

Inter-Agency Management Integration Team (IAMIT)
Meeting Minutes
February 18, 2010

Approval: _____

J. Hedges

Ecology IAMIT Representative

Date: 3/18/10

Approval: _____

M.S. McCormick

DOE IAMIT Representative

Date: 3/23/10

Approval: _____

D.A. Faulk

EPA IAMIT Representative

Date: 3/24/2010

Minutes Prepared by: _____

T.W. Noland

Mission Support Alliance, LLC

Date: 3/24/2010

Black, D.G.*	CHPRC	Jim, R.	Yakama
Bohnee, G.	NPT	Knox, K.*	KCR
Bond, R.	Ecology	Lobos, R.A.	EPA
Brockman, D.A.	RL	Louie, C.S.	RL
Buelow, L.C.	EPA	Luke, J.J.	WRPS
Call, P.K.	RL	Mandis, M.L.*	Ecology
Cameron, C.E.*	EPA	McCormick, M.S.*	RL
Charboneau, B.L.	RL	Menard, N.M.*	Ecology
Charboneau, S.L.	ORP	Moore, S.L.	MSA
Cimon, S.	ODE	Morrison, R.D.*	YAH
Cusack, L.J.	CHPRC	Niles, K.	OOE
Donnelly, J.W.	WCH	Noland, T.W.*	FFS
Engelmann, R.H.	CHPRC	Peterson, K.A.	MSA
Einan, D.R.*	EPA	Pfaff, S.H.	ORP
Faulk, D.A.	EPA	Piippo, R.E.*	CHPRC
Fort, L.A.	Ecology	Potter, R.D.	MSA
Foss, D.L.*	CHPRC	Price, J.B.*	Ecology
Franco, J.R.*	RL	Russell, R.W.	ORP
French, M.S.	RL	Singleton, D.G.*	Ecology
Gadbois, L.E.	EPA	Skinnarland, E.R.	Ecology
Harris, S.	CTUIR	Weil, S.R.	RL
Hedges, J.A.	Ecology	Whalen, C.L.*	Ecology
Henry, D.	OOE	Williams, J.D.*	CHPRC
Holtan, R.A.	RL	Williamson, B.D.	RL
Huffman, L.A.	ORP	Administrative Record	
Jaraysi, M.N.	CHPRC	* Attendees	

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**Inter-Agency Management Integration Team (IAMIT)
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Key Documents/Issues List Review

An updated table of regulatory documents forecast was provided. No issues were identified for discussion and it was noted that the list had been reformatted in an effort to simplify the format.

Topic: TPA Administration/Republish TPA

Ecology suggested pushing out the date for republishing the TPA due to two issues arising from current TPA negotiations: 1) the extended resolution of the state of Washington vs. Energy Secretary Chu settlement; 2) changing the references from the federal RCRA statute to the Washington Administrative Code. DOE-RL concurred with Ecology's proposal, adding that time needs to be allocated to gather all the change package information for inclusion in the TPA. MSA stated that the intent is to establish a team with DOE-RL, EPA and Ecology to work on the details, and then report to the IAMIT on the status and eventually prepare a schedule for reprint.

Public Review on Draft CERCLA 5-Year Review

Ecology addressed the proposed approach to not hold a public review on the CERCLA five-year Record of Decision (ROD) review. Ecology believes that there will be negative feedback if a public review is not scheduled. Ecology stated that during the last five-year review, the Tri-Parties made a verbal commitment to conduct a public review. The reason for the commitment was the concern expressed during the public review about the interim action remedies and the River Corridor remedies being final. Ecology suggested that the parties plan for a public review, rather than not being prepared for one, so that the schedule would not be affected late in the process if a public review were requested.

DOE-RL noted that there's no requirement for a public review, and the team that was tasked with scheduling the five-year review worked to that requirement. DOE-RL indicated it would possibly consider having an informal public review as was done for the Hanford Site Cleanup Completion Framework. DOE-RL recommended not preparing a comment response. DOE-RL noted that the document will be prepared as a collaborative effort with the regulators, the tribes, and the Hanford Advisory Board (HAB). DOE-RL agreed to provide a status at the next IAMIT (3/18/10).



Thursday, February 18, 2010
Ecology Offices, Conference Room 3A/B
3100 Port of Benton Way
Richland, Washington

Agenda

Inter-Agency Management Integration Team Meeting

Chairperson: Jane Hedges

11:30 a.m.	Key Documents/Issues List Review
11:40 a.m.	TPA Administration/Republish TPA
11:50 a.m.	Public Review on Draft CERCLA 5 Year Review
12:00 Noon	Adjourn Inter-Agency Management Integration Team Meeting

Regulatory Documents Forecast										Version Date: 2/18/2010
Contractor	Geographical Area	DOE-RL Lead	Document Title	Regulatory Lead			Reg. Review Start Dates	Reg. Review Completion Dates	ARRA	Comments/Issues
				DOH	EPA	Ecology				
CHPRC	100 Area	G. Sinton	100 Area ESD to Interim ROD Amendment for ISRM Barrier for In Situ Reduction (ISR)			X	1/15/2010	2/15/2010		
CHPRC	100 Area		100-HR-3 Bio-injection Treatability Test Plan			X	3/1/2010	4/1/2010		
CHPRC	100 Area		Hexavalent Chromium Focused Feasibility Study for the 100 Areas		X	X	6/7/2010	7/21/2010		EPA and Ecology have agreed to suspend work on this document. TPA Change Request will be initiated to modify milestone deliverable.
CHPRC	100-D/H Area	J. Hanson	100-HR-3 - Revision to the RD/RAWP for DX and HX Pump and Treat System			X	5/18/2010	7/2/2010		
CHPRC	100-H Area	J. Hanson	100-HR-3 Bioreactor Treatability Test Plan			X	3/1/2010	4/1/2010		
CHPRC	100-K Area	E. Dagan	Air Monitoring Plan for 105-KE Reactor Core Sampling- pending		X			2/18/2010		
CHPRC	100-K Area	E. Dagan	DOE/RL-2005-33, Rev 1, 100-K Area Interim Safe Storage and D4 Project Waste Sampling and Analysis Plan (New TPA CN for 105-		X			Complete		
CHPRC	100-K Area	E. Dagan	100-K-42, 105-KE Fuel Storage Basin Demolition Removal Action Closure Report		X		2/24/2010	3/26/2010		
CHPRC	100-K Area		DOE/RL-2008-07 Rev. 1 Engineering Evaluation/Cost Analysis Addendum, Decisional Draft				3/1/2010	4/1/2010		
CHPRC	100-K Area		General Buildings/Debris Action Memorandum				3/2/2010	3/17/2010		
CHPRC	100-K Area		General Buildings/Debris Removal Action Work Plan				3/4/2010	3/18/2010		
CHPRC	100-N Area	M. K. Thompson	100 N Decision Unit Work Plan Addendum 5			X	12/23/2009	2/22/2010		
CHPRC	100-N Area	M. K. Thompson	100-NR-2 Draft Proposed Plan Amend ROD for Interim Action or to Propose a new ROD (M-015-61 12/30/09)			X	12/19/2009	2/2/2010 Dft B		Ecology met to resolve only the big issues and otherwise halted their internal review. Ecology will be conducting the detailed review upon receipt of the revised document that clarifies those big issues.
CHPRC	200 East	F. Roddy	200-MW-1 RI/FS Report		X		2/26/2010	4/11/2010		
CHPRC	200 East		PUREX Ancillary Facilities EE/CA			X	7/12/2010	8/24/2010		
CHPRC	200 West	A. Tortoso	200-PW-1,3,6, Feasibility Study		X		4/28/2010	5/27/2010	X	Current date is unachievable. Working with RL to finalize schedule
CHPRC	200 West	G. Sinton	CW-5 Feasibility Study		X		3/10/2010	4/23/2010	X	Current date is unachievable. Working with RL to finalize schedule
CHPRC	200 West	A. Tortoso	Z Area Proposed Plan		X		6/6/2010	7/20/2010	X	Current date is unachievable. Working with RL to finalize schedule
CHPRC	200 West	K. Leary	200-UW-1 Proposed Plan			X	6/30/2010	8/14/2010		Agencies have requested additional characterization information prior to submittal of the PP. Working with RL and Ecology to establish new date.
CHPRC	Outer Area	K. Leary	200-SW-1 Regulator Review SWL Closure Plan			X	11/3/2009	2/2/2010		
CHPRC	NRDWL/Misc	K. Leary	NRDWL WAC 173-350 Closure Plan			X	11/3/2009	2/2/2010 2/16/2010		
CHPRC	Outer Area		DOE/RL-2007-54, Rev. 0, Sampling and Analysis Plan for Remediation of 200 North Area Waste Sites Located in the 200-CW-3 Operable Unit - revision via TPA-CN-295		X		10/6/2009	1/21/2010		
CHPRC	Outer Area		DOE/RL-2007-55, Remedial Design/Remedial Action Work Plan for 200 North Area Waste Sites Located in the 200-CW-3 Operable Unit, Rev. 0 - revision via TPA-CN-296		X		10/6/2009	1/21/2010		
CHPRC	Outer Area	F. Roddy	Action Memo for MG-1 (37 Outer Area Sites), Draft A			X	1/4/2010	2/1/2010		
CHPRC	Outer Area	F. Roddy	Action Memo for MG-1 (37 Outer Area Sites), Rev 0			X	2/1/2010	2/10/2010		
CHPRC	Outer Area	F. Roddy	RAWP for MG-1 (37 Outer Area Sites), Draft A			X	2/1/2010	3/1/2010		
CHPRC	Outer Area	F. Roddy	RAWP for MG-1 (37 Outer Area Sites), Rev 1			X	3/20/2010	3/30/2010		
CHPRC	Outer Area	F. Roddy	SAP for MG-1 (37 Outer Area Sites), Draft A of Rev 1			X	2/1/2010	3/1/2010		
CHPRC	Outer Area	F. Roddy	SAP for MG-1 (37 Outer Area Sites), Rev 1			X	3/20/2010	3/30/2010		
CHPRC		M. Collins	TRU Retrieval Notice of Construction (AIR 07-1012)	X			2/1/2010	6/1/2010		
CHPRC		G. Sinton	Remedial Design Report		X	X	1/29/2010			
CHPRC		G. Sinton	Record Of Decision Annotated Outline		X	X	3/1/2010			
CHPRC		G. Sinton	Response Action Report Annotated outline		X	X	2/22/2010			
CHPRC		G. Sinton/M. Jarvis	ALARACT Annotated Outline	X			12/1/2009	Complete		
CHPRC		G. Sinton/M. Jarvis	Air NOC Annotated Outline (Radiological)	X			3/8/2010			
CHPRC		G. Sinton	Removal Action WP Annotated Outline		X	X	1/29/2010			
CHPRC		G. Sinton/M. Jarvis	Air Monitoring Plan Annotated Outline		X	X	3/15/2010			
CHPRC		A. Tortoso	200-ZP-1 O&M Plan		X		5/22/2010	7/5/2010	X	
CHPRC		A. Tortoso	200-ZP-1 Remedial Design Report, Draft A		X		5/17/2010	6/30/2010	X	
CHPRC		A. Tortoso	200-ZP-1 Integrated Groundwater Monitoring Plan		X	X	2/6/2010	3/22/2010	X	Merging document with Performance Monitoring Plan. Document will be an appendix to the O+M Plan.
CHPRC		A. Tortoso	200-ZP-1 Performance Monitoring Plan		X	X	2/6/2010	3/22/2010	X	Integrated Monitoring Plan being integrated into this report. Document will be an appendix to the O+M Plan.
CHPRC			100 Areas Bio/Chem Remediation Proposed Plan		X	X	6/7/2010	7/21/2010		EPA and Ecology have agreed to suspend work on this document. TPA Change Request will be initiated to modify milestone deliverable.
			RCBRA Report, Volumes 1 and 2				7/1/2010			
			PMP for TRU & MLLW				6/30/2009	1/31/2010		If it needs to be extended further, this action must happen before Jan 31
			PMP for TRU & MLLW				6/30/2010			With the need for another revision upcoming at the same time the previous revision is being commented on, there may be need for an understanding with the regulators that the versions can be combined.

List of Possible TPA Updates for Reprint

Section	Lead	Comments
Cover page	IAMIT members	Noland et al. develop candidate photographs
Article XXIX Recovery of State Costs	Cliff Clark (DOE) John Price (ECY)	See detail at end of table. Mainly reconciliation w/ Ecology calendar.
Article XLVIII (paragraph 148/149)	IAMIT discussion	Some changes have been desired, but Tri-Parties unable to reach resolution for Revision 7
Action Plan Section 8	McCormick	<ul style="list-style-type: none"> • Key facilities process needs updating • Included in CP AIP negotiations
Action Plan Section 9.6	Cliff Clark	Data access requirements may be inconsistent with security requirements developed after 9/11
Appendix B	McCormick	<ul style="list-style-type: none"> • Included in CP AIP negotiations • Ecology has other suggested changes
Appendix C	Noland	Make current for all previous changes after Rev 7 published
Appendix C	McCormick	Included in CP AIP negotiations
Appendix D	Noland	Make current through cutoff date TBD
Appendix F	Noland	Hasn't been updated since ~1994 Poll whether any parties want to revise & retain it, or drop it
Appendix I	S. Charboneau	Included in Settlement Agreement proposal change packages
Appendix J	McCormick	*NEW* section included in CP AIP negotiations
Section 11.8, Item F	Noland/Russell	SMS Report no longer used. Delete or replace
Legal Agreement editorial, status updates, clarifications and process improvements	Noland and Team	See attached detail. Propose a Tri-Parties/MSA Team work through the list of proposed changes and bring any issues to the IAMIT.

Action Plan editorial, status updates, clarifications and process improvements	Noland and Team	See attached detail. Propose a Tri-Parties/MSA Team work through the list of proposed changes and bring any issues to the IAMIT.
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Detail on revision of Article XXIX Recovery of State Costs:

- 99(A)(2) – Change date of preliminary billing statement reflecting upcoming billing from June 15 to July 15.
- 99(A)(2) – Revise requirement for itemization of changes between preliminary billing statement and final billing statement. Revision would be to have itemization occur via separate correspondence and/or as part of quarterly budget meeting.
- 99(A)(3) and 99(B)(5) – A seven year forecast is required by January 31. Ecology begins it's biennial and annual planning cycle in February and completes in by June. If the seven year forecast was submitted July 31, it would be informed by current year program planning rather than previous year planning, which is currently the case.

Proposed Changes to Legal Agreement for TPA Reprint Revision 8

1. Update (attachment no longer exists).

Summary, page 2

This Agreement also consists of Attachment 1, a letter dated February 26, 1989 from the Department of Justice to the Department of Ecology, and Attachment 2, and the Action Plan, ~~and Attachment 3, the Mutual Cooperation Funding Agreement between the Department of Ecology and the Department of Energy.~~ In the event of any inconsistency between this Agreement and the attachments to this Agreement, this Agreement shall govern unless and until duly modified pursuant to Article XXXIX of this Agreement.

2. Add CERCLA Section 104 to be consistent with paragraph 7 of Article I, which states that the District Court concluded that the "Agreement embodies an integrated response action under Sections 120 and 104 of CERCLA."

Part One, Introduction, Article I, Jurisdiction, #1

1. The U.S. Environmental Protection Agency (EPA), Region 10, enters into this Agreement pursuant to Sections 104 and 120(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. Section 9620(e), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), Pub. L. 99-499 (hereinafter jointly referred to as CERCLA), and Sections 6001, 3008(h), and 3004(u) and (v) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sections 6961, 6928(h), 6924(u) and (v), as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), Pub. L. 98-616 (hereinafter jointly referred to as RCRA) and Executive Order 12580.

3. Update to current status (placed on NPL in 1989).

Part One, Introduction, Article I, Jurisdiction, #6

~~6. The Parties are entering into this Agreement in anticipation that the Hanford Site will be placed on the National Priorities List (NPL), 40 CFR Part 300. The Hanford Site has been listed by EPA on the federal agency hazardous waste compliance docket under CERCLA Section 120, 52 Federal Register 4280 (Feb. 12, 1988). Four subareas of the Hanford Site have been proposed by EPA for addition to the NPL, 53 Fed. Reg. 23988 (June 24, 1988).~~

~~[Note: The four areas of the Hanford Site were officially listed on the NPL on November 3, 1989 (Federal Register 41015, October 4, 1989)]. One area, the 1100 Area, has since been removed from the NPL (Federal Register 51019, September 30, 1996).~~

4. Add citation.

Part One, Introduction, Article III, Purpose, #14.C

C. Ensure compliance with RCRA (42 USC Section 6901 et seq.) and the Washington Hazardous Waste Management Act (HWMA), Ch. 70.105 RCW, for TSD Units including requirements covering permitting, compliance, closure, and post-closure care.

5. Add citation.

Part One, Introduction, Article IV, Statutory Compliance and RCRA/CERCLA Integration and Coordination, #17

The Parties agree that with respect to releases covered by this Agreement, RCRA, and RCW Chapters 70.105 and the Model Toxics Control Act (Initiative 97) as codified beginning March 1, 1989 (Chapter 70.105D RCW), shall be incorporated where appropriate as "applicable or relevant and appropriate requirements" pursuant to Section 121of CERCLA.

6. Add citation.

Part One, Introduction, Article IV, Statutory Compliance and RCRA/CERCLA Integration and Coordination, #20

Ecology will administer the HWMA, in accordance with this Agreement, including those provisions which have not yet been authorized under RCRA Section 3006 (42 U.S.C Section 6926).

7. Editorial.

Part One, Introduction, Article V, Definitions, #22.R

R. "Lead regulatory agency" is that agency (EPA or Ecology) which is assigned regulatory oversight responsibility with respect to actions under this Agreement regarding a particular Operable Unit, TSD Unit/Group or Milestone pursuant to Section 5.6 of the Action Plan.

8. Editorial.

Part One, Introduction, Article V, Definitions, #22.S

S. "Radioactive Mixed Waste" or "Mixed Waste" areis wastes that contains both hazardous waste subject to RCRA, as amended, and radioactive waste subject to the Atomic Energy

Act of 1954, as amended.

9. **Eliminate undefined and unneeded term within definition.**
Part One, Introduction, Article V, Definitions, #22.G
 G. "Days" mean calendar days, unless otherwise specified. Any submittal, ~~written notice of position or~~ written statement of dispute that would be due under the terms of this Agreement on a Saturday, Sunday or federal or state holiday shall be due on the following business day.

10. **Change definition for consistency with definition in Action Plan, Section 3.1**
Part One, Introduction, Article V, Definitions, #BB
 BB. "Waste Management Unit" means an individual location on the Hanford Site where waste has or may have been placed, either planned or unplanned, as identified in the Action Plan, that may require action to mitigate a potential environmental impact.

11. **Update to current title.**
Part Two, Permitting/Closure of TSD Units/Groups, Article VII, Work, #29
 This notice shall be sent to the Director for DOE's Office of Environmental Management Division Assurance, Permits & Policy no later than seven (7) days before Ecology intends to take formal enforcement action.

12. **Update organization title.**
Part Two, Permitting/Closure of TSD Units/Groups, Article VIII, Resolution of Disputes, #30.D
 Upon request and prior to resolution of the dispute, Ecology's Assistant Deputy Director ~~for Waste Management~~ shall meet with the Deputy Manager of U.S. Department of Energy, Richland Operations Office (DOE-RL) to discuss the matter.

13. **Update title.**
Part Four, Integration of EPA and Ecology Responsibilities, Article XXVI, Dispute Resolution, #92.C
 C. The Ecology designated member of the SEC is the Assistant Deputy Director ~~for Waste Management~~.

14. **Add detail to clarify statement.**
Part Two, Permitting/Closure of TSD Units/Groups, Article

VIII, Resolution of Disputes, #30.I

DOE shall abide by all terms and conditions of a final resolution of any dispute. Within twenty-one (21) days of the final resolution of any dispute under this Article, or under final resolution of any appeal action to either the PCHB or the courts, DOE shall incorporate the resolution and final determination, or final resolution of any appeal action into the appropriate plan, schedule or procedure(s) and proceed to implement this Agreement according to the amended plan, schedule or procedure(s).

15. Add additional conditions to clarify statement.**Part Two, Permitting/Closure of TSD Units/Groups, Article IX, Stipulated Dangerous Waste Penalties, #31**

No assessment of a stipulated penalty shall be final until the conclusion of Dispute Resolution procedures on DOE's failure to comply, including final resolution of any administrative or judicial appeals.

16. Add citation.**Part Two, Permitting/Closure of TSD Units/Groups, Article IX, Stipulated Dangerous Waste Penalties, #34**

34. All funds collected by the State from DOE penalties under this Agreement shall be used by the State as provided by the Federal Facility Compliance Act, Section 102(b) (42 U.S.C Section 6961(c)).

17. Eliminate incorrect organization name.**Part Two, Permitting/Closure of TSD Units/Groups, Article X1, Schedule, #42.A**

42. A. Tank ~~W~~waste ~~R~~remediation System milestones will be established in accordance with Section 11.8 of the Action Plan.

18. Simplify to be consistent with similar dispute resolution process description in #21.B.**Part Three, Remedial and Corrective Actions, Article XVI, Resolution of Disputes, #59.D**

D. The IAMIT will serve as a forum for resolution of disputes for which agreement has not been reached through informal dispute resolution. ~~EPA and DOE shall each designate in writing one individual and an alternate to serve on the IAMIT. The individuals designated to serve on the IAMIT shall be employed at the Executive Managers level.~~ The EPA representative on the IAMIT is the Program

Manager, Hanford Project Office of EPA Region 10. DOE's representative on the IAMIT will be the Assigned Executive Manager.

19. **Delete 5-year review of agreement to coincide with the periodic reviews necessary to keep the document current, i.e., when there are significant changes to cleanup strategies or RCRA/HWMA Compliance strategies. Part Five, Common Provisions, Article XLIII, Duration/Termination, #132**

132. The Parties agree that due to the long-term commitments contained in this Agreement, this Agreement will be reviewed periodically by the Parties ~~five (5) years from the date of execution of this Agreement, and at the conclusion of every five (5) year period thereafter.~~ The purpose of this review will be to determine (1) whether there has been substantial compliance with the terms of the Agreement and, (2) the need to modify the Agreement. This review will be made by a committee composed of representatives from each Party. Modifications to the Agreement will be made in accordance with Section 12.0 of the Action Plan. If the Parties do not unanimously agree that there has been substantial compliance with the terms of the Agreement, EPA and Ecology reserve the right to withdraw from the Agreement; provided, however, that all Parties shall comply with all provisions of this Agreement from the effective date of the Agreement to the date of the withdrawal. Further provided, however, that no Party may base its withdrawal from this Agreement on its own substantial noncompliance with this Agreement. Regardless of any Party's withdrawal under this paragraph, all parties shall comply with all provisions of this Agreement as they relate to operable units where a remedial investigation or RCRA facility investigation workplan has already been approved, unless the Parties agree otherwise. Any Party withdrawing from this Agreement shall notify the other Parties in writing.

20. **The term "field modifications" is undefined, but minor field changes are defined in section 12 of the Action Plan. Part Five, Common Provisions, Article XXX, Additional Work or Modification to Work**
Minor fField changes ~~modifications~~, as set forth in the Action Plan, are not subject to this Article.

21. **Add plant mail delivery, as this is common practice.**
Part Five, Common Provisions, Article XXXIII, Notification, #108 and #109

108. Unless otherwise specified, any report or submittal provided by DOE pursuant to a schedule or deadline identified in or developed under this Agreement (including the Action Plan) ~~shall~~may be sent by certified or overnight express mail, return receipt requested, or hand delivered as required to the address of the lead regulatory agency project manager. Reports or submittals pursuant to a schedule or deadline may be sent by plant mail, but the receipt date shall be date stamped by the lead regulatory agency project manger's correspondence control.

109. Documents sent to the DOE by EPA or Ecology which require a response or activity by DOE pursuant to this Agreement ~~shall~~may be sent by certified or overnight express mail, return receipt requested, or hand delivered as required to the address of the DOE project manager. Documents sent to the DOE which require a response or activity may be sent by plant mail, but the receipt date shall be the date stamped by the DOE project manager's correspondence control.

22. **Add clarification that records are not necessarily the original document.**
Part Five, Common Provisions, Article XXXVI, Retention of Records, #113

113. Each Party to this Agreement shall preserve for a minimum of ten (10) years after termination of this Agreement all of the records in its or its contractors possession related to sampling, analysis, investigations, and monitoring conducted in accordance with this Agreement. Record copies are not necessarily the original document. After this ten year period, DOE shall notify the EPA and Ecology at least forty-five (45) days prior to destruction or disposal of any such records. Upon request, the Parties shall make such records or true copies available, to the other Parties subject to Article XLV (Classified and Confidential Information).

Proposed Changes to Action Plan for TPA Reprint Revision 8

1. **Update to current status.**

Executive Summary, page 1, 2nd paragraph

~~Currently DOE plans to phase~~ DOE has phased out the defense production missions of Hanford, with the new emphasis of the Site being research and development, cleanup of waste units resulting from past operations, and achieving compliance with Federal and State laws.

2. **Eliminate specific numbers of waste management units; Treatment Storage or Disposal Groups; and Operable Units to keep text from being out of date.**

Executive Summary, page 2, 2nd paragraph

~~There are over 50~~ Treatment, Storage or Disposal (TSD) Groups/Units on the Hanford Site (see Appendix B) which must be permitted and/or closed in accordance with RCRA and the State of Washington HWMA.

Executive Summary, page 2, 3rd paragraph

These operations have resulted in numerous (see Appendix C) ~~approximately 1000~~ past practice units that must be investigated and, if necessary, cleaned up.

Executive Summary, page 6, 2nd paragraph

The ~~approximately 55~~ TSD groups on the Hanford Site ~~are~~ identified in Appendix B as are those which will continue to operate, and those which are to be closed.

Executive Summary, page 6, 3rd paragraph

~~Approximately 1000~~ past-practice units are identified in Appendix C. They have been grouped into ~~approximately 74~~ operable units for the purposes of investigation and cleanup (see Appendix C).

Section 3.0, Unit Identification, Classification, and Prioritization, 3.3, Past-Practice Units, 3rd paragraph

This information, combined with operable unit identification and prioritization criteria described in this section, resulted in the ~~initial~~ designation of ~~approximately 75~~ operable units across the Hanford Site (see Appendix C).

Section 7.0, Past Practice Processes, 7.1, Introduction

~~Approximately 1,200~~ Numerous waste management units have been identified within the boundaries of the ~~560-square mile Hanford Site~~. This includes ~~approximately 1,000 past-practice units~~.

3. Update to current status

Executive Summary, page 3, 3rd paragraph

On June 24, 1988 the EPA nominated four areas of the Hanford Site for inclusion on the NPL based on the results of the PA/SI. These four areas were officially listed on the NPL on November 3, 1989 (Federal Register 41015, October 4, 1989). These are the 100 Areas, 200 Areas, 300 Area, and 1100 Area as shown on the following map of the Hanford Site. The 1100 Area has since been removed from the NPL (Federal Register 51019, September 30, 1996).

4. Replace existing map that illustrates the NPL areas with improved version

Executive Summary, page 4

Delete existing map and replace with the improved map attached as the last page.

5. Clarification (delete "all" as all regulations don't apply to each action).

Section 1.0, Introduction, 1.1, Purpose, paragraph 1

All actions required to be taken pursuant to this Agreement shall be taken in accordance with the requirements of ~~all~~ applicable Federal and State laws and regulations.

6. Align with current plans (cleanup is no longer viewed as a 30-year cleanup).

Section 2.0, Milestones, 2.3, Cleanup of Past-Practice Units

The milestones associated with operable unit investigations and cleanup support a schedule to complete all site cleanup actions in accordance with a ~~30-year~~ agreed-upon site cleanup schedules.

7. Editorial, delete undefined "aggregate area" term and improve description of target date applicability.

Section 3.0, Unit Identification, Classification, and Prioritization, 3.1, Introduction, page 3-1, paragraph 3

The generation and/or discharge of (Ecology/EPA) regulated substances or wastes, (including the treatment, storage and disposal of those substances or wastes), shall be subject to this Agreement. Appropriate specific requirements and/or

Tri-Party Agreement Milestones for the completion of key activities that generate or discharge regulated substances or wastes shall be incorporated into the Action Plan. Agreed-upon key transition, surveillance and maintenance, and disposition activities not subject to Ecology/EPA regulation that are critical path to cleanup ~~of an~~ aggregate area will may be established as target dates.

8. **Improvement (specify current document, allow additional time for issuance, which is now needed due to document release and OOU requirements).**

Section 3.0, Unit Identification, Classification, and Prioritization, 3.5, Waste Information Data System/Waste Management Units Report, page 3-5, paragraph 3

~~A~~ The Hanford Site ~~w~~ Waste ~~m~~ Management Units ~~r~~ Report, in a format agreed upon by the Parties, shall be generated as a calendar year report and issued annually by the DOE ~~in~~ January by the end of February of each year, and posted electronically for regulator and public access.

9. **Editorial correction**

Section 4.1, last paragraph, line 5

~~"...detailed rational~~ rationale for the opinion."

10. **Update to current practice (IAMIT for the most part is not the primary interface with the HAB).**

Section 4.0, Agreement Management, 4.2, Interagency Management Integration Team

Roles of the IAMIT or their designated representatives shall include the following responsibilities.

- The IAMIT shall be the first level of formal dispute resolution for those issues which remain unresolved by the project managers. It is the role of the IAMIT to act decisively and effectively to resolve issues within their respective authorities.

- The IAMIT shall have approval authority for changes to the Agreement as specified in Section 12.0 of this Action Plan.

- ~~• The IAMIT shall act as the primary interface with the established Hanford Advisory Board.~~

- The IAMIT shall serve as the primary point of focus for the three parties for discussion and resolution of budget issues.

Last paragraph (update to current practice, IAMIT meetings have evolved to resolving issues and don't always cover these listed items, which are actually more typical to the current project managers' meetings)

Signed meeting minutes will be issued to the lead regulatory agency and the administrative record by the DOE summarizing the discussion at the meeting. ~~The minutes will include, at a minimum, the following:~~

- ~~• Status of previous agreements and commitments~~
- ~~• Any new agreements and commitments~~
- ~~• Schedules (with current status noted)~~
- ~~• Any approved changes signed off at the meeting in accordance with Section 12.2.~~

11. **Clarification of intent to avoid misinterpretation.**
Section 6.0, Treatment, Storage, and Disposal Unit Process, 6.3.2, Closure as a Land Disposal Unit, first paragraph
If clean closure, as described above, cannot be achieved, the TSD unit will be closed as a land disposal unit.
(Clean closure will be decided on a case-by-case basis through appropriate permitting and/or cleanup processes. There is no intent to require efforts to clean-close land disposal units.) The process to close any unit as a land disposal unit will be carried out in accordance with all applicable requirements described at 173-303 WAC.
12. **Update to current status.**
Section 7.0, Past Practice Processes, 7.1, Introduction
The four aggregate areas were proposed for inclusion on the NPL on June 24, 1988, and were placed on the NPL on November 3, 1989 (Federal Register, October 4, 1989). The 1100 Area has since been removed from the NPL (Federal Register 51019, September 30, 1996).
13. **Correction to CERCLA term.**
Section 7.0, Figure 7-2, Comparison of Resource Conservation and Recovery Act Corrective Measure and Comprehensive Environmental Response, Compensation and Liability Act Remedial Action Process.

Preliminary Assessment/ Site Investigation <u>Inspection</u> (PA/SI)
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14. Bring in line with actual practice (OU boundaries have never been developed. As sites are scattered, OU boundaries do not make sense).

Section 7.0, Past Practice Processes, 7.2.1, Site-Wide Scoping Activity, page 7-4, paragraph 1

An ongoing scoping activity will be conducted on a site-wide basis to maintain a current listing of operable units boundaries and priorities.

15. Update to current document reference.

Section 8.0, Facility Decommissioning Process, 8.1, Introduction, page 8-1

The process is designed to integrate DOE-HQ guidance (~~U. S. Department of Energy, Office of Environmental Restoration, Decommissioning Handbook, DOE/EM-0142D, March 1994, and U. S. Department of Energy, Office of Environmental Management, Decommissioning Resource Manual, DOE/EM-0246, August, 1995, Decommissioning Implementation Guide, DOE G 430.1-4, September 2, 1999, hereafter referred to as the EM-40 Guidance Documents~~) and to ensure compliance with environmental regulations, including waste management, closure and post closure requirements under RCRA, and remedial and/or removal action requirements under CERCLA.

16. Update to current practice (index and AR is now primarily electronic).

Section 9.0, Documentation and Records, 9.4, Administrative Record, paragraph 3

An administrative record will be established for each operable unit and TSD group and will contain all of the documents containing information considered in arriving at a record of decision or permit. ~~When the investigation process begins at each operable unit or when a permit action for a TSD unit (or group of units) is initiated,~~ ~~the~~ administrative record file will be available to the public for review by Internet access during normal business hours at the following location:

~~Two additional indexes of Electronic access to the file will also be available to the public, during normal business hours, located as follows:~~

Paragraph 4

The DOE will compile and maintain the administrative record file at Richland, Washington, ~~and provide an index of the~~

~~documents to the EPA and Ecology for their respective files. At the time when the decisional document is signed, all documents forming the basis for selection of the final action(s) must have been placed in the administrative record file. All applicable documents will be available at the Administrative Record locations through one of the following methods: (1) Microfilm, (2) indexes listing documents available by request from the Richland Administrative Record office, (3) Internet access or (4) paper copies or retrieved hard copies.~~

Last Paragraph

The DOE will maintain electronic search capability for any and an index of all documents entered into the administrative record. A current copy of the index will be distributed at least quarterly to each administrative record file and each public information repository, and will be available for inspection by any of the parties. This search capability will be available to the public and each of the parties through internet access.

17. **Editorial change to bold, and remove NOD and RCRA document references as section title says section does not apply to these documents.**

Section 9.0, Documentation and Records, 9.2.1, Primary Documents, third and fourth paragraphs

~~9.2.1 Primary Documents (with exception of Part B Permit Applications and Closure/Postclosure plans)~~ **9.2.1 Primary Documents (with exception of Part B Permit Applications and Closure/Postclosure plans)**

Upon receiving written comments from the lead regulatory agency, the DOE will update the document and/or respond to the comments ~~(for closure plans, comments will be provided in the form of an NOD)~~. The response will address all written comments and will include a schedule for obtaining additional information if required. The DOE may request an extension for a specified period for responding to the comments by providing a written request to the lead regulatory agency.

Upon receiving responses to the comments on a primary document, the lead regulatory agency will evaluate the responses. In the event that the responses are inadequate, the matter will enter the dispute resolution process as set forth in the Agreement. ~~However, dispute resolution related~~

~~to NODs cannot be initiated until after two NODs have been issued by the lead regulatory agency, unless otherwise agreed to by the DOE and the lead regulatory agency. It is anticipated that the majority of the disputes will be resolved during the informal dispute resolution period. Within 21 days of completion of the dispute resolution, or within 30 days of receipt of the lead regulatory agency evaluation of the responses if there is no dispute, the DOE will incorporate the resolved comments into the document. The DOE may extend the period for revising the document by obtaining written approval of the lead regulatory agency.~~

18. **Update to current practice. (No longer a reason to have a separate list of PIR documents in the CRP, as PIRs allow AR access, and access is now electronic. TPA Table 9-3 as well as current CRP contain lists of document types applicable to the AR).**

Section 10.0, Community Relations/Public Involvement, 10.2, Public Involvement Repositories, last paragraph.

All applicable documents ~~(see listing of applicable documents in the CRP)~~ will be available at the Public Information Repository locations through ~~one~~ of the following methods: ~~(1) Microfilm, (2) indexes listing documents available by request from the Richland Administrative Record office, (3) Internet access, or (4) paper copies.~~ In addition, copies of drafts when submitted for public comment will be placed in the repositories. Any additional information or documents will be placed in the repositories as deemed necessary by the assigned executive managers. In addition to review of public comment documents at the repositories, the public may also review the electronic administrative record files during normal working hours (see Section 9.4 for discussion and location of administrative records). Internet access to the administrative record files is available at <http://www5.hanford.gov/arpir/>.

19. **Editorial and add plant mail delivery of applicable change requests**

Section 12.0, Changes to the Agreement, 12.3.4, Transmittal and Responses to Requests for Modification

12.3.4 Transmittal and Responses to Requests for mModification

A signed Class I change control form and/or response may be transmitted by mail or overnight express delivery to any Party's normal business location addressed to the

responsible signatory with copy to the responsible project manager, return receipt requested, or by hand delivery to the responsible signatory.

A signed Class II change control form and/or response may be transmitted by mail or overnight express delivery to any Party's normal business location addressed to the responsible Executive Manager with copy to the responsible project manager, return receipt requested, or by hand delivery to the responsible executive manager.

A signed Class III change control form and/or response may be transmitted by mail or overnight express delivery to any Party's normal business location addressed to the responsible project manager, return receipt requested, or by hand delivery to the responsible project manager.

Transmittal of signed change control forms and/or responses may also be made by electronic facsimile, but only if on the day of transmittal the transmitting Party notifies the intended recipient(s) by telephone of such transmittal. The recipient's agency must acknowledge receipt by return facsimile. Documents transmitted by electronic facsimile that are illegible, or that are not received in their entirety, shall not be deemed received. Transmittal of Class II and III signed change control forms may also be by plant mail, but the receipt date shall be date stamped by the receiving agency's correspondence control.

20. **Editorial, update, and/or correction.**
Appendix A, Definition of Terms and Acronyms, pages A-2, A-3, A-11, A-12, A-16, A-17, A-20, A-23, A-24, A-25, A-26
 CAMU ~~Correction~~ Corrective Action Management Unit

QUAPjPs Quality Assurance Project Plans

TWAP Tank Waste Analysis Plan's

Fast Flux Test Facility (FFTF): A liquid metal test reactor that served as a test tool for advanced reactor technology. ~~Operations at the FFTF began in April 1982 and have since expanded into other areas, such as fusion research, space power systems and isotope production.~~ The FFTF is currently undergoing deactivation and decommissioning.

Grout: A fluid mixture of cementitious materials and liquid waste that sets up as a solid mass and is used for waste fixation and immobilization. ~~The Hanford Grout facility will be regulated under the RCRA program.~~

~~Grout Campaign: The complete filling of one vault with treated waste/grout mixture.~~

~~Project Manager: The individual responsible for implementing the terms and conditions of the Agreement at the specific operable unit level on behalf of his/her respective Party. The project manager has direct responsibility for completion of targets and milestones and has authority to agree to modifications of scope and schedule, in accordance with Section 12.0 of the Action Plan. EPA, DOE, or Ecology designated individual responsible for implementing the conditions of the Agreement at the operable unit, TSD unit or milestone on behalf of his/her respective party.~~

RCRA Facility Investigation (RFI): The RCRA process of determining the extent of ~~hazardous~~ dangerous waste contamination; analogous to the CERCLA Remedial Investigation. (see Section 7.4)

RCRA Past Practice (RPP): A process by which a past practice unit containing ~~hazardous~~ dangerous wastes or ~~hazardous~~ dangerous constituents will be addressed for corrective action, regardless of the date waste was received or discharged at a unit. (see Section 7.4)

Byproduct Material: ~~Waste produced by extraction or concentration of uranium or thorium from any ore processed primarily for its source material content, including discrete surface waste resulting from uranium solution extraction processes; excludes fission products and other radioactive material covered in 10 CFR Part 20.3(3). Any radioactive material (except special nuclear material) yielded in or made radioactive by exposure to the radiation incident to the process of producing or utilizing special nuclear material, and the tailings or wastes produced by the extraction or concentration of uranium or thorium from any ore processed primarily for its source material content. (Definition is from Atomic Energy Act of 1954, as amended, 42 USC 2014(e)).~~

Treatment, Storage, or Disposal (TSD): A RCRA term referring to the treatment, storage, or disposal of hazardous waste. Under RCRA, TSD activity can occur only at units which received or stored hazardous waste after November 19, 1980, the effective date of the RCRA regulations. The effective date for mixed waste is August 19, 1987, and the effective date for State-only dangerous waste is March 10, 1982.

Curie (Ci): The basic unit used to describe the intensity of radioactivity. A curie is equal ~~disintegrations~~ to 37 billion disintegrations per second.

Low-Level Waste (LLW): Radioactive waste that is not high-level radioactive waste, spent nuclear fuel, transuranic waste, byproduct material, or naturally occurring radioactive material. Typically contains small amounts of radioactivity in large volumes, and most can be handled without protective shielding. Solid low-level waste consists of trash such as clothing, tools, and glassware. Liquid waste consists primarily of water circulated as cooling water.

pH: A measure of acidity ~~and~~ or alkalinity. A pH of 7 is neutral, with lower numbers being acidic and higher numbers being alkaline.

~~Solid Waste (radioactive): Either solid radioactive material or solid objects that contain radioactive material or bear radioactive surface contamination.~~

21. Change Appendix title and headers to more closely align with content. Update Web link to Appendix D

Appendix D, Work Schedule

Page D-1 content:

Table D. Major and Interim Milestones and Target Dates

APPENDIX D

WORK SCHEDULE

MILESTONES INCLUDING DESIGNATION OF LEAD REGULATORY AGENCY

~~Listing of Currently Identified Interim and Major~~

~~Milestones and Target Dates~~

NOTES:

Major Milestones are indicated by a -00 suffix (example, M-21-00).

Interim Milestones are indicated by a suffix greater than zero (example, M-22-02). A target date is indicated by a "T" (example, M-21-02-T01). See Section 2.0 of this Action Plan for more details.

Milestones and target dates which are completed, or have been deleted by an approved Tri-Party Agreement change request, are not displayed in Appendix D and have been archived.

Current as of the printing date. For the most current version of Appendix D go to: ~~<http://www.hanford.gov/hanford/files/tpa/agreement-6/ap-App-D.pdf>~~
<http://www.hanford.gov/files.cfm/ap-App-D.pdf>

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Headers on all other pages:

~~Table D. Major and Interim Milestones and Target Dates~~
Appendix D. Milestones Including Designation of Lead
Regulatory Agency

