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

NOV 22 2005

06-AMRC-0045

Mr. F. Dale Bambrick
Eastern Washington Branch Chief
National Marine Fisheries Service
(NOAA Fisheries)
304 South Water Street #201
Ellensburg, Washington 98926

Mr. Erick Bartrand
State of Washington
Department of Fish & Wildlife
1701 South 24th Avenue
Yakima, Washington 98902-5720

Ms. Jane Hedges
State of Washington
Department of Ecology
Nuclear Waste Program
3100 Port of Benton Blvd.
Richland, Washington 99354

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

Mr. Greg Hughes
U.S. Fish and Wildlife Service
3250 Port of Benton Blvd.
Richland, Washington 99354

Addressees:

REMEDICATION OF THE 600-202 WASTE SITE ON THE HANFORD SITE

Reference: EPA, 1999, Declaration of the Record of Decision for the Interim Remedial Action for the 100 Area Remaining Sites: 100-BC-1, 100-BC-2, 100-DR-1, 100-DR-2, 100-FR-1, 100-FR-2, 100-HR-1, 100-HR-2, 100-KR-1, 100-KR-2, 100-IU-2, 100-IU-6, and 200-CW-3 Operable Units on the U.S. Department of Energy Hanford Site. Benton County, Washington EPA ID #WA38900900076 and WA1890090078

This letter serves as notification by the U.S. Department of Energy, Richland Operations Office (RL) of the planned remediation of a near-shore waste site located south of the old Hanford

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Townsite (Figure 1 of Enclosure). The 600-202 waste site is identified in a Record of Decision issued by the U.S. Environmental Protection Agency (EPA) and the State of Washington Department of Ecology (Ecology) as required action to protect human health and the environment.

Steelhead and spring-run Chinook salmon are listed as endangered species in the Hanford Reach of the Columbia River. The 600-202 waste site is near the shoreline, and this notification is to inform the National Marine Fisheries Service (NOAA) and the State of Washington Department of Fish & Wildlife of a project that could have the potential to impact these species and their habitats. The U.S. Fish and Wildlife Service (USFWS) is also included because the site is adjacent to the Columbia River and within the Hanford Reach National Monument.

The site was a landfill that received waste materials from the Hanford Construction Camp. Preliminary sampling indicates the presence of non-radioactive contaminants in four trenches of the waste site that are above cleanup criteria outlined in the Record of Decision (ROD). Waste materials found include tar and asphalt roofing, sheet rock fragments, metal, wood, ash, glass fragments, bottles, mammal bone fragments, lead battery plates, copper wire, nails, metal piping, and a vehicle engine block. One of the trenches is within approximately 30 feet of the top of the natural shoreline terrace. The planned remediation will involve removing debris and sampling to verify the cleanup is complete. Although it is not expected, there is a potential for contaminated soils to extend through the terrace requiring the excavation of this material. As a precaution, a silt fence backed up with straw bales, will be installed above the ordinary high water mark (OHWM) to prevent any materials from reaching the shoreline or the river. No excavation is planned to occur below the OHWM at this time. If it is determined that contamination extends beyond the silt fence and remedial action is required below the OHWM, consultation with NOAA Fisheries will be initiated to determine a path forward that will prevent and mitigate impacts.

An ecological review was conducted at the site to determine if any plant or animal species of concern would be impacted and was documented in correspondence from D. D. Teel to J. E. Laurenz, dated July 20, 2005 (Enclosure 2). The findings of that review determined the vegetation on the 600-202 waste site and surrounding area was burned by a wildfire in the summer of 2004. Perennial grasses including Sandberg's bluegrass (*Poa sandbergii*), needle-and-thread grass (*Stipa comata*), sand dropseed (*Sporobolus cryptandrus*), and salt grass (*Distichlis stricta*), and forbs including diffuse knapweed (*Centaurea diffusa*) have begun to grow back on the site. The findings also identified the need to prevent impacts to the shoreline and the river because of the endangered steelhead and spring-run Chinook salmon.

The ecological review of the site concluded that no species or habitats of concern are present in the upland area and no impacts to ecological resources at or surrounding this site are anticipated. Since all remediation activities will take place above the OHWM and a silt fence will be in place, this remediation project will not adversely affect steelhead or spring-run Chinook salmon or their habitats.

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On September 26, 2005, a site walk-down was provided to Mike Ritter (USFWS) outlining the planned remediation, mitigation, and restoration actions. Mr. Ritter agreed that the silt fence and restoration were the appropriate actions. When the remediation is complete, the silt fence will be removed and the site will be backfilled or re-contoured and revegetated as prescribed by the regulator approved plans. In the event the terrace is breached during the remediation process, the silt fence will be left in place until the area is stabilized with vegetation.

This project is considered a waste sit remediation activity that is briefly described in the U.S. Department of Energy Hanford Site Threatened & Endangered Species Management Plan – Salmon & Steelhead (DOE/RL-2000-27, Rev. 0. A review of the ecological impacts from this project concludes that this remedial action project will not affect endangered spring-run Chinook salmon, steelhead, or their habitats.

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

Sincerely,



David T. Evans, Acting Assistant Manager
for the River Corridor

AMRC:DCS

Enclosure:
IOM, D. D. Teel to J.E. Laurenz,
“Ecological Resources Review
for Remediation of the 600-202
Site (05-ER-019),” dated July 20,
2005

cc w/encl:

M. A. Buckmaster, WCH
R. L. Donahoe, WCH
J. W. Donnelly, WCH
D. A. Faulk, EPA
K. A. Gano, WCH
J. B. Price, Ecology
J. J. Sharp, WCH
D. D. Teel, WCH

Administrative Record (100-IU-2/100-IU-6)

Environmental
Restoration
Contractor

ERC Team
Interoffice Memorandum

122214

Job No. 22192
Written Response Required: NO
Due Date: N/A
Actions: N/A
Closeout CCN: N/A
OU: 100-IU-6
TSD: N/A
ERA: N/A
Subject Code: 0280, 6500

TO: J. E. Laurenz, H9-02

DATE: July 20, 2005

COPIES: S. D. Bigham, X3-16
M. A. Buckmaster, X3-16
J. W. Donnelly, X0-17
K. A. Gano, H0-23
A. L. Johnson, H0-23
J. A. Lerch, L6-06
B. J. Marshall, X3-16
J. J. Sharpe, H0-23
Document and Info Services, H0-30

FROM: D. D. Teel, Project Manager
Risk Assessment and Site Closure
H0-23/372-9633

SUBJECT: **ECOLOGICAL RESOURCES REVIEW FOR REMEDIATION OF THE 600-202 SITE (05-ER-019).**

This memo is in response to your July 5, 2005, request for an Ecological Resources Review of your project to remediate the 600-202 solid waste site. The 600-202 site is located down river from the Hanford Townsite on the upper terrace above the Columbia River (see attached maps). The Remedial Action Project plans to remediate four trenches based on results from confirmatory sampling conducted earlier this year and stock-pile soils west of the site. There is a potential for the excavation of two additional trenches and that the excavation could extend through the terrace of the river bank to the ordinary high water mark (OHWM), should the extent of contamination exceed current design plans and expectations. This site has been previously reviewed for ecological resources prior to confirmatory sampling. Findings of that survey are documented in Ecological Review number 04-ER-036, dated November 30, 2004 (CCN 117786). Results of that survey found the 600-202 site and surrounding area to have been burned by a wildfire in the summer of 2004. Perennial grasses including Sandberg's bluegrass (*Poa sandbergii*), needle-and-thread grass (*Stipa comata*), sand dropseed (*Sporobolus cryptandrus*), and salt grass (*Distichlis stricta*), and forbs including diffuse knapweed (*Centaurea diffusa*) have begun to grow back on the site.

Natural Resources staff conducted an additional site walk down with design staff on June 9, 2005 to evaluate impacts from the potential expansion of the excavations as mentioned above. No sensitive plant or animal species of concern were observed within the project limit as it is currently designed; however, this site is within an area of established native perennial plant species that provides nesting habitat for ground nesting birds. This remedial action project should be scheduled to start August through February, outside of the nesting season, to avoid any impacts to the project schedule. If this project is scheduled to start March through July, natural resources staff will need to conduct an additional field visit to ensure no nesting birds are present. Disturbance from the remedial action activities must be kept to the minimum necessary to complete the task. Only the equipment that is directly associated with the remedial action project are allowed off of the established roads. All other

J. E. Laurenz
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vehicle traffic must be directed to stay on the established roads.

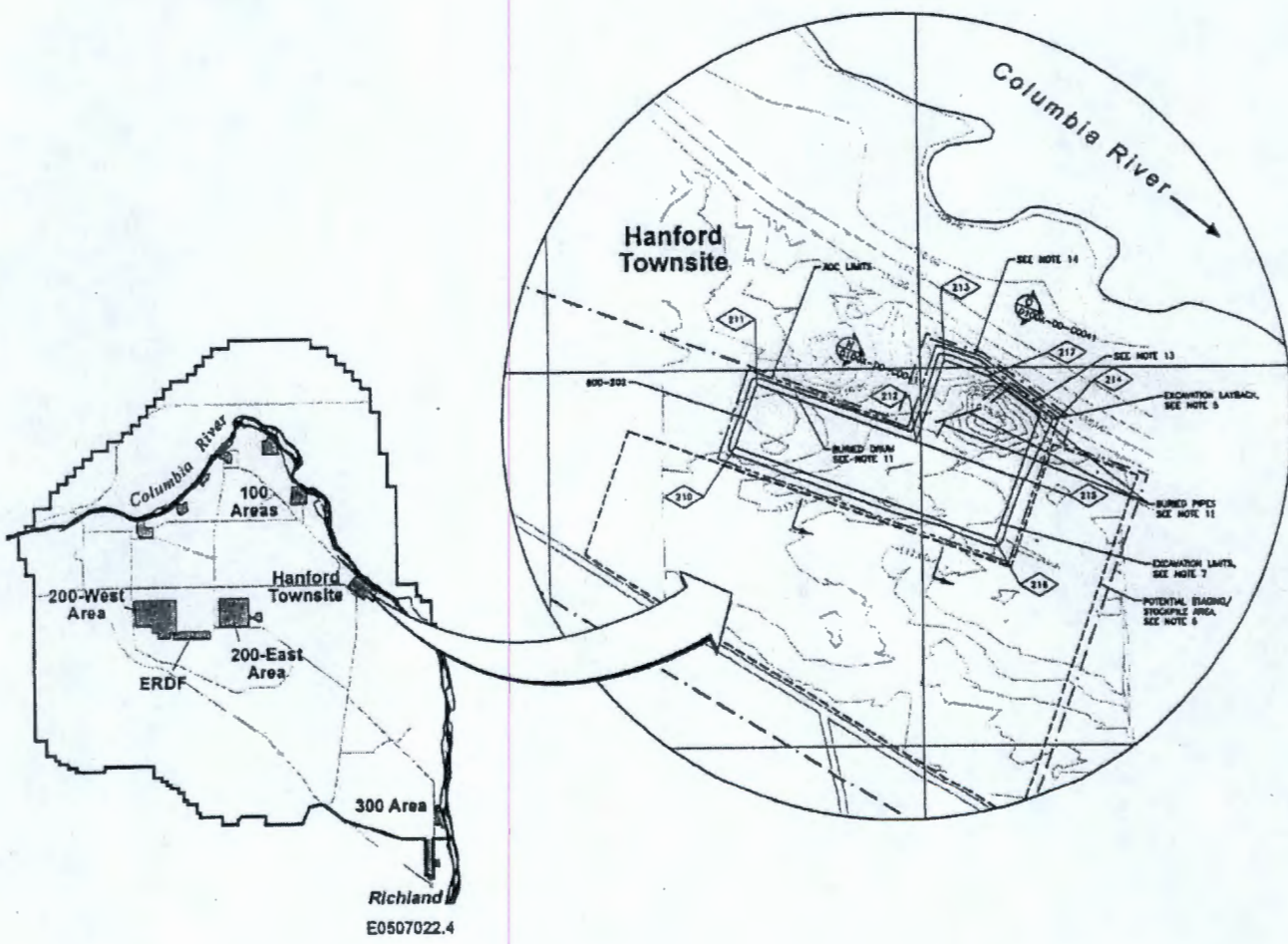
Steelhead trout and spring run Chinook salmon are now listed as endangered species under the Endangered Species Act (ESA) in the Hanford Reach of the Columbia River. Because of the close proximity of this project area to the Columbia River, extreme caution must be taken to prevent impacts to the shoreline below the ordinary high water mark (OHWM). Physical barriers such as straw bales combined with a silt fence (or equivalent barrier) must be installed above the OHWM to prevent silt or debris from reaching the river. Installation of such barriers will prevent impacts to shoreline or near shore habitats. Natural resources staff has initiated consultation with the Washington Department of Fish and Wildlife, a follow up notification letter will be sent explaining the contingency planning should remedial actions breach the upper terrace of the Columbia River.

No species or habitats of concern are present in the upland area and no impacts to ecological resources at or surrounding the site are anticipated if the prescribed mitigation actions are implemented. Since all remediation activities planned for this site will take place within the upland area, and the project will not excavate below the OHWM, this project will not adversely affect steelhead trout or spring run Chinook salmon or their habitats.

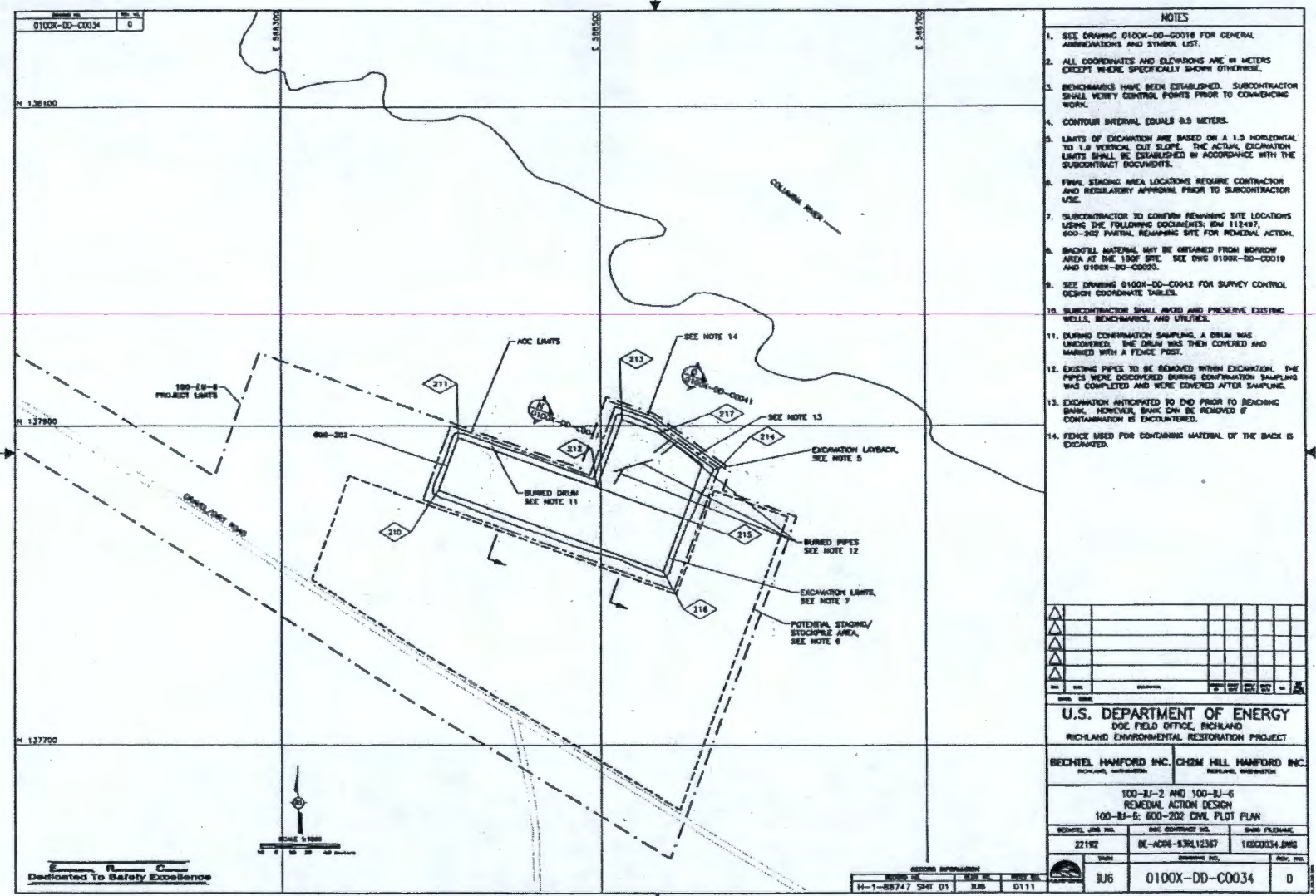
If the scope of this project changes and remedial actions will extend below the OHWM, natural resources staff must be contacted to begin Endangered Species Act consultation with the National Marine Fisheries Service (NOAA Fisheries), or if this project is scheduled to start March through July please contact Ken Gano at 372-9316 or April Johnson at 372-9185 for additional direction.

ALJ:njr

Attachment(s): Map - Figure 1
Map - Figure 2



Map - Figure 1



- NOTES**
1. SEE DRAWING 0100X-DD-C0034 FOR GENERAL ABREVIATIONS AND SYMBOL LIST.
 2. ALL COORDINATES AND ELEVATIONS ARE IN METERS EXCEPT WHERE SPECIFICALLY SHOWN OTHERWISE.
 3. BENCHMARKS HAVE BEEN ESTABLISHED. SUBCONTRACTOR SHALL VERIFY CONTROL POINTS PRIOR TO COMMENCING WORK.
 4. CONTOUR INTERVAL EQUALS 0.5 METERS.
 5. LIMITS OF EXCAVATION ARE BASED ON A 1:5 HORIZONTAL TO 1.0 VERTICAL CUT SLOPE. THE ACTUAL EXCAVATION LIMITS SHALL BE ESTABLISHED IN ACCORDANCE WITH THE SUBCONTRACT DOCUMENTS.
 6. FINAL STAGING AREA LOCATIONS REQUIRE CONTRACTOR AND REGULATORY APPROVAL PRIOR TO SUBCONTRACTOR USE.
 7. SUBCONTRACTOR TO CONTAIN REMAINING SITE LOCATIONS USING THE FOLLOWING DOCUMENTS: IOM 112497, 600-202 PARTIAL, REMAINING SITE FOR REMEDIAL ACTION.
 8. BACKFILL MATERIAL MAY BE OBTAINED FROM BORROW AREA AT THE 150F SITE. SEE DWG 0100X-DD-C0019 AND 0100X-DD-C0020.
 9. SEE DRAWING 0100X-DD-C0042 FOR SURVEY CONTROL DESIGN COORDINATE TABLES.
 10. SUBCONTRACTOR SHALL PROTECT AND PRESERVE EXISTING WELLS, BENCHMARKS, AND UTILITIES.
 11. DURING CONFIRMATION SAMPLING, A DRUM WAS UNCOVERED. THE DRUM WAS THEN COVERED AND MARKED WITH A FENCE POST.
 12. EXISTING PIPES TO BE REMOVED WITH EXCAVATION. THE PIPES WERE DISCOVERED DURING CONFIRMATION SAMPLING WAS COMPLETED AND WERE COVERED AFTER SAMPLING.
 13. EXCAVATION ANTICIPATED TO END PRIOR TO REACHING BANK. HOWEVER, BANK CAN BE REMOVED IF CONTAMINATION IS ENCOUNTERED.
 14. FENCE USED FOR CONTAINING MATERIAL OF THE BACK IS EXCAVATED.

U.S. DEPARTMENT OF ENERGY
DOE FIELD OFFICE, RICHLAND
RICHLAND ENVIRONMENTAL RESTORATION PROJECT

BECHTEL HANFORD INC. CHEM HILL HANFORD INC.
RICHLAND, WASHINGTON RICHLAND, WASHINGTON

100-BJ-2 AND 100-BJ-6
REMEDIAL ACTION DESIGN
100-BJ-6; 600-202 CIVIL PLOT PLAN

BECHTEL JOB NO.	BECHTEL CONTRACT NO.	DOE FILENAME
22182	DE-HCW-13RL12367	100C0034.JMG

DATE	DRAWING NO.	REV. NO.
BJ6	0100X-DD-C0034	0

REVISION INFORMATION
REV. NO. DATE BY
H-1-88747 SHT 01 BJ6 0111

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Dedicated To Safety Excellence

Map - Figure 2