

Eric Adman

I support removing waste from Hanford for disposal offsite where there is no risk to contaminate groundwater or a river. I live in Kenmore, WA. I expect my Washington State agencies and Governor to use every power they have to ensure that liquid radioactive wastes are not shipped through downtown Spokane when there is a far safer alternative to treat and solidify Hanford's tank wastes before they are shipped for disposal. I want an EIS before the agencies adopt this program.

I strongly support accelerating removal of waste from tanks in the 200 West Area. This is where 2 of the 3 tanks that are currently leaking are located. Acceleration is only possible if this waste can be treated and solidified into a grout and disposed offsite – in licensed facilities that have no groundwater. However, the waste must be treated and solidified before it is shipped up to 1,900 miles for disposal.

Washington State and Ecology need to adopt conditions that ensure the wastes will be treated and solidified before shipment through Spokane or Oregon. Treatment and solidification before shipment is available and a necessary mitigation measure for inherently greater risks from shipping liquid wastes. Under SEPA, Ecology has a duty to adopt such a mitigation measure before it can adopt any USDOE NEPA finding of no significant impact or that impacts were discussed in an outdated EIS 25 years ago.

If shipping liquids is not ruled out, then an EIS is needed before the agreement adopts this program. I want public hearings on an EIS – with discussion of potential impacts and alternatives – in my community.

An EIS needs to consider route specific risks, including through Spokane, Oregon communities, Tribal reservations and "highly impacted communities" identified under Washington's environmental justice law.

An EIS needs to include the cumulative risks from USDOE's related decision to ship liquid "secondary wastes" from Hanford tanks to the same potential disposal sites.

Leaking tanks must be prioritized for removal of all leakable liquids or full retrieval. Leaking tanks cannot be allowed to keep leaking until 2040 or later. USDOE needs to commit to immediate action to stop or reduce the leaks from Single Shell Tanks and dramatically increase the pace of waste retrieval.

The priority for which tank farms have waste removed on an accelerated schedule should be based on preventing more tank leakage. T-Farm, with 2 leaking tanks, should be prioritized to have waste removed. Otherwise, tanks T-101 and T-111 are likely to keep leaking

for decades.

USDOE should be required to continue to retrieve waste from tanks in the 200 East Area after 2028 while also starting to retrieve waste from tanks in 200 West. Enforceable milestones need to be added for removal of leakable liquids from 200 West tanks using in-tank pretreatment followed by treatment to be solidified and disposed offsite. This needs to be in addition to full retrieval of 22 tanks.

Pursuant to federal and state hazardous waste laws, removal of leakable liquids is required "as soon as practicable." The Agreement fails to include any commitment to meet this fundamental environmental protection standard. If removal of liquids from a leaking tank is documented as not being practical, then that tank should be prioritized for early retrieval. The agencies must explain the rationale for why they did not include the tank farm with leaking tanks (T Farm) to be amongst the 3 tank farms they chose to be retrieved by 2040 in the Agreement.

An EIS is required to review the impacts of decisions, such as not retrieving waste from leaking tanks; and to present reasonable alternatives to stop the leaks and speed up retrieval before more tanks leak.

Under the Agreement, milestones would be revised within a few years after the startup of the vitrification plant for High-Level Nuclear Waste. This does not take into account the likelihood that the High-Level Vitrification Plant will not get completed on time or will have significant safety and engineering obstacles. The agencies should adopt an earlier alternative trigger to start negotiating a "Plan B".