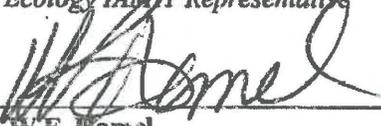




**Inter-Agency Management Integration Team (IAMIT)  
Meeting Minutes  
January 31, 2019**

Approval:   
A.K. Smith  
Ecology IAMIT Representative

Date: 3/19/19

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

Date: 2/27/19

Approval:   
R.G. Hastings  
DOE-ORP IAMIT Representative

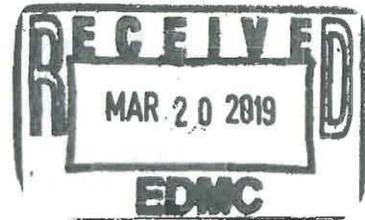
Date: 2/24/19

Approval:   
D.C. Einsa  
EPA IAMIT Representative

Date: 7 Mar 19

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

Date: 2/14/19



**Inter-Agency Management Integration Team (IAMIT)**  
**Meeting Minutes**  
**January 31, 2019**

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

**Table I. Actions Items**

- A) IAMIT Decision/Determination 2018-010: Agreement on the Pipeline Segmentation Approach - MSA stated that this IAMIT determination had been agreed to and was ready to present for signature today. It was noted that change control form C-17-07 and the tentative agreement (TA) are included with the IAMIT determination. This action will be closed.

**Table II. Status Updates**

- A) TPA Five-Year Review – MSA stated that the Tri-Party agencies have been working on paragraphs 148/149, which is a topic for discussion on today’s agenda. MSA noted that at the last IAMIT, Ecology stated they have been in discussions with ORP regarding a minor change to Appendix I. Ecology stated that there are no other updates to report today. This action remains open.
- B) Milestone M-037-10/Closure Actions for Five Specified TSDs, aka “Coordinated Closure” MSA stated that there were no updates on this action as of the last IAMIT. DOE-RL concurred that there were no updates to report. This action remains open.
- C) Modifications to TPA Section 9.4, “Administrative Record,” to Eliminate Hard Copy Requirements – MSA stated that Ecology indicated it would be willing to sign a change control form when the Administrative Record (AR) upgrade is complete. MSA noted that the AR upgrade has not been completed, but it is close to being completed. This action remains open.
- D) Agreement in Principle for the Negotiation of HHFACO Revisions in Response to Federal Fiscal Year (FFY) 2018 Appropriation and FFY 2019 President’s Budget – MSA stated that this action is associated with starting negotiations on TPA revisions for milestone series M-015, M-016 and M-085. Ecology stated that due to the recent government shutdown and EPA being on furlough, discussions will need to be restarted. MSA noted that there may be other items that were impacted by the shutdown. This action remains open.

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

- A) Administrative Update to TPA Appendix C to Align with WIDS – MSA stated that change control form C-18-02 was approved to align Appendix C with WIDS. This action was closed and will be removed from the action tracking table.

- B) IAMIT Decision/Determination 2018-012: 100/300 Area Unit (Project) Managers Meeting Documentation – An IAMIT decision/determination was approved regarding information that will be provided at the 100/300 Area project manager meetings. This action was closed and will be removed from the action tracking table.
- C) IAMIT Decision/Determination 2018-013: 200 Area Project Managers Meeting Documentation – An IAMIT decision/determination was approved regarding information that will be provided at the 200 Area project manager meetings. This action was closed and will be removed from the action tracking table.

**2) Topic: Proposed New Action Items**

- A) There were no new action items proposed during today's IAMIT.

**3) Topic: Other**

- A) Sensitivity Analysis on Groundwater Recharge Rates – See discussion below under agenda item E. Ecology stated that there is agreement this topic does not have to be elevated, but it would support presenting it for discussion at the next IAMIT (2/14/19). It was agreed that Ecology and DOE-RL will each provide a presentation at the next IAMIT. MSA noted that Ecology had sent DOE-RL a letter regarding this topic, and depending on DOE-RL's response, the parties could enter into formal dispute. DOE-RL stated that the discussion at the next IAMIT will determine the next steps.
- B) PCB Method 8082 vs. 1668A – See discussion below under agenda item E. It was agreed to include this topic on the agenda for discussion at the next IAMIT (2/14/19).
- C) Introductory Discussion: Baseline Risk Assessment for Waste Management Area C Issue Resolution – DOE-ORP stated that the four areas that fall under baseline risk assessment that need to be discussed and resolved are the food chain pathway, groundwater ingestion, hazard indices calculations, and judgmental samples. DOE-ORP stated that these issues have been worked at the project manager level for a long period of time, but had not been moving forward. DOE-ORP indicated that the purpose of bringing the issue to the IAMIT is to present and document all of the parties' positions, and to be able to make a decision without going through formal dispute.

DOE-RL noted that an issue paper was developed while working with Ecology's team, and the group decided that the end result comments could be addressed by four issues. DOE-RL stated that each side agreed to work on its respective point of view, with the goal of developing a mutual paper to present to the IAMIT on the four issues. DOE-RL stated that it is prepared to send Ecology a position paper on the four issues. Ecology requested a commitment that DOE-RL would send the paper at least a week in advance of the next IAMIT. DOE-RL responded that the paper would probably be sent to Ecology today.

Ecology referred to the discussion regarding the process for adding items to the IAMIT agenda (see agenda item E) and its request to include disputes coming from the project manager meeting, and asked if the WMA-C discussion at the next IAMIT will be considered a discussion or in dispute. DOE-ORP responded that the Baseline Risk Assessment/WMA-C topic is not in dispute, and it will be presented at the IAMIT for discussion and potential resolution or a decision to go into dispute. DOE-RL stated that it needed to be clarified that there is an IAMIT process and a formal TPA dispute. DOE-RL added that if the intent is to resolve a disagreement at the IAMIT, it could be documented through an IAMIT determination if an agreement is reached; but if agreement is not reached, the parties would enter into the formal TPA dispute process.

There was a brief discussion regarding the use of an IAMIT determination to document an agreement that was not in dispute but brought to the IAMIT for discussion. Ecology stated that an IAMIT determination was used when the pro-UCL issue, which was not in dispute, was brought the IAMIT. *The parties agreed that an IAMIT determination could be used to document an agreement on an issue that was discussed at the IAMIT but was not in dispute.*

- D) TPA Paragraph 148/149 Resolution – DOE-RL stated that this topic is on the agenda for tracking purposes, and it is not in dispute. EPA noted that part of the holdup in moving forward with paragraph 148/149 is setting up its attorney review and ensuring the attorney has all the information that is needed for the review. DOE-RL stated that it is important that EPA has all the information it needs and will provide whatever EPA requests.
- E) Discussion: Process for Adding Items to IAMIT Agenda and Action Tracking – Ecology stated that it had requested removing agenda item A, sensitivity analysis on groundwater recharge rates, for discussion today. Ecology noted that a letter was sent to DOE-RL on Tuesday (1/29/19), which states Ecology's position on this topic, and a hard copy of the letter was distributed during today's IAMIT. Ecology added that there are several items on the agenda that Ecology had not agreed to discuss.

Ecology stated that the process for adding agenda items to the IAMIT needs ensure that the Ecology point of contact (POC) for each agenda item has been identified and is prepared to speak at the IAMIT. Ecology noted that one of the agenda items did not identify the Ecology POC. Ecology added that IAMIT agenda items are not just DOE and Ecology issues, and that EPA needs to be involved as well. Ecology indicated that EPA had not been included on the agenda items for today's IAMIT.

DOE-RL acknowledged but disagreed with Ecology's position, and referred to TPA Section 4.2, pg. 4-3, which talks about the IAMIT and the purposes of the meetings. DOE-RL pointed out that the section does not limit the meetings to issues that are in formal dispute. DOE-RL stated that its position is the IAMIT is a good format for discussing topics that have been languishing, in particular the two topics on today's agenda regarding sensitivity analysis and the PCB method that have been languishing since September of last year.

Ecology responded that DOE-RL's point is well taken, but there needs to be preparation between the respective project managers to allow them to be prepared to discuss both sides of the issue at the IAMIT. Ecology indicated that that coordination had not occurred with the Ecology project manager. DOE-RL responded that its understanding was there had been coordination on one of the issues, and that problem statements were being drafted. Ecology pointed out that its understanding was that the parties were following the Kaizen method that had been developed a few years ago, but DOE-RL was now creating a new method. Ecology stated that is the reason it has specified its position needs to be stated and why the two letters were issued to DOE-RL regarding sensitivity analysis and the PCB method. Ecology stated that DOE-RL is not following the process that has been developed to address this type of issue, and it is being elevated prematurely to the IAMIT. DOE-RL stated that the issues are not being brought to the IAMIT prematurely since they have been languishing since September. Ecology responded that the issues have been ongoing for a long period of time in an attempt to understand each other's position, and it was incorrect to characterize them as languishing since September.

Ecology referred to the method developed through the Kaizen that had been agreed to, which led to some process improvements and a dispute resolution process, and the Ecology team believes that the process has not been followed. DOE-ORP requested clarification on the Kaizen method that had been agreed to by the parties. Ecology noted that it was a DOE-RL Kaizen process. Ecology explained that the Kaizen process was that each party would develop an issue statement, followed by a discussion justifying each position in the same white paper. Ecology stated that as the parties work through the process on the technical level, a clearer understanding is often reached on each agency's position, which could then result in an agreement without elevating to the IAMIT or going to formal dispute resolution. Ecology stated that if an agreement cannot be reached at the technical level, the background work has already been done if it goes to formal dispute resolution. Ecology added that if agreement cannot be reached in the Kaizen process, the parties could agree to bring it to the IAMIT for resolution before going to formal dispute resolution.

DOE-RL noted that the Kaizen process was an effort to streamline the CERCLA documentation process, and Ecology and EPA were involved in the development of the CERCLA documents using the Kaizen process, which proved to be successful. DOE-RL pointed out that in the past when a document was drafted, there would be hundreds of comments. DOE-RL stated that using the Kaizen process yielded 30 comments, and two of those comments have resulted in the issues with sensitivity analysis and the PCB method. DOE-RL stated that the Kaizen method covers more than just the dispute process that Ecology had just referred to, but also covers how documents are developed and how to streamline the review and approval process. DOE-RL added that the review and comment resolution process was identified as the most time-consuming area, and a method was implemented to involve the respective agencies in the development of the document and identify issues or comments early in the process.

DOE-RL stated that its position is the parties are past the informal or formal project management method of dispute that Ecology was discussing, and that there is an understanding of each party's position. Ecology responded that it was not in complete agreement with DOE-RL, and the letters sent to DOE-RL propose that more detail could be provided regarding Ecology's position.

Ecology noted that the discussion is moving into the specific issues, and stated that the discussion regarding coordinating the process for adding items to the IAMIT agenda needs to be addressed. Ecology added that including agenda items without notifying EPA or Ecology does not represent good coordination. DOE-RL responded that there was discussion during the last IAMIT about including these agenda items, and it is reflected in the meeting minutes. Ecology pointed out that the agenda item regarding baseline risk assessment for WMA-C lists Ecology as TBD, which is a clear indication that there was no coordination.

Ecology stated that for the past few years, the parties have recognized that a forum was needed to discuss issues, and that forum could possibly be identified within the context of the IAMIT. DOE-RL stated that there isn't a mechanism for bringing up issues and reaching a quick resolution or setting a pathway for resolution, and it views the IAMIT as the ability to achieve those resolutions. DOE-RL added that there could be discussion about the process for getting items on the IAMIT agenda, and the IAMIT does not necessarily have to reach a resolution, but it could be the forum for establishing a pathway to resolution. Ecology agreed that the IAMIT is a good forum for moving an issue forward. Ecology stated that items on the agenda should be a joint presentation by the two project managers and possibly involving the other regulatory agency, and that was not the process for the topics on the IAMIT agenda today. DOE-RL agreed with Ecology about a joint presentation for an agenda item.

Ecology noted that it had been seeking resolution for over a year regarding today's agenda item on WMA-C, and it had made a proposal to take an action to dispute the issue at the project managers meeting (PMM), but DOE-RL did not take on the proposal. Ecology suggested that a process could be established for a dispute issue to be included on the PMM agenda for discussion, which would provide the opportunity to be prepared for dispute with presentations at the next PMM, to be followed with a presentation at the next IAMIT.

EPA pointed out that the IAMIT is not just for disputes, and reiterated DOE-RL's point that an agenda item may not get resolution at the IAMIT, but a decision could be made about moving the issue forward.

DOE-ORP suggested adding a standing agenda item for the IAMIT to identify what topic or issue a party needs to discuss at a future meeting. Ecology agreed with DOE-ORP's suggestion. Ecology also suggested that the IAMIT agenda reflect items from the PMM so it's clear that the project managers have discussed the item and requested it to be discussed at the IAMIT. Ecology added that the request to discuss an item at the IAMIT would not necessarily mean it's in dispute. DOE-ORP stated that if a

party is ready to bring an item to the IAMIT, it should be allowed to do so, even if another party indicates it is not ready because it does not want to be viewed as being unable to resolve an issue. Ecology agreed with DOE-ORP's statement, but added that all three agencies should be in agreement to discuss an issue at the IAMIT with enough advance notice.

DOE-RL stated that one way of ensuring all the agencies are aware of the IAMIT topics is to circulate the agenda earlier, which would allow time for discussion if a representative is opposed to the topic. Ecology stated that it would be helpful to identify a topic a month in advance to allow the parties time to prepare for a discussion or a presentation. MSA noted that the IAMIT is a formal step in a formal dispute process, and the parties need to delineate the purpose of an agenda item.

The parties agreed to identify topics for discussion at the IAMIT at least a month in advance. It was also agreed that if a topic is identified before the draft agenda is circulated, it could be added to the agenda, but a party would have the ability to state it is not ready to discuss the topic. MSA will send out the draft and final agenda, and note in the email if there are any additions to the agenda. The agenda will have a set amount of time for each party to make their presentation, and then there will be a certain amount of time for a follow-on discussion.

DOE-RL stated the expectation is that before the presentations are made at the IAMIT, the parties will have shared the information with the other agencies for transparency purposes. DOE-RL added that it will also preclude the need to review the background of an issue and allow the parties to focus on the points of emphasis. EPA agreed with DOE-RL's comments, noting that the baseline risk assessment may have applicability elsewhere, and it is interested in the presentations. DOE-RL and Ecology agreed to provide copies of their position papers to EPA regarding the baseline risk assessment issue. DOE-RL and Ecology agreed that one of the expectations for the position papers is to provide a technical and regulatory basis.

The parties agreed to schedule the next IAMIT on February 14, 2019, due to the potential for a government shutdown on February 15, 2019, which would preclude EPA from attending. MSA noted that the recently-agreed to time to start the IAMIT is 8:30, which allots a half hour for the meeting if it is before a quarterly milestone review meeting. It was suggested that there may be a sliding start time, depending on the IAMIT agenda. The February 14, 2019 IAMIT is a stand-alone meeting and will not be followed by a quarterly meeting.