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STATE OF WASHINGTON
DEPARTMENT OF FISH AND WILDLIFE

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29 April, 1998

Phil Staats
Washington Department of Ecology
1315 W. 4th Ave.
Kennewick, WA 99336

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EDMC

Dear Mr. Staats:

RE: Comments on the 100-N Area Corrective Action Cleanup Documents (DOE/RL 97-22, DOE/RL-96-102, DOE/RL-97-30, DOE/RL-96-39, and DOE/RL-95-111)

Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to provide comments on the aforementioned documents. Our interests are the protection of aquatic organisms and spawning habitat of upriver bright fall chinook salmon *Oncorhynchus tshawytscha* and white sturgeon *Acipenser transmontanus*, and critical habitat of upper Columbia River steelhead *Oncorhynchus mykiss* from the hazardous substances of the 100-N Area released to the Columbia River.

The 100-N Area has multiple contaminants of concern which must be addressed by the proposed remedial actions of the 100-NR-1/100-NR-2 Operable Units. The 100-NR-2 groundwater operable unit affects the shoreline site of the 100-NR-1 operable unit. Proposed interim actions should not foreclose final remedial actions which address all contaminants of concern above maximum concentration levels.

Interim actions

100 NR-1

WDFW concurs with the interim remedial actions for the 100 NR-1 sites.

100 NR-2

WDFW concurs with the interim remedial action of the Sr-90 pump and treat while an evaluation of the effects of tritium, Sr-90, and hexavalent chromium on aquatic receptors is performed. The pump and treat establishes a hydraulic gradient preventing the other contaminants of concern from reaching the river. Furthermore, the effectiveness of the interim remedial action should be evaluated.

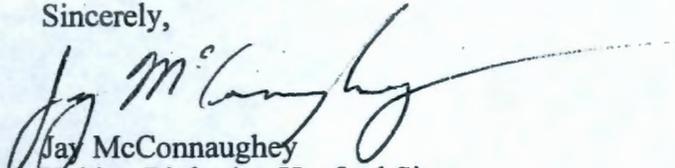
Evaluation of Sr-90 impacts to aquatic and riparian receptors

WDFW strongly agrees with the tri-party agencies that "more information must be obtained to determine whether Sr-90 concentrations are causing short- or long-term impacts to these [aquatic] receptors" and that "further evaluation of potential impacts to aquatic and riparian resources is considered a vital part of the proposed interim action". The contaminated groundwater is an exposure pathway to aquatic receptors, and aquatic receptors are currently exposed to contaminants of concern. WDFW requests studies be

Mr. Phillip Staats
29 April, 1998
page 3 of 3

Thank you for the opportunity to comment. If you have any questions regarding these comments, please feel free to contact me on (509) 736-3095.

Sincerely,



Jay McConnaughey
Habitat Biologist, Hanford Site

cc:
Hanford Natural Resource Trustee Council
Geoff Tallent, Chair
Melanie Preusser, Admin. Sec.
David Olson, USDOE
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