



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

## **Response to Comments**

### **Adding Capacity to Hanford's 325 Hazardous Waste Treatment Units**

**March 2 – April 17, 2015**

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*Summary of a public comment period and responses to comments*

July 2015

Publication no. 15-05-011

## **PUBLICATION AND CONTACT INFORMATION**

This publication is available on the Department of Ecology's (Ecology) website at <https://fortress.wa.gov/ecy/publications/SummaryPages/1505011.html>

For more information contact:

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Nuclear Waste Program  
3100 Port of Benton Boulevard  
Richland, WA 99354

Phone: 509-372-7950  
Hanford Cleanup Line: 800-321-2008  
Email: [Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov)

Washington State Department of Ecology - [www.ecy.wa.gov](http://www.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

Ecology publishes this document to meet the requirements of [Washington Administrative Code 173-303-840 \(9\)](#).

*To request ADA accommodation including materials in a format for the visually impaired, call Ecology at 509-372-7950. Persons with impaired hearing may call Washington Relay Service at 711. Persons with speech disability may call TTY at 877-833-6341.*

# **Response to Comments**

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## **Adding Capacity to Hanford's 325 Hazardous Waste Treatment Units March 2 – April 17, 2015**

Department of Ecology  
Nuclear Waste Program  
3100 Port of Benton Boulevard  
Richland, Washington 99354

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## INTRODUCTION

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: *Adding Capacity to Hanford's 325 Hazardous Waste Treatment Units, March 2 – April 17, 2015*

Permit: *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Part II, Operating Group Unit Group 5, (WA7890008967), 325 Hazardous Waste Treatment Units*

Permittees: *United States Department of Energy – Richland Operations Office  
Pacific Northwest National Laboratory*

Original issuance date: *February 28, 1998*

Draft effective date: *July 31, 2015*

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

## REASONS FOR ISSUING THE PERMIT

The United States Department of Energy - Richland Operations Office and Pacific Northwest National Laboratory (Permittees) proposed a Class 3 permit modification to add three new areas to the Radiochemical Processing Laboratory where permitted storage and treatment of waste can occur. The three new areas are:

1. Cask-handling area
2. Truck lock
3. 3714 Pad (for storage)

The Permittees requested to add the three areas to enable the treatment of waste. The currently permitted areas are not large enough to properly process the existing waste streams.

Because this is a Class 3 modification, two public comment periods were required. The Permittees were responsible to hold the first comment period on their permit modification request. That comment period ran August 18 – October 17, 2014.

The Nuclear Waste Program was responsible to hold a comment period on our draft permit modification. We held that comment period from March 2 through April 17, 2015. (See “Public Involvement Actions” section for details.)

## **PUBLIC INVOLVEMENT ACTIONS**

NWP encouraged public comment on the draft permit modification *Adding Capacity to Hanford's 325 Hazardous Waste Treatment Units* during a 45-day public comment period held March 2 through April 17, 2015.

NWP took the following steps to notify and involve the public:

- Mailed a public notice announcing the comment period to 1,904 interested members of the public.
- Placed a public announcement legal classified advertisement in the *Tri-City Herald* on Sunday, March 1, 2015.
- Sent a notice announcing the start of the comment period to the [Hanford-Info email list](#), which then had 1,425 recipients.
- Sent an advance notice of the comment period start to the Hanford-Info email list.
- Included the comment period on a calendar of public involvement events hosted on our website.
- Discussed the comment period with Hanford stakeholders at a meeting on April 7, 2015.
- Posted the comment period as an event on Ecology's [Hanford Education & Outreach Facebook page](#).
- Placed copies of the public notice in the lobby of Ecology's Nuclear Waste Program.
- Announced the comment period on KTCV (88.1) Radio Station.

The documents listed below were available for review at the [Hanford information repositories](#) located in Richland, Spokane, and Seattle, Washington, and Portland, Oregon. The documents are also available on [NWP's public comment periods webpage](#).

- Comment period summary
- Transmittal letter
- Draft Permit Modification for the 325 Hazardous Waste Treatment Units
- State Environmental Policy Act (SEPA) Determination of Nonsignificance
- Response to Comments for the Permittees comment period, which ran from August 18 through October 17, 2014.

The following public notices for this comment period are in [Appendix A](#) of this document:

1. Comment period summary
2. Classified advertisement in the *Tri-City Herald*
3. Notices sent to the Hanford-Info email list
4. Event posted on Ecology Hanford Education & Outreach Facebook page
5. Script for radio public service announcement

## **RESPONSE TO COMMENTS**

NWP accepted comments on the “Adding Capacity to Hanford’s 325 Hazardous Waste Treatment Units” class 3 permit modification from March 2 through April 17, 2015. One individual, Bill Johns, submitted a comment. Verbatim copies of all written comments are attached in [Appendix B](#) and below.

### **Bill Johns, Email dated 3/22/2015:**

I support the changes to the Dangerous waste permit adding 3 new areas to the 325 Hazardous Waste Treatment Units in the 300 area.

### ***Ecology Response:***

*Thank you for your comment.*

## **APPENDIX A: COPIES OF ALL PUBLIC NOTICES**

Public notices for this comment period:

1. Public notice
2. Classified advertisement in the *Tri-City Herald*
3. Notices sent to the Hanford-Info email list
4. Event posted on Ecology Hanford Education & Outreach Facebook page
5. Script for radio public service announcement.

# Adding Capacity to Hanford's 325 Hazardous Waste Treatment Units

Washington's Department of Ecology invites you to comment on a proposed change to Hanford's dangerous waste permit.

The 325 Hazardous Waste Treatment Units (HWTU) are owned and operated by the United States Department of Energy and co-operated by Pacific Northwest National Laboratory (permittees).

The permittees submitted a Temporary Authorization request to allow work to proceed before the permit approval. Ecology approved that request on September 3, 2014. The permittees held a 60-day comment period on the proposal from August 18 to October 17, 2014.

## Proposed Changes

The permit change will add three new units to the 325 HWTUs as areas where waste can be stored and treated.

## Cask Handling Area

This is a portion of Room 603 and 604A in the Radiochemical Processing Laboratory. This area has a heavier floor loading limit and a large capacity bridge crane. This unit would be used to load heavy waste containers in larger containers or boxes and temporarily store these larger containers prior to treatment.

## Truck Lock

This area has a strong floor and a large roll-up door and truck ramp. This area can be used to fill heavy containers or boxes with grout and store them.

## 3714 Pad

This is a concrete foundation for a building that was torn down recently. This pad, and the ground near it, can be used to stage boxes and containers for shipment.

## View the Full Proposal

This document is a summary of the proposed 325 HWTU Permit changes. The full proposal is available beginning March 2, 2015, on Ecology's Nuclear Waste Program website [www.ecy.wa.gov/programs/nwp/commentperiods.htm](http://www.ecy.wa.gov/programs/nwp/commentperiods.htm)

## PUBLIC COMMENT PERIOD

March 2 – April 17, 2015

## To Submit Comments

Please send comments by email (preferred), U.S. Mail, or hand deliver them to:

Stacy Nichols  
3100 Port of Benton Blvd.  
Richland, WA 99354  
[Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov)

## Public Hearing

A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To ask for a hearing or for more information, contact:

Stacy Nichols  
[Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov)  
509-372-7950

## Tips on Effective Commenting

<https://fortress.wa.gov/ecy/publications/publications/0307023.pdf>

## Accommodation Requests

To request ADA accommodation for disabilities, or printed materials in a format for the visually impaired, call Ecology at 509-372-7950.

Persons with impaired hearing may call Washington Relay Service at 711. Persons with speech disability may call TTY at 877-833-6341.





3100 Port of Benton Boulevard  
Richland, WA 99354

**Public Comment Period**

325 Hazardous Waste Units  
Permit Modification  
March 2, 2015

**Information Repositories and other document review locations**

**Online**

[www.ecy.wa.gov/programs/nwp/commentperiods.htm](http://www.ecy.wa.gov/programs/nwp/commentperiods.htm)

**Richland**

Ecology's Nuclear Waste Program Resource Center  
3100 Port of Benton Blvd.  
Richland, WA 99354

Contact: Valarie Peery 509-372-7950

[Valarie.Peery@ecy.wa.gov](mailto:Valarie.Peery@ecy.wa.gov)

Department of Energy Administrative Record  
2440 Stevens Drive, Room 1101

Richland, WA 99354

Contact: Heather Childers 509-376-2530

[Heather\\_M\\_Childers@rl.gov](mailto:Heather_M_Childers@rl.gov)

Department of Energy Reading Room  
2770 Crimson Way, Room 101L  
Richland, WA 99354

Contact: Janice Scarano 509-372-7443

[DOE.reading.room@pnnl.gov](mailto:DOE.reading.room@pnnl.gov)

**Portland**

Portland State University  
Branford Price Millar Library  
1875 SW Park Avenue  
Portland, OR 97207

Contact: Claudia Weston 503-725-4542

[Westonc@pdx.edu](mailto:Westonc@pdx.edu)

**Seattle**

University of Washington Suzzallo Library  
PO Box 352900  
Seattle, WA 98195

Contact: Cass Hartnett 206-685-6110

[Hartnettc@uw.edu](mailto:Hartnettc@uw.edu)

**Spokane**

Gonzaga University Foley Center  
502 E. Boone Avenue  
Spokane, WA 99258

Contact: John Spencer 509-313-6110

[spencer@gonzaga.edu](mailto:spencer@gonzaga.edu)

# Classified Legals

## Public comment period

Washington's Department of Ecology invites you to comment on a proposed change to Hanford's dangerous waste permit. The change will add capacity to Hanford's 325 Hazardous Waste Treatment Units (HWTUs).

The public comment period starts March 2 and runs through April 17. A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To ask for a hearing or for more information, contact: Stacy Nichols, Hanford@ecy.wa.gov, or 509-372-7950.

The 325 Hazardous Waste Treatment Units (HWTU) are owned and operated by the United States Department of Energy and co-operated by Pacific Northwest National Laboratory (permittees).

The permittees submitted a Temporary Authorization request to allow work to proceed before the permit approval. Ecology approved that request on September 3, 2014. The permittees held a 60-day comment period on the proposal from August 18 to October 17, 2014.

The permit change will add three new units to the 325 HWTUs as areas where

waste can be stored and treated

**Cask Handling Area** - This is a portion of Room 603 and 604A in the Radiochemical Processing Laboratory. This area has a heavier floor loading limit and a large capacity bridge crane. This unit would be used to load heavy waste containers in larger containers or boxes and temporarily store these larger containers prior to treatment.

**Truck Lock** - This area has a strong floor and a large roll-up door and truck ramp. This area can be used to fill heavy containers or boxes with grout and store them.

**3714 Pad** - This is a concrete foundation for a building that was torn down recently. This pad, and the ground near it, can be used to stage boxes and containers for shipment.

To submit comments, send them by email (preferred) to hanford@ecy.wa.gov. Or use US Mail, or hand deliver them to Stacy Nichols, 3100 Port of Benton Blvd, Richland, WA 99354.

You can review the proposed changes and supporting information at Ecology's Nuclear Waste Program website [www.ecy.wa.gov/programs/nwp/commentperiods.htm](http://www.ecy.wa.gov/programs/nwp/commentperiods.htm).

The proposal and supporting info are also at the four Hanford Public Information Repositories and two other locations in Richland:

### Richland

Ecology's Nuclear Waste Program Resource Center  
3100 Port of Benton Blvd.  
Richland, WA 99354  
Contact: Valarie Peery  
509-372-7950  
Valarie.Peery@ecy.wa.gov

Department of Energy  
Administrative Record  
2440 Stevens Drive,  
Room 1101  
Richland, WA 99354  
Contact: Heather Childers  
509-376-2530  
Heather\_M\_Childers@rl.gov

Department of Energy  
Reading Room  
2770 Crimson Way,  
Room 101L  
Richland, WA 99354  
Contact: Janice Scarano  
509-372-7443  
DOE.  
reading.room@pnnl.gov

### Portland

Portland State University  
Branford Price Millar Library  
1875 SW Park Avenue  
Portland, OR 97207  
Contact: Claudia Weston  
503-725-4542  
Westonc@pdx.edu

### Seattle

University of Washington  
Suzzallo Library  
PO Box 352900  
Seattle, WA 98195  
Contact: Cass Hartnett  
206-685-6110  
Hartnettc@uw.edu

### Spokane

Gonzaga University  
Foley Center  
502 E. Boone Avenue  
Spokane, WA 99258  
Contact: John Spencer  
509-313-6110  
spencer@gonzaga.edu

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Persons with impaired hearing may call Washington Relay Service at 711. Persons with speech disability may call TTY at 877-833-6341.

#15-8370 3/1/2015

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**From:** Brown, Madeleine (ECY)  
**Sent:** Friday, December 12, 2014 2:23 PM  
**To:** hanford-Info@listserv.wa.gov  
**Subject:** Advance Notice - Public comment period to add capacity to the 325 Hazardous Waste Treatment Units

This is a message from the Washington Department of Ecology (Ecology).

Ecology will hold a public comment period starting in early February 2015 on a modification to Hanford's dangerous waste permit. The change will add three new units to [325 Hazardous Waste Treatment Units \(HWTUs\)](#) as permitted areas for storage and treatment of waste.

The 325 HWTUs are owned and operated by the U.S. Department of Energy and co-operated by Pacific Northwest National Laboratory (permittees). The additional space is needed so the permittees have room to put small containers of waste into very large containers of grout.

This is a Class 3 modification, which requires two public comment periods. The permittees held a 60-day comment period on the proposed permit that ran August 18 –October 17, 2014. They also held the required public meeting on September 4, 2014. The second comment period is a 45-day public comment period and it be for the draft permit that Ecology is submitting for public comment. We expect the 45-day public comment period will begin in early February 2015.

Located in Hanford's 300 Area, this unit of Hanford's dangerous waste permit consists of six rooms in the 325 Building. The unit stores and treats a variety of small volumes of dangerous chemical and mixed chemical and radioactive wastes from lab operations in the 300 Area.

These new units are needed to enable the treatment of waste by placing waste containers in large boxes and filling them with grout. This treatment is sometimes required by Hanford's waste acceptance criteria for burial or Washington's dangerous waste regulations. The change would add three units to the 325 HWTUs:

- **Cask Handling Area:** A portion of Room 603 and 604A in the Radiochemical Processing Laboratory. This area has a heavier floor loading limit and a large capacity bridge crane. This unit would be used to load heavy waste containers in larger containers or boxes and temporarily store these larger containers.
- **Truck Lock:** Room 610 in the Radiochemical Processing Laboratory, next to Room 603. This area is built on grade with heavy concrete. It has a large roll-up door and truck ramp. The permittees would use the Truck Lock when filling heavy containers or boxes with grout and for storing those containers. The Truck Lock can also pre-stage shipments of waste containers for onsite disposal.
- **3714 Pad:** This is the concrete foundation pad for the 3714 Building, which was demolished in 2000. The permittees want to use this pad and adjacent ground to stage waste boxes and containers for shipment. This allows the waste to be out of laboratory operational areas while awaiting shipment. It also makes inspections easier.

The permittees also submitted a Temporary Authorization request to allow work to proceed before the permit approval. Ecology approved that request on September 3, 2014.

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**From:** Brown, Madeleine (ECY)  
**Sent:** Monday, March 02, 2015 2:27 PM  
**To:** hanford-Info@listserv.wa.gov  
**Subject:** Comment period starts today!

Washington's Department of Ecology invites you to comment on a proposed change to Hanford's dangerous waste permit.

**The comment period runs March 2 through April 17, 2015.**

The change is to add three new areas to the [325 Hazardous Waste Treatment Units](#) (HWTUs) in Hanford's 300 Area. The new space is needed so there's room to put small containers of waste into very large containers of grout.

The 325 HWTUs are owned and operated by the U.S. Department of Energy and co-operated by Pacific Northwest National Laboratory (permittees).

**Proposed Changes**

The permit change will add three new units to the 325 HWTUs as areas where waste can be stored and treated:

- **Cask Handling Area** - This is a portion of Room 603 and 604A in the Radiochemical Processing Laboratory. This area has a heavier floor loading limit and a large capacity bridge crane. This unit would be used to load heavy waste containers in larger containers or boxes and temporarily store these larger containers.
- **Truck Lock** - This area is has a strong floor and a large roll-up door and truck ramp. This area can be used to fill heavy containers or boxes with grout, and store them.
- **3714 Pad** - This is concrete foundation for a building that was torn down recently. This pad, and the ground near it, can be used to stage boxes and containers for shipment.

The permittees submitted a Temporary Authorization request to allow work to proceed before the permit approval. Ecology approved that request on September 3, 2014. The permittees held a 60-day comment period on the proposal from August 18 to October 17, 2014.

A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To ask for a hearing or for more information, contact:

Madeleine Brown  
509-372-7950  
[Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov)

Please send comments by email (preferred), U.S. Mail, or hand deliver them to:  
Stacy Nichols  
3100 Port of Benton Blvd.  
Richland, WA 99354

[Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov)

The proposal and supporting info are at the [Hanford Public Information Repositories](#).

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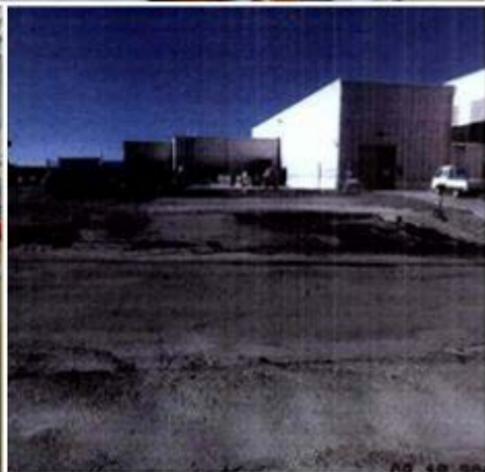
## Ecology's Hanford Education & Outreach Network

added 3 new photos.

Posted by Madeleine C. Brown [?] · March 2 · 🌐

Comment period starts today for changes to Hanford's permit to add capacity to the 325 Hazardous Waste Treatment Units. Comment period runs through April 17. Pix show the new areas - truck lock, cask loading room, and outdoor pad.

<http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>



48 people reached

Boost Post

*The Washington Department of Ecology invites you to comment on a proposed change to Hanford's dangerous waste permit. The comment period began March 2 and runs through April 17.*

*The change is to add three new areas to the [325 Hazardous Waste Treatment Units](#) in Hanford's 300 Area. The new space is needed so workers can put small containers of waste into very large containers. These larger containers can then be filled with grout as treatment.*

*This part of Hanford is owned and operated by the United States Department of Energy and Pacific Northwest National Laboratory.*

*To learn more about the permit change, visit Ecology's website at [ecy.wa.gov/programs/nwp](http://ecy.wa.gov/programs/nwp). Or call Ecology at 800-321-2008.*

## **APPENDIX B: COPIES OF ALL WRITTEN COMMENTS**

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**From:** Sue Johns <prayjohns@hotmail.com>  
**Sent:** Sunday, March 22, 2015 8:19 AM  
**To:** Hanford (ECY)  
**Subject:** Comment changes to the dangerous waste permit (Stacy)

I support the changes to the Dangerous waste permit adding 3 new areas to the 325 Hazardous Waste Treatment Units in the 300 area.

Bill Johns  
12608 S. Scribner Road  
Cheney, Washington 99004