



September 8, 2020

Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

To Whom It May Concern,

Thank you for the opportunity to submit comments on the *Class 2 Permit Modification for 242-A Evaporator Transfer Line Connection to the LERF Basin 41* and the *Class 3 Permit Modification Construction of Basin 41 at the LERF and 200 Area ETF*.

Hanford Challenge is a non-profit, public interest, environmental and worker advocacy organization located at 2719 East Madison Street, Suite 304, Seattle, WA 98112. Hanford Challenge is an independent 501(c)(3) membership organization incorporated in the State of Washington with a mission to create a future for the Hanford Nuclear Site that secures human health and safety, advances accountability, and promotes a sustainable environmental legacy. Hanford Challenge has members who work at the Hanford Site. Other members of Hanford Challenge work and/or recreate near Hanford, where they may also be affected by hazardous materials emitted into the environment by Hanford. All members have a strong interest in ensuring the safe and effective cleanup of the nation's most toxic nuclear site for themselves and for current and future generations, and who are therefore affected by conditions that endanger human health and the environment.

As the Hanford site ages, we can expect Hanford site facilities to fail and need upgrades and replacements. These two permit modifications underscore these infrastructure needs. For ease, we have written one set of comments for both of the permit modifications and shared them on both of the comment portals.

The safe and effective storage of Hanford's high-level tank waste is essential to the protection of human health and the environment as we wait for safe immobilization of Hanford's high-level tank waste in glass. All facilities that are a part of managing, storing, and treating this waste are a top concern of Hanford Challenge.

Specific Comments include:

- **Increase Transparency and Clarity in Communications:** Permit Modifications are notoriously inaccessible to the public, but this does not need to be the case. In future permit modification public materials like fact sheets and presentations, use plain language to clearly communicate why an action is being taken and how it fits into the bigger picture of ultimate Hanford cleanup goals. For example; long-term plans for

implementing additional upgrades to fix and replace aging infrastructure that is part of tank waste management, storage and treatment.

- **Make Relevant Documents Easier to Navigate and Accessible:** In the future, please provide a summary of which documents are included in each permit modification package for ease of navigation. Please make sure these materials are available and accessible in an easy to navigate format online.
- **Include Chemical Vapor Protections:** Make sure to include requirements that protect workers from chemical vapor exposures at all facilities and related infrastructure that deal with tank waste. This is a legal requirement under existing environmental, health and safety laws, as well as a commitment made by the DOE and contractors in recent legal resolutions.
- **Require Protective Leak Inspections:** Ensure that the timing and rigor of leak detection inspections are not decreased by the permit modifications for both the basins and transfer lines.
- **Plan for Additional Infrastructure Upgrades:** We appreciate efforts to install new transfer lines to transport the condensed vapors from the evaporated tank waste, and have a backup line for the WTP evaporator. It appears that there are more infrastructure upgrades needed. Ensure planning for all necessary infrastructure upgrades, including the three existing LERF basins which have a 20-year design life that expired in 2015.
- **Include Plans for Avoidable Problems:** Ensure that DOE takes action to avoid startup issues at the Effluent Treatment Facility that takes into consideration unknowns such as what the future Waste Treatment Plant effluent may contain and plans for characterization of that effluent. Ensure measures are taken for safe startup of the ETF so this waste may be safely treated onsite.
- **Information Before Approval:** Ensure that additional information about leak detection, expired design life, infrastructure upgrades, and WTP effluent characterization are answered and this information is shared with the public prior to approving these permit modifications.

Thank you for considering our comments.

A handwritten signature in blue ink that reads "Tom Carpenter". The signature is fluid and cursive, with the first name "Tom" and last name "Carpenter" clearly legible.

Tom Carpenter, Executive Director