

0053736

Hanford Site 100 Area Burial Grounds Public Meeting Hood River Inn - Mountainview Room June 14, 2000

Public Comment Form

(Use back of sheet for additional comments)

Je need one
Consent
with
9931300
to public
burial
grounds

1. Please put record / comments from 1999 100 Area Risk Workshop, (Portland, Hood River, Kennewick) into Administrative Record for all 100 Area and 300 Area R.O. Dis; and, utilize for purposes of defining Maximum Reasonable Exposure Scenarios ^(MRES) pursuant to M.T.C.A.
2. Utilize public input on MRES to define exposure parameters and assumptions for risk assessments: I.e., input on fish consumption from Tables showed reasonable consumption expectation should be > 10 times M.T.C.A. default value (approx 20kg/yr). Cf: Record and Proposed Plan based on 5kg/year.
3. a) Must combine risks from direct exposure (pres. by Record with appropriate exposure assumptions pursuant to MRES) with ingestion, inhalation, etc... pathways using M.T.C.A. for radionuclide risk.
b) Total carcinogen risk must sum radionuclides with other carcinogens. Remedial Action levels must meet M.T.C.A. for total carcinogen risk
c) Should utilize new data from Risk Assessment Corp and Rocky Flats Soil Action Level Oversight Panel regarding exposure assumptions, flaws in Record model and its default exposure assumptions, the need to remediate based on fire as a exposure path.
4. USDDE's FES is legally inadequate for failure to apply M.T.C.A. and public input as to MRES, and reliance on containment. OVER

Submitted by: Gerald Pollet, Heart of America Northwest
Address _____

Return form by June 20 to:
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4. Cont'd

To show seriousness of FFS and its use in place of NEPA and SEPA, EPA and Ecology should formally reject the FFS and determine that its submission did not meet the applicable TPA Milestone. Penalties should be levied.

The flaws in the FFS are serious and represent willful violations; i.e. shabby analyses on MPES of 7 days per year of camp; and, 3)

5. Careful examination of migration of D-U238 and other 300 Area Burial Grounds / Ponds' wastes is necessary to determine if metals / U / chemicals migrate in excess of minimal migration permitted for 100 Area Burial Grounds. Also use evidence of U migration at other sites to compare with model.
6. It is not legal, pursuant to MICA, to utilize an industrial cleanup level for 300 Area burial grounds and ponds (G18-4, N's Ponds) which are outside of the boundary of the traditional industrial use zone, and which adjacent communities with a surface water body, and are not "zoned" industrial (i.e. outside fence of 300 Area). Esp. 300 FF.
 - a) Must do full characterization of "U" barrels and all other wastes found, including unknown chemicals placed in overpacks. Please explain 10m/h levels shown and why workers were not informed of risks > contact alpha and beta.
7. Both the 100 Areas and 300 Areas sites must have fencing and clear signage warning of the health hazard from radiation and chemical waste contamination to prevent exposure from the River and from walking along the bank / trails. "No Trespassing" signs are inadequate. So.1 must not be stayed outside of Exclusion Zone with Fencing.
8. Site by site analysis without cumulative impact assessment from same facility is entirely inappropriate

Please Send Response. Please Consider Pts. 5 & 6th for 300 FF? as well.