



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF: \_\_\_\_\_

Mr. Johnny W. Reising  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

SRF-5J

RE: OU 4 Dispute Response  
to Public Comments

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed the response to public comments on the July 22, 1997, Operable Unit (OU) 4 dispute agreement. Based on the received comments no changes are required to the dispute agreement.

In the future, if it is deemed necessary that a change in a supplemental project occur the United States Department of Energy's (U.S. DOE) may propose an alternate project as specified in Paragraph 13 of the dispute agreement.

Attached is a final copy of the response to public comments. A copy is being distributed to all commentors. Please make a copy of this document available with the administrative record at the public information center.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric  
Remedial Project Manager  
Federal Facilities Section  
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO  
Bill Murphie, U.S. DOE-HDQ  
John Bradburne, FERMCO  
Terry Hagen, FERMCO  
Tom Walsh, FERMCO

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bcc w/attachments:  
Frances Barker, Tetra Tech  
Brian Barwick, ORC  
Sue Pastor, OPA

**U.S. EPA RESPONSE TO COMMENTS  
ON THE OPERABLE UNIT 4 JULY 22, 1997, DISPUTE AGREEMENT**

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COMMENTOR:

John S. Applegate, Chairman  
Fernald Citizen's Advisory Board

COMMENT:

I am writing with regard to the Supplemental Environmental Projects that were identified at EPA's August 26 Public Meeting. The Fernald Citizen's Advisory Board is disappointed that we were not notified of these projects earlier and that we did not have the opportunity to be involved in their development. The approach to development of these projects was not in keeping with the very open and early approach to public involvement that the Department of Energy has established at Fernald. This is especially unfortunate given the wonderful opportunity these projects present to enhance the site and surrounding communities.

Because of insufficient time between the public meeting and the end of the public comment period, we have not had the opportunity to call a meeting of the Natural Resources Committee of the Advisory Board and cannot comment on the specific proposals made by the U.S. EPA. In addition, we do not feel that enough information was presented on these projects to allow for meaningful input. We would, therefore, request that a 30-day extension be made in the public comment period for the purpose of evaluating the Supplemental Environmental Projects only. Because so few details were provided on these projects, we would also like to see all of the details available, particularly with regard to implementation and cost. We also understand that a number of other projects were considered and rejected. We would very much appreciate seeing a list of these projects with all available details.

I do realize that these matters were the subject of dispute resolution, which is your practice to keep confidential. However, the dispute is now resolved, and in any event the legal context of an important issue for Fernald should not determine whether or not citizens can participate in it.

The Citizen's Advisory Board is looking forward to seeing the details of these proposals and being a constructive participant in their selection.

RESPONSE:

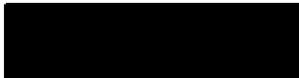
During negotiations, the concept of extended schedules and environmental projects, as well as a monetary penalty, was discussed with the Citizen's Advisory Board. As with the previous two dispute settlements, the specifics of all portions of the settlement were not revealed until the dispute was settled. Therefore, U.S. EPA did not handle this situation any differently than past disputes which also included environmental projects. Regarding the specific cost and implementation schedules for the environmental projects, the information you have is the

information made available to U.S. EPA. The dates specified in the dispute agreement are milestones for U.S. DOE to submit more detailed scope, schedule and cost information for a specific project. U.S. EPA has not presented a list of other projects that were discussed during negotiations, because they were not selected either (1) because they would not have been implemented at the site, regardless of the dispute, or (2) they were not related to site activities or impacts.

U.S. EPA granted the extension request through October 3, 1997, in a letter to you dated September 11, 1997. Also, at that time more detailed information on the environmental projects selected and rejected were provided. U.S. EPA is willing to share and discuss information on all the environmental projects as it becomes available to U.S. EPA.

COMMENTOR:

Mr. Dana H. Batchelde  
FERMCO

COMMENT:

My initial reaction to this dispute resolution agreement (settlement) is that the U.S. EPA is letting the U.S. DOE off too easy. According to the revised due dates, we're wasting more time in getting the important jobs done in a timely manner. For example, the new draft Silo 1 and 2 ROD amendment is 12/29/2000. This is approximately 3 years from now.

The most important and hardest task facing Fernald and the DOE is the cleanup of the Silos. I feel that Fernald was on the right track with the vitrification Pilot Plant. They should have been able to complete their phase I and phase II testing on site. Instead, this facility is at idle.

We've spent 40 million plus on the vitrification pilot plant. Let's put that facility back in use on the real waste of Silos 1 and 2. We could then use cementation technology on Silo 3 if needed.

I'd like a reply to my comments on this issue. Thank you for your time.

RESPONSE:

The revised schedule for submittal of the amended ROD for Silos 1 and 2 is based on the input of proof of principle data to be obtained from vendors regarding potential remedies for Silo 1 and 2 materials. Although the pilot plant was progressing there were several problems encountered. Eventually, the melter failure placed the path forward for the Pilot Plant in question. Based on input from DOE internal review teams, the independent review team, and stakeholders it was agreed that the preferred path forward was to incorporate data from other vendors that can demonstrate an ability to treat the waste and meet disposal facility criteria, before committing to a specific technology to treat the Silo materials.

COMMENTOR:

Jim Bierer  
Chair, Natural and Cultural Resources Committee  
Fernald Citizen's Advisory Board

COMMENT:

The Natural and Cultural Resources Committee of the Fernald Citizen's Advisory Board has reviewed the Supplemental Environmental Projects recommended by EPA as part of the OU4 dispute resolution. In general, the committee finds that the descriptions of the projects are vague and do not contain essential information, such as detailed cost estimates and details on how the projects would be performed. Based on the limited information we were presented, the committee makes the following recommendations:

1. Project 1 does not offer any substantial contribution to the Fernald site or to the community. The area surrounding the site already contains significant greenspace. The acquisition of additional off-site land for this purpose is not in the community's interest. We strongly oppose this option.
2. The committee does not feel that Projects 2 and 3 are bona fide supplemental environmental projects. These activities should be conducted anyway as a matter of course in the resource restoration process at the Fernald site.
3. Projects 4 and 5 are in close alignment with the philosophy of the original Citizen's Advisory Board recommendations by removing materials from the site and limiting material that is placed in the on-site disposal facility. We strongly concur with these projects.
4. Recycling and reuse are of paramount importance to the Fernald Citizen's Advisory Board. Considering this, we would like to take this opportunity to encourage the EPA to look for recycling and reuse opportunities at the site and to consider new and alternative technologies whenever possible. We would prefer to see the vast majority of SEP monies go to such projects.
5. One of the biggest successes at Fernald has been the reinternment of Native American remains. The committee feels that additional sites at Fernald could be offered for such reinternments and that this possibility should be considered as another option for SEP monies.

The Natural and Cultural Resources Committee hopes that you will consider these recommendations for these Supplemental Environmental Projects and in future activities at the site.

RESPONSE:

The information provided to the committee in U.S. EPA's September 11, 1997 letter to the Fernald Citizen's Advisory Board provided all the information transferred between U.S. EPA and U.S. DOE regarding the environmental projects. Further information such as detailed scope, cost and schedule will be provided in the various work plans as specified in the dispute agreement.

Development of a conservation area adjacent to the Fernald facility is consistent with the ultimate future land use of the site. Once remediation is complete, the majority of the facility will be available for recreational use. This conservation area project involves obtaining easement rights for property currently not being used for other activities, which is most suitable for such a conservation area and may provide a "buffer zone" to the facility. This approach will not be converting other utilized land to conservation areas, but most likely establishing a conservation area in a current area not being, or likely to ever be, utilized for other purposes. Further details on the conservation area will be submitted by U.S. DOE to U.S. EPA and will be available to stakeholders on November 21, 1997.

Projects 2 and 3 are environmental projects consistent with the long-term remediation of the site. The wild bird and wild flower habitat area is directly consistent with the future recreational use of the property. Also, large-scale excavations will occur over the majority of the site. The ability to restore the land to such recreational uses and the successful development of plants and other species after excavation is essential. These research projects are critical to determine which species of flora and fauna may be most appropriate, along with an ability to measure success of such projects. Absent this agreement, U.S. DOE would not be obligated to conduct these studies.

U.S. EPA concurs with the Advisory Board's position that recycling and reuse is essential to the facility and encourage such activities whenever feasible. The reinternment of Native American remains is another interesting project to consider. If it is determined that establishment of a conservation area or one of the other environmental projects is not feasible, the dispute agreement allows U.S. DOE to propose another project. If another project is recommended all stakeholders will be involved in the decision process and notified at that time of a change in the proposed environmental project.

COMMENTOR:John Anthony Blair  
COMMENT:

This letter is written about remediation of the silo waste at Fernald in Operational Unit 4 (OU4), also known as CERCLA-RCRA Unit 4 (CRU4), or the K-65 silos. Radium-226 has been identified as a needed target material for making short-lived, alpha-particle-emitting isotopes for fighting cancer and possibly even AIDS.

The radium-containing material at Fernald has been identified as the premier source of radium in the United States. A study by the University of Cincinnati has shown that the ten-thousand metric tons of material contains at least 3,770 grams of radium or less than three tons of material per gram of radium. E. R. Landa in his article "The First Nuclear Industry" (Scientific American, pp. 180-193, November 1982) stated that the most concentrated natural material contained about ten tons of ore for each gram of radium. Thus the radium at Fernald is nearly three times as concentrated as the best available natural material.

Should the radium be extracted from the K-65 materials, then much of the radiation problem could be solved. Removal of radium would also mean removal of radon. Because radium could be such a valuable resource, serious consideration should be given to extraction as an option for cleaning up this problem. Short of that, the radium from the waste stream should be recovered either at the beginning or the end of whatever process is chosen. Thank you for this opportunity to express my views.

RESPONSE:

DOE has preliminarily investigated the potential for removing radium materials from the K-65 materials in the past. However, no viable, cost-effective methodology for such extraction has been developed. Due to the various other impurities in the K-65 materials and the physical nature of the materials, extraction of radium materials does not seem possible, particularly at the levels described above.

If future treatment and radium extraction technologies develop, this possibly could be an option. The material will be disposed at a known location and may be retrievable if necessary. However, at this time, the existing treatment and disposal path forward appears most feasible.

COMMENTOR:

Lisa Crawford  
FRESH  


COMMENT:

My organization is still upset and we're probably going to be upset for a little while over the fact that decisions are made at a headquarters level and we were just kind of told what was going to happen with this issue.

I still have some very, very serious questions about this conservation area close to the site. I am really concerned about a long term commitment. I think that is an issue and the money is a concern for me.

The research grant. Personally, I need some more information before I can say yea or nay and endorse that.

I like the recycling and again I think we may need to go back and look at the methodology documents that were just recently released. One may plan off of another one and we need to be careful.

Regarding Silo 3 and Silos 1 and 2, I think we need to take a good hard look at the RFP's as they start to come out. I really think we need to look at the structural integrity of Silos 1 and 2 since we are putting them on the back burner. I think Nina mentioned there is something planned, since we are not going to technically do anything for maybe six or eight years.

DOE should have to ask Congress for the whole \$1.1 million. Congress does not like it when DOE gets fined and if we go up there and they say well, they fined us \$100,000. Or they got supplemental projects for the millions, I think Congress needs to know, and I would encourage you all to make sure that they are told. Congress can slap their hands a lot better than we can.

RESPONSE:

All of the information provided to stakeholders regarding the dispute was handled in a fashion consistent with past disputes. Any information which could be discussed during negotiations was provided as early as possible to make all stakeholders aware of U.S. EPA's position on these issues.

Development of a conservation area adjacent to the Fernald facility is consistent with the

ultimate future land use of the site. Once remediation is complete the majority of the facility will be available for recreational use. This conservation area project involves obtaining easement rights for property currently not being used for other activities, which is most suitable for such a conservation area and may provide a "buffer zone" to the facility. This approach will not be converting other utilized land to conservation areas, but most likely establishing a conservation area in a current area not being, or likely to ever be, utilized for other purposes. Further details on the conservation area will be submitted by U.S. DOE to U.S. EPA and will be available to stakeholders on November 21, 1997.

Information regarding the research grants will be available by November 21, 1997. The recycling work plan is currently available for review in the PEIC. Concerns over recycling methodology are important and should be reiterated to U.S. DOE in comments on the recycling workplan or in future public meetings.

U.S. EPA along with all of the stakeholders will review the RFPs for the Silo projects. U.S. EPA is also concerned with the integrity of the Silos. U.S. DOE is currently investigating early waste retrieval of the Silo materials to insure better storage integrity and prepare the material for its ultimate treatment that will be decided in the amended ROD.

Based on the facts and circumstances resolving the dispute and the subsequent settlement, U.S. EPA believes the revised schedules, lesson-learned document, environmental projects and monetary penalty adequately resolve this issue. Although, U.S. DOE is not required to formally request funds other than the monetary penalty from Congress, representatives are most likely aware of the entire settlement.

COMMENTOR:

Vicki Dastillung  
FRESH  


COMMENT:

I am concerned about the integrity of the silos and the bentonite cap. It may not last for the period of time that we must wait for the ROD changes to occur. I hope EPA will monitor the situation carefully.

If they award these multi-technical contracts for proof of principal, I would hope that they would not allow those contracts to be given that would push us away from vitrification. Since vitrification is more innovative than other kinds of technologies, there may be a bias toward other technologies leading away from vitrification.

I think that the conservation areas and research grants are nice, however, I would want to see the details of those projects and find out more about how the money was going to be spent.

Butler County lost 300 and some acres when the Girl Scout camp closed partly due to fears about Fernald and that area would have remained pretty much natural habitat. Butler County might be more interested in conservation areas.

DOE spent quite a bit of money hiring people to do independent reviews with the team and within DOE. I hope that they have gone back and looked at all of the recommendations to move forward with OU4.

My other concern is about how clean is clean for the things that we send out to be recycled.

RESPONSE:

U.S. EPA agrees with your concern regarding the Silo and integrity and the nature of the bentonite cap. U.S. DOE is committed to investigating the integrity of Silos 1 and 2. Also in the interim, before a final treatment option is determined, U.S. DOE is currently investigating the possibility of early waste retrieval from the Silos 1 and 2 in preparation of future treatment and disposal. Future meetings will be held to discuss this option as more information becomes available.

U.S. EPA does not anticipate that vitrification will be pushed from the proof of principal testing. In fact, all parties involved expect a vitrification vendor to come forward and conduct proof of principal testing to try to demonstrate that vitrification is feasible. All of this information is essential to selecting the best technology to treat the Silo materials. Likewise, all information

developed by the various review teams will be shared with all potential vendors and will be incorporated in the revised Feasibility Study.

U.S. EPA agrees that development of a conservation area adjacent to the Fernald facility is consistent with the ultimate future land use of the site. Once remediation is complete the majority of the facility will be available for recreational use. This conservation area project involves obtaining easement rights for property currently not being used for other activities, which is most suitable for such a conservation area and may provide a "buffer zone" to the facility. This approach will not be converting other utilized land to conservation areas, but most likely establishing a conservation area in a current area not be utilized for other purposes. Further details on the conservation area will be submitted by U.S. DOE to U.S. EPA and will be available to stakeholders on November 21, 1997

The recycling work plan is currently available for review in the PEIC. Concerns over recycling methodology and "how clean is clean" are important and should be reiterated to U.S. DOE in comments on the recycling workplan or at future public meetings.

COMMENTOR:

Pam Dunn  
FRESH

COMMENT:

I think DOE needs to specify that \$1 million is over and above the Congress to OMB because that seems to be the only way to get Fourstall's attention and make them aware of what is going on out there. I really would like you all to consider making them have to explain to Congress in their budget request that part of the penalty is for what happened.

I don't have a problem with the conservation area. I would rather see you go ahead with 30 to 100 acres. Additional areas of the site should be committed to conservation resources over and above, in conjunction with the natural resource damages. This makes the most sense since most of the site has to be natural resources anyway.

I want EPA to keep an eye on this feasibility study since they are going to be messing with the environmental impact statement and NEPA.

I am concerned that Silos 1 and 2 are taking a back seat when they are actually worse than Silo 3. Silos 1 and 2 are the leading source of the radon emissions based on John Till's studies. I am concerned that we have to wait with the other silos while Silo 3 will move ahead strictly based on the issue of cost. I realize cost is important but at some point what is best environmentally and to protect human health has got to come ahead of cost. I understand EPA's concern of setting a precedent while doing a ROD amendment or ESD, but I am also concerned about setting a precedent for low-balling a remedy.

I am concerned that the technology is suffering for Silos 1 and 2 and maybe it is not the technology's fault that it has gone over budget. It may be attributable to inefficiencies and ineffectiveness of management. The technology should not suffer for that.

RESPONSE:

Based on the facts and circumstances resolving the dispute and the subsequent settlement, U.S. EPA believes the revised schedules, lessons-learned document, environmental projects and monetary penalty adequately resolve this issue. Although, U.S. DOE is not required to formally request funds other than the monetary penalty from Congress, representatives are most likely aware of the entire settlement.

U.S. EPA agrees that development of a conservation area adjacent to the Fernald facility is consistent with the ultimate future land use of the site. Once remediation is complete the majority of the facility will be available for recreational use. This conservation area project involves obtaining easement rights for property currently not being used for other activities, which is most suitable for such a conservation area and may provide a "buffer zone" to the facility. This approach will not be converting other utilized land to conservation areas, but most likely establishing a conservation area in a current area not being, or likely to ever be, utilized for other purposes. Further details on the conservation area will be submitted by U.S. DOE to U.S. EPA and will be available to stakeholders on November 21, 1997

U.S. EPA is committed to reviewing the revised Silo 1 and 2 Feasibility Study and will require U.S. DOE to highlight any portions of NEPA requirements that have been modified.

It is U.S. EPA's position that Silos 1 and 2 are the highest priority at the site. The proposed action on Silo 3, before action on Silos 1 and 2 is not a shifting of priorities, rather an activity to address the material as soon as possible. Based on past activities and positions by the Independent Review Teams, U.S. EPA, U.S. EPA, OEPA, and other stakeholders, it was agreed that Silo 3 materials were different than Silo 1 and 2 materials and vitrification was not a viable option for the Silo 3 materials. Stakeholders also requested that input from other technology vendors be collected before a final action is taken for Silos 1 and 2. Knowing that would extend the schedule for Silos 1 and 2, U.S. EPA believes it was most prudent to proceed with an action on Silo 3, while other information is being gathered on Silos 1 and 2. U.S. EPA is not setting a precedent as it is not lowering a site-wide priority, but addressing the Silo 3 priority as soon as possible.

U.S. EPA is aware of your concern, as well as that of other stakeholders that a technology such as vitrification may have suffered from previous events and mismanaged activities. This is one of the reasons why U.S. EPA agreed to extend the schedules for Silos 1 and 2 to allow vendors to produce further information regarding various technologies to treat the waste material. This should assure that the most suitable technology is selected for treating the Silo materials.

COMMENTOR:

Mr. Gerald L. Gels  
Health Physics Society, Cincinnati Radiation Society

COMMENT:

In the 8/97 EPA/DOE Dispute Resolution Fact Sheet, it is stated on pg 3,"..., including U.S. DOE's willingness to...put the remediation of OU-4 back on course,..." That implies that OU-4 remediation was ever "on course" in the first place. In addition to some new Fluor staff, the OU-4 management includes the same managers who proposed and/or implemented the application of bentonite to Silos 1 and 2, the application of 5 ft. of sand to those same Silos, and filling the Silo 1 and 2 head space with urethane foam (which would have self-ignited).

I believe the track record is pretty clear. Instead of flower gardens and nature paths, why not do something about bringing in some competent management for this project? With the results of the Till study validated, the potential for negative media coverage is large. The 5 cosmetic "environmental projects" are going to look pretty bland and insipid next to projected cancers.

RESPONSE:

The problems with the Pilot Plant have been well documented and reviewed by internal DOE review teams, the independent review team and stakeholders. One of the noted problems was a disconnect between the design and build phases of the Pilot Plant and associated management integration of the project. As a result, the lessons-learned document was developed to highlight the problems with the Pilot Plant and detail activities that will be undertaken to assure better management of future large-scale remediation projects.

COMMENTOR:

Gary W. Storer  
Crosby Trustee

COMMENT:

I am opposed to the establishment of a conservation district (30-100 acres). I represent a majority of the people within Crosby township. We are not looking for another green space that will not generate tax dollars. Use the money for cleanup to make shipments off site.

As a member of the CRO, I am concerned when I see the conservation area. I had the understanding that a lot of the final land use decisions are going to be made by the CRO. These conservation areas do not generate tax dollars and we are very concerned, since we want to turn this facility into a tax generating facility in the future. I don't think this conservation area is in the best interest of the public or the township.

Establish a cultural resource museum. This could generate income. Also, establish a FEMP museum to reveal the history of the plant for future generations. Mr. John Bradburne is familiar with this request and has indicated his enthusiasm toward this project.

I have several questions about how decisions have been reached on those documents. I also do not agree with the silo priority. The more dangerous silos are being neglected and need to be better prioritized.

RESPONSE:

Development of a conservation area adjacent to the Fernald facility is consistent with the ultimate future land use of the site. Once remediation is complete the majority of the facility will be available for recreational use. This conservation area project involves obtaining easement rights for property currently not being used for other activities, which is most suitable for such a conservation area and may provide a "buffer zone" to the facility. This approach will not be converting other utilized land to conservation areas, but most likely establishing a conservation area in a current area not being, or likely to ever be, utilized for other purposes. Further details on the conservation area will be submitted by U.S. DOE to U.S. EPA and will be available to stakeholders on November 21, 1997.

If it is determined that establishment of a conservation area is not feasible the dispute agreement allows U.S. DOE to propose another project. If another project is recommended all stakeholders will be involved in the decision process and notified at that time of a change in the proposed environmental project.

U.S. EPA agrees that the establishment of a cultural museum for Fernald may be beneficial to the site, as a historical marker for past activities. However, such a project would not ameliorate the impact of the facility on the environment and, therefore, could not be included under the current dispute settlement.

Finally, it is U.S. EPA's position that Silos 1 and 2 are the highest priority at the site. The proposed action on Silo 3 before action on Silos 1 and 2 is not a shifting of priorities, rather an activity to address the material as soon as possible. Based on past activities and positions by the Independent Review Teams, U.S. EPA, U.S. EPA, OEPA, and other stakeholders, it was agreed that Silo 3 materials were different than Silo 1 and 2 materials and vitrification was not a viable option for the Silo 3 materials. Stakeholders also requested that input from other technology vendors be collected before a final action is taken for Silos 1 and 2. Knowing that would extend the schedule for Silos 1 and 2, U.S. EPA believes it was most prudent to proceed with an action on Silo 3, while other information is being gathered on Silos 1 and 2.

As a result, Silos 1, 2 and 3 are being addressed as separate projects with separate schedules. The technical complexities of processing Silos 1&2 material results in a schedule where actual processing occurs at a date later than that for Silo 3. Silo 3 material should be easier to process, so the start-date for processing is sooner. The Silo 1&2 project is indeed the highest priority at Fernald, but the project requires more development time prior to actual material processing.

Furthermore, U.S. DOE is committed to investigating the integrity of Silos 1 and 2. Also in the interim, before a final treatment option is determined, U.S. DOE is investigating the possibility of early waste retrieval from the Silos 1 and 2 in preparation of future treatment and disposal.

COMMENTOR:Bob Tabor  
COMMENT:

As far as I am concerned DOE is dragging their feet on some of the decisions that we need to make for some of the Silos projects. Maybe someone or some other Agency can influence Mr. Alm's boys to make some decisions on Silo 3 relative to the RFP and their review.

I guess my concern deals with the privatization of this particular project. It requires approval at the end of the road. What causes privatization and some of the dollar savings that have been earmarked? What are we benefitting or saving by going and privatizing? If they don't get off their dead duff they are going to eat up twice that amount of savings in administrative costs. So what in the world is the benefit of doing any of this or having them involved in that process? I need some people with some clout to tell those folks that we don't like that down here.

RESPONSE:

U.S. EPA and other stakeholders are aware of the existing holdups of the Silo 3 draft RFP and the various projects requiring privatization funding. U.S. EPA has expressed its concern and informed U.S. DOE that delays in initiating these projects may exist in larger remediation milestones and lead to future disputes. Therefore, U.S. DOE is aware of the situation and U.S. EPA and all other stakeholders need to continue to monitor the situation.

COMMENTOR

Edwa Yocum  
FRESH

COMMENT

I believe the conservation area should be onsite, and the research grants and wild bird and flower habitat monies be given to the recycling program.

A conservation area offsite would be taking land use away from Crosby Township and the community.

I would also like to ditto all of Pam Dunn's , Vicki Dastillung's and Lisa Crawford's comments as mine.

RESPONSE

Development of a conservation area adjacent to the Fernald facility is consistent with the ultimate future land use of the site. Once remediation is complete the majority of the facility will be available for recreational use. This conservation area project involves obtaining easement rights for property currently not being used for other activities, which is most suitable for such a conservation area and may provide a "buffer zone" to the facility. This approach will not be converting other utilized land to conservation areas, but most likely establishing a conservation area in a current area not be utilized for other purposes. Further details on the conservation area will be submitted by U.S. DOE to U.S. EPA and will be available to stakeholders on November 21, 1997.

If it is determined that establishment of a conservation area or some other environmental project is not feasible the dispute agreement allows U.S. DOE to propose another project. If another project is recommended all stakeholders will be involved in the decision process and notified at that time of a change in the proposed environmental project.

See responses to Lisa Crawford, Pam Dunn, and Vicky Dastillung's comments to address your dittoed concerns.