



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 7, 2019

19-NWP-089

Brian T. Vance, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Test Bed Initiative Phase II Permit

Dear Brian T. Vance:

I am writing to acknowledge that the Department of Ecology (Ecology) received the United States Department of Energy's (USDOE) June 06, 2019 withdrawal of its permit application for Phase II of the Test Bed Initiative (TBI). Pursuant to your request, Ecology will stop processing the TBI permit application.

We are, however, both puzzled and frustrated by the withdrawal. We are puzzled because you cite the May 29, 2019 letter from Maia Bellon to Anne White as a reason behind your withdrawal. We note that nothing in Director Bellon's letter mentioned TBI, and nothing in the letter provided any indication that this demonstration project to prove the TBI concept could not, or should not, go forward. As Ecology and Director Bellon have stated to you in prior correspondence, the State understood that TBI was a priority for the USDOE's Environmental Management Program, and were moving forward expeditiously to process the TBI permit to meet USDOE's timelines.

We are frustrated because Ecology added the TBI permitting workload to staff already overloaded with Direct Feed Low Activity Waste permitting to meet USDOE's schedule for that project. We asked our staff to go above and beyond and put in countless extra hours to process the TBI permit, which they did with extraordinary skill and efficiency. To have USDOE pull that permit application the day before it was to go out for public comment makes little sense to the State. It makes even less sense when there was no explicit or implicit connection to TBI in the letter Director Bellon sent to Anne White on May 29.

The message the permit withdrawal sends is that TBI is not a true priority for the Hanford tank waste mission or necessary to USDOE meeting its waste treatment obligations at Hanford, both of which were concerns the State of Washington raised when Phase II of TBI was proposed. While we appreciate the collaborative effort our two agencies put into meeting USDOE's timeline and getting the TBI permit ready for public comment, we are disappointed that our collective efforts are again for naught, as USDOE changes course yet again.

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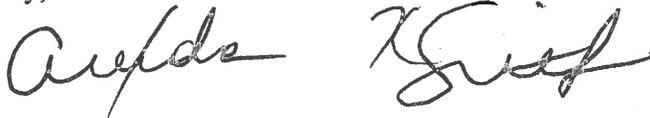


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If you have any questions, please contact me at alex.smith@ecy.wa.gov, or (509) 372-7905.

Sincerely,



Alexandra K. Smith
Program Manager
Nuclear Waste Program

cc electronic:

Dave Einan, EPA
John Eschenburg, WRPS
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Ken Niles, ODOE
John Martell, WDOH
Environmental Portal
MSA Correspondence Control
USDOE-RL Correspondence Control
WRPS Correspondence Control
Senator Patty Murray
Senator Maria Cantwell
Representative Adam Smith
Representative Dan Newhouse

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Matt Johnson, CTUIR
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Hanford Administrative Record
NWP Central File