



March 31, 2025

Comments Submitted Electronically at:
<https://nw.ecology.commentinput.com/?id=Jx2NYMS7ap>

Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

RE: Perma-Fix Northwest Draft Permit Renewal

To Whom It May Concern:

Thank you for the opportunity to submit comments on the Perma-Fix Northwest Draft Permit Renewal.

Hanford Challenge is a non-profit, public interest, environmental, and worker advocacy organization located in Seattle, WA. We are an independent 501(c)(3) organization incorporated in the State of Washington since 2008 and registered in Oregon. Our mission is to create a future for the Hanford Nuclear Site that secures human health and safety, advances accountability, and promotes a sustainable environmental legacy.

Hanford Challenge has members who work at the Hanford Site. Other members of Hanford Challenge work and/or recreate near Hanford, where they may also be affected by hazardous materials emitted into the environment by Hanford. All members have a strong interest in ensuring the safe and effective cleanup of the nation's most toxic nuclear site for current and future generations, and who are therefore affected by conditions that endanger human health and the environment.

We recognize the importance of ensuring that facilities handling dangerous and mixed waste operate under stringent regulations to protect public health and the environment. However, we have several concerns and issues that we believe must be addressed in the final permit.

First, the draft permit renewal lacks sufficient detail on the measures Perma-Fix Northwest (PFNW) will implement to prevent and mitigate potential releases of hazardous substances. Given the facility's history and the nature of the waste it handles, it is crucial that the permit includes robust and specific requirements for spill prevention, emergency response, and contamination control. We urge the Washington state Department of Ecology (Ecology) to

mandate comprehensive and transparent plans that detail how PFNW will address these critical areas.

Second, we are concerned about the adequacy of the monitoring and reporting requirements outlined in the draft permit. Continuous and rigorous monitoring is essential to ensure compliance with environmental standards and to detect any deviations promptly. The permit should specify more frequent and detailed monitoring protocols, including real-time data reporting and public accessibility to monitoring results. This transparency is vital for maintaining public trust and ensuring that any issues are swiftly identified and addressed.

Additionally, the draft permit does not sufficiently address the cumulative impacts of PFNW's operations on the surrounding community and environment. The facility's proximity to residential areas and sensitive ecosystems necessitates a thorough assessment of potential long-term impacts.

The following are a few other specific comments on the documents included as part of this public comment period:

Focus Sheet. The Focus Sheet says that the proposed permit only updates the treatment units that are already in place and working. This update is based on the permit first issued in 1999. We would appreciate it if Ecology could make the current version of the 1999 permit available on its website. Without redline/strikeout changes in the review files, it is hard to understand what updates have been made for the permit renewal.

Quality Assurance. In 2020, the Washington Department of Health (DOH) had three licenses for PFNW and PFNW frequently requests higher limits for these licenses. It appears that at least on one occasion, DOH caught an error in which PFNW submitted a request that would have allowed PFNW to exceed the proposed limit by thousands of times. We mention this to make sure that Ecology checks PFNW's math, calculations, data, etc.

Conflict of Interest? PFNW has struggled for years to submit a compliant application. Their applications in 2009, 2011, and 2015 were all found deficient by Ecology. From 2015 to 2018, Ecology reportedly worked with PFNW almost every week to help them through the process. How many hours did Ecology spend assisting PFNW to get the application to its current state? Did these meetings continue after 2018? How much of the application was drafted by PFNW versus Ecology? This situation raises concerns about a potential conflict of interest for Ecology. We recommend that a neutral third party review this application drafting process between Ecology and PFNW.

Local Emergency Plan. There is reference to a "local emergency plan" in the documents, but we could not locate the actual local emergency plan. Could Ecology please provide this plan or explain where it can be found?

Stop Work Authority. We appreciate the inclusion of the stop work authority in the Quality Assurance Plan. This provision is crucial for ensuring safety and compliance. However, we

would like to know more about the specific criteria and processes for invoking this authority. Are there any punishments or fines for retaliating against an employee for using this stop work authority? How often has it been used in the past, if at all?

Contracted Laboratories. The plan mentions the use of contracted laboratories for various analyses. It is important to ensure that these laboratories are selected through a rigorous and transparent process. Which labs will be selected? Who owns the labs? Are they checked for any conflicts of interest? We would like to see more details on the criteria used for selecting these laboratories and the oversight mechanisms in place to ensure their compliance with quality standards.

In conclusion, it is imperative that the final permit incorporates stronger safeguards, enhanced monitoring, and a thorough evaluation of cumulative impacts. Hanford Challenge remains committed to advocating for the highest standards of environmental protection and public health, and we look forward to continued engagement on this important issue.

Thank you for considering our comments.

A handwritten signature in blue ink that reads "Nikolas F. Peterson". The signature is written in a cursive, slightly slanted style.

Nikolas Peterson, Executive Director