



Inter-Agency Management Integration Team (IAMIT)
Meeting Minutes
January 8, 2015

Approval: Date: 3/3/15
J. A. Hedges
Ecology IAMIT Representative

Approval: Date: 2/11/15
R. J. Corey
DOE-RL IAMIT Representative

Approval: Date: 2/26/15
T. W. Fletcher
DOE-ORP IAMIT Representative

Approval: Date: 3/3/15
D. A. Faulk
EPA IAMIT Representative

Minutes Prepared by: Date: 2-3-15
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Brown, M. J.	Ecology	Hedges, J.A.*	Ecology	Shattuck, A. F.	MSA
Butler, D. H.	MSA	Howell, T.Q.*	WCH	Singleton, D.	Ecology
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Cimon, S.	ODE	Johnson, W.	MSA	Trimberger, B. R.	ORP
Cline M. W.*	RL	Kemp, C. J.	ORP	Turner, M.J.*	MSA
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Cusack, L.J.	CHPRC	Lobos, R.A.*	EPA	Varlsen, R.	Ecology
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Eberlein, E.	Ecology	Mattlin, E. M.	ORP	Williamson, B.D.	RL
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Faulk, D.A.*	EPA	Piippo, R.E.*	MSA	Zelen, B. J.	RL
Fletcher, T.W.*	ORP	Palomarez, A.	Ecology	Administrative Record	
French, M.S.*	DOE				
Gent, P.	Ecology				

* Attendees

Topic: IAMIT Action Tracking

The IAMIT action tracking table was provided for discussion during today's meeting (see handout). There are seven actions on the table.

Action Nos. 1 & 2: MSA stated that DOE-RL provided the change control forms for the 200-IS-1 Work Plan to Ecology on September 16, 2014, and DOE is waiting on Ecology comments. MSA noted that action No. 1 is tied to action No. 2, and that the dispute under action No. 2 was extended to January 30, 2015. Ecology stated that comments from its lawyers are not anticipated until after January 16, 2015. MSA added that the Ecology and DOE-RL project managers have indicated that an extension will be agreed to for the 200-IS-1 Work Plan dispute, and the extension date will be determined after the Project Managers Meeting (PMM) is held the week of January 12. MSA stated that a letter will be routed the week after the PMM noting the new extension date.

Action No. 3 - DOE-RL stated that at one point, the dispute regarding M-016-175 was to be forwarded to the Senior Executive Committee (SEC), and the paperwork was being drafted when EPA had suggested another approach.

EPA stated that there was no reason at this point to forward the dispute to the SEC. EPA stated that there are two issues involved with the dispute; with the first issue being whether DOE-RL had good cause to miss the milestone. EPA stated its belief that DOE-RL did not have good cause and did not adequately address good cause in the change package. DOE-RL clarified that EPA was referring to the force majeure discussion in the change package. EPA concurred, and stated that budget uncertainty was not a reason to miss the milestone. EPA reiterated that DOE-RL is accruing a penalty of \$10,000 per week for missing the milestone. DOE-RL stated that from a legal aspect, the discussion regarding force majeure needs to continue. EPA stated that clear criteria were laid out in its disapproval letter regarding why lack of funding is not an acceptable good cause for missing the milestone. EPA offered that, for example, that some of DOE-RL's receipt of \$1.6 billion in American Recovery and Reinvestment Act (ARRA) funding could have been applied to the K Basin sludge project.

EPA stated that the second issue in the dispute is associated with establishing a new schedule for sludge removal, and are willing to negotiate dates similar to what DOE-RL outlined in its Statement of Dispute. EPA added that none of the dates in the schedule could go past 2024, since it was not willing to move the major milestone date at this point.

EPA recommended extending the dispute at the IAMIT level for two reasons: 1) the President's budget for FY16 coming out in early February 2015 will provide more certain information for setting the milestones; 2) allows time for DOE-RL to address the issues outlined in EPA's initial disapproval letter regarding force majeure. DOE-RL responded that the force majeure issue is more of a legal policy issue, and that the force majeure issue will likely be elevated for discussion

within DOE management. DOE-RL added that there will be discussion with the attorneys in terms of responding to the points raised EPA's disapproval letter. EPA suggested holding one more meeting at the IAMIT level, in an effort to resolve the dispute before making the decision to send it to the SEC. It was noted that there is an SEC meeting in March 2015, although the specific date was not known.

DOE-RL expressed concern about stretching out the process with the clock ticking on fines if there was no reason to, but acknowledged that there are reasons to stretch it out, and agreed to extend the dispute to March 2015. DOE-RL noted that there is more attention from DOE-Headquarters regarding funding for the sludge project. EPA stated that the intent was to get more focus on the sludge project and that it is an issue that needs to be addressed. DOE-RL and EPA agreed to extend the dispute at the IAMIT level until March 2, 2015, (and at that time, an extension letter was signed by DOE-RL and EPA). DOE-RL indicated that there will be internal discussion regarding the force majeure issue. EPA reiterated its request that DOE-RL ensure that all of the points in EPA's disapproval letter are addressed. Ecology noted that if the dispute goes to the SEC, it will need the information that was provided to EPA.

DOE-RL raised an issue regarding the M-016-173 dispute. EPA stated that the M-016-173 dispute would be extended at the project manager level to March 2, 2015, and that a dispute package is not needed. An extension letter will be prepared and signed by DOE-RL and EPA.

Action No. 4 – MSA stated that a draft TPA Appendix C update has been provided to Ecology, and Ecology has provided comments. MSA stated that EPA has also been provided a copy for review and comment. MSA indicated that it is working through comments, and that, to date, there have been no issues raised with Appendix C. EPA stated that it should be finished with the review in the next week or two. EPA noted that in the last column in the Draft Appendix C update, there are some instances where there were no descriptions about how the waste sites were dispositioned. EPA indicated that it will be a comment, and that it will need to be addressed.

EPA stated that there is one policy issue associated with the Appendix C change form to address, that being whether the Tri-Parties should agree to move the reactors out of Appendix C. EPA stated that it would agree to move the reactors out of Appendix C, if they are moved into Appendix J. EPA stated that currently Appendix J is for the Central Plateau facilities, and Appendix J could be expanded to include the River Corridor facilities (but would have to be retitled as it only currently covers Central Plateau facilities). EPA noted that the reactors are not waste sites, per se, but there are TPA milestones in place for the reactors.

Action No. 5 - MSA stated that the update to Appendix B is associated with getting the treatment, storage and disposal (TSD) list current with the RCRA operable units. MSA noted that Ecology requested a meeting with DOE-RL and EPA to discuss updating Appendix B before the process is started. MSA stated that it has scheduled a meeting with DOE-RL to discuss Appendix B before meeting with Ecology and EPA.

Action No. 6 – DOE-RL stated that a change package has been drafted to move the due date for M-016-173 out to 2024 to align with the major milestone. DOE-RL noted that before moving forward and sending the change package to EPA, an internal review and approval process needs to be done. EPA stated that the change package for M-016-173 should be included as part of the whole package for M-016-175 so that all of the K Basin sludge milestones are signed at the same time (see discussion under action No. 3).

Action No. 7 – DOE-RL stated that it is working on the change package associated with M-016-149. EPA stated that comments were provided on the change package, and it is ready to sign the change package when DOE-RL completes its approval process. EPA stated that the change packages represent real milestone packages, and the word “proposed” was noted in the justification. EPA stated that the milestones are no longer proposed and will represent the official milestones.

IAMIT ACTION TRACKING January 8, 2015

#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
1	DOE provided change control forms to Ecology on 9/16/14	Ecology provide comments on TPA Appendix Change Control forms C-13-01 and C-14-02 that align the waste sites for operable unit 200-IS-1	Open	Stated at monthly IAMIT, impacts TPA M/S M-015-112 IS-1 work plan that is in dispute.	Ecology AG reviewing, to provide comments on legal determination due December 15	
2	11/15/2013 transmits TPA chg ctrl form 12/3/2013 Ecology disapproves 12/10/2013DOE initiates dispute	Resolve dispute on Ecology disapproval of TPA change control form M-15-13-03. Milestone M-015-112, 200-IS-1 RFI wrk pln.	Open	Dispute extended at the project managers level 11/17/14 to January 30, 2015 per extension agreement.		
3	EPA Disapproved TPA change control form M-16-14-02 on 10/14/14.	Resolve dispute on EPA disapproval of TPA change control form M-16-04-02. Milestone M-016-175 Begin Sludge Removal.	Open	SOD transmitted to the IAMIT on Dec 3, 2014.	IAMIT resolve the dispute & issue written decision or forward to the SEC.	
4	Dispute extended at the pm level 11-7-2014 to 12-3-2014.	EPA and Ecology review and provide comments to DOE	Open	Ecology comments complete, awaiting EPA comments.	EPA/ Ecology	
5	12/4/2014 DOE transmits draft TPA App C 12-12-03 chg ctrl form to update 100 Area waste sites	Meet with Ecology to review draft TPA Appendix B change control form	Open	Appendix B is out of date.	DOE schedule a meeting with Ecology to discuss.	

6	EPA "Disapproved" TPA change control form M- 16-14-04 on 12/22/14. DOE records stamped EPA received letter 12/29/2014.	Resolve dispute on EPA disapproval of TPA change control form M-16- 04-04. Milestone M-016-173, Select K Basin Sludge treatment and packaging technology and propose new interim sludge treatment and packaging milestones.	Open				
7	EPA Disapproved TPA change control form M- 16-13-04 on 12/22/14. DOE records stamped EPA received letter 12/29/2014	Resolve dispute on EPA disapproval of TPA change control form M-16- 03-04. Milestone M-016-149, Complete 100-IU-2/6 interim response actions for waste sites.	Open				

