STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

April 20, 2015 15-NWP-076

Ms. Stacy Charboneau, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A7-50
Richland, Washington 99352

Mr. Kevin Smith, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Federal Fiscal Year (FFY) 2017 United States Department of Energy (USDOE) Budget

Dear Ms. Charboneau and Mr. Smith:

As you work with the Assistant Secretary for Environmental Management (EM) to finalize the FFY 2017 budget for your offices, the Department of Ecology (Ecology) recommends five high-level strategies for acquiring the Hanford portion of the EM budget.

1. Invest in worker protection.
2. Support needed funding in other sites' budgets to protect human health and the environment at Hanford.
3. Support cost-effective near-term waste treatment and disposal rather than long-term waste storage.
4. Avoid delaying cleanup work. Delayed work leads to increased infrastructure costs.
5. Avoid delaying cleanup work. Delayed work leads to increased costs to do the actual cleanup, because the work gets harder.

Invest in worker protection

The Office of River Protection (ORP) is taking steps to improve and manage tank farm vapors. Ecology agrees that protecting workers to ensure a safe cleanup should be the highest priority for the Hanford budget.

Support increases in budgets for other EM sites

Securing the non-Hanford EM budget is not your responsibility, but Hanford cleanup experiences delays when other EM sites receive less funding than they request to manage their wastes.

Ecology views the greatest impact of underfunding other EM sites to be a delay in their ability to ship their transuranic mixed waste (TRUM) to the Waste Isolation Pilot Plant (WIPP) for disposal. That in turn has a significant adverse effect on the disposal of Hanford TRUM, which must wait until other sites have completed their shipments.

As Ecology wrote in its FFY 2016 budget letter (14-NWP-077), approximately 20,000 containers of waste remain to be treated and/or disposed at Hanford. About 700 containers in aboveground storage are already deteriorating. Another 12,500 containers are degrading below ground.

Treating and disposing of deteriorating containers of Hanford suspect TRUM could be expedited if other sites receive the funds they need to ship their waste on a compressed schedule.

Ecology also supports increased funding for WIPP to help expedite resolution of WIPP's operational issues. If WIPP can resume, and possibly accelerate, shipments of other sites' TRUM, Hanford waste could be disposed sooner. Shipping Hanford TRUM to WIPP will effectively end the threat it poses to human health and the environment.

Support cost effective near-term waste treatment and disposal rather than long-term waste storage

USDOE plans to store several groups of Hanford waste long-term.

- Tank wastes – ORP plans to manage these wastes in the unfit-for-use Single Shell Tank System for up to 28 more years (Milestone M-045-00).
- Transuranic mixed and mixed low-level wastes – USDOE Richland Operations Office (RL) plans to manage these wastes in deteriorating containers (see above) for up to 14 more years (Milestone M-91-44).
- Sodium-bearing waste – RL plans to manage these reactive wastes for an indeterminate time (M-092-00).

Long-term management of these and other wastes is likely to increase the risk to human health and the environment. The wastes will not be in a form safe for storage or disposal. In recognition of these impacts, the *Federal Facility Compliance Act of 1992 (FFCA)* and the resulting *Hanford Federal Facility Agreement and Consent Order (HFFACO)* require USDOE to have a plan for treating all mixed waste at each facility. Hanford funding must be sufficient to manage that waste in compliance with the priorities and schedules in the *HFFACO* to reduce the risk inherent when wastes remain untreated.

The Acting Assistant Secretary transmitted the EM 2017 budget formulation guidance for programs. In Attachment A of the guidance, the Secretary established a budget priority:

"The minimum resources to meet site and facility permits or other legal requirements and commitments that cannot be delayed by *force majeure*."

The *HFFACO* and Hanford permit schedules for treating mixed waste are included in that priority. Ecology expects the USDOE to comply with that priority and complete waste treatment as soon as possible, and to budget accordingly.

Avoid delaying cleanup work to avoid increased infrastructure costs

In 2012, USDOE forecast a 25-year delay in completing Hanford cleanup. That delay will substantially increase cleanup costs. Hanford cleanup cannot continue without costly repairs and replacements for existing infrastructure. Ecology is concerned about such repairs and replacements reducing funds for managing wastes. For example, Ecology is aware of costly repairs that will be necessary to repair the aging infrastructure now:

- Aging water lines supplying support facilities for Hanford's Central Plateau. Those lines have multiple leaks of hundreds of thousands of gallons per year, which could potentially move radioactive or chemical contamination from the soil into the groundwater. Aging water lines will need to be replaced.
- Three aging "canyon" reprocessing buildings (REDOX, PUREX, and B Plant) have no scheduled demolition date. The roofs on those buildings will need to be replaced to prevent water infiltration onto highly radioactive canyon decks.

As cleanup continues, more costly upgrades to aging infrastructure will be necessary. That replacement and repair will likely consume an ever-increasing percentage of the cleanup budget. Funds to do cleanup will decrease in direct relationship. If cleanup is completed more quickly, some of the cost of future infrastructure repairs and upgrades could be avoided.

Ecology encourages USDOE to identify scheduling and budgeting approaches that would do some cleanup earlier than currently planned. Ecology supports earlier cleanup that will allow the USDOE to shrink the size of the Hanford Site and eliminate the cost for repairing and replacing aging infrastructure.

Avoid delaying cleanup work to avoid increased costs to do the actual cleanup

On Hanford's Central Plateau, there are approximately 1,000 soil waste sites and 1,000 buildings or facilities. Approximately 400 of those buildings or facilities are slightly to highly contaminated. Many of those soil waste sites and facilities have been stabilized only on an interim basis. For example, radioactively contaminated ditches were filled with clean soil to prevent the contamination from moving due to wind erosion or plant or animal intrusion.

After 25 years of cleanup, there are an increasing numbers of incidents of plants and animals intruding into buildings and soil waste sites (like the ditches). The spreading of contamination from interim-stabilized waste sites and facilities creates larger areas to clean up and more volume to dispose.

Ecology encourages USDOE to identify scheduling and budgeting approaches that would clean up some waste sites and facilities earlier than currently planned. Earlier cleanup results in reducing larger areas that are costly to clean up and take extended efforts to plan and fund.

Ecology supports your efforts to complete cleanup. We want to see more rapid, less costly, cleanup that is compliant with the regulations and meets the schedules in the HFFACO. We urge you to work with us and the United Stated Environmental Protection Agency to spend cleanup funds efficiently. We understand that the cleanup is complex and subject to delays, but we stand ready to help you to move forward and claim success.

Hanford cleanup is of great importance to the State and the region. All of us must work to move forward, rather than continuing to delay. The schedule to complete cleanup must not continue to slip. We must not allow potential threats to human health and the environment to grow due to inaction. Ecology supports action; delays cannot be the routine response. Cleanup near the Columbia River is nearing completion. The rest of the Site can experience the same success. It's time to try.

If you have any questions regarding this letter, please contact John Price, Tri-Party Agreement Section Manager, at John.Price@ecy.wa.gov or 509-372-7921.

Sincerely,

Jane A. Hedges
Program Manager
Nuclear Waste Program

cc electronic: Senator Maria Cantwell
Senator Patty Murray
Representative Dan Newhouse
Dennis Faulk, EPA
Mark Whitney, USDOE-EM
Ken Niles, ODOE
Keith Phillips, OFM
Sam Ricketts, GOV
Melinda Brown, Ecology
John Price, Ecology
Ron Skinnarland, Ecology
USDOE-ORP Correspondence Control
USDOE-RL Correspondence Control

cc: Rod Skeen, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Steve Hudson, HAB
Administrative Record
Environmental Portal

Ms. Stacy Charboneau
Mr. Kevin Smith
April 20, 2015

15-NWP-076

cc: NWP Central Files
NWP Reader File