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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

January 10, 1995

Mr. K. Mike Thompson
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Re: Comments on the "Preliminary Determination of Chromium Concentration Within Pore Water, Periphyton, and Chinook Salmon Eggs at Hanford Reach Spawning Area in Proximity to 100-HR-3 Operable Unit," BHI-00156, Rev. 0A, November 1994

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Dear Mr. Thompson:

The Washington State Department of Ecology (Ecology) submits the following comments regarding the above referenced document. Due to time constraints, a rigorous analysis of the report was not performed. Therefore, the comments are general in nature.

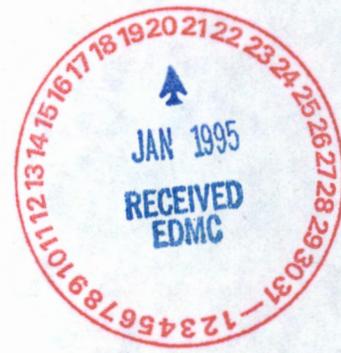
If you have any questions or concerns, please contact me at (509) 736-3049.

Sincerely,

Wayne W. Soper
Hydrogeologist
Nuclear Waste Program

WS:skr
Enclosure

cc: Randy Brich, USDOE
Lawrence Gadbois, EPA
Administrative Records: 100 Area Generic



General Comments

Comment: Ecology's position is the sampling effort has merit. It should be kept in mind, as the document title suggests, this work is a preliminary determination of chromium concentrations. Our concern is the data gathered will be defensible, i.e., there will be adequate QA/QC.

Comment: The document suggests near river wells will be sampled at the same time (page 2, section 1.2, and page 4, fifth paragraph), but there is no discussion about this matter. Which wells are going to be sampled, and when? Please provide more information on this, including sampling procedures.

Comment: Exactly which locations in the river are to be sampled? Ecology would like to see a more detailed sample location plan before field work occurs. Furthermore, Ecology requests the opportunity to be present during sampling.

Comment: Ecology would like to take some split samples. Since the holding time for chromium VI is 24 hours maximum, we strongly recommend conducting sampling during the first part of the week.

Comment: Ecology recommends taking conductivity readings at each sample location in order to help determine if we are sampling groundwater, and not river water. More discussion is necessary on this subject, since conductivity values alone can be misleading or even false. What other methods will be used to determine if we are, in fact, sampling groundwater?