

**Meeting Minutes**  
**Inter Agency Management Integration Team (IAMIT)**  
**EPA Conference Room, 712 Swift Blvd., Richland**  
**June 22, 1999**

Appvl.: *Jackson King* Date: 8-24-99  
 for Peter M. Knollmeyer, RL (A5-11)  
 IAMIT Representative

Appvl.: *Douglas R. Sherwood* Date: 8/24/99  
 Douglas R. Sherwood, EPA (B5-01)  
 IAMIT Representative

Appvl.: *Michael A. Wilson* Date: 8/24/99  
 Michael A. Wilson, Ecology (B5-18)  
 IAMIT Representative

Prepared by  
 Appvl.: *RD Morrison* Date: 8/23/99  
 Ronald D. Morrison (A1-14)  
 Fluor Daniel Hanford, Inc.

**Distribution**

Abdul, W.	RL	S7-54	Piippo, R. E.	FDH	A5-15
Black, D. G.	WMH	H6-20	Price, S. M.	FDH	H6-23
Blazek, M. L.	ODOE	OR*	Rasmussen, J. E.	RL	A5-15*
Borneman, L. E.	FDH	A3-03	Rogers, L. E.	RL	R3-79
Bowers, E. M.	RL	S7-55	Romine, L. D.	RL	R3-79
Clark, C. E.	RL	A5-15	Royack, M. J.	RL	S7-54
Crawford, G. L.	ESG	B1-44	Sanders, G. H.	RL	A5-15*
Cusack, L.	Ecology	B5-18*	Sherwood, D. R.	EPA	B5-01*
Einan, D. R.	EPA	B5-01	Skinnarland, E. R.	Ecology	B5-18
Hertzal, J. S.	FDH	H8-67	Sobczyk, S.	Nez Perce	
Hopkins, A. M.	FDH	N1-26	Stanley, R.	Ecology	Lacey*
Jaraysi, M.	Ecology	B5-18*	Tilden, H. T.	PNNL	P7-79
Jarvis, M. F.	RL	A5-15	Ward, D. C.	RL	A5-15
Jim, R.	YIN		Wilkinson, J. R.	CTUIR	
Kjarmo, K. J.	E2	A1-14	Wilson, M. A.	Ecology	B5-18*
Knollmeyer, P. M.	RL	A5-11	Yasek, R. M.	RL	S7-54
Mecca, J. E.	RL	A5-11	Yerxa, J. K.	RL	A5-15
Miskho, A. G.	FDH	H6-06	Yokel, J. W.	Ecology	B5-18
Morrison, R. D.	FDH	A1-14*	EDMC/ Administrative Record		H6-08
Murphy-Fitch, E. J.	FDH	A1-14*			

\* W/Attachments

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 JUN 25 2007

**EDMC**

**Inter Agency Management Integration Team  
EPA Conference Room  
712 Swift Blvd., Richland  
June 22, 1999**

**Quality Assurance Changes to the Tri-Party Agreement**

D. Sherwood initiated the discussion stressing that the developing quality assurance changes to the Hanford Federal Facility Agreement and Consent Order (Agreement) should proceed and additionally pointed out that a joint "Multi-Agency Radiation Survey and Site Investigation Manual" needs to be added to the Agreement as well. D. Sherwood went on to state that this manual has been approved by the U. S. Environmental Protection Agency (EPA), the U. S. Department of Energy (DOE) and the Nuclear Regulatory Commission and as such needs to be added to the Agreement as a guidance document.

The DOE took the action to assign a DOE lead on this issue and to contact the EPA and the State of Washington Department of Ecology (Ecology) and work the above recommendation.

**Land Disposal Restrictions Notice of Correction**

(L. Ruud participation by telephone conference)

G. Sanders pointed out that the purpose of this agenda item is for the agencies to state their respective positions.

E. Bowers stated that the DOE received a Notice of Correction (NOC) related to the Annual Land Disposal Restrictions Report on June 4, 1999. The DOE believes this matter should be resolved under the Agreement and has initiated dispute resolution. Ecology has responded that their agency does not concur that this is a disputable matter under the Agreement.

L. Cusack stated that Ecology believes Agreement Action Plan Section 9.0 gives Ecology the right to step outside of the Agreement to deal with this matter. Ecology legal council is reviewing the matter. Regardless, the items noted in the NOC will remain as issues. Pending the conclusion of legal council's review, Ecology will act accordingly based upon their review.

G. Sanders added that the Agreement constitutes a Site Treatment Plan under the Federal Facilities Compliance Act and that 3 of the issues in the NOC are related to the Agreement and should be pursued under the Agreement.

L. Cusack asked if the DOE disagreed with the items in the NOC.

G. Sanders responded the DOE is investigating the issues in the NOC and they will be addressed appropriately. But, the issues should be addressed via the provisions of the Agreement and as such the DOE will deliver a Statement of Dispute to Ecology by July 9, 1999 per the

requirements of the Agreement. Alternatively, we could extend the dispute deadlines until the next IAMIT meeting in July.

L. Ruud responded that Ecology staff will be meeting with legal council and will know more at that time and will address any possible extension of the alleged dispute at that point.

D. Sherwood added that another subject which appears to be very closely related is the M-91-10 and M-19 Project Management Plan and associated change request. Whatever solution is arrived at for M-91 will be relevant to this issue.

#### **M-45 Vadose Zone/ M-41 SST Stabilization Consent Decree**

G. Sanders stated that the public comments and transcripts of the May 12, 1999 public meeting have been compiled in one package by Roger Stanley.

R. Stanley explained that the package comprises all comments he has received or is aware of and requested that if anyone is aware of any additional comments please contact him as soon as possible. R. Stanley added that Ecology, the Attorney Generals Office and the Department of Justice do not wish to have the finalization of the M-45 Corrective Action change request delay the finalization of the M-41 change request and the associated Consent Decree.

G. Sanders stated that addressing the comments separately for the two different areas should not represent a problem for the DOE.

D Sherwood asked what the significant comments/issues were on the M-45 package.

G. Sanders responded that he was not aware of any significant issues but the comments are lengthy and will need to be considered carefully. The DOE and Ecology may need to schedule a separate meeting to work through the details.

D. Sherwood stated that it may be more difficult to issue multiple comment response documents and may be more efficient to respond to all comments in one document.

G. Sanders proposed a planning meeting for June 29, 1999 to review the comments and explore the possible options for finalizing the change packages.

L. Pacheco updated the attendees on progress in single shell tank stabilization activities. The last of the 3 required tank pumping starts was completed with the start of pumping in tank S-103 on June 11, 1999. Completion of this activity meets Consent Decree commitment D-01-02 which is due July 30, 1999.

**C-106 Tank Retrieval Change Request M-45-99-01**

W. Abdul provided copies of Agreement change request M-45-99-01 (Attachment 1) and summarized the background and main points of the change request.

D. Sherwood stated that the change request, as part of the criteria for completion, should specify that future water additions will no longer be necessary.

W. Abdul responded that although there is some uncertainty in this, it may be possible to add the requirement.

R. Stanley stated that Ecology would like to work on the change request further and asked if the DOE intended for this change request to resolve the underlying dispute resolution?

G. Sanders responded that the intent of this change request is stated in the first paragraph of change request M-45-99-01 (Attachment 1).

D. Holland added that Ecology is currently reviewing the subject change request and will be responding to the DOE.

**224-T TRUSAF Agreement in Principle**

Attachment 2 "Hanford Federal Facility Agreement and Consent Order (Agreement) Negotiation of Commitments for the 224-T Facility" was presented and approved by the DOE, EPA and Ecology IAMIT representatives.

**AGENDA  
INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT)  
MEETING**

**June 22, 1999  
1:00 PM – 2:15 PM**

**EPA CONFERENCE ROOM  
712 SWIFT BLVD., SUITE 5**

**(CHAIRPERSON: D. R. Sherwood)**

**1:00 pm QUALITY ASSURANCE CHANGES TO THE TRI-PARTY AGREEMENT  
(H. Rodriguez, M. Jarvis, J. Yokel, D. Einan)**

**1:15 pm LAND DISPOSAL RESTRICTIONS NOTICE OF CORRECTION  
(E. Bowers, L. Cusack)**

**1:30 pm M-45 VADOSE ZONE/M-41 SST STABILIZATION CONSENT DECREE  
(J. Poppiti, D. Bryson, R. Stanley)**

**1:45 pm C-106 TANK RETRIEVAL CHANGE REQUEST M-45-99-01  
(W. Abdul, R. Stanley)**

**2:00 pm 224-T TRUSAF AGREEMENT IN PRINCIPLE  
(L. Rogers, M. Jarayssi)**

**2:15 pm ADJOURN**

ATTENDEES

INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) MEETING

DATE: 6/22/99

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>	<u>(✓) FOR ATTACHMENTS</u>
<u>RD MORRISON</u>	<u>FDH / TPA</u>	<u>A1-15</u>	<u>✓</u>
<u>R. E. P. / P. O.</u>	<u>FDH / TPA</u>		
<u>Rm Skinnadahl</u>	<u>Ecology</u>		
<u>Julie Yorkel</u>	<u>Ecology</u>		
<u>ROGER STANLEY</u>	<u>Ecology</u>		
<u>Doug Sherwood</u>	<u>EPA</u>	<u>B5-01</u>	<u>✓</u>
<u>PETE KNOLLMEYER</u>	<u>DOE-RL</u>	<u>A5-11</u>	
<u>Cliff Clark</u>	<u>DOE-RL</u>	<u>A5-15</u>	
<u>Dave Einar</u>	<u>EPA</u>	<u>B5-01</u>	
<u>LA M. P. / P. O.</u>	<u>Ecology</u>		<u>✓</u>
<u>George H. Sanders</u>	<u>DOE-RL</u>	<u>A5-15</u>	<u>✓</u>
<u>James E. Rasmussen</u>	<u>DOE-RL</u>	<u>A5-15</u>	
<u>Mary Jarvis</u>	<u>DOE-EAP</u>	<u>A5-15</u>	
<u>JON YERXA</u>	<u>DOE-EAP</u>	<u>A5-15</u>	

ATTENDEES

INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) MEETING

DATE: 6/22/99

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>	<u>(✓) FOR ATTACHMENTS</u>
<u>Harold Tilden</u>	<u>PNNL-EMS</u>	<u>P7-79</u>	
<u>George Crawford</u>	<u>FDH TPA Integration</u>		
<u>Dana Ward</u>	<u>DOERL EAP</u>	<u>A-5-15</u>	
<u>Sue Price</u>	<u>FDH - Env. Prot.</u>	<u><sup>H</sup><del>A6</del>-23</u>	
<u>Dale Black</u>	<u>WMH - Env. Services</u>	<u>H6-20</u>	
<u>Lucinda Bernaman</u>	<u>FDH <del>ERP</del> <sup>RPP</sup></u>	<u>A3-03</u>	
<u>ED SCHWIER</u>	<u>FDH QA</u>	<u>B1-13</u>	
<u>Doug Hunter</u>	<u>OUE</u>		
<u>Elizabeth Bonner</u>	<u>DOE-RL/OPD</u>	<u>S7-55</u>	
<u>Stan Sobczyk</u>	<u>Mer Perce ERWM</u>		
<u>ROB YASEK</u>	<u>DOE/ORP</u>	<u>S7-54</u>	
<u>Jim Thompson</u>	<u>DOE/ORP</u>	<u>S7-54</u>	
<u>Michael J. Royack</u>	<u>DOE/ORP /OPD</u>	<u>S7-54</u>	
<u>Wahed Abdul</u>	<u>DOE/ORP /OPD</u>	<u>S7-54</u>	





Department of Energy  
 Richland Operations Office  
 P.O. Box 550  
 Richland, Washington 99352

99-EAP-322

JUN 03 1999

Mr. Michael A. Wilson, Program Manager  
 State of Washington  
 Department of Ecology  
 P. O. Box 47600  
 Olympia, Washington 98504

Dear Mr. Wilson:

**ADDITION OF HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER  
 (TRI-PARTY AGREEMENT) INTERIM MILESTONE M-45-03B, "COMPLETE SLUICING  
 RETRIEVAL OF TANK 241-C-106 SLUDGE"**

In reference to the letter from T. Fitzsimmons, State of Washington Department of Ecology (Ecology) to J. D. Wagoner, U.S. Department of Energy (DOE), Richland Operations Office (RL), entitled "Final Determination Pursuant to Tri-Party Agreement in the Matter of the Disapproval of the DOE Change Control Form M-45-97-03," dated October 8, 1997, this letter transmits Tri-Party Agreement Change Control Form M-45-99-01, which proposes the addition of interim milestone M-45-03B, "Complete Sluicing Retrieval of Tank 241-C-106 Sludge" due December 31, 1999. The sluicing schedule has been accelerated based on the experience gained through a series of successful sluicing process tests in 241-C-106. The project completion schedule is contingent upon several risks and assumptions, which may impact the successful implementation of this schedule. The critical assumptions and risks have been attached for your information. (Attachment 2)

It is RL's intent that the establishment of this interim milestone will close item (C) from Ecology's final determination letter on this matter. If you have any questions, please contact Wahed Abdul, Operations Program Division on (509) 372-2355, or Hector Rodriguez, of my staff, on (509) 376-6421.

Sincerely,

George H. Sanders, Administrator  
 Hanford Tri-Party Agreement

EAP:HMR

## Attachments

cc w/attachs:  
 J. R. Wilkinson, CTUIR  
 S. E. Dahl, Ecology  
 T. Valero, Ecology  
 R. F. Stanley, Ecology  
 D. R. Sherwood, EPA

J. S. Hertz, FDH  
 A. M. Umek, FDH  
 D. Powaukee, NPT  
 M. L. Blazek, OOE  
 R. Jim, YIN

Change Number <b>M-45-99-01</b>	<b>Federal Facility Agreement and Consent Order Change Control Form</b> <small>Do not use blue ink. Type or print using black ink.</small>	Date <b>May 21, 1999</b>
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Originator <b>G. H. Sanders</b>	Phone <b>376-6888</b>
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Class of Change	<input type="checkbox"/> I - Signatories	<input checked="" type="checkbox"/> II - Executive Manager	<input type="checkbox"/> III - Project Manager
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Change Title	<b>Add Tri Party Agreement Interim Milestone M-45-03B.</b>
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**Description/Justification of Change**

This M-45-99-01 change request constitutes resolution of the matter of the U. S. Department of Energy (DOE) failure to complete the requirements of Tri Party Agreement interim milestone M-45-03A: Initiate sluicing retrieval of tank 241-C-106 to resolve the high heat safety issue and demonstrate waste retrieval. by the due date of October 31, 1997. Interim Milestone M-45-03A was completed on November 18, 1998.

**Compliance Issue Description**

Interim milestone M-45-03A was established in January 1994 as a key tank waste remediation system (TWRS) project requirement. Work required to meet M-45-03A has long been recognized as of primary importance in that it both: a) provides for resolution of tank C-106 high heat safety (and environmental) issues via waste transfer to more appropriate facilities, and b) represents a critical test and demonstration of waste retrieval technologies, and an important first step in building DOE's ability to retrieve Hanford tank wastes for processing. DOE progress in meeting M-45-03A requirements was slowed for various reasons to the point where DOE was unable to meet the milestone due date of October 31, 1997.

On May 6, 1997, DOE requested extension of the due date for Interim Milestone M-45-03A from October 31, 1997 to September 30, 1998 (Ref. 1). The request was denied by Ecology on May 20, 1997 (Ref. 2), and DOE subsequently invoked the dispute provisions of the Tri-Party Agreement on May 27, 1997 (Ref. 3). The request was denied by the Director of Ecology in a final determination on October 8, 1997 (Ref. 4). The DOE exercised its right to appeal the Director of Ecology's determination to the State of Washington Pollution Control Hearings Board (PCHB). The DOE subsequently chose not to pursue any further appeals in this matter.

(cont.)

**Impact of Change**  
Approval of this change request amends Tri Party Agreement tank 241-C-106 requirements consistent with current TWRS program logic and planning.

**Affected Documents**  
Hanford Federal Facility Agreement and Consent Order, Appendix D, as amended.

<b>Approvals</b>		
_____	_____	___ Approved ___ Disapproved
DOE	Date	
_____	_____	___ Approved ___ Disapproved
EPA	Date	
_____	_____	___ Approved ___ Disapproved
Ecology	Date	

**Description/Justification of Change (cont.)**

In light of the preceding, Ecology and DOE agree as follows:

- A. That Tri Party Agreement interim milestone M-45-03A is not modified.
- B. That the following new Tri Party Agreement requirement is established by approval of this M-45-99-01 change request:
- M-45-03B: Complete Sluicing Retrieval of Tank 241-C-106 Sludge: December 31, 1999**
- (See note for determination of completion of sluicing)
- C. That DOE's Assistant Manager for TWRS will forward bimonthly letter reports to Ecology's TWRS Project Manager describing 241-C-106 project actions taken pursuant to the TWRS program schedule, and whether or not DOE has/is maintaining adequate progress and compliance with Interim Milestone M-45-03B.
- D. That should DOE, at any time, determine that it is no longer maintaining adequate progress and compliance with Interim Milestone M-45-03B, it shall immediately notify Ecology of such failure in writing.
- E. In view of the addition of Interim Milestone M-45-03B to the Agreement, and DOE's agreement to perform actions as stated in paragraphs B, C, and D preceding, Ecology agrees to not assess penalties, stipulated or otherwise, against DOE for violating M-45-03A.

**NOTE:**

Sluicing retrieval for this milestone will be completed when at least 95 percent (~187,000 gallons) of the estimated total sludge of 6 feet has been removed from tank 241-C-106, as defined in the original Tank 241-C-106 Sluicing Project Justification of Mission Need (J.E. Lytle, U.S. Dept. of Energy, Washington, DC, August 18, 1993). However, after the high heat safety issue is resolved (~3 feet of sludge removal), if the rate of sludge removal slows down to less than 10,000 gallons (~approximately 4 inches of sludge removal) per 12-hr sluice batch for 3 consecutive batches, the limit of sluicing retrieval capability shall be considered reached and the sluicing retrieval for this milestone shall be considered complete.

**References**

1. Letter, G. Sanders, RL, to M. Wilson, Ecology, "Request to Change Due Date for Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Interim Milestone M-45-03A," dated May 6, 1997.
2. Letter, M. Wilson, Ecology, to J. Kinzer and G. Sanders, RL, "RE: Change Package M-45-97-03 and Letter Number 97-WDI-058," dated May 20, 1997.
3. Letter, G. Sanders, RL, to M. Wilson, Ecology, "Invocation of Dispute on Hanford Federal Facility Agreement and Consent Order Change Control Form M-45-97-03," dated May 27, 1997.
4. Letter, T. Fitzsimmons, Ecology, to J. Wagoner, RL, "RE: Final Determination Pursuant to Hanford Federal Facility Agreement and Consent Order (Agreement) in the matter of the disapproval of the Department of Energy's change control form M-45-97-03," dated October 8, 1997.

**Risks and Enabling Assumptions for Completion of C-106 Sluicing  
by December 31, 1999**

- No major equipment failures occur.
- No leaks occur in either the pits or 241-C-106.
- No volatile organic compound emissions above the Notice of Construction limit of 500 ppm are encountered during the remainder of sluicing operations.
- Tank 241-AY-102 annulus ventilation system does not require further modifications to maintain the waste temperature within limits.
- Tank AY-102 does not retain flammable gas.



Tri-Party Agreement

## AGREEMENT IN PRINCIPLE

### Hanford Federal Facility Agreement and Consent Order (Agreement) Negotiation of Commitments for the 224-T Facility

#### Introduction:

The U.S. Department of Energy (DOE), Richland Operations Office (RL) and the Washington State Department of Ecology (Ecology), have held several discussions concerning the regulatory status and the most efficient path forward for DOE's 224-T Facility. Discussion has centered on a proposal, to which both Ecology and RL have tentatively agreed to manage 224-T Facility closure and decommissioning through the application of Agreement Section 8, "Facility Decommissioning Process," (in lieu of submittal of the currently scheduled Resource Conservation and Recovery Act (RCRA) closure plan, and management of 224-T fully under Agreement sections 6.0 and 7.0). This is proposed because the facility poses an apparent low risk to human health and the environment, and because closure requirements must be effectively integrated with other decommissioning activities.

The 224-T Facility consists of two contiguous entities. Transuranic Storage and Assay Facility (TRUSAF), which is a RCRA container storage unit, and the cell side which contains six nuclear process cells. The process cell side was last entered and the doors sealed in 1985. Accurate documentation of the current cell side state identifying what, if any, process chemicals, solutions, or wastes were left in the vessels, piping, or sumps is not sufficient. As a result, the regulatory standing of the 224-T cell side is uncertain.

During Fiscal Year 1999, RL will work to identify funding to characterize the process cell side of 224-T, and develop a safety characterization plan. DOE and Ecology also expect to establish initial Agreement milestones for 224-T Facility characterization, and activities that will subsequently allow the parties to determine the scope, and appropriate schedule for 224-T compliance and other decommissioning process activities.

Based on initial cell entry findings and consistent with site priorities, RL plans to complete characterization, analyze the data, and develop a preliminary plan of action in FY 2000. Upon completion of characterization and data analysis, a meeting will be conducted to discuss with Ecology what work should be undertaken in regards to the 224-T Facility Section 8 path forward.

In light of the proceeding, Ecology and DOE agree to the following:

Though 224-T is not being classified as a "key facility" under Agreement section 8.0, DOE and Ecology agree that necessary compliance (including closure), and other decommissioning requirements will be achieved through the application of Agreement section 8.0, instead of fully addressing 224-T through Agreement sections 6.0 and 7.0.

The Parties have entered into this AIP in order to establish the initial expectations and requirements for the closure and decommissioning of the 224-T Facility.

The parties also agree to the following:

1. That the current requirement for the submittal of a RCRA closure plan for the TRUSAF portion of the 224-T facility (due July 1, 1999) is hereby deleted. Applicable facility closure requirements will be established pursuant to Agreement section 8.0.
2. To enter into Phase I negotiations for the purpose of establishing Agreement commitments for the 224-T process cell characterization, entry/data collection and resulting data analysis. As part of these negotiations the Parties agree to establish a specific M-20-23 end date for completion of all characterization activities. After the process cell data is gathered, analyzed and reviewed by the Parties, Phase II negotiations will be scheduled and Agreement Section 8 Facility Decommissioning Process commitments and corresponding due dates will be established.
3. That Phase I negotiations shall commence on a date to be mutually agreed to by the parties (currently estimated for September 1999) and shall be completed no later than November 30, 1999. A weekly schedule of times and locations of negotiation sessions will be established by agreement between the Parties following the first negotiation session. The successful conclusion of negotiations shall be followed by an appropriate public comment period of not less than 45-days.
4. That Ecology, as the designated Lead Regulatory Agency for these negotiations, agrees to keep the U.S. Environmental Protection Agency (EPA) appropriately and currently informed regarding all pertinent aspects of the negotiations. DOE agrees to provide any reasonable assistance as requested to support Ecology in providing briefings or documentation to EPA. The Parties further agree to cooperate in providing periodic briefing opportunities to the State of Oregon, affected Indian Nations, the Hanford Advisory Board, and other stakeholders as appropriate.

5. That these negotiations shall stand in lieu of the dispute resolution processes established in the Agreement and that if the Parties are not able to resolve all issues in the negotiations, any unresolved matters, shall be referred for resolution under Article VIII for matters over which Ecology exercises final decision making authority and Article XVI for matters over which EPA exercises final decision making authority. Any dispute resulting from these negotiations shall be addressed beginning at the Inter Agency Management Integration Team level as described in the Agreement.

Approved this 22 day of June 1999

*James E. Rasmussen*  
James E. Rasmussen, Director  
U.S. Department of Energy  
Richland Operations Office

*Michael A. Wilson*  
Michael A. Wilson, Program Manager  
State of Washington  
Department of Ecology

*Douglas R. Sherwood*  
Douglas R. Sherwood, Project Manager  
U. S. Environmental Protection Agency