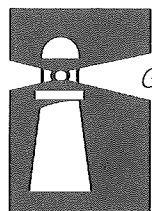


LAKE
COUNTY



Guiding Your Health

**GENERAL
HEALTH
DISTRICT**

August 15, 2005

U.S. Army Corps of Engineers
Buffalo District
FUSRAP Information Center
1776 Niagara St.
Buffalo, NY 14207

Re: Comments regarding the Final Proposed Plan for Remediation of the Painesville Site, Fairport Nursery Rd., Painesville, Ohio

Dear Sir or Madam:

The Lake County General Health District would like to take this opportunity to comment on the above referenced plan. Our comments are as follows:

- 1) Throughout the document the report references a "likely continued industrial use." Please be advised that the Painesville Works Site is adjacent to this site. The Painesville Works Site is a hazardous waste site currently in the feasibility and preferred plan stage for several operable units. The Ohio EPA Proposed Preferred Plans make reference to the potential for residential and recreational end uses on several operable units. There have been significant changes since the completion of the USACE RIFS in 2003. The Lake County General Health District strongly suggests that USACE contact Teri Phillips, Ohio EPA site coordinator of the Painesville Works Site at 330-425-9171. In addition it would be advisable to contact Hemisphere Corporation at 216-464-4105, the redevelopment company also involved with that site. If the adjacent Painesville Works Site has areas of residential end use, how will this affect the USACE proposed remediation plan? Will the risk assessment be re-evaluated?
- 2) The Oak Ridge National Laboratory radiological surveys of 1988, 1990 and 1991 indicated the residual radioactivity present at the site was above guidelines for unrestricted use. What risks did and does the site pose for the former Uniroyal employees and what are the risks to the Lonza now Twin Rivers employees?
- 3) The plan references the removal of approximately 1,300 cubic yards of radiologically contaminated soil based on an Action memorandum (1998). The project was suspended due to the discovery that the extent of contamination was greater than anticipated in the Action Memorandum. The Action Memorandum was based on the Characterization Report completed by Bechtel National, Argonne National and Science Applications International. It is rather disconcerting that the USACE selected an alternative from what should have been an extensive, thorough survey that was either inaccurate or was underestimated. What assurances does the public have that the planned remediation will thoroughly address the extent of the contamination in this attempt?

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Painesville, Ohio 44077

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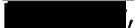
██████████ R.S., M.P.H.
Health Commissioner

- 4) The plan references the extensive storm water drainage system present on site. Please be advised that the drainage system on the Painesville site is connected to the storm water drainage system from Twin Rivers. Although much of the site is still covered with concrete and asphalt, all the buildings have been demolished except the main office building. To our knowledge, the storm drain system is open to the elements and none of the physical components of the storm water system have been sealed. Also be aware that Twin Rivers also discharges non-contact process cooling water to that storm water discharge system. Has the storm water discharge to the Grand River been surveyed for radiological contamination? If not, then it should be.
- 5) In the Human Health Risk Assessment summary there is a reference to total excess cancer risk. Does this risk represent the additive risk from each radionuclide present at each area?
- 6) There is reference in the scope and role section of the plan that the remediation will only address constituents of concern related to Atomic Energy Commission activities. Has USACE contacted the Ohio EPA concerning the potential hazardous wastes that may be commingled with the radiological waste? The Ohio EPA site coordinator for this hazardous waste site at the current time is Kurt Kollar.
- 7) The plan on page 31 clearly indicates that with the implementation of Alternative 3, there will be environmental risks to on-site workers, the community and the environment. Does the term environmental risk translate to a human health risk? Specifically, what type of environmental and engineering controls will be implemented to minimize risk to the public, the site workers, the Twin Rivers employees and the environment during the remediation? How much radiological contamination can be expected in the dust and storm water? How will dust control and storm water be handled at the site during remediation?

In closing, the Health District staff would like to meet the USACE representatives responsible for the oversight of this site to discuss the specifics of the remediation well in advance of the beginning of the project. We want a clear understanding of the process and sufficient knowledge to handle questions from the public once remediation begins. Please take these comments and questions into consideration as we look forward to your response. Please contact me at 440-350-2543 to schedule a meeting in the near future.

Sincerely,
Lake County General Health District


Supervisor of Liquid/Solid Waste & Water Supply Programs

Cc/ , USACE
Painesville Township Trustees
, Ohio EPA, Northeast District Office
, Ohio EPA, Northeast District Office