

**EIS PUBLIC HEARING TRANSCRIPT
BELLEVUE
October 23, 2000**

This is Administrative Law Judge and I am presiding over an informal environmental meeting and also public hearing regarding the Washington State Department of Health and Ecology Draft Environmental Impact Statement for commercial low-level radioactive waste disposal site near Richland, Washington. Today's date is October 23, 2000, and we are convened tonight at the Department of Ecology, Northwest Regional Office, located at 3190 160th Ave SE, Bellevue, WA. The time is currently 7:23 p.m. The public hearing aspect is scheduled to begin at 8:00. We have heard a presentation from Larry Goldstein of the Washington Department of Ecology and Nancy Darling of the Washington Department of Health to introduce the question and answer period to start at 7:30. We have reserved time for one of the stakeholders in these issues to make a formal presentation and then to go to the question and answer. Mr. Gerald Pollet will be speaking, and Mr. Pollet, I'll turn it over to you at this time. I'd ask you simply to identify yourself for the record with your name and spelling and also your address. Mr. Pollet, thank you.

Gerald Pollet (29)

Thank you. I am Gerald Pollet. I'm Executive Director of the Citizens Group Heart of America Northwest, 1305 Fourth Ave, No. 208, Seattle, 98101, and I want to thank you for agreeing to have an alternative presentation at the outset which hopefully will encourage questions and comments. Unfortunately we don't have a very big public turnout tonight, and that saddens me because there are a great deal of major issues presented by the proposed or pending actions with very major impacts to policies adopted by the state of Washington, and let me start by saying, we very firmly believe that an environmental impact statement must address policy choices, when there are clear policy choices to be made, such as whether or not to accept foreign waste and the clear policy choices accept or reject, and each has environmental impacts and there's a state policy, then one should address that state policy and the environmental benefits of rejecting foreign waste. Likewise, the state of Washington for very strong environmental reasons has said, we oppose the use of commercial low-level waste sites for the U.S. Department of Energy's low-level wastes, and there are very good reasons for this, and the U.S. Department of Energy has adopted a policy which precludes in most instances the use of commercial low-level waste sites for disposal of its wastes except in unusual circumstances, and again, these are rooted in environmental concerns. Failure to address these issues means that you have not addressed the requirements of SEPA of reasonable alternatives and their impacts being addressed. There is a current proposal, and I use the word proposal to ship FFTF nuclear reactor and plutonium processing wastes few miles from one site at Hanford to the commercial low-level waste disposal site in question tonight. If the state was to accept this, then the state action would engender the full range of FFTF and plutonium processing restart impacts and this is a state action. Therefore, as the first state action towards allowing the restart of plutonium processing, for instances, with a unique set of waste streams not considered in this EIS, the full range of impacts needs to be considered. If the Department of Energy gets to

send waste from one operation at Hanford to this site, then the state has a tough road to follow if it wants to limit other U.S. Department of Energy weapons plans from sending their wastes, and their record of characterizing their wastes and complying with our state's hazardous waste laws is abysmal. But we'll hear more about that later tonight I am sure. There are three truly major issues that we'd like to encourage the public to consider and address. 1) The FFTF reactor restart and its impacts and taking U.S. DOE wastes at a commercial low-level waste site. 2) The non-waste proposal doubles the amount of low-level radioactive wastes coming into this site. It has significant transportation impacts. 3) The issue of what level of risk should the combination of the closure cap on the site, the practices allowed for disposal and total amount of waste allowed into the trenches, what amount of risk from exposure should be allowed and that question deals with our state law referred to earlier by Larry Goldstein, our Model Toxics Control Act which is our state's superfund or hazardous waste cleanup law. Let me start with that. This EIS essentially proposes a plan by which one location at Hanford is allowed to leach and expose the public to a much higher level of risk than the other areas that we're cleaning up at Hanford and other burial grounds that are going to be remediated. This EIS would allow, under pending actions and proposals, US Ecology's proposed cover, for instance. It would allow risks from exposure to 25 milligrams of radiation as a dose and we're cleaning up everything else around it so that burial grounds do not result in a total combined dose greater than 15 milligrams, so why should we not limit this site to what we're paying with our tax dollars, billions of dollars to clean up to 15 milligrams. In fact, the citizen groups and Native American Tribes, however, have pointed out repeatedly that 15 milligrams results in a dose that isn't allowed at your corner gas station, the Boeing cleanup down the road, or any other hazardous waste site in the state of Washington. MTCA requires that the residual risk of exposure to a child or a most exposed person not cause more than one cancer for every 100,000 people exposed. Under the US Ecology proposed cover, the off-site Native American child would receive a life time cancer risk 44 times higher than what we require the local gas stations to clean up to or any other superfund site in the state of Washington. It's 4.4 times 10 to the minus 4th, if you want it in technical terms, for the record. That's unacceptable, and that doesn't even include increasing the amount of NARM in that calculation. The standard for MTCA, our state law, says you must consider the sum total of all carcinogens that leach from a site in determining how much you have to clean it up. This EIS deals solely with the radionuclides leaching from the site. Tonight I was handed an errata sheet that says what we had already heard, that this site has probably already leached hazardous wastes that are carcinogens above our state cleanup standards to ground water. So we already should be talking about not closing it just to meet the radionuclide standard, but the hazardous wastes dumped in this site need to be cleaned up, along with the radionuclides that are already leaching and that is not considered here. And the sum total of the hazardous wastes, plus the radionuclides, should be a fatal cancer risk that is 44 times lower than proposed under the US Ecology proposed cover and far lower than under the enhanced covers as well. This EIS fails to include the risk of institutional controls failing and calculating that as part of the total allowable cancer risk. Instead it says 23 milligram here but when an intruder on the site goes through the fence and Ecology recognizes in its superfund rules that a fence is an attractive nuisance going to be reached. When under Ecology

rules you have to consider the likelihood of it being breached and the total risk still can't exceed 1 in 100,000. Here you have doses ranging upwards to 500 milligrams, in incredibly high doses. The filled site alternative with US Ecology's cover is 780 times higher than MTCA for rural resident child or adults. That's 7.8 fatal cancers for every child, every 1,000 children exposed to the site, and there is no cumulative risk analysis in the real meaning of the word required by the law in this EIS right now. SEPA, our State Environmental Policy Act, requires you to say, what are the radionuclides, what are the hazardous wastes and sum them. For MTCA purposes we must consider that sum as well, as I said. There's no analysis of that. It's as if the hazardous wastes were swept under the rug here, but we need to go investigate and clean them up and the closure alternatives would essentially ignore that. The second cumulative risk ignored is the most obvious one. This EIS pretends that the US Ecology site is not in the middle of the Hanford Nuclear Reservation. It is in the middle, and if this site gives a total risk of say, 4.4 times 10^{-4} or kills 4.4 out of every 10,000 children, then you sum up the rest of the Hanford site, and for the law the site is one unit, then think about the total cumulative risks we're talking about from Hanford, and that is not discussed here at all. In conclusion, we believe that Ecology and Health need to require the commercial dumps closure and monitoring plans to limit the total amount of radionuclides going in, and redo the closure cap and redo the operational requirements to include things like encapsulation and tracking every waste that goes in to reduce the total cancer risk from this site to what is required by Washington's Model Toxics Control Act so in 10 years, 50 years, or a thousand years, we don't have a new superfund site. That is state policy and that's what we should be striving for. We need to stop separating the hazardous waste cancer risk from the radionuclide cancer risks. We need to end random disposal dumping of wastes so we know exactly what went where and consider the cumulative impacts, not just on human beings, but incredibly enough there's no discussion of cumulative impacts to the Columbia River from the leaching of this site. On NARM wastes and transportation the cumulative risks are also not covered. What is the risk of adding 100,000 cubic feet of transported waste per year, some years perhaps 400,000 cubic feet, other years less? What are those risks by transportation routes when we're talking about I-90 through downtown Spokane and I-84 over the Blue Mountain Pass? This EIS does not also consider the reasonable alternative of saying no to NARM. Just say no to NARM, simple, easy to repeat – no to NARM. Why do we need to take it at all? Why should we take this waste? Well, another alternative might be, well, some of it is generated in this region. How much? It's much less than 8,000 cubic feet per year, so a reasonable alternative would be to say, we will limit the amount of NARM disposed to the reasonably projected quantity of NARM that Oregon and Washington produce in a year. That's what we do for hazardous wastes. That's explicitly what we do under EPA proposals for hazardous waste dumps, and we should do it here. There is a significant transportation impact and this EIS ignores, and the Health Department has ignored the fact that Initiative 383's policy on importing more radioactive waste to Washington State is still the law, and it says, adding more has risks that are unacceptable, and they are significant and everything should be done to discourage adding more. So, we urge people to support and Ecology and Health to go back to the drawing board and come up with a NARM waste alternative that is reasonable and is either at zero a reasonable alternative, or a NARM waste alternative that is based on much lower level of how much

waste is generated only in the two state region, which is what the Sierra Club tribes, Heart of American Northwest and other groups, urged the Department of Health to do some five or six years ago when you had a NARM waste task force. That closes our comments for now. We have a lot more technical issues, but let me close by summarizing. U.S. DOE wastes coming into the commercial low-level waste dump violates state policy that's set for many good reasons and is the first state action towards restart of plutonium processing and the FFTF reactor and therefore those impacts need to be considered and we will do whatever it takes to require that to happen. Secondly, MTCA, our state cleanup standard can't be violated by the operation of this dump site. That means limiting the amount of waste further, limiting the total quantity of waste, the source term. It means limiting, changing operational requirements and it means changing the closure requirements, including the cap. And lastly for NARM, you've got to have a zero or a much lower limit than 8,000 cubic feet and the impacts justify that. Thank you very much.

We're back on the record at this time. The parties have made presentations on both sides of the issue. I have before me the attendance list. There have been two lists circulated at the door, one for those who simply were attending, registering attendance and allowing you to put yourselves on a mailing list for the future notifications on this particular environmental review and then the second list is for those who wish to testify. I'm going to go by order. I have four speakers identified. Mr. Pollet has already made his comments. The next speaker is Stanley Addison. If you would come up here and make your comments from here.

Stanley Addison (1)

Thank you. My name is Stanley Addison. I'm the radiation safety officer at the University of Washington. I really don't have much to say and from the perspective of the University of Washington, I really cannot comment on the environmental impact statement. However, I want to make a point that it's imperative to keep the site open for a number of reasons, but certainly for the diagnosis and treatment of human disease, the use of radioactive materials cannot be replaced, and so we'd like to see that every effort is made to keep the site open and to keep allowing medical or research waste to go into the site. Thank you.

Thank you Mr. Addison. Next speaker is, and I'm going to apologize up front. I'm probably going to be butchering names in pronunciation, but Boll – have I got that correct? Bell.

Eldon Ball.

Thank you, and the pronunciation again?

Eldon Ball.

Thank you, and I'm sorry about that. Just please, again identify yourself and your address.

Eldon Ball (40)

My name is Eldon Ball, my address is 11244 Dreamwood Ave. N., Seattle. My comments are very brief. I think we should allow the lowest amount of waste essentially maybe what's generated in Washington and Oregon. I think that if they're dumping this into ditches, that's essentially stupid, unlined ditches. They should be fully lined so nothing will leach into the soil, and I don't think today we even allow garbage to be dumped on bare ground. I think that has to be lined. Why shouldn't nuclear waste be lined, the ditches? That's the first comment. The second, I don't think we should allow anything from the past ____ test facility to be put there. If and when that is ever allowed to restart. That's it.

Thank you Mr. Ball, and this is just a reminder, but your comments tonight are welcome both on the methodology of the EIS as well as the substance of the matter reported, and simply your requested to be as specific as possible and I certainly haven't had any problems with any of the comments so far. The next speaker is Ruth Yarrow.

Ruth Yarrow (38)

I'm Ruth Yarrow, with Washington Physicians for Social Responsibility, 4554 12th Ave NE, Seattle, 98105. I'm here instead of Physicians tonight because we had an all afternoon meeting and they're having a board meeting right now and so I was the one that was able to come, but I'm here to read a statement that the Hanford Task Force of WPSR has written to express their feelings about the site. We the members of the Board of Physicians for Social Responsibility and the WPSR Hanford Task Force, would like to express our deep concern about the joint Washington Department of Health and Department of Ecology DEIS on relicensing the commercial nuclear waste dump at Hanford Nuclear Reservation. We're dedicated to the public and environmental health of citizens of Washington State. As the two state departments concerned with human and environmental health, we expect you to stand firm against any further import of waste to Hanford, at least until the current high level tank waste and solid waste sites are remediated, but on the contrary, we read in your DEIS that a renewal of the US Ecology license from Washington State for operating the commercial low-level radioactive waste disposal site is being proposed. We staunchly oppose this renewal until significant progress and Hanford cleanup as noted above, is achieved. There is no safe level of radioactivity in the environment and Hanford is far and away the most contaminated nuclear site in the nation. We're particularly concerned that this license does not prohibit the disposal of radioactive wastes from the Fast Flux Test Facility (FFTF) and associated plutonium processing if that reactor were to be restarted. As you know we adhere to the TPA mission for Hanford of cleanup and oppose any Hanford production and further waste except as required to remediate the present waste sites. We urge you not to renew this license. Any potential economic benefit to the state of Washington is far outweighed by the clear signals such an action sends to the nation. Got Nuclear Waste? Then send it to Washington. Second, the DEIS considers the increasing number of cubic feet of diffuse NARM waste up to 100,000 cubic feet per year. We strongly oppose increasing this limit of radioactive waste to any site at Hanford. We're most concerned about this potential doubling of radioactive wastes moving across our

state's highways. Ominously, transport isn't limited to land and to waste from this nation as the air shipment of Spanish NARM waste to Moses Lake this past July demonstrates. Third, the DEIS considers the closure plan a waste site which will remain radioactive for 10,000 years. This radioactivity is not contained as the DEIS proposal to allow 25 milligram doses to the public shows. How can the departments of Health and Ecology approve allowing such health risks that exceed MTCA limits? Given the immense health burden on our state at Hanford already, we urge your departments to schedule the earliest possible closure of this site. Protecting the health of Washington State citizens may not be popular with commercial site operators, but our job as physicians and yours is as the state departments that are mandated to prevent health threats to our public and environment are mandated to protect health. As physicians, until Hanford's high level waste is stabilized and the current solid waste dump sites contained, we prescribe no renewal of the license to the site, no more import of waste, and the earliest possible closure plan. Thank you for considering these comments from the health professionals of our Hanford Task Force. Signed, Tim Takaro, M.D., Patricia Blako, M.D., Charles E. Weims, M.D., Don Colby, M.D., and the staff of WPSR. Thank you.

Thank you Ms. Yarrow, and I'm going to go off the record for one moment to change the tape.

This is side 2 of Tape number 1 in the public hearing regarding the draft Environmental Impact Statement for the Hanford LLRW disposal site, and our next speaker has not signed in. Your name is?

Hyun Lee (59)

Hyun Lee, 1305 4th Ave, Suite 208, Seattle, WA 98101. Three things: first, the draft EIS needs to consider the very real environmental impacts of accepting waste from possible restart of the Fast Flux Test Facility nuclear reactor at Hanford and its associated plutonium processing waste streams. In the context of accepting waste from FFTF, how did American Northwest is documented that US DOE's waste acceptance criteria for acceptance of DOE wastes from around the country and off-site sources is entirely inadequate. US DOE sent numerous illegal shipments of Washington designated waste or RCRA hazardous waste to Hanford's low-level waste only burial grounds. These documents had to be obtained through the Freedom of Information Act because DOE in Richland would not willingly provide this information to the public when asked for them by stakeholders. Quite a few boxes of this material in the office, and this documents a long history of mispackaging wastes, transporting them improperly, mislabeling them. This long history of mismanagement of hazardous wastes has to be taken into consideration before moving forward with the DEIS. Permitting disposal of these improperly packaged, improperly transported, and improperly disposed of wastes at US Ecology adds to the existing threat that was documented in today's errata sheet. Furthermore, acceptance of these wastes will open the door – will be the first step in terms of the state actions to opening the door to restart the FFTF which would then be operated by the same management system as DOE and produce wastes from the same agency that has penetrated that long history of waste mismanagement. This has to be

taken into consideration in the EIS. Second, acceptance of additional waste quantities at US Ecology needs to be examined in terms of the context of the US Ecology site investigation. It stated that there was acetone, trimethylbenzene, PCE, toluene, and xylene, which are dangerous wastes. Health and Ecology, the state regulators, need to reexamine the waste acceptance criteria for wastes at US Ecology before moving anywhere near forward with a closure plan. More specifically, the waste acceptance criteria needs to be redone and the generator's sites must be inspected to see if they're packaging and transporting and manifesting practices do comply with state law and requirements. Third, the proposals will allow US Ecology to accept additional wastes at the site to _____ degradation resulting in doses to the public of 25 mil run is unacceptable, especially in the context of the US EPA, their Office of Emergency and Remedial Response and the Office of Solid Waste Emergency Response ____ Guidance that says that guidance that provides for cleanup standards where contamination exceeds 15 millirem, which is about 3 in 10,000, is not protective and generally should not be used to establish cleanup levels. Taking that into consideration, the cleanup standards proposed _____, the dose scenario proposed for US Ecology needs to be rethought of and the EPA guidance has to be taken into consideration.

Thank you. Go ahead. Just identify your name and – identify yourself by your name and your address.

Amber Waldref (36)

My name is Amber Waldref, and I'm with Heart of America Northwest, 1305 N Avenue, Suite 208, _____, and I was just going to make some brief comments about this draft EIS. My comments are directed towards the kind and amount of waste transported into Washington State to the low-level reactive waste dump, especially the increase in the NARM waste, and I have some concerns that the EIS doesn't adequately address the impacts or the risks of allowing the 400 to 1,000 more truckloads of radioactive waste that would be brought into Washington State each year if you bring the amount of waste up to 100,000 cubic feet, and I read through the EIS, the pages 79-81, talk about transportation risks, and I saw some basic transportation risks explored but I wasn't really satisfied that each route of where the waste would be coming from, was adequately looked at. Especially, as Jerry mentioned earlier, the I-90, Spokane route and the I-84 Umatilla route. I want to make sure that the people on those routes are safe and that all the risks are explored and the draft EIS proposes – I'm sorry, the pending action is to allow that the disposal of 100,000 cubic feet of NARM per year, and that would double the amount of radioactive waste transported to the site, and this may more than double the risk of transportation accidents. And the reason I say this is because the amount going in under the pending action, the rolling over from year to year of the waste, that could mean, if I understand it correctly, that more than 100,000 cubic feet could be brought in one year if less is brought in another year. I didn't see this taken into account in the transportation risks, so on page 81 it does say the contribution of NARM to future transportation risks is extremely low. However, less NARM that is shipped to the site means less potential for a transportation risk. So I would advocate that you adopt the alternative that keeps NARM to 8,600 cubic feet a year or less with no rollover. In fact, I would like to see the alternative of no NARM wastes, but that would

be included in the EIS. Finally, the US Ecology accepted a shipment of the Spanish NARM waste by air into Moses Lake in July, which I think was mentioned before, but this EIS as we talked about before, fails to address the risks involved in the air transport of radioactive waste, and that's something I find really astonishing because I'm sure folks in Moses Lake and around that region would want to know the risk to them involved in the foreign transport. So I would just hope that would be included in the EIS.

Thank you. Anybody else who wishes to speak? Before we adjourn tonight, I want to remind everybody that written comments may still be submitted to the Department of Health. Address them to Nancy Darling, Project Manager, at the Washington State Department of Health. You can submit them by mail or email, and the deadline they must be received or postmarked no later than November 30, 2000. Well that seems to be the conclusion of the comment. Thank you everybody for attending and we'll adjourn this hearing at this time. Thank you.

**EIS PUBLIC HEARING TRANSCRIPT
KENNEWICK
October 24, 2000**

... October 24. The public hearing section for our Draft EIS and our first witness is Gary Ballew. Would you state your name and spell your name?

Gary Ballew (2)

Yes. Gary Ballew. I'm here representing Benton County; motto, stakeholders representing stakeholders. I'm the sustainable development manager for Benton County and we are addressing the first pending action on relicensing. We will address the two other pending actions in our written comment later by the November 30 deadline. Benton County believes that the current location of the Northwest Compact Low-Level Waste Disposal facility is the best alternative from an environmental and public health standpoint. The facility is centrally located to the majority of the waste producers, I believe which is 90 percent Oregon and Washington. Being centrally located significantly decreases the hazards arising from the transportation of the waste. The facility is in an area of existing radiological contamination caused from years of weapons production at the DOE facilities in the 200 West, 200 East areas. We believe it is unsound. It contaminates pristine areas when existing contaminated areas already exist. Also we believe that any long-term stewardship measures taken by the Department of Energy to mitigate the long-term risk in the 200 West and 200 East areas in the Hanford Reservation will also mitigate much of the smaller risk that's at the commercial facility. The facility is located in an arid region, receiving an average of 7 inches of rainfall per year, thus decreasing the risk of radionuclide transportation to human and ecological receptors. There is a supportive community here and is well educated on the risk associated with radioactive waste and a disposal facility containing such. The community is strong and doing fairly well in an economic diversification mission, lessening environmental justice concerns that plague municipal waste facilities in areas such as Clotis. The alternatives to us seem ludicrous, contaminating clean land, creating regulatory nightmares, the waste was disposed locally rather than regionally, creating long and risky transportation routes to send the waste to other radiologically contaminated areas in Idaho and Utah. Financial surety of the closure funds and potential long-term monitoring funds seems to require that the facility be open until 2056 become financially sure. Benton County strongly encourages Department of Health to approve the five-year license extension for the Northwest Low-Level Radioactive Waste Compact Disposal Facility managed by US Ecology. That's the end of my comments. Thank you.

Next is Carl Strobe.

Carl Strobe (33)

I'm Carl Strobe. I'm wearing a lot of hats tonight. First since we had a lot of comments and questions about ground water and contamination and that sort of thing, I want to tell you that I personally have 25 years experience in the processing, handling, storage, and disposal of hazardous and nuclear waste, both commercial and government generated.

In addition, I designed the 200 ZP1 groundwater pump and treat for the groundwater vadose project on the 200 area plateau. I'm currently providing engineering oversight for that and as I have reviewed the EIS and personally inspected the US Ecology site, it's clear to me that there is no indication that any continued operation of this site will increase any dangers to the public, to the environment, or to the employees of US Ecology. One of the other hats I'm wearing – you've probably guessed already – is I am the Chairman of the Hanford Area Economic Investment Fund Committee, which, as I stated before, consists of appointed directors selected and appointed by the Governor of the state of Washington. This committee has been operation for several years and its mission is to provide diversification of our economy here in the Benton and Franklin county areas. To date, the funds that we have received indirectly from US Ecology, which is our only source of funds, is approximately \$5 million. Every one of those dollars is being reinvested in our local community here for the generation of new businesses and the creation and retention of jobs. To date we have created 500 new jobs directly due to the funding provided from the state of Washington in conjunction with the operation of the US Ecology site. It's crucial that this economic development effort continue to ensure the health and welfare of the citizens impacted by the operations at Hanford. At our last board meeting the Hanford Area Economic Investment Plan Committee unanimously passed a resolution which I'd like to read into the record. This is Resolution 2000-01, a resolution supporting the renewal of US Ecology's license to operate a low-level radioactive waste disposal facility on the Hanford Reservation. Whereas, US Ecology has submitted the request to the Washington State Department of Health and the Washington State Department of Ecology for renewal of their Washington State radioactive materials license to operate a low-level radioactive waste disposal site on the Hanford Reservation. Whereas a draft environmental impact statement for the commercial low-level radioactive waste disposal site, Richland, WA, was issued September 13, 2000, and whereas the Hanford Area Economic Investment Fund was established by the Washington State Legislature, RCW 43.31.422, to support economic development and diversification projects in Benton and Franklin counties; whereas, the Hanford Area Economic Investment Fund is maintained through surcharges paid by waste generators for each cubic foot of waste deposited at the low-level radioactive waste disposal site currently operated by US Ecology. Now therefore, be it resolved that the Hanford Area Economic Investment Fund Committee urges the state to expeditiously complete the EIS process for the commercial low-level radioactive waste disposal facility on the Hanford Reservation, to allow the Department of Health to renew the facility license held by US Ecology Inc. This was approved at the regular meeting of the Hanford Area Economic Investment Fund Committee this 21st day of October 2000. I have a copy for you. Two of my other hats are as a member of the Pasco City Council and as a member of the Board of Directors of Benton/Franklin District Board of Health. I can't speak officially for those two bodies here tonight but as an individual member from both of those bodies, I assure you that this EIS and the relicensing of this activity at the Hanford site has my full support.

Thank you. Mr. Oliver.

Claude Oliver (24)

Thank you. Claude Oliver, Benton County Commissioner. Mr. Ballew already delivered testimony on behalf of Benton County that is in the record and reflected statement well delivered. Mr. Strode also wore multiple hats tonight. I also, as the Chairman of the Board of Benton/Franklin Health District, Benton and Franklin counties, am in firm support of renewal of the license of this project and want to urge you, it continued forward. Previously as a treasurer in Benton County we worked to bring about the \$6.50 surcharge that is now applied and going into \$4.50 the Economic Development Fund and \$2.00 continued to Benton County. I think that was a threshold during 1987 to 1991 when we established this legislation, getting the community involved in terms of diversifying our economy and benefiting from this activity, that really helped a regional approach, a lot of people throughout this region for this service. So we would urge that this service be continued. All indicators are that it is a safe, sane, well defined site, and we want to continue your oversight and your good reporting to the public about what this site is all about. Thank you for holding this hearing and we urge that you renew the license.

Thank you Mr. Oliver. Mr. Peltier.

Jerry Peltier (27)

Good evening. I'm Jerry Peltier, the Mayor of the City of West Richland. On behalf of the City of West Richland, I would like to encourage the Department of Ecology to renew the operational license of the US Ecology. The commercial disposal site has successfully operated since 1965 and has produced significant economic benefits to both the counties and the cities. Some notable benefits are, of course, lease payments to Benton County, consistent fees for the Northwest Compact or customers, and a portion of the fees go directly to support the Tri-Cities economic diversity. The operation has produced no health or safety risk to the public during its 35-year operational history. Future health risks to the public are minimal because the only actual risk would be to the people living directly adjacent to the site, since the site is currently located in the center of the US Department of Ecology site at Hanford, which is a 450 mile square restricted area, exposure to the site would be nonsignificant to the general public. Therefore, public exposure is really not a factor. US Ecology workers are monitored and trained to prevent above normal exposures. The three pending actions proposed by the Department of Ecology, which are the renewal of the existing license, amendment of the Washington Administrative Code and approval of the site stabilization closure plans are the best alternatives to successful and safe operations at the site. These operational enhancements will protect the public health, worker safety, and the environment. In addition to the current mission, the US Ecology site has the potential for accepting FFTF waste if the reactor is restarted. I would encourage the state to explore the potential of disposing of the FFTF low-level waste. Analysis within the EIS and the regulatory documents prepared by the Washington Department of Health and of course the licensee in compliance with the current license, confirm that the facility can be safely operated for at least 50 more years and then closed in accordance with the criteria that the state deems appropriate. Therefore, the City of West Richland would like to encourage you to renew the license and get on with it.

Thank you. Mr. Lane.

Mike Lane (58)

My name is Mike Lane. I live at 1210 Puttin St, Richland, WA. I'd like to comment on the draft statement from my perspective as a retired financial officer for US Ecology customer and 35 years of residence in Richland. I'd like to specifically address the three pending actions. Regarding NARM waste, I believe it is important that all customers of the US Ecology facility that no further limitations be placed on the amount of NARM authorization. Prior to my retirement I was – my company's representative to a collaborative group of US Ecology customers. Our task was to work with US Ecology in formulating a fair basis for disposal charges. As a result of this collaboration effort, the disposal profits at US Ecology's receipts from NARM disposal are shared with their non-NARM customers. This provides industry, hospitals, and universities with the ability to maintain access to such a facility at a low disposal cost, is very important. Since the draft statement suggests, there's no technical reason to lower the current limit of 100,000 cubic feet per year, and since there are tangible reasons to maintain the limit, I recommend no change be made. With respect to licensing renewal; US Ecology has operated the facility in a safe manner for many years. It is a matter of public record that no violations to their license have been noted by the Department of Health for over 10 years. I recommend the license be renewed. And number 3, the closure of older trenches; it seems logical that US Ecology be allowed to proceed with the early closure of the older trenches. I recommend that the closure plan be finalized and work on the closure of the older trenches begin as soon as possible. Thank you.

Thank you Mr. Lane. Mr. Rogers.

Gordon Rogers (71)

I am Gordon Rogers, and I am speaking tonight as a private citizen. However, I am very familiar with this subject. I am a public at large member of the Hanford Advisory Board and vice chairman of the Board's Environmental Restoration Committee which has worked very closely with Bechtel Hanford in development of the groundwater vadose zone project which is the Hanford counterpart on a much larger scale of this effort. While I don't claim to be a professional in this matter, I have long had a great deal of interest in it. In the interest of brevity I will just make three recommendations. First, that you proceed promptly with the renewal of the US Ecology license without any additional enhancements that might further reduce the already very, very small public health and other risks. Second, I would support the continuation with the rollover option of the 100,000 cubic feet per year NARM regulation. And lastly, I support very strongly, the early closure as proposed in US Ecology's schedule of the already filled waste sites, and that you accept, without further ado, their proposed closure plan. I have some further comments, and in the interest of time, I will make those in written testimony before the comment close deadline. Thank you very much.

Thank you Mr. Rogers. Marlene Oliver.

Marlene Oliver (25)

I'm Marlene Oliver. I've been asked to speak to you tonight on behalf of the National Association of Cancer Patients, and I also am going to speak to you as a private citizen. My background is as a research biologist. I have a Master's Degree in terrestrial and freshwater ecology. I also have over 20 years of experience introducing new medical technologies working with everything from small startup companies to companies listed on the New York Stock Exchange. Projects that I have worked on for the last, at least the last year and a half, have lead me to speak with many of these companies around the country and around the world, not just in this area, and many of these companies are located in areas of the United States that are not agreement states, and when I tell them we have a low-level waste site here they have shown great interest and perhaps if not relocating their entire company, but in relocating at least a portion of their company or starting up a new company branch in this region. To give you an idea of what would happen if this license were not renewed, I just came back from a trip to Europe where they are much more reasonable about how they deal with their wastes. They have a lot less regulation at a lot less cost. That's number one. That should be considered in the EIS how we can reduce some of these regulations and costs associated with disposing of some of these wastes and use our common sense in doing so. Number two, if you go into areas where there are not agreement states, if this license is not renewed, this waste from radionuclides, specifically, piles up. In Texas, I've seen it in Texas, in California, in New York. You name it, wherever there's not an agreement state, in hospitals, in parking lots, under stairwells, piled up in hallways. They have no place to put this waste. Not just in hospitals, but most of the medical companies out there, and in the state of Washington alone the growth of the biotechnology industry is at a minimum of 20 percent per year in the numbers of companies that are starting or relocating to this region. So I would urge you not only to in your EIS consider keeping the level of waste at a minimum 100,000 cubic feet per year, but also to include in your estimates the projected growth that some of these companies will show in the level of waste that they contribute to this area, not just from these new companies, but also the increase in research funding that's being conducted at the universities in the region, also in the number of research projects and in continuing development of testing projects done at companies such as Boeing that used radionuclides to test their materials and the strength and the computer industry and etc. All of these companies rely on radionuclides to produce their product and contribute to the economic viability of this community and this region. So please in your EIS consider what the growth of some of these technologies mean, that it will continue to grow because we are in an agreement state and the word is getting out there that we are an agreement state and that we can take this waste. So, as far as cancer patients go, the treatment of cancer with radionuclides is growing rapidly. We are getting more media attention. You will be getting more media attention by helping to further the responsible disposal of waste associated with cancer patient treatments. In many cases people are finding out that radionuclides are the only way to effectively cure, and we can use the word cure now because 5 and 12-year studies are in. Some of these cancers that were previously incurable. Thank you.

Thank you. Laurel Piipo. Oh, thank you. Are you Mr. Fitzgerald?

Yes I am.

All right. We'll go out of order. Mr. Fitzgerald.

Dennis Fitzgerald (47)

Your Honor, this is Nancy Darling – Mr. Goldstein. My name is Dennis Fitzgerald. I'd like to speak to you as one voice, one perspective from life from the trenches of America, not to be confused with the trenches out in US Ecology. I'm concerned just with the one element that is the relicensing. I'm positively for that and particularly I want to talk about the relicensing in relationship to the startup of the FFTF. The FFTF will have the most significant impact in our community and really in the health of the nation in any decision that this Administration has made in the last eight years. American Cancer Society says that 1500 people die each day from cancer. One out of two men in their lifetimes will have cancer. One out of six men will have prostate cancer. One out of three women will have cancer in their lifetime. One out of eight women will have breast cancer. Medical isotopes, particularly now for men with prostate cancer has been a great alternative to the cut and burn type syndrome that they've had to go through in the past and for women with breast cancer it offers relief from having disfiguring surgery. It's a life saving tool. Unfortunately, 90 percent of our isotopes are imported now. I'm very concerned about an organization like the Heart of America Northwest that has 16,000 reported members. They seem to have a disproportion of view, not only in the EIS for the restart of FFTF but also for this operation. Unfortunately, I don't think they fully realize that 40 percent of them will fall in the percentages of more than likely getting cancer, and I assure you after having three cancers removed from myself and two bouts of radiation, and I just finished up 8 months of chemo for colon cancer, that the alternative is a much kinder and gentler one when you have isotopes that are available to you, and unfortunately a lot of the clinical studies are not being started or being delayed because we don't have an adequate supply of medical isotopes. Now why does it have to get back to our issue tonight? Because when FFTF restarts, and I believe it will restart, we have to have the infrastructure in place that will support that. Not only that, it's very important that the Department of Ecology and Department of Health be very supportive and proactive and strategically look at the impact it's going to have on our community so that we can develop what can be the Mayo Clinic of use of medical isotopes in our area. So it's very important that we look at this strategically and how it impacts our area here, and certainly if you take away one of the key elements of the infrastructure that's disposal, you in essence have defeated the purpose of having an effective and cost reductive way of bringing FFTF online. Thank you.

Thank you. Ms. Piippo.

Laurel Piippo (68)

I'm Laurel Piippo, and if it looks wrong, it's probably right. I've lived in Richland since 1951. I'm an expert on garbage disposal. For 51 years I've been putting out the garbage every week and the truck comes along and takes it away out to a place I don't know, but as long as it's where it doesn't stink, doesn't cause disease, doesn't seep into the water,

I see no reason to be concerned. I didn't know that licensing a disposal plant was even an issue until I got about 10 things on my email. Since I hit the big time in USA Today yesterday where I got more press than Gerald Pollet, I'm now an authority. Also when I had surgery for breast cancer in 1989, I knew that they'd cut off my breast and throw it away. I never thought about where they might have thrown it, and when the doctor put a knife in my back and removed my left lung lobe for lung cancer, I never thought about where he threw that lung lobe either. However, when I went out to FFTF for the first time, I've lived here since 1951, I'd never seen all that Hanford stuff out there. I'm a retired teacher, retired travel agent, and I have become a vehement political activist over this issue, because I've had killer cancer three times, and it is incomprehensible to me how Gerald Pollet and his Heartless of America with their policy of suffer and die, don't do anything about cancer treatment or research until you have cleaned up Hanford, because everybody throughout the United States who ever got cancer, got it from Hanford. In fact I wonder why any of them ever come here, because they might get it. So I understand there is a waste dump out there that is a big issue. We create any – any human activity creates garbage. When I went out and visited FFTF because some guy running for governor was having a press conference, a scientist who was there said, FFTF would create about the same amount of waste as two state universities. So I thought well that's a good quotable quote, whatever it means, and I have to take the words of the scientists, but there has to be a responsible way of disposing of waste. I understand that FFTF would create very little waste. It would create medical isotopes for a kinder, gentler treatment of cancer. Marlene, would you get out my shirt so I can wave my flag please? When I became a political activist, long before the Committee for Medical Isotopes was ever thought of, I went out and had my political activist tee shirt made so that when I was not allowed to speak at hearings I would walk all around. This says what you were talking about: The good traditional, it did cure me. I'm definitely alive. Stop/Burn Poison. The surgery, the burn, the chemotherapy till you blister and bleed, the poison with chemotherapy till you throw up and all your hair falls out from head to foot. So then I show them this side: Start FFTF medical isotopes and so get that waste – whatever it is, licensed. I can't imagine anyone being fool enough to say no, let's not license a waste dump. Let's shut it down then they can scatter all the blood, guts and the bandages and the corruption all over under stairwells.

Mr. Smith. You get to follow Ms. Piippo. It's a hard act to follow. Is it Keith Smith?

Keith Smith (32)

Well I represent the Hanford Atomic Metal Trade Council and I can tell you this, that the unions that are represented by that council are in favor in relicensing this site. Not that we have anything to do with operating it, which is probably unusual for us to be so much in favor of something we don't operate, but I do want to say that it is essential, as Ms. Piippo said, to have some place to put things that you don't want to have scattered all over creation, and a good – this site has proved to be a good one in the past, and I believe that it will be a good one in the future and if it's properly managed, it should provide a safe place for us to dispose of hazardous wastes that we don't want scattered through the environment. Thank you.

Thank you very much Mr. Smith. Harold Heacock.

Harold Heacock (15)

I'm Harold Heacock, and I'm representing the Tri-City Industrial Development Council tonight. Tri-Deck is a nonprofit organization whose objective is the economic development and enhancement of the Tri-City area. A membership composed of over 500 business firms, public agencies, organizations, and individuals having an interest in the economic development of the Tri-Cities. These comments represent the views of our membership on this subject. The commercial low-level radioactive waste disposal site, which is located on the Hanford site, has been operated by the US Ecology Company under waste agreement with the state of Washington. The site has operated for over 30 years without significant problems, environmental impact, or hazard to the public. Its contribution to regional public radiation dose rates is insignificant compared to natural background radiation and the radiation releases from the Department of Energy's Hanford site and related cleanup program activities. We strongly support the extension of the lease agreement and continued operation of the site by US Ecology. Specifically, our positions on issues evaluated in the draft EIS are as follows: The radioactive materials license should be extended for another five years. The inclusion of source term limits in the license extension is a reasonable action by the state of Washington to further protect the public. We support licensing of the facility to accept up to 100,000 cubic feet per year of diffuse NARM. This limit is consistent with the current settlement agreement between the state and US Ecology. We support the adoption of the trench closure cover proposed by US Ecology as a standard trench cover for the site. This proposed cover design provides an adequate ___ of protection for the waste with minimal environmental impact. We also support adoption of the US Ecology schedule for the near-term closure of the seven existing waste trenches of the site. Under this option the balance of the trenches would be closed in the year 2056 when operation of this disposal site is planned to be completed. And we have several pages of additional supporting information on the users facility, economic community development, medical and academic research, consistency with DOE operations, and public safety and environmental impacts. And submit that to the record. I also have a statement from the city of Connell, which was sent to me to submit tonight, and I'll submit it for the record. In summary, it supports extension of the license, extension for five years and 100,000 cubic foot per year limit.

Brian Peppindoneau (28)

I'm Brian Peppindoneau. I'm director of Contracts and International Business for Lampson International and Neil F. Lampson, Inc. It's a local family-owned heavy lifting company headquartered here in the Tri-Cities. Our company has had a longstanding business relationship with US Ecology and disposal site. For several decades Lampson has been pleased to team with US Ecology for disposal of extremely heavy waste packages. Just last summer, Lampson provided heavy lifting services to help dispose of the Trojan Reactor vessel at the US Ecology facility. The close proximity allowed us – that close proximity allowed us to observe first hand the diligent efforts of US Ecology to ensure complete and proper adherence to regulations and good practice. We've always known US Ecology a good corporate neighbor and its employees to be assets of the

community as a whole. We at Lampson believe that the commercial low-level waste facility is an important component of the Tri-Cities economic infrastructure. For this reason we urge the state to quickly complete the EIS process to allow the Department of Health to renew the facility license and to allow the facility to continuously provide safe reliable service that its customers are used to. We would also urge the state to approve a closure plan that will allow for safe closure and decommissioning of the facilities in 50 years or so. In keeping with the closure plan, we believe that the decommissioning of some of the older trenches sooner rather later, makes sense. Doing so would improve environmental protection and provide a greater opportunity to evaluate performance of closure caps while the site is still operating, and US Ecology is still on the job. We also think that allowing disposal of at least 100,000 cubic feet of naturally occurring radioactive material makes sense. The DEIS says that there are covers which can be enhanced with bentonite to safely isolate this material, along with the rest of the waste. And the economic benefits to the Tri-Cities are significant. The EIS itself acknowledges that the commercial disposal site employs 24 people. While this number is small, relative to the employment level at Hanford, it does add to employment diversity in this area. And surcharges attached to the waste disposal help bring new industry into the area. For these reasons it makes good sense to complete the process and complete the relicensing effort. Thank you.

Thank you. James Paglieri.

James Paglieri (65)

James Paglieri. I have a handwritten copy of my notes I'll give you. I'll be reading from them for conciseness. The low-level radioactive waste site at Hanford is an important and fundamental part of modern medicine for our citizens. Medical isotopes treatments are increasingly being used successfully for diagnosis and treatment of various diseases, including cancer. An indicator of the potential need is that the lifetime risk of getting cancer is one out of three for women, and one out of two for men. Also, there is a three out of four chance of cancer striking ones family. These grim statistics are based on American Cancer Society data. To deny patience treatments because of failure to provide adequate commercial low-level radioactive waste disposal at Hanford, is not acceptable. Such a facility can be operated safely with minimal environmental impact, as has been shown by past history. The EIS process should be completed and the license granted to continue operation of a low-level radioactive waste site at Hanford. Thank you.

Thank you. Cheryl Paglieri.

Cheryl Paglieri (64)

Cheryl Paglieri, housewife, Richland. Thank you for the opportunity to speak on the extremely important issue of operating a low-level radioactive waste site at Hanford. Like many people we have both lost both relative and neighbors to cancer. Also we have both relatives and friends that are currently suffering from cancer. A sobering statistic is that every 30 seconds an American gets cancer. There are a number of medical isotopes that show great promise in treating cancer and other diseases. For

example, cell directed therapy that seeks out and destroys cancer cells. However, without adequate low-level radioactive waste sites, these treatments will not be available. Living in the vicinity of a low-level site, our home is in Richland, is not a personal safety concern. For example, there would not be a concern with Richland drinking water that is taken from the Columbia River. Also cleanup of the other radioactive wastes at Hanford can and will proceed. Other activities are currently being done at Hanford and cleanup is progressing. Operation of the WNP-2 reactor. Based on a comparison of the risk versus the benefits, clearly the EIS, an operating license for low-level radioactive waste disposal site at Hanford should be issued. Considering the cancer in other patients whose health and very life depend on medical isotopes should definitely be made to renew the license.

Thank you. Amy Evans.

Amy Evans (11)

My name is Amy Evans, and I'm speaking as the Executive Director of a local volunteer organization called the Citizens for Medical Isotopes. You've heard already from some of our members. I'm proud of you guys. Citizens for Medical Isotopes Board, since some of you may not be familiar with who we are, I just thought I'd let you know who some of our Board of Directors are. Jack Briggs, Dr. Al Corado, Dr. Richard Gever at the Cancer Center, Suzanne Heston, Floyd Iving, Mike Lawrence, Rick Lock, Wanda Mon, Ed Ray, Dr. Hackonrogday from the Seattle area who is a world recognized pioneer in developing medical isotope treatment for prostate cancer that uses a procedure called breaky therapy. Ray Robinson, Dr. Robert Shenter and Margaret Yoshino. So this is a statement from this organization. Citizens for Medical Isotopes is a volunteer organization dedicated to furthering medical isotope treatments for cancer and other diseases. We are a group of concerned medical professionals, researchers, patients, and citizens. Medical isotopes are used 40,000 times a day in the U.S. for diagnosing disease. Now new treatments for cancer are moving forward showing promise to more effectively battle this terrible disease and others, by the way. Medical applications for radioactive isotopes are growing. For the public to benefit, the infrastructure for handling the waste must be present. The commercial low-level radioactive waste disposal site at Hanford is a crucial component of the infrastructure that supports medical isotope utilization and ultimately new and better treatments. The low-level radioactive waste disposal site at Hanford receives wastes from hospitals and research institutions around the region, including the University of Washington, Washington State University, and the Oregon Health Sciences University. It will also play a role in supporting the operation of the Fast Flux Text Facility should it be recommissioned for medical isotope production and other purposes. Citizens for Medical Isotopes urges the state of Washington to complete the EIS process for the commercial low-level radioactive waste disposal facility on the Hanford Reservation and allow the Department of Health to renew the license. It can be safely operated for at least 50 more years. During that time it will benefit many people in our region and the nation, through its support of the development of new and more effective treatments for cancer and other diseases. Failing to support the infrastructure behind a new medical isotopes treatments is no different then failing to support the research itself. We owe it

to our friends and family members with cancer to support better research, treatment, and diagnosis. Washington State should also do its part by continuing to make low-level radioactive waste disposal available. Thank you.

Herald Anderson.

Herald Anderson (39)

Herald Anderson, 1106 Wilson St, Richland, and I'm speaking as a citizen of Benton County. Many of you have spoken eloquently to points that I'd like to make, but I'd just like to amplify one point, but first I'll start off by stating that I support the renewal of the site license and the second pending action of adopting an upper limit of 100,000 cubic feet per year, and approval of the cover design and closure scheduled proposed by US Ecology. I also would be supportive of the use of asphalt and large amounts of silt loam that is the best cover that could be put on, because if we look at the investment in terms of 10s of thousands of years, it will be very small. But a lot of people earlier made the point that there's no endeavor that we undertake that doesn't generate some kind of waste. And so I'd like to draw up on you a bit of wisdom from Proverbs 14.4, where no oxen or the crib is clean but much increase comes from the strength of the ox and there are those that are farmers and they support life by hard work. Some of that hard work includes cleanup and so I think that we need this facility and shouldn't shy away from picking up the shovel one more time.

Thank you. Those are the individuals who signed up to testify. Was there anyone who wanted to testify and didn't have an opportunity to sign up? I don't see anyone raising a hand or rushing forward to the microphone. I want to thank you very much for your coming here this evening. I wanted to note that Larry and Nancy will both be on hand here as our meeting ends, if you have additional questions for them, and I also wanted to remind you that the comment period is November 30. Nancy, do you want to say something further with regard to acceptance of written comments after today?

You can send in written comments either via email. My email address is on the information in the back _____. Or you can send written comments to the address. It just needs to be postmarked by November 30 or if it's emailed, it needs to be emailed by midnight that night.

Thank you. There being no further testimony offered, our public hearing is adjourned.

**EIS PUBLIC HEARING TRANSCRIPT
WHITE SALMON
November 14, 2000**

...and the public hearing of the draft environmental impact statement, presented by the Department of Health and the Department of Ecology for the state of Washington. We are in White Salmon, Washington. Today's date November 14, 2000. Administrative Law Judge Jeanna L. Hale is presiding. We have a presentation and if you indicate your name, spell it and the group you represent, please.

Gerald Pollet (29)

My name is Jerry Pollet, and I'm Executive Director. I'm representing Heart of America Northwest, which is a 16,000-member Washington/Oregon public interest group and we've collaborated with other public interest groups in putting together our presentation tonight, and I want to thank you all for getting out in this chilly building and we're going to give an alternative point of view from the Hanford public interest network group's perspective. Let me start with this: what you have here tonight and in front of the departments of Health and Ecology is a question of whether or not our state government is going to breach its trust and fiduciary responsibilities towards our children, our grandchildren, and our grandchildren's grandchildren. Whether or not they're going to breach our state policies and our responsibility to limit the amount of radioactive waste imported to the state of Washington which, in Initiative 383, the public set a policy which is still state law that any increase in radioactive wastes imported is a significant health and environmental threat. 2) That allowing the use of a commercial radioactive waste site for US Department of Energy wastes violates state policies that have been longstanding, and is tantamount to the state of Washington taking a state action to assist the US Department of Energy in reopening the FFTF reactor. Thirdly, why this comes down to such a breach of trust, this EIS clearly demonstrates that this dump site right now poses an unacceptable health risk to future generations. What was left out of this EIS is the fact that the dump site has already leaked hazardous wastes which have already reached ground water, and they will flow into the Columbia River, and they will continue to leach and all the assumptions in this EIS are based upon a statement and a model that wastes couldn't reach groundwater for hundreds of years. But more importantly, why are we adding more wastes to a dump site that's leaking and the Health Department risk assessment already establishes that if you take the least protective cover proposed here and the least protective alternative, 3 percent of Native American children and families exercising their treaty right to live on ceded lands after Hanford is theoretically cleaned up, 3 percent would die of fatal cancers caused by this dump site alone and even without any intrusion into the dump site in the future, this proposal, under the best of all alternatives causes 23 times more fatal cancers than our state law allows for any hazardous waste site. We require, we, the state, and the people of Washington State, and US EPA, are requiring the Department of Energy to have a Hanford cleanup landfill a mile away from this site with liners. Not without liners. Far more protective than this dump site is. And we require the cleanup of ground soil sites at Hanford to be far more protective than the state is saying it's going to license this dump site to continue polluting. What are we talking about? Let me take you through

these points and urge you to comment on them. 1) We believe that the state needs to flat out bar the additional import of 100,000 cubic feet per year of this nonradioactive waste. It doubles the amount of radioactive waste that would be imported, cross the Blue Mountains up by 84, or through downtown Spokane into Washington State. These radionuclides are far more long lived then others in the dump site. In fact, the NARM proposal actually dramatically increases dose and cancer risk from this leaking dump site over the next thousand years. There's no consideration of the import of a thousand truckloads of radioactive waste in this EIS and what the risks are. There's no consideration of the fact that the State Patrol documented that up to 50 percent of individual trucking companies bringing radioactive waste to this dump site had their trucks arrested at the state border for safety violations. 2) Why we need to bar this dump site from taking wastes from the FFTF reactor and plutonium processing operations. Not all radioactive wastes are created equal. The state has a longstanding policy with good environmental cause to say, if we can't regulate the generator of radioactive wastes and we cannot at this time regulate nuclear operations on the Hanford nuclear reservation or any other US DOE site, if we can't regulate your generation, then you can't use the commercial disposal sites which this state is liable for cleaning up. It is the lessee and lessor of this site. It is the operator of this site. We are liable as taxpayers for the pollution from this site. If we open the door to any US DOE waste stream, we open it to all US DOE waste streams under federal law. We also have a horrendous record not considered by the state at all of US DOE violating Washington's hazardous waste laws in failing to characterize the hazardous wastes they've mixed in to their low-level wastes. At Hanford's low-level burial grounds US DOE admits in the past five years they've illegally buried unknown quantities of hazardous wastes in unlined burial grounds. Do we want to be liable for that? So, there are environmental reasons why this EIS must consider this and why it is irresponsible of the state of Washington to either not flat out ban it or you have a legal requirement that you must consider the impacts of taking the waste. Third, we need to have a full investigation and cleanup of the hazardous wastes that are now admitted to be leaking from this site before this site is relicensed. It is unconscionable to admit that belatedly, it's not in the EIS, even though the information was known a year ago, that wastes have already leaked from this site. They exceed our state cancer risk guidelines and standards already in ground water, and the model use for this EIS risk assessment actually says that it's based upon an assumption that the wastes couldn't have moved in 30 years that this dump site has operated. The model doesn't work. The risks are probably far greater then the risks I'm going to be talking about. We're talking about dramatic increases in chloroform and trichloroethylene in late 1999 in groundwater underneath this site. Talking about tritium, we're talking about metals and organics and there's no discussion of the health risks of this in this EIS, nor where they came from, nor how we're going to clean them up. It's unconscionable to talk about relicensing without talking about investigating and cleanup first. What are the risks? The EIS admits, even with it's flawed risk assessment and its flawed model, that 3 percent of Native American children living on the Hanford Reservation after it is open as ceded lands pursuant to the treaties of 1855, would die of cancer from this dump site alone if there is an intrusion into the dump site for a ground water well, which is considered likely under both US DOE and the Health Department scenario. It's an unconscionable

and illegal risk. State law says we have to clean up hazardous waste dump sites to a degree that protects every possible exposed person to a risk level of just one additional cancer for every 100,000 people exposed after taking into account the likelihood that someone will do something in the future like drilling a ground water well there, which cannot be ruled out. Even without the intruder scenario though, every single one of the alternatives proposed by Health and Ecology violate our state hazardous waste cancer risk law by at least 23 times, even without an intrusion. The off-site resident under US Ecology's proposed cap, and it is shocking to hear that this was worked on and agreed to with the state because it is in gross violation of our state Health's cancer risk standards. Forty-four times what is allowed for cancer risk. At best if you shut it down now, 23 times with an enhanced asphalt cap or bentonite cap, if you close it this year. Yes.

What you're saying right now is without any new dumping that is happening right now?

The Health Department risk assessment says if we put on a better cover than US Ecology proposes, shut it down right now, not 2056 but right now, this dump site will still cause 23 times more fatal cancers than we allow for any other hazardous waste site in the state of Washington.

Mr. Pollet, I'm going to give you about another minute to draw this to a close so we can give other people an opportunity.

Okay. I'm going to be taking questions in a minute with others, I take it. The EIS fails to consider replacing this company with a more responsible company, which is a reasonable alternative. It fails to consider the hazardous wastes already leaking from the site. It fails to consider the fact that the company has already used airplanes to import waste to this site, and those of course are risks that are incredible. It fails to increase the financial assurance to stop the company from importing waste by air. We need to greatly reduce the total amount of radionuclides that are proposed to be disposed in this site, not just investigate, but totally reduce the total amount of radionuclides in order to get it into an acceptable cancer risk level. We need to end the practice of using unlined trenches. That is going to be the only way we get to an acceptable cancer risk level. We need to track where wastes are disposed. We need to consider encapsulating them before burying them. We need to have leachate collection. We need to require, in this dump site, everything we require a mile down the road at the Hanford cleanup landfill. Let me just close with this, the state Health Department proposes that it is acceptable under its radionuclide and cancer risk regulation to expose people to 25 millirems of radiation from this dump site off site. A hundred or 500 millirem on-site. The US EPA in 1997 had this to say about the NRC regulation that the state Health Department has adopted and seeks to use here instead of our own state's cancer risk law. US EPA, August 20, 1997, dose limits in NRC's rule are not protective. EPA reviewed the dose limits contained in NRC's radiological criteria the license termination. The NRC rule allows the cleanup level of 25 millirem per year ... these limits are beyond the upper bound of the risk range generally considered protective under CERCLA. That's the federal Superfund law. In addition, they present risks that

are higher than levels EPA has found to be protective for carcinogens, in general, and for radiation in particular, in other contexts. The risk levels corresponding to the 25 to 100 millirem per year range allowed by the NRC rule are unacceptably high. The federal Superfund law allows 10 times more fatal cancers than our state law does. EPA said this standard was unacceptably high. Now it's up to us, the people of the state of Washington, to tell our Health Department to enforce our state law, our state cancer risk standard, and not to allow a state leased and operated dump site to violate it. Thank you all. I'd like to submit a copy of my slides and a letter we sent yesterday to the Governor.

Are there any other individual groups that would like to present an alternative, or are there questions that can be answered? Did you have a question sir, or did you want to make a presentation?

Are we doing questions on the record?

No, we're not doing questions on the record. We are back on the record in the matter of the draft EIS hearing. Mr. Meek, if you'd state your name, spell it and indicate the group that you represent, please.

Tom Meek (21)

My name is Tom Meek, and I'm a radiation protection manager at the Trojan Nuclear Plant. I represent Portland General Electric. I'm a certified health physicist and have been working in the health physics field radiation protection specialist for 25 years. I just want to make a couple general comments in support of the EIS. I'd like to thank the Department of Ecology and Health for a chance to come here and talk about this issue. We'd like to provide our support for the continued operation of the facility. We believe that the state Health and Ecology have been doing a very good job of regulating the facility. That's through our experience with our disposal activities. They're both in regulating through regulations and laws, but also through the inspection process that occurs at the facility with their on-site inspection and the inspection at our facility to ensure our processes and procedures are appropriate for disposal. We feel the disposal facility supports the national objectives having a compact facilities for the disposal of radioactive materials, especially for medical wastes, and that it supports the ability of universities and other research institutions to continue the process of developing treatments for many of the diseases that we're talking about here. As an example, my daughter had Hodgkin's Disease when she was in high school, and through a lot of the work that took place in research facilities around the country, she was treated for the Hodgkin's Disease and now is disease free for four years, and a lot of that was based on the chemotherapy and radiation treatments that she received during that and many of those were proven through the use of radioisotopes that had to be disposed of when they finished the process. The third thing is we believe that the facility has excellent geological and hydrological characteristics, and that it is ideally suited for the disposal of radioactive material, and in fact probably one of the best facilities located in the United States, and that we believe US Ecology's operating the facility in a responsible manner, and support that the facility would be relicensed. Not going to comment on NORM or

NARM. I don't feel it's within my area of specialty. However, I would like to support the selection of a closure plan for the facility. We believe that a closure is probably the most – is the key for the protection of the public and that the facility presently, inactive trenches should be closed and don't support any of the specific closure plans. However, I believe that Ecology and Health and the facility operators should choose one and get that process going. The only other comments I have on the EIS is to do with the method of assessing risk and a lot of people here have been talking about risk and the potential hazards associated with the radiation dose, and I just want to reiterate something that – a comment that was made earlier, and that there are a lot of conservatisms that go both into the dose modeling and the risk assessment associated with the factors that are used in the EIS to determine potential health hazards. The dose calculation models and where you model what happens to them as the material is released from the facility and can move through the environment and reach a human being are very conservative models. They greatly over estimate the hazards that exist in reality. And then on top of that, the linear no threshold model of determining potential hazards, the risk from the radiation dose, is an exceptionally conservative model. There's much data available for the health physics community, the radiation protection community, and indicates that for every study indicating there's a health risk with radiation exposure, there's study indicating there's no health risk at all, is not detectable. When we put all these conservatives together we end up with a result that reached around the area and probable and in fact probably impossible. And calculating a hypothetical deaths based on this we feel is something that when you add all these conservatives together it results in a very emotional and over stated case, and that in fact Health Physics Society in many physician papers, and I'll provide comments of those position papers to you as a national body of radiation protection specialists indicated that any EIS or any assessment of risks needs to include the fact that at very low doses and dose rates you need to include zero as one of the risks. That there is no health risks at these low doses and dose rates, and it should refer to the Health Physics Society's position statement on risk assessment that was issued in April 1995 and the radiation risk in perspective that was issued in 1996 is peer reviewed throughout the United States by radiation protection specialists. Thank you.

Next will be Molly See, then Yellow Thunder, and then John Brodeur. So Molly See, if she's here.

Molly See (74)

My name is Molly See. I was born and raised in Hood River, Oregon, and now I live in White Salmon with my husband, and our children and grandchildren live not far away. I've been concerned for a long time about Hanford, many, many years, and I'm concerned about living here now and I'm concerned for my family. I've tried in many hearings to have some effect. Now after all this, this new EIS boggles my mind. It dismays me. Here are a few points I'd like to see in the EIS; that no FFTF wastes be added to a landfill already leaking. No NARM waste be taken on and that the total amount of waste should be reduced because of cancer risks that exceed our state's standards. Thank you.

Yellow Thunder Woman (79)

My name is Yellow Thunder Woman. I have quite a few comments which I would like to enter into the record this evening. I'm a low dose radiation victim from the early days and because of the high incidences of tumors and thyroid disorders and immune suppression system problems within my own family and among the people that I spend time with and myself we gather a lot of food and use it both for ceremonial purposes as well as just general eating. And so I've ingested these things over a long period of time and I definitely feel the effects in my health as well as my family and extended family. The cumulative risks of this additional waste on this site, in combination with other high and low-level wastes in the area are not addressed. You can't, in my opinion, and I am requesting that you include all of the other contamination factors throughout the entire site, and come up with a more realistic model of how many illnesses and people will be affected and how, based on the fact that there's more than one thing on the site. The draft EIS did not include all health risks, but it assures us that only 3 percent of the Native American children would die from this, and that is unacceptable. It's sick to me to even consider that you would consider going forward with it after making that analysis. Why you wouldn't even just shut the book. It appears to me that you have not included all of the new information that you have in the draft EIS and you've said to me that you don't have time. Well these processes can be extended legally and I would expect that you would do so with the new information that you have at hand with the groundwater. The additional waste at this site are basically 3,000 times the state health standard. The local corner gas station is allowed to produce 1 in 100,000 cancer fatalities, but in the best case scenario in this analysis, there would be two fatal cancers in a thousand people. These are unacceptable and also illegal levels. I would say that my input would be to ban importation of anymore high or low-level waste because it has already been proven that the people managing the site can't handle what's there, or even do the one simple task of stop leaching of existing waste into groundwater. This specific site is inadequate and shouldn't be used because it's unlined, it's completely uncontained. And as a result of that and the past blunders and the not quite truths that you've fed the public, I would say that this facility should not be relicensed. How dead is dead? Is it low-level dead? Is it high level dead? Is it metal dead? Is it radioactive dead? Dead is dead. You have demonstrated that the whole area is susceptible to uncontrolled wildfire, that we've been lied about in the releases from that fire for quite some time and finally they're kind of coming clean about what's been going on up there, and what was actually released in the fire and basically we've never been voluntarily told the truth about the entire system up there. The Department of Health and other agencies, federal agencies as well, have lied and hidden and downplayed the health risks of high and low-level radiation, even in the face of independent and well read studies, which include all the health problems that the Health Department has chosen to ignore. I would also like to say that I do not support any NARM waste coming to this site. In conclusion, I would also like to add that the predicted transportation risk is low statement, is in my opinion, not correct and inadequately addressed. It's just basically not addressed. Transportation of these anticipated wastes increase health risks of many kinds. This is inadequately dealt with in the draft EIS. To be included is the emergency room factor, regional and local hospital emergency room officials and others. Workers there have told me that they are absolutely not prepared to deal with a catastrophic nuclear event.

They couldn't protect themselves physically from the patients who are radioactive and they wouldn't be able to adequately treat them at all. So they, in some facilities they just haven't bothered to do the drill because they couldn't handle it. So that's something that the Health Department has to address in this EIS. EMS, locally EMS response teams do not have the facility, training, or equipment to handle high level, low-level, or moderate exposure to these materials. This information must be included in the EIS with actual facts from all hospitals, ambulance, fire services, and others who would be subjected to handling the catastrophic problems which could arise in transportation accidents, and I do expect to see this in the final. Thank you.

Next is John Brodeur, and then Elizabeth See.

John Brodeur (5)

I have some questions and I'd like to sit down and go through those.

How many questions do you have sir?

A number of questions I'd want on the record.

So just that you're aware, we have several other people who would like to testify and I'm going to give you a little time then I'll probably have to cut you off, and you're certainly free to ask them questions at the end, but there are a lot of people who signed up for the opportunity to testify.

I'd prefer to be on the record.

Well, that's fine, but I'm not going to let you take the rest of the evening.

I understand.

I'll give you five minutes.

That's not enough.

All right, well how much time do you think? In fairness to your neighbors, how much time do you think?

Ten minutes.

I'll give you eight. It's just that we do have at least ten other people who would like to testify and they've been waiting some time to do so.

My name is John Brodeur. I'm a consultant in engineering, geophysics, and geohydrology. I'm also a licensed professional engineer and spent just over 15 years out at Hanford. I had some concerns mainly about centering on a lot of it on plutonium. First of all in August '85, a review by – it was a 1985 review of the facility. The bottom

line is there's at least 80 pounds of TRU waste put in the facility and according to the document it was mainly plutonium in terms of activity on the TRUs waste. The question is if plutonium was received in 1980, my concern again is that it's just now discovering it in the groundwater. The question is, what's coming down the pike, and I guess I don't expect an answer on that right now, but the main thing I wanted to know, I was at the Kennewick meeting, not having read the EIS I did read the little errata sheet that was delivered and I was struck by what I thought was, appeared to me a significant bias on the part of the Department of Health and Department of Ecology. It says here that radionuclides detected in the groundwater include various items; alpha, gross beta, tritium, cobalt, tech 99, and TU39240. I checked into table 23. It shows the plutonium level .006 and then I pulled up the information in the facility investigation report and looked at plutonium wells 3, the value was .24, .25 approximately with an MBA of .06, so it was clearly above _____ a significant in terms of detection level and everything else. Significant detection of plutonium and in well 13. Now well 3, I believe, which one of those is upgradient and the other one is downgradient. Correct me if I'm wrong. One is – no. 3 is downgradient and number 13, the other well where plutonium was detected is upgradient. That was detected at .1 with an MBA of .06. So basically your table .3 is incorrect, but that's not the real significant point, but the question is, here is, if we've got plutonium in the upgradient well, we've got plutonium in the downgradient well, and very low-level, but the significant point is it's there, and the document here correctly assumes that the plutonium, because it's down, it was detected at 30 feet, the plutonium was not from another facility on the Hanford site, but we also detected plutonium in the soil samples in the RCRA investigation and you're familiar with that, I assume. So we've got plutonium in the vadose zone. We've got records of plutonium that has been disposed of at the site. We've got plutonium in the ground water. And then – it says here, it is not possible to determine from the data if the commercial low-level rates at the radioactive waste disposal site is contributing to ground water concentrations. Okay, further samplings can then be conducted. Does that mean that we don't need to worry about that? I mean we can go ahead with this EIS and we can go ahead with this? I'm trying to understand what your reasoning is for saying that there's no – that we can go ahead with this EIS when we don't understand the hydrogeologic system apparently. Maybe you can answer that. I don't know. Problems with your ground water model. First of all it uses a steady _____ infiltration rate which isn't the case. What we're dealing with out there is typically chinooks and massive water melts. It assumes homogeneous layers with constant moisture contents and no heterogeneities in the sediment itself. I've been in a lot of pits and actually been in the low-level burial ground pit, the US Ecology pit and you see it's full of plastic dikes. It's full of stratigraphic and heterogeneities. The model's a one-dimensional model using simple dispersion calculations for in a contaminant transport which is basically totally inadequate. It's the same similar models that they use out at tank farms or to estimate the fission product migration out there and basically we've shown that that's totally inadequate and totally inaccurate in terms of ...

You have another 30 seconds.

I guess I'd like to get at the bias, if I could, in the document. I've talked with three individuals within the Department of Ecology who indicated to me that the team involved

in preparing this EIS clearly went into this thing with a bias that this is the low-level waste site and the health effects are insignificant compared to the rest of the Hanford site, so there's no sense in doing – so this sort of a bias was built into the document and in fact I do see that in the statements. Basically here just dismissing the fact that we've got TCE. In fact there was a statement in there about the plutonium saying that the presence of plutonium does not fit with the model – it doesn't fit with what we'd normally consider the distribution of plutonium. In other words, plutonium doesn't fit our conceived concept of that migration of that – of that radionuclide so therefore it cannot be. That's essentially what the document's saying.

All right, and I'll ask you to conclude at this point Mr. Brodeur.

The other question is, the main concern here is plutonium when it's bound with organics has been shown to be highly mobile. That wasn't considered in this thing. The main problem is you have to answer the question of where the plutonium came from before you can even proceed with this EIS, and how you can continue with the EIS without a phase 3 investigation, without having complete knowledge of the hydrogeologic system or demonstrated knowledge of the hydrogeologic system is beyond me. I can't support issuance of the continuation of the operation of the landfill. I have a lot more.

I understand, but I'm not going to allow you to take over the meeting. I want to take what you have in writing.

When I submit – If I'm going to submit something in writing, I usually end up getting paid for something like that, and I don't see this bias team going into this whole thing. I don't see where it's totally worth my time to do that.

Well you're certainly free to do that, and I will certainly forward any of the written comments that you or anyone else has. Thank you for your time.

Next will be Elizabeth See.

Elizabeth See (73)

I'm Elizabeth See and I am opposed to the reissuing of any permits or licenses for this waste disposal and I'm against the importation of any NARM waste to this disposal or the burial of any waste that can be produced by the FFTF reactor in this disposal. I think it should be shut down completely and no more wastes should be brought into Washington, and no more wastes should be produced in Washington of the radioactive variety. Thank you.

Mr. Greg DeBruler, and I apologize for anyone's name that I mispronounce.

Greg DeBruler (8)

My name is Greg DeBruler, and tonight I'm representing the Columbia River Keeper. We have a fundamental problem with this whole process. One is, this dump site is out of compliance. It has contamination that has impacted ground water and what we really

think is the smart thing to do is stop spending anymore money studying this thing. Shut it down, and if you're going to have to bring in low-level waste, build a new dump that's state of the art. There's no reason that we should be a 19 in the year 2001 practically, dumping waste in an unlined trench. It makes absolutely no sense. And so I think it's unconscionable that the state, either Ecology or Department of Health, could even think about going further and allowing this site to continue dumping more stuff. What's interesting is the site was opened in 1965 and you think back in 1965, how much characterization of waste did they do in 1965? Zip. Probably in 1980 they did very little. Probably in 1990, they did very little. There was a comment that was generated in the back that said they have a 99 percent knowledge of what was dumped in the site and I'm going, yea right! This EIS fails to consider the cultural and natural resources that are there and as far as the protection of the ecology and the ecosystem. In the eco-risk section is four and a half pages long. Granted, it's a dry site. Granted, it's in the middle of nowhere, some people would think, but if you look out in the year 2056 or the year 2100 and you think about the trust responsibility to the tribes, when the Wanapum people were here they were told one thing; we're going to take your land for a while and then we're going to give it back to you. And John Erickson said something really well – thank you John, I love that you're here. We expect one thing of a commercial facility when they come in here, we expect that when you come in do your job, when you leave, leave it as clean as you can, but with a dump site it's really hard to do that. But it is unconscionable to sit here and think that we're going to allow these people to continually dump more waste in there when it's unlined. So alternative number one; deny the license, close it down is definitely the logical one. The other thing that's really missing is that we all get into this little box that we jump into and we say, okay, well we're going to look at this one facility. Well, if the one facility, as the numbers have been reported out, 3 percent chance of the fatal cancer to a small child that's an indigenous person, you have to look at not only that site, but you have to look at the whole site because you have to remember that the person living there might not just live on top of that dump but they might go over to Inn Springs or they might go over to the river and go float down the river, and they might be eating a whole bunch of fish, they might be taking the shellfish off – or the clam shells off the Columbia River and putting them around their neck as necklaces, and a hundred years from now they'll be eating the game, and where's all this dose coming in? And then you have to think about all the agricultural pesticides and everything else that's out there. We fail to look holistically when we look at EISs. We look at one little box. I think the EIS addresses some things kind of expanding out, but I think there's some conservative factors in there. But realistically, if you think about a person living there, in a hundred years from now or a thousands years from now, we're creating a risk that is unconscionable. We're saying, here, we can continue to dump the way we used to dump in 1965 and we don't want to change our practices because we haven't learned. Well, I think we have learned, and the only logical thing is, stop it! Don't license this facility, and build a new one. Other than that, I think I'm done for tonight. Thank you.

Mr. Don Segna.

Don Segna (75)

I'm Don Segna and my concern is that you guys have a job _____ everybody and I think everybody does have a viewpoint and you need to weigh those and obviously I've got my viewpoint and we've heard a lot of other people from both sides, and my feeling is that there is a present need for that site. For one indication there are 500,000 cancer patients a year that die, and what is bad about this whole thing is that most of them have gone through chemotherapy, and not only once, but usually three times, and about 30 percent of those patients died of the chemo versus the cancer. Now Fred Hutchinson Cancer Research Center discovered the use of medicalized targeted medical isotopes so you don't get it all over the whole body. Now I know most of you have heard this story many times, and I guess we have to keep repeating it because we're talking different entities here and that particular concept that they came up with, targeted isotopes to cancer, has now been in research since, when I first got involved in '92 and it's continued to be in research, and not one of the targeted concepts have yet been approved but they should be in the next couple of years and hopefully next year, the first one will get approved, and it's especially for a cancer that is growing quite rapidly, and that's non-Hodgkin's Lymphoma _____ cancer that you may get treated with chemo one year. I mean, get treated for it the first time. You may last a year to five years, but then once you treat it the second time, it's just a progressive nature because you get it again. Now what you need to look at is that you've got to weigh both sides. There's definitely a risk. There's a risk for building a road that we drive a car on. There's a risk of driving an SUV with Firestone tires on it, and all of those have got to be considered. That type of stuff has got to be considered. You cannot have no risk for one side and just let the other risk say, well I'm sorry about that. There's more people saying that you can't have this other risk, we'll allow this risk. You've got to weigh it to be fair to both sides, and that side, if there is needed for those people who produce medical isotopes for both diagnostics and for therapeutic use, and the diagnostics are used about 40,000 times a day in this country alone, and the diagnostic is a way to monitor, detect cancers that otherwise you wouldn't detect soon enough or you'd detect wrong. You give improper treatments as a result of not having these around, and now all of a sudden PET is on the market which now will even show you a function of the cancer. It goes to a cancer that is functioning and you can see it, with very small amounts. Now that PET uses extremely short like isotopes, like 18 hours. We're not worried about this thousand years for that, but there is some waste associated with it that we have to have a place, and it's also dangerous if you don't have a place, what are you going to do with it? You go in some hospitals in California and you'll see them stored under stairways. You've heard this, I'm assuming during the FFTF too, so I hate to keep repeating the same thing over again, but that is there and you need to go investigate that to make sure that you understand the risk to both sides, and I think with that, I'm going to close. Thank you.

Mr. Michael Contini.

Michael Contini (45)

Good evening. My name is Michael Contini. I'm a resident of Franklin County, Washington and a member of the Citizens for Medical Isotopes. Tonight I am speaking

as a private citizen and a cancer survivor. We need medical isotopes. I support the three actions stated in the Washington State Department of Ecology brief. I also support the concepts of covering the trenches as they are filled and the concept of future trenches being lined. These actions must be included in any license granted. There seems to be a great concern regarding the inclusion of FFTF low-level radioactive waste. The opponents to the proposed actions have not read the following statement from the Department of Ecology's brief. If US DOE proposes use of the US Ecology's site would need to notify the Northwest Compact. In addition, US DOE would need to obtain a site use permit from the Department of Ecology and the Department of Health would need to ensure US DOE waste met the site license requirements. This means that the FFTF low-level waste being deposited is a separate reviewable issue. The opposition is clearly using their dislike of anything FFTF to attempt to frustrate the legitimate disposal of natural occurring and accelerator produced wastes. Accelerator produced wastes would come from the processing and usage of accelerator produced medical isotopes. In a USA Today article by Patrick McMann, dated October 23 this year, page 3A, Part of America Northwest, Executive Director, Jerry Pollet, states he would support building a smaller accelerator instead of FFTF restart at Hanford that would make the same kind of isotopes. Mr. Pollet at one time said he would support FFTF if it did not produce weapons materials. He has obviously recanted. We want our cancer patients to believe in Heart of American Northwest and their friends. They say they support medical isotope production but their past and present actions speak louder. I ask the drafters of the DEIS to remember groups such as Columbia River Keeper, Heart of America Northwest, etc., have no accountability for their actions or statements. I see no signatures affixed to their junk sign study. I do not believe any statement that they subscribe to. Thank you for your time.

Mr. Harold Heacock.

Harold Heacock (16)

My name is Harold Heacock, Kennewick, WA, and I'm submitting this statement on behalf of Hanford communities. Hanford communities composed of the local governments immediately surrounding the Hanford Reservation, including four cities and counties, and a number of other governmental agencies. As such, communities are responsible for the health and safety of the residents and are also supported by technically qualified people who are analyzing and aware of the issues related to Hanford. Of ____ communities urge the state of Washington to move expeditiously, complete the environmental impact statement process for US Ecology low-level radioactive waste disposal facility. The facility has operated safely on the Hanford Reservation sine 1965 and serves an important function for this region. It provides a safe, reliable waste disposal option to accommodate waste from medical research and treatment as well as commercial operations. The site is centrally located for waste generators, including Energy Northwest as on average it receives on the average 7 inches of rainfall per year. Remotely located on the Hanford site imposes no risk to the general public and there are no nearby residents. _____ the test facility is restarted it would be ideal to have a waste disposal facility nearby that would dispose of waste without ever leaving the Hanford site. Waste surcharges of the disposal facility provide a

direct benefit to the region by providing revenue to ____ economic development fund that is used to stimulate the local economy. The Hanford communities support three pending actions that are evaluated in the EIS. The license to operate the commercial facility should be renewed. The Washington Administrative Code should be amended to establish a 100,000 cubic foot per year limit for defuse naturally occurring accelerator produced radioactive waste. The site _____ closure plan submitted by US Ecology should be approved. Closure standards and a cover design approved by state regulatory agencies will protect public health and the environment. A safe regulated facility with reasonable disposal costs is of great benefit to the region. It assures that low-level radioactive waste is not accumulated at medical or commercial facilities due to the lack of an appropriate disposal option. The Hanford communities appreciate the opportunity to comment on the actions that are evaluated in the EIS. Signed by Larry Heiler, Chairman.

Thank you. Mr. Daniel Lichtenwald.

Daniel Lichtenwald (19)

The following comments are given by Daniel Lichtenwald, PO Box 1200, Goldendale, WA, on behalf of the Columbia Gorge Audubon Society, in reply to the Washington State Departments of Health and Ecology draft EIS for an existing commercial radioactive waste site operated by US Ecology Inc., at the US DOE's Hanford Reservation. The comments were given at a public hearing at White Salmon, WA, at 14 November 2000. This proposal amounts to further weakening the already inadequate standards at the commercial waste site for protecting all of the inhabitants of eastern Washington in the air, land, and water in which all life in the region depends. The commercial dump, which USE operates by agreement with the state of Washington for the deposit of hazardous toxic nuclear waste has coasted outside of the standards for monitoring and leachate control that apply to similar sites at Hanford. By the state of Washington's own conscionable acquiescence and the operator's priorities, precedences have been made outside of agency and public review for the acceptance of waste from the USDOE enterprise of weapons and labs and even from foreign sources transported by air. Following on the heels of these failures and inconsistencies with the priorities of health and safety, it is now asked that the annual intake of the dump be doubled, that the operator's license for continued bad operation of the site be renewed for five years, and that a plan to close the site in 56 years be approved. On the face of it then, our state agencies suggest that there will be half a century of further intake at double the past rate of nuclear toxic waste at a facility that is inadequately monitored and where leachate is not controlled. Those agencies leave the door open for acceptance of waste from sources far afield, doubling the level of radioactive waste, cruising the highways and byways, and even the skies of eastern Washington. This is deplorable. For it shows that our own state agencies take an approach to eastern Washington that would be more recognizable when a waste entrepreneur is making a deal with a dictator for deposit of toxic trash in a Third World country. The DEIS fails to address cumulative risks for cancer arising from all conditions at the site. It selectively segments that's the Hanford site. It selectively segments components of the proposal and doesn't consider the realistic total impact of what exists and what will be at the site.

The DEIS fails to confirm the state's policy to not accept US DOE wastes, including FFTF reactor and plutonium processing radioactive waste in shipments from other US DOE weapon sites and labs, and in that respect it also fails to consider the types and effects of these wastes in future scenarios. The DEIS abnegates the state's humanitarian and treaty responsibilities by effectively accepting certain increased cancer rates to be born by Native Americans. This is similar to our foreign policy with respect to devastation of Iraqi youth. We think the price is worth it. The DEIS is not worthy of the state of Washington citizens and is not in their interests. Governor Locke and the departments of Health and of Ecology need to rewrite this one.

Ms. Laurel Piippo.

Laurel Piippo (68)

My name is Laurel Piippo. If it looks wrong, it's right. I live in Richland, WA. I've lived there since 1951. There are now 13 Piipos in the family and only one of them has had a problem with cancer. At the Hood River _____ hearings I brought three of my friends and one of them is 88 years old. She lived in Richland since the 1940s with her husband, four children born and brought up there. They have a home on the river and those children played in the river. They grew up and married and she now has 18 grandchildren and 13 great grandchildren, none of who have cancer. You're approaching this from a very localized point of view, I think. Believe it or not cancer exists in Massachusetts. One of my friends wrote to me from Massachusetts telling about six of her various friends and neighbors who had one form of cancer or another. It sounded like they had _____. So cancer does exist some place other than in Washington State. Now, at the Hood River hearing I had some statistics from the American Cancer Society whom the anti-nuke people don't seem to believe. There's a higher incidence of cancer in Hood River County than there is in Benton County where Hanford is. So if you want to have a better, safer environment, you'd better move to Benton County. Now the waste dump out at Hanford, as I understand it, is about 20 miles away from any residential area and I wouldn't be living there with my grandchildren if I perceived it to be a threat. A young lady asked, why are we even considering licensing this waste dump? Well I have a few reasons. I'm a three-time cancer survivor and the first time I came to _____ I had a red tee shirt made. It said, Stop, Cut Slash Burn on the front, and on the back it said, Stop, FFTF, Medical Isotopes. FFTF seems to be an issue in this hearing and I _____ I hope you license the waste disposal facility. I think you should definitely line the trenches and do this cover because I had three major concerns, which I wish we all shared. One is, clean up Hanford. We all know it's a godawful mess, and the government doesn't seem to do a terribly efficient job of cleaning it up. The second is protect our beautiful river, and if it takes putting cover or whatever it is, we all love the beautiful river. We want it to be safe, and you talked about playing in the river, my kids did and their children have. We ate salmon for years and as I say, one out of 13 of us got cancer. I don't like statistics. I'm not a scientist. I taught high school English for 22 years and I sold _____ for 23 years. I'm not a scientist and I'll probably _____ the statistics. But it's my understanding that 40 percent of the people in the United States at some time in their lives will get cancer. I noticed you love the word unconscionable. It is absolutely unconscionable that you should oppose opening a facility that will _____

medical isotopes for a much less agonizing cure of cancer than the current methods. I've had them all, slash burn poison. Slash burning many surgeries; breast cancer twice on the same side, lung cancer once, and also got that kind you get from the sun on your nose. It's not life threatening but if you don't do something, your nose rots off. But I never thought about waste until these hearings came along. I mean, when they cut off my breast I didn't think about where did they toss it. When I had all the bandages and needles and a catheter inserted my chest to administer the poison, the chemotherapy and the thing had to be clean, changed, once a week, I never thought about where the waste was going. When the surgeon skewered my lung and removed it by stabbing me in the back and cutting around, I never wondered what did he do with that lung, but since you're concerned with waste, a major concern why we need this waste disposal is hospital waste. There is all kinds of it and where do you want it? At the parking at Safeway, under the stairway? I never thought about where my 18 cancerous lymph glands were floating around, which I hope they're not. You have to have a contained monitored place for medical waste from hospitals, from universities.

About 30 more seconds.

Oh, I'm just getting wound up.

Well, about 30 more seconds.

I mean other people run off at the mouth, why not me. At least you can hear me, I think. But the side effects, the reason I'm here is for your benefit. Why are we even thinking about FFTF? These are the diseases that medical isotopes can treat. I know that medical isotopes relieve pain from bone cancer. I don't know about rape. A young woman 26 died of brain cancer. Guess what, she lived in Seattle and people brush off, oh, tri-cities. Of course they get cancer. Everybody gets cancer in the Tri-Cities. No we don't. Everybody in Hood River gets it. Also medical isotopes treat thyroid. That is being done successfully on several kinds of thyroid. Prostate. Guys, think about prostate. If there's anything guys can't stand it's prostate cancer. Well you can have surgery where I don't know what they cut off, but I'm sure you'd miss it if they did. Or they can use radiation so that you'll be incontinent and impotent, or you can have a medical isotope. Oh no, medical isotopes. Don't open FFTF. It'll produce as much waste as two universities, according to a scientist, but I know you don't trust scientists. You trust your Heartless of America out there, and I hope that any of you who get cancer or have somebody you love gets cancer, get up in the morning and look in the mirror and say, I did everything I could to prevent a kinder, gentler treatment of cancer. I'm going to read you one more thing. A friend of mine in Richland, he was junior high school teacher for 40 years, and I suppose cancer germs walked it over and got him right between the legs. He says, let's hope Pollet and his anti-Hanford buddies in Seattle never have to hope there's a source for radioactive seeds if they are facing prostate cancer as I did last summer. My radiation oncologist told me she had to get her supply of isotopes from France. See, we import 90 percent of the isotopes we need from Russia and Canada and South Africa. We could be producing them right at Hanford with a minimal amount of waste, which is going to be taken care of by a company that's been in business 35

years. She has never been able to understand why the Heartless of America Northwest is so opposed to the FFTF, a state of the art facility that can produce medical isotopes in this country without burn slash poison, that's the reason.

Thank you.

Ms. Rebecca Stonestreet.

Rebecca Stonestreet (76)

My name is Rebecca Stonestreet, and I represent myself and the Earth. I asked the state of Washington representatives here about the benefits of this relicensing and I proposed one benefit as money and I don't think I really got any other kind of benefits. I believe there was something to do with laws that you have to dump somewhere. The isotope thing I think is a different issue. Again, I'm kind of ignorant about this whole thing but I think that that's a different thing that's going to be produced at the site. We're talking about things going to be coming in to this site, so the isotope thing, I'm going to say for now is not a benefit for what I think the issue we have going on here. I hope I'm right on that, but anyway, what I do is I try to say, okay, were there benefits? Are there benefits? And you know, you come from a government kind of thing and they're kind of money oriented. Where I believe in my heart that organizations such as the Columbia River Keeper and the Heart of America Northwest come from the heart. They go beyond just money. They go beyond just the face value and they look at generations to come. And you know what, that's what we've got to start doing here. Generations to come, okay. So, what I ask, plead, beg, and threaten the state of Washington to do is to not relicense and if you can't do that, then I ask you to ban the proposed additional import and disposal of 100,000 cubic feet of NARM radioactive waste per year. I ask you, plead, beg, and threaten to ban, to require a full investigation and cleanup of the hazardous waste leaking from the site before relicensing the site. That would probably be a really good thing to do. And the last thing is end the practice of dumping radioactive waste into unlined trenches. We're talking about people here. Thank you.

Kathy Carlson.

Kathy Carlson (44)

Hi, my name is Kathy Carlson and I'm here tonight representing my family. I'm a grandmother and I hope there's something left for my great grandchildren by the time we get done. Today on the way over here, just before I came over here, I heard on NPR radio, they said that DOE released a report today saying that the response to the fire that they had in Hanford last summer was delayed by five hours because DOE inadvertently thought that there had been some radioactive release of contamination and so they didn't send the firefighters out there for an extra five hours, so I thought that was pretty interesting, pretty scary. I have a little article here that says, this is August 8, The Oregonian. It says, Hanford will never be clean, the study says. The report was prepared by the National Research Council, which is an offshoot of the National Academy of Science and the National Academy of Engineering. It provides scientific and technical advice under a congressional charter, and what it said was that the sites

will never be clean. The DOE ordered this study and it goes on to say that all the technology that we have today will eventually fail. It's just not going to take care of it. So, I really don't think that we should create or accept anymore waste and that we should close this – that they should not renew the licensing to this. We can see how close we've come to disaster, like this summer at Los Alamos. I read a minute-by-minute description of what happened there and they said that the scientists went into the underground, whatever they have there, and there was 16 of them and a blind dog. The man had gone home and got his old dog and took him in there, and they said when they closed the door they didn't expect to come out because the fire was headed in that direction and there was tons of plutonium there. Three times they said, one ounce was enough to wipe out the city of Denver, so I know what three tons would do, but that's what was stored in that dump there. We didn't even talk about that here, but at the last minute – in two hours they expected to be dead. When they came out the wind had shifted five degrees and that's what kept that facility from burning up and they talked about the fires roaring at locomotion speeds down through those valleys – I didn't know I was going to get so emotional but I just can't see how we can possibly create and keep accepting and pretending that this isn't going to kill every living thing on this earth. We can't keep creating more of it.

Robin Klein.

Robin Klein (18)

My name is Robin Klein. I'm with Hanford Action of Oregon and I apologize, I don't have a big voice but I'm going to try. I want to say that, first, I don't see that this is – that we're really meeting here to discuss the virtues of medical isotopes, and that's not what I wanted to discuss. I came here to discuss the acceptance of additional waste to this site, and I have to say – you know, you have to ask, what are we doing even considering accepting additional or new waste to this site that we all know is – the cliché – it's the most contaminated land mass in the western hemisphere. It's sounding like a cliché, but it's real and it's got a long history of being grossly mismanaged. I don't think anybody on any side would argue that, and we are considering bringing in new waste. New wastes that are not associated with the cleanup of this site, and so I think this goes back to the principles – the very basic principles and policies and common sense that have been iterated and reiterated to the state, to the agencies, over and over again. There are no new wastes to be accepted at the Hanford site or in that vicinity. We can talk about cumulative impacts. We know they're not considered. We can talk about models and speculate on dosages, and those are all in dispute and they're always going to be in dispute, and risks and virtues of medical isotopes and not having medical isotopes, but that's not what this is about. This is on principle and until that site is under control, we'll never know the full impacts of synergistic and cumulative – the way these things add up. We're always going to be debating it, so my comments are simple tonight, and on behalf of my organization in Oregon, which is affected, it's potentially affected by the greater side, part of the greater ecosystem, we urge you not to accept any new additional wastes to this disposal site. Thank you.

Barry Preston. Or is a Marg Preston? Is there anyone else who wishes to testify who's not had the opportunity to do so? Yes sir. State your name please. Come on up.

Scott Bergeron (41)

My name is Scott Bergeron. I didn't know I was going to get a chance to speak. I have a lot of compassion with what this woman said about suffering from cancer. I imagine that is a terrible, terrible experience and to have the hope of a new medicine which can lessen pain and save lives is very worthwhile, it's a very powerful thing. I can only speak for myself. If I was in a position to – in a similar position where maybe I'm about – I have a terminal disease and the doctor holds up to me, I can save you, but my saving you is going to cause the pain and suffering of who knows how many people down the road. We know Hanford's leaking. We know there are poisons coming into the Columbia River. Like the gentleman said before, this is only the headway of what's following behind it. We know that it's been mismanaged. We know that there are trenches without linings in there. When you talk about bringing in more of these chemicals which, how do we know if they're going to leach? Finding a place to store stuff is important. We've got to have medical waste, we do. I've had operations myself. They throw bones away, it's got to go somewhere, but I would never accept taking a cure or a lesser of pain knowing that other people or other animals are going to suffer. It's not worth it to me. Whatever you do to the least of my brothers that you do unto me, and that to me means everything; the fish, the trees, the plants, the water, and I'm not going to poison it just so I might have less suffering. That's not a fair trade, so I suggest that you do not relicense this. I would suggest maybe we could look into building a new plant that's high-tech and will contain these things until alternative cures can be found. I think there are a lot of alternative cures out there that people aren't exploring because the AMA and the Medical Society focuses people's attention onto this one area and they don't really share knowledge that is global and world-wide, and in fact, universal. There are other ways to treat diseases and they're coming out all the time. So I'll just leave it at that. It wouldn't be a fair trade to me. I would not take a cure knowing that someone else or something else is going to suffer in my place, and I think we should not relicense and maybe look into building a new one, a new plant. Thanks.

Is there anyone else who would like to testify who's not had an opportunity to do so? If not, I thank you all very much for your time. Yes sir. We'll give you five minutes, but I'm going to cut you off after five minutes.

You are?

Yes sir.

Commenter Not Identified

I wanted to read from the RCRA facility investigation put out August '99, page 312, talking about radionuclides. While each radionuclide screened above is anthropogenic, not naturally occurring, each appears in samples that were taken at least 30 feet below the original ground surface, where presumably the soils have not been exposed to impacts of past Hanford site operations. And even if they release from the US Ecology

trenches is postulated, the chemical trench is not known to have contained radioactive constituents. They're talking specifically about the chemical trenches. Moreover, the deep distribution pattern of the respective concentrations is inconsistent to the two radionuclides discussed above, and the two radionuclides they're talking about are plutonium and strontium 90. Plutonium 239/240, I believe. So the pattern is neither uniform as would be expected of background values, nor is it indicative of a release, especially when the respective soil retardation factors are considered. In other words, it doesn't fit the model so therefore it can't be. I guess I want to know where they came up with the statement here in the errata sheet? Do you have a copy of that by any chance? Okay, they're talking about the TCE and the radionuclides that were detected, and it says, US Ecology investigation also provided data on ground water below the commercial radioactive waste site. Radionuclides detected include gross alpha, beta, tritium, cobalt, tech-99 and Pu-239/240. In general, the ground water results from the US Ecology investigation show the concentrations for some of the radionuclides and hazardous substances are higher in upgradient wells than in downgradient wells, indicating the source is at least partly from activities elsewhere in Hanford. So what does that mean? Does that mean you're going to ignore the radionuclides, or what was it planned to do about that in this EIS?

Mr. Brodeur, I understand that you're free to ask questions that will be on the record, but the department representatives are not going to be answering them on the record. So if you want to get your question on the record, that's fine, but it's my understanding they won't be answering those questions on the record.

John Brodeur (5)

How come we don't record the answers? Isn't it a question/answer period?

The understanding I have is that the testimony that people have come to give is what is considered part of the record and what is recorded, and people are certainly free to provide...

State officials don't want their answers to be on the record because _____?
(inaudible)

(inaudible)

Fine. In 1985, a letter from the Department of Ecology to US Ecology designated the residents' tanks as extremely hazardous per WAC 173-303. In that letter they requested specific information on the tanks, what was in them. They requested a sampling plan. They also requested a sampling of the soils around the tanks in a statistically relevant manner - statistically relevant for sampling data. In other words, nature and extent of contamination that was released from the tanks, those resin tanks now. Now also they have out there these caissons. That wasn't discussed in there in the EIS. In the caissons they released free liquid out at the low-level burial grounds, in addition to all of the liquid that was released in the 55-gallon drums that were placed out there roughly 25 percent was wet reactor waste for 1978-1980, was all disposed of 55-gallon drums,

which I'm assuming was a fission product or liquid contaminated with fission product and _____ product. Again, the point is that we've got relatively good information that there was plutonium released at the site in liquid form. It was bound with organics. We've got it in the ground water and then the conclusion of the Department of Ecology in the EIS is that, well basically they're attributing it to off-site to another site, and I guess in this case two and two just doesn't add up, and until you can demonstrate that you know where that contamination came from – for instance, the TCE. I looked at the ground water data and tried to determine if there was a path from the WEPs area over to that TCE and clearly it wasn't there. We know it's released there. It was released at the low-level burial grounds. We found it in the vadose zone and we found it in the ground water. So I think that's pretty conclusive evidence that in fact the ground water has been impacted by the waste site. So, this has not been taken into account in the risk assessment. It hasn't been considered in the hydrogeo study which was extremely simplistic, and well essentially what – a quarter of a mile away we've got the ERTA facility, the line, specially designed lined facility to handle low-level waste in a proper manner. I mean, I'm different from a lot of people in the room, and I strongly believe that we have to have a low-level waste disposal facility, but not this one, not an unlined disposal facility when we've got adequate geologic evidence and contamination evidence that an unlined facility is not adequate in this area, especially considering the geology. I think the EIS is bias and what your main job in the EIS is to identify the uncertainties, identify the potential problems and do a sensitivity analysis to try to understand what potential impact those problems could have. That's the whole purpose of the risk assessment and sensitivity analysis is all about. I don't see that in this EIS. You need to do this so that you can properly put the value decision in the hands of the public and so that they understand what the value decision is here, and evaluate the – produce a proper value decision by balancing the potential environmental risks against the need for a low-level waste disposal facility.

Can you take another 30 seconds?

Okay. Back in the – from the 40s to the 60s, we made a lot of mistakes in disposing of our radioactive waste out there in an effort to win World War II and the Cold War. My concern is that we don't seem to have learned anything and a relicensing of an unlined facility, we're making the same mistakes all over again, albeit low-level waste, but it's still the same thing. So I guess that's all I've got.

I have the written statements of three individuals. If anyone else would like to provide written statements, I'll make sure that they get forwarded, otherwise you do have until November 30 to mail your written comments in. My thanks to each of you for coming and for your sincere and well thought out comments. We stand adjourned.