

Response to Comments

Class 2 Permit Modification to Revise Liner Repair Procedures at the Liquid Effluent Retention Facility

August 25 – October 24, 2014

Summary of a public comment period and responses to comments

PUBLICATION AND CONTACT INFORMATION

This publication is available on the Department of Ecology's (Ecology) website at <https://fortress.wa.gov/ecy/publications/SummaryPages/1405020.html>

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- 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 \(9\)](#).

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 Comments

Class 2 Permit Modification to Revise Liner Repair Procedures at the Liquid Effluent Retention Facility August 25 – October 24, 2014

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 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: *Class 2 Permit Modification to Revise Liner Repair Procedures at the Liquid Effluent Retention Facility, August 25 – October 24, 2014*

Permit: *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste*

Original issuance date: *January 28, 1998*

Final effective date: *December 24, 2014*

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

REASONS FOR ISSUING THE PERMIT

This permit change request is a "Class 2 modification." WAC 173-303-830, Appendix I, describes permit changes and how the class is determined.

This update is for the portion of Hanford's permit for the [Liquid Effluent Retention Facility \(LERF\)](#) and the [200 Area Effluent Treatment Facility](#). This unit of Hanford's permit handles liquid wastes from groundwater remediation and the condensate from the 242-A Evaporator.

The LERF has large aboveground basins to store contaminated liquids. The liner of one of the basins has tears near the top of the basin liner. The permittees consulted the liner vendor and learned it is not necessary to empty the basin to repair this tear. The permittees requested changes to the permit language to allow the repair to proceed without emptying the basin. This would let the repair proceed more quickly. The specific proposed changes were for the Process Information chapter (Addendum C), Section C.5.2.4.1.

The permittees for this portion of the permit are the U.S. Department of Energy (DOE) and CH2M Hill Plateau Remediation Company. The permittees also submitted a Temporary Authorization request to enable the proposed work to start sooner, and Ecology approved the request.

PUBLIC INVOLVEMENT ACTIONS

Public comment was encouraged on this Class 2 permit change during a 60-day public comment period held August 25 through October 24, 2014.

Under WAC 173-303-830(4)(b), the permittee is responsible to hold a comment period and a public meeting for Class 2 permit changes. To meet these requirements, the permittee:

- Mailed a notice announcing the comment period to the 1,953 interested members of the public on the postal list.
- Featured the comment period on its website.
- Placed an advertisement in the *Tri-City Herald* on August 25, 2014.
- Emailed advance notice of the comment period to the Hanford-Info email list.
- Sent a notice announcing the start of the comment period to the Hanford-Info email list, which had 1,454 subscribers at that time.
- Held a public meeting on September 15, 2014. No members of the public attended and no public comments resulted at the meeting.

NWP also provided a redline-strikeout version on our website and posted a notice on Twitter about the comment period and the public meeting on our [@ecyhanford](#) Twitter account.

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

- Comment period summary
- Transmittal letter
- Temporary Authorization Request
- Addendum C – Process Information section of the LERF part of the permit.

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

1. Comment period summary
2. Advertisement in the *Tri-City Herald*
3. Advance email notice sent to the Hanford-Info email list
4. Comment period start announcement sent to the Hanford-Info email list
5. Tweets to Ecology's Twitter account for the public meeting and for the comment period(s) underway. (Four other comment periods were underway at the same time as the LERF Class 2 permit change.)

RESPONSE TO COMMENTS

NWP accepted comments on the LERF from August 25 until October 24, 2014. This section provides a summary of comments that 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. The NWP's responses directly follow each comment in italic font. Verbatim copies of all written comments are attached in [Appendix B](#).

Description of Comments:

Comment #1 from Leah Boehm Brady:

I do not think any waste should be put in the storage areas until all cracks in the liner have been fully repaired. I think it is very unwise to do otherwise.

Ecology Response:

Thank you for your comment. Ecology agrees the LERF basins should not receive more waste until the liner is repaired.

Comment #2 from Leah Boehm Brady:

I also oppose making new storage areas and letting new waste come into Hanford.

Ecology Response:

Thank you for your comment. The proposed permit changes are not for new waste or new storage areas, but to better manage the waste already at Hanford. Ecology and DOE have agreed that DOE will not import offsite waste to the Hanford Site (except for a few specified exceptions) until at least the Waste Treatment Plant is operational.

Comment #3 from Leah Boehm Brady:

All polluted areas must be cleaned up prior to importing new waste.

Ecology Response:

Thank you for your comment. The LERF is a storage facility for contaminated liquids before they are treated. It is not new. It was first permitted and operated in 1998. Before then, the contaminated liquids were discharged to the ground. We want the basins at LERF to stay in good repair and continue to hold liquids before they are treated

The State is committed to getting Hanford cleaned up. Ecology and DOE have agreed that DOE will not import offsite waste to the Hanford Site (except for a few specified exceptions) until at least the Waste Treatment Plant is operational.

Comment #4 from Mike Conlan:

Remove all nuclear waste from Hanford.

Ecology Response:

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

Comment #5 from Mike Conlan:

Replace all single shell tanks w/quality multi skinned tanks.

Ecology Response:

Thank you for your comment but single-shell tanks are not in the scope of this comment period. We agree the tanks pose a threat. We believe a better approach to addressing it is to remove the waste from the single-shell tanks and put it in the compliant double-shell tanks to prepare for eventual treatment in the Waste Treatment Plant now being built.

Comment #6 from Mike Conlan:

Do not allow any more nuclear waste on to facility.

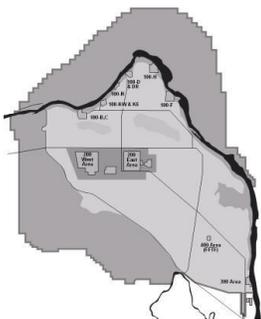
Ecology Response:

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

APPENDIX A: COPIES OF ALL PUBLIC NOTICES

Public notices for this comment period:

1. Public notice (focus sheet)
2. Classified advertisement in the *Tri-City Herald*
3. Notice sent to the Hanford-Info email list
4. Comment period tweeted on Ecology's [@ecyhanford](#) Twitter account
5. Public meeting tweeted on Ecology's [@ecyhanford](#) Twitter account



Public Comment Period on Proposed Updates to Hazardous Waste Permit for Hanford Site

The U.S. Department of Energy Richland Operations Office (DOE-RL) is holding a 60-day public comment period on proposed modifications to the Hanford Facility Dangerous Waste Permit. These Class 2 modifications involve changes to the procedure for repairing the basin liners at the Liquid Effluent Retention Facility (LERF) and 200 Area Effluent Treatment Facility (ETF). These updates are necessary to perform necessary maintenance while preventing disruption of waste receipt from various Hanford liquid waste generators.

August 2014

U.S. Department of Energy

Proposed changes

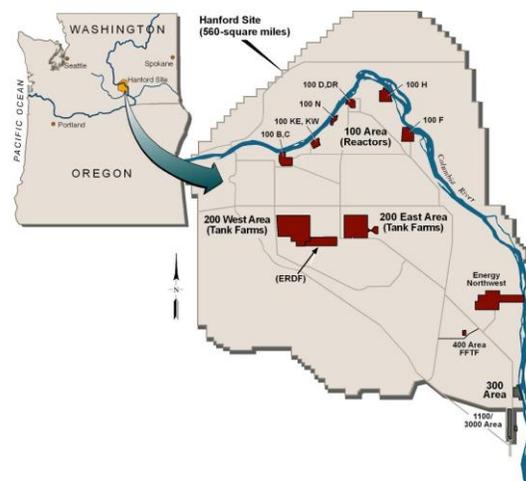
This proposed Class 2 modification is for the LERF/ETF Treatment, Storage, and Disposal (TSD) unit in Part III (*Unit Specific Conditions for Final Status Operations*) of Hanford's Dangerous Waste Permit.

This proposed change revises one chapter of the LERF/ETF unit by updating the procedure and methodology for liner repair. Recently, small tears that require repair were noted at the top of a basin at the LERF above the current waste level. The current permit requires the basin to be emptied prior to performing repairs. According to the liner manufacturer, these minor repairs can be performed while the basin is still receiving waste. Emptying the basin prior to performing the repairs would cause a disruption in receiving waste from other Hanford liquid waste generators. The modification would allow repairs to proceed without emptying the basin, and critical waste receiving activities could continue without disruption.

The proposed modifications include one section of the following chapter of the LERF/ETF permit: Chapter 4, Process Information. Changes to the chapter are submitted in red-line strikeout of the permit and presented in an attachment to the permit modification request. Only those changes identified are being submitted for modification and are undergoing public comment.

A red-line strikeout of the current permit versions of the chapter addendum outlining the proposed change was submitted to Ecology with this request. In addition, a temporary authorization request was included in the permit modification request.

A **temporary authorization (TA) request** is included in this permit modification request to allow for these liner repairs to proceed while the public comment period is held. This will prevent a disruption in waste management activities.



Class 2 Permit Modifications are periodic updates to the Hanford Dangerous Waste Permit, such as response to new regulations, edits to permit language, technological advancements, and variations in waste types or quantities. All Class 2 changes require approval from the Washington Department of Ecology (Ecology).



Public Comment

DOE-RL wants your feedback on these proposed modifications. The public comment period will run from **Aug. 25 to Oct. 24, 2014**.

A public meeting will be held Monday, Sept. 15, 5:30 to 6:30 p.m. at the Richland Public Library.

LERF/ETF

The LERF/ETF unit 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 to remove contaminants.



The DOE-RL contact person for this permit change is Kris Skopeck, (509) 376-5803. The Washington Department of Ecology contact person is Rick Bond, (509) 372-7950.

The permittees' compliance history during the life of the permit being modified is available from the Washington Department of Ecology contact person.

Copies of the proposed permit modification and supporting documentation are available for review at the public information repositories listed below and on Ecology's website,

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

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 **Aug. 25 through Oct. 24, 2014**. A public meeting will be held Sept. 15, 2014, at the Richland Public Library, 955 Northgate Drive in Richland. **Please submit comments by Oct. 24 to:**



Rick Bond
 Washington Department of Ecology
 3100 Port of Benton Boulevard
 Richland, WA 99354
 Email: Hanford@ecy.wa.gov



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

FERGUSON, MO.

Dad of slain teen asks for peace

Funeral planned today

ASSOCIATED PRESS

ST. LOUIS The father of a black 18 year old shot to death by a white police officer in Ferguson pleaded Sunday for a "day of silence" as he lays his son to rest today.

"All I want is peace," Michael Brown Sr. told hundreds of people in St. Louis' largest city park during brief remarks at a festival that promoted peace over violence. "That's all I ask."

The more than two weeks since Michael Brown's death have been marked by nightly protests, some violent and chaotic, although tensions have eased in recent days.

Brown Sr. told the crowd that he and his son's mother appreciate the support they've received from

the community. The Rev. Al Sharpton, who will speak at the funeral, echoed his request for peace.

"We don't want anything ... to happen that might defile the name of Michael Brown," Sharpton said.



Brown Sr.

"This is not about our rage tomorrow. It's about the legacy and memory of his son."

Peace Fest 2014 was already in the works before Officer Darren Wilson shot Brown on

Aug. 9 in a St. Louis suburb, but it took on new resonance in the aftermath.

The parents of slain Florida teen Trayvon Martin also spoke, urging the crowd to channel its anger into action by pushing to strengthen families and better educate youth.

"We're going to stand tall with

you all," Trayvon's Martin's father, Tracy Martin, said.

Trayvon Martin, 17, was also unarmed when he was shot and killed in 2012. George Zimmerman, a neighborhood watch volunteer who said he shot Martin in self defense, was acquitted.

The nightly protests in Ferguson have been mostly peaceful in recent days, a contrast to images of police in riot gear firing tear gas canisters at angry protesters in the days after the Brown shooting. Tensions briefly flared then subsided late Saturday night and early Sunday.

Missouri Gov. Jay Nixon reiterated his support Sunday for sticking with St. Louis County prosecutor Bob McCulloch. Brown's parents and others in the community have expressed concerns that the office would not be impartial because of McCulloch's ties to law enforcement.

Police say NYC woman stepped on child who died

ASSOCIATED PRESS

NEW YORK A child care worker charged with killing a toddler in her home told police she threw the boy to the floor and stepped on him three times, and after that he could no longer walk on his own, authorities said.

Athena Skeeter, 40, was arraigned Sunday on charges of manslaughter and endangering the welfare of a child.

The city's Administration for Children's Services did not immediately respond to a message seeking information on Skeeter, whom police said was a licensed child care worker.

According to a court document, Skeeter told police she had been wrestling Friday with 20 month old Cardell Williamson at her Bronx home after his father dropped him off that morning. She said the child was on the bed when she lifted him by one arm and one leg and put him on the floor. She told

police she stepped on his stomach but "didn't use full force."

Skeeter said she then put her son on top of Cardell and stepped on his stomach.

"Cardell acted different after that," Skeeter said, according to the court document. "He threw up. His head kept tilting."

She said she put him in a bathtub and put cold water on his face, and then stepped out for a short time. When she came back, Streater told police, Cardell's head was in the water and steam was coming up. She said he had burns on his arm and face.

Police responding to a 911 call found Cardell lying on a bed, struggling to breathe. He was pronounced dead at a hospital.

The medical examiner ruled his death a homicide.

Skeeter was in custody and is due back in court Thursday. No attorney information was available for her.

BRIEFS

County pays for damage from mudslide response

OSO Snohomish County has paid more than \$280,000 to owners of property damaged by search and rescue operations following the massive Oso mudslide.

The Everett Herald reported Sunday that within the first few days of the March 22 mudslide, county lawyers determined that landowners would need to be paid from rescue operations.

Land use agreements were reached as crews set up tents and first aid stations and created gravel parking lots on private land.

The county manager overseeing slide recovery, Gary Haakenson, said the Federal Emergency Management Agency is expected to reimburse the county for those costs.

Haakenson said landowners face a complicated bidding process in which the burden is on the property owners to provide receipts, pictures and other proof of the damage. The county is helping with the paperwork.

So far, \$282,000 has been paid to eight property owners.

Vancouver man drowns in Cowlitz reservoir

VANCOUVER, Wash. A 22 year old man drowned Saturday at a Cowlitz County reservoir.

The Vancouver Columbian reported that Stephen W. Rilea of Vancouver was last seen swimming about 11:30 a.m. Saturday about 50 feet from shore when he went under water and did not surface. Nearby kayakers attempted to help him, but they were unsuccessful. A dive team from the Cowlitz County Sheriff's Office was unable to locate him as well.

Rilea's body was recovered Sunday afternoon.

Bicyclist struck, killed by truck near Hood River

HOOD RIVER, Ore. Oregon State Police say a bicyclist died after a collision with a pickup near Hood River on Sunday morning.

Lieutenant Gregg Hastings said the 52 year old woman was riding her bicycle along westbound Interstate 84 at Viento State Park interchange when a Ford pickup driven by a 55 year old man struck her from behind, ejecting the woman. The woman was pronounced dead at the scene. She was wearing a helmet.

Hastings said the driver is cooperating with the investigation.

The names of the bicyclist and driver were not released.

7-year-old shot by child playing with handgun

HAYDEN, Idaho Police in northern Idaho say a 7 year old boy has been shot in the head after two unsupervised children played with a handgun and it discharged.

The Kootenai County Sheriff's Office says deputies responded about 7 a.m. Saturday to the Midtown Mobile Park in Hayden.

Police say the boy was struck by a small caliber bullet.

He was taken to Kootenai Health in Coeur d'Alene, then transferred to Sacred Heart Medical Center and Children's Hospital in Spokane. A hospital spokeswoman on Sunday said he was listed in critical but stable condition.

The sheriff's office didn't release details about which child was holding the gun when it fired. Names haven't been released.

Star-spangled banner replica on view in D.C.

WASHINGTON A recreation of the star spangled banner will be unfurled near the White House to mark 200 years since the home was

burned by the British during the War of 1812.

Sunday marked 200 years since the White House was burned on Aug. 24, 1814. To mark the occasion, the replica flag created by the Baltimore based Maryland Historical Society will be displayed at the Ellipse, just south of the White House.

After burning the White House and Washington, the British moved to Baltimore and fought the Battle of Baltimore in September 1814. It was the sight of the flag waving over Baltimore's Fort McHenry after the battle that inspired the writing of the national anthem. The fort's flag, the original star spanned banner, is now on display at the Smithsonian in Washington.

Oglala Sioux leader Gerald One Feather dies

OGLALA, S.D. Gerald One Feather, the legendary Oglala Sioux leader, former tribal president and tireless advocate for educational opportunities, has died. He was 76.

Longtime friend Tom Katus told The Associated Press that One Feather died Thursday at a Rapid City hospital. Katus said One Feather had a massive stroke while on dialysis in Pine Ridge before being taken to the hospital.

One Feather was born in 1938 on the Pine Ridge Indian Reservation, one of the poorest places in America, but rose to become a respected tribal leader in and outside of the reservation. He met with U.S. presidents, spoke on behalf of indigenous people before a United Nations group and helped Native Americans enter higher education.

— Tri-City Herald news services

BREAKING NEWS ONLINE

Local, national and world news 24/7 at www.tricityherald.com.

Washington OKs hunt for wolves killing sheep

ASSOCIATED PRESS

SPOKANE State officials approved the killing of a portion of a wolf pack in northeast Washington, sending hunters aboard a helicopter during the weekend to take aim at the wolves.

Officials from the state Department of Fish and Wildlife approved the killings for the Huckleberry Pack in Stevens County after 22 sheep were killed this month. But a conservation group argues the state did not exhaust non lethal methods before ordering the hunt.

The hunt's announcement came after the state authorized a rancher to shoot the same wolves approaching his flock of 1,800 sheep. The state Fish and Wildlife Department said efforts to deter the pack have failed, The Spokesman Review reported.

In an effort to break the predation cycle, agency Director Phil Anderson said he authorized on Saturday the killing of four wolves from the pack, which is estimated at up to 12 members. Officials will later evaluate whether that is enough lethal force to end the sheep attacks.

Gunners in a helicopter

began flying over the area near hunters on Saturday. One wolf was spotted, but officials said no wolves were killed Saturday. A male wolf is wearing a radio collar that researchers attached to monitor the pack.

"As of Friday, we had confirmed that 17 sheep had been killed by wolves in five separate incidents, and we continue to find more dead and wounded sheep from the flock," said Bruce Botka, agency spokesman.

Botka said the situation meets the state's conditions for lethal removal of wolves, which are protected in Eastern Washington by state endangered species laws. The pack is one of about a dozen on the east side.

"There have been repeated, documented wolf kills; nonlethal methods have not stopped the predation; the attacks are likely to continue, and the livestock owner has not done anything to attract the wolves," he said.

The Huckleberry Pack, named for the nearby Huckleberry Mountains, was documented as a pack in 2012. The pack was not associated with attacks on livestock until this month, officials said

Biologists to re-collar wandering Oregon wolf

MEDFORD, Ore. Biologists plan to recapture and re-collar OR-7, Oregon's famous wandering wolf that is now a settled father of pups.

The Medford Mail Tribune reports that the plan calls for recapturing the male wolf along with his mate and three pups to keep tracking Western Oregon's only known wolf family as they work their way toward pack status.

A federal biologist plans to set foot-hold snares in the area of eastern Jackson County in hopes of capturing at least one of the animals so it can be fitted with a GPS-transmitting collar similar to the one used to track OR-7's 3,000-mile journey that led him here.

OR-7 set off in search of a mate in September 2011, covering thousands of meandering miles from his birthplace in northeastern Oregon to Northern California before settling in southwest Oregon. The wolf gained worldwide fame as his GPS tracking collar showed his wanderings across mountains, deserts and highways.

— Associated Press

Public Comment Period on changes to Hanford Permit for Operations at a Treatment, Storage, and Disposal Unit



The U.S. Department of Energy Richland Operations Office (DOE-RL) is holding a 60-day public comment period on proposed modifications to the Hanford Facility Dangerous Waste Permit. These Class 2 modifications involve changes to the procedure for repairing the basin liners at the Liquid Effluent Retention Facility (LERF) and 200 Area Effluent Treatment Facility (ETF). These updates are necessary to perform needed maintenance repairs while preventing disruption of waste receipts from various Hanford liquid waste generators.

The public comment period will run from August 25, 2014 through October 24, 2014.

DOE-RL and the Washington Department of Ecology want your input to these proposed modifications! Submit comments by October 24, 2014, in writing, by mail, or electronically to:

Rick Bond
Washington State Department of Ecology
3100 Port of Benton Blvd
Richland, WA 99354
Email: Hanford@ecy.wa.gov

The DOE-RL contact person for this permit change is Kris Skopeck, (509) 376-5803. The Washington State Department of Ecology contact person is Andrea Prignano, (509) 372-7950.

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

The permittees' compliance history during the life of the permit being modified is available from the Washington State Department of Ecology contact person.

You are invited to attend a meeting to discuss the proposed permit modification and provide written comments. The meeting is scheduled for:

When: September 15, 2014, 5:30-6:30pm
Where: Richland Public Library
955 Northgate Dr.
Richland, WA 99352

Please e-mail us at CLASPRMTM@rl.gov, if you require special accommodations to participate in the meetings.



TRI-CITY DUST DEVILS

HOMESTAND: AUGUST 25TH - SEPTEMBER 1ST

THURSDAY, AUGUST 28TH

BASEBALL CARD GIVEAWAY
(FIRST 500 FANS THROUGH GATES)

FRIDAY, AUGUST 29TH

SPECIAL JERSEY AUCTION

\$1 FAMILY FEAST NIGHT

SATURDAY, AUGUST 30TH

POST-GAME FIREWORKS

MONDAY, SEPTEMBER 1ST

SEASON FINALE FIREWORKS

COCA-COLA MONDAY

BROUGHT TO YOU BY



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From: [^TPA](#)
To: HANFORD-INFO@LISTSERV.WA.GOV
Subject: Public Comment Period on Proposed Updates to Hazardous Waste Permit for Hanford Site
Date: Monday, August 25, 2014 8:41:14 AM
Attachments: [2014 Class 2 Modifications LERF-ETF liner repairFinal Fact Sheet.pdf](#)

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

Public Comment Period on Proposed Updates to Hazardous Waste Permit for Hanford Site

The U.S. Department of Energy Richland Operations Office (DOE-RL) is holding a 60-day public comment period on proposed modifications to the Hanford Facility Dangerous Waste Permit. These Class 2 modifications involve changes to the procedure for repairing the basin liners at the Liquid Effluent Retention Facility (LERF) and 200 Area Effluent Treatment Facility (ETF). These updates are necessary to perform necessary maintenance while preventing disruption of waste receipt from various Hanford liquid waste generators.

DOE-RL wants your feedback on these proposed modifications. The public comment period will run from **Aug. 25 to Oct. 24, 2014**. A public meeting will be held **Monday, Sept. 15, 5:30 to 6:30 p.m.** at the Richland Public Library.

Proposed changes

This proposed Class 2 modification is for the LERF/ETF Treatment, Storage, and Disposal (TSD) unit in Part III (*Unit Specific Conditions for Final Status Operations*) of Hanford's Dangerous Waste Permit.

This proposed change revises one chapter of the LERF/ETF unit by updating the procedure and methodology for liner repair. Recently, small tears that require repair were noted at the top of a basin at the LERF above the current waste level. The current permit requires the basin to be emptied prior to performing repairs. According to the liner manufacturer, these minor repairs can be performed while the basin is still receiving waste. Emptying the basin prior to performing the repairs would cause a disruption in receiving waste from other Hanford liquid waste generators. The modification would allow repairs to proceed without emptying the basin, and critical waste receiving activities could continue without disruption.

The proposed modifications include one section of the following chapter of the LERF/ETF permit: Chapter 4, Process Information. Changes to the chapter are submitted in red-line strikeout of the permit and presented in an attachment to the permit modification request. Only those changes identified are being submitted for modification and are undergoing public comment.

A red-line strikeout of the current permit versions of the chapter addendum outlining the proposed change was submitted to Ecology with this request. In addition, a temporary authorization request was included in the permit modification request.

A temporary authorization (TA) request is included in this permit modification request to allow for these liner repairs to proceed while the public comment period is held. This will prevent a disruption in waste management activities.

LERF/ETF

The LERF/ETF unit 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 to remove contaminants.

The DOE-RL contact person for this permit change is Kris Skopec, (509) 376-5803. The Washington Department of Ecology contact person is Rick Bond, (509) 372-7950.

The permittees' compliance history during the life of the permit being modified is available from the Washington Department of Ecology contact person.

Copies of the proposed permit modification and supporting documentation are available for review at the public information repositories listed below and on Ecology's website, <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>.

A 60-day public comment period on *proposed Class 2 modifications to Part III of Hanford's Dangerous Waste Permit* will run from **Aug. 25 through Oct. 24, 2014**. A public meeting will be held Sept. 15, 2014, at the Richland Public Library, 955 Northgate Drive in Richland. **Please submit comments by Oct. 24 to:**

Rick Bond
Washington Department of Ecology
3100 Port of Benton Boulevard
Richland, WA 99354
Email: Hanford@ecy.wa.gov

From: [^TPA](#)
To: HANFORD-INFO@LISTSERV.WA.GOV
Subject: TPA Agencies Announce Upcoming Comment Period!
Date: Thursday, July 24, 2014 4:53:53 PM

This is a message from the Tri-Party Agreement Agencies.

Upcoming Public Comment Period on Proposed Permit Modifications for the Liquid Effluent Retention Facility and 200 Area Effluent Treatment 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 revisions, known as Class 2 modifications, involve changes to maintenance activities in the basins at the Liquid Effluent Retention Facility (LERF) and the 200 Area Effluent Treatment Facility (ETF). LERF/ETF, an operating Treatment, Storage, and Disposal (TSD) unit, is a wastewater storage and treatment system located in the 200 East Area (in the center of the Hanford site). These updates include a change to one permit attachment, and are necessary to avoid disruption of ongoing waste management activities at the LERF.

Class 2 modifications apply to periodic updates to the permit, such as response to new regulations, technological advancements, and variations in waste types/quantities. All Class 2 Hanford permit changes require approval from the Washington State Department of Ecology.

The comment period for this modification is expected to begin in August.



Dieter Bohrmann @ecyhanford · Sep 11

Public feedback opportunities abound at #Hanford. 5 comment periods underway now. 1 more starts Monday. [1.usa.gov/1nSG63x](https://www.epa.gov/1nSG63x) #cleanup





Dieter Bohrmann @ecyhanford · Sep 15

Public mtg 5:30 tonight @RichlandLib on changes to part of #Hanford dangerous waste permit. [1.usa.gov/1nSG63x](https://www.1.usa.gov/1nSG63x) #cleanup #nuclear



APPENDIX B: COPIES OF ALL WRITTEN COMMENTS

From: [leah boehm](#)
To: [Hanford \(ECY\)](#)
Subject: comments on Hanford
Date: Tuesday, August 26, 2014 7:27:12 AM

*My comment is this, **I do not think ANY waste should be put in the storage areas UNTIL all cracks in the liner have been fully repaired.***

I think is very unwise to do otherwise.

I also oppose making NEW storage areas and letting NEW waste come into Hanford.

All polluted areas must be cleaned up prior to importing new waste.

Leah boehm brady

From: [Mike](#)
To: [Hanford \(ECY\)](#)
Subject: Public Comment Period re: Dangerous Waste Permit
Date: Saturday, August 30, 2014 7:11:00 PM

Rick Bond:

- 1) remove ALL nuclear waste from Hanford,
- 2) replace all single shell tanks w/quality multi skinned tanks,
- 3) do not allow anymore nuclear waste on to facility.

Mike Conlan
Redmond WA