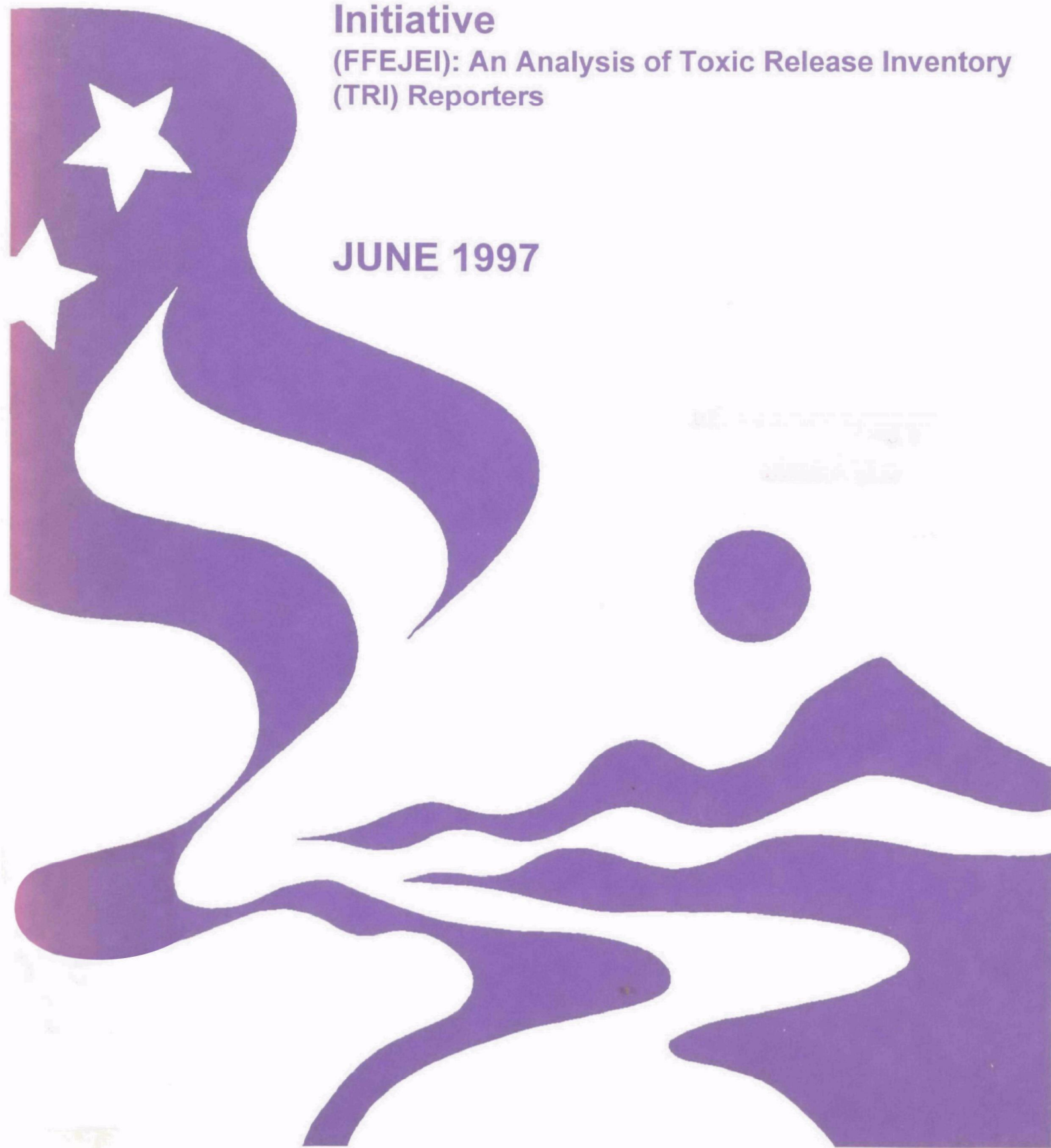




Federal Facilities Environmental Justice Enforcement Initiative

**(FFEJEI): An Analysis of Toxic Release Inventory
(TRI) Reporters**

JUNE 1997



ACKNOWLEDGMENTS

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EXECUTIVE SUMMARY

This report discusses the preliminary results of the Federal Facilities Environmental Justice Enforcement Initiative (FFEJEI). It is intended to provide EPA Headquarters, EPA Regional offices, and other Federal agencies with an overview of the initiative and to identify Federal facilities that are potential environmental justice sites which may have significant environmental issues present. In August of 1996, the Federal Facilities Enforcement Office (FFEO) initiated the FFEJEI. FFEJEI is intended to increase enforcement targeting efforts at Federal facilities, and to place emphasis on enforcement efforts in possible environmental justice communities. The National Environmental Justice Advisory Council (NEJAC) Enforcement Subcommittee, which was established to provide recommendations on how the Office of Enforcement and Compliance Assurance (OECA) might integrate environmental justice into its programs, policies, and activities, recommended that FFEO conduct a targeted enforcement effort at Federal facilities. The goal of FFEJEI is to assist the Regions in identifying Federal facilities that may pose environmental justice concerns to low income and minority communities surrounding the facilities.

This initiative employs several screens for evaluating the Toxic Release Inventory (TRI) data. TRI data from 1994 was used as the baseline for evaluation for this initiative. In 1994, the first year of reporting required by Federal agencies, 191 Federal facilities reported releases and transfers of toxic chemicals under TRI. A series of data screens were used to filter sites based on compliance, health, and demographic information. The first screen used on the 191 facilities was a TRI Relative Risk-Based Chronic Health Indicator model. The second screen employed several enforcement databases to evaluate the compliance records of the facilities. In addition, FFEO relied on both community reports of environmental justice concerns and geographic distribution to identify facilities posing potential environmental justice concerns. Lastly, Geographic Information System (GIS) maps were generated for the 44 sites from these screens to illustrate the low income and/or minority communities surrounding the facilities. FFEJEI can be used as a tool for planning and targeting inspections and related enforcement activities at Federal facilities.

FFEJEI HIGHLIGHTS

- **44** facilities were identified as potential environmental justice sites.
- The majority of the 44 facilities are located in Regions 4, 6, and 9.
- Of the 44 sites:
 - 77% are DoD
 - 18% are DOE
 - 5% are CFA.
- Compliance data:
 - 12 sites have recent violations
 - 13 are in Significant Noncompliance
 - 17 are NPL sites.
- Regions 3, 4, and 9 have the most TRI reporting sites.

LIST of ACRONYMS and ABBREVIATIONS

AIEO	American Indian Environmental Office
AO	Administrative Order
ARCVIEW	A GIS mapping software
CAA	Clean Air Act
CFA	Civilian Federal Agency
DoD	Department of Defense
DOE	Department of Energy
EJ	Environmental Justice
EO	Executive Order
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
FFC	Federal Facility Coordinator
FFEO	Federal Facilities Enforcement Office
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FFEJEI	Federal Facilities Environmental Justice Enforcement Initiative
FFERDC	Federal Facilities Environmental Restoration Dialogue Committee
FFTS	Federal Facilities Tracking System
GIS	Geographic Information Systems
IDEA	Integrated Data for Enforcement Analysis System
NEJAC	National Environmental Justice Advisory Council
NOV	Notice of Violation
NPDES	National Pollution Discharge Elimination System
NPL	National Priority List
OECA	Office of Enforcement and Compliance Assurance
OPPT	Office of Pollution Prevention and Toxics
POTW	Publicly Owned Treatment Works
P2	Pollution Prevention
RCRA	Resource Conservation and Recovery Act
SNC	Significant Noncompliance
TRI	Toxic Release Inventory
TSCA	Toxic Substance Control Act

TABLE OF CONTENTS

ACKNOWLEDGMENTS

EXECUTIVE SUMMARY	Page i
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LIST OF ACRONYMS AND ABBREVIATIONS	Page ii
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1. INTRODUCTION	Page 1
A. Federal Facilities Environmental Justice Enforcement Initiative	Page 2
2. METHODOLOGY AND SOURCES OF DATA	Page 3
A. Data Sources	Page 3
B. Methodology Overview	Page 3
C. TRI Facility Baseline List	Page 3
D. Relative Health Risks	Page 4
E. Compliance History	Page 5
F. Community Based and Other Reports of Environmental Justice Concerns .	Page 5
G. Geographic Distribution	Page 6
H. Demographics	Page 6
I. Exhibit	Page 7
3. PRELIMINARY RESULTS OF THE INITIATIVE	Page 9
A. Analysis of Federal Facilities with TRI Releases	Page 9
B. Analysis of Top 100 Sites	Page 9
C. Analysis of 44 Sites	Page 9
D. Statistical Charts Illustrating the Results	Page 11
4. CONCLUSION	Page 21
5. APPENDIX	Page 23
A. Prioritization of Facilities	Page 23
B. Example of Prioritization: U.S. DOE Savannah River Site	Page 24
C. Distribution Map	Page 28
Site Listings	Page 29
GIS Map Categorization Matrix	Page 30
44 GIS Maps	Page 32-75
D. Definition of Significant Noncompliance	Page 76
E. Regional Environmental Justice Contacts	Page 78
F. Regional Federal Facility Coordinators	Page 79
G. Regional TRI Contacts	Page 80

I: INTRODUCTION

Environmental justice is the equal and fair environmental protection of all people regardless of race, ethnicity, religion, class, and economic status.

Traditionally, government agencies have set broad standards for hazardous pollutants and assumed that all people would be equally protected by these standards. Recent studies indicate however, that minority and low-income populations may face a disproportionate share of environmental problems and higher levels of contamination of their air, water, and land.

The Clinton Administration mandated that the Environmental Protection Agency (EPA) and other Federal agencies implement changes to ensure equal and fair environmental protection for all people. These mandates call for changes with respect to the development, implementation, and enforcement of all environmental policies.

Executive Order (E.O.) 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," was issued on February 11, 1994. The Executive Order has greatly impacted the integration of environmental justice into the policy, programs, and activities of Federal agencies. It requires Federal agencies to identify and address situations where minority and low income populations are disproportionately affected by environmental impacts, as well as to direct Federal agencies in developing environmental justice strategies.

Federal agencies, like private entities, are required to comply with all Federal, State, and local environmental regulations. E.O. 12898 specifically states that Federal agencies are responsible for developing an environmental justice strategy that describes steps they will take to meet these goals. An agency's environmental justice strategy should include revisions to their environmental programs, policies, planning processes, enforcement strategies, and rulemakings.

The National Environmental Justice Advisory Council (NEJAC) was established to provide public policy advice and recommendations to EPA for improving the implementation of EPA's environmental justice programs and initiatives. Specific NEJAC duties include providing guidance on identifying environmental justice issues, stimulating cooperation between agencies, coordinating research and data collection efforts, examining existing data and studies on environmental justice, and maintaining a structure and schedule for agencies to implement their environmental justice strategy.

EPA's Federal Facilities Enforcement Office (FFEO), as part of the Office of Enforcement

and Compliance Assurance (OECA), oversees Federal facility compliance with requirements related to environmental justice under E.O. 12898, pollution prevention standards under E.O. 12856, "Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements," and the requirements of other Executive Orders. In addition, FFEO is responsible for assisting Federal facilities in developing and improving their compliance programs. FFEO has developed several initiatives to assist Federal facilities in addressing environmental justice concerns. For example, FFEO has prepared a Pollution Prevention (P2) Planning Guide, an Agency-Wide P2 Strategy, and a Multi-Media Guidance to assist EPA's Federal Facility Coordinators (FFCs) in addressing multi-media compliance issues at Federal facilities. FFEO also has conducted 25 Environmental Justice Geographic Information System (GIS) Profiles of defense and civilian Federal facilities covered under the Pollution Prevention Executive Order.

I. A Federal Facilities Environmental Justice Enforcement Initiative

In August of 1996, FFEO initiated the Federal Facilities Environmental Justice Enforcement Initiative (FFEJEI). FFEJEI is intended to augment inspection and enforcement targeting efforts at Federal facilities, and to place emphasis on enforcement efforts in environmental justice communities. The NEJAC Enforcement Subcommittee, which was established to provide recommendations on how OECA might integrate environmental justice into its programs, policies, and activities, recommended that FFEO conduct such an effort. FFEO believes the FFEJEI is one tool to help identify Federal facilities that may have enforcement and compliance concerns. The goal of FFEJEI is to assist the Regions in identifying Federal facilities that may pose environmental justice concerns to low income and minority communities surrounding the facilities.

This report discusses the preliminary results of FFEJEI. It is intended to provide EPA Headquarters, EPA regional offices, and other Federal agencies with an overview of the initiative and to identify Federal facilities which may be potential environmental justice sites and may have environmental issues present. The data provided in this report were compiled from various Federal sources, such as the 1994 Toxic Release Inventory (TRI) Data Report, Federal Facilities Tracking System (FFTS), Regional Environmental Justice (EJ) Coordinators and Federal Facility Coordinators, the Office of Environmental Justice (OEJ), the American Indian Environmental Office (AIEO), NEJAC reports, the Federal Facilities Environmental Restoration Dialogue Committee (FFERDC), and several EPA hotlines.

The remainder of this report is divided into four sections, and an appendix. Section II of this report discusses the methodology used to identify potential sites, and describes how the data were categorized and compiled. Section III summarizes the results of the initiative. Section IV contains concluding remarks and also includes recommended uses for FFEJEI. The appendix contains the forty-four GIS maps of the Federal facilities targeted as potential environmental justice sites, and also identifies regional EJ Coordinators, FFCs, and TRI contacts. The appendix also contains a discussion of one of the site maps and a description of the features of the map.

II: METHODOLOGY AND SOURCES OF DATA

II. A. Data Sources

The data contained in this report were compiled from a variety of sources: EPA databases, Census Bureau data, community reporting, EPA hotlines, and NEJAC reports. These sources were used to generate Federal facility compliance and enforcement data, identify the potential health risks posed by Federal facilities, and determine the demographics of communities located in the vicinity of the facilities discussed in this report.

FFTS contains multi-media Federal facility compliance and enforcement information which FFEO used to identify facilities meeting the compliance criteria of FFEJEI (see Section II.D. below). FFEO also reviewed the National Priorities List (NPL) and the quarterly significant noncompliance (SNC) report to identify Federal facilities listed as NPL sites and/or in SNC. The TRI Relative Risk-Based Chronic Human Health Indicator model developed in the Office of Prevention, Pesticides and Toxics (OPPT) allowed FFEO to measure the relative health risks associated with releases at Federal facilities.

To further identify facilities with potential environmental justice concerns, FFEO looked to community reporting and information gathered from EPA hotlines, NEJAC reports, the FFERDC, EJ Coordinators and FFCs. In addition, FFEO asked OEJ and AIEO to verify the existence of any targeting initiatives or mapping of geographic areas of environmental concern. Lastly, FFEO employed 1990 Census Bureau data which was used in combination with ARCVIEW, a GIS mapping program, to evaluate the demographics of communities located in the vicinity of the Federal facilities.

II. B. Methodology Overview

FFEO employed the following four criteria to assist in narrowing the scope of FFEJEI: compliance history; relative health risks; community based and other reporting of environmental justice concerns; and geographic distribution. FFEO researched and analyzed each of the criteria and then used them to determine which sites posed potential environmental justice concerns. Based on these four criteria, FFEO identified 44 facilities which may pose such concerns. FFEO then generated GIS maps displaying the demographics of the community surrounding each site.

II. C. TRI Facility Baseline List

Before examining Federal facility compliance data FFEO needed to decide upon the baseline of Federal facilities that would be used as the starting point for this initiative. The Toxic Release Inventory was chosen as a starting point because it is community based, has known transfers and releases of toxic chemicals, and is publicly available information. The 1994 TRI Data Report of 191 Federal facilities with known releases of toxic chemicals was used as a baseline. This list served as the universe of Federal facilities which FFEO based its subsequent

analysis.

TRI reporting by Federal facilities was mandated under Executive Order 12856, signed by President Clinton in August 1993. The latest report, published in June 1996, covers the 1994 reporting year, which was the first year of required reporting for Federal facilities. The goal of the TRI reporting requirement is to ensure that the public has access to the most comprehensive information possible on releases and transfers of toxic chemicals, to hold Federal facilities accountable for their activities, and to encourage them in reducing their use of toxic chemicals at the source.

II. D. Relative Health Risks

The first criterion used to identify potential environmental justice sites was the relative health risks posed by a facility to populations in the immediate vicinity of the site. FFEO employed the TRI Indicator Model, developed in OPPT, to measure these relative health risks. The model used TRI reporting data for the calendar year 1994.

The TRI Indicator Model tallies the number of indicator "hits" for each facility. A facility would be assigned an indicator "hit" if the chemicals released were high in toxicity and were released in sufficient amounts to pose a threat to the surrounding community based

upon exposure pathways and medium of potential exposure. The TRI Indicator model addresses exposures to the population beyond the facility fence line.

For 1994, 191 Federal facilities operated by 12 Federal agencies and located in 43 states reported to EPA under TRI.

Limitation of TRI Data

The total amount of TRI emissions reported by Federal facilities during 1994 was approximately 10.1 million pounds. The total amount of off-site transfers reported by Federal facilities was approximately 10.2 million pounds (excluding POTW transfers). However, the TRI Indicator Model does not evaluate underground injection (approximately 500,000 pounds) or most on-site landfilling since such wastes are often sent to hazardous waste landfills (approximately 1 million pounds). There also are a number of chemicals with significant air releases which were not modeled because they have no assigned toxicity weight.

EPA first ranked all TRI Federal facilities based on the quantity of chemicals released. A second ranking using the full model revealed there were considerable differences between the simple quantity released ranking and the more sophisticated relative-risk based ranking. EPA elected to use the full model to identify the top 100 facilities, then used the model to rank these from one to one hundred. EPA analyzed the top twenty Federal facilities ranked by relative risk-

based impacts to examine impacts on the five environmental media for this group (fugitive air, stack air, direct water, landfill, and a publicly owned treatment work (POTW) transfer). Based on its review, the Agency determined that on-site stack air releases have the most significant impact on relative risk; although fugitive air and direct water releases also contribute to relative risk.

II. E. Compliance History

FFEO used compliance and enforcement information as the second criterion to identify Federal facilities posing potential environmental justice concerns. FFEO examined the following factors: 1) whether a facility has been inspected in the last two years, 2) facilities where EPA or State enforcement actions are taking place, and 3) whether a facility is a National Priority List (NPL) site or in Significant Noncompliance (SNC). NPL sites were chosen because of past practices and known contamination.

FFEO compared the 191 Federal facilities against the most recent version of the 1996 NPL and the 3rd Quarter FY 1996 SNC Report. Facilities in SNC are those having a violation of significant magnitude and/or duration that warrants priority for review and/or response by an agency. SNC applies to Federal facilities regulated under the Resource Conservation and Recovery Act (RCRA), the National Pollutant Discharge Elimination System (NPDES), Clean Air Act (CAA), Toxic Substances Control Act (TSCA), Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and the Emergency Planning and Community Right-to-Know Act (EPCRA). Facilities in SNC are identified on the basis of certain data fields within the IDEA system. The precise nature of these fields varies across statutes. (See appendix for listing of the SNC fields.)

Formal Enforcement Actions:

- ***Notice of Violations (NOVs)***
- ***State & Federal Administrative Orders (AOs)***
- ***Noncompliance Penalty Assessments***
- ***EPA Referral Notices to States***

II. F. Community Based and Other Reports of Environmental Justice Concerns

As the third criterion, FFEO used community reports and information gathered from EPA hotlines, NEJAC reports and meetings, public meetings, FFERDC, several EPA offices, the regional EJ Coordinators and FFCs. Federal facilities previously identified as environmental justice areas of concern through community reporting efforts or information gathered from these other sources were automatically selected for targeting by FFEJEI.

Federal facilities previously identified as environmental justice areas of concern include: 1) U.S. Army Pine Bluff Arsenal, Jefferson County, Arkansas, 2) U.S. Navy Pensacola, Escambia County, Florida, 3) U.S. DOE Sandia National Lab, Bernalillo County, New Mexico, 4) U.S. DOE Savannah River Site, Aiken County, South Carolina, and 5) Kelly Air Force Base Force Base, Bexar County, Texas.

II. G. Geographic Distribution

The fourth criterion used to identify potential environmental justice sites was geographic distribution. FFEO wanted to have at least one site represented in each of the 10 EPA regions. Since no sites met the FFEJEI criteria in Region 1, the Defense Logistics Agency (DLA) facility located in Portsmouth, Rhode Island was included in the initiative. Bolling Air Force Base in Washington, DC was selected as a representative site in our Nations Capital.

II. H. Demographics

FFEO used the information derived from the evaluation criteria to identify the 44 sites targeted under FFEJEI. For further analysis, FFEO then conducted a search on these sites to evaluate the demographics of the population surrounding each site, generate GIS maps, and ultimately determine whether these sites are likely to be environmental justice areas.

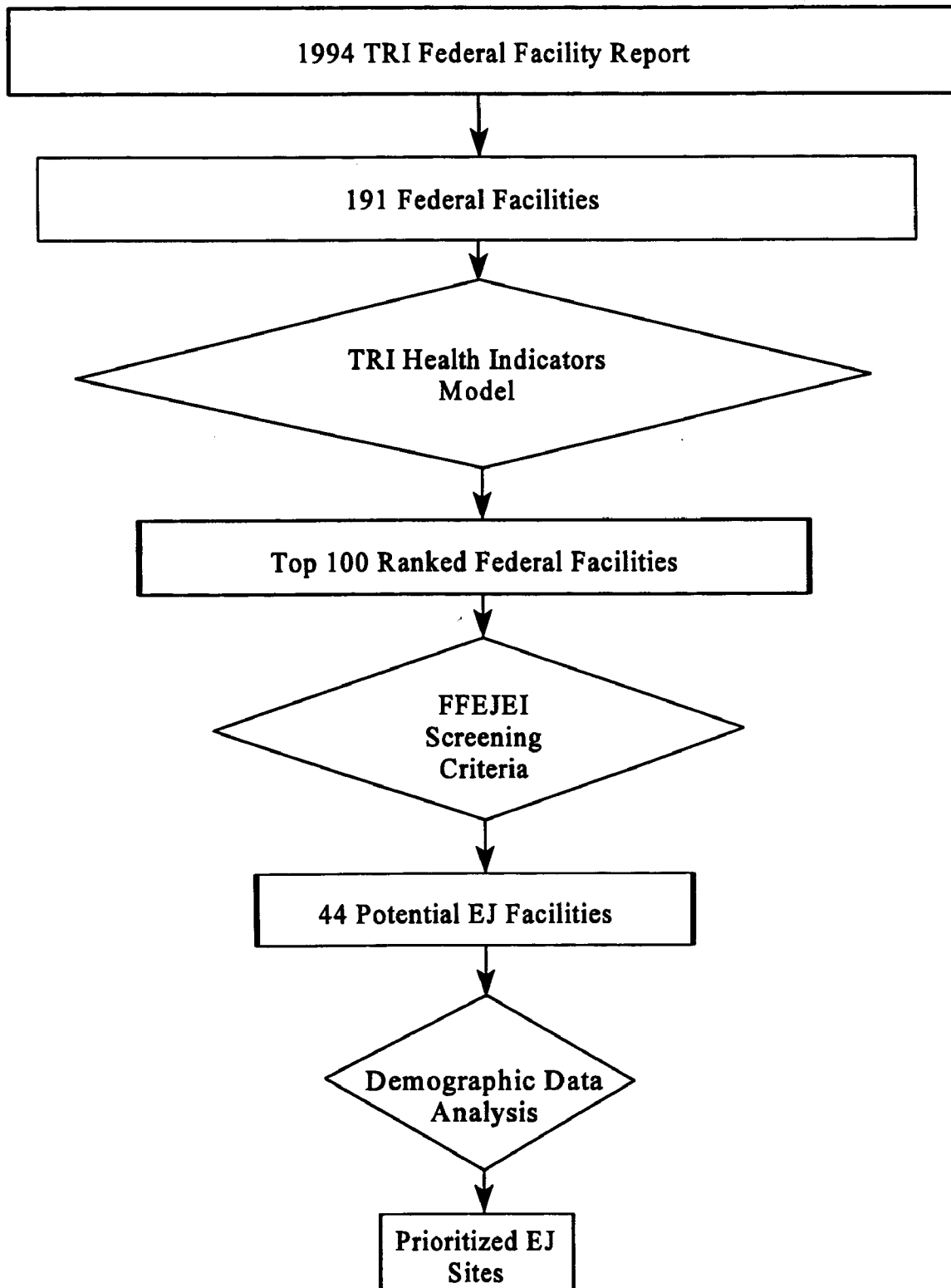
The demographic information was collected from 1990 Census Bureau data. Demographic data are generally collected and organized by specific geographic regions, termed census tracts. A geographic region is defined as a compilation of zip codes and counties surrounding a site. The zip code is a common geographic factor used to identify the relationship between the locations and demographics of a local population. For this initiative, FFEO identified population composition and economic disparity of the population in the vicinity of a site as the most important demographic statistics to investigate.

Once the demographic data of the 44 facilities were analyzed, GIS maps indicating facility location, as well as economic and racial composition of the surrounding populations, were generated. A map of each of the 44 targeted facilities was then created using ARCVIEW mapping software.

Many Federal installations are large in size, therefore the environmental impacts they may have on the surrounding community are potentially great. To define an area of investigation, EPA established a radius around the center of each facility. A ten-mile radius was used for smaller facilities, and a twenty-mile radius for larger facilities. Census Bureau data of the populations located within the radii were then examined. Communities with zip codes inside the radius were grouped into the following categories: 1) communities with greater than 25% minority, 2) communities with greater than 25% of families below the poverty level of \$15,000, and 3) communities with greater than 25% of all households with an income of \$15,000 or less. The data were then displayed as shaded regions on the GIS maps.

The process used to identify Federal facilities that potentially pose environmental justice concerns may be summarized by the exhibit on the following page.

FFEJEI EVALUATION PROCESS



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III: PRELIMINARY RESULTS OF THE INITIATIVE

FFEJEI provided EPA Headquarters and regions with a list of 44 Federal facilities that pose potential environmental justice concerns to surrounding communities. While examining the data from the initiative, FFEO gained valuable insight about the compliance history and health risks associated with these 44 Federal facilities.

III. A. Analysis of Federal Facilities with TRI Releases

In 1994, 191 Federal facilities reported total TRI emissions of 10.1 million pounds. Of the 191 Federal facilities evaluated, 66% are Department of Defense sites, 21% are Civilian Federal Agency sites, and 12% are Department of Energy sites. The EPA Regions containing most of the TRI reporting sites are Region 3, Region 4, and Region 9. Region 3 contains 25 TRI reporting sites, while Regions 4 and 9 contain 41 and 35 sites respectively.

III. B. Analysis of Top 100 Sites

The TRI Indicator model ranked the top 100 facilities based on relative risk-based impacts. Within the top 100 facilities, 71% are DoD sites, 15% are CFA sites, and 14% are DOE sites. The majority of the facilities are located within Region 3, Region 4, and Region 6. Region 3 contains 13 facilities, while Regions 4 and 6 contain 25 and 16 facilities respectively.

Analysis of the compliance data for the top 100 sites revealed that Regions 3, 4, and 9 had the largest number of Federal facilities with compliance indicator "hits". DoD had the sites with the most compliance "hits" (47), followed by DOE (11) and CFAs (1). It is important to note that 55% of the top 100 ranked sites had no compliance indicator "hits".

The majority of the 44 facilities warranting further evaluation to determine if they pose environmental justice concerns are located in Regions 4, 6, and 9.

III. C. Analysis of 44 Sites

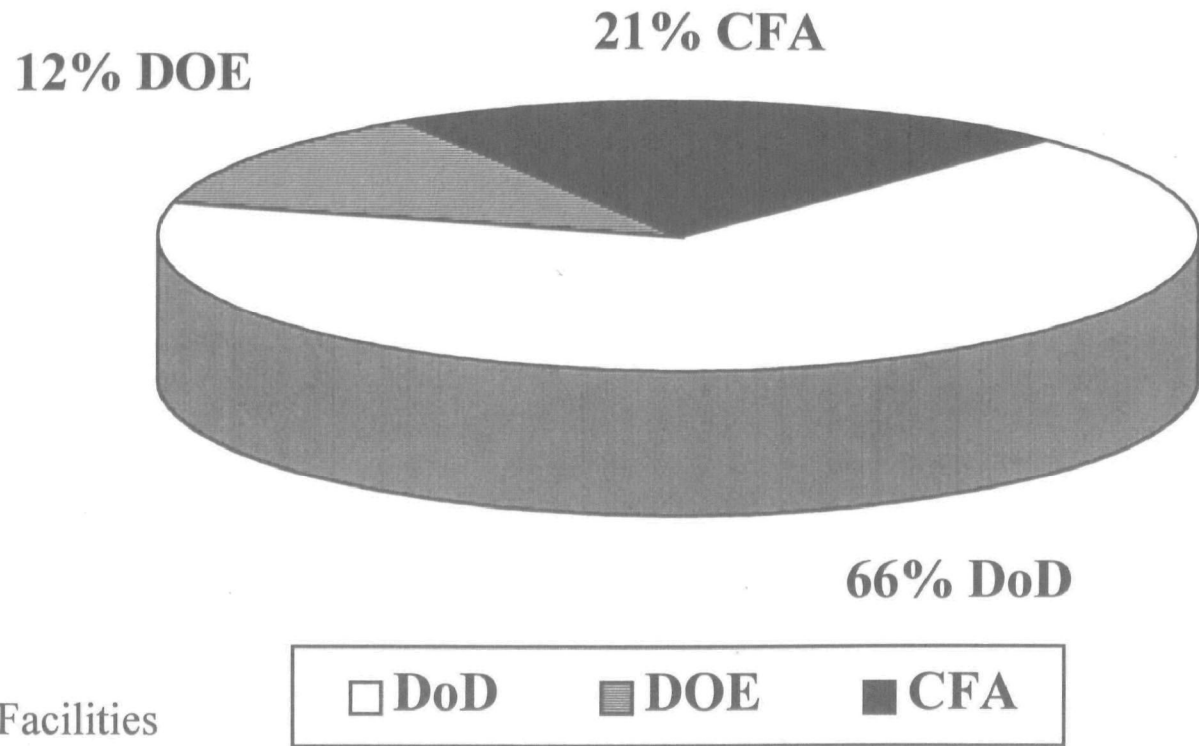
Of the 44 facilities that were identified as potential environmental justice sites, 37 facilities were selected because they met one or more of the FFEJEI's evaluation criteria, five facilities were included because they have previously been identified as environmental justice areas of concern, and two facilities were selected for geographic distribution purposes.

Of these sites, 77% are DoD sites, 18% are DOE sites, and 5% are CFA sites. Further analysis of the data revealed that 41 sites were assigned a toxicity ranking from 1 to 100, 12 have recent violations warranting formal enforcement action, and 13 are presently in SNC. In addition, 17 are classified as NPL sites and four have not been inspected in the past two years. In terms of regional distribution, the majority of the facilities are located within Region 4, Region 6, and Region 9. Region 4 contains 12 facilities, while Region 6 contains 7 facilities and Region 9

contains 6 facilities. The distribution of the remaining facilities is as follows: Region 1 (1), Region 2 (3), Region 3 (4), Region 5 (2), Region 7 (3), Region 8 (2), and Region 9 (4).

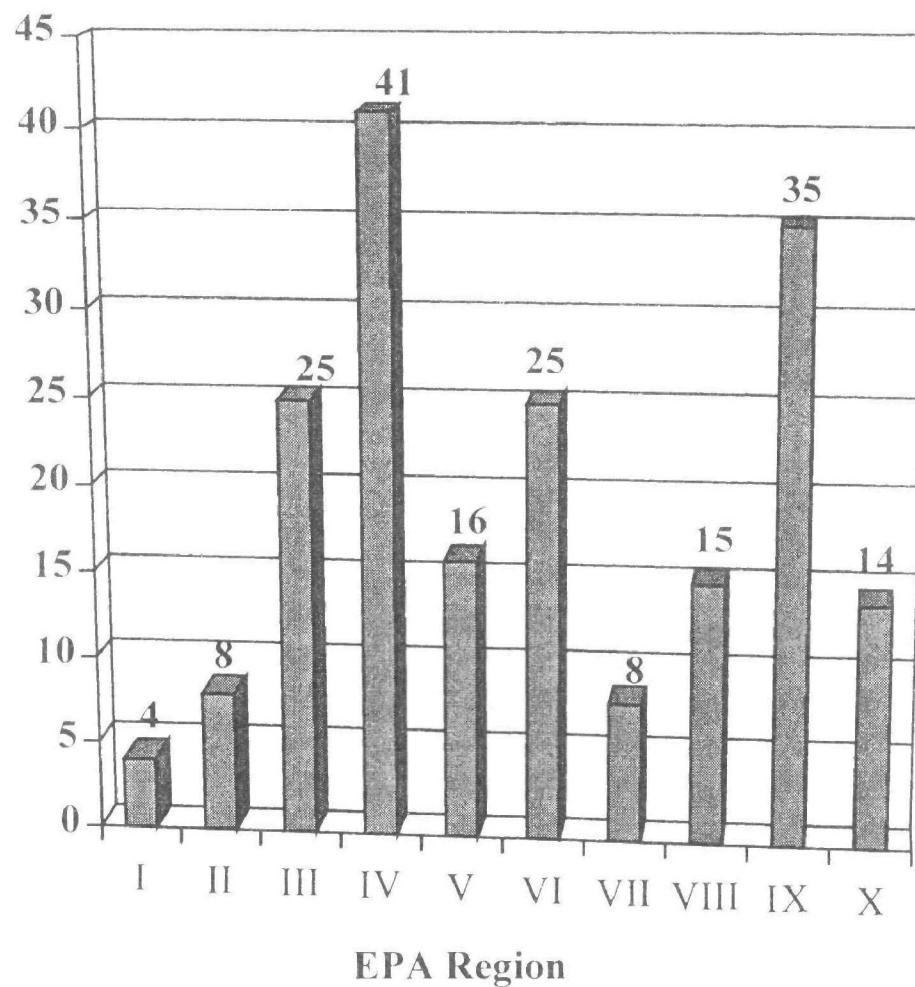
The following pages contain statistical charts illustrating the above information.

1994 FFEJEI TRI Universe by Agency



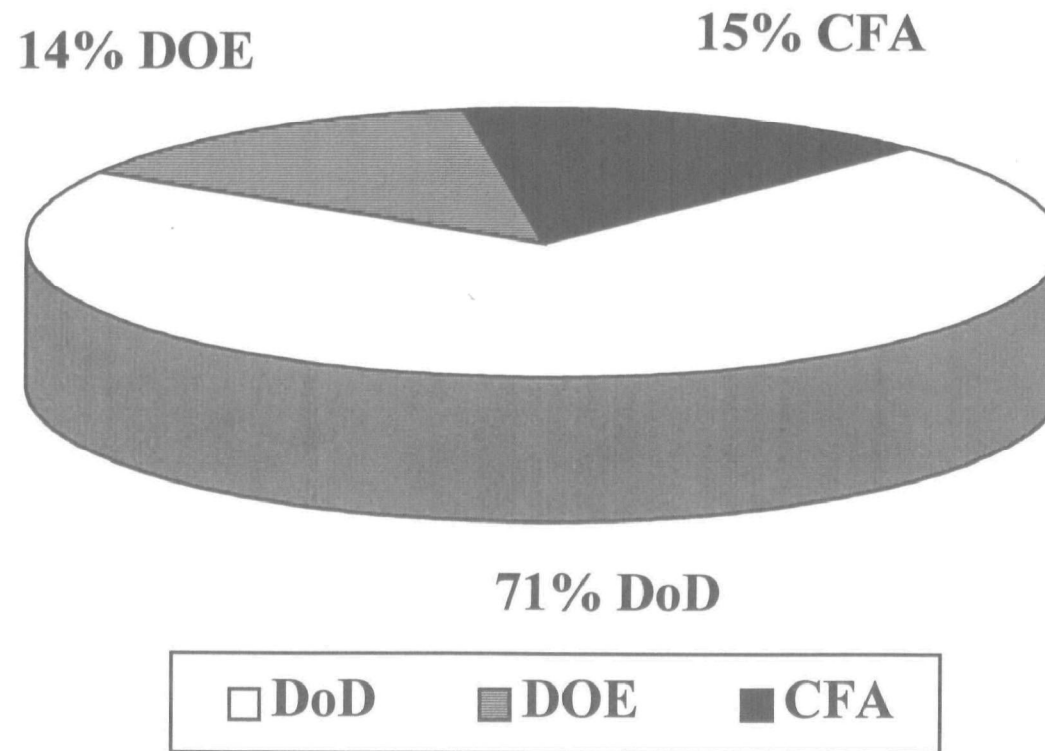
N = 191 Facilities

1994 FFEJEI TRI Universe by Region



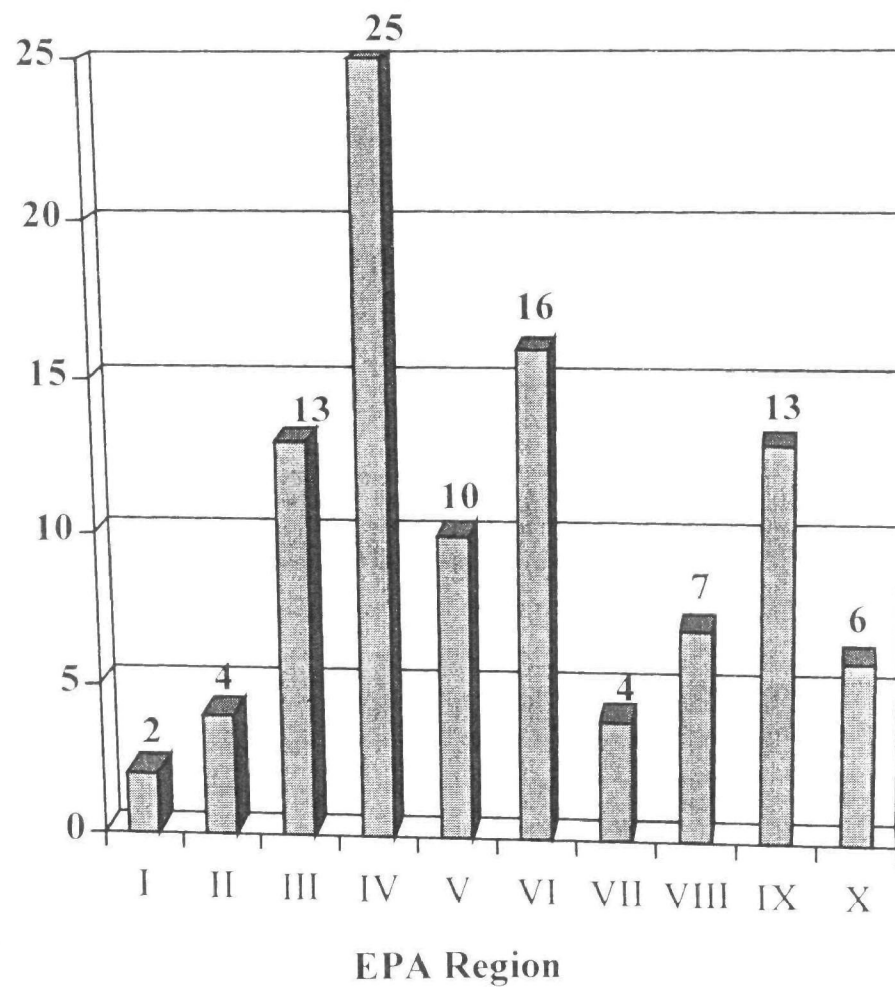
N = 191 Facilities

1994 Top 100 FFEJEI Facilities by Agency



N = 100 Facilities

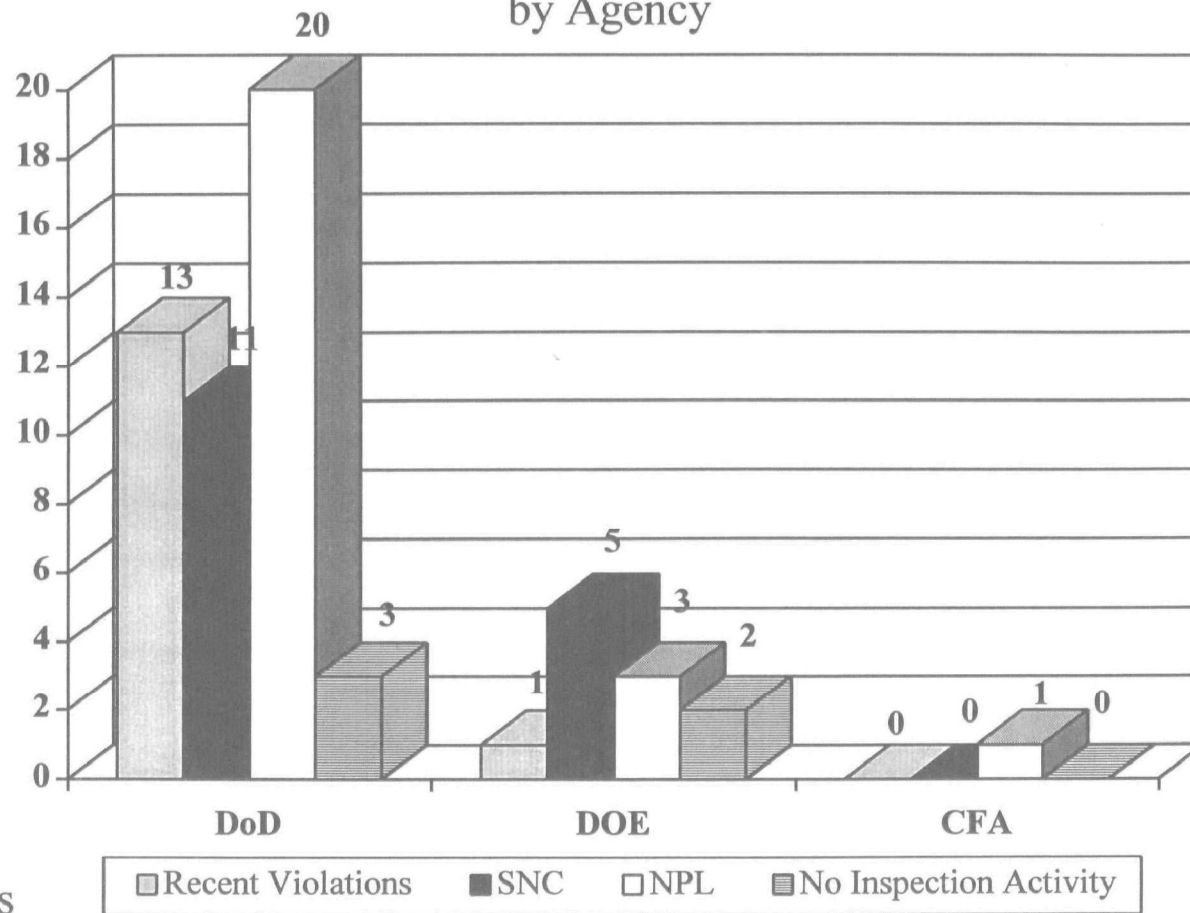
1994 Top 100 FFEJEI Facilities by Region



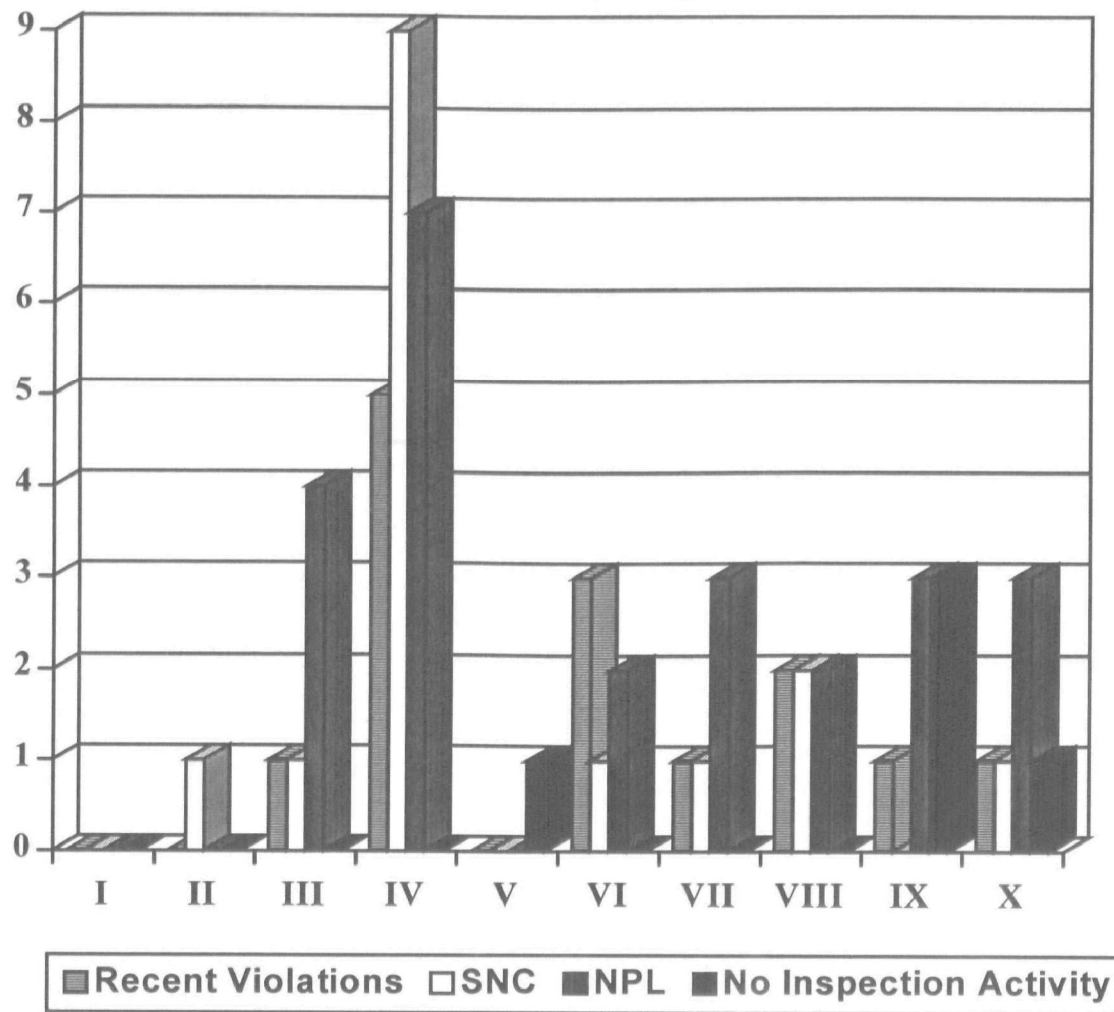
N = 100 Facilities

Number of Compliance Indicator "Hits" for Top 100 FFEJEI Facilities

by Agency

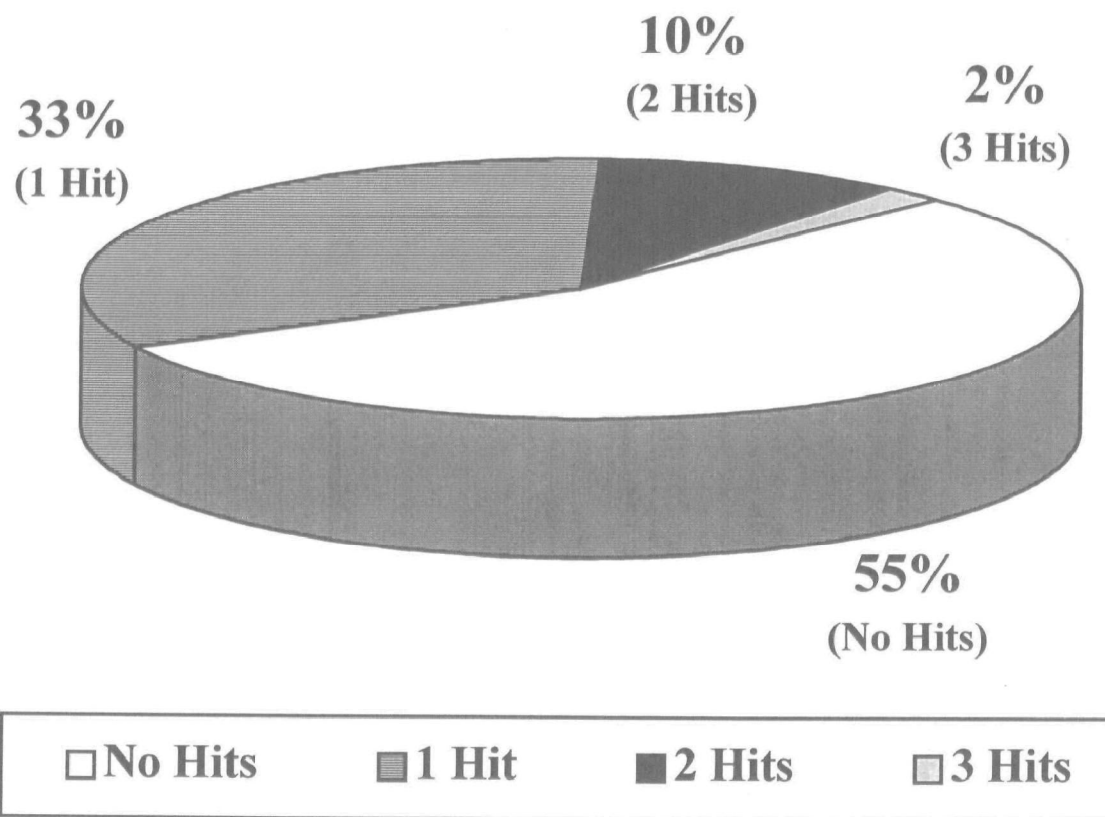


**Number of Compliance Indicator "Hits" for Top 100 FFEJEI
Facilities
by Region**



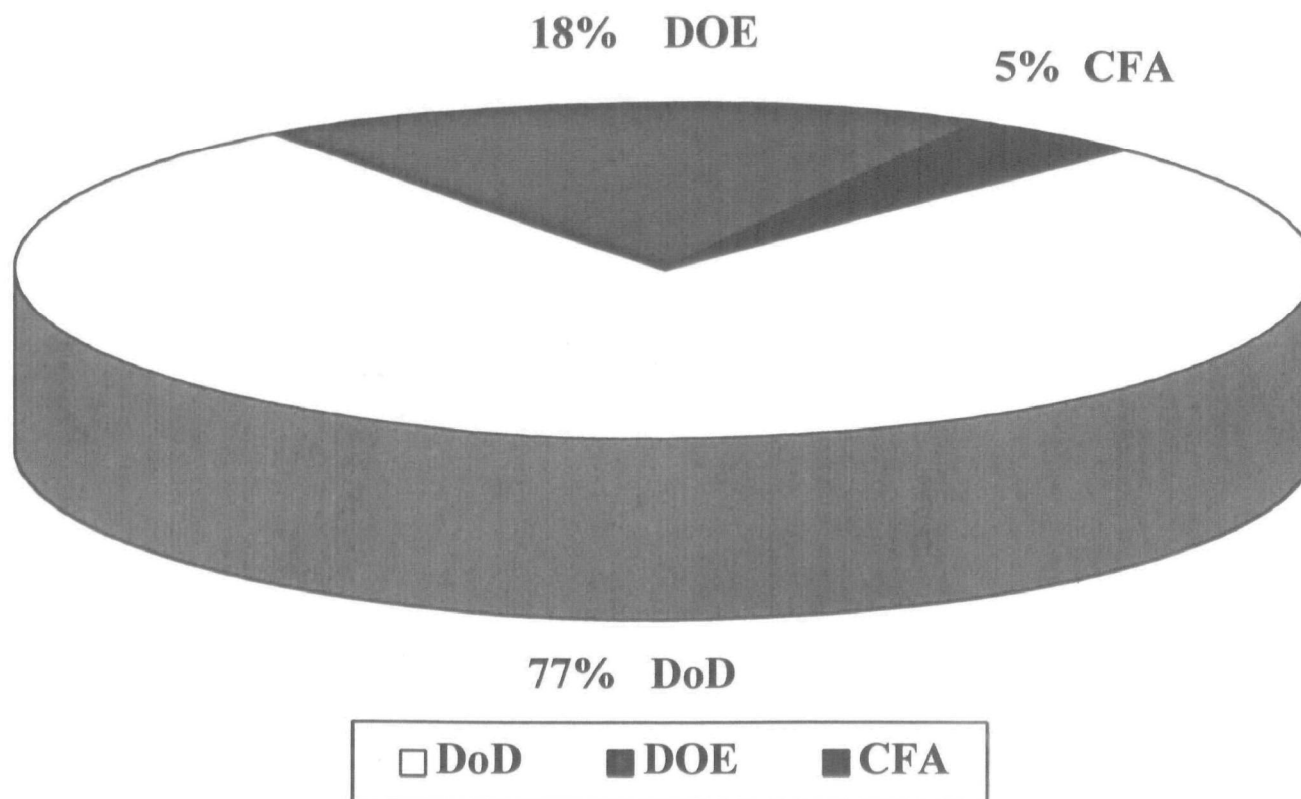
N = 59 Hits

Distribution of Compliance Indicator "Hits" for Top 100 FFEJEI Facilities



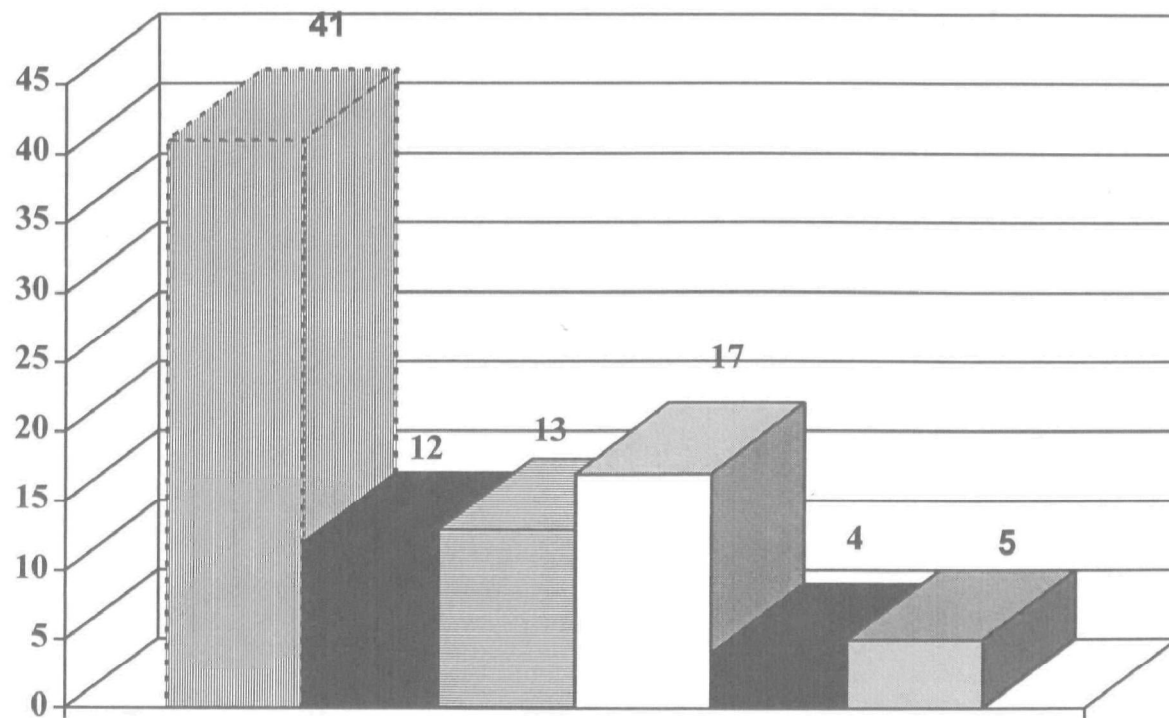
N = 100 Facilities

The 44 Targeted Sites by Agency



N = 44 Facilities

The 44 Targeted Sites Meeting FFEJEI Selection Criteria



N = 44 Facilities

Toxicity Ranking
 Recent Violations
 SNC
 NPL
 No Inspection Activity
 EJ Concerns

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IV: CONCLUSION

The goal of FFEJEI was to identify Federal facilities that may pose potential environmental justice concerns to nearby communities. Of the 191 Federal facilities that reported releases of TRI chemicals, 44 have been identified as requiring additional investigation. Thus, FFEJEI is only the first step in the process of targeting environmental justice enforcement efforts at Federal facilities.

To determine whether these facilities are in fact environmental justice sites, further investigation is necessary. FFEO is therefore disseminating this report to OEJ, the Regional EJ Coordinators and FFCs, and the program offices within each region. With this information, FFCs and single media program offices, can include them in regional inspection initiatives. For example, FFEO will be issuing guidance for fiscal year 1998/1999 to its regional offices encouraging them to include at least one targeted facility per region in their annual multi-media inspections.

In addition, FFEO is encouraging regional EJ Coordinators and FFCs to engage in joint targeting efforts. For instance, in the case of FFEJEI, FFCs can monitor and/or evaluate these potential environmental justice sites through inspections, while EJ coordinators can monitor facilities based upon information gained from community reporting and other efforts. Similarly, it may be beneficial for EJ Coordinators and FFCs to combine their investigation and targeting efforts with those of the National Enforcement Investigation Center (NEIC).

FFEO is also proposing that FFEJEI be made into an annual initiative to be used as an evaluation tool by both EPA Headquarters and the Regions. The goal of FFEJEI, to identify Federal facilities posing potential environmental justice concern would remain the same, however emphasis could be placed on evaluating some of the 100 Top Ranked facilities not selected by this initiative for further targeting, or on new sites as subsequent TRI reports are submitted.

FFEJEI also can serve as the catalyst for other Federal facilities inspection and enforcement targeting initiatives. Environmental justice initiatives that target Federal facilities located in specific geographic regions or belonging to specific Federal agencies such as DoD or DOE can be launched. Additionally, emphasis can be placed on targeting Federal facilities that are located on or near Native American lands or near specific racial/minority groups.

To ensure environmental protection for all, efforts to identify and address situations where populations are disproportionately impacted must be made. FFEJEI, which attempts to focus attention on the environmental and human health conditions of minority and low income populations surrounding Federal facilities, is a tool that can be used to help ensure that equal environmental protection for all people is achieved.

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V: APPENDIX

This appendix contains the GIS maps of the forty-four Federal facilities identified as potential environmental justice areas of concern and identifies regional EJ Coordinators, FFCs, and TRI contacts. In addition, the appendix contains a discussion of which facilities should be given priority when evaluating them for environmental justice concerns, as well as a discussion of the U.S. DOE Savannah River Site. A discussion of the U.S. DOE Savannah River Site is included in order to illustrate how the forty-four sites were categorized and to better explain the demographic data.

A. Prioritization of Facilities

The appendix contains a GIS map for each of the forty-four Federal facilities that have been identified as facilities posing potential environmental justice concerns. Each map reveals the facility's location, and the economic and minority composition of the surrounding populations.

Facilities were categorized according to their demographic data regarding low income, minority, and poverty levels. Each facility was assigned a demographic rating of: High (H), Medium (M), or Low (L). Facilities receiving the "H" rating, are considered most likely to be environmental justice sites. The GIS maps of facilities receiving this rating revealed that most of the area surrounding a facility is greater than 25% minority, greater than 25% of families are low income, and greater than 25% of families live below the poverty level. Facilities receiving the "M" rating are considered likely to be environmental justice sites. The GIS maps of these facilities revealed that some of the area surrounding a facility is greater than 25% minority, greater than 25% of families are low income, and greater than 25% of families live below the poverty level. The final rating, "L", was assigned to facilities with GIS maps which revealed that a small portion of the area surrounding each facility is greater than 25% minority, greater than 25% of families are low income, greater than 25% of families live below the poverty level.

To determine which sites should be given priority for further evaluation, FFEO placed the forty-four sites into one of the following three categories: A Priority, B Priority, or C Priority. Facilities assigned an "A" Priority are those thought to warrant the highest priority for further evaluation, those assigned a "B" Priority are thought to warrant medium priority, and those assigned "C" Priority are considered to be lower in priority. Categorization of the facilities is based upon the number of compliance indicators a facility has, its toxicity ranking, and demographic data. Analysis of all these characteristics determined whether a facility was assigned A, B, or C Priority.

Sites receiving an "A" Priority met all of the following characteristics: 1) a toxicity ranking of under forty, 2) a minimum of two compliance indicators (i.e. NPL, SNC, etc.), and 3) demographic information which revealed that much of the area surrounding the facility has more than 25% of families living below the poverty level, more than 25% of all households are low income, as well as more than 25% of the population is minority. Population composition both

inside and outside of the 10-20 mile radii were examined. All of the sites assigned an "A" Priority received a demographic rating of "H" or "M". However, the following five facilities: 1) U.S. Army Pine Bluff Arsenal, 2) U.S. Navy Pensacola, 3) U.S. DOE Sandia National Lab, 4) U.S. DOE Savannah River, and 5) Kelly Air Force Base, were placed in the "A" Priority category because they had previously been identified through community reporting as environmental justice sites.

A facility was considered a "B" Priority if it met the following characteristics: 1) a toxicity ranking of fifty or less, 2) zero to two compliance indicators, and 3) demographic data that revealed that a moderate area surrounding a facility is more than 25% minority, more than 25% of all families live below the poverty level, and more than 25% of all households are low income. Several of the facilities categorized as "B" Priority, had minority and economically disadvantaged populations located outside of the 10-20 mile radius. Analysis of the demographic data of the sites assigned a "B" Priority revealed that the majority had "H" or "M" demographic ratings. A few "B" Priority facilities received a "L" demographic rating, since the GIS maps generated indicated few areas where the population is greater than 25% minority, greater than 25% of families live below the poverty level, and greater than 25% of households are low income. It should be noted that Bolling Air Force Base, U.S. Army Fort Benning, and U.S. Army Longhorn Ammunition, were assigned "B" Priority because they had at least one compliance indicator and the GIS maps of the sites indicated that most of the area surrounding the facilities is greater than 25% minority, greater than 25% of families live below the poverty level, and greater than 25% of households are low income.

The final category, "C" Priority, was assigned to Federal facilities with the following characteristics: 1) no toxicity ranking or a ranking of ninety or less, 2) zero to one compliance indicators, and 3) demographic data which revealed a small number of surrounding areas on the map where the population is more than 25% minority, more than 25% of families live below the poverty level, and more than 25% of all households are low income. All of the facilities assigned "C" Priority are considered to be unlikely environmental justice sites.

B. Example of Prioritization: U.S. DOE Savannah River Site

The U.S. DOE Savannah River Site, located in Aiken, South Carolina, is used as an example to demonstrate how a facility was categorized as either an A, B, or C Priority. The Savannah River Site is one of the facility's identified by FFEJEI that meets all of the selection criteria discussed in this report.

Upon examining the data, FFEO determined that the Savannah River Site had multiple compliance indicators (3) and a very high toxicity ranking (i.e. ranked in the top ten). In addition, past community reporting efforts and information gathered from other sources indicated that the site was previously identified as an environmental justice area of concern. These factors resulted in the targeting of the Savannah River Site by FFEJEI.

The entire area of the map is approximately thirty miles. The demographics data

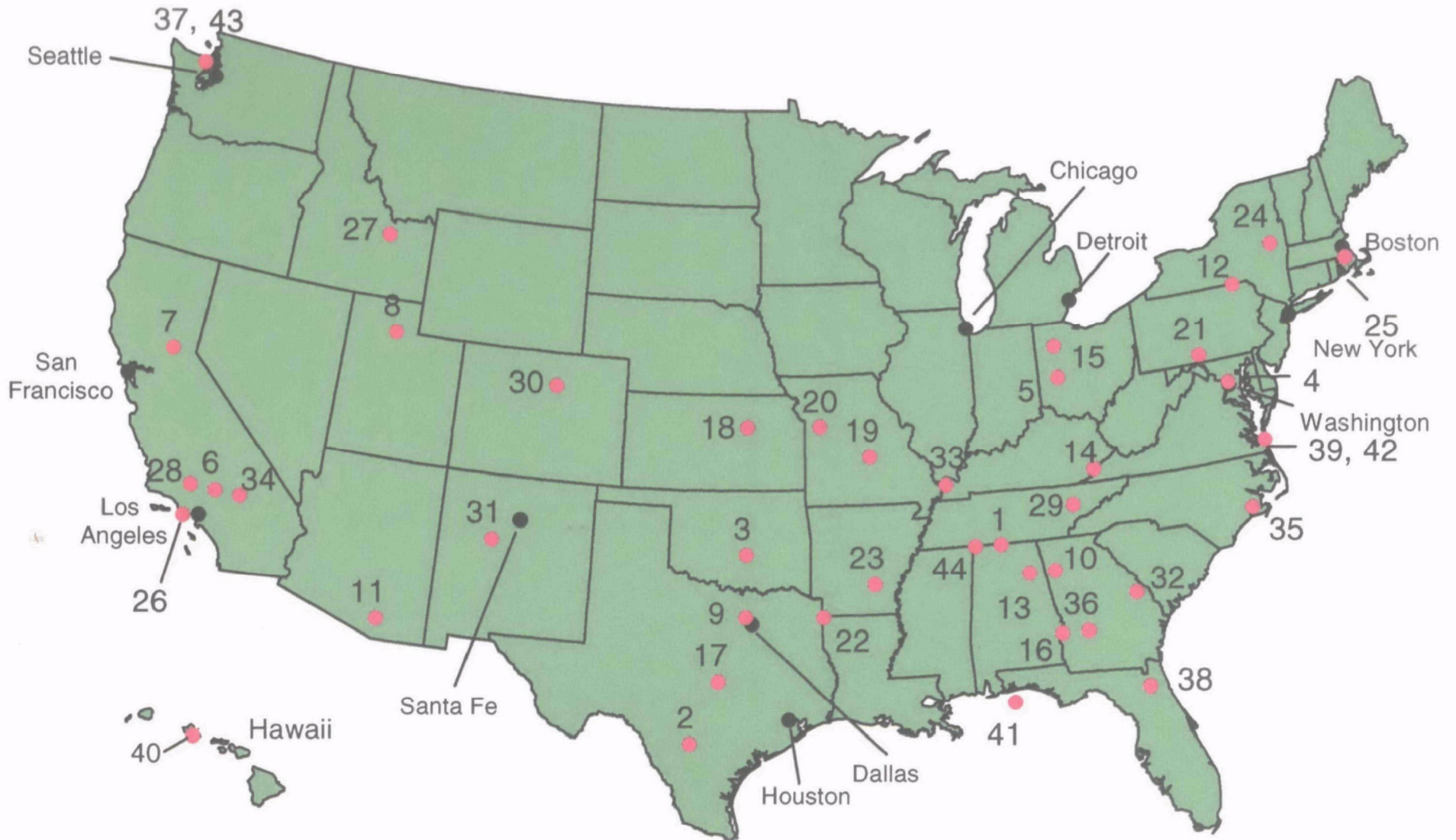
presented on the GIS map revealed that much of the area inside and outside of the established 20 mile radius have a population that is more than 25% minority. On the map, the areas surrounding the facility that are greater than 25% minority are illustrated as striped regions. The demographic data also revealed that there are numerous areas near the facility where more than 25% of the households are low income. Regions on the map illustrating this data are shaded in yellow. Additionally, the demographic data revealed areas surrounding the facility where more than 25% of families are living below the poverty level. This data is illustrated as fuschia shaded regions on the map.

The demographic data together with the compliance, community reporting, and TRI Indicator model data, resulted in the Savannah River Site being characterized as an "A" Priority potential environmental justice area of concern.

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C. DISTRIBUTION MAP, SITE LISTINGS, MATRIX, & GIS MAPS

Environmental Justice Targeting of Federal Facilities



Refer to accompanying table for facility name, city, county, state, and zip code.

Environmental Justice Targeting of Federal Facilities - GIS Analysis

Site	Facility	City	County	State	Zip
1	NASA MARSHALL SPACE FLIGHT FACILITY	HUNTSVILLE	MADISON	AL	35812
2	U.S. AIR FORCE FACILITY	KELLY AFB	BEXAR	TX	78241
3	U.S. AIR FORCE FACILITY	TINKER AFB	OKLAHOMA	OK	73145
4	U.S. AIR FORCE FACILITY	WASHINGTON	DIST OF COLUMBIA	DC	20332
5	U.S. AIR FORCE FACILITY	WRIGHT-PATTERSON	GREENE	OH	45433
6	U.S. AIR FORCE FLIGHT TEST CENTER	EDWARDS	KERN	CA	93524
7	U.S. AIR FORCE MCCLELLAN AIR	SACRAMENTO	SACRAMENTO	CA	95852
8	U.S. AIR FORCE OGDEN FACILITY	HILL AFB	TOOELE	UT	84056
9	U.S. AIR FORCE PLANT 04 TX	FORT WORTH	TARRANT	TX	76108
10	U.S. AIR FORCE PLANT 06 GA	MARIETTA	COBB	GA	30063
11	U.S. AIR FORCE PLANT 44 AZ	TUCSON	PIMA	AZ	85734
12	U.S. AIR FORCE PLANT 59	JOHNSON CITY	BROOME	NY	13790
13	U.S. ARMY FACILITY	ANNISTON	CALHOUN	AL	36201
14	U.S. ARMY FACILITY	KINGSPORT	HAWKINS	TN	37660
15	U.S. ARMY FACILITY	LIMA	ALLEN	OH	45804
16	U.S. ARMY FORT BENNING	COLUMBUS	MUSCOGEE	GA	31905
17	U.S. ARMY FORT HOOD	FORT HOOD	BELL	TX	76544
18	U.S. ARMY FORT RILEY	FORT RILEY	GEARY	KS	66442
19	U.S. ARMY HQ USAEC FACILITY	FORT LEONARD WOOD	PULASKI	MO	65473
20	U.S. ARMY LAKE CITY FACILITY	INDEPENDENCE	JACKSON	MO	64051
21	U.S. ARMY LETTERKENNY FACILITY	CHAMBERSBURG	FRANKLIN	PA	17201
22	U.S. ARMY LONGHORN AMMUNITION	KARNACK	HARRISON	TX	75661
23	U.S. ARMY PINE BLUFF ARSENAL	PINE BLUFF	JEFFERSON	AR	71602
24	U.S. ARMY WATERVLIET ARSENAL	WATERVLIET	ALBANY	NY	12189
25	U.S. DEFENSE LOGISTICS AGENCY	PORTSMOUTH	NEWPORT	RI	02871
26	U.S. DOE ENERGY TECHNOLOGY FACILITY	SIMI HILLS	VENTURA	CA	91311
27	U.S. DOE IDAHO NATIONAL LAB	SCOVILLE	BUTTE	ID	83415
28	U.S. DOE NAVAL PETROLEUM FACILITY	TUPMAN	KERN	CA	93276
29	U.S. DOE OAK RIDGE Y-12 PLANT	OAK RIDGE	ANDERSON	TN	37831
30	U.S. DOE ROCKY FLATS FACILITY	GOLDEN	JEFFERSON	CO	80402
31	U.S. DOE SANDIA NATL. LAB	ALBUQUERQUE	BERNALILLO	NM	87185
32	U.S. DOE SAVANNAH RIVER FACILITY	AIKEN	AIKEN	SC	29802
33	U.S. ENRICHMENT CORP. PADUCAH	PADUCAH	MC CRACKEN	KY	42001
34	U.S. MARINE CORPS FACILITY	BARSTOW	SAN BERNADINO	CA	92311
35	U.S. MARINE CORPS FACILITY	CHERRY POINT	CRAVEN	NC	28533
36	U.S. MARINE CORPS LOGISTICS FACILITY	ALBANY	DOUGHERTY	GA	31704
37	U.S. NAVY PUGET SOUND FACILITY	BREMERTON	KITSAP	WA	98314
38	U.S. NAVY FACILITY	JACKSONVILLE	DUVAL	FL	32212
39	U.S. NAVY FACILITY	NORFOLK	NORFOLK CITY	VA	23511
40	U.S. NAVY FACILITY	PEARL HARBOR	HONOLULU	HI	96860
41	U.S. NAVY FACILITY	PENSACOLA	ESCAMBIA	FL	32508
42	U.S. NAVY FACILITY	PORTSMOUTH	PORTSMOUTH	VA	23709
43	U.S. NAVY KEYPORT FACILITY	KEYPORT	KITSAP	WA	98345
44	U.S. TVA ENVIRONMENTAL FACILITY	MUSCLE SHOALS	COLBERT	AL	35662

GIS MAP CATEGORIZATION

June 1997

Facilities	Compliance Indicators	Toxicity Ranking	Demographic Rating	Overall Rating of Sites
U.S. Army Anniston, AL	2	15	H	A
NASA Marshall Space Facility, AL	0	24	H	B
U.S. TVA Environmental, AL	0	18	H	B
U.S. Army Pine Bluff Arsenal, AR	1	28	H	A*
U.S. Air Force Plant 44, AZ	0	2	H	B
U.S. DOE Naval Petroleum, CA	1	40	M	B
U.S. Air Force McClellan, CA	2	23	M	A
U.S. Marine Corps Barstow, CA	1	5	H	B
U.S. Air Force Flight Test, CA	0	13	M	B
U.S. DOE Energy Technology, CA	1	8	L	B
U.S. DOE Rocky Flats, CO	2	21	L	B
Bolling Air Force Base, DC	1	0	H	B
U.S. Navy Jacksonville, FL	3	30	M	A
U.S. Navy Pensacola, FL	3	51	M	A*
U.S. Air Force Plant 06, GA	1	37	M	B
U.S. Marine Corps Logistics, GA	1	12	H	B
U.S. Army Fort Benning, GA	1	0	H	B
U.S. Navy Pearl Harbor, HI	1	49	M	B
U.S. DOE Idaho National Lab, ID	1	7	M	B
U.S. Army Fort Riley, KS	2	39	H	A
U.S. Enrichment Corp. Paducah, KY	1	33	H	B
U.S. Army Lake City, MO	1	31	L	B
U.S. Army HQ USAEC, MO	1	32	H	B
U.S. Marine Corps Cherry Point, NC	2	6	H	A
U.S. DOE Sandia National Lab, NM	0	22	H	A*
U.S. Army Watervliet Arsenal, NY	1	9	L	C
U.S. Air Force Plant 59, NY	0	47	L	C
Wright-Patterson Air Force Base, OH	0	1	M	B
U.S. Army Lima, OH	0	45	L	C
Tinker Air Force Base, OK	1	3	M	B
U.S. Army Letterkenny, PA	2	20	L	B
U.S. Defense Logistics Agency, RI	0	90	L	C
U.S. DOE Savannah River Site, SC	2	4	H	A*

H= Most Likely to be an EJ Site

M= Likely to be an EJ Site

L= Unlikely to be an EJ Site

*Reported EJ Concerns

GIS MAP CATEGORIZATION

June 1997

Facilities	Compliance Indicators	Toxicity Ranking	Demographic Rating	Overall Rating of Sites
U.S. Army Kingsport, TN	1	29	H	B
U.S. DOE Oak Ridge Y-12 Plant, TN	1	35	M	B
Kelly Air Force Base, TX	0	11	H	A*
U.S. Air Force Plant 04, TX	1	14	M	B
U.S. Army Fort Hood, TX	1	44	H	B
U.S. Army Longhorn Ammunition, TX	2	0	H	B
U.S. Air Force Ogden Facility, UT	1	16	L	C
U.S. Navy Portsmouth, VA	0	19	H	B
U.S. Navy Norfolk, VA	1	41	H	B
U.S. Navy Puget Sound, WA	2	38	L	B
U.S. Navy Keyport Naval, WA	0	10	L	C

Page 31

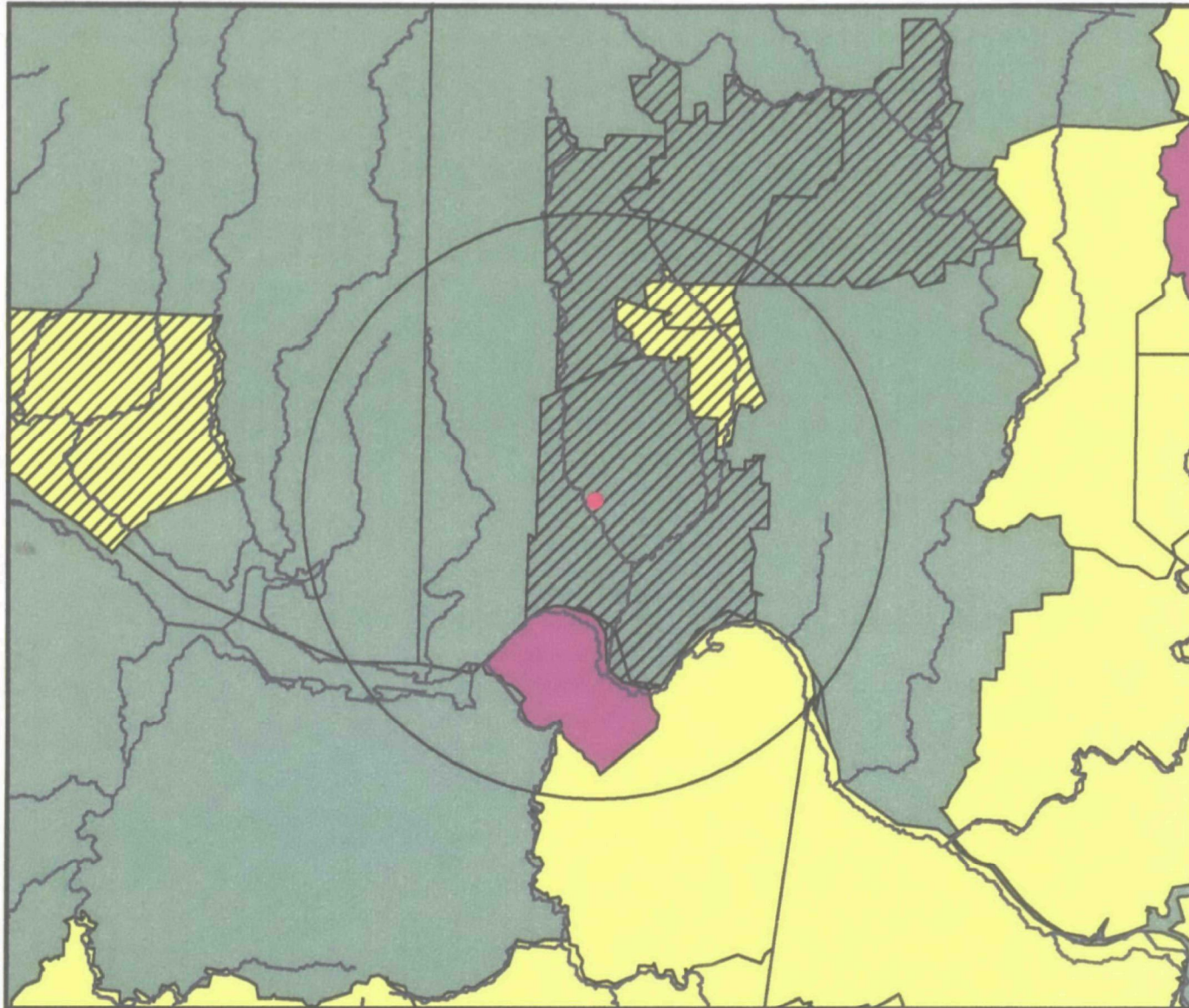
H= Most Likely to be an EJ Site

M= Likely to be an EJ Site

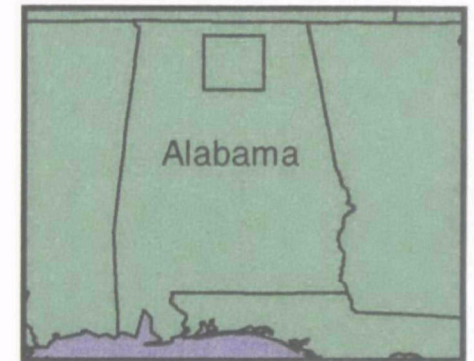
L= Unlikely to be an EJ Site

*Reported EJ Concerns

Low Income, Poverty Level, and Minorities Surrounding NASA Marshall Space Flight Facility, Huntsville Madison County, Alabama



Enlarged Area



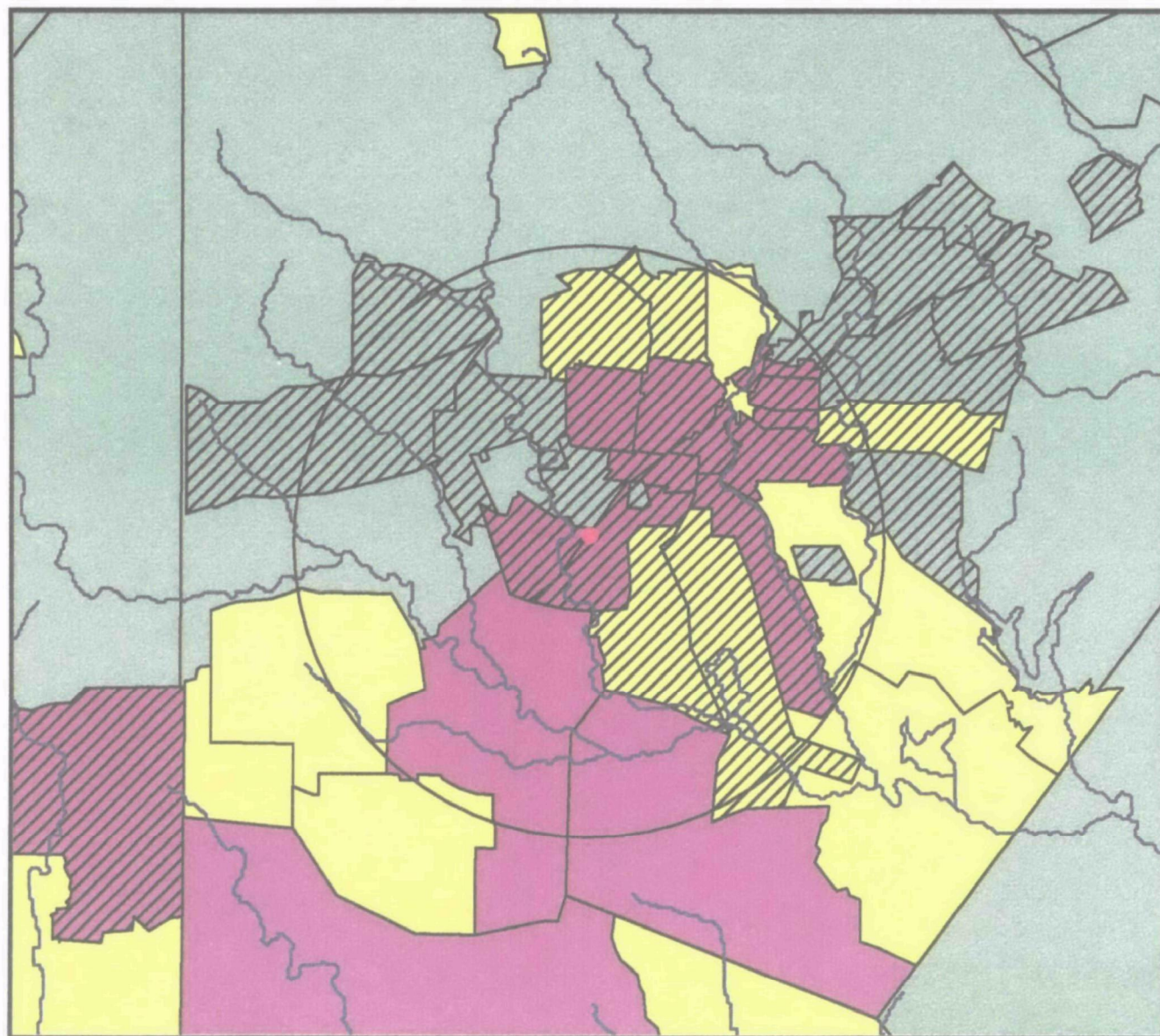
Legend

- Federal Facilities
- Zip Codes with :
 - ▨ >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- ▭ County Boundary
- ▭ Stream Reaches
- 10 Mile Radius from Facility

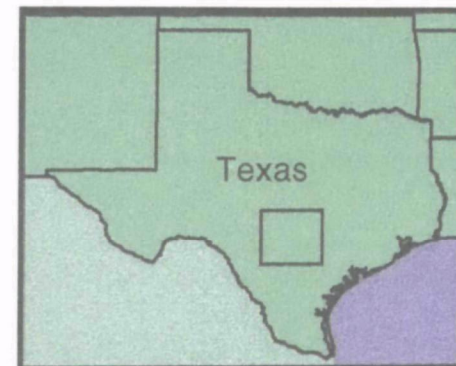
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Low Income, Poverty Level, and Minorities Surrounding U.S. Air Force Facility, Kelly AFB

Bexar County, Texas



Enlarged Area

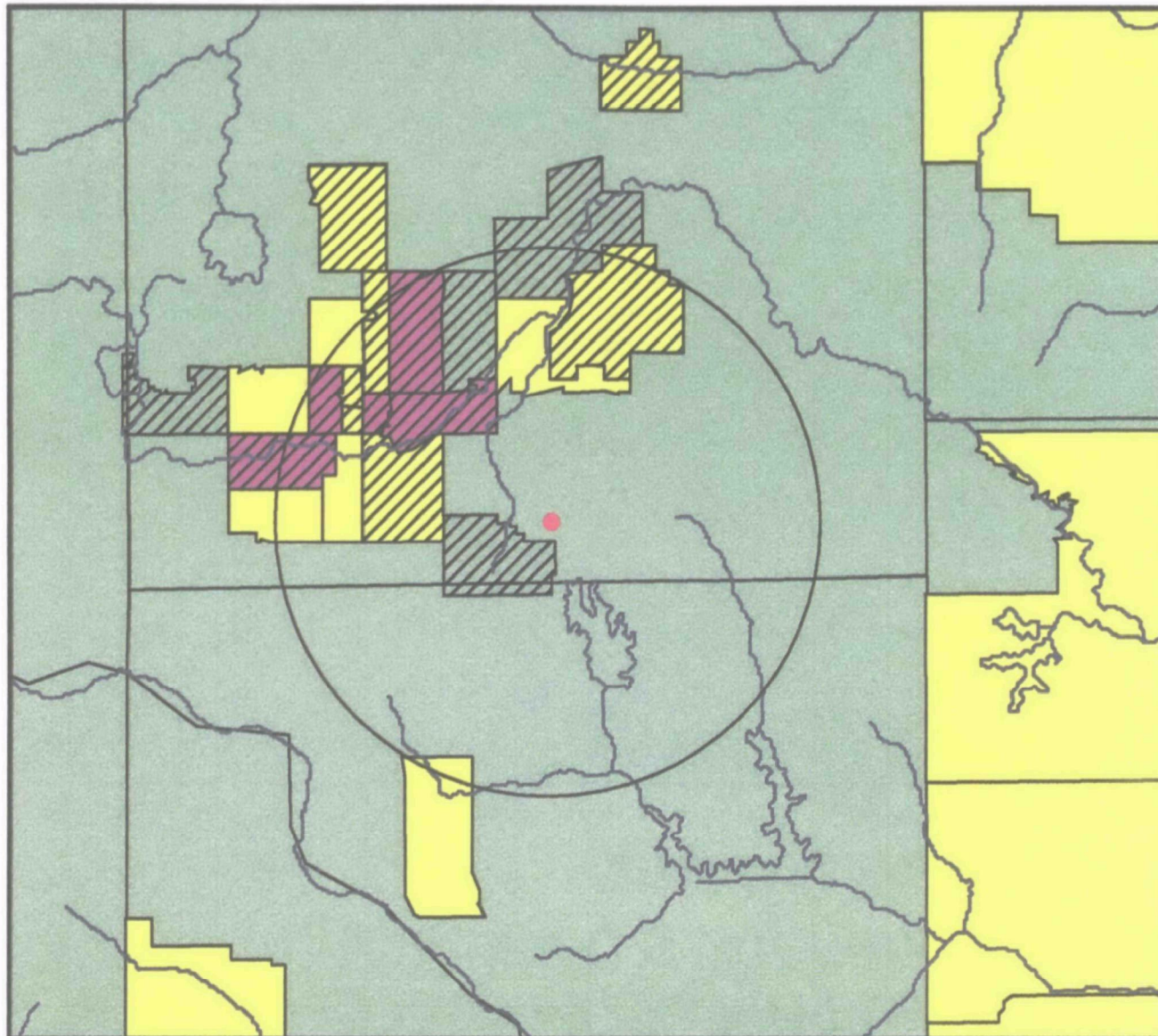


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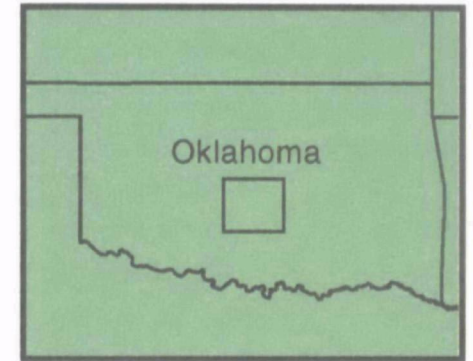
- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches / Shore Lines
- 10 Mile Radius from Facility



Low Income, Poverty Level, and Minorities Surrounding U.S. Air Force Facility, Tinker AFB Oklahoma County, Oklahoma



Enlarged Area



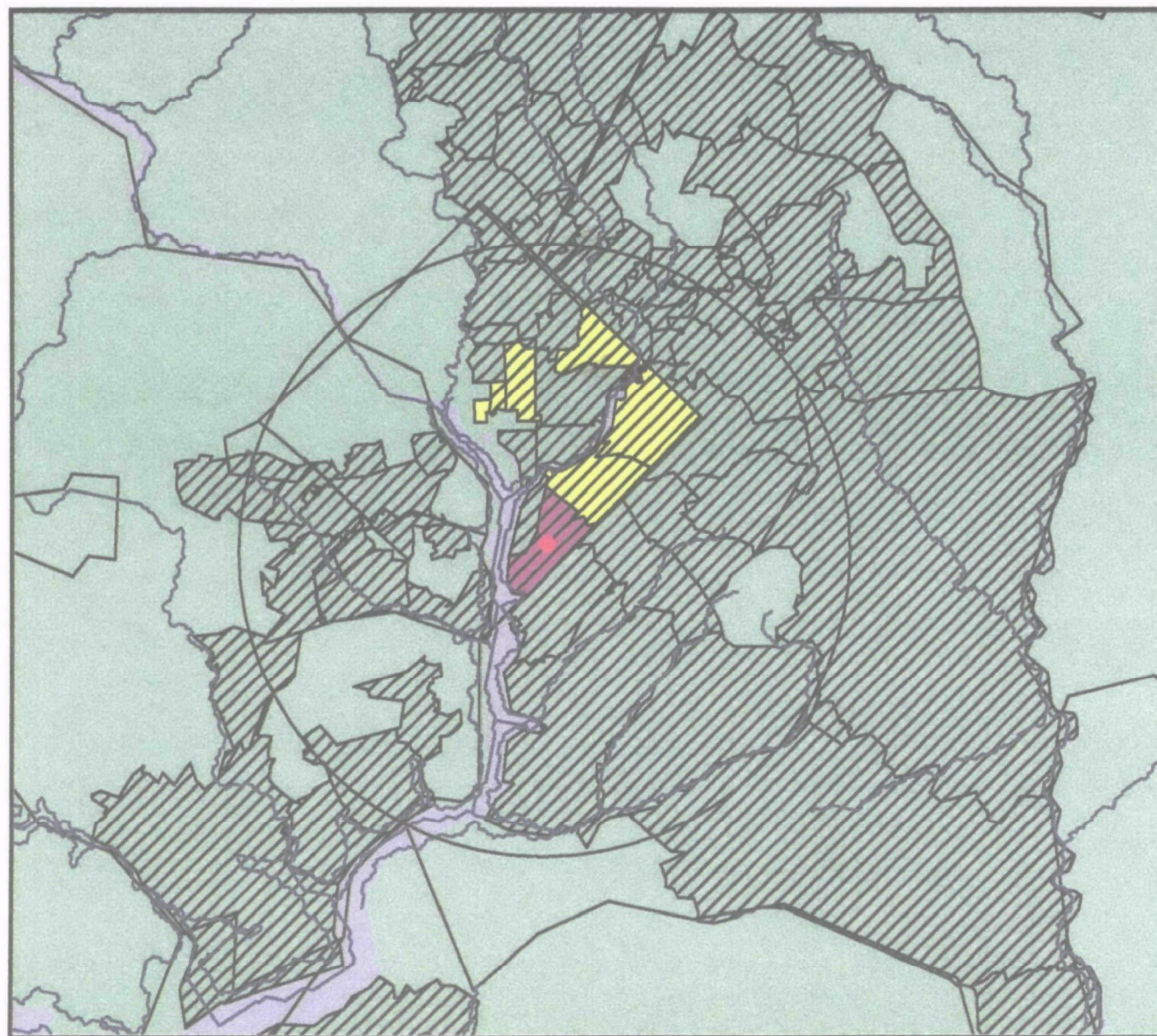
Legend

- Federal Facilities
- Zip Codes with :
- >25% Minority
- >25% of Families Below Poverty Level
- >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

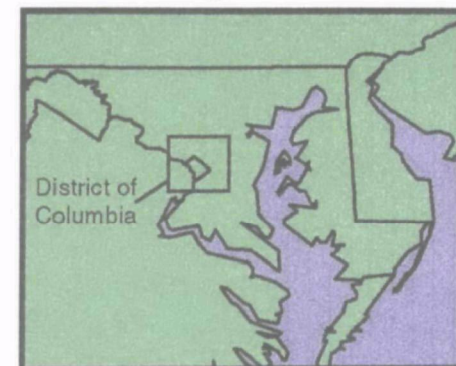
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Low Income, Poverty Level, and Minorities Surrounding U.S. Air Force Facility, Washington D.C.

District of Columbia



Enlarged Area

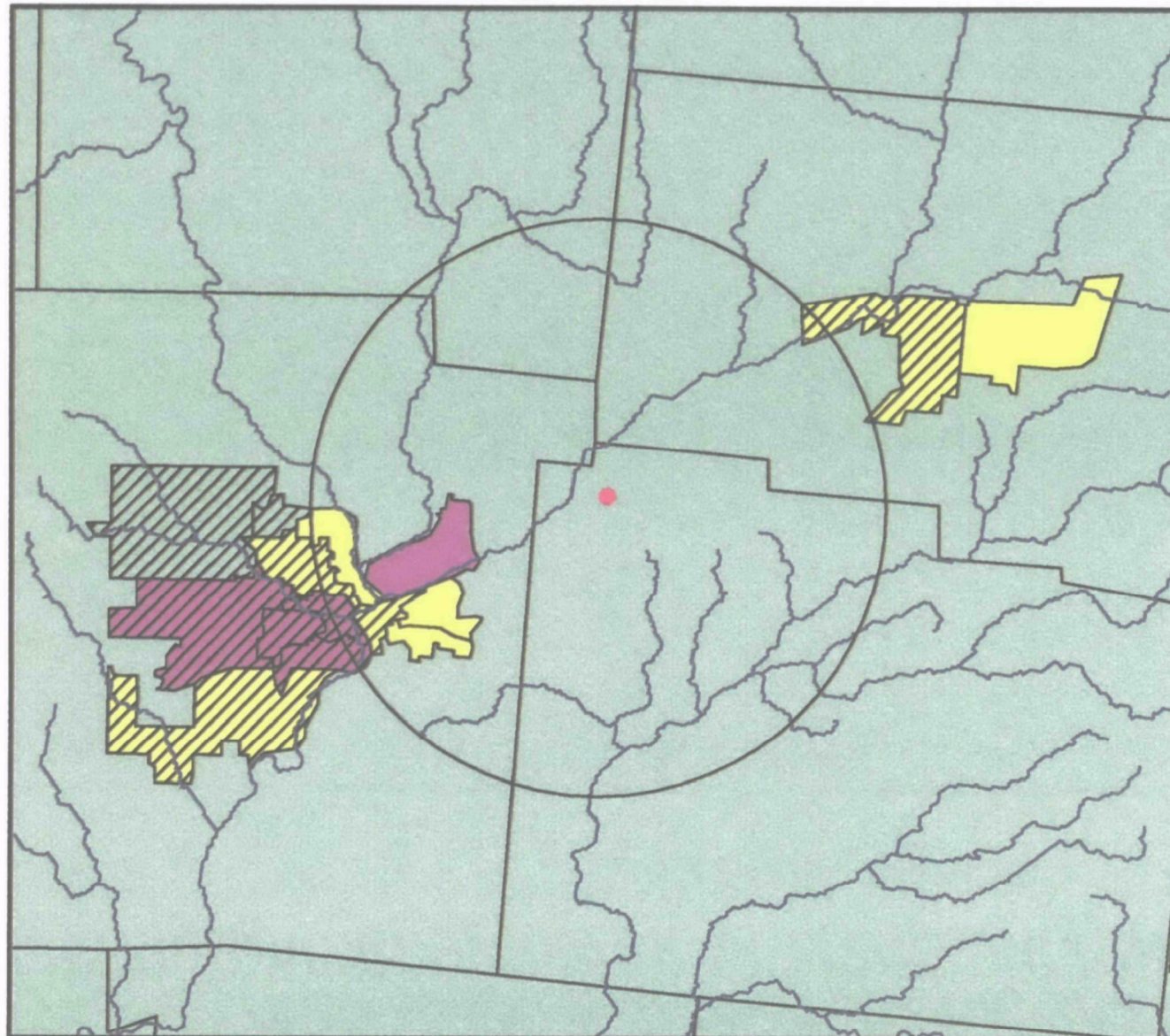


Legend

- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Air Force Facility, Wright-Patterson Greene County, Ohio



Enlarged Area

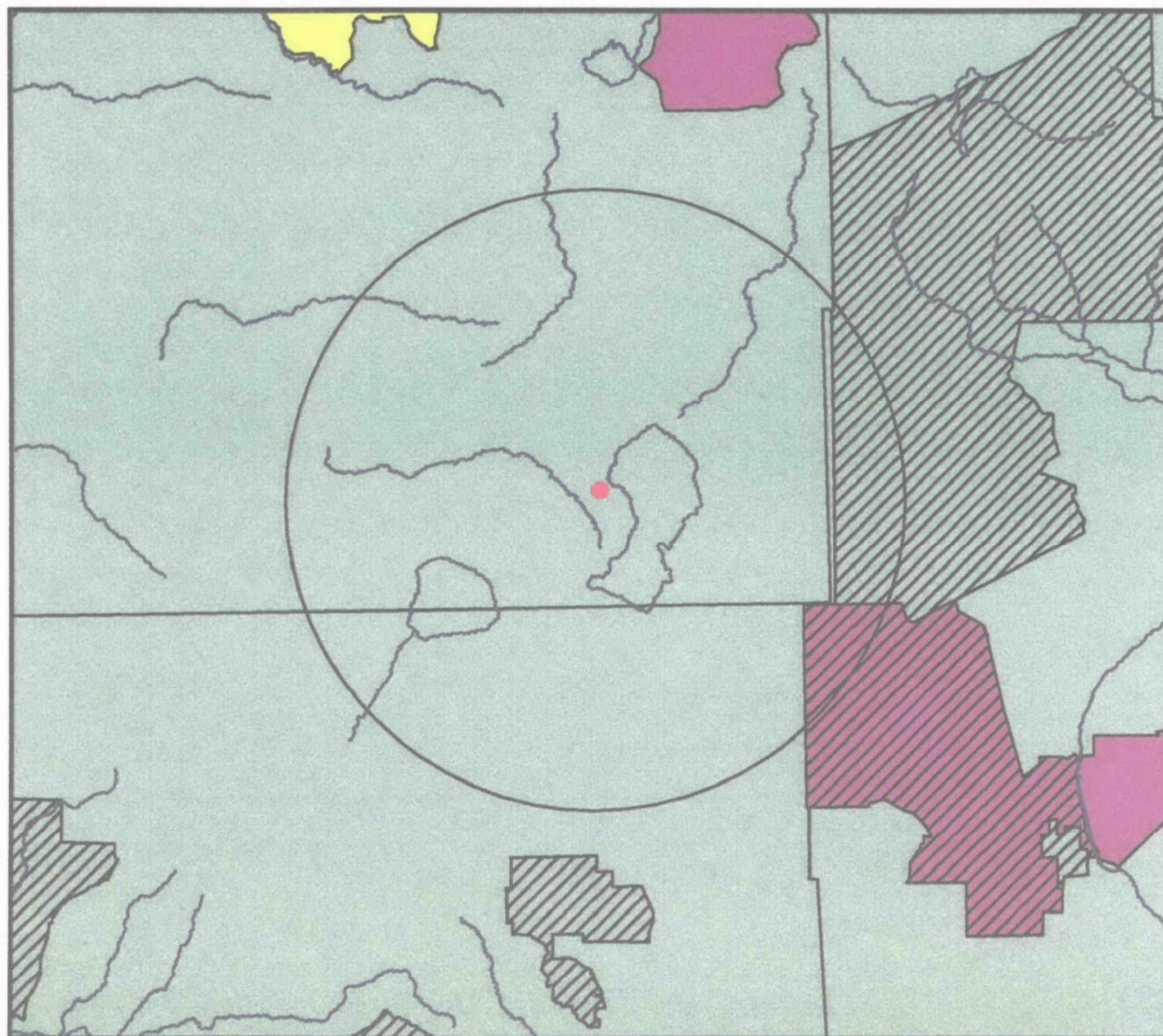


Legend

- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Air Force Flight Testing Center, Edwards Kern County, California



Enlarged Area

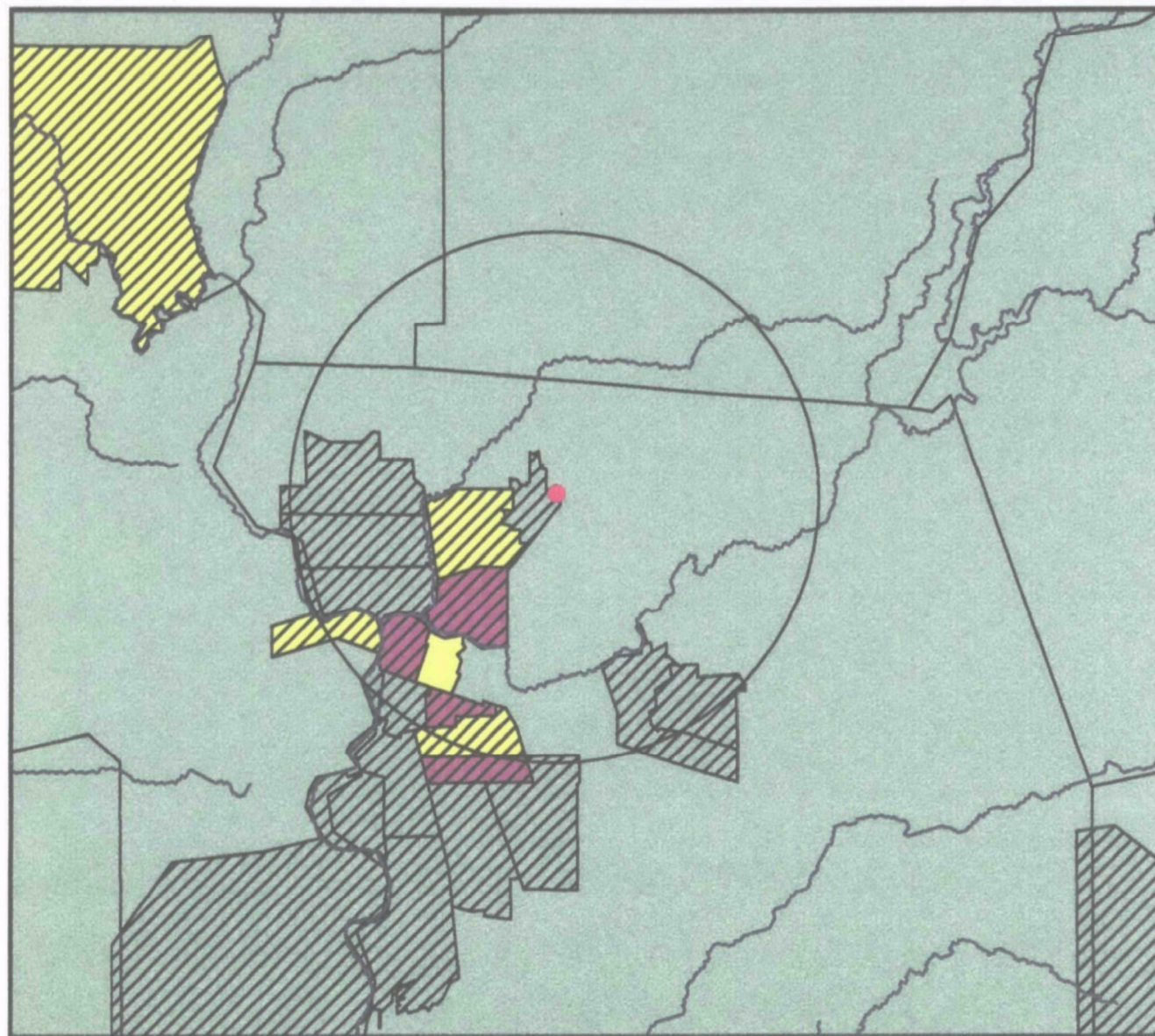


Legend

- Federal Facilities
- Zip Codes with :
- >25% Minority
- >25% of Families Below Poverty Level
- >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 20 Mile Radius from Facility

0 10 20 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Air Force McClellan AFB, Sacramento Sacramento County, California



Enlarged Area



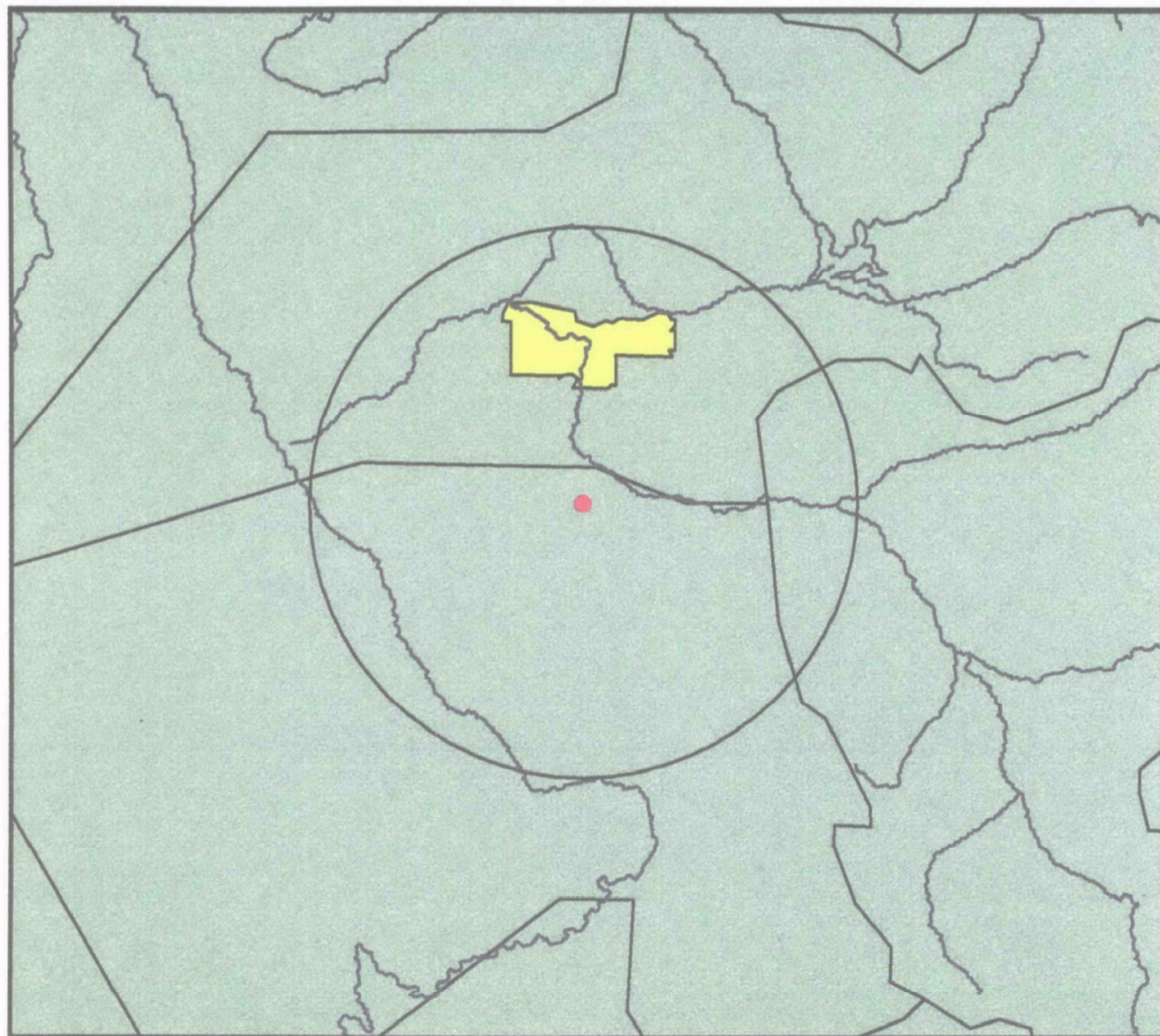
Legend

- Federal Facilities
- Zip Codes with :
- >25% Minority
- >25% of Families Below Poverty Level
- >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

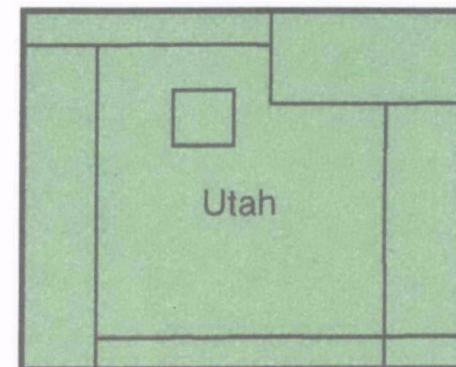
0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Air Force Ogden AFB, Hill

Tooele County, Utah



Enlarged Area



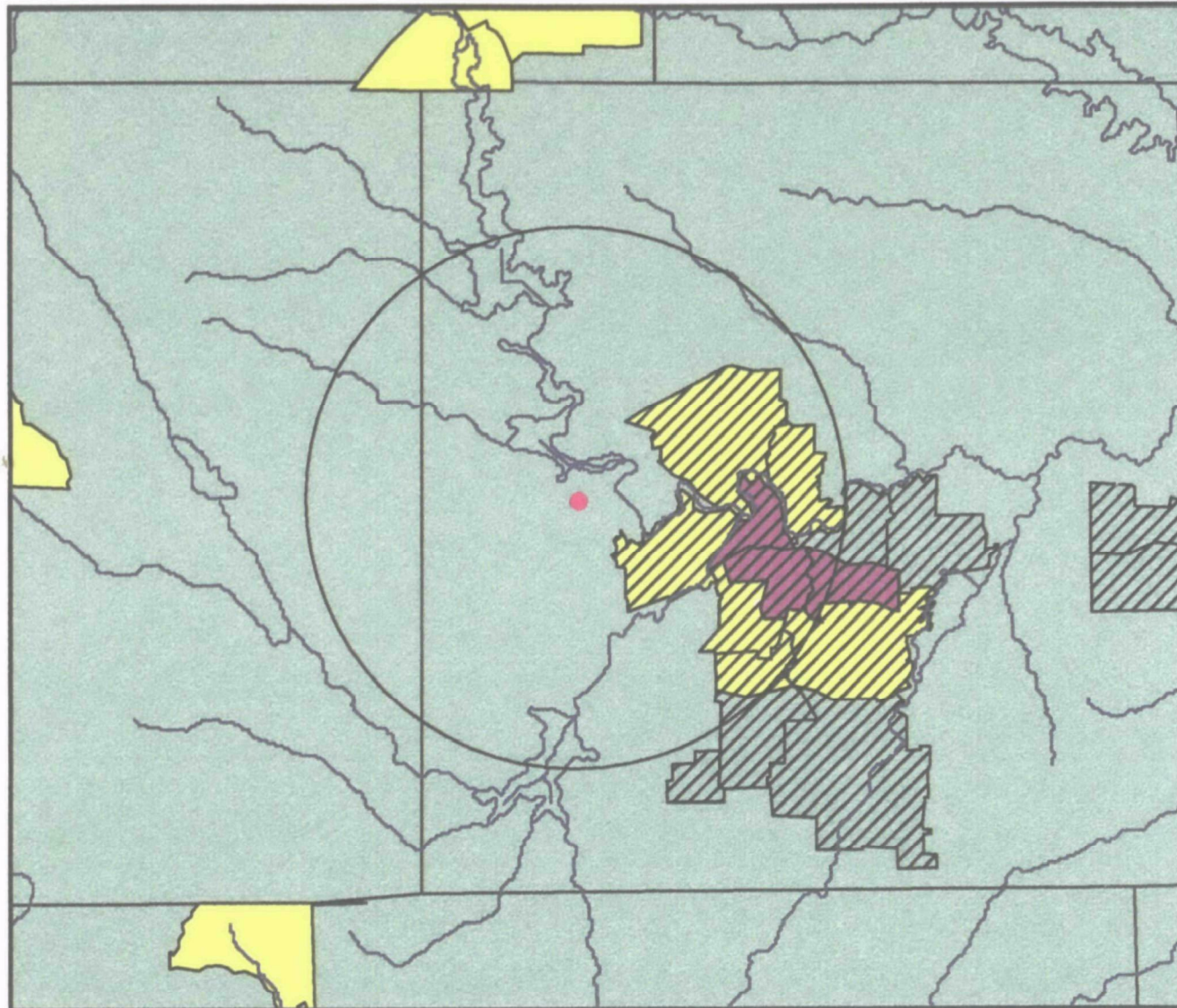
Legend

- Federal Facilities
- Zip Codes with :
 - ▨ >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- ▭ County Boundary
- ▭ Stream Reaches
- 10 Mile Radius from Facility



Low Income, Poverty Level, and Minorities Surrounding U.S. Air Force Plant 04, Fort Worth

Tarrant County, Texas



Enlarged Area



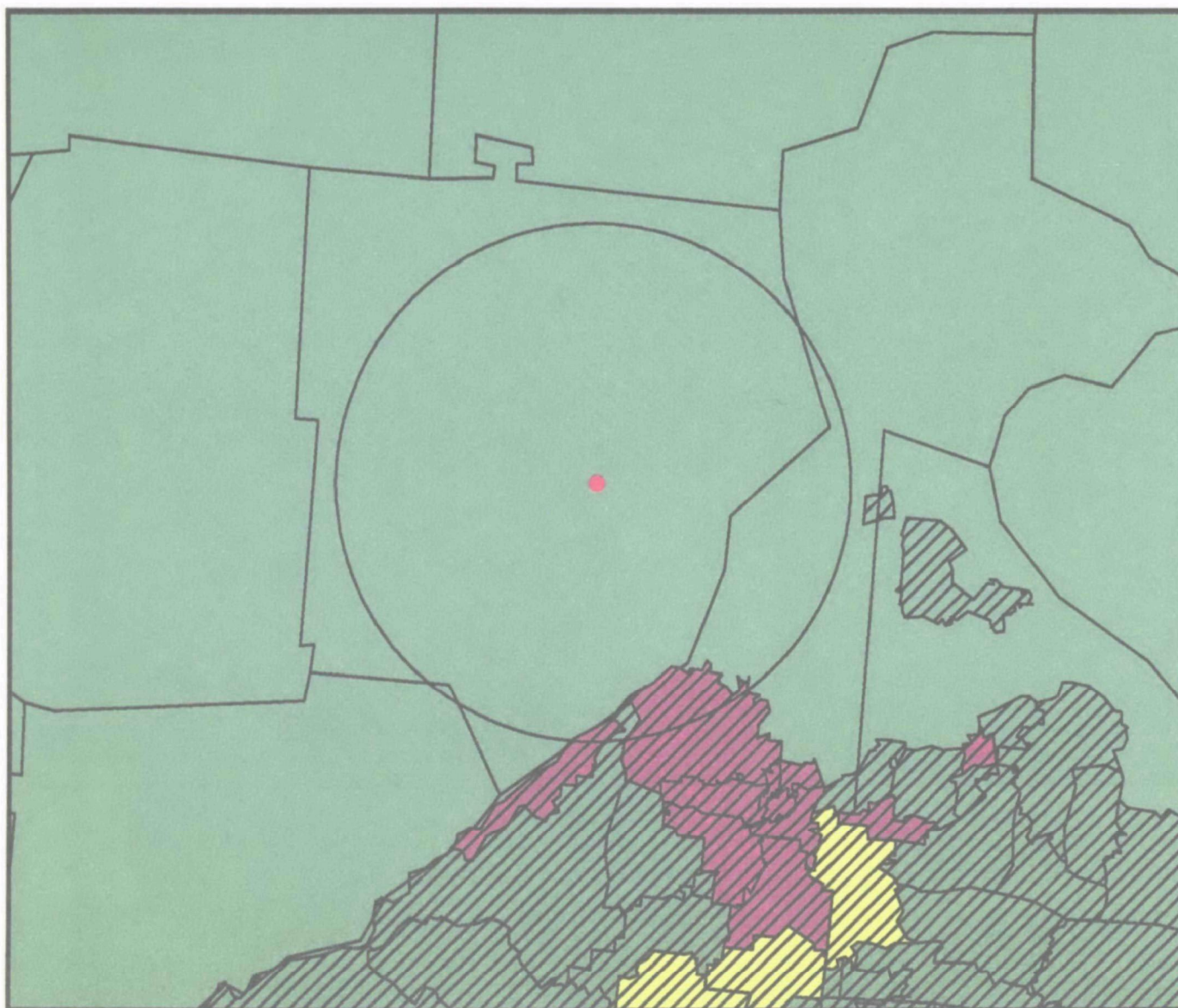
Legend

- Federal Facilities
- Zip Codes with :
- >25% Minority
- >25% of Families Below Poverty Level
- >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Air Force Plant 06, Marietta

Cobb County, Georgia



Enlarged Area



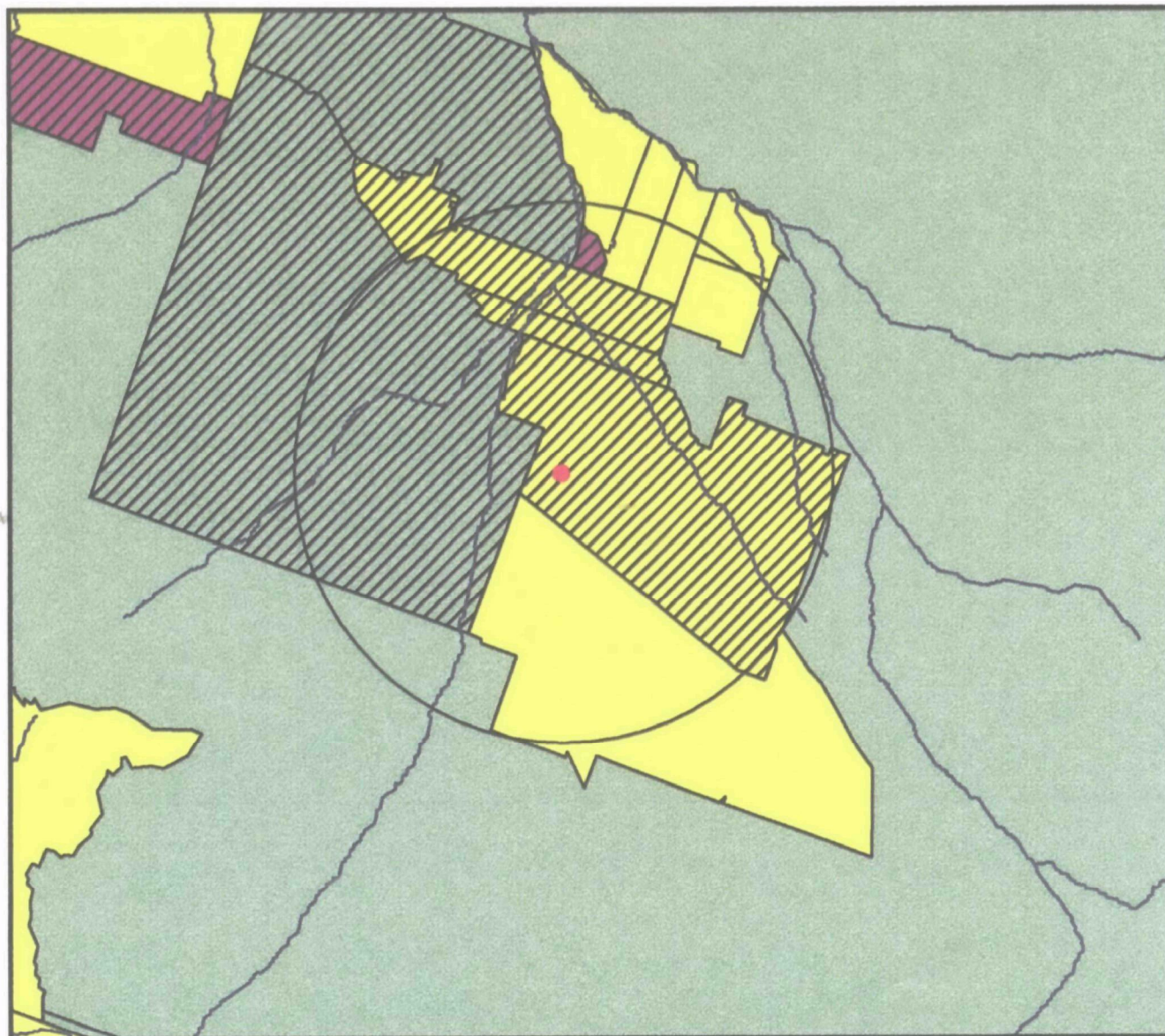
Legend

- Federal Facilities
- Zip Codes with :
- >25% Minority
- >25% of Families Below Poverty Level
- >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Air Force Plant 44, Tucson

County of Pima, Arizona



Enlarged Area



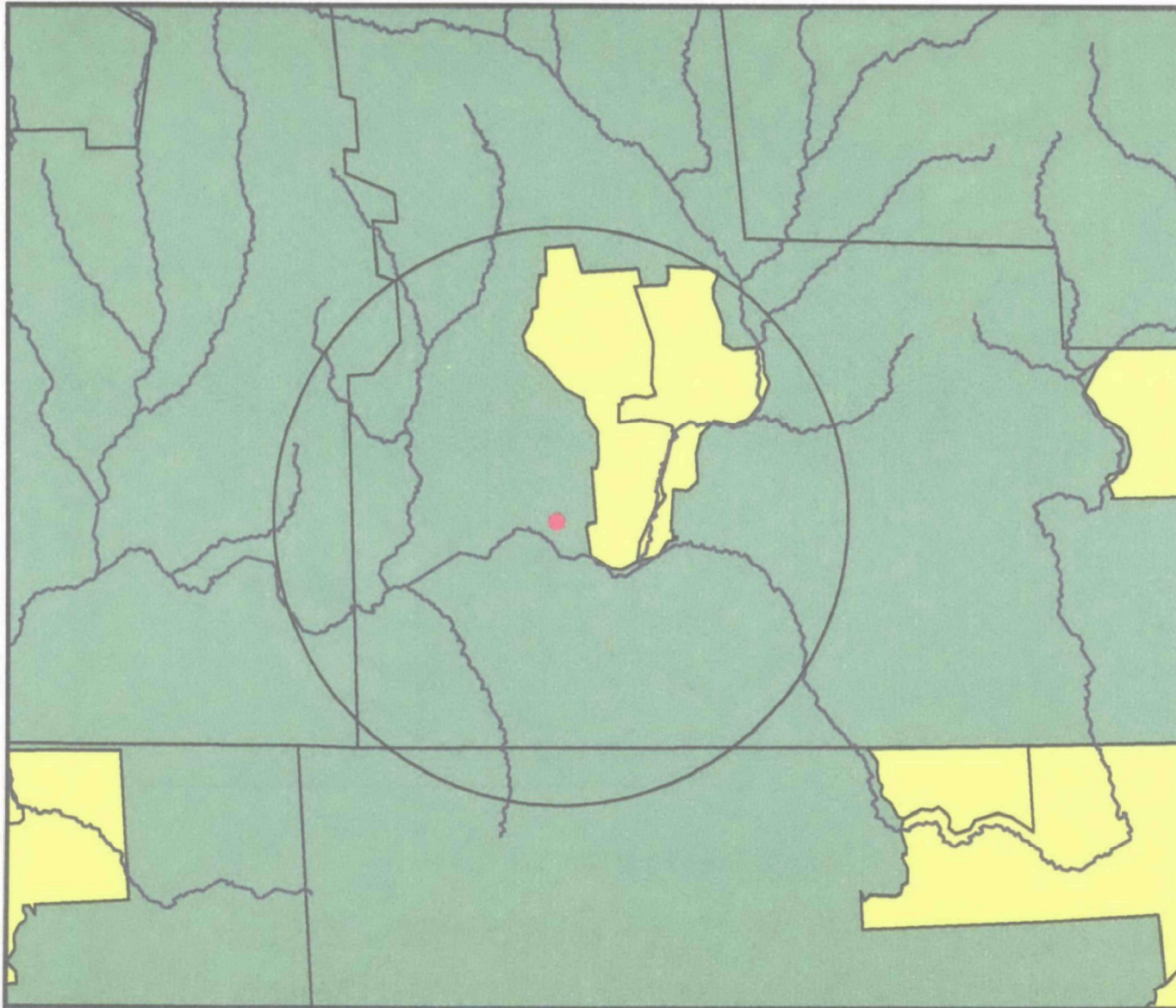
Legend

- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Air Force Plant 59, Johnson City

Broome County, New York



Enlarged Area



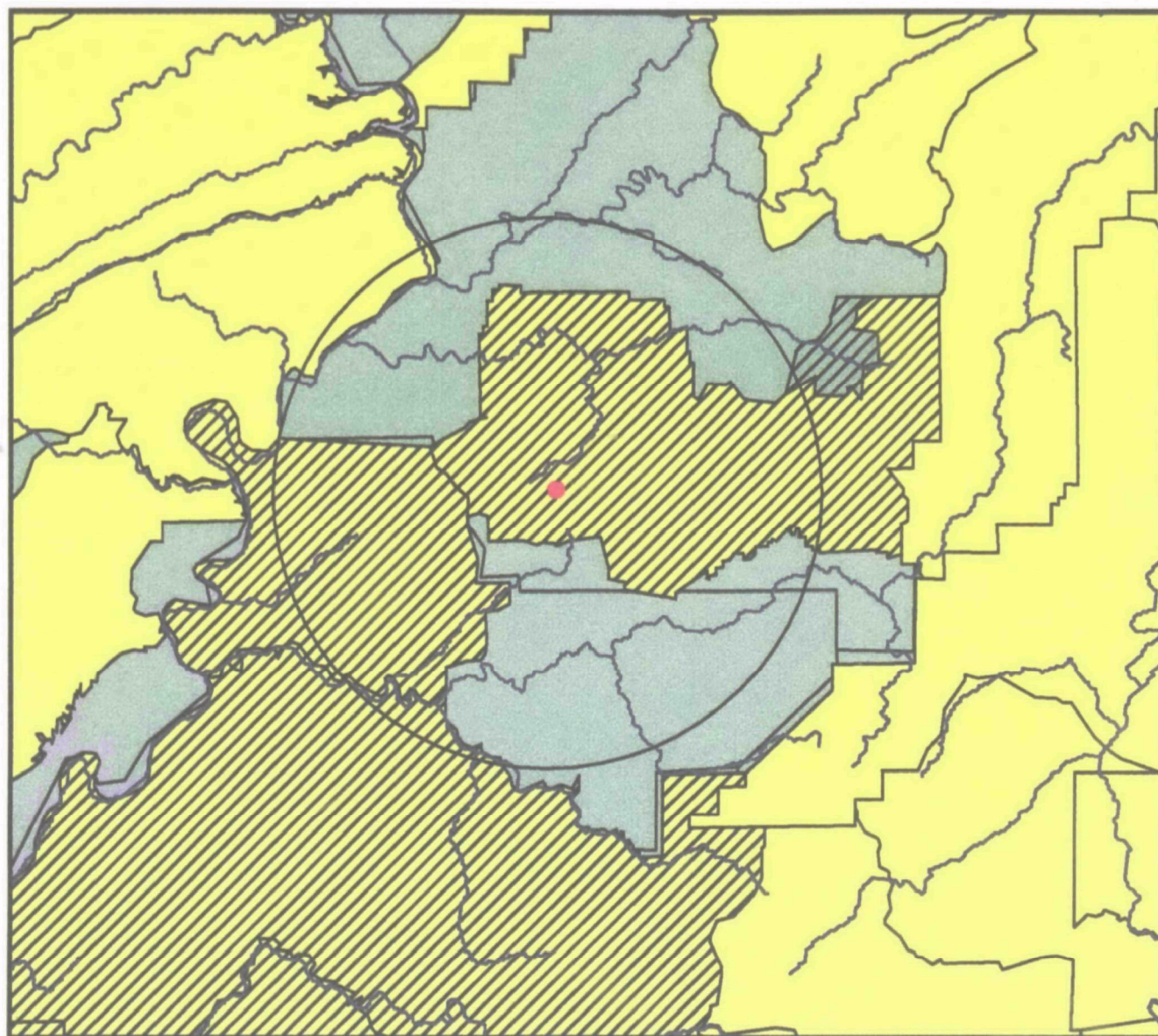
Legend

- Federal Facilities
- Zip Codes with :
 - ▨ >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- ▬ County Boundary
- ▬ Stream Reaches
- 10 Mile Radius from Facility

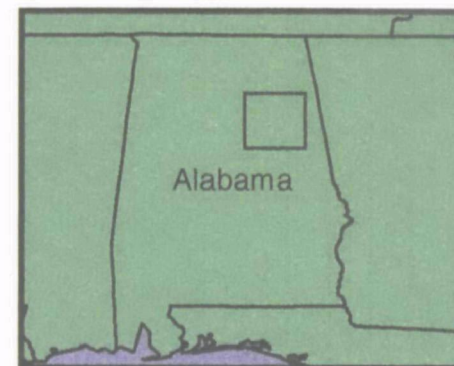
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Low Income, Poverty Level, and Minorities Surrounding U.S. Army Facility, Anniston

Calhoun County, Alabama



Enlarged Area



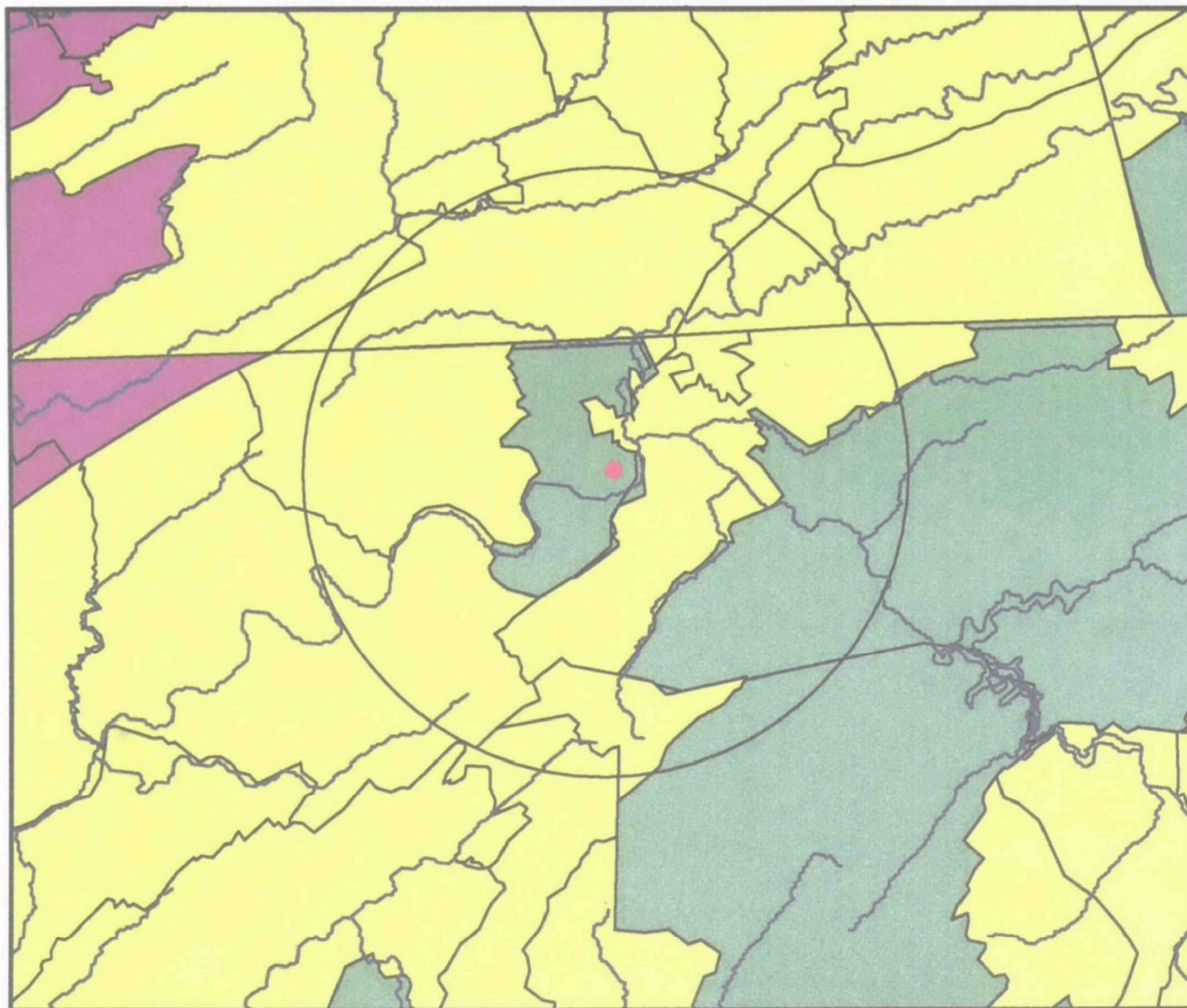
Legend

- Federal Facilities
- Zip Codes with :
- >25% Minority
- >25% of Families Below Poverty Level
- >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Army Facility, Kingsport

Hawkins County, Tennessee



Enlarged Area



Legend

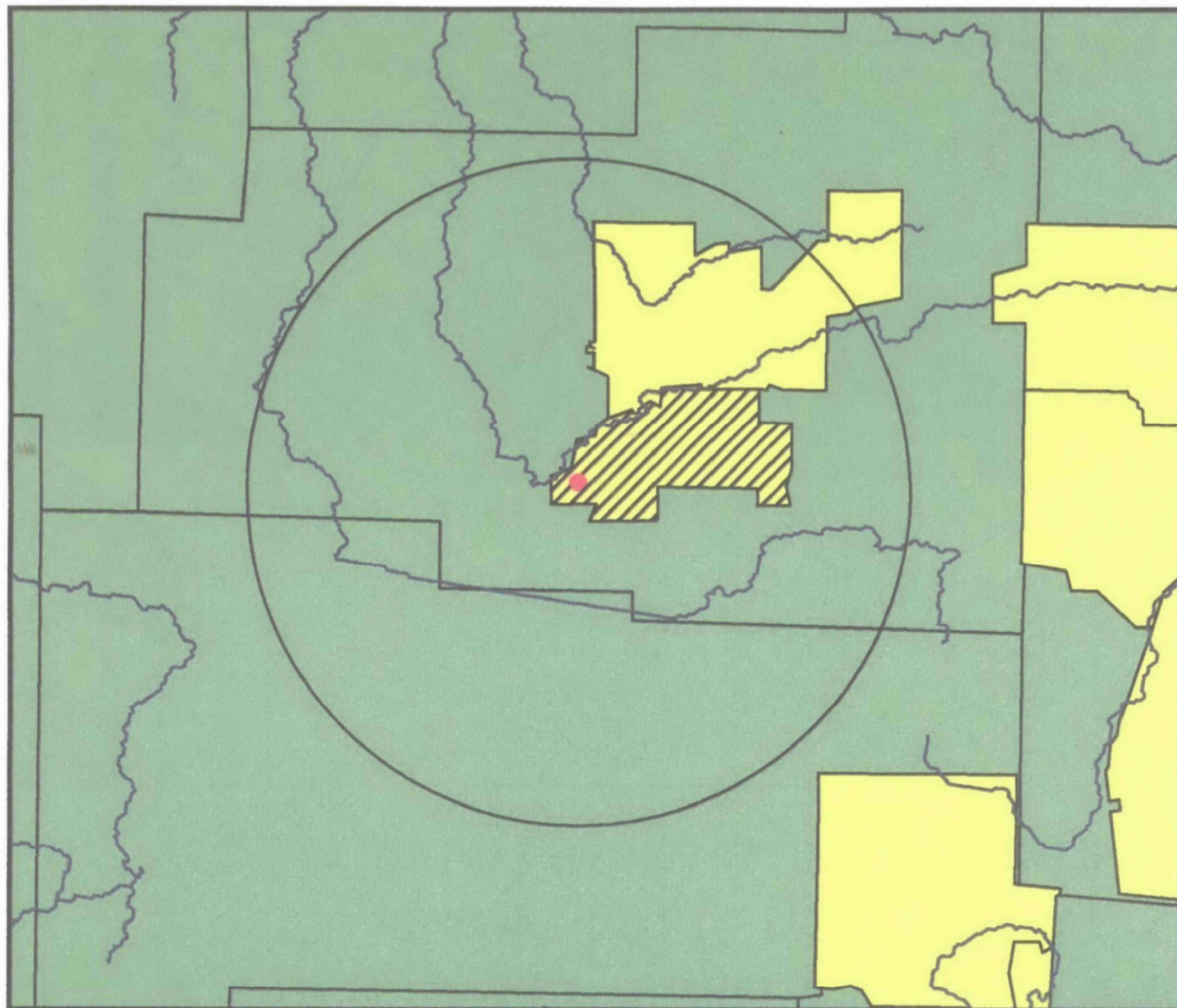
- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Army Facility, Lima

Allen County, Ohio

June 1997



Enlarged Area



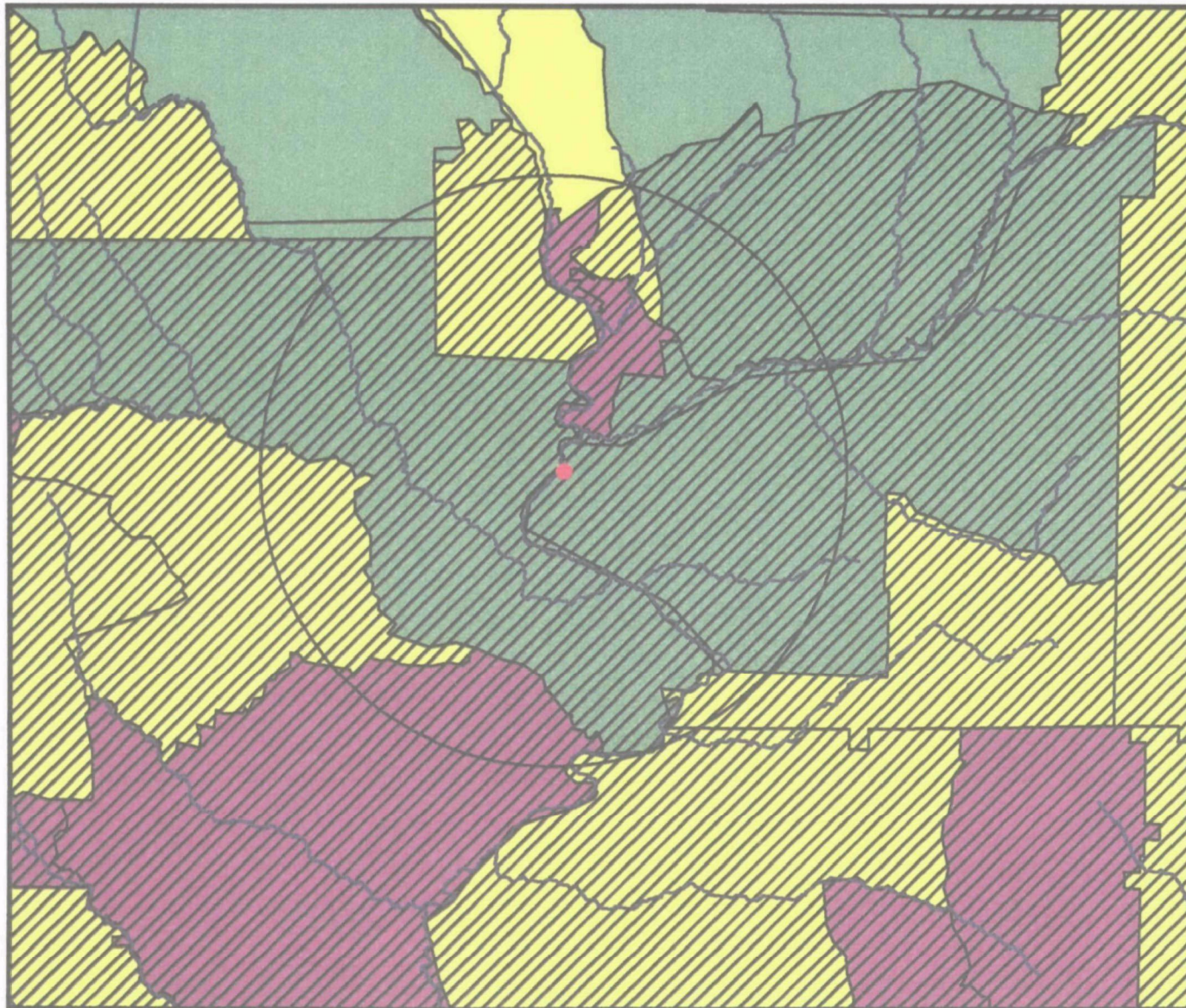
Legend

- Federal Facilities
- Zip Codes with :
- >25% Minority
- >25% of Families Below Poverty Level
- >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Army Fort Benning, Columbus

Muscogee County, Georgia



Enlarged Area



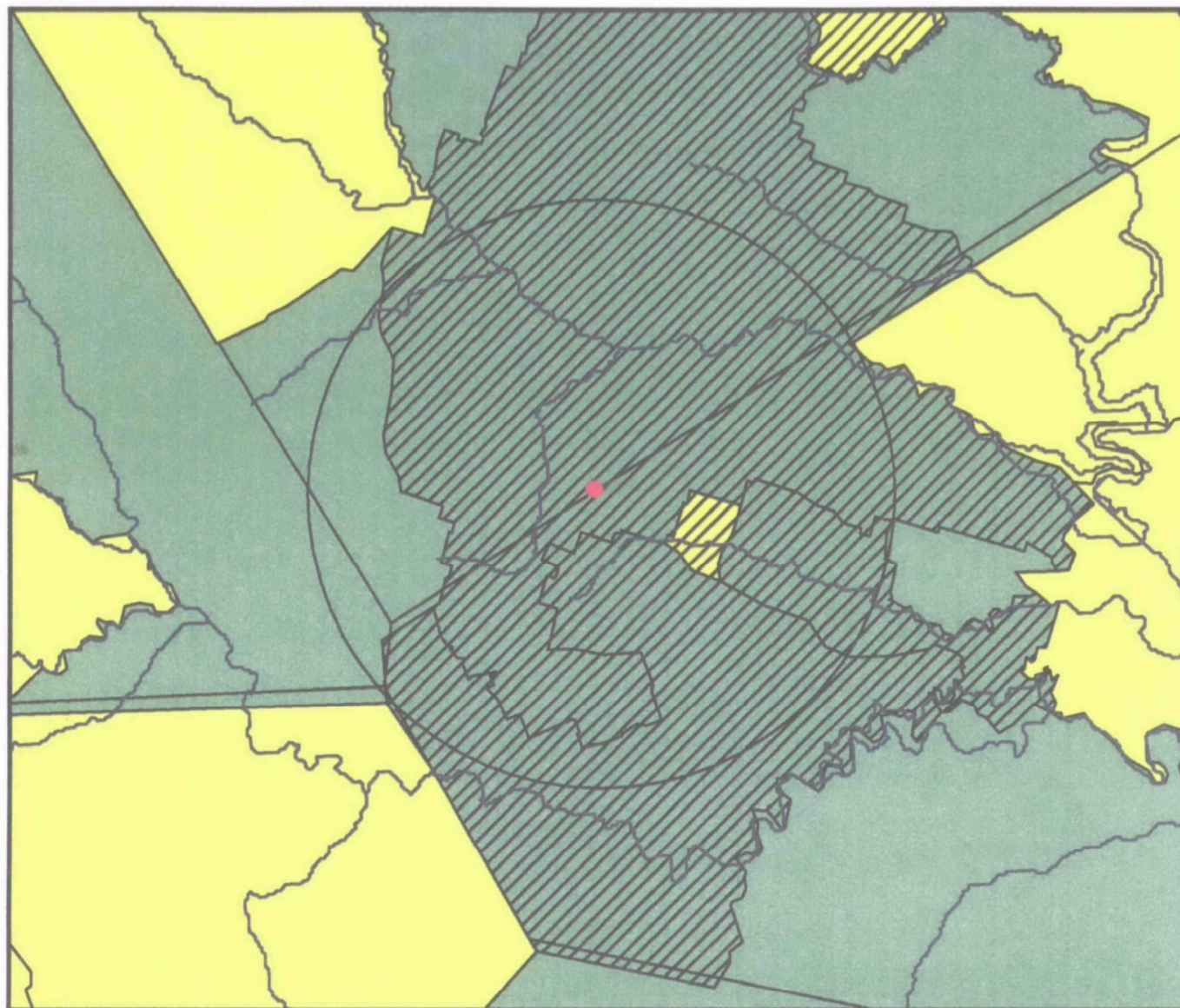
Legend

- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Army Facility, Fort Hood

Bell County, Texas



Enlarged Area



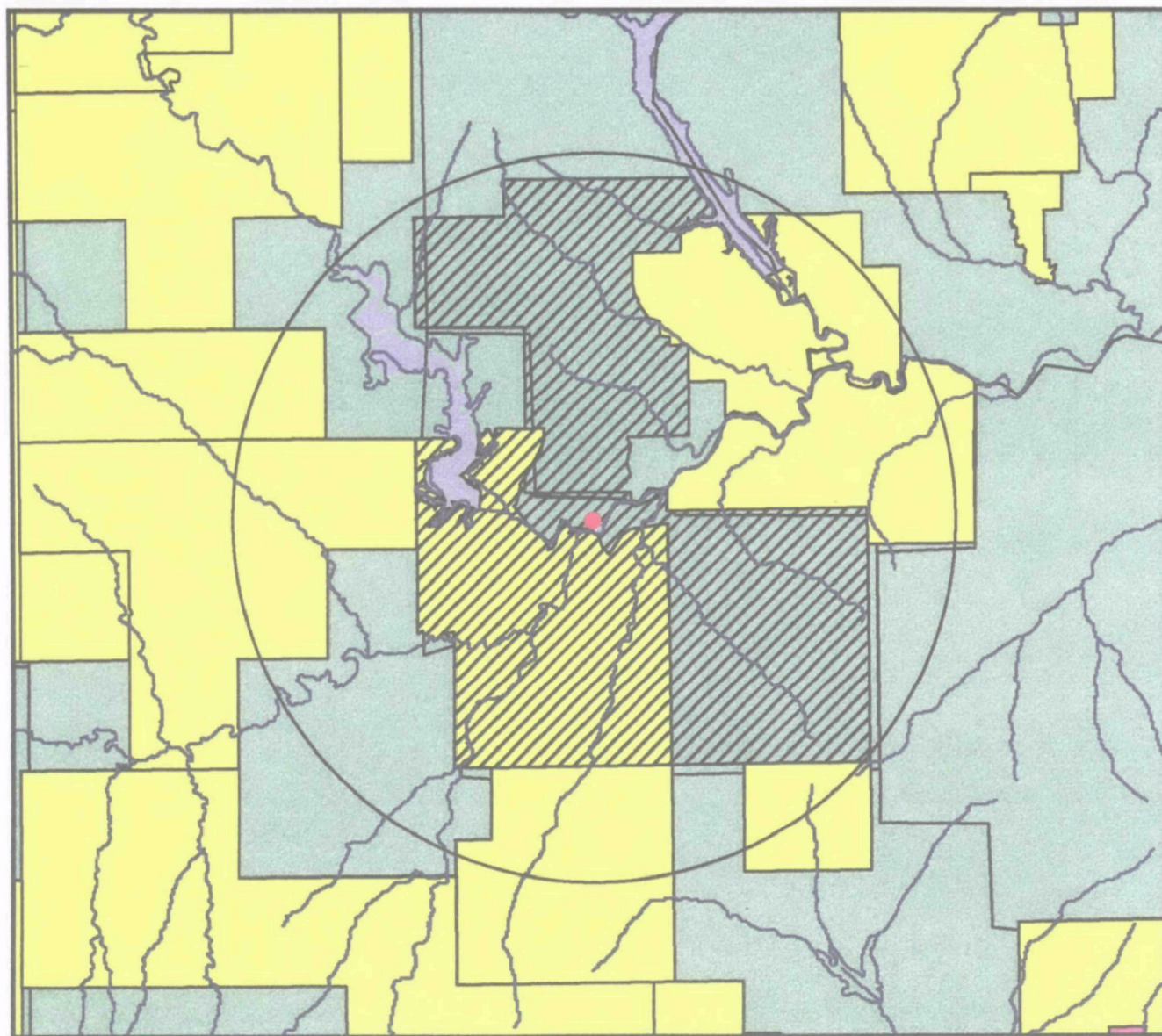
Legend

- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

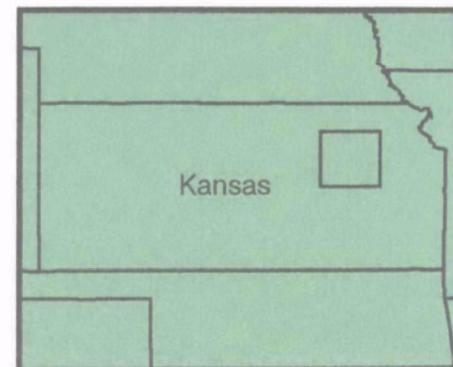


Low Income, Poverty Level, and Minorities Surrounding U.S. Army Facility, Fort Riley

Geary County, Kansas



Enlarged Area

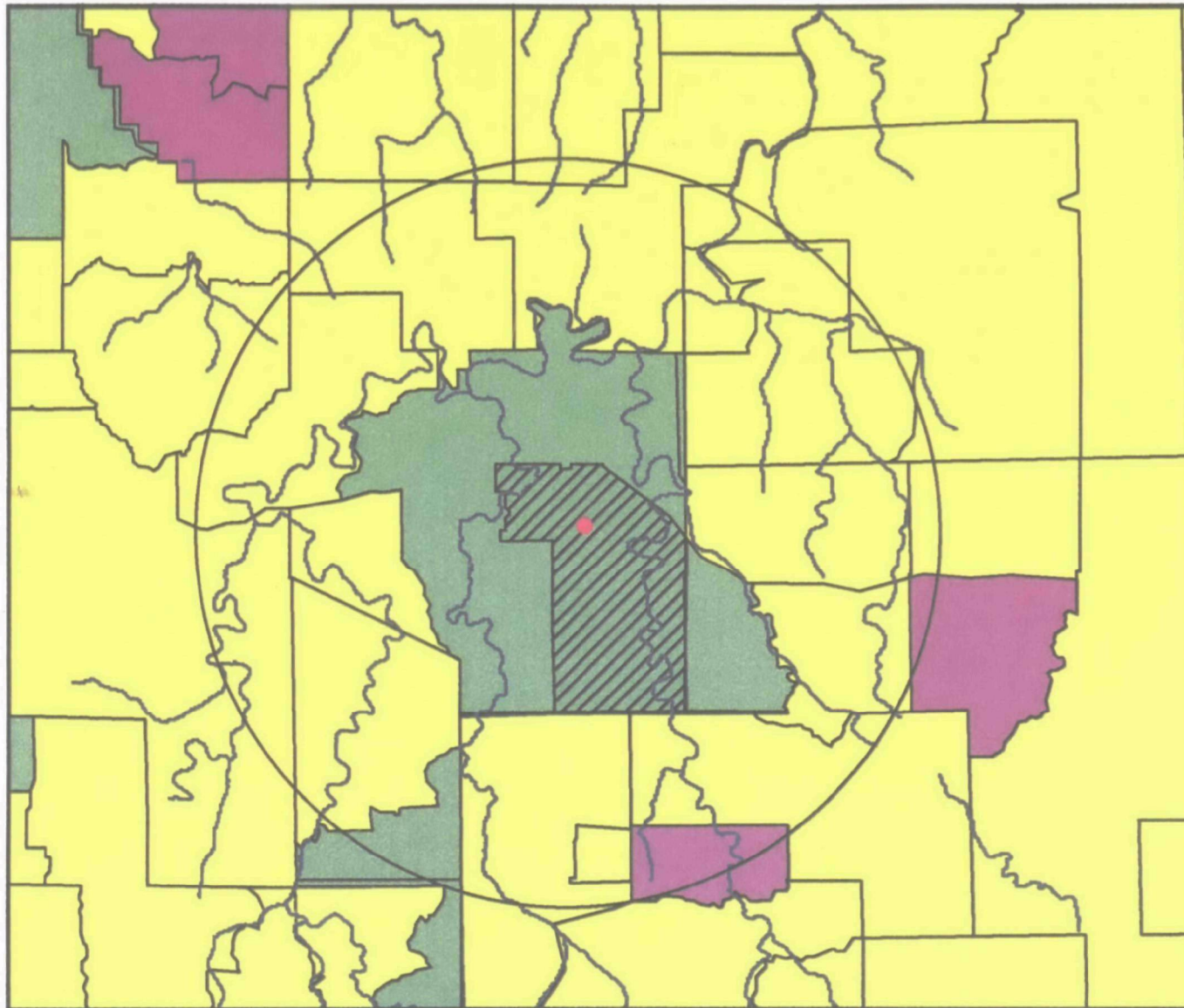


Legend

- Federal Facilities
- Zip Codes with :
 - ▨ >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- ▭ County Boundary
- ▭ Stream Reaches
- 20 Mile Radius from Facility

0 10 20 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Army HQ USAEC, Fort Leonard Wood Pulaski County, Missouri

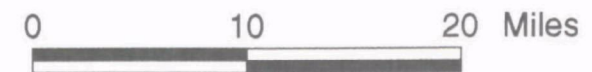


Enlarged Area

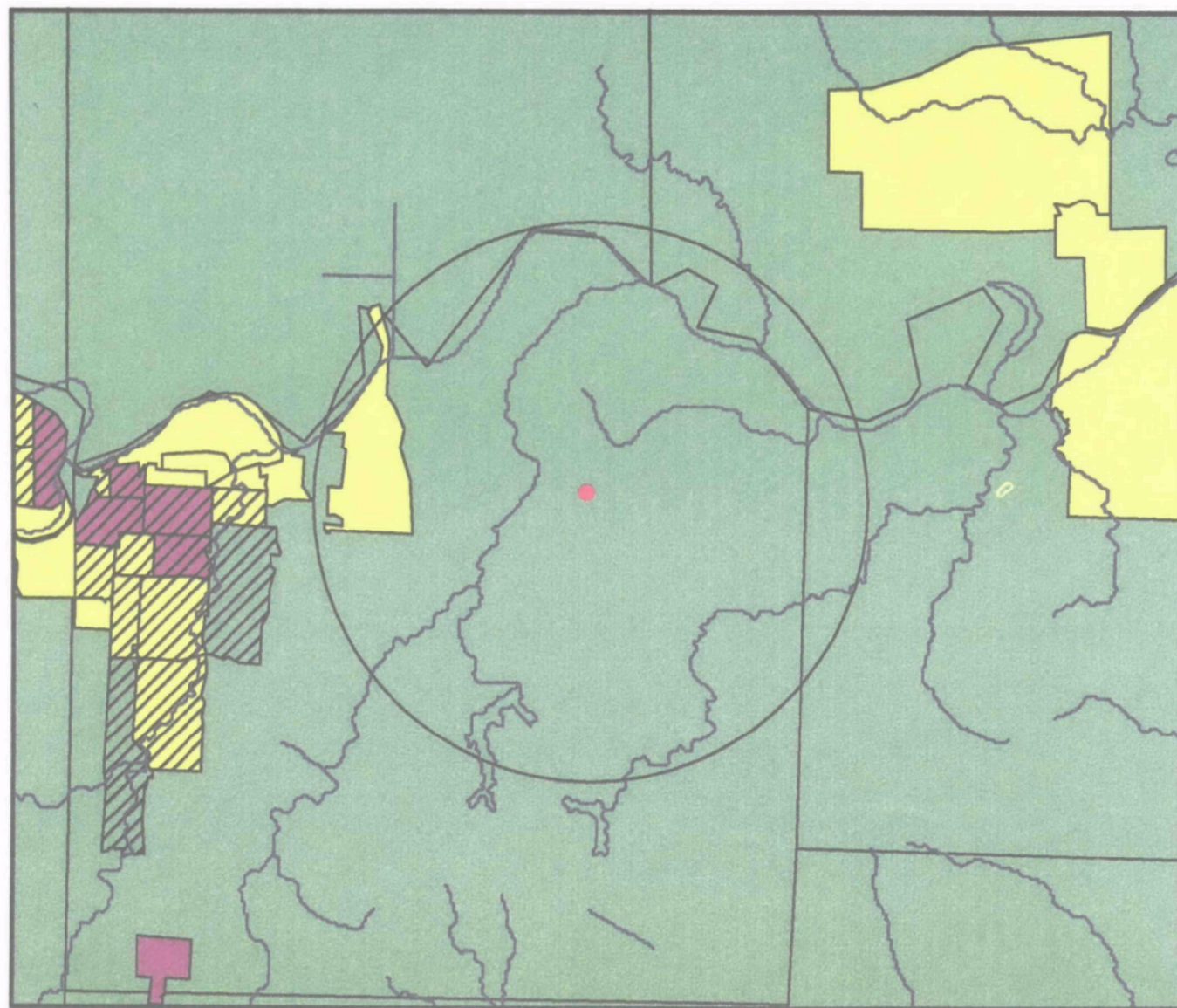


Legend

- Federal Facilities
- Zip Codes with :
 - ▨ >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- ▬ County Boundary
- ▬ Stream Reaches
- 20 Mile Radius from Facility



Low Income, Poverty Level, and Minorities Surrounding U.S. Army Lake City Facility, Independence Jackson County, Missouri



Enlarged Area

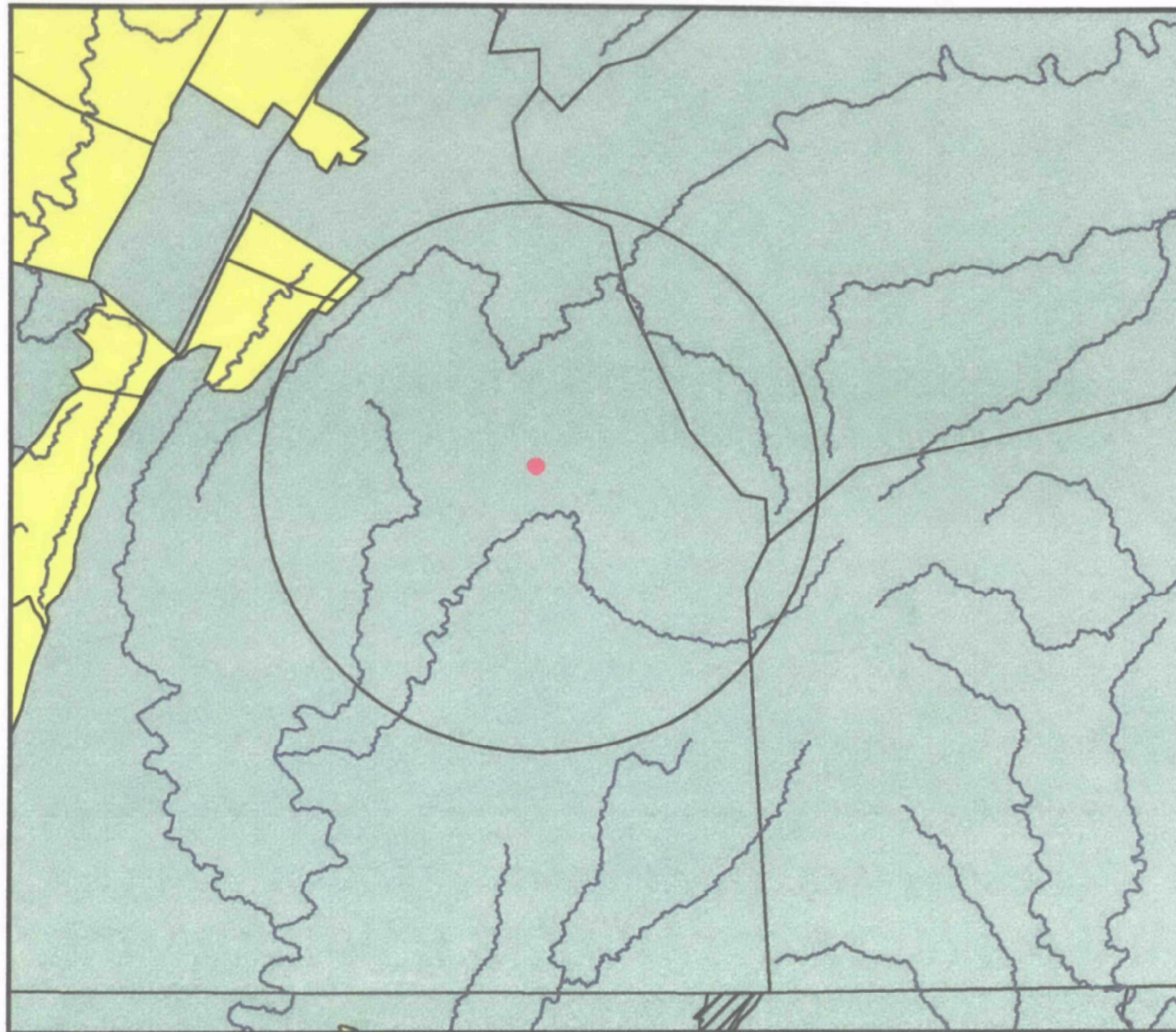


Legend

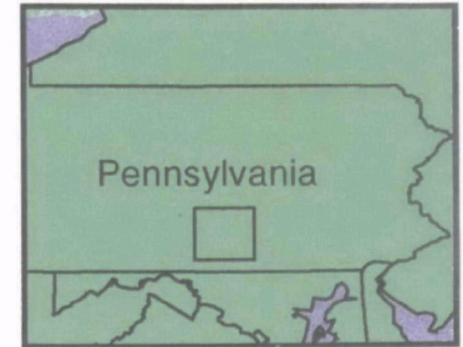
- Federal Facilities
- Zip Codes with :
- ▨ >25% Minority
- >25% of Families Below Poverty Level
- >25% Households Low Income (<\$15,000)
- ▭ County Boundary
- ▭ Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Army Letterkenny Arsenal, Chambersburg Franklin County, Pennsylvania



Enlarged Area



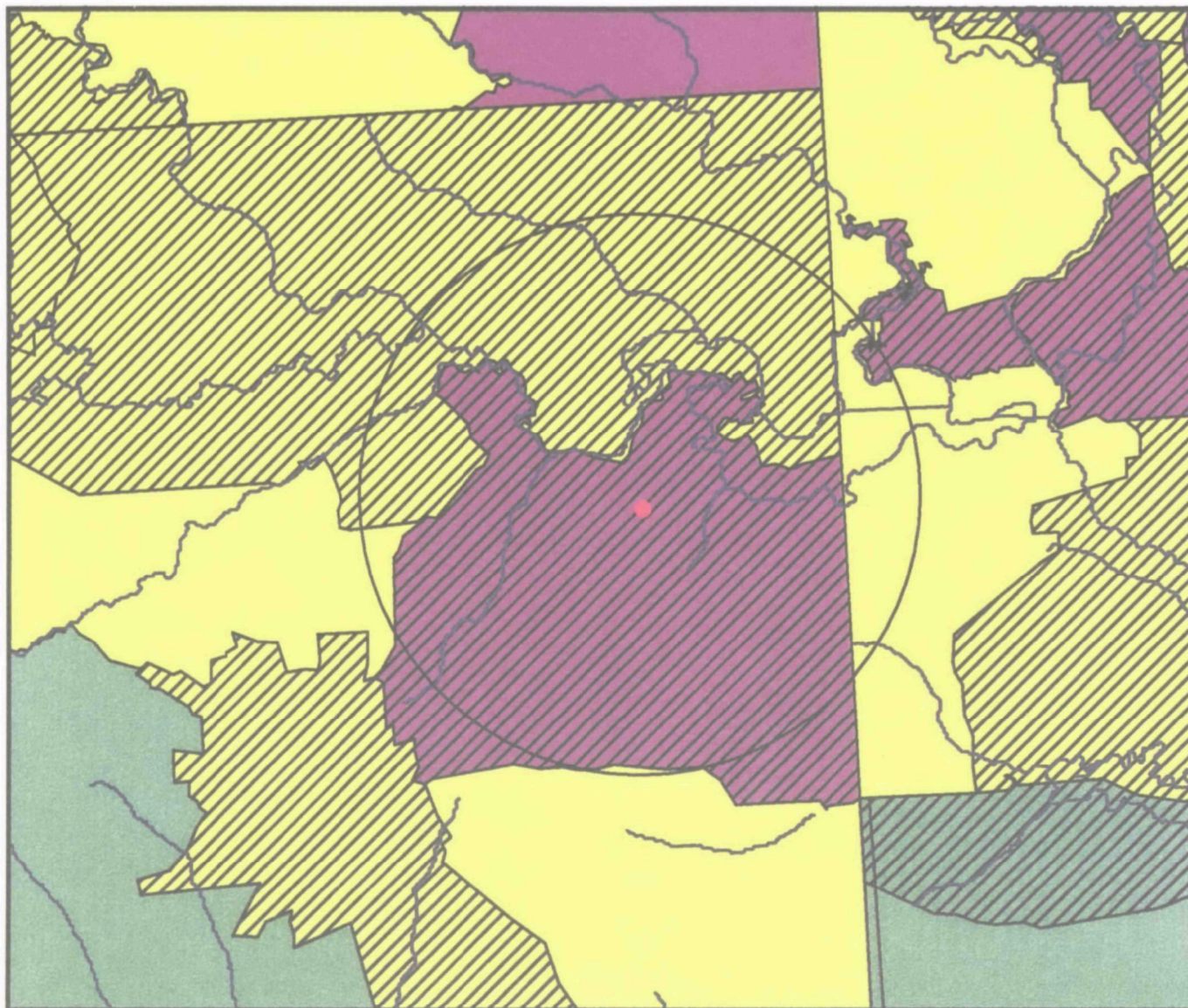
Legend

- Federal Facilities
- Zip Codes with :
 - ▨ >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- ▬ County Boundary
- ▬ Stream Reaches
- 10 Mile Radius from Facility

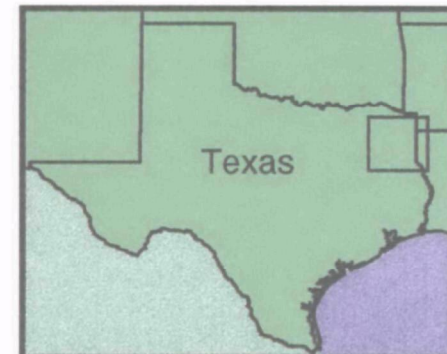
0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Army Longhorn Ammunition, Karnack

Harrison County, Texas



Enlarged Area

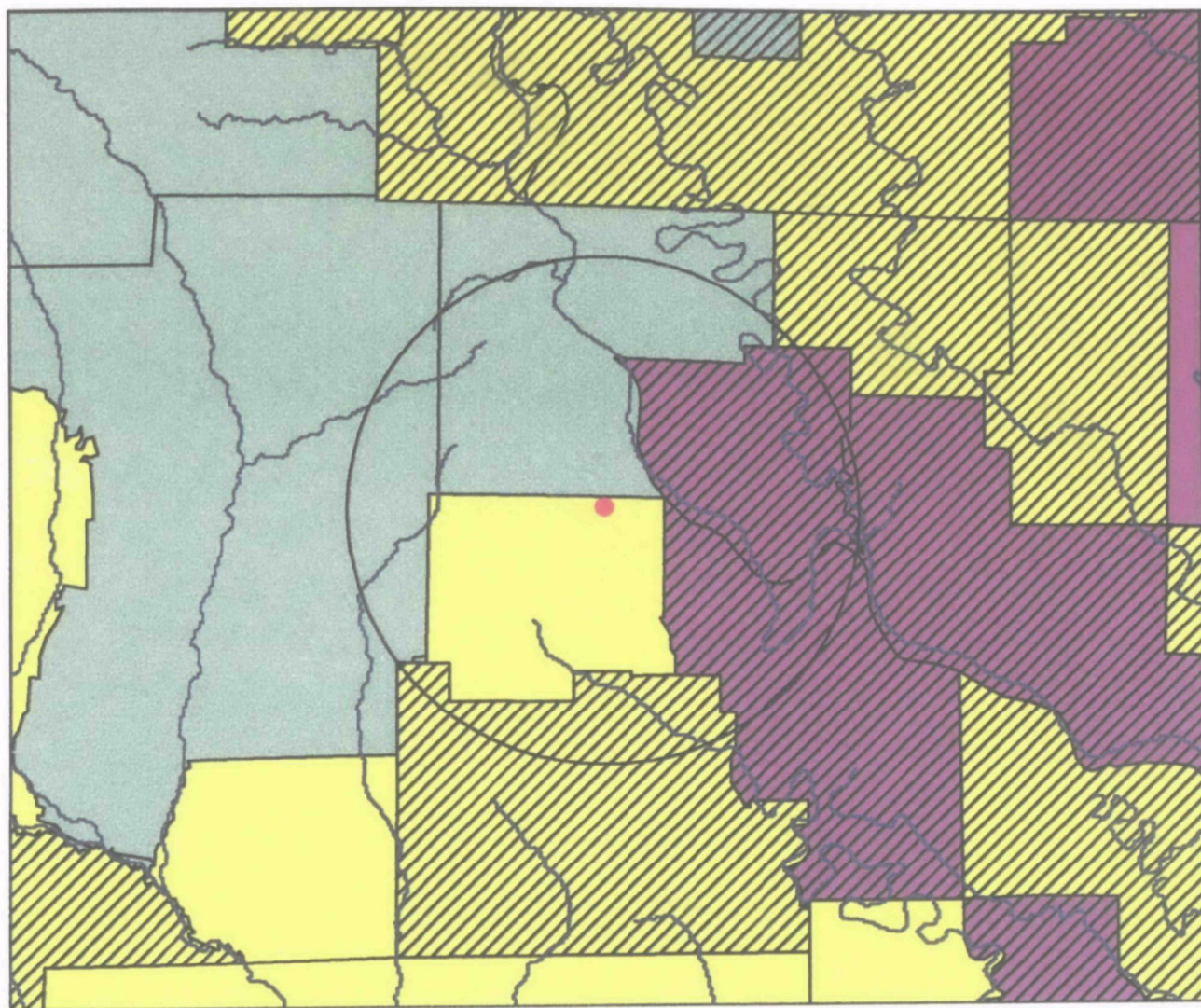


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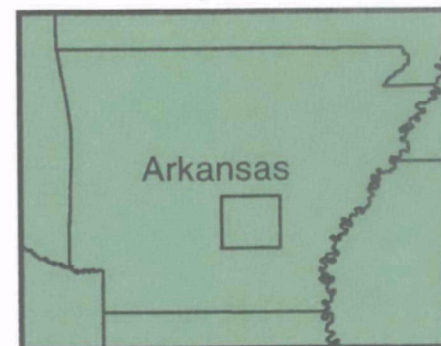
- Federal Facilities
- Zip Codes with :
- >25% Minority
- >25% of Families Below Poverty Level
- >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Army Pine Bluff Arsenal, Pine Bluff Jefferson County, Arkansas

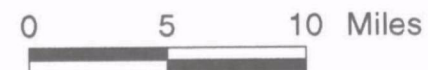


Enlarged Area

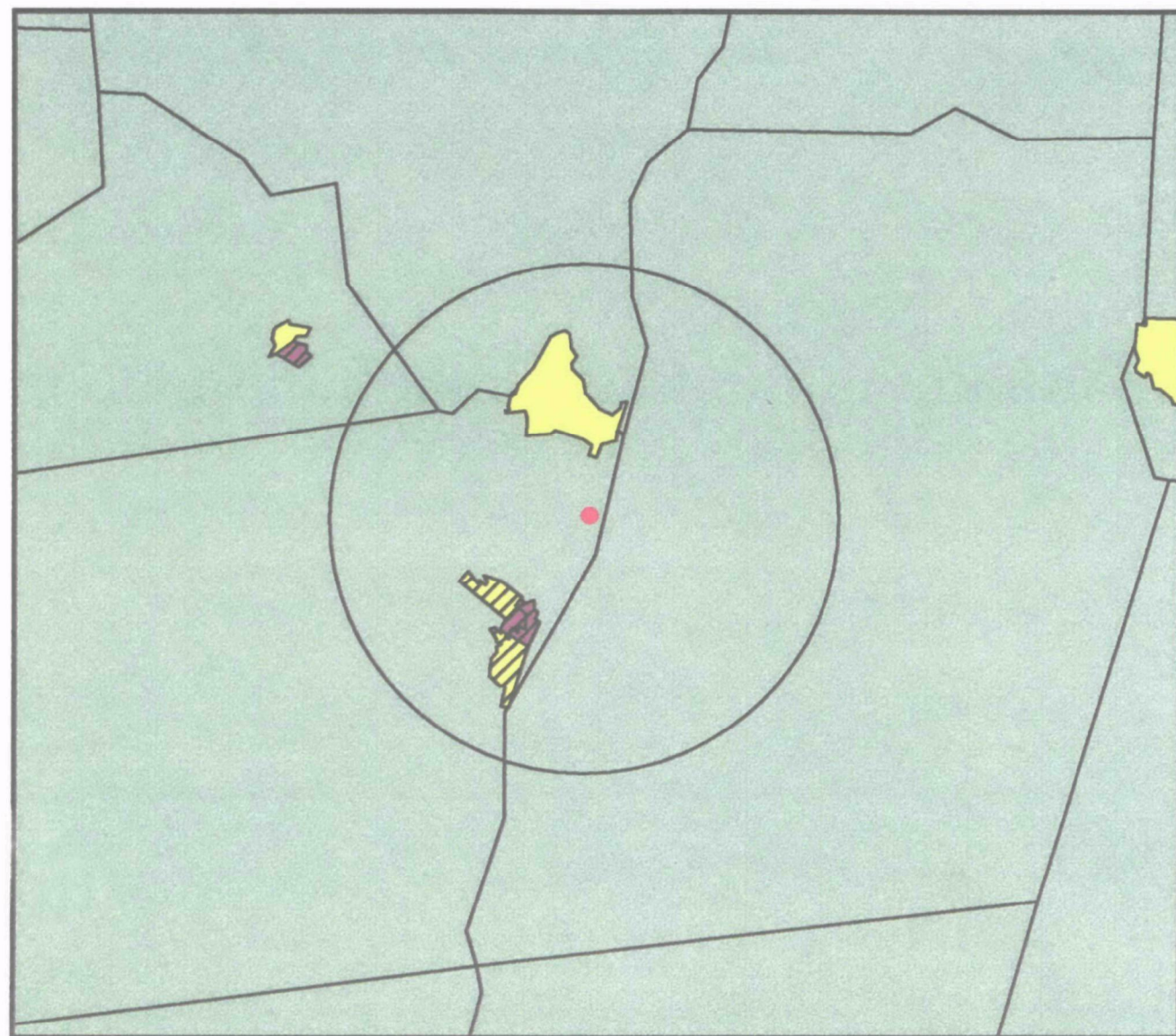


Legend

- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility



Low Income, Poverty Level, and Minorities Surrounding U.S. Army Watervliet Arsenal, Watervliet Albany County, New York



Enlarged Area

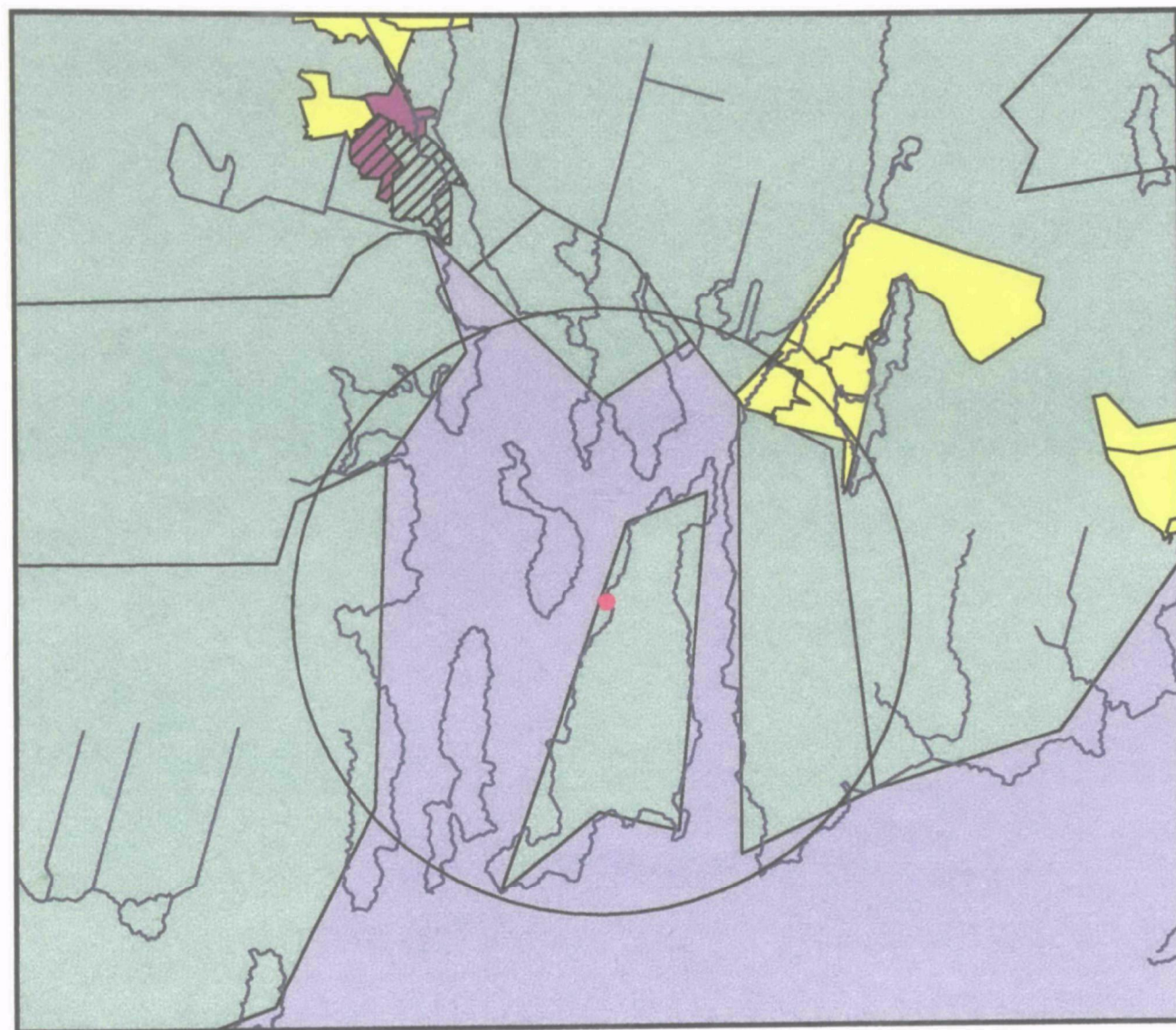


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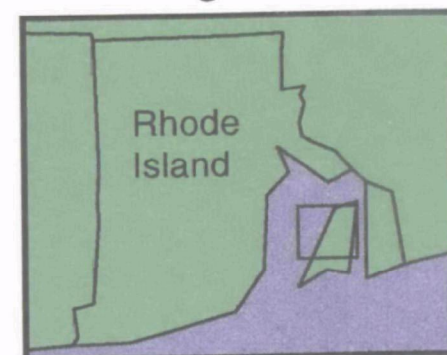
- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Defense Logistics Agency, Portsmouth Newport County, Rhode Island

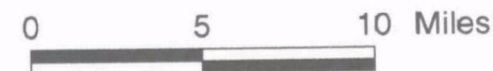


Enlarged Area

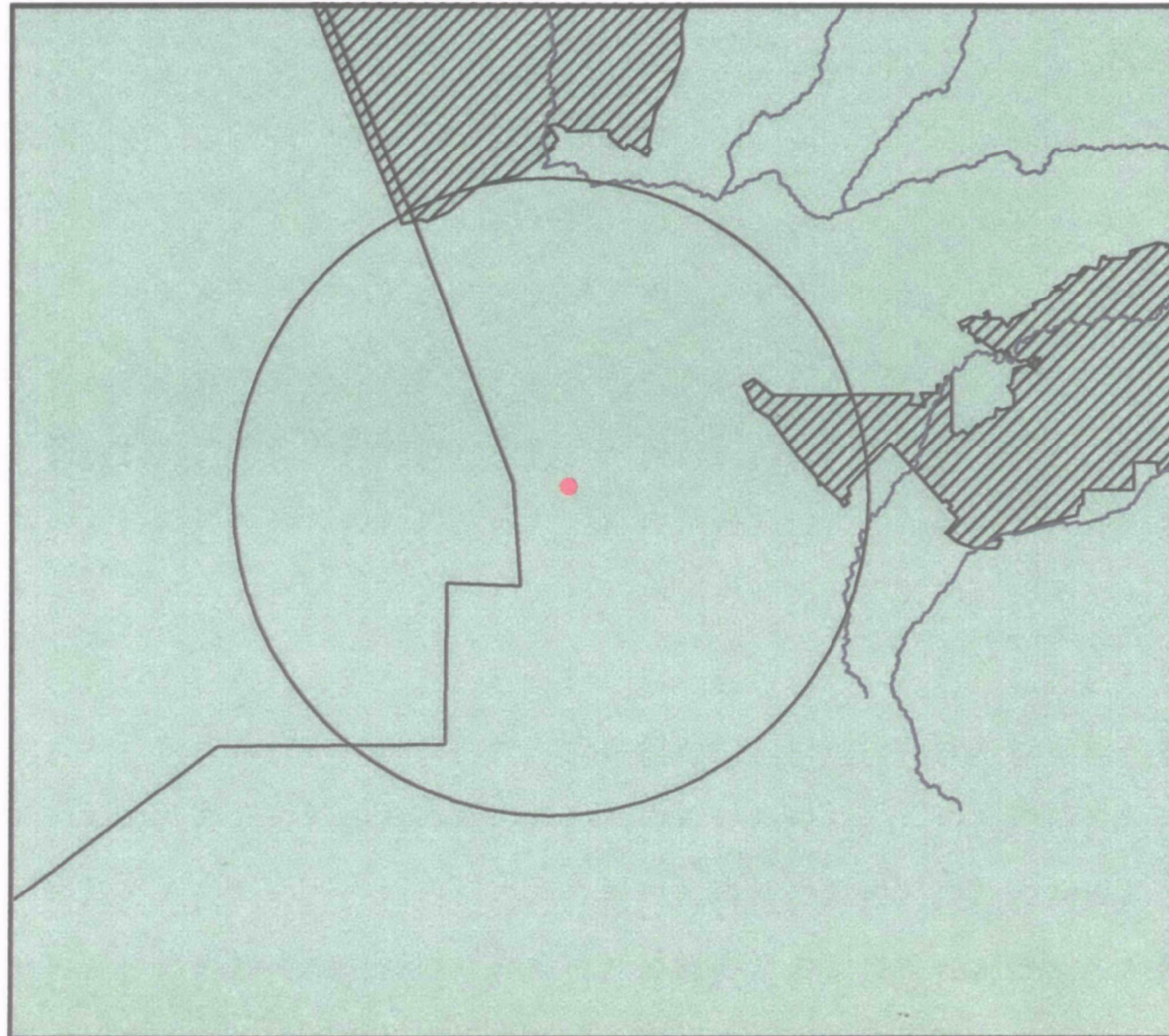


Legend

- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility



Low Income, Poverty Level, and Minorities Surrounding U.S. DOE Energy Technology Facility, Simi Hills Ventura County, California



Enlarged Area



Legend

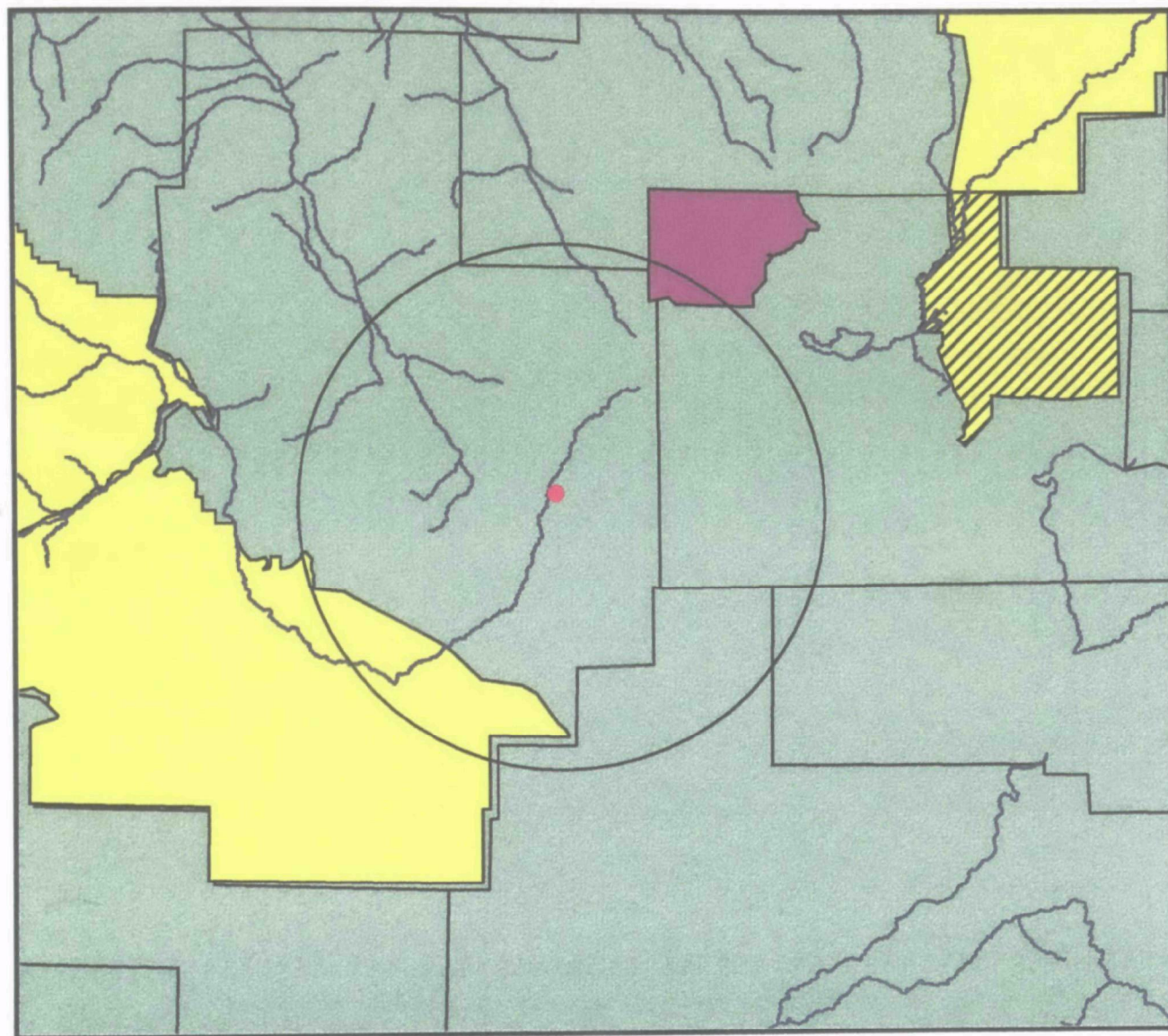
- Federal Facilities
- Zip Codes with :
- ▨ >25% Minority
- >25% of Families Below Poverty Level
- >25% Households Low Income (<\$15,000)
- ▬ County Boundary
- ▬ Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

A horizontal scale bar with markings for 0, 5, and 10 miles.

Low Income, Poverty Level, and Minorities Surrounding U.S. DOE Idaho National Lab, Scoville

Butte County, Idaho



Enlarged Area

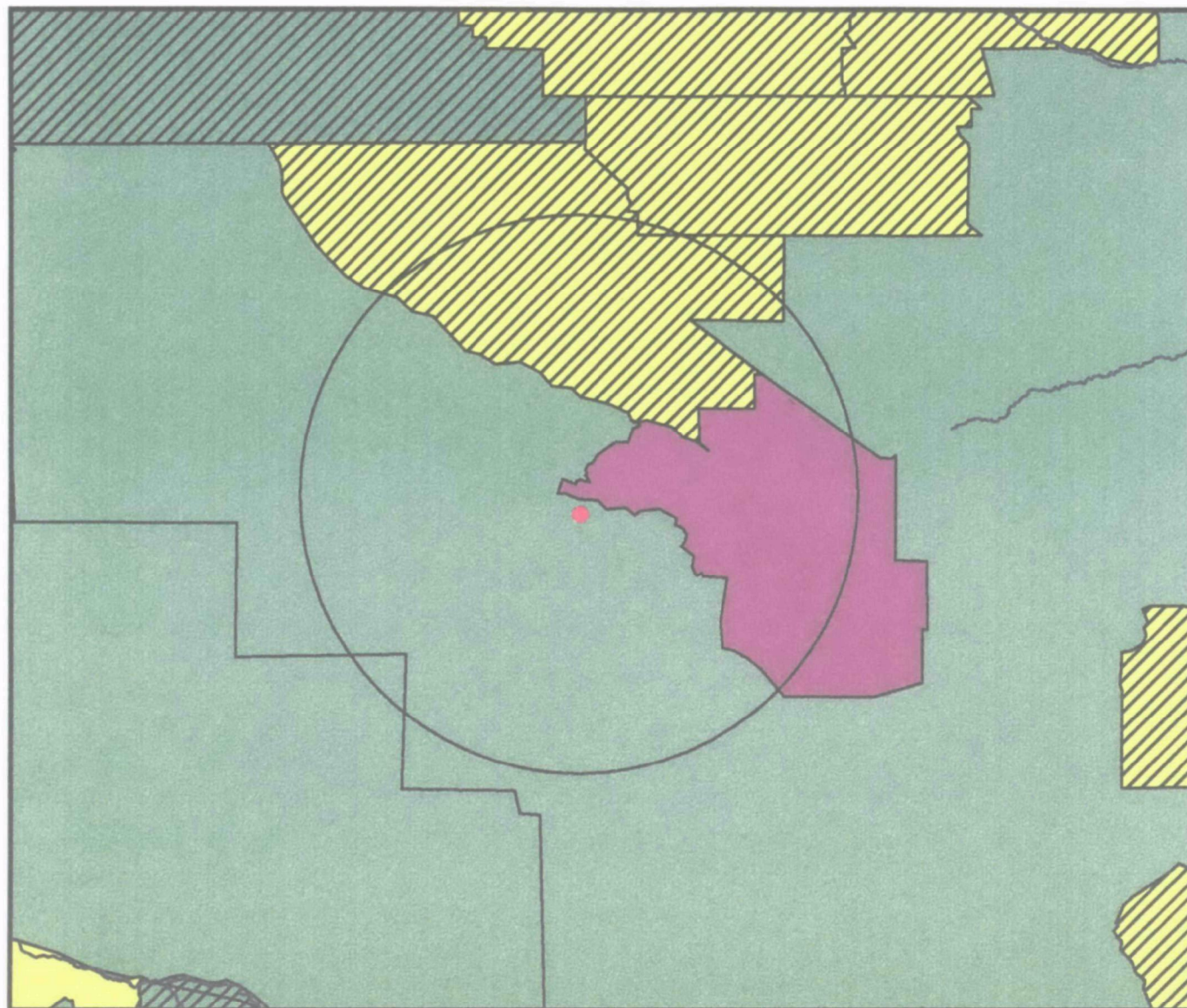


Legend

- Federal Facilities
- Zip Codes with :
 - ▨ >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- ▭ County Boundary
- ▭ Stream Reaches
- 20 Mile Radius from Facility

0 10 20 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. DOE/Navy Petroleum Facility, Tupman Kern County, California



Enlarged Area

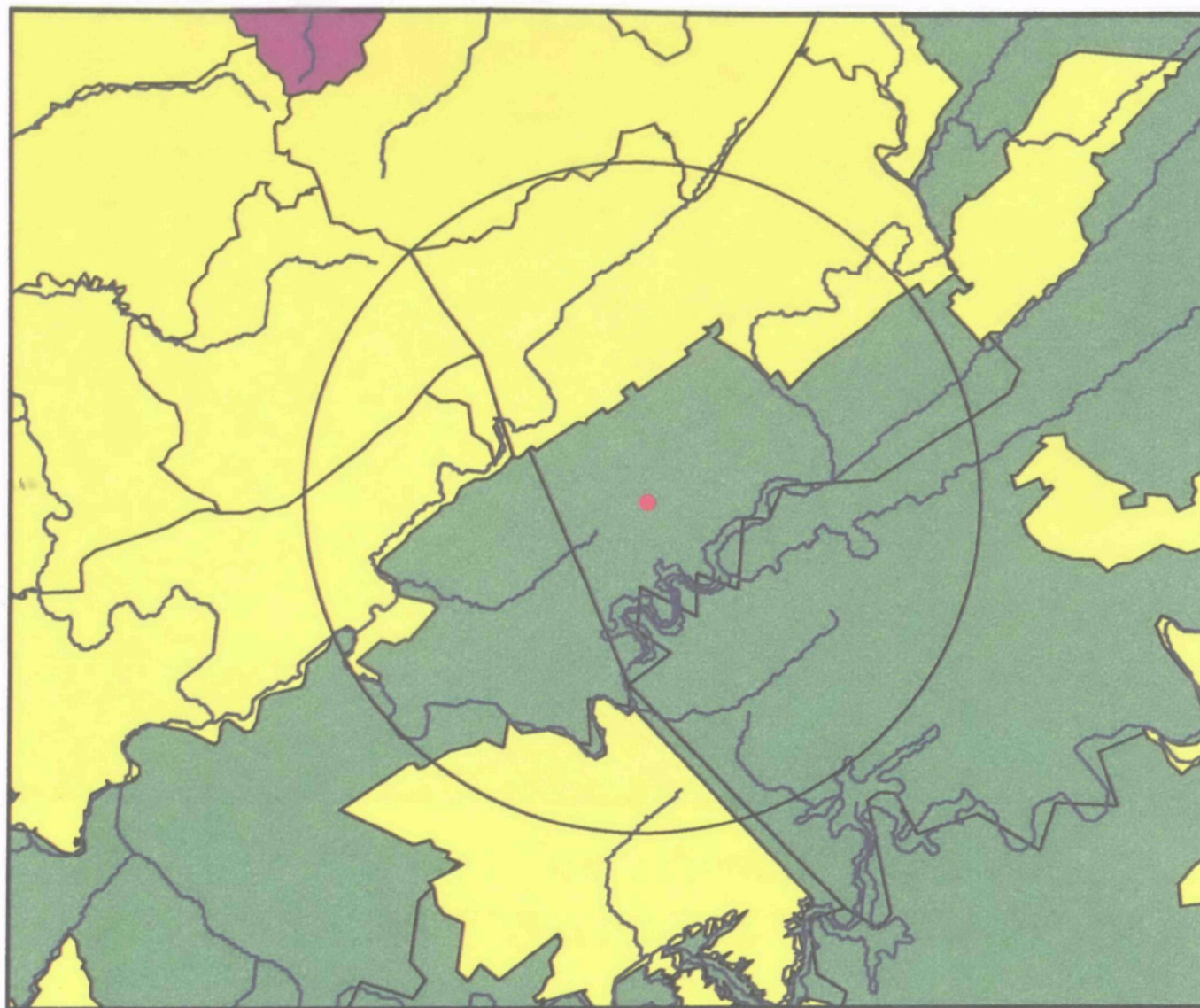


Legend

- Federal Facilities
- Zip Codes with :
- >25% Minority
- >25% of Families Below Poverty Level
- >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility



Low Income, Poverty Level, and Minorities Surrounding U.S. DOE Oak Ridge Plant Y-12, Oak Ridge Anderson County, Tennessee



Enlarged Area

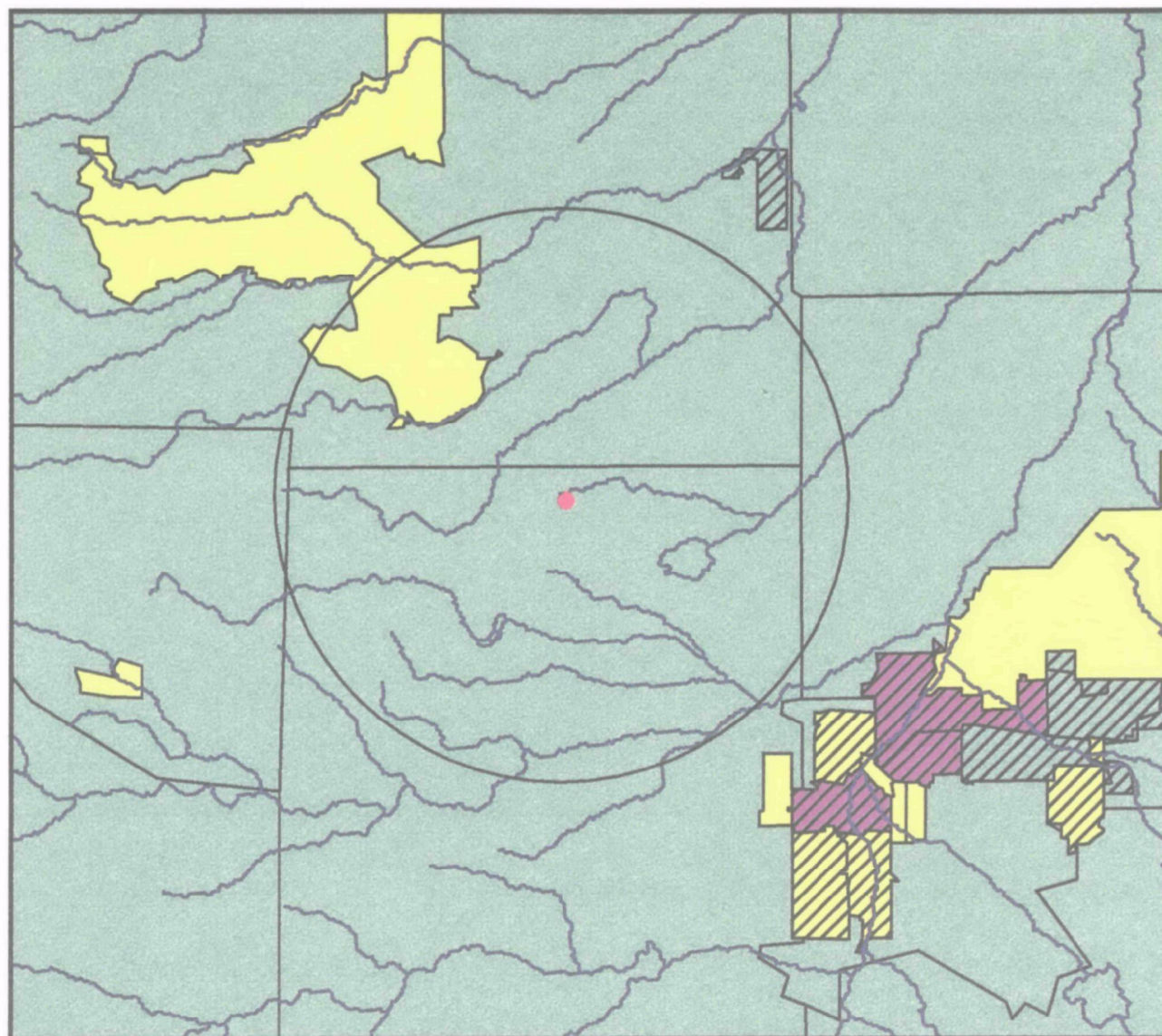


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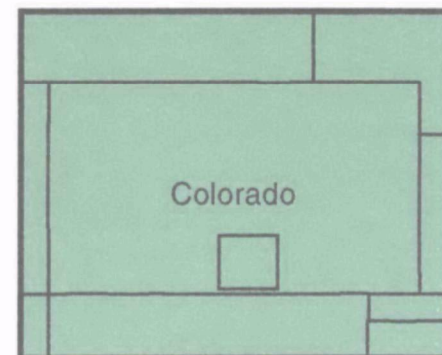
- Federal Facilities
- Zip Codes with :
 - ▨ >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- ▬ County Boundary
- ▬ Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. DOE Rocky Flats Facility, Golden Jefferson County, Colorado



Enlarged Area



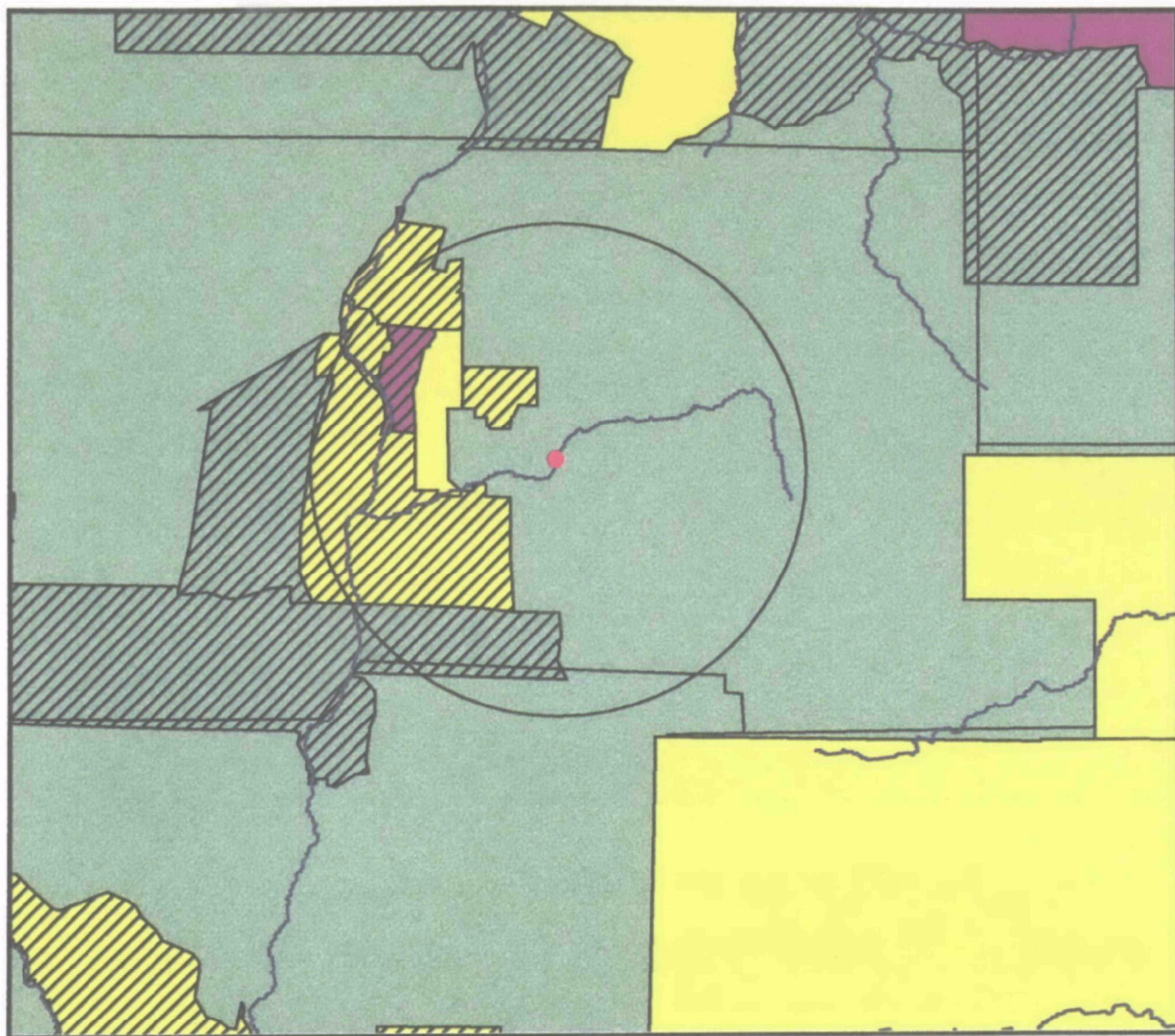
Legend

- Federal Facilities
- Zip Codes with :
 - ▨ >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- ▭ County Boundary
- ▬ Stream Reaches
- 10 Mile Radius from Facility

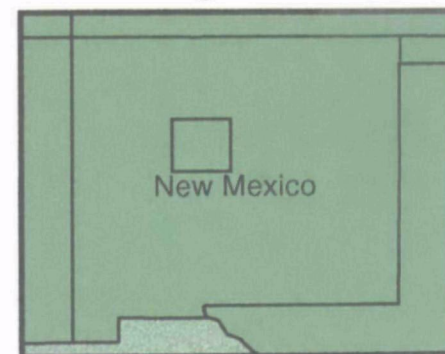
0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. DOE Sandia National Lab, Albuquerque

Bernalillo County, New Mexico



Enlarged Area



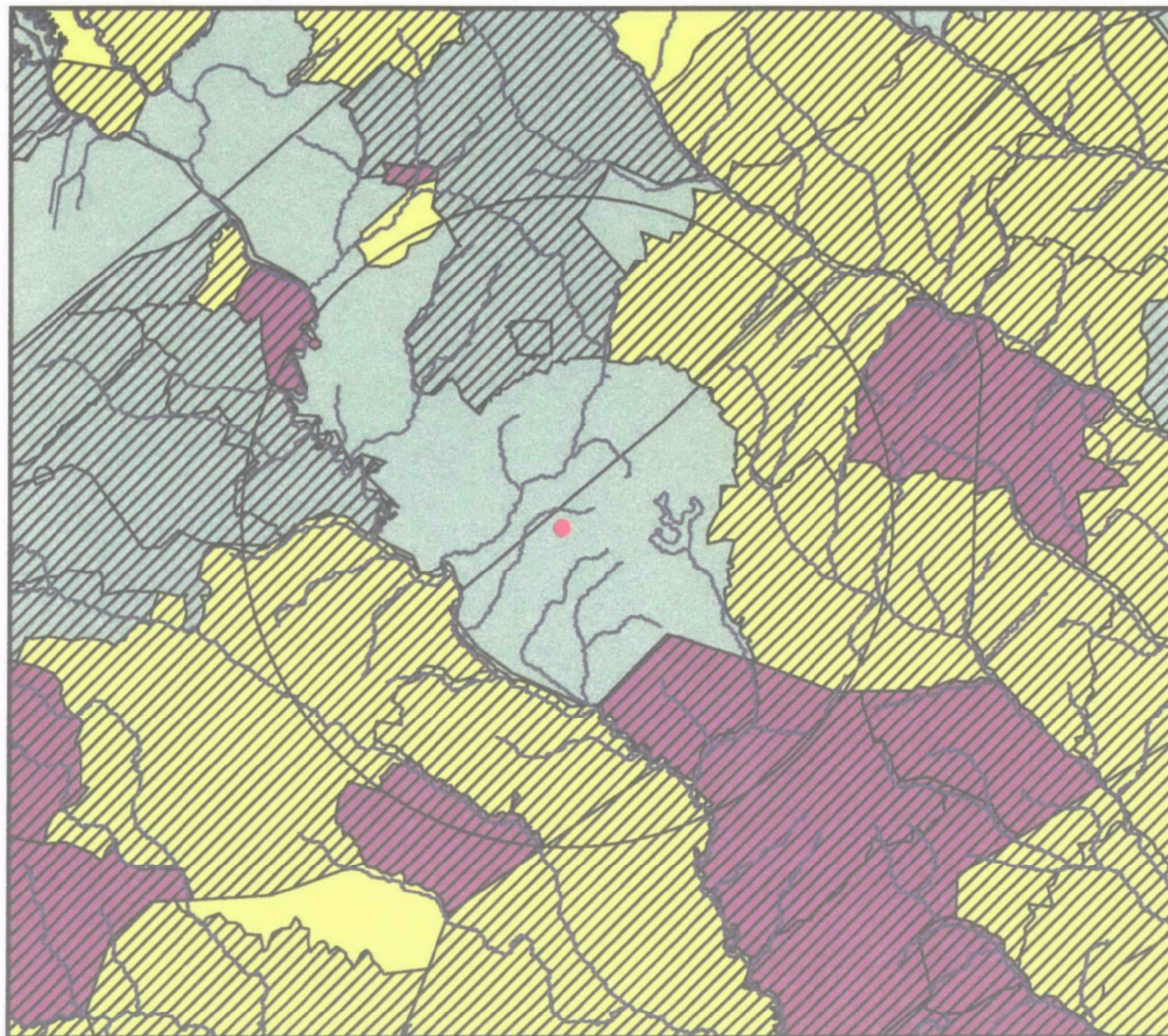
Legend

- Federal Facilities
- Zip Codes with :
 - ▨ >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- ▭ County Boundary
- ▭ Stream Reaches
- 10 Mile Radius from Facility



Low Income, Poverty Level, and Minorities Surrounding U.S. DOE Savannah River Facility, Aiken

Aiken County, South Carolina



Enlarged Area

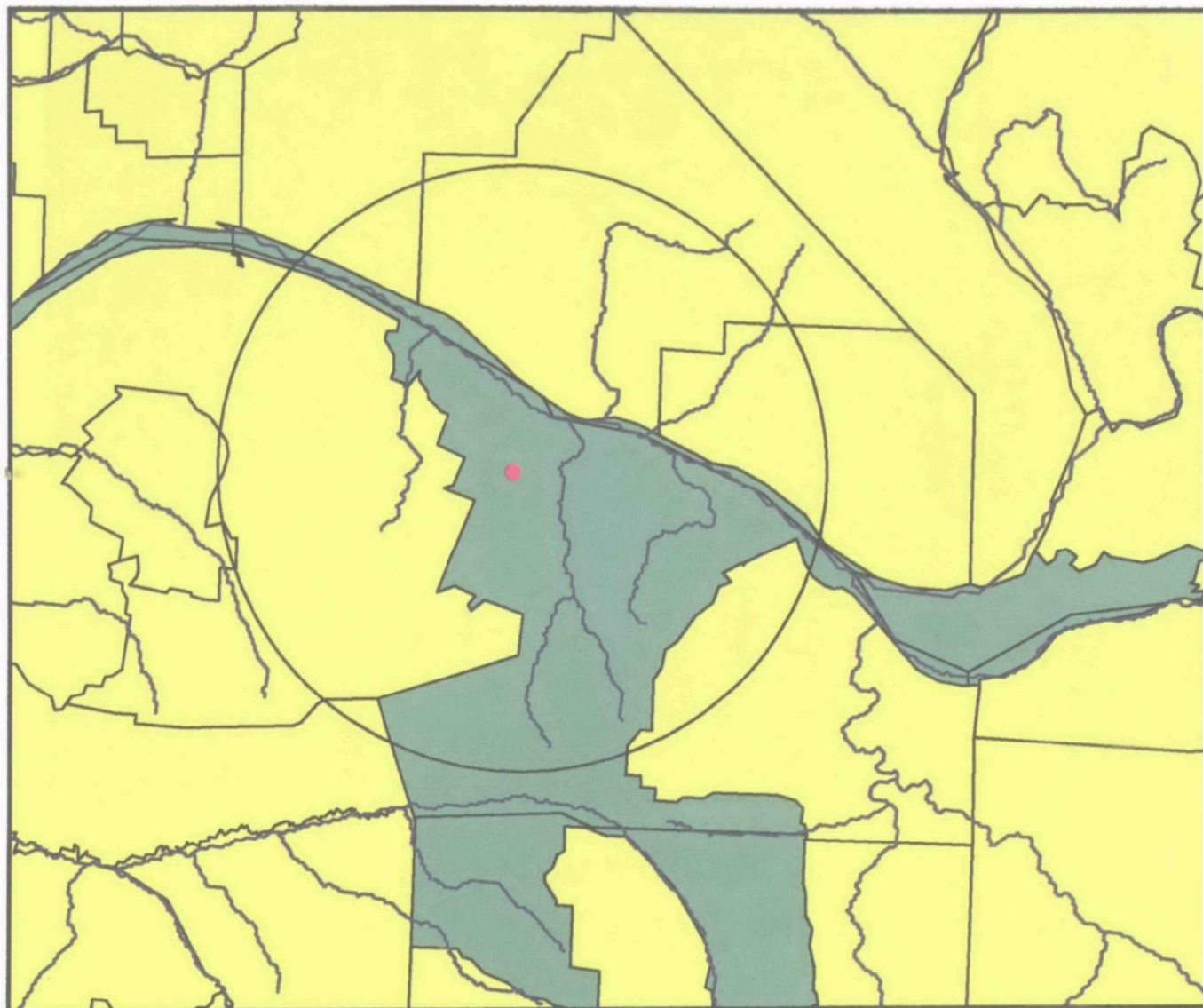


Legend

- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 20 Mile Radius from Facility



Low Income, Poverty Level, and Minorities Surrounding U.S. Enrichment Corp, Paducah McCracken County, Kentucky



Enlarged Area



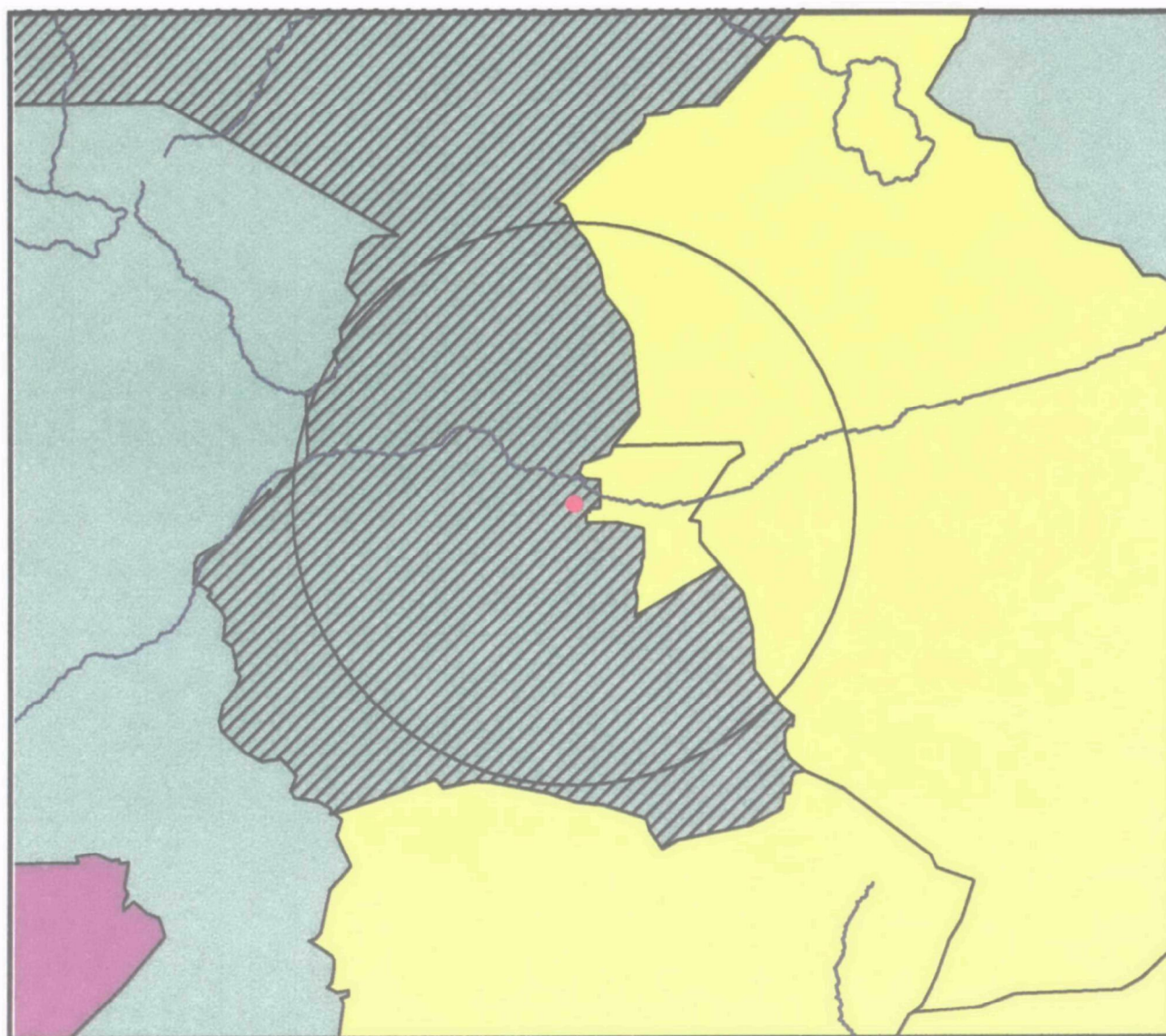
Legend

- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility



Low Income, Poverty Level, and Minorities Surrounding U.S. Marines Facility, Barstow

San Bernardino County, California



Enlarged Area

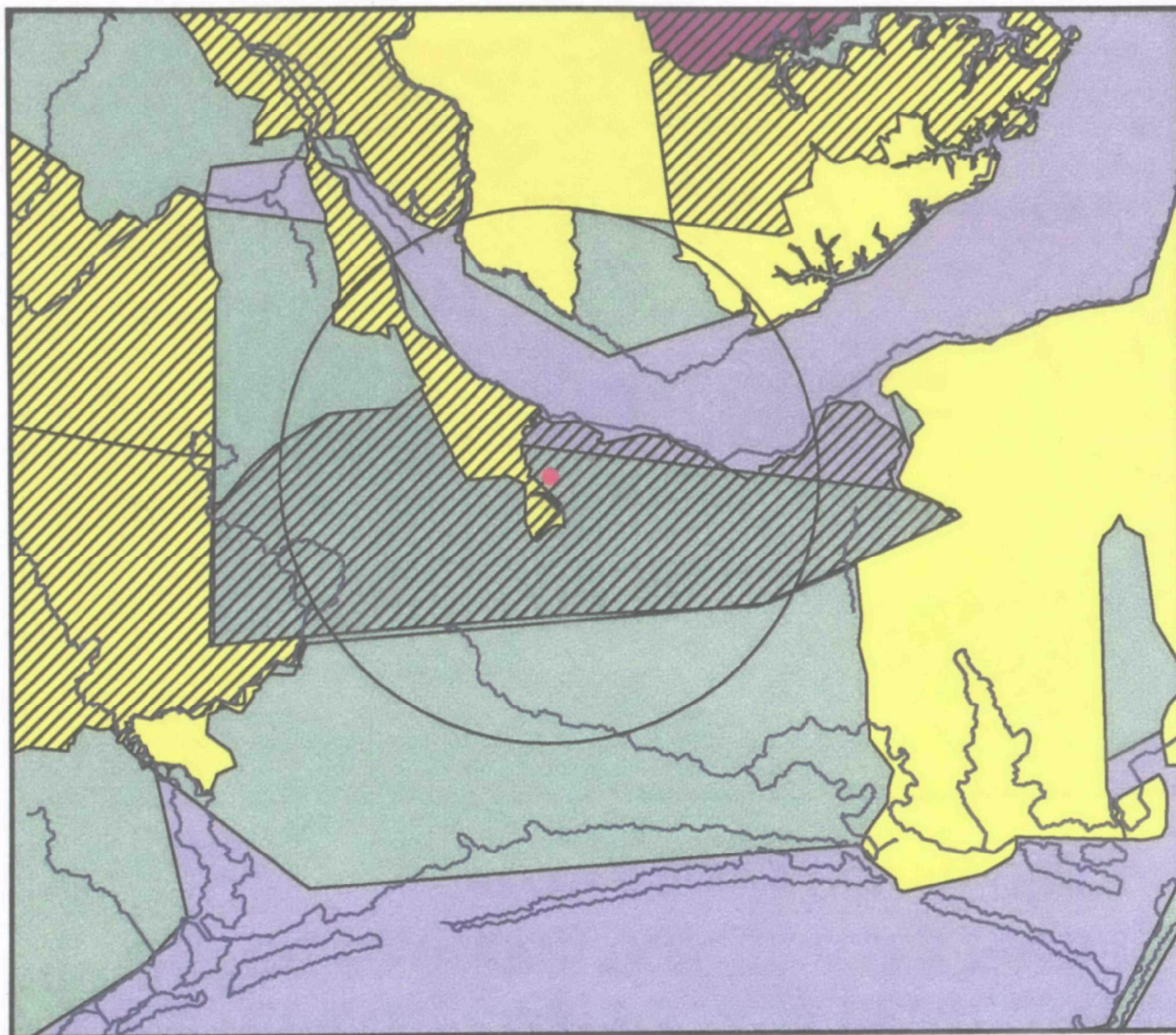


Legend

- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility



Low Income, Poverty Level, and Minorities Surrounding U.S. Marines Facility, Cherry Point Craven County, North Carolina



Enlarged Area



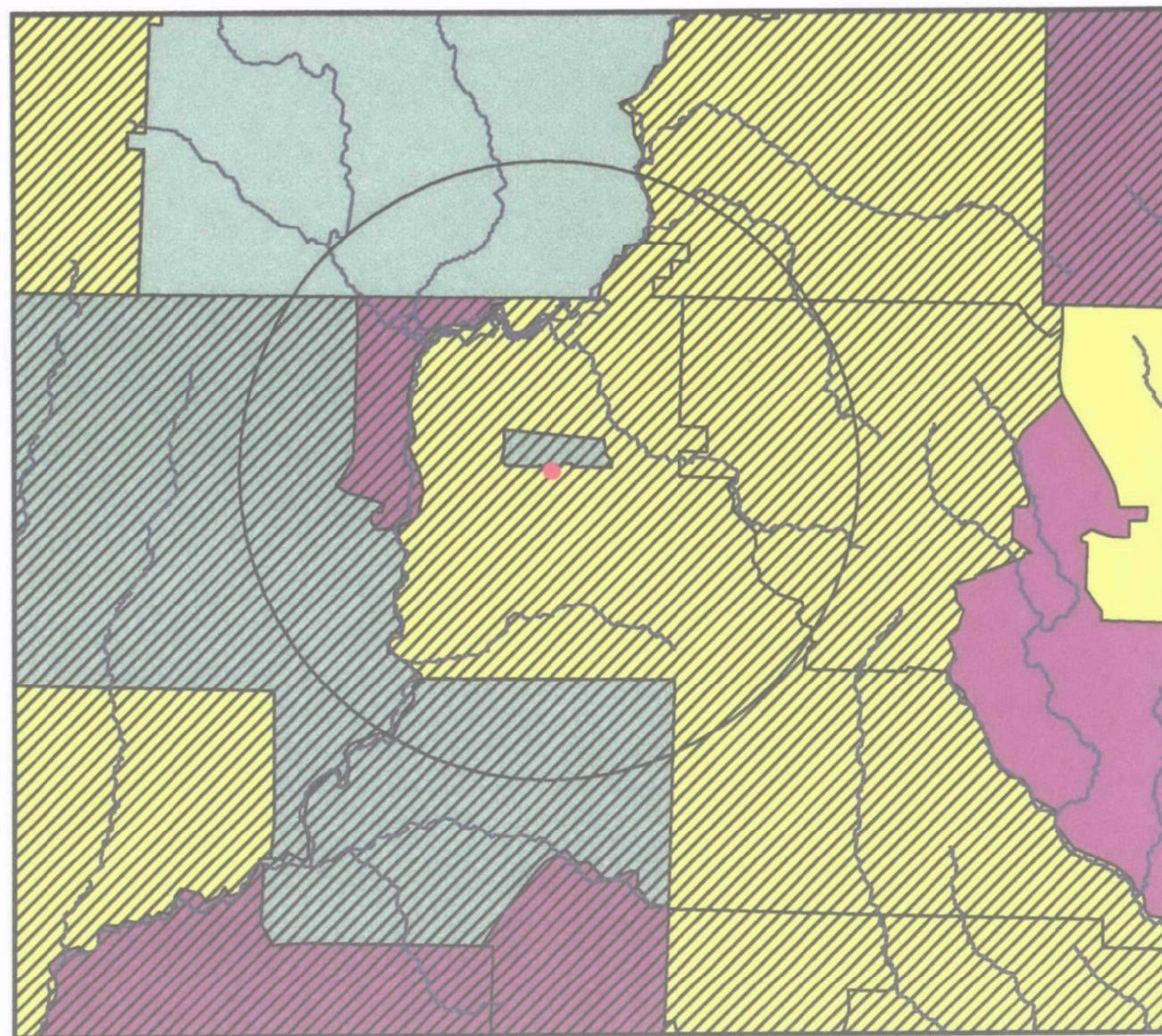
Legend

- Federal Facilities
- Zip Codes with :
- >25% Minority
- >25% of Families Below Poverty Level
- >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Marines Logistics Facility, Albany

Dougherty County, Georgia



Enlarged Area

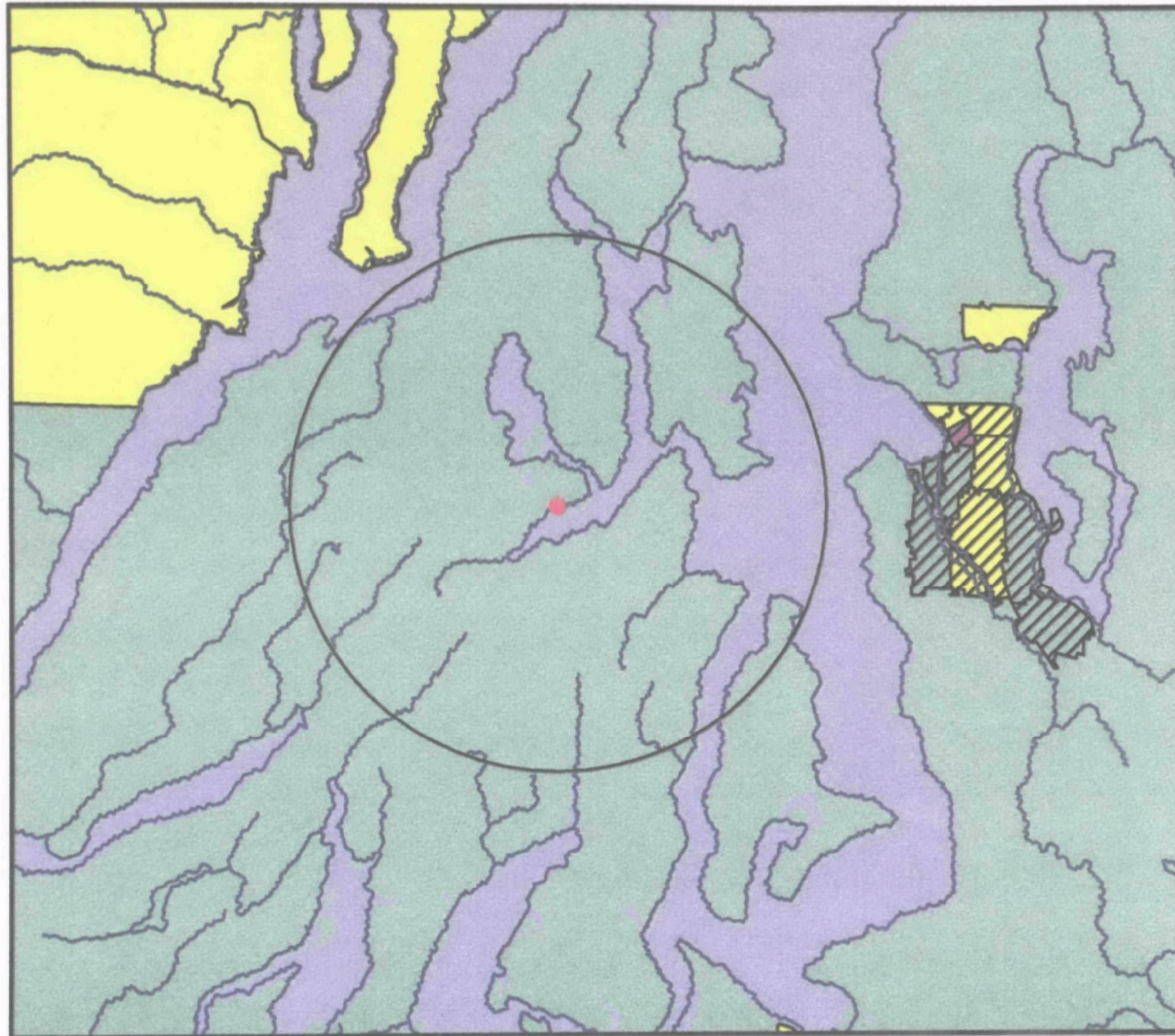


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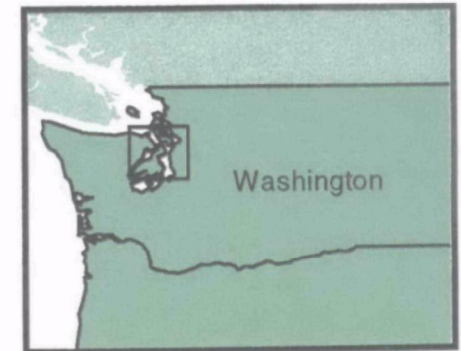
- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Navy Puget Sound Facility, Bremerton Kitsap County, Washington



Enlarged Area



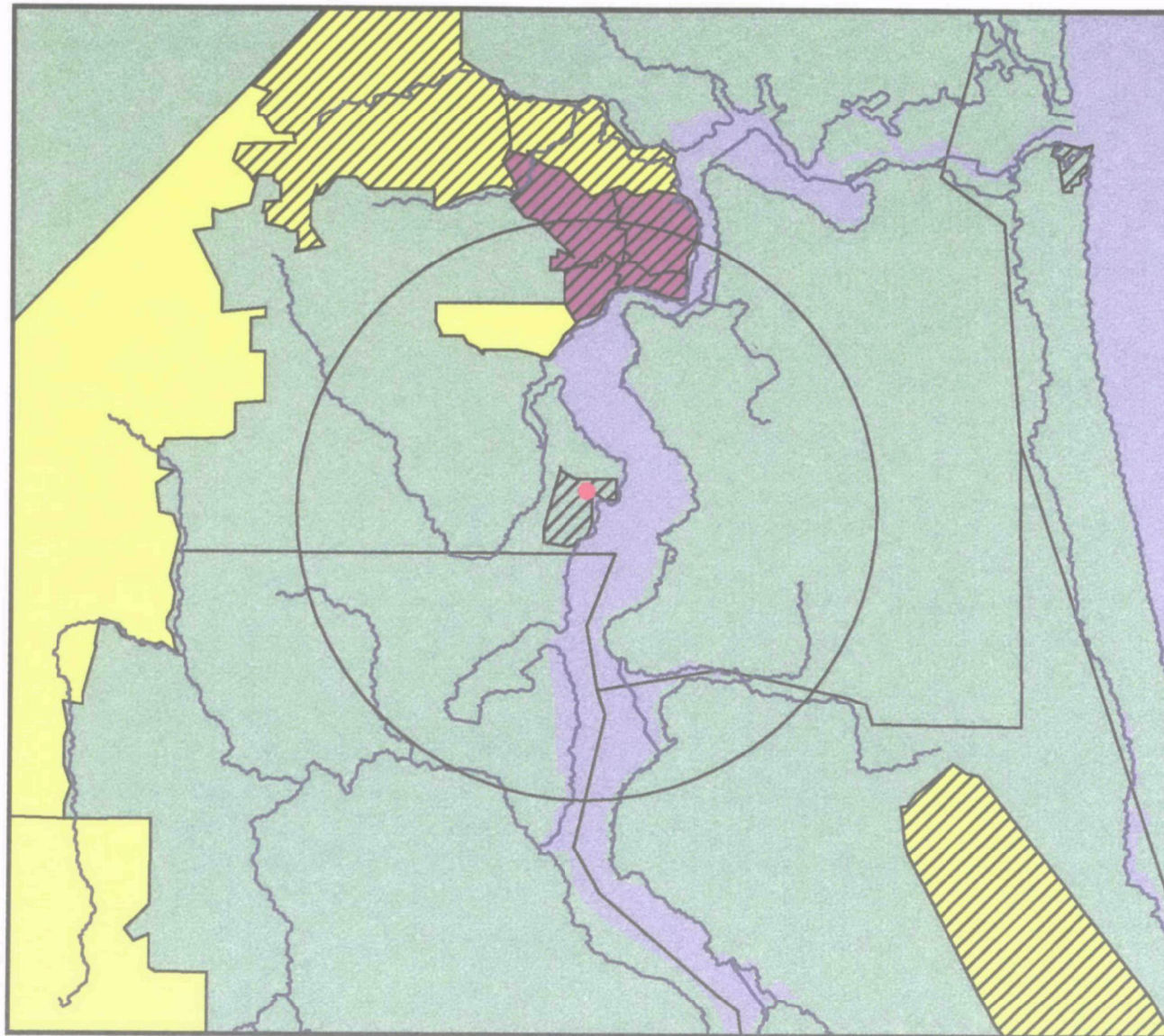
Legend

- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches / Shore Lines
- 10 Mile Radius from Facility

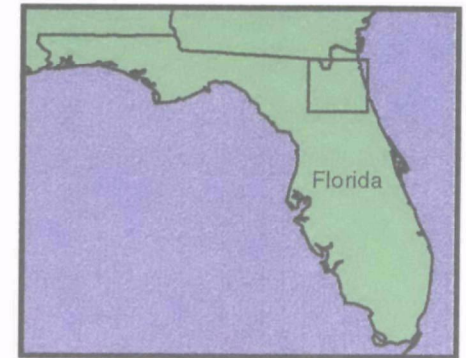
0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Navy Facility, Jacksonville

Duval County, Florida



Enlarged Area



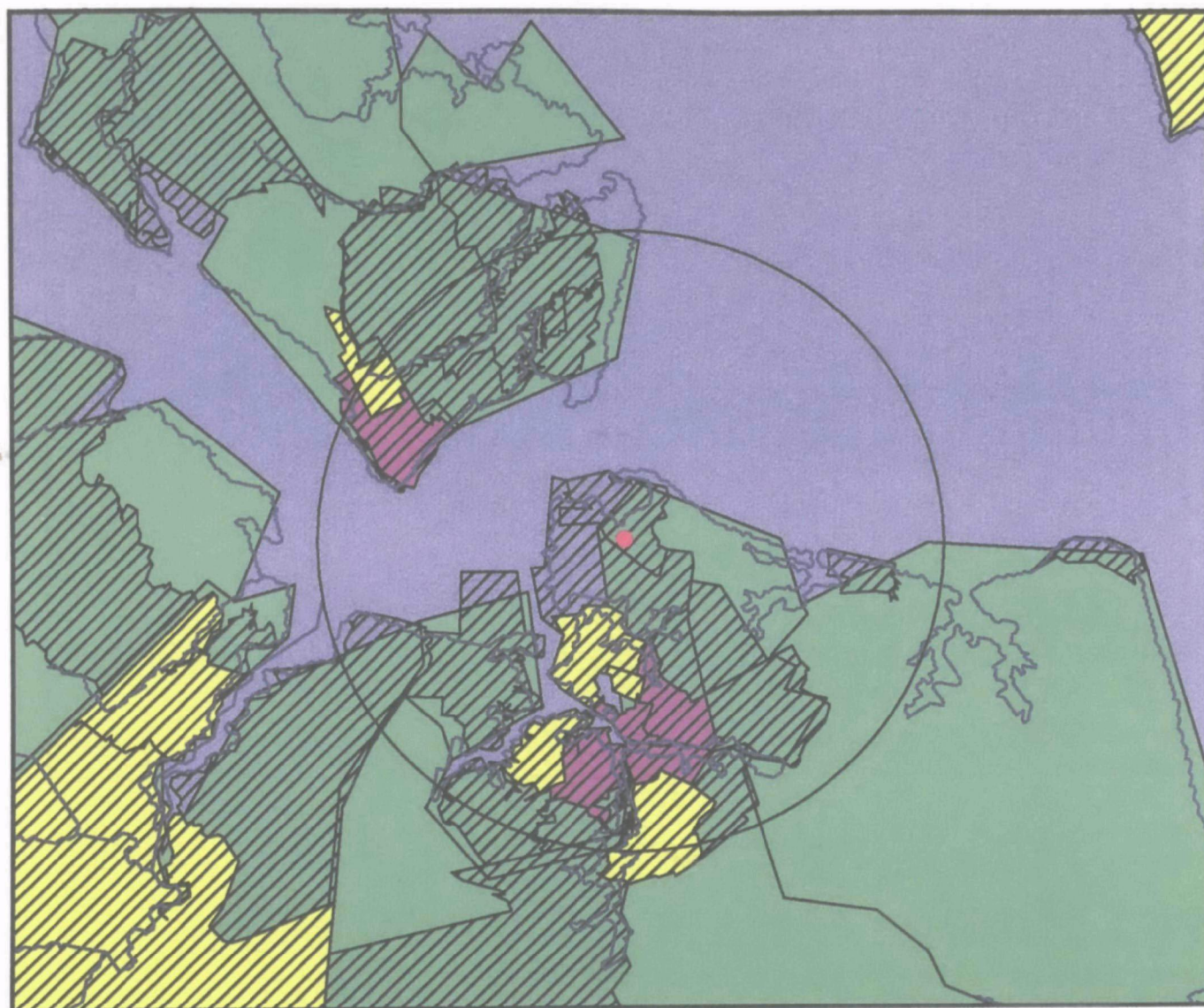
Legend

- Federal Facilities
- Zip Codes with :
- >25% Minority
- >25% of Families Below Poverty Level
- >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

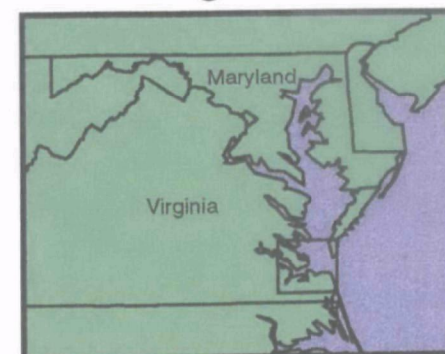
0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Navy Facility, Norfolk

County of Norfolk City, Virginia



Enlarged Area

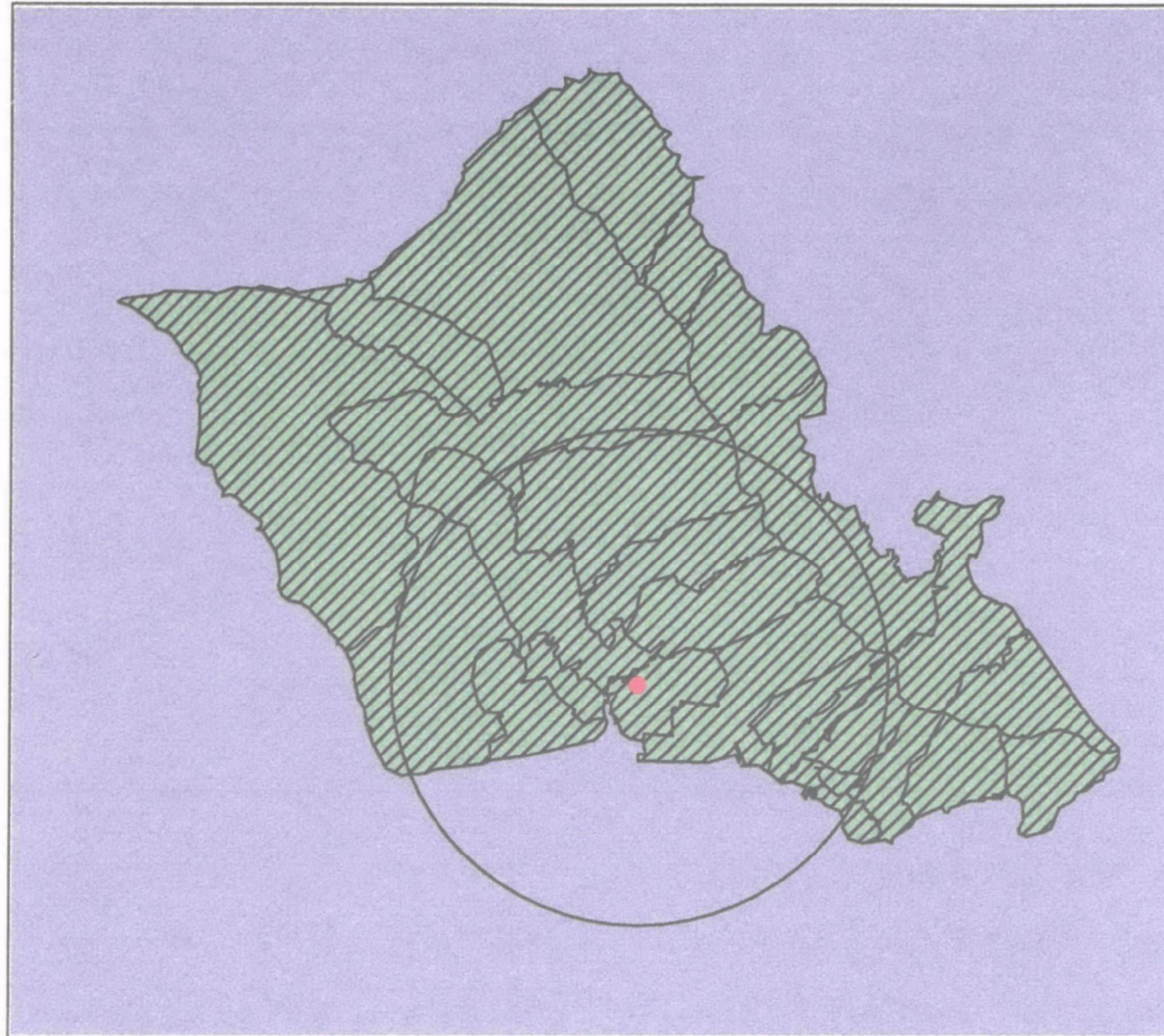


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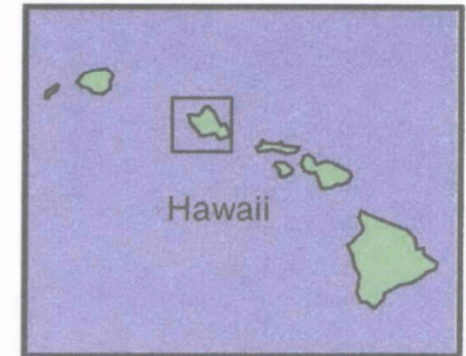
- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Navy Facility, Pearl Harbor Honolulu County, Hawaii



Enlarged Area



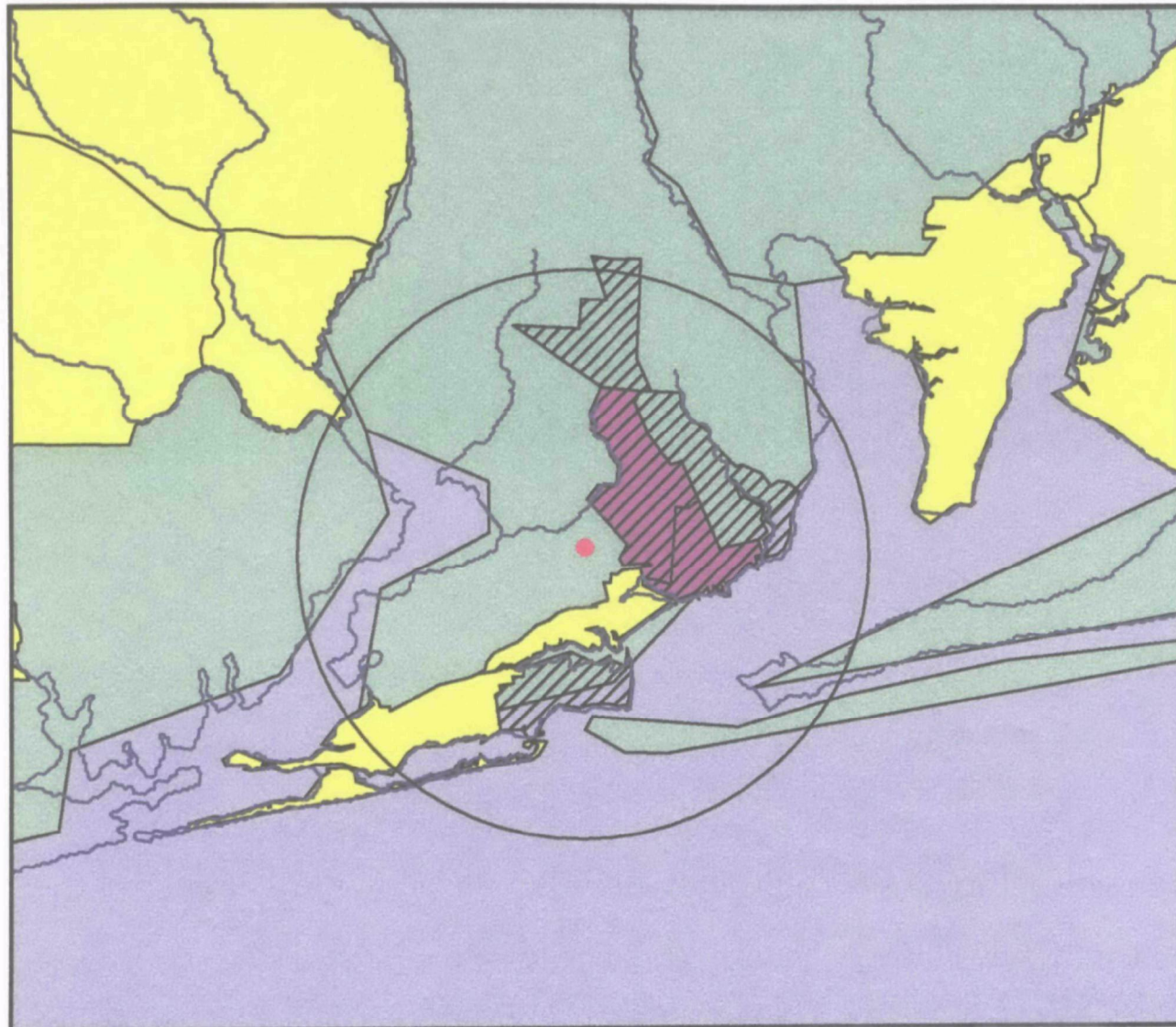
Legend

- Federal Facilities
- Zip Codes with :
 - >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
 - County Boundary
 - Stream Reaches
 - 10 Mile Radius from Facility



Low Income, Poverty Level, and Minorities Surrounding U.S. Navy Facility, Pensacola

Escambia County, FL

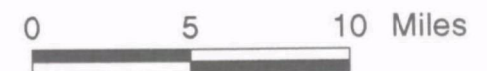


Enlarged Area



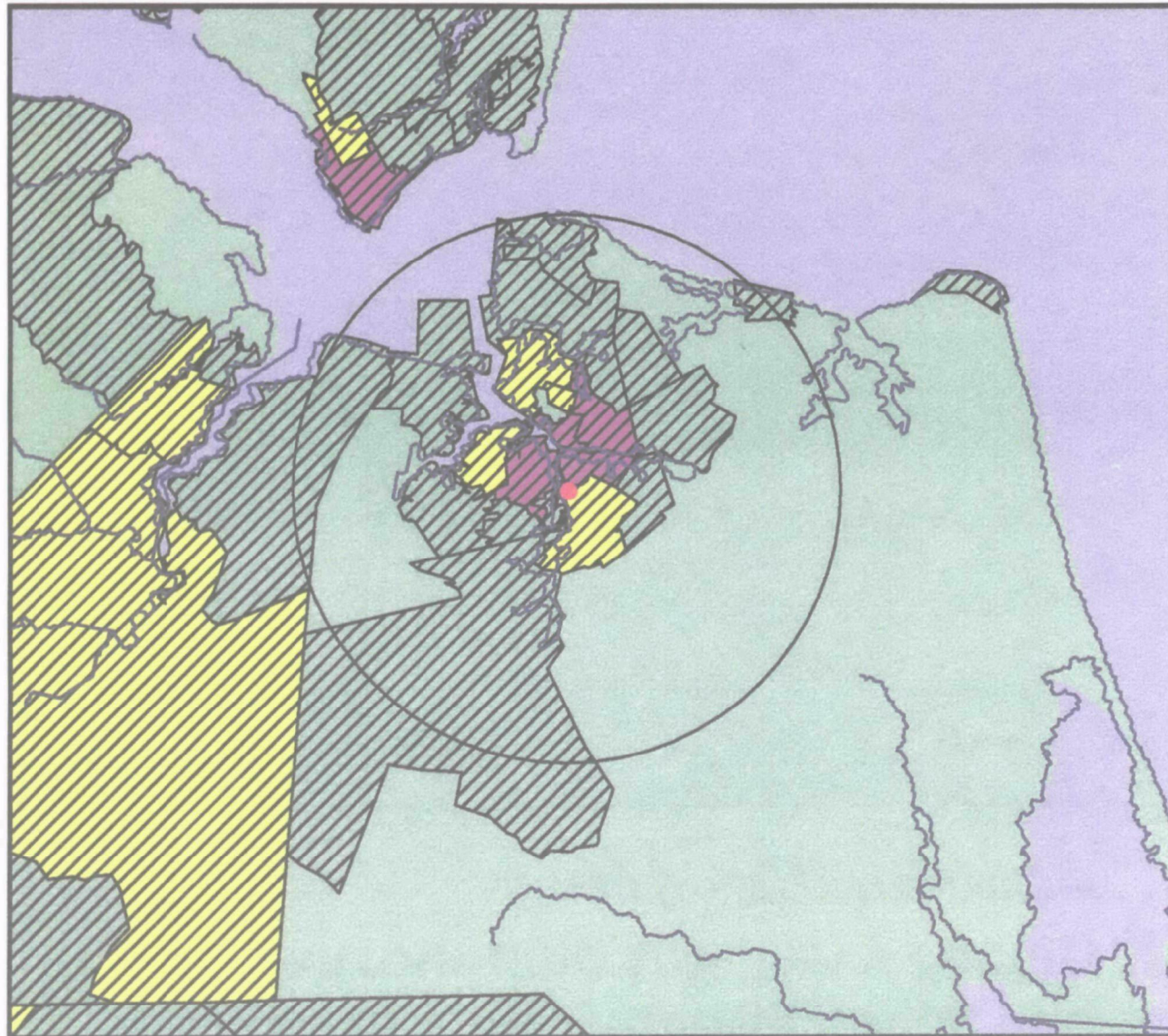
Legend

- Federal Facilities
- Zip Codes with :
 - ▨ >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- ▭ County Boundary
- ▭ Stream Reaches
- 10 Mile Radius from Facility

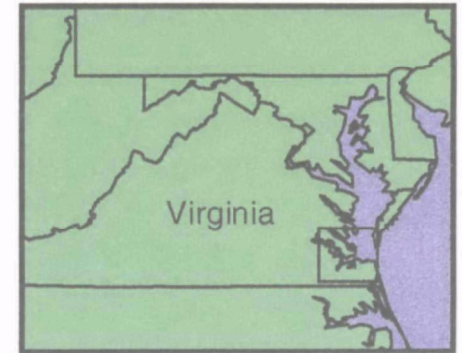


Low Income, Poverty Level, and Minorities Surrounding U.S. Navy Facility, Portsmouth

County of Portsmouth City, Virginia



Enlarged Area

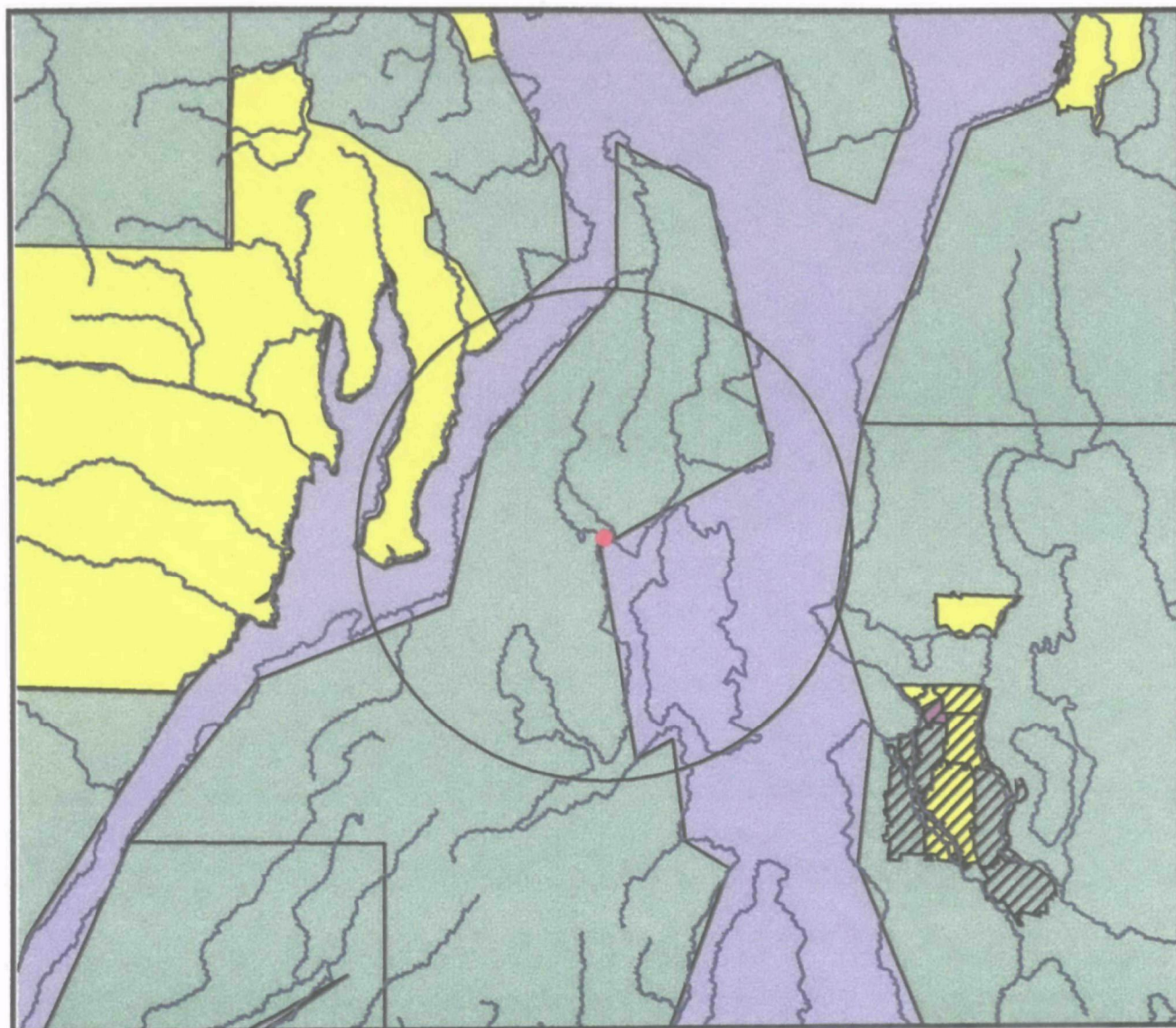


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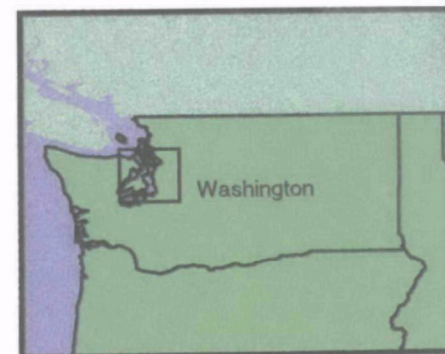
- Federal Facilities
- Zip Codes with :
 - ▨ >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- ▭ County Boundary
- ▭ Stream Reaches / Shore Lines
- 10 Mile Radius from Facility

0 5 10 Miles

Low Income, Poverty Level, and Minorities Surrounding U.S. Navy Facility, Keyport Kitsap County, Washington

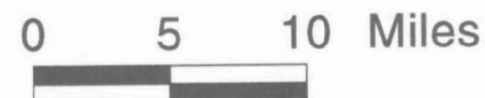


Enlarged Area

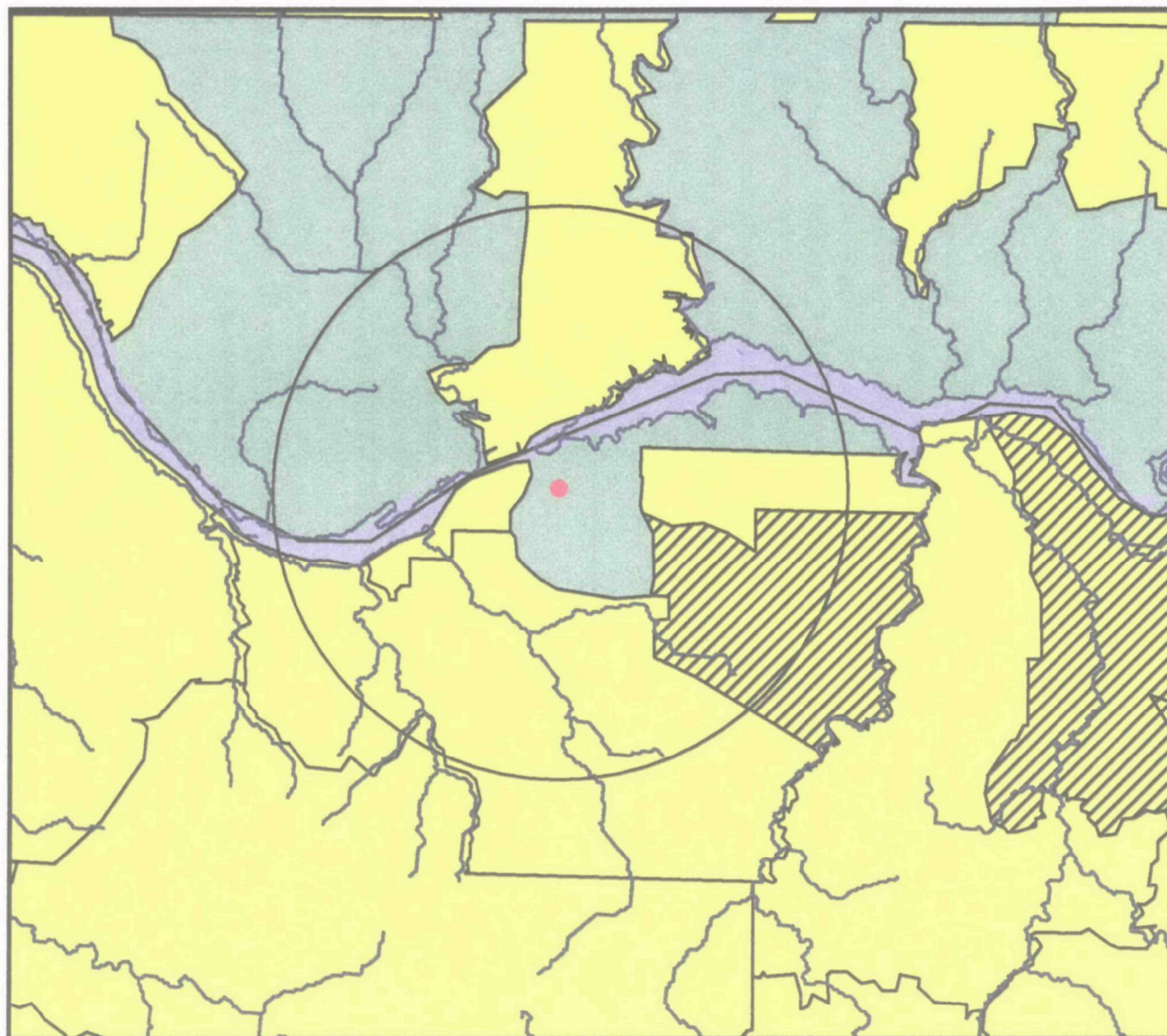


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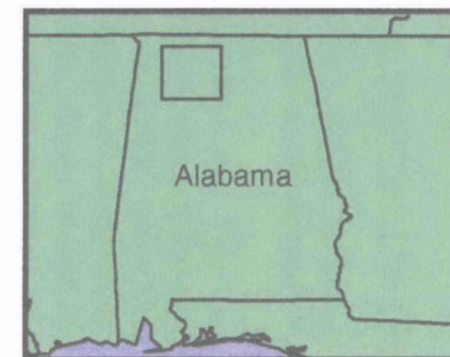
- Federal Facilities
- Zip Codes with :
 - ▨ >25% Minority
 - >25% of Families Below Poverty Level
 - >25% Households Low Income (<\$15,000)
- ▭ County Boundary
- ▭ Stream Reaches
- 10 Mile Radius from Facility



Low Income, Poverty Level, and Minorities Surrounding U.S. TVA Environmental Facility, Muscle Shoals Colbert County, Alabama



Enlarged Area



Legend

- Federal Facilities
- Zip Codes with :
- >25% Minority
- >25% of Families Below Poverty Level
- >25% Households Low Income (<\$15,000)
- County Boundary
- Stream Reaches
- 10 Mile Radius from Facility



D. Definition of Significant Noncompliance (SNC)

Federal facilities in “significant noncompliance” (SNC) are identified on the basis of certain data fields within the Integrated Data for Enforcement Analysis (IDEA) system. As the name suggests, IDEA integrates data from a number of media- and program-specific data bases. Some of these data bases contain formal SNC indicators, while others do not have SNC indicators per se, but instead rely on a combination of other data fields to identify SNC facilities. This document summarizes how the concept of SNC applies to Federal facilities regulated under the following environmental statutes/programs:

- Resource Conservation and Recovery Act (RCRA);
- National Pollutant Discharge Elimination System (NPDES);
- Clean Air Act (CAA); and
- Toxic Substances Control Act (TSCA), Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and Emergency Planning and Community Right-to-Know Act (EPCRA).

Note: Although the condition that triggered SNC status for a particular Federal facility may have been subsequently addressed from the facility’s perspective; the facility may remain in SNC within the relevant tracking system until EPA or appropriate State authority determines that the underlying condition has been resolved. Such a determination might involve a reinspection, submission of reports by the facility, or completion of a corrective action.

RCRA

The RCRA Information System (RCRIS) does not use the term SNC to track compliance, but instead uses a numerical prioritization system for violations. IDEA combines this prioritization system with a violation resolved date to derive a SNC measure. Thus, Federal facilities are considered in SNC with RCRA for a given quarter if they:

- have a *Violation Priority* = 9 (High Priority Violation) and
- have no date in the violation *Actual Resolved Date* field or a date after the end of the last month of the quarter in question.

NPDES

Under the NPDES program, a facility may be classified as SNC if it has a violation of significant magnitude and/or duration to be among the Agency’s priorities for review and/or

response. IDEA classifies a NPDES facility as being in SNC for a given quarter if the facility: (1) is operating, (2) is a major facility, and (3) is classified with a *Noncompliance Status* of one of the following:

- "T" SNC for compliance schedule reporting;
- "S" SNC for compliance schedule violation;
- "E" SNC for effluent violations; or
- "D" SNC for non-receipt of a Discharge Monitoring Report.

CAA

The Aerometric Information Retrieval System (AIRS) tracks compliance status of CAA facilities; however, AIRS does not use the term SNC. IDEA classifies a Federal facility as being in SNC with CAA for a given quarter if for the last month of the quarter: (1) an enforcement lead has been determined or is pending, and (2) the facility has a *Compliance Status* of one of the following:

- "B" In violation with respect to emissions and procedural compliance;
- "W" In violation with respect to procedural compliance;
- "1" In violation for failure to have a schedule for return to compliance;
- "6" In violation for failure to meet a schedule for return to compliance;
- "7" In violation status unknown with regard to schedule for return to compliance.

In addition, the facility is still considered in SNC if at the end of the last month of the quarter in question, an enforcement lead has been determined and the facility changed its *Compliance Status* from either "1" or "6" to either "7" or "5", where "5" means "Meeting compliance schedule."

TSCA, FIFRA & EPCRA

Under TSCA, FIFRA, or EPCRA, SNC status is triggered by a violation for which the level of enforcement action is, at a minimum, an administrative complaint in accordance with the appropriate enforcement response policy. Drawing upon the National Compliance Data Base (NCDB) system, which tracks compliance for the aforementioned statutes, the IDEA system classifies a Federal facility in SNC for a given quarter if it:

- has a *SNC Indicator* = Y (Yes) and
- has no date on the violation *Closed Date* field or a date after the end of the quarter in question.

E. Regional Environmental Justice Contacts

Region I

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F. Regional Federal Facility Coordinators

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