

Feb. 7, 2002

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

Tom Fitzsimmons, Director  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

Re: Acceptance of Offsite TRU Waste

Dear Msrs. Klein and Fitzsimmons,

The recent shipments of transuranic (TRU) wastes from Battelle Columbus (BCL) and Energy Technology Engineering Center (ETEC) to Hanford caused grave concern to the Hanford Advisory Board (Board). The U.S. Department of Energy (DOE) made this decision before the comment period of the draft Hanford Solid Waste Environmental Impact Statement (HSW-EIS) was completed. These shipments violated the principle that the impacts of, and alternatives to, adding more wastes to Hanford must be fully evaluated in an adequate environmental impact statement (EIS) and aired in a public process prior to wastes coming to Hanford. These actions should not set a precedent for accepting offsite waste or uncharacterized waste that has not met applicable Washington State and federal waste laws and regulations.

Because of concerns regarding the adequacy of hazardous waste characterization of these wastes, all the wastes shipped to Hanford from BCL and ETEC should be fully characterized as soon as possible, including lab analyses and tests necessary to meet Washington State Department of Ecology (Ecology) requirements.

Washington State should require DOE to provide documentation on all wastes that DOE intends to ship to Hanford under the BCL-ETEC agreement, to ensure that the wastes are not improperly stored and impacts are mitigated. In addition, there must be full public access to information on the TRU shipments. The process to resolve how the wastes are characterized, stored and treated should fully involve stakeholders.

Sincerely,

Todd Martin, Chair  
Hanford Advisory Board

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*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: Gary Locke, Washington State Governor  
Christine Gregoire, Washington State Attorney General  
John Iani, U.S. Environmental Protection Agency, Region 10  
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

U.S. Senators (OR)

Gordon H Smith  
Ron Wyden

U.S. Senators (WA)

Maria Cantwell  
Patty Murray

U.S. Representatives (OR)

Earl Blumenauer  
Peter DeFazio  
Darlene Hooley  
Greg Walden  
David Wu

U.S. Representatives (WA)

Brian Baird  
Norm Dicks  
Jennifer Dunn  
Jay Inslee  
Richard Hastings

Rick Larsen  
Jim McDermott  
George Nethercutt  
Adam Smith

State Senators (WA)

Pat Hale  
Mike Hewitt

State Representatives (WA)

Jerome Delvin  
Shirley Hankins