

**U.S. ENVIRONMENTAL PROTECTION AGENCY****Response to Recommendations  
National Environmental Justice Advisory Council (NEJAC)****Report Title:**

*Environmental Justice and Federal Facilities: Recommendations for Improving Stakeholder Relations Between Federal Facilities and Environmental Justice Communities* (October 2004): National Environmental Justice Advisory Council (NEJAC), a Federal advisory committee.

**Focus of Recommendations:**

This report presents recommendations to the U.S. Environmental Protection Agency, as well as other agencies associated with the cleanup of Federal facilities, with the aim of improving relationships between facilities, communities, regulators, and governmental bodies involved in the cleanup of contaminated Federal facility sites. The report identifies five general areas for improving the relationship between Federal facilities and their affected communities and reducing the negative impacts on these communities from cleanup activities at Federal facilities. Recommendations were based on data gathered and analyzed during the site visits, as well as additional research conducted by the Federal Facilities Working Group (FFWG). The recommendations were categorized into five topic areas: A) enhanced community assessments and communication methods needed to improve cultural sensitivities for communities facing environmental justice issues; B) access to adequate health services needed; C) additional resources for capacity-building needed; D) improved and effective communication needed between facility/regulators and communities facing environmental justice issues; and E) new and consistent opportunities needed to help communities facing environmental justice issues to influence decisions at Federal facilities undergoing cleanup/remedial actions.

**EPA's Response:**Overview

This report represents considerable effort by the FFWG to understand and document the EJ concerns and activities of the affected communities and agencies at five Federal facility sites. EPA appreciates all of the hard work necessary to produce this report. Many of the same concerns were identified at several or, in some cases, all of the sites. The report also shows that EPA, DOD, DOE, and the affected States have mobilized significant resources to address EJ issues. According to the report, these efforts by the regulators/Federal agencies have not always been successful. The report will help EPA and, presumably, the other regulators/Federal agencies to better target scarce resources for optimal results in this important program area.

We see the recommendations of this report falling into the following three overarching categories:

- 1) Site-specific recommendations,
- 2) EPA-HQs recommendations, and
- 3) Recommendations beyond the scope of EPA.

For the site-specific recommendations, EPA-HQs held discussions with the EPA Region in which each site is located. Those Regions then provided written responses to each of the site-specific recommendations. These responses are summarized in the next section and are attached in their entirety.

The EPA-HQs recommendations are laid out in the first paragraph above. We believe the Agency can address the issues of: A) enhanced community assessments and communication methods needed to improve cultural sensitivities for communities facing environmental justice issues; C) additional resources for capacity building needed; D) improved and effective communication needed between facility/regulators and communities facing environmental justice issues; and E) new and consistent opportunities needed to help communities facing environmental justice issues to influence decisions at Federal facilities undergoing cleanup/remedial actions. Potential mechanisms to address these concerns include policy and/or guidance changes, resource redistribution, and training. EPA's Region 9 has agreed to detail a community relations expert to FFRRO to analyze potential actions we may want to take to address these recommendations.

The last category includes those recommendations considered to be beyond the scope of EPA's authority. These include health studies and compensation for perceived adverse health impacts from the contaminated sites. Recommendation B) above (i.e., access to adequate health services needed) captures these concerns. CERCLA has provisions for ATSDR to address these types of concerns. We have distributed this report to ATSDR and we will continue to work with them wherever possible to address these concerns.

### Summary of Site-Specific Recommendations

A total of 32 site-specific recommendations were made for the five Federal facility sites that the FFWG visited. The recommendation themes common at virtually all the sites were better communication (including increased sensitivity and simplifying technical jargon), more resources, clarifying regulators roles and addressing health impacts. The Regions' full responses to the site-specific recommendations are attached.

Better communication between EJ communities and the regulators, as well as among different factions of communities and among the various regulators, was an oft-expressed concern. Better communication is a broad term and encompasses such needs as: 1) more training so the regulators have a better understanding of the cultural sensitivities of the communities, 2) increased efforts by the regulators to explain, both verbally at meetings and in written documents, the technical aspects of the site cleanup in terms more easily understood by the layman, and 3) increased outreach so a broader spectrum of the community than just the official citizen advisory boards are brought into the process.

The Regional responses to these recommendations described a wide-ranging array of groups and other sources which can address these concerns. Some of these organizations are currently attempting to address these issues and the Regions have committed to improving the efficacy of those efforts. Other Regional responses commit to encouraging groups/organizations to add efforts that will address the FFWG recommendations.

All of the Regions have implemented cultural sensitivity training and have committed to continuing and improving these efforts. For example, at the Defense Depot in Memphis, Tennessee (Region 4), the EPA, State, and DoD agency representatives have received EJ/Diversity/Risk Communication training through their respective agencies. These personnel recently completed refresher training specific to site issues, including Depot contractor personnel and additional, in-depth training is planned in FY 06.

Also, in Region 6 at the Fort Wingate Depot, the New Mexico Environment Department's (NMED) draft RCRA permit requires the Army to develop a Community Relations Plan that includes consultation with key stakeholders throughout the closure and corrective action processes. The key stakeholders include The Army, NMED, the Navajo Nation, Pueblo of Zuni and the Department of Interior/Bureau of Land Management. EPA will work with NMED to ensure that formal cultural sensitivity training occurs if it is requested.

Furthermore, in Region 10 at the Hanford DOE site, EPA, DOE and the State of Washington have agreed to develop a contract with the Confederated Tribes of the Umatilla Indian Reservation to set up a cultural awareness class for project managers. Several EPA project managers attended this training a few years ago and found it to be very educational and time well spent. It is anticipated that this training will be held in spring 2006 on the Umatilla Indian Reservation. In addition, the region surrounding Hanford is comprised of a large Hispanic population, particularly in the Yakima Valley, and there is the potential to develop cultural diversity training with local resources. The EPA Hanford Project Office has scheduled an environmental justice training for November 8, 2005, for Tri-Party Agreement personnel.

At several sites, efforts are underway to place additional local community members and minorities on advisory boards and state/EPA staffs.

Explaining the technical aspects of a site cleanup has always been a challenging task. With the wide range of experience and education at a typical community meeting, it is often very difficult to present and discuss technical information in a way that meets everyone's needs. All of the

Regions are focusing resources in this area with actions ranging from additional sources of funds for training workshops to developing standardized visual aids which answer common questions.

Several of the site-specific recommendations requested that more resources be made available for increased outreach to community groups to assist technical understanding and to assist in developing comments during the remedial decision-making process. Such comments can occur at several stages of the RCRA and CERCLA processes. For example, the public can comment at public meetings, at the site investigation phase, at the site feasibility study (CERCLA) or corrective measures (RCRA) phase and at the Proposed Plan (CERCLA) or Corrective Measures Implementation work plan (RCRA) phase. Besides committing to increase the scope of several existing organizations, the Regions will help community groups obtain funds through sources such as Technical Outreach Services for Communities (TOSC) and EPA's Office of Environmental Justice Small Grants Program.

Another area of commonality in the site-specific recommendations was the desire to clarify the various roles of the regulators. The procedural framework of the CERCLA and RCRA cleanup processes is often confusing and complex, especially at Federal facility sites where often two or more Federal agencies have significant roles in addition to state and local governments. The Regions have committed to developing pamphlets, handouts and/or charts to clearly explain these roles and responsibilities. These materials will be readily available for use at meetings and workshops.

Recommendations at three out of the five sites concerned the impacts of perceived health effects and/or health studies. EPA will ensure that ATSDR receives these recommendations.

## Conclusion

EPA would like to thank the National Environmental Justice Advisory Council and its Federal Facilities Working Group for their efforts in producing this report. EPA-HQs and the Regions are moving to address the report's issues and concerns and we will provide periodic updates on our progress.

## **Background:**

In May 2000, the NEJAC Executive Council recommended that a working group be established to examine these issues and prepare recommendations to address these concerns. As a result, EPA established the Federal Facilities Working Group (FFWG) to identify and prioritize key issues of concern to communities facing environmental justice issues regarding environmental cleanup activities and operations at and around Federal facilities, and to formulate a set of national policy recommendations to address those concerns.

The FFWG provided a forum for dialogue with appropriate government agencies to discuss ways to actively and constructively engage these communities. On December 11, 2000, DOI, DoD, DOE, and EPA signed a Memorandum of Understanding (MOU) [contained in Appendix C of

the report] to establish policies and procedures for a general working agreement among these four agencies in support of the NEJAC's FFWG.

As a part of its mission statement, the FFWG stated its plans to "go out and work with communities near Federal facilities with environmental issues (including cleanup) and speak with communities and agencies and compile information to develop and provide a small number of focused recommendations." The five site visits included: DoD's Kelly Air Force Base (San Antonio, TX), Fort Wingate (Gallup, NM), and Memphis Defense Depot (Memphis, TN); and DOE's Savannah River Site (Aiken, SC), and Hanford Site (Richland, WA). The site visits examined the quality of the relationship between the Federal facility and its nearby communities.

The FFWG developed site visit reports, which provided information on each site, and analyzed the common variables associated with the cleanup of each site, the environmental justice issues associated with each site, stakeholder participation; and key findings. The reports also provided recommendations for the stakeholder process and its implementation, presented a summary of the key site visit issues, and provided a list of "lessons learned." The site visit reports served as background information to final recommendations report.

**Office[s] Leading Review:**

Office of Solid Waste and Emergency Response's (OSWER) Federal Facilities Restoration and Reuse Office (FFRRO).

**Points of Contact:**

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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

SAM NUNN ATLANTA FEDERAL CENTER  
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ATLANTA, GEORGIA 30303

### MEMORANDUM

DATE: September 27, 2005

SUBJECT: Regional Response for NEJAC Recommendations for Savannah River Site, Aiken, South Carolina (SRS), and Defense Depot, Memphis, Tennessee (DDMT)

FROM: Kenneth R. Lapierre, Chief  
Federal Facilities Branch  
Waste Management Division

TO: James Woolford, Director  
Federal Facilities Restoration and Reuse Office

The following is submitted in response to recommendations made by the National Environmental Justice Advisory Council (NEJAC) in its report on *Environmental Justice and Federal Facilities* dated October 2004. NEJAC made site-specific recommendations for two facilities in Region 4; Savannah River Site, located in Aiken, South Carolina, and Defense Depot, Memphis, located in Tennessee.

Please feel free to contact me at (404) 562-8570 if you have questions or comments.

## Regional Response for NEJAC Recommendations

Site: Savannah River Site

Office Preparing Response: U.S. EPA Region 4, Waste Management Division, Federal Facilities Branch

Regional Contact: Dawn Taylor, 404-562-8575, taylor.dawn@epa.gov

**NEJAC Recommendation #1: Recognize the value of input from stakeholders outside of the Savannah River Site Citizens Advisory Board (CAB) process.** Environmental justice communities in both Georgia and South Carolina have worked consistently to participate in the decision-making processes and activities at SRS, particularly during the EIS process. Concerns and questions have been documented and submitted to SRS and DOE over the years with varying degrees of response. The responses to the community have often taken long periods of time with no evidence that consideration was given to either their concerns or questions.

**Regional Response #1:** Under CERCLA, there are very specific activities required to meet community relations requirements. The public is provided multiple opportunities throughout the planning and implementation of cleanup to become involved in the CERCLA remedial process. As the proposed plan is ready to be issued for public comment, DOE publishes a notice of availability of the proposed plan and a brief summary. The notice of availability includes and announces the beginning and end of the public comment period. The proposed plan and all supporting information are made available in the administrative record file. A member of the public may request a public meeting to be held to discuss the action. In addition, DOE regularly provides information and presentations at CAB meetings about upcoming actions. Following the receipt of significant comments, criticisms and new data submitted by the public on the proposed plan and RI/FS, DOE prepares a responsiveness document that accompanies the ROD for the remedial action. To document the selection of a remedial action, the signed ROD is made available for public review. One part of the signed ROD is a responsiveness summary that includes any public comments that were received during the public comment period as well as the lead agency's response to the comment. EPA seriously considers all concerns, comments, and questions posed by the public in the decision making process.

As a RCRA permittee, DOE notifies the public when it has requested that SCDHEC modify its RCRA Permit. SCDHEC issues fact sheets on the RCRA Permit, maintains the RCRA Administrative Record File, and makes final Permit decisions. Both SCDHEC and DOE advertise or announce proposed and final Permit modifications, solicit public comments, hold public meetings, respond to public comments, and communicate Permit decisions to the public.

DOE's Environmental Management program and EPA have been in partnership with Citizen's for Environmental Justice (CFEJ) and Savannah State University since 1994. CFEJ is a community-based organization that works in concert with community leaders and groups from Georgia and South Carolina. CFEJ provides another opportunity for the public to voice their questions and concerns.

EPA will continue to work with DOE and SCDHEC to seek community involvement and public participation. EPA will actively seek opportunities to enhance the public involvement process and reach out to the community through EPA's environmental justice contacts and community involvement coordinators.

**NEJAC Recommendation #2: Recognize that even though the CAB is the official mechanism through which citizens and stakeholders provide input and advice to DOE and SRS, the Federal Facilities Environmental Restoration Dialogue Committee (FFERDC) called for additional ways of participation.** The CAB represents one way of doing business that often precludes the real and meaningful involvement of members of environmental justice communities. These communities, as a significant part of the impacted communities, believe their voice must be actively sought after, that it must be integrated into the process; and that they must be informed about the outcomes of their input and involvement.

**Regional Response #2:** EPA, DOE, and SCDHEC have sponsored multiple workshops and availability sessions by way of outreach and education. These efforts are extremely resource intensive, are duplicative of CAB activities, and were undertaken to enhance participation in site activities. Unfortunately, many of these sessions were not widely attended by the community. As discussed in the previous response, there are numerous opportunities, separate from the CAB, for public participation and involvement throughout the RCRA and CERCLA processes.

DOE's Environmental Management program and EPA have been in partnership with Citizen's for Environmental Justice (CFEJ) and Savannah State University since 1994. CFEJ is a community-based organization that works in concert with community leaders and groups from Georgia and South Carolina. CFEJ was established to provide another opportunity for the public participate in the decision making process and voice their questions and concerns.

EPA will continue to work with DOE and SCDHEC to seek community involvement and public participation. EPA will actively seek opportunities to enhance the public involvement process and reach out to the community through EPA's environmental justice contacts and community involvement coordinators.

**NEJAC Recommendation #3: Create a community advisory panel to address issues of trust building.** Mistrust or lack of trust in both DOE and SRS is a recurring theme and poses a challenge to outreach efforts and activities. Environmental justice communities do not trust the information they are receiving from the site about the level of contamination on and off site and the past and potential impacts to their health and immediate environment. Current public involvement approaches and methods of disseminating and sharing information are not having a positive affect on the attitudes of mistrust. A community advisory panel is recommended as a first step in creating both an environment and structure where issues of past and present mistrust can be addressed and resolved. The community advisory panel would be composed of environmental justice community leaders from both Georgia and South Carolina working in collaboration with DOE, SRS and Westinghouse Savannah River Company. SRS has an opportunity to address this critical issue by: 1) providing access to understandable, credible information, 2) ensuring transparency of the process, 3) including input from environmental justice communities in the cleanup decision-making process; and honestly addressing the



concerns of environmental justice communities and their lack of trust in presented data and the official advisory process.

Regional Response #3: DOE's Environmental Management program and EPA have been in partnership with Citizen's for Environmental Justice (CFEJ) and Savannah State University since 1994. CFEJ is a community-based organization that works in concert with community leaders and groups from Georgia and South Carolina. CFEJ, in collaboration with the site and Savannah State University, conducts community workshops designed both to inform and gather information from the community. EPA will present NEJAC's concerns to CFEJ and encourage them to seek ways to address the issues raised in this report.

NEJAC Recommendation #4: **Develop and distribute culturally sensitive and community friendly documents and findings.** Environmental justice communities have consistently requested data and site documents to be disseminated to them in a format and language that they can understand and analyze for the purpose of providing stakeholder input. The documents distributed are very technical, use scientific language, charts, graphs and tables, and are never accompanied by a community-friendly version so that they can be understood by laypeople. In addition, these documents are not being distributed to community members and the public at large in a timely manner to allow for adequate review and submittal of public comments; more often, laypeople are not prepared to provide valid comments. Environmental justice communities desire significant and meaningful participation, but are limited because they do not understand the information about the nature of the contamination, the technology to remediate and the potential impacts. CFEJ has been identified as an environmental organization that provides translation and interpretation of site data and documents. A collaborative effort between the site, environmental justice communities, and CFEJ could institutionalize new and creative ways of providing information to this group of stakeholders. This could assist in building positive partnerships and ultimately a new relationship.

Regional Response #4: The nature of the cleanup activities being conducted is very technical. In communicating about such projects, the difficulty is always in striking a balance between enough technical information to provide a working understanding and providing it in layman's terms. As mentioned in this recommendation, CFEJ has been identified as an environmental organization that provides translation and interpretation of site data and documents. EPA has recommended to DOE to pursue a collaborative effort between the site, environmental justice communities, and CFEJ to institutionalize new and creative ways of providing information to this group of stakeholders. This will assist in building positive partnerships and ultimately a new relationship. EPA will present NEJAC's concerns to CFEJ and encourage them to seek ways to address the issues raised in this report. In addition, Technical Assistance Grants (TAG) are available from EPA. A TAG provides money for activities that help the community participate in decision making at eligible Superfund sites. An initial grant up to \$50,000 is available to qualified community groups so they can contract with independent technical advisors to interpret and help the community understand technical information about their site. Interested community group should contact Dawn Taylor at (404) 562-8575 or taylor.dawn@epa.gov.

NEJAC Recommendation #5: **Increase the resources to environmental justice communities to conduct capacity building activities and to conduct workshops related to SRS.** Substantial

resources are provided to the CAB to conduct its operations and activities enabling them to provide recommendations of influence. Similar, yet different, levels of funding must be made available to environmental justice communities and organizations to conduct similar work as the CAB, based on the population for outreach. The environmental justice organization can provide more hands-on training from a peer level that leads to the development of the capacity to substantively participate in the National Environmental Policy Act (NEPA) and EIS processes and activities. Capacity building is essential in environmental justice communities, and this training occurs easily using community-based workshops that can be conducted on the weekends in order to include working people. The workshops help to build confidence and provide tools to assist residents in finding and using their voice to impact both policy and practice at the site.

Regional Response #5: In addition to the TAG mentioned in the previous response, EPA offers environmental justice grants through several programs. The Environmental Justice Cooperative Agreements Program provides financial assistance to eligible community-based organizations working on or planning to work on projects to address local environmental and/or public health concerns, using EPA's environmental justice collaborative problem-solving model. The Office of Environmental Justice Small Grant Program provides financial assistance to eligible community groups with projects that address environmental justice issues. To find out about these and other grants awarded by other EPA offices and regions, contact the EPA Region 4 Environmental Justice Coordinator, Cynthia Peurifoy, at 404-562-9649 or [peurifoy.cynthia@epa.gov](mailto:peurifoy.cynthia@epa.gov).

NEJAC Recommendation #6: **Provide resources for communities to undertake independent health studies that help rebuild faith in the government's role as protectors of the community's health.** Health is the primary concern next to cleanup in the environmental justice community. The health studies that have been conducted are few in number and have not answered the questions nor responded to the concerns of environmental justice stakeholders. Communities want to see comparative analysis done between site-conducted studies and independent studies to corroborate findings. Resources in the form of technical assistance grants can be provided to environmental justice communities to engage in a deliberative and collaborative process with the site on health studies.

Regional Response #6: Please see response to the previous recommendation (#5) regarding resources available to community groups. EPA Headquarters will assure that ATSDR is aware of this recommendation.

NEJAC Recommendation #7: **Explain and highlight the role of EPA Headquarters and EPA Regions.** The environmental justice communities do not understand the role of EPA at federal facilities in general, and SRS in particular. There is a critical need for EPA representatives to establish a relationship with the environmental justice communities impacted by the activities at SRS. Community workshops conducted by CFEJ and other organizations include staff from SRS/DOE/WSRC. EPA is visibly absent. This absence/lack of contact has created an incomplete picture for stakeholders who are the significant players in the site cleanup. Questions often arise about compliance and enforcement, but they are responded to by an entity other than EPA. The EPA Headquarters and EPA Region 4 offices that relate to federal facilities must be proactive in

ensuring public participation and addressing environmental justice concerns within their authority.

Regional Response #7: EPA Region 4 has regularly attended and participated in community workshops conducted by CFEJ and other community groups. Specifically, at CFEJ's Bi-State Conference in March 2004 and March 2005, EPA Region 4 gave a presentation about the role of EPA Region 4 Federal Facilities Branch at SRS. Regional representatives will continue to attend and participate in community workshops and try to more clearly define and communicate the roles and responsibilities of EPA, within the scope of the FFA, at SRS.

EPA will continue to work with DOE and SCDHEC to seek community involvement and public participation. EPA will actively seek opportunities to enhance the public involvement process and reach out to the community through EPA's environmental justice contacts and community involvement coordinators.

EPA will prepare a handout for the public that lays out the roles and responsibilities of the FFA parties for this NPL site, and include a brief verbal summary during appropriate presentations to the public.

NEJAC Recommendation #8: **Work with communities to identify and prioritize issues of concern to be addressed by DOE and SRS.** Collaborative efforts to address issues of concern of the environmental justice communities related to cleanup and health should be a priority of the site. Mechanisms to identify and prioritize concerns must be expanded and improved. Annual sessions can be held to dialogue with community leaders in setting the agenda of engagement for the upcoming year depending on the cleanup schedule and other site activities. Environmental justice communities are looking for more viable ways to get their voice heard and honored by DOE and SRS.

Regional Response #8: EPA Region 4 agrees that mechanisms to identify and prioritize concerns must be expanded and improved. EPA has recommended to and encourages DOE and SRS to conduct annual sessions to dialogue with community leaders in setting the agenda of engagement for the upcoming year depending on the cleanup schedule and other site activities. As a support agency, EPA will continue to encourage and facilitate such collaboration.

NEJAC Recommendation #9: **Collaborate with environmental justice communities on the best ways to address health concerns.** The concern related to health impacts continues to be a priority issue. Environmental justice communities want to know about past and potential health impacts. A strategy should be developed to determine how to address health issues, especially since the resources made available to CFEJ preclude them from addressing health-related questions. Not having a formal method to address the health factor contributes to the growing mistrust of the site and DOE. The communities are seeking ways to have at least an initial dialogue. A failed collaboration with ATSDR created frustration in environmental justice communities about who would examine their concerns and questions related to health. The communities recommend that DOE/SRS work with the environmental justice communities on creating a community health agenda.

Regional Response #9: EPA Headquarters will assure that ATSDR is aware of this recommendation.

NEJAC Recommendation #10: **Translate cleanup activities, cost, and technology to basic language and use the environmental justice community's approaches to the dissemination of the information.** Publish in a creative format using laypeople's terms, and include an acronym and definitions sheet, a summary of cleanup activities, the technology to be used, and the cost of cleanup. Work with leaders of environmental justice communities to identify the best and most effective venues to get the information to the people. Local churches, the National Association for the Advancement of Colored People (NAACP) chapters, and environmental justice groups should be provided resources to assist in this process. Public participation is greatly improved when people understand the basics of what is transpiring. The community has a right to know, and that right is guaranteed under law. Scientific and technical documents must be translated into a language that assists people in providing meaningful input and advice.

Regional Response #10: As previously stated in the response to recommendation #4, the nature of the cleanup activities being conducted is very technical. In communicating about such projects, the difficulty is always in striking a balance between enough technical information to provide a working understanding and providing it in layman's terms. CFEJ has been identified as an environmental organization that provides translation and interpretation of site data and documents. EPA has recommended and encouraged DOE to develop a collaborative effort between the site, environmental justice communities, and CFEJ to institutionalize new and creative ways of providing information to these groups of stakeholders. This will assist in building positive partnerships and ultimately improved relationships. In addition, Technical Assistance Grants (TAG) are available from EPA. A TAG provides money for activities that help the community participate in decision making at eligible Superfund sites. An initial grant up to \$50,000 is available to qualified community groups so they can contract with independent technical advisors to interpret and help the community understand technical information about their site. Interested community group should contact Dawn Taylor at (404) 562-8575 or [taylor.dawn@epa.gov](mailto:taylor.dawn@epa.gov).

Site: Defense Depot, Memphis, Tennessee

Office Preparing Response: U.S. EPA Region 4, Waste Management Division, Federal Facilities Branch

Regional Contact: Turpin Ballard, 404-562-8533, [ballard.turpin@epa.gov](mailto:ballard.turpin@epa.gov)

NEJAC Recommendation #1: When conducting public information sessions or meetings, it is imperative that staff from all appropriate agencies be present to respond to questions from the community. This has not always occurred. No one agency can address all questions.

Regional Response #1: At community meetings and Restoration Advisory board (RAB) meetings, the BRAC Cleanup Team (BCT) tries to have expertise available to address issues we anticipate may arise, based on the subjects in the meeting agenda. This has included representatives from EPA, TDEC, ATSDR (off and on), DLA, USACE, A&E contractor, RAC contractor, and Community Relations contractor. RAB membership includes County Health and PWS representatives. It is a rare occasion when we can't answer a question, in which case it becomes an action item to report back with either an answer or a resource for the questioner. The answer may not always satisfy the concerns, but we strive to be complete and accurate. The BCT has agreed that we need to meet with the local government members on the RAB to get them more involved in responding to these questions during the meetings, as appropriate.

NEJAC Recommendation #2: Greater opportunities and allocation of resources are needed for educating community members about technical issues, regulatory standards, and compliance details involved in the cleanup process. Information needs to be in clear, simple, laymen's terms, not in complicated technical language, to greatly assist community residents in making meaningful comments and to increase their level of participation. The RAB received a Technical Assistance for Public Participation (TAPP) grant once, but more resources are needed to reassure the community and help them understand the on-going cleanup process.

Regional Response #2: EPA, DLA, and TDEC have sponsored multiple workshops and availability sessions by way of outreach and education. In recent years, however, the project team has shifted focus from such efforts due in large part to lack of participation by the community, as documented in Number 8 on Page A-31 of the NEJAC report. EPA and the BCT recognize the need for information about the site to be presented in a manner that will be understood by community residents and will continue to work towards that end. There is a wide range of experience and educational background in the community, which is reflected in the makeup of the RAB. This makes it difficult to strike a balance at public meetings between offering enough technical information to provide a working understanding, and providing information in layman's terms. In the past, DLA has typically leaned toward over-simplifying its public presentations. As a result of recent risk communication training attended by the BCT and Depot contractors, it was resolved to try and explain technical issues, and especially answer questions, on both levels where possible and appropriate.

In addition, the same questions are frequently asked at multiple meetings. TDEC and EPA have recommended several times that DLA have standard visual aids available to illustrate the answers to the repetitive questions. The BCT is now working on developing poster boards to

have at all meetings to aid in explaining technical issues and answering frequently asked questions. At least annually, there is a presentation to the RAB (always open to the public) about the site status, the CERCLA process, where projects are in the process, etc. Now that the projects are in remedial design/remedial action, we have an increasing number of public meetings to present the remedial designs and next steps.

With regard to making other resources available, EPA has solicited interest on several occasions in a TAG grant. To date EPA has received no applications. The RAB did not move to re-apply for the additional 3 years worth of available funding under the referenced TAPP grant.

Also, EPA offers environmental justice grants through several programs. The Environmental Justice Cooperative Agreements Program provides financial assistance to eligible community-based organizations working on or planning to work on projects to address local environmental and/or public health concerns, using EPA's environmental justice collaborative problem-solving model. The Office of Environmental Justice Small Grant Program provides financial assistance to eligible community groups with projects that address environmental justice issues. To find out about these and other grants awarded by other EPA offices and regions, contact the EPA Region 4 Environmental Justice Coordinator, Cynthia Peurifoy, at 404-562-9649 or [peurifoy.cynthia@epa.gov](mailto:peurifoy.cynthia@epa.gov).

NEJAC Recommendation #3: The lack of information about environmental justice issues among agency representatives and contractors calls for a greater effort to train representatives who will be making contact or working closely with the community. Environmental justice and diversity training is greatly needed to ensure a greater degree of cultural sensitivity and better communication and interaction.

Regional Response #3: BCT principals (agency representatives) have received EJ/Diversity/Risk Communication training through their respective agencies. The BCT recently completed refresher training specific to site issues, including Depot contractor personnel. Additional, in-depth training is planned in FY 06.

NEJAC Recommendation #4: It is important to establish a clear line of responsibility and accountability between the Depot and the other official agencies to strengthen the effectiveness of communication with the community. Having multiple agencies in charge gives the community the feeling they are being “given the runaround” as they seek information.

Regional Response #4: EPA will work with DLA to prepare a handout for the communities which lays out roles and responsibilities of the FFA Parties for this NPL site, and include a brief verbal summary during appropriate presentations to the public. There are multiple agencies in charge of various aspects of the program, but we can try to be clearer up front about who is in charge of what, and the difference between regulatory oversight and support agency activities. This handout will be available at all community meetings and EPA will recommend to DLA that it be included in its Depot restoration newsletter, which is sent to approximately 5,000 addressees.

NEJAC Recommendation #5: EPA should recommend to ATSDR that it seek new and improved methods for assessing exposure in communities that have the probability of past exposure to toxic substances.

Regional Response #5: EPA Headquarters will assure that ATSDR is aware of this recommendation.

NEJAC Recommendation #6: A Working Group should be formed to examine the health concerns of former workers and community members and to establish a health center directly in the community.

Regional Response #6: The most frequently articulated health issues and concerns relate largely to past occupational exposure of Depot workers, many of whom are community members. To a somewhat lesser degree, they also relate to past potential exposure to contamination that may have migrated from the depot via such pathways as windborne or stormwater runoff. Residual soil contamination data from the latter pathway indicate risk from Depot-related releases is within the risk range. ATSDR conducted an epidemiological cancer cluster study as part of a revised health assessment that was published in 2000. The study found no significant increase in cancer incidence in the immediate areas around the Depot as compared to the general population of Memphis. The report was not well received by the community. The issue of injury from past exposure is largely outside of the scope of the Superfund program. However, the RAB and the Superfund public involvement process provide the only re-occurring forum about the Depot where the residents can raise their concerns to local, State, and Federal government representatives.

EPA Headquarters will assure that ATSDR is aware of this recommendation.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 6**  
**1445 Ross Avenue, Suite 1200**  
**Dallas, Texas 75202-2733**

**August 8, 2005**

**MEMORANDUM**

**SUBJECT:** Region 6 Response for Developing a Site Specific Response Strategy to the National Environmental Justice Advisory Committee Report on Federal Facilities

**FROM:** /s/ Carl E. Edlund, P.E., Director  
Multimedia Planning and Permitting Division (6PD)

**TO:** James Woolford, Director (5106G)  
Federal Facilities Restoration and Reuse Office (FFRRO)

This memo is in response to your June 30, 2005, memorandum requesting the Region 6 strategy for responding to Region-specific recommendations in the National Environmental Justice Advisory Council (NEJAC) Report on Federal Facilities. That Report was developed by NEJAC to present the findings of its Federal Facilities Working Group (FFWG). The FFWG identified and evaluated key issues of concern to environmental justice communities regarding activities and operations at and around federal facilities. The FFWG also formulated a set of recommendations to address the concerns raised in the Report. The Report, including its recommendations, reflects the views of the members of NEJAC and the FFWG, who represent a diverse group of stakeholders. However, the report was not reviewed nor approved by EPA, so its contents do not represent EPA policy or guidance. This is a crucial point worth noting since several of the recommendations in the NEJAC Report are inconsistent with EPA guidance and policy.

The Region 6 strategy for responses to the recommendations offered for both the former Kelly Air Force Base (AFB) and Fort Wingate are summarized in the requested tabular format attached to this memo.

As always, should you have any questions, please contact me at 214-665-7200, or ask your staff to contact Greg Lyssy at 214-665-8317 for Kelly AFB questions, or Chuck Hendrickson at 214-665-2196 for Fort Wingate questions.

**Attachments**

**cc:** Josh Barber, FFRRO  
Adam Antwine, AFRPA  
Norma Landez, AFRPA  
Vanessa Musgrave, AFRPA  
Larry Fisher, DOD  
Mark Weegar, TCEQ  
James Bearzi, NMED  
Laurie King, EPA Region 6



**Site:** Kelly AFB

**Office Preparing Response:** Region 6 (6PD-F)

**Regional Contacts:** Laurie King (214-665-6785) Greg Lyssy (214-665-8317), Gary Miller (214-665-8306)

**NEJAC Recommendation:** Air Force should explore ways to “compensate” the community as a whole for the perceived injury or insult resulting from decades of environmental mismanagement, whether or not studies prove that public health or property values have been substantially undermined by Kelly’s pollution. Since current statutes might not support such a response, all parties may need to work with the local Congressional delegation to develop enabling legislation.

**Regional Response:** The NEJAC report request for compensation for “perceived injury or insult” is contradictory to EPA’s current authority policy and guidance. Numerous studies conducted by ATSDR, the Texas Department of State Health Services, the San Antonio Metropolitan Health District, and a consortium of public and private groups, including the Amyotrophic Lateral Sclerosis Association, on the Kelly community show there is no definable link between former Kelly operations to a specific illness or disease. Information from current on-going studies, as conducted by the Public Center for Environmental Health, was presented by Dr. Fernando A. Guerra, M.D. to the Restoration Advisory Board (RAB) during the July 19, 2005, RAB meeting.

The Bexar County Appraisal District (BAD) analyzed trends in property values in neighborhoods adjacent to or associated with the former Kelly AFB and over the shallow groundwater plume. BAD has not shown a demonstrable negative market impact on property values as a result of the groundwater contamination.

The NEJAC report is correct in stating that current statutes do not support compensation for perceived injury or illness. The report recommends that parties may need to work with the local Congressional delegation to develop enabling legislation. This is an option that community groups may choose to pursue; however, lobbying Congress is outside the legally authorized role of the federal and regulatory agencies involved in the restoration of the former Kelly AFB.

**NEJAC Recommendation:** Either through listing Kelly on the National Priorities List or some other mechanisms, TAG-style technical assistance should be made available to community activists to develop their own technical strategy for Kelly cleanup, remedy review, and long-term management. This would supplement the TAPP funding that is supplied to the Restoration Advisory Board.

**Regional Response:** TAG grants do not provide funding for communities to develop alternative strategies nor is the issuance of TAG grants a basis for placement on the National Priorities List. AFRPA, with oversight and approval of TCEQ and EPA, is responsible for developing the strategy for remedial actions at the former Kelly AFB and then implementing the approved remedial actions. This remedial process follows the requirements set forth in the TCEQ RCRA Permit. By law, this responsibility cannot be delegated to the public. The technical strategy utilized at the former Kelly AFB has been developed with many opportunities for public input, as required by regulation, as well as earlier opportunities prior to submittal by the Air Force of proposed strategies. This was conducted not only through the RAB but other outreach activities. AFRPA is in the final stages of proposing the final corrective action for off-site groundwater contamination and on-site soil and groundwater contamination as part of the corrective action process. The community, through the TCEQ’s RCRA corrective action permitting program and the RAB process, provides input into this remedial process. AFRPA, via the Technical Assistance for Public Participation (TAPP), has provided funding to the RAB to hire independent technical assistance to review and provide comments on RCRA Facility Investigations (RFIs), Corrective Measures Studies (CMSs), and Corrective Measures Implementation work plans (CMI), along with the review of the ATSDR reports. The State of Texas and EPA have determined that the cleanup of the former Kelly AFB continues to be appropriately addressed through the TCEQ RCRA permitting program. An additional mechanism available to the community includes Technical Outreach Services for Communities (TOSC) which provides assistance to communities affected by environmental contamination. TOSC aims to empower communities to participate substantively in the decision-making process regarding their hazardous substance problems. For more information concerning TOSC, please

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go to the website located at: <http://www.toscprogram.org/>

With regard to the comment concerning listing Kelly on the National Priorities List and TAG-style technical assistance being made available to community activists, 10 USC 2705(e) Technical Assistance, provides the mechanism whereby the Department of Defense (DoD) provides for private sector technical assistance. The public has access to funds to hire third party technical assistance through the TAPP program in accordance with 10 USC Section 2705(e). This provides the community the opportunity to review technical documents produced in the course of the cleanup program and provide more informed comments on them to the DoD and the regulatory agencies. To date, the Kelly RAB has spent approximately \$91,000 of the \$100,000 allotted to them through the TAPP program. It is our understanding that some of those projects are on-going and some funds are still available to continue through the final stages of this program as mentioned above.

**NEJAC Recommendation:** Government agencies at Kelly—not just the Air Force—should build on existing efforts to provide opportunities for community members to be heard. Project Regeneration, an interagency supported initiative designed to “level the playing field,” is a good start.

**Regional Response:** We concur that the Kelly Area Collaboration (KAC), (formerly known as Project ReGeneration) is a good start to foster communication and “level the playing field”. The KAC participants include community groups and representatives from federal, state, and local agencies who are planning several “roundtable” or forum meetings in upcoming months on environmental cleanup, health and economic revitalization. The KAC has discussed various ways to involve many other government and quasi-government agencies who have an important impact on the community. These discussions will be carried through in the planning for this project.

The environmental restoration of the former Kelly AFB is being conducted pursuant to the State of Texas’s authorized RCRA corrective action program. Texas House Bill (HB) 801 (76<sup>th</sup> Legislature, 1999) established the statutory procedures for public participation in certain environmental permitting procedures. The Texas Legislature’s requirements related to opportunities for public comment are codified in Subchapter M entitled “Environmental Permitting Procedures” in the Texas Water Code. TCEQ staff have made several presentations concerning the public comment process to the Kelly RAB. EPA and TCEQ have tried on several occasions to make it clear to the RAB and to the community groups that Kelly’s final remedy will be implemented through the RCRA permit process as soon as this Fall. The community’s opportunity to make constructive technical comments for TCEQ to consider need to be made through the permit process. In an effort to expand the community’s knowledge of the public comment process, Region 6 confirmed with Technical Outreach Services for Communities (TOSC) representatives that they would be available to conduct a workshop on the RCRA permitting process for the Kelly community in late Summer or early Fall. All TOSC requires is that the request for their services comes through a community group or representative. The Region provided this information to community representatives who indicated it would be beneficial.

**NEJAC Recommendation:** Appropriate government agencies should conduct, in a timely manner, a thorough cleanup of contamination in the community that is caused by Kelly Air Force Base and poses a significant threat to human health and/or the environment.

**Regional Response:** This action is being taken. There are seventeen remediation systems in place to remediate on-base soil and ground water contamination and off-base ground water contamination. This is being conducted with the oversight and approval of both Federal and State regulatory agencies as the cleanup is being addressed under the TCEQ’s RCRA permit and corrective action program. The final cleanup plans for

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the off-site groundwater contamination should be submitted to the TCEQ for review and approval, including public comment by the end of September, 2005.

In addition, the Agency for Toxic Substances and Disease Registry (ATSDR) has conducted thirteen consultations and public health assessments for the Kelly community since 1990 as well as a literature search on amyotrophic lateral sclerosis (ALS) or Lou Gehrig's Disease. ATSDR evaluated possible pathways (air, groundwater, surface water, drinking water and soil) of exposure through which the community might have contact with contamination from operations from the former base. ATSDR concluded that the community is not currently exposed to levels of contaminants from Kelly AFB that would cause people to become sick, or that there is no apparent health hazard. Health studies by other health agencies do not, at this time, demonstrate that a significant threat is posed to human health or the environment.

**NEJAC Recommendation:** Greater opportunities and allocation of resources are needed to educate community members about technical issues, regulatory standards and compliance details involved in cleanup process. Information needs to be in simple, layman's terms, not in complicated technical language, to greatly assist community residents in making meaningful comments and increase their level of participation. It is important to clarify the responsibility and accountability between the Air Force and governmental agencies with the community.

**Regional Response:** These opportunities are being provided. As stated previously, Region 6 has provided the information necessary for the local community groups to obtain TOSC services to conduct a training workshop on the RCRA permitting process.

TAPP funding has been provided for the specific purpose of providing technical support to the community in reviewing and understanding the technical reports generated during the remedial process. EPA Region 6 will continue to pursue avenues and opportunities that allow for community involvement in the corrective action process. However, it should be noted that the investigatory and planning stages for remedial actions are winding down. As stated previously, the community will have the opportunity to comment on the proposed remedial actions via the TCEQ's public participation process as it relates to the Kelly RCRA permit.

**NEJAC Recommendation:** Federal agencies should recognize that even though the RAB is the official mechanism through which stakeholders provide input and advice to DOD, there needs to be more meaningful ways of participation, such as community based initiatives with institutional and community groups, as recommended in the 1996 Final Report of the Federal Facilities Environmental Restoration Dialogue Committee.

**Regional Response:** The agencies have met with the community groups on numerous occasions outside the RAB process. For example, the Southwest Workers Union (SWU) recently met with EPA Region 6's Deputy Regional Administrator in Dallas to discuss general environmental justice concerns. Follow up staff meetings were arranged in San Antonio with the local representatives of the SWU to discuss issues related to the former Kelly AFB. The agencies will continue to work with the affected communities using a variety of outreach tools, including the TOSC training, speaking to individual community groups, and the KAC.

**Site:** Fort Wingate Depot, NM

**Office Preparing Response:** Region 6 (6PD-F)

**Regional Contacts:** Chuck Hendrickson (214-665-2196), Laurie King (214-665-6785)

**NEJAC Recommendation:** Conduct formal training for all parties in each party's cultures and processes. By establishing a more formal training program, to be conducted periodically throughout the process, each key individual involved in the process can be educated about the cultural issues and technical and scientific practices and terms they will encounter through the process. The increased awareness of cultural differences will lead the project team to better outcomes. For example, the Army may recognize that traditional institutional controls and deed restrictions will not work and select more appropriate remedies. The Navajo and Zuni representatives in the process may learn about the environmental statutes that will be applied and consequently increase their effectiveness in providing input and influencing the restoration and transfer process.

**Regional Response:** New Mexico Environment Department's (NMED) draft RCRA permit requires the Army to develop a Community Relations Plan that includes consultation with key stakeholders throughout the closure and corrective action process. The key stakeholders include The Army, NMED, the Navajo Nation, Pueblo of Zuni and the Department of Interior/Bureau of Land Management. EPA will work with NMED to ensure that formal training occurs if it is requested.

**NEJAC Recommendation:** Publish and gain commitment from DoD and other parties to a firm restoration and transfer schedule. By having a firm schedule that is adhered to, the cleanup of the site becomes a higher priority among all stakeholders and keeps people's interest and involvement. Ultimately, a firm schedule should result in a more fair and just outcome due to the more effective involvement of all parties.

**Regional Response:** NMED has established a firm cleanup schedule in the draft RCRA permit, which is expected to be final and in effect early in 2006. On September 14, 2004, NMED issued a draft permit for public comment. NMED held a series of meetings in Spring 2005 with all parties who had commented on the draft which resulted in substantial resolution of issues raised. NMED expects to public notice the revised draft permit in August 2005.

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**NEJAC Recommendation:** Better dissemination of information. The site team would like to emphasize that the Navajo and Zuni are still very much an oral culture, and while an elder may be able to speak English, he or she sometimes cannot read it. The site team was clearly told by the Navajo and Zuni that they prefer having all important information and schedules disseminated via radio, since radio airwaves reach those living on rural sites on the reservation and can be broadcast in English, Navajo, or Zuni. This is a recommendation that may apply to a number of sites around the nation that concern American Indian stakeholders, as radio is the medium of choice for dissemination of information on almost all reservations. In addition, DoD should publish simple, one- or two-page fact sheets on a variety of topics, such as the current status, schedule, and specific projects related to the restoration and transfer of Fort Wingate. These fact sheets should be published monthly, include many illustrations to account for people with limited reading skills, be written in plain language, and be published in the languages of all stakeholders. The fact sheets should be widely disseminated to interested parties. They should be posted in community gathering areas (such as the Navajo chapter houses and Zuni villages) and published in local papers. The fact sheets are not meant to replace the RAB or the BCT but to better inform the people about the current project status. Increased dissemination of this kind encourages increased public participation in the restoration process.

**Regional Response:** NMED has made every effort to address the dissemination of information issues identified above through the RCRA permit process. When NMED released the draft permit for public comment, the public notice was written in English, Navajo, Spanish and Zuni. NMED held a series of meetings in Spring 2005 with all parties who had commented on the draft which included the Army, EPA, the Navajo Nation, Pueblo of Zuni and the Department of Interior/Bureau of Land Management. NMED's draft RCRA permit also requires the Army to consult with the Pueblo of Zuni and the Navajo Nation when developing a Community Relations Plan which will be in place throughout the closure and corrective action process. EPA will continue to work with NMED and DOD to support these recommendations on dissemination of information.

**NEJAC Recommendation:** Continue and broaden the involvement of key parties in the BCT. One of the successes of this site is the involvement of representatives from the Navajo Nation and Zuni Pueblo on the BCT. It also has served as a double-edged sword since the involvement has diminished RAB participation due to the perception that appointed representatives are doing a good job, so the public does not need to participate. DoD must make a greater effort to monitor participation in the RAB after bringing key stakeholders onto a BCT, and take appropriate actions to encourage higher levels of RAB involvement.

**Regional Response:** Through the Community Relations Plan and the tribal consultation provisions throughout the draft NMED permit, involvement of key stakeholders (the Navajo, Zuni, and DOI/BLM) in the cleanup process should continue to be strong. The BCT (BRAC Cleanup Team) process will likely end when the RCRA permit provisions are in final and in effect in early 2006.

**NEJAC Recommendation:** If possible, ensure the BRAC Environmental Coordinator (BEC) is local. Wherever possible, the installation should have a project team consisting of members who are from the local area. This will aid in understanding the culture, nuances, and concerns of the local community. It should also help to avoid competing work assignments that might lower the priority for work on the site (thus voiding the out-of-

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sight, out-of-mind syndrome).

**Regional Response:** The Army has posted a job announcement (closing date July 22, 2005) for a BEC to be located at Fort Wingate.

## Regional Response Form for NEJAC Recommendations

**Site:** Hanford

**Office Preparing Response:** Region 10, Office of Environmental Cleanup, Hanford Project Office

**Regional Contact:** Dennis Faulk

**NEJAC Recommendation:** [Copy and paste bolded item from NEJAC Report]

**#1 Require mandatory cultural diversity and sensitivity training for all project and field staff of DOE, EPA and Washington State Department of Ecology.**

**Regional Response:** [Include potential resource requirements, time frames, responsible party (lead), and who supports. If this is a recommendation not applicable to the site or if the region believes it does not require a site-specific response, please briefly explain why.]

**EPA and our cleanup partners at DOE and the State of Washington have agreed to develop a contract with the Confederated Tribes of the Umatilla Indian Reservation to set up a cultural awareness class for our project managers. Several EPA project managers attended this training a few years ago and found it to be very educational and time well spent. It is anticipated that this training will be held in spring 2006 on the Umatilla Indian Reservation. In addition, the region surrounding Hanford is comprised of a large Hispanic population, particularly in the Yakima Valley, and there is the potential to develop cultural diversity training with local resources. The EPA Hanford Project Office has scheduled an environmental justice training for November 8, 2005, for Tri-Party Agreement personnel.**

**NEJAC Recommendation:**

**#2 Continue to offer financial resources to the American Indian tribes either through grants, cooperative Agreements or subcontracting mechanisms.**

**Regional Response:**

**EPA contacted the Indian Affairs program at DOE-Richland and was informed that the DOE planned to continue to fund the tribal governments to allow the tribes to participate in the cleanup program. In addition, a Hispanic member of our site advisory board, Martin Yanez, has been working to secure grants through EPA to enable the Hispanic community to become more engaged in Hanford cleanup.**

## **Regional Response Form for NEJAC Recommendations**

**NEJAC Recommendation:**

**#3 Do not impose term limits on HAB members.**

**Regional Response:**

**The issue of term limits for advisory board members is the responsibility of the DOE since the Board is chartered under DOE. Board members are opposed to term limits, and discussion between DOE and the Board regarding term limits has resulted in the DOE deciding not to pursue the issue at this time.**

**NEJAC Recommendation:**

**#4 To ensure the HAB reflects diverse interests and ethnic groups, new members should be recruited to join and existing members should be encouraged to remain on the HAB, particularly members from minority or environmental justice communities.**

**Regional Response:**

**This recommendation applies to the Hanford Site citizens' advisory board. In part, based on interactions between Board members and the NEJAC subcommittee, the Board specifically targeted an under-represented population by holding a meeting and open house in Yakima, Washington. Yakima has a large Hispanic population and borders the Yakama Nation Reservation. Extensive outreach efforts included visiting local Rotary Clubs, discussions on the Yakima Valley's Spanish language radio station, as well as an open house at one of the inner-city high schools. An information sheet was developed by the Tri-Parties in both English and Spanish to assist the Board in this outreach effort. Although this effort was not designed to recruit new members, the hope is that by generating interest in other communities, more people will become involved in Hanford cleanup. As openings become available, the Board and the agencies will continue efforts to recruit members with diverse backgrounds.**



## **Regional Response Form for NEJAC Recommendations**

**NEJAC Recommendation:**

**#5 Perform more targeted outreach activities in minority and environmental justice communities and continue to conduct these activities.**

**Regional Response:**

**As outlined in the previous response, outreach efforts to environmental justice communities are ongoing and the EPA and the State of Washington are working to bring together a round table of local Hispanic leaders to help gauge interest and avenues available to reach environmental justice communities.**

**NEJAC Recommendation:**

**#6 Establish a formal internship program for minority, low-income, community high-school and college-level students to work in office of DOE, EPA, or the Washington Department of Ecology.**

**Regional Response:**

**Each of the agencies has internship programs that are available to all, including minority and low-income populations. In the summer of 2006, the EPA Hanford Project Office will contact local colleges and universities and offer short-term internships to minority students. Recently, the job announcements for two positions open in the Hanford Project Office were widely distributed to local tribes (Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, Nez Perce Tribe, and the Wanapum People). Region 10's Office of Ecosystems, Tribal, and Public Affairs was requested to contact tribes throughout the region to identify candidates; however no tribal applications were received. Mailings were sent to universities identified as likely to have Hispanic or other minority candidates qualified for the position. The Society of Hispanic Professional Engineers and the National Society of Black Engineers were also contacted. These recruiting efforts resulted in hiring a person of Latino heritage.**