West Lake Engagement Strategy

Draft – 8/26/2014

Update - 9/2/2015

Purpose:

The purpose of this strategy is to provide a framework for communications with all stakeholder groups in the area surrounding the West Lake Landfill Superfund Site. These communications will serve to inform stakeholders about site conditions and engage stakeholders in site-related communications as work progresses toward selection and implementation of a final remedy for the site. This strategy reflects the precepts and directives stated in EPA's Community Engagement Initiative (http://www.epa.gov/oswer/engagementinitiative/), and expands upon the elements of the Community Involvement Plan developed for the Site.

Background:

The West Lake Landfill (WLL) site is located on a 200-acre parcel about 1 mile north of the I-70 interchange within the city limits of Bridgeton, Missouri. The site is comprised of two (2) operable units (OUs). OU1 contains a mixture of radiologically impacted material (RIM), municipal refuse and construction/demolition debris. OU2 includes several sanitary landfill cells containing municipal refuse and construction/demolition debris.

In 2008, EPA signed Records of Decision (RODs) for OU1 and OU2, which selected capping as the remedy to contain the RIM, as well as groundwater monitoring and land use controls. Due to community concerns and subsequent review comments from the NRRB, EPA negotiated agreements with the PRPs to gather additional data to support further evaluation of remedial alternatives. Currently, there are six work plans pending approval for additional FS work.

Further complicating site progress is an ongoing subsurface smoldering event (SSE) at the adjacent Bridgeton Municipal Landfill, which was confirmed in 2012. MDNR has authority over the landfill and has required the owner to install a complex monitoring and gas extraction system to control odors stemming from the smoldering waste beneath the surface of the landfill. The intricate monitoring network demonstrates that the smoldering event is more than 900 feet away from the RIM in OU1.

In 2012, the Missouri AG ordered Republic Services to separate the RIM from the SSE, and in 2013 the PRPs agreed to install an isolation barrier. Under EPA oversight, the PRPs have conducted Gamma Cone Penetrometer Testing (GCPT) to locate the extent of RIM in order to support selection of an alignment for an isolation barrier. In addition, EPA has signed an

agreement with the USACE to acquire their expertise in evaluation of construction options for such a barrier. A report containing the evaluation of options for an isolation barrier is expected from the USACE in September 2014. Decisions regarding placement of a barrier are expected to be made by the end of 2014.

With the onset of the SSE came heightened community concern and fear about the RIM at the WLL site. A Community Advisory Group (CAG) was formed in 2013 to foster communications between EPA and the local community. While the CAG represents a group of concerned citizens in and around Bridgeton, it does not represent the larger populace that may be affected by decisions regarding long term cleanup at the site. For that reason, an expanded engagement strategy is needed to ensure that all stakeholders are informed and engaged, as envisioned by the NCP.

Scope:

This strategy lays out a framework of engagement opportunities with various stakeholder groups including, but not limited to, the following:

- Citizens of Bridgeton and surrounding communities
  - CAG
  - Homeowner Associations
  - School Board/Parent Teacher Leagues
  - Religious/civic organizations
- Businesses
  - Chamber of Commerce
  - Earth City Business Park
    - VRABEC
    - Hussman
    - Others
- Local Government
  - Bridgeton City Council
  - St. Charles City Council
  - St. Louis County Council
  - St. Charles County Council
- Local Authorities
  - St. Louis Airport Authority
  - St. Louis Emergency Management
  - St. Louis Health Department
  - Bridgeton Fire Department
  - Pattonville Fire Department

- Federal Elected Officials

In general, engagement opportunities include public and private meetings, conference calls, provision of informational outreach materials, and opportunities to review site documents posted to EPA's webpage. In addition, there are opportunities for digital engagement via EPA's webpage, Facebook, Twitter, and Scribd.

Engagement Framework:

This section includes a narrative description of engagement opportunities with each of the main stakeholder groups. In addition, Table 1 illustrates the proposed engagement framework and identifies EPA lead personnel, key players, and resource implications.

1. **Citizens of Bridgeton and surrounding communities**

   a. CAG

   A Community Advisory Group (CAG) was established for the WLL Site in 2013. The CAG has a formal charter with an elected board, and hosts regular meetings for the local community. EPA engages with the CAG through a variety of mechanisms. EPA staff attend the meetings in Bridgeton, provide written responses to questions submitted by the CAG, provide presentations as needed, and may engage in a verbal Question & Answer sessions at CAG meetings. In addition, EPA staff engage with citizens through email correspondence.

   EPA also funds a technical support contractor through the Technical Assistance Support for Communities (TASC) program managed by EPA's Office of Solid Waste and Emergency Response. The TASC contractor works with the CAG to identify informational needs and develops fact sheets and presentations as requested by the CAG. The TASC contractor also attends monthly CAG meetings and assists the CAG in formulating its questions to submit to EPA.

   ATSDR and USACE routinely attend the monthly CAG meetings, and may provide presentations or informational materials on occasion. Both agencies frequently respond to questions that arise during the CAG meetings, and interact with community members following the meetings. Under an IAG with EPA, USACE provides a written trip report summarizing each CAG meeting.

   To enhance communications with the CAG, periodic planning calls are recommended to clarify any lingering questions from the last meeting and to

discuss agenda topics for the next meeting. The TASC contractor may also participate in these calls.

b. Homeowner Associations

EPA has engaged with one area homeowner association. Generally, these groups may not be represented on the CAG, and may have information needs that are not currently known. It is recommended that EPA identify additional homeowner associations in the area to provide site-related information via email. Additionally, EPA staff may attend periodic homeowner association meetings as requested and as budget conditions allow.

c. School Board/Parent Teacher Leagues

Many CAG members have school aged children and routinely express concern about children playing outdoors, and evacuation procedures in the event of an emergency. Engaging with the school board and/or parent teacher organizations may provide another avenue to inform local citizens about the site.

d. Religious/Civic Organizations

Local religious or civic organizations may provide another avenue to inform local citizens about the site. At a minimum, these types of local organizations can be added to EPA's email distribution list for dissemination of information.

2. Businesses

a. Chamber of Commerce

EPA staff will contact the Chambers of Commerce in the surrounding area to poll interest and ideas for engagement with the local business community. At a minimum, Chambers may be added to EPA's email distribution list to receive the WL Update and other informational materials generated by EPA.

b. Earth City Business Park

To date, EPA has engaged with a few local businesses including the Earth City Board of Trustee, VRABEC and Hussman. The Earth City Board of Trustees represents the businesses and property owners within the business park. Given the number of people who work in this area every day, it is important that they have accurate information about the site, and they understand when they have opportunities to provide comments about EPA's decisions at the site. In addition, a site fact sheet should be developed on a quarterly basis and provided to the businesses or to the Earth City Business Park to keep its tenants informed.

If businesses request EPA staff to attend meetings, every effort will be made to schedule these meetings during a trip for a CAG meeting so as to conserve travel funds. Alternatively, EPA staff located in the St. Louis area may be able to cover these meetings, or EPA staff from KC may attend via video conferencing.

3. **Local Government**

Representatives from Bridgeton City Council, St. Louis County Council, and St. Charles County Council routinely attend the CAG meetings. At least one of these organizations has requested EPA and the USACE to attend a council meeting to provide information about the site. It is recommended that EPA contact the various city and county councils and offer to attend the council meetings on occasion. In addition, EPA should provide updated site information to the city and county councils on a periodic basis (ie quarterly fact sheets). As elected officials representing their local cities and counties, it is important that city and county council members have accurate information in order to best represent the interests of their constituents.

To the extent possible, EPA will attend council meetings during monthly trips to St. Louis for the CAG meetings in order to conserve travel funds. Alternatively, EPA staff located in the St. Louis area may be able to cover these meetings, or EPA staff from KC may attend via video conferencing.

4. **Local Authorities**

a. St. Louis Airport Authority

EPA has been engaged with the SLAA for several years regarding alternatives for long term remediation of the WLL site. The SLAA has a legal interest in any action that disturbs the surface of the landfill, due to the threat of bird strikes on aircraft. Inclusion of the SLAA in the remedy selection process is critical for public safety and for selection of a workable solution for the final remedy at the site. Engagement with the SLAA will primarily be achieved through periodic meetings, conference calls, and correspondence.

b. Emergency Management Authorities

To date, EPA has engaged with St. Louis County Emergency Management for the development of a contingency plan. While authority for local emergency response remains at the local level, it is recommended that EPA continue to engage with the emergency management authorities to maintain open lines of communication, which will be beneficial during any real response scenario. EPA can accomplish this engagement through periodic conference calls and sharing of information via email.

Additionally, EPA has engaged closely with the Pattonville Fire Department regarding the offsite air monitoring network being operated by EPA. This relationship should

continue to be fostered, and EPA staff should work to keep the local authorities informed of the capabilities and limitations of the monitoring network, and any significant data results.

5. **Federal Elected Officials**

   EPA has maintained regular contact with the federal elected officials (Senator Claire McCaskill, Senator Roy Blunt, and Congresswoman Ann Wagner) whose districts encompass the West Lake Landfill Superfund site. EPA will continue regular formal and informal communication with these officials and their staffs. Regular telephone update briefings will be offered to the officials monthly, or as necessary depending on site activities.

Engagement Tools and Platforms:

- WL Update – newsletter format providing relevant updates to interested stakeholders. EPA publishes this product to Scribd, posts it on the web, emails it to Congressional and elected officials, emails it to the CAG and expanded distribution list, and promotes via social media channels.
- WL Webpage – EPA maintains an updated webpage dedicated to the WLL site. Technical documents, fact sheets, press releases, and correspondence are posted on the webpage.
- CAG meetings - EPA attends monthly CAG meetings, provides written responses to questions submitted by the CAG, and provides presentations as requested. EPA also funds a technical assistance contract to assist the CAG in understanding complex technical issues.
- Presentations – EPA prepares and delivers presentations at CAG meetings and other meetings upon request. It is recommended that EPA prepare educational presentations about the remedy selection process, risk assessment, radiological risks, and WL Site Facts. These presentations can be used to educate a wide range of audiences including CAG, other citizen groups, city or county councils, businesses, etc.
- Fact Sheets – Numerous site specific fact sheets have been developed and are posted on EPA's WL webpage. It is recommended that updated fact sheets be developed quarterly for distribution to all stakeholder groups.
- Webinars – EPA should consider scheduling webinars for delivery of the presentations noted above.
- Videos – EPA may post brief videos on EPA's Youtube channel providing "in the moment" footage of site activities. Links to these videos would be posted on EPA's WLL webpage and promoted via social media channels.

- Business meetings – EPA may attend periodic meetings or calls with local businesses to provide accurate and updated information about the site.
- City and County Council meetings - EPA may attend periodic council meetings to provide accurate and updated information about the site.
- Citizen group meetings – EPA may attend meetings hosted by groups such as homeowner associations, school boards, parent teach leagues, religious or civic groups.

The table below provides additional detail regarding engagement tools or products, including the organization or lead for producing the product and the general timing of release for each product.

Product	Lead	Schedule	Delivery Format
WL Update	OPA	Periodic	Web, email, SM
WL Path Ahead	OPA	Periodic	Web, email, SM, poster board for meetings
Fact Sheets	OPA, TASC	Quarterly	Web, email, SM, hard copy delivered at meetings
Presentations	OPA, USACE, TASC	Periodic	CAG meetings, other meetings with businesses or city councils, posted to web as appropriate, webinars?
Videos	OPA	Periodic	Web, SM, meetings
Site Maps-posters	OPA	Periodic	meetings

Reporting and Metrics:

Engagement events will be tracked in a spreadsheet or similar format. The spreadsheet will provide the basis for a quarterly progress report prepared for EPA management. In addition to describing the engagement events completed during the quarter, the progress reports will contain metrics or analytics (eg number of views, likes, comments etc) that will reflect the levels of engagement achieved, and will serve as a guide for planning future engagement opportunities.