



Oregon

Theodore R. Kulongoski, Governor

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December 12, 2006

Mr. David Biancosino
U.S. Department of Energy
Pacific Northwest Site Office
P.O. Box 350, MS K9-42
Richland, WA 99352

RECEIVED
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EDMC

Re: Draft Environmental Assessment for the PNNL Physical Sciences Facility

Dear Mr. Biancosino:

Oregon appreciates the opportunity to review the draft Environmental Assessment (EA) for the planned Physical Sciences Facility (PSF) at Pacific Northwest National Laboratory. The EA is intended to identify and assess adverse effects of alternative approaches for providing facilities for PNNL, specifically the PSF, and to identify a preferred alternative. Based on review of the document, we have a number of questions and concerns regarding the process and the resulting assessment.

1. Section 4.7 of the EA states that DOE is "working with EPA and the Washington State Department of Ecology to remove the portion of the PNNL site located north of Horn Rapids Road from the National Priorities List (NPL)." This statement needs to be made more clear regarding what land is at issue – the existing "PNNL site," the "buffer area," or both. We also have a more fundamental concern with the proposed deletion from the NPL, specifically concerning the timing. Recent communication to Oregon from the U.S. Environmental Protection Agency (e-mail from Larry Gadbois, August 21, 2006) states in part that "EPA has been very clear with DOE that NPL deletion is too far into the future for DOE to spend its time strategizing on how it will do this." Section 4.7 notes that the site does not appear to require any cleanup associated with existing records of decision (RODs) for the 300-FF-2 or 300-FF-5 operating units. While this is true, it bears noting that the cited documents are interim action RODs that did not consider the full suite of contaminants in the 300 Area. Cleanup action could be required (though probably unlikely) under final RODs that will be prepared in the future. It is also important to note that groundwater underlying the PNNL site and most of the buffer area is contaminated with nitrate at concentrations above drinking water standards, and that the area lies down-gradient of an evolving uranium plume northeast of the Horn Rapids Landfill.
2. Perhaps the most critical shortcoming of the EA is its failure to consider continued use of existing buildings in the 300 Area. The "no action alternative" described in Sections 3.3 and

Reservation (CTUIR) have identified a number of concerns regarding transfer and development of the PNNL and buffer sites related to cultural resources and management of the lands. Those concerns do not appear to be adequately addressed in the draft EA.

We look forward to working with RL and the PNSO to resolve these questions and concerns in a revised EA for the PNNL site. Should you have any questions or wish to discuss any of our comments, please call me (503-378-4906) or Paul Shaffer (503-378-4456) of my staff.

Sincerely,



Ken Niles
Assistant Director

cc: Nick Ceto, U.S. Environmental Protection Agency
Jane Hedges, Washington Department of Ecology
Joe Franco, U.S. Department of Energy
Todd Martin, Hanford Advisory Board
Stuart Harris, Confederated Tribes of the Umatilla Indian Reservation
Barbara Harper, Confederated Tribes of the Umatilla Indian Reservation
Russell Jim, Yakama Indian Nation
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