

1227029



Inter-Agency Management Integration Team (IAMIT)
 Meeting Minutes
 August 21, 2014

Approval: *J. A. Hedges* Date: 9/25/14
J. A. Hedges
 Ecology IAMIT Representative

Approval: *R. J. Corey* Date: 9-22-2014
R. J. Corey
 DQE-RL IAMIT Representative

Approval: *T. W. Fletcher* Date: 9/22/14
T. W. Fletcher
 DOE-ORP IAMIT Representative

Approval: *B. A. Faulk* Date: 23 sept 14
B. A. Faulk
 EPA IAMIT Representative

Minutes Prepared by:

R. E. Piippo Date: 9-18-14
R. E. Piippo
 Mission Support Alliance, LLC

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Borghese, J. V.*	CHPRC	Hildebrand, D. R.*	DOE	Price, J.B.*	Ecology
Boyd, A.	Ecology	Hedges, J.A.	Ecology	Robertson, J. R.*	Freestone
Brown, M. J.	Ecology	Huffman, L.A.	ORP	Shattuck, A. F.	MSA
Butler, D. H.	MSA	Henry, D.	ODE	Singleton, D.	Ecology
Cameron, C.E.	EPA	Jim, R.	Yakama	Skinnarland, E.R.	Ecology
Charboneau, B.L.*	RL	Johnson, W.	MSA	Stubblebine, S. D.	MSA
Cimon, S.	ODE	Kemp, C. J.*	ORP	Teimouri, A.E.	HQ
Cline M. W.*	RL	Knox, K.*	KCR	Trimberger, B. R.*	ORP
Corey, R. J.	RL	Lobos, R.A.*	EPA	Varlsen, R.	Ecology
Dittmer, L.M.	CHPRC	Luke, J.J.	WRPS	Whalen, C.L.*	Ecology
Donnelly, J.W.	WRPS	Lynch, J.J.*	ORP	Welsch, K. R.*	Ecology
Eberlein, E.	Ecology	Mattlin, E. M.*	ORP	Williamson, B.D.	RL
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Faulk, D.A.	EPA	Niles, K.	ODE	Zelen, B. J.	RL
Fletcher, T.W.	ORP	Peschong, J.C.	RL	Administrative Record	
Gent, P.*	Ecology				

* Attendees

Topic: Key Documents/Issues List Review

ORP stated that the documents highlighted in blue have been submitted to Ecology, and ORP does not expect a response. The items highlighted in green are documents that have been submitted to Ecology, and ORP expects a response to those submittals. ORP noted that the document highlighted in green that requested to forego a third technology in C-101 was submitted, and a response letter was received from Ecology yesterday (8/20/14). This item will be changed in the key documents list and highlighted in blue. ORP stated that the target date reports were completed for the SX soil desiccation, the U Farm characterization, and the SST integrity analysis of record. ORP noted that the one-time supplemental treatment technologies report was deleted.

CHPRC provided a status on the DOE-RL decision documents list, noting that the text highlighted in blue in the comments/issues section has been updated. Regarding line 15 for the Central Plateau Source Inner Area risk assessment, Ecology asked why the status is no longer applicable/delete. CHPRC responded that there will be individual OU risk assessments. DOE-RL referred to the lag on the Outer Area submittal (line 27 on documents list), stating that the change notice was approved revising the due date. DOE-RL noted that instead of the revised due date being the date to submit the document, the due date will be to submit a new due date. DOE-RL explained that the purpose of establishing the dates in this manner was to keep the commitment on the books and to not have to obtain DOE-Headquarters' agreement on the commitment again. DOE-RL noted that EPA had made the proposal about revising the due dates in the change notice. EPA asked about the text in the comments/issues section, noting that a due date is given for the milestone. DOE-RL responded that the text needs to be more explicit.

Topic: M-015-112 200-IS-1 Work Plan Dispute Extension

DOE-RL stated that most of the issues associated with the 200-IS-1 work plan have been resolved, with the exception of some issues that DOE-RL considers to be legal issues. DOE-RL stated that based on that premise, some of the legal issues as to whether a site should be designated RCRA, CERCLA or past practice have been discussed by the technical staff for more than ten years, and the technical staff should instead be discussing what sampling and analysis needs to be done and how frequently.

DOE-RL proposed that the next step in the dispute would be to submit its position in a legal memorandum and attach it to a TPA change control form. DOE-RL indicated that its internal target is to complete the legal memo by the end of this month, and committed to submitting to Ecology the change control form with the legal memo attached by mid-September 2014. Ecology inquired about the change control form. DOE-RL responded that the change control form would propose categorizing certain waste sites as either RCRA or CERCLA, et cetera. DOE-RL

stated that it is important to reach resolution because most of the waste sites that it believes should be covered by 200-IS-1 are not categorized in IS-1. Ecology stated that the most recent information is that there are about 30 to 35 components that are in disagreement, and Ecology is proposing to do a change control form on the other non-issue 200 waste site components to incorporate them into Appendix C. DOE-RL stated that its team had been given the same direction. Ecology stated that it will proceed with its proposal as long as it has DOE-RL's commitment to the approach. Ecology added that a legal memo could represent the commitment to work on the 30 to 35 components and to resolve the RCRA/CERCLA integration issue.

DOE-RL stated that there are two implications associated with the RCRA/CERCLA issue, with one being the implication for a waste site determination within IS-1, and then the implication regarding treatment, storage and disposal (TSD) closures. Ecology concurred with DOE-RL's statement. DOE-RL stated that it has submitted closure plans, and there is an outstanding issue with the closure plans from last year associated with two of the ponds. Ecology responded that the ponds are not a part of IS-1. DOE-RL agreed, but stated that the legal memo will have implications on both of those areas because of the RCRA/CERCLA issue. Ecology agreed that there are two different issues that are related, and that there is contamination that was deposited in the ponds prior to the effective date of RCRA. Ecology added that the IS-1 issue is associated with pieces of ancillary equipment that were severed from the SST system and whether or not they are TSDs, even though they were connected into the SST system at one time.

Ecology asked if the legal memo will discuss both IS-1 and the ponds. DOE-RL responded that its understanding is the legal memo will only deal with the IS-1 piece, and the other closure plans have been in discussions for several weeks and are being addressed. DOE-RL added that its understanding regarding IS-1 and the other closure plans needs to be confirmed. Ecology asked about the path forward once the legal memo is submitted, stating that if it is submitted as a signed change package, the parties can enter into dispute on the Appendix C change package, but if it is sent as a draft, the parties would be in the same position as they are now.

DOE-RL reiterated its commitment to submit a legal memo to Ecology by mid-September 2014, and noted that the dispute period ends at the end of August 2014. DOE-RL asked how much time Ecology would need to respond to its position in the legal memo. Ecology stated that a response to DOE-RL's position is one issue, adding that progress is being made on the Data Quality Objective (DQO). Ecology indicated that it is in agreement with submitting the revised work plan in April 2015, with the assurance from DOE-RL that it is committed to submitting the work plan, has the funding to follow up with comment resolution, and will issue a signed work plan. DOE-RL responded that the intent is to follow through on the process and finalize the work plan. DOE-RL noted that it could not predict how much funding will be available, but there have been no internal

discussions about doing anything other than finalizing the documents. DOE-RL added that even in the worst funding scenarios, some core competency needs to be maintained in the areas associated with these documents.

Ecology pointed to line ten of the CHPRC decision documents list and asked if the milestone for the feasibility study in 200-EA-1 and 200-IS-1 would present enough of a funding driver to get comment resolution for IS-1, or whether another milestone would be needed to drive funding. DOE-RL responded that comment resolution generally does not require a large amount of funding, and an additional driver for funding was not needed. Ecology pointed out that funding issues stalled approval of the IS-1 work plan after it followed DOE-RL's guidance to submit a certain amount of comments. DOE-RL stated that its guidance was to submit 50 comments, which Ecology followed, although the process of responding to all the parts of the comments equated to about 150 comments. DOE-RL acknowledged that in the interim of Ecology providing all its comments, the funding was pulled.

Ecology noted that the milestone associated with the IS-1 work plan (M-015-92B) also includes 200-EA-1, and stated that the schedule for IS-1 needs to be more closely aligned with 200-WA-1. Ecology proposed that the parties revisit the milestones and consider separating IS-1 from EA-1, and then rearranging the schedule for IS-1 that is the same as or lags within a short amount of time with WA-1. DOE-RL noted that when a work plan is approved, the schedule for executing the work plan is approved and the parties will have to evaluate whether or not the schedule is appropriate. Ecology noted that the language in the milestone is not clear, and the point was to clarify the intent of the milestones.

Ecology initiated a discussion, indicating that it could be discussed outside of the IAMIT, about capturing the results of the DQO and revisions to the SAP as the parties proceed forward with the IS-1 work plan. Ecology indicated that the schedule to complete the DQO for IS-1 is mid-December 2014. DOE-RL stated that the current schedule is to complete all the DQO workshops and the SAP by the end of October 2014. DOE-RL added that there will be some special topics to resolve, which may take more time, and the parties would probably be done with the DQO by the end of November 2014. DOE-RL suggested that mid-December 2014 would be a good target date for the DQO and SAP. Ecology asked if it could look to the mid-December 2014 date to have the DQO completed to feed into the IS-1 work plan and SAP, assuming the RCRA/CERCLA integration issue is resolved. DOE-RL responded that that is the intent of the whole exercise.

Ecology noted that there have been a couple times that the parties have worked towards submitting the IS-1 work plan, and then the work was not completed. Ecology suggested building in some interim milestones to help DOE-RL justify funding. DOE-RL responded that the process has been to establish milestones to get on the compliance list and receive funding, but currently the funding required for the compliance list is less than what is received. DOE-RL noted that as a result, the Tri-Parties have come to agreement as to what compliance activities take

priority. DOE-RL stated that certain compliance activities are not getting done and enforcement actions have not been taken by Ecology or EPA; therefore Ecology and EPA must be concurring on the priorities that DOE-RL is working. EPA responded that priorities are discussed with DOE-RL, but it would characterize it as more of an understanding and tolerance than as concurrence. Ecology stated that there may be more enforcement action taken in the future, and the understanding is that a milestone needs to be met or agreement needs to be reached on changing it. Ecology added that just letting a milestone go by will probably not be occurring as much anymore.

Ecology stated that with DOE-RL's commitment to submit the legal memo by mid-September 2014, the IS-1 work plan dispute would be extended for 60 days until the end of October 2014. Ecology added that the dispute could be extended for another 30 days after that, depending on the status of the RCRA/CERCLA integration issue. DOE-RL and Ecology signed a 60-day extension period for the dispute on the IS-1 work plan.

Topic: Appendix C Update Process

DOE-RL initiated discussion regarding the Appendix C process for making a change in status to a waste site; i.e., adding a waste site to an OU, moving a waste site between OUs, or verifying the waste site is clean, closed or deleted from the MPL. DOE-RL indicated that a problem with Appendix C is the changes are bundled, which can create an issue with getting them signed if there is a controversy such as determining whether a waste site falls under RCRA or CERCLA. DOE-RL noted that most of the waste sites that are added to the Waste Identification Data System (WIDS) are not controversial. DOE-RL stated that the bundled changes are submitted quarterly, and the result is a thick document with hundreds of waste sites, requiring a lot of coordination.

DOE-RL suggested that the parties consider updating the WIDS process so the WIDS form could be modified and used to add a waste site to an OU or move a waste site between OUs. DOE-RL stated that the modification would reduce the coordination needed and expedite the process. DOE-RL stated that for Appendix C updates, a staff member types the change in a Word file and it is uploaded into the TPA website. DOE-RL suggested creating a form from the Appendix C database that would help eliminate errors with transposing the information, and a monthly printout could be done and posted on the TPA website. DOE-RL noted that theoretically the posting should never be more than 30 days old. DOE-RL also suggested eliminating the approvals to update Appendix C and place them in the WIDS process where there are individual forms having the IAMIT approve the WIDs form. Ecology asked if DOE-RL has reviewed the area in the TPA where approvals are called out. DOE-RL stated that the TPA needs to be looked at, and proposed that the Tri-Parties designate a person to follow the process and review what, if anything, would have to be changed in the TPA to allow revising the approval process.

Ecology responded that it was unaware of the Appendix C process not working well, with the exception of the 200-IS-1 change package. MSA stated that a change request was established in 2012 for the 100 Areas, adding 150 waste sites, and the change request remains in limbo. MSA noted that since that time, another 100 waste sites have been added. DOE-RL pointed out that those waste sites are not related to IS-1. Ecology asked why it hasn't been notified that the change control form for the 100 Area has languished for two years. MSA responded that was the reason for the suggestion to assign staff to track the process through to approval, noting that there is no tracking mechanism for the large Appendix C change requests in project manager meetings or quarterly's. Ecology stated the preference is to review the 100 Area change package and expedite it, rather than modifying the Appendix C process. Ecology expressed the concern that modifying the Appendix C process would involve the lawyers, whose time is taken up with the current Consent Decree negotiations. Ecology suggested taking on the large change control forms and stripping out the few sites that are in dispute, approve the remaining sites, and then focus on the smaller group that had been stripped out. The parties agreed to bifurcate the IS-1 change package in an effort to expedite the easier issues and then resolve the more complex issues. DOE took an action to resubmit the IS-1 change package comprised with the waste sites DOE-RL believes the parties are in agreement with.

EPA stated that DOE-RL's proposal to change the Appendix C process would pose issues with configuration control. EPA noted that work plans are received that are different than what is in Appendix C. DOE-RL stated that the draft IS-1 work plan that was previously reviewed doesn't match Appendix C because Appendix C had less than half of the proposed waste sites in it. Ecology acknowledged that was a special case, and stated that it would prefer to set it aside. DOE-RL stated that the 100 Areas is not a special case, and the cleanup has been executed but is not listed in Appendix C as being part of the OUs. MSA took an action to send Ecology the 100 Areas change package via email today that was originally submitted in 2012. Ecology indicated that it will investigate why the change package has been languishing in an effort to correct the problem.

Ecology stated that Appendix C changes should be regular business during the IAMIT meeting, and the parties agreed requesting that MSA add Appendix C changes as a topics to the IAMIT agenda. EPA stated that if the WIDS database could be used to run a report at the end of every month to review changes and use that to inform a change request during the IAMIT meeting, that would be an effort worth pursuing. DOE-RL stated that it plans to move forward to automate the WIDS process and eliminate the manual transposing of information, and at the same time it will verify whether there are any inconsistencies between Appendix C and WIDS.

Ecology stated that since a discussion regarding Appendix C was brought up, Appendix B is out of date and needs to be updated. DOE agreed, adding that a

proposal had been made to Ecology regarding the disagreement on the issue of classification. Ecology stated that it made a couple of draft change requests for Appendix B that have not gone through. DOE responded that several years ago Ecology had made a suggestion that was a good path forward regarding the soils around tank farms. Ecology agreed that the Appendix B listing has numerous old OUs that are out of date. DOE suggested establishing a team to update Appendix B. Ecology offered to send CHPRC one of the draft change requests for Appendix B. CHPRC indicated that that would be a good starting point to work on Appendix B.



August 21, 2014
Ecology Offices, Conference Room 3A/B
3100 Port of Benton Blvd
Richland, Washington

Agenda

Inter-Agency Management Integration Team Meeting

Chairperson: John Price

10:05 a.m.	ORP/RL Key Documents List Review
10:20 a. m.	M-015-112, IS-1 work plan dispute extension
10:35 a. m.	Appendix C update process
10:50 a. m.	Adjourn Inter-Agency Management Integration Team Meeting

CHPRC TPA Decision Document List

	Geographical Areas	Location	ROD Area	Document	Milestone Title	Milestone	Due Date	Regulatory Review	DOE Lead	CHPRC Lead	Regulatory Lead	Agency	Comments/Issues
1	Central Plateau Source Inner Area	200 East Inner Area/Pipelines	200-IS-1	RFI/CMS & RI/FS Work Plan - Draft B	Submit Draft B RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) & Remedial Investigation/Feasibility Study (RI/FS) work plan for 200-IS 1 OU to Ecology	M-015-112	2/28/2014	TBD	D. Hildebrand	B. Day	Nina Menard	Ecology	DOE and Ecology agreed, on June 17, 2014 to extend dispute resolution at the project manager level to August 30, 2014. The schedule for completion of the work plan and the incorporation of central plateau principles is currently being discussed with the regulatory agencies. The list of 200-IS-1 OU waste sites is also not agreed to at this time (anticipate ~ 230 additional waste sites).
2	Central Plateau Source Inner Area	200 East Inner Area/Pipelines	200-EA-1	RFI/CMS & RI/FS Work Plan	Submit a RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study work plan for the 200-EA-1 operable unit to Ecology	M-015-92A	6/30/2015	7/1/2015 8/31/2015	D. Hildebrand	B. Day	Nina Menard	Ecology	TPACN M-15-11-03 changed due date to 6/30/2015. Project is not funded in FY14; Milestone will be missed.
3	Central Plateau Source Inner Area	200 East Inner Area/Pipelines	200-EA-1	TSD - Closure Plans for 207-A South Retention Basin, 216-A-29 Ditch, 216-A-36B Crib, 216-A-37-1 Crib, and 216-B-63 Trench	Submit Revised Closure Plan to support TSD closure for five (5) TSD Units	M-037-02	*MS Completed 6/23/14	6/24/2014 8/14/2014	J. Axtel	Phil Burke	Nina Menard	Ecology	
4	Central Plateau Source Inner Area	200 East Inner Area/Pipelines	200-EA-1	216-A-37-1 Crib Closure Plan (D-2-10), DOE/RL-2005-88, Revision 0		M-037-02	*MS Completed 6/23/14	6/24/2014 9/24/2014	J. Axtel	Phil Burke	Nina Menard	Ecology	
5	Central Plateau Source Inner Area	200 East Inner Area/Pipelines	200-EA-1	207-A South Retention Basin Closure Plan (S-2-7), DOE/RL-2005-89, Revision 0		M-037-02	*MS Completed 6/23/14	6/24/2014 9/24/2014	J. Axtel	Phil Burke	Nina Menard	Ecology	
6	Central Plateau Source Inner Area	200 East Inner Area/Pipelines	200-EA-1	216-A-36B Crib Closure Plan (D-2-4), DOE/RL-2005-90, Revision 0		M-037-02	*MS Completed 6/23/14	6/24/2014 9/24/2014	J. Axtel	Phil Burke	Nina Menard	Ecology	
7	Central Plateau Source Inner Area	200 East Inner Area/Pipelines	200-EA-1	216-B-63 Trench Closure Plan (D-2-6), DOE/RL-2006-11, Revision I		M-037-02	*MS Completed 6/23/14	6/24/2014 8/24/2014	J. Axtel	Phil Burke	Nina Menard	Ecology	
8	Central Plateau Source Inner Area	200 East Inner Area/Pipelines	200-EA-1	216-A-29 Ditch Closure Plan (D-2-3), DOE/RL-2008-53, Revision 1		M-037-02	*MS Completed 6/23/14	6/24/2014 8/24/2014	J. Axtel	Phil Burke	Nina Menard	Ecology	
9	Central Plateau Source Inner Area	200 East Inner Area/Pipelines	200-EA-1	200 East CP Inner Area Risk Assessment				TBD	J. Hansen	Phil Burke	Nina Menard	Ecology	NO LONGER APPLICABLE DELETE (Delete after August)
10	Central Plateau Source Inner Area	200 East Inner Area/Pipelines	200-EA-1 and 200-IS-1	CMS & FS Report(s) & PCAD(s)/PP(s)	Submit Corrective Measures Study & Feasibility Study Report(s) and Proposed Corrective Action Decision(s)/Proposed Plan(s) for the 200-EA-1 and 200-IS-1 OUs to Ecology	M-015-92B	12/31/2016	1/1/2017 2/14/2017	D. Hildebrand	B. Day	Nina Menard	Ecology	TPA Change Package M-15-11-03 changed due date to 12/31/2016. Milestone is at risk: 200-IS-1 Work Plan is in progress with the delivery date still under negotiation and the 200-EA-1 Work Plan is not funded in FY14.
11	Central Plateau Source Inner Area	200 West Inner Area	N/A	EE/CA Tier 2 Facilities - 200 West				TBD	A. Farabee	Phil Burke	E. Lajja	EPA	Tentative agreement to merge with 200 East Area EE/CA.
12	Central Plateau Source Inner Area	200 East Inner Area/Pipelines	200-EA-1 and 200-IS-1	Record of Decision				TBD	D. Hildebrand	B. Day	Nina Menard	Ecology	
13	Central Plateau Source Inner Area	200 East Inner Area/Pipelines	200-WA-1	TSD - Closure Plan for the Hexone Storage and Treatment Facility TSD Unit	Submit Revised Closure Plan to support TSD closure of the Hexone Storage and Treatment Facility (276-S-141/142) TSD Unit.	M-037-01	*MS Completed 7/16/2010		K. Leary	Phil Burke	Nina Menard	Ecology	Comments received. Project not funded to address comments.
14	Central Plateau Source Inner Area	200 West Inner Area	200-WA-1 and 200-BC-1	RI/FS Work Plan	Submit a Remedial Investigation/Feasibility Study Work Plan for the 200-WA-1 operable unit to EPA	M-015-91A	*MS Completed 12/27/2011		J. Sands	Phil Burke	Craig Cameron	EPA	Received EPA comments 5/15/12. The Rev 0 submittal is targeted for delivery to the regulatory agencies on December 18, 2014.
15	Central Plateau Source Inner Area	200 West Inner Area	200-WA-1 and 200-BC-1	200 West CP Inner Area Risk Assessment				TBD	J. Sands	Phil Burke	E. Lajja - EPA Beth Rochette - Ecy	Dual	NO LONGER APPLICABLE DELETE (Delete after August)
16	Central Plateau Source Inner Area	200 West Inner Area	200-WA-1 and 200-BC-1	FS/PP	Submit Feasibility Study report and Proposed Plan for the 200-WA-1 operable unit to EPA	M-015-91B	12/31/2015	1/1/2016 2/15/2016	J. Sands	Phil Burke	Craig Cameron	EPA	Milestone will be missed due to delays in completion of the 200-WA-1 RI/FS Work Plan.
17	Central Plateau Source Inner Area	200 West Inner Area	200-WA-1 and 200-BC-1	Record of Decision				TBD	J. Sands	Phil Burke	Craig Cameron	EPA	
18	Central Plateau Source Inner Area	200 West Inner Area	200-SW-2	RFI/CMS & RI/FS Work Plan - Draft B	Submit Draft B RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) & Remedial Investigation/Feasibility Study (RI/FS) work plan for the 200-SW-2 OU to Ecology	M-015-113	3/31/2015	4/1/2015 5/15/2015	D. Hildebrand	Phil Burke	Deborah Singleton	Ecology	A revised draft TPA change control form was approved on July 22, 2014, to extend the due date for TPA Interim Milestone M-015-113, "Submit Draft B, 200-SW-2 Radioactive Landfills Group RFI/CMS/RI/FS Work Plan to Ecology" to March 31, 2015.
19	Central Plateau Source Inner Area	200 West Inner Area	200-SW-2	RFI/CMS & RI/FS & PCAD/PP	Submit RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study Report and Proposed Corrective Action Decision/Proposed Plan for the 200-SW-2 OU to Ecology	M-015-93B	12/31/2016	1/1/2017 2/14/2017	D. Hildebrand	Phil Burke	Deborah Singleton	Ecology	Milestone is at risk due to delays in completion of the 200-SW-2 RI/FS Work Plan.
20	Central Plateau Source Inner Area	200 West Inner Area	200-SW-2	Record of Decision				TBD	D. Hildebrand	Phil Burke	Deborah Singleton	Ecology	
21	Central Plateau Source Inner Area	200 West and 200 East	200-PW-1/3/6, CW-5	RD/RAWP	Submit a Remedial Design/Remedial Action Work Plan for 200 CW-5 and 200-PW-1/3/6 to EPA as described in section 12.4 of the associated ROD.	M-016-125	9/30/2015	10/1/2015 11/16/2015	G. Sinton	B. Day	Emy Lajja	EPA	
22	Central Plateau Source Deep Vadose Zone	Deep Vadose Zone	200-DV-1	RI/FS Work Plan	Submit RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) & Remedial Investigation/Feasibility Study (RI/FS) work plan for the 200-DV-1 OU to Ecology. The work plan shall include technology screening that identifies technologies applicable for characterization, treatment, and monitoring of deep vadose zone contaminants.	M-015-110A	3/31/2015	4/1/2015 6/1/2015	J. Morse	M. Byrnes	Dib Goswami	Ecology	Draft A RI/FS and RFI/CMS Work Plan is on schedule to be delivered to Ecology by March 31, 2015.
23	Central Plateau Source Deep Vadose Zone	Deep Vadose Zone	200-DV-1	CMS/FS and PP/PCAD	Submit Corrective Measures Study & Feasibility Study Report and Proposed Plan/Proposed Corrective Action Decision for the 200-DV-1 OU to Ecology	M-015-110B	9/30/2015	TBD TBD	J. Morse	M. Byrnes	Dib Goswami	Ecology	This milestone is to be missed. With the RI/FS and RFI/CMS work plan being submitted to Ecology on 9/30/14 for review, the Corrective Measures Study & Feasibility Study Report and Proposed Plan/Proposed Corrective Action Decision cannot be completed by 9/30/2015 since the field work will not have been completed yet. This milestone date will need to be moved out.
24	Central Plateau Source Deep Vadose Zone	Deep Vadose Zone	200-DV-1	Record of Decision				TBD	J. Morse	M. Byrnes	Dib Goswami	Ecology	

Note: Yellow highlighted items reflect completed milestone/target. Left on long list for followup status. Blue text reflects changes from previous month.

(Information current as of 8/18/14)

CHPRC TPA Decision Document List

	Geographical Areas	Location	ROD Area	Document	Milestone Title	Milestone	Due Date	Regulatory Review	DOE Lead	CHPRC Lead	Regulatory Lead	Agency	Comments/Issues
25	Central Plateau Source Outer Area	Outer Area	200-CW-1, 200-CW-3, and 200-OA-1	Central Plateau Outer Area RI/FS work plan/SAP/BRA			10/30/2015	TBD	G. Sinton	Phil Burke	L. Buelow	EPA	EPA approval was received on July 21, 2014, to revise the Outer Area RI/FS and PP milestone M 015-388 due 10/30/14. The Change Control Form extends the milestone to October 30, 2015 to submit a revised FS/PP for CW 1, CW-3 and OA-1.
26	Central Plateau Source Outer Area	Outer Area	200-CW-1, 200-CW-3, and 200-OA-1	RI/FS workplan Eco SAP			TBD	TBD	J. Hansen	Phil Burke	L. Buelow	EPA	Draft A Eco SAP provided to Regulators (DOE/RL-2011-118).
27	Central Plateau Source Outer Area	Outer Area	200-CW-1, 200-CW-3, and 200-OA-1	FS/PP	Submit a revised Feasibility Study Report and revised Proposed Plan(s) for the 200-CW-1, 200-CW-3, and 200-OA-1 Operable Units for Waste Sites in the Outer Area of the Central Plateau to EPA	M-015-388	10/30/2015	11/1/2015 12/15/2015	G. Sinton	Phil Burke	L. Buelow	EPA	EPA approval was received on July 21, 2014, to revise the Outer Area RI/FS and PP milestone M 015-388 due 10/30/14. The Change Control Form extends the milestone to October 30, 2015 to submit a revised FS/PP for CW 1, CW-3 and OA-1.
28	Central Plateau Source Outer Area	Outer Area	200-CW-1, 200-CW-3, and 200-OA-1	Record of Decision			TBD		G. Sinton	Phil Burke	L. Buelow	EPA	
29	Central Plateau Source Outer Area	Outer Area	200-CW-1, 200-CW-3, and 200-OA-1	TSDs - Closure Plan for 216-B-3 Main Pond and 216-S-10 Pond and Ditch	Submit Revised Closure Plans	M-037-03	*Milestone Completed 4/18/2013	4/19/2013 7/17/2013	G. Sinton	Phil Burke	Nina Menard	Ecology	NOD issued. CHPRC and RL are discussing strategy for responding and resubmitting the closure plans.
30	Central Plateau Groundwater	200 East Area Groundwater	200-BP-5, 200-PO-1	200-BP-5 RI Report			6/30/2015	7/1/2015 8/15/2015	J. Morse	Curt Wittreich	Nina Menard	Ecology	Preparation of the BP-5 RI Report in progress.
31	Central Plateau Groundwater	200 East Area Groundwater	200-BP-5, 200-PO-1	FS/PP	Submit a 200-BP-5 and 200-PO-1 OU Feasibility Study Report and Proposed Plan(s) to Ecology	M-015-21A	6/30/2015	7/1/2015 8/15/2015	J. Morse	Curt Wittreich	Nina Menard	Ecology	To be missed. Not funded in FY14 to initiate document preparation. Expect to start working on the FS/PP in FY15 with an expected Draft A delivery 6/30/2016.
32	Central Plateau Groundwater	200 West Area Groundwater	200-UP-1	Technology Evaluation Plan	Submit I-129 Technology Evaluation Plan Draft A to EPA as defined in the 200-UP-1 RD/RA WP	M-016-192	6/17/2016	6/18/2016 8/1/2016	N. Bland	Curt Wittreich	E. Laija	EPA	
33	River Corridor	100-B/C	100-BC-1, 100-BC-2, 100-BC-5	RI/FS Reports and Proposed Plan	Submit RI/FS Report and PP for 100-BC	M-015-79	12/15/2016	12/16/2016 01/30/2017	G. Sinton	Phil Burke	L. Buelow	EPA	
34	River Corridor	100-B/C	100-BC-1, 100-BC-2, 100-BC-5	Record of Decision			TBD		G. Sinton	Phil Burke	L. Buelow	EPA	
35	River Corridor	100-B/C	100-BC-1, 100-BC-2, 100-BC-5	Remedial Design / Remedial Action Work Plans			TBD	TBD	G. Sinton	Phil Burke	L. Buelow	EPA	
36	River Corridor	100-D/H	100-DR-1, 100-DR-2, 100-HR-1, 100-HR-2, 100-HR-3	RI/FS Reports and Proposed Plan	Submit FS & PP for HR 1/2/3 and DR 1/2	M-015-70-T01	*Target Completed 12/14/2012	12/15/2012 03/13/2013	J. Hanson	Ella Feist	Nina Menard	Ecology	<ul style="list-style-type: none"> On July 2, 2014, RL requested an extension to September 30, 2014 (14-AMRP-0230), to complete the RI/FS to Rev 0, with transmittal of Rev 0 to Ecology subsequent to that date. RL and Ecology's goal is to submit the Proposed Plan for public review by end of 2015 or early January 2015. RL and Ecology are in the process of establishing the schedule for the EPA remedy review board.
37	River Corridor	100-D/H	100-DR-1, 100-DR-2, 100-HR-1, 100-HR-2, 100-HR-3	Record of Decision			TBD		J. Hanson	Ella Feist	Nina Menard	Ecology	
38	River Corridor	100-D/H	100-DR-1, 100-DR-2, 100-HR-1, 100-HR-2, 100-HR-3	Remedial Design/Remedial Action Work Plans			TBD	TBD	J. Hanson	Ella Feist	Nina Menard	Ecology	
39	River Corridor	100-F/IU	100-FR-1, 100-FR-2, 100-FR-3, 100-IU-2, 100-IU-6	RI/FS Reports and Proposed Plan	Submit RI/FS Report and PP for 100-F/IU.	M-015-64-T01	*Target Completed 12/20/2012	12/21/2012 03/4/2013	G. Sinton	Phil Burke	C. Guzzetti	EPA	
40	River Corridor	100-F/IU	100-FR-1, 100-FR-2, 100-FR-3, 100-IU-2, 100-IU-6	Record of Decision			Anticipated 9/30/14		G. Sinton	Phil Burke	C. Guzzetti	EPA	EPA RL targeting September 30, 2014 for the ROD.
41	River Corridor	100-F/IU	100-FR-1, 100-FR-2, 100-FR-3, 100-IU-2, 100-IU-6	Remedial Design / Remedial Action Work Plans			TBD	TBD	G. Sinton	Phil Burke	C. Guzzetti	EPA	
42	River Corridor	100-K	100-KR-1, 100-KR-2, 100-KR-4	RI/FS Reports and Proposed Plan	Submit RI/FS Report and PP for 100-K.	M-015-66-T01	*Target Completed 9/21/2011		J. Hanson	Ella Feist	C. Guzzetti	EPA	RI/FS and PP, Rev 0, are on hold pending additional characterization boreholes at 100-KE Reactor waste sites.
43	River Corridor	100-K	100-KR-1, 100-KR-2, 100-KR-4	Record of Decision			TBD		J. Hanson	Ella Feist	C. Guzzetti	EPA	
44	River Corridor	100-K	100-KR-1, 100-KR-2, 100-KR-4	Remedial Design / Remedial Action Work Plans			TBD	TBD	J. Hanson	Ella Feist	C. Guzzetti	EPA	
45	River Corridor	100-N	100-NR-1, 100-NR-2	RI/FS Reports and Proposed Plan	Submit FS/PP for NR 1/2	M-015-75	*Milestone Completed 6/24/2013	6/25/2013 10/2/2013	M. Thompson	Bill Faught	A. Boyd	Ecology	ECY sent letter 8/5/13 requesting an extension of review period. Regulator comments received on 10/2/13. RL reviewing comments and issued an extension request letter for 120 days (February 28th). Ecology is not reviewing the PP until RI/FS comment resolution complete. Disposition meetings with ECY have begun and occur weekly. A second extension letter was sent by RL requesting an additional 120-day period (June 28th) to issue Rev 0. A third extension letter was issued at the end of June requesting an additional 120-days (October 28th) for RI/FS completion. ECY has agreed to expedite the review of the I-ROD RD/RAWP simultaneously with the RI/FS to allow field work to begin on the barrier as soon as possible.
46	River Corridor	100-N	100-NR-1, 100-NR-2	Record of Decision			Anticipated Q4 2015		M. Thompson	Bill Faught	Alicia Boyd - Ecy Laura Buelow - EPA	Dual	
47	River Corridor	100-N	100-NR-1, 100-NR-2	Remedial Design / Remedial Action Work Plans			TBD	TBD	M. Thompson	Bill Faught	A. Boyd	Ecology	
48	River Corridor	300	300-FF-2, 300-FF-5	Remedial Design / Remedial Action Work Plans	Submit RD/RA WP Draft A to Regulators		5/25/2014	5/26/2014 8/8/2014	M. Thompson	B. Day	Benjamin Simes	EPA	EPA requested a 30 day extension on July 7, 2014. This extends the review from July 9, 2014 to August 8, 2014. Comments were received on August 8 th .

Note: Yellow highlighted items reflect completed milestone/target. Left on long list for followup status. Blue text reflects changes from previous month.

WORKING ORP Key Documents List – August 2014

Milestone Title	Milestone Tie	Document	TPA Milestone Due Date (if applicable) ¹	ORP Delivery to Regulators Date ²	Anticipated Regulatory Review Completion Date ³	Final Completion Date ⁴	DOE-ORP Lead	Contractor Lead	Ecology Lead	Comments/Issues
ORP and Ecology will review the reports generated in M-045-22-T01, -T02, and -T03 and determine whether to continue with soil desiccation/contaminant removal testing and other interim measures (TPA MS M-045-22).	M-045-22-T01	Submit Results of VZ Characterization of 241-TX to ECY	09/30/14				D. Hildebrand	S. Eberlein	J. Lyon	
	M-045-22-T02	Submit Results of VZ Characterization of 241-U to ECY	04/30/14	02/20/14	N/A	02/20/14	D. Hildebrand	S. Eberlein	J. Lyon	• Sent to ECY on 02/20/14 via ORP Letter 14-TF-0015.
	M-045-22-T03	Submit SX Soil Desiccation/Contaminant Removal Tech Results to ECY	07/31/14	05/15/14	N/A	05/15/14	D. Hildebrand	S. Eberlein	J. Lyon	• Sent to ECY on 05/15/14 via ORP Letter 14-TF-0054.
Submit to Ecology for Review and Approval as an Agreement Primary Document, a Phase 2 RCRA Facility Investigation/Corrective Measure Study Report for WMA-C	Supports M-045-61	WMA-C PA Initial Model Run Data Package		TBD			C. Kemp	S. Eberlein	J. Lyon	• Feeds input for M-045-61 and all Closure Plans
		WMA-C PA Initial Document		TBD			C. Kemp	S. Eberlein	J. Lyon	• Feeds input for M-045-61 and all Closure Plans
		WMA-C Characterization Summary 2013		TBD			C. Kemp	S. Eberlein	J. Lyon	• Feeds input for M-045-61 and all Closure Plans
M-045-61	Phase 2 RFI/CMS Report for WMA-C	12/31/14	TBD			C. Kemp	S. Eberlein	J. Lyon	• Reported as To Be Missed in the March 2013 TPA PMM. Discussions ongoing at the PM level.	
Submit to Ecology for Review and Approval as an Agreement Primary Document, a Phase 2 Corrective Measures Implementation Work Plan for WMA-C.	M-045-62	Phase 2 Corrective Measures Implementation Work Plan for WMA-C	06/30/15	TBD			C. Kemp	S. Eberlein	J. Lyon	• Reported as To Be Missed in the March 2013 TPA PMM. Discussions ongoing at the PM level.
CD 08-5085-FVS Appendix C	CD	Request to Forego 3 rd Technology in Tank 241-C-101	N/A	02/18/14	ECY Response Needed		C. Kemp	S. Eberlein	J. Lyon	• ORP provided this request to forego to ECY for their review on 02/18/14 via ORP Letter 14-TF-0012.
Submit RDR after WMA-C SST Retrieval Completion Certifications	M-045-86	RDR for SST C-110, embedded TPA milestone M-045-86H	01/29/15	08/06/14	N/A	08/06/14	C. Kemp	S. Eberlein	J. Lyon	• CD Retrieval Completion Certification for SST C-110 sent to ECY on 01/29/14 via ORP Letter 14-TF-0007. • Submitted to ECY via ORP Letter 14-TF-0086 on 08/06/14.
Prior to beginning construction & at least one year before construction is to be complete, DOE will submit to Ecology a final design & monitoring plan for each interim barrier.	M-045-920	Future Barrier Design 3	06/30/15	06/30/15			C. Kemp	S. Eberlein	J. Lyon	• ORP/ECY TPA Change Package M-45-12-04 modified this to a due date of 06/30/15 dependent on discussions per M-045-22.
	M-045-92P	Future Barrier Design 4	06/30/16	06/30/16			C. Kemp	S. Eberlein	J. Lyon	• ORP/ECY TPA Change Package M-45-12-04 modified this to a due date of 06/30/16 dependent on discussions per M-045-22.
M-045-91 Interim Milestones and Target Dates for SST Integrity Implementing the Expert Panel's Recommendations	M-045-91G-T03	Provide AOR Final Doc. for SSTs on 1,000,000 Gallon Tanks	10/31/14	10/31/14	N/A	07/07/14	J. Johnson	R. Gregory	J. Lyon	• Sent to ECY on 07/07/14 via ORP Letter 14-TF-0074.
	M-045-91F-T04	Provide Report on 100-Series SSTs as having Leaked in RPP-32681	12/26/14	12/26/14			J. Johnson	R. Gregory	J. Lyon	
	M-045-91G-T04	Provide AOR Final Doc. for SSTs on 55,000 Gallon Tanks	01/30/15	01/30/15			J. Johnson	R. Gregory	J. Lyon	
	M-045-91B-T01	Provide Ecology report on the Concrete Core from TankA-106 or alt	01/31/15	01/31/15			J. Johnson	R. Gregory	J. Lyon	
	M-045-91F-T02	Provide Report of Liner Failures for SSTs	03/31/15	03/31/15			J. Johnson	R. Gregory	J. Lyon	
	M-045-91F	Provide Summary Conclusions Report on Leak Integrity	06/30/15	06/30/15			J. Johnson	R. Gregory	J. Lyon	
	M-045-91G	Provide Summary Conclusions Report of AOR for SSTs	07/28/15	07/28/15			J. Johnson	R. Gregory	J. Lyon	
	M-045-91H	Submit Change Pckg (if necessary) to est. Additional Milestones	07/31/15	07/31/15			J. Johnson	R. Gregory	J. Lyon	
M-045-91I	Provide IQRPE Certification of SSTs Structural Integrity	09/30/18	09/30/18			J. Johnson	R. Gregory	J. Lyon		
Waste Supplemental Treatment Report	M-062-40ZZ	Submit One Time Tank Waste Supplemental Treatment Tech. Report	10/31/14	N/A	N/A	Deleted on 08/12/14	S. Pfaff	C. Burrows	D. McDonald	• ORP letter 14-TF-0052, signed 05/06/14 provides discussion on ORP/ECY agreement that ORP will not submit the one-time report • Ecology provided response letter 14-NWP-110 on 05/29/14 • Milestone Deleted via TPA Chg Pckg M-62-14-01 on 08/12/14.

¹ "TPA Milestone Due Dates" are the direct regulatory drivers for completion of milestones.

² "ORP Delivery to Regulators Dates" are those dates that support future milestones, are submittal dates for permitting activities, or miscellaneous submittals that support ORP actions and represent the dates when ORP submits documents to the regulators. ORP Delivery to Regulators Dates may be earlier than TPA Milestone Due Dates if work is completed ahead of schedule.

³ The "Anticipated Regulatory Review Completion Date" is generated based on TPA Milestone Agreements and TPA Section 9.0 documentation requirements for primary documents. This date will be changed and noted in "Comments/Issues" if extension of review is requested. If the document is a secondary document or for information only, the "Anticipated Regulatory Review Completion Date" may be listed as "N/A" for not applicable.

⁴ "Final Completion Date" is entered after the document is reviewed, comments are incorporated, and any disputes are resolved. Any comment resolution issues or disputes will be noted under "Comments/Issues."

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WORKING ORP Key Documents List – August 2014

Milestone Title	Milestone Tie	Document	TPA Milestone Due Date (if applicable) ¹	ORP Delivery to Regulators Date ²	Anticipated Regulatory Review Completion Date ³	Final Completion Date ⁴	DOE-ORP Lead	Contractor Lead	Ecology Lead	Comments/Issues
Complete final design and submit RCRA Part B Permit Modification Request	M-062-31-T01	RCRA Part B Permit Modification--Final Design	04/30/16	04/30/16			S. Pfaff		D. McDonald	

Topic Areas	Document	ORP Delivery to Regulators Date ¹	Anticipated Regulatory Review Completion Date ²	Final Completion Date ³	DOE-ORP Lead	Contractor Lead	Regulator Lead	Comments/Issues
PERMIT DOCUMENTS	Tier 1 Framework Closure Plan Update	09/30/15			C. Kemp	S. Eberlein	J. Lyon	<ul style="list-style-type: none"> Tier 1, 2, 3 Submittal is associated with M-045-82, due 09/30/2015. This MS was reported as To Be Missed in the March 2013 TPA PMM. Discussions ongoing at the PM level.
	Tier 2 WMA-C Closure Plan	TBD			C. Kemp	S. Eberlein	J. Lyon	
	All Remaining Closure Plans for WMA-C	09/30/15			C. Kemp	S. Eberlein	J. Lyon	
	WMA-C Closure Conceptual Design	TBD			C. Kemp	S. Eberlein	J. Lyon	
	Tier 3 Closure Plans for Tanks Already Received	TBD			C. Kemp	S. Eberlein	J. Lyon	<ul style="list-style-type: none"> Due 180-day post EIS
	Tier 3 Closure Plans for Additional Tanks	09/30/15			C. Kemp	S. Eberlein	J. Lyon	<ul style="list-style-type: none"> Several Dates in out years
	WMA-C Closure Design	TBD			C. Kemp	S. Eberlein	J. Lyon	<ul style="list-style-type: none"> Final dates not yet determined; provides basis for the Tier 2 Closure Plan
	Supplemental Treatment Technology Notice of Construction	TBD			L. Huffman		J. Lyon	
	Submit Part B Permit Application for Selected Supplemental Treatment Technology	TBD			L. Huffman		J. Lyon	
	Submit Wiped Film Evaporator Class 3 Permit Modification or Part B Permit Application	TBD			L. Huffman		J. Lyon	
OTHER DOCUMENTS	IDF Performance Assessment (ORP/WRPS has support role to RL/CHPRC)	TBD			T. Fletcher		J. Lyon	
	Submit Categorical TOC HIA	TBD					J. Lyon	
	Temporary Waste Transfer Line Management Program Plan (also known as Hose-In-Hose Transfer Lines (HIHTL) Management Plan), RPP-12711	TBD			C. Kemp		J. Alzheimer	<ul style="list-style-type: none"> To be made into a TPA Primary Document with submittal of revision 7 per a TPA Project Managers Agreement, signed 01/22/2013
	Single-Shell Tank System Leak Detection and Monitoring Functions and Requirements Document, RPP-9937	TBD			J. Johnson		J. Alzheimer	<ul style="list-style-type: none"> Discussions are underway for a number of revisions to this document
WMA Quarterly Groundwater Reports	Ongoing Quarterly			D. Hildebrand		J. Lyon	<ul style="list-style-type: none"> Ecology SST counterparts have been added to this distribution list as of March 2013 ORP continues to provide reports to Ecology 	

AOR = Analysis of Record
 DOE = U.S. Department of Energy.
 Ecology = Washington State Department of Ecology.
 EIS = environmental impact statement.
 N/A = not applicable.
 ORP = U.S. Department of Energy, Office of River Protection.
 PM = project manager.
 PMM = project manager's meeting.

RCRA = Resource Conservation and Recovery Act.
 RDR = Retrieval Data Report
 RFI/CMS = RCRA Facility Investigation/Corrective Measures Study.
 SST = single-shell tank.
 TBD = to be determined.
 TPA = Tri-Party Agreement.
 WMA-C = Waste Management Area C.
 WRPS = Washington River Protection Solutions LLC.

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Tri-Party Agreement Interagency Management Integration Team

8-19-14

<u>Name</u>	<u>Organization</u>
<u>R. Price</u>	<u>MSA-TPA</u>
<u>John Price</u>	<u>Ecology</u>
<u>Dave Einar</u>	<u>EPA</u>
<u>JAMES Lynch</u>	<u>DOE-ORP</u>
<u>Michael Cline</u>	<u>DOE-RL</u>
<u>Brian Chastanary</u>	<u>DOE-RL</u>
<u>Chris Key</u>	<u>DOE-ORP</u>
<u>JV Boyles</u>	<u>CHPRC</u>
<u>Cheryl Whalen</u>	<u>Ecology</u>
<u>Nina Menard</u>	<u>ECY</u>
<u>Walter Johnson</u>	<u>MSA</u>
<u>R Douglas Helbrecht</u>	<u>DOE-RL</u>
<u>Kim WELSH</u>	<u>ECOLOGY</u>
<u>Julie Robertson</u>	<u>Freestone</u>
<u>Bryan Trinberger</u>	<u>DOE-ORP</u>
<u> </u>	<u> </u>