

# *REGION III*

## RCRA CORRECTIVE ACTION COMMUNITY RELATIONS GUIDE

FINAL

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## REGION III RCRA CORRECTIVE ACTION COMMUNITY RELATIONS GUIDE

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# **INTRODUCTION TO THE REGION III RCRA CORRECTIVE ACTION COMMUNITY RELATIONS GUIDE**

Public involvement and participation is an important part of the Resource Conservation and Recovery Act (RCRA) corrective action process. The U.S. Environmental Protection Agency (EPA) and the facility undertaking a corrective action are responsible for ensuring that opportunities for public involvement are provided during corrective action activities.

The blueprint for such community relations activities is the Community Relations Plan (CRP). The purpose of this Community Relations Guide is to provide guidance to facilities undertaking a corrective action on how to develop a CRP. This guide identifies the basic components of a CRP and recommends how these components should be implemented. Recognizing that each facility and the surrounding community is unique, this guide does not provide rigid standards. Rather, it focuses on the appropriate procedures to be followed when performing community relations activities, and the roles and responsibilities that both EPA and the facility have in every activity.

The guide is organized into three chapters:

- Chapter I: Region III RCRA Corrective Action Community Relations identifies and explains objectives of a community relations program and the basic resources needed.
- Chapter II: Requirements of a Basic Community Relations Program describes the basic community relations components for each facility undertaking work pursuant to a RCRA 3008(h) order.
- Chapter III: An Expanded Community Relations Program focuses on additional community relations activities that may be appropriate in communities where citizen interest or concern is high.

In addition, appendices are included that provide a public meeting checklist, guidelines on preparing written materials for the public, and samples of various documents.

For more information on Region III corrective action community relations, contact the RCRA Public Involvement Coordinator at:

US EPA, Region III  
Office of Public Affairs (3EA20)  
841 Chestnut Building  
Philadelphia, PA 19107  
(215) 597-9370

EPA guidance documents that provide additional useful information on public involvement and community relations programs are:

- Guidance for Public Involvement in RCRA Section 3008(h) Actions (OSWER Directive 9901.3, May 1987)
- Community Relations in Superfund: A Handbook (OSWER Directive 9230.0-3B, June 1988)

- Guidance on Public Involvement in the RCRA Permitting Program (OSWER Directive 9500.00-1A, January 1986).

These documents are available by calling the RCRA/CERCLA hotline at 1-800-424-9346 (in Washington, D.C., 382-3000).

\* \* \*

This guide was prepared for EPA Region III's RCRA/UST Enforcement Branch, Corrective Action RCRA Enforcement Section. The EPA Work Assignment Manager was Dana J. Barnett, with technical direction provided by Joseph Kotlinski and Peter Bentley (Office of Public Affairs). Review and input was also provided by Hal Yates of the Office of Public Affairs. Contractor support was provided by CDM Federal Programs Corporation and Booz, Allen and Hamilton Inc., a subcontractor, under EPA Contract 68-W9-0004.

## **CHAPTER I**

### **REGION III RCRA CORRECTIVE ACTION COMMUNITY RELATIONS**

Under a RCRA 3008(h) order, a facility is responsible for conducting a RCRA Facility Investigation (RFI) to determine the nature, rate, and extent of on and off site contamination, a corrective measures study (CMS) to investigate and evaluate various remedial alternatives, and corrective measures implementation. As part of the RFI Workplan, a facility must develop and implement a CRP to ensure that public involvement opportunities exist for people who live or work in, or are otherwise concerned with, the area surrounding a facility undertaking corrective actions.

The basic requirements for community relations during corrective action should be developed in a way that is most appropriate to the circumstances at each facility. In addition to these basic requirements, expanded Community Relations activities may be necessary in specific situations (See Chapter III for more information).

#### **OBJECTIVES**

The RCRA corrective action community relations program is a partnership between EPA and the facility performing corrective action. Together they formulate and implement community relations programs that are responsive to the needs of the community. Under RCRA 3008(h) corrective action orders, the objectives of the program are:

- To create communication channels that provide opportunities for public involvement
- To provide access to information
- To integrate community concerns, interests and comments into all activities and decisions, as appropriate
- To create early and continuing opportunities for public participation in RCRA corrective actions
- To ensure Agency understanding of and responsiveness to public concerns
- To anticipate conflicts and provide early means of resolution
- To give the public the opportunity to comment on and provide input to technical decisions
- To inform the public of planned and ongoing actions.

A CRP should be developed that is responsive to the individual facility's situation, the circumstances of the corrective action, and the community in the vicinity of the facility.

#### **ROLES AND RESPONSIBILITIES**

The major players in community relations planning are the EPA RCRA Project Manager for the facility, EPA's RCRA Public Involvement Coordinator, and a contact at the facility who will coordinate community relations activities with EPA.



The facility must develop all written materials, such as the CRP, fact sheet, and any handouts used at public meetings (described in Chapter 2) and submit these drafts to EPA for review. These documents become "final" upon EPA approval. The facility is then responsible for distributing the documents to the public.

When a public meeting is necessary, EPA will direct the facility to make all arrangements regarding the location and time of the public meeting. It is left to the discretion of EPA as to who will conduct the meetings, EPA or the facility.

Bimonthly progress reports are required pursuant to a RCRA 3008(h) order. These should contain information concerning the status of the investigation and also all public outreach efforts conducted by the facility during the reporting period. These bimonthly reports give EPA an overview of the facility's entire public outreach effort and will help coordinate overall communication efforts. The facility should inform EPA as soon as possible, of any problems that arise in the planning and conducting of community relations activities.

## **RESOURCE REQUIREMENTS**

To conduct an effective community relations program, a facility must plan ahead, prioritize its activities, and fund the program adequately. If a facility's responses are reactive only, resources will be spent "putting out fires", and the community's perception of the facility and the work being undertaken may be affected.

All required community relations activities can be conducted by available facility personnel. The kinds of staff needed are as follows:

1. Professional staff person experienced in writing documents in non-technical, concise language
2. Support staff member to coordinate with EPA
3. Contractors (optional) to conduct a portion or all of the community relations activities.

Cost for conducting community relation activities will vary depending on the facility's size, resources, and experience. The cost of completing the basic community relations activities usually range from \$5,000 to \$30,000. This includes both "manpower" or level of effort and "out-of-pocket " expenses.

## **LEVEL OF EFFORT**

The level of effort is the number of total hours it takes to complete all aspects of an activity, including technical and support staff. Overall, community relations activities require from approximately 250 to 350 hours. These hours are divided among public affairs, technical, and support staff. Further detail on hours can be found throughout Chapter II.

## **OUT-OF-POCKET EXPENSES**

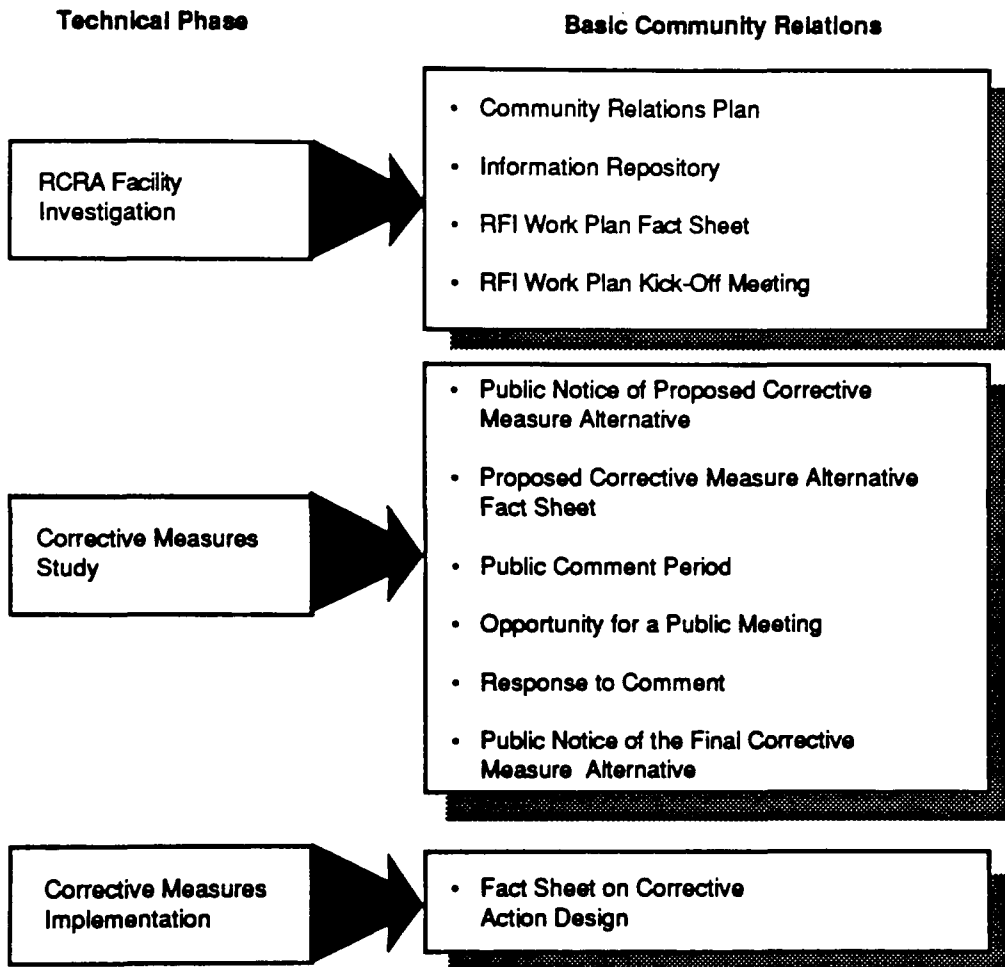
Cost incurred while conducting public outreach activities include out-of-pocket expenses such as mailing and advertising costs, court reporter fees, and meeting room charges. Each facility's actual costs will vary widely depending on the size of the community, proximity to a large metropolitan area, and the cost of living of the area. If costs become too high, EPA and the facility can work together on alternatives.

## CHAPTER II

### REQUIREMENTS OF A COMMUNITY RELATIONS PROGRAM

The eleven activities that make up the Region III Corrective Action Basic Community Relations Program correspond to steps in the corrective action process. They are conducted to aid community involvement throughout the process and are listed below in Exhibit 1.

EXHIBIT 1



### THE COMMUNITY RELATIONS PLAN

The facility writes and submits the CRP to EPA along with the draft RFI work plan. The CRP identifies the activities that the facility will conduct as part of the basic program, and any expanded activities planned. The CRP contains information on the background and regulatory history of the facility, as well as an assessment of the type and level of community interest in the facility. Finally, it includes the mailing list of interested parties and suggested locations for the information repository. The CRP is a public document and should be written in clear, non-technical language. Development of a CRP takes approximately 120 hours.



## **Contents of the CRP**

An outline of the recommended format for the CRP is included in Exhibit 2. The following is a general description of each of the outline topics.

### **Overview of the CRP**

The overview provides a general introduction to the document, briefly stating the purpose of the CRP, the information it contains, and the features of the public involvement effort planned for the community. It also includes a summary of the roles and responsibilities of EPA and the facility.

### **Facility Description**

The facility description identifies the facility's operations and the anticipated scope of the corrective action. This brief description summarizes any historical, geographical, or technical information necessary for the reader to understand why the facility is undergoing a cleanup. The facility description includes:

- Facility map(s) that show the facility's location and proximity to other landmarks, the layout of facility grounds, and the areas targeted for cleanup
- A history of facility use and ownership
- Date and type of known releases contributing to the contamination at the facility
- The threat or potential threat posed to public health or the environment potentially posed by the facility.

### **Description of Local Community**

The description of the local community focuses on the community's level of interest in the facility and in corrective action. In general, this portion of a CRP contains the following information:

- Type of community (e.g., geographic and demographic information such as urban, rural, industrial, or suburban; high, moderate, or low population density; sizeable foreign-speaking population)
- Type of local government
- Level and nature of community interest in the facility (e.g., history of community reaction to the facility and level of interest in facility operations; information on any citizen groups organized to deal with the facility)
- Number of residences that border facility grounds
- Source of area water supplies if groundwater contamination is an issue

- Number of persons employed by the facility and types of jobs held
- History of community outreach or public affairs activities conducted by the facility.

There are a variety of methods available to use in collecting this information. These include reviewing facility documents and records, researching newspaper articles, interviewing facility managers and public affairs staff with a historical knowledge of the facility, and contacting the local planning commission, zoning commission, and Chamber of Commerce.

A description of the steps taken to collect this information must be included when the facility sends the draft CRP to EPA. This description should cite the books, brochures, and records reviewed, as well as persons or organizations contacted.

### CRP Activities

The CRP activities section contains all community relations activities that are planned. In addition to all eleven basic activities that must be described, expanded activities must also be listed if they are planned. Initially, it may not always be clear if expanded activities will be necessary. If at any time expanded activities are planned, the CRP should be updated to include them.

### Schedule

The schedule gives a timeline of community relations activities that will occur during the investigation and corrective action process. All planned events should be included, with the projected month specified.

### Locations for the Information Repository

This section of the CRP lists potential locations in the community where the Information Repository may be housed and gives details about each location. Locations should meet the requirements listed below:

- Convenient location and hours of operation for the majority of citizens
- Access for physically impaired citizens
- Availability of photocopying facilities.

Locations that meet these requirements usually include a local library, the city or town hall, or any other municipal building that has the available space to hold several files of documents, and is open at least two weekday evenings or Saturdays. In general, commercial establishments are not considered appropriate.

In listing the possible locations for the information repository, the draft CRP should provide the following information for each location:

- Address and phone number
- Contact person
- Hours of operation
- Availability and cost of photocopying
- Access for the physically impaired.

## **EXHIBIT 2**

### **RECOMMENDED FORMAT FOR THE COMMUNITY RELATIONS PLAN**

- A. Overview of Community Relations Plan**
- B. Facility Description**
- C. Description of Facility Community**
- D. Community Relations Plan Activities**
- E. Schedule**
- F. Locations for Information Repository**
- G. Locations for Public Meetings**
- H. Mailing List/Media Directory**
  - 1. Federal Elected Officials**  
(name, address, phone)
  - 2. U.S. EPA Region III Officials**  
(name, address, phone)
  - 3. State Elected Officials**  
(name, address, phone)
  - 4. State and Local Agencies**  
(name, address, phone)
  - 5. Local Officials**  
(name, address, phone)
  - 6. Community Organizations, Environmental Groups, and Citizens' Groups**  
(name, address, phone)
  - 7. Media**
    - a. Newspapers**  
(name, address, phone, contact person, circulation, deadline for advertisements, rate per column inch)
    - b. Television**  
(name, address, phone, contact person, deadline for public service announcements)
    - c. Radio**  
(name, address, phone, contact person, deadline for public service announcements)
  - 8. Interested Individuals\***

\* EPA may choose to omit names and addresses of private citizens from the final community relations plan that is released to the public. These names, however, should be included on the mailing list that is compiled for the facility.

If possible, two or three potential locations should be included in the draft CRP. EPA is responsible for choosing the most suitable location(s) for the information repository and will contact the appropriate person to set up the repository. The final CRP should only list the location(s) of the information repository selected. Additional information concerning the information repository is found in the section entitled, RFI Work Plan Fact Sheet.

### Locations for Public Meetings

The CRP also contains suggested locations for public meetings. Meetings are generally not held on facility property. Like the information repository, public meetings should be held in convenient locations that are accessible to the physically impaired. Other information that should be included about the public meeting location is:

- Name and address of suggested location
- Contact person
- Seating capacity and type of seating
- Cost of rental for the meeting facility, if applicable
- Charges for security or janitorial services
- Advance notice required
- Availability of audio-visual equipment and rental charge, if applicable
- Availability of a public address system

Typical appropriate locations for public meetings include a library, school buildings, city or town hall, fraternal lodges, fire stations, and church halls. As with the information repository, EPA will review the information in the draft CRP and determine the public meeting locations that are suitable. The final CRP will contain the list of public meeting locations that EPA selected as the most appropriate.

### Mailing List and Media Directory

A mailing list of appropriate Federal, state, and local officials, interested groups and individuals who will receive information pertaining to the corrective action must be developed and included in the CRP. Also included is a directory of local newspapers and television and radio stations that can publish or air public service announcements concerning community relations activities. All mailings should also be sent to these media representatives. Exhibit 2 (which follows page II-3) provides a format for the mailing list and media directory.

To facilitate EPA review of the draft CRP, the facility should provide a brief list of the sources for all entries in the mailing list/media directory. The facility should also indicate other sources consulted, even if these sources did not result in an entry on the mailing list/media directory.

## **INFORMATION REPOSITORY**

The information repository is a public location that contains corrective action-related documents. The repository is established following EPA approval of the draft RFI work plan. EPA selects a location or locations from those suggested in the CRP. EPA then contacts the location and begins procedures for establishing the repository. EPA is responsible for sending documents to the repository and ensuring that it is maintained in an orderly fashion. Refer to Exhibit 4 (at the end of this chapter) for more information concerning the roles and responsibilities of EPA and the facility.

The specific chronology and responsibilities for publication of the information repository are as follows:

- The facility suggests locations for the information repository
- EPA selects an information repository location and informs the facility
- The facility drafts the public notice and submits it to EPA for review and comment
- The facility revises and resubmits until EPA determines that the text is suitable
- The facility confers with EPA regarding the newspaper in which the notice will be published and the day(s) it should run
- The facility coordinates with the newspaper to set up the day(s) of publication
- The facility receives "tear sheets" -- samples of the page(s) on which the ad ran, from the newspaper and sends a copy to EPA.

### **Preparing the Notice**

Since the repository's main purpose is to serve public information needs, the public must be informed of its location, purpose, and contents. To accomplish this, the facility publishes a public notice in a local newspaper. The notice contains information on the repository, including its location, hours of operation, the types of documents to be housed there, and the names and phone numbers of contact persons at the repository location, EPA, and the facility.

All statements that are published must be accurate and error-free.

This procedure applies each time preparation of a public notice is required.

### **Publishing the Notice**

Sunday is usually the best day to run a public notice, as readership is generally at its peak. At a minimum, the notice should run one day. If there is considerable community concern about the corrective action, the notice should run at least two days.

The notice should be placed in the news section of the newspaper, where it will attract the most attention. The facility should ask the newspaper to supply at least two "tear sheets". One copy is for facility files, the other is sent to EPA .

This procedure applies each time publication of a notice is required.

### **RFI WORK PLAN FACT SHEET**

Fact sheets are an excellent method of communicating information about specific complex issues to laypeople in the community. Fact Sheets can take 80-120 hours to complete and are generally four to six pages long. They are tailored to the needs and interests of the affected community.

The RFI Work Plan Fact Sheet informs citizens of the scope and purpose of the upcoming investigations and studies at the facility. The facility is required to prepare an RFI fact sheet and distribute it to the mailing list, making extra copies available at the information repository, and to EPA and interested parties, as requested. EPA directs when work on the fact sheet begins, but work usually starts after both the RFI work plan and the draft CRP are submitted to and approved by EPA. The RFI work plan generally contains all of the information that needs to be included in the fact sheet.

For more information concerning the roles and responsibilities of EPA and the facility see Exhibit 4.

## **Contents of the Fact Sheet**

The recommended format for the RFI fact sheet is as outlined below:

### **Introduction**

The introduction briefly states the purpose of the fact sheet and the types of information it contains. The introduction also contains a brief explanation of the RCRA corrective action process (i.e., RFI, CMS, and implementation). This section should be one paragraph and should include a sentence stating that the fact sheet was written by the facility and approved by EPA.

### **Facility Background**

The background section contains a description of the facility, its operations, and its regulatory history. This one or two-paragraph section includes the following:

- Facility location
- Facility ownership
- Length of time the facility has been operating
- Types of operations
- Date when the 3008(h) order was issued.

### **Facility Description**

The facility description section gives detailed information on the specific area scheduled for investigation. Types of information include:

- Numbers and types of regulated units and solid waste management units (SWMUs), if applicable
- Kinds of wastes generated or otherwise handled
- Types of known releases contributing to the contamination at the facility.

This section can range from one paragraph to one page in length.

### **Facility Map**

At least one facility map should be included in every fact sheet. The map should locate the regulated units and SWMUs, if applicable, at the facility. It should depict all aspects of the regulated units and SWMUs that will be involved in the

investigation, such as lagoons, swamps, or ponds. The map should include as many details about the facility as possible, while still being clear and legible.

### Scope of RCRA Facility Investigation/Corrective Measures Study

This section contains a general explanation of what the RFI/CMS process is and how it fits into the general RCRA corrective action process. It includes definitions of terms and describes the field activities that generally are conducted during the RFI/CMS process.

### Purpose of RFI/CMS

This section contains the facility-specific details of the RFI/CMS. It describes the purpose of the RFI/CMS as it pertains to the given facility and discusses the specific information that will be obtained from the field work. The facility should take extra care in preparing this section to ensure that information is presented in clear, simple language that can be readily understood by the public.

### Projected Schedule

The projected schedule of activities includes field work startup and completion dates. This information can be presented in paragraph form, or it can be graphically depicted using a timeline.

### EPA/Facility Roles

This section describes the relationship between EPA and the facility. The facility should make it clear that it conducts and finances remedial and community relations activities, while EPA provides guidance and oversight throughout the process.

### For More Information

A fact sheet is one-way communication from EPA and the facility to the public, so sources must be provided for further information. This section should include the names and addresses of EPA and facility contacts, as well as the location of the information repository.

### RFI Kick-Off Meeting

The fact sheet should contain the date and time for the work plan kick-off meeting, if EPA has scheduled one. This information should be highlighted in some way, such as placing it in a box or printing it in boldface type.

### **RFI KICK-OFF MEETING**

EPA and the facility organize the public meeting to explain the reasons for and objectives of the RFI and CMS and associated schedule(s). At the meeting, community members raise questions, express concerns, and provide EPA with information that the Agency factors into its technical or procedural decisions about the facility.

As a general guideline, EPA has the major role in determining what information is communicated to the community and where the meetings are held. Usually EPA acts as the moderator of the meeting and the facility makes a presentation. The facility plays a major support role in making the logistical arrangements, presenting



information at the meeting, and documenting the meeting proceedings. Exhibit 3, following this page, summarizes these roles and responsibilities.

### **Meeting Objectives**

The RFI kick-off meeting is particularly important because it is conducted early in the process, providing the first substantive opportunity for the community to learn about the actions at the facility and provide input. One main objective of the meeting is to inform citizens of the facility history and status, EPA and facility roles and responsibilities, and opportunities for public involvement. The other main objective is for the Agency and the facility to gauge the degree and type of concern that area residents bring to the public forum.

The EPA RCRA Project Manager sets the agenda and usually runs the meeting. A typical meeting lasts approximately two hours. The agenda should include:

- Introduction and welcome
- Purpose
- Background and facility status
- EPA and facility roles and responsibilities
- RFI/CMS description
- Opportunities for public involvement
- Question and answer period
- Conclusion.

Typically these items are addressed by EPA staff, specifically the RCRA Project Manager or the Public Involvement Coordinator. The RFI description, however, is generally presented by the facility or its contractors. During the question and answer period, the EPA RCRA Project Manager may also request that the facility respond to particular questions.

### **Public Meeting Components**

As soon as possible in the RFI/CMS process, EPA and the facility should anticipate holding a public meeting. Typically, approval of the RFI work plan triggers the planning activities for this meeting. It generally takes 32-80 hours to complete preparations for a public meeting. Preparations for the RFI kick-off meeting include a planning conference call, logistics, a dry run, and a meeting summary.

#### **Planning Conference Call**

The EPA RCRA Project Manager will coordinate a conference call to discuss details of the kick-off meeting with the facility staff members who will be involved.

#### **Logistics**

Following the planning conference call, a number of logistical plans must be made. They are as follows:

- Location/room arrangements/building access
- Potential contractual agreements
- Audio-visual arrangement
- Public notice
- Meeting set-up

## EXHIBIT 3

### OVERVIEW OF ROLES AND RESPONSIBILITIES FOR PUBLIC MEETINGS

BASIC PUBLIC MEETING ACTIVITIES	FACILITY ROLE	EPA ROLE
Planning Conference Call	<p>Coordinate with EPA RCRA project manager</p> <p>Set up call</p> <p>Prepare and submit to EPA notes detailing agreed upon roles and responsibilities for public meeting</p>	<p>Inform facility of parties to call</p> <p>Lead the conference call discussion</p> <p>Decide on agenda, key points, meeting date, presentation format</p> <p>Review and confirm assignments for follow-up meeting planning</p>
Logistics: Meeting Location/Room Arrangements/Building Access	<p>Check with EPA for meeting location</p> <p>Make necessary visits to meeting location and calls to EPA to confirm suitability of meeting site</p> <p>Secure confirmation to use meeting room and arrange for payment if necessary</p>	<p>Inform facility of preferred meeting location</p> <p>Authorize use of selected meeting room</p>
Logistics: Audio-Visual Arrangements	<p>Secure needed A-V equipment</p> <p>Check equipment, electrical support systems to ensure working conditions</p>	<p>Inform facility of preferred meeting location</p> <p>Identify EPA personnel with whom facility may arrange to borrow equipment</p>
Logistics: Potential Contractual Agreements	<p>Coordinate with meeting location personnel to fulfill any contractual agreements necessary for use of the room</p> <p>Arrange for payment</p>	<p>Ensure contractual agreements are properly executed</p>
Logistics: Public Notice	<p>Check with EPA to confirm newspaper(s) for notice</p> <p>Arrange for publication</p> <p>Prepare draft notice and submit to EPA</p> <p>Submit final notice to newspaper</p> <p>Send copies of notice to TV/radio news, public service departments and mailing list</p>	<p>Confirm appropriate newspaper</p> <p>Review and approve draft notices for publication</p>

# EXHIBIT 3 (Cont.)

## OVERVIEW OF ROLES AND RESPONSIBILITIES FOR PUBLIC MEETINGS

BASIC PUBLIC MEETING ACTIVITIES	FACILITY ROLE	EPA ROLE
Logistics: Preparation of Meeting Signs, Attendee List, Handouts, and other Support Materials	<p>Coordinate with EPA to determine content of any handout material</p> <p>Upon EPA approval, prepare handouts</p>	<p>Direct decisions regarding type and quantity of materials to be produced</p> <p>Review handout materials</p> <p>Ensure that materials are produced and presented at meeting</p>
Logistics: Prepare Audio-Visuals	<p>Prepare draft materials and submit to EPA for review; revise accordingly</p>	<p>Supply necessary information and resources such as maps</p> <p>Review draft A-V materials, provide comments, approve</p>
Logistics: Local Contacts	<p>Check with EPA to determine if facility is responsible for contacting local officials or interest groups</p> <p>Upon direction from EPA, prepare notices or fact sheets</p> <p>Upon approval from EPA, send notices or fact sheets, or inform officials or residents of meeting by telephone</p>	<p>Determine whether EPA or facility will contact local officials/interest groups</p> <p>Coordinate with facility to make or approve contacts</p>
Meeting Summary	<p>Attend the meeting; take notes of proceedings</p> <p>Prepare and submit draft meeting summary to EPA</p> <p>Revise draft based on EPA input</p>	<p>Prepare Agency notes of meeting proceedings</p> <p>Review and comment on draft summary submitted by facility</p> <p>Approve final summary prior to placing in information repository</p>
Meeting Dry Run	<p>Prepare materials to be used in dry run</p> <p>Attend and comment on dry run</p> <p>Assist EPA in revision of meeting visuals and other materials, pending changes required by dry run</p>	<p>Coordinate with facility to prepare dry run materials</p> <p>Prepare and give meeting presentation</p>

- Meeting sign, sign-in list, agenda, other handout materials
- Local contacts

The facility's communication support staff should handle the logistical arrangements for the meeting in close consultation with the EPA RCRA Project Manager and/or EPA Public Involvement Coordinator.

#### Public Meeting Dry Run

To allow time for any necessary reproduction of audio-visuals and to gather additional information that may prove necessary, the dry run should be held at least one (1) week prior to the meeting.

#### Meeting Summary

The facility will attend the meeting, take notes, and prepare a draft summary of the meeting proceedings, including a paraphrased summary of questions raised and responses made during the question and answer period. The facility will submit the summary to EPA two weeks after the meeting and will subsequently revise the summary based on EPA's review and comment. Upon EPA's approval of the summary, the facility will place it in the information repository.

### **PUBLIC NOTICE OF PROPOSED CORRECTIVE ACTION MEASURE**

After the CMS is complete and EPA makes a preliminary selection of the preferred corrective action measure, there is a 30-day public comment period. To encourage public input prior to the public comment period it is the facility's responsibility to publish, in a newspaper of general circulation, a public notice that briefly describes the proposed corrective measure and announces the public comment period.

### **PROPOSED CORRECTIVE ACTION MEASURE FACT SHEET**

The proposed corrective action measure fact sheet is initiated when the EPA issues a Statement of Basis (SOB) to the facility.

The SOB includes the following:

- Facility background
- Facility description
- Facility map
- Cleanup levels
- Points of compliance
- Duration of cleanup
- EPA's rationale for choosing corrective measure

Upon receipt of the SOB, the facility is required to prepare a proposed corrective action measure fact sheet and distribute it to the mailing list, making extra copies available in the information repository and to EPA and interested parties, as requested. The purpose of the proposed corrective action fact sheet is to inform citizens of the results of the Corrective Measure Study, the alternatives studied to address contamination, and the corrective measure alternative proposed by EPA. The fact sheet also describes the opportunity for citizens to comment on the proposed corrective action.

The CMS report generally contains all of the information that needs to be included in the fact sheet. The responsibilities and chronology of events for producing a fact sheet are described in Exhibit 4.

## **Contents of the Fact Sheet**

Appendix B contains general criteria for writing to the public. Following is the recommended format for the proposed corrective action measure fact sheet. The sections that are indicated with an asterisk (\*) are described previously and will not be repeated here.

### **Introduction**

The introduction provides a general overview of the document by briefly stating the purpose of the fact sheet and the types of information it contains. The introduction should indicate that the fact sheet describes the alternatives analyzed to address the contamination, identifies the preliminary decision on a preferred measure and explains the rationale for the preference, highlights key information in the RFI/CMS report to which the reader is referred for further details, and solicits community input in selection of the final corrective action measure. The components that make up the treatment should be explained, as should any engineering or institutional controls necessary, such as monitoring wells. This section is generally three to four paragraphs in length and should include a sentence stating that the fact sheet was written by the facility and approved by EPA.

#### **\* The Statement of Basis**

### **Summary of Alternatives**

This section briefly highlights each of the alternatives evaluated in the detailed analysis of the CMS. Quantities of waste and implementation requirements related to each component should be noted, as well as the estimated construction and maintenance costs and the estimated implementation time of each alternative.

### **The Proposed Measure and Evaluation of Alternatives**

This section identifies the proposed alternative, emphasizing that the selection of this measure is preliminary and could change. The section then describes the criteria against which the alternatives are evaluated. Following this description, the section presents a summary of the performance of the preferred alternative against the criteria. This describes the basis for the preliminary selection. Finally, EPA's preliminary determination that the proposed alternative is the most appropriate choice is presented.

#### **\* EPA and Facility Roles and Responsibilities**

#### **\* For More Information**

### **Opportunity for Public Meeting**

The fact sheet should explain that citizens have the right to request a public meeting to discuss the proposed corrective action measure and the selection process. To request a meeting, citizens should call or write the EPA contact person.

## Public Comment Period

The final section of the fact sheet provides a brief explanation of what a public comment period is, the dates of the public comment period for the proposed corrective action, and that comments should be made directly to EPA.

### **PUBLIC COMMENT PERIOD**

A 30 day public comment period allows citizens to review and comment on the Agency's proposed course of action. This public comment period is held after EPA makes a preliminary selection of its preferred corrective action so that citizen input can be taken into account before a final remedy is selected. EPA receives oral and written comments from citizens on the proposed measure, and addresses and compiles them in the responsiveness summary. Additionally, the public is given the opportunity to request a meeting with EPA to discuss the corrective action measure.

The facility does not conduct the public comment period. It does, however, play a role in related activities, such as organizing the public meeting at which comments are received and arranging for a court reporter to transcribe the meeting. These activities are discussed in more detail below under "Opportunity for Public Meeting on the Proposed Corrective Action Measure."

### **RESPONSE TO COMMENTS**

The Response to Comments (RC) is a summary of the written or oral comments given at public meetings, public hearings, or during the public comment period, and EPA's responses to them. The purpose of the RC is to document any public concerns regarding the corrective action and how the Agency responded. The RC becomes part of the administrative record, the official file that includes all documents to which EPA referred in selecting the corrective action measure. The administrative record can be found in the information repository.

The facility's role in developing the RC is to deliver the official transcript of the public meeting, if one is held, to EPA as soon as possible following the public meeting. EPA uses the transcript to write the RC.

### **OPPORTUNITY FOR A PUBLIC MEETING ON THE PROPOSED CORRECTIVE ACTION MEASURE**

If the public requests a meeting to discuss the corrective action measure and the EPA RCRA Project Manager concludes that interest warrants a public meeting, the facility will be notified. The facility's support responsibilities are described in Exhibit 4.

### **Meeting Objectives**

The major objective of the meeting is to give the public the opportunity to discuss the corrective action measure with EPA. An equally important objective is for the Agency to further describe and explain about the technologies that were evaluated to address contamination associated with the facility, present the proposed corrective measure, and explain the rationale for this choice.

The agenda usually should include:

- Introduction and welcome
- Purpose
- Background and facility status
- EPA and facility roles and responsibilities
- CMS approach and findings
- Next steps
- Question and answer period
- Conclusion.

EPA staff, specifically the Project Manager and/or the Public Involvement Coordinator, usually cover these items, except for the CMS description which may be given by the facility or its contractors.

### **Public Meeting Components**

Preparations for the CMS meeting include a planning conference call, logistics, a meeting dry run, and a court reporter/meeting transcript. The facility has major responsibilities for each of these items. The first three requirements are identical to those described for the RFI kick-off meeting, pages II-8 to II-9, and should be followed. See Exhibit 3 for details.

#### **Court Reporter/Meeting Transcript**

A certified court reporter should be hired to attend, record, and prepare an official transcript of the proceedings. Fees for these services vary, depending on the region, from \$50 to \$150 for an appearance fee plus \$2.50 to \$5.00 per page of the transcript. Facilities should contact at least three services for estimates and references. NOTE: Only typographical errors can be changed on official transcripts.

The facility's confirmation letter should include the correct spellings of names of persons making presentations. The facility also should send the reporter a copy of any fact sheets and meeting announcements. The facility should coordinate with the court reporter and the EPA RCRA Project Manager in advance of and upon arrival at the meeting to clarify directions on seating arrangements and on how the court reporter will handle any problem with hearing speakers.

### **PUBLIC NOTICE OF FINAL CORRECTIVE ACTION MEASURE**

The public notice of the final corrective action measure announces to the public the measure that will be implemented to address contamination at the RCRA facility. The facility has no role in this phase of the RCRA corrective action process.

### **CORRECTIVE ACTION DESIGN FACT SHEET**

The corrective action design fact sheet informs citizens of the activities that will take place at the facility during the corrective design phase. The facility is required to prepare a corrective action design fact sheet and distribute it to the mailing list, making extra copies available in the information repository and to EPA and interested parties, as requested. As directed by EPA, work on the fact sheet begins after the corrective measure design has been approved and before field work begins. Information to



include in the fact sheet generally can be found in the Statement of Basis. The responsibilities and chronology of events for producing a fact sheet are described in Exhibit 4.

### **Contents of the Fact Sheet**

The recommended format for the corrective action design fact sheet is as follows:

- Introduction\*
- Facility Background \*
- Facility Description\*
- Facility Map\*
- Corrective Action Design Summary
- Projected Schedule
- EPA and Facility Roles and Responsibilities\*
- For More Information.\*

Information on each section that is indicated with an asterisk (\*) has been provided previously and will not be repeated here. Because each facility and situation is unique, these guidelines should be adapted as necessary. Appendix B contains general criteria for writing to the public.

#### **Corrective Action Design Summary**

This section discusses the objectives and purposes of the corrective action design. It includes information on the selected corrective action such as its basic components and how it will work to remediate contamination problems at the facility. Because this section contains definitions of treatment technologies that can be highly technical and complicated, the facility must ensure that this information is conveyed in clear, simple language that can be readily understood by the public. Diagrams or illustrations of technologies often can assist a readers' understanding of the treatment process, and should be included whenever possible. This section generally is two paragraphs to one page in length.

#### **Projected Schedule**

The fact sheet must contain a projected schedule of design activities, including field work startup and completion dates. This information can be in paragraph form or can be graphically depicted using a timeline.

## EXHIBIT 4

### OVERVIEW OF COMMUNITY RELATIONS ROLES AND RESPONSIBILITIES

BASIC COMMUNITY RELATIONS ACTIVITIES	FACILITY ROLE	EPA ROLE
Community Relations Plan	Draft CRP and supporting information  Submit with RFI work plan  Incorporate EPA comments	Review and comment on draft CRP and supporting information  Determine when final
Information Repository (IR)	Research possible locations  Draft notice of IR location(s)  Research information for public notice  Publish notice in local newspaper	Select IR location(s)  Review and comment on draft notice  Determine when final  Select newspaper in which notice will appear
RFI Work Plan Fact Sheet	Draft fact sheet  Incorporate EPA comments  Distribute to mailing list	Review and comment on draft fact sheet  Determine when final
RFI Work Plan Kick Off Meeting	Research public meeting locations  Make logistical arrangements  Prepare meeting summary	Select location and date  Provide information on equipment needs, agenda items, etc.  Invite speakers  Hold the meeting  Review and comment on meeting summary  Determine when final
Public Notice of Proposed Corrective Action Measure	Draft public notice  Publish notice in local newspaper	Review and comment on draft notice  Determine when final  Select newspaper in which notice will appear

**EXHIBIT 4 (Cont.)**  
**OVERVIEW OF COMMUNITY RELATIONS ROLES AND RESPONSIBILITIES**

<b>BASIC COMMUNITY RELATIONS ACTIVITIES</b>	<b>FACILITY ROLE</b>	<b>EPA ROLE</b>
Proposed Corrective Action Measure Fact Sheet	Draft fact sheet	Review and comment on draft fact sheet
	Incorporate EPA comments	Determine when final
	Distribute to mailing lists	
Public Comment Period	None	Determine dates for 30-day comment period
		Receive and review comments
Responsiveness Summary (RS)	Submit public meeting transcript to EPA	Draft RS
		Finalize RS
Opportunity for a Public Meeting	Make logistical arrangements	Determine if meeting will be held
	Hire court reporter	Determine meeting date and location
	Publicize meeting, if necessary	Provide information on equipment needs, agenda items, etc.
		Invite speakers
		Hold the meeting
Public Notice of Corrective Action Measure	None	Write public notice
		Publish notice in local newspaper
Fact Sheet on Corrective Action Design	Draft fact sheet	Review and comment on draft fact sheet
	Incorporate EPA comments	Determine when final
	Distribute to mailing list	
Bimonthly Progress Reports	Submit progress reports every two weeks	Review reports

## **CHAPTER III EXPANDED COMMUNITY RELATIONS**

Expanded community relations activities are public outreach efforts that extend beyond the eleven basic activities described in Chapter II. At some facilities there may be factors regarding the nature of the corrective action or the community that make basic community relations insufficient to meet the objectives of community relations described in Chapter I. In these instances, expanded community relations is appropriate.

In most circumstances, the facility and EPA jointly decide if expanded community relations is necessary. Either the facility presents expanded activities in the draft CRP, or EPA will recommend expanded activities in response to the profile of the community in the draft CRP and the nature of the corrective action activities. At some facilities it may not become apparent that expanded activities are necessary until after the CRP has been prepared. In these instances, the CRP should be updated to include the expanded community relations activities.

The typical circumstances that require an expanded program are:

- Historically high community interest in facility operations
- Large population living in close proximity to the facility
- Direct or potential community contact with the contamination (e.g., contaminated drinking wells)
- Organized local groups with a high level of interest.

There may be circumstances in which EPA will require a facility to conduct expanded community relations. One circumstance would be if the facility were either a proposed or final National Priorities List (NPL) site. A corrective action that receives substantial local or national interest is another instance in which EPA may require expanded community relations.

Expanded community relations may not include all of the public relations activities that a facility is conducting. Many facilities have extensive, long-standing public relations activities that would be neither appropriate nor possible for EPA to oversee. Public involvement activities that are deemed necessary and conducted solely by EPA are also not considered part of the expanded community relations program. Therefore, expanded community relations includes only those activities that EPA and the facility agree are necessary to serve the public interest. All activities that become part of an expanded program are then subject to EPA oversight.

Roles and responsibilities for each expanded community relations activity should be defined in the CRP, and be consistent with the general structure in which EPA conducts oversight and approval.

This chapter presents twelve expanded community relations activities that have been effective in meeting public involvement objectives:

- Community interviews
- Briefings
- Door-to-door canvassing
- News conferences
- Availability sessions
- Revised Community Relations Plan
- Facility tours
- Small group meetings
- Additional fact sheets on selected topics
- Telephone hotline
- Translations
- Workshops.

These techniques are by no means all-inclusive. They have been used frequently, but circumstances may dictate other approaches not mentioned here. More detailed information on how to conduct these activities can be found in the Guidance for Public Involvement in RCRA Section 3008(h) Actions and in Community Relations in Superfund: A Handbook, both referred to in the introduction to this guide.

EPA and the facility use the information gathered to write the CRP to assess whether the interests and concerns of the community warrant expanded community relations activities. For example, if there is concern about municipal water wells in the vicinity of a ground-water contamination plume, the facility may want to hold occasional briefings for local officials. A great deal of media interest would mean organizing media briefings or facility tours. To explain residential water well testing, facility representatives might go door-to-door, or hold small group meetings.

## **COMMUNITY INTERVIEWS**

Community interviews are informal, face-to-face interviews held with selected local residents, government officials, community groups, media representatives, facility owners and employees, and other individuals interested in facility activities. They are usually used to assist a facility during the development of the CRP. Community interviews are sources of first-hand information about the community near a RCRA 3008(h) facility. They enable a facility to gain an understanding of the community's perception of the facility's history, the community's involvement with the facility, and the political climate in the area; identify credible sources and disseminators of information; and learn how the community would like to be involved in the RCRA process. Interviews should be used only as means of obtaining, not disseminating, information.

## **BRIEFINGS**

Briefing sessions are held with key state and local officials and citizens to inform them of the status of specific facility activities. Facility staff conduct these sessions in person, and the briefings usually precede release of information to the media. Briefings are a good community relations method to inform key officials and citizens about recent developments at the facility; to provide them with background material on technical studies, results of the field investigations, and engineering design; and to report to them on corrective measure action planning and progress.

Briefings are appropriate when state or local officials or citizens have expressed a moderate to high level of concern about the facility. Briefings are generally held to announce specific findings such as test results. If ground-water contamination is an issue, for example, a briefing could be held to inform citizens of the results of residential well testing.

## **DOOR-TO-DOOR CANVASSING**

Canvassing is the process of gathering information by calling on individuals door-to-door. This activity permits the most direct, personal contact with the community, allowing facility staff to meet with community members individually and directly to discuss corrective action issues or gather needed information.

This activity is best used when information is needed from a specific group of individuals. For example, canvassing can be used to gather signatures to gain access to residential property for soil and water testing. Where the goal is to convey rather than collect information, such as announcing results of drinking water testing, a more appropriate approach may be to send a letter with the relevant information and the name of the facility contact person, and/or to conduct a briefing or public availability session.

## **NEWS CONFERENCES**

News conferences are information sessions or briefings held for representatives of the news media, but also open to the general public. They provide the media with accurate information concerning important developments at the facility, and also can provide an opportunity to announce plans for any future actions.

News conferences should be used primarily to announce findings at the facility which are of significant interest to the media and the community. A news conference announcing preliminary results of technical studies may unnecessarily escalate public apprehension.

## **AVAILABILITY SESSIONS**

Availability sessions are informal meetings in a public location where people can talk to facility and EPA contact persons on a one-to-one basis. These sessions allow citizens to ask questions and express their concerns directly to facility and EPA technical staff.

An availability session is most appropriate when key milestones have been reached or major decisions made. For example, release of sampling results or draft studies are appropriate times to hold availability sessions instead of conducting door-to-door canvassing.

## **REVISIONS OF COMMUNITY RELATIONS PLANS**

All or part of the CRP can be revised to incorporate new information, reflect changes in community concerns, or prepare for community activities during corrective measure design and corrective measure action. Revisions ensure that the CRP accurately reflects community interest and the activities being performed by the facility and EPA through final phases of the action.

CRPs should be revised before the corrective measure design begins, if the corrective measure design/action is not already addressed in the CRP. If, after the plan has been prepared, community concerns change focus or increase in intensity, the plan should be revised accordingly. Also, if EPA and the facility agree that community relations activities are needed that were not included originally in the CRP, it should be revised.

## **FACILITY TOURS**

Tours are scheduled trips to the facility for media representatives, local officials, and citizens, during which facility and EPA technical and community relations staff describe corrective action activities and answer questions. Tours can increase community understanding of the nature of the problems at a facility and the corrective action proposed or underway, as well as diminish fears and demonstrate good will.

Conditions permitting, tours can be conducted at any facility where citizens, the media, or local officials have expressed an interest. Facility tours may be particularly appropriate during or after the construction phase, so that citizens can see a corrective action in progress.

## **SMALL GROUP MEETINGS**

Meetings of small groups held in private homes or in local meeting places enable facility and EPA staff responsible for the corrective action to get first-hand information from interested citizens and local officials. Small group meetings are held to inform citizens and state and local officials of facility activities, answer questions, and clear up any misconceptions or misunderstandings. They can help develop sensitivity to citizen concerns and establish a rapport and good working relationship with residents.

Small group meetings can be used effectively during virtually all phases of a RCRA corrective action, particularly when test results are announced. These meetings can also provide a forum for explaining how unexpected events may affect the project schedule.

If issues are raised at the small group meeting that require follow-up, it is the facility's responsibility to respond within one week of the meeting. The facility reports on the meeting in the bimonthly reports submitted to EPA.

## **ADDITIONAL FACT SHEETS**

A fact sheet is a brief report that summarizes the current or proposed activities of the cleanup program. The fact sheet presents technical information in a clear and understandable format. This helps ensure that the public is informed of the status and findings of cleanup actions, and that citizens understand the issues associated with the corrective action process.

Fact sheets are appropriate whenever new information is available, and whenever a public comment period is required during the response action. In addition to corresponding with various stages of the RFI/CMS, fact sheets can be written to explain the facility inspection, corrective measure design, corrective measure action, and operation and maintenance.



## **TELEPHONE HOTLINE**

A toll-free telephone number in a facility office provides citizens with an opportunity to ask questions and obtain information promptly about facility activities. A telephone hotline is useful during the RFI or construction phase if concern is high about contaminant levels or similar issues. A hotline is particularly useful if any unexpected event, such as a fire or explosion, occurs at a facility. A hotline can also be effective during the construction phase, when citizens may have complaints regarding environmental impacts such as excessive dust or noise.

## **TRANSLATIONS**

Translations provide written or verbal information in a foreign language to a predominantly non-English speaking community to ensure that all community members are informed about corrective action activities and have the opportunity to participate in the decision-making process. There are three types of translations:

- A written translation of materials originally written in English
- A verbal translation of a public meeting or news conference by translating each sentence after it is spoken
- A simultaneous translation of a public meeting or news conference, usually with small headsets and a radio transmitter.

A translation is desirable where a large percentage of the community is non-English speaking. A written translation should be provided for fact sheets or letters. Verbal translations are recommended at meetings where there is considerable concern about the corrective action or suspicion of the facility's efforts to communicate with the community members.

## **WORKSHOPS**

Workshops are seminars or a series of meetings to discuss hazardous substance issues. They allow citizens to comment on proposed response actions and provide information on the technical issues associated with the corrective action and the RCRA program in general. Experts may be invited to explain the problems associated with releases of hazardous substances and possible remedies for these problems. Workshops serve to improve the public's understanding of the hazardous substance problem at the facility and to prevent or correct misconceptions. They also enable facility and EPA staff to identify citizen concerns and to receive citizen comments.

Workshops are appropriate for presenting technical information to citizens, such as the draft CMS. Workshops could also be useful to inform citizens of the RCRA corrective action process, and to increase their understanding of the potential risks associated with the contamination at the facility.

## PUBLIC MEETING CHECKLIST

A quick scan of this checklist can help prevent unwanted surprises.\*

MEETING LOCATION: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

- \_\_\_\_\_ Meeting Date & Time \_\_\_\_\_
- \_\_\_\_\_ Directions Distributed \_\_\_\_\_
- \_\_\_\_\_ Contact Person & Telephone \_\_\_\_\_
- \_\_\_\_\_ Facilitator \_\_\_\_\_
- \_\_\_\_\_ Number of People Expected \_\_\_\_\_
- \_\_\_\_\_ Panel Members Notified \_\_\_\_\_
- \_\_\_\_\_ Agenda Prepared \_\_\_\_\_
- \_\_\_\_\_ Oral Presentation Prepared \_\_\_\_\_
- \_\_\_\_\_ Keynote Speaker's Comments Prepared \_\_\_\_\_
- \_\_\_\_\_ Visual Presentation (slides/graphics/displays) Prepared \_\_\_\_\_
- \_\_\_\_\_ Dry Run Date and Location Scheduled \_\_\_\_\_
- \_\_\_\_\_ Ground Rules Established \_\_\_\_\_
- \_\_\_\_\_ Contingency Plan for Notice of Cancellation or Postponement Prepared \_\_\_\_\_
- \_\_\_\_\_ Court Reporter Scheduled \_\_\_\_\_

**ROOM ARRANGEMENTS**

- \_\_\_\_\_ Room Layout \_\_\_\_\_
- \_\_\_\_\_ Room Setup (tables/chairs/press) \_\_\_\_\_
- \_\_\_\_\_ Room Access (time open, close) \_\_\_\_\_
- \_\_\_\_\_ Setup Time \_\_\_\_\_
- \_\_\_\_\_ Security \_\_\_\_\_
- \_\_\_\_\_ Janitorial Services \_\_\_\_\_
- \_\_\_\_\_ Rest Rooms Open \_\_\_\_\_
- \_\_\_\_\_ Ventilation \_\_\_\_\_
- \_\_\_\_\_ Lecterns \_\_\_\_\_
- \_\_\_\_\_ Rental Fee \_\_\_\_\_
- \_\_\_\_\_ Access for Physically Impaired Persons \_\_\_\_\_
- \_\_\_\_\_ Public Address System \_\_\_\_\_

\* All of the items in the checklist may not be needed for every meeting. The facility should use this as a guide and coordinate with EPA for specifics.

### **ANNOUNCEMENT**

- ☐ Call Key Community Contacts
- ☐ Print Set of Mailing Labels
- ☐ Prepare and Distribute Fact Sheet
- ☐ Prepare Press Release
- ☐ Prepare and Distribute Press Release
  - Date: \_\_\_\_\_
- ☐ Send Materials to Information Repositories
- ☐ Place Public Notice in Newspapers
  - Date: \_\_\_\_\_
- ☐ Distribute Meeting Notice Fliers
  - Date: \_\_\_\_\_

### **AUDIO VISUAL EQUIPMENT**

- ☐ Slide Presentation/Projector (Extra Bulb)
- ☐ Overhead Transparencies/Projector (Extra Bulb)
- ☐ Video Tape Presentation/Tape Player & TV Set
- ☐ Film Presentation/Projector (Extra Bulb)
- ☐ Screen
- ☐ Microphones (Stationary & Remote)
- ☐ Cassette Recorder/Tapes/Batteries
- ☐ Press Hookup
- ☐ 35mm Camera/Flash/Film
- ☐ Video Camera/Tape
- ☐ Extension Cord(s)
- ☐ Pointer for Projection Screen
- ☐ Tables for Projector(s)
- ☐ Equipment Checked And Functioning

### **BASIC SUPPLIES**

- ☐ Name Plates/Name Tags
- ☐ Signs
- ☐ Copies of Agenda
- ☐ Copies of Fact Sheet
- ☐ Other Handouts
- ☐ 3"X5" Index Cards
- ☐ Pens
- ☐ Markers
- ☐ Easel/Flipchart
- ☐ Poster Paper
- ☐ Blank Paper
- ☐ Chalk
- ☐ Eraser
- ☐ Tape
- ☐ Scissors
- ☐ Response Cards
- ☐ Sign In Sheet

### **MEETING FOLLOW-UP**

- ☐ Return Equipment
- ☐ Prepare and Submit Draft Meeting Summary to EPA

## **APPENDIX B**

### **POINTERS FOR PREPARING PUBLIC INFORMATION MATERIALS**

What makes a public information document effective is its ability to convey information to the public clearly and concisely. Following are some suggestions that will assist in developing effective materials.

- Begin each writing project by developing a detailed outline of the purpose and content of the material to be covered. The audience for whom the material is intended also should be clearly defined.
- Every information program must operate on at least two levels -- the citizens who are already interested and involved, and those who are not. The information directed to the less involved or informed group might be considered preliminary to participation. These materials should be attractive and brief, and appeal to the needs and concerns of laypeople. Therefore, it is important to assess the interests of the readership prior to writing public information materials.
- In headlines and initial paragraphs, attract attention and interest with thought-provoking statements or questions. Link problems and issues with the reader's life and experience. Personalize messages; demonstrate how the agency's programs affect people's lives.
- Write clearly, simply, and directly, avoiding technical terminology, acronyms, and professional jargon. Explain technical terms the first time they are used in a publication. Write general purpose materials at the same reading level that the local newspaper is written.
- Use short declarative sentences with active verbs to make points. Avoid the use of long and complex sentences. Say it simply.
- Use conversational English. For example, use "do" for "accomplish."
- Consider using human scale comparisons rather than technical terms to communicate a point. For example, "the facility will generate noise approximately equal to that of a typical city street," or "the cost per family will be about \$100 per year."
- Each individual element in an information and education program should be easily linked to the overall program. The reader should easily see the relationship between a particular topic or product and the total project or process.
- Pre-test all public information products by asking several lay citizens to read and evaluate drafts for clarity, order, comprehensiveness, and detail. These people need not live in the community or be familiar with the facility. This final review can help ensure high quality publications that meet intended goals.
- Use graphics and illustrations to support the written content of a publication. Photographs, charts, and drawings can communicate ideas quickly and directly using few words. To emphasize the most critical information,

sparing use of a larger or different typeface, italics, underlining, bolding, or capitalization is effective. If these techniques are overused, however, their impact is lost.

- Always let the public know where and when full reports and technical information are available for public review.

APPENDIX C

Sample Response Card

- Reverse Side -

**Ace Manufacturing Company  
Response Card**

Date: \_\_\_\_\_

Name: \_\_\_\_\_

**Please include your  
name and address to:**

Address: \_\_\_\_\_

**— Be added to the mailing list.**

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

**— Receive a response to the  
following question/comment.**

Question/Comment: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

-----

Sample Response Card

- Front Side -

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Mr. Franklin Pratt  
RCRA Public Involvement Coordinator  
U.S. Environmental Protection Agency  
Region III  
841 Chestnut Street  
Philadelphia, PA 19107**

## Sample Notice of Public Meeting



**The United States Environmental Protection Agency (EPA)  
Will Hold a Public Meeting on the Proposed  
Corrective Action Measure at the  
ACE Company Facility in Cranston, Pennsylvania**

The U.S. EPA will hold a public meeting at 7 pm on the evening of Wednesday, November 28, 1990 to answer questions, provide information and receive comments on the actions that may be taken to address the environmental contamination problems at the ACE Company facility. The meeting will take place in the Cranston High School gymnasium at 115 Southbrook Lane, Cranston, Pennsylvania 19436.

The ACE Company facility is located at 2700 Falmouth Highway, approximately 2 miles southeast of the town of Cranston in upper Montgomery County, Pennsylvania. In October 1989, EPA cited the company for improperly disposing of untreated chemical by-products into a pond adjacent to the facility. Recently, a Corrective Measures Study (CMS) was completed that evaluated four measures for addressing the contamination problem. EPA is proposing that one of these measures, a modified conventional treatment, be used to treat the pond water. EPA is accepting public comment on this proposal through Thursday, December 13, 1990, after which a final decision will be made. At the public meeting, each of the measures will be described and public comments will be taken.

Copies of facility-related documents, including the CMS and the Statement of Basis which discuss all four of the measures considered, are available for review prior to the meeting at the information repository located in the City Clerk's office of the Cranston City Hall Building, 235 Loudon Avenue, Cranston, Pennsylvania 19436. For further information or to submit comments on the proposed corrective action measure, please contact: Franklin Pratt, Community Relations Coordinator; U.S. Environmental Protection Agency; 841 Chestnut Street; Philadelphia, PA 19107; (215)xxx-xxxx. The Ace Company contact is: Roberta Stiltwell, Public Relations Officer; Ace Company; 345 Filmont Street, Cranston, PA 19436; (717)xxx-xxxx.



## APPENDIX E

### Sample Information Repository Public Notice



**The United States Environmental Protection Agency (EPA)  
Announces the Opening of a  
Public Information Repository  
for Documents Related to the Corrective Action at the  
ACE Company Facility in Cranston, Pennsylvania**

The U.S. EPA and ACE Company have established a public information repository to provide information on the environmental contamination at the ACE facility and the actions that may be taken to address these problems. The repository is located in the City Clerk's office of the Cranston City Hall Building, 235 Loudon Avenue, Cranston, Pennsylvania 19436. Copies of facility related documents will be put in the information repository as they become available. Repository hours are 8 am to 5 pm - Tuesday through Saturday.

The U.S. EPA recently completed a RCRA Facility Inspection (RFI) of the ACE Company facility. It is located at 2700 Falmouth Highway, approximately 2 miles southeast of the town of Cranston, in upper Montgomery County, Pennsylvania. On the basis of this RFI, EPA proposes that ACE take corrective actions to remedy existing environmental contamination at the facility site. The contamination is the result of the improper disposal of untreated chemical by-products of ACE Company's manufacturing processes into a pond adjacent to the facility site. A corrective measures study is currently underway to develop, screen, and evaluate potential corrective measures at the facility.

For further information please contact: Franklin Pratt, Community Relations Coordinator; U.S. Environmental Protection Agency; 841 Chestnut Street; Philadelphia, PA 19107; (215)xxx-xxxx. The Ace Company contact is: Roberta Stiltwell, Public Relations Officer; Ace Company; 345 Filmont Street, Cranston, PA 19436; (717)xxx-xxxx.

## APPENDIX F

# Sample Public Notice of Proposed Corrective Action Measure



**The United States Protection Agency (EPA)  
Invites Public Comments on  
RCRA Facility Investigation/Corrective Measures Study  
and Proposed Corrective Action Measure  
at the ACE Company Facility  
In Cranston, Pennsylvania**

The U.S. EPA announces the beginning of a thirty day public comment period during which EPA invites both written and oral comments from the public on the Resource Conservation and Recovery Act (RCRA) Facility Investigation/Corrective Measures Study and the Proposed Corrective Action Measure for the ACE Company manufacturing facility near Cranston, Pennsylvania. If there is community interest, EPA also will hold a public meeting on this matter. Please direct all comments and requests for a meeting to the EPA contact listed below.

The ACE Company facility is located at 2700 Falmouth Highway, approximately 2 miles southeast of the town of Cranston, in upper Montgomery County, Pennsylvania. ACE Company manufactures titanium dioxide pigments at the facility. The principal chemicals used by ACE Company in its manufacturing activities are: 1, 1, 1-trichloroethane, ethylene glycol, sodium hydroxide, xylene and sulfuric acid. As a result of its operations, ACE Company is subject to EPA's RCRA regulations governing the handling, storage, treatment and disposal of hazardous wastes. The ACE Company facility was cited by EPA for improperly disposing of untreated chemical by-products into a pond adjacent to the facility site.

On October 10, 1989, ACE Company and EPA entered into a Consent Order pursuant to Section 3008(h) of RCRA. Under the terms of this Consent Order, ACE conducted an investigation of its facility in December 1989 and has recently completed a study which evaluated various cleanup alternatives. ACE Company has submitted a Corrective Measures Study for responding to the contamination problem to EPA for approval. The Corrective Measures Study evaluated four measures for addressing contaminated water in the nearby pond. These are:

- **No action.** This alternative would allow the contaminated water to remain in the pond.
- **Conventional Water Treatment.** This alternative involves recovering the contaminated water from the pond and passing it through a cascade aerator, a precipitation unit, and a sand filtration unit.
- **Modified Conventional Treatment.** This alternative involves passing the recovered water through an equalization chamber, a cascade aeration unit combined with a blower, a precipitation unit, a sedimentation chamber, and a sand filter.
- **Enhanced Conventional Treatment.** This alternative involves passing the recovered water through an equalization chamber, passing air through it using a high-velocity nozzle aerator, a precipitation unit, a sedimentation chamber, a granular filter, and an ion exchange polisher ("green sand").

The preferred measure for remedying the contaminated water at the facility is Modified Conventional Treatment. EPA finds this treatment method is the most proven, cost-effective and thorough alternative examined.

Although this is the preferred alternative at present, EPA welcomes comments on all measures studied. EPA will make the final choice after the public comment period has concluded, and may choose a measure other than the initial preferred measure. More information on EPA's decision can be found in the Statement of Basis. Additional information concerning the alternatives can be found in the RCRA Facility Investigation Report and the Corrective Measures Study. All of these reports can be found in the information repository located in the the City Clerk's office of the Cranston City Hall Building, 235 Loudon Avenue, Cranston, Pennsylvania 19436. Repository hours are 8 am to 5 pm - Tuesday through Saturday.

The public comment period is from Tuesday, November 13, 1990 through Thursday, December 13, 1990. Comments may be submitted either orally or in writing. Comments must be submitted to EPA if they are to be included in EPA's deliberations. Please address all comments to: Franklin Pratt, Community Relations Coordinator; U.S. Environmental Protection Agency; 841 Chestnut Street, Philadelphia, PA 19107; (215)xxx-xxxx. The ACE Company contact is: Roberta Stiltwell, Public Relations Officer; ACE Company; 345 Filmont Street, Cranston, PA 19436; (717)xxx-xxxx.