

COMMUNITY INVOLVEMENT PLANS

DESCRIPTION

The Community Involvement Plan (CIP), previously known as the Community Relations Plan, is the foundation for the Community Involvement Program. It specifies the outreach activities that EPA will use to address community concerns and expectations, as learned from the *Community Interviews*. It will help the CIC advise the site team on appropriate activities. Because the CIP is a public document that is readily available to the community, it is also something that local residents can use to make sure that EPA is responsive.

 See Community Interviews, Tab 5

REQUIRED ACTIVITY?

Yes. For remedial actions, the National Contingency Plan (NCP) [40 CFR §300.430(c)(2)(ii)(A-C)] requires that a CIP be in place before remedial investigation field activities start. “The lead agency shall provide for the conduct of the following community relations activities, to the extent practical, prior to commencing field work for the remedial investigation: (ii) Preparing a formal community relations plan (CRP), based on the community interviews and other relevant information, specifying the community relations activities that the lead agency expects to undertake during the remedial response.” The NCP [40 CFR §300.435(c)(1)] further requires that “prior to the initiation of [remedial design], the lead agency shall review the CRP to determine whether it should be revised to describe further public involvement activities during RD/RA that are not already addressed or provided for in the CRP.”

For removal actions lasting 120 days or more, the NCP [40 CFR §300.415(n)(3)(ii)] requires that “the lead agency shall by the end of the 120-day period: (ii) prepare a formal community relations plan (CRP) based on the community interviews and other relevant information...”

For removal actions with a planning period of at least six months, the NCP [40 CFR §300.415(n)(4)(i)] requires the CIP to be completed “prior to the completion of the Engineering Evaluation/Cost Analysis.”


MAKING IT WORK

WHEN TO USE

The Government Performance and Results Act of 1993 states that all government plans should cover a five-year period and be revised every three years. This applies as long as the site is active. Prior to revising a CIP, EPA should determine whether additional community interviews are necessary. The revised CIP can confirm the existing plan or revise it, if necessary, to include new community involvement activities. It may not be prudent to revise a CIP if the site has been dormant for most of the three-year period; however, you should revise it before field work resumes. Also note that “dormant” does not include the remedial investigation time typically spent in the office and lab, during which results are coming in and being analyzed. The CIP is most effective when it changes as the site conditions change. It should be referred to frequently, much like a road map.

HOW TO USE

Begin CIP preparation with good information. Your most important resource will be the *Community Interviews*. Also consult the *LandView* data base, developed by EPA and the Census Bureau, for an excellent picture of the demographics involved, including the potential need for document *Translation Services*. Do some research to find any past news articles, editorials, or letters to the editor that give insight into local perceptions.

 See LandView, Tab 10; Translation Services, Tab 43

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The CIC usually has the contractor work on some portion of the CIP. Schedule a planning meeting with the Remediation Project Manager (RPM) and, if appropriate, the contractor to establish the tone and direction of the CIP as well as the issues, needs, activities, and deadlines. If you have a contractor do some writing, be sure that *you* receive all deliverables; nothing should go directly from the contractor to the RPM. After you have a revised draft that meets your approval, hand deliver it to the RPM for review, and agree upon a deadline for comments.

Regarding format, the cover page should identify the CIP as an EPA document. The CIP should specify what EPA *will* do, not what EPA *should* do. Although the CIP is site-specific, it should not be about the site. Rather, the CIP should be about how you will involve the community in site cleanup. It should also be issue-specific in that it should identify the community's issues, needs, and concerns. (In cases where one site affects more than one community, the CIP must identify each community and address its issues independently.)

After identifying community concerns, the CIP should identify specific activities, outreach products, or programs that you will use to address the concerns. For example, if groundwater contamination is an issue, identify it as such, and state that "EPA will conduct a series of workshops with a hydrogeologist to explain groundwater." If the health effects of the substances are an issue, then you explain that fact and propose an activity featuring a toxicologist to talk about the site-specific contaminants, their known effects on people, and how they move through groundwater. Establish a time line for activities throughout the pipeline (e.g., "As the site team gets sampling results, we will hold a series of groundwater workshops"), or referenced by seasons (e.g., "By the spring of 2002, we will hold a ...").

You are the target audience for the CIP; it is your plan to implement. Other audiences include future CICs, the RPM, and the contractor. Moreover, as you write it, remember that the CIP will be placed in the *Information Repository* for a community-wide audience.

In general, the content of the CIP should include:

- Overview of the CIP
- Capsule site description
- Community background
- Community issues and concerns (from community interviews, see below)
- Highlights of the CIP
- Community involvement activities and timing (including your *Communication Strategy*)
- Copy of the interview questions
- Contact list (*not* the private citizens interviewed or the site mailing list)
- Location for public meetings
- Location for the *Information Repository*, and
- Local media contacts

Interviews are strictly *confidential*. Names, addresses, or phone numbers of private citizens consulted during the community interviews should *not* appear in the CIP. There should be no way to attribute any information or comments to any private citizen. Local officials, interviewed in their official capacity, should be identified in the list of contacts, and their comments may be attributed. This is also true for representatives of the potentially responsible parties interviewed in their official capacity. Leaders of civic clubs, local businesses, or public interest groups are private citizens and should not be identified.

See Information
Repository,
Tab 21



See
Communications
Strategies,
Tab 3



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For more help on the content, refer to the attached sample, template guide, and template found in this section.

Tips

- Write it yourself.
 - Meet with the RPM and contractor to define style, tone, and direction.
 - Either personally write it or edit the contractor's work *before* sending it to the RPM.
 - Personally hand the draft CIP to the RPM and agree on a deadline for comments.
- Word the CIP as coming from EPA, not from a consultant.
- Be site-specific.
- Be issue-specific.
 - Identify the community's issues and concerns.
 - Identify the activities and products you will use.
 - Relate the products and activities to specific issues.
- Use quotes from the interviews, but do not attribute unless they are from official sources.
- Establish a time line for community involvement activities.
 - Link it to technical milestones or reference it to seasons or annual quarters.
 - Avoid stating specific dates as deadlines.
- Make it a five-year plan.
- Revise it every three years or as required, whichever comes first.
- Use it and treat it as a living, working document to guide you through the process.

RELATED TOOLS/RESOURCES IN THE TOOLKIT

- Communication Strategies, Tab 3
- Community Interviews, Tab 5
- Community Involvement Impact Analysis, Tab 6
- Focus Groups, Tab 17
- LandView, Tab 10
- Translation Services, Tab 43

ATTACHED ITEMS WITHIN THIS TOOL

- Attachment 1: Community Involvement Plan Template
- Attachment 2: Community Involvement Activities Template
- Attachment 3: Sample Community Involvement Plan

COMMUNITY INVOLVEMENT PLANS

ATTACHMENT 1: COMMUNITY INVOLVEMENT PLAN TEMPLATE

COMMUNITY INVOLVEMENT PLAN

***** SUPERFUND SITE

ANYTOWN, STATE

MONTH YEAR

U. S. ENVIRONMENTAL PROTECTION AGENCY
REGION __

The U. S. Environmental Protection Agency's (EPA)
Superfund Community Involvement Program is committed
to promoting communication between citizens and the Agency.

Active public involvement is crucial to the success of any public project.

EPA's community involvement activities at the
***** Superfund Site
are designed to

Inform the public of the nature of the environmental issues associated with the site,

Involve the public in the decision-making process that will affect them,

Involve the public in the responses under consideration to remedy these issues, and

Inform the public of the progress being made to implement the remedy.

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Section 1.0

Overview of the Community Involvement Plan

EPA developed this Community Involvement Plan to facilitate two-way communication between the community surrounding the (***) Superfund Site and EPA and to encourage community involvement in site activities. EPA will utilize the community involvement activities outlined in this plan to ensure that residents are continuously informed and provided opportunities to be involved.

This Community Involvement Plan addresses (***)'s relationship to the community and EPA (Section 2.0), provides a background of the community (Section 3.0), presents EPA's community involvement program (Section 4.0), and provides a listing of resources available (Appendices). EPA drew upon several information sources to develop this plan, including community interviews and site files. EPA's Regional Office will oversee the implementation of the community involvement activities outlined in this Plan.

Section 2.0

Capsule Site Description

2.1 Site History

- Detailed chronological history of Site use and ownership relevant to problem at hand
- Hazardous wastes produced by or found at the Site
- When and why EPA intervened
- Community reaction to the Site

2.2 Site Description/Location

- Geographical location, size, and surroundings of Site
- Site in relationship to:
 - homes
 - businesses
 - schools
 - playgrounds
 - lakes
 - streams/rivers
 - wetlands
 - parks
 - health facilities
 - wildlife species/sensitive ecological areas
- Maps showing location of Site within:
 - state/region
 - community
 - proximity to elements of concern (above)
- A map of the Site itself

2.3 Site Inspections and Cleanup Activities

- Type of hazardous materials present
- Nature of threat to human health and environment
- History of inspections and studies conducted
- Lead agency for the cleanup

Section 3.0 Community Background

3.1 Community Profile

- Description of the community that analyzes key local issues and interests:

Community and setting

Population and/or growth

Minorities

Businesses

Nearby regional centers

Residential groupings

Economics

School system

- The need for translation services, whether a second language for non-English speaking residents or signing for the hearing impaired

3.2 History of Community Involvement

- Community actions taken to address problems at Site
- Community perceptions of previous cleanup efforts
- Community perceptions of various levels of government involvement
- Any active PRPs associated with Site or past Site operations

3.3 Key Community Concerns

- The analysis of major public concerns uncovered in community interviews

[THIS IS THE MOST IMPORTANT PART OF THE PLAN AS ALL ACTIVITIES ARE BASED UPON IT!]

3.4 Response to Community Concerns

- Any community involvement activities EPA undertook in direct response to community concerns before the CIP was prepared

3.5 Summary of Communication Needs

- Brief summary of communication needs and desires as identified by the community members interviewed

Section 4.0 EPA's Community Involvement Program

The overall goal of EPA's community involvement program is to promote two-way communication between citizens and the EPA and to provide opportunities for meaningful and active involvement by the community in the cleanup process. EPA will implement the community involvement activities described below. The following plan is based on the results of the community interviews described earlier; it addresses each issue that was identified as being important to the community.

4.1 The Plan

Issue 1: (***)InsertIssue(***)

Activity 1A: (***)InsertActivity(***)

- Objective:
- Method:
- Timing:

Activity 1B: (***)InsertActivity(***)

- Objective:
- Method:
- Timing:

Issue 2: (***)InsertIssue(***)

Activity 2A: (***)InsertActivity(***)

Issue X: Keeping the public informed and up to date

Activity XA: Designate an EPA Community Involvement Coordinator (CIC).

- Objective: To provide a primary liaison between the community and the EPA, and to ensure prompt, accurate, and consistent responses and information dissemination about the site. In those instances where EPA's CIC may be unable to provide adequate information (such as on technical issues), inquiries will be directed to the appropriate EPA contact.
- Method: EPA will designate an EPA CIC to handle site inquiries and serve as a point of contact for community members. The CIC is appointed by the Region __ headquarters. (***)InsertName(***) is the EPA CIC assigned to the site. (S)He will work closely with (***)InsertName(***), EPA's Remedial Project Manager for the site.
- Timing: The CIC was designated on (***)InsertDate(***)).

Activity XB: Prepare and distribute site fact sheets and technical summaries.

- Objective: To provide citizens with current, accurate, easy-to-read, easy-to-understand information about (***)InsertSiteName(***)).
- Method: Fact sheets will be mailed to all parties on the site mailing list. In addition, copies will be available at the information repository and in various cooperating business locations in the community.

- Timing: EPA will prepare and distribute fact sheets (Monthly, Bi-Monthly, Quarterly, as needed, or other frequency)

Activity XC: Involve students, parents, teachers through area schools.

- Objective: To educate faculty, students and their parents about the site, to invite and address their concerns regarding it, and to caution students about the site.
- Method: Address school faculty and students through visits and presentations to classroom, faculty, school assembly, or other meetings or events. Additionally, communicate with parents through take-home materials provided to the students and/or by attending and participating in PTA meetings or events.
- Timing: As community concern warrants or at least every year until the site is closed out.

Activity XD: Provide a toll-free “800 number” for the community to contact EPA.

- Objective: To enable citizens to get the latest information available when they want it, rather than having to wait for a meeting or a fact sheet, and without incurring any cost.
- Method: EPA will activate the 800 number and publish it periodically in the local papers and in all fact sheets.
- Timing: The line is currently operational (1-800-533-3508).

Activity XE: Maintain a mailing list for the Site.

- Objective: To facilitate the distribution of site-specific information to everyone who needs or wants to be kept informed about the site.
- Method: EPA will create a mailing list that includes all residences adjacent to the site, in known or suspected paths of migration, or those otherwise affected by the site. EPA will also solicit interested parties via fact sheets, newspaper articles, public meetings, public availabilities, etc.
- Timing: EPA will begin working on this mailing list immediately and will review/revise it periodically to keep it current.

Activity XF: Establish and maintain Information Repositories.

- Objective: To provide a convenient location where residents can go to read and copy official documents and other pertinent information about the site and EPA activities.
- Method: The repository is a reference collection of site information containing the Administrative Record file, other site-specific information, the Community Involvement Plan, information about the Technical Assistance Grant program, and the general Superfund process. The Community Involvement Coordinator will work with a local contact to establish the local repository. This repository will be accessible to the physically challenged, will have copier facilities, and will be available to residents during normal business hours and at least some evening and/or weekend hours. Additional repositories may also be established, including one at the EPA Region __ headquarters in _____.
- Timing: EPA established the local repository on (***)Insert Date(***) located at (***)InsertLocation(***). EPA adds new documents as they become available.

Activity XG: Provide Site and Superfund information on the Internet.

- Objective: To provide key resources for searching and listing both general and specific information about Superfund and hazardous waste issues.
- Method: A Site Status Summary for this site can be found at http://www.epa.gov/_____. Information about EPA and Superfund can be found at:
 - EPA Headquarters: <http://www.epa.gov>

- EPA Region __: (***)Insert URL(***)
- EPA Region __ (***)Insert Office Name(***): (***)Insert URL(***)

The Proposed Plan and the Record of Decision (ROD) for the site will be placed on the internet as they are completed.

- Timing: Site Status Summaries are periodically updated.

Activity XH: Provide Technical Assistance Grant (TAG) information.

- Objective: To provide resources for community groups to hire technical advisors who can assist them in interpreting technical information about the site.
- Method: EPA will provide information about the TAG program at public meetings and in site fact sheets. EPA will also provide briefing sessions to interested groups if so requested. EPA will provide TAG applications to qualified groups, and will provide assistance to the group in completing the application.
- Timing: EPA will continue to promote TAGs until one is awarded.

Activity XI: Establish and maintain the Administrative Record.

- Objective: To provide residents with a paper trail of all documents, resources, etc. used by the Remedial Project Manager and Site Team in reaching all decisions about the site and its cleanup.
- Method: EPA will provide at least two sets of the Administrative Record for the site, one in the EPA Region __ offices located at (***)Insert Address(***) and one located in the local Information Repository near the site.
- Timing: The Administrative Record is opened as soon as site investigation begins and remains open until the last ROD is signed.

Activity XJ: Conduct special events.

- Objective: To educate citizens, add a sense of closure, highlight a major event or milestone, recognize significant citizen or PRP activity, etc.
- Method: (***)InsertSiteSpecialEvent(***) Examples include: A special topic educational campaign, construction completion party, on-site demolitions, transitions to the next phase, etc.
- Timing: (***)InsertDateofActivity,LocationandNameofEvent(***)

Issue Y: Provide adequate and meaningful opportunities for community involvement

Activity YA: Hold public meetings.

- Objective: To update the community on site developments and address community questions, concerns, ideas and comments.
- Method: Refer to Appendix XX for suggested meeting locations. EPA will schedule, prepare for, and attend all announced meetings. EPA will provide at least two weeks' notice of the scheduled meeting. The Regional Project Manager, Community Involvement Coordinator, and other appropriate EPA staff will attend.
- Timing: A public meeting is required during the Proposed Plan comment period (see below). EPA will hold other public meetings as appropriate.

Activity YB: Encourage formation of a Community Advisory Group (CAG).

- Objective: To provide citizens with a meaningful way to become actively involved, and to provide the Site Team with a viable means of learning citizen concerns and attitudes.
- Method: EPA will encourage the formation of a CAG and provide support as appropriate to facilitate its forma-

tion. If formed, EPA will provide administrative support but will not be an active member.

- Timing: EPA will respond to any requests for help to form a CAG. As necessary, EPA will promote CAGs regularly throughout the Superfund process until one is formed.

Activity YC: Make informal visits to community.

- Objective: To help keep community members informed about the site, while providing EPA with feedback about site activities and the community's opinions.
- Method: EPA will establish a presence in the community through informal, often unscheduled visits to talk spontaneously with local residents.
- Timing: Throughout the entire Superfund process.

Activity YD: Solicit comments during a Public Comment Period.

- Objective: To give community members an opportunity to review and comment on various EPA documents, especially the Proposed Plan. This provides the citizens with meaningful involvement in the process and also provides the Site Team with valuable information for use in making decisions.
- Method: EPA will announce each comment period separately. Announcements will appear in local newspapers and EPA fact sheets; they will include particulars on duration, how to make comments, where to submit comments, etc. EPA may solicit comments on the following information/draft documents: draft CIP, draft summary of test results (not individual tests) and initial interpretation, preliminary findings on the RI and a list of possible remedies likely to be considered, preliminary findings of the FS and a brief summary of the leading contender for the proposed remedy, and preliminary plans for implementation and construction.
- Timing: Comment periods will be announced as appropriate. A comment period is required in conjunction with the announcement of the Proposed Plan and will last a minimum of 30 days.

Activity YE: Prepare and issue a Responsiveness Summary.

- Objective: To summarize comments received during comment periods, to document how the EPA has considered those comments during the decision-making process, and to provide responses to major comments.
- Method: EPA will prepare a Responsiveness Summary as a section of the Record of Decision. The Responsiveness Summary will include four sections: 1. Overview; 2. Background on Community Involvement; 3. Summary of comments received and Agency responses; 4. Remedial Design/Remedial Action concerns. All information, both technical and nontechnical, will be conveyed in a manner that is easily understood.
- Timing: EPA will issue the Responsiveness Summary as part of the Record of Decision.

Activity YF: Revise the Community Involvement Plan (CIP).

- Objective: To identify and address community needs, issues, or concerns regarding the site or the cleanup remedy that are not currently addressed in this CIP.
- Method: The Revised CIP will update the information presented in the previous version of the CIP.
- Timing: EPA will revise the CIP as community concern warrants or at least every three years until the site is closed out.

4.2 Time Frame Summary for Community Involvement Activities

ACTIVITY	TIME FRAME
Designate an EPA Community Involvement Coordinator (CIC)	
Prepare and distribute site fact sheets and technical summaries	
Involve students, parents, teachers through area schools	As needed, at least annually
Provide a toll-free "800 number" for the community to contact EPA	Currently in operation
Maintain a mailing list for the Site	Ongoing
Establish and maintain Information Repositories	Established, update as needed
Provide Site and Superfund information on the Internet	Currently available; update as needed
Provide Technical Assistance Grant (TAG) information	Ongoing
Establish and maintain the Administrative Record	Established, update as needed
Conduct special events	
Hold public meetings	
Encourage formation of a Community Advisory Group (CAG)	Ongoing
Make informal visits to community	As needed
Solicit comments during a Public Comment Period	As needed and required
Prepare and issue a Responsiveness Summary	Following public comment periods
Revise the Community Involvement Plan (CIP)	As needed, at least every 3 years



Appendix A
EPA Regional Contacts

Name
Remedial Project Manager
U.S. EPA, Region __
Address
Address
Tel:
Fax:
E-mail: name@epa.gov

Name
Technical Assistance Grant Project Officer
U.S. EPA, Region __
Address
Address
Tel:
Fax:
E-mail: name@epa.gov

Name
Community Involvement Coordinator
U.S. EPA, Region __
Address
Address
Tel:
Fax:
E-mail: name@epa.gov

Name
Superfund Ombudsman
U.S. EPA, Region __
Address
Address
Tel:
Fax:
E-mail: name@epa.gov



**Appendix B
Local Officials**

Mayor

City Council Members

Township Supervisors, etc.

Local health officials

Fire Department

Police Department

**Appendix C
State Officials**



**Appendix D
Federal Elected Officials**

U.S. Senate

U.S. House of Representatives

**Appendix E
Environmental and Active Citizens Groups**



**Appendix F
Potentially Responsible Parties**

**Appendix G
Media Contacts**

Television Stations:

Radio Stations:

Newspapers:



**Appendix H
Meeting Locations**

**Appendix I
Repository Locations**

Local Repository:

EPA Region __ Repository:

U.S. Environmental Protection Agency

Address

Address

Address

Tel

Hours Open to Public:

[Day - Day]

[Hour - Hour]



Appendix J
Other Local Resources



ATTACHMENT 2: COMMUNITY INVOLVEMENT ACTIVITY TEMPLATES

GUIDE TO USING THE ACTIVITIES TEMPLATES

On the following pages you will find ready-to-edit templates for various community involvement activities. They are provided to reduce the time required to prepare your complete Community Involvement Plan (CIP). They are arranged in alphabetical order, required activities first, followed by the discretionary activities. The numbers accompanying the activities are for reference purposes only. They do not denote priority for activities at any particular site.

1. If your CIP is not open at this time, open it; if it is, switch to it.
2. Go to section 3 of the CIP. Identify those issues, concerns, etc. that are listed as being important to the community.
3. Go to section 4 of the CIP; working chronologically from the most specific to the more generic, insert one site-specific community issue as identified in section 3 in each box provided;
4. Delete the extra blank issue boxes;
5. Switch to the activities template document;
6. Review the index of available templates and identify the activities you want to use, and with which issue you want to use them;
7. Working one activity at a time,
 - a. find the template;
 - b. highlight it in its entirety;
 - c. copy it (do not cut);
 - d. press the down or right arrow key to clear the highlighting;
 - e. switch to the appropriate issue in the CIP, place your cursor on the first line under the issue box;
 - f. paste the template into the CIP;
 - g. repeat the process for each template you plan to use.
8. Number the activity either sequentially (e.g., 1, 2, 3, 4...), or as a subset of the issue (e.g., 1A, 1B, 2A, 2B, 2C...), whichever you prefer or per regional policy;
9. Edit the activities to make them apply to your particular situation.

REQUIRED ACTIVITIES

Activity #1: ADMINISTRATIVE RECORD

Objective: To provide residents with a paper trail of all documents, resources, etc. used by the RPM and Site Team in reaching all decisions about the site and its cleanup.

Method: EPA will provide at least two Administrative Records, one in the Regional offices, located at (***) insert office address (***) and one located in the local Information Repository (ies) near the site. The Administrative Record will contain all documents used by the RPM and Site Team to draw conclusions and reach decisions, including a chronological listing of all community involvement products and activities.

Timing: The Administrative Record is opened as soon as site investigation begins and remains open until the last ROD is signed.

Activity #2: COMMUNITY INVOLVEMENT COORDINATOR

Objective: To provide a primary liaison between the community and the Agency, and to ensure prompt, accurate, and consistent responses and information about the site. If EPA's Community Involvement Coordinator is unable to provide adequate information, inquiries will be directed to the proper EPA contact.

Method: EPA will designate an EPA CIC to handle site inquiries and serve as a site point of contact for community members. The CIC is appointed by the Regional offices. (***)Insert Name(***) is the EPA CIC assigned to the site. (S)He will work closely with (***)Insert Name(***), EPA's RPM for the site.

Timing: The CIC was designated on (***)Insert Date(***)).

Activity #3: FACT SHEETS—PREPARE AND DISTRIBUTE SITE FACT SHEETS AND TECHNICAL SUMMARIES. (NOTE: YOU MAY USE THIS ACTIVITY FOR SEVERAL ISSUES, WHICH WOULD ENABLE YOU TO BE MORE SPECIFIC IN YOUR DESCRIPTION, AND ALSO ALLOW YOU TO PLAN YOUR OUTREACH BETTER.)

Objective: To provide citizens with current, accurate, easy-to-read, easy-to-understand information about *** Site. (Note: Fact sheets may be used to supply the public with information about past, current, and upcoming site activities; question and answer sections focusing on community concerns; overviews of cleanup technologies; site maps; listings of EPA and other relevant contact persons; and tear-off forms so that residents can add their names to the EPA site mailing list.)

Method: Fact sheets will be mailed to all parties on the site mailing list. In addition, copies will be available at the information repository and in various cooperating business locations in the community.

Timing: EPA will prepare and distribute fact sheets (Monthly, Bi-Monthly, Quarterly).

Activity #4: INFORMATION REPOSITORIES

Objective: To provide a convenient location where residents can go to read and copy official documents and other pertinent information about the site and EPA activities.

Method: The repository is a reference collection of site information containing the Administrative Record file, other site-specific information, the Community Involvement Plan, information about the Technical Assistance Grant program, and the general Superfund process. The CIC will work with a local contact as recommended in the CIP to establish the repository. The repository will be accessible to the physically challenged, will have copier facilities, and will be available to residents during normal business hours and at least some evening and/or weekend hours.

Timing: EPA established the repositories on (***)Insert Date(***). EPA adds new documents as they become available.

Activity #5: PUBLIC COMMENT PERIOD

Objective: To give community members an opportunity to review and comment on various EPA documents, especially the Proposed Plan. This provides the citizens with meaningful involvement in the process and also provides the Site Team with valuable information for use in making decisions.

Method: EPA will announce each comment period separately. Announcements will appear in local newspapers and Agency fact sheets; announcements will include particulars on duration, how to make comments, where to submit comments, etc. EPA will solicit comments on the following information/draft documents: list of PRPs, list of known contaminants, draft CIP, draft summary of test results (not individual tests) and initial interpretation, preliminary findings of the RI and a list of possible remedies likely to be considered, preliminary findings of the FS and a brief summary of the leading contender for the proposed remedy, and preliminary plans for implementation and construction.

Timing: Comment periods will be announced as appropriate. A comment period is required in conjunction with the announcement of the Proposed Plan and will last a minimum of 30 days. (Note: it would be wise to list other times when you will have comment periods; see the comment period tool)

Activity #6: Public Meetings

Objective: To update the community on site developments and address community questions, concerns, ideas, and comments.

Method: Refer to Appendix ___ for suggested meeting locations. EPA will schedule, prepare for, and attend all announced meetings. EPA will provide at least two weeks' notice of the scheduled meeting. The CIC, RPM, and other EPA staff as appropriate will attend.

Timing: A public meeting is required during the Proposed Plan comment period. EPA will hold other meetings as appropriate.

Activity #7: Responsiveness Summary

Objective: To summarize comments received during comment periods, to document how the Agency has considered those comments during the decision making process, and to provide responses to major comments.

Method: EPA will prepare a Responsiveness Summary as a section of the Record of Decision. The Responsiveness Summary will include four sections: 1. Overview, 2. Background on Community Involvement, 3. Summary of comments received and Agency responses, 4. Remedial Design/Remedial Action concerns. All information, both technical and nontechnical, will be conveyed in a manner that is easily understood.

Timing: EPA will issue the Responsiveness Summary as part of the Record of Decision.

Activity #8: Revise the Community Involvement Plan (CIP)

Objective: To identify and address community needs, issues, or concerns regarding the site or the cleanup remedy that are not currently addressed in this CIP.

Method: The Revised CIP will update the information presented in the previous version of the CIP.

Timing: EPA will revise the CIP as community concern warrants or at least every three years until the site is closed out.

Activity #9: Technical Assistance Grant (TAG) Information

Objective: To provide resources for community groups to hire technical advisors who can assist them in interpreting technical information about the site.

Method: EPA will provide information about the TAG program at public meetings and in site fact sheets. EPA will also provide briefing sessions to interested groups if so requested. EPA will provide TAG applications to qualified groups, and will provide assistance to the group in completing the application.

Timing: EPA will continue to promote TAGs until one is awarded.

DISCRETIONARY ACTIVITIES

Activity #1: Availabilities and Poster Sessions

Objective: To enable the residents to ask any questions they may have for EPA's representatives, in a comfortable and informal setting, without the fear of speaking in a public forum. To provide EPA the opportunity for feedback and to uncover the major points, issues, and incidences about the site that are not fully understood by the community.

Method: An informal session held by EPA, at which the residents are able to speak with the Site Team members on a one-on-one basis. It should be held at a convenient time and location for the residents. EPA may use visual aids, hand out literature or fact sheets, and use posters to identify specific topics available for discussion.

Timing: EPA held availabilities and/or poster sessions at (***)Insert Location***) on (***)Insert Date***). These sessions are viable, less structured alternatives to non-required public meetings, and should be conducted as needed, based upon community interest.

Activity #2: Community Advisory Groups (CAG)

Objective: To provide citizens with a meaningful way to become actively involved, and to provide the Site Team with a viable means of learning first hand citizen concerns, attitudes, etc.

Method: EPA will encourage the formation of a CAG and provide support as appropriate to facilitate its formation. If formed, EPA will provide administrative support but will not be an active member.

Timing: EPA will respond to any requests for help to form a CAG. As necessary, EPA will promote CAGs regularly throughout the Superfund process until one is formed.

Activity #3: Electronic Mail

Objective: To communicate in a quick and informal manner that allows the CIC to send information to community groups, newspapers, or to an electronic bulletin board.

Method: Set up an E-mail address through (***)Insert name of Internet E-mail provider and E-mail address***).

Timing: E-mail address is established on (***)Insert Date***).

Activity #4: Internet

Objective: To provide key resources for searching and listing both general and specific information about Superfund and hazardous waste issues.

Method: The CIC will post site-specific information on the Internet, including news releases, fact sheets, reports, findings, etc. Information for this site can be found at <http://www.epa.gov>.... (note: complete the URL for where this information is posted)

Timing: Regions have Internet sites to which new information is added as available.

Activity #5: Mailing List: Maintain a complete and accurate mailing list

Objective: To facilitate the distribution of site-specific information to everyone who needs or wants to be kept informed about the site.

Method: EPA will create a mailing list that includes all residences adjacent to the site, in known or suspected paths of migration, or those otherwise affected by the site. EPA will also solicit interested parties via fact sheets, newspaper articles, public meetings, public availabilities, etc.

Timing: EPA will begin working on this mailing list immediately and will review/revise it periodically to keep it current.

Activity #6: Observation Deck

Objective: To allow community members and interested parties to view the work being conducted at the site.

Method: EPA will provide a tall platform in a safe area and notify the public of its access hours.

Timing: The deck will be available during the RI field work and remedial construction.

Activity #7: Presentations

Objective: To provide another means of communicating important information to key audiences.

Method: EPA will offer speakers to local civic and business clubs, local schools, and other local organizations.

Timing: EPA made a presentation at (***)Insert Location**), for (***)Insert Audience**) on (***)Insert Date**). It is best to plan presentations around major events or decisions.

Activity #8: Questionnaires

Objective: To enable EPA to better understand the affected residents, by obtaining their opinions, comments, and concerns regarding activities at the site. EPA will use this information to build or restructure the CIP.

Method: EPA will mail questionnaires to affected parties on the site mailing list.

Timing: EPA will utilize questionnaires as site activity warrants, but at least once a year. Questionnaires can also be used to supplement the community interviews.

Activity #9: Small Group Sessions

Objective: To allow EPA to address the specific concerns of small groups of residents, in an informal setting, and at the same time provide EPA the opportunity to build and maintain relationships with the residents.

Method: EPA will hold these sessions at residents' homes, and ask the homeowner/host to invite neighbors and friends. The session will be informal and educational in nature, focusing on issues of concern to the residents. If appropriate, EPA will invite a representative from the dissenting group to attend all such sessions to ensure that all information is consistent.

Timing: Small group sessions will be utilized throughout the entire Superfund process, especially during the RI/FS, Proposed Planning stage, and RD/RA.

Activity #10: Special Events

Objective: To educate citizens, add a sense of closure, highlight a major event or milestone, recognize significant citizen or PRP activity, etc.

Method: (***)Insert Site special event***) Examples include: A special topic educational campaigns, construction completion party, on-site demolitions, transitions to the next phase, etc. Tip: if nothing else, plan an event at construction completion.

Timing: (***)Insert date of activity, location and name of event***)

Activity #11: Toll-free "800 Number"

Objective: To enable citizens to get the latest information available when they want it, rather than having to wait for a meeting or a fact sheet, and without incurring any cost.

Method: EPA will activate the 800 number and publish it periodically in the local papers, and in all fact sheets. The CIC will record a brief message weekly; this message will recap what was done the preceding week, announce plans for the coming week, and announce any major milestones met or anticipated.

Timing: The line will be operational before the RI field work begins.

Activity #12: Telephone Conference Calls

Objective: To involve interested parties in EPA's decision-making process.

Method: The CIC and RPM will “meet” regularly via conference calls with key stakeholders, including local leaders, media, TAG/CAG leaders to keep them current and to enable them to express their opinions or questions regarding the (***) Site.

Timing: Throughout the Superfund process.

Activity #13: TRANSLATION SERVICES

Objective: To allow EPA to convey information to the non-English speaking audiences or the hearing impaired.

Method: EPA will research the target community to identify the predominant home languages and determine the need for translation services. As appropriate, EPA will provide printed information to the non-English speaking community members in their native language. EPA will provide a signer, for the hearing impaired at the public meetings.

Timing: Throughout the entire Superfund process.

Activity #14: Visits

Objective: To help keep community members informed about the site, while providing EPA with feedback about site activities and the communities opinions.

Method: EPA will establish a presence in the community through informal, often unscheduled visits to talk spontaneously with local residents.

Timing: Throughout the Superfund process

Activity #15: Workshops

Objective: To provide the community with the opportunity to gain knowledge about (***) groundwater, toxicology, VOCs, etc. (***)).

Method: EPA will plan, schedule, announce, and conduct informal educational sessions for community members to learn about specific topics from EPA and other experts. EPA will work with local residents for scheduling, location, and so on. The CIC and the appropriate topic expert will be present.

Timing: During the RI/FS

Activity #: (*) PASTE THIS INTO YOUR CIP, TO ADD ANY ACTIVITIES NOT LISTED ABOVE (***)**

Objective:

Method:

Timing:

Activity #: (*) PASTE THIS INTO YOUR CIP, TO ADD ANY ACTIVITIES NOT LISTED ABOVE (***)**

Objective:

Method:

Timing:



ATTACHMENT 3: SAMPLE COMMUNITY INVOLVEMENT PLAN

**SAMPLE COMMUNITY INVOLVEMENT PLAN
PLEEZCLENE SUPERFUND SITE**

PREPARED BY THE US EPA REGION 11

The U.S. Environmental Protection Agency's (EPA)

Superfund Community Involvement Program is committed to promoting communication between citizens and the Agency.

Active public involvement is crucial to the success of any public project.

An open and candid process typically reduces or, in many cases, eliminates costly and time consuming destructive criticism.

This criticism typically results from a lack of early and active involvement in the decision making rather than objections to the project itself.

The lack of involvement only supports an inherent distrust and lack of credibility with the agency; the public automatically assumes the worst case scenario.

EPA's community involvement activities at the Pleezclene Superfund site are designed to inform the public of the nature of the environmental issues associated with the site, involve the public in the decision making process that will affect them, the responses under consideration to remedy these issues, and the progress being made to implement the remedy.

SAMPLE COMMUNITY INVOLVEMENT PLAN

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SECTION 1.0: OVERVIEW OF THE COMMUNITY INVOLVEMENT PLAN

EPA developed this Community Involvement Plan to facilitate two-way communication between the community surrounding the Pleezclene Superfund Site and EPA and to encourage community involvement in site activities. EPA will utilize the community involvement activities outlined in this plan to ensure that residents are continuously informed and provided opportunities to be involved.

This Community Involvement Plan addresses Nevaclene Corporation's relationship to the community and EPA (Section 2.0), provides a background of the community (Section 3.0), presents EPA's community involvement program (Section 4.0), and provides a complete listing of resources available (Appendices). EPA drew upon several information sources to develop this plan, including community interviews, site files, and an information meeting. EPA's Regional Office will oversee the implementation of the community involvement activities outlined in this plan.

SECTION 2.0: CAPSULE SITE DESCRIPTION

SECTION 2.1: SITE HISTORY FROM 1952 TO 1993

The Nevaclene Corporation, owner of the site property, has been manufacturing various goods at this site since 1917. It traditionally has had, and continues to have, large defense contracts. For nearly 25 years, Nevaclene Corporation recycled industrial cleaning solvents used in its manufacturing processes and sold the distilled solvents, including trichloroethylene (TCE), 1,1,1-trichloroethane, tetrachloroethylene, and methylene chloride. Nevaclene Corporation disposed of drummed waste that contained distillation residue from its recycling operation and other wastes from its manufacturing processes on the site property.

By the early 1980s, residents' familiarity and involvement with the site increased when soil and groundwater contamination was discovered on Nevaclene's property, and groundwater contamination was discovered in nearby residential water wells. The soil and groundwater contained elevated concentrations of TCE and related volatile organic compounds.

ABOUT NEVACLENE

CORPORATION

- * 1952-1992: *NEVACLENE CORPORATION RECYCLED INDUSTRIAL CLEANING SOLVENTS AND SOLD DISTILLED SOLVENTS.*
- * 1980-1981: *NEVACLENE CORPORATIONS AND DER TESTED RESIDENTIAL WATER WELLS AND ONSITE WELLS, DISCOVERING TCE CONTAMINATION.*
- * 1981-1984: *NEVACLENE CORPORATION REMOVED DRUMS OF WASTE AND SOIL FROM ITS PROPERTY.*
- * 1982-1992: *NEVACLENE CORPORATION PERIODICALLY TESTED RESIDENTIAL WELLS AND PERIODICALLY REPLACED FILTERS.*
- * 1982: *EPA PLACED THE SITE ON THE NATIONAL PRIORITIES LIST.*
- * 1988: *NEVACLENE CORPORATION AGREED TO CONDUCT STUDY.*
- * 1992: *NEVACLENE CORPORATION FAILED TO MEET EPA'S HAZARDOUS WASTE FACILITY PERMITTING REQUIREMENTS.*
- * 1993: *EPA TRANSFERRED NEVACLENE CORPORATION TO THE SUPERFUND SITE PROGRAM AND TOOK CONTROL OF CLEANUP ACTIVITIES.*

Nevaclene Corporation voluntarily initiated cleanup of its property, but soil and groundwater contamination persisted. Nevaclene Corporation and the State's Department of Environmental Resources conducted sampling of residential water wells in the Pinewoods development, which detected TCE contamination in nine of the wells sampled. Because the groundwater contamination was associated with the recycling operations at the Nevaclene Corporation, the company agreed to install water filters on these nine wells and maintain and replace the filters. These filters were designed to remove the contaminants from the water, thus purifying the water supply.

Affected residents were involved with the Nevaclene Corporation during its periodic sampling and testing of water wells, as well as its periodic replacement of filters on the wells with TCE contamination, from 1982 to 1992.

From 1980 to 1992, the Nevaclene Corporation operated as a hazardous waste storage and treatment facility under

the authority of the Resource Conservation and Recovery Act (RCRA), but failed to meet the storage permitting requirements. Therefore, Nevaclene currently is not authorized to treat hazardous wastes or store hazardous wastes longer than 90 days.

In late 1982, EPA placed the Nevaclene Corporation facility on the National Priorities List (NPL), referring to it as the Pleezclene Site. Placing the site on the NPL triggered its eligibility for extensive, long-term cleanup under the Superfund Program. Because this site was already being addressed by the State's Department of Environmental Resources (DER), EPA did not initially take an active role in site activities. In the six years that followed, DER continued to hold primary responsibility for cleanup activities at the site.

SINCE 1993, COMMUNITY AWARENESS OF THE PLEEZCLENE SUPERFUND SITE HAS INCREASED DUE TO:

- *EPA's cleanup activities at the site*
- *EPA's community involvement efforts*
- *EPA's consistent well water sampling*
- *EPA's regular water filter maintenance*
- *Residents' redrilling of their water wells*

In 1988, EPA began to take a more active role in the cleanup activities at the site when the Nevaclene Corporation entered into a *consent decree* with EPA, in which it agreed to complete a facility investigation and corrective-measures study for the site. When the company failed to complete this study, EPA assumed the lead.

EPA transferred Nevaclene Corporation to the Fund-lead status in November 1993, allowing EPA to use Superfund monies to conduct extensive, long-term cleanup efforts to protect the health of the community, and to increase community involvement.

Residents state that their awareness of the Pleezclene Site has increased over the past three years. They attribute this to EPA's increased involvement at the site, specifically the combination of its remedial investigation and community involvement activities. However, some residents became aware of the site and its associated contamination when their wells ran dry and they were required to re-drill.

Overall, involvement with the affected community at the site remains minimal, and community knowledge of the site remains limited.

SECTION 2.2: SITE DESCRIPTION/LOCATION

Pleezclene Superfund Site occupies approximately 72,500 acres of relatively undeveloped coastal plain uplands, wetlands and estuary in the town of Generica. Pleezclene is on the western shore of the northern-most part of the Big Bay in southeastern Alpha County and southwestern Bravo County. Charlie County is directly across the Big Bay from Pleezclene (See map of the regional area on page 6).

The site is part of the Coastal Plains region and is drained by eight rivers and streams that empty into the bay. Pleezclene is bordered to the east and south by the Big Bay; to the west by Gun Falls State Park, the Brane Power Plant and residential areas; and to the north by residential areas. Several schools are very close to Pleezclene's boundaries.

The diverse habitats at Pleezclene support a variety of wildlife species. More than 40 mammalian species, 121 bird species and 39 reptile and amphibian species have been recorded at Pleezclene. Animals and birds at Pleezclene include red foxes, deer, falcons, hawks, and eagles. The installation provides habitat for as much as 17 percent of the area's winter population of bald eagles.

MAPS INSERTED HERE. MAPS SHOULD SHOW:

- *Location within the region*
- *Location within the community*
- *Actual site layout*

The aquatic sections of Pleezclene and the upper Big Bay represent extremely sensitive ecological areas. The upper portions of the Big Bay, including many major tributaries such as the Gun and Cush Rivers, at Pleezclene are critical spawning and nursery habitats for many recreationally and commercially important fish. Approximately 40 of the 50 fish species that occur as eggs or larvae in the upper Big Bay spawn in the waters of Pleezclene.

SECTION 2.3: SITE INSPECTIONS AND CLEANUP ACTIVITIES

After study, EPA determined that unsafe levels of TCE and other related volatile organic compounds were present in the Pinewoods development. In June 1995, EPA selected a cleanup plan to address the groundwater contamination. Nevaclene prepared a Community Relations Plan to address that area of the cleanup. Since that time, Nevaclene has replaced all water filters on the original nine wells and is promoting a working partnership with EPA.

SECTION 3.0: COMMUNITY BACKGROUND

SECTION 3.1: COMMUNITY PROFILE

Alpha County covers a land area of 440 square miles and is part of the Generica metropolitan area. Communities near Pleezclene in Alpha County include Abbytown, Beltair, Sedgewood and Hoppa.

The major regional population and industrial centers near Pleezclene include Bravo City, pop. 1 million (20 miles); Redlyn, pop. 500,000 (50 miles); Lexton, pop. 1.1 million (40 miles); and Upton, pop. 750,000 (75 miles).

The area around the site is a mix of commercial and residential. Boating, fishing and other water activities are popular in the counties closest to Pleezclene. Hunting also is a large recreational activity in both counties. The possible contamination of Alpha County's waterways and streams is a major issue to the community.

In the past decade, Alpha County has experienced significant growth. In 1990, the U.S. Bureau of the Census estimated the county population to be 182,132, a 25 percent increase in population since 1980. The Alpha County Department of Planning and Zoning estimates the 1995 population will be 209,130, a 15 percent growth since 1990. Areas experiencing particularly high growth during this period include Sedgewood, Hoppa, Abbytown, and Beltair.

The county's population distribution by age is as follows:

Under age 5	8.2%
5 - 19	21.7%
20 - 44	42.6%
45 - 64	19.3%
65 & over	8.2%

Of the total area population, approximately 65 percent are potentially affected by the Pleezclene site.

The residents of Alpha County basically fall into one of two well-defined groups. One group is composed of highly educated and relatively vocal individuals, most of whom are associated with the institutions of higher education located in close proximity to the Pleezclene site. The other group, which represents the majority of Alpha County residents, is composed of blue collar workers predominately employed in manufacturing (approx. 1/3), retail trade, construction, and service industries. More than 81 percent of county residents have at least a high school education, and 22 percent have a bachelor's degree or higher.

Approximately 20 percent of Alpha County residents are Hispanic in origin, speaking English as their second language. Translation services would be beneficial to them when receiving information circulated about the Pleezclene site.

Since its establishment in 1917, Nevaclene has expanded into a dominant county and regional economic force. The Alpha County Office of Economic Development lists Nevaclene as the county's largest employer. More than 70 percent of Nevaclene workers are Alpha County residents; in addition, Nevaclene provides housing for approximately 4,300 family members on its property. Alpha County's 3,793 businesses employ more than 53,000 workers; none of these businesses is affected by the site.

The county's public school system consists of 28 elementary schools, eight middle schools and nine high schools, with a total population of 36,000. The Pleezclene site directly affects 2 of these schools, while 8 are potentially affected. Also, there are 29 private schools (with a population of 12,000) in Alpha County; none of these schools is affected by the site.

SECTION 3.2: HISTORY OF COMMUNITY INVOLVEMENT

Due to Nevaclene Corporation's extended history as a regional source of employment, community members, as well as businesses and local leaders, consider Nevaclene a vital local resource. Nevaclene spends nearly \$1 billion annually on contractual services, supplies, materials, and equipment. In addition to its payroll and procurements, many other retail businesses rely on what is known as the "multiplier effect," i.e. every job at Nevaclene creates approximately two additional jobs in the community.

Workers at Nevaclene are active members in local church, community and civic organizations and help maintain communication with these groups. For example, Nevaclene Corporation volunteers assist students in Alpha and Bravo County schools through Nevaclene's tutorial program. Also, community members volunteer their time with on-site activities, such as the natural resource program. Activities such as these help promote two-way dialogue with the community.

Because Nevaclene has been part of the community since 1917, it is not uncommon for two or three family generations to have worked there. This results in strong community identity with, and loyalty to, Nevaclene. However, with increased urbanization, population growth, and industrial development, multiple-generation Nevaclene workers may decline. Alpha County residents are finding more job opportunities in other industries, and an emerging pattern of Alpha County residents working outside the county, in places such as Bravo City, is developing.

Due to its proximity to Bravo City and Lexton, Nevaclene events and operations often stimulate attention from newspapers and television stations that broadcast news to a large geographic area.

Residents of Alpha, Bravo and Charlie Counties share similar concerns about Nevaclene's activities. However, there are differences in how they rank their concerns, their information needs, and their level of involvement in the cleanup program.

Charlie County

Charlie County's dominant concern is the effect on Big Bay and the surrounding wildlife. Charlie County residents are also interested in being kept informed about the cleanup program, particularly if it might someday impact them directly. Many of the residents are just learning about the cleanup program and may become more involved in the future.

Because of the distance from Charlie County to Alpha County, it is difficult for Charlie County citizens to attend meetings held in Alpha County, particularly if they are in the evening. Almost 17 percent of Charlie County residents are over 65, and many prefer not to travel far at night.

An environmental information day, hosted by Nevaclene in May 1993, attracted approximately 15 residents. An availability session about the proposed cleanup plan, held in July 1994, drew no residents. Both sessions began in the afternoon to accommodate residents who prefer to attend meetings during the day. While attendance at these two meetings was fairly low, about 50 residents from Charlie County have requested to be included on the Pleezclene mailing list. About 75 residents (8 percent of those sent surveys) responded to Nevaclene's survey of community concerns and information needs.

Bravo County

Bravo County residents are equally concerned about the cleanup program. Many residents have only recently moved to the county and have become familiar with Nevaclene's past and current activities. Long-time residents feel they did not receive enough information or attention from Nevaclene in the past and, thus, have some mistrust over current information. Both new and long-time residents are highly interested in the cleanup program. Some Bravo County residents travel to Nevaclene meetings held in Alpha County, but most have expressed a strong desire for meetings to be held in their community. The area of Bravo County closest to the Pleezclene site is well-organized, with many

homeowners' or community associations. Residents depend upon them to distribute community information.

In 1993, Nevaclene began to expand its public involvement activities to include more Bravo County events. Nevaclene held or participated in many meetings and activities in Bravo County in the past three years, including:

- A. Meetings on proposed removal actions (6/17/92 and 6/19/93);
- B. Presentations on the cleanup to: Pinewoods Civic Association Coalition (12/21/93);
- C. Fellows Democratic Club (1/21/94); and Bravo Community Association (9/21/94).

In response to requests by Bravo County residents, in 1994 Nevaclene added a toll-free 800 number to its information line for residents of Bravo and Charlie County.

Alpha County

The level of interest among Alpha County residents varies. Residents in the Pinewoods development are personally affected and highly interested. The rest of the residents tend to be much more familiar with Nevaclene's activities through personal employment at Nevaclene or family and friends employed there.

Attendance at most Alpha County meetings and events tends to be low. However, this is not necessarily a direct function of interest. Many residents are unaware of changes that have occurred in Nevaclene's public information policies, particularly with respect to the environmental program. Residents unfamiliar with Nevaclene's openness regarding environmental activities may believe attending meetings will not be informative. Another contributing factor is the growth of single-parent and double-income families, which limits the amount of time available for attending public meetings. Also, many residents have expressed a dislike for public meetings and prefer to receive information in other ways. Nevaclene has held several meetings regarding the cleanup program:

- A. Big Bay Yacht Club (6/29/92);
- B. Alpha County Garden club (8/1/93).

Nevaclene has also held informal sessions in Alpha County, including Environmental Information Days at Sedgewood High School (4/16/94) and Abbyton High School (4/19/94). Nevaclene also hosted an information session for sport and commercial fishermen at the Gardenia Elementary School on September 29, 1994.

Nevaclene gets its best response when it participates in community events. Nevaclene has participated in the Alpha County Chamber of Commerce Business Expos at Alpha Mall (October 1994 and March 1995); the Alpha County Farm Fair (July 28 through July 31, 1994); and Generica State Department of the Environment's Envirojam (September 23, 1994). Nevaclene also set up a display on the cleanup program at the Sedgewood, Abbyton and Hoppa branches of the Alpha County Library in November 1994. These events allow residents to get information without having to go to a special meeting.

Many Alpha County residents and some elected officials expressed concern that extensive negative publicity will send the wrong message to leaders in Washington that could possibly result in Nevaclene's losing its defense work. Because of this, some residents see any involvement in the cleanup program as being negative and, therefore, do not openly participate. Also, some Alpha County residents feel that, since Nevaclene has highly qualified staff who are capable of addressing environmental issues, input from the community is not required.

Nevaclene Employees

Active involvement by employees at Nevaclene, through attendance at public meetings or other visible means, has been very low. However, when asked to complete an anonymous questionnaire on the cleanup program, there was a 39 percent response rate from employees. This is a high response rate for this type of survey and indicates the employee population is very interested in the cleanup program. People who work at Nevaclene may be reluctant to participate actively from fear of its having an adverse impact on their job.

SECTION 3.3: KEY COMMUNITY CONCERNS

EPA conducted personal interviews with 29 residents in the Pinewoods developments and other areas immediately adjacent to the site (during February and March 1996). The interviews allowed EPA to update residents on cleanup activities at the site and to gather information on residents' concerns with the site.

Through the interview process, EPA was able to determine the types of information residents want to receive and how EPA can best provide that information. Following the interviews, EPA analyzed the information provided by the residents, reviewed supplemental site files, and designed this community involvement plan for the Pleezclene Superfund Site.

The major concerns and questions raised were:

- ***Health Effects of Long-Term Exposure to TCE***

The most prevalent concern expressed by residents during the community interviews regarded the long-term health effects of exposure to TCE, particularly in light of the inconsistent water sampling and filter maintenance in the 1980s and early 1990s. Residents asked EPA's Community Involvement Coordinator for information about TCE, and acceptable levels of exposure for their children's health and well-being. Several residents emphasized the importance of immediate notification of any potential or imminent health threats associated with contamination from the site, and expressed concern that the contamination was neither fully characterized nor contained, making the potential TCE exposure uncertain.

- ***Lack of Public Information/Knowledge about the Site***

Many residents expressed their concern with the lack of information and knowledge about the groundwater contamination prior to EPA's taking control of cleanup activities at the site. Residents stated that Nevaclene Corporation, when it was responsible for sampling well water and for maintaining water filters installed to purify well water, inconsistently and infrequently carried out the sampling and maintenance procedures. In fact, some residents stated that they were completely unaware that their water was on a filtration system. Several residents stated that, prior to purchasing their houses, they were not informed by real estate agents about the groundwater contamination and water filtration system.

- ***Well Water Sampling and Filtration***

Many residents interviewed were concerned about Nevaclene Corporation's inconsistent well water sampling and filter maintenance in the 1980s and early 1990s. They stated that Nevaclene Corporation rarely, if ever, informed residents of scheduled samplings. In their favor, they did provide residents with a copy of their sampling results, although they never explained what the results meant. Interviewees also stated that Nevaclene Corporation infrequently replaced their water filters. Although these residents stated that they are more confident in the safety and quality of their water supply since EPA has taken control of the testing and filter systems, they also raised questions about the level of testing being conducted by EPA as compared to what Nevaclene had done, noting that Nevaclene's report seemed to contain a more extensive list of tested substances. Most residents found their sampling results, whether provided by Nevaclene Corporation or EPA, difficult to interpret and understand.

- ***Water Supply, Sink Holes, and Sedimentation***

A number of residents in the Pinewoods development have had problems with geological issues such as wells, sink holes, or sedimentation. Over the last three to four years, a number of residential wells went dry, several at the same time. Some residents also mentioned problems with sink holes or excessive sedimentation in their yards. Residents were concerned that there was a correlation between EPA's cleanup activities at the site, particularly the drilling of on-site monitoring wells, and their dried-up water supply, growing sink holes, and/or excessive sedimentation.

- ***Current Activities of the Nevaclene Corporation***

Community members requested information on the current operations and activities of the Nevaclene Corporation.

They expressed concern that Nevaclene could be operating in ways that would contribute to additional groundwater contamination. Several residents expressed their desire for Nevaclene Corporation to cease operations.

- ***Property Values***

Although residents were most concerned about their health and safety, they were also concerned about the proximity of their properties to a Superfund site, and the effect the groundwater contamination and filter systems would have on potential purchasers. Residents stated that the contamination associated with the site deflated the value of their property. One resident suggested that the Pinewoods development be placed on public water and sewer so that the contamination would not be an issue when placing a house on the market.

SECTION 3.4: EPA'S RESPONSE TO COMMUNITY CONCERNS

EPA held an information session on Thursday, May 5, 1996, to respond to the concerns and questions raised by residents during the community interviews. EPA staff available to address community members' concerns included: NAME, Remedial Project Manager; NAME, Toxicologist; NAME, Hydrogeologist; and NAME, Community Involvement Coordinator. NAME, Hydrogeologist with the U.S. Geological Services, was also available to answer questions. Throughout the information session, EPA staff responded to community concerns regarding long-term exposure to TCE, well water sampling and filtration, water supply, sink holes, sedimentation, and current activities of the Nevaclene Corporation.

Responding to residents' concerns about receiving immediate notification of any potential or imminent threats associated with contamination from the site, EPA affirmed its commitment to protecting the health and safety of the community surrounding the site. EPA will utilize fact sheets and the local media to notify residents immediately if there are changes in the concentration of contaminants.

Some residents expressed concern that EPA's sampling and analysis was less thorough than Nevaclene Corporation's, since their sampling results listed more chemicals and substances that had been analyzed. EPA explained to residents its methods for collecting and analyzing samples. They acknowledged that EPA's sampling method differs from that employed by the Nevaclene Corporation and went on to explain how, despite these differences in methodology, its testing is as inclusive as Nevaclene's.

Residents who had difficulty understanding the sampling results from the well water testing talked with EPA staff about the results. EPA explained to residents the significance of each of their sampling results. EPA also provided fact sheets on each of the contaminants identified in the residential groundwater. These fact sheets explained the chemical nature of the contaminant and the health effects associated with long-term exposure to it.

Regarding the problems with sink holes and sedimentation, many residents in Pinewoods expressed concern that there was a direct relationship between EPA's cleanup of the site and these disturbances. EPA explained to residents that the cleanup activities at the site did not include the regrading of soil or other activities that typically cause sink holes and sedimentation. EPA used a table top exhibit to demonstrate how none of the cleanup activities conducted at the site could have caused sink holes and sedimentation.

Responding to residents' concerns about the current operations of the Nevaclene Corporation and the potential for additional groundwater contamination, EPA explained that Nevaclene Corporation has a Hazardous Materials Permit with the Alpha County Fire Marshall's Office. Alpha County, therefore, is responsible for inspecting the facility to ensure compliance with the Fire Prevention Code and for monitoring Nevaclene's handling of hazardous materials.

SECTION 3.5: SUMMARY OF COMMUNICATION NEEDS

During the community interviews in February and March 1996, EPA and the residents also discussed the types of information residents want to receive about the site and the most effective ways for EPA to communicate that information. Residents indicated they want to be kept abreast of current and proposed cleanup activities at the site, the impact of these activities on the surrounding community, and any potential health effects of past or current activities at Nevaclene Corporation. All interviewed residents stated that fact sheets or flyers mailed directly to their homes is the most effective way for

EPA to communicate with the community. Residents also indicated that periodic public meetings would be an effective forum for EPA to relay information to the community and to respond to community concerns. Some residents stated that they would access information on the Internet.

SECTION 4.0: EPA'S COMMUNITY INVOLVEMENT PROGRAM

The overall goal of EPA's community involvement program is to promote two-way communication between citizens and EPA, and to provide opportunities to the community for meaningful and active involvement in the process. EPA will implement the community involvement activities described below. The following plan is based on the results of the community interviews described earlier; it addresses each issue that was identified as being important to the community.

SECTION 4.1: THE PLAN

ISSUE 1: INFREQUENT TESTING

- ◆ **Activity 1:** EPA will meet with the affected residents in a closed meeting to establish a testing cycle that is agreeable to them.
 - **Objective:** To provide the affected residents with peace of mind in regards to their safety and inform them of the acceptable levels.
 - **Method:** EPA will host this meeting in a location that is agreeable to the residents in question. The meeting will not be advertised; affected residents will be invited by EPA to attend. Upon determination, EPA will properly notify each resident to confirm their appointment prior to each testing.
 - **Timing:** EPA will hold this meeting within two weeks either side of the start of RI field work.

ISSUE 2: HEALTH EFFECTS OF LONG-TERM EXPOSURE TO TCE

- ◆ **Activity 2:** EPA will hold small group workshops for local residents. The site toxicologist will be present to offer a thorough discussion of this matter.
 - **Objective:** To provide the residents with information they can use and understand about any present or potential health threats associated with exposure to the contamination from the site.
 - **Method:** EPA will attempt to offer these workshops in private homes and work with individual residents who might be willing to host these sessions. Group size will be determined by the host, and EPA will ask the host to extend the invitations.
 - **Timing:** These workshops will be completed concurrent with the RI field work, probably during the first quarter of the new year.

ISSUE 3: UNDERSTANDING TEST REPORTS

- ◆ **Activity 3A:** EPA will hold a workshop for residents involved in the testing program. This workshop will provide education on interpreting the reports that the residents will receive following their testing.
 - **Objective:** To provide citizens with an opportunity to learn, first hand from EPA experts, how to read and interpret the results of their water tests.
 - **Method:** If the in-home sessions above were successful, EPA will use the same strategy here. If not, EPA will make arrangements as were used for the larger scheduled meeting.
 - **Timing:** This meeting will be scheduled for the week before testing is to begin.
- ◆ **Activity 3B:** EPA will include, with each report, a brief summary on how to read and interpret the report, as well as an explanation of the various ranges of results.
 - **Objective:** To provide the public with information they can understand, so that they will be able to read, interpret, and understand the significance of the reports from their water tests.
 - **Method:** The reports will be mailed only to the residents of the home to which the test results apply. EPA will prepare a basic review of the reports that will explain the report format, content, and the significance of the ranges of results. This insert will accompany every report for the duration of the project.

- **Timing:** EPA will mail reports to affected residents as soon as the data has been QA/QCd. However, in those instances where there appears to be imminent danger to the resident, EPA will provide a preliminary report, with the caveat that the data has not been QA/QCd.

ISSUE 4: WATER SUPPLY, SINK HOLES, SEDIMENTATION

- ◆ **Activity 4:** EPA will hold small group workshops with a hydro-geologist present.
 - **Objective:** To educate the community and provide them with information that they can understand on the nature of ground water relative to the geology of the area and their specific problem.
 - **Method:** If the small group sessions in private homes work, EPA will use that method again, and hold these workshops at the homes of local residents. The site Hydro-geologist will be present to work closely with residents, make a presentation, and answer their questions.
 - **Timing:** EPA will hold these workshops after the RI field work has been completed, probably throughout the 3rd quarter of the year.

ISSUE 5: KEEPING THE PUBLIC INFORMED AND UP TO DATE

- ◆ **Activity 5A:** Provide a toll-free “800 number” that citizens can call for the latest information.
 - **Objective:** To empower citizens to get the latest information available when they want it, rather than having to wait for a meeting or a fact sheet, and without incurring any cost. This will ensure that everyone interested in the site is as current as possible, which will help control rumors and mistrust.
 - **Method:** EPA will activate the 800 number and announce it in a mailing to the site mailing list, and publish it periodically in the local papers and in all fact sheets. The CIC will record a brief message weekly; this message will recap what was done the preceding week, announce plans for the coming weeks, and announce any major milestones met or anticipated.
 - **Timing:** The line will be operational before the RI field work begins.
- ◆ **Activity 5B:** Open a store-front information office in the community.
 - **Objective:** To provide the residents with another easy-to-use source of reliable information.
 - **Method:** EPA will lease a small store-front office in the community, and will staff it ____ (either with an EPA person or a contractor) ____ days a week (whatever is appropriate for this site). This person will be knowledgeable and able to answer general questions about the site (site activities, site progress, work schedules, etc.) and generic Superfund issues; (s)he will record technical questions, along with the person’s name and phone number, and refer them to the Site Team for answers.
 - **Timing:** The office will be open by the end of the first week of RI field work.
- ◆ **Activity 5C:** Periodic calls to local officials and other opinion leaders.
 - **Objective:** Keep local leaders informed so that they can serve as an additional conduit of information to the local residents; and to gather information about developments in the community that could affect progress, trust, etc. or that may require CIC attention.
 - **Method:** The CIC will regularly call the (mayor/borough manager/selectmen/ Council members/ presidents of affected homeowners’ associations, etc) and brief them on site activities. The CIC will irregularly call local opinion leaders and key residents to give them an update and to find out what is happening in the community.
 - **Timing:** These calls will start the week after the RI field work starts and will continue throughout the process.
- ◆ **Activity 5D:** Maintain a complete and accurate mailing list.
 - **Objective:** To facilitate the distribution of site specific information to everyone who needs or wants to be kept informed about the site.
 - **Method:** EPA will generate a mailing list that includes all residences contiguous to the site and/or in known or suspected paths of migration, as well as all local officials. EPA will work with the local tax collector’s office, local Post Master, or any other resource to generate this list; if that help is not forthcoming, the CIC will use a computer software program to identify all streets and addresses in the target area and will mail to the residence. EPA will also solicit interested parties via fact sheets, newspaper articles, public meetings, public availabilities, etc.

- **Timing:** EPA will begin working on this mailing list immediately and will review/revise it at least quarterly to keep it current.
- ◆ **Activity 5D:** Other activities to include in this section, using the same format, are fact sheets; technical summaries; press releases; public service announcements; presentations to local schools, civic and service clubs, etc; designating a site spokesperson/CIC; responding promptly to inquiries maintaining the repositories; providing TAG and CAG information.

ISSUE 6: PROVIDE ADEQUATE AND MEANINGFUL OPPORTUNITIES FOR COMMUNITY INVOLVEMENT.

- ◆ **Activity 6A:** Provide information to and invite comment from the public.
 - **Objective:** To ensure that residents are not only informed, but have an opportunity to help shape the decisions being made in their community. Also, to ensure that residents, even if they choose to not participate, realize that they could have been involved had they chosen to.
 - **Method:** EPA will release the following information/draft documents to the mailing list and invite comment: list of PRPs, list of known contaminants, draft Community Involvement Plan, draft summary of test results (not individual tests) and initial interpretation, preliminary findings of the RI and a list of possible remedies likely to be considered, preliminary findings of the FS and a brief summary of the leading contender for the proposed remedy, and preliminary plans for implementation and construction. In addition, EPA will invite the public to two meetings during the design stage, one at the 75 percent point and one at the 90 percent point, at which it will present the progress made to date and invite comment.
 - **Timing:** EPA will conduct these activities as the information noted above becomes available. Residents will have two weeks to submit comment; however, comments received after the deadline will, to the extent possible, be considered.
- ◆ **Activity 6B:** Conduct informational Public Availabilities
 - **Objective:** To give residents an opportunity to interact with EPA’s Site Team.
 - **Method:** EPA will hold informal availabilities, or windows of opportunity, during which residents may come anytime during established times and talk one-on-one with specific members of the Site Team.
 - **Timing:** EPA will hold these sessions during each comment period mentioned above.
- ◆ **Activity 6C:** Other activities here would include: Release the Proposed Plan and hold a Public Meeting to discuss it, provide formal transcript of the meeting, support formation of TAG and/or CAG groups, prepare the responsiveness summary, revise the CIP, conduct periodic (specify timing — weekly, bi-weekly, etc.) conference calls with key stakeholders including: local leaders (official and unofficial), the media, TAG/CAG leaders, RPM, etc.

SECTION 4.2: PROJECTED SCHEDULE FOR COMMUNITY INVOLVEMENT ACTIVITIES

[See Attachment 1: Community Involvement Plan Template, Attachment 1, Section 4.2]

APPENDICES A-J

[See Attachment 1: Community Involvement Plan Template, Attachment 1, Appendices A-J]

