



Nez Perce

ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT
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October 25, 1995

Mr. Robert K. Stewart
U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

Dear Mr. Stewart:

The Nez Perce Tribe Department of Environmental Restoration and Waste Management (ERWM) has received and reviewed a copy of **Description of Work and Sampling and Analysis Plan for Pore water sampling at Groundwater-River Interface Adjacent to 100-D, -K, and -H Reactor Areas, BHI-00620, Draft A**. Enclosed, for your consideration, are the ERWM's specific comments and suggestions on that document.

Since 1855, reserved treaty rights of the Nez Perce Tribe in the Mid-Columbia have been recognized and affirmed through a series of Federal and State actions. These actions protect Nez Perce rights to use their usual and accustomed resources and resource areas in the Hanford Reach of the Columbia River and elsewhere. Accordingly, the Nez Perce Tribe Department of Environmental Restoration and Waste Management is supported by the U.S. Department of Energy (DOE) to participate in and monitor relevant DOE activities. The Nez Perce Tribe Department of Environmental Restoration and Waste Management Program responds to documents calling for public comment from the U.S. Department of Energy.

The Nez Perce Tribe considers the protection of the Columbia River and its ecosystem to be of the utmost priority. The recognition by DOE-RL that chromium-polluted groundwater entering the Columbia River is a hazard to the riverine ecosystem is considered by the Tribe as a positive step forward. The Nez Perce Tribe endorses this sampling program. However, we have some concerns about the plan that we think will improve its thoroughness. Listed below are our specific comments:

- 1) Sample Analyses:
 - a. All sample locations (seep, pore water, and river column) should be tested for total chromium.
 - b. Unfiltered samples should be analyzed.

- c. The detection limit for total chromium should be 10 $\mu\text{g/l}$ or less, not the proposed 80 $\mu\text{g/l}$.

2) Sample Locations

- a. In the 100-D area, the proposed sampled area should be expanded to the Northeast by approximately 3500 feet to coincide with the 100 $\mu\text{g/l}$ chromium contour shown in Figure 2 (map attached) of **Speciation and Transport Characteristics of Chromium in the 100D/H Areas of the Hanford Site, WHC-SD-EN-TI-302**, by E.C. Thornton, J.E. Amonette, J.A. Olivier, and D.L. Haung, dated 7-6-95.
- b. In the 100-H area, the proposed sampled area should be expanded to the Northwest by approximately 4000 feet to coincide with the 100 $\mu\text{g/l}$ chromium contour shown in Figure 2 of **Speciation and Transport Characteristics of Chromium in the 100D/H Areas of the Hanford Site, WHC-SD-EN-TI-302**.
- c. In the 100-K area, the northeast extent of the chromium plume is unconstrained and the sampled area should be expanded to take into account this uncertainty. The contours at the northeast end of the Liquid Effluent Disposal Trench shown on Figure 2 (**Description of Work and Sampling and Analysis Plan for Pore water sampling at Groundwater-River Interface Adjacent to 100-D, -K, and -H Reactor Areas, BHI-00620, Draft A**) are not supported by well control.

The Nez Perce ERWM Office appreciates the opportunity to provide comments on the **Description of Work and Sampling and Analysis Plan for Pore water sampling at Groundwater-River Interface Adjacent to 100-D, -K, and -H Reactor Areas, BHI-00620, Draft A**.

If you wish to discuss Nez Perce ERWM's comments further, then please contact Dr. Stan Sobczyk or Mr. Paul Danielson at 208-843-7375 or 208-843-7378 (fax).

Sincerely,



Donna L. Powaukee
ERWM Manager

cc: John Wagoner, DOE-RL, Site Manager
Kevin Clarke, DOE-RL, Indian Programs
Mike Thompson, DOE-RL
Dave Holland, Ecology
Larry Gadbois, EPA,

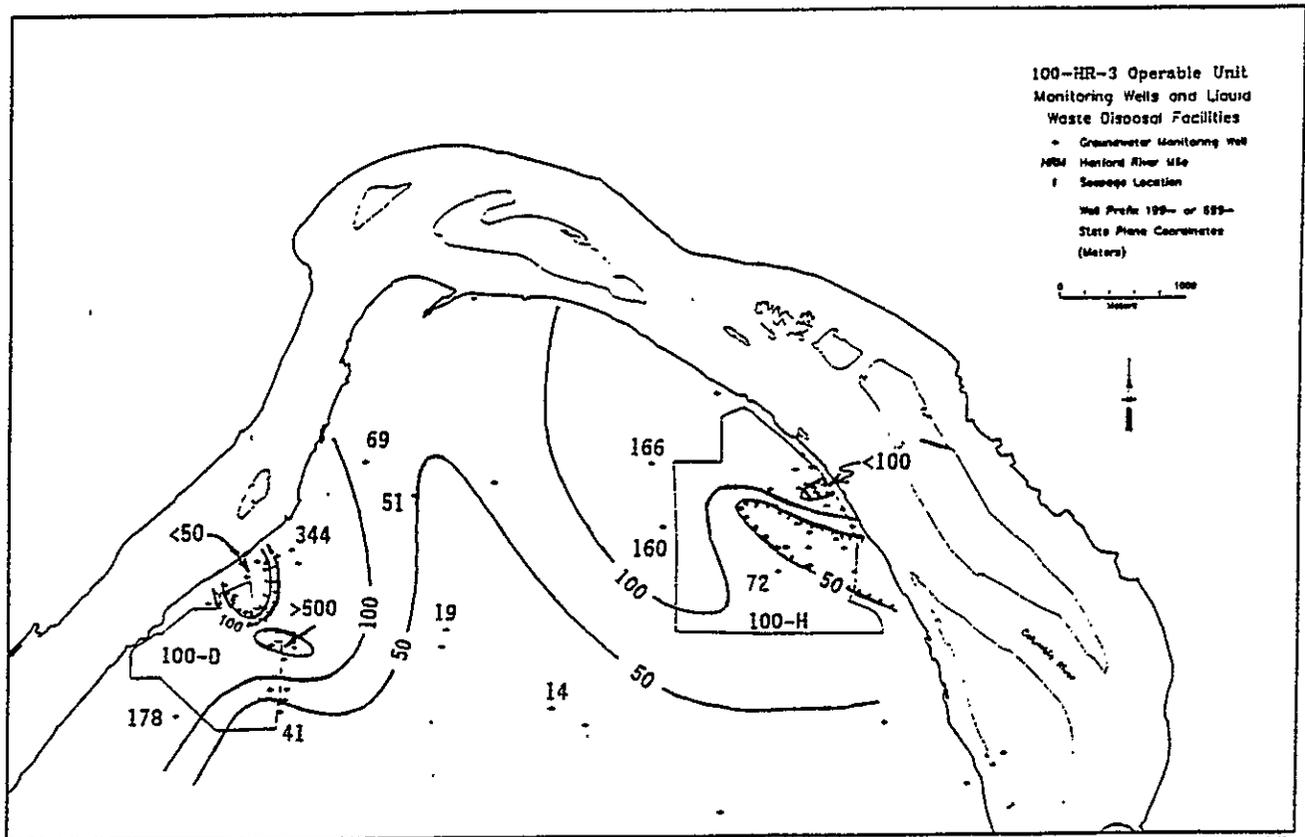


Figure 2. Chromium Distribution in the Hanford Site Unconfined Aquifer of the 100-D and 100-H Areas. Data shown is total chromium concentration values in ppb for filtered groundwater samples collected in October of 1992.