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Change Number M-20-91-5	FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM Do not use blue ink. Type, or print using black ink.	Date 10-25-91
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Originator L. L. Powers	Phone 376-6204
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Class of Change

I - Signatories (Section 13.0) II - Project Manager III - Unit Manager

Change Title
REVISE RCRA PERMIT/CLOSURE PLAN REVIEW CYCLES

Description/Justification of Change

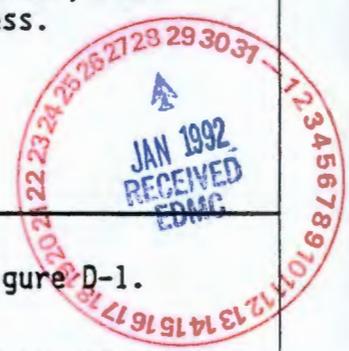
The Part B permit application and closure plan review and revision cycles will be adjusted as follows:

	Part B Applications	Closure Plans
1. Ecology Review (Rev. 0)	120 days	90 days
2. DOE Response (NOD Response Table)	120 days	90 days
3. Ecology Review Response Table	120 days	90 days
4. Unit Managers Issue Resolution	90 days	60 days
5. DOE Issue Revision 1	120 days	90 days
6. Ecology Review Revision 1	120 days	90 days
7. DOE Response (NOD Response Table)	120 days	90 days
8. Ecology Review	90 days	60 days

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Impact of Change

The change will enhance each agency's ability to plan resource requirements to reflect actual planned workloads. This will ensure that the appropriate resources are available by all three agencies to meet practical permitting/closure plan schedules. The revised schedules will not cause delays to the issuance of permits or approvals of closure plans. Rather, the revised schedules reflect the realities of the review/response process.



Affected Documents

Hanford Federal Facility Agreement and Consent Order Action Plan Figure D-1.

Approvals	___ Approved	<input checked="" type="checkbox"/> Disapproved	<p>Steve: The review schedules are set in Sec. 9.0 of the TPA Action Plan. They are not subject to modification via this change control form. This can be accomplished next time the TPA is subject to modification by the signatories.</p> <p><i>Paul Day</i> 12/10/91</p>
DOE	<i>[Signature]</i>	12/6/91 Date	
EPA	<i>[Signature]</i>	12/10/91 Date	
Ecology		Date	

9.	Unit Managers Issue Resolution	90 days	60 days
10.	DOE Issue Revision 2	90 days	60 days
11.	Ecology Review	90 days	60 days
12.	DOE Response (NOD Response Table)	90 days	60 days
13.	Ecology Review	90 days	60 days
14.	Unit Managers Issue Resolution	90 days	60 days
15.	DOE Page Change Revisions	90 days	60 days
16.	Public Review/Draft Permit	90 days	60 days

The above cycles reflect the typical response times which have been experienced during the last two years. Adjusting the schedules to reflect the review/response timeframes actually being experienced will enable each agency (DOE-RL, Ecology, and EPA) to better plan resource requirements as well as providing schedules to the public which show anticipated permitting/closure plan activities. The adjustment of the review cycles also minimizes the need for routine letters between Ecology and DOE-RL requesting and granting schedule extensions for the Ecology document review and for the DOE-RL response to comments received.

In the two years since the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) was originally issued, the permit/closure plan review and response timeframes have consistently been extended by all parties. The proposed schedule change will not increase the overall time required to reach the point of permit issuance or closure plan approval but rather only reflects the actual steps (and timeframes) which are being followed.

The attached version of the Hanford Federal Facility Agreement and Consent order Action Plan Work Schedule depicts incorporation of the above target dates.