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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

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SEP 21 1999

Mr. Jay McConnaughey
State of Washington
Department of Fish and Wildlife
c/o State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336-6018



Dear Mr. McConnaughey:

RESPONSE TO STATE OF WASHINGTON DEPARTMENT OF FISH AND WILDLIFE
AUGUST 4, 1999, COMMENTS ON THE 200-CW-1 OPERABLE UNIT REMEDIAL
INVESTIGATION/FEASIBILITY STUDY (RI/FS) WORK PLAN AND 216-B-3 RESOURCE
CONSERVATION AND RECOVERY ACT (RCRA) TREATMENT, STORAGE, AND
DISPOSAL (TSD) UNIT SAMPLING PLAN, DOE/RL-99-07, DRAFT B

Thank you for your comments on the 200-CW-1 Operable Unit RI/FS Work Plan and 216-B-3
RCRA TSD Unit Sampling Plan, DOE/RL-99-07, Draft B. The U.S. Department of Energy
(DOE) has long recognized the importance of biological receptors in its management of waste
sites, including those in the 200 Areas, and has published numerous documents over the last
several decades describing the results of its various biota sampling programs. Much of the
information requested can be found in the following documents:

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- Historical Records of Radioactive Contamination in Biota at the 200 Areas of the Hanford Site, Johnson et al. (1994), WHC-MR-0418,
- the annual Near-Facility Environmental Monitoring Annual Report (now published by Fluor Daniel Hanford, Inc.),
- the annual Hanford Site Environmental Report published by Pacific Northwest National Laboratory, and
- many individual sampling reports, such as Ecological Sampling at Four Waste Sites in the 200 Areas, Mitchell and Weiss (1995), BHI-00032.

These studies have been valuable in identifying potential receptor pathways and areas of concern for both biological receptors and waste management operations. Many different species of plants and animals have been collected and analyzed, including insects and small and large mammals. At this time, additional studies are not deemed necessary, as the information defined by the U.S. Environmental Protection Agency (EPA) in its "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA (1988)" has already been collected.

Mr. Jay McConnaughey

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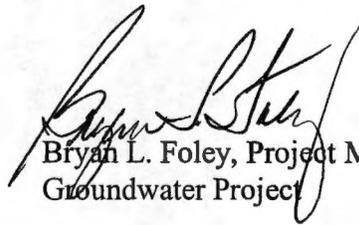
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The establishment of cleanup criteria for the 200 Areas, however, is an on-going process. At this time, and for the foreseeable future, the land use for much of the 200 Areas is expected to be industrial and waste management. Because of the disturbed nature of the waste sites, their low habitat quality, and the fact that use by biota in these areas has been discouraged, cleanup criteria do not typically focus on ecological receptors. However, remediation methods for sites in 200 Area operable units would include ecological considerations. The DOE, Richland Operations Office encourage your participation through the State of Washington Department of Ecology in helping to identify cleanup criteria for areas with the various future land uses that will protect Hanford populations of ecological receptors.

As a final clarification, it should be noted that those sites still identified as "ponds" such as Gable Mountain Pond and B Pond, have been stabilized and have not supported aquatic biota for several years.

Please do not hesitate to contact me if this response to your comments does not meet your expectations.

Sincerely,



Bryan L. Foley, Project Manager
Groundwater Project

GWP:BLF

cc: L. J. Cusack, Ecology
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