



March 31, 2025

Comments Submitted Electronically at: <https://nw.ecology.commentinput.com/?id=4jW75ZF9Y>

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

RE: Public Comment Period for Draft Supplemental Environmental Impact Statement for the Perma-Fix Northwest draft permit renewal

To Whom It May Concern:

Thank you for the opportunity to submit comments on the Draft Supplemental Environmental Impact Statement for the Perma-Fix Northwest draft permit renewal. We appreciate Washington State Department of Ecology's (Ecology) efforts to share information about the Draft SEIS in a public meeting on March 19, 2025. We also appreciate that Ecology scheduled a public meeting for this public comment period and granted an extension in response to requests.

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.

Currently, Hanford Challenge supports treating Hanford's waste onsite. Some of our concerns stem from performing this work at an offsite commercial facility rather than an onsite facility. These issues include reduced security, a less trained workforce, fewer regulations, the need to transport waste offsite for treatment, and the proximity to a rapidly growing population area. Essentially, there is less accountability at Perma-Fix Northwest compared to if the same facility, even operated by the same personnel and company, were located on the Hanford site.

However, Hanford Challenge understands that offsite treatment may be unavoidable. Therefore, if waste must be sent offsite for treatment, additional safeguards should be implemented to ensure the safest operation possible. Our hope is that this public comment period will result in implementing those

types of safeguards. We also strongly encourage the Department of Energy to develop this treatment capacity on the Hanford Site where risks associated with this task would be greatly reduced.

This SEIS Draft is a crucial tool for Washington state to implement safeguards and conditions to mitigate the potential dangers of a commercial facility treating Hanford's waste in the City of Richland. The facility poses risks of soil contamination and water pollution, and it could also negatively impact local air quality and biodiversity. By highlighting these concerns, we aim to ensure that the permit comprehensively addresses these cumulative impacts and establishes a robust long-term monitoring program to mitigate them.

Incidents/Fires:

- **Additional Incidents:** The SEIS draft only mentions the two fires in 2019 reported by Hanford Challenge in our 2020 report, [Risky Business at Perma-Fix Northwest](#). Are there any other incidents, such as fires, that should be included in this document? Any other incidents that the public should be aware of? Transparency about all incidents is crucial for public trust.
 - Hanford Challenge knows of at least one other fire at or near the facility that occurred since 2019 where the fire department was called, let onsite, and needed to get through gates. Why was this fire not included in the discussion about fires in the draft SEIS?
 - The public was also made aware of another fire at PFNW during the public meeting held on March 19, 2025.

Security at the Site:

- **Guard Duty:** There should be more discussion of site security in the SEIS Draft. What are the current, or future, security requirements for Perma-Fix Northwest? Have there been any security lapses at the facility? How many guards are onsite at a time? What training requirements, if any, must they meet? How many, if any, security cameras do they have access to help them secure the site? Adequate security measures, including multiple guards, should be implemented to ensure site safety. We understand that this information may not be available to the public due to the sensitive nature of security, but we urge Ecology to do what is in their power to ensure robust site security.

Increase in Population and Traffic Near PFNW:

- **Traffic Growth:** The SEIS draft should consider the increase in population and traffic near PFNW since 1998. This growth can impact emergency response times and overall site safety. More updated traffic and population data should be included to reflect current conditions.
- **Future Growth:** Has the City of Richland been specifically asked to submit public comments at least regarding the current and future expansion of the City of Richland towards Perma-Fix Northwest?
- **Outdated Maps:** The maps in the document, such as the one on page 4, figure 2, are outdated. They do not include new developments like a 280-unit apartment complex, sports facility, restaurants, a dog training facility, etc. Updated maps should be provided to accurately reflect the current land use and developments. How can the alternatives be adequately evaluated without this data?

- **Future Land Use:** What are the current and future land use plans for the area around PFNW in the City of Richland? With more housing and other developments planned, it is important to consider how these changes will impact the site and surrounding community. News articles suggest that the City of Richland plans to add hydrogen storage near or around the area, but this is omitted from the SEIS draft. This should not be omitted as an adjacent explosion hazard.
- **Population Data and New Developments:** The population data in the document is outdated. Richland's current population is approximately 65,656, not the 2019 data used in the SEIS draft. Additionally, the new 280-unit apartment building at Kingsgate and the City of Richland's plans to add hydrogen storage, which poses a potential explosion hazard, are omitted. These omissions understate the impacts to the public and should be addressed.

Other:

- **Age and Design Life of Facilities:** Information on the age of the facilities and their design life should be included. This is important for assessing the long-term safety and reliability of the facility.
- **Personal Communication Citations:** Hanford Challenge cannot recall ever seeing a citation to "personal communication" in draft documents out for public comment without further information or documentation. The SEIS draft contains numerous citations to "personal communication." It is unclear who these individuals are, where they work, and who they represent. More transparency and documentation are needed regarding these communications to ensure credibility and accountability.
- **Hydrogen Storage:** The City of Richland plans to add hydrogen storage near or around the area, but this is omitted from the SEIS draft.
- **Use of Unionized Workforce at Perma-Fix Northwest:** A promising development is the signing of a Project Labor Agreement between Perma-Fix Northwest and UA Local 598 in 2023. Utilizing the skilled labor of UA Local 598 would address Hanford Challenge's concern of needing a highly trained and unionized workforce. UA Local 598 brings the necessary skills, expertise, and safety culture, along with a strong track record of advocating for their members.

This SEIS Draft is a crucial tool for Washington state to implement safeguards and conditions to mitigate the potential dangers of a commercial facility treating Hanford's waste in the City of Richland. The facility poses risks of soil contamination and water pollution, and it could also negatively impact local air quality and biodiversity. By highlighting these concerns, we aim to ensure that the permit comprehensively addresses these cumulative impacts and establishes a robust long-term monitoring program to mitigate them.

Thank you for considering our comments.



Nikolas Peterson, Executive Director