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April 29, 2010

The Honorable Steven Chu
Secretary of Energy,
U.S. Department of Energy
1000 Independence Ave., SW
Washington D.C. 20585

The Honorable Inés Triay
Assistant Secretary for Environmental Management
U.S. Department of Energy
1000 Independence Ave., SW
Washington D.C. 20585

RE: End Waste Import/Storage Mission at Hanford

Dear Secretary Chu and Assistant Secretary Triay:

On behalf of the undersigned organizations, we are writing to request that the U.S. Department of Energy (DOE) withdraw its 2000 and 2004 Records of Decision selecting Hanford as a disposal site for large volumes of radioactive low-level waste (LLW) and mixed low-level waste (MLLW) from across the Nation. The Department's own draft *Tank Closure and Waste Management Environmental Impact Statement* (TC&WM EIS) clearly demonstrates that importing and burying off-site waste at Hanford poses serious human health and environmental impacts.

We join the State of Oregon Department of Energy's formal request, submitted to the Department on March 23, 2010. Oregon's letter discusses both the impacts and the flawed process relied upon by DOE in issuing a Record of Decision before analyzing the impacts at Hanford from importing and disposing of off-site waste.

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Against this backdrop, we urge DOE to:

- a) withdraw its prior decisions selecting Hanford to dispose of off-site waste;
- b) issue a new formal decision that DOE will not add more waste to Hanford;
- c) commit that DOE will conduct a new environmental impact statement if DOE revisits this decision after 2022; and
- c) commit to issuing a new, revised draft of the TC&WM EIS for public comment which does not propose adding off-site waste and cures the numerous defects in the current draft, as the Department was advised by its Hanford Advisory Board (March 4, 2010).

The Department's claims that it prioritizes cleanup of Hanford and will honor a voluntary moratorium on disposing of off-site waste at Hanford until the vitrification plant is operational (estimated for 2022) have no credibility so long as the Department continues to insist that the TC&WM EIS include disposal at Hanford for 3 million cubic feet of off-site waste. The promised moratorium on adding off-site waste until 2022 does nothing to diminish the severe impacts to groundwater, the Columbia River, and human health projected by DOE itself in the draft TC&WM EIS. The Department's insistence that it will implement its decision made in 2000 to add that waste – prior to any site specific impact analysis – does, however, greatly diminish the Department of Energy's credibility.

Thousands of citizens have sent in comments on the TC&WM EIS objecting to the Department's insistence that it will use Hanford to dispose of off-site waste, and hundreds turned out at the public hearings held in Washington and Oregon. The people of the Northwest, including many of the members of our organizations, responded to the analysis put forth by the Department in the TC&WM EIS with unified objections to disposing of off-site waste at Hanford.

The latest information, disclosed to the public in the TC&WM EIS, confirms that the assumptions underlying DOE's 2000 decision have not withstood the test of time. As the Oregon Department of Energy stated in its letter:

Potential site-specific impacts [of importing LLW and MLLW] were finally assessed and documented with the release late last year of the draft Hanford Tank Closure Waste Management Environmental Impact Statement (TC&WM EIS). This document clearly shows that the adverse impacts of disposing of additional off-site waste at Hanford, especially if it contains certain mobile and long-lived radionuclides, would be significant. The analysis in the draft TC&WM EIS shows that no matter where at Hanford DOE proposes to dispose of off-site waste, the impacts exceed standards and are unacceptable. Moreover, the impacts from Hanford-origin wastes in these same areas already exceed standards under the most aggressive cleanup considered, leaving no room for any additional impact from off-site wastes.

The Hanford Advisory Board also issued formal consensus advice to the Department urging DOE to issue a formal Record of Decision that DOE will not add off-site waste to Hanford, stating, in part:

Importation of this waste is projected in the draft TC&WMEIS to increase the contamination levels in groundwater by as much as tenfold above the impacts projected for key contaminants of concern for on-site waste. It could reach a cancer risk level for groundwater in excess of one hundred times Washington State's cleanup risk level for cleanups and landfills.

The draft TC & WM EIS does not include a reasonable alternative to adding more waste to Hanford . . . The draft document clearly shows both alternatives (for where DOE would dispose of off-site waste) analyzed by DOE have contaminants above legal standards due to quantities and composition of the projected wastes disposed. DOE should have and did not consider an alternative that did not import waste for disposal at Hanford.¹

The Department's draft TC&WM EIS fails to consider and disclose the route specific impacts from trucking 3 million cubic feet of waste to be disposed at Hanford, and fails to meet the legal requirement under the National Environmental Policy Act to disclose to the public that the Department has a pending related proposal to import and dispose of highly radioactive "GTCC" wastes at Hanford – which would greatly increase the cumulative environmental and health impacts. The Department's failure to disclose these plans in TC&WM EIS and in materials discussing the EIS has greatly harmed the Department's credibility, and increased public resolve to oppose the Department's plans to import and dispose of more waste at Hanford.

As evidenced by the overwhelming public outcry at the TC&WM EIS hearings, citizens of the Pacific Northwest will not tolerate off-site waste exacerbating Hanford's existing threats to the Columbia River and people of the Northwest. The Department faces certain litigation if it does not withdraw its decision to use Hanford as a national radioactive waste dump.

In light of these serious issues, we urge the Department to remove consideration of off-site waste in the draft TC&WM EIS and to issue a Record of Decision that off-site waste will *not* be added to Hanford.

Sincerely,



Brett VandenHeuvel
Executive Director
Columbia Riverkeeper



Gerry Pollet
Executive Director
Heart of America Northwest

Sierra Club Cascade Chapter

Oregon Sierra Club

¹ Hanford Advisory Board (HAB) Advice 229, March 4, 2010, Page 11 (parenthetical added).

Spokane Riverkeeper

Republicans for Environmental Protection, Washington Chapter

Northwest Environmental Defense Center

Friends of the Columbia Gorge

The Lands Council

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Washington Physicians for Social Responsibility

Oregon Physicians for Social Responsibility

Olympic Environmental Council

Silver Valley Community Resource Center

CC: Governor Chris Gregoire
Governor Ted Kulongoski
Senator Patty Murray
Senator Maria Cantwell
Senator Ron Wyden
Senator Jeff Merkley