Inter-Agency Management Integration Team Meeting Minutes
February 20, 2020

Tri-Party Agreement

U.S. Department of Energy
Washington State Department of Ecology
U.S. Environmental Protection Agency

SIGNATURES:

Approval: _____ Date: 6/3/2020
W.F. Hamel, DOE-RL IAMIT Representative

Approval: Robert G. Hastings Digitally signed by Robert G. Hastings Date: 2020.06.02 13:59:31 -07'00' Date: _____
R.G. Hastings, DOE-ORP IAMIT Representative

Approval: Smith, Alex (ECY) Digitally signed by Smith, Alex (ECY) Date: 2020.06.08 08:53:38 -07'00' Date: _____
A.K. Smith, Ecology IAMIT Representative

Approval: DAVID EINAN Digitally signed by DAVID EINAN Date: 2020.06.29 17:00:36 -07'00' Date: _____
D.R. Einan, EPA IAMIT Representative

1.0 WELCOME AND LOGISTICS/FORMAT

The Inter-Agency Management Integration Team (IAMIT) meetings are normally held monthly between the U.S. Department of Energy (DOE), Washington State Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA); also referred to as the Parties.

Mission Support Alliance, LLC (MSA) welcomed the IAMIT members and explained this was a standard IAMIT meeting that would cover the agenda items and action tracking table provided in the handout (see attachments).

2.0 REVIEW IAMIT ACTION TRACKING TABLE

2.1 Action Items

2.1.1 Baseline Risk Assessment for Waste Management Area-C

Ecology stated the latest draft IAMIT Determinations for Groundwater Ingestion and Food Chain Pathway were being shared between DOE and Ecology. Ecology indicated the Food Chain Pathway was just provided to DOE for review. Once DOE has reviewed it, Ecology will share it with EPA. Ecology also noted they were still working on the latest version of the Groundwater Ingestion IAMIT Determination and will provide it to DOE for review soon.

2.1.2 Tri-Party Agreement Dispute (IAMIT Level) Milestone M-015-93C/TPA Change Control Form M-15-18-03 – "Initiate Characterization Field Work for 200-SW-2 OU Landfills"

At the December 19, 2019 IAMIT, Ecology suggested coordinating or extending milestone M-015-93C to coincide with the M-091 milestone for retrievals. DOE took the action to analyze Ecology's proposal and schedule a meeting to discuss it further. DOE plans to meet with the DOE Carlsbad Field Office/Waste Isolation Pilot Plant (WIPP) on February 26, 2020 to discuss shipments and certification of waste. DOE indicated the intent of the meeting with WIPP is to look at their schedule and production rate so DOE can plan accordingly.

2.1.3 Possible Adoption of the Principles and Parameters in Regulatory Documents

Ecology stated they would like to meet again and proposed to the Parties another meeting with the working group be scheduled. The Parties agreed and MSA took the action to schedule the second meeting.

2.1.4 Changes/Updates to TPA Paragraphs 148/149

DOE indicated they made some additional minor changes to the draft Agreement in Principle (AIP) and needed to provide a copy to EPA and Ecology for review. MSA took the action to send the latest draft AIP back out to EPA and Ecology for review.

2.1.5 Gaps in Deactivation, Decommissioning, Decontamination and Demolition (D4) Planning

At the January 23, 2020 IAMIT meeting, DOE took the action to brief EPA and Ecology at the March 19, 2020 IAMIT. The briefing will address lifecycle soil usage versus D4 versus time. This briefing will coincide with the Representative Analogous Waste Site Coordinating Agency Liaisons (RASCAL) Team briefing noted in Section 2.2.2 below. This item will be tracked at the IAMIT level in the interim.

2.2 Status Updates

2.2.1 Draft Agreement in Principle: Revising and Updating TPA Appendices H and I

At the October 17, 2019 IAMIT, the Parties agreed revisions to Appendices H and I would be placed on hold pending the C-106 dispute currently with the Pollution Control Hearings Board and potential path forward determined from the Hanford tank waste mission holistic discussions. DOE proposed to continue tracking until discussions conclude.

2.2.2 Agreement in Principle: TPA Changes in Response to Federal Fiscal Year 2018 and 2019 Budgets

At the November 21, 2019 IAMIT, the Parties agreed this draft AIP should be placed on hold pending results of the "Representative Analogous Waste Site Coordinating Agency Liaisons (RASCAL)" team briefing and path forward, anticipated to be briefed to the IAMIT in March 2020. This item will be tracked at the IAMIT level in the interim.

2.2.3 Modifications to Tri-Party Agreement Section 9.4, Administrative Record (AR) to Eliminate Hard Copy Requirements

DOE noted the proposed changes to Section 9.4 have some nexus into the M-035-09K dispute. Therefore, DOE suggested and the Parties agreed this item should be placed on hold pending the M-035-09K dispute currently with the Pollution Control Hearings Board. This item will be tracked at the IAMIT level in the interim.

3.0 UPCOMING TOPICS/ACTION ITEMS FOR FUTURE IAMIT MEETINGS

Audio Files of TPA Meetings Provided to Ecology

Ecology requested copies of the audio recordings used as a resource during the TPA meetings, specifically the IAMIT, Quarterly Milestone Review and Monthly Project Manager meetings, to produce the required meeting minutes. DOE asked what the purpose of the request was. Ecology responded they would like to have a copy of the audio files used for the meeting minutes or as an alternative, Ecology will make their own audio recording of the meetings. DOE expressed concern about the audio files being electronic, being shared, and/or being released. Ecology stated the audio files give DOE an unfair advantage in the ongoing disputes and

litigation between the agencies. The Parties agreed that the audio files would be deleted once the meeting minutes are approved. Ecology suggested this agreement be documented in an IAMIT Determination, approved by the Parties. The Parties agreed to the IAMIT Determination and MSA took the action to draft the IAMIT Determination for the Parties review.

4.0 REVIEW OF TODAY'S ACTIONS/UPCOMING IAMIT MEETINGS

The following actions were captured during the meeting and provided to the Parties following this IAMIT meeting:

No.	IAMIT Topic	Actions from 2/20/20 IAMIT Meeting
1	Baseline Risk Assessment for WMA-C IAMIT Determinations	Ecology indicated the Food Chain Pathway IAMIT Determination was provided to DOE for review. Once DOE has reviewed it, Ecology will share it with EPA. Ecology is still working on the latest version of the Groundwater Ingestion IAMIT Determination and will be providing it to DOE for review.
2	Tri-Party Agreement Dispute (IAMIT Level) Milestone M-015-93C/TPA Change Control Form M-15-18-03 – "Initiate Characterization Field Work for 200-SW-2 OU Landfills"	DOE took the action to analyze Ecology's proposal for milestone M-091 and schedule a meeting to discuss it further after their meeting with WIPP.
3	Possible Adoption of the Principles and Parameters in Regulatory Documents	MSA took the action to schedule the second meeting.
4	Changes/Updates to TPA Paragraphs 148/149	MSA took the action to send the latest draft AIP, with DOE's comments back out to EPA and Ecology for review.
5	Audio Files of TPA Meetings Provided to Ecology	MSA took the action to draft the IAMIT Determination for deletion of the TPA meeting audio files after meeting minutes are signed/approved.

The next IAMIT meeting is scheduled for March 19, 2020.

Tri-Party Agreement

U.S. Department of Energy
Washington State Department of Ecology
U.S. Environmental Protection Agency

Inter-Agency Management Integration Team Meeting
Thursday February 20, 2020, 8-9 a.m.

Department of Ecology, 3100 Port of Benton Blvd, Conference Room 3 A/B, Richland, WA

Agenda

No	Time	Lead / Org	Topic
1	8:00 – 8:02 a.m.	Michael Turner, MSA	**Welcome and Meeting Logistics/Format**
2	8:02 – 8:30 a.m.	Michael Turner, MSA/ IAMIT and attendees	**Review IAMIT Action Tracking Table**
3	8:30 – 8:50 a.m.	John Price, Ecology	**Audio Files of TPA Meetings Provided to Ecology**
4	8:50-8:55 a.m.	IAMIT Members	**Upcoming Topics for the IAMIT**
5	8:55 – 9:00 a.m.	Michael Turner, MSA/ IAMIT members	**Review of Today's Actions**
6	9:00 a.m.	**Adjourn**	

Inter-Agency Management Integration Team Decision Table/Action Tracking

February 20, 2020

Table I. Action Items[1]

1. Baseline Risk Assessment for WMA-C

Reference: Phase II RCRA Facility Investigation for Waste Management Area C (RPP-RPT-58339)

Affected Milestone: M-045-61 (completed)/TPA Appendix I

Originated: 02/21/19

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to agree on the path forward/resolution for four specific areas of the Baseline Risk Assessment: Judgmental Samples; Hazards Index; Groundwater Ingestion and Food Chain Pathway

Comments: Presentations were given by Ecology and DOE at the 02/21/19 IAMIT. At that meeting, Ecology requested more time to consider the issue. There was no change in status at the 3/21/19 IAMIT. The IAMIT met on 05/08/19 to attempt resolution on 4 issues. Two of four (Judgmental Samples and Hazard Index) were resolved and IAMIT Determinations have been drafted and are with the IAMIT for review. The two remaining issues (Groundwater Ingestion and Food Chain Pathway) are being discussed internally by Ecology and await resolution. There were other broader issues discussed regarding future land use and the possible formal adoption of the Inner Areas Principles to apply to tank farm cleanup that are up for future discussion by the IAMIT. IAMIT is still tasked with resolving the remaining two issues (Groundwater Ingestion and Food Chain Pathway). The parties must also determine whether the Baseline Risk Assessment is a TPA Primary or Secondary Document. At the 07/18/19 IAMIT, the parties agreed to a "core" IAMIT meeting to discuss the Groundwater Ingestion and Food Chain Pathway further. MSA took the action to schedule the meeting. Parties have yet to agree to a date. Ecology noted their staff was reviewing the Judgmental Samples and Hazard Index IAMIT Determinations. At the 08/15/19 IAMIT, Ecology stated that they were still reviewing the draft IAMIT Determinations for Judgmental Samples and Hazard Indices. At the 10/17/19 IAMIT, Ecology committed to reviewing the language in the Hazard Index IAMIT Determination (#2019-005) and Judgmental Samples IAMIT Determination (#2019-006) for the BRA WMA-C by the November 2019 IAMIT meeting. Ecology also committed to scheduling an internal meeting with Ecology staff to discuss the two remaining issues (Groundwater Ingestion and Food Chain Pathway) and then talk about the outcome with the November IAMIT. A "stand-alone" IAMIT meeting to discuss the Groundwater Ingestion and Food Chain Pathway issues is scheduled for 11/21/19. At the 11/21/19 stand-alone IAMIT meeting on this subject, the parties agreed to sign IAMIT Determinations on Judgmental Samples and Hazard Index (signed 11/25/19). The two remaining issues - Groundwater Ingestion and Food Chain Pathway remain open, though ORP has drafted IAMIT Determinations on these issues, which are in review by the parties. On 12/19/19, draft versions of the two IAMIT Determinations were exchanged between the parties. On 12/20/19, Ecology asked for a meeting to discuss. At the 1/23/20 IAMIT, the Parties stated they had met, have exchanged drafts and are close to agreement on remaining two IAMIT Determinations. Ecology currently reviewing the latest versions.

Closed: *Partial closure*: Hazard Index IAMIT Determination (#2019-005) and Judgmental Samples IAMIT Determination (#2019-006) were signed 11/25/19.

[1] *New information shown in blue.

2. Tri-Party Agreement Dispute (IAMIT Level) Milestone M-015-93C / TPA Change Control Form M-15-18-03 – "Initiate Characterization Field Work for 200-SW-2 OU Landfills"

Reference: Letter: 18-NWP-096; Statement of Dispute: AR-01073 (letter 19-SGD-0008)

Affected Milestone: M-015-93C

Originated: Dispute initiated at the Project Manager level 7/09/18. Elevated to the IAMIT level on 03/14/19.

Status: Open

Dispute Extended: The Parties had until 04/30/19 to resolve dispute at the IAMIT level (latest extension signed on 04/04/19). On 05/16/19, the Parties agreed not to issue the Director's Determination extension and work resolution via the budget AIP and TA.

Action: Parties are being asked to resolve dispute at the IAMIT level or send to Ecology Director for Director's Determination.

Comments: At the 4/24/19 IAMIT meeting, Ecology noted that the TPA-prescribed due date for a Final (Director's) Determination may have lapsed and proposed extending the dispute at the IAMIT level. DOE took the action to set up a meeting to discuss Federal Fiscal Years 2018, 2019 budgets. DOE-RL stated that this milestone is now different from the other milestones in the Agreement in Principle (AIP) and Tentative Agreement (TA) and needs to be addressed separately (Ecology elevated it from the PM level to the IAMIT level). On 05/16/19, the Parties agreed not to issue the Director's Determination extension and work resolution via the budget AIP and TA. A draft AIP and TA which includes M-015-93C, is in review by the Parties. If signed, the AIP and TA including M-015-93C would resolve this dispute. On 07/03/19 Ecology noted it would not sign the AIP until it received a response to its letter of 07/10/19 (19-NWP-109). At the 08/15/19 IAMIT meeting, Ecology stated that the AIP remains on hold until it gets a reply to its 07/10/19 letter. DOE said it was still coordinating its response with DOE Headquarters. EPA also requested to see the DOE response when issued. On 09/09/19, DOE-RL requested Ecology's reconsideration in approving the AIP to begin negotiating the milestones impacted by the FFY 2018 and 2019 budget via letter 19-AMRP-0074. At the 11/21/19 IAMIT, Ecology noted they have requested a briefing from DOE on the FY20 Continuing Resolution (CR) impacts (in accordance with TPA Legal Agreement, paragraph 149.F). DOE reported they have scheduled the FY19 year-end accomplishments briefing and then will schedule an Integrated Priorities List follow-on briefing which will include FY20 CR impacts. At the 12/19/19 IAMIT, Ecology suggested coordinating milestone M-015-93C (Characterize field work for 200-SW-2 Operable Unit) with the M-091 milestone for retrievals. DOE is currently evaluating options, including scheduling a meeting with Ecology to discuss. The agencies have agreed to remove this milestone from the budget AIP.

Closed: —

3. Possible Adoption of the Principles and Parameters in Regulatory Documents

Reference: DOE/RL-2004-60, REV.1

Affected Milestone: N/A

Originated: 05/16/19

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to consider adopting the Principles and Parameters for use as a standard in producing regulatory documents.

Comments: IAMIT has agreed to discuss this topic as a "core" IAMIT meeting. No meeting date set. On 6/20/19, Ecology stated they needed to discuss this internally and discuss and would report status at the 07/18/19 IAMIT meeting. At the 07/18/19 IAMIT meeting the parties agreed to refer to this topic as the "Principles and Parameters" and the parties agreed to add this topic to a future regularly scheduled IAMIT meeting to discuss further. At the 08/15/19 IAMIT meeting, the parties agreed to address this issue in a stand-alone, topic-specific IAMIT meeting. MSA took the action to schedule that meeting. Parties have yet to agree on a date for this meeting. At the 10/17/19 IAMIT, the agreed to discuss this subject and path forward at the November IAMIT. The parties also discussed the possibility of assembling a small group to evaluate the principles and parameters and then bring a recommendation back to the IAMIT. At the 11/21/19 IAMIT, the parties agreed to form a small working group, made of up of each agency's subject matter experts to discuss and eventually bring their conclusions to the IAMIT. At the 12/19/19 IAMIT, the agencies were asked to identify SME's to form a small working group. Agencies have identified SME's, the team will consist of:

- Craig Cameron, EPA
- John Price, ECY
- Doug Hildebrand, RL
- Rod Lobos, ORP

First meeting of the group occurred 01/23/20. Affected milestones and work plans were discussed as well as a potential IAMIT Determination to document conclusions.

Closed: —

4. Changes/Updates to TPA Paragraphs 148/149

Reference: Tri-Party Agreement Legal Agreement, paragraphs 148, 149

Affected Milestone: N/A

Originated: 05/16/19

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to revise and update TPA paragraphs 148/149 (see also "Status Updates, item #1 below).

Comments: IAMIT has agreed to discuss this update and potentially change the TPA Legal Agreement. The parties have been discussing potential changes for a number of years. History and background have been provided. IAMIT is being asked to meet as a "core" team to discuss changes and eventually recommend to the Executive Managers signing a TPA Change Control Form to document those changes. Meeting was held on 06/27/19, with the parties' subject matter experts and legal teams to discuss the history and rationale for proposed changes. DOE is reviewing paragraphs 148/149 to look at simplifying the proposed changes and will provide to regulators for review. At the 07/18/19 IAMIT, the parties agreed that a kick-off meeting should be scheduled to sign the AIP and start negotiations. At the 08/15/19 IAMIT meeting, MSA agreed to work with DOE to schedule a kick-off meeting. Parties have yet to agree to a date for the meeting. On 09/09/19, DOE-RL provided to Ecology via letter 19-AMRP-0074, a timeline of efforts made to update the language in 148 and 149 and offered to schedule joint meetings to accomplish this task. At the 10/17/19 IAMIT, DOE noted they would not take further action at this time without further discussion and buy in from the parties to perform a meaningful exercise to revise paragraphs 148 and 149. DOE stated they are committed to following federal law and the TPA and will continue to do so whether these paragraphs are revised or not. At the 11/21/19 IAMIT, the parties agreed an update to reflect current mechanisms of the federal budgeting process is needed and to perform this update via TPA negotiations. MSA took the action to draft an Agreement in Principle (AIP). That AIP would set a March 31, 2020 date for completing negotiations. The parties also expressed the need for their respective lawyers to be included in negotiations. At the 12/19/19 IAMIT, DOE-RL noted they were reviewing the draft AIP. The draft AIP was provided to the regulators for review with comments requested by COB 01/22/2020. EPA and Ecology comments were received on 01/23/20, DOE is currently reviewing the AIP.

Closed: —

5. Gaps in Deactivation, Decommissioning, Decontamination and Demolition (D4) Planning

Reference: ECY letter NWP-20-201 and DOE letter 20-PFD-0013

Affected Milestone: N/A

Originated: 01/23/20 IAMIT

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to evaluate DOE's proposed lifecycle soil usage versus D4 versus time.

Comments: Correspondence on "Gaps in Planning Deactivation, Decommissioning, Decontamination and Demolition Projects" was added at the 1/23/20 IAMIT. DOE took the action to brief EPA and ECY at the March IAMIT (to be timed with the RASCAL Team briefing). This will address lifecycle soil usage versus D4 versus time.

Closed: —

Table II. Status Updates

1. Draft Agreement in Principle: Revising and Updating TPA Appendices H and I

Reference: Tri-Party Agreement Action Plan, Appendices H and I

Affected Milestone: M-042-00 and M-045-00 series

Originated: 05/16/19

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to review the draft TPA Agreement in Principle for entering into formal negotiations to revise and update TPA Appendices H and I.

Comments: The parties agree that TPA appendices H and I are outdated and in need of change. Though attempts have been made and proposals for changing have been shared by the parties, no change has occurred. In light of the current 241-C-106 Waiver Request Denial Dispute, the parties are agreeing to enter formal TPA negotiations. At the 6/20/19 IAMIT, the Parties agreed to schedule a kick-off meeting and share the draft AIP, meeting has yet to be scheduled. At the 07/18/19 IAMIT, the parties agreed that an AIP was necessary to enter into negotiations for updates to Appendices H & I in a two-phased approach, first being the easy updates and then proceed to the more challenging updates. The parties also agreed to add TPA section 11.8 (ORP Critical Path) as part of these negotiations. At the 08/15/19 IAMIT, MSA took the action to revise the draft Appendix H, I AIP to include TPA section 11.8. Ecology noted that the TPA dispute over retrieval criteria for SST 241-C-106, currently before the Washington State Pollution Control Hearings Board could delay discussions. At the 10/17/19 IAMIT, the parties agreed revisions to Appendices H and I should be placed on hold pending the path forward determined from the Hanford tank waste mission "holistic" discussions. At the 01/23/20 IAMIT there was no change in status.

Closed: —

2. Agreement in Principle for the Negotiation of HFFACO Revisions in Response to Federal Fiscal Year (FFY) 2018 Appropriation and FFY 2019 President's Budget

Reference: N/A

Affected Milestone: M-015-84, M-015-91B, M-015-92C, M-015-93B, , M-015-98, M-015-99, M-015-112, M-016-255, M-016-256, M-085-70 (currently in dispute at the PM level), M-085-80

Originated: 12/20/18

Status: Open - Agreement in Principle (AIP) and corresponding Tentative Agreement (TA) has been drafted

Dispute Extended: N/A

Action: Sign Agreement in Principle, enter into negotiations

Comments: These negotiations are driven primarily by requirements found in HFFACO, Legal Agreement, Paragraph 148.A, which requires DOE-RL to include in its annual budget request to the DOE Office of Environmental Management (DOE-EM) estimated funding levels required to achieve full compliance with HFFACO milestones. The FFY 2018 appropriation by Congress and the FFY 2019 President's budget request to Congress, respectively, were less than the DOE-RL estimated funding levels submitted to DOE-EM. HFFACO, Legal Agreement, Paragraph 149.G allows DOE-RL to propose changes to milestones in response to congressional budget appropriations that are less than estimated funding levels required to achieve full compliance. HFFACO, Legal Agreement, Paragraph 149.D states that DOE-RL shall assess the impacts of the President's budget on DOE-RL's ability to complete milestones on time. At the 12/20/18 IAMIT meeting, Ecology stated they had received drafts of the AIP and TA on 12/19/18, were scheduled to meet with their attorneys to review them, and will respond back to DOE. At the 01/31/19 IAMIT, Ecology stated EPA had been on furlough and needed to restart these discussions. At the 2/21/19 IAMIT, the Parties were asked for an update on status. There was no change in status. At the 3/21/19 IAMIT, Ecology stated that both Ecology and EPA were discussing the language in the AIP and TA and will send to DOE. Action is with Ecology and EPA to provide comments. Ecology questioned the language in the AIP/TA and sent it to EPA for their review. At the 04/24/19 IAMIT, DOE-RL took the action to schedule a teleconference between the Tri-Parties to discuss current status and path forward to negotiations. (See also item above regarding M-015-93C.) On 05/06/19, DOE received the AIP from EPA and is currently reviewing it for approval. At the 06/20/19 IAMIT, the parties discussed expectations for the AIP. Ecology stated there is a letter going to DOE regarding budget that was currently in review with Ecology legal. On 07/03/19 Ecology noted it would not sign AIP until it received a response to its letter of 07/10/19 (19-NWP-109). DOE requested an extension to 08/02/19 to respond to the letter. At the 08/15/19 IAMIT meeting, Ecology stated that the AIP remains on hold until it gets a reply to its 07/10/19 letter. DOE said it was still coordinating its response with DOE Headquarters. EPA also requested to see the DOE response when issued. As of 09/09/19, DOE-RL requested Ecology's reconsideration of approving the AIP to begin negotiating the milestones impacted by the FFY 2018 and 2019 budget via letter 19-AMRP-0074. At the 10/17/19 IAMIT Ecology stated they wanted to resolve the issues with TPA Paragraphs 148/149 before signing an AIP. DOE disagreed, saying the issues were separate. At the 11/21/19 IAMIT, the parties agreed that the "Representative Analogous Site Coordinating Agency Liaisons (RASCAL)" team* conclusions might provide a resolution to this issue. The RASCAL team, comprised of all three agencies is currently evaluating a proposal, which will ensure consistent remedies for similar conceptual site model groups and associated waste sites, and could potentially reduce characterization pre-ROD and post-ROD. Those conclusions are expected to be briefed to the IAMIT in March 2020.

* See 11/21/19 IAMIT meeting minutes for RASCAL team presentation.

Closed: —

3. Modifications to TPA Section 9.4, "Administrative Record," to Eliminate Hard Copy Requirements

Reference: TPA Section 9.4

Affected Milestone: N/A

Originated: 11/15/18 (re-opened)

Status: Open - Change Control Form P-09-18-01 has been drafted.

Dispute Extended: N/A

Action: Sign Change Control Form

Comments: Change Control Form in draft, proposes eliminating the requirement to maintain hard-copy files in the Hanford Administrative Record (AR). DOE upgraded the Administrative Record website to enhance search and retrieval capabilities, allow multi-field filtering, provide canned and ad hoc reporting, enable electronic document submittal, and improve system response time. At the December 20, 2018 IAMIT meeting, Ecology indicated they would be ready to sign this change control form when the AR upgrade is complete. The system upgrade was completed in June 2019. At the 07/18/19 IAMIT meeting, Ecology stated they wanted a "validation and verification" meeting to assess the AR upgrades. On 8/28/19, a validation meeting was held. Ecology took the action to propose a new TPA Change Control Form or make changes to the existing (P-09-18-01). On 9/03/19, Ecology stated they would like DOE to prepare AR indexes at regular intervals and will draft a CCF with proposed language to modify Section 9 of the TPA and provide to DOE/EPA for review. Ecology also requested additional functionality in the AR for replicating the RCRA Permit at any given point in time. At the 10/17/19 IAMIT, is was noted this action is currently with Ecology to draft the change control form with the proposed modifications to Section 9 of the TPA, to include the Administrative Record indices Ecology has requested from DOE. At the 11/21/19 IAMIT, Ecology noted the progress made on the AR upgrade, but still had concerns about documents being removed from the AR and a lack of procedure for doing so. At the 12/12/19 IAMIT, Ecology took the action to discuss what they propose at the 01/23/20 IAMIT – including draft changes to the TPA. On 01/28/20, Ecology sent the draft TPA Change Control Form to the Parties for review.

Closed: —

Table III. Recently Closed/Other Agreements

None.

Tri-Party Agreement

TPA Interagency Management Integration Team Meeting

February 20, 2020

Name	Organization
John Price	Ecology
Bill Hamel	DOE-RL
Kathy Higgins	DOE-RL
Rob Hastings	DOE-ORP
Rod Lobos	DOE-ORP
Stephanie Brosher	MSA
Michael Turner	MSA
Scott Davis	MSA
Dave Einan	EPA
Kim Welsch	Ecology
Mike Cline	DOE-RL