

Richard Honour

Heart of America Northwest's concerns & suggestions for comments at

public meetings July 9-11 and to submit:

- Washington Ecology, USDOE and EPA should hold public meetings in Seattle, Portland and Spokane.
 - o The agencies had 4 years to negotiate and had an "agreement in principle" for a year. That was ample time to plan for meaningful public review and comment. Denying concerned publics a voice in the region's largest cities appears to be a political choice – one which WA Ecology should not support.
 - o A meeting in Spokane is particularly important because the agreement could result in thousands of truck shipments of liquid radioactive waste through the city – without any risk, impact or alternatives disclosed in an EIS.
- The agencies need to honor the public's rights to have an environmental impact statement (EIS) disclosing impacts, especially from the likelihood of many more tanks leaking under the agreement timelines and from trucking liquid radioactive waste through Spokane; and alternatives. An EIS should be available during the comment period. No agreement should be signed without understanding the impacts and alternatives or mitigation available.
- Ecology needs to require USDOE to remove leakable liquid wastes from the leaking tanks starting next year. Years of more studies are not needed before meeting the legal requirements to remove as much waste from leaking tanks as needed to stop the leak "as soon as practicable."
 - o A regulatory report has already found saltwell pumping should be used to remove leakable liquids when tanks leak. The In-Tank Pretreatment System (ITPS) is available to remove liquids from leaking tanks quickly with the waste trucked nearby for treatment.
 - o Federal and state laws require removal of leakable liquids as soon as practicable.
- Treated tank waste should be removed from Hanford and disposed at sites where there is no risk that leaching will contaminate groundwater and rivers. We support the landmark portion of the agreement to remove low radioactive liquids from tanks in 200West to be treated and disposed at offsite licensed facilities where there is no risk to groundwater or rivers.
 - o All LAW tank waste cannot be disposed in Hanford landfills without contaminating groundwater and the Columbia River. Vitrification is only required for waste disposed at Hanford. Vitrification makes no sense for disposal where there is no groundwater. Vitrifying all the LAW waste would take so long that dozens of tanks would leak before they are emptied.
- The agreement needs a "Plan B" addressing what will happen if the High Activity Waste Vitrification Plant does not startup by the end of 2033. The agreement is based on a questionable presumption that HAW vitrification will begin by the end of 2033. There should be a "Plan B" to set new schedules if it becomes apparent in the next five years that the HAW vitrification plant will be delayed or may not be completed.