DEPARTMENT OF ECOLOGY
State of Washington

Response to Comments

WTP Waste Storage and Transportation Staging Areas

April 1 to May 30, 2019

Summary of a public comment period and responses to comments

July 2019

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Publication and Contact Information

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Response to Comments

WTP Waste Storage and Transportation Staging Areas

April 1 to May 30, 2019

Nuclear Waste Program
Washington State Department of Ecology
Richland, Washington

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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 meetings.

This Response to Comments is prepared for:

Comment period:	WTP Waste Storage and Transportation Staging Areas, April 1 through May 30, 2019
Permit:	*Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 10 (WA7890008967), Waste Treatmen and Immobilization Plant*
Permittee(s):	U.S. Department of Energy (DOE) Office of River Protection and Bechtel National, Inc. (BNI)
Original issuance date:	September 27, 1994
Effective date:	July 31, 2019

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

Reasons for issuing the permit

The purpose of this Class 2 permit modification is to add a Waste Treatment Plant (WTP) Waste Storage Area and a Transportation Staging Area. The WTP Waste Storage Area replaces the non-radioactive dangerous waste storage area to store secondary waste from WTP operations. The Transportation Staging Area is permitted to stage Immobilized Low Activity Waste (ILAW) transporters at the WTP after the ILAW containers have been loaded prior to shipment to the Integrated Disposal Facility on the Hanford Site.

The Dangerous Waste Permit Application Part A Form has been revised to identify both the WTP Waste Storage and Transportation Staging Areas as Container Storage Areas.

Redline changes were made to the following sections of the permit:

- Dangerous Waste Permit Application Part A Form
- Chapter 4 Process Information
- Chapter 4I Balance of Facilities Process Information
- Permit Condition Tables

Also, the engineering specification for the concrete used for the WTP Waste Storage Area was added to Appendix 7.7 of the WTP Permit.

Public involvement actions

The Permittees and Ecology encouraged public comment on this Class 2 permit modification during a 60-day public comment period held April 1 through May 30, 2019.

The following actions were taken to notify the public:

- Mailed a public notice announcing the comment period to 1,282 members of the public.
- Distributed copies of the public notice to members of the public at Hanford Advisory Board meetings.
- Placed a public announcement display advertisement in the *Tri-City Herald* on March 31, 2019.
- Emailed a notice announcing the start of the comment period to the Hanford-Info email list, which has 1,347 recipients.
- Posted the comment period as an event on the Washington Department of Ecology – Hanford's Facebook page.

The United States Department of Energy Office of River Protection held a public meeting on May 8, 2019, at 5:30 p.m. at the Richland Public Library. Two members of the public attended the meeting, and one member joined through webinar.

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

- Public notice (Fact Sheet).
- Transmittal letter.
- Draft WTP Waste Storage and Transportation Staging Areas Permit Modification.

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

- Public notice (Fact Sheet).
- Classified advertisement in the *Tri-City Herald.*
- Notices sent to the Hanford-Info email list.
- Event posted on the Washington Department of Ecology - Hanford Facebook page.

List of Commenters

The table below lists the names of organizations or individuals who submitted a comment on the WTP Waste Storage and Transportation Staging Areas Permit modification. The comments and responses are in Attachment 1.

Commenter	Organization
Bruce Grimm	Citizen
Anonymous	Citizen
Mike Conlan	Citizen
Confederated Tribes of the Umatilla Indian Reservation	Tribal

Attachment 1: Comments and responses

Description of comments:

Ecology accepted comments from April 1 through May 30, 2019. 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 grouped by individual and each comment is addressed separately.

LETTER I-1: BRUCE GRIMM, 4/06/19 12:40 PM PT

Comment I-1-1

Many of the provisions of WAC 173-30 have been carried down since at least 1982 and some sections appear as ancient concepts today. It should be viewed as that since the regulations have been amended and added to from time to time during that long time span the chapters run in danger of becoming an uncorrelated hodgepodge that is confusing not only to industry professionals but the general public.

It is suggested that in defining the terms and establishing the requirements to ensure waste management activities are protective of human health and the environment that they are uniformly used to depict the concept set out in its definition. That is one of the most important skills in efficient drafting of regulations. The draftspersons must first have very definite concepts and then must manifest an ability to employ proper words, phrases, clauses and sentences which clearly convey the scope and limitations of such concepts. Then, these well-delimited concepts, by means of appropriate nomenclature and phraseology, must be uniformly applied throughout the administrative code.

The agency should carefully consider revisions so that they do not create further duplicities, conflicts and ambiguities.

Ecology Response to I-1-1

Thank you for your suggestions, however this comment better applies to changes to the Washington Administrative Code (WAC) regulations and is outside the purview of this modification. This Class 2 modification to the Waste Treatment and Immobilization Plant (WTP) Permit focuses on the permitting and construction of the WTP Waste Storage and Transportation Staging Areas.

LETTER I-2: ANONYMOUS CITIZEN, 4/17/19 12:00 PM PT

Comment I-2-1

The Fact Sheet says that Ecology's approval of this modification "would authorize construction of the WTP Waste Storage Area and Transportation Staging Area. Yet, the fact sheet also says that operations of these container storage areas will be described at some future time in a Class 3 permit modification for the Low Activity Waste and Effluent Management Facility - scheduled to be submitted for public comment later this year. Without an understanding of operations, including doses and chemical compositions, it is impossible for Ecology or the public to determine whether the bases for the design, capacity, and health protections of each area are reasonable.

This disconnect between construction now versus learning the health and safety bases later appears to be an example of wasteful construction executed ahead of having the requirements. It is another artifact of "fast track design-build," which is a violation of DOE Order 413.3B. Even "Dilbert" understands this. Please see the enclosed cartoon from Friday, May 9, 1997, which demonstrates the likely reason for fast track design build.

Ecology Response to I-2-1

The permittees have chosen to follow the WTP phased permitting approach with agreement from the Department of Ecology (Ecology), for addition of the permitted waste storage area. Miscellaneous mixed and dangerous waste managed in the WTP Waste Storage Area is from Low Activity Waste (LAW) operations. These secondary wastes may include but are not limited to spent or failed equipment, high efficiency particulate air filters, and melter consumables. Operating details will be provided in the Class 3 permit modification as stated in the Fact Sheet, as this modification focuses on the permitting of the construction of the storage pad. Doses and chemical compositions were determined in the following reports:

- 24590-WTP-RPT-ENS-10-003, Rev 1, Evaluations of WTP Secondary Mixed Wastes for Dangerous Waste Treatment and Disposal
- 24590-WTP-RPT-ENV-14-006, Rev 0, Updated Evaluation of Secondary Dangerous Waste Treatment and Disposal for 2015 DWP Submittal

Comment I-2-2

For both new facilities, an ALARA study is needed to show whether the long-term storage of waste drums and ILAW containers creates doses that are "as low as reasonably achievable." This should be done before there is any construction. The State of Washington has established enhanced requirements for workers compensation, due to doses to Hanford workers, and therefore has an obligation to help reduce personnel exposures. Interim undefined storage can lead to accumulation of degrading drums and can lead to arguments, as have occurred at the Central Waste Complex regarding labeling and definition of multiple "major" risks that first responders would have to sort through. The administration of additional storage locations is expensive, and the more waste located there, and the longer the waste ages, the more expensive it will be.

Ecology Response to I-2-2

Ecology regulates management of dangerous waste under WAC 173-303. Ecology does not have regulatory authority for management of nuclear operations or the radiological fraction of mixed waste. This authority is maintained by the Department of Energy under the Atomic Energy Act.

The WTP Waste Storage Area will be inspected at least weekly ensuring that all containers are closed and storage area is free of liquid and debris.

Comment I-2-3

Looking at the ILAW Transportation Staging Area (TSA), Table 4I-1 shows that the maximum waste volume in the TSA is 18,095 gallons. System Plans show that approximately 594 gallons of glass occupies each ILAW canister (max before it cools). As a result, it appears that 18,095/594 = 30 ILAW canisters (10 trailers?) is the actual storage capacity. This capacity is stated to be based on having interim storage prior to shipment to the Intermediate Disposal Facility (IDF) which is adjacent to WTP.

Why is storage needed for 30 canisters (about 6 days of production)? The only need for lag storage is to cool the canisters to the extent needed to install them in the bottom layer in the trench. Can you provide the basis? How does this provide for uninterrupted WTP operations? Can you verify that no other waste type (other than ILAW) will be staged in this area for "transportation"?

Ecology Response to I-2-3

This permit modification is specifically for WTP and does not include scope for the Integrated Disposal Facility (IDF). During a WTP outage, it may be necessary to stage large pieces of failed equipment loaded on transporters in the Transportation Staging Area. Assumptions for the Transportation Staging Area are as follows:

- 3 trailer limit
- ILAW container dimensions: 7.5 ft (90 in.) high by 4 ft (48 in.) diameter. Internal Volume = 86.4 ft3 (646 gal)
- Full drum shipment = 88 drums on trailer for 4,840 gal (647 ft3); x3 trailers = 14,520 (1,941 ft3)
- Full load of 5x5x9 boxes (1,683 gal [225 ft3]) = 8,415 gal (1,125 ft3); x3 trailers= 25,245 gal (3,375 ft3)
- Full ILAW trailer, 3 containers = 1,939 gal (259 ft3); x3 trailers = 5,817 gal (778 ft3)
- 1 box shipment (8415 gal) + 2 drum shipments (9,680 gal) = 18,095 gal (2,419 ft3)

Comment I-2-4

Previous WTP dangerous waste permit applications featured an ILAW "Buffer Storage" area to ensure uninterrupted operations (same purpose). See 24590-WTP-DWPA-ENV- 01-001, Rev 1, sheet 4-49. Table 4-2 shows the old ILAW Buffer Storage Area was 89,099 gallons. At one time there was even a Bechtel ILAW buffer storage containment building, per WA 7890008967, Attachment 51, 2/2004. 89,099 gallons translates to 150 ILAW canisters. But I believe this capacity was removed from the WTP baseline. Bechtel may have received fee/payment from DOE for designing it (an inflated need?) and may also have received payment from DOE for deleting it from the project scope to reduce costs. As a result, DOE should be reminded that no fee or incentive should be paid for adding back the ILAW Transportation Staging Area, because its buffer storage function is rework. This is another artifact of fast-track design build, and it causes phased permitting chum as well as design chum.

Ecology Response to I-2-4

Ecology maintains oversight of WTP activities associated with the Dangerous Waste Permit. Ecology is not involved in the oversight of the WTP contract, nor contractual negotiations between the U. S. Department of Energy (DOE) and Bechtel National, Inc. (BNI). In addition, Ecology is not responsible for the decisions that DOE makes as they move forward on projects. If DOE makes decisions that directly affect permitting, Ecology will ensure that necessary details and information are evaluated and appropriately incorporated into the Dangerous Waste Permit.

Comment I-2-5

GAO recently published a report, GAO-189-207, "DOE Should Take Action on Milestone Oversight." This report indicates that DOE has not tracked multiple "renegotiations" and delays of TPA and consent decree milestones, and as a result, those milestones have been ineffective. Ecology should consider tracking DW Permit changes and delays from project inception in the same manner. Comment 4 above is just one example. How many other features of the permit have experienced the same costly chum due to the fast track design-build (in an out of the permit, and scope creep, resulting in costly repeated effort)?

Ecology Response to I-2-5

Ecology regulates management of dangerous waste under WAC 173-303, changes to the Dangerous Waste Permit are tracked through permit modifications. Ecology expects the permittees to meet the Consent Decree dates that they committed to in 2016. In addition, Ecology is not open to extending the Interim Compliance dates that correlate with the Consent Decree for the construction and operation of the Waste Treatment and Immobilization Plant.

The permittees demonstrate their commitment to tank treatment by working with Ecology to regularly monitor progress in the field and working to prepare the facility for compliant operations.

Comment I-2-6

The renamed and expanded WTP Waste Storage Area appears to be intended to be permitted for both radioactive waste and non-radioactive dangerous waste. This looks like an error precursor that could lead to radioactive containers being stored in a wrong location and shipped to an off-site non-radioactive waste disposal vendor/landfill, exposing the public. Ecology should ensure that radioactive and non-radioactive wastes cannot be mingled, to avoid such accidents. Was a hazards analysis conducted to underpin this design? What was the maximum inventory used to determine the hazard category and rigor of safety analysis? Will the BOF or the LAW hazard category be updated? How much Tc-99 will be stored at any one time?

Ecology Response to I-2-6

Separate storage areas within the unit will be clearly marked with signs indicating the appropriate waste to be stored in each area. All containers will be labeled with the accumulation or generation start date, as appropriate, the major risk(s) associated with the waste, and the words “hazardous waste” or “dangerous waste.” A waste tracking and inventory system will also be implemented and labels will be positioned so that required information is visible. The waste storage area is intended to be permitted to store mixed waste per the following reports:

- 24590-WTP-RPT-ENS-10-003, Rev 1, Evaluations of WTP Secondary Mixed Wastes for Dangerous Waste Treatment and Disposal
- 24590-WTP-RPT-ENV-14-006, Rev 0, Updated Evaluation of Secondary Dangerous Waste Treatment and Disposal for 2015 DWP Submittal

In addition, determination of the hazard category for the facilities is the responsibility of the DOE and BNI as a function of their contract and DOE regulations, including the Atomic Energy Act.

Comment I-2-7

Per page 12 of the proposed modification, the WTP waste storage area is not limited to 90 days, but can accumulate waste indefinitely. Page 42 states that this area has a capacity of 4,608 drum equivalents, stacked two high. At 55 gallons per drum, the capacity is 253,440 gallons. The new area is 16 times larger than the nonradioactive dangerous waste area it replaces. And the new capacity is 4.5 times the old capacity. Is there a basis for the increased capacity? Can Ecology provide to the public the mass balance and flow sheet to show the rate of accumulation of drums on this pad? Is there an operations research model? Has the increase cost for construction, permitting and operations been added to the life cycle data?

Ecology Response to I-2-7

The overall intent is not to accumulate waste indefinitely but to stay compliant with regulations for storage of mixed waste. The majority of secondary waste generation will occur with the melter change-outs, which accounts for the increase in size capacity. The focus of this modification is to establish permitted storage for WTP operations per the following reports:

- 24590-WTP-RPT-ENS-10-003, Rev 1, Evaluations of WTP Secondary Mixed Wastes for Dangerous Waste Treatment and Disposal
- 24590-WTP-RPT-ENV-14-006, Rev 0, Updated Evaluation of Secondary Dangerous Waste Treatment and Disposal for 2015 DWP Submittal

Comment I-2-8

What will the dose rates in the ILAW Staging Area and WTP Waste Storage Area be?

Ecology Response to I-2-8

The Department of Energy will maintain dose rates at levels that are protective of human health and the environment. Ecology regulates management of dangerous waste under WAC 173-303. Ecology does not have regulatory authority for management of nuclear operations or the radiological fraction of mixed waste. This authority is maintained by the Department of Energy under the Atomic Energy Act.

Comment I-2-9

DOE and Ecology should not allow the new facilities to become an attractive nuisance, subject to speculative accumulation, including for the potential EMF evaporator bottoms (should they be found to corrode the LAW melters). If received, EMF bottoms should be solidified before receipt for IDF disposal on this pad (and not shipped as liquid as suggested by Ecology in System Plan 8 from WTP to inside the Richland City Limits for treatment). EMF bottoms created by DFLAW create an additional 2 million gallons of liquid waste, per System Plan 8. The Tank Closure and Waste Management EIS requires all of the tank farm low level and low-level mixed waste to be disposed to the IDF, not held for any future purpose. Radioactive waste should be disposed of immediately. The Hanford Site's isolation and elevation over the groundwater was selected for that purpose.

Ecology Response to I-2-9

The Integrated Disposal Facility's (IDF) waste management and the Environmental Impact Statement are not within the scope of this comment period. This comment period is focused on the permitting and construction of the WTP Waste Storage and Transportation Staging Areas.

Comment I-2-10

Hanford seems averse to actual disposal of tank waste, and this culture should stop. Long term interim "storage" adds expense and personnel exposures. No drums of Low-Level waste should be staged for off-site transport. All radioactive waste on the pad should meet the criteria for acceptance in the IDF (including no liquids) as informed by the Performance Assessment. DOE should inform the public and update the EIS if there is any plan to generate or store orphan waste at, or as a result of, WTP or tank farm operations.

Ecology Response to I-2-10

In accordance with the Tank Closure and Waste Management EIS, the secondary waste from WTP will be disposed of at the IDF.

Comment I-2-11

I noticed that the permit modification uses gallons in some places and cubic meters in others. It would help if the units were consistent and if the number of ILAW containers was specified, as that would make it easier to verify compliance.

Ecology Response to I-2-11

Generally the volume of liquid waste is measured in gallons, whereas the volume of solid waste is measured in cubic feet. As a result, the permit modification uses both gallons and cubic meters to define the volumes being managed at the facility. Tank Waste treated at the WTP is measured in gallons of waste and generated ILAW containers are measured for disposal in cubic meters. The conversion factor used to convert from cubic feet to gallons is 7.4805 gal/ft3.

LETTER I-3: MIKE CONLAN, 4/19/19 1:52 PM PT

Comment I-3-1

1. Remove all nuclear waste,
2. Do not allow anymore nuclear waste into the facility,
3. Replace all the single storage tanks,
4. Stop all the nuclear leakage entering the Columbia River

Ecology Response to I-3-1

Ecology is working to ensure that long-term storage, treatment and disposal of the waste is protective of human health and the environment.

The proposed permit changes are not to allow new waste, but to better manage the waste already at Hanford.

Single-shell tanks are not in the scope of this comment period. Ecology does agree the tanks pose a threat. We believe a better approach to addressing it is to remove the waste from the single-shell tanks and put it in the compliant double-shell tanks to prepare for eventual treatment in the

Waste Treatment Plant now being built. The operation of the Low-Activity Waste Facility is a positive step to eventual treatment of tank waste currently stored at Hanford.

Stopping any potential nuclear waste from impacting the Columbia River is not within the scope of the WTP Dangerous Waste Permit. Prevention of groundwater and surface water impacts are addressed in operations associated with other units.

LETTER T-1: CONFEDERATED TRIBES OF THE UMATILLA INDIAN RESERVATION, 5/24/19 11:15 AM PT

Comment T-1-1

4I. 1.2.1 Misc. Mixed Waste and Misc. Non-RAD dangerous waste container
Comment: The proposed WTP Waste Storage Area concrete pad is described as being sloped to drain or remove liquid. In the event of a spill or accident, will the drain lead to an area where the waste can be removed before reaching the sewer system? Since a forklift is said to be routinely moving pallets of material staked two high we believe this will increase the likelihood of a possible spill beyond the portable secondary containment units.

Request: Please verify the drain final collection point and if in the event of a spill the liquid can be isolated. If the drain can't be separated a requirement for this room to be engineered with secondary containment beyond the portable containment is requested.

Ecology Response to T-1-1

The waste storage area is not designed nor intended to provide secondary containment. The majority of wastes managed on the WTP Waste Storage pad are solids not requiring secondary containment. In the rare case that waste requiring secondary containment is stored on the pad, it will be in portable secondary containment meeting requirements of WAC 173-303-630(7), sufficient to hold 10% of all containers in the portable containment or 100% of the largest container, whichever is greater (see Section 4I.1.4.1). The WTP Waste Storage Area will be inspected, at a minimum, on a weekly basis. This inspection will include a check for the presence of liquid in portable secondary containment (Chapter 6A) and if present the liquid will be visually inspected for signs of containment (e.g., oily sheen, color, etc.), pH tested, and survey for radiological contamination. Timely removal of liquids in portable secondary containment to prevent overflow will be completed using hand pumps or similar devices as identified in Section 4I.1.4.6. Disposal decisions will be completed on a case-by-case basis depending on testing results.

Comment T-1-2

4I.1.4.1 Secondary containment system design
Comment: The WTP Storage Area waste secondary containment will only capture 10% of the volume of all containers or the entire volume of the largest container. This means that if a spill occurs that includes two large containers, for instance a forklift accident, then the only containment beyond that point will be the drain. See comment 1.

Request: Please increase the size of the containment structure to exceed the requirements in WAC 173-303-630 or ensure the facility is engineered to isolate possible waste that reaches the drainage point.

Ecology Response to T-1-2

The waste storage area is not designed nor intended to provide secondary containment. The majority of wastes managed on the WTP Waste Storage pad are solids not requiring secondary containment. In the rare case that waste requiring secondary containment is stored on the pad, it will be in portable secondary containment meeting requirements of WAC 173-303-630(7), sufficient to hold 10% of all containers in the portable containment or 100% of the largest container, whichever is greater (see Section 4I.1.4.1). The WTP Waste Storage Area will be inspected, at a minimum, on a weekly basis. This inspection will include a check for the presence of liquid in portable secondary containment (Chapter 6A) and if present the liquid will be visually inspected for signs of containment (e.g., oily sheen, color, etc.), pH tested, and survey for radiological contamination. Timely removal of liquids in portable secondary containment to prevent overflow will be completed using hand pumps or similar devices as identified in Section 4I.1.4.6. Disposal decisions will be completed on a case-by-case basis depending on testing results.

Comment T-1-3

4I.1.4.3 Structural Integrity of the Base
Comment: The base construction states that the base will be free of gaps, cracks, and sufficiently impervious to contain leaks. The area of the storage is designated to be 145'x100x10'. Will this area have a liner placed under the concrete?

Request: Please indicate if a liner will be used under the concrete pad. Also include a description of how this slab will be crack/gap free considering a concrete pad of this size will undoubtedly crack without properly placed control joints. If control joints are used, describe how they will be sealed to prevent leaks.

Ecology Response to T-1-3

The installation of the WTP Waste Storage Area will be verified as compliant with WAC 173-303-630(7)(a), (b), and (c) by a qualified, installation inspector or a qualified registered, professional engineer in accordance with Permit Condition III.10.D.3.b. It will also be inspected weekly when waste is being stored in the area. The WTP Inspection Plan, Chapter 6A, will require that weekly inspections be performed to check that containers are free of liquid and debris. The area will be checked for cracks, gaps, and other signs of deterioration. Problems revealed by inspections will be corrected on a schedule that prevents hazards to public health and the environment.

Appendix A: Copies of all public notices

Public notices for this comment period:

- Public notice (Fact Sheet).
- Classified advertisement in the *Tri-City Herald.*
- Notices sent to the Hanford-Info email list.
- Event posted on the Washington Department of Ecology – Hanford's Facebook page.

THE HANFORD SITE

PUBLIC COMMENT PERIOD

Waste Treatment and Immobilization Plant (WTP) Project
Proposed Construction of New Waste Storage and Transportation Staging Areas

The U.S. Department of Energy (DOE) Office of River Protection (ORP) and Bechtel National, Inc. (BNI) are holding a 60-day public comment period on proposed modifications to the Hanford WTP Dangerous Waste Permit (Permit). The proposed permit change would add a small container storage pad and a Transportation Staging area for the transporters to ship the Immobilized Low Activity Waste (ILAW) containers to the Integrated Disposal Facility (IDF).

PUBLIC COMMENT PERIOD: April 1 to May 30, 2019

Background

The Hanford Site is located in southeastern Washington along the Columbia River. The 580 square-mile site was created in 1943 as part of the Manhattan Project to produce plutonium for the nation's defense program. Today, waste management and environmental cleanup are the main missions at Hanford.

The DOE-ORP and BNI, as co-Permittees, are requesting a Class 2 Modification to the Hanford Facility RCRA Permit; WTP Permit (Operating Unit Group 10).

Overview

The Permit establishes requirements to ensure waste management activities are protective of human health and the environment. DOE is proposing a Class 2 permit modification pursuant to Washington Administrative Code WAC 173-303-830, which requires a 60-day public review process that includes a public meeting, a newspaper advertisement announcing the meeting, and this fact sheet.

Summary of Changes

The purpose of the proposed modification is to add language into the WTP Permit describing a WTP Waste Storage Area and a Transportation Staging Area. The WTP Waste Storage Area will replace the non-radioactive dangerous waste storage area to support operations. Redline changes are proposed to the following sections of the permit; Dangerous Waste Permit Application Part A Form, Chapter 4 Process Information, and Chapter 4I Balance of Facilities Process Information, and updates to the Permit Condition Tables. The engineering specification for the concrete being used for the WTP Waste Storage Area will be added to Appendix 7.7 of the WTP Permit.

PUBLIC COMMENT PERIOD

April 1 to May 30, 2019

GET INVOLVED STAY INFORMED

Public Meeting:

May 8, 2019, 5:30 p.m.
Richland Public Library
955 Northgate Dr.
Richland, WA 99352

Contact Information:

Paula Call, DOE
509 376 2048
Paula.Call@orp.doe.gov

Annette Carlson, Ecology
509 372 7950
anca461@ecy.wa.gov

Administrative Record:

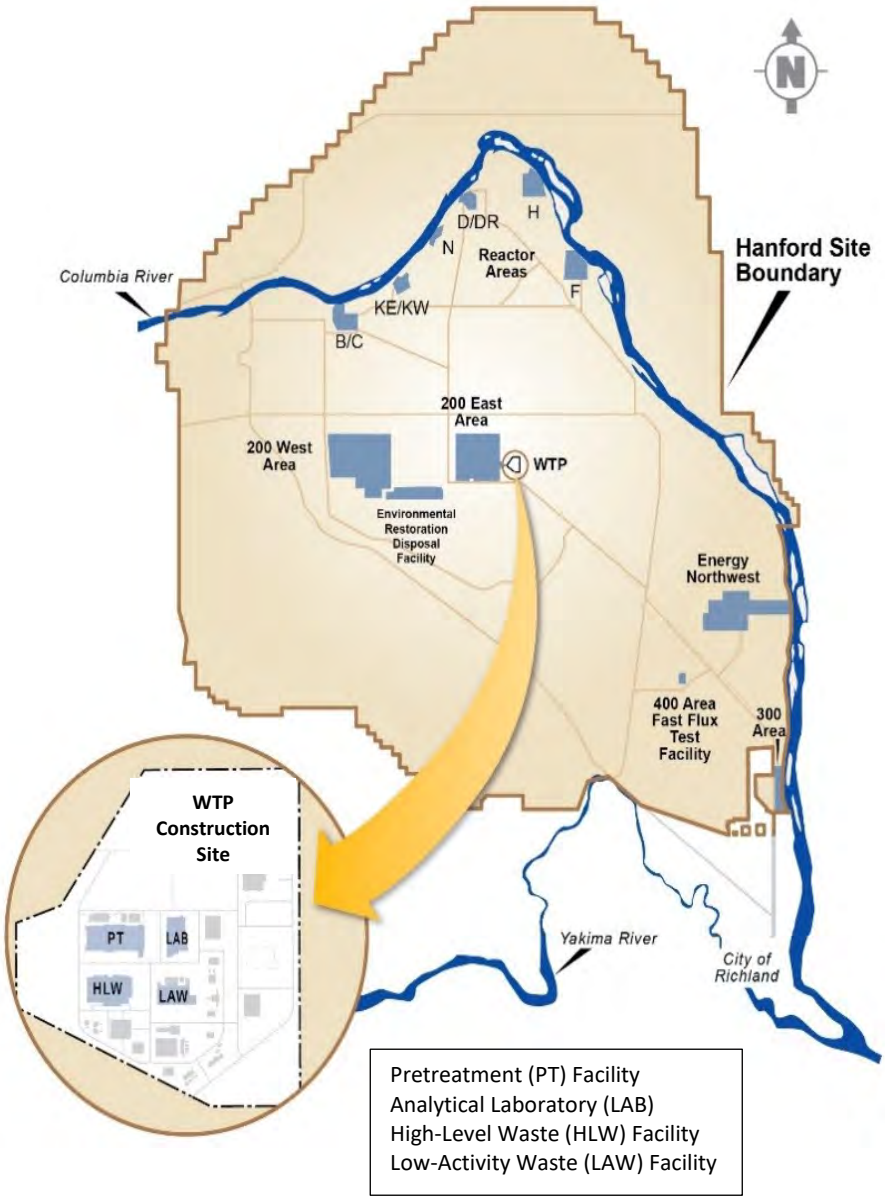
https://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession_0063755H

Submit Comments:

http://wt.ecology.commentinput.com/?id_NSTBg

Ecology approval of this modification would authorize construction of the WTP Waste Storage Area and Transportation Staging Area. Operations of these container storage areas will be described in the Class 3 permit modification for the Low Activity Waste and Effluent Management Facility operations scheduled to be submitted for public comment later this year.

The Dangerous Waste Permit Application Part A Form has been revised to identify the WTP Waste Storage and Transportation Staging Areas as Container Storage Areas. The WTP Transportation Staging Area is being permitted to stage ILAW transporters at the WTP after the ILAW containers have been loaded prior to shipment to the IDF on the Hanford Site.



THE HANFORD SITE

How To Get Involved

A 60-day public comment period is scheduled to begin April 1 and continue through May 30, 2019. A public meeting will be held on May 8, 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, 509-376-5840 at least 10 working days prior to the event.

All comments need to be submitted by May 30, 2019, in writing, by mail, or by email (preferred) to:

Annette Carlson
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, WA 99354
http://wt.ecology.commentinput.com/?id=NSTBg (preferred)

At the conclusion of the public comment period, Ecology will address public comments and prepare a Response to Comment document.

Copies of the proposed modification and supporting documentation will be available during the public comment period online at https://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0063755H, or on Ecology's website at http://www.ecy.wa.gov/programs/nwp/commentperiods.htm. Permit modification may also be viewed at the Hanford Public Information Repositories listed below.

Hanford Public Information Repositories

Portland State University Government Information Branford Price Millar Library 1875 SW Park Avenue Portland, OR 97207-1151 Attn: Claudia Irla (503) 725-4542 E-Mail: westonc@pdx.edu Map: www.pdx.edu/map.html	**University of Washington** Suzzallo Library Government Publications Dept. Box 352900 Seattle, WA 98195-2900 Attn: Hilary Reinert (206) 685-3130 E-Mail: cass@uw.edu; reinerth@uw.edu Map: www.tinyurl.com/m8ebj	**U.S. Department of Energy Public Reading Room** Washington State University, Tri-Cities Consolidated Information Ctr., Rm. 101-L 2770 University Drive Richland, WA 99352 Attn: Janice Scarano (509) 372-7443 E-Mail: doe.reading.room@pnnl.gov Map: www.tricity.wsu.edu/campusmaps/campusmap.pdf	**Gonzaga University** Foley Center Library East 502 Boone Avenue Spokane, WA 99258 Attn: John Spencer (509) 313-6110 E-Mail: spencer@gonzaga.edu Map: www.tinyurl.com/2c6bpm	**Ecology Nuclear Waste Program Resource Center** 3100 Port of Benton Blvd. Richland, WA 93354 Attn: Valarie Peery 509-372-7950 E-Mail: Hanford@ecy.wa.gov Online: http://www.ecy.wa.gov/programs/nwp/commentperiods.htm

Administrative Record and Public Information Repository:

Address: 2440 Stevens Center Place, Room 1101, Richland, WA. **Attn**: Heather Childers

Phone: 509-376-2530 **E-Mail:** heather_m_childers@rl.gov **Web site**: www2.hanford.gov/arpir/

THE HANFORD SITE

FACT SHEET

Public Involvement Opportunity

We want to hear from you on the proposed changes to the Hanford Dangerous Waste Permit for the Waste Treatment and Immobilization Plant Project Waste Storage and Transportation Staging Areas.

Comment Period: April 1 to May 30, 2019
Public Meeting: May 8, 2019, 5:30 p.m.**,** Richland Public Library

OFFICE OF RIVER PROTECTION
United States Department of Energy
Class 2 Permit Modification Fact Sheet
U.S. Department of Energy
Office of River Protection
P.O. Box 450, H4-02
Richland, WA 99352

ON GARDENING

Have you been out-phloxed again?

BY NORMAN WINTER
Tribune News Service

It is happening all across the South right now and probably rates high on the list as one of the saddest moments in the landscape.

It is, of course, when gardeners come to that realization that they have been "Out Phloxed" another year, by their neighbors!

If you are in this category, then now is the time to correct the situation by planting your own phlox.

It is the moss phlox or phlox subulata causing all of the consternation, right now, but there will be others. Phlox subulata or Moss Pink represents one of those "60-mile-per-hour plants," which means pretty flowers in the landscape, diverts your attention while you are zipping down the highway.

Large bold plantings of Moss Pink can do that.

Today it is happening in Old Town in Columbus, Georgia, as drivers slowly pass by a picturesque estate with a dazzling show of more moss phlox than most gardeners have ever seen at one time.

The phlox gets its name from ancient Latin meaning Flame and you certainly have to agree that the Moss Pink brings brilliant color to the late winter or early spring garden. Habit wise it is a low-growing, evergreen plant with a fine, textured leaf. Wonderful on slopes and in rock gardens, it is much more drought- and sun-tolerant than most other phlox.

Next up in the jealousy category is the Prairie Phlox, Phlox pilosa. This one is also called downy phlox and sports a great fragrance.

It is still mostly sold generically by native plant nurseries but a couple of named varieties have been seen in recent years. Buy it whenever you see it! It ranges from 12 to 24 inches in height and comes in a variety of colors.

Lastly giving the spring shout out is the Phlox divaricata known as Louisiana Phlox, Wild Sweet William, Woodland Phlox, and Blue Phlox.

Though called Louisiana Phlox it is native over a huge area from Alaska to Quebec and Minnesota, southward to Texas and then eastward to Florida. The fragrant blooms come in various shades of blue and last six to eight weeks.

If you plant these stalwart spring bloomers then add the old-fashioned summer phlox, you'll find phlox blooming, in some areas, for eight to nine months a year t. I promise you won't be Out Phloxed!

NORMAN WINTER TNS

Moss phlox is one of the best plants that catches your attention.

STEVE RINGMAN Seattle Times

The great room of Eric and Kim's home is lined with an expansive window wall facing Lake Sammamish and all it has to offer. "One day, my mom wanted to see the house, and two eagles were flying right in front of the window," says architect Andrew Finch. "It literally took my breath away."

New lake home represents a process of give-and-take

BY SANDY DENEAU DUNHAM
Seattle Times

KING COUNTY, WASH.

There is harmony here: in alignment and scale, in colors and materials, in the happy banter of an architect and a homeowner singing each other's praises – especially after a complex project involving serious site challenges; highly informed participants; and, ultimately, creatively agreeable tradeoffs.

Actually, there were two architects behind Eric and Kim's gleaming new home on Lake Sammamish. One is Andrew Finch, of Finch Design & Production. The other is Kim herself.

"I have done only health care and always wanted to do a house," she says. "We had a larger home in the Entiat area on Lake Washington. Our last house was a builder house, built in 2000. So many things weren't what I wanted."

STEVE RINGMAN Seattle Times

Architect Andrew Finch of Finch Design & Production worked with SBI Construction on Eric and Kim's new home on this challenging, steep waterfront lot.

The 1940s cabin that previously lived on this idyllic slice of waterfront didn't exactly cut it, either. For one thing, says Finch, "The cabin's water came out of the lake."

The fact that any new house arose here at all should be considered the first critical, mutual victory.

"Before construction could begin, the home underwent an extensive regulatory review because of its location along the shores of Lake Sammamish, and the site having two areas designated as steep slope," says Finch. "(The) soil was so bad that workers stood on sheets of plywood while forming the foundations."

You notice the slope as you stutter-step down the driveway shared by Eric and Kim and their fellow empty-nesters next door. Then, rebalanced at the bottom, you notice nothing but this home: It's textured and smooth, metallic and glassily reflective, nestled and bold, with a shed roof over the one-story garage; a majestic butterfly roof alit on the two-story living area; and an entry hall connecting, and separating, them.

The fact that Eric and Kim's home is this harmoniously stunning should be considered the ultimate win: It's a thoughtful composition of input, insight and experience. Plus a whole lot of give-and-take.

"We had a very clear idea of how we live – how we want to live," says Eric.

"There were days that were collaborative, and some we wanted to kill each other," Kim says of Finch, happily bantering. "Part of the dialogue was that Andrew got used to getting hand-drawn sketches from me – no CAD. Hour by hour, there definitely were some things we disagreed on, but I did value so much Andrew's design expertise. And in some cases, I knew I was right. We each had certain battles we won and ones we lost. The end result is very satisfactory."

Today's tour of gentle give-and-take begins, as tours should, in that welcoming entry hall, reached via an impressive 900-pound, one-piece, 5-by-9-foot pivot door.

"This was a disagreement," says Kim. "Back in the beginning, I didn't know I wanted a pivot door, or whether the structure could support it. ... It's an extremely heavy door; it needs a steel frame for size and movement." It is amazing. "You were right about the pivot door," she says to Finch – adding that she found this particular, more-affordable custom version through a vendor in Tucson.

Of the siding, Finch says, "Kim wanted a no-maintenance exterior. It gives the house more depth." Adds Kim: "That was a win for me."

Downstairs, past a custom stairway that integrates a virtual wall of cabinetry through both levels, "You compromised a little on the bedroom size," Finch says. Adds Kim: "On this level, to get two bedrooms and two bathrooms, everything is a little undersized. The upstairs is big. It's a trade-off."

In the master bathroom, glass doors open to the toilet and to the shower. "Andrew won this one," Kim says. "I wanted translucent all the way to the top, but the light comes in so much better through the clear. It makes the room feel so much bigger. Great call."

In the kitchen, part of the light-filled, lofty-ceilinged, glass-walled great room, Kim says, "I wanted a secondary table, to stand up." A precisely centered island fits the bill perfectly. "With this island, it's much more pleasant to face each other," Finch says. "She was right."

Off the great room, Eric's office looks through glass pocket doors to more than 20 windows framing the lake. "One of my goals was to get Eric's office on the water," says Kim. "We couldn't do it, but this isn't too bad."

Celebrating the kitchen, the heart of the home

BY KATIE LAUGHRIDGE
Tribune News Service

In my house, we sleep in the bedrooms, relax in the family room, and we live in the kitchen. It is the meeting place after a long day and the hub of activity during a weekend at home. When hosting guests, I find myself entertaining more and more from my modestly sized kitchen. Even though we don't intend to host by the oven, as house layouts trend increasingly toward open concepts, the kitchen is no longer a hidden room for immediate family. Instead, it has become a shared space for all who visit.

I have found bringing decor and design into the kitchen a challenging but fun experience. Here are a few tips and tricks to keep in mind when decorating your kitchen.

Design up, not out: Counter space is a hot commodity in my house. Somehow when I cook, it seems to take up the entire room. I have found that decorating upward in tiers instead of outwards has allowed me to incorporate more of the decor I love into my kitchen without hindering my meal prep.

Lean into kitchen art: Wall space in the kitchen can be limited due to appliances and cabinets, but that shouldn't discourage you from incorporating art into the room. Whether it's above the oven, over the sink or on the countertop itself, there is always a place for art.

Put a tray on display: Decorative dishes, fashionable tea towels, colorful produce – let us see it! If you have available counter space, don't hide potential decor elements behind a cabinet door. Gather your best kitchen items and display them expertly on a fun tray for an instant and classic vignette moment.

Customize your furniture: A great way to soften your space is with custom upholstery at the island our dining nook. Is there a favorite fabric from your living room sofa, or perhaps a chair from your entryway that you love? Bring that color or pattern in by customizing seating to coordinate with the rest of your home.

Incorporate fun lighting: Overhead lighting is a great way to bring your personal style into a space. Play up your kitchen lighting and make it standout with a fixture. Not only does a hanging light feature pop over an island countertop or dining nook, there are unlimited options to make the perfect statement for your kitchen.

From:	^TPA
To:	HANFORD-INFO@LISTSERV.ECOLOGY.WA.GOV
Subject:	30-day Advance Notification: Upcoming Public Comment Period on Proposed Changes to the Hanford WTP Dangerous Waste Permit
Date:	Wednesday, February 27, 2019 9:48:55 AM

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

Notice of Public Comment Period on Proposed Changes to the Hanford WTP Dangerous Waste Permit

The U.S. Department of Energy Office of River Protection (ORP) is planning a 60-day public comment period to support a requested Class 2 permit modification to the Hanford Waste Treatment and Immobilization Plant (WTP) Dangerous Waste Permit. This modification is requesting approval from the Washington State Department of Ecology (Ecology) to install a new permitted waste container storage area and a new transporter staging area in support of WTP operations.

The public comment period is expected to start in March, with a public meeting scheduled for April.

Copies of the proposed modification and supporting documentation will be available during the public comment period at the Hanford Administrative Record Public Information Repository located at 2440 Stevens Drive, Richland, WA, and online at http://pdw.hanford.gov/arpir/.

Additional information on the proposed permit modification will be available on Ecology's website, the Hanford Public Information Repositories, and other document review locations when the public comment period begins.

Questions? Please contact Abi Zilar, ORP, at abigail_j_zilar@orp.doe.gov, or Dan McDonald, Ecology, at dmcd461@ecy.wa.gov.

Ecology logo

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From:	^TPA
To:	HANFORD-INFO@LISTSERV.ECOLOGY.WA.GOV
Subject:	Comment period begins today for proposed changes to the Hanford WTP Dangerous Waste Permit
Date:	Monday, April 1, 2019 10:05:42 AM
Attachments:	image003.png Fact Sheet for WTP Waste Storage and Transportation Staging Areas vFinal.pdf

THE HANFORD SITE

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

Notice of Public Comment Period on Proposed Changes to Hanford's Waste Treatment and Immobilization Plant (WTP) Dangerous Waste Permit

The US Department of Energy (DOE) Office of River Protection is holding a 60-day public comment period to support a requested Class 2 permit modification to the Hanford WTP Dangerous Waste Permit. This modification is requesting approval from the Washington State Department of Ecology (Ecology) to install a new permitted waste container storage area and a new transporter staging area in support of WTP operations.

The public comment period is April 1 through May 30, 2019 with a public meeting May 8, 2019. The public meeting will be held May 8, 2019, 5:30 p.m., Richland Public Library, 955 Northgate Dr. Richland, Washington 99352. To read the full documentation, please see the Hanford.gov Events Calendar, the Administrative Record and the Public Information Repositories.

If you can't attend the meeting in person, join via the webinar.

Registration URL: https://attendee.gotowebinar.com/register/906724756226749452
Webinar ID: 687-052-315

Attached is a summary fact sheet, or you can visit https://go.usa.gov/xEJF6 to review details on these proposed changes. Please submit comments by **May 30, 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=NSTBg

Questions? Please contact Paula Call, DOE at paula.call@orp.doe.gov or Annette Carlson, Ecology at anca461@ecy.wa.gov.

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

To request disability accommodation, please contact Jennifer Colborn, Jennifer_M_Colborn@rl.gov, 509-376-5480, in our external affairs office at least 10 working days prior to the event. DOE makes every effort to honor disability accommodation requests.

Ecology logo

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From:	^TPA
To:	HANFORD-INFO@LISTSERV.ECOLOGY.WA.GOV
Subject:	Reminder: Public meeting tomorrow on proposed changes to the Hanford WTP Dangerous Waste Permit
Date:	Tuesday, May 7, 2019 10:14:59 AM
Attachments:	image002.png Fact Sheet for WTP Waste Storage and Transportation Staging Areas vFinal.pdf

THE HANFORD SITE

Notice of Public Comment Period on Proposed Changes to Hanford's Waste Treatment and Immobilization Plant (WTP) Dangerous Waste Permit

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The public comment period is April 1 through May 30, 2019 with a public meeting May 8, 2019. The public meeting will be held tomorrow, May 8, 2019, 5:30 p.m., Richland Public Library, 955 Northgate Dr. Richland, Washington 99352. To read the full documentation, please see the Hanford.gov Events Calendar, the Administrative Record and the Public Information Repositories.

If you can't attend the meeting in person, join via the webinar.

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WE WANT TO HEAR FROM YOU!
Washington Department of Ecology - Hanford
Published by Decology McFadden [?]
Page Liked · April 1
The US Department of Energy Office of River Protection is holding a 60-day public comment period on proposed modifications to the Hanford WTP Dangerous Waste Permit. The proposed permit change would add a small container storage pad and a Transportation Staging area for the transporters to ship the Immobilized Low Activity Waste containers to the Integrated Disposal Facility.
For more information on modification: https://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0063755H
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