Response to Comments
Liquid Effluent Retention Facility/200 Area Effluent Treatment Facility Class 2 Permit Modification
September 16, 2019 through November 15, 2019

Summary of a public comment period and responses to comments

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For more information contact:

John Temple, Project Manager
Nuclear Waste Program
3100 Port of Benton Boulevard
Richland, WA  99354
Phone:  509-372-7950
Email:  Hanford@ecy.wa.gov


- Headquarters, Lacey  360-407-6000
- Northwest Regional Office, Bellevue  425-649-7000
- Southwest Regional Office, Lacey  360-407-6300
- Central Regional Office, Yakima  509-575-2490
- Eastern Regional Office, Spokane  509-329-3400

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Response to Comments

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September 16, 2019 through November 15, 2019

Nuclear Waste Program
Washington State Department of Ecology
Richland, Washington
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Introduction

The Washington State Department of Ecology’s Nuclear Waste Program (Ecology) manages dangerous waste within the state by writing permits to regulate its treatment, storage, and disposal. When a new permit or a significant modification to an existing permit is proposed, Ecology holds a public comment period to allow the public to review the change and provide formal feedback. (See Washington Administrative Code [WAC] 173-303-830 for types of permit changes.)

Ecology decided to reclassify this permit modification from a Class 2 to a Class 3 using WAC 173-303-830(4)(b)(vi)(A)(III)(AA) as a basis. This reclassification will provide the public an additional 45-day period to comment on the proposed changes to the permit. This Response to Comments purpose is to:

- Specify which provisions, if any, of a permit will become effective upon issuance of the final permit, providing reasons for those changes.
- Describe and document public involvement actions taken in the first public comment period.
- List and respond to all significant comments received during the first public comment period and any related public meeting.

This Response to Comments is prepared for:

Comment period: Liquid Effluent Retention Facility/200 Area Effluent Treatment Facility Class 2 Permit Modification, September 16, 2019 through November 15, 2019


Permittees: U.S. Department of Energy

Original issuance date: January 28, 1998

To see more information related to the Hanford Site and nuclear waste in Washington, please visit our website: https://www.ecology.wa.gov/Hanford.
Response to Comments
LERF/EFT permit modification

Reasons for issuing the permit

This proposed Class 2 modification affects the Liquid Effluent Retention Facility (LERF) and the 200 Area Effluent Treatment Facility (ETF) portion of the Permit. The changes to the Permit will:

- Add a primary waste transfer line from Waste Treatment and Immobilization Plant’s Effluent Management Facility to the LERF and 200 Area ETF permit, and authorize connection of that transfer line to the LERF.
- Add a secondary waste brine loadout system inside ETF.
- Add a filter sump tank to the existing Load-In Station.

Public involvement actions

The U.S. Department of Energy (USDOE) held a 60-day public comment period on the draft LERF/ETF permit modification September 16 through November 15, 2019.

The following actions were taken to notify the public:

- Mailed a public notice announcing the comment period to 1230 members of the public.
- Distributed copies of the public notice to members of the public at Hanford Advisory Board meetings.
- Placed a public announcement display ad in the *Tri-City Herald* on September 16, 2019.
- Emailed a notice announcing the start of the comment period to the Hanford-Info email list, which has 1370 recipients.
- Posted the comment period as an event on the Washington Department of Ecology’s Hanford Facebook and Twitter pages.

USDOE held a public meeting on October 9, 2019, at 5:30 p.m. at the Richland Public Library. Eight members of the public attended, and zero comments were collected formally.

The Hanford information repositories located in Richland, Spokane, and Seattle, Washington, and Portland, Oregon, received the following documents for public review:

- Public notice (fact sheet)
- Transmittal letter
- Statement of Basis for the proposed LERF/ETF Permit Modification
- Draft LERF/ETF Permit Modification

The following public notices for this comment period are in Appendix A of this document:

- Public notice (fact sheet)
- Classified advertisement in the *Tri-City Herald*
- Notice sent to the Hanford-Info email list
- Event posting on the Washington Department of Ecology’s Hanford Facebook and Twitter pages
List of Commenters

The table below lists the names of organizations or individuals who submitted a comment on the LERF/ETF permit modification. The comments and responses are in Attachment 1.

<table>
<thead>
<tr>
<th>Commenter</th>
<th>Organization</th>
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<tr>
<td>Anonymous</td>
<td>Citizen</td>
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<tr>
<td>Mike Conlan</td>
<td>Citizen</td>
</tr>
<tr>
<td>Gerry Pollet</td>
<td>Heart of America Northwest</td>
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Attachment 1: Comments and responses

Description of comments:
Ecology accepted comments from September 16 through November 15, 2019. This section provides a summary of comments we received during the public comment period and our responses, as required by RCW 34.05.325(6)(a)(iii). Comments are grouped by individual and each comment is addressed separately.
I-1: ANONYMOUS CITIZEN

Comment I-1-1

1. Materials Provided for Public Review are Incomplete
Letter 19-ECD-0069 contains the permit modification notification and the information referenced for public review. Letter 19-ECD-0069 states that the Ecology requested additional supplemental technical information to support the Class 2 permit modification development and Ecology's review, but not intended for public comment. I would appreciate if Ecology will make the supplemental technical information (per Attachment 5) public because the public's review is not supported if the material is withheld. The same documentation should be available to support the public's review as supports Ecology's review. For example, Attachment 5 refers to RPP-IQRPE-50054, Rev. 0, Independent Qualified Registered Professional Engineer Design Assessment Report for ETF Brine Loadout System. IQRPE reports are mandatory permit content per the Washington Administrative Code and have been previously released to the public. This report should be made public as part of this permit modification review.

Response to I-1-1

Thank you for your comment. Ecology agrees with your comment and has communicated your concern to the Department of Energy. To provide members of the public the opportunity to review a complete permit modification package, including all information Ecology is using to make a determination, this Class 2 permit modification has been reclassified to a Class 3. This reclassification will provide the public an additional 45-day period to comment on the proposed changes. The Permittees have requested a Temporary Authorization to initiate connection of the 4"-WTP-001-M17 to the LERF Catch Basin 242AL-42. Ecology is reviewing that request.

Comment I-1-2

2. Transfer Line Identification is Unclear
The Permit Conditions and text refer to the "WTP" Primary Transfer Line to LERF Basin 42 (4"-WTP-001-M17). The text is unclear whether this transfer line is specific to the EMF to LERF piping. Are there any other WTP to LERF piping routes? Previously, I thought there was a route to LERF from WTP at the LAW facility or at the PT facility for condensates/effluents, when EMF did not exist. If so, it would help if this new line were clearly called out in the text as the EMF line to LERF and not generically the WTP line. Also, page 2 of the change notice calls the line 4"-WTP-001-M1 7, but page 5, second to last bullet calls it "WTP-001." The previous permit modification request (associated with 242-A Evaporator) referred to this pipeline as a "backup" pipeline. Which is correct? A clarification in the text would help.

Response to I-1-2

Thank you for your comment. Permit conditions referencing the WTP primary transfer line have been updated to consistently name the pipeline as "WTP EMF transfer line to LERF Catch Basin 242-AL (4"-WTP-001-M17)." The permit accurately reflects the pipelines specific to DFLAW operations. The purpose of the modification is to accurately reflect the configuration of the pipelines from WTP to LERF. There are two transfer lines from WTP to LERF: a primary transfer line (4"-WTP-001-M17) and a backup transfer line (3"-WTP-002-M17). This permit modification request includes the primary WTP transfer line. The backup transfer line was recently included in the 242-A Evaporator permit modification.
Comment I-1-3

3. Direction of Flow is Unclear for the EMF to LERF Pipeline

The Fact sheet states that the pipeline is from EMF to LERF. However, sheet 8 of the RCRA Permit Change Notice states that the transfer line is "from LERF Basin 42 to WTP EMF." Is there an intent to return liquid to WTP from LERF? Is the piping equipped with back flow prevention?

Response to I-1-3

Thank you for your comment. The correct statement on the PCN should be "from WTP EMF to LERF Basin 42." There is no intent to return liquid from LERF to WTP. There is no backflow prevention equipment installed in the transfer line. The WTP EMF transfer line to LERF Catch Basin 242-AL (4"-WTP-001-M17) is sloped toward the LERF Catch Basin 242AL-42 and uses a pump located at WTP to transfer waste from WTP to LERF. Shutdown of the pump stops the flow of aqueous waste through the transfer pipeline and the sloped transfer line prevents backflow.

Comment I-1-4

4. The Proposed ETF Brine Loadout System has No NEPA Coverage and Should be Prohibited from Construction because it Implements a Decision that has Not Been Evaluated or Made

Permit Condition III.3.J.5 establishes that "prior to receipt of any dangerous waste in the brine loadout system, the Permittees will submit a revised Addendum A, Part A Form to include a photograph of the 202SE Container Storage Area to the department." Permit Condition III.3.J.9 establishes that "Prior to receipt of any dangerous waste in the Brine Loadout Station, the Permittees will submit functional testing for the automatic shutoff valves (60J-334 and 60J-335) to the department." Section B.1.1 revises the ETF secondary treatment train to include "Brine Loadout." Section B.6.1.2 allows sampling of the brine. Section C.2.4 similarly adds the Brine Loadout System to the ETF Secondary Treatment Train to allow transfer of waste into "totes."

These permit conditions and content are not sufficient to allow dangerous waste brine loadout from Hanford. DOE has not prepared an update to the previous project at ETF that would have grouted the brine on-site. Project ORP-0014.C1, "Secondary Waste/ETF Construction" was on hold as of 2012, per a DOE letter from 2014. This project would have provided at-source grouting of ETF brine. Ecology expressed support for the planned ETF upgrade project in 2009, in a letter encouraging completion of WTP supporting infrastructure. I would appreciate if Ecology would request and review the "on hold" project, because DOE Order 413.3B requirements to revisit the NEPA basis, risk analysis, and independent analysis of alternatives for the abandoned project seem not to have been met. The National Academies of Science have pointed out that the secondary wastes from WTP represent a significant risk.

A review of the NEPA documentation in the Tank Closure and Waste Management EIS shows that an upgrade (not a downgrade) to the ETF Facility was included in the Record of Decision (ROD). The ROD selected Tank Closure Alternative 2B, which requires treatment of secondary waste at ETF (and not elsewhere). The ROD includes using ETF upgrades (not downgrades). The ROD includes disposal of secondary Mixed Low Level Waste and Low Level Waste onsite at the IDF (and not elsewhere) (Waste Management Alternative 2). These items are from the EIS-0391-ROD#1-2013. Detailed sections of the TC&WM EIS show that the analyzed upgrades for ETF did NOT envision a loadout of brine, which would have been a downgrade requiring additional facilities and creating additional risks.
Appendix E of the TC& WM EIS, Section E.1.2.3.3, states that the secondary waste from ETF is a powdery solid waste material (page E-62.) Section E.1.2.3.3.4 states that an example solution for improving secondary waste disposal from WTP was to add a solidification capability to the ETF, however mass balance calculations and preliminary design information were not available. Therefore, specific changes to ETF were not evaluated in the TC&WM EIS. The alternatives assumed as-was ETF processing to a powdery solid, with a replacement ETF available when needed. Complete replacement of the ETF was expected to "bound the environmental impacts of "a solidification capability at the ETF." Nowhere in the TC&WM EIS was downgrading of ETF to ship out brine instead of drying it evaluated or even discussed. The environmental impacts and risks of transportation and handling of liquid ETF brine were not addressed, and certainly not decided. As a result, construction should be prohibited because it wastes funds on a decision not made.


Response to I-1-4

Thank you for your comment. Ecology does not enforce the requirements of DOE Order 413.3B, so any requirements referenced in this comment wouldn't be a basis for Ecology to request that the project be put on hold. When NEPA documents are adopted in whole or in part for state SEPA purposes, it's the environmental analysis that is adopted, not the Federal NEPA decision. The TC&WM EIS NEPA ROD was a DOE decision, not an Ecology decision, and Ecology isn't limited by the DOE decision. SEPA adoption can include alternatives not selected by a Federal agency doing a NEPA analysis.

Ecology is making a SEPA determination for ETF based on TC&WM EIS Section 2.2.2.2.10. The TC&WM EIS analyzed impacts for multiple replacements (i.e., upgrades) of ETF. The TC&WM EIS Tank Closure Alternative 2b, selected in the Record of Decision, analyzed upgrades to ETF to support treatment of waste through the Waste Treatment Plan including additional treatment capacity to grout the secondary waste coming from ETF operations. Secondary waste generated from the retrieval and treatment of tank waste will go to the Integrated Disposal Facility for disposal. The issues related to secondary waste from WTP at ETF is addressed in the TC&WM EIS and summarized in the Ecology forward.

DOE hasn't made a proposal for shipping out the brine, so Ecology has not analyzed the potential adverse environment consequences of shipping it out. Ecology completed a SEPA evaluation for the permit modification request made to Ecology. As part of this permit modification and in response to public comments, Ecology added permit conditions to restrict the operation of the brine loadout system until a disposal and treatment pathway for the liquid brine waste is identified by DOE.
**Comment I-1-5**

5. Tote Design Information is Missing-Tote Waste is New Orphan Waste

The permit modification does not describe brine "totes" sufficiently to determine if they meet DOT regulations for off-site transportation on public roads, as is envisioned. Design parameters and operating conditions for, the totes are not described. A corrosion analysis or material compatibility analysis is not provided. Waste acceptance criteria and permitting for the unidentified receiving facilities are not provided. Filled totes appear to be another "orphan" waste, without an actual disposal path. This is similar to the case of the new "orphan" loaded non-elutable cesium ion exchange columns from the Tank Side Cesium Removal Project, where WTP has no capability, no design, and no funding to receive or process them.

**Response to I-1-5**

Thank you for your comment. Addendum B, Waste Analysis Plan, identifies the disposition pathway for the brine totes is to an authorized permitted treatment, storage, and/or disposal facility. If off-site transportation is necessary, the totes will be shipped in accordance with DOT requirements. The totes have been through an equivalency process and evaluated to ensure they meet the packaging requirements in accordance with 49 CFR 173.427(b)(4).

A radiation and chemical evaluation was performed for the tote component materials identified by the manufacturer and the manufacturer determined the materials to be resistant to degradation based on the predicted radiation exposure over a selected five-year tote service life from the bounding ETF brine streams. The chemical evaluation indicates that the four tote component materials identified by the manufacturer should be resistant to the predicted, bounding chemical exposure at the required low tote operating temperature, 100 degrees Fahrenheit, with transient temperature excursions to 122 degrees Fahrenheit.

An IQRPE report submitted as supplemental information to the permit modification identifies the components of the brine loadout system that will come into contact with the liquid brine waste and provides a compatibility analysis. The IQRPE concluded that there are no compatibility issues between materials of construction and the liquid brine waste in which they will come into contact. As part of this modification and in response to public comments, Ecology added a condition that, prior to operating the brine loadout system, requires DOE demonstrate that the liquid brine waste stream will be shipped to authorized treatment, storage, or disposal facilities for treatment and disposal and imposing storage limits.

**Comment I-1-6**

6. Leachate Disposal from Landfills is Unclear

Section B.1.2 (page Addendum B.8) deletes the Environmental Restoration Disposal Facility landfill from the examples of sources of leachate to be treated at ETF. Is this change intended to exclude ERDF leachate? Will leachate from the IDF also be accepted at ETF?

**Response to I-1-6**

Thank you for your comment. The Environmental Restoration Disposal Facility (ERDF) leachate is now sent to the 200 West Pump and Treat facility. The 200 Area ETF will only receive ERDF leachate if the 200 West Pump and Treat facility is not available. In the future, the Integrated Disposal Facility leachate will be sent to the 200 Area ETF.
Comment I-1-7

7. Treatment of ETF Secondary Waste is too Vague
Section B.2.2.3 (page Addendum B.12) states that containers of secondary waste from ETF will be transferred to an "appropriate" treatment, storage, or disposal facility. Examples of the Central Waste Complex or ERDF are provided without providing limitations that are consistent with the EIS Record of Decision. The EIS requires disposal of the ETF secondary or treated waste on-site, and it does not provide for off-site treatment or on-site storage of liquids. Limitations consistent with the EIS should be included here. In addition, waste acceptance criteria are documented and available for the Central Waste Complex and ERDF, but not for any off-site brine treatment facility.

Response to I-1-7

Thank you for your comment. Please see our response to comment I-1-4.

Comment I-1-8

8. Authorization and Environmental and Risk Evaluation Process Limitations for ETF Brine are Omitted
Section B.6.1 (page Addendum B.22) states that ETF dangerous waste brine may be transferred to an "authorized" dangerous waste facility for additional treatment. The limitations on what is authorized should be stated. The TC&WM EIS requires the brine, if any, to be grouted at ETF and not stored as a liquid or sent off site. As shown above, these scenarios were NOT analyzed in the EIS. Nor were they selected in any of the TC&WM EIS Records of Decision. The risks of shipping and treating this material have not been analyzed for impacts to the public and the environment.

Response to I-1-8

Thank you for your comment. Please see our response to comment I-1-4.

Comment I-1-9

9. Perma-Fix is the Intended Baseline Pathway for ETF Brine, Without Any Environmental, Safety or Technical Basis ORP Operational Awareness Database Entry No. 37276, "Chief Engineer/ TPD/TOD/MIO/ECD review of DFLAW Readiness, Downstream Treatment & Disposal (LERF, ETF, Off-Site Treatment of MLLW, SALDS, TEDF, IDF," April 2018, shows that "the bottleneck in the ETF process for some waste streams is the thin film dryer, which reduces the waste to a powder form. To address this the plant can be modified with a brine load-out port to bypass the thin-film dryer, taking liquid waste to Permafix for grouting (transported in 330 gallon totes). This is the baseline plan for DFLAW."

The entry further states that: "There is an outstanding question whether Permafix will have its SEPA done and permits in place to support off-site solidification consistent with the One System Decision Document on the subject (OSDD 4). "..."There is a question whether Permafix has the physical capacity and personnel required to handle the volume of waste which will be generated from the DFLA W operations. "..."There is a lot of ammonia in the ETF feed. Throughout the ETF process, pH is adjusted to 5. 0 to keep the ammonia as ammonium, and keep it from evolving. Permafix would have to neutralize the brine solution to make grout, which would evolve the ammonia. Permafix has not raised concerns, but there is concern that Permafix may be underestimating the amount of ammonia that will evolve. "... There is a question
regarding on how transportation of ORP waste from Hanford to Permafix will be documented for NEPA purposes. "Suggest DOE consider treating waste on site to meet LDR requirements, similar to what was done prior to 2008, when capacity existed at Central Waste Complex, WRAP and T-Plant to treat waste." The brine solution coming to Perma-Fix from ETF would be approximately 82,000 gallons per year. Primary Waste Constituents include 99-Tc 8.86E+06 pCi/L, Hg 2.1 mg/L, ...

Putting the ETF Solidification Upgrade Project on hold was predicated on ETF not being as a result a bottleneck. The result has been a poor decision to use a "baseline" off-site process that has no environmental basis, and perhaps will generate new safety risks. Revisiting Central Waste Complex or WRAP capacities that have been abandoned would be a good idea, as suggested above. These facilities are farther from the public and subject to more transparent reporting.

Response to I-1-9

Thank you for your comment. The draft permit modification includes the current operating configuration for LERF/ETF and we do not have information regarding Perma-Fix accepting the brine waste for treatment. Perma-Fix is not the subject of this permit modification. As part of this modification and in response to public comments, Ecology added a permit condition that, prior to operating the brine loadout system, requires DOE demonstrate that the liquid brine waste stream will be shipped to authorized treatment, storage, or disposal facilities for treatment and disposal.

Comment I-1-10

10. A Comparison is Needed Since Perma-Fix is the DFLAW "baseline" I would appreciate if Ecology will draw a circle on a map around ETF for a distance of two miles. Then draw a circle around Perma-Fix for a distance of two miles. How many members of the public are affected in each case? How many if the distance is 5 miles? There are lessons from the recent contamination of a school near Portsmouth, Ohio from a nearby DOE facility. DOE should not be allowed to construct (implement a decision) without a public review and NEPA record of decision. In addition PERMA-FIX treats mainly Hanford waste, based on EPA biennial report records. Because the amounts from Hanford reported are well above 50%, Ecology should request that Permafix be included in the Hanford Air Operating Permit, so that its stack and boundary are evaluated. The current Hanford Air Operating Statement of Basis incorrectly states that "the share of PFNW service output provided to DOE Hanford operations is currently less than 50%" such that "PFNW is not included in the Hanford Site Title V AOP." This error should be corrected.


Response to I-1-10

Thank you for your comment. Please see our response to comment I-1-4 with regards to NEPA. The Air Operating Permit (AOP), renewal 3, was issued in July 2019. The statement cited in your comment is not in the AOP renewal 3, so removal of the statement has already taken place. Consideration for inclusion in the AOP is based on more than a percentage of an entity’s output provided to DOE Hanford Site operations office. Other criteria are listed in the Statement of Basis for the Standard Terms and General Conditions of AOP Renewal 3. Perma-Fix Northwest may be reevaluated for inclusion in the Hanford AOP upon the next AOP renewal or revision.

I-2: MIKE CONLAN

Comment I-2-1

1. Remove all nuclear waste,
2. Do not allow anymore nuclear waste into the facility,
3. Replace all the single storage tanks,
4. Stop all the nuclear leakage entering the Columbia River

Response to I-2-1

Thank you for your comment.

1. Ecology is working to ensure that long-term storage, treatment, and disposal of the waste is protective of human health and the environment.
2. The proposed permit changes are not to allow additional nuclear waste into the Hanford Facility, but to better manage the waste already present.
3. Single-shell tanks (SSTs) are not in the scope of this comment period. Ecology does agree that the tanks pose a threat. Ecology believes a better approach to replacing the SSTs is to remove the waste from the SSTs and placing it in the compliant double-shell tanks (DSTs) to prepare for eventual treatment in the Waste Treatment Plant that is now being built.
4. The LERF and 200 Area ETF maintains a groundwater monitoring program in which groundwater is sampled to detect for releases from the facility. Monitoring is performed on a quarterly and semianually basis. This monitoring program helps prevent migration of contaminated groundwater into the Columbia River.

O-1: HEART OF AMERICA NORTHWEST

Comment O-1-1

Heart of America requests:

Information / data which should have been in the permit modification and a technical fact sheet for the unit(s), and which we requested, include:

i. The annual quantities of dangerous wastes with characteristics to be transferred, stored or treated through the pipelines and facilities;

ii. The quantities and characteristics of batches of wastes to be held in LERF units, including radionuclides (while RCRA and HWMA do not require the listing of radionuclides that are not
also a dangerous waste due to toxicity or other characteristics [e.g. radioactive heavy metals such as Uranium], the SEPA analysis of potential impacts must consider the potential significant impacts from generation, release and disposal of those waste elements and their cumulative health or environmental impacts with those from dangerous wastes).

iii. Specifically, please disclose the constituents and concentrations in brine which was referred to in presentations on October 9 and is the term added to the permit describing wastes to be permitted, e.g., regarding 2025-E containerized wastes to be permitted and stored in addition to dry powder wastes (see, for example, page A.6). Please provide annual quantities and total amounts allowed to be stored.

Response to O-1-1

Thank you for your comment.

(i) The future annual waste quantity that will be sent to LERF and 200 Area ETF for treatment is estimated at: 0.3 million gallons (Mgal) to 0.75 Mgal from Mixed Waste Trenches leachate; 0.60 Mgal to 3.9 Mgal from IDF leachate; 0.40 Mgal to 1.7 Mgal for the 242-A Evaporator; and 3.8 Mgal to 5.4 million gallons from the Effluent Management Facility. These are only estimates and are subject to change.

(ii) The Part A Form identifies the characteristics of the wastes to be managed in the LERF basins and the capacity of the basins. Ecology made a March 15, 1990, SEPA determination to authorize construction and operation of LERF. A copy of that determination is available upon request to Ecology. Ecology is relying on the Tank Closure and Waste Management Environmental Impact Statement for the current reclassified permit modification. A SEPA determination/adoption notice will be available for public review during the Class 3 public comment period;

(iii) The nature of the brine waste. Brine waste is not a new waste, it is just being removed from the ETF treatment process prior to being routed through the Thin Film Dryer. The amount of brine allowed to be stored at the ETF is based on tote size and spatial availability. The volume of brine stored within the ETF container storage areas will not exceed the amount allowed per available secondary containment. The annual quantity of waste stored in tanks and containers at the ETF is 2,669,000 gallons, per the Part A Form. Brine describes the concentrated liquid waste primarily resulting from treatment through the ETF Evaporator and other miscellaneous streams. The brine will maintain the same characteristics and concentrations as the powder waste that is currently produced by the Thin Film Dryer.

Comment O-1-2

Brine sounds as if it is a saltwater solution. Indeed, that is its dictionary definition. Brine is not a defined term pursuant to the dangerous waste rules in WAC 173-303- 040. Without disclosure of the contents in the permit and fact sheet, USDOE cannot use this term and Ecology cannot have an undefined term with no limitations and description on dangerous waste constituents. Use of the term brine is misleading and not permissible without describing the specific constituents. Without these disclosures, it is not possible to comment on adequacy of the permit conditions for storage in a facility which is currently permitted only for storage of dry powder.
Response to O-1-2

Thank you for your comment. Brine waste is not a new waste, it is just being removed from the ETF treatment process prior to being routed through the Thin Film Dryer. The amount of brine allowed to be stored at the ETF is based on tote size and spatial availability. The volume of brine stored within the ETF container storage areas will not exceed the amount allowed per available secondary containment. The annual quantity of waste stored in tanks and containers at the ETF is 2,669,000 gallons, per the Part A Form. Brine describes the concentrated liquid waste primarily resulting from treatment through the ETF Evaporator and other miscellaneous streams. The brine will maintain the same characteristics and concentrations as the powder waste that is currently produced by the Thin Film Dryer.

Comment O-1-3

This request includes SEPA analyses, which would require consideration of radioactive constituent impacts in the event of release (including failure of secondary containment) or long-term release or exposures from disposal of the ultimate waste forms in the IDF landfill.

i. There is no linked SEPA analysis and documents in the notice or permit modification transmittal.

Response to O-1-3

Thank you for your comment. SEPA documentation is not a requirement for a Class 2 permit modification. Since the modification has been reclassified to a Class 3, the SEPA analysis and documents will be available for public review during the second portion of the public comment period.

O-2: HEART OF AMERICA NORTHWEST

Comment O-2-1

Heart of America Northwest requests:

a) An extension of the comment period for the permit modification for thirty days from when USDOE provides the information requested at the public meeting held on October 9, 2019 on waste quantities, characteristics, constituents and concentrations to be transferred, stored and processed.

i. The annual quantities of dangerous wastes with characteristics to be transferred, stored or treated through the pipelines and facilities;

ii. The quantities and characteristics of batches of wastes to be held in LERF units, including radionuclides (while RCRA and HWMA do not require the listing of radionuclides that are not also a dangerous waste due to toxicity or other characteristics [e.g. radioactive heavy metals such as Uranium], the SEPA analysis of potential impacts must consider the potential significant impacts from generation, release and disposal of those waste elements and their cumulative health or environmental impacts with those from dangerous wastes).

iii. Specifically, please disclose the constituents and concentrations in "brine" which was referred to in presentations on October 9 and is the term added to the permit describing wastes to be permitted, e.g., regarding 2025-E containerized wastes to be permitted and stored in addition to
dry powder wastes (see, for example, page A.6). Please provide annual quantities and total amounts allowed to be stored.

Response to O-2-1

Thank you for your comment. Please see our response to comment O-1-1.

Comment O-2-2

"Brine" sounds as if it is a saltwater solution. Indeed, that is its dictionary definition. "Brine" is not a defined term pursuant to the dangerous waste rules in WAC 173-303-040. Without disclosure of the contents in the permit and fact sheet, USDOE cannot use this term and Ecology cannot have an undefined term with no limitations and description on dangerous waste constituents. Use of the term "brine" is misleading and not permissible without describing the specific constituents. Without these disclosures, it is not possible to comment on adequacy of the permit conditions for storage in a facility which is currently permitted only for storage of dry powder.

Response to O-2-2

Thank you for your comment. Please see our response to comment O-1-2.

Comment O-2-3

b. This request includes SEPA analyses, which would require consideration of radioactive constituent impacts in the event of release (including failure of secondary containment) or long-term release or exposures from disposal of the ultimate waste forms in the IDF landfill.

i. There is no linked SEPA analysis and documents in the notice or permit modification transmittal.

Response to O-2-3

Thank you for your comment. Please see our response to comment O-1-3.

O-3: HEART OF AMERICA NORTHWEST

Comment O-3-1

Heart of America Northwest requests:

a) An extension of the comment period for the permit modification for thirty days from when USDOE provides the information requested at the public meeting held on October 9, 2019 on waste quantities, characteristics, constituents and concentrations to be transferred, stored and processed.

a. Information / data which should have been in the permit modification and a technical fact sheet for the unit(s), and which we requested, include:

i. The annual quantities of dangerous wastes with characteristics to be transferred, stored or treated through the pipelines and facilities;

ii. The quantities and characteristics of batches of wastes to be held in LERF units, including radionuclides (while RCRA and HWMA do not require the listing of radionuclides that are not also a dangerous waste due to toxicity or other characteristics [e.g. radioactive heavy metals such
as Uranium], the SEPA analysis of potential impacts must consider the potential significant
impacts from generation, release and disposal of those waste elements and their cumulative
health or environmental impacts with those from dangerous wastes).

iii. Specifically, please disclose the constituents and concentrations in "brine" which was referred
to in presentations on October 9 and is the term added to the permit describing wastes to be
permitted, e.g., regarding 2025-E containerized wastes to be permitted and stored in addition to
dry powder wastes (see, for example, page A.6). Please provide annual quantities and total
amounts allowed to be stored. "Brine" sounds as if it is a saltwater solution. Indeed, that is its
dictionary definition. "Brine" is not a defined term pursuant to the dangerous waste rules in
WAC 173-303-040. Without disclosure of the contents in the permit and fact sheet, USDOE
cannot use this term and Ecology cannot have an undefined term with no limitations and
description on dangerous waste constituents. Use of the term "brine" is misleading and not
permissible without describing the specific constituents. Without these disclosures, it is not
possible to comment on adequacy of the permit conditions for storage in a facility which is
currently permitted only for storage of dry powder.

b. This request includes SEPA analyses, which would require consideration of radioactive
constituent impacts in the event of release (including failure of secondary containment) or long-
term release or exposures from disposal of the ultimate waste forms in the IDF landfill.

i. There is no linked SEPA analysis and documents in the notice or permit modification
transmittal.

b) Consolidation of the permit comment periods, including SEPA analyses, for this permit and
the interrelated pending Class 3 permit modification for the DFLAW Effluent Management
Facility (EMF) and its transfer lines to ETF and LERF.

a. These permits are not only closely interrelated but require SEPA analyses of those
interrelationships.

b. The Department should consolidate, rather than allow a permittee to bifurcate, interrelated
permit modifications. This would provide for better public review as well as integrated review
under SEPA by the Department.

c. When two or more permit modifications are closely related to each other and involve the same
systems (e.g., connected transfer lines for the same wastes, and transfer of the same wastes),
SEPA requires consideration of the interrelated systems and impacts. It defeats the intent of the
Department's rules for modifications if a permittee may bifurcate or trifurcate interrelated permit
modifications for transferring and treating the same wastes and avoid having closely related
modifications subject to the greater public review opportunities of a Class 3 Modification.

Response to O-3-1

Thank you for your comment.

a) Ecology agrees that the public should be offered the opportunity to review the permit
modification using information requested at the October 9, 2019, public meeting. To facilitate
this, we have decided to reclassify the permit modification to a Class 3 under WAC 173-303-
830(4)(b)(vi)(A)(III)(A4), which will include a 45-day public comment period as required by
Class 2 permit modifications are not required to include a technical fact sheet. All requirements for a Class 2 permit modification are located in WAC 173-303-830(4)(b). Information requested at the October 9, 2019, public meeting will be made available during the public comment period for the Class 3 permit modification. Supporting documentation will be available through the Operating Record. As requested, this information includes:

(i) The future annual waste quantity that will be sent to LERF and 200 Area ETF for treatment is estimated at: 0.3 million gallons (Mgal) to 0.75 Mgal from Mixed Waste Trenches leachate; 0.60 Mgal to 3.9 Mgal from IDF leachate; 0.40 Mgal to 1.7 Mgal for the 242-A Evaporator; and 3.8 Mgal to 5.4 million gallons from the Effluent Management Facility. These are only estimates and are subject to change.

(ii) The Part A Form identifies the characteristics of the wastes to be managed in the LERF basins. Ecology made a March 15, 1990 SEPA determination to authorize construction and operation of LERF. A copy of that determination is available upon request to Ecology. Ecology is relying on the Tank Closure and Waste Management Environmental Impact Statement for the current reclassified permit modification. A SEPA determination/adoption notice will be available for public review during the Class 3 public comment period;

(iii) The nature of the brine waste. Brine waste is not a new waste, it is just being removed from the ETF treatment process prior to being routed through the Thin Film Dryer. The amount of brine allowed to be stored at the ETF is based on tote size and spatial availability. The volume of brine stored within the ETF container storage areas will not exceed the amount allowed per available secondary containment. The annual quantity of waste stored in tanks and containers at the ETF is 2,669,000 gallons, per the Part A Form. Brine describes the concentrated liquid waste primarily resulting from treatment through the ETF Evaporator and other miscellaneous streams. The brine will maintain the same characteristics and concentrations as the powder waste that is currently produced by the Thin Film Dryer.

b. Please see ii response, above.

i. SEPA documentation is not a requirement for a Class 2 permit modification. Since the modification has been reclassified to a Class 3, the SEPA analysis and documents will be available for public review during the second portion of the public comment period.

b) Ecology strives to coordinate public comment periods when possible. This comment was made during the public comment period for the Class 2 permit modification. After reclassifying the permit modification to a Class 3, Ecology decided to schedule the second portion of the Class 3 comment period at the same time as DFLAW.

a. Please see b) response, above.

b. Please see b) response, above.

c. Please see b) response, above.

Comment O-3-2

Due to the permit application failing to include the waste characteristics, quantities, etc. described above, in addition to extending the permit comment period, Ecology should not approve the permit modification. The permit application should be rejected and consolidated with the inter-related Class 3 Permit Modification for the same wastes and connected pipelines and systems for EMF. Ecology should require SEPA documentation to be included in the notice.
for both sets of permit modifications. At this point, there is no SEPA analysis for this permit modification.

**Response to O-3-2**

Thank you for your comment. Ecology agrees that the permit modification should not be approved as a Class 2 permit modification. Ecology has decided that a Class 3 permit modification is more appropriate, and with this reclassification the public is offered an additional 45-day public comment period. This comment period will take place concurrently with the Class 3 permit modification to the Direct Feed Low Activity Waste (DFLAW) portion of the Waste Treatment Plant permit, anticipated to run February 3, 2020 through March 19, 2020. Ecology does not provide a SEPA determination for Class 2 permit modifications. SEPA documentation will be provided with the Class 3 permit modification for public review.

**Comment O-3-3**

WAC 173-303-806 requires that a Class 2 Modification meet all elements of a Final Facility Permit in WAC 173-303-806. These requirements include a waste analysis plan ad analysis of all wastes. The current proposed modification includes wastes transferred from the pending Class 3 permit modification for wastes from DFLAW which have not yet been incorporated into the facility permit. Therefore, either this Class 2 permit modification must be withdrawn / rejected and processed as part of the pending Class 3 Modification, or the permit must have the waste streams specified with quantity limitations.

**Response to O-3-3**

Thank you for your comment. Effluent waste streams from DFLAW to the LERF and 200 Area ETF are required to meet the waste acceptance criteria outlined in Addendum B, Waste Analysis Plan. The WTP will provide analysis data from representative samples to verify that the effluent meets the LERF and 200 Area ETF Addendum B waste acceptance criteria. Additionally, the Class 2 permit modification is being reclassified to a Class 3 permit modification, allowing the public an additional 45-day public comment period which will coincide with the public comment period for the DFLAW Class 3 permit modification.

**Comment O-3-4**

Leak detection and secondary containment provisions of the proposed permit are not adequate and are not permissible:

USDOE seeks approval of a permit with a waiver of the requirements for secondary containment and ability to notify Ecology of releases from primary or secondary containment within 24 hours. See III.J.2 for transfer lines WTP's EMF to LERF. This illustrates the interconnection with the pending Class 3 Permit Modification for transfer lines for DFLAW, including LAW facility to EMF. This should be rejected. USDOE should be required to meet the 24 hour notification, if not have real time notification required due to the nature of these wastes, the length of the pipelines, etc. If this alternative were available for this facility and transfer lines, Ecology would have to grant the same waiver anywhere in Washington. USDOE, the permit applicant, has a record of failing to notify Ecology in a timely manner of releases. Consideration of the permittee's prior noncompliance for notifications is also highly relevant.

To qualify for the variance requested, WAC 173-303-640(4)(i)(D) requires disclosure and consideration of the characteristics and contents of the wastes in the transfer lines and storage
Response to O-3-4

Thank you for your comment. USDOE is not requesting a variance from the secondary containment requirements of WAC 173-303-640(4) because the WTP EMF transfer line to LERF Catch Basin 242AL-42 (4" WTP-001-M17) meets the requirements of WAC 173-303-640(4)(a) through WAC 173-303-640(4)(c). The design is pipe-in-pipe construction with an electronic leak detector located at the LERF Basin 42 catch basin. USDOE provided a demonstration that detection of a leak within 24 hours is dependent upon the leak rate and location along the 6,340-foot pipeline. This demonstration concluded that a leak rate of 1.66 gallons per minute would be required to be detected within 24 hours. The sight glass offers a secondary option for the Permittees to inspect for leaks.

The estimated annual quantity of waste to be received at LERF from future DFLAW operations is being developed; therefore the following value is subject to change. The estimated annual quantity of waste for secondary wastes from DFLAW (EMF evaporator condensates and scrubber waste streams) subject to this permit modification range from 3.8 million gallons to 5.4 million gallons.

Comment O-3-5

The sumps and vaults in the proposed permit scope do not have 100% containment capacity. This is a serious shortcoming for the highly radioactive and dangerous wastes generated and being transferred from DFLAW.

USDOE contends that an internal building floor with no berming is containment for the sump or vaults. This does not meet the RCRA / HWMA requirements and poses a grave risk of worker exposure to dangerous wastes as well as the potential for ultimate escape and release to the environment. Allowing waste to spread over a large area of sealed concrete floor is not containment. This is compounded by use of older equipment and not requiring automatic backflow detection and overflow prevention. Instead the sump relies on visual observation.

Response to O-3-5

Thank you for your comment. To meet the requirements of WAC 173-303-640(4)(e), containment capacity needs to be designed to contain one hundred percent of the volume of the largest tank. Ecology is not sure which portion of the facility your comment is referring to, but we believe that the ETF facility meets the tank secondary containment capacity requirements as outlined in WAC 173-303-640(4). Document CHPRC-01900 provides tank capacity and secondary containment calculations and will be made available for public review during the second portion of the Class 3 public comment period.

Secondary containment for the filter drain sump tanks 59A-TK-2 and 59A-TK-3 is described in Section C.4.3.1.2. The filter drain sump tanks 59A-TK-2 and 59A-TK-3 are located in the Load-In Station building, and the Load-In Station drain to the Load-In Station pit that provides secondary containment.
Unplanned spills and releases to the environment are addressed in Addendum J, Contingency Plan, and require the Building Emergency Director (BED) to assess each incident to determine the response necessary to protect the personnel, facility, and the environment.

Comment O-3-6
Reliance on Visual Inspection and only 1 Electronic Detection is Inadequate and Should be Rejected:

The lack of 100% containment for the sumps, sump pumps and other collection points and tanks is exacerbated by the legally inadequate proposed reliance on visual inspection (with apparently one point of electronic leak detection). Sump tank 59ATK-3 will only have a "sight glass to indicate level" and manual pump for overflow protection, instead of automatic cutoff. Reliance on proper following of protocols for visual inspections is particularly inappropriate in event of other upset conditions in the facilities which may interfere with visual inspections, simple operator inattention, and due to a history of the Hanford site contractors even ignoring results of alarms for overflows and leaks (e.g., Tank AY-102). A recording of any overflow or release event is vitally important for permitting and to ensure that a release is reported in a timely manner. Reliance on a written report following visual inspection is not acceptable.

Response to O-3-6
Thank you for your comment. Filter drain sump tank 59A-TK-3 is sized to accommodate the discrete volume of wastewater held within the filter housing and a sight glass will be used for monitoring the level within the tank. Ecology believes these are appropriate overfill prevention controls to meet WAC 173-303-640(5)(b)(ii).

Comment O-3-7
USDOE has failed to specify in the permit how releases will be contained. Rather, USDOE relies on the entire building floor and walls as containment, which would prevent the workforce from entering and carrying out other essential activities or immediate repairs.

Response to O-3-7
Thank you for your comment. If this comment is in reference to the Brine Loadout System, the 2025E walls are coated with a special protective coating to a height of six inches and the floors are coated with a special protective coating. The floors of Building 2025E are sloped to channel releases from the dangerous waste management units to one of two sump tanks located below floor level. In the event of a release to the environment, the Permittees are required to notify Ecology and, if necessary, implement the Contingency Plan. Refer to our response to comment O-3-5 regarding personnel protection.

Comment O-3-8
Only one tank will also have a manual override instead of all tanks in the event of equipment malfunction. This opens additional routes of potential release. The permit should require manual overrides as well as electronic release notifications and routine inspections.

Response to O-3-8
Thank you for your comment. Only tank 59A-TK-3 is proposed to be added to the permit. This permit modification corrects the permitting of tank 59A-TK-2 from ancillary equipment to a tank system. Tank 59A-TK-2 exists, and was previously identified as ancillary equipment to the Load-
In Station Tank 59A-TK-1. The discrete sizing of these tanks decreases the chance for release due to overfilling. Inspections will be performed on these tanks in accordance with WAC 173-303-640, and as described in Addendum I, Inspection Requirements. Requirements for other tanks at the facility are not within the scope of this permit modification.

**Comment O-3-9**

The use of fiberglass four inch transfer lines for EMF to the LERF basins is inappropriate. These long, outdoor lines will be expected to be in use for decades and will be subject to frost and precipitation, soil movement, etc. This is exacerbated by "a single-point electronic leak detection element at LERF Basin 42." (USDOE-RL public meeting presentation October 9, 2019). Single point detection, which is NOT along the very long, outdoor transfer line is not permissible. It is quite likely that releases along the line would go undetected by a single end point (basin) detection element. Metal piping with cathodic protection should be required as consistent with WAC, in conjunction with multiple leak detection points.

**Response to O-3-9**

Thank you for your comment. The requirements of WAC 173-303-640(3) for a new tank system, as defined under WAC 173-303-040, do not require outdoor transfer lines be made out of metal. The requirement is that the pipeline be constructed of material that will withstand external corrosion factors, be compatible with the dangerous characteristics of the waste to be handled, and be supported against physical damage due to environmental and vehicular stresses. Metal pipelines must be provided with corrosion protection as recommended by an independent corrosion expert. However, since the external portions of the tank system (i.e. the transfer line) that will be in contact with the soil are composed of a corrosion-resistant material (e.g. fiberglass) an evaluation by a corrosion expert is not required. Ecology is requiring the Permittees submit a tightness test of the WTP EMF transfer line to LERF Catch Basin 42 (4"-WTP-001-M17) prior to receiving dangerous waste at LERF. Please see response to comment O-3-4 regarding detection of a leak and leak rate.
Appendix A: Copies of all public notices

Public notices for this comment period:

- Public notice (fact sheet)
- Classified advertisement in the *Tri-City Herald*
- Notice sent to the Hanford-Info email list
- Event posting on Washington Department of Ecology – Hanford’s Facebook and Twitter pages
Proposed Class 2 Permit Modification for the Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility

The U.S. Department of Energy (DOE) is holding a 60-day public comment period on a proposed modification to the Hanford Dangerous Waste Permit. The proposed modification would allow DOE to connect a waste transfer line from the Waste Treatment and Immobilization Plant’s Effluent Management Facility (EMF) to the Liquid Effluent Retention Facility (LERF), and to make improvements to the 200 Area Effluent Treatment Facility (ETF) in preparation for tank waste treatment.

PUBLIC COMMENT PERIOD: SEPT. 16 to NOV. 15, 2019

Background
The Hanford Site occupies 580 square miles in southeastern Washington state. Beginning in 1943, the Site produced plutonium for the nation’s defense program. Plutonium production ceased in the late 1980s. Today, waste management and environmental cleanup are the primary missions at Hanford.

DOE and its contractor Washington River Protection Solutions have requested a Class 2 modification to the LERF and 200 Area ETF chapter of the Hanford Dangerous Waste Permit. The LERF and 200 Area ETF receive process wastewater from the 242-A Evaporator and other Hanford remediation and waste management activities. Wastewater from LERF is pumped to the 200 Area ETF for treatment to remove contaminants. The ETF is located near the center of the Hanford Site in the 200 East Area (see map).

Overview
The permit establishes requirements to ensure that waste management activities protect human health and the environment. DOE has proposed a Class 2 modification to the permit pursuant to Washington Administrative Code WAC 173-303-830, which requires a 60-day public review process.

Summary of Changes
If approved, the modification would allow DOE to connect a waste transfer line from EMF to LERF and to make improvements to the 200 Area ETF so that it can support tank waste treatment. The improvements include adding a secondary waste load-out system inside ETF and adding a filter sump tank to the existing load-in station. This requires modification to the permit conditions and applicable addenda. Modifications to the addenda include revised information on the LERF and the 200 Area ETF boundary, the waste analysis plan, facility improvements, container management, leak detection, closure and inspection requirements.
Permit Addenda Affected by this Modification:

- Permit Conditions
- Addendum A, Part A Form
- Addendum B, Waste Analysis Plan
- Addendum C, Process Information
- Addendum F, Preparedness and Prevention
- Addendum H, Closure Plan
- Addendum I, Inspection Requirements
A 60-day public comment period will begin Sept. 16 and will continue through Nov. 15. A public meeting will be held on Oct. 9 at 5:30 p.m. at the Richland Public Library, 955 Northgate Drive, Richland, Washington 99352.

To request disability accommodation, please contact Jennifer Colborn, Jennifer_M_Colborn@rl.gov, (509) 376-5840, at least 10 working days prior to the event.

All comments must be submitted by Nov. 15 in writing by mail or electronically (preferred) to:
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, WA 99354
http://wt.ecology.commentinput.com/?id=pSNds (preferred)

At the conclusion of the public comment period, the Washington State Department of Ecology will address public comments and prepare a Response to Comment document.

Copies of the proposed modification and supporting documentation will be available online during the public comment period at http://go.usa.gov/xyMaZ, on Ecology's website at http://go.usa.gov/xyCer, and at the Hanford Public Information Repositories at https://go.usa.gov/xVDxC.
Public Involvement Opportunity

We want to hear from you on the proposed changes to the LERF and 200 Area ETF chapter of the Hanford Dangerous Waste Permit!

Comment Period: September 16 to November 15, 2019
Public Meeting: October 9, 2019, 5:30 p.m., Richland Public Library
PACIFIC NORTHWEST

The differences between
Kennewick and Pasco,
both communities where
you can focus on a school level.
Kennewick and Pasco are two
western counties with their
town on the western coun-
terparts in the Tri-Cities.

Reykdal said in a news
conference, “I'm quite
excited about the
progress that has
been made.”

For example, more than
80 percent of students
were at grade level in
both math and English.

For instance, if a stu-
dent scored a 75 on a test,
when the tests data to see if stu-
dents are improving.

Kennewick is one of the
three districts in the
state that has made
gained on their peers at a
third of the students are
doing better than their
other student who scored
a 75 on a test, students are
improving.

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80 percent of students
were at grade level in
both math and English.
This is a message from the U.S. Department of Energy

Notice of Public Comment Period on Proposed Changes to the Hanford Dangerous Waste Permit

The U.S. Department of Energy (DOE) is planning a 60-day public comment period on a proposed modification to the Hanford Dangerous Waste Permit. This proposed Class 2 permit modification would allow DOE to connect a waste transfer line from the Waste Treatment and Immobilization Plant’s Effluent Management Facility to the Liquid Effluent Retention Facility and make improvements to the 200 Area Effluent Treatment Facility to ensure the facility is ready for Direct Feed Low-Activity Waste operations. The Effluent Treatment Facility improvements include adding a secondary waste load-out system inside the facility and adding a filter sump tank to the existing waste load-in station.

The public comment period is expected to begin in September, with a public meeting in October.

The proposed modification will be available online during the comment period at Hanford Administrative Record and at the Public Information Repositories located in Richland, Seattle, Spokane and Portland.

A summary fact sheet and details of the public meeting will be provided when the comment period begins.

Questions? Please contact Paula Call, DOE, paula.call@orp.doe.gov or Daina McFadden, Ecology, at Hanford@ecy.wa.gov.

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Subscribe or Unsubscribe
This is a message from the U.S. Department of Energy

Public Comment Period on Proposed Changes to the Hanford Dangerous Waste Permit

The U.S. Department of Energy (DOE) and Washington State Department of Ecology (Ecology) are holding a 60-day public comment period on a proposed modification to the Hanford Dangerous Waste Permit. This proposed Class 2 permit modification would allow DOE to connect a waste transfer line from the Waste Treatment and Immobilization Plant’s Effluent Management Facility to the Liquid Effluent Retention Facility and make improvements to the Effluent Treatment Facility (ETF) to ensure the facility is ready for Direct-Feed Low-Activity Waste operations. The ETF improvements include adding a secondary waste load-out system inside the facility and adding a filter sump tank to the existing waste load-in station.

The comment period is from Sept. 16 to Nov. 15, 2019.

A public meeting will be held Oct. 9 at 5:30 p.m. at the Richland Public Library, 955 Northgate Drive, Richland, Washington 99352. If you are unable to attend in person, you can participate via webinar, ID# 541-189-227.

Copies of the proposed modification and supporting documentation will be available online during the comment period at Hanford Administrative Record, on Ecology’s website, and at the Hanford Public Information Repositories. Please see the attached summary fact sheet.

Please submit any comments by Nov. 15, electronically (preferred) or by mail to:

Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Questions? Please contact Jennifer Colborn, MSA, at Jennifer_M_Colborn@rl.gov, or Daina McFadden, Ecology, at Hanford@ecy.wa.gov.

To request disability accommodation, please contact Jennifer Colborn, jennifer_m_colborn@rl.gov, 509-376-5840 at least 10 working days prior to the event. DOE makes every effort to honor disability accommodation requests.
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This is a message from the U.S. Department of Energy

Public Comment Period on Proposed Changes to the Hanford Dangerous Waste Permit

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The comment period is from Sept. 16 to Nov. 15, 2019.

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Copies of the proposed modification and supporting documentation are available online at Hanford Administrative Record, on Ecology’s website, and at the Hanford Public Information Repositories.

Please submit any comments by Nov. 15, electronically (preferred) or by mail to:

Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Questions? Please contact Jennifer Colborn, MSA, at Jennifer_M_Colborn@rl.gov, or Daina McFadden, Ecology, at Hanford@ecy.wa.gov.
Visit us on the [web](#) and follow our [news and social media](#).

[Subscribe](#) or [Unsubscribe](#)
Today marks the start of a new 60-day #public comment period held by @HanfordSite/@RiverProtection. This one involves the Effluent Management Facility at the Waste Treatment Plant and a few other facilities. Check out more here: ecology.wa.gov/Waste-Toxics/... @EcologyWA @EPAnorthwest