



MEMO

December 17, 2002

To: All FCAB Members

Re: January meeting dates

Please note that the January Stewardship Committee meeting and the Full CAB meeting dates have been changed. The new dates are as follows:

Stewardship Committee Meeting

January 21, 2003 6:30 p.m. T-1 trailer

Full CAB Meeting

January 22, 2003 6:00 p.m. Crosby Senior Center



MEMO

December 17, 2002

To: All FCAB Members
Re: Stewardship Plan

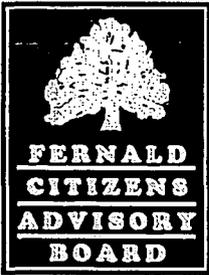
The site must submit a Comprehensive Stewardship Plan to DOE Headquarters by the end of January 2003. We distributed and reviewed Version 3 of the plan at the December 9 Stewardship Committee meeting, and an electronic copy of the plan will be posted on www.fernaldcab.org as soon as it is received. In addition, a summary of the plans contents is attached.

Please provide any comments or questions regarding the plan to Doug Sarno by **Friday, January 3**. The Perspectives Group will compile comments from FCAB and Stewardship Committee members, which will be discussed and finalized at the January meetings. Key questions to consider during your review:

- Is the plan well organized? Does it provide a sufficient amount of detail?
- Does the plan clearly communicate what is required for long-term stewardship of the site?
- The scope of the plan covers monitoring and maintenance of the OSDF and restored areas. Will this adequately support the remedies that are being followed at the site? Is supporting the remedy an appropriate scope?
- Section 4 outlines stewardship activities for the OSDF. Will these activities adequately protect human health and the environment?
- Section 5 outlines stewardship activities for the restored areas. Will these activities adequately protect human health and the environment? Do they adequately address stewardship of the ecological restoration projects?
- Section 6 addresses public participation during planning and implementation of long-term stewardship. Will these guidelines satisfy community needs for involvement?
- Section 7 outlines information management requirements for long-term stewardship. Will these requirements satisfy community needs? Does this section satisfy the recommendations from our Records Feasibility Study Report?
- Section 8 discusses funding for long-term stewardship at Fernald. Does this section provide adequate assurance that stewardship activities will be funded?

Please provide your comments by either email (djsarno@theperspectivesgroup.com), fax (703.837.9662), or mail them to: The Perspectives Group, 1055 N. Fairfax St., Suite 204, Alexandria, VA 22314.

If you have any questions about the Comprehensive Stewardship Plan or providing comments, or you are having difficulty accessing a copy of the plan, please contact Doug or David.



REPORT OVERVIEW

Report Title: Comprehensive Stewardship Plan
Report Date: December 2002
Summary Date: December 17, 2002

What is the purpose of this report?

The Fernald Environmental Management Project must submit a long-term stewardship plan to DOE Headquarters by January 31, 2003. The plan should conform to DOE's *Long-term Stewardship Planning Guidance for Closure Sites*, released in August 2002.

The first two sections of the *Comprehensive Stewardship Plan* provide background information on long-term stewardship and the Fernald Site. Page 7 of the plan notes, "Departmental policy and funding priorities regarding long term stewardship emphasize supporting the remediation remedies as described in Fernald's Records of Decision." As such, construction of public-use amenities is not covered by this plan. The plan also indicates that current DOE policy would support funding a "utilitarian-type structure for records storage purposes," but not a multi-use education facility or interpretive center.

The bulk of the plan outlines activities required for stewardship of the OSDF and other remedies, stewardship of restored areas (i.e., portions of the site not covered by the OSDF and its buffer area), public participation, and records management. The plan also includes a section on funding long-term stewardship activities at Fernald.

This plan will continue to be revised as the site nears closure and DOE commitments are clarified.

Scope of Stewardship at Fernald

Section 3 of the plan provides an overview of the scope of stewardship at the Fernald site. Full-scale stewardship is anticipated to begin at the end of Site Completion on September 30, 2007. This plan delineates two major categories of stewardship activities at Fernald: 1) maintenance of the remedy and 2) stewardship in restored areas of the site. Note that this plan does not address the construction of public-use amenities (e.g., trails) or an education facility at the site.

Stewardship Activities Required

Section 4 (pages 28-37) details the stewardship requirements for the OSDF. This section states that the ROD for OU5 obligates DOE to maintain responsibility for the OSDF for a minimum of thirty years and the OU2 ROD requires that the Fernald site remain under federal ownership in perpetuity. After closure of the site, management responsibilities for the OSDF will be transferred to the DOE Grand Junction Office. Each responsibility—including monitoring and maintenance of institutional controls, leachate systems, and caps—is detailed in this section. The section ends with tables that present actions that are required and the frequency and scope of those actions (pages 31-37). A sample checklist for inspection of an OSDF cell is included as Appendix A of the plan.

Section 5 (pages 38-44) outlines requirements for stewardship of the restored areas at the site. Restored areas may include ecologically restored areas (e.g., wetlands) and cultural resource areas (e.g., Native American burial sites). As steward of the site, the DOE Grand Junction Office will have the primary responsibility for these areas; however, the plan acknowledges that DOE may cooperate with another entity to meet these requirements. Stewardship of restored areas will focus on ensuring that applicable laws and regulations are followed and that site infrastructure (e.g., fences and access roads) and any public use amenities constructed at the site are maintained in a safe condition. The plan emphasizes that construction of public use amenities will depend on the outcome of the Natural Resources Injury Settlement. The section includes a table that details monitoring for institutional controls, monitoring and maintenance of public use amenities, monitoring and maintenance of reburial sites and cultural resource areas, and monitoring and maintenance of restored areas (pages 42-44). The plan states that requirements for stewardship of restored areas could be revised per the impending Natural Resource Injury Settlement.

Section 6 (pages 45-47) provides guidelines for public participation for long-term stewardship planning. The plan states that, over the next several years, the public and other key stakeholders will continue to receive information regarding stewardship planning activities and to play an active role in decision making for post-closure management of the site. Information regarding current public participation processes, the FCAB and FRESH, and other potential stakeholders is provided in the plan. The plan also includes a brief list of key decision points that will require public input (pages 46-47). Information in the plan regarding public participation during long-term stewardship is limited to the CERCLA Five-Year Review reporting process.

Section 7 (pages 48-51) outlines the types of data needed to support stewardship activities and requirements for records management. This section also includes information on how that data will be made accessible to the public and other stakeholders. Categories of information required for stewardship will be clearly summarized in a Records Summary Narrative, which is described in the plan. The plan states that one way for DOE to accommodate public information needs is to develop a searchable centralized, long-term data/image repository. The DOE Grand Junction Office will bear the primary management responsibilities for information needed for long-term stewardship and any centralized system to provide stakeholders with access to records or copies of records. The plan also notes that stakeholders will have access to information generated during long-term stewardship, such as monitoring reports. The proposed education facility is noted as a potential storage area for an information repository. The plan includes a table that summarizes four categories of required information: historical data, RI/FS process and results, remediation data, and post closure data (page 51).

Funding for Long-Term Stewardship

Section 8 (pages 52-53) discusses stewardship costs. This section summarizes what elements of stewardship those costs will include and not include. The plan states that annual DOE budgets are anticipated for monitoring and maintenance of the OSDF and restored areas. Sources other than remediation and long-term stewardship funding need to be identified for the construction of public use amenities or an education facility. For the time being, long-term stewardship activities will be funded through the annual appropriations process, as line items in the DOE Grand Junction Office budget.