

UNITED STATES MARINE CORPS
Marine Corps Base
Camp Lejeune, North Carolina 29542-5001

6280/9
FAC

17 SEP 1986

From: Assistant Chief of Staff, Facilities, Marine Corps Base,
Camp Lejeune
To: Joint Public Affairs Office
Staff Judge Advocate

Subj: PUBLIC AFFAIRS GUIDANCE ON THE NACIP PROGRAM

Encl: (1) CNO ltr 2090 Ser 451/6U394528 dtd 7 Aug 86
(2) Milestone Chart

1. We request your assistance in developing a public information program as described in enclosure (1).

2. Preparation of a formal community relations plan should be considered in the near future. This plan is presently not required because Camp Lejeune is not included in the National Priorities List under the Superfund Act.

3. The Feasibility Study with recommendations for Marine Corps responses to contamination problems may need to be released for the 21 day public comment period as described in enclosure (1). Please give us your thoughts on this matter.

4. A start up date for the next round of sampling and analyses is mid-October, as estimated by LantDiv and shown on enclosure (2). Mr. Robert Alexander, MCB Environmental Engineer, extension 3034/3035, will assist in developing appropriate public information regarding this work.

T. J. DALZELL

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EnvEngr

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DEPARTMENT OF THE NAVY
OFFICE OF THE CHIEF OF NAVAL OPERATIONS
WASHINGTON, DC 20350-2000

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IN REPLY REFER TO
5090
Ser 451/6U394528
7 August 1986

From: Chief of Naval Operations
Subj: HAZARDOUS WASTE (HW) SITE CLEANUP - PUBLIC AFFAIRS GUIDANCE
Ref: (a) CNO ltr Ser 451/5U392968 of 5 Mar 85 w/encl
Encl: (1) CHINFO memo Ser OI-50 of 1 Jul 86

1. The Navy Assessment and Control of Installation Pollutants (NACIP) program finds, evaluates and controls environmental contamination from past HW disposal practices at Navy installations. Reference (a) provided public affairs guidance for the release of NACIP studies by your installations. This letter contains expanded public affairs guidance with respect to the general NACIP program and specific requirements for "Community Relations Plans" in instances where Navy sites are included on the "National Priority List" (NPL).
2. The Comprehensive Environmental Restoration Compensation and Liabilities Act (CERCLA), requires that the Environmental Protection Agency maintain the NPL to show the Nation's worst HW sites for purposes of public information and expenditure of CERCLA superfund monies for site cleanups. Federal sites are included on the NPL only for public information purposes; CERCLA superfund monies are not available for cleaning up federal sites. Navy HW sites listed as proposed NPL sites as of 1 July 1986 are at the following activities:

NAS Whidbey Island, WA
NSB Bangor, WA
NUSWES Keyport, WA
NADC Warminster, PA
NAEC Lakehurst, NJ
NWS Earle, NJ
NAS Brunswick, ME
NAS Moffet Field, CA

3. Enclosure (1) prescribes a proactive attitude to keep the public informed of all NACIP activities, and spells out the specific legal requirements for community relations plans in cases where Navy HW sites are listed on the NPL. It should be noted that the intent of public affairs in the NACIP program is to present factual and timely information consistent with national security considerations, obtain community feedback, dispel rumors and promote understanding; it is not designed to sell a particular action. Accordingly, we emphasize the need for in-depth technical expertise/assistance in developing public information programs.

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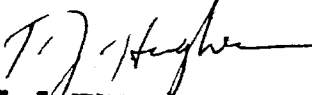
Enclosure (1)

Subj: HAZARDOUS WASTE (HW) SITE CLEANUP - PUBLIC AFFAIRS GUIDANCE

4. Please advise your installations in the NACIP program that:

a. The proactive public information program described in paragraph 5 of enclosure (1) is Navy policy to be implemented at installation level for all NACIP HW sites, and;

b. A formal community relations plan, as described in paragraphs 3 and 4 of enclosure (1), shall be prepared by each installation that has a HW site listed on the NPL. KS scope!


J. J. HUGHES
Deputy Chief of Naval
Operations (Logistics)

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DEPARTMENT OF THE NAVY
OFFICE OF INFORMATION
WASHINGTON, D.C. 20350

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IN REPLY REFER TO
4602
OI-50
1 July 1986

MEMORANDUM FOR AREA COORDINATORS

Subj: PUBLIC AFFAIRS GUIDANCE--HAZARDOUS WASTE SITE CLEANUP

Ref: (a) OPNAVINST 5090.1
(b) CHINFO Memorandum 4602 OI-511 of 31 JAN 85

Encl: (1) Extract from 40 CFR 300
(2) Community Relations Activities at DOD Sites

1. The Navy Assessment and Control of Installation Pollutants (NACIP) Program detailed in reference (a), paragraph 11202.C, is a three-phase nationwide process to identify Navy past hazardous waste sites and take necessary cleanup action. Reference (b) provides general public affairs guidance concerning NACIP activities. The purpose of this memorandum is to address recently published Environmental Protection Agency (EPA) regulations, enclosure (1), and to expand on reference (b).

2. It remains the policy of the Department of the Navy to keep interested parties (in addition to state and local regulatory agencies) informed of NACIP activities. In this regard, the following provides guidance to ensure both compliance with regulatory requirements and the effective promulgation of information to the public.

3. The National Priority List (NPL) is an EPA listing of the nations' worst hazardous waste sites. The listing is required by the Comprehensive Environmental Restoration Compensation and Liabilities Act (CERCLA). Federal agency hazardous waste sites are evaluated by EPA for listing along with all other national sites. Enclosure (1) requires that NPL sites (including Navy sites designated as such) follow a written Community Relations Plan which must include the following:

- a. Background and history of community involvement at the site, including local activity and interest, key issues and site history.
- b. Site specific NACIP objectives.
- c. Community relations activities to be used to meet stated objectives.
- d. A schedule for the completion of NACIP activity.
- e. A mailing list of affected and interested groups and individuals, plus a listing of Navy, EPA, and other agency officials responsible for community relations.

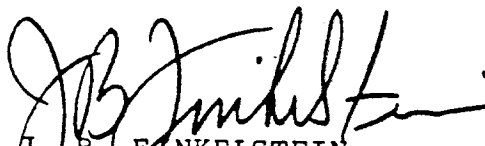
Enclosure (1)

Subj: PUBLIC AFFAIRS GUIDANCE--HAZARDOUS WASTE SITE CLEANUP

4. The Community Relations Plan must also take into account a mandatory 21-day public comment period preceding final selection of NACIP Phase 3 cleanup/containment remedies. The document approving Phase 3 action will include a section which summarizes major issues raised by the public, and how those issues were addressed. It is, therefore, necessary to have community relations plans in place prior to the completion of Phase 2 activity. Enclosure (2) is provided for information and may be useful in the development of effective community relations planning.

5. Public affairs activity regarding the NACIP Program should be of a proactive nature throughout. To assure the public that the Navy is not hiding information concerning former hazardous waste sites on Navy property, local and state officials, media and interested organizations should be fully apprised of NACIP activity at the commencement and conclusion of each phase of work. Completed studies should be released as soon as practical and, in cases where a high level of local interest exists, status reports of the contractor's field activities should be provided. Close coordination with Public Works personnel at the installation level and with NAVFACENGCOCOM Engineering Field Division experts is essential inasmuch as information in this area is of a highly technical, specialized nature.

6. Guidance contained in reference (b) concerning media queries and policy matters remains unchanged.


J. B. FINKELSTEIN
Rear Admiral, U. S. Navy
Chief of Information

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(10) EPA will revise and publish the NPL at least annually.

§ 300.67 Community relations.

(a) The lead agency shall develop and implement a formal community relations plan for removal actions taken pursuant to § 300.65 and for remedial action at NPL sites, including enforcement actions, except as provided for in § 300.67(b). Such plans must specify the communications activities which will be undertaken during the response and shall include provision for a public comment period on the alternatives analysis undertaken pursuant to § 300.68. The use of the RRT to assist community relations activities shall be considered in developing community relations plans.

(b) In the case of actions taken pursuant to § 300.65 or enforcement action to compel response analogous to § 300.65, or other short-term action needed to abate a threat to public health or welfare or the environment, a spokesperson will be designated by the lead agency. The spokesperson will inform the community of actions taken, respond to inquiries, and provide information concerning the release. In such cases, if the action is of short duration, or if response is needed immediately, a formal plan is not necessary. However, if the removal action is expected to extend or does extend beyond 45 days, a formal plan must be developed and implemented.

(c) For all remedial actions pursuant to CERCLA section 106 at NPL sites including Fund-financed and enforcement actions, a community relations plan must be developed and approved prior to initiation of field activities and implemented during the course of the action. In enforcement actions, a responsible party may be permitted with lead agency oversight to implement appropriate parts of the community relations plan.

(d) In remedial actions at NPL sites, including Fund-financed and enforcement actions, feasibility studies that outline alternative remedial measures must be provided to the public for review and comment for a period of not less than 21 calendar days. Such review and comment shall precede selection of the remedial response. Public meeting(s) shall, in most circumstances, be held during the comment period. The lead agency may also provide the public with an opportunity to comment during the development of the feasibility study.

(e) A document which summarizes the major issues raised by the public and how they are addressed must be

included in the decision document approving the remedy.

(f) In enforcement actions in litigation under CERCLA section 106, the community relations plan, including provision for public review of any feasibility study prepared for source control or management of migration measures, may be modified or adjusted at the direction of the court of jurisdiction or to accommodate the court calendar.

(g) Where responsible parties agree to implement the permanent site remedy pursuant to an administrative order on consent, the lead agency shall provide public notice and a 30-day period for public comment, including comment on remedial measures. Where settlement is embodied in a consent decree, public notice and opportunity for public comment shall be provided in accordance with 28 CFR 50.7. A document summarizing the major issues raised by the public and how they are addressed will be prepared.

§ 300.68 Remedial action.

(a) *Introduction.* (1) Remedial actions are those responses to releases that are consistent with permanent remedy to prevent or minimize the release of hazardous substances or pollutants or contaminants so that they do not migrate to cause substantial danger to present or future public health or welfare or the environment [see CERCLA section 101(24)]. Fund-financed remedial action, excluding remedial planning activities pursuant to CERCLA section 104(b), may be taken only at sites listed on the NPL.

(2) The Remedial Project Manager (RPM) shall carry out responsibilities in a remedial action as delineated in § 300.33(b).

(3) Federal, State, and local permits are not required for Fund-financed remedial action or remedial actions taken pursuant to Federal action under section 106 of CERCLA. However, remedial actions that involve storage, treatment, or disposal of hazardous substances or pollutants or contaminants at off-site facilities shall involve only such off-site facilities that are operating under appropriate Federal or State permits or authorization and other legal requirements.

(b) *State Involvement.* (1) States are encouraged to undertake Fund-financed remedial response in accordance with § 300.62 of this Plan.

(2) States must meet the requirements of CERCLA section 104(c)(3) prior to initiation of a Fund-financed remedial action.

(3) Planning activities associated with remedial actions taken pursuant to

CERCLA section 104(b) shall not require a State cost share unless the facility was owned at the time of any disposal of hazardous substances therein by the State or a political subdivision thereof. Such planning activities include, but are not limited to, remedial investigations, feasibility studies, and design of the proposed remedy. For sites owned by a State or its political subdivision, cost sharing commitment is required prior to remedial action.

(c) *Operable Unit.* Response action may be conducted in operable units. Operable units may be conducted as remedial and/or removal actions.

(1) Response actions may be separated into operable units consistent with achieving a permanent remedy. These operable units may include removal actions pursuant to § 300.65(b), and/or remedial actions involving source controls, and/or management of migration.

(2) The RPM shall, as appropriate, recommend whether or not operable units should be implemented prior to selection of the appropriate final remedial measure.

(3) Implementation of operable units may begin before selection of an appropriate final remedial action if such measures are cost-effective and consistent with a permanent remedy. Compliance with § 300.68(b) is a prerequisite to implementing remedial operable units.

(d) *Remedial Investigation/Feasibility Study (RI/FS).* An RI/FS shall, as appropriate, be undertaken by the lead agency conducting the remedial action to determine the nature and extent of the threat presented by the release and to evaluate proposed remedies. This includes sampling, monitoring, and exposure assessment, as necessary, and includes the gathering of sufficient information to determine the necessity for and proposed extent of remedial action. Part of the RI/FS may involve assessing whether the threat can be prevented or minimized by controlling the source of the contamination at or near the area where the hazardous substances were originally located (source control measures) and/or whether additional actions will be necessary because the hazardous substances have migrated from the area of or near their original location (management of migration). Planning for remedial action at these releases shall, as appropriate, also assess the need for removals. During the remedial investigation, the original scoping of the project may be modified based on the factors in § 300.68(e).

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Encl (1)

COMMUNITY RELATIONS ACTIVITIES AT DEPARTMENT OF DEFENSE SITES

BY

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March 1984

Presented at the American Defense Preparedness Association's
Environmental Conference

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Encl (2)

COMMUNITY RELATIONS ACTIVITIES AT DEPARTMENT OF DEFENSE SITES

By

Daphne Gemmill, U.S. Environmental Protection Agency
and
Mary D. Sexton, ICF Incorporated¹

Community relations activities during hazardous waste site cleanups are important for several reasons. Through these activities, the response agency can provide citizens affected by the site with needed information about site contamination and the likely effects of cleanup actions. Citizens in turn can provide the response agency with needed information about the extent of contamination, about alternative response actions, and about responsible parties. And, a close working relationship between the response agency and the community can help ensure that the community will support a cost-effective remedy at the site. This paper describes what the Environmental Protection Agency (EPA) has learned about effective community relations activities at hazardous waste sites and suggests how some aspects of EPA's approach to community relations may be applicable to Department of Defense (DOD) sites.

EPA'S COMMUNITY RELATIONS EXPERIENCE

During the first three years of the Superfund program, EPA has found that a good community relations program at hazardous waste sites requires substantially more than a public relations effort. For example, EPA has found that citizens do not always accept that the government has their best interests at heart just because the agency keeps them informed about the planned response actions. Instead, citizens have stressed that they want specific kinds of information about their site when they need it and in the form they need it. EPA has also learned that some citizens want more than information about the site and response action: they want an opportunity to be involved in response decisions.

Providing citizens with the information they need and involving them in response decisions is a resource-intensive effort that requires skill and commitment. For example, to identify the kinds of information citizens want about the site and the planned response action, agency staff must meet with citizens and ask: what information do you want about the site? in what form do you want it? when and where do you want to receive it? how can we accommodate your need for information if we cannot for some reason meet your specific requests?

Furthermore, citizen involvement in response decisions often requires

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substantially more than implementing a formal comment period on response decisions. It can mean meeting with citizens regularly during remedial planning to elicit and consider their concerns. It can involve keeping records of comments citizens make throughout a response action and then demonstrating how the agency considered these comments and factored them into response decisions. Or, citizen involvement may require eliciting citizen comments on procedures for implementing cost-effective alternatives and then implementing the community's preferred approach (such as complying with the community's wishes about the timing and route of transport of wastes off-site). In all cases, citizen involvement means giving citizens an opportunity to affect response planning and decisions.

EPA's recognition that community relations requires both an information program and an active citizen involvement program developed over a three year period. When the Superfund program was first implemented, EPA conducted an analysis of 21 hazardous waste sites to determine how community interests can affect response activities. Among other things, this analysis confirmed that:

- Every site has the potential for public opposition, heated conflict, and high media visibility;
- Public opposition to agency response plans can lead to delays, work stoppages, obstruction of technically sound remedies and cost overruns; and
- The technical adequacy of a response action in no way assures public acceptance.

In response to this analysis, EPA designed and implemented a community relations program for Superfund. Under this program, EPA staff in the Regional Offices were required to develop a community relations plan for each remedial and longer term removal site that detailed the two-way communications activities to be conducted at the site. The program also required that EPA hold a formal comment period prior to selecting a remedial alternative and give prior notification before taking response actions. About a year ago, after undertaking a program review and listening to public comment, EPA decided that its program was adequate as a public information program but inadequate as a citizen involvement program.

Since that time, EPA has modified its community relations policy, strengthened its commitment to involving citizens in response decisions, and initiated a training program for Regional Office and state staff to ensure that the policies are understood and carried out. EPA's current goal is to ensure that its Superfund community relations program is both a public information program and a public participation program. As Administrator William Ruckelshaus stated recently during a pilot training program: "The purposes of the program are to:

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- Encourage -- actively -- citizens to express their concerns and provide information;
- Seek out -- actively -- citizen comments to all response actions;
- Consider -- explicitly -- citizen comments in formulating response decisions; and
- Explain -- specifically -- how citizen comments were incorporated into response decisions."

To ensure that the program's objectives are reflected in activities carried out at sites, EPA now requires that:

- Community relations plans be based upon discussions with state and local officials, civic and community organizations, interested residents, and media to gain a first hand understanding of the major community issues, citizens' information needs, and level of public interest.
- Community relations activities be closely integrated with technical response activities.
- A comment period be implemented before remedial decisions are made.
- Community input be solicited at other points during the response action as well, wherever feasible and needed.
- Response agency staff document how community input was considered and incorporated into response plans.

We bring this abbreviated history of EPA's community relations program to DOD's attention because we believe that DOD can benefit from EPA's "lessons learned" in designing its approach to community relations during response actions. Under the Memorandum of Understanding (MOU) between DOD and EPA for implementing the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, DOD is responsible for providing information to the local community when DOD has sole responsibility for the site and is jointly responsible for community relations activities with EPA where EPA and DOD share site responsibility. The MOU states that EPA and DOD must conduct response actions in accordance with the procedures established by the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). Section 300.61(c)(3) of the NCP requires that response agencies "be sensitive to local community concerns [in accordance with applicable guidance]."² As DOD

² The NCP is currently being revised. EPA anticipates that the provisions regarding community relations activities will be strengthened.

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explores what it means to be "sensitive to community concerns", it may wish to consider how the suggested program philosophy and activities outlined below can be tailored to the needs of its Installation Restoration Program.

SUGGESTED COMMUNITY RELATIONS PHILOSOPHY

EPA has found that there are a number of attitudes that are important for response staff to have and convey in carrying out a cleanup action:

- Consider the site's community relations program to be an integral part of the response effort. This requires building a close working relationship between technical response staff, public affairs staff, and any contractors supporting the Department's efforts.
- Recognize that citizen concerns are legitimate and that they need opportunities to express them and to have them considered seriously. Citizens living near DOD sites may believe that their health, their children's health, their water supplies, or their property values are threatened. In addition, they will have to live with the results of any response action long after the agency completes the action. Their concerns, therefore, should be addressed as early as possible in the response action.
- Be sensitive in your dealings with citizens. They are not adversaries. Particularly in any early meetings with citizens, make more of an effort to listen than to talk or explain the Department's position. Try to identify what citizens' real concerns (such as threats to health) are as opposed to their stated positions (such as demands for cleanup in a certain time period). Develop a communications program that responds to their real concerns.
- Acknowledge that citizens may provide the Department with valuable information. This information may take several forms: information about responsible parties; information about the extent of off-site contamination; information about health effects. Furthermore, some citizens may have a strong engineering or technical expertise that allows them to comment constructively on remedial alternatives being considered by the Department.

EPA has found that while this community relations philosophy appears to be straightforward, it is actually very difficult to implement and to do so consistently. DOD may encounter similar problems. For example, although DOD public affairs experts will probably be enthused about an active communications program, scientists and engineers working at the site may not be comfortable with the idea of meeting with citizens, answering their

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questions, and eliciting citizen input. In addition to sufficient resources allocated to community relations, two things are needed to make the philosophy work:

- Community relations training. Even if DOD's public affairs staff will have primary responsibility for conducting community relations activities at sites, DOD's technical response staff will also need to meet with citizens, participate in meetings, review citizen comments, consider how their input might affect response decisions, and help document how the Department responded to citizen input. To do these things well, most technical staff will require training in how to avoid conflict, in how to conduct and participate in effective meetings, in how to build good media relations, and in how to identify areas for citizen input.
- Top management commitment. Integrating community relations activities with the technical response program will not happen unless the Department's top management says that it must happen. With all of the pressing response efforts that go on at a hazardous waste site, community relations will always be given minimal attention unless the response program's top management emphasizes that it is a high priority.

SUGGESTED SITE ACTIVITIES

EPA's community relations program emphasizes that communications activities at Superfund sites should be tailored to the needs of the community. It includes, however, both required and highly recommended activities that were developed after an analysis of effective response actions across the country. DOD staff may wish to consult the guidelines for these activities that EPA has prepared for its staff with Superfund site responsibilities. [See U.S. Environmental Protection Agency, Community Relations in Superfund: A Handbook, September 1983.]

Based upon our assessment of those activities that have been most needed and useful at EPA sites, we suggest the following community relations activities for DOD's consideration. Again, because each site presents markedly different response and community relations problems, no one set of activities can be prescribed for all sites. We view the activities listed below as a model community relations program.

Activity 1: Conduct personal meetings with concerned citizens.

Before performing site work, DOD public affairs or technical staff (or both) can consider meeting with citizens affected by the site, local and state officials, and other concerned community members to identify their concerns. Experience has demonstrated the importance of early, personal contact between

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citizens and government response agencies. These meetings can be extremely useful for eliciting community input on the following:

- The level of public concern and the history of citizen involvement in seeking a solution to problems at the site;
- The types of information citizens would like to receive and the form in which they prefer to receive it (e.g., small group meetings, fact sheets, progress reports, news conferences);
- Citizens' perspectives on the history of the site and any potentially responsible parties of which they might be aware;
- The kinds of health and environmental problems citizens may have noticed that might have been caused by exposure to the substances found at the site;
- The existence of other citizens concerned about or having information about the site whom DOD should contact;
- Those elements of the response action of greatest interest to citizens; and
- The kinds of response actions citizens would like to see conducted.

Activity 2: Prepare a communications plan for the site

A community relations plan, based upon discussions with interested members of the community, can be a useful document for: detailing the Department's understanding of the major community issues; explaining how the Department will provide information and elicit citizen input; providing a schedule of communications activities; and listing DOD staff that citizens can contact with questions. This plan can be provided to or made available to interested members of the community.

Such a plan serves many useful purposes. It forces staff to identify major community concerns and think through how the agency will respond to them. It requires staff to identify points of community input and to make these known to the community. It is a good management tool for tracking program accomplishments. And, it demonstrates to the community that the Department is serious about its commitment to provide it with information and to provide it with opportunities for comment.

The plan obviously does not ensure that a good community relations program will be conducted at the site. But, without a plan, it is unlikely that a program that meets citizens' needs will be implemented.

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Activity 3: Implement a formal comment period prior to selecting the cleanup option

A formal comment period on the proposed remedial alternative is a good way to ensure that community views on DOD response actions are elicited. In addition, it would allow DOD to meet the National Environmental Policy Act's requirements for public participation.

During any comment period implemented by DOD on proposed response actions, DOD might find it advisable to conduct small group meetings or workshops to explain the results of its remedial studies. Prior to the close of the comment period, DOD might also wish to consider those areas where it has some flexibility in meeting citizen concerns and explore those areas with citizens. (For example, citizens might disagree with DOD's plan for the placement of site structures and DOD might be able to change its plans to accommodate citizen concerns.)

Activity 4: Establish an information repository

An information repository is a project file, located in a convenient location in the community that contains site information, investigatory reports, and other documents on site activities. It is being used as an effective information provision technique during a number of Superfund response actions such as the response at the New Bedford, Massachusetts site. The Acushnet River in New Bedford, Massachusetts has become contaminated with PCBs and heavy metals, forcing a ban on commercial and subsistence fishing and lobstering. Among the techniques that EPA is using to provide information to the local community is an information repository located in town halls and libraries in New Bedford and neighboring Fairhaven. EPA is including in the file information about PCBs, the known sources of the contamination, the most affected areas, and the schedule of site activities. Both technical documents and non-technical explanations of the documents are placed in the file.

Activity #5: Conduct small group meetings and workshops

EPA has learned from experience at a number of sites that large public meetings and formal hearings, traditionally the centerpiece of a public participation program, are often inappropriate vehicles for communicating information about response actions and for obtaining citizen input. Large public meetings can also exacerbate any existing adversarial relationships between citizens and the government, and prevent constructive discussions.

Small group meetings and workshops can be effective communications tools at sites in the following kinds of situations:

- DOD believes that citizen interest in the planned response action is high and citizens may desire a substantial amount of input into the response action and a substantial amount of interaction with Department staff.

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- The release caused (or is perceived to have caused) a number of health problems for residents near the site and these individuals need to receive detailed information and explanations of health studies.
- DOD's relationship with the community has not been good up to this point for any number of reasons and a closer working relationship with affected citizens would improve trust and cooperation.
- DOD has sufficient resources available to plan and conduct a series of informal meetings and workshops that are ultimately available to all interested citizens.

EPA has given considerable thought to how to plan and conduct small group meetings and workshops and can provide this information to DOD's community relations staff.

Activity #6: Provide progress reports

Progress reports are brief fact sheets describing past site work and the latest developments occurring during the response. They are more detailed than news releases and less detailed than background papers. Their target audience should include local officials, citizen leaders, civic and community organizations, and the media covering the site. For example, a progress report may contain information such as: the types and quantities of substances known to be at the site; the known extent of contamination; a brief explanation of ongoing activities; DOD's response plans over the next few months; and DOD contact staff. Progress reports can either be issued on a regular basis (say every month) or whenever important developments occur during a response (for example, the conclusion of a phase of the DOD response action).

Activity #7: Call or meet with citizen leaders frequently to inform them of progress

EPA has found that consistent, personal contact with citizens is the most important determinant of a successful community relations program. While frequent contact is resource-intensive in the short run, it is extremely cost-effective in the long run. There is no better way to demonstrate the Department's commitment to keeping the community informed and to eliciting its views.

SUMMARY

This paper has highlighted an approach to community relations activities at hazardous waste sites that has worked for EPA and may work for the DOD as well. This approach is based on the premise that citizens not only need information about hazardous substance response actions but also have the right

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to be involved in response decisions. It is an approach that is mutually beneficial to the community and to the government response agency. Under the program outlined above, citizens receive the information they need and have an opportunity to affect response decisions. The government agency in turn often receives needed information from citizens, gains community support for an efficient response action, and avoids counter-productive disagreements.

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MILESTONE CHART

<u>Milestone</u>	<u>Day</u>
Government Issuance of Change Order	0
Submit POA&M and Safety/Contingency Plan for Characterization Effort	10
Government Approval of POA&M and Safety/Contingency Plan	17
Initiate Characterization On-Site Investigations for Hadnot Point Industrial Area	45
Initiate Round Two Sampling, Verification Step	45
Initiate Potable Well Sampling	45
Submit Report with Round Two Results, Potable Well Results	125
Return of Government Comments	155
Complete Characterization On-Site Investigation	260
Submit Preliminary Report with Hadnot Point Characterization Step Results	290
Return of Government Comments	320
Submit Characterization Step Draft Report for Hadnot Point	350
Submit Preliminary Feasibility Step Report for Hadnot Point	380
Return of Government Comments	410
Submit Feasibility Step Draft Report for Hadnot Point	440

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