AVANTech LLC (Rob Hastings)

Comments on Class 2 Permit Modification Request C2-LAWPS-2026-01 for the Low-Activity Waste Pretreatment System, Operating Unit Group 1

1. Hanford Facility RCRA Permit Modification Form, page 1 (page 5 of 132 of the pdf) - The second bullet at the top of the page reads: "Grout Stabilization: Shipped offsite to a dedicated grout facility." Instead, it should be: "Grout Stabilization: Shipped to an alternate treatment facility for grouting and shipped outside Washington state for disposal." This wording change reflects the remainder of the RCRA permit modification. It also reflects the description of the proposed action in Section 1.2 of the Supplement Analysis (SA) of the Final Tank Closure and Waste Management EIS for the Hanford Site – Management of Pretreated Tank Waste from Tank AP-106 (DOE/EIS-0391-SA-06, July 2026). The wording change also provides alignment with the Proposed Action in the 200W Tank Waste Treatment SA (DOE/EIS-0391-SA-05, October 2025). Suggest using the same wording as in the remainder of this permit modification "... for vitrification or shipped to an alternate treatment facility for grouting and offsite disposal."
2. Addendum A, Part A Form, Section XI, S01, Container Storage, page A.4 (page 12 of 132) – The first paragraph on this page has an error. The process design capacity of the outdoor concrete pad is 120 cubic yards, based on generating 30 IX columns per year (2 cubic yards per year with a nominal internal volume of 0.8 cubic yards per column, multiplied by projected 5-year processing duration. As written, the math does not work out. Instead of 2 cubic yards per year, it should be 24 cubic yards per year.
3. General comment – Since the TSCR IX Columns are also very effective at removing Sr-90, would it be beneficial to be included in this permit modification for alternate treatment for waste classification purposes.
4. General comment - There are several locations within this permit modification that address analysis requirements for waste batches for WTP during the DFLAW configuration. Should batch analysis requirements be stated for grout treatment with offsite disposal or is it assumed that waste sampling and analysis requirements for WTP satisfy grout treatment requirements?
5. General comment – Details and requirements associated with the Material Conveyance System (MCS) are not included in this permit modification. Shouldn't the MCS be addressed, at least the systems/ components that control the release of pretreated waste from AP-106?

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