



WEST LAKE LANDFILL SUPERFUND SITE COMMUNITY INVOLVEMENT PLAN



March 2023

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INTRODUCTION

The goal of this Community Involvement Plan (CIP) is to encourage and facilitate community engagement throughout the cleanup of the West Lake Landfill Superfund site (the Site). The CIP describes how the U.S Environmental Protection Agency (EPA) will involve the community and address local needs during the Superfund process. The EPA and the community will work together 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 is based on a series of community interviews conducted in July, August and October 2022 with the affected community and stakeholders in accordance with [EPA's Superfund community involvement and cleanup guidance](#). 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 West Lake Landfill 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.

ABOUT THE SITE

Site Overview

The 200-acre Site is located at 13570 St. Charles Rock Road in Bridgeton, Missouri. Active quarrying for limestone took place on site from 1939 to 1985. Municipal waste landfilling operations began on site during the 1950s. Some areas within the Site were radiologically contaminated in 1973, when uranium ore processing residues (leached barium sulfate) mixed with soils were brought to the landfill and presumably used as daily cover in landfilling operations. As part of the initial investigations at the site, the Department of Energy conducted an aerial gamma survey to help identify radioactive materials at the site. This survey helped identify radioactive material at the landfill in areas now referred to as Area 1 and Area 2. Material with radioactive contamination at the site, primarily from radium and thorium, is referred to as Radiologically Impacted Material or RIM.



Industry located in the site area.

EPA proposed listing the Site on the Superfund program's National Priorities List (NPL) in October 1989. EPA finalized the Site's listing on the NPL in August 1990. To manage the cleanup, EPA divided the site into operable units (OUs). The timeline on page seven provides more information about site activities.

OU-1 is defined as all radiologically contaminated areas of the Site, and includes Area 1, Area 2, the Buffer Zone and Lot 2A2, which is a privately owned commercial property located northwest of Area 2 in the Crossroads Industrial Park. The Buffer Zone is a narrow strip of land located between Area 2 and Lot 2A2 that contains RIM and was purchased by the landfill. EPA issued a Record of Decision (ROD) for OU-1 cleanup in May 2008 that required placing a landfill cap that is compliant with the Uranium Mill Tailings Radiation Control Act (UMTRCA) over OU-1. Based on stakeholder and community concerns, EPA updated the selected remedy in a September 2018 ROD Amendment, which required a partial excavation of RIM at concentrations greater than 52.9 picocuries per gram (pCi/g), off-site disposal of the excavated RIM in a disposal facility permitted for radioactive waste, and an engineered UMTRCA cover over all RIM left on site with concentrations greater than 7.9 pCi/g. In May 2019, EPA entered into an agreement with the potentially responsible parties, or Respondents, for OU-1 (Bridgeton Landfill, LLC, Cotter Corporation N.S.L. and the U.S. Department of Energy) to perform the Remedial Design, which is currently underway. As part of the Remedial Design, the Respondents conducted a Design Investigation to collect additional data needed to design the remedy. The Design Investigation took place from September 2020 to September 2022, during which RIM was identified in the Closed Demolition Landfill and part of the Inactive Sanitary Landfill, an area that had previously been designated as OU-2, or the non-radiologically impacted areas. These newly identified areas with RIM will be incorporated into OU-1 for remedial design purposes.

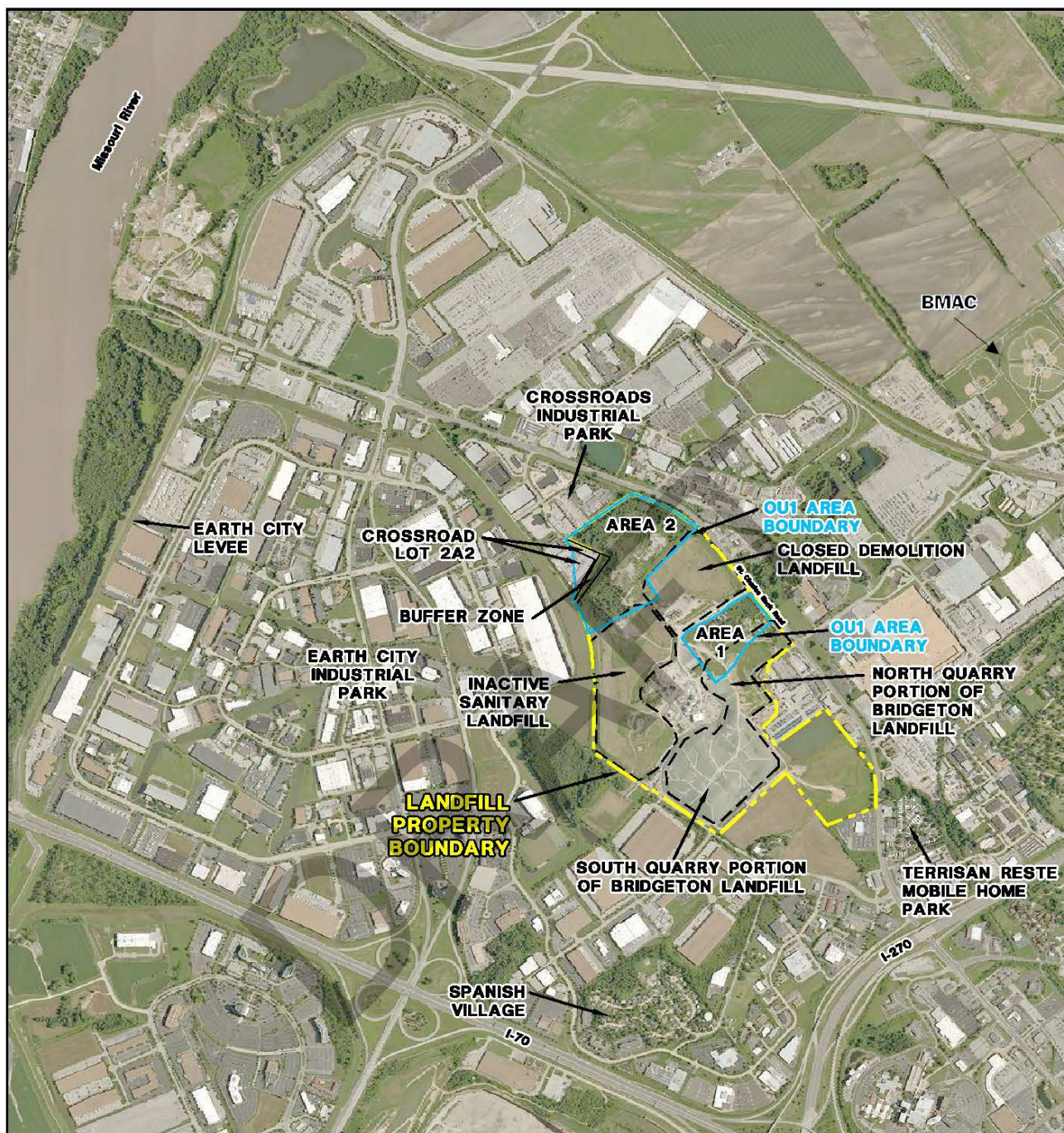
OU-2 is defined as landfilled areas of the Site that are not impacted with RIM and originally included the Closed Demolition Landfill, the Inactive Sanitary Landfill, and the Bridgeton Landfill, which is comprised of the north quarry and the south quarry. After completion of a Remedial Investigation and Feasibility Study (RI/FS), EPA selected the remedy for

OU-2 in a July 2008 ROD. In October 2008, EPA entered into an agreement with the potentially responsible party for OU-2 (Bridgeton Landfill, LLC, site owner and operator) to develop the Remedial Design for the selected remedy but implementation of the Remedial Design phase of the OU-2 remedy was postponed until finalization of the OU-1 ROD Amendment. In early 2019, Bridgeton Landfill, LLC resumed the Remedial Design process for the OU-2 remedy at the Inactive Sanitary Landfill. However, as indicated above, during the OU-1 Design Investigation completed in September 2022, RIM was identified in parts of OU-2. The OU-1 and OU-2 boundaries will be adjusted accordingly.

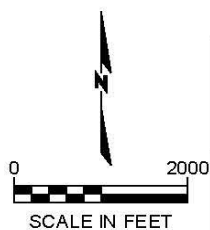
OU-3 includes groundwater beneath the Site. The potentially responsible parties for OU-3 (Bridgeton Landfill, LLC, Cotter Corporation N.S.L. and the U.S. Department of Energy) are conducting the Remedial Investigation for site groundwater to identify and delineate any groundwater contamination associated with the Site. The Remedial Investigation will determine whether a Feasibility Study to select a remedial action is necessary. The Remedial Investigation is being implemented according to the OU-3 RI/FS Work Plan, approved by EPA in October 2020.

Throughout the cleanup process, EPA is committed to involving the public and keeping the community informed about cleanup activities and how these activities may affect them. This CIP has been developed to facilitate two-way dialogue between EPA and the community, and to identify tools that encourage participation throughout the investigations and cleanup. This plan is based on input from local government representatives, residents, community organizations and other stakeholders.

For more information about the Site, including copies of historic and recent documents, site history, work being conducted, site contact information, and other resources, please visit www.epa.gov/superfund/westlakelandfill or contact the site's Community Involvement Coordinator (CIC), Jessica Evans at evans.jessica@epa.gov or 314-296-8182. To view EPA's online dashboard for the Site, please visit www.epa.gov/mo/west-lake-landfill-dashboard.



Source: USGS Aerial Photography



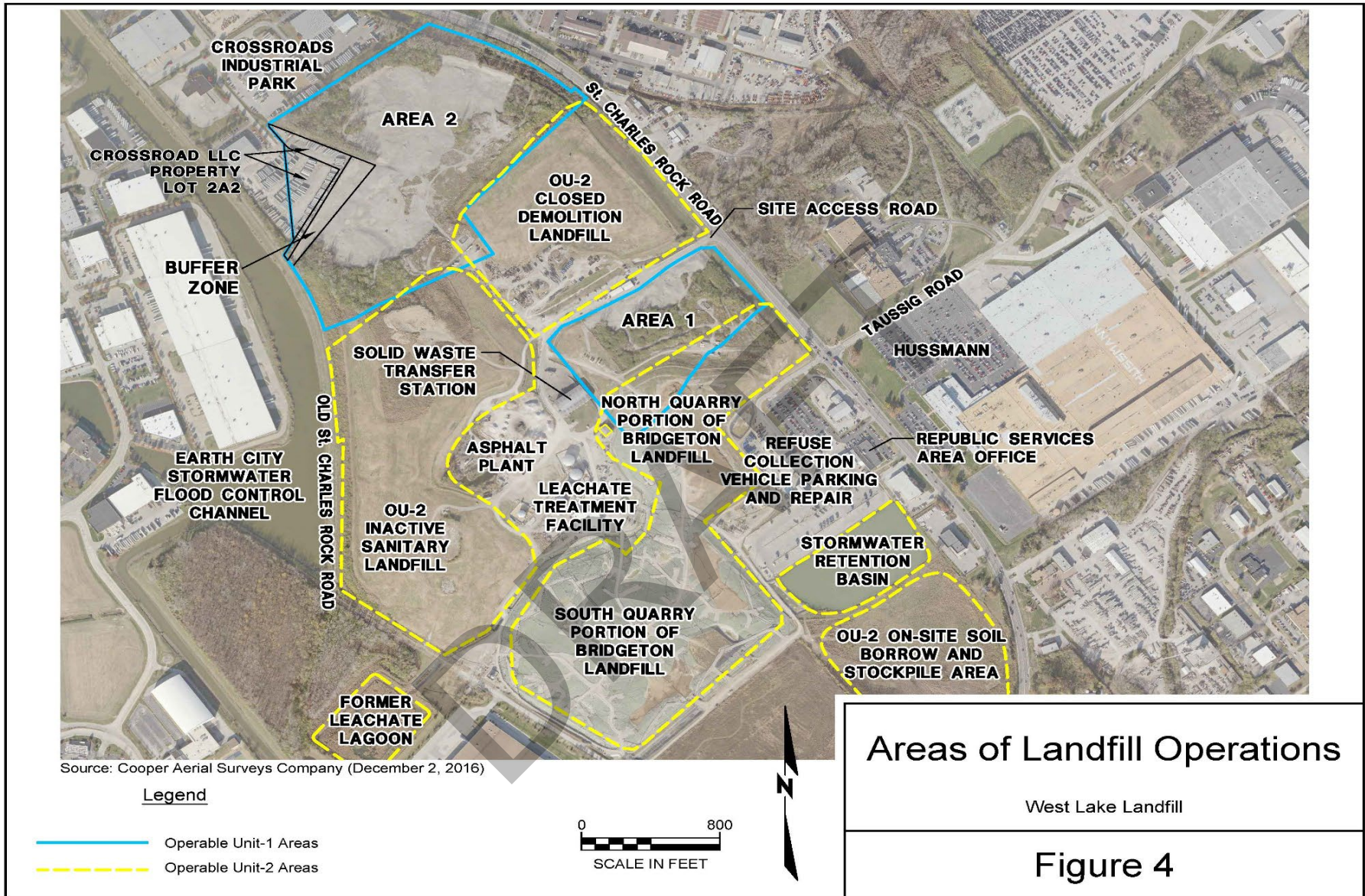
Site Location Map

West Lake Landfill

Figure 2

This figure shows the Site's boundary, the OU-1 boundary and other relevant site features.

Source: The Site's 2018 ROD Amendment for OU-1. Figure number is associated with the source document.



This figure shows areas of historical landfill operations at the Site. *Source:* The Site's 2018 ROD Amendment for OU-1. Figure number is associated with the source document.

Site Timeline

1939 – 1985	Quarrying and crushing operations took place at the Site.
1950s	Landfilling operations began at the Site.
1973	Leached barium sulfate residues were improperly disposed of at the Site.
1974	State regulation and permitting of solid waste landfills began.
1976	State permits were issued to dispose of new waste in the Closed Demolition Landfill and the Inactive Sanitary Landfill.
1977	The U.S. Department of Energy performed an aerial gamma survey of the landfill and identified elevated gamma readings in the areas now known as Area 1 and Area 2.
1979	Bridgeton Landfill began accepting wastes in the North Quarry.
1984	The Closed Demolition Landfill and the Inactive Sanitary Landfill stopped receiving waste under the permits issued in 1976.
1985	Bridgeton Landfill expanded and began accepting wastes in the South Quarry.
1990	EPA added the Site to the Superfund program's National Priorities List.
1993	The potentially responsible parties signed an Administrative Settlement Agreement and Order on Consent to perform the RI/FS for OU-1.
1994	The potentially responsible parties signed an Administrative Settlement Agreement and Order on Consent to perform the remedial investigation and feasibility study for OU-2.
1995	The Nuclear Regulatory Commission deferred regulatory oversight of the Site to the EPA.
2006	Combined remedial investigations and feasibility studies for OU-1 and OU-2 finished.
2008	EPA selected the remedy for OU-1 in a May 2008 ROD. EPA selected the remedy for OU-2 in a July 2008 ROD.
2010	Subsurface smoldering event discovered in the South Quarry of the Bridgeton Landfill.
2011	The potentially responsible parties performed a supplemental feasibility study for OU-1.
2012 – 2013	EPA consulted with the National Remedy Review Board regarding the cleanup of the Site.
2012 – 2014	The U.S. Geological Survey did a site groundwater study.
2013	EPA's Airborne Spectral Photometric Environmental Collection Technology (ASPECT) performed a data-gathering flyover of the Site.
2013 – 2016	The potentially responsible parties completed additional waste characterization investigations.
2014 – present	EPA approved pre-remedial construction work for the Site, including on-site air monitoring.
2015	The potentially responsible parties installed an ethylene vinyl alcohol cover at the South Quarry of the Bridgeton Landfill to reduce odors.
2015 – 2016	The potentially responsible parties installed a non-combustible cover over radiologically impacted material at the surface in OU-1.
2016	The potentially responsible parties installed a heat extraction and monitoring system at the south end of the North Quarry of the Bridgeton Landfill to restrict the subsurface smoldering event from moving into the North Quarry or OU-1.
2017	The potentially responsible parties installed an ethylene vinyl alcohol cover at the North Quarry of the Bridgeton Landfill.
2018	The potentially responsible parties completed a Remedial Investigation Addendum and Final Feasibility Study for OU-1. EPA issued an amendment to the 2008 ROD for OU-1.
2019 – present	The potentially responsible parties entered into legal agreements with EPA to begin the Remedial Design phase for OU-1 and the RI/FS for OU-3.
2020-2022	The potentially responsible parties performed a Remedial Design Investigation to help design the remedy at OU-1.
2022-2023	EPA conducted community interviews and updated the Site's CIP.

THE COMMUNITY

About the Community

The Site is in the city of Bridgeton, Missouri, about 15 miles from St. Louis. Bridgeton is one of the oldest communities in Missouri, having been settled in the 1700s as part of trade/transportation routes used by Native Americans and European traders. It was a French territory and then a Spanish territory until it transferred to American ownership as part of the Louisiana Purchase in 1803. The city incorporated in 1843. Today, it features several historical landmarks, including the Payne-Gentry House, which is listed on the National Park Service's National Register of Historic Places. Bridgeton is a regional transportation hub, with parts of St. Louis Lambert Airport located within city limits. The Bridgeton Berry Hill Golf Course is featured in the Gateway Section of the Professional Golfers Association (PGA).

According to the U.S. Census' 2016-2020 American Community Survey 5-Year Estimates, 4,874 people in 1,744 households live within a 1.5-mile radius of the Site.


Demographic Data Within a 1.5-mile Radius of the Site

One Race	95%
White	64%
Black or African American	20%
Asian	3%
Some Other Race	8%
Two or More Races	5%
Hispanic or Latino (of Any Race)	19%
Population 65 Years and Older	20%
Population with Less Than a High School Degree	14%
Households with Income Base Less Than \$50,000	46%
Renter Occupied Units	55%
Population Speaking a Non-English Language at Home	21%
Population Not in Labor Force	42%



West Lake Landfill Site
Community Involvement Plan &
Technical Assistance Needs Assessment
Public Meeting

Tuesday, March 28th, 2023
6:00 – 8:00 p.m.
Machinists Hall
12365 St. Charles Rock Road
Bridgeton, MO 63044



In July, Aug. and Oct. 2022, EPA conducted interviews with residents and stakeholders gathering information for a Community Involvement Plan (CIP) and Technical Assistance Needs Assessment (TANA) for the West Lake Landfill site. On Tuesday, March 28th, EPA and contractor staff will present the findings of the CIP and TANA along with recommendations for technical assistance. Join us for an opportunity to:

- Ask questions about the CIP and TANA.
- Provide input on the recommendations for community technical assistance support.
- Voice your concerns about the site and/or cleanup to EPA staff.

Preregistration to attend the meeting is encouraged. Preregistration to speak during the final portion of the meeting is strongly encouraged. Please visit the link below, as 2-minute time slots for speaking are limited.

<https://WestLakeLandfill.eventbrite.com>



For more information on the meeting, contact:
Jessica Evans
EPA Community Involvement Coordinator
(314) 296-8182 | evans.jessica@epa.gov
EPA Site Profile Page:
www.epa.gov/superfund/central/landfill

The flyer advertising the community involvement plan meeting.

Past Community Involvement Activities

EPA is committed to engaging the community throughout the Superfund investigation and cleanup process. After the Site's listing on the NPL, EPA hosted its first public meeting for the Site in 2006 to discuss the Proposed Plan for OU-1 and OU-2. In response to city and community requests, EPA extended the public comment period and returned to the community for two more meetings about the Proposed Plan before closing the public comment period and issuing the ROD in 2008. Similar outreach and public comment periods took place for the 2018 OU-1 ROD Amendment. EPA provided support for the formation of a Community Advisory Group (CAG) in 2013. EPA has hosted public meetings or participated in meetings held by the CAG and shared written site updates several times a year since 2014. The community has also received technical advising support and technical assistance from EPA's Technical Assistance Services for Communities (TASC) program. The EPA continued meeting with the Technical CAG, a sub-committee of the CAG, to a limited extent during the COVID-19 restrictions. During the last few years there has been ongoing EPA community outreach via West Lake Update newsletters, weekly Facebook updates during field activities, Technical CAG meetings, quarterly Emergency Response Plan meetings with first responders, and periodic news releases. Additionally, EPA created a West Lake community involvement project manager position in the St. Louis area satellite office to

directly respond to community questions and concerns and holds weekly office hours at Bridgeton City Hall open to community members. There have also been site tours conducted at the landfill with elected officials, community groups, and other stakeholders.

Environmental Justice

Environmental justice 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 7 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 7 also coordinates closely with EPA Headquarters and states to support initiatives that provide all people living near Superfund sites with technical assistance, training opportunities and other services. EPA has a variety of environmental justice resources available for community-based organizations at www.epa.gov/environmentaljustice, including:

1. The [Environmental Justice Collaborative Problem-Solving \(CPS\) 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.
2. The [Environmental Justice Small Grants Program: EPA's 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.

EJScreen

EJScreen is an environmental justice mapping and screening tool. The tool is an approach EPA frequently uses to assess environmental and socioeconomic information for a particular geographic area. EPA looks at these additional factors to gain a better understanding of the baseline exposure risks and concerns within a community resulting from living in this location, apart from any risks associated with a specific site. The analysis looks at 12 environmental indicators that include pollution exposure sources, such as air particulate matter, traffic proximity, and proximity to wastewater discharge, to determine whether these background conditions in the community could potentially have a greater or cumulative impact when combined with site-specific risks. The analysis also looks at 10 socioeconomic indicators, such as education levels, income levels, and employment, so EPA can work to ensure that the community is not being made to bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations or policies.

An EJScreen analysis for a 1.5-mile radius of the Site in 2023 found that nine of the 12 environmental justice indicators were present at levels greater than 80% of the rest of the United States. Community members in this area are exposed to higher ozone and diesel particulate matter concentrations, to higher air toxics cancer risks and air toxics non-cancer respiratory risks, and to greater proximity to traffic, Superfund sites, Risk Management Plan facilities, hazardous waste facilities, underground storage tanks and wastewater discharge facilities than 80% of the country. This means that people in this community may potentially have a higher-than-average impact to their lives from air pollution and potential exposure to nearby waste management facilities. The analysis found one of the 10 socioeconomic indicators, limited English-speaking households at 8%, exceeded the national average of 5%. With a higher-than-average percentage of households with limited English fluency, the community in this area may need additional language support services.

The mapping application can be accessed at <https://ejscreen.epa.gov/mapper/>. Additional EJ Screen information and training resources can be found at <https://www.epa.gov/ejscreen/what-ejscreen> and <https://www.epa.gov/ejscreen/ejscreen-videos>.

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 (DPM)
- 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

Overview of the CIP Process

From July 2022 to October 2022, EPA conducted telephone interviews with local stakeholders, including individuals from the Missouri Coalition for the Environment (MCE), the St. Louis County Department of Public Health, Bridgeton City Council (Ward 2), the Maryland Heights Mayor's Office, the West Lake CAG, Just Moms STL, Terrisan Reste Mobile Home Park, North County Incorporated, Pattonville Fire District, SSM DePaul Hospital, Virbac, the Hussman Corporation and CRAFTCO, Inc. Responses to these interviews informed the Site's technical assistance needs assessment (TANA) and, in turn, the CIP. The following sections summarize the feedback provided to EPA during the community interviews.

Community Issues and Concerns

During the interviews, stakeholders shared their concerns and perspectives about transparency, trust, effective communication and outreach, information sharing, and technical assistance needs. Almost all interviewees had a basic familiarity with the Site and its history. All people interviewed said they wanted more direct engagement with EPA, especially after the COVID-19 public health emergency limited in-person meetings for several years. Many stakeholders said they felt EPA needed to hear from the community about people's questions and concerns, and to provide answers to those questions. Many people shared frustrations about feeling kept in the dark regarding current site activities and findings. They referenced technical documents, presentations and explanations that were not shared in accessible plain language, real or perceived delays to the cleanup process, and uncertainties regarding the cleanup and its impacts on neighboring residents and businesses. Previous interactions with EPA staff have left many members of the community feeling their health and concerns have been ignored. People said that errors and changes to information shared by EPA have resulted in a general wariness and distrust. Stakeholders offered a range of suggestions to EPA for rebuilding trust and strengthening community relationships as well as establishing a better communication network with local officials and first responders. Comments from the interviews fit into four main categories: Information Sharing and Communication, Technical Assistance Needs, Rebuilding Trust, and Outreach. The section below provides a summary for each of these categories.

INFORMATION SHARING AND COMMUNICATION



Interviewees shared concerns about access to site documents, the disappearance of physical documents from the local information repository, perceptions of unequal information sharing, and the need for in-person events to resume after the relaxation of safety protocols related to the COVID-19 public health emergency.

People asked for a minimum of two in-person meetings per year and suggested quarterly updates. These updates should increase in frequency during times of greater activity, such as leading up to a public comment period, prior to mobilization for cleanup work at the Site and during remedial work on Site. People requested a multimedia outreach approach for information sharing. Some people prefer electronic communications. Other people prefer physical paper mailings and in-person events. Other suggestions included establishing alternate information repositories and "common ground" meeting locations as well as making improvements to websites to provide centralized and more accessible information resources.

TECHNICAL ASSISTANCE NEEDS



Interviewees said that the EPA site team and other staff at the Site are often not personable and present technical information that can be difficult to absorb. While EPA is working on improving community relationships and information sharing, several stakeholder groups remain affected by previous interactions with EPA.

People expressed appreciation for a technical advisor provided by EPA in past years who interacted well with the public and shared information in plain language via presentations, fact sheets and document summaries. Several interviewees asked for this support once again, with a new technical advisor serving as an "interpreter" between the community and EPA.

People also asked for more information about the Site, including cleanup timelines, how wastes will be removed safely for off-site disposal, and upcoming work to address groundwater contamination.



Interviewees alluded to previous concerns about how EPA handled testing and site investigations, as well as an error identified in 2022 posted accidentally on EPA's site dashboard. People also talked about an emotional charge in the community resulting from feelings that earlier EPA staff were not responsive to community questions and concerns, condescended, ignored community outreach efforts, and generally acted in an uncaring way regarding the health and safety concerns of people living and working near the Site.

People asked for greater transparency regarding site-related activities and for plain language summaries to accompany technical information shared with the public.

A few interviewees said that a series of smaller, in-person events rather than a single, large public meeting would be more constructive in rebuilding trust and building new relationships with stakeholder groups. People emphasized that, regardless of the type of meeting, it is imperative that EPA share the same information with all stakeholder groups.

Many interviewees asked for a consistent EPA presence in the community, to make EPA feel more accessible and "part" of community efforts.

Interviewees shared concerns that communications are not reaching all community groups that need to be informed about the Site and that these groups need to be offered the opportunity for input into the cleanup process. People expressed concerns that the step-out approach to cleanup has resulted in expanded site boundaries (and known areas of contamination) that include a larger area of impact and a greater number of community members who need to be kept informed. There has been a shift, particularly in the Spanish Village, toward short-term renters who are unfamiliar with the area and history and also need to be kept informed about the Site.

Several people said that the public is not apathetic about the cleanup. Rather, they are not knowledgeable of the Site unless made aware of an immediate concern. One person suggested an annual postcard mailout for all addresses in a certain zip code to remind people (or let them know) that EPA remains involved.

People also said there is a need for better outreach and communication with community leaders and first responders to ensure appropriate preparations and responses, should an emergency arise.

THE COMMUNITY INVOLVEMENT ACTION PLAN

Introduction to the Action Plan

Using information gathered during community interviews, EPA developed this Action Plan to address the community's needs, concerns, questions and expectations as well as local communication styles and preferences.

Ongoing Communication

EPA will continue to work with Missouri Department of Natural Resources (MoDNR), the MCE, the St. Louis County Department of Public Health, St Louis County Office of Emergency Management, Missouri Department of Health and Senior Services, Bridgeton City Council, Local elected officials, the Earth City Business Community, Just Moms STL, the West Lake CAG, Emergency Responders, and other community organizations and community members to ensure that site information and important updates are shared directly with the public.

To sign up for the site email or mailing list, please contact
EPA community involvement coordinator (CIC), Jessica Evans at evans.jessica@epa.gov or 314-296-8182

Community Involvement Tools and Activities

EPA has identified and developed a variety of tools and activities to better engage with and involve the community.

Site Profile Page and Online Dashboard

EPA will continue to maintain the West Lake Site Profile Page. For past, current and future updates, please visit www.epa.gov/superfund/westlakelandfill. To view EPA's online dashboard for the Site, please visit www.epa.gov/mo/west-lake-landfill-dashboard.

The webpage:

1. Shares an overview and history of the Site and EPA's involvement.
2. Provides updated information about the Superfund cleanup process to the public. New information is featured under Stay Updated, Get Involved (Announcements and Key Topics section).
3. Shares site-related reports and documents with the public as they become available. There is a link to the document section under the Site Documents and Data section of the webpage.

The dashboard:

1. Includes an interactive mapping application and site progress dashboard for OU-1.
2. Communicates site progress and provides updated data results.
3. Provides transparency into the Superfund and Remedial Design process.

Periodic Updates, Fact Sheets and Educational Materials

To help address community concerns about the Site, EPA staff will provide site updates and site information in plain language, in both print and electronic formats. EPA will collect, prepare and share documents to help people better understand site conditions and the cleanup. Updates will be shared regularly. Updates, fact sheets and materials may be shared by email, targeted physical mailings and site webpage postings. Information materials will include contact information to enable direct access to EPA staff. When appropriate, EPA will provide key site updates in a format that can be shared easily by community members and stakeholders via social media.

EPA-hosted Events

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 Americans with Disabilities Act (ADA)-accessible and in the Bridgeton community. Examples of area facilities include the Bridgeton Recreation Center, Bridgeton City Hall, Bridgeton Trails Branch Library, and Machinists Hall. Interviewees indicated an overall preference for meetings to be scheduled in the evening (after work hours) on Tuesday or Thursday evenings.

Community Meetings

Based on availability, EPA staff will attend meetings held by community groups, local government and other organizations upon request to share information about the Site and to address community questions, concerns, ideas and comments. To identify appropriate opportunities and venues to deliver information about the Site, EPA will work with the community to coordinate the meetings. EPA may attend these meetings in person or virtually, in coordination with the community.

Briefings with Local Officials

EPA staff have attended Technical CAG meetings with stakeholders, local officials and elected office holders to provide briefings about the Site and respond to questions and concerns. Upon request, EPA staff will attend more meetings to provide updates about site work and cleanup progress.

Mailing List

EPA will continue to maintain and update the Site electronic mailing list. The list has been developed based on past meeting sign-in sheets, community interviews, and email and telephone inquiries. EPA has also developed a mailing list of residences and business located within 1.5 miles of the site. To be added to the mailing list, please send a request by email or telephone to EPA's CIC Jessica Evans at evans.jessica@epa.gov.

Translations

EPA may provide written information about the Site in English and other languages as needed. Language interpretation, including American Sign Language, will be provided as requested and coordinated with EPA's CIC.



Pattonville Fire Protection District Headquarters in Bridgeton.

Formal Public Comment Periods

At specific points during the Superfund process, EPA announces and opens public comment periods and encourages people to share their questions, concerns, and feedback. EPA accepts formal comments on several types of documents, including 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. The community will be notified of public comment periods by public notice in local papers, EPA site webpage updates, and email and mailing notifications sent to the community list. EPA will also work with local officials, the West Lake CAG and community groups to help spread the word. At this time and in accordance with CERCLA regulations, EPA does not anticipate any formal public comment periods during the Remedial Design or Remedial Action phases of work for OU-1 and OU-2 but will continue to provide information and answer questions for the public as indicated in sections above. A formal public comment period will be held for the OU-3 Proposed Plan after completion of the Remedial Investigation and Feasibility Study process.

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.

Community Technical Assistance Resources

EPA provides additional assistance to communities through a variety of technical assistance resources. These resources include the Technical Assistance Grant (TAG) program, the TASC program and CAG formation support.

In 2013, EPA supported the formation of a CAG for the Site. The West Lake CAG can review and comment on any technical documents and plans related to the environmental studies and cleanup activities at the Site to better serve the surrounding community. The West Lake CAG is also intended to relay information between EPA and the community regarding ongoing investigation and cleanup activities at the Site.

	TAG	TASC	CAG Formation Support
Overview of Program/Support	<ul style="list-style-type: none"> • Awards grants to eligible community groups affected by 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. 	<ul style="list-style-type: none"> • Provides technical information assistance services through a national EPA contract. Services are provided at no cost to communities. • Suitable for communities with short- and long-term needs. 	<ul style="list-style-type: none"> • CAGs provide a forum for community discussion of site-related issues and include representatives of diverse community perspectives. • EPA can help with CAG formation.
Services	<ul style="list-style-type: none"> • Review and explanations of site technical documents and information. • Comments on technical documents. 	<ul style="list-style-type: none"> • 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 education materials for communities. • Assistance understanding the environmental decision-making process. • Language translations. 	<ul style="list-style-type: none"> • Informational meeting about CAGs. • Assistance in determining CAG size and membership. • Training for CAG members. • Administrative support and translation and meeting facilitation services.

Meeting information is available on EPA's site webpage (under the Stay Updated, Get Involved section) at cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.Stayup&id=0701039#Stayup.

For more information on these resources, please see below and visit www.epa.gov/superfund/superfund-technical-assistance-communities.



Information Repository

EPA maintains site information and reference materials for the public to read online on the Site Profile Page and the Westlake Landfill Dashboard. Anyone needing assistance with accessing the internet or finding specific information can also contact EPA's West Lake CIC, Jessica Evans at evans.jessica@epa.gov or 314-296-8182.

People who need internet access to view these documents can visit:

Bridgeton Trails Branch
St. Louis County Library
3455 McKelvey Road
Bridgeton, MO 63044
(314) 994-3300

Site information can also be accessed at:

U.S. EPA Region 7 Record Center
11201 Renner Boulevard
Lenexa, KS 66219
Toll-Free: 1-800-223-0425
Hours: Monday to Friday, 8:00 a.m. to 5:00 p.m.

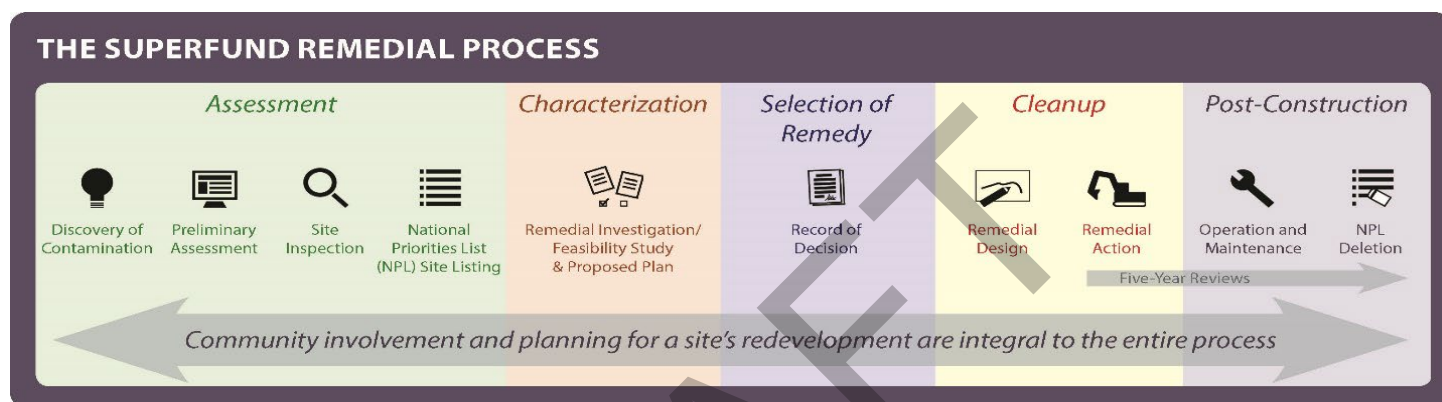
Many of these documents are also available through EPA's site webpage at www.epa.gov/superfund/westlakelandfill.

DRAFT

APPENDICES

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 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 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 part of a site (sometimes called an OU) from the NPL if all cleanup goals have been met and no further cleanup action is required to protect human health and the environment.

Key Contacts

EPA Contacts

U.S. EPA Region 7 Contacts

11201 Renner Boulevard
Lenexa, KS 66219

Jessica Evans

EPA Community Involvement Coordinator
(314) 296-8182
evans.jessica@epa.gov

Chris Jump

EPA Remedial Project Manager
(913) 551-7141
jump.chris@epa.gov

Site Partner Contacts

Missouri Department of Natural Resources

Federal Facilities Section
Environmental Remediation Program
PO Box 176
Jefferson City, MO 65102

Ryan Seabaugh

State Project Manager
(573) 751-8628
ryan.seabaugh@dnr.mo.gov

Elected Officials

1. U.S. House of Representatives. Visit www.house.gov/representatives/find-your-representative for contact information for your congressional representative. The Site is in Missouri's 1st congressional district.
2. U.S. Senate. Visit www.senate.gov/senators for contact information for the U.S. senators for Missouri.
3. State House/Assembly. Visit www.house.mo.gov for contact information for your state house representative. The Site is in Missouri's 1st congressional district.
4. State Senate. Visit www.senate.mo.gov for contact information for your senator. The Site is in Missouri's 14th senatorial district.

Local Media Outlets

EPA may provide updates and information to local newspapers and radio and television stations and ask them to report on site-related issues. EPA staff will be available for interviews and will respond to media inquiries in a timely fashion. Inquiries from the news media should be directed to Ben Washburn at washburn.ben@epa.gov or 913-551-7364.

EPA may publish public notices about meetings and other events in local newspapers and send notices to other local news outlets. EPA may include the following media outlets as part of outreach and information delivery efforts.

Newspapers

St. Louis Post-Dispatch
Attn: News Director
901 North Tucker Boulevard
St. Louis, MO 63101
(314) 340-8000 (phone)
(314) 340-3050 (fax)

Associated Press (AP)
Attn: News Director
200 Liberty Street
New York, NY 10281
(212) 621-1500 (phone)
info@ap.org (email)

St. Louis American
Attn: News Director
2315 Pine Street
St. Louis, MO 63103
(314) 533-8000 (phone)

St. Louis Argus
Attn: News Director
4595 Dr. Martin L. King Drive
St. Louis, MO 63113
(314) 531-1323 (phone)

Television

Fox 2 – KTVI-TV
Attn: News Director
2250 Ball Drive
St. Louis, MO 63146
(314) 213-2222 (phone)

NBC 5 – KSDK-TV
Attn: News Director
1000 Market Street
St. Louis, MO 63101
(314) 421-5055

CBS 4 – KMOV-TV
Attn: News Director
One Memorial Drive
St. Louis, MO 63102
(314) 621-4444 (phone)
(314) 444-6307 (fax)
news@kmov.com (email)

ABC 9 – KDNL TV-30
Attn: News Director
1034 South Brentwood, Suite 1910
Richmond Heights, MO 63117
(314) 436-3030 (phone)

KPLR 11
Attn: News Director
2250 Ball Drive
St. Louis, MO 63146
(314) 213-2222 (phone)

Radio stations

CBS – KMOX – 1120 News Radio
Attn: News Director
1220 Olive Street, 3rd Floor
St. Louis, MO 63103
(314) 621-2345 (phone)
(314) 588-1234 (fax)
kmoxnews@kmox.com (email)

KTRS
Attn: News Director
638 West Port Plaza
St. Louis, MO 63146
(314) 453-5500 (phone)
(314) 453-559704 (fax)

NPR – KWMU
Attn: News Director
3651 Olive Street
St. Louis, MO 63108
(314) 516-5968 (phone)
hello@stlpr.org (email)

Additional Resources

EPA Community Technical Assistance Resources

EPA provides additional assistance to communities through a variety of technical assistance resources. These resources include the TAG program and the TASC program. The West Lake CAG and broader community have received technical advising support and technical assistance from the TASC program. For more information on these resources, please visit www.epa.gov/superfund/superfund-technical-assistance-communities.

Other EPA Resources

1. National Superfund program: www.epa.gov/superfund.
2. EPA Region 7: www.epa.gov/aboutepa/epa-region-7-midwest.
3. Superfund Community Involvement: www.epa.gov/superfund/superfund-community-involvement.
4. Superfund Redevelopment: www.epa.gov/superfund-redevelopment.
5. Superfund Community Involvement Tools and Practices: <https://semspub.epa.gov/work/HQ/100002232.pdf>.

Resources of other Organizations

1. Missouri Department of Natural Resources: dnr.mo.gov/waste-recycling/sites-regulated-facilities/federal/west-lake-landfill.
2. Just Moms STL West Lake Landfill: www.stlradwastelegacy.com/.

Community Involvement Plan Community/Stakeholder Interview Questionnaire

EPA used the following questions when conducting community interviews about the Site. People's responses to these questions informed the Community Issues and Concerns section of this CIP.

History

1. How long have you lived/worked in this area?
2. Are you familiar with the West Lake Landfill Superfund site? If so, what has been your involvement at the site (for example, nearby resident, attended past meetings)?
3. What are your concerns/the community's concerns about the site? Please explain.

Community Outreach

4. Are you currently receiving information about the site? If so, from where and how are you receiving this information? Do you have suggestions to improve how information is disseminated to you?
5. Do you feel that you have been kept adequately informed? If not, what can be done to change this?
6. What is the best way for EPA to provide more information about the cleanup?
 - a. Fact sheets (two-to-four pages on a specific topic or site)
 - b. Public meeting
 - c. Open house
 - d. EPA presentation at an established community group's meeting
 - e. Website
 - f. Hard-copy announcements
 - g. Email announcements
 - h. Social media (please specify Facebook, Twitter, Instagram or other social media)
 - i. Other

7. What should EPA consider when developing outreach materials for the community (for example, translation into different languages, electronic versus paper copies, plain language text)?
8. How often should information be provided?
9. What newspaper(s)/radio stations/TV stations/websites do you prefer for local information and news?
10. Have you attended any community meetings regarding the cleanup activities?
 - a. If no, is there a reason why you have not attended?
 - b. If yes, how effective do you feel these community meetings have been? Do you have suggestions on how to improve them?
11. In your opinion, what days of the week (and times) are best for community meetings?
12. Are there local civic groups, service clubs or environmental organizations that EPA should contact to provide information to or speak with?
13. Are you aware of the site's information repositories online at EPA's site webpage and the West Lake Landfill Dashboard? (If you don't have internet access, you can view these documents online at the Bridgeton Trails Branch of the St. Louis County Library, located at 3455 McKelvey Road in Bridgeton, MO 63044 | 314-994-3300.)
 - a. Is the online repository convenient for the community?

Technical Assistance

14. Has the community been receiving enough information from EPA about the site? Has this information been clear and easy to understand?
15. What site information does the community need help understanding? What type of assistance do you believe would be most helpful (for example, technical advisor review of technical documents, plain language workshops, fact sheets, in-person or virtual presentations, translations)?
16. Are there particular community members or stakeholders affected by the site who may need additional assistance understanding site information?

Feedback

17. How would you describe the community's relationship with EPA?
18. Do you have confidence that EPA will do a good job cleaning up the site?
 - a. Why? Why not?
 - b. If not, how can EPA gain your confidence?

Wrap-up Questions

19. Can you suggest any other individuals or groups that should be contacted for additional information or to be added to the mailing list?
20. Is there anything else you would like to share with us to help improve cleanup and community involvement activities at the site?

Acronyms and Abbreviations

ASPECT	Airborne Spectral Photometric Environmental Collection Technology	CAG	Community Advisory Group
CERCLA	Comprehensive Environmental Response and Liability Act	CIC	Community Involvement Coordinator
CIP	Community Involvement Plan	CPS	Collaborative Problem-Solving
DPM	Diesel Particulate Matter	EPA	Environmental Protection Agency
HRS	Hazard Ranking System	MCE	Missouri Coalition for the Environment
MoDNR	Missouri Department of Natural Resources	NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List	OU	Operable Unit
pCi/g	Picocuries per Gram	PGA	Professional Golfers Association
RI/FS	Remedial Investigation and Feasibility Study	ROD	Record of Decision
SARA	Superfund Amendment and Reauthorization Act of 1986	TAG	Technical Assistance Grant
TANA	Technical Assistance Needs Assessment	TASC	Technical Assistance Services for Communities
UMTRCA	Uranium Mill Tailings Radiation Control Act		

WEST LAKE LANDFILL SUPERFUND SITE COMMUNITY INVOLVEMENT PLAN

March 2023

www.epa.gov/superfund/westlakelandfill

