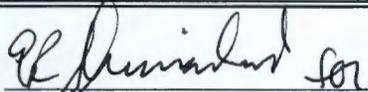
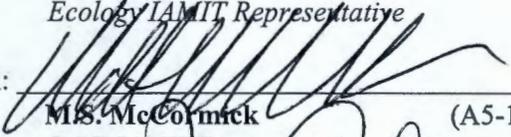


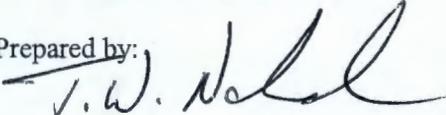
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**Inter-Agency Management Integration Team (IAMIT)
Meeting Minutes
April 17, 2008**

Approval:  Date: 5/27/08
J. Hedges (H0-57)
Ecology IAMIT Representative

Approval:  Date: 5/27/08
M.S. McCormick (A5-11)
DOE IAMIT Representative, Chairperson

Approval:  Date: 5/27/2008
N. Ceto (B1-46)
EPA IAMIT Representative

Minutes Prepared by:  Date: 5/27/2008
T.W. Noland (H8-12)
Fluor Federal Services, Inc.

Bilson, B.	FH	H8-20	McKarns, A.C.*	RL	A5-15
Black, D.G.	FH	H8-12	Niles, K.	OOE	
Bohnee, G	NPT		Noland, T.W.*	FFS	H8-12
Brockman, D.A.	RL	A7-50	Piippo, R.E.*	FH	H8-12
Cameron, C.E.*	EPA	B1-46	Post, T.C.*	RL	A3-04
Ceto, N.	EPA	B1-46	Price, J.B.*	Ecology	H0-57
Charboneau, B.L.	RL	A6-33	Rasmussen, J.E.*	YAH	A5-15
Charboneau, S.L.*	RL	A6-33	Russell, R.W.	ORP	H6-60
Cimon, S.	ODE		Skinnarland, E.R.*	Ecology	H0-57
Donnelly, J.W.	WCH	H4-22	Smith-Jackson, N.N.*	Ecology	H0-57
Engelmann, R.H.*	FH	H8-12	Vance, J.G.	FFS	H8-12
Einan, D.R.	EPA	B1-46	Weil, S.R.*	RL	A5-16
Faulk, D.A.*	EPA	B1-46	Whalen, C.L.*	Ecology	H0-57
Foley, B.L.	RL	A6-38	Williams, J.D.	FH	E6-35
Franco, J.R.*	RL	A3-04	Williamson, B.D.	RL	A4-52
Harris, S.	CTUIR		Administrative Record		H6-08
Hedges, J.A.*	Ecology	H0-57			
Henry, D.	OOE		* Attendees		
Horst, L.	OOE				
Huckaby, A.D.*	Ecology	H0-57			
Huffman, L.A.	ORP	H6-60			
Gadbois, L.E.*	EPA	B1-46			
Jim, R.	Yakama				
Knox, K.*	KCR				
McCormick, M.S.*	RL	A5-11			

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**Inter-Agency Management Integration Team (IAMIT)
Meeting Minutes
April 17, 2008**

116-N-1 Dispute

Ecology provided a review of the statement of dispute: In 2007, DOE requested a reclassification for the 116-N-1 Waste Management Unit through the TPA MP-14 reclassification procedures. Ecology rejected the DOE request. RL met with Ecology on December 27, 2008 to discuss Ecology's rejection of the reclassification request and subsequently informed Ecology that DOE was elevating the dispute at the IAMIT level. A January 17, 2008 Statement of Dispute was issued by DOE which sets forth the nature of the dispute.

DOE provided a handout with the DOE position and Ecology position in regards to the 116-N-1 reclassification. DOE also presented a handout with the issues in the separate categories: Need for Permit Modification Requirements, RESRAD Results and Concerns, Use of Leachability Study Data for Hexavalent Chromium, and Use of Groundwater Monitoring Data. DOE noted that their goal was to close the 116-N-1 WIDS site by documenting that the cleanup requirements, as defined in the work plan, have been met.

Ecology referred to its April 2006 letter requesting DOE to evaluate all the accumulated information to make its best case, and stated that DOE did not provide the information. Ecology noted that some of the information provided and discussed at today's meeting could satisfy what was requested in the April 2006 letter. DOE asked if additional information was provided (i.e. groundwater data and leachability studies), would Ecology consider signing the Cleanup Verification Package (CVP). Ecology responded that it would consider signing the CVP after evaluating the supplemental information provided by DOE.

It was agreed to end this dispute, and if the revised CVP is not accepted by Ecology, another dispute could be initiated. The question of whether or not an individual WIDS site can be closed when there are multiple WIDS sites within a TSD remains as a possible issue that the IAMIT would address if it is determined there are other instances where there are multiple WIDS sites in a TSD.

221-U Facility RD/RA Work Plan Dispute

Discussion on this topic was deferred to the next scheduled IAMIT meeting.

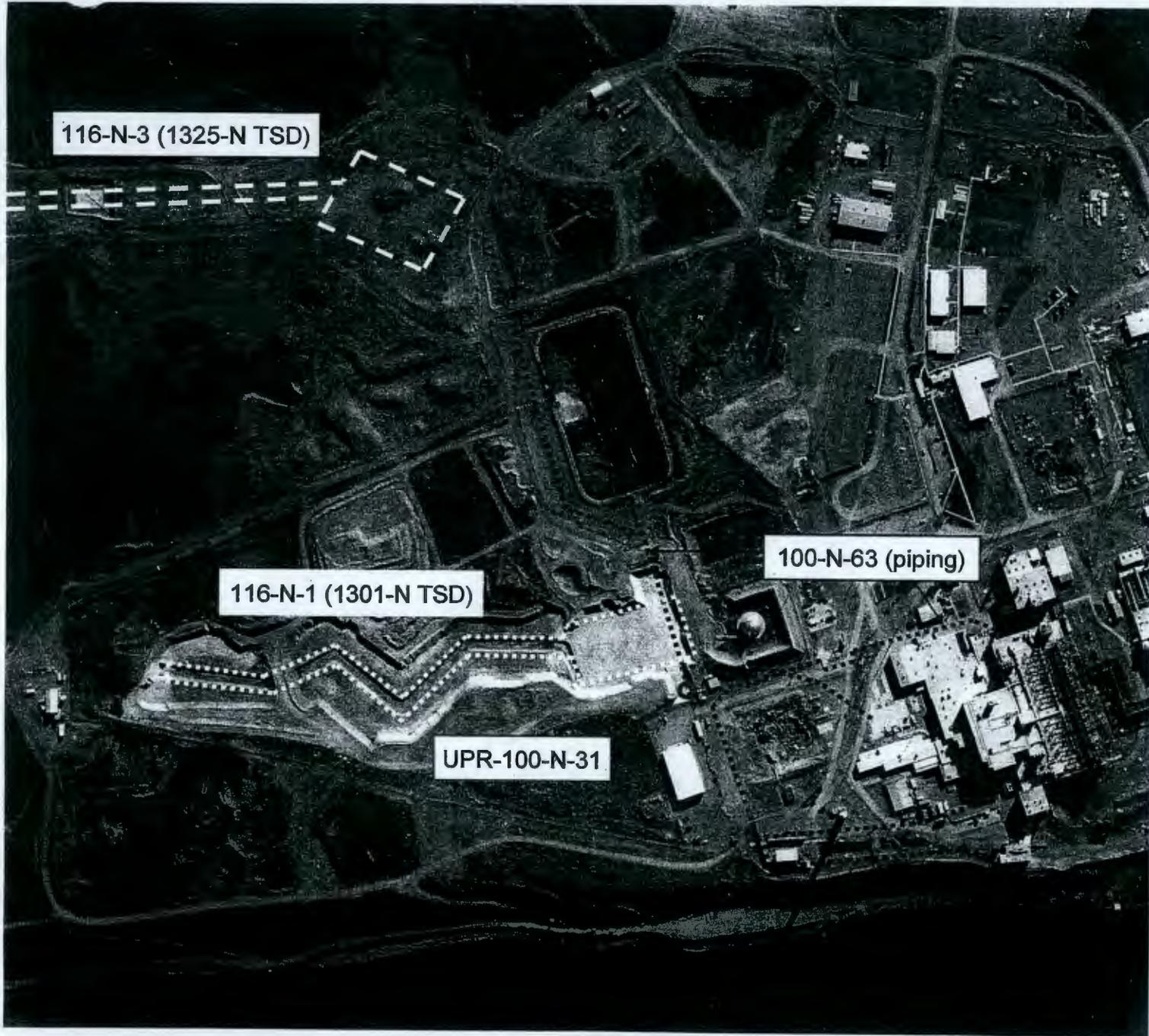


Thursday, April 17, 2008
Ecology Offices, Conference Room 3A
3100 Port of Benton Way
Richland, Washington

Agenda

Inter-Agency Management Integration Team Meeting
Chairman: Matt McCormick

10:45 a.m.	116-N-1 Dispute
11:00 a.m.	221-U Facility RD/RA Work Plan Dispute
11:15 a.m.	Adjourn Inter-Agency Management Integration Team Meeting



116-N-3 (1325-N TSD)

116-N-1 (1301-N TSD)

UPR-100-N-31

100-N-63 (piping)

*Strontium-90
and tritium
concentrations
exceed drinking
water standards at
the 116-N-1 liquid
waste disposal
facility.*

(DOE/RL-2005-96) describes phytoremediation as a technology to be evaluated during the March 2008 evaluation milestone as described in the Tri-Party Agreement change request (M-16-06-01 Change Control Form). If phytoremediation is favorably evaluated, it would be incorporated into the treatability test plan.

2.4.3 Facility Monitoring

This section describes results of monitoring individual facilities: the 116-N-1 and 116-N-3 facilities, 120-N-1 percolation pond, and 120-N-2 surface impoundment. Groundwater is monitored at these facilities to meet the requirements of RCRA for hazardous waste constituents and AEA for source, special nuclear, and by-product materials. Data from facility-specific monitoring are also integrated into the CERCLA groundwater investigations. Hazardous constituents and radionuclides are discussed jointly in this section to provide comprehensive interpretations for each facility. As discussed in Section 1.2, pursuant to RCRA units, DOE has sole and exclusive responsibility and authority to regulate source, special nuclear, and by-product materials. Groundwater data for these facilities are available in the Hanford Environmental Information System (HEIS 1994) and in the data files accompanying this report. Additional information including well and constituent lists, maps, flow rates, and statistical tables are included in Appendix B.

2.4.3.1 116-N-1 (1301-N) Liquid Waste Disposal Facility

This facility contaminated groundwater with radionuclides during its period of use in the 1960s through 1985. Strontium-90 and tritium concentrations in groundwater exceed drinking water standards. Results of monitoring were discussed in Section 2.4.1. The facility was excavated to remove shallow vadose zone sediment, where most of the radionuclide contamination resided, and was backfilled in FY 2006. Wells downgradient of the 116-N-1 facility are sampled quarterly to annually for strontium-90 and gamma activity. No gamma-emitters were detected in FY 2006. Strontium-90 concentrations increased in several downgradient wells when the water table rose in June 2006 (see Section 2.4.1.1).

This facility is included in the Hanford Facility RCRA Permit (Ecology 1994a). The closure plan (see Appendix A of DOE/RL-96-39) states that RCRA monitoring during closure activities will follow the requirements of BHI-00725. That plan and a supplemental plan (PNNL-13914) are similar to an interim status indicator evaluation program (40 CFR 265.93(b), as referenced by WAC 173-303-400).

Groundwater flows to the northwest beneath the 116-N-1 facility, discharging to the Columbia River. The hydraulic gradient in March 2006 was 0.0019, and flow rate was estimated to be between 0.04 to 0.69 meter/day (Appendix B).

Upgradient and downgradient wells are scheduled for sampling twice each year for contamination indicator parameters (pH, specific conductance, total organic carbon, and total organic halides) and once for groundwater quality and site-specific parameters. The second sampling of two wells was delayed past the end of the fiscal year (see Section 1.2 and Appendix B). Other wells were sampled as scheduled.

Average specific conductance in downgradient well 199-N-3 dropped below the critical mean value in March 2006 but exceeded the value in October 2006 (delayed from September). This was a continuation of previous exceedances, and prior assessment results (WHC-SD-EN-EV-003) indicated the elevated specific conductance is related to constituents from the 120-N-1 percolation pond. Total organic carbon in well 199-N-3 exceeded the upgradient/downgradient comparison value in October 2006. The well is located near an area of contamination from an old diesel leak, and has had elevated total organic carbon in the past. Verification sampling was conducted in January 2007. Results were not available for inclusion in this report.

Upgradient/downgradient comparison values for indicator parameters have been revised based on recent data for use in FY 2007 comparisons (see Appendix B).

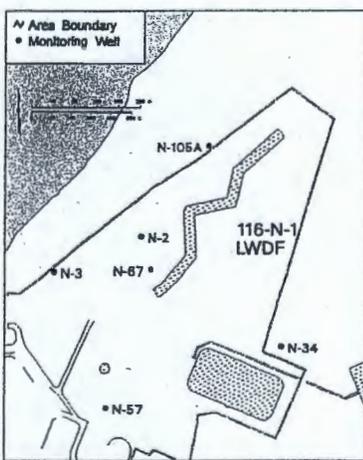
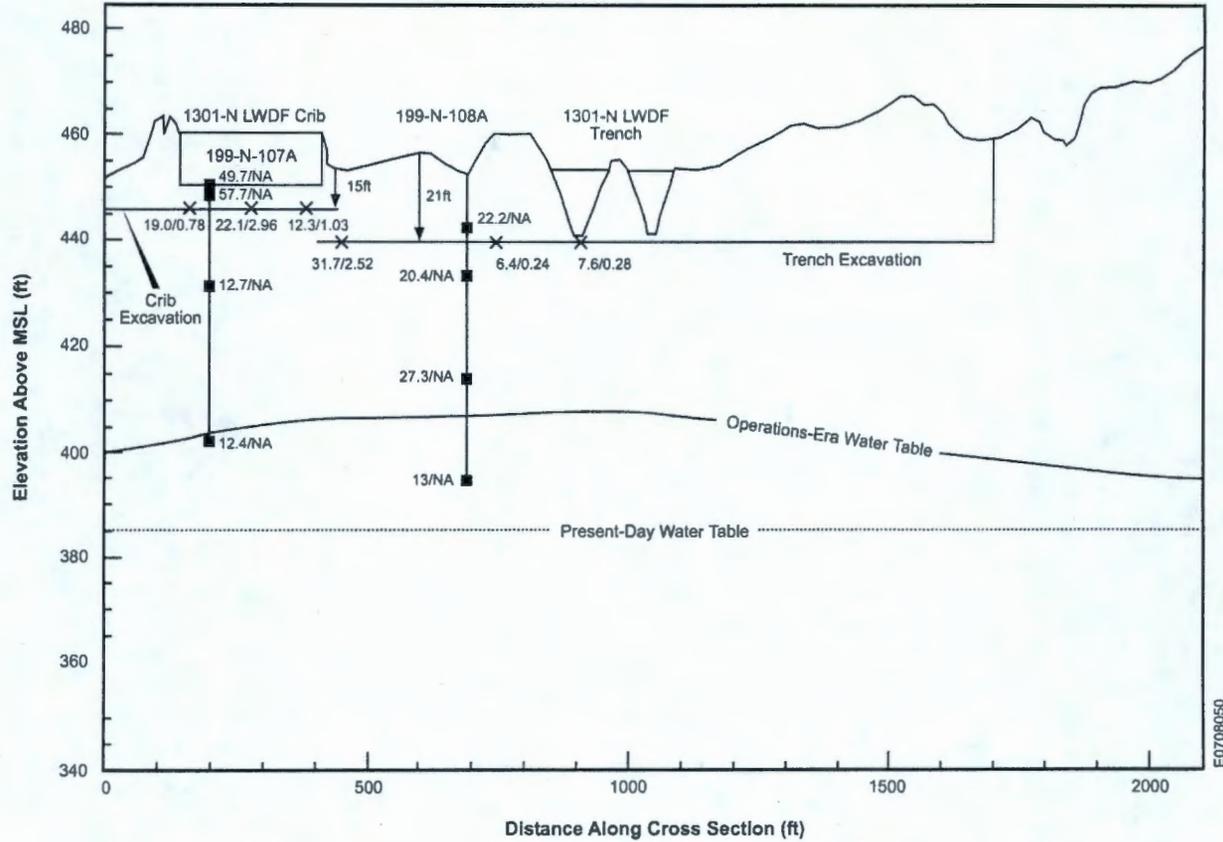


Figure 2. 1301-N Cross Section of Structure and Excavation



Sample concentration in mg/kg
 X = Cleanup Verification Sample - Total Cr/CrVI
 ■ = Limited Field Investigation Sample - Total Cr/CrVI
 NA = Not Analyzed

Need for RCRA Permit Modification

DOE Position

- DOE believes a RCRA permit modification was not required when balancing factors were invoked by the ESD.
- The RDR/RAWP [Ref. 1] and the RCRA closure plan requires an amendment whenever a change occurs in the closure activities that would constitute a Class 1, 2, or 3 modification to the RCRA permit.
- Since the ESD addresses only radionuclides – which are outside the scope of RCRA jurisdiction – amendment of the RCRA closure plan is not required.
- The ESD’s modification of RESRAD input parameters (no irrigation) was not necessary for RCRA regulated constituents to meet RAOs.

Ecology Position

Need for a permit modification is clearly spelled out in the approved RDR/RAWP and in a US DOE letter:

- Pg. 3-12 of the RDR/RAWP has a specific requirement to amend the closure plan when balancing factors are invoked. The ESD [Ref. 2] invoked balancing factors, so DOE is delinquent in not submitting a closure plan amendment.
- DOE letter 02-ERD-0141 specifically commits to updates to the RCRA permit as a result of implementing balancing factors:
- “A RDR/RAWP revision would be required to reflect a change in the RESRAD input parameters (no irrigation) and discuss the implementation of Balancing Factors. During or after the necessary CERCLA documentation modifications were made the RCRA Permit would be evaluated for any potential modifications. These modifications would be initiated as necessary after the ESD is approved.”

DOE never completed the evaluation that it committed to do. Because the closure plan hasn’t been amended: closure isn’t complete, DOE hasn’t demonstrated compliance with RCRA closure performance standards, RAOs haven’t been met, and Ecology shouldn’t sign the WSRF.

RESRAD results/concerns

DOE Position

RESRAD modeling indicates that groundwater will not be impacted by hazardous constituents. DOE followed the RESRAD methodology prescribed in the approved RDR/RA work plan.

RESRAD modeling is used to determine if the residual concentrations of contaminants in the bottom of the remediated waste site will be protective of groundwater and the river. RESRAD modeling determined that residual concentrations of contaminants in the bottom of the remediated waste site will not reach the portion of the vadose zone that was affected by past mounding of groundwater for greater than 1,000 years.

Ecology Position

RESRAD modeling is allowed by the 100-NR-1 RDR/RAWP. However, the RESRAD modeling was done in a manner not proposed to Ecology, and not approved by Ecology. It doesn’t demonstrate that RAOs were met.

- Leaching tests for other reactor areas were used w/o prior notice to Ecology, and w/o Ecology approval.
- WAC 173-340-747(8) is an ARAR, and requires site-specific leaching tests. The 100-H and 100-F tests don’t fit the definition of “site-specific” leaching tests, and DOE didn’t comply with the ARAR, a CERCLA threshold criteria.
- A site-specific leaching test was done for 100-N, but the results weren’t submitted to Ecology.

Use of leachability study data for hexavalent chromium

DOE Position

Leach test samples were obtained from the location of one of the soil samples where the hexavalent chromium analysis exceeded the soil RAG for protection of the river. The hexavalent chromium concentration in these samples were below the soil RAG for river protection. These results have not been formally submitted to Ecology.

Based on the results of the leach rate study conducted on samples from waste site 116-D-7 Ecology and DOE/RL agreed that soils with a hexavalent chromium concentration of less than 6.1 mg/kg did not pose a threat to the Columbia River. Agreements documented in *UMM Meeting Minutes – 100 Area Remedial Action and Waste Disposal Unit/Source Operable Units*, November 2000, CCN 086352. Similar hexavalent chromium leach test results were obtained with soil samples from H-Area and F-Area. The geologic strata and soil at N-Area are very similar to the strata and soil at D-Area and H-Area so it is believed that residual concentrations of hexavalent chromium at 116-N-1 (a maximum of 2.96 mg/kg) do not pose a threat to the Columbia River. Hexavalent chromium has not been identified as a contaminate in the groundwater in the N-Area.

Ecology Position

DOE should have submitted the 100-N leach test results to Ecology. DOE should update the 116-N-1 CVP to include those results, and should resubmit the CVP to Ecology.

The leach tests for the 116-D-7 site were approved under the 100 Area RDR/RAWP (DOE-RL 2005), and not the **100-N** RDR/RAWP (DOE-RL 2001), Ecology has not, and does not approve the applicability of this test for the 100-N soils. DOE chose to use 100-D data without prior consultation with Ecology.

Site-specific leaching tests are specifically required by WAC 173-340-747(8), which is both a CERCLA ARAR and a closure performance standard. Because site-specific leaching tests were not submitted to Ecology, DOE has not complied with ARARs and has not demonstrated compliance with the closure performance standard.

DOE never discussed (and still has not discussed) with Ecology how they determined that the “geologic strata and soil at N-Area are very similar to the strata and soil at D-Area and H-Area.”

Use of Groundwater Monitoring Data

DOE Position

20 years of groundwater monitoring demonstrate that chromium and hexavalent chromium are below cleanup levels. Groundwater will continue to be monitored. An integrated RCRA/CERCLA monitoring plan is being developed for the 100-N Area.

Ecology Position

The 20 years of groundwater monitoring aren't conclusive with respect to releases from the 116-N-1. It's difficult to monitor the groundwater downgradient from a long trench. Ecology has previously noted (several times) the significant deficiencies in the groundwater monitoring network, so the groundwater monitoring results are not definitive. Despite the ineffective groundwater monitoring, hazardous constituents have been detected and indicate a release to groundwater.

Groundwater monitoring data wasn't addressed in the CVP; DOE can revise the CVP (to inc. groundwater results) if it supports DOE position.

116-N-1/1301-N LIQUID WASTE DISPOSAL FACILITY DISPUTE SUMMARY

116-N-1 waste site reclassification

DOE Position

DOE believes it has completed the interim remedial action and has met RAOs for the 116-N-1 waste site. WIDS reclassification and TSD closure are separate actions. The waste site should be reclassified as "interim closed out" in accordance with TPA MP-14. Parties agree the "Ancillary Pipelines" (100-N-63) still need to be addressed. RCRA closure has not been completed, therefore, a "RCRA post-closure" determination would neither be appropriate nor required at this point under TPA MP-14.

Use of the Cleanup Verification Package (CVP) to support TPA-M-14 Reclassification decisions is a well established process. Its use was documented in the RDR/RA work plan. WSRF's represent documentation on key data and decisions on the remediation status of a waste site, and are appropriately viewed as primary documents subject to dispute resolution under the TPA. (Pg 3-17 of the 100-NR-1 TSD RDR/RAWP [Ref. 1] further describes that regulator approval of site reclassification will be documented on a MP-14 site reclassification form.)

Soil and deep vadose zone data, RESRAD, a site specific leaching study, and over 20 years of RCRA groundwater monitoring confirm that RAOs have been met at 116-N-1.

Ecology should sign the Waste Site Reclassification Form (WSRF) in accordance with TPA MP-14, as invoked by Section 3.7 of the approved RDR/RAWP for the 100-NR-1 TSD.

Ecology Position

The waste site should not be reclassified as "interim closed out" because RAOs have not been met. Ecology rejected Waste Site Reclassification Form submitted by DOE, based on MP-14 criteria and supporting documents:

- TPA MP-14 states waste sites should be reclassified as interim close out when RAOs are met.
- Ecology letter dated April 11, 2006 stated that RAOs were not met, because closeout sample results exceeded RAOs.
- Besides closeout samples, 1995 characterization data may indicate that RAOs are exceeded (1995 samples were analyzed for total chrome but not hex chrome; if the sample results were hex chrome, they would exceed cleanup levels and RAOs would not be met).

Cleanup verification package submitted by DOE supports Ecology position that RAOs were not met: Specifically, the CVP identified that "completion of closure for the *Resource Conservation and Recovery Act of 1976* (RCRA) treatment, storage, and disposal (TSD) unit is pending"

- CERCLA ROD states (page ii) "DOE shall comply with all permit conditions stated in the Hanford Facility RCRA Permit for any site covered by this ROD, and issuance of this ROD does not effect [sic] DOE's obligations to comply with those permit conditions."

DOE has not demonstrated compliance with RCRA closure performance standards, therefore the cleanup of the 116-N-1 waste site is not complete.

Table 2. Reclassification Categories.

Reclassification Categories	Description
Rejected	A reclassification status indicating a site does not require remediation under RCRA Corrective Action, CERCLA, or other cleanup standards based on qualitative information such as a review of historical records, photographs, drawings, walkdowns, ground penetrating radar scans, and shallow test pits. Such investigations do not include quantitative measurements.
No Action	A reclassification status indicating a site does not require any further remedial action under RCRA Corrective Action, CERCLA, or other cleanup standards based on an assessment of quantitative data collected for the site.
* Closed Out	A reclassification status indicating, due to actions taken, a waste management unit meets applicable cleanup standards or closure requirements.
* Interim Closed Out	A reclassification status indicating, due to actions taken, a waste management unit meets cleanup standards specified in an Interim Action Record of Decision or Action Memorandum, but for which a Final Record of Decision has not been issued.
RCRA Postclosure	A reclassification status indicating that the TSD unit has been closed with waste in place and postclosure care, including monitoring and institutional controls, is being implemented.
Consolidated	A reclassification status indicating a site is a duplicate of, physically located within, or adjacent to another WIDS site and will be dispositioned as part of that other site. NOTE: A consolidated site has no future updates in WIDS after reclassification. All updates are limited to the site with which it was consolidated.
Deleted from NPL	A reclassification status indicating waste management unit is deleted from NPL or included in a final action published in the Federal Register to delete a listing from the NPL.

Table 3. Reclassification to Closed Out, Interim Closed Out, or RCRA Postclosure

Unit Category	Reclassification Status	Signatures Required	Documentation Required
RCRA Past Practice (RPP) or CERCLA Past Practice (CPP)	Closed Out or Interim Closed Out	DOE and Lead Regulatory Agency	Signed Waste Site Reclassification Form with appropriate closeout documentation.
RCRA Past Practice (RPP) or CERCLA Past Practice (CPP)	No Action	DOE and Lead Regulatory Agency	Signed Waste Site Reclassification Form with attached documentation supporting a No Action decision.
* RCRA/CERCLA Integration (TSD)	Closed Out or Interim Closed Out	DOE, Lead Regulatory Agency and Ecology (if not Lead Regulatory Agency for the Operable Unit)	Waste Site Reclassification Form with Certification of TSD Closure Acceptance Letter signed by Ecology attached (signed letter from Ecology eliminates need for signatures on the form). The form should indicate if waste site controls are required after closure.
RCRA TSD • Clean Closure • Procedural Closure	Closed Out	DOE and Ecology	Waste Site Reclassification Form with Certification of TSD Closure Acceptance Letter or written concurrence for procedural closure signed by Ecology attached (signed letter from Ecology eliminates need for signatures on the form).
RCRA TSD • Landfill Closure	RCRA Postclosure	DOE and Ecology	Waste Site Reclassification form with attached documentation showing RCRA postclosure has begun.
Petroleum UST	Closed Out	DOE and Ecology	Waste Site Reclassification Form with attached Ecology letter documenting the WAC 173-360 requirements have been met (signed letter from Ecology eliminates need for signatures on the form)
Septic System	Closed Out	DOE	Signed Waste Site Reclassification Form documenting the WAC 246-272-18501 requirements have been met.
Injection Well/ State Waste Discharge Permitted Site	Closed Out	DOE	Signed Waste Site Reclassification Form documenting the WAC 173-216/218 requirements have been met