

Inter-Agency Management Integration Team Meeting Minutes
April 16, 2020



SIGNATURES:

Approval:  Date: 5/28/2020
W.F. Hamel, DOE-RL IAMIT Representative

Approval: Robert G. Hastings Digitally signed by Robert G. Hastings
Date: 2020.06.01 12:23:55 -07'00' Date: _____
R.G. Hastings, DOE-ORP IAMIT Representative

Approval: Smith, Alex (ECY) Digitally signed by Smith, Alex (ECY)
Date: 2020.06.02 09:25:15 -07'00' Date: _____
A.K. Smith, Ecology IAMIT Representative

Approval: DAVID EINAN Digitally signed by DAVID EINAN
Date: 2020.06.02 13:47:56 -07'00' Date: _____
D.R. Einan, EPA IAMIT Representative

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); also referred to as the Parties.

This meeting was held remotely via video and telecom utilizing the Microsoft Office Teams software, a communication and collaboration platform because the Washington State Governor issued a “stay-at-home” order due to the COVID-19 (coronavirus) pandemic.

Mission Support Alliance, LLC (MSA) welcomed the IAMIT members and explained this was a standard IAMIT meeting that would cover the agenda items and action tracking table provided in the handout (see attachments).

2.0 REVIEW IAMIT ACTION TRACKING TABLE

2.1 Action Items

2.1.1 Baseline Risk Assessment for Waste Management Area-C

Ecology stated the latest draft IAMIT Determinations for Groundwater Ingestion and Food Chain Pathway continue to be shared between DOE and Ecology. Ecology indicated the Food Chain Pathway was provided to DOE this week for review. Ecology has an internal meeting scheduled for May 4, 2020 to discuss the comments on the Groundwater Ingestion IAMIT Determination and will provide it to DOE for review after the meeting. DOE acknowledged they were reviewing the Food Chain Pathway IAMIT Determination and would respond to Ecology when their review is complete.

2.1.2 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”

At the December 19, 2019 IAMIT, Ecology suggested coordinating or extending milestone M-015-93C to coincide with the M-091 milestones for transuranic waste retrievals. DOE met with the DOE Carlsbad office (Waste Isolation Pilot Plant [WIPP]) the week of February 26, 2020 to discuss shipments and certification of waste. Due to the ongoing coronavirus issue, DOE indicated they will have to check back with WIPP to ensure the base assumptions obtained during the February meeting will still be valid when operations return to normal. DOE has the action to analyze Ecology’s proposal and schedule a meeting with Ecology to discuss it further.

2.1.3 Possible Adoption of the Principles and Parameters in Regulatory Documents

DOE stated that in the latest meeting of the small working group on this topic that Ecology would like to review their internal processes before moving forward. The Parties agreed the small working group would be placed on a temporary hold while Ecology examines their

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processes. After Ecology has performed their review they will inform the working group, who will decide on next steps, up to and including, proceeding with the working group discussions. The working group will continue to report progress to the IAMIT and this item will continue to be tracked at the IAMIT level in the interim.

2.1.4 Changes/Updates to TPA Paragraphs 148/149

The Parties signed the Agreement in Principle (AIP) to negotiate updates to paragraphs 148 and 149. DOE indicated the attorneys held their first meeting last week. These negotiations are ongoing and currently scheduled to conclude on April 30, 2020. The Parties have agreed to extend negotiations. MSA took the action to route the AIP extension for approval to conclude negotiations by July 31, 2020. DOE also took the action to verify meetings are happening and report to the IAMIT.

2.1.5 Gaps in Deactivation, Decommissioning, Decontamination and Demolition (D4) Planning

At the January 23, 2020 IAMIT meeting, DOE took the action to brief EPA and Ecology at the March 19, 2020 IAMIT. The March IAMIT was cancelled. Today, DOE provided an update to the IAMIT on ongoing efforts to address lifecycle soil usage versus debris over time. This briefing was meant to be provided and coincide with the Representative Analogous Waste Site Coordinating Agency Liaisons (RASCAL) Team briefing noted in Section 3.1 below.

DOE stated they have been working on D4 planning for the past several months and it is taking more time because it is a very involved task. DOE is looking at the lifecycle baseline data and pulling out the actual estimates for the waste sites and buildings to provide the volumes of wastes to be disposed of at the Environmental Restoration Disposal Facility (ERDF). DOE has some preliminary information, including a histogram that shows disposal volumes over the next couple of years. The graph is mostly flat in the near term because there is not a lot of volume going into ERDF. However, in 2026, dependent upon funding, disposal at ERDF is projected to increase. The disposal at ERDF is disproportionate to the volume of soil sites compared to the amount of the debris being disposed of at ERDF. DOE pointed out that their sources of contaminated soil for fill were based on an outdated lifecycle baseline. DOE mentioned that due to the coronavirus issue, it may be too early to come back to the IAMIT and talk about more of the results they are finding in this review. However, when the site returns to normal operations, the data will be more representative to review and discuss further with the IAMIT.

Ecology wanted to confirm with DOE that disproportionate meant that DOE is going to generate a lot more soil than debris. DOE confirmed this but they need to verify that is accurate because there is such a big delta between the soil and debris volumes. Ecology stated they are looking forward to seeing those numbers. DOE stated the coronavirus situation and the imminent change of Hanford prime contracts may cause delays in developing a path forward. This item will be tracked at the IAMIT level in the interim.

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2.1.6 IAMIT Determination – Delete Audio Files of Meetings Upon Approved Meeting Minutes

There is an ongoing issue involving “legal holds” prohibiting the deletion of material relevant to ongoing TPA disputes, which needs to be resolved. DOE took the action to discuss this further with Ecology.

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, 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. This item will be tracked at the IAMIT level in the interim.

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

At the November 21, 2019 IAMIT, the Parties agreed the draft AIP should be placed on hold pending results of the “Representative Analogous Waste Site Coordinating Agency Liaisons (RASCAL)” team briefing and path forward. The RASCAL team provided a briefing to the IAMIT (see attached presentation and discussion provided in Section 3.1 below). This item will be tracked at the IAMIT level in the interim.

2.2.3 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 currently with the Washington State Pollution Control Hearings Board. This item will be tracked at the IAMIT level in the interim.

Ecology noted the Parties should consider making permanent changes to the TPA Legal Agreement, Part Five, Common Provisions, Article XXXIII, Notification requirements in paragraphs 108 and 109, based on the approved IAMIT Determination 2020-003, to temporarily suspend these requirements. Ecology also suggested this change be consolidated with the Section 9.4 change and go out for public comment. DOE indicated these changes would take a fair amount of time to complete and suggested a meeting be held to discuss this further and ensure the Parties are aligned before pursuing the changes. DOE took the action to schedule a meeting to discuss this further with Ecology and EPA.

3.0 IAMIT PRESENTATION

3.1 Path Forward for Accelerating Cleanup Decision for Central Plateau Waste Sites – Representative Analogous Site Coordinating Agency Liaisons (RASCAL) Team Presentation

Ecology provided the second RASCAL Team update to the IAMIT (see attachment for presentation). The RASCAL Team was formed to develop a path forward for accelerating cleanup decisions for Central Plateau waste sites. The RASCAL Team first briefed the IAMIT on November 21, 2019. This briefing discussed how the RASCAL Team plans to implement the early response actions, accelerate cleanup decisions while ensuring consistent remedies for similar waste sites (i.e., similar waste site issues, similar remedies), reduce characterization for the pre-Record of Decision (ROD), and potentially modify and reduce characterization post-ROD. The process highlighted an early action option of separating the 200-BC-1 Operable Unit, for the BC Cribs and Trenches, because it does not need further pre-ROD characterization like parts of the 200-WA-1 or 200-EA-1 Operable Units do. This RASCAL process will create cost, schedule, and characterization savings by creating a new 200-IA-1 early action operable unit, and schedule savings for the 200-EA-1 and 200-WA-1 operable unit work plans' pre-ROD characterization.

Ecology stated the next steps for the RASCAL team would consist of:

- Completing a process description white paper to include waste site binning into Conceptual Site Model (CSM) groups,
- Finalizing waste site profiles and response decision criteria,
- Defining implementation sequencing and process benefits,
- Proceeding with the Focused Feasibility Study and Proposed Plan for CSM Group 1 as a new operable unit (200-IA-1), and
- Revising interim milestones.

Ecology asked if the RASCAL Team has discussed the public involvement aspect of this process. The RASCAL Team said that was a very good point; however, it is too soon in the process to discuss because the RASCAL Team is trying to get concurrence from the Parties to proceed with the next steps in executing this work.

DOE acknowledged this was the conceptual phase of the process and stated before any execution of work could be considered, they would like to see a cost profile to include resources needed, schedule, and durations, to include the document phase to work phase. Specifically, DOE stated they preferred to hold on the Focused Feasibility Study and Proposed Plan aspects of this process until they have evaluated the cost and schedule associated with the overall work scope.

DOE stated this process will also play a role in the D4 planning with the soil versus debris discussion. The D4 planning effort will also need to account for RASCAL cost and schedule and fold this aspect into planning, along with the new contract, task orders and end states DOE will be establishing (see Section 2.1.5 above).

EPA highlighted the RASCAL project was meant to streamline processes and they did not want to lose sight of the milestones that have funding issues and will need to be renegotiated holistically as part of this process.

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The RASCAL team asked the IAMIT to agree to proceed with their proposed next steps. The IAMIT agreed the RASCAL team could proceed with the following and report to the IAMIT in a couple of months:

- Draft a white paper, and
- Engage the contractor for a cost estimate to include cost avoidance and proposed milestones.

3.2 Cumulative Impact Evaluation Expert Panel Report and Responses to EPA and Ecology Comments

DOE stated they had received comments on the Cumulative Impact Evaluation (CIE) from the peer review panel, Ecology, EPA, and the U.S. Geological Survey (USGS). The CIE team is currently addressing those comments, updating, and rewriting parts of Technical Approach Document (TAD). Specifically, DOE is incorporating comments into Chapter 3, Vadose Zone and Chapter 4, Saturated Zone. DOE is anticipating completing development of a Review Comment Record, which includes proposed responses to comments and how they are addressing those comments, by the end of May or beginning of June 2020.

Ecology asked DOE how they were going to respond to some of the major comments regarding the historical calibration, credibility, and confidence buildup. DOE responded that they are further along in the development into calibration and confidence building. There have been a number of efforts, for example, the Plateau to River (P2R) model, which has been revised several times, and the vadose zone is going through three-dimensional modeling on a large scale on the Central Plateau. DOE has considered those comments. Some were very constructive and they are trying to implement them. Others would require very large efforts and they would not recommend pursuing those approaches at this time. Ecology responded by stating the other approaches may be implemented eventually, as they are good points and cautioned DOE not to completely discard them.

Ecology inquired about DOE's process of incorporating and responding to comments by modifying the TAD and how Ecology would be involved in the development of DOE's official responses in the Review Comment Record. DOE responded that they plan to work with Ecology and EPA collaboratively.

EPA noted they are continuing to keep the USGS involved. EPA provided the USGS a copy of the P2R report. The USGS are involved in and will continue to provide technical assistance as this tool is developed.

4.0 UPCOMING TOPICS/ACTION ITEMS FOR FUTURE IAMIT MEETINGS

There were no new topics proposed by the IAMIT.

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 mission essential operations currently ongoing due to the coronavirus situation and change of Hanford prime contracts.

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The RASCAL Team took the action to update the IAMIT on the proposed path forward for accelerating a cleanup decision for Central Plateau waste sites in a couple months. This time provides the RASCAL Team the ability to draft the white paper and engage the contractor for a cost estimate to include cost avoidance and proposed milestones.

5.0 REVIEW OF TODAY’S ACTIONS/UPCOMING IAMIT MEETINGS

The following actions were captured during the meeting and provided to the Parties following this IAMIT meeting:

| No. | IAMIT Topic | Actions from 4/16/20 IAMIT Meeting |
|-----|---|---|
| 1 | Baseline Risk Assessment for WMA-C IAMIT Determinations | DOE is currently reviewing the Food Chain Pathway IAMIT Determination. Ecology is still working on the latest version of the Groundwater Ingestion IAMIT Determination and will provide it to DOE for review. |
| 2 | 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” | DOE took the action to analyze Ecology’s proposal for milestone M-091 and schedule a meeting with Ecology to discuss it further. |
| 3 | Possible Adoption of the Principles and Parameters in Regulatory Documents | Ecology has the action to evaluate their internal processes. After Ecology has performed their review, they will inform the IAMIT and the IAMIT can decide at that time, to proceed with the working group discussions. |
| 4 | Changes/Updates to TPA Paragraphs 148/149 | MSA took the action to route the AIP extension for approval to conclude negotiations by July 31, 2020. DOE also took the action to verify meetings are happening and report to the IAMIT. |
| 5 | IAMIT Determination – Delete Audio Files of Meetings Upon Approved Meeting Minutes | DOE took the action to discuss this further with Ecology. |

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| No. | IAMIT Topic | Actions from 4/16/20 IAMIT Meeting |
|-----|---|---|
| 6 | TPA Legal Agreement Article XXXIII, Notification Requirements (paragraphs 108 and 109) | DOE took the action to schedule a meeting to discuss this further with Ecology and EPA. |
| 7 | Path Forward for Accelerating Cleanup Decision for Central Plateau Waste Sites – Representative Analogous Site Coordinating Agency Liaisons (RASCAL) Team | RASCAL Team was granted IAMIT approval to proceed with next steps: (1) Draft a white paper, and (2) Engage the contractor for a cost estimate, to include cost avoidance and proposed milestones. |

The next IAMIT meeting is scheduled for May 21, 2020.

6.0 LIST OF ATTENDEES

| | |
|--------------------|--|
| Barrett, William | CHPRC |
| Bergman, Theresa | CHPRC |
| Brasher, Stephanie | MSA |
| Cameron, Craig | EPA |
| Cline, Michael | DOE |
| Dahl, Suzanne | Ecology |
| Davis, Scott | MSA |
| Doornbos, Martin | CHPRC |
| Einan, Dave | EPA |
| Fleming, Sheila | EPA |
| Fox, Randal | CHPRC |
| Freedman, Vicky | PNNL |
| French, Mark | DOE |
| Frohling, Elise | Ecology |
| Goswami, Dib | Ecology |
| Hamel, Bill | DOE |
| Hanson, James | DOE |
| Hastings, Rob | DOE |
| Higgins, Kathy | DOE |
| Hildebrand, Doug | DOE |
| Kytola, Kevin | DOE Consultant with Sapere Consulting Inc. |
| Lobos, Rod | DOE |
| Lyon, Jeff | Ecology |
| Menard, Nina | Ecology |
| Nickola, Karin | CHPRC |
| Price, John | Ecology |
| Seeley, Paul | DOE |

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| | |
|-----------------|---------|
| St. John, David | CHPRC |
| Temple, John | Ecology |
| Turner, Michael | MSA |
| Welsch, Kim | Ecology |
| Wend, Chris | Ecology |



**Inter-Agency Management Integration Team (IAMIT) Meeting
Thursday April 16, 2020, 8-9:30 a.m.**

*Meeting held via teleconference

Agenda

| No | Time | Lead / Org | Topic |
|-----------|------------------|---|---|
| 1 | 8:00 – 8:02 a.m. | Michael Turner, MSA | Welcome and Meeting Logistics/Format |
| 2 | 8:02 – 8:20 a.m. | Michael Turner, MSA/ IAMIT and attendees | Review IAMIT Action Tracking Table |
| 3 | 8:20 – 8:50 a.m. | D. Hildebrand, DOE C. Cameron, EPA N. Menard, ECY | Representative Analogous Site Coordinating Agency Liaisons (RASCAL) Team Presentation |
| 4 | 8:45-9:00 a.m. | Mark French, DOE-RL | Gaps in Planning Deactivation, Decommissioning, Decontamination and Demolition (D4) Projects - Addressing Life cycle Soil Usage Versus D4, Versus Time |
| 5 | 9:00 – 9:10 a.m. | D. Hildebrand, DOE-RL | Update on Cumulative Impact Evaluation Expert Panel Report and Responses to EPA and Ecology Comments |
| 6 | 9:10 – 9:20 a.m. | IAMIT members | New Topics for Upcoming IAMIT Meetings |
| 7 | 9:20-9:30 a.m. | Michael Turner, MSA/ IAMIT members | Review of Today's Actions |
| 8 | 9:30 a.m. | Adjourn | |

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Table I. Action Items¹

| 1. Baseline Risk Assessment for WMA-C |
|---|
| <p>Reference: Phase II RCRA Facility Investigation for Waste Management Area C (RPP-RPT-58339)</p> <p>Affected Milestone: M-045-61 (completed)/TPA Appendix I</p> <p>Originated: 02/21/19</p> <p>Status: Open</p> <p>Dispute Extended: N/A</p> <p>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</p> <p>Comments: Presentations were given by Ecology and DOE at the 02/21/19 IAMIT. There was no change in status at the 03/21/19 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 have been drafted and are with the IAMIT for review. 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. IAMIT is still tasked with resolving the remaining two issues (Groundwater Ingestion and Food Chain Pathway). The parties must also determine whether the Baseline Risk Assessment is a TPA Primary or Secondary Document. At the 07/18/19 IAMIT, the parties agreed to a "core" IAMIT meeting to discuss the Groundwater Ingestion and Food Chain Pathway further. MSA took the action to schedule the meeting. Parties have yet to agree to a date. Ecology noted their staff was reviewing the Judgmental Samples and Hazard Index IAMIT Determinations. At the 08/15/19 IAMIT, Ecology stated that they were still reviewing the draft IAMIT Determinations for Judgmental Samples and Hazard Indices. At the 10/17/19 IAMIT, Ecology committed to reviewing the language in the Hazard Index IAMIT Determination (#2019-005) and Judgmental Samples IAMIT Determination (#2019-006) for the BRA WMA-C by the November 2019 IAMIT meeting. Ecology also committed to scheduling an internal meeting with Ecology staff to discuss the two remaining issues (Groundwater Ingestion and Food Chain Pathway) and then talk about the outcome with the November IAMIT. A "stand-alone" IAMIT meeting to discuss the Groundwater Ingestion and Food Chain Pathway issues is scheduled for 11/21/19. At the 11/21/19 stand-alone IAMIT meeting on this subject, the parties agreed to sign IAMIT Determinations on Judgmental Samples and Hazard Index (signed 11/25/19). The two remaining issues - Groundwater Ingestion and Food Chain Pathway remain open, though ORP has drafted IAMIT Determinations on these issues, which are in review by the parties. On 12/19/19, draft versions of the two IAMIT Determinations were exchanged between the parties. On 12/20/19, Ecology asked for a meeting to discuss. At the 1/23/20 IAMIT, the Parties stated they had met, have exchanged drafts and are close to agreement on remaining two IAMIT Determinations. At the 02/20/20 IAMIT meeting, Ecology indicated the Food Chain Pathway IAMIT Determination was provided to DOE, but they are still working on the GW Ingestion IAMIT Determination.</p> <p>Closed: <i>Partial closure:</i> Hazard Index IAMIT Determination (#2019-005) and Judgmental Samples IAMIT Determination (#2019-006) were signed 11/25/19.</p> |

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2. 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 Milestone: 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). On 05/16/19, the Parties agreed not to issue the Director’s Determination extension and work resolution via the budget AIP and TA.

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

Comments: 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). On 05/16/19, the Parties agreed not to issue the Director’s Determination extension and work resolution via the budget AIP and TA. 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 this dispute. On 07/03/19 Ecology noted it would not sign the AIP until it received a response to its letter of 07/10/19 (19-NWP-109). 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. On 09/09/19, DOE-RL requested Ecology’s reconsideration in approving the AIP to begin negotiating the milestones impacted by the FFY 2018 and 2019 budget via letter 19-AMRP-0074. At the 11/21/19 IAMIT, Ecology noted they have requested a briefing from DOE on the FY20 Continuing Resolution (CR) impacts (in accordance with TPA Legal Agreement, paragraph 149.F). DOE reported they have scheduled the FY19 year-end accomplishments briefing and then will schedule an Integrated Priorities List follow-on briefing which will include FY20 CR impacts. At the 12/19/19 IAMIT, Ecology suggested coordinating milestone M-015-93C (Characterize field work for 200-SW-2 Operable Unit) with the M-091 milestone for retrievals. DOE is currently evaluating options, including scheduling a meeting with Ecology to discuss. The agencies have agreed to remove this milestone from the budget AIP. [DOE met with the Carlsbad Field Office \(WIPP\) in late February and will schedule a meeting with Ecology to discuss options and a potential path forward.](#)

Closed: —

¹ *New information shown in [blue](#).

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3. Possible Adoption of the Principles and Parameters in Regulatory Documents

Reference: DOE/RL-2004-60, REV.1

Affected Milestone: N/A

Originated: 05/16/19

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to consider adopting the Principles and Parameters for use as a standard in producing regulatory documents.

Comments: IAMIT has agreed to discuss this topic as a "core" IAMIT meeting. No meeting date set. On 6/20/19, Ecology stated they needed to discuss this internally and discuss and would report status at the 07/18/19 IAMIT meeting. At the 07/18/19 IAMIT meeting the parties agreed to refer to this topic as the "Principles and Parameters" and the parties agreed to add this topic to a future regularly scheduled IAMIT meeting to discuss further. At the 08/15/19 IAMIT meeting, the parties agreed to address this issue in a stand-alone, topic-specific IAMIT meeting. MSA took the action to schedule that meeting. Parties have yet to agree on a date for this meeting. At the 10/17/19 IAMIT, the parties agreed to discuss this subject and path forward at the November IAMIT. The parties also discussed the possibility of assembling a small group to evaluate the principles and parameters and then bring a recommendation back to the IAMIT. At the 11/21/19 IAMIT, the parties agreed to form a small working group, made up of each agency's subject matter experts to discuss and eventually bring their conclusions to the IAMIT. At the 12/19/19 IAMIT, the agencies were asked to identify SME's to form a small working group. Agencies have identified SME's, the team will consist of:

- Craig Cameron, EPA
- John Price, ECY
- Doug Hildebrand, RL
- Rod Lobos, ORP

First meeting of the group occurred 01/23/20. Affected milestones and work plans were discussed as well as a potential IAMIT Determination to document conclusions. [Second meeting of the group was held 03/09/20. At that meeting, Ecology handed out a draft letter that parameters \(cleanup standards\) be applied to Waste Management Areas through the CERCLA and RCRA/MTCA processes. Parties met again on 4/09/20 and are still developing a path forward.](#)

Closed: --

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4. 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 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 \[Parties signed the AIP to begin negotiations, which are currently scheduled to conclude 4/30/20. The Parties have been provided a draft extension that would extend negotiations until July 31, 2020.\]\(#\)](#)

Closed: —

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5. Gaps in Deactivation, Decommissioning, Decontamination and Demolition (D4) Planning

Reference: ECY letter NWP-20-201 and DOE letter 20-PFD-0013

Affected Milestone: N/A

Originated: 01/23/20 IAMIT

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to evaluate DOE's proposed lifecycle soil usage versus D4 versus time.

Comments: 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. Planning to brief IAMIT on 4/16/20.

Closed: —

6. IAMIT Determination— Delete Audio Files of Meetings Upon Approved Meeting Minutes

Reference: N/A

Affected Milestone: N/A

Originated: 02/20/20 IAMIT

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to sign an IAMIT Determination allowing for audio files of TPA meetings to be destroyed (deleted) upon signed, approved meeting minutes.

Comments: MSA uses audio recordings of certain TPA meetings as an aid in producing meeting minutes. In accordance with DOE Records Administrative Schedule 2.1.22, Records Exclusively for Transcription, the instruction reads as follows: "Recordings of meetings made exclusively for note taking or transcription, EXCLUDING recordings of proceedings of Presidential commissions and other executive commissions. Destroy immediately after use." Therefore, the audio files will be deleted after obtaining approval of the TPA meeting minutes. However, any audio files subject to a "Legal Hold" will be retained until the Legal Hold Notice has been terminated.

Closed: —

Inter-Agency Management Integration Team Decision Table/Action Tracking

April 16, 2020

Table II. Status Updates

| 1. Draft Agreement in Principle: Revising and Updating TPA Appendices H and I |
|--|
| <p>Reference: Tri-Party Agreement Action Plan, Appendices H and I</p> <p>Affected Milestone: M-042-00 and M-045-00 series</p> <p>Originated: 05/16/19</p> <p>Status: Open</p> <p>Dispute Extended: N/A</p> <p>Action: 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.</p> <p>Comments: 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 & 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. 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. At the last held IAMIT (02/20/20), there was no change in status.</p> <p>Closed: —</p> |
| 2. Agreement in Principle for the Negotiation of HFFACO Revisions in Response to Federal Fiscal Year (FFY) 2018 Appropriation and FFY 2019 President's Budget |
| <p>Reference: N/A</p> <p>Affected Milestone: M-015-84, M-015-91B, M-015-92C, M-015-93B, , M-015-98, M-015-99, M-015-112, M-016-255, M-016-256, M-085-70 (currently in dispute at the PM level), M-085-80</p> <p>Originated: 12/20/18</p> <p>Status: Open - Agreement in Principle (AIP) and corresponding Tentative Agreement (TA) has been drafted</p> <p>Dispute Extended: N/A</p> <p>Action: Sign Agreement in Principle, enter into negotiations</p> <p>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</p> |

Inter-Agency Management Integration Team Decision Table/Action Tracking

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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 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. 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. [Those conclusions will be briefed to the IAMIT on April 16, 2020.](#)

* See 11/21/19 IAMIT meeting minutes for RASCAL team presentation.

Closed: —

Inter-Agency Management Integration Team Decision Table/Action Tracking

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

Reference: TPA Section 9.4

Affected Milestone: N/A

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

Status: Open - Change Control Form P-09-18-01 has been drafted.

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 (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 dispute is settled, though it will still be tracked at the IAMIT level.

Closed: —

Table III. Recently Closed/Other Agreements

None.

THE HANFORD SITE

A Path Forward for Accelerating Cleanup Decisions for Central Plateau Waste Sites

RASCAL Team Presentation to IAMIT

April 16, 2020

-
- RASCAL Objectives
 - Update November 2019 IAMIT Next Steps
 - Early Response Actions
 - Remedial Investigation/Feasibility Study (RI/FS) Work Plan (WP) Modifications
 - Timeline Considerations
 - Process Framework Status
 - IAMIT April 2020 Agreement on Next Steps
 - Questions

- Implement early actions
- Accelerate cleanup decisions
- Ensure consistent remedies for similar sites
 - Similar site issues
 - Similar remedies
- Reduce characterization pre-Record of Decision (ROD)
- Modify and potentially reduce characterization post-ROD

- Identify select sites for early response actions
- Complete process framework
- Identify necessary modifications to 200-EA-1 and 200-WA-1/200-BC-1 RI/FS WPs, including timeline
- Discuss and propose implementation milestones
- Document in IAMIT form and gain agreement at April IAMIT meeting

- Conceptual Site Model (CSM) Group 1: Shallow and easily accessible waste sites
 - 116 waste sites assigned to 200-WA-1 and 200-EA-1 OUs
 - Removal, Treatment, and Disposal (RTD) bias
 - New Inner Area (IA) Operable Unit (OU)
 - Joint lead with EPA and Ecology
 - Propose 200-IA-1 OU
 - Immediately initiate Focused FS (FFS) and Proposed Plan (PP)
 - Alternatives: No Action, RTD
 - Define plug-in language for future use
 - Final ROD & Remedial Action Work Plan (RAWP)
 - Implemented by geographic area
-

- Continue removal actions on 200-MG-1 and 200-MG-2
 - Confirmatory sampling/ No Further Action (CS/NFA)
 - RTD
 - Proceed with Outer Area waste sites under existing AMs
 - Transition Inner Area waste sites upon new OU ROD
 - Initiate remedial actions under new OU
 - Accelerate 200-BC-1 to FFS, PP, ROD, RAWP
 - No additional characterization needs
 - Consider early remedial actions for U Plant waste sites
-

-
- Reminder: 200-EA-1 & 200-WA-1/200-BC-1 OU WPs
 - Describe RASCAL process framework
 - CSM groups and representative waste sites
 - Analogous waste site post-ROD confirmatory sampling
 - Decision process for post-ROD sampling
 - Modify Sampling and Analysis Plans to remove analogous waste site characterization
 - Update schedules to reflect process framework and revising interim milestones
 - Incorporate new 200-BC-1 path forward
-

- Complete process description white paper
 - Complete waste site binning into CSM groups
 - Finalize waste site profiles and response decision criteria
 - Define implementation sequencing and process benefits
- Revise interim milestones

CSM Groupings Status

| Conceptual Site Model Groups | Conceptual Site Model Groups Descriptions | Number of Sites* | Number of SQUIDS |
|------------------------------|---|------------------|------------------|
| 1 | Shallow early action sites | 116 | 40 |
| 2 | Deep only sites | 5 | 3 |
| 4 | Small to medium plutonium sites | 4 | 3 |
| 6 | Shallow and deep sites | 128 | 36 |
| 7 | Unique sites | 64 | 24 |
| Total | NA | 317 | NA |
| *Draft work in progress | | | |

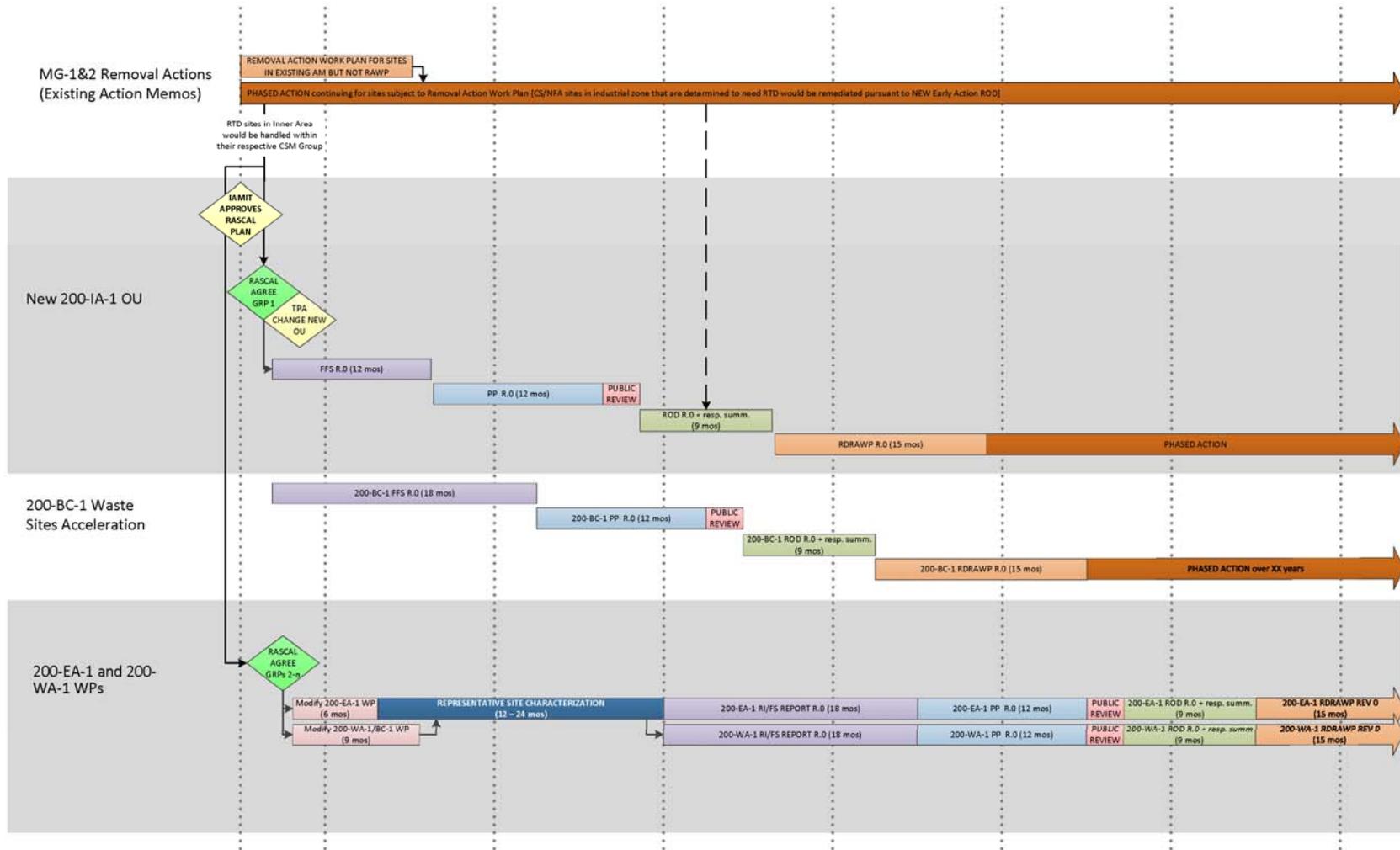
Site Profile and Response Decision Criteria

| Conceptual Site Model Group 1: Shallow | Conceptual Site Model Groups 4, 6, and 7: Intermediate | Conceptual Site Model Groups 2: Deep | Conceptual Site Model Group 4, 6, and 7: Shallow and Intermediate | Conceptual Site Model Group 6: Intermediate and Deep | Conceptual Site Model Group 6: Shallow, Intermediate and Deep |
|---|--|---|---|---|--|
| Surface to 15 ft bgs | Surface to 15 ft bgs | Surface to 15 ft bgs | Surface to 15 ft bgs | Surface to 15 ft bgs | Surface to 15 ft bgs |
| 15 ft to 70 ft bgs | 15 ft to 70 ft bgs | 15 ft to 70 ft bgs | 15 ft to 70 ft bgs | 15 ft to 70 ft bgs | 15 ft to 70 ft bgs |
| 70 ft to GW | 70 ft to GW | 70 ft to GW | 70 ft to GW | 70 ft to GW | 70 ft to GW |

| |
|--|
| <p>Conceptual Site Model Group 1: Shallow</p> <p style="background-color: #f2f2f2; text-align: center;">Surface to 15 ft bgs</p> <p style="text-align: center;">15 ft to 70 ft bgs</p> <p style="text-align: center;">70 ft to GW</p> |
| <p>Potential HH, Eco, and GW exposure pathway.</p> <p>IF no leachability concern, THEN</p> <ul style="list-style-type: none"> - Soil cover to break HH/ECO pathway; OR - RTD to Industrial Worker and Eco PRGs <p>IF leachability concern (i.e., COC > GW protection PRGs) THEN</p> <ul style="list-style-type: none"> - RTD to industrial worker, eco, and GW protection PRGs; OR - Cap; OR - Insitu stabilize |
| <p>Representative Site(s):</p> |

DRAFT

Timeline Considerations



- RASCAL process will create cost, schedule, and characterization savings
 - New 200-IA-1 Early Action OU
 - Bias towards remediation will reduce pre-ROD characterization
 - Accelerated implementation of final remedy
 - Schedule savings for 200-EA-1 and 200-WA-1 OU WP pre-ROD characterization
 - Pre-ROD field work schedule savings of ~50%
 - Reduced characterization sampling needs through representative and analogous approach
 - Use of confirmatory sampling for analogous site profiles will reduce data needs

- Concurrence to proceed
 - Complete process description white paper
 - Complete waste site binning into CSM groups
 - Finalize waste site profiles and response decision criteria
 - Define implementation sequencing and process benefits
 - Proceed with FFS & PP for CSM Group 1 as new OU
 - Revise interim milestones
- RASCAL vision for reaching formal IAMIT agreement
 - White paper will support an IAMIT agreement
 - Consider revised interim milestone proposals
- Prioritize resources and funds supporting this process

Questions



MG-1&2 Removal Actions
(Existing Action Memos)

REMOVAL ACTION WORK PLAN FOR SITES
IN EXISTING AM BUT NOT RAWP

PHASED ACTION continuing for sites subject to Removal Action Work Plan [CS/NFA sites in industrial zone that are determined to need RTD would be remediated pursuant to NEW Early Action ROD]

RTD sites in Inner Area
would be handled within
their respective CSM Group

IAMIT
APPROVES
RASCAL
PLAN

RASCAL
AGREE
GRP 1
TPA
CHANGE NEW
OU

New 200-IA-1 OU

FFS R.O (12 mos)

PP R.O (12 mos)

PUBLIC
REVIEW

ROD R.O + resp. summ.
(9 mos)

RDRAWP R.O (15 mos)

PHASED ACTION

200-BC-1 Waste
Sites Acceleration

200-BC-1 FFS R.O (18 mos)

200-BC-1 PP R.O (12 mos)

PUBLIC
REVIEW

200-BC-1 ROD R.O + resp. summ.
(9 mos)

200-BC-1 RDRAWP R.O (15 mos)

PHASED ACTION over XX years

200-EA-1 and 200-
WA-1 WPs

RASCAL
AGREE
GRPs 2-n

Modify 200-EA-1 WP
(6 mos)

Modify 200-WA-1/BC-1 WP
(9 mos)

REPRESENTATIVE SITE CHARACTERIZATION
(12 – 24 mos)

200-EA-1 RI/FS REPORT R.O (18 mos)

200-EA-1 PP R.O (12 mos)

PUBLIC
REVIEW

200-EA-1 ROD R.O + resp. summ.
(9 mos)

200-EA-1 RDRAWP REV 0
(15 mos)

200-WA-1 RI/FS REPORT R.O (18 mos)

200-WA-1 PP R.O (12 mos)

PUBLIC
REVIEW

200-WA-1 ROD R.O + resp. summ.
(9 mos)

200-WA-1 RDRAWP REV 0
(15 mos)

