



**Department of Energy**  
 Richland Operations Office  
 P.O. Box 550  
 Richland, Washington 99352

01-ERD-041

FEB 27 2001

Mr. Jay McConnaughey  
 State of Washington  
 Department of Fish and Wildlife  
 c/o State of Washington  
 Department of Ecology  
 1315 W. Fourth Avenue  
 Kennewick, Washington 99336

**RECEIVED**  
 MAR 13 2001

Dear Mr. McConnaughey:

**EDMC**

RESPONSE TO STATE OF WASHINGTON DEPARTMENT OF FISH AND WILDLIFE  
 JANUARY 4, 2000, COMMENTS ON THE "200-CS-1 OPERABLE UNIT RI/FS WORK  
 PLAN AND RCRA TSD UNIT SAMPLING PLAN," DOE/RL-99-44, DRAFT B

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Thank you for your comments on the subject document. Please accept my apologies for the length of time it has taken to provide you with a response to your comments. As you know from my telephone call several weeks ago, I had only just discovered, through my conversations with John Price, State of Washington Department of Ecology (Ecology), that you had provided those comments.

In response to your comments, the U.S. Department of Energy Richland Operations Office (RL) recognizes the importance of biological receptors in its management of waste site cleanup. The 200 Area remedial action objectives address prevention or mitigation of risk to both human and ecological receptors as well as preventing destruction of sensitive wildlife habitat and adverse impacts to threatened and endangered species. Recent discussions between RL, Ecology, and the U. S. Environmental Protection Agency (EPA) have been focused on refining and formalizing a process for the 200 Area Remedial Action Project to evaluate and document the information on biologic receptors that will be used in making remedial decisions. These discussions are expected to conclude in the near future and we plan to share the proposed strategy and give you an opportunity to provide us with your comments.

With respect to the information that is currently available, RL has performed numerous biotic sampling programs in the 200 Areas. Much of this information can be found in the following documents:

- Historical Records of Radioactive Contamination in Biota at the 200 Areas of the Hanford Site, Johnson et al. (1994), WHC-MR-041;
- Near-Facility Environmental Monitoring Annual Reports (now published by Fluor Hanford, Inc.);
- Hanford Site Environmental Reports published by Pacific Northwest National Laboratory; and

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- Site-specific sampling reports, such as Ecological Sampling at Four Waste Sites in the 200 Areas, Mitchell and Weiss (1995), BHI-00032.

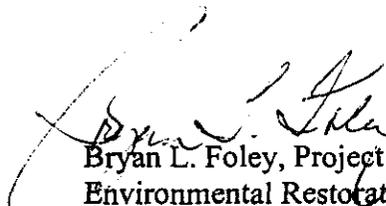
Several biotic samples have been collected on or adjacent to 200-CS-1 representative waste sites (e.g. 216-A-29 Ditch, 216-B-63 Trench, 216-S-10 Ditch). Many different species of plants and animals have been collected and analyzed, including insects and small and large mammals where known or suspected contamination is present in the 200 Areas. These studies have been valuable in identifying potential receptor pathways and areas of concern for both biological receptors and waste management operations. In addition, as part of the Remedial Investigation report, existing ecological data such as those presented in the Annual Hanford Site Environmental Data Reports, will be reviewed to refine the conceptual exposure model.

The establishment of cleanup criteria for the 200 Area is an ongoing process. At this time, the primary land use for much of the 200 Area is expected to be industrial-exclusive (i.e. waste management for the foreseeable future). A conservation (mining) land use has also been identified for those areas on the perimeter of the 200 Areas outside the industrial-exclusive land use area. RL is working diligently with Ecology and EPA to reach consensus on how to implement improvements to the ecological risk evaluation process. With the advent of the new Model Toxic Control Act regulations and their focus on terrestrial ecological evaluation, the project is evaluating what must be done to align the 200 Area Implementation Plan with those new requirements.

I look forward to meeting with you and Ecology's representative, Mr. Price, in the near future to discuss our current thinking on completing a 200 Area-wide ecological evaluation.

If you have questions, please contact me, on (509) 376-7087.

Sincerely,

  
Bryan L. Foley, Project Manager  
Environmental Restoration Division

ERD:BLF

cc: B. H. Ford, BHI  
C. D. Wittreich, CH2M  
J. Price, Ecology  
L. Triechel, EM-43  
D. R. Sherwood, EPA  
Admin Record, H6-08 (200 Area)