

**HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER  
INTERAGENCY MANAGEMENT INTEGRATION TEAM (IAMIT)  
DETERMINATION Number: 2019-007**

This form is intended to document the decisions and determinations made by the IAMIT within their authorities under the terms and conditions of the Hanford Federal Facility Agreement and Consent Order. This form is also intended to provide notification, to the affected persons, of the IAMITs decisions / determinations or actions assigned.

**SUBJECT:** Baseline Risk Assessment (BRA) for Waste Management Area C (WMA C) – Groundwater

**DETERMINATION:**

On June 18, 2020, the U.S. Department of Energy (DOE), U.S. Environmental Protection Agency (EPA), and Washington State Department of Ecology (Ecology) agreed to the following:

- Multiple Ecology comments on the WMA C BRA concerned groundwater: BRA 1-1, 3-7, 3-8, 3-10, 3-11, 3-13, 3-14, 3-16, 3-38, 3-42, 3-47, and 5-1. HFFACO Appendix I (Section 1.0) states that one purpose of Appendix I is that “Groundwater Investigations conducted under past practice authority will be coordinated with any investigations that may be conducted as part of the SST corrective action/closure process.”
- Ecology is the lead regulatory agency for the 200-BP-5 operable unit (OU), underlying WMA C,
- Currently a CERCLA interim action has been proposed for the 200-PO-1/200-BP-5 OUs,
- DOE, Ecology and EPA may coordinate the groundwater-related comments on the WMA C BRA with a future final remedial action for these OUs,
- Ecology will make a future permitting decision for WMA C, that incorporates the closure plans (Tier 2 and 3) for WMA C into the Hanford RCRA permit,
- Through that permitting action, Ecology will establish both closure performance standards and compliance monitoring requirements. Detection Monitoring for dangerous constituents will be established in the permit – assessment monitoring is required only if detection monitoring finds dangerous constituents above action limits,

(Continued on page 2)

**IS THIS DECISION / DETERMINATION / ACTION ITEM**

FINAL       INTERIM (Further action to be taken)

**IAMIT MEMBER APPROVALS**

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W.F. Hamel, DOE-RL

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Date

\_\_\_\_\_  
R.G. Hastings, DOE-ORP

\_\_\_\_\_  
Date

\_\_\_\_\_  
D.R. Einan, EPA

\_\_\_\_\_  
Date

\_\_\_\_\_  
A.K. Smith, Ecology

\_\_\_\_\_  
Date

**IAMIT Determination 2019-007, Baseline Risk Assessment (BRA) for  
Waste Management Area C (WMA C) – Groundwater**

**DETERMINATION (continued):**

- Further, Ecology as the lead regulatory agency for the 200-BP-5 OU, will ensure that final actions for groundwater will be documented in a Record of Decision. Performance monitoring to confirm that the cleanup action has attained cleanup standards will also be documented in the Remedial Design/Remedial Action Work Plan for the 200-BP-5 OU,
- DOE is preparing a Cumulative Impact Evaluation (CIE) for the Hanford Central Plateau. Ecology and EPA may use the CIE results to inform their future regulatory decisions, and can at the same time consider the Ecology groundwater-related comments on the WMA C BRA, and
- The Ecology comments listed above are deemed closed with no further revisions to this part of the WMA C BRA.