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STATE OF WASHINGTON
DEPARTMENT OF FISH AND WILDLIFE

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Kennewick, WA 99336

4 August, 1999

Bryan Foley
U.S. Department of Energy
P.O. Box 550, MSIN: HO-12
Richland, WA 99352



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AUG 05 1999
DOE-RL / DIS

Dear Mr. Foley:

Subject: Comments on the *200-CW-1 Operable Unit RI/FS Work Plan and 216-B-3 RCRA TSD Unit Sampling Plan* (Work Plan), DOE/RL-99-07 Draft B.

51044

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to comment on the Work Plan. It is our understanding that the Work Plan provides the details and approach for characterizing chemical, radiological, and physical conditions at the waste sites in the 200-CW-1 Operable Unit.

As part of the site characterization, the regulators and U.S. Department of Energy (USDOE) should recognize the benefits of sampling biological receptors to define the nature and extent of radiological and chemical contamination; establish pre-remedial conditions; and assist in the evaluation, selection and design of a remedial alternative. By establishing pre-remedial exposure levels, USDOE will be in a much better position to determine whether the selected remedy has actually reduced or eliminated exposure levels to biological receptors.

Part of the field investigation activities and sampling analysis plan should include an on-site biological assessment. This would accomplish the following 3 objectives: 1) establish/confirm source receptor contaminant pathways, 2) identify areas of concern for biological receptors, and 3) assist in establishing cleanup criteria that are protective of the environment and federal trust resources.

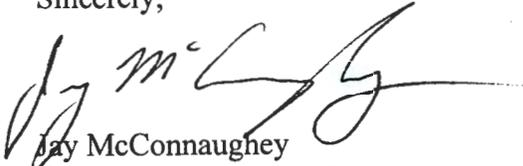
Biological data are needed as part of the characterization effort to assist in the selection and design of a remedial alternative that is protective of the environment. We encourage the collection, at a minimum, include ground beetles, small mammals (deer/pocket mice), and plant species found at the waste sites, and for the aquatic sites (Gable Mountain Pond) encourage collection of amphibians too.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Jay McConnaughey". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jay McConnaughey
Habitat Biologist, Hanford Site

cc:

L. Cusack, Ecology
R. Skinnarland, Ecology
T. Clausing, WDFW