



Viburnum Trend Lead Haul Roads, Operable Unit (OU) 02 – St. Joe Minerals Corp., City of Viburnum Superfund Site **COMMUNITY INVOLVEMENT PLAN**



**2021
June**

THE COMMUNITY

This section provides a brief introduction to the site and community, and identifies issues and concerns raised during the community survey.

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THE COMMUNITY INVOLVEMENT ACTION PLAN

This section provides EPA's plan for communicating and engaging with the community. It also describes how EPA will address the issues and concerns identified in the interviews. The Community Involvement Plan relies on tools and techniques that EPA has developed over the years at hundreds of Superfund sites.

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APPENDIX

- Superfund Removal Process
- Community Technical Assistance Resources
- Site Reuse and Redevelopment
- EPA Contact Information
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- Acronyms and Abbreviations

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INTRODUCTION

The goal of this Community Involvement Plan (CIP) is to encourage and facilitate community engagement throughout the Viburnum Trend Lead Haul Roads, Operable Unit (OU) 02 – St. Joe Minerals Corp., City of Viburnum Superfund Site (site) cleanup. The CIP describes how EPA will involve the community and address local needs during the Superfund process. The U.S. Environmental Protection Agency (EPA) and the community will work together by using the tools described in this plan. Active public involvement is crucial to the success of any project. EPA's community involvement activities at the site are designed to inform the public of all cleanup activities and include the community in the decision-making process.

EPA defines the "community" as those people and entities who have an interest in or are affected by the site. EPA also recognizes that other stakeholders, including local, state and federal agencies, may have an interest in the site. This CIP is based on a series of community interviews conducted from April 2021 to May 2021 with the affected community and stakeholders, in accordance with EPA's Superfund community involvement and cleanup guidance. The CIP is a "living document," meaning that it can be updated or revised over the course of site cleanup to reflect long-term changes in the community.

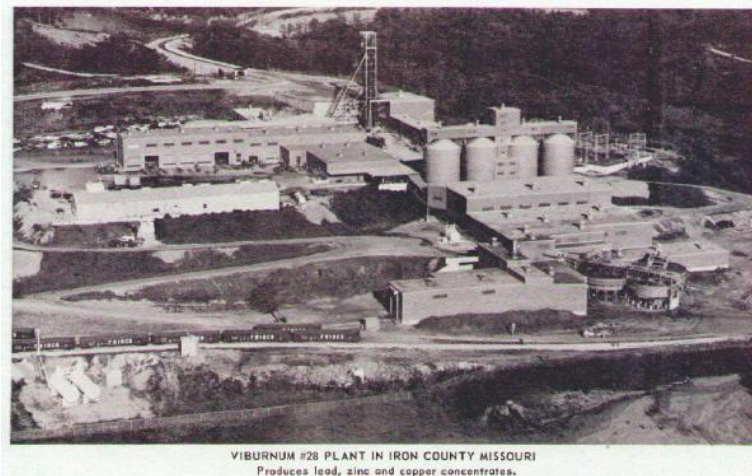
Community Involvement at the Viburnum Trend Lead Haul Roads, Operable Unit (OU) 02 – St. Joe Minerals Corp., City of Viburnum Superfund Site

Active and participatory community involvement is an important part of the cleanup process. It is also regulated under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), also known as "Superfund." This CIP follows community involvement requirements in the Superfund Amendment and Reauthorization Act of 1986 (SARA) Section 117 and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) Section 300.430. EPA's Community Involvement Program is designed to facilitate participation of community members throughout the cleanup process, including the investigation phase and the remedy selection phase. EPA works closely with state and local agencies to provide community involvement throughout the Superfund process.

THE COMMUNITY

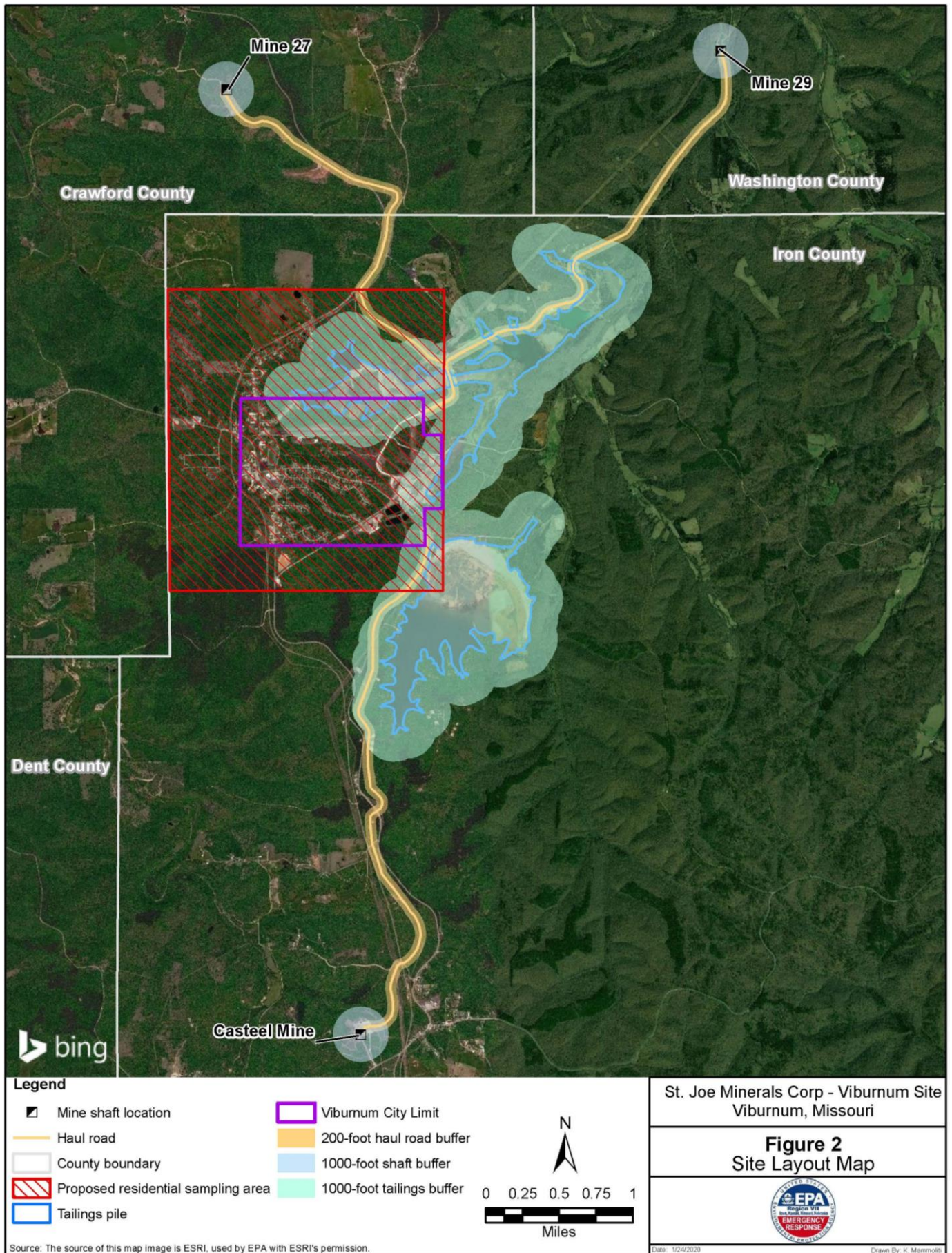
Site Overview

The site is in northwestern Iron County, with smaller portions within Crawford and Washington counties, in southeastern Missouri. The site is in part of what is commonly known as the New Lead Belt mining district, or Viburnum Trend, where lead production began around 1960. The Doe Run Resources Corporation – Viburnum Division (formerly St. Joe Minerals Corp. – Viburnum) is in and near the city of Viburnum. The Viburnum Division includes four mines where ore was brought to the surface. During construction, development, and early operation of these mines, it was not uncommon for lead-contaminated materials, such as tailings and/or poor rock, to be used for construction materials in the building of Viburnum, which was done by the St. Joe Minerals Corp. to support mining operations. As a result of mining-related activities that have occurred in and around the city, lead and lead compounds have been released into the environment in quantities that present a risk to public health and welfare.



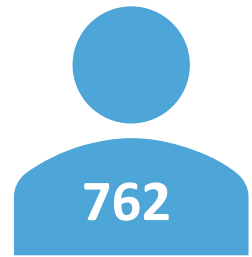
The site includes any residential property: 1) within the city of Viburnum, Missouri, or within an approximate half-mile buffer of the city limits; 2) within 200 feet of the edge of any haul road from the city of Viburnum to the 27, 29, or Casteel mines; 3) within 1,000 feet of the mine head frames of the 27, 29, and Casteel mines; and 4) within 1,000 feet from the edge of all Doe Run and St. Joe Minerals Corp. mine tailings piles. *A site map provided on the next page depicts the approximate site boundaries.* EPA's Superfund Lead-Contaminated Residential Sites Handbook defines "residential" as an area with high accessibility to sensitive populations, and includes properties containing single- and multi-family dwellings, apartment complexes, vacant lots in residential areas, schools, day care centers, playgrounds, parks, greenways, and other areas where children may be exposed to contamination. "Sensitive populations" are defined in EPA guidance documents as children 72 months or younger and pregnant women. Residential properties eligible for cleanup are those found to have an area with lead concentrations of 400 parts per million (ppm) or greater in the top 6 inches of soil or gravel.

EPA identified Doe Run Resources Corporation, or Doe Run, as the Potentially Responsible Party (PRP) responsible for the lead contamination found at this site. Beginning in 2005, EPA and Doe Run entered into an agreement for Doe Run to conduct a Preliminary Assessment/Site Inspection (PA/SI) of the site to identify lead-contaminated properties. The PA/SI determined that over 200 residential properties were eligible for cleanup. Doe Run completed cleanup at 105 of those properties from 2007 to 2018 under a time-critical removal action, and the remainder of the properties were to be addressed under a non-time-critical removal action. Due to extenuating circumstances, EPA and Doe Run were unable to come to an agreement on an action for cleanup at the remaining properties. Therefore, EPA conducted a review of all site-related data and determined that further assessment was needed to ensure that all eligible residential properties had been accounted for. EPA conducted their assessment from November 2020 to January 2021 and identified 86 residential properties. Of those 86 properties, EPA determined that 30 of them warranted a time-critical removal action due to either high concentrations (greater than 1,200 ppm) of lead in surface soil or the presence of a sensitive population at a property with an area with lead concentrations of 400 ppm or greater in surface soil. EPA began this time-critical removal action in April 2021. It is anticipated that the remaining 56 properties will be addressed during a future non-time-critical removal action.



About the Community

The area surrounding Viburnum has been home to settlers including hunters, trappers and farmers since the early 1800s. The vast supply of virgin timber and discovery of minerals like iron and lead in the Viburnum area attracted a group of approximately 12 people to form a community by the late 1870s. This small community maintained its presence in the area until the early 1960s, when the St. Joe Minerals Corp. discovered rich deposits of lead ore in the New Lead Belt, where Viburnum is located. To support the mining operations, St. Joe Minerals Corp. developed the area to include residential housing and buildings to support business. The city of Viburnum was incorporated in 1967 and by 1975 had established a school district and businesses to support a thriving community of over 850 people. After several corporate mergers, the Doe Run Resources Corporation took over mining operations in the Viburnum area in the 1980s. Today, Viburnum continues as a successful, small community of approximately 760 residents.



2019 U.S. Census estimated population of Viburnum

Environmental Justice

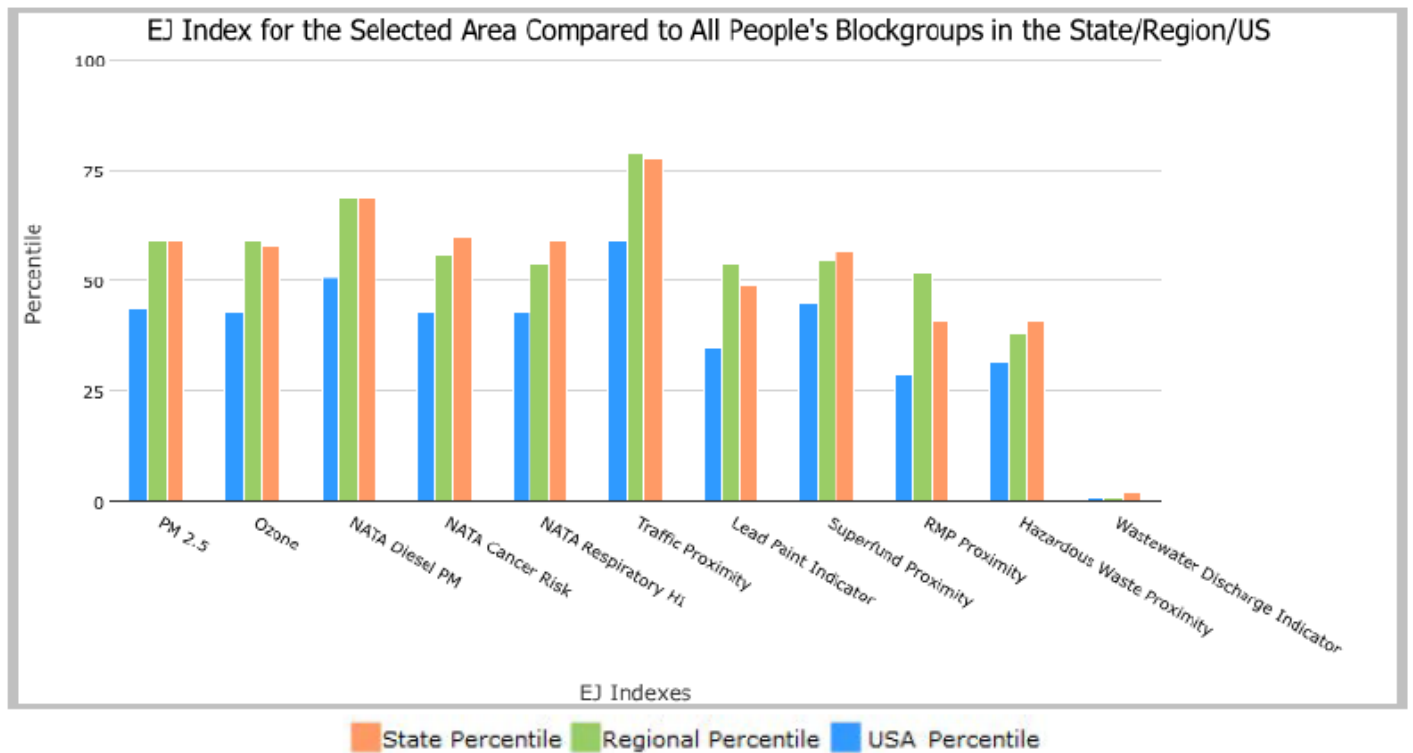
Environmental Justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin or income, with respect to the development, implementation and enforcement of environmental laws, regulations and policies.

EPA Region 7 programs collaborate closely to make sure that underserved, low-income, and tribal communities facing disproportionate environmental risks have opportunities for meaningful participation in environmental decision-making. Region 7 also coordinates closely with EPA Headquarters and states to support initiatives that provide all people living near Superfund sites with technical assistance, training opportunities, and other services. EPA has a variety of environmental justice resources available at www.epa.gov/environmentaljustice, including:

- [Environmental Justice Collaborative Problem-Solving \(CPS\) Cooperative Agreement Program](#) provides funding for eligible applicants for projects that address local environmental and public health issues in an affected community. The program assists recipients in building collaborative partnerships to help them understand and address environmental and public health concerns in their communities.
- [Environmental Justice Small Grants Program](#) supports and empowers communities working on solutions to local environmental and public health issues. The program helps communities understand and address exposure to multiple environmental harms and risks.

EJSCREEN

EJSCREEN is an environmental justice mapping and screening tool. It uses environmental indicators for a community to show potential exposures and demographic factors to show potential susceptibility. An EJSCREEN analysis for the site in 2021 found environmental justice concerns in the surrounding community; 10 of the 11 indicators were at the 25th percentile or above, compared to the rest of the United States and the rest of the state. The EJSCREEN printable standard report, including the chart displaying the 11 EJ Indexes and the state, regional and national percentiles, is shown on the next page. Please contact Monica Espinosa, Environmental Justice Program Specialist, to address any EJ concerns at 913-551-7541 or toll-free at 1-800-223-0425. For more information, visit: www.epa.gov/ejscreen.



EJSCREEN Quick Facts

To summarize how environmental indicators and demographics come together in the same location, EJSCREEN uses EJ Indexes. EJSCREEN has 11 EJ Indexes that reflect the 11 environmental indicators below. In the EJ Indexes, environmental indicators are combined with information about the low-income and minority population in a Census block group. EJSCREEN presents results in terms of percentiles, allowing the community to be compared to the rest of the state, EPA Region, or nation.

- National Scale Air Toxics Assessment (NATA) Air Toxics Cancer Risk
- National Scale Air Toxics Assessment (NATA) Respiratory Hazard Index
- National Scale Air Toxics Assessment (NATA) Diesel Particulate Matter (PM)
- Particulate Matter (PM 2.5)
- Ozone
- Lead Paint Indicator
- Traffic Proximity and Volume
- Proximity to Risk Management Plan (RMP) Sites
- Proximity to Treatment Storage and Disposal (Hazardous Waste) Facilities
- Proximity to National Priorities List (NPL) Sites (Superfund)
- Wastewater Discharge Indicator

Our Partners

Our partners include the Missouri Department of Health and Senior Services, Missouri Department of Natural Resources, Agency for Toxic Substances and Disease Registry, city of Viburnum, and Iron County Health Department.

Key Contacts

EPA Contacts

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Site Partner Contacts

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Environmental Remediation Program
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valerie.wilder@dnr.mo.gov

Iron County Health Department
606 W Russell Street
Ironton, MO 63650
Phone: (573) 546-7121

Elected Officials

Sen. Roy Blunt
260 Russell Senate Office Building
Washington, DC 20510
Phone: (202) 224-5721

Sen. Josh Hawley
212 Russell Senate Office Building
Washington, DC 20510
Phone: (202) 224-6154

Rep. Jason Smith
Missouri 8th Congressional District
2418 Rayburn House Office Building
Washington, DC 20515
Phone: (202) 226-4404

Commissioner Jim Scaggs
Iron County
P.O. Box 42
250 South Main Street
Ironton, MO 63650
Phone: (573) 546-2915

Mayor Johnny Setzer
1 Missouri Avenue
Viburnum, MO 65566
Phone: (573) 244-5520

Overview of the CIP Process

EPA prepared a survey to determine community needs for the site. The survey was posted on Facebook and available to 2,800 members of the Viburnum Trend Group from April 21 through May 7, 2021. Results from the survey can be found in the following section.

Community Issues and Concerns

Community concerns were focused on human health and lead. The respondents provided recommendations on which communication methods and channels to use to engage members of the public, local officials, and groups. The respondents were generally satisfied with EPA's actions at the site to date. A synthesis of the responses indicates:

- Generally positive views toward EPA's commitment to cleaning up hazardous material at the site.
- A high level of interest in this site, including the removal actions at residential properties.
- Effective engagement and communication can be achieved through direct email and mail, with augmented communication through the Mountain Echo newspaper, J-98 radio, and the Viburnum Trend Group on Facebook (FB). The FB group contains more than 2,800 members.

Contaminants of Concern

As a result of mining-related activities that have occurred in and around the city of Viburnum, lead and lead compounds have been released into the environment in quantities sufficient to present an imminent and substantial danger to public health and welfare. The contaminant of concern (COC) at the site is lead, which is a toxic metal that is harmful if inhaled or swallowed. COCs are chemicals that need to be addressed by a cleanup action because they pose a potential threat to human health or the environment.

The Centers for Disease Control and Prevention's Agency for Toxic Substances and Disease Registry (ATSDR) has a series of online summaries about contaminants called ToxFAQs. You can find ToxFAQs on lead at www.atsdr.cdc.gov/toxfaq. For more information on contaminants at Superfund sites, please visit: www.epa.gov/superfund/contaminants-superfund-sites.

Lead

Lead is a naturally occurring element; however, most lead found in the environment is due to human activity. Lead is a toxic metal that is harmful if inhaled or swallowed. A person can be exposed to lead through ingesting (eating or drinking) something with lead in it or through inhaling (breathing) lead dust. Lead is classified by EPA as a probable human carcinogen and is a cumulative toxicant that affects multiple body systems. Lead exposure can pose serious health risks, particularly for children 6 years old and younger; as well as pregnant women and nursing mothers, who should also avoid exposure to protect their children. Lead is dangerous to children because their growing bodies absorb more lead than adults do. A child's brain and nervous system are more sensitive to the damaging effects of lead because their brains and nervous systems are still developing. The only way to know if your child has elevated blood lead levels is to have his or her blood tested. Talk to your pediatrician, general physician, or local health department about testing your child. For more information on blood testing for children, you can contact:

Iron County Health Department

606 W. Russell St.

Ironton, MO 63650

Phone: 573-546-7121

For more information about lead, please visit: www.epa.gov/lead. The Centers for Disease Control and Prevention's Agency for Toxic Substances and Disease Registry (ATSDR) has a series of online summaries about contaminants, called ToxFAQs. You can find ToxFAQs on lead at www.atsdr.cdc.gov/toxfaq. Lead exposure can cause a range of adverse health effects, including behavioral disorders, learning disabilities, and seizures, putting young children at the greatest risk because their brains and nervous systems are still developing.

COMMUNITY INVOLVEMENT ACTION PLAN

Introduction to the Action Plan

The proposed sampling and cleanup work will be conducted at no cost to property owners. If your residential property qualifies for this time-critical removal, an EPA representative will contact you to discuss the sample results and proposed cleanup activities for your property. The time-critical removal action will proceed as follows:

- EPA began conducting this action for qualifying properties in April 2021.
- Steps will include excavation, treatment, and disposal of lead-contaminated soil; backfilling the excavated area to original grade with clean topsoil or gravel; and restoring a grass lawn at residential properties.
- Sampling of residential yards will continue until EPA's investigation is complete.
- EPA will update the local community when additional information becomes available.

Community Involvement Objectives

EPA endeavors to keep community members informed and involved in the site cleanup process. To promote community involvement, EPA may utilize a variety of tools and techniques. The specific tools and techniques utilized will be based on the level of community interest, identified issues and concerns, and the complexity and duration of the site investigation and cleanup. A list of community involvement activities conducted by EPA may include:

- Providing timely, site-specific information to community members so they are able to participate in, or closely follow, site-related activities to the maximum extent their desire and the process allows.
- Providing a direct contact for community members by identifying an On-Scene Coordinator, or OSC, who will manage and share information about the site.
- Enhancing communications between EPA and local officials to help ensure those officials are informed of site-related activities, and that EPA benefits from the officials' insights regarding the community and its concerns, the site and its history, and local regulatory issues. (See Page 7 for a list of local, state, and federal officials.)
- Enhancing communications between EPA and the media, as appropriate, to help ensure reporters are provided timely information about site-related activities and events and are aware of pertinent site-related topics.

EPA encourages those who want a greater level of participation to consider forming a Community Advisory Group and/or applying for Technical Assistance Grant funding. For additional details, community members are encouraged to view the Superfund Community Involvement Toolkit files online that can be accessed at the following website:

www.epa.gov/superfund/community-involvement-tools-and-resources. You can also contact the Community Involvement Coordinator (or CIC) or the OSC for the site. (See EPA Contact Information in the Appendix.)

Ongoing Communication

EPA will continue to work with the city of Viburnum, community organizations, and community members to ensure that any important updates or information regarding the site are shared directly with the public.

To sign up for the site email list, please contact R7publicaffairs@epa.gov.

Community Involvement Tools and Activities

EPA has identified and developed a variety of tools and activities to better engage with and involve the community.

Webpages

EPA will continue to maintain webpages specifically for the site. For past, current and future updates on the site, please visit:

- https://response.epa.gov/VTLHROU2_TCRA - includes site summary, documents and contacts
- www.epa.gov/superfund/vtlhrou2 - includes basic site information and Administrative Records

EPA also has other webpages available for information about the Superfund program and Region 7:

- National Superfund program: www.epa.gov/superfund
- EPA Region 7: www.epa.gov/aboutepa/epa-region-7-midwest
- Superfund Community Involvement: www.epa.gov/superfund/superfund-community-involvement

Other organizations with webpages that provide information about the site include:

- Missouri Department of Natural Resources: www.dnr.mo.gov
- City of Viburnum: www.viburnum.net

Community Meetings

Based on availability, EPA staff may attend meetings held by community groups, the local government, and other organizations upon request to share information about the site and to address community questions, concerns, ideas and comments. To identify appropriate opportunities and venues to deliver information about the site, EPA will work with the community to coordinate the meetings.

EPA-Hosted Events

EPA staff may host meetings, workshops, and/or open houses to share information with the community. Meetings will be held at a central location that is Americans with Disabilities Act (ADA)-accessible and accessible by public transportation, such as physical meeting venues and virtual interviews and information gathering. Interviewees indicated an overall preference for virtual meetings and social media announcements.

Virtual Meetings

EPA staff may host or participate in meetings virtually, as coordinated with the community. To best accommodate community members, EPA staff may provide options to participate by phone for people unable to join a web-based meeting. EPA staff may share meeting materials ahead of the meeting so people unable to view the presentation can follow along.

Briefings with Local Officials

EPA staff may brief the city mayor upon their request for information or in correspondence with relevant site information.

Outreach at Area Schools

EPA staff may work with area schools, school board members, teachers, and parents to explore opportunities to share site information as part of school events and curricula. The focus will be on environmental education opportunities such as soil sampling, as well as public health and safety.

Educational Materials

To help address community concerns about the site, EPA staff may collect, prepare and distribute user-friendly documents to help people understand site conditions. Materials may be distributed electronically and/or door-to-door.

Periodic Updates

EPA staff will develop and distribute information about the site on an as-needed basis. These will:

- Provide regular updates about the Superfund process.
- Notify the public about public meetings and availability sessions and public comment periods.
- Provide links to publicly available documents and other resources.

EPA staff will maintain and continue to build a site mailing list. If you would like to be on EPA's mailing list to receive site updates via regular mail or electronically, please contact EPA's Community Involvement Coordinator. Updates will also be available at the site's information repositories.

Formal Public Comment Periods

During the Superfund process, EPA announces and opens public comment periods and encourages people to submit information. EPA considers all public comments in the Superfund decision-making process.

Public Comment Tips

Commenting is an important way to make your voice heard. Public comments can strengthen an environmental decision by providing the authoring agency with facts or perspectives lacking in the original draft. Commenting helps EPA create an accurate and comprehensive document to support appropriate and informed decision-making.

- Prepare for commenting by familiarizing yourself with the scope of the issue and relevant laws.
- Identify your key issues and concerns.
- Identify allies who can help with the document review and understanding of the report, and coordinate your comments with them to strengthen your message.
- Be specific with your comments, including what you think could improve the document, what you think is missing from the document, what you like about the document, and what parts you want to remain in the document.

Translations

EPA may provide written information about the site in English and Spanish, as appropriate. Language interpretation at meetings will be available if needed.

Local Media Outlets

EPA may provide updates and information to local newspapers and radio and TV stations and ask them to report on site-related issues. EPA staff will be available for interviews and will respond to media inquiries in a timely fashion. Inquiries from the news media should be directed to Elizabeth Kramer

EPA may publish public notices about meetings and other events in local newspapers and send notices to other local news outlets. EPA may include the following media outlets as part of outreach and information delivery efforts.



The Mountain Echo
110 N. Main Street
Ironton, MO 63650
Phone: (573) 546-3917
www.myironcountynews.com



KTJJ (98.5 FM) "The Boot" Radio
1401 KREI Blvd.
Farmington, MO 63640
Phone: (573) 756-6476
www.mymoinfo.com

Social Media

EPA will share site updates through Facebook, Twitter, and other social media:

- EPA Region 7 Facebook
- EPA Region 7 Twitter
- EPA site webpages
- EPA Region 7 news releases



Information Repository

EPA keeps site project information and reference materials for the public to read at local information repositories. Copies of cleanup documents for the site are available at the locations below.

Access to online Information Repository: www.epa.gov/superfund/vtlhrou2

Additional information is available online at: https://response.epa.gov/VTLHROU2_TCRA

Fact Sheets are available online at: www.epa.gov/mo/missouri-cleanups

EPA Region 7 Records Center

U.S. Environmental Protection Agency, Region 7

11201 Renner Boulevard

Lenexa, KS 66219

Phone: 1-800-223-0425

Hours: 8 a.m. to 4:30 p.m.

Information is primarily provided electronically, but hard copies are available from the repository upon request. Some of the materials available at the repository include:

- Administrative Record
- Action Memorandum for time-critical removal actions
- Site fact sheets

Many of these documents are also available through the site web page: https://response.epa.gov/VTLHROU2_TCRA.

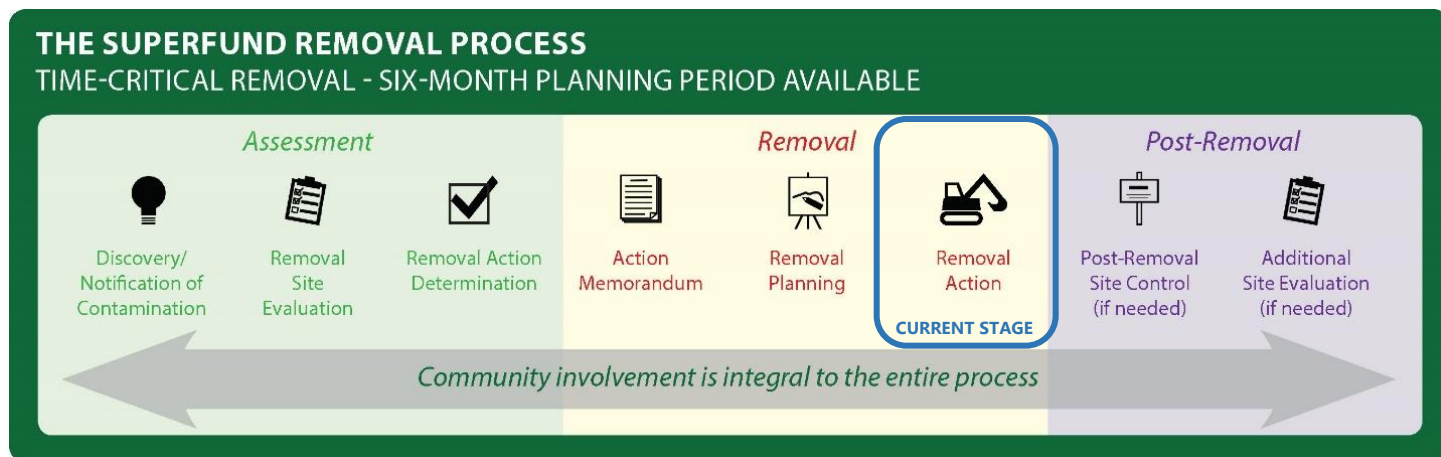
APPENDIX

Superfund Removal Process

Removal responses are common at Superfund sites when the contamination poses an immediate threat to human health and the environment. Removal actions tend to be swift responses to immediate threats from hazardous substances, pollutants or contaminants to eliminate dangers to the public. Removals are classified as either emergency, time-critical, or non-time-critical, depending on the extent and type of contamination.

Superfund Removal Process – Time-Critical Removals

Time-critical removals are situations where EPA determines that a removal is appropriate and on-site removal activities must begin within six months. Examples include removal of drums or small volumes of contaminated soil and stabilization of lagoons. The following section describes the general steps in a time-critical removal.



Assessment

After the contamination is discovered, EPA evaluates if the site poses a threat to people and the environment and whether hazards need to be addressed immediately or additional site information will be collected.

Removal

The Action Memorandum describes the cleanup method chosen for the site and the reasons for the selection. Removal planning is the phase during which the plans for removal are designed, and then the removal action begins.

Post-Removal

After the removal action, site controls are implemented to protect human health and the environment if needed. Additional site evaluation may take place to determine whether further action is needed.

Community Technical Assistance Resources

EPA provides additional assistance to communities through a variety of technical assistance resources. These resources include the Technical Assistance Grant (TAG) program, Technical Assistance Services for Communities (TASC) program, and Community Advisory Group (CAG) formation support. For more information on these resources, please visit: www.epa.gov/superfund/superfund-technical-assistance-communities.

	TAG	TASC	CAG Formation Support
Overview of Program/Support	• Awards grants to eligible community groups affected by the Superfund National Priorities List (NPL) sites and proposed NPL sites to contract with independent technical advisors to provide the services listed below. • Community groups must be able to manage a grant, be an incorporated nonprofit, and provide a 20% match, which can include in-kind services.	• Provides technical information assistance services through a national EPA contract. Services are provided at no cost to communities. • Suitable for communities with short- and long-term needs.	• CAGs provide a forum for community discussions of site-related issues and are made up of representatives of diverse community perspectives. • EPA can help with CAG formation.
Services	• Review and explanations of site technical documents and information • Comments on technical documents	• Review and explanations of site technical documents and information • Comments on technical documents • Community trainings and workshops • Educational presentations • Technical assistance needs assessments • Facilitation of community meetings • Technical advisor services during community meetings • Outreach and educational materials for communities • Assistance with understanding the environmental decision-making process • Language translations	• Informational meeting about CAGs • Assistance in determining CAG size and membership • Training for CAG members • Administrative support and translation and meeting facilitation services

Site Reuse and Redevelopment

EPA's goal is to make sure that site cleanup is consistent with its likely future use. Consideration of reuse at a site can occur at any point in the Superfund cleanup process from investigation activities to deletion from the NPL.

Community Involvement During Reuse and Redevelopment

EPA works with local governments, community organizations, businesses, residents, and partners to consider the reuse of Superfund sites. Reuse planning enhances community engagement during Superfund cleanups by proactively including communities in the decision-making process.

For more information about reuse planning and technical assistance resources available for communities, visit: www.epa.gov/superfund-redevelopment-initiative/community-support-superfund-sites.

EPA Contact Information

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Glossary of Terms

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.

Information Repository

A record storage area at or near a Superfund site that contains reports, documents, and Fact Sheets pertaining to the site.

Acronyms and Abbreviations

CIP	Community Involvement Plan
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EPA	United States Environmental Protection Agency
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Additional Superfund terms can be found in the online glossary at: www.epa.gov/superfund/superfund-glossary.