Department of Energy

Ohio Field Office
P.O. Box 3020
Miamisburg, Ohio 45343-3020

GUIDING PRINCIPLES
for
Long Term Stewardship

It is the responsibility of the U.S. Department of Energy (DOE) Ohio Field Office (OH) to provide for a smooth transition from cleanup to long term stewardship (LTS) through technical, financial and managerial planning. The goal of LTS is to ensure that the level of human and environmental health and safety, achieved by the selected remedies, is maintained. Recognizing that the "cleanup" goal in many cases is to reduce and control but not to entirely eliminate risk and cost, the cleanup criteria and final land use for each OH project will differ. Some projects will have more complex and costly LTS responsibilities than others. However, during the development of LTS Plans for each project, OH personnel will embrace the following Guiding Principles:

- **Stakeholder and Regulator Involvement:** LTS Plans will be designed to meet the needs of the affected communities by ensuring the protection of worker, public, and environmental health and safety. Educating the public on the design of, and purpose behind, the remedies and associated LTS requirements is critical to the successful completion of the site closure process. LTS Plans will be established through collaborative discussions with all involved stakeholders and will be developed as required by statutory and Departmental requirements and site-specific mission priorities. These plans will also be consistent, to the maximum extent possible, with consensus guidance offered by national-level advisory bodies such as the Environmental Management Advisory Board (EMAB) and the State and Tribal Government Working Group (STGWG).

- **Institutional Controls:** Institutional Controls (IC) fall into two general categories, Active and Passive. Active IC's require relatively frequent or continuous activities, such as monitoring the performance of an onsite disposal facility or a groundwater pump-and-treat system. Passive IC's could include Deed Restrictions and maintaining public records on historical operations, cleanup activities, and post-closure surveillance and maintenance activities. Given that the final step in the cleanup process is making sure that the administrative controls and use restrictions are not lost over time, LTS commitments for "knowledge/data management" may, in fact, be one of the Department's most challenging obligations. IC's chosen should be appropriate for the specific OH Project. Successful implementation of IC's will require close coordination and cooperation (essentially, a "layered approach") between Federal Agencies as well as Tribal, State and local governments, and future land owners or custodians.

- **Funding:** The cost-benefit of any potential LTS action should be evaluated at the time of remedy selection. If prolonged and costly long term controls will be required of the Federal government following a remedy, this should be compared to the cost of additional cleanup to avoid long term controls altogether. This is not to say that life-cycle cost, alone, will be the deciding factor. However, as a general rule, the DOE-OH will seek the most cost-effective and credible ways to carry out its LTS responsibilities. If LTS considerations are built into the cleanup decision-making process up-front, Congressional funding requirements for same will be easier to define, request and manage.

- **Review of Remedy:** Each LTS Plan should allow for a mechanism to periodically review the effectiveness of the chosen remedy and make revisions. Technologies will improve over time, creating opportunities for improved efficiencies in both the cleanup and LTS phases of a closure project. Review cycles for the remedies should be based on the regulatory and/or technical (e.g., accepted risk exposure scenarios) requirements. For example, CERCLA requires a review every five years (or less).

- **Technological Opportunities:** LTS strategies should be designed to take advantage of, to the maximum extent possible, proven or yet-to-be-developed technologies (e.g., remote sensing capabilities), in lieu of a continuous DOE presence onsite. Strategies should not require labor-intensive efforts to implement if an affordable and proven technology exists, or could be developed, to accomplish the strategy. These strategies must also be designed to meet stakeholder requirements (e.g., for unobtrusive and real-time monitoring) as well as regulatory requirements.

- **Pooling Resources:** OH project sites are to work with all other OH sites in the development of LTS Plans. Lessons Learned and technology improvements realized at another OH project site or facility in the DOE complex (e.g., UMTRCA sites) should be considered during the development of LTS strategies at individual OH sites. Resources should also be pooled among OH project sites to meet any long-term commitments. Finally, to ensure consistency and integration throughout the OH sites, no commitments of Federal resources as long term controls may be made until approval has been received from the OH Manager and Legal Counsel.

The above Guiding Principles are not meant to be an all-inclusive list. Nor are they meant to be static in nature. As the Department refines its goals and expectations for LTS activities across the complex, the OH may decide to re-visit the above items. However, in the interim, these Guiding Principles build the foundation for site-specific LTS activities at the project sites that comprise the OH. Any questions on the above Guiding Principles should be directed to me at (937) 865-3977.

Signed this 27th day of March, 2000 by Susan R. Brechbill

Susan R. Brechbill, Manager