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CERCLIS

**COMMUNITY RELATIONS PLAN
CARTER CARBURETOR SITE
ST. LOUIS, MISSOURI**

JULY 1997

**Updated March 2011
as
COMMUNITY INVOLVEMENT PLAN**



U.S. Environmental Protection Agency

Region 7

Office of Public Affairs

THE U. S. ENVIRONMENTAL PROTECTION AGENCY'S (EPA)
SUPERFUND COMMUNITY INVOLVEMENT PROGRAM IS COMMITTED
TO PROMOTING COMMUNICATION BETWEEN CITIZENS AND THE AGENCY.

ACTIVE PUBLIC INVOLVEMENT IS CRUCIAL TO THE SUCCESS OF ANY PUBLIC PROJECT.

EPA'S COMMUNITY INVOLVEMENT ACTIVITIES AT THE
CARTER CARBURETOR SUPERFUND SITE
ARE DESIGNED TO

INFORM THE PUBLIC OF THE NATURE OF THE ENVIRONMENTAL ISSUES ASSOCIATED WITH THE SITE,

INVOLVE THE PUBLIC IN THE DECISION-MAKING PROCESS THAT WILL AFFECT THEM,

INVOLVE THE PUBLIC IN THE RESPONSES UNDER CONSIDERATION TO REMEDY THESE ISSUES, AND

INFORM THE PUBLIC OF THE PROGRESS BEING MADE TO IMPLEMENT THE REMEDIES.

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1.0 OVERVIEW OF COMMUNITY RELATIONS PLAN (Referred to in this document as the Community Involvement Plan (CIP))

This Community Involvement Plan (CIP) for the Carter Carburetor Site (the site), St. Louis, Missouri, identifies issues of community concern related to a planned cleanup at the site. It considers potential community impacts resulting from a non-time-critical removal to be implemented under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. Section 9601 et. seq.

This CIP was undertaken to determine how the U.S. Environmental Protection Agency (EPA) can best disseminate information and otherwise keep area residents and other interested parties informed concerning activities to be conducted at the site. Response activities, whether conducted by EPA or by responsible parties, will be carried out under CERCLA, which is often referred to as Superfund. EPA conducts community relations activities to ensure that the local public has an opportunity to participate in Superfund actions and is adequately informed of the decision-making process and of the progress toward cleanup.

The areas of community concern discussed in this CIP were identified primarily during interviews that were conducted with local residents, nearby business operators, and community leaders, including local elected officials, in 1997, 2009, 2010 and 2011. Information was also gathered from a public meeting held on October 4, 2010, to accept comments on the Engineering Evaluation/Cost Analysis (EE/CA). Background information was extracted from the EPA Action Memorandum for Removal at the Site, signed by the EPA Regional Administrator on March 18, 1996; the Unilateral Administrative Order for Removal Response Activities for the site, dated June 30, 1996, and from a Site Assessment Report completed for EPA by the Ecology & Environment (E & E) Technical Assistance Team, dated June 30, 1994. Some background on the city of St. Louis was extracted from The Peirce Report, published by the St. Louis Post-Dispatch in March 1997. The EPA Region 7 Office of Public Affairs (formerly the Office of External Affairs) will coordinate all of EPA's community relations activities at the site. The original CIP was drafted by Ecology and Environment, Inc., under EPA's Superfund Technical Assessment and Response Team contract, and in consultation with the EPA.

It includes the following:

- Site Description
- Community Background
- Highlights of Program
- Attachment A: List of Public Officials, Media Representatives and Other interested Parties

2.0 CAPSULE SITE DESCRIPTION

2.1 Site History, Investigations and Cleanup Plan

The Carter Carburetor Site was operated by the Carter Carburetor Corporation and Carter Automotive Products, both of which were subsidiaries of ACF Industries, Inc. (ACF) from the 1930s until about 1984. The plant consisted of several connected multi-story manufacturing, testing, office, and warehouse buildings that contained approximately 480,000 square feet of space. During its operational life, the plant manufactured carburetors for gasoline- and diesel-powered engines. Though exact employment figures are unavailable, the Carter Carburetor plant was a source of significant employment for the neighborhood from the 1930s until it ceased operations in 1984.

Aluminum and zinc were die cast and machined into carburetor components, which were then cleaned, treated with protective coatings and assembled into carburetors on the premises. Although numerous chemicals were used in the manufacturing process, the more predominant contaminants found at the site include poly-chlorinated biphenyls (PCBs) and trichloroethylene (TCE). The primary PCB contamination at the site was due to Pydraul which is a hydraulic fluid used primarily in the die cast machines. The TCE was a common industrial solvent primarily used for cleaning and degreasing carburetor components. In 1984, ACF closed the site and dismantled much of the equipment, and transferred ownership of the buildings or property to the Land Reutilization Authority (LRA) of St. Louis, who immediately transferred ownership to Mr. and Mrs. Hubert Thompson.

Since 1985, the site has been owned in whole or part by numerous entities including Mr. and Mrs. Hubert Thompson, Mr. and Mrs. Edward Pivrotto, Carter Building Incorporated (CBI), and the St. Louis Development Corporation's Land Reutilization Authority (LRA). The LRA re-obtained ownership of the northeast portion of the site after the Pivrottos failed to pay real estate taxes on the portion of the site they owned, and no substantive bids were received at a Sheriff's sale. Currently, the main manufacturing building and a smaller connected warehouse building (currently known as the Willco Plastics Building) are owned by CBI. The LRA currently owns the northeast portion of the site which was previously the location of two die cast buildings and a warehouse. These buildings were connected to the main building before being demolished in 1997 by ACF Industries, Inc. pursuant to a CERCLA Unilateral Administrative Order.

In August 1987, EPA conducted a Toxic Substances Control Act (TSCA) inspection of the Carter Carburetor plant, which led to issuance of a Complaint and Notice of Hearing to Hubert Thompson. In 1988, Mr. Thompson contracted with an environmental company to investigate and clean up spilled PCBs as a result of the dismantling of PCB electrical equipment. In addition, Mr. Thompson was ordered by EPA to remove and dispose of the PCB transformers and other electrical equipment. In February 1989, the Missouri Department of Natural Resources (MDNR) inspected the site and found that transformers, transformer oil, switches, and PCB-contaminated concrete had been shipped offsite for disposal. However, subsequent sampling by MDNR and a contractor hired by the Thompsons revealed that excessive levels of PCBs were still present in soils under the building and in concrete in the pump room. In addition, a PCB transformer and two drums of contaminated material remained on the premises. In February 1991, Mr. Thompson informed EPA that he did not have the financial assets to continue cleanup activities at the site and all PCB cleanup work ordered by EPA ceased. In 1993, the site was referred from EPA's PCB enforcement program to the Superfund program.

During the period from 1993 to 1996, EPA conducted several site inspections as part of the Superfund site assessment process. Sampling during these inspections found that interior surfaces in the buildings were contaminated with PCBs at levels that could pose a threat to persons within the buildings. The highest PCB levels were found primarily in the two die cast

buildings where Pydraul was used as hydraulic fluid in the die cast machines. In addition, EPA also discovered many drums and electrical equipment containing PCBs and PCB contaminated materials. As a result of the investigations, EPA requested the LRA to immediately over pack two drums of PCB oil to restrict access to the site and to post PCB-warning stickers.

Off-site sampling during one of the EPA site inspections revealed low level PCB-contamination on property owned by the Herbert Hoover Boys and Girls Club and on nearby residential properties near the Carter Carburetor Site. The contamination ranged up to 2.6 parts per million. Although a low human health risk, this PCB concentration indicates a possibility that airborne PCB-laden particulates have migrated off the property. In addition, high levels of PCBs were detected in the sewer lines beneath the Carter Building Inc.

On March 18, 1996, in a Removal Action Memorandum, EPA determined that a time-critical removal action should be performed at the site in order to reduce the immediate threat to human health and the environment posed by conditions at the site. The description of the actions needed to be taken is described in the Removal Action Memorandum.

In July 1996, EPA issued a Unilateral Administrative Order for Removal Response Activities (UAO). The UAO required ACF to undertake the actions identified in the March 1996 Removal Action Memorandum, which included:

1. Removal and disposal of (PCB) electrical equipment and drums of PCB waste;
2. Demolition of the two die cast buildings and the warehouse building;
3. Characterization, removal and off-site disposal of all contaminated building material and debris located on the north side of the north die cast building;
4. Characterization and off-site disposal of the contents and demolition debris of the two die cast buildings and warehouse; and
5. Installation of an interim cover and epoxy coating over the die cast buildings' foundation floors following the demolition and removal of the two die cast buildings and warehouse.

In 1997, ACF complied with the UAO and conducted the complete demolition of the warehouse and the partial demolition and interim cover of the two die cast buildings, as well as disposal of all associated PCB contaminated materials.

In 1998, EPA conducted an investigation of the main manufacturing building known as the CBI building. Collection and analysis of concrete chip samples and wipe samples revealed elevated concentrations of PCBs in this building, primarily on the first and third floors. The highest concentrations were detected on the first floor near the former entrance of the two die cast buildings.

In April 2003, ACF conducted additional environmental sampling at the site by collecting several soil borings primarily from around and beneath the remaining foundations of the two die cast buildings. Results of this sampling revealed high levels of PCBs in the subsurface as well as some low-level hydrocarbon and TCE contamination.

During the summer of 2005, ACF voluntarily conducted additional subsurface samples beneath the two die cast buildings and also collected limited ground water data from several piezometers installed on the east side of the CBI building. Results of this sampling better defined the PCB contamination beneath the two former die cast buildings and revealed only minor solvent and hydrocarbon contamination in the soil and ground water on the east side of the CBI building. Elevation measurements from the piezometers indicated on-site ground water was flowing to the southeast.

In September 2005, EPA reached an agreement with ACF to conduct an Engineering Evaluation/Cost Analysis (EE/CA). The EE/CA process as outlined in the Settlement Agreement and Order on Consent (AOC) was to gather, review and analyze environmental data and develop several cleanup alternatives.

During the summer of 2006, as part of the EE/CA process, ACF conducted an extensive investigation in and under the CBI building by collecting soil, concrete core samples, brick chips, and wipe samples. ACF also collected samples in the sewer lines and numerous

subsurface soil samples near the former above-ground TCE storage tank 8 (AST #8). In addition, ACF conducted an asbestos survey and lead based paint survey inside the buildings. The purpose of the building PCB sampling was to better delineate the extent of PCB contamination in order to estimate waste quantities for the EE/CA. The investigation of former AST #8 was to determine if a release of TCE had occurred. The data collected confirmed that TCE had been released and was at relatively high levels in the soil west of the CBI building. Samples of the sewer lines confirmed high levels of PCBs in the sewer. In addition, asbestos and lead based paint were predominant throughout the building and much of the asbestos was friable and airborne. The data for this investigation was submitted to EPA for review in the report titled *“Interim Data Submission Report for the former Carter Carburetor Site”, Round 1 Field Data, St. Louis, Missouri, November 2006*. After review of this data, EPA and ACF agreed to conduct further site sampling. The additional sampling was done primarily to further delineate the extent of TCE contamination in soil near AST #8. ACF also proposed to collect additional soil samples from the perimeter of the former die-cast building areas, to conduct a pilot study of PCB extraction techniques in the CBI building, and to conduct a thorough cleaning and inspection of the on-site sewer lines.

In the summer of 2007, ACF conducted an extensive investigation of the on-site sewer lines using cameras attached to a hose which was propelled by strong jets of water. Once the hose and camera reached the end of a sewer line the hose was reeled in as the water jets forced debris and water back into the manhole where it was collected, treated on-site, and properly disposed of. This process was conducted at every known sewer line that was accessible. In addition, ACF collected numerous subsurface soil samples on the west side of the CBI building to better delineate the TCE contamination from AST #8. The data from this inspection was submitted to EPA in a report titled: *“Interim Data Submission Report for the former Carter Carburetor Site”, Round 2 Field Data, St. Louis, Missouri, December 2007*. After reviewing this data, EPA and ACF agreed that on-site data were sufficient to begin preparation of the EE/CA. In January 2008, EPA directed ACF to begin preparation of the Streamlined Risk Evaluation (SRE). The SRE was approved by EPA in January 2009, and ACF was directed to prepare the Draft EE/CA for EPA review.

During the review of the SRE, the Missouri Department of Health and Senior Services (MDHSS) proposed that a vapor intrusion study should be conducted at the site to determine if the TCE vapors were a potential threat to human health. In October 2008, EPA conducted a sub-slab vapor intrusion study to determine if vapors were accumulating under the on-site buildings. The results of this study revealed vapors were accumulating at relatively high concentrations beneath the CBI building, with the highest concentrations occurring towards the southern end of the CBI building. After review of the data, EPA and MDHSS concluded that it was appropriate to collect samples from below the Herbert Hoover Boys and Girls Club even though ground water was flowing in the opposite direction. This conclusion was based on a single data point near the northeast corner of the CBI building which showed an elevated level of TCE in soil and the fact that children were present in the Herbert Hoover Boys and Girls Club.

In June 2009, ACF voluntarily collected samples from beneath the floor of the Herbert Hoover Boys and Girls Club to determine if the TCE vapors were significantly affecting the club. In addition, ACF collected additional ground water samples from the site to confirm groundwater flow direction. Results of this sampling effort confirmed groundwater flow was to the southeast and there were no significant concentrations of TCE in the groundwater to the north of the site. The samples collected beneath the floor detected vapors at low levels in two of the three samples.

On May 6, 2010, EPA Region 7 regional administrator, Karl Brooks, conducted an Environmental Justice Listening Session in St. Louis. The session was attended by representatives of neighborhood organizations, community service groups, and local, state, and federal government. During the course of the meeting a request was made that EPA address Carter Carburetor stating that it would demonstrate EPA's commitment to ensuring environmental justice.

The public comment period on the Engineering Evaluation/Cast Analysis (EE/CA) opened on September 27, 2010. A public meeting was held on October 4, 2010, to answer questions and listen to comments from the public about the EE/CA. The EE/CA identified four separate areas of remediation with a preferred alternative for each area. The four separate areas of remediation

are: the Carter Building, Inc. (CBI) building, the Willco Plastics building, the die cast area, and the trichloroethylene aboveground storage tank (TCE AST) area. *(Please refer to the EE/CA).*

2.2 Site Description/Location

The Carter Carburetor Site is located in the north-central portion of the city of St. Louis on a 10-acre site in an area of small businesses and residences. The site is located along Grand Boulevard about two miles north of the St. Louis University. Specifically, the site currently occupies one and one-half city blocks and is located at 2800 to 2840 North Spring Avenue in St. Louis, Missouri. The site is bounded on the north by Dodier Street, on the east by Grand Boulevard, on the south by St. Louis Avenue, and on the west by North Spring Avenue and Hyams Street. Directly across Dodier Street, north of the site, is the Herbert Hoover Boys and Girls Club which is used by some 1,200 children.

3.0 COMMUNITY BACKGROUND

3.1 Community Profile

Like the city of St. Louis, the immediate neighborhood around the Carter Carburetor Site has lost population and jobs in the recent decades. While the residential areas immediately across Grand Boulevard are relatively stable, occupied by retirees and lower-income homeowners, there are significant numbers of abandoned homes and businesses and vacant lots farther east and in other directions from the site. The population around the site is predominantly African-American. There are neighborhood block unit chairs and neighborhood association chairs. There is a register of Block Unit Chairs housed in the Urban League. The site is at a dividing line between the Third and 19th Wards, two of St. Louis' 28 city wards.

The Herbert Hoover Boys and Girls Club of America, located across Dodier Street to the north of the site, is a focal point for youth-related activities in the area. Since 1967, the club has been providing a safe place for children to learn and grow. The average daily attendance is 500 youths participating in club activities. Community volunteers donate more than 25,000 hours of

their time at the club. The club operates at full capacity, 48 weeks a year, six days a week during the school year and five days a week during the summer. The Sportsman's Park Unit, the original facility on North Grand, currently serves 3,000 children. The Herbert Hoover Boys and Girls Club of America is one of the repository for the site's Administrative Record, because of its proximity to the site and its central location for residents.

The population surrounding the Carter Carburetor site is predominately minority with a significant low-income population. Regional EJ staff have gathered and reviewed data within a 1-mile radius and identified that the population is above the regional EJ thresholds of 25% low income and/or minority and well over Missouri's state averages for poverty and minority populations. There are several other data points which raise concern regarding the potential for a disproportionate environmental burden which includes: the percentage of population 17 years and younger and the facilities which serve them (schools and childcare/recreational facilities), within a 1-mile radius of the facility; the number of regulated entities/potential sources of pollution within a 1-mile radius; and other environmental stressors such as the age of housing.

3.1.1 Demographics within a 1-mile radius of the facility:

- Total population: 18,487 persons reside within a 1-mile radius of the facility
- Minority Population: 97.6% of the total populations within a 1-mile radius of the facility are racial or ethnic minorities; 96.9% of the total populations within a 1-mile radius of the facility are African American.
- Persons below Poverty: 37% of the total populations within a 1-mile radius live below the poverty level.
- Education: 14.4% of persons 25 or older have less than a ninth grade education; 28.9% of persons 25 or older have from ninth to twelfth grade education; 32.9% have a high school diploma; while 24.8% of persons 25 or older have some college or a college degree.
- Languages: 97.3% of the populations within a 1-mile radius speak only English.
- Housing: 87% of housing within a 1-mile radius of the site was built prior to 1970.

3.1.2 Children:

The Herbert Hoover Boys and Girls Club is located adjacent to the facility on the north. Beaumont High School, Columbia Preschool, and Farragut Elementary School are located less than three blocks from the facility. Of the total population within a 1-mile radius of the facility, 31.5% are minors 17 years or younger; 8.5% of the total population within 1-mile of the facility are children 5 years or younger.

3.1.3 Permitted Facilities within a 1-mile radius of the Carter Carburetor facility:

- 2 Air Facility System AFS Major facilities
- 9 AFS Minor facilities
- 2 Resource Conservation and Recovery Act (RCRA) Large Quantity Generators
- 3 Toxic Release Inventory TRI Reporting Sites

3.2 Analysis of Key Community Issues and Concerns

A. 1997 Interviews

In 1997, area residents familiar with the Carter Carburetor property generally expressed much greater regret over the loss of jobs associated with the plant's closing than concerns over any hazardous wastes or contaminants that might have been left behind at the site. Several residents and officials interviewed had relatives, friends or acquaintances who had previously worked at the plant. Generally, those interviewed had no knowledge of contamination at the plant, and no one alleged any personal ill effects or claimed to know anyone who had suffered harmful effects as a result of coming in contact with the site. Those who have moved into the neighborhood more recently were typically unaware of the presence of PCBs or other contaminants on the site.

An elected official stated in 1997 that local elected officials began to get involved with the site in 1984 when the Kennedy Study was released. The Kennedy Study addressed revitalization of industrial properties in urban areas. As efforts to utilize the property progressed, elected officials and others became more aware of the presence of contamination remaining at the site. One official who expressed an interest in seeing the property redeveloped, either through his personal

involvement and investment, or by someone else, was active in efforts to assure that off-site properties were sampled and that the site would be cleaned up.

As indicated previously, no one interviewed during community interviews indicated knowledge of any impact on human health or the environment through contact with contaminants from the Carter Carburetor Site.

Residents, elected officials, and other community leaders expressed more concern about the dilapidated state of the unoccupied portions of the plant than about contaminants that exist. The concerns were that the site's appearance detracts from the over-all appearance of the area that it suggests abandonment of the area, and that it may be depressing property values. Residents were concerned with the overall safety of the building, and concerned that the homeless may be living in the building. A priority for the residents was to see the abandoned die cast buildings demolished and removed. The residents expressed the hope that someone might then build a manufacturing plant that would provide jobs for the area or locate a supermarket on the property, which would alleviate a need for area residents to travel substantial distances to shop. Location of dental or law offices and use of some of the property for storage of public records also were suggested as possible uses for the property. Several community members wished to see expansion of the Herbert Hoover Boys and Girls Club of America.

The only criticism of the EPA voiced by respondents during interviews conducted in 1997 was frustration that the process was taking so long and that they have not had enough information concerning the cleanup.

B. 2009, 2010, and January 2011 Interviews

On August 12, 2009, community interviews were conducted and these findings were much different than the community concerns of 1997. Almost all of the citizens interviewed expressed some concern with the possible health effects from the contamination at the site and a few expressed concerns that the contamination was spreading. There was a general opinion that the building should be torn down as it was an "eyesore" and a safety hazard to children and possibly to the homeless who may live in the buildings. There was also a general consensus that there has

been a lack of government involvement at the site. Several citizens wanted the community involved in the future planning for the use of the site.

At the public meeting held on October 4, 2010, and in subsequent community interviews conducted both by telephone and in person, citizens continued to express concern about the amount of time it was taking to resolve the issue. While many still wanted the building torn down there were several citizens who expressed more of an interest in development and jobs for the neighborhood. The overriding complaint was that the building was not productive and was a detriment to the area. Many had concerns relative to health, citing concern with removal of building rubble, health implications for pregnant women and children, health costs imposed by the contamination, and the incidence of asthma in the community. The people interviewed, almost unanimously, wanted more information and wanted the community to be involved in any future plans concerning the Carter Carburetor Site. Several requested that technical assistance be provided as quickly as possible. Comments received after the public meeting not only echoed what had been learned at the public meeting but added several concerns regarding groundwater, disruption to the community while cleanup was ongoing, air pollution, containment of the contamination, and disruption in the community. There were also questions regarding in-situ thermal desorption.

In response to the community, EPA provided additional information to the repositories and to the community leaders regarding the EE/CA. EPA also provided a Technical Assistance Support Contract (TASC) representative who will assist the community in understanding and providing input into technical issues during the cleanup process. EPA will confirm the availability of site-related documents at the designated document repositories. EPA will continue to work with individuals and community groups to provide assistance in interpretation of technical information presented in the EE/CA or other EPA documents.

4.0 EPA's Community Involvement Program

4.1 Goals

This community involvement program is designed to keep the public informed of site progress,

establish two-way communication, and provide opportunities for public input during site activities. A primary goal is to involve the community in site cleanup decisions as required under Superfund law.

Under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300, the regulations pertaining to the performance of removals and remediation of hazardous substances, community relations plans are normally developed and presented in conjunction with major decisions or milestones in the cleanup process. In the case of the Carter Carburetor Site, a decision was made to develop the initial CIP (previously known as the CRP or Community Relations Plan) in conjunction with a time-critical removal by ACF Industries, Inc., in the late 1990s.

EPA's community relations program will include the following approaches:

4.2 Objectives

EPA will strive to achieve the following community involvement objectives:

1. Share site information with the community on a timely basis.
2. Encourage and publicize opportunities for community input regarding site activities and proposed cleanup plans.
3. Notify local officials and businesses in the site area before field work or other site actions take place.
4. Maintain site information in the community and make it easily available to all interested residents, public officials, and business representatives.
5. Increase the level of awareness and understanding of the Superfund investigation and cleanup process.

4.3 Key Messages

EPA will use the following key messages for community involvement activities related to the Carter Carburetor Site:

1. EPA is addressing the site using the Superfund process and will comply with Superfund requirements and EPA technical criteria.
2. Throughout site activities, EPA will share information about the site with community members in the cleanup process.

4.4 Target Audiences

The Carter Carburetor Site community involvement program will focus on the following audiences:

1. Residents and businesses located near the site location.
2. Elected and administrative officials of local, state, and federal agencies serving the site community.
3. Neighborhood groups.
4. Area news media, as a vehicle for informing the general public.

Appendix A, Key Contacts, lists government officials, local businesses and news media identified to date. EPA has developed a site mailing list that includes residents and businesses located near the site, local and national elected officials and media officials. EPA is developing an e-mail address list for neighborhood groups at their request.

4.5 Community Involvement Activities

Activities outlined in this plan are designed to fulfill the Superfund public involvement requirements and to address community concerns regarding the Carter Carburetor Site. During the interviews, EPA asked community members to identify the most effective methods to provide information, allow for input, and reach the largest number of persons in the target audiences.

EPA will continue the following community involvement activities during cleanup activities for the Carter Carburetor Site:

- Publicize a point of contact for site information.
- Identify a community involvement team that will interact face-to-face with the community.
- Maintain the site information repositories and administrative record file.
- Update the site mailing list.
- Update the e-mail list.
- Prepare and distribute fact sheets/updates about site activities.
- Provide informal briefings for interested public officials or business representatives when deemed appropriate.
- Hold public meetings or availability sessions about site activities, as required by Superfund or community interest.

4.5.1 Site Mailing List

EPA has developed and will maintain a mailing list for the Carter Carburetor Site. The list includes residents that live near the site; local, state and federal officials representing the site community; businesses located near the site; and local news media contacts. EPA will update the list before each mailing.

4.5.2 Fact Sheets or Site Updates

EPA will provide fact sheets or site updates at key stages of the site cleanup process to summarize findings or other important information. EPA will make every effort to use clear, easily understood language. All written materials will include site contact names and phone numbers, repository locations, and opportunities for community involvement.

4.5.3 Public Notices

EPA placed a public notice in the local newspaper when the Engineering Evaluation/Cost Analysis proposed cleanup plan was released to the community. The ad included a brief summary of cleanup options considered for the site; EPA's recommended alternative; the date of the public comment period; and sources of contact for additional information.

4.5.4 Public Comment Period

A public comment period opened on September 27, 2010 and closed on January 31, 2011, for the Engineering Evaluation/Cost Analysis (EE/CA). Comment periods provide interested community members with an opportunity to review and comment on the proposed cleanup plans for sites.

4.5.5 Other Sources of Information

EPA's Office of Solid Waste and Emergency Response maintains a national website with general information about CERCLA/Superfund and related programs at <http://www.epa.gov/superfund/>

4.5.6 Community Involvement History at Carter Carburetor

1. EPA established information repositories at the Herbert Hoover Boys and Girls Clubs of America, 2901 N. Grand, St. Louis, Missouri 63107; the Divol Branch of the St. Louis Public Library, 4234 North Grand Avenue, St. Louis, Missouri 63107; and the EPA Records Center, 901 North 5th Street, Kansas City, Kansas 66101.
2. EPA will prepare fact sheets for the Carter Carburetor Site, and as developments dictate, for direct mailing to residents. Fact sheets will be distributed by mail to those who have expressed an interest, to the media, and to public officials.

3. At a public availability session on June 10, 1997, residents and other officials said a public availability session should precede any removal activity at the site, because those in the area could become concerned if they see workers wearing the white “moonsuits” associated with hazardous waste sites. While the “moonsuits” are a standard element of Personal Protective Equipment (PPE) for hazardous waste site workers, concern was expressed that residents will assume the worst. The residents might assume that dioxin or some similarly dangerous contaminant is present at the site, unless they are advised up-front exactly what is present at the site and what risk, if any, the contamination poses.

4. Residents and officials requested formal presentations in order to ensure that everyone gets the same information. Residents also expressed a strong preference for a starting time of 6:30 or 7:00 p.m. during a weekday evening for a public availability session, because they said that would allow for a maximum number of working people to attend. A few residents suggested day time meetings for those who worked nights.

5. EPA conducted community interviews in August 2009 in preparation of a CIP update. Citizens expressed concern with the possible adverse health effects associated with exposure to contamination at the site. There were views expressed about the safety hazard to children and possibly the homeless who use the building for shelter. Some were interested in having the building demolished. Many had suggestions on future uses for the site.

6. An ad was placed in The St. Louis Post Dispatch, St. Louis Argus, and The St. Louis American announcing a public comment period and a public meeting on October 4, 2010, to accept comments on the Engineering Evaluation/Cost Analysis (EE/CA).

7. A public meeting was held on October 4, 2010, to present the EE/CA and to accept comments. The comments and questions included among others; the cleanup is overdue, the site is an eyesore and contributes to neighborhood blight; EPA should demolish all of the site’s buildings; the site should be redeveloped; how will EPA remove contaminants and building rubble; what are health implications of the contaminated sites in the area for the local community; what are the health costs imposed by the contamination; how is asthma being

addressed; include air pollution control; and many thoughts on suggestions for future use of the property. There were complaints that the EE/CA was too difficult to understand in such a short time.

8. EPA conducted community interviews in January 2011. The interviews with individuals and group leaders expressed many of the same things as the October 4, 2010, meeting. Citizens brought to EPA's attention that it was difficult to get understandable information from the repositories in a timely manner and requested assistance.

9. The highest percentage of the residents interviewed would like the information repository to remain at the Herbert Hoover Boys and Girls Club. A few members of the community named different churches that EPA could consider.

10. The community had mixed views of how they would like to stay informed about the site. Primarily they preferred fact sheets and public meetings.

11. Many of those interviewed wanted to be involved in the selection of the future use of the site if the building is to be demolished.

12. EPA provided a Technical Assistance Support Contract (TASC) representative who will assist the community in understanding and providing input into technical issues during the cleanup process.

13. EPA will continue to work with individuals and community groups to provide assistance in interpretation of technical information presented in the EE/CA and elsewhere regarding potential response action at the site.

4.5.7 Evaluation of Community Involvement Plan

EPA will monitor community needs and input regarding the usefulness of the communication activities undertaken in this program. EPA will make every effort to address citizen concerns

about the site using channels and formats suggested by the local community. EPA will evaluate and adjust the program as needed to address evolving issues and incorporate new approaches to improve the effectiveness of communication activities during the course of site cleanup.

Appendix A Key Contacts

A. FEDERAL ELECTED OFFICIALS

The Honorable Roy Blunt

U.S. Senator
7700 Bonhomme, Suite 615
St. Louis, Missouri 63105
314-725-4484

The Honorable Roy Blunt

U.S. Senate
B40C Dirksen Senate Office Bldg.
Washington, D.C. 20510
202-224-5721

The Honorable Claire McCaskill

U.S. Senator
5850 A Delmar Boulevard
St. Louis, Missouri 63103
314-367-1364

The Honorable Claire McCaskill

U.S. Senate
493 Russell Senate Office Building
Washington, D.C. 20510
202-224-6154

The Honorable William Clay

Member, U.S. House of Representatives
625 North Euclid Street, Suite 326
St. Louis, Missouri 63108
314-383-5240

The Honorable William Clay

U.S. House of Representatives
2418 Rayburn House Office Bldg.
Washington, D.C. 20515
202-225-2406

B. STATE ELECTED OFFICIALS**Governor Jeremiah W. (Jay) Nixon**

Office of the Governor

State Capitol

Jefferson City, Missouri 65101

573-751-3222

State Senator Robin Wright Jones

State Capitol Building, Room 425

Jefferson City, Missouri 65101

573-751-2606

District 5 Office

3303 Olive Avenue

St. Louis, Missouri 63101

314-533-8800

State Representative Chris Carter

201 West Capitol Avenue

Room 115H

Jefferson City, Missouri 65101

573-751-7605

C. LOCAL ELECTED OFFICIALS

Mayor Francis G. Slay

Mayor City of St. Louis
City Hall, Room 200
1200 Market Street
St. Louis, Missouri 63103
314-622-3201
Fax: 314-622-4061

Alderman Lewis E. Reed, President

St. Louis Board of Aldermen
City Hall, Room 230
1200 Market Street
St. Louis, Missouri 63103
314-622-3287

Alderman Freeman Bosley, Ward 3

City Hall, Room 230
1200 Market Street
St. Louis, Missouri 63101
314-622-3287

Alderwoman Marlene Davis, Ward 19

City Hall, Room 230
1200 Market Street
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314-622-3287

Committeeman Mike McMillan, Ward 19

2848 Locust
St. Louis, Missouri 63107

Committeewoman Cecilia Grant

1909 Coleman
St. Louis, Missouri 63107

D. ST. LOUIS CITY OFFICE:

Land Reutilization Authority
One Metropolitan Square
211 N. Broadway, Suite 2420
St. Louis, Missouri 63102
314-436-9600

St. Louis Development Corporation
1015 Locust Street
St. Louis, Missouri 63012
314-622-3400

E. FEDERAL AND STATE AGENCY OFFICIALS**Jeffrey Weatherford**

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Scott Pemberton

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Janette Lambert

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Belinda Young

Community Involvement Coordinator
U.S. Environmental Protection Agency
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Wayne Roberts

Missouri Department of Natural Resources
1730 East Elm
Jefferson City, MO 65101
Park Hills, MO 63601

Jonathon Garoutte

Mo. Dept. of Health and Human Services
P.O. Box 570
Jefferson City, MO 65102
573-526-6946

Appendix B

Media Contacts

A. NEWSPAPERS

St. Louis Post Dispatch 900 N. Tucker Boulevard St. Louis, Missouri 63101	314-340-8000
St. Louis Business Journal One Metropolitan Square, Suite 2170 St. Louis, Missouri 63102	314-421-6200
North Side Journal 4305 Woodson Road St. Louis, Missouri 63116	314-426-2222
South Side Journal 4210 Chippewa St. Louis, Missouri 63101	314-664-2700
The Riverfront Times 1221 Locust Street, Suite 900 St. Louis, Missouri 63103	314-421-6666
The St. Louis American 4144 Lindell St. Louis, Missouri 63108	314-533-8000
St. Louis Argus 4595 Martin Luther King Drive, Suite B-5 St. Louis, Missouri 63106	314-531-1323
St. Louis Sentinel 2900 N. Market St. Louis, Missouri 63106	314-531-2101

B. TELEVISION

KTVI, Channel 2 5915 Berthold St. Louis, Missouri 63110	314-647-2222
KMOV, Channel 4 One Memorial Drive St. Louis, Missouri 63102	314-621-4444
KSDK, Channel 5 KSDK, News Channel 5 1000 Market Street St. Louis, Missouri 63101	314-621-7911
KETC, Channel 9 3655 Olive Street St. Louis, Missouri 63108	314-512-9199
KPLR, Channel 11 2250 Ball Drive St. Louis, Missouri 63146	314-213-2222
KNLC, Channel 24 1411 Locust Street St. Louis, Missouri 63103	314-436-2424
KDNL 1215 Cole Street St. Louis, Missouri 63106	314-436-3030

C. RADIO

KXEN – 1010 AM 314-436-6550
P.O. Box 8085
Mitchell, Illinois 62040

KSTL – 690 AM 314-656-3608
10845 Olive Blvd., Suite 160
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WRDA – 104.1 FM 314-989-9550
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