

April 2, 2004

Jessie Roberson, Assistant Secretary of Energy
U.S. Department of Energy, Headquarters
1000 Independence Avenue
Washington, D.C. 20585

Re: Final Hanford Solid Waste Environmental Impact Statement

Dear Ms. Roberson,

On February 13, 2004 the Department of Energy (DOE) issued the Final Hanford Site Solid Waste (Radioactive and Hazardous) Environmental Impact Statement (Final HSW-EIS). DOE Records of Decision (RODs) may now be issued based on the Final HSW-EIS.

Because far-reaching decisions will be based upon this document, the Hanford Advisory Board (Board) has multiple concerns with the Final HSW-EIS.

- The intent of the National Environmental Policy Act (NEPA) is to provide opportunity for public comment on new analyses. There are numerous new analyses and conclusions in this document. The Board is disappointed in the lack of public process to review the new analyses and conclusions before the Final EIS was issued and before subsequent ROD(s) are issued.
- The Final HSW-EIS declares that groundwater underneath portions of the Hanford Site is “irreversibly and irretrievably” contaminated.

As a result of these concerns, the Board:

- Advises that any DOE RODs issued as a result of the Final HSW-EIS should clarify that no irreversible and irretrievable commitment of groundwater has already been assumed or will be made as a consequence of any action addressed in this EIS. Further, ongoing cleanup programs should continue to address historic releases with the goal of groundwater restoration.
- Concurs with the Environmental Protection Agency’s (EPA) stated position (EPA letter to Michael Collins, DOE, dated 3-16-04) that “the ability to address existing groundwater conditions with the proposed project is beyond the scope of this EIS.”

- Advises that DOE provide additional public review and comment periods for significant new analyses and conclusions prior to issuance of any Final EIS.
- Recommends that DOE exercise a good-faith effort to obtain public review prior to issuance of RODs based on significant new analyses in this EIS.

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: Keith Klein, Manager, U.S. Department of Energy Richland Operations Office
John Iani, U.S. Environmental Protection Agency, Region 10
Linda Hoffman, Washington State Department of Ecology
Howard Gnann, Deputy Designated Federal Official, U.S. Department of Energy
Michael Gearheard, Environmental Protection Agency
Michael Wilson, Washington State Department of Ecology
Sandra Waisley, 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