



**Inter-Agency Management Integration Team (IAMIT)  
Meeting Minutes  
August 16, 2018**

Approval: Alexandra K. Smith  
by John B. Price  
**A.K. Smith**  
*Ecology IAMIT Representative*

Date: 9/21/2018

Approval: W.F. Hamel  
**W.F. Hamel**  
*DOE-RL IAMIT Representative*

Date: 9/18/2018

Approval: S.H. Pfaff  
**S.H. Pfaff** (for G.D. Trenchard)  
*DOE-ORP IAMIT Representative*

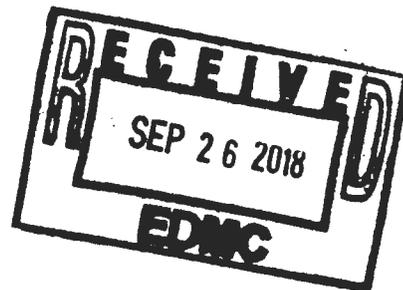
Date: 9/13/2018

Approval: R.A. Lobos  
**R.A. Lobos** (for D.R. Einan)  
*EPA IAMIT Representative*

Date: 9/24/2018

Minutes Prepared by: Michael Turner  
**M.J. Turner**  
*Mission Support Alliance*

Date: 8/30/18



**Inter-Agency Management Integration Team (IAMIT)**  
**Meeting Minutes**  
**August 16, 2018**

**1) Topic: Review IAMIT Action Tracking Table  
(See Handout)**

**Table I. Actions Items**

- A) PUREX Closure Plan, Part A – MSA stated that DOE did not appeal the PCHB decision, and the final action is for the parties to sign the March 30, 2017 meeting minutes. The minutes will be signed today, closing this action. This action is closed
- B) TPA Milestone M-045-56N “Parties Agree, at a Minimum, to Meet Yearly...” - MSA stated that this milestone has a dual lead for both ORP and Ecology to meet annually by July. ORP and Ecology were not able to meet in July, and the meeting was held last week. An IAMIT determination was made that the intent of the milestone was met, albeit two weeks later, and the parties will sign the determination at the end of today’s meeting. This action was closed.

**Table II. Status Updates**

- A) TPA Five-Year Review – MSA stated that there are a number of changes that are either pending or being worked on, and there are a few new changes that were recently introduced. MSA noted that at one point the intent was to reprint the TPA in the fall of 2018, but discussions have been tabled and the TPA will not be reprinted this fall. MSA stated that updating paragraphs 148/149 continues to be one of the bigger challenges, and that EPA’s lawyer issued comments that have not been resolved. MSA stated that it would continue to track this action. Ecology pointed out that the System Plan negotiations have been extended for 90 days beyond the August 15, 2018 date, and all the parties signed the extension. The new date for concluding negotiations is November 15, 2018. MSA added that the signed extension was submitted to the Administrative Record yesterday (8/15/18). This action remains open.
- B) Milestone M-037-10/Closure Actions for Five Specified TSDs - MSA stated that there were four draft change control forms associated with this change that affect TPA Sections 5.5 and 3.3 that Ecology provided, and they are in DOE-RL and ORP review. This action remains open.

**Table III. Recently Closed/Other Agreements**

- A) Particulate Emission Factor (PEF) for Calculating Soil Cleanup Levels for the Inhalation Pathway - A discussion was held last month regarding the PEF, and the parties agreed to close this action. This action was closed.
- B) 200-BP-5 and 200-PO-1 Interim Action Record of Decision (IROD) – The parties agreed to the IROD last month. This action was closed.

**2) Topic: New Action Items**

- A) There were no new action items.

### 3) Topic: Other

- A) Change in Format to the Quarterly Milestone Review and Monthly Project Manager Meetings (PMMs) – ORP reported that discussions were held with Ecology regarding the format for the quarterly milestone review meetings and the monthly PMMs. Agreement was reached to move the monthly PMMs to the first Thursday of the month in order to have all the reports available for discussion during the meeting. ORP noted that there have been delays with providing the Consent Decree report for the PMMs. ORP and Ecology agreed to change the quarterly format and revert to a more summary, high-level presentation. The first summary quarterly will be held in February 2019. ORP stated that after the first one or two quarterlies have been held, the format could be revised with input from Ecology. Starting in January 2019, the PMM will be held the first Thursday of the month, and there will be 12 monthly PMMs during the calendar year.

ORP stated that the format for the quarterly milestone review scheduled for November 2018 will remain the same, and it will be the last meeting before the new format is implemented in 2019.



**Inter-Agency Management Integration Team Meeting**  
**Thursday, August 16, 2018**  
Department of Ecology Building  
3100 Port of Benton Blvd.  
Richland, WA

**Agenda**

1.	Review IAMIT Action Tracking Table
2.	New Action Items
3.	Other - IAMIT Determination M-045-56 (sign)
4.	Adjourn

# Inter-Agency Management Integration Team Decision Table/Action Tracking

August 16, 2018

\*New information shown in blue

## Table I. Action Items

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### 1. PUREX Closure Plan, Pt. A

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**Reference:** DOE/RL-98-35, Rev. 3

**Affected Milestones:** N/A

**Originated:** 3/30/17

**Status:** Open

**Dispute Extended:** N/A

- Action:**
- 1) DOE-RL will send a letter to Ecology stating the agreement that the pre-closure plan will substitute for the closure plan until a closure plan template is developed. The letter will include other facilities that are operating under the same situation as PUREX - Completed 7/3/17, reference DOE-RL letter 17-AMRP-0202.
  - 2) Ecology will respond to DOE-RL's letter accepting the agreement. Completed 7/25/17, reference Ecology letter 17-NWP-090.
  - 3) Ecology provided language for closure plan "Option 2". Review in progress with DOE
  - 4) DOE-RL will develop a draft CERCLA-linked closure plan to meet Rev. 9 permit requirements.
  - 5) DOE-RL will place the revised closure plan in the operating records to replace the existing pre-closure plan.

**Comments:** PUREX Dispute closed on 3/30/2017. Meeting minutes are in review with comments left to be resolved. Ecology will not be signing meeting minutes in light of Notice of Penalty incurred on 08/31/17, but will address the issue after the appeal of the NOP on 6/19 -6/20 of 2018. On 6/26/18, the Washington State Pollution Control Hearings Board ruled in favor of the Washington State Department of Ecology on Order of Summary Judgment (PCHB No. 17-084). DOE did not appeal this decision.

**Closed:**

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### 2. TPA Milestone M-045-56N "Parties Agree, at a Minimum, to Meet Yearly..."

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**Reference:** N/A

**Affected Milestones:** M-045-56N

**Originated:** 8/16/18

**Status:** Open

**Dispute Extended:** N/A

**Action:** Sign IAMIT Determination

**Comments:** The Parties are agreeing that the intent of TPA Milestone M-045-56N was met by having an August 9, 2018 meeting, though the text of the milestone reads: "Ecology and DOE agree, at a minimum, to meet yearly (**by July** or as needed to support annual

# Inter-Agency Management Integration Team Decision Table/Action Tracking

## August 16, 2018

budgeting) for the specific purpose of assessing the adequacy of information, and the need for the establishment of additional Agreement interim measures.”

**Closed:** 07/19/18

### Table II. Status Updates

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#### 1. TPA Five-Year Review – Status

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**Reference:** TPA Article XXXVIII  
**Affected Milestones:** N/A  
**Originated:** N/A  
**Status:** Agency Review – closed (via IAMIT Determination )/TPA update – complete  
**Dispute Extended:** N/A  
**Action:** Parties will meet for close-out meeting and commit to meet regularly (or semi-regularly) on remaining agreed-upon sections targeted for updating (\*see below).  
**Comments:** Ten TPA Class II Change Control Forms were signed at the August 17, 2017 IAMIT meeting. One Class I Change Control Form was signed at the ECY Director and EPA Regional Administrator level. One Class I Change Control Form was disapproved by EPA.  
\*Some of the TPA Change Forms initially proposed as part of the TPA update (Paragraphs 148/149, Appendices H and I, and Section 11.8) will not be implemented due to time and available resources. However, the parties have agreed to continue talks on these areas.  
**Notes:** The TPA agencies have determined the changes to the TPA were “not significant” and thereby not subject to public comment. A reprint decision of the TPA has been postponed to late Fall pending changes to the above-mentioned sections of the TPA meeting agreement by the parties.  
The Parties have committed to continuing talks on other potential changes to the TPA, notably Appendices H, I, Section 11.8 and Paragraphs 148/149. Pending the outcome of these potential changes, a decision to re-print the TPA will be made. As of December 14, 2017 IAMIT, no change in the status, however it was determined that both Ecology and EPA Legal should be involved in the 148/149 discussions and that potential changes to TPA Appendices H and I may be included in the scope of the “System Plan” negotiations, which resumed January 17, 2018. System Plan Negotiations, originally scheduled to conclude by April 30, 2018, have been extended to August 15, 2018. NOTE: IAMIT meeting is one day after the negotiations due date. Action Tracking Table will be updated by then to reflect current status.

**Closed:**

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#### 2. Milestone M-037-10/Closure Actions for Five Specified TSDs

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**Reference:** TPA Milestone M-37-10: *Complete Unit-Specific Closure Requirements according to the closure plan(s) for six (6) TSD Units: 207-A South Retention Basin, 216-A-29 Ditch, 216-A-36B Crib, 216-A-37-1 Crib, 216-B- 63 Trench, and Hexone Storage and Treatment Facility (276-S-141/142).*  
**Affected Milestones:** M-037-10 (Due 9/30/2020); TPA Action Plan, Section 5.5  
**Originated:** 1/18/18  
**Status:** Open

# Inter-Agency Management Integration Team Decision Table/Action Tracking

## August 16, 2018

**Dispute Extended:** N/A

**Action:** Parties are being asked to agree that TSD closures will be coordinated with the OUs, then determine best way to adjust the milestone. Milestone to be statused at the next RL TPA Quarterly Milestone Review Meeting on September 20, 2018

**Comments:** Via RCRA Permit Rev. 9 discussions, agencies have agreed that closure of land-based TSDs can be coordinated with surrounding OUs. Should Milestone and TPA Section 5.5 be altered, potential exists for TPA negotiations, tentative agreement and/or public comment.

**Closed:**

### Table III. Recently Closed/Other Agreements

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#### 1. Particulate Emission Factor for Calculating Soil Cleanup Levels for the Inhalation Pathway

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**Reference:**

**Affected Milestones:** N/A

**Originated:** 3/15/18

**Status:** Open

**Dispute Extended:** N/A

**Action:** The IAMIT is being asked to make a decision about whether it should come before the IAMIT to make a determination regarding the future use of the Particulate Emission Factor (PEF) method and value to calculate soil cleanup levels

**Comments:** Since 2015, DOE and Ecology have debated the use of the PEF to calculate soil cleanup levels. This on-going debate impacts multiple projects, including the RCRA Permit, Rev. 9 process; and the 200-EA-1 RI/FS and RFI/CMS work plan.

**Closed:** 07/19/18

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#### 2. 200-BP-5 and 200-PO-1 Interim Action Record of Decision (Irod)

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**Reference:** DOE/RL-98-35, Rev. 3

**Affected Milestones:** N/A

**Originated:** 5/10/18

**Status:** Open

**Dispute Extended:** N/A

**Action:** Sign IAMIT Determination

**Comments:** Considering that the source investigations are not complete, the Parties are agreeing that the necessary information is not available to prepare a Feasibility Study to support a final (non-interim) ROD for the groundwater OUs. So the Parties are pursuing an Irod for the groundwater OUs to expedite the remediation of some groundwater contaminant plumes and coordinate with actions at C Farm. The Parties agree that a final (non-interim) ROD for the 200 East Area groundwater OUs will be developed after contaminant sources are adequately characterized.

**Closed:** 07/19/18



*TPA Interagency Management Integration Team Meeting  
August 16, 2018*

<u>Name</u>	<u>Organization</u>
ROD LOBOS	EPA
Kathy Kay	Court reporter
Joe Hume	AMRP
Bryan Trimmerger	ORP
Cheryl Whalen	Ecology
Scott Davis	MSIA - TPA
Stephanie Brasher	MSA-TPA
Steve Pfaff	ORP
Sara Austin	CHPRC
Chris Kemp	DOE-ORP
Jon Skinnadel	ECY
Alvo Smith	Ecology.

