

LERF and ETF Decontamination

U.S. Department of Energy Permit Modification Comment Period

COMMENT DEADLINE: Monday, December 27, 2021

Submit Comments by December 27, 2021 to: [Ecology's Website](#)

Sample Public Comments Prepared by Hanford Challenge

To Whom it May Concern,

Thank you for providing an opportunity to comment on the Permit Modification for the LERF and ETF Decontamination. A transparent, accountable, and safe cleanup is important to me.

1. **Increase Accessibility and Transparency of Public-facing Materials**- *U.S. DOE's virtual public meeting and materials were confusing and explanations were full of jargon and unclear terminology. Please design your meetings to be accessible to the public. Provide clear, plain language explanations including synonyms or multiple descriptions to describe something in basic terminology. The goal of a public meeting is to engage the public and provide a clear explanation of the comment period. (For example: At the meeting on 11/30/21 it took multiple rounds of Q&A to translate and understand what was meant by "decontamination means removing waste codes.")*
2. **Sample the Liquid Waste "Heel" after Decontaminating the Basin**- *A 550,000 gallon heel of liquid waste is left in the LERF Basins after each decontamination cycle. The amount of flushing water is calculated ahead of time to ensure the types of waste are adequately removed. Instead of relying solely on the amount of flushing water, U.S. DOE should also test the heel after cleaning the basin to validate that remaining waste concentrations meet the standard to be able to introduce new types of waste to the basin.*
3. **Don't Send ETF Brine to Perma-Fix NW**- *Brine coming out of ETF is intended for treatment at an authorized dangerous waste facility, which means U.S. DOE could send the brine to Perma-Fix NW. U.S. DOE should identify the facility and verify that the brine is acceptable under the authorized facility's permits. If there is no facility with an active, valid permit, U.S. DOE will have an orphan waste, meaning it has no disposal path. Brine can generate toxic gases, such as ammonia, when it is treated. High concentrations of ammonia pose a fire and explosion hazard, especially in confined spaces. Sending brine*

to Perma-Fix NW, a facility with a history of worker overexposures and safety issues including fires, puts nearby communities at risk and is a major concern.

Sincerely,

[Your Name]