



**Response to Comments  
Integrated Disposal Facility  
agency-initiated permit  
modification  
June 3 – July 19, 2024**

For the **Nuclear Waste Program**

Washington State Department of Ecology

Richland, Washington

September 2024, Publication 24-05-009



## Publication Information

This document is available on the Department of Ecology, [Nuclear Waste Program's Publication page](#).<sup>1</sup>

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

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### Cover photo credit

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

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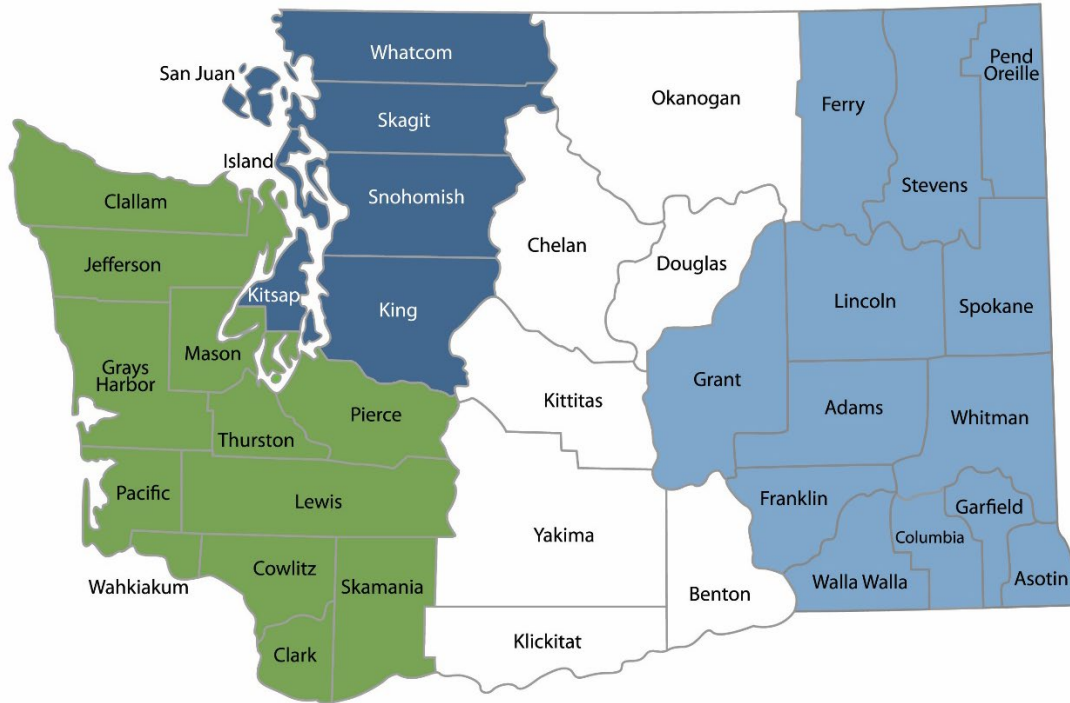
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<sup>1</sup> <https://apps.ecology.wa.gov/publications/summarypages/2405009.html>

<sup>2</sup> [www.ecology.wa.gov/contact](http://www.ecology.wa.gov/contact)

# Department of Ecology's Regional Offices

## Map of Counties Served



<b>Southwest Region</b> 360-407-6300	<b>Northwest Region</b> 206-594-0000	<b>Central Region</b> 509-575-2490	<b>Eastern Region</b> 509-329-3400
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Region	Counties Served	Mailing Address	Phone
<b>Southwest</b>	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
<b>Northwest</b>	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
<b>Central</b>	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
<b>Eastern</b>	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
<b>Headquarters</b>	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

# Response to Comments Integrated Disposal Facility Agency-initiated Permit Modification

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June 3 – July 19, 2024

Nuclear Waste Program  
Washington State Department of Ecology  
Richland, WA

September 2024 | Publication 24-05-009



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

# Table of Contents

**Introduction ..... 6**

**Reasons for Issuing the Permit..... 7**

**Public Involvement Actions ..... 7**

**List of Commenters ..... 8**

**Appendix A. Copies of All Public Notices**

## 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 Agency-initiated Permit Modification, June 3 – July 2024</i>
Permit	<i>Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Integrated Disposal Facility</i>
Permittees	U.S. Department of Energy Central Plateau Cleanup Company LLC
Original Issuance date	September 28, 1994
Effective date	September 25, 2024

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

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

## Reasons for Issuing the Permit

Ecology proposed this agency-initiated permit modification to the Hanford Sitewide 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 provides disposal for the permanent, environmentally safe disposition of vitrified Immobilized low-activity waste (ILAW) packages and other operational waste streams that meet (RCRA) requirements for land disposal.

This permit modification updates and modifies the following IDF Permit files of the final Class 3 Permit Modification 8C.2023.1F in accordance with the settlement agreement<sup>4</sup>:

- Unit-Specific Permit Conditions.
- Addendum F, Preparedness and Prevention.
- Addendum I, Inspection Plan.
- Addendum J, Contingency Plan.

The proposed changes have been made to these permit files to reflect the changes specified within the Settlement Agreement.

## Public Involvement Actions

We encouraged public comment on the draft IDF Agency-Initiated permit modification during a 45-day, public comment period held June 3 – July 19, 2024.

We took the following actions to notify the public:

- Mailed a public notice announcing the comment period to 931 members of the public.
- Placed a public announcement legal classified notice in the Tri-City Herald on June 2, 2024.
- Emailed a notice announcing the start of the comment period to the Hanford-Info email list, which has 1,722 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 Agency-Initiated Permit Modification
- Draft IDF Agency-Initiated Permit Modification

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<sup>4</sup> [https://fortress.wa.gov/ecy/ezshare/NWP/Appeals/2024-3-4IDFSettleAgree.pdf?utm\\_medium=email&utm\\_source=govdelivery](https://fortress.wa.gov/ecy/ezshare/NWP/Appeals/2024-3-4IDFSettleAgree.pdf?utm_medium=email&utm_source=govdelivery)

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 Draft IDF Agency-Initiated Permit Modification.

No comments were received during the June 3 – July 19, 2024, public comment period.



## Appendix A. Copies of All Public Notices

Public notices for this comment period:

- Focus sheet
- Classified 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

Agency-initiated Permit Modification



Figure 1. Columbia River looking at the Hanford site

- Public comment period June 3 – July 19, 2024
- Updates and modifies several Integrated Disposal Facility (IDF) Permit files.
- The proposed changes reflect changes specified within the Settlement Agreement<sup>1</sup>.

## 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 IDF.

The permittees are:

U.S. Department of Energy (USDOE)  
Richland Operations 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 located on 202 acres of land within the south-central portion of the 200 East Area 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.

The IDF is currently in a “pre-active life” status and is not permitted to receive any dangerous waste. When operational (i.e., active-life phase), the IDF will provide disposal for 19,000 metric tons of dangerous radioactive and chemical waste annually.

## Overview & Changes

This permit modification will update and modify the following IDF Permit files of the final Class 3 Permit

<sup>1</sup> <https://fortress.wa.gov/ecy/ezshare/NWP/Appeals/2024-3-4IDFSettleAgree.pdf>

Modification 8C.2023.1F, in accordance with the settlement agreement:

- Unit-Specific Permit Conditions
- Addendum F (Preparedness and Prevention)
- Addendum I (Inspection Plan)
- Addendum J (Contingency Plan)

On May 30, 2023, Ecology issued a final Class 3 Permit Modification 8C.2023.1F to the IDF Permit in the Hanford Sitewide Permit, which updated all chapters of the IDF Permit and provided detailed information to support the operation of IDF. This included the addition of three dangerous waste management units: an additional disposal cell, storage pad, and treatment pad.

On June 28, 2023, the USDOE appealed the Modification 8C.2023.1F<sup>2</sup> with the Pollution Control Hearings Board (PCHB).

On March 4, 2024, a settlement agreement that is protective of human health and the environment was reached between Ecology and USDOE. On March 13, 2024, the PCHB granted USDOE's motion<sup>3</sup> to voluntarily dismiss the case based on the settlement between the parties.

The proposed changes have been made to these permit files to reflect the changes specified within the Settlement Agreement. Please see the Settlement Agreement (footnote 1) for the specific changes made in this proposed permit modification.

When this permit modification becomes effective, it will move IDF into the active-life phase of the facility to start receiving approved waste.



Figure 2. The Integrated Disposal Facility (Photo courtesy of USDOE)

## Reviewing the proposed changes

Ecology invites 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 website<sup>4</sup>. 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.

<sup>2</sup> <https://fortress.wa.gov/ecy/ezshare/NWP/Appeals/2023-06-28Appeal-IDF.pdf>

<sup>3</sup> <https://fortress.wa.gov/ecy/ezshare/NWP/Appeals/2024-03-13OrdGrantingVoluntaryDismissal.pdf>

<sup>4</sup> <https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods>

## Hanford's Information Repositories

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

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  
**\*\*PSU Library is temporarily closed\*\***  
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](https://ecology.wa.gov/Hanford) and click "Public comment periods" on the left bar or visit [Hanford.gov](https://Hanford.gov) "public involvement opportunities".

You can also follow us on social media.



@EcologyWAHanford



@ecyHanford



Figure 3: Nuclear Waste Program office - Richland



Nuclear Waste Program  
3100 Port of Benton Blvd  
Richland WA 99354

## Integrated Disposal Facility

June 3 – July 19, 2024



Electronic submission (preferred):

<https://nw.ecology.commentinput.com/?id=jTYPJuFgd>

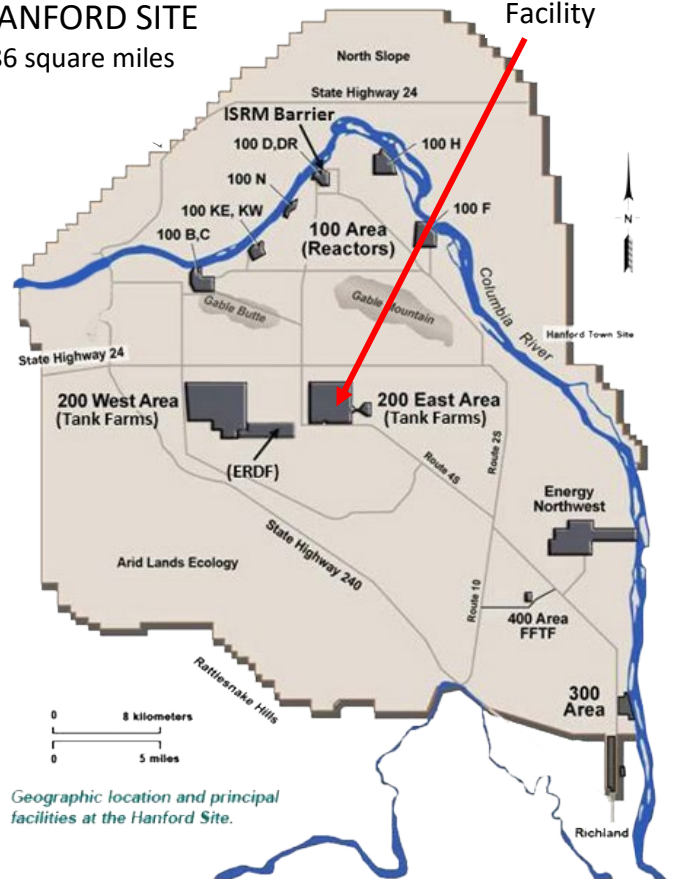
A public hearing is not scheduled, but if there is enough interest, we will consider holding one.

To request a hearing, mail or hand deliver comments, or for more information, contact:

Daina McFadden  
509 372 7950  
3100 Port of Benton Blvd  
Richland, WA 99354  
Hanford@ecy.wa.gov

## HANFORD SITE 586 square miles

Integrated Disposal Facility



Geographic location and principal facilities at the Hanford Site.

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



**From:** [Washington Department of Ecology](#)  
**To:** [McFadden, Daina \(ECY\)](#)  
**Subject:** 30-Day Advance Notice of Public Comment Period on IDF Proposed Permit Modification  
**Date:** Friday, May 3, 2024 1:03:39 PM



# Notice of Public Comment Period on Integrated Disposal Facility Proposed Permit Modification

## 30-Day Advance Notice

Ecology will be 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) Permit* starting in early June 2024. The permittees are the U.S. Department of Energy and the Central Plateau Cleanup Company LLC. IDF is a disposal site located on the Hanford Site in southeastern Washington.

## What changes are being proposed?

This Agency-initiated permit modification will update and modify specific IDF permit files of the final Class 3 Permit Modification 8C.2023.1F, in accordance with the [Settlement Agreement](#).

**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](mailto:Hanford@ecy.wa.gov)

☎ 509-372-7950

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**From:** [Washington Department of Ecology](#)  
**To:** [McFadden, Daina \(ECY\)](#)  
**Subject:** Starting today! Public comment period for the IDF Agency-Initiated permit modification  
**Date:** Monday, June 3, 2024 9:03:28 AM



## Integrated Disposal Facility Agency-Initiated permit modification

### Public comment period

**June 3 - July 19, 2024**

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 (IDF). The permittees are the U.S. Department of Energy and the Central Plateau Cleanup Company LLC.

### Proposed changes

This permit modification will update and modify the following IDF Permit files of the final Class 3 Permit Modification 8C.2023.1F, in accordance with the [Settlement Agreement](#):

- Unit-Specific Permit Conditions
- Addendum F (Preparedness and Prevention)
- Addendum I (Inspection Plan)
- Addendum J (Contingency Plan)

## How to comment

Ecology invites you to review and comment on the proposed modification. Copies of the proposed modification are 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](#).

[Review documents](#)

Please submit comments by **July 19, 2024**. [Electronically](#) (preferred) or deliver to:

Daina McFadden  
3100 Port of Benton Blvd  
Richland WA 99354

[Comment](#)

## 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](mailto:Hanford@ecy.wa.gov)

☎ 509-372-7950



**Ecology - Hanford** @ecyHanford · 52m



Starting today! The public comment period for the Integrated Disposal Facility Agency Initiated permit modification.

Check it out at [ecology.wa.gov/NWP-comment-pe...](https://ecology.wa.gov/NWP-comment-pe...) Get your comments in by July 19!



**Washington Department of Ecology - Hanford**

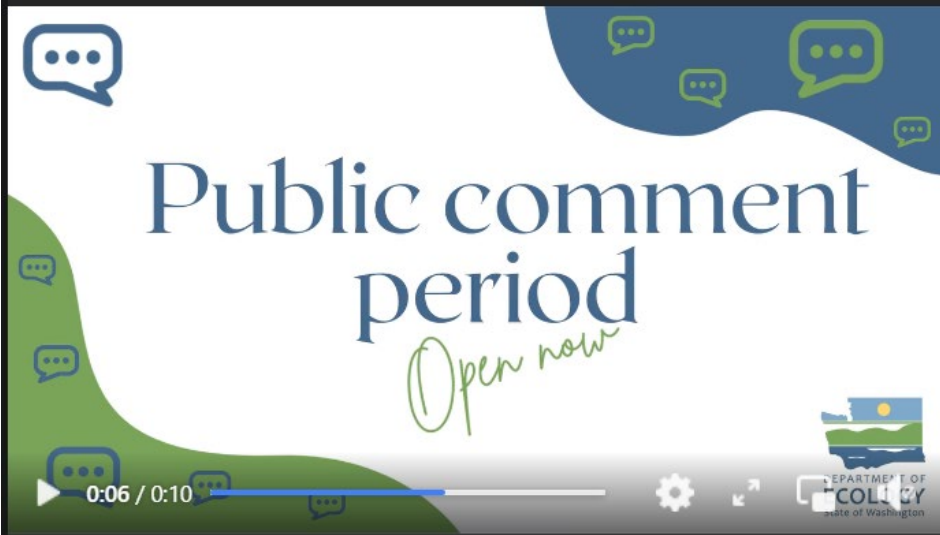


Published by Decology McFadden · 51m · 🌐

Starting today! The public comment period for the Integrated Disposal Facility Agency Initiated permit modification.

Check it out at <https://ecology.wa.gov/NWP-comment-periods>

Get your comments in by July 19!



# Integrated Disposal Facility – Agency Initiated permit modification

June 3 - July 19, 2024

We are 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 (IDF). The permittees are the U.S. Department of Energy and the Central Plateau Cleanup Company LLC.

## Proposed Changes

This permit modification will update and modify the following IDF permit files of the final Class 3 Permit Modification 8C.2023.1F, in accordance with the [Settlement Agreement](#):

- Unit-Specific Permit Conditions
- Addendum F (Preparedness and Prevention)
- Addendum I (Inspection Plan)
- Addendum J (Contingency Plan)

## How to comment

We invite you to review and comment on the proposed modification. Copies are available below or online at the [Administrative Record](#) and the Information Repositories listed on the bottom of this page.

Please submit comments by **July 19, 2024**. [Electronically](#) (preferred) or deliver to:

Daina McFadden  
3100 Port of Benton Blvd  
Richland WA 99354

## Public meeting

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](mailto:Hanford@ecy.wa.gov)  
509-372-7950

## Documents

- [Focus Sheet](#)
- [Transmittal Letter](#)
- [Fact Sheet](#)
- [Unit Specific Permit Conditions](#)
- [Addendum F: Preparedness and Prevention](#)
- [Addendum I: Inspection Plan](#)
- [Addendum J: Contingency Plan](#)