Response to Comments
Perma-fix Northwest Richland, Inc.
Evaporation System Permit Modification
August 31 through October 31, 2014

Summary of a public comment period and responses to comments

July 2015
Publication no. 15-05-009
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Response to Comments

Perma-fix Northwest Richland, Inc.
Evaporation System Permit Modification
August 31 through October 31, 2014

Department of Ecology
Nuclear Waste Program
3100 Port of Benton Boulevard
Richland, Washington 99354
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The Washington State Department of Ecology’s Nuclear Waste Program (NWP) 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, NWP 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.)

The Response to Comments is the last step before issuing the final permit, and its 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.
- List and respond to all significant comments received during the public comment period and any related public hearings.

This Response to Comments is prepared for:

Comment period: Perma-Fix Northwest Richland, Inc.
Evaporation System Permit Modification Request 135

Permit: Permit for the Storage and Treatment of Mixed Waste and Mixed Toxic Substances Control Act (TSCA) Polychlorinated Biphenyl (PCB, Wastes Identification Number: WAR 00001 0355

Permittee Perma-Fix Northwest Richland, Inc.

Original issuance date: May 28, 1999

Draft effective date: This permit modification is being withdrawn.

To see more information related to the Hanford Site and nuclear waste in Washington, please visit our website: www.ecy.wa.gov/programs/nwp.

BACKGROUND ON PROPOSED PERMIT MODIFICATION

Perma-Fix Northwest Richland, Inc. (PFNW) proposed a Class 3 permit modification to add an evaporation system to its mixed waste facility RCRA/TSCA permit in Richland. WAC 173-303-830, Appendix I, describes permit changes and how the class is determined.

The PFNW facility is located on 35 acres next to the U.S. Department of Energy’s Hanford Site. This facility manages and treats both low-level and mixed low-level radioactive wastes. (Mixed wastes are both radioactive and chemically hazardous.)

PFNW proposed to install the evaporation system in the Mixed Waste Thermal Building (formerly known as the GasVit Building) at the mixed waste facility. The evaporation system was proposed as regulated to the miscellaneous unit standards. PFNW requested that five
10,000-gallon tanks be permitted with the system and be regulated under the tank standards
under WAC 173-303 Dangerous Waste Regulations.

The system would treat waste by boiling off the water and capturing the contaminants. The boiled
off water is then condensed. The contaminants are then stabilized and returned to Hanford for
disposal.

The proposed permit modification included changes for the permit, attachments, and drawings that
were approved and stamped by a Washington-registered professional engineer.

**Proposed Permit Modification Withdrawn**

After submitting the draft permit for public comment, the permittee decided to rescind the permit
modification. Because PFNW withdrew the request, Ecology will not review it further or modify
the permit to add the evaporation system.

**PUBLIC INVOLVEMENT ACTIONS**

PFNW invited the public to comment on this Class 3 permit change during a 60-day public
comment period held August 31 through October 31, 2014.

Under WAC 173-303-830(4)(c), the permittee is responsible for holding the comment period and
a public meeting when it proposes a Class 3 modification. To meet these requirements, PFNW:

- Mailed a public notice announcing the comment period to the 170 persons on the postal
  mail part of the facility mail list.
- Mailed a second notice to the same list because the first letter did not have any mention
  of the public meeting.
- Placed an advertisement in the Tri-City herald on August 31, 2014.
- Emailed the public notice to the 233 persons on the email part of the facility mail list.
- Held a public meeting on September 24, 2014, at the Richland Public Library. Several
  members of the public attended but none submitted formal comments.

NWP also encouraged public comment by:

- Hosting the comment period review materials and meeting presentation on our comment
  periods website.
- Announcing the public meeting on our @ecyhanford Twitter account.
- Posting the comment period and the Tri-City Herald’s article on the proposal on our
  HanfordEducation Facebook page.

The following materials were available for public review during the comment period at the
Richland Public Library and the NWP Resource Center:

- Public notice.
- Transmittal letter.
- Draft PFNW Class 3 Permit Modification to install the Evaporation System.
The following public notices for this comment period are in Appendix A of this document:

1. First and second public notices (original and corrected).
2. Classified advertisement in the *Tri-City Herald*.
3. Public notice sent to the email list.
4. Event posted on Ecology Hanford Education & Outreach Facebook page (twice).
5. Public meeting notice sent to NWP’s @ecyhanford Twitter followers.
6. Tweet about ongoing comment periods.
7. Presentation shown at the meeting.

**LIST OF COMMENTERS**

**Commenter Identification:**

The table below lists the names of organizations or individuals who submitted a comment on the Perma-Fix Permit modification and where you can find Ecology’s response to the comment(s).

<table>
<thead>
<tr>
<th>Commenter</th>
<th>Organization</th>
<th>Comment Number</th>
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<td>Jean Vanni</td>
<td>Yakama Indian Nation</td>
<td>1</td>
<td>3, 4</td>
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<tr>
<td>Bill Collins</td>
<td>Public Citizen</td>
<td>2</td>
<td>4</td>
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</tbody>
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**RESPONSE TO COMMENTS**

**Description of Comments:**

NWP accepted comments on the Perma-Fix Evaporation System in the Mixed Waste Thermal Building PMR 135 - Permitting of Evaporation System (TP-16) from August 31 through October 31, 2015.

This section provides summary of comments that we received during the public comment period and our responses, as required by RCW 34.05.325(6)(a)(iii). The NWP’s responses directly follow each comment in italic font. Verbatim copies of all written comments are attached in Appendix B.

**Comment #1 from Jean Vanni, Yakama Nation, dated September 24, 2014**

Some of my concerns is the lack of information regarding the plant operation and its process and the design and the equipment and the types of waste streams to be allowed, their disposal, and how Ecology is going to maintain the permit in context/integration with the Hanford site's permit; and what types of permit modification process is going to be used?

Also, why would DOE agree to have a different facility than ETF process these waste streams? And does this new facility impact the ETF facility campaigns and scheduling of the 242 A. Evaporator campaigns?
Ecology Response:

Thank you for your comment. Ecology shares your concern about the lack of detail that was provided with this permit application. Ecology provided a Notice of Incompleteness letter to Perma-Fix in response to this modification on December 8, 2014 (letter number 14-NWP-244).

Perma-Fix decided to rescind the permit modification on April 3, 2015 (letter number 2015-LTR-1005). Because this modification was rescinded, there will be no further review and a permit modification will not be issued for the addition of the evaporator at Perma-Fix.

Comment #2 from Bill Collins, member of the public, dated September 25, 2014

What happened to reducing the Hanford footprint and keeping contamination onsite? This is a business deal to benefit a handful of folks who must have cut prosperous arrangement with DOE. There is no reason to bring waste into the city limits. If they want to build something install it out in the Central Plateau (200 AREAS). The only reason they are shipping waste off site is to push the work to cheaper labor. It has nothing to do with safety or what is best for our City. The City probably wants the tax money. This is contradictory to everything we are trying to do at Hanford. Shrink the footprint, not expand it.

Ecology Response:

Thank you for your comment. Ecology provided a Notice of Incompleteness letter to Perma-Fix in response to this modification on December 8, 2014 (letter number 14-NWP-244).

Perma-Fix decided to rescind the permit modification on April 3, 2015 (letter number 2015-LTR-1005). Because this modification was rescinded, there will be no further review and a permit modification will not be issued for the addition of an evaporator at Perma-Fix.
APPENDIX A: COPIES OF ALL PUBLIC NOTICES

1. First and second public notices (original and corrected).
2. Classified advertisement in the *Tri-City Herald*.
3. Public notice sent to the email list.
4. Event posted on Ecology Hanford Education & Outreach Facebook page (twice).
5. Public meeting notice sent to NWP’s @ecyhanford Twitter followers.
6. Tweet about ongoing comment periods.
7. Presentation shown at the meeting.
Dear Interested Person,

This letter serves as notice that Perma-Fix Northwest Richland, Inc. (PFNW-R) located at 2025 Battelle Boulevard in Richland, WA has submitted a Class 3 Permit Modification Request (PMR) to the Washington Department of Ecology (Ecology) to install a new treatment process. Pursuant to WAC 173-303-830(4)(c)(ii), PFNW-R is mailing (or emailing) this notice to all parties who have requested that they be notified of modifications to the facility’s RCRA/TSCA Mixed Waste permit and is on the facility mailing or email contact list.

PFNW-R has submitted a Class 3 PMR to install an evaporation system for liquid mixed wastes at its Richland facility. This permit change provides the necessary documentation to allow Ecology to approve the PMR in order for PFNW-R to safely and environmentally-compliantly treat mixed waste. The evaporation system will include five (5) storage tanks, two evaporators, and ancillary equipment. The evaporation system will be contained inside its Mixed Waste Facility (MWF). The MWF contains adequate secondary containment that will contain 110% of its largest tank. The PMR includes the proposed changes to the existing RCRA/TSCA permit and subsequent attachments. The permittee’s compliance history during the life of the permit being modified is available from the Department of Ecology contact person.

A copy of the Class 3 PMR is available to the public at the Richland Public Library. In addition, the permit modification can be viewed on Ecology’s website, www.ecy.wa.gov/programs/nwp/commentperiods.htm. The public comment period starts August 31st and goes through October 31, 2014. If you have any questions or comments on the permit changes, please contact Stephanie Schleif with Ecology at (800) 321-2008 or at NWP@ecy.wa.gov. Questions or comments may also be faxed to (509) 372-7971.

If you no longer wish to receive these notices or would prefer to receive these notices via email, contact Madeleine Brown with Ecology at (800) 372-7936.

Sincerely,

Richard Grondin
Vice President and General Manager
Perma-Fix Northwest-Richland, Inc.
Richard Grondin  
Vice President/General Manager  
Perma-Fix Northwest – Richland, Inc.  
2025 Battelle Blvd.  
Richland, WA 99354

RE: Class 3 Permit Modification, dated Aug. 27, 2014  
Public Meeting Notice Added

Dear Interested Person,

This letter serves as notice that Perma-Fix Northwest Richland, Inc. (PFNW-R) located at 2025 Battelle Boulevard in Richland, WA has submitted a Class 3 Permit Modification Request (PMR) to the Washington Department of Ecology (Ecology) to install a new treatment process. Pursuant to WAC 173-303-830(4)(c)(ii), PFNW-R is mailing (or emailing) this notice to all parties who have requested that they be notified of modifications to the facility’s RCRA/TSCA Mixed Waste permit and is on the facility mailing or email contact list.

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A copy of the Class 3 PMR is available to the public at the Richland Public Library. In addition, the permit modification can be viewed on Ecology’s website, www.ecy.wa.gov/programs/nwp/commentperiods.htm. The public comment period starts August 31st and goes through October 31, 2014. A public meeting has been scheduled for 5:00pm on September 24, 2014 at the Richland Public Library. If you have any questions or comments on the permit changes, please contact Stephanie Schleif with Ecology at (800) 321-2008 or at NWP@ecy.wa.gov. Questions or comments may also be faxed to (509) 372-7971.

If you no longer wish to receive these notices or would prefer to receive these notices via email, contact Madeleine Brown with Ecology at (800) 372-7936.

Sincerely,

Richard Grondin  
Vice President and General Manager  
Perma-Fix Northwest-Richland, Inc.
NOTICE OF INTENT TO REJECT SEALS OF PROPOSAL BIDS

The City of Kennewick, project sponsor, hereby gives notice to the Alexandria Manufacturing, Inc. for Final Plan Drawing, 11/18/2014, as previously submitted and rejected by the City of Kennewick for the Public Works Project No. 3922 (West Lake Road Storm Water Drainage Project). The City of Kennewick reserves the right to reject any and all bids and to cancel this bid period at any time.

The bid period is currently scheduled to end on September 9, 2014.

In accordance with the Revised Code of Washington State, any person or firm who falsifies a bid or submits a bid based on a false prequalification status is subject to a civil penalty, imprisonment, or both.

Any person or firm that submits a bid based on a false prequalification status shall be liable for a civil penalty of up to $10,000 for each violation.

Any person or firm that falsifies a bid or submits a bid based on a false prequalification status shall be subject to imprisonment for up to 5 years.

Any person or firm that falsifies a bid or submits a bid based on a false prequalification status shall be subject to a fine of up to $10,000 for each violation.

Any person or firm that falsifies a bid or submits a bid based on a false prequalification status shall be subject to imprisonment for up to 5 years.

Any person or firm that falsifies a bid or submits a bid based on a false prequalification status shall be subject to a fine of up to $10,000 for each violation.
This serves as notice that PFNW has submitted a Class 3 Permit Modification to the Washington Department of Ecology to install a new treatment process.

To unsubscribe from the ECY-COMMERCIAL-MIXED-RAD-WASTE list, click the following link: [http://listserv.wa.gov/cgi-bin/wa?SUBED1=ECY-COMMERCIAL-MIXED-RAD-WASTE&A=1](http://listserv.wa.gov/cgi-bin/wa?SUBED1=ECY-COMMERCIAL-MIXED-RAD-WASTE&A=1)
COMMENT PERIOD UNDERWAY! Perma-Fix Northwest is proposing a change to its mixed waste permit to allow installation of an evaporation system in one of the facility's buildings. The comment period runs through October 31 with a public meeting... See More

NWP Public Comment Periods
www.ecy.wa.gov

For more information on any of the comment periods, email hanford@ece.wa.gov or call the Hanford Cleanup line at 800-321-2008.
Should Perma-Fix add an evaporation system to treat some Hanford Site waste streams? Come share your thoughts at a public meeting at 5 p.m. Wednesday (9/24) at the Richland Library.

The comment period on this proposed permit modification runs through Oct. 31. See our comment period page for more information.
http://www.ecy.wa.gov/programs/nwp/commentperiods.htm
Dieter Bohrmann @ecyhanford · Sep 23

Should Perma-Fix add evaporator to treat some @HanfordSite waste?
Share your thoughts at mtg 5pm 9/24 @RichlandLib bit.ly/1rmhogZ
A Nuclear Services and Waste Management Company

PUBLIC MEETING FOR CLASS 3 PERMIT MODIFICATION:
EVAPORATION SYSTEM
Class 3 Permit Modification to Install Evaporation System

• PermaFix location
• Business/operations
• Current permit
• Need for permit modification
• Process Flow Diagram
• Photos
Perma-Fix Northwest Facility

- Acquired from PECOS in June 2007
- 42 acres located on Battelle Blvd
- 53 Employees
- RCRA Permit issued by WDOE and EPA (EPA ID WAR000010355)
- 2 Radioactive Material Licenses issued by WDOH
- Air Permits from WDOH and BCAA
Current Status RCRA/TSCA Permit

- RCRA Permit issued: May 28, 1999
- Permit expiration: July 7, 2009
- Renewal application submitted: April 2009
- Currently operating under old permit
- PMR submitted on Aug. 29, 2014
- Public comment period is Aug. 31-Oct. 31
- Notice mailed to Interested Parties
Need for Permit Modification

• Business needs to expand treatment capabilities for mixed wastes
• Install a new process to evaporate water contaminated with RCRA constituents (mixed wastes)
• Further processes will be used to stabilize residue from the evaporators
Details of Permit Modification

• Addition of Evaporation System (TP-16)
  – Increase tank storage capacity
  – Install evaporators
  – Ability to accept mixed wastes in tanker trucks
• Removal of Gasification/Vitrification System
• Clarify related language to align with current practices
• Correct typos
Process Flow Diagram

- **Incoming Waste**
  - Liquid and minimal amounts of solids in tanker or containers

- **Mixed Waste Facility**
  - Evaporation system proposed to evaporate mixed waste water with less than 10% VOC’s
  - EPA Waste Codes: D004, D005, D007-D011, F001-F005, F039, and U210
  - Storage tanks and processed in evaporators

- **Evaporation Stabilization**

- **Storage Disposal**
Evaporator Unit Info.

1. Two units with capacity of 260 gallons per hour each.
2. Unit dimensions: 13’ x 7’ x 10’
3. Stainless steel
4. Natural gas
5. Approx. volume reduction 95%
Air Emissions

Estimated Volatile Organic Compounds (VOC) from Evaporation System Based on Hanford Waste:

• Potential emissions – 4.94 tons VOC per year
• Actual emissions – 0.76 tons VOC per year

(BCAA): Class 1 Source Facility

• Approx. 80% of being Class 2 Source (>8tpy)
• Approx. 95% of Title V Operation Limits (>100tpy)
Next steps

• Submit Modification to WDOH for Air Permit
• Submit Source Review (NOC) to BCAA
• Submit Radioactive Material License amendment to include the units
• Response to WDOE Notice of Deficiencies (NOD)
Perma-Fix Northwest Contact Information

Richard Grondin
Vice President & General Manager
2025 Battelle Blvd, Richland WA 99354
Email: rgrondin@perma-fix.com
Tel: (509) 375-7026
Permit Information

• Copy of the permit modification is available at:
  – Richland Public Library
  – Washington Dept. of Ecology
WDOE Contact

• Stephanie Schleif
  – Phone: 1 (800) 321-2008
  – Email: NWP@ecy.wa.gov
Questions
APPENDIX B: COPIES OF ALL WRITTEN COMMENTS
From: Jean Vanni <JVanni@ynerwm.com>
Sent: Wednesday, September 24, 2014 4:00 PM
To: Schleif, Stephanie (ECY)
Cc: Dahl, Suzanne (ECY); Jean Vanni; gerry p (gerry@hoanw.org)
Subject: RE: perma fix mods

Stephanie, that would be great. I think there’s a public meeting tonight at the Library and I hope to attend. If someone could address the following, I won't have to ask these questions later. Thank you, Jean

Some of my concerns is the lack of information regarding the plant operation and its process and the design and the equipment and the types of waste streams to be allowed, their disposal, and how Ecology is going to maintain the permit in context/integration with the Hanford site's permit; and what types of permit modification process is going to be used?

Also, why would DOE agree to have a different facility than ETF process these waste streams? And does this new facility impact the ETF facility campaigns and scheduling of the 242 A Evaporator campaigns?

From: Schleif, Stephanie (ECY) [ssch461@ECY.WA.GOV]
Sent: Wednesday, September 24, 2014 10:49 AM
To: Jean Vanni
Cc: Dahl, Suzanne (ECY)
Subject: RE: perma fix mods

Hi Jean,

Would tomorrow morning at 11am work for you to meet? We have reserved a room here at Ecology for the discussion.

Thanks,

Stephanie Schleif
Office: 509-372-7929
Nuclear Waste Program
WA State Department of Ecology

From: Jean Vanni [mailto:JVanni@ynerwm.com]
Sent: Tuesday, September 23, 2014 1:35 PM
To: Schleif, Stephanie (ECY)
Cc: Dahl, Suzanne (ECY); Jean Vanni
Subject: perma fix mods

Hello Stephanie, I would like to meet with you to discuss the Perma-Fix permit modifications. I’m available the rest of the week except for Thursday afternoon. Let me know when you & possibly Suzanne could spare 20-30 minutes. Thank you, Jean
Hi,

What happened to reducing the Hanford foot print and keeping contamination onsite? This is a business deal to benefit a handful of folks who must have cut prosperous arrangement with DOE. There is no reason to bring waste into the city limits. If they want to build something install it out in the Central Plateau (200 AREAS). The only reason they are shipping waste off site is to push the work to cheaper labor. It has nothing to do with safety or what is best for our City. The City probably wants the tax money. This is contradictory to everything we are trying to do at Hanford. Shrink the foot print, not expand it.

Thanks, Bill Collins  
Richland, Washington  
509 539-2169