Department of Toxic Substances Control

Public Participation Manual

CHAPTER 6

PUBLIC PARTICIPATION TASKS AND TECHNIQUES

Chapter 6 ♦ Public Participation Tasks and Techniques

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Department of Toxic Substances Control

Public Participation Manual

CHAPTER 6 SECTION A
Community Assessment Process

Chapter 6, Section A
Community Assessment Process

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Public Participation Tasks and Techniques

Section A ♦ Community Assessment Process

Overview

The community assessment process allows DTSC to consider potential community interest and informational needs at a hazardous waste facility or a site early in the technical process. Community assessment also helps DTSC to anticipate the nature of possible community concerns and inquiries, and respond appropriately to those inquiries.

There are several types of community assessment, which can be performed, depending upon what is already known about the community's level of interest, the significance of the site or permit action being proposed, and staff resources available. These include:

- **Community Profile** - Required during Preliminary Environmental Assessment process, (thumbnail sketch of community, newspaper articles), and provided by the Responsible Party.
- **Baseline Community Survey** - Required prior to commencement of remedial investigation to corrective action and closure projects. Evaluate potential interest in a project. Also done for facility permits.
- **Community Interviews** - Required prior to commencement of Remedial Investigation/Feasibility Study field work. Required for "high" community interest removal actions, facility permits, and RCRA Facility Investigation (RFIs).
- **RAPID Informal Assessment** - Used to informally and quickly determine the impacted community and its concerns during and after an accidental release of hazardous materials or waste.

The decision on what type of assessment is appropriate in a given situation is to be made by the Public Participation Specialist assigned to the project using the following guidelines.

The first step in the community assessment process is to do a rough evaluation of potential community interest at a given site/facility. (See Exhibit 6-1) To judge the level of community interest at a site/facility, project staff should review the following:

- ♦ Review DTSC files and records of public inquiries about the site or facility.
- ♦ Review DTSC public participation file, if one already exists. If not, this is the time to create a PP file.

A community profile is a report submitted to DTSC by a proponent/applicant under the Fee-For-Service or Voluntary Cleanup programs, or as part of the Preliminary Endangerment Assessment (PEA) process. The profile is used to obtain a "thumbnail sketch" of a community. This is necessary to evaluate whether public involvement activities are warranted at a given time and to identify sites or facilities with "high" community interest or concern early in the process. Refer to Exhibit 6-2, Community Profile Outline.

Responsibilities

Community Profile Task Responsibilities

Timing

The Preliminary Endangerment Guidance Manual (1994), requires that a community profile be prepared for each Preliminary Endangerment Assessment (PEA). However, California Assembly Bill (AB) 2655 (signed into law in September 2000) specifies that only school sites requiring further response actions beyond a PEA are mandated to comply with Superfund public participation requirements set forth in the California Health and Safety Code (HSC). Community Profiles are required by HSC Section 25356.1(h)(1). For all site mitigation sites, except school sites. The community profile should be submitted by the project proponent, along with their Preliminary Endangerment Assessment work plan. This profile must be reviewed by a Public Participation Specialist to determine what activities are warranted. Sites with "high" community interest or concern may require public participation support at this early stage.

In instances when a draft Preliminary Endangerment Assessment report is submitted to DTSC for review without prior review of the work plan, the community profile must be submitted with the draft document. In any case, the community profile must be evaluated by a Public Participation Specialist prior to its approval.

A community profile is also submitted to DTSC by a proponent under the Voluntary Cleanup program. This community profile is used by the Public Participation Specialist to help estimate the number of Public Participation Specialist hours that are necessary for the proposed project.

Community profiles for school sites with recommendations for further action should be prepared during the PEA Public Comment Period conducted by the school district. The school district should submit the community profile to DTSC for review and approval upon completion of the public comment period.

Exhibit 6-1
Community Interest Evaluation Worksheet

The following criteria can be used as general guidelines for evaluating whether the level of community interest is "high" or "low" for a specific project. No single answer will necessarily determine if a project is of high interest, rather the answers should be evaluated by the Public Participation Specialist and project manager as a whole. This determination is useful for developing an appropriate and responsive public participation program. These are only general guidelines and cannot replace a site-specific community assessment. Also, it should be recognized that community interest may change at any point during the site mitigation or hazardous waste management process. Therefore, the project staff and Public Participation Specialist should continually monitor community interest.

Project Type	"High" Interest Criteria	Yes	No
ALL	Site is close to residences, schools or businesses or other sensitive populations.		
ALL	Site may pose a risk to public health or the environment. There are obvious exposure pathways, such as ground or surface waters, dust, odors or prevailing winds, by which contaminants could reach humans or wildlife.		
ALL	Local community believes that the site may pose health risk.		
ALL	The community has demonstrated previous interest in toxics or other environmental issues.		
ALL	Local officials, citizens and other agencies are familiar with the project and have concerns.		
ALL	Site location has been the subject of a high level of public interest, as evidenced by media coverage or other community activity.		
ALL	Local communities are concerned that property values may decline because of the site.		
ALL	Local communities have a negative view of, or questions, DTSC credibility.		
ALL	There have been community inquiries, either to DTSC or other local agencies.		
ALL	There are numerous hazardous waste facilities or sites within one geographical location (e.g., city limits or particular neighborhood).		
ALL	The site may become an election issue or have political ramifications.		
HWMP	The application is for a land disposal closure or permit for retrofitting.		
HWMP	The application is for an incineration or boilers and industrial furnaces (BIF) permit. **NOTE:** It is the DTSC policy to classify ALL incinerator permit applications as "high" interest.		
HWMP	Permit applicant or facility has a poor reputation within the community.		
HWMP	The proposed technology (i.e., incinerator, landfill, commercial treatment & storage facility) has a negative reputation within the community.		
HWMP	The permit application is for a large, commercial treatment and storage facility.		

Exhibit 6-2 ♦ Community Profile Outline

All major headings and bullet items in Exhibit 6-2 should be addressed. Additional guidance is provided in the Exhibit in italic. Upon completion the Community Profile shall be submitted to the DTSC for review and approval by the Public Participation Specialist.

Site/Project Name: ___________________________________

Site/Project Description

- **Description of proposed project:** *What is the nature of the project? Are there suspected or known releases of hazardous substances? What are they? What is the stage of the project; PEA, site investigation? Is it a hazardous waste facility permitting/ closure project? Describe. Is it part of a larger site or facility? Is there a schedule for completion? What are the current /past business operations at the site?*
- **Location and size of site/project:** *Address and size of the site.*
- **Location of other nearby** *Cal/EPA or U.S. EPA projects, if known.*
- **Description of surrounding land uses and environmental resources including proximity to residential housing, schools, churches, etc.** *What is the current zoning/land uses for the site and for immediate surrounding land? Are there agricultural, wetlands or other environmental resources nearby? What is the nearest residence, school, day care center and other sensitive receptors? Are there planned changes in land use?*
- **Map:** *Provide a map of the site and immediate vicinity.*
- **Demographics of the community in which the site is located:** *Population, socioeconomic level, ethnic composition, specific language considerations (for possible translation of information), and the local government organization (city council, county board).*

Local Awareness and Interest

- **Does the community have any awareness of the project as a hazardous substance release or permitting facility? Have there been meetings, presentations, or other outreach efforts taken to inform the community about the site?** *Document any prior or current efforts undertaken to inform the community of the site.*
- **Contacts by community members:** *Have there been contacts or inquiries from individuals or groups regarding the site? (Include their names, phone number, and address on the Key Contact List.)*
- **Media coverage:** *Has there been any newspaper, magazine, or television coverage related to the site? (Include copies of articles, if available.)*
- **Government involvement:** *Has there been or is there currently any other government involvement with the site? City or county staff, elected officials, other regulatory agencies?*

Key Contact List

- Provide names, addresses, and phone numbers of key local officials including city manager, city/county planning department and environmental health department contacts, other involved agency contacts, and community members with whom there has been contact on the site including any environmental or other groups which may have potential interest in the site.
- **Provide a list of adjacent property owners and leasers/renters:** *These names provide the initial step in formation of the Department site mailing list.*

Key Issues and Concerns

- **Are there any specific concerns or issues raised by the community regarding the site or operational activities conducted at the site?** *Health concerns, property value concerns, land use concerns, other.*
- **Any anticipated concerns/issues regarding the site?** *If the community is unaware of the site, what are the anticipated concerns/issues.*
- **Level of concern:** *Is there or is there anticipated to be low or high level of concerns? Is significant controversy expected?*
- **Any general environmental concerns or other projects with high controversy in the community?** *Have environmental or other citizens groups shown interest in other sites or issues in the past? Which groups? What sites/issues? (See Exhibit 6-1)*
- How does the community wish to communicate? (or have the ability to) electronically? written? meetings?

Recommended Public Participation Activities

- **Recommend public participation activities beyond those required by regulation or law:** *Is some additional community assessment merited in your opinion? Is a Public Participation Plan in order? Do you anticipate the need for meetings?*

Department Public Participation Specialist Approval (signature and date)

Your name here (date)
DTSC Public Participation Specialist

Baseline Community Survey

Overview

A baseline community survey (also referred to as a community survey) is a process conducted by a Public Participation Specialist, utilizing questionnaires, display ads and telephone interviews, from Section 25358.7 (b). It is also an opportunity to introduce a project to a community and get some early feedback, including information on sensitive receptors. A baseline community survey cannot take the place of community interviews, which are necessary prior to the development of a Public Participation Plan.

Responsibilities

Baseline Community Survey Task Responsibilities

Timing

A baseline community survey can be performed at the earliest stages of a project. A baseline community survey also can be a useful tool to monitor community interest during the life of a project or evaluate the impact of a change in circumstances.

Community surveys are ideal for evaluating new projects to obtain a general idea of the level of community interest. For known "high" community interest facilities, community interviews should be conducted.

Techniques

- Develop project **mailing list** (refer to Chapter 6 D for guidance on mailing lists);
- Send out an **introductory letter** describing the proposed project, DTSC's role,

and public involvement opportunities. Include with the letter, a questionnaire asking about knowledge of, interest in, or concern about project, as well as how to best work with this community. (Refer to the Appendix, for a sample letter.); and,

- ♦ Review responses received to obtain feedback on community interest and/or concern. Consider number of responses received (10% is usually a good response to such a mailing), as well as the specific comments provided.

A written survey can be enhanced by the following methods:

Conduct a limited number of telephone interviews with key community leaders (usually 5-7 interviews will suffice) for additional information about community and issues. (Refer to Exhibit 6-6, for examples of telephone interview questions.)

Place a display ad in local newspapers, describing the proposed project, DTSC's role, and public involvement opportunities. Include a DTSC contact and a tear-out coupon which can be returned for additional information and to be added to the project mailing list.

In addition to these primary techniques, it may be useful to conduct a drive-by site/facility inspection to gather more information (particularly sensitive receptors) about the community.

Prepare a summary of information received from questionnaires, phone interviews, and/or display ads. From this, develop a public involvement strategy, which is responsive to needs identified by the community. This should include whether additional community assessment efforts are warranted as well as any other public participation activities that are anticipated for the project.

Community Interviews

Overview

Community interviews are individual, in-person interviews, conducted by the Public Participation Specialist and the Project Manager with community members, local officials, and other interested parties to:

- ♦ Identify the interested community;
- ♦ Obtain historical information about the site/facility;
- ♦ Assess community issues and concerns;
- ♦ Evaluate level of awareness about a project;
- ♦ Obtain an understanding of past community involvement in this or other similar projects;

- Receive input on how to best involve the community in the site mitigation or permit process; and,
- Begin to establish a relationship with local agency and community representatives.
- To meet the requirements of Health and Safety Code Section 25358.7, interviews cannot take the place of a community survey, or vice versa.
- Ability to send/receive electronic correspondence or access to the internet.

Responsibilities

Community Interviews Task Responsibilities

Public Participation Specialist	PPS, PM, or clerical support	Project Manager
♦ Identify need for interviews. ♦ Identify interview scope. ♦ Prepare/approve questions. ♦ Conduct interviews. ♦ Review assessment summary (write for state-lead sites or permit). ♦ Approve the list of interviewees.	♦ Schedule interviews.	♦ Suggest interview participants. ♦ Review and make recommendations on questions. ♦ Participate in interviews. ♦ Comment on summary.

Timing

Site Mitigation

Community interviews are the first step in the development of a Public Participation Plan. An approved Public Participation Plan must be in place before Remedial Investigation fieldwork can begin at a site. Interviews can also be done at any time during the site mitigation process, as needed, in order to evaluate changing community make-up, interests, needs or concerns.

HWM

Community interviews should be done for any “high” community interest facilities, when review of the Part B permit application begins or when corrective action is initiated. Refer to Exhibit 6-1, “High Community Interest Criteria”, for guidance on determining whether a facility is considered “high” interest. This determination may change for a facility at any time. The Public Participation Specialist is responsible for determining whether community interviews are necessary for a facility.

Preparing for Interviews

Community interviews are a time-intensive activity because of the large amount of organization required and time needed for interviews. While the level of effort will vary, schedule approximately four hours per interview for research and preparation, the interview itself, and follow-up activities.

Collect background information about the project and community. This information can be collected from other DTSC staff, newspaper reports, DTSC files, a drive-by of the site/facility, other agencies, and the permit application/closure plan.

Identify contact persons at interested organizations and local agencies. In addition to establishing the community's level of interest, project staff must identify the organizations, agencies and individuals that have been interested or involved in the site or facility related activities to date. This information can be obtained by reviewing the following materials:

- Newspaper clipping;
- DTSC's public participation file for the site/facility; and,
- DTSC telephone logs that record site- or facility-related public inquiries.

The Public Participation Specialist conducts the interviews with participation from the Project Manager and responsible party or site mitigation project proponent, if applicable or deemed appropriate by the Public Participation Specialist.

Develop a <u>list of interested parties to interview</u>. The project team must develop a list of community members to be interviewed, including representatives of those persons and organizations identified in the two steps above. Additional efforts should be made to identify those community members who are less vocal or visible, as they will provide additional perspectives and concerns about the site/facility that may not surface during interviews with more actively involved community members. DTSC policy requires the Public Participation Specialist to conduct and/or participate in the interviews. Project staff should accompany the Public Participation Specialist. Refer to Exhibit 6-5 "List of Individuals and Organizations to Interview".

Develop a list of interview questions. The interview is an opportunity for community members to express their concerns about the site/facility directly to DTSC, and to have input to the public participation planning process. The questions posed during the interview should, therefore, be open-ended in order to elicit the widest range of community members' concerns and experiences regarding the site/facility. Questions should be phrased so as not to be leading or biased.

Exhibit 6-6, contains a list of <u>standard interview questions</u> that may be used to guide the interview. This list is not all-inclusive and project staff should develop additional questions that will elicit site/facility-specific or community-specific concerns. For example, if the community has been suspicious or distrustful of local or state government actions or decisions in the past, questions should be asked that will supply DTSC with information on those events and the community's current attitudes toward local authorities. <u>Site/facility files will provide information with which additional interview questions can be developed.</u>

Arrange the Interviews

and business representatives are likely to prefer meeting in their offices during business hours, local residents and community groups may be available only during non-business hours. Meetings at their homes may be most convenient.

- The interviews may take place within a single community or over a large geographical area. It is important to plan ahead when scheduling the interviews and group them by geographic location to prevent backtracking throughout the day. Depending on the number of interviewees and their geographic locations, one or more days may be required to complete the interviews.
- Staff should allow for up to one hour per interview, plus time to travel to the next appointment. Appointments should be scheduled two to three weeks prior to the interview to allow time to send a letter confirming the date and time, reason for the interview, and topics to be discussed.
- Interpreter should be used when interviewing community members who speak a language other than English.

Conducting the Interviews

Explain Purpose

The Public Participation Specialist will begin the interview with a brief overview of the project, and explain that the primary goal of the interview is to obtain rather than disseminate information. The information gathered during the interview is used to assess community concerns, and to develop an appropriate public participation strategy. While DTSC staff may answer questions or provide a brief summary about DTSC activities and findings, the interview is not intended to serve as a formal briefing.

Assure Confidentiality

Explain that while the public involvement plan will be part of the project file, the plan will not attribute specific statements or information to any individual. Ask interviewees if they would like their names, addresses, and telephone numbers on the mailing list.

Identify Other Interested Parties

Ask the interviewees for names and telephone numbers of other persons who are interested in activities at the site/facility.

Determine Previous Outreach

Determine the interviewee's perception of past DTSC or site or facility public participation activities.

When identifying citizens' concerns about the site or facility concerns, consider the following factors:

- Threat to health or the environment

Identify Concerns About Site/ Facility

- Economic concerns
- Sensitive Receptors
- Agency credibility
- Community involvement
- Media coverage (local, state, national)

¨ Number of households/business affected

Future Public Involvement in Project

Explain the public involvement process, and ask the interviewees:

- How they would like to be involved and informed of the project progress (keep a list of individuals who wish to be kept informed);
- What is the best way to stay in contact;
- To recommend convenient locations for holding public meetings and setting up information repositories.
- Do they have the ability to send/receive electronic comments or access the internet?

Community Interviews Summary

Summary of community concerns should be written up at the completion of community interviews. This can be incorporated into the Public Participation Plan or, when no Public Participation Plan is required, can become the basis for a memo to file, outlining a public participation strategy for the project.

Exhibit 6-5

List of Individuals & Organizations to Interview

(** denotes must contact for interview)

- ** Residents located close to the site/facility
- ** Businesses located close to the site/facility
- Local chapter of the League of Women Voters
- Parent-Teachers Associations and school principals
- Chamber of Commerce
- Civic groups
- ** Appropriate City Council Member(s)
- ** City Planning Department
- ** County Supervisor(s)
- Statewide environmental groups
- University or community college leaders
- ** Representatives of State and local agencies such as the Regional Water Quality Control Board (RWQCB) and the Air District
- ** Representatives of the local Public or Environmental Health Department
- ** State legislators
- ** Federal legislators (federal legislators are only required at federal sites or RCRA facilities or NPL sites and should be considered at "high " profile state sites/ facilities).
- Local/Regional community or environmental groups
- ** Sensitive receptors (e.g., Hospitals, Schools, Parks, Day Care Centers)

Exhibit 6-6 ♦ Standard Community Interview Questions

History:

1. How long have you lived or worked in this area?
2. Are you familiar with the site/facility?
   a. Where have you received your information about the site/facility?
   b. How and when did you first become aware of the site/facility?

Concerns:

3. Do you have any concerns about this site/facility?
   a. If so, which of these are most important?

Involvement:

4. What do you know about the history of community involvement around this site/facility?
   a. Have you been actively involved with the site/facility in any way?
   b. Are you aware of any individuals or groups who have emerged as leaders on this issue?
   c. Do you feel they adequately represent your concerns?
5. Have you had any contact with local, state or other officials regarding this site/facility?
   a. If so, what was the nature of this contract?

Media:

6. Do you feel that the media coverage has presented an accurate picture of the situation:
7. Have you had any personal experiences with the media?
   a. Do you feel your concerns have been accurately reflected in media coverage?
8. Do you listen to news on the radio?
9. On what TV and/or radio stations do you get the news?
10. What newspapers do you take?

Level of Confidence:

11. Do you have confidence in the State's ability to: clean up this site or appropriately process the permit application/closure plan approval for this facility?

Communication:

12. Do you feel you have been kept adequately informed about the site/facility?
    a. What, if any, communication problems have you experienced in the past?
    b. If not, what other kinds of information would you like to be receiving?
13. What is the best way to provide you with information about the site/facility?
    ___Fact Sheets ___Community Meetings
    ___Workshops ___Advisory Committee
    ___Electronic messages (e-mail) ___Access to DTSC's web site
    ___Other (explain)____
14. Can you suggest a convenient location(s) for:
    a. Community Meetings
    b. Local Information Repositories
15. Can you suggest anyone else we may want to talk to?
16. Any other comments, suggestions or concerns you would like to add?

♦ ♦ ***Site/facility files will provide the information with which additional interview questions can be developed.*** ♦ ♦

Department of Toxic Substances Control

Public Participation Manual

CHAPTER 6 SECTION B
The Public Participation Plan

Chapter 6, Section B
The Public Participation Plan

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The Public Participation Plan

Public Participation Tasks and Techniques

Section B ♦ The Public Participation Plan

Developing the Plan

The purpose of the Public Participation (PP) Plan is to formally document community concerns regarding a site or facility, and to identify specific public participation activities which will be implemented to ensure the community is involved in the agency decision-making process.

NOTE: Community interviews must always be completed prior to the development of a Public Participation Plan, and the results of the interviews become the basis of the Plan.

Project staff should allow ample time for developing the Public Participation Plan, as it may take up to 9-12 weeks from the inception of the planning process to the completion of the draft Public Participation Plan, plus final review and approval time required of the Public Participation Specialist (PPS). (Refer to Exhibit 6-7, "Public Participation Plan Activities Checklist".)

The public will have access to the Public Participation Plan, which will be placed in at least one information repository in the community, and DTSC is expected to conduct those public participation activities prescribed in the Plan.

Responsibilities

Public Participation Plan Task Responsibilities

Public Participation Specialist	PPS, PM, or clerical support	Project Manager
♦ Review & approve (write for state-lead sites or permits) the Public Participation Plan.		♦ Review & comment.

Timing

Site Mitigation

The development of a Public Participation Plan will begin as soon as DTSC determines it is necessary. The Public Participation Plan must be completed by the contractor or Responsible Party and <u>approved by the Public Participation Specialist</u> before the remedial investigation fieldwork begins.

HWM

Consider the development of a Public Participation Plan for any "high" interest permit application/closure plan, and at the beginning of the corrective action process (RCRA facility investigation). For guidance on determining the community level of interest, refer to Exhibit 6-1, "Community Interest Evaluation Worksheet".

Elements of the Public Participation Plan

The Public Participation Plan documents DTSC's commitment to the community interested in the hazardous waste facility or site. The Public Participation Plan sets forth the actions which DTSC and the permit applicant will take during the course of the permit determination or closure to keep the community informed in a timely fashion, and to provide opportunities for community participation in the decision-making process.

- ♦ Introduction - Clearly explains the purpose of the document.
- ♦ Site/Facility History Background - Provides an overview of the site/facility, its technical and regulatory history, and a history of past community concerns and involvement in activities at the site/facility.
- ♦ Community Concerns - Summarizes any concerns identified during the community interviews.
- ♦ Objectives of the Public Participation Plan - Provides a narrative of the major objectives of the Plan. Objectives typically relate to the specific concerns outlined in the "Community Concerns" section of the Plan.
- ♦ Public Involvement Activities - Describes the specific activities that will be conducted to meet the objectives outlined in the "objectives" section of the Plan (e.g., meetings, fact sheets, briefings for local officials, etc.)
- ♦ Appendices - Can be included to provide the project mailing list, media contacts, and public meeting and information repository locations. (Mailing list should not be included within the PPP that are either distributed to the public or placed in the repository.)

Project staff should ensure that the Plan contains these elements, as required by DTSC policy. The Public Participation Specialist will not approve a Public Participation Plan, which does not contain all of these elements.

Interpreting Information

One of the goals of the Public Participation Plan is to present broad-based conclusions about the community's concerns and interests. The writer of the Plan should review site history, background information and comments obtained through interviews. The writer should then group the information into the appropriate (See Exhibit 6-8) categories. From the information in these categories, the writer may draw broad-based conclusions about community interests, and develop activities that will respond to community concerns.

While it is important not to extrapolate from what was said during the interviews to draw conclusions, project staff should try to interpret the core of community concerns from the interview notes. The writer should realize that she/he is drawing conclusions based on the interviews, and use terminology that reflects this (e.g., state that "some", "many", "few" or "one" person interviewed expressed that concern or belief).

It is extremely important to note that no community members are ever directly quoted in order to preserve the anonymity of the source.

Writing the Plan

Write the Public Participation Plan in active voice. The Plan should be written from DTSC point of view to the public, describing in direct language the activities to be conducted by DTSC or the Responsible Party (with DTSC oversight), and stating the opportunities for public involvement. In addition, the Plan must avoid technical language but, if technical language is necessary, the technical terms should be highlighted and defined in a glossary.

Approving the Plan

When the Public Participation Plan is prepared by a Responsible Party, proponent or contractor, the Plan shall be submitted to DTSC for review by the Project Manager and the Public Participation Specialist. (Refer to Exhibit 6-9, "Public Participation Plan Reviewer's Checklist".)

The final Public Participation Plan must be approved by the Public Participation Specialist prior to implementation. A signature line must be included on the cover page of the Plan for the Public Participation Specialist 's signature. (Refer to Exhibit 6-10, "Signature Page for Final Participation Plan").

The review cycle may take several months from the "draft" to "final" stage of the Public Participation Plan, depending on the complexity of the site/facility, the quality of the first draft and the number of other parties interested in the Plan and/or site/facility. Reviewers should be allowed two weeks to comment on the draft Plan, but the Project Manager may alert reviewers if a tight deadline is involved and request comments by a specified date.

Revising the Plan

Revision of all or parts of the Public Participation Plan for a project may be done in order to incorporate new information, reflect changes in community concern, and adjust public participation activities to meet these changes. A revision ensures that the Public Participation Plan remains sensitive to community concerns through all phases of the project. It can also evaluate which public participation activities are effective.

The process for revising a Public Participation Plan is similar to the process for writing the plan initially:

- ♦ Review new information obtained through new developments of the project, new community interviews, or information from other events;
- ♦ Evaluate how this new information changes the community concerns and recommended public participation activities; and,
- ♦ Revise and update the Public Participation Plan accordingly.

Timing

The Public Participation Plan should be reviewed and/or revised:

- ♦ When a significant change in community concerns or activities at a site/facility occurs; and,
- ♦ At least every two years for long-term projects.

Exhibit 6-7

Public Participation Plan Development Checklist

Project: ____

Lead: ___State ___RP ___DoD ___ U.S.EPA ___ Other______________________

Planning Meeting Date: _________ **Place:** ______________________________

Attendees: __________________ __________________ __________________

__________________ __________________ __________________

__________________ __________________ __________________

__________________ __________________ __________________

__________________ __________________ __________________

PP Plan Development Activity (activities may vary for each project)	**Responsible Person(s)**	**Due Date**
1. Develop interview list.	____________	______
2. Review/approve list for completeness.	____________	______
3. Provide site background information.	____________	______
4. Make contact, set up interviews.	____________	______
5. Develop interview questions.	____________	______
6. Approve interview questions.	____________	______
7. Conduct interviews.	____________	______
8. Follow up on commitments made in interviews.	____________	______
9. Prepare PP Plan.	____________	______
10. Review and approve PP Plan.	____________	______
11. Develop list of information repositories.	____________	______
12. Make contact to confirm repository locations.	____________	______
13. Send initial material to repository.	____________	______
14. Compile names for mailing list.	____________	______

Exhibit 6-8
Public Participation Plan Outline

A. Introduction

- Purpose of the Public Participation Plan;
- Agencies with oversight responsibilities at the site / facility;
- Description of how information was obtained—note that a list of persons interviewed during the Plan preparation is included in Appendix A;
- Summary descriptions of community concerns and the public participation program; and,
- How the Plan is organized.

B. Site/Facility History/Background

- Site / facility description;
- Area and site maps;
- History of site / facility (basic historical, geographical, and technical detail necessary to understand the site was listed on the State remediation list), including site location and proximity to community and geographic landmarks (e.g., homes, schools, playgrounds, businesses, lakes, streams);
- Agency involvement;
- History of community involvement, how the community has reacted to the site / facility in the past;
- Community concerns and issues; and
- Demographics of community in which the site is located (e.g., socioeconomic level, ethnic composition, specific language considerations, etc.). This information may be found in local libraries, on the internet, or in various public and private offices.

C. Community Concerns:

Reviews concerns outlined in the original plan and describes changes that have taken place since the time and inital plan was written. This discussion is based on information obtained during community interviews and through public comments.

D. Objectives of the Public Participation Plan:

Objectives specific to public participation for this site / facility and any special circumstances the Plan will address;

E. Public Involvement Activities:

Characterize the strategy for the public participation program at the site. Topics to be covered include:

- Description of methods of communication or activities to be conducted;
- Timing of these activities in relation to technical milestones, including a planning matrix at the end of this section;
- Responsibility for implementation of these activities (DTSC, Contractor, RFP, etc.);

- Resources to be used in the public participation program (e.g., local organizations, meeting places); and,
- Areas of special sensitivity that must be considered when conducting public participation and remedial activities.

F. Schedule of Public Participation Activities

This will be a one-page schedule that relates timing of public participation activities to technical milestones for the site/facility. If more than one entity has responsibility for the implementation of the Public Participation Plan, list each public participation activity and who has the responsibility for its implementation (i.e., DTSC, RP, EPA, Regional Water Quality Control Board, and county health department).

G. Appendix A - Key-Contacts Mailing List

This list will include names, titles, addresses and telephone numbers of all officials and group representatives contacted during the community interviews (indicated by asterisks) and others who should receive regular information about site development. Because the public participation plan is a public document, the telephone numbers and addresses of non-officials and non-affiliated individuals contacted for interviews will not be included as part of the Plan that is made available to the public. The list of contacts identified in the appendix should include the following:

- DTSC's Mandatory Mailing List.
- Mail delivery personnel (the local post office).
- Owners of the affected property .
- Federal, State and local elected officials (including city, county or township).
- Local and regional environmental and citizens' groups.
- DTSC officials (include all programs involved in the remedial process, e.g., Technical Services, Public Participation, Site Mitigation Branch).
- Interested residents.
- Local, State and federal health and environmental agencies.
- City and county clerks; city, county, and regional fire, health, water, air, environmental health, planning and transportation officials.
- Media contacts (newspaper, radio, and television). (See Chapter 6 E for complete list).
- Adjacent property owner.

H. Appendix B - Meeting Location and Information Repositories

This appendix will identify suitable locations for holding public meetings and making public information easily accessible to community members. Repository hours and contact names for both repositories and meeting places should also be included.

I. Appendix C – Glossary of Terms

A glossary will be used if the site background is particularly complex or if many technical terms or jargon are used in the public participation plan. Terms defined in the glossary will be indicated in the text of the public participation plan by italics, bold-faced type of underlining.

Exhibit 6-9

Public Participation Plan Reviewer's Checklist

Date:________________ ___Draft Plan ___Final Plan ___Revised Plan

Project: ____

Reviewer(s):____

<u>Review Criteria</u>

___ Determine need for or revision of PP Plan.

___ Review project background file.

___ Determine the number of interviews to conduct and with whom.

___ Conduct the interviews.

___ Draft the PP Plan or revision of PP Plan.

___ <u>Introduction</u>: Explains the purpose of the document.

___ <u>Site/Facility History/Background</u>: Reviews activities that have taken place since the initial plan was prepared.

___ <u>Community Concerns</u>: Reviews concerns outlined in the original plan and describes changes that have taken place since the time and inital plan was written. This discussion is based on information obtained during community interviews and through public comments.

___ <u>Objectives of the PP Plan</u>: Explains the major objectives of the plan relating to specific concerns outlined in the previous section of the document.

___ <u>Public Involvement Activities</u>: Describes the specific activities to be conducted to meet the objectives of the plan.

___ <u>Schedule of Public Participation Activities</u>: Relates timing of public participation activities to technical milestones for the site/facility.

___ <u>Appendices</u>: Updates information on key contacts, media, public meeting and information repository locations.

___ Coordinate internal review of PP Plan.

___ Prepare final plan based on comments received during internal review.

___ Distribute plan to information repositories.

	Page	Yes	No
1. Is the organization of the plan clearly presented in a table of contents and introductory paragraph?	___	___	___
2. Is the purpose of the plan stated?	___	___	___
3. Does the plan state which agencies have responsibility or oversight for public participation activities?	___	___	___
4. Does the plan describe how information was obtained?	___	___	___

5. Is there a list of people who were interviewed to obtain the information in the plan? ___ ___ ___
6. Are public participation activities listed in a matrix format, indicating which activity corresponds with each technical milestone? ___ ___ ___
7. Does the plan have a history or background section? ___ ___ ___
8. Does the community background section include a site/facility description and location map? ___ ___ ___
9. Does the plan describe the history of community interest and involvement in this project? ___ ___ ___
10. Does the plan identify potential issues and community concerns? ___ ___ ___
11. Are the objectives of the public participation program described in the plan? ___ ___ ___
12. Are these objectives based on the issues and community concerns identified in the plan? ___ ___ ___
13. Does the plan describe for each objective the public participation technique to be used and the purpose of each technique? ___ ___ ___
14. Is there a list of recommended locations near the site for information repositories? ___ ___ ___
15. If a site mitigation project, does the plan address all the requirements of the California Health & Safety Code, Sections 25356.1(d) and 25358.7? ___ ___ ___
    a. Circulate the draft RAP/draft RAW for 30 days for public review and comment. ___ ___ ___
    b. Develop a mailing list that, at a minimum, includes contiguous property owners and local and state agencies, and requires they be notified by direct mail of actions proposed in the draft RAP/draft RAW. ___ ___ ___
    c. Publish a notice of draft RAP/draft RAW availability for public review in a newspaper of general circulation in the affected area. ___ ___ ___
    d. Post notices in locations of porposed removal or remedial actions. ___ ___ ___
    e. Hold one or more public meetings on the draft RAP/draft RAW. ___ ___ ___
    f. Based on public comment, review draft RAP/draft RAW, if appropriate, and respond to comments. ___ ___ ___
16. Has a mailing list of key contact people been compiled for the site (in the Appendix)? ___ ___ ___
17. Are any follow-up actions required? ___ ___ ___
18. What is your overall assessment of this plan (identify problems, strong points, unresolved issues)? ___ ___ ___

Exhibit 6-10

Sample Signature Page for Final Public Participation Plan

Public Participation Plan - Community Relations Plan

Site Name:

Signed: ________________________________
Public Participation Specialist
California Environmental Protection Agency
Department of Toxic Substances Control

Date: __________________________________

Department of Toxic Substances Control

Public Participation Manual

CHAPTER 6 SECTION C
Fact Sheets

Chapter 6, Section C
Fact Sheets

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Fact Sheets

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Section C ♦ Fact Sheets

Overview

Fact sheets summarize the current status of a site cleanup, permit application/closure plan, or corrective action, and announce pending fieldwork, public meetings, or proposed decisions. **Additionally they encourage interested individuals to seek more complete and detailed information through specialized resources and forums, including community information repositories, open houses, public meetings, etc.** Fact sheets present technical and/or procedural information in a format that uses clear and understandable language. They vary in complexity and length, **but strive to be four pages or less. Fact sheets often employ graphs, illustrations and other visual aids to convey information.**

Fact sheets are useful for informing all interested parties about the basis for the agency's proposed decision regarding a site/facility or corrective action activities. They ensure that information is distributed in a consistent fashion so that citizens may understand the issues associated with a project.

Fact sheets with the DTSC logo must be placed on DTSC's web site.

Responsibilities

Fact Sheets Task Responsibilities

Public Participation Specialist	PPS, PM, or clerical support	Project Manager
♦ Identify need / objective / scope. ♦ Edit/revise / finalize. ♦ Approve final.	♦ Graphic design & layout. ♦ Printing & mailing.	♦ Prepare first draft of text. ♦ Provide additional information, as requested.

Timing

Fact sheets should be developed at those points during a project when DTSC has significant findings or other information to convey to the community. Factors that influence the need for a fact sheet for **both site mitigation and permitting** include:

- The nature of the information that is being imparted;
- The commencement of field activities that might create interest and/or concern in the community because of equipment or personal protective gear that will be used;
- Whether the information has caused this particular community (or any other community) to express interest or concern in the past; and
- Whether the affected audience would perceive a fact sheet as the appropriate medium by which the information should be imparted.

Site Mitigation

Fact sheets should be developed at points in the remedial process when DTSC has significant findings or other information to convey to the community. Fact sheets may be needed during:

- Site Discovery;
- Preliminary Endangerment Assessment (PEA);
- An emergency incident; and, during the Remedial Investigation/Feasibility Study, as technical milestones are reached;
- Announcing public comment periods;
- When there are Interim Remedial Measures (IRM) / or Removal Actions to inform the community of scheduled technical activities;
- Prior to the start of Remedial Investigation (RI) field activities;
- Upon completion of RI activities, or when significant sample results are available;
- Upon completion of the draft RAP;
- Upon selection of a cleanup alternative, particularly if the proposed alternative differs greatly from the alternative presented in the draft RAP; and,
- Final remediation or certification of a site;
- Prior to the start of cleanup activities.

HWM

Fact sheets should be developed at points in the project when DTSC has significant information to present to the community:

- To announce a public comment period;
- During review of the permit application or closure plan;
- Once a draft permit or closure plan is released for comment;

- Prior to any public meetings or hearings that are part of the permitting, closure or CEQA processes;
- Once a final permit or closure plan is issued, incorporating public comments;
- During facility construction, modification or closure; and,
- During the corrective action process as specified in the Public Participation Plan, or at a minimum, at the completion of the RCRA Facility Investigation and when proposing remedy selection.

Topics

There are several general categories of information that are included in fact sheets. While a fact sheet may be used to address a specific topic during a particular phase of an investigation or a project, the following basic information should also be included in the fact sheet. Refer to Exhibit 6-11, "Elements to consider for a Standard Fact Sheet".

Site Mitigation

Site Mitigation fact sheets should include, as appropriate:

- Site background/project history;
- Structure/duties of regulatory agencies;
- Relevant hazardous waste laws/regulations;
- Site location and surrounding environs (including sensitive receptors, generally within one mile radius);
- Site cleanup process;
- Sampling results;
- Ongoing/proposed technical activities at the site;
- Community involvement opportunities, announcements of public meetings, information repositories, and DTSC or other agency contact persons; and,
- Glossary defining acronyms or technical terms; graphs indicating project calendar and milestones.
- Telecommunications Device for the Deaf (TDD) announcement;
- Americans with Disabilities Act (ADA) information;
- E-mail address;
- A reference to information on DTSC's web site.

HWM

Hazardous Waste Management Permitting fact sheets should include, as appropriate:

- Proposed facility location and environs (including sensitive receptors, generally within one mile radius);
- Permit application summary and process;

- Proposed closure plan summary and process;
- Structure/duties of regulatory agencies;
- Relevant hazardous waste laws/regulations;
- Facility health and safety measures;
- Hazardous material spill response measures;
- Proposed measures to control potential contamination of environs;
- Opportunities for community involvement, announcements of public meetings, information repositories, and DTSC or other agency contact persons; and,
- Glossary defining acronyms and technical terms; and graphs indicating project calendar and milestones (including sensitive receptors, generally within one mile radius).

Exhibit 6 - 11

Elements to Consider for a Standard Fact Sheet

TOPICS	DEFINITION OF TOPICS
Introduction	State purpose of the fact sheet, summarizing contents.
Site/Facility History	Identify location (may use maps), site history, enforcement history, RP/proponent, etc. Specify that complete information is available in the repository.
Agencies' Responsibilities	Identify lead agency and all involved agencies' roles and responsibilities.
Laws & Regulations	General overview of primary hazardous waste laws/regulations applicable to the project, e.g., CEQA.
Process	Discussion of agency steps involved in IRP/remediation/permit determination/closure plan.
Sampling Results	Applies to relevant data pertaining to site activities/facility permitting/closure process.
Upcoming/Ongoing Activities	On-site activities expected in near future which would provide data for remedial/ permit/closure plan/corrective action activities.
Schedule	A discussion of when milestones are expected to be revealed.
Community Involvement	Identify public meetings, hearings, workshops, community interviews, agency
Opportunities	availability, public comment period, and where to send comments.
Glossary	All terms used in the fact sheet, which would be unfamiliar to the reading audience.
Coupon	Allows reader to be placed on mailing list or to change address. Include disclosure statement of Public Records Act requirement.
Contact Person(s)	List DTSC primary contact person(s) (address & phone #). Should be Program Manager and Public Participation Specialist, and other agreed upon contacts.
Repository Location(s)	List the address, phone # and hours of operation for repositories. May include the name of a contact person at the repository.
Survey	Allows reader to provide comments on agency performance, remedial activities, etc.
TDD	Fact sheets must include DTSC's TDD telephone number.
ADA	Compliance with Americans with Disabilities Act for meeting facilities.

Website and e-mail contacts

Writing the Fact Sheet

Initial considerations when developing a fact sheet are:

Purpose

- Determine the reason for preparing the fact sheet at a given time and the primary message to be communicated.
- The introductory paragraphs of the fact sheet should provide a short explanation of **who** is releasing the fact sheet, **why** it is being released at this time, and **what** will be found in the remainder of the fact sheet.

Audience

- Translation of fact sheet for a non-English-speaking community.
- General education level of the community.
- Community's history of involvement at the site or facility (if pre-existing).
- Media coverage of a project.
- Familiarity with hazardous waste issues.
- Community attitude(s) towards DTSC, other agencies, or the responsible parties.
- Diversity of interested individuals and groups, both local and statewide.
- Information that the community specifically requested during the development of the Public Participation Plan.

Fact Sheet Requirements

- All fact sheets should convey our mission: Protection of Public Health and the Environment.
- Cal/EPA requires all of its departments and boards to use recycled paper.
- Use the current DTSC template for fact sheets (one can be obtained from a Public Participation Specialist);
- Do not forget to use the proper project contacts and return address on fact sheets so readers will know how to reach us if they have any questions. Project contacts are usually the Project Manager, and the Public Participation Specialist. Use phone numbers, and specific street addresses.
- Use the DTSC glossary, which is on the DTSC web site and is attached to this manual, to aid readers in understanding complex words, phrases or government procedures. Staff can either include definitions in the text of the fact sheet, or in a stand-alone fact sheet glossary.
- Include the State, DTSC and Cal/EPA logos (They do not need to be placed in the same place on the fact sheet.)
- Include page numbers on every page.
- All fact sheets should include the month issued and where applicable, fact sheet numbers.

- List the following information to comply with the Americans with Disabilities Act:
  - Public Meeting Announcements: MEETING ACCESSIBILITY: For information on accessibility and to request reasonable accommodation, please call (Public Participation Specialist and phone number) at least one week in advance of the meeting.
  - Information Contacts section: NOTICE TO THE HEARING IMPAIRED: You can obtain additional information by using the California State Relay Service at 1-888-877-5378 (TDD). Ask them to contact the (Public Participation Specialist or Project Manager name and phone number) regarding the (project or site name).
- Include repository information.
- Include e-mail addresses.
- Include DTSC's web site.

Writing Tips

Start organizing the fact sheet information in an outline format. (See Exhibit 6-14, "Fact Sheet Outline".) Key points to remember in outlining the fact sheet include:

- A journalistic writing style is effective in fact sheets:
  - Present the facts in a concise manner;
  - Avoid complex sentences that tie together many ideas;
  - Consider the "five Ws" of journalism: who, what, when, where, why and how;
  - Use an active voice:

    <u>Example:</u> "DTSC will conduct the RI." (active voice)

    <u>not</u>

    "The Remedial Investigation will be conducted by DTSC." (passive voice)

    The active voice conveys to the public that DTSC is taking action to solve contamination problems in their community.
- Use language appropriate to the community's level of understanding of the issues being discussed and the type of information requested by the community.
- Avoid acronyms, jargon, and technical terms whenever possible. If the use of these words cannot be avoided, include their definitions in a Glossary. Spell out an acronym when first used (i.e., Remedial Action Plan [RAP]) and then define it in the Glossary. Look at each "technical" word and ask whether the average community member will know what it means (e.g., use "water table" instead of "aquifer").
- Translate where appropriate.

Design Elements

A visually appealing fact sheet is just as important as a well-written fact sheet. The first look at a fact sheet may determine whether a recipient reads it or not. Issues to consider when designing the fact sheet include:

Visual Presentations

- ♦ Headlines, page layout and graphics should be designed to catch the reader's eye.
- ♦ When using photos, use only action shots (a person collecting a soil sample or operating some earth-moving equipment, etc.)
- ♦ On occasion, you may want to vary typeface (fonts), to break up the monotony of text-heavy fact sheets. However, try to use fonts from the same family, if possible; serif (fonts with tails, or fancier script); or a serif (without tails, or more plain or blocked script). Check with your Public Participation Specialist when selecting fonts.
- ♦ There should be enough "white space" on the page so that it appears to the reader to be both interesting and readable.
- ♦ A two or three column format is preferred for inside pages.

Organization of Information

- ♦ Place the most important information in the beginning of the fact sheet. Use descriptive headlines to convey the key points of each section (e.g., "DTSC Finds Contamination in Soil", "Four Alternatives for Cleaning up the Site").
- ♦ Highlight important announcements by boxing text and placing in a prominent location on the first page.
- ♦ Draw the reader into the fact sheet by printing on the mailing label section (last page) a brief summary of the fact sheet topic (e.g., "Inside: DTSC Investigates Contamination at the [site name] Hazardous Waste Site").

Mailing List or Coupons

- ♦ "Tear-off" coupons provide the reader with an opportunity to be included on the site mailing list, or indicate their interest in some activity that DTSC is sponsoring;
- ♦ Coupons are usually placed on the reverse side of the recipient's mailing label so that when cut, none of the fact sheet information is destroyed; and
- ♦ Be sure site name appears on the coupon.

Design Considerations

- ♦ Graphics should be used when they easily depict written information in the fact sheet (e.g., sampling results, or air monitoring data), or can depict locations using area maps (e.g., maps, charts, matrices, well designs, plant configurations, site layout, contaminant plumes, removal areas).

- Use spot color when possible. While much more cost-effective than four-color fact sheets, use of color can also enliven a fact sheet and provide variety. Also, various tints of the same color can be used, creating a more visually attractive format.
- Utilize the graphics library, now on the U: drive of DTSC's wide area network (WAN). This library will contain previously used graphics (e.g., boxes, maps, charts and illustrations, etc.) on a wide range of subject matter.

Material

- Paper should be 60 or 70 pound weight (regular typing paper is 20 pound weight) to look professional and prevents text from "bleeding through" to the back side of the page;
- Use light-colored paper (i.e., white, cream, grey); and
- Use dark ink (soy-based, if possible) (i.e., black, navy blue, brown).

Size and Selection of Type (fonts)

- Typefaces (or "fonts") are the styles of letters used to **print words** and should be selected to enhance document draw and attractiveness. Typeface may vary from Gothic, to computer-simulated, to standard typewriter style;
- Choose a typeface that is easy to read and does not strain the reader's eye;
- The height of typeface letters is measured in "points", and it is suggested that fact sheets use a ten or twelve point type (most newspapers use a six or eight point type); and,
- Headline typeface should be two to four points larger than the text.

Production and Distribution Schedule

Significant last-minute fact sheet revisions will increase costs and delay the schedule. In general, allow four to six weeks to produce and distribute a fact sheet. (See Exhibit 6-12, "Fact Sheet Production Timeline".) To keep on schedule, remember:

- Have all appropriate parties review the fact sheet before it is **printed.**
- Expedite the review process by notifying appropriate individuals that the fact sheet will need to be reviewed by a certain time.
- If the fact sheet is being printed, it may require a minimum of seven working days, even on a rush schedule.
- Fact sheets should be mailed at least three to five working days prior to the target receipt date.
- Make sure you allow time for posting on DTSC web site (See your Public Participation Specialist for details.)
- Use the "Fact Sheet Production Checklist", Exhibit 6-13.

Exhibit 6-12

Fact Sheet Production Timeline

Activity	Production Time (in work days) 30	25	20	15	10	5	Mail Date
Determine contents of fact sheet	X						0
Prepare first draft of text	X						0
Collect/develop photos, maps, other graphics		X					0
Notify layout & design artist and printer of upcoming work			X				0
Circulate text and graphics for review			X				0
Revise text to reflect comments			X				0
Make necessary changes to graphics			X				0
Circulate text and graphics for final concurrence				X			0
Layout text and graphics in DTSC-approved Fact Sheet template				X			0
Make any final changes to text and/or graphics					X		0
Obtain final approval of the Fact Sheet					X		0
Give final copy to printer						X	0
Apply mailing labels to printed Fact Sheets						X	0
Mail fact sheets via First Class Mail**						X	0

* Keep in mind that more time may be necessary depending upon the number of individuals involved in the development and review process.

** Allow three days for fact sheets to reach people via First Class mail.

Exhibit 6-13

Fact Sheet Production Checklist

Project: ____________________

Fact Sheet Name/Number: ____________________

Targeted Mailing Date: ____________________

Activity	Responsible Person(s)	Due Date
___ Determine purpose and focus of fact sheet.	________	____
___ Develop outline.	________	____
___ Organize contents in a logical manner.	________	____
___ Determine appropriate graphics.	________	____
___ Update mailing list.	________	____
___ Draft text.	________	____
___ Identify typesetter and printer.	________	____
___ Work with Public Participation Specialist, contractor or graphic artist to develop graphics.	________	____
___ Review and approve draft text and graphics.	________	____
___ Work with typesetter to design fact sheet.	________	____
___ Develop rough layout of headlines, page layouts, and positions of graphics.	________	____
___ Determine column format.	________	____
___ Determine information to be highlighted through shading, lines, boxes or other methods.	________	____
___ Choose font(s) and point sizes of type.	________	____
___ Place mailing coupon on reverse side of mailing label.	________	____
___ Select weight and color of paper, and color of ink.	________	____
___ Revise text to reflect comments.	________	____
___ Work with graphic artist to revise graphics.	________	____
___ Circulate text and graphics for final concurrence.	________	____
___ Approve final text, graphics, and layout.	________	____
___ Give text and graphics to typesetter.	________	____
___ Proofread typeset, laid out copy.	________	____
___ Work with typesetter to make corrections.	________	____
___ Label fact sheets.	________	____
___ Mail fact sheets.		

Exhibit 6–14
Fact Sheet Outline

I. Introduction

A. Outline of fact sheet

B. General description of actions (draft permit & negative declaration.)

C. Brief description of actions, include modifications.

D. Corrective action

E. List sections of fact sheet

II. Background

A. Facility or site location (include proximity to people, sensitive receptors, etc.)

B. Facility or site history

C. Contamination

III. Facility or Site Description

A. Current activities proposed

1. Types of units and capacities, if applicable
2. Description of wastes (chemical & familiar)

B. Proposed actions

IV. Enforcement History, if applicable

A. Introduction, to include statewide enforcement

B. Description of incidents, leading to contamination or what happened

C. Summary of other enforcement actions

V. Explanation of Permit Conditions, if applicable

A. Statement of completion, with dates (Part B, Notice of Declarations, etc.)

B. Legal basis for permit

C. Categories of draft permit (list)

1. Standard conditions
2. General facility conditions
3. Other conditions

VI. Public Participation

A. Public comment period length and date, if applicable

B. Procedures for requesting a hearing meeting and/or reasonable accommodations (American Disabilities Act)

C. Location and hours of repositories

D. Where to send comments, if applicable (include e-mail address)

E. Notice of final decision, if applicable

F. Other opportunity for public involvement

VII. Statement of Basis

DTSC's shall prepare a "statement of basis" for every draft permit for which the Public Participation Specialist has determined that a fact sheet is not necessary due to the very low community interest at a facility. The statement of basis shall briefly describe the conditions of the draft permit and the reasons for them, or in the case of notices of intent to deny or terminate, reasons for supporting the tentative decision. The "statement of basis" shall be sent to the applicant and, on request, to any other person.

VIII. Information Letters

Information letters are used to update the residents and other interested individuals on the project mailing list. These letters are not as formal as a fact sheet and usually have a short production turn-around timeline.

Writing Tips:

- Use letter format;
- Have focused topics; and
- Include contact person's name, e-mail address, and phone number.

Refer to the Appendix for a sample of an information letter.