



Response to Comments
Capsule Interim Storage Permit
Modification
(8C.2018.1D)

November 4 to December 20, 2019

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

February 2020

Publication no. 20-05-008

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Response to Comments

***Capsule Interim Storage Permit Modification
(8C.2018.1D)***

November 4 to December 20, 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 hearings.

This Response to Comments is prepared for:

Comment period:	Capsule Interim Storage Permit Modification (8C.2018.1D) November 4 to December 20, 2019
Permit:	<i>Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 19 (WA7890008967), Capsule Interim Storage</i>
Permittee(s):	<i>U.S. Department of Energy Richland Operation Office</i>
Expected issuance date:	February 20, 2020
Draft effective date:	March 21, 2020

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 modification

Currently 1,936 capsules storing radioactive cesium chloride and strontium fluoride salts are stored in pools at the Waste Encapsulation and Storage Facility (WESF). The permittees separated these salts from Hanford tank waste from 1967 to 1985 to reduce the temperature of storage tanks.

The cesium chloride is contained in 1,335 capsules and the strontium fluoride is contained in 601 capsules. The cesium chloride and strontium fluoride salts also include heavy metals such as lead, chromium, and cadmium as contaminants. These contaminants make the material mixed waste.

Response to Comments
Capsule Interim Storage Permit Modification

This permit modification authorizes construction of a new facility, the Capsule Interim Storage (CIS) operating unit group, to replace the current pool storage at WESF. CIS will have one dangerous waste management unit, the Capsule Storage Area (CSA).

Within the CSA, 25 cask storage systems (CSSs) will hold the capsules. The CSS design of a multi-layered steel Transportable Storage Container protected by a concrete cask to provide radiation shielding, waste protection, and cooling through passive air ventilation.

Transferring the capsules from WESF to CIS will provide increased safety and resiliency. At WESF, active cooling and water circulation dissipates the heat generated by capsules. WESF is beyond its 30-year design lifespan, and the concrete pool cell walls show signs of deterioration due to radiation exposure. This deterioration is not yet an emergency, but would likely progress if capsule storage continued long-term. If an event, such as an earthquake, breached the pool cell walls it might leave the capsules uncooled and unshielded.

Transferring the capsules to dry storage also eliminates the risk of power loss or equipment failure impacting the cooling system at WESF. The cesium and strontium salts have gone through at least one half-life since placement in the pools and show reduced activity and heat generation. The capsules are still too hazardous for currently available treatment or disposal options, but the storage casks can now provide sufficient shielding and cooling. This will limit the potential for spread of contamination to soil, groundwater, and surface water.

Moving these capsules is also essential to initiate cleanup and closure of WESF and B Plant. Although the capsules will still be on site at Hanford, CIS will have a much smaller physical and environmental footprint than existing facilities. This transfer advances the overall goal of Ecology and the permittees to clean and restore the Hanford Site.

Public involvement actions

Ecology encouraged public comment on the Unit Group Specific Conditions, CIS Part A Form, and all CIS Part B addenda during a 45-day public comment period held November 4 through December 20, 2019.

Ecology took the following actions to notify the public:

- Mailed a public notice announcing the comment period to 1230 members of the public. Copies of the public notice were distributed to members of the public at Hanford Advisory Board meetings.
- Placed a public announcement legal classified notice in the *Tri-City Herald* on November 3, 2019.
- Emailed a notice announcing the start of the comment period to the [Hanford-Info email list](#), which has 1334 recipients.
- Posted the comment period as an event on the [Washington Department of Ecology – Hanford Facebook page](#).

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
- Statement of Basis for the proposed CIS Permit Modification
- Draft CIS Permit Modification
- Supplemental Information Supporting the 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
- 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 Capsule Interim Storage Permit modification. The comments and responses are in [Attachment 1](#).

Commenter	Organization
Byron Countryman	<i>Citizen</i>
Mike Conlan	<i>Citizen</i>
Gordon Smith	<i>Citizen</i>
Judy Pigott	<i>Citizen</i>
Department of Energy – Richland Operations	<i>Permittee</i>
CH2M Hill Plateau Remediation Company	<i>Permittee</i>

Attachment 1: Comments and responses

Description of comments:

Ecology accepted comments from November 4 through December 20, 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.

I-1: BYRON COUNTRYMAN

Comment I-1-1

- What is the expected life of the Capsule Storage Units and what is the expected life or half-life of the radioactive capsules being stored? - What monitoring will be implemented to ensure the safety and security of the Capsule Storage Units?

Response to I-1-1

Tri-Party Agreement Major Milestone M-092-00 requires a permanent storage, treatment/processing, or disposal solution for the capsules be completed by December 31, 2047. This gives the Capsule Storage Area a maximum expected use period of approximately 50 years. To support this, the Capsule Storage Area and Vertical Concrete Casks were designed with a minimum design lifespan of 100 years for critical components. Certain components, such as the entire Transportable Storage Canister assembly, have significantly longer design lifespans due to the rugged and durable materials used.

The primary sources of radiation in the capsules are strontium-90 and cesium-137, which have respective half lives of 28.8 and 30.17 years. The capsules have been stored for more than one half life but will be significant sources of radiation for several hundred years. This lifespan is a primary factor in the decision to require a permanent solution prior to the capsules becoming safe to handle.

Throughout the process of transferring capsules the permittees will continuously monitor radiation, pool cell temperature, and pool cell level backed up by visual observation and inspections. The primary assembly processes will occur in secured areas that are designed for remote handling and containment of the capsules and their contents. The WESF itself is also secured facility within a secured site.

Once the Vertical Concrete Cask systems are within the Capsule Storage Area (CSA), the permittees will monitor outlet vent temperatures to ensure capsules are being properly cooled. This will be backed up by visual inspections to ensure that foreign material does not accumulate on the inlet and outlet vents. The CSA is also a secured storage location within a secured site.

I-2: MIKE CONLAN

Comment I-2-1

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

Mike Conlan, Redmond WA

Response to I-2-1

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.

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

I-3: GORDON SMITH

Comment I-3-1

For the full text of this comment, please see Appendix B. This comment expressed very significant concern with the use of concrete to store dangerous waste in terms of porosity, durability, and difficulty of repair. This comment also noted the lack of apparent progress at the Hanford site, supporting a permanent solution to prevent additional contamination.

Response to I-3-1

Ecology agrees that uncoated concrete can absorb and potentially allow migration of dangerous wastes. Ecology has ensured that this waste will not directly contact concrete in the Capsule Interim Storage (CIS) Operating Unit Group. The cesium and strontium salts are already sealed in stainless steel capsules which will not be opened prior to transfer. These capsules will be grouped together and packaged with two additional sealed layers of stainless steel to create Transportable Storage Canisters (TSCs).

The TSCs will be housed in concrete casks to provide radiation shielding and an additional layer of physical protection for the stainless steel. Concrete is a more practical outer shielding layer to reduce exposure for workers who might need to enter CIS, but concrete will not be used to contain waste.

I-4: JUDY PIGOTT

Comment I-4-1

I'm writing to comment on the Proposed Coordinated Closure Changes to the Tri-Party Agreement of the Hanford Site.

My strong input is that no matter which agency or law is in charge or operating, the decisions reached should be to support the SAFEST (often most costly, but not always) choice. Over many years it has been true that proposals have been made to delay classification, look to waste storage/evaporation/sludge removal to solve serious issues related to contaminant spread, or to assume that taking later action will prove better. I reject these approaches, and hope that interim storage will not be implemented except where it's in support of a fully funded and currently undertaken approach to full clean up. The Capsule Interim Storage Operating Unit 19, being added to the Site-wide Permit sounds pretty good.

Thank you — Judy

Response to I-4-1

Ecology agrees that safety, both for human health and the environment, is critical for the Hanford Site. Capsule Interim Storage will be an improvement over the current storage system at the Waste Encapsulation and Storage Facility. However, Ecology will continue to require that a permanent solution for the long term storage or ultimate treatment and/or disposal of the capsules is established implemented.

Tri-Party Agreement Major Milestone M-092-00 requires a more permanent storage, treatment/processing, or disposal solution be completed by December 31, 2047. To support this, Milestone M-092-20 requires an evaluation of disposition pathways every four years, with the first report due March 31, 2022.

A-1: DEPARTMENT OF ENERGY - RICHLAND OPERATIONS

Comment A-1-1

Capsule Interim Storage permit modification 1. Permit Section: Permit Conditions, Unit Description Comment Text: These salts [cesium chloride and strontium fluoride] contain several dangerous waste-designated metals estimated at less than 10% by weight each as contaminant. Basis Text: As written, this sentence can be interpreted as each metal is less than 10% or there is less than 10% metals total. Capsule impurities, as described in Addendum B, Waste Analysis Plan, show variability in results within each capsule and should not be summarized within the Permit Conditions, which could result in incorrect conclusions. Recommendation Text: Recommend deletion of cited text. 2. Permit Section: Permit Conditions, Definitions Comment Text: A Transportable Storage Canister or "TSC" is the combination of sealed stainless steel shell, Transportable Storage Canister Basket, Universal Capsule Sleeves, capsules, and spacers in a configuration described in Addendum C Section C2.1. Basis Text: Per Addendum C, Process Information Section C2.2, the Cask Storage System (CSS) consists of the Universal Capsule Sleeve (UCS), Transportable Storage Canister (TSC) and TSC Basket, and Vertical Concrete Cask. The UCS is a separate component of the CSS and should be identified individually. Standard, Type W, and spacer capsules are not credited as part of the CSS and should not be included in the TSC description. Recommendation Text: A Transportable Storage Canister or "TSC" is the combination of a sealed stainless steel shell and Transportable Storage Canister Basket. Twenty-two Universal Capsule Sleeves or "UCS" can be inserted into the storage space inside a TSC. A Universal Capsule Sleeve or "UCS" is a sealed stainless steel shell capable of holding up to six standard capsules or two Type W overpacks. Stainless steel capsule spacers may be loaded into a UCS to take the place of a capsule.

Response to A-1-1

Ecology has made the recommended revisions with one slight change to use "UCSs" as the pluralized abbreviation. The referenced language was intended to provide a general overview of the cesium and strontium salts as well as the Capsule Storage System. These revisions will improve clarity in the final permit.

B-1: CH2M HILL PLATEAU REMEDIATION COMPANY

Comment B-1-1

1. Permit Section: Permit Conditions, Unit Description Comment Text: These salts [cesium chloride and strontium fluoride] contain several dangerous waste-designated metals estimated at less than 10% by weight each as contaminant. Basis Text: As written, this sentence can be interpreted as each metal is less than 10% or there is less than 10% metals total. Capsule impurities, as described in Addendum B, Waste Analysis Plan, show variability in results within each capsule and should not be summarized within the Permit Conditions, which could result in incorrect conclusions. Recommendation Text: Recommend deletion of cited text. 2. Permit Section: Permit Conditions, Definitions Comment Text: A Transportable Storage Canister or "TSC" is the combination of sealed stainless steel shell, Transportable Storage Canister Basket, Universal Capsule Sleeves, capsules, and spacers in a configuration described in Addendum C Section C2.1. Basis Text: Per Addendum C, Process Information Section C2.2, the Cask Storage System (CSS) consists of the Universal Capsule Sleeve (UCS), Transportable Storage Canister (TSC) and TSC Basket, and Vertical Concrete Cask. The UCS is a separate component of the CSS and should be identified individually. Standard, Type W, and spacer capsules are not credited as part of the CSS and should not be included in the TSC description. Recommendation Text: A Transportable Storage Canister or "TSC" is the combination of a sealed stainless steel shell and Transportable Storage Canister Basket. Twenty-two Universal Capsule Sleeves or "UCS" can be inserted into the storage space inside a TSC. A Universal Capsule Sleeve or "UCS" is a sealed stainless steel shell capable of holding up to six

standard capsules or two Type W overpacks. Stainless steel capsule spacers may be loaded into a UCS to take the place of a capsule.

Response to B-1-1

Ecology has made the recommended revisions with one slight change to use "UCSs" as the pluralized abbreviation. The referenced language was intended to provide a general overview of the cesium and strontium salts as well as the Capsule Storage System. These revisions will improve clarity in the final permit.

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
- Event posted on Washington Department of Ecology – Hanford’s Facebook page

Hanford Site Dangerous Waste Permit Modification for Capsule Interim Storage



Public comment period

November 4 to December 20, 2019

Please submit comments

Electronically (preferred) via:

<http://nw.ecology.commentinput.com/?id=CpErH>

By U.S. Mail, or hand-delivery:

Daina McFadden
3100 Port of Benton Blvd
Richland WA 99354

Public hearing

A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, contact:

Daina McFadden
509-372-7950
Hanford@ecy.wa.gov

Special accommodations

To request ADA accommodation including materials in a format for the visually impaired, call Ecology at 360-407-6831 or visit <https://ecology.wa.gov/accessibility>.

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

Public comment invited

The Washington State Department of Ecology (Ecology) invites you to comment on a draft permit modification to the *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Revision 8c* (Site-wide Permit).

This modification would add a new operating unit group, Capsule Interim Storage Operating Unit 19, to the Site-wide Permit.

The permittees are:

U.S. Department of Energy Richland Operations Office
PO Box 550
Richland, Washington 99352

CH2M HILL Plateau Remediation Company
PO Box 1600
Richland, WA 99352

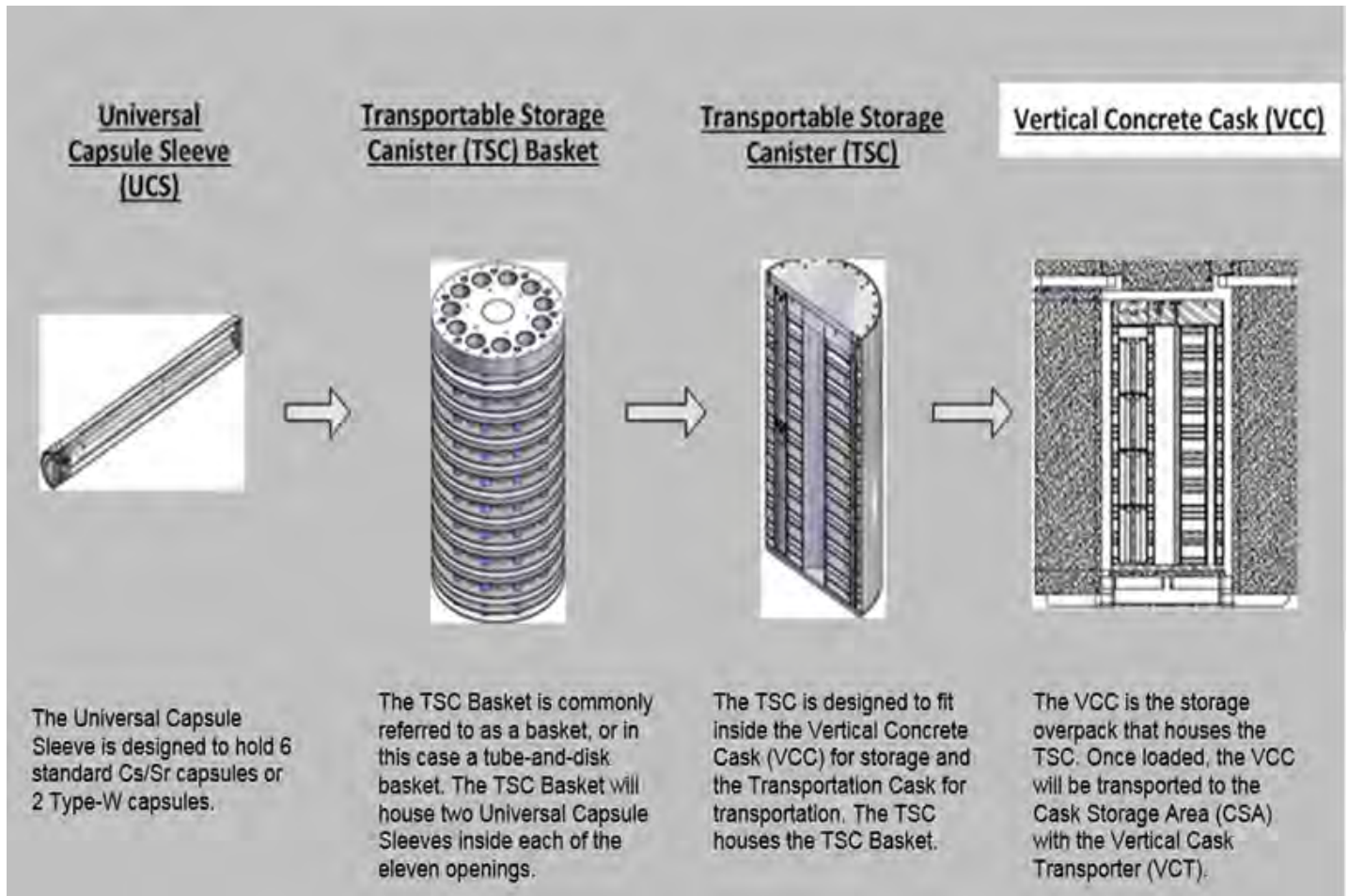
Ecology invites you to comment on this proposed permit modification. The public comment period begins November 4, 2019, and ends December 20, 2019.

Modification overview

Currently 1,936 capsules storing radioactive cesium chloride and strontium fluoride salts are stored in pools at the Waste Encapsulation and Storage Facility (WESF). The permittees separated these salts from tank waste from 1967 to 1985 to reduce the temperature of storage tanks.

The process of separating also recovered small amounts of heavy metals such as lead, chromium, and cadmium. This mixed waste is now contained in double-walled stainless steel capsules and stored under water for cooling and radiation shielding.

The permittees have requested a permit modification to construct a new Capsule Interim Storage (CIS) operating unit group to replace the current pool storage at WESF. CIS would contain the Capsule Storage Area (CSA) dangerous waste management unit. Within the CSA, 25 cask storage systems would hold capsules in cylindrical casks approximately 10 feet in diameter by 11 feet tall. Each cask storage system would be constructed of concrete and steel to provide radiation shielding, waste protection and containment, and sufficient cooling through passive air ventilation.



Capsule Storage System Design

Why capsule transfer matters

Transferring the capsules from WESF to dry storage will provide increased safety and resiliency. At WESF, active cooling and water circulation is needed to dissipate the heat generated by capsules. WESF is beyond its 30-year design lifespan and the concrete pool cell walls show signs of deterioration due to radiation exposure. A spill or release would create a significant volume of contaminated water to clean. If the pools were breached in an event such as an earthquake, the capsules would be left uncooled and unshielded.

Transferring the capsules to dry storage also eliminates the risk of power loss or equipment failure impacting the cooling system at WESF. The cesium and strontium salts have gone through at least one half-life since being placed into pool storage, and they show reduced activity and heat generation. The capsules are still extremely hazardous, but can be safely shielded and cooled in storage casks.

In an emergency, such as a significant earthquake, the potential for spread of contamination to soil and groundwater is more limited in dry storage than it would be in pool storage.

Moving these capsules is also essential to initiate cleanup and closure of WESF and B Plant. Although the capsules will still be on site at Hanford, Capsule Interim Storage will have a much smaller physical and environmental footprint than existing facilities. This transfer advances the overall goal of Ecology and the permittees to clean and restore the Hanford Site.

Why capsules will be retained on site

Currently there are no viable alternatives to continued storage of the cesium and strontium capsules at the Hanford Site. There are no facilities in the United States permitted to treat or permanently store this material. Therefore, continued interim storage in a manner protective of human health and the environment is the only current option.

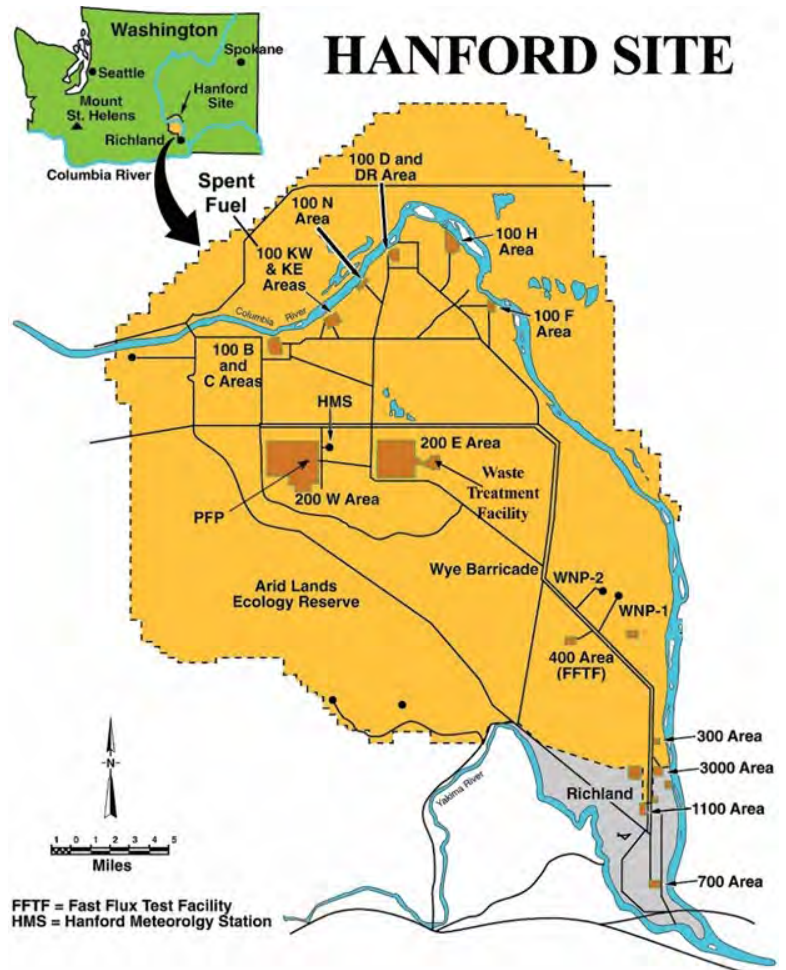
The permittees must continue to periodically evaluate more permanent disposition options under the Hanford Federal Facility Agreement and Consent Order. When an option is available, the cesium and strontium capsules will be treated and/or stored permanently at a different facility.

Reviewing the proposed changes

Ecology invites you to review and comment on this proposed permit modification for the Capsule Interim Storage Operating Unit Group. See Page 1 for comment period dates and information on how to submit comments.

Copies of the application for the proposed modification and supporting documentation will be available during the public comment period online at Ecology’s website on the [Public Comment Period page](#). The documents will also be available at the Hanford Public Information Repositories listed on the last page.

Ecology will consider and respond to all comments received during the public comment period. We will document our responses and issue a response to comments document when we make our final permitting decision.





DEPARTMENT OF
ECOLOGY
State of Washington

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

Hanford's Information Repositories and Document Review Locations

Washington

Richland

Ecology Nuclear Waste Program
Resource Center
3100 Port of Benton Blvd.
Richland, WA 99354
509-372-7950

U.S. Department of Energy
Administrative Record
2440 Stevens Drive, Room 1101
Richland, WA 99354
509-376-2530

Washington State University Tri-Cities
Department of Energy Reading Room
2770 Crimson Way, Room 101L
Richland, WA 99354
509-375-7443

Seattle

University of Washington
Suzzallo Library
P.O. Box 352900
Seattle, WA 98195
206-543-5597

Spokane

Gonzaga University
Foley Center
502 E Boone Avenue
Spokane, WA 99258
509-313-6110

Oregon

Portland

Portland State University
Millar Library
1875 SW Park Avenue
Portland, OR 97207
503-725-4542

From: [McFadden, Daina \(ECY\)](#)
To: HANFORD-INFO@LISTSERV.ECOLOGY.WA.GOV
Subject: Capsule Interim Storage permit modification 30-Day Advance Notice
Date: Friday, October 4, 2019 11:25:25 AM

Capsule Interim Storage permit modification 30-Day Advance Notice

The Washington State Department of Ecology is providing notification of a 45-day public comment period starting early to mid-November 2019. This modification would add a new operating unit group, Capsule Interim Storage (CIS) Operating Unit 19, to the *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Revision 8c* (Site-wide Permit).

The permittees are the U.S Department of Energy Richland Operations Office and CH2M HILL Plateau Remediation Company. The CIS operating unit would be located on the Hanford Site in southeastern Washington.

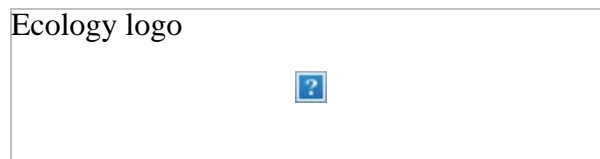
What Changes are Being Proposed?

The permittees have requested a permit modification to construct a new CIS operating unit group to replace the current pool storage at the Waste Encapsulation and Storage Facility. CIS would contain the Capsule Storage Area dangerous waste management unit.

Public Hearing

A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, contact:

Daina McFadden
Hanford@ecy.wa.gov
509-372-7950



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From: [McFadden, Daina \(ECY\)](#)
To: HANFORD-INFO@LISTSERV.ECOLOGY.WA.GOV
Subject: 45-day public comment period starts today!
Date: Monday, November 4, 2019 11:52:17 AM

Capsule Interim Storage Permit Modification Public Comment Period Notification

The Washington State Department of Ecology is providing notification of a 45-day public comment period starting November 4 through December 20, 2019. This comment period will address proposed modifications to the *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Revision 8c (Site-wide Permit)*. This modification would add a new operating unit group, Capsule Interim Storage Operating Unit 19, to the Site-wide Permit. The Permittees are the U.S. Department of Energy, Richland Operations Office and CH2M Hill Plateau Remediation Company. The Capsule Interim Storage area will be located on the Hanford Site in southeastern Washington.

What Changes are Being Proposed?

The permittees have requested a permit modification to construct a new Capsule Interim Storage (CIS) operating unit group to replace the current pool storage at the Waste Encapsulation and Storage Facility (WESF). CIS would contain the Capsule Storage Area (CSA) dangerous waste management unit. A maximum of 25 cask storage systems (CSS) could be stored within the CSA. Each CSS is approximately 10 feet in diameter by 11 feet tall and constructed of concrete and steel to provide radiation shielding, waste protection and containment, and sufficient cooling through passive air ventilation. More information is available on Ecology's [Public Comment Page](#).

How to Comment

Ecology invites you to review and comment on this proposed Capsule Interim Storage permit modification. Copies of the proposed modification are located in the [Administrative Record](#) and the [Information Repositories](#).

Please submit comments by **December 20, 2019**.

[Electronically](#) (preferred):

Mail or hand-deliver to:

Daina McFadden

3100 Port of Benton Blvd

Richland WA 99354

Fax 509-372-7971

Public Hearing

A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, contact:

Daina McFadden

Hanford@ecy.wa.gov
509-372-7950

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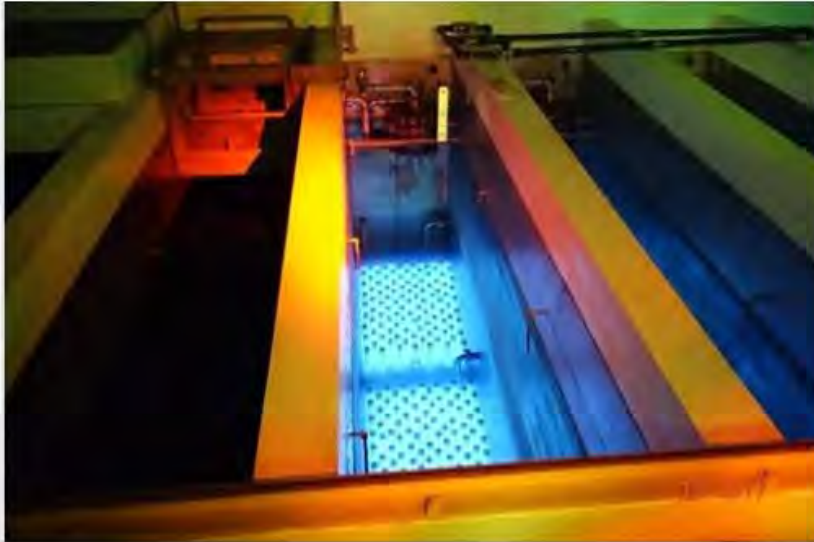
Washington Department of Ecology - Hanford

Published by Ryan Ecology Miller [?] · 2 mins · 🌐

A new public comment period held by agency began today, regarding cesium and strontium capsule interim storage.

The U.S. Department of Energy and CH2M Hill Plateau Remediation Company requested a permit modification to construct a new Capsule Interim Storage operating unit group to replace current pool storage at the Waste Encapsulation and Storage Facility on the Hanford Site.

Read more about the comment period and provide your input here: <https://ecology.wa.gov/.../Nuclear-was.../Public-comment-periods>.

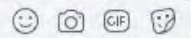


Boost Post

Like Comment Share

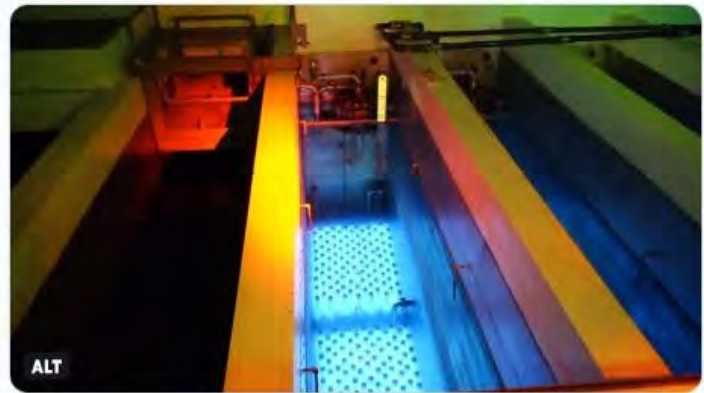


Write a comment...



Ecology - Hanford @ecyHanford · 47s

A new public comment period held by our agency began today, regarding cesium and strontium capsule interim storage. Read more about the comment period and provide your input here: ecology.wa.gov/Waste-Toxics/N... @EcologyWA @EPAnorthwest @HanfordSite @RiverProtection #Hanford #Cleanup



🗨️ 🔄 ❤️ 📤 📑

Appendix B: Full Text of Public Comment I-3-1

11/4/19

Dear Permittees -

I've been watching & reading of the clean up progress at Hanford since the 1980's - I'm extremely disappointed at the apparent progress - This letter is an objection in the extreme to the scheme in Publication # 19-05-017 Nov 2018 -

Exposing this level of waste in a concrete tank is a very bad idea - Concrete is porous, prone to cracks from stress and is not easily repairable - These Tanks Will Fail!! - sooner than later - & no one will want to deal with them - plus it will be contaminated when it does - use something else and mostly do something permanent - What's I RAN planning to do with their waste? - I'm watching the Xsens

Really - no concrete! -

thanks

Gordon Churnith
8029 Mevickian N
Seattle 98103