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G-000-1002.10

REVISED COMMUNITY RELATIONS PLAN

06/03/92

**USEPA/DOE-FN
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LETTER**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
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CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:

JUN 03 1992

Mr. Jack R. Craig
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

HRE-8J

RE: Revised Community Relations
Plan

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the revised Community Relations Plan.

U.S. EPA hereby disapproves the revised Plan pending incorporation of the attached comments.

Please contact me at (312/FTS) 886-0992 if you have any questions.

Sincerely,

James A. Saric
Remedial Project Manager

Enclosure

cc: Graham Mitchell, OEPA-SWDO
Pat Whitfield, U.S. DOE-HDQ
Dennis Carr, WMCO

(Craig)
ACTION RESPONSE
to F-118?
(11/10)

U.S. EPA COMMENTS ON THE FEMP COMMUNITY RELATIONS PLAN

Section 1.1: The Community Relations Plan (CRP) is not only to guide community relations activities but also to establish and encourage communication between the surrounding communities and the governmental agencies managing the Superfund project. The goal of the CRP is also to involve residents and local officials in the investigation and clean up process.

Section 1.2.2: A 1992 schedule of community roundtables and site tours should be included.

Section 2.6: State where the Administrative Record is available for public review.

Section 3.4, page 8, paragraph 2: This paragraph should have a heading "Information".

Section 4.0: "CERCLA/SARA" should be replaced with "Superfund" for consistency throughout the document.

Table 4-2: Fact Sheets, Workshops, Press Releases, and Public Notices should be specified more clearly, rather than "as needed".

Appendix B, page 2: The following addresses should read:

James Saric
Remedial Project Manager (312) 886-0992
U.S. EPA - Region V (HRE-8J) Fax (312) 353-4788
77 W. Jackson BLVD.
Chicago, IL 60604

Cheryl Allen
Superfund Community Relations Coordinator (312) 353-6196
U.S. EPA - Region V (P-19J) Fax (312) 353-1155
77 W. Jackson BLVD.
Chicago, IL 60604

TECHNICAL REVIEW COMMENTS**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT (FEMP)
REVISED COMMUNITY RELATIONS PLAN (CRP)****General Comments**

1. The foreword and introduction state that the original CRP was prepared in 1990 and that community assessments were held in 1986 and 1989. The foreword also mentions an "updated revision." The term "updated revision" is confusing. If the original CRP was based on 1986 and 1989 interviews and if this CRP is a revision to the 1990 document, then this CRP should be referred to as the "final CRP" throughout.
2. CRPs should generally be written to a lay audience. This document, however, appears to have been written to a technical audience. The average person within the site community should be able to read the CRP with ease and get a good understanding of the site history, community concerns and involvement, and planned community relations activities. This document should be rewritten for a lay audience.
3. Various agencies are mentioned throughout the text. The role of each agency is not clear and should be clarified.
4. At first use of an acronym, the acronym should be defined. It should appear in parentheses immediately following the definition (for example, U.S. Environmental Protection Agency (EPA)). Throughout the document, some acronyms are used and then defined in subsequent sections; others are used without any definition. A global search should be conducted to find and correct these problems.
5. Throughout the document, when the acronym "FEMP" is used, the word "the" generally should not precede it. For example, Section 1.0, paragraph 2, line 2, says "...studies at the FEMP." This line should read "...studies at FEMP."

Specific Comments

6. The date on the title page should be changed from January 1992 to April 1992.
7. The foreword states that this document "represents an updated revision to the August 1990 CRP" This is confusing. This sentence needs to be rewritten or the document retitled, as discussed in general comment No. 1 above.
8. Lists of tables and figures should be added to the table of contents.
9. Section 1.1, paragraph 4, states that community assessments were held, but it does not say exactly who was consulted or interviewed (such as local officials and residents) and who conducted the assessments. Also, "community assessment" should be defined (see Section 3,

- page 6). What, other than interviews, is entailed in a community assessment? These matters should be made clear.
10. Section 1.2 should be deleted or incorporated elsewhere. This section discusses community issues and concerns, as well as community relations activities. This section is (1) confusing, because it is out of place (the information in this section belongs in Sections 3 and 4), and (2) redundant, because it discusses information that is discussed elsewhere in the document. Subsequent sections should be renumbered to reflect the deletion of Section 1.2.
 11. In Section 1, page 6 of 7, the paragraph that starts with "Section 1.0, Overview" should be deleted, because this reference is to a previous section.
 12. In Section 1, page 6 of 7, line 2 of the paragraph that starts "Section 4.0, RI/FS Community Relations Program ..." should say "suggested community relations techniques to be used in the community relations program" instead of "techniques utilized in the community relations program." The CRP should outline the suggested method for conducting community relations activities, not list general activities that are normally conducted in community relations programs.
 13. In Section 1, page 6 of 7, "Plan Organization," under Appendices, the Appendix A items should read "Location and Hours of FEMP Reading Room and Administrative Record Files," to be consistent with the wording in ~~the~~ table of contents and in the appendix.
 14. Section 2, page 5 of 17, paragraph 2, should state who was responsible ~~for opening~~ the reading rooms and why they were closed. This paragraph also states that residents filed a class action suit against National Lead of Ohio (NLO). Why the suit was filed is unclear and should be explained.
 15. Section 2, page 5 of 17, paragraph 3, states that public interest was renewed in 1986. However, the CRP never states that public interest had declined. This matter needs to be explained.
 16. Section 2, page 6 of 17, paragraph 2, states that the Resource Conservation and Recovery Act (RCRA) is "a federal regulation designed to control the use and disposal of hazardous chemicals." This definition is inaccurate and needs to be rewritten. RCRA is a statute which, through its implementing regulations, establishes a program to ensure the proper management of hazardous waste from its generation through its ultimate disposal or destruction.
 17. Section 2, page 7 of 17, paragraph 1, states that Senator John Glenn urged DOE to employ current plant workers for "that work." However, the exact nature of the work is not clear. This matter needs to be clarified.
 18. In Section 2, page 8 of 17, under the description of Operable Unit 1, this unit is called the "waste pit area." However, the term "waste storage area" is used to refer to the unit in the same paragraph. The

terminology should be consistent. Table 2-1 and Figure 2.3 should reflect this change.

19. Section 2 states that the components of each operable unit are identified in Table 2-1; however, Table 2-1 is entitled "FEMP Operable Units." To be accurate, this title should be changed to "FEMP Operable Unit Components." Also, Table 2-1 mentions the comprehensive site-wide operable unit; however, this unit is not mentioned in Section 2.
20. In Section 2, page 11 of 17, the description of operable unit 5 should match the descriptions in Table 2-1 and Figure 2.3. The current description is unclear.
21. Section 2, page 11 of 17, first full paragraph, line one, refers to the Amended Consent Agreement. It should be clarified that this reference is to the 1991 Amended Consent Agreement.

The same paragraph states that a "baseline risk assessment" is being conducted and then defines a "risk assessment." Readers of the CRP might question the difference between a baseline risk assessment and a general risk assessment. This difference should be clarified.

22. Section 2, page 11 of 17, last paragraph, talks about EPA receiving comments from the state and the community. The text should clarify the subject of these comments. As mentioned in general comment No. 2, the text should be revised so that a lay audience can understand it. The text should clearly state that EPA will receive comments on the proposed plan, if that is what is intended.
23. The first sentence on page 12 of 17, Section 2, needs to be simplified for a lay audience.
24. Section 2, page 13 of 17, paragraph 2, discusses "non-time critical removal actions" and "time-critical removal actions" and is thus very confusing. This paragraph needs to be rewritten for clarity.
25. The last sentence on page 13 of 17, Section 2, states that a public comment period was held but does not state the nature of the comments received during the comment period nor how comments were addressed. This information should be provided.
26. Section 2, page 14 of 17, discusses removal action 4. This discussion (bullet item number 2) contains language that is very technical. Again, this language should not be used in a CRP. This discussion should be simplified.

This paragraph should also include an explanation of the activities conducted over the past two years. As it is written, no activity has occurred since 1990.

27. Section 2, page 15 of 17, states that the administrative record (AR) is an official file of documents supporting decisions made and that it will be maintained by DOE and made available to the public in a timely manner. According to EPA guidance on compiling ARs, an AR should

contain information that EPA either considered or relied upon in selecting a remedy for a Superfund site. Therefore, documents contained in an AR do not necessarily support decisions made because the purpose of an AR is not to provide supporting documentation for decisions. This paragraph needs to be revised to accurately reflect EPA policy.

Also, the text implies that the AR is not currently being maintained and that it is not currently available to the public. According to EPA guidance, ARs should be compiled and updated on an ongoing basis as relevant information becomes available. This section should be rewritten to be made consistent with EPA guidance. The revised section should state that the AR is available to the public and is being maintained by a specific party and is available to the public.

28. Section 3, page 5 of 11, refers to the "Fernald Project Cleanup Report." It appears that this is an error and that the correct title is the "Fernald Project Update." No other reference is made in the document to the "Fernald Project Cleanup Report."
29. In Section 3, page 6 of 11, the first bulleted item states that an open house was held and that technical remedial investigation and feasibility study (RI/FS) staff answered community questions. The text should clarify exactly who held the open house and who answered questions.
30. In Section 3, page 6 of 11, the fourth bulleted item states that a series of community roundtables was initiated to discuss issues with area residents. The text should clarify exactly who initiated and held these roundtables.
31. Section 3, page 6 of 11, defines community assessment. This definition should appear earlier in the text.
32. Section 3, page 8 of 11, paragraph 6, line 4, states, "Many interviewees attributed the negative impacts on property values to concern about potential health effects that nearby residents might suffer." This statement is confusing and should be rewritten more simply and concisely.
33. Section 3, page 11 of 11, paragraph 4, refers to the "FMPC Update" in the discussion about publications. "FMPC Update" should be changed to "Fernald Project Update."
34. In Section 4, three program objectives are listed. Suggestions for meeting the third objective are given in Section 4.4. However, no suggestions are clearly presented for meeting the other two objectives. Either sections should be added to address the other two objectives, or an explanation should be given for not including this information.
35. In Appendix A, the location of the Public Environmental Information Center (PEIC) is listed as Harrison, Ohio. However, elsewhere in the document, the PEIC is listed as being in Ross, Ohio. This inconsistency needs to be corrected.



Also in Appendix A, the address provided for EPA Region 5 is incorrect. The correct street address and mail code should appear. The 1-800 telephone number provided should be checked for accuracy.

36. In Appendix B, the address and mail codes for the EPA contacts should be corrected. The correction should also include the name of the current EPA community relations coordinator.

Appendix B, page 2 of 3, lists several Ohio EPA contact persons but does not include telephone numbers for these contacts. Telephone numbers should be provided.