



## **Response to Comments**

# **Tank-Side Cesium Removal System Mechanical Connections**

**Oct. 7 – Dec. 12, 2024**

For the **Nuclear Waste Program**

Washington State Department of Ecology

Richland, Washington

February 2025, Publication 25-05-004



## 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 \(9\)](#).

### Author

Kotaiba Abugazleh, Permit Lead

### Cover photo credit

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## Contact Information

Daina McFadden  
Permit Communication Specialist  
Nuclear Waste Program  
3100 Port of Benton Blvd  
Richland, WA 99354  
Phone: 509-372-7950  
Email: [Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov)

**Website**<sup>2</sup>: [Washington State Department of Ecology](#)

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<sup>1</sup> <https://apps.ecology.wa.gov/publications/summarypages/2505004.html>

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# 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 Tank-Side Cesium Removal System Mechanical Connections

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Nuclear Waste Program  
Washington State Department of Ecology  
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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>Tank-Side Cesium Removal System Mechanical Connections Class 2 permit, Oct. 7 – Dec. 12, 2024</i>
Permit	<i>Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Low Activity Waste Pretreatment System</i>
Permittees	United States Department of Energy Washington River Protection Solutions, LLC
Original Issuance date	Jan 29, 2021
Effective date	March 22, 2025

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

The Low-Activity Waste Pretreatment System (LAWPS) is located in the 200 East Area of the Hanford Site. LAWPS will be operated in phases. Phase One included a Tank Side Cesium Removal (TSCR) unit that started its operation in 2022 and was initially designed to operate for about 5 years. Phase Two will either use a permanent cesium removal capability or additional TSCR units to support full operations of the Waste Treatment and Immobilization Plant (WTP) Low-Activity Waste (LAW) Facility.

The proposed Class 2 Permit Modification provides additional operational flexibility for the management of mechanical connections in the TSCR system. The modification updates the following LAWPS Permit files to allow for continued TSCR operation for minor seepages with repairs occurring during the Ion Exchange Column changeout:

- Addendum C (Process Information).
- Addendum F (Preparedness and Prevention).
- Unit Specific Permit Conditions.

The modification will support a continuous operation of TSCR as LAWPS Phase One until Phase Two is brought online with a permanent cesium removal capability to support full operations of WTP LAW Facility.

## Public Involvement Actions

The U.S. Department of Energy (Energy) encouraged public comment on the LAWPS TSCR Mechanical Connection Class 2 Permit Modification during a 60-day, public comment period held Oct. 7 – Dec. 12, 2024.

Energy notified the public by:

- Mailing a public notice announcing the comment period to 932 members of the public.
- Placing a public announcement legal advertisement in the Tri-City Herald on Oct. 6, 2024.
- Emailing a notice announcing the start of the comment period to the Hanford-Info email list, which has 1,710 recipients.

Energy held a hybrid public meeting 5:30 p.m. Oct. 30, 2024, at the Richland Public Library in Richland, Washington, and virtually on Microsoft teams. Six members of the public attended.

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

- Focus sheet
- Transmittal letter
- Fact sheet for the proposed LAWPS Permit Modification
- Draft LAWPS Permit Modification

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

- Focus sheet
- Legal advertisement in the Tri-City Herald
- Notices sent to the Hanford-Info email list
- Notices posted on the Washington Department of Ecology – Hanford’s Facebook and X pages

## List of Commenters

The table below lists the names of organizations or individuals who submitted a comment on the LAWPS Permit modification. The comments and responses are in [Attachment 1](#).

Commenter	Organization
Dan Solitz	Citizen
John Zorich	Citizen
Anonymous	Citizen
Hanford Challenge	Organization



# Attachment 1: Comments and Responses

## **Description of comments:**

Ecology accepted comments from Oct. 7 – Dec. 12, 2024. 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: DAN SOLITZ**

### **Comment I-1-1**

Would you please publish the radiological data on the leaks and seats? Thanks

### **Response to I-1-1**

*Thank you for your comment.*

*Ecology has the authority to regulate dangerous waste and the dangerous waste components of mixed (radioactive and dangerous) waste, under 70.105 Revised Code of Washington (RCW) and WAC 173-303. Ecology does not regulate waste that is solely radioactive. USDOE has the exclusive authority to regulate radioactive materials and radioactive waste.*

*Per Condition III.1.J.7, the Permittees are required to submit to Ecology a quarterly summary report including operating and monitoring data for the previous quarter. For quarters with operational issues or incidents encountered, including seepage and leaks, the quarterly report shall include, but not limited to:*

- Description of the issue or incident and how the problem was resolved.*
- Description and disposition of any generated mixed and/or dangerous waste (waste type, volume, treatment, and disposal locations, as applicable).*

*The quarterly summary report is available in Hanford Administrative Records, available online at: <https://pdw.hanford.gov/>*

## **I-2: JOHN ZORICH**

### **Comment I-2-1**

I agree with the modification to the permit. Dripping and weeping should be managed by a catch container or plastic bag or absorbent pad(s), or otherwise cleaned up by workers.

### **Response to I-2-1**

*Thank you for your comment.*

*This proposed modification is to allow TSCR operation to continue with minor seepage issue to be addressed (i.e., repairs, cleanup) during the next maintenance outage (e.g., IXC changeout). The Permittees are required to comply with the requirement of WAC 173-303-640(7) in response to spills or leaks from the TSCR tank system that are detected by the leak detection system, in accordance with Permit Condition III.1.N.2.d. Therefore, the TSCR operation must stop if a seepage from mechanical connection reach to the secondary containment (i.e., catch container).*

## **I-3: ANONYMOUS CITIZEN**

### **Comment I-3-1**

While the permit modification form is a helpful summary, it makes difficult to determine the magnitude of changes. For example, the changes summary calls out nominal flow rate revisions

based on experience for Sections C.2 and C.2.1. Doesn't say in which direction, so I had to look them up in the current version of the permit. In Section C.2, the nominal feed flow was 70 gallons per minute, but it will be 60 gallons per minute in the future. In Section C.2.1, it wasn't a flow rate that changed, it was an increase in minimum pressure (the flow rate is not described). Air pressure allowed into the filter top head was 60-80 psig, and in the future, it will be 70-80 psig. Both are for a transfer of 20 gallons of air. If the change summary could include changes in numerical values (with units) that would save some time.

### **Response to I-3-1**

*Thank you for your comment.*

*Ecology agrees with this comment and appreciate your effort in reviewing the draft permit modification. Ecology is committed to work with the Permittees to continue improving the accessibility of draft modifications for public review, including a clarity in permit modification request form.*

### **Comment I-3-2**

Section C.2.1 calls for using 0.1 M NaOH to soak and clean filters. How much additional liquid is added to the tank waste per 1,000 gallons treated? This adds to the burden of eventual effluents, for which there is no management plan, but a significant commitment for off-site treatment and off-site risk. TPA Milestone M-047-00, Completion of Work for Management of Secondary Waste from the WTP, is unresolved, in dispute, and proposed to be put off for so long it will have no value. The recent Consent Decree Quarterly Report (Letter 24-TWO-0134, November 12, 2024) notes that the DFLAW Cost Estimate at Completion (ECA) is increasing (by \$3 Million in August 2024 alone) in part due to added scope and costs for disposal of regulated effluent waste. The time to address secondary waste impacts from every planned and future action is now.

### **Response to I-3-2**

*This proposed modification is to allow TSCR operation to continue with minor seepage issue to be addressed (i.e., repairs, cleanup) during the next maintenance outage (e.g., IXC changeout).*

*Use of diluted NaOH is neither a newly proposed operational practice nor within a scope of this proposed permit modification. The proposed modification would not increase the amount of diluted NaOH needed for the TSCR operation.*

*The permittees explained that soaking and cleaning generates 50 gal of waste (0.1M NaOH + water) per 1000 gallons of waste treated for Campaign 1A.*

### **Comment I-3-3**

Recently, the Government Accountability Office issued report GAO-25-106938, DOE should use available information to measure the effectiveness of its groundwater efforts. GAO notes that Hanford Central Plateau is contaminated with carbon tetrachloride, trichloroethylene, chromium (total and hexavalent), cyanide, nitrate, iodine-129, strontium-90, technetium-99, tritium, and uranium. Contaminants are required to be cleaned to drinking water standards. However, Hanford is struggling to remove I-129, which is particularly resistant to removal.

Hanford's permitting documentation should be consciously aimed at making sure the contamination of groundwater is not expanded into the city of Richland, via shipments of liquid to Perma-Fix Northwest, just 10 feet above the water table.

The TSCR removes cesium isotopes but does not remove other radioactive species such as I-129, H-3, Tc-99, or C-14, all of which are dose hazards. The TSCR does not remove hazardous chemicals, such as ammonia and sodium hydroxide and acetonitrile, among others for which this is a listed waste.

### **Response to I-3-3**

*Ecology has the authority to regulate dangerous waste and the dangerous waste components of mixed (radioactive and dangerous) waste, under 70.105 RCW and WAC 173-303. The Hanford Site-wide Permit has requirements for the treatment, storage, and disposal of dangerous and mixed waste at Hanford. Ecology does not regulate waste that is solely radioactive. USDOE has the exclusive authority to regulate radioactive materials and radioactive waste at Hanford.*

*It is Ecology's mission to protect human health and the environment, and we are ensuring the TSCR permit includes complete and enforceable information for safe operations. This proposed modification is to allow TSCR operation to continue with minor seepage issue to be addressed (i.e., repairs, cleanup) during the next maintenance outage (e.g., IXC changeout), but not to allow any contaminants to spread to the environment.*

*Lastly, TSCR plays a vital role in supporting Hanford's Direct-Feed Low-Activity Waste (DFLAW), which is an important part of the Hanford cleanup mission. In DFLAW, TSCR accepts supernatant from the Double Shell Tank to remove undissolved solids and radioactive cesium thorough filters and IXCs prior to transferring to the Waste Treatment and Immobilization Plant's (WTP) Low Activity Waste (LAW) Facility for vitrification.*

### **Comment I-3-4**

Section C.2.2 addresses Ion Exchange but does not address disposal of loaded IX columns. The Tank Closure and Waste Management EIS calls for disposal in WTP melter. Disposal of this waste should be addressed now. A promise of a future TPA milestone is not good enough and invites creation of orphan waste.

### **Response to I-3-4**

*This proposed modification is to allow TSCR operation to continue with minor seepage issue to be addressed (i.e., repairs, cleanup) during the next maintenance outage (e.g., IXC changeout). Therefore, disposal of spent (loaded) IXCs is outside the scope for the proposed modification.*

*Addendum C (Process Information), Section C.2.2 describes the pretreatment of DST supernatant through the IX media from the IXC. Addendum C, Section C.2.6 describes storage of spent IXCs at the IXC Storage Pad. Spent IXCs will be stored in the IXC Storage Pad for the eventual disposal in a deep geologic repository. They are not allowed for onsite disposal at the Hanford site. Complete removal and disposition of the spent IXCs are required per LAWPS Permit. See Addendum H (Closure Plan), Section 2.3 and Permit Condition III.1.B.12.a.ii..*

### **Comment I-3-5**

Changes to section C.6.4, Tank Management Practices, allow spray leaks or drips to be visually monitored, with no stops to operations unless and until the sump leak detectors are activated. This is contrary to DOE's policy of maintaining employee exposures "as low as reasonably achievable." Allowing contamination to accumulate will increase doses when the mess is eventually cleaned up, and it will increase the amount of secondary waste generated during the cleaning. Further waiting while something leaks means ignoring a precursor event that could result in an eventual (preventable) catastrophic leak. Just because leaks have occurred before does not mean that ignoring them in the future is a good idea as a response. Rather, a root cause analysis is warranted for leak events. TSCR summary reports show design changes and repairs have occurred due to leaks- such as redesign of a vent hose, waste seepage, leaks at a threaded connection. Five of the 11 available quarterly reports for this system contain information about leakage. This looks like a systemic poor-quality design. There are many sources of hazards, raw tank waste, treated tank waste, reagents, and filter contents. The filter collects transuranic isotopes and strontium-90, which are significant health concerns. DOE should fix the problem and use the nuclear QA system, not stand by complacently.

### **Response to I-3-5**

*This proposed modification is to allow TSCR operation to continue with minor seepage issue to be addressed (i.e., repairs, cleanup) during the next maintenance outage (e.g., IXC changeout). As explained in the Permittees' fact sheet, "any minor weeps/seeps at mechanical connections that are observed by remote cameras but are insufficient in volume to activate the leak detection system would be addressed during the next maintenance outage. Daily visual inspections ensure weeps/seeps do not worsen and pose a threat to workers or the environment".*

*Visual inspection will be conducted through remote camera, per Table I-1 in Addendum I, Inspection Plan.*

*The Permittees are required to comply with the requirement of WAC 173-303-640(7) in response to spills or leaks from the TSCR tank system that are detected by the leak detection system, in accordance with Permit Condition III.1.N.2.d. Therefore, the TSCR operation must stop if a seepage from mechanical connection reach to the secondary containment.*

*Per Condition III.1.J.7, the Permittees are required to submit to Ecology a quarterly summary report including operating and monitoring data for the previous quarter. For quarters with operational issues or incidents encountered, including seepage and leaks, the quarterly report shall include, but not limited to:*

- Description of the issue or incident and how the problem was resolved.*
- Description and disposition of any generated mixed and/or dangerous waste (waste type, volume, treatment, and disposal locations, as applicable).*

*Ecology sees this permit modification would support a successful and continuous operation of TSCR as LAWPS Phase one until Phase two takes a place with a permanent cesium removal capability (i.e., AMPS) to support full operations of WTP LAW facility. We expect that LAWPS Phase two design and operation will overcome mechanical connection issues.*

### **Comment I-3-6**

Permit condition III.1.N.2.K.iv states: If the release was a spill that has not damage the integrity of the tank system, the permittees may return the tank system to service pursuant to WAC 173-303-640(7)(e)(ii). In such a case, the Permittees will take action to remedy the problem(s) that caused liquid to enter the secondary containment systems [WAC 173-303-320].

But WAC 173-303-320(3) also states that the "owner or operator must remedy any problems revealed by the inspection, on a schedule which prevents hazards to the public health and environment. Where a hazard is **imminent** or has already occurred, remedial action must be taken immediately." An observed spray or drip or seepage is an indication that a hazard, as minimum, is imminent, and operations should implement a stop-work. The word "**immediately**" should be added to the permit condition.

### **Response to I-3-6**

*Ecology acknowledges that any hazards must be mitigated or eliminated in accordance with applicable dangerous waste regulations. Ecology does disagree that any observed spray or drip or seepage is an indication that a hazard is imminent; appropriate and applicable action must be taken to ensure that an imminent occurrence of a hazard is avoided.*

### **Comment I-3-7**

Thank you for the opportunity to comment. The proposed permit change places production ahead of safety, raising questions about DOE's nuclear safety and quality culture. This is a repeat issue, going back to at least 2006, per GAO-06-602T, and GAO-25-106207, which calls for better quality assurance oversight, and GAO-25-106207, which notes weaknesses in DOE's use of lessons-learned reviews.

### **Response to I-3-7**

*Thank you for your comment. Ecology believes that the safety of human health and the environment is paramount. Ecology intends to monitor TSCR activities and is holding DOE accountable for maintaining safety of all concerned while in production. Ecology also expects DOE to maintain TSCR systems in good working order to mitigate or eliminate the potential for the occurrence of hazards.*

*The Permittees provided the following clarification to this comment:*

*"The modification addresses weeps/seeps of liquid at a connection point. Large quantities of liquid will still drive a shutdown and repair prior to continuing production. As the weep/seep is small quantity, contained within a locked building that does not allow personnel access while operating, each batch take approximately a month to process, there is no additional safety concern to continue running until the end of the batch vs shutting down, fixing the issue, and starting back up to complete the batch."*

## **O-1: HANFORD CHALLENGE**

### **Comment O-1-1**

**Improve the Public Process-** We appreciate receiving a redlined version of the permit after asking for it at the public meeting on October 30, 2024. However, the redlined version of the permit should have been included when the comment period opened on October 7, 2024. Without the redlined version, we were unable to easily see what the proposed changes were and therefore could not fully prepare for the public meeting. For future comment periods on permit modifications, please include the redlined version of permit when the comment period opens.

### ***Response to O-1-1***

*Thank you for your comment. Ecology agrees with this comment and appreciate your effort in reviewing the draft permit modification and preparing for the public meeting. Ecology is committed to work with the Permittees to continue improving the accessibility of draft modifications for public review, including the availability of redline documents.*

### **Comment O-1-2**

**Increase Transparency-** Increase the level of detail provided in public involvement materials. The four-page fact sheet for this comment period contained only two sentences describing the proposed changes to the permit

"Any minor weeps/seeps at mechanical connections that are observed by remote cameras but are insufficient in volume to activate the leak detection system would be addressed during the next maintenance outage. Daily visual inspections ensure weeps/seeps do not worsen and pose a threat to workers or the environment."

For future fact sheets, please include more details about the proposed changes. For example, how often do maintenance outages occur? What volume of leaked waste is enough to activate the leak detection system? How many weeps and seeps has TSCR had since the start of operations in January 2022? How long will TSCR be in operation? Where are the weeps and seeps occurring in the system and are they happening before the waste is treated, after or both? The fact sheet fails to share important details with the public that can help them understand the proposed changes and make informed comments. Without this information, the comment period is not meaningful.

In addition, increase transparency during public meetings. For example, during the public meeting for this comment period we had to ask the question: "How often do maintenance outages occur?" multiple times before we received a direct answer. In the future, provide direct answers to direct questions instead of obfuscating the answer with unnecessary details.

### ***Response to O-1-2***

*Ecology agrees with this comment that fact sheet should provide adequate information to help the members of public to understand and review the proposed permit modification. Ecology is committed to work with the Permittees to continue improving the accessibility of draft*

*modifications for public review. We appreciate your comments as well as questions during the public meeting for both future improvement and for Ecology to make the final permit decision.*

### **Comment O-1-3**

**Stop TSCR Operations When Weeps and Seeps are Discovered-** Section C.6.4 Tank Management Practices proposes changing the course of action when a weep or seep is discovered by continuing with operations, monitoring the leak, and addressing it during the next maintenance outage. The only reason to stop operations would be if the volume of the leak is sufficient to activate the leak detection system. This is unacceptable. Leaks are nothing new to the TSCR system—documented leaks occurred in October 2022, December 2022, March 2023, July 2023, and December 2023. When these leaks occurred, operations were stopped to fix the issue which allowed for design changes and repairs. For example, threaded connections were eliminated in the TSCR system where possible and a vent hose was completely redesigned. Past leaks flagged an issue in the system and provided the opportunity to make changes as soon as the leak was noticed. If a leak is allowed to continue unremedied for upwards of 30 days (which is how often maintenance outages occur), the site could be faced with a much more significant leak that could have been avoided if it was fixed as soon as the leak was detected. A root cause analysis should be conducted for all newly discovered leaks.

Hanford Challenge strongly prefers that TSCR operations stop when a weep or seep is first identified to allow for the immediate remedy of the leak. However, if the permit modification proposed changes are adopted, we encourage the addition of language regarding what to do when the leak visually changes. During the public meeting on October 30, 2024, it was verbally shared that if a visual change was noted in the weep or seep then the contractor would shut down operations and go in to fix the leak. The permit modification does not include language to this effect. Please add to the permit Section C.6.4 Tank Management Practices that if a visual change is noted in the weep or seep that operations will stop to fix the leak.

### **Response to O-1-3**

*This proposed modification is to allow TSCR operation to continue with minor seepage issue to be addressed (i.e., repairs, cleanup) during the next maintenance outage (e.g., IXC changeout). The Permittees are required to comply with the requirement of WAC 173-303-640(7) in response to spills or leaks from the TSCR tank system that are detected by the leak detection system, in accordance with Permit Condition III.1.N.2.d. Therefore, the TSCR operation must stop if a seepage from mechanical connection reach to the secondary containment.*

*Ecology agrees that a root cause analyses should be conducted for all newly discovered leaks, as appropriate.*

*Per Condition III.1.J.7, the Permittees are required to submit to Ecology a quarterly summary report including operating and monitoring data for the previous quarter. For quarters with operational issues or incidents encountered, including seepage and leaks, the quarterly report shall include, but not limited to:*



- *Description of the issue or incident and how the problem was resolved.*
- *Description and disposition of any generated mixed and/or dangerous waste (waste type, volume, treatment, and disposal locations, as applicable).*

*The quarterly summary report is available in Hanford Administrative Records, available online at: <https://pdw.hanford.gov/>*

*Lastly, we heard a suggestion through this comment for adding a clarification to Addendum C, Section C.6.4 that in the case of a visual change in the seepages observed through remote cameras, TSCR operations will stop to fix the leak. While "visual changes" could be interpreted differently, Ecology believes that existing proposed language to allow TSCR operation with "aqueous waste...that are insufficiently in volume or rate to activate leak detection alarm..." combined with the required information through quarterly summary report per Condition III.1.J.7 is sufficient that the Permittees should investigate and remedy any seepages rather proactively.*

#### **Comment O-1-4**

**Get Third Party Review and Input on this Permit Modification-** The Defense Nuclear Facilities Safety Board (DNFSB) has been integral in tracking recurring issues with the TSCR system. Include them and others in reviewing the changes proposed in this permit modification to ensure the safest policy for workers.

#### **Response to O-1-4**

*This proposed permit modification is available to all member of public. Ecology would collect any comments from the suggested organization while we cannot require or ask specific parties to review and provide comments.*

#### **Comment O-1-5**

**Protect Workers from Unnecessary Exposures-** Continuing with TSCR operations when a leak is found instead of shutting down the system and immediately fixing the leak is dangerous to workers. Allowing weeps and seeps to build up on the mechanical connections means that when workers do enter the facility they will be exposed to an increased dose. USDOE's As Low As Reasonably Achievable (ALARA) policy for protecting workers from unnecessary exposures is not honored by these proposed permit modifications. Protect workers from unnecessary exposures and dose by stopping TSCR operations when weeps and seeps are discovered.

#### **Response to O-1-5**

*This proposed modification is to allow the TSCR operation to continue with minor seepage issue to be addressed (i.e., repairs, cleanup) during the next maintenance outage (e.g., IXC changeout). If the seepage becomes a leak to the secondary containment, the Permittees are required to stop the operation and comply with the requirement of WAC 173-303-640(7) in response to spills or leaks from the TSCR tank system that are detected by the leak detection system, in accordance with Permit Condition III.1.N.2.d.*

*Ecology thinks this proposed modification could protect the worker by not requiring them to enter the TSCR enclosure every time a minor seepage is observed at the mechanical connection.*

## **Comment O-1-6**

**Ensure Better Oversight and Improve Hanford's Safety Culture-** The DNFSB wrote a letter to USDOE on October 6, 2022 about concerns with the TSCR threaded connections. The letter outlines multiple concerns including Washington River Protection Solutions' failure to adhere to the safety requirements of the American Society of Mechanical Engineers' nuclear quality assurance (NQA)-1 standard, Quality Assurance Requirements for Nuclear Facility Applications; failure to conduct a rigorous cause analysis to determine the cause of the damage discovered on the threaded connections; failure to consider how the damage may have affected the strength and durability of the connection, therefore possibly compromising the structural integrity safety function; and relying solely on "skill of craft" to ensure connections have adequate thread engagement to prevent separation in the event of a postulated flammable gas explosion, increasing the potential for a serious accident and harm to workers. While it does not specifically reference leaks, the letter highlighted weaknesses in the TSCR system regarding the threaded connections and the contractor's disregard for nuclear safety and quality assurance.

In addition, some of the subsequent leaks in the TSCR system were found at the threaded connections, providing further evidence that complete disregard for nuclear safety and quality assurance can lead to more problems down the road. This is a systemic issue at Hanford. Hanford Challenge urges USDOE to ensure better oversight of nuclear safety and quality assurance. USDOE should also make efforts to renew its commitment to improving the safety culture at Hanford.

## **Response to O-1-6**

*This permit modification will allow the continued use, under watch, of the TSCR systems during batch processing. The instances of seepage have been few and minor, and have not resulted in situations where the waste has not been appropriately managed. The mechanical connections will be corrected/updated during IX column outages at the conclusion of a batch process. That invokes the ALARA principle, ensuring that personnel are protected to the greatest extent possible.*

*The Permittees provided the following clarification to this comment:*

*"Mechanical connections that are disconnected and reconnected during maintenance evolutions are leak tested three different times prior to experiencing a production run with tank waste. Tank waste is caustic, and caustic has a way of working its way through threaded fittings and crystalizing when exposed to air. These types of leaks create weeps/seeps out of fittings that passed leak tests and have quality assurance oversight when performing the reconnections.*

*The comment as applicable to the DNFSB letter and threaded connections that have been found to leak are two different types of threaded connections. DNFSB letter was addressing a ChemJoint fitting that had the threads marred and fixed in an NQA-1 fabrication shop. The threaded fittings that leaked were NPT threads on piping. A high integrity fitting, such as the ChemJoint, has to date never been found to leak on the Hanford Site."*

### **Comment O-1-7**

Section C.2.2 Ion Exchange- The permit states,

"IXC change-out will require approximately ten days of downtime; of which, up to four days will be used for drying the spent IXC. However, should an increase in operational efficiency be required to meet processing goals, drying can be completed in one day reducing the downtime associated with column change-out."

How can the ion-exchange column (IXC) be dried in one day if needed, when the normal drying time is four days? Will the contractor increase the amount of drying air going through the columns? If the IXCs are not properly dried under rushed circumstances, is it fair to assume that the columns will not capture as much cesium? How will this shorter drying time impact worker health and safety?

### **Response to O-1-7**

*Thank you for your comment; however, the subject of drying time for ion-exchange columns is out of scope for this modification. However, the Permittees provided the following explanation as a response to this comment:*

*"IXCs at the end of their processing life in TSCR undergo a 36-hour drying duration within air temperature, flow, and dew point parameters. Testing at PNNL showed that within the parameters TSCR normally dries an IXC, an IXC can be considered dry within 24 hours and the additional drying time by TSCR is conservative. Operations dries two IXCs for removal to the storage pad. The IXCs are dried in series (one at a time) each experiencing the 36-hour drying timeframe which can take up to four days if issues arise. The "drying in a day" refers to each IXC separately. There would still be at least two days required so each IXC achieves a minimum of 24 hours of drying time.*

*Once the IXCs are dried, they are not put back into service and they have captured as much cesium as achievable during that batch. A 24-hour drying time has no impact to worker health and safety vs a 36-hour drying time, as both periods are sufficient to ensure the IXC was dry prior to placing it on the storage pad. The procedure for drying IXCs is an approved process and is outside the scope of this modification."*

## Appendix A. Copies of All Public Notices

Public notices for this comment period:

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



**Comment Period**  
Oct. 7 – Dec. 12, 2024

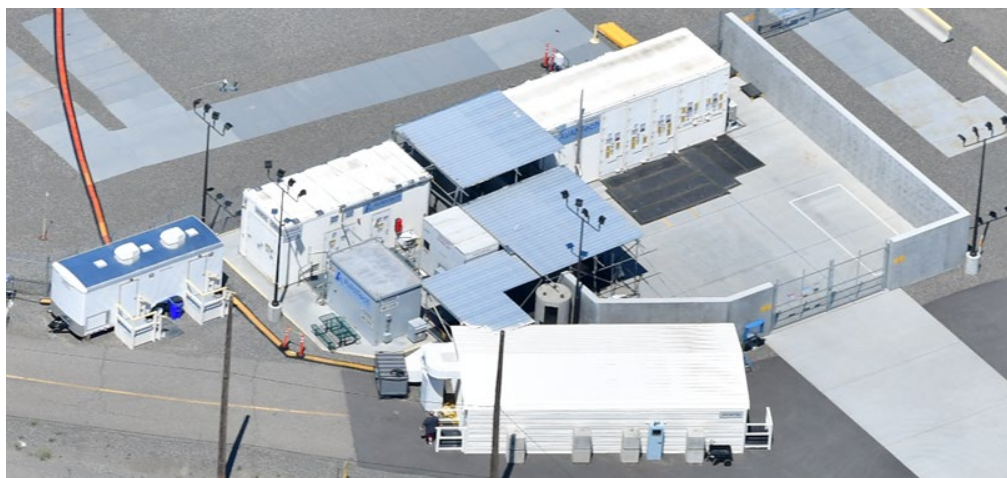
**Public Meeting**  
**Oct. 30, 5:30 p.m. PT**  
Richland Public Library  
(see page 3 for details)

**Send comments by**  
**Dec. 12 to**  
<https://bit.ly/46JvC3Q>

**Administrative Record:**  
<https://bit.ly/4dGfbaR>

**Contact Information**  
Jennifer Colborn, DOE  
(509) 376-5840  
[Jennifer.Colborn@rl.doe.gov](mailto:Jennifer.Colborn@rl.doe.gov)

Daina McFadden, Washington  
State Department of Ecology  
(509) 372-7950  
[Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov)



An aerial of Hanford's Tank Side Cesium Removal System in the 200 East Area.

*The U.S. Department of Energy (DOE) and contractor Washington River Protection Solutions (WRPS) are holding a 60-day public comment period on a proposed modification to the Hanford Dangerous Waste Permit. The Tank-Side Cesium Removal (TSCR) System pretreats tank waste for subsequent vitrification (immobilization in glass) at the Waste Treatment and Immobilization Plant (WTP) Low-Activity Waste Facility. This proposed permit modification would provide additional operational flexibility inside the TSCR System. Any minor weeps/seeps at mechanical connections that are observed by remote cameras but are insufficient in volume to activate the leak detection system would be addressed during the next maintenance outage. Daily visual inspections ensure weeps/seeps do not worsen and pose a threat to workers or the environment.*

### Background

The 580-square-mile Hanford Site in southeastern Washington state was created in 1943 as part of the Manhattan Project to produce plutonium for the nation's defense program. Today waste management and environmental cleanup are the main missions at Hanford, focusing on treating tank waste through the Direct-Feed Low-Activity Waste Program and cleanup on the [Central Plateau](#), while also conducting Site operations that enhance the safety of our workforce and the public.

The DOE and contractor WRPS are requesting a Class 2 modification to the Low-Activity Waste Pretreatment System (LAWPS) Operating Unit Group of the Hanford Dangerous Waste Permit, which includes the TSCR System.

Waste is transferred to the TSCR System from AP Tank Farm through hose-in-hose transfer lines. TSCR filters undissolved solids and separates cesium from the waste, removing most of the radioactivity in the waste stream. The System sends a pretreated stream back to AP Tank Farm before it is eventually sent to Hanford's WTP Low Activity Waste Facility for vitrification.



### Overview

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

### Summary of Changes

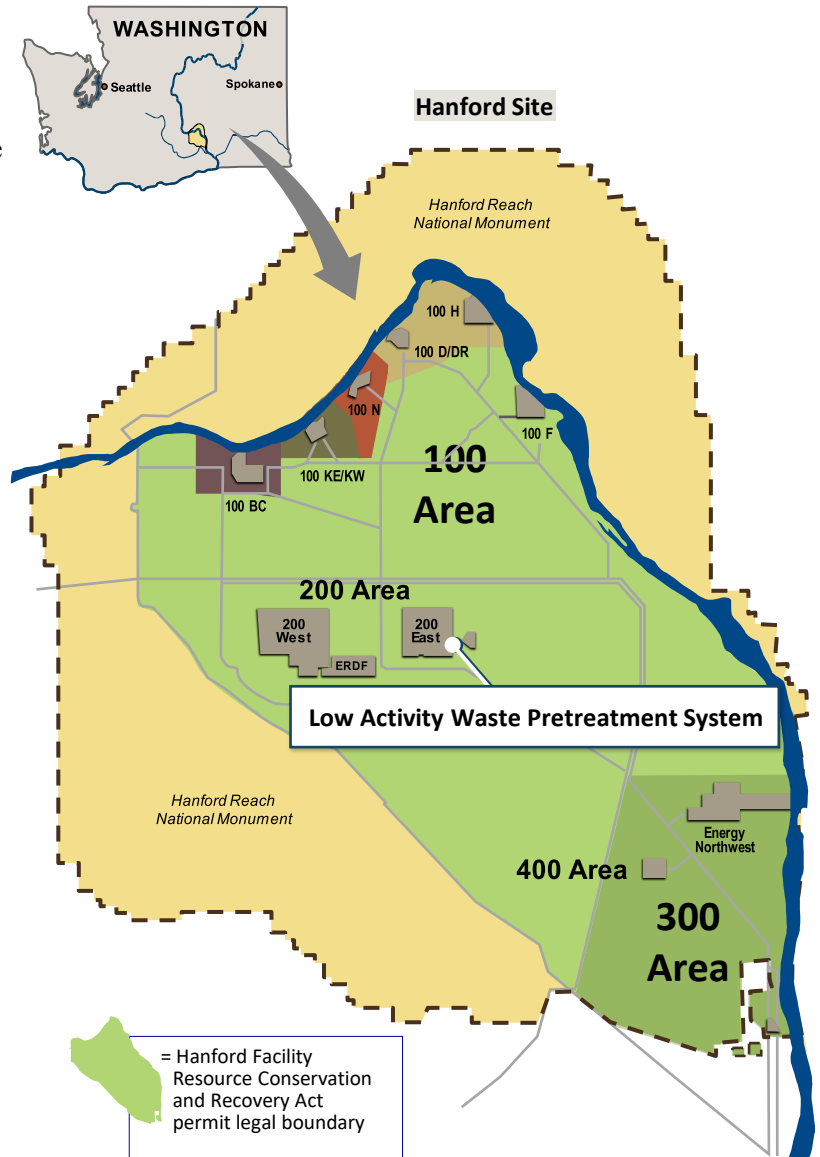
If approved, the modification will provide for operational flexibility in the TSCR System. This will support more reliable operation of TSCR and pretreatment of tank waste until the follow-on LAWPS capability can be brought online.

### Permit Chapters Affected by this Modification

- Unit-Specific Permit Conditions
- Addendum C, “Process Information”



Workers remove a spent ion exchange column from the Tank Side Cesium Removal System enclosure.



## Public Involvement

A **60-day public comment period will run Oct. 7 through Dec. 12, 2024**. A hybrid public meeting will be held Oct. 30 at 5:30 p.m. PT and will include a presentation introducing the permit modification for the management of mechanical connections in the TSCR System. To participate via Microsoft Teams, please follow the instructions below:

**Join on your computer or Teams mobile app**

[Click here to join the meeting](#)

<https://bit.ly/3X3M6kd>

**Or call in (audio only)**

[\(833\) 633-0875](tel:(833)633-0875) United States (Toll-free)

Phone Conference ID: 174 277 630#

All comments must be submitted by **Dec. 12**, in writing, by mail or electronically to:

Washington State Department of Ecology

3100 Port of Benton Boulevard

Richland, WA 99354

<https://bit.ly/46JvC3Q> (preferred)

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

Copies of the proposed plan and supporting documentation will be available online during the public comment period in the Administrative Record at <https://bit.ly/4dGfbaR>. Hanford Public Information Repository locations are listed at <https://pdw.hanford.gov/page/PIRs>.

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

*Please contact Jennifer Colborn at [Jennifer.colborn@rl.doe.gov](mailto:Jennifer.colborn@rl.doe.gov) or (509) 376-5840 at least 10 working days prior to the event to request disability accommodation. DOE makes every effort to honor disability accommodation requests.*



Jennifer Colborn  
U.S. Department of Energy  
P.O. Box 450, H5-20  
Richland, WA 99352

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

## Public Involvement Opportunity

We want to hear from you.

### Comment Period:

Oct. 7 – Dec. 12, 2024

Public Meeting: Oct. 30, 5:30 p.m. PT (see page 3 for details)





# Rattlesnake Mountain access still closed to public

BY ANNETTE CARY  
acary@tricityherald.com

RICHLAND, WA

Rattlesnake Mountain remains closed to the public a decade after Congress ordered at least limited public access to the tallest mountain in the Tri-Cities area.

Most of the almost 3,600-foot mountain near Richland, Wash., was taken over as part of the security perimeter around the Hanford nuclear site in 1943 and later became part of the Hanford Reach National Monument.

But it remains closed to the public, with the exception of some spring wildflower tours for limited participants more than nine years ago. The tours in hired minibuses were closely supervised by U.S. Fish and Wildlife Service officials.

Now the federal government is working toward having a summit with tribes on giving them co-stewardship of the mountain as the federal government moves toward required public access, said Candice Robertson, the new Department of Energy senior adviser for environmental management, during a recent Hanford visit.

"Obviously the tribes have a high priority on making sure sacred sites remain sacred," she said.

DOE needs to also continue to talk to the community about its interest in access and how, when and how often that would happen, as well as the tribes, Robertson said.

## TRIBAL USE, STEWARDSHIP

The tribal summit would advance a federal government proposal announced

in December 2023 to give Northwest tribes co-stewardship authority for the use and protection of Rattlesnake Mountain

DOE and the Department of Interior signed a memorandum of understanding on Nov. 30 and Dec. 1 that called for an interagency team to be formed for discussions with leaders of the Wanapum Band and the Yakama, Nez Perce and Umatilla Tribes.

The Department of Energy is the landowner and the monument land is managed by the U.S. Fish and Wildlife Service of the Department of Interior.

The objective is to treat Lalilik, the Native American name of Rattlesnake Mountain, as a sacred site and to support tribal connections to the mountain "that are essential to their spiritual interconnectedness, traditional gathering practices, and other ceremonial and cultural needs," according to the memorandum of understanding.

Discussions would include the potential for additional protective measures, improved access for tribal members and opportunities for tribes to take a more active role in stewardship of the mountain, DOE said in late 2023. It would also allow traditional ecological knowledge of indigenous communities to be incorporated into management plans.

Native Americans historically used the mountain, and there has been a step toward improved tribal access since the memorandum of understanding was signed.

In December, the Yakama held its first ceremonial elk hunt on the federally owned land on the moun-



BOB BRAWDY bbrawdy@tricityherald.com

Rattlesnake Mountain, seen from the Tri-Cities, is closed to public access.

tain since World War II.

Both settlers and Native Americans were forced from what is now the Hanford nuclear reservation, including its security perimeter, after the Eastern Washington land was picked to produce plutonium for the nation's nuclear weapons program during WWII.

The Yakama Nation and other Northwest tribes have treaty rights that provide access to the mountain, including for religious activities, hunting and gathering.

## RATTLESNAKE PUBLIC ACCESS LAW

One of the last acts of U.S. Rep. Doc Hastings, R-Wash., in 2014 before retiring was to pass legislation that required public access to the top of Rattlesnake Mountain.

Some limited, small guided tours would satisfy the requirement.

His successor, Rep. Dan Newhouse, R-Wash., has continued to press for the law to be upheld. In 2020 he organized a private tour to the top of the mountain for a group of 21 officials. With U.S. Fish and Wildlife, he showed off the view to community leaders and elected officials, including Hastings, and representatives of the Congressional Western Caucus.

"This must not be a right reserved only for elected officials," he said. "Public lands must be made public."

In 2015, the Yakamas

and Umatillas won a federal ruling that the Fish and Wildlife Service must consult with tribes before conducting tours on the mountain, and no tours have been held since then.

An environmental study was done, including the release of a draft and public comments in late 2018. But then work appeared to halt, rather than a decision being made on what access will be allowed.

The preferred alternative identified in the draft study was to allow guided tours, such as on small buses, to the top of Rattlesnake Mountain for up to 20 days annually.

On two days a year hikers and bikers would be allowed to climb the mountain, sticking to a steep, narrow road to the summit that is now blocked by a locked grade.

They could expect a round trip to the summit and down of about 17 miles, with an elevation gain of about 3,000 feet and a grade as steep as 18% at one point.

The Fish and Wildlife Service estimated that two guided bus or van tours a day for up to 20 days a year would allow as many as 1,200 people to take tours themed to topics such as wildflowers, birds, elk and geology on the portion of the Hanford Reach National Monument.

Annette Cary:  
509-416-6136,  
@HanfordNews

# Registered sex offender accused of repeatedly trying to set fire to Pasco home

BY CAMERON PROBERT  
cprobert@tricityherald.com

PASCO, WA

A registered sex offender is accused of setting a series of fires next to the same Pasco home over the course of a weekend.

It's not clear why Victor Isabel Dubon, 33, allegedly sought out the 19th Avenue property between Sept. 20 and 23. But investigators say his SUV was caught on camera leaving the area after all three fires., according to court documents.

Dubon, who is homeless, has been charged with second-degree arson in Franklin County Superior Court. He is being held in the Franklin County jail in lieu of \$50,000 bail.

The fires started about 11:15 p.m. Sept. 20, when firefighters were called to put out a burning pile of trash next to a detached garage on the east side of an alley, according to court documents.

Officers also found a burning post next to Richardson Park about 3 to 5 feet away from where the other fire was set.

A security video from a nearby home showed a man walking into the alley where the fires started. About six minutes later, the same man runs out of the alley. A flickering light can be seen coming from the alley he left.

A few minutes later, an SUV can be seen leaving from the direction from which the man ran.

The next fire happened two days later about 8:22 p.m. on Sept. 22 when a person living at the same home spotted a flashing light coming from near the

alley. When he walked out, he found a small "Buzzball" container with burning material inside.

Security video showed the same SUV leaving the area about the time that the fire started.

Finally, around 10:30 a.m. on Sept. 23, the trash bin of the home was set on fire. Another video was discovered showing a light-colored SUV leaving an alley near where the fire happened.

In the daylight, investigators were able to identify it as a silver Honda CRV that was registered to a Riverhill Drive home about three miles away from where the fires were being set.

Investigators learned that Dubon was the one who drove it and that he had recently become homeless.

Investigators also could recognize his SUV after his regular check-ins with the Franklin County Sheriff's Office because he is a registered sex offender. He has a 2019 conviction for third-degree child molestation and a 2012 conviction for second-degree rape.

When investigators spoke with him, he admitted to being in the area of the fires, but denied starting them.

He claimed he was looking for his cousin so he could ask for money and later said that he was looking for a cat.

Cameron Probert:  
509-416-6478,  
@cameroncprobert



ANNIE FLANAGAN NYT

International Longshoremen's Association dockworkers strike outside the Port of New Orleans on Wednesday. The union agreed on Thursday to suspend a strike that had closed down major ports on the East and Gulf coasts following an improved wage offer.

FROM PAGE 1A

## STRIKE

ILA and its combative president, Harold J. Daggett, a 78-year-old, third-generation dockworker who has led the union since 2011.

President Joe Biden, when asked about the tentative deal on the tarmac at Joint Base Andrews on Thursday evening, said: "We've been working hard on it. With the grace of God, it's going to hold."

A 62% increase would raise the top longshoremen's wage to just over \$63 per hour at the end of a new six-year contract, from today's \$39 per hour. And at \$63 an hour, the wages of East and Gulf Coast longshoremen would slightly exceed those that will be earned by West Coast longshoremen, who belong to a different union, at the end of their contract in 2027.

In the resumed talks, the issue of how much automation can occur at the ports could divide the sides. The union has also been pressing for improved retirement benefits.

Another potential sticking point is the pay of longshoremen who are just starting out and don't earn the top wage rate. Daggett's son, Dennis A. Daggett, a senior official at the ILA, said in an interview Tuesday on a picket line in Bayonne, New Jersey, that the union wanted to get higher wages for less experienced members.

Many businesses, expecting the strike, accelerated imports through the ports before the strike. But a long strike could have led to shortages, and it was already beginning to cause congestion in supply chains.

Perishable goods were particularly at risk from a strike. "I'm definitely relieved," Daniel J. Barabino, chief operating officer at Top Banana, a fruit distributor based at the Hunts Point Produce Market in New York City, said after the announcement Thursday. "I'm happy to have this behind us."

Around three-fifths of annual container trade goes through the East and Gulf Coast ports, including the Port of New York and New Jersey, the third-busiest in the country, and

fast-growing ports in Virginia, Georgia and Texas. The West Coast ports, which remained open during the strike, were getting close to capacity and would not have been able to absorb much more cargo diverted from East Coast ports.

Longshoremen, who load containers and other cargo off ships and onto trucks and trains, in general earn higher wages than workers in other blue-collar jobs.

When moving large amounts of goods in and out of the country, there is no practical alternative to ports. And ports cannot operate without longshoremen, giving them a strong hand in labor negotiations.

By going on strike and closing down the ports, the ILA deployed its leverage to get a higher wage offer from the Maritime Alliance. The employer group offered a raise of around 40% over the life of the contract, while the union sought 77%. The alliance then increased its offer to nearly 50%, before both sides agreed to 62%.

As businesses grew more concerned about the economic blow from a strike, they had pressed Biden to use the 1947 Taft-Hartley Act to force the longshoremen back to work. But throughout the dispute, he encouraged the sides to keep talking to reach a deal.

Biden administration officials worked behind the scenes with both sides to try to bring about a resolution in the days and weeks leading to the deal, according to people familiar with the White House's thinking. That culminated in a flurry of activity Thursday, including a trip by the acting labor secretary, Julie Su, to New Jersey to meet with the union's leaders to secure their agreement.

## THE HANFORD SITE



### Class 2 Modification to the Hanford Dangerous Waste Permit PUBLIC COMMENT PERIOD: Oct. 7 – Dec. 12, 2024

The U.S. Department of Energy (DOE) and contractor Washington River Protection Solutions are holding a 60-day public comment period on a proposed modification to the Hanford Dangerous Waste Permit. The Tank-Side Cesium Removal (TSCR) System pretreats tank waste for subsequent vitrification (immobilization in glass) at the Waste Treatment and Immobilization Plant Low-Activity Waste Facility.

This proposed permit modification would provide additional operational flexibility inside the TSCR System. Any minor weeps/seeps at mechanical connections that are observed by remote cameras but are insufficient in volume to activate the leak detection system would be addressed during the next maintenance outage. Daily visual inspections ensure weeps/seeps do not worsen and pose a threat to workers or the environment.

**The comment period runs from Oct. 7 through Dec. 12.** A public meeting will be held Oct. 30, at 5:30 p.m. PT. To participate via Microsoft Teams, please follow the instructions below:

**Join on your computer or Teams mobile app**  
<https://bit.ly/3X3M6kd>

**Or call in (audio only)**  
(833) 633-0875 United States (Toll-free)  
Phone Conference ID: 174 277 630#

Please submit any comments by **Dec. 12**, electronically or by mail to:  
Washington State Department of Ecology  
3100 Port of Benton Boulevard  
Richland, WA 99354  
<https://bit.ly/46JvC3Q> (preferred)

Copies of the proposed plan and supporting documentation will be available online during the public comment period in the Administrative Record at <https://bit.ly/4dGfbaR>. Hanford Public Information Repository locations are listed at <https://bit.ly/3X1jc36>.

Questions? Contact Jennifer Colborn, DOE, at [Jennifer.Colborn@rl.doe.gov](mailto:Jennifer.Colborn@rl.doe.gov) or Daina McFadden, Washington State Department of Ecology, at [Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov).

To request disability accommodation, contact [Jennifer.Colborn@rl.doe.gov](mailto:Jennifer.Colborn@rl.doe.gov) at least 10 working days prior to the event.



**From:** [Washington Department of Ecology](#)  
**To:** [McFadden, Daina \(ECY\)](#)  
**Subject:** Notice of Upcoming Public Comment Period on Proposed Changes to the Hanford Dangerous Waste Permit | Notificación del próximo período de comentarios públicos sobre los cambios propuestos en el permiso de residuos peligrosos de Hanford  
**Date:** Thursday, September 5, 2024 8:25:48 AM

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## THE HANFORD SITE

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

### **Notice of Upcoming Public Comment Period and Meeting on Proposed Changes to the Hanford Dangerous Waste Permit**

The U.S. Department of Energy (DOE) is planning a 60-day public comment period and meeting on a proposed Class 2 permit modification to the Hanford Dangerous Waste Permit. The permit modification addresses the Tank-Side Cesium Removal (TSCR) System. TSCR is the initial demonstration of the Low-Activity Waste Pretreatment System's capability to remove radioactive cesium and solids from low-activity, liquid tank waste prior to immobilization in glass for safe disposal.

The proposed permit modification would provide additional operational flexibility for the TSCR system.

**The comment period is expected to begin in early October, with a public meeting in late October.**

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

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

Questions? Contact Jennifer Colborn, DOE, at [Jennifer.Colborn@rl.doe.gov](mailto:Jennifer.Colborn@rl.doe.gov) or Daina McFadden, Washington State Department of Ecology, at [Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov).

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*Este es un mensaje del Departamento de Energía de los EE. UU.*

### **Aviso sobre el periodo de comentarios públicos sobre los cambios propuestos en el Permiso de Residuos Peligrosos de Hanford**

El Departamento de Energía de los EE. UU. (DOE) está planeando un periodo de 60 días de comentarios públicos y una reunión sobre una propuesta de modificación de Clase 2 del Permiso de Residuos Peligrosos de Hanford. La modificación del permiso se refiere al Sistema de Eliminación de Cesio del Lado del Tanque (TSCR). El TSCR es la demostración inicial de la capacidad del Sistema de Pretratamiento de Residuos de Baja Actividad para eliminar el cesio radiactivo y los sólidos de los residuos líquidos de baja actividad de los tanques antes de su inmovilización en vidrio para su disposición segura.

La propuesta de modificación del permiso proporcionaría una flexibilidad operativa adicional para el sistema TSCR.

**Se espera que el periodo de comentarios comience a principios de octubre, con una reunión pública a finales de octubre.**

La modificación propuesta y la documentación de respaldo están disponibles en línea durante el periodo de comentarios públicos en el [calendario de eventos](#) de Hanford, el [Registro administrativo](#) de Hanford y en los

[Repositorios de Información Pública.](#)

Cuando comience el periodo de presentación de observaciones se facilitará una hoja informativa resumida y los detalles de la reunión pública.

¿Tiene alguna pregunta? Comuníquese con Jennifer Colborn, DOE, en [Jennifer.Colborn@rl.doe.gov](mailto:Jennifer.Colborn@rl.doe.gov) o con Daina McFadden, Departamento de Ecología del Estado de Washington, en [Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov).

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This service is provided to you at no charge by [Washington Department of Ecology](#).

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This email was sent to [dmc461@ecy.wa.gov](mailto:dmc461@ecy.wa.gov) using GovDelivery Communications Cloud on behalf of: Washington Department of Ecology · 300 Desmond Drive SE · Lacey, WA 98503



**From:** [Washington Department of Ecology](#)  
**To:** [McFadden, Daina \(ECY\)](#)  
**Subject:** Notice of Upcoming Public Comment Period on Proposed Changes to the Hanford Dangerous Waste Permit | Notificación del próximo período de comentarios públicos sobre los cambios propuestos en el permiso de residuos peligrosos de Hanford  
**Date:** Monday, October 7, 2024 8:59:49 AM

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## THE HANFORD SITE

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

### **Public Comment Period and Meeting on Proposed Changes to the Hanford Dangerous Waste Permit**

The U.S. Department of Energy (DOE) is holding a 60-day public comment period on a proposed Class 2 permit modification to the Hanford Dangerous Waste Permit. The permit modification addresses the Tank-Side Cesium Removal (TSCR) System. TSCR is the initial demonstration of the Low-Activity Waste Pretreatment System's capability to remove radioactive cesium and solids from low-activity, liquid tank waste prior to immobilization in glass for safe disposal.

The proposed permit modification would provide additional operational flexibility for the TSCR system.

**The comment period will run from Oct. 7 through Dec. 12.** A hybrid public meeting will be held Oct. 30 at 5:30 p.m. PT in the Gallery Room of the Richland Public Library, 955 Northgate Drive, Richland, WA 99352. You may participate virtually using Microsoft Teams by following these instructions:

**Join on your computer or mobile app**

[Click here to join the meeting](#)

<https://bit.ly/3X3M6kd>

**Or call in (audio only)**

(509) 931-1284 United States

(833) 633-0875 United States (Toll-free)

Phone Conference ID: 174 277 630#

Please submit any comments by Dec. 12, [electronically](#) (preferred) or by mail to:

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

The proposed modification and supporting documentation will be available online during the public comment period on the Hanford [events calendar](#), the Hanford [Administrative Record](#) and at the [Hanford Public Information Repositories](#). Please see the summary [fact sheet](#) for additional information.

Questions? Contact Jennifer Colborn, DOE, at [Jennifer.Colborn@rl.doe.gov](mailto:Jennifer.Colborn@rl.doe.gov) or Daina McFadden, Washington State Department of Ecology, at [Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov).

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

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*Este es un mensaje del Departamento de Energía de los EE. UU.*

**Periodo de comentarios públicos y reunión sobre los cambios propuestos en el Permiso de Residuos Peligrosos de Hanford**

El Departamento de Energía de los EE. UU. (DOE) está organizando un periodo de 60 días de comentarios públicos sobre una propuesta de modificación de Clase 2 del Permiso de Residuos Peligrosos de Hanford. La modificación del permiso se refiere al Sistema de Eliminación de Cesio del Lado del Tanque (TSCR). El TSCR es la demostración inicial de la capacidad del Sistema de Pretratamiento de Residuos de Baja Actividad para eliminar el cesio radiactivo y los sólidos de los residuos líquidos de baja actividad de los tanques antes de su inmovilización en vidrio para su disposición segura.

La propuesta de modificación del permiso proporcionaría una flexibilidad operativa adicional para el sistema TSCR.

**El periodo de comentarios se extenderá del 7 de octubre al 12 de diciembre.** Se celebrará una reunión pública híbrida el 30 de octubre, a las 5:30 p. m. PT en la Sala de la Galería de la Biblioteca Pública de Richland, 955 Northgate Drive, Richland, WA 99352. Puede participar virtualmente vía Microsoft Teams siguiendo estas instrucciones:

**Únase desde su ordenador o aplicación móvil**

[Haga clic aquí para participar en la reunión](#)

<https://bit.ly/3X3M6kd>

**O llame (solo audio)**

(509) 931-1284 Estados Unidos

(833) 633-0875 Estados Unidos (llamada gratuita)

Identificación de la conferencia telefónica: 174 277 630#

Envíe sus comentarios antes del 12 de diciembre, [electrónicamente](#) (preferiblemente) o por correo a

Departamento de Ecología del Estado de Washington  
3100 Port of Benton Boulevard  
Richland, WA 99354

La modificación propuesta y la documentación de respaldo están disponibles en línea durante el periodo de comentarios públicos en el [calendario de eventos](#) de Hanford, el [Registro administrativo](#) de Hanford y en los [Repositorios de Información Pública de Hanford](#). Para obtener más información, consulte la [hoja informativa](#) resumida.

¿Tiene alguna pregunta? Comuníquese con Jennifer Colborn, DOE, en [Jennifer.Colborn@rl.doe.gov](mailto:Jennifer.Colborn@rl.doe.gov) o con Daina McFadden, Departamento de Ecología del Estado de Washington, en [Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov).

*Para solicitar una adaptación para discapacitados, comuníquese con Jennifer Colborn al (509) 376-5840 o [Jennifer.Colborn@rl.doe.gov](mailto:Jennifer.Colborn@rl.doe.gov) al menos 10 días laborables antes del evento. El DOE hace todo lo posible por atender las solicitudes de adaptación por discapacidad.*

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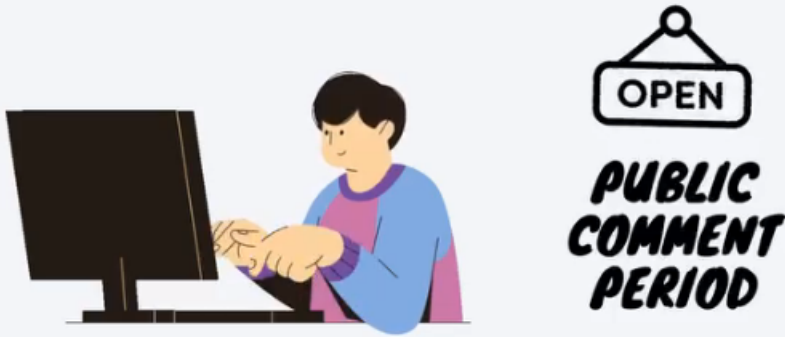
Washington Department of Ecology - Hanford

a day ago · 🌐

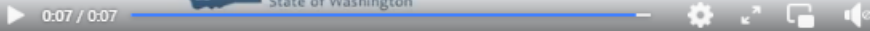
The public comment period for the Tank-Side Cesium Removal Mechanical Connections Class 2 permit modification is now open!

This comment period will run from Oct. 7 through Dec. 12, 2024.

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



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Tell us what you think.



## Tank-Side Cesium Removal Mechanical Connections Class 2 permit modification

Oct. 7 12:00 a.m. - Dec. 12, 2024, 11:59 p.m.

Energy is holding a 60-day public comment period on a proposed Class 2 permit modification to the Hanford Dangerous Waste Permit. The permit modification addresses the Tank-Side Cesium Removal (TSCR) System. TSCR is the initial demonstration of the Low-Activity Waste Pretreatment System's capability to remove radioactive cesium and solids from low-activity, liquid tank waste prior to immobilization in glass for safe disposal.

The proposed permit modification would provide additional operational flexibility for the TSCR system.

A hybrid public meeting will be held **Oct. 30, 2024**, at 5:30 p.m. PT in the Gallery Room of the Richland Public Library, 955 Northgate Drive, Richland, WA 99352.

You may participate virtually using [Microsoft Teams](#) or <https://bit.ly/3X3M6kd>.

### Or call in (audio only)

509) 931-1284 United States

(833) 633-0875 United States (Toll-free)

Phone Conference ID: 174 277 630#

Please submit any comments by **Dec. 12, 2024**, [electronically](#) (preferred) or deliver to:

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

The proposed modification and supporting documentation will be available online during the public comment period on the Hanford [events calendar](#), the Hanford [Administrative Record](#) and at the Hanford Public Information Repositories listed below. Please see the summary [fact sheet](#) for additional information.

Questions? Contact Jennifer Colborn, DOE, at [Jennifer.Colborn@rl.doe.gov](mailto:Jennifer.Colborn@rl.doe.gov) or Daina McFadden, Washington State Department of Ecology, at [Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov).

Para obtener una traducción al español, por favor visite [Hanford.gov](https://www.hanford.gov)