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STATE OF WASHINGTON
DEPARTMENT OF FISH AND WILDLIFE

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4 January, 2000

Bryan Foley
U.S. Department of Energy
P.O. Box 550, MSIN: HO-12
Richland, WA 99352

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EDMC

Dear Mr. Foley:

Subject: Comments on the *200-CS-1 Operable Unit RI/FS Work Plan and RCRA TSD Unit Sampling Plan* (Work Plan), DOE/RL-99-44 Draft B.

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The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to comment on the Work Plan. It is our understanding that the Work Plan provides the details and approach for characterizing chemical, radiological, and physical conditions at the waste sites in the 200-CS-1 Operable Unit.

As part of the site characterization, the regulators and U.S. Department of Energy (USDOE) should recognize the benefits of sampling biological receptors to define the nature and extent of radiological and chemical contamination; establish pre-remedial conditions; and assist in the evaluation, selection and design of a remedial alternative. By establishing pre-remedial biological exposure levels, USDOE will be in a much better position to determine whether the selected remedy has actually reduced or eliminated exposure levels to biological receptors. Unfortunately, in this Work Plan, USDOE is not proposing to collect biological data, which could be used to define the nature and extent of radiological and chemical contamination; to support an evaluation of risks; and to assist in the evaluation, selection, and design of a remedial alternative.

Part of the field investigation/characterization activities and sampling analysis plan should include an on-site biological assessment. This would accomplish the following 3 objectives: 1) establish/confirm source receptor contaminant pathways, 2) identify areas of concern for biological receptors, and 3) assist in establishing cleanup criteria that are protective of the environment and federal trust resources.

Biological data are needed as part of the characterization effort to assist in the selection and design of a remedial alternative that is protective of the environment. We encourage the collection, at a minimum, include ground beetles, small mammals (deer/pocket mice), and plant species found at the waste sites.

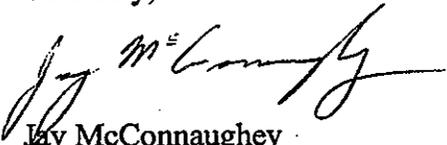
Mr. Foley
4 August, 1999
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We believe employing an analogous site concept to characterizing the waste sites is inappropriate because the types of contaminants released are unknown and could vary from site to site. This concept is riddled with errors. For example, poor characterization of waste sites, which excluded sampling biota, and implementation of an analogous approach has raised concerns about DDT at remediated sites in the 100 and 1100 Areas.

Finally, we have determined that many of our comments on the 200 Area Implementation Plan (see enclosure) remain applicable to this waste group. We would like these comments addressed here as well.

Again, thank you for the opportunity to comment. If you have any questions regarding these comments, please contact me at (509) 736-3095.

Sincerely,



Jay McConnaughey
Habitat Biologist, Hanford Site

Enclosure

cc w/out encl:

Hanford Natural Resource Trustee Council
Susan Hughs, Chair

L. Cusack, Ecology

R. Skinnerland, Ecology

T. Clausing, WDFW

✓ 200 Area Administrative Record