



Idaho High-level Waste and Facilities Disposition  
Draft Environmental Impact Statement  
U.S. Department of Energy Idaho Operations Office

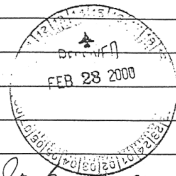
HLW & FD

EIS PROJECT - (AR/PF)  
Control # DC-30

Written Comment Form  
Must be postmarked or dated by March 20, 2000

February 18, 2000

Thomas L. Wichmann  
DOE Idaho  
ATTN: EIS Public Comment



Dear Mr. Wichmann,

30-1 [Thank you for holding the meeting in Jackson on  
11.6 February 9<sup>th</sup>. It helped clarify a complex problem.]

[After reading and considering your information  
I believe that the method of disposal should be  
30-2 The Direct Cement Waste Option which would  
11.6, 2-b (1) solidify the waste without moving it, but rather  
store in the stainless steel bins already placed 60 ft  
below ground and transport new liquid waste to WIPP.]

[Since INEL will continue to operate for some years,  
I think the alternative for closure should be

30-3 Closure to Landfill Standards in accordance with  
11.6 (1) state and federal requirements.] To summarize:

1. The Direct Cement Waste Option
2. Closure to Landfill Standards...

Sincerely,

Mrs. Joyce E. Batezel  
PO Box 513 Moose, WY 83012

Written comment forms may be faxed to:  
Thomas L. Wichmann  
EIS Document Manager  
208-526-1184

Written comment forms may be mailed to:  
Thomas L. Wichmann  
EIS Document Manager  
850 Energy Drive, MS 1108  
Idaho Falls, Idaho 83401-1563

Or send comments via the internet at: <http://www.jason.com/hlwfeis>



HLW & FD

EIS PROJECT - (AR/PF)  
Control # DC-31

TRI-CITY INDUSTRIAL DEVELOPMENT COUNCIL

901 N. Colorado, Kennewick, WA 99336-7685 USA 1-800-TRI-CITY 509-735-1000 509-735-6609 fax tridec@owt.com www.owt.com/tridec/



STATEMENT PREPARED FOR  
DEPARTMENT OF ENERGY PUBLIC HEARING  
ON DRAFT EIS REGARDING  
IDAHO HIGH LEVEL WASTE AND FACILITIES DISPOSITION  
PASCO, WASHINGTON  
FEBRUARY 24, 2000

The Tri-City Industrial Development Council (TRIDEC) is composed of over 350 dues paying individuals, organizations, and firms having an interest in the economic vitality and growth of the Tri-Cities area. We have been designated by the Department of Energy as the "one voice" spokesman for the Tri-Cities on economic development issues. We have a consistent record of interest in and support for the expeditious cleanup and restoration of the Hanford site and the utilization of site for economic diversification. We appreciate the opportunity to present the views of our organization on this draft EIS.

31-1 [The possible utilization of the Hanford Waste Vitrification Plant for the processing of high level  
11.6 (1) fuel processing wastes at Hanford could have a significant impact on the Hanford cleanup  
program.] [Based on currently available preliminary information, the use of the Hanford  
31-2 vitrification plant for processing and vitrification of the Idaho high level wastes would provide  
11.6 (4) significant cost savings to the Department of Energy over other realistic alternatives.] [The  
31-3 environmental impacts of this alternative appear to be equivalent or less than those of the other  
11.6 (4) alternatives.]

31-4 [However, this alternative has not been studied in sufficient depth to support a firm position for or  
11.6 (2) against this alternative at this time. If the use of the Hanford vitrification plant for the processing  
of the Idaho High Level Wastes is to be considered further a more detailed Environmental  
Impact Analysis of this alternative must be prepared and reviewed by the public including the  
State of Washington agencies having an interest in this subject.] [In the preparations of this  
analysis there are several considerations which must be included in the evaluation.

31-5 [The Hanford Waste Vitrification Plant must be adequately funded, completed, and in full  
11.6 (2) operation before any consideration can be given to the processing of off site wastes.]

31-7 [The processing of Idaho wastes cannot delay or interfere with the planned or accelerated  
11.6 (5) processing of Hanford wastes.]

31-8 [Consideration must be given to the impact that additions to the plant will have on local  
11.6 (2) governmental services, police, fire, roads, schools, etc.]

EXHIBIT #2  
HLW F&D EIS  
Pasco, WA  
February 24, 2000  
Name: Harold Heacock

- New Information -

Idaho HLW & FD EIS

D-41

DOE/EIS-0287

Document 31, Tri-City Industrial Development Council (Harold Heacock), Kennewick, WA  
Page 2 of 2

- 31-9  
11.E(6) • Any offsite wastes which are processed or vitrified in the plant must be returned to the sender or to a national repository. Interim or permanent disposal of the wastes at Hanford is not acceptable.
- 31-10  
11.E(3) • Full funding for all transportation, processing, and storage costs must be provided as an added increment to Hanford Environmental Management funding.
- 31-11  
VIII.H(3) • Consideration must be given to local environmental impacts resulting from the transportation and processing of the Idaho wastes.
- 31-12  
VIII.H(3) • Offsite transportation corridor safety, environmental impacts, and traffic issues must be thoroughly reviewed in cooperation with local and tribal governments. Provision must be made to alleviate any additional costs which may be incurred by local and state government agencies.
- 31-13  
11.E(3) • We believe that these issues are reasonable requirements that provide a bottom line basis for evaluation at the importation of high level wastes to Hanford for processing and vitrification. In view of the potential significant savings from the Hanford alternative that would accrue to the Department as compared to other feasible alternatives, this alternative should be given a more comprehensive evaluation than is currently available.

Thank you for the opportunity to present our views on this subject.

Document 32, U.S. Department of Commerce (Susan B. Fruchter), Washington, D.C.  
Page 1 of 2

Feb 28 00 11:10a EH-421 202 586-7031 p. 2



UNITED STATES DEPARTMENT OF COMMERCE  
Office of the Under Secretary for  
Oceans and Atmosphere  
Washington, D.C. 20250  
EIS PROJECT - AR/PF  
HLW & FD Control # DC-32

February 16, 2000

Ms. Carol M. Borgstrom, Director  
Office of NEPA Policy and Assistance  
Department of Energy  
Washington, DC 20585

Dear Ms. Borgstrom:

Enclosed are comments on the Draft Environmental Impact Statement for Idaho High-Level Waste and Facilities Disposition Rise, Idaho. We hope our comments can assist you. Thank you for giving us an opportunity to review this document.

Sincerely,

*Susan B. Fruchter*  
Susan B. Fruchter  
Acting NEPA Coordinator

Enclosure

FEB 23 2000  
EH-42



2

MEMORANDUM FOR: Susan B. Fruchter  
Acting NEPA Coordinator

FROM: Charles W. Challstrom  
Acting Director, National Geodetic Survey

SUBJECT: DEIS-0002-01 Idaho High-Level Waste and Facilities Disposition,  
Boise, Idaho

The subject statement has been reviewed within the areas of the National Geodetic Survey's (NGS) responsibility and expertise and in terms of the impact of the proposed actions on NGS activities and projects.

32-1  
VIII.F(1) [All available geodetic control information about horizontal and vertical geodetic control monuments in the subject area is contained on the NGS home page at the following Internet World Wide Web address: <http://www.ngs.noaa.gov>. After entering the NGS home page, please access the topic "Products and Services" and then access the menu item "Data Sheet." This menu item will allow you to directly access geodetic control monument information from the NGS data base for the subject area project. This information should be reviewed for identifying the location and designation of any geodetic control monuments that may be affected by the proposed project.

32-2  
VIII.F(1) [If there are any planned activities which will disturb or destroy these monuments, NGS requires not less than 90 days' notification in advance of such activities in order to plan for their relocation. NGS recommends that funding for this project includes the cost of any relocation(s) required.]

For further information about these monuments, please contact Rick Yorczyk; SSMC3 8636, NOAA, N/NGS; 1315 East West Highway; Silver Spring, Maryland 20910; telephone: 301-713-3230 x142; fax: 301-713-4175.

3

W. Brad DeBow  
2238 West 1000 South  
Rexburg, Idaho 83440-3754

February 25, 2000



Attn: Idaho HLW & FD EIS  
c/o: T. L. Wichmann, Document Director  
U.S. Department of Energy  
Idaho Operations Office  
850 Energy Drive, Mail Stop: 1108  
Idaho Falls, Idaho 83401-1563

HLW & FD

EIS PROJECT - AR Pf  
Control # DC -33

Dear Sir:

33-1  
VIII.D(9) I would like to submit the following comment on the Idaho HLW & FD EIS. This comment applies to the selection of a final option that both the State of Idaho and the DOE can agree on, and to three of the alternatives listed in the EIS that will be able to gain this joint agreement if my comment on the upgrade of the NWCF Calciner is accepted. [The three options to which I wish to comment are the Separations Alternative Planning Basis Option, the Non-Separations Alternative Hot Isostatic Pressed Option, and the Non-Separations Alternative Direct Cement Waste Option.

33-2  
VIII.D(9) These three options all involve pre-treatment of the liquid tank farm waste with the NWCF Calciner. This pre-treatment is the only way that the Settlement Agreement requirement of having the Sodium Bearing Waste (SBW) removed from the tank farm by 2012 has a chance of being met. It is my opinion and my input to this process that this portion of the Settlement Agreement must be complied with whichever option is finally selected. [The liquid waste is by far the most hazardous of the various forms of waste] and the State of Idaho was correct in insisting this form be eliminated by the soonest possible date, which is 2012. As a citizen of the area near where that liquid waste is stored, I cannot emphasize enough my comment that the 2012 date previously agreed to in a court ordered Settlement Agreement with the State of Idaho must be complied with.

33-3  
VIII.C(9) [It appears to me that this EIS process is being used as a vehicle to abrogate the Settlement Agreement with the State of Idaho. Specifically, it appears that the compliance with the 2012 date for the conversion of the liquid waste to a solid form is at risk. The EIS states that it would be difficult to stop using the tank farm by 2012. Oddly enough, the State of Idaho itself seems responsible for this attempted abrogation of responsibility through its insistence on the requirement to permit and MACT upgrade the Calciner. This permit and upgrade step is written in to every option in which the Calciner would be used to pre-treat the liquid waste. [The cost, in both dollars and more importantly time, to accomplish the MACT upgrade on the Calciner is not acceptable.] The options that involve running the Calciner must be considered without the permit and MACT upgrade aspects. This would allow the Calciner to continue operation after June 1, 2000 and accomplish the most critical aspect of the Settlement Agreement, the elimination of the liquid SBW by 2012.]

- New Information -

Idaho HLW & FD EIS

D-43

DOE/EIS-0287

33-6  
III.C.10) The State of Idaho is telling the DOE on one hand that the liquid SBW must be solidified by 2012, and on the other hand that the only method of accomplishing that feat, the use of the Calcliner, must be halted by June 1, 2000 because of emission requirements. I do not consider this acceptable behavior on the part of my State elected representatives, and so inform them by copy of this letter. The Calcliner has operated for a number of years without a MACT upgrade and is perfectly capable of completing its mission without impacting the environment.

33-7  
VII.D.2) Instead of using this EIS as a vehicle to abrogate the requirement to solidify the liquid waste by 2012, DOE should instead be confronting the issue directly with the State of Idaho. The Calcliner is not an incinerator, by EPA's or any other definition of the word. I have looked at 40 CFR Part 60, et al. NESHAPS Standards, and have two conclusions. The Calcliner does not fit the EPA definition of a Hazardous Waste Combustor, and the emissions requirements would accomplish nothing meaningful in the desert environment where the Calcliner is located. On the other hand, the solidification of the liquid SBW waste by 2012 through the operation of the Calcliner through this period would greatly reduce the risk to the subterranean environment. It is a shame our State bureaucrats seem unable to grasp these simple facts.

33-10  
III.C.6) To elaborate on one area of the NESHAPS Standards the State bureaucrats are attempting to impose on the Calcliner, on page 52832 of this document, the MACT rules are established for three source categories, namely: Hazardous waste burning incinerators, hazardous waste burning cement kilns, and hazardous waste burning lightweight aggregate kilns. These three source categories are referred to collectively as hazardous waste combustors in the EPA regulations. The NWCF Calcliner fits none of these categories. It is not a combustor, it is a Calcliner. The Calcliner is a much higher technology facility than the commercial waste combustors that may be put up by commercial industries and utilities. A reading of the EPA regulations makes it very clear they were directed at the low technology units put up by commercial industrial plants and city utilities.

33-11  
III.C.6) To further support these facts, I would like to reference you to an EPA document. EPA530-R-97-057/PB98-108 129, November, 1997 is a Hotline Training Module for EPA hotline phone specialists on incineration regulations and definitions. In this document, incineration is defined as a technology to destroy hazardous waste. The Calcliner certainly does not destroy the waste, but converts it from liquid to solid state.

33-12  
III.C.6) Another EPA document defining incinerators is the Final Technical Support Document for HWCMACT Standards, July, 1999. This document has a detailed description of incinerators that is very clear does not include the NWCF Calcliner process. As an example, in its definition of a fluidized bed incinerator it describes how the bed media acts to scrub the waste particles, exposing fresh surface by the abrasion process which encourages rapid combustion of the waste. The Calcliner process can be described as the opposite of that, where the waste particles are encouraged to adhere to the bed material and are not combusted, but carried off as waste transformed from liquid to solid.

33-13  
III.C.6) The DOE must face this problem directly with the State and obtain concurrence for the continued operation of the Calcliner beyond June 1, 2000.

Very truly yours,

*W. Brad DeBow*  
W. Brad DeBow



HLW &amp; FD

EIS PROJECT - (AR)/PF

Control # M-34

TRI-CITY INDUSTRIAL DEVELOPMENT COUNCIL

901 N. Colorado, Kennewick, WA 99336-7685 USA 1-800-TRI-CITY 509-735-1000 509-735-6609 fax tridec@owt.com www.owt.com/tridec/

February 28, 2000

Mr. Thomas L. Wichmann, Document Manager  
U.S. DOE, Idaho Operations Office  
850 Energy Drive, MS 1108  
Idaho Falls, ID 83401-1563

Public Comments Regarding  
Idaho HLW & FD EIS

Dear Mr. Wichmann:

We are submitting herewith a copy of our testimony which was presented at the February 24, 2000 public hearing in Pasco, WA. This submittal is for record purposes and contains several minor editorial corrections from the public comments.

Very truly yours,

*Sam Volpentest*  
Sam Volpentest  
Executive Vice President



TRI-CITY INDUSTRIAL DEVELOPMENT COUNCIL

901 N. Colorado, Kennewick, WA 99336-7685 USA 1-800-TRI-CITY 509-735-1000 509-735-6609 fax tridec@owt.com www.owt.com/tridec/

STATEMENT PREPARED FOR  
DEPARTMENT OF ENERGY PUBLIC HEARING  
ON DRAFT EIS REGARDING  
IDAHO HIGH LEVEL WASTE AND FACILITIES DISPOSITION  
PASCO, WASHINGTON  
FEBRUARY 24, 2000

The Tri-City Industrial Development Council (TRIDEC) is composed of over 350 dues paying individuals, organizations, and firms having an interest in the economic vitality and growth of the Tri-Cities area. We have been designated by the Department of Energy as the "one voice" spokesman for the Tri-Cities on economic development issues. We have a consistent record of interest in and support for the expeditious cleanup and restoration of the Hanford site and the utilization of site for economic diversification. We appreciate the opportunity to present the views of our organization on this draft EIS.

- 34-1  
11.E(5) [The possible utilization of the Hanford Waste Vitrification Plant for the processing of high level fuel processing wastes at Hanford could have a significant impact on the Hanford cleanup program. Based on currently available preliminary information, the use of the Hanford vitrification plant for processing and vitrification of the Idaho high level wastes would provide significant cost savings to the Department of Energy over other realistic alternatives. The environmental impacts of this alternative appear to be equivalent to or less than those of the other alternatives.]
- 34-2  
11.E(4)
- 34-3  
11.E(4)
- 34-4  
VII.A(2) [However, this alternative has not been studied in sufficient depth to support a firm position for or against it at this time. If the use of the Hanford vitrification plant for the processing of the Idaho High Level Wastes is to be considered further a more detailed Environmental Impact Analysis of this alternative must be prepared and reviewed by the public including the State of Washington agencies having an interest in this subject. In the preparation of this analysis there are several considerations which must be included in the evaluation.]
- 34-5  
11.E(2) • The Hanford Waste Vitrification Plant must be adequately funded, completed, and in full operation before any consideration can be given to the processing of off site wastes.]
- 34-7  
11.E(5) • [The processing of Idaho wastes cannot delay or interfere with the planned or accelerated processing of Hanford wastes.]
- 34-8  
VIII.1(2) • [Consideration must be given to the impact that additions to the plant will have on local governmental services, police, fire, roads, schools, etc..]

- 34-9  
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- 34-11  
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- 34-12  
VIII.H(3) • [Offsite transportation corridor safety, environmental impacts, and traffic issues must be thoroughly reviewed in cooperation with local and tribal governments. Provision must be made to alleviate any additional costs which may be incurred by local and state government agencies.]
- 34-13  
11.E(3)
- 34-14  
11.E(4) We believe that these issues are reasonable requirements and provide a bottom line basis for evaluation of the importation of high level wastes to Hanford for processing and vitrification. In view of the potential significant savings from the Hanford alternative, that would accrue to the Department, as compared to other feasible alternatives, this alternative should be given a more comprehensive evaluation than is currently available.]

Thank you for the opportunity to present our views on this subject.

D-45

DOE/EIS-0287

- New Information -

Idaho HLW & FD EIS