

## **For Regional Superfund Site Teams**

### **CERCLA Interim Guidance on Public Engagement During COVID-19**

As of 4/28/20

As we navigate our way through this unique time, the health and safety of our staff, contractors, and the communities we serve is our top priority. Below is interim guidance for conducting Superfund community involvement work at sites during the COVID-19 pandemic. This interim guidance is developed in accordance with current guidance from the Centers for Disease Control (CDC) and other local, state, tribal and federal health advice. In addition to the program covered by this document, there are also examples of required public engagement activities in the RCRA program (e.g., permitting, corrective action, subtitle D rulemaking) that we are evaluating in order to determine the most appropriate alternatives.

OSRTI's Technology Innovation and Field Services Division (TIFSD) offers webinar training for site teams on how to use virtual meeting technologies. The webinars will be announced in a separate e-mail.

We are also working with the Conflict Prevention and Resolution Center to update the 2017 **EPA Long Distance Engagement Guidebook: Developed for Community Involvement Coordinators** which provides useful strategies for keeping communities informed using virtual technologies and other communication options. We will send the updated guidance to the regions as soon as it's available.

Even as we encourage the use of technology for virtual meetings and communications, staff should keep in mind that not all individuals have access to such technology or that some individuals may have only limited access, especially during this time of social distancing. For example, libraries that serve as information repositories or that provide a method of internet access may be closed.

Thank you for your patience and flexibility as we work to find ways to support your work. We will update this information as we learn more.

#### **Interim Guidance**

- It is recommended that Superfund site teams cancel or postpone in-person public meeting events, door-to-door visits, and other site-related face to face interactions. This recommendation is made to be consistent with current [COVID-19 guidance from the CDC](#) and other federal, state, tribal and local officials (e.g., gatherings of more than ten people at a time are discouraged, and social distancing should be practiced where possible).
- We fully encourage EPA staff to keep in contact with your affected communities using other communication channels such as fact sheets, postcards, phone, social media, etc., and virtual tools such as on-line meetings, webinars, conference calls, call-in numbers, etc.

- It is recommended that Regions update their Site Profile Pages within 48 hours of making a decision to significantly change site operations or plans. The update should include:
  - A message on the landing page that informs the community of what is changing and what is not, and who to contact with any questions or concerns.
  - Language stating that the change in work is a temporary measure as we adjust to the ongoing situation with COVID-19, and that we will be periodically reassessing the decision moving forward and are prepared to come back to the site to continue work as soon as possible.
- For public meetings required by statute under CERCLA and as discussed in the NCP, Regions may use virtual public meeting tools until guidance from the CDC and relevant local, state, tribal and federal health officials changes. See memorandum Virtual Public Hearings and Meetings at [https://www.epa.gov/sites/production/files/2020-04/documents/ogc\\_virtual\\_hearing\\_memo\\_4-16-2020.pdf](https://www.epa.gov/sites/production/files/2020-04/documents/ogc_virtual_hearing_memo_4-16-2020.pdf).
- Before using a virtual meeting tool, please ensure meetings are properly planned to promote access to the technology and to the necessary agency documents (e.g., Administrative Record File) to the extent practicable. Regions should also take steps to ensure, as practicable, that participants can follow the substance of the discussions, even if they lack full access to the technology and/or agency documents.

## Tools and Resources

- The 2017 **EPA Long Distance Engagement Guidebook: Developed for Community Involvement Coordinators**. This Agency-wide guidance discusses alternative approaches and tools you may want to consider using during this time for purposes of maintaining communications with your communities, consistent with current CDC guidance. The guidance is currently being updated. For more information, please contact Tina Conley at (703) 603-0696 or at [conley.tina@epa.gov](mailto:conley.tina@epa.gov).