

Interface Agreement
Among BEA, CWI, NRF, and ITG
Concerning
Environmental Reports

12/18/2013

1.0 INTRODUCTION

This Interface Agreement (IA) among Battelle Energy Alliance (BEA), CH2M-WG Idaho, LLC (CWI), Idaho Treatment Group, LLC (ITG), and Bechtel Bettis -Naval Reactors Facility (NRF) is intended to document an agreement among all parties that time critical environmental reports and other deliverables as required by Federal or State regulation will be completed in such a fashion as to be timely, true, accurate, complete and certifiable by all parties and the Department of Energy-Idaho Operations Office (NE-ID). This agreement will remain in effect until the agreement is updated or until a change in contractor signatory to this agreement..

2.0 PURPOSE AND SCOPE

Environmental reports are required by regulation to be submitted to either the State of Idaho Department of Environmental Quality (DEQ) or the U. S. Environmental Protection Agency (EPA) Region 10. A number of reports listed below are time critical in nature and must be compiled and certified by each individual contractor and the Department of Energy-Idaho Operations Office (NE-ID). Data must be compiled and reports must be completed by the Maintenance and Operations (M&O) contractor, BEA, or CWI as applicable in time for a NE-ID review prior to NE-ID's certification. Because of the time critical nature of these reports and submittals, this IA streamlines the request and responses from NRF to either BEA or CWI. In preparation of these sitewide documents listed in the appendix, BEA and CWI will submit a letter to the Environmental Manager at Bechtel Bettis requesting the data submission rather than having to transmit the request to DOE-ID to contact Naval Reactors who would then forward the request to NRF.

This interface agreement documents the responsibilities for coordination, schedules, reviews and certifications among BEA, CWI, ITG, and NRF for preparation of INL Environmental Reports.

Special instructions for contractor handling of the Site Treatment Plan are found in Attachment A. A full list of all environmental reports and due dates is found in Attachment B. Not all environmental reports are time critical, but none the less have important due dates required by regulation. The purpose of providing a full list of environmental reports and due dates is to ensure all contributors are aware of those important dates so they do not become time critical due to lack of attention.

3.0 RESPONSIBILITY BOUNDARIES FOR REPORTS

3.1 Battelle Energy Alliance (BEA) has responsibility for the following:

- Providing quality certifiable BEA data and information for applicable reports.
- Entering, reviewing, updating, and verifying the accuracy of any BEA report related information provided per the appropriate schedules.
- Satisfying the certification requirements as stated in the regulations for each report.
- Transmitting data calls and reports (via email, meeting, or letter) for review and concurrence by NRF, CWI, and ITG as applicable per the attached schedule.
- Development and implementation of procedures for report preparation.
- Incorporation of CWI, NRF, and ITG data/submittals as applicable into applicable final reports.
- Incorporation of CWI, NRF, and ITG comments/corrections into the reports.
- QA/QC of reports for completeness and consistency.
- Transmitting of applicable site-wide reports to DOE or regulator as applicable.
- Obtaining applicable IWTS user training through CWI's database training sessions, including updates.

3.2 CWI is responsible for the following:

- Providing quality certifiable CWI data and information for applicable reports.
- Entering, reviewing, updating, and verifying the accuracy of any CWI report related information provided per the appropriate schedules.
- Satisfying the certification requirements as stated in the regulations for each report.
- Transmitting data calls and reports (via email, meeting, or letter) for review and concurrence by NRF, BEA, and ITG as applicable per the attached schedule.
- Development and implementation of procedures for applicable report preparation.

- Incorporation of NRF, ITG, and BEA data/submittals as applicable into applicable final reports.
- Incorporation of BEA, NRF, and ITG comments/corrections into the reports.
- QA/QC of applicable reports for completeness and consistency.
- Transmitting of applicable site-wide reports to DOE or regulator as applicable.
- Maintenance and operation of the Integrated Waste Tracking System (IWTS) database.
- Development of training for database users and report reviewers. (Notify and provide NRF, ITG, and BEA with the initial training and any updates.)

3.3 NRF is responsible for the following:

- Providing quality certifiable NRF data and information for applicable reports.
- Entering, reviewing, updating, and verifying the accuracy of any NRF report related information provided per the appropriate schedules.
- Satisfying the certification requirements as stated in the regulations for each report.
- Obtaining applicable IWTS user training through CWI's database training sessions, including updates.

3.4 ITG Responsibilities:

- Providing quality certifiable ITG data and information for applicable reports.
- Entering, reviewing, updating, and verifying the accuracy of any ITG report related information per the applicable schedules.
- Satisfying the certification requirements as stated in the regulations for each report.
- Obtaining applicable database user training through CWI's database training sessions, including updates.

3.5 SCHEDULE

- Attachments to this MOA provide a schedule agreed upon by CWI, BEA, ITG, and NRF for reviewing, updating, verifying, concurring with and/or certifying the reports. An agreement must be reached with BEA or CWI as applicable prior to any proposed changes in schedules identified in this Interface Agreement.

4.0 Dispute Resolution

The staffs of the ICP, BEA, ITG, and NRF shall use their best efforts to resolve any disputes under this IA. If a dispute cannot be resolved at staff level, it shall be brought to the attention of the managers of the respective environmental organizations within each company. If a dispute cannot be resolved by management, the issue will be coordinated through DOE-ID for a final determination.

5.0 Limitations of this Agreement

The IA is intended to allocate administrative responsibilities among Department of Energy contractors for site wide reports and correspondence. Nothing in this document is intended to limit, expand or otherwise affect any responsibilities of individual contractors to their respective DOE counterparts.

6.0 Approval

The parties involved have negotiated this agreement in good faith in order to clarify the responsibilities and interface for the production, review and certification of Environmental Reports.

Carolina S. Mascareñas

Director, Environmental Support and Services, BEA

12/18/13
Date

DP Norton

Director, Environmental and Regulatory Services, CWI

12/18/13
Date

Clara Lee

Environmental Compliance and Waste Services Manager, ITG

1/22/14
Date

Christina

Environmental Engineering Manager, NRF

12/18/13
Date

Attachment A

Special Instructions for the Site Treatment Plan

STP Quarterly Meeting and Annual Update/Report Submittal Process

The CWI STP project lead (CWI STP lead) coordinates the development of the quarterly meeting agenda as well as the annual update and annual report. The actions necessary to develop and finalize these documents, along with responsible parties, are detailed below. To ensure these documents are reviewed and finalized by the appropriate contractor and DOE personnel, the CWI STP lead will maintain a list of appropriate DOE and contractor contacts. The list shall include:

- DOE-ID STP Project Manager
- DOE-ID Project Representative
- BEA/ITG/CWI Waste Program Manager
- BEA/ITG/CWI Designated STP Representative

Quarterly Meeting Agenda

Quarterly meetings will be held the last Wednesday of the Quarterly Meeting Month (October, January, April, and July). In preparation for holding the quarterly meetings, the following will occur:

1. 4th Wednesday prior to the Quarterly Meeting. The CWI STP lead will send out a reminder to the designated STP contractor representatives that quarterly meeting agenda information needs to be transmitted by the following Wednesday. The CWI STP lead will also provide the designated STP contractor representatives the results of the IWTS query (where applicable) on waste stream volume changes.

Contractor representatives will provide the CWI STP lead with information required for the meeting agenda, copying the DOE-ID STP Project Manager on associated emails. Information will include:

- Updates for the milestone, planning date, and new mixed waste stream status sections.
- Changes in covered waste streams section. ITG will provide the necessary information.
- Updates for the proposed revisions and issues sections, including issues requiring action during the Quarterly Meeting (e.g., milestone extension, new waste streams, etc.), and any other information that needs to be shared (e.g., partial container treatment on waste

treatment status updates received during the quarter and any roll over any appropriate status items from the previous meeting.)

2. 3rd Wednesday prior to Quarterly Meeting. By COB, the CWI STP lead will send the draft agenda out to the designated STP contractor representatives and the DOE-ID STP Project Manager for review. Contractors will review and make changes with the CWI lead, then ensure that concurrence has been reached with the CWI STP lead on the final agenda and provide concurrence by email, closed copying the DOE-ID Projects Representative and DOE-ID STP Project Manager no later than COB of the following Tuesday.
3. 2nd Wednesday prior to Quarterly Meeting. CWI STP lead will forward STP agenda to DOE-ID Project manager no later than noon.
4. 1st Wednesday prior to quarterly meeting. DOE-ID STP Project Manager will forward approved STP agenda to DEQ.
5. Last Wednesday of Quarterly meeting month. DOE conduct STP Quarterly Meeting with DEQ

Quarterly Meeting Minutes

- The CWI STP lead will be responsible for taking minutes during the meeting.
- 1. Within one day following the meeting, the CWI STP lead will provide draft meeting minutes to the designated STP contractor representatives and DOE-ID STP Project Manager for review.
 2. Within five days following the meeting, the representatives and DOE-ID will provide input on the draft meeting minutes to the CWI STP lead.
 3. Within six days following the meeting, the CWI STP lead will forward the final meeting minutes to the designated contractor representatives. The designated contractor representatives will provide concurrence by email to the CWI STP lead, closed copying the DOE-ID Projects Representative and DOE-ID STP Project Manager.
 4. Within 7 days following the meeting, the CWI STP lead coordinator will forward the final meeting minutes to the DOE-ID STP Project Manager. The DOE-ID STP Project Manager will approve the minutes and forward to DEQ for review and concurrence.

Annual Update and Report

- Per Sections 2.3.3 and 2.3.4 of the STP, respectively, an Annual Update and an Annual Report are to be submitted to DEQ by November 15 each year. These documents provide a consolidation of the changes and progress that DOE has made in the previous year. To develop and finalize the Update and Report, the following will occur:
 1. By the end of the last week of September, the CWI STP lead will notify the designated STP contractor representatives that updates to the previous year's Annual Update and Annual Report need to be submitted by the end of the first week of October.
 2. By the end of the first week of October, each designated STP contractor representative will submit updates to the CWI STP project lead.
 3. By the end of the second week of October, the CWI STP lead will compile the updates provided and submit the revised update and report to the designated contractor representatives for review and concurrence (The CWI STP lead will also submit to the DOE-ID STP Project Manager at this time for draft review).
 4. By the end of the third week of October, the designated contractor representatives will provide concurrence by email to the CWI STP lead, closed copying the DOE-ID Projects Representative and DOE-ID STP Project Manager.
 5. By the Monday following the fourth week of October the CWI STP lead will submit the update and report to the DOE-ID STP Project Manager for review and approval and transmittal to DEQ.

Attachment B

Schedule for activities covered under this Interface Agreement

Title	Frequen cy	Coordina tor	Contractor Input Date¹₂	Due Date to DOE¹	Due Date to Regulator	Site Facilities Included
EPCRA 312 Annual Report	Annually	BEA	1/25/YYYY	02/14/YYYY	03/01/YYYY	CWI BEA ITG NRF
EPCRA 311 Quarterly Reports	Quarterly	BEA	03/07/YYYY, 6/07/YYYY, 9/07/YYYY, 12/07/YYYY	03/15/YYYY, 6/15/YYYY, 9/15/YYYY, 12/15/YYYY	4/01/YYYY, 7/01/YYYY, 10/01/YYYY, 01/01/YYYY	CWI BEA ITG NRF
EPCRA 313 Threshold Report	Annually	DOE	NA	3/20/YYYY		CWI BEA ITG NRF
EPCRA 313 Annual Report	Annually	DOE	NA	06/01/YYYY	7/01/YYYY	CWI BEA ITG NRF
Toxic Exemption Air Pollutant Report	Annually	BEA	3/01/YYYY	04/01/YYYY	5/01/YYYY	CWI BEA ITG
Title V Semi-Annual Monitoring Report	Annually	BEA	Fourth Monday of July	8/11/YYYY	8/31/YYYY	CWI BEA ITG NRF
Title V Annual Compliance Certification	Annually	BEA	Third Monday of January	2/08/YYYY	2/28/YYYY	CWI BEA ITG NRF
Annual NESHAPS Radioactive Emission Report	Annually	BEA	3/30/YYYY	05/31/YYYY	6/30/YYYY	CWI BEA ITG NRF
Air Emission Invent. & An. Fee Regis	Annually	DOE	Third Monday of February	2/28/YYYY	4/01/YYYY	CWI BEA ITG
Annual NESHAPS Asbestos Reporting	Annually	BEA	01/07/YYYY	01/15/YYYY	01/31/YYYY	CWI BEA

Title	Frequen cy	Coordina tor	Contractor Input Date¹₂	Due Date to DOE¹	Due Date to Regulator	Site Facilities Included
Annual NESHAPS Asbestos Notification	Annually	BEA	11/15/YYYY	12/01/YYYY	12/21/YYYY	CWI BEA
TSCA Document Log & Annual Inventory	Annually	BEA	4/01/YYYY	06/01/YYYY	7/01/YYYY	CWI BEA ITG NRF
TSCA Radioactive Waste Inventory	Annually	BEA	4/01/YYYY	06/01/YYYY	7/01/YYYY	CWI BEA ITG NRF
Fees for Construction of Ground Water Monitoring Wells	Annually	BEA	11/25/YYYY	01/15/YYYY	01/30/YYYY	CWI BEA ITG NRF
Comprehensive Well Inventory and the Annual Water Use Report	Annually	BEA	3/12/YYYY	05/28/YYYY	6/28/YYYY	CWI BEA ITG NRF
Annual Groundwater Monitoring Plan	As Needed	BEA	Anticipate submitting on 01/30/2012	Per the INL CDRL		CWI BEA USGS
INL RCRA Part B Permit Condition II.K.1 Pollution Prevention Plan	Every 4 years	CWI	Last Submitted 1/15/2011	Last Submitted 03/01/2011	Last Submitted 03/31/2011	CWI BEA ITG NRF
INL RCRA Permit Condition II.J.3. Biennial Waste Report and Idaho Annual Hazardous Waste Generator Report	Annually	CWI	1/15/2011	02/01/YYYY	03/01/YYYY	CWI BEA ITG NRF
INL RCRA Part B Permit Condition II.J.2, Waste Minimization Program Certification	Annually	DOE	NA	02/01/YYYY	03/01/YYYY	CWI BEA ITG NRF
Volume 3 - General Information	Annually	CWI	6/1/YYYY	6/30/YYYY	7/30/YYYY	CWI BEA ITG NRF
Environmental Monitoring Plan Updates	As Needed	BEA	Last Submitted August 2012	Per the INL CDRL	NA	CWI BEA ITG
40 CFR 98 Mandatory GHG Emissions Annual Report	Annually	BEA	2/17/YYYY	03/01/YYYY	04/01/YYYY	CWI BEA ITG NRF

Title	Frequen cy	Coordina tor	Contractor Input Date¹₂	Due Date to DOE¹	Due Date to Regulator	Site Facilities Included
Annual FY Site Sustainability Plan and FY CEDR	Annually	BEA	11/01/YYYY	12/06/YYYY		CWI BEA ITG
RCRA Treatability Study Report	Annually	CWI	02/01/YYYY	2/15/YYYY	03/15/YYYY	CWI BEA ITG NRF
Annual Site Environmental Report	Annually	Gonzales-Stoller Surveillance	05/01/YYYY	05/01/YYYY	NA	CWI BEA ITG
Site Treatment Plan Quarterly mtg Agenda	Quarterly	CWI	4-th Wed prior to STP Quarterly 01/xx/YYYY, 4/xx/YYYY, 7/xx/YYYY, 11/xx/YYYY	2-nd Wednesday prior to STP Quarterly 01/xx/YYYY, 4/xx/YYYY, 7/xx/YYYY, 11/xx/YYYY	1st Wednesday prior to STP Quarterly 01/xx/YYYY, 4/xx/YYYY, 7/xx/YYYY, 11/xx/YYYY	CWI BEA ITG NRF
STP Annual Update and Report	Annually	CWI	10/14/YYYY	10/28/YYYY	11/7/YYYY	CWI BEA ITG NRF

1. Due dates may vary from year to year. If the due date is not on a work day, it may be as early as three days before the weekend nearest the due date.

2. Contractor input is certified as applicable according to regulation.

INL Multiple Contractor Reports Schedule

Item Number	Title	Frequency	Remarks	Coordinator	Contractor Input Date ^{1,2}	Due Date to DOE ¹	Due Date to Regulator	Site Facilities Included
F.04	EPCRA 312 Annual Report	Annually	Annual EPCRA 312 report certified by the contractor. DOE submits annually 3/1 to EPA.	BEA	1/25/YYYY	02/14/YYYY	03/01/YYYY	CWI BEA ITG NRF
F.03	EPCRA 311 Quarterly Reports	Quarterly	EPCRA 311 Quarterly reports. DOE submits to EPA (1/1, 4/1, 7/1, 10/1).	BEA	03/07/YYYY, 6/07/YYYY, 9/07/YYYY, 12/07/YYYY	03/15/YYYY, 6/15/YYYY, 9/15/YYYY, 12/15/YYYY	4/01/YYYY, 7/01/YYYY, 10/01/YYYY, 01/01/YYYY	CWI BEA ITG NRF
	EPCRA 313 Threshold Report	Annually		DOE	NA	3/20/YYYY		CWI BEA ITG NRF
F.05	EPCRA 313 Annual Report	Annually	M066	DOE	NA	06/01/YYYY	7/01/YYYY	CWI BEA ITG NRF
F.28	Toxic Exemption Air Pollutant Report	Annually	Toxic Exemption Air Pollutant Report certified by the contractor. Contractor submits to regulators by May 1.	BEA	3/01/YYYY	04/01/YYYY	5/01/YYYY	CWI BEA ITG
F.31a	Title V Semi-Annual Monitoring Report	Annually	Annual compliance certification and semi-annual monitoring reports required by the INL Tier I Operating Permit No. T1-030520.	BEA	Fourth Monday of July	8/11/YYYY	8/31/YYYY	CWI BEA ITG NRF
	Title V Annual Compliance Certification	Annually		BEA	Third Monday of January	2/08/YYYY	2/28/YYYY	CWI BEA ITG NRF
F.26	Annual NESHAPS Radioactive Emission Report	Annually	Annual Site-Wide NESHAPS radioactive emission reporting certified by the contractor. DOE submits to regulators June 30.	BEA	3/30/YYYY	05/31/YYYY	6/30/YYYY	CWI BEA ITG NRF
F.29	Air Emission Invent. & An. Fee Regis	Annually	DEQ Annual Air Emission Inventory certified by the contractor. Due date expected to be March 31st. Maintain the air emissions inventory database. DOE submits to regulators.	DOE	Third Monday of February	2/28/YYYY	4/01/YYYY	CWI BEA ITG
F.35	Annual NESHAPS Asbestos Reporting	Annually	Annual NESHAPS Asbestos Reporting certified by the contractor. Contractor submits to DEQ by January 31.	BEA	01/07/YYYY	01/15/YYYY	01/31/YYYY	CWI BEA
F.34	Annual NESHAPS Asbestos Notification	Annually	Annual NESHAPS Asbestos Notification certified by the contractor. Contractor submits to regulators by 12/21.	BEA	11/15/YYYY	12/01/YYYY	12/21/YYYY	CWI BEA
F.08	TSCA Document Log & Annual Inventory	Annually	Site-wide TSCA Document Log and Annual Inventory in accordance with EPA letter dtd 11/26/99. Contractor submits to regulators by July 1.	BEA	4/01/YYYY	06/01/YYYY	7/01/YYYY	CWI BEA ITG NRF
F.09	TSCA Radioactive Waste Inventory	Annually	Site-wide TSCA Radioactive Waste Inventory in accordance with EPA letter dated 11/30/07. Contractor submits to regulators by July 1.	BEA	4/01/YYYY	06/01/YYYY	7/01/YYYY	CWI BEA ITG NRF
F.20	Fees for Construction of Ground Water Monitoring Wells	Annually	Fees for Construction of Ground Water Monitoring Wells. Contractor submits to regulators Jan 30.	BEA	11/25/YYYY	01/15/YYYY	01/30/YYYY	CWI BEA ITG NRF
F.23	Comprehensive Well Inventory and the Annual Water Use Report	Annually	Submit the Comprehensive Well Inventory and the Annual Water Use Report (combined). Contractor submits to regulators June 28.	BEA	3/12/YYYY	05/28/YYYY	6/28/YYYY	CWI BEA ITG NRF

INL Multiple Contractor Reports Schedule

Item Number	Title	Frequency	Remarks	Coordinator	Contractor Input Date ^{1,2}	Due Date to DOE ¹	Due Date to Regulator	Site Facilities Included
F.14	Annual Groundwater Monitoring Plan	As Needed	Annual Groundwater Monitoring Plan and revision, as needed to maintain accuracy.	BEA	Anticipate submitting on 01/30/2012	Per the INL CDRL		CWI BEA USGS
F.57	INL RCRA Part B Permit Condition II.K.1 Pollution Prevention Plan	Every 4 years	4 year report/planned certification due March 1, 2007, and a minimum of each 4 years in future. Contractors submit separate certifications to DOE. DOE submits certification to DEO.	CWI	Last Submitted 1/15/2011	Last Submitted 03/01/2011	Last Submitted 03/31/2011	CWI BEA ITG
F.56	INL RCRA Permit Condition II.J.3. Biennial Waste Report and Idaho Annual Hazardous Waste Generator Report	Annually	Annual report and certification due March 1. Contractors submit separate certifications.	CWI	1/15/2011	02/01/YYYY	03/01/YYYY	CWI BEA ITG NRF
F.55	INL RCRA Part B Permit Condition II.J.2, Waste Minimization Program Certification	Annually	Annual report and certification due March 1. Contractors submit separate certifications.	DOE	NA	02/01/YYYY	03/01/YYYY	CWI BEA ITG
	Volume 3 - General Information	Annually		CWI	6/1/YYYY	6/30/YYYY	7/30/YYYY	CWI BEA ITG NRF
F.12	Environmental Monitoring Plan Updates	As Needed	Update the INL Environmental Monitoring Plan as needed. Review the plan annually to assess the necessity for updates. At a minimum, the plan will be updated every three years.	BEA	Last Submitted August 2012	Per the INL CDRL	NA	CWI BEA ITG
	40 CFR 98 Mandatory GHG Emissions Annual Report	Annually		BEA	2/17/YYYY	03/01/YYYY	04/01/YYYY	CWI BEA ITG
	Annual FY Site Sustainability Plan and FY CEDR	Annually		BEA	11/01/YYYY	12/06/YYYY		CWI BEA ITG
	RCRA Treatability Study Report	Annually		CWI	02/01/YYYY	2/15/YYYY	03/15/YYYY	CWI BEA ITG
	Annual Site Environmental Report	Annually	Applicable information for inclusion in the Annual Site Environmental Report to DOE-ID.	Gonzales-Stoller Surveillance	05/01/YYYY	05/01/YYYY	NA	CWI BEA ITG
	Site Treatment Plan Quarterly mtg Agenda	Quarterly		CWI	4-th Wed prior to STP Quarterly 01/xx/YYYY, 4/xx/YYYY, 7/xx/YYYY.	2-nd Wednesday prior to STP Quarterly 01/xx/YYYY, 4/xx/YYYY, 7/xx/YYYY.	1st Wednesday prior to STP Quarterly 01/xx/YYYY, 4/xx/YYYY, 7/xx/YYYY.	CWI BEA ITG NRF
	STP Annual Update and Report	Annually		CWI	10/14/YYYY	10/28/YYYY	11/7/YYYY	CWI BEA ITG NRF
1. Duedates may vary from year to year. If the due date is not on a work day, it may be as early as three days before the weekend nearest the due date.								
2. Contractor input is certified as applicable according to regulation.								