

INFORMATION REPOSITORY

An information repository is a collection of all documents pertaining to the site, including correspondence and reports as well as general RCRA information. Repositories are located at a storage area near the site or more often electronically on the internet. An electronic information repository may be a user-friendly, cost effective way to provide electronic publicly available information to the disabled and residents in remote areas. At a physical or electronic information repository, people can research the site and the law pertaining to permitting activity, learn how to participate in the permitting process, and copy any information found at the repository.

EPA's public participation guidelines for RCRA information repositories are detailed in Chapter 4 of the <u>2016 Edition of</u> <u>the RCRA Public Participation Manual</u>.

Required Activity?

No, unless directed by the permitting agency.

Making it Work

When to Use

The information repository should be established for those RCRA facilities going through the permitting process and corrective action process. Specifically, consider whether to establish an information repository when the draft permit is issued or when the facility begins the facility investigation phase of corrective action.

How to Use

The two most significant issues are determining the location and choosing the materials for the information repository. A specific location can be determined during *Community Interviews*. The repository should be easily accessible by the public. Some common locations are public libraries, city halls, and public health offices where public access is convenient and photocopying equipment is available. Alternative locations include fire stations, recreational centers, public housing offices, or religious buildings. The repository could also be located at the offices of the permitted facility, if members of the community feel comfortable on the facility's property. An electronic repository can be set up instead of a physical one or in addition to it. It should be accessible on a website available to the public. The physical repository should be accessible during normal business hours. The facility must meet the requirements of the Americans with Disabilities Act (ADA). Visit the Center for Independence (CFI) Internet site: www.centerforindependence.org/. The site includes weekly updates and information about making your public space accessible. For a free copy of the ADA Guide for Small Businesses, call CFI at (970) 241-0315.

The facility and/or regulatory agency makes arrangements for the location of the information repository by contacting the likely facility and negotiating with the facility's point of contact. Repository contents should be organized, indexed, and situated in a spacious area. Planning of the arrangement of the documents in advance is advised. Multiple copies should be made to compensate for misplaced documents. Repository contents should be updated regularly with recent information.

The repository should be maintained by a custodian. Pertinent materials are typically mailed to the repository location with instructions on indexing and placement. Documents relating to the Administrative Record are sent to the



information repository by a Regional Records Department. The repository custodian should create and revise an index when each new document is added to the repository. The permit applicant and/or permitting agency should notify the custodian of the repository of these responsibilities when soliciting the facility's cooperation.

The facility and/or regulatory agency is responsible for visiting the repository regularly to ensure that all necessary materials are easily accessible and that documents in the repository clearly indicate how individuals can comment on them. One method is to place a cover note on documents indicating who is to receive comments and by when.

Moreover, the permit applicant and/or permitting agency must publicize the physical and electronic repository's location and hours of operation by notifying local government officials, citizen groups, and the *Media*. The permit applicant and/ or permitting agency may also inform the public by printing articles in community and church newsletters.

The repository should be indexed in a simple and convenient manner. The following is a sample information repository index:

- Background information on the company or facility;
- Fact sheets on the permitting or corrective action process;
- Summary from the pre-application meeting (if one was conducted);
- Public Participation Plan (if developed);
- The draft permit;
- Reports prepared as part of the facility investigations;
- Fact sheets prepared on the draft permit or corrective action plan;
- Statement of Basis;
- Response to comments;
- Copies of relevant guidance and regulations;
- A copy of the cooperative agreement, if the state is the lead agency for the project;
- Documentation of site sampling results;
- Brochures, fact sheets, and other information about the specific facility (including past enforcement history);
- Copies of news releases and clippings referring to the site;
- Webinar material, PowerPoint slides, and videos about the RCRA permitting or corrective action program and the specific site;
- Names and phone numbers of a contact person at the facility and at the permitting agency who would be available to answer questions people may have on the materials in the repository; and
- Any other relevant material (e.g., published studies on the potential risks associated with specific chemicals that have been found stored at the facility; webinar material such as powerpoint presentations; and videos).

Ensure materials are in the repository before the public is advised to access them. It is advised that a three-ring spiral notebook is used versus loose sheets of paper to physically house documents.