

March 18, 2024

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

RECEIVED

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Department of Ecology
NWP - Richland

Dear Ms. McFadden:

Following are comments on the draft Test Bed Initiative (TBI) RD&D Permit. Comments are due by April 25, 2024.

I appreciate that the Fact Sheet clearly identifies that both grouting and disposal will occur at permitted facilities outside the state of Washington. Despite Ecology's concerns, the previous 3-gallon TBI test occurred without any public comment allowed. Yet DOE performed grouting at Perma-Fix Northwest (PFNW) inside the City of Richland. Further, the DOE Environmental Assessment (EA) associated with the TBI, which also included using PFNW, was similarly published without any public comment allowed. Ecology had asked for more public involvement in letters 21-NWP-140 and 21-NWP-145, and Ecology was ignored by DOE. I am grateful to have the opportunity to comment today.

Ecology has stated that a SEPA analysis is needed for stabilization of both ETF brine and Test Bed Initiative waste (if performed at PFNW). As no SEPA has been prepared or issued for public review, use of PFNW is inappropriate for either waste. That the current 2,000 gallons will go elsewhere is a good idea. I continue to be concerned that PFNW is advertising that they will double their facility's capacity (near my home and 10 feet above the water table) in order to accept more liquid DOE waste¹. Further, DOE is basing System Plan Rev 10 costs on assuming PFNW to be the location of supplemental tank waste treatment². This is an unverified assumption that PFNW is using to encourage investors, yet it has no basis in the current DW permit or SEIS. System Plan 10 does not include PFNW permitting support costs, so this is an overly optimistic assumption.

DOT totes should not be opened at PFNW, which is 10 ft above the City of Richland water table. My concern is that this RD&D permit should not be used to promote further liquid waste treatment at PFNW. DOE should provide onsite grouting for treated liquid waste, far above the water table, and away from homes and businesses.

¹ <https://finance.yahoo.com/news/perma-fix-environmental-services-inc-133931791.html>

² <https://pdw.hanford.gov/document/AR-27710>