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Appendix K - Community Relations Plan Format and
Sample Plan

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Originator Information

Name of Contact Person

Debbie Swickow

Mail Code

WH-546E

Telephone Number

382-2453

Lead Office



OERR



OUST



OSW



OWPE



AA-OSWER

Approved for Review

Signature of Office Director

Date

Title

Appendix K, Community Relations Plan Format and Sample Plan
in the (State Participation in the Superfund Program Manual, Volume 1)

Summary of Directive

Represents a carefully constructed consensus as to how to enable an extensive community relations program in the course of enforcement actions while at the same time perserving the integrity of the enforcement process. (This document is also being used with slight modification and Interim Guidance - Chapter VI of the Community Relations Handbook (see 9230.0-3-a)

Key words: Superfund, CERCLA, remedial program, state participation, cooperative agreements, community relations, enforcement, enforcement action

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

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Final



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Does It Supplement Previous Directive(s)? ☐ Yes ☐ No

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Review Plan



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Other (Specify)



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OGC



OSW



Regions



OPPE

This Request Meets OSWER Directives System Format

Signature of Lead Office Directives Officer

Nancy Lumsdaine

Date

10 Mar 86

Signature of OSWER Directives Officer

Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C 20460

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APR 4

MEMORANDUM

SUBJECT: Addendum to the manual State Participation in the Superfund Program -- Appendix K, "Community Relations Plan Format and Sample Plan"

FROM: Sam Morekas, Chief *S. Morekas*
State and Regional Coordination Branch
Hazardous Site Control Division

TO: Mailing List

The attached material included as Appendix K, "Community Relations Plan Format and Sample Plan", has been extracted from the publication, Community Relations in Superfund: A Handbook. This material reflects a revision of the interim version of the Handbook issued in September, 1983. This material has been rewritten to reflect additional years of experience in conducting community relations activities at Superfund sites. The emphasis of the revised material is on practical guidance for planning and implementing community relations activities rather than on the rationale for such activities.

While this material is still considered DRAFT guidance, it should be viewed as the Agency's official community relations policy and guidance document until final guidance is produced. The version of Appendix K you currently have should be discarded and be replaced with this attachment.

Attachment

CHANGES TO DATE

<u>Date/ Addendum #</u>	<u>Topic</u>	<u>Instruction</u>	<u>Location/Page</u>
6/22/84 #1	Site Closeout	. New pages	. Appendix F, Pages F-22 and 23
		. New page	. Appendix H, Page H-23
		. New pages	. Appendix P, Pages P-37-P-47
	Minority and Women's Business Reporting	. New page	. Appendix F, Page F-24
	Changes to IG Audit	. Change "... which must be sent within 120 days." to "... which must be sent within 90 days."	. Appendix C, Page C-12, first complete paragraph
		. Add, as the second sentence in the paragraph, "In addition, the Award Official will send the State a copy of the final audit report within 15 days of its receipt."	. Appendix C, Page C-12 first complete paragraph
		. Change "The response must be dispatched within 120 days..." to "The response must be dispatched within 90 days..."	. Appendix C, Page C-12 footnote
9/12/84 #2	Quality Assurance Project Plan	. New pages	. Appendix L, formerly reserved
9/28/84 #3	Revised Letter of Credit Procedures Provision	. Replacement pages	. Appendix F, Pages F-3 through F-6

CHANGES TO DATE (Continued)

<u>Date/ Addendum #</u>	<u>Topic</u>	<u>Instruction</u>	<u>Location/Page</u>
12/10/84 #4	Multi-Site Cooperative Agreements	<ul style="list-style-type: none"> . Replacement pages . Replacement pages . Replacement pages . Replacement pages . New pages . Replacement page . New pages . Replacement pages . New pages . Replacement page . New page . Replacement pages . New page . Change "...at quarterly intervals commencing at the start of the project." to "...within 30 days of the end of the Federal fiscal quarter." . New pages . Replacement pages . New pages . Replacement pages . Replacement pages . New pages 	<ul style="list-style-type: none"> . Table of Contents, Pages xiii through xvii . List of Exhibits, Pages xvii and xix . List of Acronyms, Pages a - through e . Chapter II, Pages II-1 through 6 . Chapter II, Page II-7 and Exhibit II-2 . Chapter III, Page III-17 . Chapter III, Pages III-18 through 27 and Exhibits III-10 and III-11 . Chapter IV, Pages IV-5 through IV-7 . Chapter IV, Pages IV-8 through IV-11 . Chapter V, Page V-7 and V-8 . Chapter V, Page V-9 . Appendix E, Pages E-1 through E-22 . Appendix E, Page E-23 . Appendix F, Page F-16, Section K, indented paragraph . Appendix F, Pages F-25 and F-26 . Appendix J, Pages J-1, J-2, and J-7 . Appendix J, Pages J-8 and J-9 . Appendix N, Pages N-1 through N-6 . Appendix P, Pages P-1, P-2, and P-47 . Appendix P, Pages P-48 through P-51

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<u>Date/ Addendum #</u>	<u>Topic</u>	<u>Instruction</u>	<u>Location/Page</u>
1/4/85 #5	Advance Match	. New pages	. New Appendix S, Pages S-1 through S-9
1/11/85 #6	Site Safety Plan Guidance	. New pages	. Appendix M, formerly reserved
8/2/85 #7	Obtaining Equipment Under a CERCLA Cooperative Agreement	. New pages	. New Appendix T, Pages T-1 through T-15
9/17/85 #8	Intergovernmental Review Procedures	. Replacement page	. Table of Contents, Pages xiii through xix
		. Replacement pages	. List of Exhibits, Pages xx and xxi
			. Appendix D, Pages D-1 through D-28
	State Cooperative Agreements for Pre-Remedial Activities	. New pages	. Appendix A, formerly reserved
12/18/85 #9	Action Memorandum Guidance	. Replacement pages	. Table of Contents, Pages xiii through xix
		. Replacement pages	. Appendix B, Pages B-1 through B-9
12/20/85 #10	Model Statement of Work for a Remedial Investigation/Feasibility Study	. Replacement pages	. Table of Contents, Pages xiii through xix . Appendix E, Pages E-1 through E-21
12/20/85 #11	Site Safety Plan Guidance	. Replacement pages	. Table of Contents, Pages xiii through xix
		. Replacement pages	. Appendix M, Pages M-1 through M-28
1/31/86 #12	Quality Assurance Project Plan	. Replacement pages	. Table of Contents, Pages xiii through xix . Appendix L, Pages L-1 through L-12
3/5/86 #13	Superfund Supplement Guidance	. Replacement pages	. Table of Contents, Pages xiii through xix . Appendix P, Pages P-1 through P-16

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3/14/86 #14	Audits of Cooperative Agreements	. Replacement pages	. Table of Contents Pages xiii through xix
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		. New pages	. Chapter IX, Pages IX-1 through IX-24
3/24/86 #15	Community Relations Plan	. Replacement pages	. Table of Contents, Pages xiii through xix
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APPENDIX K
COMMUNITY RELATIONS PLAN FORMAT
AND SAMPLE PLAN

PURPOSE

This appendix has been provided to assist Regional personnel -- especially Remedial Project Managers (RPMs) and Regional Superfund Community Relations Coordinators (RSCRCs) -- and State staff -- such as State Project Officers (SPOs) and State Community Relations Coordinators (SCRCs) -- in developing Community Relations Plans (CRPs) for remedial sites.

BACKGROUND

The Superfund community relations program is a two-way, site-specific program for communication and information exchange that is implemented for every remedial response initiated under CERCLA. It must involve citizens from the affected communities and representatives from the Federal, State, and local agencies taking part in the response. The program's goal is to keep local citizens informed about planned and on-going remedial activities while also providing them an opportunity to comment on and supply information about the response.

Community relations activities may be the responsibility of either EPA or the State, depending upon which agency is taking the lead for the remedial response activities in question. For State-lead projects, this responsibility will be determined during negotiation of the Cooperative Agreement application covering the project, and may be assumed either by EPA or the State. For Federal-lead projects, EPA Regional community relations staff, with the assistance of RPMs, will conduct the community relations program. In either case, a CRP must be developed and implemented for each Superfund remedial project.

A CRP is the planning, management, and budget document that specifies community relations activities to be undertaken at a site. As such, it is an essential and integral part of remedial response activities. The CRP, however, must be based on interviews conducted in the community with interested State and local officials, community residents, and media representatives. Only after obtaining a

firsthand understanding of the community issues, suggested techniques for involvement, and information needs can a CRP be written to reflect the concerns of the community in question (see Section 2 of this appendix).

After completion of the community interviews and careful consideration of the information gathered, Superfund community relations staff will have sufficient information to prepare a draft CRP. The trigger point for preparing the draft CRP should be the onset of EPA and State negotiation of a remedial response agreement for the first project at the site in question. A CRP should include the following elements:

- . Overview of Community Relations Plan
- . Capsule Site Description
- . Community Background
- . Highlights of Community Relations Program for the Site
- . Community Relations Techniques and Timing
- . Appendices.

A draft plan must be submitted along with the draft agreement covering the first phase of remedial planning -- either a Cooperative Agreement application or a draft Memorandum of Understanding (MOU). The plan will form the basis for the complete CRP, which should be submitted with the final agreement package. If the project is to be undertaken in response to a State letter of request, a complete CRP must be developed and approved prior to the initiation of remedial activities at the site.

Before a remedial design or remedial action is implemented at the site, the responsible agency must revise the CRP to reflect the changing needs and concerns of the community and the additional requirements of the new project. The revised CRP must be submitted with either the Cooperative Agreement application or the Superfund State Contract (SSC) that is negotiated to cover this phase of remedial response. A public notice and fact sheet should also be prepared upon completion of the final engineering design. More specific procedures for preparing the CRP and background on the Superfund community relations

program in general can be found in Community Relations in Superfund: A Handbook. Refer to section 300.67 of the National Oil and Hazardous Substances Pollution Contingency Plan for specific regulatory guidance.

APPENDIX SUMMARY

For the use of concerned State and EPA Regional staff, this appendix contains the following guidance:

- . On-site discussion guidance document
- . CRP sample format
- . Sample CRP.

The activities presented in Section 2, Community Relations Plan Sample Format, are general guidelines for preparing a CRP. In practice, however, needs of individual CRPs will vary. Every site presents special problems and every community has unique needs and expectations to consider. For this reason, a sample CRP has been provided in Section 3. Staff members preparing CRPs should tailor plans to reflect the needs of the site and the situation in question.

1. INTRODUCTION

This document provides guidance for planning, conducting, and evaluating on-site discussions with concerned citizens and local officials at Superfund sites. These discussions provide the basis for assessing the nature and level of citizen concern at the site -- a requirement for all non-emergency Superfund response actions. Tasks described in this guidance may be performed by EPA regional personnel, state response staff, or EPA-supervised contractors.

Community relations activities must be based upon information derived from on-site discussions with concerned citizens and local public officials to ensure that EPA or the state responds to local concerns and major issues. Results of the on-site discussions should be incorporated into a community relations plan (CRP) -- the planning, management, and budget cornerstone of the community relations program for each site. Activities specified in the CRP are tailored to the level and nature of community concerns at the site.

These on-site discussions are not a survey of citizen opinion. Rather, they are information meetings conducted to provide community relations staff with the background information necessary to understand the site's history from the community's perspective, to identify concerned citizens, officials, and organized groups, and to evaluate the level and nature of citizen concern. This information is indispensable in preparing the CRP. The discussions also serve as the initial public input into response plans. Concerns identified in these discussions may be taken into account in developing technical response actions.

Information derived from on-site discussions may also be useful to the enforcement staff. At sites where enforcement staff are serving responsible party cleanup, on-site discussions should be conducted and evaluated by the time notice letters are sent out, so that enforcement personnel may be informed of community concerns before entering negotiations with responsible parties.

Thus, these discussions are of critical importance in designing community relations programs that are tailored to a particular community. In turn, they can help in the design and implementation of response actions (including enforcement actions) that meet the community's special needs. They must, however, be conducted with care and discretion.

Section 2 of this document describes how to plan and prepare for on-site discussions. Section 3 offers a set of procedures that may be useful for conducting the discussions. Finally, Section 4 provides a framework for assessing the results of the discussions.

2. PLANNING AND PREPARATION

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

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

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

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

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

Performing these four steps in the order in which they are presented here should help maximize the efficiency with which this first phase of the planning process is carried out.

At most sites, some or all of the following types of individuals and groups may have concerns about the site or can provide valuable perspective on site issues. They should, therefore, be included among those to be considered for on-site discussions:

- Persons interested in the site, i.e., persons living in close proximity to the site and nearby property owners;
- State agency staff, such as health, environmental protection, or natural resources department officials;
- Local and state elected officials, such as the mayor, council members, local state legislators, or attorney general;
- Staff at Congressional or state legislators' district offices;
- County planning and health officials;
- Representatives of ad hoc citizen groups organized because of site issues;
- Local business representatives (e.g., from the Chamber of Commerce);
- Local civic groups;
- Neighborhood associations;
- Local chapters of environmental groups;
- Local educators and school administrators; and
- Media representatives.

It is important to encourage those members of the community who have been the most active with respect to the site to raise their concerns in on-site discussions.

B. Contacting Interested Officials, Citizens, and Groups

Once the background activities of the first phase of the planning process are completed, community relations staff should draw up a list of persons to be contacted at the site and make arrangements to meet with them. In phoning

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

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

C. Eliciting Information from Individuals and Groups

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

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

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C. Eliciting Information from Individuals and Groups

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

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

EXHIBIT 1

EXAMPLES OF QUESTIONS TO ASK IN ON-SITE DISCUSSIONS

- (1) When did you first become aware of the release of hazardous substances at the site?
- (2) How would you characterize the problems at the site?
- (3) What contacts have you had with local, state, EPA and other officials about the site?
- (4) What are your major concerns related to the site?
- (5) What activities have you participated in, sponsored, or organized concerning the site?
- (6) How can EPA or the state best provide you with information concerning response activities? Would you like to be included on a mailing list?
- (7) What kind of information would be most useful to you (e.g., technical information, status reports on cleanup activities)? How frequently would you like to receive a progress report or fact sheet?
- (8) Is there anything you wish to mention that we have not yet discussed?
- (9) Can you suggest other individuals or groups that EPA or the state should contact for additional information or to identify other types of concerns?

3. CONDUCTING ON-SITE DISCUSSIONS

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

Once the discussions have begun, staff should try to:

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

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

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

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

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

At the end of each discussion, staff should ask the citizen or official if he or she is interested in participating in future briefings, workshops, and meetings, and receiving prior notification of such activities by mail. In addition, the names of other individuals to contact in the community should be requested. After each discussion has been concluded, staff should write up a summary of the discussion as soon as possible.

When all the meetings have been held, staff should prepare a final list of all interested officials and citizens with pertinent titles and affiliations, addresses, and phone numbers. This list eventually will be included in the community relations plan for the site.

4. EVALUATING DISCUSSIONS

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

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

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

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

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

were held do not need to be presented in the plans unless they are directly relevant to the design of a community relations program. Descriptions of the personal backgrounds or political beliefs of individuals are unnecessary. Accusations of conflict of interest or of a complete absence of credibility among certain officials or agencies are serious charges that are not appropriate subjects for CRPs. Such charges should be directed to the proper EPA or state staff according to the standard procedures in such cases. In short, the information gathered in the on-site discussions should be carefully weighed and presented as objectively as possible. No CRP should become an issue itself in the community.

By planning, conducting, and evaluating the discussions in accordance with this guidance, community relations staff should gain a clear understanding of the level and nature of community concern at a site. Community relations staff should then be able to prepare an effective CRP and to tailor communications activities at a site to the needs and concerns of local citizens and officials.

APPENDIX A

SUGGESTED FORMAT FOR COMMUNITY RELATIONS PLANS

A. Overview of Community Relations Plan

Purpose: This section should provide a general introduction to the document by briefly stating the purpose of the community relations plan and the distinctive or central features of the community relations program planned for this specific site. It should also note any special circumstances of the community and the site that the plan has been designed to address. This statement should not be a repetition of general program goals (e.g., "Keep the community informed").

Length: One paragraph to several pages (will vary from site to site).

B. Capsule Site Description

Purpose: This section should provide a reader unfamiliar with the site with the historical, geographical, and technical details necessary to understand how the site became listed on the NPL.

Suggested topics: Site location and proximity to other landmarks; history of site use and ownership; date and type of release; nature of threat to public health and environment; and responsibility for site (e.g., state or federal lead).

Length: One page.

C. Community Background

Purpose: This section should provide an understanding of the community and its involvement with the site. It should be divided into three parts:

1. **Community Profile:** a discussion of the economic and political structure of the community, and key community issues and interests.
2. **Chronology of Community Involvement:** a discussion of how the community has reacted to the site in the past, actions taken by citizens, and attitudes toward government roles and responsibilities. This chapter should also include a discussion of actions taken by any government agencies or government officials, such as public meetings or information distributed.
3. **Key Community Concerns:** an analysis of the major concerns of the community regarding the risks posed by the site or the remedial process used to address those risks. A suggested approach is to break down the analysis by community group or segment (i.e., public/environmental interest groups; nearby residents; and elected officials).

In all three sections, but particularly in the last, the focus should be on the community's perceptions of the events and problems at the site, and not on the technical history of the site.

Length: May vary between three to seven pages, depending on the history and level of community involvement in the problems posed by the site.

D. Highlights of Community Relations Program for the Site

Purpose: This section should provide concrete details on community relations approaches to be taken at the site. These approaches should follow directly and logically from Section C's discussion of the community and its perceptions of the problems posed by the site. This section will not restate the goals or objectives of conducting community relations at Superfund sites. Instead, it will develop a strategy for communicating with a specific community.

Suggested topics:

- Resources to be used in the community relations program (e.g., local organizations, meeting places);
- Key individuals or organizations which will play a role in community relations activities;
- Areas of sensitivity that must be considered in conducting community relations.

E. Community Relations Techniques and Timing

Purpose: This section should state what community relations activities will be conducted at the site, and when they must be implemented. This section should also suggest additional techniques that might be conducted at the site, depending on circumstances as the response action proceeds, and when in the remedial process they are likely to be most effective.

Length: Two to three pages. Matrix format may be suitable for this section.

Appendices

- Mailing List of Interested Parties and Key Contacts*
- Suggested Locations of Meetings and Information Repositories

*(Note: Names and addresses of individuals should not be included in the community relations plan that is made available in the information repository for public review. Names and addresses should, however, be compiled for a mailing list as part of the Community Relations Coordinator's (CRCs) files.)

APPENDIX A

SAMPLE COMMUNITY RELATIONS PLAN

The following community relations plan for the Sludge Pond site is intended to illustrate the suggested format and content of community relations plans, as discussed in Chapter 3 of this Handbook. While the plan is based on actual community interviews conducted for a Superfund remedial site, names, locations, and technical details have been changed so that the plan can be viewed as an illustration only.

* * * * *

COMMUNITY RELATIONS PLAN

SLUDGE POND SITE, WOODBURY, CONNECTICUT

1. OVERVIEW OF COMMUNITY RELATIONS PLAN

This community relations plan identifies issues of community concern regarding the Sludge Pond Superfund site in Woodbury, Connecticut, and outlines community relations activities to be conducted during the remedial investigation and feasibility study (RI/FS) of the site. In general, community concern about the site is low; having known for almost forty years that the site was a source of contamination, residents appear more-or-less resigned to its presence in their community. The initiation of remedial activity at the site, however, is likely to reawaken the interest and concern of the community. An effective community relations program for this site should therefore prepare for this potential revival of community interest and attempt to educate, without alarming, residents so that they can better understand the Superfund remedial process. In particular, the community relations program for Sludge Pond should enlist the support and cooperation of the town and county officials of Woodbury. These individuals have a long-standing familiarity with the area and its residents, and hold visible positions of responsibility within the community; therefore they should be considered as a key resource in the effort to communicate openly and effectively with the townspeople of Woodbury.

This draft community relations plan has been prepared to aid EPA in developing a community relations program tailored to the needs of the community affected by the Sludge Pond site. EPA conducts community relations activities to ensure that the local public has input to decisions about Superfund actions and is kept well-informed about the progress of those actions. The plan is divided into the following sections:

- Capsule Site Description
- Community Background

- Highlights of the Community Relations Program for Sludge Pond
- Community Relations Activities
- Attachments: Site Mailing List and Suggested Locations for Meetings and Information Files

The information in this plan is based primarily on discussions conducted in Litchfield County, Connecticut, in August 1985, with the District Health Department, officials from the Litchfield County Office of the Connecticut Department of Environmental Protection (DEP), the first selectman of Woodbury Township, a Litchfield County Commissioner, and residents of Woodbury and Watertown Townships. The "Preliminary Investigation Report/Lewis Iron Works Site," prepared by contractors to Eastern Manufacturing Company, also provided valuable information.¹

The U.S. Environmental Protection Agency (EPA) Region I Office has lead responsibility for managing this RI/FS; the EPA Region I Office of Public Affairs will oversee all community relations activities at the site. The Office of Community Involvement in the Ground Water Quality Division at DEP will play a major role in implementing community relations activities.

2. CAPSULE SITE DESCRIPTION

Site History

The Sludge Pond site is located on a forty-acre tract of land, one mile south of the Town of Woodbury on Route 6. (Exhibits 1 and 2 illustrate the location of the site within the state, and surrounding geographical landmarks.) To the north of the site is Tanner Lake, used for recreational fishing and swimming. The closest residences are approximately one-quarter mile away, located to the northwest and west across Route 6.

For nearly sixty years from 1886 to 1945, the site was the manufacturing location of Lewis Iron Works, a major producer of charcoal, pig iron, and organic chemicals. Liquid tar residues from chemical processing were discharged into a two-acre depression on site, giving to the area its current name of "Sludge Pond." Lewis Iron Works shut down its chemical operations in early 1944, and a year later, ceased operations entirely. Among the current owners of the site property are Eastern Manufacturing, whose nearby plant produces automotive parts; the Wilson Lumber Company; and the township of Woodbury, which operated an eight-acre municipal landfill adjacent to the Sludge Pond site from 1961 to 1969.

¹Interested readers are advised that this, as well as other technical reports (such as the RI/FS work plan), will be made available at the information repository to be established within Woodbury. These reports will give full details of the type and extent of the problem found at Sludge Pond.

Exhibit 1
SITE LOCATION MAP
SLUDGE POND SITE
LITCHFIELD COUNTY, CONNECTICUT

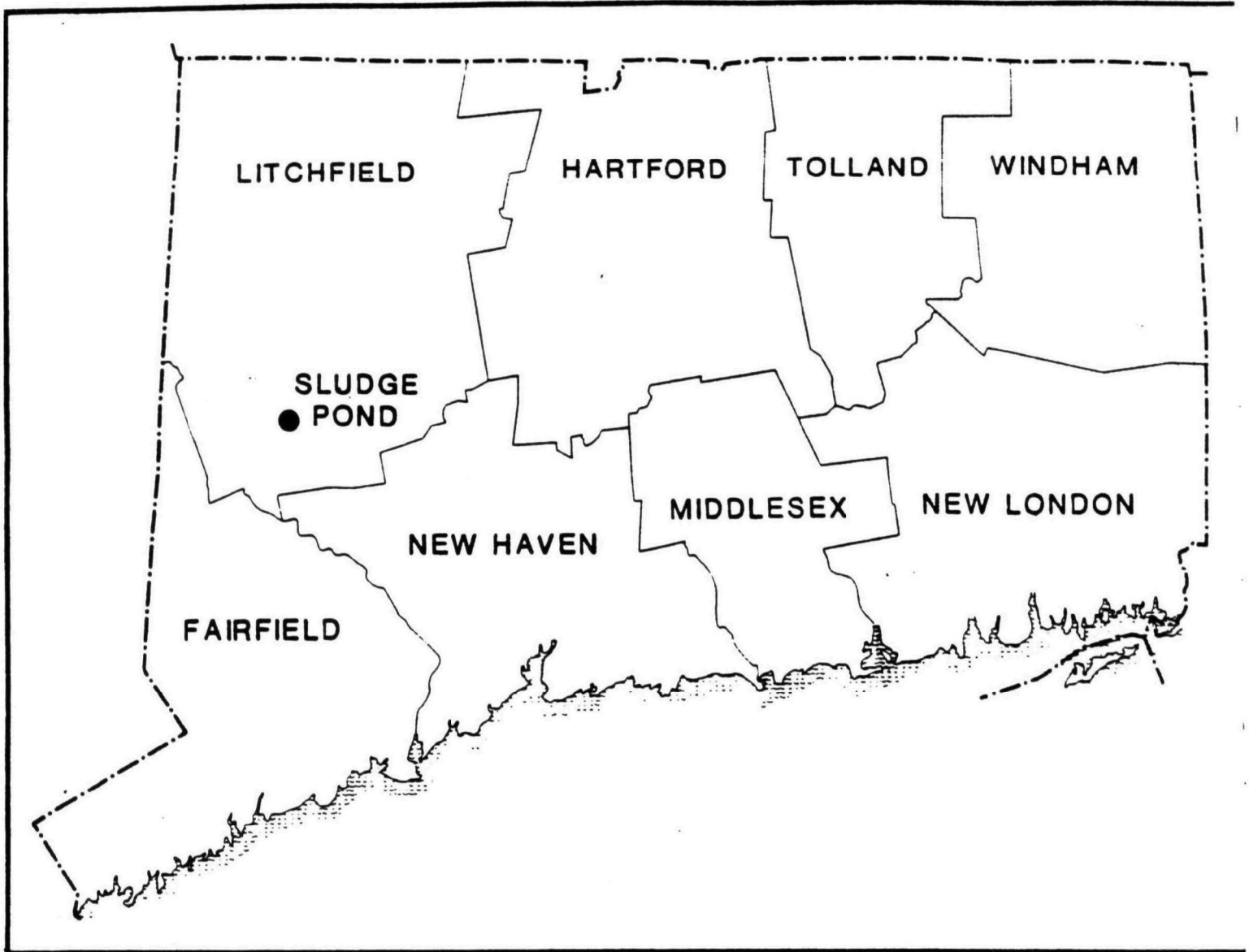
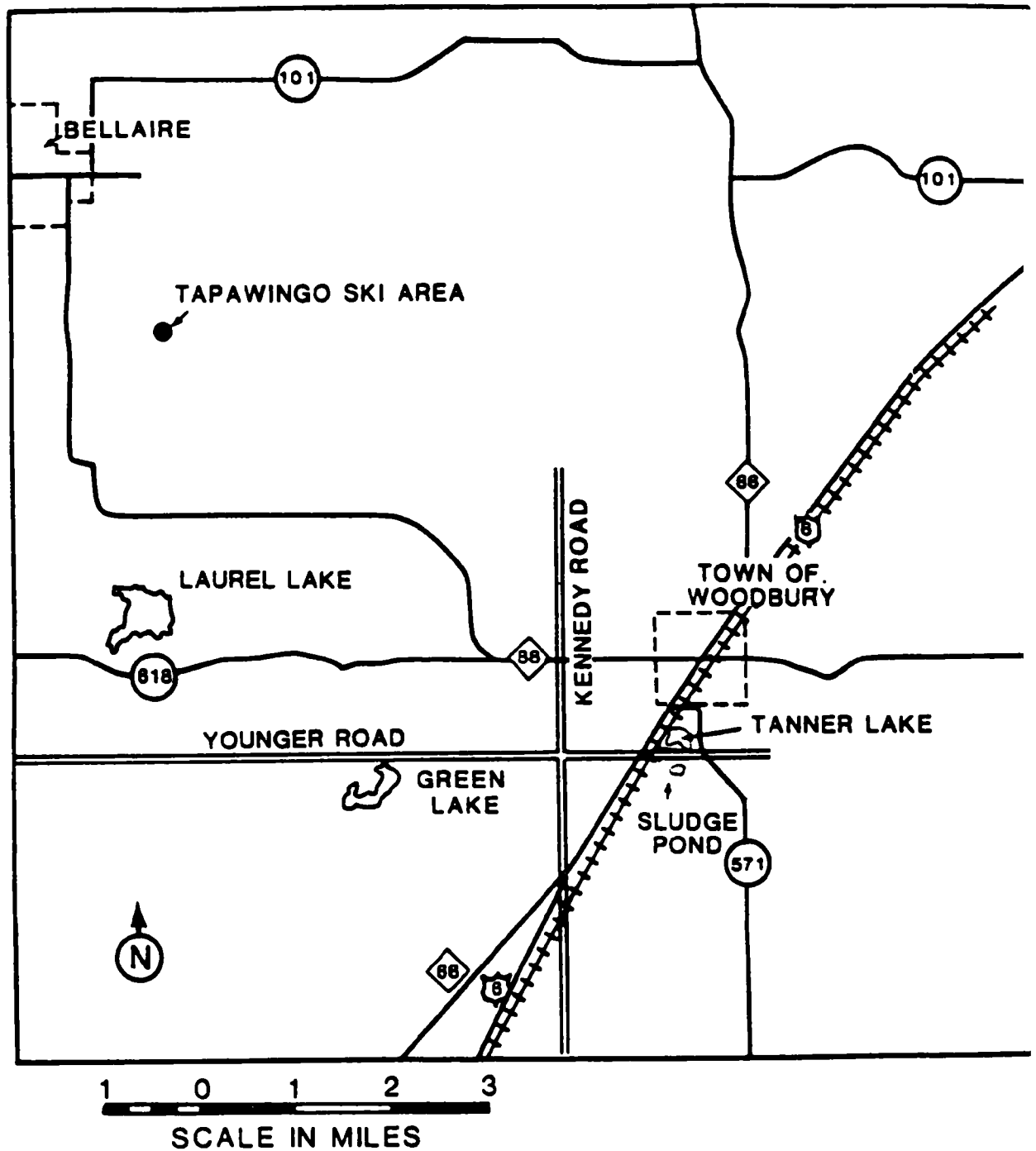


Exhibit 2
SLUDGE POND SITE VICINITY MAP



In the late 1940s, shortly after the closing of the Iron Works, residents as far away as three miles from the site reported that their well water had a chemical taste and bad odor." Samples taken by the Connecticut Geological Study in 1949 indicated that phenol-contaminated ground water had affected eight private wells, located to the west and northwest of Sludge Pond. In the 1960s, the surface sludges on site caught fire and burned out of control for several weeks.

Limited water sampling conducted since 1980 has confirmed the 1940 findings of phenol in the area ground water. In addition, DEP found evidence of heavy metals in Sludge Pond in 1980. This evidence of heavy metal contamination was not, however, confirmed by monitoring samples taken by EPA's Field Investigation Team in 1982, or by on-site testing conducted by Eastern Manufacturing 1983. After private wells were tested by DEP and the District Health Department in 1980, residents were told that their water was drinkable.

Sludge Pond was proposed for the National Priorities List (NPL) in December 1982. The site has recently been designated a Fund-lead site for the RI/FS, although enforcement proceedings are underway against Eastern Manufacturing as a potentially responsible party.

3. COMMUNITY BACKGROUND

a. Community Profile

The town of Woodbury, named for the abundance of trees in the area, developed in the 1820's as settlers journeyed to western Connecticut in search of farm land. However, because of the town's fairly remote location, industry did not begin to develop in the area until about a half-century later. In 1882, George Lewis - an area entrepreneur - erected a blast furnace for the manufacture of charcoals, and the Lewis Iron Works soon became the area's largest employer.

Several of the Woodbury residents interviewed for this plan recalled the days when their relatives or neighbors worked at the Iron Works, and old photographs of the company's vast lumber stocks and furnace can still be seen in the local library and on the walls of the town office building.

Since the closing of the Iron Works, major sources of employment in the area have included light industry and farming. Local craft industries dating from the early nineteenth century continue to flourish in the area, as do antique stores and clock shops. Dairy and poultry farms occupy a significant portion of the land in Litchfield and Berkshire counties.

In general, however, Woodbury Township remains a quiet, rural area, somewhat insulated from the industrial development to the south and east. Judging from the experience of individuals interviewed for this plan, many members of the community have been long-time residents in the area, and the Township's small population (7,000 reported in the 1980 Census) has meant that local officials know, and are known by, most of the area's residents. There also seems to be a significant number of senior citizens in the community;

discussion of aging issues and provision of facilities for the elderly have been prominent concerns in the community, and according to the Township Clerk, a central meeting place in the area is the Litchfield County Senior Center.

b. Chronology of Community Involvement at the Sludge Pond Site

Local officials have described community reaction to the proximity of an NPL site as "quiet," particularly in the past year. The District Health Department receives only infrequent inquiries about the safety of private well water which, according to users, is a brownish-orange color and stains bathroom fixtures and laundry. The last call was received at the beginning of the summer (1985) from a prospective home builder who was concerned about the condition of the ground water directly south of Sludge Pond. Because the groundwater flow from the site runs west -- and, in the opinion of some local officials, is confined to a narrow finger of an aquifer -- the Health Department assured the caller that his property was not threatened by contamination from the site.

The level of community concern, while never high, was perhaps at its peak in the early 1980s, when DEP analyzed sludges from Sludge Pond and sampled water from a number of private wells. Early in 1980, a local resident living on a farm with contaminated well water wrote to the District Health Department after reading an article in the Waterbury Republican about the suspected hazards at the site. She was concerned because guests could not drink her water, though she herself was accustomed to its distinctive taste. When interviewed, this same resident stated that she and her husband knew about the problems with their well when they purchased their house and farm, and in fact were able to buy the property at a reduced price because of the discolored water.

Also in 1980, the Township of Woodbury took over and began rebuilding a town water system from an independent water company. A major part of this project, which was financed through loans and grants from the Farmers' Home Administration, was the replacement of leaking wooden main pipes. Some community members also attempted to obtain a Health Department grant to have the water mains extended to the residents with private wells who had experienced bad well water. According to a County Commissioner, to obtain funding from the Health Department for this extension, it was necessary to demonstrate that the water was not fit for drinking. Because this demonstration was never made, the Township was unable to finance an extended water system. While affected citizens could conceivably put in their own connecting pipes to tap into the town water system, this option appears to be well beyond the means of individual residents.

Shortly after the site was listed on the NPL in December 1982, the Litchfield County Herald ran an article announcing Sludge Pond as one of "EPA's 400 worst." Though several residents could recall the article, the classification of Sludge Pond as a Superfund site did not particularly alarm residents or motivate them to take organized action. No community groups have been formed to participate in the investigation of the site, or to voice an opinion as to how the site should or could be addressed. In general, affected

residents have dealt with the problem of contaminated well water in fairly quiet and individual ways: some carry bottles of town water home for drinking, and take extra measures (e.g., filtering and bleaching) to prevent staining of laundry. From the point of view of local officials, a far more urgent issue is the potential closure of the Litchfield-Berkshire municipal landfill. DEP has found evidence of contamination in monitoring wells at the landfill, and is therefore seeking to close the area. Because closure would mean that area waste would have to be transported further away, local officials are particularly concerned that some citizens will resort to dumping refuse on back roads rather than paying the higher transporting fees for waste removal.

c. Key Community Concerns

Currently, as throughout the past five years, there seems to be a fairly low level of community concern about contamination from Sludge Pond. This low level can be accounted for by several factors:

- Citizens have lived with the knowledge that Sludge Pond was contaminated for a long period of time.
- Citizens view the contamination primarily as a nuisance, but not as a public health hazard. Residents rely on the fact that DEP and the Health Department have never declared the water undrinkable as evidence that the water is safe to drink.
- Only a few residents are affected and their houses are scattered over farm land about two miles northwest from the site. In conversations with community members, about six families were mentioned as having had problems with their private wells. At least two of these families have now moved to homes on the village water supply; another had problems only when he installed a well before being connected to the town water system.

It is important, however, not to mistake the current low level of community concern about Sludge Pond for lack of interest. Citizens are not indifferent to the environmental problem posed by Sludge Pond; their attitude might be more accurately characterized as resigned. In their view, the problem is intractable. According to one resident, because such large quantities of sludge were once deposited on site, it would literally take moving a small mountain to eliminate the years' accumulation of waste. Furthermore, many residents consider their community too rural and economically insignificant to command federal attention or funds for a cleanup.

The initiation of the Sludge Pond RI/FS is bound to change this attitude of resignation. The arrival on site of investigation teams, and discussion of solution alternatives during the feasibility study may cause people to reconsider that perhaps the problems at Sludge Pond are capable of a solution and worthy of being addressed. In developing a community relations program

for this site, it is important to anticipate this potential for renewed community interest. The following kinds of concern, voiced individually and in a low key manner during community interviews, are likely to become more visible and pressing during the RI/FS:

- **Property Values:** Some residents have suffered losses in the market value of their property as a result of groundwater contamination in the area. When one resident put his property up for sale, he was told by the realtor that the listing had to carry a statement that his well water was contaminated. He has been unable to sell his property, despite a substantial decrease in his asking price, and has had to go into debt to purchase a new home.
- **Inconvenience:** Contaminated well water has inconvenienced affected residents in a number of ways: they must carry bottled water to their homes from the homes of friends or relatives on village water, and take extra measures to get their laundry clean. There is also the problem of the water having a bad odor. One resident claims her plumbing has been affected by the contaminants in her water. One resident did complain of a rash that did not heal while she was using private well water, but in general it appears that citizens regard the contamination of ground water as a nuisance, rather than a health hazard.
- **Follow-up with community after site work:** Over the past five years, technical teams from EPA, DEP, the District Health Department, and Eastern Manufacturing have been in the area to sample site monitoring wells and private wells and install a fence around the site. Some residents complained that there was no adequate follow-up to these visits, or explanation as to what had been the purpose or results of testing. Owners of private wells where samples had been taken did receive copies of laboratory slips listing the levels of various contaminants. However, they were not familiar with the types of contaminants being tested, nor did they understand how to interpret the detected levels of these contaminants. Local officials were also irritated that they had not been informed of the results of sampling activities.
- **Financing and conducting remedial work:** At least one local official and one resident wondered how the investigation and possible cleanup of Sludge Pond would be financed. The official's concern was that the township could not afford remedial action at the site; at the same time, he did not consider it fair that

Eastern Manufacturing, as a potentially responsible party, might be liable for remedial costs since the company had not created Sludge Pond. In general, community members do not appear to be knowledgeable about the Superfund remedial or enforcement process, or its technical and legal requirements. For example, one elected official who had witnessed a technical crew on site found it difficult to understand why sampling had to be delayed until EPA-approved bottles were obtained. He was also somewhat impatient that EPA would be initiating a remedial investigation of the site, when the site had already been investigated a number of times.

4. HIGHLIGHTS OF THE COMMUNITY RELATIONS PROGRAM AT SLUDGE POND

The community relations program at the Sludge Pond site should be designed to provide an opportunity for the community to learn about and participate in the Superfund remedial process, without disrupting the community's confidence that the site poses no new or immediate hazards. To be effective, the community relations program must be gauged according to the community's need for information, and its interest and willingness to participate in the remedial process.

The community relations program at the Sludge Pond site should take the following approaches:

1. Enlist the support and participation of local officials in coordinating community relations activities. Appropriate officials to involve in a community relations program include the Town First Selectman; the County Commissioner for Litchfield, and District Health Department officials. These officials are visible and trusted leaders in the community, and are therefore an invaluable resource in EPA's effort to understand and monitor community concern. To gain the support of local officials, it is essential that they be regularly and fully informed of site activities, plans, findings, and developments.

2. Provide follow-up explanations about sampling and test results to area residents. Concise and easily-understood information should be available to all area residents on the schedule of technical activities, their purpose, and their outcome. Where information cannot be released to the public -- either because of quality assurance requirements, or the sensitivity of enforcement proceedings -- a clear and simple explanation as to why the information must be withheld is in order. Community relations staff should also, however, attempt to identify special situations or concerns where more specialized information may be required, or where certain types of information is desired by single individuals or groups. In particular, owners of property where samples are taken should be provided with follow-up explanations of what was done and found on their land. Finally, to ensure that inquiries from the community are handled efficiently and consistently, a single EPA contact should be established for the site.

3. Educate area residents and local officials about the procedures, policies, and requirements of the Superfund program. To dispel some of the current confusion about EPA's purpose and responsibilities at the site, an effort should be made to circulate basic information to the community describing the Superfund process. Questions asked by community members during on-site discussions indicate that the following areas could be given special emphasis: scoring and ranking of NPL sites; the schedule and stages of an RI/FS; and the criteria used to select a cleanup alternative.

4. Let the townspeople "set the pace" for the community relations program. Staff should be aware that federal involvement in local issues has not always been well-regarded by townspeople. Federal, and even state, programs are seen as excessively bureaucratic and insensitive to the realities of local government budgets and planning. It is important, therefore, not to "overdo" or overplan community relations activities in a way that might discourage the community from participating. Large, formal meetings will almost certainly be inappropriate for this community, as will activities that are planned without the consultation of key local officials.

5. COMMUNITY RELATIONS ACTIVITIES

The following activities are required for the Sludge Pond site community relations program. Exhibit 3 illustrates the timing of each activity during the remedial schedule for the site.

1. A public comment period on the draft feasibility study report. A minimum three-week public comment period must be held to allow citizens to express their opinions on EPA's preferred alternative for remedial action at Sludge Pond. Community input should be encouraged at this point by informing citizens that their opinions will be considered by EPA in the ultimate decision on how the site will be addressed during remedial design and remedial action.

2. Preparation of responsiveness summary. This document is required as part of the Record of Decision for the site. It should summarize public concerns and issues raised during the public comment period on the draft feasibility study. In addition, the responsiveness summary documents responses made by EPA and the State to these concerns.

3. Revision of Community Relations Plan. Once the Record of Decision has been issued for Sludge Pond, this community relations plan should be revised to outline community relations activities appropriate to the remedial design and remedial action (RD/RA) phase. The revision of the community relations plan should:

- Update facts, and verify the information included in this community relations plan prepared for the RI/FS.
- Assess the community relations program to date, and indicate whether the same or different approaches will be taken during RD/RA.

- Develop a strategy for preparing the community for a future role during RD/RA and ongoing operation and maintenance.

It is advised that community interviews be held prior to the revision of the Sludge Pond community relations plan.

In addition to these basic requirements for a community relations program at Sludge Pond, a number of activities will be undertaken to ensure that the community is well informed about site activities and has the opportunity to express their concerns. Activities, and their approximate timing, are as follows:

1. Establish and maintain information repositories: Fact sheets, technical summaries, site reports (including the community relations plan), and information on the Superfund program will be placed in the information repositories. An information repository will be located at the Woodbury Public Library.
2. Establish an information contact: A technical or community relations staff person will be designated to respond directly to public inquiries regarding site activities. In contacts with the press, this person should coordinate with EPA Community Relations staff and the DEP Community Involvement staff.
3. Hold meetings with local officials, and contact them periodically by phone: The County Commissioner and the town's First Selectman have indicated that they want to be kept informed about site plans and findings. Meetings with local officials should include both EPA and DEP officials and should be held at the following technical milestones:
 - Completion of the final work plan;
 - Completion of the draft RI/FS report; and
 - Prior to initiation of remedial action.
4. Conduct informal meetings with residents: A meeting with residents is advisable prior to the RI, and before any on-site activities involving use of earth-moving devices or other heavy machinery. The meeting should include interested citizens, the EPA Remedial Project Manager, the DEP Community Involvement Coordinator and REM II technical and community relations contractor assistance as necessary.
5. Prepare fact sheets and technical summaries: One fact sheet might be released at the beginning of the remedial investigation to inform area residents and other interested citizens about EPA's site plans and the procedures of the Superfund program. Another fact sheet (including a technical summary) might be prepared to explain the findings of the remedial investigation and to outline each of the remedial alternatives considered for the Sludge Pond site. A detailed description of the Agency's preferred remedial alternative(s) should also be provided.

6. Provide news releases to local newspapers: Prepared statements might be released to local papers, such as the Litchfield County Herald and the Waterbury Republication to announce discovery of any significant findings at the site during the RI/FS, or to notify the community of any public meetings. Additional news releases are advisable at the following milestones:

- Upon completion of the draft FS report; and
- Prior to initiation of remedial action.

Addresses and phone numbers of local newspapers are included in Appendix A.

7. Hold public meeting: A public meeting held during the public comment period would provide an opportunity for EPA to answer citizens' questions directly and to receive the recommended remedial alternative. According to community residents, as few as twenty or as many as two hundred community residents might attend such a meeting. Planning should therefore be flexible. A suggested location for this meeting is the auditorium of one of Woodbury's public schools (Elementary, Middle or High School.) The meeting should be coordinated with the Woodbury and Watertown Township Officers.

EXHIBIT 3

TIMING

Community Relations Technique	Completion of the Work Plan	During Remedial Investigation	Completion of the Remedial Investigation	During the Feasibility Study(FS)	Completion of the Draft FS Report	Completion of the Final FS Report	Initiation of Remedial Action
1) Information Repository	X	-----	-----	update as needed	-----	-----	X
2) Establish Information Contact	X	-----	-----	update as needed	-----	-----	X
3) Meetings w/ Local Officials	X				X		X
4) Telephone Contact w/ Local Officials	X	-----	-----	provide as needed	-----	-----	X
5) Informal Discussion w/ Residents		X					
6) Fact Sheets/Technical Summaries		X	X		X		
7) News Releases	X	-----	-----	provide as needed	X		X
8) 3-Week Public Comment Period					X	-----X	
9) Public Meeting					X		
10) Responsiveness Summary						X	
11) Revise CRP						X	

* * * March 1986 Draft * * *

ATTACHMENT A
LIST OF CONTACTS AND INTERESTED PARTIES

A. Federal Elected Officials

(names and addresses) (phone)

B. State Elected Officials

(names and addresses) (phone)

C. Local Officials

(names and addresses) (phone)

D. U.S. EPA Region I Officials

(names and addresses) (phone)

E. State and Local Agencies

(names and addresses) (phone)

**F. Community Organizations, Environmental Groups, and
Citizens' Groups***

(names and addresses) (phone)

G. Newspapers

(name and address) (phone)

*Names and addresses of private citizens should not appear in the community relations plan that is released to the public.

ATTACHMENT B
LOCATIONS FOR INFORMATION
REPOSITORY AND PUBLIC MEETING

Information Repository:

Woodbury Public Library (203) 246-4567
202 W. State Street
Woodbury, Connecticut 06798

Hours: Mon-Fri 9 am-9 pm
Sat 9 am-5 pm
Sun 12 noon-5 pm

Meeting

Woodbury Public Schools (203) 246-1234
Elementary School
231 Chapel Street
Woodbury, Connecticut 06798

Middle School (203) 246-2468
105 E. Main Street
Woodbury, Connecticut 06798

High School (203) 246-1359
414 W. Main Street
Woodbury, Connecticut 06798

Woodbury Township Office (203) 246-4568
(basement of Woodbury Public Library)
202 W. State Street
Woodbury, Connecticut 06798