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November 25, 1996

Mr. John D. Wagoner, Manager
U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, WA 99352-0550



Dear Mr. Wagoner:

The Oregon Hanford Waste Board appreciates the opportunity to review the Hanford Remedial Action - Environmental Impact Statement (HRA-EIS). The Board supports the comments previously submitted by the Environmental Protection Agency (EPA) and the Washington State Department of Ecology:

1. The Board adds its voice to those of EPA and Ecology in asking for confirmation that the EIS will support cleanup, but not drive cleanup; and further that the EIS will not be used to set cleanup levels or to change decisions already made.
2. Cleanup is principally governed by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the Resource Conservation and Recovery Act (RCRA) under the framework of the Tri-Party Agreement and Consent Order. The EIS should not be used to circumvent these laws in whole or in part.
3. The EIS should use the most recent actual costs for cleanups at Hanford rather than inflated generic estimates.

The Board further requests the EIS be clarified to state that cleanup decisions must be based foremost on protecting public health and safety and the Columbia River.

The Board supports the goals and recommendations of the Future Site Uses Working Group. The EIS does not fully support these goals. Contrary to the recommendations of the Future Site Uses Working Group, the EIS recommends most of the site be placed under restrictions. These restrictions should be kept to a minimum in accordance with the Future Site Uses goals and recommendations.

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Long-term land use restrictions should only be imposed if necessary after cleanup decisions have been made and cleanup completed. The EIS should attempt to minimize the amount of restriction by looking at the surface of the land, the top 15 feet of soil, deeper soil and groundwater as separate uses and limiting restrictions on each to the greatest degree possible. Similarly, the areas restricted should be limited in size within each geographic area to the greatest degree possible.

The Board supports the Future Site Uses Working Group goal that the site be cleaned up to the point that uses are not restricted by chemical or radioactive contamination. Protection of the Columbia River from plumes and protecting certain areas that are sensitive for habitat, Native American uses or other reasons or concerns may dictate an approach to cleanup which is more protective of these assets. These should be considered through broad regional public involvement under the cleanup laws and the Tri-Party Agreement.

The EIS shows the impacts of plumes of radioactive and hazardous wastes from the central plateau, but does not give adequate information about the sources of these wastes, the reasons for their migration, the rates of their migration, and means to minimize or avoid their migration. No reasonable alternatives are offered. These data are essential to any meaningful decisions on land-use. The EIS must account for other restrictions on land use, such as preventing irrigation impacts on movement of waste and plumes.

USDOE must proceed with aggressive cleanup now. Planned land-use should not control or impede active, aggressive Hanford cleanup. Attached is a copy of public testimony from Ms. Lynn Sims.

Sincerely,

Patty Yraguen

Patty Yraguen, Chair
Oregon Hanford Waste Board

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cc: Doug Sherwood, U.S. Environmental Protection Agency
Mike Wilson, Washington State Department of Ecology

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COMMITMENT CONTROL ACTION	
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Summary of Statement of Lynn Sims on the
Hanford Remedial Action Environmental Impact Statement

October 22, 1996

The U.S. Department of Energy (USDOE) proposes to base its cleanup decisions at Hanford on how the land is likely to be used in the future. These land use objectives would guide the level of cleanup throughout the site. I am disturbed by this short-sighted perspective.

This proposed policy does not address "righting the many wrongs" that the environment has suffered. The goal should be to repair and respect the earth. It is not enough to simply clean up the land only to levels that allow a factory to be built or some other limited use to occur.

I believe the site should be cleaned up as best as technology allows. USDOE should also continue to fund research into new cleanup technologies so that an even greater level of cleanup can be conducted in the future.