

# Inter-Agency Management Integration Team Meeting Minutes February 18, 2021



## SIGNATURES:

Approval: William F. Hamel Digitally signed by William F. Hamel  
Date: 2021.03.24 17:27:29 -07'00' Date: \_\_\_\_\_

W.F. Hamel, DOE-RL IAMIT Representative

Approval: Delmar L. Noyes Digitally signed by Delmar L. Noyes  
Date: 2021.03.18 12:13:07 -07'00' Date: \_\_\_\_\_

D.L. Noyes, DOE-ORP IAMIT Representative

Approval: David B. Bowen Digitally signed by Bowen, David (ECY)  
Date: 2021.03.18 14:03:14 -07'00' Date: \_\_\_\_\_

D.B. Bowen, Ecology IAMIT Representative

Approval: David P. Einan Digitally signed by DAVID EINAN  
Date: 2021.03.18 12:50:57 -07'00' Date: \_\_\_\_\_

D.R. Einan, EPA IAMIT Representative

# **Inter-Agency Management Integration Team Meeting Minutes February 18, 2021**

## **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); herein referred to as the Parties.

Due to the Hanford Site's current Phase 2 Remobilization process stemming from the COVID-19 (coronavirus) pandemic, this meeting was held remotely via video and telecom utilizing the Microsoft Office Teams software, a communication and collaboration platform.

## **2.0 REVIEW IAMIT ACTION TRACKING TABLE**

### **2.1 Action Items**

#### **2.1.1 Agreement in Principle for the Negotiation of HFFACO Revisions in Response to Federal Fiscal Year (FFY) 2018-2020 Appropriation in Conjunction with the Representative Analogous Site Coordinating Agency Liaisons (RASCAL) Recommendations for Expediting Remedial Cleanup on the Hanford Central Plateau (or Budget/RASCAL AIP)**

On August 25, 2020, the Parties signed an Agreement in Principle (AIP) for the Negotiation of Hanford Federal Facility Agreement and Consent Order (HFFACO) Revisions in Response to Federal Fiscal Year (FFY) 2018-2020 Appropriation in Conjunction with the Representative Analogous Site Coordinating Agency Liaisons (RASCAL) Recommendations (IAMIT Determination 2020-006) for Expediting Remedial Cleanup on the Hanford Central Plateau (or Budget/RASCAL AIP). The Parties were in negotiations and planned to conclude these negotiations by January 15, 2021, with a signed Tentative Agreement.

At the November 19, 2020 IAMIT meeting, EPA stated they were eager to get the integrated schedule and costs from DOE because they have been following their Superfund tracking and would like to have new dates for these activities.

At the December 17, 2020 IAMIT meeting, DOE had the action to provide the Parties with the current working assumption response and the integrated schedule and cost spreadsheet.

At the January 21, 2021 IAMIT meeting, DOE stated they are still working on gathering the costs and getting them distributed to the Parties. DOE noted during negotiation meetings that the Parties have been discussing the breakouts of the 200-IA-1, 200-SW-2, and 200-WA-1 Operable Units (OU).

At the February 18, 2021 IAMIT meeting, DOE confirmed the Parties had met, and the costs and the integrated schedule were provided to Ecology and EPA. However, DOE stated it does not believe it will have adequate funding to do some of the work for another 7-10 years.

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Ecology stated it has become clear that the TPA M-016 milestones need to be discussed along with the M-015 milestones and a meeting was scheduled for the week of February 22, 2021.

EPA stated it was mentioned during a negotiation meeting that each of the Parties would discuss the constrained and unconstrained rough costs that were provided by DOE and that there was a potential issue regarding whether the Parties could successfully negotiate it at the project manager level.

Ecology added that if the funding constraints DOE is representing are pushing the existing dates to finish the M-015 and M-016 milestones, it will be difficult to negotiate these at the project manager level and noted at some point there will have to be a higher-level discussion about these milestones.

DOE stated they would like to have every discussion that the Parties reasonably can at the project manager level but understood this discussion would have to be elevated.

DOE also noted they would provide draft change control forms without milestone due dates at the next meeting to show the breakout of the work for the 200-IA-1, 200-SW-2, and 200-WA-1 OUs.

Ecology noted the issue about generating enough contaminated soil to mix with the building D4 debris, but this topic would be discussed in Section 2.2.4 below.

There was no action taken and this item will be tracked at the IAMIT level in the interim.

### **2.1.2 Changes/Updates to TPA Paragraphs 148/149**

On July 30, 2020, the Parties approved an extension to the TPA Paragraphs 148/149 AIP, which enabled negotiations to continue through January 15, 2021. The Parties held two negotiation sessions in August 2020.

At the September 17, 2020 IAMIT meeting, the Parties agreed to put these negotiations on hold until the “Hanford tank waste mission holistic negotiations” progress further.

At the January 21, 2021 IAMIT meeting, MSA noted an extension to the TPA Paragraphs 148/149 AIP was signed by the Parties on January 7, 2021 and these negotiations currently expire on July 31, 2021.

At the February 18, 2021 IAMIT meeting, it was noted these negotiations are still on hold pending further progress in the “Hanford tank waste mission holistic negotiations.” This item will be tracked at the IAMIT level in the interim.

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### **2.1.3 Potential Agreement in Principle to Begin Negotiations on Waste Management Area (WMA) C Closure Milestones**

At the June 18, 2020 IAMIT meeting, Ecology suggested the Parties enter into an AIP to negotiate these milestones formally. DOE committed to updating the IAMIT in July on its willingness to enter into an AIP to negotiate the WMA C milestones with Ecology.

At the July 16, 2020 IAMIT meeting, DOE showed interest in entering into an AIP to negotiate these milestones with Ecology, at Ecology's request, but wanted to discuss the potential negotiation topics and milestones further with Ecology prior to committing. Ecology stated they did see some feedback on this from the holistic negotiations and WMA C closure is one of the areas being negotiated between DOE and Ecology. Ecology further stated that not knowing when the holistic negotiations will conclude does not give them assurance they will have closure schedules in time to put WMA C into the Resource Conservation and Recovery Act (RCRA) Revision 8 Permit. Ecology indicated this is driven by the need to have closure schedules to put the Closure Plan into the Permit. Therefore, Ecology believed entering into an AIP would provide a hard date to finish negotiations.

At the August 25, 2020 IAMIT Meeting, DOE stated a meeting was held with Ecology to discuss this further; however, not all applicable Ecology staff members were able to attend. Therefore, DOE indicated the meeting would need to be rescheduled to include the appropriate Ecology staff in these discussions. DOE also noted the WMA C milestones are part of the ongoing "Hanford tank waste mission holistic discussions" being conducted between DOE and Ecology.

At the September 17, 2020 IAMIT meeting, the Parties indicated that DOE and Ecology met twice to discuss these milestones and DOE stated the WMA C milestones are part of the ongoing "Hanford tank waste mission holistic negotiations" between DOE and Ecology. However, Ecology requested another meeting with DOE to discuss the proposed mega barrier, which would cover WMA C after remediation.

During the October 15, 2020 IAMIT Meeting, Ecology stated they met with DOE and appreciated the information that DOE had provided on the mega barrier issue. Ecology added that they would review the information and get back to DOE in a few weeks. Ecology also added that the WMA C closure milestones are not interdependent with any other part of the tank waste mission and that the only tie-in to the Hanford tank waste mission holistic negotiations is budget-related.

At the November 19, 2020 IAMIT meeting, DOE stated they had met with Ecology and provided a briefing showing what a potential standalone "mega" barrier would look like. DOE also reiterated they believe there is a nexus from this action back to the holistic negotiations as it relates to TPA Appendices H and I, since these appendices are being worked by a subcommittee. Ecology responded this information was correct.

At the December 17, 2020 IAMIT meeting, Ecology noted that they were waiting for DOE to clear the mega barrier presentation for public release.

At the January 21, 2021 IAMIT meeting, DOE stated the mega barrier presentation had been cleared and was provided to Ecology. Ecology confirmed receipt of the presentation. Ecology also stated a draft letter had been provided to DOE and this letter would be sent officially to

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DOE, as this item had been tracked for several months and Ecology would like to push forward on this IAMIT action.

On January 28, 2021, Ecology sent a letter (21-NWP-018) to DOE asking for a discussion on the WMA C Closure Milestones at the February 21, 2021 IAMIT meeting. Ecology stated in their letter that DOE had told Ecology that the WMA C closure milestones should be part of the ongoing holistic negotiations related to Consent Decree and TPA milestones addressing tank waste retrieval and waste treatment. Ecology consistently disagreed with that premise, noting that closure of WMA C is independent of future single-shell tank retrievals and waste treatment.

At the February 18, 2021 IAMIT meeting, Ecology stated they had sent draft change control forms to DOE with draft milestones and were waiting for a response from DOE.

DOE noted they received the letter (21-NWP-018) from Ecology and a draft for C Farm closure and are working on a response to Ecology. However, DOE maintains that WMA C closure is being dealt with through the holistic negotiations. DOE added that the WMA C requires resources and capabilities and the period of performance directly impacts retrievals, closures, and all the other enforceable milestones that are in place. Therefore, DOE continues to believe that this element cannot be independently negotiated and agreed to, given the capability of performing the work associated with this scope is incompatible with the standing Consent Decree and legal commitments that DOE already has in place, at least at this time.

Ecology responded that they appreciated DOE articulating this information and would pass it up through their management chain and get back to DOE.

There was no action taken and this item will be tracked at the IAMIT level in the interim.

### **2.1.4 On-site/Off-site Waste Control Plans and RCRA/CERCLA Delineations Related to the Central Waste Complex**

At the January 21, 2021 IAMIT meeting, EPA suggested DOE may be misinterpreting or misapplying RCRA/CERCLA delineations on the Waste Control Plan for the Central Waste Complex. EPA noted this issue stems from the Engineering Evaluation/Cost Analysis for the Tier 2 West building Deactivation and Demolition. The Parties agreed to each identify staff to discuss this further. The Parties took the action to assign staff to discuss and prepare for an IAMIT briefing. The Parties identified the following staff:

- Kelly Elsethagen, Ecology
- Craig Cameron, EPA
- Patty Ensign, DOE-RL

At the February 18, 2021 IAMIT meeting, Hanford Mission Integration Solutions, LLC (HMIS) stated this item had been resolved and could possibly be closed out and asked EPA for concurrence.

EPA responded that there was a commitment made by DOE to put an on-site determination for Environmental Restoration Disposal Facility (ERDF) into the Action Memorandum. EPA noted they have an issue with DOE's hesitancy to follow the Administrative Law Judge ruling

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(reference Hanford Administrative Record accession #[AR-09164](#)) and this issue may be raised again. However, EPA agreed this action could be closed. This item will not be tracked at the IAMIT level.

### **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 meeting, the Parties agreed revisions to Appendices H and I would be placed on hold pending the potential path forward determined from the Hanford tank waste mission holistic discussions. DOE proposed to continue tracking until discussions conclude.

At the February 18, 2021 IAMIT meeting, there was no update provided. This item will be tracked at the IAMIT level in the interim.

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

At the February 20, 2020 IAMIT meeting, DOE noted the proposed changes to Section 9.4 have some nexus to the M-035-09K dispute. The Parties agreed this item should be placed on hold pending the M-035-09K dispute that is with the Washington State Pollution Control Hearings Board.

At the February 18, 2021 IAMIT meeting, there was no update provided. This item will be tracked at the IAMIT level in the interim.

#### **2.2.3 Waste Management Area A/AX Closure Process “Kaizen”**

At the September 17, 2020 IAMIT meeting, the Parties agreed to postpone the Kaizen until January 2021. The Parties also agreed that the scope of the Kaizen should be expanded to include, among other possible subjects, lessons learned from the Single-Shell Tank closure process.

At the January 21, 2021 IAMIT meeting, MSA noted that a Kaizen workshop was scheduled for January 26, 2021, followed by a 3-day Kaizen on February 22-25, 2021, and the Parties had been trying to prepare the scope for this Kaizen. DOE stated that Ecology believes the scope of this Kaizen is too broad and would like to narrow the scope. Ecology confirmed this statement was accurate. The Parties agreed the Kaizen workshop would attempt to narrow the scope.

On January 25, 2021, the Parties agreed to put the Kaizen on hold until the scope could be defined and cancelled the January 26, 2021 Kaizen workshop.

At the February 18, 2021 IAMIT meeting, Ecology noted the scope is being discussed by a subcommittee for the holistic negotiations and believes this item will be placed on hold until those discussions conclude. This item will be tracked at the IAMIT level in the interim.

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### **2.2.4 Gaps in Deactivation, Decommissioning, Decontamination, and Demolition (D4) Planning**

At the April 16, 2020 IAMIT meeting, DOE took the action to provide an update to the IAMIT on D4 planning efforts once the site is able to resume normal operations, pending ongoing mission essential operations due to coronavirus and pending transition of Hanford prime contracts.

At the October 15, 2020 IAMIT meeting, EPA pointed out that it would be helpful to have a rough order of magnitude on the contaminated soil and rubble volumes to inform negotiations. EPA requested that DOE provide to EPA and Ecology its expectation for “level of detail” on information it would be providing prior to beginning formal discussions on D4 planning.

At the November 19, 2020 IAMIT meeting, DOE stated they are evaluating the M-091 transuranic waste and need to make sure the contractor re-evaluates the contaminated soil and building rubble. DOE took the action to evaluate the contaminated soil and building rubble strategy, ratio strategy, and integration with the M-091 transuranic waste to coincide with the entire shipping sequence, with respect to the inventory.

At the January 21, 2021 IAMIT Meeting, DOE noted they have started looking at this; however, they need to get through contract transition and get the new contractors on board in order to identify and obtain the information necessary to evaluate a path forward. DOE acknowledged this action item has been delayed pending contract transition and took the action to provide an update to the Parties at the February IAMIT.

At the February 18, 2021 IAMIT meeting, DOE provided an update, stating they had completed contract transition to the Central Plateau Cleanup Company (CPCCo) contractor and were starting work on task orders that will define the work moving forward after a 4-6 month implementation period. DOE also stated they have had several meetings this week to discuss contaminated soil and debris going to ERDF. DOE noted the site is not disposing of much volume, even debris or soil, at ERDF right now, so they have some time to establish a plan moving forward into 2022.

EPA noted they appreciated DOE working on this now as it has been a while and they look forward to seeing what CPCCo suggests and having these meaningful discussions.

DOE added these discussions will likely begin in the near-term and may happen as soon as next month.

There was no action taken and this item will be tracked at the IAMIT level in the interim.

### **3.0 WMA A/AX CLOSURE REQUIREMENTS FOR THE INTEGRATED PERFORMANCE ASSESSMENT STUDY AND THE BOUNDARY FOR WMA A/AX**

At the January 21, 2021 IAMIT Meeting, Ecology suggested the WMA A/AX Tank Farm scope for the Integrated Performance Assessment (IPA) Study, which is part of the closure process, be discussed at the February 18, 2021 IAMIT. Ecology sent DOE a proposed outline of the IPA

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and believes the Parties are not in agreement on the outline. Ecology also mentioned there is a disconnect between the Parties on the boundaries of A/AX Tank Farm and wanted to start discussions on this topic early. DOE did not object to having this discussion.

At the February 18, 2021 IAMIT Meeting, DOE stated they had met with Ecology several times and DOE has shared a draft letter with Ecology that DOE is in the process of sending officially, which delineates what DOE will be using for the A/AX boundary and believed Ecology is not in agreement with the boundary.

Ecology responded by stating they had not seen the draft letter and wanted to explain their concerns with the A/AX boundary. Ecology proceeded to show a map (see Enclosure 1) and stated that DOE is proposing to stay within the boundaries of the outlined area for A/AX and A Farms. Ecology added they had concerns about the area to the right of the A/AX Farm area that seemed logical to address at the same time as A and AX. Ecology provided some background on the Remedial Field Investigations (RFI) for DOE and Ecology, and stated the information for tank farms is used for modeling and the IPA. While the soil characteristics within the boundary of the farm are very important for the modeling, including the structure made sense for the purpose of the IPA in reaching closure of that unit, as the soil and the area were not included in DOE's previous proposals to do interim barriers over tank farms that cannot be closed. In the case of A/AX, Ecology stated, DOE has chosen to retrieve this tank farm and it is in an area where it is not possible to construct a final barrier. Ecology's proposal was to include the areas to the right and since AY-102 is no longer fit for use, Ecology proposed including the soil south of AY-102 as part of the overall structure, so that when an interim barrier was placed in this area, it can encompass all of the contaminated waste. Ecology noted they did not have a preference for how DOE organizes their work, but ideally, in the tank farms, there would be an Integration Study where the Parties would talk about how to approach closure of A/AX. However, DOE has not completed the Integration Study yet and the Parties are in disagreement on what the contents of the Integration Study should be. Ecology added that if the Parties had the discussion prior to DOE establishing their modeling structure, they may or may not have been able to consider these options. Again, Ecology stated if DOE wants to have the AR vault coordinated with the operable unit, Ecology was willing to talk about that, but DOE did not engage in that discussion and subsequently the discussions ended. Ecology also clarified that a final barrier could not be constructed by adding the location of A and AX Farm because it is within the boundary or adjacent to some double-shell tanks (DST) and it is a busy section of the site. Therefore, Ecology anticipates that DOE will have a final barrier that is narrowly addressing this section of property, but the Parties have not finalized negotiations for a Closure Plan. From Ecology's perspective, it would not be wise to try to construct a final barrier for A/AX because of the location in the DST farms, so placement of an interim barrier makes sense.

DOE stated the discussions to change the boundaries to outside the fence line occurred too close to the milestones for DOE to be able to make those changes and meet their existing milestones. Had DOE known about this issue in advance, they may have been able to entertain some of these changes, but DOE noted that some of those facilities are not overseen by the same contractors, which would entail contract changes. Additional modeling would also be necessary. Collectively, these changes all affect DOE's ability to meet existing milestones. DOE added they identified their position to stick with the fence line, which was discussed in the past. DOE



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prefers to stay with the milestone agreement, as they need to be able to move forward and meet their milestones.

Ecology noted DOE has been working on A/AX Farm for 9 years and they could have approached Ecology to discuss plans and what they wanted to do, but chose not to. Ecology also noted DOE mentioned concerns with meeting milestones, but part of the process in the TPA allows for modifications of milestone due dates if appropriate. Ecology made this suggestion, and, according to Ecology, it was not an idea acceptable to DOE.

DOE responded by showing a map (see Enclosure 2) of the A/AX Farm boundary. DOE pointed out that they included the 241-A-302B tank outside the boundary as suggested by Ecology. DOE added that they did not include the AR Vault because it should be addressed with the 200-IS-1, as a CERCLA OU. DOE also added that the AY-102 area that Ecology mentioned is a DST and DOE does not agree with including the area around the DSTs, as it does not follow the established single-shell tank (SST) closure process.

Ecology stated they were glad DOE chose to include those areas and said they were not made aware of that change. Ecology added that the AR Vault and DST area is all they were asking for to be included or coordinated and still have not received a response from DOE in this regard. Ecology asked a clarifying question about the Ecology suggestion to include 241-A-302B in the A/AX boundary.

DOE responded that the 241-A-302B was already included in the A/AX boundary, but that Ecology had suggested to DOE that they add the soil outside of the fence line (see Enclosure 2, gray area on the map around 241-A-302B).

DOE wanted to address that this discussion was held as requested by Ecology and appreciated both parties sharing their perspectives. DOE added that ultimately this is based upon priorities and believe that consistent with the milestones, sequence of the milestones, and follow-on work as envisioned and as agreed to, they understand there is some other potential scope in here and they do understand the value of it. However, this is additional scope in those activities, so if that is of value in relative priority space, then DOE would need recognition of the impact to these milestones and the additional scope that would be required to complete work in other milestones to be able to proceed and reach the end-point.

Ecology noted this discussion was really good, appreciated both parties' perspectives, stated this is a complicated situation, and wanted the meeting minutes to discuss internally with Ecology staff and with EPA, in order to figure out what they want to do next.

DOE wanted to provide additional information and added that in 2017, the decision was made to start using focus areas. The focus areas were utilized because the Parties could not agree on a boundary. DOE stated they ended up with two separate focus areas to gather soil data and are in the process of gathering the information for that second focus area. Now, DOE needs to complete the boundary established to get the Integration Study completed. In addition, Ecology asked DOE to provide a briefing for the Tribes and Hanford stakeholders for the data quality objective (DQO) portion of the Integration Study, but DOE stated it cannot do that until they establish the scope. DOE added that this delays what can be provided to the stakeholders and wanted to ensure this information was not missed in this discussion.

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Ecology asked DOE to clarify the blue area (see Enclosure 2) and if this area was included in the boundary or excluded from the boundary of investigation.

DOE responded by saying the blue area (see Enclosure 2) is part of a CERCLA OU, so it would not be included in the A/AX boundary.

Ecology suggested the A/AX boundary discussion be discussed at the March 18, 2021 IAMIT to see if the Parties could reach resolution.

DOE stated that if a decision is not reached soon, DOE will have milestones in jeopardy and will evaluate those impacts and communicate them to Ecology.

There was no action taken and this item will be tracked at the IAMIT level in the interim.

### **4.0 UPCOMING TOPICS/ACTION ITEMS FOR FUTURE IAMIT MEETINGS**

HMIS asked if there were emerging issues the IAMIT would like to discuss or include on upcoming meeting agendas. The IAMIT representatives did not have any new items to add.

### **5.0 REVIEW OF TODAY'S ACTIONS/UPCOMING IAMIT MEETINGS**

There were no actions captured during this meeting.

The next IAMIT meeting is scheduled for March 18, 2021.

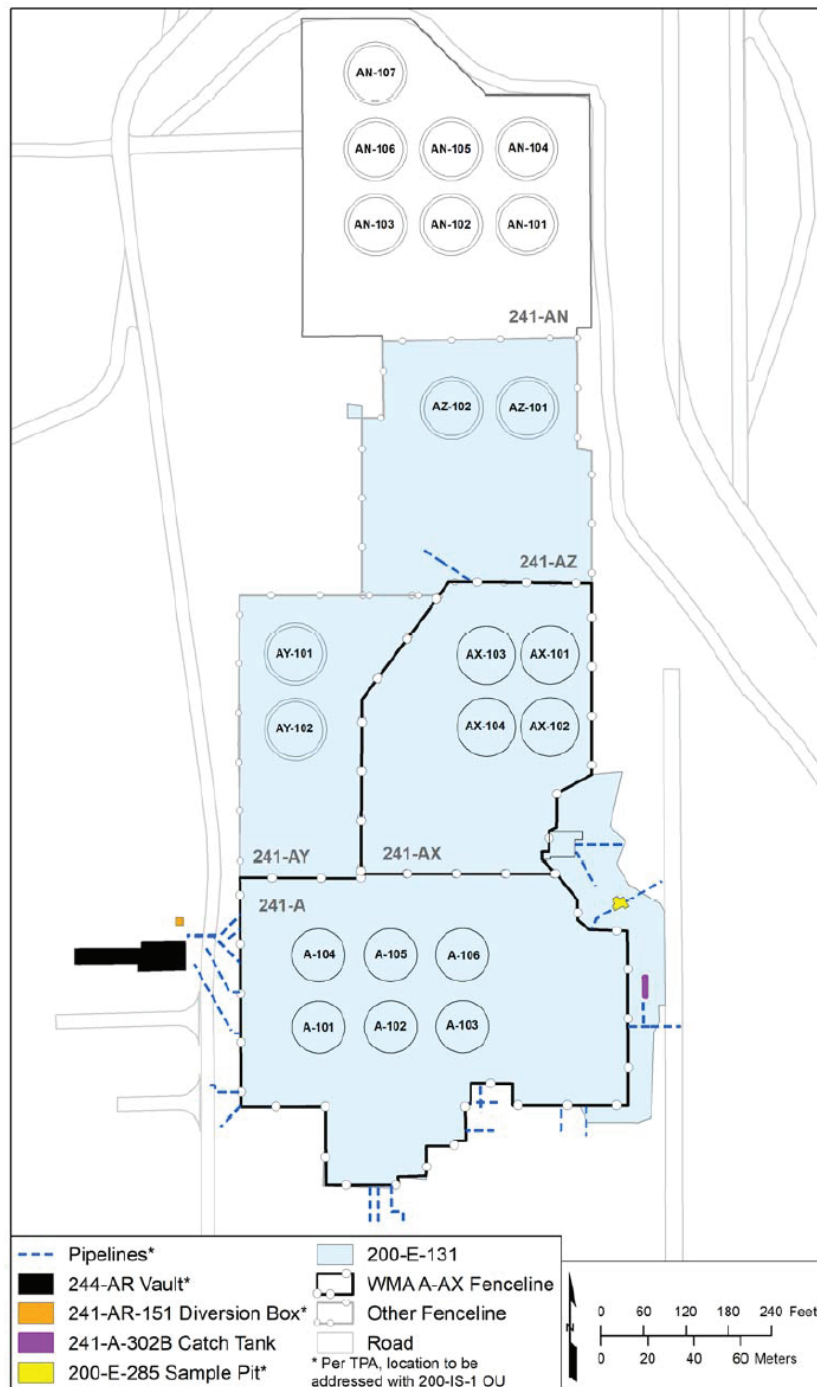
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### 6.0 LIST OF ATTENDEES

Armijo, Roberto	EPA
Bergman, Theresa	CPCCo
Bowen, David	Ecology
Bowers, Holly	WRPS
Brasher, Stephanie	HMIS
Cameron, Craig	EPA
Capron, Jason	DOE
Cline, Michael	DOE
Davis, Scott	HMIS
Einan, Dave	EPA
Fergusson, Aaron	HMIS
French, Mark	DOE
Hamel, Bill	DOE
Harkins, Brian	DOE
Higgins, Kathy	DOE
Kamal, Mostafa	DOE
Lobos, Rod	DOE
Lopez, Maria	WRPS
Lyon, Jeff	Ecology
Noyes, Delmar	DOE
Price, John	Ecology
Temple, John	Ecology
Teynor, Tom	DOE
Turner, Michael	HMIS
Welsch, Kim	Ecology

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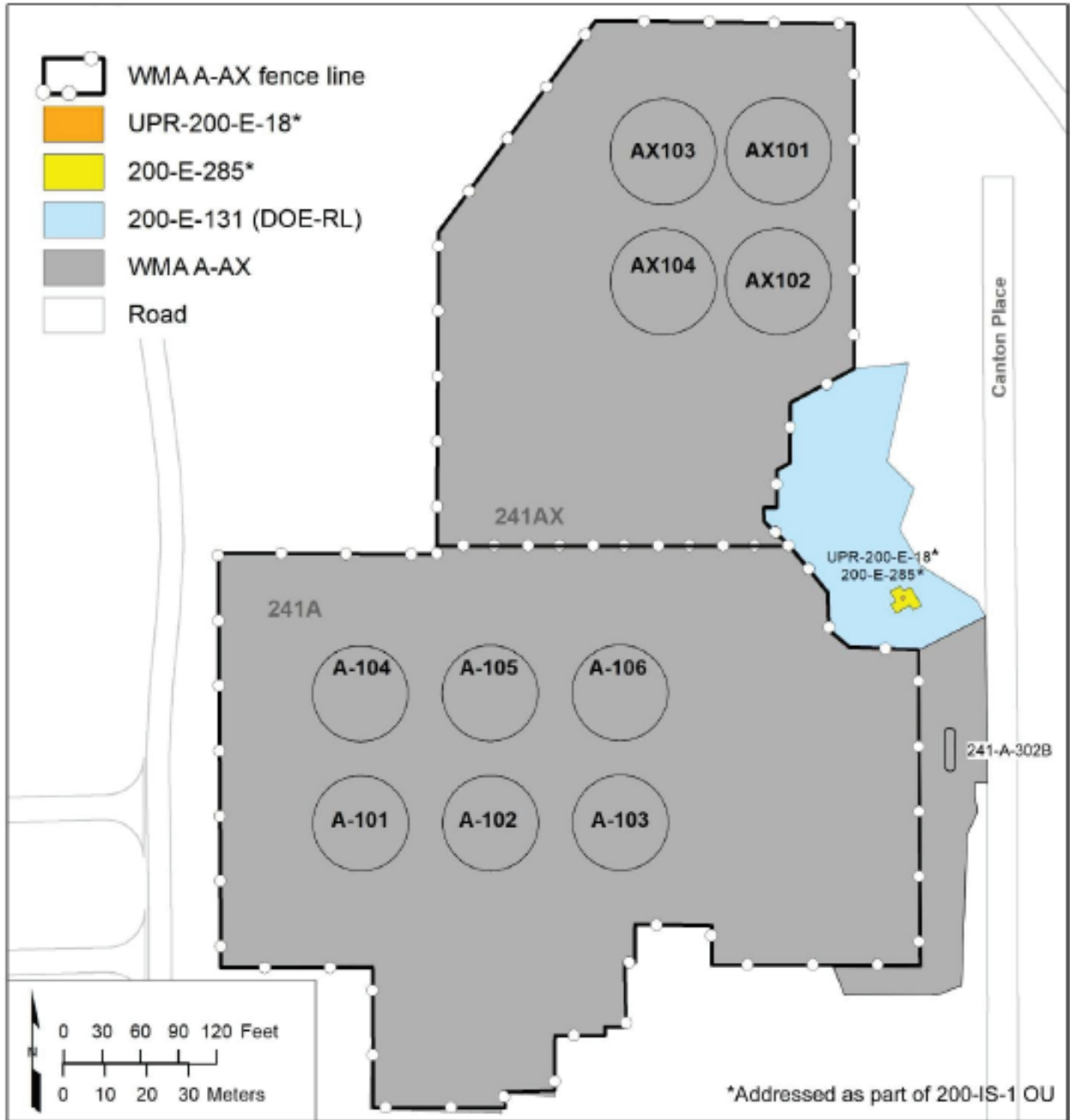
## Enclosure 1 - Figure Showing WMA A-AX and Surrounding Area<sup>1</sup>



<sup>1</sup> Reference the Waste Management Area A-AX Boundary Discussion Meeting Notes from November 3, 2020, Attachment 1, Figure Showing WMA A-AX and Surrounding Area, in the Hanford Administrative Record, accession #AR-05790.

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Enclosure 2 - Figure Showing WMA A-AX Boundary Definition<sup>2</sup>



<sup>2</sup> Reference DOE letter 21-TF-000513, dated February 18, 2021, subject: Waste Management Area A-AX Boundary, Attachment 1, in the Hanford Administrative Record, accession # AR-08918.



**Inter-Agency Management Integration Team (IAMIT) Meeting**  
**Thursday, February 18, 2021**  
**8:00 – 9:00 a.m.**

\*Meeting held via Teams video/teleconference

**Agenda**

<b>No</b>	<b>Time</b>	<b>Lead / Org</b>	<b>Topic</b>
1	8:00– 8:02 a.m.	Michael Turner, MSA	<b>Welcome and Meeting Logistics/Format</b>
2	8:02 – 8:20 a.m.	Michael Turner, MSA/ IAMIT and attendees	<b>Review IAMIT Action Tracking Table</b>
3	8:20 – 8:35 a.m.	Jeff Lyon, Ecology John Price, Ecology Delmar Noyes, ORP	<b>Potential Negotiations on WMA-C Closure</b>
4	8:35 – 8:50 a.m.	Jeff Lyon, Ecology Rod Lobos, ORP	<b>WMA-A/AX Boundary Resolution</b>
5	8:50 – 8:55 a.m.	IAMIT members	<b>New Topics for Upcoming IAMIT Meetings</b>
6	8:55 – 9:00 a.m.	Michael Turner, MSA/ IAMIT and attendees	<b>Review of Today's Actions</b>
7	9:00 a.m.	<b>Adjourn</b>	

# Inter-Agency Management Integration Team Decision Table/Action Tracking

February 18, 2021

## **TABLE I. ACTION ITEMS<sup>1</sup>**

***1. Agreement in Principle for the Negotiation of HFFACO Revisions in Response to Federal Fiscal Year (FFY) 2018-2020 Appropriation in Conjunction with the RASCAL Recommendations (IAMIT Determination 2020-006) for Expediting Remedial Cleanup on the Hanford Central Plateau (or Budget/RASCAL AIP)***

<b>Reference:</b>	Agreement in Principle (AIP) approved 8/25/20
<b>Affected Milestone:</b>	M-015-00, M-015-38B, M-015-84, M-015-91B, M-015-92B, M-015-92C, M-015-93B, M-015-93C, M-015-98, M-015-99, M-015-110B, M-015-112, M-016-200A, M-016-200-B, M-085-70, M-085-90
<b>Originated:</b>	12/20/18
<b>Status:</b>	Open - Agreement in Principle (AIP) approved 8/25/20 to conclude negotiations by 1/15/21
<b>Dispute Extended:</b>	N/A
<b>Action:</b>	Negotiating milestones
<b>Comments:</b>	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

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<sup>1</sup> \*New information shown in blue.

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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. 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. At the 4/16/20 IAMIT, an update on RASCAL Team progress was presented. The IAMIT granted approval to proceed with next steps, the RASCAL Team will: (1) Draft a White Paper, and (2) engage the contractor for cost estimates, to include cost avoidance and proposed milestones and report back to the IAMIT in a couple of months. At the 05/26/20 IAMIT, the RASCAL Team noted it was planning an update to the IAMIT in June, with a possible draft IAMIT Determination and White Paper ready for review as well. Ecology reiterated the RASCAL process will not solve all issues with all of the milestones, in particular milestone M-015-93C for the 200-



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SW-2 Operable Unit. As of 06/11/20, an IAMIT Determination had been drafted and will be shared with the IAMIT. DOE agreed to take M-015-93B and M-015-93C, out of the “budget” negotiations and add them to the M-091 milestone negotiations. At the 6/18/20 IAMIT, the Parties agreed that a new Agreement in Principle (AIP) should be drafted to address RASCAL Team milestones and others that were previously to be addressed in the draft “Budget AIP”. MSA took the action to draft the AIP, which is in review. IAMIT determination 2020-006 “RASCAL Recommendations for Expediting Remedial Cleanup on the Hanford Central Plateau” was signed on 06/23/20. At the 07/16/20 IAMIT meeting, DOE stated they were reviewing the AIPs. The RASCAL Team is currently working on completing the binning of the waste sites and plans to produce a document to memorialize how the RASCAL Team decided to bin the different waste sites. The RASCAL Team anticipates having a few more sessions to complete this process and get it documented. The Parties signed TPA Change Control Form C-20-02, establishing the new 200-IA-1 Operable Unit, on 8/11/20. Milestone M-015-93C was included in the Budget/RASCAL AIP, which was signed 08/25/20, and plans are to conclude negotiations by 01/15/2021. At the 09/17/20 IAMIT, the Parties agreed to combine discussions regarding the TPA dispute on Milestone M-015-93C/Change Control Form M-15-18-03 with the AIP for the Negotiations of HFFACO Revisions in Response to FFY 2018 Appropriation and FFY 2019 President’s Budget, which is now referred to as the AIP for the Negotiation of HFFACO Revisions in Response to FFY 2018-2020 Appropriation in Conjunction with the RASCAL Recommendations (IAMIT Determination 2020-006) for Expediting Remedial Cleanup on the Hanford Central Plateau (or Budget/RASCAL AIP). At the 10/15/20 IAMIT meeting, EPA stated the negotiations team met twice. The first meeting was an introductory meeting and the second meeting generated some general discussions and actions that DOE is currently working on and will bring back to the negotiations team at the next meeting. At the 11/19/20 IAMIT meeting, EPA stated it would like updated integrated schedule and costs from DOE.

At the 12/17/20 IAMIT meeting, DOE took the action to provide the Parties the current working assumption response and the integrated schedule and cost spreadsheet. [At the 01/21/21 IAMIT, DOE stated](#)

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they are still working on providing costs. DOE also noted that the Parties have been discussing the breakouts of the 200-IA-1, 200-SW-2, and 200-WA-1 Operable Units.

## 2. *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

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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. On 3/23/20, the Parties signed the AIP to begin negotiations, which are currently scheduled to conclude 07/31/20. On 4/07/20, Tri-Party attorneys met to discuss federal budget process and path forward to update these paragraphs. DOE provided responses to ECY/EPA attorney comments made during this meeting for their review. Action remains with ECY/EPA legal to respond back to DOE. No meetings are currently scheduled. At the 05/26/20 IAMIT, the Parties once again agreed that paragraphs 148/148 needed updating, but EPA and Ecology are still unclear of the overall desired outcome of those updates. DOE took the action to reconvene the technical staff and attorneys to continue negotiations. DOE Legal forwarded the embargoed budget guidance to the regulator attorneys and DOE is awaiting a response. On 07/30/20, the Parties signed an extension to the AIP, which will allow negotiations to continue until 01/15/21. Negotiation sessions were held on 08/05/20 and 08/18/20, as the Parties continue to negotiate the proposed changes to paragraphs 148/149. At the 09/17/20 IAMIT, the Parties agreed to temporarily suspend negotiations until the Tank Mission Holistic Negotiations progresses further. At the 11/19/20 IAMIT meeting, no update was provided. At the 12/17/20 IAMIT meeting, DOE proposed extending the AIP (expires 01/15/21) until 07/31/21. Ecology stated it would consider and respond back to the Parties. The AIP has been extended until 07/31/21. [At the 01/21/21 IAMIT, there was no change in status.](#)

Closed: ---

### ***3. Potential Agreement in Principle to Begin Negotiations on WMA-C Closure Milestones***

**Reference:** Draft TPA Change Control Form M-45-17-01

**Affected Milestone:** N/A

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<b>Originated:</b>	06/18/20 IAMIT Meeting
<b>Status:</b>	Open
<b>Dispute Extended:</b>	N/A
<b>Action:</b>	Parties are being asked to consider signing an Agreement in Principle to begin negotiations on TPA milestones for closure of Waste Management Area-C (WMA-C).
<b>Comments:</b>	<p>At the 06/18/20 IAMIT meeting, Ecology asked DOE-ORP (and by extension, all three TPA parties) if would be willing to sign an AIP and enter negotiations regarding TPA milestones for closure of WMA-C. Ecology. Draft TPA change control forms have been exchanged between Ecology and DOE-ORP since 2017, with no agreement reached. At the 07/16/20 IAMIT meeting, the Parties discussed possibly entering into negotiations. However, there was some feedback from the holistic negotiations that this topic may be included. DOE-ORP requested to meet with Ecology to discuss what might be subject to negotiations. At the 08/25/20 IAMIT, DOE stated a meeting was held with Ecology to discuss potential milestones and topics to be included in a draft Agreement in Principle; however, not all applicable Ecology staff were able to attend. DOE indicated the meeting would need to be rescheduled to include the appropriate Ecology staff in these discussions. At the 09/17/20 IAMIT, the Parties agreed that these negotiations could wait until the conclusion of the Tank Waste Mission Holistic Negotiations; however Ecology requested a meeting with ORP to discuss the WMA-C mega barrier specifically. Meeting was held 10/05/20. Ecology is now reviewing preliminary specifications and other details of the proposed barrier and will provide comments to ORP. At the 10/15/20 IAMIT meeting, Ecology stated that it views the WMA C closure milestones as independent from any other part of the tank waste mission and that the only correlation to the Hanford tank waste mission holistic negotiations is how it would be funded. DOE stated they would like to progress as much as possible with C Farm closure from a practical approach to reduce their costs of maintaining systems and reduce risk in the tank farms. Ecology agreed with DOE's statement, but wants to meet with DOE in a few weeks to continue discussions. At the 11/19/20 IAMIT meeting, there was no change in status, but the Parties agreed they would like to continue tracking this action throughout the duration of the holistic negotiations. Ecology</p>

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stated their driver is the schedule to incorporate WMA-C into the Revision 8C of the Hanford Hazardous Waste Permit. At the 12/17/20 IAMIT meeting, Ecology asked that DOE clear the “mega barrier” presentation and provide it to Ecology. At the 01/21/21 IAMIT, ORP verified that the mega barrier presentation was cleared. On 02/02/21, Ecology sent letter 21-NWP-018 asking for a discussion at the 02/18/21 IAMIT on this topic.

**Closed:** ---

#### 4. *On-site/Off-site Waste Control Plans and RCRA/CERCLA Delineations Related to the Central Waste Complex*

**Reference:** N/A  
**Affected Milestone:** N/A  
**Originated:** 01/21/21  
**Status:** Open –  
**Dispute Extended:** N/A  
**Action:** Track

**Comments:** At the 01/21/21 IAMIT meeting, EPA suggested DOE may be misinterpreting or misapplying RCRA/CERCLA delineations on the Waste Control Plan for the Central Waste Complex. EPA noted this issue stems from the EE/CA for the Tier 2 West building D&D. The Parties agreed to each identify staff to discuss this further. The Parties took the action to assign staff to discuss and prepare for an IAMIT briefing. The Parties identified the following staff

- Kelly Elsethagen, Ecology
- Craig Cameron, EPA and
- Patty Ensign, DOE-RL

**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

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<b>Originated:</b>	05/16/19
<b>Status:</b>	Open
<b>Dispute Extended:</b>	N/A
<b>Action:</b>	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.
<b>Comments:</b>	<p>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 &amp; 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. *Note: the PCHB dispute was dismissed on 04/07/20. 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. <a href="#">At the 01/21/21 IAMIT meeting, there was no change in status.</a></p>
<b>Closed:</b>	---

### ***2. Modifications to TPA Section 9.4, “Administrative Record,” to Eliminate Hard Copy Requirements***

<b>Reference:</b>	TPA Section 9.4
<b>Affected Milestone:</b>	N/A
<b>Originated:</b>	11/15/18 (re-opened)
<b>Status:</b>	Open – Change Control Form P-09-18-01 has been drafted.
<b>Dispute Extended:</b>	N/A
<b>Action:</b>	Sign Change Control Form

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**Comments:** Change Control Form P-09-18-01 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, it 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. At the 02/20/20 IAMIT, the Parties agreed to suspend this discussion until the M-035-09K and M-035-09L disputes are settled, though it will still be tracked at the IAMIT level. At the February 20, 2020 IAMIT meeting, DOE noted the proposed changes to Section 9.4 have some nexus to the M-035-09K dispute. The Parties agreed this item should be placed on hold pending the M-035-09K dispute that is with the Washington State Pollution Control Hearings Board. At the 08/25/20 IAMIT, Ecology stated the Parties will be mediating the M-035-09K dispute on September 28-29, 2020. Mediation session was held

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on September 28-29, 2020. [At the 01/21/21 IAMIT meeting, there was no change in status.](#)

**Closed:** ---

### ***3. Waste Management Area A/AX Closure Process “Kaizen”***

**Reference:** TPA Section 9.4

**Affected Milestone:** TBD

**Originated:** 06/18/20

**Status:** Open –

**Dispute Extended:** N/A

**Action:** Schedule and participate in kaizen

**Comments:** At the 06/18/20 IAMIT meeting, Ecology suggested ORP and Ecology participate in a structured Kaizen to improve the comment/response process between the two agencies and then applying those improvements to the Waste Management Area A/AX regulatory closure. At the 07/16/20 IAMIT meeting, both DOE and Ecology requested EPA participation in the Kaizen. EPA questioned the need to participate as Ecology is the lead regulatory agency for WMA A/AX closure. ORP replied that EPA’s closure process is more streamlined and having EPA share their lessons learned would allow the Parties to find a better solution collectively. EPA has agreed to participate in the Kaizen, which will be limited to no more than three sessions, with each session being no longer than three hours. The parties are working with MSA to identify its participants and to find schedule openings. ORP stated it wanted to wait until the start of the 2021 Fiscal Year (10/01/20) to conduct the Kaizen. At the 09/17/20 IAMIT meeting, the Parties agreed to wait until January 2021 to conduct the Kaizen. MSA has the action to coordinate the logistics and schedule the Kaizen in January 2021. Participants are in pre-planning for the Kaizen. A proposed 01/26/21 workshop to identify documents required for WMA A/AX has been postponed while the parties continue to define scope. [On 01/25/21, the Parties decided to put the Kaizen on hiatus until the scope can be better defined.](#)

**Closed:** ---



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### ***4. Gaps in Deactivation, Decommissioning, Decontamination and Demolition (D4) Planning***

<b>Reference:</b>	ECY letter NWP-20-201 and DOE letter 20-PFD-0013
<b>Affected Milestone:</b>	N/A
<b>Originated:</b>	01/23/20 IAMIT Meeting
<b>Status:</b>	Open
<b>Dispute Extended:</b>	N/A
<b>Action:</b>	Parties are being asked to evaluate DOE's proposed lifecycle soil usage versus D4 versus time.
<b>Comments:</b>	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 2020 IAMIT (to be timed with the RASCAL Team briefing). This will address lifecycle soil usage versus D4 versus time. The IAMIT scheduled for 3/19/20 was cancelled. DOE-RL briefed the IAMIT on 4/16/20, in that briefing, DOE said the on-going Covid-19-related work posture, and pending Hanford prime contract changes may affect this issue and pledged to provide updates. At the 10/15/20 IAMIT meeting, EPA asked DOE-RL if it could provide a rough order of magnitude on the contaminated soil and rubble to inform negotiations and its expectation for "level of detail" on information it would be providing prior to formal discussions. DOE took the action to contact EPA and ECY to discuss D4 planning "level of detail" prior to the next IAMIT meeting. At the 11/19/20 IAMIT meeting, DOE took the action to evaluate the contaminated soil and building rubble strategy, ratio strategy, and integration with the M-091 transuranic waste to coincide with the entire shipping sequence, with respect the inventory. <a href="#">At the 01/21/21 IAMIT there was no change in status, though EPA stressed the importance of this to their agency and was expecting an update soon. DOE agreed to provide an update at the 02/18/21 IAMIT.</a>
<b>Closed:</b>	---

### **TABLE III. RECENTLY CLOSED/OTHER AGREEMENTS**

None