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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND
1 CONGRESS STREET, BOSTON, MA 02114

Superfund Records Center
SITE: Centredale
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OTHER: 253314

April 6, 2005

Robert R. Vanderslice
Rhode Island Department of Public Health
Environmental Health Risk Assessment
Three Capitol Hill - Room 208
Providence, RI 02908

Dear Dr. Vanderslice,

Please find enclosed the report that has been prepared and submitted to EPA by Marion Cox of Resource Associates summarizing the phone interviews she conducted regarding the Centredale Manor Site. Thank you for taking the time to speak with Marion.

We want to take some time to review the report in greater detail, but it is already apparent to us that it provides valuable feedback that deserves our attention. We are currently considering the conclusions and recommendations that have been drawn from the interview process and look forward to discussing our next steps with you.

Should you have any questions or comments about the report, please feel free to contact Elissa Tonkin of our ADR program at 617-918-1726 or Angela Bonarrigo at 617-918-1034.

Sincerely,

Angela Bonarrigo
Community Involvement Coordinator

Anna Krasko
Project Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND
1 CONGRESS STREET, BOSTON, MA 02114

April 6, 2005

Louis R. Maccarone II
Rhode Island Department of Environmental Management
Office of Waste Management
235 Promenade Street - Suite 380
Providence, RI 02908

Dear Mr. Maccarone,

Please find enclosed the report that has been prepared and submitted to EPA by Marion Cox of Resource Associates summarizing the phone interviews she conducted regarding the Centredale Manor Site. Thank you for taking the time to speak with Marion.

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Community Involvement Coordinator

Anna Krasko
Project Manager

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NEW ENGLAND
1 CONGRESS STREET, BOSTON, MA 02114

April 6, 2005

Roland Mergener
North Providence Conservation Commission
24 Oak Grove Blvd.
North Providence, RI 02911

Dear Mr. Mergener,

Please find enclosed the report that has been prepared and submitted to EPA by Marion Cox of Resource Associates summarizing the phone interviews she conducted regarding the Centredale Manor Site. Thank you for taking the time to speak with Marion.

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Community Involvement Coordinator

Anna Krasko
Project Manager

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1 CONGRESS STREET, BOSTON, MA 02114

April 6, 2005

Jenny Pereira
WRWC
532 Kinsley Ave.
Providence, RI 02909

Dear Ms. Pereira,

Please find enclosed the report that has been prepared and submitted to EPA by Marion Cox of Resource Associates summarizing the phone interviews she conducted regarding the Centredale Manor Site. Thank you for taking the time to speak with Marion.

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Angela Bonarrigo
Community Involvement Coordinator

Anna Krasko
Project Manager

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NEW ENGLAND
1 CONGRESS STREET, BOSTON, MA 02114

April 6, 2005

Jane Sherman
Providence Plan
532 Kinsley Ave.
Providence, RI 02909

Dear Ms. Sherman,

Please find enclosed the report that has been prepared and submitted to EPA by Marion Cox of Resource Associates summarizing the phone interviews she conducted regarding the Centredale Manor Site. Thank you for taking the time to speak with Marion.

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Angela Bonarrigo
Community Involvement Coordinator

Anna Krasko
Project Manager

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NEW ENGLAND
1 CONGRESS STREET, BOSTON, MA 02114

April 6, 2005

Johanna Hunter
WRWC
532 Kinsley Ave.
Providence, RI 02909

Dear Ms. Hunter,

Please find enclosed the report that has been prepared and submitted to EPA by Marion Cox of Resource Associates summarizing the phone interviews she conducted regarding the Centredale Manor Site. Thank you for taking the time to speak with Marion.

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Community Involvement Coordinator

Anna Krasko
Project Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND
1 CONGRESS STREET, BOSTON, MA 02114

April 6, 2005

Eugenia Marks
Audubon Society of RI
12 Sanderson Rd.
Smithfield, RI 02917

Dear Ms. Marks,

Please find enclosed the report that has been prepared and submitted to EPA by Marion Cox of Resource Associates summarizing the phone interviews she conducted regarding the Centredale Manor Site. Thank you for taking the time to speak with Marion.

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Sincerely,

Angela Bonarrigo
Community Involvement Coordinator

Anna Krasko
Project Manager

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NEW ENGLAND
1 CONGRESS STREET, BOSTON, MA 02114

April 6, 2005

Michael Milito
RI Housing and Mortgage Finance Corporation
44 Washington Street
Providence, RI 02903-1721

Dear Mr. Milito,

Please find enclosed the report that has been prepared and submitted to EPA by Marion Cox of Resource Associates summarizing the phone interviews she conducted regarding the Centredale Manor Site. Thank you for taking the time to speak with Marion.

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Community Involvement Coordinator

Anna Krasko
Project Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND
1 CONGRESS STREET, BOSTON, MA 02114

April 6, 2005

Michale Merrill
NRCS
60 Quaker Lane - Suite 46
Warwick, RI 02886

Dear Mr. Merrill,

Please find enclosed the report that has been prepared and submitted to EPA by Marion Cox of Resource Associates summarizing the phone interviews she conducted regarding the Centredale Manor Site. Thank you for taking the time to speak with Marion.

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Angela Bonarrigo
Community Involvement Coordinator

Anna Krasko
Project Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND
1 CONGRESS STREET, BOSTON, MA 02114

April 6, 2005

A. Ralph Mollis, Mayor
Town of North Providence
2000 Smith Street
North Providence, RI 02911

Dear Mayor Mollis,

Please find enclosed the report that has been prepared and submitted to EPA by Marion Cox of Resource Associates summarizing the phone interviews she conducted regarding the Centredale Manor Site. Thank you for taking the time to speak with Marion.

We want to take some time to review the report in greater detail, but it is already apparent to us that it provides valuable feedback that deserves our attention. We are currently considering the conclusions and recommendations that have been drawn from the interview process and look forward to discussing our next steps with you.

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Sincerely,

Angela Bonarrigo
Community Involvement Coordinator

Anna Krasko
Project Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND
1 CONGRESS STREET, BOSTON, MA 02114

April 6, 2005

Bill Sweet
ATSDR
One Congress Street, Suite 1100
Boston MA 02114

Dear Mr. Sweet,

Please find enclosed the report that has been prepared and submitted to EPA by Marion Cox of Resource Associates summarizing the phone interviews she conducted regarding the Centredale Manor Site. Thank you for taking the time to speak with Marion.

We want to take some time to review the report in greater detail, but it is already apparent to us that it provides valuable feedback that deserves our attention. We are currently considering the conclusions and recommendations that have been drawn from the interview process and look forward to discussing our next steps with you.

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Angela Bonarrigo
Community Involvement Coordinator

Anna Krasko
Project Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND
1 CONGRESS STREET, BOSTON, MA 02114

April 6, 2005

Kenneth Finkelstein
NOAA
One Congress Street, Suite 1100
Boston, MA 02114

Dear Mr. Finkelstein,

Please find enclosed the report that has been prepared and submitted to EPA by Marion Cox of Resource Associates summarizing the phone interviews she conducted regarding the Centredale Manor Site. Thank you for taking the time to speak with Marion.

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Sincerely,

Angela Bonarrigo
Community Involvement Coordinator

Anna Krasko
Project Manager

FINAL
CENTREDALE MANOR
Phone Interviews Summary
March 23, 2005

This document presents a summary of information gathered during telephone interviews with key parties regarding a proposed "dialogue" on remedy selection for the Centredale Manor Superfund site. The information presented in this document is organized as follows:

- Background on the proposed dialogue
- Overview of the interview process
- Summary of information gathered during the phone interviews
- Recommendations for next steps

BACKGROUND

In the Fall of 2004, EPA's Centredale Manor Superfund project staff hired a neutral facilitator to talk with key parties who have been actively participating in activities associated with the Centredale Manor Superfund site [Centredale Manor site]. EPA wanted to know if these parties are interested in participating in a dialogue regarding possible remedies for this site.

EPA is considering a dialogue regarding remedy selection for the Centredale Manor site because the Agency feels there are a range of possible remedies that could be implemented at this site. As a result EPA's project team is interested in hearing directly from parties who have been actively involved with the Agency at this site to hear their views on matters related to the selection of a remedy at this site.

OVERVIEW OF THE INTERVIEW PROCESS

In January 2005, EPA and the neutral facilitator began working together to identify the issues and questions EPA wanted to learn more about in order to determine if the proposed dialogue might be relevant prior to the Agency finalizing the feasibility study [FS] for this site. EPA provided the facilitator with a list of key participating parties. The facilitator interviewed a total of 31 people between January 20 and February 28, 2005 including:

- All the known potentially responsible parties [PRPs] or their representatives
- Organized interest groups who have been involved at this site
- Local elected and appointed officials in jurisdictions associated with the Centredale site
- Local, state, and federal agency representatives with an interest in or responsibilities associated with this site.

Each interview lasted between 30-60 minutes. All individual interviews are confidential.

SUMMARY OF INFORMATION GATHERED

The facilitator posed three questions to those interviewed. This section presents a summary of the information gathered during the interviews. The recommendations presented in the final section of this report are the conclusions and recommendations of the facilitator alone.

Question #1 Is the proposed dialogue a good idea?

- The majority of people interviewed think the idea of a dialogue regarding possible remedies at the Centredale Manor site is a good one.

- Several respondents note that it will be very useful to gather diverse parties together to talk about the river because these parties may be able to identify a wider range of "resources" [funds and otherwise] that can be used to address some of the needs and interests of parties regarding both remediation and the future of this river.

- Many people believe the proposed dialogue represents an opportunity for key parties to work together in a collaborative effort, and has the possibility of generating new ideas and thinking about a remedy for this site.

- A notable exception to the generally positive reaction to the idea of a dialogue are questions raised by some of the PRPs. PRP respondents had a number of questions related to "timing" of the proposed dialogue including the following:

  - Is this type of dialogue premature due to the fact that EPA has not yet presented its "feasibility study" [FS] identifying the range of remedial alternatives under consideration by the Agency ?
  - Some PRPs question whether they can contribute effectively, at this point in time, because the currently-identified PRPs have not reached agreement among themselves regarding important liability and cost allocation issues.

Threshold questions raised by respondents:

Respondents raised a variety of questions about the specifics of how EPA envisions the proposed dialogue. Some of these questions appear to be central to the ability of some parties to participate effectively in the dialogue. A representative sample of these questions follows:

- How does this dialogue fit into the formal RI/FS process? How does this effort relate to the "record of decision" [ROD] decision process? Will these discussions be part of EPA's formal administrative record for this site?

- What specific outcome or product is EPA looking for from the dialogue? How will the results of this "dialogue" be used when EPA selects a remedy for this site?

- Why does EPA think the proposed dialogue is a better way to proceed than the more familiar process where the Agency first finalizes its "feasibility study" for the site and lays out the alternative remedies the Agency is considering?

- How does this dialogue fit together with Superfund "public involvement" requirements for public input into the ROD decision process? Can anyone who wants to participate in this dialogue, join?

- Can EPA provide the parties with a clear idea of the Agency's goals for cleanup at this site and how these goals relate to the site investigation findings and the risk assessment findings?

Key questions and comments raised by PRPs:

In addition to the points listed above, the PRPs offered a wide range of comments and questions associated with EPA's enforcement case and future settlement negotiations for this site. These matters fall outside the concept of the proposed dialogue; therefore, EPA has requested that these comments and questions not be summarized in this document.

Question #2 If a dialogue occurs, what are the issues and topics that should be discussed?

Respondents offered a wide range of ideas in response to this question. However, for some respondents, this question was difficult to answer. These people were not sure if they had enough technical knowledge or background to answer the question. Despite this initial hesitation, everyone did offer suggestions after further discussion with the facilitator. The ideas and topics listed below are not presented in order of priority; however, similar topics and questions have been grouped together under umbrella headings so that similar items appear together.

Technical issues and related policy questions:

- Many respondents state they need more information from EPA to be effective dialogue participants. Some of the specific information needs cited include:
    - What are the specific facts and conclusions that EPA has made about this site?
    - What are EPA's remediation and human health and safety goals for this site?
    - How do EPA's risk assessment findings relate to EPA's overall goals for this site?
    - How do the risk assessments fit into the overall context of the river environment based upon the history of industrial use throughout this area?
- What are the major contaminants EPA is proposing to remediate?
- What is the geographic extent of the contamination that EPA is proposing to remediate? Are contaminants continuing to migrate downstream? If so, how will contamination downstream be dealt with in this dialogue?
- What is EPA doing, at this point in time, to remediate this site?
- What are the costs and benefits of "dredging" the entire site?
- Is the Centredale Manor site the only contributor to the river contamination that EPA is proposing to remediate?
- What specifically are the alternatives EPA is considering to remediate this site?
- Can EPA present a "cost-benefit" analysis of the alternatives it is considering?
- Can EPA present real-life examples where particular alternatives have been used successfully at other sites? Some parties feel this type of information would be helpful to participants as they discuss the pros and cons of various remedial alternatives.

Broader "policy" questions and topics associated with discussion of a remedy:

- What are EPA's constraints in selecting a remedy for this site? Technical, policy, and funding constraints?

- Who will pay for this remediation? How much funding does EPA have to undertake a remedy? Several respondents feel the need to know the answer to this question before they can contribute meaningfully to a discussion of specific remedies.

- What is the Agency's approach to dealing with potential contamination downstream [ie, nearer Providence] ?

    - How much of the river does EPA think the Agency will eventually remediate? Some people feel the need to know this before they can contribute to a discussion of specific remedies.

- "Future use(s)" of the river: Many people have views on whether and how the subject of future uses should be discussed as part of a dialogue. A representative sample of the comments received on this topic include:

    - Would participants in such a dialogue be the appropriate group of individuals to discuss or agree on "future uses" for the river? How does EPA see broader public input fitting into a discussion of future uses of the river?

    - Some respondents believe that future use scenarios should be discussed prior to remedy selection so that EPA can focus its efforts on a cleanup compatible with how the adjacent communities [and the region] want to use the river and its resources in the future.

    - Other respondents believe any discussion of "future uses" will raise expectations about how this site should be cleaned up. For example, some feel contamination in and around the river could extend far beyond the areas currently being investigated by EPA; some note that many industries have historically contributed to area-wide contamination and most of these operations have long since disappeared; and some feel it is unfair to expect currently identified PRPs to shoulder the burden [and costs] of remediating this site to meet the standards associated with [future] uses that may be inconsistent with the way this area has been used during the recent past [ie, industrial uses - not recreational uses].

    - What is EPA thinking about "beneficial uses" or "restoration potentials" for the river [e.g., migratory fish passage, recreational access to the river, etc.]? How will EPA's remedial decision deal with fish and related water resources?

<u>Safety and security issues associated with remediation:</u>

- How does EPA plan to address "impacts" from remedial activities on the three communities of: North Providence, Johnston, and Providence?

- How does EPA plan to address "long-term security" issues at this site as part of its remedy [ie, making sure that further chemical contamination is interrupted before it enters pathways of exposure that could affect animals or humans].

- How does EPA propose to ensure the "safety" of surrounding communities and the river resource when moving contaminated soils in and around this site?

Question #3 What are your ideas and suggestions related to the structure and process used for the dialogue?

In addition to addressing the threshold questions identified earlier in this summary, respondents offered a variety of ideas and suggestions regarding the structure and format for a dialogue including:

- Product and process for the dialogue: A majority of respondents requested that EPA make clear what type of product or result the Agency envisions from this effort including clarification from EPA on whether or not the Agency is seeking some sort of "consensus" out of the proposed dialogue.

- Location: Most people think the meetings themselves should be based in Rhode Island unless there is a compelling reason to have a meeting in Boston due to the needs of EPA.

- Suggestions regarding meeting format and structure:

    - Several of those interviewed note that any dialogue needs to be structured to ensure that parties do not simply come prepared to "advocate" for their current positions. Rather, these respondents believe that for this dialogue to be truly useful, all parties must understand this is a different type of discussion - not just another forum to participate as "advocates" for their own interests.

    - Many people feel it will be important for meetings to be carefully focused with a moderator or facilitator who can keep people focused on topics being discussed.

    - Those people who had specific ideas about "process" design for a dialogue are uniform in their thinking that if a dialogue occurs, it should be limited to only 2-3 meetings. Several people note that a dialogue needs to be structured so that it is not too labor or time intensive as some people would not be able to contribute fully if the dialogue takes up too much of their time.

    - Many respondents state that EPA needs to be prepared to provide easily understandable background materials to participants prior to each meeting to ensure that everyone is working with the same information.

    - Several respondents feel it is important for EPA to clarify the overall parameters of the dialogue. Current information about the proposed dialogue is too vague for some respondents.

    - Several people think the best way to focus the dialogue on what is realistic and practical is for EPA to present the range of remedies the Agency feels are

acceptable at this site and ask participants one of two questions: 1) Discuss these alternatives and provide us your comments? or 2) Present the range of alternatives and ask participants" what is missing? or which alternative do you like best and why.

- Another idea put forward is for EPA to hold a series of meetings where EPA first lays out information about this site along with alternatives under consideration; next, the parties discuss EPA's alternatives and invent new ones if appropriate and present these ideas to EPA; following participant input, the Agency responds to the questions, ideas, and suggestions posed, and presents and discusses its preferred alternative.

- Suggestions regarding presentation of information:

  - Several parties suggest that graphics, photos, and computer simulation technology could be particularly useful tools to help parties visualize some of the options being discussed. These respondents note that many times parties are more willing and able to talk about ideas different from their own if they can actually "see" what is being proposed by others.

  - As noted earlier, most respondents are uniform in their belief that clear and user friendly background materials will be an important component to a dialogue. Respondents feel that such materials need to be developed and distributed prior to meetings so parties have adequate time to review important data and conclusions before discussion begins.

- Participation in the proposed dialogue: Many respondents offered ideas, comments, and some concerns about "participation" in the proposed dialogue even though no specific questions were posed regarding "participation."

- Respondents were divided in their thoughts about how broadly defined participation should be in this dialogue. Some feel any dialogue needs to be as "inclusive" as possible involving key parties that might not have been involved with or active in this site prior to the dialogue. Others felt just as strongly that a dialogue can only be successful if participation is limited to knowledgeable parties who have been active participants in Centredale activities to date.

Comments related to Agency [state and federal] staff participation in this dialogue:

- Will EPA project staff and other technical staff be active participants in the dialogue, or will they serve primarily as resource people; exactly what role will EPA play in the dialogue; what role will State agency staff play?

- How will other Federal agencies with responsibilities at this site participate? Several agency representatives, interviewed during the assessment, feel they do not need to be involved with this discussion. Rather, they state they can negotiate directly with EPA about what their Agency needs to see as part of the remedy for this site once

EPA has made its decision on a remedy. They do not feel their needs are open to public discussion or negotiation.

Comments related to PRP participation in this dialogue:

- If the PRPs participate, how will EPA ensure that they don't have more resources and representation in the dialogue than organized interest groups?

Comments related to broader public participation in this dialogue [ie, remedy selection]:

- How will the broader public be represented in a dialogue? How does the proposed dialogue fit into ongoing public involvement activities at this site [ie, the Management Advisory Committee]?

- Will elected officials be active participants in a dialogue?

- Can EPA discuss future uses of the river without broader public involvement in a dialogue - in particular greater involvement by area residents and property owners?

- Several respondents suggest the City of Providence needs to be represented in the proposed dialogue especially if EPA believes contamination is likely to migrate further downstream.

- Several respondents state that the Town of Johnston needs to be encouraged to get more actively involved in this site and should be at the table in a dialogue.

What other comments or thoughts do you have regarding the proposed dialogue that we have not discussed?

Most respondents had no additional comments. However, several respondents took this opportunity to reiterate their earlier comments including.

- Several respondents again asked that EPA clarify what final product is intended for this effort.

- Several respondents restated their belief that the proposed dialogue is a good idea, they look forward to participating, but they are also looking for more clarity from EPA regarding key threshold questions raised during the interviews.

- Several respondents again asked that EPA clarify the Agency's thinking about how the broader public fits into the proposed dialogue.

- As noted earlier, there were a number of comments and questions related to PRP-specific issues raised in response to this question. At the request of EPA these comments are not contained in this summary document.

CONCLUSIONS and RECOMMENDATIONS

The recommendations presented in this final section are the conclusions and recommendations of the facilitator alone.

Is a dialogue, involving a wide range of interested parties, regarding remedy selection for the Centredale Manor site, a good idea?

Based upon the information gained through the interviews, it appears that most parties feel the proposed dialogue is a good idea and state they would participate in such a dialogue. It is also apparent from the interviews that many respondents need more information in order to be prepared to fully participate.

Some respondents, while very interested in the idea of the dialogue, were not exactly sure "why" EPA thinks a dialogue at this particular time [ie, prior to issuing the feasibility study for this site] is a good idea. These respondents feel the dialogue may be premature if parties do not have enough information about possible remedial alternatives to properly focus their input and suggestions to EPA.

Therefore, it would be useful for EPA to consider providing more information on the following items either prior to a dialogue beginning or as part of an initial meeting:

- Why does EPA think it is useful to have the proposed dialogue prior to issuance of the feasibility study for this site?

- EPA needs to consider doing more to 'frame the discussion' or more clearly define the overall parameters of the dialogue. This is important in order for all parties to come to a dialogue with appropriately focused expectations. In the absence of clear and well-defined parameters, there is a chance the dialogue will lack the necessary focus for a positive and productive discussion.

- EPA should share more of the Agency's thinking about the purpose and benefits of the proposed dialogue including the Agency's perspective on the benefits and incentives for parties to contribute their individual ideas and perspectives, regarding remedy selection for this site, before the feasibility study is issued.

Regarding "timing" for a dialogue. The overall tone of the interviews suggests that if EPA can address these items, parties will want to participate in a dialogue regarding potential remedies for the Centredale site. If the Agency is prepared to address these items, it will be useful to move forward soon in order to build upon the parties' current interest in the dialogue, and to illustrate why the Agency has suggested that a dialogue occur prior to issuance of the FS.

What issues should be discussed at a dialogue regarding potential remedies for the Centredale Manor site?

Respondents offered a wide range of carefully considered technical and policy-related issues for EPA's consideration in this dialogue. These issues, as presented in this summary, can serve as a useful guide for moving forward with planning if the Agency pursues the proposed dialogue.

To the extent possible, parties need to have a common understanding of what the technical data mean or at least know where questions remain if some of the technical data do not lead to clear conclusions. The parties desire for this type of "factual" information indicates how seriously parties view their responsibility as participants in the proposed dialogue.

Gathering together and presenting the type of information requested by respondents will likely require a significant effort by EPA project staff. If EPA does not feel this type of detailed technical information, with accompanying analysis and conclusions, is appropriate to the dialogue, it would be helpful to explain why. For example, if the Agency envisions more of a "values based" discussion rather than a discussion of technical facts and conclusions, as a basis for discussing potential remedies, then the Agency would want to clearly communicate this to participating parties. The most productive dialogue will require appropriate planning to ensure all parties have an appropriate set of expectations, and that all parties are able to come to the table well equipped to participate effectively.

What format or structure [ie, process design] would be most appropriate for this dialogue?

People are eager to participate in a well-structured and focused dialogue but many will quickly leave the dialogue if they do not understand how the dialogue fits into the Agency's overall ROD decision process. Most respondents believe that a short series of meetings is what is required for the type of dialogue being proposed by EPA. Those interviewed do not want to participate in a series of monthly meetings that last for an indeterminate length of time. They prefer to be engaged intensively over a reasonably short period of time. The interviews suggest that most people are prepared to participate for up to 1-1/2 days at each meeting because shorter meetings may not provide the quality of discussion that EPA and participants are looking for in a dialogue.

EPA will want to consider innovative ways to engage the parties in a dialogue. Standard presentations or a meeting process that does not challenge people to think a bit outside of the box is likely to result in parties assuming more traditional "advocacy" roles during the discussions. This will likely not result in any new or different thinking about remedy selection for this site.

Those interviewed are creative and thoughtful people with many good ideas about what will make a dialogue successful. Many of the parties have prior experience with Superfund actions. EPA would want to use this experience to help develop the specific process design for a dialogue. Several interesting ideas emerged from the interviews that suggest EPA might want to consider designing meeting(s) in such a way that parties who do not normally interact have a chance to work side-by-side on smaller parts of the larger discussion [ie, a remedy for this site] in order to learn more about other parties' perspectives and ideas.

More detailed ideas and suggestions could be offered in followup discussions with EPA project staff, and participating parties, if EPA decides to move forward with this proposed dialogue.

RECOMMENDATIONS

#1: EPA should initiate followup conversations with organized interest groups and PRPs to determine if preliminary meetings with each group [ie, prior to a dialogue] might be useful

The conversations and meetings suggested here provide an opportunity for EPA to address a variety of questions raised during the interviews that are unique to different constituent groups.

- EPA should consider a meeting with organized interest groups and elected officials prior to a dialogue to solicit ideas about how the Agency can ensure a full and robust public outreach effort once EPA has issued a feasibility study for this site. This meeting could also focus attention on how EPA plans to involve the public in the ROD process following the conclusion of the proposed dialogue.

- EPA should consider a meeting [or conference call] with state and federal agency representatives in advance of a dialogue to talk about how each agency wants to participate. Agencies were not uniform in their thinking as to the role they want to play and how they might participate in the proposed dialogue.

- EPA should consider contacting the PRPs to see if EPA can provide assistance in organizing a PRP meeting to address the several issues raised in the phone interviews that fall outside the concept of the proposed dialogue.

#2: EPA should decide whether or not to proceed to plan for a dialogue and communicate its decision to all those who were interviewed.

After EPA has a chance to review this summary document, the project team and the facilitator should meet to discuss the conclusions and recommendations, and to discuss how EPA wants to proceed. If EPA feels the summary provides the information necessary to make a decision about proceeding with a dialogue, then EPA should notify parties what next steps will occur.

If the project team feels they need more information from those interviewed, then EPA might want to contact the parties directly to hear more about the key questions raised during the interviews. Another option is for the Agency to move forward with the "preliminary" meetings suggested in #1 above and use these meetings as an opportunity to clarify and/or address some of the questions raised during the interviews, and to gauge the level of interest by those who might be asked to participate in a dialogue.

#3 EPA should consider structuring a dialogue as a series of meetings

If EPA decides to move forward with a dialogue, several ideas are outlined below to provide a general concept of how a dialogue might be structured. During meeting planning activities, these ideas would be described in more detail with input from EPA and the participating parties.

- Meeting #1: An initial gathering might take the form of a meeting or informal workshop. The initial meeting could be designed to accomplish the following:

    - Agreement among participants on the goals, anticipated outcome, groundrules and procedures that might be useful for the dialogue
    - A shared set of expectations about what types of remedies are possible, and an understanding of how the results of the dialogue will be used by EPA
    - Establishment, by EPA, of the basic factual information [technical and policy related] regarding what is currently known about contamination at this site, etc.

- Meeting #2: A second meeting should provide the opportunity for in-depth discussion, among all parties, regarding possible remedies for this site. The meeting could be designed to accomplish the following:

- Provide an opportunity for a full discussion of possible remedies with all parties able to freely discuss how each option might meet their needs and interests
- Provide an opportunity for participants to "invent" or develop alternatives not currently under consideration by EPA - but within the overall parameters of what EPA says is required and possible at this site
- Provide an opportunity for participants to identify key questions or items they feel EPA needs to address prior to selecting a preferred alternative

- Meeting #3: This meeting should provide all parties with a clear sense of what direction the Agency is moving regarding remedy selection for this site. Additionally, this meeting should confirm for participants how EPA will use their ideas and input from the dialogue. This final meeting might also focus attention on how the broader public could be engaged in decisions regarding a remedy for this site.

Potential resource constraints and challenges related to the proposed dialogue

EPA may want to consider several items that present potential challenges to planning and conducting a successful dialogue:

- Resource constraints: It may take significant staff time to prepare for a dialogue meeting with time spent on developing information and background materials likely to take the greatest amount of time. EPA needs to consider if project staff are available to support these activities in addition to their ongoing project responsibilities.

- Establishing a common base of information and understanding of this information: EPA needs to consider how best to confront the challenges of helping all participants come to a dialogue with a sufficient understanding of technical data and conclusions in order to meaningfully participate. EPA needs to consider how many of the questions raised during the interviews have sufficiently clear and specific answers that they can be addressed for the parties either before or during the dialogue. This includes setting appropriate expectations for participants about what is possible at this site by focusing on what is important to address and what is possible technically and financially.

- Ensuring adequate resources are available for all parties to participate effectively. Some parties are concerned they may not be able to "compete" with the technical knowledge and sophistication of other participating parties. This concern needs to be addressed so that all parties feel they can be effective participants.

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