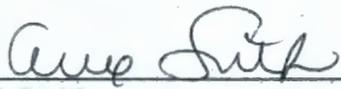
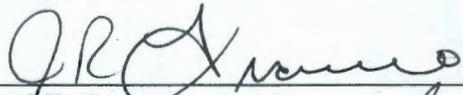




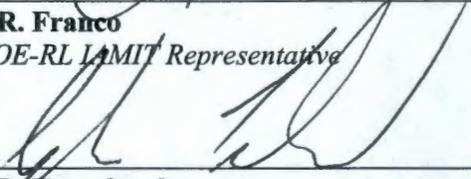
**Inter-Agency Management Integration Team (IAMIT)  
Meeting Minutes  
March 15, 2018**

Approval:   
**A.K. Smith**  
*Ecology IAMIT Representative*

Date: 3/5/18

Approval:   
**J.R. Franco**  
*DOE-RL IAMIT Representative*

Date: 8<sup>am</sup> 4/2/18

Approval:   
**G.D. Trenchard**  
*DOE-ORP IAMIT Representative*

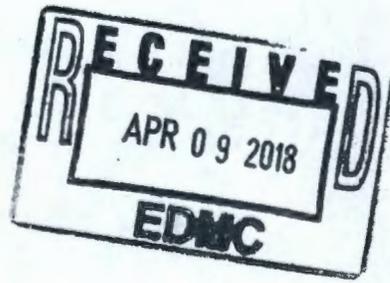
Date: 4-2-18

Approval:   
**D.R. Einan**  
*EPA IAMIT Representative*

Date: 9 Apr 18

Minutes Prepared by:   
**M.J. Turner**  
*Mission Support Alliance*

Date: 3/28/18



**Inter-Agency Management Integration Team (IAMIT)  
Meeting Minutes  
March 15, 2018**

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

**Table I. Actions Items**

- A) PUREX Closure Plan, Part A – There were no updates provided today. This action remains open.
- B) Hanford Advisory Board (HAB) Request to Attend TPA Quarterly Milestone Review and Project Manager Meetings – The IAMIT reached a consensus that it is opposed to the HAB's request to attend the TPA meetings. MSA stated that the public involvement (PI) teams have been briefed on the request, and the point was made that since the HAB's request was made verbally, the response could also be made verbally. DOE-RL recommended that the communications team is briefed before the PI team responds to the HAB in an effort to be prepared in the event there are inquiries from the HAB. This action was closed.

**Table II. Status Updates**

- A) All-Electronic Administrative Record (AR) – MSA pointed out that there is a new update to this action, highlighted in blue, stating that DOE has recently authorized MSA to implement an upgrade to the AR. MSA noted that this action has been carried for some time, and that DOE-RL had suggested closing this action. DOE-RL concurred that the suggestion had been made, and noted that the upgrades to the AR will take about a year. DOE-RL suggested revisiting this action once the upgrades are completed. Ecology suggested deleting the action. Ecology stated that when the upgrades are completed in a year, it would be ready to sign a TPA change form for an all-electronic AR. This action was closed.
- B) TPA Five-Year Review – MSA stated that there were no new updates to this action, but there are some upcoming major changes to Appendices H and I, and that Section 5.5 is also being addressed. MSA noted that Ecology had informed the HAB that a reprint is planned in 2019. Ecology stated that discussions continue on Appendices H and I, and ORP's attorney will be sending information to Ecology's attorney this week. This action remains open.
- C) Milestone M-037-10/Closure Actions for Five Specified TSDs – MSA stated that this action is associated with Section 5.5 and addressing TSD units inside of an operable unit. Ecology noted that this issue was discussed at the previous IAMIT meeting, and that Ecology's attorney was going to send a Section 5.5 markup to DOE-RL's attorney, which has not yet happened. Ecology stated that the EPA and Ecology legal staff have been discussing the issue.

Ecology stated that CHPRC, through DOE-RL, had requested milestone relief because they were at the point of needing to work on the closure of the TSDs or being at risk of missing the milestone. Ecology indicated that discussions are ongoing with CHPRC and DOE-RL, and a meeting was held yesterday. Ecology stated that draft TPA changes and proposed TPA milestone changes have been shared with CHPRC and DOE-RL. Ecology stated that it will be sharing the

proposed TPA milestone changes within the next month, with the understanding that DOE-RL/CHPRC are at risk of missing the milestone. This action remains open.

**Table III. Recently Closed/Other Agreements**

A) None.

**2) Topic: New Action Items**

\*Note DOE-RL and Ecology staff, along with DOE-RL and Ecology IAMIT members contributed to this discussion. That distinction is noted for clarity when necessary.

A) Briefing/Overview: Mass Loading Factor (MLF) vs. Applicability of Particulate Emission Factor (PEF) for Calculating Soil Inhalation Cleanup Levels – DOE-RL (staff) distributed a one-page handout outlining the dispute being presented today. DOE-RL stated that the purpose of today's briefing was to determine whether the IAMIT was willing to assist with resolving the MLF vs. PEF dispute between DOE-RL and Ecology project managers. DOE-RL stated that the purpose of seeking an IAMIT decision was to provide a unified path forward for multiple projects and prevent the debate from coming up again. DOE-RL noted that a resolution from the IAMIT was not being sought today. DOE-RL provided a background on the dispute regarding the debate over the past three years between DOE-RL and Ecology project managers across multiple units about the use of the PEF method and value to calculate soil cleanup levels.

DOE-RL stated that contaminated soils can become airborne by wind and then inhaled by a bioreceptor, or a person. The PEF method helps to evaluate the inhalation pathway and to calculate soil cleanup levels; i.e., how clean does the soil need to be so the receptors are not being harmed to a certain degree.

DOE-RL stated that the debate first came up in 2015 for the RCRA Rev. 9 permit in terms of presenting closure performance standards in the closure plans. More recently, in 2017, the 200-EA-1 work plan received a comment regarding the PEF method. DOE-RL pointed out that there was no use in coming to agreement on 200-EA-1 if there is not an overall agreement or an agreement from a higher level of management that would support the permitting team efforts.

DOE-RL provided a few potential paths forward for the IAMIT to consider for resolution, and asked if the IAMIT was willing to consider taking on the issue for resolution since it impacts Rev. 9 and the upcoming milestone in July 2018. DOE-RL (IAMIT member) noted that the PEF method is represented on the handout, and asked about the MLF method. Ecology (staff) stated that one of its technical staff arguments is why the PEF method is being used instead of MLF. DOE-RL (staff) responded to DOE-RL (IAMIT member)'s question by stating the intent was not to argue DOE-RL's and Ecology's positions, but that both PEF and MLF are methods used to help determine soil cleanup levels with the inhalation pathway. DOE-RL added that PEF was chosen as a set method for presenting the debate topic today.

EPA (IAMIT member) asked if PEF and MLF both represent the inhalation pathway. Ecology stated that either one could be used. Ecology (staff) added

that its understanding on the background was that the EPA guidance from 1996 was to use the PEF, although previous guidance from 1993 said to use the MLF. Ecology added that on the interim agreements for the River Corridor, DOE-RL used the MLF, and eventually it was changed to using the PEF. EPA stated that its understanding is that the PEF has one site-specific aspect that can be changed, and the rest are defaults. Ecology stated that the formula for calculating the PEF is fairly constant, except for the percent of vegetation cover, which is currently set at 50 percent, and the wind speed. Ecology added that the calculation used for wind speed is the local wind speed, but the remaining aspects are either standards or the percent of vegetation cover.

Ecology (IAMIT member) expressed a concern that the resolution could be broad-based that would apply to an array of situations if more site-specific conditions would make a difference about which method should be used. DOE-RL (staff) suggested that a presentation could be given at the next IAMIT to facilitate a resolution. EPA (staff) noted that the purpose of the IAMIT is not only to solve disputes, but to document decisions. Ecology (staff) stated that the purpose today is to ask the IAMIT if it would be willing to step into a decision-making role, if technical staff cannot come to an agreement, and then step into a documentation role. Ecology (staff) added that a presentation to the IAMIT could answer the question about whether a resolution could be applied informally through the Rev. 9 closure plans and issues as well as the CERCLA RI/FS. Ecology (IAMIT member) stated that it would be helpful to get more clarification about whether the decision would apply to all future RI/FSs and for all CERCLA processes. Ecology (staff) noted that there have been many discussions regarding principles and parameters, and the PEF vs. MLF represents one of the parameters.

An agreement was made that a presentation would be given at the April 19, 2018 IAMIT. DOE-RL (staff) noted that the technical staff have been working hard to resolve the issue, and asked the IAMIT if it would be willing to sign an IAMIT determination to document an agreement in the event an agreement is reached before April 19. DOE-RL (IAMIT member) responded that the IAMIT would take the agreement under consideration, but it would have to ensure there is a better understanding of the subject before committing to documenting an agreement.

### **3) Topic: Other**

- A) IAMIT Determinations Covering Individual Project Manager Meetings (PMMs) – MSA stated that there are two IAMIT determinations ready for signature today, and all of the IAMIT members have been briefed on the content of the determinations. The two IAMIT determinations are associated with milestones M-026 (Land Disposal Restrictions) and M-036 (Lifecycle Cost and Schedule Report), and they document what is to be discussed at the project manager meetings for these two milestones.

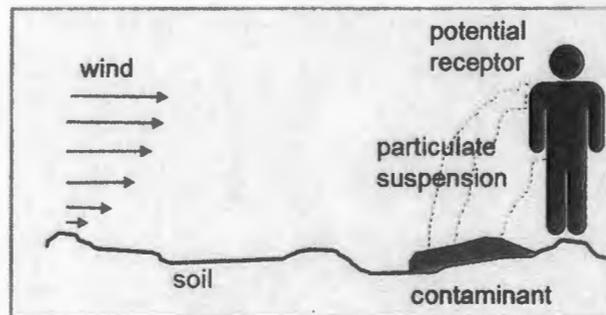
**EVENT:** IAMIT Agenda Item #2: Particulate Emission Factor (PEF) for Calculating Soil Cleanup Levels for the Inhalation Pathway

**DATE:** March 15, 2018

**PURPOSE:** Determine if the IAMIT is interested in resolving the PEF dispute between RL and Ecology project managers.

**BACKGROUND:** Since 2015, RL and Ecology project managers across multiple projects have debated RL's use of the Particulate Emission Factor (PEF) method and value to calculate soil cleanup levels.

Contaminated soils can become airborne (mostly by wind) and inhaled by a receptor. The PEF method helps us evaluate this inhalation pathway and calculate soil cleanup levels.



Ongoing 3 year debate that impacts multiple projects:

- RCRA Permit Rev 9 (closure performance standards for closure plans)
- 200-EA-1 RI/FS RFI/CMS work plan

An IAMIT decision provides a unified path forward for all projects involved, and prevents future, time consuming debate on this topic.

Suggestions for path forward if the IAMIT agrees to resolve at their level:

1. Debate at April 19<sup>th</sup> IAMIT,
2. Debate at a Special IAMIT,
3. Date at an upcoming Coordination meeting (April 12<sup>th</sup>/26<sup>th</sup>), or
4. Resolve offline with your respective staff members.

Logistics:

- RL and ECY issue position papers (or presentations) by March 30<sup>th</sup>.
- Once the matter is resolved, document the agreement with an IAMIT Determination.



*TPA Interagency Management Integration Team Meeting  
March 15, 2018*

<u>Name</u>	<u>Organization</u>
<u>GILYN TRENCHARD</u>	<u>DOE-ORP</u>
<u>Craig Cameron</u>	<u>EPA</u>
<u>Ron Stinnarant</u>	<u>Ecology</u>
<u>Benjamin Vannoh</u>	<u>DOE-RL</u>
<u>Sara Auger</u>	<u>CHRC</u>
<u>Carolyn Norman</u>	<u>MSA</u>
<u>Stephanie Brasler</u>	<u>MSA</u>
<u>Rana Evans</u>	<u>ORP</u>
<u>Sarah Dawson</u>	<u>DOE</u>
<u>Joel Raines</u>	<u>DOZ</u>
<u>Kathy King</u>	<u>court reporter</u>
<u>Alex Smith</u>	<u>Ecology</u>
<u>Joe &amp; France</u>	<u>DOE RL</u>
<u>John D Dougherty</u>	<u>WRPS</u>
<u>John Price</u>	<u>Ecology</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>



## **Inter-Agency Management Integration Team Meeting**

**Thursday, March 15, 2018**

Department of Ecology  
3100 Port of Benton Blvd.  
Richland, WA

**Chair: Joe Franco**

### **Agenda**

1.	Review IAMIT Action Tracking Table
2.	New Action Items <ul style="list-style-type: none"><li>- Briefing/Overview: Mass Loading Factor (MLF) vs. Applicability of Particulate Emission Factor (PEF) for calculating soil inhalation cleanup levels</li></ul>
3.	Other <ul style="list-style-type: none"><li>- IAMIT Determinations covering individual Project Manager Meetings status</li></ul>
4.	Adjourn

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

March 15, 2018

\*New items shown in blue

## Table I. Action Items

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### 1. PUREX Closure Plan, Pt. A

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**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.
  - 2) Ecology will respond to DOE-RL's letter accepting the agreement. Completed 7/25/17, reference Ecology letter 17-NWP-090.
  - 3) Ecology will develop a template for the closure plan.
  - 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:**

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

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**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 been briefed, and will assist with communication of IAMIT decision to the HAB.

**Closed:**

**Inter-Agency Management Integration Team Decision Table/Action Tracking**  
**March 15, 2018**

**Table II. Status Updates**

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**1. All Electronic Administrative Record**

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**Reference:** P-09-15-01  
**Affected Milestones:** N/A  
**Originated:** Draft provided to regulators  
**Status:** Open  
**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.  
**Closed:**

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**2. TPA Five-Year Review – Status**

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**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.

**Closed:**

Inter-Agency Management Integration Team Decision Table/Action Tracking  
March 15, 2018

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

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**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 stasured 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

- None