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State of Washington
DEPARTMENT OF FISH AND WILDLIFE

1701 S. 24th Ave., Yakima, WA 98902-5720 Tel. (509) 575-2740

December 21, 1999

Mr. Doug Sherwood
U.S. Environmental Protection Agency
712 Swift Blvd., Suite 5
Richland, WA 99352

RECEIVED
JAN 12 2000
EDMC

Dear Mr. Sherwood:

Subject: Request for Establishment of a Biological Technical Assistant Group at the Hanford Site

The Washington Department of Fish and Wildlife (WDFW) requests the establishment of a Biological Technical Assistance Group (BTAG) at the Hanford Site. We believe that a BTAG would provide valuable advice to remedial project managers; ensuring that ecological assessments properly consider biota exposed to hazardous substances and that Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) environmental protection mandates are met.

The main role of a Hanford BTAG would be to assist remedial project managers with the collection and evaluation of information needed to assess ecological effects. BTAG would do the following:

- Assist in streamlining the remedial process by ensuring ecological investigations are relevant to remedial objectives during an initial site review
- Assist with scoping the ecological assessment and recommend modifications to original work scope that can save time and money
- Recommend types of biological data needed to adequately characterize ecological risks
- Provide advice on sampling and analysis plans, ecological risk assessments, and ecological implications of remedial decisions

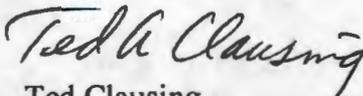
We strongly suggest that U.S. Environmental Protection Agency seek biological contaminant expertise from the U.S. Fish and Wildlife Service, U.S. Geological Service National Biological Division, National Oceanic Atmospheric Administration and the National Marine Fisheries Service, as these agencies' contaminant experts would be appropriate participants on a BTAG.

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Currently, we are observing a recurring theme (i.e. the lack of an adequate ecological assessment, and in some cases, no assessment) in the remedial investigation/ feasibility study (RI/FS) process that prevents us from determining whether selected remedial actions are protective of biological receptors. This is occurring for soil and ground water operable units in the 100 Area, 200 Area, and 300 Area National Priority List sites and needs to be corrected. As a consequence of ecological assessment inadequacies in the RI/FS process, de-listed sites in the 1100 Area and 100 Area are being dealt with under the natural resource damage assessment process.

We believe that a BTAG at the Hanford Site would benefit remedial project managers and improve the protection of biological resources. We would be happy to discuss this proposal with you in more detail. We also believe that the tribal representatives and other federal and state trustees should be in attendance. Please contact Jay McConnaughey of my staff at (509) 736-3095 to coordinate a meeting.

Sincerely,



Ted Clausing
Regional Habitat Program Manager

TC:JM

cc:

Hanford Natural Resource Trustee Council

Susan Hughs, Chair

Keith Klein, USDOE

U.S. Environmental Protection Agency

Pat Cirone

Michael Gearheard

Michael Wilson, Ecology

Administrative Records

100 Area

✓ 200 Area

300 Area