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March 31, 2004

Roy Bauer  
U.S. Department of Energy – R/L  
P.O. Box 550, MSIN: E6-35  
Richland WA 99352

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Dear Mr. Bauer:

RE: Review, Initial Draft DQO Workbook for Hanford Ecological Data Quality Objectives for the Terrestrial Environment of the Central Plateau, March 23, 2004

General Comment

This review is cursory and constrained by time.

We are pleased this draft has successfully captured most of the comments provided during the January 29 workshop. It is a good step forward in making progress for the Central Plateau Ecological Risk Assessment. Numerous policy issues raised in the Participant Interview Issues Matrix do not appear to be in this workbook, we assume primarily because the focus is on problem formulation (Step 3), and to lesser extent, study design (Step 4). However, many issues, e.g., pre-contamination ecological sampling, data needs to help assess potential natural resource damages, and ground-truthing could have been included but are not. It is important the final sampling design and risk characterization reflect all the applicable issues identified in the matrix.

Specific Comments

Page 3, third paragraph, first sentence:

The text characterizes the first "EcoDQO" workshop as a "public meeting." This term has a specific meaning in the context of Hanford, the TPA and the Public Involvement Plan. While attended by various agencies, we don't believe this workshop was a public meeting. Suggest the workbook refer to the January 29 meeting as a workshop.

Pages 6-8, Section 2.1:

Various depths for biological activity are given in the text, e.g., "top 6 ft.," "two meters," "an average depth of 7.5 ft." for harvester ants, and "9.8 ft." for bitterbrush. The text also states,

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numbers and offers increased sampling opportunities. Third, it makes sense to collect data on shrub-steppe obligate species since they are at higher risk. Fourth, data on the sage sparrow could provide useful information for purposes of a natural resource damage assessment.

Page 21, Table 4-5, AE6:

A representative avian species needs to be listed.

Page 23, Tables 5-1 to 5-3:

Expense is listed as justification for running or not running certain tests but this subjective criterion is inadequately explained. Please provide additional information in the text or explain at the next meeting.

Page 41, second paragraph:

Attachment 2 was not available at the time of this review. It lists the sites considered and the list of representative waste sites. It is not known therefore, what sites are excluded from the study design because they did not meet the criteria, or because information was lacking. Given the uncertainties in the amount and nature of inventory of waste disposed at Hanford there is concern sites will be missed. It is important this ecological risk assessment be fully integrated with operable unit investigations to take advantage of the most recent information. It is also important the lack of complete information be factored into the uncertainty analysis.

It is highly recommended that reference site sampling be sufficiently robust to provide adequate information to assess potential natural resource damages.

Sincerely,



Larry Goldstein  
Nuclear Waste Program

Cc: Hanford Natural Resource Trustee Council  
John Price, Ecology  
Administrative Records

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