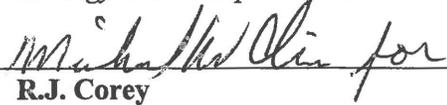
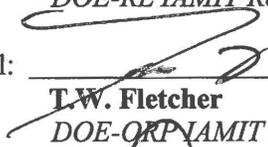


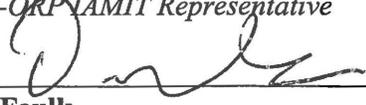
**Inter-Agency Management Integration Team (IAMIT)  
Meeting Minutes  
September 15, 2016**

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Approval:  Date: 11/9/16  
**A.K. Smith**  
*Ecology IAMIT Representative*

Approval:  Date: 10/20/2016  
**R.J. Corey**  
*DOE-RL IAMIT Representative*

Approval:  Date: 10/27/16  
**T.W. Fletcher**  
*DOE-ORP IAMIT Representative*

Approval:  Date: 10/17/16  
**D.A. Faulk**  
*EPA IAMIT Representative*

Minutes Prepared by:  Date: 10/17/16  
**M.J. Turner**  
*Mission Support Alliance*

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Bohnee, G.	NPT	Lobos, R.A.	EPA
Borghese, J.V.	CHPRC	Lynch, J.J.	ORP
Boyd, A.	Ecology	Menard, N.M.	Ecology
Brown, M.J.	Ecology	Niles, K.	ODE
Call, P.K.	RL	Peschong, J.C.	RL
Cameron, C.E.	EPA	Piippo, R.E.	MSA
Charboneau, B.L.	ORP	Price, J.B.	Ecology
Charboneau, S.L.	RL	Quintero, R.A.	RL
Cimon, S.	ODE	Singleton, D.	Ecology
Cline, M.W.	RL	Skinnarland, E.R.	Ecology
Collins, M.S.	RL	Teimouri, A.E.	HQ
Donnelly, J.W.	WRPS	Teynor, T.K.	RL
Eberlein, E.	Ecology	Turner, M.J.	MSA
Einan, D.R.	EPA	Voogd, M.J.	RL
Faulk, D.A.	EPA	Weil, S.R.	RL
Fletcher, T.W.	ORP	Whalen, C.L.	Ecology
French, M.S.	RL	Welsch, K. R.	Ecology
Gent, P.	Ecology	B.D. Williamson	RL
Harris, S.	CTUIR	B.W. Vannah	RL
Hildebrand, D.R.	DOE	Zelen, B. J.	RL
Hedges, J.A.	Ecology	Administrative Record	
Huffman, L.A.	ORP		
Henry, D.	ODE		
Jim, R.	Yakama		
Knox, K.	KCR		

**Inter-Agency Management Integration Team (IAMIT)  
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**1) Topic: Review IAMIT Decision Table**

The IAMIT action table was discussed as follows (see handout):

**Action No. 1** - DOE-RL stated that the dispute has been extended to November 1, 2016, and it is part of the Class 1 *Resource Conservation and Recovery Act (RCRA)/Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)* issue that is being discussed. This action remains open.

**Action No. 2** - DOE-RL noted that this action is associated with action No. 1, and the dispute has been extended to November 1, 2016. This action remains open.

**Action No. 3** - ORP stated that the dates in the action tracking table are correct. Ecology stated that this action was closed out and a form will be sent to the Administrative Record (AR). ORP stated that the form is routing through signature and ORP just signed the form. This action was closed.

**Action No. 4** - Ecology noted that this dispute was extended to September 30, 2016, and Ecology is reviewing the change control form. Ecology received comments from EPA (RCRA), which have been incorporated into the change control form. An Ecology internal review of the updated change control form has been done, and the change control form will be sent to EPA for review. This action remains open.

**Action No. 5** - Ecology noted that this action is related to action No. 3, and it was closed.

**Action No. 6** - Ecology stated that this action is also related to action No. 3, and it has been closed.

**Action No. 7** - DOE-RL is evaluating Ecology's comments on the draft TPA change control form C-12-03 to update the 100 Area waste sites. DOE-RL stated that Ecology provided comments on Appendix J, and the comments included some questions regarding the building name updates. DOE-RL stated that it will be following up to determine whether the building name updates could be consistent with the Tri-Party Agreement, the action memorandum, or the Caretaker II system naming conventions. DOE-RL noted that Ecology proposed updating parts of Appendix J that are related to Appendix C updates, and it will move forward with updating those parts of Appendix J and C at the same time. Ecology noted that it had two minor comments regarding Appendix C and J. DOE-RL responded that the comments were accepted and are being incorporated.

This action remains open.

**Action No. 8** - Ecology stated that MSA will tie this action into the five-year review of the TPA, and a change request has been generated. EPA inquired about its role in the action. Ecology responded that it is EPA RCRA, and the DOE-RL listings of treatment, storage and disposal units (TSDs) are being updated. Ecology indicated that DOE-RL and the contractors are in agreement with the updated listings, and the action was turned over to Ecology. Ecology stated that due to higher priority work, it suggested rolling the TSD updates into the TPA five-year review and complete all the changes at the same time. This action was closed.

**Action No. 9** - DOE-RL stated that this action, which is associated with eliminating the hard copy requirement in the AR and transitioning to electronic copies, has been caught up in the kaizen upgrade initiatives. DOE-RL stated that about \$40K was identified this year to initiate the kaizen initiatives, and the effort is under way to identify funding in FY17 to implement the top priorities from the kaizen. DOE-RL noted that the kaizen initiatives are not budgeted. DOE-RL stated its intent to not implement the entire kaizen, and expressed the goal of reaching an agreement to move forward with the electronic AR separate from the kaizen. Ecology noted that there is a TPA milestone series established for reviewing data management enhancements, and that is why Ecology proposed a milestone. Ecology stated that it requested a commitment to the kaizen from DOE-RL with a milestone, which DOE-RL objected to, and Ecology indicated that a letter commitment would be acceptable. This action remains open.

**Action No. 10** - DOE-RL stated that a project manager has been identified for the 325 TSD. This action was closed.

**Action No. 11** - EPA stated and DOE concurred that a November/December 2016 kick-off of the TPA five-year review would work well for EPA. DOE-RL suggested that discussion at the initial meeting could focus on defining the scope of the TPA updates, prioritizing the list of updates, and setting time frames for completing the updates. This action remains open.

**2) Topic: System Plan Rev. 8 Negotiations: ORP present a date at which proposals for milestones M-047-07, M-062-45 and M-090-13 due dates will be exchanged**

ORP stated that after discussion with management and the lawyers, it was determined that it would take four to six months to generate a formal proposal and complete the reviews and processes that are required before presenting the proposal. ORP noted the upcoming elections, and that changes in leadership may impact the process. ORP expressed the concern about a timely proposal, but indicated that a commitment could not be made any sooner than March 2017. Ecology stated that it would discuss internally with its management and the

lawyers regarding the March 2017 time line and then follow up with ORP.

ORP suggested further discussion regarding Ecology's position in terms of the contents of the proposal. ORP stated that there are some areas of System Plan 7 that are tied to system planning in general that lend to reaching a milestone based on the Consent Decree timing requirements. ORP added that there are other areas that seem to be better informed by the next system plan that is generated. ORP stated that in terms of the potential March 2017 time frame to submit proposals, it may be possible to reach agreement on some of the proposals fairly quickly. ORP noted that System Plan 8 will not be issued by March 2017.

Ecology referred to a meeting that was held with ORP in which time frames were discussed in terms of Direct-Feed Low-Activity Waste (DFLAW). Ecology stated that there are a number of activities that need to occur during that time frame for getting DFLAW operational, and posited that ORP is fairly definite about what those activities are and when they need to occur. Ecology added that ORP could probably wait for the system plan in terms of activities that are farther out. Ecology stated that there are seven elements in the system plan milestone, and that ORP could determine which of the seven elements related to DFLAW that it needs to make a proposal on and the elements on which a proposal could be deferred.

ORP stated that there is also an option of potentially splitting the proposal into seven proposals, which would allow some of the proposals to be done sooner. ORP noted that the legal burden remains in going through the U.S. Department of Justice (DOJ) and the DOE Office of Environmental Management/General Counsel (EM/GC), and there is a concern that would involve a two- to three-month cycle. Ecology indicated that its response and position would most likely be that the proposals do not require DOJ involvement.

Ecology requested clarification regarding the milestones that would require System Plan 8 information and other milestones that would not, and the different time frames associated with the milestones. ORP responded that if the milestones are packaged together as a single proposal, that process would take longer than if certain pieces are parsed out that don't require System Plan 8 information. ORP stated that those pieces could be done sooner, although it would still require a review cycle, and the process requires the review to go through EM/GC before negotiating any milestones. ORP added that the negotiation memorandum will have to be negotiated, which EM/GC would have to review and confirm with the DOJ that it doesn't impact the recent Consent Decree. ORP indicated that process should not take too long. Ecology requested more clarification regarding the length of time for the pieces that are not related to System Plan 8. ORP responded that the expectation is that the pieces not requiring System Plan 8 would be done sooner, but it could not be guaranteed. Ecology stated that it has a general understanding of the situation, and reiterated that its management and legal would have to be briefed.

ORP noted that preliminary System Plan 8 information will be available within the six-month window. Ecology asked if ORP will be trying to get agreements in place so that a proposal could be provided to Ecology in six months. ORP responded that the goal is to provide a proposal as soon as possible, but it has no control over the six-month time frame.

### **3) Topic: Tri-Party Agreement Five-Year Review and Update**

DOE-RL stated that this topic was discussed under action Nos. 8 and 11.

### **4) Topic: New Action Items**

Ecology initiated a discussion regarding the statement of dispute (SOD) that ORP submitted on September 12, 2016. The SOD is related to a stipulated penalty that Ecology issued to ORP for reporting on the barrier milestone M-045-92. Ecology noted that the 21-day clock started when the SOD was submitted, and it ends on October 3, 2016. If a unanimous decision is not reached by October 3, then the SOD goes to a 35-day clock, resulting in a director's determination by the director of Ecology. MSA stated that the decision has to be made if the IAMIT is going to meet to review the SOD and determine whether or not a decision will be made to elevate the SOD.

Ecology noted that the calculated penalty was \$225,000, and Ecology offered a \$10,000 settlement that was declined by ORP. Ecology stated that \$5,000 is the smallest penalty that it can offer to ORP, and encouraged ORP to accept the penalty. EPA requested clarification that ORP is disputing the fact that the violation occurred and not the \$5,000 penalty, since a penalty cannot be disputed. ORP responded that it understood the terms of a dispute. ORP added that it would have to follow up with management and would not agree to the penalty today.

Ecology stated that the action item would be to decide if the IAMIT will meet before October 3 if the parties do not reach a unanimous agreement regarding the SOD. *MSA took an action to set up an IAMIT meeting before October 3* in the event the parties do not reach a unanimous agreement regarding the SOD. There was a brief discussion regarding which IAMIT members would be required to attend, and it was agreed that DOE-RL did not need to be present, and that EPA would be invited as an optional attendee.

Ecology offered to meet with ORP to discuss some of the statements in the SOD that it considers to be factually incorrect. Ecology noted that one issue is that ORP reported the milestone on schedule after a change package was submitted for the milestone.

### **5) Topic: Other**

DOE-RL proposed a revision to the action table to improve readability. The Tri-Parties agreed to allow MSA to draft a revision of the action table.

# Interagency Management Integration Team (IAMIT)

## ACTION TRACKING

September 15, 2016

#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
1	DOE-RL provided change control forms to Ecology on 09/16/14.	Ecology provide comments on TPA Appendix Change Control form C-13-01 that aligns the waste sites for operable unit 200-IS-1.	Open	Impacts TPA milestone M-015-112 200-IS-1 work plan that is in dispute. Revised C-13-01 is under review by Ecology. On 08/18/16, Ecology reported that its staff and attorneys are preparing a white paper for the 200-IS-1 OU and the waste that was in storage before 08/1987 that remains in storage. Ecology sill share the paper with ORP and RL. RL noted that the associated dispute M-15-13-02 has been extended through 11/01/16.	ECY	
2	On 11/15/2013 DOE-RL transmits TPA change control form M-15-13-02. On 12/03/2013 Ecology disapproves. On 12/10/2013 DOE-RL initiates dispute.	Resolve dispute on Ecology disapproval of TPA change control form M-15-13-02. Milestone M-015-112, 200-IS-1 RFI work plan.	Open	Dispute extended at the Project Manager (PM) level to 03/30/2015 per extension agreement 01/29/15. Dispute extended at the PM level to 09/30/15 in accordance with agreement signed on 05/14/15. (1501370) The Parties have since agreed to extend the dispute at the PM level through 11/01/16.	Project managers resolve dispute.	

#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
3	<p>On 01/30/15 DOE-ORP delivered change control form M-62-14-02 to Ecology.</p> <p>Ecology disapproved TPA change control form M-62-14-02 on 03/12/15.</p>	<p>Resolve dispute on Ecology disapproval of TPA change control form M-62-14-02. Milestone M-062-45, Complete Negotiation's 6-Months After Last Issuance of System Plan.</p>	<p>On 08/01/16 DOE-ORP transmitted "Statement of Dispute" (letter 16-TF-0085) to the IAMIT.</p>	<p>On 05/11/15, the parties agreed to extend dispute resolution at the Project Manager (PM) level until 06/15/15. On 06/11/15 the parties agreed to extend dispute resolution at the PM level until 10/22/15. On 09/21/15, the parties agreed to extend the dispute at the PM level until 02/18/16. On 02/18/16, the parties agreed to extend the dispute at the PM level until 03/31/16. On 03/30/16, the parties agreed to extend the dispute at the PM level until 05/20/16. On 05/19/16, the parties agreed to extend the dispute at the PM level until 06/30/16. On 06/29/16, ORP and Ecology agreed to extend the dispute at the PM level until 08/01/16. On 08/01/16, ORP issued letter 16-TF-0085 for elevating Statement of Dispute to the IAMIT level.</p> <p>Per IAMIT determination number 2016-005, dated 8/22/16, M-047-07, M-090-13, M-062-45 milestone disputes were agreed to be resolved upon the start of negotiations, scheduled to begin no later than 9/8/16.</p>	<p>Project Managers resolve dispute.</p>	<p>9/8/16</p>
4	<p>On 06/30/15 DOE-ORP transmitted change control form M-45-15-03 to Ecology.</p> <p>Ecology disapproved TPA change control form M-45-15-03 on 07/14/15.</p>	<p>Resolve dispute on Ecology disapproval of TPA change control from M-45-15-03. Milestone M-045-82, "Submit complete permit modification request for Tiers 1, 2, and 3 of the single-shell tank (SST) System to support final closure requirements for Waste Management Area C (WMA-C)."</p>	<p>Open</p>	<p>On 07/16/15, DOE-ORP initiated dispute. The Parties have since agreed to extend the dispute at the PM level until 09/30/16.</p>	<p>Project Managers resolve dispute</p>	

#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
5	On 12/30/15, DOE-ORP transmitted change control form M-47-15-01 to Ecology. Ecology disapproved TPA change control form M-47-15-01 on 01/12/16	Resolve dispute on Ecology disapproval of TPA change control form M-47-15-01. Milestone M-047-07, "Submit CD-1 for the Secondary. Liquid Waste Treatment Project".	On 08/01/16 DOE-ORP transmitted "Statement of Dispute" (letter 16-TF-0084) for Milestones M-047-07 and M-090-13 to the IAMIT.	In letter 16-NWP-007, dated 01/12/16, ECY disapproved the change control form. ORP initiated dispute in letter 16-TF-0002 dated 01/19/16. The Parties agreed to extend the dispute at the PM level until 08/01/16. On 08/01/16, ORP issued letter 16-TF-0084 for elevating Statement of Dispute to the IAMIT level. Per IAMIT determination number 2016-005, dated 8/22/16, M-047-07, M-090-13, M-062-45 milestone disputes were agreed to be resolved upon the start of negotiations, scheduled to begin no later than 9/8/16.	Project Managers resolve dispute	9/8/16
6	On 12/30/15 DOE-ORP transmitted change control form M-90-15-01 to Ecology. Ecology disapproved TPA change control form M-90-15-01 on 01/12/16.	Resolve dispute on Ecology disapproval of TPA change control form M-90-15-01. Milestone M-090-13, "Submit a CD-1 for the Interim Hanford Storage Project".	On 08/01/16 DOE-ORP transmitted "Statement of Dispute" (letter 16-TF-0084) for Milestones M-047-07 and M-090-13 to the IAMIT.	In letter 16-NWP-007, dated 01/12/16, ECY disapproved the change control form. ORP initiated dispute in letter 16-TF-0002 dated 01/19/16. The Parties agreed to extend the dispute at the PM level through 08/01/16. On 08/01/16, ORP issued letter 16-TF-0084 for elevating Statement of Dispute to the IAMIT level. Per IAMIT determination number 2016-005, dated 8/22/16, M-047-07, M-090-13, M-062-45 milestone disputes were agreed to be resolved upon the start of negotiations, scheduled to begin no later than 9/8/16.	Project Managers resolve dispute	9/8/16

#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
7	12/04/2014 DOE transmits draft TPA change control form C-12-03 to update 100 Area waste sites	EPA and Ecology review and provide comments to DOE	Open	Ecology EPA comments complete, and reclassification form for 100 K reactors tentatively accepted. Appendix J draft change control form provided to the regulators. 100-N-66 WIDS description under revision by Ecology and WCH. In February, Alicia Boyd and WCH reached agreement on 100-N-66 revised description. Updated TPA Appendix C and J were distributed to regulators for EPA and Ecology in March. EPA agreement on changes received. On 05/19/16 Ecology stated they would follow up with DOE-RL on 05/20/16 regarding Appendix C. Ecology provided comments to DOE on Appendix J, then provided comments on C-12-03 on 9/1/16.	DOE	
8	On 12/29/15, DOE-RL provided an annotated change control form to Ecology for discussions with EPA on TPA Appendix B update.	Provide draft TPA simple changes Appendix B change control form to regulators.	Open	DOE-RL provided Ecology with revisions to draft Appendix B change control form (B-15-01) in September 2015. Ecology is reviewing. On 05/19/16 Ecology stated this will be reviewed once progress is made on higher priority updates and reviews. Ecology proposes to close this out during the TPA five-year review (item #11).	ECY/EPA/DOE	9/15/16

#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
9	Change control form P-09-15-01 provided to regulators	P-09-15-01, "Modifications to Hanford Federal Facility Agreement and Consent Order (HFFACO) Section 9.4, Administrative Record (AR) to eliminate hard copy requirement".	Open	Public announcement reviewed and approved by parties. Ecology has expressed interest in linking this initiative with the AR upgrade effort. On 05/19/16 Ecology reported that a draft TPA change form has been prepared and they will share with DOE-RL. On 05/25/16, Ecology provided DOE-RL with a draft TPA change control form that, if approved, would create milestones for an upgrade to the TPA Administrative Record. On 06/16/16, DOE-RL stated it was not appropriate to establish a TPA milestone to implement Kaizen upgrade initiatives. Ecology stated that an internal meeting would be held and then they would follow up with DOE-RL. Ecology later stated that they would like a letter from DOE committing to fund the AR upgrade, and would then sign the change control form.	DOE	
10	On 05/10/2015 Ecology requested discussion at 05/19/16 IAMIT meeting.	Clarifying DOE-RL TPA Project Manager (PM) role for the 325 Building treatment, storage, and disposal (TSD)	Open	Clarification/assignment needed. On 05/19/16 DOE-RL stated efforts are under way to identify PM. Jeff Bird of RL will be the new TPA PM for the 325 TSD unit; responsibility will be delegated to DOE Pacific Northwest Site Office (PNSO).	DOE	8/18/16
11	08/18/16	The Parties agreed to initiate a TPA five-year review.	Open	DOE to hold kickoff meeting to establish scope of review.	DOE	