Laura Feldman

Dear To Whom It May Concern,

I appreciate Washington State Department of Ecology (Ecology) for enforcing the Tri-Party Agreement and Consent Decree and strongly pushing back on USDOE's proposed Dual Path Approach. Ecology's oversight protects workers, communities, Tribal Nations, future generations, and the Columbia River. I commend Ecology for keeping the focus on the Low-Activity Waste Facility and vitrifying tank waste from 200 East.

The following comments apply to two comment periods:
1. Class 2 RCRA Permit Mod Request for the Low-Activity Waste Pretreatment System, Operating Unit Group 1 (AR-41147)
2. Class 3 RCRA Permit Mod Request for the Waste Treatment and Immobilization Plant, Operating Unit Group 10 (AR-41146)

Don't proceed with the Dual Path Approach. Reject USDOE's Dual Path Approach permit modification requests and stick to the plan for feeding the Low-Activity Waste vitrification plant with pretreated liquid tank waste. Do not allow USDOE to re-route any of the LAW waste feed for grouting and disposal offsite. Focus on getting both melters in the LAW Facility operating at optimal throughput.

Thank you for considering my comment.My name is Laura Feldman, I live in Portland, OR. I served the Oregon Hanford Cleanup Board for seven years ending in 2024. I have some knowledge of how fragile and complex the clean up/containment of Hanford waste is, and by extension the threat it poses for all communities in this region and beyond.

I want to thank the Washington Department of Ecology for alerting us to these recent and sudden hearings on the REV 9 and Duel Path permits. I support the State of Washington's exercise of RCRA (hazardous waste law) authority at the Hanford Nuclear Site and the tremendous effort it takes to ensure safe storage, cleanup and disposal of all hazardous wastes at Hanford.

Hanford's focus should be on optimizing the LAW facility, not grout.
I find the federal deregulation of nuclear safety and environmental standards, along with the reduction of Hanford's federal work force to be very concerning, especially at a time when the challenges to the region from the climate crisis are increasing exponentially putting Hanford at risk for more wildfires, growing limitations to access of an adequate water supply from the Columbia River for cleanup operations, and much more.

I urge Ecology to reject Energy's permit modification requests which would support Energy's attempts to grout a new waste stream at Hanford and transport this dangerous cargo through Washington state to Utah, whose residents by the way do not want this dangerous waste. Energy must support accelerating and improving operations at the Low Activity Waste Vitrification facility ("LAW facility").

I agree with Ecology's concerns that attempts to reroute pre-treated liquid tank waste for shipping and grouting offsite will only divert funding and attention away from from other crucial work at

Hanford which includes: Emptying of known leaking tanks, the cleanup of the 324 Building and the highly contaminated 300-296 waste site beneath it, movement of the Waste Encapsulation and Storage Facility (WESF) of 1,936 radioactive cesium-137 and strontium-90 capsules. The list goes on.

The U.S. Department of Energy ("Energy") needs oversight when it comes to cleanup. Across the board it is clear Energy is not making decisions that are protective of human health and the environment.

For all our sakes, Washington state must not be bullied by Energy when it comes to decision making at Hanford.

Thank you.
Sincerely,
Laura Feldman