



VIA FACSIMILE AND FIRST-CLASS MAIL

June 11, 2003

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

**Re: U.S. Department of Energy's Revised Draft Hanford Site Solid Waste Program Environmental Impact Statement**

Dear Mr. Collins:

Friends of the Columbia Gorge has reviewed and would like to comment on the above-referenced environmental impact statement. Friends is a non-profit organization with members in more than 3,000 households dedicated to protecting and enhancing the resources of the Columbia River Gorge through the effective implementation of the Columbia River Gorge National Scenic Area Act and other laws. Our membership includes hundreds of citizens who reside in the six counties within the Columbia River Gorge National Scenic Area.

The U.S. Department of Energy's (USDOE) proposal to double the amount of radioactive waste buried at Hanford presents a grave threat of radioactive contamination to the Columbia River and all of the land adjacent to it including the National Scenic Area. Because the waste will likely be stored in unlined disposal pits, the risk of more soil and groundwater contamination is greatly increased.

**1** The *Revised Draft Solid Waste Environmental Impact Statement* (EIS) fails to adequately address the human health and environmental impacts of shipping additional waste to Hanford. Because the DOE has not yet cleaned up the existing radioactive contamination at Hanford, additional radioactive waste should not be sent to Hanford. The EIS must address the cumulative impacts of shipping more waste to the Hanford site. A cumulative impacts analysis must consider the past, present, and likely future efforts to control the contamination at Hanford. In addition, the analysis should address the following issues:

- The EIS must consider the long half-life of radio-nuclides such as iodine-129, which are stored in large quantities at Hanford. The DOE must complete the inventory and

classification of these wastes before it can assess the impacts of shipping and storing additional waste at Hanford.

- The EIS must consider the impacts additional hazardous waste might have on water quality in the immediate vicinity of Hanford Reach. The latest EIS masks the impact of ground and surface water contamination by only considering water quality miles downriver from Hanford.
- The EIS fails to adequately address risks to all communities along transportation routes, specifically the risks from dangerous "transuranic wastes."
- The EIS fails to provide a timeline that states specific deadlines for the lining of hazardous waste dumpsites and contaminated areas. These sites must be lined immediately.
- The no-action alternative must not use as a baseline comparison the notion that all on-site mitigation will cease if the proposed alternatives are not implemented. Such a notion creates a false choice between cleanup and no cleanup.

Because the multi-billion-dollar effort to clean up the Hanford waste site is not complete, the DOE's plan to ship additional waste to the site will undermine current cleanup efforts and drain scarce budgetary resources from the currently inadequate cleanup fund. The *Solid Waste Environmental Impact Statement* is still not responsive to citizen concerns and does not effectively analyze all alternatives.

Please add Friends' comments to the administrative record for this proposal. In addition, Friends respectfully requests an acknowledgment from DOE that our comments have been received and considered. Thank you for this opportunity to comment.

Sincerely,



Glenn Fullilove  
Land Use Legal Assistant

L-0047

June 6, 2003

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

Dear Mr. Collins:

I think it is very dangerous for the D.O.E to bring in any more plutonium waste to Hanford.

1 Other sites should be surveyed and evaluated before a decision is made. There are better locations where pits are lined with concrete to prevent waste from leaching into the ground. There is too much danger of leakage into the Columbia River at Hanford.

I hereby register my opposition to any more waste going to Hanford.

Sincerely,

Claire Jones

356 N. 190th St. #203-B

Shoreline, WA 98133-3856

OREGON HANFORD CLEANUP BOARD

Shelley Cimon, Chair

Casey Beard, Vice Chair

Larry Clucas

Norm Dyer

Norma Jean Getmond

Barbara Jarvis

Paige Knight

Eric Nisley

Marc Rogelstad

Paul R. Clency  
Water Resources  
Department

Armand Minthorn  
Confederated Tribes of  
the Umatilla Indian  
Reservation

Michael Grainey  
Oregon Office of Energy

Sen. Ted Ferrioli

Sen. David Nelson

Rep. Linda Flores

Rep. Bob Jenson

Rep. Steve March

June 11, 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

Re: Hanford Solid Waste Environmental Impact Statement  
HSW-EIS

Dear Mr. Collins:

1

The Oregon Hanford Cleanup Board (Board) appreciates the opportunity to comment on the Revised Draft Hanford Solid Waste EIS (revised EIS). Thank you for recognizing the significant interest of Oregon citizens in Hanford issues. We also appreciate the 15-day extension of the comment period, as requested by Oregon Senators Ron Wyden and Gordon Smith and by the Oregon Department of Energy.

2

The Board has discussed the revised EIS and has serious concerns about the adequacy and thoroughness of the document. Our comments follow.

3

1 The revised EIS claims that groundwater beneath the Hanford site may be considered irreversibly and irretrievably contaminated – in effect, written off entirely. Protecting the groundwater underlying the Hanford site is of particular interest to the Board in that this is the best way to protect the Columbia River. Declaring that nothing can or will be done to clean up the groundwater contamination would result in unregulated contamination of the Columbia River. This is totally unacceptable to the Board.

phone 503.378.4040 800.221.8035 In Oregon fax 503.373.7806

625 Marion Street, N.E., Suite 1, Salem, Oregon 97301-3742  
www.energy.state.or.us/nucsafef/hwboard.htm

OREGON HANFORD CLEANUP BOARD

- 4** 2 Further, the revised EIS proposes to re-contaminate the groundwater as new burial sites are developed and the disposed waste begins to leach contaminants into the groundwater. The risks associated with recontamination resulting from future disposal of large amounts of radioactive and chemical contaminants have not been adequately analyzed.
- 5** 3 The point at which the U.S. Department of Energy (DOE) analyzed risk due to disposal sites was too far away to sufficiently and fully determine release impacts. The Board finds DOE's explanation that these are lines of analyses, not compliance points, to be inadequate. Monitoring points must be established at the disposal site boundaries.
- 6** 4 The revised EIS does not account for all waste at Hanford, and thus does not fully analyze the cumulative impacts of past or future waste disposal activities. In order to support a Record of Decision the revised EIS must – at a minimum – include the entire existing and proposed waste inventory.
- 7** 5 We still have some issues with the adequacy of the analyses of the transportation impacts. We believe that route-specific factors should be considered, which would recognize the severe winter weather conditions that frequently exist along major portions of the Oregon route.
- 8** 6 The revised EIS should include an analysis of the threat to endangered and threatened species in the area and fully evaluate the ecological impacts of the actions proposed by DOE.
- 9** 7 The Board is troubled that all scenarios show unacceptable future risk to Native Americans. While we agree that it is virtually impossible to accurately predict impacts 10,000 years in the future, the fact that DOE's own analyses show detrimental impacts should lead DOE to reconsider its proposed actions.
- 10** In summary, the Board believes that the revised EIS is based on incomplete and inadequate data. We are concerned that, lacking this data, DOE's proposed actions could result in devastating environmental damage to the area, and in particular, to the Columbia River. As a result, we urge DOE to hold off on issuing a final Record of Decision until these analyses can be completed. In addition, given

phone 503.378.4040 800.221.8035 in Oregon fax 503.373.7806

625 Marlon Street, N.E., Suite 1, Salem, Oregon 97301-3742  
[www.energy.state.or.us/hucsafe/hwboard.htm](http://www.energy.state.or.us/hucsafe/hwboard.htm)

OREGON HANFORD CLEANUP BOARD

11

that elements of the upcoming Tanks Closure EIS will also contribute to the waste disposed and left at Hanford, the two EIS's should be issued concurrently, with an expanded public comment period.

Sincerely,



Shelley Cimon, Chair  
Oregon Hanford Cleanup Board

Cc: Oregon Governor Ted Kulongoski  
Mike Wilson, Washington Department of Ecology  
Nick Ceto, U.S. Environmental Protection Agency  
Armand Minthorn, Confederated Tribes of the Umatilla  
Indian Reservation  
Russell Jim, Yakama Indian Nation  
Patrick Sobotta, Nez Perce Tribe  
Todd Martin, Chair, Hanford Advisory Board  
U.S. Senator Gordon H. Smith  
U.S. Senator Ron Wyden  
U.S. Representative David Wu  
U.S. Representative Greg Walden  
U.S. Representative Peter DeFazio  
U.S. Representative Darlene Hooley  
U.S. Representative Earl Blumenauer

---

phone 503.378.4040 800.221.8035 in Oregon fax 503.378.7806

625 Marion Street, N.E., Suite 1, Salem, Oregon 97301-3742  
[www.energy.state.or.us/hucsafe/hwboard.htm](http://www.energy.state.or.us/hucsafe/hwboard.htm)