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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10 HANFORD PROJECT OFFICE  
712 SWIFT BOULEVARD, SUITE 5  
RICHLAND, WASHINGTON 99352

May 27, 1993



Paul Pak  
Unit Manager  
U.S. Department of Energy  
P.O. Box 550, A5-19  
Richland, Washington 99352

Subject: 200 Area Ecological Assessment Description of Work

We have reviewed the "Description of Work (DOW) for 200 Area Ecological Investigations" (WHC-SD-EN-AP-127, Rev. 0) delivered to us on May 18, 1993. Below are our comments.

The stated purpose of this DOW is to support the Interim Remedial Measure (IRM) decision path. A decision not to conduct an IRM requires a determination of minimal impact along both the human health and ecological pathways. A decision to conduct an IRM due to contamination can be determined based on either a human health or ecological impact basis. A positive indication due to either pathway is sufficient justification for an IRM. For the moderately to highly contaminated sites in the 200 area, sufficient data is available (or will be available as a result of the RI/FS abiotic sampling) to determine that IRMs are justified. The ecological data collected under this DOW is not necessary to support this IRM decision path. This DOW addresses sampling at the highest surface contaminated sites. These sites, and any analogous sites to which this data would be extrapolated, clearly warrant IRMs. This data therefore, is not necessary for the IRM process.

The ecological data that will be useful in the IRM decision process will be an itemization of ecological impacts resulting from implementation of the IRM. This DOW will not provide this information. Some of the old waste sites have been recolonized with biota of significant ecological importance, and the IRM process may jeopardize that ecological system, an impact that must be weighed in the IRM decision process. We encourage DOE to collect data that will support the assessment of side effects to implementing IRMs. This alternate information is more useful in the remedial decision process than data to calculate ecological contaminant uptake factors under high contaminant concentrations.



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A pressing ecological concern for the Environmental Restoration (ER) program is baseline information for the ER Storage and Disposal Facility (ER-SDF). The DOW's transmittal letter articulates several reasons that the ER-SDF was intentionally omitted as a study site. The first is that there is extensive information on the 200 area upon which to design this DOW for ecological sampling, but that decades of information are not available for the ER-SDF site. This supposes that the natural shrub-steppe habitat of the 200 east/west area is significantly different from the shrub-steppe habitat at the ER-SDF site. This also supposes that most of the ecological surveys on the central plateau have been restricted to the 200 area and were not sufficiently broad in scope to have included the proposed ER-SDF site. The extensive literature compiled over many years by DOE contractors lead us to believe that neither of these suppositions are founded. The decades of historical data argument supports rather than obviates the merit of an ecological contaminant sampling at the ER-SDF site. The bibliography of ecological surveys of the central plateau including the ER-SDF site is extensive. The stated lack of ecological information upon which to design a contaminant sampling program we believe is unfounded. The arguments DOE provides to postpone ecological contaminant sampling in support of the ER-SDF program we believe are unfounded.

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One additional consideration not mentioned in the DOW or the transmittal letter is incorporation of ecological injury assessment as part of the CERCLA section 107 process. We recommend that the Natural Resource Trustees be afforded the opportunity to identify their injury assessment needs and appropriate sampling and data evaluation be conducted.

The work scope specified in the DOW appears to be an extension of the site-wide monitoring program. As such, this work could proceed under the guise of that program and as such would not require regulator concurrence. We believe that it is unnecessary for us to review this DOW for the purpose of satisfying information needs for the initial CERCLA remedial investigation process. If you determine that this effort should be pursued as part of the site-wide monitoring program, we would be glad to provide you with comments in light of that purpose. If you decide you would like to pursue this effort in support of the natural resource injury assessment process, again we would be glad to review it in that light. We have already reviewed the

Paul Pak

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DOW from a generic technical perspective, and have specific comments, however it would be inappropriate to transmit them until a purpose for the DOW effort is clarified and our comments can be focused appropriately.

If you have any questions on this matter, please contact me at (509) 376-9884.

Sincerely,

*Larry Gadbois*

Larry Gadbois  
Environmental Scientist

cc: Alex Teimouri, DOE  
Steve Wisness, DOE  
Steve Cross, Ecology  
Roger Stanley, Ecology  
Darci Teel/Jeff Phillips, Ecology  
Audree DeAngeles, PRC  
Brian Drost, USGS  
Becky Austin, WHC  
Kathy Leonard, WHC  
Ron Mitchell, WHC  
Steve Weiss, WHC  
Administrative Record -- 200 Area Generic



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Author

Addressee

Correspondence No.

Larry Gadbois, EPA

Paul Pak, RL

Incoming: 9305541

subject: 200 Area Ecological Assessment Description of Work

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