

# Theodora Tsongas

Thank you for this opportunity to provide comments. I am writing to express my concerns regarding the transportation of Hanford waste through communities and states, not limited to but including central Oregon.

Regarding the plan to transport Hanford tank waste through central Oregon, it must be considered that our region's closest Hazmat Regional Response Team is in Salem Oregon, making central Oregon particularly vulnerable to transportation incidents involving hazardous materials. The plan for transporting the so-called low-activity waste has not been specified and the commitment for additional public engagement once specified is unclear. This is problematic as it requires transport by either truck or rail through populated corridors, no matter which route is selected, and it is clear that waste in a liquid form poses significantly more risks to our communities, environment and health than waste in a solid form.

There are three critical issues still unresolved: treatment of waste prior to transport, means of transport, and NEPA. These issues have been left open for future decisions by the Department of Energy without assurance of further consultation and notification of the public, Tribes, or the state of Oregon or other states and communities through which the waste would be transported.

Specifically, the terms of the current agreement do not specify whether liquid tank waste will be solidified into a cake form and/or grouted or vitrified before transport or after transport to a final disposal site. The transport of liquid tank wastes is unacceptable because of the extreme danger of mishaps during rail or truck transport that would only exacerbate the long term dangers to the public and our lands and waters, and defeat the purpose of transporting the waste from Hanford. Only solidified tank waste, preferably vitrified in glass, should be considered for transport from Hanford.

Offsite tank waste disposal requires close cooperation between several levels of government, some of whom have never previously been impacted by Hanford issues and must be consulted prior to decision-making. The current draft agreement leaves critical issues open for decision by the U.S. Department of Energy without assurance of further notice, engagement, or comment. We simply cannot accept this lack of transparency and participation.

Furthermore, the plan for transport is not finalized and will be left up to the Department of Energy to make decisions without consultation or notification or public comment. This is unacceptable! It is NECESSARY that the public, Tribes, states and potentially impacted communities be consulted prior to any such plan being put into place. It is our right to have input into these decisions that will surely impact our lives!

It is not clear how the federal agencies intend to address NEPA requirements for assessing the risks of the alternatives for transport of the waste to the final destination for disposal. A roadmap for incorporating input and consultation is missing and must be developed before any action is taken to transport the wastes. At the very least, a complete environmental impact assessment of the risks of this proposed activity must be conducted with necessary public involvement and transparency in the process.

Finally, this agreement seems to have given little to no consideration to equity or environmental justice in its decision making process. Low income and rural communities will reap the brunt of long and short term adverse effects on health, home, and livelihood of any miscalculations or errors in this process or in the implementation of this plan.

The agreement represents an important step toward risk reduction at the Hanford site but it requires innovative solutions and careful consideration of the long-term environmental and public health impacts. It is absolutely incumbent upon the agencies involved to ensure the Hanford tank waste mission can progress more effectively and safely, while minimizing long-term environmental and public health risks, and with the full involvement of the public who stand to be most impacted by missteps, errors, and accidents.

Thank you for your attention to these concerns.