

**COMMENTS ON WORKING DRAFT 1
HANFORD 1100 AREA PREASSESSMENT SCREEN**
Christopher Burford, Esq., Policy Analyst
Confederated Tribes of the Umatilla Indian Reservation (CTUIR)

INTRODUCTION

The following are my comments on the working draft 1 Hanford 1100 Area Preassessment Screen. I work through the document section by section. I apologize that I am submitting these a week late, and I realize that this creates inconvenience for you, and may limit the degree to which you can respond to my comments. Finally, I make some fairly sweeping statements in portions of my comments. Please understand that I know we are under a deadline, and the USF&WS, in particular, has very little flexibility in its time schedule. In the interest of effective communication I have followed the rule that "You can't get what you want if you don't ask for it." I understand, nevertheless, that there may be compelling reasons why we can't follow some of my suggestions. My comments are part of a dialog; not a demand letter.

As we all too well know, the documentation and history of the 1100 Area has been rich in the accumulation of facts and poor in the reasoned discussion of their importance. Our document must be clear to relatively uninformed readers, so that they will be confident that what we are doing makes sense, and that our conclusions are well-founded. Our goal must be to speak clearly about a matter that all other governmental entities have made a confusing mess.

STRUCTURE OF THE DOCUMENT

I find the organization to be cumbersome and non-intuitive. In addition, the public will not be able to meaningfully comment on the document because they lack enough background information to understand the document's context. It seems to me that the following outline would be an improvement:

I. Introduction

- A. Explanation of the CERCLA Natural Resource Restoration Process
 - a. Purpose of Process
 - b. Basic Procedural components of process
 - c. relationship to CERCLA remediation process
 - d. role of natural resource trustees
- B. Description of the Hanford Natural Resource Trustee Council
- C. History of 1100 Area
 - a. Operations
 - b. Remediation

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outline. Nevertheless, something like this, incorporating this type of analysis, preceded by the kind of information contained in the current draft's sections III.A.2 and III.B, and making reference to the five questions, is the format that I believe would work best.

1100 - EM - 1 Operable Unit Waste Sites

1100-1 Battery Acid Pit

This very small (1.8 m X 1.8 m) pit was located between a railroad track and a parking lot. It is now almost entirely covered by parking lot. Baseline condition for this site -- the condition the natural resources would have been in had the release not occurred -- is a parking lot, devoid of natural resources. According to the existing record, the only natural resources injured by these releases were geologic. The sand lining of the pit was periodically removed. This sand, however was replaced, so this site is just as capable of supporting a parking lot as it was before the releases. As far as this particular waste site is concerned, there have been no natural resource injuries, or they have been fully mitigated by the remedial action.

A remaining question is what happened to the contaminated sand. No one knows. It could be anywhere (Horn rapids landfill?). There may be a mystery dump site somewhere contaminated with this material. We do not know its location, however. Moreover, I imagine we will be unlikely to find that location at a regulatorily-defined reasonable cost. Conclusion: we cannot pursue a damage assessment for this site.

1100-2 Paint and Solvent Pit

The conclusion of the EPA and DOE was that no hazardous substance release ever occurred at this site. Releases were rumored in site oral histories. No documentation supported these allegations. Investigations at the sites apparently discovered no hazardous substances above regulatory limits (Correct me if I'm wrong on this -- I couldn't be sure because Table Two did not indicate the regulatory limits.). It was concluded that no release had occurred. Therefore no remedial action was taken. We have a right to question this if there appears to be a problem with EPA's decision making, but otherwise we have a right to rely upon their conclusions.

Moreover, baseline for this site is a former borrow pit filled with construction debris and capped. That is also the current condition of this site. This site currently sustains almost no biological resources. A small amount of russian thistle and cheatgrass was present. The ground was at least 40% bare.

By contrast, a remnant old-growth sage stand was about 100 yards to the west, across the tracks, toward 1100-3, the Antifreeze and Degreaser Pit. This area contained no young sage, and the understory was mostly cheatgrass, although yarrow was present. Moreover, the area

have been in had the release not occurred. That condition is simply that of a disturbed site that has been experiencing recolonization for a longer period of time -- essentially a more mature disturbed site. Also the rail expansion, being unrelated to the release, is apparently part of the baseline.

While geologic material (soil) was injured by the release, apparently any associated damages have been mitigated by the remedial action, which apparently acquired equivalent geologic resources and placed them on the site. Conclusion: The only injury has been that the site now is covered by less mature disturbed-site vegetation than it would have covered it otherwise. This is hardly a significant enough injury to sustain a regulatorily-defined reasonable damage assessment.

Ephemeral Pool

The Ephemeral Pool was a man-made structure. It was a primitive stormwater discharge collection structure, located along the west side of the 1171 building parking lot between the parking lot and the rail road tracks. As designed, we can assume it supported virtually no biological resources, except, perhaps, for some Russian thistle. As a result, baseline is a non-vegetated man made structure. No plant or terrestrial animal resources would have been injured by the releases, although subsurface soil resource was contaminated. Nevertheless, the remediation of this site required the removal of 185 cubic meters of subsoil, which was replaced with clean fill. Conclusion: as with the Discolored Soil Site we might consider that remediation had mitigated whatever natural resource damage we might have been able to claim.

1100 - EM - 2 Operable Unit Waste Sites

Tar Flow Site and the Stained Soil Site

The 1100 EM - 2 Operable Unit is located on top of an old stabilized dune that has been significantly altered by earth moving activity, including the dumping of small cobbles on top of the dune sands. The dune apparently has a very different shape today than it had originally. Perhaps half of the material is foreign. It is apparently the largest landform for several miles in any direction.

Ironically, this highly modified dune contains better natural resources than any of the waste sites we visited. Remarkably, some native grass is still present (Indian ricegrass appears in several spots). Rabbitbrush of all sizes is very common, some of it quite large and relatively dense. Small rodent and beetle holes are common, as were tracks of medium-sized mammals. A well-used wildlife pathway crosses the site. A variety of scat was present, around the site, including large amounts of rabbit scat. No *artemisia tridentata* appear anywhere on this site.

The suspect tanks were removed from the 1262 Solvent Tank site, but no contaminants were found in the tanks or at the site. EPA concluded that no release occurred. Conclusion: we are justified in relying upon EPA's conclusion without further discussion.

COMMENTS ON THE TEXT OF WORKING DRAFT 1

My comments on Section I. INTRODUCTION

The listing of the five questions is good. You should go ahead and tell the reader what your answer is to each of these questions, and indicate which pages of the text address each question.

It seems to me that this section is desperately lacking in information. I would recommend adding at least some of the sections I outlined above. I also think that the material in the current sections II and IV should appear in the introduction.

My comments on Section II. SCOPE OF 1100 AREA PREASSESSMENT SCREEN

This section is really just part of the introduction. I recommend that it not receive a separate heading, except perhaps as a subunit of the Introduction discussion.

My comments on Section III. SITE HISTORY AND RELEVANT OPERATION

At least by the beginning of this section, and possibly within the introduction, the PAS should contain several maps. I recommend a Hanford Site map, the satellite photo, and a map showing 1100-EM 1, 2, and 3 and their waste sites.

Part A.1 belongs in the introduction section.

I am not sure why the material in Part A.2 is separate from the information provided in Part B. When touring OUs this week, I found I had to keep flipping back and forth between these parts, and the information in Part B was more directly useful. Perhaps a boiled down version of the Part A.2 information should appear in the introduction, and the rest of the Part A.2 discussion should be integrated with the Part B discussion. This makes sense, since both parts address the questions of what releases occurred and what was done about them.

Part B. of this section (pages 18-52) is very valuable. Simply to have a concise but thorough review of what was and was not done at each operable unit is a great benefit. When I toured the 1100-EM-1, 2, and 3 OUs this week, I found the information provided on pages 19 - 31 to be extremely valuable. Good job.