RCRA Public Participation Manual – Tools



EPA-530-F-20-001 | https://www.epa.gov/rcra

PUBLIC PARTICIPATION PLANS

The Public Participation Plan outlines a community-specific strategy for responding to the concerns identified in the Community Interview process. It will help the RCRA facility and/or regulatory agencies advise the site team on appropriate activities.

Required Activity?

No.

Making it Work

When to Use

The public involvement plan (plan) is a facility-specific set of actions that enables the regulatory agency to work effectively with the affected community and the RCRA facility. The purpose of the plan is to identify the public concerns and then utilize the existing regulatory requirements as a framework for meaningful public input in permitting decisions. This is not necessarily limited to the permitting process, but may also apply to significant corrective actions under RCRA § 3008(h)orders.

EPA's public participation guidelines for the RCRA public participation plans are detailed in Chapters 2, 3 and 4 of the 2016 Edition of the RCRA Public Participation Manual.

How to Use

Begin plan preparation with good information. Your most important resource will be the *Community Interviews*. Also consult EPA's <u>EJSCREEN</u> tool for an excellent picture of the demographics involved, including the potential need for document *Translation Services*. Do some research to find any past news articles, editorials, or letters to the editor that give insight into local perceptions.

The cover page should identify the plan as either the RCRA facility or regulatory agency's document. The plan should specify what the RCRA facility and/or regulatory agency do, not what they should do. Although the plan is site-specific, it should not be about the site itself. Rather, the plan should be about how you will involve the community in site activities. It should also be issue-specific in that it should identify the community's issues, needs, and concerns. (In cases where one site affects more than one community, the plan must identify each community and address its issues independently.)

After identifying community concerns, the plan should identify specific activities, outreach products, or programs that you will use to address the concerns. For example, if groundwater contamination is an issue, identify it as such, and state that "a series of workshops with a hydrogeologist will be conducted to explain groundwater." If the health effects of the substances are an issue, explain that fact and propose an activity featuring a toxicologist to talk about the site-specific contaminants, their known effects on people, and how they move through groundwater. Establish a timeline for activities throughout the pipeline (e.g., when the site team gets sampling results, we will hold a series of groundwater workshops.), or referenced by seasons (e.g., the spring of 2012, we will hold a).



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You are the primary, but not the only target audience for the plan; it is your plan to implement. Other audiences include future RCRA facilities and/ or regulatory agencies. Moreover, as you write it, remember that the plan will be placed in the *Information Repository* for a community-wide audience.

In general, the content of the plan should include:

- · Overview of the plan.
- Site description.
- · Community background.
- Community issues and concerns (from community interviews, see below).
- · Highlights of the plan.
- Community involvement activities and timing (including your Communication Strategy).
- Copy of the interview questions.
- Contact list (not the private citizens interviewed or the site mailing list).
- Location for Public Meetings.
- Location for the Information Repository.
- · Local media contacts.

Tips

- Write the public participation plan in a way that tells the public about the public involvement and invites them to participate.
- Specify that the plan comes from the permit applicant or permitting agency.
- Be site-specific.
- Be issue-specific.
 - Identify the community's issues and concerns.
 - Identify the activities and products you will use.
 - Relate the products and activities to specific issues.
- Use quotes from the interviews, but do not attribute unless they are from official sources.
- Establish a timeline for community involvement activities.
 - Link it to technical milestones or reference it to seasons or annual quarters.
 - Avoid stating specific dates as deadlines.
- Make it a five-year plan.
- Revise the plan every three years or as needed.
- Use the plan and treat it as a living, working document to guide you through the process.