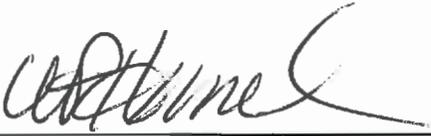


Inter-Agency Management Integration Team Meeting Minutes
November 21, 2019



SIGNATURES:

Approval:  Date: 6/3/2020
W.F. Hamel, DOE-RL IAMIT Representative

Approval: Robert G. Hastings Digitally signed by Robert G. Hastings
Date: 2020.06.02 14:02:35 -07'00' Date: _____
R.G. Hastings, DOE-ORP IAMIT Representative

Approval: Smith, Alex (ECY) Digitally signed by Smith, Alex (ECY)
Date: 2020.07.01 11:43:39 -07'00' Date: _____
A.K. Smith, Ecology IAMIT Representative

Approval: DAVID EINAN Digitally signed by DAVID EINAN
Date: 2020.07.01 16:20:31 -07'00' Date: _____
D.R. Einan, EPA IAMIT Representative

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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).

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 for Waste Management Area-C

Ecology stated they are ready to sign IAMIT Determinations for the Hazard Index (#2019-005) and the Judgmental Samples (#2019-006). MSA took the action to route for signatures. The remaining IAMIT Determination issues, Groundwater Ingestion and Food Chain Pathway, will be discussed further by the Parties.

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 OU Landfills”

Ecology requested a budget briefing from DOE on the Fiscal Year 2020 continuing resolution impacts in accordance with paragraph 149F of the Tri-Party Agreement (TPA). *See attachment: “Ecology requests for briefing on milestone impacts of FY 2020 Continuing Resolution”

DOE responded they are scheduling the Fiscal Year 2019 Year-End Accomplishment briefing for December 2, 2019, but will have to reschedule due to conflicts. DOE also reported they are going to schedule an Integrated Priorities List (IPL) briefing in the following weeks for Ecology and EPA. Ecology stated the difference between 149F and the IPL is that Ecology and EPA have the opportunity to provide recommendations on 149F. DOE agreed and stated their intent is to have recommendations on the IPL meeting as well. DOE requested that the IPL comments be captured in some formal format so the information can be provided to DOE-Headquarters. DOE took the action to schedule the meetings.

2.1.3 Possible Adoption of the Principles and Parameters in Regulatory Documents

DOE requested a commitment to set a date when the Parties can start initial discussions. DOE proposed a meeting to discuss the format and forum in which the discussion will be conducted. Ecology agreed with DOE’s approach.

2.1.4 Changes/Updates to TPA Paragraphs 148/149

DOE asked if the Parties agree paragraphs 148/149 need updating. DOE stated paragraphs 148/149 need to be updated to reflect the current federal budgeting process. EPA responded they agree 148/149 need to be updated because the intent is not currently being met. EPA further stated the updates need to be mindful of the federal budget process but also needs to meet the original intent of the 148/149 requirements pertaining to the meaningful sharing of information with enough detail and a real opportunity for EPA and Ecology to influence priorities. Ecology noted they are also committed to updating the paragraphs and suggested starting from scratch to draft changes to 148/149.

DOE reiterated they will not negotiate federal budgeting process, Office of Management and Budget (OMB) Circulars, and appropriations law. If all Parties understand the parameters, a meaningful level of information can be shared. EPA responded there is other information not part of the OMB Circulars that informs decisions that can be shared.

DOE proposed an Agreement in Principle (AIP) be used to set parameters (sharing of information and the ability to influence at the appropriate points) and have a small working group that would report back to the IAMIT. Ecology stated in addition to the AIP, they would prefer to draft a change control form in a room with a small team, to include the Parties' attorneys in attendance, to prevent sending redlined markups of the proposed changes back-and-forth between attorneys. DOE agreed with Ecology's proposal. MSA took the action to draft an AIP for changes to paragraphs 148/149 to be negotiated by March 31, 2020.

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

Ecology requested to close the action item for updating TPA appendices H and I as this is being discussed at other forums. DOE requested the action item remain on IAMIT agenda for tracking purposes only.

2.2 Status Updates

2.2.1 Tri-Party Agreement Five-Year Update (2017)

MSA proposed to close this action item and stated the items covered under the Five-Year Update are being tracked under other topics, with the exception of section 11.8 (ORP Critical Path Process). Ecology suggested section 11.8 could be discussed when they talk about paragraphs 148/149. The Parties agreed to close this action.

2.2.2 Modifications to Tri-Party Agreement Section 9.4, Administrative Record (AR) to Eliminate Hard Copy Requirements

Ecology stated they received a briefing on the process of updating the AR and are awaiting closure of further actions before approving the initiative to eliminate hard copy records from the AR. Ecology specified there are two separate items, one being the TPA database application which Ecology is extremely satisfied with, the other is the ability to pull documents out of the AR without notification to the TPA project managers. Ecology noted that this impedes the effort

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to eliminate hard copies to the AR and is waiting for procedures to be written by MSA, which explains how a document will be removed from the AR and whom has the authority to do so. Ecology referenced Section 4 of the TPA and stated this is not currently being followed.

DOE asked if Ecology's concern was once something is put into the AR, it could be removed without anybody knowing. Ecology responded that was the issue.

DOE asked who the lead with MSA is that is working on the issue. MSA responded that there are two groups currently working on the AR, they are Information Management and Sitewide Environmental Assurance. DOE requested MSA identify the lead on updating the AR procedure for removing items from the AR and the due date for completing the task.

Ecology stated they do not have a change control form to update section 9.4 but once actions are completed, Ecology is ready to sign. DOE responded that the action will eventually be MSA's to draft the change control form, but not at this time.

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

DOE asked Ecology if negotiations on updating TPA paragraphs 148/149 were a precursor to the budget issue. Ecology responded that the Representative Analogous Waste Site Coordinating Agency Liaisons (RASCAL) could be a possible solution for the milestones in this AIP.

EPA explained the RASCAL team's outputs would be potential milestone changes to aid in budget negotiations.

DOE suggested changing the description on the status update to reflect that the RASCAL team conclusions might provide a resolution to this issue.

Ecology stated that if the scope of milestone M-085-80 includes part of the PUREX plant, they will want this milestone discussed as part of the Fiscal Year 2020 presentation, as Ecology has an issue with DOE delaying that work indefinitely after some assertions were made regarding the PUREX tunnels. DOE stated they are familiar with the landscape regarding this issue, but may not necessarily agree with Ecology.

2.2.4 Milestone M-035-09K "Conduct biennial assessments of information and data access needs with EPA and Ecology"

Ecology stated they met with DOE on November 6, 2019 and presented a revised change control form for M-035-09K. DOE expressed concern that EPA was not present during the M-035-09K meeting and would like to have them as part of the discussion before the dispute is moved to a Director's Determination. Ecology responded that the dispute process is not set up to have both Ecology and EPA in one dispute. EPA stated that changes in the TPA criteria should have all Parties involved.

Ecology suggested a solution is to have DOE sign their version of the change control form or they can move to the Director's Determination. DOE responded they are agreeable to the concept, but does not agree with the changes to make a primary document.

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Ecology offered a follow on meeting with EPA to brief the status of the change control form. EPA responded they would be open to a meeting to discuss further.

Ecology stated if the Parties come to an agreement within two weeks, and sign a change control form, the dispute would be terminated. DOE responded that if it does go to the Director's Determination, DOE is ready to file an appeal.

DOE confirmed with Ecology, per Ecology's letter (19-NWP-092), that the dispute is whether or not milestone M-035-09K was met. Ecology responded that the letter says milestone M-035-09K was not met and DOE is noncompliant with TPA Sections 9.6.2 and 9.6.5. Ecology also stated that milestone M-035-09 says DOE will propose implementation schedules, which has not been done, so a Director's Determination will result in DOE getting implementation schedules, which is the draft milestone provided.

2.2.5 400 Area Fire Suppression/RCRA Permit Modification

MSA stated the Parties agreed to do a RCRA permit modification, which completes this action item. DOE and Ecology concurred with closing this item.

2.2.6 PCB Samples at the 200-DV-1 Operable Unit

DOE provided a presentation to the IAMIT for the "200-DV-1 Operable Unit Polychlorinated Biphenyl Results for Waste Sites 216-T-19 and 216-S-13" (see attachments for presentation).

DOE explained there was a sampling analysis plan (SAP) that stated aroclor analysis will be followed by congener analysis. However, the congener analysis was missed. DOE stated that Ecology wants DOE to go back and perform the congener analysis. Since then, DOE requested a data package. The data package was sent to DOE and forwarded to Ecology. DOE explained the discussion with Ecology would be of value if there were non-detects and to decide if there would be any value going back and testing. DOE noted the peer review methodology that takes the component fraction of the aroclors at the non-detects limit and translates it to the magnitude of less. DOE summarized that if there is a non-detect and the peer review methodology is used, then the limit is good. DOE asked EPA, as the enforcer of the SAP, what their opinion was.

Ecology followed by asking if the project managers have discussed this. EPA responded they have not spoken in depth on this subject and noted they would like to see how the 200-EA-1 samples help determine the process for 200-DV-1 but would like to discuss the timing further. EPA suggested this discussion happen at the project manager's level. EPA added that the expectations are to be procedurally compliant and there is a Conduct of Operations (CONOPS) discipline question in not following the SAP. DOE agreed that if the plan changes it will be reflected in the SAP and DOE is addressing the CONOPS issue.

DOE asked for confirmation that the IAMIT Determination states Ecology reserves the right to do split samples. EPA confirmed aroclor data would be available for review for comparison on positive PQL.

Ecology suggested moving discussions to the project manager level. The Parties agreed this issue will be discussed at the PM level and closed at the IAMIT level.

3.0 NEW IAMIT TOPIC

3.1 EPA Approval of Ecology-lead CERCLA OU Documents

DOE stated there are Ecology-lead Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Operable Units (OU) documents that are getting minimal EPA input, which is a concern. DOE's concern is that 42-USC-92-20G states that CERCLA authority is a non-delegable authority. DOE continued that 42-USC-92-20F section allows relevant state and local officials to participate in the planning and sections of the remedial actions. DOE clarified that the concern is there is a lot of ongoing work by the State (Ecology), that is not involving EPA.

Ecology responded their position is DOE requested in the early 1990s timeframe that the TPA be changed to a one-regulator approach, which was granted. Ecology continued that going back on the request would be inefficient. Ecology noted if EPA were the sole regulator for CERCLA, Ecology would do Resource Conservation and Recovery Act (RCRA) facility investigations/corrective measures study (RFI/CMS) separate from the remedial investigation/feasibility Study (RI/FS), which would be a mess. Ecology stated it is clear that EPA signs the SAP and approves the record of decision (ROD). EPA agreed with Ecology's opinion and stated staff limitations.

EPA suggested the information be shared between the attorneys so they can discuss further.

Ecology noted there was a corrective action settlement that resulted in Ecology accepting CERCLA programs. DOE responded that the settlement cannot supersede the law. Ecology noted they did not agree with DOE's interpretation. DOE suggested tracking this topic for an additional IAMIT meeting.

4.0 SPECIAL TOPIC

4.1 A Path Forward for Accelerating Cleanup Decision for Central Plateau Waste Sites

EPA provided a presentation on "A Path Forward for Accelerating Cleanup Decision for Central Plateau Waste Sites", aka the "RASCAL" team (see attachments for presentation).

EPA reported on the team assignment, actions taken, approach that has been drafted and its benefits. EPA is requesting agreement from the IAMIT to continue the RASCAL team's work.

EPA stated the team's focus is to formalize a consensus-based process in which those individuals with decision-making authority can agree on key decisions, ultimately expediting decision-making and minimizing rework. The team is made up of DOE, EPA and Ecology with additional support from contractors. EPA noted the assignment is to develop the initial framework and gain agreement from the IAMIT.

EPA stated the key components of conceptualized approach is to develop a Record of Decision (ROD) based on characterized representative waste sites, use Explanation of Significant Differences to incorporate "unconfirmed" waste sites, consider ROD amendment (if a completely different remedy is warranted), and identify and implement early response actions

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(either remedial or removal). Ecology added the team is still looking at representative analogous sites.

EPA reported the RASCAL team is primarily focused on identifying the conceptual site model (CSM) groups and associated waste sites. The identified scope includes the 200-BC-1, 200-EA-1 and 200-WA-1 OUs. Between these OUs there are 300 waste sites with existing SAPs that would consist of a lot of field characterization that would take years to complete. The RASCAL team would be able to characterize sites prior to the ROD, which would result in a time savings.

EPA stated the RASCAL approach is considering 13 CSM groups and eight (8) likely response actions. If the analogous sites are not confirmed in the future and need a different remedy, the team is proposing to have a range of alternative remedies that the public has a chance to review.

DOE noted that its use of the word “analogous” is in terms of the CSM, but that its table is a draft and would be subject to further change and modeling.

DOE asked the RASCAL team if the process could be segmented out and a stop point could be utilized. Ecology responded that it is possible, and that could be in the implementation schedule.

EPA stated the next steps for the RASCAL team would consist of:

- Identifying sites for early response actions, complete framework,
- Identifying necessary modifications to 200-EA-1/WA-1/BC-1 RI/FS work plans (including timeline),
- Discussing and proposing implementation milestones, and
- Documenting in IAMIT Determination in March.

EPA noted there is a problem with DOE not having enough Remove-Treat-Dispose (RTD) project locations that generate contaminated soil to mix with Deactivation, Decommissioning, Decontamination, and Demolition (D4) project debris, which would result in using clean fill and expand Environmental Restoration Disposal Facility unnecessarily. DOE responded there are 200-PW-1, -2, -3 and -4 Z ditches with about 400,000 cubic meters of material that work starts in FY 2021. Ecology and EPA both requested a timeline in the work plans to see if D4 debris and soil decisions align. DOE noted the IPL meeting should answer the Parties’ questions.

The RASCAL team asked the IAMIT to agree to proceed with their proposed next steps. The IAMIT agreed.

5.0 UPCOMING TOPICS/ACTION ITEMS FOR FUTURE IAMIT MEETINGS

MSA will route the latest versions of the Baseline Risk Assessment for Waste Management Area-C IAMIT Determinations for Hazard Index and Judgmental Samples for IAMIT signatures.

DOE took the action to schedule the Fiscal Year 2019 Year-End Accomplishment briefing and the Fiscal Year 2020 Continuing Resolution Impacts and Integrated Priorities List (IPL) meetings.

MSA took the action to draft TPA Paragraph 148/149 AIP for the Parties’ review.

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IAMIT requested to carry the principles and parameters discussion to the next IAMIT meeting to discuss the possibility of a working group and determine the process and path forward.

DOE requested MSA identify the lead on updating the AR procedure for removing items from the AR and the due date for completing the task.

Meeting was scheduled for Monday, November 25, 2019 for the Parties to brief EPA on the M-035-09K dispute.

DOE requested to carry the EPA Approval of Ecology-lead CERCLA OU Documents topic to the next IAMIT meeting for discussion.

The next IAMIT meeting is scheduled for December 19, 2019.



**Inter-Agency Management Integration Team Meeting
 Thursday November 21, 2019, 8-9 a.m.***

Department of Ecology, 3100 Port of Benton Blvd, Conference Rooms 3A/B, Richland, WA

Agenda

No	Time	POC / Org	Topic
1	8:00 – 8:02 a.m.	Michael Turner, MSA	Welcome and Meeting Logistics/Format
2	8:02 – 8:20 a.m.	Michael Turner, MSA IAMIT and attendees	Review IAMIT Action Tracking Table
3	8:20 – 8:30 a.m.	Mike Cline, DOE-RL IAMIT Members	New IAMIT Topic - EPA Approval of ECY-lead CERCLA OU Documents
4	8:30 – 8:55 a.m.	- Craig Cameron, EPA (lead) - Nina Menard, Kim Welsch, ECY - Doug Hildebrand, John Neath, DOE	Special Topic: A Path Forward for Accelerating Cleanup Decisions for Central Plateau Waste Sites
5	8:55– 8:59 a.m.	Michael Turner, MSA IAMIT members	Upcoming Topics/Action Items for Future IAMIT Meetings - Agreement on 2020 IAMIT schedule
6	8:59– 9:00 a.m.	Michael Turner, MSA IAMIT members	Review of Today’s Actions

***Note: There is a “core” IAMIT meeting immediately following (WMA-C
 Baseline Risk Assessment Remaining Issues)**

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Table I. Action Items¹

1. Baseline Risk Assessment for WMA-C

Reference: Phase II RCRA Facility Investigation for Waste Management Area C (RPP-RPT-58339)

Affected Milestone: 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 Baseline Risk Assessment: Judgmental Samples; Hazards Index; Groundwater Ingestion and Food Chain Pathway

Comments: Presentations were given by Ecology and DOE at the 02/21/19 IAMIT. At that meeting, Ecology requested more time to consider the issue. There was no change in status at the 3/21/19 IAMIT. The IAMIT met on 05/08/19 to attempt resolution on 4 issues. Two of four (Judgmental Samples and Hazard Index) were resolved and IAMIT Determinations have been drafted and are with the IAMIT for review. The two remaining issues (Groundwater Ingestion and Food Chain Pathway) are being discussed internally by Ecology and await resolution. There were other broader issues discussed regarding future land use and the possible formal adoption of the Inner Areas Principles to apply to tank farm cleanup that are up for future discussion by the IAMIT. IAMIT is still tasked with resolving the remaining two issues (Groundwater Ingestion and Food Chain Pathway). The parties must also determine whether the Baseline Risk Assessment is a TPA Primary or Secondary Document. At the 07/18/19 IAMIT, the parties agreed to a "core" IAMIT meeting to discuss the Groundwater Ingestion and Food Chain Pathway further. MSA took the action to schedule the meeting. Parties have yet to agree to a date. Ecology noted their staff was reviewing the Judgmental Samples and Hazard Index IAMIT Determinations. At the 08/15/19 IAMIT, Ecology stated that they were still reviewing the draft IAMIT Determinations for Judgmental Samples and Hazard Indices. *At the 10/17/19 IAMIT, Ecology committed to reviewing the language in the Hazard Index IAMIT Determination (#2019-005) and Judgmental Samples IAMIT Determination (#2019-006) for the BRA WMA-C by the November 2019 IAMIT meeting. Ecology also committed to scheduling an internal meeting with Ecology staff to discuss the two remaining issues (Groundwater Ingestion and Food Chain Pathway) and then talk about the outcome with the November IAMIT. A "stand-alone" IAMIT meeting to discuss the Groundwater Ingestion and Food Chain Pathway issues is scheduled for 11/21/19.*

Closed: —

¹ *New information shown in blue.

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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”

Reference: Letter: 18-NWP-096; Statement of Dispute: AR-01073 (letter 19-SGD-0008)

Affected Milestone: M-015-93C

Originated: Dispute initiated at the Project Manager level 7/09/18. Elevated to the IAMIT level on 03/14/19.

Status: Open

Dispute Extended: The Parties had until 04/30/19 to resolve dispute at the IAMIT level (latest extension signed on 04/04/19). On 05/16/19, the Parties agreed not to issue the Director’s Determination extension and work resolution via the budget AIP and TA.

Action: Parties are being asked to resolve dispute at the IAMIT level or send to Ecology Director for Director’s Determination.

Comments: At the 4/24/19 IAMIT meeting, Ecology noted that the TPA-prescribed due date for a Final (Director’s) Determination may have lapsed and proposed extending the dispute at the IAMIT level. DOE took the action to set up a meeting to discuss Federal Fiscal Years 2018, 2019 budgets. DOE-RL stated that this milestone is now different from the other milestones in the Agreement in Principle (AIP) and Tentative Agreement (TA) and needs to be addressed separately (Ecology elevated it from the PM level to the IAMIT level). On 05/16/19, the Parties agreed not to issue the Director’s Determination extension and work resolution via the budget AIP and TA. A draft AIP and TA which includes M-015-93C, is in review by the Parties. If signed, the AIP and TA including M-015-93C would resolve this dispute. On 07/03/19 Ecology noted it would not sign the AIP until it received a response to its letter of 07/10/19 (19-NWP-109). At the 08/15/19 IAMIT meeting, Ecology stated that the AIP remains on hold until it gets a reply to its 07/10/19 letter. DOE said it was still coordinating its response with DOE Headquarters. EPA also requested to see the DOE response when issued. On 09/09/19, DOE-RL requested Ecology’s reconsideration in approving the AIP to begin negotiating the milestones impacted by the FFY 2018 and 2019 budget via letter 19-AMRP-0074. *At the 10/17/19 IAMIT, there was no change in status.*

Closed: —

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3. Possible Adoption of the Principles and Parameters in Regulatory Documents

Reference: DOE/RL-2004-60, REV.1

Affected Milestone: N/A

Originated: 05/16/19

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to consider adopting the Principles and Parameters for use as a standard in producing regulatory documents.

Comments: IAMIT has agreed to discuss this topic as a "core" IAMIT meeting. No meeting date set. On 6/20/19, Ecology stated they needed to discuss this internally and discuss and would report status at the 07/18/19 IAMIT meeting. At the 07/18/19 IAMIT meeting the parties agreed to refer to this topic as the "Principles and Parameters" and the parties agreed to add this topic to a future regularly scheduled IAMIT meeting to discuss further. At the 08/15/19 IAMIT meeting, the parties agreed to address this issue in a stand-alone, topic-specific IAMIT meeting. MSA took the action to schedule that meeting. Parties have yet to agree on a date for this meeting. [At the 10/17/19 IAMIT, the agreed to discuss this subject and path forward at the November IAMIT.](#) The parties also discussed the possibility of assembling a small group to evaluate the principles and parameters and then bring a recommendation back to the IAMIT.

Closed: —

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4. Changes/Updates to TPA Paragraphs 148/149

Reference: Tri-Party Agreement Legal Agreement, paragraphs 148, 149

Affected Milestone: N/A

Originated: 05/16/19

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to revise and update TPA paragraphs 148/149 (see also "Status Updates, item #1 below).

Comments: IAMIT has agreed to discuss this update and potentially change the TPA Legal Agreement. The parties have been discussing potential changes for a number of years. History and background have been provided. IAMIT is being asked to meet as a "core" team to discuss changes and eventually recommend to the Executive Managers signing a TPA Change Control Form to document those changes. Meeting was held on 06/27/19, with the parties' subject matter experts and legal teams to discuss the history and rationale for proposed changes. DOE is reviewing paragraphs 148/149 to look at simplifying the proposed changes and will provide to regulators for review. At the 07/18/19 IAMIT, the parties agreed that a kick-off meeting should be scheduled to sign the AIP and start negotiations. At the 08/15/19 IAMIT meeting, MSA agreed to work with DOE to schedule a kick-off meeting. Parties have yet to agree to a date for the meeting. On 09/09/19, DOE-RL provided to Ecology via letter 19-AMRP-0074, a timeline of efforts made to update the language in 148 and 149 and offered to schedule joint meetings to accomplish this task. [At the 10/17/19 IAMIT, DOE noted they would not take further action at this time without further discussion and buy in from the parties to perform a meaningful exercise to revise paragraphs 148 and 149. DOE stated they are committed to following federal law and the TPA and will continue to do so whether these paragraphs are revised or not.](#)

Closed: —

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

Reference: Tri-Party Agreement Action Plan, Appendices H and I

Affected Milestone: M-042-00 and M-045-00 series

Originated: 05/16/19

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to review the draft TPA Agreement in Principle for entering into formal negotiations to revise and update TPA Appendices H and I.

Comments: The parties agree that TPA appendices H and I are outdated and in need of change. Though attempts have been made and proposals for changing have been shared by the parties, no change has occurred. In light of the current 241-C-106 Waiver Request Denial Dispute, the parties are agreeing to enter formal TPA negotiations. At the 6/20/19 IAMIT, the Parties agreed to schedule a kick-off meeting and share the draft AIP, meeting has yet to be scheduled. At the 07/18/19 IAMIT, the parties agreed that an AIP was necessary to enter into negotiations for updates to Appendices H & I in a two-phased approach, first being the easy updates and then proceed to the more challenging updates. The parties also agreed to add TPA section 11.8 (ORP Critical Path) as part of these negotiations. At the 08/15/19 IAMIT, MSA took the action to revise the draft Appendix H, I AIP to include TPA section 11.8. Ecology noted that the TPA dispute over retrieval criteria for SST 241-C-106, currently before the Washington State Pollution Control Hearings Board could delay discussions. [At the 10/17/19 IAMIT, the parties agreed revisions to Appendices H and I should be placed on hold pending the path forward determined from the Hanford tank waste mission "holistic" discussions.](#)

Closed: —

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Table II. Status Updates

1. Tri-Party Agreement Five-Year Update (2017)

Reference: TPA Article XXXVIII

Affected Milestone: C-008-05 (completed on 3/6/17 via IAMIT Determination 2017-001)

Originated: N/A

Status: Open

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 08/18/17 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. A decision to reprint must be made by July 31st to complete by the end of the fiscal year. At the 10/18/18 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 12/20/18 IAMIT meeting, Ecology stated they have been discussing minor changes to Appendix I with ORP.

At the 01/31/19 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 03/21/19 IAMIT, the Parties were asked for an update on proposed changes to TPA Paragraphs 148/149. There was no change in status. At the 04/24/19 IAMIT meeting, EPA stated they are still working on providing comments on TPA paragraphs 148/149 and indicated they would like to be doing the same things that are in the TPA, just update them to reflect current terminology. At the 05/16/19 IAMIT, IAMIT agreed to revisit the history of the proposed changes and devote subject matter experts and/or legal staff to work on changes. At the 6/20/19, the Parties agreed to wait on making a reprint decision and there are still significant updates to the TPA being worked. At the 7/18/19 IAMIT, Ecology noted minor cleanup is needed in Section 11.8 and to address it with the AIP for updating Appendices H and I. At the 10/17/19 IAMIT, DOE asked if this action should be kept open or closed, as the actions regarding updates to Section 11.8, Appendix H and I and Paragraphs 148 and 149, now have their own actions and discussions as part of the IAMIT. Parties are being asked to close

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this action and address any remaining aspects in the next TPA Five-Year Review, scheduled to be completed by 6/30/2022.

Closed: ---

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

Reference: TPA Section 9.4

Affected Milestone: N/A

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

Status: Open - Change Control Form P-09-18-01 has been drafted, is under review.

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. MSA is working with the TPA Agencies on a transition plan with the goal of launching the new, upgraded site during the last week of June. On 06/27/19, the upgraded Hanford Administrative Record was officially launched. Ecology has initially provided positive feedback. At the 07/18/19 IAMIT meeting, Ecology stated they wanted a "validation and verification" meeting to assess the Administrative Record upgrades. On 8/28/19, a validation meeting was held. Action is with Ecology to propose a new TPA Change Control Form or make changes to the existing (P-09-18-01). On 9/03/19, Ecology stated they would like DOE to prepare AR indexes at regular intervals and will draft a CCF with proposed language to modify Section 9 of the TPA and provide to DOE/EPA for review. Ecology also requested additional functionality in the AR for replicating the RCRA Permit at any given point in time. At the 10/17/19 IAMIT, it was noted the action is currently with Ecology to draft the change control form with the proposed modifications to Section 9 of the TPA, to include the Administrative Record indices Ecology has requested from DOE.

Closed: —

Inter-Agency Management Integration Team Decision Table/Action Tracking

November 21, 2019

3. 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 Milestone: M-015-84, M-015-91B, M-015-92C, M-015-93B, M-015-93C, M-015-98, M-015-99, M-015-112, M-016-255, M-016-256, M-085-70 (currently in dispute at the PM level), M-085-80

Originated: 12/20/18

Status: Open - Agreement in Principle (AIP) and corresponding Tentative Agreement (TA) 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 12/20/18 IAMIT meeting, Ecology stated they had received drafts of the AIP and TA on 12/19/18, were scheduled to meet with their attorneys to review them, and will respond back to DOE. At the 01/31/19 IAMIT, Ecology stated EPA had been on furlough and needed to restart these discussions. At the 2/21/19 IAMIT, the Parties were asked for an update on status. There was no change in status. At the 3/21/19 IAMIT, Ecology stated that both Ecology and EPA were discussing the language in the AIP and TA and will send to DOE. Action is with Ecology and EPA to provide comments. Ecology questioned the language in the AIP/TA and sent it to EPA for their review. At the 04/24/19 IAMIT, DOE-RL took the action to schedule a teleconference between the Tri-Parties to discuss current status and path forward to negotiations. (See also item above regarding M-015-93C.) On 05/06/19, DOE received the AIP from EPA and is currently reviewing it for approval. At the 06/20/19 IAMIT, the parties discussed expectations for the AIP. Ecology stated there is a letter going to DOE regarding budget that was currently in review with Ecology legal. On 07/03/19 Ecology noted it would not sign AIP until it received a response to its letter of 07/10/19 (19-NWP-109). DOE requested an extension to 08/02/19 to respond to the letter. At the 08/15/19 IAMIT meeting, Ecology stated that the AIP remains on hold until it gets a reply to its 07/10/19 letter. DOE said it was still coordinating its response with DOE Headquarters. EPA also requested to see the DOE response when issued. As of 09/09/19, DOE-RL requested Ecology's reconsideration of approving the AIP to begin negotiating the milestones impacted by the FFY 2018 and 2019 budget via letter 19-AMRP-0074. [At the 10/17/19 IAMIT Ecology stated they wanted to resolve the issues with TPA Paragraphs 148/149 before signing an AIP. DOE disagreed, saying the issues were separate.](#)

Closed: —

Inter-Agency Management Integration Team Decision Table/Action Tracking
November 21, 2019

4. Milestone M-035-09K “Conduct biennial assessments of information and data access needs with EPA and Ecology”

Reference: 19-NWP-050, 19-AMRP-0059

Affected Milestone: M-035-09K (potentially)

Originated: 04/24/19

Status: Dispute Resolution

Dispute Extended: N/A

Action: Status only

Comments: On 03/15/19, Ecology sent DOE letter 19-NWP-050, stating that it believed M-035-09K was in jeopardy of being missed, and that it had determined that DOE was non-compliant with TPA sections 9.6.2 and 9.6.5. In the same letter, Ecology stated that DOE must grant Ecology access to “all data and databases that are relevant to work performed or to be performed under the TPA by March 31, 2019” or face potential penalties of \$5,000 for the first week and \$10,000 per week, per violation thereafter. On 03/29/19, DOE sent Ecology letter 19-AMRP-0059, stating that it had completed a full assessment of the data access needs spelled out in milestone M-035-09K, and thereby had met the milestone. At the 04/24/19 IAMIT, Ecology stated they could see a potential dispute for this milestone and requested a meeting be scheduled prior to the next regularly scheduled IAMIT on 05/16/19, to see if their issue can be resolved. This meeting was held 05/07/19, with no resolution. On 05/28/19, the Parties met and discussed a potential path forward. Ecology reiterated its electronic data access needs are currently not being met. DOE committed to work with its contractors to “flag/tag” a preliminary subset of TPA related document categories as “TPA Related” in IDMS. This conceptual method will be used to grant Ecology access within IDMS to said document categories. All parties agreed Ecology will provide an initial list of document types for the contractors to begin tagging, this is not an all-inclusive list, just a starting point to test this conceptual method. Additional workflow and technical solutions may be needed to ensure compliance with sections 9.6.2 and 9.6.5 of the TPA action plan, Ecology and DOE have agreed to this pilot project in good faith. At the 6/20/19 IAMIT, Ecology indicated they want milestone M-035-09K replaced in the TPA. DOE declined and stated they are willing to go to dispute. On 07/01/19, DOE informed Ecology it would be providing three replacement milestones for M-035-09K. At the 7/18/19 IAMIT, the parties agreed to meet and agree to “easy list” and discuss schedules. On 08/10/19, DOE initiated the TPA dispute resolution process. On 09/19/19, the dispute was elevated to the IAMIT by DOE, with an accompanying Statement of Dispute (letter 19-AMRP-0081). [Dispute is extended at the IAMIT level until 11/21/19 \(to coincide with the IAMIT meeting\).](#)

Closed: —

Inter-Agency Management Integration Team Decision Table/Action Tracking

November 21, 2019

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

Reference: TPA Section 9.4

Affected Milestone: N/A

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

Status: Open - Change Control Form P-09-18-01 has been drafted, is under review.

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. MSA is working with the TPA Agencies on a transition plan with the goal of launching the new, upgraded site during the last week of June. On 06/27/19, the upgraded Hanford Administrative Record was officially launched. Ecology has initially provided positive feedback. At the 07/18/19 IAMIT meeting, Ecology stated they wanted a "validation and verification" meeting to assess the Administrative Record upgrades. On 8/28/19, a validation meeting was held. Action is with Ecology to propose a new TPA Change Control Form or make changes to the existing (P-09-18-01). On 9/03/19, Ecology stated they would like DOE to prepare AR indexes at regular intervals and will draft a CCF with proposed language to modify Section 9 of the TPA and provide to DOE/EPA for review. Ecology also requested additional functionality in the AR for replicating the RCRA Permit at any given point in time. *At the 10/17/19 IAMIT, it was noted this action is currently with Ecology to draft the change control form with the proposed modifications to Section 9 of the TPA, to include the Administrative Record indices Ecology has requested from DOE.*

Closed: —

Inter-Agency Management Integration Team Decision Table/Action Tracking

November 21, 2019

6. 400 Area Fire Suppression/RCRA Permit Modification

Reference: N/A

Affected Milestone: N/A

Originated: 08/15/19 IAMIT

Status: Open -

Dispute Extended: N/A

Action: Approve RCRA Permit Modification

Comments: Parties are being asked to approve a Class 2 RCRA Permit modification to remove the FFTF/400 Area Fire Suppression System, which would allow decommissioning of the system. Options were offered for alternate fire detection/suppression systems in lieu of existing system. DOE-RL presented to the IAMIT on 10/17/19. The Parties have tentatively agreed option four, to install a pressure-indicating transmitter on the argon line near the argon type tanks with a signal sent out to either the Hanford Fire Department or Hanford Patrol, or the Central Control Office, was the most viable option.

Closed: —

7. PCB Samples at the 200-DV-1 Operable Unit

Reference: N/A

Affected Milestone: N/A

Originated: 10/17/19 IAMIT

Status: Open -

Dispute Extended: N/A

Action: Potential Approval of Updated Sampling and Analysis Plan for 200-DV-1 OU

Comments: Parties are being asked to approve a potential revision to the 200-DV-1 SAP based on IAMIT Determination #2019-003, approved June 20, 2019. This IAMIT determination was an agreement for the 200-EA-1 OU, which allows DOE to perform EPA Method 8082 on shallow-zone samples to evaluate risk to human health and the environment, and to perform EPA Method 1668 on any of the samples where there is a Method 8082 detect above the practical quantitation limit (PQL). At the 10/17/19 IAMIT, DOE took the action to assemble a data package to support the discussion of PCB Samples at the 200-DV-1 OU during the next IAMIT meeting in November. This data package will include: 1) the delta between the sampling performed and the sampling required, and 2) the forms from the analytical data packages.

Closed: —

Table III. Recently Closed/Other Agreements

NONE

200-DV-1 Operable Unit Polychlorinated Biphenyl Results for Waste Sites 216-T-19 and 216-S-13



IAMIT Meeting: November 21, 2019



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200-DV-1 OU PCB/Congeners

- Two waste sites in 200-DV-1 OU were identified for PCB analysis (216-T-19 and 216-S-13)
- PCB congener analysis identified in Table 2-2, footnote O, of the 200-DV-1 Sampling and Analysis Plan (DOE/RL-2011-104)
 - *“Aroclors (total PCBs) will be evaluated initially using EPA Method 8020. If Aroclors are not detected, then additional analyses will be conducted using EPA Method 1668a...”*
- PCBs were not detected in either site
 - Method Detection Limit for 216-T-19 site is high, ranging from 290U to 430U $\mu\text{g}/\text{kg}$
 - Method Detection Limit for 216-S-13 site is normal, ranging from 8.6U to 10U $\mu\text{g}/\text{kg}$



200-DV-1 Sampling and Analysis Plan (DOE/RL-2011-104) – Containments of Potential Concern (COPC) Waste Sites

DOE/RL-2011-104, REV. 0

Table 1-2. COPC for 200-DV-1 OU Waste Sites

Radiological Constituents			
Americium-241	Europium-154	Plutonium-238	Technetium-99
Carbon-14	Europium-155	Plutonium-239/240	Thorium-232
Cesium-137	Hydrogen-3 (Tritium)	Radium-226	Uranium-234 ^d
Cobalt-60	Neptunium-237	Radium-228	Uranium-235
Europium-152	Nickel-63	Strontium-90	Uranium-238
Iodine-129 ^{a,e}			Uranium-233 ^{a,b}
Inorganic Constituents			
Cadmium	Lead	Ammonia/Ammonium	Nitrate/Nitrite
Chromium	Mercury	Chloride	Phosphate
Chromium(VI)	Nickel	Cyanide	Sulfate
Copper	Silver	Fluoride	Aluminum ^h
Antimony ^b	Manganese ^b	Selenium ^b	Uranium (total) ^b
Arsenic ^{c,e}	Barium ^a		
Organic Constituents (BY Cribs, 216-B-42, 216-T-18, 216-T-19, 216-S-9, 216-S-13, 216-S-21 waste sites only) ^f			
Tributyl phosphate ^g	Normal paraffin hydrocarbon (kerosene) ^g		
Organic Constituents (216-T-19 waste site only) ^g			
1,1-Dichloroethane	1,2-Dichloroethane	cis-1,2-Dichloroethylene	trans-1,2-Dichloroethylene
1,1,1-Trichloroethane	Acetone	Benzene	n-Butyl Benzene
Carbon tetrachloride	Chlorobenzene	Trichloromethane (Chloroform)	Dichloromethane (Methylene Chloride)
Ethyl benzene	Methyl Ethyl Ketone	Methyl Isobutyl Ketone (Hexone)	Phenol
Polychlorinated biphenyls	Tetrachloroethylene	Toluene	Trichloroethylene
Xylene			
Organic Constituents (216-S-13 waste site only) ^g			
Methyl Isobutyl Ketone (Hexone)	Polychlorinated biphenyls		

- a. Not identified for the 200-TW-1 or 200-TW-2 OUs, but included on waste-site specific basis for the 200-DV-1 OU.
- b. Identified as a contaminant of concern in Table 2 of DOE/RL-2004-10, *Proposed Plan for the 200-TW-1 Scavenged Waste Group, the 200-TW-2 Tank Waste Group, and the 200-PW-3 Fission-Product Rich Waste Group Operable Units*.
- c. Analyzed as total petroleum hydrocarbons (asosene).
- d. Identified as a COPC for 216-T-19 waste site only, in accordance with DOE/RL-2007-02-VOLII-ADD3, *Site-Specific Final Sampling Plans for the 216-B-42 Trench, 216-S-13 Crib, 216-S-21 Crib, 216-T-18 Crib and 216-T-19 Crib and The Field in the 200-TW-1/200-PW-3 Operable Units*, AD3-6.0.
- e. Included for previous 200-PW-3 OU waste sites only (216-S-13), in accordance with DOE/RL-2007-02-VOLII-ADD3, AD3-3.0.
- f. Included for previous 200-TW-1/200-PW-5 OU and 200-PW-1 OU waste sites only (216-B-42, BY Cribs, 216-T-18, 216-T-19, 216-S-9, 216-S-13, 216-S-21), in accordance with DOE/RL-2007-02, *Supplemental Remedial Investigation Feasibility Study Work Plan for the 200 Areas Central Plateau Operable Units: Volume I: Work Plan and Appendices*.
- g. Analyzed as tributyl phosphate only.
- h. Analyzed as U-233/234 by uranium isotopic alpha energy analysis.
- COPC = contaminant of potential concern
- OU = operable unit



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200-DV-1 Sampling and Analysis Plan (DOE/RL-2011-104) – Analytical Performance Requirements

DOE/RL-2011-104, REV. 0

Table 2-2. Analytical Performance Requirements for Nonradionuclides

COPC	Chemical Abstracts Service No.	Preliminary Action Level ^f (mg/kg)				Hanford Site Background ^g	Name/ Analytical Technology ^h	Required Detection Limits (mg/kg) ⁱ		Soil ^k (%)		Water ^l (%)	
		Direct Contact, WAC 173-340 ^e (mg/kg)		Groundwater Protection ^f	Ecological Indicator Concentration (mg/kg) ^d			Water (mg/L)	Soil (mg/kg)	Precision	Accuracy	Precision	Accuracy
		Method C Industrial	Method B Unrestricted										
Nonradioactive Metals													
Aluminum	7429-80-5	3,500,000	80,000	1,500	50	11,800	EPA Method 6020 or EPA Method 200.8	0.02	0.2	≤30	70-130	≤20	80-120
Arsenic	7440-38-2	87.5	0.67	0.034	7	6.47	EPA Method 6010 ICP Trace or EPA Method 6020 or EPA Method 200.8	0.02	2	≤30	70-130	≤20	80-120
Antimony	7440-36-0	1,400	32	5.4	—	5 ^m	EPA Method 6010 ICP Trace or EPA Method 6020 or EPA Method 200.8	0.006	0.6	≤30	70-130	≤20	80-120
Barium	7440-39-3	700,000	16,000	1,650	102	132	EPA Method 6010 ICP Trace or EPA Method 6020	0.005	0.5	≤30	70-130	≤20	80-120
Cadmium	7440-43-9	3,500	80	0.69	4	—	EPA Method 6010 ICP Trace or EPA Method 6020 or EPA Method 200.8	0.002	0.5	≤30	70-130	≤20	80-120
Chromium (total)	7440-47-3	Unlimited	120,000	2,000	42	18.5	EPA Method 6010 ICP Trace or EPA Method 6020 or EPA Method 200.8	0.002	0.2	≤30	70-130	≤20	80-120
Chromium (VI)	18540-29-9	10,500	240	0.2	—	—	EPA Method 7196 – colorimetric	0.01	0.5	≤30	70-130	≤20	80-120
Copper	7440-50-8	130,000	2,960	265	50	22	EPA Method 6010 ICP Trace or EPA Method 6020 or EPA Method 200.8	0.01	1	≤30	70-130	≤20	80-120
Lead	7439-92-1	1,000 ⁿ	250 ^o	270	50	10.2	EPA Method 6010 ICP Trace or EPA Method 6020 or EPA Method 200.8	0.005	0.5	≤30	70-130	≤20	80-120
Manganese	7439-96-5	490,000	11,200	65	1,100	512	EPA Method 6010 ICP or EPA Method 6020 or EPA Method 200.8	0.005	5	≤30	70-130	≤20	80-120
Mercury	7439-97-6	1,050	24	2.09	0.1	0.33	EPA Method 7470 (water) or EPA Method 200.8	0.0005	N/A	≤30	70-130	≤20	80-120
							EPA Method 7471 (soil) or EPA Method 200.8	N/A	0.2	≤30	70-130	≤20	80-120
Nickel	7440-02-0	70,000	1,600	130	30	19.1	EPA Method 6010 ICP or EPA Method 6020 or EPA Method 200.8	0.04	4	≤30	70-130	≤20	80-120
Selenium	7782-49-2	17,500	400	5.2	0.3	0.78 ^m	EPA Method 6010 ICP or EPA Method 6020 or EPA Method 200.8	0.01	1	≤30	70-130	≤20	80-120
Silver	7440-22-4	17,500	400	13.6	2	0.73	EPA Method 6010 ICP or EPA Method 6020 or EPA Method 200.8	0.002	0.2	≤30	70-130	≤20	80-120



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200-DV-1 Sampling and Analysis Plan (DOE/RL-2011-104) – Analytical Performance Requirements Continued

DOE/RL-2011-104, REV. 0

Table 2.2. Analytical Performance Requirements for Nonradionuclides

COPC	Chemical Abstracts Service No.	Preliminary Action Level ^a (mg/kg)				Hanford Site Background ^a	Name/ Analytical Technology ^b	Required Detection Limits (mg/kg) ^c		Soil ^d (%)		Water ^e (%)	
		Direct Contact, WAC 173-340 ^b (mg/kg)		Groundwater Protection ^a	Ecological Indicator Concentration (mg/kg) ^d			Water (mg/L)	Soil (mg/kg)	Precision	Accuracy	Precision	Accuracy
		Method C Industrial	Method B Unrestricted										
Uranium (total)	7440-61-1	10,500	240	1.32	5	3.21	U total – kinetic phosphorescence analysis or EPA Method 200.8 or EPA Method 6020	0.001	1	≤30	70-130	≤20	80-120
Inorganics													
pH (corrosivity)	pH	–	–	–	–	–	EPA Method 9045 or SM4500 PH or EPA Method 150.1 or EPA Method 9040	0.1 pH unit	0.1 pH unit	≤30	70-130	≤20	80-120
Ammonia/ammonium	7664-41-7	–	–	–	–	28	EPA Method 350.1 ^f or EPA Method 300.7	0.05	0.5	≤30	70-130	≤20	80-120
Chloride	16887-00-6	–	–	1,000	–	100	EPA Method 300.0	0.2	2	≤30	70-130	≤20	80-120
Cyanide	57-12-5	70,000	1,600	0.80	–	–	EPA Method 9010 or EPA Method 9014 or SM4500E CN	0.005	0.5	≤30	70-130	≤20	80-120
Fluoride	16984-48-8	210,000	4,800	24.1	–	200 (as fluorine)	EPA Method 300.0 ^g – IC	0.5	5	≤30	70-130	≤20	80-120
Nitrate	14797-55-8	Unlimited	128,000	40	–	52	EPA Method 300.0 ^h – IC	0.25	2.5	≤30	70-130	≤20	80-120
Nitrite	14797-65-0	350,000	8,000	4	–	–	EPA Method 300.0 ^h – IC	0.25	2.5	≤30	70-130	≤20	80-120
Phosphate	14265-44-2	N/A	N/A	–	–	0.79	EPA Method 300.0 ^h – IC	0.5	5	≤30	70-130	≤20	80-120
Sulfate	14806-79-8	N/A	N/A	1,030	–	237	EPA Method 300.0 ^h – IC	0.5	5	≤30	70-130	≤20	80-120
Organics													
Acetone	67-64-1	Unlimited	72,000	28.9	–	–	EPA Method 8260 – GC/MS	0.02	0.02	≤30	(q)	≤20	(q)
Benzene	71-43-2	2,390	18.2	0.00483	–	–	EPA Method 8260 – GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
n-Butyl Benzene	104-51-8	140,000	3,200	110	–	–	EPA Method 8260 – GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
Carbon Tetrachloride	56-23-5	1,010	7.69	0.031	–	–	EPA Method 8260 – GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
Chlorobenzene	108-90-7	70,000	1,600	0.874	40	–	EPA Method 8260 – GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
Chloroform (trichloromethane)	67-66-3	21,500	164	0.0381	–	–	EPA Method 8260 – GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
1,1-Dichloroethane	75-34-3	350,000	8,000	4.37	–	–	EPA Method 8260 – GC/MS	0.01	0.01	≤30	(q)	≤20	(q)
1,2-Dichloroethane	107-06-2	1,440	11	0.00232 below RDL ^a	–	–	EPA Method 8260 – GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
trans-1,2-Dichloroethylene	156-60-5	70,000	1,600	0.543	–	–	EPA Method 8260 – GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
cis-1,2-Dichloroethylene	156-59-1	35,000	800	0.35	–	–	EPA Method 8260 – GC/MS	0.005	0.005	≤30	(q)	≤20	(q)



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200-DV-1 Sampling and Analysis Plan (DOE/RL-2011-104) – Analytical Performance Requirements Continued

DOE/RL-2011-104, REV. 0

Table 2-2. Analytical Performance Requirements for Nonradionuclides

COPC	Chemical Abstracts Service No.	Preliminary Action Level ^a (mg/kg)				Hanford Site Background ^f	Name/ Analytical Technology ^g	Required Detection Limits (mg/kg) ^h		Soil ⁱ (%)		Water ^j (%)	
		Direct Contact, WAC 173-349 ^a (mg/kg)		Groundwater Protection ^c	Ecological Indicator Concentration (mg/kg) ^d			Water (mg/L)	Soil (mg/kg)	Precision	Accuracy	Precision	Accuracy
		Method C Industrial	Method B Unrestricted										
Ethylbenzene	100-41-4	350,000	8,000	6.1	--	--	EPA Method 8260 – GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
Methyl Ethyl Ketone (MEK; 2-butanone)	78-93-3	Unlimited	48,000	19.6	--	--	EPA Method 8260 – GC/MS	0.01	0.01	≤30	(q)	≤20	(q)
Methyl Isobutyl Ketone (MIBK, hexone, 4-methyl-2-pentanone)	108-10-1	280,000	6,400	2.71	--	--	EPA Method 8260 – GC/MS	0.01	0.01	≤30	(q)	≤20	(q)
Methylene Chloride (dichloromethane)	75-09-2	17,500	133	0.0218	--	--	EPA Method 8260 – GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
Phenol	108-95-2	Unlimited	24,000	11	--	--	EPA Method 8270 GC/MS	0.01	0.33	≤30	(q)	≤20	(q)
Polychlorinated biphenyls ^e	1336-36-3	65.6	0.5	0.0165 ^b	0.65	--	EPA Method 8082 – GC	0.0005	0.0165	≤30	(q)	≤20	(q)
Tetrachloroethylene	127-18-4	243	1.85	0.00086	--	--	EPA Method 8260 – GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
Toluene	108-88-3	28,000	6,400	4.65	200	--	EPA Method 8260 – GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
Tributyl Phosphate	126-73-8	24,300	185	0.66	--	--	EPA Method 8270 – GC/MS	0.1	3.3	≤30	(q)	≤20	(q)
Trichloroethane; 1,1,1	71-55-6	Unlimited	72,000	1.58	--	--	EPA Method 8260 – GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
Trichloroethylene	79-01-6	328	2.5	0.00072	--	--	EPA Method 8260 – GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
Xylene (total)	1330-20-7	700,000	16,000	14.6	--	--	EPA Method 8260 – GC/MS	0.005	0.005	≤30	(q)	≤20	(q)
Total petroleum hydrocarbons – diesel to oil range (kerosene)	TPH DIESEL, TPH KEROSENE	2,000 ⁱ	2,000 ⁱ	2,000	200	--	NWIPH-D ^h	0.5	5	≤30	(q)	≤30	(q)
Soil Physical Properties:													
Bulk Density	N/A	N/A	--	N/A	N/A	--	ASTM D2937-04, <i>Standard Test Method for Density of Soil in Place by the Drive-Cylinder Method</i>	--	Wt %	N/A	N/A	N/A	N/A
Moisture Content	N/A	N/A	--	N/A	N/A	--	ASTM D2216-05, <i>Standard Test Methods for Laboratory Determination of Water (Moisture) Content of Soil and Rock by Mass</i>	--	Wt %	N/A	N/A	N/A	N/A
Particle Size Distribution	N/A	N/A	--	N/A	N/A	--	ASTM D422, <i>Sieve Analysis</i> ^g	--	Wt %	N/A	N/A	N/A	N/A



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CH2MHILL
Plateau Remediation Company
a Jacobs company

200-DV-1 Sampling and Analysis Plan (DOE/RL-2011-104) – Analytical Performance Requirements Continued

DOE/RL-2011-104, REV. 0

Table 2-2. Analytical Performance Requirements for Nonradionuclides

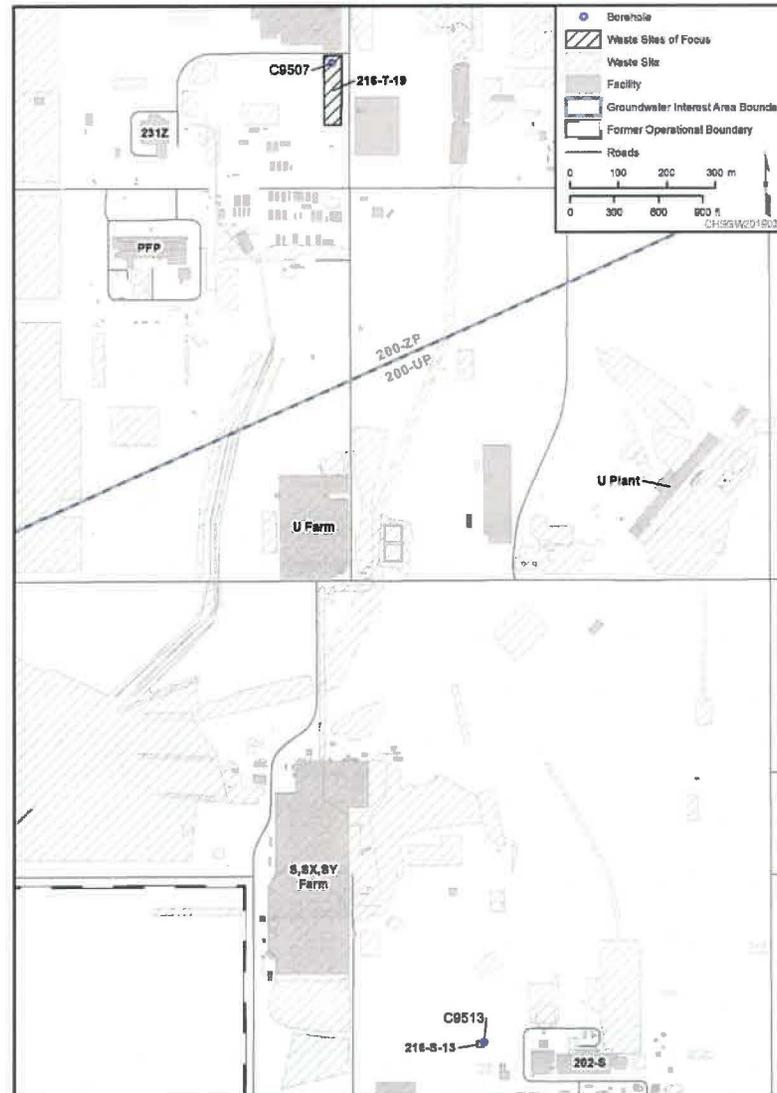
COPC	Chemical Abstracts Service No.	Preliminary Action Level ^a (mg/kg)				Hanford Site Background ^d	Name/ Analytical Technology ^h	Required Detection Limits (mg/kg) ^f		Soil ^g (%)		Water ^g (%)	
		Direct Contact, WAC 173-340 ^b (mg/kg)		Groundwater Protection ^c	Ecological Indicator Concentration (mg/kg) ^d			Water (mg/L)	Soil (mg/kg)	Precision	Accuracy	Precision	Accuracy
		Method C Industrial	Method B Unrestricted										

- a. The preliminary action level (from the data quality objectives process) is the regulatory or risk-based value used to determine appropriate analytical requirements (e.g., detection limits). Remedial action levels will be proposed in the feasibility study, will be finalized in the record of decision, and will drive remediation of the sites.
- b. Method C industrial is WAC 173-340-745(5), "Soil Cleanup Standards for Industrial Properties," "Method C Industrial Soil Cleanup Levels," and Method B residential is WAC 173-340-740(3), "Unrestricted Land Use Soil Cleanup Standards," "Method B Soil Cleanup Levels for Unrestricted Land Use," values from Ecology Publication 94-145, *Cleanup Levels and Risk Calculations under the Model Toxics Control Act Cleanup Regulation: CLARC, Version 3.1*, tables, updated November 2001.
- c. Calculated using WAC 173-340, "Model Toxics Control Act—Cleanup," three-phase model for soil concentrations protective of groundwater per WAC 173-340-747(4), "Deriving Soil Concentrations for Groundwater Protection," "Fixed Parameter Three-Phase Partitioning Model."
- d. Value is the lowest concentration for each analyte (adjusted for background) from Tables 749-2 and 749-3 of WAC 173-340-900, "Tables," amended February 12, 2001.
- e. Values are from DOE/RL-92-24, *Hanford Site Background: Part 1, Soil Background for Nonradioactive Analytes*, using the 90th percentile with a lognormal distribution.
- f. Required target quantitation limit for setting laboratory detection limits generally is established using the preliminary action levels or background, whichever is lowest.
- g. Precision and accuracy requirements as defined in EPA procedures and implemented by laboratory analysis and quality assurance procedures. Precision criteria for batch laboratory replicate sample analyses. Accuracy criteria for associated batch laboratory control sample percent with additional evaluations also performed for matrix spikes, tracers, and carriers as appropriate to the method.
- h. All samples analyzed in accordance with SW-946, *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, Third Edition, Final Update IV-E*, or EPA Method 200.8 in EPA/600/R-94/111, *Methods for the Determination of Metals in Environmental Samples, Supplement I*, or *Standard Methods for the Examination of Water and Wastewater* (4500-CN Cyanide, 4500-H+ pH value) unless otherwise noted.
- i. EPA Method 350.1 from EPA/600/4-79-030, *Methods for Chemical Analysis of Water and Wastes*.
- j. EPA Method 300.7 in EPA/600/4-86/024, *Development of Standard Methods for the Collection and Analysis of Precipitation*.
- k. EPA Method 300.0 in EPA/600/R-93/100, *Methods for the Determination of Inorganic Substances in Environmental Samples*.
- l. Based on Method A values from WAC 173-340-900, Tables 740-1 and 745-1, amended February 12, 2001.
- m. Ecology Publication 94-115, *Natural Background Soil Metals Concentrations in Washington State*.
- n. Because the calculated groundwater protection action level is less than the soil detection limit, the calculated value is replaced with the target quantitation limit required of the laboratory.
- o. Polychlorinated biphenyls (PCBs) will be evaluated in samples from 0 to 15 ft bgs using a phased approach. Aroclors (total PCBs) will be evaluated initially using EPA Method 8082. If Aroclors are not detected, additional analyses will be conducted using EPA Method 1631a to confirm that PCB congeners are not present or are present at low levels. The PCB congeners will be evaluated in accordance with WAC 173-340-708(8)(b), "Human Health Risk Assessment Procedures."
- p. From Ecology Publication ECY 97-602, *Analytical Methods for Petroleum Hydrocarbons*. The Ecology methods use a modification to EPA Method 8015.
- q. The accuracy criteria for organics is statistically derived.

- ASTM = American Society for Testing and Materials
- bgs = below ground level
- COPC = contaminant of potential concern
- DQO = data quality objective
- EPA = U.S. Environmental Protection Agency
- GC = gas chromatography
- GC/MS = gas chromatograph/mass spectrometry
- IC = ion chromatography
- ICP = inductively coupled plasma
- MEK = methyl ethyl ketone
- MIBK = methyl isobutyl ketone
- N/A = not available
- NWTPH-D = Northwest total petroleum hydrocarbon diesel
- RDL = required detection limit
- SM = Standard Methods
- TPH = total petroleum hydrocarbon
- WAC = Washington Administrative Code



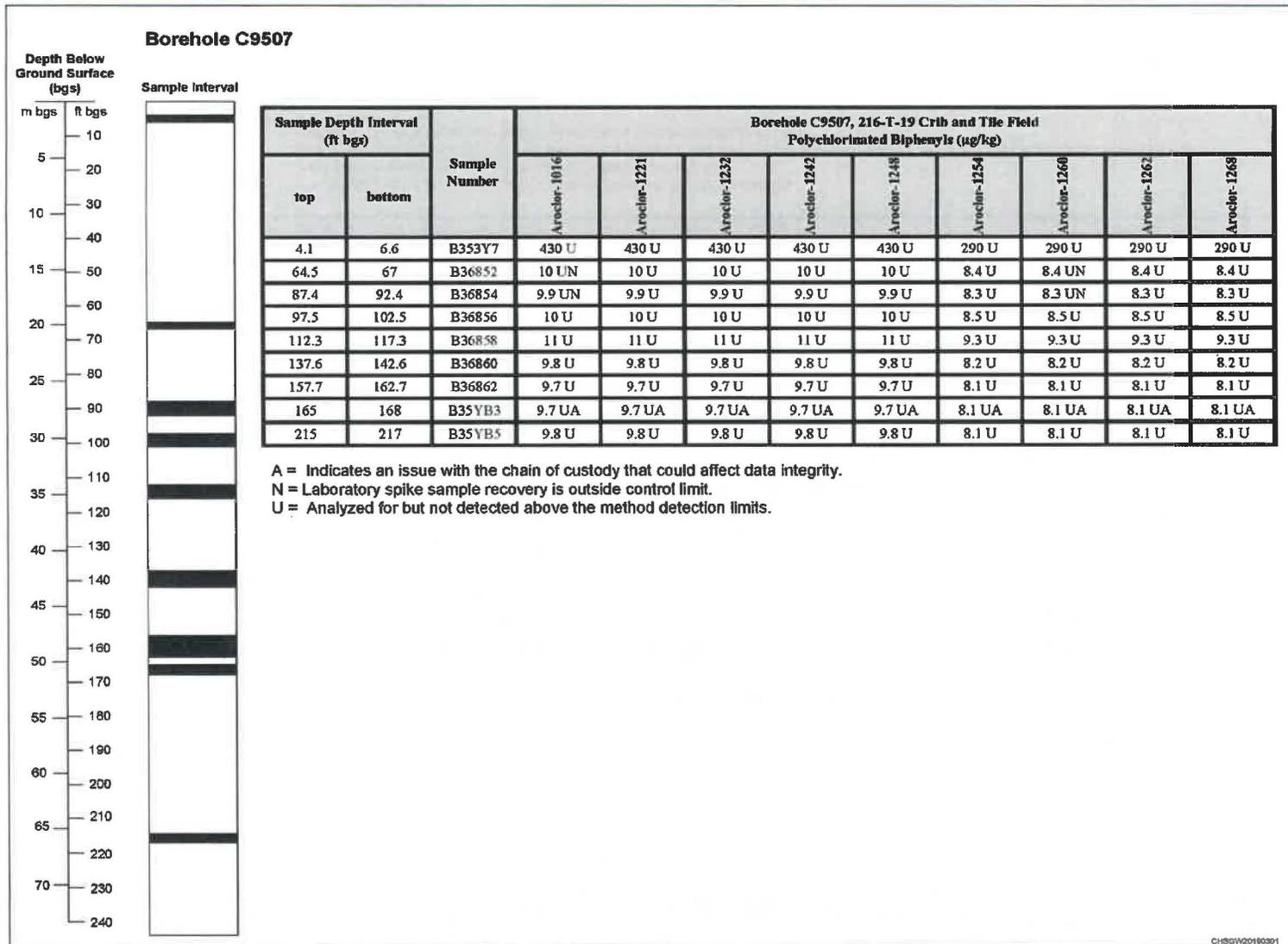
200-DV-1 Waste Sites 216-T-19 (Borehole C9507) and 216-S-13 (Borehole C9513)



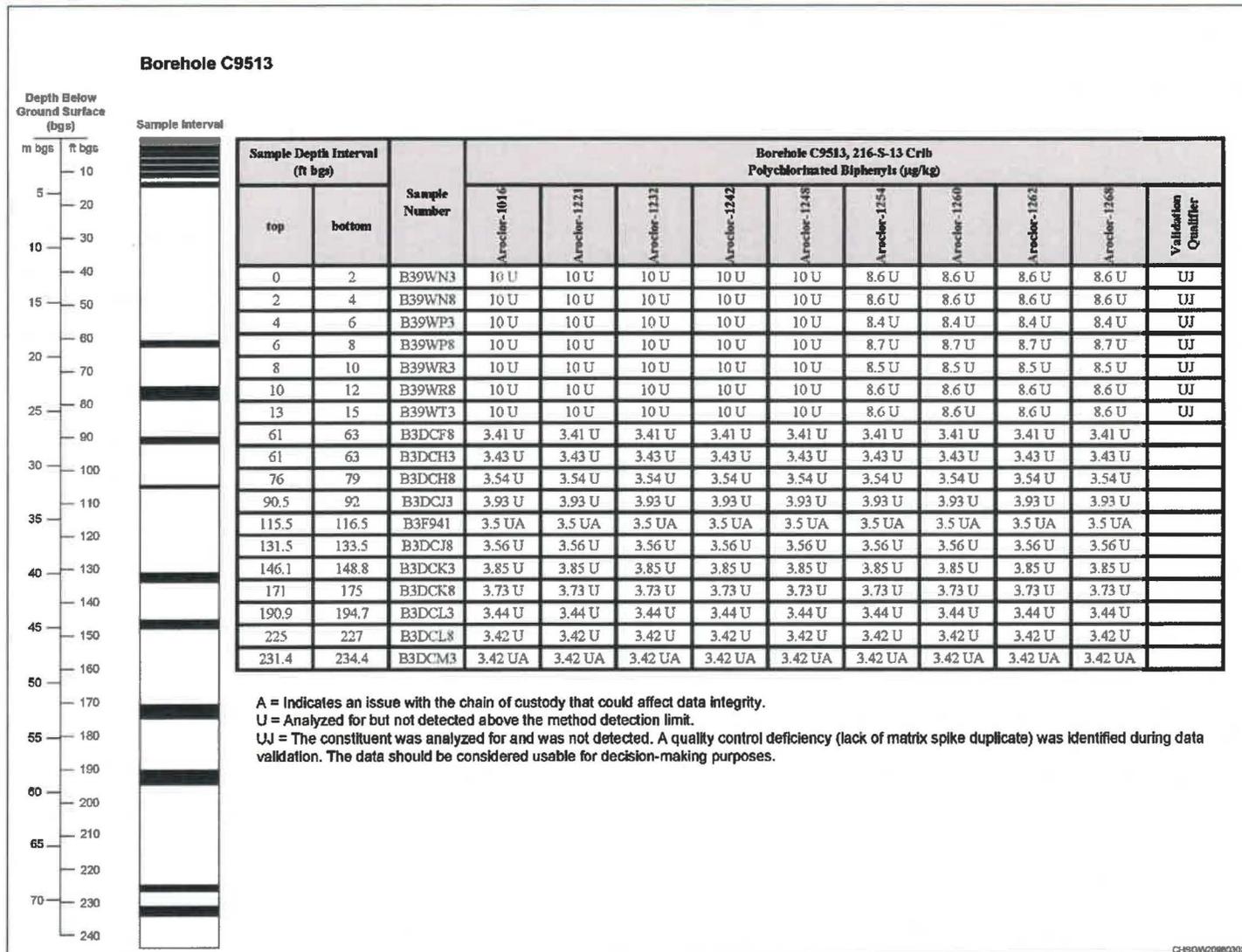
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200-DV-1 PCB Analysis – Waste Site 216-T-19 (Borehole C9507)



200-DV-1 PCB Analysis – Waste Site 216-S-13 (Borehole C9513)

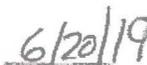
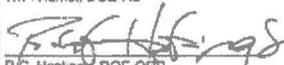
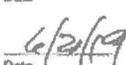
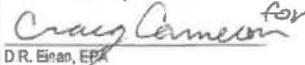


Recommendations

- Site 216-T-19
 - PCBs undetected in single sample (<15-ft) at an elevated Method Detection Limit (430 ug/kg); no PCBs were detected in other 8 samples at acceptable Method Detection Limits
 - Recommend re-sampling upper 15-ft for PCBs following the IAMIT Agreement approach for 200-EA-1 OU (IAMIT Determination 2019-003)
- Site 216-S-13
 - PCBs undetected at acceptable Method Detection Limits (10 µg/kg)
 - No further sampling/analysis required based on IAMIT Agreement for 200-EA-1 OU (IAMIT Determination 2019-003)



IAMIT Determination 2019-003

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER INTERAGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) DETERMINATION Number: <u>2019-003</u>	
<small>This form is intended to document the decisions and determinations made by the IAMIT within their authorities under the terms and conditions of the Hanford Federal Facility Agreement and Consent Order. This form is also intended to provide notification, to the affected persons, of the IAMITs decisions / determinations or actions assigned.</small>	
SUBJECT Determination: Tri-Party Project Manager agreement for 200-EA-1 Operable Unit (OU) to perform EPA Method 8082 on shallow-zone samples at 47 waste sites to evaluate risk to human health and the environment, and to perform EPA Method 1668 on any of the samples from the 20 waste sites listed below, where there is a Method 8082 detect above the practical quantitation limit (PQL).	
DETERMINATION The purpose of this determination is to confirm agreement among Tri-Party Project Managers from the U.S. Department of Energy, Richland Operations Office (DOE-RL); U.S. Department of Energy, Office of River Protection (DOE-ORP); the U.S. Environmental Protection Agency (EPA); and the Washington State Department of Ecology (Ecology) that the path forward to characterize soil for polychlorinated biphenyls (PCBs), aroclors, and congeners for the 200-EA-1 OU: <ul style="list-style-type: none"> • EPA Method 8082 will be performed on shallow-zone samples at 47 waste sites to evaluate risk to human health and the environment. <ul style="list-style-type: none"> ◦ 'Shallow zone' is defined as 0-15 feet below ground surface. • EPA Method 1668 will be performed on a sample from any one of the 20 waste sites listed below, if that sample has a Method 8082 detect above the PQL: <ul style="list-style-type: none"> ◦ The 20 waste sites include: 216-A-29, 2607-E12, 2607-EA, 200-E-292, 2607-E9, 2607-EF, 200-E-297, 200-E-142, 216-B-2-1, 216-B-2-2, 216-B-2-3, 216-B-12, 216-B-59 Trench, 216-B-59B Retention Basin, 2607-E3, 216-C-4, 2607-E5, 200-E-13, 2607-E6, and 200-E BP (selected based on process history). ◦ The highest allowable PQL for Aroclor-1254 and Aroclor-1280 is defined in the 200-EA-1 Operable Unit Waste Site RCRA Facility Investigation/Corrective Measures Study and Remedial Investigation/Feasibility Study Work Plan, Rev. 0 (DOE/RL-2016-58, Rev. 0) sampling and analysis plan. ◦ Ecology may request split samples consistent with Hanford Federal Facility Agreement and Consent Order, Action Plan, Section 4.1, Project Manager Role. 	
IS THIS DETERMINATION <input checked="" type="checkbox"/> FINAL <input type="checkbox"/> INTERIM (if further action to be taken)	
IAMIT MEMBER APPROVALS	
 W.F. Hamel, DOE-RL	 Date
 R.G. Hastings, DOE-ORP	 Date
 D.R. Eiran, EPA	 Date
 A.K. Smith, Ecology	 Date





TPA Interagency Management Integration Team Meeting

November 21, 2019

<u>Name</u>	<u>Organization</u>
<u>John Price</u>	<u>Ecology</u>
<u>Craig Cameron</u>	<u>EPA</u>
<u>Kim Welsch</u>	<u>Ecology</u>
<u>Bill Hamel</u>	<u>DOE-RL</u>
<u>Dave Eiran</u>	<u>EPA</u>
<u>John Neath</u>	<u>DOE-RL</u>
<u>Doug Hildebrand</u>	<u>DOE-RL</u>
<u>Rob Hastings</u>	<u>DOE-ORP</u>
<u>Stephanie Grasher</u>	<u>MSA</u>
<u>Scott Davis</u>	<u>MSA</u>
<u>Michael Turner</u>	<u>MSA</u>
<u>Mike Clire</u>	<u>DOE-RL</u>
<u>Kathy Higgins</u>	<u>DOE-RL</u>
<u>Rod Lobos</u>	<u>DOE-ORP</u>
<u>Adam Palomarez</u>	<u>Ecology</u>