

**Inter-Agency Management Integration Team (IAMIT)
Meeting Minutes
May 17, 2007**

Approval: *[Signature]* Date: 8/1/07
for **J. Hedges** (H0-57)
 Ecology IAMIT Representative

Approval: *[Signature]* Date: 7/26/07
M.S. McCormick (A5-11)
 DOE IAMIT Representative

Approval: *[Signature]* Date: 8/3/07
N. Ceto (B1-46)
 EPA IAMIT Representative, Chairperson

Minutes Prepared by:

[Signature] Date: 8-6-07
S.L. Moore (H8-40)
 Fluor Hanford, Inc.

Bartus, D.	EPA	H0-57	Russell, R.W.*	ORP	H6-60
Bilson, B.	FH	H8-20	Sands, J.P.*	RL	A3-04
Bohnee, G	NPT		Skinnarland, E.R.	Ecology	H0-57
Brockman, D.A.	RL	A7-50	Vance, J.G.	FH	H8-12
Cameron, C.E.	EPA	B1-46	Weis, M.J.	RL	A7-50
Ceto, N.*	EPA	B1-46	Whalen, C.L.*	Ecology	H0-57
Chalk, S.E.	RL	A7-75	Williamson, B.D.	RL	A4-52
Cimon, S.	ODE		Wolf, A.	CTUIR	
Cusack, L.	Ecology	H0-57	Administrative Record		H6-08
Engelmann, R.H.*	FH	H8-12			
French, M.S.	RL	A6-38	* Attendees		
Frey, J.A.	RL	A5-13			
Harris, S.	CTUIR				
Hedges, J.A.*	Ecology	H0-57			
Henry, D.	OOE				
Horst, L.	OOE				
Jackson, D.E.	RL	A4-52			
Jentzen, B.K.*	Ecology	H0-57			
Jim, R.	Yakama				
Mandis, M.L.	Ecology	H0-57			
Lobos, R.A.	EPA	B1-46			
Niles, K.	OOE				
Noland, T.W.*	FH	H8-12			
Piippo, R.E.*	FH	H8-12			
Price, J.B.*	Ecology	H0-57			

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Project Managers Listing

DOE provided an update on the Project Managers listing and proposed a plan for updating it as changes are constantly occurring. The IAMIT agreed that the TPA Site Integration staff would update the list as soon as a change occurs. Also, each quarter, RL will send the list to agency staff for an update review. The list is available on the TPA website.

Recording Meeting Minutes

DOE proposed that a stenographer be contracted to take the quarterly and IAMIT meeting minutes. The IAMIT members agreed.

River Corridor Completion Strategy

DOE provided a draft River Corridor Completion Strategy handout (attached) and provided a review of the strategy. The development of the strategy has been coordinated between the River Corridor and the Central Plateau Assistant Managers.

The IAMIT focused on the strategy's proposed options and EPA stated it preferred Option Four that matched the RODs as it is better to do a geographic based cleanup. Ecology stated that it makes sense to group D and H reactors and have one ROD for both. Ecology management stated that C and K areas are at risk of being pushed out and it may impact K Basin and delay the milestones. EPA stated that D and H should be combined. It was agreed that Option Four, with the change of grouping D and H together, is the strategy to take.

Ecology inquired as to how much of the strategy has been briefed with the stakeholders and that they need to be included once it is finalized. DOE took the action to update the strategy and have the team brief the Tri-Party Executive Committee during its June meeting.



Agenda
May 17, 2007

Inter-Agency Management Integration Team Meeting
Ecology Conference Room 3A, 3100 Port of Benton Blvd., Richland

Chairperson: Delmar Noyes

11:30 am to 11:50 am

Time	Topic
11:30 a.m.	Project Manager Listing Maintenance and Distribution
11:40 a.m.	Milestone Review and IAMIT Meeting Minutes
11:50 p.m.	Adjourn Inter-Agency Management Integration Team Meeting

DRAFT River Corridor Completion Strategy (4/30/07)

Introduction

- Current RCRA/CERCLA cleanup processes in the River Corridor of the Hanford Site follow the 1992 Past Practice Strategy.
- Cleanup was initiated and continues today utilizing Interim Action Records of Decision (IARODs); based on site history, process knowledge, limited site-specific waste characterization and qualitative risk assessments.
- The Past Practice Strategy provides information on how to obtain final RODs through the CERCLA process. However, a strategy is needed on what operable units to group together for the final action RODs and how to complete the regulatory process for the River Corridor.
- This strategy groups existing River Corridor operable units together for future final action RODs.
- This strategy lists the regulatory requirements (Attachment 3) and describes the process (Attachment 2) for regulatory completion of the River Corridor.

River Corridor Completion Strategy

- Continue IARODs until final RODs replace them.
- Complete Remedial Investigation/Feasibility Studies (RI/FS) for source and groundwater operable units in River Corridor. A schedule is provided in Attachment 4.
 - RIs for source and groundwater operable units may proceed in separate documents; however risks must be combined in order to support Proposed Plans (PP) and final RODs.
- Prepare PP and final RODs that combine source and groundwater operable units. Attachment 1 lists the ROD options considered and provides a brief discussion on why the above PP and ROD groupings are selected. The PP and final RODs will be grouped in the following geographic areas:
 - 100 Areas
 - 100-B/C, F, IU-2/6
 - 100-N
 - 100-K, D, H
 - 300 Areas
 - 300 Area and nearby 600 Area waste sites
- CERCLA 5 Year Reviews will ensure the final remedies selected for the River Corridor remain protective of human health and environment. Should GW plumes in the 200 change direction or migrate towards the River Corridor, it is anticipated that the River Corridor Operations & Maintenance, the 200 Area remedial processes and/or 5 Year Review process will discover and cause actions to be taken to evaluate alternative or additional remediation as necessary.
 - The 200 Area is currently gathering characterization data in the Central Plateau vadose zone to bolster their current estimates of inventory and transport. This data will support deep vadose zone treatability test and will be

used to refine the results of the modeling being conducted by the Tank/Waste Management EIS. At that point DOE will be in a position to determine if there are any future impacts from the Central Plateau and put in place a process to assess and address them.

- CERCLA documentation to date provides either interim action RODs or final action RODs that incorporate NEPA values, including cumulative risk analysis for the waste site. The Tank Closure EIS also provides cumulative risk analysis for the Hanford Site. These documents will either explain inconsistencies or be consistent between one another. The RCBRA is not the only cumulative risk analysis required but will be relied upon heavily for River Corridor final remedial decisions.
- Until final action RODs are approved, any changes to interim removal and/or remedial actions will be documented through an Explanation of Significant Differences or IAROD amendments
- The Parties will document closure following EPA guidance; e.g., *Close Out Procedures for National Priorities List Sites* EPA 540-R-98-016, OSWER Directive 9320.2-09A-PJ, and *Guidance on Completion of Corrective Action Activities at RCRA Facilities* [FRL-7454-7].
 - “Remedial action completion” is documented by Remedial Action Reports (RAR). RARs will be completed separately for source and groundwater actions. Source RARs and RCRA permit modifications, as appropriate, will be completed as source OUs are completed under Interim Action RODs and under final action RODs. Interim RARs will be completed for groundwater when final remedial actions are operational and functional.
 - Once the Remedial Action Objectives for final remedies have been met for groundwater OUs, final RARs will be completed.
 - Upon completion of River Corridor source RARs and groundwater Interim RARs, River Corridor construction completion is documented in a Preliminary Close Out Report.
 - River Corridor site completion is documented in a Final Closeout Report.
- RCRA permit modifications will be completed in parallel to the final RODs for RCRA past practice units and TSDs
 - CERCLA addresses all the substantive RCRA regulations, so by applying the CERCLA process it is anticipated that RCRA corrective actions would also be addressed.
 - Need Ecology input
 -
- The National Contingency Plan establishes the criteria that EPA will use to delete sites from the NPL at 40 CFR 300 § 425(e)(1). Per 40 CFR 300 § 425(e)(1)((i) and (iii), EPA will consider whether DOE has implemented all appropriate response actions that are required, and whether there are no releases that pose a significant threat to public health or the environment that would require further remedial measures.
 - It has not determined when deletion will be pursued.

Attachments:

1. ROD Options
2. Flow diagram on River Corridor Completion
3. Requirements, Guidance, and other criteria for RCRA/CERCLA Completion of River Corridor Project
4. Schedule

Attachment 1 River Corridor ROD

The Tri Parties desire the Proposed Plans and final action Records of Decisions (ROD) to combine source and groundwater decisions by geographic area, i.e. combining a reactor area with multiple source OUs and one groundwater OU into one ROD. This is a change from the current cleanup decisions. There are separate IARODs for source and groundwater operable units. Each IAROD has a regulatory lead by geographical area. Table 1 lists the regulatory lead assignments.

Table 1.0 Summary of Regulatory Lead Assignments

	EPA Lead	Ecology Lead
100 Area	B/C, K, & F Areas, IU-2/6	N, D, & H Areas
300 Area	300 Area	
600 Area	600 Area	

Combining OUs integrates the cleanup decision and should make it easier for interested stakeholders to understand the combined remedy for source and groundwater as well as their interrelationships. Table 2 lists potential geographic area groupings and provides considerations that should be considered for each option. The reactor areas and the 300 Area are the smallest geographic areas considered since in most cases they can be geographically separated. Groundwater plumes in some cases, close this separation.

Table 2 River Corridor Proposed Plan/ROD Options

	ROD option	Considerations
River Corridor Option 1	Combine all 100 and 300 Areas into one ROD	<p>Provides holistic River Corridor cleanup decision, institutional controls and monitoring</p> <p>Majority of source sites will have completed interim actions by 2014</p> <p>May be too much information to combine into one decision</p> <p>Multiple land uses</p> <p>Combines both EPA and Ecology sites.</p>
100 Area Option 1	B/C, K, N, D, H, F, IU-2/6	<p>Provides holistic 100 Area cleanup decision, institutional controls and monitoring</p> <p>Single land use</p> <p>Combines both EPA and Ecology sites.</p> <p>Combines multiple primary groundwater</p>

		contaminants
100 Area Option 2	B/C, F, K, IU-2/6 N D and H	Combines EPA led 100 Area and adjacent 600 Area sites N Area has unique Sr-90 groundwater plume Combines Washington Department of Ecology lead Cr groundwater sites K Area is the only area with active groundwater remediation decision
100 Area Option 3	B/C, F, IU-2/6 K, D and H N	Combines EPA lead sites with no current groundwater actions Combines Cr groundwater sites with current interim actions N Area has unique Sr-90 groundwater plume Combines EPA and Ecology lead sites
100 Area Option 4	B/C K N D H F and IU-2,6	Matches RODs with Reactor Areas Separate regulator lead for each Reactor Area Single land use for each ROD IU-2 and 6 in vicinity of F Reactor
300 Area Option 1	300 Area and adjacent 600 Area sites	Combines 300 Area interim actions Combines EPA lead sites near 300 Area Mixes land uses

Discussion and Recommendation:

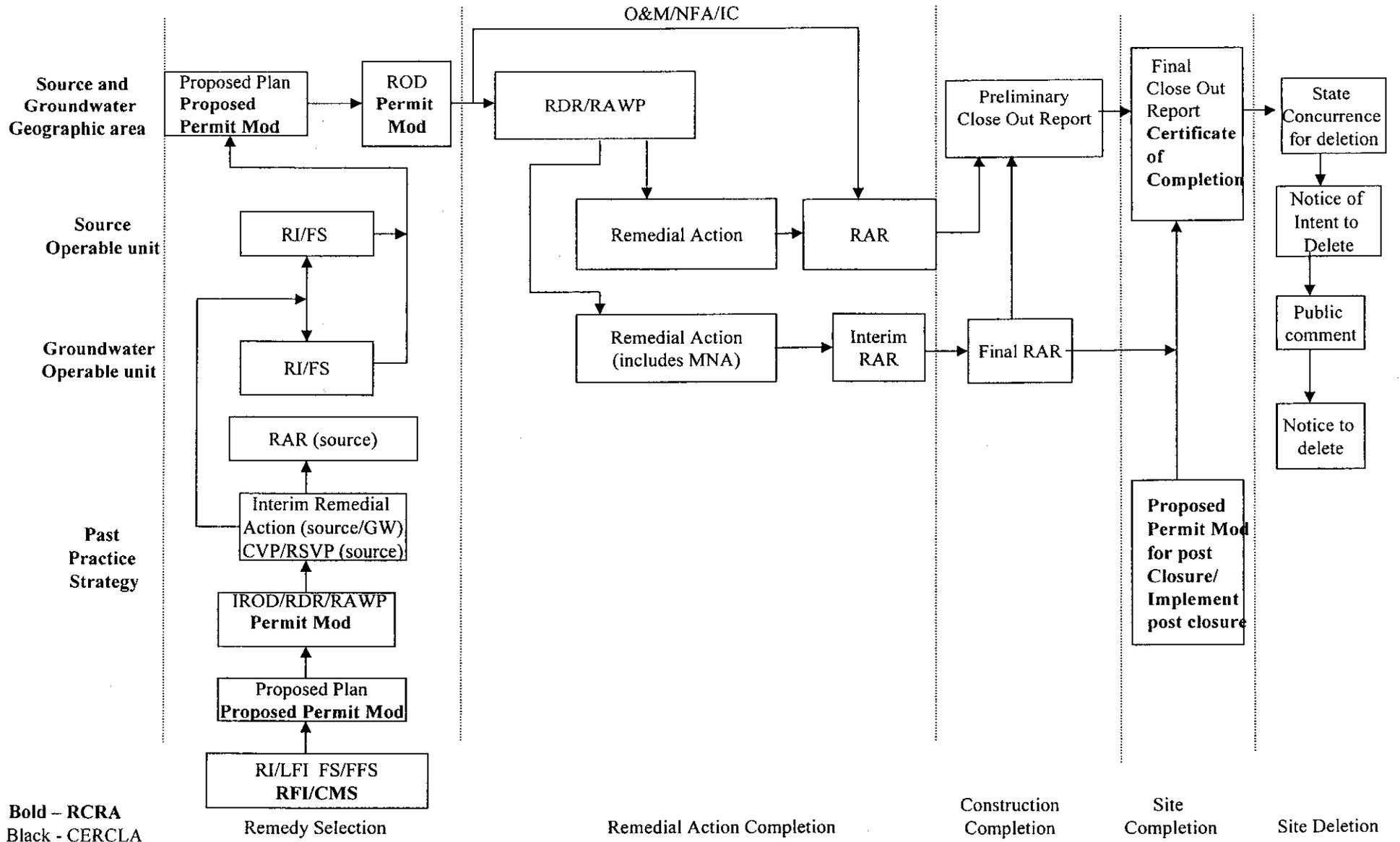
River Corridor Option 1 combines all source and groundwater operable units into one Record of Decision. This option produces the greatest benefits from a holistic point of view, however, the amount of information will be difficult to convey and understand. This option is being eliminated from consideration for this reason.

100 Area Option 1 has a similar holistic benefit, but on a slightly smaller scale. Similar to the option above, the amount of information would be difficult to convey and understand thus eliminating this option.

Both 100 Area Option 2 and 3 are broken up into manageable pieces. There are two differences in the options. 100 Area option 2 combines operable units that have the same regulatory lead. 100 Area option 3 combines sites by primary contaminant in plumes with ongoing interim actions and sites that do not have any interim actions. 100-K Area is the only reactor area that shifts between the options. Combining reactor areas with similar groundwater plumes has a greater benefit in terms of conveying information and gaining public acceptance. 100 Area Option 3 is therefore the preferred Proposed Plan and ROD grouping for the 100 Area.

The 300 Area does not need to be broken up into further pieces, therefore 300 Area option 1 is the preferred Proposed Plan and ROD grouping for the 300 Area.

River Corridor Completion Process (4/12/07DRAFT)



Attachment 3

Requirements, Guidance & Other Criteria
for
CERCLA/RCRA Completion of Hanford's River Corridor Project

CERCLA

- Requirements
 - o Comprehensive Environmental Response, Compensation & Liability Act
 - Section 104 Response Authorities
 - Section 120 Federal Facilities
 - Section 120 (h) (4) Identification of uncontaminated property
 - Section 121 Cleanup Standards
 - o NCP
 - 40 CFR 300.430 – RI/FS and selection of remedy
 - 40 CFR 300.435 – RD/RA, O&M
 - 40 CFR 300.425(e) – Delisting from the NPL -
- Guidance
 - o EPA 540-R-98-016, OSWER Directive 9320.2-09A-P, Close Out Procedures for National Priorities List Sites
 - Section 2.0 Remedial Action Completion
 - Section 3.0 Construction Completion
 - o EPA 540/F/01/009, OSWER Directive 9355.0-79FS, Superfund Post Construction Completion: An Overview
- Policy
 - o Listing and Deletion Policy for Federal Facilities [citation]

RCRA

- Requirements
 - o Hanford Permit Number WA7890008967, Section II.Y Corrective Action
 - Section II.Y.2 - Acceptance of Work Under Other Authorities and Integration with the HFFACO
 - o Dangerous Waste Regulations - WAC 173-303-610 – TSD Closure
 - o Dangerous Waste Regulations - WAC 173-303-64620 – Corrective Action Requirements
- Guidance

- Ecology/EPA Agreement on Roles and Responsibilities at NPL Sites, Applicable Requirements Under the Model Toxics Control Act Regulations (WAC 173-340)- January 13, 1995
- EPA “Guidance on the Completion of Corrective Action Activities at RCRA Facilities” [FRL-7454-7]
- EPA Policy in Federal Register 62523 24Nov1997, FRL-5925-3, “The National Priorities List for Uncontrolled Hazardous Waste Sites; Listing and Deletion Policy for Federal Facilities” Vol 62 No. 226. In particular, part IV “Policy for Deleting Sites from the NPL based Upon RCRA Deferral”

Hanford Federal Facilities Agreement and Consent Order (aka the TPA)

- Requirements
 - Part One, Article IV - Statutory Compliance and RCRA/CERCLA Integration and Coordination
 - Paragraph 17
 - Part Four, Article XXIII - RCRA/CERCLA Interface
 - Part Four, Article XXVIII – RCRA/CERCLA Reservation of Rights
 - Action Plan Section 3.5 – Waste Information Data System and Hanford Site Waste Management Units Report
 - Action Plan Section 5.2.2 – RCRA Past-Practice Unit
 - Action Plan Section 5.4 – Management of Past-Practice Units
 - Action Plan Section 7.3 – Comprehensive Environmental Response, Compensation, and Liability Act Past-Practice Unit Process
 - Section 7.3.10 - Upon satisfactory completion of the RA phase for a given operable unit, the lead regulatory agency shall issue a certificate of completion to the DOE for that operable unit. At the discretion of the lead regulatory agency, a certificate of completion may be issued for completion of a portion of the RA phase for an operable unit.
 - Action Plan Section 9.4 – Administrative Record
 - Action Plan Section 10.0 – Community Relations/Public Involvement (and Tribal Consultation)
- Guidance
 - Hanford Past-Practice Strategy (DOE/RL-91-40, Rev 0).

- Programmatic Decisions, Final Remedy Selection for the Operable Unit
- Strategy, Final Remedy Selection

Other Criteria

- HAB Advice and TPA Responses (as applicable)
- NRTC Findings (as applicable)

Attachment 4 RI/FS Schedule (TBDs, except for River Component RCBRA can be filled in late May once BCR is completed)

Activity	Start	Complete Draft
300-FF-5 - LFI/FS	2006	TBD
300-FF-5 RI/FS	TBD	TBD
100-HR-3 RI/FS	TBD	TBD
100-NR-2 RI/FS	TBD	TBD
100-FR-3 RI/FS	TBD	TBD
100-BC-5 RI/FS	TBD	TBD
100-KR-4 RI/FS	TBD	TBD
100 and 300 Source Areas RIR (includes RCBRA)	2008	2009 (Need to factor in river component)
River Component RCBRA	2005	TBD