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Community-based Environmental Protection

OSWER Action Plan

INTRODUCTION

Community-based Environmental Protection (CBEP) brings the government closer to the people it is meant to serve. Instead of addressing environmental problems piecemeal, statute by statute, and then applying a one-size-fits-all solution, CBEP addresses environmental problems in the context of the community in which they occur.

Community-based Environmental Protection is not a new activity, isolated from the day-to-day work of the U.S Environmental Protection Agency (EPA). Instead, it is a new way of accomplishing our traditional tasks in a more effective, more responsive manner.

On February 15, 1995, the Deputy Administrator of EPA asked each Region and each national program office to develop action plans for promoting and supporting Community-based Environmental Protection.

In response to this request, the Office of Solid Waste and Emergency Response (OSWER) consulted with Regional customers to determine how to improve our processes in order to facilitate CBEP. We received useful feedback, including suggestions to improve information access, increase flexibility of Regional commitments, and to encourage economic development by easing fears of Superfund liability. Several OSWER activities already planned for the next few years will respond to these suggestions, and follow-up work to evaluate the success of these activities will ensure OSWER continues to be responsive.

The goal of the OSWER action plan is to identify initiatives to reduce regulatory and policy barriers to CBEP, to make the information communities need more accessible, and to provide useful technical assistance and training in support of CBEP.

The following report details how OSWER will be supporting Regional, state, tribal and local community-based efforts. After a brief summary of the attributes of CBEP and a discussion of OSWER's role, the action plan presents current, short-term, and longer-term OSWER activities to support Community-based Environmental Protection.

EPA has identified five attributes of Community-based Environmental Protection

Five attributes of Community-based Environmental Protection are:

Definable geographical area: This could include urban areas, ecosystems, neighborhoods, counties, tribal lands, etc.

Involvement of stakeholders: A community-based effort should seek to involve those affected by the environmental problems being addressed.

Multi-media, cross-program coordination: Community-based efforts should assess environmental problems across all relevant media, and coordinate implementation across multiple environmental programs.

Collaboratively-developed environmental goals: Specific, measurable environmental goals are key to focusing and sustaining community-based efforts.

Monitoring, evaluating outcomes, and adapting management over time: As most community-based efforts are complex, flexibility must be built into the system in order to make changes over time, based on monitoring and evaluation.

Most OSWER programs are implemented at the community level.

The Office of Solid Waste and Emergency Response (OSWER) provides policy, guidance, and direction for the Agency's solid waste and emergency response programs. OSWER develops guidelines and standards for hazardous waste treatment, storage, and disposal, and for underground storage tanks. OSWER furnishes technical assistance in the development, management, and operation of solid waste activities. OSWER also implements programs to respond to active and abandoned hazardous waste sites and accidental releases (including some oil spills) and to encourage the use of innovative technologies in cleanup activities. Finally, OSWER manages a program to oversee and assure stakeholder involvement in the cleanup of Federal facilities.

All these programs can play a key role in a community-based environmental protection effort. The environmental problems they address are almost always at the community level; they are by nature multi-media, potentially affecting the soil, air, surface water and ground water; and they usually have a public outreach effort.

However, CBEP strategies go beyond traditional community involvement efforts. Community-based efforts must empower and equip the community to participate in environmental decisions, taking into account not only the human but also the ecological and socioeconomic health of a place. CBEP strategies convert the simple implementation of statutorily driven programs into "tools" that communities can use to address multiple environmental problems at once. Increased efficiency, improved results, and direct community input are major goals of CBEP strategies.

OSWER programs are now looking to make that second leap to achieve community-based environmental protection. For example, the Brownfields Economic Redevelopment Initiative brings communities into the decision process for cleanup of contaminated land. Under this initiative, cities promote economic development of abandoned urban areas in ways that work best for them, by bringing together residents, businesses, lenders and developers.

The role of National Program Office is to provide the flexibility and technical assistance needed to implement CBEP efforts.

The role of the National Program Office (i.e. OSWER Headquarters) is not to actually implement community-based efforts. CBEP will be implemented at the local, state, tribal and occasionally Regional levels. Instead, this action plan identifies areas in which OSWER must provide the Regions, the states, tribes and the local governments with the flexibility and technical assistance they need to implement the national programs in the context of CBEP.

Flexibility will allow the best possible use of the OSWER programs' statutory authority as tools to achieve community-based environmental protection. Some OSWER programs already provide considerable flexibility to the states in implementing national standards. Further, the Underground Storage Tank (UST) program, the Chemical Emergency Preparedness and Prevention (CEPP) program, the Resource Conservation and Recovery Act

(RCRA) hazardous waste permitting program and the RCRA municipal solid waste landfill program are almost wholly delegated to the states.

The UST program has built and relied on partnerships with state and local programs for implementation. To make the UST regulatory program less burdensome, EPA based its regulations on performance standards, rather than on specific technologies, thereby providing states and owners/operators flexibility in meeting requirements. EPA also phased-in specific program requirements to allow states and owners/operators time to develop programs and plan financial resources. In addition, EPA has provided states with the flexibility to set their own clean-up level for UST corrective actions, allowing site-specific risk-based decisions.

The CEPP program is tasked with facilitating local efforts to prepare for and respond to emergencies. Operating as a bottom-up, community-based program, OSWER works in direct partnership with State Emergency Response Commissions (SERCS) and Local Emergency Planning Committees (LEPCs) to reduce hazards and prevent accidents. Current technical assistance, guidance, and grants to states and LEPCs will maintain effective program implementation at the local level. In a recent survey of LEPCs, 79% were found to be functioning and mostly compliant with key provisions of EPCRA. Additional tools for successful emergency planning such as computer aided models, publications, and peer exchange programs have been developed by the CEPP program and are currently used by LEPCs.

The RCRA Subtitle C hazardous waste management and permitting program has always been available for state implementation. Almost every state has been delegated the base RCRA hazardous waste program. About half the states have also been delegated new portions of the hazardous waste program which resulted from changes in the RCRA statute in 1984. The states are very capable in implementing hazardous waste programs. Because of the states' expertise and experience in the hazardous waste program area, OSWER is looking at ways to delegate new RCRA rules to states in a more expedient manner than in the past.

The RCRA Subtitle D municipal solid waste landfills (MSWLFs) program is entirely implemented by states. OSWER published the "Solid Waste Disposal Facility Criteria" (Part 258), a set of standards prescribing how MSWLFs are to be designed and operated. OSWER also developed the State/Tribal Implementation Rule (STIR) that established criteria and procedures for review and approval of state landfill permit programs. The STIR also extends to Native American tribes the same opportunity available to states. Most states have adopted and implemented MSWLF permitting programs.

However, allowing flexibility goes beyond state authorizations or state program approvals. To implement CBEP, OSWER must first ensure that its policies, regulations, and planning processes do not hinder community-based efforts. In the past, OSWER programs have been seen as creating barriers to community efforts in several ways. The OSWER planning and budgeting process has in the past stressed national program goals at the expense of local environmental goals. Fixed clean-up standards can fail to take into account local conditions. In addition, the fear of RCRA and Superfund liability can shut down voluntary efforts to minimize waste and clean up contamination.

To help overcome these barriers, OSWER has begun to examine its current activities to see if they allow adequate flexibility (while still ensuring minimum national standards necessary to protect human health and the environment).

But simply allowing flexibility is not enough. OSWER must also ensure that the tools it provides support local, state, tribal and Regional CBEP efforts. Several existing technical assistance programs in OSWER are aimed at facilitating local environmental protection programs. OSWER programs offer assistance to communities in form of fact sheets, newsletters, workshops, technical training, hotlines and other public outreach materials explaining OSWER program requirements. Grants for technical assistance are awarded directly to the states to address local priorities. In addition, the Superfund Technical Assistance Grants (TAGs) encourage community participation in the technical aspects of Superfund clean-ups.

To further facilitate community-based efforts, OSWER is looking to improve its technical assistance/training, information management, and grant programs to assist others in implementing community-based efforts. By receiving feedback from our customers (e.g. Regional and state and tribal programs), OSWER can improve its processes to facilitate community-based efforts.

The remainder of this Action Plan report discusses OSWER's current, near-term and longer-term activities to overcome barriers and to promote and support Community-based Environmental Protection.

CURRENT AND NEAR-TERM OSWER ACTIVITIES

Planning/Budgeting/Grants

Brownfields Economic Redevelopment pilots will support creative demonstrations of local redevelopment solutions.

At least fifty Brownfields pilots will be funded in 1995 and 1996, at up to $200,000 each. These pilots will help:

1) test redevelopment models by directing special efforts toward removing regulatory barriers without sacrificing protectiveness;

2) encourage community groups, investors, lenders, developers and other affected parties to come together to clean up contaminated sites and return them to appropriate productive use;

3) provide a series of redevelopment models for states and localities struggling with such efforts; and

4) provide guidance to cities for cleaning up and returning contaminated, abandoned industrial Brownfields to productive use.

To date, three pilots have been initiated, twenty-two more pilots will be announced by the fall of 1995, and twenty-five more will be selected in 1996. These two-year pilots will provide concrete data for a national policy discussion about what works, along with a series of models for states and localities faced with similar challenges.

Expanded performance partnership agreements give states more flexibility in implementing environmental programs.

Grant Flexibility Demonstration Projects in Regions 1 and 8 combine several grants [including UST and RCRA grants], thus allowing states to allocate according to highest environmental priority. OSWER is also participating in Agency efforts to draft language for authorizing legislation and develop implementation plans for more expanded performance partnership agreements.

Flexibility in setting Regional performance commitments will facilitate CBEP programs in the Regions.

Regions will be encouraged to use the flexibility in the RCRA Implementation Plan (RIP) process and the Superfund Comprehensive Accomplishments Plan (SCAP) to help meet the Regional CBEP budget goal of 20%.

EPA cooperative agreements encourage economic development and waste reduction through recycling.

EPA has sponsored three cooperative agreements to address urban and rural Municipal Solid Waste (MSW) recycling. These initiatives seek to demonstrate regional and local economic development and waste reduction through the use of recycled materials. Specifically, the projects will develop new businesses and convert businesses to use recovered materials; launch scrap-based and manufacturing enterprises; create jobs; create markets for recovered materials; increase recycling-related investments; increase tax revenues; reduce disposal costs; and examine the relationship among recycling programs, market development, and community economic growth.

The three cooperatives agreements include: the EPA/Philadelphia Partnership, Philadelphia, Pennsylvania; the Institute for Local Self-Reliance (ILSR) - National Capital Area Project, Washington, D.C., Baltimore, Maryland, and Richmond, Virginia; and the Rural Jobs Through Recycling and Integrated Waste Management Project- Land-of-Sky Regional Council (LOSRC), Ashville, North Carolina.

As with many other OSWER community-based efforts, these projects are designed to further the concept that communities' environmental protection and economic development goals can both be addressed.

Technical Assistance/Training

Job training initiatives help build local workforce expertise to revitalize contaminated properties.

EPA is working with the Hazardous Materials Training and Research Institute (HMTRI) to expand training and curriculum development to at least twenty community colleges located near Brownfields pilots. Partnerships have already been established with many community colleges, such as the Cuyahoga Community College in Cleveland and the Rio Hondo Community College in Los Angeles, to foster workforce equity through environmental education, vigorous recruitment of students of color, and high quality worker training.

EPA has also developed a Memorandum of Understanding (MOU) with the Department of Labor to link the two agencies' respective local contacts at Brownfields pilot sites to focus on local workforce development. In addition, EPA and the National Institute of Environmental Health (NIEHS) will be implementing a minority Superfund Worker Training Program, a pilot program for the recruitment and training of young persons who live in the inner city.

In addition, EPA has created the National Environmental Teacher's Institute at Morgan State University and four Regional Institutes in Connecticut, Maryland, Ohio and Virginia. The U.S. Department of Energy also provide funding for this effort. The purpose of this effort is to raise environmental awareness of teachers at communities impacted by hazardous waste and environmental justice problems, in order to empower citizens through fuller participation in environmental decision-making.

IPA's to states and municipalities help develop Brownfields programs.

Three EPA staff members have been assigned to cities, by inter-governmental personnel assignment (IPA) to help develop Brownfields programs. Two are assigned to the city of Chicago, IL and one to the city of Detroit, MI. This is a mutually beneficial arrangement, providing cities with technical assistance and EPA staff with practical experience. This will be expanded to at least one IPA per Region during 1995.

Other OSWER technical assistance programs will continue to build state and local environmental protection capacity.

Several existing technical assistance programs in OSWER aimed at facilitating local environmental protection programs will continue. For example, RCRA technical assistance and training will include workshops on enhancing public participation in the RCRA permitting process. Grants for technical assistance are awarded directly to the states to address local priorities. In addition, Superfund Technical Assistance Grants (TAGs) will continue to be key in encourage community participation in the technical aspects of Superfund clean-ups.

Information Management

"CERCLIS 3" recognizes the importance of easy information access in making decisions for cleaning up sites.

CERCLIS 3, a modern, integrated information system, is being designed to support the evolving needs of the Superfund program. CERCLIS 3 will offer its users a "total site picture" support with conveniently integrated management tools. It will enable Superfund staff to share comprehensive, reliable data across EPA Regions and Headquarters, and, eventually, with other Federal Agencies and the public.

The Waste Information Needs (WIN) Initiative will determine the information and technology needs of the future for the RCRA program.

The Waste Information Needs (WIN) Initiative has been established to reexamine the role of information and technology in the ongoing business of regulating and overseeing hazardous and solid waste management. Information management has been identified as one of the key tools needed for community-based environmental protection efforts. OSWER will be working in partnership with the states to evaluate waste information data and technology needs and to develop an Information Strategy Plan (ISP) to identify the needs of the future. OSWER, working with the Regions and states, will coordinate national meetings (to be held during the month of June), to develop the ISP. The Association of State and Territorial Solid Waste Management Officials (ASTSWMO) will be coordinating the state support for this project.

CAMEO and LandView Information Management Systems provide tools to local planners to respond to chemical emergencies

A number of initiatives involve enhancing access to information to Local Emergency Planning Committees (LEPCs), the 3,500 local entities established under Title III or EPCRA, which join stakeholders at the community level in examining community risk.

LandView II, an innovative "community right-to-know" software tool presents information from five EPA databases, displayed on maps together with demographic and economic information from the Bureau of the Census. LandView allows communities to evaluate environmental risks and identify areas of concern for environmental justice. This work grew from CAMEO (Computer Aided Management of Emergency Operations), software developed jointly by EPA and the National Oceanic and Atmospheric Administration to assist the management of information now available to local communities through the Emergency Planning and Community Right-to-Know Act. In partnership with RTK Net, a non-profit on-line information system, CAMEO and LandView can enhance the community's access to information and their use of that information to examine issues in their own neighborhoods.

In addition, the Risk Management Plans which certain facilities will be required to prepare as part of the Clean Air Act Amendments will be available to LEPCs and will provide considerably more very specific information on risks of accidents in the community. This will require development of a system simply and easily accessible by LEPCs and others.

Removing 24,000 sites from the CERCLIS inventory will help communities redevelop abandoned sites.

Of the 39,000 sites in CERCLIS (EPA's inventory of known or potential Superfund sites), OSWER has determined that 24,000 sites do not currently warrant further Superfund involvement, based on available information, and have been screened out of the current inventory.

Historically, a negative stigma has often been attached to all sites in CERCLIS, due to the potential for Superfund liability. However, the majority of sites that have been evaluated by OSWER have been found to not warrant further Superfund consideration. Thousands of these sites have been found to not be contaminated at all, while others are being cleaned up under state programs.

As part of the Brownfields Action Agenda, OSWER is in the process of removing those sites which do not warrant further Superfund involvement from the CERCLIS inventory. This removal will help correct the market distortion that has made inclusion in CERCLIS an impediment to redevelopment. OSWER is also working to improve public access to site assessment data collected at these sites.

Increasing public access to information can provide the tools needed to conduct community-based environmental protection.

Current and future efforts to increase access to OSWER information can provide the tools needed to conduct environmental protection. The latest efforts include placing a wide variety of information about hazardous and non-hazardous solid waste on the Internet for access and retrieval by the general public. Examples of information available on the Internet include a booklet on safer disposal of solid waste, the universe of combustion facilities, and information on hazardous waste storage, treatment and disposal facilities.

Guidance/Regulations/Proposed Legislation

Developing and implementing tools to remove liability-based barriers to Superfund clean-ups will encourage communities to clean up and reuse contaminated property.

OSWER will be supporting the Office of Enforcement and Compliance Assurance (OECA) in identifying options and developing tools to remove liability-based barriers to clean-up of contaminated sites. For example, new guidance has been developed on Prospective Purchaser Agreements in order to expand the circumstances under which EPA will enter into agreements, promising not to file a lawsuit against a prospective purchaser of contaminated property for the contamination that existed before the purchase. In addition, guidance will also be developed to clarify the liability of municipalities who acquire contaminated property and of owners of property located above contaminated aquifers. Finally, EPA will issue guidance to explain the policy that lenders who do not actively participate in the day-to-day management of a facility will not be pursued for clean-up costs.

Issuing guidance on future land use in Superfund remedy selection process should result in greater community involvement in and support for remedies selected.

OSWER will issue a directive presenting information for considering land use in making remedy selection decisions under CERCLA at National Priorities List (NPL) sites. EPA believes that early community involvement, with a particular focus on the community's desired future uses of property associated with the CERCLA site, should result in a more democratic decision making process; greater community support for remedies selected as a result of this process; and more expedited, cost-effective cleanups.

Efforts to increase public participation and stakeholder involvement give local communities a greater voice in waste program activities.

OSWER has many efforts underway to increase public participation in waste program activities. For example, OSWER is encouraging Community Action Groups (CAGs) at Superfund sites to promote early, direct, and meaningful public involvement in the Superfund clean-up process. CAG guidance is currently undergoing Regional review. In a similar effort, EPA and the Department of Defense (DOD) have issued joint guidelines and are conducting training sessions on establishing Restoration Advisory Boards (RABs) to enhance community development at closing installations. In addition, OSWER proposed a public participation rule on June 2, 1994, entitled RCRA Expanded Public Participation and Revisions to Combustion Permitting Procedures to encourage earlier, more meaningful public involvement in the RCRA permitting process.

The Siting Workgroup is looking at options to increase community involvement in siting actions.

The Siting Workgroup is evaluating current siting procedures in ten states and meeting with stakeholders involved in Environmental Justice issues in order to find ways to improve the siting of hazardous waste facilities. In particular, the group is looking at options to increase community involvement and awareness of siting actions early in the process, especially prior to the submittal of permit applications. The group is also exploring ways to consider the environmental impacts of proposed facilities on communities which already host more than one hazardous waste facility.

Under the proposed "Post-Closure Rule," authorized states would have more flexibility in cleaning up regulated hazardous waste land disposal units.

Current ground water monitoring and closure/post closure requirements are more stringent for regulated hazardous waste units than for other types of solid waste management units. This distinction is often purely administrative, as the two types of units can contain similar types of wastes, and in many cases are located in close proximity. The proposed "Post-Closure Rule," if finalized, would allow regulators, on a case-by-case basis, to address clean-up of regulated units using the more flexible corrective action regulations for solid waste management units, which can take into account actual site conditions.

Proposed rule would give states flexibility to allow the use of alternative monitoring methods at small municipal landfills.

EPA is drafting a proposed rule that, if finalized, would provide approved states and Tribes with the flexibility to allow the use of alternative monitoring methods at small municipal landfills located in dry/remote areas on a site-specific basis. This would help alleviate the regulatory burden imposed by ground-water monitoring well requirements and free up resources to direct towards other environmental efforts of higher priority to the community.

Proposed Subtitle C Tribal Authorization Rule will give Tribes flexibility in implementing hazardous waste programs.

OSWER is currently drafting a proposed rule which will allow Tribes to apply for authorization of the Subtitle C hazardous waste program. The proposed rule provides Tribes the flexibility they need in order to be able to obtain authorization by allowing authorization of partial hazardous waste programs. For example, Tribes which do not wish to be authorized for permitting authorities may still obtain authorization for generators and transporters. This rule will allow Tribes to apply for funding to manage their own hazardous waste program in lieu of the Federal government, thereby enabling the Tribes to participate more in environmental decisions.

Tools for risk-based decision-making build flexibility into the UST corrective action program.

OSWER and the Regions will actively promote the development and implementation of risk-based decision-making processes in state Underground Storage Tank (UST) programs through information sharing and technical assistance. Risk-based decision-making is a process that state UST programs can use to make determinations about the extent and urgency of corrective action and about the scope and intensity of their oversight of corrective action by UST owners and operators. This will provide a tool for states to build flexibility into their UST corrective action programs, one which is conceptually and operationally compatible with CERCLA remedial and RCRA corrective action programs.

Several uses of risk-based decision-making include but are not limited to: categorizing or classifying sites; aiding in the establishment of cleanup goals; and deciding on levels of oversight in UST owners and operators. This will encourage the use of UST cleanup goals that are compatible with broader community goals.

New OSWER exposure model can be used to assess lead exposure from several different sources.

OSWER has developed a new model for evaluating lead exposures called the Integrated Exposure Uptake Biokinetic Model (IEUBK). This model allows the risk manager to assess the contribution of different sources of environmental lead (e.g. lead from drinking water, paint and household dust) to overall blood lead levels. It allows a flexible approach to considering risk reduction measures that would have the greatest impact on reducing blood lead levels to people in the community.

Superfund Reform Act emphasizes a CBEP approach.

In 1994, the Superfund Reform Act (SRA) was introduced to reauthorize Superfund with provisions emphasizing economic redevelopment, community involvement and outreach, and remedy reform. These provisions will help convert the Superfund program into a tool for Community-Based Environmental Protection by fostering state program development, promoting environmental justice, addressing worst sites first, and emphasizing construction completions.

<u>Economic Redevelopment Through Greater State Involvement</u>
An important focus of the Superfund program will be increased state involvement in the cleanup process. The Agency intends to defer sites to the states and provide increased technical assistance as the states compel Potentially Responsible Party (PRP) response under state authorities. The Agency will enter into Core Program cooperative agreements with states to assist them in building and strengthening their own Superfund programs. Providing the states with this assistance will enable states to address many of the sites that the Agency's Superfund program would otherwise have to delay while remediating higher risk National Priority List (NPL) sites. In forging partnerships with the states, the Agency will increase the number of hazardous waste sites addressed and put to productive use, while enabling EPA to focus on the most critical sites.

Outreach Activities/Environmental Justice

The goals of the program's environmental justice and community involvement and outreach efforts are to address concerns pertaining to the societal equity of EPA's responses at Superfund sites and enhance communities' access and input to site information. Over the next five years, Superfund will enhance information access and outreach, increasing the communities' understanding of site response plans and actions. The communities will then have the additional information needed to take an active and informed role in the remediation process.

Remedy Reform/Worst Sites First/Construction Completions

While moving the program closer to a community-based approach, the SRA improves the pace and quality of protection. By the year 2000, Superfund plans to reach 650 site cleanups by completing an additional 372 construction completions. This cleanup goal will be reached in part through the use of streamlined cleanup techniques, including presumptive remedies, and the Superfund Accelerated Cleanup Model (SACM). Through the SRA, the removal authorities will expand and therefore increase the number of removals performed at both NPL and non-NPL sites. Utilizing removals over long term response actions will maximize resources while minimizing the duration of cleanup activities. Speeding up cleanups will allow the community to more quickly put Superfund sites to productive use.

LONGER-TERM OSWER ACTIVITIES

Implementing Community-based Environmental Protection will be an iterative process, as we learn from the early attempts to implement this new way of doing business. A key part of OSWER's long-term strategy will be to build on lessons learned.

For example, as the fifty Brownfields pilots progress through remedy selection and site clean-up, the information learned will be shared with other communities and possibly even integrated into future Superfund reforms. Similarly, knowledge on waste information technology and data needs gained through current efforts can be applied to make the information management systems more useful and accessible. In addition, as OSWER proceeds through the regulatory review process, additional possible changes to regulations to provide more flexibility to state and local governments may be discovered.

Another key long-term activity will be to coordinate more closely with the other EPA Program Offices. For example, OSWER will investigate the possibility of coordinating more across headquarters on Regional commitments (i.e. Memoranda of Agreement or program equivalent), on state grants, and on sharing environmental information. In addition, there may be other cross-program issues such as ground water protection that may require coordination.

Finally, the most important long-term strategy will be to respond to feedback on OSWER efforts from its partners and customers. Because OSWER does not directly implement community-based efforts, the success of the strategy will be difficult to measure directly. It will only be by receiving feedback from the Regions, states and local communities that we will know if regulatory and policy barriers to community programs have been lessened, if the information needed is accessible, and if the technical assistance and training is useful.

CONCLUSION AND NEXT STEPS

This Action Plan was developed with direct Regional input and is the first step in responding to their needs. OSWER's role in Community-based Environmental Protection will be to remove any barriers the national programs inadvertently introduced into the process, and to provide guidance, technical assistance, training and information support where it is needed. This role will not involve creating new activities, but rather performing current activities in ways that are more supportive of Regional, state and local CBEP efforts.

The next step in the process will be to solicit more customer feedback on the activities mentioned in the OSWER Action Plan. As the Regional plans are submitted, OSWER may be better able to tailor this Plan to the Regions' specific needs. In addition, feedback from state and local governments will help determine if OSWER efforts are headed in the right direction.

This Action Plan is a living document. As the activities listed here are implemented, adjustments may need to be made and new directions taken. However, the most important objective will continue to be enhancing OSWER processes so they better promote and support Community-based Environmental Protection.