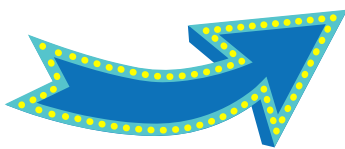


Stabilization of Structures at Risk of Failure

COMMENT DEADLINE: JUNE 29, 2020

WHAT?



The U.S. Department of Energy (DOE) is gathering your comments on its plan to fill three Hanford waste sites with grout that are highly contaminated with plutonium waste. DOE is filling the sites with grout to prevent them from collapsing before the 2030's when the waste is set to be removed.

BACKGROUND

The three sites DOE is planning to stabilize are in the center of the Hanford Site near the Plutonium Finishing Plant. Each site has plutonium contaminated waste at the bottom, with open space between the waste and the top of its container. In 2011, DOE decided to remove, treat and dispose of the waste in these sites around 2030 and DOE has said that is still the plan. Hanford Challenge, the Oregon Department of Energy, the Hanford Advisory Board, the EPA and others have cautioned that grouting now could lead to grout forever. No one wants that to happen.

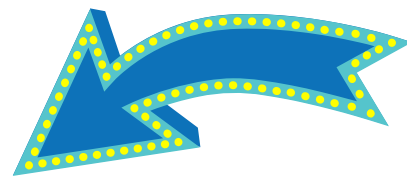
There are other ways these sites could be stabilized to keep them from collapsing before 2030, but DOE did not evaluate other options for these specific sites, which makes it hard to say whether or not grout is the best option.

Because the waste sites are being stabilized as a Time-Critical Removal Action, the project is on a fast track. The contract to fill the sites with grout is already in place and the work is set to begin in July 2020.

Read on to see Hanford Challenge's concerns and sample comments.



HANFORD CHALLENGE CONCERNS



We don't think DOE was justified in using a Time-Critical Removal Action for these sites. Because they fast tracked the stabilization, they never looked at different ways they could stabilize *these specific sites*. We're worried that DOE will change its plan in ten years and leave the plutonium under grout, instead of removing it and isolating it to protect future generations. Altogether these sites are estimated to contain 83.8 kg of plutonium. Plutonium is dangerous in quantities as small as millionths of a gram.

The public is being asked to comment on a process that is going ahead no matter what we say. *So why should you submit a comment?* The Hanford site is full of aging sites and more stabilization is coming, especially as the budget is cut and cleanup is faced with delays. Your comment could change how DOE acts in the future.

SAMPLE COMMENTS

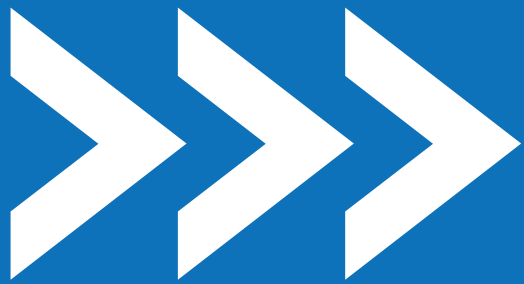
Evaluate Other Options: Look at other ways to stabilize these sites that keep workers, the public and the environment safe AND make it easy to remove the plutonium later.

Involve the Public Earlier: In the future, default to Non-Time Critical Removal Actions for at-risk sites that need attention but aren't an imminent risk. This will ensure a site-specific evaluation of stabilization options and costs and will give the public enough time and information to weigh in with meaningful comments.

Don't Grout and Walk Away: Ensure that the plutonium contaminated waste in these sites is removed and isolated to keep future generations and the environment safe.

Email comments to: AgeingStructures@rl.gov by midnight on June 29, 2020

REFERENCE LINKS FOR MORE INFORMATION



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FOR WASTE SITES 216-Z-2 & 216-Z-9 CRIBS AND 241-Z-361 SETTLING TANK IN THE PW-1 OPERABLE UNIT ON HANFORD'S CENTRAL PLATEAU

Department of Energy Documents

- [Fact Sheet](#) for Stabilization of Structures at Risk of Failure
- [DOE Webpage](#) with all related documents
- [October 2019 Action Plan](#): RL-40 Aging Structures Recommended Action Plan and Summary Report
- [May 2020 Public Meeting Presentation](#) [Need More Info? Contact DOE through Jennifer_M_Colborn@rl.gov](#)
- [2011 Record of Decision](#) for these waste sites
- [2016 Remedial Design/Remedial Action Work Plan](#)

Public Interest and Stakeholder Resources

- [Hanford Challenge Public Comments AND Hanford Challenge Presentation](#)
- [Hanford Challenge Sample Comments](#)
- [Oregon Department of Energy Comments](#) [Need More Info?](#)
- [Heart of America Northwest Presentation](#) Contact Hanford Challenge through
- [Columbia Riverkeeper Comment Guide](#) lizm@hanfordchallenge.org

Environmental Protection Agency Commentary

- [Letter from EPA to DOE](#) regarding the Time-Critical Removal Action: EPA communicates that it will not be issuing a joint action [memo per DOE's request](#) due to the following concerns
 - Lack of site-specific information and lack of details on the stabilization activities provided in DOE's Action Memo.
 - Action memo did not cite the Record of Decision remedies for 216-Z-9 and 216-Z-2
 - Action memo was not consistent with the 2016 Remedial Design/Remedial Action Work Plan (didn't consider the requirements from the work plan)
 - Time-Critical Removal Action was not justified. Should have used a Non-Time Critical Removal Action and provided site specific analysis through an Engineering Evaluation/Cost Analysis.
 - The public should have been better involved in the decision making process.

[Need More Info?](#)

Contact EPA through Emy Laija at
Laija.Emerald@epa.gov