

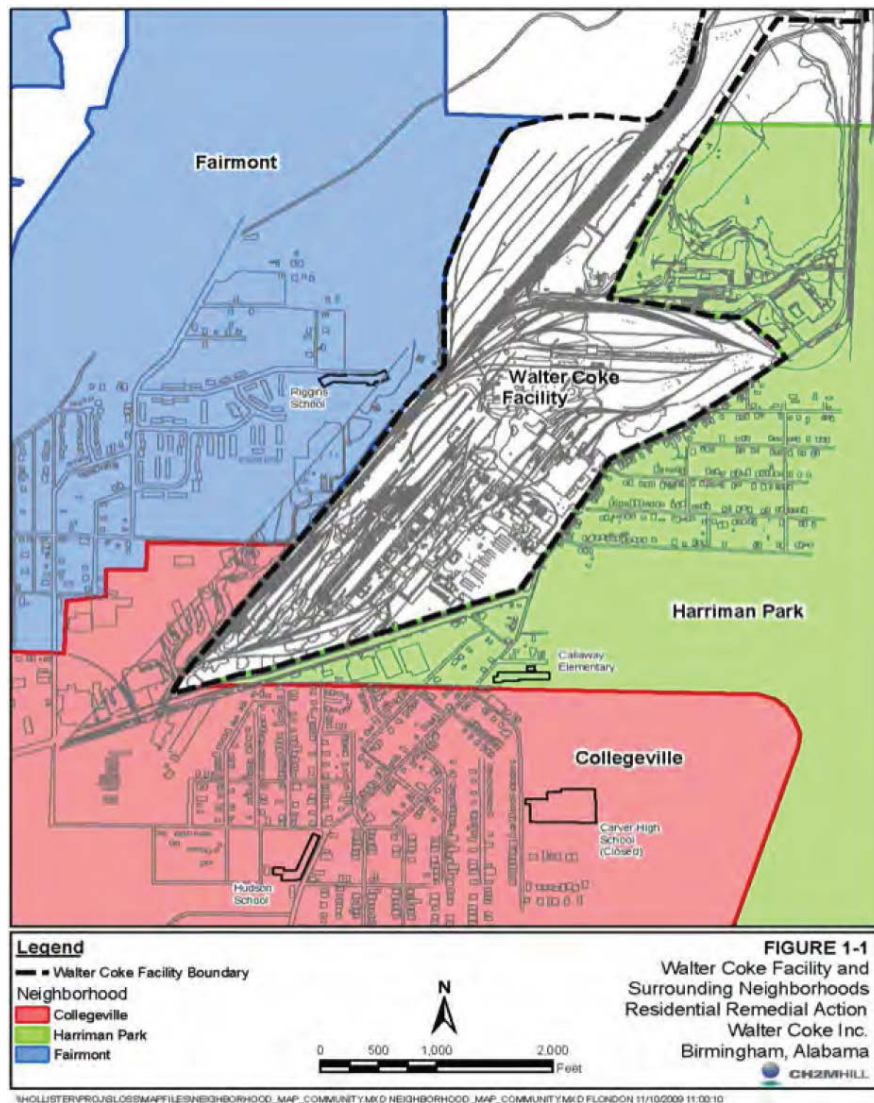
RCRA COMMUNITY ENGAGEMENT INITIATIVE (CEI) CASE STUDY

The following case study demonstrates beneficial CE principles and techniques. A common theme between each of the case studies is that EPA and the facilities worked together to coordinate a cohesive plan to keep the community informed and provide a forum for its participation.

Facility Name and Location: Walter Coke, Inc. (fka Sloss Industries), North Birmingham, AL

Background

Walter Coke, Inc. is a 90-year old facility that manufactures coke from raw coal for the blast furnace and steel industry. Located in North Birmingham Alabama, the facility is adjacent to three environmental justice (EJ) communities: the Harriman Park, Collegeville, and Fairmont neighborhoods.



Since 1989, the facility has been operating under an EPA-issued enforcement order [Administrative Order on Consent, 3008(h)] for RCRA Corrective Action. In 2009, EPA requested that the facility investigate neighboring properties for contaminants of concern in surface soils. Over 70 locations were sampled by the facility in 2009. Results showed levels above EPA short-term screening levels for arsenic and benzo(a) pyrene at nearby schools and residences above cleanup levels. Several CE activities were initiated in conjunction with the residential soil sampling and cleanup activities.



Below is the timeline of CE efforts at Walter Coke and descriptions of the CE activities. Detailed descriptions of the CE Tools are presented in the CE Tools section of this Guidebook.

Trigger Event	CE Tool	CE Activity Description
2009		
EPA RCRA conducted outside-the-fenceline investigations in 2005 and 2009 to follow the nature and extent of contamination from Walter Coke	Public Meetings	<ul style="list-style-type: none"> EPA RCRA corrective action technical staff did outreach during a Walter Coke sponsored “community barbeque” to announce the upcoming 2009 community soil sampling event for the 3 adjacent neighborhoods and promote signing of +70 property access agreements.
2010		
Local technical meeting to discuss 2009 community-based sampling results. Discussed adverse soil findings for local schools and residences.	Community Profile Partnering	<ul style="list-style-type: none"> Demographic EJ maps and a situational analysis were created to better understand the community. EJ GIS maps were ‘ground-truthed.’ Community reconnaissance was conducted of the school and residences found with high PAH levels. EPA provided a CE presentation at an EPA technical meeting held with the Agency for Toxic Substances and Disease Registry (ATSDR), the Alabama Department of Environmental Management (ADEM), and Walter Coke officials.
Technical findings released to School District	Fact Sheet Letters *	<ul style="list-style-type: none"> Communications with Birmingham School District Superintendent and officials began re: adverse soil findings. Conducted verbal and written notifications of 2009 soil sampling findings to School District and composed a parent and faculty Fact Sheet on findings.
Technical findings; sharing information with residents	Letters* Canvassing* FAQs * Fact Sheets Feedback Public Meetings Information/ Data Availability Sessions * GIS Maps *	<ul style="list-style-type: none"> EPA RCRA staff coordinated and released 2009 Community Soil Sampling Results Letters to +70 property owners/renters. Canvassed door-to-door and sent invitations for Information Sessions Held Community Leader Meeting and listening session for Collegeville, Fairmont, Harriman Park Neighborhoods. Included Walter Coke participation.
2011		
Pollution community complaints from residents, and facility recommendations to take a leadership role in CE	Consultations *	<ul style="list-style-type: none"> Consultations with Walter Coke Communication Director and public relations consultant to encourage direct communications with the impacted communities especially on air pollution issues (active Clean Air Act permit at facility). Challenged Walter Coke to start a community dialogue process, and provided the EPA Community Advisory Group guidance. As a result, the facility launched a monthly Community Advisory Panel (CAP) meeting process with assistance of a local PR consultant.

Key: * = CE Tool not covered in current CE Toolkit

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Community complaints about lack of technical assistance & unsecured contaminated areas	Grants * Consultations *	<ul style="list-style-type: none"> EPA coordinated Technical Assistance Services for Communities (TASC) involvement. CE staff created a proposal, technical directive and TASC guidance. CE and technical staff coordinated communications with City of Birmingham (Planning, Engineering and Permits Dept.) to secure the abandoned Carver High School Property fencing and add warning postings to reflect the property was contaminated.
Community pollution complaints continue	Feedback Public Meetings	<ul style="list-style-type: none"> Meetings and calls with Community Leaders and active citizenry to generate internal environmental justice concerns summaries. Air concerns were the majority of community complaints. Shared summaries with internal EPA Air and OEJ programs.
Need to share overall risk management strategy	Public Meetings Partnering	<ul style="list-style-type: none"> Special CE, technical and EPA Management meetings held with Community Leaders to outline RCRA next steps of soil cleanup/ replacement at locations above cleanup levels.
Growing need for internal EPA programs to collaborate; requested Air program to perform air model on Walter Coke sources (using AERMOD)	Partnering Consultation *	<ul style="list-style-type: none"> RCRA CE advocated a One-EPA approach between RCRA and Air Division, sharing serious citizen-based EJ air complaints/concerns and coordinated an internal meeting. Staff encouraged Air Division to take a stronger position on Walter Coke issues due to air pollution deposition-to- soils and health exposure concerns.
Facility-sponsored public meetings	Public Meetings Feedback	<ul style="list-style-type: none"> RCRA CE attendance at various monthly Walter Coke sponsored Community Advisory Panel (CAP) meetings. Community offered critical feedback to the facility, EPA, and other regulatory programs.
Risk Management: Two schools received soil cleanup and replacement	Flyers/Letters *	<ul style="list-style-type: none"> Composed Parent flyers re: risk management interventions at both Riggins and Hudson K-8 Schools. Collaborative effort of RCRA staff to facilitate outreach with the North Birmingham School District, ATSDR and Southeast Pediatric Environmental Health Specialty Unit (SE PEHSU).
Transparency in EPA actions	Information Repository	<ul style="list-style-type: none"> Launch of EPA RCRA CE outreach website for Walter Coke host community at FOIA Reading Room, https://www.epa.gov/foia/outreach-information-erp-compliant-coke-llc Maintained a limited library information repository at N. Birmingham Library since 2007.
Broadcast of Soil Sampling results	Public Meetings Feedback	<ul style="list-style-type: none"> Two RCRA staff (CE and technical) coordinated two EPA/ATSDR Community Forums, held to broadcast community soil sampling results, about 30% of properties and ¾ schools were above cleanup levels. About 300 attended; large news media coverage. Citizens expressed concerns. CE Tools included updated maps, Fact Sheets, FAQs. Mayor's office briefing also held.

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Community-capacity building	Technical Assistance* Workshops Feedback	<ul style="list-style-type: none"> CE staff helped direct work under Technical Assistance Services for Communities contractor (the "TASC" contract is with EPA HQ): <ol style="list-style-type: none"> Technical Assistance Needs Assessment (TANA) completed by interviewing ~5 residents (May 2011) Held Environmental Basics and Community Empowerment Workshop (July 2011) and Community Workbook (about 100 attended on Saturday) conducted by TASC and RCRA staff. Heard current citizen concerns.
Gathering Citizen Concerns	Feedback Listening Session *	<ul style="list-style-type: none"> EJ Listening Multi-Agency Session (US Attorney, DOJ, EPA senior management) held in B'ham with Regional Administrator in attendance. CE efforts were about assisting with invitations for N. B'ham representatives.
Risk Management: Residential Property cleanup	Canvassing*	<ul style="list-style-type: none"> CE and technical staff provided support with the Site Access Agreement process for the 23 targeted residential properties for soil cleanup to be conducted by Walter Coke. Sixteen homes agreed to have cleanup and soil replacement performed.
Growing need to address community capacity	Partnering Technical Assistance *	<ul style="list-style-type: none"> Awarded \$20,000 of special funding from Headquarters for technical assistance. The approved collaborative project is called, "Assessing and Addressing Environmental Justice ("EJ") and Children's Health ("CH") Living near Industry in North Birmingham, AL." CE staff also helped compose (with other programs) a successful HQ proposal for TRI and pollution prevention special project funding to assist this EJ impacted community.
2012		
Coordinated approach recognized by EPA Senior Management	Partnering	<ul style="list-style-type: none"> RCRA, Air, Superfund, Water, and Office of Environmental Accountability (OEA) Division discussions began as to how to take a stronger comprehensive "One-EPA" approach to our EPA mission there. Superfund announced their involvement in the "outside-the-fenceline" contamination issues in the community, with Walter Coke as 'ground zero;' Superfund Removal Program Administrative Order on Consent (AOC) negotiations were initiated.
The RCRA Corrective Action Section continues to negotiate a new "Round #2" AOC talks with Walter Coke to address mostly "inside-the-fenceline" cleanup issues	Public Participation Plans	<ul style="list-style-type: none"> RCRA agreed for need for the AOC to contain a condition that the facility is to construct a meaningful Community Involvement Plan for EPA approval.
One-EPA effort moving forward	Communications Strategy	<ul style="list-style-type: none"> The North Birmingham Environmental Collaboration Project developed an internal Outreach/Communications Strategy.

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