Community Involvement Plan
Lockwood Solvent
Groundwater Plume Site

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United States Environmental Protection Agency

Region 8

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List of Acronyms

ATSDR	Agency for Toxic Substances and Disease Registry
Beall	Beall Trailers Inc.
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CIP	Community Involvement Plan
EPA	U.S. Environmental Protection Agency
LSGPS	Lockwood Solvent Groundwater Plume Site
MDEQ	Montana Department of Environmental Quality
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
PCE	Tetrachloroethene
RPM	Remedial Project Manager
SARA	Superfund Amendments and Reauthorization Act
TCE	Trichloroethene

1.0 Purpose

This Community Involvement Plan (CIP) for the Lockwood Solvent Groundwater Plume Site (LSGPS), Yellowstone County, Montana, has been prepared in accordance with the Superfund Community Involvement Handbook (Handbook) (Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency [EPA], April 2005) and the Community Engagement Initiative endorsed by the Office of Solid Waste and Emergency Response. The Handbook provides the community involvement requirements found in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), the regulation that governs Superfund. Implementation of the CIP will follow the EPA's Community Engagement Initiative, which is designed to assist interested community members in more effectively participating in the EPA decision-making processes.

The CIP guides the EPA's communications and interactions with the community as part of the Superfund process. The NCP requires a CIP for all removal actions lasting longer than 120 days and for all sites listed on the National Priorities List (NPL). The CIP is a basis for identifying community concerns and effective two-way communication to answer public questions and address public concerns. Community Involvement personnel strive to anticipate, identify, and acknowledge areas of conflict so that decisions can be made with full understanding of community views.

The EPA conducts community interviews, and, based on these interviews, prepares a CIP that includes a description of the site background, history of community involvement at the site (including all major community concerns), community relations objectives, and a list of affected and interested groups and individuals. The community interviews form the foundation for establishing a plan for keeping the community engaged throughout the Superfund process.

This CIP often presents the opinions and views of residents and other interviewees. The information obtained in these interviews and summarized in the CIP reflects interviewees' responses regardless of whether those responses are factually precise. The interview questions and responses for the LSGPS are discussed in Section 3.4.

1.1 Law, Programs, Government Agencies, and Local Groups

Superfund Law and Cleanup Program

Superfund is the nation's program to cleanup uncontrolled or abandoned hazardous waste sites. The Federal regulation that guides the Superfund program is the NCP, which was revised in 1990. The Superfund law, officially known as the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), was passed by Congress in 1980 and amended in 1986 by the Superfund Amendments and Reauthorization Act (SARA).

Superfund:

- Gives the EPA the authority to stop releases or potential releases of hazardous substances
- Enables the EPA to compel those responsible for site contamination to pay for cleanup
- Provides funding for cleanup when money from responsible parties is not available.

CERCLA requires the EPA, or the state at state-lead sites, to develop and manage community involvement programs at both fund-lead and enforcement-lead sites. At fund-lead sites, cleanup is paid for with Superfund money; at enforcement-lead sites, potentially responsible parties pay for cleanup. At either type of site, community involvement remains the responsibility of the EPA. The Superfund community involvement effort promotes two-way communication between members of the public and the lead government agency responsible for investigation and cleanup actions. The overall objectives of Superfund community involvement are as follows:

- Provide the public the opportunity to have input on technical decisions
- Inform the public of planned and ongoing actions
- Identify and resolve conflicts.

The EPA's community involvement activities also address environmental justice issues. Specific environmental justice goals are:

- Raising awareness of equity issues to the Superfund cleanup team
- Reviewing past site procedures to determine whether changes need to be made in areas that would impact minorities

- Tailoring of communications that are sensitive to the language and cultural differences of the community to ensure that all citizens have equal opportunity to become involved in the EPA's decision making process.

Under the Superfund program, the EPA investigates hazardous waste sites and is authorized to conduct two types of response actions:

- Removal Actions – are short-term actions designed to stabilize or cleanup incidents involving hazardous substances that present an imminent threat to human health or the environment. Time-critical removal actions can last no longer than 12 months or cost no more than $2 million. Non-time critical actions may be authorized and generally cost more and take longer to complete.
- Remedial Actions – are long-term cleanup actions that significantly and permanently reduce dangers due to releases or potential releases of hazardous substances that are serious but not immediately.

In 2002, the EPA performed removal actions at the LSGPS, including the extension of the public water supply to impacted residents. Future actions at the LSGPS will be remedial actions. Remedial actions are funded either through the Superfund account or directly from the parties responsible for the contamination. Both funding sources will be used at the LSGPS. Remedial actions continue the cleanup process with thorough investigations and extensive cleanup.

Relevant EPA Groups

The EPA administers and enforces the nation's environmental laws. Based in Washington, D.C., it includes 10 regional offices, each of which includes community relations and technical staff involved in Superfund site cleanups. The EPA Region 8 encompasses Colorado, Utah, Wyoming, North Dakota, South Dakota, and Montana. The EPA Region 8 office, located in Denver, Colorado, includes several offices, branches, and sections related to the Superfund Program. In addition, there is an EPA Region 8 office located in Helena, Montana. See Appendix A for the names, addresses, and telephone numbers of the EPA staff and managers for the LSGPS investigation and cleanup.

Superfund Community Involvement Section - Region 8

This section, part of the EPA's Office of Communication and Public Involvement, oversees communication between the EPA and all residents, public officials, media representatives, and community groups associated with Superfund sites. The Superfund Community Involvement Program for each site involves the planning, coordination, and implementation of activities designed to facilitate communication and enhance community involvement. Each site has at least one Community Involvement Coordinator who works closely with the EPA technical staff to keep the local community informed and involved.

Office of Ecosystem Protection and Remediation - Region 8

The Office of Ecosystem Protection and Remediation oversees the development and implementation of Superfund remedial and removal program activities, as well as Resource Conservation and Recovery Act activities.

Preparedness, Assessment and Emergency Response Program - Region 8

The Superfund Preparedness, Assessment and Emergency Response Program manages short-term actions and emergency responses. These actions include responses to accidental releases of hazardous substances, as well as short-term work at sites on the EPA's NPL. Removal actions are supervised by the EPA On-Scene Coordinators.

Superfund Remedial Response Program - Region 8

The Superfund Remedial Response Program is responsible for long-term technical work at Superfund sites, including site assessments, remedial investigations and feasibility studies, treatability tests, and remedial design and action (cleanup). Each NPL site has a Remedial Project Manager (RPM) who supervises private contractors and other parties involved in site study and cleanup. The LSPGS is managed by the EPA office in Helena, MT.

Program Support Group

The program support group is an advisory group of scientists available to senior EPA managers, On-Scene Coordinators, and RPMs for consultation on technical and scientific matters pertaining to Toxicology, Ecology, Human or Veterinary

Medicine, Chemistry, Hydrogeology, and/or Air Modeling. Scientists and/or physicians within the group are sometimes consulted to develop or review environmental sampling and analysis plans, or to develop or interpret environmental, epidemiological, medical or toxicological data. The Program Support Group provides 24 hours per day/7 days per week emergency response capacity to assist with science support and coordination during environmental emergencies. Most individuals within the Program Support Group actively pursue environmental research, education, and/or clinical practice at the Regional or national levels and maintains professional standings in their scientific disciplines; many Program Support members are board-certified in their respective fields of expertise.

Environmental Response Team

The Environmental Response Team located in Edison, NJ is a branch of the Emergency Response Division of the EPA's Office of Emergency and Remedial Response located in Washington, D.C. The Team includes hazardous waste experts who provide 24-hour technical assistance to the EPA regional offices. Staff members are involved in the testing of remedial technologies throughout the country, and can provide assistance during Superfund site cleanups.

Other Relevant Government Groups

Agency for Toxic Substances and Disease Registry

The Agency for Toxic Substances and Disease Registry (ATSDR), headquartered in Atlanta, Georgia, is part of the Public Health Service within the U.S. Department of Health and Human Services. ATSDR conducts Public Health Assessments at Superfund sites to evaluate data and information on the release of hazardous substances into the environment.

ATSDR developed a Public Health Assessment for the LSGPS in 2003. The Assessment supported the EPA’s conclusion to pursue cleanup at the LSGPS in order to protect human health and the environment. See Appendix A for the names, addresses, and telephone numbers of the ATSDR staff involved with the LSGPS Site.

Montana Department of Environmental Quality

The Montana Department of Environmental Quality (MDEQ), as part of its own Montana Superfund Program, acts as the support agency during the EPA-lead investigations and cleanups at federal Superfund sites in Montana. The Remediation Division responsibilities also include investigation and cleanup activities at state-lead federal Superfund sites, state hazardous waste sites under its Comprehensive Environmental Cleanup and Responsibility Act authority, and reclamation of abandoned mine lands. Other regulatory activities include permitting and licensing underground storage tanks; implementing corrective actions at sites with leaking underground storage tanks; administering the Petroleum Tank Release Cleanup Fund (reimbursing owners for the costs of petroleum release cleanup); and overseeing groundwater remediation at sites where agricultural and industrial chemical spills have caused groundwater contamination. These activities help to protect human health and the environment, prevent exposure to hazardous substances that have been released to soil, sediment, surface water, or groundwater, and ensure compliance with applicable state and federal regulations.

MDEQ's involvement in the LSGPS includes reviewing and commenting on work plans and studies, participating in community involvement activities, and providing technical assistance to the EPA. See Appendix A for the names, addresses, and telephone numbers of the MDEQ staff involved with the LSGPS.

Montana Department of Public Health and Human Services

The Montana Department of Public Health and Human Services is charged with improving and protecting the health, well-being, and self-reliance of all Montanans. The Office of Epidemiology and Scientific Support is charged with providing epidemiologic consultation and technical assistance to county and local health agencies and to federal agency partners. The State Medical Officer and the Senior Public Health Epidemiologist are available to provide technical consultation and review. See Appendix A for the names, addresses, and telephone numbers of the staff who may be contacted with reference to the LSPGS.

RiverStone Health / Environmental Health Services

The Environmental Health Services division of RiverStone Health focuses on providing a healthy environment for the residents of the local community through education, monitoring, and enforcement of State and Federal health laws and regulations in several programs, including inspections of licensed establishments such as food services, swimming pools, public accommodations, trailer courts, tattoo and body-piercing facilities, and daycares. RiverStone Health administers septic system permitting, subdivision review, and air quality monitoring. RiverStone Health will assist with education and post-cleanup activities at the LSGPS.

Local Community Resources

Billings Clinic, Billings, Montana

The Billings Clinic is a non-profit health care organization with 272 beds, and serves patients throughout Montana, Wyoming, and the Western Dakotas. The Billings Clinic has Level II Emergency and Trauma Center. The Billings Clinic is located at 2800 10th Ave North, Billings, MT 59107.

Boys and Girls Club of Yellowstone County

The Boys and Girls Club has provided a positive and safe environment for children in the Billings and surrounding area communities since 1971. The Boys and Girls club strives to help children become productive, caring, and responsible citizens. See Appendix D for contact information.

Billings Chamber of Commerce Conventions and Visitors Bureau

The Billings Chamber Conventions and Visitors Bureau seeks to achieve excellence in community leadership and growth, while developing a strong business climate and vibrant economy. They are a non-profit, membership-driven organization consisting of Billings' business community members. They provide leadership and networking options for the Billings region. See Appendix D for contact information.

Housing Authority of Billings

The Housing Authority of Billings is a public non-profit organization that works to provide safe, decent and affordable housing in the Billings area. They own over 400 housing units currently, and have rental subsidy over another 1,000 units. The housing authority was created in 1973 and has worked since then to provide housing options for low-income families and individuals. See Appendix D for contact information.

See Appendix D for a complete listing of community resources.

1.2 Document Organization

The EPA has prepared this CIP for the LSGPS based upon information from interviews with a range of Lockwood and Billings community members and leaders, as well as from other relevant sources. This CIP describes their concerns and comments, and outlines community involvement activities planned for the LSGPS. The EPA is committed to fully involving potentially affected community members who are interested in the LSGPS activities and decisions. These opportunities for community involvement are explained in the sections that follow. The EPA Region 8 office will be responsible for implementing the community engagement program outlined in this CIP. This CIP will be modified as necessary to meet changing needs as activities at the site progress.

The remaining CIP sections are as follows.

2.0 Site Background: This section identifies the location, land uses, recent agency activities, and the potential nature of the threat of the hazardous substances at the LSGPS.

3.0 Community Background and Concerns: This section describes the communities affected by the LSGPS and documents their concerns.

4.0 Objectives of the Community Involvement Program: This section provides the basis for, and clarifies the goals of, the Community Involvement Program.

5.0 Community Involvement Activities: This section describes the activities suited to meet specific community needs and is designed to promote effective community involvement at the LSGPS.

6.0 References: This section contains a list of references used in the CIP.

7.0 Resources: This section summarizes the information contained in the CIP appendices.

2.0 Site Background

2.1 Location

The LSGPS is located on the outskirts of Billings, Montana and consists of chlorinated solvent contamination in soil and groundwater. The groundwater contamination underlies approximately 580 acres. There are four contaminants of concern for the LSGPS: tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2-dichloroethene, and vinyl chloride. Based on current data, the contaminated groundwater plume is estimated to extend from the Beall Trailers Inc. (Beall) property on the south, and Brickyard Road and Klenck Lane on the east, to the Yellowstone River on the north and west. The Yellowstone River is the main surface water feature within the LSGPS, and it is located approximately 4,600 feet downgradient of the Beall Source Area.

Current land use within the LSGPS is characterized as residential, commercial, and "light" industrial. The primary source of domestic use water within the LSGPS is from the public water supply, which obtains its water from the Yellowstone River. However, limited full-use domestic, other domestic (such as irrigation), commercial, and nondomestic use water is known to come from the shallow alluvial aquifer via individual wells.

2.2 Operations History

The two main sources of contamination at the LSGPS are Beall and Soco West properties within the site boundaries.

In 1976, Beall bought property in the Lockwood area to begin manufacturing and repairing tanker truck trailers, primarily for the transportation of asphalt. In 1978, Beall began cleaning the trailers with a solution of TCE and steam prior to making any repairs. This TCE solution was discharged into the septic system, thereby contaminating the soil on the Beall site. These operations continued until 1990. The TCE contamination migrated downward through the soil, eventually impacting the groundwater.

Previous owners of the property now owned by Soco West began a chemical re-packaging and distribution company in Lockwood in 1972. The company historically released many different compounds, such as TCE, PCE, petroleum products, and other organic compounds that also resulted in groundwater contamination.

2.3 Nature and Extent of Contamination

The LSGPS consists of soil and groundwater adversely impacted by chlorinated solvents. There are two main source areas where contaminated soil is leaching into the groundwater: Beall and Soco West. The groundwater contamination extends from Beall on the south to the Yellowstone River on the north. The contaminated groundwater underlies approximately 580 acres of land.

2.4 Summary of Investigation Activities

In 1986, the Lockwood Water and Sewer District discovered the presence of benzene and other chlorinated solvents in their water supply wells. MDEQ began to investigate the source of the contamination. Potential sources originally investigated included underground storage tanks and a petroleum pipeline near these wells. After testing private residential and commercial wells, MDEQ found several wells that exceeded the EPA's Maximum Contaminant Level for the chlorinated solvents. The EPA's Emergency Removal Program provided clean drinking water for residences at these wells.

The EPA added the LSGPS to the NPL in December of 2000. The EPA and MDEQ also sampled indoor air and provided mitigation for indoor air contamination. In 2002, MDEQ began a remedial investigation of the site, which included surface and subsurface soil sampling, monitoring well construction and groundwater sampling, aquifer testing, surface water and sediment sampling, and indoor air sampling. In July of 2004, a Feasibility Study was completed. The EPA and MDEQ issued a Record of Decision for the LSGPS in August 2005.

2.5 Summary of Community Involvement Activities

The community involvement at the LSGPS site began in 1998, when MDEQ began looking for private wells to sample. After finding elevated levels of chlorinated solvents in the groundwater and private drinking water wells, the MDEQ and EPA began holding public meetings at the Lockwood School. MDEQ interviewed home and business owners in the affected area and established a CIP in 2001. MDEQ continued to hold public meetings as the Public Health Assessment, Remedial Investigation Report, and Feasibility Study were released. MDEQ mailed postcards informing all interested parties of the availability of these documents, as well as placing newspaper ads in the Billings Gazette and Billings Outpost with information on the

public meetings. When the Proposed Plan was released, the EPA and MDEQ accepted written comments in addition to comments presented at the public meeting/hearing in 2004. A postcard was mailed informing interested parties of the public comment period for the Proposed Plan. If requested, a Proposed Plan was sent to the interested party. Also, MDEQ provided a press release, newspaper ads, and television interviews on the Proposed Plan.

3.0 Community Background and Concerns

3.1 Lockwood Community Background

In 1988, the Lockwood Fire Service Area was formed, and in 1989 grew to the Lockwood Rural Fire District #8. Since that time, the District has experienced tremendous growth, and now operates two ambulances with paramedic service, hazmat, rescue, and fire operations. The Lockwood Water and Sewer District started in 1955, and the wells were drilled to serve the first initial members of the association. In 1987, the Lockwood Water Treatment Plant was constructed to serve the community using the Yellowstone River as its supply. This plant now serves around 6,000 people with 45 main lines.

3.2 Population and Demographics

Population

According to data obtained in 2007, Lockwood has a total land area of 7.46 square miles, with a population density of 624 people per square mile. This gives a total population of 4,655 people in July 2007, although the Lockwood services, such as School and Fire Districts, serve around 7,000. The median age was 33.8 years old, and estimated median income in 2009 was $41,443, with an estimated per capita income in 2009 of $18,734 (City-Data.com 2007).

Demographics

Ethnicity statistics for Lockwood include: White (86.2%); Hispanic (5.2%); Native American (4.2%); Asian (0.9%); and African American (0.8%). Percentages of ancestries include: German (34.4%); Norwegian (12.8%); Irish (11.9%); English (10.9%); United States (6.4%); and Swedish (4.4%). Of those 25 years of age and older, 82.4% had a high school education or higher, 16.7% had a Bachelor's degree of higher, and 3.3% had a Graduate or a professional degree (City-Data.com 2007).

Employment

The most common industries for males between 2005 and 2007 in Lockwood were: construction (19%); retail trade (15%); mining, quarrying, and oil and gas extraction (9%); other services, except public administration (8%); transportation

and warehousing (8%); administrative and support and waste management services (7%); and manufacturing (7%) (City-Data.com 2007).

The most common industries for females between 2005 and 2007 in Lockwood were: health care and social assistance (25%); wholesale trade (12%); education services (11%); accommodation and food services (11%); retail trade (8%); arts, entertainment, and recreation (5%); and transportation and warehousing (5%) (City-Data.com 2007).

Religious Affiliation

Approximately 49% of the Lockwood community is affiliated with religious organizations (City-Data.com 2007). Churches in Lockwood include:

- Zoe Bible Church, 3247 Driftwood Lane
- Hope Lutheran Church, 1911 US Highway 87 E
- Fellowship Baptist Church, 423 Westgate Drive
- Montana Southern Baptist Church, 1130 Cerise Road
- Harvest Church, 1413 Rosebud Lane
- Chapel of Hope Assembly of God, 24 Nightingale Drive.

3.3 Area Activities

Pictograph Cave State Park

Pictograph Cave State Park is located five miles outside of Billings, with a new interpretive center on site. There is a vast quantity of artifacts, as well as a short paved trail leading to the pictographs. In addition, visitors can enjoy a picnic, bird watching, interpretive programs, or a nice walk outside.

3401 Coburn Road, Billings, MT (406) 254-7342

Four Dances Nature Area

The Four Dances Nature Area is a plateau located two miles east of downtown Billings. It is edged with cliffs dropping into the Yellowstone River. At Four Dances, there are many things to enjoy, including wildlife watching, hiking, nature photography, and environmental education.

Coburn Road, Billings, MT (406) 896-5013

Zoo Montana

Zoo Montana is the only zoo within a 500-mile radius. The Zoo Montana animals originate in areas of similar climate and temperature, and are set in natural habitats. As well as having many animals from the Rocky Mountains, there are also animals from the northern parts of Europe and Asia. The goal of Zoo Montana is provide an enjoyable, recreational and educational experience while providing quality care for the animal and plant collections at the zoo.

2100 Shiloh Road, Billings, MT 59106 (406) 652-8100

Yellowstone Art Museum

The Yellowstone Art Museum is one of the premier art museums in Montana that seeks to diversify with both contemporary and historical artworks. The Yellowstone Art Museum contains many unique exhibits, from swords to Hungarian artists, and from Montana artwork to ceramic arts from Montana.

401 N 27th Street, Billings, MT (406) 256-6804

Centennial Ice Arena

The Centennial Ice Arena is the only ice arena in Billings, Montana, for ice skating and hockey. Their mission is to provide a safe, fun and educational environment for ice sports in the Billings community. They offer public skates so all can enjoy the ice.

427 Bench Boulevard, Billings, MT 59105 (406) 256-1192

Moss Mansion Museum

The Moss Mansion Historic House Museum shows the turn-of-the-century life of Preston Boyd Moss and his family. Museum visitors get to see original furnishings of the time period, as well as some seasonal exhibits. The Moss Mansion is on the National Register of Historic Places, and was the home of one of the developers of Billings.

914 Division Street, Billings, MT (406) 256-5100

Legacy Doll Museum

The Legacy Doll Museum was founded by an avid Billings doll collector. It has a large collection of antique, collectible, and modern dolls. The dolls and toys are displayed in settings related to childhood. There are over 500 dolls and 4,000 toys, accessories, and playthings at the museum.

3206 6th Avenue N, Billings, MT (406) 252-0041

Yellowstone County Museum

The Yellowstone County Museum showcases the history of the Yellowstone Valley and the Northern Plains. The exhibits range from the Northern Plains Indian Tribes, western expansion, mining, cattle/sheep herding industries, transportation industries, military, various medical fields, music, textiles, household good and personal goods. The Yellowstone County Museum is collecting, preserving, researching, and interpreting the rich and diverse history of this area.

1950 Terminal Circle, Billings, MT (406) 256-6811

Community Organizations

There are many active community organizations in the Billings Area, including the Senior Citizens Center, the Community Center, the American Legion, the Elk Club, and the Moose Lodge.

3.4 Community Concerns, Comments, and Issues

To develop a CIP that accurately reflects community interests and concerns, the EPA depends heavily upon information obtained during "Community Interviews." On August 9 and 10, 2011, the EPA conducted interviews with area residents and representatives, such as community leaders, elected officials, and business representatives. The interview questions are contained in Appendix H. The responses from these interviews are grouped below according to similar themes. The EPA has made every effort to include all the responses from the interviews, as well as information from residents that has been shared subsequent to the interviews.

It is important to emphasize that this section presents the opinions and concerns of residents and other interviewees rather than those of the EPA, the state, or any Potentially Responsible Party. The information obtained in the interviews and subsequent conversations is summarized in this section. It reflects interviewees' responses and residents' concerns regardless of whether those responses or perceptions are factually precise.

The following general areas of concerns, comments, and issues have been identified from the community interviews and other sources:

- Property values
- Communication
- Timeframe.

Question: Are you familiar with the Superfund process and the Lockwood Solvent Groundwater Plume NPL Site? What do you know about them?

The majority of the interviewees were aware of activities at the LSGPS Site, either through early involvement, as a community leader, or the historical civil lawsuits.

Question: Do you have any questions or concerns regarding the upcoming cleanup actions? Is there any information we can get you regarding the Superfund process or the LSGPS site?

Most of the persons interviewed felt they had enough information regarding the site. Questions were raised regarding the sewer line expansion, how the source areas would be remediated (technologies and methods), and the potential Controlled Groundwater Area.

Question: What do you think is the best way to get information to community members and property owners (both local and remote)?

Respondents suggested the following:

- Fact sheets/direct mailings
- Billings Gazette
- Yellowstone County News
- Websites – EPA, MDEQ, RiverStone Health
- On-line news through local television channels
- Yellowstone Valley Electric bills/newsletters.

Question: How do you get important information regarding community activities? Who always seems to know what is going on?

Responses to this question varied, but sources mentioned included local business owners, veterinarians, on-line, community pages, county's public information officer, and the newspaper.

Question: Have you ever contacted anyone about the Superfund site activities? If yes, who and how?

The majority of those interviewed had not contacted anyone about the site. Those that had indicated they contacted the state during the initial response activities.

Question: Where do you go for questions about public or community health?

The most common responses included local health providers and the Billings Clinic.

Question: Who are the formal and informal community leaders? Who else should we talk to?

Respondents identified the local school board, County Commissioners, County Board of Health, and the Lockwood Water and Sewer District as local leaders. Representatives of RiverStone Health suggested the Healthy Community Coalition should be added to the site's mailing list and recommended the EPA attend a meeting if possible.

All persons interviewed requested to be added (or remain on) the site's mailing list.

4.0 Community Involvement Plan Objectives and Strategies

Based upon interviews with local community members and other interested parties, as well as other relevant information, the EPA has developed the following list of objectives for community involvement and communication for the LSGPS Site:

- Use proactive communication approach
- Formally involve local officials and other community representatives
- Comply with CERCLA/SARA requirements.

The following is a discussion of each of these objectives and the strategies the EPA will use to implement the objectives.

4.1 Proactive Approach

The EPA's objective is to use a proactive (early and often) approach to sharing information with the public. The EPA will try to provide information to as many people as possible, listen to their concerns, and answer their questions. To achieve this objective, the EPA will ensure that public health and safety issues and opportunities for public participation in site decisions are well publicized. The EPA will provide information on the Superfund process that is relevant to decisions at the site. The EPA will make certain that periodic, easy-to-read information regarding the status of site activities is provided to the community. The information will enable the community to keep up-to-date and be well-informed about site activities.

The EPA will use various techniques, some suggested by the community, to provide site information to the public. One effective way to share information with area residents is providing updates for the newspapers and on the internet. The Billings Gazette, in particular, appears to be one of the most effective ways to reach Lockwood residents. The EPA will continue to produce fact sheets and flyers when appropriate, and use direct mail and local distribution routes to get information to residents and other interested parties. The EPA will hold public meetings and periodically attend established community organization meetings. The EPA will maintain a web page dedicated to the LSGPS Site to update people on activities, decisions, and issues regarding the site. This web page will also provide contact information so community members can communicate issues and concerns back to the EPA.

4.2 Formally Involve Local Officials and Other Community Representatives

The EPA's objective is to formally involve local officials and other community representatives in the Superfund process and maintain ongoing, two-way communication with the community. Community leaders and local governmental and non-governmental organizations have expressed an interest in the EPA communicating regularly with them, informing them in advance of major decisions or events, and formally inviting them to public meetings and other public activities. To accomplish this objective, the EPA will make an effort to formalize communication of site activities. The EPA will continue to offer the community opportunities to participate.

4.3 Comply with CERCLA/SARA Requirements

The EPA's objective is to comply with CERCLA/SARA requirements. In addition to the above activities, others will be planned specifically to meet the community relations requirements under CERCLA/SARA. A detailed description of these activities is found in the Section 5.0 of this CIP.

5.0 Community Involvement Activities

This section describes the community involvement activities that the EPA plans to conduct during the course of the Superfund cleanup actions. These activities are designed to provide information to community members and provide opportunities for them to be involved in the decision-making process. The EPA is currently the lead government agency in the remediation of the LSGPS. As such, the EPA will ensure full public participation in the Superfund cleanup process. Many of the activities listed below have been implemented prior to the publication of this CIP. These activities include those required by CERCLA/SARA. In addition, other site-specific support activities are important tools for keeping the community informed and involved. These site-specific activities will be implemented in response to community input and requests.

5.1 Activities Required by CERCLA/SARA

Designate a Spokesperson

Mr. Leslie Sims, the EPA RPM, is the designated spokesperson for all actions regarding this federal superfund site.

Notify Affected Citizens

Mr. Sims will, in a timely matter, inform the community, state, and local officials of plans, decision-making processes, and actions taken. He will respond to inquiries and provide information concerning the actions taken. His contact information is located in Appendix A of this CIP.

Establish Information Repository

The EPA established the Information Repository at the MSU-Billings Library, located at 1500 University Drive, Billings, MT.

Conduct Community Interviews

The EPA interviewed residents and local officials in August 2011. The results of interviews are presented in Section 3.4.

Prepare and Revise the Community Involvement Plan

This CIP is developed for public review and use by the community, and is intended to be updated and revised as the LSGPS Site remediation progresses.

5.2 Site-Specific Support Activities

In addition to the community involvement activities described above, the EPA considers the following community involvement activities important in helping the public provide meaningful input to the ongoing site activities. The full extent of these site-specific support activities will depend on resources available. A brief discussion of each of these activities follows.

Prepare Fact Sheets and Site Activity Updates

The EPA's Community Involvement Coordinator will produce a variety of fact sheets for publication and distribution. These fact sheets may vary from an informal paragraph for a school or church flyer, to a multi-page summary of a specific topic. In all cases, the EPA and other stakeholders will benefit from having a thorough review of the fact sheets for accuracy, readability, and visual appeal. The EPA may, at times, ask community members to review fact sheets to ensure they are clear and convey relevant information. The EPA is open to suggestions from potentially affected interests on topics to write about, based on their relevancy to the LSGPS activities and their importance to the general public. These materials will be distributed to those on the mailing list and will also be available to the general public through the information repository, the EPA's website, and by request.

Issue Press Releases and Other Informational Ads to News Outlets

The EPA will issue press releases to make official statements at milestones in the Superfund process, such as key project dates, major decisions, or completion of cleanup actions. It is the EPA's policy not to negotiate the timing or content of a press release. However, in an effort to communicate openly with affected stakeholders, the EPA will send all press releases related to the LSGPS to interested parties at the same time it sends the release to the press.

The EPA will try to alert community members about current events that may generate media interest and/or a press release. Anyone whose name is given to the press about any issue will be notified immediately. The EPA will, at times, provide notices of events in the form of a display ad in the Billings Gazette.

Coordinate Workshops, Small Group Meetings, Large Public Meetings, and Meetings with Individuals

Meetings with the community provide a forum for presentation and exchange of information. The EPA will make an effort to present materials in a non-technical format and provide opportunities for interaction with meeting attendees to ensure that the information is understood. Such meetings also could be used to present a wide variety of information updates or to give slide shows or videotape presentations on site activities.

If necessary, specialized information such as sampling or sample results, risk assessment, cleanup status, etc., will be presented in workshops, small group meetings, and large public meetings. Meetings make it possible for the EPA to get immediate feedback from the public on site specific issues. The EPA staff remains available for interested parties to discuss their concerns on a person-to-person basis. When possible, the EPA will share information directly with residents at their homes, particularly during field work such as sampling or cleanup.

Brief Local Officials

The EPA will inform local officials of key events and activities. Formal notification of key events and activities and advance information on decisions and events are important to local officials. The EPA's recent efforts in this regard have been effective according to interviewees and, therefore, should be continued.

Maintain an Accurate Mailing List

The EPA will continuously look for ways to build its mailing list of people interested in receiving information on the investigation and cleanup of the area affected by the LSGPS and related information. The EPA will also maintain a list of e-mail addresses for those that prefer to be notified by electronic mail.

6.0 References

City-Data.com, 2007. Lockwood, Montana. http://www.city-data.com/city/Lockwood-Montana.html

Lockwood Firefighters, 2011. http://lockwoodfire.com/Local3658/Local3658.htm

Lockwood Water and Sewer District. “General Description of Water System.” http://www.lockwoodwater.com/aboutus.htm

U.S. Environmental Protection Agency and Montana Department of Environmental Quality, 2005. Record of Decision Lockwood Solvent Groundwater Plume Site. August 2005.

7.0 Resources

This section summarizes the information contained in the appendices attached to this report. These appendices contain specific reference information that will be used by the EPA when conducting community involvement activities for the LSGPS. They are as follows:

Appendix A - Contacts: This appendix contains the information necessary to contact parties associated with the clean-up activities in the vicinity of Lockwood. Contact information includes the available addresses, telephone numbers, fax numbers, and e-mail addresses of various contacts. Contacts include such parties as federal, state, and local agency officials.

Appendix B - Information Repositories: This appendix lists the addresses of the administrative record and information repositories

Appendix C - Public Meeting Locations: This appendix contains information on available meeting locations, such as meeting place capacity, hours of availability, location, and cost.

Appendix D - Community Resource Centers: This appendix contains address and contact information for various local resources centers. Resource centers include such facilities as information outlets, public assistance, and resources for seniors.

Appendix E - Local Media: This appendix contains essential local media information, such as the address, contact, and publication schedule information.

Appendix F - Elected Officials: This appendix contains the names, addresses, telephone numbers, facsimile numbers, and e-mail addresses of federal, state and local elected officials representing the community of Billings, Montana.

Appendix G - Community Interview Questionnaire: This appendix contains the community interview questionnaire form used by the EPA to identify the Lockwood communities' concerns associated with cleanup activities.

Appendix A
LSGPS, Montana: Contacts

Contact Name/Contact Title	Mailing Address	Phone Number Fax Number	Email
Leslie Sims Remedial Project Manager Environmental Protection Agency	US EPA Region 8 10 W 15th St, Suite 3200 Helena, MT 59626	406-457-5032 (fax) 406-457-5056	sims.leslie@epa.gov
Leslie Sims Community Involvement Coordinator US Environmental Protection Agency	US EPA Region 8 10 W 15th St, Suite 3200 Helena MT, 59626	406-457-5032 (fax) 406-457-5056	sims.leslie@epa.gov
John Podolinsky Federal Superfund Project Manager Montana Department of Environmental Quality	Montana DEQ Remediation Division 1100 North Last Chance Gulch Helena, MT 59601	406-841-5040 (fax) 406-841-5050	jpodolinsky@mt.gov
Dan Strausbaugh, MPH U.S. Public Health Service Agency for Toxic Substances and Disease Registry	ASTDR/DRO/R8 10 W 15th St, Suite 3200 Helena, MT 59626	406-457-5007 (fax) 406-457-5056	strausbaugh.dan@epa.gov
Steve Helgerson, MD, MPH State Medical Officer Montana Department of Public Health and Human Services	1400 Broadway Helena, MT 59620	406-444-1286 (fax) 406-444-7465	shelgerson@mt.gov
Carol Ballew, PhD Senior Public Health Epidemiologist Montana Department of Public Health and Human Services	Office of Epidemiology and Scientific Support, MT DPHHS 1400 Broadway C-317 Cogswell Helena, MT 59620	406-444-6988 (fax) 406-444-6943	cballew@mt.gov
Russ Boschee Sanitarian RiverStone Health Environmental Health Services	Environmental Health Services RiverStone Health Campus 123 South 27th St Billings, MT 59101	406-256-2770 (fax) 406-256-2767	Russ.bos@riverstonehealth.org

Appendix B
LSGPS, Montana: Information Repositories

Information Repository	Street Address	Contact Name	Phone Number	Hours of Operation
U.S. EPA Records Center EPA Montana Office	EPA Montana Office, Superfund Records Center 10 West 15th Street Suite 3200 Helena, MT 59626	Lori Hallauer	406-457-5046 or 406-457-5000	Monday through Friday 8:00 a.m. to 4:00 p.m. (excluding holidays)
MSU Billings Library	1500 University Drive Billings, MT 59101	Reference Librarian	406-657-2011	Hours vary, please visit http://www.msubillings.edu/library/Hours.htm for hours of operation

Appendix C
LSGPS, Montana: Public Meeting Locations

Facility	Address	Phone Number	Accommodations/Availability/ ADA Compliance
Lockwood School	1932 Hwy 87 E Billings, MT 59101	406-252-6022	Variety of rooms accommodate from 12-200 persons Availability is flexible Building is ADA compliant

Appendix D
LSGPS, Montana: Community Resource Centers

Resource Center	Street Address	Phone Number Fax Number	Contact Name Contact Title	Resource(s) Provided
Boys and Girls Club of Yellowstone County	505 Orchard Lane Billings, MT 59101	406-245-4457 (fax) 406-252-3633		Education, Career Skills, Leadership, Arts, Health
Billings Chamber of Commerce Convention and Visitors Bureau	815 South 27th St Billings, MT 59101	406-245-4111 (fax) 406-245-7333		Advocate, promote, network, and support businesses
RiverStone Health – Environmental Health Services	123 South 27th St, 4th Floor Billings, MT 59101	406-256-2770	Russ Boschee Sanitarian	Foster safe and healthful environments in the community
Housing Authority of Billings	2415 1st Ave N Billings, MT 59101	406-245-6391 (fax) 406-245-0387		Safe, basic, affordable housing
Meals on Wheels	1501 14th St W Suite 320 Billings, MT 59102	406-259-9666		Meals for seniors at least 60 years of age and homebound
Montana Dept of Public Health and Human Services	111 North 31st St Billings, MT 59101	406-237-0520 (fax) 406-237-0572	Brenda Rush, County Director	Health Well-being Self-reliance
Salvation Army	2100 6th Ave N Billings, MT 59101	406-245-4659	Major Kevin E. Jackson	Basic Human Needs Holiday Assistance Senior Programs
Senior Citizens Center	360 N 23rd St Billings, MT 59101	406-657-3050		Health Education Recreation
United Way of Yellowstone County	2920 2nd Ave N Billings, MT 59101	406-252-3839		Education Income Health

Appendix E
LSGPS, Montana: Local Media

Name	Mailing Address	Phone Number Fax Number	Media Type
Billings Gazette	PO Box 36300 Billings, MT 59107 http://www.billingsgazette.com	406-657-1200 (Toll Free)1-800-543-2505	Daily Newspaper
Billings Outpost	1833 Grand Ave Billings, MT 59102 www.billingsnews.com	406-248-1616	Weekly Newspaper
Yellowstone County News	748 Railroad Highway Huntley, MT 59037	406-348-2649	Weekly Newspaper
KULR TV 8	2045 Overland Ave Billings, MT 59102 http://www.kulr8.com	406-656-8000	Local Television NBC Affiliate
KTVQ TV 2	3203 3rd Ave N Billings, MT 59101 http://www.ktvq.com	406-252-5611 (fax) 406-252-9938	Local Television CBS Affiliate
KBUL 970 am	27 North 27th Street 23rd Floor Crowne Plaza Billings, MT 59101 http://newsradio95.com	406-294-0970 406-248-7827	Local Radio News Talk
KEMC 91.7 fm	1500 University Drive Billings, MT 59101 www.yellowstonepublicradio.org	406-657-2941 800-441-2941	Local Radio News Talk

Appendix F
LSGPS Site, Montana: Elected Officials

Contact Category	Association or Department	Contact Name Contact Title	Mailing Address	Phone Number	Email Address or website
Federal Government	U.S. Congress	Jon Tester U.S. Senator	724 Hart Senate Office Building Washington, DC 20510	202-224-2644	http://tester.senate.gov
			Granite Tower 222 N 32nd St, Suite 102 Billings, MT 59101	406-252-0550	
		Max Baucus U.S. Senator	511 Hart Senate Office Building Washington, DC 20510	202-224-2651	http://baucus.senate.gov
			Granite Tower 222 N 32nd St Suite 100 Billings, MT 59101	406-657-6790	
		Dennis Rehberg U.S. Representative	2448 Rayburn House Office Building Washington, DC 20515	202-225-3211	http://rehberg.house.gov
			1201 Grand Avenue Billings, MT 59102	406-256-1019	

Appendix F (Continued)
LSGPS, Montana: Elected Officials

Contact Category	Association or Department	Contact Name Contact Title	Mailing Address	Phone Number	Email Address or website
State Government	Governor of Montana	Brian D. Schweitzer Governor	Montana State Capitol Building Post Office Box 200801 Helena, MT 59620	406-444-3111	http://governor.mt.gov
	Montana State Senate	Taylor Brown State Senate District 22	775 Squaw Creek Rd Huntley, MT 59037	406-348-2070	taylor@northernbroadcasting.com
	Montana State Congress	Jonathan McNiven State House District 44	3445 Rock Pillar Rd Huntley, MT 59037	406-672-5941	jonathanmcniven@gmail.com
County Government	Yellowstone County Commissioner	John Ostlund District One	PO Box 35000 Billings, MT 59107	406-256-2701	jostlund@co.yellowstone.mt.gov
	Yellowstone County Commissioner	Jim Reno District Two	PO Box 35000 Billings, MT 59107	406-256-2701	jreno@co.yellowstone.mt.gov
	Yellowstone County Commissioner	Bill Kennedy District Three	PO Box 35000 Billings, MT 59107	406-256-2701	bkennedy@co.yellowstone.mt.gov

Appendix G
LSGPS, Montana: Community Interview Questionnaire

1. Are you familiar with the Superfund process and the Lockwood Solvent Groundwater Plume NPL Site? What do you know about them?

2. Do you have any questions or concerns regarding the upcoming cleanup actions? Is there any information we can get you regarding the Superfund process or the LSGPS site?

3. What do you think is the best way to get information to community members and property owners (both local and remote)?
   - Fact sheets/direct mail
   - Billings Gazette
   - Meetings
   - Website
   - Other?

4. How do you get important information regarding community activities? Who always seems to know what is going on?

5. Have you ever contacted anyone about the Superfund site activities? If yes, who and how?

6. Where do you go for questions about public or community health?

7. Who are the formal and informal community leaders? Who else should we talk to?

8. Do you want future information? May we add you to the mailing list?