



Response to Comments Proposed Class 3 Permit Modification for the Integrated Disposal Facility Leachate Collection System

May 24 – July 23, 2021

For the **Nuclear Waste Program**

Washington State Department of Ecology
Richland, Washington

December 2022, Publication 22-05-024



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¹ <https://apps.ecology.wa.gov/publications/summarypages/2205024.html>

² www.ecology.wa.gov/Hanford

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region 360-407-6300	Northwest Region 206-594-0000	Central Region 509-575-2490	Eastern Region 509-329-3400
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Region	Counties Served	Mailing Address	Phone
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Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
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

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DEPARTMENT OF
ECOLOGY
State of 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.)

This Response to Comments document addresses comments received during a public comment period held May 24 through July 23, 2021. The comment period was held for a proposed Class 3 permit modification for the Integrated Disposal Facility, C3-IDF-2021-01, submitted by the permittees.

The Response to Comments purpose is to:

- 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	Proposed Class 3 Permit Modification for the Integrated Disposal Facility Leachate Collection System, May 24 – July 23, 2021
Permit	<i>Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste</i> , Integrated Disposal Facility
Permittees	U.S. Department of Energy, Richland Operations Office and Central Plateau Cleanup Company LLC
Original Issuance date	Sept. 28, 1994

To see more information related to the Hanford Site and nuclear waste in Washington, please visit our webpage, [Hanford Cleanup](#)³.

³ <https://www.ecology.wa.gov/Hanford>

Reasons for Issuing the Permit

The Integrated Disposal Facility (IDF) is located on 202 acres of land within the south-central portion of the 200 East Area of the Hanford Site. IDF plays a vital role in supporting Hanford's Direct-Feed Low-Activity Waste (DFLAW) program, which will treat Hanford's low-activity tank waste. The purpose of IDF is to provide a disposal facility for the permanent, environmentally safe disposition of immobilized low-activity waste (ILAW) glass from the Waste Treatment and Immobilization Plant (WTP) and other operational waste streams that meet Resource Conservation and Recovery Act (RCRA) requirements for land disposal.

The permittees requested a Class 3 permit modification for the Integrated Disposal Facility, C3-IDF-2021-01, to Ecology. This proposed permit modification will allow the permittees to operate two Leachate Collection Units (LCS) Dangerous Waste Management Units (DWMUs), located north of the IDF Disposal Cells, as miscellaneous units to store liquid leachate in accordance with state law (WAC 173-303-680). The miscellaneous units, also called LCUs, are approximately 30.9 m (101.5 ft) in diameter and 2.5 m (8.2 ft) high and are constructed of corrugated steel. The bottom of the side wall for each unit is bolted to a 0.45 m (1.5 ft) thick, 1.4 m (4.5 ft) deep concrete ringwall. A dual containment liner system is connected to the top, inside wall of each unit. Each unit includes ancillary equipment for the transfer of leachate from the disposal cells. Ancillary equipment is comprised of the Crest Pad Building, Leachate Transfer Building, combined sump, and transfer piping.

The proposed permit modification provides detailed information which supports operation of two LCS DWMUs. The modification will incorporate new and modified information to the following IDF Permit files:

- Unit-Specific Permit Conditions.
- Chapter 1.0, "Part A Form."
- Chapter 3.0, "Waste Analysis Plan."
- Chapter 4.0, "Process Information."
- Chapter 6.0, "Procedures to Prevent Hazards."
- Chapter 8.0, "Personnel Training."
- Chapter 11.0, "Closure."
- Appendix 4A1, "Phase 1 Critical Systems Design Report."
- Appendix 4A3, "Critical Systems Design Drawings."
- Appendix 4C, "Facility Response Action Plan."
- Appendix 4D, "Construction Specifications (C-1) RPP-18489, Rev. 1."
- Appendix C7, "Leachate Monitoring Plan." (new)
- Appendix C7A, "Sampling and Analysis Plan for IDF Leachate." (new)
- Appendix C8, "Sub-Surface Liquids Monitoring and Operations Plan." (new)
- Appendix 11A, "Visual Sampling Plan Report Documentation." (new)

Public Involvement Actions

The U.S. Department of Energy (Energy) encouraged public comment on the proposed Class 3 permit modification for the Integrated Disposal Facility during a 60-day, public comment period held May 24 through July 23, 2021.

Energy and Ecology took the following actions to notify the public:

- Mailed a public notice announcing the comment period to 1,241 members of the public.
- Placed a public announcement legal classified advertisement in the Tri-City Herald on May 23, 2021.
- Emailed a notice announcing the start of the comment period to the Hanford-Info email list, which has 1,223 recipients.
- Ecology posted a comment period notice on the Washington Department of Ecology – Hanford’s Facebook and Twitter pages.

Energy held a virtual public meeting 5:30 p.m. June 24, 2021, on GoToWebinar. Seven members of the public attended, and no comments were collected.

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

- Transmittal letter
- Fact Sheet for the Proposed Integrated Disposal Facility Permit Modification
- Class 3 Permit Modification to the Integrated Disposal Facility (C3-IDF-2021-01)

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 IDF Permit modification. The comments and responses are in [Attachment 1](#).

Commenter	Organization
Anonymous Citizen	Citizen
Hanford Challenge	Organization
Columbia Riverkeeper	Organization
Confederated Tribes of the Umatilla Indian Reservation	Tribal

Attachment 1: Comments and Responses

Description of comments:

Ecology accepted comments from May 24 through July 23, 2021. This section provides a summary of comments that we received during the public comment period and our responses, as required by Revised Code of Washington (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

Of note in the materials submitted is discussion of an additional "secondary" leak detection system (SLDS), which is beneath the RCRA-required secondary containment liner. The SLDS drains to a "tertiary" geomembrane liner. The submittal notes that "the SLDS is not a design requirement of Washington Administrative Code (WAC) 173-303-665, however U.S. Department of Energy (DOE) is adding the design feature pursuant to its authority under the Atomic Energy Act of 1954 (AEA) and not for the purposes of compliance with the dangerous waste regulations." [See page Chapter 4.7]

It appears the drainage, if any, from the "voluntary" extra leachate liner is to be processed in the same manner as the RCRA-required leachate treatment and disposal.

If DOE has implemented a liner system above and beyond the call of RCRA, it is important to know why, since this implies additional hazards that a RCRA liner cannot mitigate.

I found a related discussion in RPP-PLAN-26534, Rev 0, "Integrated Disposal Facility Operational Monitoring Plan to Meet DOE Order 435.1," August 8, 2005. This report established that monitoring of the IDF SLDS and the Leak Detection Chamber was being developed in operations procedures and with Ecology in the Part B permitting process. As a result, Ecology should have an interest in it.

I looked at DOE Implementing Manual DOE M 435.1 for a basis, and could find no guidance that would lead to a requirement for a tertiary liner or secondary leachate system above and beyond the primary leachate system as a justified public expense. However, a recent presentation¹ on the IDF Performance Assessment indicates that DOE Order 435.1 and DOE Manual 435.1 are associated with the need to meet performance objectives for:

- All-pathway total effective dose < 25 mrem/yr to a representative member of the public, excluding the dose from radon
- Air-pathway total effective dose < 10 mrem/yr to a representative member of the public, excluding the dose from radon
- Radon dose release rate from the facility < 20 pCi/m²/sec or concentration < 0.5 pCi/L at the receptor location
- Water resources impacts < applicable state or federal drinking water standards
- Acute exposure dose < 500 mrem/yr and chronic exposure dose < 100 mrem/yr as the result of an inadvertent intrusion into the waste

So - the secondary leachate system at IDF is tied to DOE O 435.1, and DOE O 435.1 is tied to drinking water standards in addition to radioactivity. Implementation to meet drinking water standards, which apply to isotopes as well as chemicals, should be of interest to Ecology despite this being a "voluntary" action.

1

https://www.energy.gov/sites/default/files/2017/11/f46/Bob%20Andrews%20DF%20PA%20Modeling%20Approach_PRA_CoP_Oct2017_Rev2.pdf

As shown above, it appears the secondary leachate collection system is intended to provide some benefit above and beyond RCRA, and is intended to meet a higher level of confinement than ordinary mixed waste landfills.

- My point here is that the concern for the hazards associated with the leachate should not be dropped at the Hanford Site boundary.

Response to I-1-1

Thank you for your comment.

During the development of the IDF permit, Ecology and the Permittees held discussions on monitoring of the vadose zone. Ecology requested vadose zone monitoring to be installed, due to the depth to groundwater and the slow transport time from the bottom of the landfill to the aquifer. In response to Ecology's request for vadose zone monitoring, the USDOE proposed the additional system to collect leachate as an operational substitute. The Sub-surface Liquids Monitoring and Operations Plan (SLMOP) permit conditions were developed and were agreed to by both Ecology and the Permittees.

The purpose of this permit modification is to add the two miscellaneous dangerous waste management units (DWMUs) for storage of leachate into the IDF permit. Through this permit modification, Appendix C8, Sub-surface Liquids Monitoring and Operations Plan is being incorporated into the IDF permit.

Additionally, the following sentence is proposed to be added in Section 3.3.1 in Chapter 3 through this modification; "Sampling and analysis is performed to ensure the leachate meets the acceptance criteria of the receiving facility and to meet RCRA monitoring requirements". Similarly, the following sentence is proposed to be added in Section C7A.2 in Appendix C7A; "Additionally, leachate will be collected from the leachate collection units semi-annually (i.e., every six-months) to analyze for parameters that demonstrate compliance with LERF/ETF waste acceptance criteria."

Furthermore, the existing unit specific condition (III.11.F.1.b) is revised to ensure semi-annual sampling of leachate from the LCU to meet waste acceptance criteria at the receiving Treatment Storage and Disposal facility (III.11.F.1.a).

However, discussions about hazards associated with the leachate outside the IDF permit (e.g., the operation of the receiving facility) is outside the scope for this permit modification.

Comment I-1-2

Page Chapter 3.9 states that "IDF leachate will be stored in the Leachate Collection System managed in accordance with WAC 173-303-200 and until transferred to the Liquid Effluent Retention Facility/Effluent Treatment Facility (LERF/ETF) (or other permitted TS) for treatment." Note that "other permitted TSDs" could include the Richland Perma-Fix Northwest Facility (PFNW), which is far closer to the water table and far closer to the public than are the Hanford 200 Areas.

The recent non-performance of an integrated flow sheet calculation, that was accepted in TPA Milestone M-062-50 based on promises of future work, is an indication that the site will be

"making up" solutions as problems appear, rather than understanding and managing integrated risks. This means there could be a "surprise" need to send IDF leachate to somewhere other than ETF or West Area Pump and Treat, such as PFNW.

- I would appreciate if Ecology will improve the rigor of requirements on Page Chapter 3.9 for storage or treatment of IDF effluent at any off-site "permitted TSD" to include an updated, non-expired permit, which addresses, in concert with DOH, the special hazards associated with IDF leachate. The rigor should also include an understanding of the leachate uncertainties and hazards, the history of performance and safety troubles at PFNW, and the distance to groundwater. Troubles at PFNW have been described in detail².
- Actually, leached Tc-99 or other isotopes and chemicals from Hanford's IDF should be treated on-site, and not off-site in the vicinity of Richland residents and groundwater.
- Lastly, page Chapter 3.11 states that IDF-generated wastes are exempt from waste confirmation and receipt activities as the waste is "generated by known processes within the perimeter of IDF." "IDF-generated wastes are considered accepted at IDF upon generation." Are you sure? Ecology should specify that sampling is required for IDF treated effluent. This is especially so since there is no flow sheet (per TPA milestone M-62-50 that was not actually met) to help verify the ranges of wastes that IDF can receive. Besides ILAW glass and crushed HEPA filters, there could be surprises from the WTP laboratory, or novel wastes arising from other parts of the plant, such as the EMF.

Response to I-I-2

Thank you for your comment. To address the uncertainty about what waste is expected for disposal in IDF and what contaminants will be collected through the leachate collection system; Ecology added Permit Conditions to require Secondary Waste Form Technical Requirements Document (SWTRD) (Draft Condition III.11.E.5) in addition to the existing conditions for ILAW Waste Form Technical Requirements Document (IWTRD) (Draft Condition III.11.E.4) through a separate class 3 permit modification to move IDF into Active Life.

The purpose of this permit modification is to add the two miscellaneous DWMUs for storage of leachate into the IDF permit. The following sentence is proposed to be added in Section 3.3.1 in Chapter 3 through this modification; "Sampling and analysis is performed to ensure the leachate meets the acceptance criteria of the receiving facility and to meet RCRA monitoring requirements". Similarly, the following sentence is proposed to be added in Section C7A.2 in Appendix C7A; "Additionally, leachate will be collected from the leachate collection units semi-annually (i.e., every six-months) to analyze for parameters that demonstrate compliance with LERF/ETF waste acceptance criteria."

Furthermore, the existing unit specific condition (III.11.F.1.b) is revised to ensure semi-annual sampling of leachate from the LCU to meet waste acceptance criteria at the receiving Treatment Storage and Disposal facility (III.11.F.1.a).

²<https://static1.squarespace.com/static/568adf4125981deb769d96b2/t/Sfbde47518e72e5fdb9a8298/1606280319740/FINAL+PermaFix+Report.pdf> "Risky Business at Perma-Fix Northwest."

Comment specific to PFNW's operation should be addressed through the PFNW's permit; therefore, it is outside the scope for this permit modification.

O-1: HANFORD CHALLENGE

Comment O-1-1

At the time of this writing there are holistic negotiations underway between the State of Washington and the U.S. Department of Energy that concern the management, treatment and disposal of Hanford's tank waste. These negotiations are closed to encourage open and transparent conversation between the parties. While we appreciate the need for open conversation, we believe effective and meaningful engagement with the public and open and transparent government to government negotiation with the tribes is an essential part of driving the collective towards a safe and effective cleanup. We are concerned that the holistic negotiation transparency may be at the expense of open and transparent communication with the broader Hanford community. We would like to see a process that engages the broader Hanford community before any formal agreement is reached during the holistic negotiations. The future use of IDF is both known and unknown. A concern previously noted by Hanford Challenge and others is an integrated mass balance flow as a single secondary document. Our concern for IDF is the uncertainty about what contaminants will end up in this landfill that could end up in the leachate collection system and making sure the leachate collection system is safely and effectively able to manage that waste stream.

Response to O-1-1

Thank you for your comment.

Ecology has acknowledged (e.g., in forums like the Oregon Hanford Cleanup Board and the Hanford Advisory Board) the need for a robust public involvement process following completion of a tentative agreement and draft milestone changes. Ecology compared the current negotiations to the 2010 Tank Waste Settlement. The latter included regional public meetings. We anticipate that public involvement for the current negotiations may differ from the 2010 activities considering the current COVID-19 related restrictions on travel and public meetings. Also, technology has advanced since 2010 to the point that virtual public meetings are a relatively routine and accepted tool.

Comment O-1-2

Include a Periodic Review of Assumptions that Cover Bounding Conditions: As more clarity emerges about waste that will be disposed of in IDF, Hanford Challenge would like Ecology to require a periodic review of assumptions to manage the uncertainty about what waste is expected for disposal in IDF and what contaminants will be collected through the leachate collection system. It is important to ensure the leachate collection system and tanker trucks that will transport the leachate will be adequately and safely equipped to handle the IDF contaminated leachate.

Response to O-1-2

Thank you for your comment.

To address the uncertainty about what waste is expected for disposal in IDF and what contaminants will be collected through the leachate collection system; Ecology added Permit Conditions to require SWTRD (Draft Condition III.11.E.5) in addition to the existing conditions for IWTRD (Draft Condition III.11.E.4) through the separate class 3 permit modification to move the IDF into Active Life (8C.2022.2D). In additions to the SWTRD and IWTRD, the Permittees are required to submit a permit modification request for any additional new waste forms or secondary waste forms to be disposed of at IDF (Current Condition III.11.I). Furthermore, leachate from LCRS (primary sump), LDS (secondary sump), and the LCUs will be sampled in accordance with Permit Conditions (III.11.F.1.a and III.11.F.2.c).

Comment O-1-3

Consider Building a Spill Pallet for Truck Route to LERF: We recognize that this comment period only deals with the cell 1 and 2 to the leachate collection tank and the tank to the truck and does not include the transportation route that will be used to take the contaminated leachate to the Liquid Effluent Retention Facility for storage prior to treatment at the Effluent Treatment Facility. However, we would like to urge the Department of Ecology to consider requiring a spill pallet to be built on the route that will be used to transport the leachate in tanker trucks for environmental protection in the event of tanker truck spills and leaks.

Response to O-1-3

Thank you for your comment.

The purpose of this permit modification is to add the two miscellaneous DWMUs for storage of leachate into the IDF permit. Therefore, this comment is out of the scope for this modification. Ecology believes that transportation emergency matters should be addressed through Hanford Site Emergency Management Plan (HEMP). For transportation incidents that occur on the site, the Incident Command System is used to mitigate the situation. Upon notification of the event by the Patrol Operations Center (POC), the Hanford Fire Department will assume incident command responsibilities. The Hanford EOC Shift Office will have the responsibility for event classification and activation of the Hanford ERO as appropriate (1.3.2.3 in the HEMP).

O-2: COLUMBIA RIVERKEEPER

Comment O-2-1

A. Ecology and Energy's Proposed Permit Modification must require sampling of all waste and prohibit the disposal of incompatible types of waste at IDF.

Response to O-2-1

Thank you for your comment.

The purpose of this permit modification is to add the two miscellaneous DWMUs for storage of leachate into the IDF permit. Therefore, this comment on the referenced section is out of the scope for this permit modification.

Comment O-2-2

B. Ecology and Energy's Proposed Permit Modification cannot allow leachate to be transferred between leachate collection tanks via the leachate transfer pump.

Response to O-2-2

Thank you for your comment.

The purpose of this permit modification is to add the two miscellaneous DWMUs for storage of leachate into the IDF permit. Apart from this proposed modification, there is a separate permit modification to move the IDF into Active Life, for which Ecology scheduled to hold a re-opened public comment period from 7/25 to 9/9/2022. If that modification becomes effective, both IDF cells will be allowed to accept mixed waste for disposal.

Comment O-2-3

C. Ecology and Energy's Proposed Permit Modification must adopt PUREX tanks TK-P4 and TK-40 conditions of clean closure.

Response to O-2-3

Thank you for your comment.

Section 11.3 in the current permit states, "At the time of closure, this closure plan will be updated to reflect the current closure plan schedule per WAC 173-303-830, Appendix I. In addition, when a closure date is established, a revised closure plan and closure schedule will be submitted to Ecology that contains detailed information regarding specific activities and implementation timeframes."

The Permittees are required to submit to Ecology a permit modification to update the closure plan prior to closure activities, per WAC 173-303-830. Ecology agrees that clean closure of LCS should be verified through soil sampling during closure activities, as described in Chapter 11 that went out for public review. In the appropriate future permit modification, Ecology will ensure that the updated closure plan will cover detailed and adequate plan for closure activities for the LCS.

Comment O-2-4

D. Ecology and Energy must explain why leachate collection tanks allow air venting.

Response to O-2-4

Thank you for your comment.

Leachate tank dome covers replaced floating covers due to maintenance difficulty associated with clearing debris and long-term weathering of the floating covers.

The air emission standards in 40 CFR 264, Subpart BB, apply to equipment that contains or contacts hazardous waste with a total organic concentration of 10 percent by weight or more. Leachate management equipment does come in contact with hazardous waste. However, waste disposed in the IDF will be LDR compliant and consist of vitrified, solidified, and encapsulated waste. Waste treated in this manner would not result in the generation of leachate that would meet or exceed the total organic concentration limitation of 10 percent by weight.

WAC 173-303-640(3)(a) requires that an independent qualified registered professional engineer (IQRPE) certify that the proposed tank system has been designed with appropriate pressure control systems. The venting to allow equilibration with the outside air is necessary to prevent pressure buildup within the LCUs. There are no existing thresholds that would trigger a change in operations.

Comment O-2-5

E. Ecology and Energy's Proposed Permit Modification cannot allow IDF leachate to be treated at Perma-Fix Northwest.

Response to O-2-5

Thank you for your comment.

The purpose of this permit modification is to add the two miscellaneous DWMUs for storage of leachate into the IDF permit. The following sentence is proposed to be added in Section 3.3.1 through this modification; "Sampling and analysis is performed to ensure the leachate meets the acceptance criteria of the receiving facility and to meet RCRA monitoring requirements". Furthermore, Ecology proposes to revise the existing Permit Condition (III.11.F.1.b), to additionally require leachate in the LCRS (primary sump) to be sampled and analyzed monthly for the first year of operation of the facility and quarterly thereafter (pursuant to WAC 173-303-200). Additionally, leachate from the LCUs will be sampled and analyzed semi-annually to meet waste acceptance criteria at the receiving Treatment Storage and Disposal Facility (III.11.F.1.a).

Comment specific to PFNW's operation should be addressed through the PFNW's permit; therefore, it is outside the scope for this permit modification.

Comment O-2-6

F. Ecology and Energy's Proposed Permit Modification must incorporate climate modeling.

Response to O-2-6

Climate modeling is outside the scope of the Resource Conservation and Recovery Act (RCRA).

Section C.4.2.6.1, Process Information, details operation of the leachate collection and removal system (LCRS). The LCRS is designed to accommodate a 25-year, 24-hour storm event, as required by 40 CFR 264 regulations and EPA guidance. Should a storm occur that exceeds the 25-year, 24-hour storm event, the LCRS sump is designed to temporarily store leachate at a greater depth than 30.5 cm (1 ft).

During the review of this proposed permit modification, Ecology also examined Publication no. 17-09-052, "A Guide for Cleanup Project Managers to Increase the Resilience of Toxic Cleanup Sites to the Impacts from Climate Change". The Guidance did not identify any issues, and did not suggest that any changes were necessary.

Comment O-2-7

G. Ecology and Energy should work with soil and Native plant experts when designing the landfill cover.

Response to O-2-7

Thank you for your comment.

The purpose of this permit modification is to add the two miscellaneous DWMUs for storage of leachate into the IDF permit. Therefore, discussion about designing the landfill cover is outside the scope for this permit modification.

Section 11.3 in the current permit states, "At the time of closure, this closure plan will be updated to reflect the current closure plan schedule per WAC 173-303-830, Appendix I. In addition, when a closure date is established, a revised closure plan and closure schedule will be submitted to Ecology that contains detailed information regarding specific activities and implementation timeframes."

Ecology agrees that the proposed closure plan does not contain detailed information, however it is because currently IDF has not started the active-life operation. The Permittees are required to submit to Ecology a permit modification to update the closure plan prior to closure activities start per WAC 173-303-830.

T-1: CTUIR

Comment T-1-1

Chapter 11: 11.1.5.1.7 Vegetative Cover: Paragraph two reads: "A mixture of seeds would be used to establish vegetation. The seed types would be selected based on resistance to drought, rooting density, and ability to extract water."

Comment: The seeds used should be specified as species that are native to the region and preferably growing in similar areas at the Hanford Site.

Requested Action: Change this paragraph to read: “A mixture of seeds will be used to establish vegetation by seeding the surface and propagating seedlings for installation on the surface. The species selected will: 1) be native to the region and preferably growing in similar areas at the Hanford Site, and 2) will be developed in coordination with the stakeholder Tribes.”

Response to T-1-1

Thank you for your comment.

The purpose of this permit modification is to add the two miscellaneous DWMUs for storage of leachate into the IDF permit. For this Class 3 modification, only the deleted text (as shown in red-line strike out) and new text (red-line) in Chapter 11 are open for public comment. Therefore, this comment on the referenced section is out of the scope for this permit modification.

Ecology responded by email to CTUIR on 2/24/2022, encouraging to consider resubmitting their comments during the reopened 45-day public comment period for IDF Active Life modification (8C.2022.2D), which is the appropriate permit modification for this comment.

Comment T-1-2

Chapter 11: 11.1.5.4 Deep-Rooted Plants: First paragraph bullet point one reads: “The surface soil (top two layers) would retain most of the precipitation, because the underlying drainage layer would have significantly higher permeability and much less water retention capacity. Therefore, it is expected that vegetation preferentially would occupy the surface soil layer and not have an affinity for growing into the drier underlying layers.

Comment: One cannot assume that roots will not penetrate the drier drainage layers. Roots have been observed below the wetting front at the Hanford Site and in gravels below finer soils.

Requested Change: ‘...retention capacity. Therefore, vegetation that preferentially occupies the surface soil layer and does not have an affinity for growing into the drier underlying layers is required.

Response to T-1-2

Thank you for your comment.

The purpose of this permit modification is to add the two miscellaneous DWMUs for storage of leachate into the IDF permit. For this Class 3 modification, only the deleted text (as shown in red-line strike out) and new text (red-line) in Chapter 11 are open for public comment. Therefore, this comment on the referenced section is out of the scope for this permit modification.

Ecology responded by email to CTUIR on 2/24/2022, encouraging to consider resubmitting their comments during the reopened 45-day public comment period for IDF Active Life modification (8C.2022.2D), which is the appropriate permit modification for this comment.

Comment T-1-3

Comment: This plan is very generalized and needs much more detail before a useful review can be provided.

Requested Action: Prepare a detailed plan for the vegetation aspects of the cover as in Link et al (1994) for the Hanford Prototype Barrier. This can be done efficiently by contracting the effort to local botanical experts with experience at the Hanford Site.

Link, S. O., W. J. Waugh, and J. L. Downs. 1994. The role of plants on isolation barriers systems. In: InSitu Remediation: Scientific Basis for Current and Future Technologies, eds. G. W. Gee and N. R. Wing, pp. 561-592. Proceedings of the 33rd Hanford Symposium on Health and Environment, Pacific Northwest Laboratory, Richland, Washington. Battelle Press, Columbus, Ohio.

Response to T-1-3

Thank you for your comment.

The purpose of this permit modification is to add the two miscellaneous DWMUs for storage of leachate into the IDF permit. For this Class 3 modification, only the deleted text (as shown in red-line strike out) and new text (red-line) in Chapter 11 are open for public comment. Therefore, this comment on the referenced section is out of the scope for this permit modification.

Ecology agrees that the current closure plan does not contain detailed information, however it is because currently IDF has not started the active-life operation. The Permittees are required to submit to Ecology a permit modification to update the closure plan prior to closure activities start per WAC 173-303-830.

Comment T-1-4

Comment: Figure 11.1 depicts the use of a compacted soil/bentonite admix having a low drainage rate that should direct precipitation that drains through the surface soil/vegetation cover to the drainage ditch. Using sand for the surface cover will maximize the likelihood that precipitation will drain to the admix layer. A silt will minimize the likelihood that precipitation will drain to the admix layer. The suggestion is to import silt for this purpose. If sand is used with only bunchgrasses then there are a few that can be suggested that are native to the region and likely to reproduce. It appears that crested wheatgrass (*Agropyron cristatum*) is not reproducing where it has been planted in the 200 Areas. (Refer to addendum table on the last page for grass species recommendations.)

The initial earthen cover plans are very general, with much work needed to specify specific soil types along with a detailed plan for the engineered capillary break. There is also great opportunity with the landfill cover beyond functionality, to potentially provide something aesthetically pleasing which supports native wildlife.

Requested Action: Contract with soil physicists, native plant experts, and engineers to design a landfill cover and closure plan that is scientifically sound and beneficial to native wildlife communities.

Response to T-1-4

Thank you for your comment.

The purpose of this permit modification is to add the two miscellaneous DWMUs for storage of leachate into the IDF permit. For this Class 3 modification, only the deleted text/figure (as shown in red-line strike out) and new text/figure (red-line) in Chapter 11 are open for public comment. Therefore, this comment on the referenced section is out of the scope for this permit modification.

Ecology responded by email to CTUIR on 2/24/2022, encouraging to consider resubmitting their comments during the reopened 45-day public comment period for IDF Active Life modification (8C.2022.2D), which is the appropriate permit modification for this comment.

Comment T-1-5

Please note that this appendix or table can be placed in section 11.1.5.1.7 Vegetative Cover of WA7890008967 as noted in AR-13286.

Appendix or Table

Plant species found in sand and/or silt (++++ prominent, + uncommon, - absent) that are acceptable to the Confederated Tribes of the Umatilla Indian Reservation for restoring the Integrated Disposal Facility landfill cover surface.

Scientific name	Common name	Sand	Silt
<i>Achnatherum hymenoides</i>	Indian ricegrass	+++	+
<i>Elymus elymoides</i>	Bottlebrush squirreltail grass	++	+
<i>Elymus lanceolatus ssp. lanceolatus</i>	Thickspike wheatgrass	+++	-
<i>Elymus wawawaiensis</i> *	Snake river wheatgrass	+	+
<i>Hesperostipa comata</i>	Needle and thread grass	+++	+
<i>Poa secunda</i>	Sandberg's bluegrass	++++	++++
<i>Pseudoroegneria spicata</i>	Bluebunch wheatgrass	+	+++
<i>Sporobolus cryptandrus</i>	Sand dropseed	++	-

*Found in Franklin County

Response to T-1-5

Thank you for your comment.

The purpose of this permit modification is to add the two miscellaneous DWMUs for storage of leachate into the IDF permit. For this Class 3 modification, only the deleted text (as shown in red-line strike out) and new text (red-line) in Chapter 11 are open for public comment. Therefore, this comment on the referenced section is out of the scope for this permit modification.

Ecology responded by email to CTUIR on 2/24/2022, encouraging to consider resubmitting their comments during the reopened 45-day public comment period for IDF Active Life modification (8C.2022.2D), which is the appropriate permit modification for this comment.

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

PUBLIC COMMENT PERIOD

Proposed Class 3 Permit Modification for the Integrated Disposal Facility Leachate Collection System

Fact Sheet

**GET
INVOLVED**

Comment Period

May 24 – July 23, 2021

Administrative Record

<https://go.usa.gov/x6qs2>

Virtual Public Meeting

June 24, 2021

5:30 p.m. PT

Meeting Registration:

<https://bit.ly/3dwPvB8>

Webinar ID: 989-630-931

Send comments by July 23 to:

<https://bit.ly/2Swg7KJ>



Questions?

Jennifer Colborn

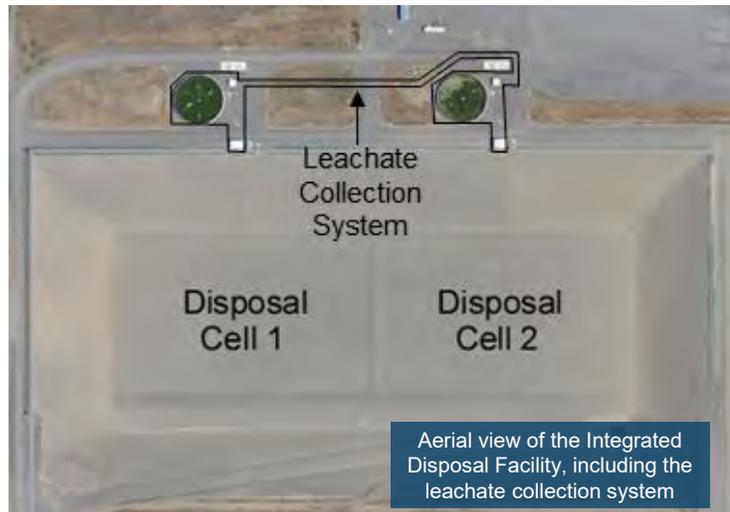
(509) 376-5840

Jennifer_M_Colborn@rl.gov

Daina McFadden

(509) 372-7950

Hanford@ecy.wa.gov



Aerial view of the Integrated Disposal Facility, including the leachate collection system

The U.S. Department of Energy (DOE) is holding a 60-day public comment period on a proposed Class 3 modification to the Hanford Dangerous Waste Permit. This proposed modification would support operation of Hanford's Integrated Disposal Facility's leachate collection system to allow for disposal of mixed low-level waste in the engineered landfill.

Background

The 580-square-mile Hanford Site in southeastern Washington state 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, including protection of the Columbia River, are Hanford's primary missions.

About the Integrated Disposal Facility

The Integrated Disposal Facility (IDF) is a key component of the Hanford Site's Direct-Feed Low-Activity Waste program to treat tank waste, a top priority in Hanford's cleanup mission. Designed similar to Hanford's existing Environmental Restoration Disposal Facility, the IDF will provide permanent, environmentally safe containerized disposition for mixed low-level waste from Hanford operations, including low-activity tank waste that will be vitrified (immobilized in glass) in Hanford's nearby Waste Treatment and Immobilization Plant.

The IDF's two disposal cells include an engineered liner to collect leachate (water from rain, snowmelt and dust suppression) to protect the groundwater. Leachate collected from each disposal cell is automatically pumped to the IDF leachate collection system. The leachate system consists of two collection units, ancillary equipment, and connected pipelines that allow leachate to be transferred between the units. Each collection unit is approximately 100 feet in diameter and 8 feet high, with a working capacity of 375,000 gallons.

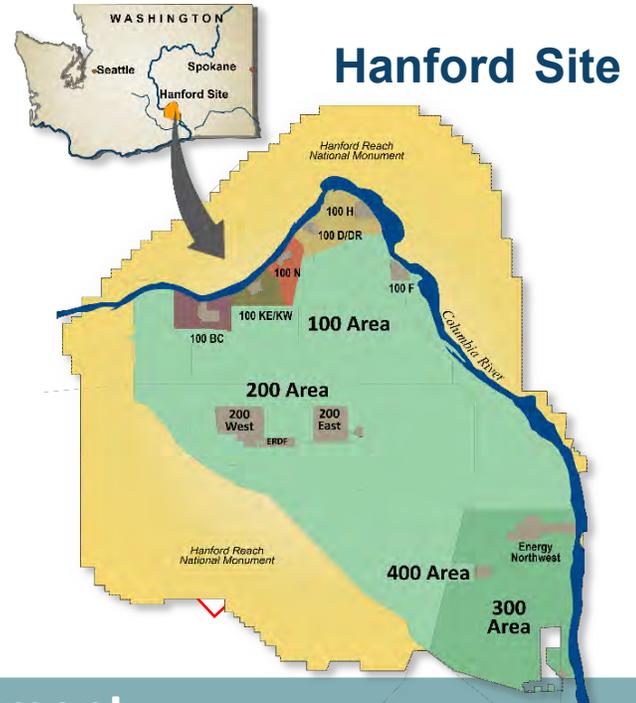


Public Comment Period: Proposed Class 3 Permit Modification for the Integrated Disposal Facility Leachate Collection System

Permit Modification Overview

The DOE and contractor Central Plateau Cleanup Company are requesting a Class 3 modification to the IDF chapter of the permit to add the facility's leachate collection system as a "Miscellaneous Unit" under state regulation WAC 173-303-680. Proposed modifications include added language to permit chapters and updates to Part A of the permit.

The permit establishes requirements to ensure that waste management activities protect human health and the environment. Class 3 modifications are the highest level of permit changes under state regulations (WAC 173-303-830) and require a 60-day public review process and a public meeting.



Public Involvement

A 60-day public comment period will run from May 24 through July 23, 2021. A virtual public meeting will be held June 24 at 5:30 p.m. PT.

All comments must be submitted by July 23, 2021, in writing, by mail or electronically (preferred) to:

Washington State Department of Ecology (Ecology)
3100 Port of Benton Boulevard
Richland, WA 99354
<https://bit.ly/2Swg7KJ> (preferred)

To register for the virtual public meeting:

Visual (presentation only): Click the GoToWebinar link: <https://bit.ly/3dwPvB8>; ID #: 989-630-931

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

Copies of the proposed permit modification 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/x6qs2>, and in the Hanford Public Information Repositories at <https://go.usa.gov/xVDTS>. Upon completion of the public comment period, Ecology will address public comments and prepare a Response to Comment document.

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

Questions? Please contact Jennifer Colborn, Hanford Mission Integration Solutions, at (509) 376-5840 or Daina McFadden, Ecology, at (509) 372-7950. To request disability accommodation, please contact Jennifer Colborn at (509) 376-5840. DOE makes every effort to honor disability accommodation requests.



Public Involvement Opportunity

Comment Period:

May 24 – July 23, 2021



In echo of Arizona, Georgia judge orders ballot inspection

BY AMY GARDNER
The Washington Post

A Georgia state judge on Friday ordered Fulton County to allow a group of local voters to inspect all 147,000 mail-in ballots cast in the 2020 election in response to a lawsuit alleging that officials accepted thousands of counterfeit ballots.

The decision marks the latest instance of a local government being forced to undergo a third-party inspection of its election practices amid baseless accusations promoted by President Donald Trump that fraud flipped the 2020 contest for President Joe Biden.

The inspection in Fulton County, home to Atlanta, is likely to proceed differently than an audit underway in Maricopa County, Ariz., where Republican state senators ordered county election officials to hand over equipment and ballots to a private company called Cyber Ninjas for examination. That process has come under widespread criticism for lacking security measures and failing to follow the rigorous practices of government recounts. On Thursday, Arizona Secretary of State Katie Hobbs, a Democrat, urged local officials to toss their machines after the audit is complete because their security is now in doubt.

In Georgia, Superior Court Judge Brian Amereo ruled on Friday that the nine plaintiffs and their experts could examine copies of the ballots but never touch the originals, which will remain in the possession of Fulton election officials. Further details of how the inspection will proceed are expected



BEN GRAY AP

Fulton County elections workers process absentee ballots for the Senate runoff election Jan. 5 in Atlanta.

next week, said one of the plaintiffs, Garland Favorito.

The order for the new ballot inspection comes after Georgia officials did three separate audits of the vote last year, including a hand recount, which produced no evidence of widespread fraud.

Fulton County Board of Commissioners Chairman Robb Pitts said it was "outrageous" that the county "continues to be a target of those who cannot accept the results from last year's election."

"The fact remains that Fulton County safely and securely carried out an election in the midst of a public health pandemic," Pitts said in a statement. "It's a shame to see that the 'Big Lie' lives on and could cost the hardworking taxpayers of this county."

A spokesman for Pitts said he plans to meet with the Fulton County attorney to "review all legal options" to block "this waste of taxpayer resources."

Fulton County is one of numerous communities where local residents have recently pushed to revisit the 2020 election results, echoing Trump's false claims of fraud.

In this case, filed in December, the plaintiffs are seeking a declaratory judgment that counterfeit balloting occurred in the county. The judge's ruling Friday was part of the suit's discovery process and allows the plaintiffs to examine the ballots for evidence of their claim.

Aunna Dennis, executive director of Common Cause Georgia, said the lawsuit is another attempt to sow doubt about the 2020 election results – and raise "lots of money" in the process. She suggested that the examination would be used to try to justify more voting restrictions in the state after the GOP-majority legislature passed a sweeping voting law earlier this spring.

"It's a cynical strategy," she said in a statement. "Create artificial 'doubt' about our election processes, and then use that doubt to make voting harder for the voters you don't think will vote for you."

But Secretary of State Brad Raffensperger, a Republican, said the decision would bring a welcome layer of transparency to an election fraught with accusations.



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Queremos darles las gracias por todo su apoyo a los patrocinadores de HAAP. Es importante para nosotros reconocer su dedicacion a nuestros niños y al futuro de nuestra comunidad. Por favor apoyen a estos negocios y organizaciones cuando les sea posible.

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THE HANFORD SITE

Class 3 Permit Modification for the Integrated Disposal Facility Leachate Collection System

PUBLIC COMMENT PERIOD: May 24 – July 23, 2021

The U.S. Department of Energy is holding a 60-day public comment period on a proposed Class 3 modification to the Hanford Dangerous Waste Permit. This proposed modification would support operation of Hanford's Integrated Disposal Facility's (IDF) leachate collection system to allow for disposal of mixed low-level waste in the engineered landfill.

The IDF is a key component of the Hanford Site's Direct-Feed Low-Activity Waste program to treat tank waste, a top priority in Hanford's cleanup mission. Designed similar to Hanford's existing Environmental Restoration Disposal Facility, the IDF will provide permanent, environmentally safe containerized disposition for mixed low-level waste from Hanford operations, including low-activity tank waste that will be vitrified (immobilized in glass) in Hanford's nearby Waste Treatment and Immobilization Plant.

The comment period will run from May 24 through July 23. A virtual public meeting will be held June 24, 2021, at 5:30 p.m. PT. To register for the virtual public meeting:

Visual (presentation only): Click the GoToWebinar link:

<https://bit.ly/3dwPvB8>; ID#: 989-630-931

Audio: Dial (509) 372-3087 (local) or (800) 664-0771 (long distance);

Enter Conference ID: 1333#

Please submit any comments by July 23, electronically (preferred) or by mail to:

Washington State Department of Ecology

3100 Port of Benton Boulevard

Richland, Washington 99354

<https://bit.ly/2Swg7Kl> (preferred)

Copies of the proposed permit modification 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://pdw.hanford.gov>, and in the Hanford Public Information Repositories at <https://go.usa.gov/xVDTS>.

The permittee's compliance history during the application of the relevant permit, is available from the Washington State Department of Ecology contact person.

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



Questions? Contact Jennifer Colborn at Jennifer_M_Colborn@rl.gov

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: Monday, April 26, 2021 2:13:56 PM
Attachments: [image001.png](#)

THE HANFORD SITE

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

Notice of Upcoming Public Comment Period for a Proposed Class 3 Permit Modification for the Integrated Disposal Facility Leachate Collection System

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The DOE and contractor Central Plateau Cleanup Company are requesting a Class 3 modification to the IDF chapter of the permit to add the facility's leachate collection system as a "Miscellaneous Unit" under state regulation WAC 173-303-680.

Proposed modifications include added language to permit chapters and updates to Part A of the permit. The permit establishes requirements to ensure that waste management activities protect human health and the environment. Class 3 modifications are the highest level of permit changes under state regulations and require a 60-day public review process and a public meeting.

The comment period is expected to begin in May 2021. A virtual public meeting is expected to be held in June.

Additional information, including a summary fact sheet, will be provided when the comment period begins.

Questions? Please contact Jennifer Colborn, Hanford Mission Integration Solutions, at Jennifer_M_Colborn@rl.gov or (509) 376-5840.

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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: Monday, May 24, 2021 12:36:55 PM
Attachments: [image001.png](#)
[IDF Leachate Fact Sheet_FINAL.pdf](#)

THE HANFORD SITE

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

Public Comment Period for a Proposed Class 3 Permit Modification for the Integrated Disposal Facility Leachate Collection System

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Visual (presentation only):

Click the GoToWebinar link: <https://bit.ly/3dwPvB8>;
ID #: 989-630-931

Audio:

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

Please submit any comments by July 23, [electronically](#) (preferred) or by mail to:
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354
<https://bit.ly/2Swg7KJ> (preferred)

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 (509) 376-5840.

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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.

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Washington Department of Ecology - Hanford

May 24, 2021 · 🌐



Looking for your input! The U.S. Department of Energy began a new #Hanford comment period today, involving the Integrated Disposal Facility. Find out more information on our website and submit comments by July 23: <https://ecology.wa.gov/.../Nuclear.../Public-comment-periods>

Washington Department of Ecology U.S. EPA, Region 10 U.S. Environmental Protection Agency U.S. Department of Energy Hanford Site U.S. Department of Energy, Office of River Protection

The video thumbnail features an illustration of a person with dark hair, wearing a blue and purple long-sleeved shirt, sitting at a desk and typing on a keyboard. To the right of the person is a large, stylized graphic of an 'OPEN' sign hanging from a chain. Below the sign, the words 'PUBLIC COMMENT PERIOD' are written in a bold, black, sans-serif font. At the bottom left of the thumbnail is the logo for the Washington Department of Ecology, which includes a stylized blue and white wave icon and the text 'DEPARTMENT OF ECOLOGY State of Washington'. At the bottom right, the text 'Tell us what you think.' is displayed. The video player interface at the bottom shows a progress bar at 0:00 / 0:07, a settings gear icon, a share icon, a copy icon, and a volume icon.



Ecology - Hanford @ecyHanford · May 24, 2021



Looking for your input! @HanfordSite/@RiverProtection (@ENERGY) began a new #Hanford comment period today, involving the Integrated Disposal Facility. Find out more information on our website and submit comments by July 23: ecology.wa.gov/Waste-Toxics/N... @EcologyWA @EPAnorthwest @EPA

This version of the video thumbnail is identical to the one above, but includes engagement metrics in the bottom left corner: '0:03' and '405 views'. A hand cursor icon is visible on the left side of the video frame, indicating it is a video player interface.

