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Dear Mr. Faulk:

## EDMC

These comments are in response to a request for public input on the Focused Feasibility Study and Proposed Plan for the 100 Area burial grounds. Thank you for the opportunity to share my thoughts.

First, I would like to respond to the concept of a streamlined approach for cleanup the 100 area. Lumping all of the burial grounds under one planning document was a very forward thinking process. I am hopeful that we will see a much more accelerated schedule for remediation of all of the sites using this strategy.

I want to see this framework utilized in coordinating the Science and Technology needs for characterization and remediation of these burial grounds. Concurrently, budgetary needs to address this cleanup should be quantified iteratively such that like waste sites are aligned back-to-back for remediation. This could assure the continuity of trained workers who will move progressively through the work to be remediated without "down time" brought on by poor coordination of effort or lack of budget.

Top priority, for me, is the path of Remove, Treat, Dispose for these burial sites. Bounded by milestones through the TPA process, the public can have assurance that the work will meet CERCLA, RCRA, MTCA, and NEPA law.

The potential for future catastrophic flooding seems low. I believe, though, that we have the moral obligation to mitigate, to the best technology available, all sites within the 100 area which could potentially impact future generations of people, animals and aquatic and plant life in this region either because of flooding or release through other unexpected events.

Though I am cognizant of budgetary limitations and the reality of the unretrievability of some of the wastes in the 100 area, I do not like the idea of leaving in place any waste which has the potential of impacting the groundwater and thus the Columbia River in the future. The goal should be retrieval, containment and management of the wastes for as long as necessary to protect human health and the environment.

I cannot underscore enough the importance of setting points of compliance. But setting defensible and sustainable points of compliance is an exercise in futility without adequate characterization. Although the process of mining historical data has had some limited success, I'm not sure that it is worth the payoff over the long term. I don't believe that we have the luxury of time anymore to wait for all documents to be declassified. I think that there is considerable conflict over the reliability and robustness of old data. I believe that we need to rethink this idea of "balance" between data mining and the quest for new data and error on the side of a much

more extensive characterization program. Gross errors in analysis will occur when you assume that old data can be "fit" into new models for analysis when very different calibrations have been used..

Lastly, I am reflecting on a document I saw many years ago now - called "The Lost Sites". It chronicled narratives from workers who remembered "dumping" wastes but could not remember where. It has become common knowledge that there are sets of satellite photographs- from the CIA, of the Hanford site and photographs held by the Department of Transportation. Possibly these should be utilized to further determine the potential for other burial sites?

I commend the agencies for rising to the belief that we must clean up the 100 area to a level which will allow the release of this land for unrestricted use. It is the right thing to do.

Sincerely,

*Shelley Cimon*

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