



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

15-ESQ-0063

APR 23 2015

Ms. J. A. Hedges, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Ms. Hedges:

**SUBMITTAL OF THE STATE ENVIRONMENTAL PROTECTION ACT (SEPA)
ENVIRONMENTAL CHECKLIST, REVISION 3, FOR THE WASTE ENCAPSULATION
AND STORAGE FACILITY (WESF) STABILIZATION PROJECT**

This letter is transmitting the U.S. Department of Energy Richland Operations Office SEPA Environmental Checklist for the WESF Project, Revision 3. The SEPA Environmental Checklist for WESF was revised to identify potential environmental impacts from the upcoming stabilization activities for WESF.

The signed SEPA Environmental Checklist is enclosed. This completed checklist incorporates comments received from Melinda Brown of your staff.

If you have any questions, please contact me, or your staff may contact Jeffrey A. Frey, Acting Assistant Manager for Safety and Environment on (509) 376-7727.

Sincerely,

A handwritten signature in cursive script that reads "Stacy Charboneau".

Stacy Charboneau
Manager

ESQ:ACM

Enclosure

cc: See page 2

Ms. J. A. Hedges
15-ESQ-0063

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cc w/encl:

Administrative Record, TSD: S-2-10
Ecology NWP Library
Environmental Portal, LMSI, A3-95
HF Operating Record (J. K. Perry, MSA, A3-01)

cc w/o encl:

B. Bohnee, NPT
M. J. Brown, Ecology
A. S. Carlson, Ecology
L. J. Cusack, CHPRC
S. L. Dahl-Crumpler, Ecology
L. M. Dittmer, CHPRC
B. J. Dixon, CHPRC
R. H. Engelmann, CHPRC
D. L. Flyckt, CHPRC
M. T. Gillespie, CHPRC
S. Harris, CTUIR
M. N Jaraysi, CHPRC
R. Jim, YN
J. L. Pennock, CHPRC
J. B. Price, Ecology
S. N. Schleif, Ecology
C. J. Simiele, CHPRC
D. J. Watson, CHPRC
K. A. Wooley, CHPRC

**STATE ENVIRONMENTAL POLICY ACT OF 1971
ENVIRONMENTAL CHECKLIST**

FOR

**HANFORD FACILITY
WASTE ENCAPSULATION AND STORAGE FACILITY STABILIZATION
PROJECT**

REVISION 3

APRIL 2015

**WASHINGTON ADMINISTRATIVE CODE
ENVIRONMENTAL CHECKLIST
[WAC 197-11-960]**

A. BACKGROUND

1. Name of proposed project, if applicable:

This *State Environmental Policy Act of 1971* (SEPA) Environmental Checklist is being submitted for Hanford Facility Waste Encapsulation and Storage Facility (WESF) Stabilization and Ventilation Project (W-130). The project includes the shutdown and isolation of the existing K3 exhaust ventilation system, the startup of the new K3N ventilation system, and the stabilization of legacy contamination within WESF hot cells A-F. The scope of this SEPA checklist is limited to the stabilization activities.

The proposed radioactive emissions ventilation upgrade activities are categorically exempt from the requirements of SEPA according to WAC 197-11-845, "SEPA Rules," "Department of Social and Health Services and Department of Health," which exempts most actions by the Washington Department of Health and is consistent with the exemption of actions on air operating permits provided by RCW 43.21C.0381, "State Environmental Policy."

WESF was constructed and is owned and operated by the U.S. Department of Energy, Richland Operations Office (RL) and co-operated by its contractors.

2. Name of applicant:

RL

3. Address and phone number of applicant and contact person:

U.S. Department of Energy
Richland Operations Office
P.O. Box 550 Richland,
WA 99352

Contact:

Stacy Charboneau, Manager
Richland Operations Office
509-376-7395

4. Date checklist prepared:

March 2015

5. Agency requesting checklist:

Washington State Department of Ecology
Nuclear Waste Program
3100 Port of Benton Boulevard Richland,
WA 99354

6. Proposed timing or schedule (including phasing, if applicable):

The physical work to support the WESF stabilization of legacy contamination (core drilling through the building walls, adding grout into the hot cells) is planned to begin in October 2015, and will continue into calendar year 2017.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

Yes. A new stack and exhaust system are planned, and WESF will continue to operate for miscellaneous storage. Future activities related to the cesium and strontium capsules currently stored at WESF are identified in DOE/EIS-0391, *Final Tank Closure and Waste Management Environmental Impact Statement for the Hanford Site, Richland, WA*, December 2012.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

Revision 0 of the WESF SEPA Environmental Checklist (July 1997) was submitted with the Notice of Intent to submit the Part A permit application for miscellaneous storage at WESF.

Revision 1 of the WESF SEPA Environmental Checklist (August 2006) was submitted to the Washington State Department of Ecology (Ecology) concurrently with the final, certified Part B Permit Application for WESF (Letter, 06-AMCP-0268, Keith Klein, RL, to Jane Hedges, Ecology, "Submittal of the Hanford Facility Dangerous Waste Permit Application, Revision 0 and Approval of the State Environmental Protection Act (SEPA) Environmental Checklist, Revision 1 for the Waste Encapsulation and Storage Facility (WESF) (TSD: S-2-10," dated August 28, 2006).

Revision 2 of the WESF SEPA Environmental Checklist (May 2011) incorporated informal comments received from Ecology, and was submitted to Ecology to support preparation/issuance of the draft *Resource Conservation and Recovery Act of 1976 (RCRA) Permit, Revision 9* (Letter, 11-AMCP-0098, Matt McCormick, RL, to Jane Hedges, Ecology, "Reissue – State Environmental Policy Act of 1971 (SEPA) Environmental Checklists Supporting Preparation/Issuance of the Draft Hanford Facility Resource Conservation and Recovery Act Permit, Revision 9," dated May 20, 2011).

National Environmental Policy Act of 1969 (NEPA) documentation pertaining to WESF includes the following:

- DOE/EIS-0113, *Final Environmental Impact Statement; Disposal of Hanford Defense High-Level, Transuranic and Tank Wastes*, December 1987
- DOE/EIS-0189F, *Final Environmental Impact Statement for the Tank Waste Remediation System, Richland, Washington*, August 1996
- DOE/EIS-0391, *Final Tank Closure and Waste Management Environmental Impact Statement for the Hanford Site, Richland, WA*, December 2012
- DOE/EA-0942, *Environmental Assessment; Return of Isotope Capsules to the Waste Encapsulation and Storage Facility, Hanford Site, Richland, Washington*, March 1992

General information concerning the Hanford Facility environment can be found in the *Hanford Site National Environmental Policy Act (NEPA) Characterization*, PNNL-6415 (latest revision), and DOE/EIS-0391, *Final TC&WM EIS for the Hanford Site, Richland, Washington* (December 2012). These documents provide current information concerning climate and meteorology, ecology, history and archeology, socioeconomic, land use and noise levels, and geology and hydrology. These provide

baseline data for the Hanford Site and past activities, and are useful for evaluating proposed activities and their potential environmental impacts.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

No other applications are pending at this time.

10. List any government approvals or permits that will be needed for your proposal, if known.

Ecology is the lead agency authorized to approve the WESF Stabilization SEPA checklist pursuant to the requirements of WAC 197-11-960.

The Washington Department of Health will issue a radioactive air emissions license for the ventilation upgrades necessary to complete the stabilization activities.

Ecology is the lead agency authorized to approve the revised RCRA permit Part A and closure plan. A temporary authorization to conduct specific activities (physical changes to the treatment, storage, and disposal [TSD] components and grouting of the hot cells) prior to permit issuance may be needed to support the project schedule.

11. Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

WESF is an Operating Facility. Activities in this project applicable to this checklist include stabilizing contamination in the old K3 filter pit, the old K3 duct and trench, the A-Cell airlock, and Hot Cells A through F in WESF. In addition to fixing contamination, the hot pipe trench will be filled with grout to ensure structural stability in the areas to be grouted that are above it. This will immobilize the bulk of the legacy radioactive contamination in the facility.

Penetrations of the WESF hot cells are expected to be needed to enable placement of the grout. Grout will be prepared offsite and trucked to WESF. Grout delivery will follow this general routing:

- From the grout pump, through the truck port, and into WESF for stabilizing the hot pipe trench
- From the grout pump, through the truck port, and up to the wall penetration for access into the Hot Cell A air lock
- From the grout pump, into the truck port, up through the floor opening into the WESF Canyon, and along the WESF Canyon floor to access hot cells.

A temporary washout pit will be set up near the grout pump and truck delivery location to contain rinsate from the delivery trucks and grout pump.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic

map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

WESF is located north of the city of Richland, Washington, in the 200 East Area of the Hanford Site.

Topographic maps and site plans are included in the original submittal and subsequent updates of DOE/RL-2006-35, *Hanford Facility Dangerous Waste Permit Application, Waste Encapsulation and Storage Facility*, September 2007.

B. ENVIRONMENTAL ELEMENTS

1. Earth

- a. **General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other**

Flat.

- b. **What is the steepest slope on the site (approximate percent slope)?**

The approximate slope of the land is less than 2 percent.

- c. **What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.**

The project will not affect any soil in the area.

- d. **Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.**

No.

- e. **Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.**

Site development generally is complete; no filling or grading is expected.

- f. **Could erosion occur as a result of clearing, construction, or use? If so, generally describe.**

No.

- g. **About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?**

No additional impervious surfaces will be constructed as part of this project.

- h. **Proposed measures to reduce or control erosion, or other impacts to the earth, if any:**

None.

2. Air

- a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.**

Minor amounts of emissions would be generated from the construction equipment and vehicles used by personnel to gain access to WESF. Diffuse and fugitive air emissions originating from operations are controlled and permitted pursuant to conditions set forth in the Hanford Site Air Operating Permit.

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.**

No.

- c. Proposed measures to reduce or control emissions or other impacts to air, if any:**

Good engineering practices would be followed, and actions would comply with onsite procedures designed to protect the environment and personnel safety and health. Radioactive air emissions are not subject to SEPA; controls will be addressed through other permitting processes.

3. Water

- a. Surface Water:**

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

No. The Columbia River is located to the north and east of the 200 Area; however, WESF is not a land-based disposal facility. WESF is located more than 11 km (6.8 mi) from the Columbia River.

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) of the described waters? If yes, please describe and attach available plans.**

No.

- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and**

indicate the area of the site that would be affected. Indicate the source of fill material.

None.

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.**

No.

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.**

No.

- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

No.

b. Groundwater:

- 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses, and approximate quantities withdrawn from the well? Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.**

No.

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

The project will not affect groundwater.

c. Water runoff (including stormwater):

- 1) Describe the source of runoff (including stormwater) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

The project will not affect stormwater runoff.

2) Could waste materials enter ground or surface waters? If so, generally describe.

The management of wastewater from rinsing off construction equipment will follow appropriate Pollution Prevention and Best Management Practices described in Categorical State Waste Discharge Permit Number ST0004511 (Permit). This Permit is in effect until December 31, 2019. Rinsate from rinsing the construction equipment is exempt as identified in Section G12 of the Permit, *Wastewater Discharge Stream Exemptions*, exemption G12.F.

No waste materials will enter ground or surface waters.

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:

Measures would involve best management practices, including routine inspections.

4. Plants

a. Check or circle types of vegetation found on the site:

- deciduous tree: alder, maple, aspen,
- other evergreen tree: fir, cedar, pine,
- other shrubs grass pasture crop or
- grain wet soil plants: cattail, buttercup,
- bullrush, skunk cabbage, other water
- plants: water lily, eelgrass, milfoil, other
- other types of vegetation
-
-

None.

b. What kind and amount of vegetation will be removed or altered?

The proposed activities will not affect vegetation.

c. List threatened or endangered species known to be on or near the site.

Proposed activities will not affect vegetation; therefore, no listed plant species will be affected.

- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:**

None.

5. Animals

- a. List any birds and animals that have been observed on or near the site or are known to be on or near the site:**

birds: raptors (redtail and Swainson's hawks) and songbirds mammals: not applicable

Proposed activities will not directly affect animals. DOE practices will be employed to ensure compliance with the *Migratory Bird Treaty Act of 1918* and in line with the guidance provided in the Memorandum of Understanding between DOE and the U.S. Fish and Wildlife Service per Executive Order 13186, *Responsibilities of Federal Agencies to Protect Migratory Birds*.

- b. List any threatened or endangered species known to be on or near the site.**

See response to 5a.

- c. Is the site part of a migration route? If so, explain.**

See response to 5a.

- d. Proposed measures to preserve or enhance wildlife, if any:**

See response to 5a.

- e. List any invasive animal species known to be on or near the site.**

See response to 5a.

6. Energy and natural resources

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.**

Diesel fuel, gasoline, and oil are used for operations equipment. The grout will be delivered in diesel trucks. A backup diesel generator will be onsite during the project. Oil and gas will be used in the construction equipment. Electric fans/fan motors will be used during the core drilling into the building for access and grouting of the hot cells.

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.**

No.

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:**

None.

7. Environmental health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, describe.**

No, such an event would be highly unlikely.

- 1) Describe any known or possible contamination at the site from present or past uses.**

WESF contains high levels of radioactive contamination from historical processes.

- 2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

None.

- 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

None.

- 4) Describe special emergency services that might be required.**

None.

- 5) Proposed measures to reduce or control environmental health hazards, if any:**

All personnel are trained to follow proper procedures during WESF stabilization activities to minimize potential exposure.

b. Noise

1) What types of noise exist in the area that may affect your project (for example: traffic, equipment, operation, other)?

While there is a minor amount of traffic, operation, and equipment noise in the vicinity, there would be no effect to personnel at WESF.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Minor amounts of normal construction noise, short duration use of heavy equipment (e.g., core drilling, grout truck traffic, grout pumping) are expected during this project, and would not be detectable off the Hanford Site.

3) Proposed measures to reduce or control noise impacts, if any:

Noise levels are not substantial or incompatible with activities in the industrial area; noise reduction measures are not necessary.

8. Land and shoreline use

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

WESF is used to store cesium and strontium capsules in pools inside the facility. This project will not affect existing or adjacent land uses.

b. Has the site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

Not applicable.

Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

No portion of the 200 Area has been used for agricultural purposes since 1943.

c. Describe any structures on the site.

WESF is located in the 200 East Area of the Hanford Site and includes numerous buildings and structures (refer to Section A.11).

d. Will any structures be demolished? If so, what?

No.

e. What is the current zoning classification of the site?

Not applicable.

f. What is the current comprehensive plan designation of the site?

The "Record of Decision: Hanford Comprehensive Land-Use Plan Environmental Impact Statement (HCP EIS)" (64 FR 61615) stated that the Central Plateau (200 Area) geographic area is designated Industrial-Exclusive.

g. If applicable, what is the current shoreline master program designation of the site?

Not applicable.

h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.

No.

i. Approximately how many people would reside or work in the completed project?

No people reside at WESF. Approximately 25 people are involved in day-to-day operations of WESF.

j. Approximately how many people would the completed project displace?

None.

k. Proposed measures to avoid or reduce displacement impacts, if any:

Not applicable.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

Not applicable (refer to Section B.8.f).

9. Housing

- a. Approximately how many units would be provided, if any?
Indicate whether high, middle, or low-income housing.**

Not applicable.

- b. Approximately how many units, if any, would be eliminated?
Indicate whether high, middle, or low-income housing.**

Not applicable.

- c. Proposed measures to reduce or control housing impacts, if any:**

Not applicable.

10. Aesthetics

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

No new structures are being proposed.

- b. What views in the immediate vicinity would be altered or obstructed?**

None.

- c. Proposed measures to reduce or control aesthetic impacts, if any:**

None.

11. Light and glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?**

None, the activities will occur during daylight.

- b. Could light or glare from the finished project be a safety hazard or interfere with views?**

No.

- c. What existing offsite sources of light or glare may affect your proposal?**

None.

- d. Proposed measures to reduce or control light and glare impacts, if any:**

None.

12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity?**

None.

- b. Would the proposed project displace any existing recreational uses? If so, describe.**

No.

- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:**

Not applicable.

13. Historic and cultural preservation

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? If so, specifically describe.**

No places or objects listed on or proposed for national, state, or local preservation registers are known to be next to WESF. WESF has been determined to be eligible for the National Register of Historic Places as a contributing property in the Manhattan Project/Cold War Historic District.

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation. This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

See response to B.13.a.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.**

Work that involves building modifications to potential historic resources requires assessment. The WESF is identified in DOE/RL97-56, *Hanford Site Manhattan Project and Cold War Era Historic District Treatment Plan*, as requiring individual documentation, so a cultural resources review was initiated. It was completed in January 2015 (HCRC# 2015-200-014), and determined that no impacts to cultural resources are anticipated from the stabilization activities at WESF.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.**

Not applicable; see response to B.13.a.

14. Transportation

- a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.**

Not applicable.

- b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?**

The Hanford Site is not accessible to the public or served by public transit. It is approximately 40 km (25 mi) to the city of Richland with the nearest transit stop.

- c. How many additional parking spaces would the completed project have? How many would the project eliminate?**

This proposal will not affect the existing parking lot at WESF.

- d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).**

No.

- e. **Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

No.

- f. **How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?**

This proposal does not increase the peak traffic volumes; the number of vehicular trips would remain at the present rate.

- g. **Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

Not applicable.

- h. **Proposed measures to reduce or control transportation impacts, if any:**

None.

15. Public services

- a. **Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.**

No.

- b. **Proposed measures to reduce or control direct impacts on public services, if any.**

Not applicable.

16. Utilities

- a. **List utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.**

Water is supplied to WESF from the Columbia River via the Hanford Site water distribution system. A septic tank and drain field provide for disposal of sanitary waste from restrooms, change rooms, and showers. WESF electrical substation ties to a 13.8 kV electrical line.

- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities that might be needed on the site or in the immediate vicinity.**

No new utilities are proposed for WESF.

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:

Stacy Charboneau

Stacy Charboneau, Manager
U.S. Department of Energy, Richland Operations Office

Date Submitted:

4/23/15
