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State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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

March 3, 2000

Mr. Charles Clarke
U.S. Environmental Protection Agency
1200 6th Ave.
Seattle, WA 98101

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EDMC

Dear Mr. Clarke:

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

The Washington Department of Fish and Wildlife recognizes that efforts are well under way to clean up hazardous substances released during the production of fissile materials at the Hanford Site. The U.S. Environmental Protection Agency (EPA) is charged with carrying out the provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and is a party to the Hanford Federal Facility Agreement and Consent Order. The provisions of CERCLA are implemented through the National Contingency Plan (NCP) which establishes the process that EPA uses to determine long-term evaluation and response.

An important component of the CERCLA Remedial Investigation/ Feasibility Study (RI/FS) process is characterization of the nature and extent of contaminants at each National Priority List (NPL) site. WDFW, as trustee of the state's fish and wildlife, has determined the need to integrate the collection of biological data into the characterization process to ensure that response actions are protective of the environment. Coordination of ecological exposure/assessments during this process would allow all parties to more quickly restore natural resources at the lowest total cost to the public. We believe that a Biological Technical Assistant Group (BTAG) would assist in determining contaminants, sensitive receptors, and routes of exposure to determine which of these are worthy of further investigation during the characterization process.

Given that cleanup activities are under way, we see an urgent need to establish a BTAG at the Hanford Site. This urgency arises from the fact that important cleanup actions and reviews are scheduled to occur in year 2000 and that there is a limited window of opportunity to provide meaningful advice to the decision-makers. Actions pending include 5-year reviews of interim Record of Decisions (ROD) and remaining RI/FS

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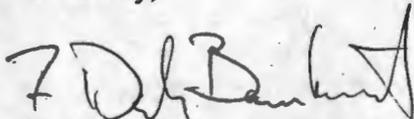
documents that are being developed for Operable Units in the 100, 200 and 300 Area NPL sites.

Since issuance of the first interim ground water RODs, three salmonids (Upper Columbia River steelhead, *Oncorhynchus mykiss*, upper Columbia River spring chinook, *O. tshawytscha*, and bull trout, *Salvelinus confluentus*) have been listed under the Endangered Species Act (ESA). The National Marine Fisheries Service has issued a final rule identifying critical habitat, which includes the Hanford Reach, for upper Columbia River steelhead and spring chinook. A BTAG could provide valuable input on environmental evaluations to assess threats to the environment, especially critical habitats of these federally listed salmonids.

BTAGs have been utilized successfully at other federal facilities across the country, such as, Rocky Mountain Arsenal in Colorado, Monticello Mill Tailings in Utah, and Brookhaven National Laboratory in New York. They have contributed significantly to the remedial decision-making process. We believe that the establishment of a BTAG at the Hanford Site, the largest facility in the U.S. Department of Energy (USDOE) complex, would benefit the regulatory agencies, the USDOE, the trustees and the public.

Given the benefits identified here and in our previous letter dated December 21, 1999 to Mr. Doug Sherwood, Hanford Project Manager, (see enclosure) we request that a BTAG be established for the Hanford Site. We would be happy to discuss this proposal with you in more detail. We also believe that the other tribal, federal and state trustees should be in attendance. Please contact either Ted Clausing at (509) 457-9314 or Jay McConnaughey at (509) 736-3095 of my staff to coordinate a meeting.

Sincerely,



Dale Bambrick
Regional Director

DFB:JLM

Enclosure

cc w/out encl:

Hanford Natural Resource Trustee Council
Susan Hughs, Chair