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HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
INTERAGENCY MANAGEMENT INTEGRATION TEAM (IAMIT)
DECISION / DETERMINATION / ACTION ASSIGNMENT
Number: 2018-001

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 Tri-Party Program Managers' agreement on the use and application of the most recent version of the EPA-approved ProUCL software.

DETERMINATION

The purpose of this determination is to confirm agreement among Tri-Party Program Managers from the U.S. Department of Energy, Richland Operations Office (DOE-RL); the U.S. Department of Energy, Office of River Protection (DOE-ORP); the U.S. Environmental Protection Agency (EPA); and the Washington State Department of Ecology (Ecology) on the calculation of exposure point concentrations (EPCs) using the most recent version of the EPA-approved ProUCL software (Version 5.1 or more recent versions). ProUCL is used during the exposure assessment step in baseline risk assessments across the Hanford Site. This determination acknowledges and builds upon the decision reached for the 200-SW-2 RI/FS/RFI/CMS Work Plan (see attached letter 16-NWP-130 dated 07/27/16 from Ecology to DOE).

The Tri-Party Program Managers agree:

- The data set will be used as described in the data quality objectives.
- Data validation and data usability assessment will be performed as defined in the work plan.
- The most recent version of the EPA software, ProUCL, shall be used to calculate EPCs for baseline risk assessments.
- 'Non-detects' are used during the calculation of EPCs as provided by the ProUCL software algorithms.
- When ProUCL cannot calculate a UCL value or does not provide a "suggested UCL to use," the maximum observed concentration will be used as the EPC.
- The highest "suggested upper confidence limit (UCL) to use" provided in the ProUCL output file shall be used as the EPC, unless the ProUCL output file provides a warning indicating that the "recommended UCL exceeds maximum observation." When the recommended UCL exceeds the maximum observation, the maximum observed concentration will be used as the EPC.

(Continued on next page)

IS THIS DETERMINATION

FINAL INTERIM (Further action to be taken)

IAMIT MEMBER APPROVALS

[Signature]
W.F. Hamel, DOE-RL

11/15/2018
Date

[Signature]
R.G. Hastings, DOE-ORP

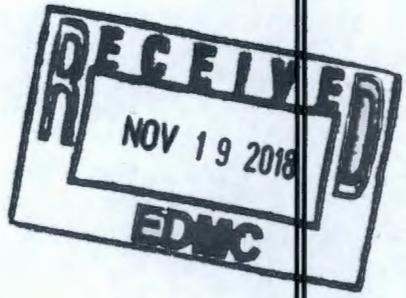
11/15/18
Date

[Signature]
D.R. Einan, Einan

11/15/2018
Date

Alexandra K. Smith
by [Signature]
A.K. Smith, Ecology

11/15/2018
Date



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DETERMINATION (continued):

- When the recommended UCL exceeds the maximum observation, prior to completing the draft baseline risk assessment DOE will discuss with the lead regulator these occurrences with the goal to better understand potential impacts on the results and confirm the data quality objectives have been met. This process step will support the future regulatory review of the remedial investigation report or other CERCLA/RCRA regulatory documents.
- DOE will identify the occurrences of suggested UCL > maximum observation and document the cause(s) of the occurrence including (but not limited to):
 - review of the individual analytical results (for example, number of detects vs non-detects, range of concentrations, observed trends, and so on),
 - identify possible data quality issues such as dilution, matrix interference, laboratory contamination, sample misidentification, use of estimated concentrations with B or J flags, etc., and
 - provide a preliminary determination of the impact on decision-making by providing the preliminary cancer risks or non-cancer hazards associated with the maximum and suggested UCL value for each occurrence.
 - Also, occurrences identified by the lead regulator as being 'of interest' will be documented and discussed in the uncertainty evaluation section of the baseline risk assessment; and the regulators can comment on the contents of the uncertainty evaluation.

Ecology, EPA, DOE-RL, and DOE-ORP agree that comments about the use and application of the most recent version of the ProUCL software, as defined above, will no longer be addressed. This determination does not limit comments by the regulators on data quality objectives, data quality issues, or decisions/recommendations based on ProUCL output.