

March 24, 2020

Washington State Department of Ecology
Attn: Dana McFadden
3100 Port of Benton Blvd.
Richland, WA 99354

Environmental Protection Agency
Attn: Dave Bartus
1200 Sixth Ave., Suite 155
Seattle, WA 98101

Subject: Support of PermaFix Northwest's permit modification for an upgraded in-container mixer

Dear Ms. McFadden and Mr. Bartus:

This letter is to express the Tri-City Development Council's (TRIDEC) support for the proposed permit modification to PermaFix Northwest's (PFNW) Dangerous Waste Permit and TCSA Approval No. WAR 000 10355, as per the Department of Ecology's notification to a Class 2 notice. Our reasons for this position are as follows:

1. PermaFix has facility has served a critically important function in support of the Hanford cleanup mission, as well as to commercial customers, for decades. The PFNW treatment facility is in a highly industrialized part of north Richland, nearly adjacent to the Hanford site. It is in close proximity to other complex nuclear facilities where hazardous materials of all types move regularly and safely. There is no reason to believe the addition of a proven and demonstrated, mature, and well understood grout mixing capability will negatively impact the adjacent businesses or facilities.
2. PermaFix Northwest at one time had a state permitted grout mixing treatment capability at its subject Richland plant. Due to system obsolescence it was retired and decommissioned. Technologies have improved and the system that is a subject of the requested permit is considered state-of-the-art. We have no reason to believe that adding this capability would negatively impact the environment, the safety of the workers or the community. In addition, we are confident that Ecology, EPA and any other relevant enforcement organizations have the capability to provide responsible monitoring and oversight for such a simple and well understood treatment process.
3. The PermaFix requested grout treatment system that is the subject of this permit modification is the standard treatment technique for the vast majority of the mixed low-level waste in the US and the world. It is used in commercial and government applications for the treatment and stabilization of RCRA and low-level radioactive wastes prior to permanent disposal. Again, we have no reason to believe the permitted operation of such a unit at PFNW would in any way cause worker safety or an environmental hazard. Such treatment processes have been demonstrated and are in operation at hundreds of other permitted sites throughout the US and the world.

4. The new mixer is a state-of-the-art system which should improve the mixing and further enhance the safety of mixed low-level waste treatment.

PermaFix is a long-term valuable member of the local business community and the region. The services they provide are important to the cleanup of Hanford as well as addressing environmental issues associated with dispositioning waste from commercial nuclear power plants like the Columbia Nuclear Generating Station. In addition, approval of the requested permit modification strengthens the company's capabilities, provides good jobs and promotes growth of the local work force.

We encourage your agencies to move forward with granting this permit.

Sincerely,



Karl Dye
President/CEO



David Reeploeg
Vice President, Federal Programs