

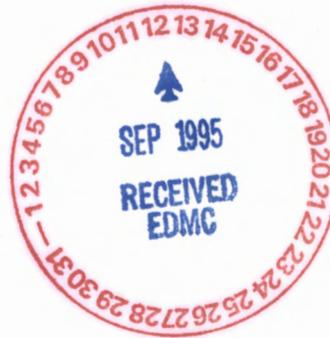


STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

August 30, 1995

Mr. Bryan Foley  
Department of Energy-Richland Operations  
P. O. Box 550  
Richland, WA 99352



Dear Mr. Foley:

Re: Review of the *Limited Field Investigation for the 200-UP-2 Operable Unit*, DOE/RL-95-13, Draft A 41620

The Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) have completed their review of the *Limited Field Investigation for the 200-UP-2 Operable Unit* (LFI). Overall, the LFI draft is an exceptional document, however, the following comments on the Ecological Risk Assessment portion should be resolved before finalization.

**General Comments**

Given the receptor for the ecological risk assessment is the Great Basin Pocket Mouse (a burrowing animal), the risk assessment must consider a direct contaminant uptake pathway from soil to pocket mouse (e.g., inhalation during digging and ingestion during grooming). Exposure to contaminated dust is a factor. A conservative approach to ecological risk is not being taken if this previously mentioned pathway is excluded from evaluation.

**Specific Comments**

**Page 4-9, section 4.3.1.1.1, first paragraph, last sentence:** Please provide studies which could support the assumption made in this sentence. A conservative approach is not being taken for the ecological risk evaluation if a direct pathway of soil to pocket mouse is not included for inhalation and ingestion of contaminants. This pathway must be included in the ecological risk assessment.

**Page 4-10, section 4.3.1.1.2, last paragraph, first sentence:** Request a statement within the parenthesis read "e.g., internal dose rate from consumption of food and ingestion of contaminated dust during grooming, and inhalation of contaminated dust during digging."

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START

**Page 4-11, section 4.3.1.1.3, second to last sentence:** Please cite any studies which support the 1 rad/day aquatic limits applicability to a terrestrial scenario.

**Page 4-11, section 4.3.1.2.2, first paragraph, second sentence:** Request that analysis include ingestion of soil from grooming and inhalation of contaminated dust from digging.

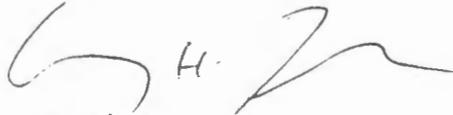
**Page 4-12, section 4.3.1.2.3, third paragraph, first sentence:** See comment on section 4.3.1.1.3

**Page 4-12, section 4.3.1.2.5, second sentence:** The screening should also include the direct pathway of soil to pocket mouse (e.g., ingestion of contaminants from grooming and inhalation during digging).

**Page 4-13, section 4.3.2, first paragraph:** Please clarify where the EHQ limits came from to rank relative risk. Who established these values?

If you have any questions, feel free to call me at (509)736-3026, or Jay McConnaughey at (509)736-3095.

Sincerely,



Gary H. Freedman  
Nuclear Waste Program

GF:mf

cc: Beth Ward, USDOE  
David Einan, EPA  
Administrative Record (200-UP-2)