

Jim Thomas

I appreciate this opportunity to submit comments on the effluent transfer lines. As someone who has studied Hanford's waste issues since 1986, I am very concerned about protecting future generations and the environment. Thank you for considering my comments:

If I understood the information provided at the August 18 public meeting, the PC-5000 will be used as a backup to the WTP primary transfer line. Since the primary line is 4 inches in diameter, then why is the proposed PC-5000 only 3 inches in diameter? This seems that the smaller capacity could cause process backups in the WTP. Ecology should verify that a smaller transfer line will not cause safety or environmental problems before granting this and the LERF permits.

The Department of Ecology should ensure USDOE adequately plans for all necessary infrastructure upgrades, including the three existing LERF basins which have a 20-year design life that expired in 2015.

Ecology should require USDOE to install more robust leak detection. Strict legal compliance with RCRA is insufficient given the sordid history of Hanford's dumping a variety of wastes directly to the soil through the site but especially in the 200 Areas.

Requirements must be made more stringent 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 LERF basins.

While I have appreciated this public comment process, the August public meeting was hard to follow at times because there was insufficient attention paid to the big picture of where the facility or action fits with vitrifying Hanford's high-level tank waste. For example, the presentation should have provided the context of the long-term plans for implementing additional upgrades to replace additional aging infrastructure that is part of tank waste management, storage and treatment.

In peace,
Jim Thomas