



# Community Involvement at Federal Facilities

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OCTOBER 1, 2019

FEDERAL FACILITIES RESTORATION AND REUSE OFFICE

# Overview

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



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Community Involvement

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# COMMUNITY INVOLVEMENT: LEAD AGENCY ROLE

# “Lead Agency” Definition

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

# Role of Federal Agencies



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

# Community Involvement in Federal Facility Documents

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

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

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

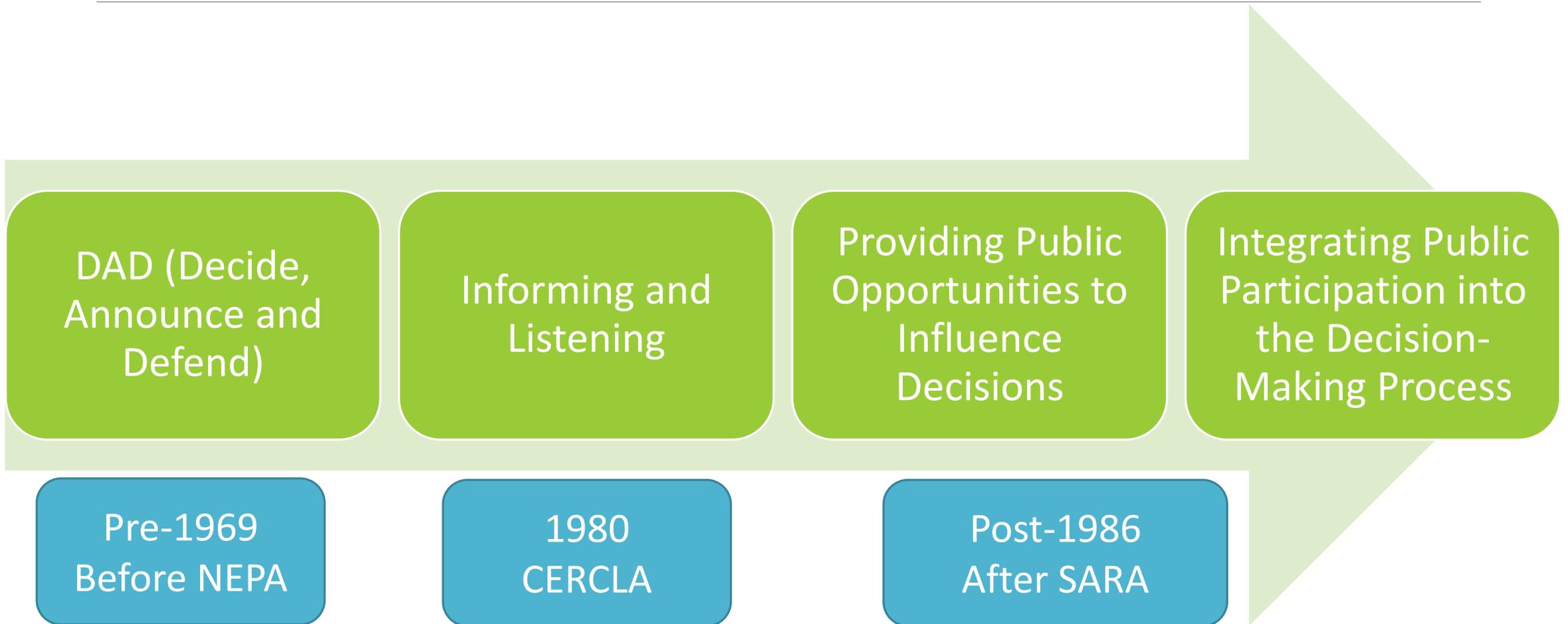


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# Levels of Community Involvement

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# History and Trends in Superfund Community Involvement



# Spectrum of Community Involvement

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

# Special Consideration at Federal Facility Sites

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## □ Community Advisory Boards

- Department of Defense Restoration Advisory Boards (RABs)
- Department of Energy Site-Specific Advisory Boards (SSABs)

## □ Ingredients for Advisory Board Success

- Represent a broad range of community interests
- Have good working relationships with the federal agency
- Participate in site decisions
- Keep the community informed about the Board's activities
- Provide opportunities for community participation at meetings



## DoD RABs

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- ❑ Since 1994, restoration advisory boards (RABs) have been established at over 300 military installations and properties
- ❑ Stakeholder group that meets on a regular basis to discuss environmental restoration at a DoD site

# DOE EM SSABs

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

## □ Local Boards

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

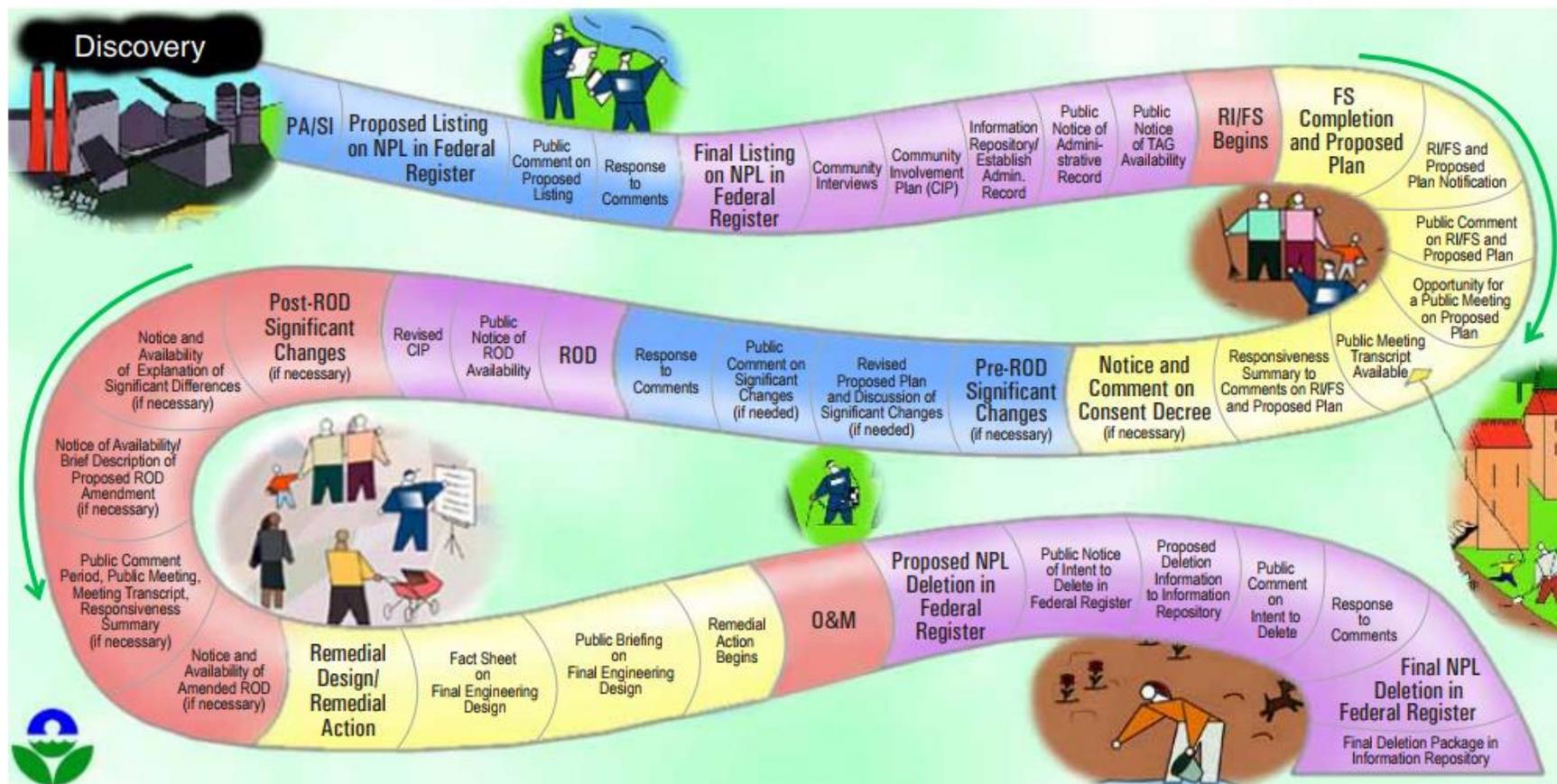


# Advisory Boards and Community Involvement

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

# Community Involvement Activities at NPL Sites



## Community Involvement and Outreach Center Office of Emergency and Remedial Response

U.S. EPA Phone: 703-603-XXXX  
 Ariel Rios Building Fax: 703-603-9100  
 1200 Pennsylvania Ave., NW <http://www.epa.gov/superfund>  
 Washington, DC 20460

January 2001

Community Involvement Opportunities at NPL Sites

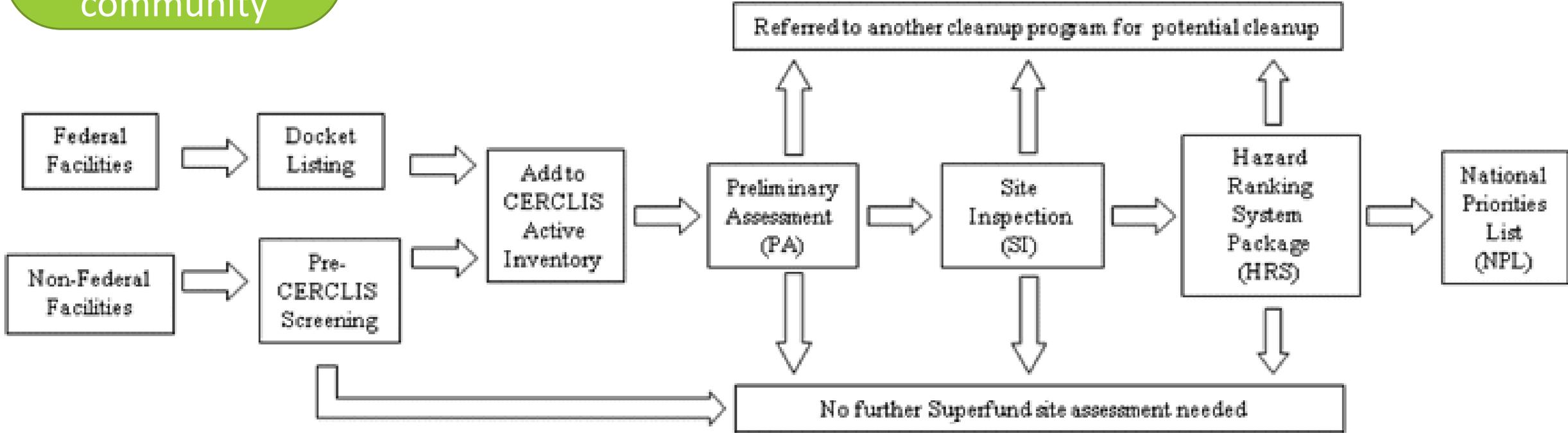
# Initial NPL Listing Community Involvement

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CI does not typically start at PA or SI stage, but provides opportunity to get to know your community

# Discovery of Contamination at Federal Facilities

Major Components of EPA's Superfund Site Assessment Process



Superfund Site Assessment Process; <https://www.epa.gov/superfund/superfund-site-assessment-process>

# NPL Listing CI Requirements

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

**Figure 3-1: Recommendations for Planning and Conducting Community Involvement during the NPL Listing Phase**

Complexity/Type of Site—EJ/Tribal—Community Interest/Concern—Media



<p><b>Low</b>  <b>Conduct These Minimum Activities</b></p>	<p><b>Moderate</b>  <b>Also Consider Adding Some of These Activities</b></p>	<p><b>High</b>  <b>Also Consider Adding Some of These Activities</b></p>
<ul style="list-style-type: none"> <li>• Publish a <i>Federal Register</i> notice of proposed NPL listing.*</li> <li>• Hold a public comment period.*</li> <li>• Prepare a responsiveness summary.*</li> <li>• Publish a <i>Federal Register</i> notice of final NPL listing.*</li> <li>• Prepare a fact sheet, flyer or postcard.</li> </ul>	<ul style="list-style-type: none"> <li>• Develop a communication strategy.</li> <li>• Issue additional fact sheets on technical issues.</li> <li>• Create or update the website or social media site.</li> </ul>	<ul style="list-style-type: none"> <li>• Conduct community interviews.</li> <li>• Host an availability session/open house.</li> <li>• Offer a workshop or webinar on the Superfund process.</li> </ul>

# Removal Action Community Involvement

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# Removal Actions

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

Each type of removal action requires different levels of CI

# Community Involvement in Removal Actions

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



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

# Community Involvement in Removal Actions

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

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

# Required Community Involvement Activities for Removal Actions

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

# Test Your Understanding

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True or False:

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

# Test Your Understanding

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

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

# Test Your Understanding

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

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

# Test Your Understanding

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

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

# Remedial Action Community Involvement

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# Community Involvement Requirements Before RI Field Activities

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



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# Public Notice in Newspapers

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

# Public Notice By Other Mechanisms

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

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

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

Complexity/Type of Site—EJ/Tribal—Community Interest/Concern—Media Interest 

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

# Community Involvement Requirements for the Proposed Plan and ROD

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

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

Community Concern—EJ/Tribal—Controversy—Disruption



**Low**  
Conduct These Minimum Activities

- Prepare a Proposed Plan.\*
- Post a notice of the Proposed Plan.\*
- Hold a public meeting and prepare a meeting transcript.\*
- Hold a public comment period.\*
- Prepare a responsiveness summary.\*
- Issue a press release.
- Distribute a flyer.
- Make the EPA citizen’s guides to cleanup technologies available.

**Moderate**  
Also Consider Adding Some of These Activities

- Prepare a fact sheet summarizing the Proposed Plan.
- Conduct informal activities.
- Host an availability session/open house.
- Prepare additional fact sheets on technical issues.
- Make presentations to community groups in person or via conference call, Adobe Connect, or other Agency meeting or webinar tools.
- Offer a workshop or webinar on the Superfund process.
- Create or update the website or social media site.
- Prepare communication strategies as needed.

**High**  
Also Consider Adding Some of These Activities

- Conduct focus groups.
- Form or work with an existing Community Advisory Group.
- Offer alternative dispute resolution services.
- Conduct a TANA and, if appropriate, provide technical assistance.

# Test Your Understanding

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True or False:

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

# Test Your Understanding

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

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

# Test Your Understanding

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

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

# Test Your Understanding

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

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

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

# Community Involvement for Changes Post-ROD

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

# Community Involvement Requirements for ESD

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

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



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# Community Involvement Requirements for ROD Amendments

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



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Similar to ROD CI Process

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

Community Concern—Media—EJ/Tribal—Potential Controversy/Disruption 

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

# Five-Year Reviews and the Community

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

# 2011 EPA Guidance on FYRs

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

## Cleanups at Federal Facilities

Home

FEDFacts

Base Realignment and  
Closure (BRAC)

Emerging Contaminants  
and Contaminants of  
Concern

Federal Agency Hazardous  
Waste Compliance Docket

Military Munitions and  
Unexploded Ordnance  
(UXO)

Quality Assurance

## Five-Year Review of Federal Facility Cleanups

Overview

Training & Tools

FYR Information

### Community Tools

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

Training and Tools available at

<https://www.epa.gov/fedfac/five-year-review-federal-facility-cleanups>

# Test Your Understanding

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True or False:

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

*The Superfund Community Involvement Handbook and Toolkit*  
describes over 40 techniques

# Communication Tools

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# Community Involvement Planning

- Community Involvement Plan
  - The backbone of community involvement
  - Specifies activities that address community needs, concerns and expectations
- Communication Strategy
  - Single event or short-term
  - Addresses a specific problem or issue
  - Can be a component of a CIP

Communication Strategies

## Communication Strategies

Description	Required Activity
<p>Communication strategies are plans for communicating information related to a specific issue, event, situation, or audience. They serve as the blueprints for communicating with the public, stakeholders, or even colleagues.</p> <p>Communication strategies should:</p> <ul style="list-style-type: none"><li>• outline the objective/goals of the communication,</li><li>• identify stakeholders,</li><li>• define key messages,</li><li>• pinpoint potential communication methods and vehicles for communicating information for a specific purpose, and</li><li>• specify the mechanisms that will be used to obtain feedback on the strategy.</li></ul> <p>Communication strategies do not have to be formal written documents. They can simply involve taking the time to think about a communication problem or issue and determining the best approach for communicating the message or information. Such an approach is especially true for simple issues that need to be conveyed about low-risk sites that have not generated a high level of public concern. However, at sites with high levels of public concern or site cleanup issues that are expected to be controversial, a more formal written strategy may be needed to ensure that all stakeholders are reached and all key messages are communicated effectively.</p> <p>Communication strategies are different from Community Involvement Plans (CIPs), which are required under the National Contingency Plan. A CIP is a site-specific overall plan to enable meaningful community involvement throughout the Superfund cleanup process. A communication strategy can be one component of a CIP but it addresses a specific event, issue, or concern, such as an emergency response to a release, or communicating risk at a site. The CIP, on the other hand, describes an overall strategy for conveying and receiving information throughout the cleanup process at a site.</p>	<p>No.</p> <h3>Making it Work</h3> <p>When significant events or issues arise, a communication strategy can help organize the information that needs to be communicated, identify concerns that may be raised, and ensure the proper audiences are reached.</p> <h3>Why</h3> <p>The first step toward developing a communication strategy is to determine the reason why the communication is necessary and defining the desired objectives. You, as the Community Involvement Coordinator (CIC), should ask yourself, "What is the issue to which EPA is responding?" or "What is the action that EPA is taking that warrants development of a communication strategy?" before determining the need for the communication. CICs should then ask themselves, "What do we want to accomplish by communicating this information?" Objectives may include:</p> <ul style="list-style-type: none"><li>• providing information;</li><li>• increasing awareness;</li><li>• encouraging action;</li><li>• building consensus;</li><li>• changing behavior;</li><li>• promoting community participation;</li><li>• resolving conflict, or</li><li>• asking for input.</li></ul> <h3>Who</h3> <p>Once your reason for communicating is determined, you can focus on defining the audiences you need to reach and how you want to reach them. Ask yourself the following questions:</p> <ul style="list-style-type: none"><li>• Who is involved, affected, interested?</li><li>• Is there an obvious audience?</li><li>• Are there others who may be affected?</li><li>• Are there traditionally underrepresented groups that need to be reached?</li></ul>

# Major Components of the Community Involvement Plan

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

## Fact Sheets

### Overview

A fact sheet is a brief document written to help residents and other stakeholders understand actions that EPA may be taking at a nearby Superfund site and may include explanations of laws, regulations, and technical information relevant to the site. The purpose of a fact sheet is to engage with communities by providing information that addresses common questions and concerns of those affected by a Superfund site. Fact sheets are typically:

- **Site updates** to provide community residents with general site information and to keep them abreast of site activities and cleanup progress; or
- **Special purpose documents** to convey information about a specific Superfund site action, such as proposed listing on the National Priorities List (NPL), availability of a *remedial plan*, availability of the final engineering design, or proposed deletion of a site from the NPL.

Based on discussions among Superfund focus groups, many citizens have indicated that they are more comfortable with the term "site update" or "community update" than "fact sheet" and would be more inclined to read a document referred to as a site update than a fact sheet.

### Why This Is Important

Fact sheets are important because they keep community members informed and educated about the activities occurring at the Superfund site. While fact sheets are useful and appropriate throughout the Superfund process, they are required in only one instance, at the completion of the final engineering design. National Oil and Hazardous Substances Pollution Contingency Plan (NCP) 40 CFR §300.435(c)(3) states that "[a]fter the completion of the final engineering design, the lead agency shall issue a fact sheet and provide, as appropriate, a public briefing prior to the initiation of the remedial action."

### Implementation

Fact sheets are used to inform the community about the Superfund process, particularly if site activities

*This and all tools in the Community Involvement Toolkit should be used in conjunction with the Community Involvement Handbook, which provides guidance to EPA staff on how EPA typically plans and implements community involvement activities at Superfund sites.*

will take place over a long period of time. Fact sheets can inform the community about the site assessment process, or describe the preliminary findings and next steps after the assessment has been completed. A fact sheet can serve as a brief, easy-to-read summary of a lengthy proposed plan. A fact sheet explaining changes to a record of decision (ROD) can be strategically formatted to include a simple side-by-side comparison of the changes. Fact sheets can be a reassurance to the community that EPA is still involved and working toward site cleanup.

### When to Prepare Fact Sheets

Fact sheets can be useful:

- To provide informal technical assistance as part of a *technical assistance needs assessment*.
- At the beginning and end of a site assessment.
- At the beginning and end of a remedial investigation.
- When the feasibility study is released.
- When a long, detailed proposed plan is released, and during the public comment period for the proposed plan.
- When the ROD is released or amended.
- When the engineering design is released, and before the remedial action is initiated.
- During remedial design/remedial action.
- When construction is complete.
- During a five-year review.
- When the site is proposed for deletion from the NPL.
- During an emergency removal or response.
- Whenever the community expresses a concern over a specific site activity or condition.
- When you perceive confusion in the community regarding a site-related issue.
- To clarify a misunderstanding.
- To explain technical issues.



## Mailing Lists

### Overview

A mailing list is a tool that contains contact information for interested parties. It is usually in an electronic format, such as an Excel spreadsheet or other database, and sortable by any field, including last name, organization, city, state, region, phone number, special interest, or other relevant factors. An organized and updated mailing list that encompasses the entire affected community at a Superfund site can be an important way to implement some of the activities included in the *community involvement plan* (CIP).

### Why This Is Important

This activity is important because it enables you to identify and contact any or all members of the affected community easily and quickly with site-related information and announcements. An up-to-date mailing list contains current addresses (and sometimes other contact information) for all members of the affected community. Even if other dissemination methods, such as social media, may be preferred over mail, maintaining an accurate mailing list provides a resource containing the names and addresses of every household within a specified target area.

### Implementation

The mailing list of interested parties should be developed at the beginning of community involvement for a site. The more quickly that names and addresses can be combined into a formal list, the easier it will be to contact members of the affected community with a mass mailing or a targeted mailing. This tool is most effective when the mailing list is:

- organized in an electronic format that allows sorting by any field;
- based on current, verified, and standardized information;
- easily updated;
- expandable; and
- able to produce mailing labels or send group emails with ease.

Because mailing lists contain personally identifiable information (PII) and thus are subject to EPA's

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**Privacy Policy.** This information should not be made public. (See box below.) Consult with the Office of Regional Counsel or Office of General Counsel before determining whether to disclose or withhold the information. A Freedom of Information Act (FOIA) request may be required.

Mailing lists can be created using a word processing or spreadsheet software program (e.g., Microsoft (MS) Word, MS Excel). An Excel spreadsheet may be particularly useful, as it allows for the flexible sorting of information, and it can be used as a data source when preparing customized letters with the mail-merge function in MS Word. While you can create a new mailing list, it also may be possible to obtain an existing mailing list from a local government or public interest group, or to combine lists from several public interest groups or local governmental units. You also can purchase mailing lists from private-sector mailing list vendors or from a business center operated by the U.S. Postal Service (USPS). Mailing list information also can be obtained directly from attendees at public meetings or conferences.

Regardless of how you acquire the mailing list, you will need to carefully define the parameters of the geographical target area for which the list is created. You can use mapping software to narrow a search for specific addresses within a target area or radius, and then acquire names for selected addresses. You also may wish to identify particular groups of people (for example, families with small children, elderly residents, or non-English speaking residents) within the larger mailing list.

### Email Lists

Mailing lists that contain email addresses can be used for the distribution of information to many internet users at the same time. Be sure to check the email



## Social Media

### Overview

EPA defines social media as any online tool or application that goes beyond simply providing information by allowing collaboration, interaction and sharing. Examples include blogs, wikis, photo and video sharing, podcasts, social networking, social news, web conferencing and webcasting. Such tools allow EPA to reach out to people who may not engage the government in more formal, traditional ways. The Agency is using social media to create a more effective and transparent government, engage the public and EPA's partners, and facilitate collaboration.

### Why This Is Important

This is important because EPA's policy is to use social media where appropriate to meet its mission of protecting human health and the environment. Because many people are turning to social media for information and relying less on traditional media (e.g., newspapers, television and radio), community involvement coordinators (CICs) should evaluate opportunities to use social media to reach their audiences.

It may also be appropriate to monitor local Facebook, Twitter, Reddit and other social media pages to understand what is happening in the community and stay abreast of attitudes and reactions. Site teams should ensure communications over social media align with information on the Superfund site profile pages and other communication channels.

### Implementation

Social media offer additional venues for reaching communities to engage in discussions, disseminate information, and maintain regular contact. This is especially helpful when decreasing travel budgets may limit the time a CIC or other site-team members can spend at the site and in the community. However, it is important to remember that social media should be used in addition to — rather than *instead of* — more traditional communications channels.

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### Where to Seek Assistance

EPA's social media policies evolve as new tools and technologies appear. EPA's *Using Social Media to Communicate with the Public Procedure* explains roles and responsibilities of staff who use social media, how to obtain approval for its use, how to ensure accessibility under Section 508 of the Rehabilitation Act of 1973, and how to moderate comments received through social media channels. In addition, the Agency has *guides and procedures* for using social media, and EPA's Office of Multimedia has *guidelines* for using social media and multimedia to communicate your message.

Contact your [Web Council Member](#) for approval prior to using these tools. Your Web Content Coordinator will ensure that your social media project conforms to your program's goals, and will get approval from the Office of Public Affairs Office of Web Communications before you begin. There are legal issues and federal requirements that are unique to the government — such as privacy, records management, procurement rules, and staff participation on external sites — that directly impact EPA employees' use of social media tools.

EPA maintains a [list of all the social media tools](#) that employees can use because EPA has negotiated special EPA-only agreements that resolve the legal issues with the standard Terms of Service.

### Using Social Media to Communicate with Communities

The public needs to be informed about major milestones in the cleanup of a Superfund site, upcoming site activities, and where to find information



## Public Notices

### Overview

Public notices are announcements that notify the public about important milestones, events, and opportunities for participation in the Superfund process. Public notices may be published in local newspapers, posted on local websites, broadcast on local radio or television, sent as mailings, or communicated to the public in other ways.

### Why This Is Important

This activity is important because public notices inform the community about various aspects of the Superfund process. When the public is informed in a timely manner about site-related activities, they are better able to participate in the cleanup process and to provide input to the Agency. The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), and/or other legal authorities require the lead agency (EPA for fund-lead sites, or a state or tribe for state/tribe-lead sites) to publish a public notice at various points in the Superfund process:

**Remedial process.** Section 117(d) of CERCLA establishes requirements for notifying the public at various stages of the remedial process. In the NCP, 40 CFR §300.815(a) addresses an additional notification activity for the remedial process.

**Removal process.** 40 CFR §300.415(n)(2)(i), §300.415(n)(4)(ii), §300.820(a)(1) and §300.820(b)(1) address notifying the public at various stages of the removal process.

**Technical Assistance Grants (TAGs).** Communities at sites that are proposed for the National Priorities List (NPL) or are on the NPL may be eligible for a TAG. 40 CFR §35.4110 addresses public notification after EPA receives a letter of intent from a community group to apply for a TAG.

### Where to Publish Public Notices

Effective May 4, 2015, the NCP was amended to broaden the mechanisms the lead agency can use

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to provide public notice to the community (80 FR 17202). For the following six actions, the lead agency for the site can publish a notice in a major local newspaper of general circulation or use one or more other mechanisms to notify the public:

- The administrative record file becomes available for a time critical removal action (40 CFR §300.415(n)(2)(i)).
- The Engineering Evaluation/Cost Analysis (EE/CA) for a non-time-critical removal action is issued (40 CFR §300.415(n)(4)(ii)).
- A site is proposed to be deleted from the NPL (40 CFR §300.425(e)(4)(ii)).
- The administrative record file for the selection of a remedial action becomes available at the start of the remedial investigation (40 CFR §300.815(a)).
- The administrative record file becomes available for a non-time-critical removal action (40 CFR §300.820(a)(1)).
- The administrative record becomes available for any other removal actions (40 CFR §300.820(b)(1)).

However, for the following actions, the lead agency is **still required** to publish a public notice in a major newspaper of general circulation:

### Remedial Actions

- The Proposed Plan becomes available (CERCLA 117(a)(1) and 117(d)).
- The remedial alternative has been selected and the Record of Decision (ROD) is signed (CERCLA 117(b) and 117(d)).
- A remedial action, CERCLA 106 enforcement action, or CERCLA 106/122 settlement is taken that differs significantly from the remedial action that had previously been selected and documented in the ROD or in any ROD amendments (CERCLA 117(c) and 117(d)).

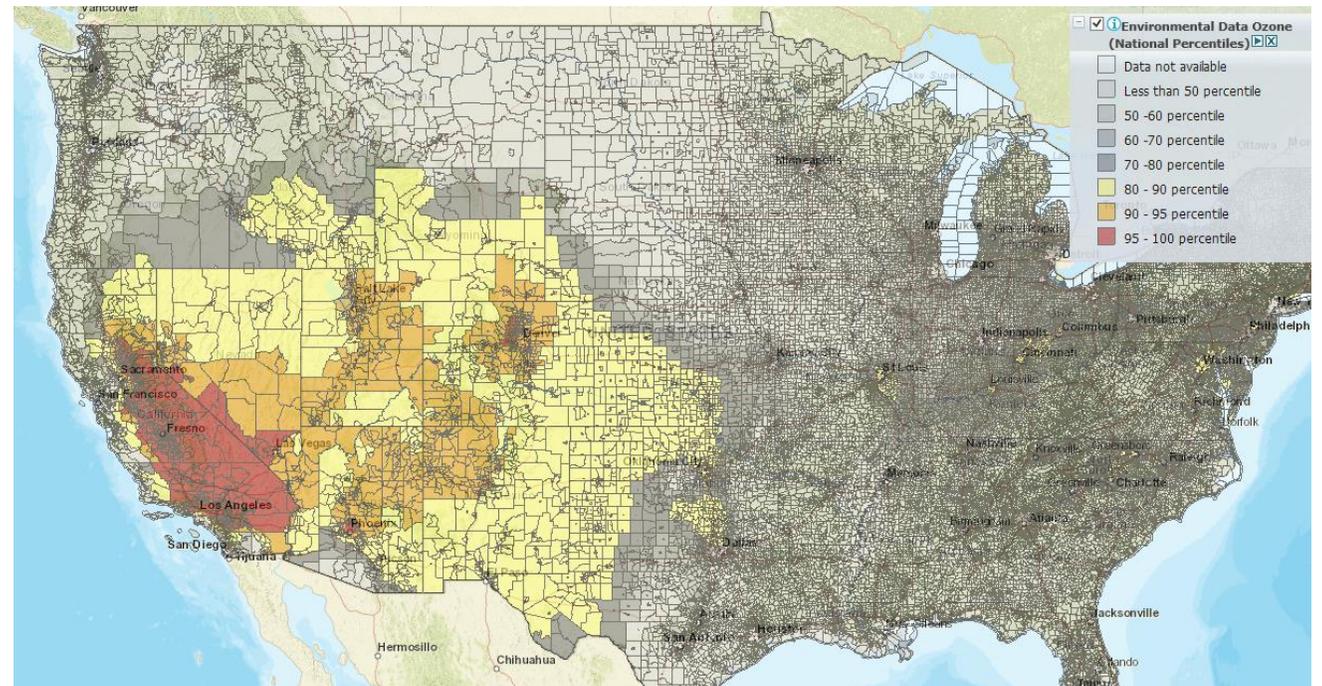


Communication tools include social media, fact sheets, public notices, and mailing lists.

# EJSCREEN

EJSCREEN mapping and screening tool may assist with:

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



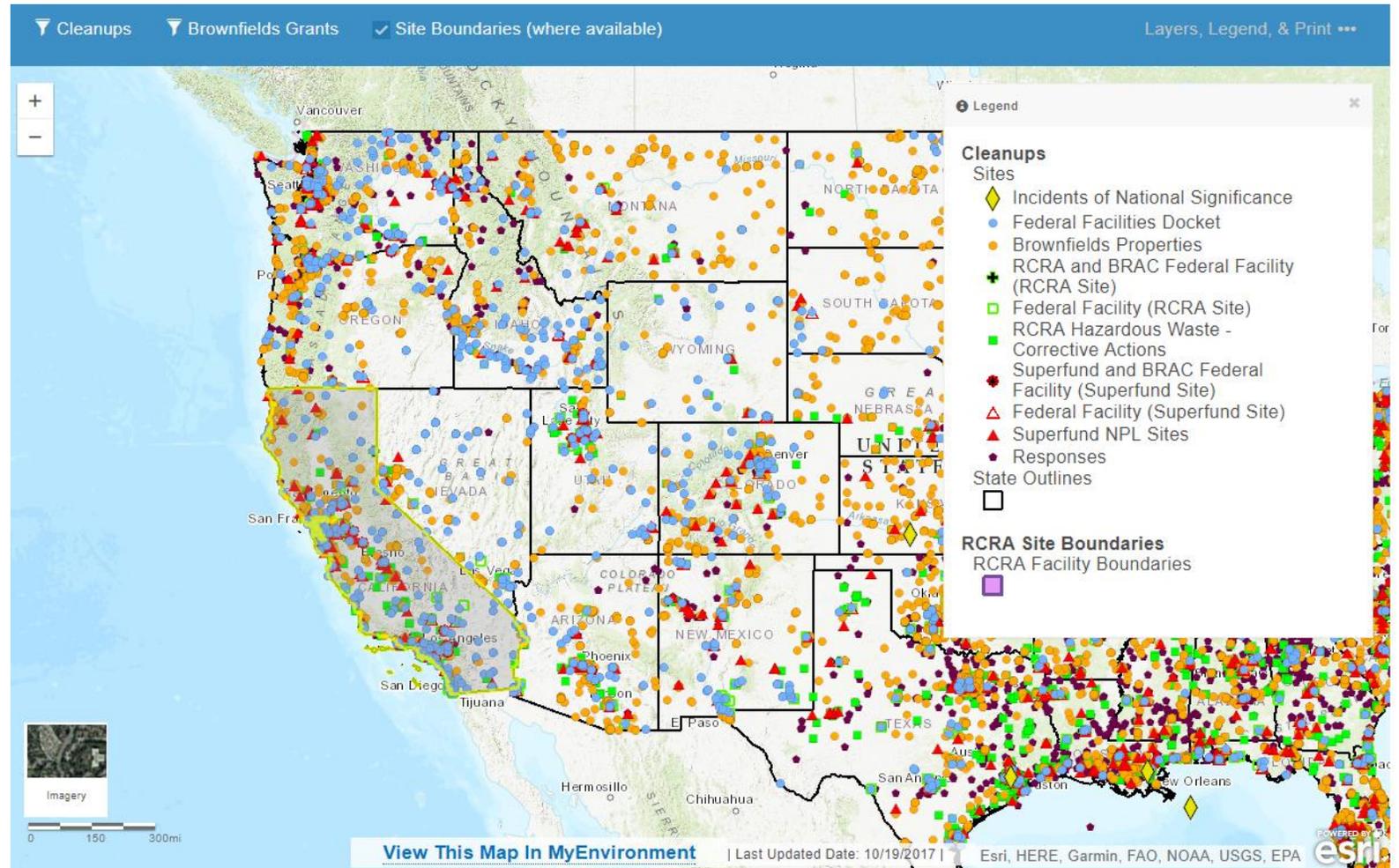
EJScreen for Ozone passed on National Percentiles

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

# “CLEANUPS IN MY COMMUNITY”

Maps nearby hazardous waste cleanup locations and other related information:

- Impaired waters
- Water monitoring stations
- Air pollution areas
- Toxic Release Inventory locations
- Congressional districts
- Tribal areas
- Nearby brownfields
- FEMA flood hazard zones
- and more



# FED FACs

This website contains cleanup status information related to Federal Facilities contained in [EPA's Federal Agency Hazardous Waste Compliance Docket \(Docket\)](#).

## Map of Docket Sites

 Docket Facilities

 Dashboard

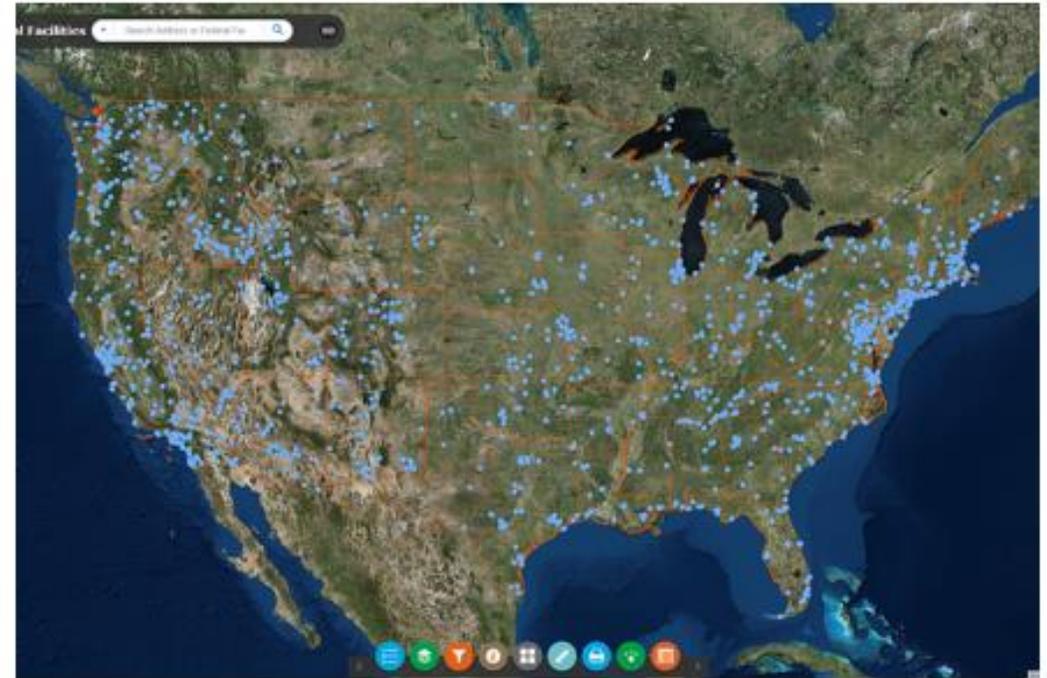
 Site Spotlight

 Property Reuse

 News

# Map of Docket Sites

View the [Federal Facility Docket Sites map](#) to search by street address, city, county or other geographies to locate EPA Federal Facility Docket sites in communities across the U.S.



View the [full version of Cleanups in My Community](#), which includes information on Federal Facility sites, other Superfund sites, RCRA, Brownfields and Emergency Response sites

## Explore Your Community's Characteristics

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

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

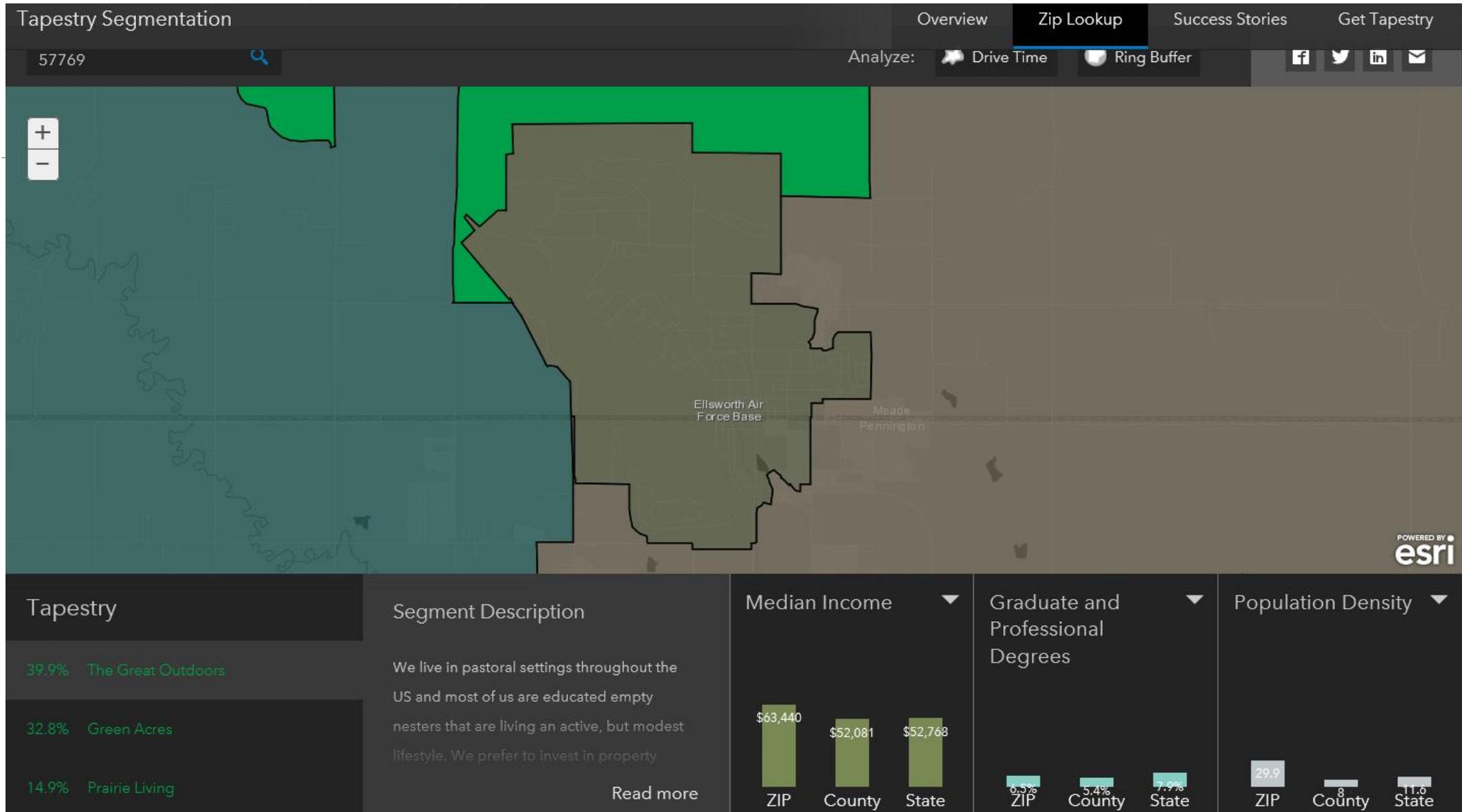
Start Exploring



# Tapestry (ArcGIS Tool)

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

# Ellsworth Air Force Base in Tapestry



# EPA Technical Assistance at Federal Facilities on the NPL

- ❑ Technical Assistance Needs Assessment (TANA)
  - helps determine whether the advisory group is best served by a TAG, TASC, or TAPP.
- ❑ TAG and TASC dependent on EPA funds available
- ❑ More widely used at private NPL sites, but are available at federal facilities

TAG

- Technical Assistance Grant

TASC

- Technical Assistance Services for Communities

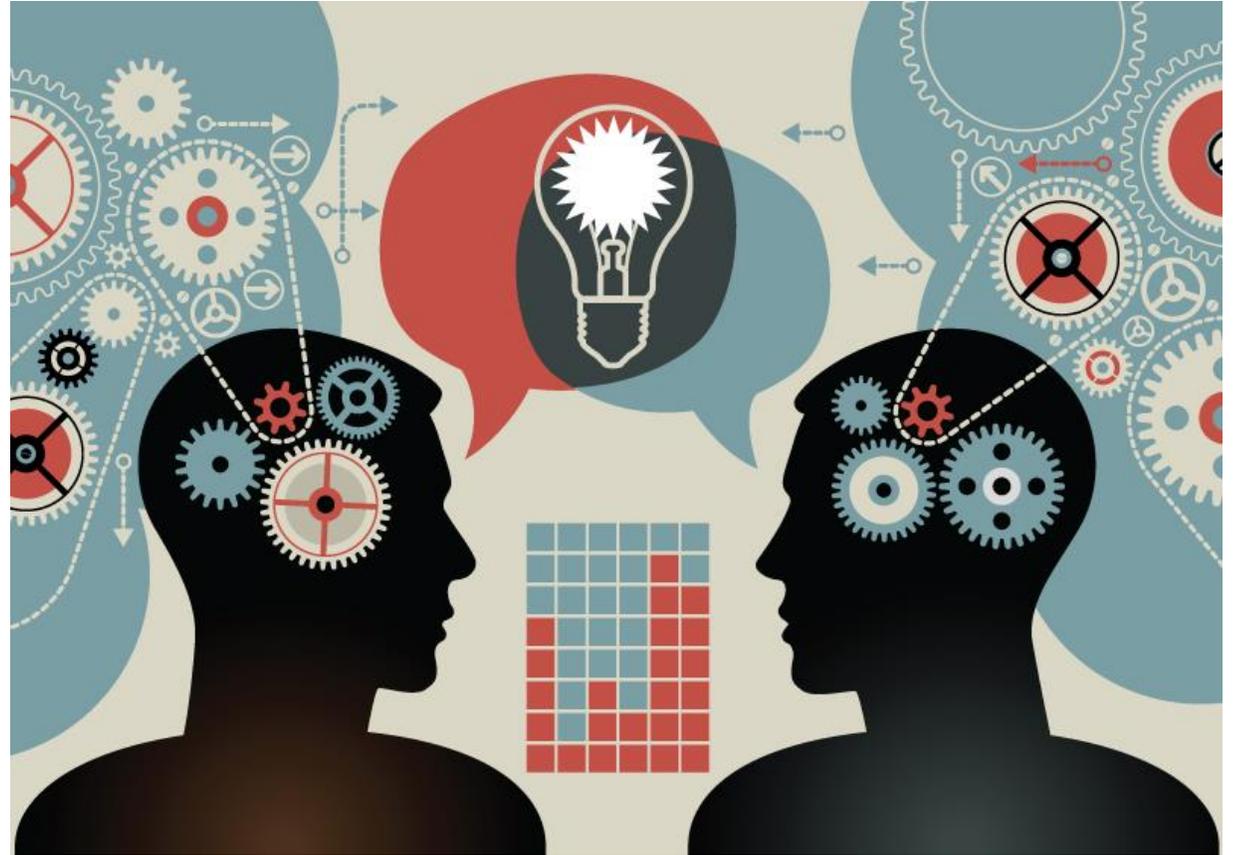
TAPP

- Technical Assistance for Public Participation (For DoD RABs)

## Group Poll

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



# In Review

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



# Questions



# Contact Information

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Emerald Laija

EPA HQ - Federal Facilities  
Restoration and Reuse Office

202-564-2724

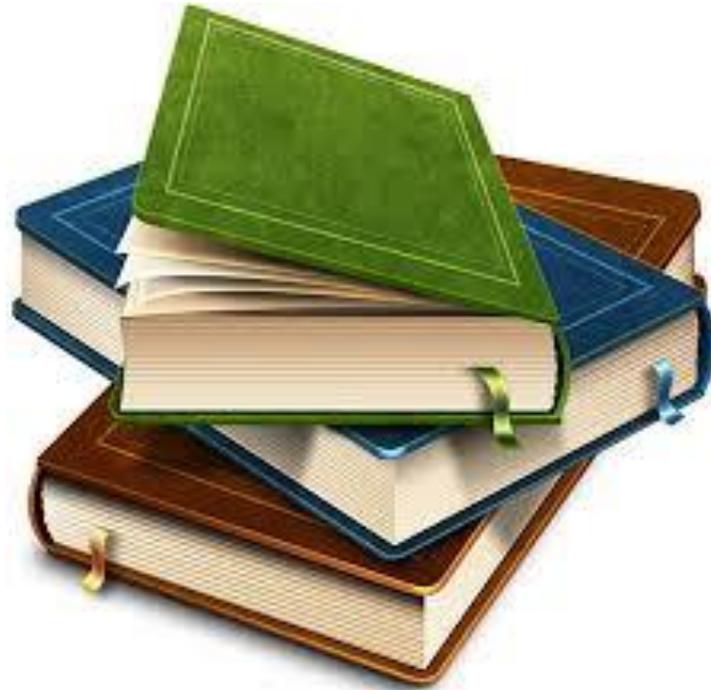
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# CASE STUDY

# Open House Meeting

Lisa M. Cunningham,  
Remedial Project Manager, Region 3

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FORMER NAVAL AIR STATION JOINT RESERVE BASE, WILLOW GROVE

&

FORMER NAVAL AIR WARFARE CENTER, WARMINSTER

# Background

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

# Why an Open House Format

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

Health  
Effects  
Drinking  
Water

Warrington  
Township  
W&S Dept

Warminster  
Township  
Municipal  
Authority

Horsham  
Water &  
Sewer  
Authority

Private  
Well  
Sampling  
NAWC

Open  
House  
(Rovers)

Private  
Well  
Sampling  
NAS JRB

PA DEP

NAS JRB  
PFAS  
Timeline

Warminster  
PFAS  
Timeline

Health  
Effects

PFOS &  
PFOA

# Who made this Open House a success?

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

# Risk Communication Skills

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

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

# Poster Boards/Stations

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## **NAVAL AIR WARFARE CENTER WARMINSTER**

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

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

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

# Shared Poster Stations

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





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

# Summary

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