



# Clean water. Healthy rivers.

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Energy Facility Site Evaluation Council  
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Submitted via email to: [comments@efsec.wa.gov](mailto:comments@efsec.wa.gov)

Dear Washington Energy Facility Site Evaluation Council:

Thank you for the opportunity to provide comments and questions regarding the future of the Columbia Generating Station (CGS), which abuts one of Hanford's most contaminated sites, the 618-11 Burial Ground. The area involved in the State Environmental Policy Act (SEPA) Review and Determination for Columbia Generating Station Warehouse construction is in relatively close proximity to a significant plume of tritium emanating from the Hanford Site, yet the SEPA documents make no mention of this fact, or the potential for dust suppression efforts to further mobilize contaminants such as tritium and nitrate through the area near the ponds that would be involved in construction.

The EFSEC Staff Report states

During construction, clean water will be drawn from an onsite CGS evaporation pond (CGS evaporation pond 2) and dispersed for dust control. This water would follow natural grading during runoff and not flow into other water systems... To minimize the possibility of small quantities of oil, mechanical fluids, adhesive, or gas that could leak from construction equipment, the Certificate Holder will implement several BMPs, including: Training personnel on use of a spill kit that will be located on site; Parking and refueling vehicles on impervious surfaces; Use of secondary containment measures under equipment; Prompt remediation and proper disposal of any spill.

The addendum to the Columbia Generating Station (CGS) EIS regarding the construction of two warehouses on the site and supporting staff memo do not assess the impact to subsurface soil and groundwater resources adequately, a concern since the area is contaminated due to pollution that comes out of the 618-11 Burial Ground. We cannot find enough evidence to support your conclusion that "Due to the small size and scope of this Project and its location on disturbed lands adjacent to an active industrial facility, no cumulative effects of note have been

identified for this Project.” Please note the tritium plume, and the potential for dust suppression water and soil disturbance to alter the movement of contaminants in the subsurface.

Specifically, we believe that EFSEC would be acting prematurely by concluding that these warehouses are acceptable, given the issues that are present very close at the Hanford Nuclear Site, which impact groundwater at CGS. The Project would be located in the northeastern portion of the existing CGS facility, which is itself located approximately 12 miles northwest of Richland, WA in unincorporated Benton County. EFSEC did not provide a map in the staff report, which is an obstacle to developing public comments. Below we offer a map of the groundwater situation in the area, and the location of the 618-11 Burial Ground.



**Source:** The Department of Energy has partnered with the Pacific Northwest National Laboratory on PHOENIX, a family of spatially enabled web applications providing quick access to decades of valuable scientific data and insight through intuitive query, visualization, and analysis tools.

PNNL-Hanford Online Environmental Information exchange provides a single access point to multiple data sets via standard web browsers. PHOENIX also provides data visualization tools and provides explanations of key data sets to aid understanding. This application is based on the innovative technology applied by the Pacific Northwest National Laboratory (PNNL) to access and visualize other environmental data sets at the Hanford Site (PHOENIX Applications). <https://phoenix.pnnl.gov/phoenix/apps/gallery/index.html>

Where will the warehouses be located with respect to the tritium plume, and how will movement of water on the surface and subsurface impact the tritium plume emanating from Hanford’s highly radioactive 618-11 Burial Ground?

The 618-11 Burial Ground releases tritium into groundwater, and nitrate also pollutes groundwater in the area. This groundwater contamination is a long-term problem, emanating from the highly radioactive and toxic waste buried in the 618-11 Burial Ground. Energy Northwest seeks to expand its footprint by building new warehouses, with the end goal of upgrading the facility so that it can produce more power through nuclear fission. The impact of these combined issues is significant, and the introduction of new construction deserves more consideration.

Due to the presence of CGS and its facilities, cleanup of the highly contaminated Burial Ground has been delayed far beyond the original deadlines for Hanford cleanup. According to the Qualitative Alternatives Analysis for the 618-11 Burial Ground, cleanup of the 618-11 Burial

Ground was to be accomplished through a remove-treat-dispose (RTD) approach by 2021, yet the planning for actual cleanup is still lagging due to the presence of CGS:

RTD of the 618-11 Burial Ground was anticipated to be completed by 2021; however, the timeline to begin remediation of the 618-11 Burial Ground has been rescheduled to 2030 due to the continuing operations of the nearby Energy Northwest Columbia Generating Station (Energy Northwest), with the completion of remediation to be determined in accordance with DOE/RL-2014-13-ADD1, Remedial Design Report/Remedial Action Work Plan for 300-FF-2 Soils (as documented in Hanford Federal Facility Agreement and Consent Order [Ecology et al., 1989] Change Control Form M-16-21-06).<sup>1</sup>

Is EFSEC aware of this issue? The extremely close proximity of highly radioactive and toxic buried material adjacent to the area where CGS operates should have demanded coordinated attention from agencies long ago. How will the introduction of new warehouses further complicate or delay cleanup of one of Hanford's most contaminated sites? It is very difficult to know, because the information provided on EFSEC's website did not include maps or a discussion of the interaction of Hanford and CGS' proposed development.

Washington EFSEC must consider the impact of warehouses for expanded nuclear facilities, prolonging the fissioning of nuclear fuel, which builds up highly radioactive irradiated nuclear fuel for which there is presently no disposal path. The Staff Report acknowledges that this project is being pursued to support an increase in power generation from CGS. This is a piecemeal analysis, and it has significant implications for cleanup of the 618-11 Burial Ground, groundwater, and ultimately the health of the people who rely on this area. The Staff Report fails to pursue this issue, giving only a vague acknowledgment about WAC 197-11-060(5)(d)(ii), which states that the decision to not perform a phased review cannot be made "merely [to]...avoid discussion of cumulative impacts.

Realizing that Hanford once promoted "Atoms for Peace," we now ask that you pause and give consideration to the harm that may come to the cleanup if rapid development occurs with only piecemeal environmental analysis. The burden will fall, as it always has, on the people who have lived in the area since time immemorial. This is unjust. EFSEC should deny the request for the warehouses and conduct a robust SEPA analysis for changes in such a sensitive area.

Sincerely,

Dan Serres, Advocacy Director, Columbia Riverkeeper

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<sup>1</sup> Central Plateau Cleanup Company. September 19, 2023. SGW-69455. Revision 0. Technical Memorandum. **618-11 Qualitative Alternative Analysis**. Prepared for the U.S. Environmental Protection Agency. Prepared by U.S. Department of Energy. <https://pdw.hanford.gov/document/AR-26516>