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HANFORD TANK WASTE REMEDIATION SYSTEM

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ENVIRONMENTAL IMPACT STATEMENTS

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PUBLIC SCOPING MEETING

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FEBRUARY 14, 1994

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HANFORD HOUSE/RED LION

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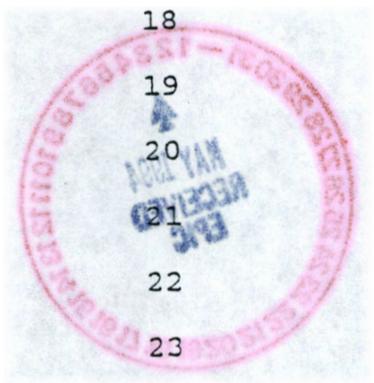
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1 MS. ALINDA PAGE: Good afternoon.  
2 I would like to formally commence today's public  
3 meeting and to welcome on behalf of the U.S.  
4 Department of Energy and the Washington State  
5 Department of Ecology all of you who have come  
6 today.

7 Today's scoping meeting is officially  
8 designated as the Richland public scoping meeting  
9 for the two proposed Environmental Impact  
10 Statements at the Hanford Site, Richland,  
11 Washington.

12 One EIS will address the proposed  
13 Tank Waste Remediation System activities, and the  
14 second will address the proposed construction of  
15 six new safety tanks for the storage of  
16 high-level radioactive waste as an interim action  
17 to the Tank Waste Remediation System Environ-  
18 mental Impact Statement.

19 The meeting is being held on the 14th  
20 day of February, 1994, at the Hanford House in  
21 Richland, Washington, and we are commencing at  
22 1:00 p.m.

23 Today's meeting is the first of five  
24 being held in Washington and Oregon during the  
25 month of February.

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1 Today's schedule calls for the  
2 afternoon session to last until 4:30 p.m., at  
3 which time we will recess for a dinner break.  
4 The evening session will commence at 6:30 p.m.  
5 with a repeat of the opening remarks and a review  
6 of the meeting's procedures. Tonight's meeting  
7 is scheduled to adjourn at 10:00 p.m.

8 My name is Alinda Page, and I am a  
9 professional moderator working on contract. My  
10 company is Triangle Associates from Seattle,  
11 Washington.

12 I have been asked, by the  
13 Department of Energy and the Washington State  
14 Department of Ecology, to conduct this scoping  
15 meeting to ensure that all individuals and  
16 organizations here today who wish to comment on  
17 the scope of the upcoming Environmental Impact  
18 Statement have a fair and equal opportunity to do  
19 so, in keeping with both the letter and the  
20 spirit of the National Environmental Policy Act  
21 and the State Environmental Policy Act.

22 The National Environmental Policy  
23 Act of 1969, commonly referred to as NEPA,  
24 requires that any federal agency proposing an  
25 action that might have impacts on the environment

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1 evaluate all reasonable alternatives and their  
2 potential environmental impacts before taking  
3 action.

4 When the projected environmental  
5 impacts might be considered significant, an  
6 Environmental Impact Statement must be  
7 prepared.

8 NEPA also requires that the public  
9 be provided opportunities to comment during  
10 preparation of the Environmental Impact  
11 Statement.

12 The Washington State Environmental  
13 Policy Act, commonly referred to as SEPA, is very  
14 similar to NEPA in its intent and purpose. Like  
15 NEPA, SEPA requires any state agency proposing an  
16 action that might have impacts on the environment  
17 to evaluate all reasonable alternatives and their  
18 potential environmental impacts before taking  
19 action.

20 The potential Washington State action  
21 in the remediation of the high-level tank wastes  
22 and the construction of six new safety tanks  
23 would be the issuance of required Washington  
24 State environmental permits and authorizations,  
25 if the determination is made to proceed with the

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1 proposed action.

2 As with NEPA, when the projected  
3 environmental impact might be considered  
4 significant, an Environmental Impact Statement  
5 must also be prepared. SEPA also requires that  
6 the public be provided opportunities to comment  
7 during the preparation of the Washington State  
8 Environmental Impact Statement.

9 Because the National Environmental  
10 Policy Act and the Washington State  
11 Environmental Policy Act are very compatible in  
12 their purpose, intent and procedures, the State  
13 of Washington Department of Ecology and the  
14 United States Department of Energy have decided  
15 to prepare one Environmental Impact Statement for  
16 each of the two proposed actions addressing the  
17 requirements of both SEPA and NEPA in a single  
18 document.

19 That is, a single EIS will address  
20 the Tank Waste Remediation issues and a single,  
21 yet different EIS will address the proposed  
22 construction of the six new safety tanks.

23 On Friday, January 28th, 1994, the  
24 Department of Energy published a Notice of  
25 Intent in the Federal Register announcing its

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1 intent to prepare these two Environmental Impact  
2 Statements.

3 One EIS, as I said, will address  
4 the proposed Tank Waste Remediation System  
5 activities, and the second will address the  
6 proposed construction of six new safety tanks  
7 for the storage of high-level radioactive waste  
8 as an interim action to the Tank Waste  
9 Remediation System Environmental Impact  
10 Statement.

11 On the same date, January 28th, 1994,  
12 the Washington State Department of Ecology  
13 determined that a SEPA EIS was required for these  
14 two projects.

15 The purpose of this scoping meeting  
16 is to have each of you have an opportunity to  
17 identify for the record the significant issues  
18 that you believe should be considered by the  
19 United States Department of Energy and the  
20 Washington State Department of Ecology in the  
21 preparation of these two Environmental Impact  
22 Statements.

23 The format for today's meeting has  
24 been designed to give as many people as  
25 possible the opportunity to participate,

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1 including those of you who do not wish to make  
2 formal comments.

3 We will take formal comments in this  
4 room throughout the time scheduled for today's  
5 meeting.

6 Concurrently, there is an informal  
7 information room next door with people from both  
8 the Department of Energy and the Department of  
9 Ecology. It's just the corner room right out  
10 this exit. The room will be staffed with Energy  
11 people and Ecology people and people from the  
12 Pacific Northwest Laboratory and Westinghouse  
13 Hanford Company, as well. Those individuals are  
14 available between one and 4:30 today and again  
15 between 6:30 and ten p.m. tonight to answer  
16 questions on an informal basis.

17 A verbatim transcript of this  
18 meeting will be made with all oral comments  
19 received contained in the transcript. And a  
20 transcript will also be made of the other four  
21 scoping meetings. It will be included in the  
22 United States Department of Energy and  
23 Washington State Department of Ecology's record  
24 of these proceedings. The Department of Energy  
25 and the Department of Ecology will make the

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1 transcripts from all five of the scoping meetings  
2 available at information locations located  
3 throughout Washington and Oregon as soon as they  
4 are available.

5 After they have reviewed all of the  
6 formal comments received at the scoping  
7 meetings and the written comments that are  
8 submitted during the scoping period, the two  
9 Departments, the Washington State Department of  
10 Ecology and the Department of Energy, will then  
11 jointly prepare two Draft Environmental Impact  
12 Statements.

13 When each Draft EIS is available,  
14 the public will once again have an opportunity to  
15 participate in this effort by submitting comments  
16 on the Draft EISs. The two Draft Environmental  
17 Impact Statements will be prepared on different  
18 schedules.

19 The Draft EIS for the six new  
20 safety tanks is scheduled to be available this  
21 year. The Draft EIS for the tank waste  
22 remediation program is scheduled to be available  
23 in 1995.

24 In a few minutes, I will review the  
25 procedures that I will be following for those of

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1 you who are interested in making formal oral  
2 comments at today's meeting.

3 At this time, however, I would like  
4 to introduction Mr. Geoff Tallent of the  
5 Washington State Department of Ecology who will  
6 make a brief presentation about the compatibility  
7 of the NEPA and SEPA processes. He will be  
8 followed by Dr. Donald Alexander of the  
9 Department of Energy's Richland Field Office Tank  
10 Waste Remediation System Program. Dr. Alexander  
11 will make a brief presentation on the proposed  
12 six new safety tanks and on the tank waste  
13 remediation system program.

14 Mr. Tallent?

15 MR. GEOFF TALLENT: Good evening.

16 My name is Geoff Tallent with the Washington  
17 State Department of Ecology.

18 The United States Department of  
19 Energy, which I have referred to as USDOE, and  
20 the Washington State Department of Ecology, or  
21 Ecology, are using an innovative approach to  
22 review the environmental impacts to the TWRS  
23 program by combining the requirements of NEPA and  
24 SEPA. The two agencies expect ourselves and the  
25 public to realize several benefits from combining

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1 these processes.

2 The USDOE and Ecology are preparing a  
3 Memorandum of Understanding between the two  
4 agencies will which allow us to streamline the  
5 NEPA-SEPA compliance process;

6 Allow for a joint NEPA-SEPA decision  
7 document, a combined EIS;

8 Accelerate the process by  
9 consolidating meetings, mandatory processes and  
10 documents;

11 And to provide a mechanism to  
12 expedite resolution of comments and issues.

13 Benefits of combining the NEPA and  
14 SEPA process are as follows:

15 First, combining streamlines the  
16 environmental review. Instead of taking a  
17 separate fragmented and sequential approach,  
18 Ecology and USDOE are anticipating folding their  
19 NEPA and SEPA requirements together and meeting  
20 them all upfront.

21 This will avoid duplicative and time  
22 consuming public reviews in the future.

23 Second, NEPA and SEPA are very similar  
24 in intent as well as process. The Washington  
25 State law was modeled after the federal law and

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1 has no differences which would prevent the two  
2 processes from being combined.

3 In fact, both laws encourage the  
4 integration with their counterparts. Ecology  
5 and USDOE believe that the combined effort will  
6 result in a better process for environmental  
7 review.

8 Third, in combining the documents,  
9 the two agencies expect to be able to save time  
10 and money. The two processes each require  
11 extensive public involvement, careful study and  
12 the preparation of several documents. By only  
13 doing these once, will clearly realize a  
14 savings.

15 Fourth, by working as equal  
16 partners, Ecology and USDOE must agree on  
17 everything in the EISSs. The two agencies will  
18 eliminate the possibility of debating over  
19 conflicting directions later on, and instead  
20 will identify and resolve differences early and  
21 cooperatively.

22 Finally, and most importantly,  
23 nothing is lost in this combined effort. Ecology  
24 and USDOE will continue to maintain full  
25 independent authority over their respective

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1 requirements.

2 This means both NEPA and SEPA must  
3 be completely followed to the satisfaction of  
4 each agency. Additionally, no part of either  
5 NEPA or SEPA will be sacrificed in this joint  
6 EIS -- or both of these EISs. Any information  
7 or opportunity for review or comment that NEPA  
8 or SEPA requires will be part of the combined  
9 process.

10 Now I will take you through what you  
11 will see in both of the EIS's.

12 The statement of purpose and need for  
13 action will explain the problem for which the  
14 proposed actions are being studied. In these  
15 cases, the purpose is the need to resolve tank  
16 safety issues.

17 The description of alternatives  
18 will describe the actions the agency is  
19 proposed to take and compare those actions with  
20 alternative means to resolve tank safety  
21 issues.

22 For these EISs, the preferred  
23 alternative will follow the processes laid out in  
24 the Tri-Party Agreement. Other alternatives will  
25 also be examined.

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1                   One reason why we are here is to  
2                   find out from you what alternatives we should  
3                   look at.

4                   Finally, the no action alternative is  
5                   required by both NEPA and SEPA as a way of  
6                   comparing the other alternatives to continuing  
7                   the present situation.

8                   The EIS will also describe the  
9                   environment which will be affected by all of the  
10                  alternatives. In these cases it will be a  
11                  description of the areas at the Hanford Site  
12                  where the TWRS activities would take place and  
13                  any parts of the environment beyond the Hanford  
14                  Site that may be impacted.

15                  In describing the environment, the  
16                  EISs will look at three aspects.

17                  First, the human environment, which  
18                  looks at such things as potentially impacted  
19                  populations and areas of historical significance.

20                  Second, the biological environment,  
21                  which looks at such things as potentially  
22                  impacted plants and animal species.

23                  And third, the physical environment,  
24                  which will describe such areas as geology and  
25                  ground and surface waters.

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1                   The third parts of the EISs will  
2                   examine the environmental impacts of the  
3                   proposed action and alternatives. This will  
4                   look at impacts to the human environment, such as  
5                   impacts on jobs and the disturbance of historic  
6                   areas.

7                   It will also look at potential  
8                   health risks from such things as radioactive  
9                   releases to both Hanford workers and the off-Site  
10                  public.

11                  The impacts section will thirdly look  
12                  at possible impacts of the ecosystem such as  
13                  endangering plant or animal species or  
14                  interfering with migrations.

15                  Finally, the EIS will exam methods  
16                  for mitigating or reducing the impacts of the  
17                  proposals and alternatives. These might include  
18                  such things as additional pollution control  
19                  devices, restoration of habitat, or changes in  
20                  the location of buildings.

21                  As with the alternatives, we are  
22                  here to hear your comments on what the analysis  
23                  of impacts to the environment should include,  
24                  and what possible mitigation measures should be  
25                  considered.

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1           To conclude my presentation, I will  
2 take you through the proposed schedule of the two  
3 EISs.

4           First, a Notice of Intent to prepare  
5 the EISs was published in the Federal Register  
6 and corresponding Washington State SEPA register  
7 on January 28th. Those notices began the scoping  
8 process for which we are holding this meeting.  
9 Comments on the scope of either EIS will be due  
10 March 15th.

11           At that time the path of the two EISs  
12 will split. For the New Tanks EIS, an  
13 Implementation Plan should be prepared by the two  
14 agencies by April 15th. The Implementation Plan  
15 will lay out the schedule for completion and  
16 scope of the New Tanks EIS.

17           The Draft EIS will follow in June at  
18 which time there will be a 45 day review and  
19 comment period. After that, the two agencies  
20 expect to have a Final EIS out by August of this  
21 year and a final decision by September.

22           The TWRS EIS Implementation Plan will  
23 be ready in June of this year, but will take  
24 until August of next year to assemble all of the  
25 information for the Draft EIS.

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1                   After a 45 day comment period, the  
2 final TWRS EIS should be ready by April of  
3 1996, with a final decision by May of that  
4 year.

5                   The two agencies hope, as a result of  
6 this combined process, to accelerate the TWRS EIS  
7 from the schedule I just laid out. If that is  
8 successful, a TWRS final decision could be made  
9 as soon as June of 1995.

10                  This concludes my portion of the  
11 presentation. If you have any questions about  
12 SEPA or NEPA, or the process the two agencies  
13 intend to use in preparing these EISs, please  
14 give me a call at 206-407-7112.

15                  Next will be Don Alexander of the  
16 Department of Energy, to describe the proposed  
17 Tank Waste Remediation System and the New Double  
18 Shelled tanks. Thank you.

19                  DR. DON ALEXANDER: Thank you,  
20 Geoff, and good evening.

21                  With an urgency in the 1940s to give  
22 the United States a weapons advantage, many of  
23 the actions were taken without consideration for  
24 the environment and were unregulated with respect  
25 to the environment.

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1           The massive legacy of those actions  
2           resulted in waste stored in 177 tanks, 68 of  
3           which are considered to be leaking, and others  
4           which have potential for leaking.

5           The National Environmental Policy  
6           Act was enacted in 1969 to assure that in the  
7           future any major federal proposed actions, such  
8           as a major construction project, especially those  
9           involving radioactive wastes, be analytically  
10          evaluated.

11          NEPA requires that the federal agency  
12          complete three types of analyses and weigh these  
13          in its decision-making process.

14          The first is an analysis of the  
15          environmental impacts of the proposed action.

16          The second is an analysis of the  
17          impacts of alternative design solutions to the  
18          proposed action.

19          And, finally, the proposed and  
20          alternative actions are to be compared to the  
21          environmental implications of taking no action.

22          The alternatives under discussion  
23          today have been presented to you in public  
24          meetings over the past year involving the  
25          Tri-Party Agreement. It was in that process that

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1 some were dismissed. Grout was a notable  
2 alternative among those dismissed.

3 Although the DOE had alternatives  
4 as announced in the HDW EIS as late as 1988,  
5 the TPA process was essential in aiding the  
6 Department in formulating the current proposed  
7 actions.

8 Once the Tri-Party Agreement was  
9 signed on January 25th of this year, the Notice  
10 of Intent was immediately issued for the proposed  
11 actions on January 28th.

12 In the next few moments I will give  
13 you an overview of the two proposed actions to  
14 be discussed in the meeting today, and I will  
15 tell you how you can contribute to this part of  
16 the process.

17 DOE and Ecology are recommending two  
18 proposed actions.

19 First, to construct six new waste  
20 storage tanks, and second, to retrieve, treat,  
21 immobilize, store and dispose of radioactive  
22 waste from 177 storage tanks.

23 The agencies request comments and  
24 recommendations from you for:

25 Alternatives to be analyzed; and

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1 Additional environmental issues that  
2 we should consider.

3 The proposed facilities are to be  
4 constructed in the 200 Areas, the area where I  
5 work.

6 The two proposed actions are:

7 First, to immediately remove  
8 radioactive waste contents from tanks with  
9 dangerous emissions of ignitable gas to safer  
10 storage, as shown on the left part of the  
11 slide;

12 And second, to permanently retrieve,  
13 treat, immobilize and safely store all tank  
14 wastes on an interim basis, until a permanent  
15 repository is available.

16 Next slide, please. The two  
17 preferred alternatives are embodied in the newly  
18 signed Tri-Party Agreement and are being  
19 implemented as we speak.

20 NEPA and SEPA will evaluate the  
21 preferred and reasonable alternatives and assess  
22 potential environmental consequences.

23 Environmental consequences will be  
24 considered with safety concerns, costs,  
25 schedules, and public review.

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1           If the environmental consequences  
2 outweigh other considerations, then the DOE,  
3 Ecology, and the EPA could revise specific  
4 milestones, but not the end date of the TPA  
5 2028.

6           DOE and Ecology are committed to full  
7 compliance with the TPA.

8           In the Tri-Party Agreement we agree  
9 to build six tanks to eliminate immediate safety  
10 concerns.

11           This is a schematic of a proposed  
12 tank with modern safety controls, including mixer  
13 and retrieval pumps to reduce gas build-up,  
14 liquid and gas sampling systems, improved  
15 ventilation systems, and improved tank integrity  
16 monitoring.

17           For this proposed action, then, the  
18 Tri-Party Agreement defines that we would  
19 construct six new tanks.

20           We are required by law to evaluate  
21 other alternatives, as Geoff and I have both  
22 said, to assure that we have adequately  
23 considered environmental impacts. One potential  
24 alternative is to construct fewer tanks, and rely  
25 on other methods to mitigate safety issues.

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1                   If we were to choose no action, we  
2 would not mitigate or resolve safety issues. As  
3 I said earlier, this alternative is required by  
4 law.

5                   We would like to receive your oral or  
6 written comments on other alternatives to this  
7 proposed action.

8                   This is a schematic of the two  
9 tanks and the supporting facilities proposed for  
10 the 200 West Area. A similar conceptual design  
11 has been prepared for the four tanks that would  
12 be found in the eastern area. Notice that the  
13 costs of this construction involve not only the  
14 tanks themselves but the necessary support  
15 facilities that support them.

16                  Next slide. Now I would like to  
17 give you an overview of the second proposed  
18 action.

19                  In this action we upgrade our current  
20 storage for safety reasons, we retrieve from the  
21 177 tanks, treat, immobilize, store and safely  
22 dispose of all of the waste.

23                  Next slide, please. We are  
24 required by law to evaluate the consequences of  
25 leaving the wastes where they are so we can

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1 determine the benefit of taking the proposed  
2 action. We have agreed with the State and EPA  
3 to retrieve all of the waste by sluicing,  
4 provide minimum pretreatment of wastes, vitrify  
5 high-level wastes, and vitrify low-level  
6 wastes.

7 Although we prefer to retrieve waste  
8 by hydraulic sluicing, we have also identified  
9 two additional alternatives for comparison of  
10 environmental impacts; pneumatic retrieval, and  
11 mechanical retrieval.

12 We prefer minimal pretreatment, but  
13 we also recognize two additional alternatives  
14 for comparing environmental impacts. These  
15 include no pretreatment, and extensive  
16 pretreatment.

17 For immobilization of high-level  
18 waste we agree to vitrification.

19 Calcination is an alternative for  
20 comparison of environmental impacts.

21 And for low activity wastes, we  
22 prefer vitrification, but we will consider other  
23 solid waste forms, again, for comparison of  
24 environmental impacts.

25 We request that you provide other

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1 alternatives through oral or written comments  
2 before March 15th.

3 Environmental issues need to be  
4 evaluated for the proposed action as required by  
5 NEPA, and SEPA, including:

6 Effects of releases on the public  
7 and on-site workers from operations and  
8 accidents;

9 The effects on air and water quality,  
10 and other environmental consequences from  
11 operations and accidents;

12 Effects on endangered species,  
13 archaeological, and historical sites;

14 Unavoidable environmental impacts;  
15 Cumulative effects of all of the  
16 above;

17 Effects from transportation;

18 Effects of future decommissioning  
19 decisions;

20 Socio-economic impacts on the  
21 surrounding communities, like the one that I live  
22 in;

23 Short-term use of the environment  
24 versus long-term productivity;

25 Pollution prevention and waste

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1 minimization;

2 Unavoidable adverse environmental  
3 impacts;

4 Irretrievable and irreversible  
5 commitments of resources.

6 And, again, we request that you  
7 provide other alternatives through oral or  
8 written comments before March 15th.

9 Next slide. In summary, then, the  
10 DOE and Ecology are recommending two proposed  
11 actions.

12 Construct six new storage tanks.

13 And, secondly, retrieve, treat,  
14 immobilize, store, and dispose of the waste from  
15 177 storage tanks.

16 The agencies are requesting comments  
17 and recommendations from you for alternatives to  
18 be analyzed and additional environmental issues  
19 to be considered.

20 Thank you.

21 MS. ALINDA PAGE: Thank you. Mr.

22 Tallent and Dr. Alexander will be sitting up here  
23 during the remainder of the meeting, listening to  
24 your comments.

25 Because this is a formal scoping

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1 hearing, they will not be engaging with you in  
2 conversation, except to ask clarifying questions  
3 to make sure that they understand the purpose of  
4 your comments.

5 If you do have questions that you  
6 wish to ask, there are people from the two  
7 Departments as well as Westinghouse in a room  
8 right outside this door that are available to  
9 talk with you about the procedures and their  
10 intentions related to the Environmental Impact  
11 Statements.

12 You do need to be aware, however,  
13 that only the comments that you make here at  
14 the microphone are going to be transcribed by  
15 the court reporter and included in the transcript  
16 which will constitute the record for this  
17 meeting.

18 Therefore, if you address any issues  
19 during any informal conversations that you want  
20 considered in the Draft EIS, you need to come  
21 forward to the mike and repeat those issues and  
22 concerns in this formal process.

23 I encourage those of you who will  
24 be speaking today to provide me with written  
25 versions of your oral comments. If you have a

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1 transcript of your oral comments or if you have  
2 prepared a written document that you would like  
3 that will supplement your oral comments, please  
4 give it to me and we will enter it into the  
5 record. Documents submitted today are formally  
6 accepted into the record for the meeting and will  
7 be given the same consideration as the oral  
8 comments that are heard.

9 If you are not ready to make comments  
10 orally or you are uncomfortable getting up in  
11 front of people to speak, there is a comment form  
12 that's been prepared and is available for you in  
13 the back of the room. You may also submit  
14 comments on any kind of form that you have  
15 available. The names of Mr. Tallent and Dr.  
16 Alexander are on that form also at the  
17 registration desk and the address to which you  
18 must mail the comments.

19 Written comments must be postmarked  
20 by March 15th, 1994, to assure their use in the  
21 preparation of the Environmental Impact  
22 Statements. Comments received after that date  
23 will be accommodated as practical.

24 Written comments will be given the  
25 same level of consideration by the Department of

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1 Energy and Ecology as formal comments that are  
2 received at the scoping meeting.

3 Now I would like to take just a  
4 moment or two to go over the procedures that we  
5 will be using for the oral comments for today's  
6 meeting.

7 We have pre-registered speakers,  
8 people who signed up in advance of this meeting  
9 to speak, and indicated a time at which they  
10 wished to be called on. So as close as possible  
11 to those requested times, I will call on the  
12 pre-registered speakers.

13 In addition, some of you have  
14 probably signed up to speak as you got here  
15 today. And I'll call on those of you who signed  
16 up today in the order in which you signed up. If  
17 you are out of the room and missed the call,  
18 don't worry, we'll call you again, until you  
19 finally get a chance to talk.

20 The people who wish to comment  
21 today will be given five minutes each. And I  
22 have a stop watch and I'll be jumping up and down  
23 in front of you if you go over the five minute  
24 period. Organizations, people who are  
25 representing organizations and are the official

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1 representative of an organization, will be given  
2 ten minutes. So it's important that you indicate  
3 that you are official spokespeople for  
4 organizations and you expect to speak for ten  
5 minutes, if that's your circumstance.

6 I will not limit the comment of any  
7 -- the content of any of the statements that you  
8 make today, but I would like to ask you to keep  
9 your comments to the scoping of these two  
10 Environmental Impact Statements.

11 And, finally, I want to introduce  
12 our court reporter, Bill Bridges, who is  
13 transcribing verbatim the formal comment portion  
14 of today's meeting. In order to help him prepare  
15 a complete and accurate record, I would like to  
16 ask that you come forward to this mike, before  
17 you begin your comments, that you say your name  
18 and that you give your address. It would help  
19 also if you would spell your name and be quite  
20 clear about your mailing address.

21 We'll now begin the formal comment  
22 period for today's meeting. And the first  
23 pre-registered speaker is Mr. Gordon Rogers.  
24 After Mr. Rogers is Larry Penberthy. And after  
25 Mr. Penberthy, Cindy Sarthou.

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1 MR. GORDON ROGERS: I am Gordon  
2 Rogers, R-o-g-e-r-s. I live at 1108 North Road  
3 36 in Pasco. My brief comments today are on  
4 behalf of myself as a private citizen and  
5 taxpayer, and not for any organization or  
6 business.

7 I expect to provide more detailed  
8 written comments at a later time, before the  
9 deadline.

10 I applaud the efforts of DOE and  
11 the Department of Ecology in attempting to  
12 streamline the paperwork process which must  
13 proceed activities such as we're concerned with  
14 here. However, I am disappointed that the  
15 Environmental Protection Agency isn't likewise  
16 involved.

17 This is a good start, but it's far  
18 from a realistic approach to decreasing the  
19 incredible paperwork maze that exists in front of  
20 any realistic action.

21 I myself presented comments for the  
22 first, quote, Final Hanford Defense Waste Cleanup  
23 EIS in 1987. Six years later, or is it seven, we  
24 are still fiddling around with EISs, and in the  
25 case of the TWRS EIS, we must wait another couple

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1 of years to see it.

2 I'm a little confused as to whether  
3 realistic work can go on in the meantime. And I  
4 think it must go on before these EISs are  
5 completed through the required process.

6 So to summarize my point there,  
7 simplification of the paperwork and close  
8 involvement of the EIS -- of the EPA in the  
9 overall required paperwork is essential.

10 I recognize that USDOE and Ecology  
11 cannot do this by themselves, but I would urge  
12 them, together with EPA, to attempt to cause the  
13 Congress to review as part of their duties the  
14 regulatory hurdles that they have erected which  
15 have a major impact in preventing prompt progress  
16 on the cleanup.

17 With respect to the TWRS package,  
18 I'm a bit confused by the statement that you  
19 will proceed according to the Tri-Party  
20 Agreement which lays out a preferred  
21 alternative, but at the same time analyze some  
22 alternatives.

23 I think that you must analyze these  
24 alternatives and revisit several issues that  
25 apparently have been settled by public comments

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1 over the past few years.

2 In particular, I think it important  
3 that decisions such as the form of the  
4 low-level fraction of the tank waste to adopt a  
5 vitrification scheme rather than the old grout  
6 concept be carefully considered and documentation  
7 be made available to the public and all  
8 interested parties, because from information I  
9 have, it strikes me that the grout was a  
10 technically acceptable scheme for protection of  
11 the environment, and apparently could do so at  
12 greatly reduced cost.

13 There is another similar issue that  
14 goes back to the original Defense Waste EIS, and  
15 that is in-situ disposal for the waste in the old  
16 tanks.

17 After the drainable liquids have been  
18 removed, I think -- well, I personally would very  
19 much appreciate seeing a realistic evaluation of  
20 the impacts of filling the remaining tank with  
21 gravel and other materials to prevent further  
22 water evolution and disposing of the tank and its  
23 remaining solid contents in-place without further  
24 treatment.

25 It may not be suitable for all tanks,

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1 but I suspect for a large number of them, this  
2 would be an environmentally acceptable course of  
3 action.

4 I think I will conclude my comments.  
5 Thank you very much.

6 Do you have any clarifying  
7 questions?

8 MR. GEOFF TALLENT: No.

9 MR. GORDON ROGERS: Thank you.

10 MS. ALINDA PAGE: Mr. Larry  
11 Penberthy.

12 MR. LARRY Penberthy: Good

13 afternoon. My name is Larry Penberthy, President  
14 of Penberthy Electromelt Company. I am here  
15 today, however, as a representative of Paul  
16 Revere Organization, which is a duly registered  
17 organization with this state. We have a  
18 registration number from them.

19 Now, the function of the Paul  
20 Revere organization is to alert the public to  
21 dangers. We derived the name from the  
22 Lexington and Concord days of the American  
23 Revolution. We are putting it in the modern  
24 setting.

25 However, here is now a case.

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1 Building six new tanks. What does that really  
2 do?

3 I think it should be listed as a do  
4 nothing option, because all you're doing is  
5 taking the material out of one tank and put it in  
6 another tank, and nothing has been accomplished  
7 thereby.

8 Now, instead of that, I have another  
9 proposal. You see, those six tanks are going to  
10 cost 436 million dollars. And that is a lot of  
11 money.

12 Now, what can you do with that,  
13 instead of that?

14 One is to pump the tanks out, that  
15 is, the liquids, and we have several phases of  
16 what needs to be done. One is the liquids, the  
17 thought being that you don't have a leaky tank if  
18 there is no liquid to leak.

19 The other is to retrieve the  
20 saltcakes which have precipitated. And those are  
21 mostly soluble. And then below that will be a  
22 hydroxide sludge layer, which is a different kind  
23 of a problem. There is where a lot of the  
24 radioactivity is, except for the cesium, which  
25 will all be in the -- nearly all be in the

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1 liquids.

2 Now, we can build a 50 ton a day  
3 furnace using sodium nitrate from the liquid,  
4 it's a saturated solution, and from the saltcake  
5 layer, we can take the liquids from there and  
6 make them into glass, ordinary glass, container  
7 glass, has something like 15 percent sodium  
8 oxide. You break the sodium nitrate down to  
9 sodium oxide and alumina, by addition of aluminum  
10 powder. You want the alumina. It's very good  
11 for making glass.

12 The point now is that this 50 ton per  
13 day tank will consume 10,000 gallons a day of  
14 this saturated sodium nitrate solution. A little  
15 arithmetic there. In 50 days, you are taking  
16 500,000 gallons of liquid. So every 50 days you  
17 can empty all the liquid portion out of the  
18 tanks. And by that method, in 300 days, you will  
19 have emptied six tanks.

20 You don't need to build any new  
21 tanks, totally superfluous, there's plenty of  
22 tankage if we go to solidification of the  
23 liquids.

24 Now, this is an economic process.  
25 The cost for building one of the furnaces, and

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1       siting it, is around 140 million dollars. The  
2       furnace itself is far less than that.

3               But will you please put on the top  
4       slide there.

5               We have been building, my company  
6       now, and I am speaking for that, has been  
7       building furnaces for a very long time. And this  
8       is the kind of a furnace --

9               Sorry. This is the location. Would  
10       you please change to the other slide. I have  
11       only two.

12              Now, the credentials of this kind of  
13       furnace are very, very good. The Cornelius  
14       furnace had a batch blanket. The batch blanket  
15       captures by reflux condensing any of the  
16       vaporizable materials, including sodium and  
17       cesium and boron and lead oxide, cadmium,  
18       selenium, a whole bunch of them, do have some  
19       vapor pressure. And the batch blanket has been  
20       proven conclusively over the past 60 years to  
21       function to capture the volatiles.

22              Now, Cornelius invented the batch  
23       blanket furnace and built the first one in  
24       1932. It ran for 24 years. That was in  
25       Sweden. He sold one of his furnaces in '46 to

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1 Northwest Glass Company, Northwestern Glass  
2 Company, in Seattle. And they used the iron  
3 electrodes that Cornelius had been using, caused  
4 trouble, used graphite electrodes, which caused  
5 other troubles.

6 And I came along in 1950 and  
7 converted them by adding moly electrodes, which  
8 are my patented invention. My patent has long  
9 since run out. But nonetheless, that cured all  
10 of the problems.

11 Now, that furnace, that particular  
12 furnace, it's got a name, B Furnace, at North-  
13 western Glass in Seattle, has been running at 30,  
14 32 tons a day ever since.

15 Now, that's a long time and that's  
16 a lot of glass. So we do have the history. When  
17 I say we can build a 50 ton furnace for waste,  
18 sure, we can build it in about eight months  
19 and then it will start operating to empty the  
20 tanks.

21 Now, we do have this history, you  
22 see. We're not talking blue sky, and we're not  
23 talking hopes.

24 Will you please put on the other  
25 slide.

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1                   Now, where are you going to put this  
2                   furnace? One of the ways is to put it in a  
3                   building, which is a colossal failure, as the  
4                   Hanford Waste Vitrification Project has shown  
5                   you, they have spent an awful lot of money, I  
6                   have heard 400 million and another place 800  
7                   million dollars that they spent, and the ground  
8                   wasn't even broken yet.

9                   Choose your own figure, it was way  
10                  too much because the concept was flawed.

11                  Now, if you really want to do a  
12                  good job on a furnace, you put it in a pit out  
13                  at the site, 200 Area, and that's about 30 feet  
14                  deep, might be 60 feet square or 40 feet  
15                  square, it doesn't matter what, for the costs  
16                  of the building of it. The walls are concrete.  
17                  They slant outwardly. And around the parapet  
18                  there are operator stations. There's six of them  
19                  located around. You'll see on the upper left,  
20                  the operator's window, that's a lead glass  
21                  window.

22                  As a part of my credentials for  
23                  speaking, I'm the inventor of the lead glass that  
24                  was used, that is used for radiation shielding  
25                  windows. Penberthy high D lead glass first

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1 delivered to Hanford in 1950.

2 Then the concept here is very  
3 simple. In 1980 we were given a contract by  
4 the Department of Energy to build, design,  
5 build and demonstrate a six ton a day furnace for  
6 the West Valley Project. And we built it in  
7 about nine months. And it used the system shown  
8 here.

9 We brought in the solids that it  
10 would be, the silica, the limestone, to be  
11 combined with a soda which comes in in liquid  
12 form. You will see the arrow there which says  
13 liquid feed. The mixing takes place only near  
14 the drop into the furnace. Now, we run this  
15 furnace, it ran for six weeks, we melted 220 tons  
16 of glass to demonstrate it.

17 And it worked perfectly, according to  
18 what we already knew it would.

19 Then there was no problem of the  
20 mixing of fritz or anything like that. You had  
21 simple ingredients. The ingredients of silica  
22 and the alumina and alumina iron can come from  
23 the Hanford contaminated soils, if you like.

24 We made quite a bit of glass in  
25 1974, we demonstrated for Battelle, the combining

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1 of sodium nitrate, sodium oxide, and the Hanford  
2 soil, which they shipped over in drums, we ran  
3 that through, I forget how much, a ton or two  
4 of it, to prove the concept. It worked just  
5 fine.

6 Now, what I am saying is, that this  
7 is a very effective alternative and that it would  
8 be a distinct mistake for Hanford to go ahead  
9 with the project where there's only one solution  
10 which is temporizing in nature, and that is to  
11 build more tanks.

12 This will be criticized severely by  
13 the public as doing nothing, and the former  
14 administrator of the EPA, Riley, said in an  
15 article, that if that's all that can be done,  
16 they might as well reduce Hanford's mission to  
17 guarding a fence.

18 So there is something that can be  
19 done. The vitrification is permanent and  
20 stable. The place that the glass goes after  
21 it's vitrified is into the four empty grout  
22 vaults, which were built, and now have no  
23 mission.

24 The transporting of that is very easy  
25 to do. The glass is cast into one ton content

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1 containers, steel containers, or else-wrought iron  
2 casks, and then transported by shielded  
3 containers to the grout log.

4 I don't know how far away they are.  
5 Maybe they could be transported in a subway, as  
6 it were, where it's just a trench six feet deep  
7 in the ground and five feet wide, concrete lined,  
8 so that the canisters of glass, anyway, the  
9 containers of glass are never brought to the  
10 surface, they are all brought up out of the tank  
11 this way.

12 So what I'm saying is there is the  
13 public perception that something needs to be  
14 done, Congress' perception that there is an awful  
15 lot of money being wasted here, and that they are  
16 going to cut off the funds unless there is  
17 visible progress. So I urge you then to consider  
18 another system which can get things done in a  
19 permanent way.

20 One last sentence on cesium.  
21 Cesium is not a long-term problem. It decays  
22 half every 30 years. And so if you have  
23 another 200 years, that's roughly seven half  
24 lives, and the cesium is down to low-level.  
25 Thank you.

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1 MS. ALINDA PAGE: Cindy  
2 Sarthou.

3 MS. CYNTHIA SARTHOU: I am  
4 Cynthia Sarthou. I represent Heart of America  
5 Northwest in Seattle, Washington. And I'm here  
6 to comment on this scoping EIS. Actually, I have  
7 some concerns over it.

8 My concern really lies with the  
9 repeated reference in the EIS that USDOE will  
10 address proposals for the management,  
11 treatment, storage and disposal of waste  
12 currently stored in the existing single-shell  
13 and double shell tanks and other wastes to be  
14 generated.

15 My concern lies in the fact that  
16 this would appear to indicate that you will  
17 look at all of the options for management,  
18 treatment, storage and disposal, yet this was  
19 the subject of six months of negotiations  
20 between USDOE, EPA and the State Department of  
21 Ecology.

22 If USDOE thought an EIS was necessary  
23 in order to reach these initial decisions, it  
24 should have done the EIS as part of the  
25 rebaselining effort and prior to the date of

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1 signature to EPA.

2 As you well know, a tank waste task  
3 force was established to provide input on the  
4 proposed rebaselining effort by USDOE. That  
5 central message from that group was the need to  
6 get on with the cleanup. Through the input of  
7 this group the TPA negotiators were able to  
8 negotiate an agreement which, although far from  
9 perfect, established a schedule or scheme for the  
10 management, treatment, storage and disposal of  
11 the waste currently stored at Hanford.

12 Within the Notice of Intent, USDOE  
13 states continually that a number of alternatives  
14 can be constructed, that a number of alternatives  
15 will be considered and that the TPA establishes a  
16 specific case within a range of alternatives and  
17 that this is considered only the preferred  
18 alternative, but that USDOE is considering all  
19 sorts of alternatives other than that stated in  
20 the Tri-Party Agreement.

21 Given the recent completion of six  
22 months of negotiation and the execution of the  
23 Tri-Party Agreement, the USDOE's insistence upon  
24 the completion of a full EIS, considering all  
25 alternatives, is in this instance nothing more

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1 than what appears to be a selective use of NEPA  
2 to avoid the requirement for action.

3 This conclusion is bolstered in my  
4 opinion by the fact that it is anticipated that  
5 the EIS will not be completed until  
6 approximately October of 1996, and that no  
7 action which would prejudice the ultimate  
8 selection of alternatives will be taken before  
9 that date.

10 This is despite the fact that many  
11 initial activities such as submission of designs  
12 for low-level pretreatment facilities are  
13 necessary for implementation of the TWRS program  
14 are to be submitted prior to that date.

15 Similarly, with regard to the tank  
16 EIS, it is stated that the EIS will be completed  
17 by September of 1994, yet two tanks are required  
18 to be completed by 1997 and four more by 1998.

19 If USDOE strictly follows of the  
20 mandates of NEPA as it is stated in its Notice of  
21 Intent, it will take no action until the  
22 completion of the EIS.

23 Thus construction of the new tanks  
24 could not even begin until after September of  
25 1994. USDOE has yet to build anything as

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1 substantial as six double-shell tanks within four  
2 years.

3 It is my fear that the statements of  
4 USDOE in its Notice of Intent ignore the binding  
5 nature of the Tri-Party Agreement. It is simply  
6 not appropriate at this juncture to attempt to  
7 revisit, renegotiate and/or stall implementation  
8 of the Tri-Party Agreement under the guise of  
9 NEPA compliance.

10 For example, in response to public  
11 comment during TPA negotiations, the grout  
12 program was dropped from consideration as a  
13 viable alternative. Yet the Notice of Intent  
14 raises this issue again, stating that DOE would  
15 maintain in a standby position the grout facility  
16 if its operation is necessary before new  
17 double-shelled tanks are available, to avoid  
18 safety problems.

19 The Notice of Intent also includes  
20 cement polymer based grout, and glass cullit in  
21 sulfur cement, as alternatives for low activity  
22 waste stabilization.

23 The public made it clear during the  
24 TWRS renegotiation that it does not consider  
25 grout in any form an acceptable alternative.

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1 And it stated so repeatedly during the hearings  
2 on the TPA renegotiations. Grout simply should  
3 not be considered as an alternative within this  
4 EIS.

5 Furthermore, the use of grout to  
6 resolve any but the most serious of safety issues  
7 posing an immediate threat or constituting a true  
8 emergency is unacceptable.

9 I am pleased that for once USDOE  
10 has voluntarily agreed to comply with NEPA.  
11 However, this EIS should not be used as an  
12 excuse not to comply with the Tri-Party  
13 Agreement. It should be limited to a  
14 consideration of the potential environmental  
15 impacts arising from the activities called for in  
16 the Tri-Party Agreement and the manner in which  
17 those potential impacts can be avoided and/or  
18 mitigated.

19 Consideration of all alternatives  
20 despite USDOE's statement in its Notice of Intent  
21 is not necessary or appropriate at this juncture,  
22 especially in light of the execution of the  
23 Tri-Party Agreement January 25th, prior to the  
24 date this Notice of Intent was issued.

25 In any event, it is imperative that

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1 USDOE complete this process quickly and comply  
2 with the concern voiced by the Tank Waste Task  
3 Force, namely, USDOE must get on with the  
4 cleanup. Thank you.

5 MS. ALINDA PAGE: Those are the  
6 only three speakers that I have registered as  
7 wishing to make comments. Are there others of  
8 you in the audience?

9 Okay. We will need to have your name  
10 and address something.

11 MR. SCOTT COLBY: My name is  
12 Scott Colby and I am representing myself. I  
13 would like to just read my statement.

14 MS. ALINDA PAGE: Spell your  
15 name.

16 MR. SCOTT COLBY: I have it all  
17 provided in my written statement.

18 The efforts by the Department of  
19 Energy to implement the Environmental Impact  
20 Statement process for Hanford Site tank wastes is  
21 encouraging and necessary. However, the  
22 strategy's scope does not go far enough.

23 The current EIS strategy does not  
24 include closure of the waste tanks and it does  
25 not clearly include the interrelationship

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1 between tank waste and the other contaminated  
2 areas.

3 I would like to speak to tank  
4 closure and the interrelationships  
5 specifically.

6 The current EIS strategy assumes  
7 that meaningful decisions can be made about  
8 tank waste storage, retrieval, and treatment,  
9 without considering the final closure of the  
10 tanks.

11 The EIS strategy is approaching the  
12 problem backwards by trying to determine how to  
13 produce something without first knowing what the  
14 production goal is.

15 Tank waste closure is the final goal  
16 and cannot be ignored in developing waste  
17 storage, retrieval, and treatment strategies.

18 Secondly, the EIS strategy assumes  
19 that meaningful tank waste cleanup decisions  
20 can be made without considering the inter-  
21 relationship with the other contaminated areas in  
22 the site.

23 The tank waste disposal is only  
24 part of the cleanup effort. Environmental  
25 remediation, decommissioning, decontamination,

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1 etc., are also occurring and due to location of  
2 the contamination, are deeply related to tank  
3 waste cleanup. The environment doesn't know  
4 the difference between ground contamination from  
5 radioactive cesium originating from tanks  
6 compared to injection cribs or leaking low-level  
7 waste drums.

8 Also, perspective is gained from a  
9 holistic EIS strategy and priorities are better  
10 defined. It doesn't matter if tank waste  
11 disposal restricts releases to the environment to  
12 near zero if a nearby crib has contamination  
13 releases many times higher.

14 Also, priorities are better achieved.  
15 For example, even though half the radioactivity  
16 on the Hanford Site is not contained in the  
17 tanks, a much larger part of the cleanup budget  
18 is devoted to cleaning up tank waste. A  
19 site-wide EIS can better determine what should be  
20 cleaned up first and can better determine the  
21 level of cleanup that is realistic.

22 There are several justifications  
23 for the current EIS strategy and DOE assuredly  
24 has an in-depth understanding of the many issues  
25 that can justify the limited scope of the current

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1 EIS.

2 These issues may include resource  
3 limitations, schedule limitations, oversized  
4 scope, legal dead-lock, and political  
5 correctness.

6 I would like to go through each one  
7 of those in detail.

8 Resource limitations. Currently  
9 the DOE spends around two million dollars per day  
10 on managing tank waste alone. Approximately  
11 eight million dollars a day is spent on the  
12 Hanford Site. How much money is needed to  
13 produce a comprehensive cleanup strategy that  
14 includes a cradle to grave philosophy and  
15 includes all the contaminated areas on the  
16 Hanford Site?

17 Schedule. Not having enough time  
18 to do it right but having the time to do it  
19 over during the next administration depicts the  
20 Hanford Site's track record for the last several  
21 years.

22 In the last year the Hanford Site's  
23 low- and high-level tank waste disposal  
24 strategies were moth-balled after more than ten  
25 years of planning, scheduling and more than 500

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1 million dollars worth of spending. Schedules are  
2 not intended to create or choose acceptable  
3 strategies. Schedules are intended to ensure  
4 acceptable strategies are implemented.

5 Scope. Clearly the Hanford Site is  
6 riddled with complex issues that encompass  
7 technical, economic and political challenges.  
8 Piecemealing the cleanup may make near-term  
9 decision making easier but unfortunately it  
10 merely delays the decisions that really drive  
11 cleanup into the next administration. Limiting  
12 the scope renders decisions that are inadequate  
13 due to the lack of depth in scope.

14 Legal issues. The legal issues  
15 surrounding Hanford cleanup encompass the site  
16 owners and the site's hazardous waste regulators.  
17 The current piecemeal EIS strategy may be driven  
18 by the legal entities. I am certain that these  
19 laws are intended to drive cleanup and not stop  
20 it. Some believe that the laws, however good  
21 intended, have become so complex and restrictive,  
22 that a comprehensive cleanup strategy is  
23 unrealistic.

24 And, finally, political  
25 correctness. Complying with the bounds of

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1 political correctness has put increasing pressure  
2 upon government entities. Controversial  
3 decisions are bound to disgruntle societal groups  
4 and oftentimes no decision is better than any of  
5 the alternatives. Except in this case, the  
6 environment and taxpayers are ultimately paying  
7 the bill.

8 And I would like to close with that  
9 I'm confident that the Department of Energy has a  
10 firm rationale for justification for the current  
11 EIS strategy that does not provide a  
12 comprehensive cleanup strategy, and that through  
13 this preview process the public will have the  
14 opportunity to better understand the issues that  
15 have been weighed and challenged to ultimately  
16 propose the current strategy.

17 I realize that Perfect solutions  
18 don't exist in an imperfect world, but I do ask  
19 that the issues driving the current EIS strategy  
20 be more completely presented to the public.

21 Thank you.

22 MS. ALINDA PAGE: Thank you.

23 We have received the comments from Mr. Colby as  
24 Exhibit Number 1. And that's C-o-l-b-y.

25 Is there anyone else who came here

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1 with the intention of making formal comments?  
2 Anyone who didn't come here with the intention  
3 but now has the desire?

4 Okay. Mr. Penberthy?

5 MR. LARRY PENBERTHY: I have a  
6 question.

7 MS. ALINDA PAGE: You need to  
8 come to the mike if you want it on the record.

9 MR. LARRY PENBERTHY: I have a  
10 question directed to these slides. Larry  
11 Penberthy. I have a question directed to the  
12 slides which you showed in making your  
13 presentation of the problem.

14 One of them, items, was minimum  
15 pretreatment, or minimal pretreatment. And then  
16 I understand that this is not -- this is in  
17 conflict with what I heard Friday, that there is  
18 a contract for a 235 million dollar pretreatment  
19 plan, which is expected to take the cesium  
20 content down by a factor of 10 to the 4th.

21 Now, what's the plan? Is it going to  
22 be minimal pretreatment or is it going to be this  
23 pretreatment plant which will do such a superb  
24 job, more than necessary, far more than minimal?  
25 Can you tell me which you refer to when you had

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1 on this slide, minimal pretreatment? Is that the  
2 plan that's going to be implemented?

3 DR. DONALD ALEXANDER: In the  
4 NEPA process, we have to evaluate a full range  
5 of environmental impacts that could result from  
6 a range of actions. And so the environmental  
7 analysis that we're talking about today would  
8 look at the impacts on one extreme that would  
9 look at minimum pretreatment, which would  
10 include things like sludge washing, and on the  
11 other extent, we would look at the full  
12 benefits, and the downside to doing an  
13 extensive pretreatment analysis.

14 So we're looking at both of those  
15 in the EIS. But the TPA negotiation defines  
16 the preferred alternative.

17 MR. LARRY PENBERTHY: Do I  
18 understand that you're going ahead with this  
19 pretreatment plan, the extensive one, very  
20 expensive one, two hundred million, before  
21 there's an EIS?

22 DR. DON ALEXANDER: The answer  
23 is that, as I understand it, that is a proposal  
24 that's been forwarded to the Department for its  
25 consideration.

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1 MR. LARRY PENBERTHY: All  
2 right. Then I heard it simply that it had  
3 already been awarded.

4 DR. DON ALEXANDER: As far as I  
5 know, it's only in the consideration stage.

6 MR. LARRY PENBERTHY: Thank  
7 you.

8 MS. ALINDA PAGE: If there is  
9 no one else that wishes to comment at this  
10 time, we will recess this hearing until someone  
11 arrives who wishes to comment. And I don't  
12 know when that will be. But we will be  
13 standing by.

14 And in the meantime, if any of you  
15 have further questions you would like to ask  
16 informally of the representatives from the two  
17 agencies, or Westinghouse, we would encourage  
18 you to do that.

19 Perhaps I should introduce, Toby,  
20 do you want to raise your hand? And Geoff  
21 Bracken is also here to answer your questions.

22 So this hearing will be recessed  
23 for at least a half an hour, maybe longer.

24 (Recessed at 2:05 p.m.)

25 (Reopened at 4:30 p.m.)

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MS. ALINDA PAGE: It is 4:30 in  
the afternoon, and we will now take a dinner  
break until 6:30 p.m.

(Recessed at 4:30 p.m.)

\* \* \*

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1 (Reopened at 6:30 p.m.)

2 MS. ALINDA PAGE: Good evening.

3 I would like to welcome you here and reopen the  
4 public hearing that has been -- or public meeting  
5 that has been going on since 1:30, off and on  
6 since 1:30 this afternoon.

7 Welcome on behalf of the U.S.

8 Department of Energy and the Washington State  
9 Department of Ecology.

10 Today's scoping meeting is officially  
11 designated as the Richland public scoping meeting  
12 for the two proposed Environmental Impact  
13 Statements at the Hanford Site, Richland,  
14 Washington.

15 One EIS will address the proposed  
16 Tank Waste Remediation System activities, and the  
17 second will address the proposed construction of  
18 six new safety tanks for the storage of high-  
19 level radioactive waste as an interim action to  
20 the Tank Waste Remediation System Environmental  
21 Impact Statement.

22 This meeting is being held on the  
23 14th day of February, 1994, at the Hanford House  
24 in Richland, Washington, and we are reopening the  
25 evening session at 6:30 p.m.

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1 Today's meeting is the first of five  
2 being held in Washington and Oregon during the  
3 month of February.

4 The schedule this evening is that  
5 we will begin now at 6:30. About seven we will  
6 open the meeting to public comment, and we will  
7 remain available for public comment until ten  
8 p.m. tonight.

9 My name is Alinda Page, and I am a  
10 professional facilitator hired on contract. I  
11 work with Triangle Associates, which is based in  
12 Seattle, Washington.

13 I have been asked by the Department  
14 of Energy and the Washington State Department of  
15 Ecology to conduct this scoping meeting to ensure  
16 that all individuals and organizations here today  
17 who wish to comment on the scope of the upcoming  
18 Environmental Impact Statement have a fair and  
19 equal opportunity to do so, in keeping with both  
20 the letter and the spirit of the National  
21 Environmental Policy Act and the State  
22 Environmental Policy Act.

23 The National Environmental Policy Act  
24 of 1969, commonly referred to as NEPA, requires  
25 that any federal agency proposing an action that

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1 might have impacts on the environment evaluate  
2 all reasonable alternatives and their potential  
3 environmental impacts before taking such  
4 action.

5 When the projected environmental  
6 impacts might be considered significant, an  
7 Environmental Impact Statement must be  
8 prepared.

9 NEPA also requires that the public  
10 be provided opportunities to comment during  
11 preparation of the Environmental Impact  
12 Statement.

13 The Washington State Environmental  
14 Policy Act, commonly referred to as SEPA, is very  
15 similar to NEPA in its intent and purpose. Like  
16 NEPA, SEPA requires any state agency proposing an  
17 action that might have impacts on the environment  
18 to evaluate all reasonable alternatives and their  
19 potential environmental impacts before taking  
20 action.

21 The potential Washington State action  
22 in the remediation of the high level tank wastes  
23 and the construction of six new safety tanks  
24 would be the issuance of required Washington  
25 State environmental permits and authorizations,

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1 if the determination is made to proceed with the  
2 proposed action.

3 As with NEPA, when the projected  
4 environmental impact might be considered  
5 significant, an Environmental Impact Statement  
6 must be prepared. SEPA also requires that the  
7 public be provided opportunities to comment  
8 during the preparation of the Washington State  
9 Environmental Impact Statement.

10 Because the National Environmental  
11 Policy Act and the Washington State  
12 Environmental Policy Act are very compatible in  
13 their purpose, intent and procedures, the State  
14 of Washington Department of Ecology and the  
15 United States Department of Energy have decided  
16 to prepare one Environmental Impact Statement for  
17 each of the two proposed actions addressing the  
18 requirements of both SEPA and NEPA in a single  
19 document.

20 That is, a single EIS will address  
21 the Tank Waste Remediation issues and a single,  
22 yet different EIS will address the proposed  
23 construction of the six new safety tanks.

24 On Friday, January 28th, 1994, the  
25 Department of Energy published a Notice of Intent

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1 in the Federal Register announcing its intent to  
2 prepare these two Environmental Impact  
3 Statements.

4 One EIS, as I said, will address  
5 the proposed tank waste remediation system  
6 activities, and the second will address the  
7 proposed construction of six new safety tanks  
8 for the storage of high-level radioactive waste  
9 as an interim action to the Tank Waste  
10 Remediation System Environmental Impact  
11 Statement.

12 On the same date, January 28th, 1994,  
13 the Washington State Department of Ecology  
14 determined that a SEPA EIS was required for these  
15 two proposals.

16 The purpose then of this scoping  
17 meeting is to allow each of you an opportunity to  
18 identify to identify for the record the  
19 significant issues that you believe should be  
20 considered by the United States Department of  
21 Energy and the Washington State Department of  
22 Ecology in the preparation of these two  
23 Environmental Impact Statements.

24 The format for today's meeting has  
25 been designed to give as many people as

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1 possible the opportunity to participate,  
2 including those who do not wish to make formal  
3 comments.

4 We will take formal comments in this  
5 room throughout the evening until ten p.m.  
6 tonight. And concurrently, there will be  
7 informal information and staff members available  
8 in the room that's just outside of this door and  
9 to the left as you walk out. There are also  
10 handouts in that room.

11 Staff of the Department of Energy  
12 and the Washington State Department of Ecology  
13 as well as the Pacific Northwest Labs and  
14 Westinghouse Hanford Company are available to  
15 answer any informal questions that any of you  
16 might have.

17 A verbatim transcript of this  
18 meeting will be made of all oral comments  
19 received contained in the transcript. And a  
20 transcript will also be made of the other four  
21 scoping meetings. It will be included in the  
22 United States Department of Energy and Washington  
23 State Department of Ecology's record of these  
24 proceedings. The Department of Energy and the  
25 Department of Ecology will make the transcripts

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1 from all five of the scoping meetings available  
2 at information locations located throughout  
3 Washington and Oregon as soon as they are  
4 available.

5 After they have reviewed all of the  
6 formal comments received at the scoping meetings  
7 and the written comments that are submitted  
8 during the scoping comment period, the two  
9 departments will then jointly prepare two Draft  
10 Environmental Impact Statements.

11 When each Draft EIS is available, the  
12 public will once again have an opportunity to  
13 participate in this effort by submitting comments  
14 on the Draft EISs. The two Draft Environmental  
15 Impact Statements will be prepared on separate  
16 schedules.

17 The Draft EIS for the six new  
18 safety tanks is scheduled to be available this  
19 year. The Draft EIS for the tank waste  
20 remediation program is scheduled to be available  
21 in 1995.

22 In a few minutes, I will review the  
23 procedures that we will follow for those of you  
24 who are wishing to make formal comments  
25 tonight.

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1                   At this time, however, I would like  
2                   to introduce Mr. Geoff Tallent of the  
3                   Washington State Department of Ecology who will  
4                   make a brief presentation about the  
5                   compatibility of the NEPA and SEPA processes.  
6                   And he will be followed by Dr. Donald Alexander  
7                   with the Department of Energy's Richland Field  
8                   Office tank waste remediation system program  
9                   office. Dr. Alexander will make a brief  
10                  presentation on the proposed six new safety  
11                  tanks and on the tank waste remediation system  
12                  program.

13                                   Mr. Tallent?

14                                   MR. GEOFF TALLENT: Good evening.

15                   My name is Geoff Tallent with the Washington  
16                   State Department of Ecology.

17                                   The United States Department of  
18                   Energy, which I have referred to as USDOE, and  
19                   Ecology are using an innovative approach in  
20                   reviewing the environmental impacts to the TWRS  
21                   program by combining the requirements of both  
22                   NEPA and SEPA. The two agencies expect ourselves  
23                   and the public to realize several benefits from  
24                   combining these processes.

25                                   The United States DOE and Ecology

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1 are preparing a Memorandum of Understanding  
2 between our two agencies will which spell out how  
3 we are going to streamline the NEPA-SEPA  
4 compliance process;

5 Allow for a joint NEPA-SEPA decision  
6 document;

7 Accelerate the process by  
8 consolidating meetings, mandatory processes and  
9 documents;

10 And provide a mechanism to expedite  
11 resolution of comments and issues.

12 There are several benefits of  
13 combining these NEPA and SEPA processes, and I  
14 will run through a few of them.

15 First, combining streamlines the  
16 environmental review. Instead of taking a  
17 separate fragmented and sequential approach,  
18 Ecology and USDOE are anticipating folding their  
19 NEPA and SEPA requirements together and meeting  
20 them all up front.

21 This will avoid duplicative and time  
22 consuming public reviews in the future.

23 Second, NEPA and SEPA are very  
24 similar in intent as well as process. The  
25 Washington State law was modeled after the

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1 federal law and has no differences which would  
2 prevent the two processes from being combined.

3 In fact, both laws encourage  
4 integration with their counterparts. Ecology  
5 and USDOE believe that the combined effort will  
6 result in a better process for environmental  
7 review.

8 Third, in combining the documents,  
9 the two agencies expect to be able to save time  
10 and money. The two processes each require  
11 extensive public involvement, careful study and  
12 the preparation of several documents. By only  
13 doing these once, we will clearly realize a  
14 savings.

15 Fourth, by working as equal  
16 partners, Ecology and USDOE must agree on  
17 everything in the EISSs. The two agencies will  
18 eliminate the possibility of debating over  
19 conflicting directions later on, and instead  
20 will identify and resolve differences early and  
21 cooperatively.

22 Finally, and most importantly,  
23 nothing is lost in this combined effort. Ecology  
24 and USDOE will continue to maintain full  
25 independent authority over their respective

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1 requirements.

2 This means both NEPA and SEPA must be  
3 completely followed to the satisfaction of each  
4 agency. Additionally, no part of either NEPA or  
5 SEPA will be sacrificed in the joint EISs. Any  
6 information or opportunity for review or comment  
7 that NEPA or SEPA requires will be part of the  
8 combined processes.

9 Now I will take you through what you  
10 will see in both EISs.

11 The statement of purpose and need for  
12 action will explain the problem for which the  
13 proposed actions are being studied. In these  
14 cases, the purposes are the need to resolve tank  
15 safety issues.

16 The description of alternatives  
17 will describe the actions the agencies propose  
18 to take and compare those actions with  
19 alternatives means to resolve tank safety  
20 issues.

21 For these EISs, the preferred  
22 alternative will follow the processes laid out in  
23 the Tri-Party Agreement. Other alternatives will  
24 also be examined.

25 One reason why we are here tonight is

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1 to find out from you what alternatives we should  
2 look at.

3 Finally, the no action alternative is  
4 required by both NEPA and SEPA as a way of  
5 comparing the other alternatives to the  
6 continuing present situation.

7 The EIS will also describe the  
8 environment which will be affected by all of the  
9 alternatives. In these cases it will be a  
10 description of the areas at the Hanford Site  
11 where the TWRS activities would take place and  
12 any parts of the environment beyond the Hanford  
13 Site that might be impacted.

14 In describing the environment, the  
15 EISs will look at three aspects.

16 First, the human environment, which  
17 looks at such things as potentially impacts to  
18 populations and areas of historical  
19 significance.

20 Second, the biological environment,  
21 which looks at such things as potentially  
22 impacted plant and animal species.

23 And third, the physical environment,  
24 which will describe such areas as geology and  
25 ground and surface waters.

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1                   The third parts of the EISs will  
2                   examine the environmental impacts of the  
3                   proposed action and alternatives. This will  
4                   look at impacts to the human environment, such  
5                   as impacts on jobs and disturbance of historic  
6                   areas.

7                   It will also look at potential  
8                   health risks from such things as radioactive  
9                   releases to both Hanford workers and the off-site  
10                  public.

11                  The impacts section will thirdly look  
12                  at possible impacts to the ecosystem such as  
13                  endangering plant or animal species or  
14                  interfering with migrations.

15                  Finally, the EISs will exam methods  
16                  for mitigating or reducing the impacts of the  
17                  proposals and alternatives. These might include  
18                  such things as additional pollution control  
19                  devices, restoration of habitat, or changes in  
20                  the locations of buildings.

21                  As with the alternatives, we are  
22                  here to hear your comments on what the analysis  
23                  of impacts to the environment should include,  
24                  and what possible mitigation measures should be  
25                  considered.

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1           To conclude my presentation, I will  
2 take you through the proposed schedule for the  
3 two EISs.

4           First, a Notice of Intent to prepare  
5 the EISs was published in the Federal Register  
6 and corresponding Washington State SEPA register  
7 on January 28th. Those notices began the scoping  
8 process for which we are holding this meeting.  
9 Comments on the scope of either EIS will be due  
10 March 15th.

11           At that time the path of the two EISs  
12 will split. For the New Tanks EIS, an  
13 Implementation Plan should be prepared by the two  
14 agencies by April 15th. The Implementation Plan  
15 will lay out the schedule for completion and  
16 scope of the New Tanks EIS.

17           The Draft EIS will follow in June  
18 at which time there will be a 45 day public  
19 review and comment period. After that, the two  
20 agencies expect to have a Final EIS out by  
21 August of this year and a final decision by  
22 September.

23           The TWRS EIS Implementation Plan will  
24 be ready in June of this year, but will take  
25 until August of next year to assemble all of the

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1 information for the Draft EIS.

2 After a 45 day comment period, the  
3 final TWRS EIS should be ready by April of 1996  
4 with a final decision by May of that year.

5 However, the two agencies hope as a  
6 result of this combined process to accelerate  
7 the TWRS EIS. If that is successful a TWRS  
8 final decision could be made as soon as June,  
9 1995.

10 This concludes my portion of the  
11 presentation. If you have any questions about  
12 SEPA or NEPA, or the combined processes, please  
13 give me a call, Geoff Tallent at 206-407-7112, or  
14 talk to our Ecology representative in the other  
15 room.

16 Next will be Don Alexander of the  
17 Department of Energy, to describe the proposed  
18 Tank Waste Remediation System and New Double  
19 Shell Tanks. Thank you.

20 DR. DON ALEXANDER: Thank you,  
21 Geoff, and good evening.

22 With an urgency in the 1940s to give  
23 the United States a weapons advantage, many of  
24 the actions were taken without consideration for  
25 the environment and were unregulated with respect

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1 to the environment.

2 The massive legacy of those actions  
3 resulted in waste stored in 177 tanks, 68 of  
4 which are considered to be leaking, and others  
5 which have potential for leaking.

6 The National Environmental Policy Act  
7 was enacted in 1969 to assure that in the future  
8 any major federal action or other proposed  
9 action, such as a major construction project,  
10 especially those involving radioactive wastes, be  
11 analytically evaluated.

12 NEPA requires that the federal agency  
13 complete three types of analyses and weigh them  
14 in its decision-making process.

15 The first is an analysis of the  
16 environmental impacts of the proposed action.

17 The second is an analysis for impacts  
18 of alternative design solutions to the proposed  
19 action.

20 And finally, the proposed and  
21 alternative actions are to be compared to the  
22 environmental implications of taking no action.

23 The alternatives under discussion  
24 today have been presented to you in public  
25 meetings over the past year involving the

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1 Tri-Party Agreement. It was in that process that  
2 some were already dismissed. Grout was a notable  
3 alternative among those dismissed.

4 Although the DOE had alternatives  
5 as announced in the HDW EIS as late as 1988,  
6 the TPA process was essential in aiding the  
7 Department in formulating the current proposed  
8 actions.

9 Once the Tri-Party Agreement was  
10 signed on January 25th of this year, the Notice  
11 of Intent was immediately issued for the proposed  
12 actions on January 28th.

13 In the next few moments I will give  
14 you an overview of the two proposed actions to be  
15 discussed in the meeting today, and I will tell  
16 you how you can contribute to this part of the  
17 process.

18 DOE and Ecology are recommending  
19 two proposed actions.

20 First, to construct six new waste  
21 storage tanks; and second, to retrieve, treat,  
22 immobilize, store and dispose of radioactive  
23 waste from 177 storage tanks.

24 The agencies request comments and  
25 recommendations from you for:

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1 Alternatives to be analyzed; and  
2 Additional environmental issues to  
3 be considered.

4 This slide shows the 200 Area where  
5 the facilities are to be built, the area where I  
6 work.

7 The two proposed actions are:

8 First, to immediately remove radio-  
9 active waste contents from tanks with dangerous  
10 emissions of ignitable gas to safer storage as  
11 shown on the left in the schematic, and on the  
12 right;

13 The second action, is to permanently  
14 retrieve, treat, immobilize and safely store and  
15 in the case of high-level waste, dispose of those  
16 wastes in a repository.

17 Next slide, please. The two  
18 preferred alternatives are embodied in the newly  
19 signed Tri-Party Agreement and are being  
20 implemented today.

21 NEPA and SEPA will evaluate the  
22 preferred and reasonable alternatives and assess  
23 potential environmental consequences.

24 Environmental consequences will be  
25 considered with safety concerns, costs,

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1 schedules, public review and other  
2 considerations.

3 If the environmental consequences  
4 outweigh other considerations, then the DOE,  
5 Ecology, and EPA could revise specific  
6 milestones, but not the end date of the TPA  
7 2028.

8 DOE and Ecology are committed to full  
9 compliance with the TPA.

10 In the Tri-Party Agreement we agree  
11 to build six tanks to eliminate immediate safety  
12 concerns.

13 This is a schematic of a proposed  
14 tank with modern safety controls, including mixer  
15 and retrieval pumps to reduce gas build-up,  
16 liquid and gas sampling systems, improved  
17 ventilation systems, and improved tank integrity  
18 monitoring.

19 For this proposed action, then, the  
20 Tri-Party Agreement defines that we would  
21 construct six new tanks.

22 We are required by law to evaluate  
23 other alternatives, as Geoff and I have both  
24 said, to assure that we have adequately  
25 considered environmental impacts. One potential

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1 is to construct fewer tanks, and rely on other  
2 methods to mitigate safety issues.

3 If we were to choose no action, we  
4 would not mitigate or resolve safety issues.  
5 As I said earlier, this alternative is required  
6 by law.

7 We would like to receive your oral or  
8 written comments on other alternatives to this  
9 proposed action.

10 This is a schematic of the two tanks  
11 and support facilities proposed for the 200 West  
12 Area. So the action is to build the two tanks  
13 that is shown on the left, but in addition, the  
14 support structure that goes along with it. And  
15 there are more details about the structure in the  
16 adjacent room. There would be a similar facility  
17 that would be constructed in the 200 East Area  
18 but for four tanks.

19 Next slide. Now I would like to  
20 give you an overview of the second proposed  
21 action that would be the subject of the TWRS  
22 EIS.

23 In this action we upgrade our  
24 current storage for safety reasons, retrieve  
25 from the 177 tanks, treat, immobilize, store

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1 and dispose of the high-level waste, and as it  
2 is specified in the TPA agreement, vitrify a  
3 low-level waste fraction, and look at storage  
4 on-site.

5 Next slide, please. In this case,  
6 we are required by law to evaluate the  
7 consequences of leaving the wastes where they are  
8 so we can determine the benefit of taking the  
9 proposed action. We have agreed with the State  
10 and EPA through the TPA to retrieve all waste by  
11 sluicing, provide minimum pretreatment of wastes,  
12 vitrify high-level waste, and vitrify low-level  
13 waste.

14 Although we prefer to retrieve waste  
15 by hydraulic sluicing, we have also identified  
16 two additional alternatives for comparison of the  
17 environmental impacts.

18 The first is pneumatic retrieval,  
19 and the second is mechanical retrieval.

20 We prefer minimum pretreatment, but  
21 we also recognize two additional alternatives for  
22 purposes of comparing environmental impacts.  
23 These include no pretreatment, and the other,  
24 extensive pretreatment.

25 For immobilization of high-level

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1 waste, we agree to vitrification.

2 Calcination is an alternative for  
3 comparative purposes of environmental impacts.

4 For low activity wastes, we prefer  
5 vitrification, but we will consider other solid  
6 waste forms for comparisons of environmental  
7 impacts.

8 For this proposed action, again, we  
9 request that you provide other alternatives  
10 through oral or written comments before March  
11 15th.

12 Environmental issues need to be  
13 evaluated for the proposed action as required by  
14 NEPA, including:

15 Effects of releases on the public  
16 and on-site workers from operations and  
17 accidents;

18 The effects on air and water quality,  
19 and other environmental consequences from  
20 operations and accidents;

21 Effects on endangered species,  
22 archaeological, and historical sites;

23 Unavoidable environmental impacts;

24 Cumulative effects of all of these  
25 particular environmental issues;

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1                   Effects from transportation;  
2                   Effects of future decommissioning  
3                   decisions;  
4                   Socio-economic impacts on the  
5                   surrounding communities, like the one that I live  
6                   in;  
7                   Short-term use of the environment  
8                   versus long-term productivity;  
9                   Pollution prevention and waste  
10                  minimization;  
11                  Unavoidable adverse environmental  
12                  impacts;  
13                  Irretrievable and irreversible  
14                  commitments of resources.  
15                  We request that you provide other  
16                  alternatives through oral or written comments  
17                  before March 15th on environmental issues of  
18                  concern to you.  
19                  Next slide. In summary, then, DOE  
20                  and Ecology are recommending two proposed  
21                  actions.  
22                  The first is to construct six new  
23                  safe -- six new storage tanks for safety  
24                  purposes.  
25                  The second proposed action is to

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1 retrieve, treat, immobilize, store, and dispose  
2 of waste from 177 storage tanks.

3 The agencies request comments and  
4 recommendations from you for alternatives to be  
5 analyzed for both cases, and additional  
6 environmental issues to be considered. Thank  
7 you.

8 MS. ALINDA PAGE: Thank you. Mr.  
9 Tallent and Dr. Alexander will be at the table in  
10 the front during the evening, listening to your  
11 comments.

12 Because this is a scoping meeting,  
13 with the purpose of taking comments on a formal  
14 record, of issues that you would like to see  
15 addressed in the Environmental Impact  
16 Statement, they will not interact with you in a  
17 question and answer way, other than to ask  
18 clarifying questions, if they feel that they  
19 would like to hear something more about your  
20 concerns.

21 If you do have questions that you  
22 would like to talk with someone about, Mr. Ken  
23 Bracken, Toby Michelena, and Harry Harmon from  
24 Westinghouse Hanford Company, will be  
25 available, they will go outside this room, to

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1 the room that's set up for that purpose, so  
2 just catch them and ask them whatever you would  
3 like.

4 You do need to be aware, however,  
5 that only comments that you make here at the  
6 microphone are going to be included and  
7 transcribed by the court reporter.

8 So that if there's something that  
9 comes up in your informal questioning that you  
10 feel it is important to be included in the  
11 Environmental Impact Statement, you need to come  
12 here to the mike and be sure that it's in the  
13 transcript.

14 Any of you who have written  
15 comments, I would encourage you to give them to  
16 me so that we could submit them for the record.  
17 I will do so by numbering them, Exhibit Number  
18 whatever, and noting that you submitted them  
19 during this meeting. Documents submitted today  
20 will be formally accepted into the record for the  
21 meeting, in addition to transcripts of oral  
22 comments that are received.

23 And if you are not ready to make  
24 oral comments, we do encourage you to give  
25 written comments, either in your own

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1 documentation or there is a comment form  
2 available in the back of the room that's got an  
3 address on it and is easily returnable to the  
4 Department of Energy or the State Department of  
5 Ecology.

6           Written comments must be postmarked  
7 by March 15th, 1994, to assure that they will  
8 be used in the preparation of the EISs.  
9 Comments received after that date will be  
10 accommodated as practical. And written  
11 comments are given the same level of  
12 consideration by the two Departments as formal  
13 comments that are received in the scoping  
14 meetings.

15           I would like now to go over the  
16 procedures that we're going to use for taking  
17 comments during tonight's meeting. If you would  
18 like to speak, but have not yet signed up, you  
19 need to do so out at the registration table.  
20 Some people pre-registered to speak and indicated  
21 a time at which they would like to speak, in  
22 which case I will call on them as close to that  
23 time as possible.

24           Those of you who signed up when you  
25 got here, we'll call on you in the order in which

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1 you signed up. If I call your name and if you're  
2 out of the room for some reason, not to worry,  
3 we'll go back to you. So you will have ample  
4 opportunity to comment.

5 Second, those of you who wish to make  
6 comments today will be given five minutes if you  
7 are speaking as individuals and ten minutes if  
8 you are representatives of an organization. We  
9 would like to know if you are the official  
10 representative of an organization so that we can  
11 time your comments accordingly.

12 I have a stop watch, and I will  
13 indicate to you when there's a minute to go, if  
14 it looks like you may be running out of time.

15 Third, I will not be limiting your  
16 comments in terms of content today, but I would  
17 encourage you to comment on the scoping  
18 process.

19 And, finally, I would like to  
20 introduce our court reporter, Bill Bridges. He  
21 is preparing the transcript verbatim in the  
22 formal comment portion of today's meeting. In  
23 order to help him prepare this transcript, we  
24 would like you to come forward to this  
25 microphone, give your name and spell it, and

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1 your address before you begin your formal  
2 comments.

3 We will now begin the formal  
4 portion, formal comment period of tonight's  
5 meeting with Bryant Keele, or Keelie, and after  
6 Brian, it's Todd Martin, and after that, it's  
7 Larry Penberthy.

8 MR. BRIAN KEELE: Hi. I am  
9 Brian Keele, Richland, Washington. I've got  
10 some speaker's notes up front, if anyone's  
11 interested.

12 I'm a nuclear scientist for  
13 Westinghouse and I am here speaking on my own  
14 behalf tonight. I have been involved with the  
15 characterization of about 20 different tanks. My  
16 statement is titled TWRS, a grandiose boondoggle  
17 and economic tragedy.

18 The justification for proceeding  
19 with grandiose tank waste disposal activities  
20 is unfounded. The effects of doing nothing are  
21 described in the Final Environmental Impact  
22 Statement for the disposal of Hanford defense  
23 high-level transuranic and tank wastes. It  
24 states, "In the no action alternative, 400 to  
25 4,000 health effects were calculated to occur

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1 among the public as a result of repopulation of  
2 the Hanford site. This may be compared to  
3 300,000 to three million health effects  
4 estimated from exposure to natural background  
5 radiation. For further comparison, about 50  
6 million cancer deaths will occur from other  
7 causes."

8 Now I ask, why must the U.S.  
9 Government proceed with an absurdly expensive and  
10 grandiose environmental policy when the effects  
11 of doing nothing are minimal? There are cheaper  
12 and simpler ways to solving the tank-waste  
13 problem.

14 Tank waste is not a most serious  
15 environmental problem in Washington. Far more  
16 serious problems are related to the loss of  
17 habitat resulting from too many houses, roads,  
18 dams, irrigation and logging.

19 I think that's what we should be  
20 spending our money and efforts on.

21 As a taxpayer, I expect the DOE and  
22 the State to uphold one of the purposes of  
23 writing an Environmental Impact Statement by  
24 studying the effects to the environment that  
25 could arise from applying very simplistic

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1 solutions to the waste problem, even if the  
2 simplistic solutions do not meet the current  
3 political and regulatory agendas.

4 One possible simplistic solution  
5 could be accomplished with the existing  
6 facilities. It is to remove and grout all  
7 pumpable tank liquids. Somewhat regardless of  
8 composition but ensuring that the liquids are  
9 compatible. Then backfill the tanks with very  
10 large rocks, tap it with concrete, install  
11 permanent vents.

12 Two birds could be killed with one  
13 stone by grouting the retired canyon facilities  
14 with the same hot grout.

15 Grout has been dismissed by the  
16 regulators as a politically unacceptable waste  
17 form. While it may not be ideal, it is  
18 scientifically sound and the capability already  
19 exists. Grout will retain the most environ-  
20 mentally dangerous isotopes, cesium-137 and  
21 strontium-90, until they decay to nothingness  
22 with a 30 year half-life.

23 The transuranic isotopes are held  
24 tightly by grout. They are virtually immobile  
25 in soil and are not readily uptaken by

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1 biological systems. They are not a serious  
2 problem.

3 The remaining isotopes are of little  
4 consequence. They consist primarily of  
5 technetium-99, iodine-129 and cesium-135. Their  
6 half-lives are extremely long and their  
7 concentration in the waste tanks is so low  
8 because of the -- is already very low because of  
9 the already half-life.

10 They are not retained in body  
11 tissues. Furthermore, they decay by low energy  
12 nuclear emissions that do not deposit large doses  
13 to tissue.

14 I am also against the construction  
15 of new underground storage tanks. To me, it is  
16 just another Band-Aid to an old problem. DOE  
17 needs to treat and take care of its current  
18 wastes instead of continuing to add to the  
19 problem of indefinite storage of liquid wastes.  
20 Hanford has a grout facility that can be  
21 effectively utilized.

22 Evaluate the technology, both  
23 scientifically and economically. Determine  
24 whether it is worth pushing the country further  
25 towards economic tragedy by spending billions of

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1 taxpayer dollars and taking the country deeper in  
2 debt, just for the purpose of remediating tanks  
3 that have been determined to cause very minimal  
4 harmful effects.

5 I ask that DOE, members of the  
6 public, regulating agencies, watchdog groups,  
7 and Congress, take a hard look at what grandiose  
8 planning accomplishes and what it costs. Thank  
9 you.

10 MS. ALINDA PAGE: You might want  
11 to put copies of your presentation on the back  
12 table.

13 And your comments will be admitted as  
14 Exhibit 2, for the record.

15 The next speaker is Todd Martin.

16 MR. TODD MARTIN: My name is  
17 Todd Martin and I'm a staff researcher for the  
18 Hanford Education Action League located in  
19 Spokane, Washington.

20 I'm going to break with scoping  
21 tradition a little bit tonight in that I don't  
22 have a prepared statement to read. I usually  
23 do. You guys could look at it as either I'm  
24 terribly unprepared or I'm really confident  
25 about what I am saying tonight. Take your

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1 choice.

2 Our cut on the proposed  
3 Environmental Impact Statements is that this  
4 work has been done before. Over two years ago  
5 there was work that culminated in a technical  
6 options report. It did essentially what this  
7 Environmental Impact Statement is proposing to  
8 do.

9 After that report was released, a  
10 task force of stakeholders, everything from city  
11 governments to environmental organizations was  
12 commissioned, and we did more work, considering  
13 these options. It was a vast, immense public  
14 participation effort that dwarfs essentially  
15 what's going on here tonight.

16 What that resulted in is a  
17 renegotiated Tri-Party Agreement, a new cleanup  
18 agreement with a strong regional consensus  
19 behind it. Everybody knew this is what they  
20 want to go on and we were ready to go forward.  
21 And then we get this Environmental Impact  
22 Statement.

23 If you look at the fact sheet that  
24 has been circulated, you will see that the  
25 decisions on how to safely manage, treat, store

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1 and manage Hanford wastes will soon be something.  
2 Also the USDOE and the Washington Department of  
3 Ecology are beginning a process to define the  
4 best strategy safely handling and disposing of  
5 these wastes.

6 I would argue that those decisions  
7 have been made, not that they will soon be made.  
8 And that we are not beginning a process. We are  
9 beginning a process to implement a plan that has  
10 already been decided upon.

11 In short, we don't want to  
12 reconsider HWVP. We don't want to reconsider  
13 grout. We don't want to reconsider advance  
14 pretreatment.

15 Consider them, as you have to,  
16 through your legal mandate in NEPA and SEPA,  
17 but do not do an exhaustive reexamination of  
18 those issues. We've made a decision. There's  
19 buyin from nearly all parties. So let's go  
20 forward.

21 One of the main themes of the tank  
22 waste task force was let's get on with cleanup.

23 And our question is, will this EIS  
24 do this? Is this a -- does this EIS bode well  
25 for a continued and expedited cleanup? And at

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1 the very least, I can see this EIS process  
2 delaying the cleanup, delaying the plan that we  
3 currently have. The schedules are very tight.  
4 If you all slip at all on the Record of Decision,  
5 we're going to lose valuable time, and there's  
6 going to be missed milestones in the agreement.  
7 Nobody wants that.

8 At the worst, there's potential for  
9 Ecology and DOE to use this Environmental Impact  
10 Statement to do an end run around commitments  
11 that have been made in the Tri-Party Agreement.  
12 Nobody wants that either, because that doesn't  
13 result in cleanup.

14 If it doesn't seem that this is going  
15 to push cleanup forward any faster, what is the  
16 value added from doing these EISs? Certainly you  
17 have to do them, because legally you are required  
18 to. But as it is currently scoped, there is very  
19 little value added. Again, this work has been  
20 done.

21 In short, trying to reinvent a wheel  
22 that many of the people in this room have put  
23 hours and hours and hours of time and sweat and  
24 effort into isn't what's needed here. That is  
25 not going to bode well for cleanup.

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1                   Ultimately, to serve cleanup, you've  
2 got to tighten this EIS up, you've got to do it  
3 in an expedited way, so that the schedule of the  
4 Tri-Party Agreement is not affected, and you've  
5 got to do it in such a way as to flesh out the  
6 impacts of the alternative that has already been  
7 selected.

8                   We've got a plan. We've got regional  
9 consensus behind it. What are the impacts of  
10 that plan going to be? Those are certainly  
11 pertinent questions for this EIS. But not to  
12 reconsider questions that we have spent the last  
13 two and a half years answering.

14                   For written comments tonight, I will  
15 submit a fact sheet that we have prepared. We  
16 will be doing formal written comments, as soon as  
17 I get around to it.

18                   I will be making the rounds of all  
19 of these meetings, and there will be a test at  
20 the Seattle meeting for you guys. Since you  
21 are going to hear this five times, you will be  
22 expected to know exactly what I have said, and if  
23 you can repeat it back to me, then I will get off  
24 your back and you won't hear from me until the  
25 end of the EIS. If at that time you still

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1 haven't got the message, I'll see you during the  
2 draft meetings.

3 Thanks.

4 MS. ALINDA PAGE: This is  
5 submitted as Exhibit Number 3, fact sheet from  
6 HEAL.

7 The next speaker is Larry  
8 Penberthy.

9 MR. LARRY PENBERTHY: Good  
10 evening. My name is Larry Penberthy, President  
11 of Penberthy Electromelt Company. We specialize  
12 in vitrification technology; making glass  
13 furnaces.

14 I am here, however, speaking for the  
15 Paul Revere organization, which is a registered  
16 organization with the State. We are serving the  
17 purpose of alerting the public. Paul Revere  
18 comes from the days of Lexington and Concord.  
19 And so that's our purpose.

20 I spoke this afternoon, and a copy of  
21 my paper is back on the table. I will not review  
22 all of that, except to say that the purpose of  
23 vitrification is to avoid the necessity for  
24 building more tanks.

25 Building more tanks is a no action

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1 step. What action has occurred, if you pump out  
2 of one tank and put it in another tank? Nothing  
3 of value.

4 But then I want to suggest  
5 additional remarks on this. How do you deal  
6 with cesium? You see, one of the separations  
7 process is to take care of the cesium. Sure,  
8 it's got an Energy of .66 MEV and it's a hard  
9 gamma and if there's enough of it, it's bad  
10 stuff.

11 But there's two ways of dealing with  
12 the cesium. One of them is to put them through  
13 the separations plant that is being proposed in  
14 part of the total EIS. It's right there in the  
15 book. But then you separate it out and you've  
16 still got the cesium. So then you have to send  
17 that down as high-level waste.

18 I'm proposing yet another way to deal  
19 with the cesium; to remove that cesium by a  
20 process known as decay. That is, you make the  
21 cesium salts into -- that is, there are three  
22 levels, I should explain, there's the liquid  
23 level, there's the salts level, which is  
24 primarily deposited sodium nitrate, and those two  
25 contain the cesium, and then the bottom layer is

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1 sludge, hydroxide sludge, which contains most of  
2 the rest of the activity.

3 So you have the method of making the  
4 upper two layers into glass and make it very  
5 well. And here are the numbers. A 50 ton a day  
6 tank -- furnace would require 10,000 gallons a  
7 day of the sodium nitrate saturated solution.  
8 And since there are 500,000 gallons in each of  
9 the tanks, that means every 50 days you will have  
10 emptied a tank.

11 And we can build a furnace like that  
12 and put it in service in one year.

13 We have a long history of building  
14 700 installations of our equipment, 100 of them  
15 in the size range we are talking about here.

16 So I am saying that there is  
17 another way. Let us store this safely, this  
18 material safely, and dispose of the cesium by  
19 decay. That will mean a matter of 200 years, we  
20 can bury these slabs of glass in containers, one  
21 ton each, and put them into the grout vaults that  
22 have already been built, and more as needed, and  
23 then you will have taken care of the cesium, and  
24 it is a much cheaper process, and it's done  
25 effectively.

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1                    Now, that is the end of my comment on  
2                    that.

3                    I have only one comment about  
4                    grout. I know quite a lot about grout. I know  
5                    something about Portland Cement chemistry. And  
6                    there is no Portland Cement technologist in the  
7                    country who would go for any kind of a sodium  
8                    content in the grout material over one-half of 1  
9                    percent.

10                   That's already above the amount,  
11                   that's one-half of 1 percent sodium nitrate in  
12                   the grout, they will not vouch for it.

13                   The plan for the grout here is 8  
14                   percent.

15                   We made some grout to their  
16                   formula, obtained from Westinghouse experts,  
17                   and we have put that out in the rain, in a rain  
18                   storm, and it started to disintegrate before  
19                   the rain storm was over. It did happen in  
20                   Seattle, so it means you had about a day of  
21                   rain.

22                   But it still is not an adequate  
23                   material by any means, and it was not thrown out  
24                   politically, it was thrown out from technology.  
25                   Grout was abandoned by the Technology Review

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1 Board of the Department of Ecology in June  
2 of 1992, and it's just now penetrating through.

3 Thank you.

4 MS. ALINDA PAGE: Eric Hoppe.  
5 And if there is anyone else that wishes to speak,  
6 you need to sign up. This is the last person  
7 whose name I have.

8 MR. ERIC HOPPE: My name is Erric  
9 Hoppe. I guess I was just wondering what rain  
10 storm only lasted a day in Seattle.

11 I'm just representing myself.

12 I guess I'm not overly confident,  
13 like Todd mentioned, but I am ill-prepared. But  
14 I am wanting to help --

15 I felt strongly, actually, now for  
16 the last three or four years about our tank  
17 characterization efforts, and probably to the  
18 point where Harry is tired of hearing these  
19 comments about these things.

20 But I'm going to keep hitting this  
21 time and time again until we do it right, and  
22 we're still not doing it that way.

23 I notice that right now we're  
24 talking about accelerating characterization of  
25 the tank wastes. And it's very disturbing to

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1 me that we're considering accelerating  
2 something that we still aren't even doing  
3 correctly. It seems to me that we at this  
4 point, and we've talked about this time and  
5 time again, and there are not just a handful  
6 but countless number of very technically  
7 competent people on the site that have  
8 continued time and time again to bring this up,  
9 that we still don't have adequate sampling  
10 devices of the tanks, that we haven't validated  
11 those sampling devices that have been built now,  
12 that we cannot handle the samples properly once  
13 we have removed them from the tank, and we can't  
14 store them properly.

15 So how is it that we are going to  
16 accelerate a characterization when we can't even  
17 get a sample that is representative of the tank  
18 waste in the laboratories?

19 Now, on top of that, we have  
20 laboratories which are just now, in fact only in  
21 the last year, receiving some funding to upgrade  
22 their instrumentation that is required to do the  
23 analysis on the tank wastes, and only this year  
24 are we really seeing some funding turned loose  
25 for development of some methods to characterize

1 that waste.

2 And we're still, I feel, two or three  
3 years off from adequately developing those  
4 methods. And we've got a deadline here to have  
5 all 177 tanks characterized by 1999.

6 And based on our current capacities  
7 on the site, and I know that DOE is investigating  
8 looking at other sites to do this work, but it's  
9 kind of a fruitless search because the other  
10 sites are not prepared to characterize the waste,  
11 and we're only going to add to our handling  
12 problems that you can't even handle here on-site,  
13 let alone shipping them half way across the  
14 country.

15 So I guess what I am asking for is  
16 that we take a step back, not necessarily what we  
17 think is the proper remediation technology, but  
18 take a step back so that we actually know what  
19 kind of wastes we're dealing with before we know  
20 what we're supposed to be remediating.

21 Also, I think there's still some  
22 outstanding safety concerns as far as exposure in  
23 the tank farm area, and particularly if we  
24 accelerate the characterization activities, I  
25 think we're going to inadequately characterize

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1 some of the vapors that might be emitted from  
2 some of the tanks, I think we are just going to  
3 have further exposure problems down the road.

4 So it seems to me that we still have  
5 to take maybe, and I know that right now the  
6 public is very much against any sort of a delay  
7 tactic, but I think we spend an awful lot of  
8 money to characterize the tank wastes in the past  
9 that really has produced very expensive and  
10 oftentimes meaningless data.

11 And I think that when we look at a  
12 cost/benefit ratio to the public, that's when  
13 we spend it on worthless data, then that's an  
14 awfully high cost for very little benefit at this  
15 point.

16 Thank you.

17 MS. ALINDA PAGE: You are  
18 welcome. Do you want me to take those  
19 comments?

20 MR. ERIC HOPPE: No.

21 MS. ALINDA PAGE: Is Mr.  
22 Penberthy still here? I just needed to find out  
23 if he wanted his comments officially considered  
24 an exhibit.

25 30 seconds more, huh? Let me see if

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1 anybody else wants to comment first. Usually we  
2 have a rule that everyone gets a chance to talk  
3 and then we do the second round, if a second  
4 round is requested.

5 Okay. All right. 30 seconds more,  
6 Todd Martin.

7 MR. TODD MARTIN: I will be

8 real quick. Again, for the record, my name is  
9 Todd Martin and I work for HEAL.

10 This was a comment that was actually  
11 in my notes but it was squeezed between two lines  
12 and I forgot to say it.

13 But in making my point about we don't  
14 to want to reconsider HWVP, grout and  
15 pretreatment, I also want it put into the record  
16 that we believe closure should be addressed in  
17 this EIS. And I know you've heard that before  
18 today.

19 And I feel like the rationale for  
20 not addressing it is not sufficient in that  
21 much of that work has already been done.  
22 Again, if you go back to the technical options  
23 report, you can find much of that work there,  
24 and it would be easily applied to this EIS  
25 process.

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1 the subject, Notice of Intent, relies heavily on  
2 that in its discussion. And I felt that I was  
3 not able to adequately prepare for this meeting  
4 because of the unavailability of the TPA for  
5 public review.

6 And I am wondering whether or not  
7 these meetings are being held prematurely,  
8 because that information is not available to the  
9 public.

10 Now, hopefully it will be available  
11 before I'm able to -- before March 15 when I am  
12 able to send all my comments in.

13 Okay. The Notice of Intent does  
14 not include an in-situ disposal alternative,  
15 which is kind of disappointing. That's a  
16 reasonable alternative, both from an economic,  
17 technical and environmental standpoint. This  
18 option was described in the Record of Decision  
19 for the HDW EIS, as one requiring additional  
20 analysis and development, prior to further NEEPA  
21 review.

22 The in-situ disposal does not  
23 conflict with the Nuclear Waste Policy Act, it  
24 does not conflict with RCRA, and it does not  
25 conflict with DOE Order 50-822-A, which does

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1 acknowledge the in-situ disposal of single-shell  
2 tank waste.

3 In addition, in the TPA responses  
4 that were collected, it was recognized that the  
5 in-situ disposal alternative needed to be  
6 included in the EIS.

7 I'm not sure what the reason for  
8 this is, but it appears to be that the  
9 Department of Energy does not want to use the  
10 NEPA process to examine the applicability and  
11 the usefulness of some of the regulations,  
12 particularly those regulatory guidelines such  
13 as RCRA.

14 Another comment. When the HDW EIS  
15 was prepared, and a Record of Decision was  
16 approved, it acknowledged that there needed to be  
17 a lot more analyses done, particularly for the  
18 single-shell tanks and their final disposition,  
19 before proceeding ahead with an EIS for the  
20 single-shell tanks.

21 And those areas included things like  
22 characterization, barrier development, retrieval  
23 technology development, and also examining  
24 in-situ disposal alternatives.

25 The TPA has some of the features of

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1 those activities in it, but they are -- will not  
2 be done on the timing that's suggested for this  
3 EIS. In other words, it's suggested here that  
4 this be a 36 month EIS, and so the  
5 characterization of the single-shell tanks will  
6 not be completed at that time.

7 A suggestion here is to limit the  
8 scope of the TWR EIS, so that appropriate  
9 analyses can be done. In other words, it's  
10 suggested that maybe there would be a phased  
11 NEPA approach, in which we examine the  
12 disposition of the supernatants, and in that  
13 EIS we would include the scope of the new  
14 low-level waste treatment facility, as well as  
15 the low-level waste solidification facility,  
16 whether that be some glass facility or something  
17 else.

18 The analysis for the sludges in the  
19 saltcakes cannot really be done at this time  
20 because of the lack of characterization  
21 information and the lack of technology to  
22 support adequate analysis. So it is suggested  
23 that that be done in a subsequent EIS, to be  
24 done at a later date, perhaps around the year  
25 2000.

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1           If you look at the TPA, we're making  
2 decisions after the time frame in which this EIS  
3 would be prepared. For instance, the sludge  
4 decision, which is probably one of the key  
5 decisions in the disposal strategy, will not be  
6 made until 1998, but yet we're suggesting that we  
7 have an EIS done in about the '97 time frame.

8           So, in summary, I think, in terms  
9 of maybe NEPA, the analysis for sludges and  
10 saltcake, needs to be delayed in a separate NEPA  
11 documentation, document, because the ability to  
12 do adequate analysis at this time is just not  
13 there.

14           I'm concerned about segmentation of  
15 NEPA associated with closure and disposal of the  
16 tank wastes. This NOI does not acknowledge a  
17 cradle to grave examination of connected actions  
18 associated with disposal of the tank wastes.  
19 Without including within the scope of the EIS the  
20 closure action, we can't adequately assess the  
21 environmental consequences of the complete action  
22 of the disposal. Okay?

23           And so we're not going to be able to  
24 really assess issues such as cost, schedule,  
25 environmental impact, worker exposure, and these

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1 sorts of things.

2 In addition, a lot of -- some of  
3 the retrieval approaches will have a  
4 significant impact on the final state of  
5 closure.

6 It is suggested in the case beta Tri-  
7 Party Agreement that sluicing be used as the  
8 reference retrieval technique. It's known that  
9 there's a number of tanks that leak. It's not  
10 known how much additional contamination to the  
11 environment could result from sluicing, but  
12 certainly this will have a significant impact on  
13 the closure situation. And if we did a complete  
14 analysis, we might find that we may want to use  
15 other kinds of technologies for retrieval.

16 The last comment has to do with the  
17 new tanks. The scope of the new tanks is very  
18 limited and it's not clear exactly what their  
19 purpose is. They are being planned to resolve  
20 tank safety issues, and presumably, that means  
21 waste will be retrieved from maybe leaking tanks  
22 or maybe from other tanks and diluted to mitigate  
23 safety issues.

24 There may be a need to have other  
25 functions in those tanks, such as pretreatment

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1 functions, in order to enable case beta to  
2 proceed, or the strategy associated with case  
3 beta to proceed. And it is not clear how and  
4 when that analyses will be done.

5 We do not have the basis, the  
6 technical basis to do that in the timing  
7 suggested for the new tank EIS, which is in the  
8 near term. So it is not clear whether or not  
9 that will be part of the scope of the disposal  
10 EIS or the new tank EIS.

11 It's also, because of that, those  
12 project activities and those design activities  
13 associated with the new tank farms may be at  
14 substantial risk with regard to resources. We  
15 may be designing facilities that are not  
16 capable of doing the job in terms of longer  
17 term missions, and therefore may end up  
18 building additional tanks to complete those in  
19 the future. So that's my biggest concern in this  
20 area.

21 Thank you.

22 MS. ALINDA PAGE: Thank you.

23 Anyone else want to speak at this  
24 point? Okay. So we'll recess again until ten  
25 p.m., or until someone comes, I guess.

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(Recessed at 9:20 p.m.)

(Reconvened at 9:45 p.m.)

MS. ALINDA PAGE: This meeting  
will be adjourned.

(Adjourned at 9:45 p.m.)

\* \* \*

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1 STATE OF OREGON )  
2 ) ss.  
3 County of Umatilla )  
4

5 I, WILLIAM J. BRIDGES, do hereby  
6 certify that at the time and place heretofore  
7 mentioned in the caption of the foregoing matter,  
8 I was a Registered Professional Reporter and  
9 Notary Public for Oregon; that at said time and  
10 place I reported in stenotype all testimony  
11 adduced and proceedings had in the foregoing  
12 matter; that thereafter my notes were reduced to  
13 typewriting and that the foregoing transcript  
14 consisting of 110 typewritten pages is a true and  
15 correct transcript of all such testimony adduced  
16 and proceedings had and of the whole thereof.

17 WITNESS my hand at Pendleton,  
18 Oregon, on this \_\_\_\_ day of February, 1994.  
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22 WILLIAM J. BRIDGES

Registered Professional Reporter  
Certified Shorthand Reporter  
No. 91-0244 Expires: 10-31-95

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