Response to Comments
Hanford Dangerous Waste Permit – Attachment 3, Security
December 10, 2018 – February 11, 2019

Summary of a public comment period and responses to comments

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Response to Comments
Hanford Dangerous Waste Permit – Attachment 3, Security
December 10, 2018 – February 11, 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.)

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: Hanford Dangerous Waste Permit – Attachment 3, Security
December 10, 2018 – February 11, 2019


Permittee(s): The U.S. Department of Energy

Original issuance date: September 27, 1994
Draft effective date: April 12, 2019

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

Reasons for issuing the permit

The Hanford Dangerous Waste permit establishes requirements to ensure that waste management activities are protective of human health and the environment. A component of the requirements addresses security, which must prevent the unknowing entry, and minimize the possibility of unauthorized entry, onto the Hanford Site.

Due to the large size of the Hanford Site, security is addressed at the site level, as well as for individual treatment, storage, and disposal units. Permit Attachment 3, Security addresses the site level security requirements.
The changes to Attachment 3 include descriptions of warning signs and locations, barricades and perimeter fences, and personnel access control. Attachment 3 also includes photographs of the various types of signs used to prevent unknowing or unauthorized entry onto the Hanford Site.

**Public involvement actions**


The following actions were taken to notify the public:

- Mailed a public notice announcing the comment period to 1300 members of the public.
- Distributed copies of the public notice to members of the public at Hanford Advisory Board meetings.
- Placed a public announcement legal classified advertisement in the *Tri-City Herald* on December 10, 2018.
- Emailed a notice announcing the start of the comment period to the Hanford-Info email list, which has 1377 recipients.

The Permittee held a public meeting on January 16, 2019, at 5:30 p.m. at the Richland Public Library. 15 members of the public attended.

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

- Public notice
- Transmittal letter
- Draft Attachment 3, *Security* Permit Modification

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

- Public notice (focus sheet)
- Classified advertisement in the *Tri-City Herald*
- Notice sent to the Hanford-Info email list
List of Commenters

The table below lists the names of organizations or individuals who submitted a comment on the Permit Attachment 3, *Security* Permit modification. The comments and responses are in Attachment 1.

<table>
<thead>
<tr>
<th>Commenter</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jeanne Poirier</td>
<td>Citizen</td>
</tr>
<tr>
<td>Mike Conlan</td>
<td>Citizen</td>
</tr>
<tr>
<td>Ed Stock</td>
<td>Citizen</td>
</tr>
</tbody>
</table>
Attachment 1: Comments and responses

Description of comments:
Ecology accepted comments from December 10, 2018, through February 11, 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.
Letter I-1: Jeanne Poirier, 12/22/18 7:29 PM PT

Comment I-1-1

Thank you for allowing public comment on regulations, decisions at Hanford. Better, increased signage is good! You have a huge responsibility and nearly impossible goal to keep safe the nuclear waste at Hanford now and in the future.

Ecology Response to I-1-1

Thank you for your comment. Ecology is working very hard to improve the current Hanford permit.

Letter I-2: Mike Conlan, 12/30/18 4:37 PM PT

Comment I-2-1

Remove all nuclear waste,

Ecology Response to I-2-1

Thank you for your comment. Ecology is working to ensure long-term storage, treatment, and disposal of waste is protective of human health and the environment.

Comment I-2-2

Do not allow anymore nuclear waste into the facility,

Ecology Response to I-2-2

Thank you for your comment. The proposed permit changes are not to allow new waste, but to better manage the waste already at Hanford.

Comment I-2-3

Replace all the single storage tanks,

Ecology Response to I-2-3

Single-shell tanks are not in the scope of the Attachment 3 "Security" permit modification. Ecology does agree the tanks pose a threat. We believe a better approach to addressing it is to remove the waste from single-shell tanks and put it in the more compliant double-shell tanks to prepare for eventual treatment. The waste will be treated in the Waste Treatment and Immobilization Plant which is now being built.

Comment I-2-4

Stop all the nuclear leakage entering the Columbia River
**Ecology Response to I-2-4**

Thank you for your comment. Stopping any potential nuclear waste from impacting the Columbia river is not within the scope of the Attachment 3 "Security" permit modification. Prevention of surface water impacts is addressed by operations associated with other units at Hanford.

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**Letter I-3: Ed Stock, 1/07/19 5:23 AM PT**

**Comment I-3-1**

How will Security be enforced regarding Hanford's Dangerous Waste?

**Ecology Response to I-3-1**

Thank you for your comment, Security is enforced at Hanford through the use use of Hanford Patrol. These highly trained security personnel are present on site 24 hours a day, 7 days a week, including Holidays. The Benton County Sheriff’s Office also provides law enforcement support to the Hanford facility. The only people allowed on site must have a U.S. Department of Energy approved badge on display on their person. All Hanford personnel are trained to restrict access to unauthorized persons and to stop anyone who does not have an approved badge.

**Comment I-3-2**

What measures will be enforced to prevent acquisition of Hanford's Dangerous Waste?

**Ecology Response to I-3-2**

There are several different measures enforced to prevent acquisition of Hanford's Dangerous Waste. The main purpose of the security measures is to prevent the unknowing entry and minimize the possibility of unauthorized entry of persons onto the Hanford site. This is achieved through the use of signs that say "no trespassing" and warn of the dangers present. There are also other controls: 24-hour surveillance system, barriers such as facility fences (with and without barbed wire), locked gates and doors, and manned barricades at vehicular access roads.

**Comment I-3-3**

When will the Yucca Mountain facility be completed so that the shipment of the High Level Waste can be safely shipped off the Hanford reservation?

**Ecology Response to I-3-3**

Thank you for your comment. The Yucca Mountain facility is not in the scope of the Attachment 3 "Security" permit modification. Yucca Mountain is currently not authorized as a waste repository.
Appendix A: Copies of all public notices

Public notices for this comment period:

- Public notice (focus sheet)
- Classified advertisement in the *Tri-City Herald*
- Notice sent to the Hanford-Info email list
The U.S. Department of Energy Richland Operations Office is holding a 60-day public comment period from December 10, 2018, to February 11, 2019, for a Class 2 Permit Modification to the Hanford Dangerous Waste Permit. This modification proposes to update Attachment 3, Security.

Background
The Hanford Site occupies 580 square miles in southeastern Washington state. Beginning in 1943, the site was used to produce plutonium for World War II and the Cold War and continued operations until the late 1980s. The waste remaining from those operations is a potential risk to human health and the environment, including the Columbia River.

In 1989, DOE, EPA and Ecology entered into a legally binding accord, the Tri-Party Agreement (TPA), to clean up the Hanford Site. Today, waste management and environmental cleanup are the main missions at Hanford. DOE manages the cleanup effort under the oversight of the regulatory agencies, EPA and Ecology. The Site cleanup effort involves dangerous waste treatment, storage and disposal. These activities are performed in accordance with the Hanford Dangerous Waste Permit Revision 8C (WA7890008967).

Overview
The Hanford Dangerous Waste permit establishes requirements to ensure waste management activities are protective of human health and the environment. A component of the requirements addresses security.

The permit specifies security requirements at the Site level, as well as for individual treatment, storage and disposal units. The changes being proposed address Site level security requirements contained in Attachment 3. These changes include updated descriptions of warning signs, surveillance systems and barriers.

DOE is proposing a Class 2 permit modification pursuant to WAC 173-303-830(4)(d)(i). The proposed changes pertain to WAC 173-303-310 security requirements. The permittees’ compliance history during the life of the permit being modified is available through Ecology.
Class 2 Permit Modification Sequence
As per WAC 173-303-830, “Permit Changes,” this Class 2 Permit Modification will go through the required public review process that includes this fact sheet, newspaper advertisement and public meeting.

Summary of Changes to Attachment 3, Security
Attachment 3 was rewritten to describe Hanford Sitewide Security. Updates include:

- Description of signage, to include Site perimeter signs, Columbia River signs and unit group signs
- Description of the 24-hour surveillance system
- Description of barricades for access control to the 200 Area (Central Plateau)
- Description of perimeter and area fences to include 200 East, 200 West, 300 and 400 areas
- Description of the security personnel and personnel access control
- Photographs of DOE “No Trespassing” sign, Wye Barricade signage (typical for Rattlesnake and Yakima Barricades) and Columbia River signage
# How to get involved

A 60-day public comment period will run from December 10, 2018 to February 11, 2019. The public meeting is January 16, 2019, 5:30 p.m., Richland Public Library, 955 Northgate Dr., Richland, WA 99352.

To request disability accommodation, please contact Jennifer Colborn, jennifer_m_colborn@rl.gov, (509) 376-5840, in our external affairs office at least 10 working days prior to the event. DOE makes every effort to honor disability accommodation requests.

The DOE point of contact is Kristen Holmes, kristen.l.holmes@rl.doe.gov and (509) 376-3375. The Ecology point of contact is Randy Bradbury, randy.bradbury@ecy.wa.gov and (509) 372-7954.

Please submit comments on the proposed changes by February 11, 2019 via eComments to: [http://wt.ecology.commentinput.com/?id=9eAsZ](http://wt.ecology.commentinput.com/?id=9eAsZ) or mail to: Daina McFadden
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, WA 99354

Electronic access to the proposed permit modification and supporting documentation is available on the hanford.gov events calendar ([https://go.usa.gov/xP63M](https://go.usa.gov/xP63M)), and in the Administrative Record and Public Information Repositories.
Public Involvement Opportunity

We want to hear from you on the updates to Attachment 3 (Security) of the Hanford Dangerous Waste Permit.

Comment Period: December 10, 2018 to February 11, 2019
Public Meeting: January 16, 2019, 5:30 p.m., Richland Public Library
TRUMP

will complete a report of any findings it didn’t stop this massive compre- hensive, but rather decided to move on. The American people

be able to see it in the near future. Trump has previously

stressed a need to wait until the

his business arrangements with Russians and about possible obstruction of justice.

“The new Congress will not try to shield the presi-

dent,” he said. “We will try to get to the bottom of

malicious payments to porn actress Stormy Da-

model Karen McDougal, to whom the company had never paid.

The U.S. Department of Energy’s (DOE)

said that he accidentally hit Deputy Energy with it.

Experts said that “every-

thing went south” because the deputes were not patient in going him

enough time to comply.”

FROM PAGE 1A

VITALTAG

lab to build it with compo-

ents already available. This

June 2, the Department of

Engineering’s lab is operated by

Tietje.

The demonstration

director, McQueary said, a

person’s chest but they are

already working on the

second generation of the device, which is a

bandable but with ad-

hesives on the back that will

attach directly to the chest.

It’s a solution that arose from

students inброса.

Those students with two presure

systems being deployed at the

Boston Marathon in 2013.

“They needled some-

thing that would more
effectively process larger

numbers of people and to

keep an eye out for people

with a potential heart detec-

tion, or for people they

thought were in a bad

state, but who are stable,”

said.

Most ambulances carry
equipment that can do the

same things, but generally

only for one or two people at

a time, Tietje said.

The price and the size of

the new device makes it so

an ambulance or police

car could carry several of

them to attend to patients.

This would amplify how

much a single team could be

able to monitor during an

emergency, including

bus crashes on a rural

highway or a crush during a natural disaster.

The way Tietje imagines it,

the first person on the

scene would attach a Vi-

tatag to every patient.

That information would be

broadcast both to the

media on the scene, but

also to the hospital. It

could even provide a

map of where all of the

patients are located.

“If it’s dark and it’s

chaotic and confusing, I can

look at my phone and tell

it’s the person over there

on the southeast corner that

needs help,” he said.

The lab is working with

occupational medicine

company AmeraWorks to

confirm the equipment

works, said Sacrifices An-

期待るのruns the lab’s

healthcare clientele.

Information from those teams will help as the lab

finds a private company to take the project through

its remaining steps. Work on the device started about

a year and a half ago. The laboratory is shopping it around to

medical companies who will take it through the

remaining steps to bring it to the hands of first-

responder. This includes getting approved by the

Food and Drug Admin-

istration.

“The device is pretty far along and

it’s a testament to the team

that we are not only on track and

beyond the call of duty,” he said.

Contact DOE’s Kris Holm

s, kholmc@doe.gov, or

Ecology’s Randy Bradbury, Randy.Bradbury@ecy.wa.gov, 253-772-2794.

The permittee’s compliance history during the life of the permit being modified is available from

To request additional accommodation, please contact Jennifer Colburn

jennifer.m.colburn@ecy.wa.gov or

10 working days prior to the event.

2560 makes every effort to honor accommodation requests.

Learn more about Hanford cleanup at www.hanford.gov

FROM PAGE 1A

DEPUTIES

a Tri-City hospital, where

he was diagnosed with a

massive, could be in dire need

of hospital, to be

evaluated.

Meanwhile, Perez was

taken to a hospital to be

critically assessed

and going to jail. He allegedly

was committed with hospital

tal staff and had to be

secured to a gurney.

Two days later, he was

interviewed by detectives and

admitted using both

marijuana and metham-

phetamine, court docu-

ments said.

Perez said that “every-

thing went south” because

the deputes were not patient in going him

enough time to comply.”

White House about con-

sidering a pardon for Ma-

nafort, saying such a step

could trigger congression-

al debates about limiting

a president’s pardon pow-

er.

Such a move would be

a “terrible mistake,” he

said. “Pardons should be

used judiciously. They’re

used for cases with

extraordinary cir-

cumstances.”

So, Aung King, an

independent from Maine

and a member of the Sen-

ate intelligence commit-

ttee, cautioned against a

rush to impeachment, which he said could

interpret as “politi-

cal revenge and a coup

against the president.”

“The best way to solve a

problem like this, to me, in

elections,” King said.

documents said. “He ini-

tially steered Deputy

Fusco in the head with the

flashlight, but then

steered that he accidentally

hit Deputy Energy with it.

Experts said that “every-

thing went south” because

the deputes were not patient in going him

enough time to comply.”
Upcoming Public Comment Period on Proposed Changes to the Hanford Dangerous Waste Permit for Modifications to Sitewide Security Requirements

The U.S. Department of Energy Richland Operations Office is planning a 60-day public comment period to support a Class 2 Permit Modification to the Hanford Dangerous Waste Permit. The modification proposes changes to Attachment 3, which addresses security requirements.

Updates to Attachment 3 include documentation of the site’s 24-hour surveillance system, personnel access requirements, perimeter area fences, barricades, and signage. The signage updates describe the Wye Barricade, no trespassing, perimeter, unit group, and Columbia River signs.

The public comment period is expected to begin in December 2018, with a public meeting planned for January 2019. A summary fact sheet and details of the public meeting will be provided when the comment period begins.

Electronic access to the proposed plan and supporting documentation will be available for review on the Hanford.gov events calendar, and in the Administrative Record and Public Information Repositories.

Questions? Please contact Kristen Holmes, DOE Richland Operations Office, at kristen.l.holmes@rl.doe.gov.

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Comment Period on Proposed Changes to the Hanford Sitewide Security Requirements in the Hanford Dangerous Waste Permit

The U.S. Department of Energy (DOE) Richland Operations Office is holding a 60-day public comment period from Dec. 10, 2018, to Feb. 11, 2019, for a Class 2 Permit Modification to the Hanford Dangerous Waste Permit. This proposed modification would update Attachment 3, Security.

The proposed updates include documentation of the Hanford Site’s 24-hour surveillance system, personnel access requirements, perimeter area fences, barricades, and signage. The signage updates describe the Wye Barricade, no trespassing, perimeter, unit group, and Columbia River signs.

A public meeting will be held Jan. 16, 2019, 5:30 p.m., Richland Public Library, 955 Northgate Dr. Richland, Washington 99352. Please see the attached summary fact sheet. To read the full documentation, please see the Hanford.gov Events Calendar, the Administrative Record and the Public Information Repositories.

Visit https://go.usa.gov/xPzjn to review details on these proposed changes. Please submit any comments by Feb. 11, 2019, by mail to:

Washington Department of Ecology
3100 Port of Benton Boulevard
Richland, WA 99354
or electronically at: http://wt.ecology.commentinput.com/?id=9eAsZ

For questions, please contact:

Kristen Holmes, DOE, kristen.l.holmes@rl.doe.gov, 509-376-5803
Randy Bradbury, Washington State Dept. of Ecology, randy.bradbury@ecy.wa.gov, 509-372-7954

The permittee’s compliance history during the life of the permit being modified is available from the Washington Department of Ecology contact person above.

To request disability accommodation, please contact Jennifer Colborn, jennifer_m_colborn@rl.gov, 509-376-5840, in our external affairs office at least 10 working days prior to the event.
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