



December 21, 2012

United States Environmental Protection Agency  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8960

Attention: Ms. Meredith Anderson  
Environmental Engineer

Re: **EPA Comments Dated October 24, 2012**  
**Community Involvement Plan (Revision 1.0)**  
**Walter Coke**  
**3500 35<sup>th</sup> Avenue North**  
**Birmingham, Jefferson County, Alabama**  
**USEPA ID No. ALD 000 828 848**  
Terracon Project No. E1127096

Dear Ms. Anderson:

On behalf of Walter Coke, Inc. (Walter Coke), Terracon Consultants, Inc. (Terracon) is pleased to submit the enclosed revisions to the Community Involvement Plan (*Revision 1.0*) for the above-referenced site. These revisions have been prepared in response to Final Comments dated 12/11/12 for the Community Involvement Plan (CIP) from the United States Environmental Protection Agency (USEPA) Region 4. The individual comments and responses are provided below:

### **General Comment**

The draft CIP is missing several sections of a standard CIP, as outlined in EPA CIP guidance (sub-link to the general public participation links specified in the Order). This particular CIP guidance website (<http://www.epa.gov/superfund/community/pdfs/toolkit/ciplans.pdf>), as well as sample CIPs and their respective websites (e.g., Owens Corning RCRA Facility, Anderson, SC; Hudson River PCB Superfund Site), are suggested resources for Walter Coke in finalizing this CIP. The guidance and examples are noteworthy and should be very helpful in creating a quality, substantive CIP.

### **Walter Coke General Comment Response**

Although public participation activities are not statutorily required under a 3008(h) Order, Walter Coke has agreed to conduct such activities. As the guidance documents provided in direct links in the Order indicate, few cleanups will follow exactly the same course, and facility



Terracon Consultants, Inc. 110 12<sup>th</sup> Street North Birmingham, Alabama 35203  
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owners/operators must be allowed significant latitude to structure the corrective action process, develop cleanup objectives, and select remedies appropriate to facility-specific circumstances. Similar latitude must be allowed in determining the best approach to public participation.

Walter Coke has been a member of the North Birmingham community for over 100 years and has extensive experience in public participation activities in this community. Like all communities, the North Birmingham community has specific and unique circumstances and Walter Coke has developed the CIP utilizing public participation activities that have been successful in this specific community.

However, Walter Coke is willing to consider and welcomes examples of CIP programs that have been successful in other communities.

## **Specific Comments**

### **USEPA Comment No. 1**

Please add more substantial information and suggested community engagement (CE) tasks to the CIP so that this document can be more effective and specific regarding the CE objectives and suite of CE tools to be implemented at technical milestones of the corrective action process. Suggested additional sections of the CIP, as outlined in the CIP guidance (see above), includes:

***Site Description: a description of the site, its history, and the key issues related to the RCRA regulation, site contamination, and the cleanup effort.***

Section 2.0 describes the overall history of the facility itself, but not a brief history of Walter Coke accomplishments under the 1989 RCRA Administrative Order. This addition would facilitate a better understanding of the RCRA technical work Walter Coke has done to date, as well as the community involvement activities undertaken during the past years, such as the Community Advisory Panel (CAP), which has been a vehicle to promote monthly dialogue between citizens and the company.

***Community Profile: a description of the affected community.***

This should include a summary of demographics and identification of significant subgroups in the population, languages spoken, and other important characteristics of the affected community, such as whether the site is located in an area with environmental justice concerns. It also should include information about how the profile was derived.

***Community Needs and Concerns: a summary of community concerns, needs and expectations identified from community interviews and through other communications and experiences with the community.***

This section should identify major concerns or themes that emerge. (No individual interviewees should be identified, however.) This section of the CIP is an opportunity to communicate what has been heard and understood from the community. It should include a discussion of:

- Other sources of information about community needs and concerns and what was learned from these other sources; and
- Other related, but not necessarily RCRA, site-specific environmental issues affecting the community. The CIP can identify resources to meet such community concerns, such as identifying contacts or programs at EPA or other governmental agencies.

***Action Plan: the planned outreach and community involvement activities corresponding to technical site activities.***

This section should include:

- A sequence of CE activities tied to technical milestones in the RCRA corrective action process (with anticipated timeframes);
- Appropriate channels for reaching the community and offering opportunities for input from the community (e.g., news media, community groups, community leaders, local elected officials, social media applications, etc.);
- Recommendations for addressing identified community needs, including providing facilitation or conflict resolution assistance, using translation services, encouraging formation of a Community Advisory Group (CAG) (or strengthening the existing Walter Coke CAP), or offering technical assistance or other services to the community, as appropriate. The CIP also can identify the need for CE tools and techniques to address specific concerns and issues (i.e., preparation of additional fact sheets on specific topics, etc.);
- The location of the information repository;
- References to additional existing information about the site that may answer community concerns, such as past human health risk assessments, fact sheets, etc.
- Possible locations for public meetings or other site-related community involvement activities;
- Discussion of how community feedback was or will be collected and used to develop and revise the CIP;
- Discussion of when and how the CIP will be updated or revised; and
- Sources of other relevant information, as appropriate, as well as identification of emergency response notification systems (text and email notification systems operated by local government) and identification of appropriate places to post notices (physically through signage, for example, and electronically on specified websites, etc.).

***Contact Lists: a reference listing of contacts (name, address, phone, email) useful for the community or the Site Team.***

Consider whether permission should be obtained before including contact information for some of the people listed. This may go into an appendix, especially if it's likely to be revised regularly, and should include contact information for:

- The Site Team;
- Community groups and community leaders;
- Local elected officials;
- Local, state, tribal, and federal agency staff relevant to the site;
- Media contacts (including social media outlets and citizen journalists); and
- Others, as appropriate.

***Optional Sections: as appropriate for the site and community.***

Other elements can be added to the main body or as appendices, such as:

- Executive Summary;
- Glossary of RCRA terms;
- Figures, graphics, or other visual schematics that present the targeted areas and the RCRA cleanup process;
- Communications strategies on specific issues, such as a risk communication strategy;
- Other sections added on a site-specific basis; and
- References or links to relevant existing site information.

**Walter Coke Response No. 1**

Walter Coke has addressed the comment by adding of additional sections to the CIP as described below.

***Site Description:*** Has been added as Section 2.1.

***Community Profile:*** Has been added as Section 3.1.

***Community Needs and Concerns:*** Has been added as Section 3.2.

***Action Plan:*** Has been added as Section 4.0.

***Contact Lists:*** Has been added as Section 6.0.

***Optional Sections:*** Several option sections have also been added to the CIP. An Executive Summary and a description of acronyms has been added. Additional Figures have also been added.

## **USEPA Comment No. 2**

Please add a figure to the document illustrating the 45 SWMUs, 6 AOCs, and 5 SMAs, as well as a figure of the targeted impacted communities for community involvement. This additional visual information will help the community better understand that community involvement will follow technical progress on the SMA areas and help understand their fence-line proximity to those areas.

## **Walter Coke Response No. 2**

Figure 2 has been added which illustrates the 45 SWMUs, 6 AOCs, and 5 SMAs. Figure 3 has been added which shows the location and boundaries of the neighborhoods surrounding the Walter Coke Plant.

## **USEPA Comment No. 3**

Please add a full listing of all stakeholders involved in this project, including but not limited to: Agency contacts; Walter Coke officials and representatives (e.g., Terracon); local officials; neighborhood, civic, church, and stakeholder groups; local grassroots organizations; elected State and Federal officials; Community Advisory Panel (CAP) members; and media contacts. Potential meeting locations, repository locations, and a glossary of terms (such as SWMU, SMA, corrective action, interim measure, etc.) should also be added.

## **Walter Coke Response No. 3**

Section 6.0 Contact list has been expanded. In addition, Appendix A has been added which lists the contact information for local politicians, CAP, neighborhoods, and area churches.

## **USEPA Comment No. 4**

Please add the overall community involvement goals and expand upon the community involvement tools and activities. The EPA believes CE in these communities can be greatly benefited if the current proposed tools (Section 3.0) are expanded upon (currently includes only: Information Repository, Fact Sheets, and Telephone Information Line). As was shared on October 16<sup>th</sup> at your offices, the EPA recommends Walter Coke or its technical representative, Terracon, have a presence at future community meetings (e.g., availability sessions, poster sessions, or traditional public meetings) timed at different milestones or achievements, in order to explain progress being made (in addition to the EPA RCRA Project Manager). Other tools can be referenced on the Community Involvement Toolkit website at <http://www.epa.gov/superfund/community/toolkit.htm>.

Specifically, EPA recommends that you consider adding: 1) the current CAP monthly meetings (similar to the CI Toolkit recommendation of a CAG); 2) the Walter Coke community website and the information/outreach tools included there; 3) public comment periods; 4) public notices (such as the postcard tool used twice in the past 2 years); 5) information/poster sessions; 6) availability sessions; 7) special events, as appropriate; and 8) workshops (as EPA mentioned on 10/16/12, RCRA is planning an introductory environmental education workshop for citizens in the near future); and 9) a site mailing list. EPA would be pleased to have a dialogue with you about how best to present your active use of these proposed tools.

#### **Walter Coke Response No. 4**

Section 3.0 is now Section 4.0. In addition, Section 5.0 was added that discusses EPA's involvement in the CIP activities. We have modified these sections to expand the community involvement activities.

#### **USEPA Comment No. 5**

It is important to note that community involvement is at its best when it timely accompanies site technical activities (as applicable, before, during, and after these are completed). Currently this CIP does not identify any RCRA AOC technical tasks or schedules, and EPA asks that these tasks (i.e., interim measures, CMSs for each SMA, remedy selection, remedy implementation, completion of remedy, etc.) and all corresponding CE activities be outlined in the CIP body, as well as additional details in the appendix, if needed. Please utilize "plain English" as much as possible to clarify this technical work.

#### **Walter Coke Response No. 5**

Section 2.4 has been added that provides technical milestones and dates which are sited in the 2012 RCRA Order.

#### **USEPA Comment No. 6**

Please add that the CIP will be updated by Walter Coke and approved by EPA on, at the minimum, an annual basis so as to keep current with the pace of technical work and the evolution and refinement of the community involvement approaches (e.g., some may work better than others, etc.). EPA considers this a living document.

#### **Walter Coke Response No. 6**

Section 4.6 has been added to address keeping the CIP current.

**Community Involvement Plan (Revision 1.0)**

Walter Coke ■ Birmingham, Alabama

December 21, 2012 ■ Terracon Project No. E1127096



**USEPA Comment No. 7**

Please indicate that: "as necessary, EPA will conduct accompanying community involvement activities to supplement Walter Coke community involvement activities" in a predominant location within the document.

**Walter Coke Response No. 7**

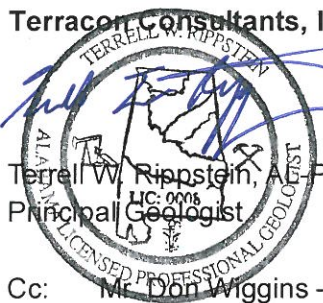
Section 5.0 has been added to address EPA's involvement in the CIP.

**CLOSING**

If you should have any questions, please do not hesitate to contact us at (205) 942-1289.

Sincerely,

**Terracon Consultants, Inc.**

A circular professional seal for Terrell W. Rippstein, a Licensed Professional Geologist in Alabama. The seal contains the text "TERRELL W. RIPPSTEIN", "ALABAMA", "L.C. 0006", and "LICENSED PROFESSIONAL GEOLOGIST". A blue ink signature is written over the seal.  
Terrell W. Rippstein, AL-PG#8  
Principal Geologist

Cc: Mr. Don Wiggins – Walter Coke  
Mr. Dan Grucza – Walter Energy  
ADEM



# COMMUNITY INVOLVEMENT PLAN (REVISION 1.0)

**Walter Coke**  
**3500 35<sup>th</sup> Avenue North**  
**Birmingham, Jefferson County, Alabama**  
**USEPA ID No. ALD 000 828 848**  
December 21, 2012  
Terracon Project No. E1127096



**Prepared for:**  
Walter Coke  
Birmingham, Alabama

**Prepared by:**  
Terracon Consultants, Inc.  
Birmingham, Alabama

Offices Nationwide  
Employee-Owned

Established in 1965  
[terracon.com](http://terracon.com)

# Terracon

Geotechnical   ■   Environmental   ■   Construction Materials   ■   Facilities





December 21, 2012

Walter Coke  
3500 35<sup>th</sup> Avenue North  
Birmingham, Alabama 35007

Attention: Mr. Don Wiggins

Re: **Community Involvement Plan**  
**Walter Coke**  
**3500 35<sup>th</sup> Avenue North**  
**Birmingham, Jefferson County, Alabama**  
**USEPA ID No. ALD 000 828 848**  
Terracon Project No: E1127152

Dear Mr. Wiggins:

Terracon Consultants, Inc. has prepared this Community Involvement Plan (CIP) per your request for the above referenced site.

This plan has been prepared to be consistent with the following EPA guidance as stated in the executed RCRA Section 3008(h) Administrative Order on Consent (effective 9/24/12):

<http://www.epa.gov/oswer/engagementinitiative/related.htm>

<http://www.epa.gov/wastes/hazard/tsd/permit/pubpart/manual.htm>

The CIP will serve as guidance to engage the public and promote understanding and participation in the RCRA process. If you have any questions, please call me.

Sincerely,  
**Terracon Consultants, Inc.**



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Geotechnical



Environmental



Construction Materials



Facilities

## **EXECUTIVE SUMMARY**

Walter Coke has prepared this Community Involvement Plan (CIP) to inform and involve the community in the technical environmental activities being performed on the Walter Coke facility property located at 3500 35<sup>th</sup> Street North, Birmingham, Jefferson County, Alabama.

This Community Involvement Plan (CIP) has been prepared to facilitate communication between the community and Walter Coke. Walter Coke will utilize the community involvement activities outlined in this plan to ensure that residents are reasonably informed of milestones associated with the technical work being performed under the RCRA Section 3008(h) Administrative Order on Consent (effective 9/24/12) [AOC].

Walter Coke has a long history of community involvement. Like all communities, the North Birmingham community has specific and unique circumstances and Walter Coke has developed the CIP utilizing public participation activities that have been successful in this specific community and are consistent with EPA community engagement guidance. Walter Coke will use a variety of ways to engage the public on the activities being conducted at the Walter Coke Plant under the AOC, including maintaining an information repository, distributing fact sheets at key milestones, and operating a telephone information line.

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## **FIGURES**

Figure 1	Site Location Map
Figure 2	Site Map
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## **APPENDICIES**

Appendix A	Contact Information for Churches, CAP, and Neighborhood Associations
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## Acronyms and Abbreviations

ADEM	Alabama Department of Environmental Management
AOC	area of concern
ASTM	American Society for Testing and Materials
BERA	baseline ecological risk assessment
BTF	biological treatment facility
CEM	conceptual exposure model
CIP	Community Involvement Plan
COPC	constituent of potential ecological concern
CMS	Corrective Measures Study
DPT	direct-push technology
ECHO	Enforcement & Compliance History Online
EPA	U.S. Environmental Protection Agency
ERA	ecological risk assessment
ESV	ecological screening value
FCHP CAP	Fairmont, Collegeville, and Harriman Park Community Advisory Panel
FCP	former chemical plant
FID	flame ionizing detection
FMC	Five Mile Creek
GIS	geographic information system
GPS	global positioning system
HHC	Hillsborough Holding Corporation
HHRA	human health risk assessment
HSDB	Hazardous Substances Data Bank
HSWA	Hazardous and Solid Waste Amendments
IM	Interim Measures
MATC	maximum acceptable toxicant concentration
MCL	maximum contaminant level
NAPL	non-aqueous phase liquid
NPDES	National Pollutant Discharge Elimination System
Order	Administrative Order on Consent
OSHA	Occupational Safety and Health Administration
PPE	personal protective equipment
PSV	preliminary screening value
QC	quality control
RBSL	risk based screening level
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
SMA	SWMU Management Area
SWMU	Solid Waste Management Area
VI	Vapor Intrusion

**Community Involvement Plan**  
**Walter Coke, Inc.**  
**3500 35<sup>th</sup> Avenue North**  
**Birmingham, Jefferson County, Alabama**  
**USEPA ID No. ALD 000 828 848**

Terracon Project No. E1117096  
December 21, 2012

## **1.0 INTRODUCTION**

### **1.1 What is RCRA?**

RCRA is the Resource Conservation and Recovery Act, which was enacted by Congress in 1976. RCRA's primary goals are to protect human health and the environment from the potential hazards of waste disposal, to conserve energy and natural resources, to reduce the amount of waste generated, and to ensure that wastes are managed in an environmentally sound manner. RCRA regulates the management of solid waste (e.g., garbage), hazardous waste, and underground storage tanks holding petroleum products or certain chemicals.

### **1.2 Community Involvement Plan**

This Community Involvement Plan (CIP) has been prepared to facilitate communication between the community and Walter Coke. Walter Coke will utilize the community involvement activities outlined in this plan to ensure that residents are reasonably informed of specific milestones associated with the work being performed under the RCRA Section 3008(h) Administrative Order on Consent (effective 9/24/12) [AOC]. Although there are no regulations requiring public participation under 3008(h) Orders, Walter Coke has agreed to develop and implement this CIP to facilitate communication between the community and Walter Coke.

This CIP will be updated on at least an annual basis.

## **2.0 SITE BACKGROUND**

### **2.1 Site Description**

Walter Coke is located in North Birmingham, Jefferson County, Alabama (Figure 1). The site occupies approximately 400 acres, with the main entrance near the intersection of 35th Avenue and Shuttlesworth Drive in Birmingham.

Walter Coke is a leading producer of coke that is used in blast furnaces and foundries. The majority of this product is purchased by steel producers who use it to make their products. Walter Coke uses methods and technology that are among the most advanced in the industry.

### **2.2 Site History**

The roots of the facility can be traced back to 1881 when Sloss-Sheffield Steel and Iron Company first began producing pig iron in Birmingham, Alabama. In 1920 where Walter Coke sits today, Sloss-Sheffield Steel and Iron Company built two modern coke oven batteries, at the time considered state-of-the-art, to serve its own needs as well as those of other customers. As Birmingham's steel industry grew, so did the need for furnace coke, which prompted the construction of three more batteries at the site during the 1950s.

As American industry evolved in the ensuing years, so did Walter Coke (formerly known as Sloss Industries). Today, Walter Coke is a highly efficient, technologically advanced operation serving a variety of customers in the furnace and foundry markets.

The operation now consists of three batteries with a total of 120 coke ovens which produce approximately 460,000 tons of coke each year. A highly experienced operating staff provides assurance of adherence to strict operating, environmental, and safety standards.

The original coke manufacturing facility began operation in 1920 as Sloss Sheffield Steel and Iron Company. Beginning in 1952, the company experienced a series of corporate transactions and restructurings that culminated in the name change to Walter Coke in May 2009. The following operations have occurred at the facility:

- Coke manufacturing has occurred since 1920 and 120 coke ovens continue to operate.
- Chemical manufacturing began at the facility in 1948 and all chemical manufacturing operations ceased in 2002.

- An iron blast furnace that produced pig iron from iron ore began operation in 1958; blast furnace operations ceased in 1981, and the blast furnace was decommissioned in 1984.
- The mineral wool plant which manufactured mineral fiber used in the production of ceiling tile and insulating products was built in late 1947 and was decommissioned in 2010.
- The biological treatment facility (BTF), designed to treat wastewater generated at the facility, was constructed in 1973-74, first received wastewater in 1975 and is still in operation today.

The land around the Walter Coke facility is zoned for industrial and residential use. Before 1957, the area was primarily industrial, with significant numbers of other facilities, including coke and cement manufacturing plants, pipe manufacturing plants, and limestone quarry operations. Residential neighborhoods were constructed on properties in the area of Walter Coke and these other industrial operations only after 1957 (EPA, 1990). The realistic future land use for the Walter Coke facility is industrial.

## **2.3 1989 RCRA Order**

The following provides a brief chronological overview of the regulatory history associated with the 1989 RCRA Order:

- August 1989 - EPA completed the RFA.
- September 29, 1989 - Section 3008(h) Administrative Order 89-39-R was issued to Walter Coke to perform an RFI and to perform a Corrective Measures Study (CMS).
- October 24, 1990 – After a challenge to the 1989 Administrative Order, EPA and the company entered into a Modification to the Administrative Order and Settlement Agreement, which then governed work at the facility.
- 1990 to 1994: Walter Coke initiated planning for the RFI to characterize the nature, extent, and rate of contaminant migration from the identified SWMUs, and submitted a draft RFI Work Plan to EPA for review and approval.
- The RFI Work Plan, which outlined an approach for investigating the 39 SWMUs, was approved by EPA in 1994.
- 1995 and 1996: A Facility-Wide Investigation (FWI) was completed to develop a conceptual hydrogeologic and hydrologic model of the facility.
- 1996 to 1999: RFI field investigations were conducted and reports submitted to EPA.
- 2000 to 2001: Phase II field investigations were conducted.
- 2002: Interim Remedial Measures (IM) Work Plan for the Chemical Plant was submitted to EPA.



In an effort to help EPA complete its environmental indicator (EI) determinations for the site and thereby help EPA meet its Government Performance Results Act (GPRA) goal to show that human exposures and groundwater releases were controlled by September 30, 2005, Walter Coke completed the following activities that are specific for EI determination:

- February 2005 – Walter Coke submits the Proposed EI Sampling Plan.
  - March 2005 – EPA approves the EI Sampling Plan.
- July 2005 - Walter Coke submits the Consolidated Overview of Environmental Data in Support of the EI Determination.
  - September 30, 2005 – EPA issued the final EI evaluation of the facilities status in relation to RCRA Information System (RCRIS) CA Codes 725 and 750. The CA 725 decision was noted as “Yes”; the CA 750 decision was noted as “No”.

Following the completion of the EI activities, EPA and Walter Coke focused on the next phase of RFI activities.

- 2006: EPA issued technical comments on several RFI reports.
- 2007 – Phase III RFI Work Plan prepared and approved by EPA.
- 2009 – Walter Coke submits the Draft Phase III RFI Report.
  - June 2009 – Walter Coke submits Addendum to the Phase III report.

## **2.4 2012 RCRA Order**

A RCRA Section 3008(h) Administrative Order on Consent (Order) with the effective date of September 24, 2012, was signed by Walter Coke and the EPA. The 2012 Order declared that all of the approved investigation tasks of the RFI Work Plans required by the 1989 Order had been completed by Walter Coke and that the 1989 Order was terminated and no longer in effect. In the 2012 Order, there are 45 SWMUs, 6 AOCs, and 5 SMAs at the facility (Figure 2) listed.

As part of the Order, a Corrective Measures Study (CMS) is being prepared for each of the 5 SMAs to evaluate the need, if any, for corrective measures. The scheduled completion dated for each CMS is:

- CMS SMA 1 – March 25, 2013
- CMS SMA 2 – June 21, 2013
- CMS SMA 3 – September 24, 2013
- CMS SMA 4 – June 24, 2014
- CMS SMA 5 – September 24, 2014

In addition to the CMS, Interim Measures (IM) are being conducted in the area of SMA 4 to address groundwater impacts largely confined to the site. The IM consists of hydraulic control

of the groundwater in AOC D (FCP Groundwater Plume), groundwater sampling and analysis, and a Vapor Intrusion (VI) Study. The EPA has approved the IM, the Groundwater Sampling and Analysis Plan, and the VI.

## **2.5 CHFP Citizens Advisory Panel**

Walter Coke has a long standing dialog with the surrounding community. The Collegeville, Fairmont and Harriman Park (CHFP) Citizens Advisor Panel (CAP) was designed to serve as a liaison between Walter Coke and the surrounding communities of Collegeville, Fairmont and Harriman Park. The CAP promotes two-way communication between the community and Walter Coke. The membership includes a wide cross-section of concerned residents and neighborhood leaders.

## **3.0 COMMUNITY BACKGROUND**

### **3.1 Community Profile**

According to the US EPA Enforcement & Compliance History Online (ECHO), the community demographics within a 3-mile radius of the Walter Coke facility are the following:

- Households – 15,623
- Housing units – 18,353
- Total persons – 41,962
- Population density – 1,486.43 per square mile
- Households on public assistance – 811
- Percent minority – 80.53%
- Persons below poverty level – 14,150

Figure 3 illustrates the boundaries of the Fairmont, Harriman Park, and Collegeville neighborhoods. In addition, the location of the Walter Coke Plant is shown.

### **3.2 Community Concerns**

The community can express their concerns, if any, via a telephone information line set up by Walter Coke. The phone number for the information line is 205-241-5420. The community can express their concerns or request information. The community can request information such as contact information for EPA or other governmental agencies and other related site-specific environmental issues.

Past community concerns that have been brought to the attention of and addressed by Walter Coke include: truck traffic; dust control; and site aesthetics (i.e., new fencing).

The community feedback received each year will be reviewed and used as appropriate to update or revise the CIP on at least a yearly basis. We will also continue to evaluate how feedback is received and information is dispersed to the community (i.e., texting, social media, physical signage, etc.)

## **4.0 ACTION PLAN**

More than 5,000 facilities in the United States are subject to RCRA corrective action. The degree of cleanup necessary varies significantly across these facilities. Few of these activities will follow exactly the same course; therefore, program implementers and facility owners/operators must be allowed significant latitude to structure the corrective action process, develop cleanup objectives, and select remedies appropriate to facility-specific circumstances. Similar latitude must be allowed in determining the best approach to public participation based on the history and uniqueness of each facility.

Walter Coke has a long history of community involvement. Based on this history and what has shown to be the most effective and consistent with EPA community engagement guidance, Walter Coke will use a variety of ways to engage the public on the activities being conducted at the Walter Coke Plant under the Administrative Order on Consent, including maintaining an information repository, distributing fact sheets at key milestones, and operating a telephone information line.

The following entities will be used as channels for reaching the community and offering opportunities for input from the community:

- US EPA
- ADEM
- Local elected officials
- Local churches
- The Fairmont, Collegeville, and Harriman Park Community Advisory Panel (FCHP CAP)
- The neighborhood associations of Harriman Park, Collegeville, and Fairmont.

The contact information for these entities is included in Section 6.0 and Appendix A.

The following sections describe public involvement activities that Walter Coke will use, their purposes, and descriptions of how the activities will be used.

### **4.1 RCRA Technical Milestones**

The RCRA technical milestones were presented in Section 2.4. As each Report is finalized and approved by EPA, one or more of the community involvement activities provided in the following sections will be conducted by Walter Coke. In addition to the technical milestones, Walter Coke will use these community involvement activities whenever the need arises to engage or inform the public about events or other specific concerns and issues that arise.

## **4.2 Information Repository**

An Information Repository is a place where the public may read and review site information, including documents that are the subject of public comment.

For this project, the information repository is located at:

North Birmingham Public Library, 2501 31<sup>st</sup> Avenue North, Birmingham, Alabama 35207  
Phone (205) 226-4025

This information repository also has previously conducted reports.

## **4.3 FHCP CAP Meetings**

The FHCP CAP meetings will be used to present information on the technical environmental activities being conducted at the site pursuant to the September 24, 2012 RCRA Section 3008(h) Order. Walter Coke will provide facts sheets for the meetings as technical milestones are met. In addition, Walter Coke will provide a summary of such environmental activities currently being conducted to discuss at the CAP meetings.

## **4.4 Fact Sheets**

Walter Coke plans to prepare and distribute fact sheets at key milestones (e.g., Interim Measures Report, Corrective Measures Study) over the course of the project. The fact sheets are intended to inform the community of comment opportunities and important site activities. These fact sheets will be provided to local churches, to the FCHP CAP for their meetings, and to the neighborhood associations of Harriman Park, Collegeville, and Fairmont. A contact information list is provided in Appendix A.

These fact sheets will also be available on the Walter Coke website at <http://waltercokefacts.com>. Walter Coke may also email or mail fact sheets about the progress of site activities upon written request.

Walter Coke will make the fact sheets available to EPA to post on their website at [http://www.epa.gov/region4/foia/readingroom/rcra\\_community/walter.html](http://www.epa.gov/region4/foia/readingroom/rcra_community/walter.html).

## **4.5 Telephone Information Line**

As described in Section 3.2 above, a telephone information line has been set up at 205-241-5420.

Feedback received at the hot line will be used to revise the CIP during subsequent updates.

## **4.6 CIP Revisions**

The CIP will be updated at a minimum on an annual basis so as to keep current with the pace of technical work being performed. In addition, the community involvement approaches will be refined if needed to keep current with what works and new involvement opportunities. Both EPA and Walter Coke consider the CIP a living document.

## **5.0 EPA'S COMMUNITY INVOLVEMENT**

The EPA, as necessary, will conduct community involvement activities complementary to and to supplement Walter Coke's. The EPA will be the face of the technical environmental activities conducted at the site. EPA's activities may include:

- Conducting Public Meetings to discuss specific RCRA milestones;
- Conducting Workshops to discuss the RCRA process;
- Conduct special events as appropriate;
- Public Comment Periods on Corrective Measures or other site activities, as necessary.



## **6.0 CONTACT LIST**

The EPA and Walter Coke contacts are listed below

### **EPA Project Officer**

Meredith Anderson, Environmental Engineer, RCRA Division  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street  
Atlanta, Georgia 30303

Phone: 404.562.8608 (w)  
E-mail: [Anderson.meredith@epa.gov](mailto:Anderson.meredith@epa.gov)

### **Walter Coke Contact**

Don Wiggins, Manager of Technical Services  
Walter Coke  
3500 35<sup>th</sup> Avenue North  
Birmingham, Alabama 35007

Information Line: 205- 241-5420

### **Alabama Department of Environmental Management**

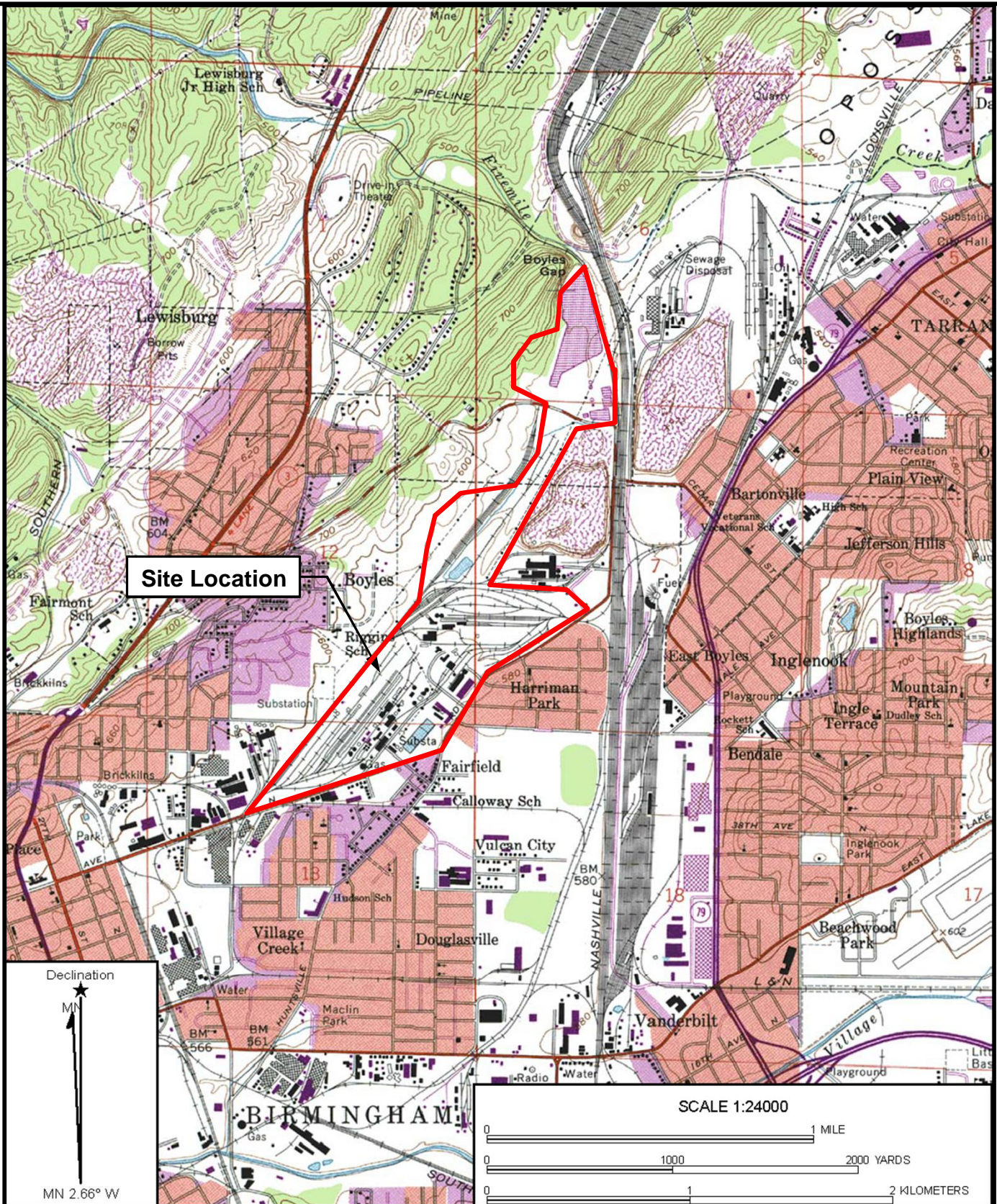
ADEM  
1400 Coliseum Blvd  
Montgomery, Alabama 36110

Phone : 334-271-7700

A list and contact information for the local politicians, the CHFP CAP, neighborhood contacts, and local churches are presented in Appendix A.

## Figures





Name: Birmingham North, AL  
Date: 1959, photorevised 1970,  
photoinspected 1978

Scale: 1 inch = 2,000

Location: 033° 34' 09.52" N 086° 47' 42.31" W

**Terracon**

**PROJECT**

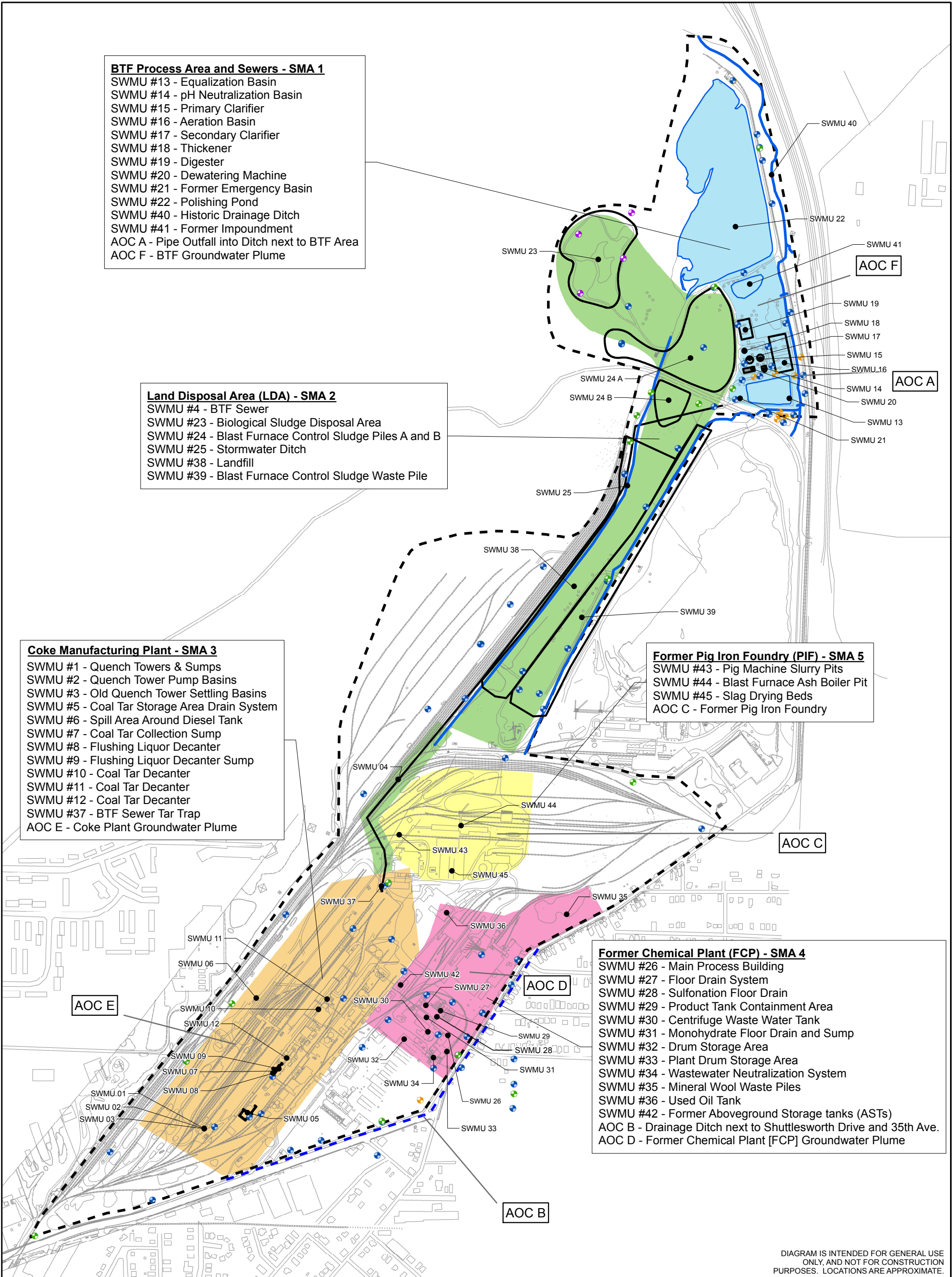
WALTER COKE  
3500 35<sup>TH</sup> AVENUE NORTH  
BIRMINGHAM, ALABAMA  
TERRACON PROJECT NO.: E1127051

**FIGURE 1**

**TOPOGRAPHIC MAP**

Scale As Noted





**BTF Process Area and Sewers - SMA 1**  
SWMU #13 - Equalization Basin  
SWMU #14 - pH Neutralization Basin  
SWMU #15 - Primary Clarifier  
SWMU #16 - Aeration Basin  
SWMU #17 - Secondary Clarifier  
SWMU #18 - Thickener  
SWMU #19 - Digester  
SWMU #20 - Dewatering Machine  
SWMU #21 - Former Emergency Basin  
SWMU #22 - Polishing Pond  
SWMU #40 - Historic Drainage Ditch  
SWMU #41 - Former Impoundment  
AOC A - Pipe Outfall into Ditch next to BTF Area  
AOC F - BTF Groundwater Plume

**Land Disposal Area (LDA) - SMA 2**  
SWMU #4 - BTF Sewer  
SWMU #23 - Biological Sludge Disposal Area  
SWMU #24 - Blast Furnace Control Sludge Piles A and B  
SWMU #25 - Stormwater Ditch  
SWMU #38 - Landfill  
SWMU #39 - Blast Furnace Control Sludge Waste Pile

**Coke Manufacturing Plant - SMA 3**  
SWMU #1 - Quench Towers & Sumps  
SWMU #2 - Quench Tower Pump Basins  
SWMU #3 - Old Quench Tower Settling Basins  
SWMU #5 - Coal Tar Storage Area Drain System  
SWMU #6 - Spill Area Around Diesel Tank  
SWMU #7 - Coal Tar Collection Sump  
SWMU #8 - Flushing Liquor Decanter  
SWMU #9 - Flushing Liquor Decanter Sump  
SWMU #10 - Coal Tar Decanter  
SWMU #11 - Coal Tar Decanter  
SWMU #12 - Coal Tar Decanter  
SWMU #37 - BTF Sewer Tar Trap  
AOC E - Coke Plant Groundwater Plume

**Former Pig Iron Foundry (PIF) - SMA 5**  
SWMU #43 - Pig Machine Slurry Pits  
SWMU #44 - Blast Furnace Ash Boiler Pit  
SWMU #45 - Slag Drying Beds  
AOC C - Former Pig Iron Foundry

**Former Chemical Plant (FCP) - SMA 4**  
SWMU #26 - Main Process Building  
SWMU #27 - Floor Drain System  
SWMU #28 - Sulfonation Floor Drain  
SWMU #29 - Product Tank Containment Area  
SWMU #30 - Centrifuge Waste Water Tank  
SWMU #31 - Monohydrate Floor Drain and Sump  
SWMU #32 - Drum Storage Area  
SWMU #33 - Plant Drum Storage Area  
SWMU #34 - Wastewater Neutralization System  
SWMU #35 - Mineral Wool Waste Piles  
SWMU #36 - Used Oil Tank  
SWMU #42 - Former Aboveground Storage tanks (ASTs)  
AOC B - Drainage Ditch next to Shuttlesworth Drive and 35th Ave.  
AOC D - Former Chemical Plant [FCP] Groundwater Plume

Legend

- Proposed Solid Waste Management Areas (SMAs)**
- BTF Process Area and Sewer - SMA 1
  - Land Disposal Area - SMA 2
  - Coke Manufacturing Plant - SMA 3
  - Former Chemical Plant - SMA 4
  - Former Pig Iron Foundry - SMA 5

- Notes:**
- 1) SWMU - Solid Waste Management Unit
  - 2) Management Area boundaries are used for approximation.
  - 3) AOC - Area of Concern



Project Mngr:	TWR
Checked By:	TWR
Approved By:	TWR
Drawn By:	GFA

Scale:	SHOWN
Date:	7/24/2012
Project No:	E1127096
File Name:	Figure 1

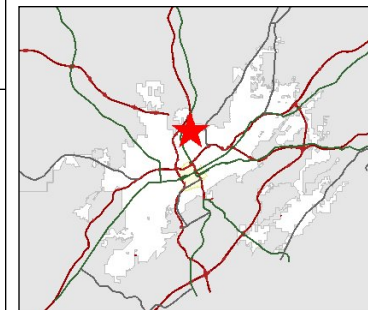
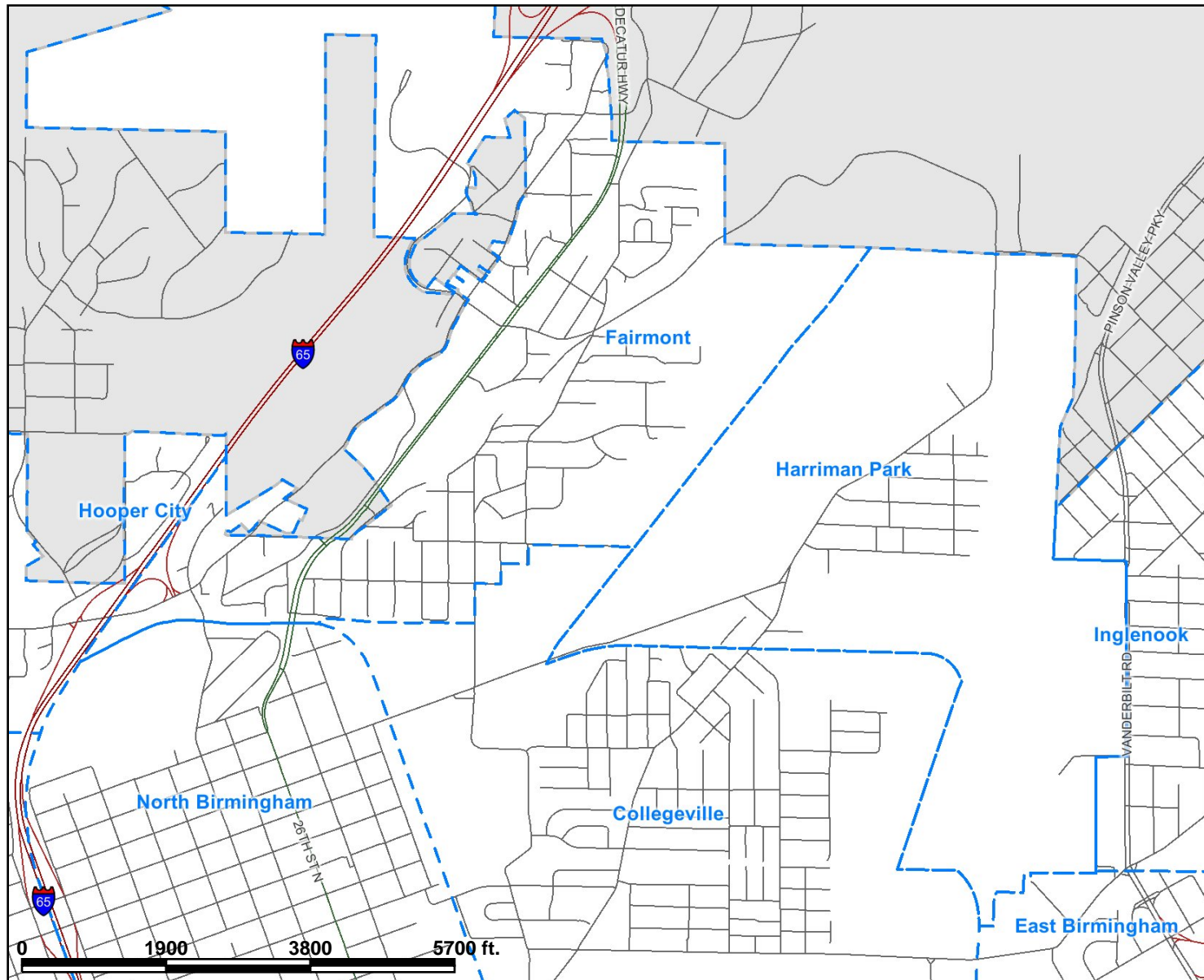
**Terracon**  
Consulting Engineers & Scientists  
110 12th St. North  
Birmingham, Alabama 35203  
Phone: (205) 942-1289 Fax: (205) 443-5302

SITE MAP	
CLIENT:	<b>Walter Coke</b> 3500 35th Avenue North Birmingham, AL 35207

FIGURE
G1



## CITY OF BIRMINGHAM ONLINE MAPPING



### Legend

- Neighborhood Boundary
- City Limits



Scale: 1:24,731



The City of Birmingham makes no warranty, expressed or implied, as to the accuracy of the information represented herein. This map is a user generated static output from an Internet mapping site and is for general reference only.

<http://gisweb.informationbirmingham.com>

Map Created: December 17, 2012

Figure

**Appendix A**  
**List of Area Contacts**



### **Local Political Contacts**

#### **Councilor Maxine Parker – Birmingham City Council**

Cell – (205)335-5138

Office – (205) 254-2464

[Maxine.parker@birminghamal.gov](mailto:Maxine.parker@birminghamal.gov)

### **CHFP CAP Contacts**

#### **CHFP CAP**

Meeting Dates and Location:

Last Friday of each month 10:00 a.m.

Northside Church of God

2873 41st Avenue North

**John Toyer - Contact**

Cell - (205) 706-9917

### **Neighborhood Contacts**

#### **Fairmont Neighborhood Association**

Meeting Dates and Location:

First Tuesday of each month 6:00 p.m.

Northside Church of God

2873 41st Avenue North

**Ronald Mitchell, President**

Home - (205) 841-3786

Cell - (205) 478-6575

#### **Collegeville Neighborhood Association**

Meeting Dates and Location:

First Monday of every month 6:30 p.m.

JCCEO Center (Calloway School)

3417 34th Terrace North

**Vivian Starks – President**

Home – (205) 841-6502

#### **Harriman Park Neighborhood Association**

Meeting Dates and Location:

Fourth Thursday of every month 6:30 p.m.

Harriman Park recreational Center

4349 Shuttlesworth Drive

**Jones Monday**

Home – (205) 849-7715

Cell – (205) 568-5815



**North Birmingham Public Library**

2501 31<sup>st</sup> Avenue North

Birmingham, AL 35207

(205) 226-4025

Hours: Monday – Tuesday 9-8; Wednesday – Saturday 9-6; Sun. 2-6

**Harriman Park Recreational Center**

4345 Shuttlesworth Drive

Birmingham, AL 35207

**List of Area Churches**

First Baptist Church of Birmingham, 3601 44th Avenue North, Birmingham, AL 35207

New Allen Temple AME Church, 4353 F L Shuttlesworth Dr, Birmingham, AL 35207

New Progress Baptist Church, 3416 34th Ter N, Birmingham, AL 35207

St. Tabernacle Methodist Church, 3244 Pearl Ave, Birmingham, AL 35207

Northside Church of God, 2873 41st Ave North, Birmingham, AL 35207

Friendship Baptist Church, 3351 30th Place North, Birmingham, AL 35207

Mt. Olive Community Church, 3345 32nd Street North, Birmingham, AL 35207

Peace Baptist Church, 3400 34th Street North, Birmingham, AL 35207

Christian Valley Baptist Church, 3104 33rd Ter N, Birmingham, AL 35207

Collegeville Church of Christ, 3301 32nd Street North, Birmingham, AL 35207

Shady Grove Baptist Church, 3444 31st Way N, Birmingham, AL 35207

Trinity Church, 3013 Shuttlesworth Dr., Birmingham, AL 35207

Antioch Baptist Church, 3309 33rd St N, Birmingham, AL 35207

The Apostolic Faith Church, 3925 Fairmont St, Birmingham, AL 35207

Bethel Baptist Church, 3200 28th Ave N, Birmingham, AL 35207

Bryant Fountain of Love Baptist Church, 2130 31st Ave N, Birmingham, AL 35207

Christian Valley Baptist Church, 3104 33rd Ter N, Birmingham, AL 35207

Church Without Walls, 2911 49th Ave N, Birmingham, AL 35207

Collegeville Church of Christ, 3301 32nd St N, Birmingham, AL 35207

Evergreen Missionary Baptist Church, 3013 56th Ave N, Birmingham, AL 35207

Flat Hill Baptist Church, 4164 23rd Way N, Birmingham, AL 35207

Followers of Christ Outreach Ministry, 4320 Cheek Rd, Birmingham, AL 35207

The Glorious Church of God in Christ, 4008 24th St N, Birmingham, AL 35207

Greater Antioch Baptist Church, 3441 27th Ct N, Birmingham, AL 35207

Greater New Height Baptist Church, 2101 34<sup>th</sup> Avenue N, Birmingham, AL 35207

Joyful News Christian Church, 2610 29th Ave N, Birmingham, AL 35207

Livestone Missionary Baptist Church, 3421 31st Pl N, Birmingham, AL 35207

Morningstar Baptist Church, 100 40th Ave N, Birmingham, AL 35207

Mount Olive Missionary Baptist Church, 2409 40th Ave N, Birmingham, AL 35207

Mt. Pilgrim Baptist, 2500 35<sup>th</sup> Avenue N, Birmingham, AL 35207

Mount Pleasant Pbc Church, 3120 29th Ave N, Birmingham, AL 35207

Mount Pleasant United Methodist Church, 4048 Church St N, Birmingham, AL 35207

Mt Calvary Baptist Church, 3109 44th Ter N, Birmingham, AL 35207

Mt Carmel Christian Church, 5110 Cheek Rd, Birmingham, AL 35207

New Georgia Baptist Church, 5300 Decatur Hwy, Birmingham, AL 35207

New Hope Baptist Church of Collegeville, 3356 33rd St N, Birmingham, AL 35207

New Mount Olive Baptist Church, 4124 26th St N, Birmingham, AL 35207

New Rising Star Baptist Church, 3104 33rd Pl N, Birmingham, AL 35207  
Olivet Monumental Baptist Church, 2516 33<sup>rd</sup> Avenue N, Birmingham, AL 35207  
Overcomers by Faith Church, 2820 29th Ave N, Birmingham, AL 35207  
Pilgrim Home Baptist Church, 101 40th Ct W, Birmingham, AL 35207  
Providence Baptist Church, 3619 2nd Pl W, Birmingham, AL 35207  
Saint Paul Baptist Church, 4699 Cheek Road, Birmingham, AL 35207  
Zion Hope Baptist Church, 2808 32<sup>nd</sup> Avenue N, Birmingham, AL 35207  
St Mark Baptist Church, 3520 Fl Shuttlesworth Dr, Birmingham, AL 35207  
Greater Works Baptist Church, 3420 27<sup>th</sup> Street N, Birmingham, AL 35207  
Thirtieth Avenue Church of Christ, 1700 30th Ave N, Birmingham, AL 35207  
True House of Prayer Baptist Church, 4100 29th St N, Birmingham, AL 35207  
Wilson Chapel Baptist Church, 3401 31st Ave N, Birmingham, AL 35207  
Word of Truth Ministry, 2509 27th Ave N, Birmingham, AL 35207  
Wright's Chapel United Methodist Church, 2133 32nd Ave N, Birmingham, AL 35207  
Zion Hope Baptist, 2808 32nd Ave N, Birmingham, AL 35207  
A W Holy Church of the True, 2424 30<sup>th</sup> Avenue N, Birmingham, AL 35207  
Sacred Heart Church, 3401 27<sup>th</sup> Court N, Birmingham, AL 35207