

Tri-Party Agency Comment Period

M-091 Schedule Change - Cleanup Milestone Change Package

Mixed Low Level Waste (MLLW) & Transuranic Mixed Waste (TRUM)

COMMENT DEADLINE: Wednesday, June 23, 2021

SEND COMMENTS VIA EMAIL TO: M-091@rl.gov

Say What? Comment Guide

The Tri-Party Agencies in charge of cleaning up Hanford are gathering your comments on changes they have proposed for the schedule and deadlines for removing, treating and disposing of two kinds of waste – retrievably stored Mixed Low Level Waste and Transuranic Mixed Waste (TRUM) at Hanford. Mixed Low Level Waste (MLLW) will be disposed at the Hanford site in the Environmental Restoration Disposal Facility, a lined landfill in the center of Hanford site; and Transuranic Mixed Waste will be sent to [New Mexico's Waste Isolation Pilot Plant](#) (WIPP) near Carlsbad, NM.

This comment period is more on the administrative side, changing deadlines to later dates or establishing dates where it previously said “to be determined.” An important piece of information is that this cleanup work relies on negotiations between two states, Washington and New Mexico and two Department of Energy sites, Hanford and the Waste Isolation Pilot Plant. Delays at WIPP impact Hanford’s schedule.

The bottom line is these two types of waste would be removed, characterized to check plutonium levels which determines if the waste is Mixed Low Level Waste or Transuranic Mixed Waste, treated, and disposed by 2050. The updated deadline to start sending transuranic waste to WIPP is 2028. This waste must meet the disposal rules before it can be accepted at WIPP.

There are two kinds of Transuranic Mixed Waste, contact handled and remote handled. As you may have guessed from their names, contact handled is less radioactive and remote handled is more radioactive and has to be more carefully removed and packaged to protect workers. 99% of the Transuranic Mixed Waste (TRUM) would be removed, characterized, treated, and disposed by 2040. This is the contact handled waste. The remaining 1% of the TRUM is the remote handled waste which would be removed, treated, and sent to WIPP for disposal by 2050.

The work to retrieve and treat the Mixed Low Level Waste and Transuranic Mixed Waste is ongoing. The original deadline for removing and treating these wastes was 12 years ago, in 2009.

These changes have been negotiated and agreed to by the three agencies in charge of cleaning up Hanford, the U.S. Department of Energy, the Washington State Department of Ecology, and the Environmental Protection Agency.

The biggest threats from delaying removal of this waste is kicking the can so far down the road the U.S. government never gets to it and deteriorating conditions in the trenches could make removal more dangerous and costly. The upside to some delays is more time for radioactivity to decay which can mean lowered risks to workers.

Generally, Hanford Challenge does not like the trend of kicking the cleanup can down the road, however, we are not opposing these new deadlines. We do have concerns about transparency and the lack of

information provided about the new facility that needs to be designed and built to handle large contaminated equipment and remote handled transuranic mixed waste, and want Hanford's waste treated and packaged on the Hanford site, not offsite at the commercial facility Perma-Fix Northwest¹. Sample comments follow.

Email Comments by midnight PST June 23, 2021 to: M-091@rl.gov

Sample Comments Prepared by Hanford Challenge

To Whom It May Concern,

Thank you for the opportunity to provide public comment on the M-091 Change Package. I am writing because I care about protecting future generations and the environment from Hanford's contamination. I care about worker, public, and environmental safety.

Thank you for considering my comments:

- **Treat Hanford Waste Onsite:** Build out capacity on the Hanford site to treat and package Hanford's waste including the MLLW and TRUM, instead of using Perma-Fix Northwest's offsite commercial facility.
- **Increase Public Involvement and Transparency:** Keep the public informed on progress related to the work scope that is part of this comment period. Keep the issues related to removal of plutonium contaminated waste in the public eye so we can push for adequate funding to make sure this work happens safely and on schedule.
- **Provide Information about Large Contaminated Equipment, Remote Handled TRUM Inventory, and the to be Designed Onsite Treatment Facility:** Share information about DOE's inventory of large contaminated equipment that needs to be removed, how it will be decontaminated, and the capabilities a new facility will need to treat and package large contaminated equipment and remote handled Transuranic Mixed Waste so that this facility is successfully designed, built and ready to go in ten years.
- **Make Sure this Work Happens:** Don't kick the can so far down the road that you never get to it. Ensure that work continues to meet the new deadlines and keep this critical cleanup work in view so that funding is appropriated. It is important to get this work done safely and not forgotten through further delays and competing priorities.

Additional Resources

- [Tri-Party Agency Presentation from the May 2021 Public Meeting](#) – Great place to get an overview of the comment period.
- [Tri-Party Agency Fact Sheet](#) on the Proposed Changes to the M-091 Milestone
- [Hanford Advisory Board Issue Manager Presentation](#) on the Changes – Vince Panesko
- [Hanford Challenge formal comments.](#)

¹For more information about our concerns with Perma-Fix Northwest [read Hanford Challenge investigative report on Perma-Fix Northwest and watch our video summarizing the report.](#)