Heart of America Northwest
"Leading the fight for Hanford Clean-Up"
for 15 years

Mr. Michael Collins
HSW EIS Document Manager
Richland Operations Office
US Department of Energy, A6-38
PO Box 550
Richland, WA 99352-0550

June 10, 2003

Dear Mr. Collins,

Enclosed are attachments to Heart of America Northwest's comments to the Revised Draft Hanford Site Solid Waste Program Environmental Impact Statement. Comments will be sent to you via e-mail and by hard copy.

If you have any questions, please feel free to call us at (206) 382-1014. Thank you for your time.

Best wishes,

Hyun S. Lee

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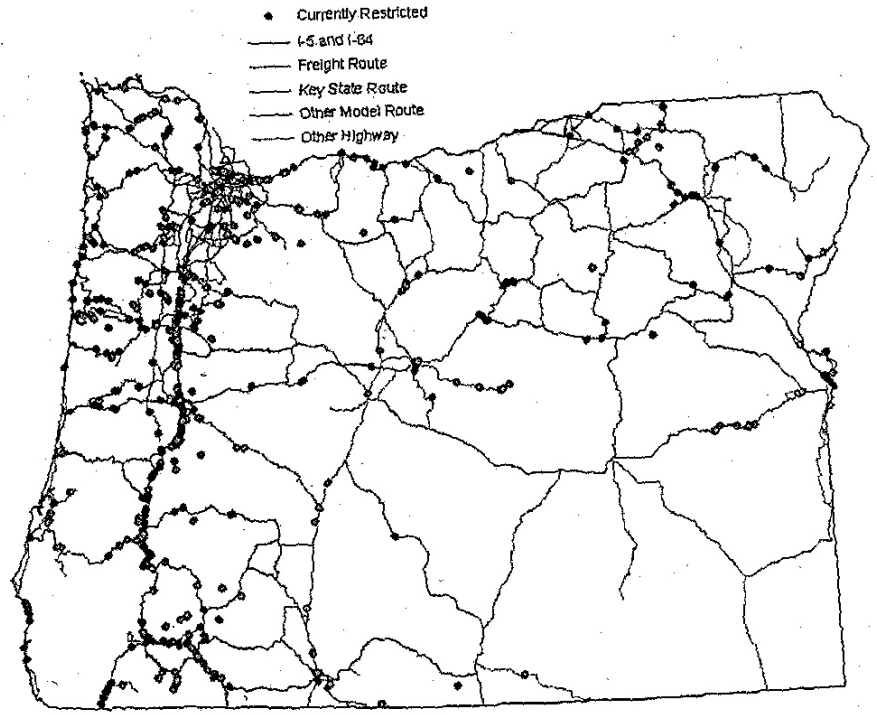
Gerald M. Pollet, JD, Executive Director

Heart of America Northwest

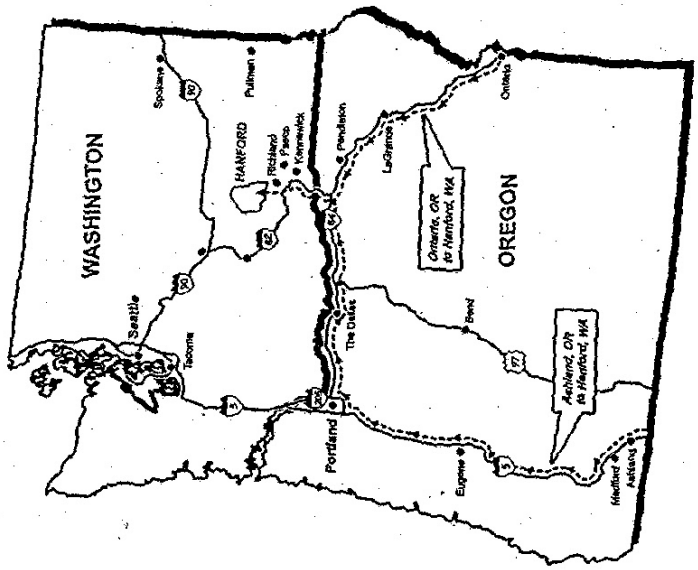
USDOE failed to consider the perilous state of Oregon's bridges before shipping radioactive waste to Hanford

Endangering small communities along the trucking routes

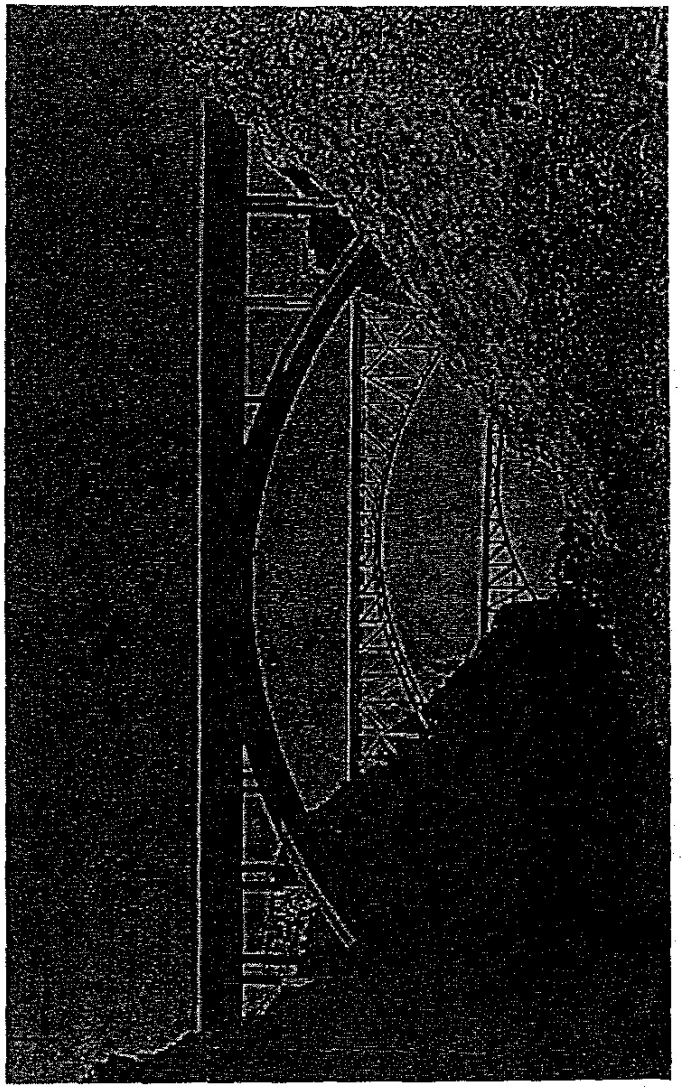
Figure D-12. Roadway Network Included in the Statewide Model, with Currently Restricted and Cracked Bridges.



USDOE plans on shipping wastes to Hanford through Oregon on Interstate-5 and Interstate-84



Highly radioactive TRU waste would be shipped over some of Oregon's decaying bridges



Investigations by the State of Oregon have identified 221 "critical problem bridges" on I-5 and I-84 that shipments will pass through

DRAFT

OREGON DEPARTMENT OF TRANSPORTION

ECONOMIC AND BRIDGE OPTIONS REPORT

A REPORT TO THE
OREGON TRANSPORTATION COMMISSION

PREPARED BY THE ECONOMIC & BRIDGE OPTIONS TEAM
JANUARY 15, 2003

The Oregon Department of Transportation has concluded that bridges throughout the state on I-5 and I-84 are currently cracked and/or restricted

"Based on the permits granted, the truck shipments from ETEC and the truck from BCL in Ohio were directed to use secondary roads and detour off the the Interstate Highway."

- Declaration of Ken Niles, Administrator, Nuclear Safety Division, Oregon Office of Energy (May 1, 2003)

Additional TRU wastes could be detoured off I-84

- "Detours off Interstate 84 may be necessary for future shipments of BCL TRU wastes, or other TRU wastes from other sites, due to weight restrictions or bridge construction."
- -Declaration of Ken Niles, Administrator Nuclear Safety Division, Oregon Office of Energy (May 1, 2003)

"Neither USDOE nor the contractor carrier fully considered the overweight status of the truck shipments and the routes that would be used."

- Declaration of Ken Niles, Administrator, Nuclear Safety Division, Oregon Office of Energy (May 1, 2003)

Bridge restrictions could impact communities along the shipping routes

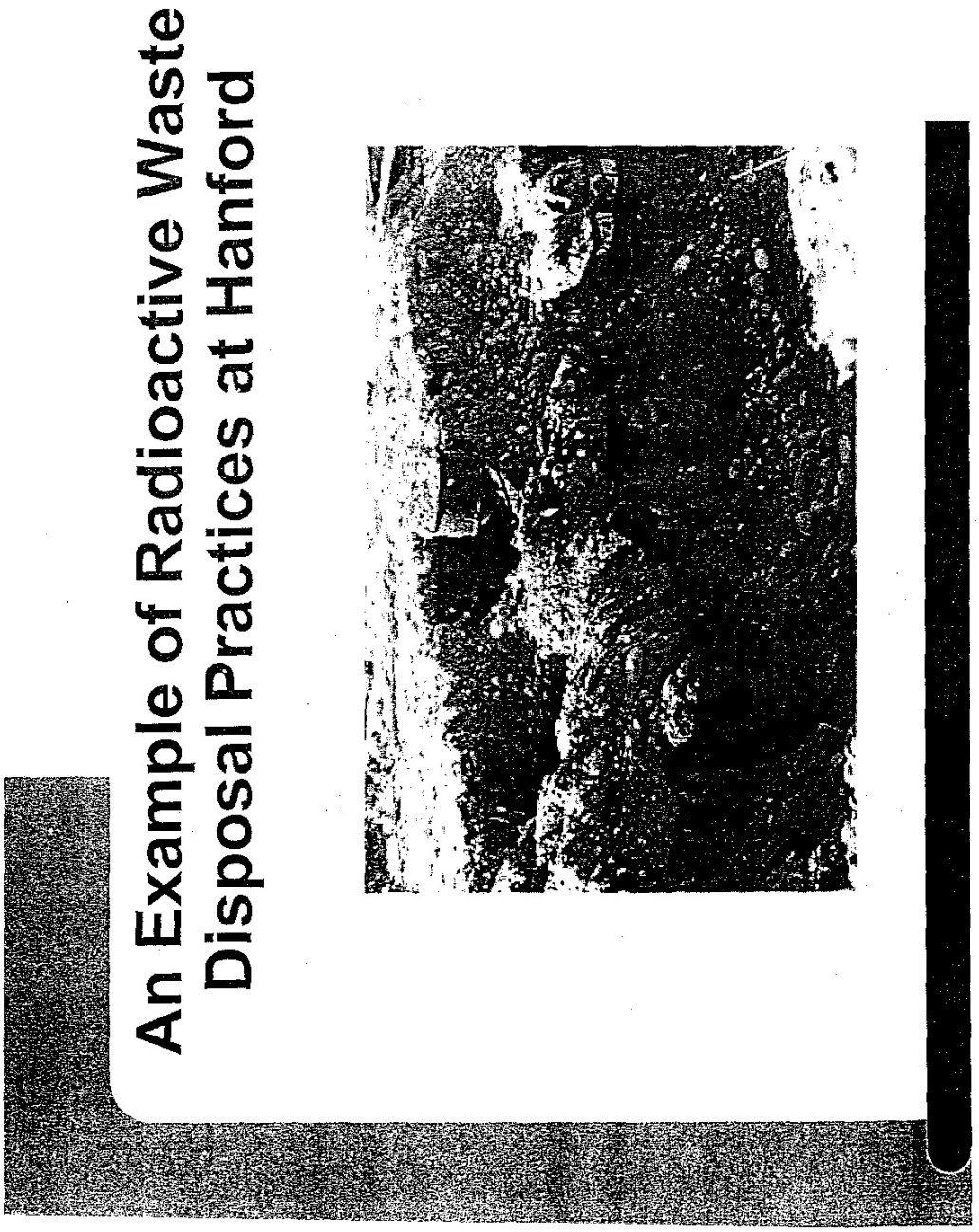
- Could result in as many as 1,800 detoured trucks (SW Oregon Case Study: Riddle)
- Could result in community safety concerns
- Could result in damage to city streets
- Could negatively impact local commerce

Bridge restrictions could impact communities along the shipping routes

- Traffic could be detoured 100-200 miles
- Highway truck traffic could be detoured down main streets of small towns
- Parking could be restricted
- School buses could be rerouted

USDOE Plans Call for More than Doubling The Total Amount of "Low-Level Waste" Already Buried in Hanford's Soil -- By Importing Waste

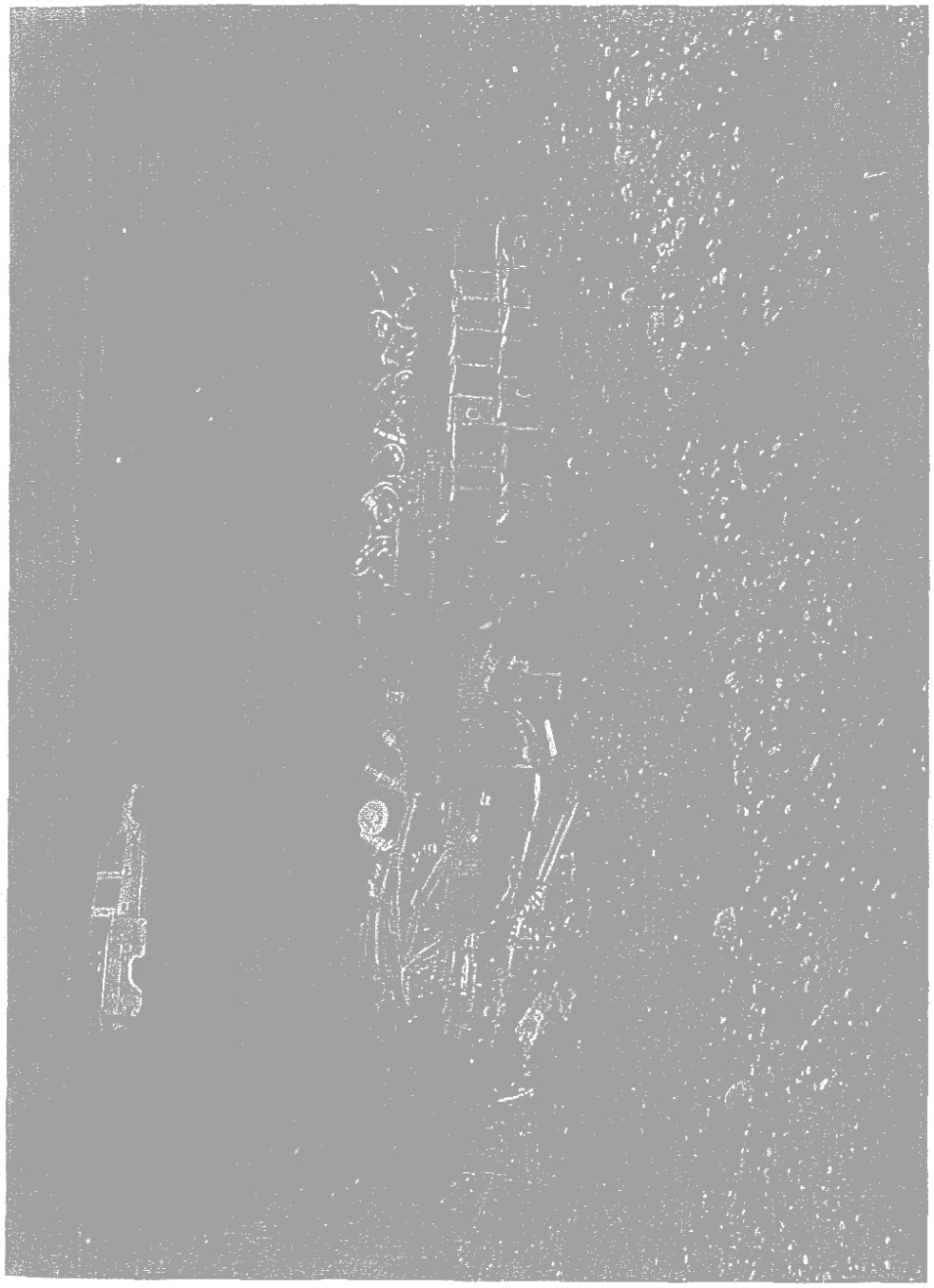
- Plan Calls for Massive Import of Radioactive Wastes from other Nuclear Weapons Plants, Labs, even private companies;
- USDOE dumps LLW in unlined soil ditches
- Even our kitchen garbage can not legally be dumped in unlined soil ditches in Washington
- No Knowledge of total cumulative risk from waste already in Hanford's soil


An Example of Radioactive Waste
Disposal Practices at Hanford

200,000+ cubic feet of offsite waste annually dumped in unlined burial grounds

- FY 2000 USDOE dumped 232,345 cubic feet of radioactive waste from offsite in unlined burial grounds
- enough to cover a football field 13 feet deep in radioactive waste

L-0053 (contd)



Mixed RH-TRU probably into unlined, soil Low-Level Burial Grounds (LLBG):

- The LLBG are illegal hazardous waste disposal landfills that are grossly out of compliance with Washington State standards (i.e., liner and leachate collection requirements, groundwater monitoring....)
- carcinogen Carbon Tetrachloride was measured in air samples from the trenches in Waste Management Unit 4 (the same portion of the LLBG that USDOE proposes to store offsite TRU in) at levels reaching 176 times the OSHA standard for worker exposure.
  - The maximum air sample from Trench Four was 63% of the LD/LC50 – the level at which 50% of rats exposed were killed.

Ecology Has Determined that TRU Stored in Unlined Burial Grounds in WMA 4 is the likely source of highly dangerous, spreading Carbon Tetrachloride

- "Certain TRU containers are designed to vent…"
- "known inventories of organics (including carbon tetrachloride, xylene, toluene, trichlorethylene…"
  - Evology to USDOE Notice of Deficiency Sec. 5.3.3.2

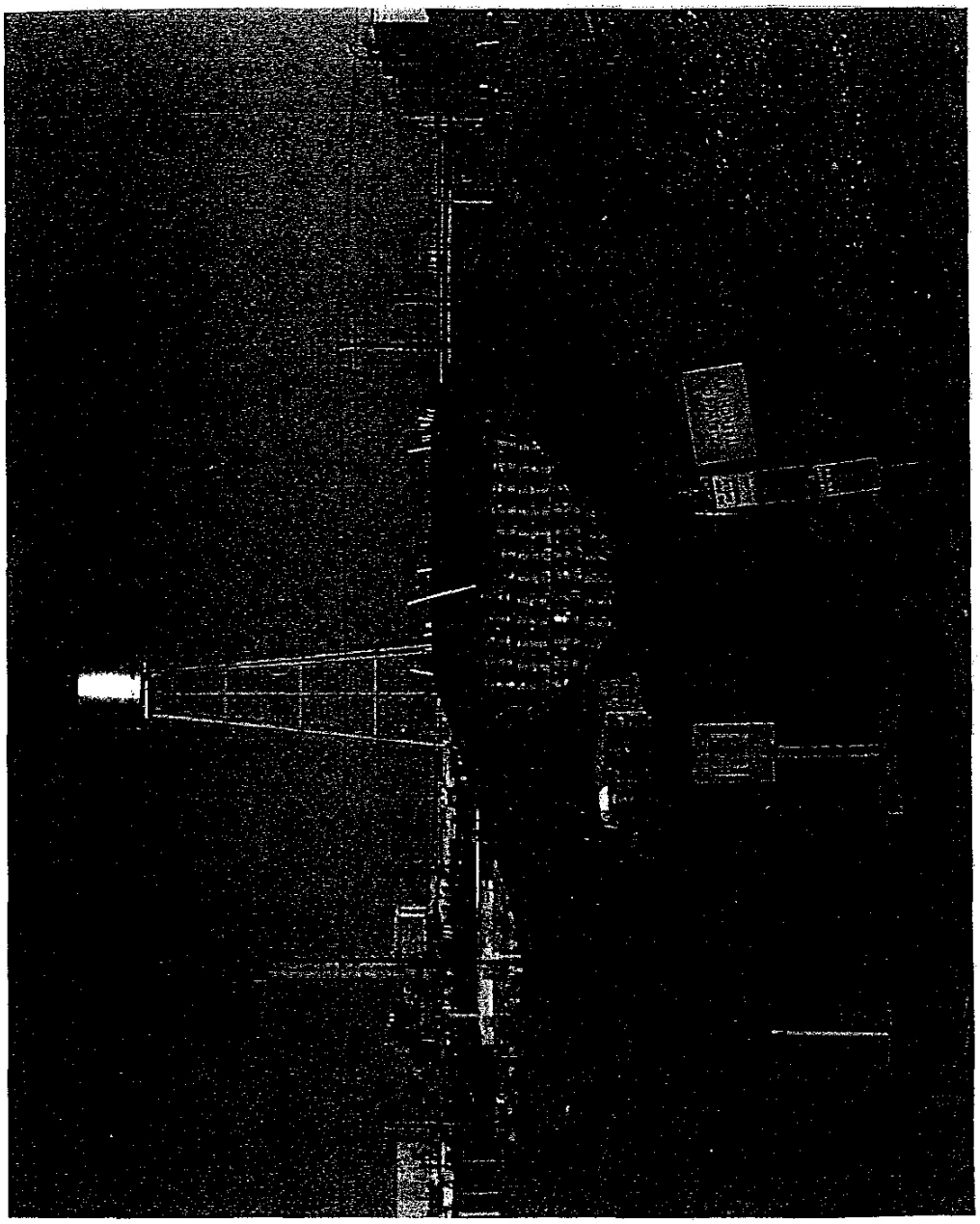
Ecology has found that hazardous waste is being released from WMA 4 Burial Ground

- Yet, Ecology still processing OPERATION permit for Low-Level Burial Grounds;
- "considerable evidence that shows waste constituent releases from the LLWMA4"
  - Ecology NOD letter P. 5 of 15; deficiency comment #19.
- Vapor pathway likely accelerating spread of other hazardous wastes:

Excerpts from Washington State Department of Ecology's Administrative Order (issued 4/30/2003 [page])

- DOE states that "solid radioactive and hazardous waste remain underground in deteriorating containers that have exceeded their design life causing soil and eventual groundwater contamination." [5]

- Ecology finds that the wastes stored in DOE burial grounds 218-E-12B, 218-W-3A, 218-W-4B, and 218-W-4C pose a potential threat to human health and the environment due to hazardous constituents and transuranic elements known to have been stored there, the manner in which these RSW (retrievably stored waste) wastes are stored, and known and threatened spills and releases from said containers." [7]



SEATTLE POST-INTELLIGENCER | TUESDAY, MAY 13, 2003

Waste deliveries to Hanford halted

Judge issues temporary ban on out-of-state radioactive shipments

THE ASSOCIATED PRESS

YAKIMA – A federal judge yesterday temporarily barred the U.S. Department of Energy from sending highly radioactive trash from out of state to the Hanford Nuclear Reservation.

The order is in effect until there is a resolution of the lawsuit filed by the state of Washington against the Energy Department in an ongoing dispute over cleaning up radioactive waste at Hanford.

"Every day spent in court is taking attention away from actual cleanup at Hanford," said Joe Davis, a spokesman for the Energy Department in Washington, D.C.

Gov. Gary Locke said he was pleased that U.S. District Judge Alan McDonald had decided to prevent future shipments of radioactive waste to Hanford until the state's lawsuit is decided.

"There are approximately 75,000 barrels of waste buried in unlined trenches at Hanford that need to be cleaned up. It is critically important that we not make the problem worse by bringing in more shipments from other states," Locke said.

The Energy Department's plan is to truck transuranic waste – plutonium-contaminated rags, tools and other discarded items – from other sites for inspection and repacking at Hanford before shipping the barrels off to New Mexico's Waste Isolation Pilot Plant. Transuranic waste is highly radioactive and can take thousands of years or more to decay to safe levels.

The state contends that under the National Environmental Policy Act of 1969, the Energy Department is required to do more study and have more public involvement before such a decision can be made.

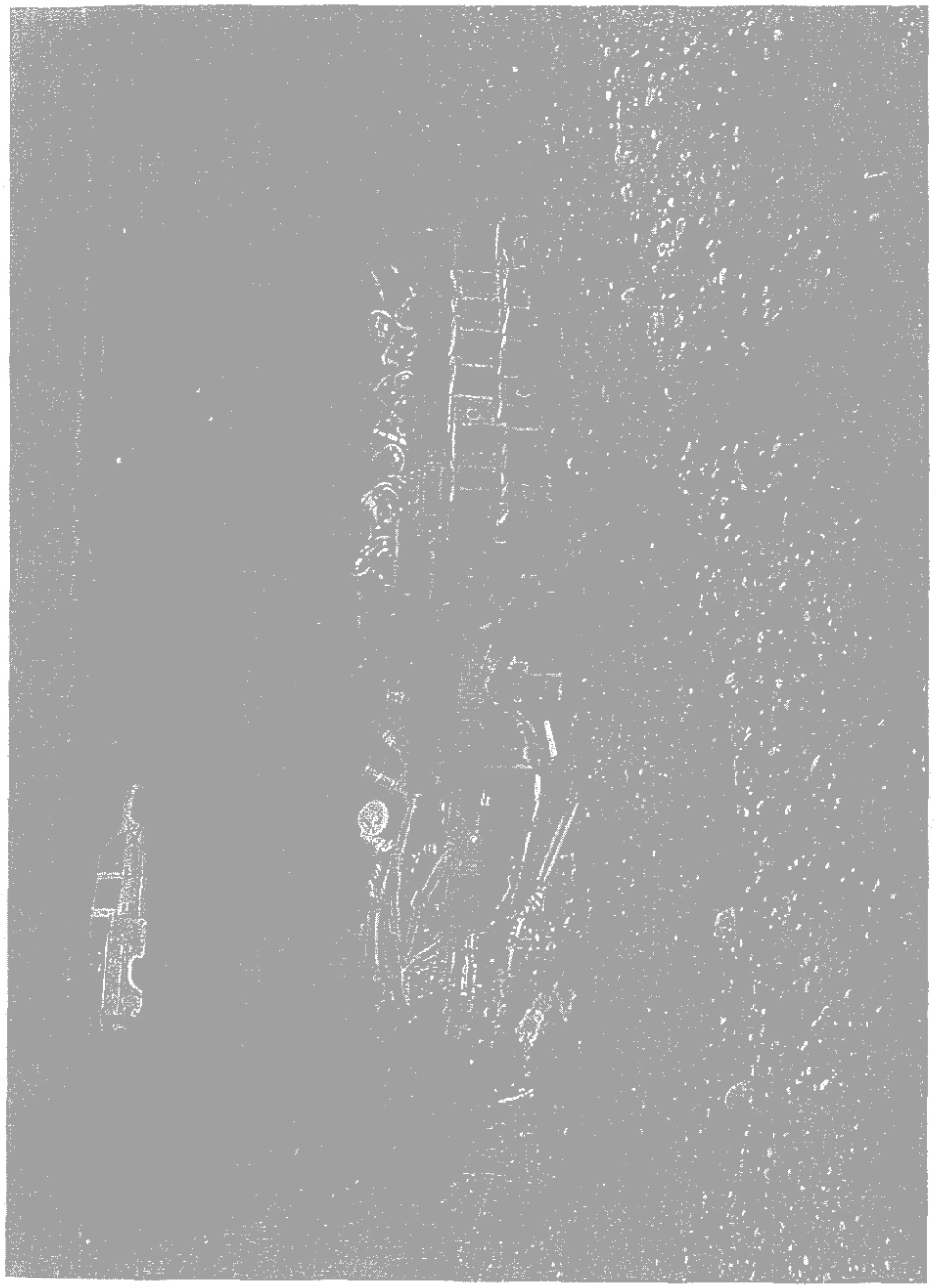
The state sued the Energy Department in March after talks broke down over setting specific written plans and deadlines for ensuring that both the transuranic waste already buried at Hanford and the imported waste would move on to New Mexico.

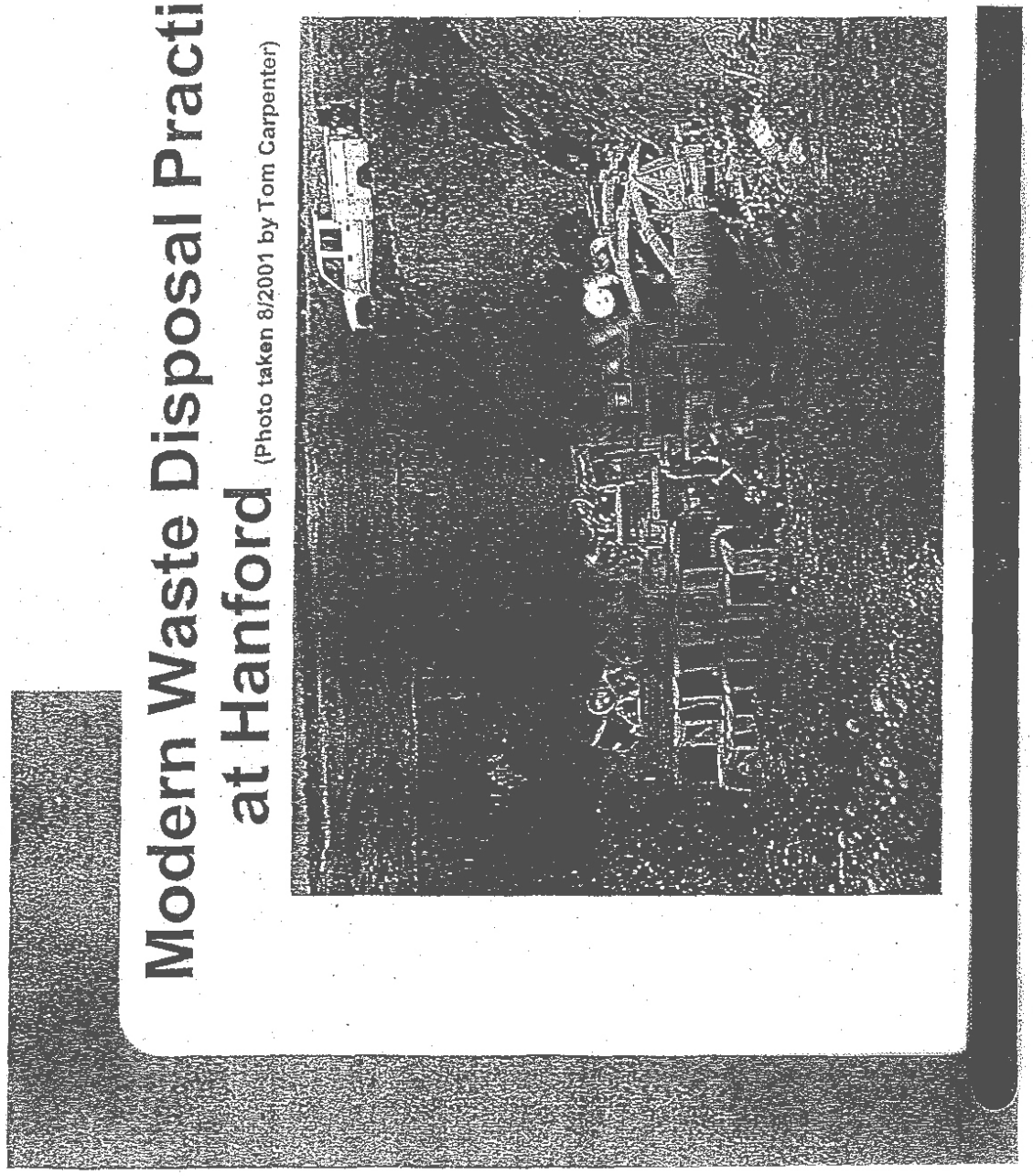
- USDOE is adding additional TRU with organic and other hazardous wastes (including carbon tetrachloride) to the same burial ground area where carbon tetrachloride is spreading; and, new TRU may also vent CCl4

- Carbon Tetrachloride vapor level measure at 176% of lowest published fatal concentration in humans;

- Imminent and substantial hazard to workers

L-0053 (contd)




Modern Waste Disposal Practices
at Hanford
(Photo taken 8/2001 by Tom Carpenter)