

WM PEIS

Comments

TSE-0031/014

So, I am joining the chorus, asking for the Waste Management EIS to be withdrawn, reworked, so that we can feel the whole elephant, so we can understand what the nation is expecting of all of the sites in the country that are taking waste and giving waste, before we begin to accept new waste.

Response

The WM PEIS (DOE 1997b) was a comprehensive evaluation of DOE nationwide waste management. The WM PEIS evaluated a broad suite of alternatives for waste management across the DOE complex, including managing most waste at generator facilities, or consolidating waste management at fewer sites that have existing facilities suitable to accept waste from other facilities. The impacts of those alternatives were compared for a variety of waste volumes at different DOE sites, including larger quantities of waste than are evaluated in the HSW EIS. The general result of the WM PEIS was that radioactive and hazardous wastes generated at a DOE site should be disposed of at that site unless the site was not capable of or not technically able to support those actions. DOE determined there was sufficient information in the WM PEIS to support decisions regarding the sites that were suitable for long-term waste management missions. Those decisions included processing and disposing of Hanford waste at Hanford, and the importation of wastes from other sites that could not adequately handle them. A discussion of the WM PEIS is provided in Volume I Section 1.5. Decisions made as part of the WM PEIS made Hanford available for the disposal of low-level waste and mixed low-level waste from other DOE generators. The initial WM PEIS decisions related to LLW, MLLW, and TRU waste were issued between January 1998 and February 2000.

The total amount of radioactivity expected to leave Hanford is much greater than the amount of radioactivity expected to come to Hanford. About 400 MCi of radioactivity are currently onsite. About 375 MCi are expected to be shipped to the Waste Isolation Pilot Plant in New Mexico, the geologic repository for spent nuclear fuel and high-level waste proposed for Yucca Mountain in Nevada, and other places. Less than 10 MCi would be expected to come to Hanford even if all the offsite waste evaluated in this HSW EIS were to come to Hanford. See Volume I Section 1 Figure 1.4.

DOE believes this HSW EIS complies with applicable NEPA requirements.

Comments

P-0021/001

Please explain why Hanford is now being considered for more toxic waste. The clean-up of radioactivity has barely begun and now we're supposed to take on more?

Response

The HSW EIS evaluates the consequences of various site-specific alternatives to the ongoing waste management program at Hanford, consistent with WM PEIS (DOE 1997b) decisions regarding certain TRU waste, LLW, and MLLW streams. Site-specific waste management actions at Hanford involve transportation, treatment and processing of TRU waste and MLLW, disposal of LLW, MLLW and ILAW, and storage of LLW, MLLW, and TRU waste. A discussion of the WM PEIS and other NEPA review documents relevant to the HSW EIS can be found in Volume I Section 1.5.

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DOE is committed to cleaning up the Hanford Site in accordance with the Tri-Party Agreement (TPA) and applicable environmental requirements under federal and state laws and regulations. As of February 1, 2003, DOE had met 99% of its TPA milestones on or ahead of schedule. A lot in the way of cleanup has happened at Hanford over the last decade. Portions of the site have already been cleaned up, removed from the National Priority List (NPL), and released for other uses (e.g., the 1100 Operable Unit). As part of the river corridor cleanup, DOE is remediating contaminated soil sites, decommissioning the plutonium production reactors and associated facilities, removing production reactor fuel from the K Basins to interim storage in the 200 Area, and treating groundwater contaminated by past operations. Groundwater contamination beneath the Hanford Site is being studied and remediated by the ongoing CERCLA program in accordance with the Tri-Party Agreement. See Volume II Appendix N, Section N.2.4. See Volume III Section 2.0, Item 6 of the CRD for more examples of cleanup at Hanford.

DOE is responsible for the cleanup of dozens of sites around the country. DOE's approach is to consolidate and dispose of radioactive waste from all its cleanup efforts in the safest and most cost-effective manner possible. Hanford and other sites would be available for the disposal of low-level waste and mixed low-level waste; WIPP is used for the disposal of TRU waste; Yucca Mountain is expected to be used for the disposal of high-level waste and spent nuclear fuel. Many more curies of waste will be sent offsite from Hanford than will be received from offsite. Analysis indicates that these wastes could be handled without complicating future remediations, or diverting resources or disposal capacity from other Hanford cleanup activities.

The Hanford clean-up effort is expected to be completed in 2035, followed by a long-term stewardship program that ensures waste remaining onsite is appropriately managed.

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Comments

F-0013/001

It [the SW EIS draft] fails to address reasonable alternatives to solid waste disposal at Hanford.

Response

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most waste at generator facilities, or consolidating waste management at fewer sites that have existing facilities suitable to accept waste from other facilities. The impacts of those alternatives were compared for a variety of waste volumes at different DOE sites, including larger quantities of waste than are evaluated in the HSW EIS. The general result of the WM PEIS was that radioactive and hazardous wastes generated at a DOE site should be disposed of at that site unless the site was not capable of or not technically able to support those actions. DOE determined there was sufficient information in the WM PEIS to support decisions regarding the sites that were suitable for long-term waste management missions. Those decisions included processing and disposing of Hanford waste at Hanford, and the importation of wastes from other sites that could not adequately handle them. Decisions made as part of the WM PEIS made Hanford available for the disposal of low-level waste and mixed low-level waste from other DOE generators. The initial WM PEIS decisions related to LLW, MLLW, and TRU waste were issued between January 1998 and February 2000.

The HSW EIS evaluates alternatives for disposal of LLW, MLLW, ILAW, and WTP melters in either independent or combined-use facilities that comply with RCRA and state standards for disposal of hazardous wastes. The alternatives have been configured consistent with the WM PEIS and its records of decision, the HSW EIS notice of intent, and comments received during public review periods. Descriptions of these alternatives are presented in Volume I Section 3. Volume I Figure 3.1 shows the many options possible for treatment, storage, and disposal of HSW EIS waste streams. Options include a No Action Alternative, waste disposal in LLBG trenches, waste disposal in the Environmental Restoration Disposal Facility (ERDF) and in ERDF-like mega-trenches at various locations, use of lined and capped facilities that would comply with Resource Conservation and Recovery Act (RCRA) Subtitle C hazardous waste requirements, and disposal of LLW in lined trenches with leachate collection systems that would meet the substantive requirements of federal and state hazardous waste management regulations. The HSW EIS does not evaluate any alternatives for the disposal of MLLW in trenches that are not lined and that do not fully meet RCRA Subtitle C requirements. The potential environmental impacts of the HSW EIS alternatives are presented in Volume I Section 5 and related Volume II appendixes.

Comments

TLG-0002/005

We're also troubled by the entire process. In 1999, the Federal Government did a national Environmental Impact Statement, they said "Hanford and the Nevada test site are our choices for places to dispose of large amounts of mixed low-level radioactive waste and low-level radioactive waste." And that there would be site-specific analysis to basically affirm that that was the right decision to make. And instead, as we read this, we see that this Environmental Impact Statement doesn't necessarily validate that decision. It assumes that was the correct decision. In making that assumption, then it looks only at disposing of waste at Hanford.

Response

The HSW EIS evaluates the consequences of various site-specific alternatives to the ongoing waste management program at Hanford, consistent with WM PEIS (DOE 1997b) decisions regarding certain TRU waste, LLW, and MLLW streams. Site-specific waste management actions at Hanford involve transportation, treatment and processing of TRU waste and MLLW, disposal of LLW, MLLW and ILAW, and storage of LLW, MLLW, and TRU waste. A discussion of the WM PEIS and other NEPA review documents relevant to the HSW EIS can be found in Volume I Section 1.5.

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regarding the sites that were suitable for long-term waste management missions. Those decisions included processing and disposing of Hanford waste at Hanford, and the importation of wastes from other sites that could not adequately handle them. Decisions made as part of the WM PEIS made Hanford available for the disposal of low-level waste and mixed low-level waste from other DOE generators. The initial WM PEIS decisions related to LLW, MLLW, and TRU waste were issued between January 1998 and February 2000.

This HSW EIS evaluates a range of waste receipts at Hanford to encompass the uncertainties regarding quantities of waste that would ultimately be managed at the site. This HSW EIS now includes an evaluation of Hanford Only waste in Volume II Appendix M. A Hanford Only waste volume was evaluated to better show the incremental impacts to Hanford of managing waste from offsite generators.

Comments

L-0033/005

NEPA makes specific requirements against attempts to piecemeal the decision making process in order to conceal the true impact of the decision. This EIS must disclose and evaluate the environmental impact of the total amount of Transuranic waste that is proposed to be shipped to Hanford. The courts have ruled that the Waste Management Programmatic Environmental Impact Statement is inadequate. Reliance upon the Record of Decision issued in February 2000 makes this EIS inadequate.

L-0039/023

Environmental Restoration wastes (not adequately addressed in the WMPEIS). The Board advised DOE in Advice Number 133 that many stakeholders felt that the WMPEIS analysis was not detailed enough to support selection of Hanford as a repository for complex-wide disposal of LLW and MLLW. The WMPEIS excluded Environmental Restoration waste from analysis. Consequently, the WMPEIS can make no decisions, and it provides no authority for deciding what to do with such wastes. The WMPEIS notes:

“If DOE had sufficient information about the ER transferred wastes, it would analyze their impacts in the same manner as the impacts of the WM wastes are evaluated in the WMPEIS. Unfortunately, DOE still does not have sufficient information on the volume or contaminant composition of these wastes to perform a meaningful impact evaluation at this time.” Page 1-42

“Additionally, very little information is available to DOE about the composition of environmental wastes. This prevents the Department from evaluating the impacts of managing these wastes at this time.” Page 1-42

THR-0004/005

As Greg mentioned, there are process concerns also, because we have the Programmatic EIS that was developed back in the late '90s. Things have changed. Things have modified. We've improved. We know more now than we did then. Let's incorporate that information.

Response

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DOE believes this HSW EIS complies with applicable NEPA requirements.

The HSW EIS uses best available data for estimating inventories of hazardous and radioactive wastes. These data are obtained from information management systems maintained at Hanford and other DOE sites. Most of the waste will be generated by environmental restoration activities, and there is uncertainty about the amounts that will be generated. Areas of uncertainty are discussed in Volume I Section 3.5.

The WM PEIS provided a comparative basis among DOE sites supporting decisions regarding the Department's national waste management strategy. Some of the site-specific actions associated with these roles may involve additional environmental reviews such as that provided in this HSW EIS. Similarly, decisions and actions to support DOE's compliance with RCRA and CERCLA are site-specific in nature and would be conducted accordingly.

Comments

L-0055/008

Clearly some high level waste such as the melters from the Vitrification facility and ground water will remain on the Hanford site. The characterization of Hanford as a low level and mixed waste repository is misleading. A detailed understanding of the complete volume of waste at Hanford and nationally is necessary, it is inappropriate to conduct this analysis as a single narrowly defined project. This decision requested again is to allow for the storage of a yet quantified amount of Mixed Low Level radioactive waste and Low Level radioactive waste. DOE-RL has already received TRU waste from other sources without the capacity to treat and dispose of waste. The fact that some hazardous waste is currently being treated off site by commercial entities without the discussion of the volume of that waste is also an issue.

Response

The HSW EIS evaluates the consequences of various site-specific alternatives to the ongoing waste management program at Hanford, consistent with WM PEIS (DOE 1997b) decisions regarding certain TRU waste, LLW, and MLLW streams. Site-specific waste management actions at Hanford involve transportation, treatment and processing of TRU waste and MLLW, disposal of LLW, MLLW and ILAW, and storage of LLW, MLLW, and TRU waste. A discussion of the WM PEIS and other NEPA review documents relevant to the HSW EIS can be found in Volume I Section 1.5.

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The Hanford Only waste volume has been evaluated in all action alternatives and the No Action Alternative to provide a better comparison with the impacts of adding offsite waste. The incremental impacts of offsite waste are the differences between the Lower and Upper Bound Volumes and the Hanford Only impacts for a given alternative.

Part of the purpose of the EIS is to allow DOE to obtain additional treatment capability to support cleanup of the Hanford Site. LLW and MLLW received from offsite generators is assumed to meet applicable treatment standards and arrives ready for disposal.

Regarding TRU waste received from other sites, DOE plans to temporarily store this waste and prepare it for shipment to WIPP for disposal. The TRU waste will not be disposed of at Hanford.

The HSW EIS evaluates several alternatives for treatment of waste to allow disposal in accordance with the HSSWAC. Alternatives include offsite commercial treatment, onsite treatment in existing facilities, and treatment at a new onsite facility. All action alternatives evaluated in the EIS include treatment and final disposal of waste. The No Action alternative, mandated for evaluation under NEPA, is the only alternative in which waste would remain in storage indefinitely.

Comments

E-0043/006, EM-0217/006, EM-0218/006, L-0056/006, LM-0017/006, LM-0018/006

Also, because the PEIS did not contain analysis of the impacts of RCRA and CERCLA ER wastes, the PEIS is not an authority for decisions regarding these wastes.

E-0055/018

The Waste Management Programmatic EIS (USDOE, 1997) (WMPEIS) [DOE, 1997] was admitted to be legally inadequate for failure to include Environmental Restoration (ER) program wastes which would be transferred to sites such as Hanford for disposal as part of the Waste Management Program. USDOE violates both NEPA and commitments made pursuant to litigation over the WMPEIS to consider:

- the impacts of transfers of ER wastes to Hanford;
- the chemical and radiological properties of ER wastes proposed to be shipped to Hanford;
- cumulative impacts from adding ER wastes to: a) Hanford's own existing and future wastes requiring disposal; and, b) USDOE's Waste Management Program wastes.

Response

The WM PEIS provided a comparative basis among DOE sites supporting decisions regarding the Department's national waste management strategy. Some of the site-specific actions associated with these roles may involve additional environmental reviews such as that provided in this HSW EIS. Similarly, decisions and actions to support DOE's compliance with RCRA and CERCLA are site-specific in nature and would be conducted accordingly.