

Steven Gary

Dear WA State Department of Ecology Hanford Nuclear Site,

Thank you for the opportunity to provide comments on the Class 2 Permit Modification to LERF and ETF on Acetonitrile. I am writing because I care about efforts to protect human and environmental health. Thank you for considering my comments:

CREATE A SOLUTION THAT DESTROYS ACETONITRILE INSTEAD OF CONCENTRATING IT:

Due to Acetonitrile's flammability, explosion risk, and hazard in low concentrations to workers, please create a solution that destroys acetonitrile instead of concentrating it into a liquid that then requires treatment and disposal.

PROTECT WORKERS FROM ACETONITRILE VAPOR HAZARDS:

More robust worker protections are needed including training on the hazard and appropriate emergency response measures; clean, compliant, fit-tested, and functional personal protective equipment, such as respirators and supplied air; real-time monitoring of acetonitrile at the point of generation and anywhere the acetonitrile is present; and alarm systems at the Low-Activity Waste facility, Effluent Management Facility, and at the Effluent Treatment Facility to ensure that workers are protected.

DON'T SEND ACETONITRILE TO PERMA-FIX NORTHWEST FOR TREATMENT:

Perma-Fix NW appears in documents related to the ETF Steam Stripper project as one of the potential treatment locations for treatment of acetonitrile distillate. Perma-Fix NW has off-gas stacks and groundwater within the Richland city limits, where residential communities are potentially impacted from releases. Perma-Fix NW is not a facility that should be under consideration for treating acetonitrile distillate.

DON'T BURY GROUTED ACETONITRILE AT THE INTEGRATED DISPOSAL FACILITY (IDF):

As we understand it, acetonitrile is often explosive and is flammable. Due to these risks, this waste should not be grouted in a concentrated form for disposal on the Hanford site at IDF. It would be better to destroy the acetonitrile, rather than bury it at IDF where it could potentially start an underground fire.

Sincerely,
Steven Gary