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

08-AMRC-0059

DEC 18 2007

Mr. Nicholas Ceto, Program Manager
Office of Environmental Cleanup
Hanford Project Office
U.S. Environmental Protection Agency
309 Bradley Blvd, Suite 115
Richland, Washington 99352

RECEIVED
DEC 20 2007
EDMC

Dear Mr. Ceto:

NO EFFECT DETERMINATION FOR REMEDIATION OF 100-B-17 WASTE SITE

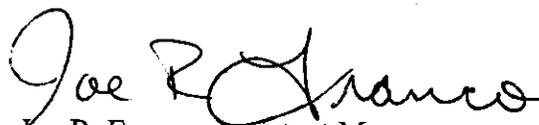
The River Corridor Contractor is planning to remediate the 100-B-17 waste site along the 100-B/C Area shoreline. The activity will consist of picking up miscellaneous surface debris and transite siding below the Ordinary High Water Mark during the winter low flow period.

In accordance with the *Endangered Species Act of 1973* and the *National Environmental Policy Act of 1969*, as amended, activities occurring below the Ordinary High Water Mark of the Columbia River Hanford Reach require an evaluation of the impact to the Upper Columbia River (UCR) steelhead (*Oncorhynchus mykiss*), designated as a federally threatened species, and the UCR Spring-run Chinook salmon (*O. tshawytscha*), an endangered species.

The evaluation of the planned remediation resulted in a determination of "no effect" to UCR steelhead and the UCR Spring-run Chinook salmon. This evaluation was concurred with by National Marine Fisheries Service via an electronic mail (email). The memo documenting the determination and the email correspondence are attached for your use as the action agency to document in the Administrative Record, as deemed appropriate. Ms. Laura Beulow of your staff has reviewed the attached documents.

If you have any questions, you may call me or your staff may call Chris Smith, of my staff, on (509) 372-1544.

Sincerely,


Joe R. Franco, Assistant Manager
for the River Corridor

AMRC:DCS

Mr. Nicholas Ceto
08-AMRC-0059

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Enclosures

cc w/encl:
Laura Buelow, EPA
Administrative Record, A3-01

cc w/o encl:
K. A. Gano, WCH
D. D. Teel, WCH

Interoffice Memorandum

136751

TO: J. M. Capron, X3-40

DATE: November 14, 2007

COPIES: K. A. Gano, H4-21
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E. M. Weiss, H4-21

FROM: D. D. Teel *for*
Environmental Science
H4-21/372-9029

Thomas E. Marceau

Records and Document Control H4-11

SUBJECT: **ECOLOGICAL AND CULTURAL RESOURCES REVIEWS FOR REMEDIATION OF THE 100-B-17 WASTE SITE (07-ER-061)**

This memo is in response to your November 6, 2007, request for Ecological and Cultural Resources Reviews for your proposed cleanup activities at the 100- B-17 waste site located along the shoreline in the 100-B/C Area. The site is approximately 350 meters upstream of the 181-B River Pump House (see attached map and photo) and consists of scattered debris including nails, metal pipes, metal fasteners, concrete, and transite siding. The debris is scattered along approximately 100 meters of shoreline between the high and low water marks. The proposed project is to pick up and properly dispose of the transite pieces and other large debris during the fall and winter when river levels are low. No excavation is planned for this activity. The debris will be picked up by hand and loaded onto a light-weight rubber-tired vehicle with attached trailer to be hauled out. No grading or road preparation will be conducted in the shoreline or upland area in order to minimize impacts. A small amount of grading may be needed to allow access off the borrow pit haul road.

Ecological Review

Environmental Science staff inspected this site on November 5, 2007. This activity will occur below the ordinary high water mark (OHWM) during the fall and winter period of low river flow rates. Most of the transite is located on a gravel bar below the riparian vegetation and is only accessible during low flows. The upland area is gently sloping with thin soils covering river cobbles becoming more rocky at the riparian zone. Access to the site will be over the rocky soils to the area below the riparian zone. The vegetation in the upland area is characterized by gray rabbitbrush (*Chrysothamnus nauseosus*), Sandberg's bluegrass (*Poa sandbergii*), and cheatgrass (*Bromus tectorum*). There are also upland areas that contain Russian knapweed (*Centaurea repens*) which is a noxious weed. The access route should avoid these areas to prevent spread of knapweed to other areas. Because of the gentle slope and the rocky substrate in the riparian and shoreline area, no impacts to existing vegetation are anticipated.

The riparian area where access will be made to the shoreline continues to be gently sloping and vegetation is dominated with reed canarygrass (*Phalaris arundinacea*) that transitions to small stature common native and non-native forbs and sedges before giving way to the non-vegetated gravel bar.

Within the Hanford Reach of the Columbia River, the Upper Columbia River (UCR) steelhead (*Oncorhynchus mykiss*) is designated as a federally threatened species and the UCR Spring-run Chinook salmon (*O. tshawytscha*) is designated as endangered.

To avoid impacts to fish and shoreline habitat, the following strategy must be implemented. All project activities must be conducted during the fall and winter low flow period (November through January) when the shoreline areas are dry. No grading or excavation is allowed below the OHWM and access will be limited to a rubber tire vehicle on the rocky substrate. These mitigation strategies will prevent impacts to the species listed above and no effects to Upper Columbia River (UCR) steelhead, UCR Spring-run Chinook, or the designated critical habitat of either species are anticipated.

Prior to initiating these project activities, notification must be made to US Fish and Wildlife Service, Washington Department of Fish and Wildlife, and the National Marine Fisheries Service. Environmental Science staff will make this notification.

If there are any changes in the scope of activities that could result in disturbances outside of the description of this project, please contact Ken Gano at 372-9295, to schedule a follow-up Ecological Resources Review.

Cultural Review (NPE# 2008-100-003)

The 100-B-17 waste site consists primarily of corrugated transite siding dumped on a section of the Columbia River shoreline upriver of the 181-B River Pump House. A reconnaissance survey conducted on November 5, 2007, indicated that the debris was dumped on a section of shoreline that is frequently inundated. Site inspection coincided with a period of very low water, so the full extent to the site was observed. Materials observed other than transite included scrap metal, glass, and ceramic pieces indicative of Hanford Site operations. No archaeological resources were observed. This finding supports previous work conducted in the project area. The project location includes aquifer sampling location No. 4. Surveys conducted in advance of aquifer tube installation in 1997 did not observe or record any cultural resources in the project area or along the access route (see HCRC # 97-100-021, CCN 050418).

Nearest Archaeological Site:

Archaeological site 45BN446 is located outside the perimeter fence on the mid-terrace of the Columbia River approximately 500 m east of 100-B-17. This site will not be affected directly or indirectly by project activities. No other archaeological, historic-archaeological, or historic sites are located in proximity to the waste site.

Given the location of the collecting activity on exposed river cobble and the surface nature of the debris, we believe that this project is not the type with the potential to cause effects to historic properties.

Although no cultural resources are anticipated, all workers must be directed to watch for cultural materials (e.g., bones, stone tools, mussel shell) during all work activities. If any cultural materials are encountered, work in the vicinity of the discovery must stop until a Cultural Resources Specialist has

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been notified, the significance of the find assessed, appropriate Tribes notified, and if necessary, arrangements made for mitigation of the find. In the event of any discoveries, please contact Tom Marceau at 375-4663 or Jim Sharpe at 372-9111.

KAG:TEM:

Attachment(s): Map and photo

