



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

September 1, 2021

Brian T. Vance
Manager
Richland Operations Office
Department of Energy
PO Box 550
Richland, WA 99352

Re: Test Bed Initiative NEPA Agency Review

Dear Mr. Vance:

Thank you for the opportunity to comment on the draft environmental assessment (EA) for the test bed initiative (TBI) at the Hanford site. As you are aware, the area where the Hanford site is located is sacred to the Yakama Nation and the cleanup of the site is paramount to my people. We have questions and concerns that DOE should consider before finalizing this EA and proceeding to its implementation.

Overall we feel that the draft EA lacks sufficient detail to make a comparison between the alternatives. In our review of the document the major differentiating factor between the alternatives is the distance of road between Hanford, the treatment location, and its ultimate disposal location. While this is an obvious factor to consider the lack of details between current operating abilities and regulatory structure for each treatment and disposal facility is a major omission. Please see the attached technical comments for details to consider in the EA and your decision making process.

While our comments on this phase of the TBI are technical in nature the next phase has the potential to have serious impacts on Yakama Nation resources. We expect a much more collaborative discussion on the development of that project so any impacts can be considered early in the process.

Thank you for your efforts on this matter and I look forward to more discussions on all of the important cleanup work at the Hanford site. If you have any questions please have your staff contact McClure Tosch at mtosch@ynerwm.com or 509-895-4866.

Thank you,

Phil Rigdon, DNR Superintendent
Yakama Nation

Cc: Glyn Trenchard, DOE
Karen Lutz, DOE
Dave Einan, EPA
John Price, Ecology
Laurene Contreras, YN

Attachment: Yakama Nation Technical Comments on the Draft Environmental Assessment for the Test Bed Initiative dated August 17, 2021

Post Office Box 151, Fort Road, Toppenish, WA 98948 (509) 865-5121

Yakama Nation Technical Comments on the Draft Environmental Assessment for the Test Bed Initiative dated August 17, 2021

1. While the draft EA does a pretty thorough job detailing the process that will occur for the retrieval of the waste from the tank it does not describe the timeline to accomplish any of the work. This needs to be clarified in order for the reviewer to understand the proposed process better. In addition, the EA does not specify if all six totes of waste are to be shipped at one time or in phases, please clarify.

2. The EA does not provide enough information to differentiate the potential impacts of the alternatives. Currently each treatment and disposal facility is treated as a black box that will accomplish the stated goals of the test bed initiative (TBI). This has made the only determining factor the amount of miles of road that is needed to transport the waste for treatment and then amount of miles of road that is needed to transport the stabilized waste to a disposal facility. While this is an important aspect more detail should be given in these areas:
 - a. **Treatment facility unloading, treatment, and shipment for disposal details:** There will be logistics differences for each alternative of the unloading, treatment, and ultimate shipment of stabilized waste to a disposal facility. Those processes and timelines that are unique to each alternative have potential risks and environmental impacts associated with them. The details on the timeline, logistics, and potential risks needed to be presented in the EA for each facility.
 - b. **Regulatory framework for each facility:** Currently there is no detail described for each facility that will treat and/or dispose of the waste. This is an important detail because if permit modifications will be required or changes to the implementation of the waste retrieval and shipment are needed to meet permit requirement those can cause potential environmental impacts. The Yakama Nation did a review of the Permafix Northwest Washington Department of Health Mixed Waste Permit and noted some potential items for consideration regard the total weight on the waste to shipped, amount of curies assumed to be in each tote, and impacts to normal operations. In addition there is an overlay with Ecology's RCRA permit that needs to be considered. We did not have time to review the permits for the other facilities but the EA should present that analysis.
 - c. **Non-radiological constituents:** The EA cites the, *Final Analytical Report for Tank 241-SY-101 TBI Grab Sampling 2018*. Document as the source of information on the assumed chemical make-up of the waste. This document is not available for download in the administrative record and is important for the reviewer to have to assess the risks and regulatory processes required for the non-radiological constituents. The document should be made available or even attached to the EA.

3. YN is in the process of completing a complete site TCP study. The effects of this project will need to be determined on known resources and once this work is completed. Transportation routes, potential for accidents, loading and unloading and timelines can all have impacts to cultural resources and should be considered. Permit modifications may need to also consider cultural resource impacts.