

SECTION 7 FUTURE PUBLIC INVOLVEMENT PLANS

The public involvement activities implemented since August 1999 have both maintained and improved CSSA's existing relations with the community. Public participation in the corrective action process is required to begin upon completion of the RFI and CMS. The RFI is still active at CSSA, and the CMS has not been initiated. Details of the RCRA Corrective Action Process and the associated documents required by the USEPA can be found in Appendix A.

To comply with the Order, and foster effective communication between CSSA and the community, interviews with community members were held in August 1999, April through June 2002, and May 2005. Discussions with state and local officials, well owners whose wells were sampled by CSSA, and interested citizens identified the public information needs, as well as the most effective method for disseminating this information. Input from the community provides information that maximizes efforts and provides effective management of the CRP. In addition, information gathered during the 2005 interviews regarding the best way to continue providing information to the community should be evaluated.

Based on information gathered in the original CRP and updates, four objectives were developed for the CRP at CSSA:

- Provide the community with timely and accurate information;
- Establish and maintain two-way communication between CSSA and the community;
- Respond to specific community concerns and needs that arise for environmental activities; and
- Provide opportunities for citizen input and involvement.

These objectives guide the overall community relations activities. Past activities conducted to ensure the community is properly informed were discussed in Section 5 and in previous CRPs. The following paragraphs discuss future activities designed to ensure these four objectives are met:

7.1 PROVIDE THE COMMUNITY WITH INFORMATION

7.1.2 Administrative Record/Information Repository

The Environmental Encyclopedia Administrative Record will continue to be updated and maintained at the main branch of the San Antonio Library, 600 Soledad Plaza, San Antonio, TX 78205. Updated information will be added to the Administrative Record on a quarterly basis.

7.1.3 Newsletters/Fact Sheets

Information releases in the form of fact sheets will be prepared on an annual basis. The most up-to-date mailing list will be used for each Fact Sheet. Fact Sheets will be prepared to report the results of each groundwater monitoring event. Future Fact Sheets may be considered for concerns about noise levels near CSSA, the Long-Term Monitoring Optimization (LTMO) plan for groundwater, or site cleanup and removal actions. All information releases or Fact Sheets should include the name, address, and telephone number of a CSSA representative responsible for inquiries about the CSSA environmental program.

7.1.4 Mailing List

The mailing list will continue to be updated for forwarded addresses or returned items following each informational mail out. In addition, the mailing list will include media representatives, city and county officials, state and federal agencies with jurisdiction over wildlife resources, and key regulatory agency officials. Newspaper notices can be used to invite people to be added to the mailing list so they can receive any public notices or other information disseminated during the corrective action process.

7.1.5 Contact Person

The CSSA contact person is Mr. Jason D. Shirley, Installation Manager. The PAO from Fort Sam Houston, Mr. Phil Reidinger, supports Mr. Shirley by responding to inquiries from the public.

7.1.6 Statement of Basis

A Statement of Basis (SB) will be prepared which summarizes the information contained in the RFI and CMS reports. The SB is designed to facilitate public participation in the remedy selection. The SB will be placed in the administrative record so it is available for public review and comment, upon completion of the RFI reports and the CMS report.

7.1.7 Public Notice

A public notice will be issued after the CMS has been completed and a clean-up alternative is proposed. A notice and brief analysis of the SB will be published, and appropriate documents will be made available to the public for review at the local information repository. Sufficient information will be included in the notice and analysis to provide a reasonable explanation of the proposed remedy and a list of the remedial alternatives analyzed during the CMS (refer to Table 7.1 for an outline). The notice and analysis will be published, at a minimum, in a major local newspaper of general circulation in both Spanish and English. The notification will also be sent to facility mailing list recipients. Appendix D, Media Contacts, lists local newspapers intended to carry all public notices.

Table 7.1 Newspaper Notification Content Summary

The newspaper notification should include the following:
<ul style="list-style-type: none"> • <i>Facility name and location</i>
<ul style="list-style-type: none"> • <i>Date and location of public meeting</i> (if scheduled) - If a meeting has not been requested or scheduled, the notice will inform the public of its right to request one.
<ul style="list-style-type: none"> • <i>Public participation</i> - The notice will inform the public of its role in the remediation selection process and provide the following information: <ol style="list-style-type: none"> 1. Location of the information repositories and administrative record 2. Methods by which the public may submit comments 3. The dates of the public comment period
<ul style="list-style-type: none"> • <i>Identification of a proposed remedy</i>
<ul style="list-style-type: none"> • <i>Alternative remedies evaluated in the CMS</i>
<ul style="list-style-type: none"> • <i>Request for public comments</i> - The notice will emphasize that the agency is soliciting public comment on ALL of the corrective measure alternatives, as well as on the proposed remedy. It will include a clear statement that the proposed remedy is only a preliminary determination and that other options could be selected as the remedy based upon public comment, new information, or a reevaluation of existing information.

7.2 ESTABLISH TWO-WAY COMMUNICATION BETWEEN CSSA AND THE COMMUNITY

As part of its CRP, CSSA will continue to conduct public meetings if the public continues to indicate that these meetings are helpful. CSSA will host future meetings in subsequent years based on community interest. These meetings will follow the format of the meetings held in October 2001 and 2002, with CSSA’s environmental contractors technical staff presenting displays of information describing CSSA’s environmental program. Representatives from the USEPA, TCEQ, Edwards Aquifer Authority, Bexar Metropolitan Water District, San Antonio Metropolitan Health District, and other entities involved in the environmental program at CSSA will be invited to participate in the public meetings. CSSA currently plans to hold a public meeting in the fall of 2006.

7.3 RESPOND TO COMMUNITY CONCERNS AND NEEDS THAT ARISE FOR ENVIRONMENTAL ACTIVITIES

CSSA will continue to respond to concerns and questions from citizens or groups, to the need for environmental activities such as GAC filtration units, under the guidelines of the Off-post Groundwater Monitoring Response Plan, LTMO Plan, and the data quality objectives for the Groundwater Monitoring Program. The CSSA contact point for the community, Mr. Shirley, will continue to be identified in all newsletters and Fact Sheets. Any change in contact person, as may be affected by any future change in post command, will be noted on subsequent mailouts. Each question or comment will receive a telephone response or written response, if requested, in a timely manner. Based on comments made by local residents during interviews, two additional off-post wells should be considered for sampling as requested by the well owners.

7.4 PROVIDE FOR CITIZEN INPUT AND INVOLVEMENT

7.4.1 Hold Public Meetings

CSSA plans to hold a public meeting in 2006 to facilitate two-way discussions between regulators and the community. The public meeting will present recent investigation results from clean-up activities at SWMU B-3. Another topic of the next public meeting will be changes in on-post monitoring frequencies resulting from the LTMO study. CSSA plans to explain how the study was conducted and how decisions were made. In addition to the quarterly mailings, a public meeting will be held every 2 years to facilitate community participation in the CSSA environmental program, if deemed necessary. These meetings will be advertised in the local newspapers, and through invitation to community members on the CSSA mailing list. Meetings are not recorded for the public record.

7.4.2 Public Comment Period

A public comment period is a designated time period in which citizens can formally review and comment on the proposed course of action or decision in response to CMS or CMI work plan. A public comment period is required before corrective measures can be implemented. Upon publication of the SB for CSSA, a public comment period will be held to allow comment on the proposed remedy.

7.4.3 Response to Comments/Responsiveness Summary

A response to comments (RTC) identifies changes to the SB and the reasons for the changes. It also briefly describes and responds to all significant comments received during the public comment period. The RTCs are written in a clear and understandable style so it is easy for the community to understand how public comments were considered. Following the public comment period for the SB, a responsiveness summary will be compiled which lists all comments received and the responses to each.