Upcoming Tri-Party Agreement (TPA) and Consent Decree Milestones for Hanford Cleanup

Note: This is NOT a complete list of upcoming milestones – it focuses on major issues of concern to Oregon. This summary also does not include the exact language from the TPA.

Note: Reports/assessments/negotiations/decisions are in black text.

Cleanup/monitoring actions are in red text.

Milestones at risk or that will be missed are in purple text.

2014

Sept 30  DOE shall complete retrieval of waste from all C Farm tanks (Consent Decree). DOE notified Washington and Oregon on September 22, 2014 that this milestone would be missed.

Sept 30  DOE will begin sludge retrieval from the K-West Storage basin (M-016-175). DOE made formal notification on June 12, 2014 that milestone will be missed due to Congressional funding levels and impacts of sequestration. DOE followed up in writing on September 30, 2014 and said it would be unable to propose a new date for the milestone due to budget uncertainty now and in the future. DOE recommended milestone be changed to “TBD.” EPA disapproved that request in writing on October 14, 2014 and indicated it would assess stipulated penalties beginning October 1. Matter is currently in a dispute process.

Sept 30  DOE will submit 30 per cent design for remediating the soil contamination beneath the 324 Building (M-089-06-T01). This is a TARGET, not an enforceable milestone. Submittal of 30% design occurred on September 30, 2014.
Dec 31  DOE will substantially complete construction of Low-Activity Waste Vitrification facility (Consent Decree).  *DOE notified Washington and Oregon that this milestone is in jeopardy.*

2015

Mar 31  DOE will submit a draft investigation work plan to Ecology for the 200 Area Solid Waste burial grounds, including a schedule of completion dates for major tasks (M-015-113).  ON SCHEDULE (from 200 Area Project Manager’s Meeting, November 20, 2014).

Mar 31  DOE shall complete interim response actions (cleanup under Interim Records of Decision) for 25 waste sites in the 100 D and H Areas (M-016-159).  ON SCHEDULE (from TPA Quarterly Review Meeting, December 11, 2014).

Mar 31  DOE shall submit a Facility Investigation/Corrective Measures Study cleanup alternatives work plan for the Deep Vadose Zone operable unit.  It shall identify technologies applicable for characterization, treatment and monitoring of deep vadose zone contaminants (M-015-110A).  ON SCHEDULE (from TPA Quarterly Review Meeting, December 11, 2014).

April 30  DOE and Ecology will negotiate contingency actions and milestones, if and as necessary, for providing new, compliant tanks with sufficient capacity and in sufficient time to complete retrievals under this agreement, regardless of WTP operational deficiencies (M-062-45-2).


April 30  DOE and Ecology will negotiate the date for completion of the tank waste retrievals (no later than December 31, 2040) (M-062-45-4).
<table>
<thead>
<tr>
<th>Date</th>
<th>Event Description</th>
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<tbody>
<tr>
<td>April 30</td>
<td>DOE and Ecology will negotiate the date for completion of tank waste treatment (no later than December 31, 2047) (M-062-45-5).</td>
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<tr>
<td>June 30</td>
<td>DOE will submit a Corrective Measures Study and Feasibility Study for the Central Plateau 200 East Inner Area to Ecology (M-015-92A). TO BE MISSED (from 200 Area Project Manager’s Meeting, November 20, 2014).</td>
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<tr>
<td>Sept 30</td>
<td>DOE will complete installation of extraction and injection wells for the U Plant pump-and-treat system for uranium and technetium and iodine 129 hydraulic containment (M-016-190). ON SCHEDULE (from 200 Area Project Manager’s Meeting, November 20, 2014).</td>
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<td>Sept 30</td>
<td>DOE will complete all interim 300 Area remedial actions, including confirmatory sampling (except for 618-10 and 618-11 burial grounds) (M-016-69). AT RISK (from TPA Quarterly Review Meeting, December 11, 2014).</td>
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<tr>
<td>Sept 30</td>
<td>DOE will complete demolition of all 300 Area surplus facilities (M-094-10). ON SCHEDULE (from TPA Quarterly Review Meeting, September 18, 2014).</td>
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<td>Sept 30</td>
<td>DOE will submit a Proposed Plan and other documentation for the Deep Vadose Zone operable unit (M-015-110B). TO BE MISSED (from TPA Quarterly Milestone Review Meeting, December 11, 2014).</td>
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<tr>
<td>Sept 30</td>
<td>DOE will submit a Remedial Action Work Plan for the 200 PW-1, -3, -6 waste sites (M-016-125).</td>
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</table>
Dec 31  DOE will complete sludge removal from the K-West Fuel Storage basin (M-016-176). AT RISK. In a September 30, 2014 letter to EPA, DOE indicates a delay to this milestone until sometime between March 2020 and September 2020.

Dec 31  DOE will initiate deactivation of the K-West Fuel Storage Basin (M-016-178). AT RISK, according to December 100K Area Unit Manager’s Meeting.

Dec 31  DOE shall complete the construction of all groundwater monitoring wells listed for calendar year 2015 and before (M-024-66).

Dec 31  DOE will have a remedy in place in the 300 Area designed to meet Federal Drinking Water Standards for uranium (unless otherwise specified in a CERCLA decision document) (M-016-110-T05). This is a TARGET, not an enforceable milestone. This milestone will not be met and DOE will get relief, based on comments at September 2014 Oregon Hanford Cleanup Board meeting.

Dec 31  DOE will complete interim response actions (cleanup under Interim Records of Decision) for most of the 100 K Area (M-016-143). AT RISK, according to December 100K Area Unit Manager’s Meeting.

Dec 31  DOE will submit Feasibility Study Reports and Proposed Plans for the 200 West Inner Area to EPA (M-015-92B). TO BE MISSED (from 200 Area Project Manager’s Meeting, November 20, 2014).

2016

Feb 28  DOE will complete two years of groundwater and aquifer tube sampling with the expanded monitoring network in the 100 BC Area (M-015-78).
March 30  DOE will initiate startup operations for the U Plant area pump-and-treat system for uranium and technetium 99, and iodine 129 hydraulic containment (M-016-191).  ON SCHEDULE (from 200 Area Project Manager’s Meeting, November 20, 2014).

March 31  DOE will complete interim response actions (cleanup under Interim Records of Decision) for 29 remaining waste sites in the 100 D and H Areas (M-016-161).

June 30  DOE will submit to Ecology a closure plan to address highly radioactive contamination beneath the 324 Building (M-089-06).

Sept 30  DOE will complete Plutonium Finishing Plant to “slab on grade” (M-83-00A).  AT RISK (from TPA Quarterly Review Meeting, December 11, 2014).

Sept 30  DOE will complete retrieval of non-caisson remote-handled retrievably stored waste (M-091-41A).

Sept 30  DOE will complete the conceptual design and submit a milestone change package for acquisition of capabilities or new facilities, or modification of existing facilities, for dealing with all transuranic waste in large containers (in both above-ground storage and retrievable storage).  This includes remote-handled waste (M-091-01A).

Oct 31  DOE will construct interim surface barrier number three in a tank farm location to be determined (M-045-92)

Nov 30  DOE will submit CERCLA documentation justifying whether additional cleanup/remediation work is necessary to protect groundwater in the 100 B Area (M-015-79).
Dec 31  DOE shall take actions necessary to contain the strontium 90 groundwater plume at the 100 N Area, such that the default ambient water quality standard for strontium 90 is achieved in the hyporheic zone (where the groundwater meets the river) and in the river itself (M-016-110-T03). This is a TARGET, not an enforceable milestone.

Dec 31  DOE shall implement remedial actions in all 100 Areas so that no contamination above drinking water standards or ambient water quality standards enters the Columbia River (unless otherwise specified in a CERCLA decision) (M-016-110-T04). This is a TARGET, not an enforceable milestone.

Dec 31  DOE will submit remedial investigation/feasibility study report and proposed plan for the 200 Area solid waste burial grounds (M-015-93B). AT RISK (from 200 Area Project Manager’s Meeting, November 20, 2014).

Dec 31  DOE will complete the remedial investigation/feasibility study process for all non-tank farm operable unit (excluding canyons as well) (M-015-00). AT RISK (from 200 Area Project Manager’s Meeting, November 20, 2014).

2017

March 31  DOE will complete all response actions for the 100 Areas (except groundwater actions) (M-016-00A).

June 30  DOE will determine disposition path and establish interim milestones for Hanford cesium and strontium capsules (M-092-05).

Sept 30  DOE will complete the remedial design investigation of the southeast chromium plume, including installation of new wells and evaluation of groundwater monitoring data (M-016-193). ON SCHEDULE (from 200 Area Project Manager’s Meeting, November 20, 2014).

Oct 31  DOE will construct interim surface barrier number four in a tank farm location to be determined (M-045-92).

Dec 31  DOE will substantially complete construction of the Pre-Treatment facility *(Consent Decree)*. DOE notified Oregon and Washington that this milestone is at serious risk.

Some selected “key” later deadlines

**Apr 30, 2018**  DOE will start construction of supplemental vitrification treatment facility and/or WTP enhancements (M-062-32-T01). This is a TARGET, not an enforceable milestone. ON SCHEDULE (from December ORP TPA Monthly Summary Report).

**June 30, 2018**  DOE will start HLW Facility Cold Commissioning *(Consent Decree)*. DOE notified Oregon and Washington that this milestone is at serious risk.

**Dec 31, 2018**  DOE will start LAW Facility Cold Commissioning *(Consent Decree)*. DOE notified Oregon and Washington on October 8, 2013, that this milestone is at serious risk.

**June 30, 2019**  DOE will complete the closure of Waste Management Area C (C Tank Farm) (M-045-83).
Dec 31, 2019  DOE will complete LAW Facility Hot Commissioning *(Consent Decree).* DOE notified Oregon and Washington on October 8, 2013, that this milestone is at serious risk.

Dec 31, 2019  DOE will complete HLW Facility Hot Commissioning *(Consent Decree).* DOE notified Oregon and Washington that this milestone is at serious risk.

Dec 31, 2019  DOE shall achieve hot start of waste treatment plant *(Consent Decree).* DOE notified Oregon and Washington that this milestone is at serious risk.

Dec 31, 2020  DOE will have a remedy in place to contain existing groundwater plumes (except iodine, nitrate, and tritium) in the 200 Area (M-016-119-T01). This is a TARGET, not an enforceable milestone. ON SCHEDULE (from 200 Area Project Manager’s Meeting, November 20, 2014).

Dec 31, 2020  DOE will complete all response actions in the 100 K Area (M-016-00C). AT RISK (from TPA Milestone Quarterly meeting, December 11, 2014).


April 30, 2022  DOE will complete construction of supplemental vitrification treatment facility and/or WTP enhancements (M-062-33-T01). This is a TARGET, not an enforceable milestone.

Sept 30, 2022  DOE will complete retrieval of tank wastes from an additional nine single-shell tanks *(Consent Decree).*

Dec 30, 2022  DOE will complete hot commissioning of supplemental vitrification treatment facility and/or WTP enhancements (M-062-34-T01). This is a TARGET, not an
enforceable milestone. ON SCHEDULE (from December ORP TPA Monthly Summary Report).

Dec 31, 2022  DOE shall achieve initial plant operations of the waste treatment plant (Consent Decree). DOE notified Oregon and Washington that this milestone is at serious risk.

Sept 30, 2024  DOE shall complete remedial actions for all non-tank farms and non-canyon Operable Units (M-16-00). AT RISK (from 200 Area Project Manager’s Meeting, November 20, 2014).

Dec 31, 2040  DOE will complete waste retrieval from all remaining single-shell tanks (M-045-70).

Jan 31, 2043  DOE will complete closure of all single-shell tank farms (M-045-00).

Dec 31, 2047  DOE will complete pretreatment, processing, and vitrification of all high-level and low-activity tank wastes (M-062-00).