

# HANFORD ADVISORY BOARD

A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act

**Advising:**

US Dept of Energy  
US Environmental  
Protection Agency  
Washington State Dept  
of Ecology

April 7, 2006

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Jay Manning, Director  
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Re: Tank Closure & Waste Management Environmental Impact Statement

Dear Msrs. Klein, Schepens, and Manning,

**Advice**

The Hanford Advisory Board (Board) is concerned that the timeline to develop and issue the Tank Closure and Waste Management Environmental Impact Statement (TC&WM EIS) is inadequate to ensure the quality of the requisite product. The present timeline is arbitrary and does not ensure that adequate characterization of contamination and waste will be performed before a credible cumulative impact analysis can be undertaken.

The Board has repeatedly called for a cumulative impact analysis in a Central Plateau EIS. The TC&WM EIS presents an opportunity for just such an analysis.

As soon as possible, Ecology should identify the state requirements that are necessary to define an adequate EIS under the State Environmental Policy Act (SEPA) and the relevant rules related to state decisions that will be made from this EIS.

The following comments on the scope of the EIS are also Board advice. Attachment 1 provides new comments detailing the Board's advice. Attachment 2 provides previous Board advice relevant to this EIS.

HAB Consensus Advice #185  
Subject: TC&WM EIS  
Adopted: April 7, 2006  
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## **General Comments**

- o All known existing and planned waste streams on the Hanford site should be included in the analysis to provide a sound foundation for cleanup decisions and remedy selections. After credible characterization is done, the cumulative impact analysis will need to address the impacts from policy choices and alternatives for such things as:
  - a) retrieving pre-1970s and other buried and discharged wastes;
  - b) contamination from high-level nuclear waste tank leaks; and,
  - c) long-term stewardship.

The analyses of alternatives in the EIS, after characterization, must address what will be done with the wastes retrieved; what are the quantities and types of wastes which may remain, need treatment or disposal; and what are the impacts from each alternative.

- o DOE currently estimates the EIS will take two years to complete (with a Record of Decision issued in June, 2008). The Board is concerned that the schedule does not allow for the necessary characterization. While the Board is not suggesting an open-ended characterization project, reasonable characterization of waste sites not currently adequately characterized is necessary to support credible analyses. The schedule for the EIS should be driven by characterization, data, and analysis needs, not an arbitrary timeline.

A reasonable timeline should be provided to the public regarding the time required to characterize waste releases and residues to meet the minimum requirements for a credible cumulative impact analysis.

As support for this concern, in response to Board Advice #148 (August, 2003), the EPA Region 10 Hanford Project Office stated that site-wide analysis of cumulative impacts could be initiated by 2008 based on the completion of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and Resource Conservation and Recovery Act (RCRA) facility investigations.

- o The EIS must recognize, incorporate and meet the requirements, methodologies and standards of all applicable federal and state regulations. Failing to meet these requirements could result in an EIS that is not acceptable to Washington State and result in wasted time, money and effort.
- o The EIS should include analysis of at least one alternative that complies with the Tri-Party Agreement for treatment and removal of tank wastes.

- o The EIS should be accompanied by a peer-reviewed quality assurance process. Past Board Advice (#162) recommended an independent panel to review the groundwater risk assessment work in the Tank Closure EIS, Solid Waste EIS and Composite Analysis on behalf of the Board. This panel was never constituted. However, this EIS provides an opportunity for the spirit of this advice to be included during the development of the TC&WM EIS.
- o Additionally, DOE and Ecology should work with the Board to create public involvement mechanisms that ensure regular dialogue between risk assessors, document authors and stakeholders concerning the status of the EIS and its assumptions, analyses, methodologies, etc. This dialogue can be used to illustrate how Board comments have been incorporated into the EIS, will assist the agencies in real-time problem resolution, and will hopefully build Board support for the final EIS.

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: Carol Borgstrom, Director, Office of NEPA Policy and Compliance, U.S. Department of Energy, Headquarters  
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