

March 16, 2026

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MAR 20 2026
Department of Ecology
NWP - Richland

Daina McFadden
Washington Department of Ecology
3100 Port of Benton Blvd
Richland, WA 99354

Dear Ms. McFadden:

I am writing in response to the 30-day public comment period on the revised Notice of Construction (NOC) Approval Order DE02NWP-002, Revision 4 for revisions of non-radioactive air emissions from WTP.

The proposed change increases the number of LAW-6 Samples, replaces boiler burners, and provides reformatting.

1. I did not see red-lines or strikeouts in the proposed revision. "Reformatting" should not eliminate the need to show the changes in the text in each subject area. Asking the public to proofread when there are no redlines is disappointing.
2. I appreciate that additional samples may shed light on operational upsets. However, the WTP equipment used to collect AOP data is not being well-maintained. In just 6 months, from July to December 2025, WTP experienced "unexpected downtime" for the following:

LAW LV-S3 Record Sampler,
LAW LV-S3 CAM,
LV-C2 Record Sampler, and
LAW LV-S3 C-14 Sampler,
LAW - C3V Record Sampler (Unexpected Downtime Event exceeding 4 hours)

The reference for these failures is 26-ECD-0019, *HANFORD SITE AIR OPERATING PERMIT SEMIANNUAL REPORT FOR JULY 1, 2025, THROUGH DECEMBER 31, 2025*, DOE/HFO-2026-03, REVISION 0.

Ecology should ensure ALL AOP related equipment is properly operated and maintained and should use its enforcement capabilities to do so. WDOH should be encouraged to use their enforcement capabilities also. Otherwise, the public exposures are understated.

3. C-14 was higher than anticipated in shipping to LERF from WTP per DOE-HFO TWO/WTP Tri-Party Agreement/Consent Decree Monthly Project Managers Meeting Minutes January 8, 2026 (AR-39503). The above failure of the C-14 sampler is an example of potential undercounting in the face of higher discharges. Ecology should coordinate with WDOH on this.

4. Per 25-ECH-0058, (provided for review): *“The LB-S1 and LB- S2 emission units have the potential to emit radioactive air emissions; therefore, a separate NOC application (24590-WTP-RPT-ENV-24-002, Radioactive Air Emissions Notice of Construction Modification Request to the WTP Analytical Laboratory LB-S1 and LB-S2 Emission Units) will be submitted to the WDOH for proposed radionuclide emission increases associated with the increase in the total annual volume of sample materials for the LAW 6 sample point.”* This is nice, but WDOH does not provide an opportunity for public comment on its Hanford Notices of Construction. As a result, I would appreciate your help in sharing these comments with WDOH.

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