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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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April 5, 1993



Eric Goller
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Dear Mr. Goller:

Re: Columbia River Impact Evaluation Plan (M-30-02)

Ecology transmitted comments on the CRIEP July 15, 1992. The scope of the CRIEP was delineated in a meeting September 8, 1992. Comment resolution meetings were held, and some comments were resolved. Chapter five of the CRIEP contains the "plan" itself, while the first four chapters might be characterized as background and justification. At a meeting on November 6, 1992, Ecology agreed to cease comment resolution and direct its approval review only at chapter five.

USEPA transmitted comments to USDOE, dated March 3, 1993, on draft B of the CRIEP. Ecology generally concurs with USEPA's comments, and is not submitting a separate set of its own comments. One observation with which Ecology disagrees is that the pseudo-qualitative risk assessment "proved an appropriate and productive approach to identifying additional data collection or interpretation needs." Ecology was unable to discern either from the text, or from lengthy discussions with the authors, the analysis that led from the first four chapters to the "plan" in chapter five.

Ecology adds two additional comments. First: the first sentence of activity 4-3 on page 98 is incorrect in stating that the NCP requires the environmental evaluation to focus on critical and sensitive habitat. The NCP requires that environmental evaluations assess threats to the environment, especially sensitive and critical habitats. Second: Chapter five does not specify that existing and future data be entered into HEIS and that spatial data be collected in State Plane Coordinates (NAD 83).

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We look forward to completion of the CRIEP. Please do not hesitate to contact me to resolve these concerns. My phone is (206) 459-6675.

Sincerely,



Steve Cross
Nuclear and Mixed Waste Management Program

SC:lj

cc: Paul Day, EPA
Steve Wisness, USDOE
EDMC. (administrative record)

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