



DIRECTIVE NUMBER: 9230.0-3A

TITLE: Community Relations in Superfund: A Handbook

APPROVAL DATE: Transmittal memo signed March 5, 1985

EFFECTIVE DATE: See below

ORIGINATING OFFICE: Superfund

☐ FINAL

☒ DRAFT

STATUS: This is a draft version. The final handbook will be completed in fall of 1985 and will supercede both interim version (9230.0-3) and this draft (9230.0-3A) -- Use 9230.0-3, "Community Relations in Superfund: A

REFERENCE (other documents):

Handbook, Interim Version" until issuance of final this fall.

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United States Environmental Protection Agency
Washington, DC 20460

OSWER Directive Initiation Request

Interim Directive Number

9230.0-3A

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Date

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2/21/86

Title

Community Relations in Superfund: A Handbook

Summary of Directive

The Handbook was first printed in September 1983 as an interim version. The Superfund Community Relations office is now in the process of revising and finalizing this Handbook. A draft version will be distributed for internal Agency review this Winter and the public for comment this Spring and Summer. The final Handbook will be completed in the fall of 1986 and will supersede both interim & draft.

(Signed H. Longest, 5 March 1986)

Use 9230.0-3, "Community Relations in Superfund: A Handbook, Interim Version" until issuance of final

Type of Directive (Manual, Policy Directive, Announcement, etc.)

Manual

Status

☐

Draft

☐

Final

☐

New

☒

Revision

Does this Directive Supersede Previous Directive(s)?

☒ Yes

☒ No

Does It Supplement Previous Directive(s)?

☐ Yes

☐ No

If "Yes" to Either Question, What Directive (number, title)

Community Relations in Superfund: A Handbook -

Interim Version September 1983 (HW-6) 9230.0-3 - use until Handbook is final

Review Plan

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AA-OSWER

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OUST

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OECM

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Other (Specify)

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Regions

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OPPE

This Request Meets OSWER Directives System Format

Signature of Lead Office Directives Officer

Date

Nancy Livingston

1/29/86

Signature of OSWER Directives Officer

Henry Longest

2/1/86



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WASHINGTON, D.C. 20460

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OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

OSWER Directive Number
9230.0-3A

MEMORANDUM

SUBJECT: Revised Superfund Community Relations Handbook

FROM: Henry Longest II, Director
Office of Emergency and Remedial Response

TO: Addressees

Attached is a draft of the revised version of "Community Relations in Superfund: A Handbook." This draft Handbook is being circulated for internal Agency review. The Handbook, first issued in 1983, has now been thoroughly revised to reflect the additional experience we have gained in conducting community relations at Superfund sites throughout the nation. The revised Handbook places an increased emphasis on two-way communications in community relations activities. In particular, it stresses the need to identify early in the Superfund process how communities would like to be involved in site activities.

Based on our experiences during the last three years, this draft Handbook introduces new requirements and concepts in the program. I would like to bring your attention to the following:

- ° Information Repository Requirement: The draft Handbook establishes as a program requirement the creation of at least one information repository at each NPL site where remedial response actions are to commence and at sites where a removal action is expected to extend beyond 45 days. (These are the same sites for which a community relations plan must be prepared.) For remedial sites, the information repository must include the community relations plan, the RI/FS workplan, the remedial investigation report, the feasibility study, the responsiveness summary, the signed record of decision (ROD), and the remedial design. For removals lasting longer than forty-five days, the information repository must include the community relations plan.
- ° New Community Relations Plan Format: The draft Handbook recommends a new format for the Superfund community relations plan. This format emphasizes the description and analysis of the community, rather than the technical history of the site. In addition, the plan would include site-specific objectives for community relations, rather than repeating the overall goals of the community relations

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- ° New Community Relations Techniques: The section which provides information on techniques has been considerably expanded to include several innovative and successful techniques for actively seeking community involvement at Superfund sites. Many of these techniques have been used by Regional and State offices. Examples of these new techniques include the use of on-site information offices, observation decks from which interested community members can view site activities, and a Superfund briefing book for the press. The applicability of potential techniques, both established and new, has also been broadened to include all phases of a Superfund response -- from preliminary assessment through remedial action and operation and maintenance.

Because the Superfund Community Relations Program is growing and changing to reflect our increasing experience and community needs, it is inevitable that some of the discussion in this Handbook cannot be considered as final. Four sections of this Handbook should be read with the awareness that changes or additional guidance will be forthcoming and will be incorporated into the final version:

- (1) Responsiveness Summaries: An EPA Headquarters and Regional work group recently met to discuss the purpose, format, and timing of responsiveness summaries and how they relate to other program documents, in particular, the ROD/EDD and the enforcement "administrative record". The guidance on responsiveness summaries in this draft Handbook reflects the discussions of this work group, although additional clarification on responsiveness summaries will be issued shortly from EPA Headquarters.
- (2) Community Relations during Enforcement Actions: The guidance in this Handbook relating to enforcement actions (Chapter 6) should be supplemented by the Office of Waste Program Enforcement (OWPE) clarification memo, August 28, 1985, "Community Relations during Enforcement Actions." In addition, OWPE is developing policy to guide enforcement actions in which a third-party (e.g., Clean Sites, Inc.) is facilitating a response. This guidance will discuss community relations during such third-party participation.
- (3) Dispute Resolution as a Community Relations Technique: A section has been reserved in this Handbook for the discussion of dispute resolution as a technique for addressing conflicts at controversial Superfund sites.

A pilot program is currently being conducted by EPA Headquarters to evaluate the effectiveness of this technique at selected Superfund sites across the country. The Handbook will be modified to reflect this evaluation, once the pilot project is completed in the Spring of 1986.

- (4) Superfund Innovative Technology Evaluation Project (SITE) - Community relations plan guidance for sites where innovative technology will be demonstrated is currently under development.

As part of the revision process, this draft Handbook will be changed and improved by your review. We would like to have your comments and suggestions on this draft, and encourage you to submit a marked-up copy as soon as possible. Your comments should be submitted by April 11, 1986, to Daphne Gemmill, Program Manager, Superfund Community Relations Program (WH-548A), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, D.C. 20460.

After the Handbook is revised based on your comments, it will be widely distributed to other government agencies, public interest, labor, and industry groups for review. We also are contemplating a series of Regional workshops to solicit public comment during the spring and summer. The Handbook should be in final by Fall 1986. We look forward to your contributions.

Attachment

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Director, Air & Waste Management Division, Regions IV, VI, VII & VIII
Director, Waste Management Division, Regions I & V
Director, Toxics and Waste Management Division, Region IX
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Solid Waste and Emergency Response



Community Relations in Superfund: A Handbook

Interim Version

September 1983

COMMUNITY RELATIONS IN SUPERFUND

A HANDBOOK

United States Environmental Protection Agency

Office of Emergency and Remedial Response

September 1983 Interim Version

NOTE

This handbook was prepared by ICF Incorporated for the Office of Emergency and Remedial Response, U.S. Environmental Protection Agency (EPA), under EPA contract 68-02-3669. It was revised and approved through the EPA Peer and Administrative Review Control System. Peer reviewers were Anthony Diecidue, L. Michael Flaherty, Inez Artico, Marcia Carlson, and Richard Hoffman.

This handbook serves as program guidance for conducting community relations activities in the Superfund program. It incorporates EPA policy on community relations that is not expected to change, although details of the handbook may be modified in the future to reflect experience with a developing program. Questions and comments concerning this handbook should be addressed to Daphne Gemmill, U.S. Environmental Protection Agency, 401 M Street, S.W., Office of Emergency and Remedial Response (WH-548D), Washington, D.C. 20460.

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INTRODUCTION

The Superfund* community relations program encourages two-way communication between communities affected by releases of hazardous substances and agencies responsible for cleanup actions. The program attempts to provide communities with accurate information about problems posed by releases of hazardous substances; at the same time, it gives local officials and citizens the opportunity to comment on and provide input to technical solutions to site problems. An effective community relations program must be an integral part of every Superfund action.

Hazardous waste sites and other releases of hazardous substances have the potential to create strong public concern about government action. The health and environmental problems stemming from releases of hazardous substances are inherently sensitive.

A community relations program can enable government staff to take community concerns into account in planning a response and the result can be a better response action. At the same time, it can ensure that citizens have accurate information about the response. It is consequently an essential component of a successful Superfund response action.

This handbook offers specific guidance for EPA and state staff on how to design and implement an effective community relations program. The handbook presents guidelines for developing community relations programs for removal actions (Chapter 2) and remedial actions (Chapter 3). Chapter 4 discusses the advantages and disadvantages of various activities that may be included in a community relations program. The handbook explains the administrative requirements for the program (Chapter 5). Chapter 6, which provides guidance on managing community relations activities during enforcement actions, will be added to the handbook at a later date. Appendix A discusses how to draft community relations plans and presents examples of community relations plans for removal and remedial actions. Appendix B provides guidance on how to conduct on-site discussions with local officials and citizens and on how to assess community concerns on the basis of these discussions. A community relations program quarterly report format is contained in Appendix C. Appendix D lists the EPA Headquarters and Regional Office staffs responsible for community relations program management and implementation. At a later

*Superfund is the \$1.6 billion fund created by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for responding to releases or threats of releases of hazardous substances. This handbook also uses the term "Superfund" to describe the response program established by the Environmental Protection Agency under CERCLA's authority.

CHAPTER 1

AN EFFECTIVE COMMUNITY RELATIONS PROGRAM

This chapter describes the background and objectives of the Superfund community relations program. First, it defines the program and describes how EPA derived the guidelines presented in this handbook. It then explains how the program can enhance the ability of EPA and the states to implement cost-effective removal and remedial actions.

A. PROGRAM DEFINITION

The Superfund community relations program is a site-specific information and communications program that must be an integral part of every Superfund-financed remedial or removal action. When EPA (or a state under a cooperative agreement with EPA) decides to fund a Superfund response action lasting longer than a few days, it must develop a community relations plan (CRP) that details:

- How citizen concern will be identified and assessed at the site;
- How accurate information on problems associated with the release of hazardous substances ~~will be~~ distributed and explained to the community;
- How citizens will have an opportunity to comment on and provide input to ongoing and proposed site work; and
- How the technical alternatives and the proposed technical solution will be explained to the community.

Specific activities listed in the CRP for soliciting citizen input and distributing information vary from site to site, depending upon the level of citizen concern and the nature of the site's technical problems. The responsible agency (either EPA or the state) implements the plan, in close coordination with other interested agencies.

All site-specific activities that encourage communication between communities affected by releases of hazardous substances and agencies responsible for cleanup together constitute EPA's Superfund community relations program. The program's evolution and objectives are described below.

for responding to releases or threatened releases of hazardous substances, pollutants, or contaminants from vessels or facilities. Although the \$1.6 billion response fund (Superfund) created by CERCLA seems large, the cost of responding to releases is also large and there are many problems in need of attention. Thus, for remedial actions, the National Contingency Plan requires the lead agency for any site action to choose the most cost-effective remedial alternative to address the site's problems. It may be necessary, therefore, to explain to a community that a balance must be struck between the need to protect public health, welfare, and the environment at any one site, and the need to conserve the Fund for responding to problems at other sites.

A successful community relations program is a preventive effort. EPA has found that a measure of prevention is critical to implementing a cleanup of a hazardous substance release. Every site action has the potential to become difficult to manage if communication is poor between EPA or the state government, local governments, interest groups, and citizens. People who are worried about releases of hazardous substances and believe that the government has not considered their concerns may press for additional -- and more costly -- relief. Regardless of the technical adequacy of a proposed response, it may prove unacceptable to the local public. The best way to lessen the chance that citizens might reject a cost-effective solution is to identify citizen concerns, take these concerns into consideration when fashioning a solution, and explain the rationale behind the course of action chosen.

The community relations guidelines outlined in this handbook should enhance EPA's and states' abilities to implement cost-effective removal and remedial actions in communities across the nation. A community relations program can ensure that the concerns and questions of citizens are not neglected, but are incorporated into the decisionmaking process. It can lessen the chances for the spread of rumors or misconceptions about the nature of the threat at the site.

The objectives of the Superfund community relations program, consequently, are as follows:

- **Gather information about the community in which a site is located.** A community relations program provides a vehicle for exchanges between EPA, the state, the public, and local government. It enables EPA and state staff to identify citizen leaders, public concerns, and a site's social and political history. Sometimes it can also yield technical data useful in planning a solution to the site's problems -- or information useful in an enforcement case against a responsible party.
- **Inform the public of planned or ongoing actions.** The program should inform the public of the nature of the environmental problem, the remedies under consideration, and the progress already made.

CHAPTER 2

COMMUNITY RELATIONS DURING IMMEDIATE AND PLANNED REMOVALS

This chapter provides a brief guide to the kinds of community relations activities that can be undertaken during immediate and planned removals. Whether the technical problems encountered during a removal action are simple or complex, the social, political, economic, and psychological effects of the action on the community can be dramatic. Citizens will want information about the effects of exposure to hazardous substances upon their health and environment. In addition, citizens must be given the opportunity to express opinions and concerns about a removal action in their community. Finally, citizens should be informed about the restrictions CERCLA and the National Contingency Plan place on removal actions.

The purposes of the communications techniques discussed in this chapter are to: (1) help EPA identify and assess citizens' perceptions of the health and environmental threat; (2) give citizens an opportunity to comment on and provide input to the selection of a response action, when feasible; and (3) help community relations staff choose effective methods for distributing and explaining information on removal actions. Readers should consult Chapter 4 for detailed explanations of the techniques suggested in this chapter. Chapter 5 describes community relations planning requirements for removal actions, and Appendix A provides formats for planning documents.

A. IMMEDIATE REMOVAL ACTIONS

1. Need for Communication

EPA may decide to undertake an immediate removal action in those situations where immediate action will prevent or mitigate immediate and significant risk of harm to human life or health or to the environment. (See Section 300.65 of the National Contingency Plan for a definition of immediate removal actions.) The On-Scene Coordinator's (OSC's) principal responsibility in an immediate removal is to protect public health and property until the emergency is abated. During such an incident, the primary community relations activity is to inform the community about response actions and their effects on the community.

The specific types of community relations activities during immediate removals are likely to include responding to inquiries from the media, providing local officials with the knowledge necessary to handle the questions of their constituents, and giving information directly to concerned citizens. By channeling community inquiries to the appropriate agency or official, the community relations program can ensure that the community receives the vital

3. Suggested Community Relations Activities

Community relations programs for immediate removals should take into consideration that the immediate removal may be only the beginning of a lengthy presence in the community. It is possible that a planned removal or remedial action will follow at a site. Thus, the OSC's actions during an immediate removal may have long-term consequences for EPA or state effectiveness during future operations at the site.

To ensure that the community is given accurate information in a timely and efficient way during an immediate removal, OSCs and Regional OPA staff should work with other Superfund program and state staff to:

- Designate a single contact to handle all public inquiries.
- Provide sufficient telephone lines and staff to support the designated public contact and publicize the phone number in the local media.
- Contact immediately local officials, the Governor's Office, and interested Congressional officials; provide these officials with information about the release and the immediate removal action.
- If sufficient interest exists, hold a news conference or briefing to explain problems caused by the release and the plans for the immediate removal action. Also, establish a repository for site information at a local library, health office, or community center with approved technical reports, official phone numbers, and the immediate removal CRP.
- If sufficient time exists, periodically hold small meetings with local officials and groups of interested citizens as early in the response action as possible.

There will be times when an immediate removal is taken at a site that has long been a recognized problem and that is familiar to community relations staff. For example, an immediate removal can be preceded by an assessment period, or it can be taken midway through a remedial action. In such cases, some of the preparatory work for a community relations program may already have been accomplished. Local officials and citizens will be aware of the need for action and may have a good idea of what to expect when work begins at the site. Similarly, community relations staff may be well acquainted with the special concerns of people living near the site. In these cases, the community relations program can concentrate on public consultations and briefings and news conference updates.

the purpose of the action is to provide a permanent remedy to the problem, one that will involve the removal of all hazardous substances from the site. If they are allowed to generate such expectations, they will be frustrated if the planned removal is only a provisional response. At an early stage, therefore, it is critical to prevent the development of unrealistic expectations. Early on-site discussions can be a key factor in developing accurate expectations.

2. Assess the nature of citizen concern.

After completing the on-site discussions, community relations staff must assess the nature and level of citizen concern at the site. Such an assessment allows staff to match communications activities both to the technical schedule of the response action and to citizens' information needs and concerns. One method of assessing citizen concern is detailed in Chapter 4 and explained further in Appendix B.

3. Describe citizen concerns, community relations activities, timing, and resource needs in a CRP.

In addition to a thorough assessment of citizen concerns, the CRP must include: a description of specific objectives for the program; a list of all communications activities planned for the site; a detailed workplan and budget; a staffing plan; a schedule of activities; a list of interested citizens; and a list of technical and community relations staff responsible for the site.

Chapter 4 describes a number of communications techniques that can be used in a community relations program at a planned removal or remedial action site. Given the limited nature of a planned removal, however, many of these techniques may not be needed or appropriate. Community relations staff should use discretion in determining which activities would be effective at a particular site. In general, the following activities are suggested for a planned removal:

- **Briefings for local officials and the media.** Briefings on the planned removal action are essential at an early point in the action. They are useful for providing information about any health or environmental problems posed by the site and for informing the public about the proposed response action.
- **Public meetings and workshops.** In general, meetings and workshops should be small and informal. They should be held as early in the response action as possible, and should be used both to identify citizen concerns and to solicit citizen comments on the response action. Investigations of community involvement at sites in every EPA Region suggest that small meetings and workshops are very effective for

5. Prepare a responsiveness summary.

When the planned removal is concluded, a final report or "responsiveness summary" must be prepared and should be submitted to the Office of Policy and Program Management in the Office of Emergency and Remedial Response, EPA Headquarters. This in-house report must describe the community relations activities conducted and the major issues that arose at the site. In addition, it must evaluate the effectiveness of the community relations program at the site. The purpose of the report is to document EPA and state actions, to assist in community relations planning in the event that long term remedial response occurs at the site, and to help plan for subsequent community relations programs at other sites. The summary may be used to help document for the public record how EPA responded to key community concerns and issues.

CHAPTER 3

COMMUNITY RELATIONS DURING REMEDIAL RESPONSE

This chapter provides guidelines for conducting community relations activities during remedial actions. Remedial actions are those responses to releases on the National Priorities List that require longer term and possibly more expensive efforts to prevent or mitigate the migration of releases of hazardous substances. (See the definition of remedial response in Section 300.68 in the National Contingency Plan.) **A community relations program is a key part of EPA and state activities during a remedial action.** As pointed out in Chapter 1 of this handbook, without a program of ongoing communication between the community affected by the release of hazardous substances and the agency responsible for cleanup, EPA and the state cannot provide accurate, understandable information to the community about site problems and cannot incorporate community concerns into decisions about response actions.

When the federal government has lead responsibility for a remedial action, the U.S. Army Corps of Engineers will usually be responsible for management of remedial construction. Community relations, however, will continue to be the responsibility of EPA during all stages of the response; the state may play a supporting role. When the state has the lead responsibility for the remedial action, EPA staff will review state programs and may participate in community relations activities, as specified in the cooperative agreement. Therefore, community relations during a remedial response may involve the efforts of three or more agencies: EPA or state staff will manage the program, and in certain cases, the Corps of Engineers will provide technical assistance. In addition, other federal or state agencies may be responsible for certain aspects of a response, with corresponding responsibilities for community relations. The Federal Emergency Management Agency, for example, manages Superfund-financed relocations of residents and businesses, when necessary.

The blueprint for community relations programs at remedial action sites is the community relations plan (CRP). This chapter discusses communications activities that could be incorporated into a CRP for a remedial action.* These activities or techniques, suggested here as general guidelines, correspond to each of the technical stages of a remedial response. In practice, however, a remedial action may not be as neatly structured as this

*Staff responsible for community relations planning should also consult Chapter 5 and Appendix A for a detailed summary of remedial action planning requirements.

of future events. Staff should emphasize the tentative nature of any plans and should stress that the inspection should not be viewed as evidence of a serious contamination problem. Community relations staff should inform the community through a brief fact sheet that the site inspection is limited in scope, and is intended primarily to gather any data needed for ranking on the National Priorities List.

3. Priority Listing and First Notification of Proposed Course of Action

Community relations efforts become critical once EPA has set priorities and evaluated a site for remedial action. At this point, EPA or state staff must conduct on-site discussions with local officials and citizens, evaluate the nature and level of citizen concern, and determine how the remedial investigation and feasibility study may affect citizen concerns. The on-site discussions and the assessment of citizen concern will become the foundation of the CRP for the site. These activities are described below.

3.1 On-Site Community Discussions

Site problems go beyond the physically measurable, technical problems of hazardous waste releases. The community setting of the hazardous substance problem must also be understood before investigating the problem and proposing a technical solution. Community relations staff should, therefore, conduct a series of short on-site discussions with the state and local officials involved with the site, citizen leaders representing interest groups, business leaders, environmentalists, members of other community groups such as the League of Women Voters, and any other interested citizens. The information gleaned from these discussions may enhance the technical understanding of the site if local officials and residents know of past dumping practices. In addition, these discussions can provide valuable information about local attitudes toward the site and past government actions. Thus, these discussions provide an opportunity for public input to the planning process. They also enable community relations staff to identify the best means to provide information to the community during the response action.

3.2 Assessment of Citizen Concern

On the basis of these community discussions, community relations staff should assess the nature and level of citizen concern about the site. (See Chapter 4, Assessment of Citizen Concern: A Procedure and Appendix B.) An evaluation of the following factors can help staff determine how the level of citizen concern at a site compares to concern at other sites, and whether concern is likely to increase or decrease over the course of the action:

- Whether families in a community believe their children's health may be affected by the release;

The analyses of how the level of technical complexity and the proposed timing of response actions affect the selection of communications activities for the site should also be described briefly in the CRP.

3.4 Preparation of the CRP

Having completed the on-site discussions and the assessments of citizen concern and technical complexity, the community relations staff must then prepare a draft CRP. The draft CRP must be submitted with the draft Action Memorandum for federal-lead sites or with the draft cooperative agreement for state-lead sites. It must include:

- A description of the site's background and the background and history of community involvement at the site;
- Community relations objectives for the site during the remedial investigation and feasibility study;
- Any immediate community relations activities recommended prior to approval of the complete CRP;
- A list of affected and interested groups and individuals, their affiliations, addresses, and telephone numbers;
- A schedule for completing the CRP; and
- The date the draft CRP was prepared.

The draft CRP will form the basis of the complete CRP which must be submitted: (1) for federal-lead sites, within four weeks of the submission of the draft Action Memorandum or prior to the initiation of the remedial investigation, whichever comes first; or (2) for state-lead sites, with the final cooperative agreement package. The complete CRP must include:

- The information presented in the draft CRP, updated if necessary;
- A specification that the public will be given a **minimum three week comment period** to review the feasibility study prior to the selection of the recommended alternative and an explanation of how this comment period will be structured;*

*At the time the CRP is drafted, staff may know that an initial remedial measure (IRM) will be needed at the site. Where an IRM will be needed, the CRP must address how the community will receive prior notification of any action. In addition, the CRP must state that citizens will have an opportunity to comment on any recommended complex IRM at the conclusion of a limited feasibility study, and must explain how a minimum two week comment period will be implemented. See Section 5 of this chapter for further detail.

tools is to designate a Superfund community relations coordinator for the site to channel both citizen and intergovernmental contact. Diplomatic skills on the part of the coordinator are very important; being a good engineer or program manager alone is not enough for this sensitive position. The coordinator must be available to hold meetings and be interviewed after office hours, when residents may likely be available. It is not necessary that the community relations coordinator be present at the site everyday; however, the coordinator's schedule should be well-publicized.

Useful forms of citizen-agency interaction during the remedial investigation stage that should be specified in the CRP include:

- Informal meetings for distributing significant test results or other information about the response action;
- Meetings with individual citizens or groups of citizens affected by any results of health studies;
- Briefings of local officials and state and federal legislators;
- Public consultations and workshops, where community relations staff meet with small groups of citizens to keep abreast of community concerns and pass on information;
- Progress reports, fact sheets and news conferences;
- A repository for site information at the local library, health office, or community center that contains approved technical documents, official phone numbers, and the CRP;
- Site visits.

The use of an information repository is encouraged and should be established as soon as the state contract or cooperative agreement is signed.

It is possible that local citizens will not want to become involved in and extensively informed about the problem of hazardous substances at this stage. Alternatively, some citizen groups will make early and possibly large demands for resources on any agency that indicates an interest in helping the community. The coordinator should frequently assess the changing information needs of the community, and if necessary, modify the CRP to reflect these changing needs.

5. Feasibility Study: Development and Selection of Alternatives

A major community relations effort must accompany the development of cleanup alternatives during the feasibility study and the selection of the

the availability of the feasibility study and request written comments on the remedial alternatives. During the comment period, the coordinator should review with the community the advantages and disadvantages of the alternatives under consideration. Notice should be given of where written comments should be sent and the deadline for submission. The CRP must detail how the public will be provided opportunity to comment.

The comment period policy for initial remedial measures (IRMs), or those actions that can be taken quickly to limit exposure or threat of exposure to a significant health or environmental hazard during remedial planning, is similar: EPA must provide the affected community with information about the action and must elicit community views and concerns. **When the needed action consists of simple IRMs,* no comment period is required but EPA must provide advance notification of the action to the community.** Community relations staff should identify the most effective way(s) to inform the community of the action and to respond to citizen concerns. News conferences or news releases, combined with door-to-door contacts, phone conversations, or small group meetings, could be effective ways for providing information and for identifying community issues.

When a complex IRM is recommended following an expedited remedial investigation and feasibility study, the community relations staff must not only notify the community of the recommended action, but must also provide a minimum two week comment period. This comment period may be lengthened if the community requests an extension as long as the extension does not exacerbate threats to public health, welfare, or the environment at the site. During this comment period, community relations and technical response staff should hold small group meetings or workshops, provide fact sheets, or engage in other activities that explain the conclusions of the limited feasibility study to the community.

The alternative remedies for nonexpedited or expedited feasibility studies may be presented and reviewed at a public meeting or a formal hearing where public comment is invited. As noted above, **large public meetings or formal hearings are not necessarily encouraged**; small informal meetings and the other communications techniques listed above are encouraged instead because they are more effective in most situations. If community relations staff determine that a public meeting or hearing is necessary at this stage

*Simple IRMs include: staging/overpacking drums; runoff controls; site security measures; dike/berm stabilization; fences; temporary covers; drum/tank sealing; and temporary relocation.

**Complex IRMs include: measures such as off-site transport or disposal of drums/tanks; off-site transport or disposal of lagoon liquids; sludges and highly contaminated soils; leachate treatment; and temporary water supplies.

- Public service announcements on radio or TV;
- News releases;
- Fact sheets and progress reports; and
- A continuation of the local information repository.

The purpose of these activities is to explain to local officials and citizens the activities that will take place during engineering design, and once design is completed, to explain in understandable terms the design conclusions and construction proposal.

7. Construction

During site construction, the community relations coordinator should continue to inform area residents and businesses of the progress of construction, any health hazards that may be caused by construction, suitable hazard precautions, economic effects, new findings, and the reasons for any delays in the cleanup. To ensure that the local public is adequately informed, the community relations coordinator must provide site information to local officials and citizen leaders on a frequent basis. Appropriate techniques at this stage continue as before:

- News releases, fact sheets, and progress reports;
- Briefings for officials;
- Public consultations and small informal meetings;
- Site tours; and
- A continuation of the local information repository.

Community relations staff must also make sure local residents understand that cleanup of the site may not resolve all problems. Meetings with small groups of citizens and officials to explain the likely results of the remedial action may again be the most effective communications technique during this stage of the response action.

8. Post Cleanup Documentation

Upon completion of the cleanup, the EPA staff must evaluate EPA's and the state's interaction with the local government, interest groups, and citizens. This includes the preparation of a responsiveness summary that should be submitted within one month of the completion of the response action to EPA Headquarters. A responsiveness summary may help prevent problems at other sites; it will also suggest ways to continue public awareness at the completed site.

EXHIBIT 3-1

REMEDIAL RESPONSE AND COMMUNITY RELATIONS ACTIVITIES*

Step	Community Relations Activities
Preliminary Assessment	Telephone contacts, telephone discussions with officials and key citizens
Site Inspection	Brief fact sheet
Priority Listing and First Notification of Proposed Action	On-site community information discussions Assessment of citizen concern
Remedial Investigation	Fact sheet, progress report Briefings, workshops, and public information meetings News conferences Information repository
Feasibility Study	News release Fact sheet, progress report Public consultations Briefings, workshops, and public information meetings Information repository Comment period
Remedial Design	Fact sheet, progress report, or briefing News releases Small meetings, workshops Information repository
Remedial Construction	News releases Fact sheet, progress report Briefings Site tours Information repository
Post Cleanup Documentation	Small meetings and briefings

*The community relations activities listed are examples of techniques that may be effective at Superfund sites. Community relations staff should select communications techniques that are consistent with the nature of community concern and the technical response schedule.

CHAPTER 4

EXAMPLES OF COMMUNITY RELATIONS TECHNIQUES

This chapter describes the purposes, benefits, and limitations of the community relations techniques that **may** be used in a Superfund response. It supplements Chapters 2 and 3, which explain when these techniques should be used during a removal or remedial action. The following techniques are discussed:

1. Telephone Contacts
2. On-Site Discussions
3. Assessment of Citizen Concern: Procedure
4. Briefings
5. Citizen Group Meetings
6. Exhibits
7. Fact Sheets/Progress Reports
8. Formal Public Hearing
9. Media Appearances
10. Presentations
11. News Conferences
12. News Releases
13. Site Tours
14. Public Consultations/Small Group Meetings
15. Public Inquiry Responses
16. Public Meetings
17. Workshops
18. Information Repository/Project File

As emphasized in Chapters 2 and 3, the key to a successful community relations program is targeting activities to the distinctive needs of the community. Therefore, **not all of the techniques described in this chapter are appropriate for every response action.** Appendix A describes further the importance of selecting the appropriate mix of techniques in the development of a **site-specific** community relations plan (CRP).

This chapter does not present an exhaustive discussion of public participation techniques. Readers should consult public participation manuals, such as the manuals prepared for EPA's water programs, for detailed information.

1. TELEPHONE CONTACTS (continued)

TECHNIQUE (continued)

- **State health departments:** Health officials may have received complaints from citizens concerning the safety of a site. They may also know about active community groups that have addressed the hazardous substance problems in the state. Moreover, these officials will know about any state sponsored health effects studies or monitoring conducted at the site.
- **State environmental or pollution control agency** (and equivalent offices at the city and county level): Contacting state or local pollution control officials can be most effective for finding out about concerned citizens. Often, local resident and community groups have contacted officials at this level seeking answers to questions about potential hazards, etc. These officials can also provide impressions of citizen expectations.
- **Local elected officials** (mayors, city managers, etc.): They can explain not only what the citizens want, but also what steps, if any, have been taken to satisfy citizen demands. These officials can often put citizen concerns in perspective, identifying how important or unimportant the hazardous substance problem is to the community as a whole.

BENEFITS

Telephone calls can be an inexpensive and expedient method of acquiring initial information about the site. During immediate removals, the telephone contacts can help the OSC identify and deal with community concern when time for more thorough community relations activities is not available. In remedial response actions, telephone interviews will often be useful for establishing a network of contacts to be used later during on-site community discussions.

LIMITATIONS

The information received through telephone calls may not be accurate. The public may not know much about the site except what has been circulated in rumors or newspaper articles.

2. COMMUNITY INFORMATION DISCUSSIONS (continued)

TECHNIQUES (continued)

Meeting with local government officials: Interviews with government officials should include a brief introduction explaining why they are being interviewed and what kind of information is needed (site history, government activity at the site, a political perspective on citizen's expectations, etc.).

Meeting with residents and community groups: Interviews involving local residents or community groups are likely to require more time. Be prepared with a discussion guide -- questionnaires are too formal and are likely to elicit curt responses. Be sensitive to the residents' needs but remind them that the purpose of the interview is to gather preliminary information to be used in planning response actions and appropriate citizen participation programs. In this way, unrealistic expectations are not raised.

In many cases, the interviewee will ask questions and express concerns about the site. With adequate preparation, the interviewer can thus acquire information useful for later planning, as well as respond to initial citizen concern with accurate information and allay unwarranted fears.

Confidentiality: At the beginning of each discussion, explain that the report will be presented to EPA or state officials and other interested persons. If the interviewee would like to remain anonymous, explain that the information will be used to understand community concerns and that a record of the contact will be made, but EPA or the state will not attribute any specific statements or information to the interviewee.

Other possible contacts: During the discussions, ask for names and phone numbers of persons who could provide additional information on the site.

Information on citizen participation activities: Ask whether the interviewee would like to receive any fact sheets or other printed information as the response action continues. Also, for future reference, keep a list of persons interested in attending public consultations and public meetings.

3. ASSESSMENT OF CITIZEN CONCERN: PROCEDURE

- ACTIVITY** An assessment of citizen concern about the release of hazardous substances. Information derived from this procedure can assist officials in estimating the level of effort to devote to community relations at the site.
- PURPOSE** To provide additional information on the level of community concern. This procedure may be useful in:
- Assessing local concerns where no previous contacts with the community have been made;
 - Confirming the judgments of field personnel on the level of concern in a community; or
 - Reassessing preliminary judgments about citizen concern.
- TECHNIQUE** This procedure is best used after the completion of the community information discussions, performed by community relations staff or a contractor. These on-site discussions provide background information and indicate future directions of local concern. If initial assessments of citizen concern have already been made, an accurate assessment of concern may require follow-up telephone calls to local officials and citizen leaders to update the information about the community.
- Superfund officials may assess whether community concern at a site is high, medium, or low by determining the presence or absence of six characteristics after interviewing members of the local community. An analysis of citizen concerns at hazardous waste sites has shown that some of these characteristics are more important than others in determining the level of concern in a site community. The characteristics are:
- **Children's health** -- whether families in the community believe their children's health may be affected by the hazardous substances;
 - **Economic loss** -- whether local homeowners or businesses believe that the site has caused them or will cause them economic loss;
 - **Agency credibility** -- whether the performance and statements of EPA and the state are viewed by the public as competent and credible;

4. BRIEFINGS

- ACTIVITY** Sessions held with local government officials, often before a news conference. Should precede meetings and workshops held with local citizens.
- PURPOSE** **Removal Action:** To notify officials of the nature and reasons for the action and to keep them informed of recent developments at the site.
- Remedial Responses:** To inform officials and other interested parties about recent developments at the site, to provide them with background material on the technical studies, results of the field investigations and engineering design, and to report to them on proposals and planning for remedial action.
- TECHNIQUE** Inform local officials or other attendees, generally 2 weeks before a scheduled briefing, that a briefing concerning recent activities at the site or other related topics will occur. It is usually best to hold the initial briefing in the office of the officials or at a local meeting room. Subsequent briefings should be held at a convenient time and location.
- Present a short, official statement** about the preliminary findings from the site activities (inspections, investigations, engineering design, etc.) and the EPA/state decision process, and announce future steps in the process.
- Answer questions** from local officials and other attendees about the statement. Anticipate questions; be prepared to answer them without getting involved in minor details and subjective judgments.
- BENEFITS** Because briefings are often held in conjunction with news conferences, they are useful in educating the local officials and other interested parties about the topics of the upcoming news conference.
- LIMITATIONS** Bad feelings or bad publicity could result if some individuals who believe they should be invited to the briefings are not. Care must be taken not to exclude these persons, or otherwise to convey an impression of favoritism towards other interested parties.

6. EXHIBITS

ACTIVITY Setting up visual displays of maps, charts, diagrams, or photographs. These may be accompanied by a brief text explaining the displays and the purpose of the exhibit.

PURPOSE To illustrate issues associated with hazardous substance problems in a creative and informative display.

TECHNIQUE Identify the target audience and the message to convey.
Possible audiences:

- General public
- Concerned citizens
- Environmental groups
- The media
- Public officials

Possible messages:

- Description of the site
- Historical background
- Proposed remedies
- Health and safety effects associated with the site

Determine where the exhibit will be set up. For example, if the general public is the target audience, assemble the exhibit in a highly visible location, say a public library, convention hall, or a shopping center. On the other hand, if concerned citizens are the target, set up an exhibit perhaps at a public meeting. An exhibit could even be as simple as a bulletin board at the site or trailer if this is a convenient communications location.

Design the exhibit and its scale according to the message to be transmitted. Include photos or illustrations. Use text sparingly.

BENEFITS Exhibits tend to stimulate public interest and understanding. While a news clipping may be glanced at and easily forgotten, exhibits have a visual impact and leave a lasting impression.

7. FACT SHEETS/PROGRESS REPORTS

- ACTIVITY** A brief progress report on an issue of concern to the community. Includes summaries of past site work and details of upcoming activities. Must be distributed to government agencies with an interest in the site, area residents, citizen groups, the media, and other interested parties on a regular basis (at least monthly when there is a high level of citizen concern at a site).
- PURPOSE** To ensure public understanding of the issues involved in the response program and to present information on the progress and results of the removal or remedial action.
- TECHNIQUE** Identify information to be transmitted. The fact sheet may include the location of the site, the types or quantities of substances known to be at the site, the potential problems at the site, or an explanation of what EPA or the state intends to do about the site. Address recurring questions or issues of apparent concern in the fact sheet.
- Select a simple format for transmitting progress reports and maintain consistency with that format. The fact sheet may simply state the facts or present the message using a question-and-answer format. Avoid using bureaucratic jargon or highly technical language because the audience is likely to be made up of individuals with widely-varying backgrounds.
- Be concise. The purpose of the fact sheet is to provide facts, not opinions. Fact sheets are not the only way to keep the community informed of technical developments.
- Include names and phone numbers of the person or office issuing the fact sheet and of other persons to contact for further information. Date the fact sheet to accommodate future references (e.g., for changes or updates).
- BENEFITS** The fact sheet provides interested persons with a brief summary of facts and issues involved in the cleanup operations.
- LIMITATIONS** If not well-written, a fact sheet, with its brief format, could be misleading or confusing. Such problems could cost much in time and resources.

9. MEDIA APPEARANCES

ACTIVITY Live or taped interviews, or discussions held with local or national television or radio personnel.

PURPOSE To keep the public informed of what EPA or the state is doing about the release of hazardous substances.

TECHNIQUE The need for participating in a media event should be carefully evaluated. Do not draw attention to a problem that seems insignificant to most citizens, especially if the community is already sensitive about the attention it is getting.

On the other hand, if the community is unaware of or confused about the magnitude of the situation, broadcasts can reach a wide audience.

Plan exactly what to say ahead of time. Live interviews leave no room for mistakes or statements that might need to be retracted later.

BENEFITS A media appearance reaches a wide audience and permits only the most important issues to be covered.

LIMITATIONS A media appearance can unintentionally turn into a regrettable event if critical facts are misstated or the impression is conveyed that EPA or the state is not concerned about issues important to the community.

Another limitation is that media appearances, although they allow response to a reporter's inquiries, do not allow a response to individual citizen concerns; there is no immediate feedback from the audience. This limitation can be mitigated somewhat by reviewing, prior to the media appearance, previous assessments of citizen concerns.

10. PRESENTATIONS (continued)

BENEFITS Because the presentation is delivered in person, the audience has a chance to ask questions, and EPA or the state has an opportunity to gauge citizens concerns.

Another benefit is that a group of people is reached at one time, alleviating the need for responding to individual inquiries.

LIMITATIONS It may be difficult to deviate from the format of the presentation to accommodate different concerns of the audience. These concerns will have to be addressed during a question-and-answer period after the presentation.

If a presentation is too long or not understandable to an audience, the audience may lose interest and become frustrated by an inability to obtain needed information in an efficient way.

11. NEWS CONFERENCES (continued)

TECHNIQUE
(continued)

Do not overuse news conferences. Other forms of communication, such as news releases, fact sheets, and public consultations and meetings will be used to report the results of the site inspection, field investigation, and EPA or state decisions. Drawing attention to preliminary results of technical studies may fuel unnecessary citizen fears or unreasonable citizen demands.

Gear the news conference to the magnitude of the problem at the site.

BENEFITS

News conferences provide a public forum for EPA and the state to announce plans and developments. They provide media coverage and are an inexpensive way to reach large numbers of citizens. By preparing a written statement, officials can help ensure that the facts are presented accurately to the media. During the question period, the EPA or state spokesperson can demonstrate knowledge of the site and may be able to improve media relations by providing thorough, informative answers to all questions.

LIMITATIONS

There are three major risks associated with news conferences. One risk is that a news conference can focus a high degree of attention on the situation, potentially causing unnecessary local concern. Consider using news releases, or other, lower-profile means of disseminating information if such distortion is likely. Second, the presiding official may say something that is inaccurate or that should not be quoted to the media. Another risk is that the official's comments could be taken out of context by the media and create false impressions among the public. This risk is heightened when the conference is not properly structured according to rules of order or protocol and unanticipated questions result.

12. NEWS RELEASES (continued)

TECHNIQUES **Be brief.** Limit the news release to essential facts and
(continued) issues.

Use simple language and avoid the use of professional jargon and overly technical words.

Identify the issuer of the news release. The top of the sheet should include the following:

- Name and addresses of the issuing agency;
- Release time (For Immediate Release or Please Observe Embargo Until), and date;
- Name and phone number of a staff person to reach for further information; and
- A headline summarizing the action taken.

BENEFITS A news release, if used by the local media, can quickly and inexpensively reach a large audience. News releases can inform citizens of activities at the site, and give them an opportunity to raise questions about the findings or the alternative remedies.

LIMITATIONS Because news releases usually can contain only the most important information, minor details that the public may be more interested in are often excluded. Thus, a news release alone cannot address all citizen concerns; it must be issued in conjunction with other methods of communication where more attention to detail is permitted. When announcing controversial results, it may be useful to attach a fact sheet that contains more detailed information.

13. SITE TOURS (continued)

Ensure that the tour complies with the safety plan for the site.

BENEFITS

The media, local officials, and citizens become familiar with the site, the difficulties of solving the problem, as well as the individuals involved in cleanup operations. The result could be better understanding and more accurate reporting.

LIMITATIONS

An arranged tour may lead people to believe that the problem is larger than it really is, particularly if technical aspects of the removal or remedial action are not explained clearly, in terms understandable to a lay audience.

Another limitation is that the public may attempt to engage EPA or state community relations staff in a heated, unproductive debate in the presence of media representatives.

- 14-- PUBLIC CONSULTATIONS/SMALL GROUP MEETINGS (continued)

TECHNIQUE Gear the discussion to the audience. Avoid discussing the
(continued) release problems in highly technical terms unless citizens
are knowledgeable about the topic.

Listen. Find out what the citizens want done. Some concerns may be met by making minor changes in the selected remedy. Other citizens' objections to the planned work would require revisions that change the cost and scope of work of the permanent remedy. Work out a possible compromise or explain the reasons why citizen proposed remedies appear to be unworkable or contradict program or statutory requirements.

Follow-up on any major/citizen concerns, stay in touch with the groups, and contact any new groups that have formed.

BENEFITS The primary benefit of public consultations is that they allow two-way interaction between citizens and EPA and the state. Not only will the citizens be informed about the proposed response, but the citizens will have the opportunity to ask questions and to express their thoughts on the issue.

Another attractive feature of public consultations is that they add a personal dimension to what could otherwise be treated as a purely technical problem. Familiarity with the considerations involved in selecting the remedy can relieve citizen apprehension about the hazardous substance problem.

LIMITATIONS To be effective, attendance should be restricted to about 5 to 10 individuals. In situations where more than 10 citizens would like to be included, additional consultations or a single large public meeting may be required. Public consultations, however, use EPA or state staff resources intensively, requiring upwards of a half-day of staff time to reach a limited number of citizens.

Another limitation is that some citizens or environmental groups may perceive restricting the number of attendees as a ploy to "water down" the influence large groups may have on potential actions.

15. PUBLIC INQUIRY RESPONSE

- ACTIVITY** Answering questions for the public and providing information when requested.
- PURPOSE** To keep the public informed of EPA and state activities throughout the response program.
- TECHNIQUE** Staff should consider establishing a toll-free "Superfund hotline" or should publicize local telephone numbers that citizens can use to obtain information.
- Requests for information should be handled promptly. Telephone calls and personal visits leave little time to prepare a response; however, answer questions as thoroughly as possible without making the caller wait. If you are on a tight schedule, set up a more convenient time to answer the inquiry.
- Make sure the caller's needs are understood, and state exactly what information will be sent in response to the inquiry. Take the opportunity to inform the caller about other sources of information.
- Written inquiries allow more time to formulate clear, detailed answers, but it is important not to delay the response more than a few days.
- BENEFITS** Responding to public inquiries should serve two important purposes: to keep the public informed of response actions, and to demonstrate the desire to provide timely responses to citizen concerns.
- LIMITATIONS** It is difficult to judge whether or not citizen's questions have been adequately answered, or whether responses have been misinterpreted.

16. PUBLIC MEETING (continued)

Present the issues concerning the site, preliminary findings, and proposed course of action. Allocate some time for citizens to express their concerns and ask questions. **Establish a time limit** for each citizen; this avoids lengthy presentations which could generate impatience and disrupt the meeting. Meetings may last from an hour to no more than three hours.

BENEFITS

Public meetings provide the public with an opportunity to express their concerns to EPA, state, or local government officials. Meetings also provide an opportunity for EPA and the state to present information and a proposed course of action. Public meetings also provide one setting for the resolution of differences between the government and the community.

LIMITATIONS

Public meetings may not be the best way to obtain citizen input. If controversy surrounding the site has escalated, a public meeting could provide an opportunity to intensify conflicts rather than resolve them. Evaluate the possibility of a public meeting getting out of hand by reviewing the site's history and level of citizen involvement in this and similar controversies. In addition, if citizens in the area view public meetings as distractions from the issues or if public meetings have been failures in the past, then use an alternative method, such as small public consultations, to transmit information and obtain feedback. Or, schedule a public hearing that is highly structured.

17. WORKSHOPS (continued)

BENEFITS Workshops provide more information to the public than is possible through fact sheets. They also allow for two-way communication between the public and the persons who are running the workshops, thereby answering many of the citizens' concerns and questions. For this reason, workshops are particularly good for reaching opinion leaders, interest group leaders, and the most affected public.

LIMITATIONS Workshops reach only a small segment of the population unless a number of them take place.

18. LOCAL REPOSITORY/PROJECT FILE (continued)

TECHNIQUE Make sure the file is kept up-to-date. Timely replacement of dated information helps avoid unnecessary misunderstandings.

BENEFITS An information repository provides local officials, citizens, and the media with easy access to accurate, detailed, and current background data about the site. It demonstrates that officials are responsive to citizens' needs for comprehensive site information.

LIMITATIONS A project file requires diligent maintenance to avoid misunderstandings based on dated information. Also, there is always a risk that information contained in the file may be used out of context.

CHAPTER 5

ADMINISTERING A COMMUNITY RELATIONS PROGRAM

Chapters 2 through 4 describe techniques community relations staff can use to develop an effective community relations program for removal and remedial actions. This chapter provides guidelines on program administrative requirements for planning, reporting, and personnel. It first examines the development, contents, and format for a community relations plan (CRP) -- the key program planning, management, and budget tool. It then describes the requirement to submit program status reports to EPA Headquarters. Finally, it explains the division of responsibility for community relations between Headquarters and EPA Regional Offices, and discusses how to use contractor support appropriately. The guidelines on developing CRPs apply either to EPA staff or state agencies taking the lead on Superfund community relations activities.

A. PROGRAM PLANNING

This section describes EPA requirements for the development of CRPs. Staff responsible for developing community relations programs should consult Appendix A to review suggested formats for community relations planning documents.

1. Development of a Community Relations Plan •

The CRP is the planning, management, and budget document that guides the community relations program at Superfund sites. CRPs must be developed for all Superfund planned removal and remedial actions. In addition, a profile of community concerns and a short version plan must be developed for certain kinds of immediate removal actions. Specific planning requirements for each type of Superfund action are described below.

1.1 Immediate Removals

Chapter 2 describes a two-step planning process for immediate removal community relations programs:

- A community relations profile must be prepared for immediate removal actions that last longer than 5 days. It must contain a brief analysis of the nature of citizen concern, the key site issues, and program objectives. The profile should explain how community relations staff intend to plan for and implement community relations activities at the site. It must be submitted with the Immediate Removal Request (the "10 Point Document").

The complete CRP for the site must be prepared either 1) within four weeks of the submission of the draft Action Memorandum or prior to the initiation of the remedial investigation, whichever comes first for federal-lead sites; or 2) with the final cooperative agreement package for state-lead sites. The complete CRP includes:

- The information presented in the draft CRP, updated if necessary.
- A list of communications activities to be conducted at the site, an explanation of how these activities will be conducted, and a description of how these activities relate to the technical response schedule.
- A budget, schedule, and workplan.
- A list of technical and community relations staff responsible for site work.

The plan should clearly identify the roles and responsibilities of all federal agencies that may be involved in the response action (e.g., the Federal Emergency Management Agency or the Army Corps of Engineers). There should be a provision for coordinating the activities of different federal, as well as state and local, agencies. The division of responsibility among various federal agencies for community relations during Superfund response actions is outlined in interagency agreements or memoranda of understanding.

The complete plan must specify that the community will have an opportunity to comment on the feasibility study prior to the selection of site remedy, and must describe how community relations staff will implement the required comment periods for nonexpedited and expedited remedial actions. (See the comment period discussion on pp. 3-8 and 3-9 of this handbook.) The plan must be sufficiently flexible to permit an extension of the review period where an extension is warranted. At sites where there is significant public interest, the plan should also provide for monthly fact sheets or progress reports on technical and community relations work. In all cases, the plan should provide that the community must receive advance notification of any action at the site.

EPA or state staff should revise the plan any time a major change takes place in the community's needs for information or in the technical schedule. The CRP, however, must be revised when the feasibility study is completed to incorporate communications activities planned for the design and construction phases of the action. The budget, schedule, and workplan should be revised at this point as necessary. The revised CRP should be submitted two weeks after the submission of the draft Record of Decision for federal-lead sites or with the draft amended cooperative agreement application for state-lead sites.

3. Appropriate Tasks for Contractors

The community relations programs at individual sites will include many activities for which it is appropriate to make use of contractor staff. Some activities will be routine; others will involve behind-the-scenes preparation; still others may require special expertise. Contractors are especially useful for ensuring that technical information is accurate and comprehensible.

Exhibit 5-1 illustrates the appropriate responsibilities of contractor staff for a number of standard community relations activities. The amount of contractor assistance asked for, and the division of responsibility between EPA and contractor staff, will vary from site to site. The preparation and distribution of any written materials, as well as all appearances before the news media, must conform to EPA policy on such matters.

Technical contracting firms and their employees may be inexperienced in assisting with community relations activities. The following section discusses the capabilities that contractor staff assigned to community relations should possess, and suggests how to evaluate contractors' performance in this area.

4. Evaluating Contractors

a. Staff Qualifications

The most important contractor qualification is a clear understanding of the specific communications and technical problems at a site. Without such an understanding, it is difficult to speak straightforwardly and informatively to interested citizens and officials, as a good community relations program requires. Because the community relations program is a two-way communications program, one-way public relations skills are not sufficient. Instead, the following qualifications should be looked for in the contractor staff assigned to community relations activities:

- **Strong interpersonal skills:** the ability to listen well, to speak clearly, to know how to answer a question in a way that will not frustrate or anger someone very concerned about a sensitive issue.
- **The demonstrated ability to write clearly** and to distill detailed information into a form suitable for a news release or a fact sheet.
- **The willingness and ability to learn the technical complexities** of a site's geohydrology, the engineering measures conducted in response, and the potential effects of the substances at the site on human health.

EXHIBIT 5-1

SAMPLE TASKS FOR CONTRACTORS IN A COMMUNITY RELATIONS PROGRAM*

<u>Activity</u>	<u>Contractor Responsibilities</u>	<u>EPA or State Responsibilities</u>
Community information interviews	Conduct interviews, analyze socio-political environment, prepare report on site history and actors, brief EPA	Clear up any questions by interviewees, attend briefing
Community relations plan	Develop and draft plan	Review and approve plan
Telephone contacts	Make follow-up calls, set interview dates, develop community mailing list	Make initial calls to all elected, appointed, and citizen leaders
News releases	Research text of releases	Draft, edit, and release
Public consultations	Arrange small meeting with citizens and EPA staff, prepare agenda	Meet with citizens and answer questions
Fact sheets	Research fact sheet; reproduce and distribute sheets	Draft, edit and approve fact sheet
Briefings and news conferences	Arrange time and location; brief EPA staff on how to answer difficult questions, etc; arrange any written handouts	Invite officials or reporters, practice answers with contractor staff, edit and approve handouts, prepare opening statement, answer all questions (contractors do not participate)
Workshops on hazardous waste	Design and conduct workshops in interested communities; arrange all logistics and support	Make available technical staff to discuss testing techniques, alternative solutions, etc. for workshop
Formal public meeting or public hearing	Arrange time and location, prepare public notice, advise and prepare EPA speakers, prepare agenda and any support materials (including audio-visuals)	Conduct hearing. Discuss site problems and progress, roles of EPA, state, other agencies, etc.; answer questions
Public inquiry responses	Prepare routine responses for EPA approval, aid in researching more involved responses	Read all letters, divide into routine and involved answers, write involved answers; handle all phone inquiries; approve all responses
Graphics	Prepare graphics for presentations or briefings	Review and approve all graphics

*The EPA Regional Office or the state response agency directs all contractor work. The support activities listed on this exhibit are performed at the discretion of the staff with responsibility for the community relations program.

CHAPTER 6
COMMUNITY RELATIONS AND ENFORCEMENT ACTIONS

(Reserved)

APPENDIX A

COMMUNITY RELATIONS PLANNING DOCUMENTS

INTRODUCTION

To encourage the design and implementation of effective community relations programs at Superfund sites, community relations planning begins early in the response action and is generally completed before site work is initiated. This appendix describes how to prepare the community relations documents that are an integral part of the Superfund program: the community relations profile (immediate removals); and the community relations plan (immediate removals, planned removals, and remedial actions).

Chapters 2 and 3 of the handbook generally discuss these documents and suggest activities that might be included in community relations plans (CRPs). Chapter 5 explains EPA planning requirements in greater detail. The sample formats and plans that are presented below should further help EPA and state community relations staff to determine the scope and contents of these planning documents.

A. THE COMMUNITY RELATIONS PROFILE

The community relations profile -- a short form CRP -- must be prepared for any immediate removal action that lasts longer than 5 days. It must be submitted with the Immediate Removal Request (the "10 Point Document") and can later be incorporated into any immediate removal CRP. To ensure that the profile briefly explains how EPA intends to plan for and implement community relations activities at the site, community relations staff should use the profile format presented in Exhibit A-1. In preparing the profile, staff should answer the relevant questions listed in Exhibit A-2.

B. THE COMMUNITY RELATIONS PLAN

Community relations plans must be prepared for all Superfund-financed immediate removals lasting longer than 45 days and for all planned removal and remedial actions.

As described in Chapter 5, CRP requirements differ slightly, depending upon the nature of the response action. For example, as soon as it is evident that a removal action may last longer than 45 days, an immediate removal CRP must be prepared for the site. This CRP is less detailed than the CRP prepared for planned removal and remedial actions and is not necessarily based upon on-site discussions.

While the structure and contents of CRPs for planned removals and remedial actions are similar, the development process differs. A CRP covering the entire planned removal action must be submitted along with the "14 Point Contractual Document." For remedial actions, draft CRPs must be submitted

engineering or science teachers would be very different from a presentation to a taxpayers organization. The local groups (to be identified in the community information interviews and/or telephone contacts) may include:

- Neighbors of the site;
- Local elected officials, political candidates, county or municipal boards, county health departments;
- Federal or state representatives and their staffs;
- Groups organized around the issues of the site;
- Existing civic groups: League of Women Voters, Kiwanis Club service clubs, church groups, taxpayer groups, farm organizations, senior citizen groups, minority groups;
- Local business groups,, Chamber of Commerce, real estate groups;
- Environmental groups, Audubon Society, Sierra Club;
- Health organizations, local American Cancer Society chapter;
- Officials or interest groups from nearby communities;
- Local industries and business;
- Labor unions; and
- Newspaper, radio, and television reporters, editors, talk show hosts.

Once the interested groups in a community and their concerns about the site are identified through on-site discussions and/or telephone contacts, the plan can be drafted.

The CRP includes the following elements that detail the community relations program at the site:

- Background and history of community involvement at the site:
 - Site history
 - Community involvement
 - Key issues;

- Provide accurate, timely information about the response to the community; and
- Allow citizens to express their concerns to EPA and the state.

The purpose of this section of the CRP is to list specific objectives tailored to the technical response timing and the level of citizen concern at the site. Included in these objectives are the specific points that EPA and the state want to communicate to the community at certain points in the technical response, and the specific decisions on which local input is essential.

The community relations techniques section lists the communications activities to be conducted in each phase of the response and specific objectives. The section should explain how the community relations activities selected for the site are tied to the technical response workplan and schedule. The types of techniques that can be used in Superfund community relations programs are described in Chapter 4, but other techniques may be used as well, particularly activities that fit into ongoing local arrangements. As noted in Chapter 5, the CRP must specify that the community will have an opportunity to comment on the feasibility study prior to the selection of a site remedy. This section of the CRP must specify how a three week comment period will be implemented for nonexpedited remedial actions. For any initial remedial measures (IRMs), the plan must also (1) address how the community will receive prior notification of any site action and (2) state that a minimum two week comment period will be provided for any complex IRM recommended by a limited feasibility study. It should note that if there is a reasonable request for a comment period extension (e.g., because of delays in providing documents to citizens), community relations staff should extend the review period, as long as the delay does not exacerbate any threat to public health, welfare, or the environment.

This section should also detail how staff will keep citizens informed of past site activities and upcoming events on a regular basis. Where there is significant public interest, CRPs should provide for monthly fact sheets or progress reports on technical and community relations work. There should be provision for coordinating the community relations responsibilities of the federal, state, and local agencies, in addition to EPA, involved in the response.

The last two sections, the workplan and schedule, and the budget and staffing plan, consist of charts. The workplan and schedule display technical milestones and community relations activities along a time line. The time line may be altered over the course of the Superfund response because most activities will correspond to technical milestones, not dates. The community relations activities should include a period for lead time to draft, circulate, review, and approve written materials and activity plans before the date of the activity. The budget and staffing plan details the EPA, other federal, and state agency staff responsible for each community relations activity. The staffing list should differentiate preparatory staff -- those

EXHIBIT A-1

SUGGESTED FORMAT -- COMMUNITY RELATIONS PROFILE
FOR IMMEDIATE REMOVALS

DATE PROFILE PREPARED:

A. BACKGROUND

1. Release information

Date and location of release and substances released:

Nature of the threat to public health, welfare, and the environment:

Response actions, if any, taken to date:

Brief description of any actions taken by community members, or any meetings that have already been held by EPA or the state, elected officials, or citizens:

B. OBJECTIVES OF THE COMMUNITY RELATIONS PROGRAM

List of specific objectives for the site and why these are selected:

Brief description of activities considered for the site (staff's preliminary view of what would constitute an effective program for the site) and how these activities would be tied into the technical response:

EXHIBIT A-3

SUGGESTED FORMAT -- COMMUNITY RELATIONS PLANS
FOR IMMEDIATE REMOVALS

DATE PLAN PREPARED:

A. BACKGROUND OF RELEASE

1. Date of release and substances released
2. Nature of the threat to public health, welfare, and the environment
3. Response actions, if any, taken to date

B. KEY COMMUNITY CONCERNS AND ISSUES

1. Concerns and issues identified by local officials and citizens
2. Identification of interested local officials, citizens, and groups, their affiliation, addresses, and phone numbers
3. Brief description of any media coverage; media coverage date; identification of media contacts:
4. Description of actions taken by the community

C. OBJECTIVES FOR THE COMMUNITY RELATIONS PROGRAM

1. List of specific program objectives (e.g., to provide accurate, understandable information, to prepare the community for further action, to allay community concerns)
2. Explanation of why objectives have been selected (e.g., their targets, their relationship to the response action)

D. COMMUNITY RELATIONS ACTIVITIES

1. List of communication activities to be performed at the site; description of how they relate to program objectives; explanation of how community relations activities relate to the technical response schedule
2. Brief schedule of activities (specify date, activity, objective, staff, workhours)

E. STAFF

1. List of staff responsible for program implementation and their assignments

COMMUNITY RELATIONS PLANSAMPLE CRPSkiljan Residence/Dial Services Manufacturing Company
Cleveland, Ohio

This community relations plan outlines activities to be conducted during a Superfund planned removal action at the Skiljan residence and the Dial Services Manufacturing Company, both being located in Cleveland, Ohio. Subject to finalization of the cooperative agreement between Ohio EPA and U.S. EPA, the Ohio Department of Health will have the lead responsibility working in close cooperation with U.S. EPA, Region V and Ohio EPA. This community relations plan can be updated and revised in response to events affecting the progress of the planned removal and/or citizens needs or concerns.

A. BACKGROUND AND KEY ISSUES1. Site History

- a. Skiljan residence
18028 Nottingham Road
Cleveland, Ohio

On April 30, 1982, Mr. Eugene Skiljan discovered, in the course of demolishing a barbeque pit in his backyard, several hundred vials labeled "U.S. Radium" and "poison". Investigation by the Ohio Department of Health (ODH) Radiological Health Program, led to identification of the vials as spent containers possibly from Dial Services Manufacturing, a radium dial painting company founded by the former owner of Mr. Skiljan's residence, Mr. Walter Issel. Subsequent surveying identified several regions of radioactivity in the backyard and on an adjoining property, seepage off the property showing elevated radium-226 in the water and contamination in the basement of the home.

During the week of May 25-28, the Center for Applied Isotope Studies (CAIS) at the University of Georgia surveyed the property more fully for the State of Ohio and identified, in addition to the barbeque pit, nine areas requiring excavation to remove radium-226 contaminated soils.

- b. Dial Services Manufacturing Company
1741 Rockwell Avenue
Cleveland, Ohio

Subsequent to the discovery of radium contamination on the Skiljan property, an investigation was conducted by the ODH, Radiological Health Program, of the building in downtown Cleveland, Ohio, where Dial Services Manufacturing formerly painted radium dials. The firm still exists but no longer utilizes radioactive materials. Less than a dozen employees are engaged to teflon coat small parts. The radioactive survey established that gamma and beta radiation levels

B. OBJECTIVES OF THE COMMUNITY RELATIONS PLAN

The objectives of the community relations program are:

1. To keep Dial Services Manufacturing, the Skiljans and immediate property owners apprised of the plan and time table for clean up.
2. To insure that city officials especially interested in the sites be informed of plans, progress and any problems which may develop.
3. To keep interested state and Congressional legislators and state officials informed of plans and progress.
4. To insure that accurate information is disseminated to the media.

C. COMMUNITY RELATIONS TECHNIQUES

The following techniques are suggested to meet the objectives of this community relations plan:

<u>Objective</u>	<u>Technique</u>
1. Meetings with Dial Services Mfg., the Skiljans and immediate property owners.	To keep them informed of plans and progress. These can be one to one meetings rather than group meetings. As clean up starts, these will likely be on a day to day basis.
2. Meetings with city officials.	To inform interested city officials of the plans and progress. These should include meetings as preliminary plans are made, when the schedule is set, as any problems develop and when work is completed.
3. Briefings for state and Congressional legislators and state officials.	To keep these interested individuals informed of progress. These briefings can be oral or written.
4. Media conference.	To provide all concerned media with accurate information, an opportunity to tour the sites and question the contractor, state officials and city officials.

SAMPLE CRP

Site tours

Paul Massa (ODH)
Bob Quillin (ODH)3
3

Media releases

Ken Meckstroth (ODH)

10

Concluding report

Lorey Roggenkamp (OEPA)

10

F. OFFICIALS, CITIZENS, MEDIALocal OfficialsFederal OfficialsState OfficialsConcerned Citizens and Property OwnersMedia

COMMUNITY RELATIONS PLAN
FOR REMEDIAL ACTION
AT THE IMPERIAL SITES
IMPERIAL, MISSOURI
(June 1983)

This Stage I community relations plan outlines the activities to be conducted during a Superfund remedial action at the Imperial sites in Jefferson County, Missouri. U.S. EPA Region VII has the lead responsibility for managing the remedial action, which consists of initial remedial measures, a remedial investigation, and a feasibility study. This plan was prepared in February 1983 and revised in June 1983.

I. BACKGROUND AND HISTORY

A. SITE HISTORY

Imperial, Missouri, a suburb of St. Louis, is an unincorporated town of about 6,000 middle-income families. The dioxin sites located in Imperial are nestled in a hilly, wooded area that is still being developed.

In February 1971, a salvage oil company owned by a Mr. Russell Bliss began hauling dioxin wastes from the now defunct Northeastern Pharmaceutical and Chemical Company (NEPACCO) in Verona, Missouri. The type of dioxin, scientifically named 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD), is an unwanted byproduct resulting from the manufacture of trichlorophenol, which was produced by NEPACCO as an intermediate in the manufacture of hexachlorophene.

The dioxin-contaminated wastes were mixed with waste oils and used to spray at least three horse arenas for weed and dust control. One of these arenas was at Bubbling Springs Ranch in Jefferson County. It was sprayed with contaminated oil in June and July 1971. Early in 1972, two horses died, and later in the year four more died. At the time, the cause of death was undetermined. As a precaution, however, 850 yards of arena soil was excavated in March 1973.

The excavated soil from Bubbling Springs Ranch was used as residential fill at the Minker residence and the Stout site (named after the contractor who did the excavation and who owned the property at the time). Approximately 20 truckloads of the soil were used to fill a steep ravine on the south end of the Minker house. The property is located on a ridge at the head of the watershed, and the fill area has mostly washed out into Romaine Creek. The Stout property is on the side of a ridge, and the contaminated soil was used to level off an area underneath two house trailers.

October 6 and 7, 1982: EPA staff toured the area and visited four households near the Minker site (staff could not contact two other households near the site) and one household near the Stout site.

October 6, 1982: A phone line to EPA was opened; from October to the present, approximately 30 residents have called EPA.

October 14, 1982: A public meeting was held at Mermac Heights Elementary School. Approximately 150 households in the vicinity of the sites were invited. About 175 persons attended. There was heavy press coverage and attendance by local and state officials. A fact sheet was distributed.

November 5, 1982: Dioxin Update No. 1 (stating the status of October sampling) was sent to approximately 150 households in the vicinity.

December 7, 1982: EPA and CDC made personal visits to the six households identified for relocation. Dioxin Update #2 was distributed door-to-door to approximately 150 families. This included October sampling results, maps of the sites that were sampled, action options, future plans, and notice of a public inquiry center.

December 8, 1982: A public inquiry center was opened at a nearby hotel for 5 days, 9 a.m. to 9 p.m. A press conference and news release presented the findings from the October sampling.

January 20, 1983: A spokesman for concerned citizens near the Minker site requested a meeting between residents and responsible officials. Forty-two citizens attended, as well as representatives from EPA, CDC, Missouri Division of Health, Missouri Department of Natural Resources, and a State of Missouri attorney. There was no press attendance. Remedial actions and citizen concerns were discussed. Handouts included a fact sheet, dioxin questions and answers, and a summary sheet of proposed actions.

January 29, 1983: A public hearing was held at Jefferson College in Hillsboro, called by Congressman Robert Gephardt. This was a general meeting concerning possible dioxin sites throughout Missouri. Meeting participants included: Regional and Headquarters EPA officials; FEMA; CDC; Missouri DNR and Health Division; State Senator Harriet Woods; State Representative Bob Feigenbaum; Dr. Ellen Silbergeld (Environmental Defense Fund); and representatives from the Minker site, Stout

- f. James Haeger household--two adults. Next door neighbors to Minkers on W. Rock Creek Road.
- g. Joseph Korenak household--first house south of Minker residence, on west side of Rock Creek Road.
- h. Albert Edwards household--located immediately adjacent to Romaine Creek, approximately 1/3 mile north of the Minker site.
4. Personal contact will be maintained with ^{eight} ~~five~~ households adjacent to the seven identified for relocation:
 - Crismon
 - Davis
 - Abramson
 - Henderson
 - Webb
5. Three households near the Stout site have been offered relocation:
 - Martin Hutchison (next door to site; have already temporarily relocated)
 - James Cisco (2 doors down from site; have already temporarily relocated)
 - Edward Baczynski (across street; have already temporarily relocated)
6. Personal contact will be maintained with two households near the Stout site that have expressed concerns:
 - Jack Sutton (owns trailer house on Stout site; is the developer--NHI Development Company--of Country Club Manor subdivision)
 - Peter Vogt (owns part of Stout site; lives further up the road)
7. Other areawide groups that are involved in the dioxin situation in Missouri are:
 - Coalition for the Environment (based in St. Louis; present at January 29 meeting)
 - Missourians against Hazardous Waste (based in Excello, Missouri)
 - Environmental Defense Group (based in Washington, D.C.; Dr. Ellen Silbergeld attended January 29 meeting)

taminated soil be contained onsite or removed? What will the restoration and close-out procedures be? There is a strong feeling by some people that containing and securing the site is not an adequate cleanup measure; if this solution is chosen, they will insist on being bought out on the basis of lowered property values and future health risks. If soil is removed, will the truck traffic cause road deterioration? What traffic controls will be provided? How will equipment used during the cleanup be decontaminated? How will residents be protected from dust? Can downwind residents be relocated during on-site action?

It should be emphasized that people's two main concerns are health effects and economic loss. It is perhaps relevant to note that in August 1982, a Federal court awarded over \$58 million in damages to workers whose health was affected by exposure to dioxin during the cleanup of a 1979 train derailment in Sturgeon, Missouri. Several residents in the Imperial area have filed suit for damages, and more litigation is expected.

Based on the issues, concerns, and citizen participation and perceptions that have been identified, the level of community concern at the Imperial sites should be assessed as high.

E. PROPOSED REMEDIAL ACTIONS AND SCHEDULE

The activities described below will be conducted pursuant to a written contract between EPA and the State of Missouri. That contract defines the responsibilities of EPA and the State and provides for funding of the proposed actions. EPA is the lead agency and will be responsible for performing all activities at the site other than the relocation of the residents.

- Initial Remedial Measures - Temporary relocation will be offered to affected residents by the State of Missouri. EPA contractors will post warning signs around the Minker and Stout residential areas and along Romaine Creek. Before the posting, access agreements will be obtained from property owners and surveys of the area will be conducted.
- Remedial Investigations - Additional data will be collected. Aerial photographs of the area will be taken to prepare topographic maps. Additional soil samples from the Stout residential area will be collected and analyzed to accurately define the contaminated area. A hydrogeological study of

III. TECHNIQUES TO BE USED TO MEET OBJECTIVES

The following community relations techniques fulfill the objectives listed above. The purpose of each technique and its application at certain stages of the technical work are discussed. The workplan and schedule shown in Section IV shows these community relations techniques in relation to technical milestones.

Technique	Objectives
1. Personal contact with residents	Door-to-door or by telephone. To inform target residents (relocatees; spokespersons for two community groups; closest neighbors) of major findings, activities, and decisions. Should occur before fact sheets or other public information is released.
2. Briefing of local and state officials	In person or by telephone. Inform appropriate officials of plans and developments on continuing basis. CIGL will maintain liaison with public officials.
3. Public consultations	Informal discussions with small groups of concerned citizens (two identified groups and any others that arise) to review issues and answer questions. Provide medical experts or other experts as appropriate. Schedule during the feasibility study to present the alternatives and solicit input; also schedule upon request.

<u>Technique</u>	<u>Objectives</u>
8. EPA toll-free telephone line (Office of Public Affairs, EPA Region VII, Kansas City)	(Office To provide a direct line of communication for inquiries and concerns. Number should be included in fact sheets or otherwise be made known to local residents and officials.
9. Onsite inquiry office (optional)	To provide an onsite source of information when controversial findings are released or when a great deal of public interest is anticipated.
10. Regional information office (optional, for St. Louis region)	To provide information about this and other dioxin sites; to provide personal, easily accessible, and consistent contact, to <u>concerned citizens</u> .
11. Summary of public concerns	For use by EPA staff during feasibility study; public concerns are to be used as one criterion for the evaluation of alternatives.
12. Interim report	To provide EPA Headquarters with a summary of public inquiries and concerns, the responses provided, and the community relations activities conducted.

V. BUDGET AND STAFFING PLAN

(To be provided by EPA)

APPENDIX: NOTIFICATION LIST (Available upon request)

- A. Local officials
- B. Interested or affected parties and organizations
- C. Media

APPENDIX B

COMMUNITY RELATIONS GUIDANCE FOR EVALUATING CITIZEN CONCERNS AT SUPERFUND SITES

2. PLANNING AND PREPARATION

This section of the guidance discusses the planning and preparation that should precede discussions with citizens and local officials at the site. The work effort required for the activities described will vary from site to site, depending on the level of citizen concern and the site's technical complexity. On the average, however, planning and preparation for on-site discussions should require three days of work effort.

Prior to conducting the on-site discussions, the community relations staff should plan: (1) how to acquire information about the site and identify interested public officials and members of the local community; (2) how to contact interested officials, citizens, and organized groups; and (3) how to elicit information from these individuals and groups. These three phases of the planning process are discussed separately below.

A. Acquiring Site Information and Identifying Interested Officials, Community Members, and Groups

To ensure that key individuals are contacted and that site issues are understood, certain steps should be performed to acquire necessary background information, including the following:

- (1) Meeting with regional EPA and state technical staff to discuss known or suspected site problems, to identify interested officials and citizens, and to obtain other background information;
- (2) Reviewing EPA regional office, headquarters and state files to obtain relevant memos, documents, and correspondence;
- (3) Researching local newspaper articles for the names of community leaders and for a preliminary indication of major site issues;
- (4) If EPA clearance has been obtained, contacting Congressional offices in Washington or the state, either by telephone or in person, to obtain additional background information, as well as to inform the offices that EPA or state staff or contractors will soon visit the site. Congressional staff can identify the most involved citizens and the major site issues on the basis of inquiries to their office. It is essential to obtain EPA clearance, however, before making such contact. (Staff in the local or district Congressional office nearest to the site may be included routinely among those with whom on-site discussions are held, as noted below.)

those persons on the contact list, staff should explain that the purpose of the discussions is solely to obtain the views of community members on site problems and to explore the concerns and issues identified by citizens and local officials. Staff should stress that the discussions will not be used to provide information to the public about site problems or possible future site actions, but instead, that the purpose of the discussions is to assess the level and nature of community concerns, so that community relations activities appropriate to those concerns can be conducted and so that community concerns can be taken into account in planning response actions. The purpose of the discussions will usually be easily understood. Citizens and officials will generally not object to speaking to government staff who cannot provide them with findings on possible effects or a firm schedule for cleanup, although they may be disappointed not to receive such information. Rather, citizens and local officials are generally appreciative that someone from the government is willing to meet with them and listen to their views. They regard the discussions as an opportunity to voice their concerns and, perhaps, to have some effect on government decisions.

If possible, all meetings should be scheduled over a period of no more than five days.

C. Eliciting Information from Individuals and Groups

The final phase of the planning process is to draw up a brief and informal list of questions to guide the discussions with local officials and citizens. Such a list may help to ensure that the discussions are efficient yet comprehensive. These questions may serve as a reminder of the areas that should be covered in the discussions, the kinds of information that should be elicited, and any specific points that must be addressed. Because the on-site discussions should not be conducted as a survey, the questions listed in advance while planning the discussions need not be asked explicitly during discussions. Exhibit 1 presents examples of questions that may be useful in conducting on-site discussions.

In addition to preparing questions, community relations staff should determine whether there are any special matters that should not be publicly disclosed (for example, specific findings from enforcement investigations or preliminary cost estimates for cleanup). Program and enforcement staff should be consulted on this point before the on-site discussions are held.

3. CONDUCTING ON-SITE DISCUSSIONS

This section presents procedures that may be useful to EPA, the state, or contractor support staff in conducting on-site discussions with citizens and local officials. If possible, all discussions related to a specific site should be conducted within a five day period:

Once the discussions have begun, staff should try to:

- Make all appointments as scheduled;
- Arrange a follow-up conversation if additional time is needed with any official or citizen;
- Assure citizens and officials that all interviews will be held confidential, and that no specific statements will be attributed to any person without prior clearance;
- Have two community relations staffers present during the discussion, when possible, so that one can take notes while the other leads the discussion.

About 45 minutes to one hour should be allowed for a discussion with an individual. Less time will usually be required once the community relations staff have become familiar with the background of community involvement through previous discussions. If asked, staff should not hesitate to identify some of the other citizens or officials with whom discussions are being held.

Local reporters may, on occasion, ask to attend discussions between community relations staff and community leaders or officials. The attendance of reporters at these discussions should be discouraged, as it might inhibit a frank and open conversation. Reporters should be asked, instead, to meet separately with community relations staff. If they do attend discussions with officials, they should be included in the meeting and asked for their views and comments, which are valuable.

At the outset of any discussion with reporters, community relations staff should repeat that the purpose of the discussion is to collect information, not to answer questions, and that the community relations staff are not in a position, in any event, to provide new information on site problems or response plans.

Community relations staff must take special care to avoid making subjective comments about the site during the discussions and avoid conveying specific information that may raise citizens' or officials' expectations about response activities.

4. EVALUATING DISCUSSIONS

Based upon the discussion summaries and the notes from each meeting, community relations staff should evaluate the nature and level of citizen concern at the site. This evaluation will be incorporated into the CRP.

Community relations staff may assess whether community concern is high, medium, or low by considering the presence or absence of the following six characteristics, which have been found to be important indicators of community involvement and concern in past on-site investigations conducted by EPA:

- (1) Children's health -- whether families in the community believe their children's health may be affected by hazardous substances;
- (2) Economic loss -- whether local homeowners or businesses believe that the site has caused or will cause them economic loss;
- (3) Agency credibility -- whether the performance and statements of EPA and the state are viewed by the public as competent and credible;
- (4) Involvement -- whether an active, vocal group leader (or leaders) has emerged from the community and whether the group leader has a substantial local following;
- (5) Media -- whether events at the site have received substantial coverage by local, state, regional, or national media; and
- (6) Number affected -- whether more than three or four households perceive themselves as affected by the site.

Some of these characteristics are more important than others in determining the level of community concern. For example, a perceived threat to children's health is a particularly strong indicator of a potentially high level of citizen concern at a site. If several of the above characteristics describe the affected community, the community relations staff have grounds for considering that the level of community concern at the site may be medium to high or has the potential to become medium to high.

In writing CRPs, following completion of these on-site discussions, it is important to maintain objectivity. Consideration should be given to the feelings of any citizens or officials mentioned. These plans will be circulated among the state and federal agencies involved in the response. They may also be read by members of the general public in the site community. Allegations or opinions expressed by those with whom discussions

APPENDIX C
THE QUARTERLY REPORT

7. Does the CRP currently address these issues? Do you plan to revise the CRP? _____

8. Explain any deviations from the CRP for the site during the past quarter? _____

9. Would you like OPPM community relations staff or contractors to assist you in meeting certain needs during the next quarter or in resolving particular issues? _____

SITE REPORT PREPARED BY: _____

DATE: _____

APPENDIX D

Superfund Coordinators Superfund Community Relations Coordinators (September 1983)

Region One

John Hackler, Superfund Coordinator
Waste Management Division
EPA - Region I
John F. Kennedy Federal Building
Boston, Massachusetts 02203
FTS 8-223-5709 or (617) 223-5709

David Pickman, Superfund
Community Relations Coordinator
Office of Public Affairs
EPA - Region I
John F. Kennedy Federal Building
Boston, Massachusetts 02203
FTS 8-223-5752 or (617) 223-5752

Region Two

Robert Ogg, Superfund Coordinator
Air and Waste Management Division
EPA - Region II
26 Federal Plaza
New York, New York 10278
FTS 8-264-2647 or (212) 264-2647

Lillian Johnson, Superfund
Community Relations Coordinator
Office of Public Affairs
EPA - Region II
26 Federal Plaza
New York, New York 10278
FTS 8-264-4534 or (212) 264-4534

Region Three

Ed Skernolis, Superfund Coordinator
Air and Waste Management Division
EPA - Region III
Curtis Building
6th and Walnut Streets
Philadelphia, Pennsylvania 19106
FTS 8-597-9100 or (215) 597-9100

Region Six

William Hathaway, Superfund Coordinator
Deputy, Air and Waste Management Division
EPA - Region VI
First International Building
1201 Elm Street
Dallas, Texas 75270
FTS 8-729-9709 or (214) 767-9709

Betty Williamson, Superfund
Community Relations Coordinator
Congressional and Intergovernmental Liaison
EPA - Region VI
First International Building
1201 Elm Street
Dallas, Texas 75270
FTS 8-729-9986 or (214) 767-9986

Region Seven

David Wagoner, Director/Superfund Coordinator
Air and Waste Management Division
EPA - Region VII
324 East 11th Street
Kansas City, Missouri 64106
FTS 8-758-6529 or (816) 374-6529

Rowena Michaels, Director
Office of Public Affairs
EPA - Region VII
324 East 11th Street
Kansas City, Missouri 64106
FTS 8-758-5894 or (816) 374-5894

Steve Wurtz, Superfund
Community Relations Coordinator
Office of Public Affairs
EPA - Region VII
324 East 11th Street
Kansas City, Missouri 64106
FTS 8-758-5894 or (816) 374-5894

Region Eight

John Wardell, Superfund Coordinator
Air and Waste Management Division
EPA - Region VIII
1860 Lincoln Street
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Headquarters Superfund Community Relations Staff
(September 1983)

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Allen Maples
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Office of Emergency and Remedial Response
EPA Headquarters (WH-548D)
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Washington, D.C. 20460
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Michael Flaherty, Removal Actions Contact
Emergency Response Division (WH-548B)
Office of Emergency and Remedial Response
EPA Headquarters
401 M Street, S.W.
Washington, D.C. 20460
FTS 8-382-2196 or (202) 382-2196

Tony Diecidue, Remedial Actions Contact
Hazardous Site Control Division (WH-548E)
Office of Emergency and Remedial Response
EPA Headquarters
401 M Street, S.W.
Washington, D.C. 20460
FTS 8-382-2454 or (202) 382-2454

APPENDIX E
PROBLEM SITUATIONS
(reserved)

APPENDIX F

GLOSSARY OF TERMS AND ACRONYMS

This glossary presents brief descriptions of terms used in the community relations handbook. The terms are organized alphabetically by broad categories: community relations program; Superfund response actions; program documents and requirements; and program offices and officials. The acronyms that are applicable to program terms are listed at the end of the glossary. Detailed definitions of these terms are provided in this handbook.

COMMUNITY RELATIONS PROGRAM

Community Relations Program. The community relations program is a two-way communications program, designed to provide communities with accurate, understandable information about Superfund sites and proposed response actions, to elicit community concerns, and to provide communities with an opportunity to comment on proposed response actions.

Public Relations Program. A public relations program is an information program that exists primarily to provide information to the public about an agency and its programs. It differs from a community relations program in that it does not necessarily promote two-way communication.

The Superfund Response Program. The Superfund program is the response program established by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) to respond to releases or threatened releases of hazardous substances, pollutants, or contaminants from vessels or facilities. (See CERCLA and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300.)

SUPERFUND RESPONSE ACTIONS

Response Actions. Superfund response actions are those removal or remedial actions undertaken in accordance with Section 104 of CERCLA. The three types of response actions that may be taken under CERCLA are described below.

Immediate Removals (IR): These are actions taken to prevent or mitigate immediate and significant risk of harm to human life or health or to the environment. They are subject to timing and monetary limitations. (See Section 300.65 of the NCP.)

Superfund planned removal and remedial actions. In addition, a less detailed plan must be developed for immediate removals that are anticipated to last longer than 45 days. The plan contains: an assessment of citizen concern; a list of communications activities to be conducted at the site, a budget estimate, schedule, and workplan, and a list of technical and community relations staff responsible for site work.

Community Relations Profile. The profile--a short form CRP--is a brief analysis of the nature of citizen concern, the key site issues, and program objectives that must be prepared for immediate removal actions lasting longer than 5 days.

Cooperative Agreement (CA). The cooperative agreement is the agreement that outlines the responsibilities of the federal and state governments for removal or remedial actions at state-lead Superfund sites. (See "Guidance-Cooperative Agreement and Contracts with States under CERCLA (P.L. 96-510)," U.S. EPA, OERR, March 1982.

Feasibility Study (FS). The feasibility study is conducted to develop and analyze remedial alternatives, to recommend the appropriate cost-effective remedial action, to prepare an environmental assessment, and to develop a conceptual design for the recommended action.

Fourteen Point Document. This planned removal document, prepared by On-Scene Coordinators for EPA-lead actions, describes general site information, explains the threat presented by the site, and provides information regarding the proposed response action. (See the EPA Contracts Management Manual for the required contents of the document.)

National Contingency Plan (NCP). The NCP is the regulatory document that guides response actions taken pursuant to CERCLA and Section 311 of the Clean Water Act. (See the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR 300.)

National Priorities List (NPL). The NPL is a list of over 400 hazardous waste sites targeted for cleanup by federal and state governments under CERCLA. Sites on the list are candidates for remedial or enforcement action. Decisions on the type and extent of action to be taken at the site are made on a case by case basis according to guidelines specified in the NCP.

Quarterly Report. This is a brief summary of community relations activities for each Superfund response in the Region. Prepared by the Regional Superfund community relations coordinator, the report is submitted to Headquarters where it is used to analyze community relations programs and to identify potential communications problems at sites.

The Office of Emergency and Remedial Response (OERR). This is the EPA office responsible for establishing Superfund policies, for implementing the Superfund Program, and for evaluating program effectiveness.

The Office of Policy and Program Management (OPPM). This is the office within OERR that is responsible for developing community relations policies, reviewing and approving community relations plans, tracking communications activities at sites, and conducting program evaluations and resource analysis.

The Regional Office of Public Affairs (OPA). Staff in the Regional Office of Public Affairs are responsible for helping to design and implement a community relations program at each site where Superfund monies have been obligated. The office works closely with the technical staff at the site and in the Regional Office in conducting community relations programs.

On-Scene Coordinator (OSC). This is the federal or state official that coordinates and directs the Superfund technical response at the site. The OSC works closely with the community relations staff to establish site-specific community relations programs.

ACKNOWLEDGEMENT

This handbook is a product of the combined efforts of ICF Incorporated, EPA's Office of Emergency and Remedial Response, and EPA Regional and State Superfund and public affairs staff concerned about citizen involvement in responding to hazardous substances problems.

Daphne Gemmill and Barry Jordan served as EPA's project officers. Their guidance and direction in developing the handbook benefitted from the contributions of Anthony Diecidue, Anne Fenn, L. Michael Flaherty, and Allen Maples from EPA Headquarters. The ICF staff for this project include James R. Janis, Project Manager, Carol Andress, Edwin Berk, Bradley Brockbank, Margo Brown, James Bunchuck, Carole Francis, Sara Nielsen, Robin Sandenburgh, Mary Sexton, Corliss Wallingford, Zella Williams, and Dana Wohlford. The initial guidance of Dr. Steven Cohen of Columbia University is also very much appreciated.