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No new environmental impact statement has been prepared for any of the 52 units and the many risks, delays and changes that have been revealed since the US Department of Energy's (USDOE's) 2012 Tank Closure and Waste Management EIS. Rather, Ecology adopts the 2012 EIS and a few other documents – even ones which Ecology itself was critical of for failing to consider the known range of potential impacts.

This is unacceptable and must be corrected.

Additional issues:

The permit fails to bar USDOE from trucking millions of gallons of liquid radioactive hazardous wastes from Hanford's High level Nuclear Waste tanks through Oregon or Spokane en route to be treated and disposed in Texas or Utah.

USDOE estimates the offsite disposal program would send 582 trucks per year and 12 per week through downtown Spokane and/or Oregon.

I support offsite disposal to reduce the total amount of waste disposed at Hanford. This will protect the Columbia River and groundwater. But, trucking the liquid waste instead of treating and solidifying it before it is shipped is far more dangerous. USDOE failed to do an EIS update on the route specific impacts. Unless an EIS is done, Ecology must bar shipment of liquids.

The permit fails to require leaking High Level Nuclear Waste tanks to be emptied within one year of a tank being identified as leaking or potentially leaking. Three tanks are leaking currently. State and federal hazardous waste laws require leaking dangerous waste tanks to have all leakable liquids emptied immediately or as soon as practicable.

RCRA and the state hazardous waste law also require RCRA permits to have a "contingency plan" incorporating the specifics of how the permittee will remove all leakable liquids from a leaking or suspected leaking tank as soon as practicable. There is no contingency plan in this sitewide permit for the 149 Single Shell High Level Nuclear Waste tanks (SSTs).

The proposed permit lacks a condition ensuring that "No grouted tank waste will be disposed of within the contiguous borders of the Hanford Nuclear Reservation.

An environmental impact statement is needed for the risks and impacts from the delayed removal of the highly dangerous 324 Building, which is 300 yards from the Columbia River and has lethal levels of radioactive contamination underneath it.

USDOE has indefinitely delayed removal and remediation of the 324 Building. Instead of a new environmental impact analysis of the risks, USDOE adopts EPA CERCLA reviews of the cleanup plans for the 324 building. However, USDOE failed to disclose to regulators that the fire suppression system in 324 is inoperable, that there is a reasonable risk of a fire, and that the consequences of the reasonably foreseeable fire are enormous and lethal. The documents adopted by Ecology fail to disclose and consider these risks.

An EIS is needed for the risks from continued storage of wastes at Hanford's Central Waste Complex. USDOE built the complex without getting RCRA permits and without any environmental impact analysis. There are thousands of containers that pose serious risks.

The permit should also include a strict schedule to treat and remove for disposal all backlog waste within three years.

The 40 miles of unlined ditches into which wastes were disposed in the 200 Areas (central Hanford) need to be in the permit with conditions requiring investigation, exhuming and treating wastes on a strict timeline.