Response I-1: The “holes” in the Long-Term Stewardship (LTS) Plan referred to details of stewardship activities that have not been resolved, such as institutional controls for the Ground Water Operable Unit at the site and the restrictive easements and other legal instruments associated with institutional controls. Radioactive materials and other wastes (e.g. asbestos) have been remediated and encapsulated in the disposal cell in accordance with approved Records of Decision that were based on approved health and environmental risk assessments. Because there are no longer any activities at the site that could pose a risk to the students and faculty at the school, the intent and purpose of the professional consultant services for the school are fulfilled and are no longer considered necessary.
Response I-2: Air monitoring activities during the remediation and cell construction activities indicated that the high school and other locations near the site were not exposed to airborne hazards (radioactive air particulates, radon gas or asbestos) from the site activities. With the cell completed, there is no longer a source of these airborne hazards; therefore, air monitoring is no longer required. DOE provided written notice to FHSD, as well as other critical receptors, prior to the discontinuation of air monitoring in December 2000. The LTS Plan contains a provision for monitoring for radon in the unlikely event that the cell cover is breached and the radioactive contents are exposed to the air.

Contaminated ground water remains at the site, and DOE will continue to sample a network of monitor wells and springs. The LTS Plan includes maps showing the monitor well locations, sampling frequency, and the constituents that continue to be analyzed, and will incorporate any additional monitoring requirements stipulated by the pending Ground Water Operable Unit Record of Decision. Sampling will continue until the requirements of the Records of Decision are met.

Response I-3: DOE continues to honor our long standing commitment to ensure protectiveness of the students and faculty at the Francis Howell High School. DOE focused an intense 14 year monitoring effort at a dedicated monitoring location adjacent to the high school in order to assure that any impact due to our remedial actions could be rapidly assessed and corrective actions could be taken. DOE fulfilled its commitment that the high school would never be exposed to above-background concentrations of site contaminants. This commitment also included monies for an independent consultant to review all the data.

The school district is on the contact list for distribution of the annual and 5-year review reports. Documents pertaining to site remediation and stewardship will be available at the site Interpretive Center and at the Middendorf-Kredell branch of the St. Charles City-County Library System. These documents and other site information, including all historical and current ground water and surface water quality data, will be available for public access on the LTSM Program website.
(http://www.gjo.doe.gov/programs/ltsm). Annual public meetings will be held by DOE to discuss site activities and public concerns.

Sincerely,

Dr. Dan O’Donnell
Superintendent

DEO/vf

Cc:  U.S. Representative Todd Akin
     U.S. Senator Jean Carnahan
     U.S. Senator Christopher Bond