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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 FERNALD

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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
FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
FERNALD, OHIO

Prepared by:

U.S. DEPARTMENT OF ENERGY
Fernald Office

January 1992

DRAFT

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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's Fernald Environmental Management Project located near Fernald, Ohio. This issuance represents an updated revision to the August 1990 Community Relations Plan, as a portion of the overall RI/FS Work Plan.

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Appendix F: Locations for Public Meetings

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LIST OF ACRONYMS

AR	Administrative Record
ASI	Advanced Sciences, Inc.
CDC	Centers for Disease Control
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CRP	Community Relations Plan
DOE	Department of Energy (United States)
EE/CA	engineering evaluation/cost analysis
EIS	Environmental Impact Statement
ERDA	Energy Research and Development Administration
EPA	Environmental Protection Agency (United States)
ES&H	Environmental Safety & Health [Advisory Committee]
FCA	Federal Compliance Agreement
FFCA	Federal Facility Compliance Agreement
FEMP	Fernald Environmental Management Project
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
ODH	Ohio Department of Health
OEPA	Ohio Environmental Protection Agency
ORAU	Oak Ridge Associated Universities
OSHA	Occupational Health & Safety Act
OSWER	Office of Solid Waste and Emergency Response
PCB	polychlorinated biphenyl
PEIC	Public Environmental Information Center
PIE	Partnership in Education
PIO	Public Information Officer
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
USGS	U.S. Geological Survey
WEMCO	Westinghouse Environmental Management Company of Ohio
WMCO	Westinghouse Materials Company of Ohio

1.0 OVERVIEW

1.1 Introduction

The Feed Materials Production Center (FMPC), renamed on August 23, 1991 and hereinafter called the Fernald Environmental Management Project (FEMP), is a contractor-operated federal facility where pure uranium metals were produced for the U.S. Department of Energy (DOE) between 1951 and 1989. The FEMP site is located on 1050 acres in a rural area of Hamilton and Butler counties approximately 18 miles northwest of Cincinnati, Ohio. The production area is limited to an approximate 136-acre tract near the center of the FEMP site. The villages of Fernald, New Baltimore, Ross, New Haven, and Shandon are all located within a few miles of the plant.

This comprehensive Community Relations Plan (CRP) has been prepared to guide community relations activities of the DOE during its environmental studies at the FEMP, 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 1986 Federal Facility Compliance Agreement (FFCA) between DOE and the U.S. Environmental Protection Agency (EPA). This CRP follows the guidance in 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 FEMP have contributed to a more visible community interest in the plant. This CRP incorporates information gathered during the 1989 community assessment.

1.2 The FEMP Community Relations Program

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

- Distinct "communities" interested in FEMP cleanup issues

- The numerous parties engaged in conducting or overseeing the CERCLA-mandated remedial and removal actions and other environmental activities at the FEMP include 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 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 among the overlapping, and often confusing, array of regulatory programs carried out at the FEMP. Some of those programs, besides CERCLA and SARA already mentioned, are the Resource Conservation and Recovery Act (RCRA) and the National Environmental Policy Act (NEPA).

As a result, the community relations effort at the FEMP 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 information about site developments that a press release can accomplish. Similarly, frequent updates sent to citizens on the FEMP 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 community roundtables do. The most distinctive feature of the FEMP 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
- Community roundtables
- Fact sheets
- RI/FS progress reports
- Workshops
- Exhibits
- Administrative Record/Reading Room
- Community hotline
- FEMP Speakers Bureau
- Plant tours and Open Houses
- Videotapes
- Press releases
- Availability sessions
- 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 DOE as the FEMP site investigation and remediation continue.

1.2.1 RI/FS Required Community Relations Activities

Following are RI/FS community relations activities that are required under CERCLA/SARA and are identified in the Community Relations in Superfund -- A Handbook, (EPA/540/G-88/002).

- Community Interviews. At the beginning of the RI/FS, before RI field work begins, community interviews must be conducted with affected residents and community leaders to determine their level of interest in the site, major concerns and issues, and information needs.

- Community Relations Plan. Based upon the community interviews, a CRP must be prepared and should include a description of the site background, history of community involvement at the site; community relations strategies, a schedule of community relations activities, and a list of affected and interested groups and individuals.

- Information Repository and Administrative Record. SARA requires that an administrative record for selection of a response action be established at or near the facility at issue. EPA requires that an information repository be established at or near the site so that each item developed, received, published, or made available to the public is available for public inspection and copying at or near the facility at issue.

- Notification and Analysis of the Proposed Plan. SARA requires that the public be informed about the availability of the proposed plan with a notice in a major local newspaper of general circulation.

- Public Meetings. At least three public meetings should be held each year during the ongoing RI/FS. A transcript of the meeting must be made available to the public and must be part of the administrative record. These meetings may include exhibits showing maps, diagrams, or photographs accompanied by a brief text explaining the display and the purpose of the exhibit. Progress reports or fact sheets summarizing current or proposed activities of the cleanup program should be made available at these meetings.

- Public Comment Period. Public comment periods, usually consisting of 30 days, will be held for each RI/FS document and proposed plan to give the public the opportunity to comment on and provide input to technical decisions. During the 30-day period, a workshop could be held to improve the public's understanding of the issue by inviting technical experts to explain the problem and allow citizens to comment on the proposed response actions. This will enable agency staff to identify citizens' concerns when preparing the responsiveness summary.

- Responsiveness Summary. At the conclusion of the comment period, SARA and the NCP require that a response to significant comments be prepared and that it accompany the final remedial action plan, or other decision document.

- Addressing Significant Changes Prior to Adoption of Final Remedial Action Plan. Before preparing the Record of Decision (ROD), SARA requires the final selected remedy be analyzed against the alternatives described in the RI/FS and proposed plan, to determine whether any "significant changes" have been made. If significant changes have been made, this may require additional public involvement.

- Public Notice. Under SARA, the public must be informed through a public notice in a major local newspaper of general circulation when the proposed plan is issued and later when the final ROD is adopted.

- Revision to the Community Relations Plan. Prior to remedial design, the CRP must be revised, if necessary, to account for the needs and concerns of the community during remedial design and remedial action. Community interviews or other activities may be conducted to gather these concerns.

- Addressing Post-ROD Significant Changes. SARA requires an explanation of significant differences after the adoption of a final remedial action plan or ROD if any remedial action is taken, any enforcement action under Section 106 is taken, or any settlement or consent decree under Section 106 or Section 112 is entered into.

- Fact Sheet and Notice on the Remedial Engineering Design. Consistent with EPA's "Policy on CERCLA Compliance with Other Environmental Statutes," a fact sheet on the engineering design of the remedial action must be prepared and made available to the public prior to completion of the final engineering design. The public should be notified of the availability of the fact sheet. This may be accomplished through a general mailing of the fact sheet to all individuals on the site mailing list or by placing an ad in a local newspaper of general circulation.

1.2.2 Supplemental Community Relations Activities

Following are supplemental community relations activities in place at the FEMP.

- Interaction with FRESH. The FEMP community relations group cooperates with Fernald Residents for Environment, Safety, and Health (FRESH) by attending monthly meetings to provide status on issues, activities at the site, and answering questions; and by notifying FRESH leadership of events, issues at the site and providing courtesy notification before news releases are issued.

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- Media Relations Programs. DOE has a Public Information Officer (PIO) in the Fernald Office. News releases are distributed to a full range of media, from wire services and major daily newspapers to weekly community publications, all three major Cincinnati TV stations, and numerous radio outlets.

- Environmental Safety and Health (ES&H) Advisory Committee. Community relations personnel have been liaisons between FEMP and the ES&H Advisory Committee chairperson. This committee was disbanded as of October 1991 and will be replaced with a technical advisory committee per the Amended Consent Agreement.

- Community Roundtables. The Community Roundtable Program began in 1990; five roundtables were held that year. Based on the results of a community survey, a Roundtable schedule was developed. In 1991, a second survey was conducted to establish a new schedule. Six Roundtables were held from May through November.

- Speakers Bureau. The Speakers Bureau includes DOE and other FEMP contractor personnel who reached approximately 3000 people in 1990 and 2486 people in 1991. The Speakers Bureau will be expanded with additional emphasis on school visits. A new Speakers Bureau Brochure to notify the public about the availability of speakers will be published early in 1992.

- Plant Tours, Field Trips, and Open Houses. Plant tours and field trips are available to the public to explain the remediation efforts currently underway at FEMP. In September 1988 and September 1990, open houses were held for the public to tour FEMP. In 1987, a "Family Day" for site employees and their families was held. More than 2000 people attended each event.

- Partnership in Education (PIE). Under the PIE program, FEMP personnel provide after-school science programs to approximately 80 students. Four schools are participating in the 1991-92 school year: Crosby Elementary, Miamitown Elementary, Garfield Junior High, and Ross Middle School.

- Township Meetings. FEMP personnel regularly attend several local township meetings each month, providing written or oral reports on the status of FEMP activities and cleanup progress.

- Fernald Project Cleanup Report. RI/FS information is distributed in this report to keep the community abreast of specific environmental restoration and waste management activities on site. It is distributed prior to public meetings.

- Special Assistance Projects. FEMP personnel often assist with off-site emergencies, accidents, fires, etc., either as part of mutual aid pacts with nearby communications centers or simply as volunteers. As a result of a June 1990 tornado, DOE honored community requests to make off-site warning sirens available to signal approaching severe weather.

1.3 Plan Organization

The CRP contains the following sections:

- **Section 1.0, Overview,** describes the community relations program including the required activities and the supplemental activities. A procedure for adding CRP Addenda for removal actions is provided in Section 1.3.1.

- **Section 2.0, Site Background,** describes the FEMP site, 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 FEMP; 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: Location and Hours of FEMP Administrative Record and Reading Room
  Appendix B: List of DOE, 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
  Appendix G: Community Relations Plan Removal Action Addendum Outline

1.3.1 Procedure for Community Relations Plan Addenda

The activities at the FEMP are dynamic. As additional information is gained about the environmental contamination at the facility, plans of action are formulated and various responses are made. Some of these response actions are termed "removal actions." Removal actions are usually shorter in duration and less costly than full remedial actions. These removal actions have accompanying documentation which varies with the nature and extent of the environmental problem. As these projects are defined, the CRP will be updated with the use of an addendum

for each removal action. The requirements for updating the CRP are contained in the EPA guidance document, Community Relations in Superfund -- A Handbook.

The RI/FS CRP addenda will follow the outline contained in Appendix G. Once these addenda have been approved by DOE, they will be submitted to EPA for review/comment/approval. The approved addenda will be added to the documents available to the public in the Administrative Record (AR).

2.0 SITE BACKGROUND

This section describes the region in which the FEMP is located, identifies local population centers, and discusses the operative units of local government. In addition, a historical perspective is presented for the FEMP regarding the remedial investigation, feasibility study, RI/FS risk assessment, and the community relations program.

2.1 FEMP Description

The FEMP is bounded by Ohio Route 126 to the north, a transmission line to the east, Willey Road to the south, and Paddys Run Road and the Chesapeake and Ohio Railroad to the west, as shown in Figure 2-1. It occupies 1050 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 FEMP and identifies, among other areas, the former Production Area, the waste pits, and the K-65 silos. The map also shows how the storm-sewer outfall ditch flows into Paddys Run and how Paddys Run flows through the western portion of FEMP property.

The federally owned FEMP 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 FEMP is located, in accordance with the U.S. Constitution Article 1. An effort is underway by Hamilton County to collect $29 million in lieu of taxes for property removed from the tax rolls when the FEMP was established in 1951. A detailed description of the FEMP site is provided in Section 2.0 of the RI/FS Work Plan.

2.2 Description of Regional Area

The 1050-acre FEMP is located in the Great Miami River Valley approximately 18 miles northwest of Cincinnati in southwestern Ohio (Figure 2-1.) Although the two counties are generally urbanized, the area immediately surrounding the FEMP 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 FEMP. It is one of the largest parks in Hamilton County and is used primarily during the summer. Approximately 20 percent of the 2260-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 three mile radius.

Figure 2-1. Regional Location of the Fernald Environmental Management Project

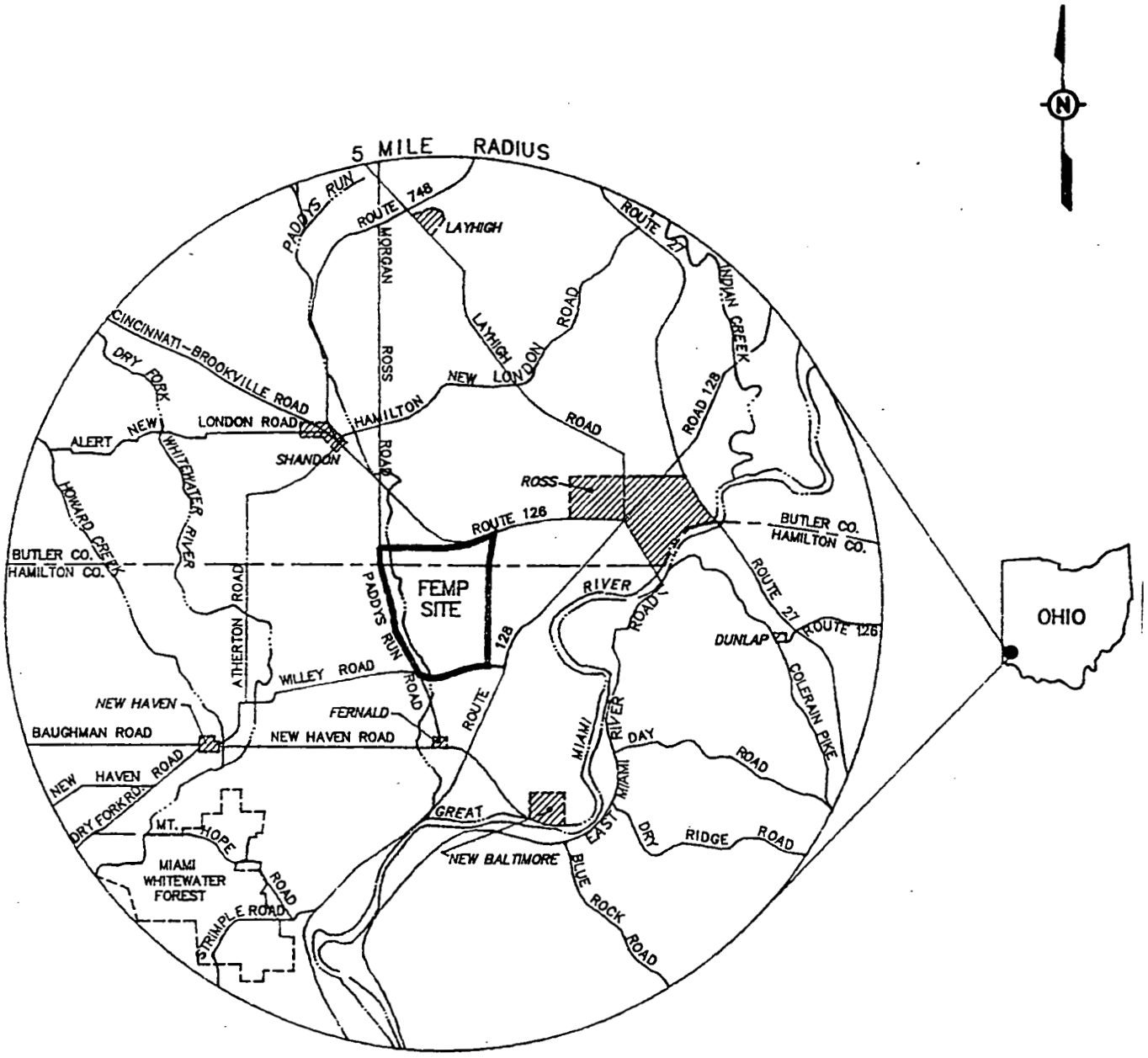
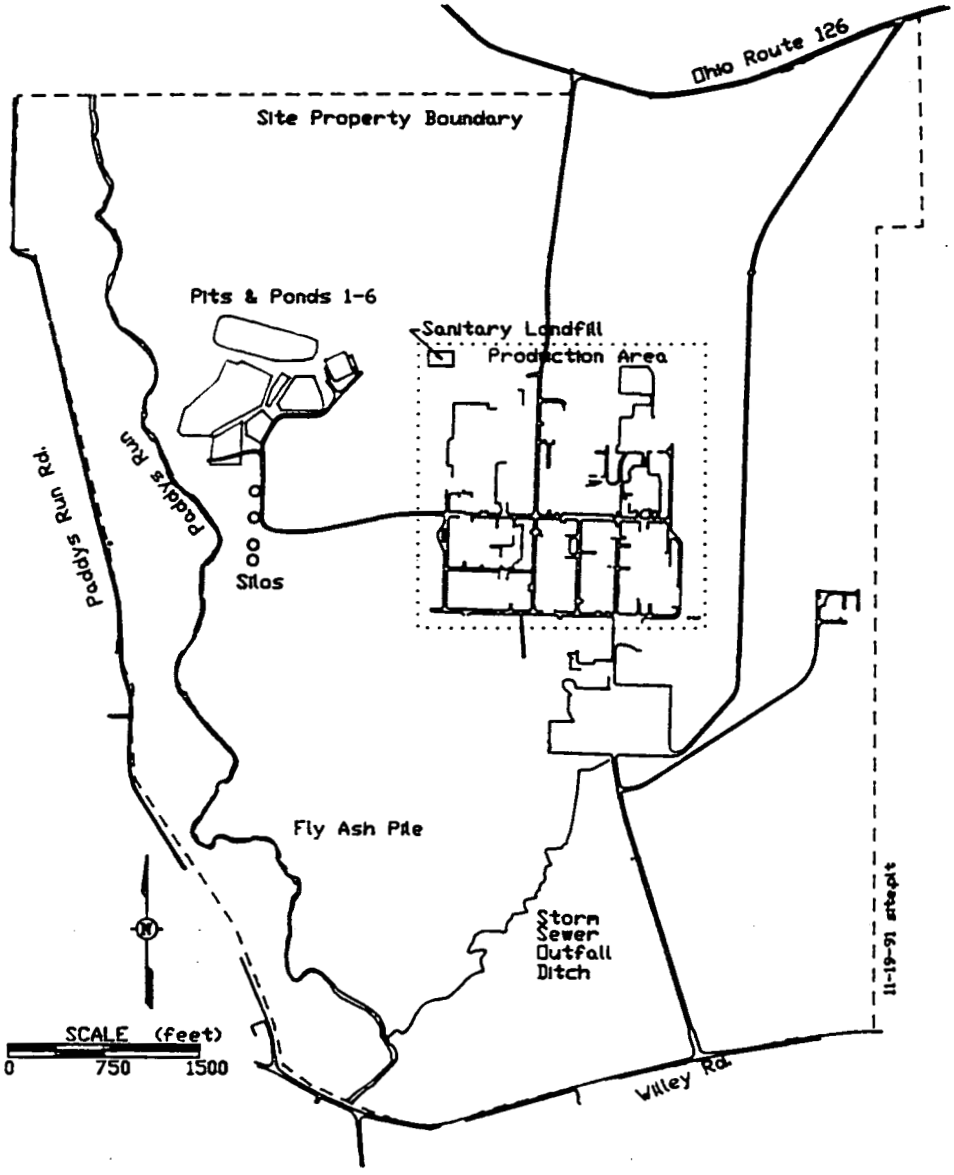


Figure 2-2. Simplified Site Map of the Fernald Environmental Management Project



2.3 FEMP History

Construction of the FEMP 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 DOE. From 1951 through 1985, the FEMP 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 FEMP. In 1991 Westinghouse renamed this subsidiary the Westinghouse Environmental Management Company of Ohio (WEMCO).

The original mission of the FEMP was production of high quality uranium products to be used in the production of nuclear weapons. In July 1989, the DOE decided to suspend production at the FEMP. The facility was placed in standby status, pending a final decision as to its future mission. In February 1991, DOE submitted a Closure Plan to Congress which would permanently stop production at the FEMP and focus on cleanup. After the 90-day response time had passed with no comments, the "plant closing" had become official. A ceremony marking the occasion was held at the site in August 1991 and a safe shutdown removal action work plan was developed in October 1991. At the ceremony, DOE renamed the facility and made a formal announcement that no more production would take place. The responsibility for DOE program management at the facility was transferred from the Defense Programs Office to the Office of Environmental Restoration and Waste Management. All current and future activities at the FEMP will further the cleanup of the facility.

Historically, various radionuclides have been discharged to the air, soil, and water, both on and off the FEMP property. 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 FEMP 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 by 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 FEMP. Preliminary RI/FS results indicate that these materials are not major environmental contaminants associated with the FEMP. However, known and potential releases of radionuclides, principally uranium, were significant enough for the FEMP to be placed on the NPL in 1989.

Public and Media Interest

Environmental issues at the FEMP 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 FEMP had been found to be contaminated with uranium in 1981. DOE held four community meetings in late 1984-early 1985 and confirmed that the FEMP was responsible for the contamination of

the off-site wells. The citizens group, FRESH, was formed by area residents in 1984, and has continued to monitor FEMP activities.

By 1985, 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 FEMP. Many of those improvement projects -- new dust-collector systems, improved storm water 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 canceled or put on hold due to the change in mission from production to cleanup and environmental restoration.

As public interest in the FEMP 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 FEMP's operations. (These reading rooms were closed in early 1992.) Both the EPA and Ohio EPA (OEPA) assumed active oversight responsibilities at the site, and WEMCO was selected as the new management and operating contractor, replacing NLO. Residents filed a $300 million class action suit against NLO (see Lawsuits in Section 2.3) 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 FEMP. The site appointed an Environmental Safety and Health Advisory Committee, comprised of technical experts from industry and prominent universities, FEMP neighbors, and environmental groups, which offered independent evaluations of activities at the site and communicated its findings with the media and the public via news releases or press conferences. The initial Advisory Committee was deactivated late in 1991 when a new type of advisory group was agreed to in the Amended Consent Agreement between EPA and DOE. Also in 1986, DOE held two scoping meetings on the then-proposed site-wide Renovation Environmental Impact Statement.

In **1987**, the FEMP 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 FEMP 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 DOE and EPA. In the meantime, environmental improvements were continuing at the FEMP, 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 national and international media attention again quickly focused on the FEMP 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 FEMP, closed because "adverse publicity reduced attendance" (quoting from their brochure). A local Girl Scout camp, Camp Ross, closed because "of concerns the Girl Scout Council had about the FEMP." In addition, a DOE study commonly referred to as the "2010 Report" recommended closure of the FEMP 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 ceased.

The year **1989** brought continued discussion and debate about the environmental and health effects of the FEMP, 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 FEMP and found no evidence of contamination beyond the three wells that had been identified several years earlier. In July 1989, WEMCO suspended all production at the FEMP to concentrate efforts on cleanup. A DOE "Tiger Team" arrived at the site shortly thereafter. The Tiger Team was chartered by DOE Secretary James Watkins to conduct an assessment of environmental compliance and other issues at the FEMP and other DOE facilities nationwide. The team subsequently issued a report detailing several areas in which the FEMP was not in compliance. Later in the year, the FEMP was designated an NPL cleanup site. As work on the RI/FS progressed, 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 into **1990**, additional monitoring wells were found to contain elevated levels of uranium. In spite of explanations that the new findings refined site characterization, plant neighbors expressed concern. Additional off-site wells with above-background levels of uranium were identified in a plume south of the FEMP. The DOE agreed to provide bottled water to homes with levels above 2.7 parts per billion (ppb) and to investigate an alternate water source. A study on a public water supply conducted by Hamilton County is now under review by DOE. WEMCO reported significant weight losses in drums of waste material which fall 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 FEMP became a public issue in the fall of 1984, focusing on RCRA waste on site. In 1985, the expiration of the FEMP'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 DOE. (In February 1990, a new NPDES permit was issued to the FEMP.) Earlier OEPA filed two lawsuits totaling more than $200 million, focusing on FEMP air and water releases, and resulting in state oversight of FEMP waste management.

Both OEPA and the ODH have tested groundwater from wells near the FEMP, finding three wells and one cistern with elevated levels of uranium. The state and DOE were involved in a dispute about state oversight of the FEMP 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, safety, and environmental record. Governor Celeste joined the committee for a site tour and a meeting with area residents.

The EPA became more active in the FEMP 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, EPA charged WEMCO with $350,000 in environmental fines, one month after naming the site to the NPL. In December 1989, a new cleanup agreement between EPA and DOE had been negotiated; it was signed April 9, 1990.

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

Lawsuits

In 1985, area residents filed a class-action lawsuit seeking damages for emotional stress and decreased property values. The suit was settled after a summary trial in 1989, with DOE agreeing to pay $78 million -- $73 million for health monitoring and $5 million to local property owners. DOE paid the first installment in March 1990 with the balance due by the end of 1991. Plant employees and five unions filed a $500 million class action lawsuit against NLO in early 1990 for lifetime medical monitoring for workers and compensation for lost income, difficulty in securing other jobs, and emotional distress. The trial began in September 1991 and focused only on whether the suit was filed after the statute of limitations ran out. The court dismissed the claims of six out of 10 plaintiffs. The trial for the remaining plaintiffs will be held next year. 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 FEMP RI/FS resulted from the FFCA that DOE and EPA signed on July 18, 1986. The FFCA ensured that environmental impacts associated with the FEMP would be thoroughly and adequately investigated so that appropriate remedial response actions could be formulated, assessed, and implemented. DOE and EPA have modified the FFCA several times since 1986. By 1990, a CERCLA Consent Agreement that includes SARA-mandated activity had been negotiated and was signed April 9, 1990. This Consent Agreement was modified pursuant to a dispute resolution agreement between EPA and DOE. The negotiations to amend the consent agreement began on May 13, 1991. After four months of negotiations, an Amended Consent Agreement was signed September 20, 1991.

In response to the original FFCA, a site-wide RI/FS was initiated pursuant to CERCLA. A work plan for the site-wide RI/FS was originally issued to EPA in December 1986. 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, DOE submitted a revised RI/FS Work Plan in March 1988 and received EPA approval in May 1988.

A proposed modification to the site-wide 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 FEMP into six distinct operable units into which all areas requiring cleanup

could be categorized. As part of the April 1990 Consent Agreement between DOE and EPA, this number was revised to five operable units. All succeeding references will be to five operable 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 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 FEMP. 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. Under the September 1991 Amended Consent Agreement, a comprehensive site-wide operable unit will be established and will consist of Operable Units 1 through 5. The purpose is to guarantee that the response actions selected for each of the five operable units protect human health and the environment throughout the entire site.

RI findings have confirmed elevated levels of uranium in groundwater both on and off property. RI studies have confirmed the nature and extent of contamination in each operable unit as follows:

- **Operable Unit 1 - Waste Pit Area.** Elevated levels of uranium have been found in the waste storage area. Studies to date have shown that storm water runoff has served as a vehicle to transport this contamination to Paddys Run, which in turn has contributed to contamination of the Great Miami Aquifer (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 - Other Waste Units.** Monitoring wells in the Southfield (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.

TABLE 2-1
FEMP OPERABLE UNITS

Operable Unit 1 -- Waste Pit Area

Waste Pits 1-6, Clearwell, burn pit, berms, liners and soil within the operable unit boundary as approved in the RI/FS Work Plan Addendum.

Operable Unit 2 -- Other Waste Units

Fly ash piles, other Southfield disposal areas, lime sludge ponds, solid waste landfill, berms, liners, and soil within the operable unit boundary as approved in the RI/FS Work Plan Addendum.

Operable Unit 3 -- Production Area

Production area and production-associated facilities and equipment (all above- and below-grade improvements) including, but not limited to, all structures, equipment, utilities, drums, tanks, solid waste, waste product, thorium, effluent lines, K-65 transfer line, wastewater treatment facilities, scrap metal piles, feedstocks, and coal pile.

Operable Unit 4 -- Silos 1-4

Silos 1, 2, 3, and 4, berms, decant tank system, and soil within the operable unit boundary as approved in the RI/FS Work Plan Addendum.

Operable Unit 5 -- Environmental Media

Groundwater, surface water, soil not included in the definitions of Operable Units 1-4, sediments, flora, and fauna.

Comprehensive Site-Wide Operable Unit

An evaluation of remedies selected for Operable Units 1-5 above, (including remedial and removal actions) to ensure that they are protective of human health and the environment on a site-wide basis, as required by CERCLA, the NCP and applicable EPA policy and guidance.

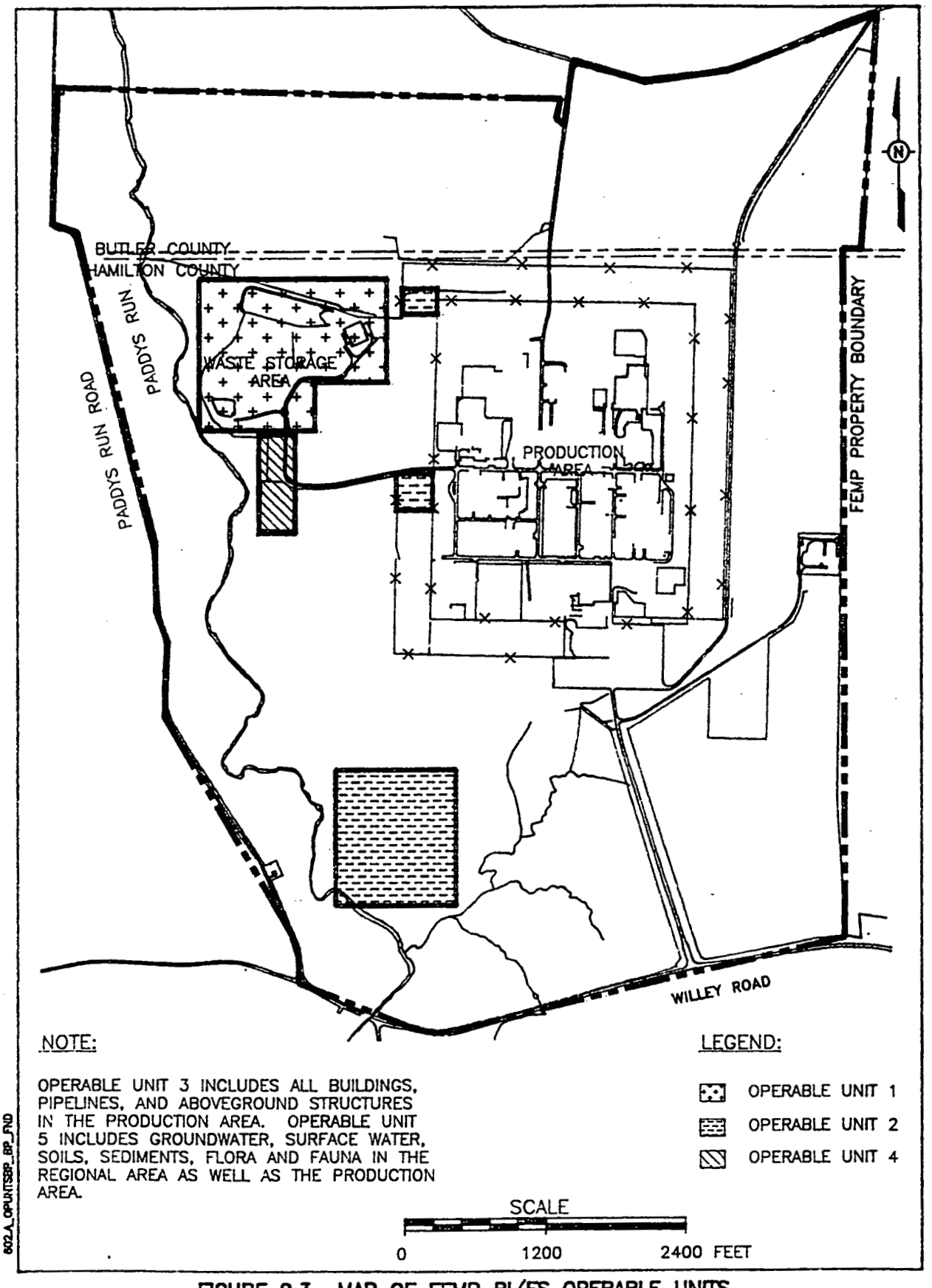


FIGURE 2.3 MAP OF FEMP RI/FS OPERABLE UNITS

- **Operable Unit 3 - Production Area.** 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 additional pockets of contaminated water near Plant 8, Plant 9, and Plant 2/3. This water is also being extracted and treated in FEMP treatment facilities prior to discharge to the Great Miami River. 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.

- **Operable Unit 4 - Silos 1-4.** 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. A removal action was conducted late in 1991 on Silos 1 and 2. The surface area of the K-65 Silos' contents was determined by using cameras and lasers in a process called surface mapping. In November 1991, after the mapping was completed, bentonite clay was applied over the silo residues to reduce radon levels and to provide protection from releases to the environment in the event of silo dome collapse.

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

All five operable units are proceeding according to the Amended Consent Agreement schedules. The public will be invited to comment on the proposed plan for each operable unit. Submittal schedules are shown in Table 2-2. A baseline 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, EPA will issue a 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 AR. After detailed engineering design for the alternative selected in the ROD is complete, final cleanup (or remediation) can begin.

TABLE 2-2
PRIMARY REPORT AND DRAFT ROD DATES FOR RI/FS OPERABLE UNITS PER CERCLA AMENDED CONSENT AGREEMENT (SIGNED SEPTEMBER 20, 1991)

SCHEDULE OF REMEDIATION ACTIVITIES

Operable Unit	1	2	3	4	5
Initial Screening of Alternatives	1/04/91	4/18/91	3/28/95	10/24/90	4/16/93
RI Report/ Baseline Risk Assessment	10/12/93	10/19/92	3/13/96	4/19/93	6/24/94
Feasibility Study/ Proposed Plan	3/07/94	3/15/93	8/07/96	9/10/93	11/16/94
Record of Decision	12/06/94	12/10/93	5/02/97	6/10/94	8/02/95

2.5 Removal Action History and Status

Major environmental studies, such as the RI/FS underway at the FEMP, 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 Section 2.6 for a discussion of the FEMP AR).

Removal actions may be identified at any time during the RI, the FS, and remedial activities. Removal action procedures, schedules and documentation are dictated by the NCP and the Office of Solid Waste and Emergency Response (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."

DOE has adopted a comprehensive community relations strategy for all removal actions and integrated their activities into the community relations program designed to inform and involve the community with respect to RI/FS activities at the FEMP. 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 FEMP AR, and responsiveness summaries. Removal actions are discussed routinely during RI/FS community meetings, and updates are given in the Fernald Project Cleanup 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 Runoff 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. Some removal actions already completed are Silos 1 and 2, and the K-65 Decant Sump Tank. These were incorporated into the RI/FS CRP as Addenda B and C, respectively. 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 last longer than 120 days, as was discussed in Section 1.3.1.

The 1990 Consent Agreement required that DOE perform four removal actions; they are briefly described below:

- Removal Action 1: Removal of contaminated water beneath FEMP 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 FEMP treatment systems. Since then, pumping had been suspended after volatile organic materials were detected in the groundwater. Reports on this removal action are included in the AR. Appropriate work plans were developed for ongoing sampling 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 storm water runoff 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 storm water runoff from this area. An EE/CA which identifies a removal action strategy for this area was submitted to 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 FEMP property – The south plume 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 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 Silos 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 workshop on the EE/CA was held on August 16 and the public comment period lasted from August 1 - 30, 1990. 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 developed a probability risk assessment concerning the likelihood and consequences of failure of the silos. This removal action was discussed during community meetings in 1989, 1990, and 1991.

The 1990 Consent Agreement also provided a means for identifying other necessary removal actions. As a result of additional characterization of the facility, three more removal actions were proposed, for a total of seven. When the DOE and EPA signed the Amended Consent Agreement in September 1991, it listed 11 additional removal actions for the FEMP and provided for the identification and implementation of further removal actions. Those identified in the 1990 Consent Agreement have been designated Phase One Removal Actions; the 1991 Amended Consent Agreement contains designated Phase Two Removal Actions, and any more will be designated Phase Three Removal Actions. All are listed in Table 2-3.

Table 2-3
FEMP REMOVAL ACTIONS

Phase One Removal Actions:

1. Contaminated Water Under FEMP Buildings
2. Waste Pit Area Runoff Control
3. South Groundwater Contamination Plume
4. Silos 1 and 2
5. K-65 Decant Sump Tank
6. Waste Pit 6 Residues
7. Plant 1 Pad Continuing Release

Phase Two Removal Actions:

8. Inactive Fly Ash Pile Control
9. Removal of Waste Inventories
10. Active Fly Ash Pile Controls
11. Pit 5 Experimental Treatment Facility
12. Safe Shutdown
13. Plant 1 Ore Silos
14. Contaminated Soils Adjacent to Sewage Treatment Plant Incinerator
15. Scrap Metal Piles
16. Collect Uncontrolled Production Area Runoff - Northeast
17. Improved Storage of Soil and Debris
18. Control Exposed Material in Pit 5

On or before January 15, 1992, DOE will identify and submit a list of additional removal actions and a schedule for submitting work plans. This group of removal actions will be referred to as Phase III. This list will be revised on an annual basis.

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 has been created and will be maintained by the lead agency (DOE), and made available to the public in a timely manner. This AR file is required by CERCLA, the NCP (40CFR300.800 Subpart I), and the terms of the FFCA between DOE and EPA. Procedures for FEMP AR establishment and maintenance were 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 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 postscreening investigation work plan, treatability studies, sampling and data results, and a summary of public comment received and DOE response to those comments.

The FFCA specifies a local AR location, in addition to the EPA Region 5 office in Chicago (see Appendix A). Late in 1990, the DOE established a Public Environmental Information Center (PEIC) to house the AR and provide convenient public access to documents about cleanup activities at the FEMP. It is located in the IAMTEK Building at 10845 Hamilton-Cleves Road (about one mile south of the FEMP). The AR contains historical documents and all other documents used to make decisions in the FEMP's long-range cleanup program. As new documents are added to the AR, the public is informed through notices published in local newspapers.

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 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 DOE and EPA identify.

2.7 Environmental Impact Statement History and Status

The FEMP is under the authority of DOE policy and guidance. It is the expressed policy of the DOE as contained in DOE Order 5400.4, CERCLA Implementation, that documents prepared in compliance with requirements at all CERCLA sites will also comply with the requirements of the 1970 NEPA. The current guidance directs that NEPA requirements be integrated with CERCLA documents to minimize paperwork and cost of project documents. The FEMP is preparing an environmental impact statement (EIS) to support cleanup activities at the FEMP. The RI/FS-EIS, as it is known, will address the socioeconomic, environmental and cumulative impacts of proposed remedial actions at the FEMP. The RI/FS-EIS will be contained within the Operable Unit 2 Remedial Investigation (RI) and Feasibility Study (FS) reports. Per NEPA regulations, each subsequent operable unit RI and FS report will contain NEPA language specific to that operable unit. They will also reference the Operable Unit 2 reports to reduce paperwork and duplication of effort.

The FEMP NEPA-CERCLA Integration Plan, finalized in early 1990, defines the FEMP 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 FEMP. 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 EIS 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 FEMP RI/FS.

3.0 COMMUNITY BACKGROUND

This section of the FEMP RI/FS CRP describes the affected communities and how they would obtain information about the FEMP; their attitudes, concerns, and basic information needs, and discusses their involvement with FEMP environmental efforts. All statements presented in this section are based on the community assessment performed in 1989, as well as on subsequent 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 exhaustive or representative of all community members.

3.1 Population and Units of Local Government

The combined population of Hamilton and Butler counties is 1,157,707. Hamilton County supports a population of about 866,228, while Butler County has a population of 291,479 ("Ohio Population by Governmental Unit, 1980-1990", Ohio Data Users Center Department of Development in conjunction with the U.S. Bureau of the Census, Columbus, Ohio, February 1991.)

Most of the communities surrounding the FEMP are unincorporated towns varying from an estimated population of 39 in Fernald to approximately 3000 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 FEMP is located. There are three township governments within two counties in the immediate vicinity: Ross and Morgan townships in Butler County; Crosby Township in Hamilton County. Representatives of township government participate in emergency preparedness activities at the FEMP, receive regular reports about FEMP activities from FEMP 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 FEMP. Communities located in the vicinity of the FEMP are identified.

There are no hospitals or retirement homes within five miles of the FEMP. The closest such facilities are located in the cities of Hamilton and Cincinnati. The nearest public schools are located approximately 1 to 2 miles from the FEMP. 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 FEMP neighbors and other persons interested in environmental activities (including the RI/FS) at the FEMP. The community can be differentiated by two dimensions: geography and the level of interest in technical information concerning the FEMP.

TABLE 3-1
POPULATION STATISTICS FOR SOUTHWESTERN OHIO

TOWNSHIP (including unincorporated communities)	POPULATION
Ross Township	6,383
Millville	
Ross	
Shandon	
Crosby Township	2,665
New Baltimore	
Fernald	
New Haven	
West Crosby	
Morgan Township	4,972
Okeana	
INCORPORATED COMMUNITIES	
City of Harrison	7,518
City of Hamilton	61,368

Note: 1990 population data have not been published for small communities.

Source: "Ohio Population by Governmental Unit, 1980-1990", Ohio Data Users Center Department of Development in conjunction with the U.S. Bureau of the Census, Columbus, Ohio, February 1991.

TABLE 3-2
PUBLIC SCHOOLS LOCATED IN THE VICINITY OF THE FEMP

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 five-mile radius of the FEMP, 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 FEMP directly affects community preferences about the types and immediacy of information received about environmental issues at the FEMP. Here are two examples obtained from the 1989 Community Assessment:

- Persons living close to the FEMP 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 FEMP expressed more interest in broader-scope issues.

Proximity to the FEMP also affects public attendance at community meetings. The majority of persons who regularly attend RI/FS meetings live in the vicinity of the FEMP. This is confirmed by those who ask questions at the meetings and by the addresses on the comment cards submitted to DOE.

Information Complexity

From an information-needs perspective, the affected community is represented by individuals who require basic information concerning the FEMP's mission and current status, to those who request detailed information concerning all aspects of FEMP activities and relevant national policy. Community interviews (described in Section 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 FEMP 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 FEMP

Before 1984, community involvement with the FEMP was minimal. Identification and disclosure of contamination at the FEMP in 1984 significantly increased the FEMP's profile in the community. The FEMP 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 FEMP's operations on the health of FEMP workers and plant neighbors -- questions that were not immediately answerable. In 1985, plant neighbors had filed a class action suit seeking damages from the FEMP for stress and for decreased property values, which further clouded relationships between DOE and community residents. In 1985 DOE instructed NLO to employ a public information officer and to initiate a public information and community relations function.

The RI/FS, begun in 1986, started to provide answers to many of the community's questions about the type and extent of FEMP 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 FEMP 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.

- 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, 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 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. (Appendix A provides the location, telephone number and hours.) 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 and closed in early 1992.

- 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 FEMP. National media attention was prevalent in the fall of 1988 and again in late 1989-early 1990, with articles about the FEMP and the entire 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 FEMP emergency preparedness program designed to respond to a plant emergency. This program includes routine cooperation with local government officials, an emergency-warning siren system that is used to alert FEMP neighbors in the event of a FEMP emergency or of approaching severe weather, emergency drills, and an ongoing community information program. The 1989 Community Assessment (see Section 3.4) revealed that individuals involved in this emergency preparedness network tend to be well-informed about the FEMP and related environmental studies.

- The FEMP Environmental Safety and Health Advisory Committee was created as an advisory group in 1985 to review FEMP activities. The committee consisted of environmental experts from industry and prominent universities, as well as concerned citizens and environmental activist groups. Its first priority was to ensure that the emergency siren system was installed and fully operational and to review both environmental and safety-related issues at the FEMP. The last Environmental Safety and Health Advisory Committee meeting was held in August 1991. The committee was deactivated in October 1991 and will be superseded by a new technical support group as part of the Amended Consent Agreement between EPA and DOE. The new group will be composed of technical experts from EPA and DOE and mutually agreed upon independent experts representing organizations or interests external to the two Federal agencies.

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

- The FMPC Update began publication in 1987 and was the primary communications tool with the local community until regular public meetings began to be held in 1989. The FMPC Update was renamed Fernald Project Update, and is issued on an "as needed" basis (approximately four times a year), and distributed to nearly 900 persons who asked to be on the FEMP mailing list. The Fernald Project Update covers a wide range of FEMP activities and recently has given more attention to RI/FS topics, although this is not its primary focus. A separate publication was started in 1990 to deal exclusively with RI/FS-related activities; after two issues, the Cleanup Update was absorbed in the Fernald Project Cleanup Report.

- In September 1988, an 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. A similar open house was held in 1990 which featured even more exhibits and was attended by more than 2000 people.

- For the past three years, regular community meetings have been 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 PEIC. Area residents submit comment cards during or following these meetings; most ask to be added to the RI/FS mailing list. DOE responds to all queries needing follow-up in writing, on the telephone, or in person.

- Each year hundreds of people tour the plant and numerous others get information from a comprehensive community relations program that includes PIE, Speakers Bureau, and regular reports at community meetings.

- A series of community roundtables was initiated in 1990 to discuss a wide range of FEMP issues with area residents. These roundtables are typically informal and small in nature. Roundtables are held frequently, at least six per year.

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 DOE:

- Property values
- Communication between DOE and the local community
- Long-term health effects of the FEMP on the surrounding population

To expand and update this information, 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 FEMP, the environmental issues raised by the RI/FS, and public involvement with the site. These two assessments are described briefly below.

<u>1986 Community Assessment</u>

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 FEMP
- Threats to drinking water
- Potential for increased rates of cancer

1989 Community Assessment

To update 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 FEMP included:

- Plant neighbors, many of whom lived near the FEMP for 10 years or more
- School administrators
- Former plant workers
- Parents with children (young or grown) who live near the FEMP
- Persons who live near the FEMP 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 FEMP 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 FEMP 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 FEMP, 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 FEMP and its environmental activities. The public preferences expressed during the interviews provide the basis for many of the community relations activities specified in the CRP.

Many persons interviewed expressed distrust of information provided by 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 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 FEMP previously operated, the technical complexity of information about plant operations and the environmental consequences, and DOE's credibility problem discussed in Section 4.0.

The local community has many concerns about the FEMP 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 FEMP 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 FEMP 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 FEMP. 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 FEMP 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 FEMP as the cause of their illness.

The Effect of the FEMP 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 FEMP 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 FEMP. 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 FEMP has contaminated local water supplies and the air. Concern about environmental contamination, while not unfounded, was generalized; few interviewees provided specifics.

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 DOE's cleanup plans for a non-operational facility. Many persons expressed the fear that DOE would not clean up the plant if the FEMP 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 FEMP.** 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 FEMP to safely store the material and waste indefinitely?

- **The effect of the FEMP 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 FEMP 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 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 FEMP

- Biological issues -- studies conducted independently of the RI/FS on how uranium enters the food chain through meat or milk

- Storm water runoff
- Quality of groundwater
- Identification of materials stored on site (now and in the past) and uranium processing performed at the FEMP
- 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, FEMP investigations conducted by 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 DOE and 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 WEMCO's plant operation and maintenance contract.

Community Information Sources

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

Direct Contact. Direct contact with the FEMP occurs most often at the RI/FS community meetings. Area residents have also been in contact through plant tours, the emergency preparedness programs, FRESH meetings, township trustee meetings, Speakers Bureau Programs, and the Coordinating and Planning Committee.

The Local Media. Newspapers include the Cincinnati Enquirer, the Cincinnati Post, the Hamilton Journal-News, and the Harrison Press. All metropolitan Cincinnati television stations were named as information sources. Radio stations WKRC, WLW, and WCKY call the FEMP 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."

FEMP Publications. Publications identified by interviewees as sources of information about the plant included the FMPC Update, now called the Fernald Project Update) and the Environmental Monitoring Report, now called the Annual Environmental Report.

Word of Mouth. Persons interviewed indicated that they tend to listen to what their neighbors and friends say about the FEMP. Among those "neighbors and friends" identified by interviewees were current and former FEMP workers.

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 FEMP in February 1989. Only occasionally do persons who attend FEMP community meetings identify themselves as members of these groups.

One local citizen activist group, FRESH, was identified as a source of information about the FEMP 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 FEMP records. Some residents contacted agencies such as 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 DOE to pursue. The following summary, based on these interviews, suggests how the community members might like to receive future information about the FEMP's environmental activities.

Publications. Interviewees were most interested in receiving or continuing to receive written information about the FEMP 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 FEMP and the community included: either new or more personal contact with FEMP personnel, plant tours, use of the FEMP speakers bureau, and changes to the reading rooms to make them easier for people to use.

4.0 THE FEMP RI/FS COMMUNITY RELATIONS PROGRAM

4.1 Introduction

The goal of the Superfund process at the FEMP 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, 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 DOE to demonstrate three other things to them: (1) that DOE deserves their trust; (2) that the contamination problems at the FEMP can be cleaned up; and (3) that DOE is pledged to doing the job that is necessary to clean up contamination at the FEMP. 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, DOE will focus on communicating three major messages during the implementation of the FEMP RI/FS Community Relations Program. These messages are:

- Credibility/Trust: DOE is committed to sharing all relevant information with the public in an accurate and timely manner.

- Capability: The environmental problems at the FEMP are solvable. Technologies exist to identify and solve the majority of environmental problems at the FEMP.

- Commitment: DOE is committed to cleaning up the FEMP 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 and exceed 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 FEMP 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 EPA both in its guidance for Superfund sites, and during discussions between FEMP managers and EPA Superfund managers regarding community relations needs at the FEMP.

The RI/FS Community Relations Program for the FEMP 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 exceed 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 FEMP

From the beginning, this has been the most basic aim of the FEMP Community Relations Program -- to provide residents with information they need in order to understand the FEMP 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 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 FEMP 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, 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 Section 4.3 of this plan.

4.3 Program Highlights

The activities that follow are designed to meet one or more of the FEMP RI/FS Community Relations Program objectives identified in Section 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 Sections 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 Section 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 Fernald Project Cleanup Report, Roundtables, FRESH meetings, township trustee briefings, and speakers bureau sessions.

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 EPA and DOE.

Advance notification of meetings will be given to persons on the FEMP mailing list via a DOE "Dear Neighbor" letter plus flyers will be distributed throughout the local community, allowing interested community members adequate time to make arrangements to attend. Potential meeting locations are identified in Appendix F. To ensure that each meeting fulfills public information and involvement needs, DOE will continue to solicit community input into planning future meetings. DOE will continue to coordinate these meetings with EPA and OEPA, who are invited to participate, along with other appropriate agencies. Each meeting will feature technical presentations, comments by DOE and the regulators, and opportunities for individuals or group spokepersons to make statements or ask questions. Meeting transcripts will be provided at the PEIC (See Appendix A).

Response to Community Questions. 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, DOE will answer those questions in writing within a specified reasonable time, such as 30 days.

Telephone and Personal Contacts. 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 renamed Fernald Project Cleanup Report. This is a new publication that DOE is designing to provide up-to-date information on new findings and site developments related to ongoing cleanup activities at the FEMP. It is intended to keep the community abreast of timely information between the regularly scheduled public meetings. It is expected to be published approximately four times a year. Its sole focus will be on information about CERCLA-related activities, and not general plant news as reported in the current Fernald Project Update. Two issues (November 1990 and March 1991) went under the name Cleanup Update; under the new name, Fernald Project Cleanup Report, issues were

mailed in July and October 1991. The Fernald Project Update will be retained as a general topic newsletter and the Fernald Project Cleanup Report will be devoted exclusively to cleanup and CERCLA related activities.

Presentations and Briefings to Community Groups and Elected Officials. DOE will continue to provide briefings about the FEMP 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.) DOE also makes presentations to other units of local government and local organizations on request. A site briefing is given at all FRESH meetings by DOE or WEMCO community relation personnel and numerous presentations have been given to local governments.

Community Roundtables. Informal opportunities also exist for small groups of community members to discuss a variety of FEMP issues, such as contaminated groundwater, with technical staff. The Community Roundtable program, initiated by WEMCO in March 1990, is structured around the results of questionnaires sent to persons on the FEMP mailing list. In 1991, community residents identified contaminated groundwater, cleanup progress at the FEMP, and hazardous waste at the FEMP as the three issues they would most like to discuss. Roundtable discussions focused on one topic will be held 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 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 removal actions and the alternatives available for each operable unit. Each workshop may be held more than once, depending on need and proposed audience. DOE has committed to holding a workshop for each removal action EE/CA during the public comment period.

Community 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 FEMP site on weekends or after hours on weekdays. In some cases these events have been related to FEMP 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, 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 business hours to call DOE's PIO at 738-6004
- Disseminating the phone number for the plant's 24-hour security office to be used at all other times -- 738-6295

- Instructing all RI/FS contractors to report: (1) their presence off-property to the security office on weekends and after hours on weekdays, and (2) any nonroutine events

- Requiring all such community hotline communications to be logged

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

Reading Rooms. The information repository program began in 1985. The four repositories, known locally as reading rooms and recently condensed to the PEIC, 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 materials in the reading room at the PEIC will be organized in such a way that the AR can be distinguished from other site-related materials.

Persons interviewed who had used the reading rooms mentioned difficulties in finding materials they were seeking. They made several suggestions, 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. The reading room location is provided in Appendix A.

Administrative Record. The AR for each operable unit and for each removal action undertaken is located in the PEIC, JAMTEK Building, 10845 Hamilton-Cleves Road, Ross, Ohio. It documents comments received from the public and DOE's response to those comments. DOE will inform the community about the availability of AR files maintained for each operable unit in the RI/FS and for each removal action undertaken. 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.

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 AR, 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 FEMP, 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 FEMP Speakers Bureau was designed to provide FEMP speakers for community, business, civic and professional organizations. RI/FS staff and personnel supporting other environmental projects, such as removal actions and the EIS, will be available to assist in this ongoing FEMP effort. More emphasis will be directed to providing FEMP speakers for students and educators.

Plant Tours, Field Trips and Open Houses. Plant tours will continue. These tours demonstrate cleanup activities planned, initiated, or completed on site. Field trips and open houses will be scheduled 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 FEMP 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 are available for viewing at the PEIC 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 FEMP 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 FEMP 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 AR, 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 Fernald Project Cleanup 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; a generic outline for a removal action CRP is provided in Appendix G.

EIS Public Participation. The procedures for integrating the EIS into the RI/FS, documented in the FEMP 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 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.

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 in at least one major local newspaper	Day 1
4.	Provide the EE/CA to all AR file locations	Day 1
5.	Provide a 30-day period for public comment on the EE/CA	Day 1 - Day 30
6.	Provide a description of the removal action in the Fernald Project Cleanup Report	Next Available Issue
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
	After Original Public Comment Period	
9.	Develop responses to significant community concerns	Day 31 - Day 45
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.

Public Notices. Public NOAs will be published in at least one local newspaper for each EE/CA and for all RI/FS primary documents.

Public Comment Periods. Public comment periods will be held for each EE/CA, for all draft RI/FS reports, 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 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 AR, 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 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 a summary of each activity identified in the Program Highlights Section and their schedule status per year.

Table 4-2
FEMP RI/FS COMMUNITY RELATIONS PROGRAM HIGHLIGHTS

ACTIVITY	SCHEDULE STATUS PER YEAR
• RI/FS Community Meetings	held at least three times a year at discretion of DOE
• Community Roundtables	at least six per year
• Fact Sheets	as needed
• Workshops	as needed
• Reading Room at PEIC	on-going
• Administrative Record	updated as documents are completed and approved
• Community Hotline	on-going
• Speakers Bureau	as requested
• Plant Tours	as needed, at the discretion of DOE
• Fernald Project Cleanup Report	four times per year or in conjunction with the RI/FS Community Meetings
• Videotapes	as needed
• Press Releases	as needed
• Public Notices	as needed
• Presentations/Briefings	as requested
• Community Contacts	as needed
• Responses To Questions	as requested
• EIS Scoping Meetings	as needed

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 help 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 reinvestigate or recharacterize site contamination, project delays, or the inability to reach or implement a Record of Decision. Some of these situations have already occurred at the FEMP.

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

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 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 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, DOE will ensure that it is kept apprised of the community's concerns and desires throughout this process. This routine feedback will enable DOE to identify potential sources of conflict in a timely manner. While the specific nature of these conflicts cannot be anticipated, 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 DOE with respect to the Superfund process. In particular, proposed plans, public comment periods, and responsiveness summaries will ensure that 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. 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 FEMP'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 Fernald Project Cleanup Report 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 FEMP READING ROOM AND ADMINISTRATIVE RECORD FILES

Location	Hours
Public Environmental Information Center JAMTEK Building 10845 Hamilton-Cleves Highway Harrison, Ohio 45030 513-738-0164	Mon and Thurs: 9 am - 8 pm Tues, Wed, Fri: 9 am - 4:30 pm Sat: 9 am - 1 pm

The Adminstrative Record is also available at the U.S. EPA Region 5 Office:

U.S. EPA - Region 5, HR-12
230 S. Dearborn Street
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 FEMP

Contacts During Business Hours:

Teressa Kwiatkowski Department of Energy Public Information Officer P. O. Box 398705 Cincinnati, OH 45239-8705	513-738-6004 (FAX) 513-738-6650
John F. Martin RI/FS Community Relations Task Leader Advanced Sciences, Inc. P. O. Box 475 Ross, OH 45061-0475	513-738-3100 (FAX) 513-738-0767
Pete Kelley Public Affairs Manager Westinghouse Environmental Management Company of Ohio P. O. Box 398704 Cincinnati, OH 45239-8704	513-738-6644 (FAX) 513-738-6968
Gregory K. Ossmann Manager, Community Relations PARSONS 6120 South Gilmore Road Fairfield, Ohio 45014	513-870-8148 (FAX) 513-870-0444

Evening and Weekend Contact:

FEMP Security	513-738-6295

U.S. EPA

U.S. EPA Hotline 800-621-8431

James Saric 312-886-0992
Remedial Project Manager (FAX) 312-353-6775
U.S. EPA - Region 5, HR-12
230 S. Dearborn Street
Chicago, IL 60604

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

OHIO EPA

Don Schregardus, Director 614-644-2000
Ohio Environmental Protection Agency
P.O. Box 1049
1800 Watermark Drive
Columbus, OH 43266-0149

Patricia Madigan, Community Relations 614-644-2160

Tom Winston, District Chief 513-285-6357
Ohio Environmental Protection Agency
Southwest District Office (FAX) 513-285-6249
40 South Main Street
Dayton, OH 45402-2086

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

Departments of Health

Ohio Department of Health 246 N. High Street Columbus, OH 43212	800-523-4439 614-466-3543
Robert Owen, Administrator 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 FEMP

Crosby Township Trustees

Gary Storer, President
[redacted]

Warren E. Strunk
[redacted]

Jane Harper
[redacted]

Doris Turner, Clerk
[redacted]

Ross Township Trustees

Thomas Willsey, Jr., President
[redacted]

David M. Young
[redacted]

Donald H. Thiem, Vice President
[redacted]

Betty Brown, Clerk
[redacted]

Morgan Township Trustees

Robert Copeland, President
[redacted]

Anthony Sears
Bebb Road
Okeana, OH 45053
Not Available

Karl Dillhoff
[redacted]

Charlotte Lahmann, Clerk
[redacted]

BUSINESSES LOCATED NEAR THE FEMP

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

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

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

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

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

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

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

Knollman Farm, Inc.
2513 Willey Road
Harrison, OH 45030
513-738-1745
Resident 513-738-2563

SCHOOLS

Ross Local Schools

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

Elda Elementary
Mick Teufel, 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
Dr. Kay Bowling (effective 7-1-92)
230 South Elm Street
Harrison, OH 45030
513-367-4139

Crosby Elementary
Daniel Lawler, Principal
8382 New Haven Road
Harrison, OH 45030
513-738-1717

Wm. Henry Harrison High School
Carroll E. Roberts
513-367-4169

Harrison Junior School
John Jostworth
513-367-4831

Harrison Elementary School
Robert Stoll
513-367-4161

Elizabethtown Elementary School
Fritz Monroe
513-353-2340

Hooven Elementary School
Fritz Monroe
513-353-2620

Miamitown Elementary School
Carter Cordes
513-738-1717

Whitewater Valley Elementary School
Gregg Tracy
513-367-5577

FEMP NEIGHBORS AND KEY MEMBERS OF FRESH

Russell Beckner

[redacted]

Vicky Dastillung, FRESH

[redacted]

Sandy Butterfield, FRESH

[redacted]

Pam Dunn, FRESH

[redacted]

Lisa Crawford
Spokesperson for FRESH

[redacted]

Gerda B. McFarland, FRESH

[redacted]

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APPENDIX D

MEDIA CONTACTS

WIRE SERVICES

Associated Press
John Nolan, Cincinnati Correspondent
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
Mike Philipps, Metro Editor
Al Salvato, Reporter
125 E. Court Street
Cincinnati, OH 45202
513-352-2722
FAX: 513-621-3962

Cincinnati Business Courier
Bryan Settle, Editor
1005 Carew Tower
Cincinnati, OH 45202
513-621-6665
FAX: 513-621-2462

Cincinnati Enquirer
Kerry Klumpe, Metro Editor
Elizabeth Neus, Reporter
617 Vine Street
Cincinnati, OH 45202
513-369-1931
FAX: 513-369-1813

Press Community Newspapers
Western Division
Joe Beach, Managing Editor
5505 Cheviot Road
Cincinnati, OH 45247
513-923-3111
FAX: 513-923-1806

Dayton Daily News
Jim Ripley, Metro Editor
Jim Babcock, Reporter
4th and Ludlow Sts
Dayton, OH 45401
513-225-2213
FAX: 513-225-2489

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

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

Harrison Press
Ollie Roehm, Editor
307 Harrison Ave.
Harrison, OH 45030
513-367-4582
FAX: 513-367-4593

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
FAX: 812-537-5576

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)
513-763-5500 (Switchboard)

WXIX-TV, Channel 19 (Fox Broadcasting Network Affiliate)
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
513-556-4444

WKRC/WKRQ AM
1906 Highland Avenue
Cincinnati, OH 45202
513-721-6397 (Newsroom)
513-381-5500 (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. SENATE

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
1180 Market Tower
10 W. Market Street
Indianapolis, IN 46204
317-226-5555

The Honorable Daniel R. Coats
Room 407
Russell Senate Office Building
Washington, D.C. 20510
202-224-5623
1180 Market Tower
10 W. Market Street
Indianapolis, IN 46204
317-226-5555

U.S. HOUSE OF REPRESENTATIVES

Ohio

The Honorable Charles J. Luken
Representative, First District
Room 1632
Longworth House Office Building
Washington, D.C. 20515
202-225-2216
602 Main Street, Room 712
Cincinnati, OH 45202
513-684-2723

The Honorable John A. Boehner
Representative, Eighth District
Longworth House Office Building
Room 1020
Washington, D.C. 20515
202-224-3121
5617 Liberty-Fairfield Road
Hamilton, OH 45011
513-894-6003

The Honorable Bob McEwen
Representative, Sixth District
Room 2431
Rayburn 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 George V. Voinovich
Governor, State of Ohio
State House
Columbus, OH 43266-0601
614-466-3555

Hamilton County - Senate

The Honorable Stanley J. Aronoff
Senator, Eighth District
President, Ohio Senate
State House
Columbus, OH 43266-0604
614-466-8068
513-241-0400

The Honorable William F. Bowen
Senator, Ninth District
State House
Columbus, OH 43266-0604
614-466-5980
513-961-5415

The Honorable Richard H. Finan
President Pro Tempore
Senator, Seventh District
State House
Columbus, OH 43266-0604
614-466-9737
513-563-6161

Hamilton County - House

The Honorable Louis W. Blessing, Jr.
Representative, Twenty-second District
Vern Riffe Center
State House
Columbus, OH 43215
614-466-9091
513-385-1234

The Honorable Jerome F. Luebbers
Representative, Twenty-first District
Vern Riffe Center
State House
Columbus, OH 43215
614-466-5786
513-241-9433

The Honorable William L. Mallory
Majority Floor Leader
Vern Riffe Center
Representative, Twenty-third District
Columbus, OH 43215
614-466-7197
513-721-0065

The Honorable Jacquelyn K. O'Brien
Representative, Twenty-sixth District
Vern Riffe Center
State House
Columbus, OH 43215
614-466-8104
513-231-5331

Hamilton County - House

The Honorable Cheryl Winkler
Representative, Twentieth District
State House
Columbus, OH 43215
614-466-2715
513-574-2577

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
614-466-8072
513-422-2001

The Honorable Scott Nein
Representative, Fifty-seventh District
State House
Columbus, OH 43266-0604
614-466-8550
513-779-1600

The Honorable Michael A. Fox
Representative, Fifty-sixth District
State House
Columbus, OH 43266-0604
614-644-6721
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 S. Beckwith, President
Steven J. Chabot, Commissioner
John S. Dowlin, Commissioner
Thomas W. Wenz, Administrator
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 Middle/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
Venice Presbyterian Church 4244 Layhigh Road, Ross, OH (with Session approval) 738-1317	X	X	
Executive Resource Associates 10991 Hamilton-Cleves Road, Ross, OH Receptionist 738-0002	X	X	
Advanced Sciences, Inc. 11003 Hamilton-Cleves Road, Ross, OH Receptionist 738-3100	X		
The Plantation 9660 Dry Fork Road Harrison, Ohio 45030 Jeff Beckman 367-5610		X	X
Public Environmental Information Center JAMTEK Building 10845 Hamilton-Cleves Road Harrison, Ohio 45030 Janie Croswait 738-0164	X		
The Meadowbrook Conference Center 2398 Venice Boulevard Ross, Ohio 45061 Earl Hilvers 738-2448 or 738-9924			X

APPENDIX G

COMMUNITY RELATIONS PLAN REMOVAL ACTION ADDENDUM OUTLINE

List of Acronyms

List of Tables and Figures

Introduction to Removal Action

Objectives of Removal Action

Background

Overview of Community Concerns

Highlights of Community Relations Activities

Timetable