

**Community Relations Plan
for the
Combustion Engineering Site
Windsor, Connecticut**

December 2009

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LIST OF ACRONYMS

ABB Inc.	ABB
ACOE	Army Corps of Engineers
AEC	Atomic Energy Commission
AOC	Area of Concern
CE	Combustion Engineering, Inc.
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CTDEP	Connecticut Department of Environmental Protection
D&D	Decontamination and Dismantlement
DOE	U. S. Department of Energy
FSS	Final Status Survey
FUSRAP	Formerly Utilized Sites Remedial Action Program
HLA	Harding Lawson Associates
ICM	Interim Corrective Measure
KAPL	Knolls Atomic Power Laboratory
MARSSIM	Multi-Agency Radiation Survey and Site Investigation Manual
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NEPA	National Environmental Policy Act
NPL	National Priorities List
NRC	Nuclear Regulatory Commission
OSHA	Occupation Safety and Health Administration
RCRA	Resource Conservation and Recovery Act
RSR	Remediation Standard Regulations
SARA	Superfund Amendments and Reauthorization Act of 1986
Site	CE Windsor Site; 2000 Day Hill Road in Windsor, Connecticut
USEPA	U.S. Environmental Protection Agency
VCA	Voluntary Corrective Action

1.0 Introduction

This Community Relations Plan proposes a program to facilitate communication and information exchange and encourage involvement of the local community interested in the environmental remediation of the remaining contaminated areas at the Combustion Engineering, Inc. (CE) facility located at 2000 Day Hill Road in Windsor, Connecticut (CE Windsor Site or Site). The property is currently owned by ABB Inc. (ABB).

In July 1999, a Community Relations Plan was developed to outline the community relations program associated with environmental investigation and cleanup activities being conducted under the Resource Conservation and Recovery Act (RCRA) Voluntary Corrective Action (VCA) Program at the CE Windsor Site (Harding Lawson Associates [HLA], 1999).

In August 2007, community interviews were conducted to obtain input and feedback regarding the community outreach and involvement programs. The Community Relations Plan was revised in September 2007 as a result of these interviews (ABB, 2007).

In September 2009, the Connecticut Department of Environmental Protection (CTDEP) issued ABB a Stewardship Permit for the CE Windsor Site (CTDEP, 2009). This Community Relations Plan has been revised to comply with the public participation requirements of the Stewardship Permit.

1.1 Community Relations Overview

This plan gives the overview of the history of the CE Windsor Site, including past government involvement in the site, the regulatory requirements for a clean-up of environmental contamination, roles and responsibilities of all the parties involved in the remediation, and current status of activities at the site.

The plan also proposes a number of options for conducting community relations activities as required by RCRA, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), and other applicable statutes and regulations to involve the local community in the environmental activities at the Site to assure community understanding of the cleanup process and cleanup options.

2.0 CE Windsor Site

CE operated a successful nuclear fuel production and nuclear research development and engineering facility in Windsor, Connecticut for more than 40 years. Past

operations, including those funded by the U.S. Department of Energy (DOE) and its predecessor agency, the Atomic Energy Commission (AEC), produced some residual radioactive contamination at several locations on the Site. Additionally, past operations produced some chemical and metals contamination as a result of nuclear fuel production for both the government and commercial activities.

2.1 Site Description

The CE Windsor Site is located at 2000 Day Hill Road, 8 miles north of Hartford and within three miles of Bradley International Airport. The Site is approximately two miles northwest of the town of Windsor center, and is located south of the Farmington River (Figure 1). The Site consists of approximately 600 acres. The surrounding area is zoned for residential, agricultural, and industrial use. The nearest residential areas are located within ¼ to ½ mile of the site. The Site is an area classified by the Town of Windsor as an I-2 industrial zone. I-2 industrial zones provide for general, higher intensity industrial uses. The area is characterized by various wooded areas and three ponds (Figure 2). The Site is within a broad basin of gently rolling terrain called the Connecticut River Valley.

2.2 Site History

Under contract by the Atomic Energy Commission

CE began operations on the Day Hill Road site in 1956 when it was contracted by the AEC to engage in research, development, engineering, and manufacturing of nuclear fuel for the U.S. Navy, to design and construct a prototype submarine reactor for training naval personnel, and to manage operations of the reactor site known as S1C.

Nuclear fuel production for the AEC at this facility ceased in 1960. In 1960 the S1C site was sold to the U.S. government, although CE continued to manage operations there until 1970, when Knolls Atomic Power Laboratory (KAPL) took over operations of the S1C facility. Remediation of the S1C site was completed in 2005 and the parcel was subsequently purchased by ABB.

Investigation and cleanup of sites involved in the Nation's early atomic energy program was assigned to DOE's Formerly Utilized Sites Remedial Action Program (FUSRAP) in 1974. Congress assigned FUSRAP to the Army Corps of Engineers (ACOE) in October 1997. In 2007, ACOE and the Nuclear Regulatory Commission (NRC) agreed that the regulatory oversight of the cleanup would be transferred to the NRC, which will keep ACOE informed on the remediation of the FUSRAP contamination. Radiologically-impacted areas are identified in Section 2.4 of this Plan.

In 2009, the NRC accepted ABB's Decommissioning Plan for remediation of radiological contamination resulting from government-related work conducted by CE and has given ABB permission to conduct remediation of the areas classified under FUSRAP. The Decommissioning Plan addresses all remaining areas of residual radiological contamination at the CE Windsor Site with the exception of Site Brook. ABB will be preparing and submitting a Decommissioning Plan for Site Brook in 2010.

Commercial contracts

Following the successful completion of government contract work, CE was involved in the research, development and engineering of commercial nuclear and fossil fuel systems at the Windsor Site for the electric power generation industry. CE manufactured commercial nuclear fuel on the Site from 1968 to 1993. In 2000, the ABB nuclear businesses operating at the Site were sold to Westinghouse and the fossil fuel businesses were sold to Alstom Power. However, ABB retained ownership of the CE Windsor Site property.

ABB has characterized and remediated radiological residuals released during work conducted under commercial contracts. Since 2000, ABB has removed 16 buildings and 5 miles of underground utilities that were used to service commercial nuclear contracts. Remediation was performed under the oversight of the NRC and CTDEP. There were no Occupational Safety and Health Administration (OSHA)-recordable injuries in more than 170,000 person-hours worked.

Chemical contamination

Since the Site was a permitted hazardous waste storage facility in the 1980s, it is subject to corrective active action under RCRA. Chemical releases to the environment, that have taken place as a result of both government and commercial nuclear fuel production and fossil fuel research are being addressed by ABB under the U.S. Environmental Protection Agency's (USEPA) VCA program. The Site was declared stabilized by the USEPA in 2001. The extent of chemical impacts on the entire Site is known and is not posing health hazards to humans on or off site.

In September 2009, the CTDEP issued a Stewardship Permit to ABB for the CE Windsor Site. The Permit regulates and authorizes ABB to complete environmental investigation, cleanup, and closure at the Site. The Stewardship Permit divides the Site into two parcels: the Outer Parcel and the Inner Parcel. In conjunction with the Stewardship Permit, the CTDEP has issued ABB a Certificate of Completion for the Outer Parcel where all necessary remediation has been completed. The Outer parcel has also been released by the NRC. The Inner Parcel is the portion of the CE Windsor

Site where the remaining remediation areas are located. Remediation of the Inner Parcel is governed by the Stewardship Permit.

Cleanup completion

Cleanup at the CE Windsor Site continues. Remediation of remaining radiological contamination and any associated chemical contamination will take place in the third and final phase of remediation. Groundwater remediation of chlorinated solvent contamination will also take place during this final phase of remediation.

2.3 Organizational Roles and Responsibilities

ABB currently owns the CE Windsor Site and is directing Site remediation. However, a number of organizations and government agencies have responsibilities in the investigations and cleanup of the CE Windsor Site. Each organization has a unique role, yet all are working toward a common goal – the ultimate cleanup of the Site to an acceptable level that ensures the health and safety of the people and the environment and allows for the future use and redevelopment of the Site.

DOE, formerly the AEC, is the federal agency responsible for initiating and maintaining the nuclear materials development and use program in the U.S. DOE provides nuclear fuel for commercial and government nuclear reactors currently operating in the U.S. and oversees much of the environmental restoration program relating to nuclear materials across the country. In 1974, AEC established FUSRAP to identify and clean up or otherwise control sites where residual radioactive constituents exceeding current guidelines remain from the early years of the nation's atomic energy program or from commercial operations causing conditions that Congress authorized DOE to remedy. Responsibility for the FUSRAP program was transferred to ACOE in 1997.

The NRC establishes guidance to adhere to internationally agreed upon requirements for levels of radioactivity acceptable to humans and the environment. NRC grants licenses for nuclear materials possession, production and handling, and establishes regulations that govern worker, public, and environmental safety for the handling, storage, and transport of radioactive materials, and storage and handling requirements. Currently, ABB is licensed by the NRC.

Based on the August 2007 agreement between ACOE and NRC, the NRC has become the federal agency responsible for the oversight of the cleanup of the remaining commercial and FUSRAP radiological residues at the CE Windsor Site.

CTDEP is the State agency responsible for ensuring adherence to state environmental regulations. The CTDEP Monitoring and Radiation Division of the Bureau of Air Management will continue to provide oversight and review of radiological issues. The Stewardship Permit issued by the CTDEP in September 2009, governs investigation and remediation of the remaining chemical impacts on the CE Windsor Site.

USEPA is responsible for developing rules and regulations to provide for the protection of the public's health and well-being. USEPA produces lists of pollutants that cause harm to people or the environment and has established guidelines for levels of contaminants that are acceptable for air, water, soil and other media. In the State of Connecticut, USEPA utilizes remediation standards called Remediation Standard Regulations (RSRs) promulgated by the State to govern the cleanup. USEPA will continue to provide direction and oversight of chemical cleanup.

2.4 Site Characterization Activities

Corrective Action

Stabilization of the Site was achieved in 2001 and site characterization has since been completed. ABB has completed the RCRA Facility Investigation, identifying the nature and extent of chemicals released to the environment. Where practicable, chemical releases have been remediated and post remediation groundwater monitoring conducted and/or completed. The only remaining chemical releases in soils are co-located with radiological residuals and under/around the existing heating plant for the Site. Chemical releases co-located with radiological residuals will be addressed concurrently with remediation of the radiological residuals. The chemical releases under/around the existing heating plant will be addressed during demolition of the heating plant. Groundwater remediation is anticipated to commence in 2010.

Decontamination and Dismantlement (D&D)

The NRC has concluded that the characterization data shows that radioactivity in the soil in the areas around former Building Complexes 2, 5, 6A, and 17 is below regulatory requirements for unrestricted release.

FUSRAP

CE discovered and investigated uranium residues at the Site in the early 1990s and brought them to the attention of DOE. In 1993, at the request of CE, DOE performed radiological surveys on portions of the CE Windsor Site and confirmed that government uranium was present in areas within the Waste Storage Pad (AOC 4), Buildings 3/3A (AOC 9), areas surrounding

Buildings 3 and 6 (AOC 9), Equipment Storage Yard (AOC 10), Building 6 (AOC 12), Industrial Waste Lines (AOC 12), Debris Piles (AOC 13), the Site Brook (AOC 14), The Drum Burial Pit (AOC 21), and Clamshell Waste Pile (AOC 27).

2.5 Current Site Status

Corrective Action

With the stabilization of the Site achieved and with full Site characterization complete, the objective of Site remediation is focused on the final remedy to achieve Site closure under RCRA, as well as to comply with the requirements of the CTDEP RSRs, the Connecticut Property Transfer Act, and the Stewardship Permit for the CE Windsor Site. In support of final remedy and property transfer, ABB has conducted human health and ecological risk assessments, completed the RCRA Facility Investigation, completed Interim Corrective Measures (ICMs), prepared RCRA Closure Plans and Reports, and implemented a groundwater monitoring program to demonstrate compliance with the RSRs.

In September 2009, the CTDEP issued a Stewardship Permit to ABB, which releases the CE Windsor Site from the Site's RCRA Permit. Remediation of the inner portion of the Site is governed by the Stewardship Permit. Also in September 2009, the CTDEP issued a Certificate of Completion for the outer portion of the Site where all necessary remediation has been completed. The inner and outer portions of the CE Windsor Site are shown on Figure 2.

A Remedial Action Plan has been submitted in support of remediation of chemical contamination in soil for various AOCs at the Site. A Remedial Action Plan and Design for Site-wide groundwater has been initiated and is anticipated to be submitted to the USEPA and CTDEP in 2010. A Remedial Action Plan for soil under/around the existing heating plant for the Site is anticipated to be submitted to the USEPA and CTDEP in 2010.

D&D

Following D&D activities, a Final Status Survey (FSS) was conducted for D&D areas associated with Building Complexes 2, 5, 6A, and 17. FSSs were conducted in accordance with the requirements of the Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) and the FSS Plan. After completion of the survey activities, FSS Reports are prepared to document all final surveys and sampling activities.

The FSS Report for the Building 2 Complex was submitted to the NRC and CTDEP in October 2005. The FSS Report for the Building 17 Complex was

submitted to the NRC and CTDEP in February 2006. The FSS Report for the Building 5 and 6A Complexes was submitted to the NRC and CTDEP in April 2006. The NRC provided approval of the FSS Reports by letter dated April 13, 2007, indicating that all NRC requirements for unrestricted release of the outer portion of the Site had been met.

A quarterly groundwater monitoring program and an evaluation of hard-to-detect radionuclides has been conducted at the Site. The evaluation led to the conclusion that the hard-to-detect radionuclides are minimal and do not present any health or safety hazard.

FUSRAP

Based on the August 2007 agreement between the ACOE and the NRC, the NRC has become the federal agency responsible for oversight for the remaining radiological remediation activities at the CE Windsor Site. Also, ABB is now in charge of directing all FUSRAP-related remediation activities at the Site in accordance with applicable federal and State laws and regulations to meet NRC regulations for unrestricted release of the CE Windsor Site and license termination, in preparation for redevelopment of the Site.

ABB has prepared Remedial Designs for the remaining areas of the Site requiring remediation. Following completion of the remedial actions, ABB will prepare Completion Reports to document that the remedial activities have been completed in accordance with design plans and specifications, and that the cleanup criteria established for the Site have been achieved.

Final Status Surveys will be conducted to verify compliance with NRC and CTDEP radiological cleanup criteria. Results of the surveys will be documented in a FSS Report. Subsequent groundwater monitoring will be conducted as necessary, and the results will be documented in future Groundwater Monitoring Reports.

2.6 Regulatory Framework

Radiological contamination on the CE Windsor Site is being remediated under NRC regulations to achieve unrestricted release of the Site and termination of the Site's nuclear licenses. The requirements of the Connecticut Property Transfer Act are also being met.

The CE Windsor Site has not been included on the National Priorities List (NPL), which is the listing of the nation's most serious hazardous waste sites. However, remedial actions will be conducted under the guidance of the NRC's decommissioning process; CERCLA, also known as Superfund; and the Superfund Amendments and Reauthorization Act of 1986.

Other applicable environmental regulations include the National Environmental Policy Act (NEPA), which requires all federal agencies to consider potential environmental effects in their decision-making processes before implementing any major action; RCRA, which requires safe and secure procedures for the use, storage and disposal of hazardous wastes; and the NCP, which is the federal government's blueprint for responding to hazardous substance releases into the environment.

In September 2009, the CTDEP issued a Stewardship Permit to ABB, which releases the CE Windsor Site from the Site's RCRA Permit. The Permit regulates and authorizes ABB to complete chemical-related environmental investigation, cleanup, and closure at the Site.

2.7 Remediation Plans

Remediation of the remaining radiologically-impacted areas of the CE Windsor Site, with the exception of Site Brook, is outlined in ABB's Decommissioning Plan that was approved by the NRC in July 2009. A Decommissioning Plan for Site Brook will be prepared and submitted to the NRC in 2010. Additionally, Remedial Action Plans are being prepared for the remaining areas of the Site where soil and groundwater remediation is necessary to address chemical constituents that are co-located with residual radiological contamination. These Remedial Action Plans are being developed in accordance with the requirements of the Stewardship Permit. A Remedial Action Plan for chemically-impacted soil that is co-located with radiologically-impacted materials was prepared and submitted to the CTDEP in October 2009. A Remedial Action Plan for chemically-impacted groundwater and a Remedial Action Plan for soil under/around the existing heating plant for the Site are being prepared and are anticipated to be completed by March 2010.

3.0 Community Relations

Community Relations is an important component of any hazardous waste cleanup program. People have an interest in and right to know what hazardous waste materials exist in their community. It is important for community members to understand levels of contamination and the environmental impacts and potential risks of these materials so they can put this information into the right context when comparing with other, more familiar materials. Local community members can often provide perspectives needed to make decisions on cleanup alternatives that take into consideration a variety of factors beyond the obvious technical ones.

Statutory Mandates

Activities at the Site will continue to be conducted in accordance with environmental statutes and regulations, including those associated with NRC, CERCLA, and RCRA.

NRC Decommissioning

As part of public outreach, the NRC will send letters to local Native American associations, the State Government—usually the environmental branch—the county executive or manager, and nearby city mayors to notify these entities of a licensee's plan to terminate its license under the license termination rule, and to solicit comments on the licensee's plans. Documents are also available in the NRC's Public Document Room or electronically through ADAMS. Below is a brief outline of the decommissioning process as it relates to the CE Windsor Site.

- A Decommissioning Plan has been developed and approved by the NRC as a license amendment.
- A Decommissioning Plan for the Site Brook will be developed and submitted to the NRC for approval as a license amendment.
- Remedial activities are ongoing with NRC in-process inspections.
- Final Status Surveys will be completed.
- Final Status Survey Reports will be submitted to the NRC.
- NRC review and verification will be conducted.
- NRC will terminate ABB's NRC license.
- Notice was posted in the Federal Register when the Decommissioning Plan was accepted for review with a 30 day public comment period.
- Notice will be posted in the Federal Register for the Site Brook Decommissioning Plan when the Decommissioning Plan is accepted for review with a 30 day public comment period.
- A notice of license termination will be posted in the Federal Register (no public comment period is required).

At license termination, if residual contamination levels in soil or groundwater exceed USEPA regulatory limits, the NRC will also initiate a consultation with the USEPA. This requirement was promulgated in a Memorandum of Understanding between USEPA and NRC in fall 2002.

CERCLA and the NCP

Sections 113, 117, and 122 of CERCLA, as amended by the Superfund Amendments and Reauthorization Act (SARA), establish several principal elements for community involvement. The following is a brief outline of the CERCLA and NCP process as it relates to the CE Windsor Site:

- A locally available Administrative Record has been developed.
- A locally available Information Repository has been established.
- The public has been notified of publication of the Alternatives Evaluation Report and Proposed Remedy Plan.
- A public comment period was held for the Alternatives Evaluation Report and Proposed Remedy Plan, and a meeting transcript was prepared.
- Following the public comment period, the Selected Remedy Plan was developed and placed in the Administrative Record.
- Remedial designs have been prepared based on the remedies identified in the Selected Remedy Plan.

RCRA

The CTDEP issued a Stewardship Permit for the CE Windsor Site in September 2009. The following is a brief outline of the community relations activities specified in the Stewardship Permit, and how they relate to the CE Windsor Site.

- A public notice was published in the Journal Inquirer providing notification of remediation activities.
- A public notice will be published prior to completion of remedial activities.
- A public notice will be published to provide notification of the CTDEP Commissioner's tentative determination that remediation is complete.
- A 45 day public comment period is associated with publication of each of the above-listed public notices.

There is considerable overlap of the statutory requirements relative to community relations activities. Requirements of the NRC, CERCLA, NCP, and RCRA will be integrated to eliminate redundancies.

This Community Relations Plan outlines community involvement activities that can be considered during the remediation process.

3.1 Goals and Objectives

The goals of the Community Relations Program are to facilitate dialogue, provide information exchange, and offer opportunities for involvement by community members, interest groups, and the agencies involved in the remedial cleanup program. Specific objectives are as follows:

- Inform and educate local community members and officials on the environmental cleanup process and the results of the sampling and characterization process.
- Give community members opportunities to be involved and provide input to the process of environmental studies, cleanup alternatives, and related decisions.

- Address the community's and media's information needs and inquiries through timely release of the most up-to-date information.
- Maintain a climate of openness, mutual trust, and understanding.
- Provide a single point of contact for responding to information requests.
- Identify and resolve community relations issues and potential concerns.

3.2 Communication Strategy

An effective communication strategy is one that is tailored to the unique interests and information needs of a particular group or community. Direct input from community members was obtained through telephone interviews during May 1999 and August 2007. This Community Relations Plan includes a variety of communication techniques suggested by community members that should ensure information exchange with those interested in the status of the characterization and cleanup of the CE Windsor Site. The result of a successful communication strategy will be an informed citizenry that works in partnership with the agencies and organizations involved in the environmental remediation of the Site.

3.3 Community Background

The Town of Windsor was founded in 1633 and is Connecticut's first community. Settlers sailed from Plymouth Colony in Massachusetts to establish themselves at the confluence of the Farmington and Connecticut rivers.

Historically, Windsor's economy has been based on tobacco farming and brick making. In its heyday, there were than 40 brickyards in Windsor. The last one disappeared in the 1960s. The first tobacco crop was planted in 1640 with seeds brought to Connecticut from the Virginia plantations.

Currently, Windsor's industrial base encompasses a wide range of products and services, including insurance, software development, energy research and development, and the manufacturing of engine components and machinery.

The town is organized under the Council-Manager form of government. The legislative function consists of a bipartisan Council of nine members, who are elected biennially for two-year terms. The Town Council elects a Mayor from its membership for a two-year term and also appoints the Town Manager.

Windsor has a population of 28,862 (2006) of which 12,231 (2006) are ethnic minorities. Fifty-eight percent have attended college. Total town school enrollment is 2,051 (2004-2005 school year) with 4,324 students

attending the Windsor School District. The median price of homes is \$233,000 (2005) with 23.9 percent of homes built before 1950. The poverty level is 3.7 percent (1999).

3.4 Community Concerns

Telephone interviews were conducted in 2007 with Windsor and Bloomfield residents, town officials, and civic leaders to identify community concerns. Some 30 residents were contacted. To document changes in public sentiment, the same list of residents who participated in the 1999 survey were interviewed with additional names added where phone numbers are no longer current.

The current round of interviews revealed the following community concerns:

- The community trusts that the cleanup will be completed appropriately.
- Final conditions following the cleanup will be safe for future uses.
- Environmental quality and public safety of the Rainbow Reservoir in the Farmington River.
- Future Site uses (will the land be available as a park, or for industrial/commercial redevelopment?).

The majority of residents felt the most important environmental concern included the risk of radionuclides in the soil and groundwater, and basically any hazardous substance that would adversely impact the environment or the community (property values), and concern for general health and safety of the community. Also of concern was the final disposition of the waste generated as a result of the cleanup of FUSRAP-designated areas.

For residents who are aware of the previous cleanup efforts both at the CE Windsor Site and the former S1C Facility, there was little concern for cross-contamination or impacts to the environment. This is slightly different from earlier surveys, and shows that the level of trust and/or education in the community has increased since the first survey. A small number of town officials wanted to know if ABB is complying with the appropriate laws and that proper care will be given to cleanup activities. There was a request that state agencies, namely CTDEP, would be involved and provide oversight. This was followed by a request that, upon completion, approval letters or documentation from federal or state agencies would provide comfort that the work was being completed properly.

There was a common concern to keep the public informed either by web-based information that can be searched using a common search engine such

as Google®, or by using the Town of Windsor's subscription-based e-mail distribution.

In 1999, three residents had no comments, while 14 did not respond. During the August 2007 survey, 11 residents had no comments and nine did not respond.

3.5 Opportunities for Public Involvement

Public involvement opportunities will be made available, based on the level of community interest expressed in the Site and its remediation plans. Up-to-date information will be prepared and disseminated to the local media, community groups, local officials and other interest groups who request it, as sampling activities and data analysis work are completed. Response to all documents prepared during the process of evaluating the CE Windsor Site will be available to the public, and requests made to federal agencies or Site coordinators will be done in a timely manner. Public meetings or briefings will be scheduled to allow community interaction and information dissemination, if appropriate and requested.

In addition to the above-noted public involvement opportunities, public notices will be published and public comment periods will be held at key milestones in the remediation process in accordance with NRC requirements and the CTDEP-issued Stewardship Permit. These activities are summarized as follows:

- A notice of NRC license termination will be published in the Federal Register (no public comment period is required).
- A public notice will be published in the Journal Inquirer prior to completion of remedial activities, along with a 45 day public comment period.
- A public notice will be published in the Journal Inquirer to provide notification of the CTDEP Commissioner's tentative determination that remediation is complete, along with a 45 day public comment period.

3.6 Potential Activities

Based on the community information needs and requests, a variety of communication techniques and community relations activities can be implemented to ensure a well informed and involved community.

3.6.1 Points of Contact

One of the most important community relations initiatives that support the nurturing of effective partnerships with community

members is the establishment of points of contact with both the local organization and the federal agency with oversight of the remediation program. Points of contact should be established and communicated to local and state officials, media and other community stakeholders and should remain accessible for information exchange and have the authority to speak on behalf of their organizations.

All inquiries about activities on the CE Windsor Site should be referred to Ronald C. Kurtz, Director of Media and Community Relations for ABB Inc. 2000 Day Hill Road, Windsor, CT 06095 (860) 285-3887.

3.6.2 Fact Sheets

Fact sheets will be developed to provide brief informative descriptions of the CE Windsor Site, the status of studies and remedial actions, the process of remediation, and other special interest topics as requests arise.

Fact sheets are typically one- to two-page information pieces that give concise explanations in laymen's terms of a particular site or program. They are intended to give an overview to the general public audience and usually include graphics, photographs, and other visuals to support the narrative.

During the interview process, a number of respondents indicated the need for easy-to-understand information materials about the CE Windsor Site. Some community members may not be indicating an interest in the Site because they may not understand the levels of contamination or the technical aspects of the program. If offered clear, concise information in simplified terms, the community members with an interest will have a better knowledge level from which to pursue additional information, if necessary, or become more involved in the cleanup process.

3.6.3 Media Releases, Media Briefings, Editorial Boards

Media releases will be developed at noteworthy points in the remediation program when new or updated information warrants, and distributed to local newspapers and other media outlets that have previously expressed interest in the program.

Media Briefings/Editorial Boards can be arranged if media representatives have the need for additional background on the CE Windsor Site, radiological contamination, or cleanup program.

These briefings typically serve as good discussion stimulators and forums for information exchange with the agencies responsible for the site and the media representatives who keep a pulse on the local community and their concerns.

Most community interviewees (2007) suggested that additional update articles should appear via electronic distribution either by a web base search or by e-mail, so that more people will have access to the information. As a result, ABB created a website for local access (www.windsorsitereclamation.com). Others prefer to see articles in the Hartford Courant or other local papers. Both methods of communication will require working with reporters and editors to facilitate the publication of significant program milestones.

3.6.4 Public Notices

Formal public notices will continue to be published in local newspapers to inform community members of significant events in the process of remediation, such as public hearings, public comment periods, availability of certain documents and other regulatory requirements. These notices are to appear in prominent positions in popular local publications to ensure those members of the community, with an interest in the program, can read them in adequate time to participate in the program.

In accordance with the requirements of the Stewardship Permit issued by the CTDEP in September 2009, public notices will be published prior to the start and completion of chemical-related remedial activities at the Site. A copy of the notice will be submitted to the CTDEP Commissioner at least ten days prior to the publication date of the notice. Within 30 days after the end of the public comment period, a written summary of all comments received and responses to each comment will be submitted to the CTDEP Commissioner.

To comply with the public participation requirements specified in the Stewardship Permit, the following public notices activities will be conducted prior to commencement of remedial actions at the Site:

- Publish a notice in a newspaper having substantial circulation in the municipality in which the Site is located;
- Broadcast a notice on a radio station during the high volume listening times on the same day the notice is published;
- Provide a copy of the notice to the Director of Health of the municipality where the Site is located;

- Provide a copy of the notice to the owner or operator of the Site and to persons on the facility mailing list; and
- Erect and maintain a sign at least six feet by four feet for at least 30 calendar days in a legible condition at the Site, clearly visible from the public highway, stating that “Environmental cleanup in progress at this Site” and provide a telephone number that any interested person may use to obtain additional information about the remediation.

Prior to the CTDEP Commissioner’s final determination that remediation is complete, the following public notice activities will be conducted:

- Publish a notice in a newspaper having substantial circulation in the municipality in which the Site is located;
- Broadcast a notice on a radio station during the high volume listening times on the same day the notice is published;
- Provide a copy of the notice to the owner or operator of the Site and to persons on the facility mailing list; and
- Include a summary of the basis for the Commissioner’s determination and that the Commissioner will accept public comments on the tentative determination for at least 45 calendar days from the date of publication.

In accordance with NRC requirements, following successful completion of radiological remediation activities and Final Status Surveys, a notice of NRC license termination will be published in the Federal Register (no public comment period is required).

3.6.5 Information Repository

An information repository has been established at convenient locations open to the public so community members can review the documents, fact sheets, brochures and other written materials related to the on-going remediation activities on the CE Windsor Site. The information repository is intended as a resource to the public so they can become more aware of on-site activities related to the remediation, as well as general information about Superfund sites, the process for cleanup, and background on radioactive materials.

Documents related to chemical and radiological investigation and remediation activities are on file in the Verification Room at the CE Windsor Site and are available for public review (by appointment only). These documents are also available for public review at the CTDEP offices in Hartford, Connecticut. Additionally, select

documents related to the on-going remediation activities are available for public review at the Windsor Public Library.

3.6.6 Administrative Record

An Administrative Record has been established and made available to the interested public so they can have access to the same information that regulators and other decision makers will use to identify potential cleanup alternatives for the Site. The Administrative Record is the legal file that includes all relevant information leading up to a final decision for the site. The Administrative Record is maintained in the Verification Room at the CE Windsor Site and is available for public review (by appointment only).

3.6.7 Local Officials Briefings

Briefings to local officials will continue to be scheduled on a regular basis to keep community leaders involved and informed as to the progress of remediation plans, schedule updates, results of sampling activities, and other environmental issues. These briefings will give local officials the opportunity to refer questions to the proper federal agency authorities and resolve any community concerns. Briefings will continue to update local officials with highlights of upcoming activities in the remediation plans and prepare them for each stage of the program. This will prepare officials with the most up-to-date information so they can adequately respond to requests from their constituents.

Currently, ABB provides annual updates to the Windsor Town Council and conducts periodic informal briefings with local officials on an as needed basis.

3.6.8 Neighbor Updates

Future neighbor updates will similarly provide the latest environmental analysis to residents within a one- to two-mile radius of the CE Windsor Site. Neighbors may also want additional background information about the source of radiological contamination and the potential health and environmental impacts.

Neighbor updates can take the form of small meetings, direct mailings, or periodic newsletters or bulletins, based on feedback from residents on the best way to communicate to them.

3.6.9 Public or Town Meetings

Public or town meetings can continue to be planned, if special needs arise or if it appears that enough interest exists to make the meeting beneficial. This type of forum is usually less interactive than smaller meetings or briefings with fewer opportunities to hear everyone's perspectives, but there are occasions when a public meeting is the best way to get a large number of people together for the information exchange.

The meeting can include a number of posters, exhibits and displays that give audience members graphic representations of Site characterization activities, environmental findings, cleanup alternatives, or program schedules to help put into perspective the complexity that surrounds a cleanup of this type. This often helps community members understand why a cleanup program is so time consuming.

3.6.10 Direct Mailings

ABB has provided direct mailings of the "Environmental News" newsletter to allow people to review information and formulate questions and requests at their convenience. An extensive and accurate mailing list of community members has been developed for the Site. This list readily provides access to interested community members and was updated in August 2007.

3.6.11 Comment Periods and Comment Responses

The public will be given various opportunities during the Site remediation to comment on documents and to receive comment responses from the program managers. This allows the public a formal vehicle to register questions, comments, concerns, or suggestions about plans for the cleanup. Formal comment response documents will be prepared by ABB so the public gets feedback on their comments and knows how the comments are being incorporated into final decisions.

3.7 Schedule

ABB began a Community Relations Program in 1999 that has since kept the community informed on a continual basis. The program consisted of newsletters mailed to residents on a biennial basis, annual updates before the Town of Windsor mayor and council members, poster sessions held at the town hall to update the community, legal notices placed in newspapers as required, a newspaper article on the progress of the site cleanup, and

availability to receive phone calls and answer questions residents may have. All required materials were placed in a repository for public access and a spokesman has been identified.

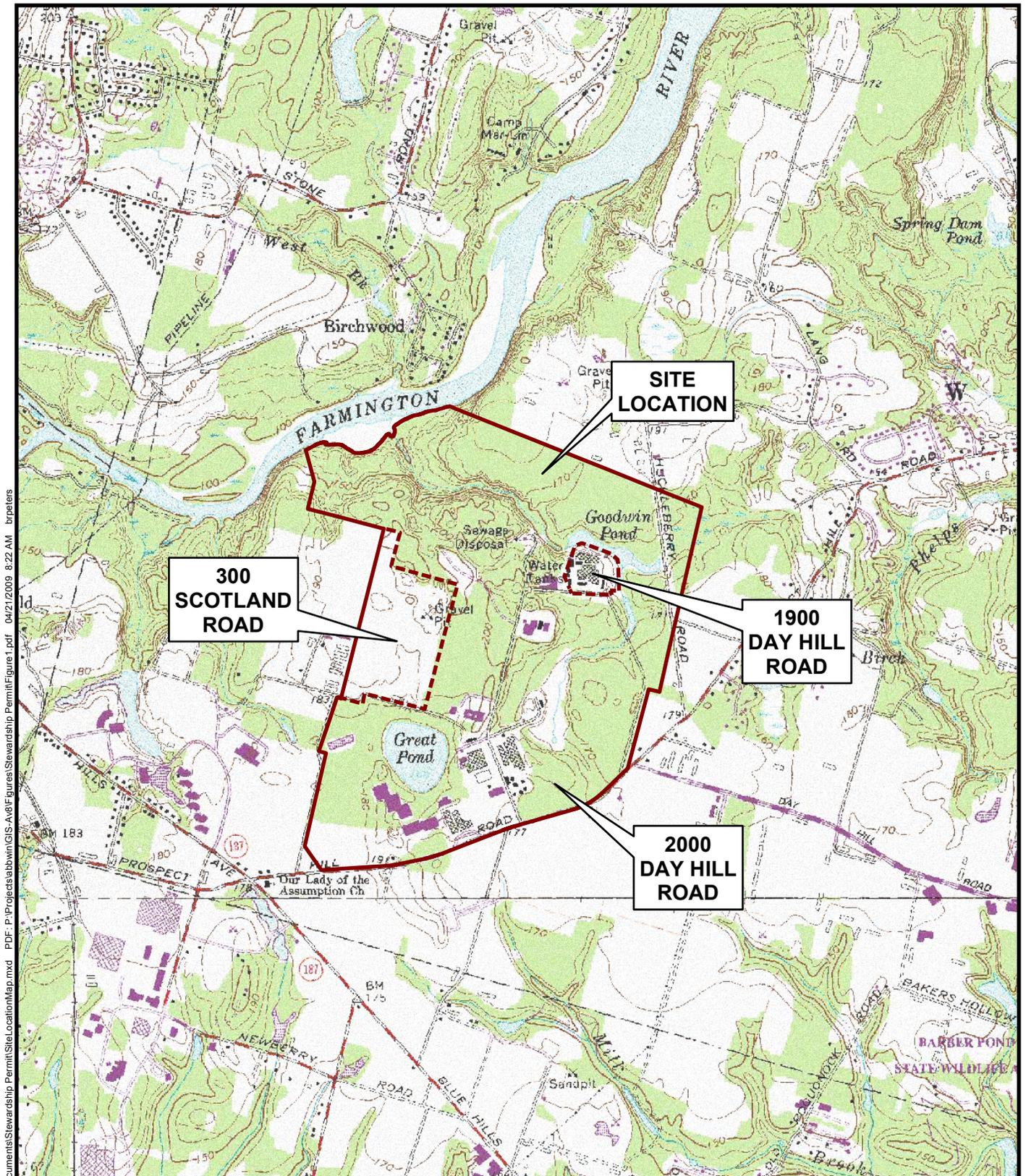
4.0 References

ABB, 2007. Community Relations Plan or the Combustion Engineering Site; Windsor, Connecticut. September, 2007.

CTDEP, 2009. Stewardship Permit: ABB Inc.; 2000 Day Hill Road; Windsor, CT; EPA ID No. CTD001159557; Permit No. DEP/HWM/CS-164-007; September 29, 2009.

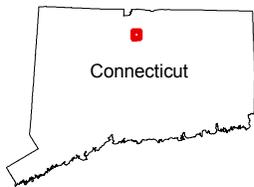
HLA 1999. Community Relations Plan, Combustion Engineering, Inc., 2000 Day Hill Road, Windsor, Connecticut 06095, Harding Lawson Associates, April, 1999.

Figures



Document: P:\Projects\ABBWIN\GIS-Ave\MapDocuments\Stewardship Permits\Site Location\Map.mxd PDF: P:\Projects\ABBWIN\GIS-Ave\Figures\Stewardship Permits\Figure 1.pdf 04/21/2009 8:22 AM brpetters

Index Map



Map Source: 1:24,000 scale digital topographic map obtained from Environmental GIS Data for Connecticut, 2003 Edition, State of Connecticut Department of Environmental Protection. Windsor Locks, CT 1964, Photorevised 1984.

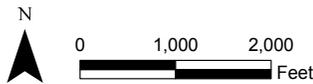


Figure 1
Site Location

CE Windsor Site
Windsor, Connecticut

Prepared/Date: BRP 04/21/09 Checked/Date: APP 04/21/09

MACTEC, Inc.

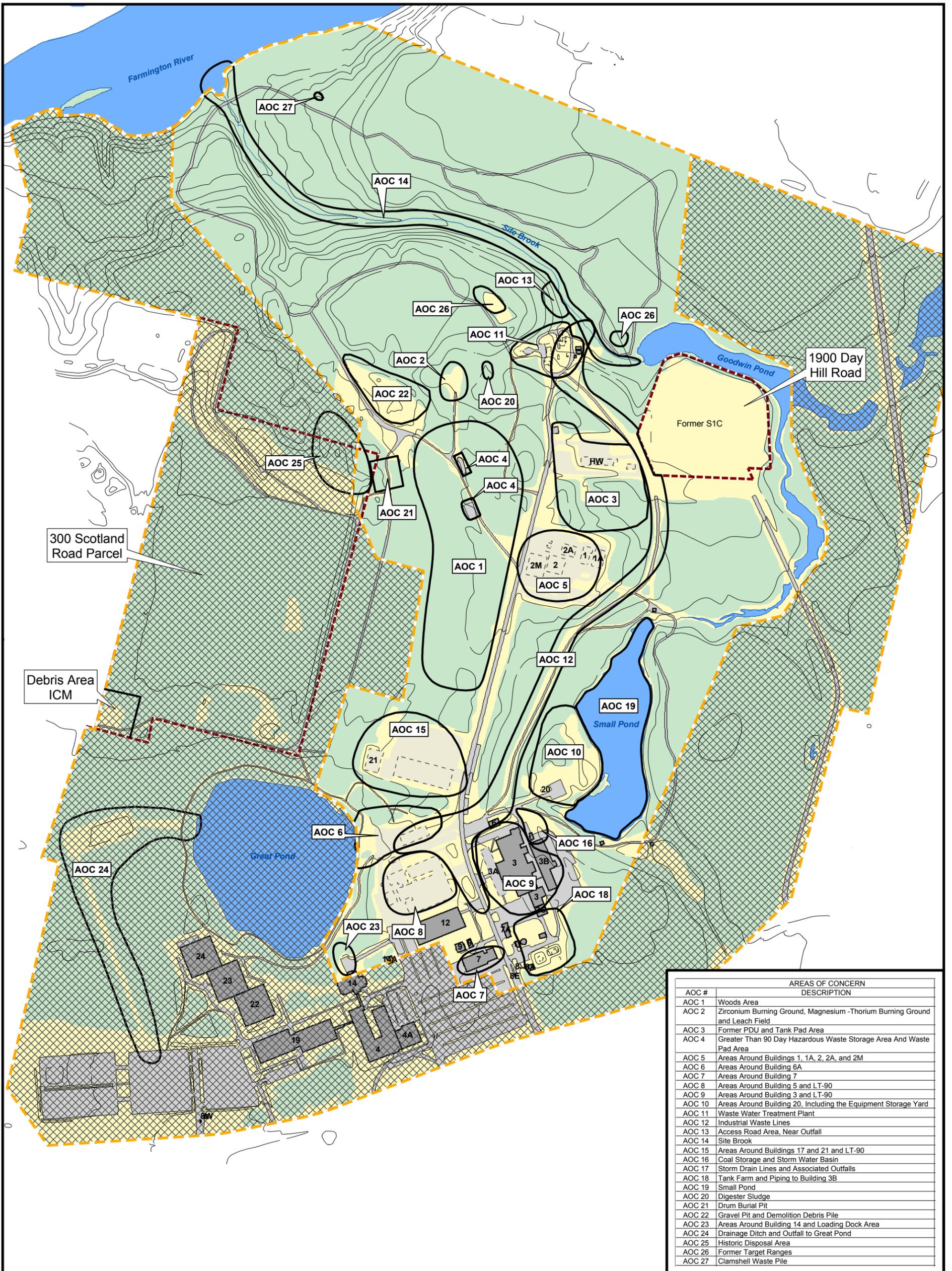
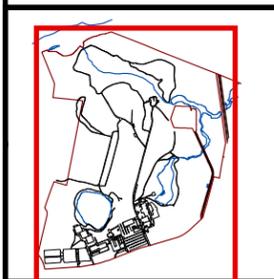


Figure 2
Site Overview

CE Windsor Site
Windsor, Connecticut
MACTEC, Inc.



Legend

- RCRA Partial Release Area
- AOCs
- Index Contour (10')
- Former Building
- Former Paved Areas
- Building
- Forest
- Open
- Water
- Road

Prepared/Date: BRP 04/21/09 Checked/Date: APP 04/21/09