POTENTIAL ACTION ITEM

Washington State
Energy Facility Site Evaluation Council

REVISED AGENDA

MONTHLY MEETING
Wednesday March 15, 2023
1:30 PM

VIRTUAL MEETING ONLY
Click here to join the meeting
Conference number: (253) 372-2181 ID: 56502492#

1. Call to Order ……Kathleen Drew, EFSEC Chair

2. Roll Call ……Andrea Grantham, EFSEC Staff

3. Proposed Agenda ……Kathleen Drew, EFSEC Chair

4. Minutes **Meeting Minutes**.....Kathleen Drew, EFSEC Chair

- February 15, 2023 Monthly Meeting Minutes

5. Projects

a. Kittitas Valley Wind Project

- Operational Updates……Eric Melbardis, EDP Renewables

b. Wild Horse Wind Power Project

- Operational Updates……Jennifer Galbraith, Puget Sound Energy

c. Chehalis Generation Facility

- Operational Updates……Michael Adams, Chehalis Generation

d. Grays Harbor Energy Center

- Operational Updates……Chris Sherin, Grays Harbor Energy

e. Columbia Generating Station

- Operational Updates……Denis Mehinagic, Energy Northwest
- Resolution Amendment…… Amy Moon, EFSEC Staff

The Council may consider taking FINAL ACTION on the Resolution Amendment for the Columbia Generating Station.

f. WNP – 1/4

- Non-Operational Updates……Denis Mehinagic, Energy Northwest

g. Columbia Solar

- Project Updates……Thomas Cushing, Greenbacker Capital

h. Horse Heaven Wind Farm

- Project Updates……Amy Moon, EFSEC Staff
- Adjudication Update……Adam Torem, Administrative Law Judge

i. Goose Prairie Solar

- Project Updates……Sara Randolf, EFSEC Staff

j. Badger Mountain

- Project Updates……Joanne Snarski, EFSEC Staff

k. High Top & Ostrea

- Project Updates……Ami Hafkemeyer, EFSEC Staff

l. Wautoma Solar

- Project Updates……Lance Caputo, EFSEC Staff

m. Hop Hill Solar

- Project Updates……John Barnes, EFSEC Staff

n. Carriger Solar

- Project Updates……Joanne Snarski, EFSEC Staff

6. **Adjourn**……Kathleen Drew, EFSEC Chair

Note: "FINAL ACTION" means a collective positive or negative decision, or an actual vote by a majority of the members of a governing body when sitting as a body or entity, upon a motion, proposal, resolution, order, or ordinance. RCW 42.30.020

WASHINGTON STATE

ENERGY FACILITY SITE EVALUATION COUNCIL

FEBRUARY 15, 2023

1:30 p.m.

Virtual Council Meeting

Verbatim Transcript of Proceedings

(All parties appearing via videoconference.)

REPORTED BY: Pam Nelson, RPR, CCR #2948

EFSEC 2023 Monthly Council Meetings
Energy Facility Site Evaluation Council, February Meeting - February 15, 2023 Pages 2..5

A P P E A R A N C E S

Councilmembers:
KATHLEEN DREW, Chair
ELI LEVITT, Department of Ecology
LENNY YOUNG, Department of Natural Resources
MIKE LIVINGSTON, Department of Fish and Wildlife
KATE KELLY, Department of Commerce
STACEY BREWSTER, Utilities and Transportation Commission
Local Government and Optional State Agencies for the Horse Heaven Project:
ED BROST, Benton County
Badger Mountain Project:
JORDYN GUILIO, Douglas County

Wautoma Solar Project:
DAVE SHARP, Benton County
PAUL GONSETH, Washington State Department of Transportation
Assistant Attorney General:
JON THOMPSON

Administrative Law Judges:
ADAM TOREM
LAURA BRADLEY
DAN GERARD

EFSEC Staff:
AMI HAFKEMEYER
AMY MOON
JOAN OWENS
ANDREA GRANTHAM
SONJA SKAVLAND
LISA MASENGALE
SARA RANDOLF
SEAN GREENE
LANCE CAPUTO
JOHN BARNES
OSTA DAVIS
JOANNE SNARSKI
(Continued on next page.)

A P P E A R A N C E S (Continued)

Operational Updates:
Kittitas Valley Wind, EDP Renewables:
ERIC MELBARDIS

Wild Horse Wind Power Project, Puget Sound Energy:
JENNIFER GALBRAITH
Grays Harbor Energy Center, Grays Harbor Energy:
CHRIS SHERIN

Chehalis Generation Facility, PacifiCorp:
MICHAEL ADAMS
Columbia Generating Station & WNP-1/4, Energy Northwest:
MARSHALL SCHMITT

Columbia Solar, TUUSSO Energy:
OWEN HURD
Counsel for the Environment:
SARAH REYNEVELD

In attendance:
TAI WALLACE, Cypress Creek Renewables

(Council meeting commenced at 1:30 p.m.)

CHAIR DREW: Good afternoon. This is Kathleen Drew, Chair of the Energy Facility Site Evaluation Council calling to order our February meeting.

Ms. Grantham, will you call the roll.

MS. GRANTHAM: Certainly.

Department of Commerce?

MS. KELLY: Kate Kelly, present.

MS. GRANTHAM: Department of Ecology?

MR. LEVITT: Eli Levitt, present.

MS. GRANTHAM: Department of Fish and Wildlife?

MR. LIVINGSTON: Mike Livingston, present.

MS. GRANTHAM: Department of Natural Resources?

MR. YOUNG: Lenny Young, present.

MS. GRANTHAM: Utilities and Transportation Commission?

MS. BREWSTER: Stacey Brewster, present.

MS. GRANTHAM: Local government and optional state agencies for the Horse Heaven Project, Department of Agriculture, Derek Sandison?

For Benton County, Ed Brost?

MR. BROST: Ed is here.

MS. GRANTHAM: Thank you.

For the Badger Mountain Project, Douglas County?

MS. GUILIO: Jordyn Guilio, Douglas County, present.

MS. GRANTHAM: For the Wautoma Solar Project for Benton County, Dave Sharp?

MR. SHARP: Dave Sharp, present.

MS. GRANTHAM: Washington State Department of Transportation?

MR. GONSETH: Paul Gonseth, present.

MS. GRANTHAM: The assistant attorney general, Jon Thompson?

MR. THOMPSON: I'm present.

MS. GRANTHAM: Administrative law judge, Adam Torem?

JUDGE TOREM: This is Judge Torem. Can you hear me okay?

MS. GRANTHAM: Yes, we can. Thank you.

JUDGE TOREM: I'm present.

MS. GRANTHAM: Laura Bradley?

JUDGE BRADLEY: Judge Bradley is present.

MS. GRANTHAM: Thank you.

Dan Gerard?

MR. GERARD: Present as well. Thank you.

MS. GRANTHAM: For EFSEC staff, Sonia Bumpus?

Ami Hafkemeyer?

MS. HAFKEMEYER: Ami Hafkemeyer, present.

Page 6

MS. GRANTHAM: Amy Moon?
MS. MOON: Amy Moon, present.
MS. GRANTHAM: Patty Betts?
Stew Henderson?
Joan Owens?
MS. OWENS: Present.
MS. GRANTHAM: Dave Walker?
Sonja Skavland?
MS. SKAVLAND: Sonja Skavland, present.
MS. GRANTHAM: Lisa Masengale?
MS. MASENGALE: Lisa Masengale, present.
MS. GRANTHAM: If you have an open mic, if you'd please make sure to mute it.
Next we have Sara Randolf?
MS. RANDOLF: Sara Randolf, present.
MS. GRANTHAM: Sean Greene?
MR. GREENE: Sean Greene, present.
MS. GRANTHAM: Lance Caputo?
MR. CAPUTO: Lance Caputo, present.
MS. GRANTHAM: John Barnes?
MR. BARNES: John Barnes, present.
MS. GRANTHAM: Osta Davis?
MS. DAVIS: Present.
MS. GRANTHAM: Joanne Snarski?
MS. SNARSKI: Joanne Snarski, present.

Page 7

MS. GRANTHAM: For the operational updates, Kittitas Valley Wind Project?
MR. MELBARDIS: Eric Melbardis, present.
MS. GRANTHAM: Wild Horse Wind Project?
MS. GALBRAITH: Jennifer Galbraith, present.
MS. GRANTHAM: Grays Harbor Energy Center?
MR. SHERIN: Chris Sherin, present.
MS. GRANTHAM: Chehalis Generation Facility?
MR. ADAMS: Mike Adams, present.
MS. GRANTHAM: Columbia Generating Station?
MR. SCHMITT: Marshall Schmitt, present.
MS. GRANTHAM: Columbia Solar?
MR. HURD: Owen Hurd, present.
MS. GRANTHAM: And do we have someone for the Counsel for the Environment?
MS. REYNEVELD: Sarah Reyneveld, present.
MS. GRANTHAM: Thank you.
Chair, there is a quorum for the regular council, the Horse Heaven council, Badger Mountain council, and Wautoma Solar council. Thank you.
CHAIR DREW: Thank you.
Next item on to adopt is the proposed agenda. Is there a motion to adopt the proposed agenda?
MS. BREWSTER: Stacey Brewster. I move to adopt the proposed agenda.

Page 8

MR. YOUNG: Lenny Young, second.
CHAIR DREW: Thank you.
All those in favor, please say "Aye."
COUNCILMEMBERS: Aye.
CHAIR DREW: Those opposed?
The agenda is adopted.
Moving on to the meeting minutes. We'll start with the High Top and Ostrea continued use permit meeting from January 11. Is there a motion to approve the minutes of that meeting?
MS. KELLY: Kate Kelly, motion to approve.
CHAIR DREW: Thank you.
Second?
MR. LIVINGSTON: Mike Livingston, second.
CHAIR DREW: Okay. I have a few changes for the set of minutes. There are a few places throughout where "Ostrea" - O-S-T-R-E-A - is spelled "Ostra" - O-S-T-R-A; so those should be changed. On page 6, line 14, that's one of those places, but there are a couple others throughout.
Page 11, line 5, "sheep" - S-H-E-E-P - should be "cheat" - C-H-E-A-T; page 11, line 9, "counsel" - C-O-U-N-S-E-L - should be the "council" - C-O-U-N-C-I-L; page 11, line 12, "property" should be changed to "proper"; page 15, line 14, "remained" should be changed to "remaining."

Page 9

Those are the changes that I have. Are there any other changes from any councilmembers?
MS. BREWSTER: This is Stacey Brewster.
On page 11, line 22, the word "siding" - S-I-D-I-N-G - should read "siting" - S-I-T-I-N-G.
CHAIR DREW: Thank you.
Any others?
All those in favor of amending the minutes and approving them with those changes, please say "Aye."
COUNCILMEMBERS: Aye.
CHAIR DREW: Opposed?
The minutes are approved as amended.
Moving on to the January council meeting minutes. Is there a motion to approve the January 18 council meeting minutes?
MR. YOUNG: Lenny Young, so moved.
CHAIR DREW: Thank you.
Second?
MS. BREWSTER: Stacey Brewster, second.
CHAIR DREW: I have a few changes. The first I have is on page 11, line 6. The word "weren't" should be changed to the word "were," W-E-R-E.
Line 8 are a couple of changes; add the word "to" - T-O - after "Paul" and the word "to" - T-O - after "Olympia"; delete the word "sub." And on line 9, delete the word "or"

Page 10

and change "line" to "lines."
On page 15, line 11, the letters F-C-A should be S-C-A; on page 20, line 5, the initials R-A-S-C should be changed to the word "or" and the initials A-S-C; on page 21, line 22, the unidentified speaker is, in fact, Ami Hafkemeyer.
Are there any other changes?
MS. BREWSTER: This is Stacey Brewster.
On page 11, line 3, "land" should be replaced with the word "plant."
CHAIR DREW: Thank you.
Any other changes?
Okay. Hearing none - you've heard the amendments - all those in favor of amending the minutes with these corrections and approving them, please say "Aye."
COUNCILMEMBERS: Aye.
CHAIR DREW: Opposed?
The minutes are approved as amended.
We will now move on to the operational updates. Kittitas Valley Wind Project, Mr. Melbardis.
MR. MELBARDIS: Good afternoon, Chair Drew, EFSEC council, staff. This is Eric Melbardis with EDP Renewables for the Kittitas Valley Wind Power Project. We have nothing nonroutine to report.
CHAIR DREW: Thank you.

Page 11

Wild Horse Wind Power Project, Ms. Galbraith.
MS. GALBRAITH: Thank you, Chair Drew, EFSEC staff -- (inaudible).
CHAIR DREW: I'm sorry. We're having trouble hearing you. If you can speak into the mic.
MS. GALBRAITH: Can you hear me now?
CHAIR DREW: Much better. Thank you.
MS. GALBRAITH: Okay. Thank you.
Jennifer Galbraith with Puget Sound Energy representing the Wild Horse Wind Power Facility, and I have nothing nonroutine to report for the month of January.
CHAIR DREW: Thank you.
Chehalis Generation Facility, Mr. Adams.
MR. ADAMS: Good afternoon, Chair Drew, EFSEC council, and staff. For the record, this is Mike Adams, plant manager representing Sifcor and the Chehalis Generation Facility. I have nothing nonroutine to report for the month of January 2023.
CHAIR DREW: Thank you.
Grays Harbor Energy Center, Mr. Sherin.
MR. SHERIN: Good afternoon, Chair Drew, councilmembers, and EFSEC staff. For the month of January, I have nothing nonroutine to report.
CHAIR DREW: Thank you.
Columbia Generating Station, Mr. Schmitt.

Page 12

MR. SCHMITT: Good afternoon, Chair Drew, EFSEC council, and staff. For the record, this is Marshall Schmitt reporting for Energy Northwest.
For January 2023, I only have one item to report, and that is on January 9th and 10th, the Washington State Patrol Fire Protection Bureau completed the annual 2022 fire inspection of the Energy Northwest Industrial Development Complex and nonpower block buildings at Columbia Generating Station. The reinspection is going to be scheduled for later this year to evaluate the closure of some of the actions that came up. I have no other items to report for January.
CHAIR DREW: Thank you.
Project updates, Ms. Moon.
MS. MOON: Good afternoon and thank you, Chair Drew and councilmembers. For the record, this is Amy Moon, EFSEC staff member, providing an update on the EFSEC council Resolutions 299 and 332.
Resolution 299 is for the Columbia Generating Station, which we call CGS for short - it's for their cooling system sediment disposal - and Resolution 332 is for the CGS radiological environmental monitoring program.
These two resolutions include radionuclide air monitoring using dosimeters. In the environmental program at CGS, dosimeters are used to measure the ambient radiation

Page 13

dose in the environment. As explained to me by a radiation health physicist at the Washington Department of Health, this is the dose in air at a specific location from cosmogenic sources from soil and external dose from a source containing radioactive material.
These small devices are made from a crystalline solid which trap electrons that are later freed from traps in the crystals and measured in the laboratory. The current EFSEC Resolutions 299 and 332 specify Energy Northwest must use thermal luminescent dosimeters, or TLDs. The dose measurement technology has evolved since those resolutions were signed and issued, and the more recent technology uses optically stimulated luminescent - or OSL - dosimeters.
OSLs and TLDs are very similar with the difference being in how the electrons captured on the crystals are freed from their traps. TLDs use heat to release the electrons, and OSL technology uses lasers. Both capture the light emitted, and the dose is calculated from the intensity of the emitted light.
OSLs have a few advantages, including the ability to reread the dosimeters. They are less sensitive to changes in environmental conditions. That's a consideration in the hot summers. And there is a cost savings with this technology.
Energy Northwest is adopting the newer OSL technology,

Page 14

thus requiring the update of two EFSEC resolutions to match the current practice and methods listed in Energy Northwest's operating documents, such as the Offsite Dose Calculation Manual.

EFSEC staff is working on amending Resolutions 299 and 332 to update the dosimeters specified for the full-time monitoring of direct radiation and plan to present the amended resolutions to the EFSEC council at the March 2023 council meeting. In preparation for the updated resolutions, I'm presenting the background information on the amendment today.

The change in dosimeters will continue to meet the Nuclear Regulatory Commission requirements as published in the NRC Regulatory Guide 4.13 for environmental dosimetry, including meeting the American National Standards Institute, otherwise known as A-N-S-I or ANSI. It will meet the performance testing and procedural specifications for dosimetry and environmental applications.

The NRC approved the license basis documents which noted the change from thermal luminescent dosimeters to optically stimulated luminescent dosimeters.

The Washington Department of Health provides technical oversight for the radiological environmental monitoring program and is aware of the dosimeter update and has no concerns or objections. The Department of Health switched

Page 15

to OSL dosimeters in 2012.

EFSEC staff plan to present the proposed amendments to Resolutions 299 and 332 at the March 15th council meeting.

Does council have any questions on that lengthy background explanation?

CHAIR DREW: Are there any questions from councilmembers?

MR. YOUNG: Amy, this is Lenny Young. Is there any way in which the older thermal and stipulated dosimeters are superior to the newer OSLs?

MS. MOON: Not to my knowledge.

MR. YOUNG: Thank you.

MS. MOON: They both determine the dose of record. It's just a matter of how that's done, and the fact that the OSLs can be read more than once is a plus.

MR. YOUNG: Understood. Thank you.

MS. MOON: You're welcome.

CHAIR DREW: Other questions from councilmembers?

We look forward to getting the amendments to the resolutions in our packets for next month's meeting. Thank you for giving us a preview.

MS. MOON: You're welcome.

CHAIR DREW: NPDES permit, Ms. Moon.

MS. MOON: Okay. That's me again.

So good afternoon council, Chair Drew, councilmembers.

Page 16

This is Amy Moon, once again, providing an update on the National Pollutant Discharge Elimination System - or NPDES - permit at the Columbia Generating Station.

As I outlined in the January 2023 council meeting, the current NPDES permit was scheduled to expire on October 31st of 2019. However, the permit was administratively extended on September 13, 2019, after accepting the renewal application on August 6th of that year, in accordance with the Washington State Administrative Procedures Act, which is RCW 34.05.422(3) - that's the citation - and the Washington Administrative Code 463-76-061(4).

In terms of compliance with the State Environmental Policy Act - or SEPA - which is spelled out S-E-P-A, the NPDES permit does not require a new SEPA threshold determination per the Revised Code of Washington code number 43.21 C.0383, as the proposed changes meet the intent and purpose of the existing NPDES permit.

Your February 15th, 2023 council packet contains the draft NPDES permit and draft fact sheet. You should have had some time to review that.

And do you have any questions on the draft permit or fact sheet at this time?

CHAIR DREW: Are there any questions about the draft permit or fact sheet?

Hearing none, continue.

Page 17

MS. MOON: Thank you. Since there are no questions, I'll just continue with the staff request.

We are requesting the council take action on a tentative determination to approve the draft NPDES permit, which would allow staff to notice the draft NPDES permit and fact sheet for a minimum 30-day public comment period. I am also suggesting that EFSEC wait until the end of the public comment period to determine if a public hearing should be scheduled based on comments received.

Does council have any questions before you take action?

CHAIR DREW: Any questions?

Is there a motion to tentatively approve the NPDES permit for Columbia Generating Station pending the public comments? Motion?

UNIDENTIFIED COUNCILMEMBER: Motion to approve.

CHAIR DREW: Thank you.

Second?

UNIDENTIFIED COUNCILMEMBER: Second.

CHAIR DREW: Thank you.

Any other comments?

All those in favor, please say "Aye."

COUNCILMEMBERS: Aye.

CHAIR DREW: Opposed?

The motion is adopted. Thank you.

Next we have Columbia Solar Project updates, Mr. Hurd.

MR. HURD: Good afternoon, Chair Drew, councilmembers, the EFSEC staff. This is Owen Hurd with TUUSSO Energy reporting on the Columbia solar projects for the month of January.

For Penstemon and Camas, which are both currently operational, the total generation was 324 megawatt hours and 309 megawatt hours, respectively. And then for the final project, Urtica, we did achieve substantial completion last week; so that's also now operational.

We've reached conceptual agreement on our planting plan revisions, which are now being finalized into a memo for EFSEC staff to review.

And then two other points to mention: We will be scheduling our next Tacoma meeting, and probably in the next month; and then the final thing I wanted to introduce, Thomas Cushing from Greenbacker, who will be presenting these reports going forward.

I believe Thomas is on the line if he wants to say hello; otherwise, you'll hear from him next month.

CHAIR DREW: Okay. Thank you.

Please introduce yourself.

MR. HURD: He might be on mute.

CHAIR DREW: If he's on; otherwise, we look forward to hearing from him, and we will miss hearing from you.

MR. HURD: Thanks. Thank you.

CHAIR DREW: Okay. Moving on to the Horse Heaven Wind Farm Project update, Ms. Moon.

MS. MOON: Once again, good afternoon, council, Chair Drew, and councilmembers. This is Amy Moon, the EFSEC staff member. I'm providing a draft environmental impact statement - or draft EIS - update on the Horse Heaven Wind Project.

The public comment period for the draft EIS closed February 1st of 2023 just before midnight, at 11:59 p.m., after a 45-day public comment period. Comments received during the comment period, including those received by email and U.S. mail, were uploaded to the comment database. The comments are available for council review in the EFSEC SharePoint site under the Council Review/Horse Heaven tab and are also posted to the EFSEC Horse Heaven Wind Project public website for council and public access.

We received approximately 2,430 comments during the draft environmental impact statement comment period, including those received by email and U.S. mail, during that comment period. Oral comments made during the February 1st draft EIS public comment hearing have not been posted yet and will be posted once we receive the hearing transcript from the court reporter and have a chance to separate out the individual comments to post from the individual

speakers.

EFSEC staff, in coordination with our consultant Golder WSP, are reading all comments received, organizing comments by topic, and determining the next steps required for the development of a final EIS. Additional information gathering and analysis thereof is anticipated, but it is too early to speak definitively on what that will consist of.

Does the council have any questions?

CHAIR DREW: My question is you likely have repeat comments both in the written comments and in the hearing comments, are those combined or listed separately?

MS. MOON: Well, so I'm not sure what you mean by "repeat." People submitted written comments, but then, at the oral hearing, speakers can provide comments, and those comments that were received at the hearing will be uploaded. We're not going to check to see if a written comment was verbatim from what an oral speaker presented at the hearing.

CHAIR DREW: Okay. So you'll have both comments, the written and the oral, separately. Okay.

MS. MOON: Yeah, I don't think that it's real intuitive on -- or maybe Andrea or Joan would be able to say, on that comment database, how you can tell the difference between what was an oral comment at the hearing versus what we received as a written comment.

CHAIR DREW: Will they be classified differently

in our -- or listed separately?

MS. MOON: I need Joan or Andrea to address that since they are the gurus.

CHAIR DREW: We're asking now.

MS. OWENS: Chair Drew, this is Joan Owens. So we are still sorting through a lot of the comments. It is fairly clear, when you look at them, which ones were submitted through the database, which ones were submitted through the transcript just by the formatting. So if you want to have a look at those and let us know if you need us to identify them further, we can look at that.

CHAIR DREW: Okay. I just thought it might be helpful to the council so that, as they are reading comments, they note the ones that came in orally in the public meeting separately from the written comments.

MS. OWENS: We'll try to identify those for you.

CHAIR DREW: Okay. Thank you.

Are there other questions or comments from councilmembers?

Okay. I know a lot of cataloging and identifying work is going on, as well as then reviewing the content. So thank you for all of that.

Moving on to the --

JUDGE TOREM: Chair Drew, before we move on --

CHAIR DREW: Yes.

Page 22

JUDGE TOREM: This is Judge Torem. I just want to be clear, for all those listening, the label of a comment as verbal or written or otherwise is simply for us to know the context in which it was made, but all comments will be treated the same substantively under the law for SEPA and, similarly, under any of the 80.50 laws regarding commenting during the adjudication. So I just want to make sure the public that's listening and all other parties understand that all comments are given the same weight regardless of the format.

CHAIR DREW: Thank you, Judge. I appreciate that. And that's absolutely true. It was simply a way for councilmembers to be able to review in the context. Appreciate that very much.

JUDGE TOREM: You're welcome.

CHAIR DREW: Okay. Moving on to the Goose Prairie Solar Project update, Ms. Randolf.

MS. RANDOLF: Good afternoon -- thank you. Good afternoon, Chair Drew, councilmembers, and staff. For the record, this is Sara Randolf, the site specialist for Goose Prairie Facility.

Last month the ISRP - initial site restoration plan - was approved by the council. EFSEC staff are continuing to receive and review documents being sent by the certificate holder for pre-construction plans. Staff will update the

Page 23

council as things progress.

Are there any questions?

CHAIR DREW: Any questions?

Thank you.

Badger Mountain Project update, Ms. Hafkemeyer.

MS. HAFKEMEYER: Thank you. For the record, this is Ami Hafkemeyer.

I'm sorry. Are we on Badger Mountain?

CHAIR DREW: Yes.

MS. HAFKEMEYER: Okay. EFSEC staff are anticipating the responses to the data requests from the applicant in the coming weeks, which will be reviewed in support of the draft environmental impact statement, or EIS.

Staff continue to work with our contractor and contracted agencies and to the applicant in the evaluation of impacts and identification of mitigation in the draft EIS.

Are there any questions?

CHAIR DREW: Thank you.

Whistling Ridge Project update, Ms. Hafkemeyer.

MS. HAFKEMEYER: Thank you. Again, for the record, this is Ami Hafkemeyer.

EFSEC staff are waiting for the certificate holder to submit the remaining materials for the FSCA amendment request. There are no further updates at this time.

Page 24

CHAIR DREW: Thank you.

High Top and Ostrea staff recommendation, Ms. Hafkemeyer.

MS. HAFKEMEYER: Thank you. Again, for the record, this is Ami Hafkemeyer.

The council has in their packets the draft report to the governor prepared by staff at the direction of the council and in coordination with our attorney general, Jon Thompson, and the administrative law judge for the project, Judge Bradley. We also provided a copy of the draft site certification agreements - or SCAs - for each facility. The draft report was open for public comment ahead of the council action today, and we received four comments. None of the comments received prompted changes in the draft documents.

Staff did receive some edits from councilmembers over the last week, and they are as follows: The word "August" was deleted from section 6, item 21; and the date has been corrected under section 6, item 25, to "2023." There were two instances where Councilmember Young's name was stated as "Leonard Lenny Young," with "Lenny" in quotations, on page 9 and on the signature page. This has been revised in both instances to correctly state Councilmember Young's name as Lenny Young.

There was another revision to the draft which was sent

Page 25

to the council yesterday. Initially, staff had identified tribal engagement text in a separate report that was intended to be included in the package to the governor. After further discussion, we have included that language into this report, and this is the new section 3(b). The following subsections within section 3 had been relettered accordingly.

At this time, staff recommend that the council vote to approve the draft report to the governor and direct staff to prepare the package of documents, including the report and draft site certification agreements, for delivery to the governor's office.

Are there any questions?

CHAIR DREW: Are there any questions?

A lot of information in this packet.

Is there a motion to recommend to the governor approval of the Cypress Creek Renewables application?

MS. BREWSTER: Stacey Brewster, so moved.

CHAIR DREW: Is there a second?

MR. YOUNG: Lenny Young, second.

CHAIR DREW: Thank you.

And I will read what the actual motion in full should say: The council recommends that the governor of the state of Washington approve Cypress Creek Renewables, LLC's, application dated April 7, 2022 for site certification,

Page 26

authorizing its subsidiary High Top Solar, LLC to construct and operate the High Top solar project, and authorizing its subsidiary Ostrea Solar, LLC, to construct and operate the Ostrea solar project.

There is a motion before the council. Are there any comments? questions?

MR. LIVINGSTON: Chair Drew, Mike Livingston.

CHAIR DREW: Go ahead, Mr. Livingston.

MR. LIVINGSTON: Yeah, Chair, I wanted to first thank the company representatives and EFSEC staff for working with WDFW staff on allowing for some wildlife connectivity between the solar arrays. I know there was some significant back-and-forth and dialog there. I appreciate that and seeing that in the final documents and, also, for the plan for some offsite mitigation as we move forward with the project.

I'm going to also just say -- and I'm supportive. I want to reiterate some of the concerns I expressed early on about these projects in these areas with habitat connectivity and as we review current other projects that are before us and new ones that may pop up. I think we need to continue to think about accumulative effects in this area and what that means for wildlife connectivity as we go forward.

So I just wanted to get those in the record. Thank

Page 27

you.

CHAIR DREW: Thank you.

Mr. Levitt.

MR. LEVITT: Yeah. Hi, Chair Drew and EFSEC staff. I'm curious -- you know, the HEAL Act passed the legislature in 2021, and it requires six or seven agencies to do environmental justice assessments, among other things, and I don't believe EFSEC is one of those agencies. However, I'm curious if EFSEC staff have taken the time to look at communities around this project or other proposed projects to get a better understanding of, you know, whether materials might need to be translated into other languages, et cetera, to make sure we are reaching out to the people in the community who are impacted and need to understand the information about the proposed projects.

CHAIR DREW: Thank you for your question. We are not one of the agencies that are required to plan under the HEAL Act, but we are doing everything we can to comply with the requirements. I do know -- I believe that some of the materials were translated, but I will ask Ms. Hafkemeyer to answer that question more fully.

MS. HAFKEMEYER: Thank you. We have established the contract going forward for translation services and making sure that we are translating notices for meetings, and other related project actions is something we are

Page 28

currently working into our process and is improving slowly but surely.

CHAIR DREW: And, also, in terms of environmental justice, that is one of the reasons I asked for the tribal engagement work that has been completed to be in this document that is going to the governor to show the tribal engagement work in a transparent manner so all understand the conversations that have taken place and the changes in the SEPA document, which took place because of that engagement as well.

MR. LEVITT: Yeah. Thank you, Ami and Chair Drew. I guess I'll just mention that if anyone on your team would like to learn more of how Ecology uses two different tools, one is called EPA's EJ screen - Environmental Justice screen - and another is Washington Department of Health's Environmental Health Disparities Map, or some people call it the Washington Tracking Network, I'd be happy to provide context if people are interested in learning more about those tools.

CHAIR DREW: Thank you.

Are there any comments or questions from councilmembers?

Okay. Hearing none, we will call the roll on the adopting of the report to the governor on Application No. EF220212.

Page 29

Ms. Grantham?

MS. GRANTHAM: Certainly.

Chair Drew?

CHAIR DREW: Aye.

MS. GRANTHAM: Department of Commerce, Kate Kelly?

MS. KELLY: Aye.

MS. GRANTHAM: Department of Ecology, Eli Levitt?

MR. LEVITT: Aye.

MS. GRANTHAM: Department of Fish and Wildlife, Mike Livingston?

MR. LIVINGSTON: Aye.

MS. GRANTHAM: Department of Natural Resources, Lenny Young?

MR. YOUNG: Aye.

MS. GRANTHAM: And, finally, the Utility and Transportation Commission, Stacey Brewster?

MS. BREWSTER: Aye.

CHAIR DREW: Motion is adopted. Thank you.

And I also would like to thank the staff for the work that has gone into the review of this application and the information provided to us. Thank you very much.

Moving on to the Wautoma Solar Project update, Mr. Caputo.

MR. CAPUTO: Thank you, Chair Drew and

Page 30

councilmembers. For the record, my name is Lance Caputo, siting specialist assigned to the Wautoma facility.

In December of 2022, EFSEC sent the applicant a second request for additional information on the project. The applicant's response is due this week. We will assess the information so we can render the proper SEPA determination. Meanwhile, we are engaged in continual conversations with our consultants and the applicant.

CHAIR DREW: Thank you.

The Hop Hill Solar Project, Mr. Barnes.

MR. BARNES: Thank you, Chair Drew and councilmembers. For the record, this is John Barnes, EFSEC staff member for Hop Hill.

Thursday, February 23rd, 2023 is the date that has been decided for the Hop Hill public information meeting and land use consistency hearing. This will be a hybrid meeting, as an in-person as well as a virtual option via Teams will be available.

The location for the in-person meeting will be 3 Rivers Convention Center, Halls G and H. The address for the 3 Rivers Convention hall is 7016 West Grandridge Boulevard, Kennewick, Washington 99336. The schedule will include an open house from 5:00 p.m. to 5:30 p.m., informational public meeting 5:30 to 7:00 or last speaker, whichever is first, land use consistency hearing 7:00 p.m.

Page 31

to 8:00 p.m. or last speaker.

Please note that the land use consistency hearing will begin no later than 30 minutes after the conclusion of the informational public meeting, which may end before 7:00 p.m. Additional information can be found visiting the Hop Hill Project page of the EFSEC website.

Staff has begun the review of the Hop Hill application and have initiated coordination with the applicant, contracted agencies, tribal and technical staff, and as well as our review consultant WSP.

Are there any questions?

CHAIR DREW: Any questions?

That's next week. Thank you.

Moving on to Carriger Solar, Ms. Hafkemeyer.

MS. HAFKEMEYER: Thank you. For the record, this is Ami Hafkemeyer.

On Friday, February 10th, 2023, EFSEC received the application for the Carriger Solar Facility. The applicant is here today to give a brief introduction to the project, more detail on which will be provided at the public informational meeting. Staff are currently working to schedule this meeting and will update the council and the public as details become available.

Are there any questions?

CHAIR DREW: No?

Page 32

Go ahead.

MS. HAFKEMEYER: All right. If there are no questions, I'll hand the floor over to the applicant to introduce themselves to the council.

MR. WALLACE: Thank you, Ms. Hafkemeyer.

Good afternoon, Chair Drew, EFSEC council, Council for the Environment, and EFSEC staff. Thank you for the opportunity to introduce the Carriger Solar Project located in Klickitat County to the council today.

My name is Tai Wallace. I am the senior director of development in the Western Region for Cypress Creek Renewables. I'm standing in today for Lauren Altich (phonetic), who is our developer. She got pulled away from this call for an urgent matter, but I'm pleasured to be able to introduce Cypress again and this project.

So as the entity that owns this LLC, you know, I just want to give you a quick overview, but a further overview presentation and introduction of Carriger Solar will be added to the public information session and land use consistency hearing that's still to be scheduled. So, briefly, to introduce our team that will be engaged throughout this EFSEC process.

As I said, Lauren Altich, she will be the developer, and she's leading development for this project. Julia Alpert is our senior environmental manager supporting

Page 33

the environmental diligence and compliance on the Carriger Solar Project. Leslie McClain from Tetra Tech is our project manager and prime environmental consultant on the Carriger Solar Project. And Linda Atkins, who is our land use counsel representing the Carriger Solar Project on behalf of Davis Wright Tremaine, will be supporting us through this process.

Cypress Creek is a mission-driven integrated renewable independent power producer platform. We were founded in 2014, and we consist of a team of about 330-plus folks operating in three business units across the United States.

Cypress Creek's mission is powering a sustainable future one project at a time, and our values are our guideposts as we work across hundreds of individual projects in the U.S. These values consist of what we call the five Cs: care, courage, creativity, conviction, and collaboration.

CCR - Cypress Creek Renewables - currently focuses on solar and storage development, operations and management, and has developed over 12 gigawatts of solar projects across the U.S. to date.

As a fully vertically integrated independent power producer, we develop our own projects, we provide first- and third-party O&M services, and we provide first- and third-party fleet and operation services. Our O&M portfolio

includes over four gigawatts of assets under management and a world-class registered control center located in North Carolina with 24/7 365 remote operations capabilities to augment our own onsite operations. Our fleet also includes two gigawatts of operational projects representing 217 projects in 14 states, and we have a long-term owner mindset.

Now, for the project. Carriger Solar is located approximately three miles east of Goldendale, Washington, in Klickitat County, and is located mostly within the Klickitat County Energy Overlay Zone adjacent to the Bonneville Power Administration night substation. The project is planned as a 160-megawatt AC solar project with an option for an AC-coupled 63-megawatt battery energy storage system best located adjacent to the substation location onsite.

The project intends to interconnect to the Bonneville Power Administration transmission system at the BPA's 500 kV bus at night at CCR's secure transmission deliverability for the energy attributes from this project to the customer. We secured and executed a long-term optic agreement to deliver the energy and environmental attributes from this project, and that energy and environmental attributes will be delivered to a Washington-based customer if we should be approved for site certification.

Cypress Creek is taking a similar approach to siting the Carriger project as it did with Ostrea and High Top, and we have started with site control in a study area of over 2,100 acres with the intent to mitigate adverse or material impacts on a nonsignificant level. We are considering impacts and habitat connectivity in the siting as, you know, discussed by Mr. Livingston, and, you know, we are taking the same approach and care in how we develop our project.

We have been working on this project and doing developmental work and siting work, diligence, you know, community engagement since 2018 when we first submitted our interconnection application.

Our team looks forward to presenting the project to the EFSEC council and staff and working with stakeholders to secure site certification for this project. Thank you very much. Have a wonderful day.

CHAIR DREW: Thank you. Are there any questions?

MR. YOUNG: Yes. This is Lenny Young.

Mr. Wallace, could you quickly situate the project with respect to the Klickitat River.

MR. WALLACE: Certainly. I believe the Little Klickitat River -- you know, if I could, I would love to respond back to that in comments in writing. I don't have my maps in front of me to know the river, but we are aware of the fish hatchery which, I believe, sits on that

Little Klickitat River, and we are set back off of those and have created both state and federal buffers off of those waterways and have done the full delineation to identify, you know, potential for fish baring in all the tributaries that lead into that. But I believe we are just east of the fish hatchery on Fish Hatchery Road in Goldendale -- or outside of Goldendale.

MR. YOUNG: Thank you.

MR. WALLACE: Certainly.

CHAIR DREW: Thank you. Well, we look forward to the entire presentation when we set the public informational meeting, and thank you for your time presenting to us today.

MR. WALLACE: Thank you.

CHAIR DREW: With that, we have nothing else before us; so this meeting is adjourned.

(Meeting adjourned at 2:34 p.m.)

C E R T I F I C A T E

I, PAMELA J. NELSON, a Washington Certified Court Reporter, in and for the State of Washington, do hereby certify:

That the foregoing proceedings were stenographically reported by me and thereafter reduced to a typed format under my direction; that the transcript is a full, true and complete transcript of said proceedings, consisting of pages 1 through 36, to the best of my ability to discern comments via videoconference transmission;

That as a CCR in this state, I am bound by the Rules of Conduct as Codified in WAC 308-14-130; that court reporting arrangements and fees in this case are offered to all parties on equal terms;

That I am not a relative, employee, attorney or counsel of any party to this action, or relative or employee of any such attorney or counsel, and I am not financially interested in the said action or the outcome thereof;

That upon completion of signature, if required, the original transcript will be securely sealed and served upon the appropriate party.

IN WITNESS WHEREOF, I have hereunto set my hand this 28th day of February 2023.

PAMELA J. NELSON
PAMELA J. NELSON
Certified Court Reporter,
License No. 2948, in and for
the State of Washington,
residing at Olympia, WA

EFSEC Monthly Council Meeting – Facility Update Format

Facility Name: Kittitas Valley Wind Power Project
Operator: EDP Renewables
Report Date: March 7, 2023
Reporting Period: February 2023
Site Contact: Eric Melbardis, Sr Operations Manager
Facility SCA Status: Operational

Operations & Maintenance (only applicable for operating facilities)

- Power generated: 18276 MWh
- Wind speed: 6 m/s
- Capacity Factor: 26.9%

Environmental Compliance

- No incidents

Safety Compliance

- Nothing to report

Current or Upcoming Projects

- Nothing to report

Other

- No sound complaints
- No shadow flicker complaints

EFSEC Monthly Council Meeting – Facility Update

Facility Name: Wild Horse Wind Facility
Operator: Puget Sound Energy
Report Date: March 3, 2023
Report Period: February 2023
Site Contact: Jennifer Galbraith
SCA Status: Operational

Operations & Maintenance

February generation totaled 94,735 MWh for an average 34.09%.

Environmental Compliance

Nothing to report.

Safety Compliance

Nothing to report.

Current or Upcoming Projects

Nothing to report.

Other

Nothing to report.

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

EFSEC Monthly Council Meeting – Facility Update

Facility Name: Chehalis Generation Facility
Operator: PacifiCorp
Report Date: March 3, 2023
Reporting Period: February 2023
Site Contact: Mike Adams, Plant Manager
Facility SCA Status: Operational

Operations & Maintenance
-Relevant energy generation information, such as wind speed, number of windy or sunny days, gas line supply updates, etc.

- 179,214 net MW-hrs. generated in the reporting period for a capacity factor of 65.17%.

The following information must be reported to the Council if applicable to the facility:

Environmental Compliance
-Monthly Water Usage: 2,831,928 gallons
-Monthly Wastewater Returned: 1,286,553 gallons
-Permit status if any changes.

- No changes.

-Update on progress or completion of any mitigation measures identified.

- Nothing to report

-Any EFSEC-related inspections that occurred.

- Nothing to report

-Any EFSEC-related complaints or violations that occurred.

- Nothing to report

-Brief list of reports submitted to EFSEC during the monthly reporting period.

- Nothing to report

Safety Compliance
-Safety training or improvements that relate to SCA conditions.

- Zero injuries this reporting period for a total of 2769 days without a Lost Time Accident.

PACIFICORP
A BERKSHIRE HATHAWAY ENERGY COMPANY

Current or Upcoming Projects

-Planned site improvements.

- No planned changes.

-Upcoming permit renewals.

- Nothing to report.

-Additional mitigation improvements or milestones.

- Nothing to report.

Other

-Current events of note (e.g., Covid response updates, seasonal concerns due to inclement weather, etc.).

- Nothing to report.

-Personnel changes as they may relate to EFSEC facility contacts (e.g., introducing a new staff member who may provide facility updates to the Council).

- Nothing to report.

-Public outreach of interest (e.g., schools, public, facility outreach).

- Nothing to report.

Respectfully,

Mike Adams
Plant Manager
Chehalis Generation Facility

EFSEC Monthly Council Meeting – Facility Update

Facility Name: Grays Harbor Energy Center
Operator: Grays Harbor Energy LLC
Report Date: March 15, 2023
Reporting Period: February 2033
Site Contact: Chris Sherin
Facility SCA Status: Operational

Operations & Maintenance
-GHEC generated 220,423MWh during the month and 508,577MWh YTD.

The following information must be reported to the Council if applicable to the facility:

Environmental Compliance
-There were no emission, outfall, or storm water deviations, during the month.
-Routine monthly, quarterly, and annual reporting to EFSEC Staff.
- Monthly Outfall Discharge Monitor Report (DMR).
- Annual Emissions Inventory.

-Annual WA Tier II Emergency and Hazardous Chemical Inventory submitted to Grays Harbor County LEPC & Grays Harbor District #5.

Safety Compliance
- None.

Current or Upcoming Projects
-- Application for a Modification to the Air Operating Permit submitted to EFSEC in April. GHEC is currently authorized to operate under PSD Permit EFSEC/2001-01, Amendment 5 and Federal Operating Permit EFSEC/94-1 AOP Initial.

Other
-None.

EFSEC Monthly Council Meeting

Facility Name: **Columbia Generating Station (CGS) and Washington Nuclear Projects 1 and 4 (WNP 1/4)**
Operator: **Energy Northwest**
Report Date: **March 14, 2023**
Reporting Period: **February 2023**
Site Contact: **Mary Ramos**
Facility SCA Status: (Pre-construction/Construction/Operational/Decommission) **Operational**
Operations & Maintenance (only applicable for operating facilities)
CGS Net Electrical Generation February 2023: **774,540 MWh**

Environmental Compliance
On February 21, 2023, Energy Northwest (EN) discovered that a flow meter calibration required under the CGS National Pollutant Discharge Elimination System (NPDES) Permit exceeded the annual calibration time requirement. The task to calibrate the flow meter was inadvertently closed. NPDES permit section S2.C.5. states: "Calibrate flow-monitoring devices at a minimum frequency of at least one calibration per year" and the last calibration of the flow meter was on November 19, 2021. Therefore, the NPDES required calibration frequency of once per year was exceeded when the flow meter was not calibrated in 2022. The flow meter tracks potable water backwash to the on-site evaporation ponds and in no way impacts any discharge to the environment. The device was calibrated on March 2, 2023 and was found to be within specification and did not require adjustment. This will be reported in the February Discharge Monitoring Report due on March 15.

Volatile Organic Compound (VOC) and Toxic Air Pollutant (TAP) emissions from the Columbia Generating Station building 194 (Paint and Blast Shop) are governed by Energy Facility Site Evaluation Council (EFSEC) Order No. 837. During calendar year 2022 (CY22), the small quantity emission rate (SQER) for Methylene bis(phenyl isocyanate) (Chemical Abstract Service CAS Number 101-68-8) was exceeded. The SQER for Methylene bis(phenyl isocyanate) is 0.02 pounds per hour (lb/hr) per Table 1 of EFSEC Order No. 837. The calculated maximum emission rate for CY22 was 0.054 lb/hr. This permit exceedance is a result of human performance error; paint shop personnel did not follow the procedure to validate chemical consumption limits prior to using paint products. Corrective actions to prevent recurrence include: 1) re-training of paint shop personnel to discuss EFSEC Order No. 837 permit conditions and EN procedures to ensure compliance, 2) review of list of paint products used at the paint shop and evaluate potential to discontinue using products with very low limits, and 3) increased oversight by Maintenance Supervisor (monthly review of paint shop chemical consumption log). Additional information regarding the permit exceedance was included in the CY22 CGS Air Emissions Source Registration.

No other non-routine items to report.

Safety Compliance
None.

Current or Upcoming Projects
None.

Other
None.

WASHINGTON STATE
ENERGY FACILITY SITE EVALUATION COUNCIL (EFSEC)

RESOLUTION NO. 299, AMENDMENT NO. 1
COLUMBIA GENERATING STATION
COOLING SYSTEM SEDIMENT DISPOSAL

Nature of Action. In August 2001, the Council closed Resolution No. 278 and approved Resolution No. 299 authorizing the onsite disposal of cooling system sediments containing low levels of radionuclides at the Energy Northwest Columbia Generating Station subject to the conditions specified in Resolution No. 299, Attachment 1. This Amendment No. 1 to Resolution No. 299 updates the dosimeter used for full-time monitoring of direct radiation from a thermoluminescent dosimeter to an Optically Stimulated Luminescence (OSL) dosimeter.

Background. Operation of the open cooling water systems at Columbia Generating Station (CGS) causes radionuclides contained in the source water or entrained from plant emissions to become concentrated in the sediment that accumulates in features of the cooling systems (e.g., tower decks, tower basins, pump basins, spray ponds, piping and system components). The concentrations of radionuclides in the sediment often exceed the lower levels of detection for environmental measurements. This requires that the material be managed as low level radioactive waste when cooling system components are cleaned.

In March 1995, Energy Northwest (then the Washington Public Power Supply System) requested approval of its plan to dispose of contaminated cooling tower sediment onsite. This approval was sought under the existing regulatory framework (WAC 246-221-180) that provides for state review and approval of a site-specific disposal plan. After conferring with the Departments of Health and Ecology, the Council approved Resolution No. 278 on May 8, 1995.

In December 1995, Energy Northwest requested that the scope of the disposal authorization be expanded to include sediment removed from the service water spray ponds. In August 1996, the Council approved by motion the relocation of previously removed spray pond sediment to the designated onsite disposal area. In June 1999, Energy Northwest resubmitted a revised application for a long-term authorization to dispose of spray pond sediment onsite. In June 2000, Energy Northwest provided detailed responses to Department of Health questions concerning the revised application.

The Departments of Health and Ecology reviewed the Energy Northwest application and supplemental information for updates to Resolution 278 and its Attachment 1 and found that the proposed disposal plan for service water cooling system sediments provides sufficient protections for public health and the environment. This judgement was also based on a review of the five years of experience with onsite disposal of circulating cooling water system sediments. Accordingly, in August 2001, Resolution 278 and its attachment were replaced with Resolution 299 and its attachment.

Energy Northwest notified EFSEC in July 2022 that a change in the full-time monitoring of direct radiation by thermoluminescent dosimeter was replaced with an Optically Stimulated

Luminescence (OSL) dosimeter. Although the dosimeters function differently, the thermoluminescent dosimeter relies on heat and the optically stimulated luminescence dosimeter relies on optical stimulation, the accuracy and quality of the dosimeters remain the same. The new OSL meets the requirements of the American National Standards Institute (ANSI) Performance, Testing, Procedural Specifications for Thermoluminescence Dosimetry Environmental Applications (ANSI N545: 75(R1993) and the Nuclear Regulatory Commission (NRC) Regulatory thermoluminescent dosimeter specifications in NRC Guide 4.13 and will not affect the quality of the monitoring Radiological Environmental Monitoring Program (REMP). Council staff has recommended that the requirements of Resolution No. 299 and its Attachment No. 1, be superseded by this resolution, No. 299 Amendment No. 1, and its Attachment. This would change:

1. Replace the full-time monitoring of direct radiation by thermoluminescent dosimeters to Optically Stimulated Luminescence (OSL) dosimeters.

Resolution. The Council hereby amends Resolution No. 299 and its Attachment 1 to require full-time monitoring of direct radiation by Optically Stimulated Luminescence dosimeters as specified in Attachment 1 to this resolution amendment.

Dated and effective this 15th day of March, 2023.

Washington State Energy Facility Site Evaluation Council

By: _____

Sonia Bumpus, EFSEC Executive Director

Attachment 1. Onsite Disposal of Contaminated Cooling System Sediments

Resolution No. 299, Attachment 1
Columbia Generating Station
Onsite Disposal of Contaminated Cooling System Sediments

Resolution No. 299 authorizes the on-site disposal of sediments removed from cooling systems containing low levels of radionuclides at Energy Northwest's Columbia Generating Station (CGS). This authorization is contingent upon compliance with the following conditions:

1. **Disposal Area**:

   Sediment disposal is limited to disposal cells specifically constructed for this purpose. The cells are to be located in an inactive borrow pit located south of the CGS cooling towers. The corners of the disposal area shall be marked with posts and signs indicating the dedicated purpose of the area. Interim storage of sediment in containers is allowed.

2. **Disposal Area Dose Limit**:

   The disposal limits in Section 3 have been established to limit the annual dose directly attributable to this disposal operation to 15 mrem/year. This is the maximum dose above background that an individual would receive spending 2000 hours at the disposal site. Actual doses are expected to be much lower and should be maintained as low as reasonably achievable.

3. **Disposal Concentration Limits**:

   a. The following individual isotopic limiting concentrations have been established as the maximum values allowed for disposal:

Co-60	5 pCi/g
Mn-54	30 pCi/g
Zn-65	50 pCi/g
Cs-134	10 pCi/g
Cs-137	20 pCi/g

   b. Since these radionuclides may not occur alone, the combined concentrations of the radionuclides will also be limited such that the sum of the fractions of maximum concentration for each nuclide does not exceed unity:

   A+B+C+D+E # 1.0

   A = actual concentration ÷ maximum concentration Co-60 (5 pCi/g)
   B = actual concentration ÷ maximum concentration Mn-54 (30 pCi/g)
   C = actual concentration ÷ maximum concentration Zn-65 (50 pCi/g)
   D = actual concentration ÷ maximum concentration Cs-134 (10 pCi/g)
   E = actual concentration ÷ maximum concentration Cs-137 (20 pCi/g)

c. This will assure that the incremental dose will remain below 15 mrem/yr. If additional radionuclides are detected, individual limiting concentrations will need to be established with concurrence from the state Department of Health prior to disposal.

4. **Sample Analysis and Environmental Monitoring**:

Monitoring of the sediment and the disposal site will be conducted per Energy Northwest's standard environmental monitoring procedures and practices.

a. **Pre-Disposal Screening Criteria and Sample Requirements**:

1. Areas to be cleaned shall be sampled for pre-disposal screening. Sampling shall be conducted in a manner that discriminates among the areas to be cleaned (e.g., cooling tower basin samples are composited separately from tower deck samples). Wet composite samples shall be taken in sufficient quantity to support additional dry analysis that may be required as described below.

2. If the analysis results of a wet composite sample are less than 20% of the disposal limits listed above and no other man-made radionuclides are found, the sediment from the respective area may be placed in the disposal cell without further pre-disposal analysis.

3. If the analysis results of a wet composite sample are equal to or greater than 20% of the disposal limits listed above, the same sample (or a split of the same sample) shall be dried and reanalyzed. If the dry results are less than the disposal limits and no other man-made radionuclides are found, the sediment from the respective area may be placed in the disposal cell.

4. If the analysis results of a dried composite sample exceed the disposal limits, the material shall be held for decay before it is disposed onsite or it shall be disposed by other means such as burial in a licensed low-level radioactive waste disposal facility.

5. If requested, Energy Northwest shall provide the state a split of any sample taken for analysis.

b. **Routine Disposal Cell Monitoring**:

1. Direct Radiation Dose Rate - An Optically Stimulated Luminescence (OSL) dosimeter station shall be established in close proximity to the disposal cells. OSLs from this station shall be read quarterly.

2. Confirmatory Sampling - A composite sediment sample shall be taken from the disposal cell within thirty (30) days following each cleaning episode and analyzed dry to confirm that the disposal criteria have not been exceeded.

c. **Chemical Sampling**:

Metals - Once every five (5) years, the accumulated sediment shall be sampled and analyzed for total copper, zinc, and nickel. Other constituents will be analyzed if requested by the state Department of Ecology.

5. **Disposal Site Closure**

Disposal operations are anticipated throughout the operating life of Columbia Generating Station. The disposal site shall be closed in accordance with regulations in effect at the time of closure.

6. **Notifications:**

Information regarding unusual circumstances or testing data that exceeds the specified limits will be reviewed within ten (10) working days with the state.

7. **Reporting:**

a. Routine disposal cell monitoring (4.b above) shall be reported annually in the Radiological Environmental Monitoring Program (REMP) report. The report shall also contain the annual quantity or volume and estimated in-place density of sediment, plus the annual quantity of radionuclides placed in the disposal area.

b. Chemical sampling plans and analytic results shall be provided to the Council after each sampling event.

WASHINGTON STATE
ENERGY FACILITY SITE EVALUATION COUNCIL

RESOLUTION NO. 332 AMENDMENT NO. 1

ENERGY NORTHWEST
COLUMBIA GENERATING STATION

Revisions to the Radiological Environmental Monitoring Program

Nature of Action. In February 2012, the Council closed Resolution No. 260 and approved Resolution No. 332 updating the Radiological Environmental Monitoring Program (REMP) for the Columbia Generating Station (CGS) to clarify its requirements and to better align with the requirements of the Offsite Dose Calculation Manual for CGS. The REMP has as its objective the determination of the significant radiological effects of CGS operations on the environment.

This Amendment No. 1 to Resolution No. 332 changes the type of dosimeter to be used for full-time monitoring of direct radiation from a thermoluminescent dosimeter to an Optically Stimulated Luminescence (OSL) dosimeter. In addition, three (3) shallow groundwater monitoring wells (MW), MW-6, MW-7, and MW-8 as listed in Attachment 1, Table 1 are dry and are no longer sampled.

Background. In July 2022, Energy Northwest notified EFSEC that it had changed the type of dosimeters used for the full-time monitoring of direct radiation from thermoluminescent dosimeters to Optically Stimulated Luminescence (OSL) dosimeters. Although the dosimeters function differently – thermoluminescent dosimeter relies on heat and the optically stimulated luminescence dosimeter relies on optical stimulation – the accuracy and quality of the dosimeters remain the same. The new OSL meets the requirements of the American National Standards Institute (ANSI) Performance, Testing, Procedural Specifications for Thermoluminescence Dosimetry Environmental Applications (ANSI N545: 75(R1993) and the Nuclear Regulatory Commission (NRC) Regulatory thermoluminescent dosimeter specifications in NRC Guide 4.13 and will not affect the quality of the monitoring under the REMP.

Council staff has recommended that Attachment 1 to Resolution No. 332 be amended to reflect the change in the type of dosimeter to be used for full-time monitoring of direct radiation from thermoluminescent dosimeters to Optically Stimulated Luminescence (OSL) dosimeters.

Resolution. The Council hereby amends Resolution No. 332 and its Attachment 1 to require full-time monitoring of direct radiation by Optically Stimulated Luminescence dosimeters as specified in Attachment 1 to this amendment. In addition, the Council hereby amends Resolution No. 332 Attachment 1, Table 1 groundwater monitoring wells.

Dated and effective this 15th day of March 2023.

Washington State Energy Facility Site Evaluation Council

By: _____

Sonia Bumpus, EFSEC Executive Director

Attachment 1: Radiological Environmental Monitoring Program

ATTACHMENT 1

COLUMBIA GENERATING STATION SITE CERTIFICATION AGREEMENT

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

I. GENERAL DESCRIPTION

The Radiological Environmental Monitoring Program (REMP) established by Energy Northwest has as its objective the determination of the significant radiological effects of Columbia Generating Station (CGS) operation on the environment. The monitored items include land, adjacent waters and their aquatic life, air, and other ecosystems, as appropriate. The program provides an environmental measurement history for evaluation by Energy Northwest and the Council. The program uses reasonable and available methods and techniques; it will be maintained throughout the life of CGS or until such time that the Council concurs in its termination.

The Radiological Environmental Monitoring Program may be modified with concurrence of the Council as detailed information acquired from the program indicates a need to change. Any modifications will be based upon: (a) CGS effects, if any, on the terrestrial and aquatic ecology including the wildlife, fish and other aquatic life in the area of influence, (b) siting of other nuclear or other facilities in areas surrounding the site, (c) technological developments in the field of environmental monitoring, (d) changes in types and abundance of the various samples and (e) changes relative to the pathways resulting in human radiation exposure. The program is designed to provide the data needed to evaluate the radiological impact CGS operation may have on the environment, establish a relationship between quantities of radioactive material released by CGS effluents and resultant radiation and radioactivity identified in the environment, and to verify that CGS is operating within its design and regulatory specifications. The monitoring program is also designed to assure appropriate reaction when an unexpected variance occurs in the data results.

This Radiological Environmental Monitoring Program is part of a single integrated program for monitoring the preoperational and operation phases of CGS operations. Changes, supplements, or revisions to the Radiological Environmental Monitoring Program will be submitted to the Council for its review and concurrence.

Energy Northwest is also required to have a Radiological Environmental Monitoring Program by 10 CFR 50. This program is described in the CGS Offsite Dose Calculation Manual (ODCM).

II. MONITORING PROGRAM

A. Program Elements

1. Factors such as distance, prevailing wind direction, and dispersion and deposition values calculated from models are considered when determining sampling locations that have the most potential of showing impact from CGS operation. Other factors such as population density and land usage are also considered. Sample analysis results are to be trended and compared to operational and preoperational data as well as results from control locations in order to assert and quantify the impact CGS operation may have on the environment.

2. Air sampling stations are located in close proximity to CGS, in agriculture areas potentially impacted by CGS operation, near regions with higher population density, and at locations where the infrastructure supports operation of continuous air sampling equipment. The zone within ten miles of CGS is emphasized, with consideration given to areas in downwind sectors where populations are more concentrated or agriculture impact more likely. The ten-mile radius zone includes parts of Franklin and Benton Counties.

3. In the terrestrial monitoring part of this program (milk, soil and farm products), the area within a ten-mile radius of CGS is of primary concern. Agriculture is the primary activity in the Franklin County portion of this area. The major crops are wheat, corn, alfalfa hay, potatoes, grapes, apples and soft fruits. Farm produce is sampled as it is available and from location where CGS operation may potentially have the greatest impact.

   Particular emphasis is placed on the collection of the primary components of the food chain to man. Fresh vegetables, fruits, milk, and other food stuffs that are directly consumed by man are emphasized. Samples of domestic animals normally consumed by man, such as chickens, beef cattle, and hogs will be collected if air, soil, or vegetation results from the area indicate a measureable impact due to CGS operation and samples are available.

   Soil samples are collected from locations near CGS and in Franklin County.

4. In the aquatic program, sampling includes deep groundwater at CGS, shallow ground water collected from wells around CGS, water draining to the storm drain pond NE of the CGS site, surface water samples from the Columbia River, and drinking water from the City of Richland municipal water supply.

In addition, sediment samples are taken from the Columbia River above and below the CGS discharge point. Fish samples are taken from the Columbia River near the plant discharge and from a control location not expected to be influenced by CGS operation.

B. Surveillance Levels

1. The radiological environmental monitoring program sampling schedule outlined in Table 1 represents the current level of surveillance around CGS. The sampling locations may change from time to time if samples are no longer available. Replacement sampling sites are then added to the program to compensate. REMP sampling locations relative to CGS are listed in Table 1, most of the locations are also shown graphically in Figure 1.

2. Analytical procedures shall be compatible with but not limited to the following documents, or later documents representing state-of-the-art improvements:

   "Handbook of Radiochemical Analytical Methods" U.S. Environmental Protection Agency, EPA-680/4-75-001, February, 1975.

   "Health and Safety Laboratory Procedures Manual" U.S. Energy Research and Development Administration, HASL-300 27th Edition.

   "Standard Methods for the Examination of Water" American Public Health Association, 20th Edition.

3. Samples are to be analyzed in a manner to achieve the a priori lower level of detection (LLD) limits listed in CGS ODCM Table 6.3.1-3. Environmental water samples analyzed for tritium are analyzed to a LLD of 300 pCi/l or lower. Samples are to be analyzed in a timely manner to ensure required LLDs will be achieved and prompt and appropriate action can be taken if an impact is identified.

4. Sample analysis will be performed by laboratories which maintain a quality assurance program that meets the requirements of NRC regulatory guide 4.15 and that participate in an accredited laboratory intercomparison study traceable to the National Institute of Standards and Technology (NIST). Upon request, Energy Northwest will provide the Council or its designated representative’s access to written procedures, quality assurance audits, and the results of the laboratory intercomparison studies as performed in the implementation of the Radiological Environmental Monitoring Program. In addition, the Council designate(s) will be provided the opportunity to accompany and observe the collection and analytical process.

C. Sample Types and Media - General Discussion

1. Background Radiation

Background radiation levels are determined by exposing Optically Stimulated Luminescence (OSLs) dosimeters at twenty-five or more locations within a ten-mile radius of the site. The OSLs are exchanged and read quarterly. The type of OSLs used is designed for environmental monitoring. Measurement of background exposure rates are made in units of milli-Roentgen (mR) and reported in units of mR/day and/or mR/quarter. Results from each location are compared to results from a control location and also compared to historic results in order to determine what direct radiation effects CGS operation may be having on the surrounding area. Additionally, the REMP also performs OSL monitoring of the CGS Independent Spent Fuel Storage Installation (ISFSI).

2. Airborne Particulates and Iodine

Sampling for airborne radio-particulates and radio-iodine is performed on a weekly basis from nine or more sampling locations including a control location. Samples are collected weekly. The filter housings are located 5-6 feet above ground level in order to obtain the sample from the breathing zone, help reduce dust loading, and minimizes the impact of radon and radon daughters on the sample results. Iodine cartridges are typically analyzed within 2 days of collection for radio-iodine. Air particulate filters are decayed for a set time period (GT 24 hours, typically 6 days) before performing gross beta analysis. The same decay period is used consistently to reduce variability when trending results. Particulate gross beta results are subject to weekly and seasonal variability due to weather and environmental fluctuations.

3. Drinking Water

Samples of drinking water are collected on a monthly basis from at least one location downstream of the CGS Columbia river discharge location. The primary sample location is the City of Richland treatment facility which is the closest public drinking water collection facility located downstream of the CGS discharge point. A representative composite sample is collected using equipment which is capable of collecting aliquots on a flow proportional or timed interval basis.

4. River and Discharge Water

Samples of Columbia River water are collected on a monthly basis from locations upstream and downstream of the plant discharge point. The upstream sample is taken from the CGS intake water system (tower makeup). The downstream sample requirement is conservatively met by taking a sample from the cooling tower discharge line just prior to final discharge into the Columbia River. A representative composite sample is collected using equipment which is capable of collecting aliquots on a flow proportional or timed interval basis.

5. Storm Drain Water

Samples of water flowing into the CGS storm drain pond are collected monthly. A representative composite sample is collected using equipment which is capable of collecting aliquots on a flow proportional or timed interval basis.

6. Ground Water

Sampling of groundwater is performed quarterly from at least one deep well used for fire protection and/or as a backup drinking water source. Sampling is also performed from at least 2 shallow wells used to monitor the unconfined aquifer under CGS. Note: Tritium is known to exist in the unconfined aquifer under CGS as the results of past Department of Energy activities on the Hanford site. Sampling from the unconfined aquifer is performed to assess any contribution CGS may be making to the known ground water contamination issue.

7. Sanitary Waste Water

All sanitary waste water sampling and analysis requirements relating to the Energy Northwest Sanitary Waste Treatment Facility are listed in a separate EFSEC Resolution and not included as part of this resolution.

8. Soil and Sediments

Soil samples are collected annually from air sampling locations near CGS and from locations in Franklin County. Columbia River sediment is collected at least annually upstream and downstream from the CGS discharge point. Samples are analyzed for gamma emitters and if required for Sr-89/90. Sample results are compared to results from control locations, historic results, and levels known to exist in local soils. Sample and analysis requirements for cooling tower sediments is given in a separate EFSEC resolution and not included as part of this resolution.

9. Milk

Milk is sampled semimonthly during periods when milking animals are on pasture and monthly at other times. Samples are obtained from at least one milk producer located within ten miles of CGS, if available. Milk from a control location greater than 20 miles from CGS and in a sector least likely to be influenced by CGS operation is also collected on a monthly basis. Information regarding the source of feed should be documented for each sampling location if possible. If no milk producers within 10 miles are available, samples of broadleaf vegetation may be sampled monthly during the growing season in lieu of milk sampling.

10. Fish

Fish are collected annually from the Columbia River near the plant discharge and from a control location not influenced by plant discharge, usually the Snake River. The same species are collected from both the indicator and control locations, if possible. The exact time of sampling depends upon such factors as the water depth, weather conditions, and fish availability.

11. Fruits, Vegetables, and Vegetation

Fruits and vegetables grown for human consumption are collected from areas that potentially could be affected by CGS operations. Both the gaseous and liquid pathways are considered. When possible, fruit and vegetable samples are collected from locations in a predominant downwind location that are irrigated with Columbia River water withdrawn downstream of the plant discharge location.

For locations where the predominate pathway is gaseous, leafy vegetables or vegetation is the preferred sample media. For locations where the predominate pathway is liquid, root crops are the preferred sample media. Analysis is performed on edible portions only. Samples from control locations are obtained annually for comparison.

D. Sampling and Notification Requirements

1. Split Sampling

   The CGS REMP will provide split samples of routinely collected samples to the Washington State Department of Health (WDOH) for independent verification of sampling results. A split sample schedule is to be agreed to by both parties at the beginning of each year.

2. Changes to the CGS ODCM

   Notification of any changes to the ODCM that effect CGS REMP sampling and analysis are to be communicated to WDOH and/or EFSEC.

3. Notification of Sampling Deviations, Abnormal Results

   CGS will inform WDOH and/or EFSEC of any sampling deviations, abnormal results, or trends that may show impact to the environment due to CGS operation. Any condition reports written on REMP related issues should be communicated to WDOH and/or EFSEC.

4. Reporting of Results

   Results of all Resolution required sampling is to be reported in the CGS annual radiological environmental operating report (AREOR). The report will be made available to WDOH and EFSEC. Sampling results not included in the annual report may be provided to WDOH and/or EFSEC if requested.

5. Sampling Requirements

   Samples shall be collected and analyzed as outlined in Table 1. Deviations are permitted from the Table 1 sampling schedule if samples are unobtainable due to hazardous conditions, seasonal availability, malfunction of automatic sampling equipment, or other legitimate reasons. Significant sample deviations (i.e., sample not obtained, ODCM LLD not achieved) will be documented in the annual report. If samples are unobtainable due to sampling equipment malfunction, efforts shall be made to complete corrective action prior to the end of the next sampling period. If extended sampling failures occur (two sampling periods), arrangements shall be made to obtain adequate alternate samples.

Table 1
Sampling Requirements

All locations are identified relative to their distance and direction from CGS containment.

Sample Type	Location and Station ID	Sampling and Collection Frequency	Required Analyses
Airborne Particulate and Radioiodine	1.3 miles S (ST-1) 3.0 miles ESE (ST-23) 4.6 miles NE (ST-48) 9.6 miles SSE (ST-4) 6.5 miles SE (ST-40) 7.7 miles S (ST-6) 2.8 miles WNW (ST-7) 4.4 miles ESE (ST-8) 28 miles WSW (ST-9)	Continuous Sampling Weekly Collection	Radioiodine analysis (I-131) Weekly Particulate Gross Beta analysis weekly Particulate gamma isotopic of quarterly composite (by location)
Particulate filters are analyzed for gross beta following a 24 hour or longer decay period. If gross beta results are significantly greater than the results from the control location and/or the results indicate an impact that could reasonably be attributed to CGS operation, gamma isotopic analysis is performed on the individual air filters.			
Direct Radiation Environmental	9.6 miles SSE (ST-4) 6.5 miles SE (ST-40) 7.7 miles S (ST-6) 2.8 miles WNW (ST-7) 4.4 miles ESE (ST-8) 28 miles WSW (ST-9) 3.2 miles E (ST-10) 3.2 miles ENE (ST-11) 6.7 miles NNW (ST-12) At least 1 OSL within each 22 1/2° sector around CGS located between 0.9 and 2.2 miles of CGS.	Continuous Exposure Quarterly Collection	Exposure Rate (milliroentgen/period)
Direct Radiation ISFSI	4 or more OSLs located on ISFSI security fence line.	Continuous Exposure Quarterly Collection	Exposure Rate (milliroentgen/period)
Optically Stimulated Luminescence (OSL) dosimeters containing multiple sensors will be used. Sensor results from each OSLs should be compared for anomalies. Direct radiation monitoring at ISFSI is to be performed during periods when spent fuel is stored at that facility.			

Table 1
Sampling Requirements

Sample Type	Location and Station ID	Sampling and Collection Frequency	Required Analyses
Soil	Two samples from locations near CGS historically sampled, two samples from locations in Franklin County, one sample from control location.	Annual Grab Sample	Gamma Isotopic Sr-90 as needed (see note)
Locations near CGS historically sampled include air sample stations 1, 21, 7, and 23. Samples should be alternated so that these locations are sampled bi-annually. Samples from Franklin County should be from agricultural areas that may be impacted by CGS operation. Control is ST-9, 28 miles WSW of CGS. Individual soil samples will be analyzed for strontium-90 if gamma results indicate the presence of radionuclides attributable to CGS operation at levels that are greater than 5 times the historic trend and greater than 5 times the analysis LLD.			
River Intake, Plant Discharge, Storm Drain, and Drinking Water	3.2 miles E (ST-26) 3.2 miles E (ST-27) 0.22 miles ENE (ST-101B) 11.6 miles SSE (ST-29)	Composite Aliquots Monthly Collection	Gamma Isotopic, Gross Beta, and Tritium on all samples. Sr-90 on drinking water as needed (see note)
A representative sample will be collected using automatic composite sampling equipment that collects samples on a flow proportional or a set timed interval. When timed interval sampling is used, the sample collection frequency is short (e.g., hourly) relative to the compositing period (e.g., monthly). Flow proportional sampling is preferred. If the gross beta activity in a drinking water sample is greater than 8 pCi/l, strontium-90 analysis will be performed. This requirement does not pertain to river intake, storm drain, or plant discharge water.			
Ground Water	0.1 miles N(ST-52) From two shallow groundwater well locations.	Quarterly Grab Samples	Gamma Isotopic and Tritium.
Shallow groundwater sampling locations include MW-3,5, 9,10,11,12,13,14.			
River Sediment	~2.0 miles upstream (St-33) ~1.0 miles downstream (ST-34)	Annual Grab sample	Gamma Isotopic
Sample should consist of shoreline sediment and not deep water sediment. Samples should be taken from areas known to be underwater during high water periods and were the potential for river silt or sediment accumulation is likely.			

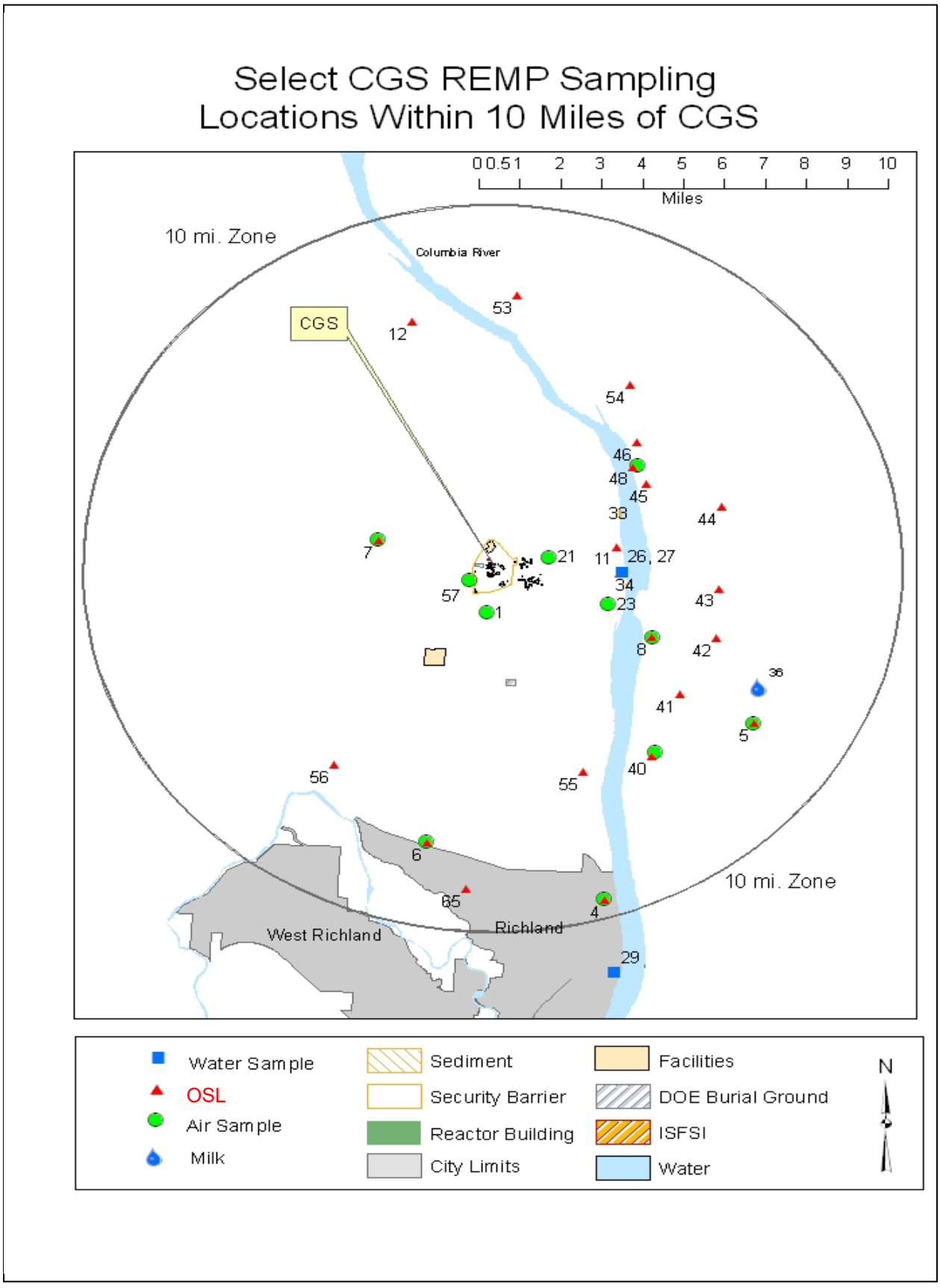
Table 1
Sampling Requirements

Sample Type	Location and Station ID	Sampling and Collection Frequency	Required Analyses
Milk	Milk from at least 1 Dairy within 10 miles of CGS. (see note) Milk control from Dairy > 20 miles from CGS and in sector not likely to be affected by CGS operation.	Semi monthly when milk animals are on pasture, monthly at other times.	Gamma Isotopic and I-131 analysis on all samples collected. Sr-90 if Cs-134/137 identified in excess of 30 pCi/l
Samples are obtained from at least one milk producer located within ten miles of CGS, if available. If more than one producer is available, collection from more than one location should be made. If multiple locations (GT 2) are available, the 2 locations with the highest dose potential should be sampled. If no milk producers within 10 miles are available, samples of broadleaf vegetation or feed grown near 2 offsite locations with higher predicted ground level D/Q values may be sampled monthly during the growing season in lieu of milk sampling.			
Fruits and Vegetables	Samples of fruits and vegetables grown for human consumption from locations using Columbia River water obtained downstream of CGS discharge or from locations potentially impacted by CGS gaseous emissions (ST-37). Samples of fruits and vegetables from control locations	During growing season, at time of availability. Annual control collection	Gamma Isotopic on edible portions.
Samples should be obtained from farms or gardens in close proximity to CGS. Sample of root crops, leafy vegetables, and fruits should be collected as they are in season; different varieties should be obtained. For locations where the predominate pathway is gaseous, leafy vegetables are the preferred sample media. For locations where the predominate pathway is liquid, root crops are the preferred sample media. Vegetation samples taken from locations within 2 miles of CGS may be taken in place of leafy vegetables. One control root crop, leafy vegetable, and fruit sample should be collected each year.			

Table 1
Sampling Requirements

Sample Type	Location and Station ID	Sampling and Collection Frequency	Required Analyses
Fish	One sample from 3 species (one anadromous and two resident) in the vicinity of the plant discharge area (ST-30). One sample from the same or similar species from areas not influenced by plant discharge.	Annually, unless an impact is indicated, then semiannually	Gamma Isotopic on edible portions
If any of the analytical results of the Columbia River fish samples are significantly higher than the results of the control samples or results from previous years, sampling is to be conducted semiannually. Anadromous species may be collected at local hatcheries. Fish species with recreational value should preferentially be collected if available.			
Meat and Poultry	Closest available sample to location of identified impact	As available, when impact identified	Gamma Isotopic on edible portions
Meat and/or poultry are to be sampled when vicinal soil, air, or vegetation samples indicate an impact that may reasonably be attributed to CGC operation or when dose projection model indicate a measureable impact. Sample frequency for meat and poultry shall be as available at time of harvest.			

Table 1
Sampling Requirements



EFSEC Monthly Council Meeting Facility Update

Facility Name: Columbia Solar Projects (Penstemon, Camas and Urtica)
Operator: Tuusso Energy, LLC
Report Date: Mar 3, 2023
Reporting Period: 30 days ending Mar 3, 2023
Site Contact: Thomas Cushing
Facility SCA Status: Construction

Construction Status

- Penstemon
  - Currently operational
  - Total Generation during the month of February was 591.8 megawatt hours

- Camas
  - Currently operational
  - Total Generation during the month of February was 564.1 megawatt hours

- Urtica
  - Substantial completion achieved February 8, 2023
  - Final Completion achieved March 2, 2023
  - Total Generation during the month of February was 627 megawatt hours

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Horse Heaven Wind Project

March 2023 project update

[Place holder]

Goose Prairie Solar Project

March 2023 project update

[Place holder]

Badger Mountain Solar Energy Project

March 2023 project update

[Place holder]

High Top and Ostrea Solar Project

March 2023 project update

[Place holder]

Wautoma Solar

March 2023 project update

[Place holder]

Hop Hill Solar Project

March 2023 project update

[Place holder]

Carriger Solar

March 2023 project update

[Place holder]