

## RESTORATION ADVISORY BOARD MINUTES

October 29, 2019

The Restoration Advisory Board (RAB) meeting was called to order by Elyn Holton-Dean at 9:02 a.m. on 29 October 2019 at the West Burlington City Hall.

### **Minutes Review**

The July 2019 meeting minutes were accepted as written. There were no public comments.

### **Agenda Review**

The October 2019 agenda was accepted as written. There were no further questions.

### **Environmental Services Update**

Kim-Lee Yarberry of CH2M HILL, now Jacobs, then presented an update on the Environmental Services Contract. Under the CERCLA program the objective of the Remedial Investigation (RI) is to determine the nature and extent of contamination, to update the conceptual site model, and evaluate risk. 35 sites or areas were included in the approved Quality Assurance Project Plans (QAPPs) for OU-6.

Kim-Lee stated that for the RI we have started data analysis for data collected. We also prepared an interim deliverable for Human Health Risk Assessment (HHRA) for Line 2 and it was submitted to the Army for review.

Currently we are working on an Ecological Risk Assessment interim deliverable with a focus on receptors (plants and animals that are potentially exposed). We also prepared and submitted two background concentration documents for use in the RI. The Groundwater tech memo is with the Environmental Protection Agency (EPA) and we are addressing their comments. The Surface Water/Sediment (SW/SED) tech memo is with Army under their review.

Kim-Lee then showed the pending RI fieldwork slide and the remaining work includes:

- Additional groundwater sampling at Line 3A, Line 3A Pond, and Line 9.
- Overburden and bedrock well installation and sampling at various sites:
  - Demolition Area/Deactivation Furnace (DA/DF)
  - North Burn Pad
  - West Burn Pad
  - East Burn Pad
  - Contaminated Clothing Laundry (CCL)
- Well re-development and re-survey at various sites
- Temporary well abandonment at Line 3A
- Ground Penetrating Radar (GPR) survey is to assess ash at Deactivation Furnace (DF) site
- Operable Unit (OU) 3 data gap investigation at off-site residents

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Kim-Lee showed an updated map with stars showing completed sites and mentioned that some of this work was on hold pending funding, while other work was delayed due to access issues with off-site landowners (OU-3). The map with green stars show sites that have been completed, pink stars show sites that are partially completed, and the yellow stars are for the sites we haven't started yet.

Vaughn Moore asked about the inspection at Line 2, did we consider the pilot plant? They did special ops "black projects". In the backside we found saturated ground with TNT in the soil. He also asked about the old acid pond at Line 3A. Kim-Lee said that is one of the sites that we are still investigating.

Jen Busard said there was a previous soil remedial action for Line 2. Vaughn indicated the pilot plant was down by the second melt. Randy Doyle said his crew is also doing a lot of work at Building 501. Steve Bellrichard added that 1-85-2 was around the time of desert storm, and it was the last building built at Line 1. Demilitarization (Demil) was being worked on in 2004 when he first started at the Iowa Army Ammunition Plant (IAAAP) and that by 2005 or 2006 Demil was completed.

Kim-Lee then discussed some other pending future work. A Site Investigation (SI) is planned for emerging contaminants called perfluoroalkyl substances (PFAS) for the Fire Department, Fire Training Pit, and trenches at OU-4. A Preliminary Assessment (PA) is used to identify sites where it could possibly have been used or released, and the SI would look at the presence and absence of these compounds. The plan is to get started on an SI work plan since it was recently funded, but we are waiting for the PA conclusions.

Julie Solinski asked a question about what PFAS is? Danny O'Connor answered it is a group of 5,000 chemicals used in various products such as Teflon, cookware, and fire-fighting foams. Dan Cook brought up that some fire departments are still using it for budget reasons.

Julie asked why we are concerned about it? Kim-Lee responded that toxicity tests are still being conducted but there is a concern that it is harmful to humans at certain concentration levels. More research and guidance are underway, but the Army is trying to get ahead of the problem.

Danny brought up there are different classes of foams. The Air Force and Navy use "A triple F" (AFFF) and there is a health advisory for two of the compounds (PFOA and PFOS) at 70 parts per trillion (ppt). We currently do not have a Maximum Contaminant Level (MCL) like we do for lead, so it isn't enforceable. There are two Air Force bases and two National Guard bases in Iowa that have a problem.

Bruce Workman asked if PFAS sampling was for soil and groundwater? Kim-Lee said both. Randy added that no PFAS was detected at the treatment plant.

Kim-Lee pointed out that the investigation at the Incendiary Disposal Area (InDA) site is still lagging others in the RI program due to access issues. Jen added that there is a temporary crossing that has been put in until bridge construction begins in 2020.

Kim-Lee shared an update on the Mathes Lake SI. She first summarized the SI process,

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which included reviewing the PA, preparing the UFP-QAPP work plan, and reviewing depleted uranium data (DU) upstream of Mathes Lake and provided for by the Formerly Utilized Sites Remedial Action Program (FUSRAP). Kim-Lee then reminded the group of the SI field activities which included surface water and sediment samples at 10 co-located stations, and she showed a map of where these were collected. The Draft SI report was submitted to EPA in July and the Army is currently responding to comments. While no conclusions or recommendations can be made yet since the document isn't finalized, the results can be shared:

- Surface Water
  - No detections of explosives, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), pesticides, or hexavalent chromium
  - Low-level detections of metals; however, concentrations did not exceed respective human health and ecological Project Action Limits (PALs)
- Sediment
  - No detections of SVOCs, PCBs, or pesticides
  - Low-level detections of VOCs, explosives, and metals
    - No concentrations exceeded human health PALs
    - Methyl ethyl ketone (MEK) and arsenic slightly exceeded their ecological PALs, but were not identified as a chemical of interest for Mathes Lake
- Based on the results of the SI, no contamination was identified for surface water or sediment in Mathes Lake

Again, conclusions and recommendations could not be made yet since the SI report has not been finalized.

Vaughn doesn't understand how we didn't find any levels at Mathes Lake that exceeded human health concerns. In 1971, they were told not to drink the water in Mathes Lake, because it was contaminated, but didn't say what it was contaminated with at the time. In 1978, the Plant switched over to Burlington City Water.

Danny said that his understanding of the switch to drinking water was silt issues. Steve's understanding is that it was cheaper to buy water than to make it themselves. Aaron Steele said we can check the PA to see what the rationale was for switching to drinking water. A review of possible sources to Mathes Lake was evaluated in the PA.

Hans Trousil asked if any of the samples were collected near the shoreline. Kim-Lee answered samples were taken near the boat launch. The focus of the SI was on places where creeks entered the lake. Jeff Morrison added that it wasn't an unbiased sampling grid – sample locations were selected on purpose. The rationale was the two main tributaries, Long creek and the other tributary. Co-located samples of surface water and

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sediment together.

Linda Latta clarified that no DU was analyzed, Kim-Lee said not in the SI. Jen referred to another map that showed where previous samples had been collected by FUSRAP. There had been previous investigations, but that data was quite old, so the SI was conducted. There were no further questions.

### **Technical Assistance for Public Participation (TAPP)**

Cathy Kropp of Army Environmental Command (AEC), then introduced herself. Before discussing the TAPP program, she wanted to address some of the questions and issues raised during the PFAS discussion. The Army is addressing PFAS on an agency-wide basis. The EPA lowered the drinking water level in 2015 for drinking water and introduced Health Advisory Levels (HALs).

PFAS and PFOA have had the most studies. There are thousands of these chemicals. Teflon pans that are coated, wrapping on hamburgers at McDonalds had PFAS. AFFF is the one product with the most problems because the firefighters used them. It was also used in ships and airplane fires which is why the Air Force and Navy had more problems, but the Army used it too.

Every Army installation was tested for PFAS. 13 out of 1000s of Army bases tested came back positive. Some were given a treatment system, some were given bottled water, some had water blended, etc. at the 13 different bases with a problem. Army looked at sources to see where it came from in a PA that is going on at every Army installation. It was also used in chrome operations like lating.

PA for IAAAP will give the likelihood of use and storage of PFAS. They interviewed current and former fire chiefs. Areas of potential interest will be targeted in the SI. There will be special sampling protocols when analyzing for PFAS, such as in the gloves, Tyvek, and some pumps that can't be used because they have Teflon coating or Teflon tape.

Steve thanked Cathy for coming today and provided some background. He said the Army knew the community was interested in the results of Mathes Lake. The TAPP program is a resource offered to the RAB to help understand the remedial process.

Cathy then introduced the purpose of TAPP. Scientists and engineers don't always communicate in terms that the public can understand in the reports, results, or rationale, etc. TAPP is a Department of Defense (DoD) program that allows Army to fund an independent technical consultation to assist the RAB. It is subject to the availability of funds, which at the beginning of a Fiscal Year (FY) there are no funds just yet. When funded, you can get up to \$25k per year.

Only the RAB can apply for funding. The Army's responsibility is to provide information. Some RABs bring in United States Geological Survey (USGS) or a local university to better explain the information. This is different than a typical third party review that Army often uses (e.g. with USGS). The RAB would have a contract and USGS would be working for them on a specific task.

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Steve said there is some history of using TAPP at IAAAP. Cathy said it has been used in the Army a lot. Especially with RI results and particularly in risk assessments. TAPP use must be site specific, and something that isn't already available with EPA or others. She then summarized the application process and use of DD Form 2749. The RAB co-chair is involved in this step and it needs a single point of contact.

The RAB would need a Scope of Work (SOW) and it must be approved by the Defense Environmental Restoration Program (DERP) manager. If the application is disapproved, there is an appeals process. Often times the independent party just focuses on one area (since an RI usually has so many things going on). Cathy then summarized TAPP and asked if there were any questions.

Hans asked is this specific to just one task. Cathy said yes, one project or task such as Mathes Lake. She said they often use USGS on groundwater projects because they are groundwater experts. Sometimes they use Oak Ridge laboratory to assess data that the Army has collected. Steve said that the last time they used the TAPP program they hired the University of Iowa. Cathy said that it needs to be a trusted organization and is independent from the Army. It is the RAB's choice of who to hire for assistance.

Hans asked how long it takes to get approved. Kathy said it depends on what agreements they have in place. Vaughn added that sometimes we don't understand, what are the "within the limitations" and what does that mean? Cathy used a blood test analogy about a range of results, not just a number.

Vaughn said it is hard to understand law if you aren't a lawyer. Cathy said it is important when you get to a Decision Document after the Remedial Investigation/Feasibility Study (RI/FS) that you need to make sure everyone understands the decision, the results, etc. TAPP can help with that.

LTC Eric Schilling asked about the outside third party, what if they come back and say we don't think you sampled in the right places? Cathy responded that they would need to provide a scientific rationale of why more samples are needed. It would still be an Army decision about whether to do additional sampling. It is up to decision makers, but if nothing else there will be a rationale for getting more funding. Work is using tax payer dollars so it needs justification and a scientific basis.

Bruce asked what the next step is and are people prepared to make a decision on this now? Jen said we could wait until the January RAB meeting or we can discuss via email. Julie asked if they could meet in interim. Cathy added that one RAB member usually takes the lead on the TAPP process.

Bruce asked a question about the spikes in Brush Creek of RDX in rain events, stating that it is one unanswered question that hasn't been addressed. Steve said that 5 or 10 years ago we were running at about 9 parts per billion (ppb) on average and one sampling event it jumped up to 100 ppb and then went back down. They couldn't explain it. Cathy replied you might not need a TAPP to answer that question. Steve said he doesn't want to oversell TAPP, but he heard Vaughn say "I don't understand." Hans said he thinks it is worth pursuing. Hans thinks it would be great to start with a new project like the Iron Bioreactors task. Cathy added that you do need to give Army a

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chance to explain it first. Steve said that specialized researchers are conducting that study.

LTC Eric Schilling clarified whether the issue is are the results expected, or are the results not understood? Mathes Lake was alleged to be contaminated back in the 1970s, but since that time there may have been some dissolution of the materials? Cathy replied that the TAPP wouldn't perform more sampling, it would review what has already been done and then better explain the rationale and the results.

LTC Eric Schilling asked if Mathes Lake was contaminated in the 1970s but isn't now, is that a TAPP question? Cathy clarified the TAPP would go re-sample, but it would be to evaluate the PA and rationale behind decisions that had been made. Was there scientific basis?

Steve summarized the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) process for Mathes Lake. Was there a reason to investigate in the PA? Answer is yes. In the SI, is there contamination present? Answer is no, so there is no need to go the next step of a RI.

LTC Eric Schilling said that makes more sense to him. A validation of the decision and data is better. "You don't understand" sounds condescending to him. Cathy admitted that the Army doesn't always do a great job of explaining rationale.

TAPP is limited to \$25K per year so it depends on the cost of your experts on how many tasks you can fund. Jen said that USGS is reviewing the RI documents (AEC has a contract with them already). There were no further questions.

### **Building Demolition Status**

Randy Doyle provided an update on Building Demo. They are currently at Line 3. All phases of the program are funded. Good things are happening at IAAAP, with lots of construction, modernization, and expansion. 308 structures have come down during the demo of old facilities and approximately 540,000 square feet.

We are nearing 100,000 tons of concrete crushed to date. Reusing it almost as fast as we are making it. The crusher unit from the contractor is brand new. Using rock around the facility for gravel roads and fine sand is also being reused.

We are pretty much complete with asbestos abatement plant-wide, and not encountering much PCBs any more either. Lead ballast is one regulated material they are still dealing with. Randy then showed a number of slides with before and after photos.

He added that Jen is working on some compliance cleanup issues with EPA at Line 6. Line 5 is mainly inert so people who don't need to be involved in energetics will be moved there. Functions that don't need to be in the arc will be moved (laundry, etc.)

Line 1 photos are the most exciting ones because it has very deep (23-30 ft) sumps.

An "Aha" moment was when we found that there was another floor at Building 1-40 where the piping went. We modified the contract, got asbestos abated, it was explosive contaminated so we needed an unexploded ordnance (UXO) contractor, etc. It is

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projected that it will take 70,000 cubic yards of soil to fill up the hole up at Building 1-40. We are going to take the soil that was excavated and mounded to the south and put the original soil back in. Vaughn said now we know what the “pipe chase” is.

Randy showed more progress pictures. We are now 50% complete on the melt pour that is being taking down. It took about a month to get all the equipment out that was explosives contaminated. We are trying to get away from open burn/open detonate (OB/OD) technology, we would rather be using an innovative technology to mitigate the contamination without emissions.

Randy provided a project update in regards to recycling:

- Over 61,000 ton of concrete crushed for re-use
- Over 2,500 ton of metal recycled
- Realizing a 85% diversion rate of solid waste (concrete, recyclable items)

With regards to environmental stewardship:

- 2,000 ton of asbestos abated
- 40 ton PCB contaminated debris abated
- Proper disposal of other regulated material (lead, ballasts, Hazardous Material)

Vaughn asked about open and closed burning of propellants? Randy replied that OB/OD will not go away based on congressional study for Army. My team will be proactive and bring in a vendor on an as needed basis, we want to outsource this. We do have two pans that can be used, but there is a strict compliance schedule. Propellants that are out of spec still need to be destroyed. We have a new hazardous waste permit under RCRA that allows for open burn. Some energetics are just not safe to move.

Julie asked about Building 1-40 demo and did it include the sump? Randy answered the southwest corner sump is still active and it is about 30 ft deep. Julie said there were some past questions about CERCLA sampling when these buildings come down. Mike Kessler is sampling with FUSRAP who is sampling under the Line 1 buildings. Jen is working on a contract for CERCLA sampling under the other buildings. Julie commented it has been years to get that contract in place. Randy said that it is up to AEC to fund this.

Danny asked Jen about the status of the contract for sampling under the buildings? Jen has the contracting paperwork, but it is on hold until we are further along with demo and buildings are down.

Julie said she doesn't understand the two answers from Jen and Randy and it seemed contradictory. Julie said it isn't clear to her what to sample for under the buildings. Jen has a list of 16 buildings that will need to be sampled in CERCLA. Randy's team is doing the Environmental Contamination Assessment.

LTC Eric Schilling asked if it is more about the approach--sample as you go, or after you

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are done? Jen said that the CERCLA process is essentially at the same place after a year and half. Julie would like to see a status for each building.

### FUSRAP Update

Mike Kessler provided an update on FUSRAP activities. He reminded the group what the acronym FUSRAP stands for: Formerly Utilized Sites Remedial Action Program to deal with former atomic energy commission radioactive waste. It was assigned to the Department of Energy (DOE) and then it was transferred to the United States Army Corp of Engineers (USACE). Two OUs were assigned: OU-1 primarily explosives contaminated soils in Line 1 and West Burn Pads (WBP), while OU8 is predominantly looking for low level radiation. For OU-8, there are 7 sites in the FUSRAP Record of Decision (ROD): Line 1 structures, West Burn Pad (South), Firing Sites Area, Yard C, Yard G, Yard L, and Warehouse 3-01.

Mike first showed a radiological slide from 2013 showing red dots of a flyover survey on his computer to the RAB members. Vaughn said it showed nothing in the Firing Sites Area, just coal piles, this was told by Roger Allison at a RAB meeting. Mike then introduced Captain Nick Copeland who is with the construction branch.

West Burn Pad South (WBPS) of the Road Remedial Action Completion Report (RACR) is currently in review by stakeholders. WBPS remediation was completed in 2010, but they had to wait for Building 1-70, 1-05-1 and 1-05-2 (the two melt buildings), to come down to sample underneath those structures. They did not find the entire floor contaminated, but some of the corners were and some remediation needed to be done. Additional sampling is planned for Building 1-155-1 and 1-40.

Linda has a question on Line 1. As a standard practice, when you demo a building do you take out piping? Who is responsible for removing the pipeline and sampling along pipeline? Mike said that is a good question and he would have to get back to her. The goal for FUSRAP for FY20 is to begin remediation at Line 1. We don't have a contract for remediation yet (just sampling).

For OU-8, the FUSRAP operable unit, they did find contamination in two Line 1 structures and those were remediated. For the last several years the main focus has been on the Firing Sites. Our third party contractor, Leidos, comes in and does verification walkover as a gamma survey. Every 40 tons of soil that goes through the processor gets sampled and analyzed. Hydraseeding will be completed this week. Mike then presented slides that depicted quarterly activities that are completed and planned:

Q4 2019 activities completed:

- **OU-1:**
  - Draft of WBPS RACR. REV B in regulator review.



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- **OU-8:**
  - CY 2018 EMDAR
  - PDI of SUs to confirm boundary of Extended GEA
  - Verification of areas excavated in 2018

Q1 2020 activities planned:

- **OU-1:**
  - Conclude development of sampling plan for 'bounding' contamination at additional Line 1 buildings. Collect additional soil samples if possible.
  - Complete review of WBPS RACR and finalize.
- **OU-8:**
  - Complete excavation and processing of soils in Area H.
  - Complete verification of areas excavated in 2019.
  - Restore Areas G and H.
  - Complete verification of Northern SUs that have been hand remediated.
  - 2019 T&D campaign and temporary site demobilization for the winter (will happen in between Thanksgiving and Christmas)

Mike then presented the results of the 2018 EMDAR (Environmental Monitoring Data and Analysis Report) that was published on August 7, 2019. The map indicates the locations that are sampled. They collected samples upstream from Mathes Lake (three on the north branch and three on the combined tributary). No adverse impacts were observed from the remedial activities at Firing Site 12 (FS-12).

Mike then shared that FUSRAP met their 2019 goals and he presented a slide with 2020 goals:

- Ship 1,000 CY of >RG material
- Process 11,400 CY of material
- Stockpile 750 CY for future shipping
- 'Release' 30 Survey Units
- Complete OU-1 WBPS RACR
- Complete OU-8 Line 1 Structures RACR
- Complete OU-8 Firing Sites (Other than FS-12) RACR

Captain Copeland shared a video of the Iso-Sphere S3 System. He explained that it has a much larger trommel than the previous contractor had, and this new one is almost as big as the S3 system itself. A video of soil processing was then presented to the RAB. He explains the process as the video plays, drop soil into large trommel, and if too big to be processed it comes out the side on the conveyor into a pile to be sent off-site. The soil gets dropped into the S3 unit to get soil to the right thickness for the belt. There are 14 sensors that scan for DU on the belt. If a sensor indicates a detect, then that batch of

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soil goes to the diverted pile above remediation goals (RGs). Soil that does not exceed RGs goes to the other side on a different conveyor.

Jen commented that the video really helps to show what the process looks like.

Vaughn asked how much longer we are going to be excavating in FS-12? Mike thinks about two years and the speed of the S3 has shaved at least a year off the timeframe. There were no further questions.

### **Bioreactor Treatability Study**

Jeff Morrison, also of Jacobs, then provided Bioreactor Treatability Study update. Jacobs is collaborating with Engineering Research Design Center (ERDC) to evaluate a RDX treatment system for the South Tributary to Brush Creek. He filled the team in on recent activities:

- Submitted 60% Design Drawings/Specifications to EPA and Iowa Department of Natural Resources (IDNR) in August
- Army is reviewing the Treatment Plan for pilot study
- Construction started in early October 2019
- Phase 1 drum testing system configured last week

Jeff clarified that it is a Treatability Study. The purpose of the project is to see if the technology developed by Dr. Heather Smith at the laboratory scale will translate into the field. It is a two phase pilot study, the first phase will be a drum study, as shown in pictures of the slides. Biochar is only in one set of drums, and one set of drums will have biochar and iron.

Jeff showed a series of photographs with an initial layout of drums, flow meters, sample ports, etc. Other photos showed the interior of drums, and how we don't want short circuiting and how it uses the fluidized bed technology.

The aeration system is at the end of the process. All of the smaller scale drums are representative of the larger tank system. The aeration tank is to change conditions back to aerobic and knock out any unwanted discoloration. There were no further questions.

### **Old Business – Action Items from Previous Last Meeting**

Jeff covered the bioreactor action item in his earlier presentation.

Jen stated that the Operational Range Assessment is currently underway. These were conducted previously (and most recently in 2012), and a draft is forthcoming in November.

Vaughn had previously asked about the Demolition Area sampling for silver and gold.

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Jen explains that the 1996 RI makes no mention of gold. But they did sample surface soil and groundwater for TAL metals and they did sample for silver. An interim remedial action for soil and Line 3A was conducted. Silver was not a contaminant of concern (COC) in the ecological risk assessment (just copper).

Mark Hagerla had previously asked about an OU-5 map showing all the fenced in areas. Jen said there is a map provided in the handouts. She then added that two of the sites are in the process of being cleaned up. Mark also wanted a printout of the cleanup figures since the first RAB meeting in 1997 which was also provided in today's handouts.

Jen then discussed the total restoration costs to date at IAAAP. Jen found some information online and explained that it is available to the public as well. Jen showed some tables with costs to date, and made references to DERP goals and Fast Facts.

### Action Items for Today

- Jen suggested getting Aerostar here to present OU-3 Off-site for final monitoring report next meeting.
- Julie would like info about the CERCLA role in demo projects (sampling under buildings).
- Vaughn wants to know why Mathes Lake was switched from drinking water.
- Jen thought the RAB could meet briefly after the meeting adjourns to discuss TAPP.

Next meeting will be January 14, 2020 at 9 a.m.

Meeting adjourned at 11:39 a.m.

Original signed by:



Sarah Brockway  
Secretary

Original signed by:



Elyn Holton-Dean  
Community Co-Chair

Original signed by:



Jen Busard  
Army Co-Chair

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Iowa Army Ammunition Plant  
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Exhibit 1

**GOVERNMENT MEMBERS PRESENT (4)**

LTC Eric J. Schilling  
Dan Cook  
Jen Busard  
Danny O'Connor

**RAB MEMBERS PRESENT (7)**

Vaughn Moore  
Robert Haines  
Dean Vickstrom  
Hans Trousil  
Elyn Holton-Dean  
Julie Solinski  
Bruce Workman

**PUBLIC PRESENT (16)**

Dean Johnson  
Steven Bellrichard  
Jeff Morrison  
Mike Kessler  
Sarah Brockway  
Aaron Steele  
Nicholas Copeland  
Rachel Williams  
Kim-Lee Yarberr  
Linda Latta  
Randy Doyle  
Denny Vacell  
Russ Beckman  
Gifford Haddock  
Harry Mabeus  
Cathy Kropp

Total in attendance: 27