



Tri-Party Agreement

0061504

MAR 17 2004

Mr. Patrick Sobotta, Director  
Environmental Restoration/  
Waste Management Program  
Nez Perce Tribe  
P.O. Box 365  
Lapwai, ID 83540

RECEIVED  
MAR 23 2004  
EDMC

Dear Mr. Sobotta:

**COMPLETION OF NEGOTIATIONS ON TANK WASTE RETRIEVAL AND  
CLOSURE, TRI-PARTY AGREEMENT MILESTONE M-45-00C**

The U.S. Department of Energy, Office of River Protection (ORP) and the Washington State Department of Ecology (Ecology), in cooperation with the U.S. Environmental Protection Agency, have completed required negotiations under Tri-Party Agreement Milestone M-45-00C, regarding Single-Shell Tank Waste Management Area waste retrieval and closure.

Negotiations began November 6, 2003, and were completed February 26, 2004. A tentative agreement has been reached and a package of changes to the Tri-Party Agreement has been developed and found mutually acceptable to the parties.

The proposed change includes establishing a process for retrieving waste from tanks and ancillary equipment in the tank farms, and identifies priorities and criteria for the order in which additional tanks may be sequenced for retrieval. A copy of the proposed change is enclosed with this letter for your review.

A public comment period on the proposed change is scheduled to begin March 31, 2004, and conclude May 14, 2004. The agencies are available for specific presentations to the Tribal Nations.

MAR 17 2004

If you have any questions, please contact Roger Stanley, Ecology, (360) 407-7108, or Delmar Noyes, ORP, (509) 376-5166.



Roy J. Schepens  
U.S. Department of Energy  
Office of River Protection



Michael Wilson  
State of Washington  
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Nick Ceto  
U.S. Environmental  
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ORP:EO

Enclosure:  
M-45 Change Package

cc w/encl:

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**Administrative Record**



Tri-Party Agreement

CONCLUSION AGREEMENT ON NEGOTIATION UNDER MILESTONE M-45  
(COMPLETE CLOSURE OF ALL SINGLE SHELL TANK FARMS)

February 26, 2004

The State of Washington Department of Ecology, the U.S. Environmental Protection Agency, and the U.S. Department of Energy (the parties) have concluded negotiations on commitments regarding Single-Shell Tank Waste Management Area (WMA) waste retrieval and closure pursuant to Agreement M-45-00C. A tentative agreement has been reached and a package of changes to the Hanford Federal Facility Agreement and Consent Order (Agreement) has been developed and found mutually acceptable to the parties. These changes are attached to this Negotiation Conclusion Agreement.

It is the parties' intent to submit the Tentative Agreement for a 45-day public comment period to run from approximately March 31, 2004 to May 14, 2004. Following the public comment period, the parties will jointly prepare responses to public comments that have been received. Final approval by the parties is subject to public comment and appropriate change request modifications, if necessary. The parties further agree that to minimize additional delay, and if the parties are not able to resolve all issues with regard to comments, any unresolved matters shall be referred back for dispute resolution under the Tri-Party Agreement, Article VIII. However, any dispute resulting from these negotiations shall be initiated at the Inter-Agency Management Team level as described in the Tri-Party Agreement.

The parties are expected to approve changes to the Agreement by June 15, 2004.

Delmar L. Noyes, Lead Negotiator  
U.S. Department of Energy  
Office of River Protection

Laura J. Cusack, Lead Negotiator  
State of Washington  
Department of Ecology

David Bartus, Lead Negotiator  
U.S. Environmental Protection Agency  
Region 10

Moses N. Jarayssi, Lead Negotiator  
CH2M Hill Hanford Group, Inc.

<b>Change Number</b> M-45-04-01	<b>Federal Facility Agreement and Consent Order  Change Control Form</b> Do not use blue ink. Type or print using black ink. <del>Do not use blue ink. Type or print using black ink.</del>	<b>Date</b> February 17, 26 2004																
<b>Originator</b> Ecology		<b>Phone</b> 736 3038																
<b>Class of Change</b> <input checked="" type="checkbox"/> I – Signatories <input type="checkbox"/> II – Executive Manager <input type="checkbox"/> III – Project Manager																		
<b>Change Title</b> Hanford Federal Facility Agreement and Consent Order (HFFACO or Agreement) modifications pursuant to milestone M-45-00C including Appendix D work schedule modifications governing single-shell tank (SST) system waste retrieval and closure, and the establishment of new Agreement Appendix I, "SST system waste retrieval and closure process".																		
<b>Description/Justification of Change</b> This Agreement modification establishes regulatory requirements under which wastes within the U. S. Department of Energy's (DOE's) Single Shell Tank (SST) Waste Management Areas (WMA) will be retrieved, and the WMA's subsequently closed pursuant to state and federal law.  The parties' " <u>Single-Shell Tank Waste Retrieval and Closure Process</u> " (See following new Agreement Appendix I) has been developed to cover all aspects of SST system waste retrieval and closure including the single shell tanks per se' and their ancillary equipment (e.g., waste transfer piping, valve pits, diversion boxes, vaults, inactive, miscellaneous underground storage tanks (IMUSTs) etc.), contaminated soils, and contaminated groundwater. The process will be implemented in retrieving wastes from components of the SST system, and eventually closing DOE's SST Waste Management Areas (WMA's) in compliance with all applicable Federal and State laws and regulations. This includes the requirements of Washington's Dangerous Waste Regulations applicable to waste retrieval and the closure of tank systems, including contaminated media (soils and groundwater).																		
<b>Impact of Change</b> Modification of Agreement requirements regarding SST system waste retrieval and closure. Modification of Agreement Appendix D work schedules. The establishment of new Agreement Appendix I, <u>SST System Waste Retrieval and Closure Process</u> .																		
<b>Affected Documents</b> The <u>Hanford Federal Facility Agreement and Consent Order</u> (Agreement) as amended, and Hanford site internal planning, management, and budget documents (e.g., River Protection Project System Plan, Baseline Control documents, and related work authorizations and directives).																		
<b>Approvals</b> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 40%; border-bottom: 1px solid black;">Ecology</td> <td style="width: 15%; border-bottom: 1px solid black;">Date</td> <td style="width: 15%; border-bottom: 1px solid black;">_____ Approved</td> <td style="width: 30%; border-bottom: 1px solid black;">_____ Disapproved</td> </tr> <tr> <td style="border-bottom: 1px solid black;">DOE-ORP</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="border-bottom: 1px solid black;">_____ Approved</td> <td style="border-bottom: 1px solid black;">_____ Disapproved</td> </tr> <tr> <td style="border-bottom: 1px solid black;">DOE-RL</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="border-bottom: 1px solid black;">_____ Approved</td> <td style="border-bottom: 1px solid black;">_____ Disapproved</td> </tr> <tr> <td style="border-bottom: 1px solid black;">EPA</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="border-bottom: 1px solid black;">_____ Approved</td> <td style="border-bottom: 1px solid black;">_____ Disapproved</td> </tr> </table>			Ecology	Date	_____ Approved	_____ Disapproved	DOE-ORP	Date	_____ Approved	_____ Disapproved	DOE-RL	Date	_____ Approved	_____ Disapproved	EPA	Date	_____ Approved	_____ Disapproved
Ecology	Date	_____ Approved	_____ Disapproved															
DOE-ORP	Date	_____ Approved	_____ Disapproved															
DOE-RL	Date	_____ Approved	_____ Disapproved															
EPA	Date	_____ Approved	_____ Disapproved															

Modifications made by this M-45-04-01 Change Request also modify Agreement Appendix D work schedules by: 1) Modifying the requirements of major milestone M-45-00 to document that the parties' new Agreement Appendix I is a requirement applicable to the execution of all M-45 milestone series work, 2) by modifying Agreement milestone M-45-00B to redefine required near term (prior to October 2006) SST system waste retrieval and interim closure work requirements, 3) by deleting previous Agreement Appendix D requirements regarding SSTs S-103, S-105, and S-106 in order to allow the parties' to focus on the retrieval of wastes and the interim closure of all WMA C SSTs, 4) by modifying Agreement milestone M-45-00C to govern waste retrieval and closure negotiations scheduled in 2005, 5) by modifying Agreement milestone M-45-00D to govern waste retrieval and closure negotiations in 2008, and 6) by establishing new Agreement milestone M-45-00E, governing waste retrieval and closure negotiations scheduled for 2013 (following completion of construction and ramp up of DOE's tank Waste Treatment Plant (WTP)).

Ecology, DOE and EPA agree that work pursuant to this M-45-04-01 Change Request will be managed via one unified schedule incorporating Agreement terms, DOE (internal agency requirements), and DOE's (approved) contractor baseline. On approval of this M-45-04-01 change, Hanford site internal planning, management (e.g., work authorizations and directives), and budget documents shall be modified accordingly.

In recognition of the preceding, the Parties' have agreed as follows:

- I. The following new Agreement Appendix I: "SINGLE-SHELL TANK (SST) SYSTEM WASTE RETRIEVAL AND CLOSURE PROCESS" is hereby established:

#### APPENDIX I

### SINGLE SHELL TANK SYSTEM WASTE RETRIEVAL AND CLOSURE PROCESS

#### 1.0 Purpose and Introduction

The purpose of this Agreement Appendix I is to:

1. Document the process DOE is required to use to close DOE's SST system (i.e., the single-shell tanks themselves; and associated ancillary equipment including waste transfer piping, valve pits, vaults, etc.; contaminated soils, and contaminated groundwater<sup>1</sup>) including the retrieval of tank wastes. The major phases of this process are: Tank waste retrieval; SST System, WMA and component closure including WMA corrective actions; and groundwater remedial actions. The process also documents the parties' recognition that SST WMA closure and other Central Plateau waste site cleanup activities via compliance with Federal and State requirements need integration<sup>2</sup> (reference Agreement Section 5.5). Specific SST WMA closure objectives and standards will be delineated in HWMA Closure Plans.
2. To establish and document the agencies' waste retrieval and closure process consistent with that defined in Washington Administrative Code (WAC) 173-303-610 and -640 for closure of all DOE's SST system (tanks, ancillary equipment, soil and groundwater).

DOE, Ecology and EPA expect that this process will standardize Agreement requirements for SST system closure and post closure. The process requires the submittal of Agreement primary documents that establish enforceable requirements and schedules in lieu of multiple Agreement milestones. This process further serves as a mechanism to identify and establish requirements to be used throughout the SST System. These requirements include:

- Creating criteria to be used to define the sequence of SSTs selected for retrieval and subsequent closure actions, and
- The process to be utilized in retrieving wastes and closing components of the SST system.

#### 2.0 SST System Waste Retrieval and Closure Process

<sup>1</sup> The DOE and the Ecology have grouped the SST System into seven WMAs: WMA A-AX; WMA B-BX-BY; WMA C; WMA S-SX; WMA T; WMA TX-TY; and WMA U.

<sup>2</sup> For the purpose of this M-45-04-01 Change Request the terms integrate and integration mean to coordinate for the purposes of efficiency and effectiveness. Such terms have no effect on respective agency authority, requirements or responsibilities.

Figure I-1 depicts the process DOE is required to follow during SST WMA waste retrieval and closure. It identifies four main areas of emphasis: Tank waste retrieval; SST System, WMA and component closure, including WMA corrective action; and groundwater remedial actions. These areas are discussed in greater detail in the following sections of this appendix. Each box within Figure I-1 identifies an action needed to achieve closure of the SST System. Actions or deliverables requiring approval by Ecology are identified. **Insert Figure I-1**

## 2.1 Tank Waste Retrieval

Waste retrieval is a major activity in the process of SST System closure. Criteria applicable to SST waste retrieval activities, as stated in milestone M-45-00, are: "...retrieval of as much waste as technically possible, with tank residues not to exceed 360 cubic feet (cu. ft.) in each of the 100 series tanks, 30 cu. ft. in each of the 200 series tanks, or the limit of waste retrieval technology capability, whichever is less." If these waste retrieval criteria are not met for a specific tank using the selected technology(s), DOE may use the procedure delineated in Agreement Appendix H to request Ecology approval of an exception to the waste retrieval criteria for that specific tank.

The parties' waste retrieval and closure process is described in the following sections:

### 2.1.1 Waste Management Area Integration Study

For each SST tank farm (or WMA), DOE shall submit a WMA Integration Study. This study shall look at the entire WMA from a system perspective and describe the inter-relationships between the various components. The study shall describe a logical sequence of events that would lead to efficient and effective waste retrieval and closure of the WMA, including field sampling and characterization activities of the ancillary equipment (piping, valve pits, vaults, Miscellaneous Underground Storage Tanks, diversion boxes, etc.). This study will be used in the development of the WMA Closure Plan. The document will propose a regulatory path for all ancillary equipment in that WMA and all the activities to achieve efficient and effective closure of that WMA, including all;

- Single Shell Tanks
- SST system ancillary equipment
- Soil remediation per WMA corrective actions and proposed plans for WMA soils.
- Groundwater remediation activities and activities necessary for integration with Central Plateau groundwater remediation.

It is anticipated that tank waste will need to be retrieved from ancillary equipment in order to meet the closure requirements of WAC 173-303-610 and -640. The criteria for these retrievals will be governed by those regulations.

The submittal of WMA Integration Studies will be scheduled through the M-45 milestone series.

### 2.1.2 Tank Retrieval Selection and Sequencing

The initial phase of SST system tank waste retrieval extends to that point in time when DST waste begins to be transferred to the Waste Treatment Plant (WTP) pursuant to Milestone M-62-09. During this phase, DST capacity will be a major factor in DOE's ability to retrieve SST tank waste. DOE will perform space acquisition and/or optimization activities as required by the Agreement's M-46 series milestones in order to maximize available DST space. In addition, DOE will perform SST tank waste retrievals to maximally utilize DST space available for retrieval. The second phase of waste retrieval begins when DST capacity is again made available (to receive more SST waste) as DST waste is transferred to WTP for treatment.

SST tank waste retrieval selection and sequencing will be performed on a bi-annual basis in accordance with the following steps:

- DOE will develop its SST Tank Retrieval Selection & Sequence document as a primary document for approval by Ecology in accordance with the milestone M-45-02 series. The pool of tanks selected by this document will be used as the starting point for selecting and scheduling the following two years' tank waste retrieval activities.

- The primary objectives and prioritization criteria for SST tank retrieval selection & sequence are to maximize the reduction of short-term and long-term risk to human health and the environment, and to optimize waste feed so as to maintain efficient WTP operations.
- Additional criteria that will be considered in tank selection and that may result in lower risk tanks being retrieved first, include:
  - Worker safety.
  - Supporting the completion of WMA closures.
  - The optimization of DST space utilization considering resource leveling and waste transfer infrastructure.
  - Waste retrieval and closure requirements for associated ancillary equipment.
- Annually, the parties will agree on which SSTs are to be retrieved during the coming year from the pool of tanks approved by Ecology through the SST Tank Retrieval Selection and Sequencing document.
- To maintain optimal operational efficiency, DOE may request approval of changes to the selection of tanks to be retrieved in a certain year. In such cases DOE will propose the new tank(s) from the pool approved by Ecology in the Tank Sequencing and Selection document.

### 2.1.3 Tank Waste Retrieval Work Plans

Tank Waste Retrieval Work Plans (TWRWP) will be submitted to Ecology as Agreement primary documents for a tank or set of tanks and their associated ancillary equipment. TWRWPs may cover tanks, tanks and associated ancillary equipment, or ancillary equipment alone (as may be required). TWRWPs will address only those actions associated with waste retrieval. Processes not covered by a TWRWP will be addressed by separate permitting actions as applicable. These Tank Waste Retrieval Work Plans, although expanded in scope by this appendix I, were formerly identified as the parties' Functions and Requirements documents in various M-45 series milestones. Work Plans will include the following information:

- Tank(s) and/or ancillary equipment condition and configuration.
- Retrieval technology or technologies and rationale for selection to meet Agreement M-45-00 criteria for tanks and regulatory requirements for ancillary equipment.
- LDMM plan, including technology description, rationale for selection, configuration, inspection and monitoring requirements, mitigation response, and anticipated performance goals
- Operational Requirements During Retrieval
- A Pre-retrieval Risk Assessment of potential residuals, consideration of past leaks, and potential leaks during retrieval, based on available data and the most sophisticated analysis available at the time. The purpose of this risk assessment is to aid operational decisions during retrieval activities. This Risk Assessment will not be used to make final retrieval or closure decisions. Minimally it will contain the following:
  - Long-term human health risks associated with potential leaks during retrieval and potential residual waste after completion of retrieval.
    - Potential impacts to groundwater, including a WMA-level risk assessment.
    - Potential impacts based on an intruder scenario.
  - Process management responses to a leak during retrieval and estimated potential leak volume.
  - The pre-retrieval risk analysis will be based on the following criteria:
    - Using the WMA fence-line for point of compliance.
    - Identify the primary indicator contaminants (accounting for at least 95% of impact to groundwater risk) and provide the incremental lifetime cancer risk (ILCR) and hazard index (HI).
    - Using ILCR and HI for the industrial and residential human scenarios as the risk metric.
    - Calculated concentration(s) of primary indicator contaminant(s) in groundwater (mg/l, and pCi/l).
- Functions and associated requirements necessary to support design of proposed waste retrieval and LDMM system(s).
- Preliminary isolation evaluation including list of ancillary equipment associated with the specific component, plans for ancillary equipment removal or waste retrieval, available characterization information for waste contained within ancillary equipment, and anticipated interrelated impacts of various retrieval actions

- Retrieval start dates for each component

Submittal of the TWRWP will be accompanied by a provisional schedule for informational purposes. The provisional schedule will include design, construction and field retrieval activities.

Any TWRWP that identifies the use of new above ground tanks, tank systems or treatment systems (not otherwise permitted), will require the following additional information;

- General Arrangement Diagrams
- System Description
- Piping and Instrumentation Drawings (P & ID) for the retrieval system
- Process flow diagrams
- Information to demonstrate compliance with WAC 173-303-640
- Describe the disposition of the system at completion of the retrieval

These new above ground tanks, tank systems or treatment systems may be operated only during the retrieval duration.

DOE will not begin retrieval activities (i.e. start of the retrieval system construction) until the TWRWP for a particular tank or component has been approved by Ecology, or a separate approval has been requested by DOE and given by Ecology. Tank waste retrieval will be completed to achieve Agreement criteria within 12 months of the start date(s) established in the TWRWP. The parties' working assumption is that upon completion of the work described in the TWRWP, DOE will have met the tank waste retrieval criteria of Milestone M-45-00 for tanks, and the regulatory requirements for ancillary equipment.

The parties recognize that DOE may be required by Ecology to perform additional retrieval activities depending on the results of the initial retrieval activities, residual waste characterization and risk assessments, or in the event of Ecology disapproval of a request for an exception under Appendix H. Ecology reserves the right to require additional retrieval activities if necessary.

#### 2.1.4 Retrieval System(s) Design & Construction

After selecting the waste retrieval technology or technologies for a tank, group of tanks, and/or ancillary equipment, DOE will complete the design and construction of the retrieval system(s) based on the functions and requirements developed in the Tank Waste Retrieval Work Plan. This retrieval system design will include at a minimum:

- Final Design Specifications
- Quality Assurance process
- Acceptance Test Plans and Operational Test Plans
- Process Control Plan

#### 2.1.5 Waste Retrieval

Field retrieval activities will be started consistent with the requirements and retrieval start dates approved in the TWRWP. DOE will implement all the requirements, processes and schedules approved in the TWRWP, including leak detection, monitoring, and mitigation activities, throughout the retrieval.

DOE will complete tank waste retrieval activities meeting Agreement criteria of M-45-00, and ancillary equipment waste retrieval activities meeting regulatory requirements, within 12 months of the retrieval start date(s) approved in the TWRWP.

#### 2.1.6 Residual Tank Waste Characterization

Before tank waste field retrieval activities are initiated, DOE will develop a tank or component specific retrieval Data Quality Objectives (DQO) document for the residual tank waste characterization in coordination with

Ecology. As part of the DQO process, DOE will also develop a Sampling and analysis Plan (SAP) for post-retrieval and closure sampling.

#### 2.1.7 Retrieval Data Report

Once DOE has completed the retrieval actions described in the TWRWP, DOE will either complete and submit to Ecology within 120 days its Retrieval Data Report, or a request for exception to retrieval criteria per Agreement Appendix H. The appendix H option is only applicable for SSTs.

At a minimum, DOE's Retrieval Data Report will include:

- Residual tank waste volume measurement, including associated calculations.
- The results of residual tank waste characterization.
- Retrieval technology performance documentation
- DOE's updated post-retrieval risk assessment
- Discussion of feasibility / viability of other available retrieval technologies, the feasibility of developing additional retrieval technologies, associated detailed cost estimates and amount of additional waste that could be removed.
- Opportunities and actions being taken to refine or develop tank waste retrieval technologies, based on lessons learned
- LDMM monitoring and performance results.
- DOE's recommendation for further action and proposed schedule(s).

Data from this report will be used by Ecology and DOE in making WMA-, tank- and component-specific closure decisions. Single or multiple tank and component actions will be included in this report as appropriate.

## 2.2 SST System Component and WMA Closure

### 2.2.1 SST System Closure Plan Development

As shown in Figure I-1, tank waste retrieval will occur prior to or in parallel with approval of modifications to the SST System Closure Plan. At the latest, DOE shall submit a certified component(s) Closure Activity Plan with its retrieval data package or its Appendix H exception request. As noted in Sections 2.3 and 2.4, RCRA corrective action authority may be used to develop proposed final actions for some SST System components with approval to occur by Ecology through incorporation of the component closure plans into the Site-Wide Permit.

The SST System Closure Plan consists of three main sections that are arranged in a hierarchy. The highest-level plan (Tier 1) documents requirements pertaining to the single-shell tank system overall and is commonly referred to as the "Framework Plan." Mid-level plans (Tier 2) document requirements pertaining to each of the seven SST WMAs and are termed WMA Closure Action Plans. The lowest level plan (Tier 3) documents requirements pertaining to the closure of individual SSTs, and to the closure of individual ancillary equipment components within a particular WMA. These plans are termed Component Closure Activity Plans.

The Hanford Site Hazardous Waste Facility Permit modification process from submittal of initial plans (Revision 0) through public review and issuance of the modification is detailed in Agreement Section 9.2.2. It is expected that review time will become shorter as more tank waste retrieval and closure actions or sets of actions are completed due to experience gained and comparability of scope. Therefore, the parties may develop alternative schedules for permit processing to that appearing at Agreement Table 9-2. Agreements on any alternative schedules will be approved by the Parties and included in the administrative record.

### 2.2.2 Ancillary Equipment Closure Actions

SST ancillary equipment will be closed in accordance with WAC 173-303-610 with associated requirements incorporated into the Site-Wide Permit through the component closure activity plans. Regulatory processes used to assess and develop necessary closure requirements for the wide range and location of ancillary equipment may differ depending upon efficiencies that may be gained through integration with other site activities. For example, large ancillary equipment such as vaults or IMUSTs are similar to SSTs and may contain a waste

inventory requiring large scale retrieval actions. Closure of these types of components is expected to be defined as part of a Tier 3 component Closure Activity Plan. Closure of selected ancillary equipment components that are smaller, have less inventory, and that are closely coupled to actual or potential soil contamination may or may not be addressed through the Corrective Action process in association with adjacent contaminated soil (Section 2.3). Further, closure of ancillary equipment that is outside of a WMA boundary may or may not be defined as part of the regional closure action for the operable unit within which it resides. For example, where a CERCLA action is occurring outside of a WMA, but within a large geographic area that also contains SST system ancillary equipment, it may be logical to clean up / close these components in coordination with the rest of the waste sites and structures in the area in accordance with the process described in Agreement Section 5.5. In all cases, SST ancillary equipment will be closed in accordance with the requirements of WAC 173-303-610 and the actions to be taken and closure decisions will be made through the component closure activity plans that are incorporated into the Site Wide Permit.

The regulatory process (RCRA permit process versus RCRA corrective action) to be used to close each ancillary equipment component will be agreed to through approval of the WMA Closure Action Plans.

### 2.3 WMA Corrective Actions

Closure decisions for SST System soils will be made through the RCRA corrective action process pursuant to Agreement milestones M-45-55 through -60 and its established process for the development of interim measures where appropriate, RFI/CMS work plans, remedial field investigations, and corrective measures studies. It is expected that the Phase I corrective action process required by the specified milestones will result in adequate characterization to make final closure decisions. Ecology reserves the right to require additional characterization either through a Phase II corrective action process or through the development of a component closure activity plan if additional characterization is required.

It is expected that in some cases, the RCRA corrective action process will be used to investigate and analyze alternatives for remediation of selected soils/ancillary equipment. The regulatory process to be used to satisfy closure requirements for each ancillary equipment component will be agreed to through approval of the WMA Closure Action Plan and incorporated into the Site Wide Permit.

### 2.4 Groundwater Remedial Actions

Ecology, as the lead agency for SST System closure, EPA, and DOE are electing to investigate and remediate groundwater as part of the remedial investigation / feasibility study process under CERCLA. The information generated through the groundwater RI/FS process will be utilized in the development of SST System Closure Plans and Performance Assessment. Integration of CERCLA authority concurrently with RCRA closure and corrective action requirements, will allow Ecology and EPA to address all regulatory and environmental obligations associated with contaminated groundwater regardless of the types of contaminants of concern being addressed.

There are four past practice operable units that are affected by DOE's SST System; 200-PO-1, 200-UP-1, 200-ZP-1 and 200-BP-5. Of these, 200-PO-1 is the only RPP. Ecology, the EPA and DOE agree that past-practice authority may provide the most efficient means for addressing mixed-waste groundwater contamination plumes originating from a combination of TSD and past-practice units. However, in order to ensure that TSD units within the operable units are brought into compliance with RCRA and State hazardous waste regulations, Ecology intends, subject to part four of the Agreement, that all response or corrective actions, excluding situations where there is an imminent threat to the public health or environment as described in Section 7.2.3, will be conducted in a manner which ensures compliance with the technical requirements of the HWMA (Chapter 70.105 RCW and its implementation regulations). In any case, the parties agree that CERCLA remedial actions will comply with ARARs. Notwithstanding this operating assumption Ecology reserves its right to require groundwater response actions consistent with its corrective action authority under the HWMA.

### 2.5 Performance Assessment

Ecology, as the lead agency for SST System closure, EPA, and DOE have elected to develop and maintain as part of the SST System Closure Plan one Performance Assessment for the purposes of evaluating whether SST system closure conditions are protective of human health and the environment for all contaminants of concern, both radiological and non radiological. This Performance Assessment will document by reference all relevant performance requirements defined by RCRA, CERCLA, HWMA, *Clean Water Act*, *Safe Drinking Water Act*, and the AEA, and there for, in so doing it is of larger

scope than a risk assessment required solely for nonradiological contaminants. This eliminates a duplicative functional requirement as well as a duplicative documentation requirement. A Performance Assessment (PA) will be developed for each WMA and will incorporate the latest information available. These PAs will be approved by Ecology and DOE pursuant to their respective authorities and will be incorporated, by reference, into the Site Wide Permit through the Closure Plans.

As individual components are retrieved or characterized, or other component closure activities are completed, the resulting component characterization information will be incorporated into the WMA PA to determine its relative risk compared to the entire WMA performance. In doing this, the parties will be able to make interim closure decisions for individual components. Initially, the WMA PA will be based on assumptions and available data describing component characterization information. As each WMA proceeds toward closure, its respective PA will be updated to address all pertinent new results and findings – and will, at a minimum, incorporate the following results as they become available: actual volumes of tank waste residuals left after retrieval, results of leak investigations, new geologic and ancillary equipment waste characterization information, and the results of new barrier and tank residual stabilization and fill performance studies and tests. Final WMA closure decisions will be made after all components are retrieved and/or characterized, and all other component closure activities have been completed and a final WMA PA is completed.

### **3.0 SST System Closure / Integration With Other Central Plateau Activities**

#### **3.1 SST System Closure Regulatory Integration Strategy**

DOE is the responsible agency for the closure of all SST WMAs through post closure, in close coordination with other closure and cleanup activities of the Central Plateau. Washington State has a state program that is authorized under RCRA and implemented through the HWMA and its associated regulations; therefore, Ecology is the lead regulatory agency responsible for the closure of the SST System. EPA is the support regulatory agency providing oversight of the State's authorized program. The 200 Areas of the Hanford Site have been placed by EPA on the NPL. The completion of remediation of the 200 Areas overall will eventually be finalized via CERCLA decisions made by the EPA, and permitting decisions made by Ecology.

The Tri-Parties acknowledge the need for SST System closure in a manner integrating RCRA TSD closure requirements (including RCRA corrective action requirements), the closure requirements of the AEA, and Central Plateau CERCLA remedial action requirements in order to achieve a cohesive and effective approach to SST system closure assuring that regulatory requirements are met. The parties' expect that this Agreement Appendix I will incorporate Agreement Section 5.5 processes to provide a mechanism for avoiding duplicative regulation between Ecology and the EPA through the lead agency concept.

For the purpose of helping to ensure work is not inconsistent with future CERCLA remedial decisions, if any, Ecology is seeking the involvement of EPA pursuant to Agreement Action Plan Section 5.6 as the non-lead agency in Ecology's review of the Performance Assessment and SST System Closure Plan. Involvement with Ecology in conducting these reviews will provide EPA and DOE with a basis to evaluate whether closure is proceeding in a manner not inconsistent with what EPA expects would be required if the work was being conducted under CERCLA remedial authority.

EPA's involvement in these reviews will not constitute a decision under CERCLA. Based on EPA's involvement supporting Ecology review of the initial WMA Performance Assessment and WMA Closure Action Plans, EPA will provide written comments to Ecology, made available to DOE, for the purpose described above, as well as to identify the need for additional work that EPA expects would be required if the work was being conducted under CERCLA remedial authority. EPA will evaluate the need to provide additional comments based on its review of proposed modifications to WMA Closure Action Plans, and issue additional comments to Ecology as necessary.

#### **3.2 Integration with Central Plateau Remedial Actions**

The Tri-Parties will strive to integrate SST System closure actions with Central Plateau remedial actions. Integration will provide for protective, cost-effective site closure. Closure of SST System components such as ancillary equipment and soil contamination outside of WMAs will require close integration with decision making at adjacent sites. A consistent groundwater monitoring, protection, and risk assessment methodology will also be realized through close integration of activities, as described in the Hanford Site Groundwater Strategy (DOE/RL-2002-59). Consistent application of the

requirements of this Appendix I will serve to aid the parties in assuring a cost-effective and consistent cleanup on the Central Plateau. Central Plateau cleanup integration will also allow efficiencies through the coordination of operational interfaces on the Hanford Site.

II. Modifications to the Agreement M-45 milestone series incorporated into the HFFACO by approval of this M-45-04-01 Change Request are shown here as either ~~added~~ additions or ~~deletions~~ deletions.

<p>M-045-00 LEAD AGENCY: ECOLOGY</p>	<p>COMPLETE CLOSURE OF ALL SINGLE SHELL TANK FARMS.</p> <p>CLOSURE WILL FOLLOW RETRIEVAL OF AS MUCH TANK WASTE AS TECHNICALLY POSSIBLE, WITH TANK WASTE RESIDUES NOT TO EXCEED 360 CUBIC FEET (CU. FT.) IN EACH OF THE 100 SERIES TANKS, 30 CU. FT. IN EACH OF THE 200 SERIES TANKS, OR THE LIMIT OF WASTE RETRIEVAL TECHNOLOGY CAPABILITY, WHICHEVER IS LESS. IF THE DOE BELIEVES THAT WASTE RETRIEVAL TO THESE LEVELS IS NOT POSSIBLE FOR A TANK, THEN DOE WILL SUBMIT A DETAILED EXPLANATION TO EPA AND ECOLOGY EXPLAINING WHY THESE LEVELS CANNOT BE ACHIEVED, AND SPECIFYING THE QUANTITIES OF WASTE THAT THE DOE PROPOSES TO LEAVE IN THE TANK. THE REQUEST WILL BE APPROVED OR DISAPPROVED BY EPA AND ECOLOGY ON A TANK-BY-TANK BASIS. PROCEDURES FOR MODIFYING THE RETRIEVAL CRITERIA LISTED ABOVE, AND FOR PROCESSING REQUESTS FOR EXCEPTIONS TO THE CRITERIA ARE OUTLINED IN APPENDIX H TO THE AGREEMENT.</p> <p><del>FOLLOWING COMPLETION OF RETRIEVAL, SIX OPERABLE UNITS (TANK FARMS), AS DESCRIBED IN APPENDIX C (200 BP 7, 200 PO 3, 200 RO 4, 200 TP 5, 200 TP 6, 200 UP 3), WILL BE REMEDIATED IN ACCORDANCE WITH THE APPROVED CLOSURE PLANS. FINAL CLOSURE OF THE OPERABLE UNITS (TANK FARMS) SHALL BE DEFINED AS REGULATORY APPROVAL OF COMPLETION OF CLOSURE ACTIONS AND COMMENCEMENT OF POST CLOSURE ACTIONS.</del></p> <p>FOR THE PURPOSES OF THIS AGREEMENT ALL UNITS LOCATED WITHIN THE BOUNDARY OF EACH TANK FARM WILL BE CLOSED IN ACCORDANCE WITH WAC 173-303-610. THIS INCLUDES CONTAMINATED SOIL AND ANCILLARY EQUIPMENT THAT WERE PREVIOUSLY DESIGNATED AS RCRA PAST PRACTICE UNITS. ADOPTING THIS APPROACH WILL ENSURE EFFICIENT USE OF FUNDING AND WILL REDUCE POTENTIAL DUPLICATION OF EFFORT VIA APPLICATION OF DIFFERENT REGULATORY REQUIREMENTS: WAC 173-303-610 FOR CLOSURE OF THE TSD UNITS AND RCRA SECTION 3004 (U) FOR REMEDIATION OF RCRA PAST PRACTICE UNITS.</p> <p>ALL PARTIES RECOGNIZE THAT THE RECLASSIFICATION OF PREVIOUSLY IDENTIFIED RCRA PAST PRACTICE UNITS TO ANCILLARY EQUIPMENT ASSOCIATED WITH THE TSD UNIT IS STRICTLY FOR APPLICATION OF A CONSISTENT CLOSURE APPROACH. UPGRADES TO PREVIOUSLY CLASSIFIED RCRA PAST PRACTICE UNITS TO ACHIEVE COMPLIANCE WITH RCRA OR DANGEROUS WASTE INTERIM STATUS TECHNICAL STANDARDS FOR TANK SYSTEMS (I.E., SECONDARY CONTAINMENT, INTEGRITY ASSESSMENTS, ETC.) WILL NOT BE MANDATED AS A RESULT OF THIS ACTION. HOWEVER, ANY EQUIPMENT MODIFIED OR</p>	<p>09/30/2024</p>
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- COMPLETION OF ONE ~~DOE~~ "LIMITS OF TECHNOLOGY" RETRIEVAL DEMONSTRATION, INITIATION OF A SECOND "LIMITS OF TECHNOLOGY" RETRIEVAL DEMONSTRATION, AND RETRIEVAL OF SUFFICIENT SST WASTE CONTAINING NO LESS THAN 800 CURIES OF CONTAMINANTS OF CONCERN AND OCCUPYING A MINIMUM OF 2<sup>1/2</sup> MILLION GALLONS OF DST SPACE (PER DOE BEST BASIS INVENTORY DATA, 8/01/2000). "LIMITS OF TECHNOLOGY" RETRIEVAL DEMONSTRATIONS WILL SEEK TO IMPROVE UPON PAST PRACTICE SLUICING (PPS) BASELINE TECHNOLOGY INCLUDING BUT NOT LIMITED TO RETRIEVAL EFFICIENCY, LEAK LOSS DURING RETRIEVAL, AND LEAK DETECTION MITIGATION AND MONITORING (LDMM).

~~RETRIEVAL DEMONSTRATIONS SHALL BE CONDUCTED FOR  
SALT CAKE DISSOLUTION AT TANKS C-106, C-107, C-108, C-109,  
SLUICING AT TANK C-106, C-107, VACUUM RETRIEVAL AT  
DOE C-200 SERIES TANKS, AND REMOTE ROBOTIC  
TECHNOLOGIES, VACUUM RETRIEVAL AT TANK C-106, C-107,  
AND C-108. THE CRITERIA FOR THESE DEMONSTRATIONS SHALL BE:~~

~~WASTE SHALL BE RETRIEVED TO THE DST SYSTEM TO THE  
LIMITS OF THE TECHNOLOGY (OR TECHNOLOGIES) WHICH ARE  
SELECTED (SLUDGE HARD-BEEL TECHNOLOGY, OR  
TECHNOLOGIES) MUST SEEK TO IMPROVE UPON THE PAST  
PRACTICE SLUICING BASELINE IN THE AREAS OF RECOVERED  
RETRIEVAL EFFICIENCY, LEAK LOSS POTENTIAL, AND  
SUSTAINABILITY FOR USE IN POTENTIAL LEAKING TANKS.~~

~~INSTALLATION AND IMPLEMENTATION OF FULL SCALE  
EXTERNAL TANK LEAK DETECTION, MONITORING, AND  
MITIGATION (LDMM) TECHNOLOGIES FOR THE FIRST THREE  
C-200 SERIES TANK RETRIEVALS FOLLOWING THE PPS  
BASELINE LDMM SYSTEM. C-106 DRYWELL LOGGING SHALL BE  
SUPPLEMENTED USING AN EXTERNAL TANK ELECTRICAL  
RESISTIVITY TERN METHOD. THE ELECTRICAL RESISTIVITY  
SYSTEM WILL BE DESIGNED FOR IMPLEMENTATION AT THE  
THREE TANKS AND FULLY DEPLOYED AT THE FIRST TANK TO  
BE RETRIEVED. CRITERIA FOR THE DEMONSTRATION AT THE  
FIRST TANK SHALL BE AGREED TO BY DOE AND ECOLOGY  
BEFORE THE TECHNOLOGY IS INSTALLED.~~

- ~~USDOE WILL SUBMIT FOR ECOLOGY APPROVAL A TEST  
PLAN INCLUDING AN INJECTION TEST, DESCRIBING  
THE CRITERIA AND METHOD TO TEST THE SYSTEM  
EFFECTS 30 DAYS AFTER THE COMPLETION OF THE  
TESTING. USDOE WILL SUBMIT AN EVALUATION REPORT  
AND ANY RECOMMENDATIONS FOR FURTHER DEVELOPMENT.~~
- ~~IF THE PARTIES AGREE ON THE METHOD TO  
SUSTAINABLE BE FULLY DEPLOYED IN THE SUBSEQUENT  
ADDRESSING RETRIEVAL CHANGE.~~
- ~~IF THE PARTIES DO NOT AGREE ON THE METHOD TO  
FOR SUBSEQUENT RETRIEVALS, OR IF THIS RESULTS IN  
INCONCLUSIVE ECOLOGY, THE PARTIES SHALL  
AND/OR DEVELOPMENT OF A PROPOSED  
TECHNOLOGY TO BE USED FOR THE DEMONSTRATION.~~



	<p>SST RETRIEVAL SEQUENCE, 5.) DESIGN, CONSTRUCTION AND OPERATION OF SST WASTE RETRIEVAL SYSTEMS, 6.) CLOSURE PLANNING AND CLOSURE PLAN DEVELOPMENT <del>7.) SCHEDULE FOR MAINTENANCE EQUIPMENT WASTE RETRIEVAL AND 8.) OTHER ACTIVITIES AS MAY BE NECESSARY TO SUPPORT CLOSURE AND 9.) DETERMINATION OF ADDITIONAL COMPLIANCE STORAGE SPACE THAT MAY BE REQUIRED.</del></p> <p>DOE, AND DOE'S CONTRACTOR(S) WILL RETRIEVE AND TRANSFER SST WASTES INTO THE DST SYSTEM AS SOON AS SPACE IS MADE AVAILABLE, ALLOWING DST SPACE FOR TREATMENT PLANT FEED STAGING AND SAFETY ISSUE RESOLUTION. TRANSFER OF SST WASTE WILL BE MADE ONCE SUFFICIENT DST SYSTEM SPACE IS AVAILABLE TO ALLOW A TRANSFER OF AN OPERATIONALLY PRACTICABLE VOLUME OF WASTE. SST WASTE WILL BE RETRIEVED ON A PRIORITY BASIS WITH THE GOALS OF REDUCING ENVIRONMENTAL RISK AND TREATMENT PROCESS OPTIMIZATION. DOE AND ECOLOGY WILL AGREE ON THE CRITERIA TO DETERMINE ENVIRONMENTAL RISK REDUCTION.</p> <p><del>THE PARTIES' NEGOTIATIONS UNDER THIS MILESTONE SHALL BE COMPLETED WITHIN 10 DAYS. IN THE EVENT THE PARTIES DO NOT REACH AGREEMENT WITHIN THIS TIMEFRAME, THE NEGOTIATIONS WILL BE RESOLVED AS A RESOLUTION OF DISPUTE VIA FINAL DETERMINATION OF THE DIRECTOR OF PROTECTIVE PURSUANT TO THE REGULATORY WASTE MANAGEMENT AGREEMENT. THE PARTIES SHALL FINALLY DETERMINE A DATE TO BE ISSUED WITHIN 150 DAYS OF INITIATION OF NEGOTIATIONS.</del></p>	
<p>M-045-00D</p>	<p>COMPLETE <del>ENVIRONMENTAL</del> RENEGOTIATION OF THE REMAINDER OF THE SST WASTE RETRIEVAL AND CLOSURE <del>AGREEMENT PROGRAM FOR THE PERIOD SEPTEMBER 2005 TO SEPTEMBER 2010.</del></p> <p>THESE NEGOTIATIONS WILL ESTABLISH REGULATORY REQUIREMENTS FOR THE REMAINDER OF THE SST WASTE RETRIEVAL AND CLOSURE PROGRAM (THROUGH COMPLETION OF CLOSURE AT ALL SINGLE SHELL TANK FARMS). NEGOTIATIONS WILL INCLUDE MODIFICATION AS MAY BE NECESSARY OF COMPLETION DATES FOR SST WASTE RETRIEVAL AND SST FARM CLOSURE BASED ON EXPERIENCE GAINED FROM SST AND DST WASTE RETRIEVAL WORK COMPLETED, CORRECTIVE ACTIONS, PHASE I TREATMENT COMPLEX OPERATIONS PHASE II TREATMENT PLANNING, KNOWN AND LIKELY VADOSE ZONE AND GROUNDWATER IMPACTS, AND OTHER AVAILABLE ENVIRONMENTAL IMPACT INFORMATION.</p> <p>DOE, AND DOE'S CONTRACTOR(S) WILL RETRIEVE AND TRANSFER SST WASTES INTO THE DST SYSTEM AS SOON AS SPACE IS MADE AVAILABLE, ALLOWING DST SPACE FOR TREATMENT PLANT FEED STAGING AND SAFETY ISSUE RESOLUTION. TRANSFER OF SST WASTE WILL BE MADE ONCE SUFFICIENT DST SYSTEM SPACE IS AVAILABLE TO ALLOW A TRANSFER OF AN OPERATIONALLY PRACTICABLE VOLUME OF WASTE. SST WASTE WILL BE RETRIEVED ON A PRIORITY BASIS WITH THE GOALS OF REDUCING ENVIRONMENTAL RISK AND TREATMENT PROCESS OPTIMIZATION. DOE AND ECOLOGY WILL AGREE ON THE CRITERIA TO DETERMINE ENVIRONMENTAL RISK REDUCTION.</p>	<p>06/30/2011</p>



	<p>STAINLESS STEEL WASTES (PURSUANT TO AGREEMENT MILESTONE M-45-021) DOES STAINLESS STEEL WASTE TREATMENT COMPLEX ACQUISITION INITIATIVE INFORMATION PERTAINING TO THE THE COMPLETION OF THE PARTIES TO THE PROCESSING FACILITY AND SUBSEQUENT TREATMENT TECHNOLOGY AND OTHER INFORMATION PURSUANT TO AGREEMENT MILESTONE M-45-021 AND ENVIRONMENTAL AND HUMAN HEALTH RISKS ASSOCIATED WITH RELEASE FROM THE SSTS.</p> <p>DOES AND DOES CONTRACTORS WILL RETRIEVE AND REPACK SST WASTES INTO THE DST SYSTEM AS SOON AS SPACE IS AVAILABLE, ALLOWING DST SPACE FOR TREATMENT, PAKING, STAGING AND SAFETY ISSUE RESOLUTION. TRANSFER OF SST WASTES WILL BE MADE ONCE SUFFICIENT DST SYSTEM SPACE IS AVAILABLE TO ALLOW TRANSFER OF AN OPERATIONAL PRACTICABLE VOLUME OF WASTE. SST WASTE WILL BE RETRIEVED ON A PRIORITY BASIS WITH THE OBJECTIVE OF REDUCING ENVIRONMENTAL RISK AND TREATMENT PROCESS OPTIMIZATION.</p> <p>THE PARTIES' NEGOTIATIONS UNDER THIS MILESTONE SHALL BE COMPLETED WITHIN 30 DAYS. IN THE EVENT THE PARTIES DO NOT REACH AGREEMENT WITHIN THE TIMEFRAME, THE NEGOTIATIONS WILL BE RESOLVED AS A RESOLUTION OF DISPUTE VIA FINAL DETERMINATION OF THE DIRECTOR OF SCOTCO PURSUANT TO THE PARTIES' WILCO TERMS, OTHER THAN AGREED BY THE PARTIES. THIS FINAL DETERMINATION WILL BE ISSUED WITHIN 150 DAYS OF COMMUNICATION OF NEGOTIATIONS.</p>	
<p>M-045-02M</p>	<p>SUBMIT ANNUAL UPDATES TO SST RETRIEVAL SEQUENCE DOCUMENT. (SEE TEXT OF M-45-02L FOR FURTHER DETAILS).</p> <p>THIS PROVIDES FOR AN ANNUAL UPDATE TO A SST RETRIEVAL SEQUENCE DOCUMENT THAT WILL DEFINE THE TANK, STORAGE, SEQUENCE, SELECTION CRITERIA AND RATIONAL REASONING RETRIEVAL METHODS FOR EACH TANK AND THE ASSOCIATED RETRIEVAL SCHEDULES. THE RETRIEVAL SEQUENCE DOCUMENT WILL DESCRIBE RETRIEVAL METHODOLOGIES TO BE USED TO REMOVE ESTIMATED WASTE VOLUMES TO BE GENERATED BY EACH TANK (TO BE TRANSFERRED TO THE DST OR OTHER AVAILABLE DST STORAGE). THE REPORT WILL ALSO DEFINE TANK SELECTION RATIO AND RATIONALE. THE PRIMARY OBJECTIVE OF MAXIMIZING RISK REDUCTION THROUGH THE RETRIEVAL OF WASTE FROM TANKS. THE REPORT WILL ALSO DEFINE POTENTIAL AIRBORNE CONTAMINANT AND PRINCIPAL HAZARDOUS WASTE CHARACTERISTICS IN A MANNER WHICH IS SENSITIVE TO WASTE TREATMENT FACILITY REQUIREMENTS AND GENERAL STRUCTURE CONSTRAINTS. THE SEQUENCING OF THE RETRIEVAL IS IN CONSIDERATION OF THE TANK DST SPACE AND DST WASTE COMPATIBILITY WITH SEQUENCING THE SST RETRIEVAL SEQUENCE IS IN CONSIDERATION OF WASTE HAZARDOUS CHARACTERISTICS AND RESOURCES OF THE TANKS. THE REPORT WILL BE SUBMITTED TO SCOTCO FOR APPROVAL. SPAREMENTS PRIMARY DOCUMENTS.</p>	<p>09/30/2004  <del>12/31/2004</del></p>
<p>M-045-02N</p>	<p>SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT. (SEE TEXT OF M-45-02L FOR FURTHER DETAILS).</p>	<p>09/30/2005  <del>12/31/2005</del></p>
<p>M-045-02C</p>	<p>SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT.</p>	<p>09/30/2006</p>

	(SEE TEXT OF M-45-02 <del>HL</del> FOR FURTHER DETAILS).	<del>██████████</del>
M-045-02P	SUBMIT ANNUAL UPDATE OF SST RETRIEVAL SEQUENCE DOCUMENT. (SEE TEXT OF M-45-02 <del>HL</del> FOR FURTHER DETAILS).	09/30/2007 <del>██████████</del> AND <del>██████████</del> ANNUALLY THEREAFTER
M-045-03C	COMPLETE FULL SCALE SALTCAKE WASTE RETRIEVAL TECHNOLOGY DEMONSTRATION AT SINGLE-SHELL TANK S-112. WASTE SHALL BE RETRIEVED TO THE DST SYSTEM TO THE LIMITS OF THE TECHNOLOGY (OR TECHNOLOGIES) SELECTED. SELECTED SALTCAKE RETRIEVAL TECHNOLOGY (OR TECHNOLOGIES) MUST SEEK TO IMPROVE UPON THE PAST-PRACTICE SLUICING BASELINE IN THE AREAS OF EXPECTED RETRIEVAL EFFICIENCY, LEAK LOSS POTENTIAL, AND SUITABILITY FOR USE IN POTENTIALLY LEAKING TANKS.  GOALS OF THIS DEMONSTRATION SHALL INCLUDE THE RETRIEVAL TO SAFE STORAGE OF APPROXIMATELY 550 CURIES OF MOBILE, LONG-LIVED RADIOISOTOPES AND 99% OF TANK CONTENTS BY VOLUME (PER DOE BEST-BASIS INVENTORY DATA, 8/01/2000).	03/31/2005
<del>M-045-03F</del>	<del>COMPLETE FULL SCALE SLUDGE/HARD HEEL, CONFINED SLUICING AND ROBOTIC TECHNOLOGIES WASTE RETRIEVAL DEMONSTRATION AT TANK C-104.  WASTE SHALL BE RETRIEVED TO THE DST SYSTEM TO THE LIMITS OF THE TECHNOLOGY (OR TECHNOLOGIES) SELECTED. SELECTED SLUDGE/HARD HEEL TECHNOLOGY (OR TECHNOLOGIES) MUST SEEK TO IMPROVE UPON THE PAST PRACTICE SLUICING BASELINE IN THE AREAS OF EXPECTED RETRIEVAL EFFICIENCY, LEAK LOSS POTENTIAL, AND SUITABILITY FOR USE IN POTENTIALLY LEAKING TANKS. CONFINED SLUICING IS DEFINED AS THE LOCALIZED ADDITION AND RETRIEVAL OF LIQUIDS AND WASTE. THIS DEMONSTRATION SHALL ALSO INCLUDE THE INSTALLATION AND IMPLEMENTATION OF FULL SCALE LEAK DETECTION, MONITORING, AND MITIGATION (LDMM) TECHNOLOGIES. THE PARTIES RECOGNIZE AND AGREE THAT THIS ACTION IS FOR DEMONSTRATION AND INITIAL WASTE RETRIEVAL PURPOSES. COMPLETION OF THIS DEMONSTRATION SHALL BE BY APPROVAL OF DOE AND ECOLOGY.  GOALS OF THIS DEMONSTRATION SHALL INCLUDE THE RETRIEVAL TO SAFE STORAGE OF APPROXIMATELY 89 KG OF PLUTONIUM WHICH REPRESENTS APPROXIMATELY 17% OF THE TOTAL PLUTONIUM INVENTORY WITHIN THE SST SYSTEM), AND 99% OF TANK CONTENTS BY VOLUME (PER DOE'S BEST BASIS INVENTORY DATA OF 8/01/2000).</del>	09/30/2007
<del>M-045-03H</del>	<del>COMPLETE C-104 SLUDGE/HARD HEEL, CONFINED SLUICING AND ROBOTIC TECHNOLOGIES, WASTE RETRIEVAL DEMONSTRATION DESIGN (TO INCLUDE ALL PHYSICAL SYSTEMS INCLUDING DESIGN AND OPERATING STRATEGIES NECESSARY FOR LEAK DETECTION MONITORING AND MITIGATION (LDMM)).  DESIGN WILL BE CONSIDERED COMPLETE WHEN 90% OF THE DESIGN HAS BEEN APPROVED FOR FABRICATION AND/OR CONSTRUCTION.</del>	09/30/2004

M-045-03I	<p><del>COMPLETE C-104 SLUDGE/HARD HEEL, CONFINED SLUICING AND ROBOTIC TECHNOLOGIES, WASTE RETRIEVAL DEMONSTRATION CONSTRUCTION (TO INCLUDE ALL PHYSICAL SYSTEMS INCLUDING THOSE NECESSARY FOR LEAK DETECTION MONITORING AND MITIGATION).</del></p> <p><del>CONSTRUCTION WILL BE CONSIDERED COMPLETE WHEN ALL PROCESS EQUIPMENT IS INSTALLED AND ACCEPTANCE TESTS ARE COMPLETED.</del></p>	09/30/2006
M-045-05	<p>RETRIEVE WASTE FROM ALL REMAINING SINGLE-SHELL TANKS. COMPLETE WASTE RETRIEVAL FROM ALL REMAINING SINGLE-SHELL TANKS. RETRIEVAL STANDARDS AND COMPLETION DEFINITIONS ARE PROVIDED UNDER THE MAJOR MILESTONE. THE SCHEDULE REFLECTS RETRIEVAL ACTIVITIES ON A FARM-BY-FARM BASIS. IT ALSO ALLOWS FLEXIBILITY TO RETRIEVE TANKS FROM VARIOUS FARMS IF DESIRED TO SUPPORT SAFETY ISSUE RESOLUTION, PRETREATMENT OR DISPOSAL FRED REQUIREMENTS, OR OTHER PRIORITIES.</p>	09/30/2018
M-045-05-T05	<p>INITIATE TANK RETRIEVAL FROM FIVE ADDITIONAL SINGLE-SHELL TANKS.</p>	09/30/2007
M-045-05-T06	<p>INITIATE TANK RETRIEVAL FROM FIVE ADDITIONAL SINGLE-SHELL TANKS.</p>	09/30/2008
M-045-05-T07	<p>INITIATE TANK RETRIEVAL FROM SEVEN ADDITIONAL SINGLE-SHELL TANKS.</p>	09/30/2009
M-045-05-T08	<p>INITIATE TANK RETRIEVAL FROM EIGHT ADDITIONAL SINGLE-SHELL TANKS.</p>	09/30/2010
M-045-05-T09	<p>INITIATE TANK RETRIEVAL FROM TEN ADDITIONAL SINGLE-SHELL TANKS.</p>	09/30/2011
M-045-05-T10	<p>INITIATE TANK RETRIEVAL FROM 12 ADDITIONAL SINGLE-SHELL TANKS.</p>	09/30/2012
M-045-05-T11	<p>INITIATE TANK RETRIEVAL FROM 14 ADDITIONAL SINGLE-SHELL TANKS.</p>	09/30/2013
M-045-05-T12	<p>INITIATE TANK RETRIEVAL FROM 17 ADDITIONAL SINGLE-SHELL TANKS.</p>	09/30/2014
M-045-05-T13	<p>INITIATE TANK RETRIEVAL FROM 20 ADDITIONAL SINGLE-SHELL TANKS.</p>	09/30/2015
M-045-05-T14	<p>INITIATE TANK RETRIEVAL FROM 20 ADDITIONAL SINGLE-SHELL TANKS.</p>	09/30/2016
M-045-05-T15	<p>INITIATE TANK RETRIEVAL FROM 20 ADDITIONAL SINGLE-SHELL TANKS.</p>	09/30/2017
M-045-05-T17	<p><del>SUBMIT S-105, S-106, AND S-103 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION FUNCTIONS AND REQUIREMENTS DOCUMENT.</del></p> <p><del>THIS DOCUMENT WILL ESTABLISH DEMONSTRATION SYSTEM</del></p>	04/30/2005

	<p><del>SPECIFICATIONS (INCLUDING LDMM SYSTEM SPECIFICATIONS) AND WILL ALSO INCLUDE A SCOPING LEVEL RETRIEVAL PERFORMANCE EVALUATION (RPE) FOR EACH TANK. THE FUNCTIONS AND REQUIREMENTS DOCUMENT AND ITS ASSOCIATED RPE SHALL ALSO PROVIDE, AS A SEPARATE EVALUATION FOR EACH OF THE THREE TANKS, ENVIRONMENTAL AND HUMAN HEALTH RISK EVALUATION DATA/INFORMATION ASSOCIATED WITH ESTIMATED WASTE VOLUMES TO BE RETRIEVED, THE MAXIMUM VOLUME WHICH COULD LEAK DURING RETRIEVAL, AND RISK FROM RESIDUAL WASTE. THIS DOCUMENT WILL DETAIL KNOWN AND ESTIMATED RADIONUCLIDE CONTAMINATION AND CONTAMINANT MIGRATION WITHIN THE VADOSE ZONE AS BASES OF CALCULATION. LDMM AND RPE DOCUMENTATION PROVIDED WILL BE ADEQUATE TO ALLOW ECOLOGY TO ASSESS THE ADEQUACY OF THE DEMONSTRATION SYSTEMS. THIS DOCUMENT WILL INCORPORATE LESSONS LEARNED, INCLUDING LDMM, RETRIEVAL, INSTRUMENTATION, AND OPERATIONAL EXPERIENCE FROM PREVIOUS DOE AND INDUSTRY RELATED RETRIEVAL PROJECTS. THE RETRIEVAL FUNCTIONS AND REQUIREMENTS DOCUMENT WILL DOCUMENT ALL PERTINENT RETRIEVAL AND CLOSURE REQUIREMENTS, E.G. THOSE SPECIFIC TO THE EXTENT OF RETRIEVAL NECESSARY TO ALLOW CLOSURE. DOE WILL SUBMIT ITS LDMM STRATEGY AS PART OF THE FUNCTIONS AND REQUIREMENTS DOCUMENT, PRIOR TO INITIATION OF DESIGN. THIS DOCUMENT WILL BE SUBMITTED FOR ECOLOGY APPROVAL AS AN AGREEMENT PRIMARY DOCUMENT.</del></p> <p><del>THIS FUNCTIONS AND REQUIREMENTS DOCUMENT WILL BE SUBMITTED IN A TIMELY FASHION SO THAT PROJECT CRITICAL PATH IS NOT AFFECTED, AND SO AS TO ALLOW ADEQUATE TIME FOR DOE AND ECOLOGY REVIEW, REVISION AND APPROVAL.</del></p>	
<p>M-045-05A</p>	<p>COMPLETE INITIAL WASTE RETRIEVAL FROM TANK S-102.</p> <p>THE S-102 INITIAL WASTE RETRIEVAL TECHNOLOGY (OR TECHNOLOGIES) WILL BE SELECTED BASED ON THE PRINCIPLE CRITERIA OF MAXIMIZING THE RETRIEVAL OF MOBILE, LONG-LIVED RADIOISOTOPES AND NON-RADIOLOGICAL HAZARDOUS CONSTITUENTS. THE PARTIES RECOGNIZE AND AGREE THAT THIS ACTION IS FOR INITIAL WASTE RETRIEVAL PURPOSES. COMPLETION OF THIS INITIAL RETRIEVAL SHALL BE BY APPROVAL OF DOE AND ECOLOGY.</p> <p>GOALS OF THIS INITIAL WASTE RETRIEVAL PROJECT SHALL INCLUDE THE RETRIEVAL TO SAFE STORAGE OF APPROXIMATELY 490 CURIES OF MOBILE, LONG-LIVED RADIOISOTOPES AND 99% OF TANK CONTENTS BY VOLUME <del>AND 99% OF TANK CONTENTS BY VOLUME</del> (PER DOE BEST-BASIS INVENTORY DATA, 8/01/2000).</p> <p>COMPLETION OF S-102 INITIAL WASTE RETRIEVAL IS SUBJECT TO SAFE STORAGE SPACE AVAILABILITY CONSISTENT WITH M-45-00B.</p>	<p>03/31/2005</p>
<p>M-045-05C</p>	<p>COMPLETE S-102 INITIAL WASTE RETRIEVAL PROJECT CONSTRUCTION (TO INCLUDE ALL PHYSICAL SYSTEMS INCLUDING THOSE NECESSARY FOR LEAK DETECTION MONITORING AND MITIGATION).</p>	<p>03/31/2004</p>

	<p>CONSTRUCTION WILL BE CONSIDERED COMPLETE WHEN ALL PROCESS EQUIPMENT IS INSTALLED AND ACCEPTANCE TESTS ARE COMPLETED.</p>	
<del>M-045-05E</del>	<p><del>COMPLETE S-105, S-106, AND S-103 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT DESIGN (TO INCLUDE ALL PHYSICAL SYSTEMS INCLUDING DESIGN AND OPERATING STRATEGIES NECESSARY FOR LEAK DETECTION MONITORING AND MITIGATION (LDMM) FOR EACH TANK).</del></p> <p><del>THE DESIGN WILL BE CONSIDERED COMPLETE WHEN 90% OF THE DESIGN HAS BEEN APPROVED FOR FABRICATION AND/OR CONSTRUCTION.</del></p>	06/30/2007
M-045-05F	<p>COMPLETE S-105, S-106, AND S-103 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT CONSTRUCTION (TO INCLUDE ALL PHYSICAL SYSTEMS INCLUDING THOSE NECESSARY FOR LEAK DETECTION MONITORING AND MITIGATION).</p> <p>CONSTRUCTION WILL BE CONSIDERED COMPLETE WHEN ALL PROCESS EQUIPMENT IS INSTALLED AND ACCEPTANCE TESTS ARE COMPLETED.</p>	02/30/2008
<del>M-45-05G-T01</del>	<p><del>COMPLETE S-105, S-106, AND S-103 WASTE RETRIEVAL.</del></p> <p><del>WASTE SHALL BE RETRIEVED TO THE DST SYSTEM TO THE LIMITS OF THE TECHNOLOGY (OR TECHNOLOGIES) SELECTED. RETRIEVAL SHALL RETRIEVE AS MUCH WASTE AS TECHNICALLY POSSIBLE, WITH A REMAINING RESIDUAL OF NO MORE THAN 360 CUBIC FEET (CU. FT.).</del></p>	10/31/2009
M-45-05H	<p>INTERIM COMPLETION OF TANK C-106 SST WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT.</p> <p>THE C-106 SST WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT WILL BE CONSIDERED INTERIM COMPLETE WHEN THE FOLLOWING CRITERIA HAVE BEEN MET:</p> <ol style="list-style-type: none"> <li>1. FULL SCALE WASTE RETRIEVAL HAS BEEN COMPLETED IN ACCORDANCE WITH APPLICABLE REGULATORY REQUIREMENTS INCLUDING WASHINGTON'S HAZARDOUS WASTE MANAGEMENT ACT AND REQUIREMENTS SET BY THIS AGREEMENT (DOE WILL DOCUMENT PROJECT DATA AND RESULTS IN A WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT REPORT).</li> <li>2. REMAINING WASTES HAVE BEEN ADEQUATELY CHARACTERIZED, AND A RISK ASSESSMENT, APPROVED BY ECOLOGY, HAS BEEN COMPLETED FOR RESIDUALS THAT REMAIN IN THE TANK.</li> <li>3. THE C-106 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PLAN HAS BEEN SUBMITTED BY DOE AND APPROVED BY ECOLOGY, I.E. INCORPORATED INTO THE SITE-WIDE PERMIT.</li> <li>4. IF APPROPRIATE, DOE HAS REQUESTED, AND ECOLOGY HAS APPROVED, AN EXCEPTION TO WASTE RETRIEVAL CRITERIA PURSUANT TO AGREEMENT APPENDIX H.</li> </ol>	04/30/2004

M-45-05L-T01	<p>COMPLETE FULL SCALE C-106 WASTE RETRIEVAL.</p> <p>WASTE SHALL BE RETRIEVED TO THE DST SYSTEM TO THE LIMITS OF THE TECHNOLOGY (OR TECHNOLOGIES) SELECTED. RETRIEVAL SHALL RETRIEVE AS MUCH WASTE AS TECHNICALLY POSSIBLE, WITH A REMAINING RESIDUAL OF NO MORE THAN 360 CUBIC FEET (CU. FT.).</p>	11/01/2003
M-45-05M-T01	<p>SUBMIT C-106 WASTE RETRIEVAL RESULTS; ANALYSIS OF RESIDUAL WASTE(S), AND (IF APPROPRIATE) REQUEST FOR EXCEPTION TO THE CRITERIA PURSUANT TO AGREEMENT APPENDIX H.</p>	02/27/2004
M-45-05N-T01	<p>FINAL COMPLETION OF TANK C-106 SST RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT.</p> <p>COMPLETION OF THE TANK C-106 RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT IS DEFINED AS THE COMPLETION OF NECESSARY FIELD PROJECT ACTIONS REQUIRED BY THE APPROVED C-106 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PLAN.</p>	12/31/2004
M-045-06	<p>COMPLETE CLOSURE OF ALL SINGLE-SHELL TANK FARMS IN ACCORDANCE WITH APPROVED CLOSURE/POST CLOSURE PLAN(S).</p>	09/30/2024
M-045-06-T03	<p>INITIATE CLOSURE ACTIONS ON AN OPERABLE UNIT OR TANK FARM <del>ON A</del> BASIS. CLOSURE SHALL FOLLOW COMPLETION OF THE RETRIEVAL ACTIONS UNDER PROPOSED MILESTONE M-45-05. CLOSURE WILL BE DEFINED IN AN APPROVED CLOSURE PLAN FOR THE DEMONSTRATION FARM. FINAL CLOSURE IS DEFINED AS <del>DOE'S ACCEPTANCE OF THE</del> REGULATORY APPROVAL OF COMPLETION OF CLOSURE ACTIONS.</p>	03/31/2012
M-045-06-T04	<p>COMPLETE CLOSURE ACTIONS ON ONE OPERABLE UNIT OR <del>WASTE</del> TANK FARM.</p>	03/31/2014
M-45-06-T20A	<p><del>SUBMIT SST SYSTEM IMPLEMENTATION PLAN IN SUPPORT OF RETRIEVAL AND CLOSURE ACTIVITIES.</del></p> <p><del>MAJOR WORK AREAS COVERED IN THE IMPLEMENTATION PLAN WILL INCLUDE WASTE RETRIEVAL OPERABLE UNITS CHARACTERIZATION, TECHNOLOGIES DEVELOPMENT TO SUPPORT CLOSURE, RISK ASSESSMENTS, AND GROUNDWATER MONITORING STRATEGIES. (REFINEMENT OF THE MAJOR WORK AREAS WILL BE DEVELOPED IN A JOINT ECOLOGY/DOE WORKSHOP.)</del></p> <p><del>DOE'S SST SYSTEM IMPLEMENTATION PLAN UPDATE WILL BE SUBMITTED TO ECOLOGY AS A PRIMARY DOCUMENT.</del></p>	06/30/2004
M-45-06-T20B	<p><del>SUBMIT SST SYSTEM IMPLEMENTATION PLAN IN SUPPORT OF RETRIEVAL AND CLOSURE ACTIVITIES.</del></p> <p><del>MAJOR WORK AREAS COVERED IN THE IMPLEMENTATION PLAN WILL INCLUDE WASTE RETRIEVAL OPERABLE UNITS CHARACTERIZATION, TECHNOLOGIES DEVELOPMENT TO SUPPORT CLOSURE, RISK ASSESSMENTS, AND GROUNDWATER MONITORING STRATEGIES. (REFINEMENT OF THE MAJOR WORK AREAS WILL BE DEVELOPED IN A JOINT ECOLOGY/DOE WORKSHOP.)</del></p>	05/30/2006

	<p><del>DOE'S SST SYSTEM IMPLEMENTATION PLAN UPDATE WILL BE SUBMITTED TO ECOLOGY AS A PRIMARY DOCUMENT.</del></p>	
M-45-06-T20C	<p><del>SUBMIT SST SYSTEM IMPLEMENTATION PLAN IN SUPPORT OF RETRIEVAL AND CLOSURE ACTIVITIES.</del></p> <p><del>MAJOR WORK AREAS COVERED IN THE IMPLEMENTATION PLAN WILL INCLUDE WASTE RETRIEVAL OPERABLE UNITS CHARACTERIZATION, TECHNOLOGIES DEVELOPMENT TO SUPPORT CLOSURE, RISK ASSESSMENTS, AND GROUNDWATER MONITORING STRATEGIES. (REFINEMENT OF THE MAJOR WORK AREAS WILL BE DEVELOPED IN A JOINT ECOLOGY/DOE WORKSHOP.)</del></p> <p><del>DOE'S SST SYSTEM IMPLEMENTATION PLAN UPDATE WILL BE SUBMITTED TO ECOLOGY AS A PRIMARY DOCUMENT.</del></p>	<p><del>06/30/2008 (AND EVERY 2 YEARS THEREAFTER)</del></p>
M-45-06B	<p>SUBMIT A CERTIFIED (FRAMEWORK) <del>DOE</del> SST SYSTEM CLOSURE PLAN MODIFICATION AND S-112 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PLAN <del>CONDUCTED BY THE HANFORD SITE</del>, AS AN APPLICATION FOR A MODIFICATION TO THE HANFORD SITE-WIDE HAZARDOUS WASTE FACILITY PERMIT TO ECOLOGY. THIS SUBMITTAL WILL INCLUDE ALL REQUIRED CLOSURE PLAN ELEMENTS. ADDITIONALLY, THIS SUBMITTAL WILL INCLUDE THE FOLLOWING:</p> <ol style="list-style-type: none"> <li>1. CHARACTERIZATION APPROACH FOR RESIDUAL WASTES. THIS APPROACH WILL SUPPORT DECISIONS REGARDING THE COMPLIANCE OF THE RESIDUAL WASTE WITH APPLICABLE REGULATORY REQUIREMENTS (INCLUDING BUT NOT LIMITED TO: CHARACTERIZATION NEEDS, WORK REQUIREMENTS, WORK SCHEDULES, AND CONTAMINANTS OF CONCERN FOR; RISK ASSESSMENT, LAND DISPOSAL RESTRICTION (LDR), AND THE WASHINGTON STATE HAZARDOUS WASTE MANAGEMENT ACT).</li> <li>2. A RISK ASSESSMENT METHODOLOGY INCLUSIVE OF THE ASSUMPTIONS, APPROACH, CONCEPTUAL MODEL, AND METRICS (E.G., POINT OF COMPLIANCE, RECEPTOR SCENARIOS).</li> </ol> <p>THE CHARACTERIZATION REQUIREMENTS AND RISK ASSESSMENT METHODOLOGY WILL BE JOINTLY DEVELOPED BY DOE AND ECOLOGY PRIOR TO THE SUBMITTAL.</p>	<p>09/30/2004</p>
M-45-06C	<p>SUBMIT A CERTIFIED (FRAMEWORK) <del>DOE</del> SST SYSTEM CLOSURE PLAN MODIFICATION AND S-102 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PLAN <del>CONDUCTED BY THE HANFORD SITE</del>, AS AN APPLICATION FOR A MODIFICATION TO THE HANFORD SITE-WIDE HAZARDOUS WASTE FACILITY PERMIT TO ECOLOGY. THIS SUBMITTAL WILL INCLUDE ALL REQUIRED CLOSURE PLAN ELEMENTS. ADDITIONALLY, THIS SUBMITTAL WILL INCLUDE THE FOLLOWING:</p> <ol style="list-style-type: none"> <li>1. CHARACTERIZATION APPROACH FOR RESIDUAL WASTES. THIS APPROACH WILL SUPPORT DECISIONS REGARDING THE COMPLIANCE OF THE RESIDUAL WASTE WITH APPLICABLE REGULATORY REQUIREMENTS (INCLUDING BUT NOT LIMITED TO: CHARACTERIZATION NEEDS, WORK REQUIREMENTS,</li> </ol>	<p>09/30/2004</p>

	<p>WORK SCHEDULES, AND CONTAMINANTS OF CONCERN FOR; RISK ASSESSMENT, LAND DISPOSAL RESTRICTION (LDR), AND THE WASHINGTON STATE HAZARDOUS WASTE MANAGEMENT ACT).</p> <p>2. A RISK ASSESSMENT METHODOLOGY INCLUSIVE OF THE ASSUMPTIONS, APPROACH, CONCEPTUAL MODEL, AND METRICS (E.G., POINT OF COMPLIANCE, RECEPTOR SCENERIOS).</p> <p>THE CHARACTERIZATION REQUIREMENTS AND RISK ASSESSMENT METHODOLOGY WILL BE JOINTLY DEVELOPED BY DOE AND ECOLOGY PRIOR TO THE SUBMITTAL.</p>	
<p>M-45-06D</p>	<p><del>SUBMIT A CERTIFIED (FRAMEWORK) SST SYSTEM CLOSURE PLAN MODIFICATION AND C-104 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PLAN, AS AN APPLICATION FOR A MODIFICATION TO THE HANFORD SITE WIDE HAZARDOUS WASTE FACILITY PERMIT TO ECOLOGY. THIS SUBMITTAL WILL INCLUDE ALL REQUIRED CLOSURE PLAN ELEMENTS. ADDITIONALLY, THIS SUBMITTAL WILL INCLUDE THE FOLLOWING:</del></p> <p><del>1. CHARACTERIZATION APPROACH FOR RESIDUAL WASTES. THIS APPROACH WILL SUPPORT DECISIONS REGARDING THE COMPLIANCE OF THE RESIDUAL WASTE WITH APPLICABLE REGULATORY REQUIREMENTS (INCLUDING BUT NOT LIMITED TO: CHARACTERIZATION NEEDS, WORK REQUIREMENTS, WORK SCHEDULES, AND CONTAMINANTS OF CONCERN FOR, RISK ASSESSMENT, LAND DISPOSAL RESTRICTION (LDR), AND THE WASHINGTON STATE HAZARDOUS WASTE MANAGEMENT ACT).</del></p> <p><del>2. A RISK ASSESSMENT METHODOLOGY INCLUSIVE OF THE ASSUMPTIONS, APPROACH, CONCEPTUAL MODEL, AND METRICS (E.G., POINT OF COMPLIANCE, RECEPTOR SCENERIOS).</del></p> <p><del>THE CHARACTERIZATION REQUIREMENTS AND RISK ASSESSMENT METHODOLOGY WILL BE JOINTLY DEVELOPED BY DOE AND ECOLOGY PRIOR TO THE SUBMITTAL.</del></p>	<p>06/30/2007</p>
<p>M-45-06E</p>	<p><del>SUBMIT A CERTIFIED (FRAMEWORK) SST SYSTEM CLOSURE PLAN MODIFICATION FOR TANKS S-105, S-106, AND S-103 CLOSURE DEMONSTRATION PLAN, AS AN APPLICATION FOR A MODIFICATION TO THE HANFORD SITE WIDE HAZARDOUS WASTE FACILITY PERMIT TO ECOLOGY. THIS SUBMITTAL WILL INCLUDE ALL REQUIRED CLOSURE PLAN ELEMENTS, AND PROVIDE A SEPARATE STAND ALONE EVALUATION FOR EACH TANK. ADDITIONALLY, THIS SUBMITTAL WILL INCLUDE THE FOLLOWING:</del></p> <p><del>1. CHARACTERIZATION APPROACH FOR RESIDUAL WASTES IN S-105, S-106, AND S-103. THIS APPROACH WILL SUPPORT DECISIONS REGARDING THE COMPLIANCE OF THE RESIDUAL WASTE WITH APPLICABLE REGULATORY REQUIREMENTS (INCLUDING BUT NOT LIMITED TO: CHARACTERIZATION NEEDS, WORK REQUIREMENTS, WORK SCHEDULES, AND CONTAMINANTS OF CONCERN FOR, RISK ASSESSMENT, LAND DISPOSAL RESTRICTION (LDR), AND THE WASHINGTON STATE HAZARDOUS WASTE MANAGEMENT ACT).</del></p>	<p>12/31/2008</p>

	<p><del>2. A RISK ASSESSMENT METHODOLOGY FOR TANKS S-105, S-106, AND S-103; INCLUSIVE OF THE ASSUMPTIONS, APPROACH, CONCEPTUAL MODEL, AND METRICS (E.G., POINT OF COMPLIANCE, RECEPTOR SCENARIOS).</del></p> <p><del>THE CHARACTERIZATION REQUIREMENTS AND RISK ASSESSMENT METHODOLOGY WILL BE JOINTLY DEVELOPED BY DOE AND ECOLOGY PRIOR TO THE SUBMITTAL.</del></p>	
<p>M-045-13</p>	<p>INTERIM COMPLETION OF TANK S-112 SST WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT.</p> <p>THE S-112 SST WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT WILL BE CONSIDERED INTERIM COMPLETE WHEN THE FOLLOWING CRITERIA HAVE BEEN MET:</p> <ol style="list-style-type: none"> <li>1. FULL SCALE WASTE RETRIEVAL HAS BEEN COMPLETED IN ACCORDANCE WITH APPLICABLE REGULATORY REQUIREMENTS INCLUDING WASHINGTON'S HAZARDOUS WASTE MANAGEMENT ACT, REQUIREMENTS SET BY THIS AGREEMENT, AND THE APPROVED S-112 SALTCAKE WASTE RETRIEVAL TECHNOLOGY FUNCTIONS AND REQUIREMENTS DOCUMENT (DOE WILL DOCUMENT PROJECT DATA AND RESULTS IN A WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT REPORT).</li> <li>2. REMAINING WASTES HAVE BEEN ADEQUATELY CHARACTERIZED, AND A RISK ASSESSMENT, APPROVED BY ECOLOGY, HAS BEEN COMPLETED FOR RESIDUALS THAT REMAIN IN THE TANK.</li> <li>3. THE S-112 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PLAN HAS BEEN SUBMITTED BY DOE AND APPROVED BY ECOLOGY, I.E. INCORPORATED INTO THE SITE-WIDE PERMIT.</li> <li>4. IF APPROPRIATE, DOE HAS REQUESTED, AND ECOLOGY HAS APPROVED AN EXCEPTION TO WASTE RETRIEVAL CRITERIA PURSUANT TO AGREEMENT APPENDIX H.</li> </ol>	<p>12/31/2005</p>
<p>M-45-13-T01</p>	<p>FINAL COMPLETION OF TANK S-112 SST RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT.</p> <p>COMPLETION OF THE TANK S-112 RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT IS DEFINED AS THE COMPLETION OF NECESSARY FIELD PROJECT ACTIONS REQUIRED BY THE APPROVED S-112 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PLAN.</p>	<p>12/30/2006</p>
<p>M-45-14</p>	<p><del>INTERIM COMPLETION OF TANK C-104 SST WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT.</del></p> <p><del>THE C-104 SST WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT WILL BE CONSIDERED INTERIM COMPLETE WHEN THE FOLLOWING CRITERIA HAVE BEEN MET:</del></p> <ol style="list-style-type: none"> <li><del>1. FULL SCALE WASTE RETRIEVAL HAS BEEN COMPLETED IN ACCORDANCE WITH APPLICABLE REGULATORY REQUIREMENTS INCLUDING WASHINGTON'S HAZARDOUS WASTE MANAGEMENT ACT, REQUIREMENTS SET BY THIS AGREEMENT, AND THE APPROVED C-104 SLUDGE/HARD HEEL, CONTAINED SLUICING AND ROBOTIC TECHNOLOGIES WASTE RETRIEVAL</del></li> </ol>	<p><del>06/30/2008</del></p>

	<p><del>FUNCTIONS AND REQUIREMENTS DOCUMENT (DOE WILL DOCUMENT PROJECT DATA AND RESULTS IN A WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT REPORT).</del></p> <p><del>2. REMAINING WASTES HAVE BEEN ADEQUATELY CHARACTERIZED, AND A RISK ASSESSMENT, APPROVED BY ECOLOGY, HAS BEEN COMPLETED FOR RESIDUALS THAT REMAIN IN THE TANK.</del></p> <p><del>3. THE C-104 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PLAN HAS BEEN SUBMITTED BY DOE AND APPROVED BY ECOLOGY, I.E. INCORPORATED INTO THE SITE-WIDE PERMIT.</del></p> <p><del>4. IF APPROPRIATE, DOE HAS REQUESTED, AND ECOLOGY HAS APPROVED AN EXCEPTION TO WASTE RETRIEVAL CRITERIA PURSUANT TO AGREEMENT APPENDIX H.</del></p>	
M-45-14-T01	<p><del>FINAL COMPLETION OF TANK C-104 SST RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT.</del></p> <p><del>COMPLETION OF THE TANK C-104 RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT IS DEFINED AS THE COMPLETION OF NECESSARY FIELD PROJECT ACTIONS REQUIRED BY THE APPROVED C-104 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PLAN.</del></p>	06/03/2009
M-45-15	<p>INTERIM COMPLETION OF TANK S-102 SST WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT.</p> <p>THE S-102 SST WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT WILL BE CONSIDERED INTERIM COMPLETE WHEN THE FOLLOWING CRITERIA HAVE BEEN MET:</p> <ol style="list-style-type: none"> <li>1. FULL SCALE WASTE RETRIEVAL HAS BEEN COMPLETED IN ACCORDANCE WITH APPLICABLE REGULATORY REQUIREMENTS INCLUDING WASHINGTON'S HAZARDOUS WASTE MANAGEMENT ACT, REQUIREMENTS SET BY THIS AGREEMENT, AND THE APPROVED S-102 INITIAL WASTE RETRIEVAL FUNCTIONS AND REQUIREMENTS DOCUMENT (DOE WILL DOCUMENT PROJECT DATA AND RESULTS IN A WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT REPORT).</li> <li>2. REMAINING WASTES HAVE BEEN ADEQUATELY CHARACTERIZED, AND A RISK ASSESSMENT, APPROVED BY ECOLOGY, HAS BEEN COMPLETED FOR RESIDUALS THAT REMAIN IN THE TANK.</li> <li>3. THE S-102 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PLAN HAS BEEN SUBMITTED BY DOE AND APPROVED BY ECOLOGY, I.E. INCORPORATED INTO THE SITE-WIDE PERMIT.</li> <li>4. IF APPROPRIATE, DOE HAS REQUESTED, AND ECOLOGY HAS APPROVED AN EXCEPTION TO WASTE RETRIEVAL CRITERIA PURSUANT TO AGREEMENT APPENDIX H.</li> </ol>	12/31/2005
M-45-15-T01	<p>FINAL COMPLETION OF TANK S-102 SST RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT.</p> <p>COMPLETION OF THE TANK S-102 RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT IS DEFINED AS THE COMPLETION OF NECESSARY FIELD PROJECT ACTIONS REQUIRED BY THE APPROVED S-102 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PLAN.</p>	12/31/2006

<p>M-45-16</p>	<p><del>INTERIM COMPLETION OF TANK S 105, S 106, AND S 103 SST WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT.</del></p> <p><del>THE S 105, S 106, AND S 103 SST WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT WILL BE CONSIDERED INTERIM COMPLETE WHEN THE FOLLOWING CRITERIA HAVE BEEN MET AND DOCUMENTED FOR EACH OF THE TANKS.</del></p> <ol style="list-style-type: none"> <li><del>1. FULL SCALE WASTE RETRIEVAL HAS BEEN COMPLETED IN ACCORDANCE WITH APPLICABLE REGULATORY REQUIREMENTS INCLUDING WASHINGTON'S HAZARDOUS WASTE MANAGEMENT ACT, REQUIREMENTS SET BY THIS AGREEMENT, AND THE APPROVED S 105, S 106, AND S 103 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION FUNCTIONS AND REQUIREMENTS DOCUMENT (DOE WILL DOCUMENT PROJECT DATA AND RESULTS IN A WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT REPORT).</del></li> <li><del>2. REMAINING WASTES HAVE BEEN ADEQUATELY CHARACTERIZED, AND A RISK ASSESSMENT, APPROVED BY ECOLOGY, HAS BEEN COMPLETED FOR RESIDUALS THAT REMAIN IN THE TANK.</del></li> <li><del>3. THE S 105, S 106, AND S 103 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PLAN HAS BEEN SUBMITTED BY DOE AND APPROVED BY ECOLOGY, I.E. INCORPORATED INTO THE SITE WIDE PERMIT.</del></li> <li><del>4. IF APPROPRIATE, DOE HAS REQUESTED, AND ECOLOGY HAS APPROVED, AN EXCEPTION TO WASTE RETRIEVAL CRITERIA PURSUANT TO AGREEMENT APPENDIX H. A REQUEST MAY BE MADE FOR EACH AND/OR ALL TANKS.</del></li> <li><del>5. THIS DEMONSTRATION SHALL ALSO INCLUDE THE INSTALLATION AND IMPLEMENTATION OF FULL SCALE EXTERNAL TANK LEAK DETECTION, MONITORING, AND MITIGATION (LDMM) TECHNOLOGIES FOR THESE THREE TANKS. THE BASELINE LDMM SYSTEM (I.E. DRYWELL LOGGING) IS TO BE SUPPLEMENTED, USING AN EXTERNAL-TANK ELECTRICAL RESISTIVITY (ER) METHOD. THE ELECTRICAL RESISTIVITY SYSTEM WILL BE DESIGNED FOR IMPLEMENTATION AT THE THREE TANKS AND FULLY DEPLOYED AT THE FIRST TANK TO BE RETRIEVED. CRITERIA FOR THE DEMONSTRATION AT THE FIRST TANK SHALL BE AGREED TO BY DOE AND ECOLOGY BEFORE THE TECHNOLOGY IS INSTALLED, BASED ON THE PERFORMANCE OF THE FIRST DEMONSTRATION.</del></li> </ol> <p><del>IF THE PARTIES AGREE THAT THE METHOD IS SUITABLE, ER WILL BE DEPLOYED IN THE SUBSEQUENT SALTCAKE RETRIEVAL TANKS.</del></p> <p><del>IF THE PARTIES DO NOT AGREE THAT ER IS SUITABLE FOR SUBSEQUENT SALTCAKE RETRIEVALS, OR IF THE DATA IS INCONCLUSIVE, ECOLOGY WILL REQUIRE APPROPRIATE LDMM TECHNOLOGY IN LIEU OF OR IN ADDITION TO ER.</del></p>	<p>07/31/2010</p>
<p>M-45-16-T01</p>	<p><del>FINAL COMPLETION OF TANK S 105, S 106, AND S 103 SST RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT.</del></p> <p><del>COMPLETION OF THE TANK S 105, S 106, AND S 103 RETRIEVAL</del></p>	<p>07/31/2011</p>

	<del>AND CLOSURE DEMONSTRATION PROJECT IS DEFINED AS THE COMPLETION OF NECESSARY FIELD PROJECT ACTIONS REQUIRED BY THE APPROVED S-105, S-106, AND S-103 WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PLAN.</del>	
M-045-55	SUBMIT TO ECOLOGY FOR REVIEW AND APPROVAL AS AN AGREEMENT PRIMARY DOCUMENT A PHASE 1 RFI REPORT INTEGRATING RESULTS OF DATA GATHERING ACTIVITIES AND EVALUATIONS FOR ALL SST WMAS, INCLUDING GROUNDWATER MONITORING AND IMPACTS ASSESSMENT USING HANFORD SITE GROUNDWATER MODELS, WITH CONCLUSIONS AND RECOMMENDATIONS. RESULTS FROM WMAS A-AX AND C WILL BE INCLUDED AS APPENDICES TO THE RFI ROLLUP REPORT ADDRESSING THE SST WMAS UNDER RCRA CORRECTIVE ACTION, SO THAT A SINGLE DOCUMENT CONTAINS ALL AVAILABLE INFORMATION FOR THE 200 AREA SST WMAS AND WILL SUPPORT SST RETRIEVAL AND CLOSURE.	01/31/2007
M-045-55-T03	SUBMIT TO ECOLOGY FOR REVIEW AND COMMENT AS AN AGREEMENT SECONDARY DOCUMENT A FIELD INVESTIGATION REPORT PURSUANT TO THE SITE-SPECIFIC SST WMA PHASE 1 RFI/CMS WORK PLAN ADDENDA FOR WMA T AND WMA TX-TY.	01/31/2005
M-45-55-T04	SUBMIT TO ECOLOGY FOR REVIEW AND COMMENT A DRAFT FIELD INVESTIGATION REPORT COMBINING THE RESULTS OF FIELD INVESTIGATIONS AND ANALYSIS FOR WMAS A-AX, C & U PURSUANT TO THE SITE-SPECIFIC SST WMA PHASE 1 RFI/CMS WORK PLAN ADDENDA FOR WMA A-AX, C AND U.	01/31/2006
M-045-56	<p>COMPLETE IMPLEMENTATION OF AGREED-TO INTERIM MEASURES.</p> <p>SPECIFIC INTERIM MEASURES WILL BE IMPLEMENTED PURSUANT TO AGREEMENT COMMITMENTS (E.G., SEE INTERIM MILESTONE M-45-57). INTERIM MEASURES MAY ALSO BE REQUIRED BY ECOLOGY, PROPOSED BY DOE IN THE SST WMA RFI REPORT (M-45-55) (OR ENGINEERING STUDIES INCLUDING THAT ADDRESSED IN TARGET MILESTONE M-45-56-T01), OR ESTABLISHED BY AGREEMENT OF THE PARTIES AT ANY TIME DURING THE CORRECTIVE ACTION PROCESS. ALSO SEE TABLE 1 OF AGREEMENT CHANGE CONTROL FORM #M-45-98-03.</p> <p>ECOLOGY AND DOE AGREE, AT A MINIMUM, TO MEET YEARLY (BY JULY OR AS NEEDED TO SUPPORT ANNUAL BUDGETING) FOR THE SPECIFIC PURPOSE OF ASSESSING THE ADEQUACY OF INFORMATION, AND THE NEED FOR THE ESTABLISHMENT OF ADDITIONAL AGREEMENT INTERIM MEASURES. ADDITIONAL AGREEMENT INTERIM MEASURES SHALL BE DOCUMENTED THROUGH ESTABLISHMENT OF INTERIM MILESTONES AND ASSOCIATED TARGET DATES AS AGREED NECESSARY BY THE PARTIES.</p>	To Be Determined
M-045-58	SUBMIT TO ECOLOGY FOR REVIEW AND APPROVAL AS AN AGREEMENT PRIMARY DOCUMENT A CORRECTIVE MEASURES STUDY FOR INTERIM CORRECTIVE MEASURES FOR ALL SST WMA'S (PENDING RESULTS AND CONCLUSIONS IN THE PHASE 1 RFI REPORT-MILESTONE M-45-55 OR SUBSEQUENT RFI REPORTS).	06/30/2007
M-045-59	CONTROL SURFACE WATER INFILTRATION PATHWAYS AS NEEDED TO CONTROL OR SIGNIFICANTLY REDUCE THE LIKELIHOOD OF MIGRATION OF SUBSURFACE CONTAMINATION TO GROUNDWATER AT	To Be Determined

	<p>THE SST WMAS (PENDING THE CMS REPORT, MILESTONE M-45-58, AND IMPLEMENTATION OF OTHER INTERIM CORRECTIVE MEASURES.</p> <p>DECISIONS ON CONTROLLING SURFACE WATER INFILTRATION PATHWAYS WILL BE MADE BY EVALUATING THE ROLE OF SURFACE WATER INFILTRATION AND THE TRANSPORT OF SUBSURFACE CONTAMINATION TO GROUNDWATER. BASED ON THE CORRECTIVE MEASURES STUDY (M-45-58) INTERIM SURFACE BARRIERS AND/OR OTHER INFILTRATION CONTROLS MAY BE REQUIRED.</p>	
M-045-60	<p>SUBMIT TO ECOLOGY FOR REVIEW AND APPROVAL AS AN AGREEMENT PRIMARY DOCUMENT DOE'S RFI/CMS WORK PLAN FOR ALL SST WMAS.</p> <p>THIS RFI/CMS WORK PLAN SHALL DOCUMENT THE ADDITIONAL INTERIM MEASURES AND FURTHER INVESTIGATIONS NEEDED FOR DECISIONS ON RETRIEVAL, CLOSURE, AND CORRECTIVE MEASURES FOR ALL SST WMAS.</p>	09/30/2007