



Response to Comments Integrated Disposal Facility Class 3 permit modification for leachate collection system

Dec. 5, 2022 – Jan. 20, 2023

For the **Nuclear Waste Program**

Washington State Department of Ecology

Richland, Washington

June 2023, Publication 23-05-005



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¹ <https://apps.ecology.wa.gov/publications/summarypages/2305005.html>

² www.ecology.wa.gov/contact

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Southwest Region 360-407-6300	Northwest Region 206-594-0000	Central Region 509-575-2490	Eastern Region 509-329-3400
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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.)

The Response to Comments is the last step before issuing the final permit, and its purpose is to:

- Specify which changes, 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	<i>Integrated Disposal Facility Class 3 permit modification for leachate collection system, Dec. 5, 2022 – Jan. 20, 2023</i>
Permit	<i>Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Integrated Disposal Facility for leachate collection system</i>
Permittees	U.S. Department of Energy Central Plateau Cleanup Company LLC
Original Issuance date	Sept. 28, 1994
Effective date	July 9, 2023

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

Ecology proposed this Class 3 permit modification to the Hanford Site-Wide Permit Revision 8C. The modification affects the Dangerous Waste Portion for the Treatment, Storage, and Disposal of Dangerous Waste for the Integrated Disposal Facility, located in Part III, Operating Unit Group 11.

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.

This permit modification allows the permittees to operate two Leachate Collection System (LCS) Dangerous Waste Management Units (DWMUs), located north of the IDF Disposal Cells, as miscellaneous units to store liquid leachate in accordance with Washington Administrative Code (WAC) 173-303-680. The miscellaneous units, also called Leachate Collection Units (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 modification provides detailed information which supports operation of two LCS DWMUs in 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

We encouraged public comment on the draft IDF LCS Permit Modification during a 45-day, public comment period held Dec. 5, 2022 – Jan. 20, 2023.

We notified the public by:

- Mailing a public notice announcing the comment period to 928 members of the public.
- Placed a public announcement legal classified notice in the Tri-City Herald on Dec. 4, 2022.
- Emailed a notice announcing the start of the comment period to the Hanford-Info email list, which has 1,469 recipients.
- Posted the comment period notice on the Washington Department of Ecology – Hanford’s Facebook and Twitter pages.

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

- Focus sheet
- Transmittal letter
- Fact Sheet for the proposed IDF LCS Permit Modification
- Draft IDF LCS Permit Modification

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

- Focus sheet
- Classified notice 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 LCS Permit modification. The comments and responses are in [Attachment 1](#).

Commenter	Organization
Anonymous Citizen	Citizen
Guy Bishop	Citizen
Department of Energy	Agency
Central Plateau Cleanup Company	Organization
Hanford Challenge	Organization
Oulwa Research Studio	Organization

Attachment 1: Comments and Responses

Description of comments:

Ecology accepted comments from Dec. 5, 2022 – Jan. 20, 2023. 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

Publication 22-05-024 states in a couple of places that "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 (WTRD) (Draft Condition 11/.11.E.4) through a separate class 3 permit modification to move IDF into Active Life.

I appreciate very much that Ecology is requiring a secondary waste form technical requirements document, which I hope will allow thorough review and perhaps prevent off-site treatment of brines, acetonitrile effluent, and other Hanford tank waste derivatives at PFNW, and instead encourage on-site treatment.

I looked at the permit conditions for this draft permit (markup of the last modification dated September 1, 2022), and found that both sections 111.11.E.5 and 111.11.E.4 are not there. Please see <https://fortress.wa.gov/ecy/ezshare/NWP/Leachate/IDF Conditions.pdf> . This file ends at 111.11.E.1.

Ecology's R2C 22-05-024 clearly says the addition of these permit conditions was done in the past tense, so I was disappointed to find those sections missing, particularly as they support the current comment period.

I checked the current permit conditions at <https://fortress.wa.gov/ecy/nwp/permitting/hdwp/rev/8c/IDF/IDF conditions.pdf> , and also found the new text missing .

I checked the DRAFT permit conditions from two previous public comment periods and found updated permit conditions showing the markups from February 1, 2021 and from August 26 , 2021. Both of these (much) earlier modifications contain permit conditions II1.11.E.4 and 111.11.E.5. Unfortunately, they are from prior public comment periods and will have been removed from public view.

Public comment on new changes when the old ones are apparently not incorporated is challenging. It would help to have an up to date copy of the composite modified permit conditions during each consecutive public comment period so that everyone can see the whole context. It would also help to ensure continued public access to the review files from prior comment periods. Phased permitting appears to be detrimental to public accessibility .

Can Ecology provide a copy of the Quality Assurance (QA) plan that governs configuration management for permit changes and comment periods? It's important that intended sections do not drop out inadvertently or are not negotiated away.

Can Ecology ensure that the Secondary Waste Form Technical Requirements Document is a single integrated document with a single effective date? Prior mass balance commitments by DOE have been allowed to degenerate into a collection of non-integrated and out of date work

products that are useless for supporting technical conclusions (Milestone M-062-50). I would appreciate anything Ecology can do to avoid this in the future.

Thank you for considering these comments.

Response to I-1-1

Thank you for your comment.

Apart from this permit modification to add two LCS DWMUs into the IDF Permit , there is a separate Class 3 permit modification (often called IDF active-life or IDF Operating modification), which adds three DWMUs to the IDF Permit (additional disposal cell, a storage pad, and a treatment pad).

Ecology held a 45-day public comment period for the IDF active-life permit modification from 9/13 to 10/28/2021, and re-opened another 45-day public comment period from 7/25 to 9/9/2022. We made the draft permit files, unit-specific permit conditions, and supplemental information available to public to review during the public comment periods. Addition of SWTRD conditions was made in the draft permit modification and were available to the public during the public comment periods. After the re-opened public comment period, Ecology reviewed all the public comments received to make a final permit decision.

For the IDF active-life permit modification, Ecology plans to make a final permit decision in May 2023 on the Class 3 permit modification in accordance with WAC 173-303-840(8). If Ecology decides to approve and issue the final permit modification, SWTRD conditions will be incorporated into the IDF Permit as appropriate and made available to the public to locate in the unit-specific permit conditions. Any changes made between the draft permit modification and final permit modification will be explained in Ecology's letter for final issuance. Furthermore, All public comments received from the public comment periods as well as Ecology's responses will be available to the public upon final issuance, as well.

Thank you again for reviewing the draft permit modification.

I-2: GUY BISHOP

Comment I-2-1

I strongly support the permit modification to allow Integrated Disposal Facility (IDF) leachate storage and handling in the designated storage tank design. This permit modification should be approved by the Department of Ecology in the shortest possible time so that IDF readiness will not impact the startup of the Direct Feed Low-Activity Waste (DFLAW) facility. It should be made clear that the leachate collected by IDF will be almost entirely rain water or snow melt--in other words, simply water. DFLAW will not be sending ANY liquid waste to IDF for disposal. While some waste sent to IDF may have surface radioactive contamination, such contamination will be within the waste acceptance criteria set by IDF, which is also approved by Ecology. Waste sent to IDF that exceeds the acceptance criteria will not be permitted into the IDF. It is possible that the rain/snow melt could carry trace amounts of contamination from this waste

into the leachate over time. However, such contamination will be minor and could not constitute any threat to the environment or public by the leachate collection system operation. Thus, there is no danger to the environment nor to the public by approval of this permit modification. I ask that the permit modification be approved in the shortest possible time. I am a retired engineer with over 40 years of nuclear experience.

Response to I-2-1

Thank you for your comment.

WAC 173-303 defines leachate as "any liquid, including any components suspended in the liquid, that has percolated through or drained from dangerous waste". In the IDF, Leachate is liquid from precipitation and the application of water or nonhazardous liquids for dust suppression that filters through the landfill to the leachate collection and removal system.

Ecology disagrees that leachate is "simply water" or "could not constitute any threat to the environment or public by the leachate collection system operation". Leachate from the IDF disposal cells is a liquid mixed waste which can pose hazards to human health and environment if not handled safely at the IDF. Therefore this class 3 permit modification adds two LCS DWMUs to the IDF permit while ensuring proper operation of the LCUs and the associated ancillary equipment at the IDF.

A-1: DEPARTMENT OF ENERGY

Comment A-1-1

Permit Condition III.11.F.1.a.

Leachate in the LCRS (primary sump) will be sampled and analyzed monthly for the first year of operation of the facility and quarterly thereafter, as described in Appendix C7A, "Sampling and Analysis Plan for IDF Leachate." 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.

Recommendation: Revise permit condition to say: "Leachate in each of the LCRS primary sumps will be sampled and analyzed monthly for the first year of operation of the facility and quarterly thereafter, as described in Appendix C7A, "Sampling and Analysis Plan for IDF Leachate." 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."

Response to A-1-1

Thank you for your comment.

Ecology agrees with the suggested editorial changes for the first sentence as it adds a clarity in the sampling requirement of leachate in the LCRS primary sumps.

For the final issuance of this permit modification, Ecology revised the subject sentence, as suggested;

"Leachate in each of the LCRS primary sumps will be sampled and analyzed monthly for the first year of operation of the facility and quarterly thereafter, as described in Appendix C7A, "Sampling and Analysis Plan for IDF Leachate."

Comment A-1-2

Permit Condition III.11.F.3.a At least 180 days prior to initial waste placement, the Permittees shall submit to Ecology for approval a Sub-Surface Liquids Monitoring and Operations Plan (SLMOP) for the SLDS to include the following: monitoring frequency, pressure transducer configuration, liquid collection and storage processes, sampling and analysis and response actions. The SLMOP shall be approved by Ecology prior to placement of waste in the IDF, and incorporated into the Permit as a Class ¹1 modification

Response: The obligations addressed by this permit condition have been fulfilled in this Class 3 permit modification deeming this condition no longer applicable.

Recommendation: Delete the permit condition.

Response to A-1-2

Ecology agrees with this comment that the requirement set forth in the subject permit condition has been met through this permit modification. For the final issuance of this permit modification, Ecology deleted this permit condition as suggested.

Comment A-1-3

Permit Condition III.11.F.4.g

The Permittees will monitor liquids in the LCS to ensure the action leakage rate (Appendix 4C) is not exceeded.

Response: The language in this permit condition could be updated to improve the accuracy of how liquids are monitored.

Recommendation: Replace the permit conditions with the following:

Permit Condition III.11.F.4.g

The Permittees will monitor liquids in each of the LCS combined sumps to ensure the action leakage rate (Appendix 4C) is not exceeded.

Response to A-1-3

Ecology agrees with the suggested editorial changes for this permit condition as it adds a clarity in monitoring and managing requirement of the LCS.

For the final issuance of this permit modification, Ecology revised this permit condition, as suggested;

"The Permittees will monitor liquids in each of the LCS combined sumps to ensure the action leakage rate (Appendix 4C) is not exceeded."

O-1: CENTRAL PLATEAU CLEANUP COMPANY

Comment O-1-1

This comment provided is the same as Comments # A-1-1 through A-1-3.

Response to O-1-1

Thank you for your comment.

This comment provided is the same as Comments # A-1-1 through A-1-3. See Ecology's responses to Comments # A-1-1 through A-1-3.

O-2: HANFORD CHALLENGE

Comment O-2-1

Improve Public Accessibility: Public accessibility to engage in meaningful comment is vital for Hanford cleanup. The added burdens to accessing information is an issue that must be addressed. We ask the State to provide a process that ensures information is clearly presented to the public for comment. Specifically:

- There is not a uniform process on how permit revisions are presented to the public for comment and key information is not available online, which creates confusion. We suggest providing a key on 'how to review permit revisions for comment' to increase public accessibility. Each key should set the commenter up to easily begin their review and remove the steps of
 - (1) reaching out to the State to confirm which revision color(s) are open for comment and
 - (2) reviewing the Focus or Fact Sheets to confirm which permit files are new¹.

Response to O-2-1

Thank you for your comment.

Ecology prepared Fact Sheet for the proposed draft permits per WAC 173-303-840(2). In the Fact Sheet were included the key information to help public members to review the draft permit modification. The following information was provided in the Fact Sheet for this class 3 permit modification:

- *New permit file was each noted in the list of IDF permit files provided (pages 6 and 7 in Fact Sheet).*
- *Draft changes are represented in the following manner (page 7 in Fact Sheet):*

¹Providing new permit files in non-revision black text causes confusion as to whether they are open for comment. See Appendixes C7 Leachate Monitoring Plan, C7A Sampling and Analysis Plan for IDF Leachate, C8 Sub-surface Liquids Monitoring and Operations Plan, and 11A Visual Sampling Plan Report Documentation.

- *"Modifications to existing permit documents appear in red-line strike out in the draft permit, and only the new text (red-line) is open for public comment during this comment period.*
- *Text in the new permit documents identified above is not shown in red-line strike out, and the entire permit document is open for public comment."*

We are committed to continue improving public accessibility. In the meantime, Ecology encourages any member of public with questions to reach out to us during the public comment period.

Comment O-2-2

- We suggest providing a definitions chapter for each comment period. In the latest revisions, the term 'leachate collection tank(s)' replaces the word 'tank(s)' with unit(s), system, or system dangerous waste management unit(s) and thus, changing the easily understood term 'tank(s)' to the more specific industry acronyms LCUs, LCS, and LCS DWMUs². We suggest taking the opposite approach by requiring common terms be defined with industry terms/acronyms whenever possible to remove the barrier that industry language creates. For example, 'Leachate Tanks' could be defined as the technical term/acronym Leachate Collection System Dangerous Waste Management Units (LCS DWMUs) with a brief explanation. This change not only makes the information more easily read, understood, and commented upon, but also should maintain compliance with language requirements.

Response to O-2-2

Through this class 3 permit modification to add two LCS DWMU to the IDF Permit, Ecology replaced "Leachate Collection Tank" with "Leachate Collection Unit (LCU)" to the extent possible in the applicable permit files. The basis for this change is included in the Fact Sheet provided during the 45-day public comment period, as follows:

"LCUs look like and function similar to tank units. However, the system bottom was designed as a geomembrane liner system instead of a solid bottom, which does not meet the regulatory definition of a tank per WAC 173-303-040. Additionally, the liner system does not provide structural integrity independently; therefore, the system cannot pass a structural integrity test as a tank system. Since the LCS DWMUs do not meet the necessary design requirements for a tank system, Ecology determined these LCS DWMUs should be permitted as miscellaneous units in accordance with WAC 173-303-680, Miscellaneous Units. Per WAC 173-303-680(2), permit terms and provisions from both WAC 173-303-640, Tank systems, and WAC 173-303-650, Surface impoundments, are used for these miscellaneous units, as applicable."

For the draft permit modification, Ecology added a definition of LCS in the Unit Specific Conditions in page. 4 as "miscellaneous unit also called LCU to store leachate collected from the IDF disposal cells and ancillary equipment for the transfer of leachate from the disposal cells, in accordance with WAC 173-303-680. IDF is permitted to operate two LCS DWMUs. Ancillary

² See Chapter 3 Waste Analysis Plan, page 11; Chapter 4 Process Information, pages 16, 21, 30, and 34; Chapter 6 Procedures to Prevent Hazards, page 8; and etc.

equipment is comprised of the Crest Pad Building, Leachate Transfer Building, combined sump, and transfer piping."

LCS is also described in Section 4.3 in Chapter 4 Process Information. Currently unit-specific definitions are included in unit Specific Conditions, but not each permit file. Ecology appreciates this comment with suggestions and is committed to continue improving public accessibility.

Comment O-2-3

- We suggest providing links to all permit documents and documents incorporated by reference³ during each comment period to increase public accessibility. The current phased permitting limits the commenter's access to the documents that are open for public comment. To understand and comment on the revisions without all the documents ranges from challenging to impossible. Requiring this change would not only increase public accessibility, but also provide additional accountability.

Response to O-2-3

Operation and maintenance procedures are not included among the IDF Permit as they are the Permittees' internal procedures. For IDF Permit, Chapter 4, Process Information, covers required responses in the event of spill from a LCU to the environment (Section 4.3.11) and when LCU action leakage rate is exceeded (Section 4.3.12. See also Appendix 4C, Facility Response Action Plan). Ecology also added the following permit conditions as applicable:

- *III.11.F.4.c*
If there is an unexpected change in liquid level or observed evidence of a leak from the LCU and/or ancillary equipment, resulting in a spill into the environment, the Permittees must follow the required actions detailed in the applicable section of Chapter 4.0, "Process Information," in accordance with WAC 173-303-650(5) and WAC 173-303-640(7).
- *III.11.F.4.d*
Permittees will monitor and record leachate removal from the combined sump for comparison to the ALR as described in Appendix 4C, "Facility Response Action Plan." If the leachate leakage rate in a combined sump exceeds the ALR, the Permittees will implement the Ecology approved response action plan.

The IDF Permit conditions III.11.E.5 were outside the scope of this permit modification as they were added to the draft unit specific conditions through a separate Class 3 permit modification (often called IDF active-life modification or IDF Operating modification), which adds three DWMUs to the IDF Permit (additional disposal cell, a storage pad, and a treatment pad). Ecology held a 45-day public comment period for the IDF active-life modification from 9/13 to 10/28/2021, and re-opened another 45-day public comment period from 7/25 to 9/9/2022. Ecology plans to make a final permit decision in May 2023 on the Class 3 permit modification in

³See, e.g., Appendix 4A1 Phase 1 Critical Systems Design Report, page 98 ("Operation and maintenance procedures for the tank will establish the required responses to be performed if leakage is detected." Emphasis added as O&M Procedures aren't available to the public and this is the only remaining reference to tank(s).) and Publication 22-05-024, pages 13 and 15 (states that "Ecology added Permit Conditions [III.11.E.5 and III.11.E.4]," but neither are added to the 09/22/22 draft permit. Emphasis added.)

accordance with WAC 173-303-840(8). If Ecology decides to approve and issue the final permit modification, the subject permit conditions will be incorporated into the IDF Permit as appropriate and made available to the public to locate in the unit-specific permit conditions.

Comment O-2-4

Address IDF Waste Stream Uncertainty: The future use of Integrated Disposal Facility (IDF) includes important unknown factors. A concern previously raised is the uncertainty about what contaminants will end up in IDF that could then end up in the leachate collection system (LCS). We ask that the permit specifically address the unknown variables that contaminant uncertainty creates, focusing on testing as available, monitoring consistently, and thorough action plans to help ensure the LCS is safely and effectively able to manage the IDF waste stream. Specifically:

- We suggest requiring a periodic review of assumptions that covers bounding conditions. For example, as more clarity emerges about waste that will be disposed of in IDF and collected through LCS, a periodic review of assumptions will help ensure the LCUs, LCS, LCS DWMUs, and the IDF leachate transport trucks will be adequately and safely equipped to handle the IDF contaminated leachate.

Response to O-2-4

Apart from this proposed modification to add two LCS DWMUs into the IDF Permit, there is a separate Class 3 permit modification (often called IDF active-life modification or IDF Operating modification), which adds three DWMUs to the IDF Permit (additional disposal cell, a storage pad, and a treatment pad). Ecology held a 45-day public comment period for the IDF active-life modification from 9/13 to 10/28/2021, and re-opened another 45-day public comment period from 7/25 to 9/9/2022.

Since the re-opened public comment period was closed on 9/9/2022, Ecology has been actively reviewing the public comments received from the public comment periods to make a final permit decision. Ecology plans to make a final permit decision in May 2023 on the Class 3 permit modification in accordance with WAC 173-303-840(8). If Ecology decides to approve and issue the final permit modification, the final permit modification would address the uncertainty in the types of waste streams as well as future impacts to the groundwater from waste going to the IDF disposal cells.

After reviewing public comments received during the IDF LCS permit modification, Ecology revised the existing condition to add clarity and enforceability in leachate sampling requirements, consistent with the newly added permit files, Appendix C7, Leachate Monitoring Plan, and Appendix C7A, Sampling and Analysis Plan for IDF Leachate.

For the final issuance of this permit modification, the revised condition is as follows;

III.11.F.1.a

"Leachate in each of the LCRS primary sumps will be sampled and analyzed monthly for the first year of operation of the facility and quarterly thereafter, as described in Appendix C7A, "Sampling and Analysis Plan for IDF Leachate. 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."

See Ecology's response to Comment #A-1-1 for the above permit condition.

Comment O-2-5

- We suggest including testing and monitoring for air emission hazards and contingency plans. It is concerning that the only mention of the air under Procedures to Prevent Hazards is an assumption that "based on the waste disposed in IDF, the resulting leachate is not anticipated to present an air emission hazard."⁴

Given the uncertainties regarding the waste disposed of in IDF, it is confusing how this assumption was reached. Further explanation and emission protections seem warranted.

Response to O-2-5

Apart from this proposed modification to add two LCS DWMUs into the IDF Permit, there is a separate Class 3 permit modification (often called IDF active-life modification or IDF Operating modification), which adds three DWMUs to the IDF Permit (additional disposal cell, a storage pad, and a treatment pad). Ecology held a 45-day public comment period for the IDF active-life modification from 9/13 to 10/28/2021, and re-opened another 45-day public comment period from 7/25 to 9/9/2022.

Since the re-opened public comment period was closed on 9/9/2022, Ecology has been actively reviewing the public comments received from the public comment periods to make a final permit decision. Ecology plans to make a final permit decision in May 2023 on the Class 3 permit modification in accordance with WAC 173-303-840(8). If Ecology decides to approve and issue the final permit modification, Section C.8 in Addendum C, Process Information, would discuss the applicability of air emission standards (40 CFR 264, Subpart AA through CC standards) based on the waste going to the IDF for disposal.

Comment O-2-6

- We suggest including a verification process for IDF-generated wastes rather than making all "IDF-generated wastes [] exempt from waste confirmation and receipt activities."⁵ This exempt process seems to leave room for human error and make assumptions that other confirmation processes have dealt with the IDF leachate contaminant uncertainty. Without a verification process, it is unclear what measures are in place to help ensure only certain contaminants are left in IDF.

Response to O-2-6

IDF-generated waste streams are exempt from waste confirmation and receipt activities as the waste is generated by known processes within the perimeter of IDF. However, IDF-generated waste streams must be appropriately characterized and profiled.

⁴ Chapter 6 Procedures to Prevent Hazards, page 14.

⁵ Chapter 3 Waste Analysis Plan, page 15.

Apart from this proposed modification to add two LCS DWMUs into the IDF Permit, there is a separate Class 3 permit modification (often called IDF active-life modification or IDF Operating modification), which adds three DWMUs to the IDF Permit (additional disposal cell, a storage pad, and a treatment pad). Ecology held a 45-day public comment period for the IDF active-life modification from 9/13 to 10/28/2021, and re-opened another 45-day public comment period from 7/25 to 9/9/2022.

Since the re-opened public comment period was closed on 9/9/2022, Ecology has been actively reviewing the public comments received from the public comment periods to make a final permit decision. Ecology plans to make a final permit decision in May 2023 on the Class 3 permit modification in accordance with WAC 173-303-840(8). If Ecology decides to approve and issue the final permit modification, Waste characterization and profiling requirements for IDF-generated waste would be covered in Addendum B, Waste Analysis Plan.

The leachate generated by IDF is considered to be an IDF-generated waste and is accepted at IDF according to the acceptance process for IDF-generated wastes, which is different from the acceptance process for non-IDF-generated wastes. Leachate will be sampled to meet waste acceptance criteria at the receiving Treatment Storage and Disposal Facility, in accordance with permit condition III.11.F.1.a.

See Ecology's response to Comment #A-1-1 for the above permit condition (III.11.F.1.a).

Comment O-2-7

- We suggest providing thorough information on monitoring and action plans. There are several sections lacking vital information throughout the permit materials. For example:
 - “During Active Life, the above ground portions of the system and tank level indicators are inspected daily. Leak detection and level sensor inspections occur annually.”⁶ Given the drastic difference between daily above ground inspections and annual sensor inspections, it leads one to question: Why only annual? Are annual inspections adequate?

Response to O-2-7

The Permittees explained to Ecology that those instruments are inspected when they are pulled for annual calibration. The basis for the annual frequency is the manufacturer's recommended routine calibration of the level sensors. This is the same calibration frequency commonly used across other waste disposal sites with leachate collection systems on the Hanford Site.

Ecology thinks the annual inspections for the instruments adequate because during the active-life:

- *The above ground portions of the system and tank level indicators will be inspected daily (Section 6.2.3.3 in Chapter 6).*

⁶Chapter 6 Procedures to Prevent Hazards, page 11. Emphasis added. See also Appendix C8 Sub-surface Liquids Monitoring and Operations Plan, page 7 (provides for weekly monitoring of the Secondary Leak Detection System).

- *The combined sump will be inspected weekly to monitor and record including amount of liquids removing from sump (Table 6-3 in Chapter 6).*
- *The LCRS flow meters will be checked, on a weekly basis, if the amount of leachate pumped from the LCRS sumps corresponds to the amount accumulated in the LCUs to verify proper function of the LCRS (Section 6.2.3.4 in Chapter 6 and Section 7.2.1 in Appendix C7)*
- *The LDS flow meter will be used to check, on a weekly basis, if the amount of leachate pumped from the LDS sumps corresponds to the amount accumulated in the LCUs to verify proper function of the LDS (Section 7.2.2 in Appendix C7)*
- *The SLDS level sensor will be used once per calendar year to monitor and record SLDS liquid level (Section C8.2.1 in Appendix C8).*

Even if one of the instruments stop working properly months before the next scheduled annual inspection, one or more of the above required monitoring and inspection should provide the operator an indication if the instrument is not working properly for further investigation. Therefore, Ecology agrees with annual inspection for those instruments.

Comment O-2-8

- “Leachate from the leachate collection and removal system (LCRS) shall be sampled and analyzed monthly for the first year of disposal cell operation, and quarterly thereafter[.] [] Leachate from the leak detection system (LDS) shall be sampled semi-annually[.]”⁷ It is unclear why inspections of the LCRS should change from monthly to quarterly or what semi-annual sampling means.⁸

Response to O-2-8

A monthly frequency was set for sampling leachate from the LCRS for the first year of waste disposal operation to support IDF RCRA monitoring activities. This frequency of sampling during the first year of waste disposal operation is more conservative to support the IDF startup operation and will be reduced to quarterly sampling after one year.

Semi-annual sampling means sampling every six months as noted in Appendix C7A. The LDS is structurally similar to and located under the LCRS for collecting and conveying leachate from the LCRS into the LDS sump for detection, and serves as a secondary LCRS for each IDF disposal cell. Leachate collected in the LDS sump will be measured to determine any leakage through the primary liner. A semi-annual sampling was set as an adequate frequency for sampling leachate from LDS.

Comment O-2-9

- “Following removal of wastes from the LCS DWMUs, the concrete foundation for each building will be visually inspected for contamination (e.g., stains or residuals), cracks or other openings that reach the underlying soil.”⁹ It is unclear whether there are periodic

⁷ Appendix C7A Sampling and Analysis Plan for IDF Leachate, page 7.

⁸ Semi-annually has varied definitions, it is defined in parenthesis elsewhere within Appendix C7A as “(i.e. every six months).” Appendix C7A Sampling and Analysis Plan for IDF Leachate, page 9.

⁹Chapter 11 Closure, page 12.

checks of the building and the soil prior to removal of wastes, specific inspection processes, or other groundwater monitoring operations.

Response to O-2-9

Chapter 11 covers closure activities. Therefore, the subject sentence refers to a visual inspection following removal of wastes from the LCS DWMUs, but prior to removal of LCS structures and underlying soil, surface soil inspection, and soil sampling of LCS for the closure activities. (See Section 11.2.2.2 and 11.2.2.3 in Chapter 11)

Periodic inspection for the LCS during the IDF active-life operation is covered in Chapter 6, Procedures to Prevent Hazards.

There is a groundwater monitoring program at the IDF in accordance with WAC 173-303-645 and is included in Chapter 5, Groundwater Monitoring. Please note that apart from this proposed modification to add two LCS DWMUs into the IDF Permit, there is a separate Class 3 permit modification (often called IDF active-life modification or IDF Operating modification), which adds three DWMUs to the IDF Permit (additional disposal cell, a storage pad, and a treatment pad). Ecology held a 45-day public comment period for the IDF active-life modification from 9/13 to 10/28/2021, and re-opened another 45-day public comment period from 7/25 to 9/9/2022.

Since the re-opened public comment period was closed on 9/9/2022, Ecology has been actively reviewing the public comments received from the public comment periods to make a final permit decision. Ecology plans to make a final permit decision in May 2023 on the Class 3 permit modification in accordance with WAC 173-303-840(8). If Ecology decides to approve and issue the final permit modification, the final permit modification would replace Chapter 5, Groundwater Monitoring with Addendum D, Groundwater Monitoring Plan. Addendum D, Groundwater monitoring plan will discuss the IDF groundwater monitoring program in details to support operations for the IDF.

Comment O-2-10

- “If IDF identifies a change in analytical data, additional analysis may be required.”¹⁰ This part is quite vague, it is unclear at what point additional analysis is required, who would determine this, or whether it would be reported and/or logged.

Response to O-2-10

The last sentence in Section C7A.3.5 reads, "Furthermore, review of QC data is used to determine whether analyses have met the data quality requirements specified in this SAP."

Section C7A.1.3 Project Management explains the project organization, roles, and responsibilities for leachate sampling activities at IDF.

Determination for additional analysis will be made by the Project Manager (or designee) following the review of QC data by Sample Management and Reporting group.

¹⁰Appendix C7A Sampling and Analysis Plan for IDF Leachate, page 10.

Comment O-2-11

- “Since liner performance guarantees are required in the technical specifications for the tank manufacturer for three years following installation, it is likely that the inspection program would be initially set up around this time frame and gradually be increased over the life cycle of the tank.”¹¹ Given the IDF leachate contaminant uncertainty, it is irresponsible to assume to rely on a manufacturer guarantee. We suggest including proactive inspections and a liner inspection process.

Response to O-2-11

The subject sentence is an existing sentence; therefore, it is out of scope for this modification. The referred activity is the Permittees' maintenance activity outside the IDF Permit coverage.

Through the IDF Permit, the Permittees are required to conduct daily inspection at the LCUs to "Verify tank structure is in good condition (e.g., no significant dents, damage, or rust), verify no evidence of leaks, and check dangerous waste warning signs to ensure signs are in the proper locations, visible, and in good condition" (See Table 6.3 in Chapter 6).

In addition to the daily inspections, the Permittees will monitor liquids in each of the LCS combined sumps to ensure the action leakage rate (Appendix 4C) is not exceeded per IDF Condition III.11.F.4.g.

As described in Section 4CB of Appendix 4C, "the ALR for a surface impoundment is the maximum design flow rate that the leak detection system can remove without the fluid head on the bottom liner exceeding 1 foot... The ALR for each IDF LCU is 579 gallons per acre per day... In accordance with WAC 173-303-650(10)(b), the flow rate used to determine if the ALR has been exceeded will be calculated as the average daily flow rate into the combined sump from the LCU leak detection piping, expressed as gallons per acre per day. This calculation will be performed on a weekly basis during the active (operational) life of the LCU." Section 4CB.1.2 in Appendix 4C details required response actions if the ALR is exceeded. See also Section 4.3.12 in Chapter 4 for description about LCS ALR and response action plan.

Comment O-2-12

- “If sampling activities deviate from the frequencies identified in this SAP, an explanation will be documented in the Hanford Facility Operating Record (IDF portion).”¹² It is unclear how this is an effective process if deviations are simply noted, not reported, investigated, or otherwise acted upon regardless of the number of deviations.

Response to O-2-12

Sampling record and documentation is subject to Ecology's regular compliance inspection. At the inspection deviation and action taken to address will be assessed.

¹¹Appendix 4A1 Phase 1 Critical Systems Design Report, page 98. Emphasis added.

¹² Appendix C7A Sampling and Analysis Plan for IDF Leachate, page 7.

Comment O-2-13

- “Each LCU is designed and installed to prevent run-on from entering the unit. The units’ steel walls and aluminum dome covers prevent precipitation run-on from entering the unit. As no precipitation can enter the unit to contact the waste, no runoff can occur.”¹³
13 In the testing process was the runoff prevention 100% effective? Are there no extenuating circumstances in which runoff can occur? Such information should be acknowledged and a plan should be in place for the possibility. In addition, an explanation on the difference between run-on and runoff would be helpful.

Response to O-2-13

According to WAC 173-303-040, "runoff" is defined as any rainwater, leachate, or other liquid which drains over land from any part of a facility. "Run-on" is defined as any rainwater, leachate, or other liquid which drains over land onto any part of a facility.

As described in Section 4.3.4, each LCU has an aluminum fabricated dome cover, which does not allow precipitation to enter, precluding runoff from occurring (WAC 173-303-395, Other general requirements) while maintaining adequate freeboard.

Comment O-2-14

- We appreciate Ecology’s requiring a Secondary Waste Form Technical Requirements Document.¹⁴ We hope it will allow for thorough review and prevent off-site treatment of brines, acetonitrile effluent, and other Hanford tank waste derivatives at Perma-Fix Northwest (PFNW) located within Richland city limits.¹⁵ We have previously commented on PFWN’s disturbing history of accidents, violations, findings, and non-compliances that raise serious concerns about its treating waste from Hanford Nuclear Site. We ask that the State prohibit IDF waste transfers to PFWN explicitly.

Response to O-2-14

Current plan for treatment of IDF leachate is at the LERF/ETF.

In Section 3.3.1 in Chapter 3; "IDF leachate will be stored in the Leachate Collection System until transfer to the Liquid Effluent Retention Facility/Effluent Treatment Facility (LERF/ETF) (or other permitted TSD) for treatment. Sampling and analysis is performed to ensure the leachate meets the acceptance criteria of the receiving facility and to meet RCRA monitoring requirements".

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."

Apart from this proposed modification to add two LCS DWMUs into the IDF Permit, there is a separate Class 3 permit modification (often called IDF active-life modification or IDF Operating modification), which adds three DWMUs to the IDF Permit (additional disposal cell, a storage

¹³Chapter 6 Procedures to Prevent Hazards, page 13.

¹⁴ Publication 22-05-024, pages 13 and 15.

¹⁵ See Risky Business at Perma-Fix Northwest, <https://www.HanfordChallenge.org/pfnw>, 12/4/2020.

pad, and a treatment pad). Ecology held a 45-day public comment period for the IDF active-life modification from 9/13 to 10/28/2021, and re-opened another 45-day public comment period from 7/25 to 9/9/2022. Since the re-opened public comment period was closed on 9/9/2022, Ecology has been actively reviewing the public comments received from the public comment periods to make a final permit decision. Ecology plans to make a final permit decision in May 2023 on the Class 3 permit modification in accordance with WAC 173-303-840(8). If Ecology decides to approve and issue the final permit modification, the final permit modification would address the detailed information about waste streams and IDF waste disposal operation.

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-2-15

- We suggest requiring a current "Sampling and Analysis Plan to support clean closure of the LCS DWMUs" with periodic updates to the public as information becomes available rather than "no later than six (6) months prior to acceptance of the last shipment of waste at the IDF."¹⁶ This change would proactively help all invested in Hanford Nuclear Site cleanup decisions understand what 'clean closure' means for IDF as a permanent landfill.

Response to O-2-15

The subject condition (III.11.F.4.f) reads, "No later than six (6) months prior to acceptance of the last shipment of waste at the IDF, the Permittees will submit a permit modification request to Ecology to add Sampling and Analysis Plan to support clean closure of the LCS DWMUs. The Sampling and Analysis Plan will include the closure performance standards in accordance with WAC 173-303-610(2), as described in Chapter 11.0."

The objective of Appendix C7A, Sampling and Analysis Plan, is sampling of leachate from the IDF disposal cells leachate collection systems. This Appendix does not address sampling and analysis plan or closure performance standards to support closure activities for the LCS DWMUs. Ecology added this permit condition specifically to require the Permittees to submit a new permit modification request to add SAP for the LCS DWMUs with the applicable CPS to support clean closure of the LCS DWMUs.

Comment O-2-16

- We suggest prioritizing worker health and safety by providing both required and optional training opportunities for Hanford Nuclear Site Workers beyond the one training offered titled 'Leachate Operations Qualification Card.'¹⁷ For example, new and/or refresher trainings on IDF operations and spill protocols.

¹⁶ Unit Specific Conditions, page 15.

¹⁷ Chapter 8 Personnel Training, page 8.

Response to O-2-16

Apart from this permit modification to add two LCS DWMUs into the IDF Permit , there is a separate Class 3 permit modification (often called IDF active-life modification), which adds three DWMUs to the IDF Permit (additional disposal cells, a storage pad, and a treatment pad).

Ecology held a 45-day public comment period for the IDF active-life modification from 9/13 to 10/28/2021, and re-opened another 45-day public comment period from 7/25 to 9/9/2022. A list of trainings required for IDF operation was included in Addendum G, Personnel Training, was made available to the public during the public comment periods. Since the re-opened public comment period was closed on 9/9/2022, Ecology has been actively reviewing the public comments received from the public comment periods to make a final permit decision. Ecology plans to make a final permit decision in May 2023 on the Class 3 permit modification in accordance with WAC 173-303-840(8). If Ecology decides to approve and issue the final permit modification, the training information will be incorporated into the IDF Permit as appropriate and made available to the public to locate in Addendum G, Personnel Information.

Comment O-2-17

Increase Specificity of Environmental, Health, and Safety Protections : We appreciate the inclusion of environmental, health, and safety protections¹⁸ and the addition of procedures that had yet to be provided.¹⁹ We have concerns about seemingly incomplete protections and procedures sections, for example:

- We are confused about the use of the language ‘clean closure.’ Specifically the part that provides, “In the unlikely event the soil beneath the LCS cannot meet clean closure performance standards, the Permittees will meet with Ecology to discuss closure.”²⁰ This leads one to question what the clean closure performance standards for LCS are, why there is a presumption for a clean closure of LCS given the IDF leachate contaminant uncertainty, and whether the boundary for LCS is so narrow that it does not include IDF.

Response to O-2-17

Our current plan for the LCS DWMU is clean closure. Considering that the IDF hasn't started any waste disposal operations, the subject sentence is to address the uncertainties in the future IDF operation. Appropriate and detailed closure activities must be identified based on the operational history and event. If clean closure was either not feasible or practical, then the Permittees will have to discuss with Ecology what will be the best possible alternative for the closure of the LCS DWMUs.

Apart from this proposed modification to add two LCS DWMUs into the IDF Permit, there is a separate Class 3 permit modification (often called IDF active-life modification or IDF Operating modification), which adds three DWMUs to the IDF Permit (additional disposal cell, a storage pad, and a treatment pad). Ecology held a 45-day public comment period for the IDF active-life

¹⁸ See, e.g. , Chapter 4 Process Information, page 28 and Appendix C7A Sampling and Analysis Plan for IDF Leachate, page 8.

¹⁹ Compare Chapter 4 Process Information page 8 (crossed out section 4.2 Leachate Collection Tanks, which said “procedures will be written”) with page 30-34 (added section 4.3.4 Leachate Collection Units). See, e.g. , Appendix C7A Sampling and Analysis Plan for IDF Leachate, page 16 (provides specific and clear expectations for logbooks).

²⁰ Chapter 11 Closure, page 12. Emphasis added.

modification from 9/13 to 10/28/2021, and re-opened another 45-day public comment period from 7/25 to 9/9/2022. Since the re-opened public comment period was closed on 9/9/2022, Ecology has been actively reviewing the public comments received from the public comment periods to make a final permit decision. Ecology plans to make a final permit decision in May 2023 on the Class 3 permit modification in accordance with WAC 173-303-840(8). If Ecology decides to approve and issue the final permit modification, the final permit modification would add a permit condition to require the Permittees to update the IDF Closure Plan no later than six months prior to acceptance of the last shipment of waste at the IDF. During that time to update the Closure Plan, closure performance standards will be determined based on available information at that time for the IDF operational history and event.

Comment O-2-18

- We are concerned about parts under the Process Information chapter that do not include key procedure details to enhance safety. For example, the following actions must be taken when there is a spill into the environment from (1) the LCU Liner system, then “stop the leak and contain any surface leakage, and manage as dangerous and/or mixed waste;”²¹ or (2) the ancillary equipment, then “remove and dispose of all visible releases of dangerous waste to the environment.”²² There is no further explanation or reference made to another set of procedures, yet many unanswered questions: how is the spill to be stopped and contained? How and where is the spilled waste disposed of? What protective equipment is used? At what point should workers call for additional help? What reporting is to be done?

Response to O-2-18

As described in Section 4.3, the LCS DWMUs were permitted to operate as miscellaneous units in accordance with WAC 173-303-680, Miscellaneous units.

The second paragraph in Section 4.3.11 reads, “in the event of a spill to the environment, the LCU will be taken out of service. Immediate steps will be taken to safely stop the flow of dangerous waste into the system, and an assessment performed to determine the cause. Response actions will follow the processes outlined in WAC 173-303-640(7) and 650(5).”

Ecology determined that WAC 173-303-640, Tank System, is appropriate to set required actions in the event of spill from LCU ancillary equipment. We determined that WAC 173-303-650, Surface impoundments, is appropriate to set required actions in the event of spill from LCU liner systems and sidewalls.

Addendum J.2 Active Life Contingency Plan and Attachment 4, Hanford Emergency Management Plan address required actions to be taken in the event of spill. Please note that apart from this proposed modification to add two LCS DWMUs into the IDF Permit, there is a separate Class 3 permit modification (often called IDF active-life modification or IDF Operating modification), which adds three DWMUs to the IDF Permit (additional disposal cell, a storage pad, and a treatment pad). Ecology held a 45-day public comment period for the IDF active-life

²¹ Chapter 4 Process Information, page 33. Emphasis added.

²² Chapter 4 Process Information, page 34. Emphasis added.

modification from 9/13 to 10/28/2021, and re-opened another 45-day public comment period from 7/25 to 9/9/2022. Since the re-opened public comment period was closed on 9/9/2022, Ecology has been actively reviewing the public comments received from the public comment periods to make a final permit decision. Ecology plans to make a final permit decision in May 2023 on the Class 3 permit modification in accordance with WAC 173-303-840(8). If Ecology decides to approve and issue the final permit modification, the final permit modification would replace Addendum J.1 Active Life Contingency Plan with Addendum J, Contingency Plan.

Comment O-2-19

- We are concerned about presumptions made about ‘rare storm events.’ Specifically, the part that provides “LCRS operations ensure that the fluid head on the top liner does not exceed 30.5 cm (12.0 in.) measured above the LCRS sump floor (except for a rare storm event []).”²³ Given the increase in environmental anomalies across the nation and world, it would be prudent to proactively plan.

Response to O-2-19

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

Section 4.2.6.1 in Chapter 4. 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-2-20

- The permit provides that “any liquids remaining in the LCS will be drained and [] transported via tanker truck to a RCRA-permitted disposal facility.”²⁴ What are the RCRA-permitted disposal facilities and processes being considered? As previously mentioned, we are concerned about Perma-Fix Northwest (PFNW) treating waste from Hanford Nuclear Site due to its disturbing history of accidents, violations, findings, and non-compliances. Further, we strongly support vitrification, especially in opposition to the increasing interest in finding ways to grout Hanford’s tank waste.²⁵

²³Appendix C7 Leachate Monitoring Plan, page 7.

²⁴ Chapter 11 Closure, page 11.

²⁵ See Relabeling and Grouting Tank Waste at Hanford: Frequently Asked Questions , <https://static1.squarespace.com/static/568adf4125981deb769d96b2/t/608c8d11cf966f0ac2885e2f/1619823889391/2021+04.30+FINAL+FAQ+on+reclassification+of+HLW.pdf>, 04/30/2021 and Why Grout Failed at Hanford: Chronology of the Failed Grout Program , <https://static1.squarespace.com/static/568adf4125981deb769d96b2/t/60f9b2bdb9480b7aeb6cbe15/1626976958173/2021+06.15+Why+Grout+Failed+at+Hanford.pdf>, 06/15/2021.

Response to O-2-20

A RCRA-permitted disposal facility at the time of the LCS closure activities could be LERF/ETF or an offsite RCRA-permitted disposal facility. Considering that the IDF hasn't started any waste disposal operation, we don't know which RCRA-permitted disposal facilities are to be considered.

Section 11.3 of Chapter 11, Closure Plan 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. 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-2-21

- We are concerned with the Leachate Monitoring Plan's lack of thoroughness.²⁶ The entire plan is only 2.5 pages, including introduction, charts, and references. For example, the plan provides that an LDS liner with liquid above a certain depth "will be removed at the earliest practicable time after detection," but does not indicate how often the liners are inspected or how they are otherwise monitored.²⁷

Response to O-2-21

In the second paragraph in Section C7.2.2, LDS monitoring is described as follows:

"The pump in the LDS can be operated either manually by an operator or automatically by the PICS. Level sensors within the LDS sump monitor leachate accumulation levels. When operated automatically, the level sensors will cycle the LDS pump on and off in response to rising and falling leachate levels. The LDS pump will start automatically when the leachate level reaches the established start level setpoint, and shut down automatically when the sump has drained to the established stop level setpoint."

Physical inspection of the LDS liners is not practical. Instead, the following paragraphs in Section C7.2.2 further discuss LDS monitoring:

"Leachate collected in the LDS sump is measured at least once each week (during the active life and closure period) to determine the leakage rate through the primary liner."

"The LDS flow meter will be used to check, on a weekly basis during the active life, if the amount of leachate pumped from the LDS sumps corresponds to the amount accumulated in the leachate collection units to verify proper function of the LDS."

²⁶Appendix C7 Leachate Monitoring Plan, pages 7-9.

²⁷ Appendix C7 Leachate Monitoring Plan, pages 8.

Comment O-2-22

- We suggest requiring components and specifications meeting Washington Administrative Code (WAC) requirements be provided rather than accepting the statement that “the following tank components and specifications were assessed and verified to meet the [WAC] requirements.”²⁸ Such information should be easy to provide as it has been confirmed as assessed and verified. Plus, the inclusion would increase transparency and accountability.

Response to O-2-22

For transparency and to support public review and comment on the draft permit, Ecology included the following reports as supplemental information for the public review:

- *IQRPE Design Assessment Report for the IDF Leachate Tank Domes*
- *IQRPE Installation Assessment Report for IDF Leachate Transfer Pipeline*
- *IQRPE Design Assessment Report for IDF Leachate Tank Liner Replacement*
- *IQRPE Design Assessment Report for the IDF Leachate Transfer Pipeline*

Information about LCU components and specifications to assess and verify that they meet the [WAC] requirements are included in the above reports.

Comment O-2-23

Finally, we’d like to bring your attention to the following:

- We noted that XR-5 proprietary geomembrane tank liners have been changed to Linear Low Density Polyethylene (LLDP) geomembrane tank liners²⁹ with little to no changes to other, seemingly connected parts. For example, this part was not updated so presumably is referring to XR-5 rather than LLDP “In addition, the results of previous chemical compatibility testing and studies were evaluated against leachate composition. Information gained from this evaluation was used to select a liner that will be compatible with the expected leachate.” Though this part may still be applicable to LLDP, it brings to question whether there are other parts that should be removed or updated.

Response to O-2-23

Ecology reviewed the information included in the TA request (22-ECD-002029) to support our decision to roll the liner upgrades into the IDF LCS class 3 permit modification. Included in the TA request was the IQRPE Design Assessment report for IDF Leachate Tank Liner Replacement. Other information we reviewed but not provided for the public review for this draft permit modification include:

- *Engineering Change Request form for IDF Leachate Tank liner System Upgrade (ECR-22-000444)*
- *LLDPE Data sheet*

²⁸ Chapter 4 Process Information, page 28-29. Emphasis added.

²⁹ Appendix 4A1 Phase 1 Critical Systems Design Report, page 97.

- LLDPE standard specification
- LLDPE chemical resistance table
- GCL certified properties.
- GCL construction specifications for the IDF landfill. (Note; The GCL material is currently used in the landfill liner system.)

Based on our review, we identified the following files where modifications were necessary in the IDF Permit to support the liner upgrades.

- Chapter 4, Process Information.
- Appendix 4A1, Phase 1 Critical Systems Design Report.
- Appendix 4A3, Critical Systems Design Drawings.
- Appendix 4D, Construction Specifications (C-1), RPP-18489, Rev. 1.

Ecology revised Section 6.4.4.3 in Appendix 4A1 to make the liner information applicable to the upgraded liner (LLDPE).

Comment O-2-24

- We noted a typo: twice in the acronym for "Quality Assurance Project Plan (QAPjP)."³⁰

Response to O-2-24

Acronym for "Quality Assurance Project Plan" is QAPjP as described in Appendix C7A, Sampling and Analysis Plan for IDF Leachate.

O-3: OULWA RESEARCH STUDIO

Comment O-3-1

IDF meets the criteria of Washington Administrative Code 173 303 830(4)(e)(iii)(B)(III) to prevent disruption of ongoing waste management activities. On June 29, 2022, the U.S. Department of Energy (DOE) and Central Plateau Cleanup Company LLC (herein after referred to as the Permittees) submitted letter 22-ECD-001379 as a response to technical deficiencies for a Class 3 permit modification to add the Integrated Disposal Facility (IDF) Leachate Collection System as dangerous waste management units to the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Permit Number WA7890008967, for the IDF Operating Unit Group (OUG) 11. Attachment 2 22-ECD-002029 modification number PCN-IDF-2020-04(8C.2020.Q3) modification date 09/08/2020. Clean up activities at this site were completed under ecology and all necessary information of the new liner system being provided with this request and incorporated into the Class 3 Permit Modification C3-IDF-2021-01. WAC 173-303-280 through WAC 173-303-395 and WAC 173-303-600 through WAC 173-303- 680 cover general and final status Treatment Storage and Disposal Facility (TSDF) requirements. The IDF permit modification (REG-1281, C3-IDF-2021-01) as well as the supplemental information included with this request (REG-1298) contain design

³⁰ Appendix C7A Sampling and Analysis Plan for IDF Leachate, page 13.

drawings, construction specifications, and other detailed information to address compliance with the applicable TSDF standards for the changes requested. Note 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.

We suggest including testing and monitoring for air emission hazards and contingency plans. It is concerning that the only mention of the air under Procedures to Prevent Hazards is an assumption that "based on the waste disposed in IDF, the resulting leachate is not anticipated to present an air emission hazard."⁴ Given the uncertainties regarding the waste disposed of in IDF, it is confusing how this assumption was reached. Further explanation and emission protections is warranted for closure certifications

Described in section

- A. Address IDF Waste Stream Uncertainty
- B. Clean Closure and Moisture, Seismic Conditions,

Comments:

Proposal to proceed in testing the upgraded units.

All mixed waste accepted for disposal at the IDF will be packaged in standard containers (U.S. Department of Transportation [DOT] and/or DOE), unless alternate packages are dictated by the size, shape, or form of waste (49 Code of Federal Regulations [CFR] 173) (e.g., metal boxes), and 43 self-contained bulk waste. WA 7890008967, IDF.

Recommendation:

Address the unknown variables of contaminant waste,

Development of specific threats information. (Detailed information)

Verification process for IDF-generated wastes rather than making all "IDF-generated wastes exempt from waste confirmation and receipt activities.

Before Ecology accepts these closure certifications this may include, land use cover, characteristics and special source

We noted a typo: twice in the acronym for "Quality Assurance Project Plan (QAPjP)." (Appendix C7A Sampling and Analysis Plan for IDF Leachate, page 13.)

Conclusions:

The safe and effective treatment of Hanford's high-level tank waste is essential to the protection of human health and the environment. All facilities that are a part of managing, storing, and treating Hanford's tank waste are a top concern of Hanford Challenge. We appreciate the work the State of Washington is doing to hold the Department of Energy to its commitments and can see that reflected in the permit conditions for the Integrated Disposal Facility.

Making due preparation for persons safety by establishing data to quantify the possible co contaminants and the wide dynamic range of pollutant concentration.

Thank you for the opportunity to submit comments on the Proposed Class 3 Permit Modification for the Integrated Disposal Facility Leachate Collection System. The safe and effective treatment of Hanford's high-level tank waste is essential to the protection of human health and the environment. All facilities that are a part of managing, storing, and treating Hanford's tank waste are of continued concern.

Response to O-3-1

Thank you for your comment.

Apart from this proposed modification to add two LCS DWMUs into the IDF Permit, there is a separate Class 3 permit modification (often called IDF active-life modification or IDF active-life modification), which adds three DWMUs to the IDF Permit (additional disposal cell, a storage pad, and a treatment pad). Ecology held a 45-day public comment period for the IDF active-life modification from 9/13 to 10/28/2021, and re-opened another 45-day public comment period from 7/25 to 9/9/2022.

Since the re-opened public comment period was closed on 9/9/2022, Ecology has been actively reviewing the public comments received from the public comment periods to make a final permit decision. Ecology plans to make a final permit decision in May 2023 on the Class 3 permit modification in accordance with WAC 173-303-840(8). If Ecology decides to approve and issue the final permit modification, IDF will be allowed to accept specific waste to support tank waste treatment and DFLAW.

Furthermore, if Ecology decides to approve and issue the final IDF active-life permit modification, Section C.8 in Addendum C, Process Information, would discuss the applicability of air emission standards (40 CFR 264, Subpart AA through CC standards) based on the waste going to the IDF for disposal. Specifically, 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.

The purpose of this permit modification is to add the two miscellaneous DWMUs for storage of leachate into the IDF permit. Therefore, comment specific to waste streams and IDF waste disposal operation is outside the scope for this permit modification.

IDF-generated waste streams are exempt from waste confirmation and receipt activities as the waste is generated by known processes within the perimeter of IDF. However, IDF-generated waste streams must be appropriately characterized and profiled. Waste characterization and profiling requirements for IDF-generated waste would be covered in Addendum B, Waste Analysis Plan through IDF active-life permit modification.

It is anticipated that the LCS will be clean closed as discussed in Chapter 11. Ecology agrees that closure certifications may include, land use cover, characteristics and special source for Ecology approval.

Acronym for "Quality Assurance Project Plan" is QAPjP as described in Appendix C7A, Sampling and Analysis Plan for IDF Leachate.

Thank you again for your comment. It is Ecology's mission to protect human health and the environment, and we are ensuring the IDF permit includes complete and enforceable information for safe operations.

Appendix A. Copies of All Public Notices

Public notices for this comment period:

- Focus sheet
- Classified legal notice 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

Integrated Disposal Facility public comment period

Class 3 permit modification for leachate collection system



Figure 1. Columbia River looking at the Hanford site

- Public comment period
Dec. 5, 2022 – Jan. 20, 2023
- The proposed permit modification will add two leachate collection system (LCS) dangerous waste management units (DWMUs) to store leachate collected from the IDF disposal cells.

Public comment invited

The Washington State Department of Ecology (Ecology) is proposing a change to the Hanford Facility Resource Conservation and Recovery Act Permit, Revision 8C.

This change affects the Dangerous Waste Portion for the Treatment, Storage, and Disposal of Dangerous Waste for the Integrated Disposal Facility located in Part III, Operating Unit Group 11.

The Permittees requested a Class 3 modification to the Integrated Disposal Facility (IDF) chapter of the Hanford Dangerous Waste Permit in accordance with Washington Administrative Code 173-303-830(4)(c).

The permittees are:

U.S. Department of Energy
Richland Office
P.O. Box 550
Richland, WA 99352

Central Plateau Cleanup Company LLC
P.O. Box 1464
Richland, WA 99352

Background

The Hanford Site occupies 580 square miles in southeastern Washington State. The site produced plutonium for the nation's defense program from 1943 to the late 1980s. Today, waste management and environmental cleanup are the primary missions at Hanford.

IDF is an engineered disposal site at the center of the Hanford Site. It is designed to receive immobilized low-activity waste from the Waste Treatment and Immobilization Plant and other waste from Hanford Site operations.

IDF is currently in a "pre-active life" status and is not permitted to receive any dangerous waste. The facility currently consists of one dangerous waste management unit (DWMU) (landfill disposal cell).

Apart from this proposed modification, there is a separate Class 3 permit modification, which will bring the number of DWMUs up to four, including two landfill disposal cells, a storage pad, and a treatment pad. When this separate permit modification becomes effective, it will move IDF into an active-life phase of the facility to start receiving approved waste.



Figure 2. The Integrated Disposal Facility

Overview & Changes

This proposed permit modification adds two leachate collection systems (LCS) DWMUs in the IDF Permit to store leachate collected from the IDF disposal cells.

The LCS DWMUs look and function like tank units. However, the system has as a geomembrane liner system instead of a solid bottom. They do not meet the regulatory definition of a tank per WAC 173-303-040. Additionally, the liner system does not provide structural integrity independently; therefore, the system cannot pass a structural integrity test as a tank system.

Since they do not meet necessary design requirements for a tank system, Ecology determined these LCS DWMUs should be permitted as miscellaneous units in accordance with WAC 173-303-680, *Miscellaneous Units*.

Per WAC 173-303-680(2), permit terms and provisions from both WAC 173-303-640, *Tank Systems*, and WAC 173-303-650, *Surface Impoundments*, can be applied to these miscellaneous units, as applicable.

The proposed permit modification will allow the Permittees to operate two LCS DWMUs to store leachate collected from the IDF disposal cells.

Leachate from the IDF Disposal Cells is conveyed from the leachate collection and removal system to the

LCS DWMUs. Each unit has a working capacity of 1,420,000 L (375,000 gal).

IDF plays a vital role in supporting Hanford’s Direct-Feed Low-Activity Waste program (DFLAW), which is an important part of the Hanford cleanup process.

This proposed permit 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 Specification”
- Appendix C7, “Leachate Monitoring Plan” (new)
- Appendix C7A, “Sampling and Analysis Plan for IDF Leachate” (new)
- Appendix C8, “Sub-Surface Liquids Monitoring Operations” (new)
- Appendix 11A, “Visual Sample Plan Report Documentation” (new)

Reviewing the proposed changes

Ecology invites to you to review and comment on this proposed IDF permit modification. See the last page for comment period dates and information on how to submit comments.

Copies of the application for the proposed permit, the draft permit and fact sheet, and supporting documentation will be available during the public

comment period online at Ecology’s website¹. The documents will also be available electronically at the Hanford Public Information Repositories listed on the next page.

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

Hanford’s Information Repositories

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

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

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


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

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

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

For information on other comment periods or ways to get involved, go to ecology.wa.gov/Hanford and click “Public comment periods” on the left bar or visit Hanford.gov “public involvement opportunities”.

You can also follow us on social media.

 @EcologyWAHanford

 @ecyHanford

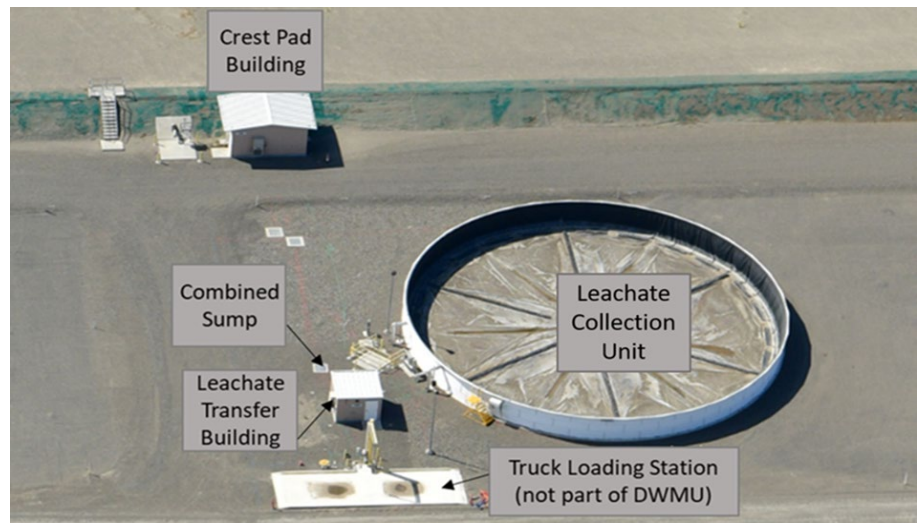


Figure 3 The Leachate Collection System

¹ Ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods



Nuclear Waste Program
 3100 Port of Benton Blvd
 Richland WA 99354

IDF Leachate Collection

Dec. 5, 2022 Jan. 20, 2023



Electronic submission (preferred):

https://nw.ecology.commentinput.com/?id_JFVp9

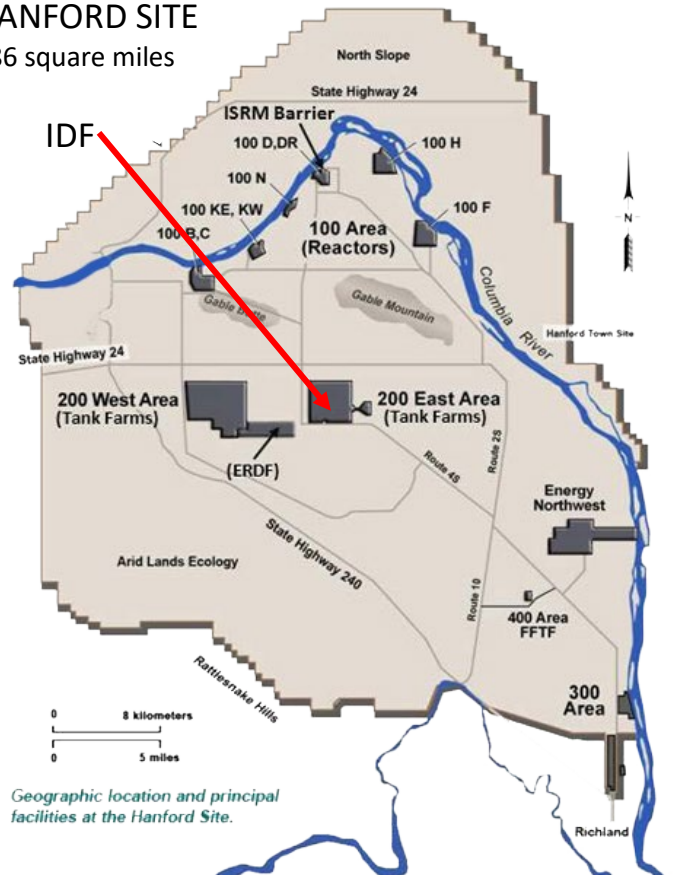
Mail or hand delivery

Daina McFadden
 3100 Port of Benton Blvd
 Richland, WA 99354

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

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

HANFORD SITE 586 square miles



To request an ADA accommodation, contact Ecology by phone at 509-372-7950 or email at Daina.McFadden@ecy.wa.gov, or visit ecology.wa.gov/Accessibility. For Relay Service or TTY call 711 or 877-833-6341.

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509.582.1500



Legals

NOTICE OF EQUALIZATION OF THE ASSESSMENT ROLL OF BADGER MOUNTAIN IRRIGATION DISTRICT

Notice is hereby given that the Assessment Roll of the Badger Mountain Irrigation District is now on file in the office of the District located at 87525 E. Reata Road, Kennewick, WA; and that the Board of Directors will meet in the office of the District at 1:00 p.m. on Wednesday December 7, 2022 as a Board of equalization for purposes of equalizing said assessments roll, at which the Board will head and determine such objections to said roll as may come before them.

Given by order of the Board of Directors

Colby Getchell District Manager
IPL0097343
Dec 4, 7 2022

CITY OF PASCO SUMMARY OF ORDINANCE NO. 4619

AN ORDINANCE OF THE CITY OF PASCO, WASHINGTON, APPROVING THE OPERATING BUDGET FOR THE 2023-2024 BIENNIAL.

Ordinance Summary:

- This Ordinance shall take effect five (5) days after approval, passage and publication as required by law.

The full text of the ordinance is available free of charge and will be mailed (electronically or via postal service) to any person who requests it from the City Clerk of the City of Pasco (509) 544-3096, P.O. Box 293, Pasco, Washington 99301-0293.
IPL0100580
Dec 4 2022

TRI CITYHERALD.COM

CITY OF WEST RICHLAND BOMBING RANGE RD / KEENE RD INTERSECTION MODIFICATIONS FEDERAL AID NO. STPUL-9903(021) BENTON COUNTY, WASHINGTON INVITATION TO BID

The City Of West Richland will receive sealed bids for the **BOMBING RANGE RD / KEENE RD INTERSECTION MODIFICATIONS** at the Public Works Building, 3100 Belmont Blvd, West Richland, Washington, 99353 until **Tuesday, December 20, 2022 at 10:00 a.m.**

This contract provides for the improvement of the intersection of Keene Road and Bombing Range Road by removal of the existing roundabout and constructing a traffic signal-controlled intersection. Work will include removal of concrete curbs, sidewalks, asphalt pavement, and storm drainage components. Construction will include excavation and embankment compaction, crushed surfacing base and top course, HMA C1.1/2-inch paving, and Traffic Signal System. Other work includes water line improvements, constructing concrete sidewalks, illumination system, storm drainage improvements, block fence, landscaping improvements, pavement markings, permanent signing and other work, all in accordance with the attached Contract Plans, these Contract Provisions, and the Standard Specifications.

All bid proposals shall be accompanied by a bid proposal deposit in cash, certified check, cashiers check, or surety bond in an amount equal to five percent (5%) of the amount of such bid proposal. Should the successful Bidder fail to enter into such contract and furnish satisfactory performance bond or quality assurance submittals within the time stated in the contract documents, the bid proposal deposit shall be forfeited to the **City of West Richland**. Each Bidder shall warrant that he has not entered into collusion with another bidder or any other person, and does not discriminate in any manner against any person based solely on race, color, sex or creed.

Full notice and completed details of the solicitation are available from www.westrichland.org/Bids.aspx. There is no charge to register, receive notifications or view and download the documents. Contact the Public Works Department of the City of West Richland by phone (509)967-5434, by email at public.works@westrichland.org if you are unable to access the documents online.

This project includes Federal Funds and is subject to the wage provisions of the Washington State Public Works Laws, Federal Davis-Bacon, and related acts.

Only properly executed proposals submitted on the forms furnished by the **City of West Richland** will be accepted. The **City of West Richland** reserves the right to reject any or all bids, to waive any informalities, to accept any bid deemed to be responsive in the best interest of the **City of West Richland** and reserves the right to readvertise for new proposals.

The **City of West Richland** is an Equal Opportunity and Affirmative Action Employer. Small, Minority- and Women-owned firms are encouraged to submit bids.

The City of West Richland, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that in any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.

Roscoe C. Slade III, Public Works Director
Name and Title

Published Date:
November 27, 2022
December 4, 2022
December 11, 2022
IPL0099088
Nov 27, Dec 4, 11 2022

Pasco School District – 4403 Suite B Improvements INVITATION TO BID

PASCO SCHOOL DISTRICT No. 1 **DESIGN WEST ARCHITECTS**
1215 W. Lewis Street 830 N. Columbia Center Blvd., Suite B
Pasco, WA 99301 Kennewick, WA 99336

You are invited to bid on a General Contract for construction in the City of Pasco for the Construction of the improvements to 4403 W Court St, Suite B, for the Pasco School District. The work will consist of site improvements, exterior building improvements, and interior improvements to the approximately 7,404 square foot space.

Preliminary Estimate:
Base Bid: \$1,500,000

Proposals will be accepted by the District until 2:00pm prevailing time on Thursday January 12, 2023, at the Pasco School District Booth Building at **1215 W. Lewis Street, Pasco, WA**. Proposals will be opened publicly and read aloud at 2:00pm. Interested parties are invited to attend.

A Pre-Bid Conference, **MANDATORY** for all General Contractor prospective bidders, will be held Wednesday December 13, 2022 at 2:00pm at the project site, 4403 Court St, Suite B, Pasco, WA.

Plans and Specifications are available, **beginning** December 5, 2022, through the Architect. Printed paper sets are available at \$50 per set (limit 2 sets to General Contractors and 1 set for subcontractors). The cost is refundable provided the documents are returned in good condition within 10 days after bid opening.

E-mailed PDF drawings and specifications are available at no cost. Contact Amanda Davis, Office Manager with Design West Architects by e-mail at adavis@designwestwa.com to request documents.

Bid security amounting to five percent (5%) of the total Base Bid must accompany each Bidder's proposal in accordance with Instructions to Bidders.

Bid documents will be available for examination during the bidding period at the following locations:

Abadan Regional Plan Center –Spokane, WA
Associated Builders & Contractors, Inc. – Spokane Valley, WA
Spokane Regional Plan Center – Spokane, WA
Tri-City Construction Council – Kennewick, WA
Walla Walla Valley Plan Center – Walla Walla, WA
Wenatchee Plan & Copy Center – Wenatchee, WA
Yakima Plan Center – Yakima, WA

No bidder may withdraw his proposal after the date and time set for opening thereof or before Award of Contract, unless said award is delayed beyond 30 days. Substantial Completion shall be achieved in compliance with Section 01 10 00 of the project specifications.

The project requires compliance with prevailing wage under RCW 39.12.

The District reserves the right to accept or reject any or all proposals, and in particular, to reject a proposal not accompanied by the required bid security or data required. The process shall comply with WAC 180-29-105, RCW 28A.335.190 and RCW 43.19.1906.

END OF INVITATION TO BID
IPL0100259
Dec 4, 11 2022

ANNUAL AGENCY PLAN PUBLIC NOTICE

Housing Authority City of Kennewick (KHA) is seeking input on the Annual Agency Plan and Capital Fund Program for plan year beginning on July 1, 2023 and ending on June 30, 2024. The public comment period will begin on December 6, 2022, and close on January 23, 2023. Two public hearings will be noticed and held after the end of the public comment period and additional comments will be accepted at that time. Copies of the plan are available on-line at www.kennewickha.org or can be picked up at the following address. Comments can be submitted via email, mail service or drop box. Address comments to: lhammer@kennewickha.org, KHA, 1915 West 4th Place, Kennewick, WA, 99336. Place "AAP Comments" in email subject line or on the drop box envelope.
IPL0100375
Dec 4 2022

CITY OF PASCO SUMMARY OF ORDINANCE NO. 4620

AN ORDINANCE OF THE CITY OF PASCO, WASHINGTON APPROVING THE CAPITAL PROJECTS BUDGET FOR THE 2023-2024 BIENNIAL.

Ordinance Summary:

- This Ordinance shall take effect five (5) days after approval, passage and publication as required by law.

The full text of the ordinance is available free of charge and will be mailed (electronically or via postal service) to any person who requests it from the City Clerk of the City of Pasco (509) 544-3096, P.O. Box 293, Pasco, Washington 99301-0293.
IPL0100581
Dec 4 2022

Tri-City Herald
TRI CITYHERALD.COM

ADVERTISEMENT FOR BID SUNNYSIDE SCHOOL DISTRICT SUNNYSIDE HIGH SCHOOL – ADDITIONAL PARKING PROJECT

The Sunnyside School District will receive sealed bids for Sunnyside High School – Additional Parking Project from qualified Contractors. Bids will be received until 11:00 a.m. on Wednesday the 21st of December 2022 at the District's administrative offices located at 1110 S. 6th Street, Sunnyside, WA 98944. Bids received after the stated time will not be accepted. The bids will be publicly opened by District staff. Official bid results shall be made public within 48 hours of bid opening. Bids will be on a lump-sum basis awarded to the lowest responsible bidder. The Owner reserves the right to reject any or all bids or to waive informalities in the bidding. No bids shall be withdrawn for a period of 30 days subsequent to opening of bids without the written consent of the Owner.

A Pre-bid walk-through for bidding Contractors will be held on Wednesday, December 14th at 1:30 p.m. at Sunnyside School District Maintenance & Facilities office located at 1831 E. Edison, Sunnyside, WA 98944. The Scope of Work is to add an additional 104 paved parking spaces along the access road near the existing baseball and softball fields. With this, there will be some revisions to the existing irrigation system and replacement of some of the existing light pole fixtures. Due to timing, the demolition and placement of gravel and as much concrete as possible will take place the first of 2023 with the paving, striping, and landscaping to occur in spring of 2023.

The Owner hereby notifies all bidders that it will affirmatively ensure that in any Contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunities to submit bids, and will not be discriminated against on the grounds of race, color, creed, religion, sex, marital status, sexual orientation, age, honorably discharged veteran or military status, national origin, or the presence of any sensory, mental, or physical disability in consideration for an award. This Project is subject to the Yakima County prevailing wage rate requirements. Contract documents may be examined at the following locations:

TriCity Construction Council
20 E. Kennewick Avenue
Kennewick, WA 99336
(509) 582-7424

Spokane Regional Plan Center
209 N. Havana Street
Spokane, WA 99202
(509) 328-9600

Yakima Plan Center
1212 N. 16th Avenue Ste 2
Yakima, WA 98902
(509) 457-4271

Seattle Daily Journal of Commerce - Plan Center
83 Columbia Street #200
Seattle, WA 98104
(206) 622-8272

Walla Walla Valley Plan Center
29 E. Sumach Street
Walla Walla, WA 99362
(509) 525-0850

Contact Meier Architecture • Engineering, Inc., 12 W. Kennewick Avenue, Kennewick, WA 99336, Project Manager, Gary Fleming at 509.737.6934 for any questions regarding the Bid Documents.

Each bid shall be accompanied by a certified check, cashier's check, bank draft, or money order payable to the School District or a bid bond with a corporate surety licensed to do business in the State of Washington, in an amount not less than five (5) percent of the amount of the bid.

IPL0100314
Dec 4, 11 2022

CITY OF RICHLAND NOTICE OF PUBLIC HEARING

The Richland City Council will conduct a public hearing on **Tuesday, December 6, 2022 at or after 6:00 p.m.** in the Council Chambers, Richland City Hall, 625 Swift Boulevard, Richland, WA 99352, to receive comments on Rules Related to City Employment: Proposed Amendment to Exhibit A of the Compensation Plan for Unaffiliated Employees – 2015 and Continuing (Resolution No. 2022-138) and Proposed Amendment to Appendix A of the 2021-2023 BEW Collective Bargaining Agreement (Resolution No. 2022-148). Comments may be mailed to the City of Richland c/o Lacey Paulsen, 625 Swift Blvd, MS-12, Richland, WA 99352, or emailed to lpaulsen@ci.richland.wa.us. All comments must be received by 4:00 p.m. on the meeting date identified above.

For information, please contact Lacey Paulsen at lpaulsen@ci.richland.wa.us or 509-942-7392.
Published: Sunday, December 4, 2022
IPL0100373
Dec 4 2022

CITY OF PASCO PUBLIC NOTICE

Si necesita ayuda para entender este aviso o necesita más información, por favor llame al Departamento de Desarrollo Comunitario y Económico de la Ciudad de Pasco a 509-545-3441.

Proposal: 427 S. Cedar LLC, c/o Edward and Elizabeth Montez, has submitted a rezoning application (Z 2022-017) from R-2 (Medium Density Residential), for land in Section 28, Township 9, Range 30, Pasco, Franklin County, WA (Parcel 113900066) located at 131 S Cedar Avenue. The proposal is subject to regulations contained in the Pasco Municipal Code.

Public Comment Period: Written comments must be submitted to the Community Development Department by 5:00 p.m. on **14 December 2022** to be included in the Hearing Examiner packet. If you have questions on the proposal, contact the Planning Division at (509) 545-3441 or via e-mail to: beank@pasco-wa.gov.

Open Record Hearing: The Hearing Examiner will conduct the open record hearing at 6:00 p.m. on **14 December 2022** in the Council Chambers in Pasco City Hall at 525 N 3rd Avenue in Pasco, Washington. The Hearing Examiner will consider public testimony concerning the above application at this meeting.

If you wish to participate in the hearing virtually, please register at least 2 hours prior to the meeting at the following registration link:
www.pasco-wa.gov/publiccomment

After registering, you will receive a confirmation email containing information about joining the webinar.

Estimated Date of the Decision: It is estimated that the Hearing Examiner will make a decision on the Special Permit within ten (10) business days of the public hearing.

Prepared 29 November 2022 by: Kelsey Bean, Planner 2, PO Box 293 Pasco, WA 99301 (509) 545-3441
IPL0100411
Dec 4 2022

KENNEWICK PLANNING COMMISSION NOTICE OF PUBLIC HEARING

The Kennewick Planning Commission will hold a Public Hearing on December 19, 2022 at 6:30 p.m. or as soon as possible thereafter, to receive public comment on a proposed amendment to the Kennewick Municipal Code. Staff will be presenting their analysis and the Planning Commission will make a recommendation to the City Council on the item.

The public hearing will be held using a virtual platform. The link to register for the hearing will be posted online at www.go2kennewick.com/planningcommission 5 days prior to the meeting.

Proposal – It is proposed that housing be permitted in the Public Facility (PF) zone when owned and/or operated by the Kennewick Housing Authority or other public agency and that the standards applicable to the Residential, High (RH) zone be applicable to said developments.

Proponent – City of Kennewick
Comment Period – Written comments may be submitted via email to Anthony.Muai@ci.kennewick.wa.us. Comments may also be mailed to 210 W. 6th Ave., Kennewick, WA 99336 and must be received on or before the hearing date. Comments may also be presented at the hearing. The City of Kennewick welcomes full participation in public meetings by all citizens. No qualified individual with a disability shall be excluded or denied the benefit of participating in such meetings. If you wish to use auxiliary aids or require assistance to comment at this public meeting, please contact Melinda Didier at (509) 585-4275 or TDD (509) 585-4425 or through the Washington Relay Service Center TTY at #711 at least ten days prior to the date of the meeting to make arrangements for special needs.

IPL0100465
Dec 4 2022

CITY OF PASCO NOTICE OF PUBLIC HEARING

Si necesita ayuda para entender este aviso o necesita más información, por favor llame al Departamento de Desarrollo Comunitario y Económico de la Ciudad de Pasco a 509-545-3441. **PLEASE TAKE NOTICE** that the Pasco Hearing Examiner will hold a public hearing at 6:00 p.m., Wednesday, 14 December 2022 to consider the establishment of zoning (**Master File# ZD 2022-003**) for the unincorporated property identified below in the event such property is annexed to the City of Pasco. RS-20 (Low-Density Residential) is being considered. **General Location: The site is generally located east of Road 68 between Deseret Drive and Kau Trail Road.**

PARCEL 115 130 046: The West 1/2 of the East 1/2 of the Northeast 1/4 of the Southeast 1/4 of Sections 4 of Township 9 North Range 29 East, WA.

PARCEL 115 130 055: The East 1/2 of the East 1/2 of the Northeast 1/4 of the Southeast 1/4 of Sections 4 of Township 9 North Range 29 East, WA.

THEREFORE, LET ALL CONCERNED TAKE NOTICE that a Public Hearing will be held by the Hearing Examiner of the City of Pasco, Washington, in the City Council Chambers, Pasco City Hall, 525 N 3rd Ave at the hour of 6:00 p.m., **Wednesday, 12**, so that all concerned may appear and present any objections or support for the establishment of zoning classifications for the proposed annexation area. If you have questions on the proposal, contact the Planning Division at (509) 545-3441 or via e-mail to: adamsj@pasco-wa.gov.

If you wish to participate virtually in the hearing, please register at least 2 hours prior to the meeting at the following registration link:
www.pasco-wa.gov/publiccomment

After registering, you will receive a confirmation email containing information about joining the webinar.

Public Comment Period: Written comments submitted to the Community Development Department by 5:00 p.m. on **Wednesday, 14 December 2022** will be included in the Hearing Examiner's meeting packet. You may also submit comments at the Hearing Examiner meeting advertised above. Prepared 19 September 2022 by: Jeffrey B. Adams, Associate Planner, PO Box 293 Pasco, WA 99301 (509) 545-3441.
IPL0100419
Dec 4 2022

IDF Leachate Collection System Class 3 Permit Modification public comment period

We are holding a 45-day public comment period addressing proposed modifications to the *Dangerous Waste Portion for the Treatment, Storage, and Disposal of Dangerous Waste* integrated Disposal Facility (IDF) located in Part III, Operating Unit Group 11. The permittees are the U.S. Department of Energy and contractor Central Plateau Cleanup Company LLC. IDF is located on the Hanford Site in southeastern Washington. The public comment period is Dec. 5, 2022, through Jan. 20, 2023.

Proposed changes
This proposed permit modification adds two leachate collection systems (LCS) dangerous waste management units (DWMUs) in the IDF Permit to store leachate collected from the IDF disposal cells.

The proposed permit modification will allow the Permittees to operate two LCS DWMU to store leachate collected from the IDF disposal cells. Leachate from the IDF Disposal Cells is conveyed from the leachate collection and removal system to the LCS DWMUs. Each unit has a working capacity of 1,420,000 L (375,000 gal). IDF plays a vital role in supporting Hanford's Direct-Feed Low-Activity Waste program (DFLAW), which is an important part of the Hanford cleanup process.

How to comment
The proposed modification is available for review online at the Nuclear Waste Program's public comment page at ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods.

Electronic copies of the proposed modification are also located at the Information repositories on the Nuclear Waste Program's public comment page or at the Administrative Record at pdw.hanford.gov. Please submit comments by **January 20, 2023**. Electronically (preferred) at <https://nw.ecology.wa.gov/comment/?id=JFVp9> or deliver to: Daina McFadden, 3100 Port of Benton Blvd, Richland WA 99354

Public hearing
A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, contact: Daina McFadden Hanford@ecy.wa.gov 509-372-7950
IPL0100432
Dec 4 2022

TRI CITYHERALD.COM

City of Richland, Washington Call for Bids ITB #22-0095 HORN RAPIDS BPS

Bids Due: December 20, 2022, AT 11:00 AM EXACTLY, Pacific Local Time

Public notice is hereby given that bids will be received for the City of Richland's **HORN RAPIDS BPS** Project by the City of Richland Purchasing Division until the date and time specified above, at which time bids will be opened and read publicly. This project includes construction of an irrigation (non-potable) booster pump station within a CMU building. Site improvements including power, piping, and an infiltration manhole are also included in this contract in order for the booster pump station to become fully operational.

The City of Richland has scheduled a non-mandatory pre-bid walkthrough on December 13, 2022 starting at 10:00 AM at the project site, located at 3407 River Valley Drive, Richland, WA 99354.

Full notice and complete details of the solicitation are available from www.PublicPurchase.com. There is no charge to register, receive notifications or view and download the documents. All bids shall be submitted electronically using the Public Purchase site. Visit the City of Richland website at www.ci.richland.wa.us under Departments/ Purchasing/ Public Purchase for information on how to register. Contact Public Purchase directly if unable to access documents online at support@publicpurchase.com. On-line Chat is available from 7:00 a.m. to 4:00 p.m. MT at www.publicpurchase.com top left corner. If unable to reach Public Purchase, contact the City Purchasing Division at 509-942-7710.

The City of Richland in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 200d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, subtitle A, Office of the Secretary, Part 21, nondiscrimination in federally assisted programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively ensure that in any contract entered into pursuant to this advertisement, disadvantaged business enterprises as defined at 49 CFR Part 26 will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, national origin, or sex in consideration for an award.
IPL0100528
Dec 4 2022

Auctions

Auctions

CASADAY TOWING ABANDONED VEHICLE AUCTION THURSDAY 12/8/22 AT 9 AM VIEWING IS 1 HOUR PRIOR 10 PLUS VEHICLES AUCTION HELD AT 1716 W LEWIS ST PASCO WA. 99301 OPEN TO PUBLIC VEHICLES CAN BE VIEWED ON CRAIGSLIST UNDER AUCTION

Animals

Dogs



AKC Fox Red Labs Ready to go 1/2- 179
\$900 3 Girls 4 boys Born 11/14 from Grand Master Hunting & Pointing lines. Parents genetic and health tested. Taking deposits now, \$250 call for details 509 942 4245

AKC French Bulldog puppies starting at \$3800
Jackie (503)481-3593

Aussiedor Puppies For Sale
Born 11/6/22. Ready on 12/19/22 with shot and deworming. 509-714-1629

Brittany Spaniel Puppies
Great Hunters and Companions, AKC Reg , Born 10/30/22. Both parents great hunters and dispositions. finchbranch58@gmail.com

Merchandise

Miscellaneous

Hanukkah Holiday Bazaar
Sun. 12/4 1-4p.m. 312 Thayer Dr., Richland. Everything for Hanukkah. Menorahs, candles, dreidels, gifts, books & crafts. Plus snacks & bake sale. Info: 509-378-2920

Tri-City Herald
jobs.tri-cityherald.com



Goldador

Golden Retriever/Red Fox Lab A beautiful, healthy female puppy available now. Her mom is purebred Golden Retriever, her dad is a handsome pure bred Red Fox Lab. She has had her starter shot, deworm, and vet check. Contact 541-968-8565 or see our website: wallawallarivertretrievers.com



Employment

Employment

AMAZON DATA SERVICES, INC., an Amazon.com company - Umatilla, OR: **Director, Tech Ops Engineering:** Stay on top of the long-term strategy as well as the operating details of the organization to ensure urgent tactical issues are closed & their teams are taking steps to head off customer impacting risks & issues. (AMZ6262852). Multiple job openings. Apply online: www.amazon.jobs - search by AMZ6262852. EOE.

Fiscal Analyst 3

The HOH GEAR UP team is seeking a **Fiscal Analyst 3** with a work location in Richland, WA. Position will support our programs in 26 schools by managing the day-to-day financial functions of the HOH GEAR UP Programs. Responsibilities include providing fiscal management of pre-and post-grant awards, managing fiscal operations, coordinating of contracts and grants, ensuring fiscal practices are in conformance with WSU regulations and policies, supervising fiscal employees, advising staff on process improvement, and management support.

This position requires a Bachelor's degree, which includes eighteen (18) quarter hours or twelve (12) semester hours in accounting, auditing, or budgeting and two (2) years of relevant professional experience or equivalent education/experience is required. Apply online by December 5, 2022 at <https://hrs.wsu.edu/jobs/>. WSU is an EO/AA educator and employer.

Walla Walla Community College is accepting applications to fill the role of **Program Assistant** position for the WWCC Correction Education program located at the Washington State Penitenti

From: [Washington Department of Ecology](#)
To: [McFadden, Daina \(ECY\)](#)
Subject: Integrated Disposal Facility Leachate Collection System 30-Day Advance Notice
Date: Friday, November 4, 2022 11:46:02 AM



IDF Leachate Collection System Permit Modification

30-Day Advance Notice

Ecology is holding a 45-day public comment period addressing proposed modifications to the *Dangerous Waste Portion for the Treatment, Storage, and Disposal of Dangerous Waste* Integrated Disposal Facility (IDF) located in Part III, Operating Unit Group 11. The comment period is expected to start in early December 2022. The permittees are the U.S. Department of Energy and contractor Central Plateau Cleanup Company LLC. IDF is located on the Hanford Site in southeastern Washington.

IDF is an engineered disposal site at the center of the Hanford Site. It is designed to receive immobilized low-activity waste from the Waste Treatment and Immobilization Plant and other waste from Hanford Site operations.

What changes are being proposed?

This proposed permit modification will add two leachate collection systems to the IDF Permit. The leachate collected from the disposal cells will be stored in the leachate collection units and transferred to a permitted treatment and disposal facility.

Public hearing

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

Daina McFadden

Permit Communication Specialist

✉ Hanford@ecy.wa.gov

☎ 509-372-7950

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From: [Washington Department of Ecology](#)
To: [McFadden, Daina \(ECY\)](#)
Subject: IDF Leachate Collection System Class 3 Permit Modification public comment period
Date: Monday, December 5, 2022 10:25:58 AM



IDF Leachate Collection System

Class 3 Permit Modification

We are holding a 45-day public comment period addressing proposed modifications to the *Dangerous Waste Portion for the Treatment, Storage, and Disposal of Dangerous Waste* Integrated Disposal Facility (IDF) located in Part III, Operating Unit Group 11. The permittees are the U.S. Department of Energy and contractor Central Plateau Cleanup Company. IDF is located on the Hanford Site in southeastern Washington.

The proposed modification is now available for public review:

Review starts: **Dec. 5, 2022**

Review ends: **Jan. 20, 2023**

Proposed changes

This proposed permit modification adds two leachate collection systems (LCS) dangerous waste management units (DWMUs) in the IDF permit to store leachate collected from the IDF disposal cells.

The proposed permit modification will authorize the permittees to operate two LCS DWMU to store leachate collected from the IDF disposal cells.

Leachate from the IDF disposal cells is conveyed from the leachate collection and removal system to the LCS DWMUs. Each unit has a working capacity of 1,420,000 liters (375,000 gallons).

IDF plays a vital role in supporting Hanford's Direct-Feed Low-Activity Waste program (DFLAW), which is an important part of the Hanford cleanup process.

How to comment

The proposed modification is available for review online at the Nuclear Waste Program's [public comment page](#).

Electronic copies of the proposed modification are also located at the [Administrative Record](#) and [Information Repositories](#).

Please submit comments by **Jan. 20, 2023**. [Electronically](#) (preferred) or deliver to:

Daina McFadden
3100 Port of Benton Blvd
Richland WA 99354

Public hearing

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

Daina McFadden
Permit Communication Specialist

✉ Hanford@ecy.wa.gov

☎ 509-372-7950

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Washington Department of Ecology · 300 Desmond Drive SE · Lacey, WA 98503

GOVDELIVERY 



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 player shows an illustration of a person sitting at a computer. To the right, there is a sign that says "OPEN" hanging from a ring, followed by the text "PUBLIC COMMENT PERIOD" in large, bold, black letters. Below the illustration is the logo for the Department of Ecology, State of Washington. At the bottom right of the video frame, it says "Tell us what you think." The video player interface includes 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



The video player thumbnail shows the same illustration and text as the full video. It includes the Department of Ecology logo and the text "Tell us what you think." A small overlay in the bottom left corner of the video frame shows "0:03" and "405 views".



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