Feb. 7, 2002

Keith Klein, Manager
U.S. Department of Energy, Richland Operations
P.O. Box 550 (A7-50)
Richland, WA 99352

Tom Fitzsimmons, Director
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: Acceptance of Offsite TRU Waste

Dear Mssrs. Klein and Fitzsimmons,

The recent shipments of transuranic (TRU) wastes from Battelle Columbus (BCL) and Energy Technology Engineering Center (ETEC) to Hanford caused grave concern to the Hanford Advisory Board (Board). The U.S. Department of Energy (DOE) made this decision before the comment period of the draft Hanford Solid Waste Environmental Impact Statement (HSW-EIS) was completed. These shipments violated the principle that the impacts of, and alternatives to, adding more wastes to Hanford must be fully evaluated in an adequate environmental impact statement (EIS) and aired in a public process prior to wastes coming to Hanford. These actions should not set a precedent for accepting offsite waste or uncharacterized waste that has not met applicable Washington State and federal waste laws and regulations.

Because of concerns regarding the adequacy of hazardous waste characterization of these wastes, all the wastes shipped to Hanford from BCL and ETEC should be fully characterized as soon as possible, including lab analyses and tests necessary to meet Washington State Department of Ecology (Ecology) requirements.

Washington State should require DOE to provide documentation on all wastes that DOE intends to ship to Hanford under the BCL-ETEC agreement, to ensure that the wastes are not improperly stored and impacts are mitigated. In addition, there must be full public access to information on the TRU shipments. The process to resolve how the wastes are characterized, stored and treated should fully involve stakeholders.
Sincerely,

Todd Martin, Chair
Hanford Advisory Board

This advice represents HAB consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: Gary Locke, Washington State Governor
    Christine Gregoire, Washington State Attorney General
    John Iani, U.S. Environmental Protection Agency, Region 10
    Wade Ballard, Deputy Designated Federal Official, U.S. Department of Energy
    Michael Gearheard, Environmental Protection Agency
    Michael Wilson, Washington State Department of Ecology
    Martha Crosland, U.S. Department of Energy Headquarters
    The Oregon and Washington Congressional Delegations

U.S. Senators (OR)
    Gordon H Smith
    Ron Wyden

U.S. Senators (WA)
    Maria Cantwell
    Patty Murray

U.S. Representatives (OR)
    Earl Blumenauer
    Peter DeFazio
    Darlene Hooley
    Greg Walden
    David Wu

U.S. Representatives (WA)
    Brian Baird
    Norm Dicks
    Jennifer Dunn
    Jay Inslee
    Richard Hastings
Rick Larsen
Jim McDermott
George Nethercutt
Adam Smith

State Senators (WA)
Pat Hale
Mike Hewitt

State Representatives (WA)
Jerome Delvin
Shirley Hankins