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Agency

Environmental  
Accountability  
Division  
(4EAD)

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**INTERIM POLICY  
TO IDENTIFY AND ADDRESS  
POTENTIAL ENVIRONMENTAL  
JUSTICE AREAS**

## FOREWORD

This policy will be used by regional staff and management until such time that national guidelines are developed by EPA Headquarters. However, it should also be considered a “living document” which will be subject to modifications as new information becomes available and feedback from Region 4 staff, management, and stakeholders is received. We welcome your comments, suggestions, and questions on the policy. Please direct all feedback to Connie Raines at 404-562-9671 or Sheryl Good at 404-562-9559.

This document represents the combined efforts of each division, under the guidance of the Environmental Justice/Community Liaison Program (EJ/CLP) staff. The policy was developed to outline a process for EPA Region 4 management and staff to use when determining whether a case should be considered a potential EJ area and if so, what course of action should be taken. By establishing this methodology, the policy serves as a useful tool to help ensure the integration of EJ into our daily activities.

If there are any questions in regards to the implementation of the policy, please contact any of the current members of the Region 4 EJ cross-divisional team listed below:

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## **DISCLAIMER AND ACKNOWLEDGEMENTS**

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In addition, the EPA Region 5 and Region 2 Offices of Environmental Justice (OEJ) should be recognized for their assistance in developing the Region 4 Interim EJP document. They are to be commended for creating useful regional policy guidance documents that were used as a source of reference.

The demographic information, methodology, and potential environmental justice area designation herein do not represent a final Agency decision and are intended solely to improve the internal management of EPA Region 4 with respect to environmental justice. They are not intended, nor can they be relied upon, to create any rights, benefit, trust, or trust responsibility, substantive or procedural, enforceable at law or equity, by any party in litigation with the Agency. EPA officials may decide to follow the methodology, and designations presented in herein, or to act at variance with the Interim EJP, based on an analysis of specific cite circumstances. Compliance with this policy will not be justiciable in any proceeding for judicial review of Agency action. The Agency reserves the right to change this Interim EJP at any time without public notice.

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# 1. INTRODUCTION

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In recent years, environmental justice (EJ) has emerged as a national and regional policy issue due to the EJ grassroots movement and struggles and several initiatives spearheaded by federal agencies and community organizations. In 1994, the Presidential Executive Order on Environmental Justice #12898 set the U.S. Environmental Protection Agency (EPA), as well as other federal agencies on a new road to prioritize the issues of environmental justice. It stated

“each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States and its territories and possessions.” *Section 1-1, Executive Order No. 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*

Since the issuance of the Executive Order, EPA Headquarters and Regional Offices have dedicated attention and resources toward EJ issues. Offices of Environmental Justice were created across the country by various federal agencies. In 1994, the EPA Administrator chartered the National Environmental Justice Advisory Council (NEJAC), a federal advisory council focused on EJ issues. NEJAC meets biannually and supplies policy advice to assist the EPA in serving the public. Since its inception, the NEJAC has become an integral part of the EPA’s EJ program.

On February 5, 1998, the EPA Office of Civil Rights issued an interim guidance on processing Title VI civil rights complaints regarding environmental permitting. Issuance of this guidance has increased national visibility and awareness of the responsibility local, state, and federal governments are held by to comply with civil rights obligations in environmental decision-making.<sup>1</sup>

## A. Understanding the Definition of Environmental Justice

The EPA Headquarters Office of Environmental Justice (OEJ) has adopted the definition of EJ established by the Office of Solid Waste and Emergency Response (OSWER). It is defined as:

“The fair treatment of people of all races, cultures, incomes, and educational levels with respect to the development and enforcement of environmental laws, regulations, and policies. Fair treatment implies that no population should be forced to shoulder a disproportionate share of

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<sup>1</sup> Executive Order #12898 attempts to deal with disproportionate risk to *minority and/or low-income* communities, whereas Title VI prohibits discrimination based on *race, color, or national origin*, and the measure of discrimination is whether or not an adverse disparate impact exists.

exposure to the negative effects of pollution due to lack of political or economic strength.”<sup>2</sup>

In the Director of OEJ’s memo dated December 16, 1998, he says, “This definition is compatible with the mission of the Agency which is to protect human health and to safeguard the natural environment - air, land, and water - upon which life depends.” In addition, “The OSWER’s 1995 publication was widely distributed to business and industry; federal, state and local government environmental regulatory offices; environmental organizations and other non-governmental organizations and associations; national, state, and local bar associations; law firms and corporate environmental counsel offices; community and grassroots group; and the general public. Therefore, many individuals, groups, and organizations are well acquainted with this definition. Moreover, the OEJ has used and will continue to use this definition of EJ. It is therefore, strongly recommended that, until such time that the Agency changes the above definition, this should serve as the Agency’s standard definition of EJ because it is not only quite comprehensive but also is the generally accepted definition since 1995.”<sup>3</sup>

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<sup>2</sup> Source: “Guide to Environmental Issues - Earth Day 25 Edition, April 11, 1995,” EPA/OSWER, No. 520/B-94-001 (April 1995) at 53.

<sup>3</sup> Source: “Distinction Between Environmental Justice and Title VI, And the Future Direction of the Office of Environmental Justice” Memo from Barry Hill, Director of OEJ, December 16, 1998

## 2. PURPOSE AND USE OF THIS POLICY

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The purpose of this Interim EJ Policy is to provide clarification on the concepts of EJ to Region 4 staff. The policy outlines a process to help determine whether a case<sup>4</sup> should be considered a potential EJ case, and if so, what course of action should be taken. It accomplishes this by explaining the necessary tools to properly define a potential EJ area of concern, setting forth a process to gather baseline information to conduct an EJ analysis, and considering alternative actions which may lessen the impact on the affected community.<sup>5</sup> It will serve as a useful guide for all employees to make some significant steps toward implementing EJ into functional activities, and as a result, help make a difference in the lives of many depending on EPA to protect human health and the environment. It is intended that awareness and integration of EJ across all functional levels of Region 4 will be increased.

Overall, the policy was created to fulfill an immediate need to provide Region 4 staff with guidance to:

- clarify the concept of EJ through uses of terminology, definitions, and methodologies through the use of state-by-state thresholds;
- identify potential EJ areas of concern consistently;
- ensure greater public participation;
- answer EJ-related questions that are frequently asked; and
- provide a road map for all staff to integrate EJ into daily functions.

This policy provides a method for defining minority and low-income populations which is the first step to identifying potential EJ areas of concern.. Once the basic definitions and analytical concepts are introduced, the policy delves into how the user can implement EJ in enforcement, permitting, remediation, and other activities of Region 4. These sections of the policy address EPA Region 4 practices whereby the fair implementation of environmental laws and meaningful involvement of all stakeholders can be carried out. It also prompts the user to explore other opportunities to help achieve “win-win” results for all parties involved.

It also includes a comprehensive discussion on stakeholder involvement which is considered crucial in ensuring that decisions affecting human health and the environment embrace EJ. If EPA Region 4 involve affected communities in our decision-making process early on, a greater possibility exists to enhance trust and partnership between EPA and these affected communities on environmental issues. Most important, more effective solutions are borne from this collaborative environmental decision-making.

As attachments, we included several items to supplement an understanding for all

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<sup>4</sup> “Case” broadly means any site, project, community, area, enforcement action, inspection, regulated facility permitting action, administrative case, or judicial case.

<sup>5</sup> Affected community is defined as an area within a community that has the potential for bearing environmental and public health burdens.

employees embarking on a potential EJ case. Persons needing a quick reference may find the Frequently Asked Questions section most useful. Other items consist of the EJ Geographic Information System (GIS) Demographic Request Form and an EJ contact list. Many resources will be available on the Internet or they can be obtained from the Divisional EJ Coordinator(s) or the Environmental Justice/Community Liaison Program (EJ/CLP).

It is important to recognize that there are inherent limitations of the current policy. Although it is possible to determine an actual EJ area of concern, this policy goes as far as national guidance exist. Since policy issues are still emerging, we will only refer to “*potential EJ areas of concern*” for this policy. Noteworthy is that this policy does not currently provide guidance on how to identify *actual* (versus *potential*) areas of concern in Region 4, though these concepts may be incorporated at a later date as the understanding of appropriate analytical approaches develop further on a national and regional basis. Section 4 presents a valuable state-by-state reference which lists the current “relative thresholds” to help determine if a respective EPA case is within a community that is a potential EJ area of concern. Due to this natural progression on EJ methodologies and technical developments, this policy does not include any details on defining *disproportionate effects*; which is a key factor to determining actual EJ areas. The policy does mention the consideration of *cumulative impacts* as it relates to siting of hazardous waste facilities. However, it does not provide the methodology for determining what are the cumulative impacts from one additional siting.

### 3. KEY CONCEPTS AND TERMINOLOGY

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EPA employees need to know when their regulated facilities, enforcement cases, permitting actions, or place-based projects fall within potential EJ areas of concern. This section of the document presents a consistent set of important terms for use in making that determination and to clarify understanding of EJ concepts within this document. A consistent use of these terms can help EPA Region 4 more effectively address EJ in the normal course of work and EJ assessments. The definitions are not intended to carry legal significance, but simply to provide a useful way to consistently describe the issues and ideas pertinent to EJ analyses and their resulting uses in program activities.

#### **Environmental Justice**

The fair treatment of people of all races, cultures, incomes, and educational levels with respect to the development and enforcement of environmental laws, regulations, and policies. Fair treatment implies that no population should be forced to shoulder a disproportionate share of exposure to the negative effects of pollution due to lack of political or economic strength.

#### **Target Area**

A *target area* (study area) is a geographical area that is potentially affected by an action falling under Presidential Executive Order No. 12898. A target area is usually proximate to and may surround a source(s) of potential adverse environmental and/or human health effects, often including, but not restricted to, one or more polluting facilities, or other sources of possible effects. Typically, this is a radius from a point source; however, in some instances the target area may be defined differently (e.g., population along a stream or river).

#### **Target Population**

A *target population* includes the potentially affected residents of the target area. Depending upon the objective and context of the analysis, the target population may also include transient residents such as migrant workers, commuters, and seasonal visitors. A target population may constitute an entire population or a subset within the population (e.g., children or low-income fishermen). Exposure of the target population to an environmental hazard, may be the result of a source(s) *within* the target area or a source *external to* the target area (e.g., consumers of contaminated drinking water or persons doing subsistence fishing on a polluted body of water).

#### **Reference Area/Reference Population**

A *reference area* is the area that is used as a benchmark of comparison when determining whether a *target area* suffers from disproportionate effects to its minority and/or low-income populations. A *reference population* includes the residents of the reference area. Therefore, both the reference area and population provide a context for the interpretation of data from the target area and population.

## **Disproportionate Effect**

A *disproportionate effect* is an incidence (or prevalence) of an effect, a risk of an effect, or likely exposure to environmental hazards potentially causing such adverse health effects on a minority and/or low-income population, or sub-population such as children, that significantly exceeds that experienced by a comparable reference population. Both the Executive Order No. 12898 and the latest EPA interim Title VI [Civil Rights Act] guidance, speak to the need to prevent and remediate *disproportionate effects*. Although a critical element in addressing EJ, the technical approaches for determining *disproportionate effects* are still under development, and as such are not refined and presented herein. When EPA Headquarters policy is generated on the subject of these *effects*, they will be incorporated into this EJ Policy. In estimating *effects*, the possible cumulative nature of these effects should be considered. The concept of *disproportionate effect* on sub-populations (such as high numbers of minority children) is also important and should be considered.

## **Potential EJ Area of Concern**

A *potential EJ area of concern* is a target area that contains relatively high minority and/or low-income population where the existence of disproportionate effects has not been evaluated. Analysis to determine if a site(s) is a potential EJ area of concern may or may not involve the use of a reference area. This is the most commonly used term in Region 4.

## **Actual EJ Area of Concern**

An *actual EJ area of concern* is a target area that has been demonstrated to experience disproportionate effects and has a significant minority and/or low income population relative to an appropriate reference area. Analysis to determine if a site (or sites) is an actual EJ area of concern is more rigorous and requires the use of a reference area.

## **Potential EJ Case**

This refers to a “case” (broadly meaning any site, project, community, area, enforcement action, regulated facility permitting action, administrative case, or judicial case) that falls within a *potential EJ area of concern*. This is the common expression for cases that may have EJ considerations.

## **Actual EJ Case**

This refers to a “case” (broadly means any site, project, community, area, enforcement action, regulated facility permitting action, administrative case, or judicial case) that falls within a target area that has been demonstrated to be within an *actual EJ area of concern* (i.e. experiencing disproportionate effects) through the use of a reference area.

## 4. GUIDELINES FOR IDENTIFYING POTENTIAL EJ AREAS

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The purpose of this section is to provide a recommendation for defining minority and low-income populations, as well as recommended thresholds for determining potential EJ areas of concern. *Figure 1, "Potential EJ Flow Chart"* and *Table 1, "Relative Thresholds for Region 4"* may be used along with concepts presented herein to assess whether a community meets Region 4's state-by-state standards for EJ demographics and income levels.

It is important to note that self-identified EJ communities should be considered potential EJ areas of concern along with those identified through analysis of demographic data. This is because Census data that is generally used in these analyses are from 1990 and so may not be reflective of current demographic conditions.

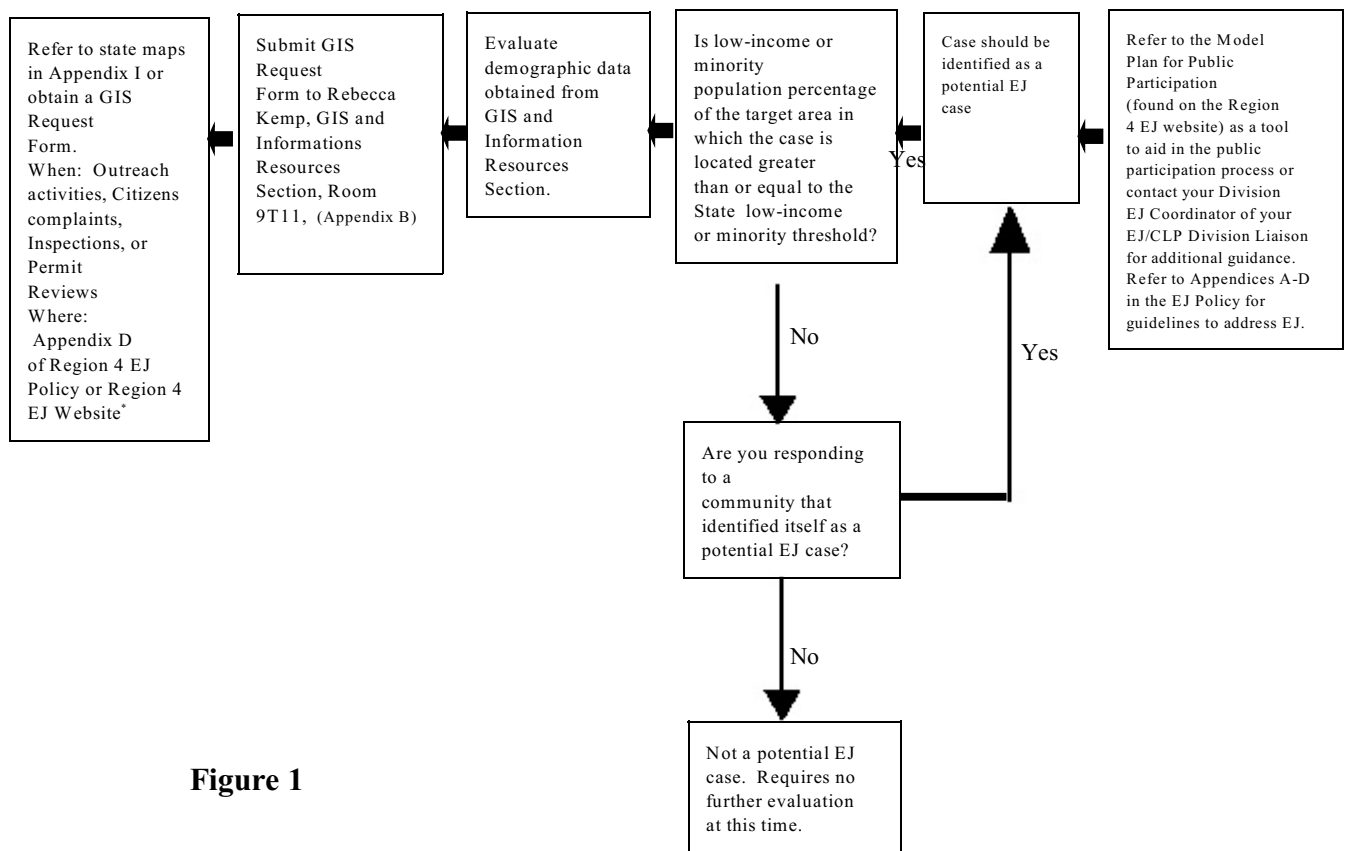
Figure 1 outlines a multi-step process for identifying potential areas of concern. Appendix B outlines the process for obtaining demographic information for a particular case. The procedure generally involved in identifying whether or not the area of interest is a potential EJ area by using either the state maps<sup>6</sup> included in Appendix I as a screening tool and/or submitting a GIS request form found in Appendix B.

As a supplement to the policy, the Region 4 EJ Pocket Guide is available to assist you in identifying potential EJ areas. It offers a concise five-step process to aid in characterizing the area in which you are working. It outlines the GIS request process, evaluating demographic data, and defining the EJ status of the community. The Pocket Guide was developed as a supplement to the EJ Policy to help staff in identifying a potential EJ case for outreach activities, citizen complaints, inspections, and permit reviews. It will not replace the Policy, but will provide a concise, step-by-step approach to identifying potential low-income and minority communities.

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<sup>6</sup> Note: If you experience difficulty in duplicating these maps on a copier, please refer to the colored maps available from your EJ Division Coordinator, EJ/CLP, or submit an EJ GIS Request form to the GIS and Information Section. The maps should be used as a screening tool to determine if your area of interest is a potential EJ area.

# STEPS TO IDENTIFYING A POTENTIAL ENVIRONMENTAL JUSTICE CASE



**Figure 1**

\*Region 4 EJ Website Address: <http://www.epa.gov/region4/ejpps/ejmain.htm>

## A. Recommendations for Defining Minority and Low-Income Populations

This section presents recommendations for defining minority and low-income populations using demographic and low-income data. The following section presents recommendations for determining if these populations are significant and may be considered potential EJ areas of concern.

### 1. Defining “Minority Populations”

This policy uses U.S. Census categories to define “minority” populations. These categories include *American Indian or Alaskan Native, Asian or Pacific Islander, Black, Hispanics* and other *non-White* populations.

### 2. Defining “Low-Income Populations”

There are two options for defining low-income populations in Region 4 analyses and program applications. These definitions should be used at the analyst’s discretion, given the particulars of the EJ assessment being conducted and the attributes of the data being used in the analysis. Some of the advantages and drawbacks to using the different benchmarks are identified below:

- **Below \$15,000** - This threshold is more commonly used than the poverty status threshold described below. The main advantage to using the set income ranges in Summary Tape File 3A (STF3A) as benchmarks for low-income status is that the associated data are updated for population counts more frequently than poverty data and thus are more current. In addition, the data are available for most of the same geographic summary levels and cross tabulations of poverty thresholds. A drawback to using income ranges is that associated data are not adjusted for family size or cost of living by geographic area. The common units for this statistic, are *percent of households in the target area with below \$15,000 income.*
- **Below Poverty Status** - An advantage of using the poverty status as a benchmark for low-income status is that the associated data adhere to a Federal statistical standard. The data are available in a variety of geographic levels; block group, tract, county, place, state, Census region, U.S., zip code, and tribal land. In addition, the data are available in a wide range of cross tabulations, such as race and age, and will facilitate some types of assessments, (e.g., young children below poverty as an indicator of potentially high lead paint exposure). Poverty data are also adjusted for family size and number of dependents. A drawback to using poverty status is that the associated data are adjusted for cost of living on a national basis but not for regional, state or local variations. The common unit for this statistic are *percent of households in the target area that is in below poverty status.*

## B. Determining Potential EJ Areas of Concern

There does not exist one single method for determining potential EJ areas of concern. However, for purposes of this policy, we are advocating the use of the method using relative

minority and low-income thresholds.

**1. Relative Minority and Low-Income Thresholds**

For both the minority and low-income data, use of a relative threshold in EJ analyses is generally recommended for determining significant minority and low-income populations, ( i.e., potential EJ areas of concern.)

- **Minority Thresholds** - The recommended relative threshold for use in Region 4 EJ analyses is 1.2 times the state average. This approach assumes that the distribution of minorities is the same in all reference areas (e.g., Region 4 states). See Table 1 for the recommended thresholds to use by state.
- **Low-Income Thresholds** - As discussed above, an analyst may use either income ranges or poverty status to determine significant low-income populations. The use of a relative threshold is recommended for EJ assessments in Region 4. The relative threshold is defined as 1.2 times the percent of households with incomes below \$15,000 (or the percent of persons in a target area for whom poverty status is determined) in a state. In other words, if the percent of households in a target area with incomes below \$15,000 (or the percent of persons in a target area for whom poverty status is determined) are equal to or greater than 1.2 times the percent of households in a state with incomes below \$15,000 in the state, the target area is considered *a potential EJ area of concern*. For example, if the percent of households in a target area with incomes below \$15,000 (or the percent of persons in a target area for whom poverty status is determined) in Alabama are equal to or greater than 39.76% (22.01% if the poverty threshold is used), that area is considered a potential EJ area of concern.

**Table 1. Relative Thresholds for Region 4**

<b>State</b>	<b>Minority Threshold</b>	<b>Low-Income Threshold (15K)</b>	<b>Low-Income Threshold (Poverty)</b>
Alabama	32.10%	39.76%	22.01%
Florida	31.99%	30.01%	15.23%
Georgia	35.72%	30.54%	17.58%
Kentucky	9.95%	41.53%	22.84%
Mississippi	44.30%	47.09%	30.25%
North Carolina	29.89%	32.40%	15.56%
South Carolina	37.68%	33.91%	18.44%
Tennessee	20.89%	36.59%	18.84%

For additional explanations, please refer to Section 3 (Key Concepts and Terminology). The relative threshold values were derived from the 1990 Census of Population and Housing, Summary Tape File 3 (STF3) data.

***Note:** The table was developed for EPA by contractor Indus under EPA Contract Number 68-W7-0034. The relative threshold values above were derived using the 1990 Census of Population and Housing, Summary Tape File 3 (STF3) data. The minority threshold value is 1.2 times the average minority statistic within each state and the other columns represent the average low-income statistics within those states. The “15K” low-income threshold is 1.2 times the percent of households in the state with below \$15,000 income. The “Poverty” low-income threshold is 1.2 times the percent of households in the state meeting a Federal statistical poverty standard.*

## **5. GUIDELINES FOR ADDRESSING POTENTIAL EJ AREAS**

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The previous section outlines the process to identify potential EJ areas by utilizing the GIS analysis to determine the low-income and minority percentages and then comparing the percentages to the state averages. The activities addressed in this section and described in the appendices are essential to the mission of the EPA. Prior to implementing enforcement, permitting, or remediation activities, GIS demographics and low-income data must be obtained to make an EJ determination.

It is important to note that identification of a minority population or low-income population does not preclude a proposed agency action from going forward, nor does it necessarily compel a conclusion that a proposed action is environmentally unsatisfactory. Rather, the identification of such an effect should heighten agency attention to alternatives (including alternative sites), mitigation strategies, monitoring needs, and preferences expressed by the affected community.

### **A. Enforcement Activities (Refer to Appendix D for further details)**

EPA Region 4 enforcement personnel should ensure that potential EJ cases are prosecuted vigorously and expeditiously. On the basis of available scientific literature and experiences, there are identifiable potential EJ areas of concern that experience a certain type of double jeopardy in the sense they 1) experience higher levels of exposure to environmental stressors in terms of both frequency and magnitude; and 2) are less able to deal with these hazards as a result of limited knowledge of exposures and disenfranchisement from the political process. It is important to return violating facilities to compliance as quickly as possible.

In addition, as the case is prosecuted, the enforcement team should be certain to keep the community informed of developments and as practicable, should seek community input into the resolution of cases in an appropriate matter. Since every enforcement case is different, and the level of community interest will vary depending upon the case, there is no single technique for ensuring that community members are kept adequately informed and their views solicited.

Appendix D sets forth protocol for the enforcement team to consider in the initiation, prosecution and resolution of an enforcement matter in order to accomplish this enhanced community involvement. It provides a menu of ideas which can be employed to ensure that the Region meets its obligations under the Executive Order No. 12898 to carry out its activities so as to achieve the goal of EJ.

### **B. Permitting Activities (Refer to Appendix E for further details)**

This section provides permitting staff with guidance on how to consider EJ in the context of EPA-lead permitting decisions. Permitting decisions include new permits, permit modifications (except administrative modifications), and permit renewals. Following the steps outlined in Appendix E will help to ensure that the EPA's permitting decisions are consistent with Executive

Order No.12898, and that these decisions meet the minimum requirements identified by the Environmental Appeals Board (EAB).<sup>7</sup>

For State or Tribal-lead permitting matters, EPA permitting staff should encourage the States to consider EJ during their permitting process.<sup>8</sup> EPA and the State agency should seek heightened coordination with one another when a permitting action for a particular facility is perceived as posing disproportionately high and adverse human health or environmental effects on a potential EJ community.

The permit writers or reviewers should first request a GIS analysis to determine if the permit in question occurs in a potential EJ area of concern using the recommendations described in Sections 4 of this report.

### **C. Remediation Activities (Refer to Appendix F for further details)**

This section provides regional staff engaged in remedial, removal, site investigation and other non-permitting/non-enforcement activities [e.g., the annual state-based Performance Partnership Agreement (PPA) process, environmental impact statements under the National Environmental Policy Act (NEPA)] with general policy guidance on how to integrate EJ into these activities.

This section was not developed to address each and every EJ opportunity or situation that EPA staff may encounter; rather, its purpose is to establish an EJ framework for decision-making. In certain instances of cleanup or site remediation activities, those involving an immediate threat or actual endangerment to human health or the environment may require some deviation from this guidance. Some emergency situations, in which time is of the essence, may not present opportunities for high level of community involvement in environmental decision-making. In those instances, the high priority may be a timely community notification which triggers an evacuation. In the activities of NEPA, the scoping, and subsequent processes naturally lend themselves to having citizens in potential EJ areas of concerns fully participate in environmental decision-making on matters concerning impacts from construction and other projects. As for PPAs, this agreement lends itself to meaningful community involvement, as the EPA/state process is one of planning, dialogue and making annual environmental commitments.

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<sup>7</sup> One good bibliographic reference is the “Draft Memorandum on Integrating EJ into EPA Permitting Authority (7/18/96),” prepared by the Enforcement Subcommittee of the National Environmental Justice Advisory Council (NEJAC), which reports to the EPA Administrator (located at the NEJAC web site, <http://www.prcemi.com/nejac/publicat.html>).

<sup>8</sup> Title VI Guidance outlines the details for handling Title VI complaints against a federally funded agency, such as a State or Tribal government. Compliance with Title VI is mandatory. The outcome of a Title VI complaint filed by a citizen may include dismissal, mitigation (permit modification) or even the withholding of federal funding.

By following the steps outlined in Appendix F and being familiar with Appendix G (EJ and Community Involvement), staff can do their part to ensure that these kinds of activities are consistent with the Presidential Executive Order on EJ, No. 12898, as well as national EPA and regional EJ strategies and policies.

**D. Community Involvement Activities (Refer to Appendix F for further details)**

The purpose of this section is to provide EPA Region 4 guidance when assisting communities affected by environmental injustice. Whether it's a permitting, enforcement, remediation or other EPA activity, this protocol should be implemented in potential EJ areas of concern. For assistance, please be sure to contact the appropriate Divisional EJ Coordinator(s), Division EJ Liaisons, Tribal Coordinators (if appropriate). (Refer to Appendix H for a list of helpful contacts.)

This section will assist the "case team" in selecting the kinds of community involvement and outreach for the potential EJ area of concern. Becoming familiar with the outlined checklist in Appendix G is a very good start. The "Model Plan for Public Participation" publication by NEJAC supplements this checklist and can be obtained from the Region 4 EJ/CLP. (This also can be located at the NEJAC web site, under publications at <http://www.prcemi.com/nejac/publicat.html>.)