

START

Oregon

August 9, 1995

DEPARTMENT OF
ENERGY



Mr. Kevin Oates
U.S. Environmental Protection Agency
712 Swift Avenue, Suite 5
Richland, WA 99352

Dear Mr. Oates:

We reviewed the Proposed Plans for Interim Remedial Measures at the 100-BC-1, 100-DR-1 and 100-HR-1 Operable Units. (DOE/RL-94-99, Rev.0; DOE\RL-94-100, Rev. 0; and DOE\RL\94-101, Rev. 1.) We agree with the approach and proposed remedies. We do however have many concerns and specific comments (attached).

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With the current mood in Congress, it is important to show early progress. We urge the Tri-Parties to move quickly to show progress in cleaning up these waste sites. We recommend the Tribes, Regulators, Natural Resource Trustees and public be continuously involved in this cleanup. If any significant changes are considered, these need to be brought back to the Tribes, Regulators, Natural Resource Trustees and public for review and input.

Performing the cleanup must be balanced with protecting the health and safety of workers and the public, and protection of natural resources. The plans and work should be designed with this in mind. The design of access into the waste sites should strive to minimize the area and volume of disturbed soil.

Sincerely,

Mary Lou Blazek
Oregon Department of Energy

John A. Kitzhaber
Governor



HANFORD PROJECT OFFICE
AUG 14 1995
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**Detailed Comments
Oregon Department of Energy**

Unless otherwise noted, these comments refer to the 100-BC-1 plan document page numbers.

1. The ecological risk (see page 7 in DOE\RL-94-99) is based on assuming the food pathway is the primary pathway of exposure to the great basin pocket mouse. The great basin pocket mouse burrows into soft soil. It also preens itself extensively. The easiest soil for the mouse to burrow into is in the disposal sites. The greatest pathway of exposure may be food, but it may also be direct ingestion of soil, direct whole body exposure, or possibly inhalation.
2. Land Use, page 7. The Hanford Future Site Uses Working Group recommendation is the only broad evaluation and recommendation on land use for the Hanford Site. The group recommended unrestricted use for the 100 Areas. Their recommendation should be the basis for land use considerations for this work.
3. Deep Excavations, page 8. There are few sites which should require deep excavation. For all excavations, we recommend the Tri-Parties attempt to the greatest degree possible to limit the surface area and volume of uncontaminated soil removed or disturbed. This can be aided by limiting the use of gradual five-to-one slopes to only those accesses needed into each site, and using steeper slopes on the remaining sides. Also, the surface disturbance should be planned to minimize the destruction of habitat, and avoid the disturbance of areas that were not disturbed by the initial construction of these units.
4. Summary of Alternatives, pages 8-10. The evaluation of which option to select must include all costs and impacts of options. This includes the impacts at the Environmental Restoration Disposal Facility (ERDF) and future impacts. The cost analysis only compares the up-front costs of the various options. The Natural Resource injuries at ERDF and in the 100 Areas are not calculated. The only options which will minimize the overall cost are the Remove-Treat-Dispose options.
5. Revegetation should be only with native plants, and should to the greatest extent possible attempt to restore the natural diversity. The Remove-Dispose alternative discusses the way revegetation plans will be developed for both the Remove-Dispose and the Remove-Treat-Dispose options. The last sentence states that input will be used from affected stakeholders such as Natural Resource Trustees

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and Native American Tribes. This should be strengthened by striking the phrase "such as" and replacing it with a comma.

6. For the 100-DR-1 Operable Unit, the importance of the chromium contamination spreading into the Columbia River and impacting Salmon spawning beds may be underestimated. The primary ecological receptor for chromium contamination in the 100 Areas is the Salmon, rather than the great basin pocket mouse. The future use of the 100 Areas is uncertain, but may include irrigation. If this occurs, the residual chromium in the waste sites may move into the groundwater and from there into the river and the salmon spawning beds.
7. During the meeting with Oregon and the public in Portland on July 27, several issues were raised about the potential for changes to the 100 Area cleanup plans. If significant new information is discovered, or changes in the law occur which cause the Tri-Parties to consider significant changes in the cleanup plans, these should trigger a re-involvement of the public in the decision making process. The Oregon Department of Energy will assist in involving Oregonians should this occur.
8. The cleanup plans do not mention how cleanup decisions will be effected when the residual waste at one site may cause an increase in groundwater contamination (such as from irrigation in the future), and thereby impact the allowable limits for cleanup at another site. The Tri-Parties should include these impacts from multiple sources in their evaluation of how extensively to excavate. Similarly, the Tri-Parties should include the impact of multiple contaminants at each site in their evaluation.
9. The Tri-Parties should assume that the 100 Areas may be irrigated in the future as they decide on how much contamination may be allowed to remain.