

EPA Region 7 Did Not Effectively Engage with the Community Surrounding the Findett Corp. Superfund Site

Why We Did This Evaluation

To accomplish this objective:

The U.S. Environmental Protection Agency Office of Inspector General conducted this evaluation to determine whether the EPA adhered to federal laws, regulations, and EPA guidance pertaining to community engagement standards and practices at the Findett Corp. Superfund Site. Contamination of the groundwater at the Findett Corp. Superfund Site and the EPA's response to that contamination has long been an issue of concern in the St. Charles, Missouri community.

We initiated this evaluation based on an OIG <u>inquiry</u> into the EPA's response to contamination of the drinking water source in St. Charles, Missouri.

To support these EPA missionrelated efforts:

- Ensuring clean and safe water.
- Partnering with states and other stakeholders.
- Operating efficiently and effectively.

To address these top EPA management challenges:

- Integrating and leading environmental justice.
- Maximizing compliance with environmental laws and regulations.

Address inquiries to our public affairs office at (202) 566-2391 or OIG.PublicAffairs@epa.gov.

List of OIG reports.

What We Found

EPA Region 7 did not effectively engage with the community affected by the Findett Corp. Superfund Site. The region's public-facing documents and presentations were too technical for the public to easily understand. The region also distributed information in newspapers with low circulation to reduce costs. As a result, members of the St. Charles, Missouri community, which is near the Findett Corp. Superfund Site, were unaware of opportunities for public participation and confused about the cleanup process. Further, after the discovery of an additional source of contamination, Region 7 did not promptly develop a new or updated community involvement plan for St. Charles. The 2021 plan that the region ultimately developed did not reflect changing site conditions or have the benefit of robust and diverse community feedback.

In addition, Region 7 did not effectively facilitate community involvement by providing timely technical assistance or other tools to the St. Charles community. It also did not use available mediation services in a timely manner to mitigate the contentious relationships among the Findett Corp. Superfund Site stakeholders. EPA guidance encourages staff to use these techniques to prevent, mitigate, and resolve environmental conflicts. Instead, Region 7 staff, the City of St. Charles, and the potentially responsible party, which is the party responsible for contamination at a site, engaged in months of worsening conflict. This conflict delayed the region's cleanup activities, including water sampling and the development of a water-pumping strategy. Region 7 and the city disagreed about the risks from the groundwater contamination, resulting in conflicting public messages and confusion among St. Charles residents. Had Region 7 used the EPA's available tools to enhance community involvement and stakeholder engagement at the Findett Corp. Superfund Site earlier, it may have minimized site cleanup delays and mitigated the community's mistrust in the EPA.

Without effective community engagement, the public may not know about remediation activities, and groundwater contamination cleanup may not occur in a timely manner.

Recommendations and Planned Agency Corrective Actions

We recommend that the regional administrator for Region 7 (1) assess the need for alternative dispute resolution services at the Findett Corp. Superfund Site, (2) implement a plan to regularly train Superfund staff on community involvement and plain language resources, (3) develop procedures to help Superfund site teams identify community needs for supplemental technical support, (4) establish regular opportunities for community involvement coordinators to better understand and provide recommendations on site and community activities, and (5) implement procedures for updating community involvement plans as site conditions change. The EPA agreed with all recommendations and provided corrective actions with estimated completion dates. Recommendation 1 was completed. Planned corrective actions for Recommendations 2 and 3 meet the intent of our recommendations, and these recommendations are resolved with corrective actions pending. Recommendations 4 and 5 remain unresolved.