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TRI-CITY INDUSTRIAL DEVELOPMENT COUNCIL

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June 30, 1997

Mr. Robert Stewart
U.S. Department of Energy
PO Box 550 - MS HO-12
Richland, WA 99352



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DOE-RL/DIS

Dear Mr. Stewart:

COLUMBIA RIVER COMPREHENSIVE IMPACT ASSESSMENT

The following comments reflect the views of the Tri-City Industrial Development Council (TRIDEC) on the subject document. TRIDEC is an organization devoted to the economic stability and development of the Tri-City area. Our membership is composed of over 650 local businesses, labor, industrial firms, organizations, and individuals having an interest in the Tri-City area's economy. We have been designated by the Department of Energy as the one voice spokesman for the business community on Hanford related issues.

As an organization devoted to the economic vitality of the Hanford area, we are concerned that the clean-up of the Hanford site proceed in an expeditious, economical, and defensible manner. It is apparent that with levelized or decreasing budgets available for the Hanford cleanup programs, expenditures must be directed towards achieving clean-up to acceptable standards in the most economical method available. Currently the Department is unable to meet its legal commitments for the clean-up program under the Tri-Party Agreement within available funding. The diversion of even limited amounts of clean-up funds for activities not directly related to TPA milestones is not considered to be defensible.

In our review of the "Screening Assessment and Requirements for a Comprehensive Assessment"(DOE/RL-96-16 Rev O) report, we do not find sufficient justification to support the diversion of currently limited cleanup program funding for the performance of the proposed comprehensive assessment. Accordingly, we must oppose any utilization of Hanford clean-up funding for the performance of the proposed studies. If funding for support of the proposed program can be obtained from sources other than the EM-30 or Hanford budgets, we would not oppose the proposed studies, with some modifications to the currently proposed program. Our reasons for this position are discussed below.

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- The study results presented in Part I of the report provide an assessment of the current status of the Columbia River based on currently available information. However, the evaluation of the data provided is considered to be flawed and is not suitable for policy decision making.
- The study did not utilize a risk assessment methodology which realistically reflects potential risks to the public and the environment. Without this data, decisions regarding potential public impacts cannot be made.
- The public and environmental impact assessments are based upon current conditions in the river and do not reflect expected results from current Hanford clean-up program commitments.
- The determinate analyses utilized in the report we believe overstates the probable actual exposure to the public or to the environment by the use of maximum contaminant level data.
- The habitation scenarios are not realistic for current public access and future land use planning by all public agencies. An example of this is that the resident site occupancy and agricultural scenarios are not compatible with the Indian nations proposed land use restriction on the Hanford site.
- The analyses of the data obtained did not follow accepted scientific methods for evaluating risk in that only a single data point was deleted from each data set. A more appropriate method would be the determination of a maximum exposure based on composite data. A data error band analyses was not utilized.
- As stated in the report, the analyses presented a maximum exposure risk to the public or the occupant based on maximum exposure scenarios and data analyses.
- No data or analyses contained in the report provides evidence of any public or environmental risks which require immediate corrective action beyond that already identified under the Tri-Party Agreement.
- Radio-isotopic analyses does not include allowances for decay of the radioactive materials in the assessment analyses.
- The majority of the heavy metal concentrations identified in the river are derived from upstream or atmospheric sources, not from current Hanford releases. The study and correction of any hazardous conditions resulting from non Hanford sources are beyond the scope of the Hanford clean-up program.

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Our conclusion after reviewing the report is that the data reported does not support the need for immediate corrective action on the part of the clean-up program beyond that currently committed under the TPA.

We believe that the report needs to be re-examined to identify any immediate or future concerns regarding public health and environmental issues more realistic future resource utilization scenarios. If additional problem areas resulting from Hanford site releases are identified they should be included in the TPA following public review and debate.

Hanford clean-up funding should not be "stolen" for the proposed comprehensive assessment unless a clearly defined path for and the need for additional data collection is identified. Data collection for undefined future purposes should not be supported from limited Hanford clean-up funds. The report does provide a clear and supportable need for the performance of additional studies of Hanford related issues.

This issue is similar to other proposals to utilize Hanford clean-up funds such as the proposed Agency for Toxic Substance and Disease Registry studies. Non clean-up programs such as these should be supported from other sources such as separate Congressional appropriations instead of already limited EM clean-up funds. If separate funding for this purpose can be obtained from other sources, we would not oppose the performance of the proposed CRCIA studies; although their direct application to the Hanford clean-up program has not been identified.

Please contact us if you have any questions regarding our views on this subject. We appreciate the opportunity to provide you with our comments.

Very truly yours,



Sam Volpentest
Executive Vice President

C: Lloyd Piper