Tom Carpenter

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.

I urge Ecology to deny both of USDOE's permit modification requests for the Dual Path Approach and to keep the Low-Activity Waste Facility on its intended course: vitrifying pretreated tank waste, with both melters running at full design throughput.

I spent more than four decades representing Hanford workers and whistleblowers. In that time, I saw the same pattern again and again. USDOE makes a decision internally, announces it as settled, and then treats public input as something to manage rather than something to weigh. The Dual Path Approach fits that pattern. It was not part of the Holistic Settlement Agreement that the Tri-Party Agencies released in January 2025, after years of negotiation. Since then, USDOE has issued the July 2026 Final Supplement Analysis and the September 2026 Final WIR Evaluation and Determination without any opportunity for public review. A major change to how Hanford's high-level tank waste is treated and where it ends up should not reach the public as a finished product.

The recent disclosure that one grouted waste form looks more like loose, gravelly soil than a solid monolith is a serious problem. USDOE apparently knew this was possible for years and did not say so. That undermines confidence in everything else the agency has said about grout. Before any permit modification is approved, USDOE should make public:

A full cost breakdown covering retrieval, pretreatment, characterization and testing, onsite and offsite transportation, offsite treatment, disposal fees, and long-term monitoring, with the assumptions behind each figure.

The range of grout-to-waste expansion factors, how much dilution is needed to bring higher-activity waste down to Class A, and whether there is a practical limit to that approach.

How those expansion factors affect shipment volumes and costs.

Leaching and dispersal data for each grouted waste form, both in the disposal environment and in a transportation accident.
The ingredients in the grout, even if the exact proportions remain proprietary. In particular, the public should know whether any polymers break down in caustic conditions. The public should also know what testing shows that free liquids will not separate out over time or under compression, since neither the Utah nor the Texas disposal site can accept liquids.

A complete transportation plan, written in plain language, that shows the number, frequency, timing, and duration of shipments. That plan should cover this proposal together with all other projected offsite shipments, including EMF bottoms, 200 West Area grouted waste, and transuranic waste.

Once that information is available, the public deserves a real comment period that is long enough to evaluate it. Until then, USDOE should put its effort into getting both LAW melters operating reliably and producing the glass waste form ik you for considering my comment.

Sincerely,
Tom Carpenter