

US EPA ARCHIVE DOCUMENT

BCLRF Community Relations Sample Document

This document provides information to assist Brownfields Cleanup Revolving Loan Fund (BCRLF) cooperative agreement recipients in carrying out BCRLF public participation and community relations requirements and provides a sample Community Relations Plan. Cooperative agreement recipients utilizing BCRLF funds are required to carry out public participation activities in accordance with the National Contingency Plan (NCP) and Part 35, Subpart O throughout the BCRLF response selection and implementation process. Section I of this sample provides a summary, in checklist format, of the community relations and public participation requirements. Section II provides a suggested outline for a community Relations Plan. Attachment 1 is a sample Community Relations Plan.

Please note that the sample document and its specific provisions may or may not be appropriate to your program. Your own Community Relations Plan should be prepared based on your review of the sample in combination with a review of other program guidance, and applicable statutory and regulatory provisions. It is up to the user to review this sample carefully and determine whether it is appropriate for your program.

Also, please note that the cooperative agreement recipient is required to submit the Community Relations Plan to EPA for approval.

I. *Summary of Community Relations and Public Involvement Requirements in BCLRF Non-Time Critical Removals*

Below is a summary, in checklist format, of the required community relations and public involvement activities. This summary is provided for the reader's convenience. Cooperative Agreement recipients should review Section V,B of the BCLRF Administrative Manual, 40 CFR 300.415(n), 40 CFR 300.820(a)(3) and 40 CF 35.6105(a)(2)(iv) for a complete description of BCRLF Program community relations requirements. The cooperative agreement recipient must conduct these activities for each site where a loan is made.

- G Designate an Agency Spokesperson to inform the community of actions taken, respond to inquiries, and provide information concerning the removal activities.
- G Prior to the completion of the engineering evaluation/cost analysis (EE/CA) or its equivalent, conduct interviews with local officials, community residents, public interest groups, or other interested and affected parties, as appropriate.
- G Prior to the completion of the (EE/CA) or its equivalent, prepare a Community Relations Plan (CRP) based on community interviews and other relevant information, specifying the community relations activities that the lead agency expects to undertake during the response (see Section II for a suggested outline and Attachment 1 for a sample CRP.)

- G Submit the CRP to EPA for review and approval prior to beginning of on-site field work.
- G Prior to formal documentation that a BCLRF response is authorized as a particular site, establish at least one local information repository at or near the location of the potential response action that includes public information related to that action and an administrative record file. The cooperative agreement recipient (lead agency) must inform the public of the information repository and provide notice of availability of the administrative record for public review.
- G Publish notice of availability of the EE/CA or its equivalent in a major local newspaper of general circulation.
- G Provide reasonable opportunity (not less than 30 days) for written and oral comments on the EE/CA or its equivalent. Upon timely request, extend the public comment period by a minimum of 15 days.
- G Prepare a written response to significant comments
- G Document compliance with the requirements for interviews, a CRP, and information repository in the Administrative Record file.

II. *Suggested Outline for a Community Relations Plan*

The NCP requires the development of a Community Relations Plan (CRP). The CRP is a site specific document. Below is a suggested outline for a Community Relations Plan, Attachment 1 contains a sample CRP following this suggested format.

A. Overview of the Community Relations Plan

Purpose: Provide a general introduction by briefly stating the purpose of the Community Relations Plan and the distinctive features of the community relations program planned for this specific site. Note any special circumstances that the plan has been designed to address.

B. Spokesperson and Information Repository

- List of contacts
- Locations for Information Repository and Meetings

C. Site Description

Purpose: Provide the historical, geographical, and technical details necessary to show why the site is being cleaned up. Suggested topics include:

- Site location;
- History of site use and ownership;
- Nature of threat to public health and environment;

D. Community Background

Purpose: Describe the community and its involvement with the site.

- **Community Profile:** the economic, demographic and political structure of the community, and key community issues and interests. Discuss Environmental Justice concerns, if applicable.
- **Chronology of Community Involvement:** how the community has reacted to the site in the past, actions taken by citizens, and attitudes toward government roles and responsibilities. Discuss actions taken by any government agencies or government officials, such as public meetings or news releases.
- **Key Community Concerns:** how the community regards the risks posed by the site or the removal process used to address those risks. The Lead Agency needs to demonstrate their interest, commitment and credibility to the entire community in order to set the stage for the community cooperation that may be critical during the removal activities.

E. Continued Community Involvement

Purpose: State what community relations activities will be conducted at the site and specify when they will occur. Suggest additional techniques that might be used at the site as the cleanup action proceeds, as well as when these techniques are likely to be most effective.

- Educating the community on the possible hazards related to site activities, and keeping them apprised on projected activities at the site through fact sheets, news-letters, the media/press, etc.;
- Setting up public meetings, open forums, town hall meetings, etc., during the project period to keep the community informed and involved;
- Hosting a closeout meeting. Provide a final update on what has been done and the outcome of activities.

ATTACHMENT 1

Sample Community Relations Plan

This sample document and its specific provisions may or may not be appropriate to your program. Your own Community Relations Plan should be prepared based on your review of the sample in combination with a review of other program guidance, and applicable statutory regulatory provisions. It is up to the user to review this sample carefully and determine whether it is appropriate for your program.

Overview

The purpose of the Community Relations Plan (CRP) is to describe the City of ****strategy to address the needs and concerns of **** residents potentially affected by the proposed removal of environmental contamination present at the Whiteway Laundry site located at 10 S. State Street. The CRP outlines how the City and the developer has involved, and will continue to involve, affected residents, City officials and local organizations in the decision-making process regarding the environmental cleanup at the site.

Active residents involved in neighborhood issues are essential resources for the success of the CRP because they have a comprehensive understanding of the **** area and they hold positions of responsibility within the community. The City perceives these citizens as key points of contact and communication with the **** neighborhood. The success of the environmental cleanup and subsequent redevelopment of the Whiteway Laundry property hinges on informed citizen involvement in each step of the cleanup process.

Spokesperson and Information Repository

The Spokesperson for this project is *****, who may be contacted at:

Address
City, State Zip
Phone

The Information Repository is also located at the City offices at the above address. All public meetings will be held at the Information Repository offices.

Site Description and History

Site Location

The former Whiteway Laundry facility is located at 10 S. State Street. The Site occupies approximately 38,000 square feet and topographically flat. The Site is bounded by George Street on the west, a parking area and a residential properties along the east and south. The developer, Ajax Associates, is under contract to purchase this site. The cleanup activities of this site will be undertaken by Ajax Associates using loan funds from the City's Brownfields Cleanup Revolving Loan Fund.

Site History

The property has operated as a laundry since its development in the early 1900s. The most recent tenant, Whiteway Laundry, ceased operations in 1994. Buildings on the property have been expanded upon and modified throughout the operating period up until the current building configuration.

Nature of Threat to Public Health and Environment

The only previously identified environmental condition at the Site consisted of a trisodium phosphate (TSP) release related to a leaking storage tank. The tank and the majority of the contaminated soil were removed from the site.

However, other potential sources of environmental contamination have been previously identified at the property. These potentials sources of contamination include:

- TSP associated with a former boiler room in the northern portion of the Site;
- Laundry operations which may have used tetrachloroethylene (PCE) along the eastern property boundary; and,
- Two dry wells, DW-1 and DW-2 (See Site Maps – Exhibit A), from which a photoionization detector indicated the presence of volatile organic compounds (VOCs).

During June and July of 1999, a site assessment was completed by The Acme Company. Acme is an environmental consulting firm hired by the City under the City's EPA Brownfields Pilot Program. The results of this investigation, as well as the subsequent Risk Assessment, are in the information repository on the project (address listed below) and are available fo public inspection at the Town Hall. When the Engineering Evaluation and Cost Analysis is completed, a notice of its availability will be published in the herald Daily News for public comment a copy will also be available in the information repository at the Town Hall.

The ACME Company completed the site assessment to evaluate the nature and scope of the contamination, the potential risk presented by such contamination and its potential impacts on anticipated future uses of the Site. The site assessment consisted of collecting 36 soil samples from ten borings and groundwater samples from seven temporary wells installed across the property. Contaminant concentrations exceeding the States contingency Plan Reportable

Concentrations (RC) were detected in the portion of the property associated with two dry wells near the southern end of the site.

Community Background

Community Profile

The Whiteway Laundry site is located in a traditional working class neighborhood of ****. The housing stock is made up of predominately single-family homes built prior to 1939 and the predominant land use of the area is residential.

The Site is within Census Tract **** having within that tract 977 persons of whom 37% fall within HUD guidelines as people with incomes within low to moderate guidelines. Ten percent of the population falls below the poverty level.

From a historical perspective this area was once dominated by individuals who worked at two textile facilities that were located within walking distance of these neighborhoods. Deep cutbacks in the workforce at these two plants has taken place and local employment at the textile facilities has been sharply curtailed.

The area has been the recipient of major investment by the City over the last five years with the municipality investing over 35 million dollars for the construction of both a new high school and middle school.

The City is also expending over 20 million dollars in area infrastructure improvements as part of sewer separation project to abate Combined Sewer Overflow discharges into the **** River as well as to control regional flooding.

Chronology of Community Involvement

Over the past several years, the City has worked closely with the **** neighborhood residents, local officials and other interested stakeholders in planning the investigation and cleanup of the site, Community Outreach efforts have included newsletters, information brochures and the following community meetings:

Date	Subject
January 21, 2000	Project Kick-Off Meeting
March 10, 2000	Site Tour
March 18, 2000	Review past response work & Site Investigation Plans
October 27, 2000	Site Investigation Results and Redevelopment Plans

Key Community Concerns:

Revised September 11, 2001

From the ongoing Community Relations efforts, it was learned that local residents were concerned about the nature and extent of environmental contamination and the proposed re-use plans for the site.

From an environmental perspective, community meetings addressed the site investigation efforts and the results thereof. Information was shared with residents concerning the types of contaminants that were discovered during the investigation and the corresponding environmental risks. Proposed cleanup plans were also discussed.

Local residents were asked to share their thoughts on potential re-use options for the site. A large majority of these residents indicated their preference that the site be cleaned up sufficiently to allow the property to be redeveloped as residential property given that the surrounding neighborhood is entirely residential.

Continued Community Involvement

A legal notice will be placed in the local newspaper announcing the intended demolition at the site and to notify residents of a public meeting regarding the demolition and removal efforts. In conformance with Brownfields Cleanup Revolving Loan Fund requirements, the legal notice will also announce that the information repository on this project, including the environmental assessments, risk assessments and other environmental information is located at the City offices and is available for viewing during normal business hours and at other times by appointment. The notice will also announce the start of a thirty-day comment period on the draft Engineering Evaluation/Cost Analysis (EE/CA). The City will accept comments on the EE/CA during the comment period and will provide written responses which will become part of the administrative record. The information repository will be updated with the inclusion of all meeting minutes, status report and other communications.