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HEAL

Hanford Education
Action League

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August 24, 1990

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Hanford Project Manager
Department of Ecology
Mail Stop PV-11
Olympia, WA. 98504



Dear Mr. Nord,

The following are the comments of the Hanford Education Action League (HEAL) on the Determination of Nonsignificance for the 616 Non-Radioactive Dangerous Waste Storage Facility and the 300 Area Waste Acid Treatment System at Hanford.

• General Comments

Both of the SEPA Environmental Checklists lack sufficient details to support the Determination of Nonsignificance. The Department of Energy and its contractors have amply proven themselves to be unworthy of the public's trust. The citizens of this state should not be put in a position in which their own state officials accept unchallenged the value judgments of USDOE and its contractors. As will be demonstrated below, there are several instances in which USDOE and Westinghouse have alleged that their practices will minimal environmental or health impacts. Washington state should not allow Hanford officials to make such claims without presenting any evidence.

When the state begins to mandate that USDOE and its contractors support their claims with sufficient evidence in the DNS, then the public comment period of 2 weeks will be inadequate. The comment period should be increased to at least 30 days.

• DNS on 616 Non-Radioactive Dangerous Waste Storage Facility

p. 5, 2.c: "Emissions to the environment are uncontrolled"--Why does the state not require some sort of filtration?

p. 5, 2.c: The SEPA Checklist does not provide any supporting evidence that the emissions would not exceed "immediately dangerous to life and health concentrations." Moreover it does not state what the other environmental and health effects might be that were not of an immediate nature.

p. 7, 3.c.1): This statement should be required to be more detailed. Hanford should provide information concerning the capacity of the

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building to contain water from the fire suppression system, the amount of water that could escape the building under different scenarios, and whether there have been any fires and/or accidents since 1986.

p. 7, 3.c.2): Hanford officials should be required to provide volume and travel time projections. Even the dumping of clean water on top of the vastly contaminated Hanford groundwater results in a spread of that contamination. Ecology officials reached a similar conclusion themselves concerning the issue of purge water from monitoring wells. That Hanford personnel failed to calculate the travel time and waste volumes is indicative of their cavalier attitude toward the besieged Hanford environment. For over 45 years Hanford has not cared much about spills. The general impression of a desert as a desolate wasteland is not a justification for treating it as something not worth protecting. This impression is wrong. The task of the Department of Ecology is not just assuring environmental compliance but also assuring environmental protection.

p. 9, 6.c: Perhaps the Department of Ecology should require that energy conservation features be included in all projects.

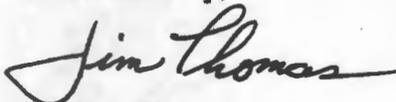
• DNS on the 300 Area Waste Acid Treatment System

p. 6-7, 3.c.2): What is Hanford's definition of "slightly contaminated" and "small amounts"? HEAL is not willing to accept Hanford's word on these kinds of statements and neither should the Ecology Department. Hanford should be required to document the amounts of runoff that are possible, provisions available for cleanup, and the protective measures that could be used to prevent the runoff from becoming contaminated in the first place.

p. 9, 7.a.2): Again, USDOE and Westinghouse state an unsupported value judgment that the "environmental health hazards are expected to be minimal." The public has not been given any justification for accepting this statement. And based upon the past 45 years of experience, it is unreasonable for the state to allow such a claim to go unchallenged. The public should and must be given a role in assessing whether these hazards are minimal. Hanford has not provided sufficient justification to allow the state's finding of nonsignificance.

In conclusion, USDOE and Westinghouse have failed to present adequate information to support their various claims. In the current form, Washington State Department of Ecology must rescind both of these Determinations of Nonsignificance.

Sincerely,



Jim Thomas
Research Director

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