



COMMONWEALTH of VIRGINIA

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October 20, 2014

Mr. Michael Liberati
DuPont Corporate Remediation Group
Chestnut Run Plaza 715-236
Wilmington, DE 19805
VIA ELECTRONIC MAIL

**Re: Community Involvement Plan for AOC 4
Former DuPont Waynesboro Plant, Waynesboro, Virginia
EPA ID# VAD003114832**

Dear Mr. Liberati:

The Department of Environmental Quality, Office of Remediation Programs (the Department) received the Revised Community Involvement Plan and response to comments on September 15, 2014. This plan is dated September 2014 and is associated with the former DuPont Waynesboro Plant located in Waynesboro, Virginia.

The Department has reviewed the revised plan along with the response to comments and approves it as part of the facilities Site-Wide Corrective Action Program.

If you have any questions, you may contact me at 804-698-4064 or by email at Vincent.Maiden@deq.virginia.gov.

Sincerely,

A handwritten signature in blue ink that reads 'Vincent Maiden'.

Vincent A. Maiden
Office of Remediation Programs

cc: Jutta Schneider, Pat McMurray, Sonal Iyer, Angela Alonso, Bill Hayden, File – DEQ CO
Andrea Barbieri, EPA Region III (3LC50)
Graham Simmerman, Don Kain – DEQ VRO

**COMMUNITY INVOLVEMENT PLAN FOR AOC 4
SOUTH RIVER AND A SEGMENT OF THE
SOUTH FORK SHENANDOAH RIVER
WAYNESBORO, VIRGINIA**

Issued: September 2014



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Table 1 Current and Proposed Tools and Activities vs. Community Involvement Categories

FIGURE

Figure 1 Elements of Community Involvement Plan for AOC 4

ATTACHMENT

Appendix A Draft Remediation Advisory Panel Charter

1.0 INTRODUCTION

Between 1929 and 1950, mercury was used in a manufacturing process at the DuPont facility in Waynesboro, Virginia. Much of the mercury was recycled and reused, but quantities were lost with some entering the South River. Upon discovery of mercury in the river system in the 1970s, fish were found to have mercury levels exceeding those considered safe for human consumption. The Virginia Department of Health (VDH) issued a fish consumption ban for the South River and South Fork Shenandoah River in 1977. This ban was changed to a consumption advisory in 1980. Consumption advisories remain in place for approximately 25 miles of the South River and greater than 100 miles of the South Fork Shenandoah River.

Mercury in fish in these rivers has been investigated since its discovery. The South River Science Team (SRST) was formed in 2001 to serve as a focal point for technical issues concerning mercury in the South River and downstream waterways. Since that time, numerous SRST studies have been conducted to characterize the distribution of mercury in the watershed and identify potential options to decrease mercury availability to aquatic and terrestrial organisms. Study results indicate that, the primary source of mercury to the river is the erosion of mercury-impacted riverbank soil.

In October 2013, DuPont developed a Remediation Proposal outlining the remedial strategy for the aquatic portion of the South River and a portion of the South Fork Shenandoah River (Anchor QEA, et al., 2013). The first phase of remedial efforts will be completed as an interim measure (Phase 1 IM) under the existing Hazardous Waste Permit for Corrective Action Permit for the facility. The Phase 1 IM efforts will stabilize riverbanks that continue to contribute mercury loading to the river within the first two miles of the South River adjacent to and downstream of the former DuPont facility in Waynesboro, Virginia.

DuPont is committed to implementing corrective actions on the South River and South Fork Shenandoah River in a manner that protects human health and the environment. DuPont is equally committed to involving community stakeholders prior to and during the project. This Community Involvement Plan presents several traditional and innovative methods that will be used to inform and seek feedback from community stakeholders prior to and during remedial activities. Equally important, DuPont will continue its existing community involvement and outreach efforts to enhance the understanding and compliance with the fish consumption advisories. This Community Involvement Plan will be revised as the project progresses and project needs change.

2.0 BACKGROUND

From 1929 to 1950, DuPont used mercuric sulfate in the production of acetate flake and yarn at the former DuPont Waynesboro facility. This process generated mercury-containing sludge that was conveyed to an on-site retort facility where the majority of the mercury was recovered. During that period, releases of mercury associated with the retort operations occurred. Soil and groundwater impacts have been identified in the former mercury retort area. Also, some of the storm sewers that drain this area were found to be impacted and are currently the primary transport mechanism for mercury loading from the former DuPont Waynesboro facility to the South River.

In 1976, mercury was discovered to be in the tissue of fish in the South River and South Fork Shenandoah River. A fish consumption ban was established and was later changed to the current consumption advisories for over 140 river miles.

Comparisons of fish tissue data collected in the summer and fall of 1999 with data collected in the 1980s and earlier indicated that mercury concentrations had remained steady or increased over time. In 2000, DuPont and the Virginia Department of Environmental Quality (DEQ) discussed the need to reassess the legacy mercury in the South River and South Fork Shenandoah River. These discussions led to the formation of the SRST. The SRST is composed of members from state and federal government, the academic community, local environmental groups, and DuPont. Chartered in February 2001, the SRST has been the focal point for data collection and evaluation and for outreach to the local communities along the rivers (Stahl, et al., 2014).

The United States Environmental Protection Agency (EPA) issued a Hazardous Waste Permit for Corrective Action for the DuPont Waynesboro Facility in September 1998. The on-site facility investigation began the same year. In 2004, ownership and operation of the facility was transferred to INVISTA. A revised permit (VAD003114832) for the former DuPont Waynesboro facility was approved by the DEQ on September 24, 2009. On February 4, 2014, the DEQ signed a modification to the existing permit to address off-site mercury impacts. The off-site area was designated Area of Concern 4 (AOC 4) and includes the aquatic and riparian terrestrial systems (including the floodplain) of parts of the South River downstream of the site and parts of the South Fork Shenandoah River.

The 2014 permit modification establishes the regulatory process and framework under which off-site mercury impacts will be addressed. The technical and outreach efforts of the SRST will continue to contribute to the development of the remedial program.

2.1 Remedial Actions

Based on the findings of a six-year Ecological Study (URS, 2012a) and the results of several remediation pilot studies, DuPont concluded that remediation options may exist

that are safe, effective, and reasonably necessary to address the ecological and human health impacts that may be caused by mercury contamination in these systems. In October 2013, DuPont, with input from the SRST, submitted a Remediation Proposal to comply with provisions of a settlement with the Natural Resources Defense Council and the Sierra Club (Anchor QEA, URS, and DuPont, 2013). The Remediation Proposal provides the framework for stabilizing eroding river banks that have been identified as the major continuing source of mercury input to the South River.

Findings from the Ecological Study and Remediation Proposal, as well as additional data collected from specific riverbanks were used to develop the *Interim Measures Design, Implementation, and Monitoring Work Plan - Phase 1: South River Area of Concern 4* (IM Work Plan) (Anchor QEA, 2014). This work plan identifies specific riverbanks that will be stabilized to reduce or curtail their current contribution of mercury loading to the river. The identified riverbanks are located within the first two miles downstream of the former DuPont Waynesboro facility. These riverbanks are owned by the City of Waynesboro and private citizens. DuPont anticipates that design and permitting of the stabilization activities will be complete by the end of 2015 and that implementation will begin in early 2016. The completion of construction activities for riverbank stabilization is expected to require two or more years.

2.2 Relationship to Other Actions

DuPont is conducting remedial actions associated with the aquatic system (as described above) in parallel with other efforts that may have relevance for the scope of remediation actions. Ecological and human health risk assessments may identify other areas where remedial measures are necessary or that necessitate implementing remedies out of sequence. In addition, interim measure and other corrective action activities performed on-site at the former manufacturing facility may lead to improved source controls; it will be important to understand the effect of these actions on the short-term and long-term response of the South River. These efforts are briefly described in the subsections below.

2.2.1 Ecological and Human Risk Assessments

Consistent with EPA guidance, ecological and human health impacts that may be caused by mercury contamination in the South River and a segment of the South Fork Shenandoah River are best addressed by applying a comprehensive set of remedial action objectives that integrate affected environmental media, transport mechanisms, and exposure pathways. As such, DuPont is developing a floodplain risk assessment under regulatory agency oversight that will include a conceptual site model (CSM) specific to potential ecological and human receptors and relevant exposure pathways associated with the floodplain. Remediation strategies for the floodplain continue to be investigated and, upon completion of the risk assessment for the floodplain, a corrective action approach will be developed and integrated into the adaptive management strategy for the South River and South Fork Shenandoah River system. The results of these risk assessments may identify other potential sources of mercury or areas of

elevated mercury concentrations in environmental media that will be addressed under the AOC 4 Corrective Action Program and as part of the adaptive management process.

2.2.2 Interim Corrective Actions

In order to identify and characterize sources of contamination at the former DuPont Waynesboro facility, DuPont conducted a facility investigation under the permit. The investigation findings and recommendations, as submitted in the Comprehensive Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Report (URS, 2012b), identified the following three units for evaluation of corrective action alternatives in the Corrective Measure Study (CMS), which is currently under development:

- ❑ Former Mercury Recovery Area – Solid Waste Management Unit (SWMU) 1
- ❑ Former Incineration Area – SWMU 4
- ❑ Former Sludge Pond – SWMU 7

In addition, outfall discharges and groundwater beneath the former mercury area were identified to evaluate corrective action alternatives in the CMS. As part of the CMS, DuPont is evaluating corrective action alternatives with input from the DEQ and EPA to address remaining upland mercury sources at the facility, including mercury discharges in the plant outfalls. Until a final plan of corrective action is approved, DuPont is implementing interim measures, including cleaning of impacted sewers and cutting off or removing drainage structures known to be conveying mercury to the sewer system. Additional interim measures will continue to be implemented at the facility in conjunction with continued monitoring of groundwater and outfall discharges to ensure the effectiveness of corrective measures prior to implementing work in the river.

3.0 COMMUNITY INVOLVEMENT TOOLS AND ACTIVITIES

DuPont is committed to implementing remedial actions on the South River and South Fork Shenandoah River in a manner that protects human health and the environment. DuPont is equally committed to involving the public during the project. To achieve this goal, DuPont will provide the public with the following:

- Accurate, timely, and understandable information and/or access to the information to understand the project as it progresses
- The opportunity for informed and meaningful participation
- Adequate time and opportunity for participation

DuPont will continue with its current community involvement activities and will expand the existing program (see Figure 1). The foundation of DuPont's approach has relied and will continue to rely on the following elements:

- Transparency in communication
- Meaningful information with science-based supporting data
- Flexibility in process
- Responsiveness to stakeholders

Current and proposed community involvement tools and activities generally fall into one or more of the categories listed below (Ecology and Environment, 2009). Other activities may be developed and used as more information or technologies develop.

- Output: How DuPont shares information with the public
- Input: How DuPont receives information from the public
- Outreach: How DuPont promotes education and awareness about the project
- Involvement: How DuPont encourages public participation in the project

A matrix showing these categories vs. DuPont's current and proposed community involvement tools and activities is provided in Table 1.

3.1 Tools

The following tools will be used to ensure community involvement: the SRST office, a newsletter, information bulletin boards, the SRST website, fact sheets, a frequently asked questions flyer, mailing lists, and telephone and electronic mail. These tools are described in the subsections below.

3.1.1 SRST Office

In 2006, DuPont transformed a former Red Cross office on Main Street in Waynesboro, Virginia into an information repository and field office for SRST activities. The SRST office is approximately 500 square feet in size, with half of the space dedicated to support river data collection activities. From 2006 to 2010, the front of the office visible from Main Street was maintained as a visitor center. Groups from local schools, government agencies, and nonprofit organizations, as well as individuals routinely visited to tour displays depicting the history of the mercury situation and the work of the SRST. In 2010 after visitations decreased, the front part of the office was converted into a meeting space and information center. The displays formerly located in the office continue to be used by SRST members at public forums. Currently, the office also hosts a small trout grow-out facility to promote the efforts of the Center for Coldwater Restoration. Insect and fossil displays from the Virginia Natural History Museum are displayed as well.

The SRST office is open to the public. Hard copy materials about the fish advisories, SRST fact sheets, and the SRST newsletter *UPDATE* are available. In addition, community events can be posted on a bulletin board.

For this project, the office will serve as the central point for community stakeholders to receive information on the project and ask questions. In addition, field activities will be coordinated from this location. A full-time employee is assigned to the office and is available to assist with stakeholder inquires. The SRST office is open to the public Monday through Friday from 8 a.m. to 5 p.m. and evenings by appointment. Visitors are welcome at any time, but on occasions when the office is unoccupied a contact number is posted on the door. The office address and a location map, as well as a contact e-mail address, are provided on the SRST website (<http://southriverscienceteam.org/contact/>).

3.1.2 UPDATE

DuPont publishes the SRST newsletter *UPDATE* twice per year in cooperation with SRST members and the DEQ, Virginia Department of Game and Inland Fisheries (DGIF), and VDH. From 2002 to 2013, a variety of research and outreach activities were featured in a four-page layout format. With the project shifting from investigation to implementation, the newsletter format will be modified to two pages and will focus on off-site project work, on-site remedial efforts, and continuing research activities. Individuals and physicians in the area receive *UPDATE* via U.S. mail and electronically based on their preference. Individuals wanting to be added or deleted from the distribution list can contact Kathy Adams at 302.999.3856 or kathleen.o.adams@dupont.com. This contact information is provided on the back page of the newsletter and is available to individuals through the PDFs on the SRST website, as well as an email link on the website under “News and Information, Newsletters” (<http://southriverscienceteam.org/news/>).

DuPont will continue to publish *UPDATE* twice per year in cooperation with SRST members and local agencies to keep the community informed of the project's progress. In addition, DuPont will expand the audience of the newsletter by distributing a Spanish version via the Promotores Program. Past newsletter issues are available on the SRST website, and future issues will be posted as well.

3.1.3 Information Bulletin Boards at Fishing Access Areas

Consumption advisory signs in English and Spanish are posted on information bulletin boards at South River and South Fork Shenandoah access locations. According to the VDH, the South River and South Fork Shenandoah River are the only rivers in Virginia with Spanish advisory signs posted. In addition, a brochure entitled *Should I Eat the Fish I Catch* is posted in English and Spanish. This brochure was developed by the VDH, DGIF, DEQ, and DuPont and translated into Spanish by Promotores Program representatives. DuPont provides the brochures as needed based on requests from state and federal agencies and Promotores Program personnel. The DEQ ensures that copies of both the English and Spanish versions of the brochure are available for individuals to take from the bulletin boards. DuPont will continue to provide materials and funding to the DEQ to maintain and stock the bulletin boards.

3.1.4 SRST Website

The SRST website (<http://southriverscienceteam.org/>) was developed in 2007 to inform the public about SRST activities and serve as a repository for SRST member documents. The website was re-designed in 2012 to meet the changing needs of the SRST and other stakeholders. All areas of the new website are open to the public. Upgrades include fish consumption advisory buttons on multiple pages; an interactive map showing the advisories along with boat ramps, float trips, and parks (<http://southriverscienceteam.org/map/>); an area to store meeting documents (<http://southriverscienceteam.org/news/documents/>); and information in Spanish (<http://southriverscienceteam.org/avisos/> and <http://southriverscienceteam.org/promotores-de-salud/>). Since the upgrade, website use has been tracked. From 2013 to 2014, the newly designed SRST website was accessed over 1,000 times, with over 3,200 page views (i.e., the amount of times visitors arrive on individual website pages).

DuPont will continue supporting the maintenance of the website, which includes posting SRST meeting materials (i.e., agendas, attendee listings, presentations, and minutes); fact sheets; upcoming community events (<http://southriverscienceteam.org/programs/>); and presentations, publications, and other technical documents pertinent to the team's work (<http://southriverscienceteam.org/news/>).

3.1.5 SRST Fact Sheets

DuPont, in cooperation with SRST members and the DEQ and EPA, has developed the six fact sheets listed below to update stakeholders on SRST activities and findings. These one-page documents provide site-related information in a brief, easy to read format.

- ❑ *About the South River Science Team*
(Fact Sheet 1, issued August 2009, revised March 2014)
http://southriverscienceteam.org/news/fact-sheets/SR_No1-recycle-final.pdf
- ❑ *People, Mercury, and the River*
(Fact Sheet 2, issued September 2009, revised March 2014)
http://southriverscienceteam.org/news/fact-sheets/SR_No2-recycle-final.pdf
- ❑ *Summary of South River Floodplain Soil Survey*
(Fact Sheet 3, issued January 2010)
http://southriverscienceteam.org/news/fact-sheets/SR_No3-recycle-final.pdf
- ❑ *Riverbank Stabilization Pilot Project*
(Fact Sheet 4, issued September 2009)
http://southriverscienceteam.org/news/fact-sheets/SR_No4-recycle-final.pdf
- ❑ *Eating Vegetables Grown on the South River Floodplain*
(Fact Sheet 5, issued August 2010, revised March 2014)
http://southriverscienceteam.org/news/fact-sheets/SR_No5-final.pdf
- ❑ *Eating Waterfowl, Game, and Other Animals from the South River Watershed*
(Fact Sheet 6, issued April 2014)
http://southriverscienceteam.org/news/fact-sheets/SR_No6_eating_waterfowl_Game_Other_Animals_final.pdf

DuPont will continue to develop fact sheets as necessary in cooperation with the DEQ and EPA. For example, pending DEQ approval of the IM Work Plan for the riverbank stabilization project, DuPont will develop a fact sheet to provide an overview of the history, objectives, and concept for the planned activities. DuPont will translate this new fact sheet into Spanish and it will be distributed by the Promotores to help Spanish-speaking community members understand the goal of riverbank stabilization efforts. As in the past, DuPont will coordinate with the DEQ when developing new fact sheets and allow the DEQ to review drafts before finalization.

Fact sheets are available on the SRST website and at the SRST Office. Fact sheets are generally provided as handouts to the public during community events or student outreach activities.

3.1.6 Frequently Asked Questions Flyer

DuPont will develop a list of frequently asked questions about the riverbank stabilization project. The flyer will be mailed to interested community members using a recently

developed customized mailing list (see Section 3.1.7) and handed to public forum and stakeholder information session participants.

3.1.7 Mailing Lists

DuPont uses customized mailing lists to inform the community and other interested stakeholders about the project via the SRST newsletter *UPDATE* and letters to landowners. Conservation organizations, outfitters, local and state government agencies, media contacts, local industries, libraries, elected officials, floodplain landowners, schools and universities, SRST members, and physicians are included on these mailing lists. By using these lists, DuPont is able to effectively communicate project and event information to a diverse audience. The DEQ provides DuPont with an updated physicians' mailing list on a regular basis, and the SRST website and *UPDATE* provide an opportunity for individuals to be added or deleted from the mailing list.

In 2013, DuPont used tax parcel information to develop a mailing list of landowners in the 62-year floodplain of the affected section of the river. This list, along with the SRST mailing list, contained approximately 350 addresses. On November 4, 2013, DuPont sent a letter via U.S. mail using this mailing list. The letter provided instructions on how to join a mailing list for information about RCRA activities. Recipients could respond via a toll-free telephone number or electronic mail and indicate their preference for electronic mail vs. paper mail. Over 50 individuals responded; future information about the remediation will be sent to these individuals based on this response. This mailing list is referred to as the RCRA mailing list.

3.1.8 Telephone and Electronic Mail

DuPont receives information and input from the public via the telephone and electronic mail. Contact information for project representatives from DuPont, DEQ, DGIF, and/or the VDH appears on brochures, fact sheets, and newsletters. Providing these contacts allows the public to provide input, follow up on a discussion, or request information. This form of input has proven effective, in that several contacts have been made by the public using information from handouts.

3.2 Activities

To ensure community involvement in the project, DuPont will establish a Remediation Advisory Panel; hold meetings with landowners and the City of Waynesboro; conduct stakeholder information sessions; continue to participate in SRST meetings; continue and expand the Promotores Program; continue to participate in community events and school outreach activities; and hold media briefings. These activities are described in the subsections below.

3.2.1 Remediation Advisory Panel

DuPont will establish a Remediation Advisory Panel as a means through which members of community and stakeholder groups can discuss their viewpoints as the project

progresses. The establishment of this Panel will ensure routine and consistent communication between all parties.

To the extent possible, Panel members will be sought from groups representing diverse interests and the community at large. Panel members will not necessarily represent official positions from the sponsoring group. DuPont, working with the Panel Facilitator and obtaining input from the SRST and DEQ, will prepare and send letters via U.S. mail to local organizations and groups (such as those listed below) requesting that the organization select a representative to serve on the Panel.

- Augusta Chamber of Commerce
- City of Waynesboro (Planning, Public Works)
- Farm Bureau (especially to represent riparian landowners)
- Service clubs (e.g., Rotary, Kiwanis)
- Trout Unlimited (Virginia Chapter)
- Waynesboro Health Department
- Waynesboro Downtown Development
- Faith community
- Shenandoah Riverkeeper
- State environmental agencies (e.g., DEQ, Department of Game and Inland Fisheries)
- Multi-lingual community

Eight to 12 individuals will be invited to serve as Panel members for an initial two-year period. Appendix A provides a draft charter for the Panel. After Panel members are selected, they will meet and review and finalize the charter provided in Appendix A.

3.2.2 Meetings with Landowners

For properties that will be impacted by remedial activities, DuPont will meet individually with each landowner prior to initiating pre-design efforts. The first meeting will be dedicated to explaining the history and objectives of the project and seeking formal access permission. Pre-design efforts will commence once a formal access agreement is signed by the landowner. DuPont will schedule another pre-design and 90% design meeting to provide the landowners with the final design package for approval prior to construction. DuPont will work with the DEQ to resolve issues with landowners who are unwilling to grant access.

3.2.3 City of Waynesboro Meetings

The first series of riverbanks identified for stabilization are owned by the City of Waynesboro. Therefore, it is important to establish a relationship with the City to coordinate and integrate the riverbank projects with other City-administered programs such as stormwater improvements, upgrades to parks, and the greenway construction. The first meeting with City representatives, DuPont, and the DEQ was held in January 2014. The next meeting will be scheduled within 30 days after receiving the DEQ's approval of the IM Work Plan, which identifies the specific riverbanks to be stabilized. A formal list of meeting participants will be established, and consensus will be obtained on an appropriate meeting schedule for the duration of the project.

3.2.4 Public Information Sessions

DuPont will hold an annual public meeting prior to the construction season each year to provide information about planned work along the river and other RCRA activities. The date, time, and location of the public meeting will be advertised in the local paper and a letter will be sent via U.S. mail to those individuals on the RCRA mailing list.

These sessions will be designed to enable community stakeholders to ask questions in a comfortable and informal setting. At these sessions, detailed project information will be presented on posters and displays so that individuals can inquire about issues that are most important to them and can have an opportunity to speak freely on a one-to-one basis with DuPont representatives and their contractors and possibly agency representatives. DuPont will coordinate these sessions with local, state, and federal agencies to ensure that sessions are conducted as needed at convenient times and places.

The first public information session will be held in late 2015 or the spring of 2016 prior to the start of the first phase of bank stabilization construction. DuPont and the DEQ will determine if a second public meeting each year is appropriate.

Per the RCRA permit, DuPont will hold a public information session in late October 2014 after submission of the RCRA Facility Investigation Report and during DEQ review.

3.2.5 SRST Meetings

The SRST meets three to four times a year to present and discuss the results of past work and identify a plan for activities. The meetings are located at the DEQ's Valley Regional Office in Harrisonburg, Virginia, and schedules and agendas are available on the SRST website and e-mailed to a distribution of over 150 government, academic, municipal, and nonprofit stakeholders. As stated previously, the SRST was formed in 2001 as a focal point for technical issues concerning mercury in the South River and downstream waterways. The SRST is a cooperative effort between the DEQ, VDH, DGIF, EPA, and representatives from academia, citizens groups, and DuPont. Information presented at these meetings, as well as agendas and minutes, are posted to the SRST website.

DuPont will continue to participate in SRST meetings and keep members informed of project progress. The final design, implementation, and monitoring of the riverbank stabilization will have substantive input from the SRST, particularly the Remedial Options Task Team, Monitoring Task Team, Exposure Task Team, and Communications Task Team.

3.2.6 Promotores Program

According to the U.S. Census, the total population of Hispanics in Harrisonburg, Virginia, alone almost doubled from 2000 (8.8%) to 2010 (15.7%). These changing demographics required specific outreach activities aimed at immigrant populations. The SRST, working through James Madison University, developed a community outreach program in 2010 that takes a more interactive approach to communicating the fish consumption advisory to this community.

The program is called Promotores de Salud and, through it, Promotores will be trained as community health and mercury educators. Promotores are members of the local community who educate fellow residents in the watershed regarding fish consumption. The benefits go well beyond communicating fishing precautions. Through the Promotores, the program provides educational materials on mercury and promotes improvements to the general health, nutrition, and well-being of the local Hispanic community.

In 2011, 18 Promotores graduated from a 40-hour training course, with five more joining their ranks in 2013, and seven more graduating in 2014. The Promotores are residents of Luray, Shenandoah, McGaheysville, Waynesboro, and Harrisonburg and represent five Latin American countries. Through their work, they have made over 6,000 health contacts in these areas.

As a member of the SRST, DuPont has been collaborating with Promotores de Salud since 2011. Since that time, other non-English speaking groups, including Russian and Arabic speaking populations, have been identified and incorporated into the Promotores de Salud program. DuPont is working with program representatives to produce the brochure entitled *Should I Eat the Fish I Catch* (see Section 3.1.3) in Kurdish and Arabic.

DuPont will continue to support this program, a similarly oriented program, or alternative methods to effectively educate minority communities along the South River and South Fork Shenandoah River about the mercury fish consumption advisories. In addition, DuPont will leverage the contacts of the Promotores to communicate information about project work. As discussed in Section 3.1.2, DuPont will expand the audience of the current SRST newsletter by distributing a Spanish version through the Promotores Program. In addition, DuPont will develop a new fact sheet (see Section 3.1.5) about the riverbank stabilization and will translate it into Spanish for distribution by the Promotores.

3.2.7 Community Events

DuPont is an annual sponsor and active participant in Riverfest, a free event at Constitution Park in Waynesboro on the first Saturday in May designed to promote environmental conservation and watershed stewardship in the Shenandoah River Basin. In 2014, Riverfest was attended by over 1,800 children and adults. Each year, DuPont and SRST members staff a booth to provide information about the river mercury situation and answer questions. Hundreds of individual contacts are made through either conversations or material distributions.

On the Thursday prior to Riverfest, DuPont participates in Student Day, which allows all 7th graders in the Waynesboro School District to experience an outdoor classroom on the South River. The students spend approximately three hours rotating through learning stations addressing topics such as the mercury consumption advisories, macroinvertebrate and fish identification, water chemistry, and environmental impacts. Approximately 150 student contacts are made annually through Student Day.

Each year DuPont will determine if community events such as Riverfest and the Waynesboro Fly Fishing Festival will be attended to inform stakeholders about the fish consumption advisories and remedial efforts.

3.2.8 School Outreach Activities

Based on requests, DuPont representatives make presentations to science classes at Kate Collins Middle School in Waynesboro and the Governor's School in Fishersville. Presentation topics are associated with the science of the South River of which the details of the fish consumption advisories is an integral part. DuPont representatives have been making an average of two to three presentations per semester.

3.2.9 Media Briefings

Based on the amount of project activity, DuPont will provide status information about the stabilization project to media sources at key milestones. Media sources may include, but are not limited to, the following:

- Newspapers, such as the *Waynesboro News Virginian* and *Staunton News Leader*
- NPR radio stations in Harrisonburg (WMRA) and Charlottesville (WVTF)
- Television stations, such as Charlottesville stations WCAV, WVAW, WAHU, and WVIR

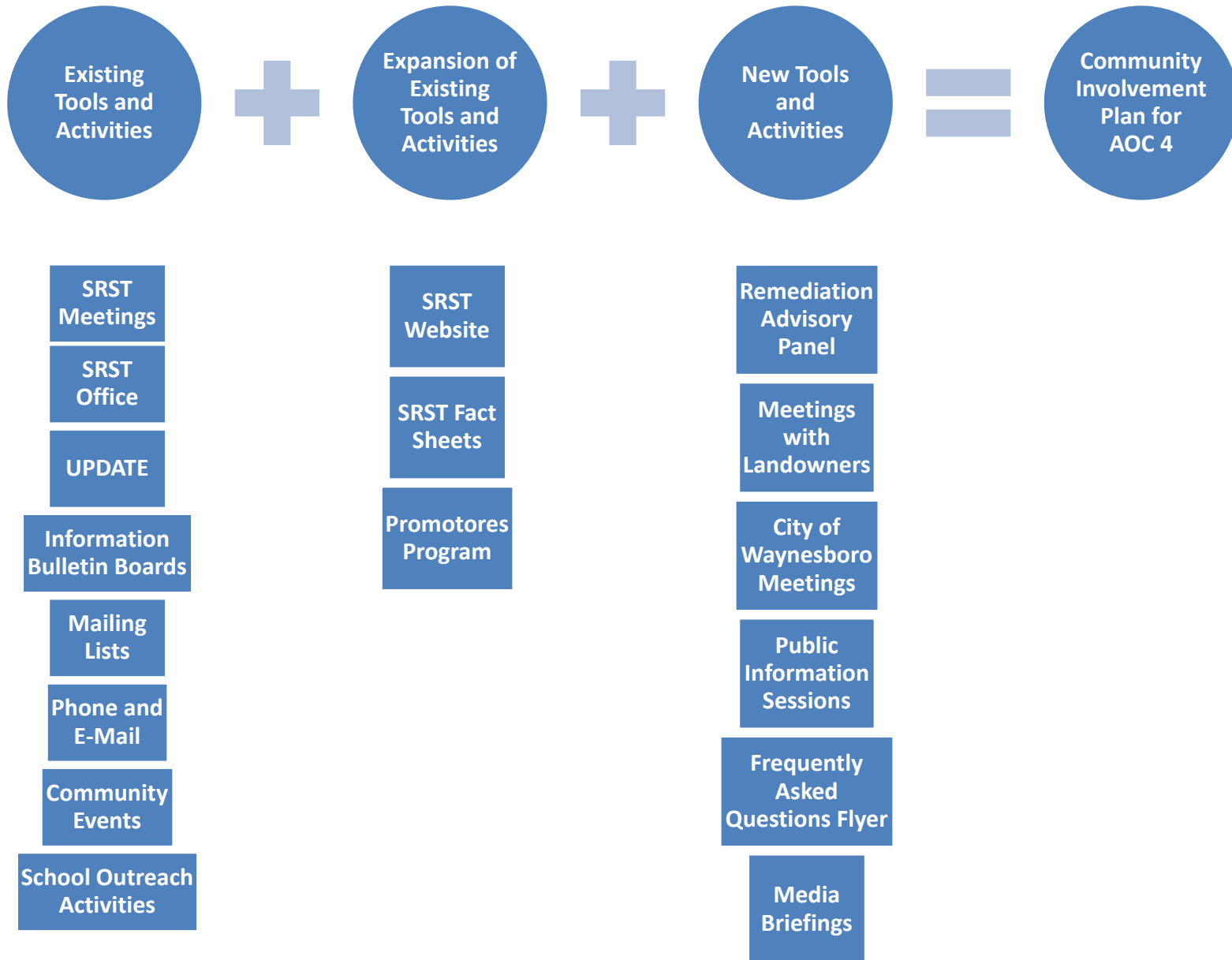
Based on the project schedule and agency approvals of project submittals, DuPont anticipates performing media briefings once or twice per year. Media briefings will consist of a technical presentations and an opportunity for questions and answers.

4.0 REFERENCES

- Anchor QEA. 2014. *Interim Measures Design, Implementation, and Monitoring Work Plan - Phase 1: South River Area of Concern 4*.
- Anchor QEA, URS, and DuPont. 2013. *Remediation Proposal: South River and a Segment of the South Fork Shenandoah River, Virginia*. October.
- Ecology and Environment. 2009. *Hudson River PCBs Superfund Site Community Involvement Plan*. June. 002260.HR04.02.03
- Stahl, R.G., Jr.; D. Kain; P. Bugas; N. Grosso; A. Guiseppi-Elie; and M. Liberati. 2014. "Applying a Watershed-Level, Risk-Based Approach to Addressing Legacy Mercury Contamination in the South River, Virginia: Planning and Problem Formulation." *Human and Ecological Risk Assessment* 20:316-345.
- URS. 2012a. *Final Report: Ecological Study of the South River and a Segment of the South Fork Shenandoah River, Virginia*. September.
- URS. 2012b. *Comprehensive Resource Conservation and Recovery Act (RCRA) Facility Investigation Report, Former DuPont Waynesboro Plant*. Prepared in November 2009; revised in August 2012.

FIGURE

Figure 1. Elements of Community Involvement Plan for AOC 4



TABLE

**Table 1
Current and Proposed Tools and Activities
vs. Community Involvement Categories**

DuPont Current and Proposed Tools and Activities	Community Involvement Categories			
	Output (how DuPont shares information with the public)	Input (how DuPont receives information from the public)	Outreach (how DuPont promotes education and awareness about the project)	Involvement (how DuPont encourages public participation in the project)
SRST Office	●	◉		
<i>UPDATE</i> (SRST newsletter)	●		◉	
Information Bulletin Boards at Fishing Access Areas	●		◉	
SRST Website	●		◉	
SRST Fact Sheets	●		◉	
Frequently Asked Questions Flyer	◉		●	
Mailing Lists	●		◉	
Telephone and Electronic Mail	◉	●		
Remediation Advisory Panel		●		◉
Meetings with Landowners	●	◉		
City of Waynesboro Meetings	●	◉		
Stakeholder Information Sessions	◉	●		
SRST Meetings		◉	●	
Promotores Program			◉	●
Community Events		◉	●	
School Outreach Activities		◉	●	
Media Briefings	◉		●	

● = Primary method ◉ = Secondary method

APPENDIX A
DRAFT REMEDIATION ADVISORY PANEL CHARTER

Remediation Advisory Panel Charter

DuPont is committed to implementing remedial actions on the South River and South Fork Shenandoah River in a manner that protects human health and the environment. DuPont is equally committed to involving the public during the project. The Remediation Advisory Panel provides a means through which members of community and stakeholder groups can discuss their viewpoints as the project progresses. The mission and the frequency, location, and agendas for meetings will be developed by Panel members after they are selected and agree to serve.

Mission

The mission of the Remediation Advisory Panel is to facilitate communication and understanding between DuPont and community stakeholders about remedial efforts associated with mercury in the South River watershed so that:

- DuPont gains input and insight from a diverse community audience.
- Information about the project's progress and plans are disseminated broadly.

Purpose

The purpose of the Remediation Advisory Panel is to represent the voice of the community during the implementation of remedial actions on the South River and South Fork Shenandoah River.

Membership

The Remediation Advisory Panel will be active during remedial efforts associated with mercury in the South River watershed. The Panel composition and member tenure are outlined below. The Panel selection process is provided in the *Community Involvement Plan*.

- Composition of Panel
 - The Panel will be composed of eight to 12 members and a Facilitator. The Panel has no chairperson.
 - The Facilitator will be Mr. David Hirschman, Program Director of the Center for Watershed Protection. (A biography detailing Mr. Hirschman's background and education is available at <http://www.cwp.org/staff>.)
 - Panel members should reside in (or proximate to) Waynesboro, Virginia, or the surrounding area along the South River and South Fork Shenandoah River.
 - Panel membership should be diverse and represent a cross section of the community.
- Tenure of Service and Vacancies
 - Members will serve an initial two-year term. Panel members may resign from the Panel at any time. If vacancies occur, members will be replaced by individuals with the same general interests and expertise as the original appointee.

Expectations

As the name implies, the Remediation Advisory Panel will be an advisory group—not a decision-making body. DuPont will not ask the Panel to formally approve or disapprove any action by

Remediation Advisory Panel Charter

the company, but will be responsive to concerns and issues voiced by Panel members. Additional expectations are as follows:

- Individuals will not be compensated for participating on the Panel.
- Panel members are encouraged to attend every meeting and will sign in upon arrival. Members are asked to alert the Facilitator if they will be unable to attend a meeting. Members who miss three consecutive meetings without notifying the Facilitator may be asked to resign from the Panel. The seat will be declared vacant, and the identification process for new members will commence.
- Panel members will personally participate on the Panel and commit to attend meetings to the extent possible. Members will work with other members to present their concerns when absence is necessary.
- Panel members do not serve as media or public spokespersons for the group unless the group designates them to do so.

Meetings

The following items are associated with the Panel meetings:

- Panel meetings will be held twice per year during the first and third quarters of each year.
- Each meeting will be approximately 90 minutes long.
- Meetings will be facilitated by Mr. Hirschman who will develop and vet agendas with Panel members and work at the direction of the Panel.
- The Facilitator will send a notice prior to each meeting to remind members of the next scheduled meeting. Notices will be sent out two weeks prior to the meeting and a reminder will be issued approximately one week in advance.
- In general, meetings will not be open to the media to allow individuals to speak more freely.
- The Facilitator will notify Panel members if an insufficient number of people (i.e., five or fewer) will be in attendance and will select an acceptable alternate meeting date.