

July 7, 2021

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

RECEIVED
JUL 12 2021

Department of Ecology
NWP - Richland

Dear Ms. McFadden:

Following are comments regarding the current comment period for the Low Activity Waste Pretreatment System (LAWPS) on the Hanford Site. The proposed draft permit modification revises and updates the Operating Unit Group (OUG) 1, Low-Activity Waste Pretreatment System (LAWPS), in Part III of the Hanford Site-wide Permit, with operating and maintenance details and completes Interim Compliance (IC) Schedule Item, LAWPS-1. Comments are due by August 12, 2021.

1. OPERATING CONDITIONS.

Page "Conditions.4" states that "Dangerous and/or mixed waste may be transferred from DWMUs within the LAWPS OUG to an on-site DWMU or an off-site permitted Treatment, Storage, or Disposal Facility..."

This statement could be interpreted to allow treatment of pre-treated tank waste at Perma-Fix Northwest (PFNW) inside the City of Richland. PFWN has an expired permit, an out of date EIS, a poor safety record, and is only just feet above the water table, as compared to hundreds of feet in the 200 areas. Please do not allow transfer of any of the LAWPS related tank waste to PFWN, even as a "treatability test." Such tests have been used as an open ended exception to Ecology's regulations. Tank waste and its derivatives should be treated on-site, as a risk management measure and to protect the public health.

2. ORPHAN WASTE DISPOSAL.

TPA change control form M-62-21-02 establishes milestone M-062-60, which requires a disposition pathways evaluation for the Cs-137 loaded Ion Exchange Columns to be produced by the LAWPS processes. Until a disposal pathway is found, this waste is an orphan that allows construction and operations without an entire mission definition. I would appreciate if the disposition pathway report could be accelerated, so that the costs and risks are known. An endless series of reports seems to be a waste of money.

3. INTEGRATED FLOW SHEET.

There has been no integrated flow sheet to show the impacts of the LAWPS and DFLAW operations. Ecology accepted DOE's excuses for not actually performing TPA milestone M-062-50 work scope in favor of work to be done "later," which is a quality assurance violation. How much more waste is produced over what was baseline WTP operations? More liquid added, more and different air emissions? More sodium hydroxide added to make even more glass? I would appreciate if Ecology could obtain and publish the Integrated Flowsheets that DOE has sponsored and published so far, and any new ones that completed. These reports are:

RPP-RPT-57991, One System: Tank Waste Disposition Integrated Flowsheet – River Protection Project Reference Integrated Flowsheet Rev 0, 2014;

RPP-RPT-57991 "One System River Protection Project Integrated Flowsheet;" Rev 1, 2015;

RPP-RPT-57991 One System River Protection Project Integrated Flowsheet;" Rev 2, 2017; and

RPP-RPT-57991 "River Protection Project Integrated Flowsheet;" Rev 3, 2019.

This will help to answer questions about how the LAWPS process is affecting overall risks and costs.

Thank you for considering these comments.