Change Number	Federal Facility Agreement and Consent Order Change Control Form	Date		
C-05-01	Do not use blue ink. Type or print using black ink.	September 26, 2005		
Originator		Phone		
D R A F T K. D. Leary, RL/D. E. Jackson, RL 509-373-7285/509- 376-8086				
Class of Change [] I - Signatories [X] II - Executive Manager [] III - Project Manager				
Change Title Remove Double Asterisk (indicating a TSD unit) for the 216-U-12 Crib in Appendix C of the Tri-Party Agreement.				
Description/Justification of Change				
Appendix C of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) lists Hanford waste sites that potentially require remediation. When the U.S. Department of Energy (RL), the U.S. Environmental Protection Agency (EPA) and the State of Washington, Department of Ecology (Ecology), hereinafter referred to as the Parties, first negotiated the Hanford Site cleanup program, the waste sites were divided into operable units (OU). OU groupings were based on the likely response scenarios including both sampling and analysis and remedial action. OU groupings were revised as the likely response scenarios changed. Each OU (and the waste sites contained therein) was defined as a Resource Conservation and Recovery Act (RCRA) Past Practice Site (RPP) or a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Past Practice Site (CPP) based primarily on the presence or absence of RCRA treatment, storage, or disposal facilities within the OU. Description/Justification continued on page 2.				
Impact of Change				
Changes to Appendix C; no impact to Tri-Party Agreement milestones or schedule.				
Affected Documents				
The Hanford Federal Facility Agreement and Consent Order, as amended, Hanford Facility Part A Permit Application, Groundwater Monitoring Plan for the 216-U-12 Crib, Waste Information Data System for 216- U-12 Crib, the 200-UW-1 Record of Decision 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).				
Approvals				
	<u>-</u>			
DOE	ApprovedDisapprovedDisapproved	Page 1 of 2		
EPA	ApprovedDisapproved	1 age 1 01 2		
	Approved Disapproved			
Ecology	Date			

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DRAFT

Description/Justification Continued

Appendix B of the Tri-Party Agreement contains the listing of Treatment, Storage, or Disposal (TSD) groups/units. Historical records were assembled and an interview conducted with a process engineer located in the UO₃ building during 1987. The interview and the records (engineering log books, operations log books, official correspondence, a plant operating procedure, a temporary work procedure, and a work plan) demonstrate that hazardous waste was not discharged to the 216-U-12 crib after July 27, 1987. The agreed upon date between Ecology and DOE when the mixed waste rule applies is August 19, 1987. Therefore, the 216-U-12 Crib is reclassified as a RCRA Past Practice site and not a Treatment, Storage or Disposal (TSD) site. The double asterisks, indicating a TSD site, are removed from the 216-U-12 Crib in Appendix C by this change request.

Modifications to Tri-Party Agreement Appendix C.

Modifications to Tri-Party Agreement Appendix C are denoted using strikeout for text deletions.

Appendix C

Listing by Operable Unit.

OPERABLE UNIT Waste Unit Name	LEAD REGULATORY AGENCY Waste Unit Aliases	Unit Type	Status
200-UW-1	Ecology	RPP	
216-U-12 <u>**</u>	216-U-12, 216-U-12 Crib	Crib	

Note: The strike through appearing below the double asterisk is indicating the deletion of the double asterisk.

Appendix C footnotes (displayed for information)

- * Active waste management units where a hazardous substance has been potentially released or a substantial threat of a release of a hazardous substance exists.
- ** Treatment Storage and Disposal (TSD) units where closure and permitting activities are to be coordinated with past practice investigation and remediation activities.
- Interim Action Record of Decision for the 100-BC-1, 100-BC-2, 100-DR-1, 100-DR-2, 100-FR-1, 100-FR-2, 100-HR-1, 100-HR-2, 100-KR-1, 100-KR-2, 100-IU-2, 100-IU-6, and 200-CW-3
 Operable Units (1999)