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P-I OPINION

Don't dump more waste at Hanford

The Department of Energy holds a hearing on its Hanford environmental impact statement at 7 p.m. Thursday in the Woodland Park Zoo auditorium.

The federal Department of Energy's plans for Hanford should be stamped with one of those scary radiation symbols. The Bush administration is proposing to send more trucks bearing hazardous nuclear waste into Washington.

What are they thinking in that other Washington? Hanford makes a lousy site for a nuclear dump because it's right next to the Columbia River. Yet the administration suggests it can accommodate up to 70,000 additional truckloads.

The Energy Department's plan raises serious technical questions immediately. It's not even clear how quickly Hanford will carry out a promise to stop burying nuclear waste in unlined trenches - something you or your local landfill couldn't do with ordinary household garbage.

What's worse, the feds have set a hearing schedule so fast that there's hardly time to worry about pesky details. The already started comment period is 45 days, ending May 27.

The state Department of Ecology doesn't expect to have its analysis of the proposal finished in time to comment at a Thursday hearing in Seattle. The Energy Department's own Hanford Advisory Board, a group critical to good faith dealings on nuclear issues, doesn't have a meeting scheduled before the comment period ends. One advisory board member, activist Gerald Pollet of Heart of America Northwest, says the Energy Department has promised it will consider a post-deadline comment as "practicable."

Hanford has done a good deal in recent years to improve its operations. But the importation of additional waste makes little sense without strict conditions.

To its credit, the Energy Department is trying to deal with waste scattered at sites all over the country. And Hanford will gain some limited benefits as some of its waste is moved to New Mexico and, eventually, Nevada.

But any plans to dump nuclear waste in Washington - especially near our magnificent river - is alarming. Hanford already has a history of nuclear contamination - something we should not let happen again.

On the Net:
www.hanford.gov

Are you sure this is what you wanted to do when you grew up?

1 | Please - no more hazardous waste near our Columbia River.
 Anne A. Smith
 1604-28th Ave W
 Seattle, WA 98179-4205
638742 © 1999 Inc.

May 13, 2003

Dear Micheal Collins,

Please Stop Hanford from
receiving anymore nuclear
waste.

1 We can't handle any more
waste at Hanford!

We've got to put this to a
STOP

Thank you
Eric Wikstrom

L-0026

This document was submitted twice by the addressee.
See E-0019 for the original e-mail that was submitted.

102 Otis St.
Walla Walla, WA
99362
May 9, 2003

Dear Mr. Klein,

- 1** | I passionately oppose the US Dept. of Energy plan to bring in 70,000 truckloads of new radioactive and chemical waste to be buried in unlined trenches at Hanford. The current mission of Hanford is cleanup. Doubling the total amount of radioactive and chemical waste, including deadly plutonium, is the very opposite of cleanup. Unlined trenches provide no protection from soil and groundwater contamination. Contaminated groundwater would flow into the Columbia River for thousands of years! Birth defects and cancer would be our legacy to countless future generations in the Columbia Basin and beyond.
- 2** |
- 3** | The very transporting of nuclear waste creates frightening risks to human and environmental health in all the states through which it travels. Either an accident or a terrorist act could bring instant catastrophe.
- 4** | Please spend all funding on cleanup, not on increasing the radioactive waste problem. The DOE is morally and legally obliged to live up to the Tri-Party agreement to meet all deadlines for vitrification and not try to escape its obligations by reclassifying deadly waste as harmless.
- 5** |

Sincerely yours,



Beth Call

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MAY 12 2003

DOE-RL/RLCC

L-0028

614 Randolph Place
Seattle, WA 98122
May 15, 2003

Mr. Mike Collins
U.S. Department of Energy
P.O. Box 550 A6-38
Richland, WA 99352

Dear Mr. Collins:

- 1 | We are writing to express our concern about the plans of the Department of Energy to send highly radioactive trash from out of state to the Hanford Nuclear Reservation.
- 2 | As you know, there have been efforts over many years to clean-up the Hanford
3 | Reservation. These plans negate the progress that has been made and current efforts in
4 | court are only delaying further cleanup. The decision is a violation of requirements
Of the National Environmental Policy Act of 1969. The dumping of nuclear waste in the
state of Washington is particularly hazardous because of the high risk of earthquakes.
- 4 | We urge you to re-consider the current plan and act to move these materials to the New Mexico site as the state of Washington is demanding.

Sincerely,

Lynne & David Chelimer
Lynne and David Chelimer

5/19/03

Dear Fellow Citizen :

1 I am grateful to be allowed to express my observations of the Hanford waste program E.I.S.. I love my state and am thankful for all the effort work that has gone into the project so far to clean up 60 yrs of the most poisonous substances known to man. I am not a scientist but after reading the documents you provided there are some points I would like to call your attention to :

2 1. The document correctly states the unknown factors are many and the future outcome can only be guessed at.

3 2. Poisons are many and have already entered the ground water and the Columbia River upstream from large cities (populations) whose size we can only guess 10,000 years from now will be.

4 3. All containment designs will eventually fail sending dangerous poisons into the Columbia River.

5 4. It seems to me instead of bringing more poison to an area so close to a major river, covered by a major flood in the past with sags, springs and unknown water table. Plans would be made to remove to a more arid, stable site, like the national repository in New Mexico - these poisons!

God be with you in your dangerous and difficult task.

Mr. & Mrs J.C. Biggs
2754 NE 89TH St. Sea Wa. 98115

L-0030

4205 No. 27th
Tacoma, Wa. 98407

5-19-03

Michael Collins, U. S. Dept. of Energy
P. O. Box 550 A6-38
Richland, Wa. 99352

Re: Adding 70,000 truckloads of Radioactive Waste to Hanford Dump

- 1 | There are so many reasons why this is not a good idea that it is difficult to comprehend how this plan would even be considered.
Several years ago there were reliable reports of contamination of salmon from leaking, inadequate storage tanks which allowed seepage into the adjacent Columbia River. Adding more chemical and radioactive waste which will be there for thousands of years requires more thought on the part of the U. S. Department of Energy.
 - 2 | Then there is the matter of almost 70,000 truckloads of radioactive waste and chemical waste traveling our highways. This would certainly be an opportunity for terrorists to wreak havoc upon our citizens and highways!!
 - 3 | I believe that radioactive waste and chemical waste should be stored in the State from which it originates, and probably encased in glass.
 - 4 | The waste dump at Hanford must be made safe with proper lining and further dumping must not occur.
 - 5 | Please reconsider and prepare an EIS that protects the Hanford site and that forbids additional dumping from other states.
- Your thoughts concerning the above comments would be appreciated.

Annabelle F. Reed
Annabelle F. Reed
4205 No. 27th
Tacoma, Wa. 98407-5216



PAT BACALA
TRU and LLMW Project Manager

6100 Seagull Ave. NE, Suite 202B
Albuquerque, New Mexico 87122
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bacala@flash.net

May 27, 2003

Mr. Michael S. Collins
HSW EIS Document Manager
Richland Operations Office
U.S. Department of Energy, A6-38
P.O. Box 550
Richland, WA 99352-0550

Subject: Comment on Revised Draft of Hanford Solid Waste (HSW) Environmental Impact Statement (EIS), DOE/EIS-0286D2

Dear Mr. Collins:

This purpose of this letter is to express concern that the preferred alternative for the subject EIS does not specifically address the alternative of thermally treating transuranic (TRU) waste on-site at Hanford, and to recommend that thermal treatment for TRU waste be added to the preferred alternative as a means of removing all prohibited items that prevent the shipment and disposal of TRU waste.

In order to be disposed of at the Waste Isolation Pilot Plant (WIPP) in Carlsbad, New Mexico, TRU waste must meet the shipping requirements specified by the U.S. Nuclear Regulatory Commission (NRC) and the disposal requirements specified in the Waste Analysis Plan (WAP) of the WIPP RCRA Permit. Hanford TRU waste, in many instances, does not meet these requirements for shipping and disposal, as the waste contains items that are prohibited by both the NRC and the WIPP RCRA Permit. Such prohibited items include liquids, aerosol cans, sealed containers, volatile organic compounds, PCBs, corrosives, reactives, ignitables, waste incompatible with the backfill used at WIPP, and waste that generates flammable gas, etc.

The preferred alternative for TRU waste operations in the EIS includes processing capability "such as size-reduction and repackaging technologies." Size-reduction and repackaging technologies will not solve the problem of having prohibited items in TRU waste. Although opening drums and sorting the waste on a table will successfully remove some prohibited items, such as liquids, aerosol cans, and sealed containers, these processes do not remove all prohibited items, and these processes unduly increase the potential for worker exposure to radiation. This TRU waste would still contain many items that would prohibit its shipment and disposal. Hence, without the capability to remove all prohibited items from the TRU waste, a

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large portion of Hanford's TRU waste would remain on-site in storage indefinitely, posing additional risk to workers, the public, and the environment.

Thermal treatment of TRU waste is recommended for inclusion in the preferred alternative because it is a means of removing all (not just some) prohibited items from TRU waste using a process that does not require sorting. There are commercially available thermal treatment processes that have no liquid effluent, and emit only water vapor and carbon dioxide into the air, thus minimizing long-term impacts to the environment by their use at the Hanford Site. Unlike low-level mixed waste (LLMW), TRU waste cannot be transported and treated off-site because of restrictions in the TRU waste Record of Decision; therefore, on-site treatment of TRU waste is the only alternative for this waste stream.

One commercially available thermal treatment process for TRU waste consists of two treatment stages, an in-drum pyrolysis process followed by a steam reforming process. In the first stage, TRU waste is heated in an inert environment to temperatures between 650°C and 750°C. Drums of waste are placed in an electrically heated pyrolysis chamber where water is evaporated, organics are volatilized and pyrolyzed, and corrosives and reactive materials are converted into non-hazardous oxides or carbonate compounds. The pyrolyzed residue in the drums will be an inert, inorganic, carbon char containing radioactive metals.

1

A distinguishing characteristic of this process is that the system greatly minimizes criticality and contamination control issues during the processing of TRU waste. Moderate processing temperatures mitigate radioactive metal volatility, and very low off-gas flows essentially eliminate particulate carryover from the drummed wastes. Back-up protection to prevent radionuclides from becoming airborne is provided by replacing the existing drum lid with a lid that has a ceramic filter and an inorganic drum-to-lid sealing mechanism. The ceramic filter allows gas interchange, but prevents release of radioactive particles.

Stage two of this process is used to treat the off-gases from the pyrolysis process, and consists of a steam reformer and a downstream scrubber for neutralization of acid gases. The off-gas produced by pyrolysis consists of water vapor, volatilized organics, and acid gases from the decomposition of cellulosic materials (i.e., paper, wipes, anti-contamination clothing, etc.), plastics, and other organics in the drums. The off-gas from the pyrolysis chamber is pulled by vacuum into the bottom of a steam reformer. The steam reforming process destroys residual organics in the off-gas, including RCRA and TSCA organic constituents. These organics are converted to carbon dioxide and water vapor in the steam reformer by a combination of steam reforming and oxidizing reactions.

Downstream of the steam reformer, wet scrubber technology is used to neutralize corrosive acid gases and particulates that are carried out of the reforming vessel with the off-gas. Scrubber liquids are concentrated, emptied into a 55-gallon drum, and then dried in the pyrolyzer; thus, the process produces no secondary liquid waste. Downstream of the scrubber, the off-gases are passed through a HEPA filter so that the emissions released to the atmosphere are carbon dioxide and water vapor. The system does not generate dioxins or furans, and is considered a non-incineration process by the U.S. Environmental Protection Agency (EPA). Pyrolysis and steam reforming processes are both recommended by the Secretary of Energy's Advisory Panel on Alternatives to Incineration (Blue Ribbon Panel).

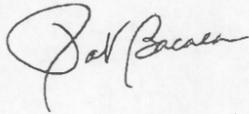
The same system could be used for the treatment of both TRU waste and LLMW. The treated TRU waste would meet all NRC requirements for shipping and WIPP RCRA Permit

1

requirements for disposal. Treatment of LLMW would remove all organics, including RCRA organics and TSCA PCBs. If the LLMW contained heavy metals, the treated residue would undergo secondary treatment (e.g., macroencapsulation or microencapsulation). The treated waste would then meet Land Disposal Restrictions. This one treatment process can accelerate the disposal of both LLMW and TRU waste. Having one process, instead of separate processes for LLMW and TRU waste, would minimize the short-term environmental impacts due to construction.

Thermal treatment of TRU and LLMW on-site waste would also reduce transportation risks. After treatment, TRU waste will not contain any untreated hazardous constituents, and the volume of the waste will have been reduced by thermal treatment (depending on the contents of the debris in the waste, documented volume reduction ranges from 20–90%). After pyrolysis, drums of debris waste will be compacted as part of the thermal treatment process, yielding a significant reduction in the number of TRU waste shipments from Hanford to WIPP in New Mexico. If the same thermal treatment system is used for LLMW, the transportation risks associated with the treatment of this waste stream are also reduced because LLMW would not have to be shipped off-site for treatment.

Sincerely yours,



Laura Applegate
PO Box 352
Trout Lake, WA
98650

Michael Collins
U.S. Department of Energy
P.O. Box 550, A6-38
Richland, WA 99352

Hello Michael! I am speaking for the Columbia River through this letter, an entity that has not been given much voice in the past century. All my life I have lived on tributaries of this river, swam in its waters, irrigated my pastures with its flow, and enjoyed the amazing wildlife and endemics that exist in its channel.

- 1 My friends and I represent the masses who depend on this river for our livelihoods and our very lives. The tragedy of contaminated groundwater and the high cancer rate of downwinders cannot be an element of the past, until the increased dumping is stopped in the present.
- 2 We will not accept the federal government's blatant disregard for the desires and laws of Washington State! Please do not offload more waste on us in a time when our salmon populations are in desperate need of stability in the Hanford Reach. Please don't send us these lethal chemicals in a time when our state population and development is on the rise.
- 3
- 4 The eastern Washington shrub-steppe is a complex ecosystem, not a wasteland, and we don't want your waste. Eastern Washington is an agricultural mecca, dependent entirely on the Columbia, not a filter for your plutonium. It does not take a scientist to realize such toxic waste should be stored away from a major waterway, so find someplace else for it, (excluding fertilizers, cement, road deicers, and bombs)!!!

Thanks! Laura Applegate

Kj McInyee *Laura M Applegate* *Joy Osbr*
Ryan Santner *Marki Weil*
Sharon M. Keavelon *Arthur M. Shelley*
David Little *Isaac B. Daniel*
Dyvin *Marco*
Vake Feather *Br...*
Brett Stevenson *Meredean Jackson*
Michaela Dunasky *Erwin James*

Additional signatures were assigned document numbers LM-0005 through LM-0016 (3 signatures were illegible and no document numbers were assigned).

L-0033

Bob Aegerter

9230 41st Avenue NE
Seattle WA 98115-3802
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<http://www.speakeasy.org/~boba>

May 22, 2003

Mr. Michael Collins
NEPA Document Manager
United States Department of Energy
Richland Operations Office
Post Office Box 55 MSIN A6-38
Richland WA 99352

Re: Revised Draft
Hanford Site Radioactive and Hazardous Solid Waste Program
Environmental Impact Statement

Dear Mr. Collins;

1 | I am concerned that an accumulative impact of bringing more waste onto the Hanford Site will slow the cleanup process and will add to the environmental burden on our groundwater and the Columbia River. This EIS must be revised to fully evaluate and share with the public these important issues. I expected from this draft EIS:

- 2 | 1) a disclosure of impacts of past and continued waste disposal at Hanford (The Existing Condition);
- 3 | 2) comparison of the environmental impacts of radioactive and hazardous waste disposal at different sites; a discussion of the long-term management of this serious threat to human health and the environment;
- 4 | 3) and the characterization of all previously buried and newly-generated solid waste at the Hanford Reservation..

This draft is inadequate in its response to these crucial issues.

5 | 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.

6 | Revise the analysis to state the contamination to the soil at the edge of the storage trenches I just paid my monthly solid waste utility bill. It is high. That is because of past mistakes and the need to place waste in lined pits. Low level wastes should be stored in at least the same

When are the People on this little Ball of dirt going to realize that this is the only Home we have?

L-0033 (contd)

7 | way as common household garbage: line the trenches, install legal groundwater monitoring
8 & 9 | and leachate collection, and install a weatherproof cap.

10 | This EIS does not adequately address the problems of mixed waste such as carbon tetrachloride solvent in the waste stream. These volatile carcinogenic compounds represent a serious health risk to future workers. Full disclosure of the future problems of opening these trenches is required in an adequate EIS.

11 | DOE has a legal responsibility to treat contaminated soils at Hanford by 2018, but proposes to bury waste in unlined trenches through at least 2046. Once again, your credibility is suspect.

12 | For 45 years beginning in 1943 the DOE and its predecessors made unwise and dangerous decisions about the temporary storage of waste. I have seen examples of the records. They are deplorable. The risk to public health and the environment continues to grow. For the last 35 years DOE has attempted to clean up this mess, but poor management, shifting priorities, incompetent contractors and the lack of political will have resulted in inadequate results. It will be an additional 35 years before significant results are complete. Such a dismal record will be a long remembered blight on our generation. We can and must do better.

Sincerely,



Bob Aegerter

When are the People on this little Ball of dirt going to realize that this is the only Home we have?