

September 6, 2002

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U.S. Department of Energy, Headquarters
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Washington, D.C. 20585

Keith Klein, Manager
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Tom Fitzsimmons, Director
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John Iani, Regional Administrator
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
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Subject: Draft Hanford Solid Waste Environmental Impact Statement

Dear Ms. Roberson and Messrs. Klein, Fitzsimmons, and Iani,

The Hanford Advisory Board (Board) urges that the Department of Energy (DOE) revise and reissue the draft Hanford Solid Waste EIS (HSW-EIS) to integrate the information proposed as supplemental. Further, the document must include the missing analyses that other agencies and the Board have noted. There should be one integrated draft EIS using an inter-disciplinary analysis.

The requirements of the National Environmental Policy Act (NEPA) mandate the underlying assumptions and prior documentation be “summarized and discussed” in draft environmental impact statements – this needs to happen. Issuing a supplementary “information package” to the HSW-EIS does not address concerns over the failure of the HSW-EIS to summarize and discuss the prior documents and assumptions relied upon in the HSW-EIS, or the failure to provide access to requested information. The Board expects DOE will incorporate or respond to all comments received, including those from the Washington State Department of Ecology and the Environmental Protection Agency.

Board Advice #133 provided in-depth comments and identified major areas of concern in the HSW-EIS. The following are additional expectations for the HSW-EIS that were not previously transmitted:

The draft must provide essential lifecycle disposal cost information, including consideration of alternative sites. DOE recently committed to Congress that it would do this analysis before making disposal decisions. In addition, a No Action Alternative showing the impacts/benefits from not adding each individual off-site waste stream must be incorporated.

We urge DOE to collaborate with the regulators and stakeholders to ensure the NEPA notices for the HSW-EIS discuss the importance of this document and the public comment period.

Finally, we strongly object to DOE Headquarters taking action to begin shipping transuranic (TRU) waste to Hanford, by amending the Waste Management Programmatic EIS (WMPEIS) record of decision, without reviewing and responding to the comments of the public, Tribes, regulators, states and members of Congress on the draft HSW-EIS. A review of the WMPEIS reveals that DOE did not consider the impacts from importing TRU waste to Hanford, including both transportation impacts and the impacts from long-term storage and treatment of TRU at Hanford. The WMPEIS specifically said, “specific mitigation measures would be evaluated in a site-wide” EIS if TRU was moved to Hanford or other new sites. We urge DOE not to proceed with any action to import TRU wastes to Hanford until the full HSW-EIS analyses are completed, as called for in the WMPEIS, and until NEPA criteria are met.

Sincerely,

Todd Martin, Chair
Hanford Advisory Board

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.

cc: Wade Ballard, Deputy Designated Federal Official, U.S. Department of Energy
Michael Gearheard, Environmental Protection Agency
Michael Wilson, Washington State Department of Ecology
Martha Crosland, U.S. Department of Energy Headquarters
The Oregon and Washington Congressional Delegations