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HANFORD PROJECT OFFICE

MAY 11 1999

ENVIRONMENTAL PROTECTION  
AGENCY

*Nez Perce*

ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT

P.O. BOX 365 • LAPWAI, IDAHO 83540-0365 • (208) 843-7375 / FAX: 843-7378

May 10, 1999

Mr. Larry Gadbois  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, WA 99352



Re: **Proposed Plan for the K Basins Interim Remedial Action**

Dear Mr. Gadbois:

The Nez Perce Tribe's Environmental Restoration and Waste Management Program (ERWM) has reviewed documents pertaining to the proposed plan for the K Basins Interim Remedial Action.

Since 1855, reserved treaty rights of the Nez Perce Tribe in the Mid-Columbia have been recognized and affirmed through a series of Federal and State actions. These actions protect Nez Perce rights to utilize their usual and accustomed resources and resource areas in the Hanford Reach of the Columbia River and elsewhere. Accordingly, ERWM has support from the U.S. Department of Energy (DOE) to participate in and monitor relevant DOE activities.

The main goals of the Nez Perce Tribe Environmental Restoration and Waste Management (ERWM) Program are to protect Hanford's cultural resources (includes natural resources), protect the Columbia River, and to support restoration and mitigation of habitats that have been damaged.

Our comments regarding this proposed plan are listed below.

1. We support the decision to clean up the K Basins under CERCLA and support the continued effort to remove the spent nuclear fuel, sludge, water and debris. This cleanup effort that will eliminate radioactive and hazardous contaminants from reaching the Columbia River is supported by the ERWM.
2. They "hybrid system" proposed as the preferred alternative appears to be a logical and cost effective approach. We encourage approaches that do not call for significant

infrastructure construction and for approaches that will minimize the amount of waste going to the ERDF. As you are aware, any time that ERDF cells need to be added this impacts undisturbed sage/steppe habitat.

3. We assume that any major work activities at the K Basins will be done in a manner that protects cultural resources and that for any support activities that all ecological and cultural surveys be done beforehand.

4. Does this alternative need to address contaminants that have leaked from the K Basins into the ground or is this an action that will be addressed in a decontamination plan?

5. We suggest spelling out spent nuclear fuel instead of using acronyms. For non Hanford personnel, these acronyms become very confusing.

6. Section C1.0 presents a risk based approach for human health based on PCBs. Has there been any consideration to ecological health? Recently on the North Slope after the cleanup had been completed, ecological factors complicated the issue of whether or not those sites had actually been cleaned up.

We appreciate the opportunity to submit comments and we are willing to discuss these and other issues with EPA. If you wish to discuss Nez Perce ERWM's comments further please contact Dan Landeen at (208) 843-7375, (208) 843-7378 (fax) or danl@nezperce.org (email).

Sincerely,



Patrick Sobotta  
Interim ERWM Director

Cc: Kevin Clarke, DOE-RL, Indian Programs Manager  
Mike Wilson, Ecology, Nuclear Waste Program Manager  
Douglas Sherwood, EPA, Hanford Project Manager  
Russell Jim, YIN, ER/WM Manager  
J.R. Wilkinson, CTUIR, SSRP Manager