

# Richard Ellison

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Commenting on Hanford's Proposed amendments to Tri-Party Agreement and Consent Decree

Hello,

I visited the Hanford site with a congressional aide tour in 1985. At that time it became obvious that Hanford officials were deliberately misleading the public about the amount and severity of the leaks from single walled high level nuclear waste tanks to the environment.

I have commented at your public forums over the years in Seattle, to encourage the responsible cleanup of these tanks and other wastes. Repeatedly USDOE has tried to delay cleanup and cleanup goals, and this new proposal is not acceptable. Repeatedly USDOE has promised to accelerate cleanups but then delays and finds other risky alternatives. There must be a new EIS if wastes are to be transported offsite, especially untreated wastes.

The government continues to act highly irresponsibly by not stopping the leaking of high level nuclear wastes from its single walled tanks. These tanks have been known to be prone to leakage, and have repeatedly failed. The risk of leaks reaching the groundwater, which likely already has, are significant. Trucking nuclear wastes through populated areas before being properly treated is also extremely dangerous to the public and environment. All of these issues must be evaluated in a new EIS.

I request public hearings for a new EIS – with discussion of potential impacts and alternatives – in my community, and other communities throughout Washington and Oregon. Any EIS needs to consider transport route individual risks, including communities like Spokane and others in Oregon or any along the travel corridor. This should include Tribal reservations and other "highly impacted communities" identified under Washington's environmental justice law. Any EIS needs to include the cumulative risks from USDOE's related decision to ship liquid "secondary wastes" from Hanford tanks to out of state potential disposal sites.

Why isn't Washington State extremely concerned about USDOE's proposed trucking millions of gallons of liquid waste through heavily populated areas and across important waterways? What are the risks of impacts if there is an accident or terrorist attack that results in the spilling of these highly toxic, long lasting nuclear wastes to citizens and the natural environment?

Why isn't Washington joining Oregon in urging that the wastes are treated and solidified before being shipped 1,575 to nearly 1,900 miles to be disposed in Texas? Why isn't Washington Ecology at least insisting that an environmental impact statement (EUIS) be prepared to consider the risks and alternatives before the agreement adopts this program?

## LEAKING HIGH LEVEL WASTE TANKS CLEANUP

USDOE should remove liquids from the High Level Waste tanks that are currently leaking regardless of alternatives. This waste can be treated and solidified into a grout and disposed offsite –

in licensed facilities that have no groundwater. But, the waste must be treated and solidified if it is shipped offsite, possibly up to 1,900 miles, for disposal. It is necessary to "do no further harm."

EPA and Ecology have repeatedly found "serious" leaks from single walled High Level Waste Tanks, and promises were made to the public in the past to remove all wastes from single walled tanks and move them to double walled tank. But still this has not been accomplished. On August 15, USDOE announced that a third High-Level Nuclear Waste tank is actively leaking (Tank T-101). High levels of contamination from the Tank B-109 leak had already traveled about a third of the way through the soil towards the groundwater that flows to the Columbia River, when that leak was announced in April 2021.

By postponing cleanup deadlines, USDOE avoids accountability and safety risks grow. Do not allow the past TPA deadlines to be denied.

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 must be required to continue to remove waste from tanks in the 200 East Area after 2028, while also starting to retrieve waste from tanks in 200 West. Enforceable deadlines need to be added for removal of all 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.

Government proposals for the adoption of less protective cleanup standards and to either leave contamination in place – where it will exceed standards for thousands of years, or transport highly toxic and dangerous untreated wastes through populated areas, over a thousand miles is highly irresponsible.

#### COLUMBIA SHORELINE AREA CLEANUP

To honor Treaty rights and federal environmental justice commitments, USDOE should be required to accelerate cleanup along the Columbia River. USDOE should be required to cleanup to levels that will protect Native Americans exercising Treaty rights along the River in the next decade rather than leaving contamination in place at levels that will greatly exceed standards for hundreds of years.

Thank you,

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