



Confederated Tribes and Bands
of the Yakama Indian Nation

February 13, 1996

Mr. John D. Wagoner, Site Manager
U.S. DOE, Richland Operations Office
P.O. Box 550 (A7-80)
Richland, WA 99352



Dear Mr. Wagoner,

This letter routinely forwards information requested by the Columbia River Comprehensive Impact Assessment Study under Bob Stewart's able leadership. The information has to do with comments on the Identification of Contaminants of Concern document, PNL-10400, UC-630, DRAFT. We would appreciate your forwarding this to Mr. Stewart.

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The purpose of the CRCIA is declared to be "... to determine if enough contamination exists in the Columbia River to warrant cleanup actions under applicable environmental regulations." (COC, pp. iii) The Yakama Indian Nation is concerned that the screening presented for contaminants that are of concern from a regulatory perspective isn't complete or adequate. Furthermore, critical areas of high local contamination along the Hanford Reach, of particular importance to the Yakama Indian Nation, may not be adequately described by the contaminants chosen due to the non-representative screening approach used. The contaminants selected must adequately describe local effects of concern within the Hanford site. The Yakama Indian Nation believes that the following conditions must be met by the contaminants of concern set:

1. Contaminants of Concern must include all the components of potential concern from a regulatory compliance perspective, in addition to all the primary contributors to human health risk or ecosystem risk. All applicable regulatory criteria must be applied in the screening.
2. The screening approach must identify all contaminants that have the potential to significantly contribute to local hazards on the Hanford site and to bioaccumulation in the food web.
3. Contaminants whose detection limits are higher than the applicable regulatory concentration limits must be carried in the contaminants of concern set.

4. Concentrations to be used for screening contaminants of concern from a regulatory point of view are at the point of compliance. For ground water mixing with surface water, this is groundwater concentration measurement point nearest the surface prior to mixing, not the well mixed concentration in the surface water (down river).
5. The set of contaminants must include the largest contributors that account for 90% of the human health, ecosystem, or cultural impacts at all Locations of Concern.

We recognize that the pressures of inadequate funding and short time available will tend to force an abbreviation of the Contaminants of Concern. This should be handled by explicitly dealing with a subset of the COC for the current study, if necessary.



Russell Jim, Manager
Environmental Restoration and
Waste Management Program

cc: Kevin Clarke, DOE/RL
Robert Steward, DOE/RL
Roger Dirkes, PNNL

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