



# Community Involvement at Federal Facilities

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This course will go over community involvement requirements and activities at federal facility Superfund sites listed on the National Priorities List (NPL) in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

## Overview

- ☐ Lead Agency Role at Federal Facilities
- ☐ Levels of Community Involvement (CI)
- ☐ NPL Listing Actions
- ☐ Removal Actions
- ☐ Remedial Actions
- ☐ Post-ROD Actions
- ☐ Community Involvement Tools
- ☐ Case Study



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To begin, we will look at the role of the lead agency and the regulatory agencies and the varying levels of community involvement (CI). We will then look at community involvement activities associated with NPL listing, removal actions, remedial actions, and post-Record of Decision (ROD) actions. We will end the course with a summary of community involvement tools and a case study of a challenging community involvement event.



## COMMUNITY INVOLVEMENT: LEAD AGENCY ROLE

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### “Lead Agency” Definition

- The National Contingency Plan (40 CFR 300.5) states that:
  - The **Lead Agency** is the agency that provides the On-Scene Coordinators (OSCs)/Remedial Project Managers (RPMs).
  - The Department of Defense (DoD) or Department of Energy (DoE), then DoD or DoE will be the **lead agency** for their sites.
  - For sites other than those of EPA, the US Coast Guard (USCG), DOD, or DOE, then that other federal agency will be the **lead agency** for remedial actions and removal actions other than emergencies.

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The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR 300.5) states the cases where another federal agency besides EPA serve as the lead agency.

- The Lead Agency is the agency that provides the On- Scene Coordinators (OSCs)/Remedial Project Managers (RPMs) to plan and implement response actions under the NCP.
- In the case of a release of hazardous substance, pollutant or contaminant, where the release is on or where the source of the release is from any facility or vessel under the jurisdiction, custody, or control of Department of Defense (DoD) or Department of Energy (DoE), then DoD or DoE will be the lead agency.
- In the case of a release on or the source of the release is from any facility or vessel under the jurisdiction, custody, or control of a federal agency other than EPA, the US Coast Guard (USCG), DOD, or DOE, then that agency will be the lead agency for remedial actions and removal actions other than emergencies.

## Role of Federal Agencies



- At Federal Facility sites (i.e., Departments of Energy, Defense, Interior, etc.), the other federal agency (OFA) is the lead agency for community involvement activities
- EPA conducts regulatory oversight and ensures that community involvement requirements are being met
- Successful community involvement requires coordination from all agencies

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EO 12580 delegated presidential authorities under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) to the heads of various Executive Branch agencies under certain circumstances. In exercising these powers, such agencies are given the responsibility to provide for public participation. This means that those federal agencies are the lead agency for CERCLA actions and community involvement activities at federal facilities.

The foundation of effective community involvement at NPL sites generally starts with a commitment to the principle that the public should be meaningfully involved in decision-making. EPA should work with the federal agency to ensure that the community involvement requirements in any federal facilities agreement (FFA) are fulfilled, including the federal facility's obligations to:

- Fulfill the community involvement activities required by CERCLA or addressed in the NCP.
- Involve the community throughout the cleanup process, within resource constraints.

## Community Involvement in Federal Facility Documents

- Interagency Agreement (IAG) commonly known as a Federal Facilities Agreement (FFA) contains specific information on CI
  - FFAs are site-specific
  - Delineate activities at each remediation step
  - Define responsibilities of federal agency
- Site Management Plan has milestones of interest to the community
  - Component of many FFAs
  - Identifies key remedial action processes, milestones, and necessary documents
- EPA's Primary Role: provide oversight and act as advisors and/or partners in CI Program development with the lead agency


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Once the site is listed on the NPL, the Superfund process and community involvement activities apply equally at Federal Facilities using CERCLA authority. For Federal Facilities on the NPL, CERCLA requires an Interagency Agreement (IAG) or Federal Facilities Agreement (FFA). The FFA usually includes CI activities, and the EPA Remedial Project Manager (RPM), as advised by the Community Involvement Coordinator (CIC) (if one is assigned to the site), should ensure that CI is adequately addressed. The Site Management Plan is a component of the FFA and identifies necessary documents, processes, and milestones. The best way to ensure CI is adequately addressed is to ensure the Federal Facility prepares a Community Involvement Plan or similar document.

Compliance with Superfund CI objectives is tempered by budget constraints and fiscal uncertainties. These two facets of government impact programs nationwide. The challenge is to assure the community that site cleanup continues to be efficient and effective by planning for budget contingencies internally within the site team and externally with the community. If the site has been on the NPL for some time, CI activities and requirements may vary depending on what phase of the Superfund process the site is in. While required CI activities may be sufficient to meet the needs of the affected community, site teams should continually assess the situation to determine if additional activities are needed to fully engage the community.

## At Federal Facility Sites on the NPL, the EPA Should:

1. Ensure all applicable federal rules and regulations governing community involvement (CI) are being implemented by the Federal Facility.
2. Encourage the lead federal agency to advocate for early and meaningful CI.
3. Become familiar with the Federal Facilities Agreement (FFA).
4. Offer advice, as appropriate, about planning and implementing CI activities.
5. Bring community issues to the site team's attention with best practices to address the situation.
6. Immediately address any lapses in agreed-upon CI procedures or milestones in the FFA.



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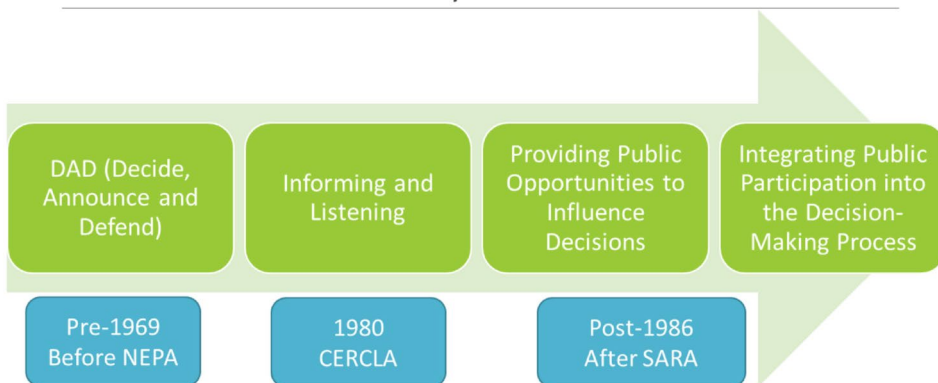
When federal agencies have lead cleanup authority at NPL sites, they typically have the lead responsibility for CI. EPA's primary role at Federal Facility sites on the NPL tends to be providing oversight of the other federal agency's CI activities to ensure that the CERCLA/Superfund requirements, EPA guidance, and the NCP requirements are met. EPA's RPM and CIC act as advisors, and in the most successful instances, a partner in the development and implementation of the other agency's CI program. EPA site teams should work closely with the Federal Facility lead so that an effective CI approach is developed while carefully considering resource constraints.

CERCLA and NCP provisions on early and meaningful community involvement and the basic approach to community involvement apply equally to federal sites as they do to private sites. However, because other federal agencies often have the lead cleanup authority, they

also have the lead responsibility for community involvement activities. It is important for the EPA to develop prompt and effective communication and coordination with the lead federal agency. The EPA should work closely with, advise, and partner with the lead federal agency to monitor community needs and suggest additional outreach and CI activities where appropriate. Promptly addressing any lapses in agreed-upon CI procedures or milestones is very important. Taken from [June 2016 Superfund Community Involvement Handbook](#) (pg. 101).

## Levels of Community Involvement

## History and Trends in Superfund Community Involvement



# Community Involvement at Federal Facilities Federal Facilities Academy

As a result of the National Environmental Policy Act in 1969 (NEPA), community involvement in the U.S. evolved from the paternalistic “Decide, Announce and Defend (DAD)” approach to more inclusive stakeholder involvement by integrating the community into the decision-making process. NEPA requires that environmental impact studies be performed on large federal actions (e.g., highways), informing the public and receiving public comments.

In 1980, Congress made public involvement in decision-making an important part of the cleanup process when the Superfund program was established by CERCLA. The role of community involvement in Superfund decision-making was strengthened by the Superfund Amendments and Reauthorization Act (SARA) in 1986. The NCP describes EPA’s process for conducting Superfund community involvement. Since 1986, the government began actively informing the public, seeking comments, and factoring those comments into decisions. Many times, public comments resulted in a government agency altering its proposed solutions. In fact, there are examples at Superfund sites where EPA has altered a proposed remedy to clean up a site based upon community input.

The EPA agency-wide Public Involvement Policy affirms the Superfund approach to community involvement. The policy reflects the change of perception about community involvement not just within EPA, but also the country. Community involvement within EPA’s programs has evolved because EPA has learned that community involvement improves the decision-making process and the Agency’s decisions. Not only are the Agency’s decisions better, they are more likely to be accepted by the community when the community feels it has and continues to play an integral part in the decision-making process

Spectrum of Community Involvement				
OUTCOME	GOAL	PURPOSE	PROMISE: We Will	EXAMPLES
Outreach	Inform	Provide Information	Keep you informed	Websites Fact Sheet Phone Hot Line Press Release
Information Exchange	Consult	Provide & exchange data, opinions, and options	Listen, acknowledge concerns & aspirations, & provide feedback on how your input influenced our decision	Individual Interviews Public Meeting Public Comment Availability Session
Recommendations	Involve	Obtain useful & influential advice or comments	Take your advice or comments into account when making a decision	TAGs CAGs RABs TAGs Task Force
Agreements	Collaborate	Reach workable agreement or settlement	Work in good faith to reach an understanding that we can all support & implement as agreed	Community Involvement Plan Interviews Institutional Control Oversight
Stakeholder Action	Empower	Empower stakeholders to take action	Support your decision & assist in your implementation	Voluntary Program Good Samaritan Program Superfund Redevelopment Initiative

Acronyms in Figure:

TAGs: Technical Assistance Grant

RABs: Restoration Advisory Board

CAGs: Community Advisory Group



The figure is an EPA variation of the International Association of Public Participation (IAP2) Federation Spectrum of Public Participation, P2 Pillars, and can be found at <https://www.epa.gov/international-cooperation/public-participation-guide-selecting-right-level-public-participation>. This table depicts different stages in the stakeholder involvement spectrum. It is up to the site team to decide what the goal/outcome of the community involvement effort will be and to communicate that both internally and externally to the community.

It is a legal requirement to inform the public and respond to public comments at specific steps in the Superfund cleanup pipeline, so at a minimum you will be performing activities noted in the first two rows of the table, or levels of the spectrum. Keep in mind, the level of involvement will depend on the site. At some sites, it is not necessary to move past the “inform” level because of a lack of citizen interest, and the site team can proceed with the decision without citizen input as long as the opportunity for input was provided. However, in other cases, it will be necessary to involve and collaborate with communities to reach decisions.

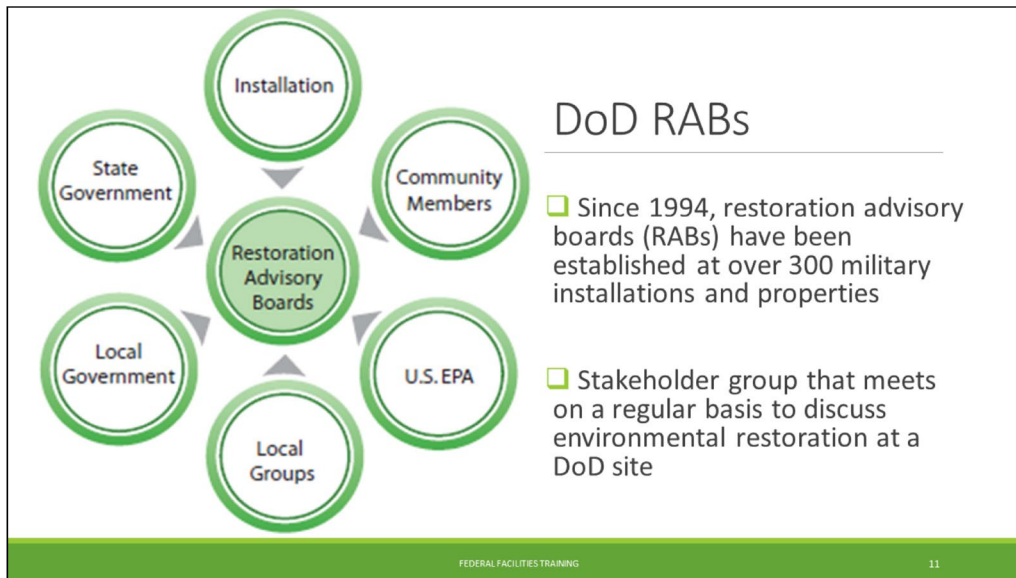
The bottom line is to decide what stage you are at for your community involvement effort. Be very clear to internal and external audiences about your intention. If your intention is just to inform, then do not indicate you expect or want citizen input (i.e., if the decision is a “done deal,” than say so).

### Special Consideration at Federal Facility Sites

- Community Advisory Boards
  - Department of Defense Restoration Advisory Boards (RABs)
  - Department of Energy Site-Specific Advisory Boards (SSABs)
- Ingredients for Advisory Board Success
  - Represent a broad range of community interests
  - Have good working relationships with the federal agency
  - Participate in site decisions
  - Keep the community informed about the Board's activities
  - Provide opportunities for community participation at meetings

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CI at federal facilities merit special consideration inasmuch as DOD RABs and DOE SSABs offer local stakeholders' opportunities to participate at sites that have both remedial and removal cleanups. RABs are typically established at a DOD NPL site where there is sufficient and sustained community interest, and SSABs exist at several DOE sites. These boards are comprised of representatives of the lead agency, EPA, major stakeholder groups and concerned citizens who are committed to reviewing site plans and sometimes receiving technical assistance. EPA works with DOD and DOE and their respective stakeholders at the local level by providing technical and regulatory input. Many times, the RPM and CIC are represented at their meetings.



DOD and EPA issued joint guidance in 1994 on RAB Implementation Guidelines

<https://www.epa.gov/fedfac/restoration-advisory-board-rab-implementation-guidelines>.

RABs are an expansion of DoD's Technical Review Committee (TRC) concept. The boards are a forum for exchange of information and partnership among citizens, the installation, EPA, and State. Most importantly, they offer an opportunity for communities to provide input to the cleanup process. It is DoD and EPA's view that RABs will improve DoD's cleanup program by increasing community understanding and support for cleanup efforts, improving the soundness of government decisions, and ensuring cleanups are responsive to community needs.

RABs bring together people who reflect the diverse interests within the local community, enabling the early and continued flow of information between the affected community, DoD and environmental oversight agencies. DoD is creating RABs to ensure that all stakeholders have a voice and can actively participate in a timely and thorough manner in the review of restoration documents. RAB community members will provide advice as individuals to the decision-makers on restoration issues. It is a forum to be used for the expression and careful consideration of diverse points of view. The RAB complements other community involvement efforts but does not replace them. The DoD installation will continue to be responsible for fulfilling all statutorily mandated public involvement requirements.


On May 12, 2006, the RAB Rule was issued (71 Federal Register 27610). The RAB Rule Handbook (2007) provides more specific information on the use of RABs.

[\(http://www.denix.osd.mil/rab/home/unassigned/rab-rule-handbook/\)](http://www.denix.osd.mil/rab/home/unassigned/rab-rule-handbook/)



## DOE EM SSABs

□ The Environmental Management (EM) Site Specific Advisory Board (SSAB) was created to involve stakeholders more directly in DOE EM cleanup decisions.



□ Local Boards

- [Hanford Advisory Board](#)
- [Paducah Citizens Advisory Board \(CAB\)](#)
- [Portsmouth SSAB](#)
- [Northern New Mexico CAB](#)
- [Nevada SSAB](#)
- [Oak Ridge SSAB](#)
- [Savannah River Site CAB](#)
- [Idaho Cleanup Project CAB](#)

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The Environmental Management (EM) Site Specific Advisory Board (SSAB) was created in 1994 to involve stakeholders more directly in DOE EM cleanup decisions. Currently, there are 8 local boards around the DOE EM Complex.

The EM SSAB's activities are governed by the Federal Advisory Committee Act (FACA), which was enacted to ensure that board deliberations are open and transparent to the public. Members of the EM SSAB local boards are made up of representative members of the community around DOE sites, not necessarily experts. FACA formalizes the advisory board process. It requires that all meetings be open and accessible to the public, meetings be announced in the Federal Register, all documents be maintained for the life of the board, membership be made of a diversity of interests, and there be time allotted at each meeting for public comment. DOE is required to formally respond to each recommendation made by a local board. All of the local boards of the EM SSAB have both a state and EPA liaison. While the state and EPA liaisons are not voting members of the board, local boards should allot time (if requested) at any meeting to allow the state or EPA to address the board.

Please note that each local board listed is a hyperlink and will direct you to the specific board's website for more information. More information is also available at <https://energy.gov/emssab>.

- [Hanford Advisory Board](#)
- [Paducah Citizens Advisory Board \(CAB\)](#)
- [Portsmouth SSAB](#)
- [Northern New Mexico CAB](#)
- [Nevada SSAB](#)
- [Oak Ridge SSAB](#)
- [Savannah River Site CAB](#)
- [Idaho Cleanup Project CAB](#)

## Advisory Boards and Community Involvement

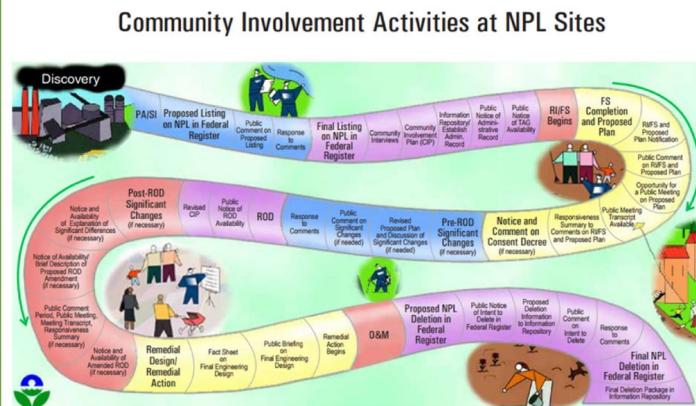
- ❑ EPA should participate as a liaison at advisory board meetings to provide an EPA perspective to board members and hear their concerns
  - All FFA agencies should be involved in these meetings
- ❑ Keep in mind that advisory boards do not replace community involvement
- ❑ The lead agency is still expected to conduct community involvement activities with the broader public

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It is important to recognize that advisory boards, both RABs and SSABs, are not a replacement for community involvement. These boards often represent a small group of active stakeholders and can provide very useful recommendations to the corresponding federal agency; however, working to involve the broader community affected by the cleanup decisions being made is necessary.

### Community Involvement Opportunities at NPL Sites



Community Involvement and Outreach Center  
Office of Emergency and Remedial Response  
U.S. EPA Phone: 703-603-XXXX  
Arling House Building Fax: 703-603-8100  
1200 Pennsylvania Ave., NW <http://www.epa.gov/superfund>  
Washington, DC 20460

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<https://semspub.epa.gov/work/HQ/174752.pdf>

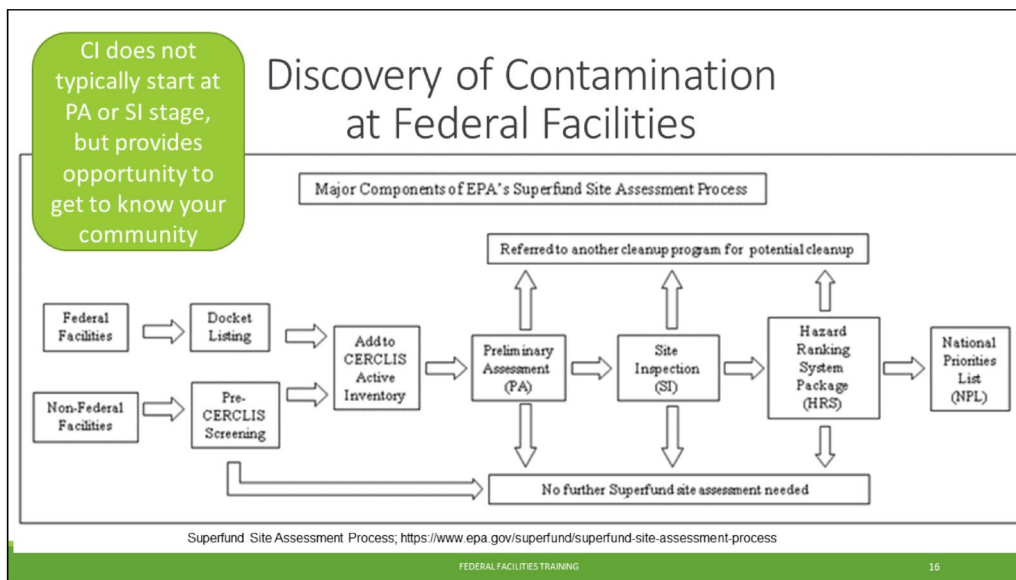
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This slide presents all the CI opportunities at each important Superfund process step at NPL sites. Appendix A of the 2016 Superfund CI Handbook contains all the regulatory citations and responsible party for CI outreach. Page 35 of the handbook identifies a few changes from this slide.

# Initial NPL Listing Community Involvement

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Site assessment often begins with Federal Facilities when the facility has been listed on the Federal Agency Hazardous Waste Compliance Docket (Docket) (2016 EPA CI Handbook, Chapter 3, p. 26). Section 120(c) of CERCLA requires EPA to establish this Docket of Federal Facilities which are managing or have managed hazardous waste or have had a release of hazardous waste. Thus, the Docket identifies all Federal Facilities that must be evaluated to determine whether they pose a risk to human health and the environment and it makes this information available to the public.

EPA, state and tribal partners, or the appropriate federal agency then conducts a Preliminary Assessment (PA). If warranted, a Site Inspection (SI) or other more in-depth assessment is conducted to determine whether the site warrants short- or long-term cleanup attention. At the conclusion of the assessment, a Hazard Ranking System (HRS) model is applied to derive a preliminary site score. Community involvement does not start at the PA and SI process because many sites assessed for inclusion on the NPL fall into other categories for

cleanup. However, it is a good opportunity to get to know your community. It is an opportunity to develop trust and credibility in the agency's ability to deal fairly and effectively with site issues.

Once the PA is complete, the PA report is made publicly available, and the federal agency determines whether to also require a site investigation. From there, EPA will decide whether the site should be proposed for the NPL. An initial EPA proposal to include a federal site on the NPL is reviewed by the Office of Management and Budget, which provides an opportunity for the responsible federal agency to provide input. Even at this stage, it is possible that the federal government may decide against addressing the contamination with an NPL listing. If EPA proposes the site for the NPL, the Agency follows the same listing process used for any site proposed for the NPL.

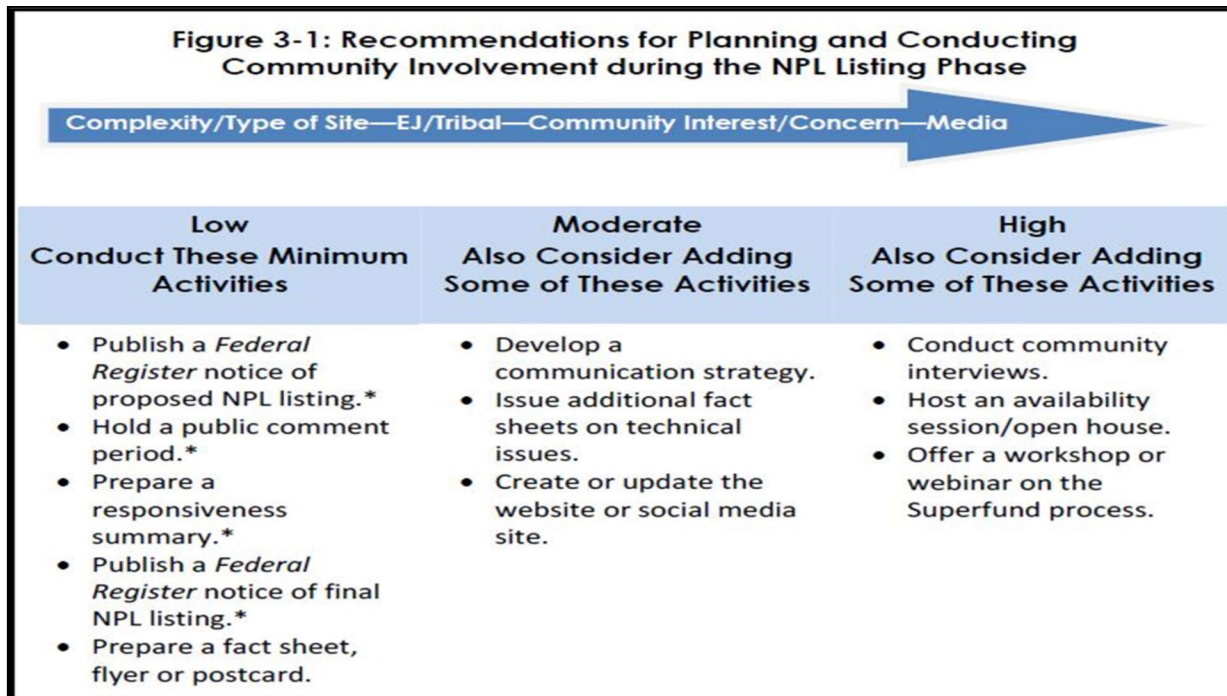
Cleanups at Federal Facilities, Previous Federal Agency Hazardous Waste Compliance Dockets  
<https://www.epa.gov/fedfac/previous-federal-agency-hazardous-waste-compliance-docket-updates>.

## NPL Listing CI Requirements

- ☐ Publish a proposed rule in to add a site to the NPL in the Federal Register and request public comments.
- ☐ Hold a public comment period of at least 30 days
- ☐ Prepare and publish a response to comments support document that addresses significant comments and any significant new data received during the public comment period.
- ☐ Publish a final NPL listing in the Federal Register.

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Adding a site to the NPL requires EPA to follow established rulemaking procedures. EPA must first publish a notice in the Federal Register proposing to add a site to the NPL and requesting public comments. EPA must consider and address all comments and make a final determination about whether to list the site. If the Agency decides to list the site, it must publish a final rule in the Federal Register. Typically, EPA adds new sites to the NPL twice each calendar year, usually in the spring and fall.



As an important first step, the site team should assess the situation to determine an appropriate mix of community involvement activities and plan an approach that addresses the needs of the community. In most cases, the site team should expect increased community concern or interest when a site is proposed for the NPL. While informing the public through a Federal Register notice is required, conducting additional activities to inform the community about the NPL listing process and how the public can submit comments may also be appropriate. Listing a site on the NPL also may attract media attention. Preparing a press release or using social media may be useful. The team should consider developing talking points for media interviews. This figure is taken from the 2016 Community Involvement Handbook.

# Removal Action Community Involvement

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Removal action activities community involvement requirements are slightly different than those for remedial actions, depending on the type and duration of the removal process

## Removal Actions

- ❑ Emergency Response
  - Action is **typically** required within hours
  - May not have enough time to issue an Action Memo (AM) before taking action
- ❑ Time-Critical Removal Action (TCRA)
  - Action is required within 6 months
  - Typically, an approved action memo (AM) is in place before initiating a non-emergency time-critical response
- ❑ Non-Time-Critical Removal Action (NTCRA)
  - Planning period of more than 6 months is available
  - Requires an Engineering Evaluation/Cost Analysis (EE/CA), or its equivalent, before AM is signed

Each type of  
removal action  
requires different  
levels of CI

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There are three types of removal actions: emergency response; time-critical; and non-time-critical responses.

- Emergency removals require an immediate response to releases or threatened releases to the environment. Emergency removals are initiated within hours or days of the determination that a removal action is appropriate.
- Time-critical removals are situations where a removal is appropriate and on-site removal activities must begin within six months.
- Non-time-critical removals are undertaken when a removal action is appropriate, and the situation allows for a planning period of at least six months before on-site activities must begin.



The Action Memo (AM) is the primary removal action document. It should document threats posed and actions taken for an emergency removal action and document threats posed and actions to be taken for a time-critical or non-time-critical removal action.

The NCP states that whenever a planning period of at least six months exists before on-site activities must be initiated, and the lead agency determines, based on a site evaluation, that a removal action is appropriate then the lead agency shall conduct an engineering evaluation/cost analysis (EE/CA) or its equivalent. (NCP 300.415(b)(4)(i)). During an EE/CA, data and removal alternatives for implementing a cost-effective removal response are evaluated.

## Community Involvement in Removal Actions

- Basic CI Actions for All Removals
  - Designate an agency spokesperson
  - Establish an administrative record
  - Inform the community about the administrative record (AR)
- All time-critical responses with a planning period of less than 6 months also require
  - Public comment period within 30 days of AR file being made available to public
  - Response to significant comments (include in AR)

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Note: These are responsibilities of the lead agency. EPA ensures these requirements are met.

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Emergency removals begin almost immediately, so there are no additional CI activities beyond the basic requirements, which are required for all removal actions:

- Designate an agency spokesperson
- Establish an administrative record
- Inform the community about the administrative record

Remember that quick and clear communication is key in explaining potential threats, how the community can protect themselves, and what measures are being taken.

Time-critical responses have longer planning periods than emergency removals, which means there is more time to plan community involvement activities. For time-critical removals, CI activities should include the basics above PLUS:

- Holding a public comment period, no less than 30 days from when the administrative record is available to the public.
- Preparing a responsiveness summary to respond to comments.

The Administrative Record is composed of documents that form the basis for selection of a response action that are usually made available in an Information Repository. It is the Federal Facility's responsibility to determine whether to provide this information in traditional form (i.e., paper copies or microfilm), electronically, or both. It would be helpful for interviews to assess the availability of computers in the community when determining what method to provide this information to the community.

## Community Involvement in Removal Actions

- ❑ Time-critical responses that last more than 120 days shall include:
  - Community interviews
  - Community involvement plan
  - Information repository
- ❑ Non-time-critical responses with a planning period of at least 6 months shall also include:
  - Public notice of availability of EE/CA
  - Public comment period (at least 30 days) on the EE/CA (can be extended by a minimum 15 days upon timely request)
  - Responsiveness summary to be included in the AR

Note: These are responsibilities of the lead agency. EPA ensures these requirements are met.

For time-critical responses expected to extend beyond 120 days, CI activities should include the basics PLUS:

- Conducting community interviews to determine how to involve the public in the removal process.
- Preparing a community involvement plan based on the community interviews.
- Establishing at least one information repository near the response location to provide the public with easier access to site-related documents.

Non-time-critical responses come with significantly more CI because more time is available to plan for the cleanup. For non-time-critical responses, CI activities should include the basics above PLUS:

- Publishing a public notice
- Holding a public comment period
- Preparing a responsiveness summary to respond to comments.

## Required Community Involvement Activities for Removal Actions

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Table 4-1: NCP Community Involvement Activities for Removal Actions				
Activity	Emergency Removal	Time-Critical Removal (Planning Period of Less than 6 Months)		Non-Time-Critical Removal Planning Period of More than 6 Months
		Short-Term On-site Activity Lasts Less than 120 days	Long-Term On-site Activity Lasts More than 120 days	
Designate Agency spokesperson to notify public and respond to questions.	✓	✓	✓	✓
Establish an administrative record.	✓	✓	✓	✓
Notify the public about the availability of the administrative record.	✓	✓	✓	✓
Hold a public comment period, if appropriate (required for EE/CA).	As appropriate	✓	✓	✓
Respond to public comments by preparing a responsiveness summary and put in administrative record file.	As appropriate	✓	✓	✓
Establish an information repository and inform the public of its availability.	N/A	N/A	✓	✓
Conduct community interviews.	N/A	N/A	✓	✓
Prepare a CI Plan.	As appropriate, when longer than 120 days	N/A	✓	✓
Notify the public about the availability of, and provide a brief description of the EE/CA.	N/A	N/A	N/A	✓

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The NCP addresses certain community involvement activities for each type of removal action, at specific points in the removal process (see Table 4-1 of the CI Handbook). However, as is true for all Superfund community involvement efforts, these activities should be a foundation upon which to plan and conduct a robust and effective community involvement strategy. The community involvement activities addressed in the NCP often will be sufficient to meet the needs of the affected community; however, on-scene coordinators (OSCs) and site teams should continually assess the situation to determine an appropriate mix of activities to fully engage the community.

Appendix A of the CI Handbook lists community involvement requirements for removal or remedial actions. Response actions necessary to achieve short term strategic objectives are generally identified as time-critical removal actions, and activities necessary to achieve mid-term strategic objectives are generally identified as non-time critical removal actions. Note that these required activities serve as the foundation for planning community involvement at Superfund sites. EPA policy encourages and promotes the implementation of additional community involvement activities that are not required by the NCP but are needed to fully engage the community. EPA focuses on developing and implementing a community involvement approach based on what is needed to engage the community, not just what is required. EPA views the NCP requirements as a starting point rather than an end point.

## Test Your Understanding

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True or False:

- ☐ A removal is time-critical when a site evaluation has been conducted and it is determined that there is not an immediate emergency, but on-site removal activity must begin within six months

## Test Your Understanding

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What two CI activities are required when a Removal action on-site activity takes **less** than 120 days?

- A. Complete a CI Plan
- B. Establish an Administrative Record
- C. Notify the public about the availability of the Administrative Record
- D. Establish an Information Repository
- E. Conduct a community interviews

## Test Your Understanding

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Which activities are required when a Removal action on-site activity takes **more** than 120 days?

- A. Complete a communications plan
- B. Establish an Administrative Record
- C. Notify the public about the availability of the Administrative Record
- D. Establish an Information Repository
- E. Conduct a community interviews

## Test Your Understanding

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Which activities are required for a non-time critical removal action with a planning period of **more than 6 months**?

- A. Respond to public comments in a responsiveness summary
- B. Establish an Administrative Record
- C. Hold a public meeting
- D. Hold a public comment period
- E. Conduct a community interviews

# Remedial Action Community Involvement

## Community Involvement Requirements Before RI Field Activities

- ☐ Conduct community interviews
- ☐ Prepare a formal CIP
- ☐ Establish a local information repository at or near the site
- ☐ Establish the administrative record file and make it available as a part of the information repository
- ☐ Publish a public notice in a newspaper of major local circulation or use one or more other mechanisms to give adequate notice



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Once a Federal Facility is listed on the National Priorities List (NPL), the site enters the Superfund process. The NCP requires specific community involvement activities at certain points throughout the Superfund process. Activities necessary to achieve long term strategic objectives are generally referred to as remedial actions.

Consistent with the NCP, the lead cleanup agency should conduct the following community involvement activities prior to the initiation of RI field activities:

- Conduct community interviews to solicit people's concerns and determine how and when people want to be involved.
- Prepare a formal CIP to specify outreach activities that the Agency expects to undertake.
- Establish and maintain a local information repository at or near the location of the site.



- Establish the administrative record file and make it available to the public as a part of the information repository.
- Publish a public notice to announce the availability of the administrative record for the selection of a remedial action in a newspaper of major local circulation or use one or more other mechanisms to give adequate notice to the public of the availability of the administrative record file.
- Inform the community of the availability of a TAG.

## Public Notice in Newspapers

- Public notices in newspapers of general circulation are needed for:
  - Proposed listing of the site on the NPL
  - Availability of the administrative record file and Information Repository location for remedial actions.
  - Availability and brief analysis of the Proposed Plan
  - Issuance of ROD
  - Issuance of ESD
  - Proposed Plan for ROD Amendment

Some public notices are required to be published in a newspaper of general circulation. Changes were made to the NCP in 2015 to allow adequate notice to a community via a major local newspaper of general circulation or by using other mechanisms.

## Public Notice By Other Mechanisms

- Public notices in major newspapers or by other mechanisms for notifying the public of:
  - Availability of AR files pertaining to time-critical actions;
  - Availability of EE/CA for a NTCRA
  - NPL deletions
  - Availability of AR at the commencement of the remedial investigation
  - Availability of AR when an EE/CA for a NTCRA is issued for public comment
  - Notification of AR for all other removal actions not included in Section 300.820(a).

Other mechanisms include distributing flyers door-to-door, mailing notices to homes, sending email notifications, making telephone calls, or posting on Web sites.

In an NCP amendment, effective May 4, 2015, EPA added language to the NCP to broaden the methods by which the EPA can notify the public about certain Superfund activities.


The rule expands the public notice language in six sections of the NCP to allow adequate notice to a community via a major local newspaper of general circulation or by using one or more other mechanisms for:

- A notice of the availability of the administrative record file for CERCLA actions where, based on a site evaluation, the lead agency determines that a removal action is appropriate, and that less than six months exists before on-site removal action must begin.
- Notification of the engineering evaluation/cost analysis (EE/CA) where the lead agency determines that a CERCLA removal action is appropriate and that a planning period of at least six months exists prior to initiation of the on-site removal activities.
- Notification of releases that may be deleted from the NPL.
- Notification of the availability of the administrative record file for the selection of a remedial action at the commencement of the remedial investigation.
- Notification of the availability of the administrative record file when an EE/CA is made available for public comment, if the lead agency determines that a removal action is appropriate and that a planning period of at least six months exists before on-site removal activities must be initiated.
- Notification of the availability of the administrative record file for all other removal actions not included in § 300.820(a).

Federal Register, May 4, 2015;

<https://www.federalregister.gov/documents/2015/04/02/2015-07474/national-oil-and-hazardous-substances-pollution-contingency-plan-ncp-amending-the-ncp-for-public>

**Figure 3-2: Recommended Activities for Planning and Conducting Community Involvement during RI/FS**

Complexity/Type of Site—EJ/Tribal—Community Interest/Concern—Media Interest 		
Low Conduct These Minimum Activities	Moderate Also Consider Adding Some of These Activities	High Also Consider Adding Some of These Activities
<ul style="list-style-type: none"> <li>• Conduct community interviews.*</li> <li>• <b>Prepare a CIP.*</b></li> <li>• Establish the local information repository.*</li> <li>• Establish the administrative record.*</li> <li>• Issue a public notice about local information repository and administrative record.*</li> <li>• Advertise availability of the TAG.*</li> <li>• Distribute a fact sheet about the site and Superfund process.</li> <li>• Create a website, Facebook page, or social media site.</li> </ul>	<ul style="list-style-type: none"> <li>• Prepare communication strategies, as needed.</li> <li>• Conduct outreach to explain risk assessment guidelines and processes.</li> <li>• Make presentations to community groups in person or via conference call, Adobe Connect, or other Agency meeting or webinar tools.</li> <li>• Host an availability session/open house.</li> <li>• Prepare fact sheets on technical or enforcement issues.</li> <li>• Offer a workshop or webinar on the Superfund process.</li> <li>• Use telephone hotlines.</li> <li>• Host site tours.</li> </ul>	<ul style="list-style-type: none"> <li>• Work with the Community Advisory Group.</li> <li>• Conduct a TANA and offer technical assistance, if appropriate.</li> <li>• Offer community visioning for site reuse.</li> </ul>

Keep in mind that the needs of a community at a site can change. A site may be of low to moderate interest to a community, but due to emerging issues may change to a higher level of interest. That higher level of interest may require more community involvement. This figure is taken from the 2016 Community Involvement Handbook.

## Community Involvement Requirements for the Proposed Plan and ROD

- ☐ Publish a public notice in a newspaper
- ☐ Make the Proposed Plan and supporting information available to the public (AR and information repository)
- ☐ Provide a 30 day public comment period
  - extend the period by at least 30 days, if appropriate.
- ☐ Provide the opportunity for a public meeting during the public comment period at or near the site.
  - Prepare a transcript and make available to the public
- ☐ Prepare a “Responsiveness summary” (included in the ROD)
- ☐ Publish notice of availability of the ROD in a newspaper

The lead cleanup agency should conduct the following community involvement activities:

- Prepare a Proposed Plan of the action EPA proposes to take to remediate the site. Publish a public notice in a major local newspaper of general circulation to publicize the availability of the Proposed Plan and RI/FS, provide a brief summary of the Proposed Plan, and announce a public comment period.
- Make the Proposed Plan and any supporting analysis and information available to the public in the administrative record and information repository.
- Provide a public comment period (not less than 30 days) for the public to submit comments, and extend the period by at least 30 days, if appropriate.
- Provide the opportunity for a public meeting to be held during the public comment period at or near the site at issue regarding the proposed plan and the supporting analysis and information. Prepare a transcript of all formal public meetings held during the public comment period and place the transcripts in the administrative record and information repository.
- Prepare a written response to significant comments submitted during the public comment period. This “responsiveness summary” is included in the ROD.

During the Proposed Plan phase of the remedial process, the site team is encouraged to maintain communication with public officials and interested community members, explain the remedial alternatives in understandable terms, and solicit public input. Effective community involvement and careful consideration of suggestions and comments submitted by concerned community groups and other inhabitants will showcase that the site team is serious about considering the community’s input.

**Figure 3-3: Recommendations for Community Involvement during the RI/FS Completion and the Proposed Plan**



<b>Low</b> <b>Conduct These Minimum Activities</b>	<b>Moderate</b> <b>Also Consider Adding Some of These Activities</b>	<b>High</b> <b>Also Consider Adding Some of These Activities</b>
<ul style="list-style-type: none"> <li>• Prepare a Proposed Plan.*</li> <li>• Post a notice of the Proposed Plan.*</li> <li>• Hold a public meeting and prepare a meeting transcript.*</li> <li>• Hold a public comment period.*</li> <li>• Prepare a responsiveness summary.*</li> <li>• Issue a press release.</li> <li>• Distribute a flyer.</li> <li>• Make the EPA citizen’s guides to cleanup technologies available.</li> </ul>	<ul style="list-style-type: none"> <li>• Prepare a fact sheet summarizing the Proposed Plan.</li> <li>• Conduct informal activities.</li> <li>• Host an availability session/open house.</li> <li>• Prepare additional fact sheets on technical issues.</li> <li>• Make presentations to community groups in person or via conference call, Adobe Connect, or other Agency meeting or webinar tools.</li> <li>• Offer a workshop or webinar on the Superfund process.</li> <li>• Create or update the website or social media site.</li> <li>• Prepare communication strategies as needed.</li> </ul>	<ul style="list-style-type: none"> <li>• Conduct focus groups.</li> <li>• Form or work with an existing Community Advisory Group.</li> <li>• Offer alternative dispute resolution services.</li> <li>• Conduct a TANA and, if appropriate, provide technical assistance.</li> </ul>

Note that the lead agency must provide the opportunity for a public meeting to be held during the public comment period at or near the site. This can be done by including language in the proposed plan and fact sheet (if applicable) that states the public can request a public meeting by contacting the federal agency. If significant interest in a public meeting is demonstrated, the site team can then plan a public meeting in response to public interest. If it is known or anticipated that there will be a high level of interest, the site team can plan for the public meeting in advance and announce it in conjunction with the public comment period and notice of Proposed Plan availability. This figure is taken from the 2016 Community Involvement Handbook.

## Test Your Understanding

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True or False:

- ☐ At a minimum, a **30** day public comment period is required on a Proposed Plan.
- ☐ Upon timely request, the lead agency will extend the public comment period by a minimum of 30 additional days

## Test Your Understanding

These are conducted to gather information for a Community Involvement Plan (CIP) and serve as a way to meet with community members and learn about their site-related needs, concerns, and expectations, as well as how the community gets information and prefers to receive site-related information.

- A. Action Memo
- B. Public Meeting
- C. Press Release
- D. Proposed Plan
- E. Community Interviews

## Test Your Understanding

A \_\_\_\_\_ of a public meeting held during a proposed plan public comment period must be kept and made available to the public.

- A. Transcript
- B. Video Recording
- C. Photo Log
- D. Sign-In Sheet
- E. Audio Recording

## Test Your Understanding

The lead agency must publish a \_\_\_\_\_ for the following events:

- A site is proposed to be added/deleted from NPL
- The Administrative Record and Information Repository become available
- The public comment period on the Proposed Plan is held
- The remedial alternative has been selected and the ROD signed

- A. Responsiveness Summary
- B. Fact Sheet
- C. Action Memo
- D. Public Notice
- E. Proposed Plan




## Community Involvement for Changes Post-ROD


- ❑ Changes significantly affecting the remedy selected in the ROD will need more explanation and opportunity for public comment than others
- ❑ Post-ROD changes are documented by the following:
  - **Insignificant or minor change** recorded in the project file
  - **Significant change** through an Explanation of Significant Differences (ESD)
  - **Fundamental change** which requires a ROD Amendment

Generally, there are three types of ROD changes, each potentially with its own type of documentation and community involvement steps:

- Non-significant or minor changes may affect things such as the type or cost of materials, equipment, facilities, services, and supplies used to implement the remedy. The change will not have a significant impact on the scope, performance or cost of the remedy. These changes should be recorded in the project file.
- Significant changes generally involve a change to a component of a remedy that does not fundamentally alter the overall cleanup approach. After adoption of a ROD, CERCLA requires an explanation of significant differences (ESD) if a remedial action, enforcement action under CERCLA, or any settlement or consent decree differs significantly from the ROD.
- Fundamental changes involve an appreciable change or changes in the scope, performance, and/or cost, or multiple significant changes that together have the effect of a fundamental change to the ROD. When fundamental changes are made to the ROD, a Proposed Plan for the amended ROD that highlights the proposed changes must be issued. An amended ROD that documents the changes follows the Proposed Plan. When this occurs, the community involvement requirements are similar to those required for the initial Proposed Plan.



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## Community Involvement Requirements for ESD

- ☐ Issue an ESD
- ☐ Make the ESD and supporting information available in the administrative record and information repository
- ☐ Publish a public notice in a major local newspaper of general circulation

A site team can chose to go beyond the required community involvement.

**Non-significant or Minor Changes:** There are no statutory requirements or NCP provisions addressing community involvement when minor changes are made to the ROD.

**Significant changes/ESD Requirements:**

- Issue an ESD that describes to the public the nature of the significant changes, summarizes the information that led to making the changes, and affirms that the revised remedy complies with statutory and regulatory requirements.
- Make the ESD and supporting information available to the public in the administrative record and information repository.
- Publish a public notice in a major local newspaper of general circulation that briefly summarizes the significant differences and states the reasons for the changes.

## Community Involvement Requirements for ROD Amendments

- ☐ Publish a notice of the availability in a major local newspaper of general circulation
- ☐ Hold a public comment period of at least 30 days on the Proposed Plan to amend the ROD,
  - Extend by a minimum of 30 days upon timely request
- ☐ Provide the opportunity for a public meeting during the comment period
- ☐ Keep a transcript of the public meeting
- ☐ Prepare a written response to comments
  - this summary should be included in the amended ROD.
- ☐ Publish notice of availability of the amended ROD



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Similar to ROD CI Process

Fundamental changes/ROD amendment: Consistent with CERCLA, the NCP and existing EPA CERCLA guidance, the lead cleanup agency should:

- Publish a notice of the availability of the ROD amendment and a brief description of the proposed amendment in a major local newspaper of general circulation.
- Hold a public comment period of at least 30 days for the submission of comments on the Proposed Plan to amend the ROD and extend the period by a minimum of 30 days upon timely request.
- Provide the opportunity for a public meeting during the comment period.
- Keep a transcript of comments received during the public meeting.
- Prepare a written response to comments (responsiveness summary) that includes a brief explanation of the Proposed ROD amendment and a response to each of the significant comments, criticisms, and new relevant information received during the comment period. Consistent with the NCP, this summary should be included in the amended ROD.

A final decision on whether to amend the ROD generally is made only after consideration of public comments. If the lead cleanup agency and EPA decide to formally amend the ROD, the lead cleanup agency should take the following steps consistent with CERCLA, the NCP, and existing EPA CERCLA guidance:

- Publish a notice of the availability of the amended ROD in a major local newspaper of general circulation.
- Make the amended ROD and supporting information available in the administrative record and information repository before the remedial action begins.

Figure 3-5: Recommendations for Planning and Conducting Community Involvement for Post-ROD Changes

Community Concern—Media—EJ/Tribal—Potential Controversy/Disruption		
Low Conduct These Minimum Activities	Moderate Also Consider Adding Some of These Activities	High Also Consider Adding Some of These Activities
<p><b>For Minor Changes</b></p> <ul style="list-style-type: none"> <li>• Issue a fact sheet.</li> <li>• Issue an email or Web announcement.</li> <li>• Update the website or social media site.</li> </ul> <p><b>For Significant Changes</b></p> <ul style="list-style-type: none"> <li>• Issue an ESD.*</li> <li>• Make the ESD available in the administrative record/information repository.*</li> <li>• Publish a notice.*</li> </ul> <p><b>For ROD Amendment</b></p> <ul style="list-style-type: none"> <li>• Publish a public notice.*</li> <li>• Hold a public comment period.*</li> <li>• Conduct a public meeting and prepare a transcript.*</li> <li>• Publish a responsiveness summary.*</li> </ul> <p><b>After ROD Is Amended</b></p> <ul style="list-style-type: none"> <li>• Publish a notice of amended ROD availability.*</li> <li>• Make the amended ROD available to the public in the administrative record and information repository.*</li> <li>• Prepare a fact sheet summarizing significant changes.</li> <li>• Issue a press release.</li> </ul>	<ul style="list-style-type: none"> <li>• Prepare a communications strategy if necessary.</li> <li>• Conduct informal activities.</li> <li>• Host a conference-call meeting with members of the community.</li> <li>• Hold an availability session/open house.</li> <li>• Issue additional fact sheets on ROD changes.</li> <li>• Make presentations to community groups in person or via conference call, Adobe Connect, or other Agency meeting or webinar tools.</li> <li>• Offer a site tour or virtual site tour.</li> <li>• Hold meetings in person or by teleconference or webinar to explain the ROD.</li> </ul>	<ul style="list-style-type: none"> <li>• Conduct or update the TANA and if appropriate provide or continue to provide technical assistance.</li> <li>• Form or work with a CAG.</li> <li>• Hold focus groups.</li> <li>• Offer ADR services through CPRC, if appropriate.</li> </ul>

Changes that significantly or fundamentally affect the remedy selected in the ROD typically involve more explanation and enhanced community involvement. This figure is taken from the 2016 Community Involvement Handbook.

## Five-Year Reviews and the Community



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- Why they are important to the community
  - Federal facility cleanups are long-term efforts
  - Way to communicate with and update the public on cleanups
- Informing the Community
  - Public should be informed when the document is available
- Involving the Community
  - Consider community interviews as part of five-year reviews
  - Five-Year reviews provide an opportunity to identify and address concerns

Section 121 of CERCLA requires remedial actions that result in any hazardous substances, pollutants, or contaminants remaining at the site be subject to a Five-Year Review. The purpose of the five-year review is to evaluate the implementation and performance of the remedy in order to determine whether the remedy is or will be protective of human health and the environment. For federal facility sites, the lead agency conducts the review, prepares the reports, and submits the report to EPA for review and comment. The lead agency is responsible for ensuring that the recommendations and follow-up actions in the report are completed. No community involvement activities during operation and maintenance (O&M) or the five-year review are mandated in CERCLA or addressed in the NCP.

Five Year Reviews undertaken by the lead federal agency should include notifying the community that the review will be conducted; requesting information from the community about the site, if appropriate; notifying the community that the review (including a determination of whether the selected remedy is protective) has been completed; and, preparing a summary of the review and making it available at the local repository and/or on a webpage. The Five-Year Review period is a good time to assess the level of CI. (EPA CI Handbook, page 58)

2011 EPA Guidance on FYRs

- Notify the community the review will be conducted
- Notify the community when the review has been completed
- Make the report available to the public

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EPA United States Environmental Protection Agency

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Cleanups at Federal Facilities

Home FEDFacts Base Realignment and Closure (BRAC) Emerging Contaminants and Contaminants of Concern Federal Agency Hazardous Waste Compliance Docket Military Munitions and Unexploded Ordnance (UXO) Quality Assurance

Five-Year Review of Federal Facility Cleanups

Overview Training & Tools FYR Information

Community Tools

The Federal Workgroup on Five-Year Reviews (FYR) developed these training tools to help site managers at federal facilities communicate with community members about the purpose and process of five-year reviews. Use of these materials is not required at any site; they are tools you may use and adapt as appropriate to meet your site-specific needs. When you use these, please add any information specific to your site, such as contact information.

Training and Tools available at <https://www.epa.gov/fedfac/five-year-review-federal-facility-cleanups>

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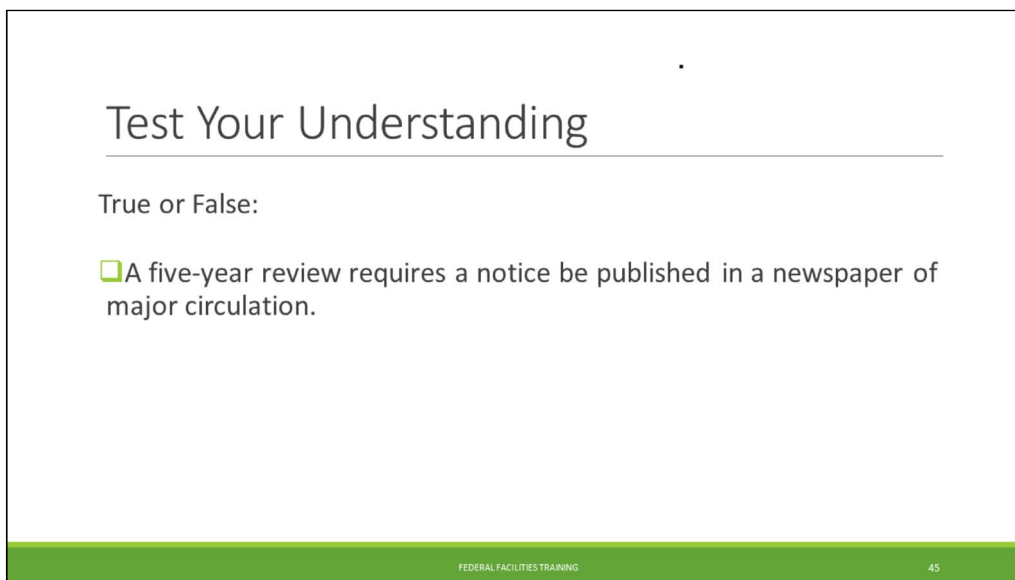
The EPA 2001 Comprehensive Five-Year Review Guidance provides the policies and procedures for conducting five-year reviews at Superfund sites.

(<https://semspub.epa.gov/work/HQ/128607.pdf>)

The 2001 guidance states that the site team should consider conducting additional community involvement activities at high profile sites, those with significant public interest, and any other sites for which there is a need for additional community involvement activities. This may include notifying local public officials, including the primary local health agency, and the leadership of any relevant neighborhood and civic groups. In addition to this notification, you may also wish to interview several community members, at least some of whom live or work near the site, to get their views about current site conditions, problems, or related concerns. If there was or is a citizens advisory group, representatives of these groups should be briefed at the outset of the five-year review process, and, if requested, at other appropriate points. You may also want to consider appropriate ways, such as public meetings or an opportunity for

submitting written comments, to get broader public involvement.

More information on Federal Facility Five-Year Reviews is available at <https://www.epa.gov/fedfac/five-year-review-federal-facility-cleanups>.



Test Your Understanding

True or False:

☐ A five-year review requires a notice be published in a newspaper of major circulation.

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Many effective methods for notifying the community about five-year reviews include: posting information and reports on the site's webpage or social media site; disseminating reports; distributing postcards, fact sheets, and flyers via mail, email, social media, or at events; issuing press releases; and, placing advertisements in local newspapers, community newspapers, or newsletters. EPA 2016 CI Handbook, pages 60-61



The Superfund Community Involvement Handbook and Toolkit describes over 40 techniques

Communication Tools

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Community involvement planning involves both short- and long-term strategies. EPA has a Community Involvement Tool for Communication Strategies at <https://semspub.epa.gov/work/HQ/100002214.pdf> .

A Community Involvement Plan, or CIP, is the backbone of the community involvement process and serves as a useful reference for the site team during the remedial process or long-term emergency response. This document addresses how general outreach activities will be undertaken for a long-term project or activity.

A communication strategy is a short-term plan for providing information to specific audiences about a specific issue, event, or concern. It is a blueprint for addressing a specific problem or issue and emphasizes three critical components: message (what), audience (who), and delivery (how). Short-term strategies are limited to only those elements necessary for communicating efficiently and effectively. A communication strategy can be one component of a CIP, but it addresses only a specific event, issue, or concern, such as an emergency response to a release, or communicating the specific risk at a site.

## Major Components of the Community Involvement Plan

- Living document required by the National Contingency Plan (NCP)
  - Important to update as needed to stay current
- The Community Involvement Plan (CIP)
  - Describes the site
  - Includes a community profile
  - Identifies community needs and concerns
  - Specifies site action plan
  - Allows for community comment

The CIP should be a living document and is most effective when it is updated or revised as site conditions change. The CIP:

- Describes the site, including relevant history, type and extent of contamination, and environmental exposures and concerns.
- Includes a comprehensive Community Profile, including a summary of demographic information and other important characteristics of the affected community which may be obtained from the EJ Screen.
- Identifies key community needs, concerns, and questions, as well as expectations. This information is typically collected through Community Interviews and depicted in the Community Profile.
- Specifies planned outreach activities or action plan. The plan includes a projected sequence of project milestones tied to site activities (with projected timeframes, whenever possible) and the mechanisms that will be used to communicate with the public.
- Allows for community comment on the draft CIP and describes the mechanisms used to receive and consider feedback before issuing the “final” CIP (e.g., formal or informal public comments, community meetings, public meeting, etc.)

Refer to the CIP tool in the community involvement toolkit for additional components and information on the CIP at <https://semspub.epa.gov/work/HQ/100002210.pdf>.

# Community Involvement at Federal Facilities Federal Facilities Academy

Communication tools include social media, fact sheets, public notices, and mailing lists.

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Another way is to share information through social media, fact sheets, public notices, and mailing lists. Refer the community involvement toolkit for additional information.

- Social Media tool: <https://semspub.epa.gov/work/HQ/100001966.pdf>
- Fact Sheet tool: <https://semspub.epa.gov/work/HQ/199509.pdf>
- Public Notices tool: <https://semspub.epa.gov/work/HQ/100002122.pdf>
- Mailing Lists tool: <https://semspub.epa.gov/work/HQ/100002219.pdf>

## EJSCREEN

EJSCREEN mapping and screening tool may assist with:

- Identifying areas that meet demographic indicators for potential susceptibility
- Potential environmental quality issues
- Identifying a combination of environmental and demographic indicators that is greater than usual
- Translator services
- Other factors that may be of interest

EJScreen for Ozone passed on National Percentiles

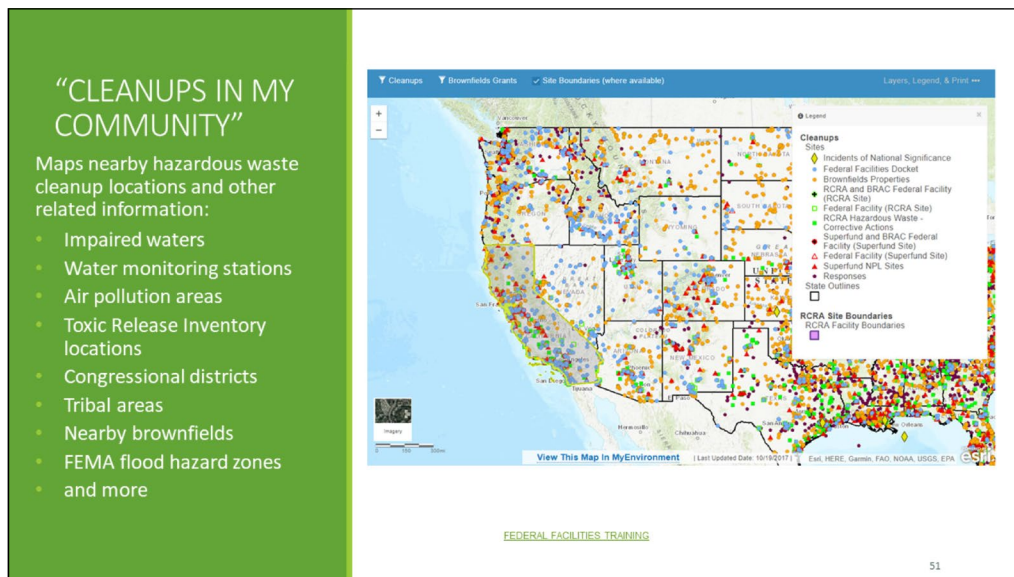
<https://www.epa.gov/ejscreen>

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Community involvement is all about understanding and listening to the people in the community. EPA has developed some very useful tools that provide insight and understanding into the community surrounding your site that factor into a well-developed Community Involvement Program. These tools help you in identifying community groups and community leaders who serve as community spokespeople.

EPA's approach to community involvement evolved through an increased focus on environmental justice (EJ). The EPA's definition of EJ is "The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies" (CI handbook January 2016, p 3).

EPA developed the EJSCREEN as a preliminary step when considering environmental justice in certain situations. It is used to screen for areas that may be candidates for additional consideration, analysis or outreach as EPA develops programs, and policies and activities that may affect communities. The EJSCREEN allows users to access high-resolution environmental and demographic information for locations in the United States and compare their selected locations to the rest of the state, EPA region and the nation. Demographic data originates from the U.S. Census Bureau, American Community Survey, and the Environmental Indicator data originates from EPA's National Air Toxics Assessment, RCRAinfo database, and several other reliable EPA and Dept. of Transportation databases.

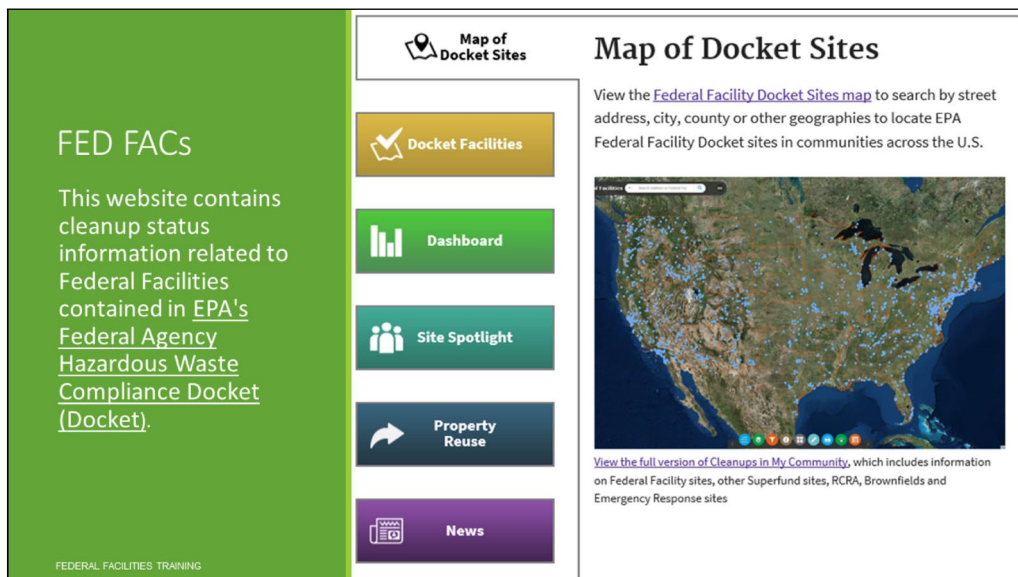


Community Involvement at Federal Facilities  
Federal Facilities Academy

EPA's "Cleanups in My Community" tool is helpful in becoming familiar with RCRA, Brownfields properties, other Superfund Sites, and BRAC bases in the locality of your site. Use of this tool may help in tapping into environmental advocate groups, neighborhood alliances, and other coalitions that may share insight and experience in distributing information and developing collaborative efforts. To use "Cleanups in My Community", first select your state on the map. Then you will see an option to identify your community, either by street address, latitude, longitude, zip code, etc. Additional layers on this map include: Toxic Release Inventory Systems, FEMA Flood Hazards, Tribal Areas, and Air Non- Attainment areas.

This tool provides:

- Help in searching for local environmental advocate groups.
- Help in identifying neighborhood alliances by Googling the names of nearby cleanups.
- Insight into siting residential and sensitive population facilities
- Insight into siting water treatment facilities
- Help in identifying tribal interests.



This website contains cleanup status information related to Federal Facilities contained in [EPA's Federal Agency Hazardous Waste Compliance Docket \(Docket\)](https://www.epa.gov/fedfac/fedfacts). Section 120(c) of CERCLA requires EPA to establish a Docket which contains information reported to EPA by federal facilities that manage hazardous waste or from which hazardous substances, pollutants or contaminants have been or may be released. The Docket Facilities tab provides a list of NPLS sites, Non-NPL sites, Base Realignment and Closure Act (BRAC) sites, and Resource Conservation and Recovery Act (RCRA) sites. The Dashboard tab displays interactive charts and graphs related to the Docket. Available at <https://www.epa.gov/fedfac/fedfacts>.

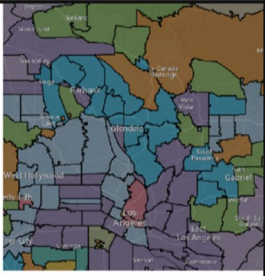


### Explore Your Community's Characteristics

Think you know everything about your neighborhood? Let's find out!

Enter a ZIP Code and pick some topics to see what the power of location can reveal about any place in the US. Explore up to 10 different consumer spending, demographic, lifestyle, and behavioral trends and tap into spatial analytics to see your neighborhood like never before.

[Start Exploring](#)



## Tapestry (ArcGIS Tool)

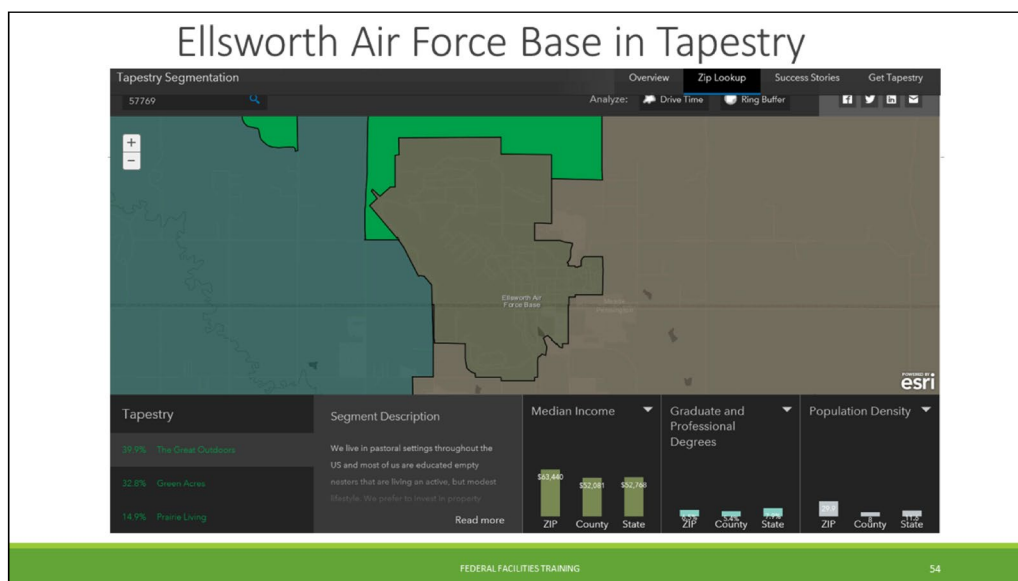
Useful for viewing demographic data based on zip code around a site

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Tapestry is a geodemographic segmentation system that integrates consumer traits with residential characteristics to identify markets and classify US neighborhoods. Neighborhoods with the most similar characteristics are grouped together, while neighborhoods with divergent characteristics are separated. Internally homogenous, externally heterogeneous market segments depict consumers' lifestyles and lifestages. Tapestry Segmentation combines the "who" of lifestyle demography with the "where" of local geography to create a classification model with 67 distinct, behavioral market segments.

Use of a tool such as this one may be helpful in better understanding a community's characteristics and needs. Enter the zip code of interest to get a map of segments that characterize the neighborhood: <https://www.esri.com/en-us/arcgis/products/tapestry-segmentation/zip-lookup>.



Here is an example of the type of information provided in the Tapestry ArcGIS tool.





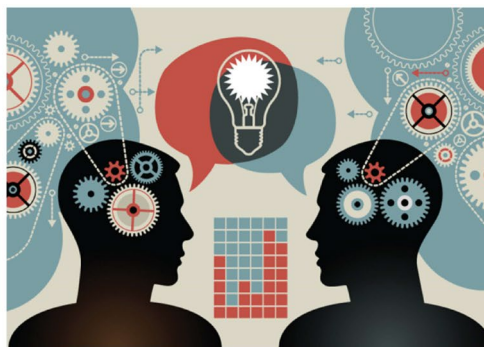
At complex sites or where there is strong community interest or EJ concerns, the lead federal agency should consider assessing the community's need for technical assistance through the Technical Assistance Needs Assessment (TANA). The TANA is a site-specific process that identifies whether a community requires additional support from EPA to understand technical information and to enable meaningful community involvement in the Superfund decision-making process. The benefit of the TANA is that it helps determine whether the advisory group is best served by a TAG, TASC, or TAP.

- TAGs provide funding to community groups to contract their own technical advisor to interpret and explain technical reports, site conditions, and EPA's proposed cleanup proposals and decisions. An initial grant up to \$50,000 is available to qualified community groups.
- TASCs provide independent assistance through an EPA contract to help communities better understand the science, regulations and policies of environmental issues and EPA actions. Under the TASC contract, a contractor provides scientists, engineers and other professionals to review and explain information to communities on a project-specific basis and provided at no cost to communities.
- TAPPs provide funds to small businesses to conduct independent technical analyses for community members of RABs on topics of concern at DoD environmental restoration sites. Up to \$25,000 per year and a total of \$100,000 per DoD installation is available.

More information at <https://www.epa.gov/superfund/superfund-technical-assistance-communities>.

## Group Poll

What are some of the steps you would take to produce a successful CI Program at your Federal Facility site?



## In Review

- Community involvement plays a significant role in Superfund
- Communication and coordination across the site team is necessary for an effective community involvement program
- Often a site team will need to go beyond regulatory requirements to meet the intent of community involvement under CERCLA and the NCP



## Contact Information

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# Open House Meeting

Lisa M. Cunningham,  
Remedial Project Manager, Region 3

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FORMER NAVAL AIR STATION JOINT RESERVE BASE, WILLOW GROVE  
&  
FORMER NAVAL AIR WARFARE CENTER, WARMINSTER

## Background

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- ☐ Municipal wells were required to be sampled for an emerging contaminant (PFAS) and it found above the provisional Health Advisory (pHA).
- ☐ Hundreds of private wells in 3 communities were sampled and a significant number exceeded the pHA.
- ☐ An Open House was held to inform/educate the public.

## Why an Open House Format

- Allows the public to communicate with the experts “One on One.”
- Prevents “Grand Standing”.
- Allows the public to get only the information they are interested in.



## Who made this Open House a success?

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- Horsham Township
  - Fire Department
  - Police Department
- Warrington Township
- Warminster Township
- PA Department of Health
- Department of the Navy
- Air National Guard
- EPA
- ATSDR

## Risk Communication Skills

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The Navy and Marine Corps Public Health Center put on a two day training which included:

- What to say and what not to say
- What facial expressions mean
- Words not to use
- Role Playing
- Poster Boards development

## Poster Boards/Stations

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### **NAVAL AIR WARFARE CENTER WARMINSTER**

- Warrington Township Water & Sewer Dept
- Warminster Township Municipal Authority
- Private Well Sampling
- Former NAWC Warminster PFAS Timeline
- Base History & Enviro. Cleanup NAWC

### **NAVAL AIR STATION JOINT RESERVE BASE Willow Grove**

- Horsham Water & Sewer Authority
- Private Well Sampling
- Former NAS JRB Willow Grove PFAS Timeline
- Base History & Enviro. Cleanup NAS JRB

## Shared Poster Stations

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- PFOA & PFAS Health Effects
- PFOS & PFAS Unregulated Contaminants
- PFOA & PFAS Perfluorinated Compounds



Community Involvement at Federal Facilities  
Federal Facilities Academy



**Open House Meeting for the Willow Grove and Warminster Site Address Perfluorootanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS) in the Residential Drinking Water Wells.** Over 1200 people including eighty five residents attended the February 24, 2015 session (4 to 7 PM), and over 800 people including 67 residents attended the February 25, 2015 session (11 AM to 2 PM). The purpose of the sessions “Actions to Address Impacts to Drinking Water” were to continue informing and educating the public about the Perfluorinated Compounds (PFCs) coming from the Former Naval Air Station Joint Reserve Base Willow Grove and the Former Naval Air Warfare Center in Warminster. At the meeting residents were scheduled for private well sampling. Representatives from EPA, the Navy, ATSDR, County Health Departments, municipal water authorities, and local townships were available to answer the resident's questions and concerns. Staff members from the offices of Congressman Brendan Boyle, Congressman Mike Fitzpatrick’s, and PA State Representative Todd Stephens also attended a session. The newspapers the Inquirer and the Intelligencer were present and published articles regarding this meeting.

## Summary

- ☐ It wasn't luck that this Open House was a success.
- ☐ It took several weeks of preparation, meetings and rehearsals.
- ☐ All of the poster boards, Fact Sheets and other handouts were preapproved.
- ☐ Only the people who came to the training could speak to the public and only on the topic they were assigned.