UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OSWER Directive #9230.0-15

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Role of Community Interviews in the Development of a Community Relations Program for Remedial Response

FROM: Henry L. Longest II, Director,
Office of Emergency and Remedial Response

TO: Director, Waste Management Division
Regions I, IV, V, VII, VIII
Director, Emergency and Remedial Response Division
Region II
Director, Hazardous Waste Management Division
Regions III, VI, IX
Director, Hazardous Waste Division
Region X

PURPOSE:

To offer guidance in response to recent Regional Office questions regarding the community relations interviews required by the National Contingency Plan.

BACKGROUND:

Without a doubt, the interviews are the single most important element in the development of a site-specific community relations plan (CRP). The CRP, in turn, serves as the backbone of the entire community relations program during a remedial response. I hope you find the following information useful in clarifying the role of this crucial activity.

POLICY:

1) The CRP should be based upon interviews conducted with the community. The National Contingency Plan (NCP) requires interviews and the development of a CRP based upon them. Among the community relations activities required by Section 300.430(c)(2)(i)of the NCP is "...preparing a formal community relations plan (CRP), based on the community interviews and other relevant information..."

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2) Interviews should be conducted among a variety of people. Staff ordinarily speak first with State and local officials to obtain background information and to let these people know that area residents will also be interviewed. The group of interviewees should not, however, be limited to these officials. "These discussions with elected officials cannot in themselves generate enough information to develop an adequate community relations plan. Special efforts must be made to interview local residents, particularly those who are not affiliated with any group." (Community Relations in Superfund -- A Handbook, OSWER Directive #9230.0-3B, p.3-4). Staff should interview a broad range of people so as to gain the greatest variety of perspectives about the site, including potentially responsible parties. Furthermore, the staff should "...never limit conversations to the most visible groups or individuals." (Community Relations Handbook, p.3-4)

3) Interviews should be conducted with at least 15 - 25 residents. It is imperative that staff interview a group that represents a cross-section of the community. This number is typically at least fifteen to twenty-five persons, depending on the size and complexity of the site, but it can be more. At one particularly complex site, for example, Regional staff conducted over two hundred interviews.

4) Contractors should never conduct interviews without the presence of EPA staff. EPA dependence on contractors has been a particularly controversial issue and community relations was named in a recent memorandum from Administrator Reilly as an area potentially vulnerable to contractor misuse (See attached memorandum). Interviews are most often conducted by some combination of the Remedial Project Manager, community relations staff, enforcement staff and contractors. Remedial Project Managers are especially encouraged to conduct community interviews as a way of learning about a community and its issues, as well as meeting community leaders early and fostering positive relationships.

For more information regarding community interviews, refer to Chapter 3 of Community Relations in Superfund -- A Handbook, and Section 300.430(c)(2)(i) and accompanying preamble of the NCP. If you have additional questions, please contact Melissa Shapiro of my staff at FTS 382-2350 or Jeff Langholz at FTS 382-2460.

Attachment

cc: Public Affairs Directors
Regional Community Relations Coordinators