

EPA Region 10

FY09 Environmental Justice Action Plan

1. NARRATIVE ENVIRONMENTAL JUSTICE PROGRAM DESCRIPTION

Overview of Region 10 EJ Effort:

Management Accountability: The Environmental Justice effort is located in the Ecosystems and Community Health Unit (ECHU) and is managed by Judith Leckrone Lee. ECHU is based in the Office of Ecosystems, Tribal and Public Affairs which is Directed by Richard Parkin. Michelle Pirzadeh serves as DRA and is a member of the EJ Executive Steering Committee.

Internal Organizational Engagement: Region 10 has a staff level and Executive Team level organization in support of regional EJ integration. At the staff level we have the EJ Integration Team, which comprises staff level representatives of eight offices and two operations offices in Alaska and Idaho. The Integration Team does ground level EJ integration work in their respective offices and assists in the identification and resolution of EJ issues from communities. The Executive Team Environmental Justice Committee is comprised of five Office Directors who give overall guidance to the EJ Program.

External Stakeholder Engagement: Region 10's EJ effort conducts external outreach via e-mail listserves, listening sessions, stakeholder meetings, consultations with communities and agencies, participation in conferences and symposia, regular EJ trainings, state partnerships and through participation in interagency workgroups. The region held a stakeholder meeting with community and agency representatives from four states in October 2008. The regional EJ effort also maintains a webpage.

Data Collection Management: The Regional EJ program now has an EJ Issue Management Protocol to identify, address and track EJ issues coming to our attention from a variety of sources. We plan on reporting on issues received and tracked through the Protocol to the Executive Team EJ Committee periodically. We have also become more deliberate in keeping records of staff and management completion of EJ training.

Professional and Organizational Development: Region 10 has clear goals regarding staff and management participation in the Fundamentals of EJ workshop. All employees take the 1-day version. The more advanced days 2 and 3 will be widely offered in the winter, spring and summer of 2009. The first two days of training are required for Unit Managers. The Environmental Justice Program Manager is offered strong support to attend conferences, symposia and external trainings to keep him up to date and further develop his skills and utilize them in our EJ program development.

Environmental Justice Assessment Process: Region 10 is participating in the beta testing of EJSEATS. In addition the region has a desktop EJ assessment tool which has recently been upgraded resulting in significant improvements.

Region 10 Robust, Results Oriented Activity: Region-Wide Environmental Justice Training

Environmental Justice training supports **Goal 6 of the National Environmental Justice priorities, Cross Cutting Strategies** and the objective, **Collaborative Problem-solving to address environmental justice issues**. All Region 10 EJ trainings are open to EJ stakeholders, community members and tribes. The strategy behind this “open enrollment” approach is to develop the cross-sector networks and relational infrastructure that facilitates collaborative problem solving during and after the training day is over. The workshop employs case studies, methodologies, frameworks, conceptual tools, and historic perspectives to teach participants how to recognize, identify and address EJ issues.

To strengthen the collaborative problem solving component of the training, in 2009 the three day EJ curriculum will incorporate tools from the **EPA HQ Working Together: An Introduction to Collaborative Decision Making** curriculum and the **ADR Training for Environmental Justice Communities**, the latter of which will be delivered in Region 10 in the spring of 2009 by the Environmental Law Institute.

EJ Training Plan and Model

Region 10 is currently implementing a three-tier approach to EJ training in the Region.

At the first level, all staff and managers take the one-day version of the Fundamentals of EJ training. Our goal in having 100% participation is to establish a Region-wide knowledge baseline.

The second tier of the training effort is the specialized or program specific EJ training. Based on the recognized need for staff and managers to have the benefit of detailed EJ knowledge of particular programs and activities such as permitting and inspections, this level of training can be delivered as program consultations, formal seminars or workshops, or self-directed learning projects.

The third level of training is formal and informal evaluation of the first two levels with the intention of “continuous learning” from our experiences resulting in accurate assessments and communication of the level and quality of EJ integration throughout the Region. Activities at this level flow practical EJ knowledge back into the Region, making it accessible at all levels of work, and thereby achieving the goal of becoming a “learning organization”.

Training activities at each of these levels are expected to occur continuously and simultaneously. For example, as staff in units have experienced the Fundamentals, they would be engaged in more program or activity specific EJ training as schedules and resources allow.

The training model is based on several assumptions. First, that consistent baseline level of EJ information disseminated across the region is essential for integration of EJ into the programs. Second, that integration of EJ requires consistency and a systemic, “whole organization” approach. Third, that a baseline of knowledge needs to be created among all staff and managers given the dynamic field of EJ, i.e. an evolving field where new knowledge is continually added, where authorities are frequently blurred, and political interest, while currently high, tends to ebb and flow; and finally, that specialized, program specific knowledge is critical for integration success.

Background: The Fundamentals of EJ Workshop, Learning Objectives and Pedagogy

The Fundamentals of EJ workshop is an adaptable and modular designed course that can easily be adjusted to the audience and organized into one, two or three day versions. It is based on principles of community and adult education, which lend it a “learner-centered”, contextual and practical character. It is highly interactive, draws on the existing knowledge of the participants, values diversity and seeks to build a peer community for continual learning and problem solving.

The learning objectives of the one-day version are, to provide an overview of information fundamental to a comprehensive understanding of EJ; to provide a networking opportunity (community building); provide knowledge and skills to recognize and identify EJ issues; to provide resources for problem solving and learning after the workshop; and to provide the inspiration to become a champion of EJ in participant’s agencies and communities.

Though sometimes described as providing the “basics”, the workshop is more accurately characterized, especially the two and three day sessions, as providing the fundamentals, e.g. information and experiences, of a comprehensive understanding of EJ as a whole.

The two and three day versions of the workshop progressively add additional levels of detail, opportunities for hands-on learning through case studies and field trips, a context for deeper dialogue through expert panels and more program specific knowledge.

Robust, Results Oriented Activity: Region-Wide Environmental Justice Training

| Inputs | Outputs Activities/ Resources/ /Partners | Applicable Outcome Measure | | | Point of Contact |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | Short-term (awareness) | Intermediate (behaviors) | Long-term (conditions) | |
| National FTE EJ Executive Order HQ Memos on EJ Training EJ Training Curriculum Cadre of Trainers Regional RA Memos mandating EJ Training Strategic Endeavors and | EJ Training 1, 2 and 3 day versions of the Fundamentals of EJ workshop <i>Customers:</i> EPA employees, EJ Stakeholders and the interested public Mentoring and Modeling | Numbers of employees, EJ stakeholders, Tribes and interested public registering for and attending EJ trainings, 1, 2 and 3 day versions. Numbers of staff and | Greater recognition of EJ issues by staff and managers evidenced by numbers of EJ issues identified and reported to EJ Program Manager. Greater understanding of Regional EJ program and how to use it to address EJ issues | Full “integration” of EJ principles and processes in the Region (i.e. EJ considerations are proactively and routinely addressed in program activities), resulting in enhanced effectiveness in addressing community EJ issues as measured by number of issues identified and | Running-Grass, EJ Program Manager US EPA Region 10 1200 Sixth Avenue Ste. 900, MS: ETPA 086 Seattle, WA 98101 (206) 553-2899 (206) 553-6984 (fax) Grass.Running@epa.gov |

| Inputs | Outputs Activities/ Resources/ /Partners | Applicable Outcome Measure | | | Point of Contact |
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| | | Short-term (awareness) | Intermediate (behaviors) | Long-term (conditions) | |
| Smart Goals EJ Integration Team Executive Team EJ Committee EJ Issue Management Protocol | <p><i>Customers/Partners:</i> WA Department of Ecology (WA. DOE) Oregon Department of Environmental Quality (ODEQ)</p> <p>Informal “Outcalls” <i>Customers:</i> Colleges and Universities, Tribes, Non- Profits, Agencies, Public and private schools, community groups, advocacy organizations, industries and commercial organizations</p> <p>Program Consultations <i>Customers:</i> Regional Program Offices</p> | <p>managers registering for and attending EJ training in each organization.</p> <p>Successful completion of mentoring by agency EJ coordinators.</p> <p>Numbers of invitations to train at “external” organizations.</p> <p>Numbers of actual invitations accepted and trainings delivered.</p> <p>Numbers of invitations extended for program consultations, workgroup participation, issue management assistance and results of such efforts.</p> | <p>arising in work as evidenced by numbers of EJ issues reported to EJ Program manager.</p> <p>WA DOE and ODEQ continue EJ training in their respective organizations after mentoring is complete.</p> <p>Alaska and Idaho identify EJ contact person and request and receive EJ training mentoring and modeling.</p> <p>Numbers of follow-up requests for collaboration, partnership, research, etc.</p> <p>Numbers of students requesting and receiving internships.</p> <p>Greater facility and willingness among staff and managers in recognizing and addressing EJ issues in their work.</p> | <p>successfully resolved.</p> <p>Enhanced ability to work proactively, cross-media, and in collaborations internally and externally to address potential or actual EJ issues as evidenced by numbers of workgroups and other collaborations by program offices and verification of successful results, e.g. the following collaborations: addressing fish consumption in OR water quality standards, protecting subsistence fishing in the Colville delta, understanding and addressing the impacts of copper and gold mining in the headwaters of Bristol Bay, AK and the South Seattle Interagency EJ Workgroup.</p> <p>Effective, functional networks of local, state and federal agencies working collaboratively to address complex, multi- jurisdictional EJ issues from the policy level to the community level, e.g. All four Region 10 states conference monthly for</p> | |
| | <p><i>Customers:</i></p> | | | | |

| Inputs | Outputs Activities/ Resources/ /Partners | Applicable Outcome Measure | | | Point of Contact |
|--------|------------------------------------------------|----------------------------|-----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|
| | | Short-term (awareness) | Intermediate (behaviors) | Long-term (conditions) | |
| | <i>Customers:</i> | | | <p>information sharing, joint planning and coordination and evaluation of EJ related policies, processes and activities.</p> <p>Deep and rich multi-sector collaborations focused increasingly on proactive, problem-solving and avoidance of EJ issues, e.g. policy development on incorporating cumulative impacts analysis into permitting activities.</p> | |
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Region 10 Robust-Results Oriented Activity: Collision Repair/Auto Body Workshop Strategy

The Collision/Auto Body Repair Project supports the following national **EJ Priorities: Goal 1 Clean Air and Global Climate Change, objective 2, Reduce exposure to air toxics and Goal 5, Compliance and Environmental Stewardship, objective Ensuring Compliance.**

In FY2008, the Region 10 Collision Repair Campaign (CRC) team collaborated internally with the Pollution Prevention (P2) and the Compliance Assistance Programs, and externally with State, Local and Tribal governments as well as NGOs and industry associations to reduce hazardous air pollutants (HAPs), volatile organic compounds (VOCs) and Particulate Matter (PM) emissions from auto body shops through training, education and outreach. This campaign serves as an opportunity for shops to work towards early compliance with the new auto body rule (40 CFR Part 63 Subpart HHHHHH). To date we have built STAR (spray technique analysis and research) painting training capacity at **all** of the technical schools in Washington State, leveraged training equipment from Washington State Department of Ecology and coordinated workshops in Idaho, Oregon, and Alaska. In September, 2008 the R10 CRC hosted two Collision Repair *Crash Courses* at Lake Washington Technical College. These workshops were the first of its kind nationally to certify shops and their employees for compliance with the training requirements in the auto body rule by combining training from Design for the Environment (DfE) on best business practices with painting training to minimize emissions and a regulatory overview of the auto body rule. The successful September 2008 workshops alone have resulted in a **potential total savings of over \$144,000 for attendees who implement best practices** (based on workshop evaluations) and **potential emissions reductions of at least 11,100 lbs VOCs/year and 5,100 lbs PM/year in WA State**. The success of the R10 CRC team's collaborative leadership has resulted in **at least six planned future workshops** (January 2009 - June 2009) to be co-hosted by Oregon Dept. of Environmental Quality (ODEQ), WA State Dept. of Ecology (WA Ecy) and Idaho Department of Environmental Quality (IDEQ) with leveraged resources from the State agencies as well as EPA's Compliance Assistance Program, OAQPS and industry sponsors. With the help of a student volunteer we developed a GIS database of over 3000 auto body shops in Region 10, collocated with schools, childcare facilities, and environmental justice communities to help target shops posing the greatest risk to our most vulnerable populations. This tool will help State and Local air agencies prioritize inspections and target outreach. Through their network of over 30 public and private partners, the R10 CRC has leveraged resources and widely distributed outreach information throughout Region 10 and efforts will be expanded in FY 2009.

This campaign is important for both affected businesses and the environment. Through implementing best business practices, which include installing and maintaining control equipment and using safer paints and solvents, toxics exposures are expected to be reduced by 90%. Small business Auto Refinishing shops adopting best business practices can reduce toxic paint emissions by roughly 30%, or 2,200 pounds per shop, while saving as much as \$13,000 annually. It is estimated that utilizing best practices, which we emphasize in our outreach and workshops, in 1,000 shops will reduce HAP and VOC emissions by 3.5 million pounds annually.

Robust, Results Oriented Activity: COLLISION REPAIR/AUTOBODWORKSHOP STRATEGY

| Activities/ Resources/ /Partners | Output | Applicable Outcome Measure | | | Point of Contact |
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| | | Short-term (awareness) | Intermediate (behavior) | Long-term (condition) | |
| <p>Autobody Rule (40 CFR Part 63 Subpart HHHHHH)</p> <p>Response to inquiries on voluntary effort and regulation</p> <p>State and Local Government Agency partners</p> <p>Industry, NGO and trade association partners</p> | <p>Site Visits - outreach -- > Q&A with shops (through leveraged resources)</p> <p>2 Workshops completed. 6 additional workshops planned Jan. – July 2009 (co-hosted by state agency partners)</p> <p><i>Customers: General Public (Community / neighbors). Shops</i></p> | <p># People attending workshop - painters trained. Shop evaluations. Evaluations with train-the-trainers who go into the shops.</p> | <p>Regulated and non-regulated entities and people change their behavior, comply with requirements and reduce, prevent or mitigate emissions to the air.</p> <p>Emissions and cost savings estimates based on best practices shops adopt from workshop – through workshop evaluations and follow-up with shops and trainers</p> | <p>Air quality standards are protected. Impacts on human health and environment are reduced. Clean air & improved human health on Indian Reservations. Air quality on reservations is protected better protected and improved.</p> | <p>Ashley Zanolli Environmental Engineer US EPA Region 10 1200 Sixth Avenue Ste. 900, MS: AWT-107 Seattle, WA 98101 (206) 553-4425 (206) 553-0110 (fax) Zanolli.Ashley@epa.gov</p> |
| <p>CRC and website</p> <p>Providing information to local agencies</p> | <p>Report of end of year sales with distributors and correlate to locations within a zipcode</p> <p><i>Customers: Shops</i></p> | <p>Identify location of all Autobody shops</p> | <p>Compliance with Autobody rules and best practices decreases air pollution in R10 including on Indian Reservations</p> | | |
| <p>Design For the Environment (DFE) program and website</p> <p>Program evaluation/case study</p> <p>Auto Body GIS Database</p> | <p>Report evaluating effectiveness of program</p> <p><i>Customers: Agencies (state, locals, fed)</i></p> | <p>Get 4 interns from University of Washington.</p> | <p>Shops posing the greatest risk are prioritized by state and local agencies for inspections and compliance assistance.</p> | | |

2. PROGRAM ENVIRONMENTAL JUSTICE REVIEW ACTIVITY

Region 10 EJ Review Activity: Region 10 Activities on Communities Adjacent to the Duwamish River Superfund Sites

Summary of Review Activity

Region 10 plans to conduct a review of the impacts of regional decisions and activities on two communities in Seattle, WA near the Duwamish River Superfund site. The communities are South Park and Georgetown and together are frequently referred to as South Seattle. Demographic characteristics—low to moderate income and ethnically and racially diverse—portray these areas as EJ communities. Environmental and public health impacts are widespread and documented in these communities co-located near a variety of industrial facilities including the Port of Seattle, Sea-Tac Airport, cement plants and an interstate highway.

Background on the Superfund Site

The Lower Duwamish Waterway site is a 5.5 mile portion of the Lower Duwamish River which flows into Elliott Bay, Puget Sound. The waterway lies just south of downtown Seattle and is flanked by industrial corridors, as well as the South Park and Georgetown neighborhoods.

Sediments (mud and sand on the river bottom) in and along the waterway contain a wide range of contaminants from years of industrial activity and from stormwater. The Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) are working to clean up contaminated sediment and control sources of recontamination in the waterway.

EPA added about five miles of the waterway to its list of Superfund cleanup sites in 2001. The contaminants in the waterway sediments include polychlorinated biphenyls (PCBs), polyaromatic hydrocarbons (PAHs), mercury and other metals, and phthalates.

EPA, the Washington State Department of Ecology, and other partners are investigating and cleaning up sediment contamination under Superfund and other programs. The investigation will include an assessment of potential risk to the health of people, fish, wildlife, and the environment.

Additional Details on Scope of Review

Our planned review will focus primarily on Superfund impacts but will extend to the impacts of other programs directly active or indirectly through their interactions with or oversight of regional and state agencies which share jurisdiction for permitting, inspections and other enforcement activities with environmental or public health impacts. In particular we are interested in evaluating the effectiveness of our coordination and oversight with Puget Sound Clean Air Agency and the Washington Department of Ecology in reducing impacts to the community.

This review aligns with work we have undertaken with the South Seattle Interagency EJ workgroup. The workgroup was formed two years ago at the request of community groups and residents for greater agency transparency, accountability and opportunities to participate in agency decision making in their area. The purpose of the workgroup is to enhance the environmental and public health of South Seattle through effective communication, coordination and collaboration between agencies and communities. Its shared goal is to reduce residents and worker exposure to environmental toxics in South Seattle.

Draft Timeline for Review:

We anticipate conducting and completing the Review in FY09.

November-December, 2008: Scoping the Review Parameters

January-June, 2009: Conduct the Review

July-September, 2009: Write, Finalize and Submit the Review