

Nancy Morris

Attention Department of Ecology and Governor Inslee:

The Test Bed Initiative (TBI) offers the opportunity to remove leakable liquids from tanks that are leaking today or are likely to start leaking soon. I have observed these serious issues for over several decades and finally hope for positive action from the Department of Ecology and Governor Inslee before another decade passes and more toxic nuclear waste leaks from these tanks. But it has to be done safely by only trucking solid, treated waste with very low radioactivity – not trucking untreated liquids through Spokane and other vulnerable communities and Indian Reservations.

Hanford's groundwater and the Columbia River will be contaminated for thousands of years if all the waste that is currently planned to be removed from Hanford's tanks is disposed in landfills onsite. So it is imperative that the TBI be done with the highest technical standards and safety so there is a viable way forward to remove toxic nuclear waste.

Therefore Ecology should not permit the US Department of Energy (USDOE) to truck untreated liquid wastes from Hanford's High Level Nuclear Waste tanks through Spokane or across Oregon and the Umatilla Indian Reservation.

I strongly support moving forward with the test to remove and treat 2,000 gallons from Hanford's tanks for disposal offsite in licensed facilities where the waste does not create any risk to groundwater; Ecology has a duty to consider and take "mitigation" action to prevent the risk from a truck accident in Spokane or anywhere on the 900-1,900 mile truck routes. This is an environmental justice issue as well as a risk to the Spokane River.

I agree with the Umatilla Tribe whose Chair wrote to USDOE:

"The current plan to transport waste in liquid form poses for us an unacceptable risk of spills and harm to the environment, First Foods, and our citizens. The current proposal is especially disappointing given that shipping waste in a grouted, immobile, solid form is a viable and much safer option. "To be clear, the CTUIR requests the following:

1. Do NOT ship liquid Hanford tank waste across the Columbia Basin. Only ship this waste in GROUTED/SOLID form.
2. Move forward with large-scale grouting and out-of-state disposal as soon as reasonably allowable to decrease the risk of leaking Hanford tanks on the CTUIR's treaty-protected resources."

USDOE agreed not to truck the waste through Oregon and the Umatilla Reservation. Unselfishly, the Umatilla Tribe has continued to advocate that liquid wastes should not be trucked at all when there is a licensed facility that can solidify and treat the waste next door to Hanford and avoid trucking wastes through Spokane on I-90 for 900 miles to Utah or 1,900 miles to Texas for disposal.

I want the test for 2,000 gallons of waste to proceed. But if it succeeds there will be thousands of shipments. Ecology has a duty under SEPA and the HEAL Act to consider and mitigate the risks from truck shipments through low income "overburdened" communities in Spokane or on Indian

Reservations by requiring that the waste is solidified and treated at the licensed facility adjacent to Hanford instead of trucking untreated liquid waste.

Any spill of liquids from Hanford will be an international news incident as well as putting residents and the environment at risk.

USDOE did not even consider risks from the chemicals in the liquid wastes and acknowledges that there is a risk of one "accidental crash" for a truck with these wastes every 884 shipments from Hanford to Texas. That is too high a risk to go without Washington requiring that the waste be solidified before being trucked through Spokane or Oregon and the Umatilla Reservation. To reiterate the Test Bed Initiative (TBI) offers the opportunity to remove leakable liquids from tanks that are leaking today or are likely to start leaking soon.