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TRANSMITTAL LETTER FOR U S EPA REGION IV COMMENTS ON DRAFT COMMUNITY  
RELATIONS PLAN NAS JACKSONVILLE FL  
3/27/191  
US EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

MAR 27 1991

4WD-RCRA&FFB

Mr. Joseph G. Wallmeyer, Director  
Environmental Division  
NAS Jacksonville  
Jacksonville, FL 32212-5000

RE: Jacksonville NAS NPL Site  
Jacksonville, Florida

Dear Mr. Wallmeyer:

I received the draft Community Relations Plan (CRP) for the subject site on March 11, 1991. It has been reviewed by Ms. Shirley Jones, our Community Relations Coordinator, and myself. We would like to offer the following comments on the draft CRP:

GENERAL COMMENTS

The CRP is a tool, required by law, to outline a method by which the lead agency at a Superfund site can ensure public participation and adequate information dissemination. The document belongs to the public. It outlines their concerns and gives recommendations on effective communication tools. The draft CRP has an outline of potential activities, but invariably qualifies proposed activities in terms of "if necessary". Many of these activities should be planned at this point. In addition, the draft CRP does not distinguish who will determine if the activity has become "necessary". The document also states that meetings or speakers will be provided "if requested". This statement would seem to indicate that these meetings or speakers are available on command. Was this the intent of those statements? It is important to remain responsive to citizen requests, however, it may become difficult to provide effective community relations activities on demand. Overall, the CRP covers many of the activities suited to Superfund sites. It does not, however, provide an adequate plan for implementing them. The following specific comments should help to clarify EPA's concerns with the draft document.

SPECIFIC COMMENTS

1. Page 1-1, 4th paragraph, 2nd sentence - Public involvement begins at the time of ranking on the National Priorities List (NPL) and continues through deletion from the NPL.
2. Page 1-1, 4th paragraph - Please delete "Citizens may comment during formal comment periods". Citizens may comment at any time. The statute requires Lead Agency consideration of citizen comments at certain points in the Superfund process, it does not preclude community involvement at other times.

- ✓ 3. Page 1-1, 4th paragraph - Please change the following sentence "These fact sheets will be mailed to local homes, businesses, and political leaders." to read "These fact sheets will be mailed to all interested parties on the site mailing list."
- ✗ 4. Chapter 2 should be moved to the appendices. Portions of Section 2.4 might be appropriate in the introduction, however, the rest of the chapter should be relegated to a location in the document after the discussion of community concerns and the activities to address them.
- ✓ 5. Page 5-1 - Community Relations activities should begin prior to initiation of RI activities at an Operable Unit. The CRP should be finalized and placed in the information repository, a fact sheet on the final Work Plan should be prepared and distributed, and a public meeting or availability session should be held to inform the public of the Work Plan contents. Additionally, a formal or informal meeting should be held with the residents of the nearby base housing areas. These people deserve special attention due to their proximity to certain areas covered under the Work Plan.
- ✗ 6. Page 5-1, 1st 2nd, and 4th bullets - These can all be combined by preparing the fact sheet on the Work Plan (this would include general information on the Superfund program as well) and conducting the public meeting.
- ✓ 7. Page 5-1, 3rd bullet - The mailing list should be updated constantly. Every public meeting or other community relations activity will result in additions to the mailing list. Anyone writing or calling with questions concerning the Superfund activities should be added to the mailing list. Changes in local community group leadership and politics should also be reflected in the mailing list.
8. Page 5-1, 5th bullet - Every public meeting or other community relations activity should be announced via a press release. In addition to press releases, public notices should be placed in the appropriate newspapers to notify the public of community relations activities. These should be placed a minimum of two weeks in advance, give all the pertinent information on location, time, etc., and should run more than once.
- ✓ 9. Page 5-1, 7th bullet - Remove "when necessary". It states here "Presentations will be made to as many interested and affected groups as possible and upon request". What kind of presentations? Which "affected groups"? Upon request? This is an interesting idea for providing information, however, it is unclear how and by whom it will be implemented.

Expand  
on 4.2

~~10.~~ Page 5-1, Section 5.2 - At a minimum, an availability session should be planned for completion of the RI activities. This would include a fact sheet, press release and public notices. At Op unit 1 of the site it should also include a special meeting for the residents of the adjacent housing area. If outside community interest increases or is high throughout the RI process a regular public meeting is warranted.

~~11.~~ Page 5-2, 4th bullet from top - What is meant by "continue to respond to speaking opportunities"? Who would be the speaker? Would EPA and FDER be involved? How? How would the facility determine who they would provide with a speaker?

~~12.~~ Page 5-~~3~~<sup>2</sup>, 3rd bullet - See comment 11.

~~13.~~ Page 5-~~3~~<sup>2</sup>, Section 5.4 and 5.5 - Completion of the Feasibility Study Report and the Proposed Plan should be discussed together to better reflect the statutory requirements for public involvement. The Record of Decision can be discussed separately.

The following activities must be conducted at the completion of the feasibility study:

~~X~~ The administrative record and index must be made available for review and comment by the public.

~~X~~ The proposed plan and supporting information must be prepared and placed in the administrative record.

✓ Publish a notice of availability and a brief analysis of the proposed plan in a major local newspaper of general circulation.

✓ CERCLA/SARA requires a minimum 30 day public comment period with the potential for a thirty day extension upon timely request. It is my understanding that, because the facility is also regulated by RCRA a 45 day public comment period may be required.

✓ 14. Page 5-2, Section 5.5, 1st bullet - This should be done at least two weeks prior to the public meeting.

✓ 15. Page 5-2, Section 5.5, 2nd bullet - This should be rewritten to state: "Hold a public meeting to present the FS, the proposed plan and to announce the start of the public comment period. A transcript of the public meeting will be made (preferably an official transcript, i.e. a court reporter) and the transcript will be made available to the public."

~~16.~~ Page 5-3, 2nd bullet from top - Remove this bullet.

17. Page 5-3, Section 5.5 - The following activities are associated with the Record of Decision (ROD):

Upon the close of the public comment period, the lead agency will prepare a written summary of significant comments, criticisms, and new relevant information submitted during the public comment period and the lead agency response to each issue. This responsiveness summary shall be made available with the record of decision.

✓ Place the signed ROD in the public repository.

✓ Publish a public notice after the ROD is signed notifying the public of its availability.

~~18.~~ Page 5-3, Section 5.6, 2nd bullet - The CRP should be reviewed at this time to determine whether it should be revised to describe further public involvement activities during RD/RA that are not already addressed or provided for in the CRP.

✓ 19. Page 5-3, Section 5.6, 4th bullet - A fact sheet on the completed remedial design is required under the statute. This is, therefore, not an "and/or" activity. Additionally, a public meeting or availability session should be scheduled to discuss the Remedial Design and present the schedule for remedial action.

✓ 20. Page 5-3, Section 5.7, 3rd bullet - How is the community going to be updated through naval air station publication articles? Is this a widely read publication outside of the facility? If not, the community off-base should also be provided information concerning the Superfund activities.

✓ 21. Page C-2 - The mailing list for Federal Agencies should include Shirley Jones, Community Relations Coordinator and myself. Please delete Mr. Neville's name from your mailing list. Please also add Mr. Hagan Thompson, Public Affairs Office at the Region 4 address.

✓ 22. Page C-3 - Please add Mr. Eric Nuzie in the FDER main office to the mailing list.

23. Page C-5 - The mailing list seems to be somewhat weak in that there are only five "regular" citizens listed. All the other names on the mailing list appear to be in politics,

government, local business, or a representative of an organized citizen's group. Without a more thorough discussion of the citizen groups in the area, it is imperative that the facility reach the public, in case the citizen group does not. Were these the only citizens interviewed? At least 20 private citizens should be interviewed to cover an adequate cross-section of the nearby population.

- ✓ 24. Page D-2 - Any public meetings or availability sessions should be held off the facility in an easily accessible meeting room.
- ✓ 25. Page E-3, top of the page - The reference here to a 3-week comment period is wrong. It should be a minimum 30 day comment period.

If you have any questions concerning these comments, please call me at (404) 347-3016.

Sincerely,



Michelle M. Glenn  
Senior Project Manager

cc: Shirley Jones, CRC  
Eric Nuzie, FDER  
Joel Murphy, SOUTHNAVFACENGCOM