



**Inter-Agency Management Integration Team (IAMIT)
Meeting Minutes
July 19, 2018**

Approval: *A.K. Smith* Date: 8/15/18
A.K. Smith
Ecology IAMIT Representative

Approval: *J.R. Franco* Date: 8/7/18
J.R. Franco
BOE-RL IAMIT Representative

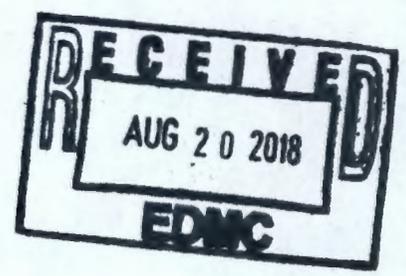
Approval: *G.D. Trenchard* Date: 8-10-18
G.D. Trenchard
DOE-ORP IAMIT Representative

Approval: *D.R. Einar* Date: 8/16/18
D.R. Einar
EPA IAMIT Representative

Minutes Prepared by: *M.J. Turner* Date: 7/26/18
M.J. Turner
Mission Support Alliance

200-BP-5
200-PD-1

m-037-10
m-091-47D



**Inter-Agency Management Integration Team (IAMIT)
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July 19, 2018**

**1) Topic: Review IAMIT Action Tracking Table
(See Handout)**

Table I. Actions Items

- A) Mass Loading Factor (MLF) vs. Applicability of Particulate Emission Factor (PEF) for Calculating Soil Inhalation Cleanup Levels – The IAMIT signed a Determination which allows for the use of the U.S. Environmental Protection Agency’s (EPA) particulate emission factor for calculating soil cleanup levels or preliminary remediation goals. MSA will add the IAMIT Determination to the Hanford Administrative Record. This action was closed.
- B) 200-BP-5 and 200-PO-1 Interim Action Record of Decision – The IAMIT signed a Determination noting that the Parties had come to agreement on pursuing an Interim Action Record of Decision (ROD) for the 200-BP-5 and 200-PO-1 groundwater operable units (OU). The strategy also calls for a final ROD for these OUs to be developed after contaminant sources are adequately characterized. MSA will add the IAMIT Determination to the Hanford Administrative Record. This action was closed.
- C) PUREX Closure Plan, Part A – The Washington State Department of Ecology (Ecology) stated that if the Department of Energy (DOE) does not appeal the summary judgment of the Pollution Control Hearings Board by July 26, 2018, they would sign the Surveillance & Maintenance PUREX dispute meeting minutes. This action remains open.

Table II. Status Updates

- A) TPA Five-Year Review – MSA stated that there were no new updates to this action. Major changes to Appendices H and I are still planned, as well as a revision to Section 5.5. In addition, TPA Paragraphs 148/149 are still targeted for a revision. On Paragraphs 148/149, the Parties agreed that their respective legal representatives should meet to revisit potential changes. This action remains open.
- B) Milestone M-037-10/Closure Actions for Five Specified TSDs – MSA stated that this action is associated with TPA Section 5.5 and addressing TSD units inside of an operable unit. Ecology stated that the EPA and Ecology project and legal staff have been discussing the issue, and that DOE had received four changes from Ecology that are currently under review. This action remains open.

Table III. Recently Closed/Other Agreements

- A) Hanford Advisory Board (HAB) Request to Attend TPA Quarterly Milestone Review and Project Manager Meetings – MSA stated that, based on the decision by the IAMIT to not extend an invitation to the HAB to attend Tri-Party Agreement Project Manager and Quarterly Milestone Review meetings. A response was made to the HAB in person by DOE-Office of River Protection Communications Director, and though the HAB was disappointed in the decision, it understood. This action was closed.
 - B) All-Electronic Administrative Record (AR) – MSA noted that this action is pending upgrades to the AR, which will take about a year. The action will be revisited upon completion of MSA's AR upgrade. This action was closed.
- 2) **Topic: Other**
- A) M-091-47D Agreement in Principle Extension (AIP) – The Parties signed an extension of an AIP to continue formal negotiations on M-091-47D, a milestone calling for DOE to certify or treat 280 cubic meters of transuranic mixed waste (TRUM) and mixed low level waste (MLLW). The Parties now have until October 1, 2018 to complete negotiations.

Inter-Agency Management Integration Team Decision Table/Action Tracking

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*New information shown in blue

Table I. Action Items

1. Particulate Emission Factor for Calculating Soil Cleanup Levels for the Inhalation Pathway

Reference:

Affected Milestones: N/A

Originated: 3/15/18

Status: Open

Dispute Extended: N/A

Action: The IAMIT is being asked to make a decision about whether it should come before the IAMIT to make a determination regarding the future use of the Particulate Emission Factor (PEF) method and value to calculate soil cleanup levels

Comments: Since 2015, DOE and Ecology have debated the use of the PEF to calculate soil cleanup levels. This on-going debate impacts multiple projects, including the RCRA Permit, Rev. 9 process; and the 200-EA-1 RI/FS and RFI/CMS work plan.

Closed:

2. 200-BP-5 and 200-PO-1 Interim Action Record of Decision (IROD)

Reference: DOE/RL-98-35, Rev. 3

Affected Milestones: N/A

Originated: 5/10/18

Status: Open

Dispute Extended: N/A

Action: Sign IAMIT Determination

Comments: Considering that the source investigations are not complete, the Parties are agreeing that the necessary information is not available to prepare a Feasibility Study to support a final (non-interim) ROD for the groundwater OUs. So the Parties are pursuing an IROD for the groundwater OUs to expedite the remediation of some groundwater contaminant plumes and coordinate with actions at C Farm. The Parties agree that a final (non-interim) ROD for the 200 East Area groundwater OUs will be developed after contaminant sources are adequately characterized.

Closed:

3. PUREX Closure Plan, Pt. A

Reference: DOE/RL-98-35, Rev. 3

Affected Milestones: N/A

Originated: 3/30/17

Status: Open

Dispute Extended: N/A

Action: 1) DOE-RL will send a letter to Ecology stating the agreement that the pre-closure plan will substitute for the closure plan until a closure plan template is developed. The letter will include other facilities that are operating under the same situation as PUREX - Completed 7/3/17, reference DOE-RL letter 17-AMRP-0202.

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2) Ecology will respond to DOE-RL's letter accepting the agreement. Completed 7/25/17, reference Ecology letter 17-NWP-090.

3) Ecology provided language for closure plan "Option 2". Review in progress with DOE

4) DOE-RL will develop a draft CERCLA-linked closure plan to meet Rev. 9 permit requirements.

5) DOE-RL will place the revised closure plan in the operating records to replace the existing pre-closure plan.

Comments: PUREX Dispute closed on 3/30/2017. Meeting minutes are in review with comments left to be resolved. Ecology will not be signing meeting minutes in light of Notice of Penalty incurred on 08/31/17, but will address the issue after the appeal of the NOP on 6/19 -6/20 of 2018.

Closed:

Table II. Status Updates

1. TPA Five-Year Review – Status

Reference: TPA Article XXXVIII

Affected Milestones: N/A

Originated: N/A

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

Dispute Extended: N/A

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

Comments: Ten TPA Class II Change Control Forms were signed at the August 17, 2017 IAMIT meeting. One Class I Change Control Form was signed at the ECY Director and EPA Regional Administrator level. One Class I Change Control Form was disapproved by EPA.

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

Notes: The TPA agencies have determined the changes to the TPA were "not significant" and thereby not subject to public comment. A reprint decision of the TPA has been postponed to late Fall pending changes to the above-mentioned sections of the TPA meeting agreement by the parties.

The Parties have committed to continuing talks on other potential changes to the TPA, notably Appendices H, I, Section 11.8 and Paragraphs 148/149. Pending the outcome of these potential changes, a decision to re-print the TPA will be made. As of December 14, 2017 IAMIT, no change in the status, however it was determined that both Ecology and EPA Legal should be involved in the 148/149 discussions and that potential changes to TPA Appendices H and I may be included in the scope of the "System Plan" negotiations, which resumed January 17, 2018. System Plan Negotiations, originally scheduled to conclude by April 30, 2018, have been extended to August 15, 2018.

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Closed:

2. Milestone M-037-10/Closure Actions for Five Specified TSDs

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

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

Originated: 1/18/18

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to agree that TSD closures will be coordinated with the OUs, then determine best way to adjust the milestone. Milestone to be statused at the next RL TPA Quarterly Milestone Review Meeting on March 15, 2018.

Comments: Via RCRA Permit Rev. 9 discussions, agencies have agreed that closure of land-based TSDs can be coordinated with surrounding OUs. Should Milestone and TPA Section 5.5 be altered, potential exists for TPA negotiations, tentative agreement and/or public comment.

Closed:

Table III. Recently Closed/Other Agreements

1. Hanford Advisory Board Request to Attend TPA Quarterly Milestone Review and Project Manager Meetings

Reference: N/A

Affected Milestones: N/A

Originated: 1/18/18

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to decide whether to extend a standing invitation to the Hanford Advisory Board (HAB) to attend Tri-Party Agreement Quarterly Milestone Review and Project Manager Meetings. Regardless of decision to invite, action remains to communicate that decision to the HAB.

Comments: State of Oregon and Tribal Nations are extended invitations to TPA meetings per Memorandum of Understandings, none exists for the HAB, though HAB is entitled to briefings by the IAMIT, per the TPA. Agency public involvement staff have communicated the Parties' decision to the HAB Chair, who accepted the decision.

Closed: April 3, 2018

2. All Electronic Administrative Record

Reference: P-09-15-01

Affected Milestones: N/A

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Originated: Draft provided to regulators

Status: On-hold

Dispute Extended: N/A

Action: DOE and Ecology to reach agreement path forward.

Comments: Ecology is tying the shift to all-electronic Administrative Record to an upgrade of the AR usability and features. DOE has recently authorized MSA to implement an upgrade of the Administrative Record. The Parties agreed to remove this item from the action/status tracking table until an on-going upgrade is complete (estimated at about a year). The action will be revisited at that time.

Closed: March 15, 2018 (*Action placed on-hold)



Inter-Agency Management Integration Team Meeting
Thursday, July 19, 2018
Department of Ecology Building
3100 Port of Benton Blvd.
Richland, WA
Chair: EPA

Agenda

1.	Review IAMIT Action Tracking Table
2.	New Action Items <ul style="list-style-type: none">- Mass Loading Factor (MLF) vs. Applicability of Particulate Emission Factor (PEF) for calculating soil inhalation cleanup levels – IAMIT Determination- 200-BP-5 and 200-PO-1 Interim Action Record of Decision Strategy – IAMIT Determination
3.	Other <ul style="list-style-type: none">- M-091-47D Agreement In Principle extension
4.	Adjourn



TPA Interagency Management Integration Team Meeting
July 19, 2018

<u>Name</u>	<u>Organization</u>
Michael Cline	DOE/RL
Sara Austin	CHPRC
Dave Eisen	EPA
CAROLYN NOONAN	MSA
Ben Vannah	DOE-RL
Scott Davis	MSA-TPA
GLYN TRINKHARD	DOE ORP
Stephanie Brasher	MSA TPA
Jim Hansen	RL
Craig Cameron	EPA
Alex Smith	Ecology
Nina Menard	ECY
Cheryl Whalen	ECY
John Price	ECY
Joe Franco	DOE/RL

