

## Anonymous Anonymous

Thank you for the opportunity to comment on the Draft SEIS for PFNW's Dangerous Waste Permit Renewal. PFNW's role in treating secondary waste (e.g., 2,600 m<sup>3</sup>/year DFLAW waste) is critical to managing tank waste retrieval at Hanford. While the SEIS is robust there is room for a tighter integration with Hanford's strategy, leveraging DOE's NEPA flexibility. Recommendations follow:

1. DOE-PFNW MOU with Categorical Exclusion (CX): An MOU between DOE and PFNW, paired with a NEPA CX (e.g., B6.1 or B6.4, 10 CFR § 1021). The MOU would secure PFNW's capacity (241,011 metric tons) and logistics (39 trips/year, Section 3.2.4.1) for retrieved waste, while a CE streamlines transfers. This ensures reliability and efficiency, building on DOE's prior MOUs (e.g., WCS). This has likely been considered but wanted to encourage this path to complementing the permit.
2. Tank-Specific Waste Mapping: The SEIS lacks specifics on tank farms feeding PFNW (Section 3.2.2). A table linking waste streams to PFNW's treatment, using DOE data, would enhance alignment.
3. Grouting and Closure Potential: An MOU would formalize waste management cooperation, including exploring methods like grouting. Pairing this with a section in the SEIS that recognizes the potential for such methods, ensures alignment with Hanford's long-term clean up objectives.

An MOU and CX integrates PFNW with retrieval and DFLAW goals, ensuring waste disposal, efficiency, and long-term planning.