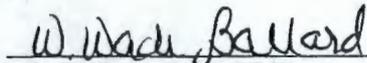
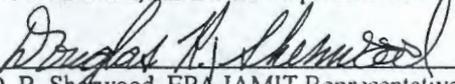
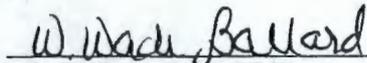
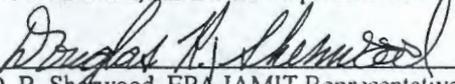
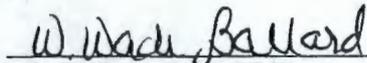
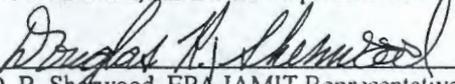


Change Number M-016-01-03	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date August 27, 2001									
Originator R. G. McLeod, RL	Phone 509-372-0096										
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager											
Change Title Delete Existing Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Interim Milestones Associated with the 300-FF-1 Operable Unit (OU) and the 618-4 Burial Ground (M-016-03E and M-16-03F) and replace them with proposed Interim Milestones M-016-03G, M-016-03H, and M-016-03I.											
Description/Justification of Change Changes to Tri-Party Agreement Milestones are depicted as strikeout for deletions and shading for proposed additions. M-16-03E, " Complete remediation of the waste sites in the 300-FF-1 Operable Unit (excluding the 618-4 Burial Ground), to include exexcavation, verification, and backfilling " - September 30, 2001 M-16-03F, " Complete exexcavation, verification, soil and drummed waste treatment and disposal, and backfilling of the 618-4 Burial Ground " TBD Milestone M-16-03G—Establish an Environmental Restoration Disposal Facility (ERDF) staging area that is ready to receive drummed waste from the 618-4 Burial Ground in accordance with an ERDF Record of Decision Amendment --September 30, 2002 Milestone M-16-03H—Complete remediation of the waste sites in the 300-FF-1 Operable Unit to include excavation, verification, and regrading, including the 618-4 Burial Ground in accordance with an approved Remedial Design Report/Remedial Action Work Plan--December 31, 2003 Milestone M-16-03I—Complete treatment of drummed waste from the 618-4 Burial Ground in accordance with an approved Remedial Design Report/Remedial Action Work Plan --TBD Description/Justification of Change begins on page 2.											
Impact of Change Approval of this CR deletes two Tri-Party Agreement Milestones and creates 3 Tri-Party Agreement Interim Milestones.		EDMC									
Affected Documents Hanford Federal Facility Agreement and Consent Order Action Plan Appendix D. Major and Interim Milestones Remedial Design Report/Remedial Action Work Plan for the 300-FF-1 Operable Unit (DOE/RL-96-70)											
Approvals <table border="0"> <tr> <td data-bbox="82 1539 587 1686">  W. W. Ballard, RL IAMIT Representative </td> <td data-bbox="587 1539 766 1686"> 8/28/01 Date </td> <td data-bbox="766 1539 1248 1686"> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved </td> </tr> <tr> <td data-bbox="82 1686 587 1791">  D. R. Sherwood, EPA IAMIT Representative </td> <td data-bbox="587 1686 766 1791"> 8/28/01 Date </td> <td data-bbox="766 1686 1248 1791"> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved </td> </tr> <tr> <td data-bbox="82 1791 587 1890">  M. A. Wilson, Ecology IAMIT Representative </td> <td data-bbox="587 1791 766 1890"> _____ Date </td> <td data-bbox="766 1791 1248 1890"> <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved </td> </tr> </table>			 W. W. Ballard, RL IAMIT Representative	8/28/01 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	 D. R. Sherwood, EPA IAMIT Representative	8/28/01 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	 M. A. Wilson, Ecology IAMIT Representative	_____ Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
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 M. A. Wilson, Ecology IAMIT Representative	_____ Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved									

Description/Justification of Change

As a result of the negotiations between DOE and EPA, the M-16-03E and M-16-03F milestones are now replaced with M-16-03G, M-16-03H, and M-16-03I. The following describes the rationale behind the changes and the assumptions related to the new milestones.

The original milestone for the 300-FF-1 Operable Unit (OU) was M-16-03D, "Complete Remediation of the waste sites in the 300-FF-1 Operable Unit, as defined in the remedial design report/remedial action work plan for the 300-FF-1 Operable Unit" (DOE/RL-96-70), with a completion date of May 31, 1999. The scope for Milestone M-16-03D included excavation of all 300-FF-1 OU waste sites including the 618-4 Burial Ground. Due to the discovery of numerous drums during excavation of the 618-4 Burial Ground, the U.S. Department of Energy, Richland Operations Office (DOE) requested a revision to the M-16-03D milestone in a letter to the U.S. Environmental Protection Agency (EPA) and Washington State Department of Ecology (Ecology) dated February 4, 1999 (CNN 065944). Subsequently, the M-16-03D milestone was divided into two new milestones, M-16-03E, "Complete remediation of the waste sites in the 300-FF-1 Operable Unit (excluding the 618-4 Burial Ground), to include excavation, verification, and backfilling" with a completion date of December 31, 2000 and M-16-03F, "Complete excavation, verification, soil and drummed waste treatment and disposal, and backfilling of the 618-4 Burial Ground" with a completion date of TBD (Control Form M-16-98-05).

All of the excavation work and verification sampling required to support the M-16-03E milestone was completed by August 2000. However, work associated with preparation and approval of closeout verification packages and backfill of the sites was postponed due to questions regarding protectiveness of the cleanup levels for uranium with respect to groundwater and the Columbia River. In September 2000, the M-16-03E milestone due date was extended from December 2000 to September 30, 2001 (Control Form M-16-00-03) based on preliminary scoping of a 300 Area uranium leach/Kd study that would be conducted to verify protectiveness of the uranium cleanup level. In accordance with the preliminary scoping of the leach/Kd study, it was anticipated that test results would be available to support regulatory approvals to proceed with backfill of the excavated 300-FF-1 OU sites by March 31, 2001.

The data quality objective (DQO) process for actual design of the leach/Kd study occurred during the late summer and fall of 2000. During this process, it became evident that more time would be required to obtain valid results from leach and Kd column tests proposed in the study design. The study (i.e. lab tests), along with a draft report, will be completed by August 2002. Consequently, the completion date must be changed.

While the EPA has agreed that the M-16-03E milestone must be changed due to the leach/Kd study schedule, they have expressed a strong desire to include the scope of the M-16-03F milestone (618-4 Burial Ground) with the M-16-03E change. As a result, the M-16-03E and M-16-03F milestones will be deleted and replaced with M-16-03G, M-16-03H, and M-16-03I.

~~Milestone M-16-03G—Establish an Environmental Restoration Disposal Facility (ERDF) staging area that is ready to receive drummed waste from the 618-4 Burial Ground—September 30, 2002.~~

M-016-03G Interim Milestone Schedule:

- ❖ Schedules are for planning purposes only and are not enforceable
- ❖ Prepare/review/approve ERDF ROD amendment; start October 1, 2001 with issuance of the ROD Amendment by March 31, 2002.
- ❖ Update the Safety Analysis Request (SAR); start February 1, 2002 with approval of the SAR by June 1, 2002
- ❖ Design/procure subcontractor/construct the staging area at ERDF; start March 1, 2002 with the staging area ready to receive waste by September 30, 2002.
- ❖ ERDF staging area will be large enough to accommodate 1500+ drums with over packs that constitute secondary containment and will be constructed of compacted gravel.

~~Milestone M-16-03H— Complete remediation of the waste sites in the 300-FF-1 Operable Unit to include excavation, verification, and regrading, including the 618-4 Burial Ground in accordance with an approved Remedial Design Report/Remedial Action Work Plan, December 31, 2003.~~

M-016-03H Interim Milestone Schedule:

- ❖ Schedules are for planning purposes only and are not enforceable
- ❖ Procurement and remediation documentation, August 1, 2001-January 31, 2002
- ❖ Site mobilization and Readiness Review, February 1, 2002
- ❖ Start remediation April, 2002
- ❖ Complete Excavation of defined waste site, September 30, 2002
- ❖ Confirmation sampling/analysis/data validation; start October, 1, 2002 through December 31, 2002
- ❖ Complete uranium leach/Kd study by August 2002; evaluate results, and receive approval to backfill sites without additional excavation by January 2003. Missing the August 2002 date does not constitute "good cause" for extension of the milestone.
- ❖ Start cleanup verification packages (CVP) January 2, 2003
- ❖ Finalize CVP May 31, 2003. CVP for the 618-4 Burial Ground can be issued prior to treatment of drummed waste
- ❖ Regrade, start June 1, 2003 and end by December 31, 2003.

~~Milestone M-16-03I— Complete treatment of drummed waste from the 618-4 Burial Ground in accordance with an approved Remedial Design Report/Remedial Action Work Plan—TBD~~

M-016-03I Milestone Schedule:

- ❖ Schedules are for planning purposes only and are not enforceable
- ❖ The milestone date is a "To Be Determined" (TBD). The TBD date is based on an available technology to treat the contents of the drums encountered at the 618-4 Burial Ground. DOE is presently evaluating the use of an existing contract with Allied Technology Group (ATG) that is being managed by Fluor Hanford as well as some other options.
- ❖ ATG is the owner of the plasma arc system and currently is the only mixed waste facility in America that will be permitted to handle radioactive mixed waste with PCBs (RCRA and TSCA permitted). They are undergoing testing with the State of Washington to revise the treatment permit to include PCBs. Recent information shows a delay in their schedule due to additional requirements for having a third party validation consultant who will not be available to start until mid-summer 2001.
- ❖ It is estimated that ATG would not likely to be able to receive 618-4 waste until October 2002 or later. In the interim, other technologies for treatment continue to be evaluated. The regulators will be kept informed, and the milestone date will be established as soon as possible.