

Washington State Department of Ecology
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Richland, WA, 99354

and

EPA
Dave Bartus
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1200 Sixth Ave, Suite 155
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Subject: Comments to PermaFix Northwest's permit modification for an In-Container Mixer Unit to be located in its waste treatment facility in Richland, Washington

Dear Ms. McFadden and Mr. Bartus:

The purpose of this letter is to provide comments pursuant to the notification issued by Ecology relative to the Class 2 Notice for a proposed permit modification to PermaFix Northwest, Richland, Inc. Dangerous Waste Permit and TCSA Approval No. WAR 0000 10355. The subject notification was dated January 27, 2020, for a comment period from January 24, 2020 to March 24, 2020.

We strongly support Perma Fix's request for a permit modification to include this capability to their waste treatment facility and request that Ecology issue the permit modification as soon as possible. Our reasons for this position are as follows:

1. PermaFix has been safely operating its waste treatment facility in compliance with federal, state and local regulations for decades. The PermaFix treatment facility is in a highly industrialized part of north Richland and nearly adjacent to the Hanford site. It is adjacent 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, well understood grout mixing capability as requested by this permit application will in any way negatively impact the outstanding operational safety and regulatory compliance record of the company nor 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. There is no reason to believe nor are there any known industrial examples where such a process technology would in any way negatively impact the environment, the safety of the workers or the community. The state regulators and enforcement organizations certainly know how to provide monitoring and oversight for such a simple and well understood treatment process. We know this to be true since they previously performed such oversight at Perma Fix when a similar treatment mixer was in operation in the past.

3. The Perma Fix 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, there is no reason to believe the permitted operation of such a unit at PermaFix Northwest 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. 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. Approval of the requested permit modification strengthens the company's business offerings, provides for good wage jobs and promotes growth of the local work force. The agencies of the state of Washington and the Federal government should support and encourage businesses to invest and provide needed services in a safe and environmentally compliant manner. It should be the job of regulatory agencies to grant permits then provide proper oversight through its enforcement organizations to ensure the company remains in compliance with regulatory requirements. It is not the responsibility of the state to determine which commercial businesses should continue to operate and what services the businesses should provide. That should be market driven.

As community residents, we have confidence in the state and federal agencies' ability to regulate such a simple and well understood waste treatment process as the In-Container Mixer at PermaFix Northwest. Based on the comments and reasons provided above, we encourage the Washington State Department of Ecology and the EPA to move forward as soon as possible with the issuance of the subject permit modification.

Respectfully submitted for your consideration