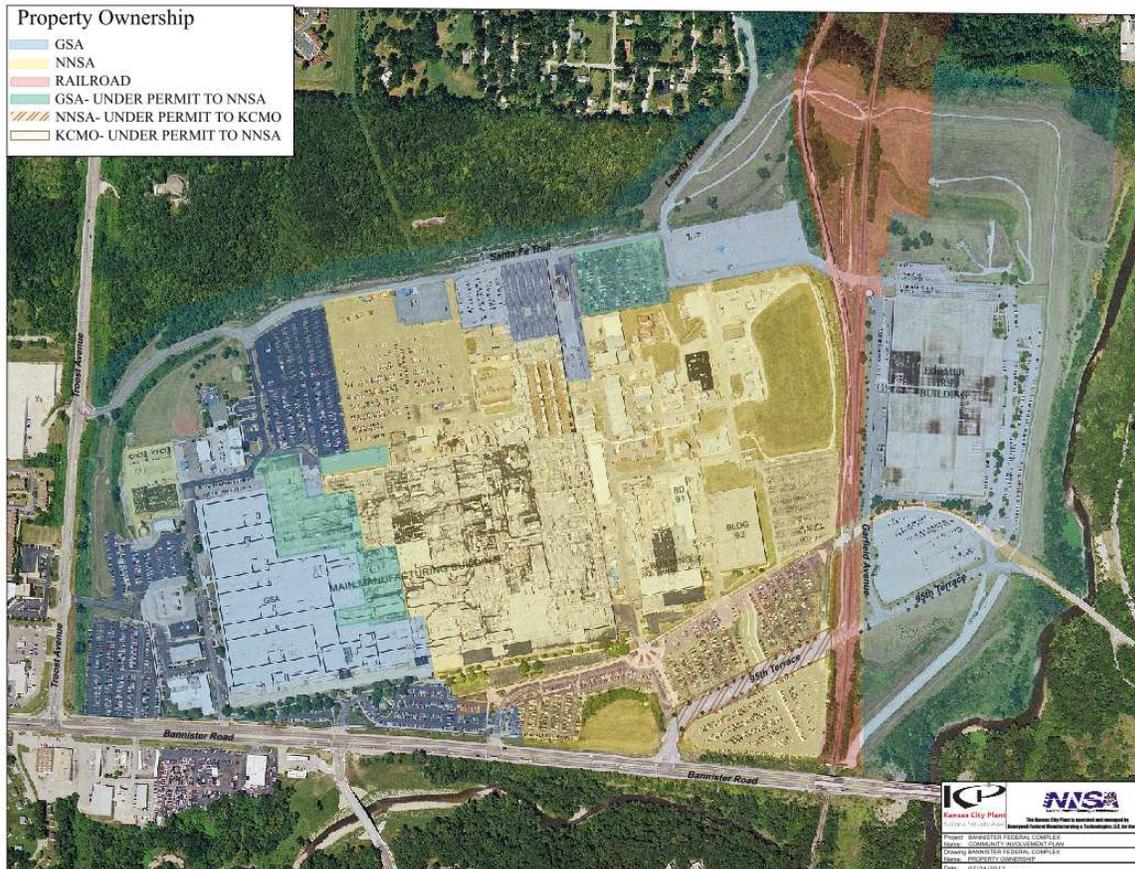


Bannister Federal Complex

Community Involvement Plan

June 2013



Prepared in accordance with Missouri Hazardous Waste Management Facility Part I Permit, Permit Number MO9890010524 and Hazardous and Solid Waste Amendments Part II Permit, Permit Number MO9890010524

Contents

EXECUTIVE SUMMARY	1
1.0 INTRODUCTION.....	2
2.0 FACILITY HISTORY	6
<i>2.1 Site Location and Description</i>	<i>6</i>
<i>2.2 BFC History.....</i>	<i>7</i>
3.0 SUMMARY OF ENVIRONMENTAL INVESTIGATIONS	14
3.1 DOE Kansas City Plant.....	14
3.1.1 Soil and Groundwater Quality	23
3.1.2 Water Quality	24
3.2 General Services Administration	24
3.3 U.S. Army Corps of Engineers.....	25
4.0 COMMUNITY INVOLVEMENT GOALS	26
<i>4.1 The BFC Community</i>	<i>27</i>
5.0 COMMUNITY INVOLVEMENT HISTORY AND CONCERNS.....	28
<i>5.1 Community Newsletters and Surveys</i>	<i>28</i>
<i>5.2 Neighborhood Meetings.....</i>	<i>28</i>
<i>5.3 Community Involvement Plan.....</i>	<i>28</i>
<i>5.4 Additional Evaluations and Studies.....</i>	<i>29</i>
<i>5.5 Community Advisory Panel.....</i>	<i>29</i>
<i>5.6 Community Interviews.....</i>	<i>30</i>
6.0 PLANNED PARTICIPATION ACTIVITIES.....	31
<i>6.1 Expanded Facility List.....</i>	<i>32</i>
<i>6.2 BFC Updates</i>	<i>32</i>

6.3 Community Advisory Panel.....	32
6.4 Community Interviews.....	33
6.5 Library Technical Document Repository	33
6.6 Media Relations	33
6.7 Neighborhood and Civic Group Meetings	33
6.8 NEPA Public Involvement and Transition Activities.....	34
6.9 Public Comment Periods	34
6.10 Public Information Meetings	34
6.11 Website Resources.....	35
6.12 Site Contacts.....	35
7.0 CONCLUSION.....	41

Appendices

- Appendix A: RCRA Permit Modification Press Release, September 2, 2011
- Appendix B: KCP Environmental Timeline
- Appendix C: GSA’s BFC Legacy Contamination Clarification
- Appendix D: EPA Citizen Guide to Institutional Controls
- Appendix E: 2010 DOE Inspector General Audit Report on Environment and Worker Safety Control Systems
- Appendix F: USACE Fact Sheet on Bannister Former Landfill
- Appendix G: RCRA Permit Modification Flowcharts
- Appendix H: NIOSH Health Hazard Evaluation, April 13, 2011
- Appendix I: 2012 Community Interviews Report
- Appendix J: 2006 KCP RCRA Community Involvement Plan
- Appendix K: BFC News, December 2012 issue
- Appendix L: Sample Public Meeting Notice

Figures

FIGURE 1: MAP OF RESPONSIBILITIES FROM BFC TRI-PARTY AGREEMENT	3
FIGURE 2: LAND OWNERSHIP AT THE BANNISTER FEDERAL COMPLEX	8
FIGURE 3: MAP OF THE BANNISTER FEDERAL COMPLEX IN THE KANSAS CITY AREA.....	10
FIGURE 4: ZONING MAP	11
FIGURE 5: PHOTOGRAPH OF FORMER RACETRACK	12
FIGURE 6: CONSTRUCTION OF THE MAIN MANUFACTURING BUILDING.....	13
FIGURE 7: GROUNDWATER CONTAMINATION AT THE BFC.....	16
FIGURE 8: SOIL CONTAMINATION AND SWMUS AT THE BFC	17
FIGURE 9: PICTURE OF FORMER LAGOONS	21

Acronym List

AEC	Atomic Energy Commission
BFC	Bannister Federal Complex
CAP	Community Advisory Panel
CEARP	Comprehensive Environmental Assessment and Response Program
CMI	Corrective Measures Implementation
CMS	Corrective Measures Study
DNR	Missouri Department of Natural Resources
DOD	Department of Defense
DOE	Department of Energy
EPA	Environmental Protection Agency
ERDA	Energy Research and Development Administration
GSA	General Services Administration
HWMF	Hazardous Waste Management Facility
IWPF	Industrial Wastewater Pretreatment Facility
KCP	Kansas City Plant
M&O	Management & Operating contractor
NEPA	National Environmental Policy Act
NIOSH	National Institute for Occupational Safety and Health
NNSA	National Nuclear Security Administration
PCB	Polychlorinated biphenyl
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
USACE	U.S. Army Corps of Engineers

Executive Summary

This Community Involvement Plan (CIP) provides a history and summary of environmental activities and related efforts to communicate with nearby residents and interested stakeholders for the Bannister Federal Complex (BFC), currently owned by the U.S. General Services Administration (GSA) and the U.S. Department of Energy (DOE) in Kansas City, Missouri. It also provides a plan for those public participation activities that will occur in the future as specific milestones are reached. These milestones may be related to environmental cleanup or evaluation of specific future land and/or building use scenarios for the BFC.

Specifically, this plan has been prepared for community involvement activities associated with a Missouri Hazardous Waste Management Facility Part I Permit and Environmental Protection Agency Hazardous and Solid Waste Amendments Part II Permit which, together in this document, will be called a hazardous waste permit. This plan also addresses community involvement activities and opportunities associated with environmental actions taken by the U.S. Army Corps of Engineers (USACE) at the Old Landfill in the southeast portion of the BFC property. USACE is not a permittee under the hazardous waste permit but the work performed by them is expected to be consistent with the provisions of the permit.

DOE, GSA, and USACE are committed to providing ample and diverse opportunities for nearby residents, interested citizens, employees and others to get information and voice their views about the environmental activities and potential redevelopment options that may be evaluated at the BFC. Recognizing that people prefer to receive information in different ways and have varying levels of interest in the BFC, this CIP describes what the DOE and GSA have done and will do to identify the community's issues, needs and concerns, and the specific activities to address those concerns.

One important objective of the CIP is to help facilitate an exchange of information with the community about the hazardous waste permit process and corrective action activities conducted at the BFC. The plan also describes a commitment to deliver timely information to all stakeholders on major milestones at the BFC on issues related to the hazardous waste permit, the environmental corrective action process and potential redevelopment.

Because this is a living document, this CIP will be reviewed every five years and updated, as necessary, to reflect community preferences as well as environmental milestones and activities at the BFC. During active environmental investigations and any remediation required as a result of these investigations, DOE, GSA and USACE plan to keep residents and interested stakeholders informed and involved with

activities such as public meetings, newsletters, community group presentations, and website updates.

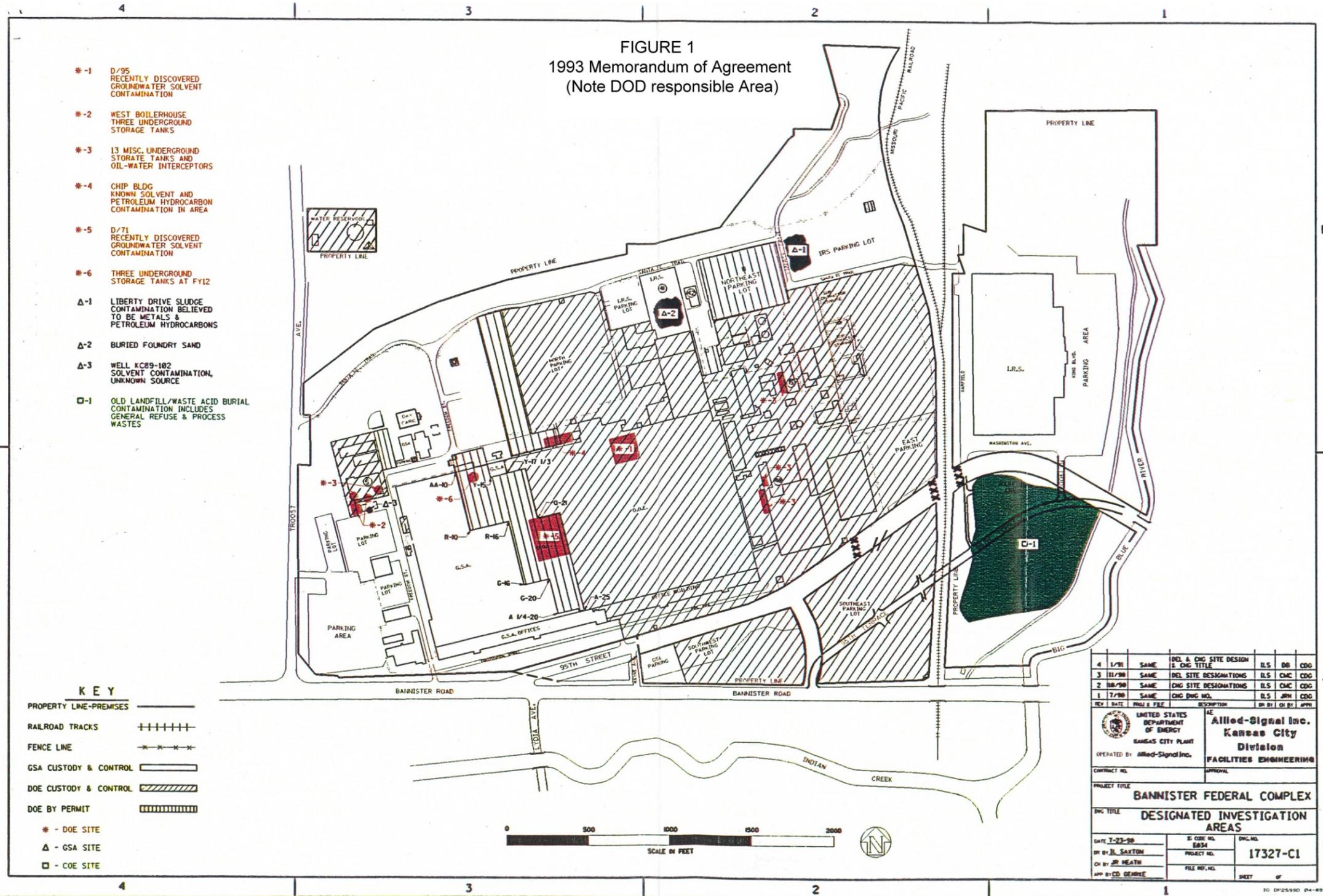
1.0 Introduction

For over 70 years, the BFC, at 95th St and Troost Avenue in south Kansas City, Missouri, has served the community as a major employer and served the nation in support of national security and national business administrative services. The buildings and the land on which they reside on the Complex are owned by the Federal government, specifically, DOE or the GSA. These two agencies are committed to protecting the health and safety of their employees, the surrounding community, and being good stewards of the environment. As separate federal entities, they have historically operated side-by-side within the BFC.

Both DOE and GSA have been performing environmental investigations and corrective action activities on their respective portions of the federal Complex under separate environmental programs for a number of years. During the early 1990s the DOE, GSA and the USACE completed an agreement whereby the BFC was divided into specific areas that each agency (DOE, GSA and USACE) was responsible for as it pertained to environmental cleanup. DOE would address areas owned by them, as well as additional areas owned by GSA which may have been impacted by DOE operations. The USACE agreed to address the area of a former landfill in the southeast portion of the Complex owned by GSA. All remaining areas of the BFC would be addressed by GSA. A map of this historical distribution of responsibility is provided as Figure 1.

DOE has been actively addressing environmental issues at the BFC since the early 1980s. The DOE portion of the Complex formerly utilized what were called wastewater treatment lagoons that managed liquid wastewaters from DOE operations that met the definition of hazardous waste under federal and state hazardous waste regulations. As such, the portion of the Complex addressed by DOE has and continues to be addressed under environmental cleanup authority mandated by these same hazardous waste regulations with the Missouri Department of Natural Resources (DNR) and U.S. Environmental Protection Agency (EPA) providing regulatory oversight. DOE has extensively characterized the site over the years and has spent over \$70 million to date on environmental cleanup activities.

Figure 1: Map of Responsibilities from BFC Tri-Party Agreement



Since 2010, GSA has been performing site investigations, removal assessments and response actions under the Comprehensive Environmental Response, Compensation and Liability Act, or CERCLA, with the EPA and DNR providing regulatory oversight. The CERCLA program was utilized in this instance as it is structured to allow EPA field response personnel and/or their contractors to conduct activities at other Federal agencies. Federal and state hazardous waste programs are not structured to provide such field support. These actions were prompted by employee and local media concerns regarding the health of GSA employees at the BFC. Investigation results to date from GSA areas have not shown risks to human health or the environment. It should be noted that GSA has not and does not conduct manufacturing operations but is limited to warehousing and office use.

As discussed above, a former landfill in the southeast portion of the BFC is being addressed by the USACE with EPA and DNR oversight. The landfill was established by the Department of Defense (DOD) in 1943 before the DOE or their predecessors came to the site. The landfill was used by the DOD tenant and the DOE predecessor from 1949 to 1964. In 1964, the DOD closed the landfill. Environmental assessment activities at the landfill are being performed under a program called the Formerly Used Defense Sites (FUDS) which, in Missouri, is overseen by DNR.

In 2011, DOE, in consultation with the GSA and USACE, submitted a hazardous waste permit modification request to DNR and EPA Region 7 to consolidate environmental efforts between the two BFC landowning agencies and address, in a comprehensive manner, the remaining environmental cleanup issues at the BFC. Specifically, the modification request added GSA as a Permittee under the existing DOE hazardous waste permit. In addition, the area addressed by the permit was expanded to include the entire BFC as opposed to just areas on the Complex addressed by DOE. The permit modification brings the entire BFC under one primary regulatory enforcement mechanism administered by DNR (with EPA oversight) and promotes a consistent, comprehensive approach to further site investigation, risk assessment and remediation. A press release ([Appendix A](#)) was issued on September 2, 2011, to announce the permit modification request.

DNR and EPA approved the proposed permit modifications on August 24, 2012. The modified permit requires a review of previous BFC environmental investigations, the performance of a "risk screening" based on current and potential property uses, and submission of this CIP as a part of initial activities. The CIP is written to help ensure that residents are informed and engaged in activities at the BFC.

The BFC will undergo significant changes in the next few years as both DOE and GSA relocate to new facility spaces sometime in 2014 and beyond. DOE and GSA

are committed to ensuring positive transformation of the BFC to maintain the viability of the Bannister corridor.

Work conducted under the hazardous waste permit will be an integral part of BFC transformation activities. In addition, other actions required by the National Environmental Policy Act (NEPA) have been completed (see also Section 6.8). NEPA requires that federal agencies consider the environmental consequences of their proposed actions before decisions on these actions are finalized. The DOE is moving the Kansas City Plant to a new location 8 miles south of the BFC. In accordance with NEPA, the DOE was required to evaluate the potential environmental impacts of their proposal to transfer their excess BFC property to a new owner(s). There are differing levels of analysis that a federal agency may undertake to comply with NEPA. In this case, an Environmental Assessment was prepared, and the public was asked to provide their comments on the draft document at a public hearing. In May 2013, the NNSA issued a finding that the transfer of the Kansas City Plant at the Bannister Federal Complex to a new owner would have no significant impact on the environment. The Finding of No Significant Impact (FONSI) is based on the results of a Final Environmental Assessment published with the FONSI that determined that the proposed action is not a major federal action that would significantly affect the quality of the human environment within the NEPA meaning. Therefore the preparation of an Environmental Impact Statement was not necessary. To review the EA document electronically, go to the following website address: <http://nnsa.energy.gov/nepa/bfcea>. A copy of the document is also available at the Mid-Continent Public Library, 9253 Blue Ridge Blvd., Kansas City, MO 64138. Separate NEPA environmental analysis will also be required before GSA decides to transfer their property at the BFC.

This CIP has been developed using the EPA's RCRA Public Participation Manual (<http://www.epa.gov/osw/hazard/tsd/permit/pubpart/manual.htm>). It includes guidance on how to facilitate an exchange of information with the community about the environmental permit process and potential future environmental corrective action activities conducted at the BFC. Activities outlined in this plan are intended to ensure that residents are informed and provided opportunities to comment on environmental activities and milestones regarding the BFC. Guidance from EPA and MDNR community involvement experts was also used in the development of this plan. The plan's purpose is to help facilitate an exchange of information with the community about the hazardous waste permit process and environmental corrective action activities conducted at the BFC. During active investigations and any cleanup required, DOE, GSA and USACE will keep residents and interested stakeholders informed and involved using the activities listed in the CIP. As stated in the Executive Summary, this CIP will be updated every five years or when a major/milestone trigger event is reached to reflect current community preferences as well as updating environmental activities at the BFC.

This CIP is divided into a number of topical sections.

- **Facility History:** Section 2 of the CIP provides a brief description and history of the BFC.
- **Summary of Environmental Investigations:** Section 3 discusses the history of environmental investigations on the BFC, the regulatory process for conducting these activities and the status of the cleanup activities.
- **Community Involvement, History and Current Concerns:** Section 4 of the CIP describes the goal of performing the activities in the plan. Section 5 describes community involvement activities that have occurred in the past at the BFC and the continuing concerns the public has based on recent interviews.
- **Planned Activities:** Section 6 describes the specific actions to be implemented to address the concerns the public has regarding the BFC and the timing and frequency of these activities. It also provides a list of site contacts including elected officials.
- **Appendices:** A number of appendices are provided in the plan providing the reader with additional detail on topics discussed in the plan.

2.0 Facility History

2.1 Site Location and Description

The BFC is located on 300 acres within the city limits of Kansas City, Missouri, about 12 miles south of the downtown area. The BFC is owned by two distinct federal agencies: the DOE, which owns approximately 122 acres of the Complex but currently occupies 136 acres (through lease with GSA), and the GSA who owns the remaining portion of the property. A map showing property ownership is provided as Figure 2.

The DOE property, known as the Kansas City Plant (KCP), is comprised of office/warehouse space and manufacturing operations and a boiler house for the generation of steam and chilled water (Figure 2). GSA owns and manages all the remaining space and land holdings at the BFC, which is comprised of office and warehouse space. Other federal agencies who lease areas on the BFC from GSA currently include the following:

- GSA's Regional Office
- U.S. Marine Corps

- Department of Agriculture
- Department of Commerce
- Veterans Affairs
- Federal Emergency Management Agency
- Federal Protective Service
- Department of Defense Inspector General

In addition, there is an on-premise childcare center for the children of BFC workers.

Low hills nearly encircle the plant, which is situated in a small river valley about 800 feet above sea level. The Complex is bordered on the west by Troost Avenue, a major north-south traffic artery. A heavily wooded bluff and the Legacy Park wildlife refuge border the north side of the Complex. The Blue River flows northward along the east border, and the south side is bordered by Bannister Road and the eastward flowing Indian Creek (Figure 3).

Zoning for the BFC has been updated from industrial to manufacturing with the surrounding area characterized by single and multiple family dwellings, commercial establishments, industrial districts, and public use lands. The property adjoining the BFC is zoned for residential use with isolated commercial tracts, except for areas along the east and north sides that have been designated for public recreational and agricultural uses (Figure 4). Kansas City's manufacturing-zoned districts like the BFC are primarily intended to accommodate manufacturing, warehousing, wholesale, and industrial uses. Permitted uses include schools, restaurants, sales, residential storage, and home/community gardens. For more information about zoning please see <http://www.zoningplus.com/regs/kansascity>.

The BFC property is situated within Missouri's 5th Congressional District, 9th Senatorial District, 44th U.S. House of Representatives District and 5th Kansas City Council District. A listing of elected officials is provided in Section 6.12.

2.2 BFC History

The site occupied by the current BFC was originally a boggy river bottom amidst a suburban countryside. Its only commercial usage was as an automobile race track. Built in 1922, the 1.25 mile wood oval track had high banked turns, two grandstands and parking for 20,000 automobiles including 5,000 in the infield (Figure 5). The last race at the track was held in July of 1924. The speedway was sold in March of 1925. It was reported that repeated flooding from the nearby Blue River caused the wooden track to warp excessively prohibiting its use as a race track.

In April 1942, the Navy requested the United Aircraft Corporation, the parent company of Pratt-Whitney, to procure a site for a new factory that could build aircraft engines for

the nation's war effort. They chose Kansas City, specifically the location of what is now the BFC. The land for the new plant was quickly acquired from 30 landowners and groundbreaking for construction of the plant occurred on July 4, 1942. Building construction of the facility actually began in August 1942 and in May 1943 production began on the first Pratt-Whitney aircraft engine. The building currently known as the Main Manufacturing Building (Figure 6) was declared complete in October 1943. At the time it was the second largest aircraft engine plant in the world.

The plant operated at full production until the end of World War II when engine production ceased. The building was declared excess on September 24, 1945. After the war, the facility was turned over to the War Assets Administration, and until 1948 was used both as a warehouse and to house several private and government operations. In 1948, the War Assets Administration transferred the entire facility to the Department of the Navy. Shortly thereafter, the Navy leased part of the building to the Westinghouse Electric Company for production of jet engines.

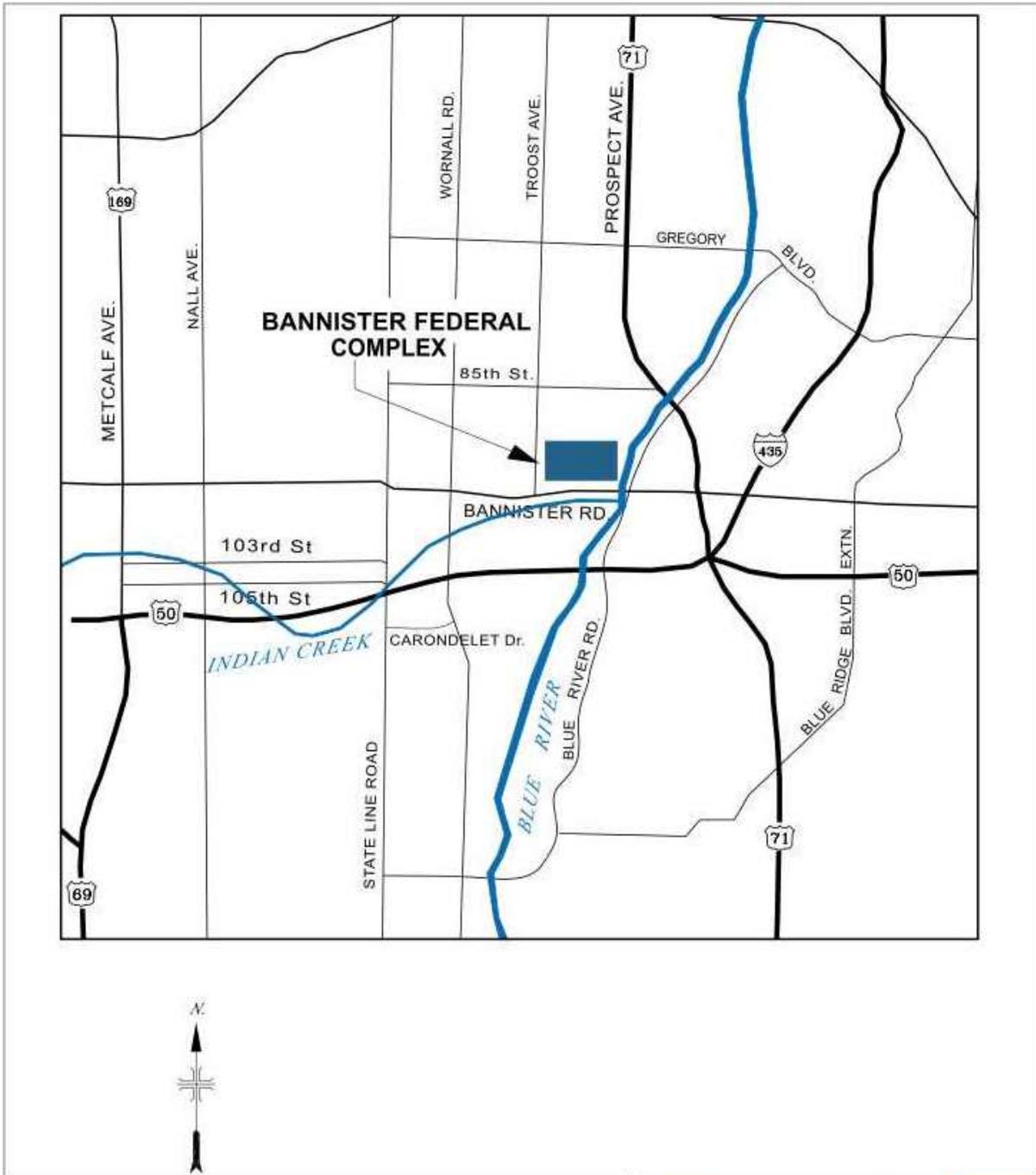
On November 29, 1948, the Atomic Energy Commission (AEC) formally announced its selection of the Kansas City Plant as the site for a new facility to manufacture non-nuclear components of nuclear weapons, to be operated under a prime contract for the AEC by the Bendix Corporation. Bendix subleased a large portion of the facility from Westinghouse Corporation, and operations at the plant began on April 21, 1949. By the end of 1949, employment had reached 1,240 persons. AEC operations began expanding into a greater portion of the main manufacturing building, into outlying buildings, and into new buildings which had to be constructed. By 1964, more than 8,000 people were employed at the plant.

On April 30, 1961, the Westinghouse lease on the BFC was cancelled and that portion of the facility occupied by Westinghouse was transferred to GSA. On July 1, 1962, the entire Complex, exclusive of a 24-acre tract, was transferred to GSA with the agreement that the AEC would continue to use portions of the tract for its operation. In February 1975, the plant came under control of the Energy Research and Development Administration (ERDA), a predecessor agency to the DOE, as a result of government reorganization.

Figure 2: Land Ownership at the Bannister Federal Complex



Figure 3: Map of the Bannister Federal Complex in the Kansas City Area



 U.S. DEPARTMENT OF ENERGY		
BANNISTER FEDERAL COMPLEX		
Project:	Bannister Federal Complex	
Title:	Community Involvement Plan	
Drawing Title:	Figure 3: Location of the Bannister Federal Complex in the Kansas City Area	
Date:	01/16/2013	

Figure 4: Zoning Map

Bannister Federal Complex (BFC)

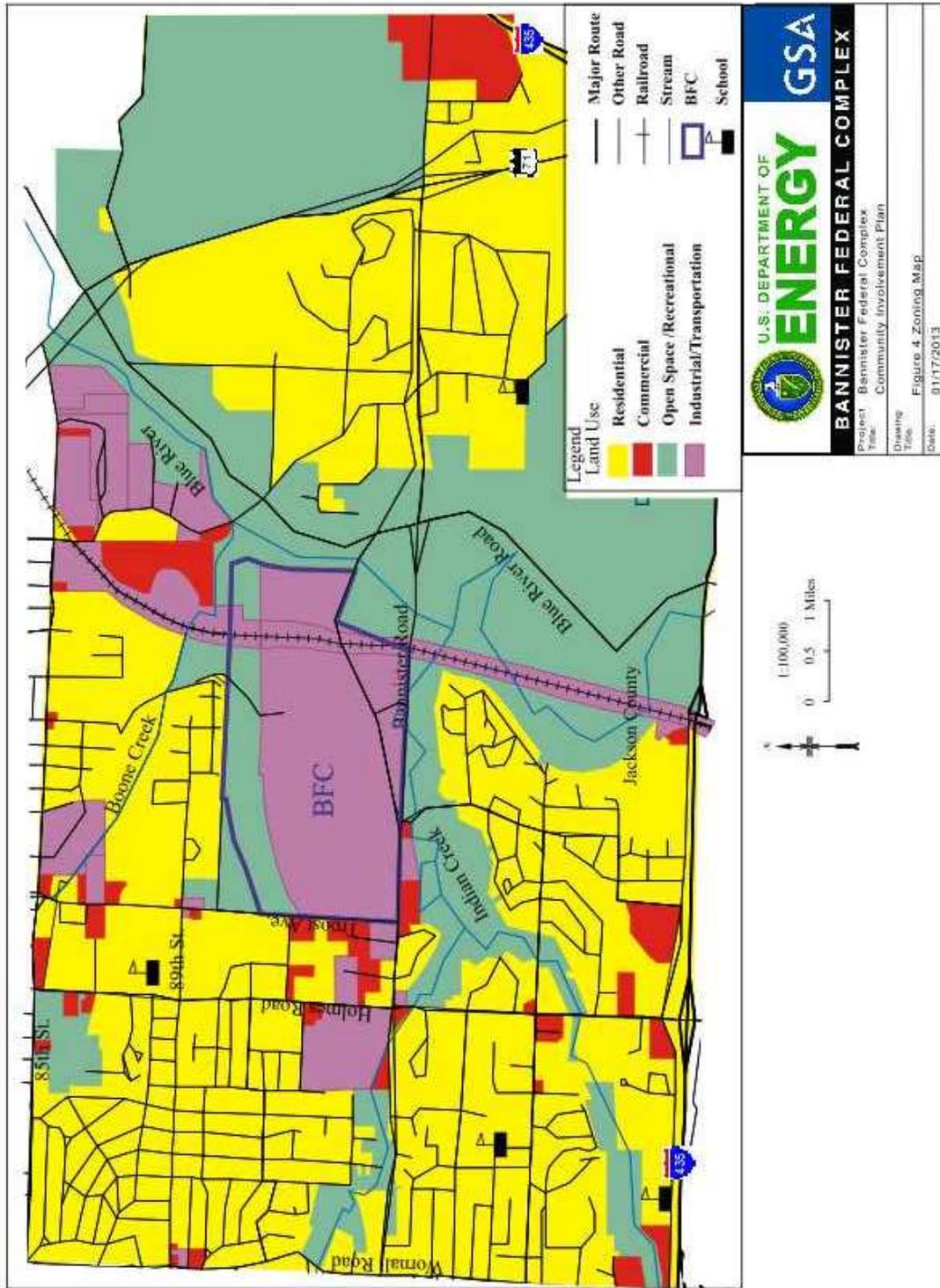
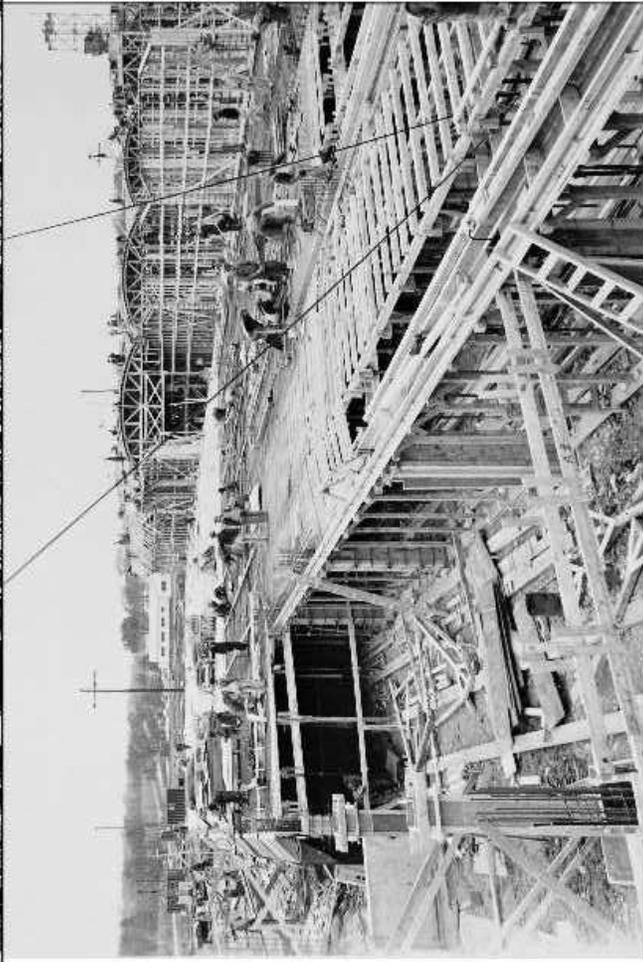
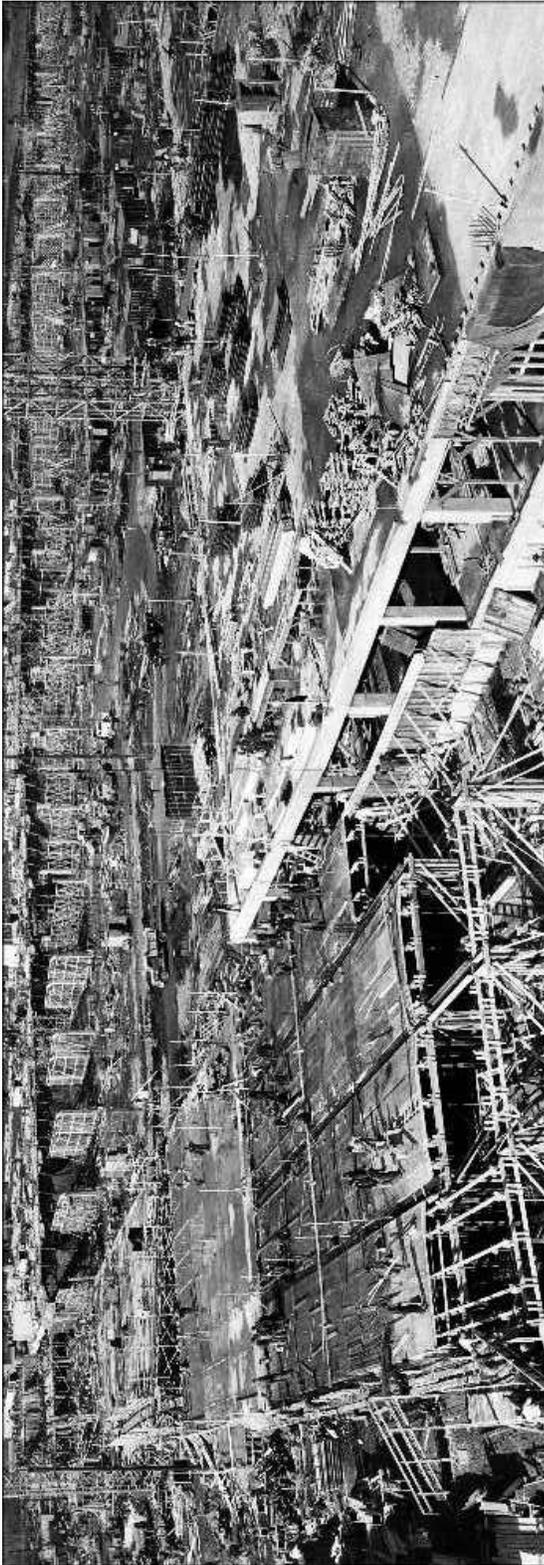


Figure 5: Photograph of Former Racetrack



		U.S. DEPARTMENT OF
ENERGY		GSA
BANNISTER FEDERAL COMPLEX		
Project	Bannister Federal Complex	
Title	Community Involvement Plan	
Drawing	Figure 5: Wooden Race Track	
Date	01/16/2013	

Figure 6: Construction of the Main Manufacturing Building



	U.S. DEPARTMENT OF ENERGY	GSA
BANNISTER FEDERAL COMPLEX		
Project: Bannister Federal Complex		
Risk: Community Involvement Plan		
Drawing Title: Figure 6: Bannister Federal Complex Construction		
Date: 01/17/2013		

On October 1, 1976, the entire ERDA-occupied portion of the BFC was transferred to the custody and control of ERDA through a Memorandum of Understanding with the GSA. The Department of Energy (DOE) was created on October 1, 1977, and the KCP, as part of the ERDA Complex, was included in the new Department. In 2000, the DOE created the National Nuclear Security Administration (NNSA), in part, to strengthen national security and reduce the global threat from weapons of mass destruction through applications of science and technology. With the end of the Cold War in the early 1990s, the emphasis of the U.S. nuclear weapons program shifted from developing and producing new weapons to dismantlement and maintenance of a smaller, enduring stockpile with an emphasis on safety, security and reliability. DOE's NNSA Kansas City Field Office currently oversees operations of the KCP by Honeywell Federal Manufacturing & Technologies (FM&T).

Today, FM&T employs about 2,600 employees. The KCP manufactures a wide array of intricate components, including electrical and mechanical devices that enhance the safety and security of the nation's defense systems.

GSA employs about 1,000 employees at the Heartland Regional Office located at the BFC. This Regional Office is responsible for the management of federal buildings and commercial leases, as well as federal purchasing and contracting in Missouri, Kansas, Iowa and Nebraska. GSA provides work spaces for 60,000 federal employees, managing more than 21.6 million square feet throughout the four-state area. In addition, GSA is responsible for acquiring equipment, supplies, telecommunications and information technology for other federal agencies.

3.0 Summary of Environmental Investigations

3.1 DOE Kansas City Plant

As with any large manufacturing facility, many of the materials used at the KCP could pose a risk to the environment and public health if not safely managed in compliance with federal, state and local requirements. As discussed earlier, the KCP originally manufactured radial engines in World War II, then jet engines in the 1950's with DOE manufacturing operations starting in the late 1940's and becoming the principle activity at the BFC in the 1960's to present day. The types of industrial chemicals historically utilized at the KCP are the same as those used in any manufacturing facility that performs industrial processes such as machining, electroplating, painting, and metal cleaning operations. Common chemicals used include metal cleaning solvents, oils and, in the case of engine manufacture, fuels. The KCP also utilized oils containing polychlorinated biphenyls (PCBs) to cool molds used in the manufacture of plastic parts. The PCBs were added to the oil as a fire protection measure because of the ability of PCBs to serve as a fire retardant. Historical management practices along with spills and leaks of these solvents and oils have

contaminated soil and groundwater at the facility. Most of the releases that occurred at the plant occurred before most federal regulations were in place and prior to industry having an understanding and appreciation of adverse environmental impacts created by certain materials and operations.

The primary contaminants in soil at the site are the same chlorinated (metal cleaning) solvents, petroleum hydrocarbons (fuels) and PCB containing oils noted above. A primary contaminant at the KCP and the BFC is the solvent trichloroethylene (TCE). Over time TCE changes or degrades into other organic compounds, specifically 1, 2-dichloroethylene (1, 2-DCE) and then to vinyl chloride in the subsurface environment at the KCP. Together these three compounds comprise the vast majority of contamination in groundwater and soil at the site. PCBs are present in certain areas of soil at the facility. Due to their chemical properties, PCBs do not readily dissolve in water and do not present a groundwater problem. However, unlike solvents that volatilize and degrade over time, PCBs persist in the environment for a long time. A map of groundwater contamination at the facility is included as Figure 7. Specific areas called Solid Waste Management Units (SWMUs) that have been investigated by DOE at the BFC under hazardous waste regulations and the hazardous waste permit, as well as locations of known soil contamination identified from these investigations, are provided in Figure 8.

The compounds in Tables 1 and 2 below list the environmental contaminants that have been historically detected in the groundwater and soil at the site and are sampled in accordance with the hazardous waste permit. The tables also provide the current cleanup standards that must be met before groundwater can be considered clean.

An initial comprehensive environmental assessment was conducted by KCP personnel and published in 1977. A KCP Environmental Timeline provided as [Appendix B](#) and a GSA BFC Legacy Contamination Clarification document provided as [\(Appendix C\)](#) summarize environmental work performed from the pre-regulatory era through current day. Throughout its history, the KCP has operated in a manner designed to meet or exceed all environmental, health, and safety standards and regulations in place at the time.

The Resource Conservation and Recovery Act (RCRA) has been the regulatory driver for the environmental cleanup performed at the Kansas City Plant. Since 1980 EPA has developed a comprehensive program to ensure that hazardous waste is managed safely: from the moment it is generated; while it is transported, treated, or stored; until the moment it is finally disposed (from cradle to grave). The intent of the program is for states to establish their own hazardous waste program patterned off of

Figure 7: Groundwater Contamination at the BFC

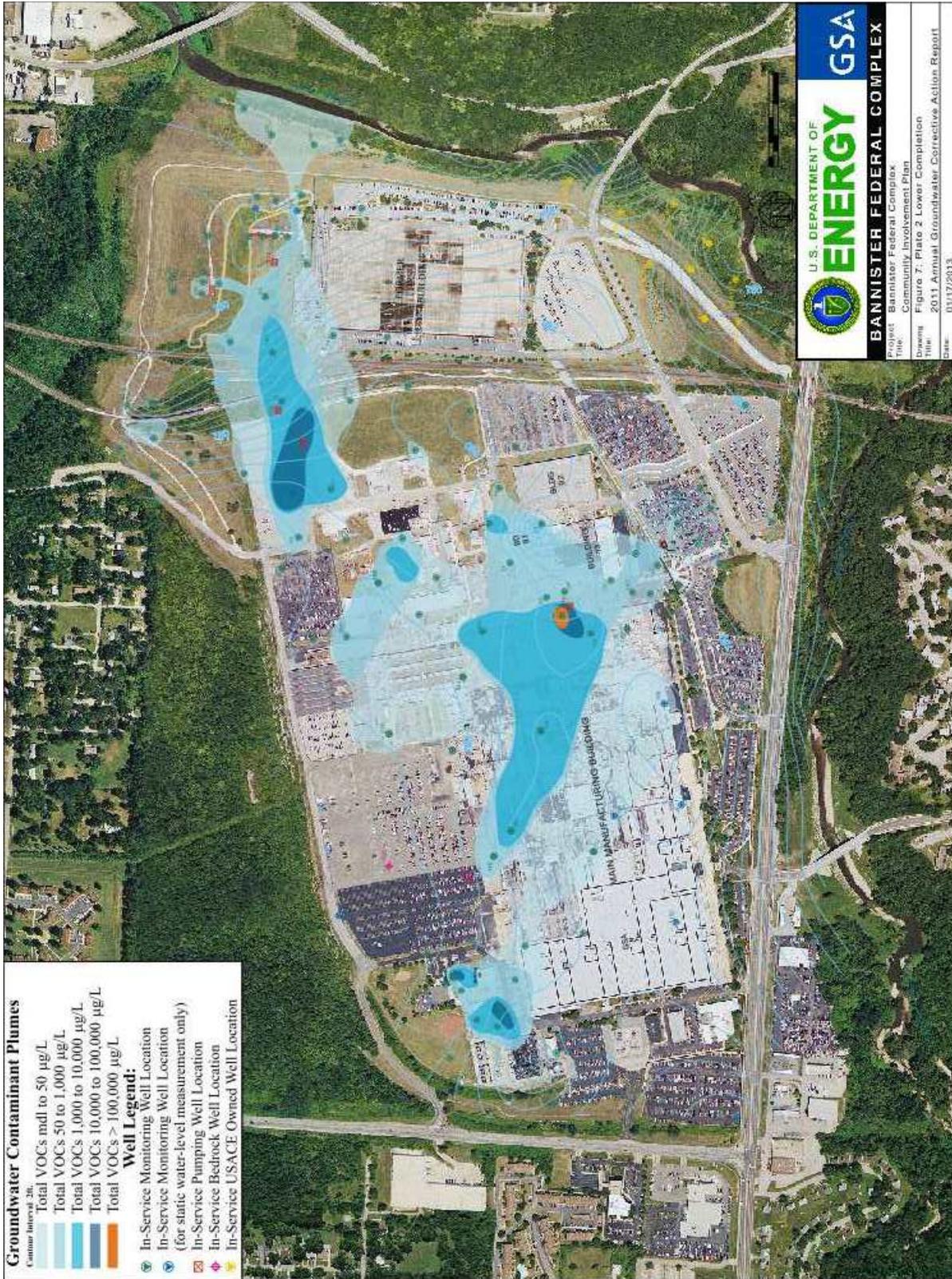
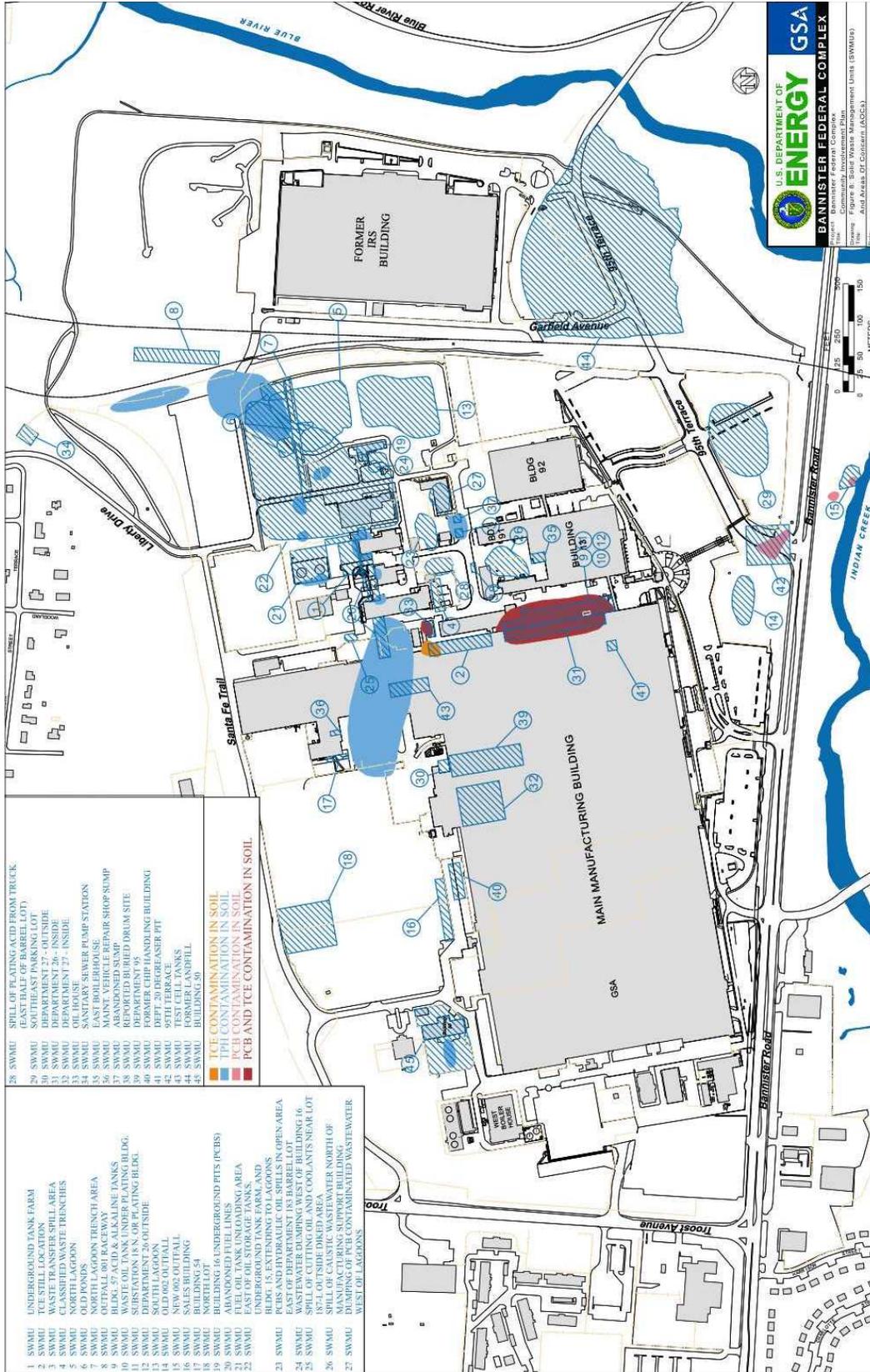


Figure 8: Soil Contamination and SWMUs at the BFC



the Federal RCRA program. Missouri received authorization to administer its own hazardous waste program in 1985. In 1999, additional expanded authority was granted by EPA for Missouri to administer its own cleanup program under its hazardous waste program formally known as the Missouri Hazardous Waste Management Law. Environmental cleanup activities under hazardous waste programs whether they be Federal or State administered are called Corrective Action Programs (Cleanup = Corrective Action).

An application to store hazardous waste in containers and tanks and to treat hazardous waste in surface impoundments (lagoons) was submitted to EPA in November 1980. The KCP historically managed two surface impoundments called the North and South Lagoons, the locations of which are shown in Figure 9.

Beginning in 1962, before hazardous waste regulations existed, the North Lagoon received industrial wastewaters from plant manufacturing processes. The companion South Lagoon was constructed in 1975. Both continued to operate into the 1980s. However, with the promulgation of new hazardous waste rules in 1984, the two surface impoundments (lagoons) were required to have double liners installed underneath them to prevent the infiltration of wastewater into subsurface soils. If the liners were not installed, the lagoons would have to be closed. Contaminated sediment and soil from the North Lagoon were removed in December of 1985. Final closure of both lagoons, conducted under the hazardous waste program, was completed in 1988.

On June 23, 1989, EPA and DOE entered into Consent Order VII-89-H-0026 pursuant to the authority of Section 3008(h) of RCRA (the Act that regulates hazardous waste). The Consent Order directed the investigation and corrective action activities at DOE BFC-managed areas identified under the three party agreement (see Section 1 and Figure 1).

During the term of the Consent Order (between 1989 and 1999) DOE addressed 42 of 43 Solid Waste Management Units identified in the Consent Order as possible release sites (SWMUs) following the corrective action (cleanup) process.

**Table IA– Groundwater Protection Standard
for the Blue River Groundwater Flow System**

Hazardous Constituent	Maximum Concentration Limit (ug/l)	Maximum Detection Limit (ug/l)*
Acetone	5500 (c)	10.0
Benzene	5 (a), (b)	2.0
2-butanone (MEK)	7000 (c)	5.0
Carbon disulfide	1000 (c)	5.0
Chlorobenzene	100 (a), (b)	0.7
Chloroethene	2 (a), (b)	1.8
Chloroform	5.7 (b)	0.5
1,2-dichlorobenzene	600 (a)	1.0
1,1-dichloroethane	810 (c)	0.7
1,2-dichloroethane	5 (a), (b)	0.5
1,1-dichloroethene	7 (a), (b)	1.3
1,2-dichloroethene	70 (a)	0.5
4-Methyl-2-pentanone (MIBK)	2000 (c)	5.0
Tetrachloroethene	0.8 (b)	0.5
Toluene	1000 (a), (b)	2.0
1,1,1-trichloroethane	200 (a), (b)	0.5
1,1,2-trichloroethane	5 (a), (b)	0.5
Trichloroethene	5 (a), (b)	1.2

*The lower of practical quantitation limits (PQLs) contained in the latest version of the EPA publication entitled: Test Methods for Evaluating Solid Waste – Physical/Chemical Methods (SW-846) or method specific detection limits routinely achieved by Permittee’s laboratory.

- (a) Denotes limits derived from state (10 CSR 60 Chapter 4, dated October 31, 2003) and federal public drinking water regulations.
- (b) Denotes limits derived from Missouri Water Quality Standards (10 CSR 20-7.031, dated November 30, 2005) for protection of groundwater.
- (c) Denotes limits derived from Preliminary Remediation Goals (PRGs) for tap water as contained on the EPA Region IX PRG Table dated October 2004.

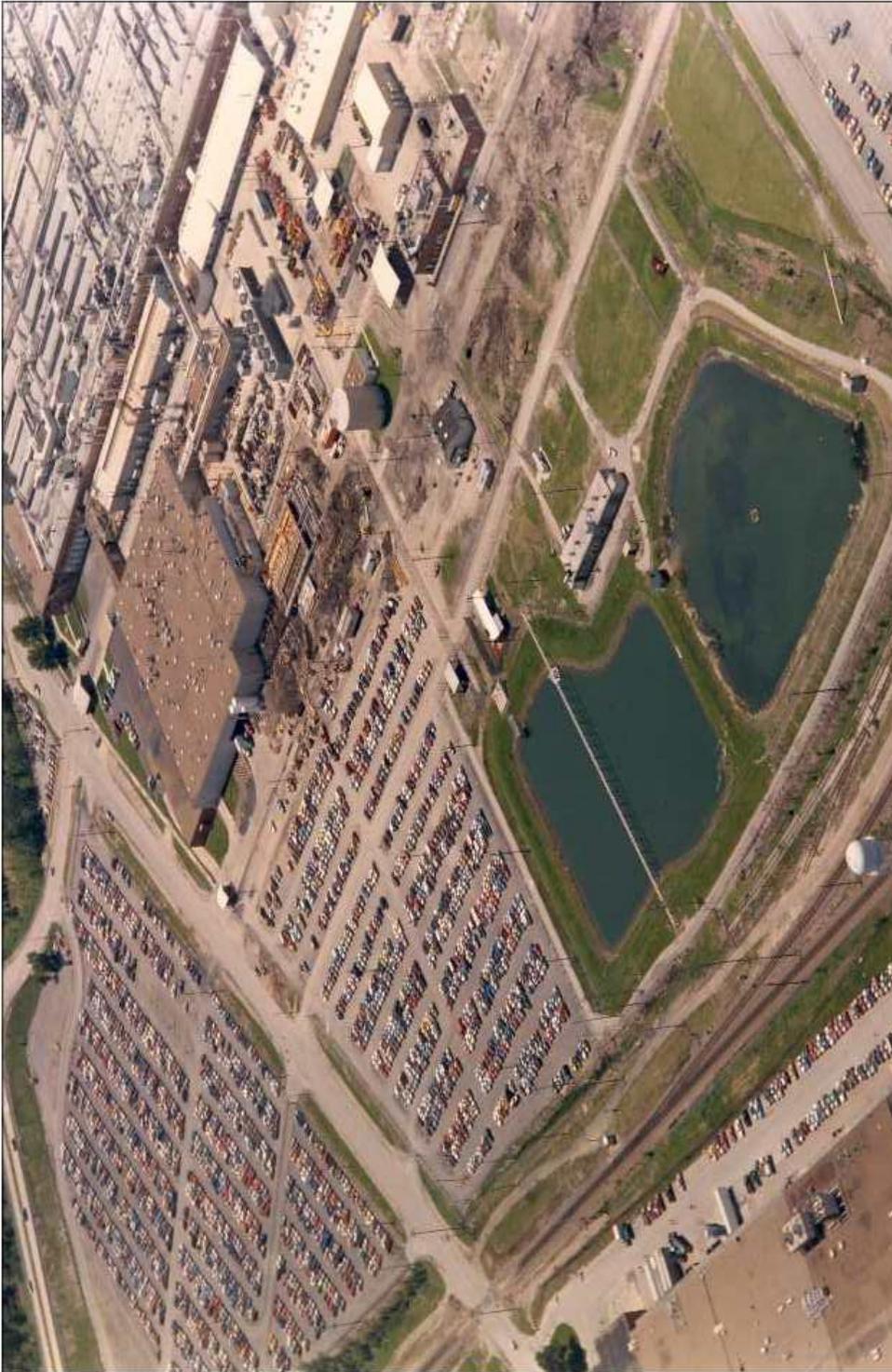
**Table IB – Groundwater Protection Standard for the
Indian Creek Groundwater Flow System**

Hazardous Constituent	Maximum Concentration Limit (ug/l)	Maximum Detection Limit (ug/l)*
Benzene	5 (a), (b)	2.0
Chlorobenzene	100 (a), (b)	0.7
Chloroethene	2 (a), (b)	1.8
1,2-dichlorobenzene	600 (a)	1.0
1,1-dichloroethane	810 (c)	0.7
1,2-dichloroethane	5 (a), (b)	0.5
1,1-dichloroethene	7 (a), (b)	1.3
1,2-dichloroethene (total)	70 (a)	0.5
Ethylbenzene	700 (a), (b)	2.0
4-Methyl-2-pentanone (MIBK)	2000 (c)	5.0
Polychlorinated biphenyls	0.5 (a), (d), (e)	0.5
1,1,1-trichloroethane	200 (a), (b)	0.5
1,1,2-trichloro-1,2,2-trifluoroethane	59,000 (c)	5.0
Tetrachloroethene	0.8 (b)	0.5
Toluene	1000 (a), (b)	2.0
Trichloroethene	5 (a), (b)	1.2
Trichlorofluoromethane (Freon 11)	1300 (c)	0.8
Xylenes (total)	10,000 (a), (b)	7.0

*The lower of practical quantitation limits (PQLs) contained in the latest version of the EPA publication entitled: Test Methods for Evaluating Solid Waste – Physical/Chemical Methods (SW-846) or method specific detection limits routinely achieved by Permittee’s laboratory.

- (a) Denotes limits derived from state (10 CSR 60 Chapter 4, dated October 31, 2003) and federal public drinking water regulations.
- (b) Denotes limits derived from Missouri Water Quality Standards (10 CSR 20-7.031, dated November 30, 2005) for protection of groundwater.
- (c) Denotes limits derived from Preliminary Remediation Goals (PRGs) for tap water as contained on the EPA Region IX PRG Table dated October 2004.

Figure 9: Picture of Former Lagoons



 U.S. DEPARTMENT OF ENERGY	GSA
BANNISTER FEDERAL COMPLEX	
Project: Bannister Federal Complex	
Title: Community Involvement Plan	
Drawing:	
Rev:	
Figure 9 - Picture of Former Lagoons	
Date:	01/17/2013

The corrective action process for cleanup under the Missouri hazardous waste program is conducted in several phases. The first phase, the RCRA Facility Investigation (RFI), includes detailed soil and groundwater sampling and analysis to determine the nature and extent of contamination. The next phase, Corrective Measure Study (CMS), evaluates remediation alternatives to determine the best way to address releases to the environment identified in the RFI. When the Corrective Measure Study is complete, the DNR and EPA review the possible remedial (cleanup) measures and select the best remedy given site-specific consideration for each solid waste management unit and/or area of concern. The public is then invited to review and comment on the proposed final remedy before the DNR and EPA make a final decision. The Corrective Measure Implementation (CMI) phase occurs when the facility implements the MDNR and EPA approved final remedy.

In 1999, DNR and EPA issued hazardous waste permits to DOE for the KCP. With this action, the 1989 Consent Order was terminated. Issuance of the permits transferred the primary oversight responsibility and authority for the investigation and corrective action activities from EPA to DNR as DNR had received interim authorization from EPA to administer their own corrective action program. Environmental monitoring and cleanup following the corrective action process, described in the paragraph above, continued under the hazardous waste permit (MO9890010524). In late 2006, the KCP addressed the last of the original 43 Solid Waste Management Units required under corrective action.

The KCP is restricted to industrial use only and groundwater at the BFC cannot be used for any purpose. Groundwater is currently collected, treated and discharged to the local sewage treatment plant. DOE is also required to sample surface water, sediment and fish tissue in Indian Creek and the Blue River as a part of the hazardous waste permit.

The site is primarily engaged in the management and implementation of ongoing programs to manage risks created by the hazardous waste constituents that remain. Activities include sampling and analysis of environmental media (e.g., groundwater), inspection, maintenance and repair activities, implementation of institutional and engineering controls and reporting.

For more information about use of institutional and engineering controls, see the EPA Citizen Guide to Institutional Controls. This guide ([Appendix D](#)) explains how the presence of some residual contamination does not mean that a site cannot be used safely.

In 2010, the DOE Inspector General conducted a six-month audit ([Appendix E](#)) of KCP's environmental and safety controls and found that the KCP had established and implemented controls to protect the environment and workers.

3.1.1 Soil and Groundwater Quality

As discussed previously, past disposal practices and spills of materials such as solvents, and polychlorinated biphenyl (PCB) containing oils have resulted in areas of soil and/or groundwater contamination. The origin of contamination in some areas dates back to World War II when the BFC was used to make aircraft engines. Other releases occurred from the 1950s through the early 1970s from operations conducted by Westinghouse as well as DOE. Groundwater passing through this and other areas of contaminated soil dissolve contaminants that reside in the soil and create what are called groundwater contaminant "plumes."

As part of the historical KCP corrective action activities, many groundwater monitoring wells have been drilled around the facility to determine exactly where groundwater contamination occurs, the degree of contamination, and how fast it is moving. As late as the 1980s, before corrective action began at the site, a plume of solvent contamination reached the Blue River. However, this plume has been contained since the late 1980s by a series of groundwater pumping wells situated throughout the BFC. These pumping wells serve to contain groundwater and keep it from flowing off-site to the Blue River and Indian Creek. Water collected from the pumping wells is pumped back to an on-site treatment system. Here, the contaminants are destroyed and the treated water sent to the city's sanitary sewer system.

As mentioned above, polychlorinated biphenyls have contaminated subsurface soils at the KCP. Historical releases of PCBs to Indian Creek in the 1960s and 1970 have resulted in the sporadic detection of PCBs in storm water discharges and in sediments along Indian Creek (see also Section 3.1.2). Ongoing work on the historical release of PCBs at the BFC and its potential effect on human health and the environment is being addressed under the hazardous waste permit.

The BFC is located on the flood plain of the Blue River. A comprehensive flood protection system was constructed in the 1990s. It was designed to provide a risk reduction for a 500-year flood event.

3.1.2 Water Quality

The KCP operates under discharge Permits required by the federal Clean Water Act, the State of Missouri, and the City of Kansas City, Missouri.

Under a State of Missouri Operating Permit (Number MO004863) issued by the DNR, the KCP discharges surface rainwater into four regulated storm sewers. Three of the four storm sewers empty into Indian Creek and the fourth empties into Boone Creek, which is a small creek that runs into the Blue River. PCBs have been detected sporadically in stormwater at the BFC. The potential movement of PCBs from the facility to storm water to surface water surrounding the facility (Blue River and Indian Creek) is being evaluated under the hazardous waste permit.

The KCP industrial sewer system routes industrial wastewater through an Industrial Wastewater Pretreatment Facility (IWPF) before discharging it by Permit to the sanitary sewer system and subsequently to the City's publicly-owned treatment works. This was the waste stream that went to the lagoons in the 1960s – 1985. Internal administrative procedures ensure only the introduction of wastewaters compatible with its industrial wastewater treatment system. The pretreatment facility ensures compliance with the federal, state and city-imposed discharge limits.

3.2 General Services Administration

GSA has operated a safety and environmental program since 1989. Property structures under GSA control have undergone safety inspections each year. Some tests were conducted in response to specific concerns, while other tests set a baseline to characterize conditions.

GSA, relying on the best available science, remains confident that GSA-controlled spaces have not posed a human health risk.

In response to employee and media concerns, GSA performed additional vapor intrusion testing for volatile compounds and polychlorinated biphenyls throughout several buildings beginning in January 2010. GSA sought to determine potential impacts to GSA workers from subsurface and airborne contamination potentially derived from DOE portions of the BFC. In addition, GSA performed air and dust sampling for beryllium and uranium. Tests have been performed on every water outlet for potential contaminants. GSA performed this testing pursuant to an EPA/GSA Environmental Work Agreement for Site Investigations, Removal Assessment, and Response Actions under the Comprehensive Environmental

Response, Compensation and Liability Act (CERCLA) Sections 101, 104, 107, 120 and 122, which was filed with the EPA Region 7 Hearing Clerk on May 3, 2010 (Docket No. CERCLA-07-2020-0006 ("Work Agreement")). CERCLA provides for broad federal authority to respond directly to releases or threatened releases of hazardous substances, which may endanger public health or the environment. The Work Agreement sought to proactively address how both known and potentially unknown contamination at the BFC affects the human environment within GSA-controlled space. The public can view testing results at: <http://r6.gsa.gov/bannister/>

In 2010, as a follow-up step regarding GSA employee concerns at the BFC, the GSA released the Office of Inspector General report on safety and health conditions at GSA-owned property within the BFC. Although the IG investigation did not find any indication of health risks at GSA, the report did suggest improvements to GSA's responsiveness to its workers and regulators. The report can be viewed at http://r6.gsa.gov/bannister/reports/GSA_IG_Report_11_8_2010.pdf

Additionally, in 2011, the Center for Disease Control's National Institute for Occupational Safety & Health (NIOSH) published an interim report on their ongoing Health Hazard Evaluation of the BFC (Appendix H). The GSA requested that NIOSH perform the evaluation after former workers raised concerns that illnesses might be linked to DOE KCP operations. The report concludes: "Based upon the information we have obtained to this point, we believe that Bannister Federal Complex employees have no significant exposure from substances in use now or in the past at the Kansas City Plant. Our careful and thorough review of documents, monitoring and exposure records, our assessment of the work areas, and our interviews with multiple employees, managers and supervisors all found minimal potential for exposure."

3.3 U.S. Army Corps of Engineers

The Department of Defense is responsible for environmental restoration (cleanup) of properties that were transferred from Department of Defense jurisdiction before October 17, 1986, in accordance with Engineer Regulation 200-3-1. Such properties are known as Formerly Used Defense Sites (FUDS). The USACE manages and directs the programs administration. Environmental cleanup at these properties is conducted in accordance with CERCLA. The USACE, Kansas City District, is responsible for conducting environmental activities at a former landfill area located at the BFC (Fig. 8). The overall goal for the program is to protect human health and the environment from potential contamination associated with the landfill. Activities performed to-date at the landfill include:

- (RCRA) Remedial Investigation by DOE in conjunction with the construction of 95th Terrace (DOE, 1988)
- (CERCLA) Supplemental Investigation (USACE, 1994)
- (CERCLA) Remedial Investigation (USACE, 1997)
- (CERCLA) Groundwater Monitoring, numerous reports from 2001 – 2011
- (CERCLA) “Additional Investigation” (USACE 2007)
- (CERCLA) Remedial Investigation (2011 – present, in progress)

From 1943-1964, the landfill operated and accepted waste from different manufacturing facilities at the BFC. Contents identified in boring logs have included: “glass, brick, coffee cups, copper wire, metal shavings, rubber, wood, concrete, nails, slag, cloth rags, and asphalt fragments.” Information gathered from soil boring (drilling) logs also identified the presence of organic compounds emanating from some of the soil borings with descriptions of the presence of a fuel odor present (USACE, 1994).

Groundwater wells within the landfill indicate the presence of volatile organic compounds exceeding Maximum Contaminant Limits. The Maximum Contaminant Limit is the largest amount of a contaminant that is allowed in drinking water supplied by a public water system. These levels are established by EPA under the Safe Drinking Water Act and may be used as cleanup standards at a hazardous waste treatment, storage or disposal facility. The current USACE monitoring well network at the landfill is comprised of twelve monitoring wells. It is anticipated that additional monitoring wells will be installed in 2013.

For more information see the USACE Fact Sheet on Bannister Former Landfill ([Appendix F](#)).

4.0 Community Involvement Goals

Everyone wants a clean and healthy place to work and live, and the DOE, GSA and USACE are committed to being good neighbors to our community by reducing and addressing releases to the air, water, and land.

Public participation plays an integral role in the environmental permitting process. This process brings government, facility owners and citizens together to make important decisions about hazardous waste management facilities. These groups and individuals have a stake in the facility, its operations, corrective action, or changes in its design or administration. As "stakeholders" they will communicate and interact throughout the permitting and corrective action process ([Appendix G](#)), particularly during public comment periods.

DOE and GSA are committed to providing ample and diverse opportunities for nearby residents, interested citizens, employees and others to get information and voice their views about environmental activities at the BFC. As regulators, EPA and DNR also are committed to providing opportunities for public participation. Recognizing that people prefer to receive information in a variety of ways and have different levels of interest in our environmental activities, this Community Involvement Plan shows what DOE and GSA have done to identify the community's issues, needs and concerns and the specific activities to address those concerns.

The overall community involvement goal for DOE and GSA is to help facilitate an exchange of information with the community and stakeholders about the hazardous waste permit process and environmental corrective action activities conducted at the BFC and to transition the BFC in a manner that involves the public in the decision making process.

4.1 The BFC Community

The BFC is located in Kansas City, Jackson County, Missouri. The 15-county Kansas City metropolitan area spans the border between Missouri and Kansas. As of the 2010 Census, the metropolitan area has a population of 2,035,334. It is the second largest metropolitan area in Missouri after St. Louis and the largest in Kansas. Specifically, the BFC is in a part of Kansas City known as south Kansas City which consists of the southern half of Kansas City, Missouri, as well as the suburbs of Grandview, Harrisonville, Belton, and Raymore. Jackson County has a population of 674,158 and is the second most populated of Missouri's counties, after [St. Louis County](#).

For the purposes of this CIP, our community now and in the past consists of the following:

- Area residents in close proximity to the BFC
- Elected officials and opinion leaders in Missouri and Kansas, especially those in the Kansas City metropolitan area
- Community Advisory Panel members and the constituents and sponsors they represent
- Special interest groups who want to be involved in the BFC environmental and transition process
- BFC employees and their families
- Interested members of the media in Kansas, Missouri and throughout the United States
- Other DOE sites, including DOE Headquarters, interested in our environmental activities and progress

- BFC Regulators such as DNR and EPA

5.0 Community Involvement History and Concerns

DNR, EPA, DOE and GSA are required to conduct specific public participation activities for steps in the hazardous waste permitting and corrective action process. These steps are outlined in state and federal hazardous waste laws and regulations. The public is notified of these activities through facility mailing lists, newspaper legal notices, radio announcements and news releases depending on the activity. The permitting documents, remediation plans and other documents are also made available to the public for review and comment. For over 20 years, leading up to the 2012 modification of the hazardous waste permit, GSA, DNR, EPA and DOE have made it a point to go beyond the activities that are required by law and regulation and use multiple outlets for giving the public an opportunity to ask questions, share information, express concerns and discuss issues at the BFC.

5.1 Community Newsletters and Surveys

As part of the ongoing effort to foster communication about environmental projects at the plant, the KCP surveyed residents via mail within a 1-mile radius and other stakeholders in the surrounding community in 1990, 1994, 1996, 1999, and 2003 to determine information needs and environmental concerns. In response to feedback, the KCP published a quarterly newsletter called *FOCUS on the Environment* from 1990 until 2006. In 2006, the KCP began incorporating environmental stories in the organization's quarterly newsletter *Connections* which was made available online.

5.2 Neighborhood Meetings

In 2004, additional public outreach activities (presentations) were conducted with civic groups such as Linden Hills Neighborhood Association, Blue River Watershed Association, and the south Kansas City Chamber of Commerce. The presentations focused primarily on PCBs at the 95th Terrace Site south of the BFC and the potential impact by PCB's on Indian Creek. The effort culminated with a neighborhood study and public meeting where regulatory authorities (DNR, Agency for Toxic Substance and Disease Registry, and EPA) presented their conclusion that PCBs in Indian Creek did not pose a health risk to the public. In 2011, BFC representatives began attending neighborhood association meetings in an effort to increase awareness of the current disposition activities and hazardous waste permit modification activities.

5.3 Community Involvement Plan

In 2006, a Community Involvement Plan ([Appendix I](#)) was updated to reflect additional efforts made to communicate to the public about the issues, concerns, and

environmental work at the KCP as required by the hazardous waste permit. The KCP also provides the public with access to plans, reports and public comments relating to environmental projects through a technical resources library located at the Blue Ridge branch of the Mid-Continent Public Library.

Since the time of the lagoon closures in the late 1980's, the public has been given the opportunity to discuss plant environmental activities and remediation plans submitted to the DNR and EPA in public hearings and meetings. The hearings and meetings were announced in mailings to plant neighbors and community leaders, notices published in local newspapers and more recently, online at www.kcp.com.

With the completion of the final hazardous waste permit modification in August 2012, a new requirement for the preparation of this CIP was mandated.

5.4 Additional Evaluations and Studies

In 2010, local media outlets began a series of reports about BFC worker safety and health concerns, primarily focused on GSA workers. In response, GSA requested that NIOSH, an agency of the Center for Disease Control, conduct a Health Hazard Evaluation ([Appendix H](#)). NIOSH stated in its interim report that employees in GSA-managed space had no significant exposure from substances in use now or in the past and that no cancer clusters existed among current and former BFC workers.

5.5 Community Advisory Panel

In an effort to enhance public involvement in BFC issues, a BFC Community Advisory Panel (CAP) was established in 2010. In addition to providing independent input on environmental and redevelopment issues, the CAP also acts as a communication conduit and forum for stakeholders within the community surrounding the BFC. Meetings are held about once every two months, although there is no set schedule. Members were nominated by key stakeholders in the community and represent a diversity of interests, including neighborhood associations, environmental groups, local residents, former BFC workers, and economic development organizations. They have received briefings on the environment from the GSA, USACE, DOE, EPA, and DNR as well as other topics of interest including redevelopment and respective missions. The public is welcome to attend meetings, which are scheduled by panel members, and hosted at the GSA Region 6 offices. Additional information about the CAP can be found at <http://www.epa.gov/region07/cleanup/bannister/>. Citizens interested in the CAP can contact the following:

Gerard Grimaldi, Truman Medical Center, Chairman
gerard.grimaldi@tmcmcd.org

Steve Rinne, Co-Chairman
srinne@edckc.co

Additional public involvement activities conducted since 2010 included:

- A coordinated communications effort among DNR, EPA, GSA, USACE and DOE to announce the hazardous waste permit modification request with public comments, notices, meetings and briefings to the CAP, the media, the public, local and national elected officials, and other key stakeholders
- Facility tours for CAP members and other stakeholders
- Briefings to key stakeholders such as the Kansas City mayor, area Chambers of Commerce, neighborhood associations, the media, and elected officials
- Participation in other public meetings held by other organizations.

5.6 Community Interviews

In accordance with EPA's RCRA Public Participation Manual, community interviews were determined to be a good method of assessing the community's concerns and interest in receiving information. In February 2012, community interviews were conducted with 21 individuals via the phone and in person in an effort to gather information that would be useful in developing this community involvement plan. The interview group consisted of CAP members, randomly selected area residents, and members of special interest groups. The individuals who took part in this research were intended to be a cross-section – from those with detailed, firsthand knowledge of the BFC to those whose only source of information is the local news media, to those whose level of awareness of the BFC is not much more than its location and that it is a “government facility.”

A professional survey company was selected to perform the interviews to increase the candor of the responses since some persons may not be as forthcoming with their concerns or issues if the interviews were conducted by BFC employees. This was a qualitative – rather than a quantitative – research process, reflecting the thoughts, ideas and concerns of the diverse group of 21 individuals who participated. A report prepared by the survey company documenting results of the interviews can be found in [Appendix J](#).

The following general themes were identified during the interviews:

Theme 1: Most individuals appear to have at least some rudimentary awareness of the BFC, its tenants and its activities, and an even greater awareness of the Complex's as-yet-undetermined future.

Theme 2: The overall opinion of the BFC was also quite diverse, with respondents getting their information from a variety of sources.

Theme 3: With some exceptions, the level of awareness of the specific roles of the parties to the process (DOE, GSA and environmental permitting and corrective action process) is limited. The interest of research participants appears to be less about *who* is taking care of the future disposition of the site (both environmental issues and the potential transfer of the property to new ownership) than that it gets handled properly and safely.

Theme 4: Traditional news media, well-publicized public meetings, and contact with community groups in and around the BFC would all be excellent venues for transmitting information. The key, according to the research participants, is not so much the venue, but the commitment to frequent updates.

The data gathered from the community interviews suggested that a more accelerated pace of public comment opportunities, town-hall-style meetings, news dissemination, and other communication strategies and tactics are important to the community. These factors will be important for a range of persons, including those who have a positive view of the environmental program at the BFC, those who are more neutral and need additional evidence that the right work is being planned and completed, and those who do not think that the right environmental work has or will be done.

6.0 Planned Participation Activities

Keeping in mind the results of the community interviews, regulatory requirements, and past experience with stakeholders, Sections 6.1 – 6.11 below describe the public participation activities planned for the BFC under the hazardous waste permitting and corrective action process. Section 6.12 provides a comprehensive list of site contacts including elected officials.

6.1 Expanded Facility List

Frequency: As needed

BFC public affairs personnel have expanded the BFC mailing list to include more than 1,200 area residents within a 1 mile radius of the facility as well as community and civic stakeholders. This mailing list will be used to notify residents and stakeholders of informational meetings, Permit updates and public notices. Residents and stakeholders may request to be added to the Facility Mailing List by contacting the Public Affairs office numbers listed in Section 6.2 below.

6.2 BFC Updates

Frequency: Twice a year or as appropriate during active investigations and any cleanup required

BFC public affairs personnel have developed a newsletter-type update for area neighbors and stakeholders. The initial issue was mailed to the BFC Facility Mailing List as well as community and civic stakeholders in December 2012 (**Appendix K**). The initial newsletter-type update included an option for residents to provide an e-mail address so that subsequent issues could be provided online to reduce paper resources. An online version will also be available on the website, www.kcp.com. In addition, persons may contact the following address to request a hardcopy of the newsletter or to be added to the mailing list.

U.S. Department of Energy Kansas City Plant
Public Affairs
14520 Botts Road
Kansas City, MO 64147
tsnyder@kcp.com
816-488-5937

6.3 Community Advisory Panel

Frequency: Quarterly

The DOE, GSA and USACE support the activities of the Community Advisory Panel (CAP). These three entities continue to present information and answer questions at regular CAP meetings. They will take into consideration suggestions for community involvement and public information opportunities as well as input on any remedial activities as specified under the hazardous waste permit.

6.4 Community Interviews

Frequency: Every two years or as appropriate

As a follow up to the February 2012 community interviews, additional interviews will be conducted after implementation of this CIP to measure plan effectiveness. Since some citizens may not be entirely forthcoming with their concerns or issues if the future interviews are conducted by BFC personnel, a third-party interviewer will again be selected to increase the candor of the responses. This will again be a qualitative – rather than a quantitative – research process, reflecting the thoughts, ideas and concerns of the diverse group interviewed.

6.5 Library Technical Document Repository

Frequency: As needed

Copies of the administrative record, which includes a copy of the hazardous waste permit application, hazardous waste permits, modification requests, reports, etc. and supporting documents for the BFC hazardous waste permit can be viewed and copied at the Blue Ridge Branch of the Mid-Continent Public Library, 9253 Blue Ridge Boulevard, Kansas City, Missouri 64138. Additionally, these documents are also available through the Missouri Department of Natural Resources, 1730 East Elm Street, Jefferson City, MO. To request a copy or to review the report, a sunshine request may be submitted to MDNR using the link: <http://dnr.mo.gov/sunshine-form.htm> or by contacting the Custodian of Records at (573) 522-1181 to make a review appointment and/or request copying (at a charge) of specific documents. The public can also review a copy of the administrative records at the EPA, Region 7 office 1121 Renner Boulevard, Lenexa, Kansas. Please call (913) 551-7166 to make an appointment.

6.6 Media Relations

Frequency: As needed

Press Releases will continue to be sent to local media to inform the community about activities related to the BFC environmental assessment and remediation, such as public meetings or site analysis. Media inquiries about environmental efforts at the BFC are welcomed, and responses will be provided in a timely manner. If desired, video footage may be provided to the media on request.

6.7 Neighborhood and Civic Group Meetings

Frequency: As requested

BFC representatives will continue to present information to interested neighborhood and civic groups as requested. In January and February 2012, presentations were made to those attending the regularly-scheduled meetings of the Center Planning

Board and Development Council, South Kansas City Council neighborhood meeting, and Marlborough Community Coalition and Southern Communities Coalition.

6.8 NEPA Public Involvement and Transition Activities

Frequency: As needed

DOE, with the assistance of GSA, worked to analyze and document the potential environmental impacts of various options for the future disposition of the BFC. As part of that process, public comments were gathered during the public scoping process and following the release of the draft NEPA document. Although all activities under NEPA (including public involvement activities) are guided by an entirely separate regulation, the overall comments and suggestions for the environment and future use of the BFC will be an integral part of the BFC community involvement efforts. This is noted here because the community members involved in that process are the same as those involved in the hazardous waste permit process, and the ultimate goal is to provide clear, consistent information and an understanding of what public comment avenues are available.

6.9 Public Comment Periods

Frequency: As required under the permit

Most recently, public and key stakeholders were given an opportunity to provide comments on the draft hazardous waste permit modification. EPA and DNR held a public hearing in May 2012. CAP members and other key stakeholders, including the public and the media, were notified through press releases, public service announcements, emails, letters and radio advertisements. More opportunities for public comment will be provided as required under the hazardous waste permit. Those types of opportunities will include draft permit modifications, permit renewals, and any proposed final remedies. In those situations, written comments are always welcome, and public hearings will be held upon request.

6.10 Public Information Meetings

Frequency: As required under the permit

The public will be given the opportunity to discuss plant environmental activities and remediation plans submitted to the DNR and EPA at informational sessions and public meetings. Information sessions are informal and allow one-on-one discussions with DOE and GSA and meetings are group settings with presentations. These public opportunities sessions will be announced in mailings to BFC neighbors and community leaders, through notices published in the Southland and City sections of the *Kansas City Star* and online at www.kcp.com. The meetings will be held near the BFC. Examples of public meeting notices are included in [Appendix L](#).

6.11 Website Resources

Frequency: As needed

BFC public affairs personnel from GSA, USACE and DOE will continue to post pertinent information, including fact sheets on the environmental assessment and remediation of the BFC as well as information about the BFC redevelopment process. A new feature graphic and Health, Safety and Environment link was added to the KCP homepage to increase the visibility of website links. Citizens will be advised of the website address and information will also be posted to guide public comments about the BFC.

Interested individuals who wish to receive an electronic notice when DNR adds information to their BFC Web page may go to that web page (www.dnr.mo.gov/env/hwp/permits/mo9890010524/information.htm) and click on the "red envelope" at the top of the page that states "Click to receive updates on this issue."

Other useful websites include the following:

<http://www.epa.gov/region7/cleanup/bannister/index.htm>

<http://r6.gsa.gov/bannister/banenv.asp>

www.kcp.com

6.12 Site Contacts

The information below provides pertinent contact information for individuals with knowledge of the Bannister Complex. Contact information for local neighborhood groups is provided as well as federal, state and local elected officials. Internet resources are also listed.

AGENCY	RESOURCES ON THE INTERNET
<p>U.S. Department of Energy Kansas City Field Office Public Affairs 14520 Botts Road Kansas City, MO 64147</p> <p>Gayle Fisher gfisher@kcp.com 816-488-5476</p> <p>Technical contact: David Caughey dcaughey@kcp.com 816-488-3449</p>	<p>www.kcp.com</p>

<p>U.S. Department of Energy Kansas City Plant Honeywell Public Affairs 14520 Botts Road Kansas City, MO 64147</p> <p>Tanya Snyder tsnyder@kcp.com 816-488-5937</p> <p>Technical contact: Joe Baker jbaker@kcp.com 816-488-7332</p>	<p>www.kcp.com</p>
<p>U.S. General Services Administration Region 6 Public Affairs 1500 E. Bannister Rd Kansas City, MO 64131</p> <p>Angela Brees angela.brees@gsa.gov 816-823-2931</p> <p>Technical contact: Kevin Phillips Kevin.phillips@gsa.gov 816-823-1200</p>	<p>Link for recent testing performed at GSA, including NIOSH Interim Report 4/13/2011: http://r6.gsa.gov/bannister/banenv.asp</p>
<p>U.S. Army Corps of Engineers Public Affairs 460 Federal Building 601 E 12th Street Kansas City, MO 64106</p> <p>Saqib Khan Saqib.Khan@USACE.army.mil 816-389-3486</p>	

<p>U.S. Environmental Protection Agency Region 7 Community Involvement 11201 Renner Boulevard, Lenexa, Kansas 66219</p> <p>Beckie Himes himes.beckie@epa.gov 1-800-223-0425</p> <p>Technical contact: Bob Aston Aston.robert@epa.gov 1-800-223-0425</p>	<p>Link for compliance history: www.epa-echo.gov choose: "Hazardous Waste Search" enter EPA ID# MO9890010524 click on red box with "C" to see Enforcement and Compliance History</p> <p>Link for Bannister Federal Complex information: http://www.epa.gov/region7/cleanup/bannister</p> <p>Link for RCRA info: http://www.epa.gov/enviro/facts/rcrainfo/search.html choose: "Handler ID" enter: MO9890010524</p>
<p>Missouri Department of Natural Resources Hazardous Waste Program, Permits Section P.O. Box 176 Jefferson City, MO 65102</p> <p>1730 East Elm Street Jefferson City, MO 65101</p> <p>Ramona Huckstep ramona.huckstep@dnr.mo.gov (573) 522-1540</p> <p>Heidi Rice heidi.rice@dnr.mo.gov (573) 291-1417</p> <p>Technical contact: Don Dicks don.dicks@dnr.mo.gov (573) 751-3553</p>	<p>Link for the Permit Modification: http://www.dnr.mo.gov/env/hwp/permits/activeepa.htm</p> <p>Link for DNR's information on DOE/KCP: http://www.dnr.mo.gov/env/hwp/permits/mo9890010524/information.htm</p> <p>Link for public comment to DNR: http://www.dnr.mo.gov/env/hwp/permits/notices.htm</p> <p>Interested individuals who wish to receive an electronic notice when the Department adds information to their BFC Web page need to go to that web page http://dnr.mo.gov/env/hwp/permits/mo9890010524/information.htm and click on the "red envelope" at the top of the page that states "Click to receive updates on this issue."</p>

**Bannister Federal Complex
Neighborhood and Stakeholder Groups**

South Kansas City Chamber of Commerce

406 E. Bannister Rd., Ste. F
Kansas City, MO 64131
816-761-7660
Vicky Wolgast, Executive Director
vwolgast@southkcchamber.com

Blue River Watershed Association

P.O. Box 7276
Kansas City, MO 64132
816-739-2023
Leslie Alford, Executive Director
lalford@brwa.net

Ruskin Heights Homes Association

P.O. Box 9697
Kansas City, MO 64134
ruskinhtshoa@gmail.com
Ellen Cook, President
816-721-6050
Board meetings – 2nd Tuesday of each month/ Homeowner meetings in May/Nov

Marlborough Community Coalition

Betty Ost-Everly
816-444-1010
baost@hotmail.com

Linden Hills Neighborhood Association and Trailside Center

Chuck Loomis
9901 Holmes Rd.
Kansas City, MO 64131
816-942-3581
info@trailsidecenter.org

Community Advisory Panel

Gerard Grimaldi, Truman Medical Center,
Chairman gerard.grimaldi@tmcmcd.org
Steve Rinne, Co-Chairman
srinne@edckc.com

Southern Communities Coalition (umbrella group of 26 South KC neighborhoods)

Carol McClure
816-966-0855
cafrmc@att.net

Center Planning & Development Council

Carole Winterowd
816-444-1717
ca2wife@aol.com

Waldo Homes Association Simon

Moeller, President P.O. Box 8573
Kansas City, MO 64114
816-301-7990
president@waldohomes.org

Local Television Stations

Contact	Station	Address	Phone Number
News Editor	KCPT-TV19/PBS kcpt.org	125 East 31st Street Kansas City, MO 64108	816-756-3580
News Editor	KCTV-5/CBS newsdesk@kctv.com	4500 Shawnee Mission Parkway Fairway, KS 66205	913-677-7211
News Editor	KSHB-TV41/NBC desk@kshb.com KMCI-38 The Spot PAX	4720 Oak Kansas City, MO 64112	816-932-0701
News Editor	KMBC-TV9/ABC kmbcnewstips@ thekansascitychannel.com	1049 Central Kansas City, MO 64105	816-221-9999
News Editor	WDAF/TV4/FOX news@wdaftv4.com	3030 Summit Kansas City, MO 64108	816-932-9201

Local News outlets

Contact	Newspaper	Address	Phone Number
News Editor	Kansas City Business Journal kansascity@bizjournals.com	1100 Main St., Kansas City, MO 64105	816 421-5900
Chuck Howland, News Editor	Kansas City Star chowland@kcstar.com	1729 Grand Blvd., Kansas City, MO 64108	816 234-4782

Federal, State and Local Elected Officials

U.S. Senator Roy Blunt, 816-471-7141
911 Main St. Ste 2224, Kansas City, MO 64105

U.S. Senator Claire McCaskill, 816-421-1639
4141 Pennsylvania Ave. Ste. 101, Kansas City, MO 64111

U.S. Representative 5th District Emanuel Cleaver, 816-842-4545
211 West Maple Ave., Independence, MO 64050

Missouri State Senator, 9th District, Kiki Curls, 573-751-3158
201 W. Capitol Ave, Room 434, Jefferson City, MO 65101

Missouri State Representative, 26th District, Gail McCann Beatty,
573-751-2124
201 W. Capitol Ave, Room 130DB, Jefferson City, MO 65101

Kansas City Council, 5th District at Large, Cindy Circo,
816-513-1368

Locations Routinely Used for Public Meetings

- Evangel Church Fellowship Center, 1414 E. 103rd. St, Kansas City, MO 64131
- IBEW Local Union 124 Meeting Hall, 301 E. 103rd Terrace, Kansas City, MO 64114

Citizens interested in the CAP can contact the following:

- Gerard Grimaldi, Truman Medical Center, Chairman at gerard.grimaldi@tmcmcd.org
- Steve Rinne, Co-Chairman at srinne@edckc.co

In addition, persons may contact the following address to request a hardcopy of the newsletter or to be added to the mailing list.

U.S. Department of Energy's Kansas City Plant
Honeywell Public Affairs
14520 Botts Road, Kansas City, MO 64147
tsnyder@kcp.com or 816-488-5937

7.0 Conclusion

This Community Involvement Plan will be updated every five years or when a major/milestone event is reached to reflect community preferences as well as environmental activities at the BFC. During active investigations and any cleanup required, DOE, GSA and USACE plan to keep residents and interested stakeholders informed and involved with the activities listed. USACE will coordinate with DOE and GSA to ensure that up-to-date information on their work at the former landfill is provided to the public. The public will also be kept abreast of any reuse scenarios proposed for the BFC as it is expected that any selected remedy for the facility will be based on a selected reuse scenario.