DEPARTMENT OF
ECOLOGY
State of Washington

Response to Comments

Waste Water Discharge Permit ST-4500 Renewal

September 8 – October 10, 2014

Summary of a public comment period and responses to comments

December 2014
Publication no. 14-05-021

PUBLICATION AND CONTACT INFORMATION

This publication is available on the Department of Ecology's (Ecology) website at https://fortress.wa.gov/ecy/publications/SummaryPages/1405021.html

For more information contact:

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Nuclear Waste Program
3100 Port of Benton Boulevard
Richland, WA 99354

Phone: 509-372-7950
Hanford Cleanup Line: 800-321-2008
Email: Hanford@ecy.wa.gov

Washington State Department of Ecology - www.ecy.wa.gov

- Headquarters, Lacey 360-407-6000
- Northwest Regional Office, Bellevue 425-649-7000
- Southwest Regional Office, Lacey 360-407-6300
- Central Regional Office, Yakima 509-575-2490
- Eastern Regional Office, Spokane 509-329-3400

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

Waste Water Discharge Permit ST-4500 Renewal
September 8 – October 10, 2014

Department of Ecology
Nuclear Waste Program
3100 Port of Benton Boulevard
Richland, Washington 99354

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INTRODUCTION

The Washington State Department of Ecology requires industrial facilities in the state to have a permit before discharging waste or chemicals to the waters of the state, including groundwater. When a new permit or a significant change to an existing permit is proposed, we hold a public comment period to allow the public to review the changes and provide formal feedback.

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:	September 8 – October 10, 2014
Permit:	State Waste Discharge Permit Number ST-4500 for state-approved land disposal site
Original issuance date:	June 30, 1995
Draft effective date:	January 1, 2015

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 ISSUING THE PERMIT

Near the center of Hanford, the soil has a lot of contamination. It is important that cleanup work does not make the contamination worse. This permit ensures that water discharged to the ground meets the state's standard to protect human health and the environment (WAC 173-200 "Water Quality Standards"). The permit is for the disposal of liquids after they are treated in Hanford's Effluent Treatment Facility. The discharge site is just north of Hanford's 200 West Area, near central Hanford.

Waste water discharge permits have a term of five years. After that, they must be renewed if the need is still present. Since the Effluent Treatment Facility remains in operation, this discharge permit must be renewed.

There is one key change from the old permit. Ecology moved the point of compliance from the groundwater monitoring wells to the tanks where the water is stored after treatment before it is discharged. A "point of compliance" is the place where the liquid being discharged is measured to ensure it is within the permit defined limits.

PUBLIC INVOLVEMENT ACTIONS

Ecology's Nuclear Waste Program encouraged public comment on the Waste Water Discharge Permit Number ST-4500 renewal during a 30-day public comment period held September 8 through October 10, 2014.

Ecology took the following actions to announce the comment period:

- Mailed a public notice announcing the comment period to 1,953 interested members of the public.
- Emailed two advance notices of the comment period to the Hanford-Info email list, which then had 1,454 recipients.
- Placed a public announcement legal classified advertisement in the *Tri-City Herald* on September 8 and September 9, 2014.
- Sent a notice announcing the start of the comment period to the Hanford-Info email list.
- Sent the notice to Ecology's Water Quality Info listserv, which had 1,173 subscribers.
- Tweeted on Ecology's @ecyhanford Twitter page that five comment periods, including this one, were open.

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

- Comment period summary
- Transmittal letter
- Fact sheet
- Permit

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

1. Advance notices (on May 16, 2014, then August 7, 2014) sent to Hanford-Info email list
2. Comment period summary
3. Classified advertisements in the *Tri-City Herald*
4. Notice sent to the Hanford-Info and Water Quality Info email lists
5. Event posted on Ecology @ecyhanford Twitter page

RESPONSE TO COMMENTS

Ecology accepted comments on the Waste Water Discharge Permit renewal from September 8 through October 10, 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).

Description of Comments:

One person commented on the draft permit: Mark Bowman, from Hanford contractor CHPRC (CH2M Hill Plateau Remediation Company). A verbatim copy of the comment is attached in Appendix B.

Comment from Mark Bowman, dated October 6, 2014:

There are inconsistencies about which SALDS wells are being sampled. Well 699-48-77A is dry. Wells 699-48-77C and -77D are still being sampled. The table in Section S2A is incorrect; Section S10 is correct.

Ecology Response:

Thank you for your comment. We have corrected the well identification number in the table in Section S2A. Well number 699-48-77A has been changed to 699-48-77C.

APPENDIX A: COPIES OF ALL PUBLIC NOTICES

Public notices for this comment period:

1. Advance notices sent to the Hanford-Info email list
2. Comment period summary
3. Classified advertisement in the *Tri-City Herald*
4. Notice sent to the Hanford-Info email list
5. Notice sent to Ecology's Water Quality Info email list
6. Event posted on Ecology @ecyhanford Twitter page

From: Brown, Madeleine (ECY) <mabr461@ecy.wa.gov>
Sent: Friday, May 16, 2014 11:35 AM
To: hanford-Info@listserv.wa.gov
Subject: advance notice - comment period for water discharge permit

This is a message from the Washington Department of Ecology

Comment period – advance notice

The Department of Ecology's Nuclear Waste Program will hold a 30-day comment period starting in late June 2014 for a renewal of a water discharge permit. The permit is for the State-Approved Land Disposal Site (SALDS) for Hanford's 200 Area Effluent Treatment Facility.

The permit is issued to the U.S. Department of Energy, Richland Operations Office. The SALDS is where the U.S. Department of Energy disposes of the water after it is treated to remove its contaminants. The permit is a renewal and will be in effect for five years. The permit first took effect in 1995.

We do not plan to hold a public meeting, but can reconsider if there is significant interest.

Contact Ecology at Hanford@ecy.wa.gov or 800-321-2008 for more information or to request a meeting.

Waste Water Discharge Permit Renewal

The Washington State Department of Ecology (Ecology) invites you to comment on the renewal of Hanford's permit for discharging treated liquids from the Effluent Treatment Facility.

The official name of the permit is "State Waste Discharge Permit Number ST0004500 for the state-approved land disposal site," or SALDS. A waste water discharge permit must be renewed every five years.

What Does the Permit Cover?

Hanford's Effluent Treatment Facility treats liquid waste. After the liquid is treated, it is discharged to the ground. The permit ensures the discharged liquids meet state standards in WAC 173-200 "Water Quality Standards."

How Did the Permit Change?

There is one key change. Ecology moved the point of compliance from the groundwater monitoring wells to the tanks where the water is stored after treatment before it is discharged.

A "point of compliance" means the place where the liquid to be discharged is measured to ensure it is within the limits the permit defines.

The discharge site is just north of Hanford's 200 West Area, near Hanford's center.

WHY IT MATTERS

Near the center of Hanford, the soil has a lot of contamination. It's important that today's cleanup work does not worsen the problems.

This permit ensures that water discharged to the ground meets the state's standard to protect human health and the environment.

Public Comment Period

September 8 – October 10, 2014

To submit comments or request a public hearing, contact (in writing):

Stacy Nichols
3100 Port of Benton Blvd
Richland, WA 99354
hanford@ecy.wa.gov

Document Review Locations:

Nuclear Waste Program website
www.ecy.wa.gov/programs/nwp/commentperiods.htm

Public Information Repositories (see page 2 for locations and contact information.)

Tips on Effective Commenting

http://www.ecy.wa.gov/biblio/0307023.html

Special Accommodations

To request ADA accommodation for disabilities, or printed materials in a format for the visually impaired, call Ecology at 509-372-7950.

Persons with impaired hearing may call Washington Relay Service at 711. Persons with speech disability may call TTY at 877-833-6341.

DEPARTMENT OF ECOLOGY
State of Washington
3100 Port of Benton Blvd
Richland, WA 99354

Public Comment Period
Waste Water Discharge Permit Renewal
9/8/2014 – 10/10/2014

Will There be a Public Hearing? We don't have one scheduled, but if we get requests, we may reconsider. (See sidebar on page 1)

What's Next? When the comment period closes, we will consider the comments received and revise the permit if needed. Then we will issue the final permit and a response to comments.

Hanford's Public Information Repositories and Other Review Locations

University of Washington
Suzzallo Library, Govt Pubs Dept
Seattle, WA 98195
Hilary Reinert (206) 543-5597
Reinerth@uw.edu

Gonzaga University
Foley Center Library
East 502 Boone Ave.
Spokane, WA 99258
John S. Spencer (509) 313-6110
Spencer@gonzaga.edu

Department of Ecology
Nuclear Waste Program
Resource Center
3100 Port of Benton Boulevard
Richland, WA 99354
Valarie Peery (509) 372-7920
Valarie.Peery@ecy.wa.gov

Portland State University
Government Information
Branford Price Millar Library
1875 SW Park Avenue
Portland, OR 97207-1151
Claudia Weston (503) 725-4542
westonc@pdx.edu

Washington State University
Consolidated Information Center
Room 101L
Richland, WA 99354
Janice Parthree (509) 375-7443
Janice.Parthree@pnnl.gov

Department of Energy
Administrative Record
2440 Stevens Drive, room 1101
Richland, WA 99354
Heather Childers (509) 376-2530
Heather_M_Childers@rl.gov

Classified Legals

The Washington State Department of Ecology invites you to comment on the renewal of Hanford´s permit for discharging treated liquids from the Effluent Treatment Facility. The discharge site is just north of Hanford´s 200 West Area, near Hanford´s center.

The official name of the permit is "State Waste Discharge Permit Number ST0004500 for the state-approved land disposal site," or SALDS. A waste water discharge permit must be renewed every five years.

The public comment period is **September 8 through October 10, 2014**. To submit comments, send them to Stacy Nichols, 3100 Port of Benton Blvd, Richland, WA 99354, or Hanford@ecy.wa.gov. Email is preferred.

A public meeting is not schedule but could be held if we receive requests and reconsider. To request a public meeting, contact Stacy Nichols.

The permit matters. Near the center of Hanford, the soil has a lot of contamination. It´s important that today´s cleanup work does not worsen the problems.

This permit ensures that water discharged to the ground meets the state´s standard to protect human health and the environment

There is one key change in the permit. Ecology moved the point of compliance from the groundwater monitoring wells to the tanks where the water is stored after treatment before it is discharged.

A "point of compliance" means the place where the liquid to be discharged is measured to ensure it is within the limits the permit defines.

You can review the permit online at www.ecy.wa.gov/programs/nwp/commentperiods.htm. You can also visit one of the document review locations (below). For tips on effective commenting, visit www.ecy.wa.gov/biblio/0307023.html

After the comment period closes, we will consider the comments received and revise the permit it needed. Then we will issue the final permit and a response to comments.

Hanford´s Public Information Repositories and other review locations:

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(509) 376-2530
Heather_M_Childers@rl.gov

Washington State
University Consolidated
Information Center
Room 101L Richland,
WA 99354
Janice Parthree
(509) 375-7443
Janice.Parthree@pnnl.gov

#14-7555 9/7 & 9/8/2014

Classified Legals

BID MEETINGS

Tuesday September 9:
Benton Irrigation District is having a Board of Directors meeting at 3:00PM at the Benton Irrigation District office on N Highland. The meeting is open to the public.

Wednesday September 10:
The Benton Irrigation District is having a contract workshop meeting at 9:00AM at the Benton Irrigation District office on N Highland. The meeting is open to the public.

Monday September 22:
The Benton Irrigation District is having a Board of Directors meeting at 8:00AM at the Benton Irrigation District office on N Highland. The meeting is open to the public.
#14-7605 9/7 & 9/8/2014

Legal Notice

The Schroth Family Charitable Trust annual report forms for the year ended June 30, 2014 are available for inspection. Any citizen may request inspection upon notification of the principle trust officer within 180 days of publication of this notice. The trust manager is Janis Schroth Wood and may be reached at 3708 S. Green St., Kennewick, WA 99337. Phone (509)585-3663.
#14-7607 9/8/2014

The Washington State Department of Ecology invites you to comment on the renewal of Hanford's permit for discharging treated liquids from the Effluent Treatment Facility. The discharge site is just north of Hanford's 200 West Area, near Hanford's center.

The official name of the permit is "State Waste Discharge Permit Number ST0004500 for the state-approved land disposal site," or SALDS. A waste water discharge permit must be renewed every five years.

The public comment period is **September 8 through October 10, 2014**. To submit comments, send them to Stacy Nichols, 3100 Port of Benton Blvd, Richland, WA 99354, or Hanford@ecy.wa.gov. Email is preferred.

A public meeting is not schedule but could be held if we receive requests and reconsider. To request a public meeting, contact Stacy Nichols.

The permit matters. Near the center of Hanford, the soil has a lot of contamination. It's important that today's cleanup work does not worsen the problems.

This permit ensures that water discharged to the ground meets the state's standard to protect human health and the environment

There is one key change in the permit. Ecology moved the point of compliance from the groundwater monitoring wells to the tanks where the water is stored after treatment before it is discharged.

A "point of compliance" means the place where the liquid to be discharged is measured to ensure it is within the limits the permit defines.

You can review the permit online at www.ecy.wa.gov/programs/nwp/commentperiods.htm. You can also visit one of the document review locations (below). For tips on effective commenting, visit www.ecy.wa.gov/biblio/0307023.html

After the comment period closes, we will consider the comments received and revise the permit it needed. Then we will issue the final permit and a response to comments.

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Heather Childers
(509) 376-2530
Heather_M_Childers@rl.gov

Washington State
University Consolidated
Information Center
Room 101L Richland,
WA 99354
Janice Parthree
(509) 375-7443
Janice.Parthree@pnnl.gov
#14-7555 9/7 & 9/8/2014

To Place Your Legal Announcement, Call 582-1560

From: Bohrmann, Dieter (ECY) <DBOH461@ECY.WA.GOV>
Sent: Thursday, August 07, 2014 2:55 PM
To: HANFORD-INFO@LISTSERV.WA.GOV
Subject: Advance notice for comment period starting September 8

This is a message from the Washington Department of Ecology

Advance notice for comment period starting September 8

Ecology will hold a comment period September 8 – October 10, 2014, for the renewal of Hanford's permit for discharging treated liquids from the 200 Area Effluent Treatment Facility. The official name of the permit is State Waste Discharge Permit Number ST0004500, for the state-approved land discharge disposal site, or SALDS.

We do not plan to hold a public meeting but can reconsider if public interest warrants it.

When the comment period starts, you will be able to find the permit materials by visiting the Nuclear Waste Program's comment period web page and Hanford's information repositories.

Contact Hanford@ecy.wa.gov or call 800-321-2008 if you have questions or would like more information.

From: Brown, Madeleine (ECY)
Sent: Monday, September 08, 2014 11:05 AM
To: hanford-Info@listserv.wa.gov
Subject: Waste discharge permit renewal comment period starts today

Comment period starts today!

The Washington State Department of Ecology invites you to comment on the renewal of Hanford's permit for discharging treated liquids from the Effluent Treatment Facility.

The comment period starts today and runs through October 10, 2014. We do not plan to hold a public meeting but can reconsider if public interest warrants it.

The official name of the permit is "State Waste Discharge Permit Number ST0004500 for the state-approved land disposal site," or SALDS. A waste water discharge permit must be renewed every five years.

Hanford's Effluent Treatment Facility treats liquid waste. After the liquid is treated, it is discharged to the ground. The permit ensures the discharged liquids meet state standards in
WAC 173-200 "Water Quality Standards."

There is one key change proposed in this permit renewal: The point of compliance (where the treated liquid is measured to ensure it is within the limits the permit defines) is moved from groundwater monitoring wells to the tanks where the liquid is stored after treatment before it is discharged.

You will be able to find the permit materials by visiting the Nuclear Waste Program's comment period web page and Hanford's documents review locations.

Submit comments by October 10 to
Stacy Nichols (Hanford@ecy.wa.gov) (preferred)
3100 Port of Benton Boulevard
Richland, WA 99354
Fax 509-372-7971

When the comment period closes, we will consider the comments received and revise the permit if needed. Then we will issue the final permit and a response to comments.

Contact Hanford@ecy.wa.gov or call 800-321-2008 if you have questions or would like more information.

From: News and Information about water quality from the Department of Ecology <ECOLOGY-WATER-QUALITY-INFO@LISTSERV.WA.GOV> on behalf of Howard, Sandy (ECY) <srud461@ECY.WA.GOV>
Sent: Tuesday, September 09, 2014 11:52 AM
To: ECOLOGY-WATER-QUALITY-INFO@LISTSERV.WA.GOV
Subject: Public comment period: Hanford permit for discharging treated liquids

The Department of Ecology invites you to comment on the renewal of Hanford's permit for discharging treated liquids from the Effluent Treatment Facility.

The comment period is now open and runs through October 10, 2014. We do not plan to hold a public meeting but can reconsider if public interest warrants it.

The official name of the permit is "State Waste Discharge Permit Number ST0004500 for the state-approved land disposal site," or SALDS. A waste water discharge permit must be renewed every five years.

Hanford's Effluent Treatment Facility treats liquid waste. After the liquid is treated, it is discharged to the ground. The permit ensures the discharged liquids meet state standards in WAC 173-200 "Water Quality Standards."

There is one key change proposed in this permit renewal: The point of compliance (where the treated liquid is measured to ensure it is within the limits the permit defines) is moved from groundwater monitoring wells to the tanks where the liquid is stored after treatment before it is discharged.

You will be able to find the permit materials by visiting the Nuclear Waste Program's comment period web page and Hanford's documents review locations.

Submit comments by October 10 to:
Stacy Nichols at Hanford@ecy.wa.gov (email is preferred)
3100 Port of Benton Boulevard
Richland, WA 99354
Fax 509-372-7971

When the comment period closes, we will consider the comments received and revise the permit if needed. Then we will issue the final permit and a response to comments.

Contact Hanford@ecy.wa.gov or call 800-321-2008 if you have questions or would like more information.

SALDS SOCIAL MEDIA

APPENDIX B: COPIES OF ALL WRITTEN COMMENTS

From: Barnes, Brett M <Brett_M_Barnes@rl.gov>
Sent: Monday, October 06, 2014 7:54 AM
To: Nichols, Stacy (ECY)
Cc: Collins, Michael S; Engelmann, Richard H
Subject: COMMENT ON ST4500

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red Category

Good Morning Stacy,

I think you may have already received this comment on ST4500…but just in case you have not…see below comment from Mr. Mark Bowman. Should you have any questions, please give me a call on my cell phone, 521-3053.

Brett M. Barnes
Environmental Compliance Officer

From: Bowman, Mark W
Sent: Monday, October 06, 2014 7:50 AM
To: Barnes, Brett M

Brett,

This was the comment I had:

There are inconsistencies about which SALDS wells are being samples. Well 699-48-77A is dry. Wells 699-48-77C and -77D are still being sampled. The table in Section S2A is incorrect; Section S10 is correct.