



**Department of Energy**  
 Richland Operations Office  
 P.O. Box 550  
 Richland, Washington 99352

10-AMCP-0135

MAY 07 2010

Ms. J. A. Hedges, Program Manager  
 Nuclear Waste Program  
 State of Washington  
 Department of Ecology  
 3100 Port of Benton  
 Richland, Washington 99354

**RECEIVED**  
 MAY 17 2010

**EDMC**

Dear Ms. Hedges:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) CHANGE FORMS B-10-1 AND C-10-01

This letter responds to the State of Washington Department of Ecology's (Ecology) March 30, 2010, return of the Permit Application Part A Form for the 216-A-Crib [TSD: D-2-2].

In accordance with Ecology's disposition, the 216-A-10 Crib will no longer be subject to regulation as a dangerous waste management unit. The 216-A-10 Crib will continue to be classified as a solid waste management unit and subject to corrective action for releases from solid waste management units.

Tri-Party Agreement Change Forms B-10-1, Delete the 216-A-10 Crib from Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Appendix B, and C-10-01, 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 are attached for your approval.

If you have any questions, please contact me, or your staff may contact Briant Charboneau, of my staff, on (509) 373-6137

Sincerely,

Matthew S. McCormick, Assistant Manager  
 for the Central Plateau

AMCP:FMR

Attachments

cc: See Page 2

D.2.2

MAY 07 2010

cc w/attachs:

D. Bartus, EPA  
G. Bohnee, NPT  
L. Buck, Wanapum  
G. P. Davis, Ecology  
D. A. Faulk, EPA  
S. Harris, CTUIR  
R. Jim, YN  
S. L. Leckband, HAB  
N. Menard, Ecology  
R. D. Morrison, MSA  
K. Niles, ODOE  
J. B. Price, Ecology  
D. Rowland, YN  
E. R. Skinnerland, Ecology  
Ecology NWP Library  
**Administrative Record**  
Environmental Portal

cc w/o attachs:

D. G. Black, CHPRC  
M. H. Doornbos, CHPRC  
L. L. Fritz, MSA  
M. N. Jaraysi, CHPRC  
A. G. Miskho, CHPRC  
D. L. Norman, CHPRC  
R. E. Piippo, MSA  
S. A. Thompson, MSA  
J. G. Vance, MSA  
C. B. Walker, CHPRC

|                                 |  |                              |
|---------------------------------|--|------------------------------|
| <b>Change Number</b><br>B-10-01 | <b>Federal Facility Agreement and Consent Order<br/>Change Control Form</b><br>Do not use blue ink. Type or print using black ink. | <b>Date</b><br>April 9, 2010 |
|---------------------------------|--|------------------------------|

|  |                                |
|--|--------------------------------|
| <b>Originator</b><br>Briant L. Charboneau, U.S. Department of Energy | <b>Phone</b><br>(509) 373-6137 |
|--|--------------------------------|

**Class of Change**

I - Signatories                       II - Executive Manager                       III - Project Manager

**Change Title**

Delete the 216-A-10 Crib from Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Appendix B.

**Description/Justification of Change**

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.

*Description/Justification of Change continued on page 2 of 2.*

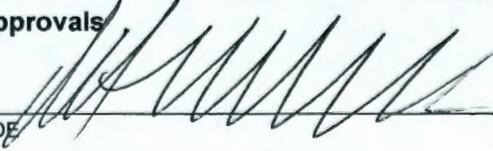
**Impact of Change**

This is an Administrative change to Appendix B which will not impact Tri-Party Agreement milestones or schedules.

**Affected Documents**

The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning, management and budget documents (e.g., baseline control documents, related work authorization and directives).

**Approvals**

|  |          |                                     |          |                          |             |
|--|----------|-------------------------------------|----------|--------------------------|-------------|
|  | 5/7/2010 | <input checked="" type="checkbox"/> | Approved | <input type="checkbox"/> | Disapproved |
| DOE  | Date     |                                     |          |                          |             |
| N/A  |          |                                     | Approved |                          | Disapproved |
| EPA  | Date     |                                     |          |                          |             |
|  |          |                                     | Approved |                          | Disapproved |
| Ecology  | Date     |                                     |          |                          |             |

Page 1 of 2

*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

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| <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><br><br><b>C-10-01</b>   | <b>Federal Facility Agreement and Consent Order<br/>Change Control Form</b><br><small>Do not use blue ink. Type or print using black ink.</small> | <b>Date</b><br><br>April 9, 2010             |  |                  |  |                                      |  |            |      |                                   |                                      |  |         |      |                                   |                                      |  |
| <b>Originator</b><br><br>Briant L. Charboneau, U.S. Department of Energy   |   | <b>Phone</b><br><br>(509) 373-6137           |  |                  |  |                                      |  |            |      |                                   |                                      |  |         |      |                                   |                                      |  |
| <b>Class of Change</b><br><br><input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager   |   |  |  |                  |  |                                      |  |            |      |                                   |                                      |  |         |      |                                   |                                      |  |
| <b>Change Title</b><br><br>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><br><br>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.<br><br><p style="text-align: center;"><i>Description/Justification of Change continued on page 2 of 2.</i></p>   |   |  |  |                  |  |                                      |  |            |      |                                   |                                      |  |         |      |                                   |                                      |  |
| <b>Impact of Change</b><br><br>This is an Administrative change to Appendix C which will not impact Tri-Party Agreement milestones or schedules.   |   |  |  |                  |  |                                      |  |            |      |                                   |                                      |  |         |      |                                   |                                      |  |
| <b>Affected Documents</b><br><br>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><br><br><table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 35%; border-bottom: 1px solid black;"> <br/>           DOE         </td> <td style="width: 15%; border-bottom: 1px solid black;">           5/7/2010<br/>           Date         </td> <td style="width: 15%; border-bottom: 1px solid black;"> <input checked="" type="checkbox"/> Approved         </td> <td style="width: 15%; border-bottom: 1px solid black;"> <input type="checkbox"/> Disapproved         </td> <td style="width: 20%;"></td> </tr> <tr> <td style="border-bottom: 1px solid black;">           N/A<br/>           EPA         </td> <td style="border-bottom: 1px solid black;">           Date         </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> Approved         </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> Disapproved         </td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;">           Ecology         </td> <td style="border-bottom: 1px solid black;">           Date         </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> Approved         </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> Disapproved         </td> <td></td> </tr> </table> |   |  | <br>DOE | 5/7/2010<br>Date | <input checked="" type="checkbox"/> Approved | <input type="checkbox"/> Disapproved |  | N/A<br>EPA | Date | <input type="checkbox"/> Approved | <input type="checkbox"/> Disapproved |  | Ecology | Date | <input type="checkbox"/> Approved | <input type="checkbox"/> Disapproved |  |
| <br>DOE   | 5/7/2010<br>Date  | <input checked="" type="checkbox"/> Approved | <input type="checkbox"/> Disapproved   |                  |  |                                      |  |            |      |                                   |                                      |  |         |      |                                   |                                      |  |
| N/A<br>EPA   | Date  | <input type="checkbox"/> Approved            | <input type="checkbox"/> Disapproved   |                  |  |                                      |  |            |      |                                   |                                      |  |         |      |                                   |                                      |  |
| Ecology  | Date  | <input 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)