

## Richard Bloom

Comment to proposed change to III.1.O.1.b and III.1.O.1.d.

The proposed change requires replacement of the HIHTL with a hard walled transfer line rather than simply replacing the HIHTL with a new HIHTL.

Considering the experience to date with HIHTLs, unless it can be shown that moving to hard walled transfer lines is cost effective vs in-kind replacement, requiring hard walled transfer lines should not be required. Hard walled transfer lines are expensive to install and maintain, requiring extensive surveillance, and have failed numerous times on the Hanford site.

I feel the addition of the requirement for hard walled transfer lines is not justified and should not be included in the permit change.