

Inter-Agency Management Integration Team Meeting Minutes
June 18, 2020



SIGNATURES:

Approval:  Date: 8/25/2020
W.F. Hamel, DOE-RL IAMIT Representative

Approval: Robert G. Hastings Digitally signed by Robert G. Hastings
Date: 2020.08.12 10:28:57 -07'00' Date: _____
R.G. Hastings, DOE-ORP IAMIT Representative

Approval:  Digitally signed by Smith, Alex (ECY)
Date: 2020.08.13 16:09:14 -07'00' Date: _____
A.K. Smith, Ecology IAMIT Representative

Approval: DAVID EINAN Digitally signed by DAVID EINAN
Date: 2020.08.13 16:30:01 -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, due to the current Phase 1 Remobilization process stemming from 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 (BRA) for Waste Management Area (WMA)-C

Three of four IAMIT Determinations have been signed on this issue. The Parties agreed the remaining Groundwater Determination (2019-007) was ready for signature. MSA took the action to route the determination to the Parties for approval. This item will be closed at the IAMIT level when the IAMIT Determination is approved.

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 Operable Unit Landfills”

The Parties reached agreement to add milestone M-015-93C into the M-091 milestone series negotiations to synchronize the burial ground Remedial Investigation/Feasibility Study (RI/FS) work with the radioactive solid waste retrieval. DOE has the action to schedule a meeting with Ecology and to provide the draft TPA change control forms or enter into an Agreement in Principle to negotiate these milestones. This item will be tracked at the IAMIT level in the interim.

2.1.3 Possible Adoption of the Principles and Parameters in Regulatory Documents

At the May 26, 2020 IAMIT meeting, the Parties agreed the Principles and Parameters Working Group would resume meetings.

Ecology indicated an electronic mail (email) was distributed to the working group prior to this IAMIT meeting and mentioned there are updates the working group needs to make to the draft Principles and Parameters guiding document (DOE/RL 2019-46) in order to add it into Appendix F, “Supporting Technical Plans and Procedures” of the TPA. One update is editorial changes.

Inter-Agency Management Integration Team Meeting Minutes
June 18, 2020

Second, is the need to add transitional language, for example, standardized language for RI/FS and RCRA Facility Investigation (RFI)/Corrective Measures Study (CMS) work plans. The third update Ecology proposed is adding an additional regulatory description for the Single-Shell Tank (SST) waste management areas. For example, the document refers to a point of compliance. The point of compliance is used for determining whether groundwater cleanup has been accomplished. Ecology suggested reviewing these proposed updates with the working group, to include going through the edits in real-time and finishing this work by August 13, 2020, one week before the August IAMIT, scheduled for August 20, 2020. Ecology would then like to move forward with a change control form to incorporate the Principles and Parameters document as a standalone in Appendix F of the TPA.

DOE agreed with Ecology's proposal and stated if Ecology would like to make edits so it better fits into the TPA, DOE is willing to consider it. However, DOE indicated the Principles and Parameters Working Group is almost in agreement and a Kaizen is not needed at this point. Ecology proposed a Kaizen during the May 26, 2020 IAMIT meeting.

EPA agreed with Ecology's proposal.

Ecology stated they received feedback during a working group meeting about the efficiency and effectiveness of the primary document review and comment process. Ecology indicated they would like to improve this process and proposed doing a Kaizen on the review and approval process between DOE and Ecology on DOE-ORP documents to improve the flow and make it more effective. Although, the Kaizen is now a separate item and issue that would be discussed outside of the IAMIT.

The Parties agreed that the Principles and Parameters guiding document/procedure would be added to Appendix F of the TPA and an accompanying IAMIT Determination would be drafted to ensure the Appendix F procedure is followed. Ecology took the action to review the Principles and Parameters procedure. The Principles and Parameters Working Group has until August 13, 2020 to draft a change control form to incorporate the Principles and Parameters procedure into Appendix F of the TPA and draft the IAMIT Determination for the IAMIT's review prior to the August 20, 2020 IAMIT meeting. This action will be tracked at the IAMIT level in the interim.

The Parties also agreed to conduct a Kaizen to address Ecology's primary document comment/response process for efficiency and effectiveness between Ecology and DOE-ORP, with the improvement then applied to the WMA-A/AX closure process. DOE stated it would update the IAMIT at the July 16, 2020 meeting on its willingness to participate and/or the scope of the Kaizen. This action will be tracked separate from Principles and Parameters.

2.1.4 Changes/Updates to TPA Paragraphs 148/149

The Parties are under an Agreement in Principle (AIP) to negotiate updates to paragraphs 148 and 149 through July 31, 2020.

At the May 26, 2020, MSA took the action to coordinate getting the appropriate agency personnel together to meet and negotiate changes. DOE stated this action has been stalled for several reasons and will take the lead in getting things moving.

Inter-Agency Management Integration Team Meeting Minutes
June 18, 2020

EPA responded by saying it needs to include more than just the attorneys. The technical staff from the agencies who are the lead negotiators need to be included.

DOE agreed with EPA's suggestion to include the agencies' technical personnel in the negotiations.

The action is with MSA to schedule the next negotiation meeting (technical staff and attorneys included). This item will be tracked at the IAMIT level in the interim.

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

At the April 16, 2020 IAMIT meeting, DOE took the action to provide an update to the IAMIT on D4 planning efforts once the site is able to resume normal operations and pending Hanford prime contracts' transition.

DOE spoke about the volumes of debris compared to the volumes of contaminated soil that will go into ERDF. There will be a much higher volume of contaminated soil than debris. DOE plans to provide the IAMIT an update on this effort later this summer.

EPA stated that is another reason why the RASCAL Team was formed, to expedite the decision-making process.

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

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

On June 1, 2020, the Parties approved IAMIT Determination 2020-001, Deletion of Audio Files after TPA Meeting Minutes are Signed/Approved. This item is considered closed at the IAMIT level.

2.1.7 IAMIT Determination – Temporary Suspension of TPA Article XXXIII, Notification Requirements

At the end of March 2020, the Parties agreed a change was necessary to the TPA, Legal Agreement, Part Five, Common Provisions, Article XXXIII, Notification, which states that documents sent between the Parties will be sent by certified or overnight express mail, or hand-delivered. Due to the coronavirus, personnel are currently unable to process mail or hand-deliver documents. On May 26, 2020, the Parties agreed to an additional 10-week extension in suspending these requirements with an approved IAMIT Determination 2020-005, which expires on July 31, 2020. Dependent on the status and Hanford Site posture due to COVID-19, another extension may be warranted. This item will be tracked at the IAMIT level in the interim.

2.1.8 Update of TPA Appendix B: Listing of Treatment, Storage, and Disposal Groups/Units

At the May 26, 2020 IAMIT meeting, DOE took the action to discuss its available resources for working on the Appendix B update, if this effort would be considered a priority, and report back to the IAMIT. The Parties agreed this is lower priority work and will address updating Appendix

Inter-Agency Management Integration Team Meeting Minutes
June 18, 2020

B in the next TPA Five-Year Review and would stop tracking. This item is considered closed at the IAMIT level.

2.2 Status Updates

2.2.1 Draft Agreement in Principle: Revising and Updating TPA Appendices H and I

There was no update provided. At the October 17, 2019 IAMIT meeting, 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 meeting, the Parties agreed the draft Budget Agreement in Principle (AIP) should be placed on hold pending results of the “Representative Analogous Waste Site Coordinating Agency Liaisons (RASCAL)” team briefings and path forward.

At the May 26, 2020 IAMIT meeting, the Parties agreed to draft an IAMIT Determination and White Paper which will provide and document the RASCAL Team’s recommendations for expediting remedial cleanup on the Hanford Site Central Plateau.

The RASCAL Team drafted and provided to the IAMIT for review the IAMIT Determination 2020-006, “RASCAL Recommendations for Expediting Remedial Cleanup on the Hanford Central Plateau.” The Parties agreed with the recommendations the RASCAL Team made and agreed to sign the IAMIT Determination.

Ecology suggested if the RASCAL recommendations were approved, the Parties have an opportunity to move forward with milestone negotiations.

EPA commented that the budget-impacted milestones along with the RASCAL recommendations are all interrelated and should be considered and negotiated holistically.

Therefore, the Parties agreed a new AIP should be drafted to address RASCAL Team milestones and others that were previously to be addressed in the draft “Budget AIP” that was placed on hold. MSA took the action to draft the AIP. 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.

3.0 UPCOMING TOPICS/ACTION ITEMS FOR FUTURE IAMIT MEETINGS

3.1 Borrow Source for Silt Loam Soil Material for Engineered Barriers

At the May 26, 2020 IAMIT Meeting, Ecology requested DOE provide a briefing on the borrow source for silt loam soil material for engineered barriers.

DOE stated they have had conversations internally and with Ecology and are looking at what they currently need for covers as they move forward with engineered barriers. DOE indicated this would be a fairly significant effort to find borrow source material so they would like to wait for contract transition to evaluate and discuss this topic further.

Ecology indicated they would like to continue tracking this item at the IAMIT level as they believe it is a looming issue for re-issuing the Hanford site-wide permit, because some of the closure plans are dependent on really significant amounts of borrow material as we move forward with the Central Plateau cleanup.

DOE is still gathering information on this topic. The IAMIT will continue to track this item.

3.2 Practical Quantitation Limit (PQL) Changes/Potential Effect on Sampling and Analysis Plans

EPA brought up a new topic regarding changes to some of the methods that have resulted in some of the PQLs being changed. By using these methods, some of the actual regulatory limits could be exceeded and the Parties would not necessarily know it by the sampling and analysis. EPA asked Ecology to provide an example of what the issue is.

Ecology stated an example of the issue is with ECF-Hanford-18-0058, *Practical Quantitation Limits for Groundwater Environmental Samples*, where there are PQL changes, which can potentially affect the Sampling and Analysis Plans (SAPs). This is mainly assessing the polycyclic aromatic hydrocarbons (PAH), which are an organic constituent.

DOE asked for clarification, stating that Ecology was talking about PAHs and EPA Method 8270, Semivolatile Organic Compounds.

Ecology responded that the PQL used to be 0.5 and now it is up to 10.5, exceeding the cleanup levels for those organics. If the PQLs are too high, the Parties will not know if the cleanup levels will be met for clean up or close out, or these types of characterizations. This information needs to be addressed with the laboratory analytical methods that are being used right now.

EPA stated this issue is not going to hold up any Deactivation and Demolition SAPs, but it is currently holding up some remedial action related SAPs.

DOE took the action to investigate the changes and reconvene with the IAMIT in July to discuss. This item will be tracked at the IAMIT level in the interim.

Inter-Agency Management Integration Team Meeting Minutes
June 18, 2020

3.3 Representative Analogous Waste Site Coordinating Agency Liaisons (RASCAL)

At the May 26, 2020 IAMIT meeting, the IAMIT chartered the RASCAL Team to draft an IAMIT Determination and White Paper that will provide and document the RASCAL Team's recommendations for expediting remedial cleanup on the Hanford Site Central Plateau.

The RASCAL Team drafted and provided to the IAMIT for review, IAMIT Determination 2020-006, "RASCAL Recommendations for Expediting Remedial Cleanup on the Hanford Central Plateau."

Ecology noted that DOE added a late comment to incorporate Principles and Parameters into the IAMIT Determination.

DOE acknowledged this comment and stated they have been trying to get Principles and Parameters for a long time and thought this would be a good place to actually help move it forward. DOE also indicated they would be making changes to work plans per the RASCAL path forward and wanted to start referencing Principles and Parameters in the documents.

Ecology stated the Principles and Parameters Working Group has self-imposed an August 13, 2020 due date to have a draft change control form and draft IAMIT Determination prepared and presented to the IAMIT for review and then discussed during the August 20, 2020 IAMIT meeting. The change control form would incorporate the Principles and Procedures document into Appendix F of the TPA.

DOE agreed with this path forward and stated the reference to Principles and Parameters could be removed from the RASCAL IAMIT Determination. All Parties agreed the IAMIT Determination could be signed. MSA took the action to route the RASCAL IAMIT Determination to the Parties for approval.

The Parties agreed that the Principles and Parameters guiding document/procedure would be added to Appendix F of the TPA and an accompanying IAMIT Determination would be drafted to ensure that the Appendix F procedure is followed. The Principles and Parameters Working Group has the action to draft the change control form and IAMIT Determination.

Ecology also committed to a 2-week review of the Principles and Parameters document, having a draft redline to the Working Group for review.

EPA stated the Parties needed to ensure there is adequate Principles and Parameters language added into the IAMIT Determination, which would reinforce using Principles and Parameters when modifying and developing future work plans.

The Parties also agreed that a new Agreement in Principle (AIP) should be drafted to address RASCAL Team milestones and others that were previously to be addressed in the draft "Budget AIP" that was never signed. MSA took the action to draft the AIP.

DOE expressed appreciation to the RASCAL Team, stating it was a good initiative, and in fact, one of the best in some time. DOE also noted that the initiative was done really quickly, considering what was being done.

Ecology echoed appreciation for the RASCAL Team's work stating it was a great piece of work, really creative thinking, and a great way to get cleanup done that otherwise would not happen.

Inter-Agency Management Integration Team Meeting Minutes
June 18, 2020

EPA also echoed appreciation for the RASCAL Team’s work stating it is very important and they are looking forward to seeing it implemented.

3.4 Waste Management Area (WMA) C Milestones

Ecology brought up a new topic regarding the WMA C milestones that Ecology and DOE have been informally negotiating for about 3 years. Ecology suggested the Parties enter into an AIP to negotiate these milestones formally.

DOE committed to updating the IAMIT in July on its willingness to enter into an AIP to negotiate the WMA C milestones with Ecology.

4.0 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 6/18/20 IAMIT Meeting
1	Baseline Risk Assessment for WMA-C IAMIT Determinations	MSA took the action to route the Groundwater IAMIT Determination to the Parties for approval.
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 has the action to schedule a meeting with Ecology and to provide the draft TPA change control forms or enter into an Agreement in Principle to negotiate the M-091 series, to include milestone M-015-93C.
3	Possible Adoption of the Principles and Parameters in Regulatory Documents	Ecology committed to a 2-week review of the Principles and Parameters document having a draft redline to the Working Group for review. The Principles and Parameters Working Group has until August 13, 2020 to draft a change control form to incorporate the Principles and Parameters procedure into Appendix F of the TPA and draft the IAMIT Determination for the IAMIT’s review prior to the August 20, 2020 IAMIT meeting.
4	Changes/Updates to TPA Paragraphs 148/149	Action is with MSA to schedule the next negotiation meeting (technical staff and attorneys included).

Inter-Agency Management Integration Team Meeting Minutes
June 18, 2020

No.	IAMIT Topic	Actions from 6/18/20 IAMIT Meeting
5	Agreement in Principle: TPA Changes in Response to Federal Fiscal Year 2018 and 2019 Budgets	The Parties agreed a new AIP should be drafted to address RASCAL Team recommendations and milestones that were previously to be addressed in the draft "Budget AIP" that was placed on hold. MSA took the action to draft the AIP.
6	Borrow source for silt loam soil material for engineered barriers	DOE plans to discuss internally, considering recent events and its available resources between now and June, and may consider possibly briefing the IAMIT in July.
7	DOE-ORP and Ecology to conduct a Kaizen on the efficiency and effectiveness of the primary document review and comment process	MSA will explore the possibilities and the logistics of a Kaizen to talk about Ecology's review and comment process on primary documents, specifically as it relates to WMA A/AX closure.
8	PQL Changes/Potential Effect on Sampling and Analysis Plans	DOE took the action to investigate the changes and reconvene with the IAMIT in July to discuss.
9	Waste Management Area (WMA) C Milestones	DOE committed to updating the IAMIT in July on its willingness to enter into an AIP to negotiate the WMA C milestones with Ecology.

The next IAMIT meeting is scheduled for July 16, 2020.

5.0 LIST OF ATTENDEES

Becker, David	CHPRC
Bergman, Theresa	CHPRC
Brasher, Stephanie	MSA
Cameron, Craig	EPA
Capron, Jason	DOE
Cline, Michael	DOE
Davis, Scott	MSA
Day, Bert	DOE Consultant with Bert Day Consulting, LLC
Einan, Dave	EPA
Fox, Randal	CHPRC
French, Mark	DOE
Frohling, Elyse	CHPRC

**Inter-Agency Management Integration Team Meeting Minutes
June 18, 2020**

Hamel, Bill	DOE
Hastings, Rob	DOE
Higgins, Kathy	DOE
Hildebrand, Doug	DOE
Kytola, Kevin	DOE Consultant with Sapere Consulting Inc.
Lobos, Rod	DOE
Lopez, Maria	WRPS
Menard, Nina	Ecology
Price, John	Ecology
Smith-Jackson, Noel	Ecology
St. John, David	CHPRC
Teynor, Tom	DOE
Turner, Michael	MSA
Welsch, Kim	Ecology