WASHINGTON STATE

ENERGY FACILITY SITE EVALUATION COUNCIL

Richard Hemstad Building

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Conference Room 206

Olympia, Washington

November 24, 2015

1:32 p.m.

MONTHLY COUNCIL MEETING

Verbatim Transcript of Proceeding

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A P P E A R A N C E S

Councilmembers Present:

Bill Lynch, Chair
Liz Green-Taylor, Department of Commerce
Cullen Stephenson, Department of Ecology
Joe Stohr, Department of Fish and Wildlife
Dennis Moss, Utilities and Transportation Commission
Dan Siemann, Department of Natural Resources

Local Government and Optional State Agency:

Ken Stone, Department of Transportation
Bryan Snodgrass, City of Vancouver
Greg Shafer, Clark County
Larry Paulson, Port of Vancouver

Assistant Attorney General:

Ann Essko, Senior Counsel

Staff in Attendance:

Stephen Posner
Jim LaSpina
Tammy Mastro
Sonia Bumpus
Cassandra Noble
Kali Wraspir
Joan Aitken
Patty Betts

Guests in Attendance:

Rich Downen, Grays Harbor Energy
Jan Aarts, Cardno
Kevin Freeman, Cardno

Continued...

APPEARANCES CONTINUED:

Guests in Attendance Via Phone:

Mark A. Miller, PacifiCorp Chehalis Generation Facility
Shannon Khounnala, Columbia Generating & WNP 1/4
Kristen Boyles, Earthjustice
Karen McGaffey, Perkins Coie
Jennifer Diaz, Puget Sound Energy
Haley Edwards, Puget Sound Energy
Eric Melbardis, EDP Renewables

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OLYMPIA, WASHINGTON, NOVEMBER 24, 2015

1:32 P.M.

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P R O C E E D I N G S

CHAIR LYNCH: Good afternoon. Today is November 24th, it's 1:30 p.m., and this is the regular meeting of the Energy Facility Site Evaluation Council.

Could we please have the clerk call the roll?

THE CLERK: Department of Commerce?

MS. GREEN-TAYLOR: Liz Green-Taylor, here.

THE CLERK: Department of Ecology?

MR. STEPHENSON: Cullen Stephenson, here.

THE CLERK: Fish and Wildlife?

MR. STOHR: Joe Stohr is here.

THE CLERK: Natural Resources?

MR. SIEMANN: Dan Siemann, here.

THE CLERK: Utilities and Transportation Commission?

MR. MOSS: Dennis Moss is here.

THE CLERK: Local governments and optional State agencies.

For the Tesoro Project, or Department of

Transportation?

MR. STONE: Ken Stone is here.

THE CLERK: City of Vancouver?

MR. SNODGRASS: Bryan Snodgrass, here.

THE CLERK: Clark County?

MR. SHAFER: Greg Shafer, present.

THE CLERK: Port of Vancouver?

MR. PAULSON: Larry Paulson, here.

THE CLERK: Chair, there is a quorum for the regular council as well as the Tesoro Project council.

CHAIR LYNCH: Thank you.

And if I could please have the councilmembers review the proposed agenda for today and see if they have any additions that they'd like to make.

I would note two things for the agenda today. First of all, there will be an action item by the Council. That would be the issuance of a minor radiological emissions license for the Columbia Generating Station; and then we'll be taking up the publication of the Draft EIS toward the end of the meeting.

So any suggested changes to today's agenda? Seeing none, we'll move forward.

If I could have those people who are on the phone who wish to identify themselves, please do so now,

though you're not required to.

MR. MILLER: This is Mark Miller from the Chehalis Generating Facility.

MS. DIAZ: Jennifer Diaz from --

CHAIR LYNCH: Ms. Diaz, if you could move a little closer to your phone, it will be easier to hear you, but --

MS. DIAZ: How's that?

CHAIR LYNCH: That's still pretty faint. That's a little iffy.

MS. DIAZ: Okay. I might need to dial in on a different phone, then.

CHAIR LYNCH: Okay. Thank you.

MS. DIAZ: I'll try that.

MS. EDWARDS: This is Haley Edwards of Puget Sound Energy.

MS. KHOUNNALA: Shannon Khounnala with --

UNKNOWN CALLER: (Inaudible), State Department of Health.

MS. KHOUNNALA: Shannon Khounnala, Energy Northwest.

MS. MCGAFFEY: Karen McGaffey, Perkins Coie.

MS. BOYLES: Kristen Boyles, Earthjustice.

MR. MELBARDIS: Eric Melbardis, Kittitas Valley.

CHAIR LYNCH: I'm sorry. If we could have the woman who was starting to state her name go and then the gentleman follow her who just last spoke.

MS. BOYLES: Apologies, Chair Lynch. Kristen Boyles, Earthjustice.

MR. MELBARDIS: Eric Melbardis, EDP Renewables, Kittitas Valley.

CHAIR LYNCH: Anybody else?

MS. DIAZ: Chair Lynch, this is Jennifer Diaz again. Can you hear me now?

CHAIR LYNCH: We can. That's perfect. Thank you, Ms. Diaz.

MS. DIAZ: All right. Thank you.

CHAIR LYNCH: If I could have the Council take a look at the meeting minutes from the October 20, 2015, meeting. And when you're ready, I will entertain a motion for their adoption.

MR. MOSS: Chair Lynch, I would move the adoption of the October 20th, 2015, meeting minutes as transcribed.

CHAIR LYNCH: Do I have a second?

MR. STEPHENSON: I'll second.

CHAIR LYNCH: It's been moved and seconded that the Council adopt the meeting minutes from the October 20th, 2015, council meeting.

All those in favor, say "aye."

MULTIPLE SPEAKERS: Aye.

CHAIR LYNCH: Opposed? Motion carries.

At this point in time, we'll go ahead and move to updates from our various projects. We'll start with the Kittitas Valley Wind Project.

Mr. Melbardis?

MR. MELBARDIS: Good afternoon, Chair Lynch, EFSEC Council.

The only nonroutine item to report to the Council today is that we had a failure of our automatic curtailment mechanism. It's used to curtail turbines A1 and A2 during times of shadow flicker. The issue occurred during a firmware upgrade to our controller.

We were notified by an affected landowner and took steps to correct the issue, and we are monitoring it now. It seems to be working as it should.

CHAIR LYNCH: And Mr. Melbardis, the -- has the -- since those corrections were made, is the -- that neighbor, are they satisfied?

MR. MELBARDIS: We -- we have not heard from them since -- since that, so I'm assuming yes.

CHAIR LYNCH: So we're hoping no news is good news is what you're saying?

MR. MELBARDIS: Yes.

CHAIR LYNCH: Yeah. I'd be -- I guess in my own mind, I would appreciate it, if you wouldn't mind, giving them a call to double-check that.

MR. MELBARDIS: Okay. Will do.

CHAIR LYNCH: Okay. Thank you.

Anything else, Mr. Melbardis?

MR. MELBARDIS: That's all we have here.

CHAIR LYNCH: Are there any questions for Mr. Melbardis?

Very good. Thank you very much.

And Ms. Diaz, Wild Horse Wind Power Project.

MS. DIAZ: Yes. Thank you, Chair Lynch and councilmembers.

For the operational update, I have nothing nonroutine to report.

However, Chair Lynch did request an update on the Eagle Conservation Plan and the eagle take permit. And Haley Edwards, PSE's resource scientist, is on the phone to provide that update.

Are you there, Haley?

MS. EDWARDS: Yes, I'm here. Good afternoon, Chair Lynch and councilmembers.

For the record, this is Haley Edwards with Puget Sound Energy's Avian Protection Program. And I wanted to provide you with an update about the eagle

mortalities at Wild Horse.

So in response to the eagle take incidents that occurred at Wild Horse, PSE provided funding to two different entities that provide benefit to golden eagles.

One was the Blue Mountain Wildlife Rehab facility, and we provided funding for eagles and other raptor rehabilitation, education and outreach programs, and their lead abatement program.

And the second entity is HawkWatch International, and we provided funding for an eagle and vehicle road-strike study that's looking at eagle behavior and risk of collisions with vehicles while eagles are scavenging on roadsides and the effectiveness of carcass-removal programs to reduce this risk.

PSE has submitted a letter to the Fish and Wildlife Service, Office of Law Enforcement, to document this response, and also to provide some information about the value of these programs for golden eagles. And we are currently waiting to hear back from the service about whether these cases will be resolved.

In addition, just as a reminder, PSE is conducting one year of formal eagle fatality monitoring at Wild Horse at all turbines, and that study is going on from March of this year through March of next year.

The protocol was reviewed and discussed by the TAC in February of 2015. And once these surveys are complete, the results will be provided to the TAC. No additional eagles have been identified since April of 2015.

For the Eagle Conservation Plan update, PSE has filed a preliminary draft Eagle Conservation Plan with the Service for consideration of an eagle take permit back in December of 2014. PSE received comments from the Service in March of 2015, and has made revisions in response to those comments.

PSE is preparing to submit a revised draft ECP with the Service within the next several months, next month or two probably, and to continue the consultation process. The draft ECP is considered pre-decisional by the Service, and is not publicly available at this time.

The possible issuance of an eagle take permit is subject to the National Environmental Policy Act, and during the NEPA process, the Service will provide an official notice in the Federal Register seeking public comment. And the Service will release a draft Environmental Assessment for Wild Horse at that time.

Once the final ECP is complete and publicly

available, PSE will provide the ECP to the EFSEC council and to the TAC.

CHAIR LYNCH: And do you have anything else, Ms. Edwards?

MS. EDWARDS: That's all I have, council -- Chairman Lynch.

CHAIR LYNCH: Thank you. We appreciate the update.

Regarding the eagle incident, are there any questions by councilmembers for either Ms. Edwards or Ms. Diaz? No. Thank you, both of you.

MS. DIAZ: Yes, thank you.

CHAIR LYNCH: Thank you.

And now Grays Harbor Energy Center, Mr. Downen. Welcome.

MR. DOWNEN: Good afternoon, Chair Lynch, Council. My name's Rich Downen. I'm the plant manager at Grays Harbor Energy.

The monthly report for the month of October, the only things off-normal would be item 1.4. This is normal, but not very routine. It's the annual inspection by the State Fire Marshal was performed during the month. Mr. LaSpina came out and was on site for that, and we received a clean -- clean report. No discrepancies noted. It was a positive report.

CHAIR LYNCH: I think that's pretty good from the State Fire Marshal. I was recollecting, they usually can find something, so that's good that there's no discrepancies.

MR. DOWNEN: Yeah. We were pleased that they couldn't find anything, so -- because there was nothing to find.

And let's see. And the only other off-normal thing would be item 2.5. I mentioned this at the last meeting, that we reperformed a couple of tests from our RATA tests, the annual stack emissions testing, due to a vendor, they missed a couple of data points when they had done it in August, so that was done. And the report should be out this month; if not, in December. And that is all that I have that's not just a normal report.

CHAIR LYNCH: Any questions for Mr. Downen?

Very good. Thank you.

Let's turn now to the Chehalis Generation Facility. Mr. Miller?

MR. MILLER: Good afternoon, Chair Lynch, councilmembers and Staff. This is Mark Miller, the plant manager at the PacifiCorp Chehalis Generating Facility. I have two nonroutine comments to add.

I want to clarify that the report I

submitted on the -- was for the November wastewater results and not October. The October results were within the measuring limits where the level of zinc is 0.11 milligrams per liter.

The results from our resample taken for the month of November, which we indicate in the environmental section there, the second result came back at 0.15 milligrams per liter, for an average of 0.875 milligrams for the month of November. I would have reported on that next month, but I put it in this report.

As required, we did notify the City of Chehalis Wastewater Treatment Facility as well as US EPA, Michael Lee, and copied Mr. LaSpina.

Also, last Wednesday the plant experienced a catastrophic failure of the compressor on our unit two combustion turbine. The manufacturer, General Electric, has a root-cause analysis team here on site beginning the investigation. I will share more information in next month's report as we have it available.

One thing to add to that as well is, we did also have an inspection from the Washington State Deputy Fire Marshal, and they scheduled a reinspection for mid-November. And there's still a couple items that he will be reinspecting next month again. So we weren't

quite as successful as Mr. Downen there.

CHAIR LYNCH: And Mr. LaSpina, do you have anything to add to the report?

MR. LASPINA: No, Chair Lynch.

CHAIR LYNCH: So we'll be hearing more about those particular items later, then.

Any questions for Mr. Miller?

Thank you, Mr. Miller.

MR. MILLER: Thank you.

CHAIR LYNCH: Let's go ahead and turn to the Columbia Generation Station. Ms. Khounnala?

MS. KHOUNNALA: Yes. Good afternoon, Chair Lynch and Council.

For the update for Columbia Generating Station, we have just one nonroutine item to report.

You may have seen in the newspaper -- in a newspaper report last week, on the fuel defect that was reported at Columbia. I know an article ran locally in the Tri-Cities newspaper, and I believe it ran in Oregon as well. So I wanted to mention this today in the event there were any questions, and just provide a brief high-level summary of that issue.

So as you can see in your Council report, Columbia is operating at 100 percent power. However, this past week and the weekend, based on some ongoing

monitoring programs that we have, we also performed some inspections and operational maneuvers, which identified two incidents of minor fuel defects within our reactor.

So fuel defects can result either from manufacturing defects of the fuel, or abrasions from foreign materials through the cladding of the fuel pellets. With the identification of these two fuel defects, we have suppressed the associated fuel assemblies. And from that, Columbia continues to operate safely at 100 percent power.

With the fuel assembly suppressed, it does not present a risk to plant safety, and it really does not affect our operational output at this time. However, what will happen is, we expect it to lead to slightly reduced power -- reactor power approximately two weeks earlier than scheduled as the plant approaches the May 2017 refueling outage. We call this a coastdown of power output, and that coastdown will take a couple of weeks as we approach that maintenance outage.

I think it's important to note that, while Columbia has not had a fuel defect for 13 years, it does occur occasionally within the industry. To put the fuel defects in perspective, the levels we detected in our monitoring program would have to have been a thousand times higher to be of a safety concern to the Nuclear

Regulatory Commission.

So we caught -- we identified these two defects very quickly, and suppressed them very quickly, which is really the action that we want under these circumstances. So there are no EFSEC or NRC-related permit or operational violations or anything, and we're -- we're disappointed to have these fuel defects; however, we identified them quickly, and their location, and we continue operations as planned going forward.

So with regards to Columbia, I don't have any other events to report.

Are there any questions?

CHAIR LYNCH: Just one, Ms. Khounnala.

My understanding is, is that the incident you just were speaking about is considered so minor by the NRC they don't even require a report; is that correct?

MS. KHOUNNALA: That's correct. We -- we make a minor kind of, like -- I guess a heads-up notification to them. However, there's no formal reporting or incidences or any actions that we take with them as a result of this.

CHAIR LYNCH: Okay. Thank you. Any questions for Ms. Khounnala regarding the Columbia Generating Station?

And why don't we -- before we move on WNP 1/4, let's go ahead and take up the draft order 875.

Mr. LaSpina?

MR. LASPINA: Chair Lynch, I would like to provide an update of the NPDES permit appeal before we move on, if that's all right.

CHAIR LYNCH: Yes. Please do that.

MR. LASPINA: Good afternoon, Chair Lynch, councilmembers.

On September 30th, 2014, the Council reissued the NPDES permit to Energy Northwest for wastewater discharges from the Columbia Generating Station.

The permit was subsequently appealed to the Thurston County Superior Court by three environmental organizations. The Court did not stay the permit, so the permit has been and remains in effect.

On September 18th, 2015, the Court decided in favor of EFSEC and affirmed the permit. The Court decision was not appealed. However, on July 28, 2015, in a separate decision for an Ecology-issued permit, the State Appellate Court struck down a provision of all State-issued NPDES permits involving failure of a whole effluent toxicity test.

The final order of the Thurston County

Superior Court on the -- on our permit appeal directed EFSEC to modify the Columbia Generating Station permit condition to incorporate the Appellate Court's decision. And this is because the environmental organizations that appealed our permit included that Appellate Court decision in their appeal, so we got kind of up into it.

At next month's council meeting, EFSEC Staff expects to present the proposed permit modification to the Council, and notify the Council that Staff intends to proceed -- to begin a 30-day public notice process. This is a public notice process required for nearly all permit modifications.

Assuming no substantive comments are received, Staff plans to seek Council approval for issuance of a modified permit at its January 2016 meeting.

I'm prepared to answer any questions or concerns you may have at this time.

CHAIR LYNCH: So basically, just to recap what Mr. LaSpina said there, our -- our permit for the Columbia Generating Station for the NPDES permit had some boilerplate language in it, or "whole effluent toxicity testing," and it's that boilerplate language that's in all -- that was in all Ecology NPDES permits that got thrown out by a Court decision subsequent to us

issuing the NPDES permit.

So what we would be doing is getting new boilerplate language to insert in our permits, so we would be going to -- out for public comment on that particular permit modification.

Any questions for Mr. LaSpina?

Thank you.

And do you want to continue on with the -- with the license that we're going to be adopting today, or Council Order No. 875?

MR. LASPINA: Thank you, Chair Lynch.

At today's meeting, EFSEC Staff requires the Council approval to issue Order 875 to address closure of an unused stormwater infiltration system. Order 875 is actually a license to regulate potential emissions of fugitive radionuclides that may occur during the closure process.

Energy Northwest has discontinued the use of the infiltration system and proposes to decommission the system. The infiltration system will be filled to grade above -- filled to grade or above with clean fill and the site covered with gravel.

I don't think I have it here. The infiltration system consists basically of an unlined ditch, and then a widening of the ditch into sort of an

informal pond where the water infiltrates to the ground water.

The SEPA checklist for this action identified the need for an emissions license to address the possible emission of radionuclides that may occur during decommissioning.

EFSEC's contractor for radionuclide issues, the State Department of Health, typically issues these licenses for facilities not regulated by EFSEC.

RCW 70.94.422, subpart (2), addresses EFSEC to regulate activities such as those described in the order.

The language in the draft order was provided by Health and is consistent with all applicable regulatory requirements.

Monitoring required by Order 875 will cease at the completion of construction activity, but will be picked up by the existing radiological environmental monitoring program that has been in place at the facility for quite some years.

Issuance of Order 875 will fulfill the requirements of Chapter 246-247, Washington Administrative Code, and WAC 463-78-070.

SEPA requirements for the filling and grading of the channel and pond and issuance of Order

875 have been met with the submittal and review of a SEPA checklist and issuance of a determination of nonsignificance by the EFSEC manager.

EFSEC Staff recommends that Council approve issuance of the license in the form of EFSEC Order 875.

And I'm happy to answer any questions or concerns that you may have.

CHAIR LYNCH: Any questions for Mr. LaSpina?

You may remember, just a few months ago we issued a similar license for this facility having to do with the evaporation ponds, and this is the next step within that process.

If there's no questions, I entertain a motion for adoption of Order 875.

MR. MOSS: Chair Lynch, I would move that the Council approve and direct Staff to issue Order 875 to address my licensure of the closure of an unused stormwater infiltration system at the Columbia Generating Station as described by Mr. LaSpina.

CHAIR LYNCH: Do we have a second?

MS. GREEN-TAYLOR: Chair, I'll second that.

CHAIR LYNCH: It's been moved and seconded that the Council issue Order No. 875 as presented by the Staff.

All those in favor, say "aye."

MULTIPLE SPEAKERS: Aye.

CHAIR LYNCH: Opposed? Motion carries.

Now we'll turn back -- thank you. Now we'll turn back to Ms. Khounnala to hear about WNP 1/4.

MS. KHOUNNALA: Yes. Thank you.

So in regard to WNP 1/4, we have had some development on the progress of our NEPA. We've had a meeting -- a team meeting with DOE and their selected contractor this past November, and we have another team meeting planned for December.

The goal of that meeting is to finalize the scope of the NEPA evaluation and other permitting considerations that will be required before we can put the water system to use.

So we have forward progress, but of course we need -- as a reminder, we need to complete all the NEPA permit efforts for the water systems for 1 and 4 before that goes into operation. So we still have a bit of work ahead of us, but we have made some progress.

Any questions?

CHAIR LYNCH: Very good.

Any questions for Ms. Khounnala on WNP 1/4?

Thank you, Ms. Khounnala.

MS. KHOUNNALA: Thank you.

CHAIR LYNCH: Let's go ahead and turn to the

Tesoro Savage Vancouver Energy Distribution Terminal, and we'll have a project update by Ms. Bumpus. And I would note that we've got Jan Aarts and Kevin Freeman here from Cardno here to answer any questions that the councilmembers might have.

But I would just -- before Ms. Bumpus starts giving her update, I would just note that the Council is extending the comment period to an additional 15 days, and I believe it's -- I'm sorry. Is it January 22nd -- is that correct, to January 22nd?

MS. BUMPUS: Correct.

CHAIR LYNCH: And Staff will be talking more about the public hearings associated with those -- with that comment period.

But please go ahead, Ms. Bumpus.

MS. BUMPUS: Thank you.

Good afternoon, Chair Lynch and councilmembers.

We do have updates for you on the project. EFSEC Staff would like to inform councilmembers that the Draft Environmental Impact Statement has been completed and is scheduled to be released today after the council meeting.

EFSEC's Draft EIS comment period also begins today with the additional 15 days agreed to by the

applicant. The comment period end date is extended from January 8th to January 22nd, 2016, for a total of 60 days for public comments.

EFSEC is scheduled to hold two public DEIS meetings during the comment period. One will be held in Vancouver, Washington, on January 5, 2016, at the Clark County Event Center at the fairgrounds. And on January 7th, EFSEC will hold its second public meeting in Spokane Valley, Washington, at the CenterPlace Regional Event Center.

The public will be able to access the complete DEIS document online at EFSEC's website after the meeting. EFSEC's web address is www.efsec.wa.gov. A hard copy of the document is also available to the public here at EFSEC's office. Other hard copies will also be available at several local libraries. The physical addresses are provided in the Draft EIS fact sheet for those libraries' locations.

Public comments on the DEIS can be submitted by mail and electronically using EFSEC's web-based comment system. Public comments will also be accepted at the public meetings I just mentioned.

On a special note, I did want to add, this will be the first time EFSEC has utilized a web-based comment system. This differs from how EFSEC has handled

comments in the past. This was considered after EFSEC received over 31,000 SEPA scoping comments for this proposal, which was a volume that greatly exceeds past projects that EFSEC has reviewed.

The address for the website for submitting comments online is ts.efsec.wa.gov, but again, all of this information is in the DEIS public notice, the DEIS fact sheet, and on EFSEC's website.

A link to the DEIS comment submittal page is also on EFSEC's website, so if you go to the EFSEC homepage, you'll be able to get the link to submit a DEIS comment.

So are there any questions before I move forward into other updates? I have more on the DEIS, but any questions about those particular items?

CHAIR LYNCH: Any questions for Ms. Bumpus so far?

Please continue.

MS. BUMPUS: Okay.

For DEIS milestones, I just wanted to note, or highlight some of the key milestones that we've accomplished to get to the completion of the DEIS.

From October to December of 2013, EFSEC councilmembers will recall, we completed a 60-day SEPA scoping comment period. As I mentioned, we received

over 31,000 public comments during that time.

In February 2014, EFSEC prepared the SEPA scoping report and presented that report to EFSEC councilmembers in April of 2014 in Vancouver, Washington.

Over the next several months following the April meeting, EFSEC received several submittals, portions of the applicant's preliminary Draft EIS. EFSEC and its independent consultant, Cardno, reviewed those materials as they were submitted. And in December 2014, the gap analysis was completed on the PDEIS prepared by the applicant, and EFSEC staff and Cardno presented an overview of the gap analysis findings to councilmembers.

The goals and objectives to prepare EFSEC's DEIS being issued today were discussed with councilmembers at that December meeting. We listed corrective actions to address deficiencies that were identified in the PDEIS.

These included building on work completed by the applicant, which were looking at geotechnical studies, seismic hazard analysis, and facility design plans to look at seismic concerns. These included and are discussed in the DEIS, ground motion, soil liquefaction, liquefaction-induced permanent ground

deformation, landslides, surface fault rupture, potential and tsunami potential.

We also developed a separate section in the DEIS, Chapter 4, meant to analyze potential impacts from accidental releases of crude oil. These -- Chapter 4 looked at potential impacts from a proposed project on the Vancouver Fire Department's operational response capabilities, and an independent assessment of rail and vessel spill risk analysis.

There was also other areas that we just supplemented with additional information or some additional analysis, such as expanding on the air-quality analysis to include construction activities and mobile sources and the impacts associated with those.

Then there were several others that were more general in scale that were really reorganizing the document, improving clarity and project understanding, revising the text for a more balanced and objective tone, describing the analytical methods very clearly so it's clear to the reader what we were -- what our methodology was, and differentiating between on- and off-site impacts.

So those are my remarks on kind of revisiting what we shared in December 2014 and what

we've been working on in preparing this Draft EIS. And EFSEC staff's overall DEIS goals were and continue to be ensuring compliance with SEPA, analyzing the proposal and identifying potential environmental impacts, capturing EFSEC's initial SEPA scope, informed by public comments, including comments from agencies' affected tribes, and creating a well-organized, understandable and informed EIS.

CHAIR LYNCH: Any questions for Ms. Bumpus so far?

MS. BUMPUS: So we are looking forward to public input on the DEIS. And we'll continue to provide updates to councilmembers as we move forward into the 60-day public comment period and prepare for the public meetings.

CHAIR LYNCH: And does that conclude your --

MS. BUMPUS: Yeah, that's everything.

CHAIR LYNCH: I would like to at this point in time invite councilmembers to comment on the Draft EIS or to ask Staff questions that they might have.

And I would just note that I appreciate the extra analysis that has been done on the Draft EIS, but recognizing that a lot of work has been done, I would just -- I just wanted to flag a couple things in my mind where I think some extra analysis would assist the

Council in helping -- determining the potential impacts from the project and how those impacts might be mitigated.

Well, one that pops into my head having to do with the spill analysis, there was a distinction made between the Canadian tar sand oil and the Bakken oil, and I think the Draft EIS does a very good job of going through the various properties of the two different types of oil.

And it notes that the -- the Canadian oil, the tar sand oil, won't sink immediately, but some factors that will lend it to sinking are: One, is it fresh water; two, is it in water that's somewhat turbulent; and the third is, is there some sediment in the water column.

And so I read that, and I was thinking, well, what's the Columbia River? What's the -- so they took us so far, but then what is the risk here for the Columbia River?

So what I would like to see is that some sort of modeling be done where a WRIA is selected -- where it's been flagged as a WRIA where if a spill did occur, it would be particularly problematic because of the environmental values of that WRIA, whether it's sole-source aquifer or whether it's salmon spawning or

what have you.

But I would like to see some modeling done where a spill -- my understanding from reading the Draft EIS and the appendices, a typical spill, if there's a derailment -- well, a derailment would be most likely four to five cars, and then it goes on and the -- a certain amount of contents of those cars would be spilled.

So I would like to see that scenario be modeled, and then also a situation in the same WRIA where a number of other cars -- and I'm sorry, I don't have a number to tell you. You can work that out with the people who know more than me, which is just about anybody, I guess. So you can work out a scenario where there's a greater derailment and a greater spillage.

But what I'm interested in is the fact that a particular response vessel to spills was called out in the Draft EIS, and if there was in fact a spill in this particular WRIA, how long would this vessel take to deploy, get out there, set the booms up and start recovering the oil that was spilled.

And what I don't know is, are they likely to recover 10 percent of the oil, 90 percent of the oil, something in between? So what I would like to know -- and recognizing that a number of assumptions need to be

made when you put a model together like this, and that reality could be something different.

But I think it would be helpful to me and other councilmembers to get a sense of what would happen if there is a spill of this dilbit in the Columbia in an area where it's particularly sensitive; and for that oil that is not recovered, what is the impact to the environment in that particular area?

So that's one thing I would think would be of value to the Council in determining the proposed impacts from this project.

And the second one I would like to see is the issue regarding seismic safety for the site itself. The -- it talks about the berm -- that analysis was done of the berm, and it appears to be, from what I remember reading, that the berm itself will withstand the back-and-forth shaking during an earthquake, but there's the land beneath the berm, which would be prone to collapsing.

And there are some -- this has been identified as a potential problem, but there's a number of different ways that the applicant and the applicant's consultant and our consultant and Staff can work out which option makes the most sense to -- for the applicant to pursue to make sure that this doesn't

happen. So that is one area where I would also like to see some more work done before we get to the final EIS.

And there's -- I'm sure there's other little things, but those were two things which I wanted to flag in particular. And I'll just throw it open to other councilmembers to see if they have any comments that they'd like to share. And don't feel like you have to.

Yes, Mr. Stohr.

MR. STOHR: Thank you, Mr. Chair.

Ms. Bumpus, maybe -- one thing I noticed when I looked through an earlier draft, and I think others did, too, was the alternatives analysis.

And I know we talked earlier that there's been some work done to improve the alternatives analysis, but I'd be curious as to the thinking that's gone into the evolution of that and what we would see in the -- in the Draft EIS along those lines.

MS. BUMPUS: In terms of what has changed?

MR. STOHR: What's changed, what alternatives are there and why, and, you know, just a little bit of understanding about how those were selected.

MS. BUMPUS: Well, I can tell you that in the DEIS that we are issuing today, we -- we carry through the no-action alternative and the proposed

action. We do not carry through any other alternatives that we looked at.

We did revise the alternatives analysis. As you noted, there were some reviews, earlier reviews of previous iterations of the document and there were several internal discussions between EFSEC staff and Cardno about how best to fit that -- that section together. And what was -- what were appropriate alternatives that we wanted to discuss.

Stephen, do you have anything you might want to add about --

MR. POSNER: I would just --

MS. BUMPUS: -- the changes to the alternatives analysis?

MR. POSNER: I would just add that, you know, originally when we first started doing this analysis and looking at this project in terms of what type of alternatives analysis was required, there was questions about whether or not this was a public project or a private project. And we took sort of the middle ground in terms of how we would do an alternatives analysis.

And since that time, which has been well over a year, I would say, I'm not sure exactly how long, but several months, the information that we've been

reviewing, and sort of the back and forth that we've had with our consultant and others is we're moving more towards this project looking like a private project, based on a number of factors in terms of, you know, who the applicant actually is, the role of the port.

And so with that, you've seen, I would say, from initial -- from, you know, first drafts, or earlier versions, a less robust -- or the analysis does not include as many options or the detail that you would see in a public project.

But there is more analysis, and there are -- there are off-site or alternatives sites that were analyzed to a certain degree in the draft that we have at this point.

MS. BUMPUS: Yes. We did retain -- although we changed the -- or shifted the approach somewhat in light of the public versus private sort of decision that we were trying to make in formulating the analysis, we retained information about off-site locations and the evaluations that we had in the earlier iterations you saw.

MR. STOHR: Okay. Thank you. That helps.

CHAIR LYNCH: And I think there's more specificity, too, in some of the alternatives discussion. If I remember correctly, the Port of

Longview and the Port of Kalama were discussed at some point as potential sites, and then there was -- in this version, there's more discussion as to hurdles that both of those particular sites would have to overcome in order for the proposal to work. So I remember there being a lot more specificity in this version than there were in previous versions.

Any other Council comments or questions?

Dan -- excuse me, Mr. Siemann.

MR. SIEMANN: Thank you, Chair Lynch.

My question revolves around the maximum daily intake of crude oil. In earlier -- in some of the earlier documents and some of the early drafts, there were -- it was described in two different ways. Sometimes it said "up to" 360,000 barrels, and sometimes it said "an average of."

And I think that that's all been shifted now to "an average of," but I think that "an average of" is still somewhat vague, and, in my mind somewhat -- that question becomes somewhat fundamental in terms of how much oil can be shipped, and how many trains per day can be accommodated, and what that means for safety, for traffic and for other aspects of the project, and for the environmental analysis in general.

So I was wondering if you could speak to

that.

MS. BUMPUS: Right. So there were several discussions about this particular topic. There were -- there was correspondence with the applicant about what the limitations were for offloading crude oil.

One of the big factors that we learned in talking with the applicant were the constraints of the size of the -- of the -- around the unloading area, not being able to stack unit trains one behind the other. They would not be able to do that.

So we also talked to them about the amount of time it takes to offload a single unit train, and they shared with us the amount of time that -- that they -- sort of a range, actually, that they provided to us. And it was based on -- really based on those constraints that we were coming up with what we think is the average amount that would be offloaded at this facility.

So we are assuming a set number of -- assuming a volume for each tank car, and then looking at how long it would take to offload the trains, the fact that trains cannot be stacked one behind the other and brought in immediately after one train leaves. That's how we came to the -- to the four -- an average of four per day, and then the volume of 360,000 barrels per day.

And Cardno is here, too. They can answer some of the other questions about some of the assumptions that were made in those calculations.

But I also wanted to note, I recall that, over the course of preparing the DEIS, we've added more information about the capacity, the offloading question. We've continued to add details about what our assumptions are, about the number of trains, the number of cars within a unit train, and the factor of time and constraints at the site.

MR. SIEMANN: Thank you for that.

What I did notice is that in the -- in the draft that I read, it did note that on this some days, more than the standard number of trains could come. And so what I'm wondering about is, how often could that actually occur?

And a corollary question to that is, is the -- is the offloading of the oil the constraint, or is there also a constraint with regard to storage and loading onto the barges or ships?

MS. BUMPUS: I'm going to direct that question to Cardno. I think we do have some discussion now. Over the course of iterations, I think we've added some detail about the possibility of a fifth, and -- but I am unsure about whether or not we talked about how

frequent that could occur. That was definitely something that was continuing to be supplemented and rewritten over the course of preparing the document.

CHAIR LYNCH: Mr. Aarts or Mr. Freeman?

MR. AARTS: Sure.

CHAIR LYNCH: Please approach the microphone.

MR. AARTS: Okay.

CHAIR LYNCH: And while you're there, I guess a follow-up to Mr. Siemann's question is, I notice that it said that, on average, you have four trains a day, but occasionally there would be a fifth that might come in.

But is there a situation where you can have, like, a full week of five trains coming in a day?

MR. AARTS: The way I understand it, and the information is based on what the applicant's provided, is that's going to be an infrequent occurrence. It's primarily an average of four trains per day. On occasion, a fifth train may arrive in a 24-hour period, but it wouldn't complete its offloading until partially into the next 24-hour period. So we've continuously used and consistently used the four trains per day.

One of the things that we have done in terms of trying to visualize a max would be a maximum

throughput on an annual basis. So using just the regular math of a 120-car unit train, approximately 750 barrels per car, four trains a day, multiply by 365, I don't have the number off the top of my head, but that's basically the maximum throughput that we've been using throughout the document and the analysis.

MR. SIEMANN: Thank you.

CHAIR LYNCH: I want you to stay there, Mr. Aarts, for the -- in case there's some additional questions.

Mr. Snodgrass, you had a question?

MR. SNODGRASS: Thank you, Chair.

I have -- I guess I would echo the Chair's praise for the work done, but also some suggestions or requests on perhaps some additional work, and feel free to comment.

One is in the area of risk of explosion. The document goes into some detail on the risk of derailment, I believe it's a two-year return. Or a spill, a 27-year return. But then stops short of risk of explosion, which is obviously critical from a number of factors.

And the concern there is that the document -- or the consultant had discussed that in terms of the additional data, it couldn't -- meaningful

conclusions, I believe, couldn't be drawn. And I'm concerned, because elsewhere in the document it lists and summarizes the -- I think there was 220 CBR accidents involving derailments, of which there were 12 fires, 3 explosions.

And so I don't know what the number should be, and I think, though -- I'm not sure we have the luxury of not drawing some conclusions from the historical record we have, even if it isn't statistically significant.

So I hope there's some opportunity as we go forward to either have Dagmar Etkin or someone else analyze the historic -- recent historical record, at least if it's CBR specific, and provide some conclusions. And if they need to be tenuous, that's -- so be it, going forward.

In terms of another impact that I don't think the document identifies or identifies fully is the economic impact from a threat of a fire or explosion. And one of the source documents listed here in the -- for this EIS is the 2014 Department of Ecology study of marine and rail transportation study.

PHONE PARTICIPANT: We're having a hard time hearing you.

CHAIR LYNCH: If you can pull the mic a

little bit closer.

MR. SNODGRASS: One of the source documents to this study is the 2014 DOE transportation study, and it noted that -- perceived concerns about risks of fire, explosion, may result in impacts to property values, and so I think that's -- that's something I think should be explored further.

And I do note that this document does have some information on property value impacts, but it's based all on pre-CBR data. So I would question the full relevance of that, and would ask that -- if there's a way to look further into that as we go forward, that's critical, beginning with simply identifying that this is a potential impact.

I think it's also a potential impact not just to residential properties along the rail corridor, but also potential commercial activities along the corridor. Certainly we heard that in scoping. I don't -- have no idea on the magnitude, but I do believe that's an important question going forward.

A concern just about the level of information provided in the seismic section. The document --

PHONE PARTICIPANT: I'm sorry to interrupt, but we can't hear you at all, for those of us on the

phone.

MR. SNODGRASS: A potential concern in terms of the level of information in the seismic and, I believe, the earth chapter, that the document, at least the last version available for Council viewing from October, did note that seismic disruptions -- or particularly high potential that disruptions of rail traffic is particularly high in Washington, but information on some of the probabilities, not just of a larger earthquake, but a smaller one as well. I did not see there, it wasn't clear. And also some of the impacts from that, what levels of earthquake would lead to minor impacts to rail infrastructure, what levels of earthquake would lead to potentially derailment of a moving train. I think that's important information moving forward.

I think also in terms of cumulative impacts, that was well documented in the cumulative impacts chapter. I think it's -- it was unclear to the extent to which the -- that information was carried forward in the other analyses, and certainly one of the things the cumulative impacts chapter noted was capacity -- level of busyness, if you will, of the -- both the rail and vessel corridor will be substantially higher during the planning period. How that plays out, I think, is

something that would be worth further analysis.

Lastly, I think that just in terms of the summary of it, one of the SEPA requirements is identifying areas of uncertainty in a project, and I think what needs to be clearly stated up front is apparent, I think, just from reading the document, or reading from these comments here, is the degree to which crude by rail is a relatively new activity in the about last five years, and also the various potential mitigation measures identified are also new, and that adding quite a bit of uncertainty as we go forward.

So those would be my comments.

CHAIR LYNCH: Any further comments or questions by councilmembers?

Yes, Mr. Shafer.

MR. SHAFER: Thank you, Mr. Chair.

Mine is in the area of emergency response. I think the document shows very good and proactive work was done to send out surveys to the fire departments along the rail line and also within the site and the city of Vancouver itself.

My concern is, I can't recall that any of the departments or other emergency response agencies, I don't think there was one that came forward and said, yes, we are ready in the event of a derailment or an

accident, we're good, we're trained, we're good to go. In fact, I think all of them sided on the other side of that: We're not prepared, we're not trained up, it would be a concern.

And so I would like to see, if possible, the document go further in addressing that. What might the various fire departments or other response agencies, what are their needs, how do we address those needs, is it training, is it added staff, is it equipment, is it supplies, all of the above, do they need to be better coordinated and such.

CHAIR LYNCH: Thank you.

Now, Mr. Aarts or Ms. Bumpus, do you have a response to that?

MS. BUMPUS: I'm just going to note that it's correct that for those that -- that did respond, the feedback that we did get from those that responded was that there's concerns about lack of preparedness in terms of equipment, training, personnel and other resources, so --

MR. AARTS: I was going to say, and the mitigation measures in chapter four are very specific and address some of the concerns you've just raised.

CHAIR LYNCH: Right. And some of the concerns were, even if there were the resources to train

all those people, you still need people to respond to fires and other emergencies, so it was just that -- to maintain a level of staffing, and then to get the people trained up was an issue.

Mr. Moss, did you have --

MR. MOSS: Chair Lynch, if I could just follow up on that.

One of the things that struck me about this particular section of the draft was the low response rate relative to the number of agencies that are out there as first responders.

Now, I know from experience that when you send out surveys, you often get a response rate of this level, but it seems to me that perhaps some consideration should be given to being more proactive in seeking out -- affirmatively seeking out response from the more than 50 percent of those first responders identified who did not give us any information at all. It leaves a pretty big gap in my mind about how prepared the responders are in terms of the entire project.

CHAIR LYNCH: Any other questions or comments by councilmembers? Very good.

And then, Mr. Posner, I believe you are going to say something about tribal consultation.

MR. POSNER: Right. As part of the

centennial court, agencies are required to reach out to tribes whenever they're doing any kind of analysis such as this. And we've been doing this all along throughout scoping, and I've had personal contact with various tribes and there have been a number of tribes that have provided comments, scoping comments.

And we will be sending out a letter today to all of the tribes offering up or giving them an opportunity to engage in government-to-government consultation.

CHAIR LYNCH: Okay. Very good.

And before we leave the Vancouver Energy Distribution Terminal issue, I just wanted to thank councilmembers for their diligence in reading this information and responding to Staff, and Staff's hard work and patience in dealing with all of us.

And this is the first time, to my knowledge, that Council has weighed in on a Draft EIS. In the past, the Council has just been told that a Draft EIS has been published. But I think this was well worth the time that you-all put into this because we got a lot of good questions, a lot of good comments, which make this a stronger draft, and which will make it a stronger final EIS.

So I appreciate all your hard work on that,

and especially the Staff, because when -- I tend to work late, and whenever I go home, they're still here. So I appreciate the long hours that you-all put in on making this happen. So thank you.

So let's go ahead and turn to other issues.

Mr. LaSpina, do you want to give us a rules update?

MR. LASPINA: Thank you, Chair Lynch.

This update concerns minor revisions of EFSEC's NPDES rules contained in two WAC chapters that has been reported to the Council for the last several months.

The purpose of the rulemaking was to clarify the process for EFSEC's issuance of coverage under Ecology-issued general permits. State statutes clearly authorize EFSEC to issue such coverages, but the current language in the rules are ambiguous.

The rule revision utilized the State's expedited rulemaking process. The public comment period began on September 2nd, 2015, and ended October 19th, 2015. EFSEC did not receive any public comments on the proposed rule adoption.

The rule adoption order, or the CR-103, has been filed with the code reviser's office. The rule revisions will become effective on December 24th, 2015.

If you have any questions, I'm happy to answer.

CHAIR LYNCH: And these are the rules that we adopted at our last council meeting, but we're just basically -- everything's been sent in to the code reviser, and it will be published in the register and then be taking effect a little bit later in the year.

Thank you, Mr. LaSpina.

And a couple items of note. One is, I did have a stakeholder meeting on the number of different people who's interested in our process. I had the hearing on -- a meeting on November 12th here in our offices for the purpose of putting together potential legislation for the 2017 session on how to streamline our EFSEC siting process. It was well attended. People had some good ideas. And when session ends in 2016, we're going to reconvene the group and see where we go from there.

I also wanted to flag for the councilmembers, if you didn't open your e-mail, the memo that we put together talking about recent accomplishments and initiatives at EFSEC, and this group started really getting going in November of last year, and it's interesting to see how much we've accomplished in that time. I've got 23 things listed on this piece

of paper. So sometimes people ask us, well, geez, you only have one application in the door, what are you guys doing? Well, this, I think, answers that question.

And is there anything else further before the Council?

Hearing none, we're adjourned. Thank you.

(Hearing concluded at 2:36 p.m.)

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C E R T I F I C A T E

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

I, ANITA W. SELF, a Certified Shorthand Reporter in and for the State of Washington, do hereby certify that the foregoing transcript is true and accurate to the best of my knowledge, skill and ability.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 9th day of December, 2015.

_____

ANITA W. SELF, RPR, CCR #3032

Kittitas Valley Wind Power Project
Monthly Project Update

November 24, 2015

Project Status Update

September Production Summary:

Power generated:	14,923 MWh
Wind speed:	5.5 m/s or 12.3 mph
Capacity Factor:	19.9%

Safety:
No incidents

Compliance:
Project is in compliance as of November 16, 2015.

Sound:
No complaints

Shadow Flicker:
The equipment that automatically controls shadow flicker curtailment of turbines A1 and A2 lost some configuration settings during a firmware upgrade. We were notified of the failure by an affected landowner and have made corrections to the settings. We may still need to tune our start and stop times throughout the year and are closely monitoring the situation.

Environmental:
No incidents

Wild Horse

Below is the monthly operational/compliance update for Wild Horse. Haley Edwards will be participating on the call this month to provide an update on the Eagle Conservation Plan and Eagle Take Permit. Please let me know if you have any questions.

Wind Production: October generation totaled 50,710 MWh for an average capacity factor of 25%.

Safety: No lost-time accidents or safety incidents to report in October.

Compliance/Environmental: Nothing to report.

EFSEC Monthly Operational Report

October, 2015

1. Safety and Training
   - 1.1. There were no accidents or injuries during the month of October.
   - 1.2. Conducted scheduled and required monthly training.
   - 1.3. Conducted the scheduled safety committee meeting.
   - 1.4. The State Fire Marshal conducted his annual site inspection, also attended by EFSEC (LaSpina). No discrepancies were identified.
2. Environmental
   - 2.1. Submitted the September Discharge Monitor Report (DMR) for Outfall 001 and Outfall 002B to EFSEC.
   - 2.2. Established WebDMR access for future DMR reporting.
   - 2.3. Submitted the 2015 Priority Pollutant sample results to EFSEC.
   - 2.4. Submitted the 2015 Q3 Emissions Data Report (EDR) to EFSEC and ORCAA.
   - 2.5. Re-performed a portion of the annual stack testing due to vendor omissions.
3. Operations & Maintenance
   - 3.1. Grays Harbor Energy (GHE) operated 31 days and generated 405,732 MWh during the month of October.
   - 3.2. The capacity factor (CF) was 88.0% in October, and 50.3% YTD.
   - 3.3. The availability factor (AF) was 100% in October, and 94.7% YTD.
4. Noise and/or Odor
   - 4.1. There were no complaints made to the site during the month of October.
5. Site Visits
   - 5.1. Jim LaSpina was onsite for a visit during the State Fire Marshall's annual inspection.
6. Other
   - 6.1. Grays Harbor is fully staffed with 22 personnel.
   - 6.2. Noise monitoring equipment is installed and is functional, and will be added into the Distributed Control System (DCS) as a Main Control Room indication the next time the plant is off line.
   - 6.3. Distributed Control System (DCS) logic for automatic isolation of the Outfall stream (Outfall 01) is modified to include the Cooling Tower Basin pH signal as an isolation parameter. This logic will be uploaded into the Distributed Control System (DCS) the next time the plant is off line.

PACIFICORP
A BERKSHIRE HATHAWAY ENERGY COMPANY

Chehalis Generation Facility
1813 Bishop Road
Chehalis, Washington 98532
Phone: 360-748-1300

Chehalis Generation Facility----Monthly Plant Report - October 2015
Washington Energy Facility Site Evaluation Council

24 October 2015

Safety:

- There were no recordable incidents this reporting period and the plant staff has achieved 4731 days without a Lost Time Accident.

Environment:

- There were no air emissions deviations or stormwater deviations or spills during the month of October 2015.
- Waste water monitoring results identified that levels of zinc measured in the sample was above the threshold effluent limitation of 1.4 mg/L. The actual measurement was 1.6 mg/L. The City of Chehalis and US Environmental Protection Agency were notified as required per section II (Reporting Requirements), subsection D (Non-Compliance Reporting) of the Wastewater Discharge Requirements. The Chehalis Generating Facility submitted this notification of the non-compliance of the applicable discharge limit for zinc, within 24 hours of becoming aware of the value above the threshold limitation.
    - The plants environmental analyst initiated resampling and retesting of the waste water discharge. The follow up results were 0.15 mg/L. We are continuing to investigate the anomaly and address any potential sources of zinc in the system
    - There have been no operational or process changes at the Facility.

Personnel:

- Authorized plant staffing level is currently 19 with 19 positions filled.

Operations and Maintenance Activities:

- The Plant generated 201,892 MW-hrs in September and a capacity factor YTD of 26.1%.

Regulatory/Compliance:

- The Washington State Deputy Fire Marshal conducted an inspection of the Facility on October 13, 2015. The inspection identified 6 items with Code References that require action. A follow up inspection was scheduled for mid-November.

Sound monitoring: There were no noise complaints to report.

PACIFICORP
A BERKSHIRE HATHAWAY ENERGY COMPANY

Carbon Offset Mitigation

- Work began on the high efficiency lighting project with completion planned for mid-December.
- Contract discussions continue on the variable frequency drives (VFD's) for the water treatment reverse osmosis pumps are nearing completion
- Vendors are being researched for the VFD's for the closed cooling water system.

Respectfully,

Mark A. Miller
Manager, Gas Plant

Energy Northwest
EFSEC Council Meeting
November 24, 2015
(Shannon Khounnala)

I. Columbia Generating Station Operational Status

Columbia is online at 100% power and producing 1148 MWs. The plant has been online for 148 days.

There are no other events, safety incidents, or regulatory issues to report.

II. WNP 1/4 Water Rights

The Department of Energy continues to work on the NEPA Environmental Assessment (EA) for WNP 1/4. ***Energy Northwest, the Department of Energy and their contractor meet in November to finalize the NEPA scope. A follow-up meeting is being planned for early December to review the final scope.*** The NEPA Environmental Assessment will allow a new lease to be signed between EN and the Department of Energy, and thereby allow for use of the water rights obtained in January of this year. The preparation of the NEPA Environmental Assessment is expected to last through winter and spring 2016 with formal reviews to follow.

STATE OF WASHINGTON

ENERGY FACILITY SITE EVALUATION COUNCIL

PO Box 43172 • Olympia, Washington 98504-3172

MEMO

TO: EFSEC Council

FROM: EFSEC Staff

DATE: November 24, 2015

SUBJECT: Proposed Issuance of EFSEC Order 875: Fugitive Radionuclides Emissions License for Closure of the Columbia Generating Station Stormwater Channel and Pond

Introduction

At today's meeting, EFSEC staff requests Council approval to issue Order 875 to address closure of an unused stormwater infiltration system. Order 875 is a license to regulate potential emissions of fugitive radionuclides that may occur during the closure process.

Background

Prior to 2014, Energy Northwest, through its National Pollutant Discharge Elimination System (NPDES) Permit, was authorized to discharge certain wastewater streams to an infiltration system consisting of an unlined channel and pond. This stormwater infiltration system is similar to the stormwater percolation ponds common throughout western Washington. This type of system operates by filtering out contaminants in the stormwater through the soil column. Water remaining eventually recharges the aquifer.

During development of the NPDES Permit issued in September 2014, Energy Northwest proposed construction of an evaporative wastewater treatment system to eliminate the discharge to the infiltration system. The SEPA Checklist for construction and operation of the evaporative treatment system identified the need for an emissions license to address the possible emission of radionuclides that may occur during the construction and operation of the new treatment system. The radionuclides emissions license for the new treatment system, in the form of Order 874, was approved by the Council at its January 20, 2015 meeting.

Today's Proposed Action

Energy Northwest has discontinued the use of the infiltration system and proposes to decommission the system. The infiltration system will be filled to grade or above with clean fill and the site covered with gravel. The SEPA Checklist for this action identified the need for an emissions license to address the possible emission of radionuclides that may occur during

decommissioning. EFSEC's contractor for radionuclide issues, the state Department of Health (Health) typically issues these licenses for facilities not regulated by EFSEC. RCW 79.94.422(2) authorizes EFSEC to regulate activities such as those described in Order 875. The language in the draft order was provided by Health and is consistent with applicable regulatory requirements. Monitoring required by Order 875 will cease at the completion of construction activity, but will be picked up by the existing sitewide Radiological Environmental Monitoring Program. Issuance of Order 875 will fulfill the requirements of Chapter 246-247 Washington Administrative Code (WAC) and WAC 463-78-070.

SEPA requirements for the filling and grading of the channel and pond and issuance of Order 875 have been met with the submittal and review of a SEPA checklist and issuance of a determination of nonsignificance (DNS) by the EFSEC Manager.

EFSEC Staff recommends the Council approve issuance of the fugitive radionuclides emissions license in the form of EFSEC Order 875.

STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL
P. O. BOX 43172
OLYMPIA, WASHINGTON 98504-3172

In the Matter of:	**COUNCIL ORDER No. 875**
COLUMBIA GENERATING STATION	**Order to Manage and Regulate Fugitive Radionuclide Emissions from the Decommissioning of the Outfall 002 Stormwater Channel and Pond.**

Regulatory Authority:

Pursuant to the Revised Code of Washington (RCW) 70.94.331, 70.94.422, Chapter 80.50 RCW, Washington Administrative Code (WAC) 463-78-070, and Chapter 246-247 WAC, the Energy Facility Site Evaluation Council (EFSEC) now finds the following:

Findings:

1. Energy Northwest (EN) is the operator of the Columbia Generating Station (CGS), an electric generating plant located on the Hanford Site in Benton County, Washington.

2. CGS has historically discharged onsite stormwater into an unlined channel and pond, but this discharge is now conveyed to a recently constructed evaporative pond treatment system. As part of the decommissioning process for the channel and pond, the requirement for this license was identified in the SEPA checklist.

3. Construction activity to decommission the channel and pond has the potential to emit fugitive radionuclide emissions, and therefore, is required to obtain a Radioactive Air Emissions License in accordance with Chapter 246-247 WAC Radiation Protection-Air Emissions Regulation.

4. Construction activity to decommission the channel and pond has the potential to emit fugitive radionuclides at levels agreed to by EN and EFSEC.

Order:

THEREFORE, IT IS ORDERED by EFSEC in relation to the above that EN's former Outfall 002 stormwater channel and pond decommissioning be implemented subject to the conditions described below.

1.0 GENERAL APPROVAL CONDITIONS

1.1 Effective date

The effective date of this authorization shall be that as signed in Section 3.0. All references to procedures or test methods shall be those in effect as of the effective date of this ORDER.

2.0 OPERATIONAL LIMITATIONS AND ADDITIONAL REQUIREMENTS

2.1 Department of Health Emission Unit Description

Project Title: CGS Stormwater Channel and Pond Decommissioning.

Emission Unit ID: 1424

Notice of Construction (NOC) ID: 980

This emission unit consists of construction activity to decommission an unused stormwater channel and infiltration pond.

This Emission Unit has 1 active NOC.

This is a MINOR, FUGITIVE, non-point source emission unit.

2.2 Abatement Technology

Best available radionuclide control technology (BARCT)
WAC 246-247-040(3), -040(4)

State-only Enforceable: WAC 246-247-010(4), -040(5), -060(5)

Abatement Technology: None

2.3 Monitoring Requirements

2.3.1 State Enforceable: WAC 246-247-040(5), -060(5)

Federal and State Regulatory	Monitoring and Testing Requirements	Radionuclides Requiring Measurement	Sampling Frequency
WAC 246-247-075(5)	WAC 246-247-075(5)	Co-60, Cs-137	Weekly gross beta and quarterly composites for gamma emitting radionuclides.

2.3.2 Sampling Requirements: Air samples are collected and analyzed in accordance with the Radiological Environmental Monitoring Program.

2.3.4 Additional Requirements: Additional monitoring or sampling requirements established by this Order will be listed in the Conditions and Limitations section, if applicable.

2.4 Conditions (state only enforceable): WAC 246-247-040(5), 060(5) if not specified

2.4.1 The total abated emission limit for this Notice of Construction is limited to 1.90E-05 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)). The total limit on the Potential-To-Emit for this Notice of Construction is limited to 1.90E-05 mrem/year to the Maximally Exposed Individual (WAC 246-247-030(21)).

2.4.2 This emission unit is for the decommissioning of the unused storm drain channel and pond (SDP). Use of the SDP was discontinued in 2014. The decommissioning will include the filling of the channel and pond of the SDP to grade using clean soil. The channel and pond will then be covered with rock. The SDP discharge pipe has been permanently sealed and discharges starting in November 2014 have been diverted to the evaporative ponds.

2.4.4 The Annual Possession Quantity is limited to the following radionuclides (Curies/year):

Parameter	Limit (Curies/year)
Co-60	3.91E-05
Cs-137	3.98E-06

2.4.5 ABATEMENT CONTROLS: Water will be used as dust control during decommissioning of the SDP. WAC 246-247-040(5).

2.4.6 ABATEMENT CONTROLS: Clean soil will be used to fill the channel and pond to grade. Rock will be applied to the clean soil after the SDP is to grade. WAC 246-247-040(5).

2.4.7 ANNUAL REPORTING: Radionuclide emissions will be determined in accordance with the Offsite Dose Calculation Manual and reported in the annual radioactive air emissions report due June 30th for the previous year. WAC 246-247-075 (5)(a).

2.4.8 MONITORING: Air monitoring for the SDP decommissioning will use air monitors ST-1, 21, 23, and 57. Air samples will be collected and analyzed in accordance with the Radiological Environmental Monitoring Program for CGS. WAC 246-247-075(5), (7), (8). Monitoring required by Order 875 will cease at the completion of construction activity.

3.0 APPROVAL ORDER AND RESTRICTIONS

Any application form, report, or compliance certification submitted pursuant to this Order shall contain certification by a responsible official of truth, accuracy, and completeness.

Nothing in this Order alters the facility's obligation to comply with other laws, including air laws and regulations. Any violation of such rules and regulations or of the terms of this approval, including but not limited to exceedances of emissions limits demonstrated by source testing or emissions calculations, shall be subject to the sanctions provided in Chapter 80.50 RCW.

The provisions of this authorization are severable and, if any provision of this authorization, or application of any provisions of this authorization to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this authorization, shall not be affected thereby.

This Order is subject to judicial review pursuant to the Administrative Procedure Act, Chapter 34.05 RCW, EFSEC rules, EFSEC policies, or as otherwise provided by law. The Administrative Procedure Act can be found on-line at: http://apps.leg.wa.gov/rcw/default.aspx?cite=34.05.

DATED at Olympia, Washington this _____ day of _____, ____.

FOR THE WASHINGTON STATE ENERGY FACILITY SITE EVALUATION COUNCIL.

_____
William Lynch
EFSEC Chairman

ATTEST:

_____
Stephen Posner
EFSEC Manager

_____
John Martell
WDOH

WAC 197-11-970 Determination of Nonsignificance (DNS)

DETERMINATION OF NONSIGNIFICANCE

Description of proposal: Energy Northwest has discontinued the use of the previously permitted National Pollutant Discharge Elimination System (NPDES) unlined stormwater channel and infiltration pond and proposes to decommission the system in late 2015. The channel and pond will be filled to grade or above with clean fill. The site will be covered with 3 inches of 1 ¼ inch minus crushed rock. SEPA is triggered by the volume of fill (2,222 cubic yards) and the issuance of a fugitive radionuclide emissions license, as required by Chapter 246-247 WAC.

Proponent: Energy Northwest

Location of proposal, including street address, if any: 76 North Power Plant Loop, Richland, WA 99354, approximately 10 miles north of Richland, within the federal Hanford Reservation.

Lead agency: EFSEC

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030 (2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

X There is no comment period for this DNS.

Responsible official: Stephen Posner

Position/title: EFSEC Manager

Phone. 360-664-1903

Address: PO Box 43172, Olympia, WA 98504-3172

Date. 11/19/15 Signature

SEPA ENVIRONMENTAL CHECKLIST
UPDATED 2014

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background

1. Name of proposed project, if applicable:

   Decommission of Columbia Generating Station (CGS) Storm Drain Pond.

2. Name of applicant:

Energy Northwest

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

Contact: Shannon Khounnala, Phone: 509-377-8639
Mail Address: P.O. Box 968, PE-03, Richland, WA 99352-0968
Physical Address: 76 North Power Plant Loop, Richland, WA 99354

4. Date checklist prepared: *1/29/2015*

Amended to address agency comments: 9/23/2015

5. Agency requesting checklist: *Energy Facilities Site Evaluation Council (EFSEC)*

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

Decommissioning of Outfall 002 is scheduled to begin in late 2015. Construction will not be phased.

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

There are no plans for future additions or expansions related to this proposal.

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

Ikenberry T.A., and S.L. Bump, "Evaluation of Decommissioning Options for the Storm Drain Pond, Columbia Generation Station" Dade Moeller, Richland, WA, March 2014.

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.

There are no pending applications for other proposals that will affect this project.

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

Radiological Air Emission License

11. Give 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.)

Energy Northwest has discontinued the use of the previously permitted National Pollutant Discharge Elimination System (NPDES) Outfall 002 and proposes to decommission the storm drain pond (SDP) and the associated channel in late 2015. Stormwater and wastewater discharge have been diverted to the newly constructed, lined evaporation ponds in November 2014 and the existing SDP and channel will be decommissioned. Emergent vegetation located in the SDP and channel will be compressed by heavy machinery and left in place. The SDP and channel will be filled to grade or above with clean fill located onsite. ~~The newly placed fill will be re-vegetated with grass or native vegetation to prevent erosion.~~

Amended: Approximately 3 feet of fill will be placed within the channel to bring it up to grade.

The project site is located northeast of CGS next to the newly constructed evaporation ponds. The project site is enclosed by a chain link fence and the overall project area is estimated at 0.56 acres. The length of the channel is approximately 320 feet long and the SDP extends approximately 80 feet beyond the end of the channel. The channel at its widest point is 45 feet and the SDP at its widest point is 110 feet which includes the riparian zones. The overall length of the channel and SDP is approximately 400 feet.

Amended: The site will be covered with 3 inches of 1 1/4" minus crushed rock.

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.

CGS is located in Benton County, Washington, 12 miles northwest of Richland, Washington. The CGS site is located in Section 5 of Township 11 north, Range 28 east, Willamette Meridian, on land leased from the DOE within the Hanford Site. See Figure 1- Site Vicinity, Figure 2- Project Area Map, Figure 3- Site Area, and Figure 4-Aerial Photograph of Project Site.

B. ENVIRONMENTAL ELEMENTS

1. Earth

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

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

The steepest slope on the site is approximently 4%.

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.

In a comprehensive soil survey of the entire Hanford Site, completed in 1966, Rupert sand (also known as Quincy sand) was identified throughout most of the Energy Northwest leased area.

Rupert sand represents one of the most extensive soils on the Hanford site. The surface is a brown to grayish brown coarse sand, which grades to a dark grayish brown sand at about 36 in. Rupert soils developed under grass, sagebrush, and hop sage in coarse sandy alluvial deposits that were mantled by wind-blown sand and formed hummocky terraces and dune-like ridges.

Much of the selected project site location also contains a mix of non-native fill material, including sand, gravel, rock that was disturbed or placed on the selected project area during original CGS construction or during operation of the plant since start-up occurred. The project site is located inside an industrial zoned area and hasn't been used for agriculture. No soil will be removed from project site.

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

No indication of unstable soil in the immediate vicinity of CGS.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Approximately 2,222 yards of fill soil will be used to decommission the STP and bring the project site up to grade with existing elevation. Fill will be supplied from onsite existing stock piles that remained following construction of the adjacent evaporation ponds.
Amended: Approximately 3 feet of fill will be placed within the channel to bring it up to grade.

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

Incidental erosion may occur from removing of vegetation and grading by exposing soils during construction. However, the short duration of the construction activities and the limited rainfall in the region will minimize potential erosion. Following project completion, the site will be covered with ~~native grasses~~ that will minimize any long term potential erosion.

Amended: The site will be covered with 3 inches of 1 1/4" minus crushed rock.

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

The site will have no impervious surface once project is complete.

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

Temporary erosion control measures, such as ground watering, will be used during construction but minor erosion is possible. Following project completion, exposed soils will be ~~planted with native grass to reduce erosion~~. Staging and refueling of machines will be conducted out of the work area to minimize the potential of a fuel spill .
Amended: The site will be covered with 3 inches of 1 1/4" minus crushed rock.

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.

Vehicle exhaust and dust from construction is expected. No long-term change in emissions is expected from the completed project.

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

None.

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

Dust suppression and emission control converters on vehicles are used to help reduce the impacts to air quality.

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 nearest water body, the Columbia River, is more than three miles from the project site. There are no other natural water bodies or wetlands within the vicinity of the project.

2) Will the project require any work over, in, or adjacent to (within 200 feet) 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.

Approximately 2,222 yards of fill soil will be used to decommission Outfall 002 and bring the channel and SDP up to grade. No soil will be removed from site. Fill will be supplied from onsite stock piles remaining from the construction of the evaporation ponds.

Amended: Approximately 3 feet of fill will be placed within the channel to bring it up to grade.

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. Ground Water:

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. the cessation of wastewater discharges to Outfall 002 and decommissioning of the SDP and channel will provide for the protection of ground waters and comply with Chapter 173-200-WAC, Washington's Ground Water Quality Standards.

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.

No waste material will be discharged to the ground on completion of project. Some water will be sprayed on the ground during construction for dust control and to facilitate compaction. Water for dust control will be supplied from the evaporation ponds that have been approved for this use.

c. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) 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.

On completion of the project the site will be completely pervious and covered with ~~grass~~ to prevent runoff and erosion. No method to collect and dispose of runoff will be implemented during construction due to the size of the project and local climate. Large amounts of runoff is not anticipated. Any incidental runoff will not flow into other waters, storm drains, or UIC wells.
Amended:The site will be covered with 3 inches of 1 1/4" minus crushed rock.

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

No. Project site is away from parking lots and other potential pollution sources. However, during construction it is possible for equipment to leak or spill fluids. Refilling of equipment will take place on impervious surfaces and any spills will be immediately cleaned up. A spill kit will be located on site to help clean up any spills.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

No.

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

None.

4. **Plants**

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

_X__deciduous tree: alder, maple, aspen, other
____evergreen tree: fir, cedar, pine, other
_X__shrubs
_X__grass
____pasture
____crop or grain
____ Orchards, vineyards or other permanent crops.
_X__ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
____water plants: water lily, eelgrass, milfoil, other
____other types of vegetation

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

The project site has several emergent plant species that will be removed such as willows (Salix ssp.), cattails (Typha ssp.), marsh grasses, and currents (Ribes ssp.). Approximately 0.56 acres of vegetation will be removed.

Amended: The majority of these plant species have died since water is no longer discharged to this outfall.

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

No federal listed threatened or endangered species are known to be on the project site. However several plant species are listed by Washington State as threatened or endangered: These plants have been observed on the greater Hanford site, but none were observed on the proposed project site during field observations.

Scientific Name	Common Name	Status
Ammannia robusta	Grand red stem	Threatened
Astragalus geyeri	Geyer's milkvetch	Threatened
Calyptridium roseum	Rosy pussypaws	Threatened
Cuscuta denticulata	Desert dodder	Threatened
Eatonella nivea	White eaton ella	Threatened
Eriogonum codium	Umtanum desert buckwheat	Endangered
Gilia leptomeria/Aliciella leptomeria	Great basin gilia	Threatened
Lesquerel latuplashensis/ Physaria douglasii ssp. tuplashensis	White bluffs bladderpod	Threatened
Lipocarpha aristulata	Awned halfchaff sedge	Threatened
Loeflingia squarrosa var. squarrosa	Loeflingia	Threatened
Rotala ramosior	Lowland toothcup	Threatened
Rorippa columbiae	Persistentsepal yellowcress	Endangered
Spiranthes diluvialis	Ute Ladies' Tresses	Endangered

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

~~*Native grasses will be hydroseeded over the disturbed site once project is completed.*~~

Amended: None. The site will be covered with 3 inches of 1 1/4" minus crushed rock.

e. List all noxious weeds and invasive species known to be on or near the site.

Below is a list of noxious weeds that have been found around CGS.

Species	Common name

Acroptilon repens	Russian knapweed
Centaurea diffusa	Diffuse knapweed
Centaurea solstitialis	Yellow star-thistle
Centaurea stoebe	Spotted knapweed
Chondrilla juncea	Rush skeletonweed
Cirsium arvense	Canada thistle
Convolvulus arvensis	Field bindweed
Hypericum perforatum	Common St. Johnswort
Lepidium latifolium	Broadleaved pepperweed
Linaria dalmatica	Dalmatian toadflax
Myriophyllum spicatum	Eurasian watermilfoil
Phalaris arundinacea	Reed canarygrass
Tribulus terrestris	Puncturevine

5. **Animals**

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include:

birds: hawk, heron, eagle, songbirds, other:
mammals: deer, bear, elk, beaver, other: Rabbits
fish: bass, salmon, trout, herring, shellfish, other _____

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

No federal listed threatened or endangered species have been observed on the project site. However, several Washington State threatened and endangered species have been observed in the greater Hanford area.

Scientific Name	**Common Name**	**State Status**	**Federal Status**
Birds			
Buteo regalis	Ferruginous hawk	Threatened	
Centrocercus urophasianus	Greater sage grouse	Threatened	
Grus canadensis	Sandhill crane	Endangered	
Pelecanus erythrorhynchos	American white pelican	Endangered	
Mammals			
Brachyagus idahoesis	Pygmy rabbit	Endangered	Endangered
Fish			
Oncorhynchus mykiss	Steelhead		Threatened
Oncorhynchus tshawytscha	Spring-run Chinook		Endangered
Salvelinus confluentus	Bull trout		Threatened

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

Yes. CGS is part of the Columbia River drainage, a segment of the Pacific Flyway, a migratory bird route. The greater Hanford area and the Columbia River serve as a resting area for various migratory birds, waterfowl, and shorebirds.

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

None. Amended: However, construction will not occur if birds subject to the Migratory Bird Treaty Act are observed to be present in the project area.

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

No invasive animal species are known to be on or near the project site.

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.

None.

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.

Yes. The project site is located in a Radiological Controlled Area (RCA) and there is a potential for exposure for workers on the site during construction. Energy Northwest has proceduress in place to ensure a safe working environment. Workers will be properly trained before entering the site. During construction there is a small chance of exposure to chemicals from gasoline, oils, and other related materials needed for construction. Some of these

chemicals are flammable and may result in a fire, explosion, spill, or exposure to hazardous waste. Using prudent construction practices will limit the possibility of exposure or spill.

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

The project site was used for over 30 years to discharge stormwater and wastewater for CGS operations. Soil core sampling in 2011 detected low level residual radioactivity for Cobalt-60 and Cesium-137 in the upper layers of sediment and soil of the SDP. Of the 909 soil samples taken, radioactivity was only detected in 2 percent of the samples. Other residual radionuclides were detected, but all were short-lived, at lower concentration, and limited distribution in the SDP soil. Vegetation was also sampled for residualradioactivity, and none was detected. ~~Using Hanford radiological cleanup guidelines published by Washington Department of Health (WDOH), the SDP could be released for public use in its current condition under the commercial/industrial use scenario but not under rural residential scenario. Since the project site is located inside the CGS security boundary rural residential release wouldn't apply.~~

Metals were also screened and compared to Hanford area background levels. Silver and copper were detected above background levels. Both of these metals were well below Environmental Protection Agency (EPA) Regional Screening Levels (RSL) and total hazard quotient (THQ).

Amended: Discussion comparing the SDP to Hanford cleanup guidelines has been removed.

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.

There are no hazardous chemicals/conditions that will affect project development. There are no underground hazardous liquid or gas transmission pipelines in the immediate area of the project site.

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.

No toxic or hazardous chemicals will be stored, used, or produced on site once construction is finished. During construction, diesel fuel and gasoline will be used. No other chemicals will be used.

4) Describe special emergency services that might be required.

None anticipated.

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

During construction workers will be properly trained to work in a RCA. Prudent construction techniques, including ground watering, will reduce the threat to

workers and the environment. A spill kit will be located on site to clean up any spills from heavy equipment.

b. **Noise**

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

None. The project site is located in an industrial area and noise will not affect the project.

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.

Increased levels of noise during construction are expected from this project created by construction equipment used for moving earth during hours between 7 am to 6 pm. No long-term noises will be created.

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

None.

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.

The project site is located in an existing industrial area and historcially used to discharge wastewater. The project site is adjacent to CGS and support facilities and will not affect current land uses on nearby properties.

b. Has the project 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?

No.

1) 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.

c. Describe any structures on the site.

No structures are currently located on the project site. Nearby structures includes the the newly constructed lined evaporation ponds, CGS reactor building, the turbine generator building, the radioactive waste building, the diesel generator building, six mechanical draft-cooling towers, and various office and support buildings.

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

No.

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

The site is unclassified by Benton County.

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

The Department of Energy (DOE) has designated the area as "Industrial" in the Hanford Comprehensive Land-Use Plan.

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 a critical area by the city or county? If so, specify.

No.

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

None.

j. Approximately how many people would the completed project displace?
None.

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

None.

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

None.

m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:

None.

9. **Housing**

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

None.

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

None.

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

None.

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 buildings will be constructed for this project.

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.

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

No.

c. What existing off-site 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?

The Columbia River is located 3 miles from the project site.

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:

None.

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.

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.

The CGS site was not used for homesteading or agriculture and was not developed with facilities supporting the Manhattan Project. Archaeological investigation of the CGS site were performed in 1972 prior to construction. No archaeological features or historic structures were observed at the reactor site, including the corridor between the river and the reactor site. Evidence of Native American presence was found in the vicinity of the makeup water pump house and water intake, but no substantive archaeological material. Use of the site area by Native Americans and early

settlers appears to have been transitory and focused on the river shoreline. The project site is located within the previously surveyed disturbed area. This area was altered significantly (excavation and fill) during construction of CGS and during subsequent maintenance operation activities. Professional studies on the site are listed below:

Hale, L.L., "Cultural Resources Report Narrative #98-0600-024, WPPSS Industrial Sites," Hanford Cultural Resources Laboratory, Richland, WA, 1998.

Rice, D.G, "Archaeoligical/Historical Reconnaissance WPPS Hanford No. 2 Reactor," Richland, WA 1972.

Rice, D.G, "Archaeological Investigations during Exavations for WNP-2 Pump house and Water Intake." Benton County. WA 1975.

Rice, D.G., "Archaeological Investigations at Washington Public Power Supply System Nuclear Plants on the Hanford Reservation, Washington." Richland, WA, 1983.

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.

Energy Northwest has procedural controls to assess and consider impacts to potential or existing historical and archaeological sites in accordance with state and federal regulations when planning and performing work activities. Procedural controls include review of historic construction photos and GIS data of previously surveyed and disturbed areas. The project site is located in a previously surveyed and highly disturbed site which should limit any impacts to historic or cultural resources.

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.

During construction, any archaeological findings, per procedure, will be reported to the DOE, the Washington Department of Archaeology and Historic Preservation (DAHP), EFSEC, and other interested parties or affected tribes identified by the DAHP. Energy Northwest agrees to consult with the DOE to arrange for preservation of artifacts and for interpretation of any archaeological site discovered in the course of construction.

14. **Transportation**

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

The project site has paved access off Route 4. The project site is located inside the CGS industrial area which is a secure site with limited access. Authorized individuals have paved access to the project site.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

No.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

None.

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

No.

e. Will the project or proposal 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 or proposal? 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?

None.

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.

No.

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, public transit, health care, schools, other)? If so, generally describe.

No.

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

None.

16. **Utilities**

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

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

No utilities are needed.

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: Shannon Khounnala

Name of signee Shannon Khounnala

Position and Agency/Organization Environmental & Regulatory Programs Specialist/Energy Northwest

Date Submitted: 2/5/15

Amended:

Signature: Shannon Khounnala

Date Amended: 9/23/15

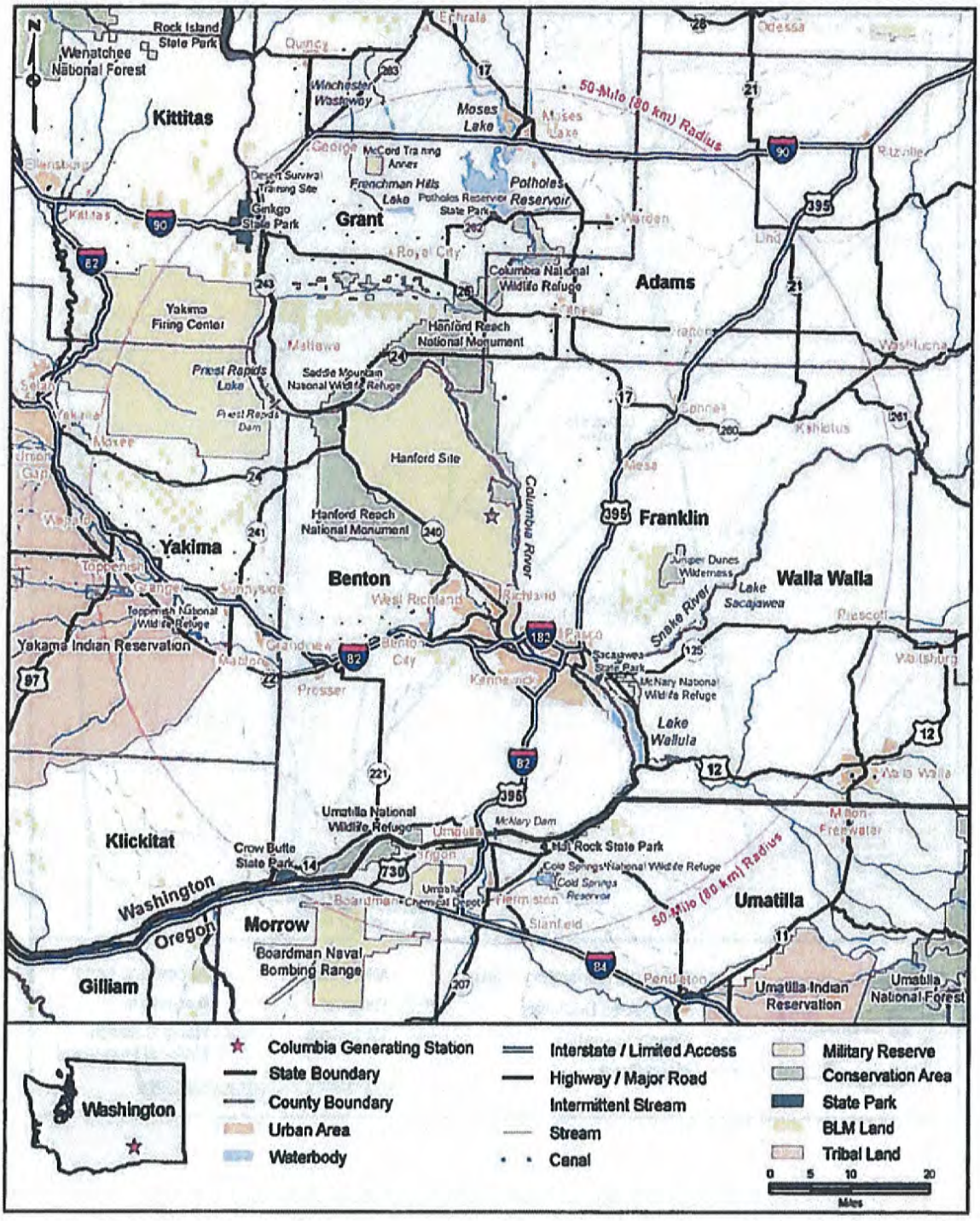

Figure 1- Site Vicinity

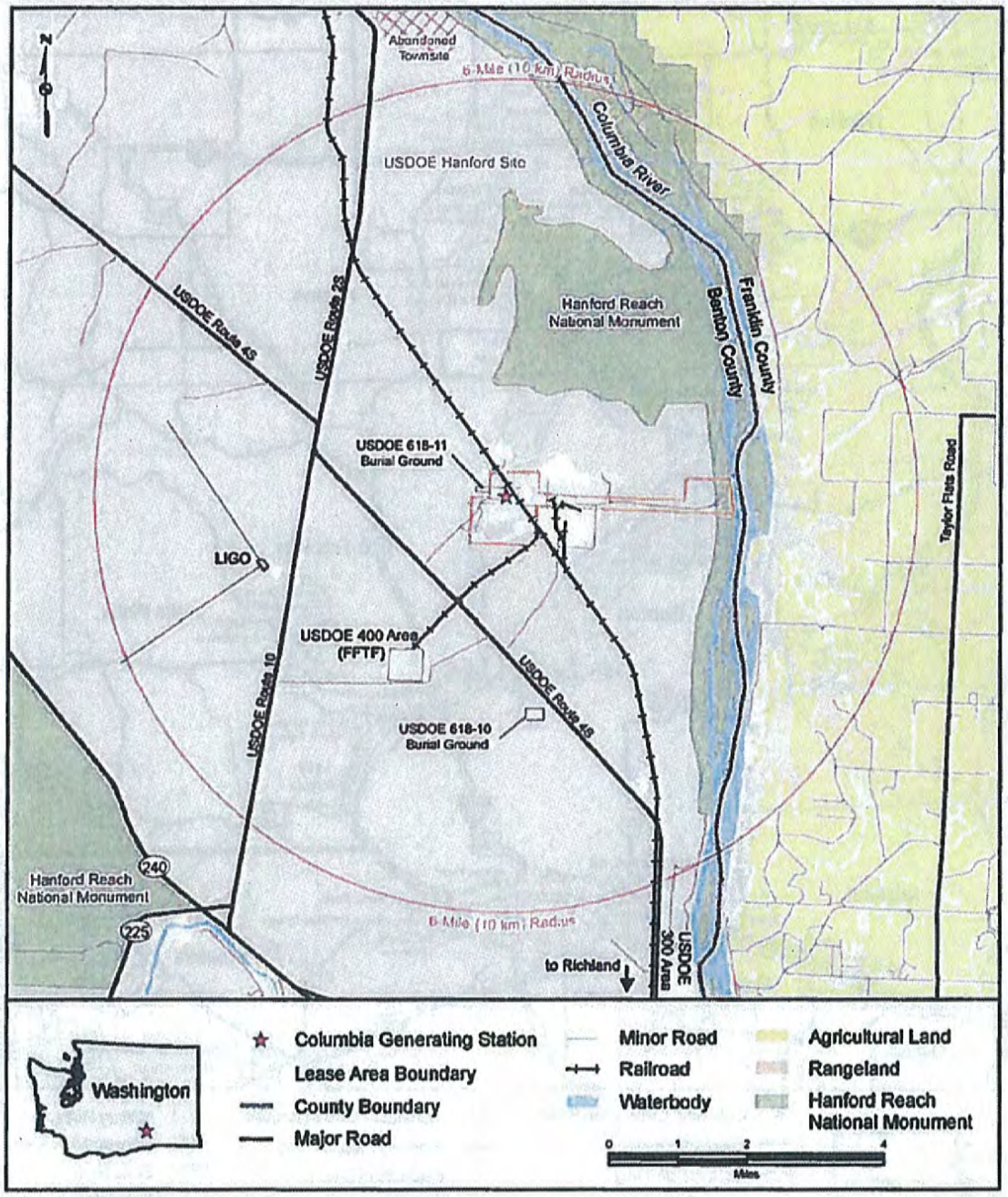

Figure 2- Project Area Map

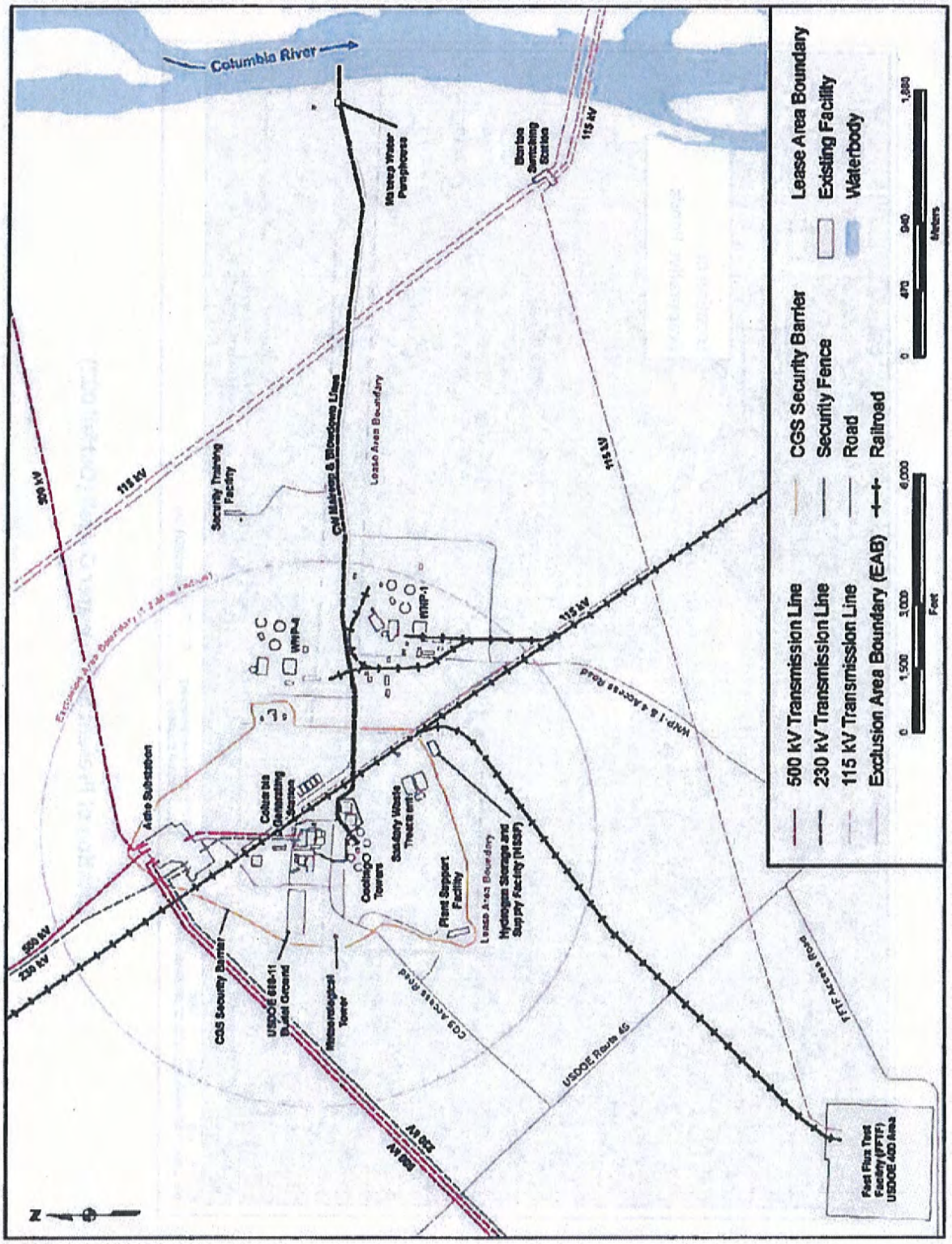

Figure 3- Site Area

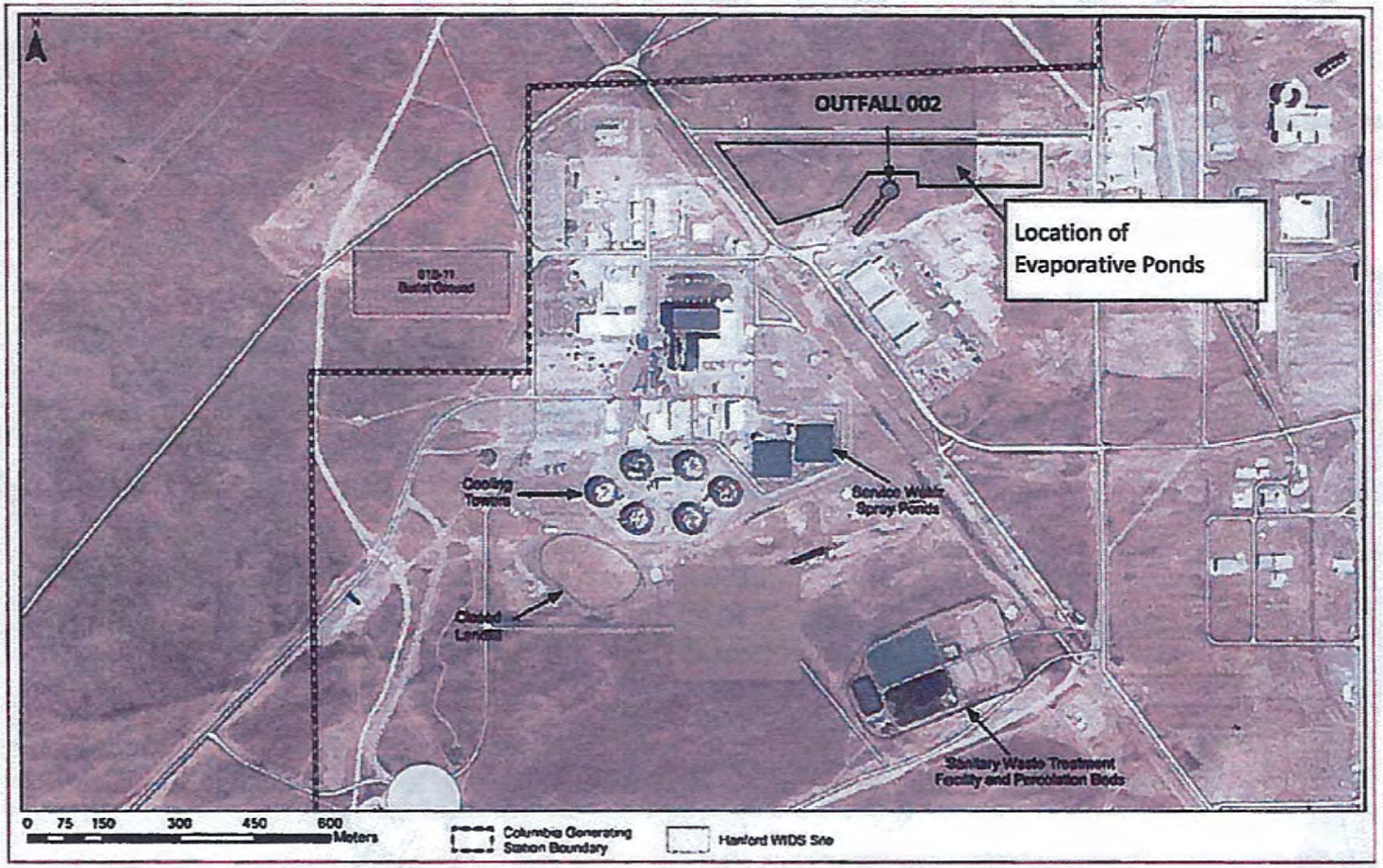

Figure 4-Aerial Photograph of Project Site.

Location of Present Storm water Outfall (Outfall 002)