



Columbia Riverkeeper
407 Portway Ave Suite 301
Hood River, OR 97031

October 04, 2021

Governor Jay Inslee
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

Director Laura Watson
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

*Sent via email to: jamila.thomas@gov.wa.gov, jennifer.hennessey@gov.wa.gov,
jt.austin@gov.wa.gov, laura.watson@ecy.wa.gov*

**RE: Request for Governor Inslee and Director Watson to Proactively Address
Leaking Tank B-109 and Future Tank Leaks at the Hanford Nuclear Site**

Dear Governor Inslee and Director Watson,

Since December 2018, single-shell tank B-109 in the 200-East area of the Hanford Nuclear Site has actively been leaking radioactive contaminants into the surrounding soil. Tank B-109 has an estimated 15,000 gallons of liquid waste—1,300 gallons of which are leaking into the soil each year and adding to the 200,000 gallons of waste that have already leaked from other tanks in the 200-East area. The Department of Energy (Energy) began the Formal Leak Assessment process in June 2020 and failed to report the leak until April 29, 2021. Energy's negligence in regard to tank B-109 is objectionable and especially alarming due to the direct threat to the groundwater and Columbia River. Regulators must create a viable program that addresses current and future tank leaks. Columbia Riverkeeper urges you both to immediately resolve leaking tank B-109 and develop a long-term tank leak response plan that addresses future inevitable leaks.

Governor Inslee, in February 2013 you expressed concern at leaking tank T-111 and stated, "Let me be clear: Washington state has a zero tolerance policy on radioactive leakage. We will not tolerate any leaks of this material into the environment."

Unfortunately, the zero-tolerance policy appears to be rhetoric—not regulatory action. Tank B-109 is still leaking and Energy continues to minimize the magnitude of the threat. Federal and state hazardous waste laws require that leaking tanks be emptied immediately or as soon as possible. However, Energy has publicly stated that it will not allocate funds to address tank

B-109. Riverkeeper asks Governor Inslee to uphold the zero-tolerance policy and advocate for immediate removal of the liquids from tank B-109.

Director Watson, the Washington state Department of Ecology (Ecology) has the authority to order the immediate removal of liquids from tank B-109, as stated in 40 CFR § 300.525 State involvement in removal actions

(a) States may undertake Fund-financed removal actions pursuant to a cooperative agreement with EPA. State-lead removal actions taken pursuant to cooperative agreements must be conducted in accordance with § 300.415 on removal actions, and 40 CFR part 35, subpart O.

Riverkeeper encourages Ecology to take a proactive approach to remove liquids from tank B-109. One suggested method would use the equipment and process of the Test Bed Initiative (TBI) to extract, treat, and dispose of the radioactive waste in tank B-109. The TBI is promising as it has been thoroughly researched and the initial test of three gallons of waste was successful. The TBI technology provides a feasible solution to remove drainable liquids without further delay.

Contamination from tank B-109 is expected to reach the groundwater in 20 years, and 20 years later it will flow into the Columbia River. Due to the nature of the long-lived, mobile toxins in the tank, they will continue to contaminate the river for another 10,000 years. Energy's proposed solution for the leaking contaminants is to rely on the pump and treat system already in place. The expectation that the pump and treat system will remediate radioactive contaminants at Hanford for the next 10,000 years is senseless. Furthermore, failing to proactively address tank B-109 and instead allow the toxic and radioactive contaminants to leak into the soil because there is already mitigation in the B complex groundwater is nonsensical. We cannot allow increased and continued contamination into the soil because the soil is already contaminated. The problem of tank B-109 demands a more proactive solution. Simply doing nothing and allowing the waste to leak into the soil is unacceptable. Riverkeeper urges Director Watson to advocate for the immediate removal of liquids in tank B-109 and develop a long-term leak response plan in preparation for future tank leaks.

Energy has demonstrated a lack of concern regarding leaking tank B-109—deemphasizing the real danger the contaminants pose to the surrounding environment. We appreciate the leadership both of you have shown on Hanford cleanup in the past and ask you to immediately resolve leaking tank B-109 and develop a long-term tank leak response plan that addresses future tank leaks.

Thank you for your consideration of this matter.

Sincerely,

Simone Anter

Staff Attorney
Columbia Riverkeeper

Miya Burke
Hanford Cleanup Intern
Columbia Riverkeeper