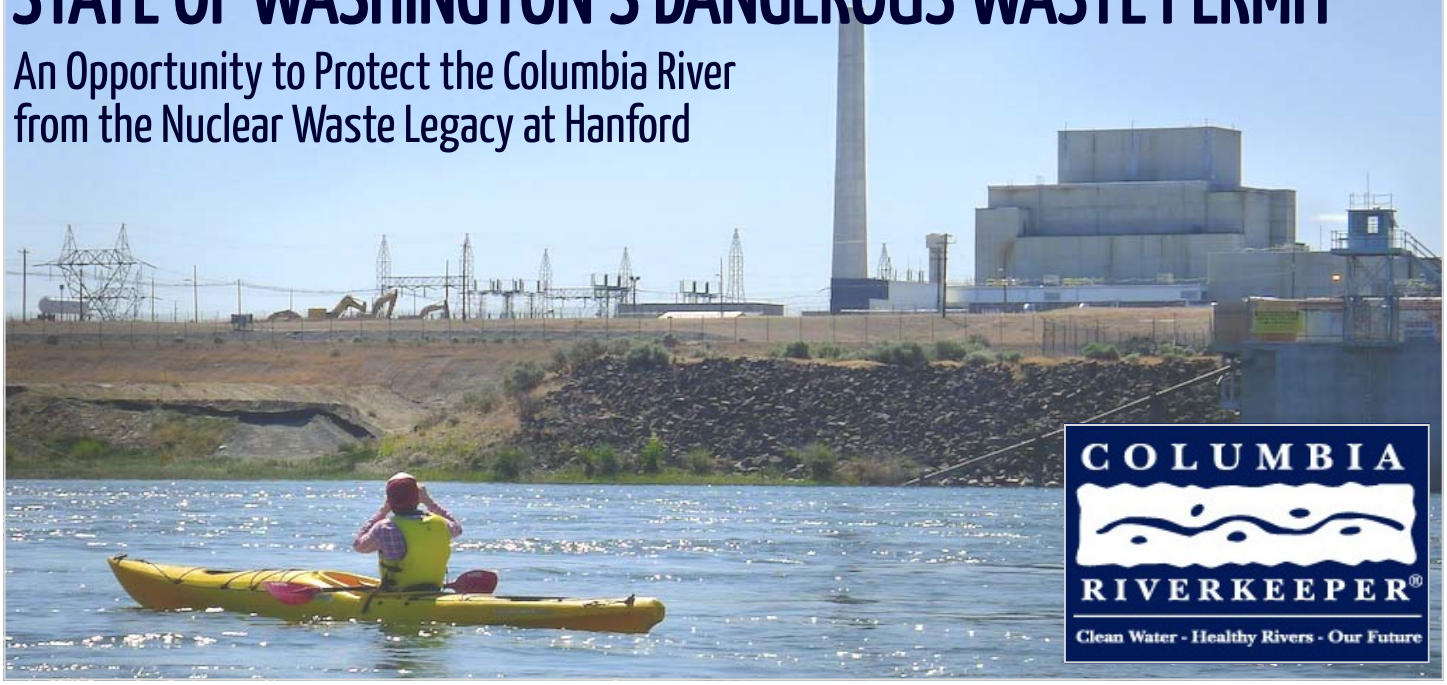
PUBLIC COMMENT OPPORTUNITY: DEMAND CLEANUP AT HANFORD

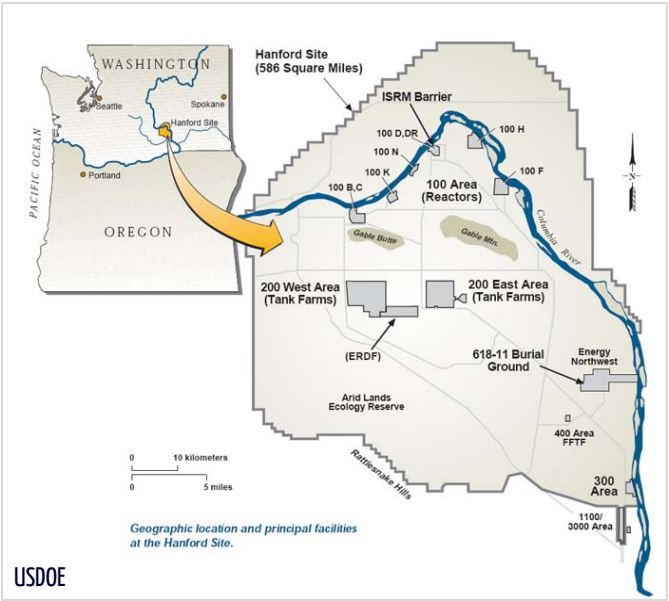
STATE OF WASHINGTON'S DANGEROUS WASTE PERMIT

An Opportunity to Protect the Columbia River from the Nuclear Waste Legacy at Hanford



Hanford is the **most contaminated site in the Western Hemisphere**, where the United States government dumped billions of gallons of radioactive and hazardous waste on the banks of the Columbia, into the river itself, and in the ground. At a staggering 586 square miles—roughly the size the of Los Angeles metro area—the government once used Hanford as a plutonium production complex with nine nuclear reactors. In 1989, the official mission at Hanford switched to cleanup. Unfortunately, a steady stream of proposals to build new nuclear reactors and ship off-site radioactive and hazardous waste to Hanford have detracted from this core mission.

Today, we are faced with a nuclear legacy that continues to threaten the Columbia River. In fact, **70 square miles of Hanford's groundwater exceeds federal standards for dangerous chemical and radioactive contamination**. Every year, the government spends billions of taxpayer dollars cleaning up contaminated soil, groundwater, buildings, and buried waste at Hanford. Citizen involvement is critical to ensure that the U.S. Department of Energy, the agency responsible for cleaning up Hanford, is making smart decisions that protect public health and the environment. Please join Co-



Geographic location and principal facilities at the Hanford Site.

USDOE

WHAT IS THE DANGEROUS WASTE PERMIT?

The Dangerous Waste Permit is how the State of Washington regulates the nuts-and-bolts of cleanup at Hanford. In the permit, the State of Washington's Department of Ecology (Ecology) imposes legally enforceable requirements on the U.S. government that govern how U.S. Department of Energy treats, stores, and disposes of "dangerous waste" at Hanford. In the world of cleanup laws, "dangerous waste" doesn't have a commonsense meaning. Instead, "dangerous waste" includes waste that is mixed with radioactive substances and chemically hazardous waste, such as toxic pollution like lead or mercury, **but it does not include pure "radioactive" waste.**

This product was funded through a grant from Washington State Department of Ecology. While these materials were reviewed for grant consistency, this does not necessarily constitute endorsement by the Department.

PUBLIC COMMENT OPPORTUNITY: DANGEROUS WASTE PERMIT

THE DANGEROUS WASTE PERMIT IS LONG OVERDUE

The State of Washington is supposed to issue a new Dangerous Waste Permit every **10 years.** For Hanford, the State is woefully behind schedule: the State issued the last Dangerous Waste Permit in 1994. Reviewing and reissuing permits on time is critical to ensuring that the most up-to-date legal requirements and science are reflected in the permit requirements. While the State imposed new permit requirements through "interim actions," these piecemeal actions fall short of the legal requirement to review and reissue Dangerous Waste Permits every 10 years.

Tanks store dangerous radioactive and chemical wastes at Hanford. USDOE

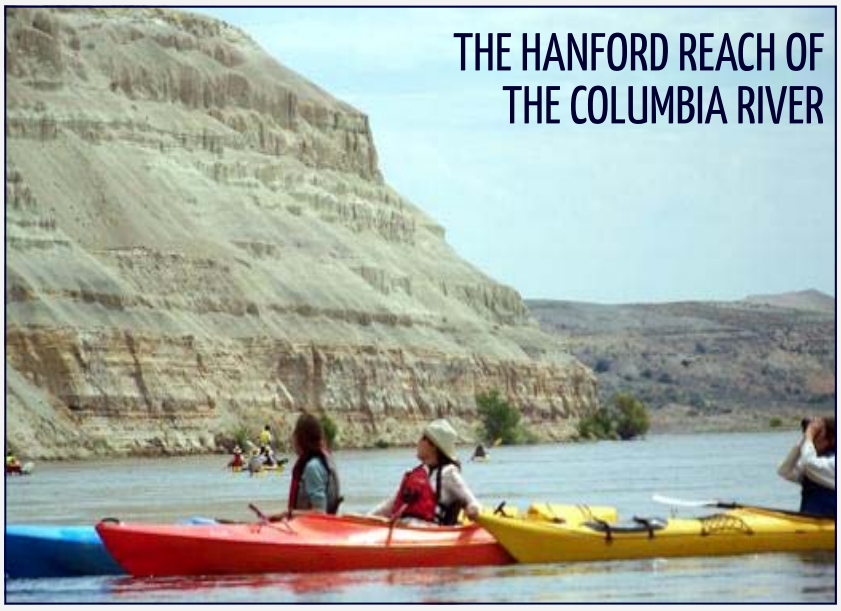
WHY IS THE DANGEROUS WASTE PERMIT IMPORTANT?

The Dangerous Waste Permit is one of the leading ways that the State of Washington polices cleanup at Hanford. Hanford has hundreds of spill sites, waste sites, operating facilities, and waste burial grounds. For example, the U.S. government built 177 underground storage tanks and filled them with 56 million gallons of high level radioactive and chemical waste. According to recent U.S. Department of Energy estimates, 750,000 to 1,050,000 gallons of tank waste have **already leaked**. The Dangerous Waste Permit imposes requirements for how the Department of Energy will manage the waste in the tanks until workers can empty and close the tanks. The permit also imposes requirements related to:

- how much waste the U.S. Department of Energy is allowed to leave in the soil;
- how frequently and what type of groundwater monitoring the government is required to do; and
- restrictions on disposing dangerous waste on land

THE HANFORD REACH OF THE COLUMBIA RIVER

The 51-mile long section of the Columbia River that borders the Hanford site—known as the "Hanford Reach"— is the last undammed section of the river with natural spawning grounds for salmon. Among the forty-three species of fish present in the Hanford Reach are several endangered and threatened species, including the upper Columbia River spring-run chinook salmon, steelhead, and bull trout. Despite the high quality habitat, pollution from Hanford is an active threat to the Columbia River. In fact, chromium, strontium-90, uranium and other contaminants are well documented entering salmon spawning grounds along the Hanford Reach. The importance of the Hanford Reach for salmon and other species of fish and wildlife underscores the importance of a strong, thorough Dangerous Waste Permit.



River users view the picturesque White Bluffs of the Hanford Reach.

PUBLIC COMMENT OPPORTUNITY: DANGEROUS WASTE PERMIT

Suggestions for Public Comments

1. Cleanup First, No New Waste.

Ecology should use its full authority to prevent the import of off-site mixed radioactive and hazardous waste to Hanford.

- Shipping more off-site waste to Hanford conflicts with common sense and the U.S. Department of Energy's own *scientific review*. In 2010, the Department of Energy issued an in-depth technical analysis (*i.e.,* the Tank Closure & Waste Management Environmental Impact Statement) of how adding more waste to Hanford's existing problems would impact cleanup and the Columbia River.
- Ecology should use every opportunity available, including the Dangerous Waste Permit, to prevent short-sighted proposals to add more dangerous waste to the existing pollution at Hanford.

2. Require the Removal of Thousands of Untested Waste Drums in the Central Waste Complex.

Currently the U.S. Department of Energy illegally stores thousands of untested waste drums in the Central Waste Complex. The Central Waste Complex is a large storage area in the center of Hanford that stores radioactive, chemical, and a small amount of low-level waste. This area of Hanford has 19 storage buildings, 27 storage modules for low-flashpoint wastes, and 6 outdoor storage areas that hold a wide variety of wastes.

- In just the last year, the U.S. Department of Energy acknowledged that the waste drums have leaked. For example, in 2008 the Department of Energy dug up and stored outside a large concrete box containing various wastes. In December 2011, a government survey found some radiological contamination on the outside of one of the boxes and contractors applied a fixative. In early February 2012, however, radiological contamination was found on the ground as rainwater dripped off the box's metal framework. This is an example of one of dozens of boxes stored outdoors on gravel at the Central Waste Complex at Hanford.
- The U.S. Department of Energy should be required to characterize all of the waste it stores. The new state permit fails to do enough to ensure waste is removed and treated on a reasonable schedule.

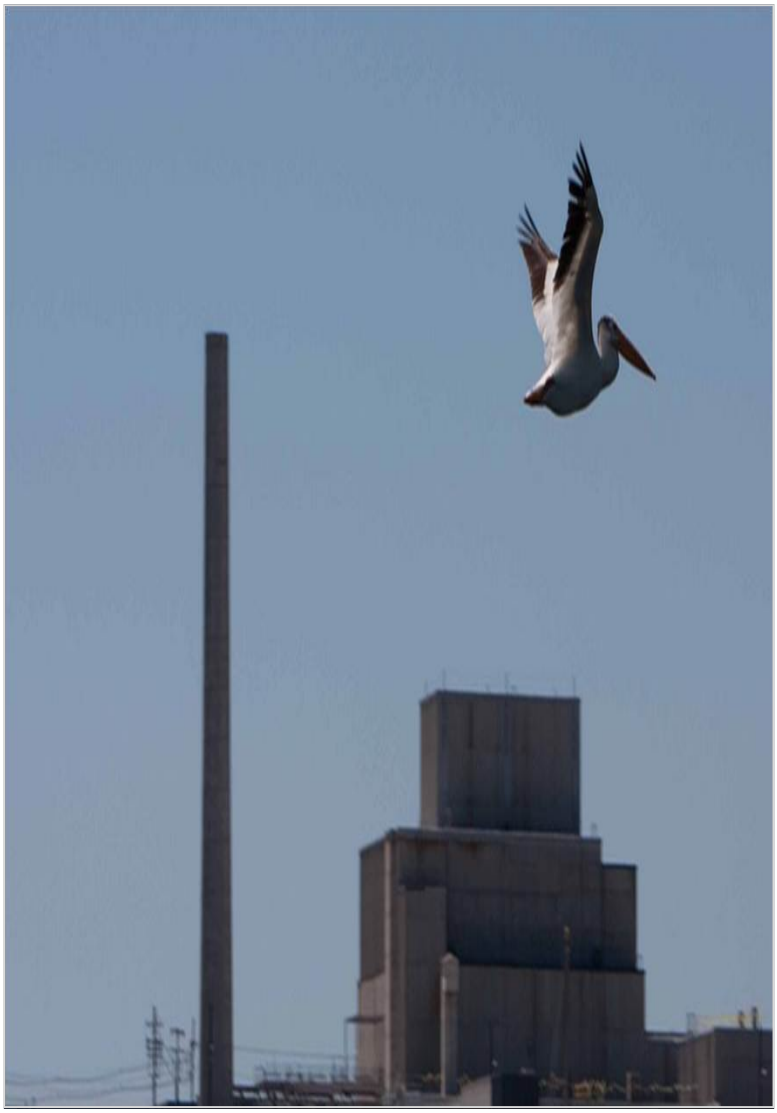
3. Require the Cleanup of 40 miles of Unlined Trenches filled with Radioactive Hazardous Waste.

Covering up radioactive hazardous waste is not a long-term solution to protecting the Columbia River from Hanford's waste legacy. Urge Ecology to require the cleanup of 40 miles of unlined trenches filled 50 feet deep with dangerous waste. Covering up, or "capping," the waste with dirt is not a long-term solution to protect the Columbia.

PUBLIC COMMENT OPPORTUNITY: DANGEROUS WASTE PERMIT

Submit comments by 9/30

VIA EMAIL: Hanford@ecy.wa.gov
VIA MAIL: 3100 Port of Benton Blvd.
Richland, WA 99354



ATTEND A PUBLIC HEARING

SEATTLE
May 15 @ 7:00 PM
University Heights Center . 5031 University Way NE

PORTLAND
May 16 @ 7:00 PM
Red Lion Hotel (Jantzen Beach) . 909 N Hayden Island Dr.

SPOKANE
June 5 @ 6:30 PM
Spokane City Council Chambers
W. 808 Spokane Falls Blvd.

RICHLAND
June 6 @ 6:30PM
Richland Public Library . 955 Northgate Dr.

HOW THE GOVERNMENT CAN DO BETTER

Every year, Hanford cleanup is burdened by proposals to ship off-site radioactive waste to Hanford. This distracts from Hanford's core mission: cleanup. DOE can do better by:

- Ending Proposals to Import Off-Site Nuclear Waste
- Focusing on the Core Mission of Cleanup First
- Meeting Legally Required Cleanup Deadlines
- Fully Funding Hanford Cleanup

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Clean Water - Healthy Rivers - Our Future

About Columbia Riverkeeper

Columbia Riverkeeper is a 501(c)(3) nonprofit organization with thousands of members in Washington and Oregon. Our mission is to protect and restore the Columbia River, from its headwaters to the Pacific Ocean. Since 1989, Columbia Riverkeeper has played an active role in monitoring and improving cleanup activities at Hanford.

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