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**PUBLIC COMMENTS O.U. 3 PROPOSED PLAN
(OFFICIAL COMMENTS FROM FRESH)**

01/30/94

FRESH/DOE-FN

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COMMENTS

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L. Crawford

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P. 02

January 30, 1994

RE: Public Comments O.U.
3 Proposed Plan

Mr. Ken Morgan
Public Relations
U.S. Department of Energy
P.O. Box 398705
Cincinnati, OH 45239-8705

Dear Mr. Morgan:

The purpose of this letter is to provide official comments on the Operable Unit 3 Proposed Plan:

1. The Assistant Secretary of Env. Rest. & Waste Management, Mr. Thomas Grumbly, must sign the final IROD; along with the Fernald Site Manager (Mr. Hamric); U.S. EPA Director, President of FERMC0 and also an added letter of concurrence from the Ohio EPA.
2. The public must have a guarantee that waste storage is interim and that the long-term plan for waste is made in a timely manner. Interim must be defined in number of years.
3. There should be continuous monitoring of buildings as they are torn down and the results should be made available in a timely fashion.
4. The public must be involved in the long-term storage and disposal planning phase. They must also be kept apprised of situation on a regular basis. They must be allowed to see the spec's of interim-storage plans and ideas. As each O.U. waste storage issue arises, they must be added together and then work toward the long-term plan for waste storage & disposal.
5. Final permanent storage facility must be that, and not the interim-storage site. One cannot become the other -- they must be totally separate of one another.
6. Any documents relevant to this O.U. that are placed in the Administrative Record or the Reading Room, the community must be notified and afforded the opportunity to comment on them, if appropriate.
7. DOE/FERMC0 must show how this will save money and time. They must share their plans for D & D as we move through the process.
8. DOE/FERMC0 must look at the long-term waste plan before it can even think about interim-storage. It should be called "interim" until it's deemed "long-term" & "permanent"! They must define how long "interim" really is -- with a deadline or proposed deadline. They must re-evaluate at that time, with

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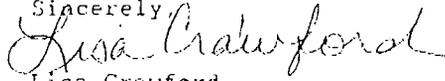
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community input, for the reasons as to why it's longer or there's no long-term plan as of yet.

9. The community must and will be walked through this process. This must be guaranteed. Roundtables should be held as future plans or updates occur.

If you have questions about these comments, please contact me as soon as possible. I look forward to seeing your official comments with regard to these attached comments.

Sincerely,



Lisa Crawford
President, F.R.E.S.H., INC.

LC/eac

cc: files

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COMMENTS ON THE OU 3 PROPOSED PLAN / EA FOR THE INTERIM
REMEDIAL ACTION

- * The terms "interim storage" and "temporary storage" can mean very different things to different people. The public needs and deserves a guarantee that the "interim storage" will not be allowed to become "permanent" because of schedule slippage or funding problems. An agreement that spells out how long "interim" may be and how the public can enforce this is sorely needed. It should be signed by top officials who have the power to sign such a guarantee.
- * Be sure that proceeding with this IROD does not bias the ROD or eliminate options, such as off-site vs. on-site storage.
- * Because the annual Environmental Monitoring report is issued so long after the monitoring is actually done, the public deserves to see the environmental monitoring results often, perhaps monthly, so they can be assured that the OU 3 IROD activities are not affecting the community's air, water, or environmental quality.
- * Also, the monitoring done specifically for the IROD should be made easily available to the public. An update at RI/FS meetings would be nice. Fast turnaround on analyzing samples is important so that any problems will be detected promptly enough for mitigating measures to be taken.
- * Developing accurate real-time monitoring should be a DOE priority.
- * On page 1-1 and 1-2 it states that it is DOE policy to incorporate NEPA values into the RI/FS process "wherever practical". Where was it not practical? How does the general public know that all of NEPA was really incorporated in the document if they aren't NEPA experts?
- * How does an EA on an OU relate to the RI/FS EIS being done for the whole site?
- * The terminology used is not exactly up-front and honest with the public. The fact is that the "interim" ROD is actually a "final" ROD for the portion of OU 3 that dealt with the buildings. Once the IROD is chosen and buildings come down, we won't be able to change that. It's final.
- * A FONSI should not be written before the public and regulators have had the opportunity to comment on the EA.

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