



Department of Energy

Richland Operations Office
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0002745



March 10, 1989

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Mr. Thomas Eaton
Program Manager
Solid and Hazardous Waste Program
Washington State Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504

Dear Mr. Eaton:

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT "ALTERNATIVE APPROACHES FOR DEVELOPING SITING CRITERIA FOR HAZARDOUS WASTE MANAGEMENT FACILITIES"

The U.S. Department of Energy, Richland Operations Office (DOE-RL) and the Westinghouse Hanford Company (WHC) are pleased to be a part of the public involvement process for the Washington State Department of Ecology's (Ecology) re-development of siting standards for dangerous waste management facilities. We have completed a review of Ecology's draft Environmental Impact Statement entitled "Alternative Approaches for Developing Siting Criteria for Hazardous Waste Management Facilities," and find that this document provides a thorough analysis of the environmental impacts of the various approaches to development of siting criteria.

The DOE-RL and WHC are currently involved in the siting of several facilities on the Hanford Site which may be subject to these siting criteria, depending on the permit status of the facilities at the time of adoption of siting criteria and the applicability of the criteria. These facilities include the Grout Treatment Facility (GTF), the Hanford Waste Vitrification Plant (HWVP), and the Waste Receiving and Processing (WRAP) Facility.

These waste management facilities were the subject of a discussion with Marsha Beery and Dan Wrye of your staff on February 6, 1989. Operation of the GTF, HWVP, and the WRAP Facility is crucial to our plans for management of the wastes which have been generated at Hanford over the past 45 years. Due to the large volumes of waste involved, the Hanford Site is the only reasonable location for siting these facilities. The Hanford Site is a 560-square mile reservation located in an arid environment which provides protection of the surface and groundwater as well as isolation from the public.

The DOE-RL and WHC support the use of Alternative 3 - Technical/Scientific and Performance-Based Approach - for the development of siting criteria. We believe that it is important for the siting criteria to be based upon specific cause and effect relationships between facility impacts and risks

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to human health and the environment. We maintain that it is inappropriate to disallow facilities which would otherwise be protective of human health and the environment through the use of subjective siting criteria, such as geographic-based criteria.

We encourage Ecology to provide the opportunity for use of engineering mitigation of potential adverse impacts, and believe that such mitigation is entirely consistent with the concept of Technical/Scientific and Performance-Based siting criteria. While it is always our desire to comply with the regulations as written, we believe that variances from the siting criteria should be considered as a means to provide flexibility in siting facilities which are essential for the protection of human health and the environment.

The DOE-RL and WHC look forward to participating in the remainder of the process for re-development of the siting standards. If you should have any questions regarding our comments, please contact Ms. Margo Anthony of DOE-RL at (509) 376-8375 or Mr. Steve Wiegman of WHC at (509) 376-7325.

Sincerely,

E. A. Bracken

E. A. Bracken, Acting Director
Environmental Restoration Division
Richland Operations Office

ERD:AJK

~~CC: R. E. Lorch, WHC~~

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