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VOLUME III OF THE WORK PLAN COMMUNITY RELATIONS PLAN REMEDIAL INVESTIGATION/FEASIBILITY STUDY AND REMOVAL ACTIONS AT THE U. S. DEPARTMENT OF ENERGY FEED MATERIALS

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VOLUME III
of the
Work Plan

COMMUNITY RELATIONS PLAN

REMEDIAL INVESTIGATION/
FEASIBILITY STUDY
and
REMOVAL ACTIONS
at the
U.S. DEPARTMENT OF ENERGY
FEED MATERIALS PRODUCTION CENTER
FERNALD, OHIO

Prepared by:

U.S. DEPARTMENT OF ENERGY
OAK RIDGE OPERATIONS

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FOREWORD

This document, Volume III: Community Relations Plan (CRP), is part of the Work Plan and supporting documents for the Remedial Investigation and Feasibility Study (RI/FS) and Removal Actions being conducted for the U.S. Department of Energy Feed Materials Production Center located near Fernald, Ohio. This issuance represents a complete revision to any previous Community Relations Plans, as a portion of the overall RI/FS Work Plan. It supercedes all prior issuances.

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APPENDICES:

LIST OF ACRONYMS

AEC	Atomic Energy Commission
ASI	Advanced Sciences, Inc.
CDC	Centers for Disease Control
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CRP	Community Relations Plan
EE/CA	Engineering Evaluation/Cost Analysis
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
ERDA	Energy Research and Development Administration
FCA	Federal Compliance Agreement
FFCA	Federal Facilities Compliance Agreement
FMPC	Feed Materials Production Center
FRESH	Fernald Residents for Environment, Safety and Health
GAP	Government Accountability Project
IT	International Technology Corporation
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NEPA	National Environmental Policy Act
NIOSH	National Institute for Occupational Safety & Health
NLO	National Lead of Ohio, Inc.
NOA	Notice of Availability
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NRDC	National Resources Defense Council
OEPA	Ohio Environmental Protection Agency
ORAU	Oak Ridge Associated Universities
OSHA	Occupational Health & Safety Act
PCB	polychlorinated biphenyls
RCRA	Resource Conservation and Recovery Act
RI/FS	Remedial Investigation and Feasibility Study
ROD	Record of Decision
SARA	Superfund Amendments and Reauthorization Act
SPEERA	Secretary's Panel for the Evaluation of Epidemiological Research Activities
U.S. DOE	U.S. Department of Energy
U.S. EPA	United States Environmental Protection Agency
USGS	U.S. Geological Survey
WMCO	Westinghouse Materials Company of Ohio

1.0 OVERVIEW

1.1 Introduction

This comprehensive Community Relations Plan (CRP) has been prepared to guide community relations activities of the U.S. Department of Energy (U.S. DOE) during its environmental studies at the Feed Materials Production Center (FMPC) located near Fernald, Ohio. The environmental studies, known collectively as the Remedial Investigation and Feasibility Study (RI/FS) and related removal actions, are being conducted pursuant to the Federal Facilities Compliance Agreement (FFCA) between U.S. DOE and the U.S. Environmental Protection Agency (U.S. EPA). This CRP follows the guidance offered in U.S. EPA's Community Relations Handbook (EPA/540/6-88/002) and in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

These RI/FS studies comply with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, known as Superfund, and the Superfund Amendments and Reauthorization Act (SARA) of 1986. The FFCA and relevant laws such as CERCLA and SARA describe the process to be followed during an RI/FS. This process calls for an ongoing and active community relations program that informs potentially affected communities of the environmental studies in progress, and provides for public involvement in key decisions made as the studies progress.

The CRP is a dynamic document designed to change in response to changing community needs. To evaluate the plan's effectiveness in meeting these needs, community members are consulted periodically. Such consultations, known as community assessments, were held when the original CRP was prepared in 1986 and again in 1989. Since 1986, increased public environmental consciousness and new information about actual and potential releases of hazardous substances from the FMPC have contributed to a more visible community interest in the plant. This CRP incorporates information gathered during the 1989 community assessment.

1.2 The FMPC Community Relations Program

Community interest in remediation activities at the FMPC is characterized by several distinctive features that this CRP is intended to address, including:

- Distinct "communities" interested in FMPC cleanup issues
- The numerous parties engaged in conducting or overseeing the CERCLA-mandated remedial and removal actions and other environmental activities at the FMPC include U.S. DOE and its contractors and subcontractors, as well as federal and state regulatory agencies and their contractors
- The public's stated interest in interacting face-to-face with U.S. DOE personnel and RI/FS team members on a regular basis

- Community interest in frequent, timely, and understandable information about site developments

- The difficulty of distinguishing between the overlapping, and often confusing, array of regulatory programs carried out at the FMPC. Some of those programs are:

  - CERCLA
  - SARA
  - FFCA
  - Resource Conservation and Recovery Act, or RCRA
  - National Environmental Policy Act, or NEPA

As a result, the community relations effort at the FMPC must use a wide variety of techniques if it is to succeed in providing the information and involvement opportunities necessary to meet everyone's needs. For example, large public meetings meet the need for face-to-face interaction in a public forum that some citizens desire, but cannot be held often enough to provide the timely release of information about site developments that a press release can accomplish. Similarly, frequent updates sent to citizens on the FMPC mailing list provide timely notification of site events between public meetings, but do not provide the one-on-one opportunity for individualized responses to questions that availability sessions do. The most distinctive feature of the FMPC community relations program, then, is the multiplicity of activities that will be undertaken to provide the broadest possible range of opportunities for community members to be informed and involved, as they so choose. These activities include:

- Large community meetings and hearings
- Availability sessions
- Community roundtables
- Fact sheets
- RI/FS progress reports
- Workshops
- Information repositories, known locally as "reading rooms"
- Administrative Record
- Hotline
- Speakers bureau
- Plant tours and Open Houses
- Videotapes
- Press releases
- Proposed plans
- Public comment periods
- Responsiveness summaries
- Comment cards
- Briefings and presentations
- Telephone and personal contacts

These activities should provide the appropriate range of formal and informal, oral and written, and small and large group opportunities for community interaction with U.S. DOE as the FMPC site investigation and remediation continue.

1.3 Plan Organization

The Community Relations Plan contains the following sections:

- **Section 1.0, Overview**
- **Section 2.0, Site Background,** describes the FMPC site and the RI/FS that is being performed, and the characteristics of the site that led to its inclusion on the National Priorities List (NPL).
- **Section 3.0, Community Background,** presents information about how local government is organized; describes the community's attitudes, concerns, and involvement with the FMPC; and discusses community information sources and information needs related to the RI/FS.
- **Section 4.0, RI/FS Community Relations Program,** identifies program highlights and objectives, techniques utilized in the community relations program, and key contacts.
- **Appendices:**

  Appendix A: Locations and Hours of FMPC Reading Rooms and Administrative Record Files
  Appendix B: List of U.S. DOE, U.S. DOE Contractor, and Regulatory Agency Contacts
  Appendix C: List of Key Community Contacts
  Appendix D: Media Contacts
  Appendix E: Southwestern Ohio and Southeastern Indiana Legislators
  Appendix F: Locations for Public Meetings

2.0 SITE BACKGROUND

This section describes the region in which the FMPC is located, identifies local population centers, and discusses the operative units of local government. In addition, a historical perspective is presented for the FMPC regarding the Remedial Investigation, Feasibility Study, RI/FS Risk Assessment, and the Community Relations Program.

2.1 FMPC Description

The FMPC is bounded by Ohio Route 126 to the north, a transmission line to the east, Willey Road to the south, and Paddy's Run Road and the Chesapeake and Ohio Railroad to the west, as shown in Figure 2.1. It occupies 1,050 acres, of which approximately 850 acres lie in northern Hamilton County and about 200 acres in adjacent Butler County. Figure 2.2 provides a close-up view of the FMPC and identifies, among other areas, the predominant Production Area, the waste pits, and the K-65 silos. The map also shows how the storm-sewer outfall ditch flows into Paddy's Run and how the Run flows through the western portion of FMPC property.

The federally owned FMPC property is considered part of Butler and Hamilton counties; it does not constitute a federal reservation. The federal government pays no local taxes to the counties or townships in which the FMPC is located, in accordance with the U.S. Constitution Article 1. A detailed description of the FMPC site is provided in Section 2 of the RI/FS Work Plan.

2.2 Description of Regional Area

The 1,050-acre FMPC is located in the Great Miami River Valley approximately 20 miles northwest of Cincinnati in Hamilton and Butler counties, in southwestern Ohio (Figure 2.1.) Although the two counties are generally urbanized, the area immediately surrounding the FMPC is primarily rural and dominated by agriculture, with some light industry. Residential, commercial, and light industrial development exist along the Great Miami River and highway corridors. Commercial and public land uses include sand and gravel operations along the Great Miami River, industrial facilities, nurseries and produce stands, and parks.

One recreational park, the Miami Whitewater Forest, lies approximately five miles southwest of the FMPC. It is one of the largest parks in Hamilton County and is used primarily during the summer. Approximately 20 percent of the 2,260-acre park is available or may be developed for public use (i.e., golfing, paddle boats, trails). The remainder is dedicated as a wildlife sanctuary. The National Register of Historic Places lists four prehistoric Indian sites within a 3 mile radius.

Figure 2.1. Regional Location of the Feed Materials Production Center

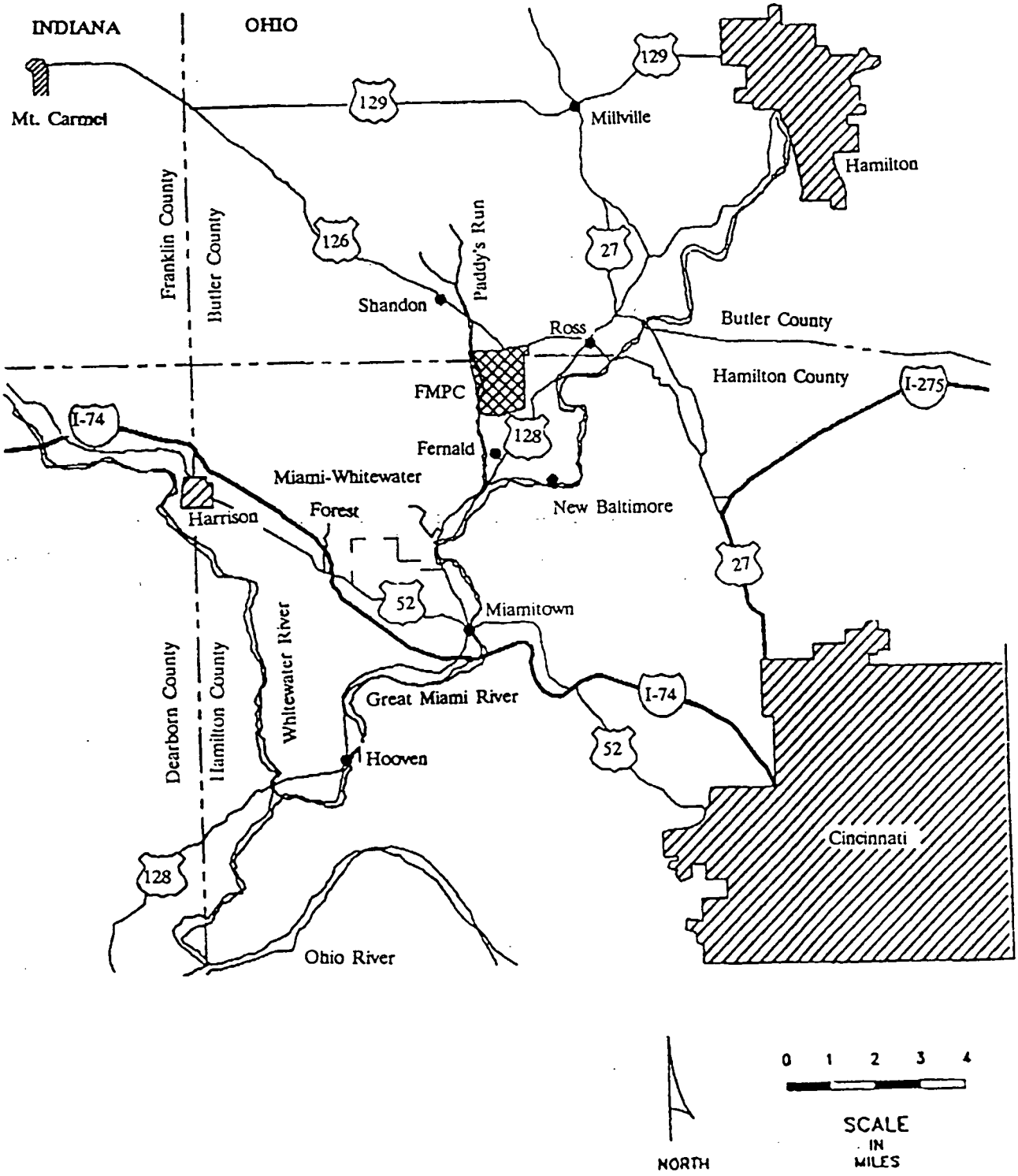
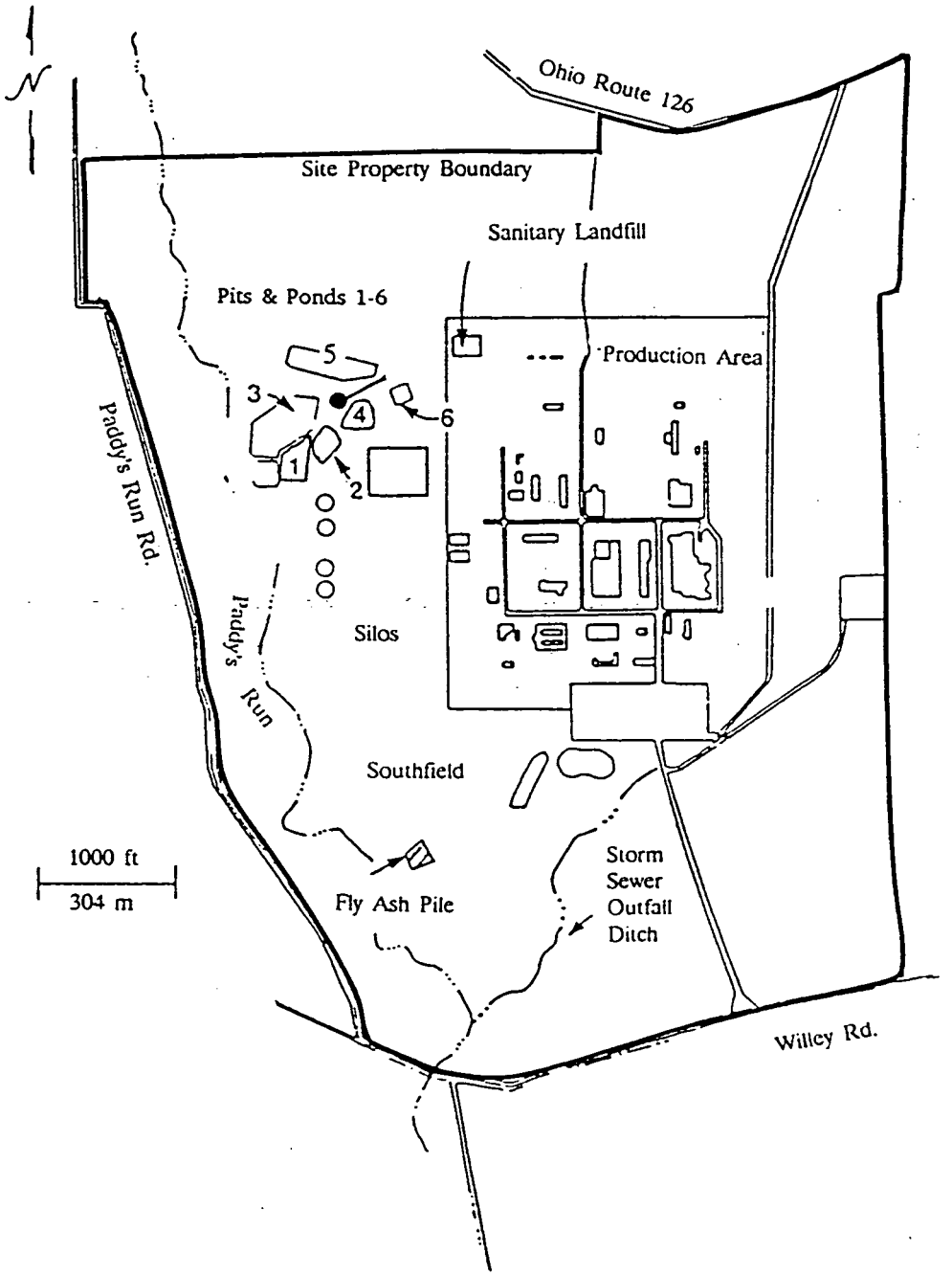


Figure 2.2. Simplified Site Map of the Feed Materials Production Center



2.3 FMPC History

Construction of the FMPC began in 1951 with production starting in 1952. The facility was originally under the auspices of the Atomic Energy Commission, followed by the Energy Research and Development Administration and currently, the U.S. DOE. From 1951 to 1985, the FMPC was managed by National Lead of Ohio, Inc. (NLO), under contract with the government. In 1986, Westinghouse Materials Company of Ohio (WMCO) assumed management of the FMPC.

The FMPC's mission was to convert uranium ore concentrates and recycled materials to either uranium oxides for shipment to gaseous diffusion plants, or machine uranium ingots and billets for manufacturing fuel cores used in production reactors as part of the U.S. nuclear weapons program. The principal product was purified uranium metal in various physical forms.

Historically, various radionuclides have been discharged to the air, soil, and water, both on and off the FMPC site. The radionuclides include those in the uranium and thorium chains, as well as trace quantities of some long-lived fission products and transuranics. Other significant radionuclides of concern include radium, radon and metal oxides associated with the K-65 Silos. Hazardous substances which have been handled at the FMPC include hydrofluoric acid, nitric acid, sulfuric acid, polychlorinated biphenyls (PCBs), tributyl phosphate, kerosene, gasoline, diesel fuel, methanol, uranyl nitrate, trichloromethane, and perchloroethane. In accordance with SARA Title III, Community-Right-to-Know, current inventories of hazardous substances are provided to local response agencies.

To date, the principal contaminant of concern identified in the RI/FS is uranium. The RI/FS continues to check for the presence of other organic and inorganic toxic substances known to have been handled or stored at the FMPC. Preliminary RI/FS results indicate that these materials are not major environmental contaminants associated with the FMPC. However, known and potential releases of radionuclides, principally uranium, were significant enough for the FMPC to be placed on the NPL in 1989.

Public and Media Interest

Environmental issues at the FMPC became the center of public controversy in late 1984 when it was reported that nearly 300 pounds of slightly enriched uranium oxide had been released to the atmosphere from the Plant 9 dust-collector system. It was also disclosed during this time that three off-site wells south of the FMPC had been found to be contaminated with uranium in 1981. U.S. DOE held four community meetings in late 1984-early 1985 and confirmed that the FMPC was responsible for the contamination of the off-site wells. A citizens group, Fernald Residents for Environment, Safety, and Health (FRESH), was formed by area residents in 1984, and has continued to monitor FMPC activities, primarily in the environment and health areas.

By 1985, U.S. DOE had initiated significant plant improvements designed to both modernize the production facilities and to address environmental, safety and health concerns identified in a June 1984 Oak Ridge Task Force Report on conditions at the FMPC. Many of those improvement

projects -- new dust-collector systems, improved stormwater-runoff control, treatment of wastewater, etc. -- have since been completed, while others are in various stages of design and construction. Some proposed projects have been cancelled or put on hold due to the change in mission from production to cleanup and environmental restoration.

As public interest in the FMPC continued to grow in 1985, reading rooms were opened at the site and in the Lane Public Library in Hamilton as part of an effort to help the public understand the FMPC's operations. Both the U.S. EPA and Ohio EPA (OEPA) assumed active oversight responsibilities at the site, and WMCO was selected as the new management and operating contractor, replacing NLO. Residents filed a $300 million class action suit against NLO (see "Lawsuits" section) in 1985.

Two events in early **1986** -- unauthorized venting of the K-65 silos and a crack in a Pilot Plant reactor vessel -- renewed public interest in the FMPC. The site appointed an Environmental Safety and Health Advisory Committee, comprising both technical experts and FMPC neighbors, which offers independent evaluation of activities at the site and communicates its findings with the media and the public via news releases or press conferences. Also in 1986, U.S. DOE held two scoping meetings on the then-proposed sitewide renovation Environmental Impact Statement.

In **1987**, the FMPC came under increasingly heavy scrutiny by various federal and state entities (see "Legislative and Regulatory Agency Interest" Section) as documents discussing environmental and safety problems at the FMPC and other facilities in the nuclear weapons complex were included in media stories. Much of the public interest centered on Government Accountability Project (GAP) discussions of potential hazards at the site and on estimated costs of site cleanup in the wake of the (RI/FS) that was begun as part of the FFCA between U.S. DOE and U.S. EPA. In the meantime, environmental improvements were continuing at the FMPC, and a program to ship low-level radioactive waste off-site was well underway.

Public concern reached its peak in late **1988.** Nationally, Congressional and media attention had turned to problems being reported throughout the federal nuclear weapons complex, but attention again quickly focused on the FMPC as a result of continuing activities in the class action suit. Locally, the Catholic Archdiocese's Fort Scott Camp, located two miles east of the FMPC, closed because "adverse publicity reduced attendance." A local Girl Scout camp, Camp Ross, closed because "of concerns it (the Girl Scout Council) has about the FMPC." In addition, a U.S. DOE study commonly referred to as the "2010 Report" recommended closure of the FMPC by about 1994, prompting heavy debate among state and federal legislators regarding the site's future. While the report recommended closing the site, it also indicated that environmental cleanup and restoration activities should continue after production ceases.

The year **1989** brought continued discussion and debate about the environmental and health effects of the FMPC, particularly with the approach of the early summer opening of a summary trial on the class action lawsuit by neighbors. Both the Ohio Department of Health (ODH) and the OEPA conducted extensive testing of public and private water supplies in the area surrounding the FMPC and found no evidence of contamination beyond the three wells that had been identified several

years earlier. In July 1989, WMCO suspended all production at the FMPC to concentrate efforts on cleanup. A U.S. DOE "Tiger Team" arrived at the site shortly thereafter. The Tiger Team was chartered by U.S. DOE Secretary James Watkins to conduct an assessment of environmental compliance and other issues at the FMPC and other U.S. DOE facilities nationwide. The team subsequently issued a report detailing several areas in which the FMPC was not in compliance. Later in the year, the FMPC was designated an NPL cleanup site. As work on the RI/FS progressed, U.S. DOE conducted three community meetings to report on the results of the environmental investigation and the alternatives being considered for final remediation.

In late **1989** and **1990**, additional moitoring wells were found to contain elevated levels of uranium. In spite of explanations that the new findings refined site characterization, plant neighbors expressed concern. WMCO also reported significant weight losses in drums of waste material which falls under the aegis of the RCRA, a federal regulation designed to control the use and disposal of hazardous chemicals. The waste materials from the drums were being transferred from the Plant 1 pad to storage areas suitable for RCRA wastes. Regular media coverage of the site continues, focusing primarily on environmental issues and long-term cleanup and restoration plans.

Legislative and Regulatory Agency Interest

OEPA interest in the FMPC became a public issue in the fall of 1984, focusing on RCRA waste on site. In 1985, the expiration of the FMPC's National Pollutant Discharge Elimination System (NPDES) permit for discharges to area waterways became an issue that eventually led to the consent decrees between the state and U.S. DOE. (In February 1990, a new NPDES permit was issued to the FMPC.) Earlier OEPA filed two lawsuits totaling more than $200 million, focusing on FMPC air and water releases, and resulting in state oversight of FMPC waste management.

Both OEPA and the ODH have tested groundwater from wells near the FMPC, finding three wells and one cistern with elevated levels of uranium. The state and U.S. DOE were involved in a dispute about state oversight of the FMPC in 1987-88. In 1988, Governor Richard Celeste recommended the plant be closed, then retracted his statement a month later. He also appointed a special committee to evaluate the plant and review the facility's health and safety, and environmental record. Governor Celeste joined the committee for a site tour and a meeting with area residents.

The U.S. EPA became more active in the FMPC in 1985, focusing on the plant's radiation monitoring and operating procedures, well contamination, and discharge of uranium-contaminated water into the Great Miami River. This eventually led to the FFCA (detailed in Section 2.4) that invoked CERCLA mandates for the RI/FS. In 1989, U.S. EPA charged WMCO with $350,000 in environmental fines, one month after naming the site to the NPL. In December 1989, a new cleanup agreement between U.S. EPA and U.S. DOE had been negotiated; it was signed April 9, 1990.

State and federal elected officials have also focused on the FMPC since 1984. Members of Ohio's congressional delegation have initiated or testified at congressional hearings and made media

statements about contamination, worker health and safety, cleanup budgets, health impacts, and U.S. EPA oversight issues at the FMPC and other facilities in the U.S. DOE nuclear weapons complex. The congressional delegation have been instrumental in making information available about FMPC historic releases and operating procedures from plant records. U.S. Representative Tom Luken of Cincinnati tried several times to expand U.S. EPA's role in enforcing environmental standards at U.S. DOE facilities such as the FMPC. In 1989, the House passed a bill calling for the government weapons industry to conform to environmental laws, at a time when U.S. EPA strengthened its enforcement activity at Superfund sites. As public attention focused on cleanup, U.S. Senator John Glenn of Ohio urged U.S. DOE to employ current plant workers for that work.

Lawsuits

In 1985, area residents filed a class-action lawsuit seeking damages for stress and decreased property values. The suit was settled after a summary trial in 1989, with U.S. DOE agreeing to pay $78 million -- $73 million for health monitoring and $5 million to local property owners. U.S. DOE paid the first installment in March 1990 with the balance due by the end of 1991. Plant employees and five unions filed a lawsuit in early 1990 seeking $1.9 billion in damages for extended medical monitoring and maintenance, in addition to punitive damages. Other miscellaneous individual lawsuits have been filed against NLO.

2.4 RI/FS History and Status

The RI/FS with its two distinct parallel activities is a comprehensive environmental investigation conducted in a systematic fashion in accordance with strict federal and state regulations and guidance. The FMPC RI/FS resulted from the FFCA that U.S. DOE and U.S. EPA signed on July 18, 1986. The FFCA ensured that environmental impacts associated with the FMPC would be thoroughly and adequately investigated so that appropriate remedial response actions could be formulated, assessed, and implemented. U.S. DOE and U.S. EPA have modified the FFCA several times since 1986. By 1990, a new CERCLA Consent Agreement that includes SARA-mandated activity had been negotiated and was signed April 9, 1990.

In response to the original FFCA, a sitewide RI/FS was initiated pursuant to CERCLA. A work plan for the sitewide RI/FS was originally issued to U.S. EPA in December 1986. U.S. DOE contracted with an environmental services team managed by Advanced Sciences, Inc. (ASI), with major subcontractors International Technology Corp. (IT) and Pennsylvania Drilling, to conduct the RI/FS. After a series of technical discussions and negotiations, U.S. DOE submitted a revised RI/FS Work Plan in March 1988 and received U.S. EPA approval in May 1988.

A proposed modification to the sitewide remedial action management strategy was introduced in August 1988, upon submission of the detailed FS Work Plan. In particular, an "operable unit" strategy was proposed to separate the FMPC into six distinct operable units into which all areas requiring cleanup could be categorized. As part of the new consent agreement between U.S. DOE and U.S. EPA, this number has been revised to five operable units. All succeeding references will be to five units. The categorization is based on similarities in the physical characteristics of the

unit, the wastes involved, the problems being addressed and their associated regulatory requirements, and the type(s) of remedial action technologies anticipated. The components of each operable unit are identified in Table 2.1 and located on the map shown in Figure 2.3.

The principal reason for the use of operable units as distinct study areas is derived from the need to address a wide variety of complex problems for the various types of facilities at the FMPC. The operable unit approach allows for a prioritization of effort, a focus of technical resources, and more effective project management. In addition, the operable unit approach can accommodate separate schedules so that the FS process for each operable unit can be finalized at the earliest possible date -- and remedial actions can be initiated. Therefore, cleanup will be able to proceed before the analysis of the total site is complete. This approach will result in five RI and FS reports -- one for each operable unit.

To date, RI findings have confirmed elevated levels of uranium in groundwater both on and off property. As of June 1990, RI studies have confirmed the following information about the nature and extent of contamination in each operable unit:

- **Operable Unit 1 - Waste Storage Area.** Elevated levels of uranium have been found in the waste storage area. Studies to date have shown that stormwater runoff has served as a vehicle to transport this contamination to Paddy's Run, which in turn has contributed to the area identified as the south plume. The Waste Pit Engineering Evaluation/Cost Analysis (EE/CA), will identify a method to contain this potential pathway.

- **Operable Unit 2 - Solid Waste Areas.** Monitoring wells in the Southfield Area (located within property boundaries) have shown elevated levels of uranium. Additional monitoring wells are planned to determine the depth and extent of contamination in this general area at the southwest corner of plant property.

- **Operable Unit 3 - Facilities and Suspect Areas.** Elevated levels of uranium have been found in perched groundwater beneath plant facilities, as identified in the RI for Operable Unit 3. Some of the contaminated water has been pumped from beneath Plant 6 as part of the removal action associated with this operable unit. The RI has identified two new pockets of contaminated water found near Plant 9 and Plant 2/3. Investigations are continuing to identify any new evidence of releases of contamination to the environment that may need to be defined and investigated as part of this operable unit.

TABLE 2.1
FMPC FEASIBILITY STUDY OPERABLE UNITS

Operable Unit No. 1
Waste Storage Area

Pits 1,2,3,4,5,6
Clearwell
Burn Pit

Operable Unit No. 2
Solid Waste Areas

Lime Sludge Ponds
Fly Ash Piles
Sanitary Landfill
Southfield Area

Operable Unit No. 3
Facilities & Suspect Areas

Soils and Perched Groundwater Underlying Production Area Facilities
Other Suspect Areas:
- Fire Training Area
- Wastewater Treatment Incinerator Area
- Three Rubble Mounds
- Scrap Piles
- K-65 Slurry Line
- Main Effluent Line
- Clearwell to Manhole 175 Pipeline
- Flagpole Area
- One Area in Buffer Zone

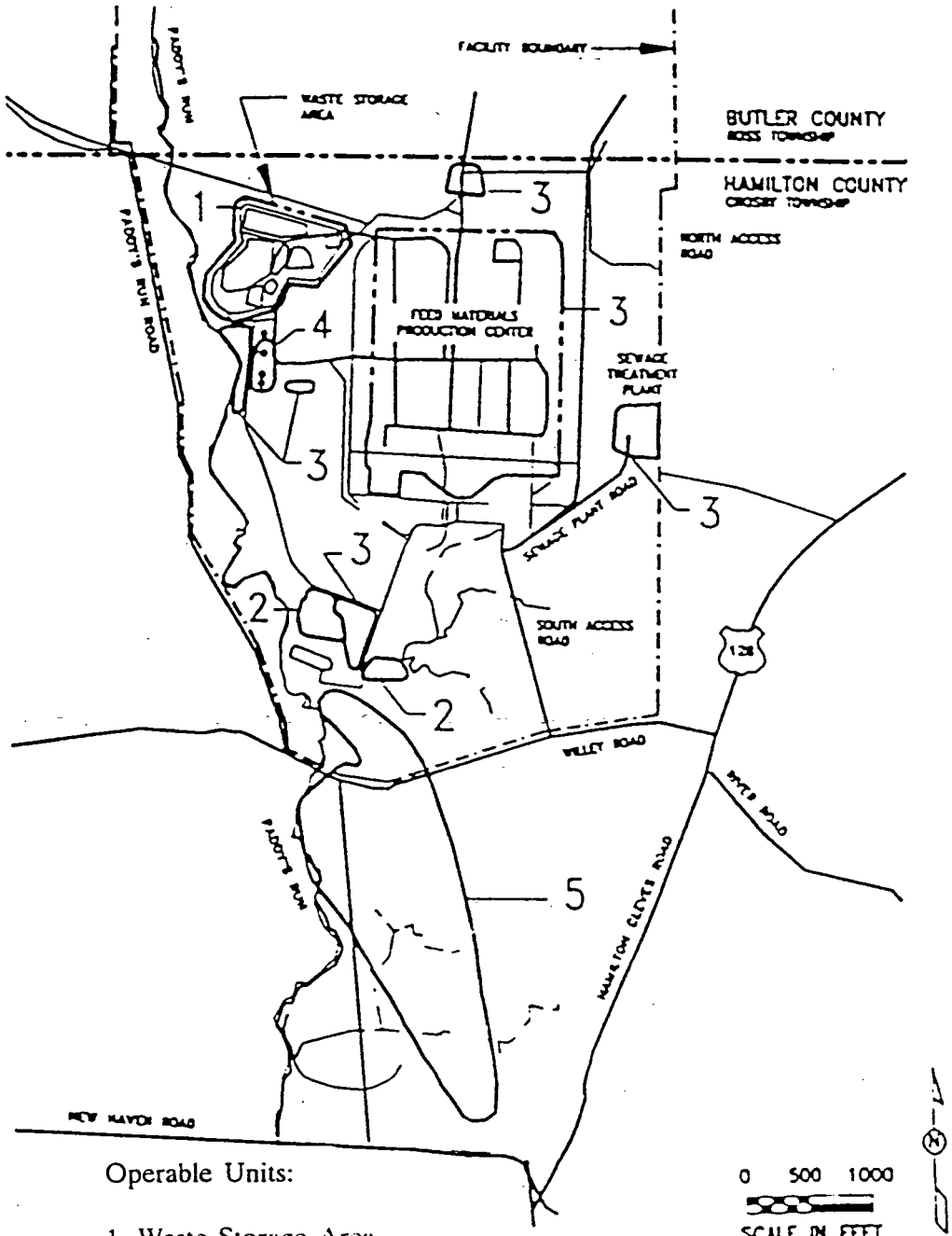
Operable Unit No. 4
Special Facilities

K-65 Silos
Metal Oxides Silo
Silo 4

Operable Unit No. 5
Environmental Media

Soils/Sedimentation Outside Production Area
South Plume
Flora and Fauna
Regional Aquifer

Table 2.3 Map of FMPC Feasibility Study Operable Units



Operable Units:

1. Waste Storage Area
2. Solid Waste Areas
3. Production Area
4. Special Facilities (Silos)
5. South Plume, part of Environmental Media

- **Operable Unit 4 - Special Facilities (Silos).** Efforts continue to focus on sampling silo contents in order to identify the physical properties of the contents. This information will be used to develop FS alternatives. A new silo structural analysis has confirmed earlier studies.

- **Operable Unit 5 - Environmental Media.** All other media not addressed under other operable units including an area of off-property contamination (referred to as the south plume) located on private property. New monitoring wells are planned to define the western and southern limits of the plume. The associated analysis of removal action alternatives was submitted to U.S. EPA August 1, 1990 and is available for public review.

All five operable units are proceeding according to the consent agreement schedule; the public will be invited to comment on the proposed plan for each operable unit. Submittal schedules are shown in Table 2.2, with additional detail is provided in Table 4.2. A separate risk assessment is being prepared for each operable unit, and will be submitted as an addendum to each RI report. The risk assessments compare the levels of contaminants found both on and off plant property against public health and environmental standards and criteria, and evaluate them in the context of population characteristics.

After state and community comments are received, U.S. EPA will issue a Record of Decision (ROD) for each operable unit. Comment responses will be documented in separate responsiveness summaries which will be compiled for each operable unit. These documents will be placed in the Administrative Record (AR). After detailed engineering design for the alternative selected in the ROD is complete, final cleanup (or remediation) can begin.

2.5 Removal Action History and Status

Major environmental studies, such as the RI/FS underway at the FMPC, may identify conditions that require remedy to prevent known contamination from spreading, or to protect public health and the environment sooner than RI/FS schedules allow. These shorter-focus cleanup activities, known as removal actions, are also covered by CERCLA and the NCP. Each is documented in a separate AR file, as mandated by CERCLA (see subsection 2.6 for a discussion of the FMPC AR).

Removal actions may be identified at any time during the RI, FS, and remedial activities. Removal action procedures, schedules and documentation are dictated by the NCP and the OSWER Directive 9360.0-03B, Superfund Removal Procedures, Rev. 3. For example, if the planning for a removal action is complex and requires more than six months to accomplish, or if the threat to the environment is not immediate, a "non-time critical removal action" will be initiated and an EE/CA is prepared. The EE/CA evaluates the best remedy for a removal action cleanup. If the threat to the environment is immediate or when planning for the removal action takes less than six months, an EE/CA is not required. This type of removal action is a "time critical removal action."

TABLE 2.2
PRIMARY REPORT AND DRAFT ROD DATES FOR RI/FS OPERABLE UNITS PER CERCLA CONSENT AGREEMENT (SIGNED APRIL 9, 1990)

Specified Draft Primary Report and ROD Dates

Operable Unit	1	2	3	4	5
Initial Screening of Alternatives	23JUL90	29OCT90	24SEP90	04JUN90	27AUG90
RI Report / Risk Assessment	18FEB91	11FEB91	08APR91	27AUG90	08APR91
FS Report *	25MAR91	25MAR91	15MAY91	25NOV90	15MAY91
Proposed Plan	16MAY91	15MAY91	31JUL91	16JAN91	02AUG91
Draft Record of Decision	18DEC91	18DEC91	10MAR92	16AUG91	12MAR92

U.S. DOE has adopted a comprehensive community relations strategy for all removal actions. Removal action community relations activities are incorporated into the integrated community relations program designed to inform and involve the community with respect to RI/FS activities at the FMPC. Several of the same community relations activities may be required for both RI/FS and removal action activities, such as community meetings, public comment periods, community interviews, materials development and dissemination, documentation in the FMPC reading rooms and the AR, responsiveness summaries. Removal actions are discussed routinely during RI/FS community meetings, and plan to be included in the FMPC cleanup progress report. All public participation is documented in the AR established for each removal action.

Individual CRPs for the South Groundwater Contamination Plume Removal Action and the Waste Pit Area Run-off Control Removal Action have already been issued; NCP community relations requirements for future "non-time critical removal actions" will be incorporated in this RI/FS CRP as addenda. Community relations activities for a "non-time critical removal action" will be performed according to the generic schedule provided in Table 4.1, with "Day 1" representing the date of issue of the EE/CA document. Community relations activities for a "time critical removal action" will be consistent with the RI/FS community relations strategy outlined in this document. A separate CRP addendum will be prepared for any "time critical removal action" where the physical on-site activities for the time critical removal action last longer than 120 days.

All four removal actions documented in the April 1990 Consent Agreement were discussed during the May 22, 1990 RI/FS community meeting. These removal actions -- and status, as of August 1990 -- are:

- Removal Action 1: Removal of contaminated water beneath FMPC buildings -- Monitoring wells identified pockets of contaminated water in Plant 6, then later beneath Plant 2/3 and Plant 9. In late 1989, the perched water beneath Plant 6 began to be pumped and treated at FMPC treatment systems. Since then, pumping had been suspended after volatile organic materials were detected in the groundwater. Reports on this removal action is included in the AR. Appropriate work plans are being developed for work beneath Plants 2/3 and 9. This removal action was discussed during RI/FS community meetings in 1989 and 1990.

- Removal Action 2: Control of run-off water from the waste pit area -- This area includes six pits, a burn pit, and the Clearwell (a stormwater run-off collection point) which have been used for the storage and disposal of radiological and chemical wastes from plant operations over the years. Analytical results to date indicate that elevated concentrations of uranium are present in stormwater run-off from this area. An EE/CA which identifies a removal action strategy for this area was submitted to U.S. EPA on May 30, 1990 and revised on August 10, 1990. A public comment period was held May 30 - July 2, 1990.

- Removal Action 3: Control of groundwater contamination in an area south of the FMPC property known as the "south plume" -- The south plume (identified as Operable Unit 5 on Figure 2.3) represents a portion of the regionally important Great Miami Aquifer that has elevated levels of uranium and is a potential off-property migration pathway for uranium. The EE/CA, which identifies options to control the uranium plume, was submitted to U.S. EPA and the AR on April 16, 1990, and revised on August 1, 1990. A workshop discussing the EE/CA was held May 30, 1990. A public comment period on the EE/CA was held from April 16 - June 18, 1990.

- Removal Action 4: Control of contamination from contents of the silos -- Two of the four 80-foot-diameter concrete silos store radium-bearing materials which release radon gas to the atmosphere and which may leach contaminants to underlying soils and aquifers. In addition to the final remedial action covered by Operable Unit 4, the K-65 Silo EE/CA was issued August 1, 1990 which recommended actions to minimize the potential release of contaminants resulting from a catastrophic failure of the silo domes. This EE/CA also examined radon release mitigation measures. A study of the silos' current structural integrity confirmed the probability of dome failure in the event of a tornado and the uncertainty of the silos' remaining design life. Finally, the University of Cincinnati is developing a probability risk assessment concerning the likelihood and consequences of failure of the silos.

There is a high probability that additional removal actions will be identified during the RI/FS process.

2.6 Administrative Record History and Status

An official file of all documents that support decisions made in the RI/FS and in each removal action is being created and will be maintained by the lead agency (U.S. DOE), and made available to the public in a timely manner. This file, known as the Administrative Record (AR), is required by CERCLA, the NCP (40CFR300.800 Subpart I), and the terms of the FFCA between U.S. DOE and U.S. EPA. Procedures for FMPC AR establishment and maintenance will be issued in 1990. When complete, the AR will form the legal basis for cleanup decisions for both remedial and removal actions.

The AR includes, at a minimum, factual information and data obtained prior to and during the RI/FS studies, policy and guidance documents, a record of public participation, information from other agencies, enforcement documents (such as the FFCA and administrative orders), and an index. In addition, this agreement specifies two types of documents that U.S. DOE must include in the AR. These are known as primary and secondary documents. Primary documents are identified in Table 2.2. Secondary documents that must be included are the Site Characterization Study that pre-dated the RI/FS, initial remedial action and data quality objectives, the detailed analysis of alternatives that is performed in each FS, the post-screening investigation work plan, treatability studies, sampling and data results, and a summary of public comment received and U.S. DOE response to those comments.

The FFCA specifies a local AR location, in addition to the U.S. EPA Region 5 office in Chicago (see Appendix A). U.S. DOE will ensure that AR documents are clearly identified in the AR.

The FFCA also specifies that the AR and its index will be updated bi-monthly. A copy of the modified AR Index will be submitted to U.S. EPA with each addition to the AR. Distinct AR files will be maintained for each operable unit in the RI/FS and for each removal action that U.S. DOE and U.S. EPA identify.

2.7 Environmental Impact Statement History and Status

U.S. DOE has begun work on two separate Environmental Impact Statements (EIS) at the FMPC. In 1986, U.S. DOE began preparing a Renovation and Remedial Action EIS to evaluate the impacts of then-proposed renovation activities and future remediation at the FMPC that would improve environmental health and safety conditions and production reliability and would restore production to a level that would meet projected defense needs. Scoping meetings were held in the fall of 1986. Since then the remedial action portion of this EIS has been deleted because of the U.S. DOE's decision to conduct the RI/FS. The Renovation EIS is currently in draft form and is expected to be released soon.

In 1989, U.S. DOE decided to integrate into the RI/FS a distinct EIS to evaluate the impacts of the cleanup to the environment as mandated by U.S. DOE Notice 5400.4. The announcement of the new EIS met with public criticism because of the yet-to-be-finalized Renovation EIS.

The new EIS focuses on environmental concerns associated with implementing remedial actions, as mandated by the National Environmental Policy Act (NEPA). NEPA established federal requirements to ensure that environmental and social impacts associated with major federal actions -- such as the remediation activities that will be proposed for the FMPC -- are evaluated before a final alternative is selected and action implemented.

The FMPC NEPA-CERCLA integration plan, finalized in early 1990, defines the FMPC RI/FS-specific process by which the NEPA-based regulations, requirements, and guidelines can be integrated into and satisfied within the context of the enforcement-driven RI/FS process and the operable unit approach adopted for the FMPC. A NEPA public comment period will be scheduled when each operable unit's FS report (which will contain NEPA discussion) is submitted to EPA (see Table 2.2). The EIS effort involves scoping meetings, NEPA data preparation and documentation, impact analyses to support the operable units, evaluation of cumulative effects, preparation of draft and final Environmental Impact Statement documents, and associated public hearings, public comment periods, and responsiveness summaries.

To ensure both CERCLA/SARA and NEPA public involvement requirements are met, NEPA activities are being integrated into the RI/FS Community Relations program. This integration is designed to provide an exchange of information, avoid duplication of public participation and scheduling efforts, and share resources in the preparation of public meetings and hearings. For example, the RI/FS Community Relations staff and the NEPA staff are cooperating to provide consistency in meeting approaches and optimal meeting scheduling. Also, the staff working on NEPA documentation are available to make presentations and answer questions at RI/FS community meetings about the NEPA process as it relates to the FMPC RI/FS.

3.0 COMMUNITY BACKGROUND

This section of the FMPC RI/FS CRP describes the affected communities and how they would obtain information about the FMPC; their attitudes, concerns, and basic information needs, and discusses their involvement with FMPC environmental efforts. All statements presented in this section are based on the community assessment performed in 1989, as well as on media articles and comments made by area residents during and following RI/FS community meetings in 1989. This summary identifies typical concerns and should not be interpreted as neither exhaustive nor representative of all community members.

3.1 Population and Units of Local Government

The combined population of Hamilton and Butler counties is 1,153,700. Hamilton County supports a population of about 874,100, while Butler County has a population of 279,700 (State of Ohio 1988 Estimates of Population).

Most of the communities surrounding the FMPC are unincorporated towns varying from an estimated population of 39 in Fernald to approximately 3,000 in Ross. Figure 2.1 identified these communities, which have been characterized as agricultural and as "bedroom communities" for commuters in the greater Cincinnati area.

The township is the basic unit of local government in the area where the FMPC is located. There are three township governments within two counties in the immediate vicinity: Ross Township and Morgan Township in Butler County; Crosby Township in Hamilton County. Representatives of township government participate in emergency preparedness activities at the FMPC, receive regular reports about FMPC activities from FMPC staff, and are included in the list of persons contacted about unusual activities at the plant. Each township derives its authority from its parent county. Table 3.1 presents the population of each township surrounding the FMPC. Communities located in the vicinity of the FMPC are identified.

There are no hospitals or retirement homes within five miles of the FMPC. The closest such facilities are located in the cities of Hamilton and Cincinnati. The nearest public schools are located approximately 2 to 3 miles from the FMPC. Air monitoring stations and/or emergency warning systems are located near schools in the area. Area public schools are identified in Table 3.2.

3.2 Definition of Community

For the purpose of this CRP, the term "community" is defined as FMPC neighbors and other persons interested in environmental activities (including the RI/FS) at the FMPC. The community can be differentiated by two dimensions: geography and the level of interest in technical information concerning the FMPC.

TABLE 3.1
POPULATION STATISTICS FOR SOUTHWESTERN OHIO

TOWNSHIP (including unincorporated communities)	POPULATION
Ross Township	6,020
Millville	
Ross	
Shandon	
Crosby Township	2,850
New Baltimore	
Fernald	
New Haven	
West Crosby	
Morgan Township	4,840
Okeana	
INCORPORATED COMMUNITIES	
City of Harrison	7,100
City of Hamilton	65,500

Note: Intercensal estimates are not produced for unincorporated communities due to the difficulties of obtaining accurate data.

Source: Estimates of the population and per capita income for incorporated places and sub-county areas in Ohio 1980 to 1988. Ohio Data Users Center Department of Development in conjunction with the U.S. Bureau of the Census. Columbus, Ohio; December, 1989.

TABLE 3.2
PUBLIC SCHOOLS LOCATED IN THE VICINITY OF THE FMPC

SCHOOL	LOCATION
Elda Elementary School	Ross
Ross Middle School	Ross
Ross High School	Ross
Crosby Elementary School	New Haven Road, near New Haven
Morgan Elementary School	Near Shandon

Geographic Considerations of Community

Geographically, the community can be categorized into two groups:

- Those who reside within the 5-mile radius of the FMPC, primarily in the communities of Fernald, Ross, Shandon, New Baltimore, New Haven, and Okeana, Ohio, supplemented by residents of the two larger communities of Hamilton and Harrison, Ohio.

- Those who live in the Greater Cincinnati metropolitan area; to date, this has included members of groups focusing on environmental and nuclear issues, as well as units of local government.

Proximity to the FMPC directly affects community preferences about the types and immediacy of information received about environmental issues at the FMPC. Here are two examples obtained from the 1989 Community Assessment:

- Persons living close to the FMPC expressed more concern about the quality of drinking water, the effect of the plant on their health, and the value of their land, while interested persons in the Greater Cincinnati area focused on the more global nuclear weapons and nuclear power issues.

- Timely information about site-specific events that people can see or hear about locally is critical to plant neighbors, whereas persons living farther away from the FMPC expressed more interest in broader-scope issues.

Proximity to the FMPC also affects public attendance at community meetings. The majority of persons who regularly attend RI/FS meetings live in the vicinity of the FMPC. This is confirmed

by those who ask questions at the meetings and by the addresses on the comment cards submitted to U.S. DOE.

Information Complexity

From an information-needs perspective, the affected community is represented by individuals who require basic information concerning the FMPC's mission and current status, to those who request detailed information concerning all aspects of FMPC activities and relevant national policy. Community interviews (described in Subsection 3.4) clearly demonstrated a need for this range of information to be communicated. For example, some interviewees did not have a clear understanding of the FMPC mission, while others were well informed of the status of the RI/FS, uranium levels, and south plume progress. The challenge for future community meetings and publications is to cover this wide range.

3.3 Community Involvement with the FMPC

Before 1984, community involvement with the FMPC was minimal. Identification and disclosure of contamination at the FMPC in 1984 significantly increased the FMPC's profile in the community. The FMPC became the subject of frequent media attention, much of it critical, both locally and in the national press. Media reports fueled community fears and concerns, and raised questions about the impacts of the FMPC's operations on the health of FMPC workers and plant neighbors -- questions that were not immediately answerable. In 1985, plant neighbors had filed a class action suit seeking damages from the FMPC for stress and for decreased property values, which further clouded relationships between U.S. DOE and community residents.

The RI/FS, begun in 1986, started to provide answers to many of the community's questions about the type and extent of FMPC contamination and its potential effects on human health and the environment. Many questions still remain, however, and the high level of community interest in and involvement with FMPC site contamination issues that has existed since the first disclosures in 1984 can be expected to continue unabated for the foreseeable future. A list of other events or activities since 1984 that have impacted community involvement is provided below.

- U.S. DOE held four community meetings in the year following the announcement of the air emission and off-site well contamination in 1984.

- A local citizens group named FRESH was formed in 1984 as a result of these disclosures. Since then, FRESH has been an active voice in the community with an interest in health, U.S. DOE accountability, and site cleanup issues. According to a FRESH spokesperson, the group began with about 50 involved persons; that number has since risen to about 300.

- An AR for the RI/FS and all removal actions was established in 1989. The location as of July 1990 is in the JAMTEK Building, 10845 Hamilton-Cleves Highway, Harrison, Ohio. The site is called the Public Environmental Information Center.

- Two public reading rooms that were opened in 1985 have been consolidated into the new AR location south of Ross, Ohio. Two other reading rooms, the Greater Cincinnati and Hamilton County Main Library in downtown Cincinnati and the Public Library in Harrison, Ohio, were established in 1989. These locations were added after residents' requests. (Appendix A provides locations, telephone numbers and hours.)

- Area residents have participated in media interviews since 1985, resulting in both local and national television programs, and newspaper and magazine articles focusing on the FMPC. National media attention was prevalent in the fall of 1988 and again in late 1989-early 1990, with articles about the FMPC and the entire U.S. DOE nuclear defense facilities network appearing in Time (cover story), U.S. News and World Report and Newsweek magazines, as well as in newspapers with national circulation and syndicated television programs, such as the Phil Donahue Show.

- A major activity that is not directly related to the RI/FS but that has had a highly visible role in community involvement is the extensive FMPC emergency preparedness program designed to respond to a plant emergency. This program includes routine cooperation with local government officials, an emergency-warning siren system, emergency drills, and an ongoing community information program. The 1989 Community Assessment (see Subsection 3.4) revealed that individuals involved in this emergency preparedness network tend to be well-informed about the FMPC and related environmental studies.

- The FMPC Health and Environmental Advisory Committee was created as an advisory group in 1985 to review FMPC activities. The committee consists of environmental experts from industry and prominent universities, as well as concerned citizens and environmental activists groups. Its first priority was to ensure that the emergency siren system was installed and fully operational. Since then, it has reviewed both environmental and safety-related issues at the FMPC. The committee meets quarterly and presents its conclusions to the community by issuing a press release or holding a press conference after each meeting.

- In 1986 when the RI/FS began, a community assessment identified community concerns about the health and welfare of those who live near the FMPC and shortly thereafter WMCO named a Community Relations Manager as a point of contact for the community. Another community assessment was performed in 1989.

- The FMPC Update began publication in 1987 and has been the primary communications tool with the local community until regular public meetings began to be held in 1989. The FMPC Update is issued on an "as needed" basis (approximately four times a year) and distributed to nearly 900 persons who asked to be on the FMPC mailing list. The Update covers a wide range of FMPC activities and recently has given more attention to RI/FS topics, although this is not its primary focus.

- In September 1988, an FMPC open house was held. The open house featured a tour of the plant and a major RI/FS exhibit, which included a videotape, a slide show, and a photographic and field equipment display. Technical RI/FS staff answered community questions.

- In 1989, three community meetings were held to discuss the RI/FS and related topics. RI/FS-specific fact sheets have been prepared and distributed during these community meetings and through the public reading rooms. Area residents submit comment cards during or following these meetings; most ask to be added to the RI/FS mailing list. U.S. DOE responds to all queries needing follow-up in writing, on the telephone, or in person.

- According to plant records for Fiscal Year 1989, about 750 persons participated in 75 plant tours, 440 students participated in 22 Partnership in Education programs, and 239 other contacts with community members were logged.

- A series of community roundtables was initiated in 1990 to discuss a wide range of FMPC issues with area residents. These roundtables are typically informal and small group in nature.

3.4 Community Attitudes and Concerns

Following the announcement of air emissions and off-property well contamination in 1984, community members voiced concern about the following issues during four community meetings held by U.S. DOE:

- Property values
- Communication between U.S. DOE and the local community
- Long-term health effects of the FMPC on the surrounding population

To expand and update this information, U.S. DOE conducted Community Assessments in 1986 and 1989. A Community Assessment is a series of interviews with local community members to assess information needs and sources, attitudes toward the FMPC, the environmental issues raised by the RI/FS, and public involvement with the site. These two assessments are described briefly below.

1986 Community Assessment

In 1986, plant neighbors were interviewed. At that time, their general concerns were:

- Accurate, timely communications
- Ease of access to information
- Adequate access to technical information
- Declining property values
- Access to contractor staff performing the RI/FS

Health and environmental concerns centered around:

- The K-65 silos
- Noise and ground vibrations from plant machinery and processes
- Identification of and information about radiological and toxic materials on site
- Fumes and air particulates from the FMPC
- Threats to drinking water
- Potential for increased rates of cancer

1989 Community Assessment

To update U.S. DOE's knowledge about community concerns, the RI/FS Community Relations staff conducted a second community assessment in the summer of 1989. Interviewees who live in the vicinity of the FMPC included:

- Plant neighbors, many of whom lived near the FMPC for 10 years or more
- School administrators
- Former plant workers
- Parents with children (young or grown) who live near the FMPC
- Persons who live near the FMPC with incidences of cancer in their immediate families
- Spokesperson for a recreational facility near the plant that closed recently
- Representatives of FRESH
- FRESH supporters and non-supporters
- Local business owners
- Township elected officials
- County emergency response team personnel
- Former local business owners
- Clergy
- Farmers
- Spouse of current plant employee
- Family who sold land to FMPC before it was built

In addition, persons in the Greater Cincinnati metropolitan area were identified and interviewed. They represented the Cincinnati City Council's Intergovernmental Affairs and Environment Committee, and various environmental and anti-nuclear organizations. The persons interviewed were not intended to provide a statistically representative sample.

Interviewees were identified from FMPC contact lists (Appendix C), from local township governing boards, from newspaper and magazine articles, and from referrals. Interviewees were chosen from among those who might have cause (such as proximity to the FMPC, employment, environmental awareness, participation in emergency response activities) to be interested in or informed about plant environmental activities. Each person was interviewed for about one hour-and-a-half and promised anonymity at the outset.

This interview process shed light on a broad spectrum of community attitudes about the FMPC and its environmental activities. The public preferences expressed during the interviews provide the basis for many of the community relations activities specified in the Community Relations Plan.

Many persons interviewed expressed distrust of information provided by U.S. DOE. Their reasons varied; they felt they had received misinformation, inadequate information, or information that only told the "good news." They questioned why some announcements of events or occurrences do not appear to be timely. They noted contradictions between U.S. DOE data and data released by other agencies.

Another commonly held attitude identified during the community interviews was the concern that there are still too many unknowns about site contamination and its potential health effects. Interviewees identified the following factors as contributing to this attitude: the greater secrecy under which the FMPC previously operated, the technical complexity of information about plant operations and the environmental consequences, and U.S. DOE's credibility problem discussed in Section 4.0.

The local community has many concerns about the FMPC and the environmental issues raised by the RI/FS. The major concerns identified in the community assessment follow. The results, which revealed a significant shift in the community's perspective of the FMPC since the assessment conducted in April 1986, are summarized below. They are generally listed in order of how frequently they came up and how much people discussed them.

The Effect of the FMPC on Human Health. Health effects, particularly on children, were overwhelmingly the primary concern of all persons interviewed. Interviewees expressed alarm or had concern that plant neighbors and current and former employees have health problems that many believe are related to contamination from the FMPC. They also expressed concern about persons in these groups who are now healthy but who may be diagnosed as having cancer in the future. Interviewees cited cancer, birth defects, learning disabilities, and leukemia as potential health impacts about which they are concerned. These concerns also were reflected in articles focusing on the FMPC that have appeared in the national news media, such as Time, Newsweek, U.S. News and World Report, Good Housekeeping, and McCall's, during the past two years. It should be noted, however, that not all of the persons interviewed who have family members with cancer or birth defects blamed the FMPC as the cause of their illness.

The Effect of the FMPC on Property Values. Public perceptions of the health impacts are strongly related to the property value issues. The public generally holds the perception that property values

surrounding the FMPC have decreased in recent years because of the notoriety of the plant and questions about its impact on the local environment and human health. Many interviewees attributed the negative impacts on property values to concern about potential health effects that nearby residents might suffer. Specific concerns include devalued property, inability to sell property within a "reasonable" time, at a "reasonable" price, and a smaller pool of buyers interested in purchasing property in the vicinity of the FMPC. While not unanimous, there was strong sentiment among interviewees supporting this view. Property values were a major issue during the class action suit's summary trial held in June 1989.

Contamination. A widely held view among persons interviewed was that the FMPC has contaminated local water supplies and the air. Concern about environmental contamination, while not unfounded, was generalized; few interviewees provided specifics. WMCO added a Cincinnati City Council representative to the FMPC Environmental Health Advisory Committee; this is an example of the concern that Cincinnatians have about potential contamination of the city's water supply.

K-65 Silos. The K-65 silos appeared to represent a focal point for community concern. The silos were readily recognized by local community members who were interviewed. There was a general lack of information about their contents and persons expressed fear about radioactive contamination either leaking out over a period of time or spilling into the local environment due to a major structural failure of the silos themselves.

Plant Closing with No Cleanup. In the absence of an announced decision about an anticipated plant closing, interviewees expressed much concern about when the plant may close and U.S. DOE's cleanup plans for a non-operational facility. Many persons expressed the fear that U.S. DOE would not clean up the plant if the FMPC closes. Some persons, mostly located in the Greater Cincinnati area, expressed concern that the area could become a fenced-off "sacrifice zone."

Other Issues. Fewer interviewees expressed other related concerns, including:

- **Transportation and final storage of nuclear materials and waste from the FMPC.** One resident raised the following questions: How would local residents be protected from contamination if a truck or rail accident occurred? Would they be notified of shipment dates and routes? If an off-site repository is not available, what facilities are available at the FMPC to safely store the material and waste indefinitely?

- **The effect of the FMPC on the local economy.** Another resident raised the following questions: Do fewer people buy locally grown fruits and vegetables because they are afraid of contamination? Is locally produced milk safe? What other economic effects can we expect, in the wake of the two residential summer camp closings in the area?

- **The FMPC emergency warning system.** Some residents believe the siren, which is tested once a week, is too loud; others, not loud enough. In addition, people who are trying to sell their homes report that the siren discourages prospective buyers.

3.5 Community Information Needs and Sources

The persons who were interviewed identified several specific information-needs which focused on both content (information, message, technical complexity) and format. Following is a summary of the types of information and the format recommended by interviewees.

Topics Needing More Information

The following represent specific areas of information that interviewees suggested U.S. DOE make available. Many, but not all, of these topics are related to areas of concern identified in Section 3.4 of this document. More commonly mentioned information needs are listed first.

- Health risks to persons living near the FMPC
- Biological issues -- studies conducted independently of the RI/FS on how uranium enters the food chain through meat or milk
- Storm-water runoff
- The quality of groundwater
- Identification of materials stored on site (now and in the past) and uranium processing performed at the FMPC
- Environmental sampling and monitoring of air, soils, water, plants and animals on privately owned land near the plant

Since the community assessment was completed, several other issues have arisen during public meetings and in the media. Such issues include the suspension of production, FMPC investigations conducted by U.S. DOE's Tiger Team and the Federal Bureau of Investigation, new RI/FS findings of elevated levels of uranium in on-site and off-site groundwater, the CERCLA Consent Agreement between U.S. DOE and U.S. EPA, residents' concern over the cost of cleanup, leakage of waste materials stored at the plant, the suit filed by plant union employees, and the status of WMCO's plant operation and maintenance contract.

Community Information Sources

Members of the communities receive their information about the FMPC and the RI/FS from several sources. Here is a summary, with the most widely used information sources listed first:

The Local Media. Newspapers include the Cincinnati Enquirer, the Cincinnati Post, the Hamilton Journal-News, and the Harrison Record. All metropolitan Cincinnati television stations were named as information sources. Radio stations WKRC, WLW, and WCKY call the FMPC on a regular basis and cover press conferences and major events. In spite of their dependence on the media, many area residents expressed their dissatisfaction with the media's tendency to focus only on "bad news."

Word of Mouth. Persons interviewed indicated that they tend to listen to what their neighbors and friends say about the FMPC. Among those "neighbors and friends" identified by interviewees were current and former FMPC workers. Word-of-mouth information clearly is the number two source of information for persons who were interviewed.

Direct Contact. Direct contact with the FMPC occurs most often at the community meetings. Area residents also said they have participated in plant tours, the emergency preparedness programs, and various environmental sampling activities.

FMPC Publications. FMPC publications identified by interviewees as sources of information about the plant included the FMPC Update and the annual Environmental Monitoring Report.

Environmentally Focused Organizations. National environmentally focused organizations named as information sources include the Sierra Club, Greenpeace, the Cincinnati Chapter of SANE/FREEZE: Campaign for Global Security (an organization dedicated to abolishing nuclear weapons), and related national information networks. The concern of the broader-based environmental groups in the Cincinnati metropolitan area focused on water quality, in particular, and on the nuclear issue, in general. For example, SANE-FREEZE hosted a meeting about the FMPC in February 1989. Only occasionally do persons who attend FMPC community meetings identify themselves as members of these groups.

One local citizen activist group, FRESH, was identified as a source of information about the FMPC upon which community residents rely. Many interviewees said they had attended FRESH meetings in recent years, whether or not they were members. There were varying opinions, ranging from non-support to support for FRESH.

State and Federal Agencies. Only one person interviewed acknowledged invoking the Freedom of Information Act to obtain FMPC records. Some residents contacted agencies such as U.S. EPA and OEPA for information and some have contacted the ODH to have their water sampled and analyzed.

Suggested Communication Techniques

The 1989 community assessment provided suggestions on communication techniques that might be helpful for U.S. DOE to pursue. The following summary, based on these interviews, suggests how

the community members might like to receive future information about the FMPC's environmental activities.

Publications. Interviewees were most interested in receiving or continuing to receive written information about the FMPC RI/FS. Regarding the FMPC Update, persons interviewed said they would prefer simple, focused articles that relate complex RI/FS technical material to daily life, cleaner publication design, and more RI/FS "news." Across the board, persons interviewed said they wanted more information, and information that they could trust. A few persons recommended focusing the FMPC Update solely on the RI/FS.

Community Meetings. Most of the persons interviewed had attended at least one community meeting. Their opinions about meetings ranged across the board, from support of large group meetings, to support for small meetings and workshops, to eliminating meetings. Most interviewees wanted to receive handouts based on speakers' presentations. A few of the suggestions for alternative approaches to community meetings included: holding meetings in different locations; videotaping meetings so area residents can view the tapes at their convenience; holding a dialogue with plant managers (no technical staff); and holding a small group meeting or series of meetings that focus on specific topics.

Other Forms of Communication. Individual suggestions to improve the flow of environmental information between the FMPC and the community included: either new or more personal contact with FMPC personnel, plant tours, use of the FMPC speakers bureau, and changes to the reading rooms to make them easier for people to use.

4.0 THE FMPC RI/FS COMMUNITY RELATIONS PROGRAM

4.1 Introduction

The goal of the Superfund process at the FMPC is to identify environmental problems and to recommend and implement CERCLA/SARA-required cleanup solutions. Parallel to this CERCLA/SARA-mandated RI/FS and removal actions activity, U.S. DOE is also focusing on other environmental efforts, including: (1) activities to satisfy requirements of NEPA and RCRA, and (2) a rechanneling of plant resources from production to environmental restoration. Collectively, these related environmental investigation, remediation, and restoration activities represent a major, visible effort to comply with applicable environmental laws and regulations -- a cornerstone of good community relations. In addition to demonstrating compliance, members of the community have asked U.S. DOE to demonstrate three other things to them: (1) that U.S. DOE deserves their trust; (2) that the contamination problems at the FMPC can be cleaned up; and (3) that U.S. DOE is pledged to doing the job that is necessary to clean up contamination at the FMPC. These sentiments have been expressed frequently by the community during interviews, at public meetings, in the media, and during informal contacts.

Consistent with these community sentiments, U.S. DOE will focus on communicating three major messages during the implementation of the FMPC RI/FS Community Relations Program. These messages are:

- Credibility/Trust: U.S. DOE is committed to sharing all relevant information with the public in an accurate and timely manner.
- Capability: The environmental problems at the FMPC are solvable. Technologies exist to identify and solve the majority of environmental problems at the FMPC.
- Commitment: U.S. DOE is committed to cleaning up the FMPC and the nearby environment.

With these major messages in mind, the following section describes a range of public information and involvement activities that are recommended to meet CERCLA/SARA requirements and the program objectives identified below. This section also explains how these activities address the community information needs identified in the preceding section.

4.2 Program Objectives

The FMPC has been designated a NPL site under Superfund, which brings with it certain requirements for informing and involving the public regarding environmental work at the site. The objectives listed below are consistent with community relations program objectives recommended

by U.S. EPA both in its guidance for Superfund sites, and during discussions between FMPC managers and U.S. EPA Superfund managers regarding community relations needs at the FMPC.

The RI/FS Community Relations Program for the FMPC is built upon the three mutually supportive objectives shown below. It is tailored to meet needs identified through the community assessment regarding the community's concerns, levels of current information, requests for further information, and preferences about how that information should be delivered. As such, it is designed to meet the community relations requirements and recommendations under CERCLA and SARA.

Objective 1: Ensure that interested parties are provided with information necessary to understand key issues and decisions at the FMPC

From the beginning, this has been the most basic aim of the FMPC Community Relations Program -- to provide residents with information they need in order to understand the FMPC RI/FS. In keeping with Secretary of Energy Watkins' recent initiatives, the thrust of the current public information effort is to maximize openness by providing the community with general and specific written information, and by seeking direct communication between appropriate technical experts and the interested community. This objective includes informing the public of events or planned actions in a timely manner at technical levels appropriate for each of the interested audiences.

Objective 2: Increase opportunities for the community to comment on and provide input into RI/FS and removal action decisions

Public participation relies heavily on access to relevant information; thus, the second objective flows directly out of the first -- to increase opportunities for the public to participate in the environmental decision-making process. The assumption is that the more the public can be brought into the formal CERCLA/SARA process, the less the community will feel the need to redress concerns outside this process. This effort encourages and expands the dialogue already developed between U.S. DOE and individual members of the community. It seeks to increase opportunities for the public to comment and provide input throughout the remedial process.

Objective 3: Identify, focus, and resolve conflict to the extent possible

The conflict management strategy for the FMPC is designed to define the issues, identify concerned parties, negotiate issues, and build on the dialogue developed during the public involvement activities undertaken as a part of the second objective. If this dialogue is successful, U.S. DOE will be able to anticipate and acknowledge differences of opinion and work with the interested parties to minimize certain conflicts that may arise out of those differences.

Activities recommended to meet these objectives and incorporate these concepts are identified in Subsection 4.3 of this plan.

4.3 Program Highlights

The activities that follow are designed to meet one or more of the FMPC RI/FS Community Relations Program objectives identified in Subsection 4.2. The activities are also designed to meet the range of community needs for technical and general information, in both oral and written form, and to respond to community requests for greater participation in the RI/FS and removal action process that are identified in Subsections 1.2 and 3.2.

Individual techniques will be utilized, as appropriate, to communicate with local residents about new issues (such as those identified in Subsection 3.5). For example, to announce and explain any future elevated levels of contaminants, telephone/personal contacts with key individuals may be made, press releases could inform the larger community, and explanations could be provided in the Cleanup Update.

RI/FS Community Meetings. At least three community meetings will be held each year to ensure that interested area residents have a routine public forum for expressing their views and getting answers to their questions. The meetings will be designed to meet the community's need for ease of access to information and for regular opportunities to discuss RI/FS and removal action progress and related issues with RI/FS and other environmental experts. In addition, public meetings will be scheduled to discuss and accept comment on major RI/FS documents, such as the draft FS report and the proposed plan for each operable unit as specified in the SARA agreement between U.S. EPA and U.S. DOE. (Refer to Table 4.2 for overall schedule information.) Depending on when these "milestones" are reached, one of the three regularly scheduled meetings might be scheduled to coincide with the need to hold a milestone public meeting. Availability sessions may be held in conjunction with public meetings, or they may be scheduled independently. Availability sessions are particularly useful for answering questions or explaining activities that may affect individuals differently (such as monitoring well results).

Advance notification of meetings and topics to be discussed will be given to persons on the FMPC mailing list, allowing interested community members adequate time to make arrangements to attend. Other potential meeting locations are identified in Appendix F. To ensure that each meeting fulfills public information and involvement needs, U.S. DOE will continue to solicit community input into planning future meetings and availability sessions. U.S. DOE will continue to coordinate these meetings with U.S. EPA and OEPA, who are invited to participate, along with other appropriate agencies, in these meetings. Each meeting will feature technical presentations, comments by U.S. DOE and the regulators, and opportunities for individuals or group spokespersons to make statements or ask questions. Meeting transcripts will be provided in reading rooms identified in Appendix A.

Response to Community Questions. U.S. DOE will continue to distribute comment cards at all community meetings as a vehicle for identifying community questions and concerns, and to provide answers in a timely, focused manner. The community's questions and comments are captured on

RI/FS comment cards distributed during RI/FS community meetings and at other community events. Responses will be made during the community event, such as a meeting, whenever possible. However, when additional data are needed to provide an answer, U.S. DOE will answer those questions in writing within a specified reasonable time, such as 30 days.

Telephone and Personal Contacts. U.S. DOE will continue to maintain frequent telephone and personal communication with local community leaders, residential and commercial plant neighbors, and other organizations. (Appendix C identifies such key contact persons.) Any of these persons, or others as appropriate, will be contacted in a timely fashion about significant events such as the issuance of a major RI/FS document, announced cleanup activity, recent RI and related findings, or unexpected releases of contaminants.

Cleanup Update. This is a new publication that U.S. DOE is designing to provide up-to-date information on new findings and site developments related to ongoing cleanup activities at the FMPC. It is intended to keep the community informed of timely information between the regularly scheduled public meetings. Consequently, it is expected to be published approximately six times a year. Its sole focus will be on information about CERCLA-related activities, and not general plant news as reported in the current FMPC Update.

Presentations and Briefings to Community Groups and Elected Officials. U.S. DOE will continue to provide briefings about the FMPC in general and about the RI/FS and removal actions in particular to Ross, Crosby, and Morgan township governments (see Appendix C for a list of township officials). Site tours and briefings are prepared to meet informational needs of area, state, and federal elected representatives. (Appendix E provides a list of current elected officials.) U.S. DOE also makes presentations to other units of local government and local organizations on request. For example, in November 1989, U.S. DOE began giving regular update briefings to the FRESH membership and in March 1990, U.S. DOE gave a groundwater presentation to the trustees of Miami Township, located downriver of the FMPC.

Community Roundtables. Informal opportunities also exist for small groups of community members to discuss a variety of FMPC issues, such as contaminated groundwater, with technical staff. The Community Roundtable program, initiated by WMCO in March 1990, is structured around the results of 800 questionnaires sent to persons on the FMPC mailing list. Community residents identified contaminated groundwater, cleanup progress at the FMPC, and hazardous waste at the FMPC as the three issues they would most like to discuss. Roundtable discussions will be held routinely, probably monthly, as long as community interest is maintained.

Workshops. Both the community assessment and public response to "availability sessions" that feature direct communication with RI/FS technical staff indicate a need for more informal communication. Workshops focusing on specific aspects of the RI/FS offer an opportunity to disseminate such detailed technical information while encouraging informal dialogue between U.S. DOE and the community. Topics will focus on known areas of community interest, such as risk assessments, removal actions, the south plume, the K-65 silos, or other areas of the RI/FS. Workshops will be developed and offered to small groups in the area on an as needed basis; e.g.,

to discuss each removal action and the alternatives available for each operaable unit. Each workshop may be held more than once, depending on need and proposed audience. DOE has committed to hold a workshop for each removal action EE/CA, during the public comment period.

Hotline. Events that alarm nearby residents -- such as fires in the area of the plant, the presence of RI/FS personnel in white coveralls, or the overflow of the outfall line at Manhole 180 -- have occurred near the FMPC site on weekends or after hours on weekdays. In some cases these events have been related to FMPC operations or cleanup activities, and in other cases they have not, but residents have not had a reliable way to confirm if there is cause for concern. In response, U.S. DOE is developing a set of protocols that will function as a 24-hour hotline for these types of questions. These protocols include:

- Providing a telephone number that can be used during normal FMPC business hours to call U.S. DOE's RI/FS Project Manager, A.P. (Andy) Avel -- 738-6161
- Disseminating the phone number for the plant's 24-hour security office to be used at all other times -- 738-6295
- Instructing all contractors to report: (1) their presence off-site to the security office on weekends and after hours on weekdays, and (2) any non-routine events
- Requiring all such hotline communications to be logged

These hotline phone numbers will be widely and frequently disseminated. Additional protocols will be developed as the need is identified. In addition, U.S. EPA has invited the public to call the U.S. EPA Region 5 toll-free hotline: 1-800-621-8431.

Reading Rooms. The information repository program began in 1985. The repositories, known locally as reading rooms, currently contain copies of technical reports, fact sheets, news releases, and briefings related to the RI/FS. Copies of all RI and FS reports will be available for public review also. The AR for each operable unit and for each removal action undertaken is located in two of the reading rooms. It documents comments received from the public and U.S. DOE's response to those comments. The materials in the reading rooms will be organized in such a way that the AR can be distinguished from other reading room materials.

Persons interviewed who had used the reading rooms mentioned difficulties in finding materials they were seeking. They made several suggestions for improving the reading rooms, including videotapes of relevant RI/FS information and improving the organization of the materials to make the rooms more "user friendly." The following features of the reading room program will be retained: the index of items will be updated monthly, monthly audits will be made, other relevant information will be provided, and users' logs will be maintained. Reading room locations are provided in Appendix A.

Administrative Record. U.S. DOE will inform the community about the availability of Administrative Record files maintained for each operable unit in the RI/FS and for each removal action undertaken. U.S. DOE also will notify the community of new additions to the AR, as well as the availability of major reports; Notices of Availability (NOA) will be published in a large-circulation newspaper. For public convenience and ease of access, there are two other local FMPC reading rooms, as identified in Appendix A.

RI/FS Fact Sheets and Other Materials. RI/FS materials focusing on specific topics will continue to be developed and distributed at RI/FS community meetings, placed in the reading rooms, and made available to community groups on request. Each individual fact sheet will be tailored to the community's information needs. Such fact sheets may focus on RI/FS vocabulary, opportunities for public participation in the RI/FS, and technical explanations of field sampling activities, feasibility study and removal action alternatives analyses, and risk assessments. When each preferred alternative is identified, the fact sheet to be developed and distributed will focus specifically on the proposed plan.

News Media Relations. Media briefings and press releases will continue to be used to announce community meetings and RI/FS program milestones. (A list of local media is provided in Appendix D.) In response to community requests to be informed as soon as possible of new findings or unanticipated events at the FMPC, press releases will also be issued to announce these types of findings and events in a timely manner. Press releases will ensure that not only the local community is kept informed, but the greater Cincinnati area as well. Attempts will be made to strengthen the rapport already established with local media contacts and to continue to supply reporters with information that will be useful for preparing their articles.

Speakers Bureau. The FMPC Speakers Bureau, which was designed to provide FMPC speakers for small-group meetings, will be continued. RI/FS staff and personnel supporting other environmental projects, such as removal actions and the EIS, will be available to assist in this ongoing FMPC effort.

Plant Tours and Open Houses. Plant tours for small groups will continue. These tours demonstrate cleanup activities planned, initiated, or completed on site. Open Houses will be held, as appropriate.

Videotape(s). Use of videotape(s) was a frequently mentioned suggestion as a means to improve information-sharing with the community. The prepared video concept is based on an 8-minute RI/FS videotape developed for the 1988 FMPC Open House, which was well received by the community. Video "stories" may be developed as appropriate, tied to key RI or FS milestones or topics that need special attention. The videotapes would be available for viewing in the reading rooms and possibly available for loan. The videotapes might also be used at community meetings, by the speakers bureau, or in a RI/FS or other FMPC exhibit.

Removal Action Community Relations Activities. Removal action community relations activities are part of the integrated community relations program designed to inform and involve the

community in the FMPC cleanup process. This program recognizes the fact that RI/FS community relations activities have much in common with community relations activities which support removal actions and that two community relations programs can be confusing to the community. Such activities include community meetings, public comment periods, community interviews, materials development and dissemination, documentation in the Administrative Record, and community relations plans. Removal actions will continue to be routinely discussed during RI/FS community meetings. Removal actions will also be included in the FMPC cleanup progress report. The AR established for each removal action will document public participation as well as any community relations plan that addresses specific removal action activity as well as relevant areas and activities addressed by this overall community relations plan. A generic schedule for removal action community relations is provided in Table 4.1.

EIS Public Participation. The procedures for integrating the EIS into the RI/FS, documented in the FMPC NEPA/CERCLA Integration Plan, include community involvement activities such as scoping meetings, public hearings, public comment periods, and responsiveness summaries.

To maximize the opportunity for both CERCLA/SARA and NEPA public involvement requirements to be met, NEPA activities are being integrated into the RI/FS Community Relations program. This integration is designed to provide an exchange of information, avoid duplication of public participation and scheduling efforts, and share resources in the preparation of public meetings and hearings. For example, the RI/FS Community Relations staff and the NEPA staff are cooperating to provide consistency in meeting approaches and optimal meeting scheduling. Also, the NEPA staff make presentations and answer questions at community meetings.

Public Notices. Public NOAs will be published in at least one local newspaper for each EE/CA proposed plan and ROD.

Public Comment Periods. Public comment periods will be held for each EE/CA, and for each draft feasibility study report, as part of the NEPA program, and when the proposed plan for each operable unit is announced. This effort is designed to aid the public in understanding each report and preparing comments. Each proposed plan that details U.S. DOE's preferred alternative will be distributed to the public. A notice will be published in local newspapers to announce each public comment period, the location(s) of the relevant Administrative Record, and any associated public meetings or hearings.

Responsiveness Summaries. Following completion of each public comment period for each operable unit and each removal action, a responsiveness summary will be prepared. The responsiveness summary will summarize the comments received during the comment period, as well as how U.S. DOE intends to incorporate, address, or respond to those comments. In particular, the responsiveness summary will explain any significant changes between the proposed plan and the final report.

Table 4.2 presents the estimated schedule for each activity identified in the Program Highlights.

TABLE 4.1
GENERIC TIMETABLE FOR COMMUNITY RELATIONS ACTIVITIES
FOR A NON-TIME CRITICAL REMOVAL ACTION

		Date(s)
1.	Establish Administrative Record File at all locations for the records of each removal action	prior to day 1
2.	Publish the Notice of Availability (NOA) of Administrative Record File in at least one major local newspaper.	prior to day 1
3.	Publish the NOA of EE/CA and associated public comment prior in at least one major local newspaper	Day 1
4.	Provide the EE/CA to all AR file locations	Day 1
5.	Provide a description of the removal action in the Cleanup Update.	Next Available Issue
6.	Provide a 30-day period for public comment on the EE/CA	Day 1 - Day 30
7.	Conduct an EE/CA workshop to discuss the EE/CA	Day 1 - Day 30
8.	Decide whether to extend public comment period if requested	Day 30
ORIGINAL PUBLIC COMMENT PERIOD		
9.	Develop responses to significant community concerns	Day 31 - Day 60
10.	Provide Responsiveness Summary to all AR file locations	Day 60

When a public comment period is extended, the Responsiveness Summary deadline will be extended by the same amount of days as the public comment period.

TABLE 4.2

FMPC RI/FS COMMUNITY RELATIONS PROGRAM HIGHLIGHTS

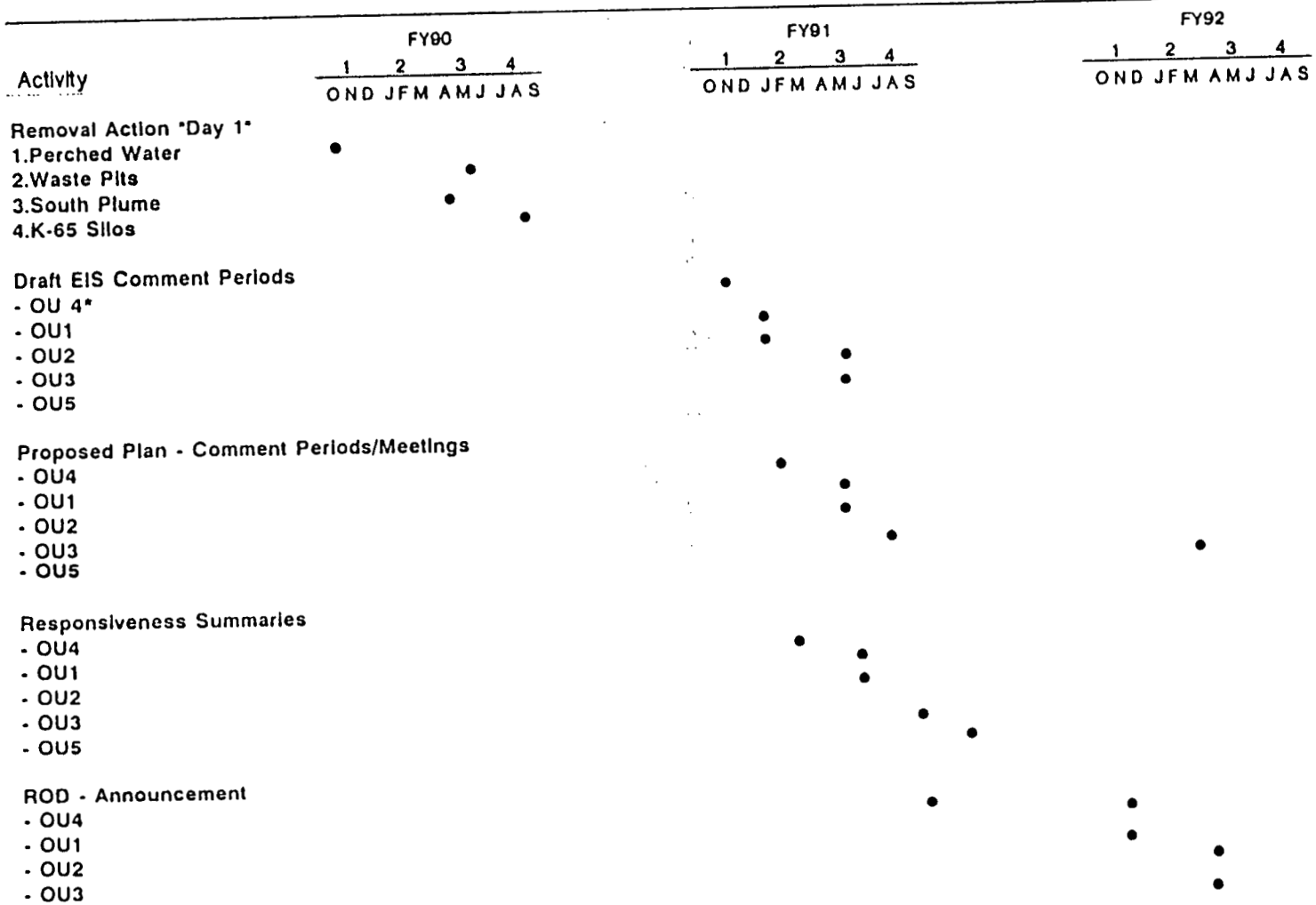
ESTIMATED SCHEDULE BY QUARTER

Activity	FY90				FY91				FY92			
	1	2	3	4	1	2	3	4	1	2	3	4
	OND	JFM	AMJ	JAS	OND	JFM	AMJ	JAS	OND	JFM	AMJ	JAS
RI/FS Community Meeting	•	•	•		•	•	•		•	•		
Responses to Questions	as requested											
Community Contacts	as needed											
RI/FS Progress Reports		•	•	•	•	•	•	•	•	•	•	
Presentations/Briefings	as requested											
Roundtables	monthly											
Workshops		•		•		•		•		•		
Hotline	on going											
Reading Rooms	on going											
Administrative Record	announce additions											
Fact Sheets	1/community meeting											
Press Releases	as needed											
Speakers Bureau	as requested											
Plant Tours	as requested											
Videotapes	as needed											
Public Notices	as needed											
EIS Scoping Meetings		•										

45

TABLE 4.2 (concluded)
FMPC RI/FS COMMUNITY RELATIONS PROGRAM HIGHLIGHTS

ESTIMATED SCHEDULE BY QUARTER



* "OU" signifies Operable Unit

4.4 Fulfilling the Conflict Management Objective

Rationale. The following approach to addressing the third objective of community relations, i.e., to focus and resolve conflict, builds on public information and involvement activities described in the previous subsection. The approach is designed to assist U.S. DOE to anticipate and resolve the types of conflicts that have been demonstrated to arise routinely during the investigation and remediation of hazardous and mixed waste contamination at federal facilities around the country. At other sites, such conflict has frequently led to congressional inquiries, lawsuits, the need to re-investigate or re-characterize site contamination, project delays, or the inability to reach or implement a Record of Decision. Some of these situations have already occurred at the FMPC.

Approach. The following four requirements form the basis for an effective conflict management approach for the FMPC:

1. Maintain complete openness in providing RI/FS, removal action, and related information.

2. Identify and eliminate potential sources of conflict that are avoidable, e.g., conflicts that are not based on the substance of the Superfund process, but rather on how the process is being conducted.

3. Identify unavoidable sources of conflict early in each step of the Superfund process so U.S. DOE, as lead agency, can address or mitigate these conflicts to the extent possible.

4. Establish a working relationship with the community, or representatives thereof, based on mutual trust and reciprocity.

Requirement 1. The activities identified in the previous subsection are designed to satisfy the first conflict management requirement. The variety of activities -- from fact sheets and progress reports to plant tours and community meetings -- will ensure that all information relevant to the RI/FS and removal actions will be made available to the public.

Requirement 2. Well-planned and well-implemented public information and involvement activities also contribute to the second requirement by avoiding conflict that is based on misinformation or public perceptions that the community has not been involved in the Superfund process. Timely responses by U.S. DOE to comment cards and other requests for information will also help avoid unnecessary conflict.

Requirement 3. Perhaps the greatest challenge in managing conflicts during the cleanup process is in identifying potential sources of conflict early enough so that they can be addressed or mitigated. By interacting directly with the community on a regular basis through face-to-face meetings, availability sessions, community roundtables, workshops, and telephone contacts, U.S.

DOE will ensure that it is kept apprised of the community's concerns and desires throughout this process. This routine feedback will enable U.S. DOE to identify potential sources of conflict in a timely manner. While the specific nature of these conflicts cannot be anticipated, U.S. DOE is committed to taking those actions that are both feasible and technically sound, to address or mitigate areas of conflict between the community and U.S. DOE with respect to the Superfund process. In particular, proposed plans, public comment periods, and responsiveness summaries will ensure that U.S. DOE obtains and responds to the public's input on a preferred remedial alternative before a decision is made.

Requirement 4. Finally, building a relationship with the community in which area residents become partners -- not adversaries -- in the decision-making process for remediation is the ultimate goal of a community relations program. This relationship can only be built, however, on mutual trust, credibility, and open sharing of information. U.S. DOE is committed to a community relations program that it believes will build and maintain this relationship.

4.5 RI/FS Program Contacts

In carrying out the FMPC's RI/FS Community Relations Program, certain key positions have been identified for overseeing and coordinating the activities described in this section. Appendix B identifies these persons and the current phone numbers of the individuals who hold them. The FMPC Cleanup Update will regularly identify these key individuals and how they can be reached so that changes in personnel can be reflected.

APPENDIX A

LOCATION AND HOURS OF FMPC READING ROOMS AND ADMINISTRATIVE RECORD FILES *

Location	Hours
Public Environmental Information Center* JAMTEK Building 10845 Hamilton-Cleves Highway Harrison, Ohio 45030 513-738-0164	Mon - Thurs: 9 am - 8 pm Tues, Wed, Fri: 9 am - 4:30 pm Sat: 9 am - 1 pm
The Main Public Library of Cincinnati and Hamilton County 800 Vine Street Cincinnati, OH 45202 513-369-6938	Mon - Fri: 9am - 9 pm Sat: 9 am - 6 pm
Harrison Branch Library 300 George Street Harrison, OH 45030 513-367-4728	Mon - Wed: 1 - 9 pm Thurs: 1 - 5:30 pm Fri, Sat: 9 am - 5:30 pm

* The Adminstrative Record is available only at this location as well as the U.S. EPA Region 5 Office:

U.S. EPA - Region 5, HR-12
230 S. Dearborn Avenue
Chicago, IL 60604
800-621-8431

APPENDIX B

LIST OF U.S. DOE, U.S. DOE CONTRACTOR, AND REGULATORY AGENCY CONTACTS

U.S. DOE/U.S. DOE CONTRACTORS AT THE FMPC

Contacts During Business Hours:

Andy Avel
Department of Energy RI/FS Manager
P. O. Box 398705
Cincinnati, OH 45239-8705
513-738-6161
(FAX) 513-738-6650

Susan Wolinsky
RI/FS Community Relations Task Leader
Advanced Sciences, Inc.
P. O. Box 475
Ross, OH 45061-0475
513-738-3100
(FAX) 513-738-3207

Pete Kelley
Community Relations Manager
Westinghouse Materials Company of Ohio
P. O. Box 398704
Cincinnati, OH 45239-8704
513-738-6644
(FAX) 513-738-6968

Evening and Weekend Contact:

FMPC Security 513-738-6295

U.S. EPA

U.S. EPA Hotline 800-621-8431

Catherine McCord
Remedial Project Manager
U.S. EPA - Region 5, HR-12
230 S. Dearborn Avenue
Chicago, IL 60604
312-886-1478
(FAX) 312-353-6775

Dan O'Riordan
Superfund Community Relations Section
U.S. EPA - Region 5, PA-14
230 S. Dearborn Avenue
Chicago, IL 60604
312-886-4359
(FAX) 312-353-1155

OHIO EPA

Ohio EPA, Southwest District Office
40 South Main Street
Dayton, OH 45402-2086

513-285-6357
(FAX) 513-285-6249

Graham Mitchell, Project Coordinator

Mike Starkey, Corrective Actions

Rich Bendula, Groundwater

Martyn Burt, Water Pollution Control

Paul Pardi, Hazardous Waste

Jim Crawford, Emergency Response

Dan Riestenberg, Emergency Response

Al Frank, Community Relations
Ohio EPA
1800 Watermark
Columbus, OH 43266

614-644-2160

Departments of Health

Ohio Department of Health 246 N. High Street Columbus, OH 43212	800-523-4439 614-481-3543
Robert Owen, Director Radiological Health Program 1224 Kinnear Road Columbus, OH 43212	614-644-2727
Hamilton County Health Department 138 E. Court Street, Room 707 Cincinnati, OH 45202	513-632-8451
Butler County Health Department Administration Building 130 High Street Hamilton, OH 45011	513-887-3111
Allan Blevens, Chief of Environmental Services	513-887-3120
Patricia Burg, Director of Administration	513-887-3098

APPENDIX C

LIST OF KEY COMMUNITY CONTACTS

TOWNSHIP GOVERNMENTS IN THE VICINITY OF THE FMPC

Crosby Township Trustees

Gary Storer, President
[redacted]

Warren E. Strunk
[redacted]

Jane Harper
[redacted]

Doris Turner, Clerk
[redacted]

Ross Township Trustees

Donald H. Thiem
[redacted]

David M. Young
[redacted]

Thomas Willsey, Jr.
[redacted]

Betty Brown, Clerk
[redacted]

Morgan Township Trustees

Robert Copeland [redacted]

Gary Colegate [redacted]

Karl Dillhoff [redacted]

Charlotte Lahmann, Clerk [redacted]

BUSINESSES LOCATED NEAR THE FMPC

Delta Steel Corp.
Daniel Baker, Controller
10860 Paddy's Run Road
Harrison, OH 45030
513-738-1232

Albright & Wilson, Inc.
Martin Laughlin, Plant Manager
Paddy's Run Road
Harrison, OH 45030
513-738-1261

Welch Sand & Gravel, Inc.
James R. Welch, Vice-President
11489 Hamilton-Cleves Highway
Harrison, OH 45030
513-738-3438

Dan Cornelius, Realtor
2647 Cincinnati-Brookville Road
P.O. Box 0146
Ross, OH 45061-0146
Business 513-738-8833
Resident 513-738-2563

Best Panel Homes
Carl Otte, Vice President
11301 Paddy's Run Road
Harrison, OH 45030
513-738-1212

Ruetgers-Nease Chemical Co., Inc.
Plant Manager
Paddy's Run Road
Harrison, OH 45030
513-738-1255

Schaefer Box & Pallet Co.
Stan Schaefer
11825 Paddy's Run Road
Harrison, OH 45030
513-738-2505

Knollman Farm, Inc.
2513 Willey Road
Harrison, OH 45030
513-738-1745

SCHOOLS

Ross Local Schools *

Jim Bischoff, Superintendent
3371 Hamilton-Cleves Road
Hamilton, OH 45013
513-863-1253

Elda Elementary
Cathy Jewett, Principal
3980 Hamilton-Cleves Road
Hamilton, OH 45013
513-738-1972

Morgan Elementary
Steve Miller, Principal
3427 Chapel Road
Hamilton, OH 45013
513-738-1986

Ross Middle School
Steve Kidd, Principal
3371 Hamilton-Cleves Road
Hamilton, OH 45013
513-863-1251

Ross High School
Dan Hare, Principal
3425 Hamilton-Cleves Road
Hamilton, OH 45013
513-863-1252

Southwest Local Schools

Errol S. Frank, Superintendent
230 South Elm Street
Harrison, OH 45030
513-367-4139

Crosby Elementary
Gregg Tracy, Principal
8382 New Haven Road
Harrison, OH 45030
513-738-1717

* Ross schools are located in or near Ross; however, they carry a Hamilton, Ohio mailing address.

FMPC NEIGHBORS AND KEY MEMBERS OF FRESH

Russell Beckner
[redacted]
(leave messages)

Vicky Dastillung, FRESH
[redacted]

Sandy Butterfield, FRESH
FMPC Environmental Safety &
Health Advisory Committee
[redacted]

Rev. Bob Long
[redacted]

Lisa Crawford
Spokesperson for FRESH
[redacted]

Gerda B. McFarland, FRESH
FMPC Environmental Safety &
Health Advisory Committee
[redacted]

APPENDIX D

MEDIA CONTACTS

WIRE SERVICES

Associated Press
John Nolan, Bureau Chief
617 Vine Street
Cincinnati, OH 45202
513-241-2386
FAX: 513-241-2665

United Press International
Rick Van Sant, Bureau Manager
125 E. Court Street
Cincinnati, OH 45202
513-721-0345

NEWSPAPERS

Cincinnati Post
Kerry Duke, Metro Editor
Al Salvato, Reporter
125 E. Court Street
Cincinnati, OH 45202
513-352-2706
FAX: 513-621-3962

Cincinnati Suburban Press
Western Division
Doug Hubbuch, Managing Editor
5505 Cheviot Road
Cincinnati, OH 45247
513-661-8352

Cincinnati Business Courier
Bryan Settle, Editor
1005 Carew Tower
Cincinnati, OH 45202
513-621-6665
FAX: 513-863-7988

Dayton Daily News
Jim Babcock
4th and Ludlow Sts
Dayton, OH 45401
513-225-2432
FAX: 513-225-2489

Cincinnati Enquirer
Kerry Klumpe, Metro Editor
Maryn McKenna, Reporter
617 Vine Street
Cincinnati, OH 45202
513-369-1951
FAX: 513-369-1813

Hamilton Journal-News
Ozzie Kleinas, Managing Editor
Joe Feiertag, Reporter
Court St. at Journal Square
Hamilton, OH 45012
513-863-8200
FAX: 513-863-7988

Whitewater Publications
Don Sintz, Editor
P.O. Box 38
Brookville, IN 47021
317-647-4221

Harrison Press
Clay Nielsen, Editor
307 Harrison Ave.
Harrison, OH 45030
513-367-4582

Harrison Record
Robert Hyle, Editor
613 Harrison Ave.
Harrison, OH 45030
513-367-0261

Register Publications
(Affiliate of Harrison Record)
Joe Awad, Editor
126 W. High St., P.O. Box 328
Lawrenceburg, IN 47025
812-537-0063

TELEVISION

WCPO-TV, Channel 9 (CBS Affiliate)
500 Central Avenue
Cincinnati, OH 45202
513-852-4072 (Newsroom)

WLWT-TV, Channel 5 (NBC Affiliate)
140 W. 9th Street
Cincinnati, OH 45202
513-352-5011 (Newsroom)
513-352-5000 (Switchboard)

WKRC-TV, Channel 12 (ABC Affiliate)
1906 Highland Avenue
Cincinnati, OH 45219
513-421-6872 (Newsroom)
513-651-1207 (Switchboard)

WXIX-TV, (Independent)
10490 Taconic Terrace
Cincinnati, OH 45215
513-772-1919 (Switchboard)

RADIO

WCKY-WWEZ FM
219 McFarland Street
Cincinnati, OH 45202
513-241-6565 (Switchboard)

WGUC FM
1223 Central Parkway
Cincinnati, OH 45214
513-475-4444

WKRC/WKRQ AM
1906 Highland Avenue
Cincinnati, OH 45202
513-721-6397 (Newsroom)
513-381-5000 (Switchboard)

WLW AM
3 E. 4th Street
Cincinnati, OH 45202
513-421-6397 (Newsline)
513-241-9597 (Switchboard)

WVXU FM (Xavier University)
3800 Victory Parkway
Cincinnati, OH 45207
513-745-3738
513-731-9898

WMOH AM
2081 Fairgrove Avenue
Hamilton, OH 45011
513-863-6501 (Newsroom)

APPENDIX E

SOUTHWESTERN OHIO AND SOUTHEASTERN INDIANA LEGISLATORS

U.S. SENATORS

Ohio

The Honorable John H. Glenn
Room 503
Hart Senate Office Building
Washington, D.C. 20510
202-224-3353
550 Main Street, Suite 10407
Cincinnati, OH 45202
513-684-3265

The Honorable Howard M. Metzenbaum
Room 140
Russell Senate Office Building
Washington, D.C. 20510
202-224-2315
Federal Office Building
Cincinnati, OH 45202
513-684-3894

Indiana

The Honorable Richard G. Lugar
Room 306
Hart Senate Office Building
Washington, D.C. 20510
202-224-4814
46 East Ohio Street, Room 447
Indianapolis, IN 46204
317-266-5555

The Honorable Daniel R. Coats
U. S. Senate
Washington, D.C. 20510
202-224-5623
46 East Ohio Street, Room 447
Indianapolis, IN 46204
317-226-5555

U.S. CONGRESSIONAL DELEGATION

Ohio

The Honorable Thomas A. Luken
Representative, Second District
Room 2368
Rayburn House Office Building
Washington, D.C. 20515
202-225-2216
602 Main Street, Room 712
Cincinnati, OH 45202
513-684-2723

The Honorable Donald E. "Buz" Lukens
Representative, Eighth District
The Cannon House Office Building
Washington, D.C. 20515
202-224-3121
646 High Street
Hamilton, OH 45011
513-895-5656

The Honorable Bob McEwen
Representative, Sixth District
Room 329
Cannon House Office Building
Washington, D.C. 20515
202-225-5705
301 North High Street
Hillsboro, OH 45133
513-393-4223

Indiana

The Honorable Lee H. Hamilton
Representative, Ninth District
Room 2187
Rayburn House Office Building
Washington, D.C. 20515
202-225-5315
1201 East 10th Street, Room 107
Jeffersonville, IN 47130
812-288-3999

STATE OF OHIO
Legislative Information
1-800-282-0253

The Honorable Richard F. Celeste
Governor, State of Ohio
State House
Columbus, OH 43266-0601
614-466-3555

Hamilton County - Senate

The Honorable Stanley J. Aronoff
President, Ohio Senate
State House
Columbus, OH 43215
614-466-5786
513-251-9433

The Honorable William F. Bowen
Senator, Ninth District
State House
Columbus, OH 43215
614-466-9737
513-961-5415

The Honorable Richard H. Finan
Assistant President Pro Tempore
of the Senate
State House
Columbus, OH 43215
614-466-9737
513-961-5415

Hamilton County - House

The Honorable Louis W. Blessing, Jr.
Assistant Minority Whip
Representative, Twenty-second District
State House
Columbus, OH 43215
614-466-8120
513-385-1234

The Honorable Jerome F. Luebbers
Representative, Twenty-first District
State House
Columbus, OH 43215
614-466-8068
513-241-0400

The Honorable William L. Mallory
Majority Floor Ldr., House of Rep.
State House
Columbus, OH 43215
614-466-8134
513-231-5331

The Honorable Jacquelyn K. O'Brien
Representative, Twenty-sixth District
State House
Columbus, OH 43215
614-466-7197
513-231-5331

Hamilton County - House

The Honorable Thomas A. Pottenger
Representative, Twentieth District
State House
Columbus, OH 43215
614-466-2715
513-621-0912

The Honorable L. Helen Rankin
Representative, Twenty-fifth District
State House
Columbus, OH 43215
614-466-5130
513-751-4122

The Honorable Terry M. Tranter
Representative, Twenty-fourth District
State House
Columbus,OH 43215
614-466-2591
513-621-9204

The Honorable Dale Van Vyven
Representative, Twenty-seventh District
State House
Columbus, OH 43215
614-466-8120
513-563-2541

Butler County - Senate and House

The Honorable Barry Levey
Senator, Fourth District
State House
Columbus, OH 43215
513-422-2001

The Honorable John A. Boehner
Representative, Fifty-seventh District
State House
Columbus, OH 43215
614-462-6711
513-779-1600

The Honorable Michael A. Fox
Representative, Fifty-sixth District
State House
Columbus, OH 43215
614-462-6721
513-896-1865

COUNTY COMMISSIONERS

Butler County Commissioners
Courtney E. Combs, President
Cale L. Logsdon
Henry Helton
Administration Building
130 High Street
Hamilton, OH 45011
513-887-3247

Hamilton County Commissioners
Sandra Beckwith, President
Joseph M. DeCourcy
Robert A. Taft, II
Administration Building
138 East Court Street, Room 603
Cincinnati, OH 45202
513-632-8222

APPENDIX F

LOCATIONS FOR PUBLIC MEETINGS

	under 25	25-75	over 75
Crosby Elementary School 8382 New Haven Road, Harrison, OH Dan Lawler, Principal 738-1717	X	X	
Ross High School 3425 Hamilton-Cleves Road, Ross, OH Dan Hare, Principal 863-1252	X	X	X
Stricker's Grove Rt. 128, Hamilton-Cleves Road, Ross, OH Ralph Stricker 738-3366 or 521-9747			X
Crosby Methodist Church 9091 Church Street, New Haven, OH Rev. Bob Long 738-5153	X	X	
Venice Presbyterian Church 4244 Layhigh Road, Ross, OH (with Session approval) 738-1317	X	X	
Advanced Sciences, Inc. 11003 Hamilton-Cleves Road, Ross, OH Receptionist 738-3100	X		
The Plantation 9660 Dry Fork Road Harrison, Ohio 45030 Dave Brock 367-5610		X	X