



Community Relations Plan

Eureka, Nevada
Smelter Site
January 2015



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Introduction

This plan outlines how the United States Environmental Protection Agency (EPA) and the Nevada Division of Environmental Protection (NDEP) will communicate with residents and interested parties in Eureka regarding the cleanup of the former smelter sites and contaminated properties in town. By working with the community, the goal of EPA and NDEP is to listen to and incorporate community preferences and concerns into the cleanup process. In an effort to develop a more complete understanding of the community, EPA interviewed a variety of residents on site cleanup work. Their responses have been compiled to inform this community relations plan.

Purpose of Plan

The purpose of this plan is to ensure the community members of the town site of Eureka are kept fully informed throughout the cleanup process. The public will have opportunities to provide input and comment on proposed actions. It is essential that human health, especially the health of children, remains highest priority and that all measures to protect health are taken.

History of the Project

The town of Eureka is located on Highway 50 in the central part of Nevada. Eureka is considered the birthplace of silver-lead smelting in the United States. Eureka's boom years lasted from 1870-1885. A map of Eureka dated 1873 shows the locations of seven smelter sites and two mill sites within what is now the downtown area. By 1878, 17 furnaces in eight smelters were operating. In 1890 and 1891, the largest smelters closed due to falling silver prices and the remaining then merged in 1906. Smelting had largely stopped by 1910. Ore processing and smelting activities produced slag waste material containing lead and arsenic. Smelter fumes emitted from furnace stacks also contained lead and arsenic that were deposited downwind. After smelting operations ceased, the additional transport of lead and arsenic to other parts of town likely occurred as a result of wind, water and human redistribution of byproducts from the smelting process.

EPA and NDEP are currently investigating lead and arsenic soil contamination in Eureka. On May 4, 2012, NDEP requested EPA assistance and in October 2012, EPA and NDEP conducted soil sampling at more than 100 properties

and at Eureka public schools. All soil sampling and cleanup work in Eureka has been performed on a voluntary bases, agreed to by property owners and completed at no charge to individual property owners or the county. The results of this sampling effort were communicated to individual property owners in January 2013 and a report summarizing the sampling results was released in March 2013. A copy of this report is available at the Eureka Public Library and on EPA and NDEP's websites (found at the end of this document). In May 2013, EPA and NDEP conducted soil sampling at 19 additional properties in Eureka. Results from sampling showed at least 20 properties with soil levels exceeding 3000 ppm lead and 600 ppm arsenic. EPA generally considers soil concentrations of less than 400 ppm lead and 60 ppm arsenic to be safe for residential use. Development of specific action levels in Eureka soils takes into account naturally occurring lead and arsenic background concentrations, other environmental factors and additional lab analyses that determine the amount of lead and arsenic that is available to be absorbed and retained by people. For this initial action, EPA used an "immediate action level" of 3,000 ppm for lead and 600 ppm for arsenic at occupied properties. Several unoccupied properties showed preliminary soil levels of 100,000 ppm lead and 38,000 ppm arsenic. The highest concentrations of lead and arsenic were found near the slag piles on the north and south ends of town and in areas associated with former smelter sites.

In the summer and fall of 2013, EPA acted with property owner approval to remove lead and arsenic soil contamination at individual properties. As a part of this removal action, EPA completed cleanups at sixteen properties and at a portion of the Eureka Elementary School.



During the spring and summer of 2014, EPA continued the removal action. Cleanup was conducted at an additional twenty-six properties where levels of lead and arsenic in soil exceeded immediate action levels or where levels of lead and arsenic approached these action levels and small children were known to be present. At this time, EPA also conducted interviews with several community members for the purpose of this plan.

In order to evaluate whether the lead-impacted soil in Eureka was resulting in lead exposure to residents, NDEP and EPA is offering free blood lead level testing for all Eureka residents. The test involves a simple finger prick and results are available within a few minutes. Young children are most susceptible to lead poisoning, therefore testing is highly recommended for those between 6 months and 6 years of age. Testing continues to be encouraged for all Eureka residents.

Next Step in the Cleanup Process

Engineering Evaluation and Cost Analysis (EE/CA)

EPA has initiated a study called an Engineering Evaluation and Cost Analysis (EE/CA). As part of this study, EPA will evaluate the cost, feasibility and necessity of cleaning up additional properties, slag piles and portions of former mill and smelter sites. This study will also evaluate options for addressing potential exposure to lead and arsenic contaminated soils at current or future occupied properties in Eureka where no additional active cleanup is recommended. It is expected that a draft version of this study will be completed in 2015. Upon release of the draft version of the EE/CA, EPA will place copies of this document in the Eureka Public Library and on the EPA and NDEP websites. EPA will communicate the release of the document to the community through a number of pathways, including a fact sheet and public announcement. A public comment period will give interested parties the opportunity to provide written comments on the document. During the public comment period, EPA will hold a community meeting. At this meeting, EPA will share the findings of the study and open the opportunity for the public to provide comments on the document.

Recommended Blood Testing

EPA and NDEP recommend that all individuals have their blood tested for lead periodically, especially young children and pregnant women. Free blood lead testing is available at the Eureka Medical Clinic located at 250 South Main St.



Property Soil Testing

If you would like to have the soil at your property tested, an appointment can be scheduled by calling Tom Dunkelman, EPA, at (775) 721-4712 or Jeff Collins, NDEP, at (775) 687-9381.

in Eureka. No appointment is needed and the clinic is open Monday to Friday, 8:00 AM to 5:00 PM. It is closed at lunch from Noon to 1:00 PM.

Cleanup and the Community

In the spring of 2014, EPA conducted community interviews with several Eureka residents. The interviews consisted of questions related to the cleanup activities and community perspectives. To create a more comprehensive representation of the community as a whole, EPA interviewed a broad range of individuals in the community. The following sections summarize the responses of Eureka residents in regard to communication methods, cleanup information and perspectives on the cleanup itself.

Every person who was interviewed noted that they had a basic understanding of the ongoing cleanup work in town and generally believed that it was (at least in part) a result of historic smelting. It was noted that the landscape contains naturally occurring lead and arsenic, regardless of mining activities.

Sharing Information in Eureka

From interviews, it was found residents of Eureka prefer to receive information through word-of-mouth. Interviewees referenced conversations at various establishments around town as the main method of receiving information about cleanup activities.

People also noted that the school system is an efficient and effective way to disseminate information. Fact sheets, when distributed correctly, can also be a useful tool. Fact sheets can be mailed to P.O. boxes, sent home with schoolchildren and posted around town. Some noted posting locations include the Owl Club, Raines' Market and public buildings.

EPA and NDEP would like to coordinate with local schools to increase outreach about children’s health issues, specifically in regard to lead and arsenic. Proposed activities include an “open house” type event, where anyone will be welcome to stop by on a certain day to discuss these issues with EPA, NDEP and a health care professional.

Successful outreach requires input from the community. If you’d like to get involved, please contact one of the people listed at the end of this document to share your ideas.

Publications and Outreach

Plain Talk Newsletter: At the discretion of the County Commissioners, EPA and NDEP will propose regular cleanup status updates to be published in the Plain Talk Newsletter. Plain Talk is published quarterly to inform Eureka County residents of the news and views of the Eureka County Commissioners. It provides the community with current events and information of interest. Plain Talk is distributed through post office boxes, the county’s website, and hard copies are available in the Eureka County Public Works office.

Eureka Sentinel Newspaper: Published in Ely, this newspaper can be used to announce community meetings or other important information.

Online: EPA and NDEP will share information through the Eureka County Website, the EPA website and the NDEP website.

One-on-One Communication: Acknowledging the community’s desire for face-to-face communication, EPA and NDEP will reach out to individuals occasionally when pertinent information needs to be shared. This has proven to be an effective tool in Eureka, especially when information needs to be shared with neighbors near an EPA worksite.

Fact Sheets: EPA and NDEP have issued and will continue to issue updates through written fact sheets. These fact sheets are mailed out to all residents and can be accessed on the EPA and NDEP websites. If you would like to be added to the mailing list, call Sarah Cafasso, EPA, at (415) 972-3076 or email her at cafasso.sarah@epa.gov.

Community Involvement Activities Throughout the Superfund Removal Process Graphic Being Developed. Graphic will appear here.

There are a few guidelines that will be followed when creating and distributing fact sheets.

Fact sheets will:

- Be clear and easy to understand
- Use visual representations (maps, etc.) when necessary
- Feature “Frequently Asked Questions” to address community needs and concerns

Be distributed:

- To all P.O. Boxes in Eureka
- To a mailing list open to any residents or property owners living outside of Eureka
- Through the school system (sent home with students)
- By posting around town (i.e. The Owl Club, Raines’ Market, public buildings)
- Through online format, via either county website or other listserv
- Through EPA and NDEP’s websites
- By direct contact with EPA or NDEP

Outreach Tools and Opportunities for Community Engagement

Eureka County Board of Commissioners meetings:

As requested by the commissioners, representatives from EPA and/or NDEP will continue to attend commission meetings on a regular basis. This is to ensure continuous communication regarding the progress of the cleanup and to address any necessary topics that may arise. County Commissioners’ approved meeting minutes are posted on the county website and emailed to those on the County Commissioners’ agenda distribution list. These meeting minutes are a good method for disseminating information to interested community members.

Community meetings: EPA and NDEP will hold community meetings in Eureka. The goal of these meetings is to provide opportunities for the community to hear about the activities related to the cleanup, learn more about the process and share comments or concerns. If the community would prefer a series of meetings, EPA and NDEP will arrange a schedule. The goal of these meetings is to encourage community engagement and show transparency in the cleanup process. Typically, these meetings are held at

significant junctures in the project, such as the release of the draft Engineering Evaluation and Cost Analysis.

The interviewees provided insight into how best to conduct community meetings in Eureka. Here are some guidelines that resulted from their input:

- Conduct meetings on different nights/at different times to account for mine workers’ schedules
- Be transparent and forthright
- Be aware of county events and schedule accordingly (i.e. note sports games schedule when people will be out of town)
- Advertise through fact sheets, newspaper, and the other methods of communication laid out in this document.
- Know in advance the topics people want addressed and make sure to address them

Community Interviews: As a part of the EE/CA process, interviews with community members are a requirement. These interviews serve to inform EPA and NDEP about how the community would best like to receive information (i.e. fact sheets, newsletter) concerning the cleanup. EPA conducted community interviews in the spring of 2014. The results of these interviews are incorporated into this Community Relations Plan, which is a living document. All interviewees have the choice to remain anonymous. At any point, residents may request that additional information be added to this plan by contacting the EPA Community Involvement Coordinator.

Public Comment Periods: In the EE/CA process, there will be distinct opportunities for public comments. The Draft EE/CA is a document that requires a public comment period. EPA and NDEP will inform the community when these documents are available for comment and for how long the comment period will last. The public comment period will occur when a draft EE/CA has been developed and processed through EPA and NDEP. At that point, it will be shared with the public. Public comments are useful for the development of a successful cleanup.

SLAG Working Group: The Eureka County SLAG (Soil, Lead, Arsenic and Geoscopic) Working Group was created by the Board of County Commissioners during their October 20th, 2014 meeting. The purpose of the group is to provide a more intensive and interactive review of

documents being produced by EPA and NDEP for the EE/CA. This group works closely with EPA and NDEP to provide comments and feedback throughout the proposed cleanup process. The SLAG can share community recommendations that might shape cleanup decisions. The SLAG's meeting schedule is determined in part by the documents available for review at any given time. EPA and NDEP will attend SLAG meetings and provide additional guidance materials and/or other relevant resources as requested by the SLAG. The SLAG will work to give EPA and NDEP notice of their proposed meeting times as they are determined, in order to allow the agencies time to plan travel. The SLAG Working Group is subject to Nevada's Open Meeting Law.

Addressing Community Concerns

As a result of the community interviews, EPA and NDEP were able to document many concerns expressed by Eureka residents. The intention of this plan is to ensure that community members' concerns are acknowledged and addressed in the future.

Community Concerns

The concerns raised in discussions of the cleanup with community members have been divided into six central categories and are listed below as direct, specific points:

Health and Safety

- Children's health and wellbeing
- Children's safety playing in their own yards
- Construction safety/workers' observation of proper safety procedures

Environmental

- Concern with the dust from the Ruby Hill Mine—is that dust contaminated as well? If so, what will NDEP/EPA do about it to protect citizen's health?



Why The Yellow Tape?

The yellow tape serves as a safety indicator. In the event that a property owner or any contractor is digging on the property, the tape alerts the person that they are digging beyond the clean backfill placed by EPA and into contaminated soil.

EPA puts the yellow tape in place when the floor of the excavation is still contaminated. Before laying down clean backfill, EPA tests the soil for contamination. If there is no remaining contamination, no yellow tape is laid down and the backfill is completed. If contamination exists, the yellow tape is placed by EPA along the border between clean backfill and the lower, contaminated floor.

Without the yellow tape, the property owner, a future owner or a contractor could inadvertently dig deeper than the removal depth and unknowingly expose themselves to the remaining contamination.

There is no other intent or purpose for the yellow tape.

- Where is the contaminated soil being placed temporarily?
- What will happen in the event of a flood or other natural disaster?

Economic

- Concern that the cleanup is affecting the economy because it is limiting those who have specific trades in town (i.e. construction, concrete, landscaping, gravel/fill supplier)
- People are losing work and would like to see EPA/NDEP diversify the work contracts
- Concern that property value will decrease as a result of a “Superfund” designation
- Concern that future use or sale of a property will be limited due to the cleanup

Logistics of the Cleanup (Evaluation of yards)

- Concern that the cleanup is spreading dirt through town during the yard removal process
- Is contamination being washed down the storm drains?
- What’s the deal with the yellow tape placed in the cleaned up yards?
 - What does the yellow tape signify?
 - What if a property owner wants to do construction/digging there in the future?
- What is the decision process for how yards are prioritized for cleanup?
- There have been three major fires and three major floods in the area—if another one occurs, what will happen to the contamination? Will all the clean yards be contaminated again?
- Where is the contaminated soil going to be placed long term?
- Why is only the top foot of soil being replaced?
- How are the samples taken?
- How long will the cleanup take?
- What is EPA expecting residents to do long-term?
- Will the site be placed on the National Priorities List (NPL)?
- Concern about the stigma related to the NPL listing
- Who pays for the cleanup?

Historical and Tourism

- Concern that the slag piles will be removed and affect tourism. Tourists come to Eureka to learn about historical mining—without the slag piles, perhaps tourists will be less likely to visit

- The slag piles are a “historical testament to the diligence of the old timers”
- What is the role of the tribal monitor during the cleanup process?
- If historical artifacts are found, how will EPA/NDEP make sure they are given to their rightful owner, the property manager?
- Concern that historical artifacts will be destroyed in the digging process
- Concern that tourists are hearing Eureka is contaminated and therefore afraid to visit

Explanation of Cleanup (Why is this happening?)

- Need more explanation of why the cleanup is occurring

Mistrust in Government

- Need to provide a clear description of each person’s role in the cleanup (i.e. Tribal Monitor, Sampling Team, Community Involvement Coordinator, etc.)
- People do not trust EPA
- Everyone grew up playing in the dirt in this community and they all seem to be fine—why is there a concern all of a sudden, after hundreds of years?

Health Effects and Blood Lead Testing

Most people are aware of the health problems related to lead and arsenic exposure. Many residents have already brought their children to get tested at the county health clinic.

Several residents acknowledged that the health effects could be real, but felt as though it was not an issue of concern in Eureka. As many residents grew up playing on



the slag piles and have never shown symptoms of lead/arsenic poisoning, there is some skepticism.

Perspectives on Government

Almost all of the interview responses reflected that the experience between the current EPA cleanup team and the community has been positive. However, there is a deep-seated mistrust of the government amongst many Eureka residents, which many discussed during interviews. Past issues with regulations, land use and other federal systems have created a feeling of skepticism towards the government. While most of these issues were not a direct result of the Superfund program and sometimes not even EPA, the “federal government” tends to be classified as a whole rather than by its parts. In spite of this sentiment, however, people overwhelmingly expressed positive interactions with EPA’s On Scene Coordinators, site team and contractors throughout this cleanup.

Given this feedback, EPA and NDEP will continue to form relationships with the community and develop an atmosphere of transparency and ongoing communication. A grassroots approach seems to have the highest potential for success. Residents also noted that one of the best ways to gain the trust of people in Eureka is by doing quality, consistent work during the yard cleanup process. Many people are impressed by the work that EPA has done on people’s yards—this has created a positive “buzz”. Word-of-mouth is the best way to spread news in town and a well-done property speaks volumes for the work of EPA.



Who’s on my property?

EPA enlists the help of several different professionals to ensure a successful cleanup. These are the types of people you might see during the cleanup process:

On-Scene Coordinator (OSC): The EPA officials responsible for monitoring or directing responses during the removal cleanup action. OSCs coordinate with local, state and regional response communities. In general, an OSC is responsible for: assessment, monitoring, response assistance and evaluation.

Removal Contractor: Representatives from EPA’s cleanup contractor perform excavation and backfill work.

Assessment/Sampling Contractor: Representatives from EPA’s technical assistance contractor perform soil sampling and analysis and conduct dust monitoring.

Archaeologist: As Eureka is on the National Historic Registry, monitoring for historic items pursuant to requirements imposed on EPA by the National Historic Preservation Act is necessary. Any artifacts encountered by the excavation are cataloged for historic recording and are given to the property owner pursuant to law.

Tribal Monitor: Tribal Monitors are present to observe the excavation in the event that human remains are discovered. If such remains are discovered, the first action is to stop all work and call the Eureka County Sheriff. Once the site is cleared as a crime scene, the tribal monitor may ascertain if the remains are Native American. If the remains are determined as such, the tribal monitor may then arrange to deal with the remains according to law.

United States Coast Guard (USCG): the USCG Strike Team personnel are on site to assist EPA with any sampling or health and safety matters. Ordinarily, USCG Strike Team personnel respond to oil spills or environmental matters in the marine environment. When they are otherwise available, such personnel routinely work with EPA personnel at EPA work sites.

Community Involvement Coordinator (CIC): EPA team member who works with the on-scene coordinators to inform the public about the response actions in accordance with Superfund’s interactive community involvement requirements.

Resources & Contacts

EPA's Site Overview:

http://www.epaossc.org/site/site_profile.aspx?site_id=7834

NDEP's Site Overview:

<https://ndep.nv.gov/BCA/eureka/index.htm>

Lead/Arsenic Health Resources

Agency for Toxic Substances and Disease Control, Arsenic:

<http://www.atsdr.cdc.gov/substances/toxsubstance.asp?toxid=3>

Agency for Toxic Substances and Disease Control, Lead:

<http://www.atsdr.cdc.gov/toxprofiles/tp.asp?id=96&tid=22>

Superfund Lead-Contaminated Residential Sites Handbook:

<http://www.epa.gov/superfund/lead/products/handbook.pdf>

The National Lead Information Center:

Learn how to protect children from lead poisoning and get other information about lead hazards on the Web at epa.gov/lead and hud.gov/lead, or call 1 (800) 424-LEAD (5323).

Community Contacts

Eureka County School District

P.O. Box 249

Eureka, NV 89316

(please do not use street address if sending mail to school district)

<http://www.eureka.k12.nv.us/education/district/district.php?sectionid=1>

Eureka County Board of Commissioners

P.O. Box 677

Eureka, NV 89316

<http://www.co.eureka.nv.us/comish/commission.htm>

The Eureka Sentinel, advertising opportunities:

<http://eurekasentinel.com/eureka-nevada-advertising-opportunities/>

For More Information, Contact:

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NDEP Public

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Site Repository

Eureka Public Library

80 Monroe St.

Eureka, NV 89316

(775) 237-5307

