

RF 3334



EG&G ROCKY FLATS, INC.
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March 24, 1993

93-RF-3334

A. H. Pauole
Acting Manager
DOE, RFO

Attn: M. E. Van Der Puy

EVALUATION OF POTENTIAL BALD EAGLE IMPACTS IN ROCKY FLATS PLANT (RFP)
ENVIRONMENTAL EVALUATIONS UNDER COMPREHENSIVE ENVIRONMENTAL
RESPONSE, COMPENSATION AND LIABILITY ACT (CERCLA), RESOURCE
CONSERVATION AND RECOVERY ACT (RCRA) AND THE INTERAGENCY AGREEMENT
(IAG) - RLB-122-93

In accordance with your instructions personnel of the Ecology and NEPA Division (END) have reviewed Data Quality Objectives (DQO's) in the RFI/RI workplans with regard to their ability to provide adequate evaluation of potential eagle impacts. They have discussed the matter at length with respective subcontractors. Following are salient comments:

Task 1. Determine Adequacy of DQO's.

END personnel believe that existing plans, when combined with information from our Biota Featured Species Database, will be adequate for an evaluation of potential impacts of contaminants on the Bald Eagles. Under separate cover we have submitted a Biological Assessment Program for RFP that contains specific recommendations for monitoring the Bald Eagle population. We have taken measures to protect the prospective nesting site from physical disturbance by RFP personnel and implemented surveys to provide pertinent data for evaluating raptor populations on RFP and within a 10-km "Expanded Study Area."

With respect to ongoing Environmental Evaluations, a preliminary screening approach to the exposure assessment for OU 3, the prospective nest site, would suggest that there are 1) extremely limited mechanisms for transport through environmental media, 2) extremely limited exposure of the relevant environmental components, and 3) extremely low potential accumulations in media or tissues. The probability of seeing accumulations of COC's in media or tissues to levels sufficient to induce effects in any raptor population is extremely remote. Furthermore, a stressor-response assessment is extremely problematic in this case. Given the highly disturbed nature of OU 3, and the many non-chemical perturbations, it would appear nearly impossible to evaluate causal evidence associated with an observed effect on Bald Eagles. At this time, of course, there is no measurable effect on Bald Eagles. They have found conditions to their liking and have chosen to establish residence on the site, one of only three such sites in the entire state.

With respect to other OU's, the scenario is somewhat different. Although Bald Eagles regularly fly over RFP, they have not been observed to nest, roost or feed. Suitable prey are extremely limited on RFP. At this time, there is insufficient justification to commit resources to studying this phenomenon, beyond the considerable resources already committed.

DIST.	INT	ENC
DETTI, R.L.	X	
JAMIN, A.		
MAN, H.S.		
NCH, D.B.		
NIVAL, G.J.		
IS, J.G.		
PERA, D.W.		
NI, B.J.		
MAN, L.K.		
LY, T.J.		
AHL, T.G.		
IG, J.G.		
ER, F.H.		
Y, W.A.		
STER, A.W.		
E.M.		
IN, H.P.	X	
X, G.E.		
ONALD, M.M.		
ENNA, F.G.		
TROSE, J.K.		
GAN, R.V.		
TER, G.L.	X	
UTO, V.M.		
Y, J.H.		
DLIN, N.B.		
PLEP, R.I.		
WART, D.L.		
LIVAN, M.T.		
INSON, F.B.		
INSON, R.B.		
JAMS, S. (ORC)		
SON, J.M.		
E, J.O.		
TLOCK, GH	X	
Sta. SM	X	
RNDI M	X	
TRY D	X	
ARRINGTON F.	X	
illaine, M.	X	
Wax MF	X	
30 P10	X	
C		
W M	X	
RES CONTROL	X	X
FFIC		

CLASSIFICATION:

UNCLASSIFIED	Y
CLASSIFIED	X
CONFIDENTIAL	
SECRET	

HORIZONTAL CLASSIFIER
SIGNATURE

[Signature]
(24/93 0004)
TE

REPLY TO RFP CC NO:
750 RF93

OPTION ITEM STATUS
OPEN CLOSED

PARTIAL

APPROVALS:

DESIGNER & TYPIST INITIALS

ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCM
BY G. T. Ostdiek <i>[Signature]</i>
DATE 5-5-93

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Tasks 2 and 3. Prepare Technical Memoranda, if Appropriate.

In light of the above evaluation, the preparation of technical memoranda is not appropriate at this time.

Task 4. Include an Evaluation of Bald Eagles in the EE Reports.

A discussion of Threatened & Endangered species is part of the environmental evaluation report outline for all OU's. END personnel will insure that a thorough evaluation of Bald Eagles is included in each Phase III RFI/RI report.

Summary

END personnel point out that the attempt by Bald Eagles to nest down-drainage and down-wind of RFP is yet another indicator of the environmental health of the area. The eagles are a valuable indicator of the absence of ecological stressors. In my estimation, the eagle phenomenon should be promoted as a key element in our on-going public relations campaign, and should not be viewed as a cause for concern.

Should you have any comments or questions, please contact Fred Harrington at X8744 or Mike Arndt at X8509.



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Associate General Manager
Environmental Restoration Management
EG&G Rocky Flats, Inc.

FAH:mad

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