

Background:

The Hanford Advisory Board (HAB or Board) spent a considerable amount of time developing advice on the Draft Tank Closure and Waste Management Environmental Impact Statement (TC&WM EIS, EIS). The U.S. Department of Energy (DOE) has spent over \$80 million on the EIS, and thousands of people attended hearings and commented. The Final EIS is supposed to provide cumulative impact analyses for closure and operation of hundreds of waste sites, guiding decisions from tank farm closure to import and burial of offsite waste.

In anticipation of the release of the Final TC&WM EIS, the Board would like the public and the Board to have an appropriate amount of time to review the Final EIS and have dialogue with DOE in regards to its findings prior to DOE issuing any formal records of decision based upon the EIS.

The Board is concerned that the schedule to issue the Final EIS slipped again until after the issuance of the draft Hanford Resource Conservation and Recovery Act (RCRA) permit. The EIS is theoretically drafted in part to mitigate impacts identified in the permit for units and cumulative impacts.

Advice:

- The Board advises DOE to suspend taking action on any decisions based on the Final TC&WM EIS until there has been time for a review by the Board and interested public, including an in-depth workshop, and time for a responsible dialogue in regard to DOE's responses to comments and the adequacy of analyses. This should provide for a minimum 90 day review and dialogue period, with opportunity for formal adoption of advice by the Board prior to DOE adopting any record of decision.
- The Board advises the Washington State Department of Ecology to not take action on the RCRA permit until the public and Board have had a full opportunity to review the Final EIS for 90 days and to submit comments based on the impacts identified in the Final EIS and in regard to the adequacy of the proposed permit to address those impacts.