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Department of Ecology  
NWP - Richland

March 16, 2019

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

Dear Ms. McFadden:

Comments below are in response to the public comment period for Perma-Fix Northwest's proposed expanded scoping for a SEPA EIS. Comments are due by March 25<sup>th</sup>.

From what I have read, the proposed scope of the changes that could be evaluated per the SEPA include a pilot test for treating 2,000 gallons of pre-treated Hanford Tank Waste, an industrial scale treatment of up to three million gallons of pre-treated Hanford tank waste, and new commercial waste treatment.

1. With respect to Hanford Tank Waste, Ecology has advocated for many years a specific waste treatment alternative – the “all glass” solution. The proposed SEPA-EIS evaluation suffers from an apparent conflict of interest due to prejudice against grout or other non-glass approaches. Has Ecology considered recusing yourselves, and allowing EPA to take over the Perma-Fix RCRA permit renewal? Ecology's advocacy for a particular solution appears to contradict your role as regulator, which should be limited to ensuring the requirements of environmental law are met.
2. I noticed that the Perma-Fix permit is not available on Ecology's web site, as compared to the Hanford Dangerous Waste Permit. As a result, I had to look for the DOH Air Permit to find a flow diagram.
3. The roads that are adjacent to the Perma-Fix facility do not have generous shoulders, and may need upgrades to handle truck traffic, of which there will be a lot. 3 million gallons at say, 3,000 gallons a tank truck, is 1,000 truck loads.
4. There are nearby food processing, freezer, and other commercial facilities, including ingoing and outgoing trucks that could be impacted by any releases from the Perma-Fix stack.
5. The Air permit for Perma-Fix shows that Perma-Fix has an evaporator and evaporates liquid waste. [Contrary to the air permit, this is a “thermal” process.] How much evaporation will be performed on the Hanford tank waste? Where will the air effluents

go? Where will the liquid condensate go? How much tritium and carbon-14 will be released, that otherwise might have gone to the ETF/SALDS for managed disposal? How does the Perma-fix stack performance compare to the Pretreatment Stack at WTP for this work?

6. Ecology sued DOE in 2006 to make sure the Tank Closure and Waste Management EIS included the entire set of all waste types associated with solid waste disposal and tank closure. The proposed (piecemeal) action to treat *three million gallons* of waste off of the Hanford Site is not part of the TC&WM EIS scope, and appears to circumvent the appropriate NEPA process. Off-Site Treatment of Hanford Tank Waste should be included in a revision to the TC&WM EIS, per the prior settlement agreement approach.

Further, DOE will be creating loaded ion exchange columns *in order to create* the three million gallons of proposed feed to PFNW. These actions are inextricably linked. According to the TC&WM EIS, *the extracted cesium will have to be treated in the WTP.* The problem is that the TC&WM EIS does not evaluate storage, unloading, or vitrification of the newly loaded cesium IX media. This is contrary to what Ecology sued for – to get the *integrated* flow sheet consequences evaluated. The overall risks and benefits, for the whole, closed flowsheet, need to be addressed. DOE anticipates a “new” approach to waste disposal at Hanford. How does this fit in? DOE should not be taking actual steps to implement decisions that are *not yet made*, including prematurely paying via subcontract for any upgrades to handle/evaporate Hanford tank waste.

7. Lastly, treating 3 million gallons of Hanford Tank Waste *in the city of Richland* does not make sense. The Hanford Site was deliberately selected for radiochemical waste storage and processing due to its distance from populations and elevation above the groundwater. Why haul waste into town (which makes both of these conditions worse), when there is already a much better, isolated, location in the 200 Areas that can include both processing and disposal?

As a result, a SEPA-EIS is not appropriate for the *three million* gallons of Hanford Tank Waste that are proposed to be treated, and Ecology should be recused from further work on it.