DEPARTMENT OF
ECOLOGY
State of Washington

Response to Comments

Proposed Permit Updates for Units within the Solid Waste Operations Complex, Hanford Site in Response to an Environmental Protection Agency Consent Agreement and Final Order (RCRA-10-2013-0113)

October 30, 2013 through January 6, 2014

Summary of a public comment period and responses to comments

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PUBLICATION AND CONTACT INFORMATION

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Ecology publishes this document to meet the requirements of Washington Administrative Code 173-303-840 (9).

If you need this document in a format for the visually impaired, call the Nuclear Waste Program at 509-372-7950. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

Response to Comments

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October 30, 2013 through January 6, 2014

Department of Ecology
Nuclear Waste Program
3100 Port of Benton Boulevard
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INTRODUCTION

The Washington State Department of Ecology's Nuclear Waste Program (Ecology) manages dangerous waste within the state by writing permits to regulate its treatment, storage, and disposal.

When a new permit or a significant modification to an existing permit is proposed, Ecology holds a public comment period to allow the public to review the change and provide formal feedback. (See Washington Administrative Code [WAC] 173-303-830 for types of permit changes.)

The Response to Comments is the last step before issuing the final permit, and its purpose is to:

- Specify which provisions, if any, of a permit will become effective upon issuance of the final permit, providing reasons for those changes.
- Describe and document public involvement actions.
- List and respond to all significant comments received during the public comment period and any related public hearings.

This Response to Comments is prepared for:

Comment period:	*Proposed Permit Updates for Solid Waste Operations Complex Facilities, October 30, 2013 through January 6, 2014*
Permit:	*Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Groups (WA7890008967) 6-Central Waste Complex,7-Waste Receiving and Packaging, 9-T Plant Complex, and 17-Low-Level Burial Grounds Trenches 31 and 34*
Permittees:	*U. S. Department of Energy, Richland Operations Office, and CH2M Hill Plateau Remediation Company.*
Original issuance date:	*September 27, 1994*

To see more information related to the Hanford Site and nuclear waste in Washington, please visit our website: www.ecy.wa.gov/programs/nwp.

REASONS FOR MODIFYING THE PERMIT

On June 26, 2013, the U.S. Department of Energy (USDOE) and the U.S. Environmental Protection Agency (EPA) signed a Consent Agreement and Final Order, Docket Number RCRA-10-2013-0113 (CAFO). The CAFO required the closure of several Hanford Site Dangerous Waste Management Units (DWMUs).

The permit modification requires closure plans to be submitted for the DWMUs listed. The DWMUs are located within three of the Hanford Facility (RCRA) Permit's Operating Unit Groups:

Operating Unit Group (OUG)	DWMUs
Central Waste Complex (CWC) OUG-6	Outdoor Storage Area A
	Outdoor Storage Area B
	2401-W Waste Storage Building
T Plant Complex (T Plant) OUG-9	271-T Cage
	211-T Pad
	221-T Sand Filter Pad
	221-T R5 Waste Storage Area
	277-T Outdoor Storage Area
Low-Level Burial Grounds Trenches 31 & 34 – OUG-17	FS-1 Outdoor Container Storage Area

The Permittees combined two sets of operating unit groups (OUGs) when they submitted the Closure Plan Addenda Introductions, Part A Forms, Training Addenda, and Inspection Addenda. The OUGs and types of documents submitted are listed below:

Operating Unit Groups	Closure Plan Addenda - Introduction	Part A Forms	Training Addenda	Inspection Addenda
CWC OUG-6 / Waste Receiving and Processing facility (WRAP) OUG-7 *	X	X	X	X
T Plant OUG-9	X	X	X	X
LLBG Trenches 31-34 – OUG-17 / LLBG Trench 94 – OUG-18 *	X	X	X	X

**Two OUGs were combined*

This Response to Comments covers comments received for all CAFO DWMUs during the USDOE public comment period. The nine closure plans will be revised with USDOE based on those comments. Starting in the summer of 2015 and continuing into 2016, the revised closure plans will be released for a second public comment period hosted by Ecology. We continue to work with USDOE on review of the other documents submitted in October of 2013.

PUBLIC INVOLVEMENT ACTIONS

Ecology and the permittees encouraged public comment on the document(s) out for public review during a 60-day public comment period held October 30, 2013 through January 6, 2014.

Under WAC 173-303-830(4)(c), the permittee is responsible to hold a comment period and public meeting for Class 3 permit changes. To meet the requirements, the permittee:

- Emailed advance notice of the document period to the Hanford-Info email list, which then had 1,238 recipients.
- Mailed a notice announcing the comment period to the 2,031 interested members of the public.
- Announced the comment period on the online Hanford Events Calendar.
- Distributed copies of the public notice to members of the public at Hanford Advisory Board meetings.
- Sent a notice announcing the start of the comment period to the Hanford-Info email list.
- Placed an advertisement in the Tri-City Herald on October 30, 2013.
- Held a public meeting on December 9, 2013 at the Richland Public Library. No public comments resulted from the meeting, though several members of the public attended.

Ecology posted the comment period announcements and review materials on our website and in our lobby publications stand.

The Hanford information repositories located in Richland, Spokane, and Seattle, Washington, and Portland, Oregon, received the following documents for public review:

- Public notice
- Transmittal letter
- Permit applications (Part A forms) for
    - LLBGs Trenches 31-34-94
    - CWC/WRAP
    - T-Plant
- Training Addenda for those units
- Inspection Addenda for those units
- Closure plans for the CAFO DWMUs to be closed.

The following public notices for this comment period are in Appendix A of this document:

1. Public notice
2. Classified advertisement in the *Tri-City Herald*
3. Advance notice sent to the Hanford-Info email list
4. Comment period start announcement sent to the Hanford-Info email list

LIST OF COMMENTERS

Commenter Identification:

The table below lists the names of organizations or individuals (in alphabetical order) who submitted comments on the Solid Waste Operations Complex (SWOC) CAFO Permit modification and where you can find Ecology's response to the comment(s).

Commenter Number / Commenter		Organization	Date	Comment Number	Page Number
39	Nancy Ball	Citizen	1-3-2014	39a	60
	Nancy Ball	Citizen	1-3-2014	39b	61
26	Boni Biery	Citizen	1-6-2014	26	31
17	Mark Bloome	Citizen	12-31-2013	17	21, 22
41	Robin Bloomgarden	Citizen	1-4-2014	41a	62
	Robin Bloomgarden	Citizen	1-4-2014	41b	62
	Robin Bloomgarden	Citizen	1-4-2014	41c	62
	Robin Bloomgarden	Citizen	1-4-2014	41d	63
15	Leah Boehm	Citizen	11-29-2013	15	21
22	Pam Borso	Citizen	12-31-2013	22a	26, 27
	Pam Borso	Citizen	12-31-2013	22b	27
	Pam Borso	Citizen	12-31-2013	22c	27
	Pam Borso	Citizen	12-31-2013	22d	27, 28
47	Marti Buck	Citizen	1-3-2014	47	67
38	Beth Call	Citizen	1-3-2014	38a	59
	Beth Call	Citizen	1-3-2014	38b	59, 60
	Beth Call	Citizen	1-3-2014	38c	60
10	Jane Camero	Citizen	1-1-2014	10a	15
	Jane Camero	Citizen	1-1-2014	10b	15
	Jane Camero	Citizen	1-1-2014	10c	15, 16
	Jane Camero	Citizen	1-1-2014	10d	16
	Jane Camero	Citizen	1-1-2014	10e	16
	Jane Camero	Citizen	1-1-2014	10f	17
	Jane Camero	Citizen	1-1-2014	10g	17
20	Mike Conlan	Citizen	12-31-13&1-3-14	20a	24
	Mike Conlan	Citizen	12-31-13&1-3-14	20b	24
	Mike Conlan	Citizen	12-31-13&1-3-14	20c	24
	Mike Conlan	Citizen	12-31-13&1-3-14	20d	24, 25
	Mike Conlan	Citizen	12-31-13&1-3-14	20e	25
	Mike Conlan	Citizen	12-31-13&1-3-14	20f	25
	Mike Conlan	Citizen	12-31-13&1-3-14	20g	25
	Mike Conlan	Citizen	12-31-13&1-3-14	20h	25
27	Meredith Crafton/Tom Carpenter	Hanford Challenge	1-6-2014	27a	31
	Meredith Crafton/Tom Carpenter	Hanford Challenge	1-6-2014	27b	32
	Meredith Crafton/Tom	Hanford Challenge	1-6-2014	27c	32, 33

Commenter Number / Commenter		Organization	Date	Comment Number	Page Number
	Carpenter				
	Meredith Crafton/Tom Carpenter	Hanford Challenge	1-6-2014	27d	33
	Meredith Crafton/Tom Carpenter	Hanford Challenge	1-6-2014	27e	34
	Meredith Crafton/Tom Carpenter	Hanford Challenge	1-6-2014	27f	34
	Meredith Crafton/Tom Carpenter	Hanford Challenge	1-6-2014	27g	34, 35
	Meredith Crafton/Tom Carpenter	Hanford Challenge	1-6-2014	27h	35
	Meredith Crafton/Tom Carpenter	Hanford Challenge	1-6-2014	27i	35, 36
	Meredith Crafton/Tom Carpenter	Hanford Challenge	1-6-2014	27j	36
	Meredith Crafton/Tom Carpenter	Hanford Challenge	1-6-2014	27k	36, 37
33	Erendira Cruz	Citizen	1-6-2014	33a	54
	Erendira Cruz	Citizen	1-6-2014	33b	54
	Erendira Cruz	Citizen	1-6-2014	33c	54
18	Michelle Devlaeminck	Citizen	12-30-2013	18	22
49	Theresa DiPasquale	Citizen	1-3-2014	49a	69
	Theresa DiPasquale	Citizen	1-3-2014	49b	69
	Theresa DiPasquale	Citizen	1-3-2014	49c	69, 70
	Theresa DiPasquale	Citizen	1-3-2014	49d	70
43	Craig Edwards	Citizen	1-3-2014	43a	64
	Craig Edwards	Citizen	1-3-2014	43b	65
	Craig Edwards	Citizen	1-3-2014	43c	65
	Craig Edwards	Citizen	1-3-2014	43d	65
48	Sharon Fasnacht	Citizen	1-2-2014	48a	67
	Sharon Fasnacht	Citizen	1-2-2014	48b	67, 68
	Sharon Fasnacht	Citizen	1-2-2014	48c	68
	Sharon Fasnacht	Citizen	1-2-2014	48d	68
	Sharon Fasnacht	Citizen	1-2-2014	48e	68
	Sharon Fasnacht	Citizen	1-2-2014	48f	68, 60
6	Doris Fulton	Citizen	12-29-2013	6	12, 13
16	Linda and Leonard Good	Citizen	12-29-2013	16	21
21	Mitchell Santine Gould	Citizen	1-1-2014	21a	25, 26
	Mitchell Santine Gould	Citizen	1-1-2014	21b	26
	Mitchell Santine Gould	Citizen	1-1-2014	21c	26
	Mitchell Santine Gould	Citizen	1-1-2014	21d	26
3	Brie Gyncild	Citizen	12-30-2013	3a	10

Commenter Number / Commenter		Organization	Date	Comment Number	Page Number
	Brie Gyncild	Citizen	12-30-2013	3b	10, 11
	Brie Gyncild	Citizen	12-30-2013	3c	11
	Brie Gyncild	Citizen	12-30-2013	3d	11
	Brie Gyncild	Citizen	12-30-2013	3e	11
1	Amy Hagopian	Citizen	12-29-2013	1a	9
	Amy Hagopian	Citizen	12-29-2013	1b	9
	Amy Hagopian	Citizen	12-29-2013	1c	9
	Amy Hagopian	Citizen	12-29-2013	1d	10
24	Steven B Hartholz	Citizen	12-29-2013	24a	29
	Steven B Hartholz	Citizen	12-29-2013	24b	29, 30
	Steven B Hartholz	Citizen	12-29-2013	24c	30
	Steven B Hartholz	Citizen	12-29-2013	24d	30
40	Richard Hernandez	Citizen	1-3-2014	40a	61
	Richard Hernandez	Citizen	1-3-2014	40b	61
	Richard Hernandez	Citizen	1-3-2014	40c	61
	Richard Hernandez	Citizen	1-3-2014	40d	62
37	Carol Hiltner	Citizen	1-4-2014	37a	57, 58
	Carol Hiltner	Citizen	1-4-2014	37b	58
	Carol Hiltner	Citizen	1-4-2014	37c	58
	Carol Hiltner	Citizen	1-4-2014	37d	58
	Carol Hiltner	Citizen	1-4-2014	37e	59
	Carol Hiltner	Citizen	1-4-2014	37f	59
4	Charlotte House	Citizen	12-30-2013	4a	12
	Charlotte House	Citizen	12-30-2013	4b	12
	Charlotte House	Citizen	12-30-2013	4c	12
30	Russell Jim	Yakama Nation	1-6-2014	30a-1	39, 40
	Russell Jim	Yakama Nation	1-6-2014	30a-2	40
	Russell Jim	Yakama Nation	1-6-2014	30b	40
	Russell Jim	Yakama Nation	1-6-2014	30c	41
	Russell Jim	Yakama Nation	1-6-2014	30d	41
	Russell Jim	Yakama Nation	1-6-2014	30e	41
	Russell Jim	Yakama Nation	1-6-2014	30f	41, 42
	Russell Jim	Yakama Nation	1-6-2014	30g	42, 43
	Russell Jim	Yakama Nation	1-6-2014	30h	43
	Russell Jim	Yakama Nation	1-6-2014	30i	43, 44
	Russell Jim	Yakama Nation	1-6-2014	30j	44
	Russell Jim	Yakama Nation	1-6-2014	30k	44
	Russell Jim	Yakama Nation	1-6-2014	30l	44
	Russell Jim	Yakama Nation	1-6-2014	30m	44, 45
	Russell Jim	Yakama Nation	1-6-2014	30n	45
	Russell Jim	Yakama Nation	1-6-2014	30o	45
	Russell Jim	Yakama Nation	1-6-2014	30p	45
	Russell Jim	Yakama Nation	1-6-2014	30q	46

Commenter Number / Commenter		Organization	Date	Comment Number	Page Number
	Russell Jim	Yakama Nation	1-6-2014	30r	46
	Russell Jim	Yakama Nation	1-6-2014	30s	46
	Russell Jim	Yakama Nation	1-6-2014	30t	46, 47
	Russell Jim	Yakama Nation	1-6-2014	30u	47
	Russell Jim	Yakama Nation	1-6-2014	30v	47, 48
	Russell Jim	Yakama Nation	1-6-2014	30w	48
	Russell Jim	Yakama Nation	1-6-2014	30x	48, 49, 50
	Russell Jim	Yakama Nation	1-6-2014	30y	50
	Russell Jim	Yakama Nation	1-6-2014	30z	50, 51
	Russell Jim	Yakama Nation	1-6-2014	30aa	51
	Russell Jim	Yakama Nation	1-6-2014	30bb	51, 52
31	Dorothy Lamb	Citizen	1-6-2014	31a	52
	Dorothy Lamb	Citizen	1-6-2014	31b	52
	Dorothy Lamb	Citizen	1-6-2014	31c	52
	Dorothy Lamb	Citizen	1-6-2014	31d	53
2	Bjorn Lunde	Citizen	12-29-2013	2	10
29	Nancy Matela	Citizen	1-6-2014	29	39
7	Edward McAnnich	Citizen	12-30-2013	7	13
45	Lisa McKhann	Citizen	1-3-2014	45	66
14	Laura Milner	Citizen	12-30-2013	14	20, 21
12	Joe Mitter	Citizen	12-31-2013	12	20
46	Marion Moos	Citizen	1-2-2014	46	66, 67
28	Nancy Morris	Citizen	1-6-2014	28a	37
	Nancy Morris	Citizen	1-6-2014	28b	38
	Nancy Morris	Citizen	1-6-2014	28c	38
	Nancy Morris	Citizen	1-6-2014	28d	38
	Nancy Morris	Citizen	1-6-2014	28e	38, 30
	Nancy Morris	Citizen	1-6-2014	28f	39
25	Joyce Namba	Citizen	1-6-2014	25	30
35	Elena Naskova	Citizen	1-5-2014	35a	56
	Elena Naskova	Citizen	1-4-2014	35b	56
36	Jesse Phillips	Citizen	1-4-2014	36a	56, 57
	Jesse Phillips	Citizen	1-4-2014	36b	57
	Jesse Phillips	Citizen	1-4-2014	36c	57
	Jesse Phillips	Citizen	1-4-2014	36d	57
13	Judy Pigott	Citizen	12-29-2013	13	20
23	Sandy Polishuk	Citizen	1-2-2014	23a	28
	Sandy Polishuk	Citizen	1-2-2014	23b	28
	Sandy Polishuk	Citizen	1-2-2014	23c	28
	Sandy Polishuk	Citizen	1-2-2014	23d	29
	Sandy Polishuk	Citizen	1-2-2014	23e	29
42	Gerry Pollet	Heart of America NW	1-6-2014	42a	63
	Gerry Pollet	Heart of America NW	1-6-2014	42b	63

Commenter Number / Commenter		Organization	Date	Comment Number	Page Number
	Gerry Pollet	Heart of America NW	1-6-2014	42c	64
	Gerry Pollet	Heart of America NW	1-6-2014	42d	64
8	Elizabeth Raintree	Citizen	12-30-2013	8	13
32	Candace Rose	Citizen	1-6-2014	32a	53
	Candace Rose	Citizen	1-6-2014	32b	53
	Candace Rose	Citizen	1-6-2014	32c	53, 54
19	Michael and Annette Rose	Citizen	12-29-2013	19a	22
	Michael and Annette Rose	Citizen	12-29-2013	19b	22
	Michael and Annette Rose	Citizen	12-29-2013	19c	23
	Michael and Annette Rose	Citizen	12-29-2013	19d	23
	Michael and Annette Rose	Citizen	12-29-2013	19e	23, 24
50	Tom Shinabarger	Citizen	1-2-2014	50a	70
	Tom Shinabarger	Citizen	1-2-2014	50b	70, 71
9	Forest Shomer	Citizen	12-29-2013	9a	13, 14
	Forest Shomer	Citizen	12-29-2013	9b	14
	Forest Shomer	Citizen	12-29-2013	9c	14
	Forest Shomer	Citizen	12-29-2013	9d	14
	Forest Shomer	Citizen	12-29-2013	9e	15
5	Christina Sundstrom	Citizen	12-29-2013	5	12
11	Joan H Ward	Citizen	12-31-2013	11a	17, 18
	Joan H Ward	Citizen	12-31-2013	11b	18
	Joan H Ward	Citizen	12-31-2013	11c	18
	Joan H Ward	Citizen	12-31-2013	11d	18
	Joan H Ward	Citizen	12-31-2013	11e	19
	Joan H Ward	Citizen	12-31-2013	11f	19
44	Kathleen Yockey	Citizen	1-2-2014	44a	65, 66
	Kathleen Yockey	Citizen	1-2-2014	44b	66
	Kathleen Yockey	Citizen	1-2-2014	44c	66
34	Vaughn Zeitzwolfe	Citizen	1-5-2014	34a	54, 55
	Vaughn Zeitzwolfe	Citizen	1-5-2014	34b	55
	Vaughn Zeitzwolfe	Citizen	1-5-2014	34c	55
	Vaughn Zeitzwolfe	Citizen	1-5-2014	34d	55
	Vaughn Zeitzwolfe	Citizen	1-5-2014	34e	56

RESPONSE TO COMMENTS

Description of Comments:

Ecology accepted comments on the SWOC CAFO Units from October 30, 2013 until January 6, 2014. This section provides summary of comments that we received during the public comment period and our responses, as required by RCW 34.05.325(6)(a)(iii). Comments are listed by individual/group and responses for comment(s) is/are addressed individually. Comments on similar topics will have the same response. Ecology's response directly follow each comment(s) in italic font. Verbatim copies of all written comments are attached in Appendix B.

Comment 1a from Amy Hagopian, Citizen, dated December 29, 2013

CWC – The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat all illegally stored wastes within 3 years. Our state's Department of Ecology should include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" or basis for the cited number of "68,000 drums." The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 1b from Amy Hagopian, Citizen, dated December 29, 2013

General – Public hearings should be held across the region on the proposed changes, including Seattle.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 1c from Amy Hagopian, Citizen, dated December 29, 2013

General – The public notice for the next round of review, comment and hearings must fully disclose that these permit changes were ordered by EPA due to USDOE illegally storing and disposing of wastes. The notice should disclose that wastes have leaked and explain the risks of prolonged storage.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 1d from Amy Hagopian, Citizen, dated December 29, 2013

LLBG Trenches 31/34 – The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; and, if leakage from disposal trenches is projected to contaminate groundwater.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 2 from Bjorn Lunde, Citizen, dated December 29, 2013

General – We can't allow new nuclear waste material to be stored at Hanford when all the old existing waste has not yet been safely handled and treated. Public participation and oversight in any process is essential: I expect the progressive State of Washington to set an international example of environmental responsibility!

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 3a from Brie Gyncild, Citizen, dated December 30, 2013

General - I am deeply concerned about recent decisions that would leave hazardous waste at Hanford, where it would continue to leak, and that would actually designate Hanford as an appropriate site for additional hazardous waste. The Washington State Department of Ecology needs to enforce state hazardous waste laws, pushing back on the USDOE's irresponsible decisions.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 3b from Brie Gyncild, Citizen, dated December 30, 2013

CWC-WRAP - The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat ALL illegally stored wastes within three years. You should include a schedule or removing and treating the 68,000 drums of wastes already stored

illegally inside CWC within three years, as well as a schedule to remove and treat all of the waste stored outside.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" or basis for the cited number of "68,000 drums." The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 3c from Brie Gyncild, Citizen, dated December 30, 2013

General - Public hearings should be held throughout the region. Clean water, soil, and air are a common right, and those affected by these decisions should know what's going on and should have a say. I especially want to see a hearing in the Seattle area, where I live, as well as hearings in communities that are closer to the Hanford site. (While Seattle may not be as close to the site, the Puget Sound region is the economic driver for the state and we're the ones who will pay the most if the state has to pick up the tab where USDOE fails.)

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 3d from Brie Gyncild, Citizen, dated December 30, 2013

General - It must be clear in the public notice for the next round of review, comment, and hearings that these permit changes were ordered by the EPA due to USDOE illegally storing and disposing of wastes. The notice must disclose that wastes have leaked, and must clearly explain the risks that come with prolonged storage.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 3e from Brie Gyncild, Citizen, dated December 30, 2013

LLBG Trenches 31 & 34 - The Hanford RCRA permit should specifically bar USDOE from adding any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, as long as existing wastes are stored illegally ANYWHERE at Hanford, and if leakage from disposal trenches is projected to contaminate groundwater.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 4a from Charlotte House, Citizen, dated December 30, 2013

General - If you don't listen to what the public wants, then how to you expect us to be active citizens in our democracy? What will motivate the public (me) to trust my government if you do illegal acts and then don't respond to my efforts to hold you accountable? Fight with us -- not against us. No one wants leakage at the Hanford site.

Ecology Response:

Thank you for your comment. Ecology shares your concerns. This comment is out of the scope for this SWOC closure plan modification.

Comment 4b from Charlotte House, Citizen, dated December 30, 2013

General – Clean it up! On schedule, as provided by law.

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 4c from Charlotte House, Citizen, dated December 30, 2013

General - Public hearings in 2014 are another top priority to me. Stop avoiding the inevitable: listen and then act. Our voices are clear!

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 5 from Cristina Sundstrom, Citizen, dated December 29, 2013

General - Please treat and remove the illegally stored waste within 3 years and hold public meetings in 2014. Waste kills.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" for removing wastes. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9). Ecology Public Involvement is working on the hearing issue.

Comment 6 from Doris Fulton, Citizen, dated December 29, 2013

General - I am a grandmother of a three-year-old named Evan. We both live in the state of Washington. It is immoral and illegal for Evan and his generation to be left with leaking drums of

nuclear waste-waste which is quickly traveling to the Columbia River and threatening ground water. We need a specific enforceable process to deal with the nuclear waste at Hanford such as dry-case storage. Washington State was selected to produce plutonium for the atomic bombs in World War II. Our state was promised that the nuclear waste would be cleaned up, and it has not. Our government wants to ignore the problem and not only leave the nuclear waste but actually add more to it by transporting waste from around the country to our state exposing the public to cancer and potential catastrophic accidents. Public input must be heard about this issue. Meetings need to be scheduled in Seattle, Spokane, and Portland. Your proposal will jeopardize Evan's health and well-being as well as the health and well-being of our children. Can't we for once consider our children? Can't we for once consider the environment? Can't we for once consider the American people?

Ecology Response:

Thank you for your comment. Ecology shares your concerns. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 7 from Edward McAnnich, Citizen, dated December 30, 2013

General - What is it about deadlines and prior agreements that you do not understand? My wife and I have been asking "what about the waste" since 1948, and our patience is running out. We thought that the new Secretary of DOE would be an improvement, but we are rapidly becoming disillusioned.

Ecology Response:

Thank you for your comment. Ecology shares your concerns. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 8 from Elizabeth Raintree, Citizen, dated December 30, 2013

General - We expect you to do the required clean-up and waste removal, both as required by law. Nothing less will do.

Ecology Response:

Thank you for your comment. Ecology shares your concerns. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 9a from Forest Shomer, Citizen, dated December 29, 2013

General - I strongly object to the possible trucking of Transuranic Wastes from Ohio and California to Hanford.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 9b from Forest Shomer, Citizen, dated December 29, 2013

Not only is the decades-long cleanup at Hanford behind schedule, there is the real possibility that USDOE will just add insult to injury by multiplying that cleanup backlog with more waste, in effect turning the site into a long-term storage site. There has to be a finish line to this cleanup**.**

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 9c from Forest Shomer, Citizen, dated December 29, 2013

Hanford was built largely to develop the bombs whose use ended World War II. We have been at peace with Japan for nearly 70 years, but the legacy of Hanford, and the toll it has taken on Downwinders and perhaps on the entire Lower Columbia River, has too long outlived any usefulness of the Hanford site. It becomes more difficult to tell whether Japan or our own country got the worst of that deadly bargain.

Ecology Response:

Thank you for your comment. This comment is out of the scope for this SWOC closure plan modification.

Comment 9d from Forest Shomer, Citizen, dated December 29, 2013

As a past attendee at Hanford public meetings in Seattle, I urge that dates be set at the earliest possible time for new public hearings to deal with the USDOE plan--in Seattle and at other appropriate localities. This is an issue of the greatest importance not only to those of us here to participate now, but for those who won't even be born for decades to come as the problem lingers on. My grandsons are growing up now in Washington--it is vitally important that they be given a decent chance to grow up and make their home in a state not burdened by decisions of convenience for the distant USDOE.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 9e from Forest Shomer, Citizen, dated December 29, 2013

Not to be overlooked in this, is the possible imposition of a "mobile Chernobyl" on the highways of our state and every other state between Hanford and the points from which wastes could be shipped--even far-off Ohio. This is not responsible action by our government.

Ecology Response:

Thank you for your comment. This comment is out of the scope for this SWOC closure plan modification.

Comment 10a from Jane Camero, Citizen, dated January 1, 2014

General - I am writing on New Year's Day in hope that true clean-up will take place at the Hanford Nuclear Reservation. I insist that Washington State issue firm schedules to treat and remove the illegally stored wastes within 3 years. I also ask for public meetings in 2014, more honesty, exhuming and treating trench waste, as well as no further import of waste. I ask that USDOE proposal include asking Congress for funding.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" for removing wastes. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 10b from Jane Camero, Citizen, dated January 1, 2014

It is time to change Hanford's hazardous waste (RCRA) permits for storing and disposing of radioactive wastes "mixed" with hazardous chemicals. It is my understanding that these important proposals are in response to a USEPA Order issued due to the violations of state and federal hazardous waste laws. We need to please be much more honest and much smarter. Illegally stored containers at the "Central Waste Complex" leaked, USDOE claimed the leakage was just rainwater!!! Sampling of the leakage in 2012 found cadmium, chromium, lead, mercury and polychlorinated biphenyls (PCB's). Hello!

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 10c from Jane Camero, Citizen, dated January 1, 2014

CWC-WRAP - USDOE's proposal needs to include enforceable schedules to remove and treat the wastes. Hundreds of people submitted comments to Ecology in 2012 on the Hanford hazardous waste permit urging that ALL illegally stored wastes should be removed from the Central Waste Complex and treated within three years. Ecology withdrew those proposed permit changes! USDOE's proposal blatantly omits any timeline for removing and treating the wastes. We need more than a Tri-Party Agreement for waste removal by 2030! State and federal hazardous waste

law rules require "closure" plans to have specific schedules to allow tracking of progress, with complete removal of wastes in 180 days!!

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9). We also agree that closure plans need schedules. We are working with USDOE to resolve that issue prior to the next public comment period.

Comment 10d from Jane Camero, Citizen, dated January 1, 2014

CWC-WRAP - Supposedly dry waste is leaking liquid and contaminating human beings. The wastes have been improperly misidentified and have been illegally stored for 18 years without a permit. But federal and state laws forbid storing wastes which are not dry and require that wastes be removed from storage to be treated within a year. Violations are deadly! That is why the law requires USDOE to remove hazardous wastes within a year. The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat all illegally stored wastes within 3 years. The Department of Ecology should include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" or basis for the cited number of "68,000 drums." The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 10e from Jane Camero, Citizen, dated January 1, 2014

LLBG Unlined Trenches - Violations continue in Hanford's Low-Level Waste Burial Grounds also where waste in 43 miles of trenches is just covered with dirt rather than exhumed and treated. Still only two trenches are lined? This has been illegal since the 1970's, when federal and state hazardous waste laws barred dumping garbage or hazardous waste. Last year the EPA documented that USDOE had illegally buried "high temperature gas reactor" and other drums of mixed chemical and radioactive wastes in the trenches without treatment. USDOE's proposal IS a 'cover-up', not cleanup and exactly why the permit should require exhuming and treating wastes from all of Hanford's trenches. No further offsite waste should be added. It is imperative that we protect our groundwater!!

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 10f from Jane Camero, Citizen, dated January 1, 2014

General - I have a question: Why didn't the notice sent by USDOE and Washington Ecology disclose that the proposal is the result of an EPA Order due to USDOE's illegal storage and disposal of wastes? These notices are counterproductive for Hanford cleanup. When another public comment period on Ecology's response in 2014 is scheduled, public notices should fully disclose key facts! I would like to see public hearings on the proposed changes across the region, including in Hood River, OR.

Ecology Response:

Thank you for your comment. For this comment period, USDOE decided what information to include. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 10g from Jane Camero, Citizen, dated January 1, 2014

LLBG Trenches 31 & 34 - Most disturbingly, on December 13, 2013, USDOE issued a formal decision on the Tank Closure Waste Management EIS that it may bring MORE waste to Hanford, but will delay import until it has the vitrification plant operating. Whether the vitrification plant operates has no bearing on USDOE's ability to safely store or dispose of more waste at Hanford. The USDOE has failed to consider the risks of shipping and storing the wastes at Hanford. There was no Environmental Impact Statement and USDOE did not have a hazardous waste permit to store the wastes! There is no safe storage for these wastes and the USDOE fails to have them treated to make them safe to store. The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford. The USDOE has failed to ask Congress to fund removal and treatment. If included in the permit, USDOE will be required to ask Congress for the funding to meet the closure plan schedule. Why for God's sake not?? We need all the help we can get to make the reservation and the Columbia River safe.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 11a from Joan H Ward, Citizen, dated December 31, 2013

General - According to the EPA Consent Agreement and Final Order, Hanford is storing hazardous waste without a permit, has failed to meet closure plan requirements, has failed to submit closure notice and closure plans, and failed to comply with land distribution restriction requirements. The USDOE has knowingly and deliberately ignored the CAFO's order to submit a written closure plan within 120 days of the effective date of the order which was June 26, 2013.

USDOE's proposal to deal with Hanford's hazardous waste fails to meet the standards required by Washington State hazardous waste law rules. The illegally stored containers at Hanford's "Central Waste Complex" have leaked numerous times, and the USDOE's response to the EPA's Consent Agreement and Final Order was without the required schedule for clean-up. State and federal hazardous waste law rules require "closure" plans to have specific schedules to allow tracking of progress, with complete removal of wastes in 180 days.

Ecology Response:

Thank you for your comment. The USDOE did submit closure plans within 120 days as required by the CAFO. Upon review, there were some requirements missing or inadequate within the closure plans. The schedule for closure was one of these issues. We have worked with the USDOE to correct these issues prior to the next public comment period.

Comment 11b from Joan H Ward, Citizen, dated December 31, 2013

CWC-WRAP - I earnestly ask you to include these vital points in the RCRA permit. 1. The Hanford hazardous waste permit for the Central Waste Complex should require USDOE to remove and treat ALL illegally stored wastes within 3 years.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" for removing wastes. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 11c from Joan H Ward, Citizen, dated December 31, 2013

General - 2. It is important that there should be a sincere effort to implement truly public hearings in other areas besides Richland that are affected by Hanford waste, which include but are not limited to communities downwind, downstream, and along proposed transportation routes bringing waste to Hanford from around the country.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 11d from Joan H Ward, Citizen, dated December 31, 2013

General - 3. The public notice for the next round of review, comment, and hearings must fully disclose that these permit changes were ordered by EPA due to USDOE illegally storing and disposing of wastes. The notice should disclose that wastes have leaked and explain the risks of prolonged storage in order to have truly informed participation.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 11e from Joan H Ward, Citizen, dated December 31, 2013

LLBG Trenches 31 & 34 - 4. The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford. Nor should they be allowed to add any more waste if leakage from disposal trenches is projected to contaminate groundwater.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Trenches 31 and 34 are RCRA-compliant trenches. They are fully lined and have leachate collection and removal systems.

Comment 11f from Joan H Ward, Citizen, dated December 31, 2013

General - Also, I can't help but point out the actual lack of "good faith efforts to comply" on the USDOE's part and seriously question the paltry sum of $136,000 as a penalty for such agreed acknowledgment of the seriousness of the violations, and would expect additional civil penalties.

Taken directly from Docket No.: RCRA-10-2013-0113:

4.3 In light of the seriousness of the violations, Respondent's good faith efforts to comply, Respondent's actions to correct the violation after having been notified by Complainant, Respondent's willingness to settle this matter without litigation, and in accordance with the RCRA Civil Penalty Policy, EPA has determined and Respondent agrees that an appropriate penalty to settle this action is one hundred thirty-six thousand dollars

($136,000).

4.12 Under section 3008(c) of RCRA, 42 U.S.C. 0928(0, a failure to take corrective action within the time specified in the Final Order may subject Respondent to additional civil penalties for each day of continued noncompliance.

I urge you! Do not approve a permit with no enforceable schedule and no deadline to remove wastes before 2030!!

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9). We also agree that closure plans need schedules. We are working with USDOE to resolve that issue prior to the next public comment period.

Comment 12 from Joe Mitter, Citizen, dated December 31, 2013

General - I am writing in support of the goals espoused by Heart of America NW. It is critical that reasonable timetables be established and that DOE continue to be pressured to remove hazardous nuclear wastes, and also to deal with the 68,000 of waste in containers which are currently failing or at risk of failing.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for the cited number of "68,000 drums." The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 13 from Judy Pigott, Citizen, dated December 29, 2013

General - I know I've commented before, yet prior to the end of 2013 I want to again say how crucial I believe it to be that clean up of nuclear waste at the Hanford site be accelerated rather than deferred or deemed unnecessary. With leaking wastes moving inexorably toward the Columbia River it would seem incongruous at best to add to the waste load or to ignore the issue.

The schedules for clean up have been adjusted to longer terms again and again, despite public comment and concern. To now move toward increased dumping and storage, toward disregard for clean up, and toward more environmental degradation is baffling to me.

Please do what is required to remove and treat the wastes that have already been stored at Hanford. Stop importing any more radioactive or chemical wastes from nuclear weapons production and energy facilities. Avoid disasters by recognizing that transportation alone has a high level of danger. And, lastly, move the cleanup schedules ahead!

Thank you for reading this. Thank you, in advance, for any actions you may take to help change the course of recent USDOE decisions that are contrary to these comments.

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9). We also agree that closure plans need schedules. We are working with USDOE to resolve that issue prior to the next public comment period.

Comment 14 from Laura Milner, Citizen, dated December 30, 2013

General to Ginger Wireman - Ms. Wireman, Laura Milner here. I was sorry to have missed your presentation to Rotary but I believe Debbie DeSoer from Rotary inquired as to whether you are available to speak to other groups. I am interested to know if you are available to speak to the League of Women Voters on either Wednesday March 12 for our lunch meeting or on Wednesday, April 16th for our 7:00 pm meeting. I don't know what you know about League but most people know us in the context of Candidate's Nights. We also are interested in various facets of policy and energy is one of those things we would like to know more about. Do let me know if any of

this works for you. If you interested, then I can call you and work out further details. For neither time would we be equipped to have a PowerPoint presentation, etc. We are a very informal group, a few handouts and a couple of talk points would suffice. Do let me know and enjoy the rest of your holidays (what is left of them). Kind regards, Laura

Ecology Response:

Thank you for your comment. This comment is out of the scope for this SWOC closure plan modification.

Comment 15 from Leah Boehm, Citizen, dated November 29, 2013

CWC-WRAP - I am very concerned that the notice from agencies failed to disclose that the Central Waste Complex and "WRAP" facilities which are subject of half the permit changes have 68,000 illegally stored drums of waste. Several have leaked in the past two years, including some which are illegally stored outside. Heart of America Northwest called on Ecology last year to include new permit conditions to require all wastes to be removed and treated within 3 years. That's generous, hazardous waste laws limit storage time to under a year before waste must be removed for treatment. Treatment facilities are available for these wastes, but USDOE won't pay for it until forced to.

Take care of it please.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" or basis for the cited number of "68,000 drums." The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 16 from Linda and Leonard Good, Citizens, dated December 29, 2013

General - We support Heart of America Northwest in their efforts to clean up Hanford. Please remove & treat waste, have public hearings, and don't add any more waste.

We need to protect Washington State, the ground water, and the Columbia River.

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9). Ecology Public Involvement is working on the hearing issue.

Comment 17 from Mark Bloome, Citizen, dated December 31, 2013

General – Subject: no more waste at Hanford

Why is ecology doing such a poor job in protecting the citizen's interests by allowing more waste into Hanford and not insisting that they clean it up.

no more waste at hanford [*sic*] the cleanup situation there is a joke. they are incompetent, just look at the vit [*sic*] plant!

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 18 from Michelle Devlaeminck, Citizen, dated December 30, 2013

General - Please make and follow a real timeline for cleaning up the Hanford waste. Try using NDTB-1 to transform the waste into an inert material instead of trying to transport it someone else for storage.

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9). We also agree that closure plans need schedules. We are working with USDOE to resolve that issue prior to the next public comment period.

Comment 19a from Michael and Annette Rose, Citizens, dated December 29, 2013

CWC-WRAP - Subject: Comments on USDOE's Proposed Changes to Hanford Hazardous Waste (RCRA) Permit for Central Waste Complex (CWC) and Low-Level Waste Burial Grounds Trenches 31 & 34. 1. The RCRA permit for the CWC should require USDOE to remove and treat ALL illegally stored wastes within 3 years. Within 3 years, Ecology should schedule the removal and treatment of the 68,000 drums of wastes stored illegally inside CWC, as well as remove and treat all of the waste stored outside.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" or basis for the cited number of "68,000 drums." The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 19b from Michael and Annette Rose, Citizens, dated December 29, 2013

General - 2. There should be public hearings across the region on the proposed changes, including a hearing here in Eugene. They should not be scheduled during holiday periods so as to prevent public attention.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 19c from Michael and Annette Rose, Citizens, dated December 29, 2013

General - 3. The public notice for the next round of review, comment and hearings must fully disclose that these permit changes were ordered by EPA due to USDOE illegally storing and disposing of wastes.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 19d from Michael and Annette Rose, Citizens, dated December 29, 2013

General – 4. As the recent mailed notice shows, USDOE and the Washington Department of Ecology have been disingenuous regarding government transparency. The notice should clearly disclose that wastes are sometimes mislabeled and have leaked and explain the risks of prolonged storage. In particular, we could locate no official maps of the Hanford site showing the locations of these areas and topographical correspondences. We were able to locate only a tiny blurry map with inadequate detail at the HoANW website. The citizenry cannot make decisions in the dark. This is a geologically active region. With the consequences of any large geological event halting hydroelectric energy production in the area with possible long down times. So more than just the citizenry will be in the dark; that energy capacity would be needed in the ensuing massive disaster cleanup and cooling of certain high-level waste. In addition, the location of streams and dammed reservoirs north of Hanford in an earthquake and active geological region leave storage at Hanford to place downstream municipalities, aquifers, fishing industry, water supplies and ecosystems at large risk. Hanford nuclear facilities located at the river edge, already jeopardize the public and human activities. Disaster cleanup personnel would be exposed to large radiation exposures; what part of society does the USDOE think of as expendable? The public think in terms of Three-mile Island, Chernobyl and Fukashima. It is incredulous that a President so interested in health issues should be so blind to this issue.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 19e from Michael and Annette Rose, Citizens, dated December 29, 2013

LLBG Trenches 31 &34 - 5. The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; and, if leakage from disposal trenches is projected to contaminate groundwater.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 20a from Mike Conlan, Citizen, dated December 31, 2013 and January 3, 2014

General - I have monitored the "progress" of the Hanford "cleanup" since my days at Gonzaga U, I graduated in 1971.

The Hanford "cleanup" would make a great black comedy – unfortunately as time has gone on, the "cleanup" has become more of a joke.

Now YOU and the rest of Department of Ecology have bent completely over, and let the USDOE & EPA turn Hanford into a political clusterfudge. Billions have been spent w/ little to show!

Ecology Response:

Thank you for your comment. This comment is out of the scope for this SWOC closure plan modification.

Comment 20b from Mike Conlan, Citizen, dated December 31, 2013 and January 3. 2014

No more radioactive waste – clean up all of the mess!!

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9). We also agree that closure plans need schedules. We are working with USDOE to resolve that issue prior to the next public comment period.

Comment 20c from Mike Conlan, Citizen, dated December 31, 2013 and January 3, 2014

Hanford needs the lights turned i.e., like Whale Wars or Most Wanted – if the general public got interested in how much has been spent and how little has been accomplished and the consequences of the inept handling of this huge amount of nuclear material - that is really the only way the Hanford mess is going to get cleaned up.

Ecology Response:

Thank you for your comment. This comment is out of the scope for this SWOC closure plan modification.

Comment 20d from Mike Conlan, Citizen, dated December 31, 2013 and January 3, 2014

Replace all the tanks before they leak more into the Columbia River!!

Ecology Response:

Thank you for your comment. This comment is out of the scope for this SWOC closure plan modification.

Comment 20e from Mike Conlan, Citizen, dated December 31, 2013 and January 3, 2014

CWC-WRAP - Here are some recommendations: 1) Remove and treat all illegally stored wastes within 3 years.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" for removing wastes. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 20f from Mike Conlan, Citizen, dated December 31, 2013 and January 3, 2014

General - 2) Demand public hearings for changes – so the general public understands what the consequences are of your proposed ineptness.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 20g from Mike Conlan, Citizen, dated December 31, 2013 and January 3, 2014

LLBG Unlined Trenches & Trenches 31 & 34 - 3) Stop all waste being added to open trenches.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 20h from Mike Conlan, Citizen, dated December 31, 2013 and January 3, 2014

General – How do you sleep at night?

Ecology Response:

Thank you for your comment. This comment is out of the scope for this SWOC closure plan modification.

Comment 21a from Mitchell Santine Gould, Citizen, dated January 1, 2014

CWC-WRAP - It is my understanding that the EPA wishes to impose restrictions on hazardous waste disposal at Hanford. As a resident of Portland, I absolutely must insist on the following

provisions:
1. DOE should be required to remove and treat all illegally stored wastes within 3 years

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" for removing wastes. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 21b from Mitchell Santine Gould, Citizen, dated January 1, 2014

General - 2. DOE must provide public hearings on any proposed changes to its permits for waste disposal. And these must be convenient to the citizens affected by Hanford.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 21c from Mitchell Santine Gould, Citizen, dated January 1, 2014

General - 3. DOE must notify the public that EPA wants to change DOE permits because DOE has been illegally storing and disposing of wastes. Such notice must explain the risks of the wastes that have leaked.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 21d from Mitchell Santine Gould, Citizen, dated January 1, 2014

General - 4. Hanford's new permit to dispose of waste must specifically bar the DOE from adding any more waste from offsite nuclear sources while existing wastes are illegally stored anywhere at Hanford.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 22a from Pam Borso, Citizen, dated December 31, 2013

CWC-WRAP - I am writing to ask the Washington State Department of Ecology to do the right thing and follow the laws on hazardous waste clean up and storage.

It is unconscionable that any consideration be given to any additional waste at Hanford until the current site is completely cleaned up.

There is material stored there illegally and containers leaking as well as unlined pits leaking.

The Hanford hazardous waste permit should require that all illegally and legally stored wastes be removed within three years on an enforceable schedule. This should include any waste inside as well as outside the Central Waste Complex.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Ecology is not aware of the basis for "three year requirement" for removing wastes. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 22b from Pam Borso, Citizen, dated December 31, 2013

General – In addition you should hold many public hearings for comment in various locations around the state, including my area near Bellingham.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 22c from Pam Borso, Citizen, dated December 31, 2013

The public notice for the next round of review, comment, and hearings must fully disclose that these permit changes were ordered by EPA due to USDOE illegally storing and disposing of wastes. The notice should disclose that wastes have leaked and explain the risks of prolonged storage.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 22d from Pam Borso, Citizen, dated December 31, 2013

LLBG Trenches 31 & 34 - The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; and, if leakage from disposal trenches is projected to contaminate groundwater.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 23a from Sandy Polishuk, Citizen, dated January 2, 2014

CWC-WRAP - This proposal fails to meet Washington state hazardous waste law rules which require that "closure" plans have specific enforceable schedules on which progress can be evaluated. "Eventually" is not sufficient. I ask that the USDOE obey the law and protect the residents of the NW as fully and quickly as possible from the dangers facing them from leaking tanks.

We need a schedule in writing.

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

We also agree that closure plans need schedules. We are working with USDOE to resolve that issue prior to the next public comment period.

Comment 23b from Sandy Polishuk, Citizen, dated January 2, 2014

CWC-WRAP - The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat ALL illegally stored wastes within 3 years.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" for removing wastes. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 23c from Sandy Polishuk, Citizen, dated January 2, 2014

General - We need public hearings and not just in the Tri-City area; citizens across the region are affected by this contamination and danger and deserve easy access to a hearing near their homes.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 23d from Sandy Polishuk, Citizen, dated January 2, 2014

General - We need full disclosure in the public notice that makes clear that wastes have leaked and explain the risks of waiting (long-term storage) rather than dealing with the problem now.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 23e from Sandy Polishuk, Citizen, dated January 2, 2014

General - We need for no more waste to be added to the site until existing waste stored at Hanford is taken care of according to the law.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 24a from Steven B. Hartholz, Citizen, dated December 29, 2013

General - State hazardous waste law rules require that "closure" plans have specific enforceable schedules on which progress can be evaluated (WAC 173-303-610). USDOE's proposal fails to meet this standard. Instead, USDOE's proposed "closure" plan merely says that eventually the wastes will be removed in keeping with a general deadline of the year 2030 in the Tri-Party Agreement. The rules also require that wastes be removed for treatment in under a year.

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

We also agree that closure plans need schedules. We are working with USDOE to resolve that issue prior to the next public comment period.

Comment 24b from Steven B. Hartholz, Citizen, dated December 29, 2013

For these illegally stored wastes, commercial treatment of the hazardous wastes with which they are mixed, is available at the Perma-Fix NW treatment facility adjoining Hanford. USDOE has failed to ask Congress to fund removal and treatment. If included in the permit, USDOE will be required to ask Congress for the funding to meet the closure plan schedule.

Ecology Response:

Thank you for your comment. This comment is out of the scope for this SWOC closure plan modification.

Comment 24c from Steven B. Hartholz, Citizen, dated December 29, 2013

Why didn't the notice sent by USDOE and Washington Ecology disclose that the proposal is the result of an EPA Order due to USDOE's illegal storage and disposal of wastes?

Ecology Response:

Thank you for your comment. For this comment period, USDOE decided what information to include. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 24d from Steven B. Hartholz, Citizen, dated December 29, 2013

I am asking the DOE and the Washington State Department of Ecology to obtain funding and clean up all nuclear waste from Hanford, in accordance with Federal Statute.

Ecology Response:

Thank you for your comment. This comment is out of the scope for this SWOC closure plan modification.

Comment 25 from Joyce Namba, Citizen, dated January 6, 2014

General - It just does not seem to end. The delays. I still recall how Leslie Stahl from CBS 60 Minutes ran a story and then a follow up story for her network on Hanford. Her opinion about the cleanup was not very pretty.

I hope you will take to heart the messages from many who will email you with their concerns. Decisions must be made looking at impact 100 years + to our environment, livability. Many citizens have died overseas since 2001 in an effort to protect our ability to live a healthy, happy life with great liberties. Let's not forget our response to their sacrifice. Let's do what is right to protect our west coast, United States, Earth and wellness of those on this Earth.

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 26 from Boni Biery, Citizen, dated January 6, 2014

General - I am writing to request that dumping of any more toxic waste at Hanford be stopped now and that all the waste that has accumulated over the decades be responsibly addressed immediately. It is unbelievable to me that this life-threatening situation continues.

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 27a from Meredith Crafton and Tom Carpenter, Hanford Challenge, dated January 6, 2014

LLBG Trenches 31 &34 - I. The Washington State Department of Ecology fact sheet on the Class 3 Permit Modification should have informed the public of the illegal storage of waste and the EPA CAFO.

First, it is important to point out that these proposed permit modifications are a result of a June 26, 2013 U.S. Environmental Protection Agency Consent Agreement and Final Order (Docket No: RCRA-10-2013-0113) requiring initiation of closure of several Hanford Site Dangerous Waste Management Units which had been operating out of compliance. This important context was not acknowledged in the public notice and "Fact Sheet." DOE was charged with storing RCRA regulated dangerous waste without a permit or interim status in violation of Section 3005 of RCRA, 42 U.S.C. § 6925, WAC 173-303-800, and Condition I.A. of the Hanford Facility RCRA Permit. DOE was also charged with failure to comply with Land Disposal Restriction requirements when in 2010 it disposed of 52 mixed dangerous waste/low-level waste (MLLW) high-temperature gas reactor (HGTR) drums in Trench 34, and subsequently disposed of eight (8) (MLLW) high-temperature gas reactor boxes and two (2) MLLW drums in Trench 34 without first satisfying applicable treatment standards. Some of these drums and boxes have leaked and many have been stored out of compliance for years.

The Department of Ecology should have clearly informed the public that this permit modification was a legal requirement of the DOE due to its illegal storage and treatment of dangerous waste. During any subsequent comment periods and public meetings on these modifications, we request that Ecology clearly inform the public of the illegal actions of the Department of Energy and explain what Ecology is actually doing to ensure the illegally stored waste is properly removed and treated. The public notice for the next round of review, comment, and hearings should fully disclose that permit changes were ordered by EPA due to the DOE illegally storing and disposing of wastes.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 27b from Meredith Crafton and Tom Carpenter, Hanford Challenge, dated January 6, 2014

CWC-WRAP, T-Plant, LLBG "TSDFs" - II. The piecemeal permit modification process and interim permitting must change. This piecemeal and interim permitting process needs to end. It is not sufficiently protective of public health and the environment, does not sufficiently inform the public, and arguably is not legally compliant. In 2012, Ecology issued a draft permit for the dangerous waste management units addressed in this current permit modification request. Hundreds of comments were submitted requesting DOE comply with WAC 173-303 regulations for operation of facilities which treat, store, and dispose of wastes and closure [including removal of illegally stored waste] of illegally operating units on the Hanford site. A complete permit is still many years away, and insufficient permitting continues to complicate the regulatory pathways for permit modifications and the public review of related documents. "Partial permitting" of the CWC, T Plant, and WRAP LLBG TSDFs should not be allowed. These Treatment, Storage or Disposal facilities (TSDFs) have not had a place in Rev 8(c) of Hanford's RCRA Permit and have never been fully assessed. Ecology must ensure that USDOE submit a complete Part B Application for CWC/WRAP, T-Plant, and the LLBGs that are currently operating without a permit. Ecology needs to ensure that DOE meets all the requirements for Final Facility Permits WAC 173-303-806 for each TSD Unit. The current piecemeal approach gives DOE continued noncompliant operation. If these modifications are accepted DOE continues to operate without a Waste Analysis Plan, Process Information or Ground Water Monitoring Plans (for the land disposal units). Ecology should demand these plans and the public deserves more information.

Part A forms for the proposed permit modifications for unit closures cannot authorize any treatment, storage, or disposal of dangerous mixed wastes except as specifically identified by the approved closure plan. Any authorization for treatment, storage, or disposal in a new Dangerous Waste Management Unit must be in accordance with a permit modification request per WAC 173-303-830/840 and include the information required in the Part A and Part B permit application. (E.g., Placement of [storing] containers next to LLBG trenches is not in compliance with WAC 173-303-140(4)-Dangerous Waste regulations as this allows a non-compliant RCRA design in-lieu of building a compliant storage facility.)

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9). The next permit revision (Rev.9) will also address these comments.

Comment 27c from Meredith Crafton and Tom Carpenter, Hanford Challenge, dated January 6, 2014

General - Addenda B, C, D - - III. The Hanford RCRA Permit should require DOE to remove and treat all illegally stored waste and Ecology should require DOE to submit a Waste Analysis Plan,

Process Information, Ground Water Monitoring Plans, and a specific enforceable schedule for meeting compliance.

The Hanford RCRA permit should require DOE to remove and treat ALL illegally stored wastes. State hazardous waste law rules require that "closure" plans have specific enforceable schedules on which progress can be evaluated (WAC 173-303-610). DOE's proposal fails to meet this standard. The submitted Closure Plans fail to compel DOE to do work now. The proposed schedule and listing of Tri-Party Milestones [acknowledging a general TPA agreement for removal by 2030] does not fulfill WAC 173-303-610 requirements. Closure plans must comply with the WAC 173-303-610 requirements and do not 'simply represent a baseline for closure' as stated. WAC 173-303-610(3)(iv thru vi) requires more information and details that have not been included in the submitted Closure Plans. DOE's closure plans lack detailed descriptions of steps needed to remove or decontaminate all dangerous waste residues and contaminated containment system components, equipment, structures and soils, including methods for sampling and testing of surrounding soils and criteria for determining the extent of decontamination required to satisfy the closure performance standards.

Ecology should require DOE to submit a Waste Analysis Plan, Process Information, Ground Water Monitoring Plans, and a specific enforceable schedule for meeting compliance.

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

We agree that closure plans need detailed schedules for closure operations. We are working with USDOE to resolve that issue prior to the next public comment period.

Comment 27d from Meredith Crafton and Tom Carpenter, Hanford Challenge, dated January 6, 2014

LLBG Unlined Trenches and Trenches 31 & 34 - IV. All "trenches" are subject to Dangerous Waste Regulations and should be recognized as such.

Low Level Burial Ground Part A Application(s) prior to this included all of the burial grounds not just Trenches 31, 34 and 94. DOE must continue to follow RCRA Requirements for all LLBGs. The Part A form should at least identify, and does not, all LLBG trenches as subject to Dangerous Waste Regulations until such time that characterization (including actively digging up waste to be able to conduct sampling) demonstrates it is <u>not</u> RCRA waste.

Ecology Response:

Thank you for your comment. All burial ground trenches are not subject to RCRA requirements. Currently only Trenches 31, 34, and 94 are designated as mixed (dangerous and radioactive waste) waste trenches. The other burial grounds are out of the scope for this SWOC closure plan modification.

Comment 27e from Meredith Crafton and Tom Carpenter, Hanford Challenge, dated January 6, 2014

LLBG Trenches 31 & 34 and General - V. The Hanford RCRA permit should specifically bar DOE from adding offsite wastes to the trenches.

The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; and, if leakage from disposal trenches is projected to contaminate groundwater. Furthermore, Trenches 31 &34 are twenty years past their *intended operational life*.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 27f from Meredith Crafton and Tom Carpenter, Hanford Challenge, dated January 6, 2014

LLBG Trenches 31 and 34 and 94 - VI. Combining Trenches 31 and 34 with 94 appears problematic**.**

Combining Trenches 31, 34 and 94 together as one Operating Unit Group (OUG) makes little sense and is problematic. Geographically 31 and 34 are in 200 West and DOE is proposing to treat "debris" on asphalt pads adjacent to the disposal trench for mixed waste. Trench 94 is located in 200 East and stores decommissioned navy nuclear reactors. Groundwater science for these two areas and practices is very different and requirements have not been addressed. Ground Water Plans and Waste Analysis Plans for these trenches will be extremely different and should not be combined.

Ecology Response:

Thank you for your comment. It is the Permittee's choice how they determine Dangerous Waste Management Units; they will have separate permit documentation for 31/34 and 94.

Comment 27g from Meredith Crafton and Tom Carpenter, Hanford Challenge, dated January 6, 2014

CWC-WRAP - VII. Combining CWC and WRAP into on Operating Unit Group make public review and oversight very difficult.

Previously, CWC and WRAP were managed as separate OUGs. The primary mission and operational capabilities of the facilities are different. Combining these two facilities into one unit makes public reviews very difficult. The continued mismanagement of containers [e.g., labeling discrepancies and non-permitted storage of dangerous waste] is a significant issue and the closure plans for these areas is full of discrepancies. The submitted closure plans need reviews for accuracy & consistency with Part A forms. There are inconsistencies between units listed on Part

A forms and Closure Plans; inconsistencies in measurement units between Part A forms and Closure Plans; inconsistencies with design capacities and total volumes of waste, etc.

Furthermore, without access to the 2004 Permit Applications and the current RCRA Permit Rev. 8C, the public cannot fully determine if information presented within these modification documents is accurate or legally authorized.

Ecology Response:

Thank you for your comment. It is the Permittee's choice how they determine Dangerous Waste Management Units; the supporting permit documentation will have to address the DWMU(s) in each area. Ecology will ensure that the permit protects human health and the environment. It will also be addressed in the next permit revision (Rev.9).

Ecology also noted the discrepancies in measurement units and design/treatment capacities. We are working through these issues with the USDOE before these documents go through further review and approval.

Comment 27h from Meredith Crafton and Tom Carpenter, Hanford Challenge, dated January 6, 2014

General – Inspection Plans - VIII. The Inspection Plans are insufficient and noncompliant. We have not seen any documentation to support a claim that these facilities are in *safe configuration.* Until closed, facility inspections must be done per WAC 173-303 regulations (e.g., daily inspections of spill areas; tanks require daily visual inspections). DOE did not apply all Dangerous Waste Laws as required, and there are no sections on container receipt and inspection or non-acceptable waste shipment within the Inspection or Closure Plans. With the history of noncompliance, Ecology must require and follow through with stringent inspection plans.

Ecology Response:

Thank you for your comment. We agree that closure plans need to cover inspections during closing operations. We are working with USDOE to resolve that issue prior to the next public comment period.

Comment 27i from Meredith Crafton and Tom Carpenter, Hanford Challenge, dated January 6, 2014

General – Personnel Training Plans - IX. Personnel Training Plans are also insufficient.

The proposed plan should be structured to reflect both closing CWC closing units and operational units to comply with WAC 173-303-330 requirements. These plans further the idea that only trenches in the LLBG are Trenches 31, 34, and 94 and that CWC & WRAP have authority to be designated as one facility. As mentioned above, this is problematic.

The training matrix tables do not include all necessary personnel such as a building emergency director, regulatory compliance specialists, or groundwater samplers. The Operations Supervisor should be trained in all areas and additional trainings should be required for other listed personnel, including inspectors and groundwater samplers.

Ecology Response:

Thank you for your comment. We agree that closure plans need to cover training for personnel performing closure operations. We are working with USDOE to resolve that issue prior to the next public comment period.

Comment 27j from Meredith Crafton and Tom Carpenter, Hanford Challenge, dated January 6, 2014

General - X. DOE has failed to demonstrate good faith or instill confidence that it will take steps to prevent threats to human health and the environment.

Operational history at these facilities fails to substantiate DOE's claim to have demonstrated it has (or will) take steps to prevent threats to human health and the environment including compliance requirements. These dangerous waste management units have already failed and been so poorly managed so as to result in releases to soils and the environment. To name a few of many examples: the floor of Room 152 is sealed concrete and does not provide secondary containment; Dangerous waste containers meeting the criteria specified in WAC 173-303-630(7)(c) are stored on standard pallets to ensure elevation off of the concrete floor; Dangerous waste packages not meeting the criteria specified in WAC 173-303-630(7)(c) (e.g., waste package containing free liquids) are placed on portable spill containment equipment such as spill pallets meeting the criteria specified in WAC 173-303-630(7)(a) and (b) while 7(c) bars free liquid storage in noncompliant facility storage.

Ecology Response:

Thank you for your comment. Ecology acknowledges the inherent risks from continued storage. That is why the SWOC units are being brought into the Revision 8c permit under the CAFO and Agreed Order requirements.

Comment 27k from Meredith Crafton and Tom Carpenter, Hanford Challenge, dated January 6, 2014

General – Addenda B, C, and, and Part B Application for CWC-WRAP, T-Plant, and LLBG - Conclusion

The Department of Ecology should require enforceable schedules to remove and treat waste illegally stored at Hanford. Units which are easily and safely accessible should not delay or defer required closure actions subject to TPA Milestones. The practice of illegally storing waste must end. DOE's Permit Modification and Closure plans do not provide sufficient information for the public or regulators to make informed decisions. This history of noncompliance and environmental releases in these areas must be acknowledged and remedied.

Ecology should ensure that DOE submit a complete Part B Application for CWC/WRAP, T-Plant, and the LLBGs that are currently operating without a permit. Ecology needs to ensure that DOE meets all the requirements for Final Facility Permits WAC 173-303-806 for each TSD Unit.

The current piecemeal approach gives DOE continued noncompliant operation. If these modifications are accepted, DOE will continue operating without a Waste Analysis Plan, Process

Information or Ground Water Monitoring Plans (for the land disposal units). The public deserves more information and more accountability.

Ecology Response:

Thank you for your comment. We agree that closure plans need detailed schedules for closure operations. We are working with USDOE to resolve that issue prior to the next public comment period.

The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. It also requires that the remainder of the required permit materials be submitted for the current RCRA permit (Rev.8c). The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 28a from Nancy Morris, Citizen, dated January 6, 2014

General - Re: Proposed changes to the Hanford Hazardous Waste Permit for the CWC and low level waste burial grounds trenches 31 & 34.

It is imperative that citizens of Washington and Oregon have the right to comment on the new proposal by the USDOE, which will allow the USDOE to truck more radioactive waste to the Hanford Reservation and once again ignore a timely schedule of cleanup for the dangerously stored radioactive waste already at the Hanford Reservation. These hearings need to be held in densely populated cities such as Seattle, Spokane, and Portland, besides smaller cities like Richland. Failure to provide hearings gives the impression, apparently to Ecology and the USDOE, that no one cares. If no one knows what is going on, that is a good strategy to keep attendance down and outrage unvoiced.

After all the hundreds of comments given by people in 2012 regarding Hanford cleanup, it appears that Ecology plans to ignore these well thought out concerns and suggestions to follow the more dangerous and outrageous proposal from the USDOE. We need a timely and enforceable schedule of cleanup at Hanford with the necessary funding provided, which the USDOE proposal does not provide. No more delays and no more excuses.

To enumerate what needs to happen, please read the following and please honor the requests by the people of Washington and Oregon. What you decide this year will affect many thousands of people for generations to come:

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Ecology Public Involvement is working on the hearing issue.

The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 28b from Nancy Morris, Citizen, dated January 6, 2014

CWC-WRAP - 1.The Hazardous Waste permit for the Central Waste Complex (CWC) must require the USDOE to remove and treat all illegally stored wastes within 3 years with a countdown from winter, 2014. Ecology needs to include a schedule for removing and treating the 68,000 drums of wastes currently stored illegally inside the CWC within 3 years along with a schedule for removing and treating all of the waste stored outside that area.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" or basis for the cited number of "68,000 drums." The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 28c from Nancy Morris, Citizen, dated January 6, 2014

General - 2. Public Hearings need to be held in major state cities, along with the tri-city area.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 28d from Nancy Morris, Citizen, dated January 6, 2014

General - 3. Full disclosure of permit changes that were ordered by the EPA due to the USDOE still illegally storing and disposing of wastes. This needs to include discussion that highly toxic waste has leaked and complete explanations of the risks for continued illegal storage to the Columbia River and the entirety of Washington and Oregon.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 28e from Nancy Morris, Citizen, dated January 6, 2014

General – Trenches 31 & 34 - 4. The Hanford RCRA permit should specifically bar USDOE from adding any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally store anywhere at the Hanford Reservation. If leakage from disposal trenches is projected to contaminate groundwater, this too will bar the USDOE from adding any more radioactive and/or toxic waste to these sites.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of

Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 28f from Nancy Morris, Citizen, dated January 6, 2014

General - 5. Hanford truly needs more monitoring and oversight from its own technical staff. These staff members should be protected from harassment and threats of losing their position should these staff members continue to report that the USDOE is illegally storing radioactive waste and not treating the leakage from tanks as the true emergency it is.

Ecology Response:

Thank you for your comment. This comment is out of the scope for this SWOC closure plan modification.

Comment 29 from Nancy Matela, Citizen, dated January 6, 2014

General - I protest the proposed plan to clean up the Hanford waste! The law says any plan to deal with hazardous waste must have deadlines. The Tri-Party Agreement set out the big picture of deadlines. The DOE must comply with those and state specifically what it is going to do when within those deadlines set 25 years ago. We the residents of southeast Washington and down the Columbia River to the ocean demand that the government clean up our place where we and our children live, work and play.

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 30a-1 from Russell Jim, Yakama Nation, dated January 6, 2014

General – Interim Status, CWC, LLBG - Interim Status Standards & the RCRA Permit:

1. Ecology has stated "Prior to the issuance of the permit in 1994, Hanford Site TSD units operated under interim status- a status provided for under RCRA, which grants a Facility the right to continue to operate in accordance with applicable RCRA or state regulations until a RCRA final status permit is issued. Any TSD unit not included in the initial Permit, which became effective in 1994, was to be incorporated through a permit modification process (a change control process defined in WAC 173-303-830). This process was initiated by the submittal of a Part B permit application, closure plan, closure/ post-closure plan, and/or post-closure permit application in accordance with WAC 173-303-610, -803, -806. The TSD units not yet incorporated into the original Permit were to continue to operate under interim status requirements WAC 173-303-400." All modification documents support DOE's continued RCRA operations under Interim Status Standards despite violations of WAC 173-303-400 and -805 requirements.

However, under EPA/DOE Consent Agreement and Final Order (CAFO No. RCRA-10-2013-0113), DOE was charged with failure to comply with Land Disposal Restriction [WAC 173-303-140] at the Low-level Burial Grounds Trenches 34. This is a clear violation of the Interim Status standards of WAC 173-303-400(3)(i) and the WAC 173-303-805 requirements. All operations for all Hanford site units operating under interim status standards should cease immediately and until such time they are fully permitted under WAC 173-303-806, including for closure of the CWC, T-Plant and LLBG storage areas as required pursuant to the EPA Order. Continued operations under interim status standards should be subject to RCRA final status permit requirement violation penalties.

Ecology Response:

Thank you for your comment. The EPA CAFO and the Ecology Agreed Order specify requirements for managing the waste at SWOC at this time. As part of both documents, permit applications will be submitted and these units will be brought into the Revision 8c under final status. The requirements of the Agreed Order will also be included in the next permit revision (Rev.9).

Comment 30a-2 from Russell Jim, Yakama Nation, dated January 6, 2014

General – Interim Status, CWC, LLBG - Furthermore, we request Ecology bar any offsite waste shipments to CWC and/or LLBG. We request EPA to also bar any offsite waste shipments to the Hanford site CWC and LLBG facilities under the CERCLA offsite waste rules [40 CFR 300.440(a)] due to these substantial violations.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 30b from Russell Jim, Yakama Nation, dated January 6, 2014

General – Compliance of TSDs with regulations - 2. While the documents are intended for the purpose of closure of illegal TSD units, they also list other storage and/or treatment DWMUs which are or could be by the public, considered to be permitted facility units. This list of units should not be construed to be compliant with WAC 173-303-container/containment building/storage area/tank/miscellaneous unit regulations.

Ecology Response:

Thank you for your comment. Part A's were submitted with the CAFO required closure plans. The Part As are still under review by Ecology and will not be put out for further public comment until the rest of the permit materials are submitted to Ecology.

Comment 30c from Russell Jim, Yakama Nation, dated January 6, 2014

General – Piecemeal approach to permitting - 3. Ecology issued a draft permit for these units in 2012. Hundreds of comments were submitted requesting DOE comply with WAC 173-303 regulations for operation of facilities which treatment, storage, and disposal of wastes and closure [including removal of illegally stored waste] of illegally operating units on the Hanford site. Delays in issuing a permit only complicate the regulatory pathways for these types of modifications and the public review of related documents. This piecemeal approach to permitting on the Hanford site should not continue.

Ecology Response:

Thank you for your comment. The next permit revision (Rev.9) will address these comments.

Comment 30d from Russell Jim, Yakama Nation, dated January 6, 2014

General – SEPA - SEPA: 1. The SEPA regulations state that SEPA evaluations are to occur in conjunction with licensing/permitting activities [197- ll-030(2)(e)]. DOE's SEPA checklist submitted to Ecology should be included in this modification request for public review. The SEPA checklist evaluates the impacts of the proposal as presented/documented in the dangerous waste permit application/permit modification request.

Ecology Response:

Thank you for your comment. Ecology will perform a SEPA evaluation; this accompanies the proposed draft permit. The SEPA checklist is not in the Permittee's part of the Class 3 Modification, it is in the Ecology part and will be included in the next public comment period.

Comment 30e from Russell Jim, Yakama Nation, dated January 6, 2014

General – Part A Forms - Part A forms: 1. The Part A Form seems to be considered as establishing permit conditions. The sections in the Part A must not be taken to provide any changes in authorization for any DWMU that may be operating under Permit Condition I.A.l.

Ecology Response:

Thank you for your comment. Ecology agrees; just listing Dangerous Waste Management Units (DWMUs) in the Part A does not mean they have permitted status. When the Part A permit modification is approved and issued under Rev.8c, the listed DWMUs will have permitted status.

Comment 30f from Russell Jim, Yakama Nation, dated January 6, 2014

General – Part A Forms - LLBG - Example#1: The Part A form should identify and does not, all LLBG trenches as subject to Dangerous Waste Regulations until such time that characterization (including actively digging up waste in support of sampling) demonstrates it is not RCRA waste. As previously noted, this facility is not in compliance with WAC 173-303-400 requirements.

• With the first submittal of the Part A for interim status in 1985, the U. S. Department of Energy (DOE) declared the process codes and capacities, dangerous waste codes, and unit boundaries for the Low Level Burial Grounds (LLBG).

• As a RCRA Treatment, Storage, and Disposal (TSD) facility, hazardous waste became regulated under Washington's Hazardous Waste Management Act, Chapter 70.105 of the Regulatory Code of Washington (RCW). RCW 70.105.109 provides that: "The Department of Ecology may regulate all hazardous wastes, including those composed of both radioactive and hazardous components, to the extent it is not preempted by federal law."

• The waiver of sovereign immunity, 42 U.S. Code (U.S.C.) paragraph 6961 (a) states in pertinent part as follows: "Each department, agency, and instrumentality of the executive, legislative, and judicial branches of the Federal Government (I) having jurisdiction over any solid waste management facility or disposal site, or (2) engaged in any activity resulting, or which may result, in the disposal or management of solid waste or hazardous waste shall be subject to, and comply with, all Federal, State, interstate, and local requirements, both substantive and procedural (including any requirement for permits or reporting or any provisions for injunctive relief and such sanctions as may be imposed by a court to enforce such relief), respecting control and abatement of solid waste or hazardous waste disposal and management in the same manner, and to the same extent, as any person is subject to such requirements, including the payment of reasonable service charges ... The United States hereby expressly waives any immunity otherwise applicable to the United States with respect to any such substantive or procedural requirement (including, but not limited to, any injunctive relief, administrative order or civil or administrative penalty or fine referred to in the preceding sentence, or reasonable service charge)." The wording of the waiver located at 42 U.S.C. paragraph 6961 was amended, of course, in the Federal Facilities Compliance Act of 1992.

However, the operative language of the waiver-- "each department of the Federal Government shall be subject to, and comply with, all ...State requirements" - has been in the statute since 1978. There should be no categorizations for TRU wastes disposed at Hanford.

Ecology Response:

Thank you for your comment. All burial ground trenches are not subject to RCRA requirements. Currently only Trenches 31, 34, and 94 are designated as mixed (dangerous and radioactive waste) waste trenches. The other burial grounds are out of the scope for this SWOC closure plan modification.

Comment 30g from Russell Jim, Yakama Nation, dated January 6, 2014

General – Part A Forms - Associated issues:

• Whether or not any new information gathered (without actual characterization) will substantiate the claims of non-use, and the closure of a sub-portion (i.e. the 'unused trenches') of a subunit (i.e. the LLMW Burial Grounds TSD) independent and to different closure standards of the rest of the facility (i.e. the entire Hanford Facility under the RCRA permit).

• References to acceptance or potential acceptance of Off-site waste at LLBG Trenches 31 & 34. Off-site wastes should not be permitted to be buried on the Hanford site until a cumulative Risk Assessment indicates there will be no exceedances of groundwater cleanup standards.

• Under the federal superfund statute, a unit, or burial ground, at a facility, such as the Hanford Reservation, may only receive off-site waste if the facility is operating in compliance with relevant federal and state law [CERCLA 12l(d)(3), 42 U.S.C.A. § 9621(d)(3)]. To satisfy this standard, the

unit must not be releasing any waste *and* any releases at units elsewhere in the facility must be controlled by a corrective action program [CERCLA 121(d)(3), 42 U.S.C.A. § 9621(d)(3)].

• SEPA requirements/coverage for authorization of acceptance of offsite waste has yet to be met.

• Trenches 31 & 34 are twenty years pass their *intended operational life.*

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

The SEPA checklist will be included in Ecology's public comment review.

Comment 30h from Russell Jim, Yakama Nation, dated January 6, 2014

General Part A Forms – CWC-WRAP - Example #2: Integration of CWC-WRAP into one facility. Previously, CWC and WRAP were managed as separate OUGs. The primary mission and operational capabilities are different. Combining these two facilities into one unit makes public reviews very difficult. At issue is the continued mismanagement of containers [e.g., labeling discrepancies and non-permitted storage of dangerous waste].

Ecology Response:

Thank you for your comment. It is the Permittee's choice how they determine Dangerous Waste Management Units; the supporting permit documentation will have to address the DWMU(s) in each area. Ecology will ensure that the permit protects human health and the environment. It will also be addressed in the next permit revision (Rev.9).

Comment 30i from Russell Jim, Yakama Nation, dated January 6, 2014

General – Part A Forms – LLBG Trenches - 2. The Part A forms for the proposed permit modifications for unit closures cannot authorize any treatment, storage, or disposal of dangerous mixed wastes except as specifically identified by the approved closure plan. Any authorization for treatment, storage, or disposal in a new DWMU must be in accordance with a permit modification request per WAC 173-303-830/840 and include the information required in the Part A and Part B permit application.

Example: Supporting placement of [storing] containers next to LLBG trenches. Language such as this is not in compliance with WAC 173-303-140(4) Dangerous Waste regulations. WAC 173-303-630 regulations apply. To agree to this activity would allow use of a non-compliant RCRA design in-lieu of requiring DOE build a compliant storage facility.

Ecology Response:

Thank you for your comment. The EPA CAFO required submittal of closure plans for the Dangerous Waste management Units operating without approval. The Part As are still under review by Ecology and will not be put out for further public comment until the rest of the permit materials are submitted to Ecology.

Trenches 31, 34, and 94 are RCRA-compliant trenches. There is no storage of containers next to these three trenches. The pads at the top of Trenches 31 and 34 are proposed as areas were waste can be temporarily staged in preparation for final placement in the trenches.

Comment 30j from Russell Jim, Yakama Nation, dated January 6, 2014

General – Part A Forms – Inconsistencies - 3. Part A inconsistencies: Closure Plans need reviews for accuracy & consistency with Part A forms; inconsistency between units listed on Part A forms and Closure Plans; inconsistency in measurement units between Part A forms and Closure Plans; design capacities and total volumes of waste, etc.

Ecology Response:

Thank you for your comment. Ecology also recognized this issue in the Part A submittals and is working with DOE to resolve those inconsistencies.

Comment 30k from Russell Jim, Yakama Nation, dated January 6, 2014

General – Part A Forms - 4. Without access to the 2004 Permit Applications and the current RCRA Permit Rev. 8C, the public cannot fully determine if information presented within these modification documents is accurate or legally authorized under WAC 173-303 (e.g. 2236-W outside container storage area was not identified in application for renewal).

Ecology Response:

Thanks you for your comment. The public can request information through Public Disclosure.

Comment 30l from Russell Jim, Yakama Nation, dated January 6, 2014

General – Inspection Plans - Inspection Plans: l. Documents cite several Part II Permit Conditions: Rev 8C is not available for public review. These may not be sufficient and require revisions themselves.

Ecology Response:

Thank you for your comment. The Rev.8c Part I and II permit conditions are available online. The other portions of the permit are available for review in the Ecology office library.

Comment 30m from Russell Jim, Yakama Nation, dated January 6, 2014

General – Inspection Plans - 2. No documentation (or characterization) is provided to support claim that these facilities are in *safe configuration* (or in proper storage) as stated. In fact, history at the Hanford site has shown leakage from drums/containers designated as "debris" which by definition are dry without any free, leakable liquids. Until closed, facility inspections must be done per WAC 173-303 regulations (e.g., daily inspections of spill areas; tanks require daily visual inspections). Units should not be designated as" in safe configuration."

Not all WACs are applied as required or fully applied. The inspections and inspection schedule should meet all the requirements of WAC 173-303-320 and applicable items and frequencies

required for the specific waste management method describe in WAC 173-303-630 thru WAC 173-303-680, and 40 CFR 264.1033, 264. 1052, 264.1053, 264.1058, and 264.1083 through 264.1089 for final status facilities and the requirements in the approved Closure Plan.

Ecology Response:

Thank you for your comment. Ecology agrees; the information in this comment has been addressed by the Agreed Order issued January 24, 2014. This information will also be included in the next permit revision (Rev.9).

Comment 30n from Russell Jim, Yakama Nation, dated January 6, 2014

General – Inspection Plans - 3. No Sections on Container Receipt and Inspection and non-acceptable waste shipment within the Inspection or Closure Plans rendering these documents incomplete.

Ecology Response:

Thank you for your comment. Ecology agrees; this will be addressed in the next permit revision (Rev.9) Addendums B and C. Inspection requirements for closure activities have been included in the closure plan.

Comment 30o from Russell Jim, Yakama Nation, dated January 6, 2014

General – Personnel Training Plans - Personnel Training Plans:

l. Documents are structured to reflect only training for personnel dealing with sub-units which are closing and deemed to be with or without having any dangerous waste present.

Unless there are different training plans [i.e., operating units] then this plan should be structured to reflect both closing units and operational units to comply with WAC 173-303-330 requirements.

Ecology Response:

Thank you for your comment. Ecology agrees that the training plans need work. This will be addressed as part of the next permit revision (Rev.9), as this addendum was not required by the EPA CAFO. Training requirements for performing closure activities have been included in the closure plans.

Comment 30p from Russell Jim, Yakama Nation, dated January 6, 2014

General – Personnel Training Plans - 2. Rev 8C Permit Attachment 5 is stated as describing the specific requirements of the personnel training program, but is not available for public review. Attachment 5 may not be sufficient and also require revision.

Ecology Response:

Thank you for your comment. The other portions of the permit are available for review in the Ecology office library. The public can also request information through Public Disclosure.

Comment 30q from Russell Jim, Yakama Nation, dated January 6, 2014

General – Personnel Training Plans - 3. The statement "The SWOC Closure Units Dangerous Waste Training Plan (DWTP) provides a complete description of the personnel training requirements" is misleading. This Addendum is the Personnel Training Plan. Alone, it does not fulfill compliance with WAC 173-303-330(2)(a) and (b).

Ecology Response:

Thank you for your comment. Ecology agrees that the training plans need work. This will be addressed as part of the next permit revision (Rev.9), as this addendum was not required by the EPA CAFO. Training requirements for performing closure activities have been included in the closure plan.

Comment 30r from Russell Jim, Yakama Nation, dated January 6, 2014

General – Personnel Training Plans - 4. Misleading statements are made which support the premise that what is designated on the Part A form reflects permit conditions (e.g., "The LLBG Trench 31-34-94 closure unit where dangerous waste containers are no longer present is FS-1" and "The Permittees will comply with the following training matrix, which provides training requirements for Hanford Facility personnel associated with the Solid Waste Operations Complex (SWOC) Central Waste Complex Waste Receiving and Processing Plant (CWC-WRAP) closures.") This falsely states the premise that only these three trenches are the LLBG and that that CWC & WRAP have authority to be designated as one facility.)

Ecology Response:

Thank you for your comment. It is the Permittee's choice how they determine DWMUs; they will have separate permit documentation for 31/34 and 94 and for CWC and WRAP. Also, all burial ground trenches are not subject to RCRA requirements. Currently only Trenches 31, 34, and 94 are designated as mixed (dangerous and radioactive waste) waste trenches. The other burial grounds are out of the scope for this SWOC closure plan modification.

Comment 30s from Russell Jim, Yakama Nation, dated January 6, 2014

General – Personnel Training Plans - 5. Training matrix tables do not include all necessary personnel (e.g. Building Emergency Director, Regulatory Compliance [unless that position is included in the ECO position], groundwater samplers). The Operations Supervisor should be trained in all areas. Additional trainings should be required for other listed personnel as well.

Ecology Response:

Thank you for your comment. These positions are discussed in each facility training plan. Training requirements for performing closure activities have been included in the closure plan.

Comment 30t from Russell Jim, Yakama Nation, dated January 6, 2014

General – Personnel Training Plans - 6. Additional trainings for surveillance personnel [including inspectors and groundwater samplers] should be required.

Ecology Response:

Thank you for your comment. Facility training plans address these requirements. Training requirements for performing closure activities have been included in the closure plan.

Comment 30u from Russell Jim, Yakama Nation, dated January 6, 2014

General – Closure Plans - Closure Plans:

I. Scrutiny of Closure Plans show there is nothing in them which compel DOE to do work now (i.e., there is nothing in these Closure Plans [including in descriptive/ informational sections] which compel to have a schedule to remove, treat and dispose of all illegally stored wastes at CWC).

The proposed schedule and listing of Tri-Party Milestones [acknowledging a general TPA agreement for removal by 2030] does not fulfill WAC 173-303-610 requirements to have a detailed, complete closure plan to include a specific detailed closure activity schedule with complete removal of wastes in 180 days. The TPA schedule is even beyond the next Permit re-application cycle. DOE is not in compliance with EPA's CAFO-No. RCRA-10-2013-0113 to submit complete closure plans per WAC I73-303-610 requirement. There are no details included which provide for the monitoring [or characterization] for the decades of proposed storage. Permitted treatment facilities [e.g., Perma Fix] are available; there is no justifiable defense for noncompliance with WAC 173-303-610.

Furthermore, operational history at these sites does not substantiate DOE's claim to have demonstrated it has (or will) take steps to prevent threats to human health and the

environment including compliance requirements [WAC 173-303-110, -200, -310, -320, -330, -340, -360, and -380]. [23 1ZDR-ll container noted in Outside Storage Area A (Area A) closure plan as *an area of interest* & Ecology letter 12-NWP-039]. Removal is urgently needed before there is another leak, fire or explosion.

Ecology Response:

Thank you for your comment. Ecology agrees; we share the desire for prompt clean closure. We are working with the USDOE to determine the schedule for closure of these DWMUs. Hanford operations preceded the laws and regulations (CERCLA/RCRA) and they cannot come into compliance as quickly as the regulations require. The Tri-Party Agreement lays out a schedule for getting things into compliance. However, the CAFO requires more prompt schedules for certain DWMU(s) closure.

Comment 30v from Russell Jim, Yakama Nation, dated January 6, 2014

General – Closure Plans - 2. Clarification is also requested as to what basis Ecology has to authorize continued management of wastes in a dangerous waste management that has already failed or is so poorly managed so as to result in releases to soils and the environment or has violated WAC 173-303-400 [see CAFO-No. RCRA-10-2013-0113]. Another example is in the case of the floor of Room 152; it is sealed concrete that does not provide secondary containment. Dangerous waste containers meeting the criteria specified in WAC 173-303-630(7)(c) are stored on standard pallets to ensure elevation off of the concrete floor.

Dangerous waste packages not meeting the criteria specified in WAC 173-303-630(7)(c) (e.g., waste package containing free liquids) are placed on portable spill containment equipment such as spill pallets meeting the criteria specified in WAC 173 -303-630(7)(a) and (b). WAC 173-303-6307(c) bars free liquid storage in noncompliant facility storage.

Ecology Response:

Thank you for your comment. The EPA CAFO and the Ecology Agreed Order specify requirements for managing the waste at SWOC at this time. As part of both documents, permit applications will be submitted and these units will be brought into the Revision 8c under final status. The requirements of the Agreed Order will also be included in the next permit revision (Rev.9).

Comment 30w from Russell Jim, Yakama Nation, dated January 6, 2014

General – Closure Plans - 3. Erroneous statements that approval of Closure Plans will grant the Hanford Site an extended closure period in accordance with WAC 173-303-610(4)(c) without any modification requests being submitted to Ecology. Any subsequent changes to the approved closure plan or schedule require a permit modification in accordance with WAC 173-303-830/-840.

Ecology Response:

Thank you for your comment. Ecology agrees; extended closure must be justified and requested per the appropriate section in WAC 173-303-610(4)(a) or (b).

Comment 30x from Russell Jim, Yakama Nation, dated January 6, 2014

General – Closure Plans - 4. Closure plans must comply with the WAC 173-303-610 requirements; closure plans do not ' simply represent a baseline for closure ' as stated. WAC 173-303-610(3) (iv thru vi) requires more information and details which are not included in these Closure Plans.

• Lacking detailed descriptions of steps needed to remove or decontaminate all dangerous waste residues and contaminated containment system components, equipment, structures and soils, including methods for sampling and testing of surrounding soils and criteria for determining the extent of decontamination required to satisfy the closure performance standards.

• Lacking details of compliance with WAC 173-303-630 & WAC 173-303-695 requirements. [e.g., The current LLBG container storage pads are not in compliance with WAC 173-303-630 requirements [and a discrepant container does not meet LDR standards for placement on these pads]; Sections of 221-T Building have been designated as a Containment Buildings [221-T Railroad Tunnel, 221-T Canyon Deck, and selected 221-T Cells (7L, 13R, 17R).]

• Lacking details of compliance with WAC 173-303-640(6). [e.g., Given that wastes remain in some tanks (see Part A form text cited above), the tanks continue to actively manage wastes, and they must continue to follow applicable tank requirements at least until removal of waste has been completed, if not until certification of completion of closure has been submitted to Ecology. Tank inspections shall include inspection of overfill controls, aboveground indications of corrosion or release of wastes, data gathered from monitoring any leak detection equipment, the construction

materials and the area immediately surrounding the externally accessible port ion of the tank system, including the secondary containn1ent system to detect erosion or signs of releases of dangerous wastes. Tank inspection shall include inspection of cathodic protection systems, if present.]

• Lacking details of compliance with WAC 173-303-680(2). [e.g., Miscellaneous unit]

• Lacking details of how compliance with WAC 173-303-140(2) will be met prior to storage or disposal.

• Lacking details of compliance with the requirements of and 40 CFR 264. 1101 (c)(4) [incorporated by reference at WAC 173-303-695]. [e.g., Containment building].

• Lacking following text to ensure public involvement opportunities: any updates to SAP shall be through the permit modification process in accordance with WAC 173-303-830/840.

• Lacking following (or similar) text to ensure prevention of soil and groundwater contamination: clean closure of the soil under the CWC structures and modules will be accomplished by demonstrating that the coated concrete floors kept contamination from reaching the soil. The coated concrete floors provided secondary containment for the storage and treatment areas of CWC. Unless inspections identify potential through-thickness cracks indicating containment failure and a subsequent for potential soil contamination from the TSD unit operations, the soil will be considered clean closed. Should inspections identify such cracks, potential soil and groundwater contamination will be investigated as an unexpected event during closure. In this circumstance, a sampling and analysis plan for characterizing the nature and extent of soil contamination will be prepared following the completion of a data quality objectives process in accordance with EPA/600/R-96/055 (QA/G-4), *Data Quality Objectives Process*, as amended. The data quality objectives process will be initiated prior to closure on a schedule to ensure timely closure of CWC. The sampling and analysis plan will be submitted to Ecology as part of a permit modification request in accordance with WAC 173-303-830. This permit modification request will also establish constituents of concern, soil remediation requirements, soil closure performance standards, and associated sampling, analysis, and *QN QC* requirements necessary to demonstrate compliance with closure performance standards. The sampling and analysis plan will be prepared consistent with EPN 240-B-O l/003 (EPN QA R-5), *EPA Requirements for Quality Assurance Project Plans*, as amended.

• Lacking consistency in requirements for IQRPE actions.

• Lacking consistency in requirements for decontamination per WAC 173-303.

• Lacking consistency in requirements for removal of and disposal of contaminated media [including rinsate].

• Lacking consistency in designation of dangerous and/or mixed waste provisions of WAC 173-303.

• Lacking consistency between closure plan tables and Part A tables and/or area dimensions/volumes.

• Lacking (in some instances) evaluations of compliance with (WAC 173-303- 630(4), - (7), Subpart CC control standards (40 CFR 264.1084 - 264.1 086), and Ecology Publication ##09-05-007 [Guidance for Preparing Waste Sampling and Analysis Documents and *QN QC* Requirements at Nuclear Waste Sites.]

• Lacking (in some instances) the estimated maximum waste inventory; WAC 173-303-610(9) & (10) discussions; and Post-Closure Care -610(7) & (8) discussions.

• Lacking section on Container Receipt and Inspection and non-acceptable waste shipment within the Inspection or Closure Plans.

• Including statements regarding clean closure determinations by DOE which are under Ecology's authority [e.g., allowing concrete floorings to remain in place]; Some closure units will remain in "as is" state citing nearby operating DWMU when in reality, information presented in figures do not support claims to not need to comply with clean closure standards of WAC 173-303-610(2). Closuring units which are easily and safely accessible should not delay or defer required closure actions subject to TPA Milestones.

• Including statements not in compliance with WAC 173-303-830 requirements (e.g., " Subsequent changes to the closure schedule will not require a permit modification and a separate extension request will not be filed".)

• Inconsistent format between similar documents.

Ecology Response:

Thank you for your comment. Ecology agrees; we have found several areas in the closure plans where more information is required. In our review, we found many of the same issues stated here. We are working with the USDOE to resolve these issues before the closure plans go out for public comment again.

Comment 30y from Russell Jim, Yakama Nation, dated January 6, 2014

General – Closure Plans - 5. Clarification is needed to differentiate between closure performance standards for soils, groundwater, surface water, and air, subject to -610(2)(b)(i) and which are not being established in this closure plan, and -610(2)(b)(ii), which are established by Ecology. Closure Performance standards for structures are to be set by Ecology on a case-by-case basis.

Ecology Response:

Thank you for your comment. Ecology agrees and closure standards for each closing DWMU will be determined and listed in the closure plan.

Comment 30z from Russell Jim, Yakama Nation, dated January 6, 2014

General – SAPs - Sampling and analysis for exceedance of MTCA Method B standards do not require following the *observational approach* and unfiltered sampling for SAPs.

Additional soil removal and re-sampling until these standards are not exceeded is not required and should be. The following are requested to be included in all SAPs:

• Employment of a 'methods-based approach' to all sampling, provide all suite analysis results, and evaluate data to ensure verification sampling demonstrates no exceedances of unrestricted numerical cleanup levels should also be a requirement of the clean closure determination process. Use of the 'judgmental sampling' approach should be limited and in no way substitute for the required a statistical approach. Discrete samples should target the most likely to be highest site of contamination.

• Verification soil sampling performed during closure activities must demonstrate that any residual dangerous wastes, dangerous waste constituents, and/or residues do not exceed the unrestricted numerical clean ups levels in accordance with the Model Toxics Control Act (MTCA) regulations calculated according to MTCA Method B (2007, as amended).

• The Sampling and Analysis Plans to have consistency with Ecology Publication #09-05-007 Guidance for Preparing Waste Sampling and Analysis Documents and QA/QC Requirements at Nuclear Waste Sites.

• Methods are not discussed. Steps are conceptual rather than defined as required.

Associated issue: The Sampling and Analysis Plans (and Waste Analysis Plans) and criteria for waste acceptance at the LLBG should be informed by the results of the Risk Budget Tool.

Ecology Response:

Thank you for your comment. Ecology agrees; many of the closure plan Sampling and Analysis Plans (SAPs) were incomplete. We are working with the USDOE to resolve this issue before the next public comment period. Closure SAP criteria are determined per the requirements in WAC 173-303-610 and referenced MTCA (WAC 173-340) criteria.

Comment 30aa from Russell Jim, Yakama Nation, dated January 6, 2014

General – Schedule - Some closure units will remain in "as is" state citing nearby operating DWMU when in reality, information presented in figures do not support claims to not need to comply with clean closure standards of WAC 173-303-610(2). Closuring units which are easily and safely accessible should not delay or defer required closure actions subject to TPA Milestones.

Ecology Response:

Thank you for your comment. Ecology agrees; we share the desire for prompt clean closure. We are working with the USDOE to determine the schedule for closure of these DWMUs now. If extensions in the closure schedule need to be granted, they will be done per the requirements in WAC 173-303-610(4)(a) and (b).

Comment 30bb from Russell Jim, Yakama Nation, dated January 6, 2014

General - Related Issue: Factsheet and public hearings: The Fact sheet provided to the public did not fully disclose DOE violations and the content of the EPA Consent Agreement and Final Order (CAFO-No. RCRA-10-2013-0113). This does not comply with the requirements of WAC 173-303-830(4)(c)(iii) to have supporting documents available, etc. The YN ERWM program requests a new public involvement comment period including public hearings around the region with full discussions of the following:

• EPA Consent Agreement and Final Order (CAFO-No RCRA-10-2013-0113).

• Closure schedule for removal and treatment of illegally stored wastes and how it complies with WAC 173-303-610(4) and the CERCLA offsite waste rule and relevant standards

• DOE's SEPA checklist submittal for this permitting action.

• Unit operations under interim status standards and Ecology's obligations under WAC 173-303-400(3)(i) and 173-303-805(8)(d)

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

The SEPA checklist will be included in Ecology's public comment review.

Comment 31a from Dorothy Lamb, Citizen, dated January 6, 2014

General – 1. We need public hearings every year in many cities to give you a chance to hear the people and to educate the public. Written comments are not enough. We need to be able to ask you questions and to hear your replies to all the questions.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 31b from Dorothy Lamb, Citizen, dated January 6, 2014

General – 2. When you do give **notice** of the next round of review, comment, and hearings please fully disclose that the permit changes were ordered by EPA because USDOE is illegally storing & disposing of the wastes. And it should disclose that wastes have leaked, and disclose that wastes have leaked and explain prolonged storage risks.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 31c from Dorothy Lamb, Citizen, dated January 6, 2014

General – 3. The CWC hazardous waste permit should require USDOE to remove and treat all illegally stored wastes within 3 years. And also have a schedule for removing and treating the 68,000 drums of wastes stored illegally inside within 3 years. And also have a schedule to remove and treat all the waste stored outside.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" or basis for the cited number of "68,000 drums." The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 31d from Dorothy Lamb, Citizen, dated January 6, 2014

General – 4. The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 or 34 or any storage or disposal facility) 1) while existing wastes are illegally stored anywhere at Hanford, and 2) if leakage from disposal trenches is projected to contaminate groundwater.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 32a from Candace Rose, Citizen, dated January 6, 2014

CWC-WRAP - I am very concerned about the vast accumulation of hazardous waste from Hanford, and am even more concerned that additional waste is being transported to the CWC. I would like to urge a scheduled removal plan by USDOE for all the hazardous wastes.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 32b from Candace Rose, Citizen, dated January 6, 2014

General - I would also like to have public hearings regarding this serious problem in our area. I am in Walla Walla, and know that there are many of us who would like to have a hearing that we can attend.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 32c from Candace Rose, Citizen, dated January 6, 2014

General - I understand that some quantities of these hazardous wastes are leaking into the environment. This must be stopped, mitigated and prevented. It seems that our state laws are more stringent than the USDOE-- they should be brought to task in terms of legality and safety.

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the

meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 33a from Erendira Cruz, Citizen, dated January 6, 2014

CWC-WRAP - As a concerned citizen residing in the area of impact of the Hanford Hazardous Waste Complex, I would like to offer the following comments:

First, in accordance with state hazardous waste laws, the Hanford Hazardous Waste Permit for the CWC must require that USDOE remove and treat all illegally stored wastes within three years.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" for the removal of wastes. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 33b from Erendira Cruz, Citizen, dated January 6, 2014

General - Secondly, citizens should be invited to public hearings across the region on the proposed changes. The next round of review, comment and hearings should include disclosure, including that permit changes were ordered by the EPA due to USDOE illegally storing and disposing of wastes at the site, and including that wastes have leaked, as well as explaining the risks associated with prolonged storage.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 33c from Erendira Cruz, Citizen, dated January 6, 2014

General – LLBG Trenches 31 & 34 - Finally, the Hanford RCRA permit should specifically bar USDOE from adding any additional wastes from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; and, if leakage from any disposal tranches is projected to contaminate groundwater.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 34a from Vaughn Zeitwolfe, Citizen, dated January 5, 2014

CWC-WRAP - The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat ALL illegally stored wastes within 3 years. The

Department of Ecology should include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" or basis for the cited number of "68,000 drums." The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 34b from Vaughn Zeitwolfe, Citizen, dated January 5, 2014

General - We need to have public hearings across the region on the proposed changes, including a hearing in Portland, Oregon.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 34c from Vaughn Zeitwolfe, Citizen, dated January 5, 2014

General - The public notice for the next round of review, comment and hearings must fully disclose that these permit changes were ordered by EPA due to USDOE illegally storing and disposing of wastes. The notice should disclose that wastes have leaked and explain the risks of prolonged storage.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 34d from Vaughn Zeitwolfe, Citizen, dated January 5, 2014

General – LLBG Trenches 31 & 34 - The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; and, if leakage from disposal trenches is projected to contaminate groundwater.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 34e from Vaughn Zeitwolfe, Citizen, dated January 5, 2014

General - The USDOE needs to reassess the environmental impact of dumping radioactive toxic waste in such close proximity to a river, groundwater, and on permeable soil; granite bedrock in a desert environment is the only location this sort of waste can to be deposited to be environmentally viable.

Ecology Response:

Thank you for your comment. Ecology acknowledges the inherent risks from continued storage. That is why the SWOC units are being brought into the Revision 8c permit under the CAFO and Agreed Order requirements.

Comment 35a from Elena Naskova, Citizen, dated January 5, 2014

General – Illegally stored waste - Dear Sir or Madam, Please follow the law and do the right thing with the illegally stored Hanford waste. Please set firm, enforceable schedules to remove the thousands of illegally stored drums of radioactive chemical before there is an explosion or more leaks. Hazardous waste law requires removal within months, but they have sat for years. Your "closure" plan is dangerous, hazardous, and against the law, without taking peoples' and environment's safety into consideration. Sweeping nuclear waste under the carpet is a bad idea.

Ecology Response:

Thank you for your comment. Ecology agrees; we share the desire for prompt clean closure. We are working with the USDOE to determine the schedule for closure of these DWMUs. Hanford operations preceded the laws and regulations (CERCLA/RCRA) and they cannot come into compliance as quickly as the regulations require. The Tri-Party Agreement lays out a schedule for getting things into compliance. However, the CAFO requires more prompt schedules for certain DWMU(s) closure.

Comment 35b from Elena Naskova, Citizen, dated January 5, 2014

General - Please involve the people whose life is affected by this and set up a public hearing across the region on the proposed changes. We take a pride in the North West, we love and cherish our environment, and we try hard to preserve this and leave our children what we got. Don't try to ignore us. Don't ruin it for us and our future generations.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 36a from Jesse Phillips, Citizen, dated January 4, 2014

CWC-WRAP - The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat ALL illegally stored wastes within 3 years. Ecology should include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" or basis for the cited number of "68,000 drums." The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 36b from Jesse Phillips, Citizen, dated January 4, 2014

General - I demand that public hearings be held across the region on the proposed changes, including a hearing where you live.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 36c from Jesse Phillips, Citizen, dated January 4, 2014

General - The public notice for the next round of review, comment and hearings must fully disclose that these permit changes were ordered by EPA due to USDOE illegally storing and disposing of wastes. The notice should disclose that wastes have leaked and explain the risks of prolonged storage.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 36d from Jesse Phillips, Citizen, dated January 4, 2014

General – LLBG Trenches 31 & 34 - The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; and, if leakage from disposal trenches is projected to contaminate groundwater.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 37a from Carol Hiltner, Citizen, dated January 4, 2014

General - Enough of USDOE's reckless poisoning of our lands and disregard of law! State hazardous waste law rules require that "closure" plans have specific enforceable schedules on which progress can be evaluated (WAC 173-303-610). USDOE's proposal fails to meet this

standard. Instead, USDOE's proposed 'closure" plan merely says that eventually the wastes will be removed in keeping with a general deadline of the year 2030 in the Tri-Party Agreement.

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 37b from Carol Hiltner, Citizen, dated January 4, 2014

The rules also require that wastes be removed for treatment in under a year. For these illegally stored wastes, commercial treatment of the hazardous wastes with which they are mixed, is available at the Perma-Fix NW treatment facility adjoining Hanford. USDOE has failed to ask Congress to fund removal and treatment. If included in the permit, USDOE will be required to ask Congress for the funding to meet the closure plan schedule.

Ecology Response:

Thank you for your comment. Ecology agrees. However, it is up to USDOE to request the proper funding from Congress to perform the work. This comment is out of the scope for this SWOC closure plan modification.

Comment 37c from Carol Hiltner, Citizen, dated January 4, 2014

General - 1. Require USDOE to remove and treat ALL illegally stored wastes within 3 years. Include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" or basis for the cited number of "68,000 drums." The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 37d from Carol Hiltner, Citizen, dated January 4, 2014

General - 2. Hold public hearings across the region on the proposed changes, including a hearing in Seattle.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 37e from Carol Hiltner, Citizen, dated January 4, 2014

General - 3. Fully disclose that these permit changes were ordered by EPA due to USDOE ILLEGALLY storing and disposing of wastes in the public notice for the next round of review, comment and hearings. Disclose that wastes have leaked and explain the risks of prolonged storage.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 37f from Carol Hiltner, Citizen, dated January 4, 2014

General – Trenches 31 & 34 - 4. Specifically bar USDOE from adding any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; or if leakage from disposal trenches is projected to contaminate groundwater.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 38a from Beth Call, Citizen, dated January 3, 2014

General - You must require the USDOE to follow the law and have an enforceable schedule to remove and treat wastes from Hanford.

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 38b from Beth Call, Citizen, dated January 3, 2014

General - Instead the USDOE wants to import MORE waste to Hanford when they have already illegally and immorally transported and stored 68,000 drums of waste inside, and large waste containers containing radioactive and chemically lethal, wet, waste outside in leaking tanks, or in vast unlined trenches. (Officials from the DOE have dared to deny the leaks, claiming the leaked liquid is just rainwater though it has been tested and found to contain plutonium and lethal chemicals.) The possibility of a nuclear explosion like at Fukushima is a distinct possibility. But if we are lucky and escape an explosion, the leaking waste inevitably would enter the groundwater which seeps into the Columbia. The Columbia would no longer be able to support healthy fish nor would the water of the Columbia be safe for drinking, irrigation, recreation, or transportation. The

Columbia Basin ultimately and for thousands of years would become unlivable for human beings. The radioactive and poisonous waste would continue on to contaminate the Pacific Ocean.

The Washington Department of Ecology has a moral and legal obligation to forbid the importation of any more nuclear & hazardous waste and to establish a schedule for the Department of Energy to treat and remove the hazardous waste already at Hanford. When Christine Gregoire was Attorney General she was able to get the Department of Energy to sign the Tri-Party Agreement for cleanup of Hanford. Unfortunately the DOE has fallen far behind in that schedule, but it should still be held accountable to clean up the Hanford waste as soon as is humanly possible, with specific dates set.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for the cited number of "68,000 drums." The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 38c from Beth Call, Citizen, dated January 3, 2014

General - Please do not sell out the people of Washington state. Show the same courage and bargaining toughness that Christine Gregoire did.

HOLD PUBLIC HEARINGS. The public has the right to know what the DOE is planning and to provide their input.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 39a from Nancy Ball, Citizen, dated January 3, 2014

General - For decades we have been told that a deadline was set for the cleanup of radioactive wastes at Hanford, only to have the deadline broken, then set again, and broken, set again... Still the wastes have not been cleaned up, and some have been leaking. We must have a deadline set and enforced to provide closure for this decades-long problem of dangerous wastes at Hanford. These wastes are a threat to both our health and our environment--human and all other living things.

Ecology Response:

Thank you for your comment. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 39b from Nancy Ball, Citizen, dated January 3, 2014

General - Furthermore, to allow the addition of more radioactive wastes at Hanford when we can't/don't clean up the wastes we already have is morally wrong and irresponsible. This must not happen.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 40a from Richard Hernandez, Citizen, dated January 3, 2014

CWC-WRAP - 1. The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat ALL illegally stored wastes within 3 years. I believe the Washington State Dept. of Ecology should include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" or basis for the cited number of "68,000 drums." The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9)

Comment 40b from Richard Hernandez, Citizen, dated January 3, 2014

General - 2. Public hearings need to be held across the region on the proposed changes, including a hearings here in Kirkland/Eastside

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 40c from Richard Hernandez, Citizen, dated January 3, 2014

General - 3. The public notice for the next round of review, comment, and hearings must fully disclose that these permit changes were ordered by EPA due to USDOE illegally storing and disposing of wastes. The notice should also disclose that wastes have leaked and explain the risks of prolonged storage.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 40d from Richard Hernandez, Citizen, dated January 3, 2014

General – LLBG Trenches 31 & 34 - 4. The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; and, if leakage from disposal trenches is projected to contaminate groundwater.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 41a from Robin Bloomgarden, Citizen, dated January 4, 2014

General - The proposed permit should REQUIRE USDOE to remove and treat ALL illegally stored wastes, within 3 years. This process has dragged on for far too long.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" for removing wastes. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 41b from Robin Bloomgarden, Citizen, dated January 4, 2014

CWC-WRAP - It should include a schedule for removal and treatment of the 68,000 drums of wastes stored inside CWC within the same time period, as well as a schedule to do the same with all the wastes stored outside of it!

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for the cited number of "68,000 drums." The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 41c from Robin Bloomgarden, Citizen, dated January 4, 2014

General - Ecology should make sure to have well publicized public hearings about the proposed changes in the permit, in all the affected cities in the region, including here in Eugene, where I live.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 41d from Robin Bloomgarden, Citizen, dated January 4, 2014

General - The public hearing notices should note that wastes have leaked, and should explain what the risks of prolonged storage of these wastes will mean to the public.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 42a from Gerry Pollet, Heart of America Northwest, dated January 6, 2014

CWC-WRAP - 1. The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat ALL illegally stored wastes within 3 years.

Ecology should include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

State hazardous waste law rules require that "closure" plans have specific enforceable schedules on which progress can be evaluated (WAC 173-303-610). USDOE's proposal fails to meet this standard. Instead, USDOE's proposed 'closure" plan merely says that eventually the wastes will be removed in keeping with a general deadline of the year 2030 in the Tri-Party Agreement. The rules also require that wastes be removed for treatment in under a year.

For these illegally stored wastes, commercial treatment of the hazardous wastes with which they are mixed, is available at the Perma-Fix NW treatment facility adjoining Hanford. USDOE has failed to ask Congress to fund removal and treatment. If included in the permit, USDOE will be required to ask Congress for the funding to meet the closure plan schedule.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" or basis for the cited number of "68,000 drums." The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 42b from Gerry Pollet, Heart of America Northwest, dated January 6, 2014

General - 2. Ecology must hold public hearings across the region on the proposed changes, including honoring the requests of 190 people who responded to our public involvement survey that they want a hearing near them, based on learning of the violations and ongoing illegal storage of wastes which triggered this set of proposed permit modifications.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 42c from Gerry Pollet, Heart of America Northwest, dated January 6, 2014

General - 3. The public notice for the next round of review, comment, and hearings must fully disclose that these permit changes were ordered by EPA due to USDOE illegally storing and disposing of wastes.

The notice should disclose that wastes have leaked and explain the risks of prolonged storage, which must be accompanied by an EIS pursuant to SEPA.

Ecology should set up easily publicly accessible websites with the compliance /violation and release history of all units, starting with these units when notice is sent out for commenting on permit modifications relating to the units.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Ecology will perform a SEPA evaluation; this accompanies the proposed draft permit. The SEPA checklist is not in the Permittee's part of the Class 3 Modification, it is in the Ecology part and will be included in the next public comment period

Comment 42d from Gerry Pollet, Heart of America Northwest, dated January 6, 2014

General – Trenches 31 & 34 - 4. The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford, e.g. CWC; and, if leakage from disposal trenches is projected to contaminate groundwater. Ecology and EPA should each issue specific orders barring all offsite waste from units at Hanford, consistent with the CERCLA offsite waste rule and its standards.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 43a from Craig Edwards, Citizen, dated January 3, 2014

General - Hello, My name is Craig Edwards. I live in Carlton, WA. I am very concerned about Hanford, its pollution and the clean up.

Ecology Response:

Thank you for your comment. Ecology is also concerned about the cleanup activities at Hanford.

Comment 43b from Craig Edwards, Citizen, dated January 3, 2014

CWC/WRAP/LLBG – Recently the USDOE has applied for a permit to put off any removal or treatment of thousands of drums and containers of illegally stored waste.

I urge the WSDOE [WA State Dept of Ecology], your agency, to not approve any permit that gives the USDOE no enforceable schedule or no deadlines to remove and treat the waste.

Ecology Response:

Thank you for your comment. Ecology agrees; we share the desire for prompt clean closure. We are working with the USDOE to determine the schedule for closure of these DWMUs. Hanford operations preceded the laws and regulations (CERCLA/RCRA), and they cannot come into compliance as quickly as the regulations require. The Tri-Party Agreement lays out a schedule for getting things into compliance. However, the CAFO requires more prompt schedules for certain DWMU(s) closure.

Comment 43c from Craig Edwards, Citizen, dated January 3, 2014

LLBG - I also urge the WSDOE to stand strong and require that the USDOE do the right thing, follow the law, respect the Washington State voters and their decision. The USDOE must follow an enforceable schedule to remove and treat all the waste they created at Hanford and not be allowed to bring in more for storage.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 43d from Craig Edwards, Citizen, dated January 3, 2014

General – WSDOE needs to schedule public meetings on the subject in Seattle, Portland, Spokane, and why not Yakima or Wenatchee?

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 44a from Kathleen Yockey, Citizen, dated January 2, 2014

General – I am writing in concern to the USDOE issued "record of decision" on Dec.13, 2013, regarding clean-up, tank closure, and waste management TCWM-EIS at the Hanford Nuclear reservation in Eastern Washington state.

Despite thousands of comments and large public participation at all of the hearings of the past years regarding clean up and future storage at the Hanford site, the DOE's has shown disregard for U.S. and Wa. State citizens. The Dept. of Energy and Ecology both US. and state levels have a responsibility to protect the people, land, air and waters of Washington state and the entire country.

Ecology Response:

Thank you for your comment. This comment is out of scope for this SWOC closure plan modification.

Comment 44b from Kathleen Yockey, Citizen, dated January 2, 2014

CWC/LLBG - I am solidly opposed to importing more radioactive waste to Hanford. Hanford is already a leaking mess and its proximity to the Columbia River is a poor choice for a National deposit site.

The DOE plans to put off clean up is an atrocity. The Hanford clean up has been a debacle. The contractors are incompetent and there is a mistrust of information put forth by the DOE.

Before any conversation of bringing future waste to Hanford the current problems need to be addressed now – not put off years down the road.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 44c from Kathleen Yockey, Citizen, dated January 2, 2014

General – This is a public health issue and further comment and public meetings thru out the state must be held to accurotty [*sic*] inform the public and to seek input from Washington state citizens. The health and well being of generations are in your hands. Put the citizens, land, air and water ahead of corruption and selfish gains.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 45 from Lisa McKhann, Citizen, dated January 3, 2014

General - I write to share my opinion that public meetings should be held to discuss disposal of hazardous waste from the Hanford Nuclear reservation. Having once lived in eastern Washington (as well as both coasts), I understand the importance of water quality – both groundwater and rivers like the Columbia. Citizens need to have time and space to discuss, learn, listen and weigh in on these gargantuan, long-term environmental questions. Any agency charged with environmental regulation and protection must adequately inform and involve citizens. This is not just a local issue. As we know from other nuclear incidents, damage has global effects.

Ecology Response:

Thank you for your comment. Ecology Public Involvement is working on the hearing issue.

Comment 46 from Marion Moos, Citizen, dated January 2, 2014

General – I am opposed.

[to the Hanford Site Permit Modifications]

Ecology Response:

Thank you for your comment.

Comment 47 from Marti Buck, Citizen, dated January 2, 2014

General - I have just received notice that there are plans, all to be delayed, to continue adding to the nuclear waste currently stored at Hanford, WA facilities. Please stop this plan and work in support of continued clean up at this site not added waste. I understand that these wastes go somewhere and the larger problem is continuing to produce them without good solutions to the waste issue. However, this location is far too close to the Columbia river and the threat of nuclear material intrusion into the water ways is far too great.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 48a from Sharon Fasnacht, Citizen, dated January 2, 2014

General – I'll make this brief. Hanford is already a disaster site, and USDOE has known it for years. I am convinced that is why USDOE hasn't kept its contracts with WA and ORE since the 1970's. Their last report is a joke! Just ask ethical scientists in WA and Oregon, and the nuclear waste industry.

You human beings who make the decisions for USDOE are already responsible for nuclear waste leaking into our magnificent Columbia River, and unavoidably into our Pacific Ocean! Are you insane? (Dumb question.)

The pity is: For the illegally stored wastes at the Hanford site, and commercial treatment of the hazardous wastes with which they are mixed, Treatment is available! At Perma-Fix NW treatment facility adjoining Hanford. That doesn't take care of the entire problem, but it's a start and it is available! We don't have to wait for new science to start tackling part of the problem now!

But……..USDOE has failed to ask Congress to fund removal and treatment. If included, in the permit, USDOE will be required to ask Congress for the funding to meet the closure plan schedule.

What do I recommend?

Ecology Response:

Thank you for your comment. Ecology agrees. However, it is up to USDOE to request the proper funding from Congress to perform the work. This comment is out of the scope for this SWOC closure plan modification.

Comment 48b from Sharon Fasnacht, Citizen, dated January 2, 2014

General – 1. Immediate compliance by USDOE. Clean up Hanford, to the extent possible, as you have repeatedly promised and have repeatedly failed to even begin to do. Primarily, do whatever

is humanly possible to keep waste from contaminating the Columbia river and the Pacific Ocean. (If Congress refuses to fund the effort, make all those opposed to funding move to Hanford permanently.

Ecology Response:

Thank you for your comment. Ecology agrees; we share the desire for prompt clean closure. We are working with the USDOE to determine the schedule for closure of these DWMUs. Hanford operations preceded the laws and regulations (CERCLA/RCRA) and they cannot come into compliance as quickly as the regulations require. The Tri-Party Agreement lays out a schedule for getting things into compliance. However, the CAFO requires more prompt schedules for certain DWMU(s) closure.

Comment 48c from Sharon Fasnacht, Citizen, dated January 2, 2014

General – 2. Immediate freeze on all construction (and new licensing) of Nuclear Power Plants until "Science" comes up with a safe, permanent disposal – not storage method. That's disposal guys!

Ecology Response:

Thank you for your comment. This comment is out of the scope for this SWOC closure plan modification.

Comment 48d from Sharon Fasnacht, Citizen, dated January 2, 2014

General – 3. Funding for research to develop a safe, permanent disposal method. (All of us know glassification is not a disposal method but only a storage option.)

Ecology Response:

Thank you for your comment. This comment is out of the scope for this SWOC closure plan modification.

Comment 48e from Sharon Fasnacht, Citizen, dated January 2, 2014

General – 4. Since the military has been a primary producer of nuclear waste, involve the Pentagon in solving the disposal problem.

Ecology Response:

Thank you for your comment. This comment is out of the scope for this SWOC closure plan modification.

Comment 48f from Sharon Fasnacht, Citizen, dated January 2, 2014

General – 5. If USDOE even proposes storage of additional nuclear waste at the Hanford site, I recommend that WA and Oregon sue the United States Congress and USDOE for dereliction of

duty, breach of contract, and stupidity! ……but that's just me….A concerned citizen and former resident of the Tri-Cities, current lover of the Columbia and Pacific coast, and I like life a lot too. Ain't [*sic*] much of that if you are poisoned by nuclear waste.

Ecology Response:

Thank you for your comment. This comment is out of the scope for this SWOC closure plan modification.

Comment 49a from Theresa DiPasquale, Citizen, dated January 3, 2014

General - To the Washington State Department of Ecology: As a resident of Walla Walla and an environmentally-aware US citizen, I am deeply concerned about the USDOE's plans for Hanford. How can the state even consider allowing that plan to go forward? The health consequences to Washington and Oregon residents will be felt for generations to come! Anyone who cares about the future of our region must insist upon a number of key measures:

Ecology Response:

Thank you for your comment. Ecology acknowledges the inherent risks from continued storage. That is why the SWOC units are being brought into the Revision 8c permit under the CAFO and Agreed Order requirements.

Comment 49b from Theresa DiPasquale, Citizen, dated January 3, 2014

CWC-WRAP - 1. The Hanford hazardous waste permit for the CWC must require USDOE to remove and treat all illegally stored waste within three years, including all waste currently stored inside the CWC and all the waste stored outside. The three-year schedule should be clearly mapped out now by the state Department of Ecology.

Ecology Response:

Thank you for your comment. Ecology is not aware of the basis for "three year requirement" for removal of wastes. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Comment 49c from Theresa DiPasquale, Citizen, dated January 3, 2014

General - 2. Any proposed changes in the current rules for waste cleanup at Hanford should be discussed in well-advertised public hearings in all affected communities, including the Tri-Cities, Walla Walla, and Spokane. The announcements publicizing these hearings must explain to the citizens that the EPA has ordered permit changes because the USDOE was illegally storing and disposing of waste, that this waste has been leaking, and that the long term storage of this waste poses serious risks to the environment and population of the entire region.

Ecology Response:

Thank you for your comment. Ecology is issuing a revised fact sheet on the Solid Waste Operations Complex facilities for the next round of comments. This fact sheet explains why the USDOE was required to submit closure plans for the unpermitted SWOC units.

Comment 49d from Theresa DiPasquale, Citizen, dated January 3, 2014

CWC-WRAP/LLBG Trenches 31 & 34 - 3. The Hanford RCRA permit must specifically bar the USDOE from adding ANY MORE hazardous waste from off site to trenches 31 and 34 or any other disposal facility at Hanford as long as existing waste at Hanford is illegally stored anywhere on site, and as long as leakage from the site is projected to contaminate ground water.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 50a from Tim Shinabarger, Citizen, dated January 2, 2014

General - As a resident of the Pacific Northwest whose daughter and son-in-law work as emergency responders, I am concerned about the proposal to amend the Hanford hazardous waste permit to allow the U.S. Department of Energy to ship more radioactive waste to Hanford. Our home city of Eugene, Oregon is on interstate 5 and thus on one of the routes by which hazardous radioactive waste would be shipped to Hanford. In the event of a shipping accident in this region, as first responders my family members would face the risk of radioactive contamination to carry out their community function to protect the resident population.

Ecology Response:

Thank you for your comment. Ecology agrees with banning most offsite waste, but some offsite waste is acceptable. That offsite waste is covered in the "Settlement Agreement with the State of Washington (as amended on June 5, 2008) in the case of State of Washington v. Bodman (Civil No. 2:03-cv-05018-AAM)."

Comment 50b from Tim Shinabarger, Citizen, dated January 2, 2014

Rather than ship more radioactive waste top the Hanford complex, the Department of Energy needs to remove and treat the wastes illegally stored there now. We know they are leaking and pose health risks to the local community. The DOE needs to establish a schedule to do so in accordance with state and federal hazardous waste regulations. The DOE proposed closure plan is not specific; the agency should remove and treat wastes within three years of plan approval.

Your agency is responsible not only to the residents of the State of Washington but also the entire Pacific Northwest population. Considering the health risks additional radioactive waste shipping would pose to the region, the one public meeting held regarding this issue is inadequate. I call on

you to order additional public hearings in the region's major cities of Portland, Spokane and Seattle, and if possible, in Eugene.

Ecology Response:

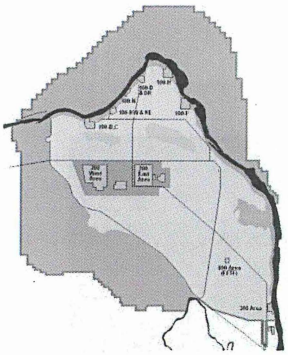
Thank you for your comment. Ecology is not aware of the basis for "three year requirement" for removal of wastes. The Tri-Party Agreement lays out a schedule for getting things into compliance. The Agreed Order specifies requirements for managing the waste at SWOC in the meantime. The requirements of the Agreed Order will be included in the next permit revision (Rev.9).

Ecology Public Involvement is working on the hearing issue.

APPENDIX A: COPIES OF ALL PUBLIC NOTICES

Public notices for this comment period:

1. Public notice (focus sheet)
2. Classified advertisement in the *Tri-City Herald*
3. Notice sent to the Hanford-Info email list



Fact Sheet

Public Comment Period on Proposed Updates to Permit for Hanford Dangerous Waste Management Units

The U.S. Department of Energy Richland Operations Office (DOE-RL) is holding a 60-day comment period on proposed Class 3 modifications to the Hanford Facility Dangerous Waste Permit. These changes are for the Low-Level Burial Grounds Trenches 31, 34 and 94, the Central Waste Complex and Waste Receiving and Processing Facility (CWC-WRAP), and the T-Plant Complex (T-Plant).

October 2013 U.S. Department of Energy

Background

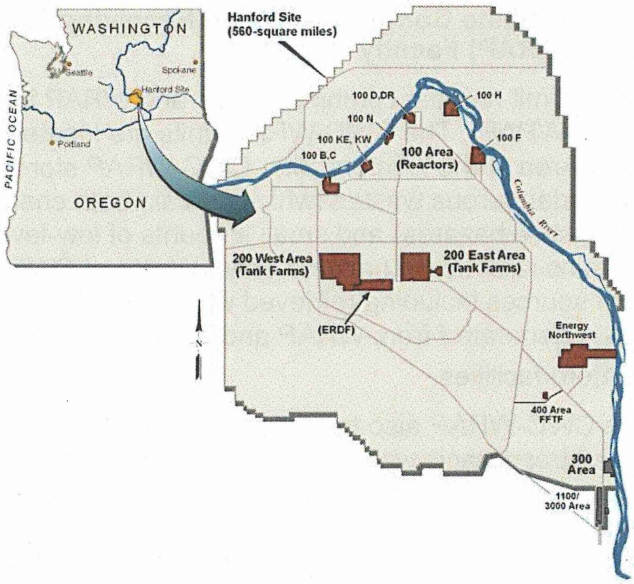
The proposed changes are to close some parts of the following units in Hanford's Dangerous Waste Permit:

- Low-Level Burial Grounds Trenches 31, 34, and 94
- Central Waste Complex – Waste Receiving and Processing (CWC-WRAP) Facility
- T-Plant Complex

Parts of these storage areas will not receive future waste shipments. The proposed modifications include submittal of:

- Closure plans for the specific storage areas at these units
- Updated Part A permit applications
- Inspection and training plans for the storage areas during closure

This is the first of two public comment opportunities for this proposed permit change. You can comment on the permit request during this comment period. When the Washington State Department of Ecology issues a draft permit, you can comment on the proposed permit.



Class 3 Modifications:

Class 3 modifications address changes that substantially alter a facility or its operations. Class 3 modifications require two public participation opportunities:

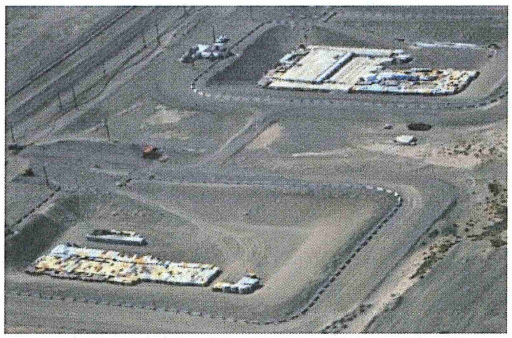
- Public comment on the permit modification request
- Public comment period on the permitting decision

Public Comment

DOE-RL and the Washington State Department of Ecology want your feedback on these proposed modifications. The public comment period will run from October 30, 2013 through January 6, 2014. A public meeting will be held on December 9, 2013, 5:30 to 6:30, at the Richland Public Library, 955 Northgate Dr. Richland, WA 99352

Low-Level Burial Ground Trenches 31, 34, and 94

Located in Hanford's 200 Area, the Low-Level Burial Ground Trenches 31 and 34 are used to store and dispose of dangerous waste or mixed waste from Hanford work. Trenches 31 and 34 are lined to collect any rain or snow that seeps through the disposed waste and the liquid is removed for treatment. Trench 94 is an unlined disposal trench for defueled nuclear reactor compartments from the U.S. Navy's submarines and ships. No new activity is planned or proposed for Trench 94 as part of this modification. These proposed changes do not affect the other burial grounds in Hanford's permit; those units will remain as part of the permit under a separate Part A permit application.



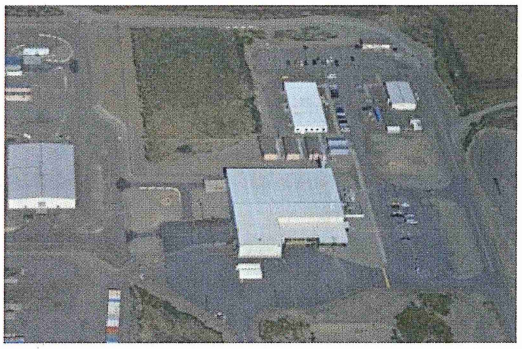
Trenches 31 and 34

Central Waste Complex – Waste Receiving and Processing (CWC-WRAP) Facility

This permit request combines CWC and WRAP into one unit (CWC-WRAP). The CWC-WRAP units are located in the 200 West Area of the Hanford Site. CWC-WRAP stores many types of mixed dangerous wastes (which contain both chemical and radioactive hazards) and small amounts of low-level waste (which contains radioactive hazards only). Waste at CWC-WRAP comes from sources including retrieved waste from burial grounds and waste generated from WRAP and T Plant as well as other Hanford facilities.

The CWC-WRAP also treats waste, mostly transuranic waste and mixed transuranic waste, and handles dangerous waste and low-level waste. Treatment includes a variety of methods, such as neutralizing liquids, compacting solids, and repackaging waste into compliant shipment containers. CWC-WRAP receives waste for treatment from sources including retrieved waste from burial grounds, newly generated waste from Hanford, and waste generated at CWC-WRAP.

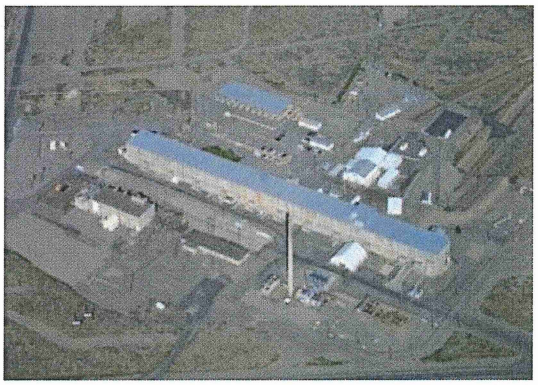
Central Waste Complex



Waste Receiving and Processing Facility

T-Plant Complex

Built in 1943, T-Plant stores and treats radioactive and mixed waste. T-Plant stores and treats waste that comes from burial grounds and other facilities at Hanford. Other T-Plant missions include sampling waste containers, venting containers to release gas, and a variety of treatment and repackaging of waste into shipment containers.



T Plant

The DOE-RL contact person for this permit change is Kim Ballinger, (509) 376-6332. The Washington State Department of Ecology contact person is Steve Lowe, (509) 372-7950.

The permittees' compliance history during the life of the permit being modified is available from the Washington State Department of Ecology contact person.

Copies of the proposed permit modification and supporting documentation are available at the Administrative Record, 2440 Stevens Drive, Richland, WA.

How you can become involved

Comment period – October 30-January 6.
Public meeting – December 9, 5:30-6:30 pm, Richland Library (955 Northgate Drive, Richland)
Please submit comments by *January 6, 2014* to:

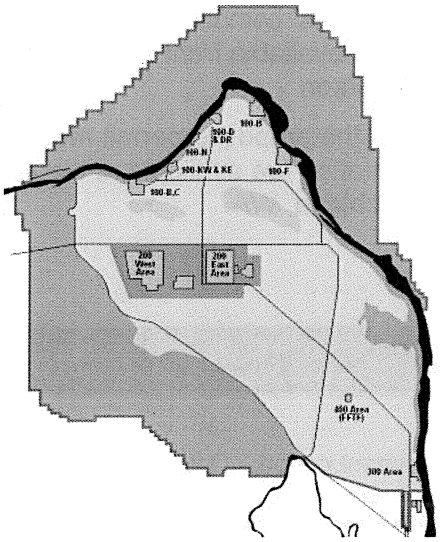
Steve Lowe
Washington State Department of Ecology
3100 Port of Benton Blvd
Richland, WA 99354
Email: Hanford@ecy.wa.gov

The documents are available for review at the Public Information Repositories listed below.

Portland State University Government Information Branford Price Millar Library 1875 SW Park Avenue Portland, OR 97207-1151 Attn: Claudia Weston (503) 725-4542	University of Washington Suzzallo Library Government Publications Dept. Box 352900 Seattle, WA 98195-2900 Attn: Hilary Reinert (206) 543-5597	US. Department of Energy Public Reading Room Washington State University, Tri Cities Consolidated Information Ctr., Rm. 101-L 2770 Crimson Way Richland, WA 99352 Attn: Janice Parthree (509) 375-3308	Gonzaga University Foley Center Library East 502 Boone Avenue Spokane, WA Attn: John Spencer (509) 313-6110	Ecology Nuclear Waste Program Resource Center 3100 Port of Benton Blvd. Richland, WA 93354 Attn: Valarie Peery 509-372-7950 Online: http://apps.ecy.wa.gov/pubcalendar/calendar.asp#comment_periods

Administrative Record:
Address: 2440 Stevens Center Place, Room 1101, Richland, WA.
Phone: 509-376-2530 **Web site address:** www2.hanford.gov/arpir/

Hanford Public Involvement Opportunity



We want to hear from you on the proposed permit modifications for an area of the Hanford Site!

Class 3 Permit Modification Fact Sheet
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, A7-75
Richland, WA 99352

From: ^TPA <TPA@RL.GOV>
Sent: Tuesday, October 01, 2013 3:51 PM
To: HANFORD-INFO@LISTSERV.WA.GOV
Subject: Department of Energy Announces Upcoming Public Comment Period

Upcoming Public Comment Period on proposed Permit Modifications at the Low-Level Burial Grounds Trenches 31 and 34, Central Waste Complex-Waste Receiving and Processing, and the T-Plant Complex

The U.S. Department of Energy plans to hold a 60-day public comment period on proposed modifications to the Hanford Facility Dangerous Waste Permit. These Class 3 modifications involve submittal of closure plans of specific storage areas at the following Treatment, Storage, and Disposal units (TSD units):

- Low-Level Burial Grounds Trenches 31 and 34
- Central Waste Complex-Waste Receiving and Processing
- T-Plant Complex.

All Class 3 Hanford permit changes require public comment on the proposed permit modification request, as well as a public meeting. The comment period for these modifications is expected to begin at the end of October.

From: ^TPA <TPA@RL.GOV>
Sent: Wednesday, October 30, 2013 4:20 PM
To: HANFORD-INFO@LISTSERV.WA.GOV
Subject: Public Comment Opportunity: Department of Energy Proposing Class 3 Changes to the Hanford Facility Dangerous Waste Permit
Attachments: 2013 Class 3 Modifications Fact Sheet Final.pdf

The U.S. Department of Energy Richland Operations Office (DOE-RL) is holding a 60-day comment period **from October 30, 2013 through January 6, 2014** on proposed Class 3 modifications to the Hanford Facility Dangerous Waste Permit. These changes are for the Low-Level Burial Grounds Trenches 31, 34 and 94; the Central Waste Complex and Waste Receiving and Processing Facility (CWC-WRAP); and the T-Plant Complex (T-Plant).

A public meeting will be held on **December 9, 2013, 5:30 to 6:30 pm**, at the Richland Public Library, 955 Northgate Dr. Richland, WA 99352.

The proposed changes are to close some parts of the following units in Hanford's Dangerous Waste Permit:

- Low-Level Burial Grounds Trenches 31, 34, and 94
- Central Waste Complex – Waste Receiving and Processing (CWC-WRAP) Facility
- T-Plant Complex

Parts of these storage areas will not receive future waste shipments. The proposed modifications include submittal of:

- Closure plans for the specific storage areas at these units
- Updated Part A permit applications
- Inspection and training plans for the storage areas during closure

This is the first of two public comment opportunities for this proposed permit change. You can comment on the permit request during this comment period. When the Washington State Department of Ecology issues a draft permit, you can comment on the proposed permit.

The DOE-RL contact person for this permit change is Kim Ballinger, (509) 376-6332. The Washington State Department of Ecology contact person is Steve Lowe, (509) 372-7950.

The permittees' compliance history during the life of the permit being modified is available from the Washington State Department of Ecology contact person.

APPENDIX B: COPIES OF ALL WRITTEN COMMENTS

From:	Amy Hagopian
To:	Hanford (ECY)
Cc:	office@hoanw.org
Subject:	Public Hearings needed, bar additional waste at Hanford
Date:	Sunday, December 29, 2013 4:07:38 PM

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

Dear Steve Lowe,

The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat ALL illegally stored wastes within 3 years. Our state's Department of Ecology should include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

Public hearings should be held across the region on the proposed changes, including Seattle.

The public notice for the next round of review, comment and hearings must fully disclose that these permit changes
were ordered by EPA due to USDOE illegally storing and disposing of wastes. The notice should disclose that wastes have leaked and explain the risks of prolonged storage.

The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; and, if leakage from disposal trenches is projected to contaminate groundwater.

Thank you for protecting the health of the people of the State of Washington.

Best wishes,
Amy Hagopian, PhD

for identification purposes only:
Associate Professor
Director, Community Oriented Public Health Practice
University of Washington School of Public Health
Box 357660, Seattle WA 98195-7660
Office: 206.616.4989 | Health Sciences H-688
Cell: 206.551.5313
hagopian@uw.edu

From: Beth Call
To: Hanford (ECY); office@hoanw.org
Subject: USDOE must follow law
Date: Friday, January 03, 2014 11:44:29 PM

To the Washington Dept. of Ecology:

You must require the USDOE to follow the law and have an enforceable schedule to remove and treat wastes from Hanford.

Instead the USDOE wants to import MORE waste to Hanford when they have already illegally and immorally transported and stored 68,000 drums of waste inside, and large waste containers containing radioactive and chemically lethal, wet, waste outside in leaking tanks, or in vast unlined trenches. (Officials from the DOE have dared to deny the leaks, claiming the leaked liquid is just rainwater though it has been tested and found to contain plutonium and lethal chemicals.) The possibility of a nuclear explosion like at Fukushima is a distinct possibility. But if we are lucky and escape an explosion, the leaking waste inevitably would enter the groundwater which seeps into the Columbia. The Columbia would no longer be able to support healthy fish nor would the water of the Columbia be safe for drinking, irrigation, recreation, or transportation. The Columbia Basin ultimately and for thousands of years would become unlivable for human beings. The radioactive and poisonous waste would continue on to contaminate the Pacific Ocean.

The Washington Department of Ecology has a moral and legal obligation to forbid the importation of any more nuclear & hazardous waste and to establish a schedule for the Department of Energy to treat and remove the hazardous waste already at Hanford. When Christine Gregoire was Attorney General she was able to get the Department of Energy to sign the Tri-Party Agreement for cleanup of Hanford. Unfortunately the DOE has fallen far behind in that schedule, but it should still be held accountable to clean up the Hanford waste as soon as is humanly possible, with specific dates set.

Please do not sell out the people of Washington state. Show the same courage and bargaining toughness that Christine Gregoire did.

HOLD PUBLIC HEARINGS. The public has the right to know what the DOE is planning and to provide their input.

Thank you,

Beth Call 509-529-0216 trollshouse@bmi net
102 Otis St.
Walla Walla, WA 99362

From:	Bjorn Lunde
To:	Hanford (ECY)
Subject:	new/old waste material
Date:	Sunday, December 29, 2013 3:23:53 PM

We can't allow new nuclear waste material to be stored at Hanford when all the old existing waste has not yet been safely handled and treated. Public participation and oversight in any process is essential: I expect the progressive State of Washington to set an international example of environmental responsibility!

Bjorn Lunde
326 N Wycoff Ave, Apt 3
Bremerton, WA 98312

From: Bloome Mark
To: Hanford (ECY)
Subject: no more waste at hanford
Date: Tuesday, December 31, 2013 12:46:24 PM

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why is ecology doing such a poor job in protecting the citizens interests by allowing more waste into hanford and not insisting that they clean it up.
no more waste at hanford the clean up situation there is a joke. they are incompetent, just look at the vit plant!

From:	Boni Biery
To:	Hanford (ECY)
Cc:	office@hoanw.org
Subject:	Stop the Dumping!
Date:	Monday, January 06, 2014 6:19:38 PM

I am writing to request that dumping of any more toxic waste at Hanford be stopped now AND that all the waste that has accumulated over the decades be responsibly addressed immediately. It is unbelievable tome that this life-threatening situation continues.

respectfully,
Boni Biery

From:	borsope@aol.com
To:	Hanford (ECY)
Cc:	"office\""@hoanw.org
Subject:	Cleanup at Hanford
Date:	Tuesday, December 31, 2013 1:02:17 PM

I am writing to ask the Washington State Department of Ecology to do the right thing and follow the laws on hazardous waste clean up and storage.

It is unconscionable that any consideration be given to any additional waste at Hanford until the current site is completely cleaned up.

There is material stored there illegally and containers leaking as well as unlined pits leaking.

The Hanford hazardous waste permit should require that all illegally and legally stored wastes be removed within three years on an enforceable schedule. This should include any waste inside as well as out side the Central Waste Complex.

In addition you should hold many public hearings for comment in various locations around the state, including my area near Bellingham.

The public notice for the next round of review, comment and hearings must fully disclose that these permit changes were ordered by EPA due to USDOE illegally storing and disposing of wastes. The notice should disclose that wastes have leaked and explain the risks of prolonged storage.

The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; and, if leakage from disposal trenches is projected to contaminate groundwater.

Thank you for your time,

Respectfully,

Pam Borso
P O Box 154
Custer, Wa 98240

From:	Brie Gyncild
To:	Hanford (ECY)
Subject:	Treat waste responsibly
Date:	Monday, December 30, 2013 12:29:06 PM

I am deeply concerned about recent decisions that would leave hazardous waste at Hanford, where it would continue to leak, and that would actually designate Hanford as an appropriate site for addtional hazardous waste. The Washington State Department of Ecology needs to enforce state hazardous waste laws, pushing back on the USDOE's irresponsible decisions.

I join Heart of America Northwest in calling for the following actions:

1. The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat ALL illegally stored wastes within three years. You should include a schedule or removing and treating the 68,000 drums of wastes already stored illegally inside CWC within three years, as well as a schedule to remove and treat all of the waste stored outside.

2. Public hearings should be held throughout the region. Clean water, soil, and air are a common right, and those affected by these decisions should know what's going on and should have a say. I especially want to see a hearing in the Seattle area, where I live, as well as hearings in communities that are closer to the Hanford site. (While Seattle may not be as close to the site, the Puget Sound region is the economic driver for the state and we're the ones who will pay the most if the state has to pick up the tab where USDOE fails.)

3. It must be clear in the public notice for the next round of review, comment, and hearings that these permit changes were ordered by the EPA due to USDOE illegally storing and disposing of wastes. The notice must disclose that wastes have leaked, and must clearly explain the risks that come with prolonged storage.

4. The Hanford RCRA permit should specifically bar USDOE from adding any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, as long as existing wastes are stored illegally ANYWHERE at Hanford, and if leakage from disposal trenches is projected to contaminate groundwater.

Thank you for protecting the welfare of the people of Washington state, and that of all other species who make their homes here.

Brie Gyncild
1407 15th Ave
Seattle, WA 98122-4117
206-325-3743
brie@wordyfolks.com

From: Candace Rose
To: Hanford (ECY)
Subject: CWC hazardous waste
Date: Monday, January 06, 2014 10:37:18 AM

To Steve Lowe

I am very concerned about the vast accumulation of hazardous waste from Hanford, and am even more concerned that additional waste is being transported to the CWC. I would like to urge a scheduled removal plan by USDOE for all the hazardous wastes.

I would also like to have public hearings regarding this serious problem in our area. I am in Walla Walla, and know that there are many of us who would like to have a hearing that we can attend.

I understand that some quantities of these hazardous wastes are leaking into the environment. This must be stopped, mitigated and prevented. It seems that our state laws are more stringent than the USDOE-- they should be brought to task in terms of legality and safety.

Thank you,
Candace Rose
805 1/2 North Main
Walla Walla, WA 99362

From: Carol Hiltner
To: Hanford (ECY)
Subject: Enforce our state laws!
Date: Saturday, January 04, 2014 10:03:14 AM

- Issue firm schedules treat and remove illegally stored wastes within 3 years;
- Hold public meetings in 2014

ENOUGH of USDOE's reckless poisoning of our lands and disregard of law! State hazardous waste law rules require that "closure" plans have specific enforceable schedules on which progress can be evaluated (WAC 173-303-610). USDOE's proposal fails to meet this standard. Instead, USDOE's proposed 'closure" plan merely says that eventually the wastes will be removed in keeping with a general deadline of the year 2030 in the Tri-Party Agreement. The rules also require that wastes be removed for treatment in under a year. For these illegally stored wastes, commercial treatment of the hazardous wastes with which they are mixed, **is available at the Perma-Fix NW treatment facility adjoining Hanford. USDOE has failed to ask Congress to fund removal and treatment. If included in the permit, USDOE will be required to ask Congress for the funding to meet the closure plan schedule.**

1. **Require USDOE to remove and treat ALL illegally stored wastes within 3 years.** Include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

2. **Hold public hearings** across the region on the proposed changes, including a hearing in Seattle.

3. **Fully disclose** that these permit changes were ordered by EPA due to USDOE **ILLEGALLY** storing and disposing of wastes in the public notice for the next round of review, comment and hearings.Disclose that wastes **HAVE LEAKED** and explain the risks of prolonged storage.

4. **Specifically bar USDOE from adding any more waste** from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; or if leakage from disposal trenches is projected to contaminate groundwater.

Best regards,

Carol Hiltner
Author & Artist
206-525-2101
carol.hiltner@gmail.com
www.AltaiMir.org
www.AltaiBooks.com
www.CarolHiltner.co

From:	Charlotte House
To:	Hanford (ECY)
Subject:	Legalize cleanup at Hanford
Date:	Monday, December 30, 2013 12:36:48 PM

This is really very simple: I vote NO to having contaminated ground water!

If you don't listen to what the public wants, then how to you expect us to be active citizens in our democracy? What will motivate the public (me) to TRUST my government if you do illegal acts and then don't respond to my efforts to hold you accountable? FIGHT WITH US -- not against us. NO ONE wants leakage at the Hanford site.

CLEAN IT UP! On schedule, as provided by law.

Public hearings in 2014 are another top priority to me. Stop avoiding the inevitable: listen and then act. Our voices are clear~!

Charlotte House
Involved and Concerned Voter

From:	Cristina Sundstrom
To:	Hanford (ECY)
Subject:	Re: Hanford waste
Date:	Sunday, December 29, 2013 2:43:37 PM

Art: Steve Lowe

Please treat and remove the illegally stored waste within 3 years and hold public meetings in 2014. Waste kills.

Sincerely,

C. Sundstrom

From:	Doris Fulton
To:	Hanford (ECY)
Cc:	Office (HOANW); Doris Fulton
Subject:	nuclear waste at Hanford
Date:	Sunday, December 29, 2013 2:11:04 PM
Importance:	High

I am a grandmother of a three-year-old named Evan . We both live in the state of Washington. It is immoral and illegal for Evan and his generation to be left with leaking drums of nuclear waste-waste which is quickly traveling to the Columbia River and threatening ground water. We need a specific enforceable process to deal with the nuclear waste at Hanford such as dry-case storage. Washington State was selected to produce plutonium for the atomic bombs in World War II. Our state was promised that the nuclear waste would be cleaned up, and it has not. Our government wants to ignore the problem and not only leave the nuclear waste but actually add more to it by transporting waste from around the country to our state exposing the public to cancer and potential catastrophic accidents. Public input must be heard about this issue. Meetings need to be scheduled in Seattle, Spokane, and Portland. Your proposal will jeopardize Evan's health and well-being as well as the health and well-being of our children. Can't we for once consider our children? Can't we for once consider the environment? Can't we for once consider the American people?

Doris Fulton
425-774-0225
20629 23rd Ave. W.
Lynnwood, WA 98036

From: Dorothy Lamb
To: Hanford (ECY)
Subject: Comment on RCRA Permit for CWC + Low-Level Waste Burial Brounds Trenches 31 & 34
Date: Monday, January 06, 2014 2:06:13 PM

Dear Washington DOE,

1- We need **public hearings** every year in many cities to give you a chance to hear the people and to educate the public. Written comments are not enough. We need to be able to ask you questions and to hear your replies to all the questions.
2- When you do give **notice** of the next round of review, comment, and hearings please fully disclose that the permit changes were ordered by EPA because USDOE is **illegally** storing & disposing of the wastes. And it should disclose that wastes have leaked, and disclose that wastes have leaked and explain prolonged storage risks
3- The CWC hazardous waste permit should require USDOW to **remove and treat** all illegally stored wastes within 3 years. And also have a schedule for removing and treating the 68,000 drums of wastes stored illegally inside within 3 years. And also have a schedule to remove and treat all the waste stored outside.
4- The Hanford RCRA permit should specifically **bar** USDOE from being allowed to add any more waste from offsite to Trenches 31 or 34 or any storage or disposal facility 1) while existing wastes are illegally stored anywhere at Hanford, and 2) if **leakage** from disposal trenches is projected to contaminate groundwater.

-Dorothy Lamb

From:	E Cruz
To:	Hanford (ECY)
Cc:	office@hoanw.org
Subject:	In regards to USDOE"s Proposed Changes to Hanford Hazardous Waste Permit for Central Waste Complex and Low-Level Waste Burial Grounds Trenches 31 &34
Date:	Monday, January 06, 2014 9:19:15 AM

To whom it may concern,
As a concerned citizen residing in the area of impact of the Hanford Hazardous Waste Complex, I would like to offer the following comments:
First, in accordance with state hazardous waste laws, the Hanford Hazardous Waste Permit for the CWC must require that USDOE remove and treat all illegally stored wastes within three years.
Secondly, citizens should be invited to public hearings across the region on the proposed changes. The next round of review, comment and hearings should include disclosure, including that permit changes were ordered by the EPA due to USDOE illegally storing and disposing of wastes at the site, and including that wastes have leaked, as well as explaining the risks associated with prolonged storage.
Finally, the Hanford RCRA permit should specifically bar USDOE from adding any additional wastes from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford;and, if leakage from any disposal tranches is projected to contaminate groundwater.
Thanks for your time,
Erendira Cruz

From:	Edward McAninch
To:	Hanford (ECY)
Subject:	Hanford waste
Date:	Monday, December 30, 2013 11:54:42 AM

Dear Sirs;

What is it about deadlines and prior agreements that you do not understand? My wife and I have been asking "what about the waste" since 1948, and our patience is running out. We thought that the new Secretary of DOE would be
an improvement, but we are rapidly becoming disillusioned.

From:	Elena Naskova
To:	Hanford (ECY)
Cc:	office@hoanw.org
Subject:	re: 68,000 Illegally stored Drums of Radioactive and Toxic Hanford waste
Date:	Sunday, January 05, 2014 7:03:33 AM

Dear Sir or Madam, Please follow the law and do the right thing with the Illegally stored Hanford waste. Please set firm, enforceable schedules to remove the thousands of illegally stored drums of radioactive chemical before there is an explosion or more leaks. Hazardous waste law requires removal within months, but they have sat for years. Your "closure" plan is dangerous, hazardous, and against the law, without taking peoples' and environment's safety into consideration. Swiping nuclear waste under the carpet is a bad bad idea.

Please involve the people whose life is affected by this and set up a public hearing across the region on the proposed changes. We take a pride in the North West, we love and cherish our environment, and we try hard to preserve this and leave our children what we got. Don't try to ignore us. Don't ruin it for us and our future generations.

Sincerely, Elena Naskova

From:	Elizabeth Raintree
To:	Hanford (ECY)
Subject:	Remove, clean up
Date:	Monday, December 30, 2013 12:55:18 PM

We expect you to do the required clean-up and waste removal, both as required by law. Nothing less will do.

Elizabeth Raintree, Ph.D.

From:	Fasnacht
To:	Hanford (ECY)
Cc:	Heart of America Northwest; Becker Sen. Randi; Cantwell, Maria; Swecker Sen. Dan; MacEwen, Drew; Pollet, Gerry; Rep. Sam Hunt; Reykdal Chris; Denny Heck for Congress
Subject:	HANFORD CLEANUP
Date:	Thursday, January 02, 2014 5:32:14 PM

I'll make this brief. HANFORD is already a disaster site, and USDOE has known it for years. I am convinced that is why USDOE hasn't kept its contracts with WA. and ORE since the 1970's. Their last report is a joke! Just ask "ethical" scientists in WA. and Oregon, and the nuclear waste industry.

You human beings who make the decisions for USDOE are already responsible for nuclear waste leaking into our magnificent COLUMBIA RIVER, AND UNAVOIDABLY INTO OUR PACIFIC OCEAN! ARE YOU INSANE? (Dumb question.)

THE PITY IS: For the illegally stored wastes at the Hanford site, and commercial treatment of the hazardous wastes with which they are mixed, TREATMENT IS AVAILABLE ! AT PERMA-FIX NW TREATMENT FACILITY adjoining Hanford. That doesn't take care of the entire problem, but it's a start, and is available! We don't have to wait for new science to start tackling part of the problem now!

But.....USDOE has failed to ask Congress to fund removal and treatment. If included in the permit, USDOE will be required to ask Congress for the funding to meet the closure plan schedule.

WHAT DO I RECOMMEND?

1. Immediate compliance by USDOE. Clean up Hanford, to the extent possible, as you have repeatedly promised and have repeatedly failed to even begin to do. Primarily, do whatever is humanly possible to keep the waste from contaminating the Columbia River and the Pacific Ocean. (If Congress refuses to fund the effort, make all those opposed to funding move to Hanford – permanently.)

2. Immediate freeze on all construction (and new licensing) of Nuclear Power Plants until "Science" comes up with a safe, permanent disposal – not storage, method. THAT'S DISPOSAL GUYS!

3. Funding for research to develop a safe, permanent disposal method. (All of us know glassification is not a disposal method but only a storage option.

4. Since the military has been a primary producer of nuclear waste, involve the Pentagon in solving the disposal problem.

5. If USDOE even proposes storage of additional nuclear waste at the Hanford site, I recommend that WA. and Oregon sue the United States Congress and USDOE for dereliction of duty, breach of contract, and

stupidity!

.....but that's just me..... A concerned citizen and former resident of the Tri-Cities, current lover of the Columbia and Pacific Coast, and I like life a lot too. Ain't much of that if you are poisoned by nuclear waste.

Sharon Fasnacht, Mediator, Guardian Ad Litem
Confidential Dispute Resolution
(360) 753 8009

From:	Forest Shomer
To:	Hanford (ECY)
Cc:	office@hoanw.org
Subject:	Proposed Changes to Hanford Hazardous Waste (RCRA) Permit
Date:	Sunday, December 29, 2013 2:05:41 PM

Governor Inslee, and Ecology officials:

I strongly object to the possible trucking of Transuranic Wastes from Ohio and California to Hanford.

Not only is the decades-long cleanup at Hanford behind schedule, there is the real possibility that USDOE will just add insult to injury by multiplying that cleanup backlog with more waste, in effect turning the site into a long-term storage site. **There has to be a finish line to this cleanup.**

Hanford was built largely to develop the bombs whose use ended World War II. We have been at peace with Japan for nearly 70 years, but the legacy of Hanford, and the toll it has taken on Downwinders and perhaps on the entire Lower Columbia River, has too long outlived any usefulness of the Hanford site. It becomes more difficult to tell whether Japan or our own country got the worst of that deadly bargain.

As a past attendee at Hanford public meetings in Seattle, I urge that dates be set at the earliest possible time for new public hearings to deal with the USDOE plan--in Seattle and at other appropriate localities. This is an issue of the greatest importance not only to those of us here to participate now, but for those who won't even be born for decades to come as the problem lingers on. My grandsons are growing up now in Washington--it is vitally important that they be given a decent chance to grow up and make their home in a state not burdened by decisions of convenience for the distant USDOE.

Not to be overlooked in this, is the possible imposition of a "mobile Chernobyl" on the highways of our state and every other state between Hanford and the points from which wastes could be shipped--even far-off Ohio. This is not responsible action by our government.
Sincerely,

Forest Shomer

PO Box 639
Port Townsend, WA, USA

From:	Jane Camero
To:	Hanford (ECY); office@hoanw.org
Subject:	Hanford Proposal Comments
Date:	Wednesday, January 01, 2014 11:10:56 AM
Attachments:	Hanford 2014.doc

Please see letter attached
All the best, Jane Camero

This email is free from viruses and malware because avast! Antivirus protection is active.

Ms. Jane Camero
1027 Columbia St
Hood River, OR 97031

January 1, 2014

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

Dear Mr. Steve Lowe:

I am writing on New Year's Day in hope that true clean-up will take place at the Hanford Nuclear Reservation. I insist that Washington State issue firm schedules to treat and remove the illegally stored wastes within 3 years. I also ask for public meetings in 2014, more honesty, exhuming and treating trench waste, as well as no further import of waste. I ask that USDOE proposal include asking Congress for funding.

It is time to change Hanford's hazardous waste (RCRA) permits for storing and disposing of radioactive wastes "mixed" with hazardous chemicals. It is my understanding that these important proposals are in response to a USEPA Order issued due to the violations of state and federal hazardous waste laws. We need to please be much more honest and much smarter. Illegally stored containers at the "Central Waste Complex" leaked, USDOE claimed the leakage was just rainwater!!! Sampling of the leakage in 2012 found cadmium, chromium, lead, mercury and polychlorinated biphenyls (PCB's). Hello!

USDOE's proposal needs to include enforceable schedules to remove and treat the wastes. Hundreds of people submitted comments to Ecology in 2012 on the Hanford hazardous waste permit urging that ALL illegally stored wastes should be removed from the Central Waste Complex and treated within three years. Ecology withdrew those proposed permit changes! USDOE's proposal blatantly omits any timeline for removing and treating the wastes. We need more than a Tri-Party Agreement for waste removal by 2030! State and federal hazardous waste law rules require "closure" plans to have specific schedules to allow tracking of progress, with complete removal of wastes in 180 days!!

Supposedly <u>dry</u> waste is leaking <u>liquid</u> and contaminating human beings. The wastes have been improperly misidentified and have been illegally stored for 18 years without a permit. But federal and state laws forbid storing wastes which are not dry and require that wastes be removed from storage to be treated within a year. Violations are deadly! That is why the law requires USDOE to remove hazardous wastes within a year. The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat all illegally stored wastes within 3 years. The Department of Ecology should include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

Violations continue in Hanford's Low-Level Waste Burial Grounds also where waste in 43 miles of trenches is just covered with dirt rather than exhumed and treated. Still only two trenches are lined? This has been illegal since the 1970's, when federal and state hazardous waste laws barred dumping garbage or hazardous waste. Last year the EPA documented that USDOE had illegally buried "high temperature gas reactor" and other drums of mixed chemical and radioactive wastes in the trenches without treatment. USDOE's proposal IS a 'cover-up', not cleanup and exactly why the permit should

require exhuming and treating wastes from all of Hanford's trenches. No further offsite waste should be added. It is imperative that we protect our groundwater!!

I have a question: Why didn't the notice sent by USDOE and Washington Ecology disclose that the proposal is the result of an EPA Order due to USDOE's illegal storage and disposal of wastes? These notices are counterproductive for Hanford cleanup. When another public comment period on Ecology's response in 2014 is scheduled, public notices should fully disclose key facts! I would like to see public hearings o the proposed changes across the region, including in Hood River, OR.

Most disturbingly, on December 13, 2013, USDOE issued a formal decision on the Tank Closure Waste Management EIS that it may bring MORE waste to Hanford, but will delay import until it has the vitrification plant operating. Whether the vitrification plant operates has no bearing on USDOE's ability to safely store or dispose of more waste at Hanford. The USDOE has failed to consider the risks of shipping and storing the wastes at Hanford. There was no Environmental Impact Statement and USDOE did not have a hazardous waste permit to store the wastes! There is no safe storage for these wastes and the USDOE fails to have them treated to make them safe to store. The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford. The USDOE has failed to ask Congress to fund removal and treatment. If included in the permit, USDOE will be required to ask Congress for the funding to meet the closure plan schedule. Why for God's sake not?? We need all the help we can get to make the reservation and the Columbia River safe.

Thank you for taking written comments. May our new year bring more positive changes to Hanford.

Sincerely,

Jane Camero

COPY
Review & Recycle

Ms. Jane Camero
1027 Columbia St
Hood River, OR 97031

January 1, 2014

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

JAN 06 2014

DEPARTMENT OF ECOLOGY
NWP - RICHLAND

Dear Mr. Steve Lowe:

I am writing on New Year's Day in hope that true clean-up will take place at the Hanford Nuclear Reservation. I insist that Washington State issue firm schedules to treat and remove the illegally stored wastes within 3 years. I also ask for public meetings in 2014, more honesty, exhuming and treating trench waste, as well as no further import of waste. I ask that USDOE proposal include asking Congress for funding.

It is time to change Hanford's hazardous waste (RCRA) permits for storing and disposing of radioactive wastes "mixed" with hazardous chemicals. It is my understanding that these important proposals are in response to a USEPA Order issued due to the violations of state and federal hazardous waste laws. We need to please be much more honest and much smarter. Illegally stored containers at the "Central Waste Complex" leaked, USDOE claimed the leakage was just rainwater!!! Sampling of the leakage in 2012 found cadmium, chromium, lead, mercury and polychlorinated biphenyls (PCB's). Hello!

USDOE's proposal needs to include enforceable schedules to remove and treat the wastes. Hundreds of people submitted comments to Ecology in 2012 on the Hanford hazardous waste permit urging that ALL illegally stored wastes should be removed from the Central Waste Complex and treated within three years. Ecology withdrew those proposed permit changes! USDOE's proposal blatantly omits any timeline for removing and treating the wastes. We need more than a Tri-Party Agreement for waste removal by 2030! State and federal hazardous waste law rules require "closure" plans to have specific schedules to allow tracking of progress, with complete removal of wastes in 180 days!!

Supposedly dry waste is leaking liquid and contaminating human beings. The wastes have been improperly misidentified and have been illegally stored for 18 years without a permit. But federal and state laws forbid storing wastes which are not dry and require that wastes be removed from storage to be treated within a year. Violations are deadly! That is why the law requires USDOE to remove hazardous wastes within a year. The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat all illegally stored wastes within 3 years. The Department of Ecology should include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

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require exhuming and treating wastes from all of Hanford's trenches. No further offsite waste should be added. It is imperative that we protect our groundwater!!

I have a question: Why didn't the notice sent by USDOE and Washington Ecology disclose that the proposal is the result of an EPA Order due to USDOE's illegal storage and disposal of wastes? These notices are counterproductive for Hanford cleanup. When another public comment period on Ecology's response in 2014 is scheduled, public notices should fully disclose key facts! I would like to see public hearings o the proposed changes across the region, including in Hood River, OR.

Most disturbingly, on December 13, 2013, USDOE issued a formal decision on the Tank Closure Waste Management EIS that it may bring MORE waste to Hanford, but will delay import until it has the vitrification plant operating. Whether the vitrification plant operates has no bearing on USDOE's ability to safely store or dispose of more waste at Hanford. The USDOE has failed to consider the risks of shipping and storing the wastes at Hanford. There was no Environmental Impact Statement and USDOE did not have a hazardous waste permit to store the wastes! There is no safe storage for these wastes and the USDOE fails to have them treated to make them safe to store. The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford. The USDOE has failed to ask Congress to fund removal and treatment. If included in the permit, USDOE will be required to ask Congress for the funding to meet the closure plan schedule. Why for God's sake not?? We need all the help we can get to make the reservation and the Columbia River safe.

Thank you for taking written comments. May our new year bring more positive changes to Hanford.

Sincerely,

Jane Camero

From:	Jesse Phillips
To:	Hanford (ECY)
Subject:	comments at: office@hoanw.org
Date:	Saturday, January 04, 2014 2:41:25 PM

Dear Sir or Madam,
I'm writing to submit my comment regarding the changes in permitting at the Hanford storage area.

The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat ALL illegally stored wastes within 3 years. Ecology should include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

I demand that public hearings be held across the region on the proposed changes, including a hearing where you live.

The public notice for the next round of review, comment and hearings must fully disclose that these permit changes were ordered by EPA due to USDOE illegally storing and disposing of wastes. The notice should disclose that wastes have leaked and explain the risks of prolonged storage.

The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; and, if leakage from disposal trenches is projected to contaminate groundwater.

Thank you,

Jesse Phillips, WA resident

From:	JOAN H WARD
To:	Hanford (ECY)
Cc:	office@hoanw.org
Subject:	USDOE's Proposed Changes to Hanford Hazardous Waste (RCRA) Permit for Central Waste Complex (CWC) and Low-Level Waste Burial Grounds Trenches 31 & 34
Date:	Tuesday, December 31, 2013 2:43:50 PM

To the Department of Ecology,

According to the EPA Consent Agreement and Final Order, Hanford is storing hazardous waste without a permit, has failed to meet closure plan requirements, has failed to submit closure notice and closure plans, and failed to comply with land distribution restriction requirements. The USDOE has knowingly and deliberately ignored the CAFO's order to submit a written closure plan within 120 days of the effective date of the order which was June 26, 2013.

USDOE's proposal to deal with Hanford's hazardous waste fails to meet the standards required by Washington State hazardous waste law rules. The illegally stored containers at Hanford's "Central Waste Complex" have leaked numerous times, and the USDOE's response to the EPA's Consent Agreement and Final Order was without the required schedule for clean-up. State and federal hazardous waste law rules require "closure" plans to have specific schedules to allow tracking of progress, with complete removal of wastes in 180 days.

I earnestly ask you to include these vital points in the RCRA permit.

1. The Hanford hazardous waste permit for the Central Waste Complex should require USDOE to remove and treat ALL illegally stored wastes within 3 years.

2. It is important that there should be a sincere effort to implement truly **public** hearings in other areas besides Richland that are affected by Hanford waste, which include but are not limited to communities downwind, downstream, and along proposed transportation routes bringing waste to Hanford from around the country.

3. The public notice for the next round of review, comment and hearings must fully disclose that these permit changes were ordered by EPA due to USDOE illegally storing and disposing of wastes. The notice should disclose that wastes have leaked and explain the risks of prolonged storage in order to have truly informed participation.

4. The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford. Nor should they be allowed to add any more waste if leakage from disposal trenches is projected to contaminate groundwater.

Also, I can't help but point out the actual lack of "good faith efforts to comply" on the USDOE's

part and seriously question the paltry sum of $136,000 as a penalty for such agreed acknowledgment of the seriousness of the violations, and would expect additional civil penalties.

Taken directly from Docket No.: RCRA-10-2013-0113:

4.3 In light of the seriousness of the violations, Respondent's good faith efforts to comply, Respondent's actions to correct the violation after having been notified by Complainant,
Respondent's willingness to settle this matter without litigation, and in accordance with the RCRA Civil Penalty Policy, EPA has determined and Respondent agrees that an appropriate penalty to settle this action is ONE HUNDRED THIRTY-SIX THOUSAND DOLLARS ($136,000).

4.12 Under section 3008(c) of RCRA, 42 U.S.C. 0928(0, a failure to take corrective action within the time specified in the Final Order may subject Respondent to additional civil penalties for each day of continued noncompliance.

I urge you! Do not approve a permit with NO enforceable schedule and no deadline to remove wastes before 2030!!

Thank you for your consideration.

Joan H Ward
P.O. Box 160
Carlsborg WA 98324

From:	Joe Mitter
To:	Hanford (ECY)
Cc:	office@hoanw.org
Subject:	supporting the goals of Heart of America NW
Date:	Tuesday, December 31, 2013 3:14:16 PM

I am writing in support of the goals espoused by Heart of America NW. It is critical that reasonable timetables be established and that DOE continue to be pressured to remove hazardous nuclear wastes, and also to deal with the 68,000 of waste in containers which are currently failing or at risk of failing.

Joe Mitter
kalanicorp@gmail.com

From:	Judy Pigott
To:	Hanford (ECY)
Cc:	office@hoanw.org
Subject:	Hanford: Clean Up? Comments
Date:	Sunday, December 29, 2013 7:43:23 PM

Dear Mr Lowe,
I know I've commented before, yet prior to the end of 2013 I want to again say how crucial I believe it to be that clean up of nuclear waste at the Hanford site be accelerated rather than deferred or deemed unnecessary. With leaking wastes moving inexorably toward the Columbia River it would seem incongruous at best to add to the waste load or to ignore the issue.
The schedules for clean up have been adjusted to longer terms again and again, despite public comment and concern. To now move toward increased dumping and storage, toward disregard for clean up, and toward more environmental degradation is baffling to me.
Please do what is required to remove and treat the wastes that have already been stored at Hanford. Stop importing any more radioactive or chemical wastes from nuclear weapons production and energy facilities. Avoid disasters by recognizing that transportation alone has a high level of danger. And, lastly, move the clean up schedules ahead!
Thank you for reading this. Thank you, in advance, for any actions you may take to help change the course of recent USDOE decisions that are contrary to these comments.
Yours, respectfully, Judy
--
Judy Pigott
1718 Palm Ave SW
Seattle, WA 98116
206-933-6577 (h) 206-948-0125 (cell)
www.PersonalSafetyNets.org *(new!)*
Have you signed up for our monthly newsletter yet?

2013: A year of Abundance Through Appreciation

May the Spark in your soul, light the world forever

From: Laura Milner
To: Hanford (ECY)
Subject: League of Women Voter Presentation
Date: Monday, December 30, 2013 8:09:36 AM

Ms. Wireman, Laura Milner here. I was sorry to have missed your presentation to Rotary but I believe Debbie DeSoer from Rotary inquired as to whether you are available to speak to other groups. I am interested to know if you are available to speak to the League of Women Voters on either Wednesday March 12 for our lunch meeting or on Wednesday, April 16th for our 7:00 pm meeting. I don't know what you know about League but most people know us in the context of Candidate's Nights. We also are interested in various facets of policy and energy is one of those things we would like to know more about. Do let me know if any of this works for you. If you interested, then I can call you and work out further details. For neither time would we be equipped to have a powerpoint presentation, etc. We are a very informal group..a few handouts and a couple of talk points would suffice. Do let me know and enjoy the rest of your holidays (what is left of them). Kind regards, Laura

Laura M. Milner, Ph.D.
Associate Dean, College of Business
Central Washington University
400 East University Way
Ellensburg, WA 98926-7487
Phone: 509-963-2933
Fax: 509-963-3042
email: milnerl@cwu.edu

From: Lowe, Steven (ECY)
Sent: Monday, December 09, 2013 10:19 AM
To: Alexander, Debra (ECY)
Subject: FW: public comment on Hanford

From: Holmes, Erika (ECY)
Sent: Monday, December 02, 2013 10:39 AM
To: Lowe, Steven (ECY); Brown, Madeleine (ECY)
Cc: Bohrmann, Dieter (ECY); Palomarez, Adam (ECY)
Subject: FW: public comment on Hanford

FYI, you got a comment.

From: Hanford (ECY)
Sent: Friday, November 29, 2013 3:00 PM
To: Palomarez, Adam (ECY); Holmes, Erika (ECY); Bohrmann, Dieter (ECY)
Subject: FW: public comment on Hanford

From: leah boehm
Sent: Friday, November 29, 2013 2:59:55 PM (UTC-08:00) Pacific Time (US & Canada)
To: Hanford (ECY)
Cc: bradymarka@yahoo.com
Subject: public comment on Hanford

I am very concerned that the notice from agencies failed to disclose that the Central Waste Complex and "WRAP" facilities which are subject of half the permit changes have 68,000 illegally stored drums of waste. Several have leaked in the past two years, including some which are illegally stored outside. Heart of America Northwest called on Ecology last year to include new permit conditions to require all wastes to be removed and treated within 3 years. That's generous, hazardous waste laws limit storage time to under a year before waste must be removed for treatment. Treatment facilities are available for these wastes, but USDOE won't pay for it until forced to.
Take care of it please.

Leah

From:	Linda good
To:	Hanford (ECY)
Subject:	Hanford
Date:	Sunday, December 29, 2013 3:48:22 PM

We support Heart of America Northwest in their efforts to clean up Hanford. Please remove & treat waste, have public hearings, and don't add any more waste.
We need to protect Washington State, the ground water, and the Columbia River.
Linda & Leonard Good

From:	Lisa McKhann
To:	Hanford (ECY)
Cc:	office@hoanw.org
Subject:	public hearings on Hanford cleanup
Date:	Friday, January 03, 2014 8:43:55 AM

To whom it may concern:

I write to share my opinion that public meetings should be held to discuss disposal of hazardous waste from the Hanford Nuclear Reservation. Having once lived in Eastern Washington (as well as both coasts), I understand the importance of water quality — both groundwater and rivers like the Columbia. Citizens need to have time and space to discuss, learn, listen and weigh in on these gargantuan, longg-term environmental questions. Any agency charged with environmental regulation and protection must adequately inform and involve citizens. This is not just a local issue. As we know from other nuclear incidents, damage has global effects.

Thank you for your time,

Lisa

Elizabeth M McKhann
2109 Minnesota Ave
Duluth, MN 55802
(218) 722-6190
lisa@projectlulu.org

From:	M Buck
To:	Hanford (ECY)
Cc:	office@hoamnw.org
Subject:	Hanford nuclear waste
Date:	Friday, January 03, 2014 1:18:34 PM

Dear Mr. Lowe,

I have just received notice that there are plans, all be it delayed, to continue adding to the nuclear waste currently stored at Hanford, WA facilities. Please stop this plan and work in support of continued clean up at this site not added waste. I understand that these wastes go somewhere and the larger problem is continuing to produce them without good solutions to the waste issue. However, this location is far to close to the Columbia River and the threat of the nuclear material intrusion into the water ways is far to great.

Respectfully,
Marti Buck

From:	Meredith Crafton
To:	Hanford (ECY)
Cc:	Tom Carpenter
Subject:	Hanford Challenge Comments Class 3 modifications to the Hanford Facility Dangerous Waste Permit for LLBG Trenches 31, 34 and 94, the CWC-WRAP, and T-Plant
Date:	Monday, January 06, 2014 5:13:29 PM
Attachments:	2014.01.06 Hanford Challenge Comments Class 3 RCRA Permit Mods LLBG CWC TPlant.pdf

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Dear Mr. Lowe,

Attached please find Hanford Challenge's comments on the proposed Class 3 Modification to Hanford's Hazardous Waste Permit.

We look forward to Ecology's response to our comments.

Sincerely,

Meredith Crafton
Hanford Challenge
Advocacy and Policy Coordinator
219 1st Ave S., Suite 310
Seattle, WA 98104
206.292.2850 ext.26
c: 206.280.7011
www.hanfordchallenge.org

Working for a safe and effective cleanup of the Hanford Nuclear Site.

The information contained in this e-mail message may be privileged, confidential and protected from disclosure. This E-mail is covered by the Electronic Communications Privacy Act, 18 USC Sections 2510-2521. This information may be confidential and is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. ***If you think that you have received this e-mail message in error, please notify the sender via e-mail or by telephone at 206-292-2850, ex 26.***

Hanford Challenge • 219 1st Ave S, Ste 310, Seattle, WA 98122 206.292.2850 hanfordchallenge.org

Monday, January 6, 2013

Steve Lowe
Washington State Department of Ecology
3100 Port of Benton Blvd
Richland, WA 99354
Email: Hanford@ecy.wa.gov

Re: Class 3 modifications to the Hanford Facility Dangerous Waste Permit for LLBG Trenches 31, 34 and 94, the CWC-WRAP, and T-Plant.

Dear Mr. Lowe,

Hanford Challenge is an independent 501(c)3 organization based in Seattle, WA which exists to help create a future for Hanford that secures human health and safety, advances accountability, and promotes a sustainable environmental legacy. Hanford Challenge collaborates with NW stakeholders, including the Hanford workforce, Tribes, Hanford Advisory Board members, community organizations, and concerned citizens to advocate for safe and protective cleanup remedies at the Hanford Nuclear Site.

Hanford Challenge maintains a membership base of around 1,600 people and an extended network of 179,798 people who receive our regular updates about Hanford cleanup. Many of Hanford Challenge's members live, work, and/or recreate on and around the Columbia River. Others work at Hanford and/or have a strong interest in assuring the protection of Columbia River and the groundwater that feeds it.

Below please find Hanford Challenge's comments on the US Department of Energy's (DOE) October 11, 2013 submission of a Class 3 Modifications to the Hanford Site RCRA Permit for the Low-Level Burial Grounds (LLBG) Trenches 31, 34 and 94, the Central Waste Complex and Waste Receiving and Processing Facility (CWC-WRAP) and the T-Plant Complex (T-Plant).

I. The Washington State Department of Ecology fact sheet on the Class 3 Permit Modification should have informed the public of the illegal storage of waste and the EPA CAFO.

First, it is important to point out that these proposed permit modifications are a result of a June 26, 2013 U.S. Environmental Protection Agency Consent Agreement and Final Order (Docket No: RCRA-10-2013-0113) requiring initiation of closure of several Hanford Site Dangerous Waste Management Units which had been operating out of compliance. This important context was not acknowledged in the public notice and "Fact Sheet." DOE was charged with storing RCRA regulated dangerous waste without a permit or interim status in violation of Section 3005 of RCRA, 42 U.S.C. § 6925, WAC 173-303-800, and Condition I.A. of the Hanford Facility RCRA Permit. DOE was also charged with failure to comply with Land Disposal Restriction requirements when in 2010 it disposed of 52 mixed dangerous waste/low-level waste (MLLW)

high-temperature gas reactor (HGTR) drums in Trench 34, and subsequently disposed of eight (8) (MLLW) high-temperature gas reactor boxes and two (2) MLLW drums in Trench 34 without first satisfying applicable treatment standards. Some of these drums and boxes have leaked and many have been stored out of compliance for years.

The Department of Ecology should have clearly informed the public that this permit modification was a legal requirement of the DOE due to its illegal storage and treatment of dangerous waste. During any subsequent comment periods and public meetings on these modifications, we request that Ecology clearly inform the public of the illegal actions of the Department of Energy and explain what Ecology is actually doing to ensure the illegally stored waste is properly removed and treated. The public notice for the next round of review, comment and hearings should fully disclose that permit changes were ordered by EPA due to the DOE illegally storing and disposing of wastes.

II. The piecemeal permit modification process and interim permitting must change.

This piecemeal and interim permitting process needs to end. It is not sufficiently protective of public health and the environment, does not sufficiently inform the public, and arguably is not legally compliant. In 2012, Ecology issued a draft permit for the dangerous waste management units addressed in this current permit modification request. Hundreds of comments were submitted requesting DOE comply with WAC 173-303 regulations for operation of facilities which treat, store, and dispose of wastes and closure [including removal of illegally stored waste] of illegally operating units on the Hanford site. A complete permit is still many years away, and insufficient permitting continues to complicate the regulatory pathways for permit modifications and the public review of related documents.

"Partial permitting" of the CWC, T Plant, WRAP, LLBG TSDFs should not be allowed. These Treatment, Storage or Disposal facilities (TSDFs) have not had a place in Rev 8(c) of Hanford's RCRA Permit and have never been fully assessed. Ecology must ensure that USDOE submit a complete Part B Application for CWC/WRAP, T-Plant, and the LLBGs that are currently operating without a permit. Ecology needs to ensure that DOE meet all the requirements for Final Facility Permits WAC 173-303-806 for each TSD Unit. The current piecemeal approach gives DOE continued noncompliant operation. If these modifications are accepted DOE continues to operate without a Waste Analysis Plan, Process Information or Ground Water Monitoring Plans (for the land disposal units). Ecology should demand these plans and the public deserves more information.

Part A forms for the proposed permit modifications for unit closures <u>cannot</u> authorize any treatment, storage, or disposal of dangerous mixed wastes except as specifically identified by the approved closure plan. Any authorization for treatment, storage, or disposal in a new Dangerous Waste Management Unit must be in accordance with a permit modification request per WAC 173-303-830/840 and include the information required in the Part A and Part B permit application. (E.g., Placement of [storing] containers next to LLBG trenches is not in compliance

with WAC 173-303-140(4)-Dangerous Waste regulations as this allows a non-compliant RCRA design in-lieu of building a compliant storage facility.)

III. The Hanford RCRA Permit should require DOE to remove and treat all illegally stored waste and Ecology should require DOE to submit a Waste Analysis Plan, Process Information, Ground Water Monitoring Plans, and a specific enforceable schedule for meeting compliance.

The Hanford RCRA permit should require DOE to remove and treat ALL illegally stored wastes. State hazardous waste law rules require that "closure" plans have specific enforceable schedules on which progress can be evaluated (WAC 173-303-610). DOE's proposal fails to meet this standard. The submitted Closure Plans fail to compel DOE to do work now. The proposed schedule and listing of Tri-Party Milestones [acknowledging a general TPA agreement for removal by 2030] does not fulfill WAC 173-303-610 requirements.

Closure plans must comply with the WAC 173-303-610 requirements and do not 'simply represent a baseline for closure' as stated. WAC 173-303-610(3)(iv thru vi) requires more information and details that have not been included in the submitted Closure Plans. DOE's closure plans lack detailed descriptions of steps needed to remove or decontaminate all dangerous waste residues and contaminated containment system components, equipment, structures and soils, including methods for sampling and testing of surrounding soils and criteria for determining the extent of decontamination required to satisfy the closure performance standards.

Ecology should require DOE to submit a Waste Analysis Plan, Process Information, Ground Water Monitoring Plans, and a specific enforceable schedule for meeting compliance.

IV. All "trenches" are subject to Dangerous Waste Regulations and should be recognized as such.

Low Level Burial Ground Part A Application(s) prior to this included all of the burial grounds not just Trenches 31, 34 and 94. DOE must continue to follow RCRA Requirements for all LLBGs. The Part A form should at least identify, and does not, all LLBG trenches as subject to Dangerous Waste Regulations until such time that characterization (including actively digging up waste to be able to conduct sampling) demonstrates it is <u>not</u> RCRA waste.

V. The Hanford RCRA permit should specifically bar DOE from adding offsite wastes to the trenches.

The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; and, if leakage from disposal trenches is projected to contaminate groundwater. Furthermore, Trenches 31 & 34 are twenty years past their *intended operational life*.

VI. Combining Trenches 31 and 34 with 94 appears problematic.

Combining Trenches 31, 34 and 94 together as one Operating Unit Group (OUG) makes little sense and is problematic. Geographically 31 and 34 are in 200 West and DOE is proposing to treat "debris" on asphalt pads adjacent to the disposal trench for mixed waste. Trench 94 is located in 200 East and stores decommissioned navy nuclear reactors. Groundwater science for these two areas and practices is very different and requirements have not been addressed. Ground Water Plans and Waste Analysis Plans for these trenches will be extremely different and should not be combined.

VII. Combining CWC and WRAP into on Operating Unit Group make public review and oversight very difficult.

Previously, CWC and WRAP were managed as separate OUGs. The primary mission and operational capabilities of the facilities are different. Combining these two facilities into one unit makes public reviews very difficult. The continued mismanagement of containers [e.g., labeling discrepancies and non-permitted storage of dangerous waste] is a significant issue and the closure plans for these areas is full of discrepancies. The submitted closure plans need reviews for accuracy & consistency with Part A forms. There are inconsistencies between units listed on Part A forms and Closure Plans; inconsistencies in measurement units between Part A forms and Closure Plans; inconsistencies with design capacities and total volumes of waste, etc. Furthermore, without access to the 2004 Permit Applications and the current RCRA Permit Rev. 8C, the public cannot fully determine if information presented within these modification documents is accurate or legally authorized.

VIII. The Inspection Plans are insufficient and noncompliant.

We have not seen any documentation to support a claim that these facilities are in *safe configuration.* Until closed, facility inspections must be done per WAC 173-303 regulations (e.g., daily inspections of spill areas; tanks require daily visual inspections). DOE did not apply all Dangerous Waste Laws as required, and there are no sections on container receipt and inspection or non-acceptable waste shipment within the Inspection or Closure Plans.

With the history of noncompliance, Ecology must require and follow through with stringent inspection plans.

IX. Personnel Training Plans are also insufficient.

The proposed plan should be structured to reflect both closing CWC closing units and operational units to comply with WAC 173-303-330 requirements. These plans further the idea that only trenches in the LLBG are Trenches 31, 34, and 94 and that CWC & WRAP have authority to be designated as one facility. As mentioned above, this is problematic.

The training matrix tables do not include all necessary personnel such as a building emergency director, regulatory compliance specialists, or groundwater samplers. The Operations Supervisor should be trained in all areas and additional trainings should be required for other listed personnel, including inspectors and groundwater samplers.

X. DOE has failed to demonstrate good faith or instill confidence that it will take steps to prevent threats to human health and the environment.

Operational history at these facilities fails to substantiate DOE's claim to have demonstrated it has (or will) take steps to prevent threats to human health and the environment including compliance requirements. These dangerous waste management units have already failed and been so poorly managed so as to result in releases to soils and the environment. To name a few of many examples: the floor of Room 152 is sealed concrete and does not provide secondary containment; Dangerous waste containers meeting the criteria specified in WAC 173-303-630(7)(c) are stored on standard pallets to ensure elevation off of the concrete floor; Dangerous waste packages not meeting the criteria specified in WAC 173-303-630(7)(c) (e.g., waste package containing free liquids) are placed on portable spill containment equipment such as spill pallets meeting the criteria specified in WAC 173-303-630(7)(a)and (b) while 7(c) bars free liquid storage in noncompliant facility storage.

CONCLUSION

The Department of Ecology should require enforceable schedules to remove and treat waste illegally stored at Hanford. Units which are easily and safely accessible should not delay or defer required closure actions subject to TPA Milestones. The practice of illegally storing waste must end. DOE's Permit Modification and Closure plans do not provide sufficient information for the public or regulators to make informed decisions. This history of noncompliance and environmental releases in these areas must be acknowledged and remedied.

Ecology should ensure that DOE submit a complete Part B Application for CWC/WRAP, T-Plant, and the LLBGs that are currently operating without a permit. Ecology needs to ensure that DOE meet all the requirements for Final Facility Permits WAC 173-303-806 for each TSD Unit.

The current piecemeal approach gives DOE continued noncompliant operation. If these modifications are accepted, DOE will continue operating without a Waste Analysis Plan, Process Information or Ground Water Monitoring Plans (for the land disposal units). The public deserves more information and more accountability.

Sincerely,

Tom Carpenter, Executive Director
Hanford Challenge

Meredith Crafton, Advocacy and Policy
Hanford Challenge

From: Michelle Devlaeminck
To: Hanford (ECY)
Subject: hanford clean up
Date: Monday, December 30, 2013 2:07:04 PM

Please make a follow a real timeline for cleaning up the hanford waste. Try using NDTB-1 to transform the waste into an inert material instead of trying to transport it someone else for storage.

From: Mike Rose
To: Hanford (ECY)
Subject: Comments on USDOE's Proposed Changes to Hanford Hazardous Waste (RCRA) Permit for Central Waste Complex (CWC) and Low-Level Waste Burial Grounds Trenches 31 & 34
Date: Sunday, December 29, 2013 2:31:33 PM

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1. The RCRA permit for the CWC should require USDOE to remove and treat ALL illegally stored wastes within 3 years.
Within 3 years, Ecology should schedule the removal and treatment of the 68,000 drums of wastes stored illegally inside CWC, as well as remove and treat all of the waste stored outside.
2. There should be public hearings across the region on the proposed changes, including a hearing here in Eugene. They should not be scheduled during holiday periods so as to prevent public attention.
3. The public notice for the next round of review, comment and hearings must fully disclose that these permit changes were ordered by EPA due to USDOE illegally storing
and disposing of wastes.
As the recent mailed notice shows, USDOE and the Washington Department of Ecology have been disingenuous regarding government transparency. The notice should clearly disclose that wastes are sometimes mislabeled and have leaked and explain the risks of prolonged storage. In particular, we could locate no official maps of the Hanford site showing the locations of these areas and topographical correspondences. We were able to locate only a tiny blurry map with inadequate detail at the HoANW website. The citizenry cannot make decisions in the dark. This is a geologically active region. With the consequences of any large geological event halting hydroelectric energy production in the area with possible long down times. So more than just the citizenry will be in the dark; that energy capacity would be needed in the ensuing massive disaster cleanup and cooling of certain high-level waste. In addition, the location of streams and dammed reservoirs north of Hanford in an earthquake and active geological region leave storage at Hanford to place downstream municipalities, aquifers, fishing industry, water supplies and ecosystems at large risk. Hanford nuclear facilities located at the river edge, already jeopardize the public and human activities. Disaster cleanup personnel would be exposed to large radiation exposures; what part of society does the USDOE think of as expendable? The public think in terms of Three-mile Island, Chernobyl and Fukashima. It is incredulous that a President so interested in health issues should be so blind to this issue.
4. The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; and, if leakage from disposal trenches is projected to contaminate groundwater.

Sincerely,

Mike and Annette Rose
3891 Ashford Dr
Eugene, OR 97405
541-343-3897

From:	Mike
To:	Hanford (ECY); Heart of America NorthWest
Subject:	re: More waste & open trenches at Hanford
Date:	Tuesday, December 31, 2013 2:25:38 PM

Steve Lowe:

December 31, 2013
Department of Ecology
3100 Port of Benton Blvd
Richland WA 99354

I have monitored the "progress" of the Hanford "cleanup" since my days at Gonzaga U, I graduated in 1971.

The Hanford "cleanup" would make a great black comedy – unfortunately as time has gone on, the "cleanup" has become more of a joke.

Now YOU and the rest of Department of Ecology have bent completely over, and let the USDOE & EPA turn Hanford into a political clusterfudge. Billions have been spent w/ little to show!

NO MORE RADIOACTIVE WASTE – CLEANUP ALL OF THE MESS !!

Hanford needs the lights turned i.e., like Whale Wars or Most Wanted – if the general public got interested in how much has been spent and how little has been accomplished AND the consequences of the inept handling of this HUGE amount of nuclear material - that is really the only way the Hanford mess is going to get cleaned up.

REPLACE ALL THE TANKS BEFORE THEY LEAK MORE INTO THE COLUMBIA RIVER !!

Here are some recommendations:

1) **Remove and treat ALL illegally stored wastes within 3 years.**
2) **Demand public hearings for changes – so the general public understands what the consequences are of your proposed ineptness.**
3) **Stop all waste being added to open trenches**

How do you sleep at night?

Mike Conlan BS, DDS, MHA

Cc Governor Jay Inslee, Senator Patty Murray, Senator MariaCantwell, Heart of America NW, Hanford Challenge

From:	Mike
To:	info@hanfordchallenge.org; Hanford (ECY)
Subject:	re: illlegal waste and open trenches
Date:	Friday, January 03, 2014 12:37:27 PM

Steve Lowe:

December 31, 2013
Department of Ecology
3100 Port of Benton Blvd
Richland WA 99354

I have monitored the "progress" of the Hanford "cleanup" since my days at Gonzaga U, I graduated in 1971.

The Hanford "cleanup" would make a great black comedy – unfortunately as time has gone on, the "cleanup" has become more of a joke.

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3) **Stop all waste being added to open trenches**

How do you sleep at night?

Mike Conlan BS, DDS, MHA

Cc Governor Jay Inslee, Senator Patty Murray, Senator MariaCantwell, Heart of America NW, Hanford Challenge

From: Milo Namba
To: Hanford (ECY)
Subject: hanford
Date: Monday, January 06, 2014 8:15:14 PM

Mr. Steve Lowe
WA State Dept of Ecology
3100 Port of Benton Blvd
Richland, WA 99354

Dear Mr. Lowe,

It just does not seem to end. The delays. I still recall how Leslie Stahl from CBS 60 Minutes ran a story and then a follow up story for her network on Hanford. Her opinion about the clean up was not very pretty.

I hope you will take to heart the messages from many who will email you with their concerns. Decisions must be made looking at impact 100 years + to our environment, livability. Many citizens have died overseas since 2001 in an effort to protect our ability to live a healthy, happy life with great liberties. Let's not forget our response to their sacrifice. Let's do what is right to protect our west coast, United States, Earth and wellness of those on this Earth.

Thank you for your time.

Joyce Namba
Portland OR

From: Mitch Gould
To: Hanford (ECY); office@hoanw.org
Subject: Hanford Permit for Hazardous Waste
Date: Wednesday, January 01, 2014 8:34:11 PM

Dear Washington State Department of Ecology:

It is my understanding that the EPA wishes to impose restrictions on hazardous waste disposal at Hanford. As a resident of Portland, I absolutely must insist on the following provisions:

1. DOE should be required to remove and treat all illegally stored wastes within 3 years.

2. DOE must provide public hearings on any proposed changes to its permits for waste disposal. And these must be convenient to the citizens affected by Hanford.

3. DOE must notify the public that EPA wants to change DOE permits because DOE has been illegally storing and disposing of wastes. Such notice must explain the risks of the wastes that have leaked.

4. Hanford's new permit to dispose of waste must specifically bar the DOE from adding any more waste from offsite nuclear sources while existing wastes are illegally stored anywhere at Hanford.

Thank you,

Mitchell Santine Gould
7551 N Woolsey Ave
Portland
OR 97203

(503) 467-1347

From:	Ms Beech
To:	Hanford (ECY)
Cc:	Office (HOANW)
Subject:	Comment on USDOE's Proposed Changes to Hanford Hazardous Waste (RCRA) Permit for Central Waste Complex (CWC) and Low-Level Waste Burial Grounds Trenches 31 & 34
Date:	Thursday, January 02, 2014 10:52:48 AM

Dear Mr. Lowe,

This proposal fails to meet Washington state hazardous waste law ruleswhich require that “closure” plans have specific enforceable schedules on which progress can be evaluated. "Eventually" is not sufficient. I ask that the USDOE obey the law and protect the residents of the NW as fully and quickly as possible from the dangers facing them from leaking tanks.

The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat ALL illegally stored wastes within 3 years.

We need a schedule in writing.

We need public hearing and not just in the Tri-City area; citizens across the region are affected by this contamination and danger and deserve easy access to a hearing near their homes.

We need full disclosure in the public notice that makes clear that wastes have leaked and explain the risks of waiting (long-term storage) rather than dealing with the problem now.

We need for no more waste to be added to the site until existing waste stored at Hanford is taken care of according to the law.

Sincerely,
Sandy Polishuk
1610 NE Tillamook St., #3
Portland, OR 97212

From:	Nancy Ball
To:	Hanford (ECY)
Cc:	office@hoanw.org
Subject:	Hanford clean-up
Date:	Friday, January 03, 2014 7:52:09 PM

For decades we have been told that a deadline was set for the cleanup of radioactive wastes at Hanford, only to have the deadline broken, then set again, and broken, set again... Still the wastes have not been cleaned up, and some have been leaking. We must have a deadline set and enforced to provide closure for this decades-long problem of dangerous wastes at Hanford. These wastes are a threat to both our health and our environment--human and all other living things.

Furthermore, to allow the addition of more radioactive wastes at Hanford when we can't/don't clean up the wastes we already have, is morally wrong and irresponsible. This must not happen.

Nancy Ball
Walla Walla, WA 99362

From: Nancy Matela
To: Hanford (ECY)
Subject: Hanford waste and DOEs plan
Date: Monday, January 06, 2014 2:55:39 PM

I protest the proposed plan to clean up the Hanford waste! The law says any plan to deal with hazardous waste must have deadlines. The TriParty Agreement set out the big picture of deadlines. The DOE must comply with those and state specifically what it is going to do when within those deadlines set 25 years ago. We the residents of southeast Washington and down the Columbia River to the ocean demand that the government clean up our place where we and our children live, work and play.

Please address this lacking immediately!

Nancy Matela
Portland, Oregon

This email is free from viruses and malware because avast! Antivirus protection is active.

From:	Nancy Morris
To:	Hanford (ECY)
Subject:	Urgent comments on USDOE"s proposed changes to the Hanford Hazardous Waste Permit for the CWC
Date:	Monday, January 06, 2014 2:57:44 PM

Dear Steve Lowe:

Re: Proposed changes to the Hanford Hazardous Waste Permit for the CWC and low level waste burial grounds trenches 31 & 34.

It is imperative that citizens of Washington and Oregon have the right to comment on the new proposal by the USDOE, which will allow the USDOE to truck more radioactive waste to the Hanford Reservation and once again ignore a timely schedule of cleanup for the dangerously stored radioactive waste already at the Hanford Reservation. These hearings need to be held in densely populated cities such as Seattle, Spokane, and Portland, besides smaller cities like Richland. Failure to provide hearings gives the impression, apparently to Ecology and the USDOE, that no one cares. If no one knows what is going on, that is a good strategy to keep attendance down and outrage unvoiced.

After all the hundreds of comments given by people in 2012 regarding Hanford cleanup, it appears that Ecology plans to ignore these well thought out concerns and suggestions to follow the more dangerous and outrageous proposal from the USDOE. We need a timely and enforceable schedule of cleanup at Hanford with the necessary funding provided, which the USDOE proposal does not provide. No more delays and no more excuses.

To enumerate what needs to happen, please read the following and please honor the requests by the people of Washington and Oregon. What you decide this year will affect many thousands of people for generations to come:

1.The Hazardous Waste permit for the Central Waste Complex (CWC) must require the USDOE to remove and treat all illegally stored wastes within 3 years with a countdown from winter, 2014. Ecology needs to include a schedule for removing and treating the 68,000 drums of wastes currently stored illegally inside the CWC within 3 years along with a schedule for removing and treating all of the waste stored outside that area.

2. Public Hearings need to be held in major state cities, along with the tri-city area.

3. Full disclosure of permit changes that were ordered by the EPA due to the USDOE still illegally storing and disposing of wastes. This needs to include discussion that highly toxic waste has leaked and complete explanations of the risks for continued illegal storage to the Columbia River and the entirety of Washington and Oregon.

4. The Hanford RCRA permit should specifically bar USDOE from adding any more waste from offsite to TRENCHES 31 and 34, or any storage or disposal facility, while existing wastes are illegally store anywhere at the Hanford Reservation. If leakage from disposal trenches is projected to contaminate groundwater, this too will bar the USDOE from adding any more radioactive and/or toxic waste to these sites.

5. Hanford truly needs more monitoring and oversight from its own technical staff. These staff members should be protected from harassment and threats of losing their position should these staff members continue to report that the USDOE is illegally storing radioactive waste and not treating the leakage from tanks as the true emergency it is.

Regards,

Nancy Morris
PO Box 60096
Seattle, WA 98160
206-533-6155

From:	Pollet, Rep. Gerry
To:	Hanford (ECY)
Cc:	Office, (HOANW)
Subject:	RCRA permit mod comments Heart of AmericaNWRC
Date:	Monday, January 06, 2014 3:05:26 PM
Attachments:	Comments of HoANW, HoANWRC on USDOE"s proposed changes RCRA permit CWC, LLBG 1-6-14.docx

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Sent from my Verizon Wireless 4G LTE DROID

Heart of America Northwest
The Public's Voice for Hanford Cleanup
444 NE Ravenna Blvd. Suite 406 - Seattle, WA 98115 - phone: (206)382-1014 - web: www.hanfordcleanup.org

follow us on Facebook
Please send responses and questions to: office@hoanw.org and Gerry@hoanw.org

January 6, 2014

TO: Steve Lowe
Washington Department of Ecology
Submitted via Email to: Hanford@ecy.wa.gov

Comments of Heart of America Northwest and
Heart of America Northwest Research Center
on
USDOE's Proposed Modifications to the Hanford Site Hazardous Waste (RCRA) Permit for the Low-Level Burial Grounds Trenches 31, 34 and 94, the Central Waste Complex and Waste Receiving and Processing Facility (CWC-WRAP) and the T-Plant Complex (T-Plant)

USDOE was ordered by the US Environmental Protection Agency (EPA) to propose schedules to "close" the storage areas where large waste containers are illegally being stored outdoors at the "**Central Waste Complex**"; and, in storage areas at the "T-Plant." Additionally, there are 68,000 drums of illegally stored wastes inside the Central Waste Complex. As a result of illegal disposal of untreated radioactive – hazardous waste in Hanford's Low-Level Burial Ground trenches 31 and 34, EPA also ordered USDOE to cease illegal disposal practices.

The proposed changes to the hazardous waste law (RCRA) permit for these units are the result of years of illegally storing radioactive chemical wastes, some of which have leaked, and illegal disposal of hazardous wastes. However, the notice mailed by the Energy Department (USDOE) and Washington Dept. of Ecology failed to mention that the proposal is a response to a USEPA Order issued due to the violations of state and federal hazardous waste laws. EPA specifically ordered that USDOE submit plans for the legal "closure" of areas currently used to illegally store radioactive – hazardous wastes (called "mixed" wastes) within 120 days of the Order. Nor did the mailed Notice disclose the numerous leaks from the illegally stored containers – both indoors and outdoors.

When these illegally stored containers at Hanford's "Central Waste Complex" leaked, USDOE claimed the leakage was *just rainwater!!!*
Sampling of the leakage in 2012 found cadmium, chromium, lead, mercury and polychlorinated biphenyls (PCB's). Click for news coverage

Therefore, when Ecology issues any further proposals for modifying the permit for these units and facilities, and the results of its review of the USDOE's proposal, **we urge that the notice for comment and hearings should specifically include:**

1. **a summary of the EPA Findings of illegal storage;**
2. **a link to the EPA Findings and Order;**
3. **a summary of the history of violations of relevant state and federal hazardous waste laws at these facilities;**
4. **a concise and accurate summary of the relevant requirements for legal storage of hazardous wastes at units, including those that are no longer being used, and summarizing the relevant standards for "closure" of units**
5. **an EIS and summary disclosing the potentially very serious risks from continued storage of wastes at the out-of-door units which EPA ordered closed, T-Plant and LLBG storage and treatment units, as well as the illegal storage of an estimated 68,000 drums of waste inside Central Waste Complex sheds – with public comment taken at the same time (as required by SEPA, the state Environmental Policy Act) on the EIS and whether risks, impacts, potential alternatives and mitigation measures are adequate described and considered by Ecology; and,**
6. **that Ecology create a compliance history website page for each unit at Hanford to provide the public with easy access to the compliance history of the unit, including releases and inspection reports; and, that this be clearly linked in the notice for the renewed public comment period on CWC, WRAP, T-Plant and LLBGs.**
    a. **Ecology is urged to adopt an official policy that it will have a compliance web page for each unit available for the public to review when commenting on proposals for any unit**. It is inadequate to refer people to the unusable and unwieldy administrative record maintained by USDOE. Further, as this current notice illustrated, USDOE has demonstrated that it does not desire to provide easy public access to its compliance history for units undergoing public comment. Finally, HWMA rules (WAC Chapter 173-303) specify that Ecology must provide notice and access to the compliance history of sites undergoing comment for permit modifications. This cannot be delegated to USDOE.

USDOE's and Ecology's failure to disclose in the notice to the public for this comment period that the proposal is a requirement of an EPA Order issued due to existing violations is unconscionable and deprived the public of all meaningful notice.

We urge that EPA take official notice of both the failure to provide public notice of the violations, and of the multiple failures of USDOE's proposal to meet the minimum requirements for "closure" plans and issue an increased penalty to USDOE for these willful violations of the Order to USDOE. That Order specified that USDOE has 120 days to submit the "closure" plans. We describe in detail below how USDOE's proposed "closure" plans must be rejected by Ecology for failing to meet the minimum requirements for a closure plan pursuant to WAC 173-303-610.

Further, EPA reduced the penalty due to claims that USDOE recognized the violations and was agreeing to take corrective action to address them.

Failing to disclose the existence of violations to the public in public notice, and failing to submit a minimally adequate set of closure plans does not indicate a violator is cooperating and understands that it has engaged in serious violations of hazardous waste laws, with potentially deadly consequences.

All notice to the public that the proposal was the result of illegal storage and disposal of wastes, summaries of closure plan requirements and the history of violations at the units, and the subsequent generation of public comments is due solely to the work of our organization and cooperation with the Yakama Nation in evaluating the proposal.

Therefore, **we urge that Ecology and EPA both jointly and individually find: a) that the USDOE failed to submit legally adequate "closure" plans; and, b) that USDOE failed to provide notice to the public that the genesis of the proposal was due to EPA Findings of serious legal violations.**
As a result of these Findings, we urge that EPA and Ecology issue a new penalty to USDOE equal to the amount of the initial penalty, and that the funds from this penalty be agreed to be applied to a supplemental environmental project to provide public notice and analyses via affected Tribal Nations and citizen groups (which USDOE has either reduced funding for oversight from, or refused to provide renewed public participation grant support for) (while EPA penalties may not be utilized for a supplemental environmental project, Ecology may order such use of funds from a penalty; and, both agencies may negotiate that the equivalent amount of a proposed penalty be used for future notice and participation projects).

We also urge EPA to formally issue an order barring USDOE from adding off-site waste to the CWC, LLBG and other units at Hanford pursuant to its authority and duties under the federal Superfund law's (CERCLA) "offsite waste rule:"

The Offsite Waste Rule bars disposal of cleanup waste from one Superfund site or federal facility at another Superfund Site (e.g., Hanford) where:

a) the landfills ("receiving units") at the second site (Hanford) are releasing hazardous substances to the environment or have relevant violations ("significant deviations" from permit conditions, regulations or compliance orders – 40 CFR 300.440(b)).

b) Other units at the site (Hanford) have releases of hazardous substances which are not "controlled". CERCLA 121(d)(3), 42 USC 9621(d).

Under the federal superfund statute, a unit, or burial ground, at a facility, such as the Hanford Reservation, may only receive off-site waste if the facility is operating in compliance with relevant federal and state law. CERCLA 121(d)(3), 42 U.S.C.A. § 9621(d)(3). To satisfy this standard, the unit must not be releasing any waste *and* any releases at units elsewhere in the facility must be controlled by a corrective action program. CERCLA 121(d)(3), 42 U.S.C.A. § 9621(d)(3).

EPA and Ecology have formally found that wastes are illegally stored at CWC, there are uncontrolled releases at CWC and the LLBGs, storage at CWC fails to meet relevant hazardous waste law standards, the LLBGs lack legally required monitoring, and that USDOE illegally disposed of land disposal restricted hazardous wastes without treatment at the LLBGs (and this was not the first such finding of illegal disposal). None of these conditions are proposed to be cured within the legally maximum timeframes, e.g., WAC 173-303-610 requires removal of wastes and closure within 180 days. Indeed, none of these conditions are proposed to be cured within any enforceable timeframe in the coming decade.

Therefore, EPA has a duty to bar disposal of offsite wastes at these units and any other units at Hanford pursuant to CERCLA 121(d)(3), 42 USC 9621(d), and 40 CFR 300.440(b).

Ecology has a duty pursuant to SEPA, HWMA and State policy, based on both the violations and the analyses in USDOE's own Tank Closure and Waste Management EIS regarding offsite waste disposal resulting in landfill releases above relevant standards for protection of groundwater to issue a specific permit condition barring offsite waste from CWC, the LLBGs and from ALL other units at Hanford, until such time as all violations for storing hazardous wastes are cured, land disposal restrictions are met, and (for disposal) barring disposal in any unit if the cumulative impacts from disposal and closure units will violate MTCA or groundwater protection standards

Ecology Must Reject the Proposed Modification as Failing to Meet the Minimum Requirements for Closure Plans:

EPA ordered USDOE to submit closure plans for these units, e.g. the outdoor storage areas at CWC, within 120 days. By definition, EPA's Order required USDOE to submit a legally minimally compliant "closure" plan. WAC 173-303-610 lays out clear requirements for a closure plan, which include a timeline for closure which is enforceable and which is specific enough to allow the regulator and public to hold the permit holder accountable for progress. In no event may closure exceed 180 days.

***USDOE's submittal, however, FAILS to include timelines or enforceable schedules to remove and treat the wastes*.**

Hundreds of people submitted comments to Ecology in 2012 on the Hanford hazardous waste permit urging that ALL illegally stored wastes should be removed from the Central Waste Complex and treated within three years.

Ecology withdrew those proposed permit changes and is now considering – separately – USDOE's new proposal.

USDOE's proposal does NOT INCLUDE ANY SCHEDULE for removing and treating the wastes, other than acknowledging a general Tri-Party Agreement deadline for removal by 2030. State and federal hazardous waste law rules require "closure" plans to

have specific schedules to allow tracking of progress, with complete removal of wastes in 180 days!

Ecology should reject USDOE's closure proposal as legally inadequate.

Ecology should impose an enforceable schedule for removing and treating all illegally stored wastes at CWC – not just the outdoor areas – within three years. If Ecology had done so as urged by our organizations and hundreds of people in the 2012 comment period on the proposed (now withdrawn) RCRA permit renewal, we would be more than a third of the way to having the wastes removed and treated.

A three year schedule provides USDOE with far more leeway than it has reason to be afforded, including adequate time to reprogram and request funds. Commercial treatment for the mixed wastes is available (at Perma-Fix) – this has never been in question - for the vast majority of the wastes. For the illegally stored Remote-Handled TRU mixed wastes, USDOE has had years of notice to obtain treatment or ship the waste to WIPP for disposal.

Inside the Central Waste Complex in April 2011 a large puddle was found from drums which were legally supposed to be "dry" waste without liquids.

The puddle included both chemicals and Plutonium at levels measuring 1.2 million disintegrations per minute (DPM). Waste which leaked from the "dry" container exposed a worker at levels of 3,205 dpm. The leak was in 240-WB from a drum removed from the Central Waste Complex. This was one of three such leaks in a year.

The wastes have been illegally stored for 18 years without a permit.

Federal and state laws forbid storing wastes which are not dry, and require that wastes be removed from storage to be treated within a year.

Wastes, including the drum which leaked in April, 2011, have been improperly misidentified as "debris". "Debris means solid material," as EPA summarizes the law.

The lack of a permit is only the tip of the iceberg. *The wastes are stored without knowing what they are composed of* and were misidentified (e.g., claiming they were dry "debris").

The explosion which lifted the roof off, and harmed 12 workers at, the Plutonium Finishing Plant in 1997 was caused by a similar violation: USDOE failed to remove hazardous wastes within a year as the law requires.

The risks from illegally storing mixed radioactive and chemical wastes are incredibly high. Corrosion can mix chemicals that explode or ignite, or the chemicals can self-concentrate and explode. This is what happened with illegally stored wastes at Hanford's Plutonium Finishing Plant in 1997. It's important to enforce our state and

federal hazardous waste laws, including those that bar long-term improper waste storage.

For any proposal which contemplates continued storage of uncharacterized or otherwise illegally stored wastes beyond 180 days, Ecology MUST prepare an Environmental Impact Statement (EIS) which considers the risks and impacts from prolonged storage, along with mitigation strategies, descriptions of available treatments or treatment limitations, and take public comment on the SEPA review at the same time it issues the proposal for permit modification.

Low-Level Burial Grounds Need Closure with Monitoring – covering the entire LLBGs, not just Trenches 31 and 34 or "islands" where USDOE admits disposing of waste illegally since 1987:

What do 43 miles of unlined trenches filled fifty feet deep with radioactive and chemical wastes look like?

Picture Interstate 5 from Seattle to Marysville or Portland to Salem, as a ditch three lanes wide filled with radioactive and chemical wastes.

It is irresponsible to just cover that with dirt, rather than exhume and treat the wastes. Trenches 31 and 34 of Hanford's Low-Level Burial Grounds are the only portions of the 43 miles of trenches comprising Hanford's "burial grounds" that are lined.

Since the 1970's, federal and state hazardous waste laws barred dumping garbage or hazardous wastes in unlined trenches.

USDOE never obtained hazardous waste law (RCRA) permits for Trenches 31 and 34. In its June 2013 Order, EPA documented that USDOE had illegally buried "high temperature gas reactor" and other drums of mixed chemical and radioactive wastes in the trenches without treatment.

In 2012, USDOE's proposal for the Hanford RCRA permit and TCWMEIS called for almost all of the unlined burial grounds to be covered rather than exhumed and the waste treated. USDOE's proposal is a 'cover-up', not cleanup. The recent violations illustrate why the permit should require exhuming and treating wastes from all 43 miles of trenches.

USDOE asserts that Trenches 31 and 34 of the LLBGs and CWC have "interim" status under RCRA and state hazardous waste law (HWMA).

This is ludicrous!

Interim status was only available for a limited time for units with hazardous waste in existence when RCRA was enacted.

CWC and the trenches were constructed and opened without permit applications decades after RCRA was enacted. Interim status was never applicable. These units were opened illegally, and continue to be illegally used to store or dispose of waste. Therefore, Ecology has no option other than to follow the law and Ecology's mandatory duty to order the removal of all wastes from CWC and closure of both sets of units on an enforceable schedule.

We also note, with great irony, that even if interim status had been applicable, interim status expired for all units in the nation many years ago. But, in addition, it was automatically revoked for any unit in violation of standards. EPA has formally found that these units are in violation – setting in motion this proposal. Thus, interim status and its standards may not be cited or relied upon.

USDOE Deliberately Failed to Disclose Vital Information for the Public To Comment and Ecology Failed to Require Proper Notice to Enable the Public to Comment – This Must be Changed:

The notice sent to the public of these proposed changes to the Hanford hazardous waste permit, and **one** public meeting to be held in Richland, was developed by the federal Energy Department and approved and mailed by WA Ecology.

The notice's failure to disclose that the proposal is the result of a finding and Order by EPA that USDOE was illegally storing wastes, and illegally disposed of wastes in the burial grounds, is an example of how bad notices are for Hanford cleanup.

Just from reading the notice, no one would likely be motivated to comment or go to a meeting, since it failed to disclose the dangerous and illegal conditions, or that hundreds of people had commented just two years ago urging that Ecology impose a three year schedule to remove all untreated wastes from the Central Waste Complex.

Public Involvement Survey by HoANW:
The notice from USDOE and Ecology came just as we were designing a new survey with UW students for improving Hanford Clean-Up notices and public meetings. The notice included a single public meeting to be held in Richland in December.

We developed a survey which included testing if the public would even notice or read the official mailing and email for this comment period, and then ask if people would have opened and read the notice, or attend a meeting, if they knew that the facilities for which the permit was being modified contained thousands of illegally stored dangerous containers of waste.

Unsurprisingly, the only "public" at USDOE's public meeting in Richland was staff from public interest groups and tribes.

74% of the 193 respondents to our survey said USDOE's notice did not give enough information to enable them to comment on this current proposal!

However, in our survey, after disclosing that the facilities were illegally storing large quantities of wastes and that there was no proposed schedule for removing wastes, an incredible 87% of people on the official agency notice list and our list of recent hearing attendees said they would try to go to a public meeting – if one was held near them.

Heart of America NW is asking for new public meetings across the region, with new notices that fully disclose key facts, when Ecology has to hold another public comment period on Ecology's response in 2014.

Public Involvement Survey by HoANW:
The notice from USDOE and Ecology came just as we were designing a new survey with UW students for improving Hanford Clean-Up notices and public meetings. The notice included a single public meeting to be held in

Summary of comments:

1. The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat ALL illegally stored wastes within 3 years. Ecology should include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

State hazardous waste law rules require that "closure" plans have specific enforceable schedules on which progress can be evaluated (WAC 173-303-610). USDOE's proposal fails to meet this standard. Instead, USDOE's proposed 'closure" plan merely says that eventually the wastes will be removed in keeping with a general deadline of the year 2030 in the Tri-Party Agreement. The rules also require that wastes be removed for treatment in under a year.

For these illegally stored wastes, commercial treatment of the hazardous wastes with which they are mixed, is available at the Perma-Fix NW treatment facility adjoining Hanford. USDOE has failed to ask Congress to fund removal and treatment. If included in the permit, USDOE will be required to ask Congress for the funding to meet the closure plan schedule.

2. Ecology must hold public hearings across the region on the proposed changes, including honoring the requests of 190 people who responded to our public involvement survey that they want a hearing near them, based on learning of the violations and ongoing illegal storage of wastes which triggered this set of proposed permit modifications.

3. The public notice for the next round of review, comment and hearings must fully disclose that these permit changes were ordered by EPA due to USDOE illegally storing and disposing of wastes.
The notice should disclose that wastes have leaked and explain the risks of prolonged storage, which must be accompani9ed by an EIS pursuant to SEPA.
Ecology should set up easily publicly accessible websites with the compliance / violation and release history of all units, starting with these units when notice is sent out for commenting on permit modifications relating to the units.

4. The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford, e.g. CWC; and, if leakage from disposal trenches is projected to contaminate groundwater. Ecology and EPA should each issue specific orders barring all offsite waste from units at Hanford, consistent with the CERCLA offsite waste rule and its standards.

From:	Richard Hernandez
To:	Hanford (ECY)
Cc:	office@hoanw.org
Subject:	Comments on USDOE's proposed changes to Hanford Hazardous Waste (RCRA) Permit for Central Waste Complex (CWC) and Low-Level Waste Burial Grounds Trenches 31 & 34
Date:	Friday, January 03, 2014 6:30:21 PM

To:

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

Email: Hanford@ecy.wa.gov

Mr. Lowe,

Below are my comments on USDOE's proposed changes to Hanford Hazardous Waste (RCRA) Permit for Central Waste Complex (CWC) and Low-Level Waste Burial Grounds Trenches 31 & 34:

1. The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat ALL illegally stored wastes within 3 years. I believe the Washington State Dept of Ecology should include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

2. **Public hearings** need to be held across the region on the proposed changes, including a hearings here in Kirkland/Eastside.

3. The public notice for the next round of review, comment and hearings must fully disclose that these permit changes were ordered by EPA due to USDOE illegally storing and disposing of wastes. The notice should also disclose that wastes have leaked and explain the risks of prolonged storage.

4. The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal

facility, while existing wastes are illegally stored anywhere at Hanford; and, if leakage from disposal trenches is projected to contaminate groundwater.

I hope you will seriously consider my comments.

Thank you.

Richard Hernandez
14304 110th Ave. NE
Kirkland, WA 98034

425-286-6450 home
425-492-6885 mobile
ardenlord@mac.com (home)

From:	Robin B
To:	Hanford (ECY)
Subject:	Proposed Changes to Hanford's Hazardous Waste Permit for Central Waste Complex and Low-Level Waste Burial Grounds Trenches 31 & 34
Date:	Saturday, January 04, 2014 10:50:33 PM

Attn: Steve Lowe

Washington State Dept of Ecology

3100 Port of Benton Blvd

Richland, WA. 99354

Re: USDOE's Proposed Changes to Hanford's Hazardous Waste Permit for Central Waste Complex and Low-Level Waste Burial Grounds Trenches 31 & 34

The proposed permit should REQUIRE USDOE to remove and treat ALL illegally stored wastes, within 3 years. This process has dragged on for far too long.

It should include a schedule for removal and treatment of the 68,000 drums of wastes stored inside CWC within the same time period, as well as a schedule to do the same with all the wastes stored outside of it!

Ecology should make sure to have well publicized public hearings about the proposed changes in the permit, in all the affected cities in the region, including here in Eugene, where I live.

The public hearing notices should note that wastes have leaked, and should explain what the risks of prolonged storage of these wastes will mean to the public.

Thank you,

Robin Bloomgarden

1430 Willamette st, #493

Eugene, OR 19401

From: Steven Hartholz
To: Hanford (ECY)
Cc: office@hoanw.org
Subject: Clean Up Hanford NOW
Date: Sunday, December 29, 2013 6:46:41 PM

State hazardous waste law rules require that "closure" plans have specific enforceable schedules on which progress can be evaluated (WAC 173-303-610). USDOE's proposal fails to meet this standard. Instead, USDOE's proposed "closure" plan merely says that eventually the wastes will be removed in keeping with a general deadline of the year 2030 in the Tri-Party Agreement. The rules also require that wastes be removed for treatment in under a year.

For these illegally stored wastes, commercial treatment of the hazardous wastes with which they are mixed, is available at the Perma-Fix NW treatment facility adjoining Hanford. USDOE has failed to ask Congress to fund removal and treatment. If included in the permit, USDOE will be required to ask Congress for the funding to meet the closure plan schedule.

Why didn't the notice sent by USDOE and Washington Ecology disclose that the proposal is the result of an EPA Order due to USDOE's illegal storage and disposal of wastes?

I am asking the DOE and the Washington State Department of Ecology to obtain funding and clean up all nuclear waste from Hanford, in accordance with Federal Statute.

Steven B. Hartholz
615 12th Ave East
Apt 303
Seattle, WA 98102
Tel. (206) 324-7197
Cell # (206) 755-5082
Fax (206) 770-7239

From: Theresa DiPasquale
To: Hanford (ECY)
Cc: office@hoanw.org
Subject: Inland Northwest Residents Deserve Better!
Date: Friday, January 03, 2014 10:27:15 AM

To the Washington State Department of Ecology:

As a resident of Walla Walla and an environmentally-aware US citizen, I am deeply concerned about the USDOE's plans for Hanford. How can the state even consider allowing that plan to go forward? The health consequences to Washington and Oregon residents will be felt for generations to come! Anyone who cares about the future of our region must insist upon a number of key measures:

1. The Hanford hazardous waste permit for the CWC must require the USDOE to remove and treat all illegally stored wastes within 3 years, including all of the waste currently stored inside the CWC and all the waste stored outside. The three-year schedule should be clearly mapped out now by the state Department of Ecology.

2. Any proposed changes in the current rules for waste cleanup at Hanford should be discussed in well-advertised public hearings in all affected communities, including the Tri-Cities, Walla Walla, and Spokane. The announcements publicizing these hearings must explain to the citizens that the EPA has ordered permit changes because the USDOE was illegally storing and disposing of waste, that this waste has been leaking, and that long term storage of this waste poses serious risks to the environment and population of the entire region.

3. The Hanford RCRA permit must specifically bar the USDOE from adding ANY MORE hazardous waste from off site to trenches 31 and 34 or any other disposal facility at Hanford as long as existing waste at Hanford is illegally stored anywhere on the site, and as long as leakage from the site is projected to contaminate ground water.

Sincerely,

Theresa M. DiPasquale
Walla Walla, WA 99362

From: Tim Shinabarger
To: Hanford (ECY)
Subject: Proposed changes to Hanford hazardous waste permit
Date: Thursday, January 02, 2014 9:41:35 PM

Attn: Steve Lowe
Washington State Department of Ecology

Mr. Lowe and associates:

As a resident of the Pacific Northwest whose daughter and son-in-law work as emergency responders, I am concerned about the proposal to amend the Hanford hazardous waste permit to allow the U.S. Department of Energy to ship more radioactive waste to Hanford. Our home city of Eugene, Oregon is on Interstate 5 and thus on one of the routes by which hazardous radioactive waste would be shipped to Hanford. In the event of a shipping accident in this region, as first responders my family members would face risk of radioactive contamination to carry out their community function to protect the resident population.

Rather than ship more radioactive wastes to the Hanford complex, the Department of Energy needs to remove and treat the wastes illegally stored there now. We know they are leaking and pose health risks to the local community. The DOE needs to establish a schedule to do so in accordance with state and federal hazardous waste regulations. The DOE proposed closure plan is not specific; the agency should remove and treat said wastes within three years of plan approval.

Your agency is responsible not only to residents of the State of Washington but also the entire Pacific Northwest population. Considering the health risks additional radioactive waste shipping would pose to the region, the one public meeting held regarding this issue is inadequate. I call on you to order additional public hearings in the region's major cities of Portland, Spokane and Seattle, and, if possible, in Eugene.

Sincerely,

Timothy Shinabarger
tim.shinabarger@comcast net
P.O. Box 12, Eugene, OR 97440
(541) 510-3679

From:	Trina Sherwood
To:	Hanford (ECY)
Cc:	Jean Vanni; Rebecca Jamison; Marlene George; Al Ramos; Russell Jim
Subject:	FORWARDING ATTACHMENT
Date:	Monday, January 06, 2014 2:41:54 PM
Attachments:	01.06.2014-ERWM doc-R. Jim to K. Ballinger-S. Lowe, re Rev-Class 3 Mod-RCRA Permit-LL Burial Gr. Trenches 31,34,94...T-Plant Complex.pdf
Importance:	High

Mr. Steve Lowe:

I am forwarding this PDF attachment to be entered into record. Thank you.

Mr. Russell Jim-Projects Manager
Environmental Restoration/Waste Management Program
Yakama Nation
P.O. Box 151
Toppenish, WA 98948
(509) 452-2502, ext. 1001

By Trina D. Sherwood
ER/WM Office Assistant IV

Confederated Tribes and Bands
of the Yakama Nation ERWM

Established by the
Treaty of June 9, 1855

January 6, 2014

Kim Ballinger
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, A7-75
Richland, WA 99352

Steve Lowe
Washington Department of Ecology
3100 Port of Benton Blvd
Richland WA 99354

Subject: Review of Class 3 Modifications to the Hanford Site RCRA Permit for the Low-Level Burial Grounds Trenches 31, 34 and 94, the Central Waste Complex and Waste Receiving and Processing Facility (CWC-WRAP) and the T-Plant Complex (T-Plant).

Dear Ms. Ballinger and Mr. Lowe:

The Confederated Tribes and Bands of the Yakama Nation is a federally recognized sovereign pursuant of the Treaty of June 9, 1855 made with the United States of America (12 Stat. 951). The U.S. Department of Energy Hanford site was developed on land ceded by the Yakama Nation under the 1855 Treaty with the United States. The Yakama Nation retains reserved rights to this land under the Treaty.

These modifications to the Hanford RCRA Permit Rev. 8C are in part the result of actions required by the Consent Agreement and Final Order (CAFO-No. RCRA-10-2013-0113) executed by the U.S. Department of Energy (DOE) and the U.S. Environmental Protection Agency (EPA) dated June 26, 2013. The Confederated Tribes and Bands of the Yakama Nation appreciate the opportunity to review and provide comments on these documents.

We look forward to discussing our concerns.

Sincerely,

Russell Jim
Yakama Nation ERWM Program Manager

cc:
Matt McCormick, Manager, US Department of Energy
Jane Hedges, Washington State Department of Ecology
Ken Niles, Oregon Department of Energy
Stuart Harris, CTUIR
Gab Bohnee, Nez Perce

Marlene George, YN ERWM
Administrative Record

Attachment:
Note these comments do not reflect a detailed description of all our concerns.

Attachment 1: Major Concerns:

Interim Status Standards & the RCRA Permit:

1. Ecology has stated "Prior to the issuance of the permit in 1994, Hanford Site TSD units operated under interim status—a status provided for under RCRA, which grants a Facility the right to continue to operate in accordance with applicable RCRA or state regulations until a RCRA final status permit is issued. Any TSD unit not included in the initial Permit, which became effective in 1994, was to be incorporated through a permit modification process (a change control process defined in WAC 173-303-830). This process was initiated by the submittal of a Part B permit application, closure plan, closure/post-closure plan, and/or post-closure permit application in accordance with WAC 173-303-610, -803, -806.The TSD units not yet incorporated into the original Permit were to continue to operate under interim status requirements WAC 173-303-400." **All modification documents support DOE's continued RCRA operations under Interim Status Standards despite violations of WAC 173-303-400 and -805 requirements.**

   However, under EPA/DOE Consent Agreement and Final Order (CAFO-No RCRA-10-2013-0113), DOE was charged with failure to comply with Land Disposal Restriction [WAC 173-303-140] at the Low-level Burial Grounds Trenches 34. This is a clear violation of the Interim Status standards of WAC 173-303-400(3)(i) and the WAC 173-303-805 requirements. **All operations for all Hanford site units operating under interim status standards should cease immediately and until such time they are fully permitted under WAC 173-303-806, including for closure of the CWC, T-Plant and LLBG storage areas as required pursuant to the EPA Order. Continued operations under interim status standards should be subject to RCRA final status permit requirement violation penalties.**

   Furthermore, we request Ecology <u>bar</u> any offsite waste shipments to CWC and/or LLBG. We request EPA to also <u>bar</u> any offsite waste shipments to the Hanford site CWC and LLBG facilities under the CERCLA offsite waste rules [40 CFR 300.440(a)] due to these substantial violations.

2. While the documents are intended for the purpose of closure of illegal TSD units, they also list other storage and/or treatment DWMUs which are or could be by the public, considered to be permitted facility units. **This list of units should not be construed to be compliant with WAC 173-303-container/containment building/storage area/tank/miscellaneous unit regulations.**

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3. No Sections on Container Receipt and Inspection and non-acceptable waste shipment within the Inspection or Closure Plans rendering these documents incomplete.

Personnel Training Plans:

1. Documents are structured to reflect only training for personnel dealing with sub-units which are closing and deemed to be with or without having any dangerous waste present. Unless there are different training plans [i.e., operating units] then this plan should be structured to reflect both closing units and operational units to comply with WAC 173-303-330 requirements.

2. Rev 8C Permit Attachment 5 is stated as describing the specific requirements of the personnel training program, but is not available for public review. Attachment 5 may not be sufficient and also require revision.

3. The statement "The SWOC Closure Units Dangerous Waste Training Plan (DWTP) provides a complete description of the personnel training requirements" is misleading. This Addendum is the Personnel Training Plan. Alone, it does <u>not</u> fulfill compliance with WAC 173-303-330(2)(a) and (b).

4. Misleading statements are made which support the premise that what is designated on the Part A form reflects permit conditions (e.g., "The LLBG Trench 31-34-94 closure unit where dangerous waste containers are no longer present is FS-1" and " The Permittees will comply with the following training matrix, which provides training requirements for Hanford Facility personnel associated with the Solid Waste Operations Complex (SWOC) Central Waste Complex Waste Receiving and Processing Plant (CWC-WRAP) closures.") **This falsely states the premise that only these three trenches are the LLBG and that that CWC & WRAP have authority to be designated as one facility.)**

5. Training matrix tables do not include all necessary personnel (e.gs. Building Emergency Director, Regulatory Compliance [unless that position is included in the ECO position], groundwater samplers). The Operations Supervisor should be trained in all areas. Additional trainings should be required for other listed personnel as well.

6. Additional trainings for surveillance personnel [including inspectors and groundwater samplers] should be required.

Closure Plans:

1. **Scrutiny of Closure Plans show there is nothing in them which compel DOE to do work now** (i.e., There is nothing in these Closure Plans [including in descriptive/informational sections] which compel to have a schedule to remove, treat and dispose of all illegally stored wastes at CWC**).**

   The proposed schedule and listing of Tri-Party Milestones [acknowledging a general TPA agreement for removal by 2030] does not fulfill WAC 173-303-610 requirements to have a detailed, complete closure plan to include a specific detailed closure activity schedule with complete removal of wastes in 180 days. The TPA schedule is even beyond the next Permit re-application cycle. DOE is not in compliance with EPA's CAFO-No RCRA-10-2013-0113 to submit complete closure plans per WAC 173-303-610 requirement. There are no details included which provide for the monitoring [or characterization] for the decades of proposed storage. Permitted treatment facilities [e.g., Perma Fix] are available; there is no justifiable defense for non compliance with WAC 173-303-610.

   Furthermore, operational history at these sites does not substantiate DOE's claim to have demonstrated it has (or will) take steps to prevent threats to human health and the environment including compliance requirements [WAC 173-303-110, -200, -310, -320, -330, -340, -360, and -380]. [231ZDR-11 container noted in Outside Storage Area A (Area A) closure plan as *an area of interest* & Ecology letter 12-NWP-039]. Removal is urgently needed before there is another leak, fire or explosion.

2. **Clarification is also requested as to what basis Ecology has to authorize continued management of wastes in a dangerous waste management that has already failed or is so poorly managed so as to result in releases to soils and the environment or has violated WAC 173-303-400 [see CAFO-No RCRA-10-2013-0113].** Another example is in the case of the floor of Room 152; it is sealed concrete that does not provide secondary containment. Dangerous waste containers meeting the criteria specified in WAC 173-303-630(7)(c) are stored on standard pallets to ensure elevation off of the concrete floor. Dangerous waste packages not meeting the criteria specified in WAC 173-303-630(7)(c) (e.g., waste package containing free liquids) are placed on portable spill containment equipment such as spill pallets meeting the criteria specified in WAC 173-303-630(7)(a)and (b). WAC 173-303-6307(c) bars free liquid storage in noncompliant facility storage.

3. Erroneous statements that approval of Closure Plans will grant the Hanford Site an extended closure period in accordance with WAC 173-303-610(4)(c) without any modification requests being submitted to Ecology. Any subsequent changes to the approved closure plan or schedule require a permit modification in accordance with WAC 173-303-830/-840.

4. Closure plans must comply with the WAC 173-303-610 requirements; closure plans do not 'simply represent a baseline for closure' as stated. WAC 173-303-610(3)(iv thru vi) requires more information and details which are not included in these Closure Plans.

- Lacking detailed descriptions of steps needed to remove or decontaminate all dangerous waste residues and contaminated containment system components, equipment, structures and soils, including methods for sampling and testing of surrounding soils and criteria for determining the extent of decontamination required to satisfy the closure performance standards.
- Lacking details of compliance with WAC 173-303-630 & WAC73-303-695 requirements. [e.g., The current LLBG container storage pads are not in compliance with WAC 173-303-630 requirements [and a discrepant container does not meet LDR standards for placement on these pads]; Sections of 221-T Building have been designated as a Containment Buildings [221-T Railroad Tunnel, 221-T Canyon Deck, and selected 221-T Cells (7L, 13R, 17R).]
- Lacking details of compliance with WAC 173-303-640(6). [E.g., Given that wastes remain in some tanks (see Part A form text cited above), the tanks continue to actively manage wastes, and they must continue to follow applicable tank requirements at least until removal of waste has been completed, if not until certification of completion of closure has been submitted to Ecology. Tank inspections shall include inspection of overfill controls, aboveground indications of corrosion or release of wastes, data gathered from monitoring any leak detection equipment, the construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system to detect erosion or signs of releases of dangerous wastes. Tank inspection shall include inspection of cathodic protection systems, if present.]
- Lacking details of compliance with WAC 173-303-680(2). [E.g., Miscellaneous unit]
- Lacking details of how compliance with WAC 173-303-140(2) will be met prior to storage or disposal.
- Lacking details of compliance with the requirements of and 40 CFR 264.1101(c)(4) [incorporated by reference at WAC 173-303-695]. [E.g., Containment building].
- Lacking following text to ensure public involvement opportunities: Any updates to SAP shall be through the permit modification process in accordance with WAC 173-303-830/840.
- Lacking following (or similar) text to ensure prevention of soil and groundwater contamination: Clean closure of the soil under the CWC structures and modules will be accomplished by demonstrating that the coated concrete floors kept contamination from reaching the soil. The coated concrete floors provided secondary containment for the storage and treatment areas of CWC. Unless inspections identify potential through-thickness cracks indicating containment failure and a subsequent for potential soil contamination from the TSD unit operations, the soil will be considered clean closed. Should inspections identify such cracks, potential soil and groundwater contamination will be investigated as an unexpected event during closure. In this circumstance, a sampling and analysis plan for characterizing the nature and extent of soil contamination will be prepared following the completion of a data quality objectives process in accordance with EPA/600/R-96/055 (QA/G-4), *Data Quality Objectives Process,* as amended. The data quality objectives process will be initiated prior to closure on a schedule to ensure timely closure of CWC. The sampling and analysis plan will be submitted to Ecology as part of a permit modification request in accordance with WAC 173-303-830. This permit modification request will also establish constituents of concern, soil

remediation requirements, soil closure performance standards, and associated sampling, analysis, and QA/QC requirements necessary to demonstrate compliance with closure performance standards. The sampling and analysis plan will be prepared consistent with EPA/240-B-01/003 (EPA/QA R-5), *EPA Requirements for Quality Assurance Project Plans*, as amended.

- Lacking consistency in requirements for IQRPE actions.
- Lacking consistency in requirements for decontamination per WAC 173-303.
- Lacking consistency in requirements for removal of and disposal of contaminated media [including rinsate].
- Lacking consistency in designation of dangerous and/or mixed waste provisions of WAC 173-303.
- Lacking consistency between closure plan tables and Part A tables and/or area dimensions/volumes.
- Lacking (in some instances) evaluations of compliance with [WAC 173-303-630(4), - (7), Subpart CC control standards (40 CFR 264.1084 - 264.1086), and Ecology Publication ##09-05-007 [Guidance for Preparing Waste Sampling and Analysis Documents and QA/QC Requirements at Nuclear Waste Sites.
- Lacking (in some instances) the estimated maximum waste inventory; WAC 173-303-610(9) & (10) discussions; and Post-Closure Care -610(7) & (8) discussions.
- Lacking section on Container Receipt and Inspection and non-acceptable waste shipment within the Inspection or Closure Plans.
- Including statements regarding clean closure determinations by DOE which are under Ecology's authority [e.g., Allowing concrete floorings to remain in place; Some closure units will remain in "as is" state citing nearby operating DWMU when in reality, information presented in figures do not support claims to not need to comply with clean closure standards of WAC 173-303-610(2). Closuring units which are easily and safely accessible should not delay or defer required closure actions subject to TPA Milestones.
- Including statements not in compliance with WAC 173-303-830 requirements (e.g., "Subsequent changes to the closure schedule will not require a permit modification and a separate extension request will not be filled".)
- Inconsistent format between similar documents.

5. Clarification is needed to differentiate between closure performance standards for soils, groundwater, surface water, and air, subject to -610(2)(b)(i) and <u>which are not</u> being established in this closure plan, and -610(2)(b)(ii), which are established by Ecology. Closure Performance standards for structures are to be set by Ecology on a case by case basis.

1. **SAPs: Sampling and analysis for exceedence of MTCA Method B standards <u>do not require</u> following the *observational approach* and unfiltered sampling for SAPs. Additional soil removal and re-sampling until these standards are not exceeded is not required and should be. The following are requested to be included in all SAPs:**
    - Employment of a 'methods based approach' to all sampling, provide all suite analysis results, and evaluate data to ensure verification sampling demonstrates no exceedances of unrestricted numerical cleanup levels <u>should also be a requirement</u> of the clean closure determination process. Use of the 'judgmental sampling' approach should be limited and in no way substitute for the required a statistical approach. Discrete samples should target the most likely to be highest site of contamination.

- Verification soil sampling performed during closure activities must demonstrate that any residual dangerous wastes, dangerous waste constituents, and/or residues do not exceed the unrestricted numerical clean ups levels in accordance with the Model Toxics Control Act (MTCA) regulations calculated according to MTCA Method B (2007, as amended).
- The Sampling and Analysis Plans to have consistency with Ecology Publication #09-05-007 Guidance for Preparing Waste Sampling and Analysis Documents and QA/QC Requirements at Nuclear Waste Sites.
- Methods are not discussed. Steps are conceptual rather than defined as required.

  Associated issue: The Sampling and Analysis Plans (and Waste Analysis Plans) and criteria for waste acceptance at the LLBG should be informed by the results of the Risk Budget Tool.

2. Some closure units will remain in "as is" state citing nearby operating DWMU when in reality, information presented in figures do not support claims to not need to comply with clean closure standards of WAC 173-303-610(2**). Closuring units which are easily and safely accessible should not delay or defer required closure actions subject to TPA Milestones.**

Related Issue: Factsheet and public hearings:

The Factsheet provided to the public did not fully disclose DOE violations and the content of the EPA Consent Agreement and Final Order (CAFO-No RCRA-10-2013-0113). This does not comply with the requirements of WAC 173-303-830(4)(c)(iii) to have supporting documents available, etc. The YN ERWM program requests a new public involvement comment period including public hearings around the region with full discussions of the following:

- EPA Consent Agreement and Final Order (CAFO-No RCRA-10-2013-0113).
- Closure schedule for removal and treatment of illegally stored wastes and how it complies with WAC 173-303-610(4) and the CERCLA offsite waste rule and relevant standards
- DOE's SEPA checklist submittal for this permitting action.
- Unit operations under interim status standards and Ecology's obligations under WAC 173-303-400(3)(i) and 173-303-805(8)(d)

Confederated Tribes and Bands
of the Yakama Nation ERWM

Established by the
Treaty of June 9, 1855

January 6, 2014

Kim Ballinger
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, A7-75
Richland, WA 99352

Steve Lowe
Washington Department of Ecology
3100 Port of Benton Blvd
Richland WA 99354

Subject: Review of Class 3 Modifications to the Hanford Site RCRA Permit for the Low-Level Burial Grounds Trenches 31, 34 and 94, the Central Waste Complex and Waste Receiving and Processing Facility (CWC-WRAP) and the T-Plant Complex (T-Plant).

Dear Ms. Ballinger and Mr. Lowe:

The Confederated Tribes and Bands of the Yakama Nation is a federally recognized sovereign pursuant of the Treaty of June 9, 1855 made with the United States of America (12 Stat. 951). The U.S. Department of Energy Hanford site was developed on land ceded by the Yakama Nation under the 1855 Treaty with the United States. The Yakama Nation retains reserved rights to this land under the Treaty.

These modifications to the Hanford RCRA Permit Rev. 8C are in part the result of actions required by the Consent Agreement and Final Order (CAFO-No. RCRA-10-2013-0113) executed by the U.S. Department of Energy (DOE) and the U.S. Environmental Protection Agency (EPA) dated June 26, 2013. The Confederated Tribes and Bands of the Yakama Nation appreciate the opportunity to review and provide comments on these documents.

We look forward to discussing our concerns.

Sincerely,

Russell Jim
Yakama Nation ERWM Program Manager

cc:
Matt McCormick, Manager, US Department of Energy
Jane Hedges, Washington State Department of Ecology
Ken Niles, Oregon Department of Energy
Stuart Harris, CTUIR
Gab Bohnee, Nez Perce

Marlene George, YN ERWM
Administrative Record

Attachment:
Note these comments do not reflect a detailed description of all our concerns.

Attachment 1: Major Concerns:

Interim Status Standards & the RCRA Permit:

1. Ecology has stated "Prior to the issuance of the permit in 1994, Hanford Site TSD units operated under interim status—a status provided for under RCRA, which grants a Facility the right to continue to operate in accordance with applicable RCRA or state regulations until a RCRA final status permit is issued. Any TSD unit not included in the initial Permit, which became effective in 1994, was to be incorporated through a permit modification process (a change control process defined in WAC 173-303-830). This process was initiated by the submittal of a Part B permit application, closure plan, closure/post-closure plan, and/or post-closure permit application in accordance with WAC 173-303-610, -803, -806.The TSD units not yet incorporated into the original Permit were to continue to operate under interim status requirements WAC 173-303-400." **All modification documents support DOE's continued RCRA operations under Interim Status Standards despite violations of WAC 173-303-400 and -805 requirements.**

   However, under EPA/DOE Consent Agreement and Final Order (CAFO-No RCRA-10-2013-0113), DOE was charged with failure to comply with Land Disposal Restriction [WAC 173-303-140] at the Low-level Burial Grounds Trenches 34. This is a clear violation of the Interim Status standards of WAC 173-303-400(3)(i) and the WAC 173-303-805 requirements. **All operations for all Hanford site units operating under interim status standards should cease immediately and until such time they are fully permitted under WAC 173-303-806, including for closure of the CWC, T-Plant and LLBG storage areas as required pursuant to the EPA Order. Continued operations under interim status standards should be subject to RCRA final status permit requirement violation penalties.**

   Furthermore, we request Ecology <u>bar</u> any offsite waste shipments to CWC and/or LLBG. We request EPA to also <u>bar</u> any offsite waste shipments to the Hanford site CWC and LLBG facilities under the CERCLA offsite waste rules [40 CFR 300.440(a)] due to these substantial violations.

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3. No Sections on Container Receipt and Inspection and non-acceptable waste shipment within the Inspection or Closure Plans rendering these documents incomplete.

Personnel Training Plans:

1. Documents are structured to reflect only training for personnel dealing with sub-units which are closing and deemed to be with or without having any dangerous waste present. Unless there are different training plans [i.e., operating units] then this plan should be structured to reflect both closing units and operational units to comply with WAC 173-303-330 requirements.

2. Rev 8C Permit Attachment 5 is stated as describing the specific requirements of the personnel training program, but is not available for public review. Attachment 5 may not be sufficient and also require revision.

3. The statement "The SWOC Closure Units Dangerous Waste Training Plan (DWTP) provides a complete description of the personnel training requirements" is misleading. This Addendum is the Personnel Training Plan. Alone, it does <u>not</u> fulfill compliance with WAC 173-303-330(2)(a) and (b).

4. Misleading statements are made which support the premise that what is designated on the Part A form reflects permit conditions (e.g., "The LLBG Trench 31-34-94 closure unit where dangerous waste containers are no longer present is FS-1" and " The Permittees will comply with the following training matrix, which provides training requirements for Hanford Facility personnel associated with the Solid Waste Operations Complex (SWOC) Central Waste Complex Waste Receiving and Processing Plant (CWC-WRAP) closures.") **This falsely states the premise that only these three trenches are the LLBG and that that CWC & WRAP have authority to be designated as one facility.)**

5. Training matrix tables do not include all necessary personnel (e.gs. Building Emergency Director, Regulatory Compliance [unless that position is included in the ECO position], groundwater samplers). The Operations Supervisor should be trained in all areas. Additional trainings should be required for other listed personnel as well.

6. Additional trainings for surveillance personnel [including inspectors and groundwater samplers] should be required.

Closure Plans:

1. **Scrutiny of Closure Plans show there is nothing in them which compel DOE to do work now** (i.e., There is nothing in these Closure Plans [including in descriptive/informational sections] which compel to have a schedule to remove, treat and dispose of all illegally stored wastes at CWC**).**

   The proposed schedule and listing of Tri-Party Milestones [acknowledging a general TPA agreement for removal by 2030] does not fulfill WAC 173-303-610 requirements to have a detailed, complete closure plan to include a specific detailed closure activity schedule with complete removal of wastes in 180 days. The TPA schedule is even beyond the next Permit re-application cycle. DOE is not in compliance with EPA's CAFO-No RCRA-10-2013-0113 to submit complete closure plans per WAC 173-303-610 requirement. There are no details included which provide for the monitoring [or characterization] for the decades of proposed storage. Permitted treatment facilities [e.g., Perma Fix] are available; there is no justifiable defense for non compliance with WAC 173-303-610.

   Furthermore, operational history at these sites does not substantiate DOE's claim to have demonstrated it has (or will) take steps to prevent threats to human health and the environment including compliance requirements [WAC 173-303-110, -200, -310, -320, -330, -340, -360, and -380]. [231ZDR-11 container noted in Outside Storage Area A (Area A) closure plan as *an area of interest* & Ecology letter 12-NWP-039]. Removal is urgently needed before there is another leak, fire or explosion.

2. **Clarification is also requested as to what basis Ecology has to authorize continued management of wastes in a dangerous waste management that has already failed or is so poorly managed so as to result in releases to soils and the environment or has violated WAC 173-303-400 [see CAFO-No RCRA-10-2013-0113].** Another example is in the case of the floor of Room 152; it is sealed concrete that does not provide secondary containment. Dangerous waste containers meeting the criteria specified in WAC 173-303-630(7)(c) are stored on standard pallets to ensure elevation off of the concrete floor. Dangerous waste packages not meeting the criteria specified in WAC 173-303-630(7)(c) (e.g., waste package containing free liquids) are placed on portable spill containment equipment such as spill pallets meeting the criteria specified in WAC 173-303-630(7)(a)and (b). WAC 173-303-6307(c) bars free liquid storage in noncompliant facility storage.

3. Erroneous statements that approval of Closure Plans will grant the Hanford Site an extended closure period in accordance with WAC 173-303-610(4)(c) without any modification requests being submitted to Ecology. Any subsequent changes to the approved closure plan or schedule require a permit modification in accordance with WAC 173-303-830/-840.

4. Closure plans must comply with the WAC 173-303-610 requirements; closure plans do not 'simply represent a baseline for closure' as stated. WAC 173-303-610(3)(iv thru vi) requires more information and details which are not included in these Closure Plans.

- Lacking detailed descriptions of steps needed to remove or decontaminate all dangerous waste residues and contaminated containment system components, equipment, structures and soils, including methods for sampling and testing of surrounding soils and criteria for determining the extent of decontamination required to satisfy the closure performance standards.
- Lacking details of compliance with WAC 173-303-630 & WAC73-303-695 requirements. [e.g., The current LLBG container storage pads are not in compliance with WAC 173-303-630 requirements [and a discrepant container does not meet LDR standards for placement on these pads]; Sections of 221-T Building have been designated as a Containment Buildings [221-T Railroad Tunnel, 221-T Canyon Deck, and selected 221-T Cells (7L, 13R, 17R).]
- Lacking details of compliance with WAC 173-303-640(6). [E.g., Given that wastes remain in some tanks (see Part A form text cited above), the tanks continue to actively manage wastes, and they must continue to follow applicable tank requirements at least until removal of waste has been completed, if not until certification of completion of closure has been submitted to Ecology. Tank inspections shall include inspection of overfill controls, aboveground indications of corrosion or release of wastes, data gathered from monitoring any leak detection equipment, the construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system to detect erosion or signs of releases of dangerous wastes. Tank inspection shall include inspection of cathodic protection systems, if present.]
- Lacking details of compliance with WAC 173-303-680(2). [E.g., Miscellaneous unit]
- Lacking details of how compliance with WAC 173-303-140(2) will be met prior to storage or disposal.
- Lacking details of compliance with the requirements of and 40 CFR 264.1101(c)(4) [incorporated by reference at WAC 173-303-695]. [E.g., Containment building].
- Lacking following text to ensure public involvement opportunities: Any updates to SAP shall be through the permit modification process in accordance with WAC 173-303-830/840.
- Lacking following (or similar) text to ensure prevention of soil and groundwater contamination: Clean closure of the soil under the CWC structures and modules will be accomplished by demonstrating that the coated concrete floors kept contamination from reaching the soil. The coated concrete floors provided secondary containment for the storage and treatment areas of CWC. Unless inspections identify potential through-thickness cracks indicating containment failure and a subsequent for potential soil contamination from the TSD unit operations, the soil will be considered clean closed. Should inspections identify such cracks, potential soil and groundwater contamination will be investigated as an unexpected event during closure. In this circumstance, a sampling and analysis plan for characterizing the nature and extent of soil contamination will be prepared following the completion of a data quality objectives process in accordance with EPA/600/R-96/055 (QA/G-4), *Data Quality Objectives Process,* as amended. The data quality objectives process will be initiated prior to closure on a schedule to ensure timely closure of CWC. The sampling and analysis plan will be submitted to Ecology as part of a permit modification request in accordance with WAC 173-303-830. This permit modification request will also establish constituents of concern, soil

remediation requirements, soil closure performance standards, and associated sampling, analysis, and QA/QC requirements necessary to demonstrate compliance with closure performance standards. The sampling and analysis plan will be prepared consistent with EPA/240-B-01/003 (EPA/QA R-5), *EPA Requirements for Quality Assurance Project Plans*, as amended.

- Lacking consistency in requirements for IQRPE actions.
- Lacking consistency in requirements for decontamination per WAC 173-303.
- Lacking consistency in requirements for removal of and disposal of contaminated media [including rinsate].
- Lacking consistency in designation of dangerous and/or mixed waste provisions of WAC 173-303.
- Lacking consistency between closure plan tables and Part A tables and/or area dimensions/volumes.
- Lacking (in some instances) evaluations of compliance with [WAC 173-303-630(4), - (7), Subpart CC control standards (40 CFR 264.1084 - 264.1086), and Ecology Publication ##09-05-007 [Guidance for Preparing Waste Sampling and Analysis Documents and QA/QC Requirements at Nuclear Waste Sites.
- Lacking (in some instances) the estimated maximum waste inventory; WAC 173-303-610(9) & (10) discussions; and Post-Closure Care -610(7) & (8) discussions.
- Lacking section on Container Receipt and Inspection and non-acceptable waste shipment within the Inspection or Closure Plans.
- Including statements regarding clean closure determinations by DOE which are under Ecology's authority [e.g., Allowing concrete floorings to remain in place; Some closure units will remain in "as is" state citing nearby operating DWMU when in reality, information presented in figures do not support claims to not need to comply with clean closure standards of WAC 173-303-610(2). Closuring units which are easily and safely accessible should not delay or defer required closure actions subject to TPA Milestones.
- Including statements not in compliance with WAC 173-303-830 requirements (e.g., "Subsequent changes to the closure schedule will not require a permit modification and a separate extension request will not be filled".)
- Inconsistent format between similar documents.

5. Clarification is needed to differentiate between closure performance standards for soils, groundwater, surface water, and air, subject to -610(2)(b)(i) and <u>which are not</u> being established in this closure plan, and -610(2)(b)(ii), which are established by Ecology. Closure Performance standards for structures are to be set by Ecology on a case by case basis.

1. **SAPs: Sampling and analysis for exceedence of MTCA Method B standards <u>do not require</u> following the *observational approach* and unfiltered sampling for SAPs. Additional soil removal and re-sampling until these standards are not exceeded is not required and should be. The following are requested to be included in all SAPs:**
    - Employment of a 'methods based approach' to all sampling, provide all suite analysis results, and evaluate data to ensure verification sampling demonstrates no exceedances of unrestricted numerical cleanup levels <u>should also be a requirement</u> of the clean closure determination process. Use of the 'judgmental sampling' approach should be limited and in no way substitute for the required a statistical approach. Discrete samples should target the most likely to be highest site of contamination.

- Verification soil sampling performed during closure activities must demonstrate that any residual dangerous wastes, dangerous waste constituents, and/or residues do not exceed the unrestricted numerical clean ups levels in accordance with the Model Toxics Control Act (MTCA) regulations calculated according to MTCA Method B (2007, as amended).
- The Sampling and Analysis Plans to have consistency with Ecology Publication #09-05-007 Guidance for Preparing Waste Sampling and Analysis Documents and QA/QC Requirements at Nuclear Waste Sites.
- Methods are not discussed. Steps are conceptual rather than defined as required.

  Associated issue: The Sampling and Analysis Plans (and Waste Analysis Plans) and criteria for waste acceptance at the LLBG should be informed by the results of the Risk Budget Tool.

2. Some closure units will remain in "as is" state citing nearby operating DWMU when in reality, information presented in figures do not support claims to not need to comply with clean closure standards of WAC 173-303-610(2**). Closuring units which are easily and safely accessible should not delay or defer required closure actions subject to TPA Milestones.**

Related Issue: Factsheet and public hearings:

The Factsheet provided to the public did not fully disclose DOE violations and the content of the EPA Consent Agreement and Final Order (CAFO-No RCRA-10-2013-0113). This does not comply with the requirements of WAC 173-303-830(4)(c)(iii) to have supporting documents available, etc. The YN ERWM program requests a new public involvement comment period including public hearings around the region with full discussions of the following:

- EPA Consent Agreement and Final Order (CAFO-No RCRA-10-2013-0113).
- Closure schedule for removal and treatment of illegally stored wastes and how it complies with WAC 173-303-610(4) and the CERCLA offsite waste rule and relevant standards
- DOE's SEPA checklist submittal for this permitting action.
- Unit operations under interim status standards and Ecology's obligations under WAC 173-303-400(3)(i) and 173-303-805(8)(d)

From:	Vaughn Zeitzwolfe
To:	Hanford (ECY)
Cc:	office@hoanw.org
Subject:	Comment on USDOE's Proposed Changes to Hanford Hazardous Waste Permit
Date:	Sunday, January 05, 2014 8:56:51 PM

The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to **remove and treat ALL illegally stored wastes within 3 years**. The Department of Ecology should include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

We need to have public hearings across the region on the proposed changes, including a hearing in Portland, Oregon.

The public notice for the next round of review, comment and hearings **must fully disclose** that these permit changes were ordered by EPA due to USDOE illegally storing and disposing of wastes. **The notice should disclose that wastes have leaked and explain the risks of prolonged storage.**

The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford; and, if leakage from disposal trenches is projected to contaminate groundwater.

The USDOE needs to reassess the environmental impact of dumping radioactive toxic waste in such close proximity to a river, groundwater, and on permeable soil; granite bedrock in a desert environment is the only location this sort of waste can to be deposited to be environmentally viable.

Concerned Citizen,
Vaughn Zeitzwolfe

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DEPARTMENT OF ECOLOGY
NWP - RICHLAND

1-3-14

Hello,

My name is Craig Edwards. I live in Carlton WA. I am very concerned about Hanford, its pollution and the clean up.

Recently the U.S. D.O.E. has applied for a permit from your agency to put off any removal or treatment of thousands of drums and containers of illegally stored waste.

I urge the W.S.D.O.E., your agency, to not approve any permit that gives the U.S.D.O.E. no enforceable schedule or no deadlines to remove and treat the waste

I also urge the W.S.D.O.E. to stand strong and require that the U.S.D.O.E. do the right thing, follow the law, respect the Washington State voters and their decision The U.S.D.O.E. must follow an enforceable schedule to remove and treat all the waste they created at Hanford and not be allowed to bring in more for storage.

Thank you for this opportunity to comment

Respectfully,

Craig Edwards
1760 Hwy 153
Carlton, WA 98814

over please →

P.S. Wash. state DOE needs to schedule public meetings on this subject in Seattle, Portland Spokane and why not Yakima or Wenatchee?

Thanks

Craig

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Ms. Jane Camero
1027 Columbia St
Hood River, OR 97031

January 1, 2014

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

JAN 06 2014

DEPARTMENT OF ECOLOGY
NWP - RICHLAND

Dear Mr. Steve Lowe:

I am writing on New Year's Day in hope that true clean-up will take place at the Hanford Nuclear Reservation. I insist that Washington State issue firm schedules to treat and remove the illegally stored wastes within 3 years. I also ask for public meetings in 2014, more honesty, exhuming and treating trench waste, as well as no further import of waste. I ask that USDOE proposal include asking Congress for funding.

It is time to change Hanford's hazardous waste (RCRA) permits for storing and disposing of radioactive wastes "mixed" with hazardous chemicals. It is my understanding that these important proposals are in response to a USEPA Order issued due to the violations of state and federal hazardous waste laws. We need to please be much more honest and much smarter. Illegally stored containers at the "Central Waste Complex" leaked, USDOE claimed the leakage was just rainwater!!! Sampling of the leakage in 2012 found cadmium, chromium, lead, mercury and polychlorinated biphenyls (PCB's). Hello!

USDOE's proposal needs to include enforceable schedules to remove and treat the wastes. Hundreds of people submitted comments to Ecology in 2012 on the Hanford hazardous waste permit urging that ALL illegally stored wastes should be removed from the Central Waste Complex and treated within three years. Ecology withdrew those proposed permit changes! USDOE's proposal blatantly omits any timeline for removing and treating the wastes. We need more than a Tri-Party Agreement for waste removal by 2030! State and federal hazardous waste law rules require "closure" plans to have specific schedules to allow tracking of progress, with complete removal of wastes in 180 days!!

Supposedly dry waste is leaking liquid and contaminating human beings. The wastes have been improperly misidentified and have been illegally stored for 18 years without a permit. But federal and state laws forbid storing wastes which are not dry and require that wastes be removed from storage to be treated within a year. Violations are deadly! That is why the law requires USDOE to remove hazardous wastes within a year. The Hanford hazardous waste permit for the Central Waste Complex (CWC) should require USDOE to remove and treat all illegally stored wastes within 3 years. The Department of Ecology should include a schedule for removing and treating the 68,000 drums of wastes stored illegally inside CWC within 3 years, as well as a schedule to remove and treat all of the waste stored outside.

Violations continue in Hanford's Low-Level Waste Burial Grounds also where waste in 43 miles of trenches is just covered with dirt rather than exhumed and treated. Still only two trenches are lined? This has been illegal since the 1970's, when federal and state hazardous waste laws barred dumping garbage or hazardous waste. Last year the EPA documented that USDOE had illegally buried "high temperature gas reactor" and other drums of mixed chemical and radioactive wastes in the trenches without treatment. USDOE's proposal IS a 'cover-up', not cleanup and exactly why the permit should

require exhuming and treating wastes from all of Hanford's trenches. No further offsite waste should be added. It is imperative that we protect our groundwater!!

I have a question: Why didn't the notice sent by USDOE and Washington Ecology disclose that the proposal is the result of an EPA Order due to USDOE's illegal storage and disposal of wastes? These notices are counterproductive for Hanford cleanup. When another public comment period on Ecology's response in 2014 is scheduled, public notices should fully disclose key facts! I would like to see public hearings o the proposed changes across the region, including in Hood River, OR.

Most disturbingly, on December 13, 2013, USDOE issued a formal decision on the Tank Closure Waste Management EIS that it may bring MORE waste to Hanford, but will delay import until it has the vitrification plant operating. Whether the vitrification plant operates has no bearing on USDOE's ability to safely store or dispose of more waste at Hanford. The USDOE has failed to consider the risks of shipping and storing the wastes at Hanford. There was no Environmental Impact Statement and USDOE did not have a hazardous waste permit to store the wastes! There is no safe storage for these wastes and the USDOE fails to have them treated to make them safe to store. The Hanford RCRA permit should specifically bar USDOE from being allowed to add any more waste from offsite to Trenches 31 and 34, or any storage or disposal facility, while existing wastes are illegally stored anywhere at Hanford. The USDOE has failed to ask Congress to fund removal and treatment. If included in the permit, USDOE will be required to ask Congress for the funding to meet the closure plan schedule. Why for God's sake not?? We need all the help we can get to make the reservation and the Columbia River safe.

Thank you for taking written comments. May our new year bring more positive changes to Hanford.

Sincerely,

Jane Camero

Kathleen Yockey
1760 Hwy 153
Carlton, Wa
98814

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Jan 2, 2013

JAN 06 2014
DEPARTMENT OF ECOLOGY
NWP - RICHLAND

RE: USDOE - ROD - TCWM EIS

I am writing in concern to the USDOE issued "record of decision on Dec 13, 2013, regarding clean-up, tank closure and waste management TCWM - EIS at the Hanford Nuclear Reservation in Eastern Washington state.

Despite thousands of comments and large public participation at all of the hearings of the past years regarding clean up and future storage at the Hanford site, the DOE's has shown disregard for U.S. and Wa. state citizens. The Dept of Energy and Ecology both U.S. and state levels have a responsibility to protect the people, land, air and waters of Washington state and the entire country.

I am solidly opposed to importing more radioactive waste to Hanford. Hanford is already a leaking mess and its proximity to the Columbia River is a poor choice for a National deposit site.

The DOE plans to put off clean up is an atrocity. The Hanford clean up has been a debacle. The contractors are incompetent and there is a mistrust of information put forth by the DOE.

Before any conversation of bringing future waste to Hanford the current problems need to be addresses now — not put off years down the road.

This is a public Health issue and further comment and public meetings thru out the state must be held to accurately inform the public and to seek input from Washington State Citizens. The health and well being of generations are in your hands. Put the citizens, land, air and water ahead of corruption and selfish gains.

Sincerely,
Kathleen Yockey

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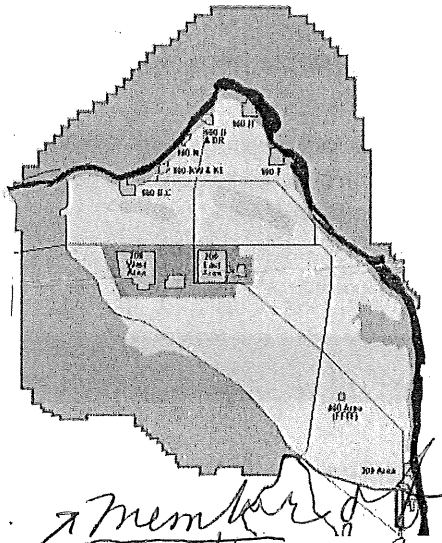
Fact Sheet

January 2/14

Hanford Public Involvement Opportunity

WA Dem
Ms. Marion Moos
1318 W 14th Ave
Spokane WA 99204



We want to hear from you on the proposed permit modifications for an area of the Hanford Site!

Steve Lowe
Washington State Department of Ecology
3100 Port of Benton Rd
Richland, Wa 99354
Re: Hanford Site Permit Modification - Ms. Marion L. Moos (1358)

Member of E.E. Tent of Amen

I AM OPPOSED.

The DOE-RL contact person for this permit change is Kim Ballinger, (509) 376-6332. The Washington State Department of Ecology contact person is Steve Lowe, (509) 372-7950.

The permittees' compliance history during the life of the permit being modified is available from the Washington State Department of Ecology contact person.

Copies of the proposed permit modification and supporting documentation are available at the Administrative Record, 2440 Stevens Drive, Richland, WA.

How you can become involved

Comment period – October 30-January 6.
Public meeting – December 9, 5:30-6:30 pm, Richland Library (955 Northgate Drive, Richland)
Please submit comments by *January 6, 2014* to:

Steve Lowe
Washington State Department of Ecology
3100 Port of Benton Blvd
Richland, WA 99354
Email: Hanford@ecy.wa.gov