



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

**Response to Comments**  
**Hanford Dangerous Waste Permit –**  
**Attachment 3, Security**  
**December 10, 2018 – February 11, 2019**

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*Summary of a public comment period and responses  
to comments*

April 2019

Publication no. 19-05-005

## Publication and Contact Information

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- |                                       |              |
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## **Response to Comments**

*Hanford Dangerous Waste Permit – Attachment 3, Security*

*December 10, 2018 – February 11, 2019*

Nuclear Waste Program  
Washington State Department of Ecology  
Richland, Washington

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## **Table of contents**

Introduction.....	1
Reasons for issuing the permit.....	1
Public involvement actions .....	2
List of Commenters.....	3
Attachment 1: Comments and responses	
Appendix A: Copies of all public notices	

## 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:	Hanford Dangerous Waste Permit – Attachment 3, Security December 10, 2018 – February 11, 2019
Permit:	<i>Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Attachment 3, Security (WA7890008967)</i>
Permittee(s):	<i>The U.S. Department of Energy</i>
Original issuance date:	<i>September 27, 1994</i>
Draft effective date:	<i>April 12, 2019</i>

To see more information related to the Hanford Site and nuclear waste in Washington State, please visit our website: <https://www.ecology.wa.gov/Hanford>.

## Reasons for issuing the permit

The Hanford Dangerous Waste permit establishes requirements to ensure that waste management activities are protective of human health and the environment. A component of the requirements addresses security, which must prevent the unknowing entry, and minimize the possibility of unauthorized entry, onto the Hanford Site.

Due to the large size of the Hanford Site, security is addressed at the site level, as well as for individual treatment, storage, and disposal units. Permit Attachment 3, *Security* addresses the site level security requirements.

The changes to Attachment 3 include descriptions of warning signs and locations, barricades and perimeter fences, and personnel access control. Attachment 3 also includes photographs of the various types of signs used to prevent unknowing or unauthorized entry onto the Hanford Site.

## **Public involvement actions**

Ecology encouraged public comment on the Draft Attachment 3, *Security Permit Modification* during a 60-day public comment period December 10, 2018, through February 11, 2019.

The following actions were taken to notify the public:

- Mailed a public notice announcing the comment period to 1300 members of the public.
- Distributed copies of the public notice to members of the public at Hanford Advisory Board meetings.
- Placed a public announcement legal classified advertisement in the *Tri-City Herald* on December 10, 2018.
- Emailed a notice announcing the start of the comment period to the [Hanford-Info email list](#), which has 1377 recipients.

The Permittee held a public meeting on January 16, 2019, at 5:30 p.m. at the Richland Public Library. 15 members of the public attended.

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
- Draft Attachment 3, *Security Permit Modification*

The following public notices for this comment period are in [Appendix A](#) of this document:

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

## List of Commenters

The table below lists the names of organizations or individuals who submitted a comment on the Permit Attachment 3, *Security* Permit modification. The comments and responses are in [Attachment 1](#).

Commenter	Organization
Jeanne Poirier	Citizen
Mike Conlan	Citizen
Ed Stock	Citizen



# **Attachment 1: Comments and responses**

## **Description of comments:**

Ecology accepted comments from December 10, 2018, through February 11, 2019. This section provides a summary of comments we received during the public comment period and our responses, as required by RCW 34.05.325(6)(a)(iii). Comments are grouped by individual and each comment is addressed separately.

## **Letter I-1: Jeanne Poirier, 12/22/18 7:29 PM PT**

### **Comment I-1-1**

Thank you for allowing public comment on regulations, decisions at Hanford. Better, increased signage is good! You have a huge responsibility and nearly impossible goal to keep safe the nuclear waste at Hanford now and in the future.

### **Ecology Response to I-1-1**

*Thank you for your comment. Ecology is working very hard to improve the current Hanford permit.*

## **Letter I-2: Mike Conlan, 12/30/18 4:37 PM PT**

### **Comment I-2-1**

Remove all nuclear waste,

### **Ecology Response to I-2-1**

*Thank you for your comment. Ecology is working to ensure long-term storage, treatment, and disposal of waste is protective of human health and the environment.*

### **Comment I-2-2**

Do not allow anymore nuclear waste into the facility,

### **Ecology Response to I-2-2**

*Thank you for your comment. The proposed permit changes are not to allow new waste, but to better manage the waste already at Hanford.*

### **Comment I-2-3**

Replace all the single storage tanks,

### **Ecology Response to I-2-3**

*Single-shell tanks are not in the scope of the Attachment 3 "Security" permit modification. Ecology does agree the tanks pose a threat. We believe a better approach to addressing it is to remove the waste from single-shell tanks and put it in the more compliant double-shell tanks to prepare for eventual treatment. The waste will be treated in the Waste Treatment and Immobilization Plant which is now being built.*

### **Comment I-2-4**

Stop all the nuclear leakage entering the Columbia River

#### **Ecology Response to I-2-4**

*Thank you for your comment. Stopping any potential nuclear waste from impacting the Columbia river is not within the scope of the Attachment 3 "Security" permit modification. Prevention of surface water impacts is addressed by operations associated with other units at Hanford.*

#### **Letter I-3: Ed Stock, 1/07/19 5:23 AM PT**

##### **Comment I-3-1**

How will Security be enforced regarding Hanford's Dangerous Waste?

##### **Ecology Response to I-3-1**

*Thank you for your comment, Security is enforced at Hanford through the use of Hanford Patrol. These highly trained security personnel are present on site 24 hours a day, 7 days a week, including Holidays. The Benton County Sheriff's Office also provides law enforcement support to the Hanford facility. The only people allowed on site must have a U.S. Department of Energy approved badge on display on their person. All Hanford personnel are trained to restrict access to unauthorized persons and to stop anyone who does not have an approved badge.*

##### **Comment I-3-2**

What measures will be enforced to prevent acquisition of Hanford's Dangerous Waste?

##### **Ecology Response to I-3-2**

*There are several different measures enforced to prevent acquisition of Hanford's Dangerous Waste. The main purpose of the security measures is to prevent the unknowing entry and minimize the possibility of unauthorized entry of persons onto the Hanford site. This is achieved through the use of signs that say "no trespassing" and warn of the dangers present. There are also other controls: 24-hour surveillance system, barriers such as facility fences (with and without barbed wire), locked gates and doors, and manned barricades at vehicular access roads.*

##### **Comment I-3-3**

When will the Yucca Mountain facility be completed so that the shipment of the High Level Waste can be safely shipped off the Hanford reservation?

##### **Ecology Response to I-3-3**

*Thank you for your comment. The Yucca Mountain facility is not in the scope of the Attachment 3 "Security" permit modification. Yucca Mountain is currently not authorized as a waste repository.*

## **Appendix A: Copies of all public notices**

Public notices for this comment period:

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

## PUBLIC COMMENT PERIOD

### Hanford Dangerous Waste Permit – Attachment 3, Security

*The U.S. Department of Energy Richland Operations Office is holding a 60-day public comment period from December 10, 2018, to February 11, 2019, for a Class 2 Permit Modification to the Hanford Dangerous Waste Permit. This modification proposes to update Attachment 3, Security.*

PUBLIC COMMENT PERIOD: December 10, 2018 – February 11, 2019

#### Background

The Hanford Site occupies 580 square miles in southeastern Washington state. Beginning in 1943, the site was used to produce plutonium for World War II and the Cold War and continued operations until the late 1980s. The waste remaining from those operations is a potential risk to human health and the environment, including the Columbia River.

In 1989, [DOE](#), [EPA](#) and [Ecology](#) entered into a legally binding accord, the [Tri-Party Agreement](#) (TPA), to clean up the Hanford Site.

Today, waste management and environmental cleanup are the main missions at Hanford. DOE manages the cleanup effort under the oversight of the regulatory agencies, EPA and Ecology. The Site cleanup effort involves dangerous waste treatment, storage and disposal. These activities are performed in accordance with the [Hanford Dangerous Waste Permit Revision 8C](#) (WA7890008967).

#### Overview

The Hanford Dangerous Waste permit establishes requirements to ensure waste management activities are protective of human health and the environment. A component of the requirements addresses security.

The permit specifies security requirements at the Site level, as well as for individual treatment, storage and disposal units. The changes being proposed address Site level security requirements contained in Attachment 3. These changes include updated descriptions of warning signs, surveillance systems and barriers.

DOE is proposing a Class 2 permit modification pursuant to WAC 173-303-830(4)(d)(i). The proposed changes pertain to WAC 173-303-310 security requirements. The permittees' compliance history during the life of the permit being modified is available through Ecology.

#### PUBLIC COMMENT PERIOD

December 10, 2018 February 11, 2019

### GET INVOLVED STAY INFORMED

#### Public Meeting:

January 16, 2019, 5:30 p.m.  
Richland Public Library  
955 Northgate Dr.  
Richland, WA 99352

#### Contact Information:

Kristen Holmes, DOE  
(509) 376 5803  
kristen.l.holmes@rl.doe.gov  
Randy Bradbury, Ecology  
(509) 372 7954  
randy.bradbury@ecy.wa.gov

#### Administrative Record:

<https://go.usa.gov/xP63M>

#### Submit Comments:

<http://wt.ecology.commentinput.com/?id=9eAsZ>



# THE HANFORD SITE

## Class 2 Permit Modification Sequence

As per WAC 173-303-830, "Permit Changes," this Class 2 Permit Modification will go through the required public review process that includes this fact sheet, newspaper advertisement and public meeting.

## Summary of Changes to Attachment 3, Security

Attachment 3 was rewritten to describe Hanford Sitewide Security. Updates include:

- Description of signage, to include Site perimeter signs, Columbia River signs and unit group signs
- Description of the 24-hour surveillance system
- Description of barricades for access control to the 200 Area (Central Plateau)
- Description of perimeter and area fences to include 200 East, 200 West, 300 and 400 areas
- Description of the security personnel and personnel access control
- Photographs of DOE "No Trespassing" sign, Wye Barricade signage (typical for Rattlesnake and Yakima Barricades) and Columbia River signage



*Columbia River Shoreline Signage*



*Columbia River Shoreline Signage*



*Wye Barricade Signage*



*Wye Barricade Signage*

## How to get involved

A 60-day public comment period will run from December 10, 2018 to February 11, 2019. The public meeting is January 16, 2019, 5:30 p.m., Richland Public Library, 955 Northgate Dr., Richland, WA 99352.

To request disability accommodation, please contact Jennifer Colborn, [jennifer\\_m\\_colborn@rl.gov](mailto:jennifer_m_colborn@rl.gov), (509) 376-5840, in our external affairs office at least 10 working days prior to the event. DOE makes every effort to honor disability accommodation requests.

The DOE point of contact is Kristen Holmes, [kristen.l.holmes@rl.doe.gov](mailto:kristen.l.holmes@rl.doe.gov) and (509) 376-3375. The Ecology point of contact is Randy Bradbury, [randy.bradbury@ecy.wa.gov](mailto:randy.bradbury@ecy.wa.gov) and (509) 372-7954.

Please submit comments on the proposed changes by February 11, 2019 via eComments to:

<http://wt.ecology.commentinput.com/?id=9eAsZ>

or mail to: Daina McFadden

Washington State Department of Ecology

3100 Port of Benton Boulevard

Richland, WA 99354

Electronic access to the proposed permit modification and supporting documentation is available on the hanford.gov events calendar (<https://go.usa.gov/xP63M>), and in the [Administrative Record](#) and [Public Information Repositories](#).

## Public Involvement Opportunity

**We want to hear from you on the updates to Attachment 3 (Security) of the Hanford Dangerous Waste Permit.**

**Comment Period:** December 10, 2018 to February 11, 2019

**Public Meeting:** January 16, 2019, 5:30 p.m., Richland Public Library



FROM PAGE 1A

TRUMP

will complete a report of any findings, and it isn't clear that any such report would be made available to Congress. That would be up to the attorney general. Trump on Friday said he would nominate former Attorney General William Barr to the post to succeed Jeff Sessions.

Nadler indicated that Democrats, who will control the House in January, will step up their own investigations. He said Congress, the Justice Department and the special counsel need to dig deeper into the allegations, which include questions about whether Trump lied about his business arrangements with Russians and about possible obstruction of justice.

"The new Congress will not try to shield the president," he said. "We will try to get to the bottom of

this, in order to serve the American people and to stop this massive conspiracy – this massive fraud on the American people."

Schiff, D-Calif., also stressed a need to wait "until we see the full picture." He has previously indicated his panel would seek to look into the Trump family's business ties with Russia.

"I think we also need to see this as a part of a broader pattern of potential misconduct by the president, and it's that broad pattern, I think, that will lead us to a conclusion about whether it rises to the level to warrant removal from office," Schiff said.

In the legal filing the Justice Department stopped short of accusing Trump of directly committing a crime. But it said Trump told Cohen to

make illegal payments to porn actress Stormy Daniels and former Playboy model Karen McDougal, both of whom claimed to have had affairs with Trump more than a decade ago.

In separate filings, Mueller's team detail how Cohen spoke to a Russian who "claimed to be a 'trusted person in the Russian Federation who could offer the campaign 'political synergy' and 'synergy on a government level.'" Cohen said he never followed up on that meeting. Mueller's team also said former campaign chairman Paul Manafort lied to them about his contacts with a Russian associate and Trump administration officials, including in 2018.

Republican Sen. Marco Rubio of Florida called the latest filings "relevant" in judging Trump's fitness for office but said lawmakers need more information to render judgment. He also warned the

White House about considering a pardon for Manafort, saying such a step could trigger congressional debate about limiting a president's pardon powers.

Such a move would be "a terrible mistake," Rubio said. "Pardons should be used judiciously. They're used for cases with extraordinary circumstances."

Sen. Angus King, an independent from Maine and a member of the Senate intelligence committee, cautioned against a rush to impeachment, which he said citizens could interpret as "political revenge and a coup against the president."

"The best way to solve a problem like this, to me, is elections," King said.

FROM PAGE 2A

DEPUTIES

a Tri-City hospital, where he was diagnosed with a concussion. Cole also went to a hospital to be evaluated.

Meanwhile, Perez was taken to a hospital to be medically cleared before going to jail. He allegedly was combative with hospital staff and had to be secured to a gurney.

Two days later, he was interviewed by detectives and admitted using both marijuana and methamphetamine, court documents said.

Perez said "that 'everything went south' because the deputies were not patient in giving him enough time to comply,"

documents said. "He initially stated he didn't recall striking Deputy Garcia in the head with the flashlight, but then stated that he accidentally hit Deputy Garcia with it twice."

Kristin M. Kraemer: 509-582-1531; Twitter: @KristinMKraemer

FROM PAGE 1A

VITALTAG

lab to build it with components already available. The U.S. Department of Energy's lab is operated by Battelle.

The demonstration model straps around a person's chest but they are already working on the second generation of the device, which will be a bendable bar with adhesive on the back that will attach directly to the chest.

It's a solution that arose from pleas from first responders who dealt with more than 180 injured people when two pressure-cooker bombs exploded at the Boston Marathon in 2013.

"They needed something that would more effectively process larger numbers of people and to keep an eye out for people who are rapidly deteriorating, or for people who they thought were in a bad state, but who are stable,"

he said.

Most ambulances carry equipment that can do the same things, but generally only for one or two people at a time, Tietje said.

The price and the size of the new device make it so an ambulance or police car could carry several of them to attach to patients.

This would amplify how much a single team would be able to monitor during an emergency, including bus crashes on a rural highway or in a shelter during a natural disaster.

The way Tietje imagines it, the first person on the scene would attach a VitalTag to every patient.

That information would be broadcast both to the medics on the scene, but also to the hospital. It would even provide people a map of where all of the patients are located.

"If it's dark and it's raining and chaotic, I can look at my phone and tell

it's the person over there on the southeast corner that needs help," he said.

The lab is working with occupational medicine company AnovaWorks to confirm the equipment works, said officials. AnovaWorks runs the lab's healthcare clinic.

Information from those tests will help as the lab find a private company to take the project through its remaining steps.

Work on the device started about a year and a half ago. The laboratory is shopping it around to medical companies who will take it through the remaining steps to bring it to the hands of first responders. This includes getting it approved by Food and Drug Administration.

"To come as far as it has is a testament to the team who have just gone above and beyond the call of duty," Gosink said.

Cameron Probert: 509-582-1402; Twitter: @cameroncprobert



THE HANFORD SITE

Learn About a Hanford Security Update

PUBLIC COMMENT PERIOD: Dec. 10, 2018 – Feb. 11, 2019

The U.S. Department of Energy (DOE) Richland Operations Office is holding a 60-day public comment period to support a Class 2 Permit Modification to the Hanford Dangerous Waste Permit. The proposed modification would update Attachment 3, which addresses security requirements.

The public meeting is January 16, 2019, 5:30 p.m., Richland Public Library, 955 Northgate Drive, Richland, Washington 99352.

Visit <https://go.usa.gov/xPzin> to review details on these proposed changes. Please submit comments by February 11, 2019 in writing to the Washington Department of Ecology, 3100 Port of Benton Boulevard, Richland, WA 99354 or electronically: <http://wt.ecology.commentinput.com/?id=9eAsZ>

Contact DOE's Kris Holmes, [Kristen.L.Holmes@rl.doe.gov](mailto:Kristen.L.Holmes@rl.doe.gov), 509-376-5803 or Ecology's Randy Bradbury, [Randy.Bradbury@ecy.wa.gov](mailto:Randy.Bradbury@ecy.wa.gov), 509-372-7954.

The permittee's compliance history during the life of the permit being modified is available from the Department of Ecology contact person.

To request disability accommodation, please contact Jennifer Colborn, [jennifer\\_m\\_colborn@rl.gov](mailto:jennifer_m_colborn@rl.gov), 509-376-5840 at least 10 working days prior to the event. DOE makes every effort to honor disability accommodation requests.



Learn more about Hanford cleanup at [www.hanford.gov](http://www.hanford.gov)

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**From:** ^TPA  
**To:** [HANFORD-INFO@LISTSERV.ECOLOGY.WA.GOV](mailto:HANFORD-INFO@LISTSERV.ECOLOGY.WA.GOV)  
**Subject:** Upcoming Comment Period for Proposed Modifications to Sitewide Security Requirements  
**Date:** Tuesday, October 30, 2018 2:42:52 PM  
**Attachments:** [image003.png](#)

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## THE HANFORD SITE

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*This is a message from the U.S. Department of Energy*

### **Upcoming Public Comment Period on Proposed Changes to the Hanford Dangerous Waste Permit for Modifications to Sitewide Security Requirements**

The U.S. Department of Energy Richland Operations Office is planning a 60-day public comment period to support a Class 2 Permit Modification to the [Hanford Dangerous Waste Permit](#). The modification proposes changes to Attachment 3, which addresses security requirements.

Updates to Attachment 3 include documentation of the site's 24-hour surveillance system, personnel access requirements, perimeter area fences, barricades, and signage. The signage updates describe the Wye Barricade, no trespassing, perimeter, unit group, and Columbia River signs.

The public comment period is expected to begin in December 2018, with a public meeting planned for January 2019. A summary fact sheet and details of the public meeting will be provided when the comment period begins.

Electronic access to the proposed plan and supporting documentation will be available for review on the Hanford.gov events calendar, and in the [Administrative Record](#) and [Public Information Repositories](#).

Questions? Please contact Kristen Holmes, DOE Richland Operations Office, at [kristen.l.holmes@rl.doe.gov](mailto:kristen.l.holmes@rl.doe.gov).

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**From:** ^TPA  
**To:** [HANFORD-INFO@LISTSERV.ECOLOGY.WA.GOV](mailto:HANFORD-INFO@LISTSERV.ECOLOGY.WA.GOV)  
**Subject:** Learn about a proposed update to the security section of the Hanford Dangerous Waste Permit. Your comments count.  
**Date:** Monday, December 10, 2018 12:14:12 PM  
**Attachments:** [image003.png](#)  
[Attachment 3\\_Fact Sheet\\_11-26-2018 FINAL.pdf](#)

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## THE HANFORD SITE

*This is a message from the U.S. Department of Energy*

### **Comment Period on Proposed Changes to the Hanford Sitewide Security Requirements in the Hanford Dangerous Waste Permit**

The U.S. Department of Energy (DOE) Richland Operations Office is holding a 60-day public comment period from Dec. 10, 2018, to Feb. 11, 2019, for a Class 2 Permit Modification to the Hanford Dangerous Waste Permit. This proposed modification would update Attachment 3, Security.

The proposed updates include documentation of the Hanford Site's 24-hour surveillance system, personnel access requirements, perimeter area fences, barricades, and signage. The signage updates describe the Wye Barricade, no trespassing, perimeter, unit group, and Columbia River signs.

A public meeting will be held Jan. 16, 2019, 5:30 p.m., Richland Public Library, 955 Northgate Dr. Richland, Washington 99352. Please see the attached summary fact sheet. To read the full documentation, please see the Hanford.gov [Events Calendar](#), the [Administrative Record](#) and the [Public Information Repositories](#).

Visit <https://go.usa.gov/xPzjn> to review details on these proposed changes. Please submit any comments by Feb. 11, 2019, by mail to:

Washington Department of Ecology  
3100 Port of Benton Boulevard  
Richland, WA 99354

or electronically at: <http://wt.ecology.commentinput.com/?id=9eAsZ>

For questions, please contact:

Kristen Holmes, DOE, [kristen.l.holmes@rl.doe.gov](mailto:kristen.l.holmes@rl.doe.gov), 509-376-5803  
Randy Bradbury, Washington State Dept. of Ecology, [randy.bradbury@ecy.wa.gov](mailto:randy.bradbury@ecy.wa.gov), 509-372-7954

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

*To request disability accommodation, please contact Jennifer Colborn, [jennifer\\_m\\_colborn@rl.gov](mailto:jennifer_m_colborn@rl.gov), 509-376-5840, in our external affairs office at least 10 working days prior to the event.*

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