

Paden City Groundwater Superfund Site COMMUNITY INVOLVEMENT PLAN



2023 March

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INTRODUCTION

The goal of this Community Involvement Plan (CIP) is to encourage and facilitate community engagement throughout the Paden City Groundwater Superfund Site (Site) cleanup. The CIP describes how the U.S. Environmental Protection Agency (EPA) will involve the community and address local needs during the Superfund process. EPA and the community will work together by using the tools described in this plan. Active public involvement is crucial to the success of any project. EPA's community involvement activities at the Site are designed to inform the public of all cleanup activities and include the community in the decision-making process.

EPA defines the "community" as those people and entities who have an interest in or are affected by the Site. EPA also recognizes that other stakeholders, including local, state and federal agencies, may have an interest in the Site. This CIP integrates feedback received from Situation Assessment interviews conducted by an EPA contractor in June 2022, community interviews conducted in July 2022, and a Superfund Workshop held with the community in September 2022. The CIP is a "living document," meaning that it can be updated or revised over the course of Site cleanup to reflect long-term changes in the community.

Community Involvement at the Paden City Groundwater Superfund Site

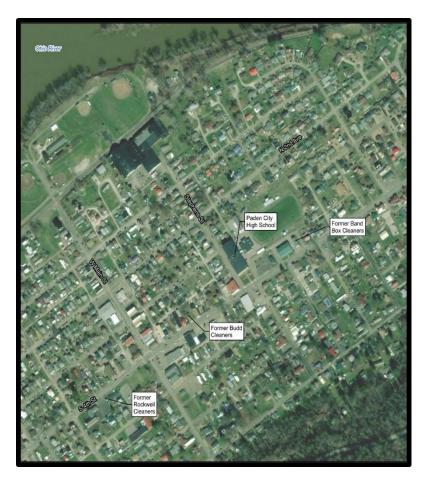
Active and participatory community involvement is an important part of the cleanup process. It is also regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as "Superfund." This CIP follows community involvement requirements in the Superfund Amendment and Reauthorization Act of 1986 (SARA) §117 and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) §300.430. EPA's Community Involvement Program is designed to facilitate participation of community members throughout the cleanup process, including the investigation phase and the remedy selection phase. EPA works closely with state and local agencies to provide community involvement throughout the Superfund process.

THE COMMUNITY

Site Overview

The Paden City Groundwater Site is in a mixed-use area consisting of residential homes and commercial buildings located in Paden City in northern West Virginia along the Ohio River. The Site consists of soil and groundwater contaminated with the solvent tetrachloroethylene (PCE) and its breakdown products. PCE is commonly used in commercial and industrial operations such as dry cleaning. Contamination at the Site is attributed to historical operations at the former Band Box Dry Cleaning Facility.

The town of Paden City obtains drinking water from public water supply wells which were found to be impacted with PCE. One additional industrial well has also been impacted. Paden City's air stripper water treatment system, which removes contamination from the drinking water, went online in May 2020. The treated water currently meets State and Federal regulatory standards. The Site was proposed to the Superfund program's National Priorities List (NPL) in September 2021 and



added to the NPL in March 2022. For more information and current status of the Site, please visit the Paden City Groundwater Site Profile Page at www.epa.gov/superfund/padencitygroundwater.

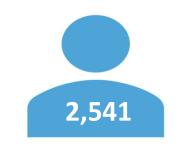
About the Community

Paden City is a small city located along the Ohio River in Wetzel and Tyler Counties in the State of West Virginia. It was founded in 1902. The city has a total area of 0.85 square miles according to the United States Census Bureau. The population of Paden City is 2,541 people in 2022 according to figures from the Census Bureau.

In general, community interest in the Paden City Groundwater Superfund Site is mixed. Some individuals express considerable concern regarding the health impacts from exposure to PCE and the high incidence of illness in the community. Other community members feel indifferent towards the Paden City Groundwater Superfund Site and note that contamination is common in many areas around town due to the industrial

history of Paden City. Since the NPL listing, community interest and understanding of the Site appears to be increasing. EPA believes community interest and concern will continue as progress is made in cleaning up the Site.

This CIP was prepared to help meet the needs of the Paden City community and those impacted by EPA's decision-making process. EPA conducts community involvement activities to provide the local public with opportunities to participate in the decision-making process about Superfund actions and to keep the public well informed about the progress of those actions.



Population of Paden City, West Virginia according to the 2022 Census Bureau.

Site Listing to the National Priorities List and Next Steps

In 2018, the West Virginia Department of Environmental Protection (WVDEP) requested EPA's assistance to help determine the source of the contaminated groundwater in Paden City after the City's water authority reported contaminants in the untreated water. A Non-Time-Critical Preliminary Removal Assessment was conducted by EPA's Removal Program to determine if hazardous substances were present at the Site, if the Site poses a threat to human health and the environment, and to support a Site decision regarding the need for further Superfund action.

Sampling was conducted at the Site in November-December 2018. During the Preliminary Removal Assessment, three former dry cleaners were found to be possible sources of the contamination. Based on the results, EPA conducted additional sampling in April 2020. Subsurface soil contamination was identified at the former Band Box Dry Cleaning Facility. No PCE contamination was determined to be associated with the two other dry cleaners. The Removal Assessment concluded that the former Band Box Cleaners is the likely source of the PCE contamination in Paden City's groundwater. The Removal Assessment also concluded that no removal action was needed at the time because it was determined that the concentrations in soil, air, vapor, and groundwater did not rise to the level of risk indicating an imminent and substantial threat. In addition, it was determined that the site would be best addressed under a future remedial action.

Following the Removal Program's determination, EPA's Site Assessment Program conducted a Site Inspection (SI) in June 2020 and November 2020. The SI concluded that the Site would require long-term cleanup. In concurrence with the State of West Virginia, EPA proposed the Site to the NPL in September 2021. The Site was formally listed on the NPL in March 2022. EPA is currently working on the Remedial Investigation (RI) for the Site through the Superfund Remedial Program.



For information about EPA's Superfund Remedial Process, please see the Appendix C titled "Superfund Remedial Process."

For information about EPA's Superfund Removal Process, please see the Appendix D titled "Superfund Removal Process."

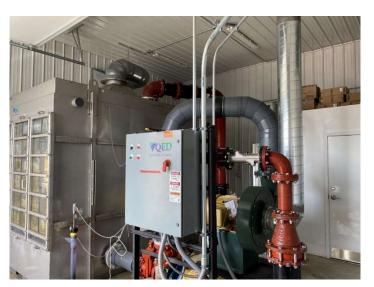
Contaminants of Concern

The Paden City Groundwater Superfund Site consists of soil and groundwater contaminated with the solvent PCE and its breakdown products. PCE (also referred to as perchloroethene, tetrachloroethylene, tetrachloroethene, or PERC) is a volatile organic compound (VOC). These VOCs evaporate (volatilize) under normal indoor temperatures and pressure. PCE is commonly used in commercial and industrial operations such as dry cleaning. The Agency for Toxic Substances and Disease Registry (ATSDR), an arm of the Center for Disease Control (CDC), has a series of summaries about contaminants, called ToxFAQs. A ToxFAQ on PCE (listed as tetrachloroethylene) is available at wwwn.cdc.gov/TSP/ToxFAQs/ToxFAQsLanding.aspx.

The complete list of contaminants of concern (COCs) will be finalized during the Remedial Investigation. COCs are chemicals that need to be addressed by a cleanup action because they pose a potential threat to human health or the environment.

Vapor Intrusion

Vapor Intrusion (VI) is a process where vapors from VOC contamination (such as PCE) in groundwater make their way into indoor air. In some cases, the vapors may accumulate in buildings to levels that may pose a risk to human health due to long-term exposure. The vapors can move up through the soil and can enter buildings through cracks in the foundations, through utility lines, or via other preferential pathways. EPA performed a limited VI investigation during the SI process in 2020. The purpose of the VI sampling performed during the SI was to support a decision on whether the Site should be listed to the NPL. The limited VI investigation included collection of sub-slab soil gas samples, ambient air, and indoor air samples in the vicinity of the former Band Box Cleaners and surrounding residential and commercial



View of the air stripper located next to the Water Treatment Plant.

buildings. This included sampling at the Paden City High School, a residence in Paden City, and from the Paden City Elementary School for background comparison. VOCs were detected in soil gas and indoor air at the high school, elementary school, and the residence, but at low concentrations. PCE did not exceed EPA's screening criteria in any of the samples. A risk assessment was performed and concluded that there were no human health concerns from VI at these locations. Additional VI sampling will be conducted as part of the Remedial Investigation. Once the sampling is complete and the data has been analyzed, EPA will work to ensure that the results are provided to the community in a timely manner. EPA will not be able to publicly release the results for specific privately-owned properties due to privacy concerns but can provide an overview of the general findings in the area. For more information on VI, please visit: www.epa.gov/vaporintrusion.

Other Considerations

Paden City has a decades-long industrial legacy similar to other communities along the Ohio River. Some community members express concerns regarding the impact on public health and the environment from

facilities in the area such as the Corning Glass Works and the Paul Wissmach Glass Company. While these facilities are not part of the Paden City Groundwater Superfund Site, EPA is aware of their operations.

The Corning Glass Works factory operated in Paden City until it closed in 1991. It is currently undergoing a cleanup funded by a \$500,000 EPA Brownfields Cleanup grant. The grant was awarded in May 2021 to the Paden City Development Authority. The Corning Glass Works plant left behind polycyclic aromatic hydrocarbons and heavy metals in the soil at the factory. EPA's Brownfields Program is working with the Paden City Development Authority and other partners to clean up the Corning Glass Works factory and develop a reuse plan for the property. For more information on the Brownfields Cleanup of this property, contact Joseph Nowak in the Land, Chemical, and Redevelopment Division in EPA Region 3 at (215) 814-3303.

The Paul Wissmach Glass Company factory has operated in Paden City since 1901. The factory uses metals in their operations. Concerns over air emissions have been raised by community members. EPA previously issued a Notice of Noncompliance, which notifies a regulated entity regarding potential violations, to the Company. EPA is actively engaged with and continuing to monitor the situation at the Paul Wissmach Glass facility as it pertains to a resolution, as well as any corrective action that may be appropriate and necessary to address pollutants from the facility. For more information on this facility, contact Bruce Augustine in the Office of Enforcement and Compliance Assurance Divison in EPA Region 3 at (215) 814-2131.

Environmental Justice

Environmental Justice (EJ) is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation and enforcement of environmental laws, regulations and policies.

EPA Region 3 programs collaborate closely to make sure underserved, low income and tribal communities facing disproportionate environmental risks have opportunities for meaningful participation in environmental decision-making. Region 3 also coordinates closely with EPA Headquarters and the states of Pennsylvania, Delaware, Maryland, Virginia, West Virginia, as well as the District of Columbia, to support initiatives that provide all people living near Superfund sites



View of Paden City Police Station and City Office.

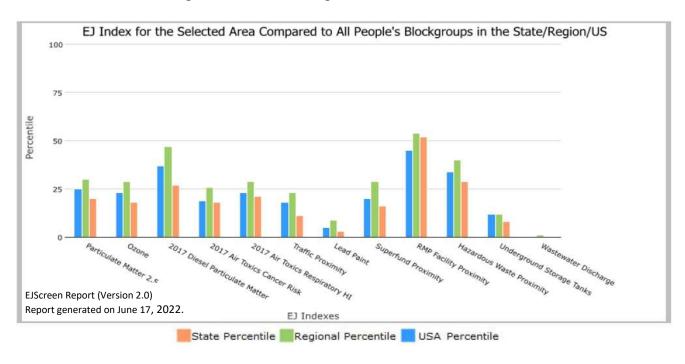
with technical assistance, training opportunities and other services. EPA has a variety of environmental justice resources available at www.epa.gov/environmentaljustice, including:

Environmental Justice Collaborative Problem-Solving Cooperative Agreement Program provides
funding for eligible applicants for projects that address local environmental and public health issues in
an affected community. The program assists recipients in building collaborative partnerships to help
them understand and address environmental and public health concerns in their communities. For
more information, visit www.epa.gov/environmentaljustice/environmental-justice-collaborativeproblem-solving-cooperative-agreement-5.

• Environmental Justice Small Grants Program supports and empowers communities working on solutions to local environmental and public health issues. The program helps communities understand and address exposure to multiple environmental harms and risks. For more information, visit www.epa.gov/environmentaljustice/environmental-justice-small-grants-program.

EJScreen

EJScreen is an environmental justice mapping and screening tool. It uses environmental indicators for a community to show potential exposures and demographic factors to show potential susceptibility. An EJScreen analysis for the Site was prepared in June 2022. Paden City is at the 86th percentile for Ozone pollution, 91st percentile for 2017 Air Toxics Cancer Risk, and 96th percentile for Wastewater Discharge within West Virginia. Paden City is at the 88th percentile for Linguistically Isolated within West Virginia and at the 80th percentile for individuals Over Age 64 within West Virginia.



EJScreen Quick Facts

To summarize how environmental indicators and demographics come together in the same location, EJScreen uses EJ Indexes. EJScreen has 12 EJ Indexes that reflect the 12 environmental indicators below. In the EJ Indexes, environmental indicators are combined with information about the low-income and minority population in a Census block group. EJScreen presents results in terms of percentiles, allowing the community to be compared to the rest of the state, EPA Region, or nation.

- National Scale Air Toxics Assessment Air Toxics Cancer Risk
- National Scale Air Toxics Assessment Respiratory Hazard Index
- National Scale Air Toxics Assessment Diesel Particulate Matter
- Particulate Matter (PM2.5)
- Ozone
- Lead Paint Indicator

- Traffic Proximity and Volume
- Proximity to Risk Management Plan Sites
- Proximity to Hazardous Waste Facilities
- Proximity to NPL Sites
- Underground Storage Tanks Indicator
- Wastewater Discharge Indicator

Government and the Superfund Process

EPA administers the federal government's Superfund program. EPA is part of the executive branch of the federal government – meaning EPA implements and enforces federal laws and regulations. The Superfund program is supported by other EPA offices and government agencies. All relevant offices and agencies coordinate to address contaminated sites, protect human health and the environment, pursue those responsible for the contamination, and support redevelopment of cleaned-up sites to restore and revitalize communities. The following table describes the roles and responsibilities of the government agencies that may be involved at the Paden City Groundwater Superfund Site.

Federal Agencies

Federal agencies are created by laws passed by Congress or through presidential executive orders. Federal agencies determine how federal laws should be implemented across the United States and its territories. Each federal agency implements different laws and their respective work falls within the parameters of those laws. Multiple federal agencies may become involved to help address local situations, depending upon the agencies' mission and expertise.



U.S. Environmental Protection Agency (EPA)



Agency for Toxic Substances and Disease Registry (ATSDR) EPA manages the national Superfund program through its headquarters in Washington, D.C. and 10 regional offices. EPA has the authority to clean up uncontrolled or abandoned releases of contamination, such as asbestos and lead, that pose a threat to public health and the environment, which includes – but is not limited to – sites on the NPL. EPA's Superfund program oversees long-term cleanups (known as remedial actions) and short-term cleanups (known as removal actions). Removal actions can be either emergency, time-critical or non-time-critical depending on the extent and type of contamination.

ATSDR is part of the Centers for Disease Control and Prevention (CDC), within the U.S. Department of Health and Human Services. The 1980 CERCLA Act (commonly known as Superfund) created ATSDR to address community concerns about hazardous waste. ATSDR responds to and protects people from harmful exposures to contaminants. During the Superfund process, ATSDR conducts public health assessments and health consultations at NPL sites, as well as all sites proposed for the NPL.

- A public health assessment evaluates the level or concentrations of hazardous substances; whether and how people may be exposed to contamination; what levels of a substance may cause harm to people; whether working or living near the site may affect people's health; and other dangers to people at the site, such as unsafe buildings or abandoned mine shafts. ATSDR and other agencies may use public health assessments to determine whether further studies or public health actions are necessary.
- A health consultation is a response to a specific request for information about health risks related to a specific site, a chemical release, or the presence of a hazardous substance.

ATSDR is in the process of preparing a Health Assessment for the Paden City Groundwater Superfund Site.

State Agencies

Each state government has its own constitution and state agencies and is responsible for enforcing local laws that are separate from federal laws. At Superfund sites, EPA may enter into either cooperative agreements or contracts with state agencies to perform hazardous waste cleanup actions. A Superfund cooperative agreement is a legal agreement that provides for funds to be transferred from EPA to a state or tribal government for cleanup activities. If EPA is considering the Superfund Alternative approach for a site, EPA consults with and receives approval from the state in which the site is located.



For the Paden City Groundwater Superfund Site, EPA is the lead agency and WVDEP is the support agency. EPA is required to work with state environmental agencies during negotiations with parties known as potentially responsible parties (PRPs) that may have contributed to or caused the contamination at a site. EPA and WVDEP also work together during the NPL listing and deletion process, site investigations, and the selection and implementation of site cleanup remedies. States share the costs of Fund-financed remedial actions incurred at sites listed on the NPL.

The West Virginia Department of Health and Human Resources (WVDHHR) has staff with expertise that can inform site-related public health issues, including regional office staff who can share local health information and perspectives. The ATSDR may enter into agreements with state health departments to conduct public health assessments or health consultations at the site.

Local Government

Local governments generally include counties (or boroughs or parishes) and municipalities (such as cities or towns). EPA and state environmental agencies keep local officials aware of cleanup progress through telephone conversations, emails, in-person meetings and briefings. City and county government agencies may also provide key information about Superfund sites, including information on past site operations and parties that may have contributed to contamination.



Paden City is an incorporated city located in Tyler and Wetzel counties in the state of West Virginia.

Paden City's Department of Public Works operates a public water system. Public drinking water systems are regulated by EPA and delegated states, such as West Virginia.

Our Partners

Our partners include the Agency for Toxic Substances and Disease Registry (ATSDR), West Virginia Department of Environmental Protection (WVDEP), West Virginia Department of Health and Human Resources (WVDHHR), Paden City, and others.

Key Contacts

EPA Contacts

Victoria Schantz
Remedial Project Manager
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103
(215) 814-3246
schantz.victoria@epa.gov

Eric Pollard
Community Involvement Coordinator
EPA Region 3
1600 John F. Kennedy Blvd
Philadelphia PA 19103
(215) 814-5535
pollard.eric@epa.gov

John Brakeall Community Involvement Coordinator EPA Region 3 1600 John F. Kennedy Blvd Philadelphia PA 19103 (215) 814-5537 brakeall.john@epa.gov

Site Partner Contacts

Emily Adler
Regional Representative, Region 3
Office of Community Health &
Hazard Assessment
ATSDR/CDC
1600 John F. Kennedy Blvd
Philadelphia PA 19103
(215) 880-7304
qgk3@cdc.gov

William (Bill) Huggins
Project Manager/Supervisor
WVDEP
131A Peninsula Street
Wheeling, WV 26003
(304) 382-7712
william.huggins@wv.gov

Robert (Bob) Smith Engineer Supervisor WVDHHR 69 16th Street Wheeling, WV 26003 (304) 238-1145 bob.a.smith@wv.gov

Elected Officials

Paden City Mayor Steve Kastigar 208 West Main Street Paden City, WV 26159 (304) 337-8044

State House. Visit www.wvlegislature.gov/House/roster.cfm for contact information for your current representative. Paden City is in District 2 of the West Virginia House.

State Senate. Visit www.wvlegislature.gov/Senate1/roster.cfm for contact information for your current senator. Paden City is in District 2 of the West Virginia Senate.

U.S. House of Representatives. Visit www.house.gov/representatives/find-your-representative for contact information for your current congressional representative. Paden City is located in the 2nd Congressional district of West Virginia.

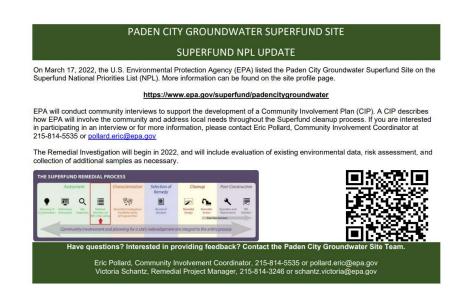
U.S. Senate. Visit www.senate.gov/senators for contact information for your current U.S. senators for West Virginia.

Past Community Involvement Activities

Since the beginning of EPA's presence at the Site, EPA Community Involvement Coordinators (CICs) hosted public meetings and mailed out fact sheets about ongoing investigations and Site updates. The CICs used fact sheets, postcards, videos, phone calls with residents/stakeholders, and public meetings to inform, engage, and hear from community members. EPA used the information gained from past community involvement activities to inform this CIP.

The images below show examples of a video and postcard that the Site team created for the Paden City community in 2021 and 2022. The full videos and other community-wide mailers can be found on the EPA Paden City Groundwater Site Profile Page at www.epa.gov/superfund/padencitygroundwater.





Situation Assessment

EPA staff utilized the Conflict Prevention and Resolution Center (CPRC) program to facilitatea Situation Assessment performed by a neutral third-party contractor in June 2022. This assessment helped the Site team better understand community sentiments and respond accordingly. The Situation Assessment was prepared by Robin Roberts of Perdido, LLC. Mr. Roberts interviewed a total of nine (9) stakeholders. A list of the questions asked during the interviews is provided in Appendix G. A summary of stakeholder questions and concerns is presented below.

The stakeholders are aware that Paden City shares a decades-long industrial legacy with many small towns like it along the banks of the Ohio River. They understand that the heavy industrial activity left behind enduring contaminants in the ground, air, water, and groundwater. They feel the PCE contamination associated with the Paden City Groundwater Superfund Site is only the latest contaminant to be discovered.

Some stakeholders noted that exposure to PCE in the drinking water appears to be followed by an alarming rise in the incidence of certain health effects such as amyotrophic lateral sclerosis (ALS), certain types of cancers and neurological disorders. Though these stakeholders understand the difficulty and nuances of

establishing causation or correlation between chronic diseases and PCE exposure, they insist that further investigation is warranted given the high incidence of chronic diseases in Paden City's population. Other stakeholders are not as sure about the link between PCE and adverse health effects.

Stakeholders feel EPA should launch a sustained and robust public engagement process that keeps residents informed about and involved in the effort to remediate the Site. All stakeholders believe that EPA should be transparent and more timely about providing the latest, most comprehensive, and easily accessible information. Some stakeholders note that remote meetings are not ideal for the community because many residents do not have internet access. EPA's inability to travel due to the Site during the height of the COVID-19 pandemic from 2020 to 2022 caused additional frustration in the community. However, some stakeholders were appreciative of the efforts EPA made following COVID-19 to understand and work with the community.

The interviewees expressed multiple concerns and questions regarding the air stripper water treatment system that went online in May 2020. Concerns included the location in a residential neighborhood, noise level of the system, efficacy of the system, and air emissions being released. Some stakeholders wanted the plant's air emissions to be tested.

Multiple people expressed concerns regarding vapor intrusion into homes resulting from the PCE contamination. There appeared to be confusion regarding the results of the initial vapor intrusion sampling that was performed by EPA during the Site Inspection. Stakeholders do not feel the results were shared or explained properly to the community.

EPA used the information gained from the Situation Assessment to inform this CIP as well as to prepare for a Superfund Workshop for the Paden City community.

Superfund Workshop

EPA hosted a Superfund Workshop through the Technical Assistance Services for Communities (TASC) program on September 27, 2022. This was the first Superfund Workshop in the nation, held as part of a headquarters pilot program, which is a national effort to strengthen early community engagement at Superfund sites. EPA also aimed to address many of the questions and concerns at the Workshop that were brought to light during the Situation Assessment and from talking to community members.

Representatives from EPA Region 3, EPA Headquarters, WVDEP, WVDHHR, ATSDR, and the local government assisted in the development and execution of the Workshop. Mr. Roberts, the CPRC contractor who performed the Situation Assessment, acted as facilitator for the workshop.



Superfund Workshop hosted at the Paden City High School on Tuesday, September 27, 2022.

Due to the clear need for stronger engagement, a large effort was put into advertising the Workshop. Outreach included mailed postcards, newspaper public notices, emailed factsheets, distribution of factsheets to students in the High School, posts on EPA and local organizations' social media pages, and use of electronic billboard signage in town. The Workshop included an Open House, formal presentations with question-and-answer sessions, and a listening session. EPA presented on the Superfund Process as well as information about the Site. This included what can be expected during the Remedial Investigation phase, projected timelines, types of sampling that will be performed, and what to expect next in terms of community engagement. To tailor the information presented to the needs of the community, EPA presented on three of the main topics (health effects, the air stripper, and vapor intrusion) identified during the Situation Assessment.

Approximately 40 people attended, and most were very engaged with many questions and comments. EPA used the community input from the Workshop to inform this CIP as well as adjust the Remedial Investigation workplan to address the needs of the community.

Overview of the CIP Process

EPA used the information gained from past community involvement activities, described above, to aid in the development of this CIP. EPA completed additional interviews of two (2) community members during a visit to Paden City in July 2022. The individuals interviewed during the Situation Assessment, and during EPA's visits to Paden City, provide a broad representation of the community. The interviews included members of the Water Crisis Facebook group, Paden City Development Authority, City of Paden City, and Paden City residents/ stakeholders.

Community Issues and Concerns

COMMUNITY INVOLVEMENT



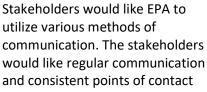
Many stakeholders expressed interest in staying well-informed and being meaningfully involved in the decision-making process. EPA will try to address as many of their concerns as possible. EPA understands that stakeholders expect effective communication with the community and will strive to do so.

HUMAN HEALTH



Stakeholders expressed concerns regarding possible long-term adverse health effects that could result from drinking water contaminated with PCE. Some stakeholders believe that certain illnesses and diseases are more prevalent in Paden City.

METHOD OF COMMUNICATION



and consistent points of contact within EPA in order to build and maintain a productive relationship.

CONTAMINATION



Some stakeholders had concerns regarding the efficacy of the air stripper. Concerns were also shared regarding the possibility of vapor intrusion occuring in homes due to the presence of groundwater contamination.

ECONOMY



Many stakeholders stated that Paden City's economy, like many small towns along the banks of the Ohio River, was previously dependent on industrial activity. The Stakeholders recognize that this historic industry contributed to pollution in Paden City.

CLEANUP



Some stakeholders expressed concern regarding the timeliness of response. Frustrations were shared regarding how long the Superfund Process will take.

THE COMMUNITY INVOLVEMENT ACTION PLAN

Introduction to the Action Plan

EPA will continue to coordinate with city and state staff, elected officials, and area organizations to ensure that important Site updates and information are shared with the community. EPA will use different activities to share information and speak with community members, such as:

Periodic Updates

EPA staff will develop and distribute information about the Site through factsheets, flyers, and postcards on a reoccurring and as-needed basis. These will:

- Provide updates about the Superfund process.
- Notify the public about upcoming meetings, availability sessions, and/or public comment periods.
- Provide links to publicly available documents and other resources.
- Provide proper notice in advance to parents and students about any work performed in the schools or public spaces.
- Provide proper updates on any results or findings for any sampling performed at public locations, including but not limited to the Paden City schools.

EPA will provide periodic updates via electronic and regular mail. Updates will also be available on the Site Profile Page at www.epa.gov/superfund/padencitygroundwater.

Mailing List

EPA staff will continue to build and maintain a Site mailing list. To be added to the mailing list, please send a request by email, telephone, or regular mail to EPA CIC Eric Pollard (pollard.eric@epa.gov).

Community Meetings

Based on availability, EPA staff may attend meetings held by community groups, the local government, and other organizations upon request. EPA will share information about the Site and address community questions, concerns, ideas, and comments.

EPA staff may host meetings, workshops, and/or open houses to share information with the community. Meetings will be held at a central location that is easily accessible and Americans with Disabilities Act (ADA)-accessible. Interviewees were supportive of EPA hosting such meetings at the Paden City High School.

EPA staff may host or participate in meetings virtually, as coordinated with the community. To best accommodate community members, EPA staff may provide options to participate by phone for people unable to join a web-based meeting. EPA staff may share meeting materials ahead of the meeting so people unable to

view the presentation can follow along. EPA understands from interviews that the community seems to prefer in-person meetings, but are not opposed to some virtual meetings as well.

Briefings with Local Officials

EPA will brief local officials on request. EPA will coordinate with additional elected officials as requested. Please see page 10 for contact information for federal, state, and local elected officials.

Media

EPA uses the Wetzel Chronicle, the Tyler Star News, and/or the Innformer to publicize important information and to give public notice related to the Site. EPA may also receive inquiries from media outlets regarding the Site. EPA staff will be available for interviews and will respond to such media inquiries in a timely fashion. Inquiries from the news media should be directed to EPA CIC John Brakeall (brakeall.john@epa.gov).

Social Media

EPA will share Site updates through Facebook, Twitter, and other social media such as:

- EPA Region 3 Facebook: www.facebook.com/EPAregion3/
- EPA Region 3 Twitter: <u>twitter.com/EPAregion3</u>
- EPA Site webpage (Stay Updated, Get Involved page): www.epa.gov/superfund/padencitygroundwater

Information Repository

Cleanup documents and reference materials for the Paden City Groundwater Superfund Site can be accessed through the Site webpage, at epa-gov/superfund/padencitygroundwater, and at the below locations.

Paden City Public Library 114 S 4th Ave, Paden City, WV 26159 (304) 337-9333

U.S. EPA Region 3
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103
(215) 814-2396
Please call to schedule an appointment.

Some of the materials available include NPL Site Listing Narrative, Site fact sheets, and Press Releases. Information at the repositories is primarily provided electronically, but hard copies are available upon request. The local information repository set up at the Paden City Library is available for community members who do not have access to internet or a computer. The librarian can assist community members in using the public computer and accessing the electronic record.

Formal Public Comment Periods

During the Superfund process, EPA opens public comment periods and encourages people to submit questions and comments. EPA accepts formal comments on several types of documents, such as Proposed Plans, as well as when EPA proposes a site for listing on or deletion from the NPL. EPA considers all public comments in the Superfund decision-making process. EPA will notify all community members by mail when there is an upcoming comment period.

Public Comment Tips

Commenting is an important way to make your voice heard. Public comments can strengthen an environmental decision by providing the authoring agency with facts or perspectives lacking in the original draft. Commenting helps EPA create an accurate and comprehensive document to support appropriate and informed decision-making.

- Prepare for commenting by familiarizing yourself with the scope of the issue and relevant laws.
- Identify your key issues and concerns.
- Identify allies who can help with the document review and understanding of the report and coordinate your comments with them to strengthen your message.
- Be specific with your comments, including what you think could improve the document, what you
 think is missing from the document, what you like about the document, and what parts you want to
 remain in the document.

APPENDICES

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Appendix A - Acronyms and Abbreviations

ALS	Amyotrophic Lateral Sclerosis	NPL	National Priorities List	
ATSDR	Agency for Toxic Substances and Disease Registry	PCE Tetrachloroethylene		
CAG	Community Advisory Group	RI Remedial Investigation		
CDC	Centers for Disease Control and Prevention	ROD Record of Decision		
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act	RPM Remedial Project Manager		
CIC	Community Involvement Coordinator	SARA	Superfund Amendments and Reauthorization Act	
CIP	Community Involvement Plan	SI	Site Investigation	
COCs	Contaminants of Concern	TAG	Technical Assistance Grant	
EJ	Environmental Justice	TASC Technical Assistance Services for Communities		
EPA	United States Environmental Protection Agency	VI	Vapor Intrusion	
FS	Feasibility Study	VOCs	Volatile Organic Compounds	
HRS	Hazard Ranking System	WVDEP	West Virginia Department of Environmental Protection	
NCP	National Oil and Hazardous Substances Pollution Contingency Plan	WVDHHR	West Virginia Department of Health and Human Resources	

Appendix B - Glossary

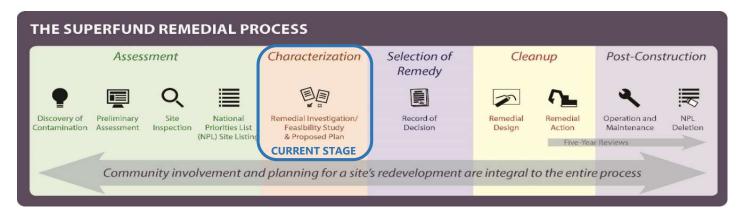
Air Stripping	The process of moving air through contaminated water in an above-ground treatment system to remove chemicals called volatile organic compounds (VOC). An air stripper forces air through contaminated water and evaporates VOCs.		
Cleanup	The term used for actions taken to deal with a release or threat of release of a hazardous substance that could affect human health and/or the environment. The term is sometimes used interchangeably with the terms remedial action, removal action, response action and corrective action.		
Community Involvement	The community relations activities (e.g., plan, implementation and responsiveness summary) that must be completed at a site to address community concerns.		
Community Involvement Plan (CIP)	A document that identifies techniques used by EPA to communicate effectively with the public during the Superfund cleanup process at a specific site. A CIP typically describes the site history, nature and history of community involvement, and concerns expressed during community interviews. In addition, the plan outlines methodologies and timing for continued interaction between the agencies and the public at the site.		
Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (commonly known as Superfund)	A law, enacted by Congress in December 1980, that created the Superfund program. CERCLA provides EPA with the authority to clean up contaminated sites and identifies parties that may be held responsible for performing cleanup work or reimbursing the government for cleanup costs.		
Concentration	The amount of a chemical in a given volume of air, water, or other medium.		
Contamination	Introduction into water, air, and soil of microorganisms, chemicals, toxic substances, wastes, or wastewater in a concentration that makes the medium unfit for its next intended use.		
Environmental Justice (EJ)	The fair treatment and meaningful involvement of all people regardless of race, color, national origin or income, with respect to the development, implementation and enforcement of environmental laws, regulations and policies.		
Exposure	Contact with a substance by swallowing, breathing, or touching the skin or eyes. Exposure may be short-term (acute exposure), of intermediate duration, or long-term (chronic exposure).		
Feasibility Study (FS)	A process followed at most Superfund sites to evaluate potential cleanup alternatives.		
Five-Year Review	A periodic review of a Superfund site that is generally required when hazardous substances remain on site above levels that permit unrestricted use and unlimited exposure. The purpose of a Five-Year Review is to evaluate the implementation		

	and performance of a remedy and whether a remedy remains protective of public health and the environment.		
Groundwater	The supply of fresh water found beneath the Earth's surface, usually in aquifers, which supply wells and springs. Because groundwater is a major source of drinking and irrigation water, there is growing concern over contamination from leaching agricultural or industrial pollutants.		
Hazard Ranking Score (HRS)	The Hazard Ranking System (HRS) is the principal screening tool used by EPA to evaluate relative risks to public health and the environment associated with abandoned or uncontrolled hazardous waste sites. The HRS is a screening tool and not a site-specific risk assessment. The HRS calculates a site score between 0 and 100 based on the actual and/or potential releases of hazardous substances from the site through the air, surface water, or groundwater, or the actual and/or potential exposure of receptors by coming into contact with contamination. The score is based on many other factors such as density and proximity of human population to contamination. A site receiving an HRS score of 28.5 or above is eligible for placing on the National Priorities List (NPL). This score is the primary factor in deciding if the site should be on the NPL and has no significance as an indicator of a specific risk level to people or environmental receptors. The limited data used to develop the HRS score are designed to support site screening and are not intended to provide support for a quantitative risk assessment. The HRS, therefore, is a mechanism that allows EPA to make objective decisions on national priorities across sites nation-wide.		
Information Repository	A collection of technical reports and other documents regarding a Superfund site. The information repository is usually located in a public building that is convenient for local residents, such as a public school, city hall or library.		
National Contingency Plan (NCP)	The federal government's blueprint for responding to oil spills and releases of hazardous substances.		
National Priorities List (NPL)	EPA's list of uncontrolled or abandoned hazardous waste sites identified for possible long-term remedial action under the Superfund program. A site must be on the NPL to receive money from the Superfund Trust Fund for remedial action.		
Potentially Responsible Party (PRP)	Any individual or companyincluding owners, operators, transporters or generatorspotentially responsible for, or contributing to a spill or other contamination at a Superfund site. Whenever possible, through administrative and legal actions, EPA requires PRPs to clean up hazardous sites they have contaminated.		
Preliminary Assessment	An assessment of information about a site and its surrounding area. A Preliminary Assessment is designed to determine whether a site poses little or no threat to human health and the environment or if it does pose a threat, whether the threat requires further investigation.		

Record of Decision (ROD)	A public document that explains which cleanup alternative(s) will be used at National Priorities List sites.		
Remedial Action	The actual construction or implementation phase of a Superfund site cleanup that follows remedial design.		
Remedial Design	Remedy design (RD) is the phase in Superfund site cleanup where the technical specifications for cleanup remedies and technologies are designed.		
Remedy	The method selected to clean up a Superfund site.		
Removal Action	Short-term actions that address releases of hazardous substances that require expedited responses. Removals can occur at any stage of the Superfund cleanup process but are often the first response upon discovery of a hazardous substance at a site.		
Risk/ Health Assessment	At each site, EPA determines the possibility for human and ecological contact (i.e., exposure) with contaminants at the site. If the possibility for exposure to contamination exists, EPA conducts a study known as a risk assessment. During the risk assessment, EPA determines if the site poses a risk to humans, and if so, identifies actions that can be taken to control any possible exposure to humans until site cleanup has been completed. Once complete, cleanup provides long-term human health and environmental protection at the site.		
Site Inspection (SI)	A Site Inspection (SI) is the process of collecting site data and samples to characterize the severity of the hazard ranking score (HRS) and/or for enforcement support. SI investigators typically collect environmental and waste samples to determine what hazardous substances are present at a site. They determine if these substances are being released to the environment and assess if they have reached nearby targets.		
Vapor Intrusion (VI)	A process where vapors from volatile organic compound (VOC) contamination in groundwater make their way into indoor air.		
Volatile Organic Compound (VOC)	Organic compounds that have relatively low boiling temperatures and high vapor pressure at room temperature. VOCs are emitted as gases from certain solids or liquids.		

Appendix C - Overview of the Superfund Remedial Process

After Superfund sites are discovered or identified, EPA uses two basic types of responses to manage polluted sites: removal actions and remedial actions. Removal actions handle emergency oil spills, chemical releases, and short-term responses. Emergency actions eliminate immediate risks and ensure public safety. Remedial actions handle complex sites needing long-term responses. Remedial actions manage releases that do not pose an urgent threat to public health or the environment and do not require immediate action. Remedial actions involve complex and highly contaminated sites that often require several years to study the problem, develop a permanent solution, and clean up the hazardous waste. These are the sites that most people think of when they hear about the Superfund program. The section below describes the general steps in EPA's



Superfund remedial process.

Assessment

EPA determines if a site poses a threat to people and the environment and whether hazards need to be addressed immediately or if additional site information will be collected. EPA uses the information collected during the assessment phase of the Superfund process to score sites according to the danger they may pose to human health and the environment. If a site has a high enough score on the Hazard Ranking System (HRS) and meets all other criteria, EPA may propose it for listing on the NPL.

Characterization

Once a site is on the NPL, further investigation into the problems at the site and the best way to address them is required. This is called the remedial investigation and feasibility study (RI/FS). After development of cleanup alternatives, EPA recommends the option it considers best for the site and offers it to the community for evaluation and comment in a Proposed Plan.

Selection of Remedy

The cleanup method ultimately chosen for the site, and the reasons for the selection, are set forth in the Record of Decision (ROD). The ROD discusses all activities prior to the selection of a cleanup method and describes how the cleanup method will be protective of human health and the environment.

Cleanup

The cleanup phase includes two parts. During the remedial design phase, plans for the cleanup method are carefully designed. The remedial action starts the actual cleanup at a site.

Post-Construction

After EPA determines that the physical construction at a site is complete, post-construction activities ensure that the cleanup actions will protect human health and the environment over the long term. These activities may include routine maintenance at a site such as making sure signs and fences are intact or soil treatment systems are running smoothly. EPA may delete a site or portion of a site (sometimes called an operable unit) from the NPL if all cleanup goals have been met and no further cleanup action is required to protect human health and the environment.

THE SUPERFUND REMEDIAL PROCESS

ASSESSMENT



Discovery of Contamination



Preliminary Assessment



Site Inspection



National Priorities List (NPL)
Site Listing

CHARACTERIZATION



Remedial Investigation/ Feasibility Study & Proposed Plan Community involvement and planning for a site's redevelopment are integral to the entire process

Five-Year Reviews

SELECTION OF REMEDY



Record of Decision

CLEANUP



Remedial Design



Remedial Action

POST-CONSTRUCTION



Operation and Maintenance



NPL Deletion

Opportunities for Public Participation

Reach out to the EPA site team to provide useful information about the Site or ask questions.

Provide comments on EPA's proposal to add the Site to the NPL.



Provide comments on the proposed plan.



Opportunities for Engaging in the Superfund Process:

- Ask questions or request additional information by contacting the EPA site team.
- Participate in EPA public events.
- Visit the local information repository or site webpage to read site documents.
- Read information about the Site in fact sheets, public notices, and EPA's website.
- Invite EPA staff to attend community events to discuss the Site.
- Arrange a site tour with EPA staff.

Request to be interviewed by the EPA site team as part of the five-year review process.

Provide comments on EPA's proposal to delete the Site from the NPL.

Appendix D – Overview of the Superfund Removal Process

Removal responses are common at Superfund sites when the contamination poses an immediate threat to human health and the environment. Removal actions tend to be swift responses to immediate threats from hazardous substances, pollutants or contaminants to eliminate dangers to the public. Removals are classified as either emergency, time-critical or non-time-critical, depending on the extent and type of contamination.

<u>Superfund Removal Process – Emergency Response</u>

Emergency removal responses require an immediate response to releases or threatened releases to the environment. Emergency removals start within hours or days of the determination that a removal action is appropriate. Typical emergency removals address immediate threats such as fires, explosions, toxic spills and imminent contamination of a water supply. The following section describes the general steps in an emergency removal response.



Assessment

After the contamination is discovered, EPA evaluates if the site poses a threat to people and the environment and whether hazards need to be addressed immediately or additional site information will be collected.

Removal

The Action Memorandum describes the cleanup method chosen for the site and the reasons for the selection. Because an emergency removal can begin within hours or days of the determination that a removal is appropriate, there is little or no time for planning. Removal action may take place prior to the signing of the Action Memorandum.

Post-Removal

After the removal action, site controls are implemented to protect human health and the environment if needed. Additional site evaluation may take place to determine whether further action is needed.

<u>Superfund Removal Process – Time-Critical Removal</u>

Time-critical removals are situations where EPA determines that a removal is appropriate and on-site removal activities must begin within six months. Examples include removal of drums or small volumes of contaminated soil and stabilization of lagoons. The following section describes the general steps in a time-critical removal.



Assessment

After the contamination is discovered, EPA evaluates if the site poses a threat to people and the environment and whether hazards need to be addressed immediately or additional site information will be collected.

Removal

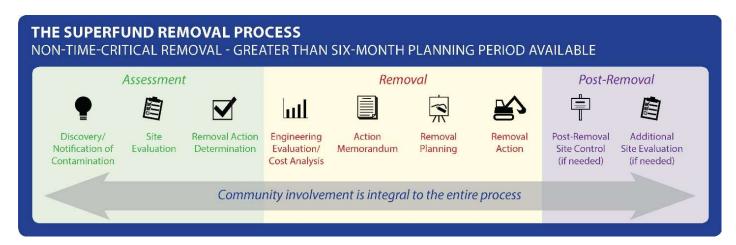
The Action Memorandum describes the cleanup method chosen for the site and the reasons for the selection. Removal planning is the phase during which the plans for removal are designed, and then removal action begins.

Post-Removal

After the removal action, site controls are implemented to protect human health and the environment if needed. Additional site evaluation may take place to determine whether further action is needed.

Superfund Removal Process – Non-Time-Critical Removal

Non-time-critical removals happen when EPA determines that a removal action is appropriate, and the situation allows for a planning period of at least six months before on-site activities must begin. Because non-time-critical removal sites do not present an immediate threat to public health or safety, more time is available to thoroughly assess potential threats and evaluate cleanup alternatives. The following section describes the general steps in a non-time-critical removal.



Assessment

After discovery of the contamination, EPA evaluates if the site poses a threat to people and the environment and whether hazards need to be addressed immediately or additional site information will be collected.

Removal

An engineering evaluation and cost analysis (EE/CA) is prepared to analyze removal alternatives. The report is available to the public for review and comment. The Action Memorandum describes the cleanup method chosen for the site and the reasons for the selection. During the removal planning phase, design plans for the removal are developed. Then, the removal action begins.

Post-Removal

After the removal action, site controls are put in place to protect human health and the environment if needed. Additional site evaluation may take place to determine whether further action is needed.

Appendix E – Resources for the Community

EPA provides additional assistance to communities through a variety of technical assistance resources. These resources include the Technical Assistance Grant (TAG) program, the Technical Assistance Services for Communities (TASC) program and Community Advisory Group (CAG) formation support. For more information on these resources, please visit: www.epa.gov/superfund/superfund-technical-assistance-communities.

	TAG	TASC	CAG Formation Support
Overview of Program/ Support	 Awards grants to eligible community groups affected by the Superfund NPL sites and proposed NPL sites to contract with independent technical advisors to provide the services listed below. Community groups must be able to manage a grant, be an incorporated non-profit and provide a 20% match, which can include in-kind services. 	services through a national EPA contract Superfund NPL sites posed NPL sites to all advisors to provide vices listed below. Inity groups must be manage a grant, be reporated non-profit vide a 20% match, an include in-kind	
Services	 Review and explanations of site technical documents and information. Comments on technical documents. 	 Review and explanations of site technical documents and information. Comments on technical documents. Community trainings and workshops. Educational presentations. Technical assistance needs assessments. Facilitation of community meetings. Technical advisor services during community meetings. Outreach and educational materials for communities. Assistance understanding the environmental decision-making process. Language translations. 	 Informational meeting about CAGs. Assistance in determining CAG size and membership. Training for CAG members. Administrative support and translation and meeting facilitation services.

EPA Region 3 CAG and TASC Coordinator

Lisa Trakis (215) 814-5433 trakis.lisa@epa.gov

EPA Region 3 TAG Coordinator

John Brakeall (215) 814-5537 brakeall.john@epa.gov

Translations and Language Access

EPA may provide written information about the Site in English and other languages that are prevalently used in the community. Language interpretation can be used at meetings as needed. EPA is not aware of a need for translation at this time. All virtual presentation materials, including recorded meetings and pre-recorded informational videos, will have closed captions.

Appendix F - Community Involvement Plan Community/Stakeholder Interview Questionnaire

EPA used the following questions when conducting community interviews about the Site. The responses from these questions informed the Community Issues and Concerns section of this CIP.

About the Site

- 1. What do you know about the Paden City Groundwater Superfund Site?
- 2. Do you have any concerns about the cleanup work taking place at the study area?
- 3. If you have concerns about the Site, what are they?
- 4. Do you have any thoughts on how the Site area can be reused? Are you aware of any redevelopment plans for the Site area, and how do you feel about their potential impact on your organization/community?

Communication Preferences

- 5. How would you like to receive Site information?
- 6. In what format or setting would you like to receive information?
- 7. How often would you like to receive Site information?
- 8. Do you know of people living in the study area who need Site update information in a language other than English? If so, what language(s)?
- 9. Where do you prefer to go for news about current issues?
- 10. How would you describe your experience communicating with Site team members? The Site team is currently made up of staff from EPA, WVDEP, ATSDR, Paden City, and our contractors.
- 11. Do you have any suggestions on how we can improve communication?

Meetings

- 12. We intend to host a Superfund Workshop meeting at the High School's multipurpose room in fall 2022. How convenient is this location?
- 13. Do you have any recommendations for other meeting locations?
- 14. Would you be able to participate in meetings virtually if needed? Do you have access to reliable internet?
- 15. We intend to hold the meeting in the evening is that a good time for you and/or most people?
- 16. How often do you think community meetings should be held to have detailed conversations about Site activities?
- 17. What style of meeting do you prefer?

Outreach and Education

18. What kind of Site information would you like to receive?

Wrap-Up Questions

- 19. Who else do you think we should talk to?
- 20. Is there anything else you would like to share with us?
- 21. Would you like to be added to our notification list to get updates about the Site (for example, when the draft Community Involvement Plan is ready for community review)?
- 22. Would you like to receive a hard copy of the Community Involvement Plan or have a hard copy available at the local information repository?

Appendix G - Situation Assessment Interview Questionnaire

EPA's contractor used the following questions when conducting community interviews about the Site for the Situation Assessment. The responses from these questions informed the Community Issues and Concerns section of this CIP.

- 1. Please tell me your full name, how long you lived in the community, and little bit about your history and interests in the community.
- 2. How do you view the current groundwater contamination situation?
 - a. What issues have informed your view?
 - b. What are your main concerns about the Site?
 - c. What information and sources of information are available to you now?
 - d. What other information would be helpful?
- 3. What issues concern you most about the Paden City Groundwater Contamination Superfund Site?
 - a. Do you have concerns about the Paden City air stripper?
 - i. Do you believe it remediates groundwater to exceed safe drinking water standards?
 - b. In 2020, EPA conducted a limited vapor intrusion investigation that included sampling at the local elementary and high schools. The sampling results indicated an immediate and substantial threat to human health and the environment. The sampling results were provided to property owners via mail but it is not clear how many residents received the sampling results.
 - i. Did you or anyone you know receive the mailed sampling results?
 - ii. How could the sampling results have been distributed more broadly?
 - c. Additional vapor intrusion investigations of 200-300 homes may be required. What is the best way to inform/educate homeowners about the need for these investigations and update regularly?
 - d. How important is groundwater contamination and vapor intrusion to you personally? To the larger community?
 - e. What other issues about the Site concern you? Why?
 - f. Is the available information about the Site helpful? Why or why not?
 - g. What other information would be helpful to you?
- 4. Who's affected?
 - a. Who else should I be speaking to?
 - b. Whose support is crucial to ensure that the investigations are conducted with stakeholder support?
 - c. Who is most likely to support the investigations? Why?
 - d. Who is most likely to not support the investigations? Why?
- 4. How would you like to be involved in the investigations?
 - a. What role would you like to play or do you feel the community would like to play in the investigations or other EPA activities?
 - b. What are the best forums for your involvement?
 - c. How would you like to receive information?
 - d. What the sources of information do you use and trust?

PADEN CITY GROUNDWATER SUPERFUND SITE COMMUNITY INVOLVEMENT PLAN

2023

March

www.epa.gov/superfund/padencitygroundwater

