Change Number M-37-25-02	Federal Facility Agreement and Consent Order Change Control Form	Date 07/31/2025

Originator
Jason Capron, DOE-HFO

Phone
509-373-9626

Class of Change
[ ] I – Signatories [**X**] II – Executive Managers [ ] III – Project Managers

Change Title
Modification of M-037 Series Milestones in TPA Appendix D

Description/Justification of Change

This change control form updates the M-037 coordinated closure milestones to align with updates from adaptive milestone planning, including deletion of previously associated M-015 milestones and establishment of M-100 milestones for the adaptive milestone process. The planning for RCRA closure in coordination with associated CERCLA decision-making efforts is preserved, but no-later-than dates are being added or updated based on currently projected RCRA permitting timelines. These changes have been discussed with Ecology and EPA and the parties are aligned regarding the new dates. Therefore, DOE-HFO believes this constitutes Good Cause to extend the due dates for M-037-21, M-037-23, M-037-24, M-037-27, M-037-28 and M-037-29 (reference TPA Article XL, Good Cause for Extensions, paragraph 120.D, a delay cause, or which is likely to be caused, by the grant of an extension in regard to another timetable and deadline or schedule).

Impact of Change

This change control form adjusts TPA Interim Milestones M-037-21 through M-037-29 in the M-037 milestone series.

Affected Documents

The *Hanford Federal Facility Agreement and Consent Order* or TPA Action Plan, Appendix D, "Work Schedule Milestones and Target Dates Including Designation of Lead Regulatory Agency and Hanford Site internal planning management, and budget documents (e.g., DOE and DOE contractor Baseline Change Control documents, Project Management Plans).

Approvals

SCOTT GREEN Digitally signed by SCOTT GREEN Date: 2026.08.31 07:55:40 -07'00'
S.M. Green, DOE-HFO _____ Date _____ Approved **X** Disapproved _____

Stephanie Schleif Digitally signed by ssch461 Date: 2026.09.16 12:19:35 -07'00'
S.N. Schleif, Ecology _____ Date _____ Approved **X** Disapproved _____

N/A
L.C. Buelow, EPA _____ Date _____ Approved _____ Disapproved _____

Authorized Changes

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
M-037-20 Lead Regulatory Agency: Ecology	If requesting the use of alternative requirements for closure of the 216-A-29 Ditch, 216-A-36B Crib, 216-A-37-1 Crib, and/or 216-B-63 Trench under WAC 173-303-610(1)(e), DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4). The CC Proposal shall be submitted to Ecology ~~at the same time as~~ within 30 days of the submittal of the ~~P~~proposed ~~C~~corrective ~~A~~action ~~D~~decision and ~~/~~Proposed Plan for the 200-EA-1 OU ~~is submitted~~ to Ecology ~~pursuant to M-015-92B~~. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include the following information: 1. Justification for the use of alternative requirements as required by WAC 173-303-610(1)(e)(i)–(ii); 2. Identification of which closure requirements are proposed to be replaced with alternative requirements and description of the alternative requirements that would apply, to the extent such information is available, as required by WAC 173-303-610(3)(a)(ix); and 3. Explanation of how closure of the TSD unit(s) using the proposed alternative requirements will comply with the closure performance standard set forth in WAC 173-303-610(2)(a), as required by WAC 173-303-610(3)(a)(i). DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with the adaptive milestone process step in the M-100-02 milestone series. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	~~Submit concurrently with M-015-92B~~ Within 30 days of submitting the Proposed Plan for the 200-EA-1 OU but no later than 9/30/2034

Number	Milestone	Due Date
M-037-21 Lead Regulatory Agency: Ecology	DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: 216-A-29 Ditch, 216-A-36B Crib, 216-A-37-1 Crib, and 216-B-63 Trench. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-EA-1 OU. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix). If a CC Proposal has not been developed by the "no later than" date in this milestone due date, then a closure plan shall be due on that date. DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with the adaptive milestone process step in the M-100-02 milestone series~~DOE's every-three-years proposals pursuant to the Adaptive Milestone Approach described in IAMIT Determination 2021-002~~. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	Within 270 days of the last CAD/ROD signature for the 200-EA-1 OU but no later than ~~9/30/2034~~ 9/30/2036

Number	Milestone	Due Date
M-037-22 Lead Regulatory Agency: Ecology	If requesting the use of alternative requirements for closure of the 216-B-3 Main Pond system and/or 216-S-10 Pond and Ditch under WAC 173-303-610(1)(e), DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4). The CC Proposal shall be submitted to Ecology ~~at the same time as~~ within 30 days of the submittal of the ~~P~~proposed ~~C~~corrective ~~A~~action ~~D~~decision and ~~/~~Proposed Plan for the 200-OA-1 OU ~~is submitted~~ to Ecology ~~pursuant to M-015-38B~~. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include the following information: 1. Justification for the use of alternative requirements as required by WAC 173-303-610(1)(e)(i)–(ii); 2. Identification of which closure requirements are proposed to be replaced with alternative requirements and description of the alternative requirements that would apply, to the extent such information is available, as required by WAC 173-303-610(3)(a)(ix); and 3. Explanation of how closure of the TSD unit(s) using the proposed alternative requirements will comply with the closure performance standard set forth in WAC 173-303-610(2)(a), as required by WAC 173-303-610(3)(a)(i). DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with the adaptive milestone process step in the M-100-02 milestone series. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	~~Submit concurrently with M-015-38B~~ Within 30 days of submitting the Proposed Plan for the 200-OA-1 OU but no later than 9/30/2034

Number	Milestone	Due Date
M-037-23 Lead Regulatory Agency: Ecology	DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: 216-B-3 Main Pond system and 216-S-10 Pond and Ditch. The CC Proposal shall be submitted to Ecology within 270 days of the last ROD signature for the 200-OA-1 OU. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix). If a CC Proposal has not been developed by the "no later than" date in this milestone due date, then a closure plan shall be due on that date. DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with the adaptive milestone process step in the M-100-02 milestone series~~DOE's every-three-years proposals pursuant to the Adaptive Milestone Approach described in IAMIT Determination 2021-002~~. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	Within 270 days of the last CAD/ROD signature for the 200-OA-1 OU but no later than ~~9/30/2034~~ 9/30/2036

Number	Milestone	Due Date
M-037-24 Lead Regulatory Agency: Ecology	DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: 241-CX Tank System (CX-70, CX-71, and CX-72) and Inactive SST Components outside the WMAs. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-IS-1 OU. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix). If a CC Proposal has not been developed by the "no later than" date in this milestone due date, then a closure plan shall be due on that date. DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with the adaptive milestone process step in the M-100-02 milestone series~~DOE's every-three-years proposals pursuant to the Adaptive Milestone Approach described in IAMIT Determination 2021-002~~. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	Within 270 days of the last CAD/ROD signature for the 200-IS-1 OU but no later than ~~9/30/2034~~ 9/30/2036

Number	Milestone	Due Date
M-037-25 Lead Regulatory Agency: Ecology	If requesting the use of alternative requirements for closure of the Inactive SST Components Outside the WMAs under WAC 173-303-610(1)(e), DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4). The CC Proposal shall be submitted to Ecology ~~at the same time as~~ within 30 days of the submittal of the ~~P~~proposed ~~C~~corrective ~~A~~action ~~D~~decision and ~~/~~Proposed Plan for the 200-IS-1 OU ~~is submitted~~ to Ecology ~~pursuant to M-015-92C~~. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include the following information: 1. Justification for the use of alternative requirements as required by WAC 173-303-610(1)(e)(i)–(ii); 2. Identification of which closure requirements are proposed to be replaced with alternative requirements and description of the alternative requirements that would apply, to the extent such information is available, as required by WAC 173-303-610(3)(a)(ix); and 3. Explanation of how closure of the TSD unit(s) using the proposed alternative requirements will comply with the closure performance standard set forth in WAC 173-303-610(2)(a), as required by WAC 173-303-610(3)(a)(i). DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with the adaptive milestone process step in the M-100-02 milestone series. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	~~Submit concurrently with M-015-92C~~ Within 30 days of submitting the Proposed Plan for the 200-IS-1 OU but no later than 9/30/2034

Number	Milestone	Due Date
M-037-26 Lead Regulatory Agency: Ecology	If requesting the use of alternative requirements for closure of any of the Green Island TSD units located in the Low-Level Burial Grounds under WAC 173-303-610(1)(e), DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4). The CC Proposal shall be submitted to Ecology ~~at the same time as~~ within 30 days of the submittal of the ~~P~~proposed ~~C~~corrective ~~A~~action ~~D~~decision and ~~/~~Proposed Plan for the 200-SW-2 OU ~~is submitted~~ to Ecology ~~pursuant to M-015-93B~~. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include the following information: 1. Justification for the use of alternative requirements as required by WAC 173-303-610(1)(e)(i)–(ii); 2. Identification of which closure requirements are proposed to be replaced with alternative requirements and description of the alternative requirements that would apply, to the extent such information is available, as required by WAC 173-303-610(3)(a)(ix); and 3. Explanation of how closure of the TSD unit(s) using the proposed alternative requirements will comply with the closure performance standard set forth in WAC 173-303-610(2)(a), as required by WAC 173-303-610(3)(a)(i). DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with the adaptive milestone process step in the M-100-02 milestone series. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	~~Submit concurrently with M-015-93B~~ Within 30 days of submitting the Proposed Plan for the 200-SW-2 OU but no later than 9/30/2034

Number	Milestone	Due Date
M-037-27 Lead Regulatory Agency: Ecology	DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: Low-Level Burial Grounds Green Islands. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-SW-2 OU. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of the Green Island TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix). If a CC Proposal has not been developed by the "no later than" date in this milestone due date, then a closure plan shall be due on that date. DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with the adaptive milestone process step in the M-100-02 milestone series~~DOE's every-three-years proposals pursuant to the Adaptive Milestone Approach described in IAMIT Determination 2021-002~~. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	Within 270 days of the last CAD/ROD signature for the 200-SW-2 OU but no later than ~~9/30/2034~~ 9/30/2036

Number	Milestone	Due Date
M-037-28 Lead Regulatory Agency: Ecology	DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for all TSD Units in the 221-B Canyon Facility. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-CB-1 OU. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix). If a CC Proposal has not been developed by the "no later than" date in this milestone due date, then a closure plan shall be due on that date. DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with the adaptive milestone process step in the M-100-02 milestone series~~DOE's every-three-years proposals pursuant to the Adaptive Milestone Approach described in IAMIT Determination 2021-002~~. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	Within 270 days of the last CAD/ROD signature for the 200-CB-1 OU but no later than ~~9/30/2034~~ 9/30/2036

Number	Milestone	Due Date
M-037-29 Lead Regulatory Agency: Ecology	DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: PUREX Tunnels 1 and 2 and all TSD Units ~~in~~ at the PUREX Canyon Facility. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-CP-1 OU. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix). If a CC Proposal has not been developed by the "no later than" date in this milestone due date, then a closure plan shall be due on that date. DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with the adaptive milestone process step in the M-100-02 milestone series~~DOE's every-three-years proposals pursuant to the Adaptive Milestone Approach described in IAMIT Determination 2021-002~~. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	Within 270 days of the last CAD/ROD signature for the 200-CP-1 OU but no later than ~~9/30/2034~~ 9/30/2036