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PUBLIC INVOLVEMENT PLAN

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Nuclear Metals, Inc. Disposal Site  
2229 Main Street  
Concord, Massachusetts

Prepared by:

Massachusetts Department of Environmental Protection  
Northeast Regional Office  
Site Assessment and Cleanup Section  
10 Commerce Way  
Woburn, MA 01801

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NUCLEAR METALS, INC. DISPOSAL SITE  
CONCORD, MASSACHUSETTS

I. INTRODUCTION

On January 10, 1990, the Department of Environmental Protection (DEP, formerly the Department of Environmental Quality Engineering or DEQE) received a petition from the Concerned Citizens of Concord. The petition requested that the Nuclear Metals, Inc. disposal site be designated as a Public Involvement Plan site, under Section 14(b) of Massachusetts General Law Chapter 21E.

Under the Massachusetts "Superfund" Law (M.G.L. C. 21E), DEP is responsible for overseeing remedial response actions at sites at which oil or hazardous materials have been released to the environment. Remedial response actions include determining the nature, source and extent of the contamination; risk posed by the site; whether cleanup actions are necessary and if necessary, determining and implementing the most appropriate actions. In addition, the remedial response action process provides opportunities for public involvement throughout the process. The remedial response action process is established by the Massachusetts Contingency Plan (310 CMR 40.00).

Public involvement during the remedial response action process is undertaken to ensure that the public is both informed of and involved in planning for remedial response actions. For disposal sites at which the public indicates interest in becoming involved in this process, DEP designates the site as a Public Involvement Plan (PIP) site, and prepares a plan which identifies specific activities that will be undertaken to address public concerns to the extent possible. The draft Plan is reviewed by the public and revised, where appropriate, based on comments submitted to DEP. The final Plan is then implemented in conjunction with the development and implementation of remedial response actions for the disposal site. Due to public concerns about the Nuclear Metals site, DEP has designated the site a Public Involvement Plan site, pursuant to the Massachusetts Contingency Plan.

This document is the Public Involvement Plan for the Nuclear Metals disposal site. Section II contains background information on the site, including a site and public involvement history. Section III explains how the remedial response action process addresses community concerns which have been raised during the development of the Public Involvement Plan. Section IV explains the public involvement activities which will be implemented during the remedial response process. Section V outlines the roles and

responsibilities of those involved in carrying out the Public Involvement Plan. Section VI explains how the Plan may be revised in the future.

DEP presented the draft Plan for review at a public meeting which was held on November 14, 1990, at the Harvey Wheeler Community Center, 1276 Main Street in Concord at 7:00 pm. This meeting also provided an update on the remedial response action planning process for this site. Anyone who wished to comment on the draft Public Involvement Plan was encouraged to do so. Comments were submitted at the meeting, or by telephoning or writing to Karen Stromberg, DEP Northeast Regional Office, 5 Commonwealth Avenue, Woburn, MA 01801 (telephone: 617/935-2160). Comments were accepted until December 7, 1990.

## II. BACKGROUND INFORMATION

### A. Site History

Nuclear Metals, Inc. occupies 30 acres of an industrial park in West Concord. The property is bounded to the north by Route 62; adjacent property to the east, west and south are unoccupied. Groundwater on the Nuclear Metals property has been found to flow toward the north, discharging to the Assabet River.

Nuclear Metals has been in operation at the site since 1958, manufacturing special tools and projectiles from depleted uranium. Wastes generated from this process include low-level radioactive waste and acid pickling waste. Prior to 1986, the acid pickling waste was neutralized with lime before its discharge to an unlined holding basin on-site. The pickling process used nitric acid to remove copper and steel jacketing from uranium extrusions. Presently, a closed loop wastewater treatment plant treats the process wastewater. In addition, the company utilizes two on-site water supply wells for non-contact cooling water which is discharged to a recharge pond. Two septic systems are used for disposal of sanitary sewage.

In March 1980, the Department analyzed samples from Nuclear Metal's water supply well for volatile organic compounds (VOCs) and detected eight contaminants ranging in concentration from 0.4 micrograms per liter (ug/l) to 5990 ug/l. At the recommendation of the Department, Nuclear Metals closed the supply well and connected to the town water supply. At the same time, the other town water supply wells were sampled for VOCs and none were detected. In May 1980, the Department sampled two private wells on the Haney Press property, northwest of the site. VOCs were detected in one of the wells and it was closed.

Upon discovery of the contaminated supply well in 1980, Nuclear Metals hired Goldberg-Zoino Associates (GZA) to perform a hydrogeologic investigation of the site. VOCs were found to be widely distributed in groundwater throughout the site. Contaminants were detected in the main water supply well, deep rock production well, cooling water outfall, septic system, holding basin monitoring wells and other on-site wells, and in the Assabet River and its tributaries. A total of fourteen compounds were detected, with trichloroethane present in the main water supply well at 9800 (ug/l).

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Up until 1984, trichloroethane was stored in an above-ground storage tank outside the facility. This tank was regularly inspected and no leaks or spills were reported. In May 1984, Nuclear Metals replaced its use of trichloroethane and switched to Freon 113.

Initial groundwater sampling was conducted on the site in December 1981 and July 1982. In January and June of 1983, GZA conducted extensive sampling and analysis of the groundwater at the site, as proposed in their 1982 "Groundwater Quality Monitoring Program". The program included semi-annual monitoring required by the Town of Concord. The results of this sampling were presented in GZA's September 1983, "Report on Annual Sampling Round January 1983 and Semi-Annual Sampling Round June 1983". Semi-annual sampling has been conducted every year since then.

Wells next to the holding basin showed elevated concentrations of copper, titanium, and molybdenum. Wells downgradient showed greatly reduced concentrations of metals. Elevated concentrations of uranium were detected in samples taken from the septic tank and deep rock production well, but samples from the holding basin monitoring wells were all below 2 ug/l. Concentrations of VOCs were greatly reduced compared to previous samples. Additional compounds were found in significant concentrations in the holding basin wells and septic tank, including, methyl ethyl ketone and acetone. Acetone is used at the Nuclear Metals facility, but methyl ethyl ketone is not and was only detected in one sample.

In October 1984 and April 1985, GZA conducted further sampling. Results are presented in GZA's June 1985, "Annual and Semi-Annual Sampling Rounds, October 1984 and April 1985". Two monitoring wells located just downgradient of the holding basin showed nitrate, copper and uranium. In October, copper concentrations in two monitoring wells exceeded the secondary drinking water standard. Uranium was detected at a total concentration of 230 and 270 ug/l in both wells.

In April, nitrate and copper concentrations decreased, but uranium concentrations in one of the monitoring wells increased to 540 ug/l. Uranium was also detected downgradient at lower concentrations in samples from the septic tank.

Nuclear Metals discontinued their discharge into the holding basin by the end of 1985 and the basin was capped with a hypalon cover. Nuclear Metals is required to submit a plan to the Nuclear Regulatory Commission (NRC) for the removal of radioactive sludge from the site for disposal in a secure landfill. The holding basin currently contains an estimated 1/2 million pounds of depleted uranium and 1 million pounds of copper. Nuclear Metals is currently pursuing disposal options for the holding basin sludge with a landfill in Utah which is waiting for a state license, and recycling options for the recovery of depleted uranium, copper and lime for reuse.

The closure of the holding basin is not regulated under M.G.L. c. 21C (the Massachusetts Hazardous Waste Management Act) because Nuclear Metals is not a treatment, storage or disposal facility and the waste in the holding pond is not classified as a waste under M.G.L. c. 21C. Because of this, the Department decided in 1985 that the problem of environmental contamination at Nuclear Metals could be best addressed under M.G.L. c. 21E, which had been promulgated in 1983. The waste present in the holding basin is considered a hazardous material under c. 21E based on its radioactive characteristics. In addition, the presence of VOCs in the groundwater, along with radioactivity and metals, document a release of hazardous material at the site, subject to regulation under c. 21E.

In December 1988, Nuclear Metals applied for a Waiver of DEP Approvals under the Massachusetts Contingency Plan, 310 CMR 40.537. To be eligible for a waiver, a site must be classified as a non-priority site, in accordance with 310 CMR 40.544. DEP classified the site as a priority site, because there is evidence of groundwater contamination with hazardous materials at the site at levels exceeding drinking water standards [40.544 (2) (c)], and the evidence of groundwater contamination has been found in private water supply wells [40.544 (2) (c)(2)]. Therefore, the site was not eligible for a waiver and the application was denied.

Three off-site private wells were sampled by DEP in January 1988, and analyzed for VOCs, uranium, gross alpha and beta activity, and nitrates. VOCs were detected in the well that supplies drinking water to an ice arena, however, none were detected in the two other wells which supply office buildings. Review by DEP's Office of Research and Standards concluded that levels of VOCs were all below drinking water standards and therefore acceptable for human consumption, but advised continued

monitoring to ensure concentrations do not increase. Levels of uranium, and alpha and beta activity were found to be within the range of background.

On February 12, 1988, DEP issued a Notice of Responsibility (NOR) letter to Nuclear Metals, formally notifying them of their liabilities and responsibilities under c. 21E. The letter also required Nuclear Metals to provide sufficient data to DEP to determine what, if any remedial actions are warranted at the site.

In response to the NOR, a Phase I Preliminary Assessment report titled "~~Assessment of Water Quality~~" was prepared by GZA in April 1988. The report concluded that no further action was warranted at the site and that the metal hydroxide sludges were stable in the holding basin. Feeling the need for additional information regarding conditions at the site, DEP tasked its contractor, Roy F. Weston, to provide guidance on: 1) the fate and transport of uranium in the environment; 2) environmental monitoring of appropriate radioisotopes and interpretation of data; 3) interaction of solvents and metals that may effect migration in groundwater; and, 4) regulatory involvement of NRC regarding the holding basin. Roy F. Weston submitted a "Review of the Nuclear Metals, Inc. Facility, Concord, Massachusetts" to the Department in May 1989.

GZA submitted a Scope of Work for a Phase II Comprehensive Site Evaluation on March 7, 1990. DEP responded on May 16, 1990, indicating that the proposal did not accomplish the objectives of a Phase II investigation necessary for the site. Nuclear Metals has subsequently provided DEP with additional Phase II information. DEP is currently discussing the requirements for a revised Phase II Scope of Work with Nuclear Metals. When the revised Scope of Work is completed it will be made available for public comment.

#### B. Public Involvement History

In 1982, Nuclear Metals requested a zoning change from the Town to expand their facility. In response to this request, a group called the Concerned Citizens of Concord (CCC) formed to deal with issues about the facility that were of concern to them at the time. Issues included noise, pollution, odor and the need for a fence around the holding basin to prevent access. The Board of Appeals issued a conditional approval to Nuclear Metals, which addressed some of the concerns raised by CCC. Nuclear Metals was required to design and implement a complete groundwater monitoring program, approved by the Board of Health. The wells are to be monitored semi-annually, with results submitted to the Board of Health and Town Manager. In addition to the groundwater information, Nuclear Metals was also required to monitor and report

on the amount of material flowing into the holding basin and air emissions from the facility. Results are presented at Board of Health meetings, and CCC members have attended many of these meetings.

In December 1989, CCC sponsored a resolution for Town meeting which would ban the disposal of any radioactive waste from the Town landfill. This resolution was in response to a policy under consideration by the NRC to declare some nuclear waste "below regulatory concern", which means it could potentially go to a local landfill.

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CCC became focused again on Nuclear Metals, as they are a local producer of radioactive waste. CCC was also concerned about the potential impacts of the Low Level Radioactive Waste Policy Act. The Act says that if Massachusetts does not have the capacity to dispose of its nuclear waste by 1993, then any waste must remain on the site of generation.

On January 10, 1990, DEP received a petition from CCC stating that they were "disturbed about the possibility that Nuclear Metals is discharging dangerous amounts of toxic contaminants, both radioactive and nonradioactive, into the atmosphere or the groundwater", and requested that the site be designated a PIP site. DEP formally responded to the petition on January 17, 1990, indicating that the site had been designated a PIP site and DEP would prepare a draft Public Involvement Plan.

In developing this Public Involvement Plan, DEP took several steps to identify community concerns that the Plan must address. Documents in DEP's files relating to the Department's past involvement with the site and the community were reviewed; DEP met with several petitioners in March 1990; and interviews were conducted with key officials and individuals interested in the site in June, July and August 1990. Community concerns identified during community interviews are listed in Exhibit I.

### III. ADDRESSING PUBLIC CONCERNS

The process for assessing and cleaning up disposal sites as set forth in the Massachusetts Contingency Plan (310 CMR 40.00), is designed to address the effects of the site on health, safety, public welfare, and the environment. Once a release of oil or hazardous materials has been confirmed at a disposal site (Phase I of the remedial response action process), the process proceeds to:

- a comprehensive field investigation of the nature and extent of the contamination, and an evaluation of any risks posed to the public and the environment from the site (Phase II),
- identification and evaluation of remedial response action alternatives and selection of feasible measures that will achieve a permanent cleanup at the site (Phase III), and
- implementation of the selected remedial response actions (Phase IV).

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Physical work at a disposal site includes sampling and other environmental field testing, and the implementation of the selected remedial response actions. It may also include the implementation of measures designed to stabilize conditions at the site to prevent the continued migration of contaminants or eliminate an imminent threat to public health, safety welfare or the environment until planning for remedial response actions is underway (i.e., Interim or Short Term Measures).

At each step of the remedial response action process, plans for work are developed, the work is conducted, and reports describing results and recommendations for the next step are prepared. The documents which describe each of these steps are the cornerstone of the remedial response action planning process, since they provide both the Department and the public with the information necessary to make decisions about how a site should be cleaned up.

As noted in Exhibit 1, the public has raised a number of concerns about the Nuclear Metals disposal site. The remedial response action planning process is designed to address the concerns about the nature and extent of contamination, risks posed to health, safety, public welfare and the environment, and the adequacy of proposed cleanup measures. These concerns will primarily be addressed in Phases II and III of this process. For example, the assessment of off-site contamination is considered in Phase II, as is the impact of the disposal site on public health and the environment. Phase III will address the adequacy of proposed remedial response actions to provide permanent solutions for the contamination problems at this site.

Some of the public's concerns about the Nuclear Metals site cannot be addressed under DEP's site assessment and cleanup process. Specifically, concerns related to:

- Contingency plans for the Nuclear Metals facility - Issues related to the treatment, storage and disposal of Nuclear Metals' hazardous wastes, including contingency

plans for accidents at the facility, are regulated under M.G.L. c. 21C and 310 CMR 30.00. DEP's Hazardous Waste Management Section is responsible for administering this program.

- Reduction of Nuclear Metals' waste - The Massachusetts Toxic Use Reduction Act was passed into law to reduce the production, use and release of toxics. It sets a statewide goal to reduce the amount of toxic waste generated by 50% by the year 1997. For further information about the Act, call DEP's information line at 617/292-5652.

- Nuclear Metals' employee health statistics and exposure records - DEP has no authority to require this information under M.G.L. c. 21E or the MCP. Health related issues are best addressed by the Massachusetts Department of Public Health at 617/727-7170.

Other concerns about the availability of information and opportunities for the public to comment on documents, and the accuracy of documents produced by consultants, are related to the process that DEP has established to ensure that the public is involved in planning for remedial response actions. To address these concerns, DEP has presented several public involvement activities in this Public Involvement Plan that are intended to provide information directly to Concord residents and officials, and to provide opportunities for the public to comment on documents. These activities are described in Section IV of this Plan.

#### IV. PUBLIC INVOLVEMENT ACTIVITIES

In accordance with the Massachusetts Contingency Plan (40.200), activities undertaken to involve the public in response actions serve two purposes:

- for all disposal sites, public involvement activities inform the public of risks posed by the disposal site, the status of remedial response actions, and the opportunities for public involvement; and
- for Public Involvement Plan Sites, public involvement activities solicit the concerns of the public about the disposal site and remedial response actions, so that to the extent possible, these concerns can be addressed and

incorporated in planning and implementing response actions.

To meet each of these objectives, DEP will ensure that specific public involvement activities for the Nuclear Metals disposal site are undertaken. The activities presented in this Public Involvement Plan have been selected in light of the concerns described in Exhibit 1. These public involvement activities are described below.

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#### Activities for Providing Information

##### 1. Information Repositories

Publicly Accessible Site File: A file on the Nuclear Metals disposal site is maintained at the DEP Northeast Regional Office. The file contains all documents pertaining to the site, with the exception of enforcement sensitive material. Appointments to view the file can be made by contacting Holly Migliacci, DEP/Northeast Regional Office, Site Assessment and Cleanup Section, 10 Commerce Way, Woburn, MA 01801 (telephone: 617/935-2160).

Local Information Repositories: To provide Concord residents with easy access to information relevant to the site cleanup process, DEP has established an Information Repository at the Concord Public Library, 129 Main Street. This repository contains information such as: official correspondence, scopes of work, reports and documents regarding the site; the Public Involvement Plan; briefing summaries; and summaries of responses to comments received. Library hours are: Monday through Thursday 9:00 am - 9:00 pm; Friday 9:00 am to 6:00 pm; and Saturday 9:00 am - 5:00 pm. Information is sent to the repository as it becomes available. Information is also sent to the Concord Board of Health. If you wish to review the files at the Board of Health, please call 508/371-1034 to make an appointment.

##### 2. Site Mailing List

DEP has established a mailing list of concerned citizens, government officials, organizations, and the news media to keep the public informed during the remediation process. DEP maintains the list and updates it as necessary. A copy of the list was also given to Nuclear Metals so they can perform required mailings. If you are not already receiving information about the Nuclear Metals site from DEP and would like to be added to the site's mailing

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list, please contact Karen Stromberg, DEP/Northeast Regional Office, Site Assessment and Cleanup Section, 10 Commerce Way, Woburn, MA 01801 (telephone: 617/935-2160).

### 3. Notification to Local Officials and Residents of Major Milestones and Events

The Massachusetts Contingency Plan requires community notification of major planning and implementation milestones at disposal sites. Major milestones include: 1) the start of field work, related to response actions, involving heavy equipment or ~~protective clothing (level A or B protection), 2) the end of a~~ phase of the remediation process, and 3) the start of any Short Term Measures.

Notification of field work will include information on the type of work and its approximate duration. Notification will be made by Nuclear Metals to the people on the Notification List by telephoning the day before the activity will begin. Notification at the end of a remedial phase will include a summary of the Phase Report and information on where the report can be reviewed. This notification will be made after the Phase Report has been approved by DEP for distribution. Those to be notified include:

Alan Edmond  
Town Manager  
P.O. Box 535  
Concord, MA 01742  
508/369-6700

Bradford Leach  
Health Officer  
133 Keyes Road  
Concord, MA 01742  
508/371-1034

Mary Jane Williams  
Citizens Concerned  
about Nuclear Metals  
204 Nashawtuc Road  
Concord, MA 01742  
508/369-0024

Representative Pamela Resor  
State House - Room 33  
Boston, MA 02133  
617/722-2060

Senator Lucille Hicks  
State House - Room 413G  
617/722-1572

In addition, Concord Police and Fire Departments will also be notified in situations where public safety is a concern.

### Opportunities for Public Input

#### 1. Public Comment Periods for Documents

When key documents are available in draft form, they will be provided to the Information Repositories, and a notice of their

availability will be sent to the site mailing list. The notice will include the title of the document, where it is available for review, information about how to submit comments to DEP, and the length of the comment period. DEP will determine the length of the comment period, which will normally be 20 calendar days, but may be longer if warranted by the complexity of a particular document. Nuclear Metals will be responsible for providing document copies to the Information Repositories and sending out notices of availability for documents it prepares. DEP will make available any documents it produces.

Documents available for comment routinely include Scopes of Work for Comprehensive Site Assessments and their subsequent results (Phase II), evaluations of the feasibility of alternative remedial response actions and the Final Remedial Response Plan (Phase III), design plans for the selected remedial response alternative and the Remedial Response Implementation Plan (Phase IV), and plans for Short Term or Interim Measures.

## 2. Public Meetings

DEP will conduct public meetings to brief the public on the status of the Nuclear Metals disposal site during the remedial action process. Meetings will take place when the Phase II (Comprehensive Site Assessment), Phase III (Development of Alternatives and the Final Remedial Response Plan), Phase IV (Implementation of the Approved Remedial Response Alternative) reports become available, and prior to any Short Term or Interim Measures. Meetings will occur before the public comment periods on these reports. Additional public meetings may be scheduled if they are requested and deemed to be appropriate by DEP.

Meetings serve two purposes: 1) to give Town officials and the general public a status report on progress made to plan and implement remedial response actions at the disposal site; and, 2) to provide an opportunity to question and comment on plans for remediation of the site. Meetings will be held jointly by DEP and the Concord Board of Health. Nuclear Metals will send a notice to those on the site's mailing list to inform them of these meetings and will send a representative to each meeting. Nuclear Metals will prepare summaries of the meetings, and place a copy of these summaries in the Information Repositories, after they have been approved by DEP.

## 3. Response to Comments

DEP will prepare a summary of comments received from the public on each document and outline its responses to these comments. A copy of this summary will be sent to all those who

submitted comments and will be placed in the Information Repositories. In addition, a notice announcing the availability of the summary will be sent by Nuclear Metals to the site's mailing list.

Please see Exhibit II for a general schedule of the public involvement activities.

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V. RESPONSIBILITIES FOR IMPLEMENTING PUBLIC INVOLVEMENT ACTIVITIES

In accordance with the Massachusetts Contingency Plan (310 CMR 40.206), implementation of certain proposed public involvement activities has been delegated to Nuclear Metals. These activities are generally those designed to provide the public with information regarding remedial response actions. They include, providing copies of reports to local officials and information repositories, mailing notices of meetings and the availability of site reports, notifying local officials and residents of major field work on the site, providing an update on the status of the site to local officials and residents, and drafting fact sheets or report summaries. DEP will conduct those activities related to obtaining and responding to public comments on proposed remedial response actions. DEP will oversee Nuclear Metal's implementation of its delegated tasks, and will also conduct the required activities for its own technical work concerning this site.

VI. FUTURE PLAN REVIEW AND AMENDMENTS

This Public Involvement Plan may be revised whenever necessary during the course of the cleanup process. If revisions are proposed, DEP will place a copy of the proposed revised Plan in the Information Repositories, and send a notice of its availability to the site's mailing list. Comments on the proposed revisions will be accepted during a 20 calendar day comment period. DEP will review any comments received and revise the Plan as appropriate. The final Plan and any revisions will be placed in the Information Repositories.

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Exhibit 1

COMMUNITY CONCERNS ABOUT THE NUCLEAR METAL DISPOSAL SITE

A. Concerns about the nature and extent of contamination:

- Nuclear Metals may be discharging dangerous amounts of toxic contaminants, both radioactive and nonradioactive, into the atmosphere or the groundwater.
- Accurate information is needed on Nuclear Metals' discharges.
- Are there any air emissions from the site and if so, what have they been?

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- Has the site been contaminated since 1958?
  - Has groundwater inside the property been contaminated? Off-site?
  - Has the Assabet River been affected by contamination from the site?
  - If the Assabet is contaminated, is there a difference in the contaminants upstream and downstream of Nuclear Metals?
  - There should be more soil and groundwater samples taken on the site.
  - There should be more wells installed to define the exact extent of the contaminated groundwater plume.
  - What contaminants are being tested for at this site?
  - Are the contaminants dangerous?
  - There is a bad odor from the facility. What is it; is it harmful?
  - The holding basin will pose a threat in the future because the Uranium in it will migrate, even if it is slowly.

B. Concerns about routes of exposure and neighborhood health problems:

- What are the threats to public health and safety from the site?

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C. Concerns about the site remediation process:

- What are Nuclear Metals' cleanup plans?
  - What is the timetable for cleanup?
  - How can the cleanup be done more quickly?
  - Nuclear Metals should be given a deadline for cleanup and then fined every day they go over the deadline.
  - There should be interim milestones established during the cleanup of the holding basin.
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- Who is doing the testing at the site?
- What agency(ies) is monitoring the cleanup?
- Waste should not be allowed to be buried on the site, it will contaminate the Town's aquifer.
- Nuclear Metals should pay for the Town to hire an independent consultant.

D. Concerns about opportunities for public involvement during the remedial response action process:

- Nuclear Metals is not sharing all the information they have on the site.
- The community has no idea what is really going on at the facility.
- The technical information on the site is overwhelming.
- There are seven different agencies involved in some way in this site and their roles should be made clear.
- Nuclear Metals should make their correspondence with EPA and the NRC available to the public.
- Residents should have the right to ask questions of Nuclear Metals and are entitled to full answers.
- If Nuclear Metals and DEP disagree, the community wants to know. The discussions should be public.

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- Public meetings should be keyed to milestones in the cleanup process.
  - Documents to be presented at public meetings should be made available to the public so that people can have question and comments ready for the meeting.
  - The public should be involved in deciding what the interim milestones are during the cleanup of the holding basin.
  - The public should know what the actual cost of the cleanup, especially of the holding basin.
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E. Other Concerns:

- What are Nuclear Metals' contingency plans for accidents at the facility?
- What are Nuclear Metals' plans for reduction of the volume of their waste; what is the timetable and what agency is monitoring this?
- What are Nuclear Metals' plans to cleanup the site if they go out of business; is there money set aside for this and is it enough?
- Nuclear Metals should post a bond for financial assurance for the cost of the cleanup.
- Nuclear Metals should disclose employee health statistics and exposure records, including employee's families.
- Local officials have been dealing with Nuclear Metals for so many years that they are not as concerned as the rest of the community about the problems at the facility.
- Nuclear Metals will have to leave their nuclear waste on-site unless there is a facility built in Massachusetts by 1993.
- There seem to be quite a few people who have died from cancer in the neighborhood. This could be from the site.
- What are the contingency plans for accidents during cleanup?

