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United States Department of the Interior

FISH AND WILDLIFE SERVICE
911 NE 11th Avenue
Portland Oregon 97232-4181

IN REPLY REFER TO
AES/HC

JUN 18 2003

Memorandum

To: Regional Environmental Officer, Office of the Secretary
Portland, Oregon

From: *Acting* Regional Director, Fish and Wildlife Service
Region 1, Portland, Oregon

Subject: Review of Revised Draft Environmental Impact Statement for Hanford Site Solid
Radioactive and Hazardous Waste Program, Richland, Washington (ER03/0373)

Attached are our comments on the subject document for your use in producing Department of the Interior comments. If you have questions, please contact Don Steffek at 503-231-6223.

Attached

RECEIVED
JAN 24 2008

EDMC

United States Department of the Interior
Office of the Secretary
Portland, Oregon

Mr. Michael S. Collins
HSW EIS Document Manager
Richland Operations Office
U.S. Department of Energy, A6-38
P.O. Box 550
Richland, Washington 99352

Dear Mr. Collins:

This letter is in response to your request for public comment regarding the revised draft Hanford Site Solid Waste Program, Environmental Impact Statement (DEIS). The Department of the Interior has reviewed the DEIS as staff resources have allowed and we have the following comments. The DEIS includes additional alternatives as compared to your earlier DEIS. However, from our perspective, the analysis of environmental effects must be expanded to take into account non-radiological contaminants, include some site specific toxicological information, and better address potential effects to biota.

In general, the Ecological Resources and Environmental Consequences sections should be revised to evaluate all anticipated contaminants associated with the various wastes. For instance, impacts to Columbia River aquatic and riparian resources were limited to key radionuclides (page I.27). All radiological and non-rad hazardous waste should be identified and evaluated for exposure, effects, and risk. The risk analysis should include evaluation of cumulative, additive, synergistic and antagonistic effects of all potential contaminants in order to ascertain appropriate clean-up levels. We also strongly suggest that site specific toxicological data for local species be included in any risk assessments, so effect levels can be customized to local conditions. We realize that many uncertainties exist for the Hanford site, but identifying what contaminants have the potential to be released and determining effect levels to biota are necessary to conduct a quality ecological risk assessment. We recommend that additional data be collected and that you coordinate with the Hanford Natural Resource Trustee Council on the evaluation of risk to ecological receptors.

We observed that habitat restoration is not directly discussed in your list of potential mitigation measures. We suggest that the DEIS identify habitat restoration as a mitigation method for when existing habitats are impacted by construction activities associated with the solid waste program or where contaminants adversely affect habitat quality.

In general, we also recommend that any in-ground disposal of waste be in lined-facilities that are designed to last as long as the waste is hazardous and/or radioactive. Operation and maintenance and monitoring plans should be clearly described. We recommend that compliance sampling and monitoring be done at the anticipated release sites for groundwater and surface water, not a

substantial distance downstream as described in the DEIS. We also suggest that cleanup and monitoring be conducted based on effect concentrations of the various contaminants, not on the general definitions provided for low-level, mixed low level, and transuranic wastes.

Section 7 of the Act requires Federal Agencies to consult with the Service if their actions may affect a federally listed threatened or endangered species. Section 9 of the Act prohibits the "take" (e.g., harm, harassment, pursue, injure, kill) of federally listed wildlife species. Take can only be permitted pursuant to the pertinent language and provisions in Section 7 and Section 10(a) or through a special rule under Section 4(d) of the Act. Informal consultation may be used to exchange information and resolve conflicts with respect to listed species prior to a written request for formal consultation.

For this project, the species list of 1973, as amended you include is accurate. However, the Federal action agency under section 7(a)(2) of the Endangered Species Act is required to determine if the project will have no effect or may affect listed species. You include a general description of endangered species in section 4.6.4 of the Affected Environment discussion, but there is no effect analysis provided. We suggest that you complete an effect analysis to be in compliance with the Endangered Species Act. If you have any questions regarding your responsibilities under section 7, please contact us and we will be glad to provide technical assistance.

We appreciate the opportunity to review and comment on the DEIS. We look forward to continuing to work with the Department of Energy on cleanup, habitat restoration and management issues at the Hanford Site. If you have any questions regarding our comments or would like to discuss in greater detail, please contact Don Steffek, Regional Chief, Environmental Contaminants Program, Fish and Wildlife Service, at (503)231-6223.

Sincerely,

Preston Slegger
Regional Environmental Officer



FACSIMILE TRANSMITTAL COVER SHEET



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Number of Pages (including cover sheet): 4

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