



Miya Burke &lt;miyab@hanfordchallenge.org&gt;

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**2,000-Gallon Test Bed Initiative Draft RD&D Permit**

1 message

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**Howard Brous** <howard@everyactioncustom.com>

Tue, Apr 16, 2024 at 8:27 AM

Reply-To: howard@brous.com

To: miyab@hanfordchallenge.org

Dear To Whom It May Concern,

Thank you for the opportunity to provide comments on the 2,000 gallon Test Bed Initiative Draft RD&D permit.

- ENSURE TOXIC VAPOR PROTECTIONS: Ensure that permit conditions require protection for workers from toxic chemical vapor exposure consistent with the terms and conditions of the Vapor Lawsuit Settlement Agreement.

- ADD DETAIL ABOUT DISPOSITION PLAN FOR BOUNCE-BACK WASTE: Add detail to the permit about the disposition plan Ecology is requiring USDOE to provide in the event that waste that was shipped to the offsite facilities is sent back to Hanford.

- CLARIFY SAMPLING PROCEDURE: Clarify the language in the permit about whether it is one discrete sample per tote or two 250 ml samples per tote (and four 250ml samples for the final tote filled).

- IMPROVE THE PUBLIC PROCESS: In the future, please provide a high-level overview of the cleanup work the administrative tool (permit) is planned to facilitate and how that tool protects the environment, workers, and the public, instead of overly focusing on the administrative tool itself. Please set an expectation that USDOE and contractor staff are available to provide answers to questions instead of directing attendees to submit their questions as a comment. Questions are meant to help attendees understand the issue so they can write informed comments. How are attendees supposed to write informed comments to influence the decision-making process if that information is not provided? Please note that answers do not need to be highly technical, but rather provide clarity in plain language about the work being planned, not just the administrative framework in which that work takes place.

- CLARIFY CONSENT-BASED PROCESS: Require an attachment to the permit that includes information about how consent has been achieved for offsite disposal and transportation routes.

- KEEP THE FOCUS ON VIT: Grout does not meet the "as-good-as-glass" criteria. Please keep the focus on vitrifying tank waste and wait to press go on any alternative tank waste immobilization forms that do not meet the "as-good-as-glass" criteria.

Thank you for considering my comment.

Sincerely,

Howard Brous

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