



21 July 2021

Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

RE: Construction Approval Order DE19NWP-001, Site-Wide Water System Upgrade

On behalf of the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Department of Natural Resources, Energy and Environmental Sciences Program, we are submitting the following comments about the Site-Wide Water System Upgrade.

Water Systems Upgrade Notice of Construction Application Technical Information [DOE/RL-2020-33 Rev. 0]: Pg. 1-2:

The last paragraph reads: “L-838 – “Water Feeds to 622R, 6608 Facility, and 200W Sewer Lagoons”: This project will cut, cap, and abandon in place the existing export water line feeding the 622R Meteorology Lab, install a new raw water line that connects the existing raw water grid to the 622R Meteorology Lab ...”

Comment: CTUIR Hanford Policy states: “Hanford lands and resources should be restored to their pre-Hanford environmental conditions, or equivalent to those that existed at the time of the Treaty of 1855.”

Pipes and other unused infrastructure should not be abandoned in place as a disposal option, as this does not restore Hanford lands to “pre-Hanford environmental conditions.” This pipe, and any others replaced within the planned Site-Wide Water System Upgrade should be removed and properly disposed.

Requested Actions: Make appropriate changes to the Notice of Construction application on all piping and infrastructure that will be replaced or upgraded, specifying that replaced or to be unused items will be removed and properly disposed.

If you have questions concerning this matter, please reach out.

Sincerely,

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