
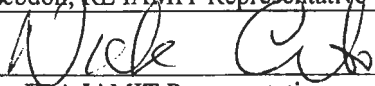



<b>Change Number</b>	<b>Federal Facility Agreement and Consent Order Change Control Form</b>		<b>Date:</b>	
M-016-04-05	Do not use blue ink. Type or print using black ink.		August 9, 2004	
<b>Originator:</b> K. M. Thompson, RL/Mike Goldstein, EPA		<b>Phone:</b> 373-0750/376-4919		
<b>Class of Change:</b>				
<input type="checkbox"/> I - Signatories		<input checked="" type="checkbox"/> II - Executive Manager		<input type="checkbox"/> III - Project Manager
<b>Change Title:</b>				
Establish Tri-Party Agreement Interim Milestones under the M-016 series milestones to address groundwater contamination in the 300-FF-5 Operable Unit				
<b>Description/Justification of Change:</b>				
<p>The attenuation of the 300-FF-5 Operable Unit uranium plume is significantly slower than the estimated attenuation rate that formed the basis for the July 1996 Record of Decision (ROD) identifying natural attenuation and continued groundwater monitoring as the remedial action. The Remedial Investigation/Feasibility Study predicted that the remedial action objectives would be achieved in 3 to 10 years (from late 1993). Source-removal actions for the primary liquid waste disposal facilities have been completed and the cleanup of remaining waste sites and burial grounds will be ongoing for the next decade. In addition, emerging issues not addressed in the 1996 ROD, such as the tritium plume at the 618-11 burial ground and the uranium plume at the 316-4 crib, need an updated Feasibility Study to support a remedy decision as well. Finally, the conceptual model for uranium transport has been enhanced significantly since the 1996 ROD was issued, providing a more reliable basis for assessing passive and active remedial alternatives. Therefore, the Tri-Parties have agreed to reevaluate the natural attenuation remedy and assess the potential for active and passive remedial measures to achieve remedial action goals identified in the July 1996 ROD – restoration of the aquifer to drinking water standards within a reasonable timeframe.</p> <p>A Focused Feasibility Study (FFS) will be completed to evaluate technical alternatives and a Draft Proposed Plan (PP) will be submitted with the recommended path forward to achieve the remedial action goals identified in the July 1996 ROD – restoration of the aquifer to drinking water standards within a site-specific reasonable timeframe. If appropriate, a Treatability Investigation Workplan will be submitted (as a primary document under the TPA) with a schedule for revising the FFS/PP, reflecting the time necessary to complete the workplan activity. If a Treatability test is required, a new milestone for delivery of an updated FFS and PP will be negotiated to accommodate the test and assessment of its results.</p> <p>The FFS/PP will be coordinated with ongoing Columbia River risk assessment activities. Additional analysis may be necessary to evaluate technologies for further reducing the flux of risk-driving contaminants to the Columbia River and its riparian habitat.</p> <p>The FFS/PP will provide data necessary to support the evaluation of technical impracticability waivers and alternate concentration limits as provided under CERCLA for portions of (or the entire) aquifer if restoration to drinking water standards within a reasonable time frame cannot be achieved.</p>				
Continued on Page 2				
<b>RECEIVED</b> AUG 19 2004				
<b>EDMC</b>				
<b>Impact of Change:</b>				
Modifies regulatory requirements governing Hanford remediation activities. Administrative action required to incorporate this change into Appendix D of the Tri-Party Agreement.				
<b>Affected Documents:</b>				
The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi-Year Work Plan; Sitewide Systems Engineering Control Documents; Project Management Plans, and, if appropriate, LDR Report requirements).				
<b>Approvals:</b>				
 J. B. Hebdon, RL IAMIT Representative		8/9/04 Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
 N. Ceto, EPA IAMIT Representative		8/10/04 Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved

The proposed change is aligned with M-016-00B major milestone, *Complete All Interim Response Actions for the 300 Areas* due September 30, 2018.

Modifications established by approval of this Tri-Party Agreement Change Request are denoted as ~~strikeout~~ for deletions and shading for additions/new text.

Milestone	Description	Date
68 M-016-671 	Submit a Draft Focused Feasibility Study (FFS)/Proposed Plan (PP) for the 300-FF-5 Operable Unit that reevaluates the natural attenuation remedy, assesses the potential for active and passive remedial measures to achieve remedial action goals identified in the July 1996 ROD – restoration of the aquifer to drinking water standards within a reasonable timeframe, provides data necessary to support the evaluation of technical impracticability waivers and alternate concentration limits as provided under CERCLA for portions of (or the entire) aquifer if restoration to drinking water standards within a reasonable time frame cannot be achieved. If appropriate, a Treatability Investigation Workplan will be submitted (as a primary document under the TPA) with a schedule for revising the Focused Feasibility Study and Proposed Plan reflecting the time necessary to complete the workplan activity. If a treatability test is required, a new milestone for delivery of an updated FFS and PP will be negotiated to accommodate the test and assessment of its results.	03/31/2005