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October 11, 1999

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Dear Jean Fuller:

Thank you for the comments you provided to the Hanford Natural Resource Trustee Council (Council) on the *Hanford Site 100 Area Assessment Plan, Volume 1: Aquatic Resources* document.

Based on the comments received, we have prepared an appendix to the plan. The enclosed copy of the appendix includes a list of all the public comments that the Council received, responses from the Council, and the document revision resulting from those comments.

Again, thank you for your interest.

*Teri Elzie, for*

Susan Coburn Hughs, Chair  
Hanford Natural Resource Trustee Council

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Enclosure

## APPENDIX II – RESPONSE TO PUBLIC REVIEW COMMENTS

### June 17, 1999 Public Meeting Comments and Comment Responses

Comment #1 – Who will be reviewing the study?

Response – Members of the Council provide technical experts from their agencies to review and comment on the proposed studies as they are being developed.

Comment #2 – What type of peer review will the proposed plan go through?

Response – We are looking internally for a review from the participating Council members. In addition, to a Council review, experts in the U.S. Fish and Wildlife Service and National Biological Resource Division of the U.S. Geological Service have reviewed the Chromium study design and procedures and signed off on a Quality Assurance Project Plan.

Comment #3 – Are there heavy metals in the Columbia River above Hanford coming down from Idaho?

Response – Yes. One of the documents the Council provided to U.S. Fish and Wildlife Service to review was the *Screening Assessment and Requirements for a Comprehensive Assessment: Columbia River Comprehensive Impact Assessment*. The assessment identified several upstream non-Hanford contaminants of concern, such as copper, zinc, lead and mercury. However, Hanford does contribute to these contaminant loads.

Comment #4 – Will there be another public meeting based on the lack of attendance and public notice at this meeting?

Response – No. The comment period ran from June 7 to July 31. During that time period no additional requests to hold a public meeting were received by the Council.

### U.S. Environmental Protection Agency's (EPA) July 6, 1999 Comment Letter

Comment – The subject document states that a “number of interim cleanup decisions have been made in the 100 Area NPL site” and “more than likely, most of these interim actions will be deemed final remedies”. However, due to ongoing efforts to identify better treatment technologies and recently completed treatability studies “the existing interim cleanup decisions related to the cleanup of the groundwater in the 100 Area to protect the Columbia River are not considered final remedies” (see attached letter for more detail).

Response – The Hanford Natural Resource Trustee Council agrees with EPA's comment and has revised the second paragraph of Section 1.A accordingly.

Jean Eggers Fuller's July 20, 1999 Comment Letter

Comment – “Richland and Hanford land originally belonged to the Walla Walla and their chiefs, so they should have some say in the outcome of Hanford” (see attached letter for more detail).

Response – The Hanford Site 100 Area Assessment Plan was prepared by the U.S. Fish and Wildlife Service for the Hanford Natural Resource Trustee Council (NRTC). The NRTC is comprised of designated federal, state and tribal trustees for natural resource located within the Hanford Site. The tribal trustees include the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), which in turn includes the Walla Walla. As such, the Walla Walla do have some say in the outcome of Hanford, at least with regard to the natural resources addressed by the assessment plan and other trustee activities. The CTUIR representative on the NRTC is Mr. J.R. Wilkinson. Mr. Wilkinson can be reached at 541-278-5205.

John Strand's July 28, 1999 Comment Letter

Comment #1 – “I think that it would be better to conduct the studies in a mobile laboratory located along side the Columbia River. I see this approach is being considered for Phase II. If pathogens were or are an issue, then well water might have to be used” (see attached letter for more detail).

Response – Phase II of the study will be conducted in the Pacific Northwest National Laboratory's Hanford Site aquatics laboratory, which sits along side the Columbia River (a mobile laboratory was determined to be too risky with regard to the long term continuous operation required by the study). Phase II will involve the mixing of Hanford Site chromium contaminated groundwater with Columbia River water, the same mixing which occurs in the river gravel beds where the salmon spawn.

Comment #2 – “I don't think that using Chinook salmon from the McNenny State Fish Hatchery in Spearfish is the best approach”. “I think it would have been better to work with stock of fish inhabiting the Hanford Reach”.

Response – The fisheries biologists planning for and conducting the Phase I study recommended using the McNenny salmon eggs. The fisheries biologists reviewing the plan for the trustees agreed with this recommendation. The eggs provided by McNeeny were certified “disease free”, a certification that the biologists stated was more critical to the success of the study than using non-certified Hanford Reach salmon eggs (no Hanford Reach “disease free” eggs were available for the Phase I study). Certified “disease free” salmon eggs from the Priest Rapids hatchery will be available for the Phase II study.

Comment #3 – “There appear to be some inconsistencies in the properties of the experimental water that you will use” (i.e. varying water hardnesses) (see the attached letter for more detail).

Response – (USFWS/USGS)

Comment #4 – How did you determine that four replicates for each test concentration were enough? Is there a statistical basis for this design?

Response – (USFWS/USGS)