



September 7, 2022

*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 again 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.

At the time of this writing, holistic negotiations concerning the management, treatment, and disposal of Hanford's tank waste continue between the State of Washington (State) and the U.S. Department of Energy (U.S. DOE). The lack of open and transparent communications with the broader Hanford community is concerning. We ask that, before any formal agreement is reached during holistic negotiations, the State and U.S. DOE develop a process that provides meaningful engagement with the public and effective government to government negotiations with the tribal nations.

The public's accessibility to engage in meaningful comment is vital for Hanford cleanup. The difficulty accessing information is an issue that must be addressed. Regardless of our vast experience navigating the State's public comment system, we had difficulties with the red-lined documents because they include multiple revisions in five colors: red, blue, pink, purple, and green. This not only made reading the documents burdensome, but also made knowing which color represented the most recent revision impossible. Ultimately, we had to reach out to the State for an explanation. We ask the State to provide a process that ensures revisions are more clearly presented to the public. We suggest providing the public two versions of the red-lined documents: one with only the most recent revisions open for comment and a second with all the revisions and a color matching key.

We appreciate Ecology's specificity in the permit conditions about the types of waste that are prohibited for disposal (Addendum B, B.1.4). We have previously commented our position that IDF is not an appropriate place to store acetonitrile and that acetonitrile should be destroyed rather than stored. Although acetonitrile is not explicitly listed, we believe it may fall under a prohibited category. We ask the State for clarity on whether acetonitrile is prohibited and if not, then we ask for an explanation as to why acetonitrile is allowed to be stored in IDF rather than destroyed.

Worker health and safety is a cornerstone of Hanford Challenge's work. We ask the State to protect workers in the permit by adding inspections of safety showers (see Addendum I, Table I-1 IDF Inspection Schedule) and more necessary trainings (see Addendum G, Table G-1 Personnel Training).

Response to I-1-1 provides that, "Ecology documented in the Class 3 modification request completeness determination that the leachate collection system does not meet the regulatory definition of WAC 173-303-140 for tanks. [...] The Leachate Collection System will be permitted as miscellaneous units in the IDF RCRA Permit." We ask the State to provide greater explanation on this determination and the decision that followed to classify the tanks as miscellaneous units.

The lack of protection of the air within the permit is concerning. We ask the State to add these protections, perhaps as an amendment to part III.11.E.5.c (groundwater protections).

The removal of III.11.E.5.d, which provides in part that "the uncertainty analysis must be included in all future performance assessments and modeling," is concerning. An uncertainty analysis is an important tool used in the performance assessment to recognize and attempt to account for uncertainties in the future of the facility, site, models, data, and parameters that affect the results of the performance assessment. We ask the State for clarification on this removal and to ensure an uncertainty analysis is required.

We question the removal of parts from III.11.E.8, which generally provided an explanation of how disposal of Waste Treatment Plant Secondary Solid Waste can become authorized via Final Permit

modification decision. We were expecting to find this process elsewhere, but did not. We ask the State for clarity on this removal.

The removal of parts from III.11.E.10 (Modeling–Risk Budgeting Tool) are concerning. The removed parts from III.11.E.10.a and III.11.E.10.a.iv required that Permittees provide to Ecology (1) updated modeling runs; (2) responses on comments and explanations on how those comments will be reflected in further modeling within 120 days; and (3) access to Performance Assessment modeling for the RBT reports. We ask the State for clarification on these removals and to ensure sufficient RBT checks and balances are required.

Relatedly, the removal of the parts discussed in the previous paragraph from III.11.E.10 is further concerning as it is referenced as part of the proviso added to III.11.F.5.d (bolded for emphasis): “grouted waste forms should not be disposed above vitrified waste forms **unless the Permittees can demonstrate in the Risk Budget Tool that commingling of waste types will not impact underlying vadose or groundwater as outlined in Permit Condition III.11.E.10.**” Further, the increasing interest in finding ways to grout Hanford’s tank waste is concerning. We have documented our concerns with the use of grout to immobilize tank waste [1]. We ask the State to remove this addition from the permit and continue to use its authority to ensure the focus of Hanford tank waste cleanup remains on vitrifying Hanford’s tank waste.

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 for considering our comments.



Nikolas Peterson, Executive Director

---

[1] *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>