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**SUMMARY OF DOE RESPONSES TO EPA COMMENTS TO THE FMPC RI/FS
COMMUNITY RELATIONS PLAN JUNE 4, 1990**

06/04/1990

DOE-FMPC
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REPORT

USEPA

SUMMARY OF DOE RESPONSES TO EPA COMMENTS
TO THE FMPC RI/FS COMMUNITY RELATIONS PLAN

June 4, 1990

EPA Comment Quoted First: DOE Response Provided in Boldface Type.
*Indicates Comments Not Incorporated in DOE Response.

GENERAL COMMENTS:

- *1. The comments presented in U.S. EPA's February 12, 1990, letter were generally addressed, with one major exception. References to the National Environmental Policy Act (NEPA) were not removed from the CRP. In fact, the NEPA section was expanded. If U.S. DOE has community relations obligations to NEPA, these should be expressed in a separate document. DOE chooses to retain references to NEPA in the CRP.
2. The CRP should be reviewed to identify and correct grammatical and typographical errors, including portions of sentences that are repeated, incomplete sentences, and misspelled words. Incorporated.

SPECIFIC COMMENTS:

3. Title page and Forward: The CRP is not exclusively for RI/FS, but for entire remedial process (through RD/RA) and the title should be changed to reflect this fact. As previously discussed, the CRP can also address the removal actions. Incorporated in title page, foreword, and introduction.
4. Section 1.1, Page 1: "U.S. DOE" and "U.S. EPA" should be used throughout the CRP instead of DOE and EPA. Incorporated.
- *5. Section 1.2, Page 2: The second bullet alludes to NEPA. All NEPA references should be struck throughout the entire CRP. See General Comment #1.
6. Section 1.2, Page 2: The seventh bullet under activities should read: "Information repositories, known locally as "reading rooms". Incorporated.
7. Section 2.3, Page 4: When referring to the name of an organization such as the Atomic Energy Commission, second-referencing (AEC) should only be done when the acronym is going to be used again. This comment should be applied throughout the document. Additionally, some of the acronyms established are not consistently used. This style error is present throughout the CRP. Incorporated.

- 8. Section 2.3, Page 4: The first sentence of the second paragraph needs a comma somewhere (gaseous diffusion plants or machines uranium ingots and billets).
Sentence punctuated.
- 9. Section 2.3, Page 4: At the end of the second paragraph insert "Community-Right-to-Know" after SARA Title III. The public may not know what SARA Title III is.
Incorporated.
- 10. Section 2.3, Page 4: At the end of the first sentence of paragraph 5, "~~dust collector system~~" is referenced. This should be "dust-collector system." A general rule of grammar is that when one or more adjectives are used on a single noun, the adjectives should be hyphenated to avoid confusion. The CRP should be thoroughly reviewed and hyphenate where appropriate.
Incorporated.
- 11. Section 2.3, Page 5: "Improved stormwater runoff control" should be "stormwater-runoff control". On page 10 of Section 3.5, the third bullet uses "storm water runoff".
Incorporated.
- 12. Section 2.3, Page 5: The first sentence of the last paragraph is awkward, "...after DOE acknowledged that it had been made aware of numerous...". The strange syntax sounds bureaucratic and disingenuous.
Sentence deleted.
- 13. Section 2.3, Page 6: The second sentence refers to OEPA, which has not been first-referenced as the Ohio Environmental Protection Agency. Also, in the same sentence, note that the Ohio Department of Health is second-reference (ODH). On the same Page, paragraph 4, the acronym is abandoned and ODH is spelled out. Proof-read the CRP for this mistake.
Incorporated.
- 14. Section 2.3, Page 6: The fourth sentence in paragraph one refers to a DOE "Tiger Team." Present a short explanation of what the Tiger Team is.
Incorporated.
- 15. Section 2.3, Page 6: RCRA needs to be explained in the second paragraph, by spelling out the acronym on first reference and offering a short explanation.
Incorporated.
- 16. Section 2.3, Page 6, paragraph 3: NPDES needs to be spelled out and explained.
Incorporated.

- 17. section 2.3, Page 6, paragraph 4: Style usage dictates that politician's be fully named on first reference. The third sentence should read, "In 1988, Governor Richard Celeste....".
Incorporated.
- 18. Section 2.3, Page 6: Sentence 4 of paragraph 4 ends with "health and safety and environmental records." Should this be health and safety, and environmental records?
Incorporated.
- 19. Section 2.3, Page 6: Last sentence should end "...negotiated and signed April 9, 1990." There are several places throughout the CRP where this change should be made.
Incorporated.
- 20. Section 2.3, Page 7: Sentence 3, paragraph 1, begins with the pronoun "they." What is the antecedent, members of Ohio's congressional delegation or the U.S. Congress?
Clarified.
- 21. Section 2.3, Page 7: Sentences 4 and 6 should read "U.S. Representative Tom Luken," and "U.S. Senator John Glenn."
Incorporated.
- 22. Section 2.3, Page 7: Paragraph 2, sentence 1, correctly reads "class-action suit." However, there are several other instances where "class action" appears. Multiple adjectives should be properly hyphenated throughout CRP.
Incorporated.
- 23. Section 2.3, Page 7; The last sentence of paragraph 2 could be changed to "Other miscellaneous individual lawsuits have also been filed against." This would avoid the use of "in addition" twice within a few words.
Incorporated.
- 24. Section 2.4, Page 7: The second sentence is awkward. It reads as if the RI/FS is being defined as itself.
Clarified.
- 25. Section 2.4, Page 7: The last sentence of this section's first paragraph should reflect that the agreement was signed April 9, 1990.
Incorporated.
- 26. Section 2.4, Page 8: The third sentence should use the definite article and adjective "the April 1990 agreement" rather than indefinite article and adjective "a new agreement."
Incorporated.

- 27. Section 2.4, Page: The end of the second paragraph needs to be updated per the April 9, 1990, Consent Agreement.
Incorporated.
- 28. Section 2.4, Pages 8-11: The scrap piles were left out of the operable unit discussion.
Added to Table 2.1.
- 29. Section 2.4, Page 11: There is a noun/verb-agreement error in last sentence of first paragraph after bullets. Sentence should read "...risk assessments...evaluate", not "...risk assessments...evaluates."
Incorporated.
- 30. Section 2.4, Page 11: In the first bullet, "Engineering Estimate/Cost Analysis" should be changed to "Engineering Evaluation/Cost Analysis."
Incorporated.
- 31. Section 2.4, Page 11: Section 2.4 was revised to include the operable units as defined in the Consent Agreement. However, the definition for operable unit 5 refers to off-site environmental media. As stated in the Consent Agreement, operable unit 5 includes "all environmental media" not addressed under the other operable units. Also, the boundaries of the site are beyond the property boundaries.
Incorporated.
- 32. Section 2.4, Page 11: The last paragraph of section 2.4 should explain that the responsiveness summaries will be placed in the reading rooms.
Added.
- 33. Section 2.4, Page 12: The dates presented in the table are difficult to read. More space should be provided between the milestones and the dates (23 JUL 90 or 07-23-90).
Incorporated.
- 34. Section 2.4, Page 12: The discussion of community relations activities associated with removal actions is confusing for several reasons. First, since Section 2.5 discusses removal action history and status, it would be more appropriate to discuss the community relations activities that have taken place to date rather than future activities. Furthermore, the discussion implies that CRPs are required for those removals that also require an EE/CA and that it is dependent on whether it will take more than six months to plan a removal. This discussion should be deleted or clarified to reflect the revised National Contingency Plan (NCP), effective April 9, 1990, even though the Subpart K - Federal Facilities regulations have not been promulgated. The revised NCP states

that CRPs will be prepared for both (1) removal actions that will extend at least 120 days beyond the initiation of on-site activities, and (2) removal actions that will require at least six months from the time the lead agency determines that a removal action is necessary to the time on-site activities are initiated. The need for the CRP is therefore not necessarily related to the need for an EE/CA.

Discussion clarified: (1) Section 2.5 focuses on removal action history and status; (2) discussion about requirements for CRP is broadened to include all removal actions.

~~35. Section 2.5, Page 12: The third full sentence alludes to CRP's for each EE/CA. All response actions may be covered in one CRP and incorporated into the remedial response action CRP.~~

Incorporated.

36. Section 2.5, Page 13, third bullet: The third bullet should define "OU" in the text.

Incorporated.

37. Section 2.5, Page 13: The last paragraph refers to "specific brief CRP's" (should be "specific, brief CRP's). Again, one CRP can cover all response actions.

Reference deleted; a generic removal action community relations activity timetable is presented in Section 4.0.

*38. Section 2.6, Page 14: Paragraphs 2 and 3 should be revised to reflect U.S. DOE's recent request decision to consolidate administrative records.

DOE will make this change within 30 days after the announcement of the new location(s).

*39. Section 2.7, Page 14: This entire section should be deleted. It is irrelevant to the matter at hand.

See General Comment #1.

40. Section 3.0, Page 1, first paragraph, last sentence: Use "neither...nor."

Addressed.

41. Section 3.1, Page 1, first paragraph: Do not refer to the CRP as revision 3. This is an internal draft designation. This means nothing to the public.

Deleted.

42. Section 3.1, Page 1, second paragraph: 3,000.

Incorporated.

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43. Section 3.1, Page 1, second paragraph: Link second and third sentences.
Incorporated.
 44. Section 3.2, Page 3, first bullet: 5-mile.
Incorporated.
 45. Section 3.2, Page 4, first paragraph: information-needs.
Incorporated.
 46. Section 3.3, Page 4, first paragraph, fourth sentence: Use a comma, not a semi-colon.
Dash added.
 47. Section 3.3, Page 4: Strike "to the public" in the last bullet because of the way the sentence begins.
Deleted.
 48. Section 3.3, Page 5, first bullet: This should be rewritten to reflect the information repository/administrative record location and structure changes.
A separate bullet all ready discusses the Administrative Record (AR). It has been moved to precede the reading room bullet. Reference to AR modifications to date have been added. Future modifications to the AR are expected to be announced this summer. After such modifications are made, they will be incorporated into this plan.
 49. Section 3.3, Page 5, second bullet: The 'p' in phil should be capitalized.
Incorporated.
 50. Section 3.3, Page 5, third bullet: There needs to be a comma and hyphen in the second sentence. The verb "tended" should be in present tense. Hyphenate "well-informed."
Incorporated.
 51. Section 3.3, Page 5, fourth bullet: Use "safety-related."
Incorporated.
 52. Section 3.3, Page 5, second bullet: Put a period after "...RI/FS mailing list."
Incorporated.
 53. Section 3.3, Page 6, third bullet: Spell out "fiscal year."
Incorporated.
 54. Section 3.4, Page 8, first paragraph: Put a period after "referrals". The phrase "interviewee selection focused on" is awkward.
Addressed.
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- 55. Section 3.4, Page 8, sixth paragraph: "US News and World Report" should be "U.S. News and World Report."
Incorporated.
- 56. Section 3.4, Page 9, first paragraph: Use "class-action suit's summary trial" instead of "class action suit summary trial."
Incorporated.
- 57. Section 3.4, Page 10, first paragraph: Use a hyphen in "information-needs". What is meant by "receive this information"?
Addressed.
- 58. Section 3.5, Page 10, paragraph after bullets: Spell out "FBI" on first reference. Correct status of Consent Agreement. "residents" should be "resident's."
Incorporated.
- 59. Section 3.5, Page 11, fifth paragraph: The word "included" should be "includes". Explain what SANE-FREEZE is. Give first reference.
Not an acronym. Explanation incorporated.
- 60. Section 3.5, Page 11, sixth paragraph: The acronym for FRESH has already been established in the CRP.
Incorporated.
- 61. Section 3.5, Page 11, seventh paragraph: The acronym for the Ohio Department of Health should be used and first referenced earlier in the document where the acronym is used.
Incorporated.
- 62. Section 4.3, Page 3, third paragraph: Begin the sentence with "The meetings" instead of "They."
No. "The activities" is added for clarification.
- 63. Section 4.3, Page 3, fifth paragraph: The pronoun should be "its" not "their".
Incorporated.
- 64. Section 4.3, Page 4, continuing paragraph: End of sentence with "such as 30 days."
Incorporated.
- 65. Section 4.3, Page 5, after bullets: The U.S. EPA hotline telephone number 1-800-621-8431.
Incorporated.

- 66. Section 4.3, Page 5, second paragraph after bullets, third sentence: Use "also" instead of "as well."
Incorporated.
- 67. Section 4.3, Page 6, paragraph 7: Section 4.3 discusses RI/FS community relations activities. The perspective should be broader.
Section rewritten to include removal actions.
- *68. Section 4.3, Page 7, paragraph 2: The discussion of environmental impact statements is not appropriate to response ~~action~~ ~~community relations requirements~~ ~~and should be~~ ~~eliminated.~~
See General Comment #1.
- 69. Section 4.3: This section should also discuss the public notices required for each proposed plan and record of decision.
Incorporated.
- *70. Table 4.1, Page 8 and 9: This table lists RI/FS community relations activities and timing. Activities related to the EIS should be eliminated. This information can be presented in internal documents or those circulated to the public specifically for NEPA.
See General Comment #1.
- 71. Table 4.1: The operable units should be listed separately under the activities and not grouped together. Otherwise, it appears that activities will be combined.
Incorporated into table now identified as Table 4.2.
- 72. Table 4.1: Operable Unit 4 is listed twice under proposed plan activities.
Deleted in table now identified as Table 4.2.
- 73. Table 4.1: "Announce Draft ROD" should be changed to "Announce ROD".
Incorporated into table now identified as Table 4.2.