

**439**

**R-009-1001.9**

**SOUTH PLUME EE/CA COMMENTS**

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**CITIZEN/DOE-FMPC**

**2**

**COMMENT**

**OU5**

## South Plume EE/CA Comments

The following comments pertain to the Draft South Plume EE/CA dated March 23, 1990.

- 1) Not all of the reasonable alternatives have been presented in the EE/CA. All alternatives that the public might believe would be possible should be discussed, at least briefly, with the reasoning as to why they were eliminated from consideration early on. That way the public could have confidence that the final alternative chosen was truly the best.
- 2) How is removing U from ground water and discharging it untreated into the river an improvement? At least in the plume we can locate the U for the final remediation action. Once in the river, it is not retrievable. You have actually increased its mobility, which would be counter to the goals of a removal action. It hardly seems fair to the downstream population and environment to simply throw our contaminants into their water. The total uncontrolled U in the environment remains the same. It's just spread over a larger area.
- 3) The alternative of pump and treat from the edge and the center of the plume simultaneously should have been discussed.
- 4) More recent RI/FS analytical data should be incorporated than Sept. 15, 1989. (Executive Summary, page 4)
- 5) Why does the EE/CA use effluent discharge data from 1985-1987? The 1988 monitoring report is out and the 1989 data should also be available. (Section 2, page 5)
- 6) All contaminants, both chemical and radiological, should be considered, not just U. They are all of concern.
- 7) A chart showing all radionuclides and potentially hazardous chemicals that are in the South Plume should be included in the EE/CA, perhaps in the Appendix. For each, the established drinking water limits should be shown with a reference as to the source of the information. If there is no established limit, a full discussion of what theoretical limit to use and how it was derived would be useful.
- 8) The EE/CA states that the plume will not reach the Great Miami River in the next 5 years. When is it projected to actually reach the river?
- 9) None of the alternatives discussed addressed controlling the sources of the contamination. It is stated that the full RI/FS will address this. However, did any of the earlier eliminated EE/CA alternatives attempt to do so?

10) Table 2-1, Section 2, page 18, says organics are in the water of the South Plume, but that the magnitude and extent are unknown. Why is this unknown? How can the EE/CA go forward, not knowing what else may be in the water and what the total environmental effects might be? Also, could the organics cause violations of discharge permits when added to the usual FMPC discharges?

11) Figure 2-17 shows dark triangles to be residences with unknown water supplies. There are many on the map. Have the residents been asked about their water supply? The note says the map may not show every groundwater user in the area. Will further RI work be done to determine all users of the groundwater? Accuracy of this information is important to the public and for making decisions.

12) Section 2, page 40 states that the plume is moving at about 220 feet per year. Table ES-1 says the leading edge of the plume would migrate between 440 and 1100 feet depending on the chosen alternative. Is this per year? If so, then the alternatives would increase the plume flow? Or is the term leading edge different from that used on page 40? This is confusing to the public.

13) Would ingestion while showering be another exposure pathway that should be considered?

14) Was the possibility of a new effluent line to the Great Miami River explored, rather than pumping the water back up to the FMPC?

15) It is the public's understanding that the FMPC regularly exceeds the DOE discharge limits. If this is true, how can any additional discharge of U be considered?

16) The EE/CA needs to explain in greater detail how the treatment possibilities work. Include their purposes and strong and weak points. Be sure to include those mentioned in Section 4, page 14 and any others the public might think might be reasonable. Could a distillation process remove the U?

Please remember that all of these comments were made by a non-expert. While the answers to some of the questions may seem trivial to the experts, it is still important to be as clear and thorough as possible if community acceptance of alternatives is to be maximized.

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