

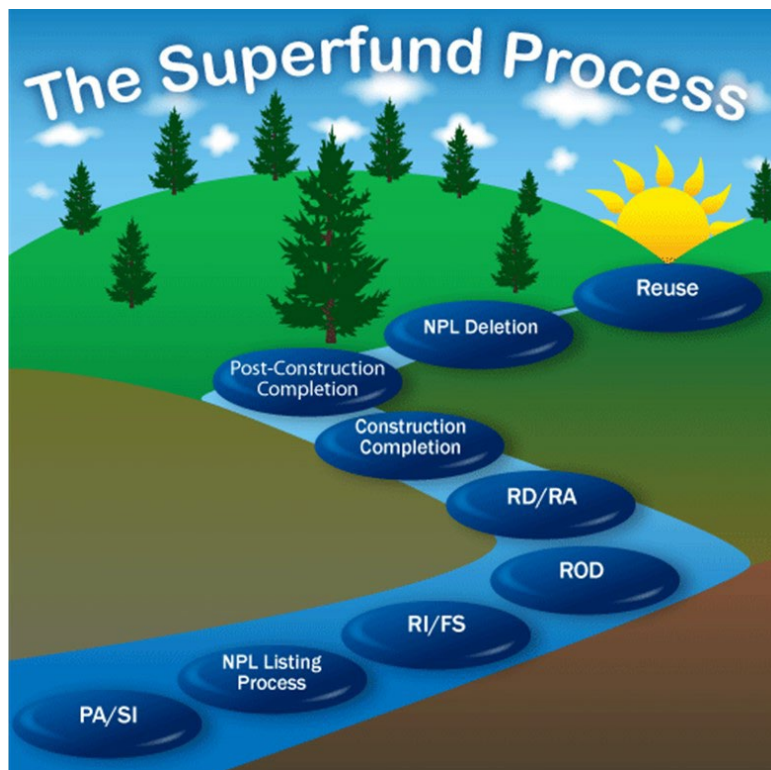
# CHAPTER 3

## Superfund Site Team and Collaboration

### 3.1 Superfund Site Team

The composition of the Superfund site team varies depending on the type of response and the complexity of the site. Site team members may include (but are not limited to) RPMs, OSCs, site assessment managers (SAM), geologists, toxicologists/risk assessors, CICs, environmental justice coordinators, public affairs staff (including press officers), site attorneys and other enforcement staff, and relevant state, territorial or tribal representatives. The composition of a Superfund site team may vary over time due to the specific needs of each phase of the cleanup process<sup>24</sup> (Figure 3-1). For example, the initial CERCLA process involves identifying and assessing sites that would require SAM expertise, and a site undergoing remedial investigation may require various technical experts to design and implement sampling programs such as quality assurance specialists and sampling design experts. As that same site moves into construction, it may be important to add team members with construction oversight and construction health and safety expertise to the team.

Figure 3-1. The Superfund Process



<sup>24</sup> <https://www.epa.gov/superfund/superfund-cleanup-process>.

When the site is large and cleanup is expected to last years, the program may want to consider having multiple CICs or locating a full-time CIC at the site, if feasible. The roles of the CIC are to plan, coordinate, and conduct community involvement activities and to be accessible to the public to provide information and answer questions concerning site activities. Community involvement activities include working with internal team members and external partners to vet consistent messaging, developing written and online materials, establishing a social media presence, regularly updating the project webpage, designing public meetings and workshops, and more. The CIC should be intimately familiar with all activities at the site and should advise the rest of the site team on community information and local knowledge that may impact decisions, as well as on appropriate communications and outreach to the community.

Additionally, at residential Superfund sites where lead is a risk driver and there may be multiple sources of lead, it is important that Superfund site teams work in a collaborative manner with communities. This can be achieved by ensuring that there is a regional EPA employee (or employees) who acts as a Convener. The Convener ensures that the site team is coordinating with other EPA programs and other agencies (*e.g.*, federal, state, etc.) to identify and address sources of lead beyond releases being addressed under CERCLA authority and communicating consistent community goals and messages. Close coordination among EPA programs and other agencies is critically important at these complex sites and EPA staff can oftentimes act in a convener role to help communities at Superfund sites to leverage all available resources that might benefit them (U.S. EPA 2020a). Community Involvement is discussed further in Chapter 4.

There may be many site- and Region-specific factors to consider when determining whether EPA should fill a convener role. Due to the nature of the convener role, it may be helpful to take advantage of regional employees already in cross-cutting positions in the Region to draw on their skillsets, established network of connections, and extensive coordination responsibilities already built into their role (such as a Children's Health Coordinator or Lead Policy Coordinator, if available). This would allow those conveners in this type of position to draw upon and leverage those relationships to reach across programmatic siloes. In other cases, the RPM, OSC, or CIC may have already established collaborative relationships and may comprehensively understand Superfund site needs, as well as other programmatic capabilities, and would therefore be best suited for the role of convener. Assigning more than one convener, or co-conveners, may enable them to draw on their expertise. Multiple conveners or co-conveners could be comprised of different variations of expertise such as the following:

- Multiple RPMs/OSCs/CICs

- RPM or OSC or CIC and Children’s Health Coordinator
- Management-level staff and RPM

The variation would depend on site- and Region-specific resources and circumstances. The work of collaborating across EPA offices and across federal, tribal, state, and local lines may benefit from the assignment of co-conveners to help mix knowledge bases, skillsets, and networks of contacts to help balance the work of conveners and the Superfund site team. In some cases, a Region may find that capitalizing on the experience of a convener (or co-conveners) to work on multiple residential lead Superfund sites in the Region allows them to streamline coordination efforts, establish relationships more consistently, and make quicker connections with partners for newly identified collaboration efforts and new Superfund sites. Regardless of an individual’s or group’s capacity or experience, acknowledgement of the workload involved in convening as well as management and team support is integral to developing meaningful outcomes of the convener role.

### **3.2 Collaborative Approach to Addressing Lead at Superfund Sites**

There may be Superfund sites where children may be at increased risk due to cumulative impacts from lead, such as the aggregate exposure to multiple sources of lead contamination present in their community. However, as discussed previously, there are limitations under CERCLA to address some of these sources, such as LBP or corrosion of lead plumbing, because CERCLA responses are generally limited to releases or threatened releases to the environment from products that are part of the structure of, and result in exposure within, residential buildings or business or community structures (U.S. EPA 1993). Superfund, however, can promote addressing these non-CERCLA sources through actions by others as a component of an overall site management strategy, particularly at urban sites. Success is dependent on effective and structured coordination and collaboration at the federal, state, tribal, and local level to address lead holistically at Superfund sites.

As recommended in the *Clarification to the 1994 Revised Interim Soil Lead (Pb) Guidance for CERCLA Sites and RCRA Corrective Action Facilities* (U.S. EPA 1998) and *Updated Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities* (Breen 2024), EPA Regions should coordinate with these other authorities to design a comprehensive, cost-effective response strategy that addresses as many sources of lead as practicable. These strategies should include actions to respond to LBP, interior dust, and lead plumbing, as well as groundwater sources and lead-contaminated soil (see Sections 6.7.1 and 6.8.1) (U.S. EPA 1998). Coordination should also involve incorporating information on best practices to reduce lead

exposure to residents at lead-contaminated sites at a federal, tribal, and/or state or local government level.

### Regional Lead Coordination Committee

Within each Region, there is a Staff Lead Coordinating Committee or Regional Lead Action Plan work group (the title may differ across regions) coordinating efforts to protect children from lead exposure by working with other federal, state, and local government agencies, tribes, and community groups by combining Federal authorities, programs, projects, and resources. The Staff Lead Committee consists of representatives from all divisions who coordinate to provide updates on lead programs, share opportunities for collaboration, and monitor regional progress, and can be an important avenue for collaboration.

As identified above, assigning a regional EPA employee (or employees) to act as a convener to bring the necessary parties together for collaboration across authorities with other EPA programs, other federal agencies, and/or state, local, and tribal entities can support this collaborative approach. Later sections of this Handbook identify actions

that the Superfund RPM, OSC, and/or Superfund site team can take within CERCLA authority to identify and address sources of lead beyond the CERCLA release, and situations when collaboration and integration of partners with other authorities into the project team may be beneficial or necessary.

#### 3.2.1 Collaboration for Health Education

There are numerous tools and resources available through other EPA Programs, other agencies, and organizations at the federal, tribal, state, and local levels. By collaborating with these entities, Superfund site teams may be able to help local stakeholders identify non-Superfund opportunities for addressing other sources of lead (*e.g.*, grants from other EPA programs and/or federal agencies).

Other steps to take to support health education may include (not an exhaustive list):

- Coordinate with community members, Community Advisory Groups (CAGs), and other agencies, including local and state health departments, to determine the best way to support health education at your site.
- Develop outreach materials that inform residents about both Superfund-related and non-Superfund-related efforts to reduce and prevent lead exposure. Outreach materials can include information about EPA sampling and cleanup efforts, how to get blood lead

testing, and/or steps for preventing exposure to lead from sources beyond the scope of the site (e.g., lead paint, lead in drinking water from service lines and/or residential plumbing).

- Consider developing joint presentations at community meetings to inform residents about both Superfund-related and non-Superfund-related efforts to reduce and prevent lead exposure.
- Collaborate with EPA’s lead paint program to provide Renovation, Repair, and Painting (RRP) training in the community and/or additional education and outreach on lead paint safety.<sup>25</sup>
- Coordinate with the Agency for Toxic Substances and Disease Registry (ATSDR) or a local or state health department to host a Soil Screening, Health, Outreach, and Partnership (soilSHOP; see more information on working with ATSDR in Section 5.3 and more information about hosting a soilSHOP in Section 4.4). ATSDR has used soilSHOPS co-hosted with EPA to identify potential areas needing further assessment outside the Superfund boundaries. Community members are offered free soil lead screenings to raise awareness of potential lead in their soil, information on safe gardening practices, ways to protect children from lead exposure, and one-on-one health education about the hazards of lead.<sup>26</sup> The health education piece of a soilSHOP provides valuable information. Participants may wish to seek further laboratory testing to confirm their soil screening results. If a resident is within the Superfund cleanup area, they are directed to the Superfund site team for a full assessment.

Additionally, when lands in Indian country are impacted, the Superfund site team may refer to *Tribal Lead Curriculum: Lead Awareness in Indian Country: Keeping our Children Healthy!* for curriculum and outreach materials<sup>27</sup> (U.S. EPA 2023b). Additionally, where tribal interests may be affected, EPA must follow the Agency’s *Tribal Consultation Policy*,<sup>28</sup> *Guidance for Discussing Tribal Treaty or Similar Rights*,<sup>29</sup> and any Region-specific tribal consultation guidance. The Superfund site team should work with the regional Superfund tribal coordinator to ensure appropriate tribal consultation and coordination.<sup>30</sup>

### 3.2.2 Collaboration for Sharing Blood Lead Monitoring Results

In addition to collaboration for health education, collaboration between state Departments of Health and EPA is also important. State Departments of Health can provide EPA with annual

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<sup>25</sup> <https://www.epa.gov/lead/lead-renovation-repair-and-painting-program>.

<sup>26</sup> <https://www.atsdr.cdc.gov/soilshop/index.html>.

<sup>27</sup> <https://www.epa.gov/lead/tribal-lead-curriculum>.

<sup>28</sup> <https://www.epa.gov/tribal/epa-policy-consultation-indian-tribes>.

<sup>29</sup> [https://www.epa.gov/system/files/documents/2023-12/revisions-to-the-consultation-policy-and-tribal-treaty-or-similar-rights-guidance-fact-sheet\\_0.pdf](https://www.epa.gov/system/files/documents/2023-12/revisions-to-the-consultation-policy-and-tribal-treaty-or-similar-rights-guidance-fact-sheet_0.pdf).

<sup>30</sup> <https://www.epa.gov/superfund/remedial-program-indian-country#contacts>.

statistics on blood concentrations of young children in the community from opportunistic monitoring without violating Health Insurance Portability and Accountability Act (HIPAA) Privacy Rules. Children with BLLs above U.S. Centers for Disease Control and Prevention (CDC) reference values should follow CDC guidance (*e.g.*, to identify and reduce or eliminate the source of contamination leading to elevated blood lead concentrations). Once the source of elevated blood lead has been identified, EPA can work collaboratively with other state and federal partners to address the source of lead contamination.