

M-026 Land Disposal Restrictions Report Project Manager Meeting
2420 Stevens Center, Room 224
Richland, Washington
February 22, 2018, 10:30 a.m.

Meeting Minutes – Approval

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated meeting.

Al Farabee
Al Farabee, Project Manager, DOE-RL

4/18/18
Date

Bryan Trimberger
Bryan Trimberger, TPA Lead, DOE-ORP

4/23/18
Date

Kelly Elsethagen
Kelly Elsethagen, Project Manager,
Washington State Department of Ecology

4/17/18
Date

Purpose: Discuss LDR Report related topics

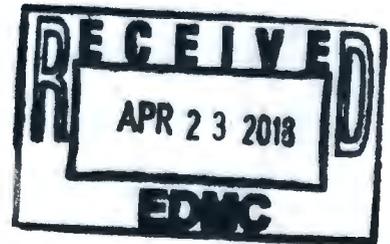
The attached minutes comprise the following:

Attachment 1 – Meeting minutes

Attachment 2 – Attendance list

Attachment 3 – Email from Kelly Elsethagen to distribution

C: Admin Record, M-026-01, M-026-01Y



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Attachment 1
Meeting Minutes

- 1) Status of previous meeting minutes:
 - a) DOE (Margo Voogd, delegated Project Manager) explained that the December 13, 2017, meeting minutes were signed and have been placed in the Administrative Record at <https://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0066784H>.
- 2) The Parties discussed the action items as follows (action item table on next page):
 - a) 171201 – Closed. The meeting was scheduled but subsequently cancelled. This action item will be removed from the PMM open action list.
 - b) 171202 – In process. Ecology (Elsethagen) indicated that discussion on this action had been initiated. DOE discussed the overlap with the Ecology-required Annual Dangerous Waste Report and the LDR Report. Ecology indicated that they would have further internal discussions. Action status will be updated at the April PMM.
 - c) 171203 – In process. Ecology (Elsethagen) indicated that Ecology had discussed the approach to storage assessments (i.e., manage through M-026 milestones, through permit, or through other activity) with Ecology Compliance staff and with EPA, but had not reached a conclusion. Action status will be updated at the April PMM.
 - d) 171204 – Closed. Ecology (Elsethagen) indicated Ecology’s preference to discuss definitions during the comment response discussions, not in project manager meetings. This item will be removed from the PMM open action list.
 - e) 171205 – Pending. Ecology (Elsethagen) explained that Ecology met with EPA and Ecology Compliance staff this week, and will hold several multi-hour workshops with them. Ecology (Elsethagen) reported targeting April 26, 2018, as the new projected date for transmittal of the EPA/Compliance-vetted RCR. In addition to the complete RCR, Ecology stated the intention to transmit to DOE the Ecology resolution of their comment response action items, specific corrections to the 2014 report where Ecology believes the data are erroneous, Ecology’s input on modifications to the 2014 report, and Ecology’s input on modifications to future reports. In addition, Ecology indicated their intent to provide a list of characterization and/or treatment TPA milestones or RCRA permit closure schedules that Ecology considers is lacking for certain waste streams..

Ecology (Elsethagen) stated that they were reopening comments if they felt the comment did not get sufficiently addressed, or if text needed to be restored. Ecology (Elsethagen) also noted a commitment to not add any new comments. DOE (Voogd) stated that for comment responses for which DOE and Ecology have identified “apparent points of departure,” DOE and Ecology may need to share their respective regulatory pathways and underlying citations to enable discussion and comment resolution.

DOE (Voogd) requested that Ecology provide with its RCR package a one-to-two-page perspective of the LDR Report’s purpose and utility at this point in time. DOE (Voogd)

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stated that DOE also would provide DOE's one-to-two-page perspective. This commitment was documented as new action item 180201.

- f) 171206 – Pending. The Parties discussed the path forward schedule for comment resolution and implications to future M-26 due dates; path forward schedule finalization is pending.
 - g) 171207 – In process. DOE (Voogd) agreed to prepare and provide to Ecology a draft letter extending the 2014 LDR Report primary document review process schedule (current schedule is completion on March 16, 2018).
- 3) Documents to be submitted to the Administrative Record:
- a) Email from K. Elsethagen to distribution (Attachment 3)
- 4) Next meeting (date and time): April 26, 2018, 11:00-11:30, 2420 STVNS/CR 126.
Time and room subject to change.

M-026 Land Disposal Restrictions Report Project Manager Meeting Action Items.

Action	Origination Date	Responsible Party	Action	Response/Closure	Status
171201	12/13/17	DOE MSA	Identify DOE and Ecology items for roundtable discussion and schedule January meeting.	January 29 roundtable cancelled pending completion of action item 171205.	Closed
171202	12/13/17	Ecology	Discuss LDR reporting requirements for wastes stored greater than 90 days but less than 1 year.	Ecology to discuss internally the nexus between ADWR and LDR reporting.	In process. Status action at April PMM.
171203	12/13/17	DOE Ecology	Discuss method/process/function for performing storage assessments (i.e., an inspection/compliance function, an M-026 or another milestone function, or 'other' function).	—	In process. Status action at April PMM.
171204	12/31/17	DOE Ecology	Establish definitions/criteria for LDR waste, potential waste, and projected waste.	Ecology indicated a preference for defining terms in conjunction with the comment resolution process, not at the PMMs.	Closed
171205	12/13/17	Ecology	Provide complete set of Ecology reviewed, EPA-vetted, DOE comment responses provided to date by end of January 2018.	Reference email from Kelly Elsethagen to Margo Voogd et. al., dated February 5, 2018 (Attachment 3). Ecology stated a goal of providing complete EPA-vetted RCR by the April 26 PMM.	Pending
171206	12/13/17	DOE Ecology	Establish path forward schedule for completing the TPA primary document review process for the CY2014 LDR Full Report.	—	Pending. Status action at April PMM.
171207	12/13/17	DOE	Draft schedule extension letter for Ecology review. The letter will include proposed schedule approach to the 2014 LDR Full Report primary document process completion and to future TPA M-026 schedule due dates.	DOE to draft letter for Ecology review.	In process
180201	02/22/18	DOE Ecology	Provide a one-to-two-page agency perspective on the LDR Report's utility and purpose at this point in time	—	Initiated

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**Attachment 2
 Attendance Roster**

Date: February 22, 2018

Name	Representing
Cardyn Norman	MSA
Bryan Trimberger	ORP
Margo Voogd	DOE-RL
Kelly Elsethagen	Ecology
John Temple	ECY
Ed Soto	Ecology
Morgan Johnson	Ecology
Daniel Houston	Ecology
Duane Carter	DOE
Thomas McDermott	DOE-PNSO
Al Farabee	DOE-RL
Wayne Toebe	CHPRC
Lana Strickling	MSA

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Attachment 3

Email Elsethagen to Distribution

From: [Elsethagen, Kelly \(ECY\)](#)
To: [Voogd, Margo J](#)
Cc: [Noonan, Carolyn P](#); [Trimberger, Bryan R](#); [Soto, Ed \(ECY\)](#); [Skinnerland, E.R \(Ron\)](#)
Subject: RE: Update on Ecology review of DOE comment responses
Date: Monday, February 5, 2018 4:58:16 PM
Attachments: [image002.png](#)

Hi Margo,

We're tentatively scheduling our internal meeting with EPA and Ecology's Compliance Team to go through the RCR on February 20th. I think we should still have the February 22nd PMM to discuss extension of the comment response schedule, and schedule for resuming workshops. If all goes well, we should be able to resume workshops early March.

Thank you,

Kelly Elsethagen

Washington State Dept. of Ecology
Nuclear Waste Program, Waste Management Section
Waste Management Project Manager
Desk: 509-372-7923
Cell: 509-424-2514

From: Voogd, Margo J [mailto:margo.voogd@rl.doe.gov]
Sent: Monday, February 5, 2018 2:28 PM
To: Elsethagen, Kelly (ECY)
Cc: Noonan, Carolyn P; Voogd, Margo J; Trimberger, Bryan R
Subject: Update on Ecology review of DOE comment responses

Hi Kelly,

For work planning purposes --
Just checking in -- any update on Ecology's review of DOE comment responses? Our manager's met (I think you were there), on January 11th, and the PMM is Feb. 22nd, so I am just attempting to complete some resource planning.

Thanks,

Margo Voogd
AM River and Plateau
Richland Operations Office
U.S. Department of Energy
Richland, Washington
(509) 376-8375
(509) 308-5187