

**START**

Change Number <b>M-20-94-05</b>	<b>Federal Facility Agreement and Consent Order                  Change Control Form</b> Do not use blue ink. Type or print using black ink.	Date <b>May 1, 1995</b>
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Originator <b>Moses Jaraysi</b>	Phone <b>376-3016</b>
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Class of Change  
 I - Signatories     
  II - Project Manager     
  III - Unit Manager

Change Title  
**Milestone M-20-00 Modification (1994 ER Refocusing Negotiations)**

Description/Justification of Change  
Justification of Change:  
 The current milestone M-20-00 (and its associated interim milestones) needs substantial revision to assure that it: (a) covers all regulated units; (b) adequately reflects developing agreements to coordinate hazardous waste facility closure/postclosure with operable unit remediation; (c) accurately reflects regulatory status or necessary coordination with developing transition efforts; and (d) adequately reflect stakeholder values.  
 See attached Description/Justification of Change continued on Page 2.

Impact of Change  
 Proposed changes will result in the following:

1. The completion date of milestone M-20-00 is modified from May 1996 to February 2000;
2. Reassignment of scope and deletion of milestones M-20-31, M-20-34, M-20-35, and M-20-38;
3. Addition of new interim milestones M-20-52 to M-20-54; and
4. The completion date of milestones M-20-33, -36, -37, and -39 are changed.

Affected Documents  
 Hanford Federal Facility Agreement and Consent Order, Action Plan and Appendices B, C and D.

Approvals <i>John W. Waynes</i> JOE	5/1/95 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
EPA <i>Cheryl Clark</i>	5/8/95 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Ecology <i>Mary Rumlana</i>	5/9/95 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved



Description/Justification of Change (continued)

Justification of Change (continued):

Proposed changes are expected to aid the parties in complying with the Tri-Party Agreement and Cost and Management Efficiency Initiative, and in coordinating the application of RCRA and the State Hazardous Waste Management Act (HWMA) with CERCLA and RCRA Past Practice site remediation. The submittal of Hazardous Waste Facility Treatment, Storage and/or Disposal (TSD) Unit Closure/Postclosure Plans in coordination with Operable Unit Work Plans (and associated documents) is expected to optimize the efficiency of site characterization and cleanup activities. This coordinated approach is expected to result in cost and resource savings such that funding can be redirected for cleanup activities along the Columbia River (e.g. documentation, site characterization, cleanup). Specific agreements for coordinating TSD Closure/Postclosure Plans with Operable Unit Work Plans are outlined in TPA change request numbers M-13-94-03 and M-15-94-04.

The RFI/CMS, Closure/Postclosure Work Plan will be the first of several necessary submittals for completing the RFI/CMS and RCRA closure/postclosure processes for an individual operable unit. It will include a schedule for the submittal of subsequent documents.

The information necessary for performing RCRA closures/postclosures within an operable unit will be provided in various RFI/CMS documents. The initial work plan 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. The proposed closure/postclosure activities contained in the CMS report will meet RCRA closure/postclosure standards and requirements, and will be coordinated with the recommended remedial action for the associated operable unit. Additionally, the closure/postclosure implementation schedule will reflect an overall prioritization between closure/postclosure and other remedial activities within the subject operable unit, considering environmental protection, health & safety, and availability of technology.

Each RFI/CMS, Closure/Postclosure document will be structured such that RCRA closure/postclosure requirements can be readily identified for a separate review/approval process so that RCRA closure/postclosure requirements can be incorporated in the RCRA Permit.

Coordination of RCRA closures/postclosures at operable units where a work plan has already been prepared will require either a revision to the work plan or an addition to a subsequent RFI/CMS document that outlines the manner in which RCRA Closure/Postclosure Plan requirements will be met in the overall sequence of documents.

The purpose of combining RCRA closure/postclosure requirements is to ensure consistent, effective, and non-duplicative cleanup. USDOE, EPA and Ecology have agreed to a number of early attempts (the 100-N Area Pilot Project, 200-BP-11) to determine whether this approach to satisfying RCRA and CERCLA requirements is viable. Each of the parties reserve their right to reject this approach if that party believes that it does not adequately ensure compliance with applicable requirements. If rejected, the parties agree to negotiate acceptable document submittal schedules.

## Description/Justification of Change (continued)

In addition, the parties have agreed to establish a regulatory course of action to take major Hanford facilities through transition in preparation for Decontamination and Decommissioning (D&D). Each of these facilities will require a regulatory course of action (e.g. Closure/Postclosure, Part B Application(s), and/or a transition plan). Proposed M-20-00 milestones are designed to guide these evaluations. Additional M-20-00 milestone changes are expected as a result of current Facility Transition negotiations. Approval of this change request constitutes scope reassignment of milestones M-20-34 (reassigned to M-20-33), M-20-38 (reassigned to M-20-36), M-20-31 (reassigned to M-15-12B) and M-20-35 (reassigned to M-15-12C). Please refer to change request M-15-94-04.

Description of Change:

## 1. PROPOSED MODIFICATIONS RELATED TO NEW UNITS:

MILESTONE	DESCRIPTION	DUE DATE
M-20-00	Submit Part B Permit Applications or Closure/Postclosure Plans for all RCRA TSD Units. Permit applications, closure and postclosure plans will be submitted to Ecology and/or EPA for approval in accordance with their respective authorities. Individual unit submittals (enforceable as interim milestones) will occur as shown in Appendix D.	02/28/2000
M-20-52	Submit 216-A-37-1 Crib Closure/Postclosure Plan to Ecology and EPA in coordination with the Work Plan of Operable Unit 200-P0-4 (to be satisfied by M-13-12).*	10/31/1998
M-20-53	Submit 207-A Retention Basin Closure/Postclosure Plan to Ecology and EPA in coordination with the Work Plan of Operable Unit 200-P0-5 (to be satisfied by M-13-16).*	10/31/1999
M-20-54	Submit 241-CX Tank System Closure/Postclosure Plan to Ecology and EPA in coordination with the Work Plan of Operable Unit 200-S0-1 (to be satisfied by M-13-17).*	02/28/2000

\* See Change Request M-13-94-03

Description/Justification of Change (continued)

## 2. PROPOSED MODIFICATIONS RELATED TO ENVIRONMENTAL RESTORATION:

MILESTONE	DESCRIPTION	DUE DATE
M-20-32	Submit documents for 300 Area Process Trenches that address closure/postclosure requirements to Ecology and EPA in coordination with the Phase III Feasibility Study for OU 300-FF-1.	08/15/1994
M-20-33	Submit 216-A-10 Crib and 216-A-36B Crib Closure/Postclosure Plans to Ecology and EPA in coordination with the Work Plan for Operable Unit 200-PO-2 (to be satisfied by M-13-11).	06/30/1998
M-20-36	Submit 216-A-29 Ditch and 216-B-63 Trench Closure/Postclosure Plans to Ecology and EPA in coordination with the Work Plan for Operable Unit 200-BP-11 (to be satisfied by M-13-07).	06/30/1995
M-20-37	Submit 216-U-12 Crib Closure/Postclosure Plan to Ecology and EPA in coordination with the LFI Report for Operable Unit 200-UP-2.	06/30/1995
M-20-39	Submit 216-S-10 Pond and Ditch Closure/Postclosure Plan to Ecology and EPA in coordination with the Work Plan for Operable Unit 200-RO-1 (to be satisfied by M-13-15).	06/30/1999