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STATE OF WASHINGTON
DEPARTMENT OF FISH AND WILDLIFE

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29 April, 1998

NMWWP - Kennewick

Phil Staats
Washington Department of Ecology
1315 W. 4th Ave.
Kennewick, WA 99336

APR 29 1998

KENNEWICK

Dear Mr. Staats:

RE: Comments on the 100-N Area Corrective Action Cleanup Documents (DOE/RL 97-22, DOE/RL-96-102, DOE/RL-97-30, DOE/RL-96-39, and DOE/RL-95-111)

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Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to provide comments on the aforementioned documents. Our interests are the protection of aquatic organisms and spawning habitat of upriver bright fall chinook salmon *Oncorhynchus tshawytscha* and white sturgeon *Acipenser transmontanus*, and critical habitat of upper Columbia River steelhead *Oncorhynchus mykiss* from the hazardous substances of the 100-N Area released to the Columbia River.

The 100-N Area has multiple contaminants of concern which must be addressed by the proposed remedial actions of the 100-NR-1/100-NR-2 Operable Units. The 100-NR-2 groundwater operable unit affects the shoreline site of the 100-NR-1 operable unit. Proposed interim actions should not foreclose final remedial actions which address all contaminants of concern above maximum concentration levels.

Interim actions

100 NR-1

WDFW concurs with the interim remedial actions for the 100 NR-1 sites.

100 NR-2

WDFW concurs with the interim remedial action of the Sr-90 pump and treat while an evaluation of the effects of tritium, Sr-90, and hexavalent chromium on aquatic receptors is performed. The pump and treat establishes a hydraulic gradient preventing the other contaminants of concern from reaching the river. Furthermore, the effectiveness of the interim remedial action should be evaluated.

Evaluation of Sr-90 impacts to aquatic and riparian receptors

WDFW strongly agrees with the tri-party agencies that "more information must be obtained to determine whether Sr-90 concentrations are causing short- or long-term impacts to these [aquatic] receptors" and that "further evaluation of potential impacts to aquatic and riparian resources is considered a vital part of the proposed interim action". The contaminated groundwater is an exposure pathway to aquatic receptors, and aquatic receptors are currently exposed to contaminants of concern. WDFW requests studies be

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initiated to evaluate the impacts to aquatic receptors. We are dismayed that studies have not already been initiated.

Terrestrial Evaluation

Terrestrial cleanup is occurring in the 100 Area. As part of the cleanup effort in the 100-N area, WDFW urges USDOE to initiate a moderate level biological evaluation of contaminants to terrestrial and avian species, and cooperatively work with WDFW, U.S. Fish and Wildlife Service and the Hanford Natural Resource Trustee Council in developing the biological studies. WDFW also would encourage the evaluation be expanded to include the entire 100 National Priority List site.

Final remedy

WDFW has not been provided adequate information to enable us to make any recommendations toward a final remedy for the 100 NR-2 operable unit and the shoreline site of the 100-NR-1 operable unit. In addition, U.S. Department of Energy (USDOE) has not presented a reasonable range of remedial alternatives that would meet the cleanup goal of year 2036. Although one alternative (i.e. soil flush/pump and treat) meets this time frame, we have serious concerns with it, particularly with the associated impermeable barrier.

Our concerns remain relevant on the permeable barrier alternative of the 100-NR-2 Operable Unit. Please reference our correspondence dated 18 October, 1996 from Ted Clausen, Regional Director, to David Olson and Phillip Staats regarding *Comments of Concern on the In Situ Treatability Test* which states our concerns with a full scale permeable barrier.

We strongly encourage USDOE to seek technologies that will reduce the remedial time frame to meet the overall cleanup goal of year 2036, minimize ecological impacts, and be protective of the aquatic resources and shoreline. Once USDOE develops additional alternatives that can meet these objectives, USDOE should perform another corrective measure study.

Irreversible and Irrecoverable (I&I)

WDFW would like to point out to USDOE project staff that USDOE is a trustee and has responsibilities to the public concerning natural resources. The documents include I&I language identifying commitment of resources for each alternative response action. We believe such commitments are appropriate only after full mitigation, including compensatory mitigation, has been provided. It should be clearly stated that the intent of the I&I statements are being included as important public information, not as an attempt to circumvent natural resource damage liability.

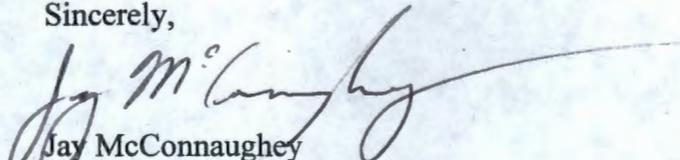
Conclusions

The Corrective Measures Study is deficient due to a lack of environmental analysis, and as such, it is premature to consider final remedial alternative(s) and/or corrective action(s). Studies need to be initiated to evaluate impacts from tritium, Sr-90, and hexavalent chromium to aquatic receptors.

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Thank you for the opportunity to comment. If you have any questions regarding these comments, please feel free to contact me on (509) 736-3095.

Sincerely,



Jay McConnaughey
Habitat Biologist, Hanford Site

cc:
Hanford Natural Resource Trustee Council
Geoff Tallent, Chair
Melanie Preusser, Admin. Sec.
David Olson, USDOE
Steve Alexander, Ecology
Ron Skinnarland, Ecology
Ted Clausing, WDFW