

## 7.0 COMMUNITY INVOLVEMENT DURING SITE CLOSEOUT

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This section addresses community involvement during each of the key milestones in the environmental site closeout process. The proposed activities are designed to help installations plan and implement an ongoing community involvement program that will inform interested citizens and local officials about the progress of remedial activities at DoD installations. Table 7.1 lists required and suggested community involvement activities during the site closeout process.

Community involvement is a critical element of the overall environmental site closeout process, promoting understanding and building trust in DoD Component environmental stewardship initiatives. CERCLA defines the process and timetables for community involvement. It is the main planning tool for community outreach activities. The IRP process, as regulated by CERCLA, defines program goals and initiatives to be undertaken for each phase of the IRP process. It also defines the vehicles to be used for communicating site activities and timetables for accomplishing goals.

Past installation restoration program experience has shown that community involvement beyond that strictly required by law is often appropriate and beneficial. In fact, numerous EPA and DoD guidance documents describe suggested public participation activities (see Section 9). In most cases, however, these documents do not address community involvement activities beyond remedy selection.

Appropriate public participation activities are necessary to fulfill the spirit and the statutory goals of CERCLA and RCRA, and to ensure that the public remains adequately informed during completion of environmental response actions. However, relatively few statutory and regulatory requirements exist that specify community involvement activities that should be undertaken after remedial action decisions. Where such requirements exist, they have been incorporated into the environmental site closeout process described in the preceding Sections 3 and 4. These required activities are also referenced in the text box to the right.

### **Community Involvement Activities within the Site Closeout Process**

- Public Notices
- Fact Sheets
- Restoration Advisory Boards
- Briefings
- Public Comment Periods
- Notices of Availability of Documents
- Information Repository/Administrative Record
- Technical Assistance

A successful community outreach program and its legally-driven subset, community involvement, extend environmental stewardship beyond the dictates of regulatory requirements. The goals and objectives of the program are to:

- Ensure public understanding that human health and the environment are of paramount interest to DoD.
- Understand and be concerned about community attitudes and information needs. Address these needs through prompt release of factual information utilizing media and other dissemination mechanisms.
- Create and maintain a climate of understanding and trust in DoD environmental initiatives to protect and clean up the environment.
- Use strategies that are suited to engage the public and ensure a two-way communication process is maintained.
- Maintain a reputation as a good neighbor, as well as a respected professional organization charged with part of the responsibility for protecting national security.

Table 7.1 Public Participation Activities during the Site Closeout Process

Public Participation Activities	Remedial Action Construction	Remedy in Place	Remedial Action Operation	Operating Properly and Successfully	Response Complete	Long-Term Monitoring	Site Closeout	Installation Completion	EPA NPL Delisting	EPA Five-Year Review
Contact State/Local Officials	■		■				■	■		■
Maintain Community Dialogue	■		■		■	■				
News Release					■	■		■	■	
Press Briefing	■		■		■					
Workshops	■									
Public Exhibits, Open Houses	■				■					
Community Interviews	■									
Revise/Review CRP	■			■						
File in Admin. Record/ Info. Repositories			■	■	■	■	■			
Publicize T/A		■	■							
Maintain Mailing List			■							
Fact Sheet/News	■	■	■		■	■				
Public Notice		■	■					■	■	
Public Meeting/Brief		■	■		■	■	■	■		■
Public Input			■							
Comment Period									■	

■	Suggested Activity
■	Required Activity

- Identify issues and potential areas of concern, and develop and implement objective means to avoid or resolve conflict.

DoD Components use various mechanisms to communicate the progress of environmental programs. These tools can be:

- Meetings: Public, Small Groups, RAB
- Public Information Sessions: Workshops, Tours, Exhibits
- Direct Mailings: Fact Sheets, Newsletters, Progress Reports

The activities contained in this section are suggestions; each installation should tailor its community involvement program to the specific requirements of that location. In some cases, outreach activities beyond those listed here may be appropriate; in other cases, a much more limited program may be adequate. Communities vary from place to place. Each community or geographic area has its own character, structure, personalities and problems.

The suggested activities include guidelines regarding the types of locations for which the particular activities might be suited, with more elaborate activities suggested for installations with higher levels of public involvement.

A high level of community interest can be anticipated if a selected remedy is no longer protective of human health and the environment, contaminants migrate off base/site, the remedy fails to perform as expected, or new contamination is discovered. The local redevelopment authority may change its land use plan, lessees or sublessees may disturb a remedy in place, or an institutional control may be proven ineffective. These changes may trigger strong community reaction.

Community interest can heighten or diminish at any time during the site closeout process. Concern for the environment most frequently arises when environmental activities are perceived as a threat to health or property value. The most passive community member can become an activist if any of these conditions are met.

As site closeout approaches, the public may have concerns about risks to health, safety, environment and even aesthetics of surrounding landscape. Appropriate public participation activities are necessary to fulfill the spirit and the statutory goals of CERCLA and RCRA, and to ensure that the public remains adequately informed during completion of environmental response actions. It will be important to incorporate potential concerns into community outreach programs.

Installations will need to keep abreast of community sentiments and concerns of special populations in order to respond appropriately. Wherever there is DoD/community interaction, public attitudes and opinions about the DoD are formed – good or bad. For example, a previously adjourned RAB's decision to reconvene or apply for technical assistance for other community activities may suggest a shift in public interest. At regionalized operating locations, it will be important to assure communities that departure of a DoD presence does not equate to abandonment of our environmental responsibility.

In all cases, these activities should be considered recommendations. Only those who are familiar with a particular installation can tailor an appropriate community involvement strategy.

## **7.1 Restoration Advisory Boards**

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The community's interest in the cleanup program will likely continue throughout site closeout. Their role on the RAB is prescribed by law and environmental conscience. It is a role that will increase before it diminishes.

By the time RA-C is reached, all remedial action decisions are made, and the RAB's mission has been met, and its advisory role into the decisionmaking process is fulfilled.

Beginning with the **Remedial Action Construction (RA-C)** phase, members of the RAB may want to review the plan for what happens after the last remedy is put in place, including when key milestones occur, and the process for reviewing future documents. In developing the work plan, consider the role of the RAB if remedies fail to achieve the results intended and RAB input is required to select a new remedy.

This would also be an opportune time to poll for RAB consensus on their future status. RAB options are to:

- Convert to an inactive status
- Meet less frequently
- Meet at key milestones
- Plan to dissolve after a 2-year waiting period, agreeing to reconvene for the Five-Year Review.
- Establish a phaseout or inactivation date
- Transition to a Community Advisory Board or a Technical Review Committee (active bases)

Sound judgment in how to approach this subject is critical to avoid creating the impression that any decision has been made in advance of the RAB's opportunity to participate in the decisionmaking process. Keep in mind that the RAB is representative of the community's demographics and serves as the liaison between the community and the DoD Component. RAB members are the continuity for our environmental programs, and as such, inject a "common sense" approach into a highly technical government process. In some cases, RAB meetings are usually the only forum that exists for ongoing dialogue with communities.

Following are specific milestones in the IRP process where the RAB could have an integral role in reaching environmental site closeout.

**Last Remedy in Place (RIP):** When the last remedy has been put in place, a RAB meeting could be the vehicle used in the IRP process to:

- Update the progress of remedial actions;
- Explain the scope and impact of site activities;
- Address and discuss site-related health and safety issues, future site management strategies, the state's role after completion of remedial actions, who will be responsible for O&M activities, and emergency contacts; and
- Answer questions.

At this time, the RAB may be interested in reviewing the interim remedial action report, and if it has not been discussed previously, determine the future status of the RAB, including deactivation or reduced frequency of meetings.

**Remedial Action Operation (RA-O):** During submittal of an amended ROD or permit (see task numbers 3.3-7.1 and 4.3-7.1), a RAB meeting is an appropriate venue for discussing any new remedial alternatives, following guidance for the IRP Remedial Design phase.

**Response Complete (RC):** After issuance of the letter accepting the RA Report (under CERCLA; see task number 3.4-3), or preparation of a response to comments and issuance of a permit modification (under RCRA; see task number

4.4-6), the RPM/BEC could convene a RAB meeting to discuss the Remedial Action (RA) Report, Long Term Monitoring (LTM) Plan, and final Closeout Report or RCRA Corrective Action Complete report.

**Long Term Monitoring (LTM):** Plan opportunities for RAB members to observe sampling data and tour sites where remedial action equipment is in operation.

**Site Closeout (SC):** Upon *completion of reports*, a RAB or public meeting would be appropriate to discuss the RA Report, LTM Plan and Final Closeout Report or RCRA Corrective Action Complete document. When the site closeout phase is reached, highlight the accomplishments of the installation's environmental program and the contributions made by the RABs, LRAs. Consider thanking them for their efforts at a ceremony, appropriately planned for this occasion.

**Installation Completion (IC):** When *every site/OU at the installation has reached site closeout*, issue letters to disband in accordance with the prescribed schedule, and certificates of appreciation. Encourage the RAB to prepare a closeout report.

*For CERCLA closeouts only, during conduct of Five-Year Review(s) (see task number 3.8), a RAB (if it exists) meeting may be convened.*

**Operating Properly and Successfully (OPS):** Notify RAB members when you reach this milestone.

## 7.2 Additional Outreach

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*Installations with major findings or high levels of interest may require more frequent contact than those bases with small programs and minimal public interest. You must decide whether you will need more or less. **External Affairs or Public Affairs representatives can assist you in determining if any of the following strategies and activities are best suited to your situation for fostering an understanding of site activities.***

- A hot line or toll-free number for residents to call with questions and/or concerns about site activity
- Public tours of the site or operable unit, including a demonstration of the equipment to be used
- Viewing platforms, if appropriate, to allow the community and media to monitor the progress at sites/OUs and better understand the work being done
- Workshops or other public forums to explain highly technical or complex information to the community, involving pictorial exhibits
- Status reports through regular meetings with community groups, interested parties and public representatives
- Exhibits in convenient public locations to allow the community to follow activities and progress occurring at sites/OUs
- Direct mail news bulletins
- Media symposiums
- Access by residents to monitoring data
- Translation services for communities with multinational demographics

At BRAC installations, in particular, the community's role and involvement in the successful transition of their communities from DoD use to civilian reuse are vitally important. Communities not only have a need to know, but a right to have input into the decisions that will affect them and their communities.

## 7.3 Suggested Activities

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Sections 3 and 4 described community involvement activities required by law or regulation. The following sections outline additional, suggested activities that may be appropriate for inclusion in an installation's public participation program.

### 7.3.1 Remedial Action Construction (RA-C)

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A significant amount of activity takes place during the construction phase. As this phase begins and activities increase, the installation should continue implementing an effective community relations program.

This would be the best time to establish a point of contact at the installation to ensure that community concerns are addressed in a timely and accurate manner by a person who is knowledgeable about the project. The presence of an on-site contact is especially important during the first week of remedial action construction, since citizens and the media may have questions and concerns about site activity and its effects. These concerns will focus primarily on visible activities during this time, and community outreach activities will need to respond to a broad scope of community concerns and questions. Citizens may have questions about traffic, equipment, noise and dust in the air. They may also have concerns about the need to temporarily relocate and the impact of property easements and acquisitions, or the need to take safety precautions for short periods of time. The installation may address these concerns and questions through some of the activities described below.

- Before work begins, consider sending letters to adjacent residences and businesses to notify them of impending activities.
- Brief key groups, such as the Restoration Advisory Board, Local Redevelopment Authority, community leaders and key elected officials, of impending activities.
- Press briefings will ensure the media has accurate and timely information for dissemination to the public.
- Revise the Community Relations Plan (referred to as a Post Remedial Action Update) based on interviews with community members about their concerns and how they would like the DoD to communicate with them through site closeout.
- Produce a fact sheet or newsletter summarizing activities
- Develop a fact sheet on the Final Field Engineering Design for dissemination to the community relations mailing list.

### 7.3.2 Remedy in Place (RIP)

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Once the remedy is demonstrated to be functioning properly, public notification of this milestone is advisable. Furthermore, when the last remedy is in place (LRIP), RAB, public, and/or small group meetings could be conducted to: (a) update the progress of remedial actions; (b) explain the scope and impact of site activities; (c) address and discuss site-related health and safety issues, future site management strategies, the state's role after completion of RA, who will be responsible for O&M activities, and emergency contacts; and (d) answer

questions. Installations may prefer to conduct additional meetings at least annually. Finally, if it has not been discussed previously, determine the future status of the RAB, including deactivation or reduced frequency of meetings.

*For CERCLA closeouts only, during preparation and submittal of the interim RA Report*, the RAB may be interested in reviewing the interim remedial action report. The general public may also be notified that the report is available. At the last remedy in place (LRIP), consider future management strategies (e.g., regionalization) and how to coordinate with the various interested stakeholders.

### 7.3.3 Remedial Action Operation (RA-O)

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Outreach efforts during this phase are likely to be less intense than in the earlier phases of a remedial response when the public is more likely to express its concerns. However, public concerns do not necessarily vanish with the placement of the remedy. The public may continue to have health concerns, or questions about site safety or long-term use of the site. There should be a continuation of efforts to monitor community concerns, exchange information and meet with community residents to discuss their concerns, where appropriate. When the remedial response shifts from remedial action construction to remedial action operation, you may anticipate the following events.

- *Planned and unplanned shutdowns.* Unplanned shutdowns of remedies may be disconcerting to those living near the site; they may fear a new danger at the site. To prevent the public from becoming alarmed that a new danger has been discovered, they should be informed well in advance of scheduled shutdowns of remedies for maintenance, to the extent possible.
- *Changes in the appearance of the work site due to weather conditions.* If, for example, the weather suddenly becomes much cooler, the water vapor above an air-stripping tower may condense into a visible plume. Some citizens may fear that an explosion has occurred. To prevent or address these fears, the public should be told in advance, and reiterated periodically in writing, what to expect.
- *Organizational changes.* To some citizens, changes in and/or the departure of DoD Component staff and contractors from the installation may be disconcerting. Staff should ensure that the community understands the long-term plans for the installation and knows which state and local officials will be ultimately responsible. Assure residents that the sites may be restored to other uses within the community, as appropriate.

The final remedial action operation plan (O&M plan, sampling & analysis plan [SAP]) could be filed in Administrative Record/Information Repository.

*During performance of the RA, conduct of routine sampling and analysis, and implementation of institutional controls*, ensure that the administrative record/information repository is updated at least quarterly. It will be important to maintain mailing lists so that all local residents, elected officials and media can receive information and remain informed about activities. Installations will need to maintain a dialogue with the community to keep them apprised of any significant changes in plans, i.e., updated technical decisions resulting from new developments and changes if the remediation does not work. Conducting press briefings throughout RA-O will help to ensure the media has accurate and timely information for dissemination to the public.

*During submittal of an amended ROD/permit*, a RAB/public meeting could be convened to discuss new remedial alternatives, as appropriate (following guidance for the IRP Remedial Design phase). If a fact sheet or newsletter is used to update the public with new information or to report progress, be sure to send it to the community involvement mailing list.

*For CERCLA closeouts only, during conduct of Five-Year Review(s), the following activities could be conducted. Confirm site/OU status with local officials and/or community members, followed by documentation of the content of those discussions. Note that the performance reporting requirements under RCRA fulfill the functional requirements for Five-Year Reviews.*

After the remedy has been implemented, community involvement activities may include educating citizens about the state's role after completion of remedial action. Some of the following activities may be considered:

- Public ceremony and site tour to highlight accomplishments
- Fact sheet highlighting the completion of remedial action; upcoming LTM activities; who will be responsible for LTM; contacts for unexpected events or health emergencies
- Public information session to allow citizens to discuss concerns about the site and related issues and to describe what will happen next.

### **7.3.4 Response Complete (RC)**

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*After issuance of the letter accepting the RA Report, or preparation of a response to comments and issuance of a permit modification (under RCRA), convene a RAB/public meeting to discuss the Remedial Action Report, Long Term Monitoring Plan, and final Closeout Report or RCRA Corrective Action Complete report.*

*During modification, optimization, and/or maintenance of institutional controls, provide information and continued outreach to community members, schools, and local organizations on site/OU-related health and safety issues via fact sheets, signs posted at sites/OUTs, notification to news media, etc. A strategy for ensuring public awareness of institutional controls through signage, etc. is also recommended.*

*During preparation and approval of the Long-Term Monitoring Plan or preparation and submittal of the post-closure monitoring and maintenance plan (under RCRA), the following activities could be conducted. A RAB/public meeting could be convened to review the long-term monitoring and maintenance plan (for CERCLA closeouts), or to review the post-closure monitoring and maintenance plan (for RCRA closeouts). Maintenance schedules could be published annually. Also, a fact sheet could be prepared to explain monitoring procedures.*

*During decommissioning of RA equipment and wells as appropriate, or demonstration of clean closure (for each regulated unit under RCRA), a public tour of clean closure and/or remedial action equipment decommissioning could be conducted [for high public involvement].*

*After Final COR signature; and once the signed COR has been forwarded to EPA HQ (under CERCLA), the following activities could be conducted. Site personnel could gauge public concerns at each site/OU, including conduct of site/OU tours and availability sessions to let community members see/hear about response completion. A news release could be prepared and/or a press conference held to announce remedy completion, and preview long-term monitoring and site/OU closeout activities. Community questions/concerns about property values and future use could be addressed, including how they may have been affected by remedy implementation. Information could be provided to address questions about long term monitoring and associated costs.*

Upon completion of reports, a RAB or public meeting would be appropriate to discuss the Remedial Action Report, Long Term Monitoring Plan and final Closeout Report or RCRA Corrective Action Complete. A press information update and fact sheet/newsletter summarizing those reports may also be appropriate. Finally, appropriate reports could be filed in the administrative record/information repository.

### 7.3.5 Long-Term Monitoring (LTM)

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*Upon implementation of LTM or post-closure care in accordance with permit/plans*, the activities described below could be conducted. The administrative record/information repository could be updated quarterly. A press release could be issued to announce the availability and implementation of a Long-Term Monitoring Plan, including any associated institutional controls. Community involvement tools could be prepared and released at regular intervals as required, including fact sheets, public meetings, newsletters, etc.

*While monitoring to determine the continued effectiveness of the remedy*, long-term monitoring data and site status could be made available. Sites should also consider electronic vehicles, written materials (flyer to each house), and updates to local governments and organizations.

### 7.3.6 Site Closeout (SC)

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Moving from Remedial Action to the Site Closeout phase is a major achievement in the Installation Restoration Program process. *As DoD personnel terminate active management of a site*, the community involvement activities described below should be considered.

The information repository could be updated to guarantee that the public has access to up-to-date information about activities; this could include a conversion to CD-ROM. A POC for ongoing maintenance could be established at this time. Public affairs/community relations support needs could also be determined. A toll-free telephone hot line could be established to ensure immediate public input on site activities and efficient response to questions and concerns.

*During initiation of a long-term site-management transition, as appropriate*, meetings with LRA, elected officials and key community groups could be conducted to inform them of the DoD Component's impending actions.

This is an ideal time to seek additional outreach opportunities to enhance DoD's image and promote positive interaction with the community and the media as we clean up areas of historical contamination. A passing grade from the regulators at this milestone is a success story waiting to be broadcast. Now is the time to write those stories. Highlight the accomplishments of your environmental program and the contributions made by regulatory agencies, RABs, LRAs and elected officials and community groups. Thank them for their efforts. This can also be done at a ceremony, appropriately planned for this occasion. These stories deserve to be told so that the media will also laud the DoD's environmental good news.

### 7.3.7 Installation Completion

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The public could be notified that the requirements of the FFA have been met, including issuance of a press release. Letters to RAB members to disband could be prepared in accordance with any prescribed schedules. Certificates of appreciation could be issued, and the RAB may prepare a closeout report.

*While completing long-term site management strategies*, affected stakeholders (LRA, RAB, media, elected officials, police and emergency response units) could be notified of DoD Component points of contact for questions, concerns, or emergencies prior to public announcement and actual closure. Meetings with LRA, elected officials and key community groups could be conducted to inform them of the DoD Component's impending actions.

This is an ideal time to seek additional outreach opportunities to enhance the DoD's image and promote positive interaction with the community and the media as we clean up areas of historical contamination. A passing grade from the regulators at this milestone is a success story waiting to be broadcast. Now is the time to write those stories. Highlight the accomplishments of your environmental program and the contributions made by regulatory agencies, RABs, LRAs and elected officials and community groups. Thank them for their

efforts. This can also be done at a ceremony, appropriately planned for this occasion. These stories deserve to be told so that the media will also laud the DoD's environmental good news.

### 7.3.8 Five-Year Reviews

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When waste is left in place at a site, a review of the remedial action under CERCLA must take place at least every five years.

*During conduct of site/OU visits, inspection(s), and interviews,* the RPM/BEC is encouraged to confirm the site/OU status with local officials and/or community members, contact appropriate official(s)/persons, and document the content of those discussions.

A RAB (if it exists) and/or public meeting could also be convened at this time. The Five-Year Review should be filed in the administrative record and information repository. The EPA fact sheet on Five-Year Reviews could be made available to RAB members and interested citizens.

### 7.3.9 Operating Properly and Successfully (OPS) Demonstrations

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*Upon performance of an OPS demonstration,* the activities described below should be considered.

Update the Community Relations Plan to include activities that will increase the community's awareness of site/OU transition(s) to other uses and to other agency oversight, if appropriate. Affected parties could consider joint participation to raise visibility of new owners and regulators (new caretakers). The above activities could also be conducted *upon property transfer by deed*. Finally, any OPS determination could be filed in the administrative record/information repository.

This is an ideal time to let the local community know of our joint success and mark this milestone with appropriate recognition of its significance.