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**DOE FEMP - OU3 PPP COMMENTS (MS. CRAWFORD'S COMMENTS ON
THE OU3 PROPOSED PLAN)**

05/01/96

**LISA CRAWFORD DOE-FN
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COMMENTS**

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May 1, 1996

RE: DOE FEMP -- OU3 PPP
Comments

Mr. Gary Stegner
Director, Public Information
U.S. DOE Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45235-8705

Dear Mr. Stegner:

Below you will find my comments on the O.U. 3 Proposed Plan. They are as follows:

1. I believe that the selected alternative is the appropriate one. I also believe that the balanced approach -- low volume, high concentration wastes go off-site for disposal and high-volume, lower contamination wastes are disposed of in an engineered facility on-site. I believe that this is the best strategy for remediation of the FEMP facility.
2. The following restrictions should be placed on the O.U. 3 ROD:
 - a.) no disposal or long-term storage of off-site waste in the proposed engineered disposal facility or any other facility located on the FEMP property;
 - b.) DOE must commit to the ALARA mass based WAC for Tc-99 of 59 grams;
 - c.) No characteristic hazardous waste should be disposed of in this facility.
3. DOE should commit themselves to developing a policy for defining criteria for implementing recycling of materials, rather than disposing of them as waste. Along with this commitment DOE should allow the public to review and comment on this policy with regard to OU 3.
4. DOE should commit to reuse any materials on-site to the extent possible as well as encouraging other DOE facilities to reuse Fernald materials.
5. DOE should commit to being open to considering new technologies that will reduce volume, toxicity and mobility of wastes being disposed of on-site. I believe that DOE should remain open to new technologies which could render the on-site waste safer.

6. DOE should commit to including and/or developing real-time monitoring for discharges to the environment coming from remedial actions. Data obtained from real-time monitoring and any additional monitoring should be provided to the public in a timely manner.
7. DOE should attempt to use pollution prevention activities when possible and all available methods to reduce or eliminate discharges and releases from the demolition and disposal activities should be considered during the design of remedial activities.
8. DOE must make a commitment to the public that their involvement will not be lessened during the RD/RA. DOE should commit in the ROD for OU 3 to having on-going public involvement during the RD/RA.
9. DOE must make firm commitments that the land-use used to develop the clean-up standards is maintained into the future. DOE must and will retain ownership and maintain institutional controls and limited land-use to ensure protectiveness of the FEMP site.
10. With regard to the issue of "free-release" -- I believe that there should be a public work-shop held to have a further discussion regarding this specific issue. A commitment should be made to the public to assure them that items of any kind that leave the FEMP site will be used in a responsible manner and not just sold and lost into unknown and unsuspecting hands.

While I agree with free-release for recycling, again this is an issue that needs to be discussed further. Releasing items such as metals/steel/etc. for recycling for metal boxes that will then ship wastes is a satisfactory way of releasing these contaminated items. For other more public purposes, this is not acceptable.

DOE should commit to the public that they will create a "recycling program" and have full public input into this process. This would eliminate what is unsatisfactory and what is satisfactory to the public at large. This goes back to comment #3.

Please feel free to contact me if you have any questions and or comments regarding these comments.

Sincerely,

Lisa Crawford

Lisa Crawford

