

Hanford Tank Waste Operations & Closure (H2C) (Thomas Beam)

Please see attached file for comments from Hanford Tank Waste Operations & Closure on the proposed draft approval order DE05NWP-002, Rev. 4. Thank you.

H2C Public Comments – Draft Air Approval Order DE05NWP-002, Revision 4

State of Washington Department of Ecology
3100 Port of Benton Blvd.
Richland, WA 99354

Ecology Nuclear Waste Program Air Permitting Staff;

Hanford Tank Waste Operations and Closure (H2C), appreciates the opportunity to review and provide formal comments on draft Air Approval Order No. DE05NWP-002, Revision 4. As the prime contractor responsible for tank waste management and closure operations at the Hanford Site, H2C is committed to regulatory compliance, worker safety, and environmental stewardship throughout all phases of facility and waste processing operations.

H2C has completed a comprehensive review of the draft approval order, its operational constraints, and the associated technical support document to ensure the final permit conditions are technically practical, legally defensible, clear, and aligned with tank waste mission schedules while maintaining compliance with applicable federal and state environmental requirements. Enclosed are detailed comments addressing specific technical, monitoring, and administrative provisions within the draft order.

H2C respectfully requests that the State of Washington Department of Ecology (Ecology) consider these comments and incorporate the proposed clarifications and revisions into the final Approval Order for DE05NWP-002, Revision 4. H2C technical staff welcome the opportunity to meet with Ecology to discuss these issues and provide additional operational context to support development of a clear and executable final approval order. If you have questions or require additional information regarding this submittal, please contact Tom Beam at (509)376-9016 or thomas_g_beam@rl.gov.

Thank you.

Tom Beam, Manager
H2C Environmental Permitting

Comment #1: Technical Support Document Project Summary contains inaccurate description

The second paragraph of the Technical Support Document (TSD) Project Summary includes the statement “*For waste which can be treated at LAW, the general pathway is retrieval from the SST farm to the 241-AP Double-Shell Tank (DST) Farm, where it is pretreated using the Tankside Cesium Removal System and stored until transfer to WTP.*” This statement is not entirely accurate as there are several projected options for pretreating Single Shell Tank (SST) waste besides the Tank Side Cesium Removal (TSCR) system including the West Area Risk Management (WARM) project and the Advanced Modular Pretreatment System (AMPS) project.

Requested Change: H2C requests that Ecology use a more generic project description as follows: “For waste managed as LAW, the general pathway is retrieval from an SST Farm to a Double-Shell Tank (DST) Farm where it is pretreated using a pretreatment capability, such as the Tank-Side Cesium Removal (TSCR) system, and stored until transfer to a treatment facility.”

Comment #2: Technical Support Document Editorial

For clarity, consistency with the DE26NWP-001 TSD and to avoid any ambiguity, H2C requests Ecology specify “*Washington State Department of Health*” the first time “*Health*” is referred to in the TSD.

Comment #3: Correct Nitrosamine Nomenclature in Draft Approval Order DE05NWP-002, Revision 4

Nomenclature of nitrosamines indicates molecular bonding for different isomers.

Requested Change: H2C requests Ecology globally correct the nitrosamine nomenclature by capitalizing the “N” in N-Nitrosodi-N-propylamine, N-Nitrosodi-N-butylamine, N-Nitrosomethylethylamine, and N-nitrosodi-N-propylamine in Findings #4, Findings #16, and the reference section under Table 1. This change will ensure consistency and accuracy throughout the approval order and is consistent with the nomenclature in WAC 173-460-150.

Comment #4: Draft Approval Order DE05NWP-002, Revision 4 does not provide for appeal via email

The appeal process has not been updated in Draft Approval Order DE05NWP-002, Revision 4. While the Ecology email address is included under **Filing with the PCHB**, the last bullet under **Your Right to Appeal** specifically states “*E-mail is not accepted.*”

Requested Change: H2C requests Ecology update the information under **Filing with the PCHB** to be consistent with Draft Approval Order DE26NWP-001 and to allow submittal via email.

Comment #5: Draft Approval Order DE05NWP-002, Revision 4 Editorial

The last sentence in Findings #16 and the third bullet in Approval Condition 3.1 are missing ending punctuation.

Approval Condition “4.6” is a different font color other than black.

H2C suggests rewording **ADA Accessibility** to read “*To request an ADA accommodation, email ecyadacoordinator@ecy.wa.gov, call (360)407-6831, or dial 711.....*” to improve readability, and to include the applicable email address and phone number.