



July 7, 2020

Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

To Whom It May Concern,

Thank you for the opportunity to submit comments on the *242-A Evaporator Class 2 Permit Modification for Three New Wall Penetrations in the 242-A Evaporator Facility*.

Hanford Challenge is a non-profit, public interest, environmental and worker advocacy organization located at 2719 East Madison Street, Suite 304, Seattle, WA 98112. Hanford Challenge is an independent 501(c)(3) membership organization incorporated in the State of Washington with a mission to create a future for the Hanford Nuclear Site that secures human health and safety, advances accountability, and promotes a sustainable environmental legacy. Hanford Challenge has members who work at the Hanford Site. Other members of Hanford Challenge work and/or recreate near Hanford, where they may also be affected by hazardous materials emitted into the environment by Hanford. All members have a strong interest in ensuring the safe and effective cleanup of the nation's most toxic nuclear site for themselves and for current and future generations, and who are therefore affected by conditions that endanger human health and the environment.

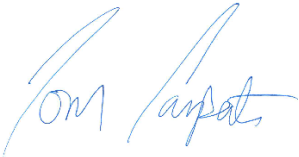
As the Hanford site ages, we can expect Hanford site facilities to fail and need upgrades and replacements. The 242-A Evaporator is one of the facilities that concerns Hanford Challenge. It will be needed for at least 40 more years to concentrate tank waste as part of the tank waste treatment mission and it is already 43 years old. The safe and effective storage of Hanford's high-level tank waste is essential to the protection of human health and the environment as we wait for safe immobilization of Hanford's high-level tank waste in glass.

- **Increase Transparency and Clarity in Communications:** We appreciate efforts to install new transfer lines to the 242-A Evaporator to increase safety following the failed pneumatic pressure test for SL-167 in 2018 and signs of corrosion in SL-168, however this work/rationale was not front and center in the materials provided for the 242-A Permit Modification for the three new wall penetrations for these new transfer lines. Permit Modifications are notoriously inaccessible to the public, but this does not need to be the case. In future permit modification public materials like fact sheets and presentations use plain language to clearly communicate why an action is being taken and how it fits into the bigger picture of ultimate Hanford cleanup goals.
- **Make Relevant Documents Easier to Navigate:** In the future, please provide a summary of which documents are included in a permit modification package for ease of

navigation. The 2,046 page permit modification package for 242-A would have been easier to navigate had the page numbers been available, or a separate link for each document included in the package. The presentation provided at the public meeting was also not available on the Hanford.gov website until it was requested. Please make sure these materials are available and accessible in an easy to navigate format online.

- **Include Chemical Vapor Protections:** Make sure to include requirements that protect workers from chemical vapor exposure at the 242-A evaporator. This is a legal requirement under existing environmental, health and safety laws, as well as a commitment made by the DOE and contractors in recent legal resolutions.
- **Make a Long-Term Plan for the Work of Evaporating Tank Waste:** Hanford Challenge would like to see the Department of Energy make plans or provide plans already in place to ensure the work of the 242-A Evaporator continues safely over the next 40+ years that it will be needed to make space in the tanks, during the tank waste treatment mission. Assess the cost of repairs and upgrades as well as the cost of building a new evaporator.

Thank you for considering our comments.

A handwritten signature in blue ink that reads "Tom Carpenter". The signature is written in a cursive, flowing style.

Tom Carpenter, Executive Director