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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:

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.

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

- 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.

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- 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.
- 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.
- 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.
- 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.
- 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.
- 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.

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

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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