Table of Contents

[TOC \o "1-1" \h \z \u]

APPENDICES[1]

Appendix 1 Abbreviations and Acronyms

Appendix 2 Glossary

Appendix 3 Agency Contacts

Appendix 4 Elected Officials (federal, state, county, local)

Appendix 5 Potentially Responsible Parties

Appendix 6 Stakeholder Groups

Appendix 7 Information Repositories

Appendix 8 Media List

Appendix 9 Community Interview Questions

Appendix 10 Fact Sheets

Appendix 11 Legal Authorities

[1] Not included in this submittal. Appendices will be completed after main text is reviewed by USACE and EPA.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

[TOC \h \z \t "Figure" \c]**List of Figures**[2]**[TOC \h \z \t "Figure" \c]**

Figure #	Title of Figure
Figure 1:	Location Map and Surrounding Community
Figure 2:	Study Area Map for Riverside Industrial Park Superfund Site
Figure 3:	Steps in the Superfund Process
Figure 4:	Diversity within the Riverside Industrial Park Superfund Site

[2] Not included in this submittal. Figures will be completed after main text is reviewed by USACE and EPA.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

List of Tables[3]

Table #	Title of Table
Table 1:	Project Activities
Table 2:	Demographic Summary Statistics
Table 3:	Key Tools for Communication

[3] Not included in this submittal. Tables will be completed after main text is reviewed by USACE and EPA.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

INTRODUCTION

This Community Involvement Plan (CIP) for the Riverside Industrial Park Superfund site (Riverside; the site) was developed to facilitate communication between the United States Environmental Protection Agency (EPA) and the communities affected by and interested in Riverside, as well as to encourage community involvement. The CIP will serve as a roadmap for EPA in providing opportunities to share information with the public and to receive input during the cleanup of Riverside. The CIP can also be used by the community to share information with EPA and obtain information about the Riverside cleanup. The CIP is an evolving document and will be updated or revised, as needed, to ensure that opportunities for meaningful public participation continue throughout the cleanup.

As EPA works on the details of the design and implementation of the cleanup, the agency is committed to involving the public and keeping the community informed about cleanup activities and how these activities may impact them. In keeping with that commitment, this CIP has been developed to facilitate and encourage dialogue between EPA and the neighborhood and its residents who live near or are affected by Riverside, as well as to encourage community involvement in site activities.

This CIP contains the following five sections:

1. Overview
2. Project Background
3. Community Involvement and Feedback
4. Community Profile
5. Community Involvement Action Plan

The attached appendices are designed to serve as a resource guide for both EPA and the community. The main text of the CIP and appendices may be read independently of each other. Acronyms are spelled out upon first reference, and a full list of acronyms and abbreviations is provided in **Appendix 1**. Other appendices include EPA and other federal and state agency contacts, local municipal contacts, where to find additional documents, a glossary of terms, and other relevant project background information. Bolded terms that appear in the CIP may appear in fact sheets or the Proposed Plan and are defined in a glossary in **Appendix 2**.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

1.0 OVERVIEW

The following section describes the purpose and scope of the CIP, as well as applicable legal authorities.

1.1 PURPOSE OF THE COMMUNITY INVOLVEMENT PLAN

The CIP is the foundation for EPA's Superfund Community Involvement Program. The goals of the CIP are to provide opportunities for the public to become actively involved in the cleanup, to educate the community on the Superfund process, to gather input from the community, to consider community issues and concerns, and to inform the public of progress. EPA will achieve these goals using a variety of tools and activities (described in Section 5). Not all of the tools and activities may necessarily be implemented. Rather, EPA will periodically review, select, and prioritize which tools and activities to implement based on input from the community and in consideration of project management and community factors.

The purpose of the CIP is to outline actions and activities that EPA may undertake to encourage meaningful public engagement. It is also designed to assist the communities and other stakeholders to become more informed and involved in the Riverside cleanup (refer to **Appendix 6** for list of stakeholder groups).

1.2 SCOPE OF THE COMMUNITY INVOLVEMENT PLAN

This plan offers options for community involvement and outreach, rather than a prescriptive approach. The suggested outreach activities and tools in the following pages are flexible in nature and were designed to appeal to multiple audiences. EPA recognizes that not all outreach activities and tools are suited for all groups, and EPA knows that when it comes to community involvement, there is "no one size fits all." To produce a CIP that truly works for the affected community, a clear and sensitive profile of the community must be generated by using community interviews to speak with the public and solicit feedback from the community (refer to Section 3.0).

Where possible, the CIP lays out a probable sequence of cleanup activities. EPA does not currently have the information necessary to identify the precise timing of all activities and opportunities for community involvement and outreach. Therefore, this CIP will remain a living document that will be reviewed and updated as needed. Specific timeline information on the major cleanup project documents, decisions, and activities will be provided to the public through fact sheets, EPA website updates, and electronic mailing lists.

1.3 AGENCY PARTNERSHIPS AND LEGAL AUTHORITIES

The Remedial Investigation/Feasibility Study (RI/FS) for Riverside, as well as the remedial design (RD) and remedial action (RA), are being administered by EPA with authority under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended, commonly known as "Superfund." These regulations provide EPA with the ability to investigate, rank, and conduct the cleanup of inactive hazardous waste sites on the National Priorities List (NPL). The NPL is a list of

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

hazardous waste sites that meets the federal criteria for inclusion under Superfund. Superfund gives EPA the authority to require those parties responsible for creating the hazardous waste sites to perform the cleanup or to reimburse the government, if EPA performs the cleanup. EPA requires potentially responsible parties (PRP) to clean up hazardous waste sites through administrative orders, consent decrees, and other legal settlements. EPA is authorized to enforce Superfund in all 50 states and United States territories.

The Superfund site identification, monitoring, and response activities are coordinated with state, tribal, and territorial environmental protection and waste management agencies. On Riverside, EPA is working closely with the United States Army Corps of Engineers (USACE) and the New Jersey Department of Environmental Protection (NJDEP) to ensure that entities with shared jurisdictions are kept informed of EPA activities. Please refer to **Appendix 11** for a more detailed discussion of legal authorities.

2.0 PROJECT BACKGROUND

The following section describes Riverside's site history and provides a summary of Superfund activities conducted to date.

2.1 DESCRIPTION OF THE RIVERSIDE INDUSTRIAL PARK SUPERFUND SITE

Riverside is a 7.6-acre, active industrial complex located in the North Ward community of the City of Newark, New Jersey, along the banks of the Passaic River (refer to **Figure 1** for a map of Riverside's location and the surrounding community). The majority of the site was reclaimed from the Passaic River with imported fill to support commercial and industrial activity. Filling primarily occurred over a 20-year period in the late 1800s and early 1900s. The origin of the fill material is unknown, but it consists mainly of sands, silts, gravel, and man-made materials, such as brick, glass, concrete block, wood, and cinders. The fill material may have been originally contaminated prior to placement and/or further impacted by accidental spills, illegal dumping, improper handling of raw materials, and improper waste handling/disposal from subsequent industrial and commercial activities conducted at Riverside.

Both Riverside Avenue and McCarter Highway border Riverside to the west, along with a segment of railroad track adjacent to McCarter Highway (refer to **Figure 2** for a map of Riverside). Currently, the central and northern portions of Riverside contain active industrial/commercial businesses ~~operating in buildings formerly operated by PPG Industries, Inc. (PPG) for paint manufacturing~~, while the south side contains vacant buildings ~~(which are remnants of the former PPG operations)~~. The main entryway is through a vehicle access point on Riverside Avenue; however, pedestrian trespassing occurs regularly. Much of the surface area is covered by buildings or pavement. The Passaic River and its tidal mudflat border Riverside on the east side. Sections of steel, concrete, and wooden bulkhead provide a retaining wall along most of the site adjacent to the Passaic River; however, the bulkhead has fallen into disrepair in some locations and several sections have collapsed.

Commented [A1]: Buildings were owned/operated by a variety of entities.

Commented [A2]: Buildings were owned/operated by a variety of entities.

There are 14 buildings at Riverside that formerly supported PPG's operations. The building numbers that are shown on Figure 2 are associated with the former PPG building numbering system. Five buildings are currently vacant (Buildings #6, #7, #12, #15, and #17). At the time of EPA's Remedial Investigation (RI) in 2017, Buildings #1, #2, #3, #9, #10, #13, #14, and #16 had ongoing business operations, and a small garage building (Building #19) was used for storage by the occupant of Building #13. Former Buildings #4 and #5 have been partially demolished.

2.2 SITE HISTORY

Between 1902 and 1971, a paint plant operated at Riverside and manufactured paint, varnish, linseed oil, resin, and other coatings. The original paint plant was constructed in the early 1900s by the Patton Paint Company, which merged into the Paint and Varnish Division of Pittsburgh Plate Glass Company in 1920, which has been known as PPG since 1968. PPG mixed resins, non-chlorinated solvents, and metal pigments to produce paints. Varnishes were made from resins, oils, and non-chlorinated solvents.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

Following the ~~closure~~ cessation of PPG's ownership and operations at Riverside in 1971, the property was subdivided into 15 lots, and a wide variety of industrial and manufacturing companies have operated over the past 50 years at Riverside under various owners. Occupants and operations have included:

- Frey Industries, Inc./Jobar for warehousing, packaging, repackaging, and distribution of client-owned chemicals
- Baron Blakeslee, Inc. for product distribution, warehousing of a variety of chemical products, analysis of various chemical blends and waste samples, drum storage, and truck and tanker parking
- Universal International Industries for various manufacturing operations
- Samax Enterprises for chemical manufacturing
- HABA International, Inc./Davion Inc. for manufacturing nail polish remover and related products, and Acupak, Inc. for providing packaging services for HABA
- Roloc Film Processing for manufacturing foils utilized in various commercial products
- Gilbert Tire Corporation for storing used tires and wheel rims
- Chemical Compounds, Inc./Celcor Associates, LLC for manufacturing hair dyes and other personal hygiene products
- Teluca for packaging and distributing hair dyes, hair color, and related ingredients, hair dye research laboratory, offices, and warehousing
- Gloss Tex Industries, Inc. for manufacturing bulk nail enamel, lacquer, and related cosmetic products
- Ardmore, Inc. for manufacturing soaps and detergents, and storing their empty drums
- Monaco RR Construction Company for storing railroad rails, cross ties, and spikes
- Federal Refining Company for recycling metal
- Midwest Construction Company for storing and maintaining construction equipment and materials

Due to the presence of historic fill, accidental spills, illegal dumping, improper handling of raw materials, and/or improper waste disposal from historic and current operations, the soil and groundwater at Riverside are contaminated. Prior to the start of EPA's RI in 2017, at least seven lots at Riverside were subject to Industrial Site Recovery Act (ISRA) remediation cases under New Jersey environmental regulations. The ISRA investigations resulted in modified deed notices with engineering controls (such as pavement surface cover) being put in place on several lots. Groundwater Classification Exception Areas (CEAs) have also been established for several lots due to contamination in groundwater above the New Jersey standards. In addition, between 2011 and 2014, NJDEP and EPA worked cooperatively to remove tanks ~~(that were remnants of the former PPG paint manufacturing process)~~ from two buildings and to remove liquid sludge from the basement of Building #7~~13~~ and prevent discharging to the river. The liquid sludge was generated during the operations of Frey Industries, Inc. and placed in the basement as a solid waste management unit.

Commented [A3]: Tanks were last used by Frey

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

EPA conducted the RI and developed risk assessments to evaluate the nature and extent of contamination across Riverside (without regard to lot boundaries) and to evaluate whether the soil, soil gas, and/or groundwater present a potential for unacceptable human health and ecological risks. Following the RI, EPA determined that the soil and groundwater at Riverside were contaminated at levels that may cause potential risk to human health and the ecosystem either under current, foreseeable future, and hypothetical future land use scenarios in the absence of additional controls or remedial actions. Soil and groundwater contamination may also present unacceptable risk to future indoor workers from vapor intrusion into future buildings that may be constructed at Riverside. Relative to NJDEP's non-residential soil standards, EPA identified the following chemicals of potential concern in soil: metals (arsenic, copper, and lead), polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs). Relative to NJDEP's groundwater standards, EPA also identified the following chemicals of potential concern in groundwater: metals (arsenic, lead, and selenium), VOCs, and SVOCs. EPA identified containerized waste at Riverside along with free petroleum product potentially leaking from underground storage tanks and within Building #15. EPA is also working in conjunction with NJDEP to address an unregulated discharge~~s~~ to the Passaic River from a pipe~~s~~ along the bulkhead adjacent to Building #10.

2.3 PROJECT ACTIVITIES TO DATE

Under Superfund, EPA uses all available tools to ensure the protection of human health and the environment. EPA and ~~the~~ a PRP~~s~~ have entered into a consent agreement ~~for the parties~~ to complete an RI/FS (refer to **Appendix 5** for contact information on the PRPs). An RI is an in-depth study that is designed to gather data needed to determine the nature and extent of contamination at a Superfund site and identify potential human health and ecological risks. The Riverside RI was completed and approved by EPA in April 2020. The RI is usually associated with a Feasibility Study (FS) where remedial alternatives to address potential unacceptable risk (identified in the RI) are evaluated and compared. The Riverside FS was completed and approved by EPA in June 2020. Together, they are usually referred to as the "RI/FS." The purpose of the Riverside RI/FS was to characterize contamination in the soil and groundwater. Surface waste piles near Buildings #7, 13 and 17 and asbestos-containing materials within Building #7 were removed by EPA in 2017-2018. **Table 1** lists major project activities and community involvement milestones throughout the Riverside RI/FS process. The RI, FS, risk assessments, and other site-related documents are available on EPA's website.

2.4 STEPS IN THE SUPERFUND PROCESS

EPA follows a step-by-step process to determine the best method to clean up a site and protect human health and the environment. The RI/FS is only one step in the Superfund process. **Figure 3** describes the steps in the Superfund process.

- **Proposed Plan**: Following the completion of the RI/FS, EPA will issue a Proposed Plan, which will list EPA's preferred remedial alternative to clean up the site. The community has an opportunity to review the Proposed Plan and provide comments during a 30-day public review

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

and comment period. A public meeting will be held during the comment period to inform the community and solicit and receive feedback on EPA's preferred remedial alternative.

- **Record of Decision**: Following State and community acceptance of the Proposed Plan, EPA will issue a Record of Decision (ROD), documenting the selected cleanup remedy and responses to public comment in a Responsiveness Summary.
- **Remedial Design**: The RD occurs after the ROD is issued and is the phase of Superfund site cleanup where the technical specifications for cleanup remedies and technologies are designed and the long-term monitoring program is developed. The RD is based on the selected remedial alternatives stated in the ROD to address soil and groundwater contamination.
- **Remedial Action**: The RA follows the RD and includes the actual construction or implementation phase of the selected remedial alternative. Throughout the RA, the community can continue to communicate their concerns to EPA, given the increase in construction activity (e.g., the community may be affected by truck traffic or construction noise).
- **Long-Term Monitoring Program**: EPA will implement a long-term monitoring program to assess the effectiveness of the remedy and provide information to make future decisions. The long-term monitoring program may include operation and maintenance to ensure that the remedy continues to be effective, as well as possible indoor air sampling to check for soil vapor intrusion. EPA will also continue to enforce institutional controls to mitigate potential risk. Institutional controls are non-engineered instruments that help minimize the potential for human exposure to contamination and/or protect the integrity of the remedy. For instance, zoning restrictions may prevent certain land uses (such as residential developments) from proceeding at Riverside. Throughout the monitoring program, EPA will ensure that the public is kept informed of project activities, milestones, and results. This process will provide the public with ample opportunities to provide input and comment throughout the life of the cleanup.

2.5 FUTURE DECISION STEPS

Community involvement, enforcement, and emergency response can occur at any time in the Superfund process. The type and frequency of community involvement varies with the urgency and type of RA. The community involvement approach should be flexible and responsive to changing site conditions and to the needs of the surrounding community. EPA will utilize several community involvement tools and activities (refer to Section 5) to notify the community of the cleanup's progress and to relay important milestones and participation opportunities to the community.

Before RA work begins, EPA will consult with the community to share the details of the RD and to explain how the work may impact local residents. Aspects of the remedial work that are expected to be of interest to the community may include: trucking and transportation routes, work hours, environmental monitoring, air quality, and potential job opportunities. EPA remains committed to keeping the communities informed and to providing opportunities for community members to become involved.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

3.0 COMMUNITY INVOLVEMENT AND FEEDBACK

The following section describes the community involvement at Riverside.

3.1 SUPERFUND COMMUNITY INVOLVMENT

There are several specific community involvement activities that are legally required under Superfund. These activities take place during specific points throughout the investigation and cleanup phases, so that the community affected by the Superfund site stays informed of project activities and can participate fully in the process, if they so choose. A brief summary of the activities conducted at Riverside is presented below:

- Community interviews and stakeholder interviews to solicit people's concerns and determine how and when people wanted to be involved.
- Publication of a formal CIP (this document) to describe and explain the outreach activities that EPA expects to undertake within the affected community.
- Establishment and maintenance of local information repositories near the location of the site so that the public may read and copy pertinent documents and reports (refer to **Appendix 7** for locations of repositories) and maintain an EPA website, so that electronic copies of the files are available.
- Establishment of an administrative record file. This file is a legal requirement of Superfund and contains electronic copies of the documents upon which EPA makes its cleanup decision.
- The publication of public notices to announce the availability of the administrative record, information repositories, and major site activities, such as public meetings. These notices are published in local newspapers, on community websites, and on EPA's website as well as shared with local organizations and elected officials.
- The release of fact sheets to document progress and project activities and to fully explain how and why those activities have been undertaken. Fact sheets may be issued in languages other than English to meet community needs (refer to **Appendix 10** for the three fact sheets issued for Riverside in April 2016, June 2017, and July 2020).

3.2 PREVIOUS COMMUNITY OUTREACH

3.2.1 April 2016 Newark Superfund "Making a Visible Difference" Public Meeting

On April 27, 2016, EPA held a public meeting under the Newark Superfund "Making a Visible Difference" initiative. The intent of this meeting was to provide information related to four Superfund sites located in the City of Newark (including Riverside) and to solicit feedback about the community's concerns, as well as suggestions for communication methods and community engagement. The meeting included a summary presentation on the Superfund process and a brief description of four Superfund sites in the City of Newark, including Riverside, Diamond Alkali/Passaic River, Pierson's Creek, and White Chemical. Attendees at the meeting included representatives from the office of the City of Newark

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

Councilman-at-Large, Newark Environmental Commission, Weequahic Park Sport Authority, Weequahic Park Association, Passaic River Coalition, Passaic Valley Sewerage Commission (PVSC), Great Swamp Watershed Association, PLANewark, and the Sierra Club, among others. Concerns were raised with respect to cleanup time, security, economic impacts, EPA oversight, recreation and future use of the Superfund sites, PRP responsibilities, and health issues. Suggestions for outreach and community involvement included:

- Establishment of clear points of contact and direct, clear, and consistent communication
- Increased presence of EPA in communities
- Increased education and awareness, including of the homeless population
- Formation of a Community Advisory Group (CAG) for all four Superfund sites
- Additional community meetings
- Engagement of city council and local representation through creation of partnerships, commissions, or coalitions
- Communication through emails and social media through the Newark Environmental Commission, bulletin board postings, churches, and local neighborhood and block groups

~~3.2.23.2.1 Outreach to City of Newark~~

~~On July 6, 2017, EPA visited residences along Chester Avenue, between Riverside Avenue and Hinsdale Place, and distributed the Riverside fact sheet to the occupants prior to the start of field activities for the RI. The fact sheet provided information on the site background and an update on site investigation activities. EPA subsequently held monthly telephone calls with the City of Newark to provide technical and legal updates during RI activities. On January 10, 2018, EPA conducted an introductory tour of Riverside for the City of Newark's legal representative, Newark Community Economic Development Corporation (CEDC) staff, and redevelopers interested in purchasing the City of Newark properties. On July 25, 2018, EPA conducted a second tour of Riverside with several representatives from the City of Newark and PRP representatives to discuss security concerns and trespassing at Riverside.~~

3.2.1 Outreach to City of Newark

On July 6, 2017, EPA visited residences along Chester Avenue, between Riverside Avenue and Hinsdale Place, and distributed the Riverside fact sheet to the occupants prior to the start of field activities for the RI. The fact sheet provided information on the site background and an update on site investigation activities. EPA subsequently held monthly telephone calls with the City of Newark to provide technical and legal updates during RI activities. On January 10, 2018, EPA conducted an introductory tour of Riverside for the City of Newark's legal representative, Newark Community Economic Development Corporation (CEDC) staff, and redevelopers interested in purchasing the City of Newark properties. On July 25, 2018, EPA conducted a second tour of Riverside with several representatives from the City of Newark and PRP representatives to discuss security concerns and trespassing at Riverside.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

~~3.2.3~~3.2.2 Outreach to Passaic River Community Advisory Group

EPA first presented information on Riverside to the Passaic River CAG at a meeting in March 2018. The presentation focused on project activities, upcoming milestones, and findings from the RI. Additional updates were provided to the Passaic CAG on November 8, 2018 and May 10, 2019 (after the completion of the RI fieldwork). The most recent presentation was provided on March 5, 2020, discussing the findings of the RI and upcoming milestones on the project. Members of the Passaic River CAG were also engaged during the April 30, 2020 meeting to determine interest in participating in the Riverside community interviews for this CIP.

3.3 COMMUNITY AND STAKEHOLDER INTERVIEWS

Commented [A4]: Were any RIP business owners or tenants interviewed? If not, why not?

To produce a CIP that truly works for the affected community, a clear and sensitive profile of the community must be generated by using community interviews to speak with the public and solicit feedback from the community. Interviews are conducted using the following process:

- Research is done into the history, demographics, infrastructure, available cultural resources, and evolution of the neighborhood. This information forms a base upon which the next steps for exploring the present community rests.
- EPA then works to ascertain who the community leaders and activists are and identifies local organizations and groups involved in issues of neighborhood concern. Networking with these contacts, a list is compiled of likely candidates that forms the backbone of the subsequent community interviews.
- EPA will contact the interview candidates, and through a series of questions, will elicit feedback from the interviewee to help define the issues and concerns of the community and to point EPA to the best means of communication and dialogue with the affected public.
- The responses and input generated during the interviews are then analyzed to see what common themes and issues appear across the information provided by the community (known as a "Common Threads Analysis"). These common threads help to guide EPA in providing the types of activities and communication tools preferred by the community.
- These activities and findings are detailed in the CIP along with a listing of community, agency, and governmental contacts; results of the community interviews; and a roster of communication tools, methods, and goals.

The following discussion describes the community interviews conducted by EPA in May 2020 to generate a community profile surrounding Riverside.

3.3.1 Overview of the 2020 Community Interview Process

In May 2020, EPA contacted approximately 20 stakeholders who may be affected by, or perceive they are affected by Riverside. The EPA and their consultant contacted these stakeholders by email and telephone, requesting interviews to represent a broad spectrum of the community from a diverse group of categories. The roster of those contacted included local residents, organizations, churches and clergy,

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

activists, groups working with immigrants, elected officials, and cultural, historic and civic associations. The process was considerably impacted by the coronavirus disease discovered in 2019 (COVID-19) pandemic, and it was exceptionally difficult to find stakeholders who were able to participate in the interview process due to office closures and other significant issues. Nevertheless, ten individuals were interviewed, with interviews taking approximately 45 minutes to one hour, depending on the interests, concerns, activities, and level of input provided by the individual interviewees.

A copy of the community interview questions is provided in **Appendix 9**. Discussion with the various interview participants provided EPA with valuable insight and feedback into the relationship between the community and the agency, and the interviews provided EPA with a means for identifying the best methods for community interaction and communication during the cleanup process. The findings listed in the sections below represent the feelings, opinions, and interests of those who participated in the interviews; enumerate "common threads" expressed during the interviews; and present specific suggestions, needs, and concerns that came up during the interview process.

3.3.2 Key Community Concerns

The following are key community concerns expressed during the May 2020 community interviews and represent the "Common Thread Analysis":

- Most interviewees indicated that they had no knowledge of Riverside and were unaware of EPA's work or involvement there. They also stated that they were unaware of hazardous materials or chemicals found at Riverside. Some felt it was due to the remoteness of the site.
- Regarding specific environmental issues related to the community, interviewees indicated air and water quality as serious concerns and impacts to residents' health. Some indicated that the North Ward, and much of the City of Newark overall, has numerous problems with both historic and ongoing pollution and has high levels of asthma; and that the North Ward has been particularly hard hit by COVID-19.
- Potential air emissions from Riverside during remediation ~~must~~ could be addressed by tenting and/or filtration. The North Ward is already affected by air emissions from planes out of Newark and Teterboro Airports, which are also a source of noise pollution.
- Regarding Environmental Justice, interviewees indicated that the area is home to many Spanish-speaking people and that Spanish translation is essential to keeping the community informed. Additionally, the North Ward is a community with many immigrants, some undocumented, who are afraid to speak out or get involved; there is also a large deaf community in the City of Newark.
- Most interviewees indicated that environmental cleanup is important to economic development; and that having a Superfund site in the neighborhood can lead to a negative perception about the neighborhood.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

- Impacts from Riverside to the health of the Passaic River was mentioned, and the fact that while some boating and rowing has been seen on the river, it takes place further north and not in the Newark community.
- There were concerns about the homeless populations near Riverside, and several interviewees spoke about the disproportionate environmental burden placed on low-income residents and related pre-existing health conditions.
- Interviewees commented that it would be of benefit to the community if EPA and the City of Newark would partner during the cleanup, especially as related to post-remedy development (however, it should be noted that EPA is not involved in post-remedy development).
- There are concerns about security at Riverside, vandalism from outside elements, and overall safety. It was also voiced that Riverside is a "dumping ground."
- Few interviewees were aware of any local environmental resources available to EPA in the area; but many mentioned the main Newark Public Library as a source of information, documentation, and education important to the community.
- Community access to the riverfront in the area would provide recreational activity and "give people something nice to look at." It would also be beneficial to economic development and provide a tax base to the City of Newark.
- Regarding the community taking a role in the cleanup at Riverside, some interviewees voiced it as: "Those closest to the problem are closest to the solution." If people could get involved in working with the EPA, it would go a long way in bringing about a feeling of trust. People often feel left out by the government even though they bear the brunt of the problem that brought the government there in the first place.
- Several interviewees noted that EPA should partner with local officials and organizations to bring the people of the community into the process. Churches and local clergy, social services, and organizations working with low-income populations and immigrants as well as schools and recreation centers are deeply integrated into the community, and they can aid EPA in this effort since people trust messengers that they know.
- Project fact sheets could be distributed via local governmental officials, schools, libraries, recreation centers, and the management offices of large building complexes. Interviewees also cited local businesses extensively used by residents, such as bodegas, grocery stores, laundromats, and restaurants, as good distribution centers for EPA information about activities and updates at Riverside.

3.3.3 Key Communication Preferences

It is of primary importance to understand the communication preferences of stakeholders to ensure a clear and appropriate dialogue between EPA and the public. This communication needs to address potential environmental risks and endeavor to foster meaningful discussion, understanding, and trust in a thoroughly transparent manner. With these objectives always in mind, EPA facilitated input and feedback from interviewees to determine the best ways to engender effective communication of relevant, useful, and accurate information in ways that are easily understandable and tailored to the needs of the affected

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

community. The lists below highlight key communication preferences as presented to EPA during the May 2020 community interviews:

- Interviewees strongly supported electronic communication, such as email, internet, and EPA's website. They also felt that Facebook could be used effectively along with other forms of social media. All agreed that "no one size fits all," and they recommended that EPA be open to a variety of platforms. However, there was concern for those individuals who are not tech-savvy, so mailings were also recommended along with flyers in the neighborhood.
- More traditional methods of communicating information were also actively discussed, with interviewees suggesting the use of online newspapers, such as The Patch, Newark Times, TAP Into Newark, and the Community Bulletin Board broadcast by Optimum Online cable as well as the Newark Star-Ledger and Spanish language newspapers. The management of Riverside Arms Apartments near Riverside has also offered the use of its monthly newsletter to provide information to over 100 tenants in the complex. Local Newark radio station WGBO-FM 88 is a good source for local news as well as NJ News 12 and NJN Public TV.
- On the subject of regularly scheduled public meetings and information sessions, most interviewees indicated that these meetings should be held shortly after information regarding activities or updates at Riverside has been distributed to the community, so people have a sense of purpose in attending the meeting. The subject of virtual meetings was discussed until things go back to "normal" due to the COVID-19 pandemic. There was considerable agreement that it is easier to attend virtual meetings with the demands of jobs and family to consider. The possibility of EPA's recording public meetings for viewing later was also suggested.
- An issue strongly supported by a number of interviewees is that of EPA reaching out to the community on a personal level, going door to door, boots on the ground, or as one individual put it: "foot soldiers in the neighborhood," who will interact with residents and local businesses, providing project information and answering questions. This activity can assist in fostering a sense of trust between community members and EPA, and it can provide residents with a sense that government cares about them as individuals and is interested in what they have to say.
- Public meetings need to be held in easily accessible locations in the neighborhood that people can walk to or take public transportation. Suggested locations include Waterfront Recreation Center on Grafton Street, the Community Room at Riverside Arms, local schools and churches, and meeting rooms at Branch Brook Park.
- The usefulness of a CAG was discussed, with many interviewees voicing support for some type of group that would be involved in Riverside and interact with governmental officials and agency representatives. This group can either form as an independent CAG or be a sub-group of the existing Passaic River CAG. It was mentioned that a CAG requires time and effort on the part of the members, and that the formation and function of a CAG must be left up to the community.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

4.0 COMMUNITY PROFILE

The following section describes the current physical, social, and economic conditions of the City of Newark and the community surrounding Riverside. Information presented below was retrieved from the United States Census Bureau, geographical information system databases, and county and municipal websites, among other sources. Some topics are presented at a city-specific level of detail while other topics, such as population and demographics, are discussed in finer detail.

4.1 HISTORICAL DEVELOPMENT

The City of Newark was founded in 1666 by Puritans from Connecticut who desired a more religiously oriented local government. The area was selected due to its location along the Passaic River. Two major streets, Broad and Market Streets, were laid out, and 6-acre plots were created. The first settlers used the area for farming, and early industries were leather tanning and quarrying, which started about 1700. With the development of a road and railroad network in the region, as well as the construction of the Morris Canal, the City of Newark was able to become one of the nation's industrial and manufacturing capitals. The industrial boom was supported by an influx of immigrants in the 1800s, which significantly increased the City of Newark's population. Leather tanning and quarrying brownstone continued to be important industries, along with the manufacture of shoes, saddles, and other leather goods; breweries; and the manufacture of carriages, coaches, lace, hats, cider, paint, varnish, cutlery, jewelry, cotton thread, and a variety of machines, as well as plastic and metal products. As a result of the industrial development, the City of Newark's banks and insurance companies began to develop and grow. The character of the City of Newark changed over time from small cottage industries in the late 1700s and early 1800s to large industrial complexes, supplying not just the nation, but the world, by the early twentieth century.

4.2 LAND USE AND INFRASTRUCTURE

The City of Newark is urban and densely developed with land uses ranging from heavy industry, transportation corridors, and air and seaports to residential, commercial, and higher educational uses. According to its 2012 Master Plan, 65 percent of the City of Newark consists of residential dwellings, including one-family and two-family houses and a range of apartments. Commercial operations, including retail and office space, account for approximately 11 percent of the City of Newark. There are several large commercial shopping centers located in Fairmount, the West Side, and the Ironbound areas. Most office space is concentrated in the City of Newark's downtown area. Governmental land usage accounts for 14 percent of the City of Newark, which includes the airport, entertainment facilities (e.g., New Jersey Performing Art Center and the Prudential Center), cultural and civic institutions (such as museums, libraries, and sports facilities), and fire and police stations. Approximately 9 percent of the City of Newark's land parcels are vacant, which can be attributed to abandonment, neglect, and deterioration following a period of post-World War II decline and the 1960s-era civil riots in the City. Vacant parcels are present across most of the City of Newark and encompass residential, commercial, and industrial properties. The remaining 1 percent of land parcels in the City of Newark are classified as industrial and warehouse.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

The City of Newark is divided into five political wards – the North (where Riverside is located), South, East, West, and Central Wards, as described below.[4]

- The North Ward is known for two neighborhoods: Forest Hills and Roseville. The North Ward consists of a mix of Italian-Americans, African-Americans, Puerto Ricans, and immigrants from the Caribbean and Latin America. It also contains Branch Brook Park, the largest park in the City of Newark. There are 15 public schools, four fire stations, two police station, three branch libraries, and two daycare centers, as well as a number of senior citizen and other cultural centers in the North Ward.
- The South Ward's two signature neighborhoods are Weequahic and Clinton Hill. The South Ward was historically home to a predominantly Jewish community but is now occupied primarily by African-Americans and Hispanics. There are 17 public schools, five daycare centers, three branch libraries, one police precinct, a small precinct, and three fire houses in the ward, as well as Newark Beth Israel Medical Center, the City of Newark's second-largest hospital.
- The East Ward consists of three neighborhoods: Ironbound, Dayton, and the Downtown section. The largest ethnic groups in the East Ward are Portuguese, followed by Spanish, Puerto Rican and Cuban, with smaller amounts of other ethnicities. The Ironbound district is well known for its Portuguese and Spanish cuisine. There are 13 public schools, two universities, three police stations, seven fire stations, two library branches, three daycare centers, and one hospital in the East Ward.
- The West Ward contains the Vailsburg section of the City of Newark, which includes Ivy Hill Park. It was historically occupied by Irish-Americans but is currently home to primarily African-American and Haitian communities. There are 10 public schools, two police precincts, four fire stations, one branch library, and two daycare centers in the West Ward. Seton Hall University School of Law serves as one of its borders.
- The Central Ward is also known as Science Park and the old Third Ward. Its residents are primarily African-American. This ward was historically the City of Newark's central business district and contained major department stores. At present, there are four colleges and universities (Rutgers, Essex County College, the New Jersey Institute of Technology, and Rutgers New Jersey Medical School), as well as 26 public schools, two police precincts, four firehouses, and one branch library in the Central Ward.

4.3 TRANSPORTATION INFRASTRUCTURE

The City of Newark serves as a major transportation hub for the movement of people and goods, and an estimated one-third of the City's area is utilized for transportation facilities, including airports and seaports, passenger and freight facilities, rail freight, rail and bus transit, and parking. The City of

[4] Source: https://web.archive.org/web/20111020203207/http://www.ci.newark.nj.us/residents/neighborhood_services/ Ethnic groups are identified as described by the City of Newark.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

Newark has several major regional and state highways, including Interstates 280, 78, and 95, and the Garden State Parkway. The City of Newark is served by public transportation in the form of bus, train, and light rail service. There are three commuter rail stations in the City of Newark, including Penn Station, Broad Street Station, and the Newark Liberty International Airport Station. Three heavily-used transit systems within the City of Newark are Amtrak, New Jersey Transit, and the Port Authority Trans-Hudson (PATH). In addition, New Jersey Transit operates the Newark Light Rail System, which consists of the Newark City Subway and the Newark City Subway Extension. The Newark City Subway runs between Penn Station and the Grove Street Station in Bloomfield and primarily operates above ground. New Jersey Transit operates numerous bus routes serving the City of Newark and nearby areas, with Penn Station acting as a key hub. In addition, there are several private bus operators in the City of Newark. Finally, the Port Authority of New York and New Jersey (PANYNJ) operates the PATH rapid transit service from Newark Penn Station to the World Trade Center Station in New York City. Newark Liberty International Airport, one of the nation's busiest international travel hubs, is located approximately 4 miles south of Riverside. The airport straddles the boundary between the cities of Newark in Essex County and Elizabeth in Union County. It is jointly owned by the two cities and leased to and operated by the PANYNJ. The Port Newark/Elizabeth Marine Terminal, the largest container port on the East Coast of the United States and third largest in the nation, is also located about 4 miles south of Riverside, just east of the Newark Liberty International Airport. The port is also managed by the PANYNJ.

4.4 DRINKING WATER, SEWER, AND POWER

States may exercise primary enforcement responsibility for drinking water supply programs if certain conditions are met (i.e., the state has adopted drinking water regulations that are no less stringent than the federal regulations, and it has adopted and is implementing adequate procedures for the enforcement of the state regulations). In the State of New Jersey, the NJDEP monitors water systems. Drinking water in the City of Newark is supplied by the Newark Department of Water and Sewer Utilities.

The Newark Department of Water and Sewer Utilities is also responsible for the collection and delivery of sewage generated in the City of Newark to the designated sewerage treatment facilities, and the collection and handling of stormwater and combined sewage. The City of Newark uses both separated and combined sewer systems. The separated sewer system (SSS) consists of two different pipes for sanitary sewage and stormwater, with the sewage transported to a sewage treatment plant (STP) for treatment and the stormwater discharging to a nearby water body. The combined sewer system (CSS) conveys sanitary sewage and stormwater in the same pipe to an STP for treatment, followed by discharge to a water body. However, the volume of water in the CSS can exceed its conveyance capacity or the capacity of the STP during times of heavy precipitation or significant snowmelt. Therefore, the CSS is designed to occasionally overflow and discharge a mixture of untreated sewage and stormwater directly to waterways. These overflows are called combined sewer overflows (CSOs), ~~and the discharges typically contain oil, grease, total suspended solids, pathogens, nutrients, oxygen-demanding organic compounds, and other pollutants. The CSS in the City of Newark was constructed in 1910 and primarily serves the city center, including Riverside.~~

Commented [A5]: These two paragraphs may not be consistent with EPA's goals for community outreach (e.g. Goals 2 and 4 below) because they do not clearly distinguish between the Newark-wide system and Riverside's connections to the system, or describe them completely. Unlike the other sections in Section 4, this Section 4.4 contains Riverside-specific information on complex topics more thoroughly covered in the RI/FS. For instance, though the Herbert Place CSO runs underneath Riverside, Riverside is not connected to the Herbert Place CSO. Suggested edits clarify this section.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

Formatted: Normal TNR, Line spacing: single

Wastewater from the City of Newark is conveyed to a treatment facility in the port area that is operated by the PVSC, which serves 1.5 million people in 48 municipalities in parts of Essex, Bergen, Hudson, Passaic, and Union Counties. ~~PVSC's treatment facility processes over 300 million gallons of wastewater per day. In wet weather, excess flow is diverted to the Passaic River and Newark Bay. There are 12 permitted CSOs along the Passaic River, two of which are in the vicinity of Riverside. The Herbert Place CSOs (Identification Numbers: 004A and 005A) are located on the south side of Riverside. The Delavan Avenue CSO (Identification Number 003A) is located just north of Riverside.~~

The regional electric utility company that serves the City of Newark is Public Service Electric & Gas (PSE&G). The Newark Department of Engineering is responsible for the maintenance, operation, and repair of all the City's infrastructure systems, with support from the Newark Department of Public Works.

4.5 PARKS AND RECREATION

Open space in the City of Newark occupies approximately 793 acres, with the most significant parks located in the North Ward with Branch Brook Park (341 acres) and the South Ward with Weequahic Park (311 acres). Parks and recreational activities near Riverside include:

- The Essex County Park System features 24 parks (including Branch Brook Park and Weequahic Park), five reservations, three golf courses, an environmental center, a castle, an art park, and a recreational complex which offers a zoo, ice skating arena, miniature golf, boating, picnic area, and walking paths.
- The Newark Department of Recreation, Cultural Affairs and Senior Services features six recreation centers, which offer indoor pools, basketball courts, game rooms, and weight rooms; five senior centers; and seven Centers of Hope, which are community-based facilities providing access to wellness and enrichment opportunities.
- The Newark Watershed area was purchased in 1900 and consists of 35,000 acres spanning six municipalities in Morris, Passaic, and Sussex Counties. The area is located within the Pequannock Watershed and includes streams and four large reservoirs. Recreational activities in the Newark Watershed include boating, fishing, camping (including summer camps), hunting, hiking, and horseback riding.

4.6 POPULATION AND DEMOGRAPHICS

Data from the City of Newark and the surrounding region were used to create the community profile for Riverside. Data were obtained from the 2014-2018 American Community Survey (ACS), accessed in May 2020 (refer to **Table 2** for summary statistics). The population and economic characteristics of Essex County, City of Newark, and State of New Jersey were reviewed for this analysis.

The ACS provides cross-sectional data on social, economic, demographic, and housing characteristics of the United States population at various geographic levels (nation, region, state, congressional district, and

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

census tract). In general, ACS estimates are period estimates that describe the average characteristics of population and housing over a period of data collection. The 2014-2018 ACS five-year estimates represent the period from January 1, 2014 through December 31, 2018. Multiyear estimates cannot be used to say what is going on in any particular year in the period, only what the average value is over the full period.

4.6.1 Population

According to ACS estimates, the population for the City of Newark was approximately 282,090 individuals in 2018. The population experienced an increase of 1.8 percent between 2010 and 2018.

4.6.2 Household Income

Median income is the value that divides the income distribution of a population into two equal groups, half having income above that median value and half having income below that median value. The median household income of residents in the City of Newark was $35,181, based on ACS five-year estimates for the period of 2014-2018.

4.6.3 Race and Ethnicity

Within the City of Newark, the majority of the population (88.5 percent) identified as one race during the period 2014-2018.[5] Among these individuals, 49.7 percent self-identified as Black or African American alone; 36.7 percent self-identified as white alone; 2.1 percent self-identified as Asian alone; and 0.5 percent self-identified as American Indian and Alaskan Native alone. The United States Census Bureau does not have an estimate for Hispanic or Latino alone; 36.4 percent self-identified as Hispanic or Latino of any race. Refer to **Figure 4** and **Table 2** for summary statistics of the surrounding community.

The Office of Management and Budget (OMB) defines "Hispanic or Latino" as a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race. The United States Census Bureau defines "Hispanic origin" as "the heritage, nationality, lineage, or country of birth of the person or the person's parents or ancestors before arriving in the United States." Since Hispanic or Latino can be of any race, the United States Census Bureau adopted an approach taken by the Department of Health, Education, and Welfare, Office of Education that clarifies the "White" and "Black" categories with the definition "not of Hispanic origin."

4.6.4 Environmental Justice

On February 11, 1994, President Clinton issued Executive Order 12898. This order directs agencies to address environmental and human health conditions in minority and low-income communities to avoid the disproportionate placement of any adverse effects from federal policies and actions on these

[5] The United States Census Bureau asks respondents whether or not they are Hispanic since the Unites States Census Bureau defines Hispanic as an ethnicity, not a race. Hispanics can, for example, be Black, White, American Indian, Asian or "Some Other Race".

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

populations. EPA defines environmental justice as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Conditions giving rise to environmental justice concerns are specific to individual communities and their histories.

The United States Census Bureau's poverty statistics represent the number of people below the bureau's poverty thresholds. Poverty thresholds vary by family size, number of children, household units (single versus multi-family), and whether or not respondents are elderly. Within the State of New Jersey, the population for whom poverty status could be determined for the period of 2014-2018 was 9.5 percent. Within Essex County, this statistic was 14.9 percent for the same period. Within the City of Newark, the poverty rate was 28 percent during the 2014-2018 period. Within the State of New Jersey, on average, 9 percent of all households received food stamps/supplemental nutritional assistance program (SNAP) benefits during the period of 2014-2018. Within the City of Newark, approximately 27 percent of households received food stamps/SNAP benefits during the same period.

Environmental justice considerations are determined by comparing demographic and economic characteristics (minority population composition and poverty rates) within specific geographic areas to the same characteristics in the surrounding region. Typically, census data are used to identify communities that are disproportionately either young or elderly, low-income, and whose residents are more likely than residents of surrounding areas to lack a high school education.

To further enhance clear understanding of communities affected by environmental justice issues, EPA uses EJSCREEN. EJSCREEN is an environmental justice mapping and screening tool. It uses environmental indicators of a community to show potential exposures and demographic factors to show potential susceptibility. To learn more about EJSCREEN, go to: https://www.epa.gov/ejscreen.

4.6.5 Educational Attainment

According to environmental justice research, lower educational attainment constrains the ability of populations to understand and have access to information. Furthermore, populations with higher education have access to higher earnings, which can lead to increased socioeconomic status and political participation. Approximately 75 percent of the population (aged 25 years and older) in the City of Newark possessed at least a high school diploma or equivalent for the period 2014-2018. This number is 11 percentage points lower than a similar statistic for Essex County (at 86 percent). The rate of educational attainment for the State of New Jersey is 89.5 percent for this reporting period.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

5.0 COMMUNITY INVOLVEMENT ACTION PLAN

The following section discusses specific community outreach tools and activities that EPA has used successfully across a broad spectrum of sites and in diverse communities. Not all tools listed will necessarily be used at Riverside; outreach method and activities will be tailored to the specific needs and requests of the community affected by the cleanup and interested in the project.

5.1 COMMUNICATION GOALS

EPA is committed to providing opportunities for public participation so that people whose lives have been impacted by Riverside have a voice and say in what happens in their community. In accordance with this goal, EPA has established the following four major goals to guide the community involvement and outreach process:

- **Goal 1: Be Appropriate:** Being mindful of the fact that one size does not fit all, use the most appropriate communication methods and tools for the specific community involved.
- **Goal 2: Be Understandable:** Always use clear and consistent language, when communicating with the public. Community materials will be translated into the prominent languages of the community (e.g., Spanish). Respect and give full consideration to community input.
- **Goal 3: Be Responsive:** Respond to community questions and concerns, encouraging feedback and input throughout the cleanup. Get answers and information to the community in as timely a manner as possible.
- **Goal 4: Be Accurate:** Provide the public with accurate, timely, and understandable information or provide access to the information needed to understand the project. When new information is available, continue to share it with the community using the most appropriate and timely methods.

To meet these goals, EPA will reach out to and seek to involve a broad spectrum of the public such as:

- Community members (including homeless populations)
- Interested groups
- Environmental organizations
- Businesses and economic development groups
- Civic associations
- Local chambers of commerce
- Elected officials
- Educational institutions
- Recreational and sports organizations
- Local, state, and federal agencies
- Local media

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

EPA will seek to partner with local officials, community organizations, neighborhood schools, and houses of worship to assist in community outreach. These additional "helping hands" provide one more avenue of communication; assisting in the effort to ensure that all members of the community have information about Riverside and the cleanup made available to them.

The agency will also coordinate with and brief local officials, keeping them informed of major project milestones and providing opportunities for input into decision-making.

5.2 COMMUNITY INVOLVMENT TOOLBOX

The Toolbox lists key tools that EPA may use to communicate with stakeholders. EPA's Community Involvement Coordinator will use these tools to keep the public informed, to maintain awareness of community concerns regarding local issues that may affect the project activities, to respond to questions or concerns from the community, and to encourage public participation in the decision-making process. The following sections discuss these tools and their potential outreach application. Tools are listed in alphabetical order with no preference or priority to the tool (refer to **Table 3** for summary of the community involvement toolbox).

5.2.1 Community Advisory Group

Description: A CAG is made up of representatives of diverse community interests, who serve as liaisons for their communities and constituents. A CAG may form at any point in the Superfund process or when a community has concerns about cleanup implementation. A CAG offers a unique opportunity for providing community input, especially on issues of cleanup and restoration. A CAG can also assist EPA in making better decisions. However, the existence of a CAG does not eliminate the need for EPA to keep the community informed about plans and decisions throughout the cleanup process.

Goal: Provide a public forum for community members to present and discuss their needs and concerns related to the decision-making process and serve as a platform to raise issues already voiced as key concerns.

Method: Currently, a CAG does not exist for Riverside. CAGs may be formed at any point in the cleanup process. EPA may assist communities in determining the need for a CAG by helping them evaluate the level of community interest in and concern about activities at Riverside. EPA may also examine if there is an existing broad-based group that might function as a CAG. EPA, together with state/local government(s), local community groups, and others, may assist the CAG with administrative support on issues relevant to the Superfund site cleanup and decision-making process.

5.2.2 Community Events

Description: EPA may participate in community events, such as local fairs, festivals, and cultural festivities to distribute information, answer questions, and interact with members of the local community.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

Goal: Community events provide EPA with the opportunity to build and maintain positive relationships within the community and to better understand the culture of those living there. These events also provide a more casual atmosphere for agency representatives to engage with the public. Community events may also serve to enhance awareness about environmental justice issues and allow EPA to interact directly with community members who might not typically attend public meetings or information sessions (refer to Section 5.2.14 on Public Meetings).

Method: To the extent feasible, EPA may supply and staff an information booth at appropriate events to distribute information and engage in conversation with community attendees.

5.2.3 Coordination with Local Government and Other Agencies

Description: EPA will coordinate with local government, and other state and federal agencies to keep them informed of project activities and obtain feedback on their concerns. Communication with these representatives will continue through the life of the project.

Goal: EPA will coordinate with local government officials, and other state and federal agencies to keep them informed of project activities and issues that may impact their constituencies. Engaging in dialogue and coordination with these entities will help to address community concerns associated with the project. Coordination will assist in encouraging consistency among local health advisories and clarifying the roles and jurisdictions of the various agencies involved.

Method: EPA will continue to engage in dialogue and build positive working relationships with local representatives.

5.2.4 Electronic Mail (Email)

Description: Electronic mail (or email) can be used to contact EPA's Community Involvement Coordinator and Project Manager for information and to ask questions about the project. EPA's contacts are included in all outreach materials.

Goal: Email provides another method to assist the public in providing input or requesting information.

Method: EPA will use email to distribute updates, notifications, and progress reports to interested parties. The goal of email is to circulate information as quickly and effectively as possible. To subscribe or unsubscribe from EPA's mailing list, please contact Ms. Shereen Kandil, Community Affairs Team Lead (refer to **Appendix 3** for EPA's contact information).

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

5.2.5 Fact Sheets

Description: Fact sheets, also called community updates, are brief documents written in plain language with user-friendly graphics, to help the public understand highly technical reports, concepts, and information.

Goal: Provide information in "everyday language" and in an easy-to-understand format.

Method: Fact sheets will continue to be produced and distributed throughout the life of the project to keep the public informed on cleanup progress and the decision-making process. Fact sheets will be developed in English and in prominent languages of the community (e.g., Spanish). Dissemination will be via email, postings on EPA's website, and public forums. Fact sheets are also placed in the information repository. Refer to **Appendix 10** for current and previous fact sheets developed for Riverside, and refer to Appendix 7 for listing of information repositories.

5.2.6 Field Notifications and Health and Safety Notifications

Description: This type of information consists of advisories, restrictions, and explanatory signs posted to clearly mark for the public any project work areas and access restrictions.

Goal: These notifications are intended to keep the public informed of project field activities and maintain public safety. They will address the specific key public concern of the potential health issues and may include information on trucking and transportation routes, work hours, worker protection, community safeguards, environmental monitoring, and emergency response.

Method: All advisories, signs, and restrictions to access will be clearly posted and may be translated into multiple languages, if necessary. EPA is committed to having signs in place at all times and will repair or replace damaged signs as needed. EPA may also post the construction Health and Safety Plan to inform the public and maintain a safe environment.

5.2.7 Information Repositories

Description: Information repositories are located in local public buildings, such as libraries, universities, and government offices, where site-related and supporting documents are available for public review. An information repository (called the Administrative Record) is also available at EPA's Record Center (refer to **Appendix 7** for contact information on the information repositories).

Goal: Provide residents with accessible locations where they may read and copy official documents. Provide electronic copies of documents, so that residents and other stakeholders can download and read documents.

Method: EPA will continue to maintain the information repositories, adding documents and information as they become available. In addition to the Information Repository at EPA's Record Center, EPA will

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

locate an Information Repository in the North Ward community at a local library, Town Hall, or other location convenient to the community.

5.2.8 Mailing List Updates and Maintenance

Description: EPA has an extensive mailing list of individuals and organizations. Utilizing several methods, EPA has solicited additional mailing addresses from community members interested in the project.

Goal: Mailings effectively communicate project and event information to a wide and diverse audience and provide information to community members who do not purchase newspapers, use computers, or have access to the Internet.

Method: Methods for increasing the mailing list may include coordination with elected officials using constituent mailing lists; sign-up sheets at public meetings, information sessions, and festivals; and contact with community-based organizations to invite their members to sign up.

5.2.9 Maps and Visual Aids

Description: Maps and visual aids help people understand where Riverside is located in the community, so that the community can understand the relation between Riverside and where they live, work, and attend school.

Goal: To communicate complex issues simply and effectively.

Method: Visuals, including maps in outreach material (such as fact sheets and poster boards), can increase an individual's ability to understand and recall messages and information. Photographs or electronic copies of poster boards displayed at public meetings will be posted to EPA's website.

5.2.10 Media Notification/Media Events

Description: EPA will continue to provide updates and information to local newspapers, radio, and television outlets.

Goal: To reach a large audience quickly and reinforce important messages and information related to the project.

Method: EPA will continue to coordinate with key stakeholders to ascertain the best media outlets to reach the target audience, ensuring that the entire community is covered by those media outlets and that the information presented is concise and understandable (refer to **Appendix 8**).

5.2.11 Newsletters

Description: Newsletters use clear, understandable language, are more community-oriented, and may include articles, columns, and photographs.

Goal: To keep the public informed and up-to-date, and regularly provide information. Newsletters will serve to enhance the public knowledge base on issues regarding project status and information.

Method: If newsletters are created in the future, EPA intends to distribute them via email and post them to EPA's website. Print copies will be made available at public meetings and forums on the project and will be provided to stakeholder organizations, which will help achieve a broader reach. At other Superfund sites, newsletters have been mailed, on a limited basis, to those on a postal mailing list. EPA may periodically review the efficiency and effectiveness of mailing newsletters on this project and will consult with stakeholders in deciding how this tool would be implemented.

5.2.12 Public Comment Period

Description: Public input is welcome at any time during EPA's investigation and cleanup process. There are several defined points, or public comment periods, in the process where more formal public input is solicited. The public comment period is a formal opportunity for community members to review and comment on various agency documents or actions. Comment periods are legally required for the Proposed Plan, ROD, Consent Decrees, and the addition to or deletion of a Superfund site from the NPL, or if changes to previously announced cleanup decisions are anticipated, among other things.

Commenting is an important way to make your voice heard. Public comments can strengthen an environmental decision by providing the agency with facts or perspectives that were lacking in the original draft. Here are some tips on making the most of your comments:

- Prepare for commenting by familiarizing yourself with the scope of the issue and relevant laws.
- Identify your key issues and concerns.
- Identify allies who can help with the document review and understanding of the report and coordinate your comments with them to strengthen your message.
- Be specific with your comments, including what you think could improve the document, what you think is missing from the document, what you like about the document, and what parts you want to remain in the document.

Goal: Provides an opportunity for the public to give meaningful input in the decision-making process.

Method: EPA will announce each future comment period through one or more of the following methods: public notices in local newspapers, email notifications, and fact sheets to ensure that the public has sufficient opportunity to understand what is being presented, when comments will be accepted, how long the comment period will be open, and how to submit comments. Comments may be submitted to EPA

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

via regular mail or email within the public comment period time frame, which is announced on EPA's website and through public notification.

5.2.13 Public Input

Description: Written communications and informal discussions with agency staff are just some of the ways that EPA can be reached to communicate about project-related information. This open line of communication is important to gain better understanding of the public's concerns and needs, so that they can be addressed efficiently and effectively.

Goal: Verbal comments and letters provide continued opportunity for the public to give input and allow EPA to recognize trends in issues of public concern and identify areas that require information and clarification.

Method: Informal comments can be offered at any time, such as during information sessions, open houses, community visits, and workshops. Written comments may be submitted via mail or email (refer to **Appendix 3** for EPA contact information).

5.2.14 Public Meetings

Description: EPA offers both formal and informal meetings to discuss the status of a project with the community. "Public meetings" are structured, formal meetings, often required by law, that are open to the general public, featuring a presentation and interaction with the public. Public meetings feature the use of a court reporter and the issuance of meeting transcripts. Other types of meetings are less formal and may be held in a variety of formats, including small group discussions, informal open-house style information sessions, poster presentations, and virtual meetings. "Information session" are informal public meetings where EPA can discuss issues and answer questions. Information sessions offer the public the opportunity to learn about project-related issues and to interact with EPA on a one-to-one basis. Information sessions do not require the use of court reporters and transcripts, although EPA may issue meeting summaries.

Goal: To provide personal contact with agency representatives, update the community on project developments, and address community concerns, ideas, questions, and comments.

Method: At various stages throughout the project, EPA will hold formal or informal public meetings to keep the public informed, answer questions, and further explain the cleanup process. Each meeting will be structured to fit its purpose by using different formats (e.g., open houses, informal discussions, or PowerPoint presentations). Public meetings and information sessions are open to the public, and EPA encourages the community to ask questions and provide comments. Public meetings and information sessions will be held at a convenient location and time (either in person or as an on-line virtual meeting), so that most interested parties are able to attend. EPA will also provide translators for non-English speaking community members.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

5.2.15 Public Notices

Description: Widely distributed announcements of public comment periods, public meetings, and major project milestones.

Goal: Communicate an important announcement to as many people as possible.

Method: Public notices will be released to announce public comment periods and public meetings using a wide variety of media and methods, such as: email notices, EPA's website announcements, press releases, and newspaper display advertisements. EPA has also reached out to stakeholder and community groups to request their assistance in disseminating information. Public notices will be released at least two weeks (whenever possible) before scheduled public meetings.

5.2.16 Project Site Visits/Tours

Description: EPA may partner with stakeholder groups to arrange guided tours to view project activities when such tours are appropriate, feasible, and safe.

Goal: Site visits and demonstrations provide the public with a good working understanding of project work and conditions. Bringing the public to the site and demonstrating and/or discussing project activities in the field will provide project updates and address community concerns.

Method: EPA may partner with stakeholder groups to conduct tours to explain field activities and why they are important to the project. There may be activity or location-specific circumstances, however, where EPA will have to limit activities or areas visited, given health and safety requirements.

5.2.17 Project Roadmap

Description: Over the course of the project, a significant amount of technical work has been performed and will continue to be developed. A project roadmap may be used by EPA to communicate to the community the major project activities completed, upcoming events, or provide a listing of future deliverables. The roadmap may also highlight some of the planned public involvement activities.

Goal: The intent of the roadmap is to illustrate the general sequence of events that takes place over the period of time leading up to, and including, the decision-making process for Riverside.

Method: EPA may create a project roadmap as a stand-alone document that would be periodically updated as work progresses.

5.2.18 Project Websites

Description: Electronic versions of technical reports, progress reports, and updates on the cleanup are available on EPA's Riverside Industrial Park Superfund website.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

Goal: Project websites provide key resources for accessing both general and specific information about environmental restoration projects, the roles of government agencies, and public outreach activities. Access to the current website is unrestricted.

Method: EPA will continue to post project updates, notices, and technical documents in a timely manner. The project website is regularly updated and enhanced. Moving forward, EPA may periodically solicit input from the public at public forums and workgroup meetings on how to make the website more user-friendly. Feedback on EPA's Riverside Industrial Park Superfund website is encouraged (refer to **Appendix 3** for EPA contact information).

5.2.19 School/Educational Outreach

Description: EPA will provide project information to local schools and academic institutions, and will work with existing educational programs to "piggyback" project information and identify additional opportunities for environmental education.

Goal: Educational outreach helps bring project awareness to new audiences and builds bridges between the agencies and various constituencies within the community. Engaging students and teachers will assist in addressing a number of community concerns such as: sharing important information about the nature and extent of contamination at Riverside, explaining the potential risks to human and ecological health that require action, raising awareness of environmental justice issues, and encouraging environmental stewardship.

Method: Educators and students may request EPA staff to visit their school. Agency staff will also maintain an open line of communication with groups that provide environmental education to local schools and partner with them when appropriate.

5.2.20 Social Media

Description: EPA may use social media (such as **Twitter** and **Facebook**) to post updates about Riverside and announce major project milestones.

Goal: To reach more people and provide another method for sharing information.

Method: On other sites, EPA has employed Twitter and Facebook to share press releases, send out meeting reminders, and write and post social media content regarding announcements and major project milestones.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

5.2.21 Superfund Jobs Training Initiative

Description: Superfund Jobs Training Initiative (SuperJTI) is an environmental cleanup job readiness program that provides free job training and employment opportunities for citizens living in communities affected by Superfund sites.

Goal: To assist communities in the development of job opportunities and partnerships that remain long after a Superfund site is cleaned up, especially in communities facing environmental justice challenges.

Method: EPA offers SuperJTI training through its Technical Assistance Services for Communities (TASC) Program (refer to Section 5.2.23 below), although the training is subject to funding availability. SuperJTI combines classroom instruction with hands-on training exercises for each participant. Program graduates gain the technical skills necessary to work on a broad range of projects in environmental remediation and construction fields. Positions may include dump truck drivers, environmental technicians, general production operators, material handlers, and heavy equipment operators. Currently, SuperJTI training has not been initiated for Riverside.

5.2.22 Technical Assistance Grant

Description: A Technical Assistance Grant (TAG) provides money to community groups, so they can hire technical advisors to interpret and explain technical reports, site conditions, and EPA's cleanup proposals and decisions at Superfund sites. An initial TAG of up to $50,000 is available for any Superfund site that is on EPA's NPL or proposed for listing on the NPL where a response action has begun. As specified in Section 117(e) of the Superfund law, there can be only one TAG for each Superfund site. However, when the grant recipient changes (e.g., when EPA or the recipient terminates the original TAG), the process of applying for a TAG starts over.

Goal: The goal of a TAG is to help improve a community's understanding of the environmental conditions and cleanup activities at Superfund sites.

Method: Currently, a TAG does not exist for Riverside. To obtain a TAG, a group must contribute a matching share to the project. This match must equal at least 20 percent of the total cost to retain the technical advisors. This match usually is not difficult to provide: most groups make their match by donating volunteer hours and other "in-kind" services. Sometimes, EPA can waive the matching-share requirement or require a group to contribute a smaller match.

5.2.23 Technical Assistance Services for Communities

Description: The national TASC program provides independent assistance through an EPA contract to help communities better understand the science, regulations, and policies of environmental issues and EPA actions. Under the TASC contract, a contractor provides scientists, engineers, and other professionals to review and explain information to communities. The services are determined on a project-specific basis and provided at no cost to communities.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT

Goal: To support community efforts to become more involved and work productively with EPA to address environmental issues. The TASC program benefits communities by explaining technical findings and answering community questions, helping them understand complex environmental issues, and supporting their active roles in protecting healthy communities and advancing environmental protection. The TASC program can also provide opportunities for environmental education, bring diverse groups together and help them get more involved, and offer training and support environmental employment opportunities through the SuperJTI.

Method: Currently, a TASC does not exist for Riverside. Communities may contact EPA Region 2 TASC Coordinator to initiate a TASC. Requests are evaluated against a number of criteria to determine if technical assistance can be provided.

5.3 EVALUATION OF OUTREACH

In order to assess the effectiveness of the community involvement and outreach efforts, EPA may employ several tools to periodically evaluate messages, modes of communication, tools, and outreach activities. Evaluations allow understanding of successes and weaknesses, and it will enable the agency to retool strategies, as appropriate, to better serve the public. This CIP will be reviewed and revised, as necessary, to reflect project progress and changes to community needs, concerns, issues, and contacts.

Following interactive activities, such as public meeting or information session, EPA may conduct a basic internal analysis, which involves assessing the ease of logistics, the number and representation of attendees, and the appropriateness of information (i.e., was it sufficient to answer questions). The agency may also employ surveys and interviews to gauge public perceptions at various stages of cleanup. These may be conducted in person, via the Internet, or over the phone.

Subject to Attorney Client, Work Product, Deliberative Process and/or Joint Prosecution Privileges
FOIA/OPRA Exempt – PRELIMINARY WORK PRODUCT