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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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May 11, 1993

Mr. James D. Bauer  
Program Manager  
U.S. Department of Energy  
P.O. Box 550  
Richland, Wa 99352-0550



Dear Mr. Bauer:

Re: Columbia River Comprehensive Study

Thank you for your April 7, 1993, letter regarding a comprehensive study for the Columbia River. Ecology supports this proposal and looks forward to meeting with your staff at the earliest possible date to define the scope and timing of this study.

Your letter describes an ecosystem approach for Columbia River assessments, as referenced in the September 1991, Tri-Party Agreement change package. We assume this reference is to Milestones M-30-01 and M-30-02, "Submit a report to EPA and Ecology evaluating the impact to the Columbia River from contaminated springs and seeps" and, "Submit a plan to Ecology and EPA to determine cumulative health and environmental impacts to the Columbia River." These milestones were required by Ecology and EPA in recognition that additional baseline data for the Columbia River need to be defined, collected, and analyzed to enable human and environmental health risk assessments. Such assessments are a fundamental requirement of CERCLA §104 (b), § 120(e) and 40 CFR 300.430, as reflected in the Tri-Party Agreement.

Ecology agrees that the intent of these milestones was not achieved by submittal of the subject documents, and that a comprehensive study is required. However, we have consistently informed USDOE that general studies should not delay or impede remedial actions that can be taken within the purview of operable unit investigations. For example, ground water operable units are defined as "that area containing all groundwater, surface-water, shoreline, sediment and aquatic biota contamination..." (DOE/RL 88-36). The 100-HR-3 Operable Unit, for example, includes, "outfall structures and effluent pipelines which extend into the Columbia River" (ibid, WP 2-2).



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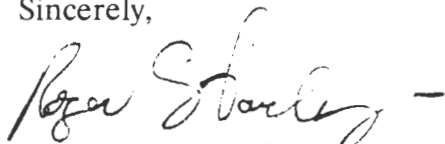
Regarding the USDOE-RL understanding that agreed upon FY 1993 and 1994 work will have to be rebaselined to accomplish this study, we don't believe this action is presently required. We recommend that an evaluation of existing, and substantial Environmental Restoration Program underspending occur soon to assess available funding sources.

The information provided to date under M-30-00 should be the basis for defining additional data needs to assess regional impacts from Hanford Site operations. Definition of the scope and nature of a new study should be based on work already accomplished. Therefore we assume the proposal to establish a milestone "to deliver the published information on the Columbia River environment" will present new data and analyses.

Regarding the RL request for Ecology and EPA to provide assumptions on Characterizing Columbia River sediments, we informally transmitted in early February specific examples of how sediments could be addressed in the "100 Focused Feasibility Study Phases 1 and 2" (DOE/RL 92-11). We met with USDOE-RL and draft meeting minutes from USDOE on March 19, 1993, and provided clarification and additional comments on the assumptions in a March 31, 1993, Ecology/EPA "DSI" sent to Mr. Eric Goller of USDOE-RL (see enclosed). USDOE-RL has not yet responded to this transmittal.

Please contact Mr. Larry Goldstein at your earliest convenience to discuss the agenda and time for the seminar. Mr. Goldstein can be reached at (206) 438-7018.

Sincerely,



Roger Stanley, Director  
Tri-Party Agreement Implementation  
Nuclear and Mixed Waste Management Program

RS:LG:lj  
Enclosure

cc: Larry Gadbois, EPA  
Julie Erickson, USDOE  
Lee Michael, WHC