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STATE OF WASHINGTON
DEPARTMENT OF FISH AND WILDLIFE

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12 January, 2000

Mike Goldstein
U.S. Environmental Protection Agency
712 Swift Blvd., Suite 5
Richland, WA 99352

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EDMC

Dear Mr. Goldstein:

Subject: Comments on the *Proposed Plan for the 300-FF-2 Operable Unit* DOE/RL-99-53 Draft A, and the *Focused Feasibility Study for the 300-FF-2 Operable Unit*, DOE/RL-99-40, Draft A.

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The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to provide comments on the aforementioned documents. We also referenced the *Limited Field Investigation Report for the 300-FF-2 Operable Unit* in developing our response. We conclude that there has been insufficient characterization of the 300-FF-2 Operable Unit to make any informed remedial decisions. Specifically, insufficient biological data has been gathered that prevents us from determining what hazardous substances are biologically available and pose a risk to biological receptors. Therefore, we are unable to support any proposed remedial action without additional biological data being collected to establish an appropriate pre-remedial baseline for the 300-FF-2 Operable Unit.

The 300-FF-2 ecological risk assessment is unacceptable. Data are not sufficient to formulate a conceptual model of the sites and to perform an ecological risk assessment. In addition, the 300-FF-5 Operable Unit risk assessment is outdated and is inappropriate as an analogous analysis for the 300-FF-2 Operable Unit. Groundwater contaminants are reaching the Columbia River as stated in the Focused Feasibility Study. Therefore, these contaminants must be evaluated to assess impacts to federally listed salmonids.

The Work Plan and Focus Feasibility Study have not considered recent federal listings under the Endangered Species Act (ESA). Three salmonid species have been listed. They include upper Columbia River steelhead (*Oncorhynchus mykiss*), as endangered (8/97), upper Columbia River spring chinook salmon (*O. tshawytscha*), as endangered (3/99), and bull trout (*Salvelinus confluentus*), as threatened (6/98). The NCP (40 CFR § 300.430(e)(2)(i)(G)) states "Environmental evaluations shall be performed to assess threats to the environment, especially sensitive habitats and critical habitats of species protected under the ESA." We request that U.S. Department of Energy (USDOE) gather

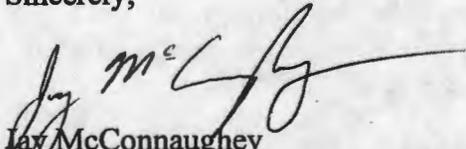
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ecological exposure/assessment information to determine any adverse effects to federally listed salmonid species and to establish clean-up levels protective of these species.

WDFW asks that the Migratory Bird Treaty Act (MBTA) be added as an applicable or relevant and appropriate requirement. Pathways may be open that could possibly adversely impact individual species protected by the MBTA. This request is consistent with a memorandum issued by the U.S. Environmental Protection Agency on October 7, 1999 from the Director of Office of Emergency and Remedial Response to Superfund National Policy Managers Region 1-10, Subject: *Issuance of Final Guidance: Ecological Risk Assessment and Risk Management Principles for Superfund Sites*. The Director states that "Superfund remedial actions generally should not be designed to protect organisms on an individual basis (the exception being designated protected status resources, such as listed or candidate threatened and endangered species or treaty-protected species that could be exposed to site releases)..." We interpret that sentence to include species protected under the MBTA. WDFW asks that USDOE perform an ecological exposure/assessment to ensure the proposed remedial actions are protective of these species.

Again, thank you for the opportunity to comment. If you have any questions regarding these comments, please contact me at (509) 736-3095.

Sincerely,



Jay McConnaughey
Habitat Biologist, Hanford Site

cc:

Hanford Natural Resource Trustee Council
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✓ 300 Area Administrative Record