

Change Number M-91-01-02	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date March 19, 2001
Originator Ecology		Phone
Class of Change] I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Modification of HFFACO requirements for the thermal treatment of currently stored and newly generated contact Handled (CH) Low-Level Mixed Waste (LLMW) (Interim Milestone series M-91-12).		
Description/Justification of Change On the Federal level, 40 CFR Part 268 restricts the storage and land disposal of hazardous wastes and specifies strict treatment standards that must be met before these wastes can be land disposed (Washington is an Authorized State for RCRA). In some cases the treatment requirements are stated in the form of a specific technology requirement rather than a concentration based treatment standard. Various types of thermal treatment processes are specified in the regulations and are generally required to treat wastes containing dioxins, furans and/or Phenols, organics and lab packs. The HFFCAO requires that DOE mixed waste also meet the LDR standards = Continued on Page 2		
Impact of Change Modification of the HFFACO milestone M-91-12 to establish thermal treatment rates through CY 2005.		
Affected Documents Hanford Federal Facility Agreement and Consent Order, as amended, DOE's annual Land Disposal Restrictions Report, and Hanford site internal planning and budget documents (e.g., Agreement Action Plan, Appendix D, DOE and DOE Contractor Baseline Change Control documents; Multi Year Work Plans; Sitewide System Engineering control documents, Project Management Plans and Hanford Site integrated Priority List (IPL)).		
Approvals <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 60%;"> <p> <i>W. Wade Ballard</i> 3/22/01 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved DOE Date </p> <p> _____ Date <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved EPA </p> <p> <i>Muhl</i> 3/22/01 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved Ecology Date </p> </div> <div style="width: 35%; text-align: center; font-size: 2em; font-weight: bold; border: 1px solid black; padding: 10px;"> RECEIVED APR 04 2001 EDMC </div> </div>		

On the State level, WAC 173-303-140(4)(d) restricts the land disposal of Organic/Carbonaceous (O/C) waste. A generator is encouraged to reclaim, recycle, recover, treat, detoxify or otherwise process wastes to remove or reduce their harmful properties or characteristics. If the waste cannot be detoxified, at a minimum, wastes must be incinerated to destroy the harmful properties or characteristics. Stabilization, macro-encapsulation and solidification are not acceptable for O/C wastes to be disposed of in Washington. Hanford generates large volumes of O/C waste during routine clean up activities (personal protective equipment, wood debris, organic chemicals, etc.). WAC 173-303-140(3)(c) defines O/C waste as "a dangerous waste that contains combined concentrations of greater than ten percent O/C constituents in the waste; O/C constituents are those substances that contain carbon-hydrogen, carbon-halogen, or carbon-carbon chemical bonding".

M-91-12 states "Initiate thermal treatment of currently stored and newly generated CH LLMW. At least 600 cubic meters will be provided for treatment by December 2005".

On January 12, 2001, Ecology sent DOE a letter notifying it that DOE had failed to meet the milestone. DOE believes that the milestone was met and initiated dispute at the project manager level on January 24. Approval of this HFFACO modification constitutes settlement of this dispute by requiring this change which will drive continued thermal treatment of mixed low level waste and allow DOE an additional 24 months to achieve sustained treatment capabilities.

Milestone M-91-12 is being changed to require thermal treatment of 240 cubic meters of Hanford low level mixed waste by December 2002 and an additional 360 cubic meters, for a total of 600 cubic meters, to be thermally treated and disposed by December 2005.

Strikeout indicates text to be deleted; shading indicates text to be added.

Milestone	Description	Date
M-91-12	Initiate thermal treatment of currently stored and newly generated CH LLMW. At least 600 cubic meters will be provided for treatment by December 2005.	12/31/00

Milestone	Description	Date
M-91-12	COMPLETE THERMAL TREATMENT AND DISPOSAL OF AN ADDITIONAL 360 CUBIC METERS OF CONTACT HANDLED LLMW THIS BRINGS THE CUMULATIVE TOTAL TO AT LEAST 600 CUBIC METERS OF CONTACT HANDLED LLMW THERMALLY TREATED AND DISPOSED OF.	12/31/2005

M-91-12A

COMPLETE THERMAL TREATMENT AND DISPOSAL OF AT
LEAST 240 CUBIC METERS OF CONTACT HANDLED LLMW.

12/31/02

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