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June 24, 1999

Ms. Pat Cirone
Chief, Risk Evaluation Unit
EPA-OEA-095
U.S. Environmental Protection Agency
1200 6th Avenue
Seattle, Washington 98101

Dear Ms. Cirone:

Subject: Invitation to Discuss the Feasibility of Establishing a Biological
Technical Assistance Group for the Hanford Site

The Hanford Natural Resource Trustee Council (Council) is interested in the establishment of a Biological Technical Assistance Group (BTAG) for the Hanford Nuclear Site located north of Richland, Washington. Mr. Joe Goulet of your staff, during a phone conversation with Mr. Tom O'Brien of the U.S. Fish and Wildlife Service, indicated that he would be willing to participate in a meeting with the Council to determine if a BTAG would be feasible for the Hanford Site. Mr. Goulet indicated that he could commit to a one-time meeting to allow the Council to discuss what technical assistance regarding biological resources we feel is needed and could be supplied by a BTAG that is not currently being addressed by the regulatory agencies in charge of the Hanford Site.

The Hanford Site lies within the semi-arid Pasco Basin of the Columbia Plateau and occupies an area of approximately 560 square miles. The Hanford Site was established in 1943 to produce plutonium for nuclear weapons developed and tested from World War II through the Cold War. The mission of the Hanford Site, managed by the U.S. Department of Energy (DOE) is no longer plutonium production and waste management, but has changed to emphasize cleanup, restoration, and waste management. A key element in the Hanford Site cleanup program is the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) between the Washington State Department of Ecology, DOE, and the U.S. Environmental Protection Agency (EPA). When the Tri-Party Agreement was originally drafted in 1989, the Hanford Site was divided into 78 operable units. As streamlining efforts have been developed by the Environmental Restoration (ER) Project, and approved by the regulators, subsequent amendments to the Tri-Party Agreement have reduced that number to 72 operable units (62 source and 10 groundwater units). The operable units are located primarily within the operational areas discussed in the Tri-Party Agreement, which are the 100, 200, 300, and 400 Areas. They include the following:

- Over 14,000 sites containing facilities, waste areas, an unplanned release sites.
- 625,000 cubic meters (817,000 cubic yards) of solid waste containing 4.8 million curies of radioactive material.

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- Nine reactors and one major fuel processing plant (over 100,000 metric tons of uranium fuel were irradiated and processed at these locations).
- Approximately 40.2 km (25 miles) of the Columbia River, including it's shoreline and islands.
- Over 600 cribs, trenches, ponds, ditches, and drains that receive 1.7 trillion liters (450 billion gallons) of liquid waste containing radioactive (approximately 678,000 curies) and hazardous chemical materials.
- 10 groundwater operable units contaminated with radioactive and/or hazardous chemical material above drinking water standards (85 square miles).

The DOE is to achieve compliance under the remedial action provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Resource Conservation and Recovery Act (RCRA).

The Council is comprised of representatives of the DOE, Department of the Interior (DOI), Nez Perce Tribe, State of Oregon, Confederated Tribes of the Umatilla Indian Reservation, State of Washington, and the Confederated Tribes and Bands of the Yakama Indian Nation. Other natural resource trustees include the U.S. Department of Commerce, National Marine Fisheries Service, and the Corp of Engineers. The primary purpose of the Council is to facilitate the coordination and cooperation of the member trustees in their efforts at restoring and minimizing adverse impacts to natural resources injured as a result of, or during cleanup of releases associated with the Site. Since establishment of the Council in 1993, there have been a variety of issues that have involved the Council. Some areas of the Hanford Site have been "delisted," a process that removes them from the National Priorities List by declaring clean-up complete. For the 100 Area and the 1100 Area which were delisted, the Council has been using the DOI, Natural Resource Damage Assessment (NRDA) process to determine if releases of hazardous materials have occurred which will continue to cause natural resource injury even though the sites have been cleaned up. As a portion of the NRDA assessment of the 100 Area, a study has been initiated by DOE in coordination with the Council to investigate chromium releases from reactor sites into the Columbia River and the effects of these releases upon threatened and endangered salmon runs. There are numerous other projects of concern to the Council including plans to expand the Environmental Restoration Disposal Facility related to replacing prime habitat that has been and will be destroyed. Hanford has the last expanse of large, mature sagebrush and associated species, known as shrub steppe habitat, in the region. Other projects of interest to the Council for site cleanup and restoration include the Cross Site Transfer Line, pump and treat groundwater in the 100-KR-4 and 100-HR-3 Areas.

While much progress has been made by the Trustees and the Tri-Party agencies to address natural resource concerns, major areas of information are needed to assist site managers with the collection and evaluation of information to assess ecological effects from releases of hazardous materials at the Hanford Site. The Council believes the establishment of a BTAG could address these data gaps. The Council would like to have help providing advice on remedial actions during cleanup, development of baseline biological data concerning contaminant exposure related to terrestrial and aquatic habitat and related species and developing restoration plans for sites as they are cleaned up.

Ms. Pat Cirone
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The Council recognizes that the value of a BTAG for this site as in other locations would be to insure that during the Remedial Investigation/Feasibility Study phase of individual projects, natural resources receive adequate consideration to insure that after cleanup, residual injury to natural resources is limited. This would benefit the DOE and the Trustees as it would not be necessary to seek additional remediation or restoration through a NRDA process. The Council anticipates being involved in cleanup activities at many of the 1400 sites on the Hanford Site and feel that the advisory role that a BTAG can function in to assist site managers with the collection and evaluation of information needed to assess biological and ecological effects will help to insure that CERCLA mandates with regard to protection of the environment will occur.

I hope that you will support convening a meeting with your staff and the Council to discuss these issues. We realize that in most EPA Regions the BTAG groups are normally in the Hazardous Waste Division and we would like to invite Mr. Michael Gearheard, Acting Director of the Hazardous Waste Division or members of his staff to participate at this meeting. If you support an initial meeting to discuss this issue with the Council, please have a member of your BTAG staff contact me at (509) 736-3095. Mr. Larry Gadbois, who represents the EPA at the Council meetings is available to coordinate the logistics of the meeting with your BTAG representative. It would be advantageous for the Council and EPA to hold this meeting at the next scheduled Natural Resource Trustee Council meeting, scheduled for July 8-9, 1999, in Olympia, Washington.

Sincerely,

Jay McConnaughey, Chair
Hanford Natural Resource Trustee Council

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cc: Mike Gearheard, EPA, Seattle, Washington
Doug Sherwood, EPA, Richland, Washington

HANFORD NATURAL RESOURCE TRUSTEE COUNCIL
FINDING 99-02

This finding is to approve the Hanford Natural Resource Trustee Council (Council) letter dated June 24, 1999, and to authorize the Chair's signature. The letter is addressed to the Chief, Risk Evaluation Unit, of U.S. Environmental Protection Agency (EPA). The subject line is, "Invitation to Discuss the Feasibility of Establishing a Biological Technical Assistance Group for the Hanford Site".

In summation, this finding conveys:

- Interest in meeting with EPA to discuss the possibility of establishing a Biological Technical Assistance Group for the Hanford Site.
- Provides background information on the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) activities at the Site, and information on the Council and its involvement in the CERCLA process to date.
- Identifies areas of interest for discussion.

CERTIFICATION

Finding 99-02 was adopted by consensus of the Hanford Natural Resource Trustee Council with __ abstentions and __ separate opinions (attached).

HANFORD NATURAL RESOURCE TRUSTEE COUNCIL

SIGNATURE PAGE

Finding 99-02: Approval of letter, "Invitation to Discuss the Feasibility of Establishing a Biological Technical Assistance Group for the Hanford Site."

_____ Support

_____ Object

_____ Abstain

_____ Support with separate opinion (below)

Signature: _____

Name: _____

Trustee Organization: _____

Date: _____