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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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December 4, 2000

Mr. Bryan L. Foley
U.S. Department of Energy
P.O. Box 550, MSIN: H0-12
Richland, Washington 99352

Dear Mr. Foley:

Re: 200-TW-1/2 Work Plan

53713

The U.S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology) have jointly reviewed the 200-TW-1/2 Work Plan. The following are our comments in two areas: Ecological Exposure/Effects Assessment and Integration between Environmental Restoration (ER) and Office of River Protection (ORP). Other comments have been discussed and are documented in the 200 Area Unit Manager meeting minutes.

Ecological Exposure/Effects Assessment

The TW-1/2 Work Plan does not adequately address the need for biological sampling per EPA's Ecological Risk Assessment Guidance for Superfund's *Process for Designing and Conducting Ecological Risk Assessments* (EPA 540-17-97-006). The significance of this deficiency is unclear because of the general deficiency of the U.S. Department of Energy's (USDOE's) approach to biological sampling in the 200 Area. Multiple reviewers (see below) have noted USDOE's continuing lack of focus on Ecological Exposure/Effects Assessment of the 200 Area throughout multiple work plans. USDOE's key assertion in response to those comments were:

> "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." (Letter dated 9/21/99, from Bryan L. Foley, USDOE, to Jay McConnaughey, Department of Fish and Wildlife)

Ecology and EPA assert that the information that "has already been collected" has not been documented and compiled in a manner suitable to complete either the Remedial Investigation/Feasibility Study (RI/FS) scoping, or RI reporting process described in EPA's *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA; Interim Final*, October 1988. Ecology and EPA recommend that we meet to negotiate a date for

submittal of an Ecological Assessment Remedial Investigation Report, with the expectation that this report can be completed in the current fiscal year (FY01). Please note that USDOE made the commitment to do this work in the Implementation Plan; therefore, Ecology and EPA do not view this as new work. It is our opinion that the report can be accomplished through review and compilation of the existing data that USDOE cited in its 9/21/99 letter. EPA's guidance provides the description of the report (see enclosed).

The Natural Resources Trustee Council previously noted the deficiency of USDOE's 200 Area strategy:

> Recommendations for Ecological Exposure/Effects Assessment of the 200 Area, letter dated 12/2/99, from Susan Coburn Hughs, Hanford Natural Resource Trustee Council Chair, to Keith Klein, Doug Sherwood, and Michael Wilson.

The Washington State Department of Fish and Wildlife (WDFW) noted the same deficiency in its review comments on the 200 Area Implementation Plan (letter from Jay McConnaughey, WDFW, to Bryan Foley, USDOE, Re: Comments on the document titled *200 Areas Remedial Investigation/Feasiblity Study Implementation Plan – Environmental Restoration Program*, DOE/RL-98-28, Draft B). The WDFW has separately submitted comments to USDOE on individual 200 Area operable unit work plans.

Further, USDOE's own 200 Area Implementation Plan presents information that is inconsistent with USDOE's assertion that all of the necessary information has already been collected:

Section F8.2, Page F-15, 4th paragraph	The text acknowledges the role of wildlife in spreading contamination: "Badgers . . . have been suspected of excavating contaminated soil at 200 Area radioactive waste sites (O'Farrell et al. 1973)." This acknowledgement is inconsistent with the lack of direction on biological sampling within the Implementation Plan.
Section F8.4, Page F-16, 5th (4th full) paragraph	The text acknowledges the importance of biological vectors in contaminant transport: "Wildlife and plants in the 200 Areas have a history of taking up contaminants from waste sites through burrowing and root penetration (e.g., Johnson et al. 1991, 1994)." This acknowledgement is inconsistent with the lack of direction on biological sampling within the Implementation Plan.

Integration between ER and ORP

The relevant Federal Facility Agreement and Consent Order Change Control Form (M-13-99-01, dated 10/3/99) recognizes "The efficiency gained from integrating data needs and

characterization efforts between two DOE programs" and asserts that "opportunities were identified to coordinate ER Program and ORP activities." Evidence of that coordination is noticeably deficient from the TW-1/2 Work Plan. For example, under a coordinated approach, it would be expected that the Data Quality Objectives (Section 4.1) would address the data quality objectives for the ORP tank remediation, and that the Data Uses (Section 4.2) would discuss the use of TW-1/2 data by ORP. Discussion of ORP needs and uses is noticeably absent from this work plan.

If you have any questions, please feel free to contact Doug Sherwood, EPA, at (509) 376-9529 or John Price, Ecology, at (509) 736-3029.

Sincerely,

Doug Sherwood, Project Manager
U.S. Environmental Protection Agency

John B. Price, 200 Area Unit Manager
Washington State Department of Ecology

DS:JP:sb
Enclosure

cc: Jay McConnaughey, WDFW
Bill Burke, CTUIR
Pat Sobotta, NPT
Russell Jim, YIN
Mary Lou Blazek, OOE
Administrative Record: 200-TW-1

Table 3-4. Summary of Ecological Information

Information Needed for Public Health Evaluation	Purpose or Rationale	Collection Methods: Primary	Collection Methods: Secondary
Land Use Characteristics	Determine if terrestrial environment could result in human exposure, e.g., through hunting or use of agricultural land	Ground and aerial survey maps; site survey	Ground and aerial surveys
Water Use Characteristics	Determine if aquatic environment could result in human exposure, e.g., through fishing or other recreational water activities	Water resource agency reports; site surveys	
Information Needed for Environmental Evaluation			
Ecosystem Components and Characteristics	Determine potentially affected ecosystems; determine presence of endangered species	Records of area plants and animal surveys, survey of plants and animals on or near a site; survey of a site or area photographs	Ground surveys and sample collection
Critical Habitats	Determine the area on or near a site to be protected during remediation	Records of site environment	Ground and water surveys
Biocontamination	Determine observable impact of contaminants	Records of site environment	Sampling and analysis