

Central Plateau Principles Public Involvement Advice

DETAILED BACKGROUND

Cleanup of Hanford's Central Plateau is expected to take another four decades or longer, and cost tens of billions of dollars. The Central Plateau includes the 200 East and 200 West Areas with all of Hanford's High-Level Nuclear Waste Tank Farms, processing plants, sites where over a million gallons of High-Level Nuclear Waste has leaked from Single Shell Tanks (SSTs), and *billions* of gallons of waste was discharged from tanks into the soils near the "tank farms"¹, over 43 miles of burial grounds, large plumes of contaminated groundwater...

In essence, this is the hard core of Hanford cleanup.

USDOE has released proposed Central Plateau Cleanup "Principles," which it would use to guide the cleanup of the Central Plateau for the decades to come. The decisions will have consequences lasting thousands of years. The Tank Closure Waste Management Environmental Impact Statement (TCWMEIS) analyzed impacts to groundwater, for example, from proposals to retrieve either 99% or 99.9% of waste from the tanks. USDOE's TCWMEIS analysis shows that the cancer risk from drinking well water miles away (at the Core Zone Boundary) would greatly exceed the State's cancer risk cleanup standard in the year 3600.²

The Hanford Advisory Board strongly believes that guidance governing how the Central Plateau will be cleaned up must reflect significant informed public input. These decisions must have broad based regional support in order to be funded or move forward without constant challenge, or needing to be constantly revisited.

For public input to be meaningful, the public must understand what the health risks are from future use of the site, groundwater and resources over long periods of time; and, how proposals might restrict use of the land, groundwater or other resources.

The TCMWEIS provides a starting point for such risk assessment and discussion. However, after its final release, following years of preparation and over \$85 million in expenditures, there have been no public forums to discuss the findings or other public education effort to share the analyses. The TCWMEIS can provide important public information in usable formats, such as the map graphics which show repeated pulses of groundwater contamination far above health based standards spreading from the 200 Areas and Central Plateau for hundreds and thousands of years under different cleanup scenarios, for a discussion and public input on principles which should guide cleanup of the Central Plateau.

In our Advice #256 on the Final TCWMEIS, we urged public meetings should be held for the public to understand the potential impacts from cleanup alternatives for the Central Plateau:

¹ "Historical Vadose Zone Contamination from A, AX and C Tank Farms"; RPP 7494, Rev. 0; Aug. 8, 2001; Fluor Federal Services for USDOE. Report documents 3.8 billion gallons of deliberate discharges to the cribs, trenches and ditches associated with the A, AX and C Tank Farms as tank wastes were decanted.

² (TCWMEIS Figure S-18 and S-14. S-14 shows 99.9% retrieval (Alt. 4) contributes a lifetime fatal cancer risk in the year 3050 which is nearly 1 E-4 (1 in 10,000), or ten times the total cancer risk from all sources allowed under MTCA (which is 1E-5). If 99% is retrieved, the fatal cancer risk never drops below 1 E-5 over the next ten thousand years. This is solely due to residuals and retrieval leaks – not including contamination from past deliberate discharges and other sources. Even if 99.9% of the wastes are removed and only two tanks farms are cleaned up, the cancer risk from the well water is nearly 10 times the State's cancer risk standard

“The Board advises DOE to provide the public and the Board sufficient time (90 days) to review the final EIS and have dialogue with DOE in respect to its findings prior to DOE issuing any formal ROD based upon the EIS. One or more public meetings should be held on this topic.”

DOE did not hold such meetings. Now is the time to plan such meetings in order to enable the public to offer informed comment on the principles and cleanup alternatives for the Central Plateau.

The proposed Principles do not include analyzing the health risks from public or Tribal use of land and resources in the area, assuming, instead that use will be restricted to waste management sites and industrial worker use – even for large areas outside any fence lines and without any distinction from adjoining “unrestricted” use areas.

Washington State’s rules for its MTCA cleanup law incorporates the important principle that any restriction of land or resources must be disclosed to the public for public review and comment:

“For public notices describing cleanup plans that use site-specific risk assessment or would restrict future site or resource use, the public notice shall specifically identify the restrictions and invite comments on these elements of the cleanup plan.” WAC 173-340-600(4)(g).

This principle is vitally important in developing a plan for public input and comment on the Central Plateau Principles. In order to meaningfully review and comment on plans which rely on assuming that public and Tribal use of land and resources will be successfully limited for hundreds and thousands of years, it is important to provide the public with an analysis of the health risks from when, or if, there are significant public or Tribal exposures.

Other proposed principles which the public should review and comment on, include, to provide two examples: whether it is appropriate and safe to allow contaminated groundwater to exceed standards beyond the 200 Areas or waste sites; or, whether wastes sites such as the 43 miles of unlined trenches used for “solid” wastes will have wastes characterized or have soil column monitoring.

In Advice #243, in regard to those burial grounds, the Board advised:

“The HAB has consistently encouraged Remove-Treat-Dispose (RTD) alternatives. The burial grounds would be an appropriate place to apply this. The Board advises the agencies to use the following four key values to guide the decision-making process: 1) Minimize impacts on human and environmental health; 2) protect worker safety; 3) conduct an effective and cost efficient cleanup; and, 4) guarantee public participation and transparency.”

These principles, including to “guarantee public participation and transparency” should be applied to the Central Plateau Cleanup Principles. Therefore, the Board advises:

- The public should be provided an understandable risk assessment explaining the health risks from a full range of exposure scenarios, including Tribal use of land, groundwater and other resources for each area of the Central Plateau over various time periods.
- The public should be provided maps and materials describing the lands, groundwater and resources which USDOE would propose to restrict use of for various time periods.

Use of TCWMEIS analyses will make this possible in the coming year. The full range of cleanup plan options – with comparisons of impacts on health and resource usability – should be presented for review and comment.

- The TPA agencies should work with the Board, Tribes and stakeholders to hold public forums around the region during the latter half of 2015 to provide this information and take comment on the cleanup principles in light of how cleanup plans would affect public use of land and resources and the risks to health.
- The TPA agencies should ensure that there is a public analysis of the cost from loss of use of resources, such as groundwater, if proposed Principles which allow for groundwater contamination above standards beyond waste sites or the 200 Areas.
- The agencies should not be adopting “Principles” governing the cleanup of the Central Plateau – which will have impacts on health, the environment and economy for thousands of years – until after there has been a robust regional public education and comment program during the latter half of 2015.