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Action as noted.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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September 3, 1992



Eric Goller
U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, WA 99352

Re: Columbia River Impact Evaluation Plan (M-30-02)

Dear Mr. Goller:

On July 15, 1992, the U.S. Environmental Protection Agency and the Washington Department of Ecology transmitted comments on the Draft A Columbia River Impact Evaluation Plan (DOE/RL-92-28) to the U.S. Department of Energy. On August 17 and 19, 1992, EPA and Ecology received USDOE's responses to their comments on the Plan. At the Unit Managers' Meeting on August 26, 1992, the parties decided to meet September 8 to discuss the issues.

Review of USDOE's comment responses leads me to believe that there is a difference of perception between USDOE and the two regulatory agencies on the scope of the effort envisioned under milestone M-30-02. Until the parties reach an understanding of the proper scope of the milestone, discussion of the disposition of individual comments would not be productive. The Plan, page 88, states that "a meeting will be held with EPA and Ecology in July of 1992 to define the scope of all the work tasks." As this scoping meeting has not occurred, I propose that the September 8 meeting fulfill this provision. Table 5-1 should be expanded into a full schedule of activities, including dates of completion. This meeting should be attended by a small group of representatives of the three parties who can agree on the scope of future work projecting from M-30-02. If the scope is redefined from that of the Draft A Plan, then it would be productive for USDOE to revise its comment responses to fit the new understanding. Ecology will also reassess its review of the "Proposed Data Collection Plan" chapter to ensure that data collection will support the clarified scope of M-30-02.

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Ecology interprets the scope of M-30-02 as follows:

1. The goal of the Plan is to provide for the collection of all data necessary to produce a quantitative risk assessment.

The Hanford Site Baseline Risk Assessment Methodology would provide guidance.

The "Proposed Data Collection Plan" chapter of the Plan will include a schedule of completion dates for specific tasks and activities. This schedule will include a date for completion of the risk assessment.

Contaminants of concern would be selected with in accordance with the Methodology.

Data quality objectives will be agreed to, which may include preference for empirical over modeled data.

2. The risk assessment will fully consider risks posed to human health and the environment by releases to the riparian and aquatic components of the entire Hanford Reach, including but not limited to the following:

Sediments in McNary Pool.

Releases from all the aggregate areas of the Hanford site that reach the river.

Actual current institutional uses, which includes uncontrolled access by trespassers. Additional pathways may be appropriate.

3. Points of exposure must include localized exposure at points of discharge of water through seeps/springs and the river bed.

Maximum groundwater concentrations would be used at the points of exposure, pursuant to the June 23 and 24 letters from Ecology and EPA.

Diluted concentration would not be used to evaluate risk at the points of exposure.

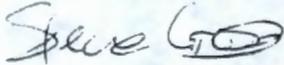
4. Ecological endpoints relevant to the aquatic and riparian habitats would be selected and analyzed. This would include endpoints relevant to evaluating the risk at the points of discharge.

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This letter does not call for a written response, as it is intended to facilitate discussion at the September 8 meeting. The results of that meeting should be documented as appropriate.

Sincerely,



Steve Cross
CERCLA Unit
Hanford Section
Nuclear and Mixed Waste Management Program

SC:jw

cc. Lynn Albin, DOH
Paul Day, EPA
Audree DeAngeles, PRC
Brian Drost, USGS
Larry Gadbois, EPA
Dave Jansen, Ecology
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Subject: COLUMBIA RIVER IMPACT EVALUATION PLAN (M-30-02)

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