

Information Repository

Overview

An information repository is a collection of documents pertaining to the Superfund site, including correspondence, reports, and documents that are publicly available to the community, as well as general Superfund program information. Information repositories are used by the community to research the site and the law pertaining to the cleanup and learn how to participate in the cleanup process.

Why This Is Important

Information repositories are important because they provide the public with easier access to site-related documents, and because the National Contingency Plan (NCP) requires EPA to establish an information repository at each Superfund site. The NCP in 40 CFR §300.415(n)(3)(iii) states that the lead agency is required to "establish at least one local information repository at or near the location of the response action."

The information repository contains the administrative record and other documents, and these items are available for inspection and copying. The following items are required to be in an information repository for remedial responses. Required items for removal actions will vary; refer to the *Community Involvement Handbook* for more detailed information.

- Administrative Record.
- <u>Technical Assistance Grant</u> application and related information.
- The proposed plan, and any materials pertaining to the plan such as a transcript from the <u>public</u> <u>meeting</u> held during the public comment period.
- Record of Decision (ROD) and other ROD-related items such as the Explanation of Significant Differences, and the amended ROD.
- National Priorities List deletion information.
- Five-Year Review report and summary.

Implementation

When to Establish an Information Repository

The information repository should be established early in the response action. At least one repository

This and all tools in the Community Involvement Toolkit should be used in conjunction with the *Community Involvement Handbook*, which provides guidance to EPA staff on how EPA typically plans and implements community involvement activities at Superfund sites.

should be established at a response location. The timeframe for establishing an information repository depends on the length and type of action:

- Remedial sites: Before the remedial investigation/ feasibility study begins.
- Removal actions expected to exceed 120 days:
 Within the first 120 days.
- Removal actions with a planning period of at least six months: Within the first 120 days, and no later than the date that the engineering evaluation/ cost analysis approval memorandum is signed.

The Agency should inform the public when the information repository is established. The availability of the Administrative Record is announced through the publication of a *public notice* in a local newspaper of general circulation. Community involvement coordinators (CICs) should ensure that all materials are in the repository before the public is notified.

How to Determine the Information Repository Location

The Agency is required to establish at least one information repository at each Superfund site, at a physical location that is easily accessible to the public. In addition to at least one physical information repository, EPA also can establish an "electronic information repository" that makes documents available to the public via the internet. (See box on page 2.)

The location and address of all repositories should be listed on the site's EPA site profile page. Detailed instructions for the public about how to access an online information repository also should be provided at the local information repository. Consider putting the web address for electronic access to site documents in the public notice along with the physical location and hours of the local information repository.



Some common locations for an information repository are public libraries, city halls, and public health offices where public access is convenient and photocopying equipment is available. Sometimes information repositories are located in alternative locations, including fire stations or religious buildings. The repository should be accessible during normal business hours. The facility must meet the requirements of the Americans with Disabilities Act. Some sites have more than one information repository. The number of repositories established usually depends on the distance between the site and the affected communities. Specific locations for information repositories often are determined via *community interviews*.

How to Organize an Information Repository

The CIC makes arrangements for the location of the information repository by contacting the likely facility and negotiating with the facility's point of contact. If a copy machine is not available, it is possible to purchase one with site funds. Repository contents should be organized, indexed and situated in a spacious area. It is advised that the CIC plan the arrangement of the documents in advance. Multiple copies of items should be made to compensate for misplaced documents. Repository contents should be updated regularly with recent information.

The contractor or CIC is usually in charge of adding documents to the repository. The repository should be maintained by a custodian in coordination with the CIC. Pertinent materials are typically mailed to the repository location with instructions on indexing and placement. Documents relating to the Administrative Record are sent to the information repository by a Regional Records Department. The repository custodian should create and revise an index when each new document is added to the repository. The CIC should notify the custodian of the repository of these responsibilities when soliciting the facility's cooperation.

The CIC is responsible for visiting the repository regularly to ensure that all necessary materials are easily accessible and that documents in the repository clearly indicate how individuals can comment on them. One method is to place a cover note on documents indicating who is to receive comments and by when. Moreover, the CIC must publicize the repository's location and hours of operation by notifying local government officials, citizen groups, and the *media*. The CIC also may inform the public by printing articles in community and church newsletters or posting notices online.

Electronic Information Repository

On March 18, 2013, 40 CFR §300.805(c) was amended to allow the Agency to make the administrative record and other necessary files for the information repository available electronically. Each Superfund site also must establish at least one information repository at a physical location.

Electronic information repositories include:

- CD-ROMs housed at a physical information repository.
- An online repository where documents are available to the public on the site's EPA site profile page.
- Electronic files accessible via the Superfund Enterprise Management System Publishing (SEMS-Pub) application.

CICs should work with their Regional Records Manager to identify and upload materials to the documents section of the site's profile page. Regional Records Managers should follow standard operating procedures to prepare documents for public electronic availability.

For more information about establishing an electronic information repository, see Attachment 1 of the November 14, 2016 memorandum, <u>Update to 2010 "Revised Guidance on Compiling Administrative Records for CERCLA Response Actions" and Questions and Answers Regarding Implementation of the NCP; Revision to Increase Public Availability of the Administrative Record File Final Rule.</u>