

Key DSCSOC Issues of Concern on the
DOE-Proposed Plan for Remediation of
DOE Areas at the UCD DOE LEHR Superfund Site

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Overall, the DOE proposed plan for remediation of DOE areas of the LEHR Superfund site addresses the near term control of conventional pollutants.

- As discussed in DSCSOC comments on this plan, there are several potential technical problems with this plan. These comments are on the DSCSOC website, www.gfredlee.com/DSCSOC/dscsoc.htm in Dr. Lee's reports.

The key issue to DSCSOC addressing DSCSOC concerns is how well the proposed plan is implemented during the time that residual wastes left in the soil at the LEHR site will be a threat to public health and the environment. This concern over the adequacy of implementation exists at the time of the Record of Decision (ROD) is signed and over the very long period of time during which the residual known pollutants, as well as yet-unrecognized pollutants, left in the soil will be a threat to pollute offsite waters. There could readily be residual pollutants in LEHR site that have not thus far been identified.

- For planning purposed this period of time should be considered to be forever.
- Of particular concern is the adequacy of monitoring of groundwaters for offsite migration to groundwaters under adjacent properties.

Another issue of concern is the adequacy of implementation of restrictions of future land use at the LEHR site to prevent buried pollutants' being brought to the surface soils and thereby become a presently unconsidered threat to public health and the environment.

- Some of the pollutants that are proposed to be left at the site buried under surface soils will be a threat essentially forever.
- At sometime in the future will the soils at LEHR site be brought to the surface by future construction activities that violate the restrictions on land use activities at the site.
- There will be need for strong, independent oversight of LEHR site activities forever.
- It should not be left to DOE, UCD, US EPA, DTSC, DPH, CVRWQCB to police future LEHR site activities to conform to land-use restrictions adopted in the ROD. There is no assurance that these agencies will continue to be funded or will implement land use/activity restrictions essentially forever, as long as there are waste residues in the LEHR site subsoils that are a threat to public health and/or the environment. Consideration should be given to funding independent site oversight to ensure that the public is kept informed on the adequacy of protection of public health and the environment.

The DSCSOC website provides detailed discussion of these issues. The URL for this site is being changed to www.gfredlee.com/DSCSOC/dscsoc.htm