

June 8, 2001

Keith Klein, Manager
Department of Energy, Richland Operations
P.O. Box 550 (A7-50)
Richland, WA 99352

Re: Low-Level Waste Burial Ground Expansion

Dear Mr. Klein

Hanford continues to face pressure to accept offsite waste while also facing severe challenges in dealing with its own waste. Now the U.S. Department of Energy (DOE) proposes to construct up to four new waste disposal trenches in Hanford's low-level burial grounds in the 200 East and 200 West areas. The additional disposal capacity is in large part intended to replace lost trench capacity due to disposal of waste from the Parks Township, Pennsylvania cleanup. DOE-Richland Operations Office (DOE-RL) would also like to have additional trench capacity available to provide some flexibility in waste disposal. For example, separating waste packages by container type in different trenches may allow for more efficient use of trench space.

DOE has prepared a draft Environmental Assessment (EA) to cover this proposed action. The conclusion of the EA is that the construction and use of the new trenches – which would be located between existing trenches – would not be expected to have any substantial addition to Hanford Site cumulative impacts.

DOE proposes digging new trenches as an interim action, pending release of the Hanford Solid Waste Environmental Impact Statement (HSW-EIS). DOE says the activity will not prejudice any alternatives or decisions in the HSW-EIS.

The Hanford Advisory Board (HAB) believes the EA is not sufficient to determine the environmental impacts of the use of new waste disposal trenches. Among our concerns:

- The EA does not adequately evaluate long-term environmental impacts. Nor does the EA technical analysis include any discussion of the limitations of groundwater monitoring in the 200 Areas – a problem which is getting worse as the water table continues to drop below the capability of existing wells to obtain samples.
- The statement in the EA that this action will not prejudice any alternatives or decisions in the EIS is inconsistent. Deciding to expand the trenches constitutes a choice of a specific alternative for solid waste

disposal This decision could impact future alternatives not currently available for review.

- DOE has repeatedly delayed the HSW-EIS. In the meantime, this is the third interim action proposed for the burial grounds. Individually, each of these activities may not constitute an unacceptable environmental impact. However, to assess their cumulative impacts, much more extensive analysis is needed than was conducted for the EA.

The HAB strongly recommends the EA be withdrawn and that no additional trenches be constructed until after the HSW-EIS is released and publicly reviewed, and a Record of Decision issued. DOE must honor the legal process, and to continually propose interim actions while release of the HSW-EIS is repeatedly delayed is not consistent with the spirit or intent of national environmental laws. The Board also advises the U.S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology) to adopt compliance schedules for monitoring the groundwater and vadose zone around the low-level burial grounds. These compliance schedules should not be subject to annual budget based negotiation with DOE.

The HAB has, on numerous occasions, insisted that costs for disposal of off-site waste at Hanford be fully funded by the generator site. The HAB does not believe that full funding can be identified until this HSW-EIS is completed.

In no case should DOE build the trenches prior to release of the HSW-EIS.

Very truly yours,

Todd Martin, Chair
Hanford Advisory Board

cc: Carolyn Huntoon, Department of Energy Headquarters
Chuck Clarke, U.S. Environmental Protection Agency, Region 10
Tom Fitzsimmons, Washington Department of Ecology
Wade Ballard, Deputy Designated Federal Official
The Oregon and Washington Congressional Delegations
Michael Gearheard, Environmental Protection Agency

This advice represents HAB consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.