

From: info@gerrypollet.com
To: [McFadden, Daina \(ECY\)](#); [Carlson, Annette \(ECY\)](#)
Cc: [Gerry Pollet \(HoA\)](#)
Subject: Re: LERF ETF Comment Period - Email from Gerry Pollet
Date: Thursday, November 21, 2019 11:07:09 AM

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Dear Annette and Davina,

I submitted formal comments. They include similar substance, and additional comments. Can you confirm that those were also received and are in the record?

I do believe that it is also appropriate to include the email below requesting the information and extension before the comment period closed.

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On Thu, Nov 21, 2019 at 7:54 AM -0800, "Carlson, Annette (ECY)" <anca461@ecy.wa.gov> wrote:

Hi Gerald,

I will try to give you a call today to touch base on this email message. We would like to include the information in your email message in the Response to Comments document once you have provided confirmation.

Thank you so much,
Annette Carlson

From: McFadden, Daina (ECY) <dmc461@ECY.WA.GOV>
Sent: Monday, November 18, 2019 8:36 AM
To: info@gerrypollet.com
Cc: Carlson, Annette (ECY) <anca461@ecy.wa.gov>
Subject: FW: LERF ETF Comment Period - Email from Gerry Pollet

Mr. Pollet,

We received the following comments and would like to know if this is your formal submittal for the LERF/ETF public comment period. If so, please let me know and I will upload them into the eComments system.

Thank you,

Daina McFadden | Permit Communication Specialist | 509.372.7939 | WA State Dept of Ecology | Nuclear Waste Program

JoLynn,

Susan Leckband and I made several requests for data on waste streams at the October 9 permit meeting regarding LERF and ETF. We have not received that information which is essential for Heart of America NW and others to use in commenting.

I am sending this via a personal email account because there I can't access my work email in this meeting room for some reason. Please reply to the email addresses above. The request below is copied from draft comments, which is why it is in this format:

Heart of America Northwest requests:

a) An extension of the comment period for the permit modification for thirty days from when USDOE provides the information requested at the public meeting held on October 9, 2019 on waste quantities, characteristics, constituents and concentrations to be transferred, stored and processed.

a. Information / data which should have been in the permit modification and a technical fact sheet for the unit(s), and which we requested, include:

i. The annual quantities of dangerous wastes with characteristics to be transferred, stored or treated through the pipelines and facilities;

ii. The quantities and characteristics of batches of wastes to be held in LERF units, including radionuclides (while RCRA and HWMA do not require the listing of radionuclides that are not also a dangerous waste due to toxicity or other characteristics [e.g. radioactive heavy metals such as Uranium], the SEPA analysis of potential impacts must consider the potential significant impacts from generation, release and disposal of those waste elements and their cumulative health or environmental impacts with those from dangerous wastes).

iii. Specifically, please disclose the constituents and concentrations in ???brine??? which was referred to in presentations on October 9 and is the term added to the permit describing wastes to be permitted, e.g., regarding 2025-E containerized wastes to be permitted and stored in addition to dry powder wastes (see, for example, page A.6). Please provide annual quantities and total amounts allowed to be stored.

???Brine??? sounds as if it is a saltwater solution. Indeed, that is its dictionary definition. ???Brine??? is not a defined term pursuant to the dangerous waste rules in WAC 173-303-040. Without disclosure of the contents in the permit and fact sheet, USDOE cannot use this term and Ecology cannot have an undefined term with no limitations and description on dangerous waste constituents.

Use of the term ???brine??? is misleading and not permissible without describing the specific constituents.

Without these disclosures, it is not possible to comment on adequacy of the permit conditions for storage in a facility which is currently permitted only for storage of dry powder.

b. This request includes SEPA analyses, which would require consideration of radioactive constituent impacts in the event of release (including failure of secondary containment) or long-term release or exposures from disposal of the ultimate waste forms in the IDF landfill.

i. There is no linked SEPA analysis and documents in the notice or permit modification transmittal.

Gerry Pollet

info@gerrypollet.com