0072630

Inter-Agency Management Integration Team (IAMIT)
Meeting Minutes
January 18, 2007

Approval: _____ Date: 3/27/07
for **J. Hedges** (H0-57)
Ecology IAMIT Representative

Approval: _____ Date: 3/15/07
M.S. McCormick (A5-11)
DOE IAMIT Representative, Chairperson

Approval: _____ Date: 3/15/07
N. Ceto (B1-46)
EPA IAMIT Representative

Minutes Prepared by:

Sonya Moore Date: 3-28-07
S.L. Moore (H8-40)
Fluor Hanford, Inc.

Ayres, J.M.	Ecology	H0-57
Bartus, D.	EPA	B1-46
Bilson, H.E.	FH	H8-20
Bohnee, G.	NPT	
Bond, R.	Ecology	H0-57
Boyd, A.	EPA	B1-46
Cameron, C.E.*	EPA	B1-46
Ceto, N.*	EPA	B1-46
Chalk, S.E.	RL	A7-75
Charboneau, B.L.	RL	A6-33
Cimon, S.	ODE	
Cusack, L.*	Ecology	H0-57
Einan, D.R.	EPA	B1-46
Engelmann, R.H.*	FH	H8-12
French, M.S.	RL	A6-38
Frey, J.A.*	RL	A5-13
Gallagher, R.G.	FH	H5-20
Harris, S.	CTUIR	
Hedges, J.*	Ecology	H0-57
Henry, D.	OOE	
Hildebrand, R.D.*	RL	A6-38
Horst, L.	OOE	
Jackson, D.E.	RL	A4-52
Jim, R.	Yakama	
Jones, M.*	Ecology	H0-57
Lobos, R.A.	EPA	B1-46
Lutz, K	HQ	A7-75
McCormick, M.S.*	RL	A5-11
Niles, K.	OOE	
Piippo, R.E.*	FH	H8-12
Post, T.C.	EPA	B1-46
Price, J.*	Ecology	H0-57
Russell, R.W.	ORP	H6-60
Skinnarland, E.R.	Ecology	H0-57
Singleton, D.G.	Ecology	H0-57
Sinton, G.L.	RL	A6-38
Thompson, K.M.	RL	A6-38
Vance, J.G.	FH	H8-12
Whalen, C.L.	Ecology	H0-57
Wiegman, S.A.*	ORP	H6-60
Wise, B.K.	FH	B3-30
Wolf, A.	CTUIR	
Administrative Record		H6-08

* Attendees

RECEIVED
MAR 30 2007
EDMC

M-091-00, Complete All Facilities for Handling TRU/TRUM

RL distributed a letter from FH outlining a Plan of Action to address the Director's Determination for the M-091-42 dispute. (*FH-0700223A R1, dated 1-19-07*) It is anticipated that extra money may be available for this work in FY 2007. FH is proposing an additional shift at WRAP for NDE/NDA work and a second shift at T-Plant for repackaging. This would amount to 3.5 TRU repack shifts and 0.5 MLLW repack shifts.

Ecology asked how much funding would be required this (fiscal) year and RL responded it was around $5.5 Million. Ecology asked how much this effort would increase the capacity and RL stated it would double the repackaging rate from about 20 drums now to 40/50 drums per week.

Another option that is being considered is to send waste (retrieved drums placed in 85-gallon overpacks) to Idaho for certification and shipment to WIPP for disposal. WIPP does not want to accept 85-gallon drums because it would be an inefficient use of repository space. Idaho is currently the only site that is allowed compacted waste to be certified to ship directly to them. If the drums are sent to Idaho for certification, it would provide a higher certification rate. Additionally a compactor is currently being installed at T-Plant specifically to compact empty 85 and/or 55 gallon drums and the possibility of using the compactor for waste that could be sent to WIPP is being evaluated.

RL's goal is to achieve a rate of certifying 1200 m^3 per year in order to get back on track to complete certification of retrieved and backlog TRU waste in storage by 2011/12; about a year after completing retrieval of CH suspect TRU. EPA noted that the perception on site is that WRAP is a low production facility and asked if there were any way to fix that. RL admitted they had problems with the glove boxes early on and that they are currently being used to repackage drums that cannot be repackaged at T Plant due to the higher radiological content in the drums. RL also noted the reliability of the NDE/NDA equipment and the TRUPACT load-out area has been very good, although having one load out bay does allow for a single point of failure. Ecology noted that this was the first good news on M-91 for some time.

Project Manager List

The approved Project Manager List is now posted on the TPA web site.

EPA noted that an economist is available in the Seattle office and is ready to review the budget. RL requested that the agencies take into account the sensitivity of the budget information and its disclosure.

RL discussed the two step budget process and expects the Integrated Planning, Accountability, and Budgeting System (IPABS) information to be available in March. Action: RL will review the budget priorities with the regulators to provide them with needed information for the FY 09 budget.

EPA is concerned about the content of the March submittal and requests their participation in its review and submittal. EPA wants to be provided with any information RL can provide for the budget review and input and how it complies with TPA commitments.

RL stated that the agencies need to be integrated on the budget process prior to the March submittal.
Action: RL will contact the regulators budget staff to outline agency integration of the budget process.

Maintenance of the Waste Information Data System (WIDS).

1/18/07 18 JAN 07

IAMIT Representative
U.S. Department of Energy
Richland Operations Office

IAMIT Representative
Environmental Protection Agency

02/02/07 1/22/07

IAMIT Representative
U.S. Department of Energy
Office of River Protection

IAMIT Representative
Washington State Department of Ecology

1.0 PURPOSE

The purpose of this procedure is to establish a mechanism for documenting the life-cycle of waste management units and other areas of concern on the Hanford Site, Richland, WA. This procedure establishes responsibilities and the process required to maintain and update waste site information contained in the Waste Information Data System (WIDS) and for updating Appendix C of the Action Plan, *Hanford Federal Facility Agreement and Consent Order,* based on the changes made in the WIDS. The Hanford Federal Facility Agreement and Consent Order is commonly known as the Tri-Party Agreement (in this procedure, the Hanford Federal Facility Agreement and Consent Order is referred to as the Tri-Party Agreement). The Tri-Party Agreement Action Plan, Section 3.5, designates WIDS as the official database for documenting the current status of each unit.

The life-cycle of a waste management unit includes initial identification and documentation of the waste site, updates to waste site information, recording waste site cleanup activities, and close-out documentation. The process supports ongoing scoping activity discussed in Section 3.5 and Section 7.2.1 of the Tri-Party Agreement Action Plan.

1.1 DEFINITIONS

Definitions with a listed source are quoted verbatim from that document. Definitions without a source are original to this procedure.

Accepted: A classification status indicating an assessment has been made that a WIDS site is a waste management unit as defined in the Tri-Party Agreement Action Plan, Section 3.1.

Accepted (Proposed): A temporary classification indicating a WIDS site has been recommended to be classified as 'Accepted', but the review process has not been completed.

Administrative Record: The administrative record is the body of documents and information that is considered or relied upon in arriving at a final decision for a remedial action, interim response action (i.e., removal action), corrective measure, interim measure, *Resource Conservation and Recovery Act* (RCRA) *of 1976* permit, or approved RCRA closure plan. (Source: Tri-Party Agreement Action Plan, Appendix A)

Areas of Concern: Any area of a Facility where a release of dangerous waste or dangerous constituents has occurred, is occurring, is suspected to have occurred, or threatens to occur (Source: Hanford Facility RCRA Permit, *Definitions*).

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund: The federal statute enacted in 1980 and reauthorized in 1986, which provides the statutory authority for cleanup of hazardous substances that could endanger public health or welfare or the environment (Source: Tri-Party Agreement Action Plan, Appendix A).

CERCLA Past Practice (CPP): A process by which a past practice unit containing hazardous substances will be addressed for response action (as opposed to RCRA past practice) (Source: Tri-Party Agreement Action Plan, Appendix A).

Classification: A process for assessing whether a WIDS site is a waste management unit as defined in the Tri-Party Agreement Action Plan, Section 3.1. The assessment is performed using the Discovery Site Evaluation Checklist (Figure 3). Classification categories include 'Discovery, Accepted, Not Accepted, and Not Accepted (Proposed)' (Table 1).

Closed Out: A reclassification status indicating, due to actions taken, a waste management unit meets applicable cleanup standards or closure requirements.

Closure Plan: A RCRA document that contains the plan to close a Treatment, Storage, and/or Disposal (TSD) unit in accordance with WAC 173-303 and the Hanford Facility RCRA Permit.

Consolidated: A reclassification status indicating a WIDS site is a duplicate of, physically located within, or adjacent to another WIDS site and will be dispositioned as part of that other WIDS site. NOTE: A consolidated WIDS site has no future updates in WIDS after reclassification. All updates are limited to the WIDS site with which it was consolidated.

Deleted From National Priorities List (NPL): A reclassification status indicating the waste management unit is deleted from the NPL or included in a final action published in the Federal Register to delete a listing from the NPL.

Discovery: An initial classification status indicating evidence of a potential waste site; assessment not yet complete. This is the classification of a newly discovered WIDS site.

Discovery Site Evaluation Checklist: A checklist used to evaluate a WIDS site to determine its classification. The Discovery Site Evaluation Checklist (Figure 3) is based on Tri-Party Agreement Action Plan, Section 3.1, which lists six categories of waste management units.

DOE Federal Project Director: The DOE Federal Project Director is the person responsible and accountable for executing the project. This includes meeting cost, schedule and performance targets. The DOE Federal Project Director leads the project team and provides broad program guidance. A list of responsibilities for the DOE Federal Project Director is contained in DOE ORDER 413.3A Section 6.g. The DOE Federal Project Director is responsible for classification and reclassification decisions for WIDS sites; this responsibility can be delegated by letter to a DOE Project Manager (as defined in the Tri-Party Agreement Action Plan)

Engineered Controls: Method of managing environmental and health risks by placing a barrier between contamination and rest of the site, thus limiting exposure pathways. US Environmental Protection Agency (EPA), Terms of Environment: Glossary, Abbreviation and Acronyms, USEPA Web Page, http://www.epa.gov/OCEPAterms/.

Hanford Site Technical Database (HSTD): The Hanford Site Technical Database is the system used to track work scope pertaining to the Hanford cleanup. The system supports lifecycle baseline planning for the Hanford Site.

Inactive Contaminated Structures: Permanent, man-made features including buildings, concrete piers and supports, foundations and slabs, diversion boxes, control structures, tanks, flush pits, outfalls, pump stations, reactors, stacks, sumps, and valve pits that have no current or planned future use and have surfaces contaminated with hazardous substances or have hazardous substances remaining within them. Inactive contaminated structures do not include waste disposal facilities such as cribs, ponds, ditches, burial grounds, landfills, and French drains.

Institutional Controls: Intended as a broad term, institutional controls generally include non-engineered restrictions on activities and access to land, groundwater, surface water, waste sites, waste disposal areas, and other areas or media containing hazardous substances, to minimize potential for human exposure to substances. Common types of institutional controls include procedural restrictions for access, fencing, warning notices, permits, easements, deed notifications, leases and contracts, and land-use controls. (Source: DOE/RL-2001-41, *Sitewide Institutional Controls Plan for Hanford CERCLA Response Actions,* Rev. 0).

Interagency Management Integration Team (IAMIT): A committee of the Executive Managers from each agency [U.S. Department of Energy, Richland Operations Office (DOE-RL), U.S. Environmental Protection Agency (EPA), Region 10, and the Washington State Department of Ecology (Ecology)] with the functions of negotiation of new milestones, adjustment of scope and schedule of existing interim milestones, and Tri-Party Agreement Action Plan, Issue Resolution/Dispute Resolution. The IAMIT also serves as the interface with the Hanford Advisory Board (HAB). (Source: Tri-Party Agreement, Article VIII).

Interim Closed Out: A reclassification status indicating, due to actions taken, a waste management unit meets cleanup standards specified in an Interim Action Record of Decision or Action Memorandum, but for which a Final Record of Decision has not been issued.

Lead Regulatory Agency: The agency (EPA or Ecology) which is assigned regulatory oversight responsibility with respect to actions under the Tri-Party Agreement Action Plan, regarding a particular operable unit, TSD group/unit, or milestone pursuant to Section 5.6 of the Tri-Party Agreement Action

Plan. The designation of a Lead Regulatory Agency shall not change jurisdictional authorities of the parties (Source: Tri-Party Agreement Action Plan, Appendix A).

National Priorities List: EPA's list of priority waste sites containing hazardous substances that will be investigated and cleaned up under the Superfund program (Source: Tri-Party Agreement Action Plan, Appendix A).

No Action: A reclassification status indicating a waste site does not require any further remedial action under RCRA Corrective Action, CERCLA, or other cleanup standards based on an assessment of quantitative data collected for the waste site.

Not Accepted: A classification status indicating an assessment has been made that a WIDS site is not a waste management unit and is not within the scope of Tri-Party Agreement Action Plan, Section 3.1. This classification requires lead regulatory agency approval.

Not Accepted (Proposed): A temporary classification indicating a WIDS site has been recommended to be classified as 'Not Accepted', but the review process has not been completed.

Operation & Maintenance (O&M): The term means measures required to maintain the effectiveness of response action (Source: 40 CFR 300.5). For the purpose of this document, O&M activities include surveillance, maintenance, and monitoring, such as groundwater monitoring requirements. US Environmental Protection Agency, Terms of Environment: Glossary, Abbreviation sand Acronyms, USEPA Web Page, http://www.epa.gov/OCEPAterms/.

Operable Unit: A discrete portion of the Hanford Site, as identified in Section 3.3 of the Tri-Party Agreement, Action Plan. An operable unit is a group of land disposal sites placed together for the purposes of doing a Remedial Investigation/Feasibility Study (RI/FS) and subsequent cleanup actions. The primary criteria for placement of a site into an operable unit includes geographic proximity, similarity of waste characteristics and site type, and the possibility for economies of scale. (Source: Tri-Party Agreement Action Plan, Appendix A). NOTE: The term operable unit can also be applied to areas of groundwater contamination. The groundwater operable units are not within the scope of WIDS.

Other Storage Areas: Areas used to store materials not permitted under RCRA. Only those 'other storage areas' that may require action to mitigate a potential environmental impact are eligible as waste management units per the Tri-Party Agreement Action Plan.

Postclosure: A RCRA term for the care needed after the TSD unit closure plan has been implemented when there is still waste left in place.

Preliminary Assessment and Site Inspection (PA/SI): Normally, the first step in analyzing the nature and severity of contamination at a potential CERCLA site and is used to determine if a site should be nominated for the NPL. Based upon extensive documentation previously submitted to EPA by DOE, this requirement is considered to have been satisfied for the Hanford Site (Source: Tri-Party Agreement Action Plan, Appendix A).

Project Manager: The individual responsible for implementing the terms and conditions of the Tri Party Agreement at the specific operable unit level on behalf of his/her respective agency. The Project

Manager has direct responsibility for completion of targets and milestones and has authority to agree to modifications of scope and schedule, in accordance with Section 12.0 of the Tri-Party Agreement Action Plan (Source: Tri-Party Agreement Action Plan, Appendix A).

Resource Conservation and Recovery Act (RCRA): A federal law enacted in 1976 that regulates the generation, transportation, treatment, storage, and disposal of hazardous wastes (Source: Tri-Party Agreement Action Plan, Appendix A).

RCRA/CERCLA Integration: The coordination of RCRA corrective action and RCRA TSD unit closure with CERCLA remedial actions.

RCRA Facility Assessment (RFA): The initial RCRA process to determine whether corrective action for a RCRA past practice unit (waste management unit) is warranted, or to define what additional data must be gathered to make this determination; analogous to a CERCLA Preliminary Assessment and Site Inspection (Source: Tri-Party Agreement Action Plan, Appendix A).

RCRA Past Practice (RPP): A process by which an inactive past practice waste management unit containing hazardous wastes or hazardous constituents will be addressed for corrective action, regardless of the date waste was received or discharged at a unit. This applies only to units not subject to regulation as a TSD unit (Source: Tri-Party Agreement Action Plan, Appendix A).

Reclassification: The process whereby the status of an accepted waste management unit is changed in WIDS. Reclassification occurs when sufficient data have been received to disposition the unit. Reclassification categories are 'Rejected, No Action, Closed Out, Interim Closed Out, Consolidated, or Deleted from NPL' (Table 2). Reclassification could require regulatory agency review and concurrence. Reclassification overrides the classification status of the waste management unit.

Reclassification Initiator: A person who initiates the reclassification process for a waste management unit.

Rejected: A reclassification status indicating a waste site does not require remediation under RCRA Corrective Action, CERCLA, or other cleanup standards based on qualitative information such as a review of historical records, photographs, drawings, walkdowns, ground penetrating radar scans, and shallow test pits. Such investigations do not include quantitative measurements.

Solid Waste Management Unit (SWMU): Any discernible location at the Facility where solid wastes have been placed at any time, irrespective of whether the location was intended for the management of solid or dangerous waste, and includes any area at the Facility at which solid wastes have been routinely and systematically released (for example through spills), and includes dangerous waste treatment, storage, and disposal units (Source: Hanford Facility RCRA Permit, WA 7890008967).

Source, Special Nuclear, or Byproduct Material: The term 'source material' means uranium or thorium. The term 'special nuclear material' means plutonium, or uranium enriched in the isotope 233 or in the isotope 235. The term 'byproduct material' means any radioactive material yielded in or made radioactive by exposure to the radiation incident in the process of producing or utilizing special nuclear material (Source: 42 USC, Section 2014, Chapter 23, Development and Control of Atomic Energy).

Treatment, Storage, or Disposal (TSD) Group: A grouping of TSD units for the purpose of preparing and submitting a permit application and/or closure plan pursuant to the requirements under RCRA, as determined in the Tri-Party Agreement Action Plan (Source: Tri-Party Agreement Action Plan, Appendix A).

Treatment, Storage, or Disposal (TSD) Unit: A unit used for treatment, storage, or disposal of hazardous waste and is required to be permitted and/or closed pursuant to RCRA requirements as determined in the Tri-Party Agreement Action Plan (Source: Tri-Party Agreement Action Plan, Appendix A).

Unit Type/Unit Category: A category determining the process by which a waste management unit is addressed for corrective action and/or closure (Examples include CPP; RPP; TSD).

Waste Disposal Unit: Units either permitted for disposal of dangerous waste or other units used for disposal including burial grounds, pits, ponds, ditches, cribs, trenches, French drains, or land surface units that might require action to mitigate a potential environmental impact.

Waste Management Area: An area comprised of several waste sites that are generally within or immediately adjacent to a tank farm. Sites within a waste management area that meet the definition to be considered part of a TSD or a RCRA Past Practices site are grouped within the waste management area for the purposes of performing a RCRA Closure or Corrective Action, as appropriate. The primary criteria for placement of a site into a waste management area is to facilitate closure and remedial actions of sites that are in close geographic proximity to each other, have similar waste characteristics and can be closed under a common regulatory process. By organizing waste sites within a waste management area opportunities for economies of scale can be achieved in the closure process.

Waste Management Unit: Any location within the boundary of the Hanford Site that may require action to mitigate a potential environmental impact. Tri-Party Agreement Action Plan, Section 3.1, identifies six categories of waste management units: solid waste management units as specified under Section 3004(u) of RCRA, waste disposal units (including RCRA disposal units), unplanned release units (including those resulting from spills), inactive contaminated structures, RCRA treatment and storage units, and other storage areas.

Waste Management Unit Report: A report is required by the Tri-Party Agreement Action Plan, Section 3.5. The report is generated in January of each year and posted electronically for regulator and public access. The report reflects all changes made in waste management unit status during the previous year.

Waste Site: A waste management unit. For the purposes of this procedure, the terms 'waste site' and 'waste management unit' are synonymous.

Waste Site Controls: The term means controls or restrictions placed on a waste site after removal or remediation actions are pending or complete. The controls include engineering controls, institutional controls, monitoring requirements, surveillance & maintenance (S&M) requirements, and operation and maintenance (O&M) requirements.

WIDS: WIDS is the electronic database of waste site information for the Hanford Site (Source: Tri-Party Agreement Action Plan, Section 3.5). The WIDS also includes hardcopy record files maintained for each site listed in the database.

WIDS Administrator: Individual responsible for the maintenance and management of WIDS.

WIDS Investigator: A member of the WIDS staff qualified to perform WIDS site investigations, compile information concerning WIDS sites, enter information into the database, and prepare the Discovery Site Evaluation Checklist.

WIDS Regulatory Concurrence Reviewer: An environmental regulatory subject matter expert, selected by the WIDS Administrator, that reviews and concurs with the Discovery Site Evaluation Checklist and provides additional regulatory support for the WIDS when needed. This subject matter expert is cognizant in CERCLA, RCRA and other applicable regulations.

WIDS Site: Any listing in the WIDS regardless of classification or reclassification status.

2.0 SCOPE

This procedure defines the 'WIDS change control system' as required by the Tri-Party Agreement Action Plan, Section 3.5. The WIDS identifies waste management units on the Hanford Site and summarizes information associated with each unit. In addition, the WIDS also documents areas of concern evaluated and determined not to be waste management units. These units are not deleted, but are kept in the WIDS to document institutional memory. The WIDS does not document <90 day storage areas and satellite accumulation areas; these areas are maintained on a separate list as documented in the Operating Record per Condition II.I.1.a of the Hanford Facility RCRA Permit.

3.0 RESPONSIBILITIES

This section describes responsibilities for organizations and personnel identified in this procedure. Responsibilities for some personnel are identified in Section 1.1 and are not repeated in this section.

3.1 ALL HANFORD SITE CONTRACTORS AND PERSONNEL

The DOE shall require all Hanford Site contractors to notify the WIDS Administrator concerning new potential WIDS sites and new information concerning existing WIDS sites. Notifications can be through the WIDS hotline at 375-WIDS, an E-Mail message to ^WIDS Investigation Team, or submitted via plant mail to WIDS at MSIN A0-21. Non-Hanford Site personnel can either call the WIDS hotline or notify DOE of new potential WIDS sites or new information concerning existing WIDS sites. Notification of WIDS site changes also can be submitted to WIDS by providing documents, such as field investigation, characterization, or remediation reports, to the WIDS Administrator.

3.2 TRI-PARTY MEMBERS

The U.S. Department of Energy Office of Richland Operations Office (DOE-RL), U.S. Department of Energy Office of River Protection (DOE-ORP), Environmental Protection Agency (EPA), and/or the Washington State Department of Ecology (Ecology) are responsible for reviewing the waste site classification and reclassification forms and responding appropriately as required by this procedure.

3.3 WIDS ADMINISTRATOR

The WIDS Administrator is responsible for ensuring the WIDS is properly maintained. This is achieved by establishing internal procedures for accepting information concerning new WIDS sites and updates to existing WIDS sites, and for ensuring changes to the database are complete, accurate, and within the established database criteria. The internal procedures shall require that all information be traceable to a referenced source. Hardcopy data files for each WIDS site will be maintained in a secured location.

The WIDS Administrator is also responsible for ensuring the waste management report, as required by Tri-Party Agreement Action Plan, Section 3.5, is generated in January of each year and posted electronically for regulator and public access.

4.0 REQUIREMENTS

This section describes requirements related to this procedure that are contained in the Tri-Party Agreement Action Plan and the Hanford Facility RCRA Permit.

4.1 NOTIFICATION

Permit Condition II.Y.3.b of the Dangerous Waste portion of the Hanford Facility RCRA Permit states:

"Newly Identified Solid Waste Management Units and Newly Identified Releases of Dangerous Waste or Dangerous Constituents. The Permittee must notify Ecology of all newly-identified solid waste management units and all newly-identified areas of concern at the Facility. For purposes of this condition, a 'newly-identified' solid waste management unit or a 'newly-identified' area of concern is a unit or area not identified in the FFACO, as amended, on the effective date of this condition and not identified by Condition II.Y.3.a. Notification to Ecology must be in writing and must include, for each newly-identified unit or area, the information required by WAC 173-303-806(4)(a)(xxiii) and WAC 173-303-806(4)(a)(xxiv). Notification to Ecology must occur at least once every calendar year, in January, and must include all units and areas newly identified since the last notification, except that if a newly identified unit or area may present an imminent and substantial endangerment to human health or the environment, notification must occur within five (5) days of identification of the unit or area. If information required by WAC 173-303-806(4)(a)(xxiii) or WAC 173-303-806(4)(a)(xxiv) is already included in the Waste Information Data System, it may be incorporated by reference into the required notification."

The Tri-Party Agreement Action Plan, Section 3.5, addresses notification of new WIDS sites by establishing the WIDS database as the official system to identify all Hanford Site waste management units.

4.2 DATA ACCESS

The Tri-Party Agreement Action Plan, Section 9.6.2, requires Ecology and EPA be granted access to all data that is relevant to work performed, or to be performed, under the agreement. DOE/RL-93-69, *Tri-Party Agreement Databases, Access Mechanism and Procedures*, describes the method for regulators to obtain access to the database.

4.3 SCOPING ACTIVITIES

Article XIV, Paragraph 49, of the Tri-Party Agreement sets the requirement for a RCRA Facility Assessment (RFA). The RFA process is analogous to the Preliminary Assessment/Site Investigation (PA/SI) stage of the CERCLA program [40 Code of Federal Regulations (CFR) 300.420]. The RFA and PA/SI identify solid waste management units requiring further action and eliminating solid waste management units, environmental media, or entire facilities from further consideration when it is determined there is no evidence of a release or likelihood of a release posing a threat to human health and the environment.

Section 7.2.1 of the Tri-Party Agreement Action Plan, addresses sitewide scoping activities. The RFA & PA/SI processes have been completed for the Hanford Site, although continuing activities could lead to the discovery of additional WIDS sites or new information impacting either the designation of individual units within operable units or the priority in which operable units are managed. Section 7.2.1 refers to WIDS as the primary vehicle to document this ongoing activity. The waste site evaluation process and waste site reclassification are documented in WIDS.

5.0 PROCEDURE

This section describes procedural steps for adding, updating, classifying and reclassifying sites documented in the WIDS. Figure 1 shows the progression of WIDS sites through the decision process and the classification and reclassification results.

5.1 IDENTIFICATION OF A NEW WIDS SITE OR NEW INFORMATION

Anyone that has discovered a potential new WIDS site or has discovered new information about an existing WIDS site should submit the information to the WIDS Administrator.

Originator	1. Submits new information to the WIDS Administrator. A form is provided to facilitate preparation of the submittal (Figure 2).
WIDS Administrator	2. Receives and evaluates new information to determine whether the site is already documented in the WIDS.
	3. If the information is not associated with any sites existing in the WIDS, go to Section 5.1.1.

4. If the information is determined to be related to an existing WIDS site, go to Section 5.1.2.

5.1.1 ADDING A NEW WIDS SITE

WIDS Administrator

1. Adds the site as a new entry to the database. Assigns a unique name to the WIDS site. Sets the site classification to Discovery.
2. Assigns the WIDS site to an investigator.

WIDS Investigator

3. Researches and documents the WIDS site following the internal WIDS procedures.
4. Notifies the originator that the site has been added to WIDS. Also notifies the facility owner, remediation project lead, and/or any other appropriate personnel whose work scope might be affected by the new site. Go to Section 5.1.3.

5.1.2 UPDATING AN EXISTING WIDS SITE

WIDS Administrator

1. Assigns the WIDS site to an investigator.

WIDS Investigator

2. Updates the WIDS following the internal WIDS procedures.
3. Notifies the originator that the WIDS site has been updated. Also notifies the contractor assigned responsibility for managing the WIDS site.
4. Reviews the Discovery Site Evaluation Checklist to see if any changes are needed.
5. If changes to the checklist are identified, go to Section 5.1.3.
6. If there are no changes to the checklist, this completes the updating process.

5.1.3 CLASSIFICATION OF WASTE SITES

Table 1 provides a list of classification statuses and definitions.

WIDS Investigator

1. Prepares and signs the Discovery Site Evaluation Checklist.
2. Submits the checklist to the WIDS Regulatory Compliance Reviewer.

WIDS Regulatory Compliance Reviewer	3. Reviews the checklist.
	4. If the reviewer concurs with the checklist, the checklist shall be signed and submitted to the WIDS Administrator. Go to step #6.
	5. If the reviewer disagrees with the checklist, the checklist shall be returned to the WIDS Investigator with recommended changes marked on the form. Return to step #1.
WIDS Administrator	6. WIDS sites determined to be a 'Waste Management Unit' are classified in WIDS as 'Accepted (Proposed)'. Go to step #8
	7. WIDS sites determined to be 'Not a Waste Management Unit' are classified in WIDS as 'Not Accepted (Proposed)'.
	8. Submits the checklist and supporting information to the DOE Federal Project Director for approval.
DOE Federal Project Director and Lead Regulatory Agency Project Manager(s)	9. Meet to review the checklist. If the lead regulatory agency is not clear based on geographic location or type of WIDS site, both EPA and Ecology shall participate.
	10. Review the checklist and supporting information.
	11. If all participants concur with the checklist, the checklist shall be signed. Go to #14
	12. If all participants disagree with the checklist, they shall mark corrections on the checklist and write "Not Approved" in the signature blocks. Go to #20.
	13. If all participants cannot reach agreement, the checklist will be considered in dispute and will be elevated to the IAMIT. Go to Section 5.3, step #5.
	14. If the approved checklist indicates the WIDS site is a Waste Management Unit, assigns the WIDS site to an Operable Unit and identifies the Unit Category (see Table 3). Write the Operable Unit and Unit Category in the comment space on the checklist.

DOE Federal Project Director	15. If the approved checklist indicates the WIDS site is a Waste Management Unit, assigns the site to a contractor and directs the Hanford Site Technical Database (HSTD) administrator to add the site to the project baseline.
DOE Federal Project Director	16. Submits the approved checklist and supporting information to the WIDS Administrator.
WIDS Administrator	17. If the approved checklist indicates the WIDS site is a Waste Management Unit, sets the classification to 'Accepted'. Set the Operable Unit and Unit Category to match the written comments on the checklist. Go to #19
	18. If the approved checklist indicates the WIDS site is Not a Waste Management Unit, sets the classification to 'Not Accepted'.
	19. Submits a copy of the checklist to the Administrative Record. This completes the classification process.
DOE Federal Project Director	20. Submits not approved checklist and supporting information to the WIDS Administrator.
WIDS Administrator	21. Returns the checklist to the WIDS Investigator. Go to Section 5.1.3, step #1.

5.2 RECLASSIFICATION

Accepted waste sites can be reclassified to Rejected, No Action, Closed Out, Interim Closed Out, Consolidated, or Deleted from NPL. Table 2 provides a list of reclassification statuses and definitions.

This procedure contains a very formal process for obtaining review and approval of Reclassification Forms that involves transmitting the forms by letter. At their discretion, the Federal Project Director and Project Managers can choose to use a different review process such as a review meeting or to hand off the forms without a letter. However, the 60 day review period is only valid if the reclassification forms are transmitted by letter.

5.2.1 RECLASSIFICATION TO 'REJECTED' OR 'NO ACTION'

Reclassification Initiator	1. Obtains permission from the contractor responsible for the waste site to initiate reclassification.
	2. Obtains a Waste Site Reclassification Form control number from the WIDS Administrator.

3. Prepares a reclassification form (Figure 4) and attaches appropriate supporting documentation. The form shall list waste site controls including specific institutional controls, engineered controls, or monitoring requirements needed for the waste site (refer to the specific Record of Decision or other relevant documents).

4. Submits a copy of the reclassification form to the responsible contractor for review. Incorporates comments.

5. Submits the reclassification form and supporting documentation to the DOE Federal Project Director.

DOE Federal Project Director

6. Reviews the reclassification form and supporting information.

7. If the DOE Federal Project Director concurs with reclassification, the form shall be signed. Go to step #10.

8. If the DOE Federal Project Director disagrees with the reclassification, he or she shall write 'Not Approved' in the DOE signature block.

9. Returns the form and supporting information to the Reclassification Initiator with a copy sent to the WIDS Administrator. Go to step #21.

10. Transmits the reclassification form and supporting information by letter to the Lead Regulatory Agency Project Manager with a copy sent to the WIDS Administrator.

Lead Regulatory Agency Project Manager

11. The Lead Regulatory Agency Project Manager has 60 calendar days to review the information.

12. If the Lead Regulatory Agency Project Manager agrees with the reclassification, he or she shall sign in the appropriate signature block and return the form and supporting information to the DOE Federal Project Director by the end of the 60 calendar day review period. Go to step #15.

13. If Lead Regulatory Agency Project Manager disagrees with the proposed reclassification, he or she shall write 'Not Approved' in the appropriate signature block. The form, supporting information, and a written response justifying the decision must be transmitted via letter to the DOE Federal Project Director by the end of the 60 calendar day review period. Go to step #19.

14. If the Lead Regulatory Agency Project Manager does not respond within 60 days, the reclassification will be considered in dispute. Go to section 5.3.

DOE Federal Project Director

15. Submits the approved reclassification form and supporting information to the WIDS Administrator with a copy to the Reclassification Initiator.

WIDS Administrator

16. Sets the reclassification status of the waste site to 'Rejected' or 'No Action' as appropriate. Sets the status of Waste Site Reclassification Form to 'Approved'.

17. Ensures that the waste site controls listed on the reclassification form are documented in appropriate data fields within the WIDS.

18. Ensures a copy of the approved reclassification form and supporting information has been submitted to the Administrative Record. This completes the reclassification process.

DOE Federal Project Director

19. If the DOE Federal Project Director agrees with the justification, he or she shall submit the form and the written response from the Lead Regulatory Agency Project Manager to the WIDS Administrator with copy to the Reclassification Initiator. Go to step #21.

20. If the DOE Federal Project Director disagrees with the justification, he or she shall initiate dispute resolution. Go to section 5.3.

WIDS Administrator

21. Sets the status of the Waste Site Reclassification Form to 'Not Approved'. This completes the reclassification process.

5.2.2 RECLASSIFICATION TO 'CLOSED OUT' OR 'INTERIM CLOSED OUT'

Reclassification Initiator

1. Reviews Table 3 to identify the specific closure requirements for the waste site based on its Unit Category.

2. Obtains a Waste Site Reclassification Form control number from the WIDS Administrator.

3. Prepares a reclassification form (Figure 4) and attaches appropriate supporting documentation. The form shall indicate how the waste site meets the necessary closure requirements. The form shall list waste site controls including specific institutional controls, engineered controls or monitoring requirements needed for the waste site (refer to the specific Record of Decision, TSD Closure Letter, or other relevant documents).

   If the form does not require a signature from the Lead Regulatory Agency due to either its Unit Category or already existing documentation (e.g., a signed TSD closure letter from Ecology) indicate this on the form.

4. Submits the reclassification form and supporting documentation to the DOE Federal Project Director.

DOE Federal Project Director

5. Reviews the reclassification form and supporting information.

6. If the DOE Federal Project Director concurs with reclassification, the form shall be signed. Go to step #10.

7. If the DOE Federal Project Director disagrees with the reclassification, he or she shall write 'Not Approved' in the DOE signature block.

8. Returns the form and supporting information to the Reclassification Initiator with a copy sent to the WIDS Administrator. Go to step #21.

9. If the reclassification form requires a signature from the Lead Regulatory Agency Project Manager, transmits the reclassification form and supporting information by letter to the Lead Regulatory Agency Project Manager with a copy sent to the WIDS Administrator. Go to step #11.

10. If the reclassification form does not require a signature from the Lead Regulatory Agency Project Manager, go to step #16.

Lead Regulatory Agency Project Manager

11. The Lead Regulatory Agency Project Manager has 60 calendar days to review the information.

12. If the Lead Regulatory Agency Project Manager agrees with the reclassification, he or she shall sign in the appropriate signature block and return the form and supporting information to the DOE Federal Project Director by the end of the 60 calendar day review period. Go to step #15.

13. If the Lead Regulatory Agency Project Manager disagrees with proposed reclassification, he or she shall write 'Not Approved' in the appropriate signature block. The form, supporting information, and a written response justifying the decision must be transmitted via letter to the DOE Federal Project Director by the end of the 60 calendar day review period. Go to step #19.

14. If the Lead Regulatory Agency Project Manager does not respond within 60 days, the reclassification will be considered in dispute. Go to section 5.3.

DOE Federal Project Director

15. Submits the approved reclassification form and supporting information to the WIDS Administrator with a copy to the Reclassification Initiator.

WIDS Administrator

16. Sets the reclassification status of the waste site to 'Closed Out' or 'Interim Closed Out' as appropriate. Sets the status of the Waste Site Reclassification Form to 'Approved'.

17. Ensures that the waste site controls listed on the reclassification form are documented in appropriate data fields within the WIDS.

18. Ensures a copy of the approved reclassification form and supporting information has been submitted to the Administrative Record. This completes the reclassification process.

DOE Federal Project Director

19. If the DOE Federal Project Director agrees with the justification, he or she shall submit the form and the written response from the Lead Regulatory Agency Project Manager to the WIDS Administrator with a copy to the Reclassification Initiator. Go to step #21.

20. If the DOE Federal Project Director disagrees with the justification, he or she shall initiate dispute resolution. Go to section 5.3.

WIDS Administrator

21. Sets the status of the Waste Site Reclassification Form to 'Not Approved'. This completes the reclassification process.

5.2.3 RECLASSIFICATION TO 'CONSOLIDATED'

Consolidation of waste sites involves combining or regrouping waste sites to facilitate recordkeeping, waste site management, cleanup planning, and remediation. Consolidated waste sites can include duplicated sites, sites within the boundary of a larger site, or those within the side slope of the excavation needed to remediate a site (requiring concurrent cleanup actions).

Reclassification Initiator	1. Obtains permission from the contractor(s) responsible for both waste sites to initiate reclassification.
Reclassification Initiator	2. Obtains a Waste Site Reclassification Form control number from the WIDS Administrator.
	3. Prepares a reclassification form (Figure 4) and attaches appropriate supporting documentation for both the waste site to be consolidated and the waste site it is being consolidated into.
	4. Submits a copy of the reclassification form to the responsible contractor for review. Incorporates comments.
	5. Submits the reclassification form and supporting documentation to the DOE Federal Project Director.
DOE Federal Project Director	6. Reviews the reclassification form and supporting information.
	7. If the DOE Federal Project Director concurs with reclassification, the form shall be signed. Go to step #10.
	8. If the DOE Federal Project Director disagrees with the reclassification, he or she shall write 'Not Approved' in the DOE signature block.
	9. Returns the form and supporting information to the Reclassification Initiator with a copy sent to the WIDS Administrator. Go to step #20.
	10. Transmits the reclassification form and supporting information to the Lead Regulatory Agency Project Manager by letter with a copy sent to the WIDS Administrator.

Lead Regulatory Agency Project Manager	11. The Lead Regulatory Agency Project Manager has 60 calendar days to review the information.
	12. If the Lead Regulatory Agency Project Manager agrees with the reclassification, he or she shall sign in the appropriate signature block and return the form and supporting information to the DOE Federal Project Director by the end of the 60 calendar day review period. Go to step #15.
	13. If the Lead Regulatory Agency Project Manager disagrees with proposed reclassification, he or she shall write 'Not Approved' in the appropriate signature block. The form, supporting information, and a written response justifying the decision must be transmitted via letter to the DOE Federal Project Director by the end of the 60 calendar day review period. Go to step #18.
	14. If the Lead Regulatory Agency Project Manager does not respond within 60 days, the reclassification will be considered in dispute. Go to section 5.3.
DOE Federal Project Director	15. Submits the approved reclassification form and supporting information to the WIDS Administrator with a copy to the Reclassification Initiator.
WIDS Administrator	16. Sets the reclassification status of the waste site to 'Consolidated'. Sets the status of Waste Site Reclassification Form to 'Approved'.
	17. Ensures a copy of the approved reclassification form and supporting information has been submitted to the Administrative Record. This completes the reclassification process.
DOE Federal Project Director	18. If the DOE Federal Project Director agrees with the justification, he or she shall submit the form and the written response from the Lead Regulatory Agency Project Manager to the WIDS Administrator with a copy to the Reclassification Initiator. Go to step #20.
	19. If the DOE Federal Project Director disagrees with the justification, he or she shall initiate dispute resolution. Go to section 5.3.
WIDS Administrator	20. Sets the status of the Waste Site Reclassification Form to 'Not Approved'. This completes the reclassification process.

5.2.4 RECLASSIFICATION TO 'RCRA POSTCLOSURE'

RCRA postclosure of TSD units involves the care needed, including institutional controls and monitoring, of closed TSD units that continue to have waste in place.

Reclassification Initiator

1. Obtains a Waste Site Reclassification Form control number from the WIDS Administrator.
2. Prepares a reclassification form (Figure 4) and attaches appropriate supporting documentation indicating RCRA postclosure has begun.
3. Submits the reclassification form and supporting documentation to the DOE Federal Project Director.

DOE Federal Project Director

4. Reviews the reclassification form and supporting information.
5. If the DOE Federal Project Director concurs with reclassification, the form shall be signed. Go to step #8.
6. If the DOE Federal Project Director disagrees with the reclassification, he or she shall write 'Not Approved' in the DOE signature block.
7. Returns the form and supporting information to the Reclassification Initiator with a copy sent to the WIDS Administrator. Go to step #18.
8. Transmits the reclassification form and supporting information to the Lead Regulatory Agency Project Manager by letter with a copy sent to the WIDS Administrator.

Lead Regulatory Agency Project Manager

9. The Lead Regulatory Agency Project Manager has 60 calendar days to review the information.
10. If the Lead Regulatory Agency Project Manager agrees with the reclassification, he or she shall sign in the appropriate signature block and return the form and supporting information to the DOE Project Federal Project Director by the end of the 60 calendar day review period. Go to step #13.

	11. If Lead Regulatory Agency Project Manager disagrees with proposed reclassification, he or she shall write 'Not Approved' in the appropriate signature block. The form, supporting information, and a written response justifying the decision must be transmitted via letter to the DOE Federal Project Director by the end of the 60 calendar day review period. Go to step #16.
	12. If the Lead Regulatory Agency Project Manager does not respond within 60 days, the reclassification will be considered in dispute. Go to section 5.3.
DOE Federal Project Director	13. Submits the approved reclassification form and supporting information to the WIDS Administrator with a copy to the Reclassification Initiator.
WIDS Administrator	14. Sets the reclassification status of the waste site to 'RCRA Postclosure'. Sets the status of the Waste Site Reclassification Form to 'Approved'.
	15. Ensures a copy of the approved reclassification form and supporting information has been submitted to the Administrative Record. This completes the reclassification process.
DOE Federal Project Director	16. If the DOE Federal Project Director agrees with the justification, he or she shall submit the form and the written response from the Lead Regulatory Agency Project Manager to the WIDS Administrator with a copy to the Reclassification Initiator. Go to step #18.
	17. If the DOE Federal Project Director disagrees with the justification, he or she shall initiate dispute resolution. Go to section 5.3.
WIDS Administrator	18. Sets the status of the Waste Site Reclassification Form to 'Not Approved'. This completes the reclassification process.

5.2.5 RECLASSIFICATION TO 'DELETED FROM NPL'

When all CERCLA cleanup is completed within a portion of a NPL site per 40 CFR 300.425(e), the portion could qualify for deletion from the NPL. A portion of the site is deleted from the NPL when the portion is included in a final action published in the Federal Register.

EPA Project Manager	1. Submits a copy of a final notice of deletion or a final notice of intent to delete a portion of a NPL site as published in the Federal Register to the WIDS Administrator.

WIDS Administrator	2. Changes the reclassification status for all 'No Action' and 'Closed Out' waste sites included in the deletion to 'Deleted from NPL' (No reclassification form is needed).

5.3 WIDS DISPUTE RESOLUTION

DOE Federal Project Director	1. Schedules a meeting with the Lead Regulatory Agency Project Manager.
DOE Federal Project Director and Lead Regulatory Agency Project Managers	2. Meet to discuss the disputed classification or reclassification. Meeting minutes will be taken and submitted to the Administrative Record.
	3. If a resolution can be reached on the disputed WIDS site, the form shall be signed or marked 'Not Approved' as appropriate. Go to step #7.
	4. If a resolution cannot be reached on the disputed WIDS site, the dispute will be elevated for resolution by the Inter Agency Management Integration Team (IAMIT).
IAMIT	5. Review the proposed classification or reclassification.
	6. Determine a resolution for the dispute. Sign the form, or mark it 'Not Approved' as appropriate.
DOE Federal Project Director	7. Submits the form and supporting information to the WIDS Administrator. For reclassification forms, provide a copy to Reclassification Initiator.
WIDS Administrator	8. If the form is not approved, performs following actions as appropriate: • Reviews Discovery Site Evaluation Checklist– Go to Section 5.1.3, step #21 • Reclassification to 'Rejected' or 'No Action' – Go to Section 5.2.1, step #21 • Reclassification to 'Closed Out' or 'Interim Closed Out' – Go to Section 5.2.2, step #21 • Reclassification to 'Consolidated' – Go to Section 5.2.3, step #20. • Reclassification to 'RCRA Post Closure' – Go to Section 5.2.4, step #18

9. If the form is approved, performs the following actions as appropriate:

   - Review the Discovery Site Evaluation Checklist – Go to Section 5.1.3, step #17
   - Reclassification to 'Rejected' or 'No Action' – Go to Section 5.2.1, step #16
   - Reclassification to 'Closed Out' or 'Interim Closed Out' – Go to Section 5.2.2, step #16
   - Reclassification to 'Consolidated' – Go to Section 5.2.3, step #16.
   - Reclassification to 'RCRA Post Closure' – Go to Section 5.2.4, step #14

5.4 REPORTING

This section describes the reporting requirements for the WIDS.

5.4.1 MONTHLY STATUS REPORT

The monthly status report contains general statistics for the WIDS, a tracking list for items needing review and/or approval, and any other WIDS items that the WIDS Administrator believes would be of interest to the reports audience.

WIDS Administrator

1. Prepares the status report. The report shall include the following information:

   - Summary statistics for the WIDS.
   - A list of all sites classified as 'Accepted (Proposed)' or 'Not Accepted (Proposed)' and the date submitted for review.
   - Any other useful status information.

2. Sends out the status report by E-mail to DOE Federal Project Directors, DOE Project Managers, EPA Project Managers, Ecology Project Managers, and contractor staff that are responsible for activities associated with WIDS sites.

5.4.2 HANFORD SITE WASTE MANAGEMENT UNITS REPORT

The Hanford Site Waste Management Units Report (HSWMUR) is generated annually based on the data in the WIDS, as required by the Tri-Party Agreement Action Plan, Section 3.5. Because of its size, the report is not issued as a printed document, but instead is posted on-online for regulator and public access. The report must be completed and posted on-line by January 31 of each year.

WIDS Administrator

1. Prepares the HSWMUR report.
2. Obtains clearance to release the document.
3. Provides an electronic copy of the report to the Web Master to post on-line.
4. Prepares and send a notification letter to DOE stating the report has been completed and posted.
5. Prints one copy of the report and submits it to the TPA Administrative Record.

5.4.3 UPDATING APPENDIX C OF THE TRI-PARTY AGREEMENT ACTION PLAN

Appendix C of the Tri-Party Agreement Action Plan is a listing of all WIDS sites that have been or will be addressed under Section 7 of the Tri-Party Agreement Action Plan. This includes all CPP and RPP waste sites, as well as RCRA TSDs addressed under CERCLA. Appendix C contains the following information:

- Waste Management Unit Name
- Waste Management Unit Aliases
- Waste Management Unit Type
- Operable Unit
- Lead Regulatory Agency
- Unit Category

In addition, Appendix C provides a status for each waste site. For waste sites not reclassified, the status lists the decision document (e.g., Record of Decision, Action Memorandum) if one exists. For waste sites that are reclassified, the status lists the type of reclassification and date reclassification was approved.

WIDS Administrator

1. Prepares an update to Appendix C as a Tri-Party Agreement Action Plan, Change Request. The update package should include the following:
    - Tri-Party Agreement, Change Request Form
    - Revised Appendix C
    - Supporting Documentation. This documentation shall clearly call out any changes not currently documented in WIDS and that require regulator approval (e.g., changes in operable unit or unit category).
2. Submits the draft update package to all affected contractors for comment. Reviews and incorporates comments.
3. Submits Appendix C update package to DOE for review and approval through Tri-Party Agreement Action Plan, Change Control process. If changes are identified during the review and

approval process, an updated report and/or supporting documentation will be resubmitted as needed.

4. After the Appendix C update is approved by the Tri-Parties, ensure all changes requiring regulator approval are entered into the WIDS.

6.0 REFERENCES

Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. 9601 et seq.

DOE/RL-2001-41, *Sitewide Institutional Controls Plan For Hanford CERCLA Response Actions*) (July 2002)

Hanford Facility Resource Conservation and Recovery Act Permit, WA7890008967, as amended.

Hanford Federal Facility Agreement and Consent Order, 89-10, as amended.

Resource Conservation and Recovery Act of 1976, as amended, Public Law 94-580, 90 Stat. 2745, 42 U.S.C. 6901, et seq.

Washington Administrative Code 173-303, 2005, "Dangerous Waste Regulations", as amended.

Table 1. Classification Categories.

Classification Categories	Description
Discovery	An initial classification status indicating evidence of a potential waste site; assessment not yet complete. This is the classification of a newly discovered site.
Accepted	A classification status indicating an assessment has been made that a WIDS site is a waste management unit as defined in the Tri-Party Agreement Action Plan, Section 3.1.
Accepted (Proposed)	A temporary classification indicating a WIDS site has been recommended to be classified as 'Accepted', but the review process has not been completed.
Not Accepted	A classification status indicating an assessment has been made that a WIDS site is not a waste management unit and is not within the scope of Tri-Party Agreement Action Plan, Section 3.1. This classification requires lead regulatory agency review.
Not Accepted (Proposed)	A temporary classification indicating a WIDS site has been recommended to be classified as 'Not Accepted', but the review process has not been completed.

Table 2. Reclassification Categories.

Reclassification Categories	Description
Rejected	A reclassification status indicating a site does not require remediation under RCRA Corrective Action, CERCLA, or other cleanup standards based on qualitative information such as a review of historical records, photographs, drawings, walkdowns, ground penetrating radar scans, and shallow test pits. Such investigations do not include quantitative measurements.
No Action	A reclassification status indicating a site does not require any further remedial action under RCRA Corrective Action, CERCLA, or other cleanup standards based on an assessment of quantitative data collected for the site.
Closed Out	A reclassification status indicating, due to actions taken, a waste management unit meets applicable cleanup standards or closure requirements.
Interim Closed Out	A reclassification status indicating, due to actions taken, a waste management unit meets cleanup standards specified in an Interim Action Record of Decision or Action Memorandum, but for which a Final Record of Decision has not been issued.
RCRA Postclosure	A reclassification status indicating that the TSD unit has been closed with waste in place and postclosure care, including monitoring and institutional controls, is being implemented.
Consolidated	A reclassification status indicating a site is a duplicate of, physically located within, or adjacent to another WIDS site and will be dispositioned as part of that other site. NOTE: A consolidated site has no future updates in WIDS after reclassification. All updates are limited to the site with which it was consolidated.
Deleted from NPL	A reclassification status indicating waste management unit is deleted from NPL or included in a final action published in the Federal Register to delete a listing from the NPL.

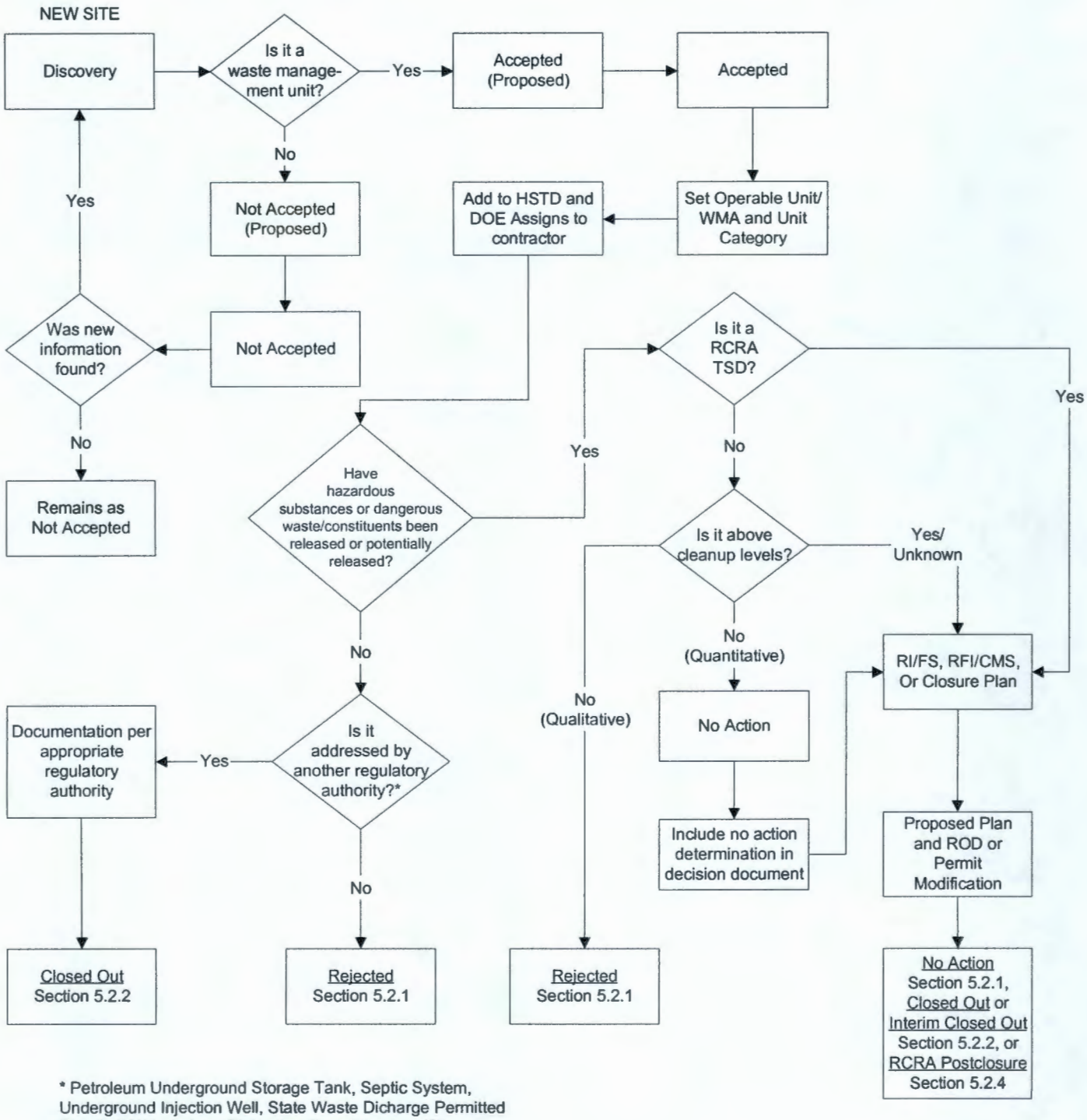
Table 3. Reclassification to Closed Out, Interim Closed Out, or RCRA Postclosure

Unit Category	Reclassification Status	Signatures Required	Documentation Required
RCRA Past Practice (RPP) or CERCLA Past Practice (CPP)	Closed Out or Interim Closed Out	DOE and Lead Regulatory Agency	Signed Waste Site Reclassification Form with appropriate closeout documentation.
RCRA Past Practice (RPP) or CERCLA Past Practice (CPP)	No Action	DOE and Lead Regulatory Agency	Signed Waste Site Reclassification Form with attached documentation supporting a No Action decision.
RCRA/CERCLA Integration (TSD)	Closed Out or Interim Closed Out	DOE, Lead Regulatory Agency and Ecology (if not Lead Regulatory Agency for the Operable Unit)	Waste Site Reclassification Form with Certification of TSD Closure Acceptance Letter signed by Ecology attached (signed letter from Ecology eliminates need for signatures on the form). The form should indicate if waste site controls are required after closure.
RCRA TSD • Clean Closure • Procedural Closure	Closed Out	DOE and Ecology	Waste Site Reclassification Form with Certification of TSD Closure Acceptance Letter or written concurrence for procedural closure signed by Ecology attached (signed letter from Ecology eliminates need for signatures on the form).
RCRA TSD • Landfill Closure	RCRA Postclosure	DOE and Ecology	Waste Site Reclassification form with attached documentation showing RCRA postclosure has begun.
Petroleum UST	Closed Out	DOE and Ecology	Waste Site Reclassification Form with attached Ecology letter documenting the WAC 173-360 requirements have been met (signed letter from Ecology eliminates need for signatures on the form)
Septic System	Closed Out	DOE	Signed Waste Site Reclassification Form documenting the WAC 246-272-18501 requirements have been met.
Injection Well/ State Waste Discharge Permitted Site	Closed Out	DOE	Signed Waste Site Reclassification Form documenting the WAC 173-216/218 requirements have been met

Table 3. Reclassification to Closed Out, Interim Closed Out, or RCRA Postclosure (Coninued)

Unit Category	Reclassification Status	Signatures Required	Documentation Required
Solid Waste Landfill	Closed Out	DOE and Lead Regulatory Agency	Signed Waste Site Reclassification Form, Certification of Closure Acceptance Letter signed by Ecology attached (signed letter from Ecology eliminates need for signatures on the form).
Inert Waste Landfill or Demolition Waste Landfill	Closed Out	DOE	Signed Waste Site Reclassification Form documenting the WAC 173-350-410 requirements have been met.
Facility	Closed Out	DOE	Signed Waste Site Reclassification Form with appropriate closeout documentation

Figure 1. Simplified Waste Site Classification/Reclassification Flow Diagram



* Petroleum Underground Storage Tank, Septic System, Underground Injection Well, State Waste Dicharge Permitted Site, Solid Waste Landfill, Inert or Demolition Landfill

Figure 2. WIDS Site Information Form (A-6003-585).

WIDS SITE INFORMATION FORM

Submitted by: _____ Telephone: _____ Date: _____

1. What is the WIDS Site Code/Name? _____ (NOT KNOWN ☐)

2. For Existing WIDS Sites: What is the new information? Describe the change (include dates, dimensions, and radiation/safety postings).

3. For documenting a New Site: What has been identified (i.e., hazardous material, radiological contamination, TSD unit, buildings)? Describe the site (include dates dimensions, and radiation/safety postings)

3a. Describe the site location. Be as specific as possible and include a location sketch.

4. Documentation attached (include any available documentation; i.e. photographs, radiation surveys, log book pages, occurrence reports, memos, or other reference documents.)

NOTE: The WIDS team reviews the information submitted. The WIDS Administrator notifies the submitter and potentially responsible organization if a new site code assigned. Future reports, memos, radiation surveys, etc. should include the new site code.

Mail to: WIDS, MSIN: A0-21 or E-mail to ^WIDS Investigation Team.

Figure 3. Discovery Site Evaluation Checklist.

To be completed by a member of WIDS Staff and included with the data package for a newly discovered potential waste management unit.

WIDS Site Code: **WIDS Site Names (Aliases):**	**Waste Management Unit** ☐ **Not a Waste Management Unit** ☐

		YES	NO
1.	Does the unit only receive uncontaminated rainwater runoff? **If 1 is YES, check NOT A WASTE MANAGEMENT UNIT above and stop.** **If 1 is NO, go to 2.**	☐	☐
A 'YES' to any of Items 2 through 7 indicates the site is a waste management unit, as defined in Section 3.1 of the Tri-Party Agreement Action Plan. (Items 2 through 7 correspond with the six waste management unit types found in the Tri Party Agreement definition.)			
2.	Complete items 2.a through 2.f. to determine if the unit is a solid waste management unit (SWMU), as specified under WAC 173 303 040.	☐	☐
2.a.	Is the material at the unit a waste (i.e., a regulated waste or a discarded material, including garbage, refuse, sludge, construction/demolition debris, industrial/sanitary wastewater or other discarded solid, liquid, semisolid, or contained gas)? **If 2.a is NO, check NO for 2 and go to 3. If 2.a is YES, go to 2.b.**	☐	☐
2.b.	Is the waste from historical residential activities (i.e., not from industrial, commercial, mining, agricultural, or community activities)?	☐	☐
2.c.	Is the unit an industrial wastewater point discharge permitted under the *Clean Water Act* (i.e., National Pollutant Discharge Elimination System permit)?	☐	☐
2.d.	Does the waste consist <u>only</u> of source, special nuclear, or byproduct material regulated by the *Atomic Energy Act*? **If 2.b, 2.c, or 2.d is YES, the site is not a SWMU. If so, check NO for 2 and go to 3. If 2.b, 2.c, and 2.d are all NO go to 2.e.**	☐	☐
2.e.	Was the waste placed in a discernable unit (i.e., a landfill, surface impoundment, land treatment unit, waste pile, tank, container storage area, incinerator, injection well, wastewater treatment unit, waste recycling unit, or other physical, chemical, or biological treatment unit)? **If 2.e is YES, check YES for 2 and go to 3. If 2.e is NO, go to 2.f.**	☐	☐
2.f.	Is the unit the result of routine and systematic discharges (i.e., areas receiving small but steady discharges over time from systematic human activity, such as from loading/unloading operations, solvent washing, industrial process sewer systems, etc.)? **If 2.f is YES, check YES for 2. If 2.f is NO, check NO for 2. Go to 3.**	☐	☐

Figure 3. Discovery Site Evaluation Checklist (Continued)

3.	Is the unit a waste disposal unit (Complete items 3a. and 3b. below)?		YES ☐ NO ☐
3.a.	Does the unit require a RCRA permit to dispose of dangerous or mixed waste?	YES ☐ NO ☐	
3.b.	Have hazardous waste or substances been disposed in a burial ground, pit, pond, ditch, crib, trench, French drain, or land surface that is not subject to regulation as a RCRA disposal unit and might require action to mitigate a potential environmental impact (e.g., radioactive waste disposal units, pre-RCRA units)?	YES ☐ NO ☐	
	If either 3.a or 3.b is YES, check YES for 3. If both are NO, check NO for 3. Go to 4.		
4.	Is the unit an unplanned release not adequately cleaned up and represents a potential threat to human health or the environment (i.e., releases above CERCLA reportable quantities defined in 40 CFR 302.4; other hazardous substance releases, including petroleum, that may require action to mitigate a potential environmental impact)?		YES ☐ NO ☐
5.	Is the unit an inactive contaminated structure?		YES ☐ NO ☐
6.	Does the unit require a RCRA permit to treat or store dangerous or mixed waste?		YES ☐ NO ☐
7.	Is the unit another type of storage unit requiring action to mitigate a potential environmental impact (e.g., radioactive waste storage unit)?		YES ☐ NO ☐
If 2, 3, 4, 5, 6, or 7 is YES, check WASTE MANAGEMENT UNIT at the top of the first page of this form. If all are NO, check NOT A WASTE MANAGEMENT UNIT at the top of the first page.			
Comments:			

WIDS Investigator (Printed)	Signature	Date
WIDS Regulatory Compliance (Printed)	Signature	Date
DOE Federal Project Director (Printed)	Signature	Date
Ecology Project Manager (Printed)	Signature	Date
EPA Project Manager (Printed)	Signature	Date

Figure 4. Waste Site Reclassification Form.

Date Submitted: _____ Originator: _____ Phone: _____	**WASTE SITE RECLASSIFICATION FORM** Operable Unit(s): _____ Waste Site Code: _____ Type of Reclassification Action: Closed Out ☐ Interim Closed Out ☐ No Action ☐ RCRA Postclosure ☐ Rejected ☐ Consolidated ☐	Control Number:

This form documents agreement among parties listed authorizing classification of the subject unit as Closed Out, Interim Closed Out, No Action, RCRA Postclosure, Rejecetd, or Consolidated. This form also authorizes backfill of the waste management unit, if appropriate, for Closed Out and Interim Closed out units. Final removal from the NPL of No Action and Closed Out waste management units will occur at a future date.

Description of current waste site condition:
(Summarize status of investigation/remediation of the waste sites.)

Basis for reclassification:
(For closeout, reference supporting documentation, as listed in Table 3.)

Waste Site Controls:
Engineered Controls: Yes ☐ No ☐ Institutional Controls: Yes ☐ No ☐ O&M requirements: Yes ☐ No ☐
If any of the Waste Site Controls are checked Yes specify control requirements including reference to the Record of Decision, TSD Closure Letter, or other relevant documents.

DOE Federal Project Director (printed)	Signature	Date
Ecology Project Manager (printed)	Signature	Date
EPA Project Manager (printed)	Signature	Date

Tri-Party Agreement

Agenda
January 18, 2007

Inter-Agency Management Integration Team Meeting
Ecology Conference Room 3A, 3100 Port of Benton Blvd., Richland

Chairperson: Matt McCormick

11:00 pm to 11:30 am

11:00 a.m.	MP-14 Agency Approval
11:05 a.m.	Project Mangers List Update
11:15 a.m	Update on M-91
11:30 a.m.	Adjourn Inter-Agency Management Integration Team Meeting

Inter-Agency Management Integration Team

January 18, 2007

Name	Organization	Mail Stop	Attachments Yes/No
R. Bippes	FH		✓
Rick Engelmann	FH	H8-12	✓
M. McCormick	DOE		No
RD Hildebrand	DOE RL		No.
CE TO	EPA		
Larry Gadbois	EPA		
Mandy Jones	Ecology		NO
John Price	Ecology		NO
Craig Cameron	EPA		No
Jeff Frey	RL		No
Steve Wiegman	DOE-ORP		