

Public Communication Lessons Learned on Sandia's Environmental Restoration Project

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Background

- Over the 15 years of Sandia's Environmental Restoration Project, 268 designated sites required restoration from legacy contamination remaining from Cold War era testing.
- Various levels of complexity and rigor depending on the size of the site, the testing involved and the residual contaminants of concern (HE, metals, PCBs, VOCs, SVOCs, chemicals, radioactivity, etc.).
- It ranged from excavation of former landfills, remediation of surface and subsurface contaminants, cleanup of groundwater contaminants or documenting that no restoration was even required.



Approach

- At all sites, the public was informed as to the proposed actions, and in many instances, their input was taken into consideration for the final remedial action planned.
 - Poster sessions,
 - Citizen Advisory Boards,
 - Public meetings,
 - Public reading rooms and
 - Public hearings
 - Site tours

The entire process was as transparent.

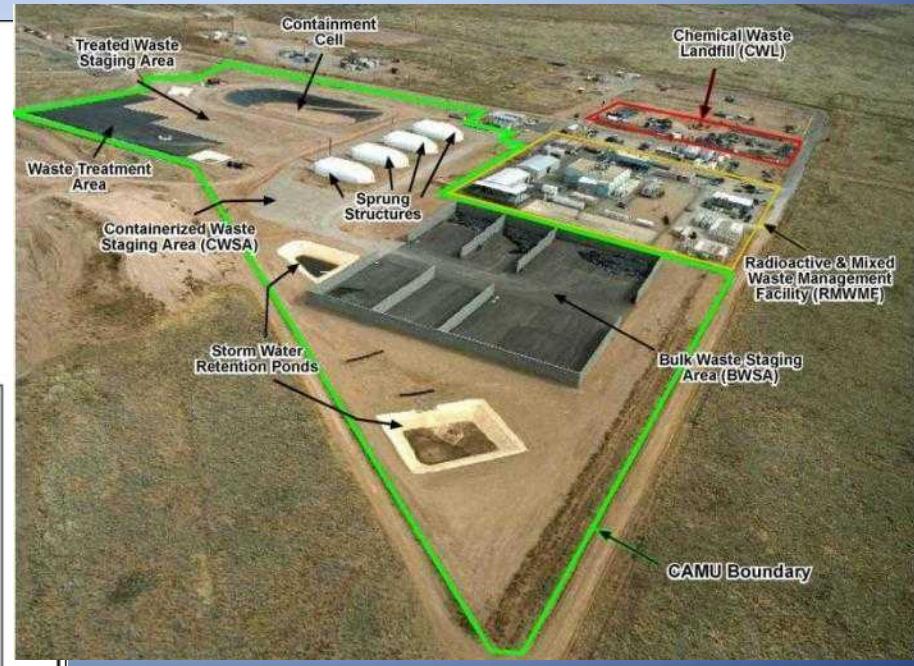
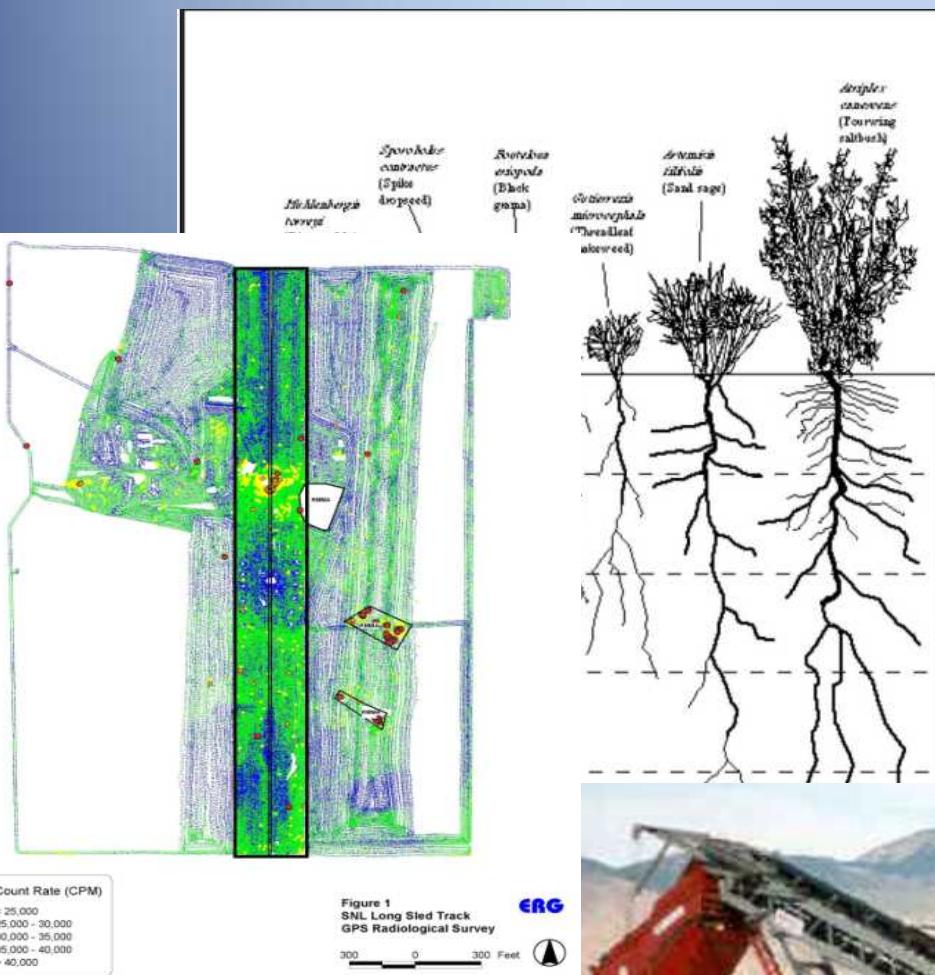


Examples



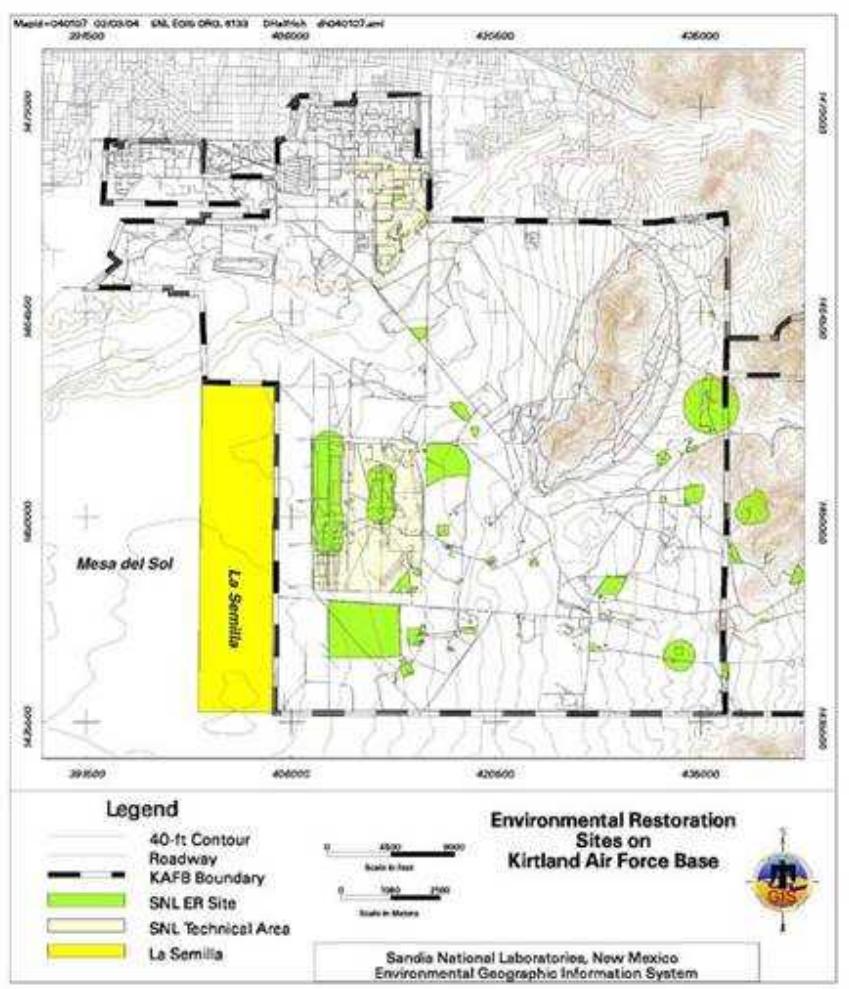


... More Examples





Sandia's Mixed Waste Landfill



- MWL Background Characterization
- Results of Characterization
- Technical Issues
- MWL Corrective Measures Study
- NMED Draft Permit Modification



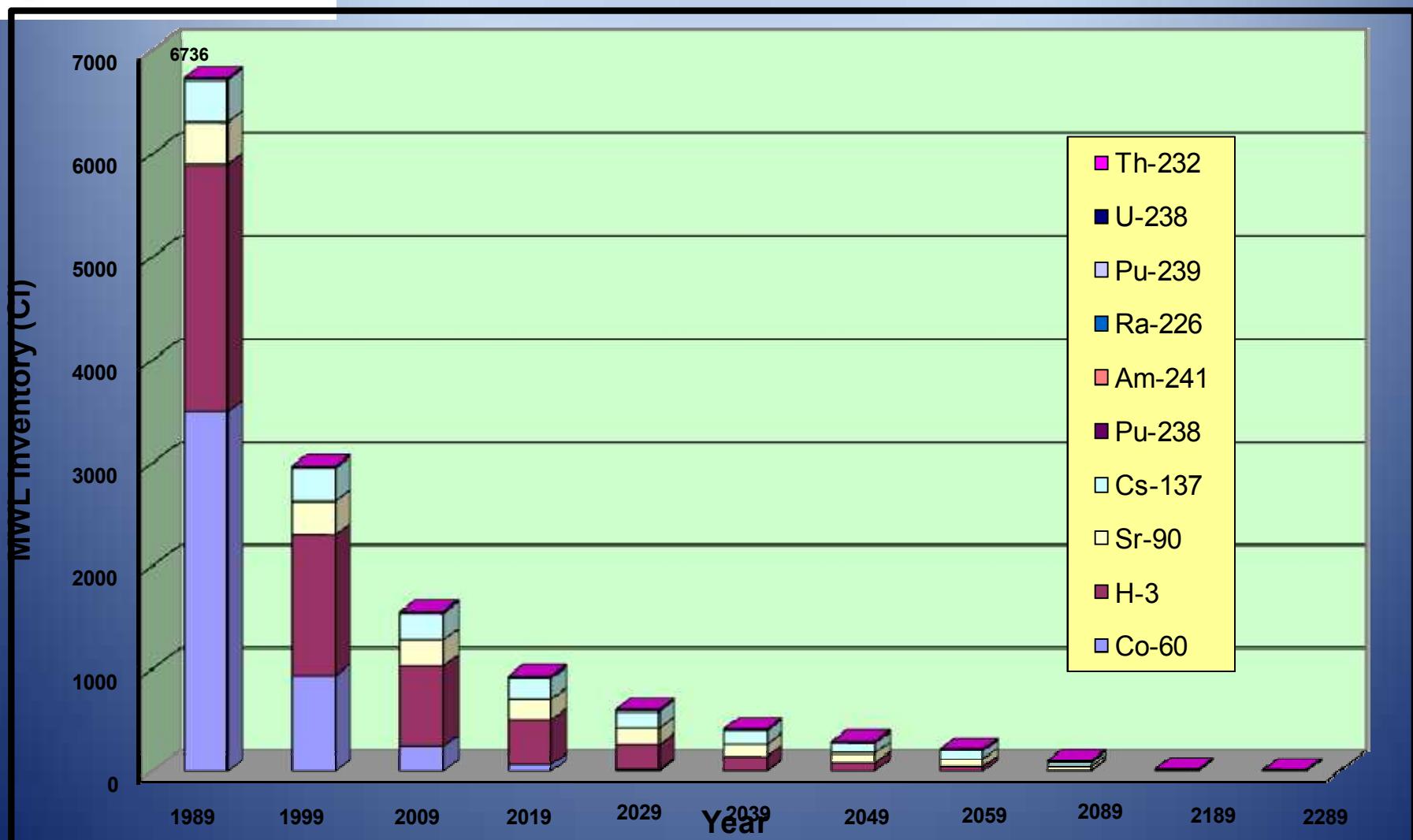
Characterization of the MWL



- Geophysical surveys
- Active/passive soil gas
- Surface soil sampling
- Instantaneous profile test
- Vadose zone characterization
- Borehole sampling
- Ground water sampling
- Air sampling
- Tritium sampling
- Risk assessments



MWL Radioactive Material Inventory





MWL Corrective Measures Study

Evaluation of Alternatives

- Alternatives Evaluation – Total Costs *
 - NFA with IC's: \$1.8 M
 - Vegetative Soil Cover: \$4.3 M
 - **Vegetative Soil Cover with Bio-Barrier:** \$7.1 M
 - Future Excavation with Above-ground
Retrievable Storage: \$326 M
 - Future Excavation with Off-site Disposal: \$618 M
- EPA states that costs should be considered when choosing among candidate alternatives that meet all evaluation criteria
 - Some public's perception is the cost should NOT be considered

* costs indicated include various direct and indirect charge assumptions



It's Simple, but Sometimes It's not Easy

- In spite of the best intentions of this public outreach effort, there were a few instances of intense disagreement (with a few opponents) as to what constituted appropriate remediation.
- Staff learned that public communication involves more than presentation of “just the facts, ma’am”.
 - Additional challenge of large, changing team of using consistent “facts”.
- Final actions were sometimes based on political as well as technical considerations.
- In some instances, the facts spoke for themselves and there was little concern. In other instances, the public had concerns that were not assuaged by the facts as presented.



Failing to Plan is Planning to Fail

- Considerable consternation, credibility, loss of trust and unwarranted taxpayer expense could have been avoided by early recognition of issues to which the public were overly sensitive and the development of a strategic communication plan that was proactive rather than reactive.
- More effective communication may have resulted in lower overall Project costs.



Observations – I

- Always be completely thorough, honest, professional and transparent (and brief ... Miranda Rights).
- Don't ever expect that contentious issues will be treated “objectively” by pro/con participants.
- There is science, and then there is politics. If you expect to prevail, be aware that the latter may outweigh the science.
- Everyone is entitled to their own opinions, but we must make decisions based on facts!



Classic Example

- The White House ordered the shutting down of the Yucca Mountain nuclear waste site inside the mountains in southern Nevada. The cancellation is a huge favor to the Senate Majority leader. Nuclear power doesn't contribute to global warming, but the president decided it's more important to save Harry Reid than the Earth
 - Argus Hamilton

❖ millions were spent on the MWL based on politics and not science



Observations – II

- Do everything possible to avoid a situation that will end up in a Public Hearing or legal fight. Consider it as a worst-case scenario, and strive to avoid it. However, if you are not willing to compromise on certain issues, a public hearing may be unavoidable and time spent trying to avoid a hearing may be better spent elsewhere.
- In a legal proceedings, give your formal presentation with a WRITTEN script. You will need it during cross-exam!
- In a legal proceedings, a court reporter records every word spoken. Transcripts available to public.
- Know your technical details inside and out, and be your own worst critic. You'd be *amazed* at the creativity that interveners have to find real (or imagined) fault with your arguments.



Observations – III

If you sense that things will inevitably move from straightforward “public information” meetings, to a more formal legal process, fast-forward to the latter, saving everyone time, frustration and expense.



Observations – IV

- It's ironic than significant intervenor funding ultimately came from DOE funds (Dept. of Justice Ruling).
- Management must have confidence in technical staff and be ready to back them up.
- “No” is a word that is not used often enough when resolving disputed issues.
- Management needs to accept some degree of risk.
- Management needs to expect some degree of negative publicity.



Observations – V

- Management needs to be ready to defend the technical bases upon which decisions are based.
- Otherwise, questions from regulators and adversaries (at different times) get more credence than they deserve. In futile attempts to placate them, unjustified concessions are made, which lead to unjustified cost increases.
- **Warning: Choose your Battles!**



Observations – VI

From the very beginning of a project, track the actual additional costs (when possible) that may accumulate during any public interaction process.



Observations – VII

- From the beginning, an accurate accounting of the FOIA requests, their topics, our responses should be established and kept. Otherwise, significant duplicative effort can be expended on retrieving FOIA request information that had been retrieved sometime (or several times) previously.
- This is because the interveners may keep no track of the requests themselves, or re-submit additional requests in the attempt to force a project to squander resources chasing after them. Maintenance of accurate records, can easily discredit this shameless ploy by documenting that some requested information had already been provided.



Observations – VIII

- From the very beginning, a Strategic Communication Plan and activity needs to be an integral of a project.
- Without it, everything you do will be reactive rather than proactive.



Observations – IX

- At the first hint of resistance, a project needs to recognize the potential significance and its potential impacts.
- A broad, systematic strategic approach to a project should at least be “brainstormed” to address a “worst case scenario”, including time and cost.



Observations – X

- It should be recognized that long delays to a project will inevitably lead to significant loss of personnel, continuity and institutional memory.
- These losses will undermine the robustness with which a project can deal with interveners, lessen your credibility and strengthen the intervener's position.
- For example, the intervener had vastly more “tenure” on a contentious issue than our own, newly assigned “expert”. Ouch!



Conclusions

- Transparency is a “Given”
- Science, but also Politics at an Equal Level
- Strategic Communication Plan
- Where Feasible, Track Total Project Costs
- Track FOIA Costs and Document Requests
- **If you have the facts, pound the facts** (if you don't have facts, pound the table!)