



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

## **Response to Comments**

**Proposed Updates to Permit for Hanford  
Dangerous Waste Management Units**

**March 25 – May 24, 2013**

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

June 2013

Publication no. 13-05-013

## Publication and Contact Information

This publication is available on the Department of Ecology's website at <http://www.ecy.wa.gov/biblio/nwp.html>

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

*If you need this document in a format for the visually impaired, call the Nuclear Waste Program at 509-372-7950. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.*

# **Response to Public Comments**

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**Proposed Updates to Permit for Hanford  
Dangerous Waste Management Units**

**March 25 – May 24, 2013**

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, dangerous waste regulations require public comment periods to allow the public to review the change(s) 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:	Proposed Updates to Permit for Hanford Dangerous Waste Management Units, March 25 – May 24, 2013
Permit:	<i>Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Part III Operating Unit Group 3, Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility</i>
Original issuance date:	January 28, 1998
Permit:	<i>Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Part 11, Integrated Disposal Facility.</i>
Original issuance date:	March 6, 2006
Draft effective date:	June 20, 2013

To see more information related to the Hanford Site or 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 type of permit change in this request is termed a “Class 2.” These modifications are more significant than “Class 1” modifications, and less significant than “Class 3” modifications. A table in WAC 173-303-830 describes changes and what class they are.

This update to Hanford’s dangerous waste permit addresses changes needed for two operating units, the Liquid Effluent Retention Facility and the Effluent Treatment Facility (LERF-ETF) and the Integrated Disposal Facility (IDF). LERF-ETF stores and treats liquid waste from various Hanford activities, such as liquid boiled off from condensed tank waste and

contaminated groundwater from pump and treat systems. IDF is a disposal site for vitrified low-activity waste. There is no waste in this landfill yet.

The two permit units are not related. The permittee, United States Department of Energy (USDOE), chose to combine its two requests to simplify the permit modification process.

The proposed changes for the LERF-ETF are updates to tank volumes based on new engineering calculations, and changes to emergency pumping procedures. In particular, USDOE has determined the overall response time using the existing transfer pumps to be faster than installing emergency pumps, so seeks to use existing pumps.

The proposed change at the IDF involves a change to the monitoring schedules. The USDOE proposes to change the facility's leak-detection monitoring to quarterly and after major storms. The current practice is to measure leak detection for one five-day work week per quarter. They also change monitoring of the secondary leak detection system sump from monthly to quarterly.

## Public Involvement Actions

NWP encouraged public comment on the Class 2 permit modification for the LERF-ETF and the IDF during a 60-day public comment period held March 25 through May 24, 2013.

It is the permittee's responsibility [WAC 173-303-830 (4) (b) ii and iv] to hold a comment period and public meeting for Class 2 permit changes. The permittee mailed a public notice announcing the comment period to 2,072 interested members of the public. The permittee featured the comment period on its website.

NWP also encouraged public comment by featuring the comment period on our website. In response to a request from the public, we also posted a redline/strikeout version of the permit so the public could see the precise changes. Ecology also posted the comment period as an event on our [Hanford Education & Outreach Facebook page](#), which had about 196 'likes' then.

The permittee ran a display advertisement in the Tri-City Herald on March 25, 2013. They mailed a notice announcing the start of the comment period to the [Hanford-Info email list](#), which had 1,106 subscribers in March.

The permittee held a public meeting on April 22, 2013. No members of the public attended or gave testimony.

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

1. Public notice (focus sheet).
2. Display advertisement in the *Tri-City Herald*.
3. Notice sent to the Hanford-Info email list.
4. Event posted on Ecology Hanford Education & Outreach Facebook page.

## Response to Comments

### Description of Comments

Ecology accepted comments from March 25 until May 24, 2013. We received three sets of comments, all via email. This section shows all the comments that we received during the public comment period and our responses in accordance with RCW 34.05.325(6)(a)(iii). The comments are shown in their original format in [Appendix B](#).

## YN Comments on Proposed Class 2 Modification to the ETF/LERF Permit:

1. Clarification requested on deleted text as indicated by highlight found in F.2.1 Unloading Operations, Spill Prevention, and Control:

“Underground pipelines that transfer aqueous waste to and from the LERF are encased in a secondary pipe. If a leak is detected in a pipeline, flow in the pipeline will be stopped and the cause of the leak investigated and remediated. If it is required to transfer aqueous waste from one LERF basin to another, existing transfer pumps are used **as described in Addendum C**. **Submersible pumps are located in risers at the northwest corner of a basin. Valves are closed or opened depending on the direction of the fluid transfer. Pumps are started, providing a cumulative flow of between 2,000 and 3,000 liters per minute into another basin.**”

Modification submittal letter states the LERF/ETF Permit stated that portable pumps would be used at the LERF basins in an emergency pumping situation. This deleted text does not state there would be installation of portable pumps during an emergency. Nor could any such reference be found in the documents provided for review in this modification request. The closest text to this maybe in section C.5.3.3 (\*see text below) but this still doesn't empirically require installation of portable pumps. Where is this statement found? Is this a reference to the highlighted text found in C.5.3.3?

### \*C.5.3.3 Outflow Destination

Aqueous waste in the LERF is transferred routinely to 200 Area ETF for treatment. However, should it be necessary to immediately empty a basin, the aqueous waste either would be transferred to the 200 Area ETF for treatment or transferred to another basin (or basins), whichever is faster. If necessary a temporary pumping system may be installed to increase the transfer rate.

*RESPONSE: It is correct that the reference to Addendum C is referring to the notation in Section C.5.3.3. In an emergency situation, the existing transfer pumps could be removed and higher flow portable pumps, with a cumulative flow of 2,000 to 3,000 cfm, could be installed as an option. As stated in the transmittal letter for the proposed Class II permit modification, the overall response time using the existing transfer pumps was determined to be superior (approximately 26.9 days total time using existing transfer pumps versus 37.6 days using portable submersible pumps). Therefore, the current plan to use existing pumps would provide a faster response to an emergency situation.*

Does this modification remove current submersible pumps? Are they one in the same? We do not support removal of current equipment without replacement of equal or better equipment. We do not support removal of the option to have temporary pumps installed to increase the transfer rates.

*RESPONSE: This modification does not remove current pumps. This modification changes the planned response to an emergency pumping to utilize existing transfer pumps, but allows for installation of other pumps as stated above.*

Why is some of the text in red and others in blue? Reader has difficulty discerning what the actual revised language is.

*RESPONSE:* Different changes were made to the documents at different times, and Microsoft Word automatically did the redline/strikeout in different colors. DOE/CHPRC will evaluate correcting this in future transmittals to avoid confusion.

Note: additional volumes noted on Part A do not seem to be reflected by the corrected values as indicated in text changes. Clarification requested.

*RESPONSE:* The proposed Class II permit modification changes for volume are for Addendum C. Part A volumes are maximum design volumes, while most volumes in Addendum C are nominal operating volumes. Nominal operating volumes are the volumes at which a tank or component is operated and are typically less than maximum design volumes contained in the Part A. Part A maximum design volumes did not change in this proposed permit modification.

2. Clarification requested on text indicated by highlight found in C.3.4.3 Containment System Capacity.

“Because they are interconnected by floor drains, both the process area and the container storage area are considered in the containment system capacity. The volume available for secondary containment in the process area is approximately 68,000 liters, as discussed in the engineering assessment (Mausshardt 1995). Using the dimensions of the container storage area (23.6 by 8.5 by 0.2 meters), and assuming that 50 percent of the floor area is occupied by containers, the volume of the container storage area is 15,300 liters. The container handling area also provides 10,500 liters of containment as it is connected to the other two areas. The combined volume of both the container storage area and process areas, and container handling area available for secondary containment, therefore, is 93,800 liters.”

Review of included figures seems to indicate the container handling area to be within the process areas. If so, this containment area has already been accounted for and should not be applied as additional available secondary containment area. Clarify.

*RESPONSE:* The container handling area is not within the process area. The container handling area is part of the “Truck Bay Loading Areas” shown in Figure C.4. Based on this comment, and for clarity in the permit, Ecology will require the permittee to change the proposed language in C.3.4.3 to refer to the “container handling area” as the “Truck Bay loading Area” and reference Figure C.4.

**YN Comments on Proposed Class 2 Modification to the IDF Permit:**

Clarification requested on deleted text in Section 6.2.3.2.4, Leachate Collection and Removal System: “In addition, evaluation on the leachate transfer lines for freeze and thaw damage will be conducted when appropriate.”

- Does this eliminate this requirement for active-life? Clarify that evaluations remain and will be conducted on leachate transfer lines for freeze and thaw damage with active-life.

*RESPONSE:* During pre-active life, the leachate transfer lines are not expected to contain leachate; therefore, damage due to freeze and thaw are not a concern. During active life,

*when the leachate transfer lines are expected to contain leachate, evaluations of the lines for damage due to freeze and thaw will be conducted as required for active life leachate collection system operations.*

Clarification requested on edited text as indicated by highlight found in 6.2.3.2.2 Leak Detection System: “During pre-active life, the leak detection system will be monitored quarterly and after storms (Table 6.2) for the amount of liquid removed. To calculate the action leakage rate, measurements are needed to be collected over five consecutive days each quarter. The action leakage rate will be determined for the quarter using these measurements collected during one five day work week each quarter.”

- It is unclear to the reader how calculation of the action leakage rate affects how the leak detection system will be monitored after a storm event. Clarify intent.

*RESPONSE: Calculation of the action leakage rate will be conducted on a quarterly basis as required. Separate from the quarterly action leakage rate calculations, the leak detection system will also be monitored after a storm event occurs. The intent of monitoring after a storm event is to determine the effect of stormwater on the leak detection system; whereas, periodic leakage rate calculations would determine normal or baseline operating conditions.*

- Why is some of the text in red and others in blue? Reader has difficulty discerning what the actual revised language is.

*RESPONSE: Different changes were made to the documents at different times, and Microsoft Word automatically sets the redline/strikeout in different colors. USDOE/CHPRC will evaluate correcting this in future transmittals to avoid confusion.*

## **Jeanne Raymond Comments**

It is obvious to me that Hanford is not a safe place for Hazardous Waste. Because of the proximity to the Columbia River, the underground water seeping into the Columbia River, and the promise to residents that Hanford would be cleaned up, not buried, I think that all hazardous waste must be removed from Hanford. Furthermore, burying hazardous waste, even low levels, in lined landfills, is NOT disposing of this material. Shifting it to another area does not honor that promise.

*RESPONSE: Thank you for your comment. This permit modification does not address removal of waste from Hanford. The changes are to revise monitoring schedules at the Integrated Disposal Facility (IDF) and improve emergency pumping methods at the Liquid Effluent Retention Facility and Effluent Treatment Facility (LERF-ETF). The proposed changes ensure workers can manage waste safely.*

*Plans for Hanford’s cleanup do call for the worst of the waste to leave Hanford for disposal elsewhere, but Hanford will keep some wastes. The IDF is a disposal site, though it has no waste yet. LERF only stores liquid wastes until they can be treated. The ETF treats liquid waste so it is not harmful, and the extracted harmful material goes to a permitted discharge site.*

*However, Washington State agrees that Hanford should not be the permanent storage site for all the waste. We believe Hanford's high-level waste must be treated and stored in an off-site deep geologic repository, to protect residents of the Northwest and the Columbia River from future contamination.*

**YN Comments on Proposed Class 2 Modification to the ETF/LERF & IDF Permit:**

Please put the Class 2 mods for ETF/LERF & IDF on the Ecology website per WAC 173-303-830(4)(b)(v) requirements.

*RESPONSE: [Ecology replied that we had done so, and provided the link]*

Yes in part. I apologize; I did not scroll downward enough to see the link you provided. Glad to see it listed.

However, someone at Ecology should review the WAC I cited. It clearly defines that while the permittee is responsible for the PI announcements, it is Ecology's responsibility to receive the comments and disposition them as they-Ecology-modifies the permit. This deviation from the regulations needs changing. I would like a response to this portion of my concern.

*RESPONSE: A number of people at Ecology have reviewed WAC 173-303-830 (4)(b)v. The statement in regulations, "Comments should be submitted to the department of ecology contact identified in the public notice," does not state who should submit the comments. We believe this means the public can submit comments directly to Ecology, or the permittee can collect them and submit them to us.*

*We have not deviated from the regulation. We have responded to comments as we made our permitting decisions. Further, the regulations do not require anything be posted online; these regulations are silent on the topic of online accessibility. We agreed to post the Class 2 permit modifications on our website, and to provide a redline-strikeout copy, as you requested, because they are good ideas for improving access to decision-making materials.*

## List of Commenters

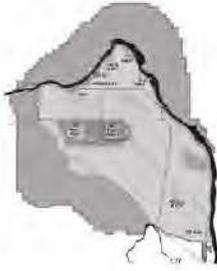
The table below lists the names of organizations or individuals who submitted comments and the page numbers of Ecology's responses.

Commenter	Page(s) for response
Yakama Nation	10-12
Jeanne Raymond	13
Yakama Nation	13-14

# Appendix A: Copies of All Public Notices

Public notices for this comment period:

1. Public notice (focus sheet).
2. Display advertisement in the *Tri-City Herald*.
3. Notice sent to the Hanford-Info email list.
4. Event posted on Ecology Hanford Education & Outreach Facebook page.



# Public Comment Period on Proposed Updates to Permit for Hanford Dangerous Waste Management Units

The U.S. Department of Energy Richland Operations Office (DOE-RL) is holding a 60-day comment period on proposed Class 2 modifications to the Hanford Facility Dangerous Waste Permit. These changes involve the Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility (LERF/ETF), and the Integrated Disposal Facility (IDF). We want your input!

March 2013 U.S. Department of Energy

## Background

Proposed Class 2 modifications involve Treatment, Storage, and Disposal (TSD) units in Part III (Unit-Specific Conditions for Operating Units) of Hanford's Dangerous Waste Permit. The proposed modifications include updates to tank volumes based on new engineering calculations and changes to emergency pumping procedures at the LERF/ETF. The proposed modification at IDF involves a change to the monitoring schedule for the leak detection system. IDF has not received waste for disposal and is now being monitored.

*Class 2 Modifications are periodic updates to the Hanford Dangerous Waste Permit, such as response to new regulations, technological advancements, and variations in waste types or quantities. All Class 2 changes require Ecology approval.*



LERF & 200 Area ETF (upper photo) is a waste water storage and treatment system in the 200 East Area (in the center of the Hanford Site). The system receives process waste water from the 242-A Evaporator, 200 West Area groundwater, and other Hanford remediation and waste management activities. The LERF consists of lined surface basins. Waste water from LERF is pumped to ETF for treatment in process units that remove contaminants.



The IDF (lower photo) is a permitted, lined landfill in the 200 East Area (in the center of the Hanford Site) for disposal of mixed low-level and low-level waste from Hanford cleanup activities. The IDF has not received any wastes to date.

The permittee's compliance history during the life of the permit being modified is available from the Washington State Department of Ecology contact person, Ron Skinnarland at (509) 372-7924 or [Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov). Copies of the proposed permit modification and supporting documentation are available at the Administrative Record, 2440 Stevens Drive, Richland, Washington, or at <http://www5.hanford.gov/arpir/?content=findpage&Akey=0089309>



## Public Comment

DOE-RL wants your feedback on these proposed modifications. The public comment period will run from **March 25 through May 24, 2013**. A public meeting will be held on April 22, 2013 at 6 p.m., Washington State Department of Ecology office, 3100 Port of Benton Boulevard, Richland, WA



Figure 1. Public Notice (page 1 of 2).

## How you can become involved

A 60-day public comment period on *proposed Class 2 Modifications to Part III of Hanford's Dangerous Waste Permit* will run from **March 25 through May 24, 2013**. A public meeting will be held April 22, 2013 at 6 p.m., Washington State Department of Ecology office, 3100 Port of Benton Boulevard, Richland, WA. **Please submit comments by May 24, 2013 to:**



Tiffany Nguyen  
 U.S. Department of Energy  
 Richland Operations Office  
 P.O. Box 550, A7-75  
 Richland, WA 99352  
 Email: [TSDRCRAM@rl.gov](mailto:TSDRCRAM@rl.gov)

### The documents are available for review at the Public Information Repositories listed below.

<p>Portland State University                      Government Information                      Branford Price Millar Library                      1875 SW Park Avenue                      Portland, OR 97207-1151                      Attn: Claudia Weston                      (503) 725-4542                      Map: <a href="http://www.pdx.edu/map.html">http://www.pdx.edu/map.html</a></p>	<p>University of Washington                      Suzzallo Library                      Government Publications Dept.                      P.O. Box 352900                      Seattle, WA 98195-2900                      Attn: Hilary Reinert                      (206) 543-5597                      Map: <a href="http://tinyurl.com/m8ebj">http://tinyurl.com/m8ebj</a></p>	<p>U.S. Department of Energy                      Public Reading Room                      Washington State University, Tri Cities                      Consolidated Information Ctr.,                      Rm. 101-L                      2770 Crimson Way                      Richland, WA 99352                      Attn: Janice Parthree (509) 372-7443                      Map: <a href="http://www.tricity.wsu.edu/campusmaps/campusmap.pdf">http://www.tricity.wsu.edu/campusmaps/campusmap.pdf</a></p>	<p>Gonzaga University                      Foley Center Library                      East 502 Boone Avenue                      Spokane, WA                      Attn: John Spencer                      (509) 313-6110                      Map: <a href="http://tinyurl.com/2c5bpm">http://tinyurl.com/2c5bpm</a></p>
<p>Administrative Record and Public Information Repository:                      Address: 2440 Stevens Center Place, Room 1101, Richland, WA.                      Phone: 509-376-2530 Web site address: <a href="http://www5.hanford.gov/arpir/">http://www5.hanford.gov/arpir/</a></p>			

**Class 2 Permit Modification Fact Sheet**  
 U.S. Department of Energy  
 Richland Operations Office  
 P.O. Box 550, A7-75  
 Richland, WA 99352

**Figure 1. Public Notice (page 2 of 2).**



# Proposed Updates to Permit for Hanford Dangerous Waste Management Units

The U.S. Department of Energy, Richland Operations Office (DOE-RL) is holding a 60-day comment period on proposed Class 2 modifications to the Hanford Facility Dangerous Waste Permit. The proposed modifications include:

- Updates to tank volumes and changes to emergency pumping procedures at the Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility
- A change to the Integrated Disposal Facility's leak detection system monitoring schedule

DOE-RL would appreciate your input on these proposed permit modifications!

Please submit comments by **May 24, 2013**, to:

**Tiffany Nguyen**

U.S. Department of Energy - Richland Operations Office

P.O. Box 550, MS: A7-75, Richland, Washington 99352

Email: [TSDRCRAM@rl.gov](mailto:TSDRCRAM@rl.gov)

The Public Comment Period runs from:

**March 25 – May 24, 2013**



A public meeting will be held Tuesday, April 22, 2013, 6-7 p.m., at the Washington State Department of Ecology office, 3100 Port of Benton Boulevard in Richland

Please e-mail [TSDRCRAM@rl.gov](mailto:TSDRCRAM@rl.gov)

if you require special accommodations to participate in the meeting.

Copies of the proposed permit modification and supporting documentation are available at the Administrative Record, 2440 Stevens Drive, Richland, Washington

<http://www5.hanford.gov/arpir/?content=findpage&AKey=0089309>

Figure 2. Display Advertisement in the Tri-City Herald.

----- Original message -----

Subject: Upcoming Public Comment Period on Proposed Class 2 Permit Modifications for the Integrated Disposal Facility

From: ^DOE <DOE1@RL.GOV>

To: HANFORD-INFO@LISTSERV.WA.GOV

CC:

**This is a Message from the U.S. Department of Energy**

**Upcoming Public Comment Period on Proposed Class 2 Permit Modifications for the Integrated Disposal Facility**

The U.S. Department of Energy plans to hold a 60-day public comment period on proposed modifications to the Hanford Facility Dangerous Waste Permit.

These Class 2 modifications involve one operating Treatment, Storage, and Disposal unit for the Integrated Disposal Facility (IDF). The IDF is a permitted, lined landfill located in the 200 East Area (in the center of the Hanford site) that was constructed to accept mixed low-level and low-level waste landfill from Hanford cleanup activities. The IDF has not received any wastes to date. The modifications involve changing the monitoring schedule for the landfill's leak detection systems.

Class 2 modifications apply to periodic updates to the permit, such as response to new regulations, technological advancements, and variations in system monitoring. All Class 2 Hanford permit changes require Ecology approval.

The comment period for these modifications is expected to begin in March. A public meeting will be held during the comment period.

**Figure 3. Advance notice sent to the Hanford-Info email list.**

**From:** [^DOE](#)  
**To:** [HANFORD-INFO@LISTSERV.WA.GOV](mailto:HANFORD-INFO@LISTSERV.WA.GOV)  
**Subject:** Public Comment Period on Proposed Updates to Permit for Hanford Dangerous Waste Management Units  
**Date:** Monday, March 25, 2013 10:12:11 AM  
**Attachments:** [2013 Class 2 ModificationsFINAL.pdf](#)

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

**Public Comment Period on Proposed Updates to  
Permit for  
Hanford Dangerous Waste Management Units**

*The U.S. Department of Energy Richland Operations Office (DOE-RL) is holding a 60-day comment period (March 25 through May 24, 2013) on proposed Class 2 modifications to the Hanford Facility Dangerous Waste Permit. These changes involve the Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility (LERF/ETF), and the Integrated Disposal Facility (IDF). We want your input!*

**Class 2 Modifications** are periodic updates to the Hanford Dangerous Waste Permit, such as response to new regulations, technological advancements, and variations in waste types or quantities. All Class 2 changes require Ecology approval.

**Background**

Proposed Class 2 modifications involve Treatment, Storage, and Disposal (TSD) units in Part III (Unit-Specific Conditions for Operating Units) of Hanford's Dangerous Waste Permit. The proposed modifications include updates to tank volumes based on new engineering calculations and changes to emergency pumping procedures at the LERF/ETF. The proposed modification at IDF involves a change to the monitoring schedule for the leak detection system. IDF has not received waste for disposal and is now being monitored.

**LERF & 200 Area ETF** (*upper photo*) is a waste water storage and treatment system in the 200 East Area (in the center of the Hanford Site). The system receives process waste water from the 242-A Evaporator, 200 West Area groundwater, and other Hanford remediation and waste management activities. The LERF consists of lined surface basins. Waste water from LERF is pumped to ETF for treatment in process units that remove contaminants.

**The IDF** (*lower photo*) is a permitted, lined landfill in the 200 East Area (in the center of the Hanford Site) for disposal of mixed low-level and low-level waste from Hanford cleanup activities. The IDF has not received any wastes to date.

The permittee's compliance history during the life of the permit being modified is available from the Washington State Department of Ecology contact person, Ron Skinnerland at (509)

**Figure 4. Notice sent to the Hanford-Info email list (page 1 of 2).**

372-7924 or [Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov). Copies of the proposed permit modification and supporting documentation are available at the Administrative Record, 2440 Stevens Drive, Richland, Washington, or at <http://www5.hanford.gov/aroir/?content=findpage&AKey=0089309>

### **How you can become involved**

A 60-day public comment period on *proposed Class 2 Modifications to Part III of Hanford's Dangerous Waste Permit* will run from **March 25 through May 24, 2013**. A public meeting will be held April 22, 2013 at 6 p.m., Washington State Department of Ecology office, 3100 Port of Benton Boulevard, Richland, WA. **Please submit comments by May 24, 2013 to:**

Tiffany Nguyen  
U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550, A7-75  
Richland, WA 99352  
Email: [TSDRCRAM@rl.gov](mailto:TSDRCRAM@rl.gov)

**Figure 4. Notice sent to the Hanford-Info email list (page 2 of 2).**

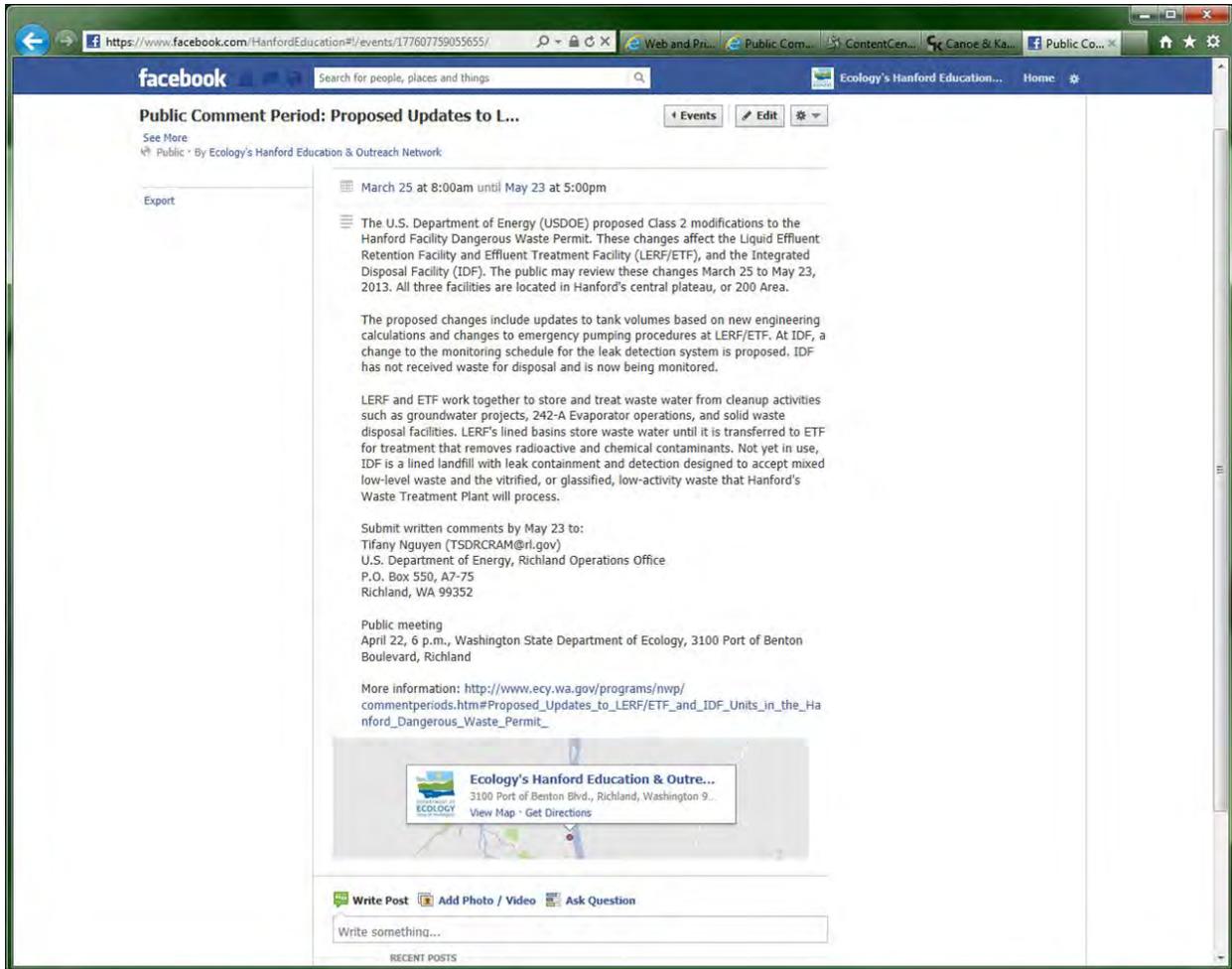


Figure 5. Facebook event for comment period.

# Appendix B: Copies of All Written Comments

## YN Comments on Proposed Class 2 Modification to the ETF/LERF Permit:

1. Clarification requested on deleted text as indicated by highlight found in F.2.1 Unloading Operations, Spill Prevention, and Control:

*Underground pipelines that transfer aqueous waste to and from the LERF are encased in a secondary pipe. If a leak is detected in a pipeline, flow in the pipeline will be stopped and the cause of the leak investigated and remediated. If it is required to transfer aqueous waste from one LERF basin to another, existing transfer pumps are used as described in Addendum C. Submersible pumps are located in risers at the northwest corner of a basin. Valves are closed or opened depending on the direction of the fluid transfer. Pumps are started, providing a cumulative flow of between 2,000 and 3,000 liters per minute into another basin.*

- Modification submittal letter states the LERF/ETF Permit stated that portable pumps would be used at the LERF basins in an emergency pumping situation. This deleted text does not state there would be installation of portable pumps during an emergency. Nor could any such reference be found in the documents provided for review in this modification request. The closest text to this maybe in section C.5.3.3 (\*see text below) but this still doesn't empirically require installation of portable pumps. Where is this statement found? Is this a reference to the highlighted text found in C.5.3.3?
- Does this modification remove current submersible pumps? Are they one in the same? We do not support removal of current equipment without replacement of equal or better equipment. We do not support removal of the option to have temporary pumps installed to increase the transfer rates.
- Why is some of the text in red and others in blue? Reader has difficulty discerning what the actual revised language is.
- Note: additional volumes noted on Part A do not seem to be reflected by the corrected values as indicated in text changes. Clarification requested.
  - \* C.5.3.3 Outflow Destination  
Aqueous waste in the LERF is transferred routinely to 200 Area ETF for treatment. However, should it be necessary to immediately empty a basin, the aqueous waste either would be transferred to the 200 Area ETF for treatment or transferred to another basin (or basins), whichever is faster. *If necessary a temporary pumping system may be installed to increase the transfer rate.*

2. Clarification requested on text indicated by highlight found in C.3.4.3 Containment System Capacity. *Because they are interconnected by floor drains, both the process area and the container storage area are considered in the containment system capacity. The volume available for secondary containment in the process area is approximately 68,000 liters, as discussed in the engineering assessment (Mausshardt 1995). Using the dimensions of the container storage area (23.6 by 8.5 by 0.2 meters), and assuming that 50 percent of the floor area is occupied by containers, the volume of the container storage area is 15,300 liters. The container handling area also provides 10,500 liters of containment as it is connected to the other two areas. The combined volume of both the container storage area and process areas, and container handling area available for secondary containment, therefore, is 93,800 liters.*

- Review of included figures seems to indicate the container handling area to be within the process areas. If so, this containment area has already been accounted for and should not be applied as additional available secondary containment area. Clarify.

## YN Comments on Proposed Class 2 Modification to the IDF Permit:

1. Clarification requested on deleted text as indicated by highlight found in 6.2.3.2.4 Leachate Collection and Removal System.

*During pre-active life, the Leachate Collection and Removal System is inspected quarterly and after storms (Table 6.2) for the presence of liquids, and that the system is functioning properly. During active-life (Table 6.3), Liquids in the Leachate Collection and Removal System and Leak Detection System are monitored daily to ensure the action leakage rate (Chapter 4.0, Appendix 4A) is not exceeded and will be inspected per Table 6.2. In addition, a flow meter is used to check if the amount of actual leachate pumped corresponds to the amount accumulated in the leachate collection tank. This check will verify the proper function of the leachate collection and removal sump pumps with each use. In addition, evaluations on the leachate transfer lines for freeze and thaw damage will be conducted when appropriate.*

- Does this eliminate this requirement for active-life? Clarify that evaluations remain & will be conducted on leachate transfer lines for freeze and thaw damage with active-life.

2. Clarification requested on edited text as indicated by **highlight** found in 6.2.3.2.2 Leak Detection System.

*During pre-active life, the leak detection system will be monitored quarterly and after storms (Table 6.2) for the amount of liquid removed. To calculate the action leakage rate, measurements are needed to be collected over five consecutive days each quarter. The action leakage rate will be determined for the quarter using these measurements collected during one five day work week each quarter.*

- It is unclear to the reader how calculation of the action leakage rate affects how the leak detection system will be monitored after a storm event. Clarify intent.
- Why is some of the text in red and others in blue? Reader has difficulty discerning what the actual revised language is.

-----Original Message-----

From: ^TSDRCRAMods [<mailto:TSDRCRAM@rl.gov>]  
Sent: Monday, April 22, 2013 9:12 AM  
To: Collins, Michael S; Nguyen, Tiffany L; Seaver, Jennie R; Bohrmann, Dieter (ECY)  
Subject: FW: Comments Hanford Dangerous waste

Comments for the LERF/ITF/IDF Permit Class 2 Modifications ...

-----Original Message-----

From: Jeanne Raymond [<mailto:raymondi@peak.org>]  
Sent: Monday, March 25, 2013 11:08 AM  
To: ^TSDRCRAMods  
Subject: Comments Hanford Dangerous waste

Comments on Hanford Dangerous Waste Disposal

It is obvious to me that Hanford is not a safe place for Hazardous Waste. Because of the proximity to the Columbia River, the underground water seeping into the Columbia River, and the promise to residents that Hanford would be cleaned up, not buried, I think that all hazardous waste must be removed from Hanford. Furthermore, burying hazardous waste, even low levels, in lined landfills, is NOT disposing of this material. Shifting it to another area does not honor that promise.

Sincerely,  
Jeanne Raymond  
Corvallis, OR

**From:** Jean Vanni [<mailto:JVanni@ynerwm.com>]  
**Sent:** Wednesday, April 17, 2013 1:42 PM  
**To:** Holmes, Erika (ECY)  
**Cc:** Hedges, Jane (ECY); Bartus, Dave  
**Subject:** class 2 mods to RCRA permit

Please put the Class 2 mods for ETF/LERF & IDF on the Ecology website per WAC 173-303-830(4)(b)(v) requirements. Thank you. Jean

JEAN VANNI  
Dept. of Natural Resources  
Yakama Nation ERWM Program  
[jvanni@ynerwm.com](mailto:jvanni@ynerwm.com)  
509-945-1100

[Ecology replied that we had done so, and provided the link]

From: Jean Vanni [<mailto:JVanni@ynerwm.com>]  
Sent: Wednesday, April 17, 2013 1:52 PM  
To: Holmes, Erika (ECY)  
Cc: Hedges, Jane (ECY); Bartus, Dave; [office@hoanw.org](mailto:office@hoanw.org); Jean Vanni  
Subject: RE: class 2 mods to RCRA permit

Yes in part. I apologize; I did not scroll downward enough to see the link you provided. Glad to see it listed.

However, someone at Ecology should review the WAC I cited. It clearly defines that while the permittee is responsible for the PI announcements, it is Ecology's responsibility to receive the comments and disposition them as they-Ecology-modifies the permit. This deviation from the regulations needs changing. I would like a response to this portion of my concern. Thank you,  
Jean