

August 29, 2024

CD-2024-180

Washington State Department of Ecology
3100 Port of Benton Blvd.
Richland, WA 99354

Subject: Comments on changes to the Holistic Agreement on Cleanup of Hanford Site Tank Waste

EnergySolutions, LLC is pleased to comment on the changes to the Holistic Agreement on Cleanup of Hanford Site Tank Waste posted on May 30, 2024. The revision provides several new and revised cleanup deadlines. Commercial processing of tank waste will greatly increase the probability of meeting the milestones and deadlines within the revised agreement. EnergySolutions is uniquely qualified to provide that service to the Hanford cleanup project.

EnergySolutions comments are specific to Attachment M, Change Number M-62-24-04, *Establish New TPA Milestones to Create Alternative Treatment Capacity for LAW for 200 West Area SSTs*. The modifications within this change number (M-062-64, M-062-65, and M-062-66) all describe waste being grouted on-site with the grouted waste disposed outside of the Hanford Nuclear Reservation (outside the state of Washington). The modifications are also concerned with a backlog of grouted waste awaiting shipment to an approved disposal facility. An alternative that is not addressed in the revised agreement is for liquid waste to be shipped off-site for grouting and disposal at an approved facility. This alternative would be beneficial to meet milestones since proven, commercial infrastructure serving the DOE is already in place to perform this treatment and could begin immediately. It would also solve the backlog of grouted waste on-site issue, as well as the existing lack of tank space for wastes being processed out of the Tank Side Cesium Removal system, and truly begin the process of reducing waste on site.

The EnergySolutions Clive Facility in Utah has the infrastructure in place and has over 30 years of experience successfully treating contaminated liquids to meet Land Disposal Restriction standards and disposes the grouted residue in an on-site permitted mixed waste embankment. Although not to treatment capacity, the EnergySolutions Clive facility has managed (stabilized/solidified) approximately 700,000 gallons of liquid waste from 200 shipments over the last five years with radiological characteristics consistent with the intended Hanford wastes. Further, the facility has a current campaign with two DOE sites that have shipped approximately 150,000 gallons of similarly characterized water in 32 tanker shipments over the last six months. Over the course of liquid treatment at the Clive facility, there has never been a transportation incident from a liquid tanker shipment. Additionally, tankers of hazardous and radioactive liquids with similar constituencies containing upwards of 500,000 gallons annually are routinely transported into and through the state of Washington.



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Liquid waste can be safely transported using existing methods and equipment and in fact is currently being done constantly. EnergySolutions feels the addition of off-site liquid shipments into the holistic agreement would allow more flexibility and efficiency and help meet or even exceed the agreement milestones and deadlines.

Should there be any questions regarding these comments and information, contact me at 865-220-1413.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Heckman", with a long horizontal flourish extending to the right.

Joe Heckman
President, Waste Management
EnergySolutions