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engineering measures, (e.g., hydrologic grout curtains, pond relocations, organic complexant destruction facilities, reduced plant discharges, incineration facilities, etc.)

We are in the business of improving man's understanding of the environment and how his activities might positively or negatively impact local and global habitability. We believe that with improved understanding of the controlling physical, chemical and biological mechanisms, and with improved, quality-controlled data bases, that much of the present conservatism employed by environmental regulatory agencies like EPA and NRC can be significantly reduced. Our experiences in spent oil shale, fossil-fuel wastes, hazardous chemicals, uranium mill tailings, insitu solution mining and acid rain have shown that when faced with a paucity of information, regulators have generally been ultra-conservative. However, when presented with additional, technically-defensible information, they have often reduced or eliminated their requirements for liners, covers, waste treatment or plant shut-downs.

In summary, we will use whatever tools and knowledge we possess to conduct performance assessments (i.e., environmental pathways analyses) for Hanford contractors. However, we will continue to stress the importance of technical defensibility and the need to reduce the level of uncertainty in our predictions, especially if such predictions might impact potentially expensive engineering decisions by Rockwell or other Hanford contractors. They can't afford for us to make too many mistakes.

Sincerely,

James A. Stottlemyre

James A. Stottlemyre, PhD
Associate Manager
Geosciences Research and Engineering Department

JAS:bh

CC: PE Bramson, PNL
DW Dragnich, PNL
PA Eddy, PNL
CE Elderkin, PNL
OJ Elgert, DOE-RL
DR Elle, DOE-RL
CA Geffen, PNL
MJ Graham, PNL
HA Haerer, RHO
JM Latkovitch, PNL
JL McElroy, PNL
JV Robinson, PNL
RA Stokes, PNL