Written Comment Form

Must be postmarked or dated by March 20, 2000

February 18, 2000

Dear Mr. Wichmann:

I wish to provide my comments in response to the February 9th letter

Thank you for providing the meeting in Jackson on February 9th. It didn’t appear to be a problem.

After reading and understanding your information, I believe that the proposed disposal should be.

The existing Concept Waste option and it would be preferred over the waste without making it at.

After both the standards and the Idaho Falls proposal is fit

I believe the standards should be.

Closure to Tri-City Standards as discussed with

The existing Concept Waste option

Sincerely,

[Signature]

Thomas L. Wichmann

EIS Project Manager

208-520-1108

Idaho Falls, Idaho 83401-1553

Or send comments via the internet at: http://www.jascom.com/hlwfd/
Document 31, Tri-City Industrial Development Council (Harold Heacock), Kennewick, WA
Page 2 of 2

- New Information -

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

February 16, 2000

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

Dear Ms. Borgetson:

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

Sincerely,

Susan B. Fruchter
Acting NEPA Coordinator

Enclosure
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  32-2  
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 database 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.  

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 8676, NOAA, NNGS; 1315 East West Highway; Silver Spring, Maryland 20910; telephone: 301-713-9250 x142; fax: 301-713-4175.
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 Calinizer, 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 Calinizer has operated for a number of years without a MACT upgrade and is perfectly capable of completing its mission without impacting the environment.

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 Calinizer 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 Calinizer 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 Calinizer is located. On the other hand, the solidification of the liquid SBW waste by 2012 through the operation of the Calinizer through this period would greatly reduce the risk to the environment.

To elaborate on one area of the NESHAPS Standards the State bureaucrats are attempting to impose on the Calinizer, 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 light weight aggregate kilns. These three source categories are referred to collectively as hazardous waste combustors in the EPA regulations. The NWCP Calinizer fits none of these categories. It is not a combustor, it is a Calinizer. The Calinizer is a much higher technology facility than the commercial waste combustors that may be run 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.

To further support these facts, I would like to refer you to an EPA document, EPA-530-R-97-009 PB98-128 129, November, 1997 is a Hotline Training Module for EPA hotline phone specialists on incinirator regulations and definitions. In this document, incineration is defined as a technology to destroy hazardous waste... the Calinizer certainly does not destroy the waste, but converts it from liquid to solid state.

Another EPA document defining incinirators is the Final Technical Support Document for HWF MACT Standards, July, 1999. This document has a detailed description of incinirators that is very clear does not include the NWCP Calinizer process. As an example, in its definition of a fluidized bed incinirator 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 Calinizer process can be described as the opposite of this, where the waste particles are encouraged to adhere to the bed media and are not combusted, but carried off as waste transformed from liquid to solid.

The DOE must face this problem directly with the State and obtain concurrence for the continued operation of the Calinizer beyond June 1, 2000.

Very truly yours,

W. Brad DeBow
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.

The possible utilization of the Hanford Waste Vitrification Plant for the processing of high level fuel processing waste 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.

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.

- 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.

- The processing of Idaho wastes cannot delay or interfere with the planned or accelerated processing of Hanford wastes.

- Consideration must be given to the impact that adding to the plant will have on local governmental services, police, fire, roads, schools, etc.

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.