



**Inter-Agency Management Integration Team (IAMIT)  
Meeting Minutes  
March 21, 2019**

---

---

Approval:  Date: 5/7/19

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

Approval:  Date: 4/15/19

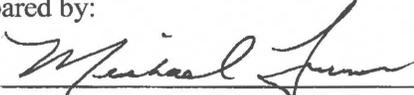
**W.F. Hamel**  
*DOE-RL IAMIT Representative*

Approval:  Date: 4/29/19

**R.G. Hastings**  
*DOE-ORP IAMIT Representative*

Approval:  Date: 5/2/19

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

Minutes Prepared by:  Date: 4/10/19

**M.J. Turner**  
*Mission Support Alliance*

**Tri-Party Agreement (TPA) Inter-Agency Management Integration Team (IAMIT)**  
**Meeting Minutes**  
**March 21, 2019**

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

**Table I. Actions Items**

- A) Baseline Risk Assessment for WMA-C - MSA noted that presentations were given during the February 21, 2019 IAMIT, and Ecology was to follow up with a status update. Ecology stated that a meeting is scheduled April 9, 2019 with the EPA Region 10 Risk Assessor to discuss EPA's interpretation of the guidelines, and following that discussion, Ecology will provide an update. This action remains open.
  
- B) M-015-93C Dispute – Initiate Characterization Field Work for 200-SW-2 OU Landfills  
DOE-RL stated that the dispute has been extended to the end of April 2019. This action remains open.

**Table II. Status Updates**

- A) TPA Five-Year Review – EPA stated that it is still in the process of obtaining comments from its lawyer regarding paragraphs 148/149, and the intent is to have the comments by the next IAMIT. MSA inquired about the status of updates to Appendix H and I, and TPA Section 11.8. Ecology responded that there were no updates, and it would be bundling the updates together for Appendix H/I and Section 11.8. MSA noted that the System Plan negotiations will inform these TPA updates. This action remains open.
  
- B) Milestone M-037-10/Closure Actions for Five Specified TSDs, aka “Coordinated Closure” Ecology stated that its legal review had been completed, and there was a question as to where the action currently resides. DOE-RL stated that it would determine which agency had the responsibility for this action. This action remains open.
  
- C) Modifications to TPA Section 9.4, “Administrative Record,” to Eliminate Hard Copy Requirements – MSA stated that status of this action continues as indicated on the action tracking table, which is for MSA to complete the upgrade to the AR in the third quarter of FY 2019. This action remains open.
  
- D) Agreement in Principle for the Negotiation of HHFACO Revisions in Response to Federal Fiscal Year (FFY) 2018 Appropriation and FFY 2019

President's Budget – MSA noted that there is a suite of milestones in the M-015, M-016 and M-085 series that are all under an Agreement in Principle (AIP). Ecology stated that it has been working with EPA to revise the language in the AIP, and then it will provide DOE-RL with the revised AIP. This action remains open.

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

A) There were no recently closed actions. DOE-RL stated that there were a number of issues presented during the February 21, 2019 IAMIT, and DOE-RL was to follow up with the respective management to discuss a path forward. Ecology suggested waiting until after the April 9, 2019 meeting with the EPA Region 10 Risk Assessor before following up on the issues that were presented at the last IAMIT.

#### **2) Topic: Tank C-106 Dispute Status**

A) ORP provided the four parties (Ecology, EPA, DOE-RL, ORP) a copy of the formal dispute for C-106. MSA noted that there are 21 days at the IAMIT level to resolve the dispute. It was agreed that a meeting with the parties would be scheduled for next Thursday, March 28, 2019, to discuss the C-106 dispute.

#### **3) Topic: TPA Section 4.1 Project Manager Agreements/IAMIT Determinations**

A) MSA stated that during the TPA project manager meetings (PMMs) held three weeks ago for the Solid Waste Operations Complex (SWOC), WESF and M-091, the project managers agreed on what is to be presented for discussion during the PMMs. The project managers agreed to document the decision in a TPA IAMIT determination. MSA noted that as part of the TPA five-year review, Section 4.1 was reviewed, which covers topics for discussion during the PMMs. MSA stated that six IAMIT PMM determinations have been signed, and the three IAMIT determinations being presented for signature today for SWOC, WESF and M-091 represent the remaining DOE-RL PMMs.

#### **4) New Topics/Action Items for Next IAMIT**

A) IAMIT Determination Regarding Unfiltered and Filtered Groundwater Samples for Chrome – EPA stated that the technical team has discussed the issue, which is associated with the offsite lab that conducts the unfiltered sample analyses, and there is agreement on a path forward. Ecology noted that EPA and Ecology had agreed to sign a letter modifying the direction for unfiltered samples. EPA stated that its preference is to sign an IAMIT determination instead of a letter and present it for signature at the next IAMIT. DOE-RL added that the managers will be briefed on the

agreement before the IAMIT determination is signed. It was agreed to attach the IAMIT determination to the minutes of the next IAMIT meeting.

- B) Groundwater Recharge Rates/PCB Congeners – DOE-RL noted that a stand-alone IAMIT had been scheduled to discuss this topic on April 9, 2019, and presentations and position papers have been issued to both sides. DOE-RL stated that since the EPA Region 10 risk assessor is scheduled for a meeting on the same date, a new date is needed. It was noted that the regularly scheduled IAMIT on April 18, 2019 is the same date as the TPA Senior Executive Committee meeting. The parties agreed to tentatively schedule a combined stand-alone IAMIT and a regular monthly IAMIT on Wednesday, April 24, 2019.

DOE-RL noted that the M-015-93C/ 200-SW-2 dispute has been extended to April 30, 2019, and suggested including that topic for discussion on April 24. Ecology stated that the extension was a 21-day extension, and the dispute is still at the IAMIT level.

**5) Schedule for Upcoming IAMIT Meetings**

- A) The next IAMIT was tentatively scheduled for Wednesday, April 24, 2019 (see discussion under topic 4B).



**Inter-Agency Management Integration Team Meeting**  
**Thursday, March 21, 2019, 8:00 a.m.**  
 Department of Energy, 2420 Stevens Center Drive, Richland, WA

**Agenda**

No	Time	POC / Org	Topic
1	8:00 – 8:30 am	Turner, Michael, MSA	Review IAMIT Action Tracking Table <ul style="list-style-type: none"> <li>• M-015-93C Dispute Status</li> <li>• Baseline Risk Assessment for WMA-C Status</li> <li>• TPA 5-Year Review               <ul style="list-style-type: none"> <li>◦ Status on TPA Paragraphs 148/149 (Einan)</li> </ul> </li> <li>• Coordinated Closure Status</li> <li>• Administrative Record</li> <li>• Draft FFY2018-2019 Budget Tentative Agreement</li> </ul>
3	8:30 – 8:45 am	Hastings, Rob, ORP	Tank C-106 Dispute Status
4	8:45 – 8:50 am	Davis, Scott, MSA	TPA Section 4.1 Project Manager Determinations <ul style="list-style-type: none"> <li>• M-091</li> <li>• SWOC</li> <li>• WESF</li> </ul>
5	8:50 – 8:55 am	TPA Parties	New Topics/Action Items for Next IAMIT
6	8:55 am – 9:00 am	Turner, Michael, MSA	Schedule for Upcoming IAMIT Meetings
6	9:00 am		Adjourn

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

## March 21, 2019

---

### 4. Agreement in Principle for the Negotiation of HFFACO Revisions in Response to Federal Fiscal Year (FFY) 2018 Appropriation and FFY 2019 President's Budget

---

**Reference:** N/A

**Affected Milestones:** M-015-84, M-015-91B, M-015-92C, M-015-93B, M-015-98, M-015-99, M-015-112, M-016-255, M-016-256, M-085-70, M-085-80

**Originated:** 12/20/18

**Status:** Agreement in Principle and corresponding Tentative Agreement have been drafted

**Dispute Extended:** N/A

**Action:** Sign Agreement in Principle, enter into negotiations

**Comments:** These negotiations are driven primarily by requirements found in HFFACO, Legal Agreement, Paragraph 148.A, which requires DOE-RL to include in its annual budget request to the DOE Office of Environmental Management (DOE-EM) estimated funding levels required to achieve full compliance with HFFACO milestones. The FFY 2018 appropriation by Congress and the FFY 2019 President's budget request to Congress, respectively, were less than the DOE-RL estimated funding levels submitted to DOE-EM. HFFACO, Legal Agreement, Paragraph 149.G allows DOE-RL to propose changes to milestones in response to congressional budget appropriations that are less than estimated funding levels required to achieve full compliance. HFFACO, Legal Agreement, Paragraph 149.D states that DOE-RL shall assess the impacts of the President's budget on DOE-RL's ability to complete milestones on time.

At the December 20, 2018 IAMIT meeting, Ecology stated they had received drafts of the AIP and TA on December 19, 2018, were scheduled to meet with their attorneys to review them, and will respond back to DOE. At the January 31, 2019 IAMIT, Ecology stated EPA had been on furlough and needed to restart these discussions. [At the February 21, 2109 IAMIT, the Parties were asked for an update on status. There was no change in status.](#)

**Closed:**

---

### Table III. Recently Closed/Other Agreements

---

1. **None**

---

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

## March 21, 2019

---

### 2. Milestone M-037-10/Closure Actions for Five Specified TSDs, aka "Coordinated Closure"

---

**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, Sections 3.3, 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.

**Comments:** Via RCRA Permit Rev. 9 discussions, agencies have agreed that closure of land-based TSDs can be coordinated with surrounding OUs. Should milestone M-037-10 and TPA Sections 3.3 and 5.5 be altered, potential exists for TPA negotiations, tentative agreement and/or public comment.

**Closed:**

---

### 3. Modifications to TPA Section 9.4, "Administrative Record," to Eliminate Hard Copy Requirements

---

**Reference:** TPA Section 9.4

**Affected Milestones:** N/A

**Originated:** 11/15/18 (re-opened)

**Status:** Change Control Form P-09-18-01 has been drafted, is under review with DOE

**Dispute Extended:** N/A

**Action:** Sign Change Control Form

**Comments:** Change Control Form in draft, proposes eliminating the requirement to maintain hard-copy files in the Hanford Administrative Record. DOE has authorized an Administrative Record system upgrade. This upgrade will enhance search and retrieval capabilities, allow multi-field filtering, provide canned and ad hoc reporting functionality, enable electronic document submittal, and improve system response time. At the December 20, 2018 IAMIT meeting, Ecology indicated they would be ready to sign this change control form when the AR upgrade is complete. The system upgrade is planned to be completed during the [third](#) quarter of FY2019.

**Closed:**

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

## March 21, 2019

### Table II. Status Updates

---

#### 1. TPA Five-Year Review

---

**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 reprint 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 are scheduled to conclude by March 18, 2019. A decision to reprint must be made by July 31<sup>st</sup> to complete by the end of the fiscal year.

At the October 18, 2018 IAMIT meeting, EPA agreed to take the lead in coordinating a Paragraph 148/149 meeting to discuss EPA’s legal comments with the Parties for resolution.

At the December 20, 2018 IAMIT meeting, Ecology stated they have been discussing minor changes to Appendix I with ORP.

At the January 31, 2019 IAMIT, EPA requested the latest proposed changes to TPA Paragraphs 148/149. EPA agreed to review the draft change control form (L-16-01) and provide a status at the February IAMIT.

At the February 21, 2019 IAMIT, the Parties were asked for an update on proposed changes to TPA Paragraphs 148/149. There was no change in status. Action remains with EPA to provide comments.

**Closed:**

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

## March 21, 2019

\*New information shown in blue

### Table I. Action Items

---

#### 1. Baseline Risk Assessment for WMA-C

---

**Reference:** Phase II RCRA Facility Investigation for Waste Management Area C (RPP-RPT-58339)  
**Affected Milestones:** M-045-61 (completed)/TPA Appendix I  
**Originated:** 02/21/19  
**Status:** Open  
**Dispute Extended:** N/A  
**Action:** Parties are being asked to agree on the path forward/resolution for four specific areas of the WMA-C Performance Assessment/Baseline Risk Assessment: Judgmental Samples, Hazard Index, Groundwater Ingestion and Food Chain Pathway  
**Comments:** Presentations were given by Ecology and DOE at the February 21, 2019 IAMIT. At that meeting, Ecology requested more time to consider the issue.

---

#### 2. M-015-93C Dispute - Initiate Characterization Field Work for 200-SW-2 OU Landfills

---

**Reference:** DOE-RL Statement of Dispute (letter 19-SGD-0008)  
**Affected Milestones:** M-015-93C  
**Originated:** Dispute Initiated at PM Level on 7/9/18  
**Status:** Open  
**Dispute Due Date:** **IAMIT-level 4/4/2019 (or Director of Ecology 4/18/19)**  
**Action:** DOE-RL submitted its Statement of Dispute (SOD) to the IAMIT on 3/14/19. The IAMIT will serve as the forum for resolution of this dispute, the IAMIT currently has 21 days (until 4/4/19) to unanimously resolve this dispute. If the IAMIT is unable to unanimously agree on a resolution of this dispute, the Director of Ecology shall make a final written decision or written determination no more 35 days (until 4/18/19) after submission of the written SOD to the IAMIT (i.e. "Director's Determination").  
**Comments:**



*TPA Interagency Management Integration Team Meeting  
March 21, 2019*

<u>Name</u>	<u>Organization</u>
John Price	Ecology
Kathy Knox	court reporter
Alex Smith	Ecology
Stephanie Brasher	MSA
Eric VanMason	WRPS
Scott Davis	USA
Sara Austin	CHPRC
Craig Cameron	EPA
Cheryl Wheeler	Ecology
Dave Einar	EPA
Michael Cline	DOE/RL
H. Higgins	
Bill Campbell	DOE Hartford
<del>Eric Higgins</del>	ORP
Chris Kays	ORP
MARCEL BERGERON	WRPS
POD LOBOS	ORP
Jim Hansen	RL

