



EPA Environmental Justice Worksheet

INTRODUCTION

The purpose of this outline and the accompanying (optional) worksheet is to facilitate permit staff's collection and consideration of the potential EJ concerns associated with a given permit application. The outline identifies key elements that should be part of the examination, and the worksheet is meant to be an optional tool that allows permit staff to document the information collected. For most geographies, the information requested is available from EPA and other readily accessible databases.

To determine whether to complete this worksheet, the first step is to screen the community potentially impacted by the action under consideration for EJ concerns using EPA's official screening tool, EJSCREEN. Please consult the EJSCREEN Common User Guidelines for EPA's policy on use. For each census block group, EJSCREEN provides information on twelve different EJ Indices. Each EJ Index combines one environmental measure (e.g., $PM_{2.5}$) with demographic data (i.e., race and income) to provide a measure of the location's relative rank (expressed as a percentile) compared to other census block groups in the state, EPA Region, or nation. For purposes of identifying the relevant study area, please refer to the Common User Guidelines and other appropriate references. Note that this screening step is the same step that regions generally undertake in prioritizing permits for enhanced outreach.

Note: Neither EJSCREEN nor this worksheet is sufficient to support a conclusion as to whether or not disproportionately high and adverse impacts in fact exist. Rather, they are screening assessment tools used to allow EPA to examine general information in a nationally consistent manner in determining the potential for environmental justice concerns to arise. EJSCREEN results and worksheet information may or may not be pertinent to developing permit terms and conditions, depending on the particular permitting action being taken.

DESK REVIEW/STANDARD EJ ANALYSIS

Outline of Standard Elements

1. Demographic Information (Data source: EJSCREEN)
 - a. Overview
 - i. Total Population
 - ii. Population Density
 - iii. Average Family Income
 - b. Linguistic Isolation (if any)
Percent speaking non-English at Home
 - c. Age Distribution
 - i. Percent < 5 years of age
 - ii. Percent < 15 years of age
 - iii. Percent > 65 years of age
 - d. Additional relevant information
2. Community Health (Data source: NEPAssist)
 - a. % Uninsured rate
 - b. Community Health Concerns (professional judgment or from community input)
 - c. Permit-Specific and/or media-specific health concerns (TBD)
3. Land use Context and/or Environmental Burden
 - a. Overview (Data source: EJSCREEN)
 - i. Permitted Facilities
 - b. Sensitive Land Uses (Data source: NEPAssist)
 - i. Health Care Facilities (e.g., hospitals, health clinics, hospices)
 - ii. Schools (include day care and head start centers, etc.)
 - iii. Community Gathering places (include senior centers, houses of worship, etc.)
4. Applicant Information
 - a. Overview (Data source: permit reviewer)
 - i. Overall action impact
 - ii. Existing Monitoring
 - iii. Other facilities Applicant operates
 - b. Compliance History (Data source: NEPAssist)
 - i. If renewal, number and type of violations within 2 years
 - ii. If new, number and type of violations at similar facilities Applicant operates
 - c. Best Practice (Data source: media webpage)
 - i. Relevant Pollution Practices and/or Technology at Similar Facilities Applicant Operates
 - ii. Relevant Pollution Practices and/or Technology at Similar Facilities in the Industry
 - d. Additional compliance information
5. Conclusion

Worksheet Template (use if helpful)

1. **Demographic Information:** Please identify the demographic makeup of the impacted community. Reference populations can be assessed at the state, regional or national levels according to regional practice. (Data source: EJSCREEN [Alternative Demographic Index])

Overview

Total population

Location of interest NA Reference _____

Population density

Location of interest 200-1,000 Reference _____

Average Family Income

Location of interest 130-16,000 Reference _____

Linguistic Isolation

Percent Speaking Non-English at Home

Location of interest 10% - 100% Reference _____

Age Distribution

Percent <5 yoa

Location of interest NA Reference _____

Percent < 15 yoa

Location of interest 20-30% Reference _____

Percent >65 yoa

Location of interest NA Reference _____

Additional Relevant Demographic Information:

2. **Community Health:** Please identify health burdens associated with the potentially impacted community. The data requested can be found from the source indicated.

Health

% Uninsured (Data source: Census Bureau [Small Area Health Insurance Estimate¹])

Location of interest NA Reference _____

Community Health Concerns Infant Mortality + low birth weight

Location of interest _____ Reference _____

Permit-Specific and/or Media Specific Health Concerns

Location of interest NA Reference _____

Additional Relevant Community Health Information:

¹http://www.census.gov/did/www/sahie/data/interactive/#view=data&utilBtn=&yLB=0&stLB=0&aLB=0&sLB=0&iLB=0&rLB=0&countyCBSelected=false&insuredRBG=pu_&multiYearSelected=false&multiYearAlertFlag=false

3. **Land Use Context/Environmental Burden:** Please identify major land use concerns in the area surrounding the facility and/or the impacted community. (Data source: EPA's EJView or NEPAassist)

Overview

Permitted Facilities

Number/Density 14

Type All Programs

Sensitive Land Uses

Health Care Facilities (e.g., hospitals, health clinics, hospices)

Estimated Range of number 0 Type _____

Schools (include day care, head start, etc.)

Estimated Range of number 1 Type _____

Community Gathering Places (e.g., houses of worship, senior centers, etc.)

Estimated Range of number 0 Type _____

Additional Relevant Land Use and/or Environmental Burden Information:

4. **Applicant information:** Please identify the Applicant's compliance history and past practices. (Data source: ECHO, ICIS, and media-specific program webpages)

Overview

SEE ATTACHMENT (ECHO Report)

Type of Pollutant Generated - Is the net output an increase or decrease? (Please circle one)

Existing monitoring (if known)

Type _____ Location and/or placement _____

Other facilities operated by Application (if known)

Type _____ Location _____

Compliance History

If renewal, violation at current facility over past 2 years

Type _____ Number _____

If new, violations at similar facility operated by Applicant

Type _____ Number _____

Applicant Practice

Relevant Pollution Practices and/or Technology at Similar Facilities Applicant Operates

Type _____ Location _____

Relevant Pollution Practices and/or Technology at Similar Facilities in the Industry

Type _____ Location _____

Additional Relevant Compliance Information:

5. CONCLUSION

Summary of desk review/basic EJ analysis – discuss information beyond what was considered in screening step as needed and available to describe existing burdens, vulnerabilities, and expected effects on potentially impacted community

Describe one or more of the following conclusions, as appropriate –

No significant disproportionate or other adverse impacts

No significant disproportionate or other adverse impacts that can be addressed in permit

Identify any impact that can/should be addressed in the permit and/or by a voluntary agreement involving EPA

Determine whether ore analysis is needed and appropriate in light of available data, resources and time

Identify and support permit terms and conditions and/or other outcomes (as appropriate)

Inform/be informed by outreach efforts

Additional EJ analysis where needed, appropriate

ADDITIONAL ENVIRONMENTAL JUSTICE CONSIDERATIONS (OPTIONAL)

The following list identifies other information that may also be useful in determining the potential EJ concerns a community could face. Collecting this information is not required for purposes of this worksheet, but permit writers may find some of this information, if available, helpful in assessing a given locality for potential EJ concerns. Also included below are some potential data sources that may be useful.

Identifying Stakeholders

Name (Examples)	Type (Individual/ Organization)	Interest	Potential Role	Contact
Community-Based Organization				
Faith-Based Organization				
Elected Official				
Resident				

Socio-Demographic Issues

The U.S. Census Bureau provides housing and demographic data at <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>, crime rate data can be found at the municipality's web site):

Education Level (e.g., # and % of people without a H.S. diploma):

Housing Units:

and % of Households with No Heat:

and % of Households with No Plumbing:

and % Female Head of Household:

Crime Rate:

Community Location and Sensitivity of Local Land Use

(The following data may also be beneficial in considering the site's impact as well as the communities' cumulative burden.² You may attach GIS maps.):

Senior centers:

Cemetery:

Overall Facility Footprint (Not just center point):

Environmentally Sensitive Areas³:

Transportation Infrastructure (Roads/Rails/Bus Depots):

² You may find the following resources useful: NEPASSIST, <http://204.46.96.90/NEPAVE/entry.aspx>; EJView, <http://epamap14.epa.gov/ejmap/entry.html>, and the R2 Data gateway, <http://r2notes3.r02.epa.gov/Intranet/iOPM-ISB.ns/0/511362FD52A8836085257B19006EB9F5>.

³ Pursuant to CWA 311(b)(3) and 311(j)

Slurry Injection Sites:

Additional Information About Community Health

Diabetes Incidence:

Overweight Rate:

Smoking Rate:

Cancer (Type and Rate):

Drinking Water [Relevant to UIC-related reviews]

There is (is not) a violation(s) of relevant drinking water regulations in the **(Area Under Study's)** public drinking water system in the Safe Drinking Water Information System (SDWIS) as reported to EPA by the states. Additionally, EPA has found the following [] drinking water issues in private wells as reported by the **(Fill in Municipality)** Department of Health with jurisdiction over **(Area Under Study)**

Subsistence Fishing, Hunting & Foraging

(Fill State Agency with jurisdiction) has reported to EPA that subsistence **[fishing, hunting, and/or foraging]** is (are) practiced in the **(Area Under Study)**. This activity represents a unique exposure pathway that increases the vulnerability of this area to the proposed action.

Other Considerations

[INSERT ANY ADDITIONAL INFORMATION YOU THINK IS RELEVANT]

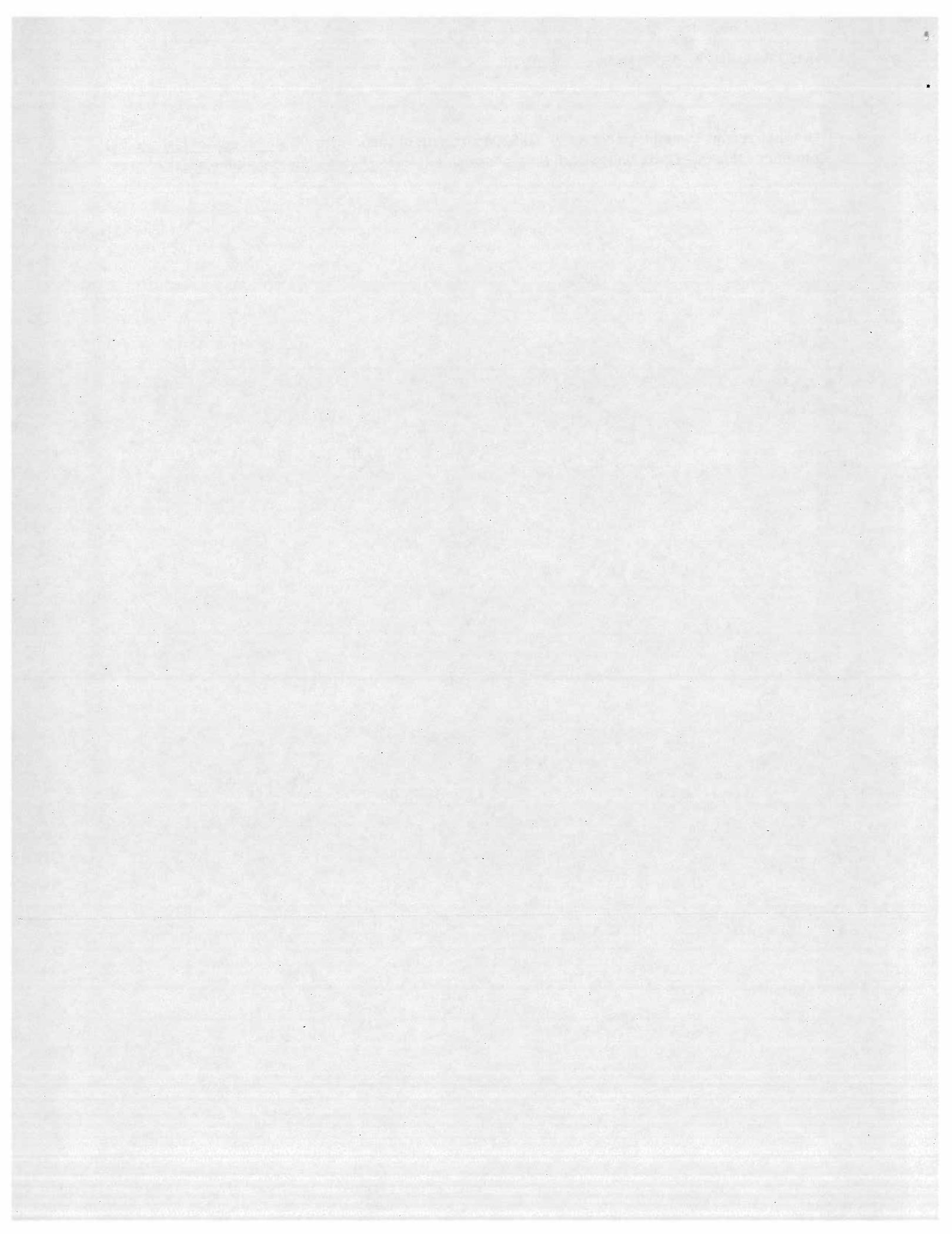
ADDENDUM: ENVIRONMENTAL JUSTICE CHECKLIST

- Proximity and exposure to environmental hazards
 - Populations in close proximity to the project?
 - Are Probable cultural, historic, or archeological sites listed or eligible for listing in the National Register of Historical Places within the proposed action area or adjacent areas?
 - Known users of any surface water resources in the permit area?
 - Air pollution monitors, pollution control facilities or private monitoring locations on or near the proposed action area?
 - Alternate water resources identified for this operation?
 - Structures located within the boundaries or in close proximity to the permit location?
 - If so, are those structures occupied?
 - What are the structures used for?
 - Other wells, springs, or surface water bodies located in the study area? How are they used? (Relevant only to UIC and water permitting actions)
 - Water supply intakes in the area of concern? (Relevant only to UIC and water permitting actions)
 - Are there environmental clean-up projects identified or in progress in this area?
- Susceptibility/vulnerability
 - Children <5y, pregnant women, or elderly persons residing in close proximity to the project site?
 - Hospitals, hospices (e.g., old age and AIDS), or community medical clinics near the project site?
 - Low income or minority populations in the project area?
 - Substances known to have adverse health effects on humans that are associated with the permit activities or that may be by-products of activities?
- Unique exposure pathways
 - Subsistence fishing
 - Hunting and consuming wild game that inhabits the project area
 - Harvesting of wild plants for subsistence
- Cumulative burdens
 - Multiple sources of potential exposure to harmful substances located in close proximity?
 - Multiple substances of toxicological concern associated with the operation that may pose a threat to human health?
- Diminished ability to participate in the decision making process
 - Populations present in the area of concern with limited English proficiency?
 - Populations present in the study area without internet access?
 - Populations present in the study area without easy access to public resources such as libraries, town halls, or other public facilities that may serve as repositories of public information?
 - Populations present in the study area without easy access to transportation?
 - Materials produced in a format that may be understood by all?
- Physical infrastructure
 - Concerns with physical infrastructure such as water supplies, roads, and bridges that may pose environmental or safety risks associated with the operation?
- Chronic community stress
 - Stresses associated with chronic unemployment, environmental hazards, access to services, or other continuing stresses that may impact the population?

SOURCES OF DATA

RIMCO PR0000477 - DELIBERATIVE - 09/10/14

Labor Issues (e.g., Unemployment Rate) - U.S. Department of Labor (<http://beta.bls.gov/maps/cew/us>)
Community Health - Community Health Needs Assessment (<http://www.chna.org/Home.aspx>)



Menu

You have been redirected from the former ECHO site to the modernized ECHO, now at echo.epa.gov. Please update your bookmarks, and see our ECHO Modernization Information page to learn about the new ECHO.



Detailed Facility Report

Facility Summary

RIMCO INCORPORATED
STATE ROAD 2 KM 3, SAN JUAN, PR 00936

Facility Information (FRS)

FRS ID: 110006623029
EPA Region: 02
Latitude: 18.423836
Longitude: -66.097943
Industry:
Indian Country: N

Regulatory Interests

Clean Air Act: No Information
Clean Water Act: Major, Permit Admin Continued (PR0000477)
Resource Conservation and Recovery Act: No Information
Safe Drinking Water Act: No Information

Also Reports

Air Emissions Inventory (EIS): No Information
Greenhouse Gas Emissions (eGGRT): No Information
Toxic Releases (TRI): No Information

Enforcement and Compliance Summary

Statute	Insp (5 Years)	Date of Last Inspection	Current Compliance Status	Qtrs in NC (of 12)	Qtrs in Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
CWA	5	08/20/2014	No Violation	5	4	--	--	--	--	--

Facility/System Characteristics

Facility/System Characteristics

Statute	Identifier	Universe	Status	Areas	Permit Expiration Date	Indian Country	Latitude	Longitude
--	110006623029	--	--	--	--	N	18.423836	-66.097943
CWA	PR0000477	Major: NPDES Individual Permit	Admin Continued	--	05/01/2011	N	18.423836	-66.097943

Facility Contact Information

System	Identifier	Facility Name	Facility Address
FRS	110006623029	RIMCO INCORPORATED	STATE ROAD 2 KM 3, SAN JUAN, PR 00936
ICP	PR0000477	RIMCO INC	STATE ROAD 2, KM 3, SAN JUAN, PR 00936

Facility SIC Codes

System	Identifier	SIC Code	SIC Desc
ICP	PR0000477	5082	--

Facility NAICS Codes

System	Identifier	NAICS Code	NAICS Desc
No data records returned			

Facility Tribe Information

Tribal Name	EPA Tribal ID	Distance to Tribe (miles)
No data records returned		

Enforcement and Compliance

Compliance Monitoring History (5 years)

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
CWA	PR0000477	ICP	Evaluation	EPA	09/20/2012	--
CWA	PR0000477	ICP	Evaluation	State	08/18/2011	--
CWA	PR0000477	ICP	Evaluation	EPA	09/17/2010	--
CWA	PR0000477	ICP	Evaluation	State	09/21/2012	--
CWA	PR0000477	ICP	Evaluation	EPA	08/20/2014	--

Entries in italics are not considered inspections in official counts.

Compliance Summary Data

Statute	Source ID	Current SNC/HPV	Description	Current As Of	Qtrs in NC (of 12)
CWA	PR0000477	--	--	06/30/2014	5

Three Year Compliance Status by Quarter

Statute	Program/Pollutant/Violation Type	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12	QTR 13*
CWA	(Source ID: PR0000477)	07/01-09/30 2011	10/01-12/31 2011	01/01-03/31 2012	04/01-06/30 2012	07/01-09/30 2012	10/01-12/31 2012	01/01-03/31 2013	04/01-06/30 2013	07/01-09/30 2013	10/01-12/31 2013	01/01-03/31 2014	04/01-06/30 2014	07/01-09/30 2014
Facility-Level Status		No Viol	No Viol	No Viol	No Viol	In Viol	SNC/Cat 1	SNC/Cat 1	SNC/Cat 1	SNC/Cat 1	No Viol	No Viol	No Viol	Und
SNC/RNC History		--	--	--	--	V (NonRNCV)	D(DMR NR)	D(DMR NR)	D(DMR NR)	D(DMR NR)	--	--	--	--

*Quarter 13 is draft/unofficial and has not been fully quality assured. Read more

Informal Enforcement Actions (5 Years)

Statute	Source ID	Type of Action	Lead Agency	Date
No data records returned				

Formal Enforcement Actions (5 Years)

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description
No data records returned						

ICIS Case History (5 years)

Primary Law/Section	Case No.	Case Type	Lead Agency	Case Name	Issued/Filed Date	Settlement Date	Federal Penalty	State/Local Penalty	SEP Cost	Comp Action Cost
No data records returned										

Environmental Conditions

Water Quality

Permit ID	Watershed (HUC 8)	Watershed Name (HUC 8)	Watershed (HUC 12)	Watershed Name (HUC 12)	Receiving Waters	Impaired Waters	Combined Sewer System?
PR000047721010005		EASTERN PUERTO RICO	--	--	C MERC LA TORRE	No	--

Air Quality

Non-Attainment Area?	Pollutant(s)
No	Ozone
No	Lead
No	Particulate Matter

Pollutants

TRI History of Reported Chemicals Released in Pounds per Year at Site

TRI Facility ID	Year	Total Air Emissions	Surface Water Discharges	Off-Site Transfers to POTWs	Underground Injections	Releases to Land	Total On-site Releases	Total Off-site Releases
No data records returned								

TRI Total Releases and Transfers in Pounds by Chemical and Year

Chemical Name
No data records returned

Demographic Profile

Demographic Profile of Surrounding Area (3 Miles)

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2010 US Census and American Community Survey data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA Locational Reference Table (LRT) when available.

Radius of Area:	3	Land Area:	83%	Households in Area:	73,565
Center latitude:	18.423836	Water Area:	17%	Housing Units in Area:	90,796
Center Longitude:	-66.097943	Population Density:	7,239/sq.mi.	Households on Public Assistance:	3,210
Total Persons:	169,522	Percent Minority:	99%	Persons Below Poverty Level:	100,831
Race Breakdown		Persons (%)		Age Breakdown	
White:	120,014 (70.8%)	Child 5 years and younger:	9,304 (5.49%)	Persons (%)	
African-American:	27,472 (16.21%)	Minors 17 years and younger:	34,502 (20.35%)		
Hispanic-Origin:	165,947 (97.89%)	Adults 18 years and older:	135,021 (79.65%)		
Asian/Pacific Islander:	785 (.46%)	Seniors 65 years and older:	31,116 (18.36%)		
American Indian:	1,357 (.8%)				
Other/Multiracial:	19,895 (11.74%)				
Education Level (Persons 25 & older)		Persons (%)		Income Breakdown	
Less than 9th Grade:	18,182 (15.1%)	Less than \$15,000:	41,992 (34.89%)	Households (%)	
9th through 12th Grade:	10,604 (8.81%)	\$15,000 - \$25,000:	10,327 (15.32%)		
High School Diploma:	23,744 (19.73%)	\$25,000 - \$50,000:	16,162 (23.98%)		
Some College/2-yr:	25,849 (21.47%)	\$50,000 - \$75,000:	7,915 (11.74%)		
B.S./B.A. or More:	41,992 (34.89%)	Greater than \$75,000:	9,180 (13.62%)		