United States
Environmental Protection
Agency

COMMUNITY INVOLVEMENT PLAN

FOR THE

SOUTHEAST GRAND RAPIDS SITE

GRAND RAPIDS, MICHIGAN
OCTOBER 2016

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INTRODUCTION

In 1980, the United States Congress enacted the **Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)**, also called **Superfund**. CERCLA authorizes the U.S. Environmental Protection Agency to investigate and respond to **hazardous substance** releases that may endanger public health and the environment. Congress amended and reauthorized the Superfund law in October 1986 as the **Superfund Amendments and Reauthorization Act**. If the site poses an immediate threat to public health or the environment, EPA can intervene with an **emergency response action**.

EPA prepared this **Community Involvement Plan** to inform, engage and support the **community** affected by the Southeast Grand Rapids site located in Grand Rapids, Michigan. Our **community involvement** effort is committed to promoting effective and meaningful communication between the **public** and the Agency. We want to make sure the community's current concerns and information needs are considered as activities at the site progress.

This **CIP** describes EPA's plan for addressing concerns and keeping residents informed and involved in investigation and **cleanup** activities at the site. We will use this document as a guide to involve and communicate with residents, businesses and community organizations. We used several information sources to develop this plan, including research and discussions with the public.

EPA's community outreach objectives:

- Assist the public in understanding the decision-making process during the investigation and cleanup and the community's role in that process.
- Give the public accessible, accurate, timely and understandable information about the project as it moves forward.
- Reflect, respect and fully consider community concerns, questions, public input and information needs.

If you are interested in submitting comments or have questions or suggestions concerning this CIP, please contact:

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(*Words in **bold** are defined in Appendix A.*)

SITE LOCATION

The Southeast Grand Rapids site is in a small neighborhood located in southeast Grand Rapids, Michigan. The investigation area is bounded to the north by Umatilla Street Southeast, and residential properties beyond; to the east by a mixed commercial/multi-family apartment building and residential properties beyond; to the south by Hall Street Southeast and properties beyond; and to the west by Euclid Avenue Southeast. Below is a map of EPA's current study boundaries.

SITE BACKGROUND

A dry cleaner formerly located at 415 Hall SE released frequently used, but hazardous materials called **tetrachloroethylene** (**PCE**) and **trichloroethylene** (**TCE**) into the ground during its operation, which ended in 1995. These chemicals are also known as **volatile organic compounds** or **VOC's**. Because of their chemical makeup, VOC's can evaporate into the air even in low temperatures and are prone to cause an environmental problem called **vapor intrusion**. The unsafe gases can come from the polluted soil and contaminated **groundwater** below the surface. These vapors seep, or intrude, into homes and other buildings through structural cracks. PCE and TCE can cause health issues such as headaches and dizziness. Long-term exposure to these chemicals may cause cancer.

On May 19, 2016, the Michigan Department of Health and Human Services requested EPA's assistance at the Southeast Grand Rapids site when high levels of PCE were detected in the indoor air at four properties, two residential and two commercial. These properties were determined to be unsafe for occupancy by the health department and prompted the evacuation of six residents and workers of two non-profit organizations at two physically connected buildings on Madison Southeast and Hall Southeast. Residents and businesses in a newer building at the

former drycleaner site are protected from fumes by a vapor barrier that was installed over the contaminated soil before the new structure was built on the site.

After the local health department requested EPA's assistance for an emergency response, depressurization systems were installed in the two connected structures with confirmed indoor air pollution. The depressurization systems are designed to lower vapor levels under and around the buildings by using fans and piping to capture the vapors underneath the buildings and around the foundations. The vapors are then safely dispersed into the air outside and above the roof lines. EPA contractors sealed the floors and walls of the basements in those buildings to keep the fumes from re-entering.

EPA also began an investigation of the neighborhood in the surrounding area, shown on the map above, to find out if other properties were in danger of being exposed to the vapors evaporating from contaminated underground water. This area encompasses 130 parcels. To date, EPA testing has identified six additional properties that needed vapor abatement systems. EPA installed all of those systems, and follow-up air testing shows the air is safe. EPA has continued outreach efforts to properties that are at high risk of **contamination**, to encourage property owners and occupants to allow us to sample. EPA will refine the target area, and resample high-risk properties this winter to ensure the indoor air remains safe.

EPA also evaluated indoor air in six properties that had vapor abatement systems installed when the properties were redeveloped (prior to EPA's involvement). One of the vapor abatement systems was not working, and indoor air was contaminated. EPA upgraded this system, and follow-up air testing shows the property is safe.

Finally, EPA is working to design a system to treat the contamination in the ground and groundwater at the former dry cleaner site, with the goal of eventually stopping the spread of pollution into the neighborhood.

COMMUNITY INVOLVEMENT GOALS AND ACTIVITIES

When establishing the objectives for a site-specific community involvement program, we consider several factors, including federal requirements and EPA policies that assess the nature and extent of known or perceived site **contaminants,** as well as known community concerns and requests.

To be effective, our community involvement program is designed to meet the community's need to know, give information in a timely manner, and accommodate the community's interests and its willingness to participate in decision-making processes. We must also share information in language the public can understand.

To meet the needs of the community, respond to information obtained and meet federal requirements, we have established the following objectives for our community involvement efforts:

- Enlist the support, coordination and involvement of local officials and community leaders.
- Enlist the support, coordination and involvement of the Michigan Department of Health and Human Services, the Michigan Department of Environmental Quality, the city of Grand Rapids and Kent County.
- Monitor citizen interest in the site and respond accordingly.
- Keep the community well-informed of ongoing and planned site activities.
- Explain technical site activities and findings in an understandable format for residents.
- Get public input on key decisions.
- Change planned activities, where warranted, based on community input.
- Update EPA's website regularly and provide useful information on it for the community.
- Update city and state officials on a periodic basis even if no activities are occurring at the site.
- Hold **public meetings**, when necessary, within the community to give all residents an opportunity to attend.

EPA has or will put in place the activities described on the following pages to meaningfully and actively engage the community in decisions regarding the investigation and cleanup of the Southeast Grand Rapids site. The following plan is intended as opportunities for communication between the community and EPA and to address key concerns and questions raised during public outreach.

Specific Community Involvement Activities

To meet federal requirements and to address community concerns and questions described in the Community Concerns section, EPA has conducted (or will conduct) the activities described below. Through these activities, it is our goal to inform, involve and engage the community during site cleanup decisions and efforts. As the needs of the community change, we will modify the community involvement strategies to answer them.

- Maintain point of contact: Ruth Muhtsun is the EPA Community Involvement Coordinator and fields general questions for the site. EPA's **On-Scene Coordinator,** or **OSC,** for the site is Betsy Nightingale who serves as the project manager and another point of contact for community members about the site. Rachel Bassler is the public affairs coordinator for the site, organizing media involvement.
- We will include current contact information for the project staff on all written and electronic information and will notify the community of any contact information changes.

COMMUNITY PROFILE

Past data has shown underprivileged, minority populations tend to reside in communities where sources of environmental hazards are likely to be located. The neighborhood where the Southeast Grand Rapids site is located is made up of a low-income, minority population. EPA views this area as a sensitive population and will apply its **Environmental Justice** strategy during the cleanup. Environmental Justice is an Executive Order that ensures federal agencies identify and manage environmental hazards in a fair way that includes meaningful **community engagement**. Environmental Justice does not affect how EPA will handle cleanup from a technical standpoint,

but it will be a major consideration for how EPA interacts with the public. This includes making sure EPA's messaging is understandable and distributed in a way that will reach the affected community. It also dictates for example, when and where EPA holds its public meetings, and which local organizations to work with during public outreach.

CHRONOLOGY OF COMMUNITY INVOLVEMENT

May 20, 2016 – Canvased surrounding neighborhood and passed out 175 flyers inviting the community to a public meeting. Also coordinated with local community groups about the public meeting and requested they distribute meeting information to their networks. EPA also set up a Command Post, located at 1170 Madison SE.

May 25, 2016 – EPA held a public meeting to provide information on the source of contamination and EPA's emergency response as well as the evacuation of several buildings at the source area. EPA toxicologist and an Agency national vapor intrusion team expert also attended the meeting.

May 26, 2016-July 15, 2016 – EPA provided daily project updates and sampling results to the city, county, state and federal officials involved in the project.

May 27, 2016 – Attended meeting with the coordinator of Seeds of Promise, one of the organizations that was evacuated by the local health department.

May 31, 2016 – EPA met with representatives from several community organizations to discuss community needs and outreach strategies. EPA also met with city administrators and county officials about the response. EPA fact sheets about the response in both English and Spanish were created and distributed along with letters requesting access for sampling to non-resident (off site) owners of properties in the vapor intrusion sampling target area. These outreach materials were shared with local community groups and on EPA's public web page: https://www.epa.gov/mi/grand-rapids-vapor-intrusion. EPA staff also conducted numerous media interviews.

May 31, 2016 - Present – EPA began extensive door-to-door outreach to obtain access agreements in the impacted area. Full time for about four weeks, and continuing to this day, EPA and START contractors visit homes to discuss contamination, sampling and cleanup plans with residents. For residents found not home, information packets with EPA fact sheets and contact information are left for them. EPA also reaches out to property owners to obtain access for sampling and cleanup.

June 6, 2016 – EPA contacted Grand Rapids Public Schools to offer response and assessment work with students, per recommendation of community outreach groups and the county to see if any students at the schools live in homes in our initial vapor intrusion target area.

June 7 and 14, 2016 – EPA held open office hours at LINC UP, a local community organization.

June 16-17, 2016 – Reached out to eight area churches requesting an announcement for people living in the target area to contact EPA to schedule sampling.

June 9, 2016 – EPA held an open house from 4-7 p.m. in the parking lot of the EPA Command Post, located at 1170 Madison SE. Published a media advisory and tweet prior to event to promote attendance.

June 11, 2016 – EPA attended the "Rock the Block Party," an annual street fair held in the neighborhood. EPA set up a booth with fact sheets, access agreements, and displayed sampling equipment. The goal of EPA's attendance was to inform residents of the cleanup and obtain access agreements.

June 13 – 25, 2016 – EPA's national vapor intrusion experts mobilized to the site the week of June 13 to vapor sample at properties that have granted access. A specially equipped EPA bus containing laboratory equipment and accompanied by chemists parked in the area the week of June 20 to provide immediate testing results.

June 14, 2016 – EPA prepared outreach material for and attended LINC Town Hall Meeting. Social service needs were identified in the event that any future evacuations would be necessary.

June 21, 2016 – Held Media Day, which gave the media the opportunity to tour the TAGA bus. Issued a press release prior to the event to promote attendance.

June 21, 2016 and each Tuesday thereafter through July 5, 2016 – EPA held office hours at the EPA trailer from 4 p.m. to 7 p.m. Compiled a list of stakeholder email addresses from outreach efforts and emailed office hour reminders each week.

July 5, 2016 – EPA met with a LINC community outreach coordinator regarding continuing outreach efforts.

July 7, 2016 – Updated project fact sheet and posted updated version to the project website.

July 7, 2016 – EPA briefed the Red Project staff at their meeting on the work done on the evacuated buildings.

July 12, 2016 – The city verified that no drinking water wells are in use in an expanded area to the west of Division and south of Hall as a precaution.

July 15, 2016 - present – EPA is providing daily project updates and sampling results to the city, county, state and federal officials involved in the project.

July 18, 2016 – The Kent County Health Department lifted the public health order prohibiting occupancy at the buildings on Hall Southeast and Madison Southeast. The building is now reoccupied.

July 21, 2016 – EPA attended a LINC community work group meeting via telephone.

July 26, 2016 – EPA began mailing out letters to owners and occupants with final indoor air sampling results.

August 8, 2016 – Completed project update interview with Grand Rapids Business Journal.

September 9-15, 2016 – EPA identified 15 additional properties that appear to be at very high risk for vapor intrusion, but owners declined access for sampling during previous outreach. Because existing data suggests these homes may have high levels of contamination, EPA is continuing outreach to these properties with some success.

COMMUNITY CONCERNS

EPA has not conducted formal community interviews to date. However, many concerns and issues were presented during canvassing and meetings with community organizations. Below are some of the most frequently raised topics.

Human Health

The biggest concern shared by the community is the risk that site contaminants pose to human health. There were numerous questions regarding the effects of exposure, symptoms and treatment if exposed to pollution. Also, while explaining the process of vapor intrusion, many residents were concerned their drinking water may be polluted as well. It has been clarified among the community that the underground water that has been contaminated is not the same as the drinking water supplied by their municipality. EPA also took precautions to ensure there was no exposure to contaminated groundwater after learning from the city's Water Department that hook-up to municipal water is optional. Together with the Kent County Health Department, EPA confirmed that no buildings in the study area were using water not serviced by the city.

Practical Communication

Several community members recommended EPA use more simplified language when communicating with the residents living in the southeast neighborhood. Representatives commented that correspondence and literature was often too long and technical. This sort of communication can be frustrating for residents or create a lack of interest for EPA's messages. In response to these comments, EPA developed a postcard format handout, and distributed that instead of a letter. EPA also encouraged residents to come to availability sessions or the site trailer for any questions or comments.

Displacement

Many community members were under the impression that evacuation of the buildings at the corner of Hall and Madison was an EPA directive and were worried that they would be evacuated from their homes as well. There were also questions regarding where residents would stay during cleanup, or live if the relocation was permanent. When encountering these questions, EPA representatives advised the evacuations were not EPA's decision but the County Health Department's. The County Health Department also developed a plan to assist other individuals who were removed from their home or work. Residents were advised if high levels of contamination were found in their homes, evacuation was not expected to be necessary. Fortunately, no other evacuations have been required.

Property Values

Another issue raised by the southeast Grand Rapids community was property values. This is an area of concern typically addressed at cleanup sites. However, at this site the concern is that EPA is cleaning the neighborhood for an unspecified, impending gentrification project. EPA assured residents and community leaders the Agency's only mission is to make the area safe for human health and the environment. It was also emphasized to the public the cleanup of this site is a "time-critical, emergency response," meaning EPA is determined to eliminate the imminent health threats.

Lack of Trust

Numerous residents in the area expressed distrust of the DEQ stemming from the seemingly overdue response time. According to residents, commercial businesses such as the former dry cleaner and a former gas station have been in the neighborhood for quite some time. Residents were not able to understand why DEQ did not respond sooner if knowledge of these companies was previously known.

EPA's Urgency for Sampling

EPA responded to this site immediately upon being notified by the state of environmental problems. Although most resident were welcoming and cooperative, the question of why this was designated a "time-critical" response after such a long time came up on numerous occasions during canvassing. It was explained to the community that although local and state agencies may have been working on the issue for some time, there was only a short time lapse between EPA's awareness and the Agency's response. Additionally, the urgency was necessary because breathing PCE in indoor air, at the levels that were seen at this site, can produce serious health effects within two weeks.

Confusion about EPA's Authority

Many community members expressed confusion about where EPA can or cannot cleanup. There were misunderstandings regarding the extent of EPA's authority in regards to response time to the contamination, as well as the boundaries of EPA's investigation area. Outreach materials, including maps, fact sheets, postcards, and the website were used to assist in communication of these messages.

Cost of Cleanup

Residents expressed concern over who is responsible for paying for the investigation, cleanup, and a permanent solution for the people affected by the contamination. Residents and owners were especially worried about any damages that may occur during sampling. As part of the vapor intrusion study, residents and owners were advised that drilling in the basement is needed to test for soil gas underneath structures. Both owners and residents were advised and shown visual aids that damage to their property was minimal, and all damage costs and repairs would not be their responsibility.

APPENDIX A
GLOSSARY – INITIALS –ACRONYMS

CERCLA. See Comprehensive Environmental Response, Compensation and Liability Act.

CIC. See Community Involvement Coordinator.

CIP. See Community Involvement Plan.

Cleanup. Actions taken to deal with a release or threat of release of a hazardous substance that could affect humans and/or the environment. The term "cleanup" is sometimes used interchangeably with the terms "remedial action," "remediation," "removal action," "response action," or "corrective action."

Community. An interacting population of various types of individuals in a common location; a neighborhood or specific area where people live.

Community Engagement. The process of involving communities in all phases of the cleanup process. Communities are asked to provide input on how the cleanup will be conducted and how it may affect community plans and goals. See also Community Involvement.

Community Involvement. The term used by EPA to identify its process for engaging in dialogue and collaboration with communities affected by Superfund site. EPA's community involvement approach is founded in the belief that people have a right to know what the Agency is doing in their community and to have a say in it. Its purpose is to give people the opportunity to become involved in the Agency's activities and to help shape the decisions that are made.

Community Involvement Coordinator. The EPA official whose lead responsibility is to involve and inform the public about the Superfund process and response actions in accordance with the interactive community involvement requirements set forth in the National Oil and Hazardous Substances Pollution Contingency Plan.

Community Involvement Plan. A plan that outlines specific community involvement activities that occur during the investigation and cleanup at the site. The CIP outlines how EPA will keep the public informed of work at the site and the ways in which residents can review and comment on decisions that may affect the final actions at the site. The document is available in the site's information repository maintained by EPA. The CIP may be modified as necessary to respond to changes in community concerns, information needs and activities.

Comprehensive Environmental Response, Compensation, and Liability Act. A federal law passed in 1980 and modified in 1986 by the Superfund Amendments and Reauthorization Act. Commonly known as Superfund, CERCLA is intended to protect people's health and the environment by investigating and cleaning up abandoned or uncontrolled hazardous waste sites. Under the program, EPA can either:

- Pay for site cleanup when parties responsible for the contamination cannot be located or are unwilling or unable to do the work; or
- Take legal action to force parties responsible for site contamination to clean up the site or pay back the federal government for the cost of the cleanup.

Contaminant(s). Any physical, chemical, biological or radiological substance or matter that has an adverse effect on air, water or soil.

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. Also applies to surfaces of objects, buildings and various household use products.

Emergency Response Action. Refers to a short-term cleanup conducted by EPA to prevent, minimize, or mitigate immediate threats to human health and the environment.

Environmental Justice. An Executive Order issued by President Clinton that requires federal agencies to ensure 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. Fair treatment means no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.

Groundwater. Underground supplies of fresh water.

Hazardous Substance(s). Any material that poses a threat to human health and the environment. Typical hazardous substances are toxic, corrosive, ignitable, explosive or chemically reactive. Any substance designated by EPA to be reported if a designated quantity of the substance is spilled in the waters of the United States or is otherwise released into the environment.

Hazardous Waste. Byproducts that can pose a substantial or potential hazard to human health or the environment when improperly managed. Hazardous wastes usually possess at least one of four characteristics (ignitability, corrosivity, reactivity or toxicity) or appear on special EPA lists.

Plume. A plume is a visible or measurable discharge of a contaminant from a given point of origin. It can be visible or thermal in water, or visible in the air as, for example, a plume of smoke.

OSC. See On-Scene Coordinator

On-Scene Coordinator. Federal officials responsible for monitoring or directing responses to all oil spills and hazardous substance releases reported to the federal government. OSCs coordinate all federal efforts and provide support and information to local, state and regional responders.

Public Meeting. Formal public sessions that are characterized by a presentation to the public followed by a question-and-answer session. Formal public meetings may involve the use of a

court reporter and the issuance of transcripts. Formal public meetings are required only for the proposed plan and Record of Decision amendments.

Public. The community or people in general or a part or section of the community grouped because of a common interest or activity.

Superfund Amendments and Reauthorization Act. Modifications to the Comprehensive Environmental Response, Compensation and Liability Act, enacted on Oct. 17, 1986.

Superfund. The program operated under the legislative authority of CERCLA that funds and carries out EPA solid waste emergency and long-term removal and remedial activities. These activities include establishing the National Priorities List, investigating sites for inclusion on the list, determining their priority and conducting and supervising cleanup and other remedial actions.

TCE. See Trichloroethylene.

Trichloroethylene. A chemical that is used as a solvent to remove oils and grease from metal products and is found in adhesives, paint removers, typewriter correction fluids and spot removers. TCE is colorless liquid with an odor similar to ether and is a manufactured substance that does not occur naturally in the environment. It minimally dissolves in water and can remain in groundwater for a long time. TCE evaporates from surface water and soil, although it evaporates less easily from soil. Exposure from TCE is most commonly through breathing air that has TCE vapors, drinking or showering in contaminated water, or direct contact with contaminated soil. Long-term exposure to this family of chemicals is suspected of causing cancer, as well as problems of the liver and weakening of the immune system. More information can be found in the fact sheet in Appendix F on the following website: www.atsdr.cdc.gov/toxfaqs/tfacts19.pdf.

Tetrachloroethylene. A chemical that is widely used for dry cleaning of fabrics and for metal-degreasing. It is also used to make other chemicals and is used in some consumer products. Other names for include perchloroethylene (PERC), PCE, and tetrachloroethene. Much of the tetrachloroethylene that gets into water or soil evaporates into the air. High concentrations of tetrachloroethylene (particularly in closed, poorly ventilated areas) can cause dizziness, headache, sleepiness, confusion, nausea, difficulty in speaking and walking, unconsciousness, and death. Irritation may result from repeated or extended skin contact with it. These symptoms occur almost entirely in work (or hobby) environments when people have been accidentally exposed to high concentrations or have intentionally used tetrachloroethylene to get a "high." More information can be found in the fact sheet in Appendix F on the following website: www.atsdr.cdc.gov/toxfaqs/tfacts18.pdf

Vapor Intrusion. Occurs when underground pollutants release chemical vapors that travel up through the soil and accumulate beneath building foundations. Air in the building becomes polluted when vapors enter through cracks or holes in foundations and crawl spaces.

VOCs. See Volatile Organic Compounds.

Volatile Organic Compounds. A type of organic compound that tends to change from a liquid to a gas at low temperatures when exposed to air. As a result of this tendency, VOCs disappear more rapidly from surface water than from groundwater. Since groundwater does not come into contact with air, VOCs are not easily released and can remain in groundwater that is being used for drinking water, posing a threat to human health. Some VOCs are believed to cause cancer in humans.