

Department of Toxic Substances Control  
Public Participation Manual

CHAPTER 2  
OVERVIEW OF THE  
PUBLIC PARTICIPATION PROGRAM

# Chapter 2 ♦ Public Participation Process

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# Overview of the Public Participation Program

## Overview

Public Participation is an integral part of the site mitigation and hazardous waste management processes, and is the responsibility of each DTSC employee who has a role in DTSC's decision-making process. DTSC's experience has clearly shown that a well-planned public participation program, fully integrated into the overall technical program is a key factor in successful site remediation, corrective action, permitting and other DTSC activities where statute, regulation or policy requires public outreach. Moreover, communities that are involved early and throughout the decision-making process may be more trustful and supportive of the process.

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## Roles of Public Participation and Public Relations

DTSC's public participation program is not a public relations tool in the sense that public relations is "one-way" communication. It is DTSC's policy to create a dialogue with all stakeholders to ensure that their concerns and priorities are incorporated into each project. DTSC policy mandates a proactive public participation program that encourages community involvement by providing for the free flow of information to and from the community, as well as identifying and considering community concerns.

Public participation is designed to:

- ◆ Establish an ongoing two-way communication process that provides information in a manner comprehensible to the layperson;
- ◆ Ensure response to questions and concerns in a responsive and timely fashion; and,
- ◆ Take public concerns into account when final decisions are made on projects.

DTSC staff, contractors, responsible parties and others conducting public participation activities required by and/or overseen by DTSC should always bear this distinction in mind. The role of DTSC staff is readily discernible by interested community members, and it is important that they understand that the role of the Public Participation Specialist is to initiate and maintain a two-way conversation.

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## Risk Communication

If the program is to achieve maximum effectiveness, the public must be informed early and consistently throughout the process, and DTSC must remain open to public input. For DTSC, its contractors and the regulated community to fully evaluate public input, there must be an understanding that the public's definition of risk may not fully correspond to the scientific community's evaluation of risk. Factors such as control over decision making; mistrust of government and industry; long-term, non-health related effects such as property values, traffic and noise are not part of health risk assessments. Recognizing these factors will assist DTSC in addressing community concerns. In light of this, it is vital that DTSC staff members make early and concerted efforts to ensure that the regulatory and public involvement processes are explained to the community.

It is DTSC's policy that the public is involved early and continuously in its decision-making process. To determine the level of community interest, it will be necessary in most cases to conduct some form of community assessment. The most thorough form of community assessment is a Public Participation Plan, which is in effect DTSC's contract with the community on how and when communication will take place. As communities are fluid, the Public Participation Plan is considered a "living" document, one that changes as the level of and need for public involvement changes. With public input, the Plan should be reviewed and updated as necessary to ensure it meets the community's needs.

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## Environmental Justice

Communities have and will continue to raise the issue of environmental justice. While environmental justice must be defined by the affected communities, the issue generally refers to inequitable existence of environmental risks in communities with a high proportion of low income and/or minority populations. These communities are demanding that DTSC consider environmental justice in its allocation of resources and in its decision-making process. Often these communities raise the issue of "cumulative impacts" (multiple sources or multiple chemicals), which refers to the health and other social impacts of numerous industrial facilities (within and without DTSC's regulatory jurisdiction), hazardous waste sites, and other potential sources of pollution. In fact often the concern includes "multiple sources" many of which may not be under DTSC's regulatory control. These issues are complex and often inter-related, and require the interaction of several government agencies at all levels. It makes good sense for DTSC, in its community assessment, to consider this and determine the necessary level of involvement from other agencies, not just in terms of DTSC's decision-making, but also in terms of questions and concerns that will be raised by community members.

Remember: All Californians are entitled to a clean environment, and have a right to information concerning decisions that affect their health and their community. DTSC recognizes that all Californians have a stake in the outcome of its decisions, and therefore shall take all necessary steps to ensure that communities have the opportunity to participate in the decision-making process. DTSC shall make decisions that take into account the concerns of all communities, and its decisions shall be non-discriminatory.

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## Electronic Communications

During the past five years, the use of electronic communications (email and the Internet) has expanded greatly. Today, a significant portion of the public has access to a computer that is in turn linked to the World Wide Web. For many, electronic communication is the preferred method for transmitting and receiving information. Electronic communication is faster, cheaper and more environmentally sensitive than many other forms of communication.

Electronic communications affect a number of public participation activities, including:

- ◆ fact sheets
- ◆ public notices
- ◆ other written communications
- ◆ repositories
- ◆ response to comments documents
- ◆ public comments
- ◆ posting of documents

The following policy statements apply to DTSC's outreach efforts:

#### Community Assessment

During the community assessment phase (profile, survey, public participation plan) an evaluation of a community's ability to utilize electronic communication should be conducted.

#### Public Notifications

All products such as Fact Sheets, Public Notices, Legal Notices, or other such Notifications that are produced or overseen by DTSC must be placed on DTSC's web site. Contact your public participation specialist for instructions on how to place the document on the web site.

#### Repositories

The Public Participation Specialist should consider the community's ability to access key decision-making documents via the Internet. DTSC's web site can serve as a virtual repository for many types of information, including key decision-making documents, which are normally placed in a repository. General information about DTSC, regulations, statutes, policies and procedures, processes, information on risk assessment and links to a wide variety of information can help the public obtain a better understanding of a project. Consideration should always be given about the ability to place key documents on the web site.

Note: a "virtual" repository should not replace the need for a physical repository located within a community.

#### Public Comments

DTSC will accept electronic comments submitted during a public comment period. Fact sheets, notices and other informational material should indicate the ability for the public to submit electronic comments, and provide an e-mail address for the DTSC contact.

#### Response to Comments

Every effort should be made to provide electronic copies of response to comments documents to those who request this form of communication.

#### General Issues

Use of electronic communication will continue to evolve. DTSC staff should always seek innovative methods of utilizing electronic communication in order to provide the public with information. As cost permit, teleconferencing, Internet "live feeds" and other forms of electronic communication may be possible to communicate with the public.

Despite a growing trend toward this form of communication, many individuals and groups may not have access to the Internet or a computer. In the interest of serving the entire public, electronic communication can not replace more traditional information tools.

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### Public Participation Benefits the Technical Programs

Effective public participation is of great benefit to the technical aspects of DTSC's program, because:

- ◆ Information collected during public participation activities assists DTSC in making more informed decisions about sites and facilities;
  - ◆ Providing information to the community about the site and engaging in serious discussions about that information reduces the potential for delays that might arise if the community objects or does not understand a DTSC action or decision;
  - ◆ Providing opportunities for the community to get to know and interact with project staff helps establish and maintain DTSC credibility within a community; and,
  - ◆ Establishing and maintaining communication with the community, local officials and relevant government agencies helps DTSC to ensure that critical site or facility information is disseminated in an accurate and timely manner.
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### Public's Right to Information

A final, fundamental factor to keep in mind while engaged in a decision-making process is that the public has a right to information that affects its quality of life. DTSC is committed to an open and constructive communication process.

The Public Records Act, Government Code § 6250 et. seq., declares that "access to information concerning the conduct of the people's business is a fundamental and necessary right of every person in this state."

In 1986, the California Legislature declared:

*The Legislature has found that access by the people of this state to public records is a fundamental and necessary right. The Legislature finds that it is necessary to further the public's right to access to public records pertaining to hazardous waste management, information, and cleanup, to assure the fullest opportunity for public participation in permitting and other decisions in order to protect public health and the environment. (Health and Safety Code (HSC) § 25103)*

## Statutory and Regulatory Authorities

Several Federal and State environmental statutes and regulations require that public participation processes be conducted at hazardous waste sites and facilities. They are:

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CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980, known as the Federal Superfund or (CERCLA) (42 U.S.C.A. § 9601 <i>et seq.</i> ).
SARA	Federal Superfund Amendments and Reauthorization Act (SARA), (1986), which amended CERCLA (Pub. L. 99-499)
CERFA	Community Environmental Response Facilitation Act (CERFA), (1992). Amended CERCLA to facilitate the rapid identification and return to local communities of clean properties identified in the Base Realignment and Closure (BRAC) process (42 U.S.C.A. § 9620).
E.O. 12580	Executive Order 12580, (1987). Delegates to different departments and agencies, including DOD and DOE, specific responsibilities which have been assigned to the President under CERCLA/SARA.
RCRA	Resource Conservation and Recovery Act (RCRA), 1976, (amended in 1980 and 1984). Federal statute which regulates facilities that treat, store or dispose of hazardous waste (42 U.S.C.A. § 6901 <i>et seq.</i> ).
FFCA	Federal Facilities Compliance Act (FFCA) (1992). Amended RCRA to amend the waiver of sovereign immunity to ensure that federal facilities are subject to the requirements of RCRA to the same extent as private parties (See 42 U.S.C.A. § 6901 note).
40 C.F.R.	Title 40 of the Code of Federal Regulations (40 C.F.R.) contains the regulations promulgated by the United States Environmental Protection Agency (U.S. EPA), including those implementing CERCLA and RCRA.
NCP	National Oil and Hazardous Substances Pollution Contingency Plan (NCP). Sub-part E of the NCP establishes the procedures for responding to releases of the hazardous substances, pollutants and contaminants (40 C.F.R., § 300.1 <i>et seq.</i> ) The NCP was substantially revised in 1990. See 55 Fed. Reg. 8813, March 18, 1990.
NEPA	The National Environmental Policy Act (NEPA) (42 U.S.C. Sec. 4321 <i>et seq.</i> ) establishes an environmental review process that is separate from but similar to that under CEQA. However, NEPA applies only to federal agencies. A project is subject to NEPA when it requires permits, entitlements, or funding from a federal agency; when it is jointly undertaken with a federal agency; or when it is proposed on federal land.

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State and local agencies are encouraged to use NEPA documents to replace CEQA documents if the NEPA process is proceeding faster than the CEQA process and the NEPA documents comply with CEQA. The state or local agency may use the NEPA document without re-circulation if the NEPA document is circulated as broadly as required by CEQA, and if the agency gives notice that it intends to use the NEPA document.

A federal agency may use an Environmental Impact Report (EIR) conducted under CEQA to satisfy NEPA only if a state agency with statewide jurisdiction prepares the EIR for a federal grant project and the federal agency actively participates in the environmental review process.

The processes for CEQA and NEPA are similar, although public notification under CEQA is broader. If a federal document (an Environmental Impact Statement (EIS) or a Finding of No Significant Impacts (FONSI)) is to be used, the lead agency must give notice that it will use the federal document in place of an EIR or negative declaration, and that it believes that the federal document meets the requirements of CEQA. The notice shall be given in the same manner as the notice of the public availability of a draft EIR.

Before an environmental document is under way, DTSC and the federal agency should determine what process will be used, and have a clear understanding of the public participation activities that will take place during the process. If an EIS or FONSI is to be developed, public participation activities will follow the CEQA guidelines outlined in Chapter 6 of this manual.

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#### CEQA

California Environmental Quality Act (CEQA), (1970, amended in 1993). Requires state and local agencies to disclose and consider the environmental implications of their decisions, and to avoid or reduce the significant environmental impacts of their decisions whenever it is feasible to do so. (Public Resources Code, § 21000 et seq.). The State CEQA Guidelines, developed by the Office of Planning and Research and adopted by the Secretary for Resources, are binding on all state and local agencies (Title 14, CCR § 15000 et seq.).

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#### HWCL

Hazardous Waste Control Law (HWCL, (1972)). California's statute regulating the management of hazardous waste. Health and Safety Code, Division 20, Chapter 6.5 (HSC § 25100 et seq.)

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#### HSA

Reauthorization of H&S Code 6.8 - The Carpenter-Presley-Tanner Hazardous Substances Account (HSA), (1981). California's superfund program. Health & Safety Code, Division 20, Chapter 6.8 (HSC § 25300 et seq.) (Revised 1999)

## Health and Safety Code

The California Health and Safety Code, (Division 20, Safety Code “Environmental Health”) contains the State’s hazardous waste management laws. These laws include:

Chapter 6.5	Hazardous Waste Control
Chapter 6.6	Safe Drinking Water and Enforcement Act
Chapter 6.65	Unified Agency Review of Hazardous Materials Release Sites
Chapter 6.67	Above Ground Storage of Petroleum
Chapter 6.7	Underground Storage of Hazardous Substances
Chapter 6.8	Hazardous Substances Account
Chapter 6.9	Liability for Abatement of Hazards
Chapter 6.11	Unified Hazardous Waste and Hazardous Materials Management Regulatory Program
Chapter 6.95	Hazardous Materials Release Response Plans and Inventory
Chapter 6.97	Hazardous Materials Information and Consulting Services
Chapter 6.98	Environmental Quality Assessment

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## Title 22, CCR

Title 22, California Code of Regulations (CCR) (Div. 4.5) Environmental Health Standards for the Management of Hazardous Waste) details the regulatory requirements for the implementation of hazardous waste management statutes contained in the Health and Safety Code.

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## Roles and Responsibilities

The DTSC Public Participation Program is organized into four primary functions: headquarters operations, regional Hazardous Waste Management and Site Mitigation support operations, federal facilities operations, and school support operations. The entire public participation effort is directed by the Chief of Public Participation and Education (Chief). Each of the five regional units (two based in Sacramento) are supervised by a Public Participation Supervisor.

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### Chief

The Chief of Public Participation is responsible for the implementation of the DTSC public participation mission. The Chief directly advises hazardous waste management and site mitigation deputy directors as well as the Director’s office and Chief Deputy Director for External Affairs in matters pertaining to public participation. The Chief is responsible for the development of policy, procedures, guidance and training, tracking and reporting the branch budget, and ensuring all applicable Federal and States laws, regulations, and directives regarding public participation are followed. The Chief also manages the branch and supervises the Public Participation Supervisors.

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### Public Participation Supervisor

The Public Participation Supervisor is responsible to:

- ◆ Ensure that all applicable Federal and State laws, regulations, and directives regarding public involvement in hazardous waste management are executed at all sites and facilities in California;
- ◆ Advise DTSC site mitigation and HWM permitting management (branch chiefs and supervisors) in matters pertaining to public participation;

- ◆ Manage the Public Participation Unit's workload and budget, and provide supervision and support;
  - ◆ Manage the administrative support for the Public Participation Program;
  - ◆ Perform other duties of a Public Participation Specialist, when necessary.
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### Public Participation Specialist

The Public Participation Specialist works closely with each site/facility Project Manager, and is available to:

- ◆ Identify and plan appropriate public participation activities and techniques;
- ◆ Monitor and if resources are available, initiate public participation activities being conducted;
- ◆ Serve as an advisor to technical seniors and Branch Chiefs on issues of community concern and involvement;
- ◆ Coordinate with Project Manager;
- ◆ Elevate critical public participation issues through the Public Participation Specialist Supervisor;
- ◆ Ensure that all public participation requirements are being met; and,
- ◆ Provide direct input and oversight to ensure that the community outreach program is effective in achieving the intent of RCRA, CERCLA, and the NCP public participation provisions.
- ◆ Works directly with project proponents, responsible parties, and their consultants to ensure public participation activities are conducted as required and appropriate.

NOTE: The Public Participation Specialist may be assigned to coordinate all public participation activities at the more complex and controversial sites, while the Project Manager has review and approval responsibilities on technical activities. Although consultation with technical staff is required, the Public Participation Specialist has final review and approval for completeness and quality of public participation activities and documents, while the Project Manager is responsible to ensure all technical information in the public participation document is accurate.

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### Project Manager

The Project Manager oversees all activities conducted at the site/facility. In addition, the Project Manager must:

- ◆ Include Public Participation Specialist in initial project scoping and consult regularly with the Public Participation Specialist throughout the project.
- ◆ Work cooperatively with the Public Participation Specialist to ensure that appropriate public participation requirements of CERCLA, RCRA, CEQA, NCP, and DTSC policy are addressed either directly or through the Public Participation Specialist;
- ◆ Be familiar with all required and optional public participation activities and must be prepared to assist the Public Participation Specialist with public participation activities throughout the technical work on a site/facility if Public Participation Specialist resources are unavailable; and,

- ◆ Obtain Public Participation Specialist approval in all public participation activities and work products.
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### Headquarters Operations

HQ operations staff are responsible for developing policy, procedures, guidance documents, and training programs; evaluating programs; and analyzing resources. The HQ operations staff also provide informational materials and support services to regional operations and federal facilities and schools support staff. Other specific tasks conducted by HQ staff include:

- ◆ Weekly report
  - ◆ Monthly report
  - ◆ Maintenance of Public Participation Headquarters project files
  - ◆ Development and updating of strategic plan
  - ◆ Development of the annual work plan (or operational plan)
  - ◆ Contract management
  - ◆ Training
  - ◆ Planning
  - ◆ Tracking
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### Deputy Directors and Division Chiefs

Deputy directors and division chiefs for Site Mitigation, Hazardous Waste Management, and External Affairs work closely with the Chief of Public Participation to ensure that public input and concerns are considered along with technical issues prior to final project decisions. Deputy directors and division chiefs are responsible for actively setting a tone that encourages all staff to pursue DTSC's public participation philosophy, and to ensure that their branches integrate public involvement with technical programs, including early planning and adequate resources for new programs.

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### Branch Chiefs/ Unit Chiefs

Site Mitigation and Hazardous Waste Management branch chiefs and unit chiefs are accountable for knowledge and implementation of public participation requirements. These managers are key partners in working with the public participation supervisors and the Chief of Public Participation to resolve community issues and concerns pertaining to projects before those concerns become problems. Branch chiefs and unit chiefs rely on public participation experts to identify the needs of affected communities and provide advice on proactive public involvement.

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### Contractors

Public participation contractors can provide support services for many of the program tasks. However, contractors shall not represent, or appear to speak for, DTSC on policy issues before the public, other government officials or the media. The amount of contractor assistance and the division of responsibility between DTSC staff and the contractor will vary from project to project. DTSC staff shall work closely with contractors in delegating tasks, regardless of the type or level of support being given.

## Exhibit 1 - Public Participation Task Responsibilities

Activity	Public Participation Specialist	PPS, PM, or clerical support	Project Manager
<b>Community Profile</b>	<ul style="list-style-type: none"> <li>◆ Review Community Profile</li> <li>◆ Make recommendations for further assessment</li> </ul>	<ul style="list-style-type: none"> <li>◆ Prepare Community Profile for state-lead sites</li> </ul>	<ul style="list-style-type: none"> <li>◆ Request Community Profile from project proponents &amp; forward to PPS</li> </ul>
<b>Community Survey</b>	<ul style="list-style-type: none"> <li>◆ Develop survey questions</li> <li>◆ Review &amp; approve survey cover letter</li> <li>◆ Determine scope of distribution</li> <li>◆ Evaluate &amp; summarize the results of the survey</li> </ul>	<ul style="list-style-type: none"> <li>◆ Print &amp; mail survey</li> </ul>	<ul style="list-style-type: none"> <li>◆ Draft Community Survey cover letter</li> <li>◆ Review survey comments &amp; make recommendations</li> </ul>
<b>Community Interviews</b>	<ul style="list-style-type: none"> <li>◆ Identify needs for interviews</li> <li>◆ Identify interview scope</li> <li>◆ Identify language spoken</li> <li>◆ Prepare/approve questions</li> <li>◆ Conduct interviews</li> <li>◆ Review assessment summary (write for state-lead sites or permits)</li> </ul>	<ul style="list-style-type: none"> <li>◆ Schedule interviews</li> </ul>	<ul style="list-style-type: none"> <li>◆ Suggest interview participants</li> <li>◆ Review &amp; make recommendations on questions</li> <li>◆ Comment on summary</li> <li>◆ Participate in interviews, if necessary</li> </ul>
<b>Public Participation Plan</b>	<ul style="list-style-type: none"> <li>◆ Review &amp; approve (write for state-lead sites or permits)</li> </ul>	<ul style="list-style-type: none"> <li>◆ Prepare tables for state-lead sites or permits</li> </ul>	<ul style="list-style-type: none"> <li>◆ Review and comment</li> </ul>
<b>Mailing List</b>	<ul style="list-style-type: none"> <li>◆ Identify scope</li> <li>◆ Identify known contacts</li> <li>◆ Review &amp; approve mail list</li> </ul>	<ul style="list-style-type: none"> <li>◆ Gather data for mailing list</li> <li>◆ Enter into database</li> <li>◆ Update as needed</li> </ul>	<ul style="list-style-type: none"> <li>◆ Identify known interested parties/agencies</li> <li>◆ Acquire contiguous property owners and occupants list from RP or permit applicant</li> </ul>
<b>Fact Sheets</b>	<ul style="list-style-type: none"> <li>◆ Identify need/objective/scope</li> <li>◆ Edit/revise/finalize</li> <li>◆ Approve final</li> </ul>	<ul style="list-style-type: none"> <li>◆ Graphic design &amp; layout</li> <li>◆ Printing &amp; mailing</li> </ul>	<ul style="list-style-type: none"> <li>◆ Consult on need for a fact sheet</li> <li>◆ Prepare first draft of text</li> <li>◆ Provide additional info. as requested</li> <li>◆ Review, edit &amp; approve final document for technical accuracy</li> </ul>
<b>Public Notices</b>	<ul style="list-style-type: none"> <li>◆ Review &amp; approve ads</li> <li>◆ Identify media to use</li> </ul>		<ul style="list-style-type: none"> <li>◆ Prepare public notice/radio ad</li> <li>◆ Obtain bids</li> <li>◆ Prepare service authorization</li> <li>◆ Place ads as directed</li> </ul>
<b>Public Hearings/ Meetings</b>	<ul style="list-style-type: none"> <li>◆ Identify need/objective/time frame</li> <li>◆ Identify location</li> <li>◆ Develop agenda</li> <li>◆ Coordinate development of presentations for all participants</li> <li>◆ Review/approve presentations</li> <li>◆ Conduct dry runs</li> <li>◆ Approve graphic/handout text</li> </ul>	<ul style="list-style-type: none"> <li>◆ Make meeting room arrangements</li> <li>◆ Arrange for interpreter/court reporter, if needed</li> <li>◆ Prepare meeting supplies (sign-in sheets, name tags, comment forms)</li> </ul>	<ul style="list-style-type: none"> <li>◆ Coordinate w/PPS on meeting plans</li> <li>◆ Prepare presentations</li> <li>◆ Participate in dry runs</li> <li>◆ Coordinate with PPS on graphics</li> <li>◆ Participate in meeting</li> <li>◆ Develop graphic/handout text</li> </ul>
<b>Information Repositories</b>	<ul style="list-style-type: none"> <li>◆ Establish location</li> <li>◆ Identify documents to be included</li> <li>◆ Monitor status during project</li> </ul>	<ul style="list-style-type: none"> <li>◆ Inventory all documents sent to repository</li> <li>◆ Forward documents requested</li> </ul>	<ul style="list-style-type: none"> <li>◆ Identify documents to go into repository</li> <li>◆ Provide copies to library for inclusion</li> </ul>
<b>Response to Comments</b>	<ul style="list-style-type: none"> <li>◆ Provide input to Project Manager on organization &amp; scope of response to comments</li> <li>◆ Review response to comments for clarity &amp; responsiveness</li> <li>◆ Respond to comments on PP</li> <li>◆ Elevate community comments to DTSC management for consideration, if necessary.</li> </ul>		<ul style="list-style-type: none"> <li>◆ Write draft response to comments</li> <li>◆ Refer comments to other appropriate DTSC staff for draft responses</li> <li>◆ Distribute draft for final review</li> <li>◆ Finalize &amp; distribute the response to comments</li> </ul>
<b>Task Order Preparation</b>	<ul style="list-style-type: none"> <li>◆ Identify need/scope of work, budget</li> </ul>	<ul style="list-style-type: none"> <li>◆ Prepare task order</li> <li>◆ Track invoices/balances</li> </ul>	<ul style="list-style-type: none"> <li>◆ Coordinate with PPS on needs/scope of work</li> </ul>