



FINAL MEETING SUMMARY

**HANFORD ADVISORY BOARD
TANK WASTE COMMITTEE**

June 19, 2018

Richland, WA

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

Opening

Steve Wiegman, Public at Large and Vice Chair of the Tank Waste Committee (TWC) welcomed committee members and introductions were made.

The February meeting minutes and April Committee of the Whole (COTW) meeting minutes were approved by consensus.

Announcements

There were no announcements made.

Waste Management Area C Draft Waste Incidental to Reprocessing

Agency Presentation

Steve Wiegman introduced the topic of the Waste Management Area C (WMA C) draft Waste Incidental to Reprocessing (WIR). Sherri Ross, Co-Chair of the Low-Level Waste Disposal Facilities Federal Review Group (LFRG) with the U.S. Department of Energy (DOE) of Environmental Management (EM), provided a presentation on the WIR evaluation of the WMA C.

Key points from Sherri's presentation¹:

- A WIR determination is a decision that waste is appropriate for management as non-high-level waste. Waste that is from the reprocessing of spent fuel is classified and managed as high-level waste. The draft WIR evaluation² is developed to demonstrate that the waste residuals and ancillary structures in the WMA C meet the WIR criteria to classify the waste as non-high-level waste. The tanks and ancillary structures will be filled with grout at the completion of waste retrieval activities.
- Regulatory processes for tank closure are comprised of multiple requirements in order to meet the stabilization phase.
- DOE has made other WIR determinations across the complex. Section 3116 determination was used at Savannah River Site (SRS) for the closure of six tanks and Idaho National Laboratory (INL) for the closure of 11 tanks. A WIR determination was used at West Valley Nuclear Waste Facility for the closure of two tanks.
- Section 3116 of the Ronald Reagan National Defense Authorization Act only applies to the states of South Carolina and Idaho. The DOE Order and Manual 435.1-1 Radioactive Waste Management³ applies to all other DOE sites and the WMA C draft WIR evaluation. These two methods use the same process and similar criteria to make all determinations.

¹ [Introduction to the Draft Waste Incidental to Reprocessing Evaluation](#)

² [Draft Waste Incidental to Reprocessing Evaluation](#)

³ [DOE Manual 435.1-1 Radioactive Waste Management Manual](#)

- DOE developed a WMA C Performance Assessment⁴, which is a reference document to the draft WIR evaluation. The performance assessment and the draft WIR evaluation have been published for public review and comments. The public comment period goes from June 4, 2018 through September 7, 2018. These documents have also been submitted to the Nuclear Regulatory Commission (NRC) for a review. The NRC will submit a Request for Additional Information (RAI) to DOE. DOE and the NRC will hold a public meeting regarding the NRC's RAI. DOE and NRC will hold a public meeting regarding DOE's response to the NRC's RAI prior to the NRC issuing a Technical Evaluation Report (TER). DOE will review the public comments and NRC TER prior to finalizing the WIR evaluation and issuing a WIR determination.
- The WIR criteria is based on the DOE Manual 435.1-1 Chapter II, section B(2)(a), which states that wastes determined to be incidental to reprocessing must meeting the following criteria:
 - Have been processed, or will be processed, to remove key radionuclides to the maximum extent that is technically and economically practical; and
 - Will be managed to meet safety requirements comparable to the performance objectives set out in 10 CFR Part 61, Subpart C, *Performance Objectives*; and
 - Are to be managed, pursuant to DOE's authority under the *Atomic Energy Act (AEA)*, in accordance with the provisions of Chapter IV of DOE Manual 435.1-1, provided the waste will be incorporated in a solid physical form at a concentration that does not exceed the applicable concentration limits for Class C low-level waste as set out in 10 CFR 61.55

Agency Perspective

Jeff Lyon, Washington State Department of Ecology (Ecology) provided his perspective on the WIR evaluation of the WMA C. Jeff stated that Ecology does have some concerns but are still reviewing all documents associated with the WIR. Jeff stated that DOE has acknowledged that the closure plan will be an integral part of closure process. Jeff noted that Ecology understands that it is the intent for DOE to close C Farm, so Ecology will be preparing as part of this assumption. He stated that Ecology is reviewing other documents and closure plans from DOE. Jeff stated that one of the nuances Ecology is trying to understand regarding appendix H. In appendix H there is an assumption that the NRC will consider both the tank residuals and soils in the closure evaluation. The NRC review is an important piece to the closure process.

Additional Perspective

Gerry Pollet, Heart of America Northwest (HOANW) and TWC member provided his perspective on the draft WIR evaluation process. Gerry introduced Angelo Marchesini and Drek Martin, Attorneys externing with HOANW. Drek noted that in prior court decisions regarding DOE Order 435.1 the Nuclear Waste Policy Act (NWPA) did not give DOE authority to establish alternative requirements. The NWPA's definition of high level waste for solids can be reclassified but liquids cannot. The 9th circuit court issued

⁴ [Performance Assessment of Waste Management Area C](#)

a reversal on the basis of ripeness. Angelo referenced Section 3115(e)(1), which states that nothing shall impair, alter, or modify the full implementation of any Federal Facility Agreement and Consent Order or other applicable consent decree for a DOE site. Ecology interprets the Tri-Party Agreement (TPA) standard for what is practical as 99% waste removal, while DOE states 96%. Angelo noted that Section 3115(e)(2) states that this section establishes any precedent or is binding on any state not covered by subsection (d). Angelo referenced the National Environmental Policy Act (NEPA) review which DOE states it is relying on existing NEPA Environmental Impact Statement (EIS) but hasn't included it in any formal notice.

Committee Member Questions (Q), Responses (R), and Comments (C):

Note: This section reflects individual questions, comments, and agency responses.

Q: "Why is DOE doing this WIR process now?"

R (DOE): "There are a lot of benefits to moving forward with the decision now. We need to address the legacy of the aging tanks. We don't want any more leaks and in order to do so we need to get these aging tanks stabilized to ensure no collapsing and leaking. This decision is limited. This decision is only for DOE to manage the waste as low level waste. This is not a closure plan, as we still need to address the state RCRA, TPA, and NEPA requirements before we can move forward with the end state of closure. The process will take a year or so before DOE can make a final decision."

Q: "*Were there facilities being considered for a WIR determination that we have chosen not to move forward?*"

R (DOE): "There are some facilities that are being considered but not as important at C tank farm at this time. This is a very public intensive process and we are learning from the public as we go."

C: "One of my biggest concerns are the soils underneath the tanks. They need to be addressed."

C: "My sense is that a lot of characterization work has been done with the soils, so we should know more about the soil contamination."

R: "(Chris Kemp, ORP): "There has been quite a bit of characterization done. It's a complex system. More than 101 pushes have been done over 7 acres. The pushes did not go beyond 200 feet deliberately in order to create a preferential path way. If we dug out C-200 tanks, that would equate to 38% of the contamination removed. Ecology approved a RCRA Facility Investigation and Corrective Measurement Study (RFICMS) with conditions associated with the study."

Q: "*Is it likely that you could proceed to do some form of stabilization of the tanks that does not preclude any remediation you might decide on the soils?*"

R (Ecology): "We tried to integrate all of our thought processes in appendix I, in order to help explain how we might make a decision. We did do a RFICMS and judgmental sampling. We did try to find contamination that was predicted but did not find any contamination. Ecology asked DOE to make some assumptions that may or may not be pessimistic bias. Ecology is putting all of the parts together for making a decision for closure plans. The closure plans have been submitted. DOE has this WIR process on the tank residuals and it's important for DOE to address what they will do with the soils. Having NRC

review the WIR and closure plans is very important. Ecology is looking into all of the information than just the WIR. The issue manager team should be looking into all of the information before proceeding.”

C: “In reference to slide five of the presentation that list all of the processes, we want to make sure that nothing is forgotten during this process.”

C: “I have been following the WIR since it started years ago. The WIR has already been done on the soils. DOE has already classified the soils as low-level waste. DOE is going to have to prepare for the legal fight. According to the NWPA, all liquids leaked into the ground are considered high level waste. There are documents on the web that prove it. All transfer lines need to be removed, but as far as the tanks they can be grouted.”

R (DOE): “I want to clarify that comment by saying that DOE has not a WIR determination on the soils. We have done the citation process on the soils, which is not the same as a WIR determination.”

Q: “It was mentioned that there would be several public meetings throughout the WIR process. Where will these public meetings be held?”

R: “They will be here in the Tri-Cities.”

C (David Esh, NRC): “We are willing to come and speak to the HAB when the public meetings do occur. NRC will get to review any comments that are received during the public comment period. The public comment timeframe is in parallel with the NRC review timeframe, so it would be helpful to view those comments earlier during our review.”

Q: “Will the review of the WIR include the soils?”

R (NRC): “No, that is not included in our review.”

R (Ecology): “In appendix H of the TPA, there is a process that addresses retrieval of the tanks and how decisions are made for closure. In that same clause there is a step that states NRC will address the soils and tank residuals for a closure plan. It’s not a process, but more of a step in the closure process.”

C: “When we get to the closure plan tier one and we don’t know what’s in the soils now, then how can we possibly know if the residuals going into the soils will make an impact? This is my concern, as we need to deal with what is in the soils.”

C: “Appendix H is focused on retrieval. The focus is the retrieval issue and does not addresses the closure process. The NRC doesn’t examine contamination at Hanford. NRC has a role under the TPA and WIR for evaluating the residuals in the tanks. It refers to the residuals in the soils but appendix I reverts back to the RCRA process. I think it’s inappropriate for us to confuse those two. I ask Ecology to link all of the C Farm related documents into all of the C Farm decisions for everyone to see.”

Next Steps: An Issue Manager team was formed with Steve Wiegman, Jeff Burrright, Shelley Cimon, Dave Rowland, Gerry Pollet, Vince Panesko, Bob Suyama, and Amoret Bunn as the lead Issue Manager. An Issue Manager call was scheduled for Tuesday, July 10, 2018 at 9:00 a.m.

John Price Challenge

Steve Wiegman introduced the topic of the “John Price” challenge⁵. Steve noted that John Price, Ecology challenged the HAB to provide the TPA agencies with a preferred scenario based on the System Plan 8.

Jeff Burreight, Oregon DOE provided a brief synopsis of how the “John Price” challenge has evolved from the March Board meeting. Jeff noted that because Ecology and ORP were in negotiations, it is possible that this challenge can be used for the next System Plan. Jeff stated that it is the intention of the Issue Manager team to provide a response to Ecology at the September Board meeting. The Issue Manager team has not decided on a format to provide a response, but it’s possible that a sound board may be the best avenue to deliver the response to Ecology.

Jeff stated that the COTW meeting provided the TWC an enhanced vision of reality for some base assumptions than what the System Plan 8 showed. Jeff noted that the Issue Manager team came up with five common base assumptions and four scenario components for the preferred scenario(s). Jeff provided a detailed overview of each line item.

Agency Perspective

Dan McDonald, Ecology provided his perspective on the “John Price” challenge. Dan stated that the idea of proposing something by September would be ideal but consider providing input on System Plan 9. We should be starting the process of planning System Plan 9 in March 2019. Dan noted that the Issue Manager team should consider the cost associated with the preferred scenario(s), including the amount of time and reasonable resources it will take to accomplish it. He stated that System Plan 8 takes into consideration the cost, scope, and schedule associated with each of the scenarios. He suggested that the team should consider the reality while creating a preferred scenario(s).

Kaylin Burnett, DOE Office of River Protection (ORP) stated that in appendix B of System Plan 8 provides a detailed set of assumptions. Kaylin noted that building a scenario can be difficult if the scenario is generic. He stated that for System Plan 8, the agencies considered the cost and schedule. Kaylin stated that the team should consider the type of information they are seeking while building the preferred scenario(s).

Committee Member Questions (Q), Responses (R), and Comments (C):

Note: This section reflects individual questions, comments, and agency responses.

Q: “Did the agencies receive our advice on System Plan 8 and when will we see the response?”

R: “Yes the agencies received your advice and a response has been issued. It should make it your way once all signatures have been received.”

Q: “So will the agencies be developing assumption for System Plan 9 in March 2019?”

⁵ [Draft Hanford Advisory Board Response to the “Price Challenge”](#)

R (ORP): “No. We will start selecting scenarios in March 2019, which requires documentation by October 2019. Once those scenarios have been selected and documented, we will start the balance of assumptions and modeling.”

R (Ecology): “We have to have a fair description of the scenarios in order to know what assumptions to apply to that scenario.”

C: “The challenge given to us was to pick and choose what was already on offer for System Plan 8, so while that would be something that we like to entertain for System Plan 9, it is outside of the scope for the challenge that was given to us.”

R (ORP): “I looked at the scenario the team has put together and thought it was a good job to start with. There is a lot of information you get from a scenario no matter what the details of the scenario. The team should set up your scenario how you want it like John Price suggested. We look at the past System Plans to compare for the new System Plan.”

Q: “Do you see the willingness of ORP to run a scenario that the HAB provides?”

R (ORP): “As part of a requirement in the TPA we would consider the input as the development of the scenarios, but it may not be put into the actual System Plan.”

C: “It would be helpful to understand if our scenario is appropriate or missing something.”

C: “There needs to be sufficient time to vet the Tank-Side Cesium Removal (TSCR) system.”

Q: “Where is risk in all of these scenarios?”

R (Ecology): “It could be said that time, value, and risk grow as time goes on. Risk is predicted and how much predicted risk is the community willing to accept. If the time is too far down the road and risk is too great, then the scope will need to be changed.”

Q: “Isn’t the modeling about cost and schedule not including risk?”

R (ORP): “The only thing that the modeling accounts for is the schedule. After the schedule the cost will be determined. If a limited cost profile is established then the scope is reduced in order to anticipate the cost.”

R (Ecology): “If you look at cost, scope, and schedule as each point of a triangle and something changes, then the whole triangle changes. Unless there is a huge change in scope, the scope is the scope. If its flat funded the only thing that can change is the schedule.”

Q: “What about risks?”

R (ORP): “Risk is in the scenario not the modeling.”

C: “When we talk about C Farm closure and dome collapses. The domes can collapse at any time. Is that not higher risk than a tank that has been empty? I think it would be. If it comes down to cost, then I would rather see the tank pumped before the empty ones are grouted.”

C: “The reality is if you set up all the infrastructure and set it up to retrieve one tank, then the return of investment is not as high as if you retrieve six tanks.”

C: “For the assumption that includes flat funding, I want to see it as a scenario to be considered, but not necessarily a preferred scenario.”

R(Ecology): “So are you wanting to see a scenario that includes all of the funding needed and flat funding.”

C: “Yes. It is important to have the flat funding scenario and the what-if scenarios.”

R: “What are the questions you want answered in your preferred scenario? That’s how you should approach it. We can adjust the modeling to answer those questions.”

C: “What we should be asking is what happens if you have a failure and how long will it take to get back to operational readiness?”

C: “We are very full in tank space, so that’s one thing we need to take into consideration with the preferred scenario(s).”

C: “The challenge that I am having with this activity, is that the original intent was to be involved in the process. I don’t even know that we are going to get anything out of this, as we are putting into it. We were asked to be involved, so are we going to be involved or are we only going to be given one shot at this.”

R (ORP): “Our intent is to allow you to be involved to the limit that we are allowed to within the TPA, but that is with offering advice.”

Q: “Is there a quantitative analysis of the risks for these scenarios? I think this would be useful for the next meeting.”

C: “I assumed that transuranic waste would go to an offsite disposal facility like permafex.”

R: “That is not true. You’re thinking of low activity waste (LAW), which is a different topic.”

Next Steps: The TWC will continue the conversation at the next committee meeting on August 8, 2018 to determine a path forward.

Tank Integrity Update

Agency Presentation

Steve Wiegman introduced Jeremy Johnson, ORP who presented an update on the Hanford Tank Integrity Program.

Key points from Jeremy's presentation⁶:

- The primary objective of the Tank Integrity Program is to ensure the tanks maintain their integrity and safely store waste. The goal of the program is to monitor the integrity of the tank including corrosion in order to inform management decisions.
- The scope of the integrity program consists of visual and video inspections of the primary tank wall and annulus floor. This occurs every three years. Ultrasonic inspections are completed every 10 years using an ultrasonic testing (UT) crawler. Corrosion testing of tank waste is conducted using the Waste chemistry corrosion control lab testing. Periodic waste sampling and adjust accordingly to ensure the waste is maintained within the chemistry operating controls. Structural analyses are conducted for the double shell tanks (DSTs). Periodic testing and integrity assessments are conducted on other facilities.
- Through an analysis of tanks AY-101, AZ-101, and AZ-102, it was determined that these tanks may have held waste with similar chemistry as the AY-102 waste. The results of the analysis do not indicate any of the DSTs are currently leaking, or will leak, but the following actions are being taken.
 - Evaluating available information to assess possible implications for other tanks.
 - Performing core sampling of tank bottom layers to evaluate local conditions.
 - Revising chemistry control testing and program to improve protection against pitting corrosion.
 - Developing tank bottom inspection tool to provide visual volumetric examination capability.
 - Identify additional characterization needs and to develop strategies to minimize the risk of leakage.
- UT was conducted on AY-101 this year, which identified new Liquid to Air Interface (LAI) corrosion. It is believed that the increased degradation is caused by the condensation from the AY and AZ ventilation systems. A visual inspection was performed along with waste sampling operations for AY-101 and AZ-102, including recirculation. Tank AZ-102 UT has been accelerated into Fiscal Year (FY) 2018. Near term changes to operations have been made due to the corrosion results found. A tanker truck is now being used to transfer the condensate water to the Effluent Treatment Facility (ETF).
- For the past few years, there have been UT scans of the secondary liner wall and annulus floor in some of the tanks to determine if there is significant thinning of the secondary liner, as recommended by the Tank Integrity Expert Panel (TIEP). It was determined that the secondary liner may be exposed to moisture, which can cause corrosion. As a result of the testing, 9 of the 11 tanks show a reduction from nominal. Actions will be taken to ensure the protection of the

⁶ [Hanford Tank Integrity Program](#)

DST secondary liner to prevent water accumulation, as the water can be corrosive. An evaluation will be done to determine if a corrosion inhibitor can be used in the future.

- The TIEP is comprised of industry experts and members from private and government organizations. The TIEP meets annually to discuss emerging issues on the program and provides recommendations on tank integrity issues. The next TIEP meeting was held in the Tri-Cities on June 27 & 28, 2018.
- Independent, Qualified, Registered Professional Engineer (IQRPE) assessments are performed periodically in addition to the ongoing integrity programs. In 2016 an IQRPE report was issued with no findings reported. It was determined that the DST system is fit for use with a reassessment in 2026.

Agency Perspective

Steve Lowe, DST Engineer for Ecology provided his perspective on the Tank Integrity Program. Steve stated that ORP is doing a great job with developing a good understanding with tank chemistry. He noted that ORP has developed a great response to issues that may arise. Steve stated that when the vitrification plant starts up in 2021 and is expected to operate for 40 years, which would make the existing tanks almost 100 years old. He believes that new DSTs need to be built in order to keep up with the vitrification plant operations.

Committee Member Questions (Q), Responses (R), and Comments (C):

Note: This section reflects individual questions, comments, and agency responses.

Q: “What would we do differently if we built additional storage? Is there a simpler way to build a tank that is better and more efficient than the existing tank design?”

R (Ecology): “It might not be underground. It might have a bottom drain. We need to start having the discussion.”

Q: “Are you thinking that way now?”

R (ORP): “If you look at what takes up a majority of our DST space is the liquid waste. The sooner we can get the Direct Feed Low Activity Waste (DFLAW) system up and running, the sooner we will create DST space. If we design a tank today it probably won’t by the same design used for the existing tanks.”

Q: “Are there considerations for batching? Wouldn’t you need tanks for batch feed for LAW?”

R (ORP): “We plan to use the existing AP tanks for the batching and other smaller scale tanks within the LAW facility.”

Q: “If during a process where we have leaks in the primary liner, will you rely on the secondary liner?”

R (ORP): “I would assume we would rely on the secondary to contain waste until it can be managed.”

Q: “How often are you characterizing the waste? What kind of schedule are they on?”

R (ORP): “It depends on how much activity the tank is getting.”

Q: “So can they sit for long time?”

R (ORP): “We do have a plan frequency for every 5 to 7 years the tanks are evaluated to determine if the sampling needs to happen.”

Q: “What does it cost to adjust the chemistry in the waste?”

R (ORP): “I wouldn’t say it’s overly expensive, but at the same time you don’t want to be too conservative in how much caustic you add.”

Q: “Do you have a sense of how long it would take to build a new tank?”

R (ORP): “It’s certainly not overnight. You are looking at a few years.”

R (Ecology): “You have to take into consideration the permitting aspects of the project, which could last a couple of years.”

Q: “Can’t the permitting be done ahead of time?”

R (ORP): “I don’t have a good answer for what it would take to build a new DST. I will say that we do have DST space right now.”

R (Ecology): “We believe DOE would need at least seven years to build new DST. It would take another three years to permit before construction can start. When we talk about DST space, the evaporator concentrates the liquids in the tanks, so there is still an opportunity to transfer the waste. Availability is another issue. The West area only have three DSTs. There is a lot of space if you don’t retrieve tanks but if you want them to retrieve the tanks then you won’t have space.”

R (ORP): “Were very close to starting up DFLAW and in the first few years of the mission, we will be creating the space needed in DST. It makes sense to keep the focus on DFLAW.”

Q: “What’s the status of the cross-site transfer line?”

R (ORP): “The slurry line has never been commissioned. The supernate line was used at one point but has not been used in years. This year, there has been some work done to energize the cross-site transfer line system and troubleshoot for any issues. We are in the process of reactivating the supernate line.”

Double-Shell Tank Proposed Advice

Steve Wiegman introduced the draft Double-Shell Tank proposed advice⁷.

Members took the opportunity to read through the draft advice paragraph by paragraph to ensure the advice is relevant and factual. Upon minor grammatical edits and verbiage changes, members determined that Jeff Burright, TWC member will take the lead on incorporating additional recommended changes to the advice in preparation for the next TWC meeting.

⁷ [Draft Double-Shell Tank Proposed Advice](#)

Committee Member Questions (Q), Responses (R), and Comments (C):

Note: This section reflects individual questions, comments, and agency responses.

Q: “Are we going to wordsmith this advice now?”

R: “Yes. We have some extra time so it may be beneficial to do some of the wordsmithing now.”

Q: “Since the advice was drafted before the COTW and Tank Integrity Program update, will this advice be changing?”

R: “Yes, but we are not there yet.”

Next Steps: Jeff Burrigh, Issue Manager will incorporate recommended changes as discussed by the committee. Incorporated changes will be sent to Bob Suyama, TWC Chair for further review. Draft advice will be reviewed and approved by committee to move forward to the September Board meeting at the proposed August TWC meeting.

Attachments

Attachment 1: Introduction to the WIR Evaluation for WMA C

Attachment 2: Draft Hanford Advisory Board Response to the “Price Challenge”

Attachment 3: Hanford Tank Integrity Program

Attachment 4: Draft Double-Shell Tank Failures Advice

Attendees

Board Members and Alternates:

Steve Wiegman, Alternate	Dave Rowland, Alternate	Shelley Cimon, Member
Tom Carpenter, Alternate	Paige Knight, Member	Alex Klementiev, Alternate
Amoret Bunn, Alternate	Gerry Pollet, Alternate	Dan Solitz, Alternate (Phone)
Pam Larsen, Member (Phone)	Liz Mattson, Member (Phone)	

Others:

David Esh, U.S. NRC	Matt Kozak, INTERA	Echo Dahl, Northwind – Supporting ORP
Chris Kemp, ORP	Sherri Ross, DOE EM	Theresa Howell, Ecology
Gary Byles, ORP	Doug DeFord, WRPS	Jim Alzheimer, Ecology

Jeffery Lyon, Ecology	James Lynch, ORP	Mark McKenna, WRPS
George Rangel, WTP	Ginger Wireman, Ecology	Dieter Bohrmann, Northwind – Supporting ORP
Angelo Marchesini	Drek Martin	Kaylin Burnett, ORP
Dan McDonald, Ecology	Jeremy Johnson, ORP	Steve Lowe, Ecology
John Britton, WRPS	Michaela Trinidad, Bechtel	Eric Van Mason, WRPS
Ruben Mendoza, WRPS	Jay Decker, Ecology	Annette Cary (Phone)
Michael Turner (Phone)	Paula Call (Phone)	Melissa Amaro, ProSidian Consulting
Lindsay Strasser, ProSidian Consulting		