

Alex Smith, Manager  
Nuclear Waste Program  
WA Department of Ecology  
3100 Port of Benton Blvd.  
Richland, WA 99354

RECEIVED  
MAR 13 2019  
Department of Ecology  
NWP - Richland

Dear Ms. Smith:

We (Bob Ferguson and Gary Petersen) are two long-time residents of the Tri-Cities, and each of us have worked in various senior management capacities at Hanford for more than 50 years, assigned to many areas across the Hanford site.

This letter is to provide our support for Ecology's early approval of the expanded scoping proposal in the supplemental EIS for Perma-Fix NW (PFNW). We believe there are NO safety reasons, nor regulatory requirements that should stop the Department of Ecology from granting of this permit.

Early approval is a bit of a misnomer as we recognize that Perma-Fix is operating under the license that was granted by Ecology 21 years ago. As stated in the Tri-City Herald, PFWN applied for renewal in 2009. It is difficult for us to understand how any regulatory permit could take ten years and still counting. The TCHerald article also mentioned that Ecology had held "nearly weekly meetings with Perma-Fix" for the last three years. We believe these meetings were due to the process of working through Ecology's ever-changing requirements for the permit application.

Ecology has apparently had the same difficulty in granting renewal of DOE's Hanford permit, which also has not been renewed during the past ten years.

As shown in the recent life-cycle costs for cleaning up Hanford, every delay costs hundreds of millions of dollars. At current spending rates, Hanford cleanup costs nearly \$7 million/day (\$2.46 billion 2019 annual budget, divided by 365 = \$6.7 million/day). In delaying this permit, Ecology is directly adding major cost increases to Hanford cleanup, to the federal government and to taxpayers. Because of this, Ecology should itself be held accountable for these additional costs, whether by congressional action or by lawsuit.

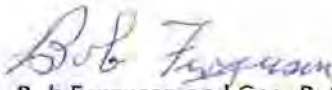
The unusual winter we are still experiencing lends credence to the need to clean up Hanford as soon as possible. We highly commend the Mayors of the Tri-Cities for their support of moving ahead with grouting the Purex tunnels -- against the publicly stated wishes of the Department of Ecology. With this year's heavy snow burden, the largest in more than 100 years, there is no question we need to move ahead with removing LLW from the tank farms, process it, and get it out of the State of Washington. There is no way at this point to know how much of this year's snow melt may get into the aging tunnels and tanks.

We know that waiting for DFLAW and the Waste Treatment Plant to come on line, sometime after 2024; is simply a risk gamble with aging and already leaking tanks. As any geologist can tell you, lots of water, combined with extended freezing conditions over a period of weeks, can damage even rock-solid basalt formations, let alone the 177 tanks that are already well past their design life. Why Ecology would continue to delay a permit that could allow a large portion of the LLW in the tanks to be removed, and processed, years ahead of schedule, and at a 1/10<sup>th</sup> of the cost of the Waste Treatment Plant, is beyond us.

The Washington State Department of Health, the Environmental Protection Agency, and the Federal Nuclear Regulatory Commission, all have indicated that Perma-Fix NW operations are safe, and of no threat to the public. Therefore, why is Ecology doing everything it can to slow Hanford cleanup by not granting this permit which has been underway for more than ten years?

We therefore strongly urge the Department of Ecology to grant the expanded permit to Perma-Fix NW as soon as possible.

Sincerely,



Bob Ferguson and Gary Petersen

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CC:

Governor Jay Inslee  
Senator Patty Murray  
Senator Maria Cantwell  
Representative Dan Newhouse  
Assistant Secretary Anne White  
Maia Bellon, Director, WA State Dept. of Ecology  
Annette Cary, Tri-City Herald