



Confederated Tribes and Bands
of the Yakama Nation ERWM

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Established by the
Treaty of June 9, 1855

October 9, 2015

John Price, TPA Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton
Richland, Washington 99354
Jpri461@ecy.wa.gov

Review comments on the proposed removal of the 1100 Area DOE site from the Hazardous Sites List.

Dear Mr. Price,

The Confederated Tribes and Bands of the Yakama Nation appreciate the opportunity to review and provide comments on this action. YN does not support the proposed action. Information provided in DOE/RL-2014-32 and DOE/RL-2015-52¹ supports retention of the site (i.e. Horn Rapids Landfill) on the HSL, notes the continuing responsibility for DOE oversight of institutional controls, and need for the site to continue to be included in CERCLA 5 year reviews of the Hanford facility.

YN believes Ecology has both the authority and the responsibility under the Model Toxics Control Act to require cleanup of the nitrate and uranium plumes that are contaminating the groundwater beneath the site. Statements in the referenced documents and supporting information from Ecology's website are vague (e.g., "likely," "attributed to") and indicate potential for contaminants to again exceed drinking water standards. Please note, we have previously voiced opposition to ignoring offsite plumes and selected levels for uranium.²

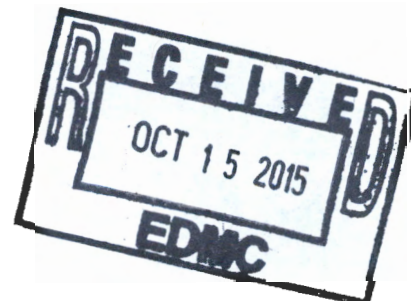
We look forward to discussing our concerns regarding current cleanup plans for Hanford with you further.

Sincerely,

Russell Jim

¹ See Attachment #1

² YN September 10, 2013 letter to Larry Gadbois, EPA and Kim Ballinger, USDOE.



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Yakama Nation ERWM Program Manager

cc:

Dennis Faulk, EPA

Ken Niles, Oregon Department of Energy

Administrative Record

Attachment: #1



Attachment #1:

1226815

DOE/RL-2014-32, Rev. 0 August 2014

Table EM.1 1100-EM at a Glance Operations included industrial and automotive activities (1954–1985), and a landfill (1950s–1970)

2013a Groundwater Monitoring

Contaminant	Drinking Water Standard	Maximum Concentration	Plume Area b (km ²)
Trichloroethene	5 µg/L	0.71 µg/L (699-S31-E10A)	0
Nitrate	45 mg/Lc	205 mg/L (699-S31-E10C)	Not calculated c
Uranium	30 µg/L	27.0 µg/L (699-S31-E10C)	Not calculated c

Remediation

Waste Sites (final action): 100% completed.

Groundwater (final action): Monitored natural attenuation.

Final record of decision: 1993.

a. December 2013 scheduled samples were collected January 2014

b. Estimated area at a concentration greater than the water quality standard.

c. 45 mg/L as NO₃ is equivalent to the drinking water standard of 10 mg/L as N. Nitrate in 1100-EM is from offsite sources.

d. Sites with status of closed, interim closed, no action, not accepted, or rejected.

DOE-RL-2014-52, Revision 0 Hanford Site Environmental Report for CY 2014

Uranium concentrations in Hanford Site wells in the vicinity of DOE's inactive Horn Rapids Landfill have increased gradually since 1996, exceeding the DWS in 2012 and dropping slightly below the standard in 2014. The presence of uranium at these locations is attributed to a plume moving northeast from an active offsite facility, AREVA NP, Inc. a nuclear fuel production facility.