

Inter-Agency Management Integration Team Meeting Minutes November 19, 2020



SIGNATURES:

Approval: **William F. Hamel** Digitally signed by William F. Hamel
Date: 2021.01.12 11:08:40 -08'00' Date: _____
W.F. Hamel, DOE-RL IAMIT Representative

Approval: **Brian A. Harkins** Digitally signed by Brian A. Harkins
Date: 2020.12.29 06:43:44 -08'00' Date: _____
B.A. Harkins, DOE-ORP IAMIT Representative

Approval: **Price, John (ECY)** Digitally signed by Price, John (ECY)
Date: 2020.12.29 05:51:17 -08'00' Date: _____
J.B. Price, Ecology IAMIT Representative

Approval:  Digitally signed by DAVID EINAN
Date: 2020.12.17 09:10:05 -08'00' Date: _____
D.R. Einan, EPA IAMIT Representative

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1.0 WELCOME AND LOGISTICS/FORMAT

The Inter-Agency Management Integration Team (IAMIT) meetings are normally held monthly between the U.S. Department of Energy (DOE), Washington State Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA); also referred to as the Parties.

This meeting was held remotely via video and telecom utilizing the Microsoft Office Teams software, a communication and collaboration platform, due to the Hanford Site's current Phase 2 Remobilization process stemming from the COVID-19 (coronavirus) pandemic.

Mission Support Alliance, LLC (MSA) welcomed the IAMIT members and explained this was a standard IAMIT meeting that would cover the agenda items and action tracking table provided in the handout (see attachments).

2.0 REVIEW IAMIT ACTION TRACKING TABLE

2.1 Action Items

2.1.1 Agreement in Principle for the Negotiation of HFFACO Revisions in Response to Federal Fiscal Year (FFY) 2018-2020 Appropriation in Conjunction with the Representative Analogous Site Coordinating Agency Liaisons (RASCAL) Recommendations for Expediting Remedial Cleanup on the Hanford Central Plateau (or Budget/RASCAL AIP)

On August 25, 2020, the Parties signed an Agreement in Principle (AIP) for the Negotiation of Hanford Federal Facility Agreement and Consent Order (HFFACO) Revisions in Response to Federal Fiscal Year (FFY) 2018-2020 Appropriation in Conjunction with the Representative Analogous Site Coordinating Agency Liaisons (RASCAL) Recommendations (IAMIT Determination 2020-006) for Expediting Remedial Cleanup on the Hanford Central Plateau (or Budget/RASCAL AIP). The Parties are currently in negotiations and plan to conclude these negotiations by January 15, 2021 with a signed Tentative Agreement.

DOE stated the Parties are meeting and DOE is drafting an integrated schedule and costs to continue negotiations; however, negotiations are currently on a break until after the Thanksgiving holiday. The Parties have discussed the 100-F/IU Operable Units (OU) and CHPRC will be providing a presentation and proposed path forward during this meeting (see Section 3.0 below and attached presentation). DOE also mentioned the Parties have discussed how to break the waste sites apart in the 200-WA-1 OU.

EPA stated they are eager to get the integrated schedule and costs from DOE because they have been following their Superfund tracking and it would be nice to have new dates for these activities. This item will be tracked at the IAMIT level in the interim.

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2.1.2 Possible Adoption of the Principles and Parameters in Regulatory Documents

MSA reported the Principles and Parameters document (DOE/RL-2019-46) and Change Control Form F-20-01 were approved, which added the Principles and Parameters document into TPA Appendix F, “Supporting Technical Plans and Procedures” and both were added into the Hanford Administrative Record. MSA also noted the Principles and Parameters document would be revised to coincide with the TPA Five-Year review, scheduled to be completed by June 30, 2022.

EPA stated the Parties had met to discuss how they were going to revise existing work plans to reference the Principles and Parameters document in the work plan appendices.

MSA proposed closing this action, since both aforementioned documents had been approved and the Parties agreed. This item will no longer be tracked at the IAMIT level.

2.1.3 Changes/Updates to TPA Paragraphs 148/149

On July 30, 2020, the Parties approved an extension to the TPA Paragraphs 148/149 AIP, which enables negotiations to continue through January 15, 2021. The Parties held two negotiation sessions in August 2020.

At the September 17, 2020 IAMIT meeting, the Parties agreed to put these negotiations on hold until the “Hanford tank waste mission holistic negotiations” progress further. There was no update provided this month. This item will be tracked at the IAMIT level in the interim.

2.1.4 Potential Agreement in Principle to Begin Negotiations on Waste Management Area (WMA) C Closure Milestones

At the July 16, 2020 IAMIT meeting, DOE showed interest in entering into an AIP to negotiate these milestones with Ecology but wanted to discuss the potential negotiation topics and milestones further with Ecology prior to committing.

At the September 17, 2020 IAMIT meeting, the Parties indicated that DOE and Ecology met twice to discuss these milestones and DOE stated the WMA C milestones are part of the ongoing “Hanford tank waste mission holistic negotiations” between DOE and Ecology. However, Ecology requested another meeting with DOE to discuss the proposed mega barrier, which would cover WMA C after remediation.

At this IAMIT meeting, DOE stated they had met with Ecology and provided a briefing showing what a potential standalone barrier would look like. Ecology reviewed the information and responded to DOE requesting a date for the final barrier construction and a milestone (or schedule) that will be submitted for the closure plans going into the Hazardous Waste Permit. DOE also reiterated they believe there is a nexus from this action back to the holistic negotiations as it relates to TPA Appendices H and I, as these appendices are being worked by a subcommittee. Ecology responded this information was correct.

MSA asked the Parties if they would like to continue tracking this action throughout the duration of the holistic negotiations. Ecology stated their driver is the schedule to incorporate WMA-C into the Revision 8C of the Hazardous Waste Permit and wanted to continue tracking it.

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DOE agreed to continue tracking this action. This item will be tracked at the IAMIT level in the interim.

2.2 Status Updates

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

There was no update provided this month. At the October 17, 2019 IAMIT meeting, the Parties agreed revisions to Appendices H and I would be placed on hold pending the potential path forward determined from the Hanford tank waste mission holistic discussions. DOE proposed to continue tracking until discussions conclude. This item will be tracked at the IAMIT level in the interim.

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

There was no update provided this month. At the February 20, 2020 IAMIT meeting, DOE noted the proposed changes to Section 9.4 have some nexus to the M-035-09K dispute. The Parties agreed this item should be placed on hold pending the M-035-09K dispute that is with the Washington State Pollution Control Hearings Board. This item will be tracked at the IAMIT level in the interim.

2.2.3 Waste Management Area A/AX Closure Process “Kaizen”

At the September 17, 2020 IAMIT meeting, the Parties agreed to postpone the Kaizen until January 2021. The Parties also agreed that the scope of the Kaizen should be expanded to include, among other possible subjects, lessons learned from the Single Shell Tank closure process.

Ecology noted that when scheduling this Kaizen, it is always good to lock in schedules ahead of time before they fill up and asked about potential dates to conduct the Kaizen in January 2021.

MSA responded they are coordinating with the MSA Kaizen department to obtain meeting date availability and will get those dates to the Parties in the next week. MSA has the action to coordinate the logistics and provide the Parties with the proposed dates in January 2021 to conduct the Kaizen. This item will be tracked at the IAMIT level in the interim.

2.2.4 Gaps in Deactivation, Decommissioning, Decontamination and Demolition (D4) Planning

At the April 16, 2020 IAMIT meeting, DOE took the action to provide an update to the IAMIT on D4 planning efforts once the site is able to resume normal operations, pending ongoing mission essential operations due to coronavirus and pending Hanford prime contracts’ transition.

At the October 15, 2020 IAMIT meeting, EPA pointed out that it would be helpful to have a rough order of magnitude on the contaminated soil and rubble volumes to inform negotiations.

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EPA requested that DOE provide to EPA and Ecology its expectation for “level of detail” on information it would be providing prior to formal discussions beginning on D4 planning.

During this IAMIT meeting, EPA added they would like to know what kind of waste streams will be going to the Environmental Restoration Disposal Facility (ERDF) and what the overall planning is for the buildings. EPA noted as an example that the Parties had a binning meeting on the buildings surrounding the Fast Flux Test Facility (FFTF) area and believes the Environmental Impact Statement (EIS) envisioned that material going to the Integrated Disposal Facility (IDF), which is not a good use of the IDF space, especially for the general decontamination and decommissioning (D&D) related buildings.

Ecology stated that doing some strategic planning as DOE goes through contract transition will add value in coordinating the building rubble and contaminated soil to include coordinating the M-091 transuranic waste and other transuranic waste that has not been coordinated yet. Ecology added that at some point, the Parties are going to have to deal with materials management when clean material is moved around the site to do engineered barriers and this could potentially interfere with other operations. Ecology added it would be nice to have a level look at some of these issues to see how they will interact with each other.

EPA noted the outlier is the transuranic materials in the Canyon buildings and that it should be coordinated with the existing M-091 transuranic waste milestone series, by possibly adding a new milestone in the M-085 milestone series to cover the transuranic waste in the Canyon buildings.

DOE stated they are evaluating the M-091 transuranic waste and need to make sure the contractor re-evaluates the contaminated soil and building rubble. DOE took the action to evaluate the contaminated soil and building rubble strategy, ratio strategy, and integration with the M-091 transuranic waste to coincide with the entire shipping sequence, with respect to the inventory. This item will be tracked at the IAMIT level in the interim.

2.2.5 Calendar Year 2021 Tri-Party Agreement Quarterly Milestone Review and IAMIT Meeting Schedule

MSA stated the draft Calendar Year 2021 TPA Quarterly Milestone Review and IAMIT Meeting Schedule was provided to the Parties for review on October 29, 2020. The Parties all stated they had reviewed the schedule, had no conflicts, and approved the schedule during the meeting. This item is considered closed and will no longer be tracked at the IAMIT level.

3.0 PRESENTATION ON PROPOSAL FOR PLUG-IN OF OUTER AREA SITES FOR THE RECORD OF DECISION HANFORD 100 AREA SUPERFUND SITE (100-FR-1, 100-FR-2, 100-FR-3, 100-IU-2, AND 100-IU-6 OPERABLE UNITS)

CHPRC provided this briefing (see attachment) to the Parties during the IAMIT meeting. This presentation resulted from meetings amongst the Parties to negotiate the AIP for HFFACO Revisions in Response to FFY 2018-2020 Appropriation in Conjunction with the RASCAL Recommendations for Expediting Remedial Cleanup on the Hanford Central Plateau (or Budget/RASCAL AIP) (see Section 2.1.1 above).

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CHPRC stated this presentation proposes to accelerate final remediation of Central Plateau Outer Area waste sites by utilizing the existing 100-F/IU Final Record of Decision (ROD). CHPRC noted the 100-IU-2 and 100-IU-6 OUs encompass the entire River Corridor area not covered by one of the reactor areas or the 300 Area and they are looking at expanding the 100-F/IU ROD to cover this area, since it is located next to the Central Plateau. This concept proposes to incorporate approximately 60 waste sites from the Central Plateau Outer Area that could potentially be added into the 100-F/IU Final ROD using an Explanation of Significant Differences (ESD).

EPA asked CHPRC if the Parties would need to change the definition of the boundary for the 100-IU-2 and 100-IU-6 OUs.

CHPRC responded by saying this is a concept and there are evaluations that need to be done, there are questions that need to be answered, and CHPRC wanted to provide this concept to the Parties to gain approval to proceed with this concept and perform the necessary evaluations.

CHPRC indicated the current baseline schedule assumes these waste sites will be part of the Outer Area OU group, which includes the 200-OA-1, 200-CW-1, and 200-CW-3 OUs.

CHPRC noted that most of the waste sites are in the conservation mining land use area and that has the same land use designation as the vast majority of the River Corridor. A couple of them are right on the edge of the industrial exclusive land use area. CHPRC added this concept excludes the following:

- Waste sites that have potential groundwater implications, like the ponds and the ditches,
- The NRDWL and Solid Waste Landfill because these sites are being addressed under the RCRA Closure Plan,
- Sites in operational areas, such as the Central Waste Complex and Effluent Treatment Facility, and
- Waste sites that are in the industrial exclusive land use area.

CHPRC added that the BC Control Area straddles the line between the conservation mining area and the industrial exclusive area, so this area might need to be segmented or split into two sites. EPA agreed with this statement.

CHPRC indicated this concept presents an opportunity to shrink the Outer Area by about 50 square miles or shrink the active footprint by about 50 square miles, leaving approximately 25 square miles of the site with an active cleanup footprint.

In conclusion, CHPRC asked the IAMIT for confirmation to proceed with the evaluation and ESD development. The next steps would be for the DOE, CHPRC, and EPA to complete a site-by-site evaluation to confirm acceptability for waste site plug-in to the 100-F/IU ROD, reach agreement on which sites would be applicable, prepare the draft ESD, and complete the ESD review and approval process.

EPA agreed this is worth proceeding. EPA noted they have a target date for F/IU closeout this fiscal year that they are responsible for to their headquarters, so having an estimate to evaluate the trade-off or benefits is needed.

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DOE offered to meet in a smaller group setting with EPA, complete a site-by-site evaluation, get agreement on the sites, and then proceed with the ESD so EPA has the information necessary to justify changing their F/IU closeout commitment.

Ecology noted this is mostly an administrative process for EPA to decide because wastes are being moved from one EPA-led OU to another, and EPA just needs Ecology's concurrence on the ESD. Ecology requested to review the language about the industrial exclusive zone because with development of the inner area principles, the Parties had shrunk the inner area boundary as small as possible and did not consider the industrial exclusive boundary.

CHPRC took the action to schedule the meeting between DOE and EPA to start the site-by-site evaluation and send a copy of the presentation to the Parties. The Parties agreed this action would be tracked at the Project Manager level, therefore, this item will not be tracked at the IAMIT level.

4.0 UPCOMING TOPICS/ACTION ITEMS FOR FUTURE IAMIT MEETINGS

MSA asked if there were emerging issues the IAMIT would like to discuss or include on upcoming meeting agendas. The IAMIT representatives did not have any new items to add.

5.0 REVIEW OF TODAY'S ACTIONS/UPCOMING IAMIT MEETINGS

The following actions were captured during the meeting and provided to the Parties following this IAMIT meeting:

No.	IAMIT Topic	Actions from 11/19/20 IAMIT Meeting
1	Waste Management Area A/AX Closure Process "Kaizen"	MSA has the action to coordinate the logistics and provide the Parties with the proposed dates in January 2021 to conduct the Kaizen.
2	Gaps in Deactivation, Decommissioning, Decontamination and Demolition (D4) Planning	DOE took the action to evaluate the contaminated soil and building rubble strategy, ratio strategy, and integration with the M-091 transuranic waste to coincide with the entire shipping sequence, with respect to the inventory.
3	Presentation on Proposal for Plug-in of Outer Area sites for the Record of Decision Hanford 100 Area Superfund Site (100-FR-1, 100-FR-2, 100-FR-3, 100-IU-2, and 100-IU-6 OUs)	CHPRC took the action to schedule the meeting between DOE and EPA to start the site-by-site evaluation and send a copy of the presentation to the Parties.

The next IAMIT meeting is scheduled for December 17, 2020.

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6.0 LIST OF ATTENDEES

Bergman, Theresa	CHPRC
Bowers, Holly	WRPS
Brasher, Stephanie	MSA
Cameron, Craig	EPA
Capron, Jason	DOE
Cline, Michael	DOE
Davis, Scott	MSA
Einan, Dave	EPA
Hamel, Bill	DOE
Harkins, Brian	DOE
Hastings, Rob	DOE
Higgins, Kathy	DOE
Hildebrand, Doug	DOE
Lerch, Jeff	CHPRC
Lobos, Rod	DOE
Lopez, Maria	WRPS
Price, John	Ecology
Turner, Michael	MSA
Welsch, Kim	Ecology



Inter-Agency Management Integration Team (IAMIT) Meeting
Thursday, November 19, 2020
8:00 – 8:50 a.m.

*Meeting held via Teams video/teleconference

Agenda

No	Time	Lead / Org	Topic
1	8:00– 8:02 a.m.	Michael Turner, MSA	Welcome and Meeting Logistics/Format
2	8:02 – 8:20 a.m.	Michael Turner, MSA/ IAMIT and attendees	Review IAMIT Action Tracking Table
3	8:20 – 8:35 a.m.	Theresa Bergman, CHRPC/ Mike Cline, DOE-RL	Proposal for Plug-in of Outer Area Sites for the Record of Decision Hanford 100 Area Superfund Site (100-FR-1, 100-FR-2, 100-FR-3, 100-IU-2, and 100-IU-6 Operable Units)
4	8:35 – 8:45 a.m.	IAMIT members	New Topics for Upcoming IAMIT Meetings
5	8:45 – 8:50 a.m.	Michael Turner, MSA/ IAMIT and attendees	Review of Today's Actions
6	8:50 a.m.	Adjourn	

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TABLE I. ACTION ITEMS¹

1. *Agreement in Principle for the Negotiation of HFFACO Revisions in Response to Federal Fiscal Year (FFY) 2018-2020 Appropriation in Conjunction with the RASCAL Recommendations (IAMIT Determination 2020-006) for Expediting Remedial Cleanup on the Hanford Central Plateau (or Budget/RASCAL AIP)*

Reference:	Agreement in Principle (AIP) approved 8/25/20
Affected Milestone:	M-015-00, M-015-38B, M-015-84, M-015-91B, M-015-92B, M-015-92C, M-015-93B, M-015-93C, M-015-98, M-015-99, M-015-110B, M-015-112, M-016-200A, M-016-200-B, M-085-70, M-085-90
Originated:	12/20/18
Status:	Open - Agreement in Principle (AIP) approved 8/25/20 to conclude negotiations by 1/15/21
Dispute Extended:	N/A
Action:	Negotiating milestones
Comments:	These negotiations are driven primarily by requirements found in HFFACO, Legal Agreement, Paragraph 148.A, which requires DOE-RL to include in its annual budget request to the DOE Office of Environmental Management (DOE-EM) estimated funding levels required to achieve full compliance with HFFACO milestones. The FFY 2018 appropriation by Congress and the FFY 2019 President's budget request to Congress, respectively, were less than the DOE-RL estimated funding levels submitted to DOE-EM. HFFACO, Legal Agreement, Paragraph 149.G allows DOE-RL to propose changes to milestones in response to congressional budget appropriations that are less than estimated funding levels required to achieve full compliance. HFFACO, Legal Agreement, Paragraph 149.D states that DOE-RL shall assess the impacts of the President's budget on DOE-RL's ability to complete milestones on time. At the 12/20/18 IAMIT meeting, Ecology stated they had received drafts of the AIP and TA on 12/19/18, were scheduled to meet with their attorneys to review them, and will respond back to DOE. At the 01/31/19 IAMIT, Ecology stated EPA had been on furlough and needed to restart these discussions. At the 2/21/19 IAMIT, the Parties were asked for an update on status. There was no change in status. At the 3/21/19 IAMIT, Ecology stated that both Ecology and EPA

¹ *New information shown in blue.

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were discussing the language in the AIP and TA and will send to DOE. Action is with Ecology and EPA to provide comments. Ecology questioned the language in the AIP/TA and sent it to EPA for their review. At the 04/24/19 IAMIT, DOE-RL took the action to schedule a teleconference between the Tri-Parties to discuss current status and path forward to negotiations. On 05/06/19, DOE received the AIP from EPA and is currently reviewing it for approval. At the 06/20/19 IAMIT, the parties discussed expectations for the AIP. Ecology stated there is a letter going to DOE regarding budget that was currently in review with Ecology legal. On 07/03/19 Ecology noted it would not sign AIP until it received a response to its letter of 07/10/19 (19-NWP-109). DOE requested an extension to 08/02/19 to respond to the letter. At the 08/15/19 IAMIT meeting, Ecology stated that the AIP remains on hold until it gets a reply to its 07/10/19 letter. DOE said it was still coordinating its response with DOE Headquarters. EPA also requested to see the DOE response when issued. As of 09/09/19, DOE-RL requested Ecology's reconsideration of approving the AIP to begin negotiating the milestones impacted by the FFY 2018 and 2019 budget via letter 19-AMRP-0074. At the 10/17/19 IAMIT Ecology stated they wanted to resolve the issues with TPA Paragraphs 148/149 before signing an AIP. DOE disagreed, saying the issues were separate. At the 11/21/19 IAMIT, the parties agreed that the "Representative Analogous Site Coordinating Agency Liaisons (RASCAL)" team conclusions might provide a resolution to this issue. The RASCAL team, comprised of all three agencies is currently evaluating a proposal, which will ensure consistent remedies for similar conceptual site model groups and associated waste sites, and could potentially reduce characterization pre-ROD and post-ROD. At the 4/16/20 IAMIT, an update on RASCAL Team progress was presented. The IAMIT granted approval to proceed with next steps, the RASCAL Team will: (1) Draft a White Paper, and (2) engage the contractor for cost estimates, to include cost avoidance and proposed milestones and report back to the IAMIT in a couple of months. At the 05/26/20 IAMIT, the RASCAL Team noted it was planning an update to the IAMIT in June, with a possible draft IAMIT Determination and White Paper ready for review as well. Ecology reiterated the RASCAL process will not solve all issues with all of the milestones, in particular milestone M-015-93C for the 200-

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SW-2 Operable Unit. As of 06/11/20, an IAMIT Determination had been drafted and will be shared with the IAMIT. DOE agreed to take M-015-93B and M-015-93C, out of the “budget” negotiations and add them to the M-091 milestone negotiations. At the 6/18/20 IAMIT, the Parties agreed that a new Agreement in Principle (AIP) should be drafted to address RASCAL Team milestones and others that were previously to be addressed in the draft “Budget AIP”. MSA took the action to draft the AIP, which is in review. IAMIT determination 2020-006 “RASCAL Recommendations for Expediting Remedial Cleanup on the Hanford Central Plateau” was signed on 06/23/20. At the 07/16/20 IAMIT meeting, DOE stated they were reviewing the AIPs. The RASCAL Team is currently working on completing the binning of the waste sites and plans to produce a document to memorialize how the RASCAL Team decided to bin the different waste sites. The RASCAL Team anticipates having a few more sessions to complete this process and get it documented. The Parties signed TPA Change Control Form C-20-02, establishing the new 200-IA-1 Operable Unit, on 8/11/20. Milestone M-015-93C was included in the Budget/RASCAL AIP, which was signed 08/25/20, and plans are to conclude negotiations by 01/15/2021. At the 09/17/20 IAMIT, the Parties agreed to combine discussions regarding the TPA dispute on Milestone M-015-93C/Change Control Form M-15-18-03 with the AIP for the Negotiations of HFFACO Revisions in Response to FFY 2018 Appropriation and FFY 2019 President’s Budget, which is now referred to as the AIP for the Negotiation of HFFACO Revisions in Response to FFY 2018-2020 Appropriation in Conjunction with the RASCAL Recommendations (IAMIT Determination 2020-006) for Expediting Remedial Cleanup on the Hanford Central Plateau (or Budget/RASCAL AIP). [At the 10/15/20 IAMIT meeting, EPA stated the negotiations team met twice. The first meeting was an introductory meeting and the second meeting generated some general discussions and actions that DOE is currently working on and will bring back to the negotiations team at the next meeting.](#)

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

Reference:	DOE/RL-2004-60, REV.1, DOE/RL-2019-46
Affected Milestone:	N/A
Originated:	05/16/19
Status:	Open
Dispute Extended:	N/A
Action:	Parties are being asked to consider adopting the Principles and Parameters for use as a standard in producing regulatory documents.
Comments:	<p>IAMIT has agreed to discuss this topic as a “core” IAMIT meeting. No meeting date set. On 6/20/19, Ecology stated they needed to discuss this internally and discuss and would report status at the 07/18/19 IAMIT meeting. At the 07/18/19 IAMIT meeting the parties agreed to refer to this topic as the “Principles and Parameters” and the parties agreed to add this topic to a future regularly scheduled IAMIT meeting to discuss further. At the 08/15/19 IAMIT meeting, the parties agreed to address this issue in a stand-alone, topic-specific IAMIT meeting. MSA took the action to schedule that meeting. Parties have yet to agree on a date for this meeting. At the 10/17/19 IAMIT, the agreed to discuss this subject and path forward at the November IAMIT. The parties also discussed the possibility of assembling a small group to evaluate the principles and parameters and then bring a recommendation back to the IAMIT. At the 11/21/19 IAMIT, the parties agreed to form a small working group, made of up of each agency’s subject matter experts to discuss and eventually bring their conclusions to the IAMIT. At the 12/19/19 IAMIT, the agencies were asked to identify SME’s to form a small working group. Agencies have identified SME’s, the team will consist of:</p> <ul style="list-style-type: none">- Craig Cameron, EPA- John Price, ECY- Doug Hildebrand, RL- Rod Lobos, ORP <p>First meeting of the group occurred 01/23/20. Affected milestones and work plans were discussed as well as a potential IAMIT Determination to document conclusions. Second meeting of the group was held 03/09/20. At that meeting, Ecology handed out a draft letter that parameters (cleanup standards) be applied</p>

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to Waste Management Areas through the CERCLA and RCRA/MTCA processes. Parties met again on 4/09/20 and are still developing a path forward. At the 4/16/20 IAMIT, the Parties agreed the small working group would be on a temporary hold while ECY took the action to examine their internal processes and will let the working group know when they are ready to continue discussions. The working group continues to meet to agree to a version of DOE/RL-2019-46, which if approved, would be added to TPA Appendix F ("Supporting Technical Plans and Procedures"). An IAMIT Determination (2020-007) to accompany DOE/RL-2019-46 has also been drafted and is in review at the staff-level. Ecology is drafting TPA Change Control Form F-20-01 to add the documents to TPA Appendix F. Working group last met on 08/18/20 and is very close to finalizing the document. Targeted completion is September. Draft TPA Change Control Form (CCF) F-20-01 is under review by the agencies, and the group's view is that an IAMIT Determination is not necessary. The group is very close to finalizing DOE/RL-2019-46 and CCF F-20-01. Latest round of comments provided by Ecology Legal. [On 10/28/20, the Parties approved CCF F-20-01 and DOE/RL-2019-46. The IAMIT is being asked to close this action.](#)

Closed: ---

3. Changes/Updates to TPA Paragraphs 148/149

Reference:	Tri-Party Agreement Legal Agreement, paragraphs 148/149
Affected Milestone:	N/A
Originated:	05/16/19
Status:	Open
Dispute Extended:	N/A
Action:	Parties are being asked to revise and update TPA paragraphs 148/149 (see also "Status Updates, item #1 below)
Comments:	IAMIT has agreed to discuss this update and potentially change the TPA Legal Agreement. The parties have been discussing potential changes for a number of years. History and background have been provided. IAMIT is being asked to meet as a "core" team to discuss changes and eventually recommend to the Executive Managers signing a TPA Change Control Form to document those changes. Meeting was held on 06/27/19, with

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the parties' subject matter experts and legal teams to discuss the history and rationale for proposed changes. DOE is reviewing paragraphs 148/149 to look at simplifying the proposed changes and will provide to regulators for review. At the 07/18/19 IAMIT, the parties agreed that a kick-off meeting should be scheduled to sign the AIP and start negotiations. At the 08/15/19 IAMIT meeting, MSA agreed to work with DOE to schedule a kick-off meeting. Parties have yet to agree to a date for the meeting. On 09/09/19, DOE-RL provided to Ecology via letter 19-AMRP-0074, a timeline of efforts made to update the language in 148 and 149 and offered to schedule joint meetings to accomplish this task. At the 10/17/19 IAMIT, DOE noted they would not take further action at this time without further discussion and buy in from the parties to perform a meaningful exercise to revise paragraphs 148 and 149. DOE stated they are committed to following federal law and the TPA and will continue to do so whether these paragraphs are revised or not. At the 11/21/19 IAMIT, the parties agreed an update to reflect current mechanisms of the federal budgeting process is needed and to perform this update via TPA negotiations. MSA took the action to draft an Agreement in Principle (AIP). That AIP would set a March 31, 2020 date for completing negotiations. The parties also expressed the need for their respective lawyers to be included in negotiations. At the 12/19/19 IAMIT, DOE-RL noted they were reviewing the draft AIP. The draft AIP was provided to the regulators for review with comments requested by COB 01/22/2020. EPA and Ecology comments were received on 01/23/20. DOE is currently reviewing the AIP. On 3/23/20, the Parties signed the AIP to begin negotiations, which are currently scheduled to conclude 07/31/20. On 4/07/20, Tri-Party attorneys met to discuss federal budget process and path forward to update these paragraphs. DOE provided responses to ECY/EPA attorney comments made during this meeting for their review. Action remains with ECY/EPA legal to respond back to DOE. No meetings are currently scheduled. At the 05/26/20 IAMIT, the Parties once again agreed that paragraphs 148/148 needed updating, but EPA and Ecology are still unclear of the overall desired outcome of those updates. DOE took the action to reconvene the technical staff and attorneys to continue negotiations. DOE Legal forwarded the embargoed budget guidance to the regulator attorneys and DOE

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is awaiting a response. On 07/30/20, the Parties signed an extension to the AIP, which will allow negotiations to continue until 01/15/21. Negotiation sessions were held on 08/05/20 and 08/18/20, as the Parties continue to negotiate the proposed changes to paragraphs 148/149. At the 09/17/20 IAMIT, the Parties agreed to temporarily suspend negotiations until the Tank Mission Holistic Negotiations progresses further. [At the 10/15/20 IAMIT meeting, no update was provided.](#)

Closed: ---

4. Potential Agreement in Principle to Begin Negotiations on WMA-C Closure Milestones

Reference: Draft TPA Change Control Form M-45-17-01

Affected Milestone: N/A

Originated: 06/18/20 IAMIT Meeting

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to consider signing an Agreement in Principle to begin negotiations on TPA milestones for closure of Waste Management Area-C (WMA-C).

Comments: At the 06/18/20 IAMIT meeting, Ecology asked DOE-ORP (and by extension, all three TPA parties) if would be willing to sign an AIP and enter negotiations regarding TPA milestones for closure of WMA-C. Ecology. Draft TPA change control forms have been exchanged between Ecology and DOE-ORP since 2017, with no agreement reached. At the 07/16/20 IAMIT meeting, the Parties discussed possibly entering into negotiations. However, there was some feedback from the holistic negotiations that this topic may be included. DOE-ORP requested to meet with Ecology to discuss what might be subject to negotiations. At the 08/25/20 IAMIT, DOE stated a meeting was held with Ecology to discuss potential milestones and topics to be included in a draft Agreement in Principle; however, not all applicable Ecology staff were able to attend. DOE indicated the meeting would need to be rescheduled to include the appropriate Ecology staff in these discussions. At the 09/17/20 IAMIT, the Parties agreed that these negotiations could wait until the conclusion of the Tank Waste Mission Holistic Negotiations; however Ecology requested a meeting with ORP to

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discuss the WMA-C mega barrier specifically. Meeting was held 10/05/20. Ecology is now reviewing preliminary specifications and other details of the proposed barrier and will provide comments to ORP. At the 10/15/20 IAMIT meeting, Ecology stated that it views the WMA C closure milestones as independent from any other part of the tank waste mission and that the only correlation to the Hanford tank waste mission holistic negotiations is how it would be funded. DOE stated they would like to progress as much as possible with C Farm closure from a practical approach to reduce their costs of maintaining systems and reduce risk in the tank farms. Ecology agreed with DOE's statement, but wants to meet with DOE in a few weeks to continue discussions.

Closed: ---

TABLE II. STATUS UPDATES

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

Reference:	Tri-Party Agreement Action Plan, Appendices H and I
Affected Milestone:	M-042-00 and M-045-00 series
Originated:	05/16/19
Status:	Open
Dispute Extended:	N/A
Action:	Parties are being asked to review the draft TPA Agreement in Principle for entering into formal negotiations to revise and update TPA Appendices H and I.
Comments:	The parties agree that TPA appendices H and I are outdated and in need of change. Though attempts have been made and proposals for changing have been shared by the parties, no change has occurred. In light of the current 241-C-106 Waiver Request Denial Dispute, the parties are agreeing to enter formal TPA negotiations. At the 6/20/19 IAMIT, the Parties agreed to schedule a kick-off meeting and share the draft AIP, meeting has yet to be scheduled. At the 07/18/19 IAMIT, the parties agreed that an AIP was necessary to enter into negotiations for updates to Appendices H & I in a two-phased approach, first being the easy updates and then proceed to the more challenging updates. The parties also agreed to add TPA section 11.8 (ORP Critical Path)

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as part of these negotiations. At the 08/15/19 IAMIT, MSA took the action to revise the draft Appendix H, I AIP to include TPA section 11.8. Ecology noted that the TPA dispute over retrieval criteria for SST 241-C-106, currently before the Washington State Pollution Control Hearings Board could delay discussions. *Note: the PCHB dispute was dismissed on 04/07/20. At the 10/17/19 IAMIT, the parties agreed revisions to Appendices H and I should be placed on hold pending the path forward determined from the Hanford tank waste mission “holistic” discussions. [At the 10/15/20 IAMIT meeting, there was no change in status.](#)

Closed: ---

2. *Modifications to TPA Section 9.4, “Administrative Record,” to Eliminate Hard Copy Requirements*

Reference:	TPA Section 9.4
Affected Milestone:	N/A
Originated:	11/15/18 (re-opened)
Status:	Open – Change Control Form P-09-18-01 has been drafted.
Dispute Extended:	N/A
Action:	Sign Change Control Form
Comments:	Change Control Form P-09-18-01 in draft, proposes eliminating the requirement to maintain hard-copy files in the Hanford Administrative Record (AR). DOE upgraded the Administrative Record website to enhance search and retrieval capabilities, allow multi-field filtering, provide canned and ad hoc reporting, enable electronic document submittal, and improve system response time. At the December 20, 2018 IAMIT meeting, Ecology indicated they would be ready to sign this change control form when the AR upgrade is complete. The system upgrade was completed in June 2019. At the 07/18/19 IAMIT meeting, Ecology stated they wanted a “validation and verification” meeting to assess the AR upgrades. On 8/28/19, a validation meeting was held. Ecology took the action to propose a new TPA Change Control Form or make changes to the existing (P-09-18-01). On 9/03/19, Ecology stated they would like DOE to prepare AR indexes at regular intervals and will draft a CCF with proposed language to modify Section 9 of the TPA and provide to DOE/EPA for review. Ecology also requested additional functionality in the AR for replicating the RCRA Permit at any given point in time. At

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the 10/17/19 IAMIT, it was noted this action is currently with Ecology to draft the change control form with the proposed modifications to Section 9 of the TPA, to include the Administrative Record indices Ecology has requested from DOE. At the 11/21/19 IAMIT, Ecology noted the progress made on the AR upgrade, but still had concerns about documents being removed from the AR and a lack of procedure for doing so. At the 12/12/19 IAMIT, Ecology took the action to discuss what they propose at the 01/23/20 IAMIT – including draft changes to the TPA. On 01/28/20, Ecology sent the draft TPA Change Control Form to the Parties for review. At the 02/20/20 IAMIT, the Parties agreed to suspend this discussion until the M-035-09K and M-035-09L disputes are settled, though it will still be tracked at the IAMIT level. At the February 20, 2020 IAMIT meeting, DOE noted the proposed changes to Section 9.4 have some nexus to the M-035-09K dispute. The Parties agreed this item should be placed on hold pending the M-035-09K dispute that is with the Washington State Pollution Control Hearings Board. At the 08/25/20 IAMIT, Ecology stated the Parties will be mediating the M-035-09K dispute on September 28-29, 2020. Mediation session was held on September 28-29, 2020. [At the 10/15/20 IAMIT meeting, there was no change in status.](#)

Closed:

3. *Waste Management Area A/AX Closure Process “Kaizen”*

Reference: TPA Section 9.4

Affected Milestone: TBD

Originated: 06/18/20

Status: Open –

Dispute Extended: N/A

Action: Schedule and participate in kaizen

Comments: At the 06/18/20 IAMIT meeting, Ecology suggested ORP and Ecology participate in a structured Kaizen to improve the comment/response process between the two agencies and then applying those improvements to the Waste Management Area A/AX regulatory closure. At the 07/16/20 IAMIT meeting, both DOE and Ecology requested EPA participation in the Kaizen. EPA questioned the need to participate as Ecology is the lead

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regulatory agency for WMA A/AX closure. ORP replied that EPA's closure process is more streamlined and having EPA share their lessons learned would allow the Parties to find a better solution collectively. EPA has agreed to participate in the Kaizen, which will be limited to no more than three sessions, with each session being no longer than three hours. The parties are working with MSA to identify its participants and to find schedule openings. ORP stated it wanted to wait until the start of the 2021 Fiscal Year (10/01/20) to conduct the Kaizen. At the 09/17/20 IAMIT meeting, the Parties agreed to wait until January 2021 to conduct the Kaizen. MSA has the action to coordinate the logistics and schedule the Kaizen in January 2021.

Closed:

4. Gaps in Deactivation, Decommissioning, Decontamination and Demolition (D4) Planning

Reference: ECY letter NWP-20-201 and DOE letter 20-PFD-0013

Affected Milestone: N/A

Originated: 01/23/20 IAMIT Meeting

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to evaluate DOE's proposed lifecycle soil usage versus D4 versus time.

Comments: Correspondence on "Gaps in Planning Deactivation, Decommissioning, Decontamination and Demolition Projects" was added at the 1/23/20 IAMIT. DOE took the action to brief EPA and ECY at the March 2020 IAMIT (to be timed with the RASCAL Team briefing). This will address lifecycle soil usage versus D4 versus time. The IAMIT scheduled for 3/19/20 was cancelled. DOE-RL briefed the IAMIT on 4/16/20, in that briefing, DOE said the on-going Covid-19-related work posture, and pending Hanford prime contract changes may affect this issue and pledged to provide updates. [At the 10/15/20 IAMIT meeting, EPA asked DOE-RL if it could provide a rough order of magnitude on the contaminated soil and rubble to inform negotiations and its expectation for "level of detail" on information it would be providing prior to formal discussions. DOE took the action to](#)

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contact EPA and ECY to discuss D4 planning “level of detail” prior to the next IAMIT meeting.

Closed: ---

5. Calendar Year 2021 Tri-Party Agreement Quarterly Milestone Review and IAMIT Meeting Schedule

Reference: N/A

Affected Milestone: N/A

Originated: 10/15/20 IAMIT Meeting

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to approve the Calendar Year 2021 Tri-Party Agreement Quarterly Milestone Review and IAMIT Meeting Schedule.

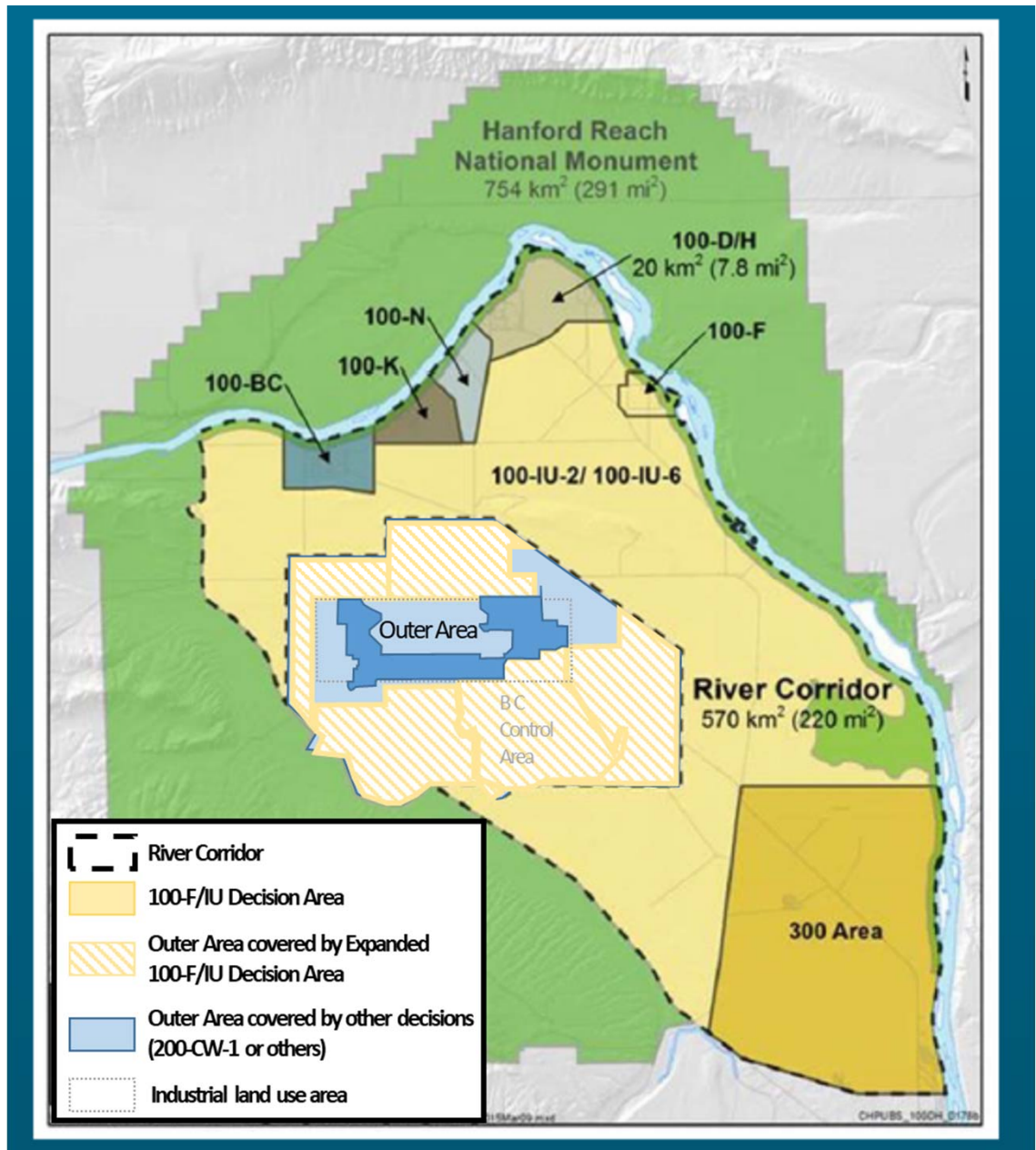
Comments:

TABLE III. RECENTLY CLOSED/OTHER AGREEMENTS

None.

Completing Outer Area sites under 100-F/IU ROD

Briefing to IAMIT
November 2020



Accelerate final remediation of Outer Area waste sites using existing 100-F/IU ROD

- ~60 waste sites in Central Plateau Outer Area could be added in to the 100-F/IU Final Record of Decision (ROD) using an Explanation of Significant Differences (ESD)
 - Current plan assumes that these sites would be included in final ROD for 200-OA-1 & 200-CW-1/3 OU group
- Most sites in conservation/mining land use area
 - 5 sites at east edge of industrial-exclusive land use area
- Could accelerate cleanup of ~50 mi² in the Outer Area and shrink remaining cleanup footprint to ~25 mi²
- Excludes ponds, ditches, NRDWL/SWL, sites in operational areas (CWC/ETF) and most sites in industrial-exclusive land use area

Candidate sites by OU	
200-OA-1	27
200-CW-3	13
100-KR-2	19
Unassigned	2

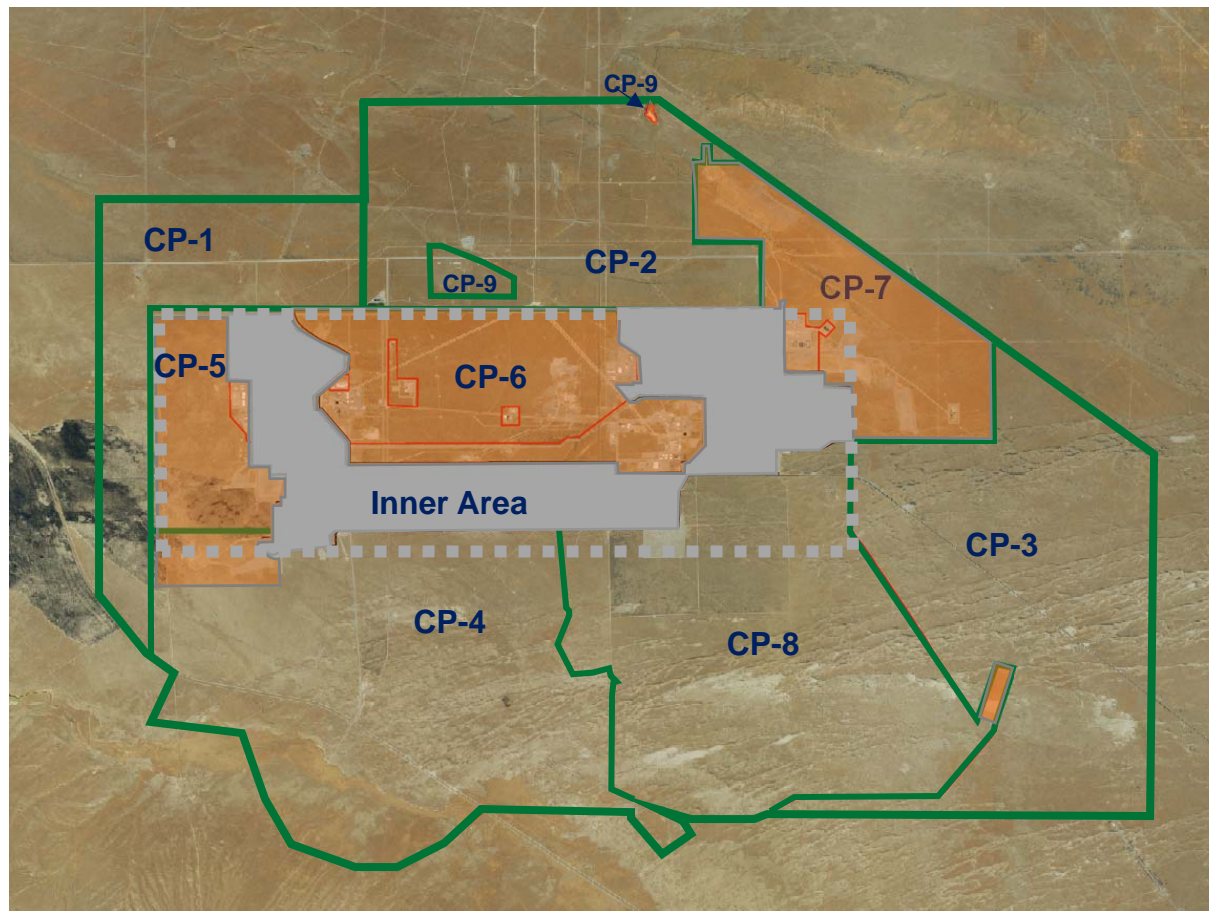


Limited cleanup remaining for candidate sites

- 35 sites – cleanup was completed as an interim action; change to final closure status requires paperwork only
 - 22 sites (200-OA-1) under 200-MG-1 removal action
 - 13 sites (200-CW-3) under 100 Area Remaining Sites ROD
 - Preliminary evaluation: data are adequate to close with ESD
- ~25 sites – still require remediation
 - BC Control Area – partially cleaned up by removal action; site straddles land use areas and may require segmentation
 - OCSA – ~275 acre debris field/foundations north of 200 West Area
 - UPR-600-12 – UNH spill near Route 4 east of 200 East Area
 - 600 OCL – small sanitary landfill on east edge of Central Plateau
 - Remainder are surface debris, foundations and stained soil



Outer Area sections that could be completed



 Outer Area segments excluded (ponds, ditches & operational areas)



 Industrial-exclusive land use area

Conservation/Mining land use area that could be completed		
CP-1	~3,500 acres	~5.5 mi ²
CP-2	~6,000 acres	~9.4 mi ²
CP-3	~7,500 acres	~11.7 mi ²
CP-4	~9,000 acres	~14 mi ²
CP-8	~6,000 acres	~9.4 mi ²
	~34,000 acres	~50 mi ²

Industrial land use area in Outer Area that could be completed		
CP-8	~1,400 acres	~2.2 mi ²

Map of candidate sites



Discussion points with DOE and EPA during ESD development

- May delay closeout of 100-F/IU ROD
- Impact of land-use designation on sites included in ESD
 - Some sites straddle the industrial-exclusive and conservation/mining land use boundaries
 - Direct application of River Corridor cleanup levels in parts of Outer Area
 - Note that sites are generally surface debris or surface/shallow contamination with very similar cleanup actions regardless of location
- Coordinate with removal actions being conducted for M-016-250 milestone series under MG-1 action memo
- Path forward for remaining Outer Area sites in Industrial-Exclusive land use area (CP-6) and ponds (200-CW-1)
- Minimal risk reduction, but remediation will make some soil available for ERDF
- Appropriate public involvement opportunities



Actions required by DOE and EPA

IAMIT

- Confirmation to proceed with ESD development

Develop ESD

- Complete site-by-site evaluation to confirm acceptability for plug-in to 100-F/IU ROD
- DOE & EPA reach agreement on which sites to plug-in
- Prepare draft ESD
- Identify and complete ESD review and approval process

Implement

- Develop final response action reports and reclassification forms for sites already classified as Interim Closed or Interim No Action
- Continue under existing removal actions until ESD is approved
- Update existing 100 Area RD/RAWP (DOE/RL-2014-44) or prepare new RD/RAWP as needed



Backup info



Central Plateau Land Use Designations

