

Inter-Agency Management Integration Team (IAMIT) Meeting Minutes

Special Topic: Issue Resolution of Groundwater Recharge Rates and Polychlorinated Biphenyl Analysis Method Selection

Department of Ecology
Richland, Washington

May 16, 2019

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Groundwater Recharge Rates and Polychlorinated Biphenyl Analysis Method Selection
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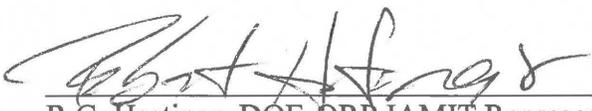


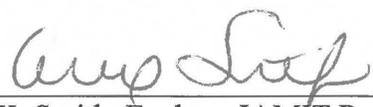
Tri-Party Agreement

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

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1.0 INTRODUCTION

The Washington State Department of Ecology (Ecology) and U.S. Department of Energy (DOE) staff presented their views on April 24, 2019, to the Inter-Agency Management Integration Team (IAMIT) on two subjects – one pertaining to groundwater recharge rates and another to polychlorinated biphenyl (PCB) analysis methods. The purpose of this IAMIT meeting was to resolve the two issues.

2.0 POLYCHLORINATED BIPHENYL ANALYSIS METHOD SELECTION

2.1 Summary

Ecology accepted DOE's (April 24, 2019) proposal to perform U.S. Environmental Protection Agency (EPA) method 8082 analysis on shallow zone samples at 20 waste sites, and EPA method 1668 only when method 8082 detects aroclors above the practical quantitation limit [PQL] of 0.033 mg/kg, with the caveat that Ecology has the right to take split samples. The parties agreed to update the language in the work plan and sampling and analysis plan (SAP), and document the agreement in IAMIT meeting minutes as well as an IAMIT determination. The parties agreed the decision would be unit-specific, applying to 200-EA-1 operable unit sites only, so as not to set a binding precedent for future sampling.

2.2 Discussion

Ecology accepted DOE's (April 24, 2019) proposal with the caveat that Ecology has the right to take split samples. DOE acknowledged that Ecology always has the right to take split samples. Ecology stated that the parties would update the work plan and SAP for the 200-EA-1 operable unit.

MSA asked if the IAMIT intended to document the agreement in anything other than the work plan and SAP. Ecology stated it would like DOE's proposal to be documented. DOE explained that the proposal specifically stated that congener analysis would be performed when aroclors above the PQL are detected.

DOE stated that if congener analyses were not performed and there was a method 8082 hit above the PQL, peer review methodology would establish toxic equivalents (TEQ).

The EPA asked for clarification if Ecology intended to perform method 1668 analysis on all detects above the PQL. Ecology stated that what EPA is asking is if DOE would perform method 1668 analysis on any detects above the PQL in all of 200-EA-1, or just any detects identified in Ecology's proposed subset of sites. Ecology continued that DOE's theory is that there will be no detects above the PQL, so the number of method 1668 analyses could potentially be zero.

DOE described two ways to do TEQ calculations. Ecology explained that their chemists do not agree with DOE's theory, so they are reserving the right to take split samples and run

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method 1668 analysis themselves. Ecology intends to document their difference of opinion in any IAMIT determination proposed. DOE stated that this approach was reasonable.

EPA asked about the number of samples per waste site, and Ecology indicated that the number of samples per site would vary greatly because of the widely variable site characteristics. DOE stated that the 20 identified sites were shallow, and would include two to three samples, for a total of 50+ samples if detects are found above the PQL. Ecology reiterated that they would reserve the right to take split samples.

The parties agreed to update the language in the work plan and SAP, and document the agreement in IAMIT meeting minutes as well as an IAMIT determination. The parties agreed the decision would be unit-specific, applying to 200-EA-1 sites only so as not to set a precedent for future sampling.

3.0 GROUNDWATER RECHARGE RATES FOR THE 200-EA-1 OPERABLE UNIT

3.1 Summary

Ecology accepted DOE's (April 24, 2019) proposal to perform sensitivity analysis with the cumulative impacts evaluation (CIE) tools when they come online as long as the parties document the agreement in an IAMIT agreement that provides for a fallback plan if the CIE does not perform as expected or come online as scheduled. The parties agreed to draft an IAMIT determination to document the agreement.

3.2 Discussion

Ecology recalled during its April 24, 2019, presentation, DOE had indicated sensitivity analyses could be performed using the CIE tools when they come online. Ecology stated agreement with DOE's approach as long as the agencies sign an IAMIT determination stating that the CIE will run sensitivity analyses, and the agencies will evaluate the results of those analyses. DOE asked if Ecology was suggesting isolated runs respective to the 200-EA-1 operable unit or larger runs.

Ecology explained that the work plan only referenced running the groundwater model impacts through the CIE. As the CIE matures, Ecology continued, the agencies will have a better idea of which analyses would provide the most meaningful information about overall impacts.

DOE explained that the CIE is planned to have the capability to perform analyses with different recharge rates in different areas in the same model run. DOE suggested the IAMIT determination language should reflect that sensitivity analyses would be performed when warranted, and not in a wholesale manner. Ecology stated they are waiting to see the CIE approach document, which they expect in the next couple of months. DOE and Ecology agreed to draft an IAMIT determination. Ecology stated that it also should be documented in the work plan, and that Ecology would like the IAMIT determination to include a fallback plan if the CIE does not perform as expected or come online as scheduled. DOE agreed with the concept, and acknowledged that some areas will have higher reasonable uncertainty than others.

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DOE asked if Ecology is ready to approve the work plan once the recharge wording is updated. Ecology stated there was one other minor issue that needed to be resolved before they would be ready to sign the work plan, and that they would probably be prepared to sign the plan in a month. DOE stated that the contractor had recommended language to address the minor issue. DOE explained that 200-EA-1 work needed to be completed before work could begin on the 200-IS-1 work plan, and DOE had advised its contractor to expect to begin work on 200-IS-1 in June. Ecology said that was a good plan.

MSA asked about next steps, and the parties discussed the possibility of having the 200-EA-1 work plan ready for signature at the next regularly scheduled IAMIT (June 20, 2019). The parties agreed to status the issues and associated IAMIT determinations at the next regularly scheduled IAMIT.

4.0 OTHER ITEMS

DOE described having sent MSA the Inner Area Principles language that was incorporated in the 200-SW-2 work plan, and that MSA will send the language to DOE and Ecology. DOE remarked that the IAMIT core members should meet to discuss feasibility of adopting the principles before engaging other staff. If the agencies come to an agreement on the principles, that agreement will be documented in an IAMIT determination.



*TPA Interagency Management Integration Team Meeting
Attempt to Resolve Goundwater Recharge /PCB Congeners
Issue*

May 16, 2019

<u>Name</u>	<u>Organization</u>
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<u>Alex Smith</u>	<u>Ecology</u>
<u>Scott Davis</u>	<u>USA</u>
<u>Brian Harkin</u>	<u>DOE</u>
<u>Fed LOBOS</u>	<u>DOE</u>
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<u>Michael Clune</u>	<u>DOE</u>
<u>Carolyn Nanan</u>	<u>MSA</u>
<u>R Douglas Heibel</u>	<u>DOE</u>
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