Response to Comments Effluent Treatment Facility Supplemental Organic Treatment permit modification

June 23 – Aug. 22, 2021

For the **Nuclear Waste Program**

Washington State Department of Ecology

Richland, Washington

October 2021, Publication 21-05-025

DEPARTMENT OF ECOLOGY
State of Washington

Publication Information

This document is available on the Department of Ecology's website at:
https://apps.ecology.wa.gov/publications/summarypages/2105025.html

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

Cover photo credit

- Photo by Washington State Dept. of Ecology, July 26, 2020

Contact Information

Amena Mayenna, Environmental Engineer
Nuclear Waste Program
3100 Port of Benton Blvd
Richland, WA 99354
Phone: 509-372-7950
Email: Hanford@ecy.wa.gov

Website[1]: Washington State Department of Ecology

ADA Accessibility

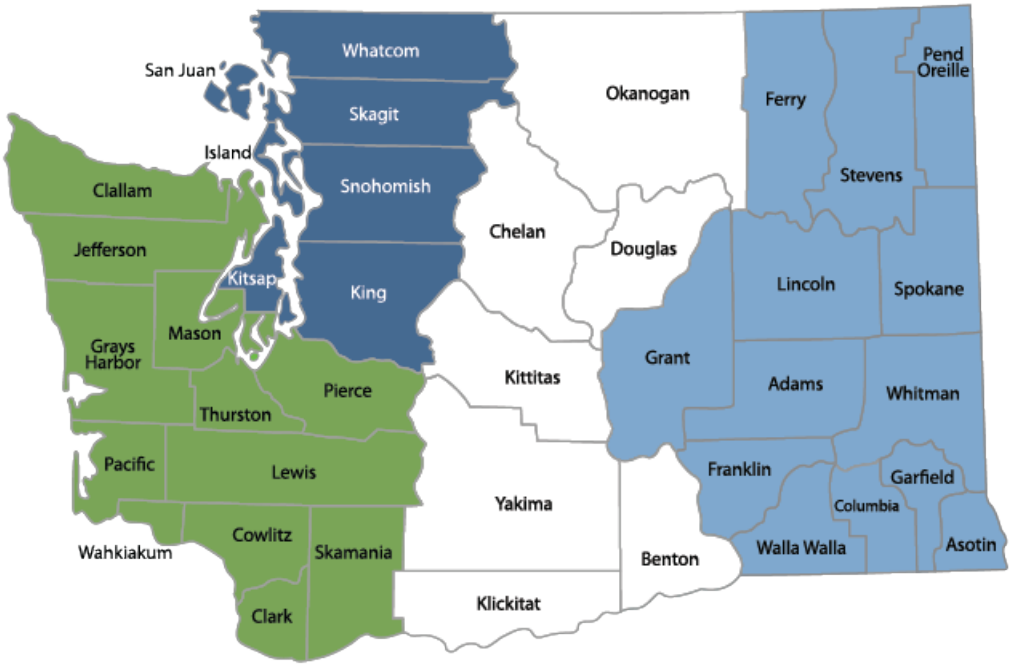
The Department of Ecology is committed to providing people with disabilities access to information and services by meeting or exceeding the requirements of the Americans with Disabilities Act (ADA), Section 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

To request an ADA accommodation, contact Ecology by phone at 509-372-7950 or email at Daina.McFadden@ecy.wa.gov. For Washington Relay Service or TTY call 711 or 877-833-6341. Visit Ecology's website for more information.

[1] www.ecology.wa.gov/contact

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region 360-407-6300	Northwest Region 425-649-7000	Central Region 509-575-2490	Eastern Region 509-329-3400

Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	3190 160th Ave SE Bellevue, WA 98008	425-649-7000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

Response to Comments
Effluent Treatment Facility Supplemental Organic Treatment permit modification

June 23 – Aug. 22, 2021

Nuclear Waste Program
Washington State Department of Ecology
Richland, WA

October 2021 | Publication 21-05-025

DEPARTMENT OF
ECOLOGY
State of Washington

Table of Contents

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	Effluent Treatment Facility Supplemental Organic Treatment permit modification, June 23 – Aug. 22, 2021
Permit	*Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste*, Part III, Operating Unit Group 3, Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility (Permit)
Permittees	*U.S. Department of Energy (USDOE)*
Original Issuance date	Jan. 28, 1998
Effective date	Oct. 23, 2021

To see more information related to the Hanford Site and nuclear waste in Washington, please visit our webpage, Hanford Cleanup[2].

[2] https://www.ecology.wa.gov/Hanford

Reasons for Issuing the Permit

The proposed Class 2 permit modification affects the Liquid Effluent Retention Facility (LERF) and the 200 Area Effluent Treatment Facility (ETF) portion of the Permit. The changes to the Permit will install a supplemental organic-waste treatment system at the 200 Area ETF in support of tank waste treatment operations.

Public Involvement Actions

USDOE invited public comment on the Effluent Treatment Facility Supplemental Organic Treatment permit modification during a 60-day public comment period held June 23 through Aug. 22, 2021.

The following actions were taken to notify the public:

- Mailed a public notice announcing the comment period to 1,108 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 June 23, 2021.
- Emailed a notice announcing the start of the comment period to the Hanford-Info email list, which has 1,282 recipients.
- Posted the comment period notice on the Washington Department of Ecology –Hanford's Facebook and Twitter pages.

USDOE held a virtual public meeting 5:30pm July 22, 2021. Fifty-five 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:

- Fact sheet
- Transmittal letter
- Draft LERF/ETF Permit Modification

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

- Fact sheet
- Classified advertisement in the Tri-City Herald
- Notices sent to the Hanford-Info email list
- Notices posted on the Washington Department of Ecology – Hanford's Facebook and Twitter pages

List of Commenters

The table below lists the names of organizations or individuals who submitted a comment on the OUG 3, Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility Permit modification. The comments and responses are in Attachment 1.

Commenter	Organization
Anonymous Citizen	Citizen

Attachment 1: Comments and Responses

Description of comments:

Ecology accepted comments from June 23 through Aug. 22, 2021. This section provides a 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.

I-1: ANONYMOUS CITIZEN

Comment I-1-1

Permit condition III.3 .J.9 states: "Prior to processing waste through the steam stripper system, the Permittees must provide to Ecology the treatment and disposal pathway for the concentrated acetonitrile distillate secondary waste stream." I do not believe a permit should be allowed for construction when there is an unknown disposal path and unknown risks/costs, and with additional constituents present in the waste also unknown. This new waste stream is another example of waste proliferation from WTP (another is the accumulation of loaded cesium ion exchange columns from LA WPS). Can Ecology provide a list of the total volume of waste going into WTP and the total volume of effluents/concentrates/brines/leachates/cesium columns going out?

Response to I-1-1

The treatment and disposal pathway for the concentrated acetonitrile distillate secondary waste stream will be part of another permit modification and the public will have the chance to review it. Ecology will ensure the concentrated acetonitrile waste stream is treated, stored and disposed of at an approved facility and in full compliance with dangerous waste regulations and applicable permits in a manner fully protective of human health and the environment.

Regarding the total volume of waste going into WTP and total volume of effluents/concentrates/brines/leachates/cesium columns going out is out of scope for this permit modification. However, information on the WTP Facility and the waste going into WTP can be found in the permit located on Ecology's website at ecy.wa.gov.

Comment I-1-2

Addendum B.12, Section B.2.2.2 states: "For a waste stream with organic concentrations higher than the delisting treatability envelope, the 200 Area ETF can be configured to operate the steam stripper to remove organics not effectively destroyed in the UV /OX unit. "The proposed permit omits information that the treatability envelope is incomplete, and will be edited as time goes along (plans are in progress to add constituents). This was made clear in the recent delisting petition update. Again - why grant a permit when the work is not done and the risks are not understood?

Response to I-1-2

In promulgating significant revisions to the 200-ETF delisting in 2005 (70 FR 44498) Ecology and EPA explicitly intended to broadly expand the waste streams that the ETF could process within the scope of the treated effluent delisting. More specifically, the final delisting rule stated:

"The effect of these changes is to allow the 200 Area ETF to fulfill an expanded role in supporting Hanford Facility cleanup actions beyond those activities considered in the 1995 delisting rulemaking. In particular, these changes will allow the 200 Area ETF to treat mixed wastewaters from a number of additional sources beyond 242–A Evaporator process condensate (PC) upon which the original delisting was based." (See 70 FR 44497)"

Consistent with this objective, the 2005 delisting modifications established a detailed mechanism based on the concept of a treatability envelope, which defines the ability of the ETF system overall to treat a wide range of waste constituents. This mechanism is based on an engineering model of the various unit operations within the ETF treatment train. Additionally, constituent-specific data for a wide range of constituents were used on a waste-stream specific basis to evaluate the treatability of that waste stream as part of the waste acceptance process for the ETF. A target goal with this approach was to establish a delisting framework that could consider future waste streams for which characterization data was not available at the time, but could be managed in the future. More importantly, Ecology and EPA noted as part of the 2005 action:

"Since Energy could not reasonably provide detailed characterization of wastes streams that have yet to be generated, EPA proposed a waste acceptance framework based on an engineering evaluation of waste streams. This model provides a degree of confidence that treatment in the 200 Area ETF will meet delisting exclusion limits to the same degree of confidence as if detailed waste stream characterization were available, while avoiding the need to frequently revise the delisting rule itself." (See 70 FR 44499)"

Liquid effluents from the Waste Treatment Plant are one example of wastes that, in 2005, were expected to be generated in the future, but were not sufficiently characterized to be evaluated at that time. Since the 2005 modifications, the Department of Energy has made considerable efforts in both the design and operation of the planned WTP, including a detailed characterization of the liquid effluents from the WTP through engineering design and modelling. From this work, Energy identified a number of constituents in WTP liquid effluent that would need to be considered in the context of the ETF delisting. Most of these constituents are well within the treatability envelope and can easily be accommodated within the delisting framework.

As documented in its request for a modification of the 200 Area ETF delisting, Energy identified that acetonitrile exceeded the existing treatability envelope for that constituent. Based on the information provided by Energy for the current proposed delisting modification, and the overall structure and content of the 2005 modifications to the delisting, EPA and Ecology have determined that with the current proposed modifications, the 200-Area ETF is fully capable of accepting reasonably expected liquid effluents from the WTP, and that there is little if any regulatory, environmental, or project risk associated with WTP liquid effluents that would warrant future modifications of the 200 Area ETF delisting.

Comment I-1-3

Addendum B.24 states: "A secondary waste from the primary treatment train is generated from operation of the steam strippers. This waste stream is condensate from the stream stripper overheads. This waste stream will be transferred to an authorized dangerous waste facility for additional treatment." Also Addendum C.13 states: "The distillate from steam stripping, containing essentially all acetonitrile present, will be accumulated prior to treatment at an offsite permitted treatment, storage, and disposal facility." I believe Ecology should insist that any selected "dangerous waste facility" be located on the Hanford Site. Tank related liquid waste including the acetonitrile concentrate should not be shipped to Penna-Fix Northwest, for

example, due to its poor performance record and proximity to the groundwater and Richland residents. Any dangerous waste facility used should be required to have an up to date EIS and current (non-expired) dangerous waste permit and these are not true of PFNW. Further, the composition of the distillate is unknown due to the absence of an integrated WTP/EMF pilot plant. What is the expected overall composition? How much tritium and other isotopes will be present? DOE should not be pushing WTP design and operability risks on the public by relying on PFNW. The combined radioactive and chemical risks should always be presented together, so that conditions are clearly stated.

Response to I-1-3

Regarding risks of treating ETF secondary wastes at an off-site facility, Ecology will ensure that all such wastes are treated, stored and disposed at an approved facility and in full compliance with dangerous waste regulations and applicable permits in a manner fully protective of human health and the environment.

The concern that the "composition of the distillate is unknown due to the absence of an integrated WTP/EMF pilot plant", Ecology acknowledges that the current proposed ETF delisting rule modification changes are based on projections, not full-scale operations or demonstration testing. With respect to acetonitrile, the proposed changes to the delisting rule are specifically targeted to ensuring an implementable mechanism is in place. This will allow demonstration testing as necessary, to expand the treatability envelope for acetonitrile. As discussed more fully in the 2005 delisting modification action, the current 200-Area ETF delisting is explicitly structured to accommodate new constituents – where such new constituents are within the treatment capacity of ETF (as reflected in the waste-stream specific waste processing strategy required by the delisting rule). New constituents can be accepted for treatment in the 200 Area ETF without modification of the delisting. For new constituents that would require changes to a treatability envelope, the new demonstration testing mechanism in the current delisting proposal would be applied.

Regarding the amount of tritium and other isotopes present in the distillate, the permittees have estimated radionuclide composition of the generated acetonitrile distillate using existing flowsheet analysis models to support internal waste management planning and safety evaluations. Radionuclides that may be present in the waste stream are not subject to regulation under RCRA as they fall under the authority of the Atomic Energy Act. Therefore, information on radionuclides was not necessary for the permit modification.

Comment I-1-4

Addendum C.56 states: "Additional organics compounds will be emitted when the stream stripper is in operation. The emissions are described in NOC-ENV-5503. The emissions fractions were determined using process simulation software." How was the process simulation software validated, when there is no integrated pilot plant data for comparison?

Response to I-1-4

Emissions fractions were determined using the Chemstations™ CHEMCAD™ process simulation software as part of developing the mass and energy balance calculations for the project. Design inputs for the calculation, including appropriate Henry's Law Constants and constituent vapor

pressures, are reflected in RPP-CALC-64269, which was included as supporting information for the permit modification. CHEMCAD is a commercially available off the shelf software that utilizes accepted engineering principles and materials properties in its calculation methodology. Its use for this project was validated in accordance with the design engineer's approved software quality assurance procedures.

Comment I-1-5

Addendum C.74 Primary Treatment train diagram. The diagram in this figure identifies "vitrification tanks." Shouldn't these be labeled "verification" tanks?

Response to I-1-5

The figure has been corrected.

Comment I-1-6

Effluent Treatment Facility Acetonitrile Steam Stripping System Modification Traveler MT-50529 states: "Contaminant levels for Tritium and/or other expected radionuclides shall be confirmed and/or determined during the design process." Is the design process not complete? The radionuclide content is important and relevant, given that DOE is trading acetonitrile risk for tritium risk, per the radioactive air emissions notice of construction. Sometimes the rad content and the chemical content cannot be easily separated into Ecology scope and Department of Health scope, and sometimes the risks have synergy. Please provide the entire "expected" composition for chemicals and radionuclides, since the design should be complete before construction begins.

Response to I-1-6

The design of the steam stripper system is essentially complete, subject to refinements that naturally occur during the final fabrication and field installation process. Construction activities have not yet been initiated. MT-50529 is an initial requirements reference prepared to support the procurement and design process for the project. The modeled waste stream characterization data for planned WTP liquid effluents that will be transferred to LERF/ETF for treatment included both chemicals and radionuclides. Radionuclide composition was not a factor in steam stripper design, but did impact evaluation of materials and supported the permitting processes.

Comment I-1-7

Page 3-20 states: "The purpose of the first stage 60K-CO-001 Steam Stripper is to strip acetonitrile, acrylonitrile and other minor constituents from a waste water stream (influent) generated by upstream facility operations. The waste stream from 60K-CO-001 is condensed and pumped to the second stage 60K-CO-201 Concentrator to strip acetonitrile, acrylonitrile and other minor constituents from the waste stream. Contrary to the page 3-20 statement about other constituents present, the maximum concentrations in Table 3-2 show that all other constituents are zero. If the maximum evaluated is zero, shouldn't the acceptance criteria also be zero in the LERF basins? Acetone exists in tank waste. N-NitrosoD is not defined. Separations are generally not 100% perfect, as is implied here. Can you clarify the data?

Table 3-2. Maximum Bounding Process Stream Constituents.

Constituent Stream 302 Distillate to Distillate Storage Tank wt%

Water 98

Acetonitrile 2

Acrylonitrile 0

Acetone 0

N-NITROSOD 0

Air 0

Reference: H-2-839048

Response to I-1-7

Stream 302 is the effluent from the output of the 60K-CO-201 concentrator to the distillate storage tank. Table 3-2 is from the materials compatibility report, RPP-RPT-62550, included as supporting information for the permit modification. The values in the table have been rounded to the nearest whole percentage for presentation purposes. They are not intended to imply 100% perfect separation in the steam stripper. The specific values from the referenced source document are as follows:

Constituent Wt%
Water 97.7001%
Acetonitrile 2.29640%
Acrylonitrile 0.00335%
Acetone 0.00005%
N-Nitroso 0.00003%
Air 0.00007%

These values are modeled output of the steam stripper system and are not related to the LERF acceptance criteria.

Comment I-1-8

The steam stripper is designed to cycle 10 times per year, but I could not find a total of the acetonitrile produced by WTP. What is the total mass of acetonitrile expected to be accumulated from WTP per year at ETF? According to the delisting petition this information should be available based on the amount projected to be created by incomplete combustion in the WTP LAW melters.

Response to I-1-8

The waste stream characterization data for the WTP liquid effluents that will be transferred to LERF/ETF for treatment shows a projected acetonitrile concentration of approximately 32 mg/L and a projected volume of approximately 5.4 million gallons. Although these are modeled nominal values, a simple calculation using those values results in an estimated total acetonitrile mass of approximately 653 kg/year transferred to ETF in the WTP liquid effluent stream. The

steam stripper was designed to accommodate a feed input of 60 mg/L, providing capacity for variability in the WTP liquid effluent stream characterization.

Comment I-1-9

It appears that the current proposal is solely to address an acetonitrile steam stripper, but there are other unknowns and chemicals of concern to be addressed "later." There is no guarantee that there will be a future capability to treat future unknowns, leaving a considerable risk of what to do with non-compliant effluents from the WTP.

Response to I-1-9

Ecology has determined that (based on their review of the information provided by Energy regarding new constituents associated with the WTP) the methodology used by the permittees in developing this information is sound and defensible. There is no substantial risk of unidentified constituents appearing in WTP liquid effluents that would preclude acceptance of such wastes for treatment at the 200 Area ETF. Based on evaluation of the projected characterization of WTP liquid effluents planned for treatment at LERF/ETF, it has been determined that addition of a steam stripper is sufficient to allow ETF to treat the anticipated liquid effluents to meet regulatory limits. Although the primary focus of the steam stripper design is to ensure effective treatment of acetonitrile that existing ETF processes can't perform, the steam stripper will also remove other organic constituents that remain in the effluent after passing through those other treatment processes. LERF/ETF has a large degree of flexibility to process liquid effluents of differing characteristics by adjusting operating strategies and throughput. New information or issues identified at a later date will be addressed at that time.

Appendix A. Copies of All Public Notices

Public notices for this comment period:

- Fact sheet
- Classified advertisement in the Tri-City Herald
- Notices sent to the Hanford-Info email list
- Notices posted on Washington Department of Ecology – Hanford's Facebook and Twitter pages

THE HANFORD SITE

PUBLIC COMMENT PERIOD
Class 2 Permit Modification to the Hanford Dangerous Waste Permit

Fact Sheet

GET INVOLVED

Comment Period
June 23 – Aug. 22, 2021

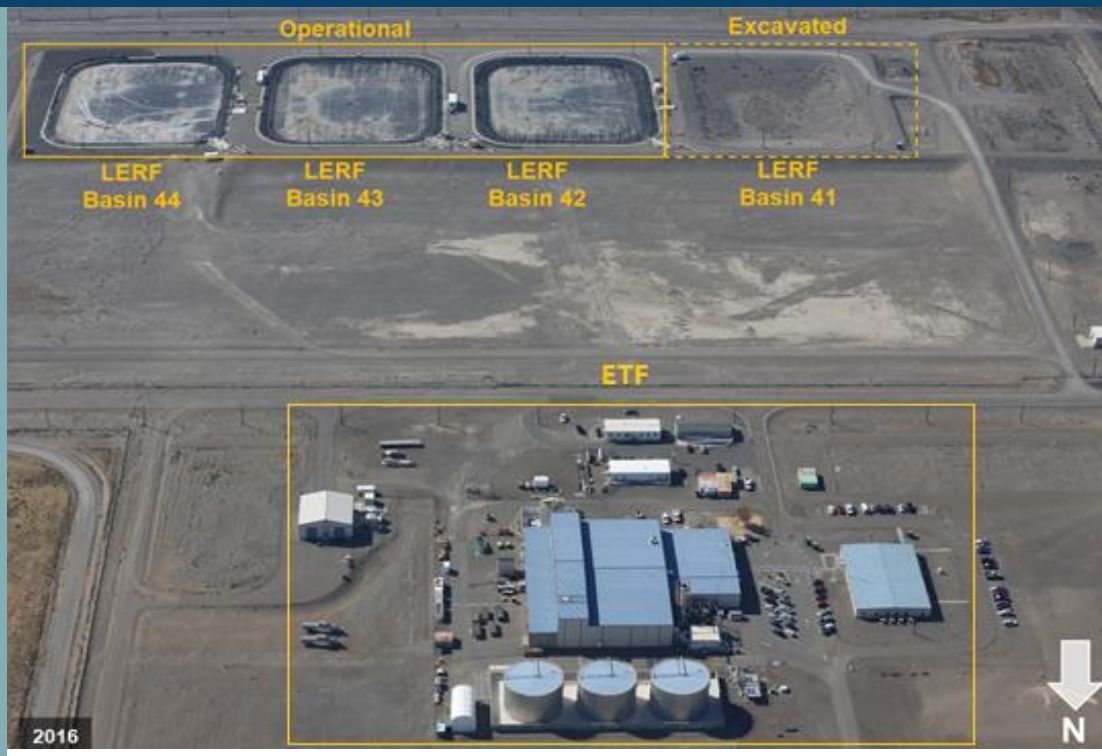
Virtual Public Meeting
July 22, 5:30 p.m.
(see details on page 3)

Send comments by Aug. 22 to
http://nw.ecology.commentinput.com/?id=MWf3Y

Administrative Record:
https://go.usa.gov/xHt6z

Contact Information
Jennifer Colborn
(509) 528-6687
Jennifer_M_Colborn@rl.gov

Daina McFadden, Ecology
(509) 372-7950
Hanford@ecy.wa.gov



The U.S. Department of Energy is holding a 60-day public comment period on a proposed Class 2 permit modification to the Hanford Dangerous Waste Permit, Liquid Effluent Retention Facility (LERF) and 200 Area Effluent Treatment Facility (ETF) chapter. This proposed permit modification is required to install a supplemental organic-waste treatment system at ETF.

ETF is located near the center of the Hanford Site and will process liquid waste from the Waste Treatment and Immobilization Plant in support of the Direct-Feed Low-Activity Waste approach to treating tank waste. The new organic-waste treatment system will supplement other treatment systems at ETF to ensure discharges of treated liquids from the facility meet requirements for disposal at the State Approved Land Disposal Site at Hanford.

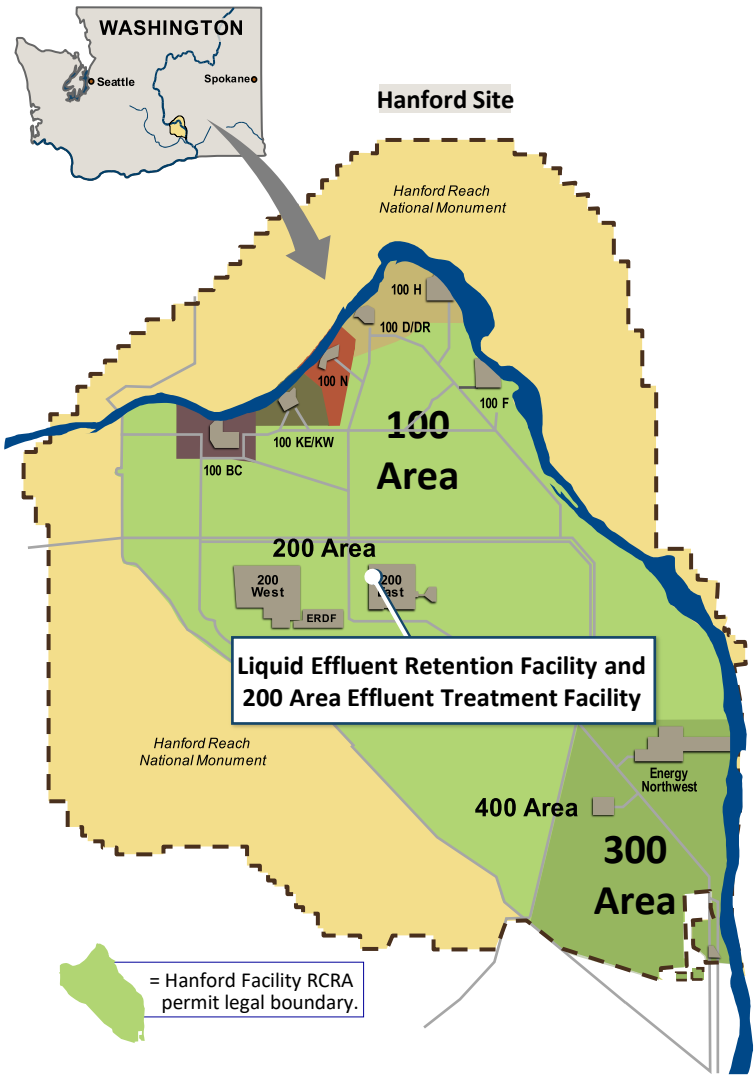
Outside the 200 Area Effluent Treatment Facility

PUBLIC COMMENT PERIOD
Class 2 Permit Modification to the Hanford Dangerous Waste Permit

Background

The Hanford Site is located in southeastern Washington state 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 and its contractor Washington River Protection Solutions are requesting a Class 2 modification to the LERF and 200 Area ETF operating unit group of the Hanford Dangerous Waste Permit. The LERF and 200 Area ETF are mixed-waste treatment and storage units for treating liquid effluents from Hanford cleanup facilities. These facilities include the 242-A Evaporator and the Waste Treatment and Immobilization Plant's Effluent Management Facility (when it becomes operational) to support treating tank waste using the Direct-Feed Low-Activity Waste approach (see map).



Overview

The Hanford Dangerous Waste Permit establishes requirements to ensure that waste management activities protect human health and the environment. DOE is proposing a Class 2 permit modification pursuant to WAC 173-303-830, which requires a 60-day comment period, a public meeting, a newspaper notice, and a mailing list notice. This fact sheet is the mailing notice.

Summary of Changes

If approved, the modification would allow DOE to install a supplemental organic-waste treatment system at the 200 Area ETF in support of tank waste treatment operations.

Permit Chapters Affected by this Modification

- Permit Conditions
- Addendum B, Waste Analysis Plan
- Addendum C, Process Information
- Addendum I, Inspection Requirements

PUBLIC COMMENT PERIOD
Class 2 Permit Modification to the Hanford Dangerous Waste Permit

Public Involvement

A 60-day public comment period will begin June 23, 2021, and continue through Aug. 22. A virtual public meeting will be held July 22, 2021 at 5:30 p.m. PT, and will include a presentation introducing the LERF and 200 Area ETF permit modification.

During the virtual meeting, you can view the presentation, hear the speakers and ask your questions. To participate, please follow the instructions below:

Visual (presentation only):
Click the GoToWebinar link: https://bit.ly/2RFLQZm;
ID #: 759-306-107

Audio:
1. Dial (509) 372-3087 (local) or (800) 664-0771 (long distance)
2. Enter Conference ID: 1333#

All comments must be submitted by Aug. 22, 2021, in writing, by mail or electronically (preferred) to:

Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, WA 99354
http://nw.ecology.commentinput.com/?id=MWf3Y (preferred)

At the conclusion of the public comment period, the Washington State Department of Ecology will address public comments and issue a final permit.

Copies of the proposed plan and supporting documentation will be available online during the public comment period on the Hanford public involvement website at https://go.usa.gov/xVmew, in the Administrative Record at https://go.usa.gov/xHt6z, and in the Hanford Public Information Repositories at https://go.usa.gov/xVDTS.

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

Please contact Jennifer Colborn, at Jennifer_M_Colborn@rl.gov or (509) 528-6687, at least 10 working days prior to the event to request disability accommodation. DOE makes every effort to honor disability accommodation requests.

Jennifer Colborn
P.O. Box 450, H6-60
Richland, WA 99352

Daina McFadden, Ecology
3100 Port of Benton Boulevard
Richland, WA 99354

THE HANFORD SITE

PUBLIC COMMENT PERIOD
Class 2 Permit Modification to the Hanford Dangerous Waste Permit

Public Involvement Opportunity

We want to hear from you.

ONE HANFORD

Comment Period:

June 23 – Aug. 22, 2021
Public Meeting: July 22, 2021 at 5:30 p.m. PT

Class 2 Permit Modification Fact Sheet
U.S. Department of Energy
P.O. Box 450, H6-60
Richland, WA 99352

ALEX BRANDON AP

Vice President Kamala Harris stands in an elevator as the Senate prepares for a key test vote Tuesday on the For the People Act, a sweeping bill that would overhaul the election system and voting rights. Harris can vote in the event of a 50-50 tie in the Senate. But the bill requires 60 votes to avoid a filibuster.

Elections bill goes to Senate showdown

BY BRIAN SLODYSKO, CHRISTINA A. CASSIDY AND LISA MASCARO
Associated Press

WASHINGTON

The Democrats' expansive elections and voting bill was heading for all but certain rejection late Tuesday in a key Senate test vote, providing a dramatic example of Republicans' use of the filibuster to block legislation.

The far-reaching proposal, at nearly 900 pages, is viewed by backers as the civil rights issue of the era, legislation that is suddenly of the highest priority after the 2020 election as states impose restrictive new laws that could make it more difficult to vote.

In the evenly split Senate, Republicans are united in opposition, seeing the bill as federal overreach and denying Democrats the 60 votes that would be needed to overcome the filibuster and begin debate.

Sen. Raphael Warnock, a Georgia Democrat and senior pastor at the Atlanta church Martin Luther King Jr. once led, called minority Republicans' intention of blocking debate a "dereliction" of duty.

"What could be more hypocritical and cynical than invoking minority rights in the Senate as a pretext for preventing debate about how to preserve minority rights in the society," Warnock, who is Black, said during a floor speech Tuesday.

Republicans showed no sign of yielding.

Republican leader Mitch McConnell called the bill a "partisan power grab" and pledged to help fulfill the Senate's "founding purpose" by stopping it. He also cautioned Democrats against changing the filibuster, calling voting rights "the worst possible place" to "trash the Senate's rules to ram something through."

Months in the making, Tuesday's showdown over the For the People Act, as it is called, is hardly the end of the road. President Joe Biden has vowed what the White House calls the "fight of his presidency" over ensuring Americans' access to voting. At stake are not only election rules that make it easier to vote but also Democrats' ability to confront the limits of bipartisanship and decide whether or not the filibuster rules should change.

The Democratic Party that holds the White House and narrowly controls Congress has been preparing for this moment for months, even as its lawmakers faced their own internal divisions over the sprawling bill. The legislation would remove hurdles to voting erected in the name of election security, curtail the influence of big money in politics and reduce partisan influence over the drawing of congressional districts.

As recently as last week, Sen. Joe Manchin, a moderate West Virginia Democrat, said he couldn't support the bill without changes he wanted as a way to draw Republican support.

His position has since evolved. He proposed his own changes last week, adding provisions for a national voter ID requirement, which is anathema to many Democrats, and dropping a proposed public financing of campaigns.

Hours before Tuesday's vote, he would not say whether he would vote with his party in trying to advance the bill, explaining he was still reviewing the final version.

"Just want to see if it's all in there," Manchin said.

The proposed Manchin changes were welcomed by Biden's administration as a "step forward" and earned a nod of approval from one of the party's key voting rights advocates, former Georgia governor's race candidate Stacey Abrams.

They did little, however, to garner the bipartisan support Manchin was hoping for. Senate Republicans said they would likely reject any legislation that expands the federal government's role in elections.

"I keep thinking there's a few who want to," Jeff Merkley, D-Ore., who authored the legislation in the Senate, said during a conference call Monday night with the group Our Revolution. "But when McConnell lowered the boom," he continued, "we couldn't get a single Republican to join us."

DelBene says child tax credit to reach 1.4M children in state

BY DANIEL WU
Seattle Times

Starting next month, most families with children in Washington state can expect to begin receiving up to $300 in monthly payments as part of the new expanded child tax credit.

Tucked into the federal government's COVID-19 aid package known as the American Rescue Plan, the expanded credit is a key part of what some consider a breakthrough anti-poverty initiative.

But in order for it to be successful, federal officials say they must make sure eligible families who need it most actually get the money.

On Monday – dubbed by the White House as Child Tax Credit Awareness Day – U.S. Rep. Suzan DelBene, D-Medina, promoted the expanded policy at a news conference in Seattle at El Centro de la Raza.

Joined by a handful of parents and community advocates, DelBene, who pushed for the policy before it was included in the federal aid package, touted how many more families could benefit from the expansion.

"The child tax credit is the largest federal investment that we make in our children," she said. "But until the American Rescue Plan, it left behind one third of all kids and families who earn too little to earn the full benefit."

"Many families aren't aware that the benefit is coming," DelBene added later. "So we need to change that."

Nearly 90% of children are in households that are slated to begin receiving money without needing to take further action, according to a White House news release.

That leaves the remaining families – like those who haven't yet filed taxes for 2019 or 2020, and who didn't enroll in the COVID-19 stimulus payment program – needing to still sign up, according to the news release.

That website can be found on IRS.gov under "Credits & Deductions."

"I want to make sure every eligible family in Washington state knows help is on the way and knows how they can get it. It's easy to sign up even if you don't have to file taxes," U.S. Sen. Patty Murray, D-Wash., said in a statement.

In a news briefing with DelBene last week, a member of the White House Council of Economic Advisers said there is concern about making sure the public is aware of the tax benefit.

About 80% of families are expected to get their tax credits through direct deposit, according to White House economic adviser Heather Boushey, meaning others will have to keep an eye on the mail for payment.

The expanded tax credit will be fully refundable. Families can receive the full amount they're eligible for as a check, if their income isn't high enough to receive a large enough tax offset. According to DelBene, this will allow the payments to reach 1.4 million children in Washington, including 642,000 children of color.

From:	^TPA
To:	HANFORD-INFO@LISTSERV.ECOLOGY.WA.GOV
Subject:	Notice of Upcoming Public Comment Period on Proposed Changes to the Hanford Dangerous Waste Permit
Date:	Tuesday, April 27, 2021 2:58:38 PM
Attachments:	image001.png

THE HANFORD SITE

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

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

The U.S. Department of Energy is planning a 60-day public comment period on a proposed Class 2 permit modification to the Hanford Dangerous Waste Permit, Liquid Effluent Retention Facility (LERF) and 200 Area Effluent Treatment Facility (ETF) chapter. This proposed permit modification is required to install a supplemental organic-waste treatment system at ETF.

ETF is located near the center of the Hanford Site and will process liquid waste from the Waste Treatment and Immobilization Plant in support of the Direct-Feed Low-Activity Waste approach to treating tank waste. The new organic-waste treatment system will supplement other treatment systems at ETF to ensure discharges of treated liquids from the facility meet requirements for disposal at the State Approved Land Disposal Site at Hanford.

The comment period is expected to begin in May 2021, with a public meeting in June or July.

The proposed permit modification and supporting documentation will be available online during the public comment period on the Hanford events calendar, the Hanford Administrative Record, and at the Hanford Public Information Repositories.

A summary fact sheet and details of the public meeting will be provided when the comment period begins.

Questions? Please contact Jennifer Colborn, Hanford Mission Integration Solutions, at Jennifer_M_colborn@rl.gov, or Daina McFadden, Washington State Department of Ecology, at Hanford@ecy.wa.gov.

Ecology logo

Visit us on the web and follow our news and social media.

Subscribe or Unsubscribe

From:	^TPA
To:	HANFORD-INFO@LISTSERV.ECOLOGY.WA.GOV
Subject:	Public Comment Period Begins Today on Proposed Changes to the Hanford Dangerous Waste Permit
Date:	Wednesday, June 23, 2021 10:14:48 AM
Attachments:	image002.png Fact Sheet_ETF Supplemental Organic Treatment_FINAL.pdf

THE HANFORDSITE

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

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

The U.S. Department of Energy is holding a 60-day public comment period on a proposed Class 2 permit modification to the Hanford Dangerous Waste Permit, Liquid Effluent Retention Facility (LERF) and 200 Area Effluent Treatment Facility (ETF) chapter. This proposed permit modification is required to install a supplemental organic-waste treatment system at ETF.

ETF is located near the center of the Hanford Site and will process liquid waste from the Waste Treatment and Immobilization Plant in support of the Direct-Feed Low-Activity Waste approach to treating tank waste. The new organic-waste treatment system will supplement other treatment systems at ETF to ensure discharges of treated liquids from the facility meet requirements for disposal at the State Approved Land Disposal Site at Hanford.

The comment period will run from June 23 through Aug. 22. A virtual public meeting will be held July 22, 2021, at 5:30 p.m. PT. To participate, please follow the instructions below:

Visual (presentation only):
Click the GoToWebinar link: https://bit.ly/2RFLQZm;
ID #: 759-306-107

Audio:
1. Dial (509) 372-3087 (local) or (800) 664-0771 (long distance)
2. Enter Conference ID: 1333#

Please submit any comments by Aug. 22, electronically (preferred) or by mail to:

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

Information about the proposed modification and supporting documentation will be available online during the public comment period on the Hanford events calendar, the Hanford Administrative Record, and at the Hanford Public Information Repositories. Please see the attached summary fact sheet.

Questions? Please contact Jennifer Colborn, Hanford Mission Integration Solutions, at Jennifer_M_colborn@rl.gov, or Daina McFadden, Washington State Department of Ecology, at Hanford@ecy.wa.gov.

To request disability accommodation, please contact Jennifer Colborn, jennifer_m_colborn@rl.gov or (509) 376-5840 at least 10 working days prior to the event. DOE makes every effort to honor disability accommodation requests.

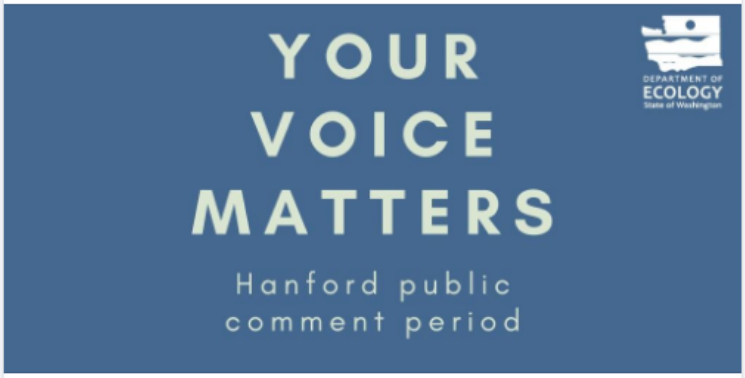
Ecology logo

Visit us on the web and follow our news and social media.

Subscribe or Unsubscribe

Washington Department of Ecology - Hanford
Published by Ecology Ryan · June 23 ·

Today is the LAST day to give us your feedback on a comment period involving future removal of waste at #Hanford. A new U.S. Department of Energy comment period also began today. Check them out here: https://ecology.wa.gov/.../Nuclear.../Public-comment-periods



73	5	–	Boost Post
People Reached	Engagements	Distribution Score	

4

Like Comment Share

Comment as Washington Department of Ec...

Ecology - Hanford @ecyHanford · Jun 23

Today is the LAST day to give us your feedback on a comment period involving future removal of waste at #Hanford. A new @HanfordSite comment period also began today. Check them out here: ecology.wa.gov/Waste-Toxics/N...

You and 6 others

1

Class 2 Permit Modification to the Hanford Dangerous Waste Permit

Class 2 Permit Modification to the Hanford Dangerous Waste Permit

June 23, 2021 – Aug. 22, 2021

The U.S. Department of Energy is holding a 60-day public comment period on a proposed Class 2 permit modification to the Hanford Dangerous Waste Permit, Liquid Effluent Retention Facility (LERF) and 200 Area Effluent Treatment Facility (ETF) chapter. This proposed permit modification is required to install a supplemental organic-waste treatment system at ETF.

Review and comment

For more information on this comment period, including supporting documents, visit Energy's Hanford website and the Hanford Administrative Record.

Comments are due **Aug. 22.** Submit electronically, (preferred), or by mail to:

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

Public meeting

A virtual public meeting will be held 5:30 p.m. PT July 22. To participate via GoToWebinar, please follow the instructions below:

Visual (presentation only)

- Visit this GoToWebinar link;
- ID #: 759-306-107

Audio:

- Dial (509) 372-3087 (local) or (800) 664-0771 (long distance)
- Enter Conference ID: 1333#

Questions? Contact Jennifer Colborn, Hanford Mission Integration Solutions, or Daina McFadden, Ecology.

References

June 29, 2021

Daina McFadden
State of Washington Department of Ecology
3100 Port of Benton Blvd
Richland WA 99354

Comments on Class 2 Permit Modification to Add Steam Stripping (supplemental organic waste treatment) to the 200-Area Effluent Treatment Facility (ETF).

Dear Ms. McFadden:

I am writing in response to the public comment period (June 23, 2021 to August 22, 2021) for the proposed ETF Class 2 Permit Modification[1]. The Class 2 Permit Modification is proposed in order to install a steam stripping treatment unit for supplemental organics, specifically acetonitrile, for which a 2 weight percent solution will be produced. The proposed changes in this package are related to the recent comment period for the ETF delisting petition.

1. Permit condition III.3.J.9 states: "Prior to processing waste through the steam stripper system, the Permittees must provide to Ecology the treatment and disposal pathway for the concentrated acetonitrile distillate secondary waste stream."

   I do not believe a permit should be allowed for construction when there is an unknown disposal path and unknown risks/costs, and with additional constituents present in the waste also unknown. This new waste stream is another example of waste proliferation from WTP (another is the accumulation of loaded cesium ion exchange columns from LAWPS). Can Ecology provide a list of the total volume of waste going into WTP and the total volume of effluents/concentrates/brines/leachates/cesium columns going out?

2. Addendum B.12, Section B.2.2.2 states: "For a waste stream with organic concentrations higher than the delisting treatability envelope, the 200 Area ETF can be configured to operate the steam stripper to remove organics not effectively destroyed in the UV/OX unit."

   The proposed permit omits information that the treatability envelope is incomplete, and will be edited as time goes along (plans are in progress to add constituents). This was made clear in the recent delisting petition update. Again – why grant a permit when the work is not done and the risks are not understood?

[1] Review materials were provided with Letter 21-ECD-001705, "Submittal of Class 2 Permit Modification Notification to the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion for the Liquid Effluent Retention Facility and the 200 Area Effluent Treatment Facility [S-2-8, T-2-8]," June 21, 2021.

3. Addendum B.24 states: "A secondary waste from the primary treatment train is generated from operation of the steam strippers. This waste stream is condensate from the stream stripper overheads. This waste stream will be transferred to an authorized dangerous waste facility for additional treatment." Also Addendum C.13 states: "The distillate from steam stripping, containing essentially all acetonitrile present, will be accumulated prior to treatment at an offsite permitted treatment, storage, and disposal facility."

   I believe Ecology should insist that any selected "dangerous waste facility" be located on the Hanford Site. Tank related liquid waste including the acetonitrile concentrate should not be shipped to Perma-Fix Northwest, for example, due to its poor performance record and proximity to the groundwater and Richland residents. Any dangerous waste facility used should be required to have an up to date EIS and current (non-expired) dangerous waste permit and these are not true of PFNW.

   Further, the composition of the distillate is unknown due to the absence of an integrated WTP/EMF pilot plant. What is the expected overall composition? How much tritium and other isotopes will be present? DOE should not be pushing WTP design and operability risks on the public by relying on PFNW. The combined radioactive and chemical risks should always be presented together, so that conditions are clearly stated.

4. Addendum C.56 states: "Additional organics compounds will be emitted when the stream stripper is in operation. The emissions are described in NOC-ENV-5503. The emissions fractions were determined using process simulation software."

   How was the process simulation software validated, when there is no integrated pilot plant data for comparison?

5. Addendum C.74 Primary Treatment train diagram.

   The diagram in this figure identifies "vitrification tanks." Shouldn't these be labeled "verification" tanks?

6. Effluent Treatment Facility Acetonitrile Steam Stripping System Modification Traveler MT-50529 states: "Contaminant levels for Tritium and/or other expected radionuclides shall be confirmed and/or determined *during the design process*."

   Is the design process not complete? The radionuclide content is important and relevant, given that DOE is trading acetonitrile risk for tritium risk, per the radioactive air emissions notice of construction. Sometimes the rad content and the chemical content cannot be easily separated into Ecology scope and Department of Health scope, and sometimes the risks have synergy. Please provide the entire "expected" composition for chemicals and radionuclides, since the design should be complete before construction begins.

7. Page 3-20 states: "The purpose of the first stage 60K-CO-001 Steam Stripper is to strip acetonitrile, acrylonitrile and other minor constituents from a waste water stream (influent) generated by upstream facility operations. The waste stream from 60K-CO-001 is condensed and pumped to the second stage 60K-CO-201 Concentrator to strip acetonitrile, acrylonitrile and other minor constituents from the waste stream.

   Contrary to the page 3-20 statement about other constituents present, the maximum concentrations in Table 3-2 show that all other constituents are zero. If the maximum evaluated is zero, shouldn't the acceptance criteria also be zero in the LERF basins? Acetone exists in tank waste. N-NitrosoD is not defined. Separations are generally not 100% perfect, as is implied here. Can you clarify the data?

Table 3-2. Maximum Bounding Process Stream Constituents.

Constituent	Stream 302 Distillate to Distillate Storage Tank wt%
Water	98
Acetonitrile	2
Acrylonitrile	0
Acetone	0
N-NITROSOD	0
Air	0

Reference: H-2-839048

8. The steam stripper is designed to cycle 10 times per year, but I could not find a total of the acetonitrile produced by WTP. What is the total mass of acetonitrile expected to be accumulated from WTP per year at ETF? According to the delisting petition this information should be available based on the amount projected to be created by incomplete combustion in the WTP LAW melters.

9. It appears that the current proposal is solely to address an acetonitrile steam stripper, but there are other unknowns and chemicals of concern to be addressed "later." There is no guarantee that there will be a future capability to treat future unknowns, leaving a considerable risk of what to do with non-compliant effluents from the WTP.

Thank you for considering these comments.