



U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

Catalyst for Improving the Environment

Evaluation Report

An Overall Strategy Can Improve Communication Efforts at Asbestos Superfund Site in Libby, Montana

Report No. 11-P-0430

August 3, 2011



Report Contributors:

Ganesa Curley
Allison Dutton
Christine El-Zoghbi
Ryan Patterson
Wendy Wierzbicki
Martha Chang
Eric Lewis

Abbreviations

CEP	Community engagement plan
CIP	Community involvement plan
EPA	U.S. Environmental Protection Agency
ERS	Environmental resource specialist
FAQs	Frequently asked questions
OIG	Office of Inspector General
OU	Operable unit

Cover photos: *from left:* EPA information center staff, Libby, Montana; handouts at the EPA information center. (EPA photos)

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At a Glance

Catalyst for Improving the Environment

Why We Did This Review

In response to a congressional request, we evaluated how the U.S. Environmental Protection Agency (EPA) communicates information to the public at the Libby Asbestos Superfund Site in Libby, Montana.

Background

The Libby site includes portions of the towns of Libby and Troy, Montana. An inactive vermiculite mine contaminated with naturally occurring asbestos is located 7 miles outside of Libby. About 12,000 people live within a 10-mile radius of the town of Libby. EPA has conducted cleanup activities at the Libby site since 2000. EPA policy on community involvement goes beyond the letter of the law and recommends implementing additional activities to ensure community participation in the Superfund cleanup process.

For further information, contact our Office of Congressional, Public Affairs and Management at (202) 566-2391.

The full report is at: www.epa.gov/oig/reports/2011/20110803-11-P-0430.pdf

An Overall Strategy Can Improve Communication Efforts at Asbestos Superfund Site in Libby, Montana

What We Found

Region 8 does not have an overall communication strategy to guide, coordinate, and evaluate its communication efforts at the Libby Asbestos Superfund Site. Despite extensive communication efforts that exceed minimum Superfund requirements, Region 8 has not fully satisfied community concerns about health risk or effectively communicated the limitations of its risk assessment. Libby residents repeatedly raised questions about recontamination and EPA's ongoing and planned activities, including the cleanup of operable unit 1 and activity-based sampling events, even though Region 8 has provided information on those subjects. Recurring questions may signify that Region 8 needs to address them more clearly.

We also found that some Region 8 outreach products may be difficult for Libby residents to understand. Some materials intended for the general public are written for a highly educated audience. Understandable outreach products ensure that Region 8's messages are successfully communicated to the public.

An overall communication strategy could help Region 8 assess the effectiveness of and improve its communication activities. Region 8's community engagement plan could serve as the overall communication strategy with the addition of guidance-recommended elements. These elements include key messages, timelines, measures of success, and mechanisms for identifying public concerns and obtaining public feedback. The addition of these elements to the community engagement plan may assist EPA in better addressing community concerns and helping the public make informed decisions regarding risk.

What We Recommend

We recommend that the EPA Region 8 Regional Administrator ensure that Libby outreach products are readable for a general audience. We also recommend that the Regional Administrator revise the Libby community engagement plan to serve as the overall communication strategy by adding key messages to address specific public concerns and site activities, timelines for community involvement activities and outreach products, measures for successful communication, and mechanisms for identifying community concerns and collecting feedback. We also recommend implementing a process for ongoing evaluation of Region 8's communication. Region 8 agreed to take sufficient corrective actions.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

THE INSPECTOR GENERAL

August 3, 2011

MEMORANDUM

SUBJECT: An Overall Strategy Can Improve Communication Efforts at
Asbestos Superfund Site in Libby, Montana
Report No. 11-P-0430

FROM: Arthur A. Elkins, Jr.
Inspector General

A handwritten signature in black ink, appearing to read "Arthur A. Elkins, Jr.", is written over the printed name and title.

TO: James B. Martin
Regional Administrator, EPA Region 8

This is a report on the subject evaluation conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

The estimated direct labor and travel costs for this report are \$543,000.

Action Required

In accordance with EPA Manual 2750, you are required to provide a written response to this report within 90 calendar days. Your response will be posted on the OIG's public website, along with our comments on your response. Your response should be provided in an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. If your response contains data that you do not want to be released to the public, you should identify the data for redaction. You should include a corrective actions plan for your actions, including milestone dates. We have no objections to the further release of this report to the public. This report will be available at <http://www.epa.gov/oig>.

If you or your staff have any questions regarding this report, please contact Wade Najjum, Assistant Inspector General for Program Evaluation, at (202) 566-0832 or najjum.wade@epa.gov; or Eric Lewis, Director, Special Reviews, Office of Program Evaluation, at (202) 566-2664 or lewis.eric@epa.gov.

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Chapter 1

Introduction

Purpose

In August 2010, congressional requestors asked the U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), to investigate EPA's efforts to communicate the risks of asbestos exposure in Libby, Montana. In response, the OIG agreed to evaluate how EPA communicates information to the public at the Libby Asbestos Superfund Site.

Background

Site History

The Libby Asbestos Superfund Site includes portions of the towns of Libby and Troy, and an inactive vermiculite mine. The mine is 7 miles northeast of the town of Libby. About 12,000 people live within a 10-mile radius of the town of Libby. Vermiculite had been mined at the site since the 1920s. The vermiculite from the mine was contaminated with asbestos. Asbestos is a human carcinogen that causes mesothelioma and lung cancer. The mine closed in 1990, but may have produced up to 80 percent of the world's vermiculite. EPA started cleanup activities in 2000. In 2002, the area was listed as a Superfund site. Since 2007, EPA has conducted activity-based sampling as part of its overall site evaluation. The sampling measures personal exposure levels by simulating daily activities. EPA declared the site a public health emergency on June 17, 2009.

The site is divided into eight cleanup areas, or operable units (OUs). Appendix A lists all eight OUs. OU1 and OU4 have been the focus of many community concerns identified in our evaluation. OU1 includes the former export plant and Riverside Park. EPA removed contaminated soil and issued a remedy in May 2010 for OU1. OU1 will be referred to as the export plant in this report. As of the end of the 2010 construction season, EPA has conducted cleanups for parts of OU4, including 1,460 businesses and homes.

Superfund Communication Strategies

Code of Federal Regulations Chapter 40, Part 300.430, requires EPA to prepare a community relations plan. This plan is also referred to as the community involvement plan (CIP). The EPA *Superfund Community Involvement Handbook* presents legal and policy requirements for community involvement. The *Handbook* identifies the CIP as the comprehensive strategy for all community involvement and outreach at a site. It specifies activities to address community

concerns and expectations. Region 8's guide for outreach activities at Libby is the community engagement plan (CEP).

The *Superfund Community Involvement Toolkit* suggests developing one overall communication strategy and many message specific strategies to meet the communication needs of a site. These needs are outlined in the CIP. The *Toolkit* suggests incorporating the overall communication strategy as part of the CIP. The *Toolkit* also recommends elements to plan for communication. These elements include identifying goals, key messages, audiences, concerns, activities, and timelines. It also includes setting measures for success and feedback mechanisms. These elements are described in appendix B.

Noteworthy Achievements

Region 8 communication efforts at the site exceed minimum community involvement requirements. Region 8 has selected spokespersons, conducted community interviews, prepared a CEP, and established an information repository. Region 8 communicates with the public by providing information in fact sheets, mailings, newspapers, public meetings, and letters. For example, site team members travel to Libby monthly to meet with community groups.

Region 8 also makes information available to the public on its website. Since the start of our review in November 2010, EPA has updated the Libby website and expanded the Frequently Asked Questions (FAQs) section. In January 2011, the OIG found over 280 documents on the EPA Libby website.

In 1999, Region 8 established an information center in downtown Libby. The center is a community resource that provides information about EPA's work. We identified approximately 30 handouts on display at the center. Additional documents were available in binders and on shelves. Region 8 also has a database of resident inquiries. Since 2005, a project manager has been located at the information center.

Region 8 also provides support through its environmental resource specialist (ERS) located in Libby. The ERS assists residents with questions about vermiculite and asbestos. The ERS has responded to over 475 phone calls since 2007.

Figure 1: Libby webpage index

Region 8 Libby pages
<ul style="list-style-type: none">• Libby Home Page• Major Milestones• Site Documents• Community Involvement• Frequent Questions• Risk Assessment• Cleanup Activities• Overview of Asbestos• Asbestos in Your Home• Asbestos Health Risks• Sampling and Analysis• Public Health Emergency• Contacts

Source: EPA Region 8 Libby Asbestos website, <http://www.epa.gov/libby/>, January 2011.

Scope and Methodology

We conducted this evaluation from November 2010 to June 2011 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the review to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our objective.

We reviewed EPA policies and guidance to identify the requirements for community involvement and communications. We also reviewed Region 8's CEP described by the site team as the guide for conducting outreach activities at the site.

We analyzed minutes and recordings from public meetings. These meetings included those of the community advisory group, technical advisory group, board of county commissioners, and city council. We also reviewed information center database entries from the Libby Hotline and the ERS call log.

We interviewed staff from the EPA Office of Solid Waste and Emergency Response and the Region 8 Superfund Remedial Response Program. We also reviewed the information on EPA's Libby website and at the Libby information center. The scope of our evaluation includes Region 8 communication and activities from 2007 to 2010.

Chapter 2

Overall Communication Strategy Needed for the Libby Asbestos Superfund Site

Region 8 does not have an overall communication strategy to plan, coordinate, and evaluate communication efforts at the Libby Asbestos Superfund Site. Despite extensive communication efforts, Region 8 has not fully satisfied community concerns about health risks or effectively communicated the limits of its risk assessment. Residents also have recurring questions about recontamination, the export plant, and activity sampling, even though Region 8 has provided information on those subjects. We also found that many public documents may be difficult for Libby residents to understand. These documents are often written for a highly educated audience. While not required, an overall communication strategy can help Region 8 evaluate and improve its communication activities. Region 8's CEP could serve as the overall communication strategy with the addition of guidance-recommended key elements. These include key messages, timelines, measures of success and feedback mechanisms.

Libby Residents Concerned About Health Risks and Site Activities

Region 8's communication efforts may never fully address the community's main concern. Community members consistently ask, "Is the Libby site safe?" Region 8 has performed considerable risk communication over the last 2 years. This includes explaining risk assessments and their limitations on its website. However, Region 8 staff noted that many Libby residents still expect that EPA's pending risk assessment will provide answers on safety. Risk assessments are not designed to definitively determine whether a site is safe. Instead, they identify levels at which the risk posed to human health is low enough to warrant no further cleanup action. Region 8 maintains that it addresses the uncertainty of not having a risk assessment through cleanup efforts. EPA's goal is to eliminate exposure pathways to reduce exposure risk, and therefore, health risks. Completion of the risk assessment has been postponed from September 2010 to September 2012. Until then, Region 8 could use residents' questions and feedback to plan communications that address health and safety concerns and risk assessment limitations.

In the interim, Libby residents want more information on ongoing and planned activities. Residents' questions include whether activity sampling results suggest that Libby schools are safe, and what steps residents can take to reduce exposure risk. Table 1 provides a detailed list of issues we identified as being raised in public meetings and through EPA databases from 2007 to 2010. Recurring concerns may show that Region 8 needs to address them more clearly.

Table 1: Libby Resident Concerns Identified by OIG, 2007–2010

Risk communication
<ul style="list-style-type: none"> • Long-term safety of living in Libby and the safety of residents' homes • EPA's methodology for developing cleanup criteria • Status and preliminary findings for the ongoing toxicity study and risk assessment • Precautionary measures to reduce exposure
Recontamination
<ul style="list-style-type: none"> • Exposure to asbestos during cleanup and from asbestos left in place after cleanup • EPA procedures and enforcement efforts to address and prevent asbestos recontamination
Export plant
<ul style="list-style-type: none"> • Rationale for making cleanup decisions prior to completion of a risk assessment • Opportunities for future community involvement in cleanup decisions • Asbestos exposure risk and risk notification • Responsibility for day-to-day site maintenance activities
Activity sampling
<ul style="list-style-type: none"> • Updates for all ongoing and planned activity sampling activities • Results and interpretation of all past activity sampling activities, including their limitations

Source: Minutes and recordings of public, community advisory group, technical advisory group, board of county commissioners, and city council meetings; and information center database entries, including Hotline and ERS call logs.

Readability Levels of Outreach Products Limit Communication

Material in the FAQs section of the Region 8 Libby website is written for a highly educated audience. Some portions of the FAQs for the Libby site are written at a graduate-school level. On average, the FAQs are written at a 15th-grade level. This equates to high school plus 3 years of college. We calculated the level of Region 8 responses to its FAQs with the Flesch-Kincaid Grade Level Readability Formula. This formula uses the average number of words per sentence and the average number of syllables per word. For example, this report is written at a 12th-grade level. EPA recommends that documents be written for a broad public audience and suggests that they be written at an eighth-grade level. Table 2 details the reading grade levels of each FAQs section. Material written at these levels may be difficult for the general public to understand.

Table 2: FAQ section reading grade levels

FAQs section title	Flesch-Kincaid reading grade level
General Interest	14
Action Levels and Removal Clearance Criteria	15
Activity-Based Sampling	15
Asbestos Ambient Air Issues	17
Background Levels	11
Communication and Public Involvement	17
Former Export and Screening Plants	14
Grace Settlement Funds	13
Kootenai Business Park	15
Progress of Cleanup	17
Public Health Emergency	14
Public Health Risks	18
Records of Decision	15
Residential Cleanups	13
Risk Assessment	15
Schools	15
Temporary Relocation of Property Owners in Libby	18
Worker Concerns	17
Average of All FAQs	15

Source: EPA OIG analysis of Flesch-Kincaid readability level for all FAQ responses found on Region 8's Libby website as of January 2011.

CEP Could Serve as Communication Strategy With Addition of Key Elements

Region 8 does not have an overall communication strategy to guide, coordinate, or assess communication efforts. Region 8's CEP could serve as the overall communication strategy with the addition of key elements. These elements include key messages, general timelines, measures of success, and feedback mechanisms. Although not required, an overall communication strategy could guide Region 8's efforts to better determine and address information needs in the community.

Identifying Key Messages Could Improve Information Consistency

Region 8 does not communicate consistent key messages to Libby residents. We found variations in what Region 8 staff stated to be key messages. During interviews, Region 8 staff also noted that inconsistent messages have made communication of certain topics challenging. One example is health and exposure risks. Also, information center staff did not have set materials to provide to new

residents for a variety of general questions. Center staff limited their recommendations to readily available handouts. Interviews show that the information center staff is the community's primary information source. However, the information center maintains only a subset of Region 8's outreach products in hard copy. Outreach products at the information center, and in general, should reflect key messages and be accessible to residents. Overarching key messages ensure that Region 8 staff delivers consistent and helpful messages to Libby residents.

Timelines Could Help Libby Residents Know When EPA Will Provide Information

Region 8 can increase its updates of events and publications through general timelines. Residents want to know when EPA will provide information. We found that many residents had questions about the status and timeline for the risk assessment and activity sampling results. Residents want predictable communication about events, the status of EPA's efforts, and future plans. EPA's *Toolkit* recommends establishing a timeline for community involvement activities that are linked to technical milestones or referenced seasonally or quarterly. Activities such as annual briefings and updates should be provided on a predictable basis. However, we found they often are not. Region 8 could create a forum where upcoming events and new information are constantly posted and updated.

Measures of Success Could Assist Region 8 in Evaluating Its Communication Efforts

Region 8 has not established measures of success to assess the effectiveness of its communication efforts. Measures may include tracking the number of people reached and changes resulting from activities. Region 8 has exerted much effort and many resources toward communication and plans to increase its efforts. Region 8 needs to ensure that its efforts are successful and the community understands its messages. Establishing measures could help Region 8 improve communications.

Mechanisms for Obtaining Public Concerns and Feedback Could Help Region 8 Meet Expectations and Information Needs

Region 8 has not incorporated formal feedback mechanisms to regularly identify public concerns. Region 8 formally collects resident feedback during mandatory updates of the Libby CEP and Superfund milestones. However, we found that Region 8 typically plans communications based on informal discussions with community members. EPA's *Toolkit* provides many mechanisms for obtaining public input. Some are listed in table 3. Site teams can use the *Toolkit* to evaluate and refine their work. Region 8 could collect and evaluate feedback through its website, public meetings, and the information center databases. Through these

mechanisms, Region 8 could better meet the expectations and information needs of the community.

Table 3: Examples of mechanisms for identifying concerns and gathering feedback

- Release a draft of the CEP for feedback from the community.
- When analyzing sampling results, announce results and initial interpretation, and solicit comments.
- Hold informal comment periods to accept feedback on proposed site activities, decisions, or issues.
- Ask people to fill out an evaluation card following meetings, presentations, or workshops.
- Use comment boxes for general feedback.
- Conduct a community satisfaction survey midway through cleanup.
- Use feedback questionnaires for input from community advisory groups, focus groups, and public meetings.
- Post a website survey that the public can access and fill out.

Source: EPA Superfund Community Involvement Toolkit.

Conclusion

An overall communication strategy can help EPA better plan and evaluate communication activities and products. In addition, Region 8 documents could be more useful if written for the general public. Region 8's CEP can serve as its overall communication strategy by developing feedback mechanisms and success measures to ensure that the public receives timely key messages.

Recommendations

We recommend that the EPA Regional Administrator, Region 8:

1. Ensure that Libby outreach products are readable for a general audience.
2. Revise the Libby CEP to serve as the overall communication strategy by including:
 - a. Key messages that address specific public concerns and site activities
 - b. Timelines for community involvement activities and outreach products
 - c. Measures for successful communication
 - d. Mechanisms for identifying community concerns and collecting feedback
3. Implement a process for ongoing evaluation of Region 8's communication strategy and incorporate results into community involvement planning.

EPA Region 8 Response to Draft Report and OIG Evaluation

The OIG reviewed and considered Region 8 comments. The report was revised where appropriate. Region 8's comments are in appendix C and the OIG's detailed evaluation is in appendix D. In its official response, Region 8 agreed with recommendations 1 and 3 but did not fully agree with recommendation 2. However, Region 8 agreed with all three recommendations after followup discussions. The region has committed to completing actions that will meet the intent of the recommendations.

Region 8 agreed with our first recommendation to revise the FAQs section of the website. It will also assess the readability level of future fact sheets to ensure that both are at or below a 12th grade reading level.

Region 8 initially disagreed with recommendations 2a and 2b. Region 8 stated that key messages and timelines are more appropriate for communication strategies and not CIPs. The CEP is Libby's CIP. Region 8, however, offered to provide an approximate timeline of activities for the upcoming year at annual meetings and through annual fact sheets. Because Region 8 does not have an overall communication strategy, Region 8 agreed in discussions to use the CEP as this strategy. It will include in the CEP the recommended elements from the report. Overarching key messages, such as for risk communication, will be developed by the site team and through resident interviews. General timelines informing the community of upcoming events will be available and routinely updated at the information center and on the Libby website.

In its official response for recommendation 2d, Region 8 indicated it will expand efforts to collect feedback and identify concerns. These include using tear offs on fact sheets, a comment link on the Libby website, suggestion boxes at information centers, and comment cards at community meetings and availability sessions. In addition, Region 8 agreed in discussions to adapt its current database system to uniformly store, track, and analyze residents' questions and feedback.

Region 8's official response concurred with recommendations 2c and 3. Region 8 will identify quantifiable measures of success and announce their results at annual update meetings and in fact sheets. In addition, Region 8 indicated in discussions that it will implement a survey tool to measure customer satisfaction. To further address recommendation 3, Region 8 will conduct a special round of interviews in 2012. These interviews will focus on community involvement effectiveness at the site. The results will be incorporated into the CEP. Public comments will also be solicited for the next major revision of the CEP.

In its final response to this report, Region 8 should provide a corrective action plan that includes brief descriptions of the actions that will be conducted to implement each recommendation, milestone or target dates, and the responsible offices.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Claimed Amount	Agreed-To Amount
1	8	Ensure that Libby outreach products are readable for a general audience.	O	Regional Administrator, Region 8			
2	8	Revise the Libby CEP to serve as the overall communication strategy by including: <ul style="list-style-type: none"> a. Key messages that address specific public concerns and site activities b. Timelines for community involvement activities and outreach products c. Measures for successful communication d. Mechanisms for identifying community concerns and collecting feedback 	O	Regional Administrator, Region 8			
3	8	Implement a process for ongoing evaluation of Region 8's communication strategy and incorporate results into community involvement planning.	O	Regional Administrator, Region 8			

¹ O = recommendation is open with agreed-to corrective actions pending
 C = recommendation is closed with all agreed-to actions completed
 U = recommendation is undecided with resolution efforts in progress

Description of Operable Units at the Libby Asbestos Superfund Site

Operable unit	Site description
1	The former export plant , situated north of downtown Libby, which includes the embankments of Highway 27, the former export plant, and Riverside Park.
2	The former screening plant , which includes areas impacted by contamination from the plant and also includes the Flyway property, a privately owned property, and the Rainy Creek Road Frontage and Highway 37 right-of-way.
3	The former vermiculite mine , which includes the surrounding geographic area impacted by releases from the mine, including Rainy Creek and the Kootenai River.
4	The City of Libby , which includes residential, commercial, industrial, and public properties, including schools and parks. OU4 includes only those properties not included in other OUs.
5	The Stimson Lumber Mill site , which includes all former properties that are now owned and managed by the Kootenai Business Park Industrial Authority.
6	The Burlington Northern Santa Fe Railroad yard and transportation corridors.
7	The Town of Troy , which includes all residential, commercial, and public properties, located approximately 20 miles west of downtown Libby.
8	U.S. and Montana state highways and secondary highways that lie within the boundaries of OU4 and OU7.

Communication Strategy Key Elements

The *Superfund Community Involvement Toolkit* identifies basic elements, key questions, and other guidance for site teams to consider when developing overarching communication strategies for Superfund sites. These basic elements and related key questions are summarized below.

Strategy elements	Examples of key questions
Goals	<ul style="list-style-type: none"> • What does EPA want to achieve with the communication? Is EPA providing information, increasing awareness, encouraging action, changing behavior, promoting community participation, or something else? • Are goals clear, simple, action-oriented statements about what EPA hopes to accomplish through outreach? • Do the other elements of the strategy relate to the goal(s)? Once you have established your goals, every other element of the strategy should relate to those goals.
Messages	<ul style="list-style-type: none"> • Are the messages identified? Focus on two to three key messages and rank them by importance, timeliness, or other factors.
Target audience	<ul style="list-style-type: none"> • Have all potential audiences been identified? • Once messages are identified, ask yourself: <i>Who is involved, affected, interested? What information do they already have? What information do they need?</i>
Public concerns	<ul style="list-style-type: none"> • Has the community involvement plan been prepared based on community interviews and other relevant information? • Is the plan issue-specific in that it identifies the community's issues, needs, and concerns?
Activities	<ul style="list-style-type: none"> • Are specific community involvement activities and outreach products identified? • Do activities and outreach products address public concerns? The community involvement plan should identify specific activities, outreach products, or programs that EPA will use to address the community's concerns.
Timelines	<ul style="list-style-type: none"> • Is there a timeline for activities throughout the pipeline (e.g., as the site team gets sampling results, we will hold a series of ground water workshops), or referenced by seasons (e.g., by spring 2002, we will hold a ...)?
Measures	<ul style="list-style-type: none"> • How will EPA know if its communication goals are met? • Are measures of success identified?
Feedback mechanisms	<ul style="list-style-type: none"> • Are there mechanisms for audiences to provide feedback? • Is EPA gathering and reviewing feedback after delivery? Feedback can be used to evaluate progress and identify concerns for planning information needs. • Based on audience feedback and measures for success, determine: What are the strategy strengths? Where can it be improved? How should your strategy be amended to ensure continued effectiveness?

EPA Region 8 Response to Draft Report

June 28, 2011

Ref: 8RA

MEMORANDUM

SUBJECT: Region 8's Response
OIG Draft Evaluation Report:
EPA Can Improve Its Communication Efforts at
Asbestos Superfund Site in Libby, Montana
Project No. OPE-FY11-0005

FROM: James B. Martin
Regional Administrator

TO: Wade T. Najjum
Assistant Inspector General for Program Evaluation

Attached is EPA Region 8's response to the Office of Inspector General's (OIG) Draft Evaluation Report Project No. OPE-FY11-0005, EPA Can Improve Its Communication Efforts at Asbestos Superfund Site in Libby, Montana. The response addresses factual issues, provides information on Region 8's community involvement program in Libby, Montana, indicates concurrence or nonconcurrence with each finding and proposed recommendation, and identifies alternative approaches to addressing some recommendations.

If you have any questions regarding this report, please contact me or your staff may contact Sonya Pennock, Supervisor, Public Affairs and Involvement/Office of Communications and Public Involvement, at 303-312-6600 or pennock.sonya@epa.gov.

Attachment

cc: Mathy Stanislaus, Assistant Administrator for Solid Waste and Emergency Response
Jim Woolford, Director, Office of Superfund Remediation and Technology Innovation
Paul Anastas, Assistant Administrator for Research and Development

Environmental Protection Agency, Region 8
Response to
Draft Evaluation Report – Office of Inspector General
EPA Can Improve Its Communication Efforts at Asbestos Superfund Site in Libby
Montana, June 2, 2011

At a Glance: Please revise to reflect any changes made in response to Region 8’s comments.

Because EPA’s community involvement program in Libby is so extensive, it may have been difficult for the Inspector General (IG) to determine the extent of our effort in that community. In addition to responding to recommendations, Region 8’s comments are designed to provide the IG with more information on community involvement and on Region 8’s community involvement efforts in Libby.

Chapter 1

Superfund Communication Strategies

p.1:“EPA’s communication strategy is called the community engagement plan (CEP).”

p.2: “These elements include identifying goals, key messages, audiences, concerns, activities and timelines. It also includes setting measures for success and feedback mechanisms.”

Response: Communication strategies are very different from community involvement plans. It appears that the IG cited the Superfund Community Involvement Toolkit tool for communication strategies (Tool #3), not community involvement plans (Tool #7).

- Distinction between communication strategy and community involvement plan.
 - Tool #3 – Communication strategies are a tool for planning EPA’s communications around a short-term, specific issue, event, action or problem. In 2010, EPA produced communication strategies for the release of activity-base sampling data in Libby schools, responding to difficult citizens, OU3 Slash Pile Burning, risk assessment communications and preparation for a CBS News interview. So far in 2011, Region 8 has drafted two communication strategies for Libby – Annual Update and Release of Draft Toxicity Values. Region 8 uses communication strategies as an internal communication planning tool.
 - CI Toolkit #7 – Community involvement plans are required by the National Contingency Plan. They are long-term plans that lay out a broad outline for communication and involvement over a period of years (up to 5 years). They are based on community interviews. The Libby community involvement plan was

titled “Community Engagement Plan” to reflect the preference of the Assistant Administrator of EPA’s Office of Solid Waste and Emergency Response for the term “community engagement” instead of “community involvement.” The Libby Community Engagement Plan was updated following the OU1 & 2 Records of Decision in 2010.

Noteworthy Achievements

Response: This section gives short shrift to the vast amount of community involvement and communication that has taken place at the site. Here are some examples:

- An EPA project manager is onsite in Libby and is available to Libby residents for responses to questions and concerns.
- Other Libby site team members travel to Libby monthly and meet with a vast array of community groups and individuals including the Lincoln County Commission, Libby City Council, Healthy Communities Initiative (A business and public sector group), Chamber of Commerce, Lincoln County Health Board, Libby Technical Assistance Grant recipients, and Community Advisory Group. We meet with other groups as the need and interest arise. We host periodic drop-in availability sessions where individuals can drop by and raise questions and concerns with staff. Since the beginning of 2011, we have hosted nine such availability sessions. We host at least one public meeting each year, frequently more. The timing of more formal public meetings is dependent on when a topic is ripe: annual update meeting, proposed plans, release of sampling results, release of draft toxicity values, etc.
- We regularly produce fact sheets and other communication materials. For example, in 2010, EPA produced two proposed plans, the annual project update fact sheet, a fact sheet on activity-based sampling and a guide to homeowners prior to the onset of construction on their properties. So far in 2011, we have updated all of the six existing best practices fact sheets, and drafted the annual update fact sheet, a new best practice fact sheet for homeowners performing yard work, a fact sheet summarizing the Libby story, and a fact sheet describing the process for developing toxicity values.

Chapter 2 – Public Communications Can Be Improved at the Libby Asbestos Superfund Site.

Libby Residents Concerned About Health Risks and Site Activities

P.4: First paragraph, last sentence. “Until then, Region 8 should be clearer about what health and safety questions these results can and cannot address.”

Response: In the past two years, EPA has performed considerable risk communication in Libby. At our monthly meetings with community groups, much of our discussion hinges around risk-

related issues. We've talked with and met with the City Council and David Thompson Search and Rescue building tenants about risks associated with usage of the park and search and rescue facility. EPA has produced and distributed seven best practices fact sheets that guide Libby residents on ways to reduce potential exposures to Libby Amphibole asbestos as they perform certain activities. Over the years, EPA has discussed risk assessment in many settings with existing groups like Libby City Council, Technical Assistance Grant (TAG) recipient, Community Advisory Group (CAG) and at public meetings and availability sessions. In early 2011, EPA conducted a series of 21 workshops in Libby on the risk assessment process. The presentation at these sessions clearly explained what a risk assessment does and what it does not do. We also have posted Q & As on the web page with this information.

The fact that there are no Libby Amphibole asbestos-specific toxicity values has complicated our ability to make definitive assessments of site risks.

In May 2011, EPA released the draft toxicity values for Libby Amphibole asbestos. This was a precedent-setting action. It is not EPA policy to provide information to the public about draft Integrated Risk Information System (IRIS) toxicity values that are still undergoing review within EPA and intergovernmental review. The Agency waits until the formal public comment process. However, given the impact that the draft toxicity values will have on EPA's assessment of the risks and subsequent cleanup decisions, the Agency felt it was appropriate to provide the draft IRIS toxicity information before it went to intergovernmental review. The week of May 3, 2011, headquarters and Region 8 staff met with key stakeholders and groups, hosted a public meeting and held 2 availability sessions to discuss the draft values and initial information on how those values might impact site risks (A total of 18 meetings were held.). These meetings were followed by more meetings and availability sessions the week of May 10, 2011. At these meetings, citizens asked questions, shared opinions and made suggestions to EPA staff. At these meetings, we provided the public with special annotated copies of the PowerPoint presentation, the annual update fact sheet, a background fact sheet on EPA's involvement in Libby and a fact sheet explaining what toxicity values are, how the values are used in the risk assessment process, and what the IRIS review process for the draft toxicity values will be. Region 8 has since begun discussions with key stakeholders on the impact the draft values have on our ability to make cleanup decisions for OUs 5 and 8.

P4, last paragraph: "In the interim, Libby residents want more information on ongoing and planned activities. Residents' questions include whether activity sampling results suggest that Libby schools are safe and what steps residents can take to reduce exposure risk."

Response:

At the 2010 annual update public meeting EPA presented the sample results from Libby schools to the community and explained their significance. EPA also met with the Libby School District to explain the results. At the May 2011 public meeting on the draft toxicity values, EPA

specifically showed how those draft toxicity values, coupled with exposure data impacted our understanding of risks at the Libby schools. We also are placing this information in the FAQ section of the Libby web page. EPA has produced and distributed seven best practice fact sheets that guide residents on how to reduce exposures as they perform certain activities.

P. 5 Table 1 Recurring Communication Issues

Response:

Please clarify if the IG is suggesting that the matters are not resolved for lack of an effort at communication. EPA has exerted considerable effort to address the concerns identified in this table and will continue to do so. In some cases, EPA does not yet have enough information to fully address the issue. In other cases, some citizens disagree with EPA's response. Below is a summary of our efforts:

- Risk Communication:
 - EPA has discussed risks and its approach to risk reduction throughout the process.
 - So far in 2011, EPA has conducted a series of 21 risk assessment workshops and has released draft toxicity values for Libby Amphibole asbestos.
 - As the IG pointed out, EPA doesn't use the term "safe." Our goal is reduce risk from exposure to target levels. EPA staff have explained this distinction in fact sheets, decision documents, web site Q & As, and at meetings.
 - Until the IRIS process for identifying toxicity values for Libby Amphibole asbestos is completed, EPA cannot produce a final risk assessment.
 - In the meantime, EPA is using existing toxicity information for asbestos to guide our cleanup criteria for interim response actions. During our monthly meetings we keep citizens apprised of the status of response activity and study progress.
 - EPA was not in a position to discuss the toxicity values specific to Libby Amphibole asbestos until the information had been reviewed within EPA. That review was completed at the end of April 2011.
 - In May 2011 EPA released the draft toxicity values that are undergoing IRIS review. At that time EPA conducted extensive public outreach. The process used is discussed above.
 - EPA has developed a series of seven best practice fact sheets that provide information on precautions that residents can take to reduce exposures. These fact sheets are distributed at public meetings, available in the Libby and Troy information centers and posted on the web page. EPA will continue to develop

best practices fact sheets when sampling identifies an activity that might increase exposure to Libby Amphibole asbestos.

- Recontamination

- During response actions considerable effort is made to ensure that dust from construction is not spread. The soil is watered down prior to the onset of work and kept wet during the response action. The requirement is that no dust be visible during the response action. In addition, EPA monitors the air to confirm that dust suppression efforts are successful. Trucks transporting contaminated material must follow an extensive protocol laid out in the Remedial Action Work Plan (RAWP) for making sure that the contaminated material is not released on roads.
- EPA's Environmental Resource Specialist has worked with the city and local construction firms to help them use similar controls when they are disturbing soil in the community. EPA has discussed its protocols with the city, the county, the Technical Assistance Grant recipient, the Community Advisory Group, and with private citizens. EPA also has included the information on the site web page, in the annual update fact sheet and in all the best practices fact sheets.
- The potential for recontamination is a continuing concern for EPA. This year, in response to community feedback, EPA revised its removal action approach in order to reduce the potential for recontamination by addressing alleys adjoining properties undergoing response actions, removing all shrubs and trees in contaminated soil and starting to conduct residential response actions on a neighborhood-by neighborhood basis. This revised approach was discussed at the public meetings that were held in May, in small group meetings with property owners and explained in the update fact sheet.
- EPA will undertake activity-based sampling efforts this year and in 2012 designed to better understand the potential for recontamination.
- In addition, preventing long-term recontamination will be the focus of institutional controls. For the past few years EPA has convened a work group that includes local government and private citizens that will help develop long-term operations and maintenance protocols for the site. In 2011, EPA began discussing institutional controls at public meetings and held a public Q & A session on the topic. EPA will continue to seek input from the community as we begin to flesh out options for long-term institutional controls.

- Export Plant
 - Prior to and during the 60-day public comment period for the OU1 proposed plan there was extensive discussion with local officials, community groups and at the public comment meeting about EPA’s decision to produce a Record of Decision (ROD). Some elected officials and community members expressed their opposition to producing a ROD prior to the availability of the final risk assessment. After considering public input, EPA documented its rationale for proceeding with the ROD in that document, in the response to comments attached to the ROD and on the web page. In response to public comments, EPA included a provision in the ROD that, following the construction of the remedy, the Region will conduct activity-based sampling and, using the Libby Amphibole asbestos-specific draft toxicity values, update our assessment of risks to be sure that the remediation is protective.
 - EPA continues to meet at least monthly with the city in a public forum to discuss the cleanup of OU1. We have provided risk information to the city and have marked areas at the park that should not be disturbed. The property is owned by the city. The city has a responsibility to notify those given permits for park use of the precautions that need to be taken. The remediation of the former export plant property is scheduled for the 2011 construction season.
- Activity-based sampling
 - In 2010, EPA developed and distributed flyers and published a public notice on activity-based sampling (ABS) explaining why we were doing it and describing what people were likely to observe. EPA also has explained the ABS results as they relate to specific areas with the appropriate stakeholders such as the school board. ABS information and sample results are posted on the Libby web page.
 - At the May 2011 public meeting, EPA described its activity-based sampling plans for 2011.
 - Information and questions about ABS are included on the site web page.

Readability Levels of Outreach Products Limit Communication

Response:

Because of the technical nature of some of the subject matter, EPA continually struggles with the difficulties of making its information understandable to citizens. There is an ongoing “pull and tug” between the need to be accurate and the need to be easy to understand. In addition, there are some residents in Libby who have accused EPA of “dumbing down” its informational materials. Others have requested that we strive to make our materials easier to understand. A random

analysis of fact sheets produced in the past two years indicates that fact sheet reading levels range from Grades 9.9 to 13.8. We strive to reach a 12th grade reading level or below. We agree that we should have paid closer attention to the reading level of the FAQs and will review and revise either by rewriting or adding a simplified summary at the beginning of the question.

Addition of Key Elements Could Strengthen Region 8's Communication Strategy

Response:

It appears that the IG is applying the communication strategy guidelines to the community involvement plan. As explained in an earlier response, they are different documents that serve different purposes.

- Identifying Key Messages Could Assist Region 8 staff.
 - Because the community involvement plan is a long-range (up to 5 years) communication plan, it would be very difficult to include key messages that would remain relevant for that period. When EPA develops communication strategies for specific actions, issues, events, it does include key messages pertinent to that subject and incorporates these messages in its outreach associated with the specific action, issue or event.
- Timelines Could Help Libby Residents Know When EPA Will Provide Information
 - EPA meets monthly with various community groups including public meetings with the TAG and CAG. These meetings are held on the same day and time each month and are noticed in the newspaper.
 - We have found that trying to arbitrarily set time frames for formal public meetings (for example, quarterly meetings) is not an effective use of community or EPA staff time. If there is no new information to provide and discuss, people who come to the meeting feel that their time has not been well used. Instead, in consultation with elected officials and other key stakeholders, we plan formal public meetings when we have information that will be of interest to the community such as reporting sample results, annual pre-construction season meetings, and release of draft toxicity values. We also hold public meetings in response to community requests for information on a specific topic. For example, EPA recently hosted a public Q & A sessions focused on the bark piles on OU5 and future remedy operations and maintenance. EPA wants to host meetings at meaningful times. EPA provides several weeks' advance notice of public meetings.

- Measures of Success Could Assist Region 8 in Evaluating Its Communication Efforts
 - While we try to gauge success by seeking informal public feedback, we agree that trying to more systematically measure community involvement is desirable.
 - One of the obstacles we face is that some of the tools generally used to evaluate effectiveness such as surveys, questionnaires and focus groups are, as a practical matter, not feasible due to the requirements of the Paperwork Reduction Act. It takes approximately 6-9 months to get an Information Collection Request approved by OMB.
 - The Community Involvement Impact Analysis Project referred to in Table 3 is no longer available and the questionnaire has expired.
- Mechanisms for Obtaining Public Concerns and Feedback Could Help Region 8 Meet Expectations and Information Needs.
 - As indicated above, there are obstacles to using some tools for seeking feedback.
 - Periodically, EPA has included “tear offs” in fact sheets seeking feedback on the understandability of the information, identifying other information people might want to have, etc. We have received feedback through this approach that has helped us identify future topics for fact sheets and areas where we need to improve our communications.
 - Periodically, EPA provides comment cards at public meetings seeking input on the understandability of the information presented and seeking input on other topics of interest and suggestions for improving the public meetings. The feedback received through this mechanism has helped EPA’s site team learn if meeting presentations have been clear and understandable and if the format worked for the community.
 - EPA regularly seeks informal suggestions for improving our public process from those individuals and groups with whom we meet and incorporates these suggestions into our program when feasible.

The goal of community involvement in the Superfund process is to make sure that interested citizens at Superfund sites have access to site-related information and an opportunity to participate in EPA’s process. Community involvement efforts cannot guarantee that citizens will agree with EPA’s actions, assure that EPA can do what citizens’ want, or provide answers to questions for which the necessary information is not yet available. Region 8 believes that the extensive community involvement process in Libby provides easy access to site-related information and many opportunities for interested citizens to participate in our remedial process.

Over the years, EPA has responded to input received from the public. For example, in response to concerns about the shrinking economic base of the community, EPA hosted two redevelopment workshops. When Stinger Welding was considering moving to Libby, EPA worked with the city and the company to make sure that contamination issues were resolved to expedite the move. In 2009, in response to long-standing community concerns about health care for those with asbestos related disease, EPA issued its first ever finding of a public health emergency under Superfund which paved the way for the Department of Health and Human Services to provide health care assistance. At the present time, in response to the city's desire to expand Riverside Park, EPA is working with the city to tailor the OU1 cleanup to facilitate redevelopment. EPA is also providing the city with funding for part of this work. Because residential property owners have been dissatisfied with the quality of replacement soil that is being used in residential response actions, this year EPA has brought in a soils expert to advise the agency on how to amend the replacement soil so that it provides a better growing medium.

Recommendations

1. Ensure that Libby outreach products are readable for a general audience.

Response:

- EPA concurs with this recommendation.
 - EPA will run the Flesch-Kincaid Grade Level Readability Formula on all future fact sheets in order to produce fact sheets at or below a 12th grade reading level.
 - EPA will revise the FAQ section of the of the web page and either rewrite Q & As that require more than a 12th Grade reading level or include a simple summary of the response at the beginning of the answer. The revision of the FAQ section will be completed by 12/31/11.
2. Revise the Libby CEP to include
 - a. Key messages that address specific public concerns and site activities
 - b. Timelines for community involvement activities and outreach products
 - c. Measures for successful communication
 - d. Mechanisms for identifying community concerns and collecting feedback

Response:

- EPA partially concurs with this recommendation.
- a) & b) are not appropriate for a community involvement plan. Key messages and timelines for activities are more appropriate for communication strategies. EPA's

communication strategies have and will continue to include key messages and timelines for the specific activity, issue or event.

- At the annual update meeting and through the annual update fact sheet, EPA will include an approximate timeline for site activities for the upcoming year and will identify those community involvement activities planned for the year and the approximate timing for the activities. The next annual update meeting and fact sheet will be in the spring of 2012.
 - c) EPA will identify quantifiable general measures of success. The measures will be discussed in the spring 2012 update meeting and placed in the December 31, 2012 addendum to the 2010 Community Engagement Plan.
 - d) Region 8 will use fact sheet tear offs in all fact sheets, distribute comment cards at all public meetings and availability sessions, add a comment link on EPA's Libby web page and place suggestion boxes in the Libby and Troy Information Centers as mechanisms for the public to identify concerns and provide feedback. The web page link and suggestion boxes will be in place by September 30, 2011.
3. Implement a process for ongoing evaluation of Region 8's communication strategy and incorporate results into community involvement planning.
- Region 8 concurs that the site team should engage in ongoing evaluation of the community involvement program.
 - In response to recommendations 2.c. and 3 Region 8 will identify quantifiable measures of success and announce them at the annual update meeting and in the update fact sheet in spring of 2012. Each year at the update meeting and in the update fact sheet, EPA will report on these measures.
 - Measuring community involvement effectiveness is inherently subjective. As we have explained in this response document, the limitations imposed by the Paperwork Reduction Act make evaluating community involvement, even subjectively, hard to accomplish. Given these limitations, Region 8 will endeavor to use the community interview process for community involvement plans, which is exempt from the requirements of the Paperwork Reduction Act, to periodically evaluate community involvement in Libby. In 2012, Region 8 will conduct a special round of interviews focused on the effectiveness of community involvement in Libby. The Region will report the results of these interviews in an addendum to the 2010 Community Engagement Plan along with an outline of actions the Region will take to address shortcomings identified in the interviews. The addendum will be published by December 31, 2012. Region 8 also will include evaluation questions in the interviews

that will be conducted for the next major update of the Community Engagement Plan. This update will take place following the next Record of Decision or in 2015 whichever comes first.

- Region 8 will solicit public comment on the next major revision of the Community Engagement Plan which should take place following the next Record of Decision or in 2015, whichever comes sooner.
- Region 8 will continue to seek informal feedback from the Libby community during monthly meetings.

Detailed OIG Evaluation of EPA Response

CIP vs Communication Strategy

Region 8's response states that communication strategies are very different from community involvement plans (CIPs). This response indicates that the Libby CEP is not the overall communication strategy for the site. We are aware of the difference between CIPs and communication strategies and were informed by Region 8 staff during our review that the Libby CEP serves as its overall communication strategy.

The *Superfund Community Involvement Handbook* states that "The CIP is the comprehensive strategy for all community involvement and outreach at the site. A communication strategy for each element of the overall CIP should guide the development and become part of the CIP" (p. 29).

Tool #3, *Communication Strategies*, further clarifies this by stating:

A communication strategy is a list of messages, audiences, potential message vehicles, resources required, and feedback mechanisms to meet the unique communication needs of a Superfund Site. These needs are outlined in the ***Community Involvement Plan*** prepared for each site. In these cases the Community Involvement Plan serves as a communication strategy for the site. Message-specific communication strategies contain the exact details of message content, audience, and delivery or the individual messages you will develop. You will develop one overall communication strategy and many message-specific strategies. (p.1)

From our interpretation, EPA's *Toolkit* advises site teams to develop one overall communication strategy as well as many message-specific communication strategies. In cases where there is not a separate strategy, the CIP can serve as the overall communication strategy. The Agency's response regarding Tool #3 references only message-specific communication strategies, which we do not include in our discussion of the CEP. We are aware that Region 8 has created numerous message-specific strategies, which we have reviewed. However, the focus of our report is the **overall** communication strategy for the site. Since Region 8 has provided clarification of the CEP's purpose, we have revised our report to reflect that Region 8 does not have an overall communication strategy. Our findings indicate that an overall communication strategy will be useful for communications planning at Libby. Region 8 can revise the CEP to serve as its overall communication strategy by including key elements. Our recommendations remain unaffected by this clarification.

Recommendation 2

Region 8's response states that key messages and timelines are not appropriate for CIPs. Region 8 states that these are more appropriate for message-specific communication strategies developed for specific actions, issues, and events. Recommendations 2a and 2b do not refer to key messages or timelines for one-time events, activities, or issues that might need a "message-

specific” communication strategy. We are referring to the analytical process used to identify the why, what, who, when, where, and how of relaying information for an **overall** communication strategy. Overall key messages help ensure message consistency and delivery for the entire Libby Superfund site.

Region 8’s response also states that because the CEP is a long-range plan, it would be very difficult to include key messages that would remain relevant. We do not expect these overarching messages to change frequently, but as the CEP is a living document, we do not believe that adjusting these messages periodically to reflect new information is unreasonable.

We are not requesting that Region 8 arbitrarily set time frames for formal public meetings. The *Toolkit* recommends establishing a timeline for community involvement activities that are linked to technical milestones, or referenced seasonally or quarterly. *Toolkit* examples include: “As the site team receives sampling results, we will hold a series of groundwater workshops,” or “EPA will hold meetings within two weeks of the start of field work to agree on a testing cycle.”

Recommendation 2b reflects our concern that notifying residents of meetings and events a couple of weeks in advance may not provide them with the broad roadmap they seem to want. In addition, while it is helpful that Region 8 meets monthly with the City Council, County Commissioners, CAG, TAG, and others, attendance at these meetings is limited. As a result, an easily-accessible forum that is updated with upcoming events and new or changing information may satisfy the community’s desire to be kept informed of Region 8’s activities.

EPA announced in the Federal Register on May 4, 2011, its plans to renew the OMB-approved Information Collection Request (OMB #2050-0096), expiring July 31, 2011. Upon renewal, Region 8 can also implement this survey as a tool for measuring customer satisfaction under Recommendation 2c.

For Recommendation 2d, in addition to tear offs, comment cards, suggestion boxes and Web links, Region 8 should consider how it plans to uniformly store, track, and analyze incoming information. Region 8 already has in place a database system that tracks resident questions and concerns that can be optimized to identify issues and run reports that further guide EPA’s efforts.

Region 8 Communication Efforts

Region 8’s response details numerous communication activities that were performed in 2011 to address our findings. As the scope of this evaluation is limited to 2010, we will not include these activities in our report. We encourage Region 8 to measure the effectiveness of these 2011 communication activities as well as systematically gather feedback to identify additional concerns and issues. This will assist Region 8 to ensure that communication efforts are meeting information needs and are presented clearly to the Libby residents.

In addition, table 1 lists the common questions asked by Libby residents during public meetings and events that we identified during our evaluation. They are provided in this report so that Region 8 might be aware of frequent topics of concern and seek ways, including those discussed in the report, to more effectively identify and address these information needs in the community.

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