



July 21, 2021

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

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 Leachate Collection System*. Thank you, also, for holding a virtual public meeting on this comment period on June 24, 2021.

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.

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.

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.

At the time of this writing there are holistic negotiations underway 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 that the holistic negotiation transparency may be at the expense 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. Our concern for IDF is the uncertainty about what contaminants will end up in this landfill that could end up in the leachate collection system and making sure the leachate collection system is safely and effectively able to manage that waste stream.

Specific Comments include:

- **Include a Periodic Review of Assumptions that Cover Bounding Conditions:** As more clarity emerges about waste that will be disposed of in IDF, Hanford Challenge would like Ecology to require a periodic review of assumptions to manage the uncertainty about what waste is expected for disposal in IDF and what contaminants will be collected through the leachate collection system. It is important to ensure the leachate collection system and tanker trucks that will transport the leachate will be adequately and safely equipped to handle the IDF contaminated leachate.
- **Consider Building a Spill Pallet for Truck Route to LERF:** We recognize that this comment period only deals with the cell 1 and 2 to the leachate collection tank and the tank to the truck and does not include the transportation route that will be used to take the contaminated leachate to the Liquid Effluent Retention Facility for storage prior to treatment at the Effluent Treatment Facility. However, we would like to urge the Department of Ecology to consider requiring a spill pallet to be built on the route that will be used to transport the leachate in tanker trucks for environmental protection in the event of tanker truck spills and leaks.

Thank you for considering our comments.

A handwritten signature in blue ink that reads "Tom Carpenter". The signature is written in a cursive, flowing style.

Tom Carpenter, Executive Director