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Change Number M-45-16-01 Rev. 1	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date August 9, 2016
Originator G.D. Trenchard, ORP		Phone (509) 373-4016
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Modify M-045 Closure Milestones for WMA C Closure		
Description/Justification of Change This Hanford Federal Facility Agreement and Consent Order (HFFACO) Change Control Form (change control form) modifies the M-045-82 milestone to submit the draft Tier 2 closure plan and creates a new milestone (M-045-82A) to submit the draft Tier 3 closure plans for the C-200 tanks for WMA-C. Milestones M-045-83 (Complete Closure of WMA C) and M-045-62, (Submit a draft Tier 3 closure plan to implement corrective measures identified in the approved Phase 2 RCRA Corrective Measures Study for WMA-C Phase 2 Corrective Measures Implementation Work Plan for WMA C) are also modified. <i>(continued on next page)</i>		
Impact of Change This Hanford Federal Facility Agreement and Consent Order Change Control Form (change control form) modifies milestones M-045-62, M-045-82 and M-045-83.		
Affected Documents The HFFACO, 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).		
Approvals <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><i>[Signature]</i> DOE GLYN TRENCHARD</p> <p><i>Per email from Dennis Fank EPA defers to Ecology for approval</i></p> <p>EPA <i>[Signature]</i></p> <p>Ecology</p> </div> <div style="width: 35%;"> <p><u>3-28-17</u> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved</p> <p>Date</p> <p><u>3/30/17.</u> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved</p> <p>Date</p> </div> </div>		<p>Page 1 of 3</p>

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The Tier 1 closure plan is removed from the milestone description because it was submitted to Ecology and ORP is in the process of responding to Ecology comments on the submittal.

Good cause exists, per HFFACO Article XL, Paragraph 120E, to modify the three existing milestones and create one new milestone for submittal of documents and closure of WMA C.

The closure approach set forth in this change control form establishes an incremental approach to tank closure which:

1. Allows lessons learned from one closure to be applied to the planning of the next closure; and
2. Demonstrates progress towards WMA C closure in a way that promotes momentum for remaining WMA C goals.

Under the closure approach set forth in this change control form, closure of the 241-C-200 Series tanks would occur first. The 241-C-200 series tanks were selected as the first Single-Shell Tanks to be closed based on:

1. Ease of access (the tanks are located at the farm edge, and access from outside the farm would be possible for closure activities);
2. The tanks are prime candidates for the first demonstration of the closure approach.
3. Reduced obstructions and a decreased amount of closure equipment required to be located within the farm.

The closure of additional components within WMA C would follow in the sequence as additional closure decisions are made, lessons learned are incorporated, and closure designs are developed.

Approval of this change control form resolves the dispute on change control form M-45-15-03.



M-45-16-01 Authorized Changes

Modifications to Tri-Party Agreement text is displayed as double underline to indicate added text and ~~strikeout~~ to indicate deleted text.

<p>M-045-82</p> <p>Lead Agency: Ecology</p>	<p>Submit complete permit modification requests for Tiers 1, 2, & 3 (see Appendix I) of the SST System, to support final closure requirements for WMA C.</p> <p><u>Submit to Ecology for review, in accordance with HFFACO Action Section 9.2.2, the draft Tier 2 closure plan for WMA C. The Tier 2 plan shall include a proposed TPA milestone change control form identifying all Tier 3 submittal dates for WMA C, and proposed target dates to initiate Tier 3 closure activities. Target dates will be converted to enforceable schedules through permit modification to incorporate Tier 3 closure plans.</u></p>	<p>9/30/2015</p> <p><u>5/15/2017</u></p>
<p><u>M-045-82A</u></p> <p><u>Lead Agency:</u> <u>Ecology</u></p>	<p><u>Submit to Ecology for review, in accordance with HFFACO Action Section 9.2.2, the draft Tier 3 closure plans for the C-200 tanks (C-201, C-202, C-203, and C-204) including schedules.</u></p>	<p><u>5/15/2017</u></p>
<p>M-045-62</p> <p><u>Lead Agency:</u> <u>Ecology</u></p>	<p>Submit to Ecology for review, <u>in accordance with HFFACO Action Section 9.2.2, the draft Tier 3 closure plan to implement corrective measures identified in the approved and approval as an Agreement</u> primary document a Phase 2 Corrective Measures Implementation Work Plan (CMIP) for WMA C.</p>	<p>Six (6) months after the approval of the CMS submitted under milestone M-045-61A.</p> <p><u>To be established in accordance with the date identified in the M-45-82 Tier 2 closure plan</u></p>

<p>M-045-83</p> <p>Lead Agency: Ecology</p>	<p>Complete the Closure of WMA C- <u>by completing all closure activities specified in the Tier 2 closure plan, not including activities specifically described in the Tier 2 closure plan as requiring integration with closure of other WMAs.</u></p> <p>The milestone date assumes Ecology will issue a final permit modification decision within 12 months of receiving DOE's modification request under M-045-82. If Ecology does not issue a final permit modification decision within 12 months of receiving DOE's modification request under M-045-82, the milestone date will be extended on a day-for-day basis for each day beyond the 12 month period until a final permit modification decision is issued.</p>	<p><u>06/30/2019</u></p> <p><u>To be established in accordance with the date identified in the M-45-82 Tier 2 closure plan</u></p>
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