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March 21, 2019

Daina McFadden  
Washington State Department of Ecology  
3100 Port of Benton Boulevard  
Richland, WA 99354

*Sent via email & e-comment*

**RE: Comment on the Perma-Fix Northwest Expanded Scoping of a State Environmental Policy Act Environmental Impact Statement.**

Dear Ms. McFadden,

Columbia Riverkeeper is a 501(c)(3) nonprofit organization with a mission to protect and restore the Columbia River, from its headwaters to the Pacific Ocean. Since 1989, Riverkeeper and its predecessor organizations have played an active role in educating the public about Hanford, increasing public participation in cleanup decisions, and monitoring and improving cleanup activities at Hanford. On behalf of our 16,000 members in Oregon and Washington, Columbia Riverkeeper offers the following comments on the Perma-Fix Northwest (PFNW) expanded scoping of a state environmental policy act (SEPA) environmental impact statement (EIS), as expanding the operations at PFNW inextricably implicates Hanford.

PFNW operates under a dangerous waste regulations (DWR) permit and currently seeks to renew its permit, originally authorized and issued with an EIS in 1998. The Washington Department of Ecology (Ecology) seeks comments on the scope of the new EIS under SEPA. *RCW 43.21C*. Riverkeeper appreciates the decision to prepare a new EIS for the above-mentioned permit renewal. Ecology's decision to conduct a complete environmental analysis under SEPA to supplement the 1998 EIS both acknowledges that PFNW's updates to facilities and operations has changed over the years and that these updates may adversely impact the environment. While Riverkeeper generally supports a new EIS, our comment includes several considerations that absolutely warrant inclusion in the scope of the new EIS.

SEPA policy encourages "productive and enjoyable harmony between humankind and the environment"; it "promote(s) efforts which will prevent or eliminate damage to the environment or biosphere"; as well as "stimulate the health and welfare of human beings; and enrich the understanding of the ecological systems and natural resources important to the state

and nation.” *RCW 43.21C.010*. Riverkeeper supports a robust scope for the new EIS with a holistic appraisal of environmental impacts. PFNW does not exist in a vacuum, and its permit renewal EIS needs to consider how the expansion fits within the larger picture of Hanford cleanup and decisions concurrently in the works.

The new EIS must identify and consider potential waste that PFNW’s new permit expansion will allow them to accept and treat, including waste from Hanford and other places both domestic and foreign. The EIS must include identification of all potential transportation routes of the potential waste to and from PNFN, including the types and quantities of waste, and conduct full environmental impact analyses. These analyses must include environmental impacts on potentially impacted waterbodies and communities. The scope should identify the communities that the waste streams may pass through and provide notice to them.

PFNW’s activities appear to include a broad array of potential waste types, waste treatment, and routes for waste transport. For example, the Tri-City Herald reports that PFNW is seeking authorization to handle mixed waste (with both radioactive and hazardous contaminants) from a reactor in Mexico. Nuclear Regulatory Commission documents show that PFNW is seeking approvals to import 500 tons of mixed waste shipped via truck from Mexico, use “thermal destruction” techniques to reduce the volume of the material, and return the ash to Mexico.<sup>i</sup> Potential contaminants include Co-60, Sr-90, Nb-94, Ca-113, I-129, E-154, PB-210, and U-235.<sup>ii</sup> Additionally, PFNW announced in 2018 a new initiative to handle sodium waste streams from certain nuclear reactors.<sup>iii</sup> The shipment, storage, and treatment of these varied types of waste pose unique environmental risks that deserve close scrutiny in Ecology’s analysis.

In addition, the new EIS must consider how PFNW’s proposed activities will impact the management of high-level tank waste at Hanford. PFNW is seeking approvals for the Test Bed Initiative, whereby PFNW previously grouted three gallons of Hanford Tank Waste and now seeks permit expansion to treat 2,000 gallons, and potentially more. Ecology must take into account the difference between treating three and 2,000 gallons, and the unlikelihood that these volumes of tank waste will act the same or produce similar risks. PFNW’s proposal to handle high-level tank waste clearly warrants inclusion in the new EIS. We also encourage Ecology to evaluate how other proposals at Hanford and nationally, such as the Waste Incidental to Reprocessing and High-Level Waste redefinition respectively, may impact the scope of the new EIS. The results of these proposals will have drastic impacts on the types, quantities, and new waste streams PFNW’s permit renewal will allow them to accept.

Lastly, the scope of the new EIS must include a no action alternative that looks at whether high-level waste must travel to PFNW at all, as opposed to the vitrification plant in construction at Hanford currently. Ecology and the U.S. Department of Energy have invested intensively in the direct-feed low-activity (DFLAW) system to provide a near-term path to vitrifying waste as soon as late 2021.<sup>iv</sup> In order to fully understand potential adverse

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<sup>i</sup> <https://www.nrc.gov/docs/ML1302/ML13023A193.pdf>

<sup>ii</sup> *Id.*, p. 7 of 10 in pdf.

<sup>iii</sup> <https://ir.perma-fix.com/press-releases/detail/4773/perma-fix-partners-with-veolia-nuclear-solutions-to-expand>

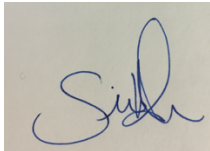
<sup>iv</sup> [https://www.hanford.gov/files.cfm/Final\\_DFLAW\\_Roadmap\\_Presentation\\_COTW\\_4.10.18.pdf](https://www.hanford.gov/files.cfm/Final_DFLAW_Roadmap_Presentation_COTW_4.10.18.pdf)

environmental impacts that may occur as a result of the permit modification, analysis of the difference between grouting waste at PFNW versus vitrifying waste falls within the scope of the EIS.

PFNW's activities have the potential to impact the community near PFNW's facility (which includes multiple child care facilities and schools within 0.5-3 miles of PFNW), the many communities along the routes of potential shipping routes for mixed waste, low-level radioactive waste, and even high-level waste, and the Columbia River itself through waste shipments. Ecology must conduct an EIS whose scope evaluates the long-term risk to soils, groundwater, communities, and the Columbia River from expanding the scope of PNFW's permit renewal. Ecology should not assume that expanding the scope of grouting activities at PNFW provides an acceptable long-term solution to handling nuclear waste. Potentially opening up the northwest to shipments of high-level nuclear waste from around the country and around the world to PFNW will have environmental impacts that the new EIS must evaluate fully.

Thank you for accepting these comments on behalf of Columbia Riverkeeper.

Sincerely,

A handwritten signature in blue ink, appearing to read "Simone", on a light-colored rectangular background.

Simone Anter  
Associate Attorney  
Columbia Riverkeeper