



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

May 17, 2010

Mr. Matthew S. McCormick  
Assistant Manager for the Central Plateau  
Richland Operations Office  
United States Department of Energy  
P.O. Box 550, MSIN: A7-50  
Richland, Washington 99352

**RECEIVED**  
MAY 19 2010  
**EDMC**

Re: Hanford Federal Facility Agreement and Consent Order (HFFACO) Change Control Forms  
B-10-01 and C-10-01

Dear Mr. McCormick:

Enclosed are copies of two signed HFFACO Change Control Forms. Change Control Form Number B-10-01 deletes the 216-A-10 Crib from HFFACO Appendix B. Change Control Form Number C-10-01 removes the double asterisk (indicating a TSD unit) for the 216-A-10 crib.

If you have any questions, please call Nina Menard at 509-372-7941.

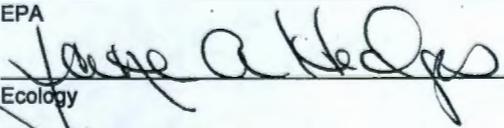
Sincerely,

Jane A. Hedges  
Program Manager  
Nuclear Waste Program

lkd  
Enclosures

cc w/enc: Dennis Faulk, EPA  
Ron Morrison, MSA  
Stuart Harris, CTUIR  
Russell Jim, YN  
Gabriel Bohnee, NPT

Lela Buck, Wanapum  
Susan Leckband, HAB  
Ken Niles, ODOE  
**Administrative Record**  
Environmental Portal  
USDOE-RL Correspondence Control

<b>Change Number</b>  <b>B-10-01</b>	<b>Federal Facility Agreement and Consent Order  Change Control Form</b> <small>Do not use blue ink. Type or print using black ink.</small>	<b>Date</b>  April 9, 2010
<b>Originator</b>  Briant L. Charboneau, U.S. Department of Energy		<b>Phone</b>  (509) 373-6137
<b>Class of Change</b>  <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
<b>Change Title</b>  Delete the 216-A-10 Crib from Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Appendix B.		
<b>Description/Justification of Change</b>  The 216-A-10 Crib Dangerous Waste Part A, Permit Application, Revision 5 (Part A form), identifies the crib was used to dispose of Plutonium-Uranium Extraction (PUREX) process distillate discharge (PDD) that was a corrosive mixed waste. This crib is documented to have received only PUREX PPD waste during operations. The Part A form states that this site received its last waste in March 1987. As agreed to by the U.S. Department of Energy and the State of Washington, Department of Ecology the date that the mixed waste rule applies is August 19, 1987, and any discharges occurring before this effective date would constitute a past practice activity. Documentation in the form of as-built drawings signed and dated April 1, 1987; verify the completion of piping modifications that physically isolated the 216-A-10 Crib from further receipt of waste. Because the 216-A-10 Crib received only mixed waste and ceased operations before August 19, 1987, this unit never received waste after the date that the mixed waste rule applies. Consequently, the 216-A-10 Crib is reclassified as a past practice waste site from that of a TSD. This modification of Tri-Party Agreement Action Plan Appendix B deletes the 216-A-10 Crib from the listing of TSD groups/units.  <i>Description/Justification of Change continued on page 2 of 2.</i>		
<b>Impact of Change</b>  This is an Administrative change to Appendix B which will not impact Tri-Party Agreement milestones or schedules.		
<b>Affected Documents</b>  The <u>Hanford Federal Facility Agreement and Consent Order</u> , as amended, and Hanford Site internal planning, management and budget documents (e.g., baseline control documents, related work authorization and directives).		
<b>Approvals</b>  <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;">   DOE </div> <div style="width: 30%;"> 5/7/2010 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved  Date </div> <div style="width: 30%;"></div> </div> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> N/A  EPA </div> <div style="width: 30%;"> <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved  Date </div> <div style="width: 30%;"></div> </div> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;">   Ecology </div> <div style="width: 30%;"> 5/14/2010 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved  Date </div> <div style="width: 30%;"></div> </div>		

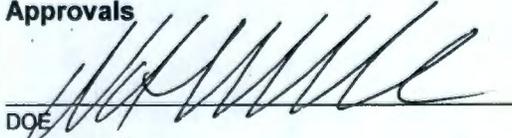
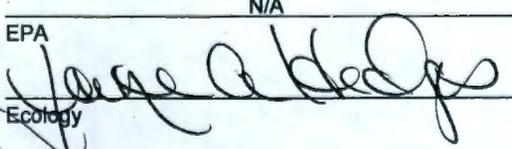
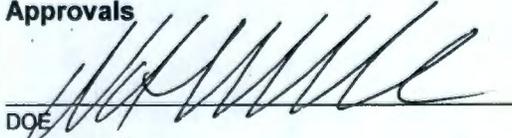
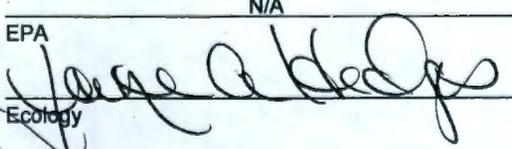
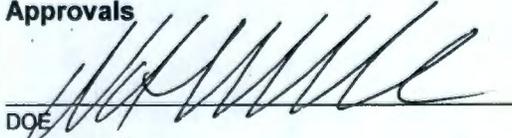
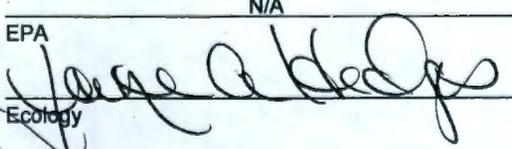
*Description/Justification of Change continued*

Modifications, made by this change form, to Tri-Party Agreement Action Plan Appendix B are displayed with ~~strikeout~~ to indicate deleted text.

**APPENDIX B**

**Listing of Treatment, Storage, and Disposal Groups/Units**

<u>Treatment, Storage, and Disposal</u>			<u>Planned Action</u>	
<u>Group Number</u>	<u>Groups/Units</u>	<u>Operable Unit (if applicable)</u>	<u>Closure*</u>	<u>Operating Permit</u>
<del>D-2-2</del>	<del>216 A-10 Crib</del>	<del>200 PO-2</del>	<del>X</del>	

<b>Change Number</b>  <b>C-10-01</b>	<b>Federal Facility Agreement and Consent Order Change Control Form</b> <small>Do not use blue ink. Type or print using black ink.</small>	<b>Date</b>  April 9, 2010												
<b>Originator</b>  Briant L. Charboneau, U.S. Department of Energy		<b>Phone</b>  (509) 373-6137												
<b>Class of Change</b>  <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager														
<b>Change Title</b>  Remove Double Asterisk (indicating a TSD unit) for the 216-A-10 Crib in Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Appendix C.														
<b>Description/Justification of Change</b>  The 216-A-10 Crib Dangerous Waste Part A, Permit Application, Revision 5 (Part A form), identifies the crib was used to dispose of Plutonium-Uranium Extraction (PUREX) process distillate discharge (PDD) that was a corrosive mixed waste. This crib is documented to have received only PUREX PPD waste during operations. The Part A form states that this site received its last waste in March 1987. As agreed to by the U.S. Department of Energy and the State of Washington, Department of Ecology the date that the mixed waste rule applies is August 19, 1987, and any discharges occurring before this effective date would constitute a past practice activity. Documentation in the form of as-built drawings signed and dated April 1, 1987; verify the completion of piping modifications that physically isolated the 216-A-10 Crib from further receipt of waste. Because the 216-A-10 Crib received only mixed waste and ceased operations before August 19, 1987, this unit never received waste after the date that the mixed waste rule applies.  <p style="text-align: center;"><i>Description/Justification of Change continued on page 2 of 2.</i></p>														
<b>Impact of Change</b>  This is an Administrative change to Appendix C which will not impact Tri-Party Agreement milestones or schedules.														
<b>Affected Documents</b>  The <u>Hanford Federal Facility Agreement and Consent Order</u> , as amended, and Hanford Site internal planning, management and budget documents (e.g., baseline control documents, related work authorization and directives).														
<b>Approvals</b>  <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; vertical-align: bottom;">             DOE         </td> <td style="width: 20%; vertical-align: bottom;">           Date <u>5/7/2010</u> </td> <td style="width: 20%; vertical-align: bottom;"> <input checked="" type="checkbox"/> Approved    <input type="checkbox"/> Disapproved         </td> <td style="width: 30%;"></td> </tr> <tr> <td style="text-align: center; vertical-align: top;">N/A</td> <td></td> <td style="vertical-align: top;"> <input type="checkbox"/> Approved    <input type="checkbox"/> Disapproved         </td> <td></td> </tr> <tr> <td style="vertical-align: bottom;">             EPA Ecology         </td> <td style="vertical-align: bottom;">           Date <u>5/14/2010</u> </td> <td style="vertical-align: bottom;"> <input checked="" type="checkbox"/> Approved    <input type="checkbox"/> Disapproved         </td> <td></td> </tr> </table>			 DOE	Date <u>5/7/2010</u>	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved		N/A		<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved		 EPA Ecology	Date <u>5/14/2010</u>	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
 DOE	Date <u>5/7/2010</u>	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved												
N/A		<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved												
 EPA Ecology	Date <u>5/14/2010</u>	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved												

*Description/Justification of Change continued*

Consequently, the 216-A-10 Crib is reclassified as a past practice waste site from that of a TSD. This modification of Tri-Party Agreement Action Plan Appendix C deletes the double asterisks (indicating a TSD unit) from the 216-A-10 Crib entry in Appendix C.

Modifications, made by this change form, to Tri-Party Agreement Action Plan Appendix C are displayed with ~~strikeout~~ to indicate deleted text.

**Appendix C**

Listing by Operable Unit.

<b>OPERABLE UNIT</b>	<b>LEAD REGULATORY AGENCY</b>		
<b>Waste Unit Name</b>	<b>Waste Unit Aliases</b>	<b>Unit Type</b>	<b>Status</b>
216-A-10**	216-A-10, 216-A-10 Crib	Crib	

(Note: The strikethrough appearing just below the double asterisk is indicating the deletion of the double asterisk.)

\*\* Treatment Storage and Disposal (TSD) units where closure and permitting activities are to be coordinated with past practice investigation and remediation activities.

(This Appendix C footnote, explaining the use of the double asterisk, is displayed above for information only)