

## **Attachment 1: DETAILED COMMENTS**

The HAB requests specific responses to each comment.

### **TOPIC ONE: Actions, alternatives and impacts for all Hanford waste sites.**

1. Scope should include a roadmap to locate actions, alternatives and impacts for all identified waste sites on the Central Plateau.
2. Disposition alternatives for the Fast Flux Test Facility (FFTF), Plutonium Reaction Test Reactor (PRTR) and N Reactor should be included in a separate, self-standing EIS which should also update actions, alternatives and impacts for the eight production reactors (B, C, D, DR, F, H, KE, and KW.) The cumulative impact of all 11 reactors should be included in the TC&WM EIS.
3. Scope should include cumulative impacts of all wastes proposed to be disposed. In addition, the burden from prior disposal and contamination needs to be considered, along with mitigation measures. Analyses should be based on State cleanup and health-based standards and the Native American subsistence scenario, not solely DOE's own standards.
4. Scope should include consideration of the range of alternatives for cleanup and closure of the unlined burial grounds which includes pre-1970 waste sites and chemical wastes. The alternatives presented should be retrieval and cleanup to the extent practical in compliance with applicable requirements.
5. Scope should include an estimated inventory of wastes in the burial grounds, cribs and soil around leaking SSTs, and characterizing the extent and mobility of contamination as required by applicable laws. The EIS should include an explanation pursuant to 40 CFR 1502.22 of how the cumulative impact analysis can be performed when inventory and characterization data do not exist.
6. Scope should include alternatives for the treatment of tank wastes as entirely separate from alternatives for closure of tanks.
7. Scope should include a discussion of how DOE intends to make tank closure decisions on those tanks where there may be inadequate current characterization to support regulatory closure decisions.
8. Scope should include the cumulative and route-specific effects of transporting wastes from multiple sites to and from Hanford. For example, the HSW-EIS estimated impacts in Oregon and Washington using generic transportation

parameters. The analysis did not consider the specific transport route conditions, which may result in alternate routes being used.

9. The EIS should not assume additional landfill volume for offsite waste disposal beyond the limits established in the June 2004 Record of Decision.
10. The risks from Hanford waste should be clearly delineated from the risks from offsite waste in the EIS to determine whether acceptable risk levels will be exceeded prior to the addition of offsite waste. This delineation is needed to determine whether Hanford can accept offsite waste without unacceptable risk to the environment.

**TOPIC TWO: Infrastructure.**

Because of delays in the startup and operation of the Waste Treatment and Immobilization Plant to beyond 2017, important infrastructure that was originally expected to operate 2007-2018 may exceed design life and need replacement by the time of hot startup. As a result, the scope should include actions, alternatives, and impacts related to replacement of aging infrastructure due to extended TPA schedules.

1. Scope should include replacement or life-extension of 242-A Evaporator.
2. Scope should include life-extension of the 222-S Analytical Laboratory, or replacement or consolidation with the Waste Treatment and Immobilization Plant Analytical Laboratory.
3. Scope should include modifications, additions and/or life-extension of the Effluent Treatment Facility.
4. Scope should include the impact of retrieval delays on the ability to retrieve waste from deteriorating waste tanks with failing infrastructure.
5. Scope should include analysis of electrical, water supply, support and transportation facilities and other general infrastructure.

**TOPIC THREE: Compliance with TPA, EPA requirements and State requirements.**

1. Scope should include at least one alternative that is fully compliant with the TPA and EPA and State requirements (e.g., emptying the tanks to 99% and

characterizing and remediating leaks and releases from the tank farms to the extent practicable.) Any alternative with elements that do not meet TPA requirements should only be presented as a "contingent."

2. Scope should not include consideration of a proposed alternative to leave ten percent of the waste in the tanks.
3. Scope should include identification of injury to natural resources to meet the Natural Resource Damage Assessment requirements of CERCLA.

**TOPIC FOUR: Quality Assurance.**

1. The EIS preparation process should include measures to ensure no repetition of the deficiencies and inaccuracies that the DOE Headquarters review of the Hanford Solid Waste EIS found in the health and safety analyses, as with the groundwater and transportation analyses. The TC&WM EIS should contain revised health and safety analyses.
2. Scope should include compliance with 40 CFR 1502.24, which addresses the DOE responsibility for oversight of methodology and scientific accuracy. DOE should ensure the professional integrity and scientific integrity of discussions and analyses in the EIS.
3. Scope should incorporate assumptions that reflect the minimum required default assumptions appropriate for Eastern Washington cleanup sites, including maximum reasonable exposure scenarios.
4. Scope should include a discussion of impacts which compare the health-based cleanup and risk standards in state law for cleanup. If decisions are proposed to leave waste or allow potential exposures which would result in violation of those standards, the scope of the TC&WM EIS should outline enforceable commitments to mitigate the impacts, and assess both alternatives for mitigation and impacts from mitigation (e.g., restricting use of a land area or groundwater resource).
5. Scope should include analysis of cost/benefit trade-offs of supplemental treatment (both pretreatment and immobilization) and of WTP construction, operations, decontamination and decommissioning costs pursuant to 40 CFR 1502.23.

**TOPIC FIVE: All known and reasonably foreseeable impacts to groundwater.**

1. Scope should include analysis of the impact of catastrophic events such as earthquake, fire and flood.
2. Scope should include consideration of precipitation change due to climate changes and include impact on vegetation.