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

01-RCA-322

**JUN 07 2001**

Mr. Douglas R. Sherwood  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite Five  
Richland, Washington 99352

Mr. Michael A. Wilson, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
1315 W. Fourth Avenue  
Kennewick, Washington 99336

**RECEIVED**  
JUN 19 2001

**EDMC**

Addressees:

**NOTIFICATION THAT HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) INTERIM MILESTONE M-16-03E, COMPLETE REMEDIATION OF THE WASTE SITES IN THE 300-FF-1 OPERABLE UNIT (EXCLUDING THE 618-4 BURIAL GROUND) TO INCLUDE EXCAVATION, VERIFICATION, AND BACKFILLING, WILL NOT BE MET AS SCHEDULED**

Numerous discussions have occurred between the U.S. Department of Energy, Richland Operations Office (RL), the State of Washington Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA) on the cleanup goals for the 300 Area. From these discussions, it was agreed that the M-16-03E Milestone completion should be revised. An agreement was made between the tri-parties in the 300-FF-2 Record of Decision to address 300 Area cleanup goal issues through a bench scale study. The study tests the leach rate and contaminant-partitioning coefficient (Kd) of representative samples from the 300 Area. The purpose of the study is to confirm modeling assumptions supporting cleanup goals for the 300-FF-1 and 300-FF-2 Operable Units to ensure that the elected remediation goal for uranium (350 pCi/g) is protective of groundwater and the Columbia River. EPA determined that the backfill of Landfills 1A, 1B, 1D and the South Process Pond should be postponed until the results of the study can be obtained and evaluated.

RL intends to complete the bench scale study by July 2002. The results of the study will then be evaluated and modeling performed to confirm the assumptions supporting cleanup goals for uranium. Assuming that the evaluation results support present cleanup goals and regulator approval of closeout verification packages, backfill of the sites should be completed by September 30, 2003.

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Given the above and in accordance with Tri-Party Agreement, Article VIII, this letter serves as RL's 110-day notification that the milestone will not be met as scheduled on September 30, 2001. In addition, a Tri-Party Agreement Change Request, M-16-01-03, revising the completion date to September 30, 2003, is attached for your review and approval.

RL will continue to work collaboratively with EPA and the State of Washington Department of Ecology to finalize and proceed with this activity. Please direct any questions or concerns to Alex Teimouri, of my staff, on (509) 376-6222, or Bob McLeod, Environmental Restoration Division, on (509) 372-0096.

Sincerely,



Joel Hebdon, Director  
Regulatory Compliance and Analysis Division

RCA:AET

Attachment

cc w/attach:

J. G. April, BHI

D. N. LaRue, BHI

T. E. Logan, BHI

R. Gay, CTUIR

R. F. Stanley, Ecology

J. S. Hertz, FHI

O. S. Kramer, FHI

E. Murphy-Fitch, FHI

T. M. Martin, HAB

P. Sobotta, NPT

M. L. Blazek, Oregon Energy

R. Jim, YN

Administrative Record

Change Number <b>M-16-01-03</b>	<b>Federal Facility Agreement and Consent Order Change Control Form</b> <small>Do not use blue ink. Type or print using black ink.</small>	Date <b>June 5, 2001</b>
Originator <b>Robert G. McLeod, RL</b>		Phone <b>372-0096</b>
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title <b>Revise completion date for Tri-Party Agreement Interim Milestone M-16-03E, Complete Remediation of the Waste Sites in the 300-FF-1 Operable Unit (Excluding the 618-4 Burial Ground), to Include Excavation, Verification, and Backfilling</b>		
Description/Justification of Change This change request proposes that the submittal of Tri-Party Agreement Interim Milestone M-16-03E be extended.		
<u>Number</u> M-16-03E	<u>Milestone</u> Complete Remediation of the Waste Sites in the 300-FF-1 Operable Unit (Excluding the 618-4 Burial Ground), to Include Excavation, Verification, and Backfilling	<u>Due Date</u> <del>September 30, 2001</del> September 30, 2003
Agreement was reached between RL, Ecology and EPA that the M-16-03E milestone completion should be revised. An agreement was made between the Tri-Parties in the 300-FF-2 Record of Decision (ROD) to address 300 Area cleanup goal issues through a bench scale study. The study tests the leach rate and contaminant-partitioning coefficient (Kd) of representative samples from the 300 Area. The purpose of the study is to confirm modeling assumptions supporting cleanup goals for the 300-FF-1 and 300-FF-2 operable units to ensure that the elected remediation goal for uranium (350 pCi/g) is protective of groundwater and the Columbia River. The EPA determined that the backfill of Landfills 1A, 1B, 1D and the South Process Pond should be postponed until the results the study can be obtained and evaluated.		
RL intends to complete the bench scale study by July 2002. The results of the study will then be evaluated and modeling performed to confirm the assumptions supporting clean up goals for uranium. Assuming that the evaluation results support present cleanup goals and regulator approval of closeout verification packages, backfill of the sites should be completed by September 30, 2003.		
Impact of Change This change does not impact cleanup of contamination at 300-FF-1. Excavation of contaminated soil and debris to meet the criteria specified in the CERCLA Record of Decision (ROD) has already been completed at the waste sites associated with this milestone. Deferral of site restoration (backfill and regrading) will allow time for the Tri-Parties to confirm the cleanup criteria is appropriate, prior to performing any irreversible activities.		
Affected Documents 1) Hanford Federal Facility Agreement and Consent Order Action Plan Appendix D. Major and Interim Milestones 2) Remedial Design Report/Remedial Action Work Plan for the 300-FF-1 Operable Unit (DOE/RL-96-70)		
Approvals <u>W. W. Ballard</u> W. W. Ballard, DOE IAMIT Representative	<u>6/7/01</u> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
_____ D. R. Sherwood, EPA IAMIT Representative	_____ Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
_____ M. A. Wilson, Ecology IAMIT Representative Ecology	_____ Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved