

Peter von Christierson

Require Protective Leak Inspections: Ensure that the timing and rigor of leak detection inspections are not decreased by the permit modification.

Plan for Infrastructure Upgrades: Ensure planning for all necessary infrastructure upgrades, including the three existing LERF basins which have a 20-year design life that expired in 2015.

Include Plans for Avoidable Problems: Ensure that DOE takes action to avoid startup issues at the Effluent Treatment Facility that takes into consideration unknowns such as what the future Waste Treatment Plant effluent may contain. Ensure measures are taken to avoid impacts to ongoing and future site cleanup activities.

Information Before Approval: Ensure that additional information about leak detection, expired design life, infrastructure upgrades, and WTP effluent characterization are answered and this information is shared with the public prior to approving these permit modifications.

Prioritize Safety: Make sure requirements are in place to protect workers and the environment from the radioactive waste and toxic chemical vapors that may be present in the waste that will be moved through the new transfer lines and stored in the basins.

Increase Transparency: Share the details of the proposed actions AND any problems underpinning that action and the timeline for fixing problems.

Share the Big Picture: When you are soliciting input on anything that deals with treating tank waste, share the big picture of where the facility or action fits with immobilizing Hanford's high-level tank waste in glass. For example long-term plans for implementing additional upgrades to fix and replace additional aging infrastructure that is part of tank waste management, storage and treatment.

Sincerely

Peter von Christierson