

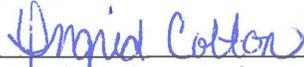
M-026-01 Project Manager Meeting Minutes

November 7, 2019, 9:00-10:00 am

825 Jadwin Avenue, Room 340

The undersigned Tri-Party Agreement Project Managers indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated meeting. Signatures denote concurrence with content only and do not imply agreement or commitments.

Approval:



Ingrid Colton, Project Manager
U.S. Department of Energy,
Richland Operations Office

Date: 2-10-2020

Approval:



Kelly Elsethagen, Project Manager
Washington State Department of Ecology

Date: 3/9/20

Attendees: Attachment 1

Agenda: Attachment 2

Action List: Attachment 3

Minutes:

1. Status/approval of previous meeting minutes

MSA explained that the August 28, 2019, M-026-01 project manager meeting minutes were approved and ready for signature. DOE-RL and Ecology signed the minutes package, and MSA took the action to route the minutes to DOE-ORP for signature and submittal to the Administrative Record.

2. Milestone status

- **M-026-01Y.**¹ DOE-RL transmitted 20-AMRP-0004 to Ecology on November 6, which included supplemental comment response corrections as well as a signed primary document cover sheet. The supplemental responses pertained to items 175, 176, and 190 of the review comment record. Ecology explained that they would review the proposed wording of the comments, but that there appeared to be an inconsistency with the proposed response to comment 190.
- **M-026-01AD.** MSA stated that the CY 2019 report is on schedule. Ecology asked if DOE had identified any issues with the draft response letter to 19-PFD-0034 that Ecology had shared during an informal meeting in September, or if DOE could address all of the bulleted items therein in the CY 2019 report. The agencies discussed the expectations for including characterization and treatment milestones in the CY 2019 report where they are missing (bullets three and four of the draft letter). They acknowledged the lengthy process of establishing milestones/schedules, and agreed that any such negotiations would be performed by the appropriate project and section managers in accordance with section 12 of the TPA action plan. Ecology stated the intent was to document the agencies' agreement that characterization and treatment milestones/schedules are needed for all mixed waste streams at Hanford, and that they would consider clarifying the language.

The parties also discussed the use of a date in lieu of TPA milestone, CERCLA work document, or RCRA closure plan schedule. DOE stated that the "LDR Report Expectations" documented in the 2002 resolution of dispute, clearly state that a date

¹ Note: The agenda mistakenly stated "CY 2014 Summary Report." The agenda attached has been corrected in redline to reflect the correct short title, "CY 2014 Full Report."

would meet the requirement for a schedule. Ecology acknowledged the resolution of dispute language, but questioned the enforceability of dates not associated with real commitments. DOE stated that this report is a snapshot in time, and the TPA is the enforcement mechanism, not the report. Ecology expressed the intent to follow up with their attorneys as the appropriate authority on enforceability.

Additional discussion addressed the fifth bullet in Ecology's draft letter. CHPRC explained that the third sentence of that bullet could be clarified, because incomplete characterization is not necessarily why a treatment technology is not selected (i.e., some wastes without a selected treatment technology have been sufficiently characterized). CHPRC continued that, in some cases, there are other reasons that a planned treatment option has not been yet selected (e.g., waste streams planned to be addressed by the Canyon Disposition Initiative, the M-085 milestone series). Ecology stated that if the waste is sufficiently characterized, and there exists an EPA-approved technology to treat that waste type, that technology needed to be identified in the LDR report. CHPRC explained that some of the terminology used in prior years' reports could be compounding the perceived issues. The agencies agreed that the rewrite of chapter 9.0 should address these items.

Ecology requested DOE's comments on the draft letter, and stated that they would share a revised draft of the response letter along with a draft response to 20-AMRP-0004 at the same time.

3. Status of previous agreements and commitments

- **Parking lot discussions.** MSA asked if the agencies preferred to address parking lot items inside or outside of PMMs. The agencies agreed to address the parking lot items in separate meetings outside of PMMs. MSA inquired when Ecology would like to participate in an LDR database demonstration, and Ecology indicated they would like to defer the demonstration until after parking lot discussions. MSA will add the LDR demonstration to the agreements and commitments list.
- **Ecology response to 19-PFD-0034.** This item was discussed under item 2, "Milestone Status."
- **MSA's strawman schedule.** MSA distributed the Calendar Year 2019 Hanford Site Mixed Waste Land Disposal Restrictions Full Report Schedule in table format (Attachment 4), and explained the dates were extracted from an internal desk instruction. MSA also explained that most of the contractor personnel responsible for preparing the CY 2019 report are new to the process, and several meetings not listed on the schedule are likely to be required. MSA will status the agencies if any significant changes to the schedule occur. This item will be closed.

- **DOE formal letter describing any 2019 commitments that may be impacted by LDR database changes.** MSA asked if Ecology expected a formal letter describing impacts to the LDR report from any proposed database changes. Ecology indicated a formal letter was not needed. This item will be closed.
- **Option to change report title to site treatment plan.** DOE explained that the LDR report terminology is used pervasively at the site, so changing the name would add confusion. DOE proposed and Ecology agreed to close this item.

4. Any new agreements and commitments

- DOE – Provide Ecology any comments on their draft response to 19-PFD-0034.
- Ecology – Provide DOE revised draft response to 19-PFD-0034 and 20-AMRP-0004.
- MSA – Provide LDR database demo following parking lot discussions.

5. Any approved changes

The agencies discussed a commitment from the CY 2014 report comment resolution activities to change section 2.2 of the location-specific data sheets in the CY 2019 report. The commitment included changing "Building/Room Number" to "Physical Location," and "Number of Containers/Tanks" to "Method of Storage." MSA explained that there was insufficient time to change the actual LDR database in time for the CY 2019 Report production due to the arduous software quality assurance documentation requirements associated with any change. The parties agreed that it would be acceptable to perform a manual change to the report post-production for the CY 2019 submittal, and that the item would be added to a list of database changes for the next report. MSA explained that BNI did not anticipate needing any new treatability groups for the 2020 report, but that if new treatability groups are required, they would need to be approved by the TPA project managers by November 30 per the milestone language.

6. Action item status

The agencies agreed that the meeting format no longer required a separate action-tracking list (Attachment 3). The list, and the associated portion of the agenda and minutes package, will be discontinued.

7. Documents to be submitted to the Administrative Record

MSA will submit the signed August project manager meeting minutes after obtaining DOE-ORP's signature.

8. Next meeting

MSA explained that the calendar series would be updated to ensure the participation of DOE-ORP. MSA asked whether the agencies would prefer monthly or bimonthly meetings. Ecology and DOE-RL agreed that monthly meetings would be preferred for the time being.