



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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May 17, 2011

Mr. Arnold Edelman, Document Manager  
Office of Technical and Regulatory Support (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, DC 20585-0119

**Re: Draft Environmental Impact Statement (EIS) for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste (LLRW) and GTCC-Like Waste (DOE/EIS-0375D, Draft EIS)**

Dear Mr. Edelman:

We are very disappointed that the draft EIS for the Disposal of GTCC and GTCC-like Waste continues to list Hanford as a viable location for the disposal of these highly radioactive wastes. We believed that a thorough analysis would clearly demonstrate that this additional burden of waste would create unacceptable environmental consequences. Rather than focus on analyzing the most appropriate site for disposal of these wastes, the EIS appears to try to preserve every potential option and alternative – to the detriment of the entire process.

The states of Washington and Oregon adamantly oppose use of Hanford for disposal of GTCC wastes. Both of our states have been deeply engaged in, and supportive of, cleanup of radioactive and chemically hazardous wastes at Hanford for over 20 years. Adding more waste to the subsurface – especially waste that is highly radioactive and long-lived – is incompatible with the cleanup effort that has come at such a high price and that we all support.

Since Hanford cleanup began in 1989, the federal government has spent more than 30 billion taxpayer dollars to try to clean up the extensive environmental injury caused by 45 years of plutonium production. The United States Department of Energy (USDOE) will be cleaning up the existing contamination at Hanford for many decades to come, at a cost of tens of billions of additional dollars. The problems USDOE faces at Hanford are so daunting that no precise estimate is possible.

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Even when the work is complete to the best of our collective ability, extensive contamination will remain. USDOE's own analysis in the draft Hanford Tank Closure and Waste Management EIS shows persistent contamination of Hanford groundwater for thousands of years due to waste now in the subsurface.

It is inconceivable to us that USDOE would spend billions of dollars to try to clean up the environmental damage at Hanford, yet ignore that work by proposing to dispose of additional highly radioactive wastes on the site.

Protection of the Columbia River is a core value of the states of Washington and Oregon and the people of the Pacific Northwest. The consideration of Hanford as a disposal site for GTCC wastes is contrary to that value. We strongly urge USDOE to remove Hanford from the list of possible sites for disposal of this waste.

Sincerely,



Ted Sturdevant  
Director  
Washington State Department of Ecology



Bob Repine  
Acting Director  
Oregon Department of Energy

cc: Dennis Faulk, EPA  
Matthew McCormick, USDOE  
Scott Samuelson, USDOE  
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cc electronic:

Keith Phillips, Washington Governor's Policy Office  
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