



Community Involvement Resource Assessment of States and Territories

**FINAL REPORT
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ASTSWMO is an organization supporting the environmental agencies of the States and Territories. ASTSWMO's mission is to enhance and promote effective State and Territorial programs for waste and materials management, to encourage environmentally sustainable practices, and to affect relevant national waste and materials management policies. The mission of the Community Involvement Focus Group is to promote effective community involvement strategies and activities throughout State, Territorial, and federal cleanups. This includes researching current and emerging community involvement policies and strategies; coordinating with federal agencies in the development of new policies and strategies; and developing resource and educational materials for State and Territorial solid waste management and hazardous waste cleanup programs.

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I. Introduction

In 2007, the Association of State and Territorial Solid Waste Management Officials (ASTSWMO) Community Involvement Focus Group published a survey report to assess the current status of community involvement programs at federal facility sites throughout the States, Territories, and the District of Columbia (States). Through this survey, wide discrepancies in the management, focus, and importance of community involvement programs were noted. While most States emphasized a significant need for community involvement in their cleanup sites, of the 33 States responding, only six States indicated that staff was specifically assigned to work on community involvement as their main responsibility. The 33 States that responded to the 2007 survey represent a total of 1,860 federal facility sites, but only 182 sites were actively performing any of the community involvement activities listed in the survey.¹

In December 2009, the U.S. Environmental Protection Agency (EPA) Office of Solid Waste and Emergency Response (OSWER) developed the Community Engagement Initiative (CEI). The CEI was “designed to enhance engagement with local communities and stakeholders to help them meaningfully participate in government decisions on land cleanup, emergency preparedness and response, and the management of hazardous substances and waste.”² The initiative provided an opportunity for U.S. EPA staff to refocus and renew its vision for community engagement, develop new tools and guidance, and apply them consistently in their processes. According to the initiative, “Effective community engagement cannot happen without the dedicated, hard work of U.S. EPA regional, state, tribal and local government officials.” It is in this vein that the ASTSWMO Community Involvement Focus Group expanded their 2007 research beyond federal facility sites and took a broader and closer look at community involvement within States where U.S. EPA specifically funds a program.

II. Methods

In 2012, the Focus Group members requested information from all 56 States in order to better understand and compile a record of State resources available, including financial and staffing, for conducting community involvement activities. The focus of this request was twofold:

- 1) What specific community involvement activities are being conducted and by whom?
- 2) How are community involvement activities implemented throughout the States, specifically in relation to U.S. EPA funded programs?

The Focus Group asked that each State coordinate data collection with members from specific State waste and remediation programs prior to submitting the State response, with the caveat

¹ http://www.astswmo.org/Files/Policies_and_Publications/Federal_Facilities/CommunityInvolvementWebversion.pdf

² <http://www.epa.gov/oswer/engagementinitiative/>

that the programs must receive U.S. EPA funding. The State program areas chosen, after consultation with the ASTSWMO Program Steering Committee (PSC), were:

- Resource Conservation and Recovery Act (RCRA) - Compliance Monitoring and Enforcement, Permitting, Corrective Action
- Tanks - Prevention and Cleanup
- Brownfield, Land Revitalization, Voluntary Cleanup
- Federal Superfund –National Priorities List (NPL)
- Federal Facilities - Oversight, Compliance
- Other (Explain)

The information request included a total of eight questions and narrative boxes were offered with each question to allow additional information to be provided, or to allow for elaboration about successes or challenges that may not be captured in the questions. State data was collected through the end of 2012 and the results of the data collection are finalized in this report.

This report details the findings of this information request, describing the methodology, limitations, and findings for each program where the U.S. EPA plays a role either directly or indirectly through funding. Based on these findings, the Focus Group identified general trends across programs and made a series of recommendations detailed at the end of this report.

III. Limitations

Response Rate

The Focus Group contacted all 56 States and received responses from 21 States for a response rate of 37.5%. Response rates also varied within each program, with federal facilities providing the fewest responses (11 of 56 States (19.6%)), and RCRA providing the most responses (20 of 56 States (35.7%)). Nonresponse is a problem for most information requests as it arises from the fact that there are usually differences between the ideal sample pool of respondents and the sample that actually responds to a survey and can create nonresponse bias.

Response rates of only 40 or 50 percent can create results that are misleading or even erroneous since the results may reflect an inordinate percentage of a particular portion of the targeted sample. It is unclear in this particular case if the response rate was relative to groups targeted (i.e., some States have no resources or time available to respond) or more related to the fact that the targeted audience has been contacted frequently over the past several years by ASTSWMO Subcommittees, Focus Groups, and other organizations on a variety of issues, and may be suffering from “survey fatigue.”

Interpretation or Misunderstanding of the Questions:

Misunderstanding of the questions asked can contribute to inaccuracies in the data. Discussions between the Focus Group members revealed that although each member participated in the development and review of the final information request, when Focus Group members answered the request on behalf of their respective States some provided answers with different understandings.

For example, Question 2 asked, “At approximately how many sites, within each program, is your State actively conducting oversight?” The term “site” can have several different meanings. Certain States or programs define the term “site” as the operating facility as a whole; others may use the term “site” to refer to an area of concern or operable unit. It becomes obvious that there will be inconsistencies in the data when comparing the number of “sites” as a fence to fence facility versus a “site” as an individual area of concern since a facility can have many areas of concern.

Or the follow-up question: “Of the number of sites provided above in Question 2, on average, approximately how many of these sites are conducting community involvement activities at any given time?” Since the information request revealed that most States do not have resources dedicated specifically to community involvement – in many cases the community involvement responsibilities rest with the technical staff and managers -- they may interpret the term “community involvement activities” very differently. In addition, since the respondents areas of expertise may be something other than community involvement they may be unfamiliar with terms used in the information request and may view community involvement activities as nothing more than placing a newspaper advertisement.

In another more nuanced example of how the questions could be interpreted differently, Question 8 asked, “What types of community involvement activities do your agency’s programs currently conduct?” The list of activities the respondents chose from included “Hosting or assisting with public availability sessions,” “Hosting or assisting with public hearings,” and “Hosting or assisting with public meetings.” Although each one of these activities has distinct components associated with them, the person answering the question may not be aware of these distinctions.

Organization Differences within States/Programs:

The structure of U.S. EPA funded programs varies from State to State. This variation resulted in discrepancies in how the data was reported. In some cases, the person responding to the questions works and answered for one or a subset of the U.S. EPA funded programs and provided limited information.

In other cases, States have staff specifically devoted to community involvement for some of the U.S. EPA funded programs and not others. Therefore, the community involvement

responsibilities are fulfilled by project managers, engineers, or responsible parties depending on the organizational structure of the agency. Some States have offices specifically dedicated to community relations activities, but these offices often provide support to entire State waste/site remediation programs and are not dedicated to U.S. EPA funded programs exclusively. Some States also receive outside support on an ad hoc basis, so numbers were difficult to quantify.

IV. Summary of Program Information

A summary of the information provided by States is provided in this section and organized by the five program areas used in the information request:³

- RCRA - Compliance Monitoring and Enforcement, Permitting, Corrective Action
- Tanks - Prevention and Cleanup
- Brownfield, Land Revitalization, Voluntary Cleanup
- Federal Superfund - NPL
- Federal Facilities - Oversight, Compliance

For each program area, an overview of Federal regulations and policy, a summary of State data submitted, and Focus Group findings are provided.

RCRA

“Public participation” during RCRA corrective action originates from a framework of statutory requirements, regulations, and U.S. EPA guidance. At the federal level, corrective actions may take place under a RCRA permit or as an enforcement order under §3008 of RCRA. In authorized States, corrective action may take place under a State-issued RCRA permit, a State cleanup order, a State voluntary cleanup program or another State cleanup authority.

RCRA permits require public participation in the form of public meetings, public notices, public comments/responses, and the establishment of information repository at prescribed points in the permit process. There are no regulatory requirements for RCRA orders; however, public participation activities are encouraged in guidance to be equivalent to those for RCRA permitting. In addition, the agency may request the facility conduct additional activities as a term in the order. When corrective action is conducted under alternate authorities, such as voluntary corrective actions, public participation is required at three key stages: (1) when the agency first becomes involved; (2) during remedy selections; and (3) prior to making the decision that corrective action is complete.

A significant portion of the RCRA corrective action process is analogous to a Superfund process, and due to this similarity, U.S. EPA encourages permitting agencies and facilities to make public

³ Two respondents provided information for “Other” programs; one for its Landfill Closure Program and the second for its Private Superfund Program. This information is not summarized because the Focus Group did not have additional States’ information for comparison.

participation activities under the RCRA system consistent with those activities required under Superfund.

Summary

Twenty (20) States provided information specific to RCRA programs. Respondents indicated that there are currently 8,736 active sites overseen by 643 full-time employees (FTEs) in their programs, averaging 14 sites per FTE. Of these sites, approximately 1,716 are undergoing some form of community involvement with roughly seven FTEs providing community involvement support for their programs. This equates to the RCRA program facing the highest number of sites per capita (1,285).

Findings

- Most States do not have staff specifically dedicated to conducting community involvement in their RCRA programs. Consequently, conducting community involvement activities is the responsibility of project managers and project engineers.
- Although most State RCRA programs do not receive U.S. EPA funding that is to be dedicated for conducting community involvement activities, the public participation framework developed under RCRA further expands citizen opportunity for involvement well beyond agency-wide requirements.
- U.S. EPA encourages equivalent public participation procedures under RCRA and Superfund because cleanups often involve similar issues in the two programs. However, respondents indicated that the Superfund program has 48 sites per Community Involvement FTE compared to RCRA, which has approximately 1,285 site per Community Involvement FTE.

Tanks

States are authorized to implement and enforce underground storage tank (UST) programs provided that the State programs are as stringent and comprehensive as federal UST program requirements. Federal regulations (40 CFR 280.67) require certain community engagement activities related to leaking underground storage tank (LUST) sites once a corrective action plan (CAP) is required. The federal requirements for public participation for the UST program are outlined below:

- The implementing agency must provide notice to the public directly affected by the release and planned corrective action for every release that requires a CAP. Appropriate forms of public notice include, but are not limited to: newspapers; block advertisements; state register publications; letters to households; and personal contacts.
- Release information and decisions regarding the CAP must be made available to the public upon request.
- A public meeting may be held to consider comments on the proposed CAP if there is sufficient public interest, or for any other reason.

- The implementing agency must provide public notice if the CAP implementation does not achieve established cleanup levels and termination of the plan is being considered.

Summary

Fifteen (15) States provided information specific to Tanks programs. Of the programs in this report, the Tanks programs have by far the most voluminous number of sites (53,138 tanks sites versus the next largest program, that being RCRA, at 8,766 sites). Tanks sites comprise 78% of all sites noted in response data and has one of the lowest percentages of total community involvement at 15%. Compared to the other programs, the Tanks program has on average the most sites per FTE at 184, where other programs range from two to 14 sites per FTE. The Tanks program also has the lowest number of community involvement staff at 3.8 compared to the other programs that range from 5.8 to 31.9.

Findings

- The Tanks programs reported the lowest percentage of sites undergoing community involvement activities (18%). This is likely due to the nature of the Tanks program, as community involvement activities are only required for LUST sites with a CAP. Many of the reported tanks in this report (53,138) may include UST sites that are not ongoing remediation or have never had a petroleum release.

Brownfields

State-run Brownfields programs are primarily designed to address relatively low risk sites that fall outside of other regulatory programs but still have potential environmental liabilities that impact the ability of current or future land owners to develop a site. As a result, Brownfields have a greater focus on the economic elements of environmental cleanups than other regulatory programs. To meet the economic needs of their participants, successful Brownfields programs should be flexible, able to work within a condensed schedule that provides a degree of certainty to its participants, relieve participants of environmental liability, and focus on projects that have the support of local communities.

States are presented with a number of requirements to receive Federal funding for State Brownfields and Voluntary Remediation programs. These requirements are laid out in the Small Business Liability Relief and Brownfields Revitalization Act (H.R. 2869), specifically Subtitle C Section 231. The act requires State programs to provide “mechanisms and resources to provide meaningful opportunities for public participation,” which generally manifests as the ability to provide comments on relevant documents. U.S. EPA also offers a number of grants similar to Superfund technical assistance grants (TAGs) to Brownfields communities. These grants are designed to promote community involvement and help communities share in the economic prosperity that comes from redevelopment.

Summary

Nineteen (19) States provided information specific to Brownfields programs. Respondents provided that there are currently 4,491 active sites run by 707 FTEs in their programs, averaging 6 sites per FTE. Of these sites, approximately 2,265 are undergoing some form of community involvement. Roughly 32 FTEs provide community involvement support for their programs, more than any other program covered under this report. However, with the high percentage of sites undergoing some sort of community involvement, community involvement professionals in Brownfields programs face the second highest number of sites per capita than any program besides RCRA (140.8).

Findings

- The nature of the Brownfields program requires more marketing, thus more community involvement.
- There is a higher turnover rate of sites in these programs with more sites undergoing community involvement at any one time.
- Community involvement efforts mainly fall on project managers but they have greater access to institutional knowledge than other programs.
- There appears to be more funding allocated directly to community involvement in Brownfields than other programs, but more data would be required to confirm this.

Federal Superfund - NPL

The CERCLA, or Superfund, was established in 1980 in response to the growing number of hazardous waste sites being identified. The three main goals of Superfund are to: address environmental and health risks posed by sites; allow U.S. EPA to clean up sites if a responsible party is unwilling or unable to; and provide an inclusive community involvement process starting at the listing of an NPL site up to and including the investigatory phases, key milestones, cleanup decisions, and site closure.

A site-specific community involvement plan (CIP) is required under CERCLA and is developed once key community leaders, citizens, and existing citizen advisory groups have been identified. Community interviews are conducted to identify community concerns, inform people of the Superfund process and how they may become involved, and identify a location for locally accessible information. Information is provided when TAG funding becomes available. Advisory team meetings can be held if the community requests the need for frequent updates. An Administrative Record is established to document key milestones and associated public involvement. Public meetings, comment periods, and responsiveness summaries provide forums to obtain and respond to public needs and commentary.

In essence, the CIP acts as the blueprint for the public of the Superfund process complete with specific community involvement activities identified for each phase of the entire process. The

U.S. EPA website has numerous publications devoted to informing the public of the technologies and processes used to clean up sites and ways to provide meaningful input.⁴

Summary

Seventeen (17) States provided information specific to Federal Superfund programs. Respondents indicate that 291 sites are actively proceeding through the community involvement process.⁵ Of the 291 sites, 77 have community involvement programs in place. Staffing numbers represent 104 FTEs that include project managers, engineers, scientists and community involvement coordinators. Of the 104 FTEs, 13.5 FTEs represent full-time community involvement coordinators. Five States noted they have dedicated U.S. EPA funding for community involvement activities and five States noted they received outside help from contractors.

Findings

- The level of resources is dependent on factors such as: who is the responsible party? Does the responsible party have the ability to pay for resources to hire contractors to support all program requirements including community involvement? Is U.S. EPA funding the cleanup or part of it?
- Community involvement activities are relegated to project managers and scientists along with their other primary, and sometimes competing, work tasks. In some instances a project manager may involve the public affairs office or other public relations staff for press releases or meeting advisories.

Federal Facilities

Federal facilities follow CERCLA, RCRA, and National Environmental Policy Act (NEPA) public participation requirements as defined in law and regulations promulgated by the U.S. EPA. Within the Department of Defense (DoD), each military service develops service-specific directives to implement public participation requirements.

Federal facility public participation programs were particularly influenced by the final results of a six-year national dialogue known as the Federal Facilities Environmental Restoration Dialogue Committee (FFERDC).⁶ Each federal agency participating in that dialogue incorporated public participation principles agreed to by consensus into agency policies. For example, the Department of Energy (DOE) established Site Specific Advisory Boards (SSABs) in accordance with the consensus agreements reached in the FFERDC final report. DoD established Restoration Advisory Boards (RABs) that meet the same goals. DoD and DOE public participation programs rely heavily on these advisory boards. The boards provide for State and U.S. EPA ad hoc participation.

⁴ <http://www.epa.gov/superfund/community/>

⁵ Nationwide, there are 1,372 proposed and final sites on the NPL, and 375 sites have been deleted from the NPL [<http://www.epa.gov/superfund/sites/npl>].

⁶ <http://www.epa.gov/fedfac/fferd.htm>

Summary:

Eleven (11) States provided information specific to federal facility programs. Respondents provided that there are currently 145 federal facility sites with 29 FTEs providing community involvement oversight (approximately five sites per FTE) in their States, with 0.5 FTE dedicated community involvement staff for oversight at federal facilities. The bulk of community involvement oversight falls to technical project managers. (NOTE: Because the definition of “site” is not consistent among States, U.S. EPA, DoD, DOE, and other federal facilities, this data needs to be further explored to determine the correct interpretation of “site” numbers.)

Findings

- Federal agencies are responsible for planning and implementing their own community involvement programs with States providing oversight where the State is the lead regulator.
- Though driven by CERCLA, which in general has more robust community involvement requirements than other programs, Federal Facilities reported the second lowest percentage of sites undergoing community involvement activities next to Tanks (18%). These low numbers mirror the findings of the 2007 survey report on federal facilities, but do show minor improvement. Reasons for these low numbers could include a lack of communication between Federal agency leads and their State partners regarding community involvement activities, a high number of inactive sites (e.g., Formerly Used Defense Sites), or a lack of focus on the community aspect of CERCLA cleanups by Federal agencies outside of U.S. EPA.
- Because most States do not dedicate FTEs specifically for community involvement efforts, oversight mainly falls to project managers with some assistance from public affairs offices, as the project manager requests.
- Federal Facilities have greater access to resources to conduct community involvement. Federal Agencies have dedicated funding for these tasks as well as greater access to outside contractors with community involvement experience.
- None of the States who responded received U.S. EPA funding for federal facilities. Thus, the reported FTE and community involvement activities are potentially lower than otherwise since States were asked to concentrate only on those sites that receive U.S. EPA funding.

V. Summary of Narrative Information Provided by States

Narrative information received by States reinforce that there is no consistent definition or implementation of “community involvement” among States, State programs, and federal programs. In addition:

- Many State programs (e.g., RCRA, Brownfields, Tanks) consider public notification as their sole community involvement effort, including posting information on websites; they do not indicate face-to-face engagement with stakeholders.

- Some States actively work with local officials on Brownfields redevelopment projects, and at least one stated they work with city committees, which include citizens involved in decision-making.
- Some States conduct required community involvement activities at specific milestones, but do not indicate regular engagement with communities throughout the project.
- A few States indicated that they engage stakeholders on a regular basis, developing and implementing community involvement plans.
- One State indicated that most community involvement is conducted through RABs (related to Superfund).

Approximately half of the respondents reported having dedicated community involvement staff:

- Technical staff are generally responsible for conducting community involvement activities (19 activities included in information request and many are being conducted (See Appendix A, Question 8)).
- Contact with public affairs, environmental justice (EJ) offices, risk assessors, administrative staff, as needed.

Within CERCLA programs (Brownfields, Superfund, Federal Facilities), approximately half of the respondents have access to outside community involvement support. For RCRA and Tanks programs, only two States reported having access to outside support.

- Where community involvement is included in project contracts, many times the amount dedicated to community activities is miniscule indicating a lack of resource requirements for effective community involvement. For example, States reported \$1,000 and \$3,000 contracts.
- Some States have a centralized unit that supports all program areas.

VI. General Trends Identified:

A lack of dedicated community involvement staff frequently obligates technical staff, often untrained in community involvement, to fulfill community involvement requirements. Even in programs with dedicated community involvement resources, the number of community involvement staff is often limited, resulting in large case loads. Consequently, community involvement activities are conducted inconsistently, frequently without a comprehensive CIP.

Specific trends:

- The definition of community involvement appears to vary significantly from program to program and State to State.
- Roughly half of the respondents have access to trained community involvement staff. However, these staff are limited in number and most community involvement

implementation falls to technical staff and program managers. Lack of training, resources, and time limit their ability to conduct flexible and effective community involvement.

- Limited access to and funding for outside support.
- Significant inconsistencies are evident among States in the types of community involvement activities that are implemented. This can be linked to a lack of training and understanding by technical staff and program managers as to what community involvement entails, and limited resources for planning and implementation of effective community involvement.
- In general, RCRA, Tanks, and Federal Facilities have a significant lack of resources for all tasks, as demonstrated by the high number of sites per FTE.
- Programs with more dedicated federal funding (Brownfields and Superfund) conduct more community involvement activities.
- Approximately 60% of respondents noted comprehensive community involvement planning across programs.

VII. Recommendations

Employing additional dedicated community involvement staff, together with the use of outside resources and partnering with State and federal counterparts, are strategies that can be leveraged to allow for more comprehensive and effective community involvement.

Focus Group recommendations:

- Standardize definitions of community involvement across programs.
- The marketing approach of the Brownfields Program may yield benefits to other programs' community involvement program development and implementation.
- Project managers are encouraged to plan and budget for community involvement activities, and identify and take advantage of outside resources when needed and available.
- Increase efforts to coordinate and partner community involvement efforts with multiple State and federal counterparts as this would assist with limited resources.

APPENDIX A: INFORMATION REQUEST

- 1) Please check all waste and remediation programs in your State/Territory that receive federal funding from the U.S. Environmental Protection Agency:
 - RCRA - Compliance Monitoring and Enforcement, Permitting, Corrective Action
 - Tanks - Prevention and Cleanup
 - Brownfield, Land Revitalization, Voluntary Cleanup
 - Federal Superfund - NPL
 - Federal Facilities - Oversight, Compliance (All Federal Agencies)
 - Other - [User Provided].
- 2) At approximately how many sites, within each program, is your State actively conducting oversight?
- 3) Of the number of sites provided above in Question 2, on average, approximately how many of these sites are conducting community involvement activities at any given time?
- 4) Approximately how many full-time employees (FTEs) - Project Managers, Engineers, Scientists, Community Involvement Coordinators, Administrative, etc. - are in these programs:
- 5) Do any of your programs have its own staff specifically devoted to conducting community involvement (e.g., Community Involvement Specialist)? Please list staff positions.
- 6) Do any of your programs have access to outside staff/support for conducting community involvement (e.g., contractors, other State agency)? Please list.
- 7) Do any of your programs have U.S. EPA funding dedicated specifically for conducting community involvement activities? Yes or No.
- 8)
 - a) What types of community involvement activities do your agency's programs currently conduct?
 - Preparing and reviewing advertisements
 - Writing or reviewing articles
 - Creating and editing fact sheets
 - Writing or editing public notices
 - Hosting or assisting with public availability sessions
 - Hosting or assisting with public hearings
 - Hosting or assisting with public meetings

- Creating public service announcements
- Assisting with citizen advisory groups
- Creating and maintaining a website
- Conducting trainings or workshops
- Mediating public outreach opportunities
- Coordinating with multiple state and federal counterparts to have one coordinated CI program
- Establish and maintain a Listserv for interested stakeholders to receive site-specific materials and updates
- Posting informational signs
- Establish and maintain an information center located in the affected community
- Direct communication via informational letter to property owners located in close proximity to the contaminated site.
- Developing and implementing site-specific Community Involvement Plans.

b) Who conducts these activities?

- Community Relations Specialist
- Project Manager
- Engineer
- Scientist
- Contractor
- Responsible Party
- Other.

9) Does your State conduct additional community involvement activities not listed above?
(Provide up to 3)

10) Please provide additional information that you feel would be helpful to the Community Involvement Focus Group in assessing community involvement resources in the States and Territories.