



October 28, 2021

Comments Submitted Electronically at: <https://nw.ecology.commentinput.com/?id=fKhkj>

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 *Proposed Class 3 Permit Modification for the Integrated Disposal Facility*.

Hanford Challenge is a non-profit, public interest, environmental and worker advocacy organization located in Seattle, WA. Our mailing address is P.O. Box 28989, Seattle, WA 98118. 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.

The safe and effective treatment of Hanford's high-level tank waste is essential to the protection of human health and the environment. All facilities that are a part of managing, storing, and treating Hanford's tank waste are a top concern of Hanford Challenge. We appreciate the work the State of Washington is doing to hold the Department of Energy to its commitments and can see that reflected in the permit conditions for the Integrated Disposal Facility. Thank you.

Though Hanford Challenge in general supports out of the box thinking when it comes to challenges facing Hanford cleanup, we are concerned about the overemphasis on budgetary limitations and how this overemphasis may imbalance cleanup decision-making towards a less protective cleanup that results in more waste being left on the Hanford site. Once again, we appreciate the State using its regulatory authority to ensure that protective remedies are chosen for Hanford tank waste treatment and disposal.

At the time of this writing there continue to be holistic negotiations between the State of Washington and the U.S. Department of Energy that concern the management, treatment and disposal of Hanford's tank waste. These negotiations are closed to encourage open and transparent conversation between the parties. While we appreciate the need for open

conversation, we believe effective and meaningful engagement with the public and open and transparent government to government negotiation with the tribes is an essential part of driving the collective towards a safe and effective cleanup. We are concerned about the lack of open and transparent communication with the broader Hanford community. We would like to see a process that engages the broader Hanford community before any formal agreement is reached during the holistic negotiations.

The future use of IDF is both known and unknown. A concern previously noted by Hanford Challenge and others is an integrated mass balance flow as a single secondary document. A concern for IDF is the uncertainty about what contaminants will ultimately end up in this landfill. We appreciate Ecology's specificity in the permit conditions about the types of waste that are allowed for disposal. We would like to see additional clarity included to prohibit disposal in IDF of any future tank waste treated at Perma-Fix NW. For the record, Perma-Fix NW should not be used to treat Hanford's tank waste.

Hanford Challenge published an investigative report on [Perma-Fix NW in Dec 2020](#)¹ revealing many concerns about safety, lack of worker protections, and lack of compliance. We believe that Hanford waste should be treated on the Hanford site.

The increasing interest in finding ways to grout Hanford's tank waste is concerning to Hanford Challenge. In our opinion, any relabeling of Hanford's tank waste requires NRC's authorization and approval under the Nuclear Waste Policy Act, which is not being sought. We have also documented our grave concerns with the use of grout to immobilize tank waste².

The response to comments document shares an exchange between an anonymous commenter and Ecology in Publication 21-05-21. In the responses, Ecology stated:

"Based on the current process flow, there are no plans to dispose EMF bottoms at IDF. This waste stream is planned to be recycled back into the processes at WTP or sent back to the DSTs. Ecology agrees that grouting of ETF brine or other tank waste derived liquids offsite at Permafix requires NEPA coverage."

We appreciate Ecology's stance, however we share a concern that nothing in the proposed permit prevents transfer of non-approved or non-NEPA covered waste from Permafix to IDF. For example, permit condition III.11.P.2.b refers to "documentation accompanying wastes accepted at the IDF from other on-site DWMUs or any off-site facility. This condition does not restrict

¹ *Risky Business at Perma-Fix Northwest: The Inside Story on Hanford's Off-Site Radioactive Treatment Facility*, Robert Alvarez and Hanford Challenge, December 4, 2020.

<https://static1.squarespace.com/static/568adf4125981deb769d96b2/t/5fce533274a40730fbc928bf/1607357241336/2020+12.04+PermaFix+Report+updated.pdf>

² *Relabeling and Grouting Tank Waste at Hanford: Frequently Asked Questions*, Hanford Challenge, April 2021.

<https://static1.squarespace.com/static/568adf4125981deb769d96b2/t/608c8d11cf966f0ac2885e2f/1619823889391/2021+04.30+FINAL+FAQ+on+reclassification+of+HLW.pdf>

Why Grout Failed at Hanford: Chronology of the Failed Grout Program, Hanford Challenge, June 2021.


<https://static1.squarespace.com/static/568adf4125981deb769d96b2/t/60f9b2bdb9480b7aeb6cbe15/1626976958173/2021+06.15+Why+Grout+Failed+at+Hanford.pdf>

receipts to NEPA covered waste. Brine, bottoms, or other tank waste processed at PFNW could escape detection until disposed.

Addendum A for the updated Part A permit application form states that “shipments of Hanford waste containers from an offsite treatment facility may be temporarily stored on the storage pad before placement in the IDF disposal cells.” This Part A allowed scope is also not specific enough to provide clarity that, at present, there are numerous wastes that will not be accepted at IDF, and particularly several that have been proposed for treatment at the PFNW Facility, which is a Non-DOE facility.

Please make a clarification in the permit conditions that tank waste treated at PFNW is not permitted for disposal at IDF.

Thank you for considering our comments.

A handwritten signature in blue ink that reads "Tom Carpenter". The signature is written in a cursive style with a large, sweeping initial "T".

Tom Carpenter, Executive Director