

Comments on the Explanation of Significant Differences for OU 5 pertaining to the change in the MCL for uranium in drinking water from 20 to 30 parts per billion:

- If the change is made, this must not start a trend toward changing other cleanup levels and making the community accept an inferior cleanup to save money.
- When the site cleanup is considered complete, the AWWT should still be kept in cold standby for at least 5 years, so that it can be used again if a rebound effect manifests itself.
- Question: If more studies are done in the future and the level goes back down after the cleanup is considered “complete”, will the EPA require the DOE to start pumping again?
- Because the background level for uranium in water for our area is about 1 ppb, the community could have pushed for a cleanup that would have been all the way back to background. 20 ppb was a compromise that considered risk and technology constraints. The ALARA principle of “as low as reasonably achievable” should be followed for the cleanup at Fernald. Science is not able to determine the effects of the combination of all of the chemical and radiological exposures that humans are now exposed to in their environment. In order to reduce the effects of these multiple concurrent exposures we should strive to keep the exposures of each substance “as low as reasonably achievable”.

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