

**FINAL MEETING SUMMARY**

**HANFORD ADVISORY BOARD  
RIVER AND PLATEAU COMMITTEE**

*November 13, 2013*

*Richland, WA*

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*This is only a summary of issues and actions in this meeting. It may not represent the fullness of ideas discussed or opinions given, and should not be used as a substitute for actual public involvement or public comment on any particular topic unless specifically identified as such.*

**Opening**

Pam Larsen, River and Plateau Committee (RAP) chair, welcomed the committee and introductions were made. The committee approved the August meeting summary.

**Update on Work in the River Corridor\***

*Introduction*

Pam said the Remedial Investigation/Feasibility Study (RI/FS) for work in the River Corridor is underway. RAP requested an update on progress in order to help the committee determine when and if Hanford Advisory Board (Board or HAB) advice might be appropriate.

*Agency presentation*

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\* Please see Attachment 1 – Transcribed Flip Chart Notes for key points/follow up actions recorded during the committee discussion.

Tom Teynor, U.S. Department of Energy (DOE) – Richland Operations Office (RL), and Don McBride, Washington Closure Hanford (WCH), provided a presentation on cleanup progress in the River Corridor (Attachment 2 and Attachment 3). Tom and Don noted the following points during their presentation:

- The River Corridor cleanup project has been categorized as red because it is in danger of not meeting the targeted end date of September 2019. The project is also in danger of exceeding project cost and has consequently been given a yellow rating. These concerns are largely due to insufficient budget.
- Overall, work in the River Corridor has been very successful and the bulk of the work will be completed by 2015 as assigned. Work not expected to be completed in 2015 includes portions of the 100-K Area, 324 Building and the 618-10/11 Burial Grounds.
- In the 300 Area, there are 11 facilities and 134 waste sites remaining to be remediated. DOE would like to remediate 80 of the remaining waste sites and demolish all remaining facilities in Fiscal Year 2014, with the exception of the 324 Building.
- F Area is the first reactor area to be completed and has been moved into Long-Term Stewardship (LTS) under the control of Mission Support Alliance (MSA). The bulk of the work is complete but there are still a few remaining cleanup actions.
- Infrastructure is being prepared to lift the Plutonium Recycle Test Reactor (PRTR) and transport it to the Environmental Restoration Disposal Facility (ERDF). Plutonium contamination under the building has made the work extremely difficult.
- DOE is hoping to award a contract in mid-January for remediation of the 324 Chemical Materials Engineering Laboratory. DOE is continuing to monitor the contaminated soils under B Cell through angle probes. Ensuring the structural integrity of the building is very important and the entire project is very complex. At this point, the building itself is acting as a cap to help contain the contamination. DOE is working to remediate soils by 2017 and remove the entire facility by 2019 to meet the end date milestone.

#### *Regulator perspectives*

Alicia Boyd, Washington State Department of Ecology (Ecology), said a lot of resources have been used to remediate chromium from deep in the soil and Ecology has been working with DOE and WCH to address the issue. The D and H RI/FS is in comment resolution. Ecology is addressing quite a few of the big picture items in this RI/FS with the hope that the 100 N RI/FS review process will be shorter. Ecology has submitted their first round of comments but have not begun negotiations for comment resolution. In general, Ecology is pleased with progress in the River Corridor.

Larry Gadbois, U.S. Environmental Protection Agency (EPA), said work at the Hanford Site has mostly been focused along the River Corridor especially as budgets have been tightened. Work in the Central Plateau has been very affected by budget cuts. Despite challenges with the budget, the large volume of work, and the technically challenging nature of the work, a lot of progress has been made.

*Committee Questions and Responses*

*Note: This section reflects individual questions, comments, and agency responses, as well as a synthesis where there were similar questions or comments.*

Q. Are materials removed during burial ground remediation being moved to other locations within the Central Plateau?

*R. [DOE] Soils and debris that meet waste acceptance criteria will be moved to ERDF. Materials that do not meet the criteria will remain on the Central Plateau. Materials that are suspected to be Transuranic Waste (TRU) will go through waste receiving and processing for more detailed analysis and possible shipment to the Waste Isolation Pilot Plant (WIPP). DOE will prepare materials into a WIPP-certifiable container but is not responsible for the actual certification.*

Q. Could DOE explain more about the Columbia Generating Station (CGS) license amendment?

*R. [DOE] The trench work falls into Category 3 because the work is adjacent to an operating nuclear power plant. DOE must complete a Documented Safety Analysis (DSA) before drafting a final analysis report in order to ensure that Energy Northwest, DOE, and the Nuclear Regulatory Commission are satisfied that remediation activities will not impact the operating ability or workers at Energy Northwest.*

C. What is the status of the Vertical Pipe Units (VPUs) or caissons?

*R. [DOE] Trench remediation will begin in 2015. DOE will be testing methods that have already been used on the VPUs. Work on the caissons near 618-11 has yet to be engineered; DOE is completing work in a phased approach so lessons learned can be incorporated into next steps. Budget constraints also require that work be completed in series.*

Q. Are there other culturally sensitive sites similar to the D and H Areas?

*R. [DOE] DOE is working with the tribes to remediate many culturally sensitive areas along the Columbia River and beyond. DOE must go through an assessment process before beginning any work to identify culturally sensitive sites.*

C. The red flag categorization is unfair because this project has performed very well. Red flags are generally issued as a result of contractor performance issues; red flags are not usually issued because of circumstances beyond the agency's control. DOE and the contractors have performed very well.

Q. Can the regulators speak more about the public process and when determinations will be made on petroleum remediation?

*R. [Ecology] The state regulations for petroleum and those proposed in the final Record of Decision (ROD) contain a very basic cleanup level for petroleum using 1996 Model Toxics*

*Control Act (MTCA) standards. The current analysis is very detailed using newer MTCA methodology. The stringency of petroleum cleanup determinations are driven by risk and not by specific numbers. The agencies will be considering different cleanup options in detail under scenarios for leaving material in place, excavation, or bioremediation. Ecology has given DOE many comments regarding petroleum for the RI/FS. More information is needed for final cleanup decisions.*

Q. What is the status of remediation near sewer lines and electrical power lines that are currently in operation?

*R. [DOE] That remediation work is in process. Electrical lines have been shifted in the 300 Area and an approach to the sewer lines is still being discussed.*

*[WCH] The process sewer lines are in the current scope and remediation is beginning this year. Areas of the sewer lines that are in operation will be dealt with later. The process sewers north of the apple orchards have undergone initial cleanup and have already been re-vegetated. The southern lines will be addressed beginning later this year.*

Q. Can DOE provide some sort of schedule handout that includes information on those areas slated to be cleaned up in early summery 2014. Cleanup contractors and LTS contractors are not on the same schedule so it is important to understand when transitions are planned to take place. It would be helpful to coordinate the public involvement schedule with the cleanup schedule.

*R. [EPA] The 100 F Proposed Plan is still scheduled to be released in early January for public comment.*

DOE said that the RI/FS for D and H will be issue in February and it might be timely for RAP to have another briefing from DOE at that time. DOE can also follow up on the topic during the December Tri-Party Agreement (TPA) quarterly update.

### **Briefing on the Plutonium Finishing Plant and the Remedial Action Work Plan\***

#### *Agency presentation*

Mike Swartz, CH2M Hill Plateau Remediation Company (CHPRC), provided a presentation on the Plutonium Finishing Plant (PFP) Closure Project. In his presentation, Mike noted the following points:

- PFP is scheduled to be safely and compliantly demolished by 2016. A large proportion of the work has already been completed.

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\* Please see Attachment 1 – Transcribed Flip Chart Notes for key points/follow up actions recorded during the committee discussion.

- Activities are all in compliance with CERCLA requirements and in accordance with DOE work plans. Draft B of the Remedial Action Work Plan to complete deactivation and conduct demolition of major structures is expected to be completed in FY 2014 with estimated approval in September 2014.
- Open air demolition is planned for several structures using standard industrial equipment. A variety of techniques will be employed to ensure work is completed safely and efficiently.
- PFP is one of the most challenging and complex clean-up projects within the DOE complex today. Stabilized funding is important to accelerate project completion and will allow cost savings.

#### *Regulator perspectives*

Rick Bond, Ecology, said PFP is an Ecology led project. Ecology has been working closely with DOE and the contractors. The Removal Action Work Plan will likely be ready for review next summer. Work is progressing as expected. DOE reported about a year ago that the September 2016 milestone target date was in jeopardy but the agency is still working to meet that milestone, despite budget challenges. Ecology is particularly concerned about open air demolition in the 209 Building but believes the work can be accomplished.

#### *Committee Questions and Responses*

*Note: This section reflects individual questions, comments, and agency responses, as well as a synthesis where there were similar questions or comments.*

Q. Does DOE foresee any issues with reducing the size of the glove boxes enough to meet the size criteria for disposal?

*R. [CHPRC] The work being completed currently will not fit into a standardized container. Foam is being applied to fill extra spaces in the glove boxes. Low dose areas will be segmented into smaller pieces in order to fit into WIPP-compliant containers. A small subset of material may need to be disposed of differently.*

Q. One of the challenges at PFP has been to encourage the use of technologies that have not been used before; the pencil tanks are a great example of this effort. What is the status of the pencil tanks?

*R. [CHPRC] The current challenge is changing operations. Cables needed to be changed because of degradation from being in an acidic environment. The Plutonium Reclamation Facility (PRF) will be on critical path and will be the last structure for demolition.*

Q. Will there be any sort of public involvement process regarding the work at PFP? The work is a good news story that should be shared with the public, especially since there has been so much public interest and this is one of the most highly contaminated areas at the Hanford Site.

*R. [DOE] DOE typically does not do that type of thing but can consider it from an educational perspective. Lessons learned are required for the Consent Decree closure process.*

The committee decided to speak with the Public Involvement and Communications committee (PIC) in June about possible PFP public involvement opportunities. RAP would also like to share the PFP presentation with the entire Board during the December meeting. There also may be an opportunity for a tour of PFP as well, perhaps in spring 2014.

### **Briefing on Central Plateau Cleanup Strategy\***

#### *Introduction*

Dale Engstrom, RAP vice-chair, said DOE and the TPA agencies had previously developed a strategy for the Central Plateau. The strategy includes boundaries for the inner and outer areas and how the cleanup will shrink the entire footprint of the Hanford Site. There have been recent discussions on new approaches for the Central Plateau and which activities are more important to determine next steps. The state of Oregon has held similar discussions that were very valuable. The Board should be involved in these decisions early and take part in discussions so advice can have a greater impact. Board efforts should start to concentrate more on the Central Plateau, driven in part by a request from Dennis Faulk, EPA.

#### *Agency presentation*

Jon Peshong, DOE-RL, said DOE is currently focused on the River Corridor and meeting the goals outlined in the 2015 Vision. The scope has expanded over time while DOE funding has been reduced. This reduction in funding equates to approximately \$500 million less than DOE anticipated and a delay of some of the work outlined in the 2015 Vision. The schedule on some decision documents is being delayed because of the budget. There will not be new start-up work envisioned in the Central Plateau this year. DOE is still working to have PFP slab-on-grade in 2016. Solid waste activities are ongoing, the pump and treat systems are operational, and surveillance and maintenance activities are also ongoing. Additional cleanup between now and 2015 will be minimal aside from discrete implementations of the UP-1 ROD and treatment of the uranium plume near ERDF.

#### *Regulator perspectives*

Emy Laija, EPA, said groundwater and the River Corridor are priorities for EPA. She questioned what “discrete implementation” means for UP-1. EPA plans to have comments on perched water and Ecology will complete their review by December 10. The document will likely be available in early January, depending on the nature of the legal comments received.

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## *Committee Questions and Responses*

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C. DOE will likely suggest more areas be moved into LTS as River Corridor cleanup efforts continue and there are fewer areas to cleanup. Leftover funding from completed cleanup work should be applied to other Central Plateau efforts. The Board should suggest that DOE support work in the Central Plateau and provide some Board priorities on which activities should be completed first. That Board could develop a framework outlining the work occurring over the next two years. A preliminary framework has been started (Attachment 4) that can be added to in order to fully reflect Board values and priorities.

Q. What is the status of the BC-Cribs? EPA provided comments in March and RAP requested a meeting with DOE in April. EPA is also asking DOE to provide an update on the BC-Cribs; the process is out of line with normal procedures.

*R. [DOE] DOE is not prepared to speak to the BC-Cribs.*

Q. Is there any new information about the Plutonium Uranium Extraction Plant (PUREX) tunnels?

*R. [DOE] DOE is in discussions about the approach as part of the Central Plateau discussions. The tunnels contain a high level of radiation that has been built up over a number of years. DOE has not changed their proposed approach.*

C. DOE generates a Lifecycle, Scope, Schedule and Cost (LSSC) Report annually and is aware of the work scope at the Hanford Site. Presumably DOE already has a priority list for work to be completed under different levels of funding.

*R. [DOE] DOE does have a prioritization strategy for work at the Hanford Site, which is laid out in the Integrated Priority List (IPL). The IPL is based on the 2015 Vision and is distributed throughout the budget process. There are approximately 200 line items. It would be useful to speak about scope rather than time.*

C. There was a concern years ago after a budget exercise when the Board was told that whenever closure is completed, all the remaining funding will be shifted to larger sites. The Board was eventually told that will not occur but it is important for the Board to stay involved in the process so that as areas are cleaned, the funding still exists to move into other areas of Hanford Site cleanup efforts. Decisions about cleanup around the DOE complex can affect work at the Hanford Site.

C. The Board would like to have all the decision documents organized so the Board is easily able to determine the overall public involvement timeline and is ready to respond appropriately. The Board needs to have an understanding of when decision documents are scheduled to be issued. It is also important to understand what work could be completed immediately if funding does become available.

C. The steering committee worked on the Central Plateau document for approximately one year in consultation with all the agencies. Then there was no additional funding so the document was tabled but that document does still exist and contains many larger questions about the end-state of the Central Plateau. There are also larger questions about the implication of moving areas into LTS.

C. RAP should be having discussions about their feelings regarding the larger cleanup issues in the Central Plateau and which issues are most important. Committee input is very important to build a document outlining Board priorities for Central Plateau cleanup.

C. There are concerns that items may be given a high priority without understanding all the information and being strategic with recommendations. Off-site disposition is an important consideration that the Board does not fully understand now. WIPP may be filled and close before all Hanford materials are shipped there. There are a limited number of disposition options within the DOE complex.

*R. [DOE] WIPP or a WIPP-equivalent will be available for high-level waste. DOE believes that ERDF will have enough capacity for what is needed. It is worth examining concerns about the ability to dispose of material off-site. There is an interplay between the amount of material exhumed, off-site disposal capability and the impact to human health and the environment. Decisions are not easy.*

C. Preparation of a document outlining the Board's priorities for the Central Plateau will be an enormous endeavor. The work should be divided; issue managers can discuss overarching HAB values and translate those into Central Plateau work. The cleanup will occur over decades so the Board's recommendations can be given in stages. The recent HAB values white paper might be a good place to begin.

As a starting point, Dale provided a draft list of potential cleanup issues to committee members and the committee agreed to provide feedback to Dale by December 16. Additional issues can be added to the list and RAP members are encouraged to provide input. The Board's Central Plateau priorities should incorporate as many HAB values and previous HAB advice as possible as related to the Central Plateau. Other committees will also likely want to get involved. The document could be posted to the Board SharePoint site so people can add their thoughts to one document. RAP members also requested the graphic provided by DOE outlining their priorities. The committee agreed this work may be the early stages of a larger, long-term project for RAP.

### **Committee Business\***

#### *Advice follow-up*

C. Several RAP members expressed concern about DOE's response to Board advice regarding 100 F (Advice #268). The advice included a lot of comments and stated a preference for Alternative 4 instead of

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DOE's preference for Alternative 2 because the preferred alternative includes Monitored Natural Attenuation (MNA). The Board believes additional efforts would increase the amount of remediation while decreasing the timeline for contamination. DOE accepted the Board's advice but will not deviate from their preferred alternative.

C. A number of Board members expressed concerned about how DOE and the regulators have been responding to recent Board advice. The Board does not feel their advice is being given due consideration.

C. It might be helpful for Board and agency representatives to have face-to-face discussions before the agencies issue responses or before the Board finalizes advice. In the past, the Board received draft letters outlining how the agencies intended to respond to advice.

C. RAP would like to have more open dialogue with the agencies to ensure that everyone understands the Board's position and concerns. Board advice is not useful if DOE only reiterates the reasoning behind why they are following a certain path.

C. [EPA] The agencies participate in committee meetings and have discussions with the Board. Both the Board and the agencies can feel as though the other party is not hearing what is being said. The agencies do not always feel as though the Board is listening to their rationale while the Board then believes that DOE is not being responsive to advice.

C. Whenever there are closed meetings where a range of alternatives are being specifically defined/designed, there should be a way for those interested stakeholders, like the Board, to understand the range of options and have a feedback loop. There should be an opportunity for a refined option or another option to be considered. Often, once formalized comment is solicited, the process is already so far along that it would be difficult to incorporate something completely different. There are more opportunities for meaningful input if interested groups are able to weigh-in early.

C. The issue just described has been long-standing with the Board. The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) implies that there should be opportunities for discussion with impacted stakeholders during remedy selection but sometimes that is not followed. The Board could ask to have a conversation about process. The Board could ask DOE to provide a briefing when CERCLA/NEPA decision documents are in the early draft alternatives phase; this early involvement would allow Board input to provide the greatest benefit in decision documents on cleanup.

C. [EPA] Documents change a lot through the drafting process. The Board should keep in mind that all draft documents are still being negotiated and assessed, which can be awkward to deal with when Board advice is received. It is challenging to respond to advice when documents do not have consensus and the agencies are still negotiating. Round Robin discussions are an extremely valuable feedback tool since Board members are all given an opportunity to share their opinions. These discussions give the agencies an opportunity to hear the breadth of ideas; some of which coalesce in synergy and some remain a minority opinion.

C. [EPA] Many federal facilities are set up to develop a RI/FS and Proposed Plan simultaneously. Once a list of alternatives has been evaluated, the lead agency starts to become invested in a selected preferred alternative. Separating the RI/FS from the Proposed Plan might help allow for some earlier involvement in remedy selection, although achieving that separation may be challenging since federal facilities nationwide follow this approach. CERCLA is not necessarily set up for a public comment period in the RI/FS.

C. One Board member suggested that future contracts be required to include a billable task that direct contractors to solicit input from the Board on draft alternatives, with a specific timeframe to respond, so that DOE could use the HAB comments to aid the screening process.

*R. Requesting specific line items between DOE and the contractors is beyond the scope of the Board's work.*

C. While Sounding Boards or Round Robins can be very helpful in expressing a variety of opinions, it is important that people have information ahead of time in order to inform their statements. Prior education on the issues is crucial.

C. The Board should draft some sort of document stating that public and tribal values are not being reflected in recent DOE responses to Board advice.

C. The Board can suggest a de-coupling of the RI/FS and Proposed Plan so the Board can offer advice earlier in the process. The Board may be able to offer advice on drafts before they are crafted into documents. Board values should be used to inform the entire process and the question is how the Board can insure that happens.

Hillary Johnson, EnviroIssues, suggested bringing the topic of advice responses and timely involvement forward for Executive Issue Committee (EIC) discussion, as this topic is important to the entire Board, not just RAP. RAP would like the EIC to consider the idea of when early involvement is appropriate and the timing that could have the greatest impact on decisions.

*Update issue manager table/assign issue managers to RAP topics on the HAB 2013-2014 Work Plan*

The committee reviewed the 2013-2014 HAB Work Plan and updated the issue managers assigned to each topic (Attachment 5). RAP also requested that additional members volunteer to take on the issue manager role. Draft advice is stronger when multiple people with differing opinions are involved.

*Update the 3-Month Work Plan*

RAP next updated the 3-month work plan (Attachment 6). A new format was being tried and feedback was requested. Committee members generally liked the new formatting but requested that holding bin topics be brought back to the table. Topics in the holding bin should be clearly tied to and a part of the 2014 HAB Work Plan and be given a general timeframe. Some committee members noted that the elimination of the holding bin was a decision based on the need to keep agendas reasonable and not overburden committees with an abundance of topics.

There are no committee meetings scheduled for December so the next RAP meeting would be proposed for January. Tentative topics for a potential January meeting include an update and discussion of possible advice development on 100 N and 100 F.

Issue managers for 100 N had starting developing concepts as a framework for potential advice, but the topic was deferred because the agencies indicated they were discussing draft documents further. RAP was told it would be timelier to wait on issuing any advice until after the agencies resolve their comments. If RAP thinks it might want to draft advice on the Draft A, January might be an appropriate time to continue discussions. RAP has held discussions about the strontium barrier and potential bioremediation using willows. RAP should make a decision on when and if any advice should be developed. EPA added that 100 N is an Ecology lead and Ecology has been working with DOE on comment resolution. The agencies might not be ready to offer a briefing in January so the topic could be kept as a placeholder pending agency confirmation. RAP would like to have a discussion about the 100 N RI/FS and Proposed Plan to make a determination on if advice is warranted and when that timing might be appropriate. February or March might be a more realistic timeline for receiving an agency update.

Committee members noted their discussion of early involvement and the desire to state concerns before decisions start to be formulated. EPA noted that the Board is requesting involvement before required under the CERCLA process. The purpose of the RI/FS is to determine the most feasible alternatives to consider. It would be very difficult to involve the Board in initial technology scoping and very difficult to implement any Board advice relating to initial technology consideration. There are opportunities to suggest additional technologies or alternatives that should be considered if they are not part of the proposed alternatives. RAP determined they would like to discuss the 100 N topic, even if the agencies do not have any new information to share during the January committee meeting. The committee will discuss their concerns and determine a path forward on potential advice. RAP members were also reminded that they held a Round Robin during the August meeting that was submitted to the agencies by Steve Hudson, Board chair. If RAP decides advice is warranted, it would likely need to be prepared for approval during the March Board meeting in order to be within the public involvement schedule.

Public comment on 100 F will likely begin in January, although there will probably be a request to extend the comment period so it would end in March. If the Board would like to issue advice on 100 F, January may be an appropriate time to hear a briefing and begin drafting potential advice. The conversation could continue into February. EPA felt the agencies would be ready to share information in January.

One RAP member noted that there are modifications out for several documents with public involvement opportunities. She suggested that the Board consult Ecology about their opinions and examine recommendations for the facilities. This topic is on the Board work plan. Revision 9 is not expected to be issued until sometime after 2014. Until Rev 9 is issued, DOE will be operating under the Rev 8 modifications. Several committee members noted that there are already many topics being discussed and there may not be time to address the modifications. Ecology added that there will be a public meeting on December 9 at the Richland Library to share information about these modifications after the public comment period. There will be an additional public comment period as well on other proposed

modifications. Jean Vanni and Dale both volunteered to look into the topic and share what they discover with the committee.

RAP decided not to hold a November committee call. The agencies will confirm the proposed January agenda topics and that agenda will be further refined during a December committee call, if needed.

**Attachments**

- Attachment 1: Transcribed flip chart notes
- Attachment 2: River Corridor Cleanup Progress
- Attachment 3: Update on Work in the River Corridor
- Attachment 4: Plutonium Finishing Plant Closure Project
- Attachment 5: Issue Manager Draft Concepts for Hanford Central Plateau Cleanup Priorities
- Attachment 6: Hanford Advisory Board FY2014 work plan – RAP Issue Mangers
- Attachment 7: RAP Committee 3-month work plan

**Attendees**

HAB Member and Alternates

Richard Bloom	Steve Hudson	Ed Revell
Shelley Cimon	Pam Larsen	Dan Serres (phone)
Dale Engstrom	Susan Leckband	Dick Smith (phone)
Gary Garnant	Jon Matthews	Bob Suyama
Laura Hanses	Liz Mattson	Gene Van Liew
Rebecca Holland	Maynard Plahuta	Jean Vanni
John Howieson	Gerry Pollet	Steve White

Others

Kim Ballinger, DOE-RL	Rick Bond, Ecology	Laura Cusack, CHPRC
Jon Peshong, DOE -RL	Alicia Boyd, Ecology	Moses Jaraysi, CHPRC
Larry Romine, DOE-RL	Madeleine Brown, Ecology	Dale McKennity, CHPRC
Tom Teynor, DOE-RL	Megan Walmsley, Ecology	Mike Swartz, CHPRC
	Larry Gadbois, EPA	Nicole Addington, EnviroIssues
	Emy Laija, EPA	Hillary Johnson, EnviroIssues
		Mark Freshley, PNNL
		Annette Cary, Tri-City Herald
		Michael Turner, MSA
		Tom Rogers, WA-DOH

		Peter Bengtson, WCH
		Don McBride, WCH
		Regina Lundgren (phone)