

Distribution

Unit Managers' Meeting: 100 Areas Remedial Action Unit/Source Operable Units

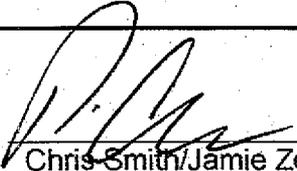
Rudy Guercia.....	DOE-RL, RP (A6-38)
Mary Jarvis	DOE-RL, RP (A5-14)
Hector Rodriguez	DOE-RL, RP (A5-15)
Chris Smith	DOE-RL, RP (A3-04)
Mike Thompson	DOE-RL, RP (A6-38)
Arlene Tortoso	DOE-RL, RP (A6-38)
Kent Westover	DOE-RL, RP (A3-04)
Lisa Treichel	DOE-HQ (EM-442)
John Price.....	WDOE (Kennewick) (B5-18)
Noel Smith-Jackson	WDOE (Kennewick) (B5-18)
Jean Vanni.....	WDOE (Kennewick) (B5-18)
Wayne Soper.....	WDOE (Kennewick) (B5-18)
Dennis Faulk.....	EPA (B5-01)
Randy Acselrod	Washington Dept. of Health
Richard Jaquish.....	Washington Dept. of Health
Debora McBaugh.....	Washington Dept. of Health
Eileen Murphy-Fitch	FD (A1-14)
John April.....	BHI (T8-02)
Jane Borghese.....	FH (E6-35)
Rich Carlson	BHI (H0-17)
Frank Corpuz	BHI (H0-17)
Rick Donahoe	BHI (X5-60)
Jon Fancher.....	CHI (X5-60)
Ella Feist	CHI (H9-01)
Kim Koegler	BHI (H0-23)
Rex Miller.....	BHI (X3-40)
Robert Nielson	BHI (X9-08)
Debbie Roskelley	BHI (X0-17)
Annie Smet	BHI (X0-17)
Dean Strom.....	CHI (X3-40)
Jill Thomson.....	CHI (H9-01)
Joan Woolard.....	BHI (H0-02)
Administrative Record	BHI (H0-09) 2 copies

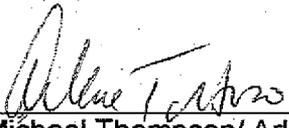
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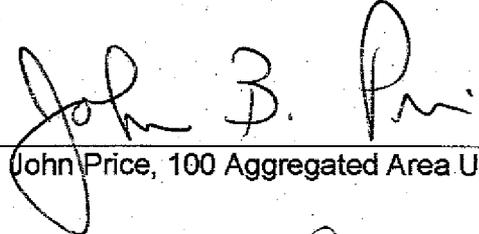
Please inform Debbie Roskelley (376-9850) – BHI (X0-17)
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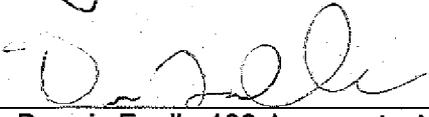
EDMC

Meeting Minutes Transmittal/Approval
Unit Managers' Meeting
100 Area Remedial Action and Waste Disposal Unit/Source Operable Unit
3350 George Washington Way, Richland, Washington
October 23, 2003

APPROVAL:  Date 12/4/03
Chris Smith/Jamie Zeisloft, 100 Area Unit Managers, RL (A3-04)

APPROVAL:  Date 12/4/03
Michael Thompson/ Arlene Tortoso, Waste Management
Division, RL (A6-38)

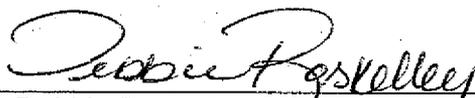
APPROVAL:  Date 12/4/03
John Price, 100 Aggregated Area Unit Manager, Ecology (B5-18)

APPROVAL:  Date 12-4-03
Dennis Faulk, 100 Aggregate Area Unit Manager, EPA (B5-01)

Meeting minutes are attached. Minutes are comprised of the following:

- Attachment 1 -- Attendance Sheet
 - Attachment 2 -- Agenda
 - Attachment 3 -- 100 Area Meeting Minutes
 - Attachment 4 -- WIDS Site CVP Closeout Summary Table
 - Attachment 5 -- 100 Area Groundwater UMM minutes
-

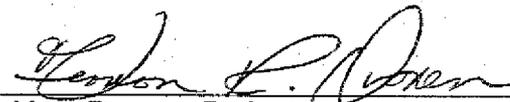
Prepared by:


Debbie Roskelley (X0-17)

Date

12/3/03

Concurrence by:


Vern Dronen, Project Manager
BHI Remedial Action Project (X0-17)

Date

12/3/03

<u>Name</u>	<u>Organization</u>
Kent R. Westover	DOE-RL
Richard Carlson	BHI
Beth Rockett	Ecology
Roger Landon	BHI
Jack Donnelly	BHI
Ella Faust	CHI
M R Schwab	BHI
John Price	Ecology
Alex Nagasab	BHI
Dean Strom	CHI 100-BC
Jill Thomson	CHI
Alex Termonis	DOE/CLD

100 AREA UNIT MANAGERS MEETING AGENDA

3350 George Washington Way
October 23, 2003

1:00 – 4:00 p.m. 3350 GWW (Room 1B45)

Administrative

- Meeting minutes status
- Review and approve last UMM minutes

Remedial Action

100 Area Common

- Remaining Sites ESD Status
- Remaining Sites Sampling Efforts Status
- Burial Ground SAP revision
- 100 Area RDR & SAP comments
- CVP status

100 F, K, and Group 4

- 100 F General Status
- 100 K General Status

100 N

- Project update
- Crib Redesign
- Area of Contamination
- RCRA Permit Modifications

100 B/C

- Backfill concurrence still needs to be signed (north of B Ave.)
- Finished the BC Pipelines and associated plumes
- Finished characterization sampling for the Remaining Sites
- Started sampling campaigns to support the CVP south of B Ave.
- Supporting upcoming Burial Ground work.

D&D

- Project Status

General Crossover Items

-

Review Open Action Items Log

-

Other

Outstanding 100 Area Unit Manager's Meeting Action Items

June 2003 Actions

- **Dennis Faulk (EPA) asked Chris Smith (DOE) to bring revegetation of 100-F backfilled areas above the FY04 funding line in the DWP.**

August 2003 Actions

- **John Price (Ecology) will get back to Rich Carlson (BHI) by Tuesday September 2, 2003 on the status of the MP-14 for 128-D-1 review.**

September 2003 Actions

- **Jack Donnelly (BHI) to send the 100-F Air Monitoring Plan to Randy Acselrod (DOH).**
- **Ella Feist to set up a meeting to resolve comments.**
- **John Price (Ecology) to contact DOE on status of approving the 100-N TSD schedule extension to December 2005 (Class 1 Permit Modification).**

UNIT MANAGERS MEETING MINUTES

3350 George Washington Way, 1B45

October 23, 2003

1:00 – 3:00 p.m.

100 Area

3350 GWW, 1B45

Administrative

- Meeting Minute Status – September meeting minutes were approved and signed by those in attendance with one correction.
- The next 100 Area Unit Managers Meeting will be a combined November and December meeting and will be scheduled for December 4 or 11, 2003, at 3350 GWW room 1B45 beginning at 1:00 p.m.

- Action Item Update:

Jack Donnelly (BHI) to send the 100-F Air Monitoring Plan to Randy Acselrod (DOH). Complete, transmitted to RL on October 22, 2003.

Ella Feist to set up a meeting to resolve comments. Complete, meeting has been scheduled.

John Price (Ecology) to contact DOE on status of approving the 100-N TSD schedule extension to December 2005 (Class 1 Permit Modification). Complete, approved on October 15, 2003.

Remedial Action

100 Area Common

- Remaining Sites ESD – It was clarified that the Remaining Sites ESD is a different ESD than the 100-N Area ESD. The Remaining Sites ESD was sent to the regulators, EPA was to forward it to Region 10 Legal.
- Remaining Sites Sampling Efforts Status – All 100-B/C sampling is complete except for one miscellaneous pipeline sub-unit, which is expected to be sampled within the next two weeks. Remaining Sites miscellaneous pipelines are included in the ESD and are currently being sampled.
- Burial Ground SAP Revisions – Ecology needs to discuss, internally, the proposed language changes and give feedback to Pam Doctor (BHI).
- 100 Area RDR and SAP Comments – John Price (Ecology) stated that they have three major concerns with the 100 Area RDR and SAP. The first concern is review and approval of TPA documents. Ecology stated that the TPA requires projects to

provide the status of tiered documents to them each month. This can be accomplished by providing a list of tiered documents at each Unit Manager's Meeting, which will allow Ecology to determine what documents they want to review and approve. The process will be defined in the RDR.

The second concern is the failure to use the revised August 2001, WAC 173-340, Method B cleanup levels. John restated Ecology's position that the 100 Area RDR should incorporate the August 2001, WAC 173-340 cleanup values. The observation was made that an ESD would be required to change the cleanup levels in the RODs. John requested that the change be added to the 100 Area Remaining Sites ESD that is currently being prepared. It was determined that an offline meeting is required.

Action: Jack Donnelly (BHI) to schedule a meeting to discuss implementation of August 2001, WAC 173-340 Method B cleanup levels.

The third concern was the uranium as a metal cleanup level. Beth Rochette (Ecology) stated the evaluating uranium as a metal results in more restrictive cleanup levels than those obtained from evaluating the radiological risk of uranium, and that the uranium cleanup level in the RDR should be revised. It was determined that further evaluation is required.

- CVP Status – Alex Nazarali (BHI) reported that some CVPs are at EPA awaiting signature. One Backfill Concurrence Form is at EPA. The form needs to be signed so work can continue at 100-B/C. The CVP Summary Table is attached as Attachment 4.

100-F, -K, and Group 4

- There was no status on Group 4 work.

100-N

- Project Update – The RCRA Permit modification was approved.
- Crib Redesign – Jack Donnelly (BHI) will bring a schedule for the crib redesign and air monitoring plan to the next 100 Area UMM.

100-B/C

- Dean Strom (CHI) reported that some work has been delayed until EPA signs the Backfill Concurrence Form for the remediated pipelines north of B Avenue.
- Work is finished on the 100-B/C pipelines scope and associated plumes. Sampling campaigns have been initiated for remediated pipelines south of B Avenue. The plan is to have backfill concurrence by January 2, 2004.

- The project is still waiting for the results of the Cr+6 Leachate Study for pipelines 28/29. The results of the Leachate Study will determine whether additional plumes will need to be pursued within these pipelines.
- The B/C remedial action support for characterization sampling was completed on October 24, 2003.
- The project is currently working on accelerating work scope for four burial grounds (118-B-4, 118-B-5, 118-B-10, 118-C-2). The plan is to start remediation in November.

D&D

- There was no status from D&D.

Groundwater

- Groundwater met separately with the regulators. The meeting minutes are attached (Attachment 5).

Action: Jane Borghese will prepare presentation on actions that are being taken to evaluate possible causes of the breakthrough in a few wells at the ISRM barrier.

Outstanding 100 Area Unit Manager's Meeting Action Items

June 2003 Actions

- Dennis Faulk (EPA) asked Chris Smith (DOE) to bring revegetation of 100-F backfilled areas above the FY04 funding line in the DWP.

August 2003 Actions

- John Price (Ecology) will get back to Rich Carlson (BHI) by Tuesday, September 2, 2003 on the status of the MP-14 for 128-D-1 review.

October 2003 Actions

- Jack Donnelly (BHI) to schedule a meeting to discuss implementation of August 2001, WAC 173-340 Method B cleanup levels into the 100 Area RDR and SAP. **Complete. Meeting held on November 26.**
- Jane Borghese will prepare presentation on actions that are being taken to evaluate possible causes of the breakthrough in a few wells at the ISRM barrier.

WIDS Site CVP Closeout Summary Table

WIDS Site Closeout	CVP Doc. No. documenting WIDS site closeout.	EPA/ Ecology WIDS Signoff	Issue Rev. 0 CVP
100 B/C Area			
116-B-13	CVP-1999-00002	7/22/99	7/1999
116-B-14	CVP-1999-00003	7/22/99	7/1999
116-C-1	CVP-1998-00006	1/21/99	1/1999
116-B-1	CVP-1999-00012	12/8/1999	12/1999
116-B-11	CVP-1999-00001	12/8/1999	12/1999
116-C-5	CVP-1999-00004	12/8/1999	12/1999
116-B-4	CVP-1999-00014	2/24/2000	3/3/2000
116-B-6B	CVP-1999-00017	2/24/2000	3/3/2000
116-B-9	CVP-1999-00009	2/24/2000	3/3/2000
116-B-2	CVP-1999-00015	2/24/2000	3/3/2000
116-B-3	CVP-1999-00013	2/24/2000	3/3/2000
116-B-10	CVP-1999-00010	2/24/2000	3/3/2000
116-B-12	CVP-1999-00008	2/24/2000	3/3/2000
116-C-2A			
116-C-2B	CVP-1999-00019	3/15/2000	3/28/1999
116-C-2C			
116-B-6A	CVP-1999-00011	5/17/2000	5/26/2000
116-B-16			
116-B-7			
132-B-6	CVP-2002-00003	7/25/2002	8/6/2002
132-C-2			
BC Pipeline	CVP-2002-00012	(in progress 9/30/03)	
100-B-5	CVP-2003-00014	6/18/2003	9/11/2003
1607-B7	CVP-2003-00004	5/27/2003	7/29/2003
1607-B8	CVP-2003-00005	5/27/2003	7/29/2003
1607-B9	CVP-2003-00006	6/19/2003	8/28/2003
1607-B10	CVP-2003-00007	5/27/2003	7/29/2003
1607-B11	CVP-2003-00008	5/27/2003	7/29/2003
100-C-3	CVP-2003-00009	5/27/2003	7/28/2003
118-C-4	CVP-2003-00015	6/25/2003	9/11/2003
100 D-Area			
100-D-4 (107D5)	CVP-98-00004	3/25/1999	3/1999
100-D-20 (107D3)	CVP-98-00003	3/25/1999	3/1999
100-D-21(107D2)	CVP-98-00002	3/25/1999	3/1999
100-D-22 (107D1)	CVP-98-00001	3/25/1999	3/1999
1607-D2		closed	
1607-D2:1 Tile Field	CVP-98-00005	3/25/1999	3/1999
Septic Pipelines	CVP-2000-0004	9/26/2000	9/2000
Septic Tank	CVP-99-00005	11/23/1999	12/1999
116-DR-9			
100-D-25	CVP-99-00006	1/6/2000	1/2000
116-D-7	CVP-99-00007	8/15/2000	8/2000
100-D-18 (107D4)	CVP-2000-00001	9/26/2000	10/2/2000
116-DR-1			
116-DR-2	CVP-2000-00002	9/26/2000	9/27/2000
100-D-48		closed	
100-D-48:1 (Grp 2 North Pipelines)	CVP-2000-00003	3/14/2001	3/2001
100-D-48:2 (Grp 2 West Pipelines)	CVP-2000-00005	9/26/2000	10/2/2000
100-D-48:3 (Grp 3 Large Pipelines)	CVP-2000-00034	4/20/2001	4/20/2001
100-D-48:4 (Grp 3 Small Pipelines)	CVP-2000-00033	4/17/2001	4/20/2001
100-D-19			
UPR-100-D-4	CVP-2000-00003	3/14/2001	3/2001
100-D-49		closed	
100-D-49:1 (Grp 2 North Pipelines)	CVP-2000-00003	3/14/2001	3/2001
100-D-49:2 (Grp 2 East Pipelines)	CVP-2000-00005	9/26/2000	10/2/2000
100-D-48:3 (Grp 3 Large Pipelines)	CVP-2000-00034	4/20/2001	4/20/2001

WIDS Site CVP Closeout Summary Table

WIDS Site Closeout	CVP Doc. No. documenting WIDS site closeout	EPA/ Ecology WIDS Signoff	Issue Rev. 0 CVP
100 D Area (cont.)			
UPR-100-D-2	CVP-2000-00005	9/26/2000	10/2/2000
UPR-100-D-3			
100-D-5	CVP-2000-00034	4/20/2001	4/20/2001
100-D-6			
116-D-3	no CVP site rejected	5/17/2000	N/A
116-D-4	CVP-2000-00008	10/23/2000	10/31/2000
116-D-6	CVP-2000-00009	11/7/2000	11/9/2000
116-D-1A	CVP-2000-00010	3/12/2001	3/2001
116-D-1B			
100-D-46			
116-D-2	CVP-2000-00013	10/23/2000	10/25/2000
116-DR-6	CVP-2000-00014	10/23/2000	10/24/2000
116-DR-4	CVP-2000-00015	10/23/2000	10/25/2000
100-D-12	CVP-2000-00016	10/23/2000	10/26/2000
100-D-52	CVP-2000-00018	11/7/2000	11/9/2000
116-DR-7	CVP-2000-00019	9/26/2000	10/2/2000
116-D-9	CVP-2000-00012	3/23/2001	3/23/2001
100 H Area			
1607-H2	CVP-2000-00024	2/5/2001	2/2001
1607-H4	CVP-2000-00025	2/26/2001	2/26/2001
116-H-1	CVP-2000-00026	4/4/2001	4/11/2001
116-H-7	CVP-2000-00027	7/24/2001	8/1/2001
100-H-5	CVP-2000-00028	12/21/2000	12/21/2000
100-H-17	CVP-2000-00031	3/6/2001	3/8/2001
116-H-2			
100-H-2			
100-H-30			
100-H-21	CVP-2000-00029	3/29/2001	3/29/2001
100-H-22			
100-H-1			
100-H-24	CVP-2000-00030	5/9/2001	5/2001
116-H-3	CVP-2000-00032	4/3/2001	4/11/2001
100 N Area			
120-N-1	CVP-2001-00021	3/28/2002	4/18/2002
120-N-2			
100-N-58	CVP-2002-00002	9/26/2002	12/23/2002
116-N-3			
100 Area Misc. & 300 Area			
JA Jones	CVP-2001-00019	11/8/2001	12/10/2001
600-23	CVP-2001-00020	11/30/2001	12/17/2001
300-49 (Landfill 1A)	CVP-2000-00020	1/12/2003	6/9/2003
300-50 (Landfill 1B)	CVP-2000-00021	1/27/2003	6/9/2003
628-4 (Landfill 1D)	CVP-2003-00001	4/10/2003	7/23/2003
316-1(South Process Pond) & 300-262	CVP-2003-00002	4/10/2003	7/23/2003
UPR-300-FF-1			
UPR-300-32, 33, 34, 35, 36, & 37			

WIDS Site CVP Closeout Summary Table

WIDS Site Closeout	CVP Doc. No. documenting WIDS site closeout	EPA/ Ecology WIDS Signoff	Issue Rev. 0 CVP
100 F Area			
116-F-4	CVP-2001-00006	11/8/2001	11/15/2001
116-F-5	CVP-2001-00007	8/16/2001	8/23/2001
1607-F6	CVP-2001-00010	11/8/2001	11/15/2001
UPR-100-F2	CVP-2001-00011	4/22/2002	5/7/2002
100-F-19:1	CVP-2001-00002	5/21/2002	6/10/2002
100-F-19:3			
100-F-34			
116-F-12			
100-F-40	site closed (No CVP)	2/15/2002	2/15/2002
116-F-14	CVP-2001-00009	7/11/2002	7/18/2002
100-F-2	CVP-2001-00001	7/25/2002	8/5/2002
100-F-15	CVP-2002-00001	7/25/2002	8/6/2002
100-F-4			
100-F-11			
100-F-16			
116-F-9	CVP- 2001-00008	10/16/2002	10/22/2002
116-F-2	CVP- 2001-00005	1/13/2003	3/11/2003
126-F-1	CVP- 2002-00002	1/13/2003	TBD
100-F-35	CVP-2002-00007	4/15/2003	6/16/2003
116-F-1	CVP-2002-00009	5/22/2003	Pending
116-F-3	CVP-2002-00008	4/15/2003	6/16/2003
116-F-6	CVP-2002-00010	5/19/2003	Pending
116-F-10	CVP-2002-00006	4/15/2003	6/16/2003
1607-F2	CVP-2002-00005	1/13/2003	3/11/2003
100-F-19:2	CVP-2001-00003	5/27/2003	9/15/2003
116-F-11			
UPR-100-F-1			
100-F-29			
UPR-100-F-3	CVP-2003-10	6/9/2003	8/14/2003
100-F-25	CVP-2003-11	6/9/2003	8/14/2003
100-F-23	CVP-2003-12	6/9/2003	8/14/2003
100-F-24			

WIDS Site CVP Closeout Summary Table

WIDS Site Closeout	MP-14 Doc. No. documenting WIDS site closeout	EPA/ Ecology WIDS Signoff	Issue Rev. 0 MP-14
100-B-3	CCN 1066327	6/12/2003	
116-B-15	CCN 1066327	6/12/2003	
132-B-1	CCN 1066327	6/12/2003	
132-B-3	CCN 1066327	6/12/2003	
132-B-4	CCN 1066327	6/12/2003	
132-B-5	CCN 1066327	6/12/2003	
116-C-6	CCN 108263	6/24/2003	
132-C-1	CCN 1066327	6/12/2003	
132-C-3	CCN 1066327	6/12/2003	
128-D-1	CCN 1066327	6/12/2003	
128-F-1	CCN 108263	6/24/2003	
100-F-28	CCN 1066327	6/12/2003	
132-F-3	CCN 1066327	6/12/2003	
132-F-4	CCN 1066327	6/12/2003	
132-F-5	CCN 1066327	6/12/2003	
132-F-6	CCN 1066327	6/12/2003	
100-K-30	CCN 108263	6/24/2003	
600-52	CCN 108263	6/24/2003	
600-99	CCN 108263	6/24/2003	
600-107	CCN 108263	6/24/2003	
600-128	CCN 108263	6/24/2003	
600-131	CCN 108263	6/24/2003	
600-132	CCN 108263	6/24/2003	
600-139	CCN 108263	6/24/2003	
600-181	CCN 108263	6/24/2003	
600-190	CCN 108263	6/24/2003	
600-201	CCN 108263	6/24/2003	
600-204	CCN 108263	6/24/2003	
628-1	CCN 108263	6/24/2003	

100 Area GW UMM

October 22, 2003

Attendees: Mike Thompson (DOE/RL), Dib Goswami (Ecology), John Price (Ecology), John Winterhalder (FH), Vern Johnson (FH), Jane Borghese (FH)

Status of the pump and treat systems at 100-HR-3, 100-KR-4 and 100-NR-2, are attached. Highlights discussed during the meeting are as follows.

Five wells within the ISRM barrier showed hexavalent chromium in groundwater samples. Discussion centered on different barrier types, failure rates and possible corrective actions.

Action: Jane Borghese will prepare presentation on actions that are being taken to evaluate possible causes of the breakthrough in a few wells at the ISRM barrier.

Preliminary screening results of 100-D shoreline sampling were discussed. The initial samples suggest elevated hexavalent chromium (maximum of 275 ppb) has reached the stretch of shoreline between the ISRM and the extraction well capture zone. Previous porewater surveys and aquifer tube sampling in this stretch have indicated hexavalent chromium concentrations of < 10 ppb. Follow up sampling of aquifer tubes will occur within the next few months.

Sampling Analysis Instructions for Aquifer Sampling Tubes Sampling and Installation was discussed. EPA (via e-mail) requested additional analytes for the 100 K tubes. This change will be incorporated into the final version for approval by Ecology and EPA.

100 Area UMM – October 2003

Groundwater operations from October 1 through October 19 are summarized as follows:

100-HR-3

The pump and treat system operated normally for the report period. The average flow rate was 183 gpm and run times were 100% for the report period, 100 % for FY2004 and 92 % since inception. Some extraction wells were shutdown periodically due to low water level.

ISRM: Chromium breakthrough is occurring in five of the 66 injection wells (199-D4-25, 199-D4-26, 199-D4-31, 199-D4-37 and 199-D4-41). For example, hexavalent chromium concentrations in the monthly samples from these five wells ranged from 80 ug/L to 360 ug/L for samples collected on September 25, 2003. Concentrations in well 199-D4-26 are decreasing while concentrations in the other four wells are increasing.

100-D Area: Hexavalent chromium concentrations in the corridor between the northeast end of the ISRM and the extraction well network capture zone are either remaining elevated or are continuing to increase (e.g. 199-D5-20 recently exceeded 1000 ug/L). The three new wells to be drilled in October and November of this year are located in the "corridor" of increasing chromium concentrations. Attempts to locate driving forces and source areas continued. Preliminary modeling to evaluate the potential use of injected water (from a small scale pump and treat operation) to divert the zone with the highest chromium concentrations back toward the ISRM barrier was conducted. Results suggest injection of ~ 50 gpm of treated water could redirect most of the high concentration portion of the plume back toward the ISRM. Pros and cons of this and other options are being evaluated.

100-KR-4

The pump and treat system operated normally during the report period (The average flow rate was 271 gpm and run times were: 100% for the report period, 100% for FY2004 and 94.7% since inception.

Planning for characterization of the northeastern extent of the KR-4 plume continued. One concern is the large number of boulders that may complicate drilling for defining the northeastern extent of the plume. Cultural resource issues also may limit the area that can be investigated. Results of the fall aquifer tube sampling will be used to help define the extent of the downstream plume boundary.

A sampling and analysis instruction (SAI) for the FY 04 aquifer tube sampling was prepared and circulated for review. Preparations continued for installation of the new aquifer tubes at KR-4 and HR-3.

100-NR-2

The pump and treat system operated normally during the report period. The average flow rate was 63 gpm and run times were: 100% for the report period, 100% for FY2004 and 93.1% since inception.

A statement of work to PNNL to evaluate phytoremediation and apatite treatment options for the strontium-90 plume was issued to PNNL to begin the greenhouse and laboratory evaluation phase for these alternative treatment options.

The initial phase of the DQO to determine additional data needs for determining aquatic and riparian impacts was begun. Ecology is summarizing stakeholder and tribal input on assessment endpoints which are part of the initial phase of the DQO process.