

**U.S. EPA Superfund Program's Policy for
Community Involvement at Radioactively Contaminated Sites - 9244**

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ABSTRACT

This paper describes the EPA Superfund program's statutory requirements for community involvement. It also discusses the efforts the Superfund program has made that go beyond these statutory requirements to involve communities, and what lessons have been learned by EPA when trying to conduct meaningful community involvement at sites. In addition, it discusses tools that EPA has designed to specifically enhance community involvement at radioactively contaminated Superfund sites.

SUPERFUND'S (CERCLA) STATUTORY AUTHORITY FOR COMMUNITY INVOLVEMENT

The Environmental Protection Agency (EPA) implements the Superfund program under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA). From the beginning of the Superfund program, Congress envisioned a role for communities. This role has evolved and expanded during the implementation of the Superfund program.

Initially, the CERCLA statute had community involvement requirements designed to inform surrounding communities of the work being done at a site. CERCLA's provisions required 1) development of a community relations plan for each site, 2) establishment of information repositories near each site where all publicly available materials related to the site would be accessible for public inspection, 3) opportunities for the public to comment on the proposed remedy for each site and 4) development of a responsiveness summary responding to all significant comments received on the proposed remedy.

In recognition of the need for people living near Superfund sites to be well-informed and involved with decisions concerning sites in their communities, SARA expanded Superfund's community involvement activities in 1986. SARA provided the authority to award Technical Assistance Grants (TAGs) to local communities enabling them to hire independent technical advisors to assist them in understanding technical issues and data about the site.

TODAY'S SUPERFUND COMMUNITY INVOLVEMENT PROGRAM: BUILDING STAFF CAPACITY AND BUILDING COMMUNITY CAPACITY

The Superfund Community Involvement Program has sought to effectively implement the statutory community involvement requirements, and at the same time to go beyond those requirements to find meaningful ways to involve citizens in the cleanup of sites in their communities. We've structured our program around two main themes, building capacity in staff to enable them to be effective in working with communities, and building capacity in communities to enable them to be knowledgeable about the site(s) in their communities, and to provide them with constructive ways to discuss and resolve site issues.

Building Capacity in Staff

There are three key areas the Superfund program concentrates on when we seek to build capacity in our staff so they can be effective in working with communities. These areas are: 1) management support, 2) training, and 3) recognizing staff.

Management Support

In Superfund, community involvement starts with leadership from our top managers. The top managers in our organization set clear expectations that 1) community involvement is an important part of a site cleanup, 2) site managers are expected to pay attention to community involvement just as they do to the technical aspects of their jobs, and 3) community involvement coordinators are integral members of site teams.

Training

A key part of building capacity in staff to ensure they are effective when working with communities is to provide them with a variety of training opportunities. When staff are confident in their abilities to listen to the public, communicate with the public, and effectively resolve conflicts that arise, community involvement no longer appears to be a daunting aspect. We created the Community Involvement University to provide opportunities for Superfund site team members to build skills needed for successful cleanup efforts in communities. Some of our regional offices also have developed successful "Outreach Certificate Programs."

Recognizing Staff

In addition to evaluating staff on the basis of their work with communities, we have found it to be effective to recognize staff at a regional and national level for their community involvement work. In 1997, we instituted a national community involvement coordinator of the year award. In 1998, we instituted an award to recognize site managers who are particularly effective in working with communities.

BUILDING CAPACITY IN COMMUNITIES

Technical Assistance

The cornerstone of our efforts to provide technical assistance to communities is our Technical Assistance Grant (TAG) program. Under the TAG program, community organizations can apply for an initial grant of up to \$50,000. TAG recipients use these funds to hire their own independent technical advisors to assist them in reviewing site

related documents, and developing comments on a variety of areas such as sampling plans, risk assessments, proposed cleanup plans, ongoing operation and maintenance activities, etc.

A corollary to our TAG program is the Technical Assistance Services for Communities (TASC) program. The TASC program was developed to provide independent, non-advocacy educational and technical assistance to communities affected hazardous waste sites regulated by CERCLA and the Resource Conservation and Recovery Act (RCRA). The purpose of TASC is to help communities have a better understanding of hazardous waste issues so they can participate in the hazardous waste cleanup process more effectively.

Community Advisory Groups (CAGs)

What communities also need are procedural ways to be involved. In 1995, we started the Community Advisory Group (CAG) program. Through the CAG program, we seek to bring together early in the process a broad group of stakeholders, e.g., residents, local business owners, local government officials and others, who are interested in the work going on at the site in their community. We seek out people in the community who want to be involved in the process, and facilitate their involvement. The credibility of a CAG is a function of its inclusiveness. It must represent all stakeholder interests in order to ensure it is a voice for the entire community rather than a few interested parties.

Since 1995, we have conducted several case studies of CAGs. One important lesson we've learned from these studies is that CAGs are most successful when formed early in the cleanup process. We also have found CAGs are a more effective way to involve communities than traditional public meetings. CAGs help establish an ongoing forum for discussing and resolving issues and concerns. CAGs also provide an opportunity for EPA, the community and other interested parties to take the time to examine and discuss detailed information about a site.

TOOLS FOR RADIATION SITES

EPA has developed two tools to facilitate public involvement at radioactively contaminated Superfund sites which may be found at the following webpage: <http://www.epa.gov/superfund/resources/radiation/radcomm.htm>. Both of these products were intended to help the general public, site decision-makers, and community involvement coordinators at radioactively contaminated Superfund sites.

The first is a booklet entitled "Common Radionuclides Found at Superfund Sites." The information in this booklet is intended to help the general public understand more about the various common radionuclides found at Superfund sites. The booklet contains 12 radionuclide-specific fact sheets that answer questions such as: How can a person be exposed to the radionuclide?, How can it affect human health?, How does it enter and leave the body?, What levels of exposure result in harmful effects?, and What recommendations has EPA made to protect human health from the radionuclide?

The second is a video entitled "Superfund Radiation Risk Assessment and How you can Help, an Overview." This 19 minute video describes the Superfund risk assessment process for radioactive contamination: what it is, how it works, and most importantly, how members of the public can be involved.

EPA prepared the Superfund Community Involvement Toolkit to provide Superfund Regional Site Teams and other staff with a practical, easy to use aide for designing and enhancing their community involvement activities. The Toolkit also is intended to help avoid the pitfalls common to the community involvement process. The Toolkit enables EPA's community involvement staff and Regional Site Teams to quickly review and adapt existing community involvement tools, such as public notices, presentations, and community interviews, to their own needs. In addition, the Superfund Community Involvement Toolkit lists useful references and resources available to community involvement staff and provides examples of a wide range of outreach and educational materials. Electronic versions of many of the materials referenced in the Toolkit (templates, sample documents, fact sheets, etc.) have been assembled and can be accessed at the following webpage: <http://www.epa.gov/superfund/community/toolkit.htm>

SUMMARY

In summary, the Superfund program devotes substantial resources to involving the local community in the site cleanup decision making process. We believe community involvement provides us with highly valuable information that must be available to carefully consider remedial alternatives at a site. We also find our employees enjoy their jobs more. Rather than fighting with an angry public they can work collaboratively to solve the problems created by the hazardous waste sites.

We've learned the time and resources we devote at the beginning of a project to developing relationships with the local community, and learning about their issues and concerns is time and resources well spent. We believe the evidence shows this up-front investment helps us make better cleanup decisions, and avoids last minute efforts to work with a hostile community who feels left out of the decision-making process.