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Washington State Department of Ecology
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Dear U.S. Department of Energy, Washington Department of Ecology, and U.S. Environmental Protection Agency:

Thank you for the opportunity to provide comments and questions on the future of Hanford cleanup.

General Comments

1. **End Goals of Hanford Site Cleanup**

The proposed revisions to the M-015, M-016, and M-085 milestones impact much of the Hanford cleanup, aside from tanks, because they take the place of many Tri-Party Agreement (TPA) deadlines, and because they are adaptive, it is all the more important that the TPA Agencies reckon with the end goals of cleanup. One of these goals ought to include returning the Hanford Site, to the maximum extent possible, to a state which can be used by Tribes, under their Treaty-reserved rights. As a matter of fact, the law requires it. For years, the Hanford Advisory Board discussed the importance of working towards goals for the River Corridor that maximized unrestricted use of the River Corridor after cleanup. The importance of this was that it coincided with the legal responsibility of the federal government to honor the Treaty-reserved rights of Tribes at Hanford to use the area as they have since time immemorial. Realizing that this is not always possible in the short term does not absolve the TPA Agencies from the responsibility to work towards that end goal.

How does an adaptive milestone approach hold the agencies accountable to the end goals of cleanup? More importantly, what if TPA agencies disagree now (or in the future) about what those end goals are?

2. **Public Participation Under an Adaptive Milestone Framework**

The key focus areas for the initial set of M-100 interim milestones include establishing a milestone framework for continued use of an adaptive milestone process. This would provide the TPA Agencies with more flexibility to change milestones. While we understand the concept around the adaptive milestone process, the opportunities for public engagement appear more ambiguous and deadlines seem more tenuous. We urge the TPA Agencies to specify that milestone changes will be publicly noticed, with opportunities for public comment and engagement.

During the public meeting, in response to questions about public engagement opportunities, TPA agencies encouraged the public to offer feedback whenever possible. While an open invitation is appreciated, frankly it's insufficient. Tracking information through the Administrative Record is difficult and haphazard and only offered in English. It also takes considerable time. These factors discourage public participation. We ask that agencies seek opportunities to open up the public input process so that when new milestones are added or existing milestones altered, public comment periods are triggered. There is so much potential for cleanup outcomes to shift, and on-the-ground actions to slip far into the future, that the more effort the agencies put into transparency regarding adaptive milestones, the more confidence people can have in what will ultimately be the outcome of cleanup.

3. **Accountability**

The Tentative Agreement states, "[w]hen DOE-HFO does not receive compliant funding from Congress, then the Parties will discuss reassignment of priorities on an ongoing basis." The Hanford Site just recently received a record budget of $3.2 billion, however, Ecology calculated that Hanford needs a budget of $6.15 billion to meet all of its legal cleanup obligations for FY 2026, and $6.76 for FY 2027. With an adaptive milestone approach, what prevents the TPA Agencies from prioritizing work that fits in budget and demonstrates progress but is not necessarily the most protective, time-sensitive cleanup. What prevents the TPA Agencies under this new approach from continuously punting the most complex, expensive milestones? Additionally, how does this new milestone approach not encourage adopting cheaper, quicker cleanup methods, methods which may not provide long-term safety for people and the environment?

Lastly, since priorities are reassignable and dates are more malleable how does an agency, who is a party to this agreement, hold other parties accountable, if conflict arises?

4. **Transuranic Waste**

On Page 21 in the description of the changes, it's stated that, "in developing the initial set of M-100 interim milestones, the Parties also placed continued emphasis on startup of transuranic and transuranic mixed waste certification and shipping under the M-091 milestones." Are field characterization efforts in the Central Plateau burial grounds also taking into account potential transuranic waste from the 618-11 burial ground or other sources of potential TRU wastes, such as cleanup and demolition surrounding the 324 Building?

It's a little difficult to see how the emphasis on startup of transuranic and transuranic mixed waste certification and shipping appears in the revised milestones. Will the field characterization efforts be completed at a pace and thoroughness to support the emphasis on TRU, and TRUM?

5. **PFAS**

Energy just released its plan to establish sampling for background levels of some PFAS contaminants at Hanford. How will future characterization and sampling for PFAS in waste sites and groundwater inform cleanup actions? Will data be available to inform cleanup plans in the Central Plateau and the River, based on current efforts from DOE to better understand the distribution of PFAS at Hanford?

Specific Comments

1. **M-100-03**

Based on discussions in public meetings, it seems that new exposure assumptions (like we see with hexavalent chromium) and new information that has come to light (such as the issues of PFAFS) will be addressed in the CERCLA five year review process. From Riverkeeper's understanding, that process will begin in 2026 and conclude in 2027. The M-100-02 milestone says that the TPA agencies will meet every five years beginning on October 15, 2030. How will updated standards from that CERCLA five year review get incorporated into these milestones? Will that not occur until 2030? If so, that timeline is very concerning considering it has already been several years since the EPA's IRIS update for hexavalent chromium.

2. **M-100-4, M-100-5, M-100-6**

We appreciate the attention to work in the 100-B/C Area, where it is clear that ongoing study efforts could bring new information into the process that could improve cleanup. How does information from the remediation action completion report and benthic invertebrate studies affect the end state of the cleanup for 100-B/C-1 and 100-B/C-2? The remedial action will be complete by 2030 for both, according to the milestones, and the benthic invertebrate sampling will be done in 2028. How will the sampling inform what you do next in the 100-B/C Area?

3. **M-100-07**

Why is it anticipated that the final Record of Decision for the 100-N area will take an additional four years to complete?

4. **River Corridor Cleanup**

We commend the everyday effort to pump-and-treat hexavalent chromium out of the groundwater, to clean up soil sites to reduce the sources of pollution to groundwater, and to study the entire River Corridor for how it is responding to cleanup. This work is generationally significant, and we see the impact of it in terms of returning salmon runs, wildlife thriving and expanding in ways unexpected, and the hope of the next generation inheriting a Hanford that is less polluted than what exists now. However, a significant amount of clean up remains.

Overall, the reduction of hexavalent chromium levels in the River Corridor is a huge aspect of the work. Are there any changes to cleanup levels or strategies for hexavalent chromium at this time which may impact these new milestones? Is it possible that there will be an increase, expansion, or prolonging of pump-and-treat efforts along the River Corridor as a result of revised hexavalent chromium cleanup standards? Will new soil cleanup be a potential part of the milestones involved as part of the adaptive milestone process?

5. **M-00-10**

Concerns have been raised by HAB members and previous public commenters about the path forward for 324 Building demolition and remediation of the 300-296 waste site. Columbia Riverkeeper recommends adding enhanced air monitoring and dust prevention measures into the milestones to address issues of worker safety and the potential hazard of contamination being mobilized during demolition. Would it be better to enclose some aspects of the demolition, and ready the area also for the potential discovery of transuranic or high-level material?

6. **M-100-11**

Why is there no milestone for demolition of the 324 Building? If this is considered an interim milestone, why is the current M-100-11 milestone for the building going cold and dark considered an adaptive milestone, as opposed to interim? Columbia Riverkeeper recommends adding aspects of the demolition into the milestones and the potential discovery of transuranic and high-level material.

7. **M-100-12, M-100-12A, M-100-12B, M-100-12C**

The milestones, on pages 24 and 25, refer to groundwater monitoring and evaluation near the 618-11 site. TPA Agencies' focus on getting a plan together for 618-11 is essential. Addressing this burial ground is a major challenge due to the intensely radioactive material dumped in vertical pipe units, caissons, trenches, and the presence of a large tritium plume underscores the importance of cleanup. The photo below from PHOENIX shows the extent of the tritium plume emanating from the 618-11 burial ground.

Please describe the public process in regards to the 618-11 burial ground. Where can the public evaluate how Energy develops additional actions to protect human health and the environment due to pollutants that come from the area at 618-11? We urge agencies to hold public hearings on cleanup plans for 618-11 due to the proximity of the burial ground to Richland, the potential for waste to ignite (as we saw with 618-10, a

closely located burial ground), for dust to spread, and for nearby development to be impacted (or impact) the cleanup.

Currently, the milestones call for agencies to provide, by 2027, a remediation execution plan for 618-11, including cost estimates, activity sequence and durations, and identification of constraints, as well as integration points with Energy Northwest. When this process unfolds, will the public have an opportunity to comment on the proposed plans and the cleanup levels that result? When will tritium and nitrate levels be restored to drinking water levels in the area as a result of cleanup efforts? We ask agencies to hold public meetings about the cleanup of this area before decisions are locked into place about how cleanup will proceed. It is not acceptable to leave pollution in 618-11 that prolongs the presence of a highly concentrated tritium plume in Hanford groundwater.

As part of the 618-11 remediation efforts, how is Energy accounting for new potential soil disturbances and developments in the area that could complicate the cleanup from nearby proposed nuclear reactors? At the very least, how would an increase of workers in this area be impacted by remediation efforts which may cause increased exposure and safety risks?

8. **M-100-13**

At the K Area, when undertaking stack demolition by October 2026 to enable soil cleanup, how will the TPA Agencies be mitigating the risk of spreading dust? What air sampling measures are in place during demolition of the stack to ensure pollution does not enter the River and shoreline areas? Will there be public warnings so that people will know to avoid the area when the stack is demolished? Understanding that these issues are going to be addressed in cleanup plans, it is important that milestones take into account the multiplicity of actions taking place in the River Corridor that could impact the environment.

9. **M-100-14**

Milestones putting focus up and down the River Corridor are essential, and it is clear that 2027 will involve major cleanup impacts near the Columbia River. The M-100-14 Milestone captures a lot of potential plans for soil remediation in the 100-K Area.

How will cleanup levels for these soil sites be affected now that EPA has updated its IRIS database for hexavalent chromium? Please provide an accounting of how the five year CERCLA review process will interact with the adaptive milestones now and in future reviews.

The 10-year plan for the 100-K Area, taken into consideration with the 618-11 waste site, and the 324 Building, will offer a lot of moving pieces for the public to consider in 2027. For all of these actions, how can Energy be sure that monitoring and mitigation is in place to prevent the spread of hexavalent chromium dust, or other pollutants, so close to the River, and will the public be invited to comment on these plans? Will they involve establishing milestones that result in cleanup levels being reached over a specific period of time?

Conclusion
Overall, the adaptive milestone process holds a lot of potential to allow the agencies to more nimbly address the Hanford cleanup. It also holds the potential to allow for the slippage of cleanup which may be difficult, expensive, or lacking in federal backing. A paucity of public transparency and ability to hold TPA Agencies accountable, coupled with a de-regulation of nuclear safety standards and a push for nuclear energy development coming from the federal government may be setting the stage for a rushed and insufficient clean up.

Thank you for the opportunity to provide public comment.

Sincerely,

Dan Serres
Advocacy Director
Columbia Riverkeeper