



United States  
Environmental Protection  
Agency

# **COMMUNITY INVOLVEMENT PLAN**

**FOR THE**

## **JACKSON CLEANERS SITE**

**YPSILANTI, MICHIGAN  
MAY 2021**

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## *INTRODUCTION*

In 1980, the United States Congress enacted the **Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)**, also called **Superfund**. CERCLA authorizes the U.S. Environmental Protection Agency to investigate and respond to **hazardous substance** releases that may endanger public health and the environment. Congress amended and reauthorized the Superfund law in October 1986 as the **Superfund Amendments and Reauthorization Act**. If the site poses an immediate threat to public health or the environment, EPA can intervene with an **emergency response action**.

EPA prepared this **community involvement plan** to inform, engage and support the **community** affected by the Jackson Cleaners site located in Ypsilanti, Michigan. Our **community involvement** effort is committed to promoting effective and meaningful communication between the **public** and the Agency. We want to make sure the community's current concerns and information needs are considered as activities at the site progress.

This **CIP** describes EPA's plan for addressing concerns and keeping residents informed and involved in investigation and **cleanup** activities at the site. We will use this document as a guide to involve and communicate with residents, businesses and community organizations. We used several information sources to develop this plan, including research and discussions with the public.

### **EPA's community outreach objectives:**

- Assist the public in understanding EPA's decision-making process and the community's role during the investigation and cleanup.
- Give the public accessible, accurate, timely and understandable information about the project as it moves forward.
- Reflect, respect and fully consider community concerns, questions, public input and information needs.

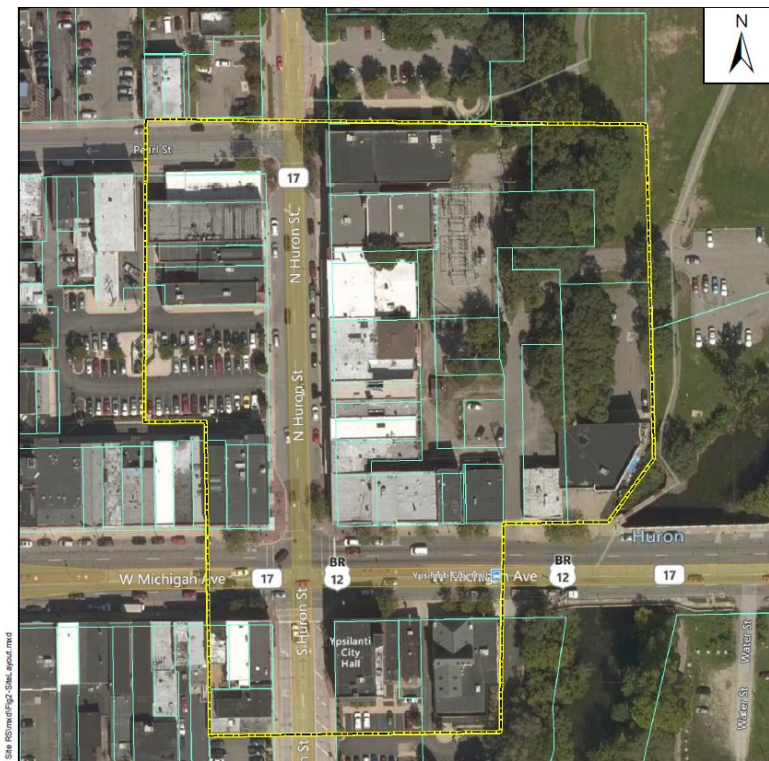
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*(Words in **bold** are defined in Appendix A.)*

## SITE LOCATION

The Jackson Cleaners site consists of a contamination plume located in a mixed residential and commercial neighborhood in Ypsilanti, Washtenaw County, Michigan. Based on current data, EPA has established the site boundaries as Pearl Street to the north; Riverside Park and the Huron River to the east; North Huron Street and area beyond to the west; and Michigan Avenue and area beyond to the south. Given that the site area is serviced by Ypsilanti city water and there are no known drinking water wells in the area, EPA is confident that the contamination is not affecting drinking water.



## SITE BACKGROUND

In 2019, an investigation of the area was initiated by Michigan Department of Environment, Great Lakes and Energy. During that investigation, elevated levels of **tetrachloroethylene**, (commonly known as **PCE**), and breakdown products including **trichloroethylene** (commonly known as **TCE**) were detected in the groundwater, soil, soil vapor, and indoor air at multiple buildings. These chemicals are also known as **volatile organic compounds** or **VOCs**. Because of their chemical makeup, VOCs can evaporate into the air even in low temperatures and are prone to cause an environmental problem called **vapor intrusion**. The unsafe gases can come from the polluted soil and contaminated **groundwater** below the surface. These vapors seep, or intrude, into homes and other buildings through structural cracks. PCE and TCE can cause health issues such as headaches and dizziness. Long-term exposure to these chemicals may cause cancer. In February 2020, EGLE requested assistance from EPA to address the public health hazard related to vapor intrusion at the Jackson Cleaners site.

On September 3, 2020, EPA signed an action memorandum to address the PCE and breakdown product **contamination** at the site. Prior to EPA's involvement, EGLE determined that levels of PCE and/or TCE in indoor air at several buildings presented an immediate human health risk. As an interim measure, EGLE placed carbon air purifying units, commonly referred to as APUs, in several buildings. EPA resampled the indoor air at these locations to ensure that APUs were effectively controlling indoor air contamination while more permanent action was being planned. EPA subsequently installed sub-slab remediation systems at buildings that have previously been documented to be impacted by vapor intrusion and where property owners granted permission to do so.

EPA also implemented a sampling/resampling plan to evaluate other buildings within approximately 100 feet of known sub-surface contamination that had not yet been sampled or where conditions could have potentially changed since prior sampling. EPA will continue outreach efforts to properties that are at high risk of **contamination**, to encourage property owners and occupants to allow us to sample.

### *COMMUNITY INVOLVEMENT GOALS AND ACTIVITIES*

When establishing the objectives for a site-specific community involvement program, we consider several factors, including federal requirements and EPA policies that assess the nature and extent of known or perceived site **contaminants**, as well as known community concerns and requests.

To be effective, our community involvement program is designed to meet the community's need to be informed, give information in a timely manner, and accommodate the community's interests and its willingness to participate in the decision-making processes. We must also share information in the language(s) the public can understand.

To meet the needs of the community, respond to information obtained and meet federal requirements, we have established the following objectives for our community involvement efforts:

- Enlist the support, coordination and involvement of local officials and community leaders.
- Enlist the support, coordination and involvement of the Michigan Department of Environment, Great Lakes and Energy, the Michigan Department of Health and Human Services, the city of Ypsilanti, and Washtenaw County.
- Monitor citizen interest in the site and respond accordingly.
- Keep the community well-informed of ongoing and planned site activities.
- Explain technical site activities and findings in an understandable format for residents.
- Get public input on key decisions.
- Change planned activities, where warranted, based on community input.
- Update EPA's website regularly and provide useful information on it for the community.
- Update city and state officials on a periodic basis even if no activities are occurring at the site.

- Hold **public meetings**, when necessary, within the community to give all residents an opportunity to attend.

EPA has or will put in place the activities described on the following pages to meaningfully and actively engage the community in decisions regarding the investigation and cleanup of the Jackson Cleaners site. The following plan is intended as opportunities for communication between the community and EPA and to address key concerns and questions raised during public outreach.

#### Specific Community Involvement Activities

To meet federal requirements and to address community concerns and questions described in the Community Concerns section, EPA has conducted (or will conduct) the activities described below. Through these activities, it is our goal to inform, involve and engage the community during site cleanup decisions and efforts. As the needs of the community change, we will modify the community involvement strategies to answer them.

- Maintain point of contact: Ruth Muhtsun is the EPA Community Involvement Coordinator and fields general questions for the site. EPA's **On-Scene Coordinator**, or **OSC**, for the site is Betsy Nightingale who serves as the project manager and another point of contact for community members about the site
- We will include current contact information for the project staff on all written and electronic information and will notify the community of any contact information changes.

### *COMMUNITY PROFILE*

According to Wikipedia, "Ypsilanti is a city in Washtenaw County in the U.S. state of Michigan, perhaps best known as the home of Eastern Michigan University. As of the 2010 census, the city's population was 19,435. The city is bounded to the north by Superior Township and on the west, south, and east by Ypsilanti Township" ([https://en.wikipedia.org/wiki/Ypsilanti,\\_Michigan](https://en.wikipedia.org/wiki/Ypsilanti,_Michigan)).

The Ypsilanti Convention and Visitors Bureau reports that "Ypsilanti", named after Greek war hero Demetrius Ypsilanti, has a trendy community vibe and a fresh arts scene. "Ypsi", as it's affectionately known, has a rich history, which shines through in its vibrant shopping, dining, and entertainment scenes – and is inspiring a resurgence of visitors from near and far. Two main districts, Downtown and Depot Town, are historic areas infused with innovative, bohemian, locally driven businesses. Sometimes overlooked because of its more famous neighbor Ann Arbor, Michigan, Ypsilanti has its own inimitable, groovy, authentic ambiance worthy of a weekend getaway" (<https://www.ypsireal.com/>).

EPA's screening of area surrounding the site using EPA Region 5's EJ Screen Tool indicated that there is a high potential for EJ concerns at this location.

## *CHRONOLOGY OF COMMUNITY INVOLVEMENT*

On September 8, 2020, EPA initiated the removal action at the site. During that kickoff week, staff drafted and distributed the site emergency contingency plan to the local fire and police departments, the state, county, and the city. The team canvassed the neighborhood around the site to distribute a postcard about the cleanup and answer any questions that the members of the public had about the planned work.

Since the cleanup was initiated, much of the work at this site involved frequent communication with area building owners and tenants to arrange sampling of the buildings, share sampling results and install mitigation systems in buildings where needed.

In February 2021, EPA distributed a postcard inviting the community to participate in community involvement interviews. The team distributed this postcard to properties within the site area but did not receive any requests for interviews.

Since the removal action began, EPA has issued regular project update reports to stakeholder agencies and has held regular update calls about the site with the state, county, and the city.

## *COMMUNITY CONCERNS*

EPA has not conducted formal community interviews to date. However, several concerns and issues were presented during canvassing and meetings with community organizations. Below are some of the most frequently raised topics.

### Human Health

The biggest concern shared by the community is the risk that site contaminants pose to human health. There were numerous questions regarding the effects of exposure, symptoms and treatment if exposed to pollution. Also, while explaining the process of vapor intrusion, many residents were concerned their drinking water may be polluted as well. It has been clarified among the community that the underground water that has been contaminated is not the same as the drinking water supplied by their municipality. EPA confirmed that no buildings in the study area were using water not serviced by the city.

### Historic Preservation

This site is located within a nationally and a locally designated historic district. Section 106 of the National Historic Preservation Act, or NHPA, of 1966 requires that federal agencies take into account the effects of their undertakings on historic properties. It also requires federal agencies to consult with the State Historic Preservation Officer, or SHPO, regarding the undertakings or actions by or on behalf of a federal agency that has the potential to affect historic properties, with some exceptions for emergency situations.

EPA consulted with the City Of Ypsilanti Historic District Commission during their meeting October 27, 2020. EPA proposed mitigation and discussed the project with the Commission during a presentation regarding the site. The Commission indicated they agreed with going

forward with the planned mitigation and requested EPA use black sub-slab depressurization piping for mitigation systems installed as part of the project.

On October 16, 2020, EPA's contracted historian submitted a Section 106 consultation request application including information about the proposed mitigation work and potential for adverse effects to Michigan's SHPO. On October 30, 2020, EPA received a response from Michigan's SHPO, which stated that based on the information provided for their review, SHPO concurs with the determination of EPA that the effects of the proposed undertaking do not meet the criteria of adverse effect [36 CFR § 800.5(a)(1)]. Therefore, the project will have no adverse effect [36 CFR § 800.5(b)] on the Ypsilanti Historic District, which is listed in the National Register of Historic Places. EPA is requested to notify the office immediately if the scope of work changes in any way or if artifacts or bones are discovered.

## APPENDIX A

### GLOSSARY – INITIALS – ACRONYMS

**CERCLA.** See Comprehensive Environmental Response, Compensation and Liability Act.

**CIC.** See Community Involvement Coordinator.

**CIP.** See Community Involvement Plan.

**Cleanup.** Actions taken to deal with a release or threat of release of a hazardous substance that could affect humans and/or the environment. The term “cleanup” is sometimes used interchangeably with the terms “remedial action,” “remediation,” “removal action,” “response action,” or “corrective action.”

**Community.** An interacting population of various types of individuals in a common location; a neighborhood or specific area where people live.

**Community Engagement.** The process of involving communities in all phases of the cleanup process. Communities are asked to provide input on how the cleanup will be conducted and how it may affect community plans and goals. See also Community Involvement.

**Community Involvement.** The term used by EPA to identify its process for engaging in dialogue and collaboration with communities affected by Superfund site. EPA's community involvement approach is founded in the belief that people have a right to know what the Agency is doing in their community and to have a say in it. Its purpose is to give people the opportunity to become involved in the Agency's activities and to help shape the decisions that are made.

**Community Involvement Coordinator.** The EPA official whose lead responsibility is to involve and inform the public about the Superfund process and response actions in accordance with the interactive community involvement requirements set forth in the National Oil and Hazardous Substances Pollution Contingency Plan.



**Community Involvement Plan.** A plan that outlines specific community involvement activities that occur during the investigation and cleanup at the site. The CIP outlines how EPA will keep the public informed of work at the site and the ways in which residents can review and comment on decisions that may affect the final actions at the site. The document is available in the site's information repository maintained by EPA. The CIP may be modified as necessary to respond to changes in community concerns, information needs and activities.

**Comprehensive Environmental Response, Compensation, and Liability Act.** A federal law passed in 1980 and modified in 1986 by the Superfund Amendments and Reauthorization Act. Commonly known as Superfund, CERCLA is intended to protect people's health and the environment by investigating and cleaning up abandoned or uncontrolled hazardous waste sites. Under the program, EPA can either:

- Pay for site cleanup when parties responsible for the contamination cannot be located or are unwilling or unable to do the work; or
- Take legal action to force parties responsible for site contamination to clean up the site or pay back the federal government for the cost of the cleanup.

**Contaminant(s).** Any physical, chemical, biological, or radiological substance or matter that has an adverse effect on air, water, or soil.

**Contamination.** Introduction into water, air and soil of microorganisms, chemicals, toxic substances, wastes or wastewater in a concentration that makes the medium unfit for its next intended use. Also applies to surfaces of objects, buildings, and various household use products.

**Emergency Response Action.** Refers to a short-term cleanup conducted by EPA to prevent, minimize, or mitigate immediate threats to human health and the environment.

**Environmental Justice.** An Executive Order issued by President Clinton that requires federal agencies to ensure the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations and policies. Fair treatment means no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations or policies.

**Groundwater.** Underground supplies of fresh water.

**Hazardous Substance(s).** Any material that poses a threat to human health and the environment. Typical hazardous substances are toxic, corrosive, ignitable, explosive, or chemically reactive. Any substance designated by EPA to be reported if a designated quantity of the substance is spilled in the waters of the United States or is otherwise released into the environment.

**Hazardous Waste.** Byproducts that can pose a substantial or potential hazard to human health or the environment when improperly managed. Hazardous wastes usually possess at least one of four characteristics (ignitability, corrosivity, reactivity or toxicity) or appear on special EPA lists.

**Plume.** A plume is a visible or measurable discharge of a contaminant from a given point of origin. It can be visible or thermal in water, or visible in the air as, for example, a plume of smoke.

**OSC.** See On-Scene Coordinator

**On-Scene Coordinator.** Federal officials responsible for monitoring or directing responses to all oil spills and hazardous substance releases reported to the federal government. OSCs coordinate all federal efforts and provide support and information to local, state, and regional responders.

**Public Meeting.** Formal public sessions that are characterized by a presentation to the public followed by a question-and-answer session. Formal public meetings may involve the use of a court reporter and the issuance of transcripts. Formal public meetings are required only for the proposed plan and Record of Decision amendments.

**Public.** The community or people in general or a part or section of the community grouped because of a common interest or activity.

**Superfund Amendments and Reauthorization Act.** Modifications to the Comprehensive Environmental Response, Compensation and Liability Act, enacted on Oct. 17, 1986.

**Superfund.** The program operated under the legislative authority of CERCLA that funds and carries out EPA solid waste emergency and long-term removal and remedial activities. These activities include establishing the National Priorities List, investigating sites for inclusion on the list, determining their priority and conducting and supervising cleanup and other remedial actions.

**TCE.** See Trichloroethylene.

**Trichloroethylene.** A chemical that is used as a solvent to remove oils and grease from metal products and is found in adhesives, paint removers, typewriter correction fluids and spot removers. TCE is colorless liquid with an odor similar to ether and is a manufactured substance that does not occur naturally in the environment. It minimally dissolves in water and can remain in groundwater for a long time. TCE evaporates from surface water and soil, although it evaporates less easily from soil. Exposure from TCE is most commonly through breathing air that has TCE vapors, drinking or showering in contaminated water, or direct contact with contaminated soil. Long-term exposure to this family of chemicals is suspected of causing cancer, as well as problems of the liver and weakening of the immune system. More information can be found in the fact sheet in Appendix F on the following website:  
[www.atsdr.cdc.gov/toxfaqs/tfacts19.pdf](http://www.atsdr.cdc.gov/toxfaqs/tfacts19.pdf).

**Tetrachloroethylene.** A chemical that is widely used for dry cleaning of fabrics and for metal-degreasing. It is also used to make other chemicals and is used in some consumer products. Other names for this chemical include perchloroethylene, or PERC, PCE, and tetrachloroethene. Much of the tetrachloroethylene that gets into water or soil evaporates into the air. High concentrations of tetrachloroethylene particularly in closed, poorly ventilated areas can cause dizziness, headache,

sleepiness, confusion, nausea, difficulty in speaking and walking, unconsciousness, and death. Irritation may result from repeated or extended skin contact with it. These symptoms occur almost entirely in work or hobby environments when people have been accidentally exposed to high concentrations or have intentionally used tetrachloroethylene to get a “high.” More information can be found in the fact sheet in Appendix F on the following website:  
[www.atsdr.cdc.gov/toxfaqs/tfacts18.pdf](http://www.atsdr.cdc.gov/toxfaqs/tfacts18.pdf)

**Vapor Intrusion.** This occurs when underground pollutants release chemical vapors that travel up through the soil and accumulate beneath building foundations. Air in the building becomes polluted when vapors enter through cracks or holes in foundations and crawl spaces.

**VOCs.** See Volatile Organic Compounds.

**Volatile Organic Compounds.** A type of organic compound that tends to change from a liquid to a gas at low temperatures when exposed to air. As a result of this tendency, VOCs disappear more rapidly from surface water than from groundwater. Since groundwater does not come into contact with air, VOCs are not easily released and can remain in groundwater that is being used for drinking water, posing a threat to human health. Some VOCs are believed to cause cancer in humans.