

APPENDIX C

Community Relations Plan for Remedial Action at the
Fulton Terminals Site;
Clothier Site; and
Voleny Landfill Site
Oswego County, New York

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INTRODUCTION

This community relations plan (CRP) discusses the previous and current involvement of the public with the Fulton Terminals, Clothier, and Volney Landfill Sites in Oswego County. This plan outlines the objectives and techniques recommended for the Community Relations Program. Also included is a schedule and a preliminary list of interested parties.

The plan is based on information obtained from file documents of the USEPA Region II office in New York City and the NYSDEC office in Liverpool and Albany. Alterations to the plan may be necessary as additional information is gathered about the site and the communities' concerns and interest.

As the investigation progresses, the community relations plan will be tailored to parallel the technical investigation and community interest.

BACKGROUND AND COMMUNITY RELATIONS HISTORY

Site History

The Pollution Abatement Services (PAS) of Oswego is an inactive hazardous waste site occupying about 15 acres of land immediately east of the City of Oswego, New York. This main P.A.S. site has been a major topic of public concern and is being remediated through a separate Cooperative Agreement between the USEPA and the NYS Department of Environmental Conservation. During operation of the main site, wastes were taken off site and suspected of being illegally disposed at the following inactive hazardous waste sites:

Fulton Terminals Site, Fulton (T), Oswego County

Clothier Site, Granby (T), Oswego County

Volney Landfill, Volney (T), Oswego County

These sites are all located in relatively secluded, however, sometimes well-traveled areas. While community members in the general area are knowledgeable and experienced in the field of hazardous wastes and recognize that the sites are suspected of containing wastes from Pollution Abatement Services of Oswego, the communities have not organized and become involved with the sites. A local official in Fulton predicted in relation to the Fulton Terminal Site that, while residents will be interested in site activities, they will be relieved to see progress taking place. He also stated that he would be surprised if the community reacts with alarm to site work.

While the community has evidenced a low level of involvement with these sites, activity by public officials and the media has been higher. Local media have been actively interested in the sites. Partial remediation has taken place at one or more of the sites. During the remediation, the work was followed regularly in the press, and the local citizens were kept up to date with progress. The press reassured the people that there was no health hazard from the site. A local official in the Fulton area characterized the media in the area as being accurate and had noted that articles are not written in such a way that they alarm the community. Local officials seem to have a good working relationship with the press.

Although community interest in the sites is presently low, the sites are located in areas which will generate interest when work begins. Due to site locations, much site work will be open to observation by the public. For this reason, the general community should be well-briefed on site plans via the media before actual work begins. In this way, they will understand why workers in protective clothing are on specific sites and residents will not become alarmed.

ISSUES AND CONCERNS

The few concerns that have been voiced have been general in nature. These general concerns are runoff water from the Fulton Terminals Site discharging into the Oswego River and the potential for contaminating private water supplies at the various sites.

Community members may be concerned because these sites are presently unsecured, allowing anyone entering the area to come in contact with contaminated soil.

COMMUNITY RELATIONS OBJECTIVES

The following objectives are recommended for the community relations program at the sites:

- To establish effective communication with local officials and provide them with information on site activities before such information is released to the press so that they may respond knowledgeably to citizen concerns.
- To promote effective communication with members of the community and provide them with information on site plans and progress.
- To encourage effective communication with representatives of the media and to foster media participation with community information.
- To provide opportunities for community members to contribute input on site activities and to comment on remedial alternatives.

COMMUNITY RELATIONS TECHNIQUES

The following techniques are recommended for meeting the objectives:

<u>OBJECTIVE</u>	<u>TECHNIQUE</u>
To establish effective communication with local officials and provide them with information on site activities before such information is released to the press.	<ul style="list-style-type: none">- Conduct briefings of local official.- Issue fact sheets.
To promote effective communications with members of the community and provide them with information on site plans and progress.	<ul style="list-style-type: none">- Establish an information repository in a designated area.- Issue Fact Sheets.- Issue press releases.
To encourage effective communications with representatives of the media and to foster media participation with community information.	<ul style="list-style-type: none">- Establish contact with media representatives and provide them with contact telephone numbers and a press kit before onset of site work.- Issue press releases.- Encourage media representatives to provide sufficient coverage of site activities to prevent undue community concerns.
To provide opportunities for community members to contribute input on site activities and to comment on remedial alternatives.	<ul style="list-style-type: none">- Conduct public meeting.

INTERESTED PARTIES

Local Officials

Vernon Dorhan
Mayor
City of Fulton
East First Street
Fulton, NY 13069

Evan Walsh
Senior Public Health Sanitarian
Oswego County Health Department
70 Bronner Street
Oswego, NY 13126
315-349-3260

Oswego County Environmental Management Council
c/o County Planning Department
46 East Bridge
Oswego, NY 13126

Paul Kimball, Volney Town Supervisor
RD #4
Fulton, NY 13069
315-593-8288

Paul S. Malone, Granby Town Supervisor
RD #7
Box 126
Fulton, NY 13069
315-593-6920

Federal Officials

Senator Daniel Patrick Moynihan
442 Russell Building
Washington, D.C. 20510
(202) 224-4451

Home Office
22 Watkins Avenue
Oneonta, NY 13820
(607) 443-2310

Senator Alfonse M. D'Amato
321 Russell Building
Washington, D.C. 20510

Federal Officials (cont'd)

Home Office
Room 1259 Federal Building
100 S. Clinton Street
Syracuse, NY 13260
(315) 423-5471

Representative Frank Horton
2229 Rayburn House Office Building
Independence Avenue, S.E.
Washington, D.C. 20515

Home Office
Riverfront Building
Oswego, NY 13126
(315) 342-4688

Lillian Johnson
Office of Public Affairs
USEPA
(212) 264-4534

Media

The Messenger
9E. Genessee Blvd.
Syracuse, NY
(315) 635-3921

Syracuse Herald Journal
Clinton Square
P.O. Box 4915
Syracuse, NY 13221
(315) 470-0011
Contact: Walter Wasilewski

Post Standard
Clinton Square
Syracuse, NY 13221
(315) 470-0011
Contact: Julie Harrison Blissert

Syracuse New Times
406 S. Franklin
Syracuse, NY
(315) 442-7011

Fulton Patriot
186 South First Street
Fulton, NY 13069

Oswego Valley News
108 N. 7th Street
Fulton, NY 13069

Palladium Times
140 West First Street
Oswego, NY

Messenger
51 East Third Street
Oswego, NY

WCNY-TV Channel 24
506 Old Liverpool Road
Liverpool, NY
(315) 457-0440

WSTM-TV Channel 3
1030 James Street
Syracuse, NY
(315) 474-5000

WTVH-TV Channel 5
980 James Street
Syracuse, NY
(315) 425-5555

Administrative 3
Record

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II
26 Federal Plaza
New York, New York 10278

CERTIFIED MAIL:
RETURN RECEIPT REQUESTED

Re: Fulton Terminals Site; Fulton, New York
Clothier Site; Grandy, New York
Volney Landfill; Volney, New York

Dear Sir or Madam:

The United States Environmental Protection Agency ("EPA") and the New York State Department of Environmental Conservation ("DEC") have executed a Cooperative Agreement whereby EPA has agreed to provide funds to DEC to investigate the release and/or threatened release of hazardous substances at the above-referenced sites. EPA intends to spend additional public funds on any further investigative and corrective measures necessary to control such releases and/or threatened releases from these sites. Unless EPA determines that a responsible party will properly perform such action, EPA intends to do so pursuant to applicable provisions of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. Section 9601 et seq.

Under section 107(a) of CERCLA and other laws, responsible parties may be liable for any costs incurred by the government in conducting studies and taking corrective actions at the site. Such costs may include but need not be limited to expenditures for investigation, planning, cleanup of the site and enforcement. By this letter, EPA notifies you of your potential liability with regard to this matter and encourages you, as a potentially responsible party, to undertake voluntary cleanup activities.

Responsible parties under CERCLA include current and past owners or operators and persons who generated the hazardous substances or were involved in the transport, treatment, or disposal of them. Based on information available to us, EPA believes that you may be a responsible party.

DEC is scheduled to conduct the following studies at the above-referenced sites:

1. A remedial investigation to identify the nature and extent of the release and/or threatened release. The goals of this investigation include:
 - a) identification of local hydrogeological characteristics to evaluate groundwater quality and movement in the vicinity of the site;
 - b) determination of the extent of soil, air and surface water contamination at the site.
2. Feasibility studies to evaluate possible remedial actions to remove or contain hazardous substances at the site.

DEC will proceed with the above studies unless one or more of the potentially responsible parties indicate their willingness to conduct these studies themselves.

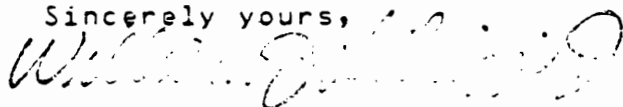
You have already received, or will receive shortly, a letter from the New York State Department of Law ("Demand Letter") requesting that you notify Assistant Attorney General David A. Munro, in writing, by no later than March 15, 1985, of your willingness to undertake the above-mentioned studies and other necessary corrective measures at the above-referenced sites and at the others listed in the Demand letter and alleged by EPA and DEC to be related to the above-referenced sites. Your response to the Demand letter shall also constitute a response to this letter. A copy of response is to be forwarded to:

Morris Trichon
Site Investigation Compliance Branch
U.S. Environmental Protection Agency
26 Federal Plaza Room 402
New York, New York 10278

In the absence of any response to the Demand Letter, EPA will assume that you decline to voluntarily undertake the studies and corrective measures and the Agency will proceed with any such activities as it deems necessary.

If you need additional information regarding the above, you can reach Mr. Trichon by telephone at 212-264-2110.

Sincerely yours,



William J. Librizzi, Director
Emergency and Remedial Response Division

cc: Norman Nosenchuck, P.E.
Director, Division of Solid Waste
NYS Department of Environmental Conservation

*Landfill
Oswego County → copy for your files
D.H.*

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STATE OF NEW YORK : DEPARTMENT OF ENVIRONMENTAL CONSERVATION
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In the matter of Alleged Violations of Title 7 of Article 27 of the Environmental Conservation Law and Section 360.8(a)(3) of Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York by

CONSENT
ORDER

CASE NO.
7-0170

COUNTY OF OSWEGO
Oswego Valley Landfill
Volney (T), Oswego County,

Respondent.

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The Department of Environmental Conservation (hereinafter referred to as "Department") alleging violations of Title 7 of Article 27 of the Environmental Conservation Law and Section 360.8(a)(3) of Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York by the County of Oswego (hereinafter referred to as "Respondent") in regards to its Landfill operations in the Town of Volney, and alleging it is in contravention of groundwater quality standards established by the Department, and

Respondent, to promote the best interests of the parties, having affirmatively waived its rights to a hearing herein as provided by law, and consenting to the issuing and entering of this Order, and agreeing to be bound by the provisions, terms and conditions contained herein,

NOW, having considered this matter, and being duly advised, IT IS ORDERED THAT the Respondent shall, on or before June 15, 1979, take the following actions:

1. As to groundwater monitoring studies:

- a) Identify all on-site monitoring wells that are useable.

Determine which wells, if any, need replacement and submit plans for their replacement.

- b) Define the direction of leachate migration.

- c) Sample all monitoring wells and residential wells (within 500 feet) of the site in accordance with the December 30, 1975 Approval to Construct a Solid Waste Management Facility.

- d) Additional monitoring for other parameters should be sampled for annually. These analyses should include phenols, PCBs, total organic carbons (TOC), total halogenated organics and cyanide. These analyses will be evaluated annually to determine future monitoring needs.

2. As to evaluation of leachate treatment:

- a) Evaluate the existing leachate collection and treatment method.

- b) Evaluate alternate leachate collection and treatment methods.

3. As to sludges:

- a) Quantify and qualify all sludges being disposed of at the landfill.

- b) Evaluate existing and alternative on-site sludge disposal methods.
4. As to a closure plan:
- a) Develop a closure plan which provides for long-term leachate management. The closure plan should consider and be based upon estimated leachate flows from a water balance method such as EPA Bulletin SW-168, Use of the Water Balance Method for Predicting Leachate Generation from Solid Waste Disposal Sites, dated October, 1975.

DATED: Liverpool, New York
March 14, 1979

ROBERT F. FLACKE, COMMISSIONER
New York State Department of
Environmental Conservation

BY


WILLIAM A. HICKS
Regional Director

TO: The Honorable Herbert Van Schaack
Chairman, Oswego County Legislature
County Building
Oswego, New York 13126

CONSENT BY RESPONDENT

Respondent hereby consents to the issuing and entering of the foregoing Order without further notice and waives its rights to a hearing herein and agrees to be bound by the provisions, terms and conditions contained therein.

COUNTY OF OSWEGO

BY Arthur Ospelt

TITLE Oswego County Highway Superintendent

DATE May 4, 1979

CORPORATE ACKNOWLEDGEMENT

STATE OF NEW YORK)
COUNTY OF OSWEGO) SS:

On this 4th day of May, 1979, before me personally came Arthur Ospelt to me known, who being by me duly sworn, did depose and state that he resides at Town of Schroepel that he is the Highway Superintendent of the County of Oswego, the corporation described in and which executed the foregoing instrument, and that he signed his name as authorized by said corporation.

Robert Kessler
NOTARY PUBLIC