

Robert Ferguson

Daina McFadden
Washington State Department of Ecology
3100 Port of Benton Blvd.
Richland, WA 99354

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

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

Dear Ms. McFadden and Mr. Bartus,
I am writing in support of 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.

My comments are based on a thorough understanding of the PFNW's operation, processes, and equipment, as founder of PermaFix Northwest's predecessor company and service on its board of directors for many years.

PFNW urgently needs this permit modification to continue its commercial treatment of mixed low-level waste at the Hanford Site. The upgraded in-container mixer will improve the mixing process and make treatment of mixed low-level waste safer, faster, and more cost-effective. The grout treatment system already is used as the standard treatment technique for the majority of mixed low-level waste across the United States and the world, and it is essential to accelerating the cleanup of waste at Hanford.

PFNW has been a key contributor to the Hanford cleanup effort and a responsible member of the Tri-Cities business community, operating safely and consistently for decades. There is no reason not to approve the permit modification that will allow PFNW to cost-effectively treat and dispose of a significant volume of the nation's mixed low-level waste.

I have more than 50 years' experience in the nuclear field, a good portion of that time spent at the Hanford Site directing construction of the Fast Flux Test Facility and the Columbia Generating Station. I also was one of three Tri-Cities business leaders who sued the U.S. government, the Department of Energy, and the Nuclear Regulatory Commission for unlawfully shutting down the Yucca Mountain Project, which was designated to dispose of Hanford's high-level radioactive waste. We won that case in a landmark decision in 2013; however, continued political roadblocks make it unlikely that a repository will ever be built at Yucca Mountain.

Therefore, other methods for treatment and disposal such as PFNW has been using and improving are available and ready for operation if the modification to PFNW's Dangerous Waste Permit can be acquired.

As founder of a new non-profit organization, Northwest Energy Associates doing business as Clean Up Hanford Now, I am committed to making sure that the legacy of nuclear waste from Cold War nuclear weapons manufacturing is finally cleaned up using the safest, fastest, and most cost-effective methods available. I consider PFNW's new mixer and treatment process to be an essential for achieving Hanford's cleanup goal.

The science behind PFNW's mixer is sound and the process is effective. I urge your agencies to grant this permit immediately.

Robert L. Ferguson,
former U.S. Department of Energy Assistant Secretary for Nuclear Programs, former CEO for the Washington Public Power Supply System, former President of Tri-City Development Council, and current founder of Northwest Energy Associates/Clean Up Hanford Now