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Community Engagement Assessment Worksheet for RCRA Permit Activities

Effective, timely, and meaningful community engagement yields significant benefits, especially in communities near hazardous waste sites. The purpose of this worksheet is to help gather information on issues that may trigger community concerns or sensitivities – and help state and EPA staff determine whether enhanced outreach or an environmental justice analysis may be needed.

The following worksheet is a preliminary tool that recommends elements for consideration (both standard and critical) when planning for effective community engagement. It is designed to be used during one-on-one meetings between community engagement staff and EPA RCRA Technical Project Managers ("TPM", including permit-writers, corrective action specialists, enforcement specialists, etc.). This tool can be used at various stages or milestones of the RCRA permit process, when community engagement is either required or may be considered (e.g., new permits, class two or class three permit modifications, permit renewals with significant changes, corrective action activities such as interim measures, consent decrees or orders, corrective action remedy selection and construction, and permit components including facility investigations).

RCRA Regulated Facility: _____ City/State: _____

EPA Authority: _____ Facility Activity (e.g., CA 550, etc.): _____

Technical Project Manager: _____ Community Engagement Staff: _____

Checklist for RCRA Public Participation

	Standard Elements of Effective Community Engagement	Y	N	Comments
1	**Conduct a discussion on the big picture.** Use notes from Google Earth Aerial Analysis and EJSCREEN analysis. Discuss aspects such as: relative residential proximity to the facility fence-line; population demographics; cumulative environmental impacts (e.g., other facilities nearby); size of facility acreage; and buffer areas. Have the Technical Project Manager share maps of the facility's RCRA-regulated units/cleanup areas and gain a general understanding. Be sure to become more familiar with those units that are in close proximity to the facility's fence-line. Discuss the EPA and the state environmental agency's RCRA regulatory roles at the facility. Discuss the facility's permitting and enforcement history. Discuss any technical challenges that may impact timing of any potential community engagement activities.			

	Standard Elements of Effective Community Engagement	Y	N	Comments
2	**Review historic public comment records, meeting summaries, and transcripts** for indications of potential community or environmental justice concerns (e.g., pre-application meeting summary, public comments on class two or class three permit mod request, public comments on draft permit, newspaper archives, hearing transcripts).			
3	**Discuss current and/or past public input/concerns** from previous facility-based work.			
4	**Consider the nature of the facility's relationship with community.** Some facilities have a very positive relationship with communities by actively improving health, safety, and environmental performance and communicating openly with neighbors about the facility's performance. Conversely, some facilities struggle establishing a trusting relationship with their community.			
5	**Identify whether a community group has been organized or established** as a result of real/perceived environmental, health or financial impacts from the RCRA facility.			
6	**Identify whether other external stakeholders have expressed concerns** about real/perceived environmental, health or financial impacts from the RCRA facility (e.g., state or Congressional representative; news media). Take note if any community revitalization efforts are taking place nearby.			
7	**Consider information on heightened sensitivity due to real/perceived threats to the community outside-of-the-fence-line** due to any of the following considerations (determined through review of available facility documents and other supporting information):			
7a	**Air.** Evidence of migration of facility-related air contaminants (e.g., RCRA-regulated constituents, such as particulates, volatile organic compounds) through observations, a fence-line monitoring program, or other air monitors within the vicinity of the RCRA facility.			
7b	**Air.** Evidence of migration of site-related contaminants (e.g., present or historic) through air deposition into soil onto nearby residential/industrial/ commercial facility properties.			
7c	**Storm-water Run-off/Surface Water.** Evidence of migration of site-related contaminants into nearby drainage pathways or surface water bodies (e.g., streams, lakes, neighborhood ditches).			

	Standard Elements of Effective Community Engagement	Y	N	Comments
7d	**Groundwater ("GW").** Evidence of GW contamination near or outside of the facility's fence-line. Consider assessments of the facility's point of compliance GW wells near the facility's boundaries (called sentinel wells), as well as off-site GW wells.			
7e	**Groundwater ("GW").** Evidence of contaminated GW that may pose actual or perceived threats to private/municipal drinking water wells.			
7f	**Groundwater ("GW").** Evidence of contaminated GW discharge, or potential discharge into a surface water body or low topographic area. If so, discuss if discharge area is used by public (e.g., stream or ditches on private properties versus an on-site pond) and what controls are in place.			
7g	**Groundwater ("GW").** Evidence of GW contamination type at levels that could or have caused vapor intrusion ("VI") outside the fence-line such as into residential homes, or within the fence-line into an active facility building where workers are present.			
8	**Consider other issues that may trigger community sensitivities** and may justify enhanced community engagement.			
8a	**Unique potential exposure pathways of facility-related contamination** (e.g., subsistence fishing, hunting and consuming wild game, harvesting wild plants for subsistence, community gardening).			
8b	**Probable cultural, tribal, historic, or archeological sites** listed or eligible for listing in the National Register of Historic Places that are nearby (e.g., churches, recreation and parks, sacred sites, historic structures, landmarks).			
8c	Other issues			
Suggested Recommendations for Future Community Engagement Direction:				

	Critical Elements of Enhanced Community Engagement	Y	N	Comments
1	**Discuss the facility's capacity to help coordinate community engagement** (e.g., presence of local community advisory panel, experience level in community engagement & outreach, willingness to fund public notices, willingness to participate in public/private/ philanthropic partnership.)			
2	**Review EPA's ECHO database** to view whether the RCRA facility has existing (media) permits [such as Clean Air Act (CAA), National Pollutant Discharge Elimination System (NPDES), etc.] that in the last two years have: 1. renewed and assess level of public comments/feedback submitted; 2. received any Notice of Violations (NOVs) by the state/ local agency or EPA; 3. been placed under any enforcement order. Also review if nearby facilities have had community concerns.			
3	**Review institutional knowledge present within EPA internal tracking mechanisms:** • EJ Complaint database, Enforcement Hotline, Controlled Correspondence and Congressional Inquiry • Reportable Chemical Releases or incidents (EPCRA; refer to the ERNS database maintained by Superfund) It is noted that chemical accidents, spills or releases (although not related to the RCRA activity) may erode levels of community trust in the facility and the regulated agencies. Therefore, it is advisable to be prepared when planning outreach, such as public meetings.			
4	**Consider other factors from the EPA HQ "EJ and Permitting" Analysis that may be useful.**			