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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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January 20, 1993

Mr. Stephen H. McCracken
ATTN: RI/FS-EIS Comments
US Dept. of Energy
Weldon Spring Site
7295 Highway 94 S
St Charles MO 63304

Dear Mr. McCracken:

Thank you for the opportunity to comment on the draft environmental impact statement (DEIS) for Remedial Action at the Chemical Plan Area of the Weldon Spring Site. We reviewed the DEIS and have the following comments.

1. In general, we are concerned that the Weldon Spring remediation is not being examined in the context of the U.S. Department of Energy's (USDOE) entire Environmental Restoration and Waste Management Program. Both the transportation of wastes between and off of DOE sites and the disposal of wastes at other sites should be explored in the EM-Programmatic EIS. Any decisions on shipping Weldon Springs waste off site should be deferred until the EM-PEIS is complete. Until such steps are taken, we view with concern ad-hoc decisions on the movement of wastes to the Hanford Site.

2. With regard to Option 7c, we have the following specific concerns:

   a. The RI/FS-EIS does not examine the Hanford option with sufficient detail to both understand its impacts on human health and the environment or to compare it to the other options.

   b. There is currently no complain disposal facility at the Hanford Site which would be able to accept the proposed waste. To date, DOE has not demonstrated capacity to meet on-site needs. Until these needs are met, this should preclude further consideration of the disposal of Weldon Springs waste at Hanford.

   c. Before off-site wastes are accepted at the Hanford Site, the consequences of the acceptance should be evaluated in the Hanford Remedial Action - EIS and the proposed Hanford Site-Wide EIS.

   d. The RI/FS-EIS should include a study of preparedness and emergency response along the transportation route.

   e. The costs associated with transporting the Weldon Springs waste to Hanford appear to be great compared to the benefit, if any, of disposal at Hanford.

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3. In addition, the Washington public has repeatedly expressed to our Program their opposition to the importation of additional mixed and hazardous wastes to the Hanford Site.

If you have any questions, please call Mr. Geoff Tallent with the Nuclear and Mixed Waste Management Program at (206) 459-6228.

Sincerely,

M. Vernice Santee

M. Vernice Santee
Environmental Review Section

MVS:
92-7501

cc: Geoff Tallent, Nuc Waste