

From: [Carlson, Annette \(ECY\)](#)
To: [McFadden, Daina \(ECY\)](#); [Temple, John \(ECY\)](#)
Subject: FW: Extension request fw: RE: Requests for info re LERF, ETF permit
Date: Monday, November 18, 2019 9:30:56 AM

FYI—Annette

From: Bradbury, Randy (ECY) <RBRA461@ECY.WA.GOV>
Sent: Monday, November 18, 2019 8:11 AM
To: Carlson, Annette (ECY) <anca461@ecy.wa.gov>; Hall, Katie (ECY) <KAWI461@ECY.WA.GOV>
Cc: Wireman, Ginger (ECY) <GWIR461@ECY.WA.GOV>; Howell, Theresa (ECY) <teho461@ECY.WA.GOV>
Subject: FW: Extension request fw: RE: Requests for info re LERF, ETF permit

FYI

From: Gerry Pollet <gerry@hoanw.org>
Sent: Sunday, November 17, 2019 11:54 AM
To: thowell@ecy.wa.gov; Bradbury, Randy (ECY) <RBRA461@ECY.WA.GOV>; Wireman, Ginger (ECY) <GWIR461@ECY.WA.GOV>
Cc: Heart of America Northwest <office@hoanw.org>
Subject: Extension request fw: RE: Requests for info re LERF, ETF permit

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Theresa, Ginger and Randy,
At the HAB committee meeting, we discussed that USDOE had not provided the information needed for appropriate comment on the permit modification for LERF and ETF, e.g., nature and quantities of wastes to be stored, transferred and processed. In comments, I requested an extension of the comment period. Per message below, JoLynn has passed on the request for information again to others at USDOE. These requests were initially made at the Public Meeting. Ecology should extend the comment period for a reasonable period of time for consideration after the necessary information is provided, or deny the permit modification and require resubmittal with adequate required information. The latter makes sense, as this would allow for this permit modification to be considered at the same time as, or as part of, the Class 3 Modification for related transfer lines from DFLAW to EMF which feeds the waste to LERF. USDOE has made no indication that it will provide the information necessary for review. So, I want to draw this request to your attention, rather than have it only in our formal comments and the informal HAB committee discussion.
Thank you,
Gerry

Gerry Pollet, JD;
Executive Director,
Heart of America Northwest

"The Public's Voice for Hanford Clean-Up"

gerry@hoanw.org

From: "Garcia, JoLynn M" <jolynn_m_garcia@orp.doe.gov>

Sent: Thursday, November 14, 2019 4:39 PM

To: "info@gerrypollet.com" <info@gerrypollet.com>

Cc: "Office at Heart of America" <office@HOANW.org>, "Pollet, Gerry" <gerry@hoanw.org>

Subject: RE: Requests for info re LERF, ETF permit

Hello Gerry,

Per the public comment process, Ecology has the authority regarding public comment period extensions (per the WAC). You will need to submit to Ecology, which I think was included in the Federal Register notice.

Best,

JoLynn

JoLynn M. Garcia

Hanford Office of Communication, DOE

(509) 376-6244 office

(509) 713-4893 cell

Jolynn_M_Garcia@orp.doe.gov

From: Garcia, JoLynn M <jolynn_m_garcia@orp.doe.gov>

Sent: Wednesday, November 13, 2019 1:11 PM

To: Gerry Pollet <info@gerrypollet.com>

Cc: Pollet, Gerry <gerry@hoanw.org>; Office at Heart of America <office@HOANW.org>

Subject: Re: Requests for info re LERF, ETF permit

Thank you, Gerry.

I will get your request to our SMEs and try to obtain responses to your questions.

Thank you,

JoLynn

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From: Gerry Pollet <info@gerrypollet.com>

Sent: Wednesday, November 13, 2019 1:07:14 PM

To: Garcia, JoLynn M <jolynn_m_garcia@orp.doe.gov>

Cc: Pollet, Gerry <gerry@hoanw.org>; Office at Heart of America <office@HOANW.org>

Subject: Requests for info re LERF, ETF permit

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