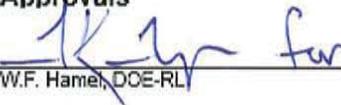
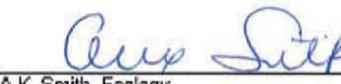


Change Number P-05-19-01	Federal Facility Agreement and Consent Order Change Control Form		Date 06/20/2019
Originator Mostafa Kamal			Phone 376-0289
Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers			
Change Title Modify Tri-Party Agreement (TPA), Action Plan, Section 5.5, Treatment, Storage, and Disposal Units and Past-Practice Units Interface, to Reflect RCRA Closures as Part of CERCLA Actions			
Description/Justification of Change <p>This change control form modifies the TPA Action Plan, Section 5.5, Treatment, Storage, and Disposal Units and Past-Practice Units Interface, to coordinate the development and implementation of closure plans for such Treatment, Storage and Disposal (TSD) units with the investigation and remediation of closely associated past-practice units. This change proposes to change Remedial Investigation/Feasibility Study (RI/FS) to Coordinated Closure (CC) Proposal.</p> <p>This change control form was coordinated with the following change control forms in the Coordinated Closure negotiations:</p> <ul style="list-style-type: none"> • P-03-19-01, Modify TPA, Action Plan, Section 3.3, Past-Practice Units, to Reflect RCRA Closures as Part of CERCLA Actions, • P-06-19-01, Modify TPA, Action Plan, Section 6.1, Treatment, Storage, and Disposal Unit Process, Introduction, • P-07-19-01, Modify TPA, Action Plan, Section 7.4.2, Resource Conservation and Recovery Act Facility Investigation and Remedial Investigation, and • M-37-19-01, Modification of M-037 Series Milestones in TPA Appendix D. 			
Impact of Change No work schedules or milestones are impacted by this change.			
Affected Documents The Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), as amended.			
Approvals			Page 1 of 4
 W.F. Hamel, DOE-RL	Date <u>03/18/2020</u>	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	
 R.G. Hastings, DOE-DRP	Date <u>3/18/20</u>	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	
 A.K. Smith, Ecology	Date <u>3/20/2020</u>	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	
DAVID EINAN Digitally signed by DAVID EINAN Date: 2020.04.14 15:19:12 -07'00' D.R. Einan, EPA	Date _____	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	

Change Control Form P-05-19-01
Page 2 of 4

Authorized Changes

Modifications to the HFFACO are displayed by using double underline to indicate added text and ~~strikeout~~ to indicate deleted text.

5.5 Treatment, Storage, and Disposal Units and Past Practice Units Interface

In some cases, TSD units are closely associated with past-practice units at the Hanford Site, either geographically or through similar processes and waste streams. Although disposition of all TSD such-units must be managed in accordance with Section 6.0, a procedure to coordinate the TSD unit closure and ~~or~~ other applicable dangerous waste permitting activity with the past-practice investigation and or remediation activity is necessary to prevent overlap and duplication of work, thereby economically and efficiently addressing the contamination. In Appendix B, selected TSD groups/units, primarily land disposal units, were have been initially assigned to operable units based on the criteria defined in Section 3.3.

In order to coordinate the development and implementation of closure plans for such TSD units with the investigation and remediation of closely associated past-practice units, DOE will provide Ecology with ~~The~~ information necessary for performing RCRA closures/postclosures within an operable unit will be provided in various RFI/CMS documents to satisfy any outstanding closure plan requirements under WAC 173-303-610(3) in the form of one or more Coordinated Closure (CC) Proposals. Each CC Proposal will be submitted to Ecology as a permit modification request in accordance with WAC 173-303-830(4) and in conjunction with the submission of the associated past-practice document(s) to the lead regulatory agency for the operable unit, pursuant to the applicable milestone(s) set forth in Appendix D.¹

The type of information required for each CC Proposal will depend on the category of past-practice documents with which it is associated. Unless otherwise agreed to in writing by DOE and Ecology, the timing and content of each CC proposal shall be consistent with the following requirements:

1. Coordination with Proposed Plan and/or Proposed Correction Action Decision

To request the use of alternative requirements under WAC 173-303-610(1)(e), DOE must provide Ecology with a CC Proposal for the applicable TSD unit(s) in conjunction with its submission of the Proposed Plan and/or Proposed Corrective Action Decision for the associated operable unit. CC Proposals submitted in accordance with this paragraph must:

¹ In the event that there is a conflict between the requirements of Appendix I and the requirements of this Section as applied to the Single-Shell Tank System, the requirements of Appendix I shall control.

Change Control Form P-05-19-01
Page 3 of 4

- Set forth the justification for the use of alternative requirements as required by WAC 173-303-610(1)(e)(i)–(ii);
- Identify which closure requirements are proposed to be replaced with alternative requirements and describe the alternative requirements that would apply, to the extent such information is available, as required by WAC 173-303-610(3)(a)(ix); and
- Explain how closure of the TSD unit(s) using the proposed alternative requirements will comply with the closure performance standard set forth in WAC 173-303-610(2)(a), as required by WAC 173-303-610(3)(a)(i).

2. Coordination with Remedial Design/Remedial Action Work Plan and/or Corrective Measures Implementation Work Plan

For all TSD units being closed in coordination with closely associated past-practice units, DOE must provide Ecology with a CC Proposal for the applicable TSD unit(s) in conjunction with its submission of the Remedial Design/Remedial Action Work Plan and/or Corrective Measures Implementation Work Plan for the associated operable unit. Each CC Proposal submitted in accordance with this paragraph must:

- Provide all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii)²;
- Provide all outstanding post-closure information required by WAC 173-303-610(8)(b), as applicable; and
- If DOE has requested the use of alternative requirements for closure of the applicable TSD unit(s) under WAC 173-303-610(1)(e), provide all outstanding information required by WAC 173-303-610(3)(a)(ix).

~~The initial workplan will contain a Sampling and Analysis Plan (SAP) for the associated RCRA units and it will outline the manner in which RCRA closure/postclosure plan requirements will be met in the work plan and subsequent documents. The selected closure/postclosure method and associated design details will (unless otherwise agreed to by the parties) be submitted as part of the CMS report at a later date, as specified in the work plan.~~

² Because DOE does not use trust funds to establish financial assurance, WAC 173-303-610(3)(a)(viii) does not apply. In addition, if DOE has requested the use of alternative requirements for closure of the applicable TSD unit(s), the extent of information required by WAC 173-303-610(3)(a)(i)–(vii) will be determined by the scope of the Director’s determination made for the applicable TSD unit(s) pursuant to WAC 173-303-610(1)(e).

Change Control Form P-05-19-01
Page 4 of 4

The information proposed closure/postclosure activities contained in a CC Proposal must the CMS report will: (1) meet RCRA closure standards and requirements include all information required by the milestone and/or permit condition under which the CC Proposal is submitted, (2) be consistent with closure requirements specified elsewhere in the Hanford Site-Wide (RCRA) permit, and (3) be coordinated with the recommended remedial action(s) for the associated operable unit and any applicable post-closure care requirements. Additionally, the closure/post-closure implementation schedule will reflect an overall prioritization between closure/post-closure and other remedial activities within the subject operable unit, considering environmental protection, health and safety, availability of technology, etc.

Each CC Proposal RFI/CMS closure document will must be structured such that RCRA closure requirements can be readily identified as separate and distinct from the CERCLA or RCRA Corrective Action requirements contained in the past-practice document(s), for a separate review/approval process and so that all applicable RCRA closure/post-closure requirements can be easily incorporated into the existing closure plan(s) for the applicable TSD unit(s) in the RCRA Permit. If at a later date TSD groups/units need to be deleted from or added to an operable unit, the procedures defined in Section 12.2 will be used.

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 and, as appropriate, HSWA corrective measures will comply with ARARs.