

Davis South Campus Superfund Oversight Committee
Rt. 2 Box 2879
Davis, CA 95616
Ph. 530 753-9446-Fax 530 753-8220
E-mail Jroth@aol.com
Web site <http://members.aol/dscsoc/dscsoc.htm>

December 14, 2000

Steven Livingstone
Project Manager
Office of Long Term Stewardship (EM-51)
US Department of Energy
P.O. Box 45079
Washington, D.C. 20026-5079

Dear Mr. Livingstone,

DSCSOC wishes to thank the Department of Energy for the opportunity to comment on DOE's "Draft Long-Term Environmental Stewardship Study." DSCSOC is the US EPA TAG group for the UCD/DOE LEHR Superfund site on the UC Davis Campus.

DSCSOC submits the following comments:

- ❑ **The highest priority should be placed on selecting remedies that protect the long-term safety and health of the community and the environment surrounding the DOE facility. All aspects of establishing, maintaining and funding long-term stewardship should be considered during the remedy selection process that is part of the cleanup. Whenever possible, DOE facilities should be cleaned up to the level that allows unrestricted use and avoids the need for long-term stewardship. Where cleanup to such a level is not practical due to current technical constraints, DOE should include in the final remedy decisions documents details regarding the stewardship plan and funding.**
- ❑ **DOE should develop a program to look for solutions that would minimize or eliminate the need for long-term stewardship. If DOE leaves hazardous chemical contaminants in place, DOE should provide funding in its final remedy decisions to monitor these contaminants and to continue researching for a remedial treatment that destroys these contaminants to avoid the need for long-term stewardship.**
- ❑ **DOE should develop a mechanism including funding where local communities will be involved in long-term stewardship decisions. The**

communities should be involved in initial long-term stewardship activities and any changes to those activities that may occur as a result of re-evaluation or modification of the remedy. The community should be involved in periodic reviews, such as the five-year review cycle under CERCLA and performance of the long-term stewardship activities. Additionally, independent technical expertise should be provided to communities to assist them in evaluating the many technical documents that form the basis for key decisions.

- DOE should develop Contingency Plans at the time cleanup decisions are made. DOE should plan for uncertainty and fallibility of some aspects of its long-term stewardship program**
- DOE should commit funding for long-term stewardship. When the final remedy is agreed upon at a site, full funding for stewardship activities should be defined, including the role of the parties who will manage the funding and the funding sources. The local community should have a role in managing the funds and in defining any future investigation, evaluations and testing at the site.**
- Periodically re-evaluate the remedy. This re-evaluation should include changes in health/environmental standards associated with contaminants that are left in place, changes in technology that were not available at the time when initial cleanup decisions were made but if implemented would eliminate the need for long-term stewardship activities, and performance of the remedy in place. It should include funding to investigate and remediate contamination in place not previously considered to be a threat.**
- DOE should provide a reliable, up-to-date record of the management at a facility that is fully accessible to the community.**
- DOE should develop a policy and regulations on property transfers where DOE is responsible for perpetuity unless the new owner has altered the property, violated a legal deed restriction or contaminates the environment.**

Sincerely,

Julie Roth, Ex. Dir.