

Inter-Agency Management Integration Team (IAMIT) Meeting Minutes

Department of Ecology Building
Richland, Washington

May 16, 2019

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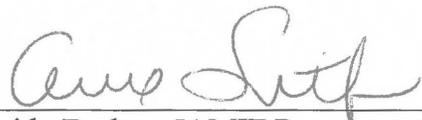
Tri-Party Agreement

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

SIGNATURES:

Approval:  Date: 7/9/2019
W.F. Hamel, DOE-RL IAMIT Representative

Approval:  Date: 7/16/19
R.G. Hastings, DOE-ORP IAMIT Representative

Approval:  Date: 7/18/19
A.K. Smith, Ecology IAMIT Representative

Approval:  Date: 7/23/19
D.R. Einan, EPA IAMIT Representative

1.0 WELCOME AND LOGISTICS/FORMAT

Mission Support Alliance, LLC (MSA) welcomed the Inter-Agency Management Integration Team (IAMIT) members, and explained this standard IAMIT meeting would cover action tracking tables, etc., and that a special IAMIT meeting would follow, in which the Tri-Party Agreement (TPA) agencies would discuss groundwater recharge rate sensitivity analysis and polychlorinated biphenyl (PCB) analysis methods.

2.0 ACTION TRACKING TABLES

2.1 Action Items

2.1.1 Sensitivity Analysis on Groundwater Recharge Rates for the 200-EA-1 Operable Unit

The IAMIT deferred discussing groundwater recharge rate sensitivity analysis until the special topic IAMIT meeting scheduled to immediately follow this regularly scheduled IAMIT meeting.

2.1.2 Polychlorinated Biphenyl Analysis Methods

The IAMIT deferred discussing PCB analysis methods until the special topic IAMIT meeting scheduled to immediately follow this regularly scheduled IAMIT meeting.

2.1.3 Baseline Risk Assessment for Waste Management Area C

MSA explained that the IAMIT had a productive meeting on May 8, 2019, during which the agencies tentatively reached agreement on two of four Waste Management Area (WMA) C issues – judgmental samples and hazard index. The Washington State Department of Ecology (Ecology) is still discussing the groundwater ingestion and food chain pathway issues internally. The agencies discussed adoption of the inner area principles. Ecology will review the principles in more detail before engaging in further discussion on the subject. The parties agreed that further discussions on the inner area principles should be held with only the core IAMIT team members to prevent expending staff time unnecessarily. MSA took the action to schedule special topic IAMIT meetings for continued discussion on (1) groundwater ingestion and food chain pathway, and (2) the feasibility of adopting the inner area principles. When resolved, the agencies will prepare an IAMIT determination for each of the WMA C issues.

2.1.4 Tri-Party Agreement Dispute 241-C-106 Denial of Waiver Request

MSA explained that the IAMIT met and discussed this dispute on May 6, 2019. The dispute has been extended at the IAMIT level until June 12, 2019, and, if the agencies conclude they are unable to resolve the issue, a final determination is due from Ecology's director 2 weeks later. Ecology sent MSA its proposal for resolving the dispute today, May 16, 2019, which MSA

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forwarded to IAMIT members. The U.S. Department of Energy (DOE) is meeting to discuss Ecology's proposal internally. MSA took the action to follow up with DOE next week, after which an IAMIT meeting will be scheduled.

MSA explained that during the May 6 meeting, the parties also discussed updating TPA Action Plan Appendices H and I. Ecology explained that changes to Appendices H and I were addressed in Ecology's proposal, and stated that if the agencies intend to enter into negotiations to update the appendices, the parties should sign an agreement in principle (AIP).

DOE explained that Ecology is tying updates to Appendices H and I to their proposal for resolving the 241-C-106 dispute, and that DOE does not necessarily agree that the two should be tied together. Ecology indicated that the issues could be separated, and explained that the 241-C-106 dispute could be resolved by making an IAMIT agreement to negotiate changes to Appendices H and I. DOE stated agreement that the appendices needed to be updated and the dispute needed to be resolved, and reiterated that they would internally review and discuss Ecology's proposal. Ecology explained that it is difficult to demarcate an end to the (241-C-106) dispute because Ecology is not asking DOE to do anything and not stopping DOE from doing anything. Ecology again explained that the parties could agree to settle the dispute by entering into negotiations to update Appendices H and I, which will help the parties in the future.

2.1.5 Tri-Party Agreement Dispute Milestone M-015-93C

Ecology explained that the U.S. Environmental Protection Agency (EPA) and Ecology sent a markup of the AIP (for negotiations in response to the federal fiscal year 2018 appropriations and 2019 president's budget) to DOE. DOE acknowledged receiving the markup, and noted that the dispute extension has expired. Ecology suggested extending the dispute until the AIP is signed. DOE questioned why the dispute needed to be extended, because nothing will happen if a director's determination fails to materialize. MSA asked for clarification on the milestone's status. DOE asked if the agencies needed to change the TPA dispute timeframes. DOE stated that the parties should focus on the AIP not the dispute, and that extending the dispute would only give credence to it. EPA explained that the purpose of a dispute is to provide DOE coverage against enforcement actions. DOE acknowledged procedural vulnerability, and stated that Ecology would not be penalized for failing to take action. Ecology explained they are exercising their enforcement discretion, and that it does no harm to DOE. Ecology indicated they do not believe the TPA requires Ecology to issue a director's determination. DOE explained there is no penalty for Ecology not taking action, whereas DOE is penalized if it fails to take certain actions. Ecology explained that this issue is a result of the agencies not updating TPA Legal Agreement paragraphs 148 and 149 last October, which was complicated by the government shutdown. Ecology concurred with DOE's approach to not extend the milestone and instead focus on finalizing the AIP. MSA asked how best to document this decision for future reference, and Ecology stated to simply indicate Ecology has elected not to issue a director's determination at this time, pending finalization of the AIP. DOE is reviewing the AIP markup. When the agreement is reached, subject milestones will be placed in abeyance. The parties may choose to make changes to the dispute resolution timelines/process in the future.

2.2 Status Updates

2.2.1 Tri-Party Agreement Five-Year Review

MSA explained that EPA was working on comments for TPA Legal Agreement paragraphs 148 and 149 at the last IAMIT, and that EPA had stated a preference to change neither the structure nor the intent of the paragraphs, just the content. EPA explained that, based on the earlier discussion and the May 15, 2019, cleanup priorities public meeting, more wholesale changes may be appropriate. Ecology described having requested DOE to walk them through the proposed changes and rationale, because much of the institutional knowledge of the changes' intent had been lost. DOE took an action to schedule an informal meeting with Ecology, EPA, and DOE staff who may have the institutional knowledge. Ecology explained that they would like to understand the DOE's intent with the proposed changes, because like EPA, Ecology does not want to change the paragraphs' intent. Instead, Ecology would like to "right size" the language to current practices.

2.2.2 Modifications to Tri-Party Agreement Section 9.4

MSA explained there has been no change in the status of this proposed TPA change to eliminate the hard copy requirement for administrative record files. MSA stated that the new Administrative Record website will be demonstrated to the M-035-09 project managers, the public information officers, and possibly the Hanford Advisory Board (HAB) if the public information officers deem that appropriate.

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

The parties discussed this item under 2.1.5.

2.2.4 M-035-09K, "Conduct biennial assessments of information and data access needs with EPA and Ecology"

Ecology stated that the DOE and Ecology project managers are working on this milestone. Ecology stated that M-035-09K was removed from the TPA when it should not have been, and that DOE had indicated Ecology must send a letter stating that the milestone should be restored. The project managers are scheduled to meet on May 28, 2019.

2.3 Recently Closed Items

MSA explained that during the last IAMIT, the parties agreed that M-037-10 (a.k.a. coordinated closure) could be resolved at the project manager level. Ecology described having presented an overview of coordinated closure to the HAB River and Plateau Committee on May 15, 2019, in preparation for a full HAB presentation. Ecology reported having sent draft changes to the M-037 milestone series to DOE and EPA, but has not received any feedback. Ecology is hoping to present to the full HAB in June, followed by a 45-day public comment period beginning in August. Ecology stated that the TPA agencies are conceptually in agreement to reorder the

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milestones to align with the *Comprehensive Environmental Response, Compensation, and Liability Act* milestones. Ecology stated that they have been processing coordinated closure plans already, and they anticipate having them all complete by September 30.

DOE stated they would discuss internally, and noted that many of the milestones in the package are also in the AIP. DOE expressed concern that some of the milestones had due dates of 270 days after issuance of a record of decision, but some had hard dates, and those dates are moving. Ecology stated they could discuss specific milestones.

3.0 DISCUSSION

The agencies discussed IAMIT meeting schedules. DOE stated that quarterly milestone reviews and IAMIT meetings are both venues for communication, and having them back to back may be redundant. Ecology stated that the meetings serve different purposes. DOE concurred that one (the TPA quarterly milestone reviews) provides more of a status. The parties agreed to schedule the IAMIT meetings from 8 a.m. to 9 a.m. before the quarterly reviews.

4.0 NEW ITEMS FOR UPCOMING IAMIT MEETINGS

MSA asked if there were any emerging issues the IAMIT would like to include on forthcoming meeting agendas. Ecology requested that the M-035-09 project managers brief the IAMIT on the milestone status.

5.0 REVIEW OF TODAY'S ACTIONS/UPCOMING IAMIT MEETINGS

MSA will schedule follow-up meetings on inner area principles and the remaining WMA C issues. The DOE and Ecology M-035-09 project managers will present to the IAMIT. There is a possibility for a core IAMIT meeting related to C-106, and the parties are resetting their discussion on Legal Agreement paragraphs 148 and 149.



TPA Interagency Management Integration Team Meeting

May 16, 2019

<u>Name</u>	<u>Organization</u>
<i>Kathy Higgins</i>	<i>DOE</i>
<i>Michael Cline</i>	<i>DOE</i>
<i>Carolyn Norman</i>	<i>MSA</i>
<i>Beck Daniel</i>	<i>DOE</i>
<i>Dave Einar</i>	<i>EPA</i>
<i>Sara Austin</i>	<i>CHPRC</i>
<i>Scott Davis</i>	<i>MSA-TPA</i>
<i>Alex Smith</i>	<i>Ecology</i>
<i>John Price</i>	<i>Ecology</i>
<i>ROD COBOS</i>	<i>DOE</i>
<i>NINA Menard</i>	<i>ECY</i>
<i>Rob Hastings</i>	<i>DOE</i>
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**Inter-Agency Management Integration Team Meeting
Thursday May 16, 2019, 8-9 a.m.**

Department of Ecology, 3100 Port of Benton Blvd, Conf. Rooms 3A/B, Richland, WA

Agenda

No	Time	POC / Org	Topic
1	8:00 – 8:05 am	Turner, Michael, MSA	Welcome and Meeting Logistics/Format
2	8:05 – 8:35 am	Turner, Michael, MSA (IAMIT and attendees)	IAMIT Action Tracking Table
3	8:35 -8:45 am	Price, John ECY	IAMIT Discussion – IAMIT Meeting Frequency, Locations and Length of Meetings
4	8:45 – 8:50 am	IAMIT Members	New Items for Upcoming IAMIT Meetings
7	8:50 - 9:00 am	Turner, Michael, MSA	Review of Today’s Actions / Upcoming IAMIT Meetings

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*New information shown in blue

Table I. Action Items

1. Sensitivity Analysis on Groundwater Recharge Rates for the 200-EA-1 Operable Unit

Reference: 200-EA-1 Operable Unit Work Plan, Draft A (DOE/RL-2016-58)
Affected Milestones: N/A
Originated: 09/12/2018
Status: Open
Dispute Extended: N/A
Action: Parties are being asked to agree on the path forward/resolution on recharge sensitivity analysis for 200-EA-1 OU.
Comments: Presentations were given by DOE and Ecology staff at the 04/24/19 IAMIT. The IAMIT will meet on 05/16/19 (today) to attempt to resolve this issue.
Closed:

2. Polychlorinated Biphenyl (PCB) – Method Analysis Selection 8082 and 1668A for the 200-EA-1 Operable Unit

Reference: 200-EA-1 Operable Unit Work Plan, Draft A (DOE/RL-2016-58)
Affected Milestones: N/A
Originated: 09/12/2018
Status: Open
Dispute Extended: N/A
Action: Parties are being asked to agree on the path forward/resolution for use of Method 1668 in conjunction with Method 8082 for soil characterization at the 200-EA-1 OU.
Comments: Presentations were given by DOE and Ecology staff at the 04/24/19 IAMIT. The IAMIT will meet on 05/16/19 (today) to attempt to resolve this issue.
Closed:

3. Baseline Risk Assessment for WMA-C

Reference: Phase II RCRA Facility Investigation for Waste Management Area C (RPP-RPT-58339)
Affected Milestones: 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 are being drafted to document their decision. 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.
Closed:

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4. Tri-Party Agreement Dispute (IAMIT Level) 241-C-106 Waste Retrieval Denial of Waiver Request

Reference: Letters: 18-ECD-0555, 19-NWP-012; Statement of Dispute: AR-01075

Affected Milestones: N/A

Originated: Dispute initiated at the Project Manager level on 01/23/19. Elevated to the IAMIT level on 03/21/19.

Status: Open

Dispute Extended: The Parties currently have until 06/12/19 to resolve or extend at the IAMIT level (latest extension signed 05/09/19)

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

Comments: At the 04/24/19 IAMIT, an extension was signed by the IAMIT that provided the Ecology Director until 05/28/19 to issue a Director's Determination (reference AR-01196). The IAMIT met on 05/06/19 to attempt to resolve the dispute, with a verbal proposal provided by Ecology for resolving the dispute. DOE-ORP requested that proposal in writing, and in the interim, the Parties agreed to extend the dispute at the IAMIT level until 06/12/19 and in conjunction, extended the date for issuance of the Director's Determination until two weeks after the IAMIT fails to resolve the dispute. The Parties further agreed to enter into formal negotiations to potentially update TPA Appendices H and I.

5. 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 Milestones: 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)

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

Comments: None

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Table II. Status Updates

1. TPA Five-Year Review

Reference: TPA Article XXXVIII

Affected Milestones: N/A

Originated: N/A

Status: Agency Review – closed (via IAMIT Determination)/TPA update – complete

Dispute Extended: N/A

Action: Parties will meet for close-out meeting and commit to meet regularly (or semi-regularly) on remaining agreed-upon sections targeted for updating (*see below).

Comments: Ten TPA Class II Change Control Forms were signed at the 08/18/17 IAMIT meeting. One Class I Change Control Form was signed at the ECY Director and EPA Regional Administrator level. One Class I Change Control Form was disapproved by EPA.

*Some of the TPA Change Forms initially proposed as part of the TPA update (Paragraphs 148/149, Appendices H and I, and Section 11.8) will not be implemented due to time and available resources. However, the parties have agreed to continue talks on these areas.

Notes: The TPA agencies have determined the changes to the TPA were “not significant” and thereby not subject to public comment. A reprint decision of the TPA has been postponed to late Fall pending changes to the above-mentioned sections of the TPA meeting agreement by the parties. The Parties have committed to continuing talks on other potential changes to the TPA, notably Appendices H, I, Section 11.8 and Paragraphs 148/149.

Pending the outcome of these potential changes, a decision to reprint the TPA will be made. As of 12/14/17 IAMIT, no change in the status, however it was determined that both Ecology and EPA Legal should be involved in the 148/149 discussions and that potential changes to TPA Appendices H and I may be included in the scope of the “System Plan” negotiations. The System Plan negotiations are scheduled to conclude by 04/17/19. A decision to reprint must be made by July 31st to complete by the end of the fiscal year. At the 10/18/18 IAMIT meeting, EPA agreed to take the lead in coordinating a Paragraph 148/149 meeting to discuss EPA’s legal comments with the Parties for resolution. At the 12/20/18 IAMIT meeting, Ecology stated they have been discussing minor changes to Appendix I with ORP.

At the 01/31/19 IAMIT, EPA requested the latest proposed changes to TPA Paragraphs 148/149. EPA agreed to review the draft change control form (L-16-01) and provide a status at the February IAMIT.

At the 03/21/19 IAMIT, the Parties were asked for an update on proposed changes to TPA Paragraphs 148/149. There was no change in status. At the 04/24/19 IAMIT meeting, EPA stated they are still working on providing comments on TPA paragraphs 148/149 and indicated they would like to be doing the same things that are in the TPA, just update them to reflect current terminology.

Closed:

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

Reference: TPA Section 9.4

Affected Milestones: N/A

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

Status: Change Control Form P-09-18-01 has been drafted, is under review with DOE

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. DOE has authorized an Administrative Record system upgrade. This upgrade will enhance search and retrieval capabilities, allow multi-field filtering, provide canned and ad hoc reporting functionality, 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 is planned to be completed during the third quarter of FY2019.

Closed:

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3. 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 Milestones: M-015-84, M-015-91B, M-015-92C, M-015-93B, M-015-93C, M-015-98, M-015-99, M-015-112, M-016-255, M-016-256, M-085-70, M-085-80
Originated: 12/20/18
Status: Agreement in Principle (AIP) and corresponding Tentative Agreement (TA) have 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 1/31/19 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.

Closed:

4. Milestone M-035-09K "Conduct biennial assessments of information and data access needs with EPA and Ecology"

Reference: 19-NWP-050, 19-AMRP-0059
Affected Milestones: M-035-09K (potentially)
Originated: 04/24/19
Status: Potential for dispute exists
Dispute Extended: N/A
Action: Status only
Comments: On 03/15/19, Ecology sent DOE letter 19-NWP-050, stating that it believed M-035-09K was in jeopardy of being missed, and that it had determined that DOE was non-compliant with TPA sections 9.6.2 and 9.6.5. In the same letter, Ecology stated that DOE must grant Ecology access to "all data and databases that are relevant to work performed or to be performed

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under the TPA by March 31, 2019” or face potential penalties of \$5,000 for the first week and \$10,000 per week, per violation thereafter. On 03/29/19, DOE sent Ecology letter 19-AMRP-0059, stating that it had completed a full assessment of the data access needs spelled out in milestone M-035-09K, and thereby had met the milestone. At the 04/24/19 IAMIT, Ecology stated they could see a potential dispute for this milestone and requested a meeting be scheduled prior to the next regularly scheduled IAMIT on 05/16/19, to see if their issue can be resolved. This meeting was held 05/07/19, with no resolution. The Parties continue informal resolution.

Closed:

Table III. Recently Closed/Other Agreements

1. Milestone M-037-10/Closure Actions for Five Specified TSDs, aka “Coordinated Closure”

Reference: TPA Milestone M-37-10: *Complete Unit-Specific Closure Requirements according to the closure plan(s) for six (6) TSD Units: 207-A South Retention Basin, 216-A-29 Ditch, 216-A-36B Crib, 216-A-37-1 Crib, 216-B- 63 Trench, and Hexone Storage and Treatment Facility (276-S-141/142).*

Affected Milestones: M-037-10 (Due 9/30/2020); TPA Action Plan, Sections 3.3, 5.5, 6.1, 7.4.2

Originated: 1/18/18

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to agree that TSD closures will be coordinated with the OUs, then determine best way to adjust the milestone.

Comments: Via RCRA Permit Rev. 9 discussions, agencies have agreed that closure of land-based TSDs can be coordinated with surrounding OUs. Should Milestone M-037-10 and TPA Sections 3.3, 5.5, 6.1, and 7.4.2 be altered, the potential exists for TPA negotiations, tentative agreement and/or public comment. The Parties are working on this change at the Project Manager level, and it is being proposed that this item no longer be tracked at the IAMIT level. At the 04/24/19 IAMIT meeting, the IAMIT agreed to send this back to the Project Manager level. 05/07/19 - Received via email from Ecology, proposed schedule to prepare for public comment, the final draft proposed changes to TPA Sections 3.3, 5.5, 6.1, and 7.4.2 and proposed coordinated closure milestones will be shared with DOE, their contractors, and Ecology on 05/16/19.

Closed: 04/24/19