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OFFICIAL COMMENTS ON THE OPERABLE UNIT 2 PROPOSED PLAN

11/20/94

CITIZEN DOE-FN
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COMMENTS

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FERMCO OU2

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RE: DOE-FEMP
O.U.2 Proposed
Plan - Comments

Mr. Gary Stegner
Director, Public Information
U.S. D.O.E. Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Stegner:

The purpose of this letter is to provide my official comments on the Operable Unit 2 Proposed Plan. I want to make it very clear that I am commenting as an individual resident and not as the president of F.R.E.S.H., Inc. or as a member of the Fernald Citizens Task Force. So, my official comments as an individual citizens living around the Fernald FEMP I would like the following comments instituted into the final plan.

1. While I am not extremely happy with the possibility of having a on-site disposal cell, I believe the preferred alternative is the appropriate one, when considered in the context of overall site clean-up. I support the idea of a balanced approach where the low volume high concentration wastes go off-site for disposal and the high volume lower concentration wastes are disposed of on-site in a engineered facility.

2. The O.U. 2 ROD must place restrictions on the use of the on-site disposal facility. The following restrictions must be put into the ROD:

   a.) No off-site waste will ever be disposed of in this disposal cell or anywhere else on the Fernald FEMP property.

   b.) The waste acceptance criteria (WAC) for Uranium-238 must be set at a maximum of 360 pCi/g with the flexibility of being lowered based on other operable unit decisions and volumes. The WAC will be an upper limit concentration acceptable into the cell and will not be used as an "average" limit.

   c.) No hazardous waste of any kind will be disposed of in this on-site waste cell.

3. DOE should continue to review and consider new technologies which may reduce the volume and toxicity of waste being disposed of on-site. They must remain open to new ideas which

could possibly result in a safer waste form for on-site.

4. During the implementation of the preferred alternative, the DOE must use excavation and waste management techniques which will prevent the dilution of waste concentrations to meet the WAC's.

5. DOE must do real-time monitoring for discharges to the environment. Data obtained from the real-time monitors and any other monitoring activities should be provided to the public in a timely manner.

6. DOE should make a consorted attempt to include pollution prevention whenever possible during the design and operation of the OU 2 remedial action system. All of these should be included in the design of the system.

7. DOE must ensure the public at large that their involvement will not be discontinued during the RD/RA. DOE must commit in the ROD for OU 2 to continuing the on-going public involvement program during the RD/RA.

8. DOE must maintain within the OU 2 ROD that the government will maintain permanent ownership of the property associated with the OU 2 ROD. DOE ownership of this property is essential to maintaining institutional controls and limiting land-use to ensure protectiveness of this site.

9. While I'm nervous about granting the DOE a USEPA waiver of the Ohio solid waste siting criteria, I would much rather see a on-site waste cell instead of seeing the waste capped in place. But, at the same time, I would like the restrictions described in comment #2 to be included with this waiver.

In summation, the following issues must be considered for the ROD of OU 2:

* no off-site waste for disposal on-site at Fernald (never and none at any time)

* DOE/Government must maintain future ownership of the Fernald site (the entire Fernald site)

* if we must have a disposal cell, it must have at least a 300 foot buffer zone (more if possible) and it must be placed on the best geology of the site

* the community/public must have a say and part in the disposal cell construction, with specifics

* the level of detail in the ROD should be very specific and inclusive with the public's comments, (meet WAC's, no off-site waste, meets arars, etc.)

* there should/will be real-time monitoring (day to day); waste in/out; emissions during construction, etc.

* the use of the WAC as an upper limit - 360 pc/g; no averages and this will be a maximum.

* there will be no dilution to meet the WAC's - can't mix to lower the levels (this is totally non-acceptable)

* USEPA waiver of siting criteria should only be granted if the specifics in comment #2 are followed and adhered to. The waiver must and will state specifically that no waste from nowhere will ever be brought into the Fernald FEMP EVER!

* With regard to a future waste cell - there will be annual reports and 5 year reviews -- copies of all reports, correspondence and annual reports will be sent to local government agencies and concerned citizens who request them.

* During the RD alara principals will and must be utilized.

* Institutional controls must and will be used with regard to the on-site waste cell -- fences, monitoring devices, etc.

* There must and will be public participation thru the RD/RA process.

* This will be DOE/government land with deed restrictions and full disclosure about the land.

If you have any questions, comments or concerns with regard to these comments, please feel free to contact me.

Sincerely,

Lisa Crawford

Lisa Crawford, Resident
10206 Crosby Road
Harrison, OH 45030

Phone: (513)738-1688 or 8055

LC:eac

cc: files

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Fernald Residents for Environmental Safety & Health
P.O. Box 129
Ross, Ohio 45061

FAX COVER SHEET

Office/~~Fax:~~ (513) 738-8055

TO: Gary Stegner

ORGANIZATION: DOE - Fernald Area Office

DATE: 11/ /94

FAX NUMBER:

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COMMENTS:

Here's my O.U. 2 comments - mine, not for FRESH or F.C.T.F.

Thanks!

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