

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

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December 3, 1990

Roy Romer
 Governor

Thomas M. Vernon M.D.
 Executive Director

Mr. Martin Hestmark
 U.S. Environmental Protection Agency
 Region VIII
 999 18th Street, Suite 500, 8WM-C
 Denver, Colorado 80202-2405

RE: REVIEW AND COMMENT, COMMUNITY RELATIONS PLAN, DRAFT VERSION,
 NOVEMBER, 1990

Dear Mr. Hestmark,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the draft version of the Community Relations Plan (CRP) submitted by DOE and its prime operating contractor, EG&G. The Division's comments are attached.

The plan suffers from a lack of innovation and the Division is concerned that, though the plan fulfills the minimum community relations needs, it does not go the extra steps needed to allay public fears and heal public mistrust of the plant and DOE. In no other environmental restoration document will RFP have a better chance to change these perceptions than in the CRP. It is, therefore, the Division's recommendation, that the CRP be expanded beyond the minimum requirement whenever necessary to meet the communities' needs.

If you have any questions regarding these comments, please contact Joe Schieffelin of my staff at 331-4421.

Sincerely,

Gary W. Baughman
 Unit Leader, Hazardous Waste Facilities
 Hazardous Materials and Waste Management Division

cc: Robert M. Nelson, Jr., DOE
 Fraser Lockhart, DOE
 James O. Zane, EG&G
 Tom Greengard, EG&G
 Dan Miller, AGO
 Marion Galant, CDH
 Joe Palomba, RFPD
 Anne Lockhart, RFPD

ADMIN RECORD

A-SW-000171

TO: The U. S. Department of Energy
FROM: The Colorado Department of Health
SUBJECT: Review and Comment, Draft Version Community Relations Plan (CRP), November, 1990

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General Comments

- 1) This document should not only list the milestone dates for public involvement as required by the IAG, but should summarize the points within the RCRA/CERCLA process at which public involvement is required. The list of public comment opportunities (Appendix E) could then be an illustration of how RFP is fulfilling this part of the required public involvement process.
- 2) While the CRP summarizes responses to the interviews, it makes no effort to tabularize the demographic breakdown of the participants. This casts a shadow over the entire interview process. A reader may question whether the group chosen was a representative cross-section of the public and included someone with his/her concerns.
- 3) On the whole, this document only meets the minimum community relations needs that exist at RFP. The plan shows very little initiative on the part of RFP to put their best foot forward. The CRP is an opportunity for DOE and EG&G to show that they intend to go beyond fulfilling the minimum requirements and to set new standards in community relations. This is a chance for the plant to become active on community needs rather than reactive. All parties involved at RFP desperately need to improve their public images. Making the CRP innovative, friendly, and inventive will help to change the perception that only highly screened information is given to the public and the truth is inaccessibly buried.
- 4) Once the CRP is in final form, a summary of the types, dates, and locations of all community involvement opportunities should be created. The summary should be a part of this document, but should also be available as a separate item and distributed in all public forums that are applicable (libraries, public buildings, public meetings, mailings, shopping malls, convenience stores, etc.). Updates can be issued as needed.
- 5) Somewhere within this CRP, there needs to be a statement that assures readers that this document, even in it's final version, is not set in stone and that changes and amendments will be formulated

when the need arises.

6) Every effort needs to be made in this and all future documents to prepare them in a clear and understandable fashion, useable in the technical community, but also prehensible in the lay community. Public knowledge and input into the remediation process will, hopefully, lead to better technical decisions and public support for the result.

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Specific Comments:

Overview, page 2: Within OSWER Directive 9230.0-3B, Community Relations in Superfund: A Handbook, Interim Version, June 1988 (the guidance document), it is indicated in section 3.2.3.1 that the "Overview" portion of the CRP should contain the "distinctive or central features" of the community relations effort. At present, the overview only includes a summary of the RCRA/CERCLA ER stages, but does not even explain the public involvement opportunities within each stage let alone mention other public forums available. Please expand this section to include these items.

Overview, page 2: Please clarify the definition of "the community" referenced in paragraph 7. Also, what communities and counties comprise "metropolitan Denver?"

Overview, page 2: In the same section of the guidance document referenced above, "special characteristics of the community and the site should be introduced" in the Overview. These items were not found and need to be included.

Overview, page 3: In section 3.2.3.2 of the guidance document, site description should include, relative to the plant, the locations of homes, schools, playgrounds, businesses, lakes, streams, and parks. Only a discussion of lakes and streams was found within the Overview portion of the CRP.

Site Description, page 3: Please include at least two maps in this section. The first should show RFP in relation to the surrounding communities (Figure 1 - being generated). The second map should be a more detailed map of the plant showing creeks, reservoirs, and local land use. These two maps will aid understanding of the written description of the plant.

Site Description, page 6: In the third paragraph on this page, reference is made to several substances whose containment is a concern to the plant. Several of these have already been detected in ground and surface water both on and off-site. Please reference this fact and explain more thoroughly what has been found and where.

Site Description, page 6: The same paragraph referenced in the

preceding comment contains the terms "mutagenic and teratogenic." Please define these words and explain what "other life forms," other than human, are affected by the referenced substances.

Site Description: Please include a more in-depth history of plant operations that incorporates the two fires, the FBI raid, and any other events that caused concern and fear within the public. An additional appendix with a chronological list of important historical dates and events would be helpful.

Community Background, page 7: The community profile is very sketchy. A more extensive description of real estate developments and communities, both existing and planned, neighboring the plant would be helpful. How close and in what direction are residents in these communities to the plant? What is the current zoning of areas around the plant and what are current land use plans? Are there currently any restrictions in any of the adjacent municipalities on development near the plant? Do any of these communities use water that originates in or flows through the plant? How will the proposed extension of highway C-470 affect the plant and vice versa?

Community Background, page 7: In the second paragraph of this section is text stating "As a whole, the citizens in the area have a high level of general knowledge about the Rocky Flats Plant, its mission and the associated environmental issues." What is the basis or justification for this statement? Many of the most active, vocal, and informed citizens would disagree. In fact, it should be the assumption of the CRP that the opposite is true. When considering the end of the Cold War, does DOE even know the Rocky Flats Plant's mission?

The same paragraph states that the Denver area has the second highest number of college graduates in the country. Second to whom? Is a percentage or a number intended here? It is hard to imagine that Denver is second in number when the city is not among the ten largest cities in the U.S.

The last sentence in paragraph two is an understatement! There were extensive comments from interested citizens, local government officials, and representatives of Rocky Flats-related special interest and environmental groups asking for improved public access to information and earlier involvement in the ER process. These comments were received during comment on the IAG. A list and description of the various interest groups (anti-war, environmental, local government, labor, business, school, scientific, religious, etc.) should be included in the community profile.

Community Background, page 7: In the "Chronology of Community Involvement" section, a more thorough description of the kind and frequency of protest demonstrations over the years would, perhaps, better characterize public concerns and sentiments about the plant.

Community Background, page 7: Explain the purpose of the 1986 Compliance Agreement mentioned in the third paragraph of the "Chronology of Community Involvement" section.

Community Background, page 8: Within the "Key Community Concerns" section, only the top five concerns are discussed. A more complete list needs to be included that addresses all the concerns raised as well as general concerns that are prevalent but may not have been specifically mentioned in the interviews (i.e., waste storage on plant site, transportation of wastes, etc.).

Within the interviews, were concerns about cancer and health related worker lawsuits mentioned? Was there concern about evacuation necessitated by un-planned toxic releases or fires? Did any particular group express concern about certain items (like nearby residents fearing releases, water quality, and air quality) or were people throughout the metropolitan area equally concerned about all of the items?

Objectives, page 9: The goal "to improve the availability of information" is great, but the information needs to be in useable form. An effort to provide clear, concise, and understandable information to the lay public without excessive technical language or acronyms should be made.

Community Relations Activities, page 11: Within the "Mailing List" section, a more detailed method of contacting the Community Relations Plan Coordinator needs to be included (i.e. phone number, mailing address, etc.).

Community Relations Activities, page 11: Within the "News Releases" section, please include specific items that should be considered and addressed by news releases, regardless of the specific topic.

Community Relations Activities, page 11: Please clarify whether the quarterly public meetings will provide opportunities for public questions or input. Also, include an appendix listing which general circulation publications will be used for public meeting notification so that interested parties know where to look. This should be accompanied by information on the publication's circulation and distribution area. A list of the major radio and television stations should be included as well, along with their format and audience and the reason they were chosen. This information should be within the CRP for all types of public meetings and public comment opportunities.

Within what time period will transcriptions of public meetings be available?

Community Relations Activities, page 12: Television stations need to be added to the notification list in the fourth paragraph on this page.

Community Relations Activities, page 13: Television and radio stations need to be added to the notification list in the third paragraph on this page.

Community Relations Activities, page 13: According to guidance document section 2.2.4, the public must be notified of the availability of any RI/FS Workplan and/or Decision Document. The guidance states, "The public notice must identify the lead agency's preferred remedy, the other alternatives which were analyzed, the location of the administrative record, community involvement opportunities, and the name of an agency contact. . . Public comment must be solicited on all alternatives, not just the preferred alternative . . ." None of this is clear in the CRP at present.

Community Relations Activities, page 15: This "Fact Sheet" section needs to be expanded to include a description of how and when the fact sheets will be made available to the public. Explain how much notice will be given to the public before commencement of any remedial action.

Community Relations Activities, page 16: Under the "Amendment to the IAG" section, please clarify "notice of placement" and "area publications."

Additional Activities, page 16: It is commendable that the plant is undertaking several activities that are not required. Will efforts be made to publicize briefings, presentations, speakers, and public tours and that these activities are available on request?

Additional Activities, page 16: Please clarify more completely the role of the Technical Review Committee.

Additional Activities, page 16: The following is a list of ideas that could be considered for inclusion in "Additional Activities":

- 1) A telephone hotline for environmental restoration activities and public involvement opportunities.
- 2) A CRP Summary as referenced in General Comment 4.
- 3) Technical Work Sessions or Workshops similar to that used in preparation of the 881 Hillside RFI/RIFS.
- 4) Audio cassette tapes containing in audio form the same information contained in the ER Updates. This was requested by at least one of the interviewees and no mention of it is found anywhere in the document.
- 5) A "Poster Session" format at technical presentations including diagrams, photographs, charts, and maps.
- 6) Development of a "Citizen's Guide to Environmental Restoration at the Rocky Flats Plant."
- 7) Two page "Citizen's Summary" of public documents, particularly those that do not go to public comment.
- 8) Small "availability sessions" at which project staff can answer citizen questions in a non-threatening, intimate setting that is not intimidating like some

public meetings can be.

9) Televised panel discussions like "Countdown to Shutdown" should be considered at two year intervals.

Appendix A, CDH - Technical listings: The following listing needs to be added to the one already present:

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Unit Leader
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Denver, Colorado 80220

Appendix A, Elected Officials: This list needs to be updated to include the newly elected officials.

Appendix A, News Media: Please add a listing for the Denver Post newspaper as well as listings for the major television and radio stations in the Denver Metropolitan Area.

Appendix B: Please provide an explanation of how and why these substances appear on this list. Generally, where are they found and in what concentrations? How did they get where they are?

Appendix C: This represents an excellent effort to listen and understand people's concerns and feelings about RFP. Include more of this information in the main body of the CRP. A great deal of time and energy was spent gathering this information, and it deserves a larger emphasis in the text. Expand anecdotal information summarizing the feelings and perceptions of the people interviewed in addition to the generic summary of concerns that is presently in the text. By acknowledging people's feelings and concerns, they feel validated and will be more likely to listen in the future.

Appendix C: Please add information explaining the demographics of the people chosen, how many people took part, how they were chosen, and what questions were asked.

Appendix D: Information on the usual locations for the Public Meetings needs to be included here.

Appendix E: A brief, simple, non-technical explanation of each of these documents following the title would make this appendix much more informative and user-friendly.

Appendix F: This should have been included in this draft copy of the CRP for review. It is not difficult to prepare a glossary, particularly when several already exist in other documents and EPA has a good one as well.