PROPOSED AMENDED RECORD OF DECISION

Captain's Cove Condominium
Operable Unit 1
Glen Cove, Nassau County, New York
Site Number 130032

March 2016

Prepared by the:

Division of Environmental Remediation
New York State Department of Environmental Conservation

PROPOSED RECORD OF DECISION AMENDMENT
CAPTAIN'S COVE CONDOMINIUM SITE

City of Glen Cove / Nassau County / Registry No.130032 March 2016

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Division of Environmental Remediation

SECTION 1: PURPOSE AND SUMMARY OF THE PROPOSED RECORD OF DECISION AMENDMENT

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), is proposing an amendment to the Record of Decision (ROD) for the above referenced site. The disposal of hazardous wastes at this site, as more fully described in the original ROD document and Section 6 of this document, has resulted in the contamination of various environmental media. The proposed amendment is intended to attain the remedial action objectives identified for this site for the protection of public health and the environment. This amendment identifies the new information which has led to this proposed amendment and discusses the reasons for the preferred remedy.

The Department has issued this document in accordance with the requirements of New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR) Part 375 Environmental Remediation Programs. This document is a summary of the information that can be found in the site-related reports and documents in the document repository identified below.

On March 29, 1999, the Department signed a ROD which selected a remedy to clean up the Captain's Cove Condominium Site. When the original ROD was issued, a land use category for restricted residential use was not available for consideration, therefore the ROD when issued contemplated commercial and industrial development. In 2004, the north shore of Glen Cove Creek, which includes the Captain's Cove property, was rezoned mixed use - restricted residential use. With the rezoning of the area, the City of Glen Cove requested the USEPA re-evaluate the Li Tungsten Site for restricted residential use including the areas adjacent to and comingled with the Captain's Cove site. In 2005, the USEPA issued an Explanation of Significant Difference allowing restricted residential use for all Li Tungsten Parcels and Areas with the exception of Parcel A which required further evaluation. The State concurred with the ESD allowing restricted residential use of the Li Tungsten Site with the exception of Parcel A. With the promulgation of new Part 375 regulations in 2006 that included the definition of the restricted residential land use category, the City of Glen Cove requested that the Department re-evaluate the Captain's Cove site for Restricted Residential use and provided additional site characterization data to facilitate the review. With the prior concurrence on the 2005 Li Tungsten ESD and based on the evaluation of the new data pertaining the nature and extent of contamination within the Site, the Department has determined that with the removal of the isolated pockets of residual contamination restricted residential use of the site is allowed.

Upon completion of the remedial elements contained herein, the Department will re-evaluate the classification of the site on the Registry of Inactive Hazardous Waste Disposal Sites.

SECTION 2: CITIZEN PARTICIPATION

The Department seeks input from the community on this proposed ROD Amendment. This is an opportunity for public participation in the remedy selection process. The information here is a summary of what can be found in greater detail in reports that have been placed in the Administrative Record for the site. The public is encouraged to review the reports and documents, which are available at the following repositories:

Glen Cove Library
4 Glen Cove Avenue
Glen Cove, NY 11542
M,T,W,TH: 9 AM to 9 PM
Sat: 9 AM to 5 PM
Sun: 1 PM to 5 PM

A public comment period has been set for March 8, 2016 to April 15, 2015 to provide an opportunity for you to comment on these proposed changes. A public meeting is scheduled for March 23, 2016 at Glen Cove City Hall beginning at 7 PM.

At the meeting, a description of the original ROD and the circumstances that have led to proposed changes in the ROD will be presented. After the presentation, a question and answer period will be held, during which you can submit verbal or written comments on the proposal. We encourage you to review this summary and attend the meeting.

Written comments may also be sent to:

Heide-Marie Dudek, Project Manager
NYS Dept. of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, NY 12233
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The Department may modify or reject the proposed changes based on new information or public comments. Therefore, the public is encouraged to review and comment on this proposal. Comments will be summarized and addressed in the responsiveness summary section of the final version of the ROD Amendment. This ROD Amendment is the Department's final selection of the remedy for the site.

Receive Site Citizen Participation Information By Email

Please note that the Department's Division of Environmental Remediation (DER) is "going paperless" relative to citizen participation information. The ultimate goal is to distribute citizen participation information about contaminated sites electronically by way of county email listservs. Information will be distributed for all sites that are being investigated and cleaned up in a particular county under the State Superfund Program, Environmental Restoration Program, Brownfield Cleanup Program, Voluntary Cleanup Program, and Resource Conservation and Recovery Act Program. We encourage the public to sign up for one or more county listservs at

http://www.dec.ny.gov/chemical/61092.html.

SECTION 3: SITE DESCRIPTION AND HISTORY

Location: The Captain's Cove Condominium site (Site) is located on Garvies Point Road in the City of Glen Cove. A site boundary modification was approved by the Department in March 2016 to incorporate areas of the Li Tungsten USEPA Superfund Site identified as Areas A, A', G and G' into the definition of the Captain's Cove State Superfund (Title 3) Site. The site is located along Glen Cove Creek. Operable Unit 1 (OU1) which is the subject of this document, includes original Title 3 remedial area (excluding that portion encompassed under Ferry Terminal lot) and Li Tungsten OU2 Areas A and A'. (see Figure 1)

Site Features and Current Zoning and Land Use: The site has been cleared of all buildings and foundations and now the City of Glen Cove is currently constructing a Ferry Terminal on the eastern portion of the site which includes the Li Tungsten Areas G and G'. The Ferry Terminal portion of the site is zoned commercial, while the remaining area has been zoned mixed use for restricted residential development.

Past Use of the Site: Historically, the site was used recreationally for boating, fishing, and swimming. Starting in the 1950's a portion of the site turned into a community dump. Municipal wastes, such as garbage, street debris, and yard waste, along with incinerator residues, wastewater treatment plant sludges, construction and demolition (C&D) debris, hazardous wastes including spent solvents, printing wastes, drums, and Li Tungsten mill tailings were dumped on the site. Disposal continued into the early 1980's. From the 1930's through 1965 the redefined site, the exception of the western end, was also used for the disposal of materials dredged from Glen Cove Creek.

Due to interest in the 1980's in redeveloping the Glen Cove Creek area, the site was the focus of several environmental investigations. These investigations identified metals in the soil exceeding background concentrations. On January 7, 1986, the NYSDEC placed the Captain's Cove Site on the New York State Registry of Inactive Hazardous Waste Disposal Sites (Registry) as a Class 2A site. The site classification was subsequently changed to Class 2 indicating substantial threat to human health or the environment.

The City of Glen Cove, the site owner at the time (Village Green Realty) wastes were placed, signed a Consent Order to perform a Title 3 remedial program to address the hazardous waste disposal. Subsequent to signing the Consent Order, Village Green Realty declared bankruptcy. The City of Glen Cove completed the work under the Consent Order. A Remedial Investigation and Feasibility Study were completed in 1999 with the Record of Decision requiring the excavation of waste to industrial/commercial standards signed in March 1999. The City of Glen Cove completed the Remedial Action in 2001.

During the Title 3 Remedial Investigation of the Captains Cove site, the City of Glen Cove identified radiological and metal contamination associated with the Li Tungsten site. The USEPA issued a Record of Decision for the Li Tungsten Operable Unit 2 in 1999 requiring the excavation of the contamination. The USEPA completed the work at Captain's Cove Condominium site in 2006.

In 2009, the City of Glen Cove received Federal Stimulus money to begin the construction of a high speed ferry terminal on the eastern portion of the site. Construction of the new ferry terminal began in 2010 and is scheduled for completion in 2016.

Subsequent to the construction of the Ferry Terminal foundation, a site boundary modification was prepared to better define the overall Captain's Cove Site and to clarify that the Li Tungsten's Areas A, A', G and G' which overlap part of the original Title 3 remediation area are included.

Site Geology and Hydrogeology: The Site is located along the northern shore of Glen Cove Creek. Soils observed at the site are similar to those observed throughout the Garvies Point Road area, the vadose zone consists of silt or silt and fine grained sand, while the saturated zone consists of sand underlain by an extensive and thick peat layer with a clay layer beneath it (observed off-site at 12- to 16-feet below ground surface).

Groundwater, which varies with tidal cycles, was encountered at the site between 7 and 10-feet below ground surface. Regional groundwater flow is in a southerly direction towards Glen Cove Creek.

Operable Units (OU): OU1: is the original NYSDEC Title 3 Area and Li Tungsten OU2 Areas A and A'. OU2 is defined as all areas of the Captain's Cove Site outside of the original Li Tungsten and Captain's Cove remedial areas. OU3 is the Ferry Terminal Area, which includes a small portion of the original Title 3 Area and Li Tungsten OU2 Areas G and G'.

OU1 is the subject of this document. A site location map is attached as Figure 1.

The Department intends to issue a separate Record of Decision for OU2 and OU3.

SECTION 4: LAND USE AND PHYSICAL SETTING

The Department may consider the current, intended, and reasonably anticipated future land use of the site and its surroundings when evaluating a remedy for soil remediation. The Captain's Cove Site is currently zoned for restricted residential use.

SECTION 5: ENFORCEMENT STATUS

Potentially Responsible Parties (PRPs) are those who may be legally liable for contamination at a site. This may include past or present owners and operators, waste generators, and haulers.

The PRPs for the site, documented to date, include:

City of Glen Cove
Village Green Realty at Garvies Point, Inc.
Old Court Savings & Loan (In Receivership)
AGI-VR/Wesson Company;
Adams Carbide Corporation;
Alloy Carbide Company;
Chi Mei Corporation;
Climax Molybdenum Company;

Climax Molybdenum Marketing Corporation;
County Of Nassau, New York;
Cyprus Amax Minerals Company;
General Electric Company;
GTE Corporation;
H.C. Starck, Inc.;
Kennametal Inc.;
Kulite Tungsten Corporation:
M & R Industries, Inc.;
Minmetals Inc. /China National Metals and Minerals Import And Export Corporation;
OSRAM Sylvania Incorporated;
Philips Electronics North America Corporation;
Sandvik AB;
TDY Holdings, LLC;
TDY Industries, Inc.;
United States Department of Defense;
United States Department of the Treasury;
United States General Services Administration

On March 18, 1997, the City of Glen Cove (the site owner at the time wastes were placed), Village Green Realty at Garvies Point, Inc. (the then owner) and Old Court Savings & Loan (In Receivership) signed a Consent Order to perform a Title 3 RI/FS to address the hazardous waste disposal. Subsequent to signing the Consent Order, Village Green Realty at Garvies Point, Inc. declared bankruptcy. The City of Glen Cove completed the work under the Consent Order.

SECTION 6: SITE CONTAMINATION

6.1: Summary of Environmental Assessment

This section summarizes the assessment of existing and potential future environmental impacts presented by the site. Environmental impacts may include existing and potential future exposure pathways to fish and wildlife receptors, wetlands, groundwater resources, and surface water.

The Fish and Wildlife Resources Impact Analysis (FWRIA) for OU 01, which is included in the 1999 Captain's Cove RI report, presents a detailed discussion of the existing and potential impacts from the site to fish and wildlife receptors.

Soils: The recent investigations have identified isolated pockets of metals contamination exceeding the site-specific excavation criteria established for the site for lead and arsenic to address the potential for these metals to migrate or leach to the groundwater. Contaminants of concern in the soil include arsenic, lead, radium-226 and thorium-232.

Groundwater: In accordance with the original Captain's Cove and Li Tungsten RODs, groundwater monitoring has continued to evaluate groundwater attenuation for semi volatile organic compounds (SVOCs) and metals. Although, the SVOCs 2-methylnatphalene, acenapthalene, fluorine, naphthalene, and phenanthrene and volatile organic compound (VOC) chlorobenzene continue to be detected above the site SCGs, overall concentrations continue to decrease. The additional VOCs detected are indicative of a petroleum spill located near the north-western section of OU2. Metals however have not shown expected reductions leading to the development of the site-specific excavation criteria.

6.2: Interim Remedial Measures

There were no IRMs performed at this site during the RI.

6.3: Summary of Human Exposure Pathways

This human exposure assessment identifies ways in which people may be exposed to site-related contaminants. Chemicals can enter the body through three major pathways (breathing, touching or swallowing). This is referred to as *exposure.*

People may come into contact with contaminants in soils in OU-1 and OU-2 by walking on the site, digging or otherwise disturbing the soils. Measures are in place to prevent contact with residual soil contamination in OU-3. People are not drinking the contaminated groundwater because the area is served by a public water supply not affected by this site. Volatile organic compounds in the groundwater may move into the soil vapor (air spaces within the soil), which in turn may move into overlying buildings and affect the indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. Because the site is vacant, the inhalation of site-related contaminants due to soil vapor intrusion does not represent a current concern. The potential exists for people to inhale site contaminants for any future on-site redevelopment or occupancy.

SECTION 7: SUMMARY OF ORIGINAL REMEDY AND PROPOSED AMENDMENT

7.1: Original Remedy – Completed March 2004

Landfill Reclamation and Deed Restriction. This remedy consisted of excavating the landfill and separating the waste stream into various components including: solid waste, hazardous waste, construction and demolition (C&D) debris, and radiological waste. The latter three waste streams were disposed of offsite. The solid waste was sorted according to size and the smaller material (less than 1 inch in diameter) returned to the excavation if appropriate after analysis. All of the residual waste returned to the excavation were covered by two feet of clean soil or other suitable cover material. The larger material (greater than1 inch) was disposed of offsite in a solid waste landfill. A Groundwater monitoring program is currently in place.

The original remedy was designed to allow commercial and industrial development, residential (single family housing) development was prohibited.

7.2 New Information

When the original ROD was issued, a land use category for restricted residential use was not available for consideration, therefore the ROD when issued contemplated commercial and industrial development. In 2004, the north shore of Glen Cove Creek, which includes the Captain's Cove property, was rezoned mixed use - restricted residential use. With the rezoning of the area, the City of Glen Cove requested the USEPA re-evaluate the Li Tungsten Site for restricted residential use including the areas adjacent to and comingled with the Captain's Cove site. In 2005, the USEPA issued an Explanation of Significant Difference (ESD) allowing restricted residential use for all Li Tungsten Parcels and Areas with the exception of Parcel A which required further evaluation. The State concurred with the ESD allowing restricted residential use of the Li Tungsten Site with the exception

of Parcel A. With the promulgation of new Part 375 regulations in 2006 that included the definition of the restricted residential land use category, the City of Glen Cove requested that the Department re-evaluate the Captain's Cove site for Restricted Residential use and provided additional site characterization data to facilitate the review. With the prior concurrence on the 2005 Li Tungsten ESD and based on the evaluation of the new data pertaining the nature and extent of contamination within the Site, the Department has determined that with the removal of the isolated pockets of residual contamination restricted residential use of the site is allowed.

After the DEC and EPA RODs were implemented, additional soil and groundwater samples were collected throughout the Site, in anticipation of redevelopment. This sampling indicates:

- Significant areas of gross contamination were not identified within the redefined site.
- Isolated areas of elevated contaminants at levels which would continue to impact groundwater have been identified on the site.
- Implementation of groundwater monitoring required by the ROD remedies identified that the prior waste removals had not achieved the improvements to onsite groundwater anticipated by the original RODs. Groundwater monitoring will be continued to assess effectiveness of the additional soil removal.

The Pre-Construction Investigation (PCI) soil data indicate that no significant areas of gross contamination exist within redefined site. However, isolated pockets of elevated metals contamination were noted in the soil at levels which could impact groundwater. Groundwater monitoring as part of the original remedy and the PCI noted that while VOC and SVOC groundwater contamination continues to decline, metals contamination has not shown the expected reductions. Therefore, to evaluate the potential impact that the isolated pockets may have on groundwater, a site-specific evaluation of the potential of arsenic and lead migration (leaching) to the groundwater was performed. The evaluation calculated the site-specific partition coefficient (Kd) for arsenic and lead using leachate test data collected at the site. Utilizing the Kd and the methodology outlined in the NYSDEC *Development of Soil Cleanup Objectives Technical Support Document* September 2006, site-specific excavation criteria were developed to mitigate the potential of arsenic and lead to leach to groundwater. The methodology presented in the Technical Support Document utilizes the site-specific Kd with a Dilution Attenuation Factor (DAF). The DAF is representative of the five mechanisms that occur during contaminant transport from the soil to the groundwater. However, because two of the mechanisms (volatilization and sorption/desorption) in general do not apply to inorganic compounds, the DAF presented in the Technical Support Document was modified reducing it from 100 to 60 to account for only the remaining three mechanisms (leaching and diffusion, transformation and degradation, and change in concentration of contaminants after reaching and/or mixing with the groundwater surface). Therefore, utilizing the DAF of 60 and the site-specific Kd value for arsenic and lead, the arsenic and lead site specific excavation criteria to protect groundwater are 175 parts per million (ppm) and 660 ppm, respectively.

Based on the findings of the Pre-Construction Investigation, metals contamination attributed to the Li Tungsten and Captain's Cove OU1 site was found in isolated locations exceeding the excavation criteria.

While data collected to date indicates that there is no evidence of significant residual radiological contamination left onsite, based on the historical documentation of contamination at the site, the excavation criteria for radium-226 and thorium-232 will be the soil cleanup objectives as outlined in the USEPA Li Tungsten 2005 Explanation of Difference.

7.3: Remedial Goals

The objectives for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375. The goal for the remedial program is to restore the site to pre-disposal conditions to the extent feasible. At a minimum, the remedy shall eliminate or mitigate all significant threats to public health and the environment presented by the contamination identified at the site through the proper application of scientific and engineering principles.

Based on the Pre-Design Data the Remedial Action Objectives (RAOs) for the site are:

Groundwater

RAOs for Public Health Protection

- Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards.
- Prevent contact with, or inhalation of volatiles, from contaminated groundwater.

RAOs for Environmental Protection

- Restore groundwater aquifer to pre-disposal/pre-release conditions, to the extent practicable
- Remove the source of groundwater or surface water contamination

Soil

RAOs for Public Health Protection

- Prevent ingestion/direct contact with contaminated soil.

RAOs for Environmental Protection

- Prevent migration of contaminants that would result in groundwater or surface water contamination.

Soil Vapor

RAOs for Public Health Protection

- Mitigate impact to public health resulting from existing, or the potential for, soil vapor intrusion into buildings at a site.

SECTION 8: PROPOSED AMENDED REMEDY

The Department is proposing to amend the Record of Decision (ROD) for the Captain's Cove Site. To be selected, the remedy must be protective of human health and the environment, be cost-effective, comply with other statutory requirements, and utilize permanent solutions, alternative technologies or resource recovery technologies to the maximum extent practicable. The remedy must also attain the remedial action objectives identified for the site, which are presented in Section 7.3.

The proposed remedy is referred to as the Excavation and Backfill remedy and is similar in concept to the remedy evaluated by the Feasibility Study undertaken for the original 1999 ROD. This remedy is simply an upgrade to require site-specific soil excavation levels necessary to achieve groundwater standards, as well as to revise the soil cover to the standards identified to allow restricted residential use for the redefined site.

The elements of the proposed remedy are as follows:

1. Remedial Design: A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follow:

    - Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
    - Reducing direct and indirect greenhouse gases and other emissions;
    - Increasing energy efficiency and minimizing use of non-renewable energy;
    - Conserving and efficiently managing resources and materials;
    - Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;
    - Maximizing habitat value and creating habitat when possible;
    - Fostering green and healthy communities and working landscapes which balance ecological, economic and social goals; and
    - Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.

2. Excavation: Excavation and off-site disposal of soil delineated by the PCI or during development which concentrations of the following contaminants, above these site specific removal criteria:
    - Arsenic above 175 parts per million (ppm);
    - Lead above 660 ppm;
    - Radium-226 above 5pCi/g (not including the natural background radiation of nuclide of approximately 1pCi/g)
    - Thorium-232 above 5pCi/g (not including the natural background radiation of nuclide of approximately 1pCi/g)

    In addition to soil exceeding the above criteria, soil or waste meeting the following definitions will also be excavated and disposed when identified during development:
    - Grossly contaminated soil, as defined by 6NYCCR Part 375-1.2(u); and
    - Non-aqueous phase liquid, as defined by 6NYCCR Part 375-1.2(ac).

    Soil from the site which does not exceed the site-specific excavation criteria may be used to backfill the excavation below the cover system described in remedy element 2, to the extent that sufficient volume of on-site is available. As needed, clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to complete the backfilling of the excavation and establish the designed grades and the site will be graded to accommodate installation of a cover system as described in remedy element 3.

3. Cover System: A site cover will be required to allow for restricted residential use of the site. The cover will consist either of the structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper two feet of exposed surface soil will exceed the restricted residential SCOs. Where the soil cover is required, it will be a minimum of two feet of soil placed over a demarcation layer, with the upper six inches of

soil of sufficient quality to maintain a vegetative layer. Soil cover material, including any fill material brought to the site, will meet the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d).

4. Institutional Control: Establish an institutional control in the form of an environmental easement for the controlled property which will: (a) require the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3); (b) allow the use and development of the controlled property for restricted residential as defined by Part 375-1.8(g), although land use is subject to local zoning laws; (c) restrict the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County DOH ; and (d) require compliance with the Department approved Site Management Plan.

5. Site Management: Require a Site Management Plan, which includes the following:
   - an Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective:
     - Institutional Controls: The environmental easement discussed in element 4 above.
     - Engineering Controls: The soil cover listed above in element 3.

   - Any remaining contamination and the depth of contamination that will be managed under the SMP Plan will be delineated on a Site Plan/Survey

   - This plan includes, but may not be limited to:

     1. An excavation plan which details the provisions for management for future excavations of remaining contamination. Details shall include, but are not limited to:
        a. All soil disturbed during redevelopment or site management will need to be handled in accordance to the approved excavation plan.
        b. all soil excavated during development that exceeds the removal criteria defined in element 1 above must be disposed of offsite at an appropriate facility.
        c. All excavated material that will be used onsite must be sampled in accordance with DER 10 for Backfill.

     2. A provision, should redevelopment occur, to ensure no soil exceeding protection of groundwater concentrations as defined in Part 375.6.8 (b) will remain below storm water retention basin or infiltration structures

     3. A provision for evaluation of the potential for soil vapor intrusion in future buildings developed onsite, including provision for implementing actions recommended to address exposures related to soil vapor intrusion.

     4. A provision for the management and inspection of the identified engineering controls;

5. Maintaining site access controls and Department notification;

6. The steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.

7. Descriptions of the provisions of the environmental easement including any land use and/or groundwater use restrictions.

8. A monitoring Plan to assess the performance and effectives of the remedy. The plan includes, but may not be limited to:
   i. Monitoring of groundwater to assess the performance and effectiveness of the remedy;
   ii. A schedule of monitoring and frequency of submittals to the Department;
   iii. Monitoring for vapor intrusion for any occupied existing or future buildings developed on the site, as may be required by the Institutional and Engineering Control Plan discussed above.

SECTION 9: NEXT STEPS

As described above, there will be a public meeting and comment period on the proposed changes to the selected remedy. At the close of the comment period, the Department will evaluate the comments received and prepare a responsiveness summary which will be made available to the public. A notice describing the Department's final decision will be sent to all persons on the site mailing list.

If you have questions or need additional information you may contact any of the following:

Project Related Questions
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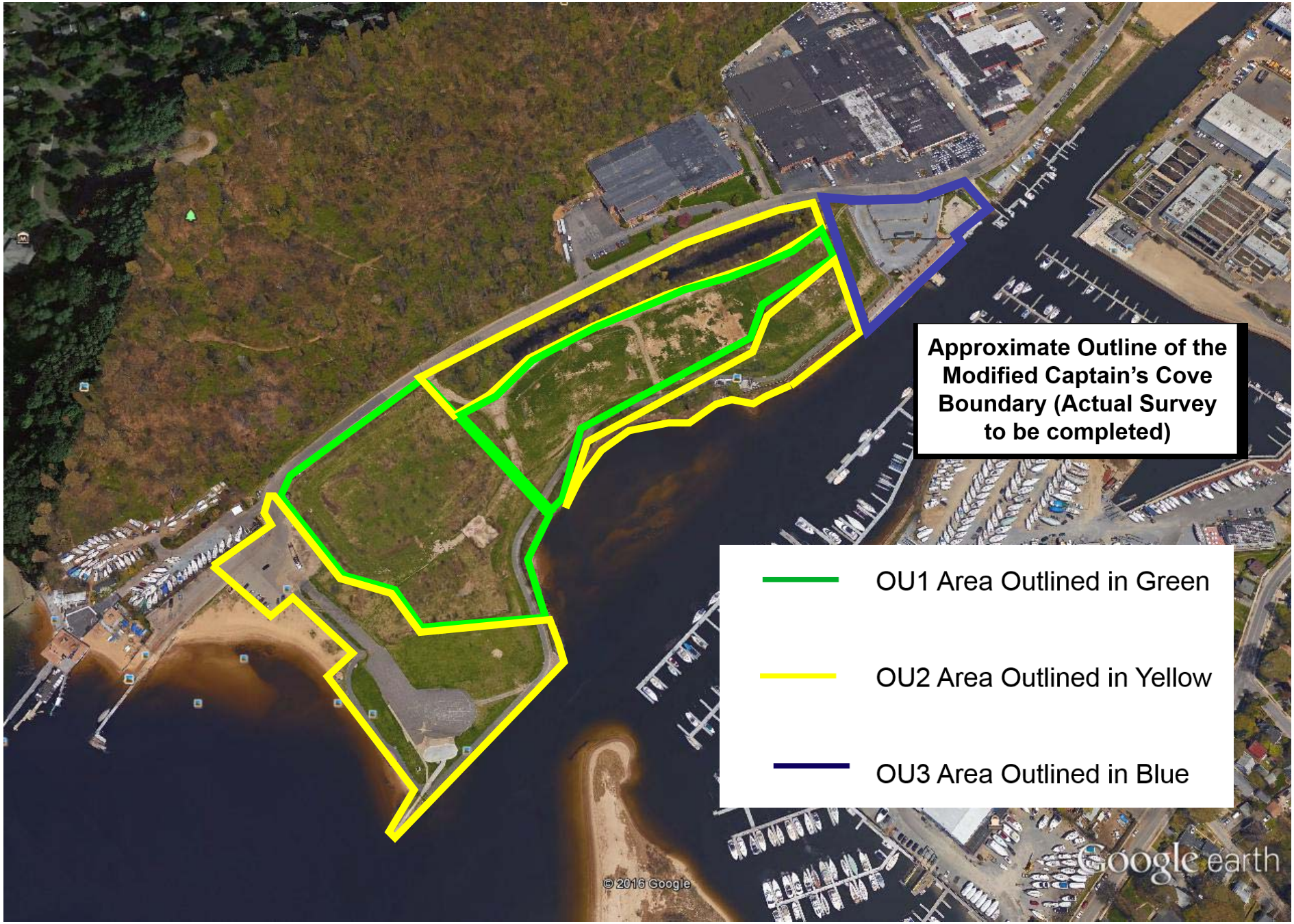

Google earth

feet 1000

meters 400

Figure 1: OU1 Site Boundary