

# Ecology perspective on TPA milestone changes

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# The Adaptive Milestone Approach

- The agencies are not seeking comment on the “Adaptive Milestone Approach”
  - The Adaptive Milestone Approach has not been proposed as a change to the TPA Legal Agreement nor the TPA Action Plan
- 14 existing milestones were suspended by the agencies to allow U.S. Department of Energy (USD OE) time to develop computer tools, which USD OE will use to re-evaluate its schedule
  - The agencies are currently not seeking comment on the suspension

# Why does Ecology support a USDOE pilot test of the Adaptive Milestone Approach?



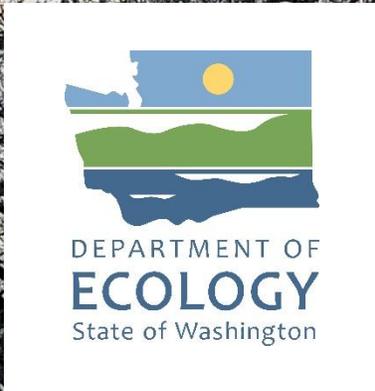
- The TPA agencies approved changes to multiple milestones in 2016
  - Those changes were based on a budget of \$1 billion per year; Congress appropriated less than that amount every year since
  - DOE has missed or will miss most of the changed milestones
- Ecology and EPA agreed to let USDOE try (pilot) a different approach
  - The draft milestones included in this comment period require USDOE to submit, by 6/30/2024, new dates for the 14 suspended milestones
  - USDOE will propose those new dates based on its computer application

# What can the public comment on?

- USDOE asked Ecology and EPA to negotiate new TPA milestones for the period 10/1/2021 – 9/30/2024 (FFYs 22 – 24)
  - These milestones are work that can be completed in the interim period until USDOE finishes developing and applying its evaluation tools.
  - These milestones aren't based on the evaluation tools.
- When (6/30/2024) USDOE proposes new dates for the 14 suspended milestones
  - There will be a future public comment period on the proposed new dates.

# Ecology perspective, draft milestones

- Positives about the FY22-24 draft milestones
  - In 2024, USD0E will propose cleanup of 200 Area small, shallow waste sites.
  - In 2026 USD0E will submit a treatability test report for technologies to cleanup some of the challenging waste sites in the Deep Vadose Zone.
    - These technologies could apply to contaminated soil around single shell tanks in addition to liquid waste disposal sites.
- Challenges
  - New dates will be proposed for the 14 suspended milestones by 06/30/2024.
  - Those milestones were established based on a \$1 B/yr budget.



# Thank you

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