



Form for Submitting Comments on the Onondaga Lake Proposed Plan

Your input on the Proposed Plan for the Onondaga Lake subsite of the Onondaga Lake Superfund site is important to NYSDEC. Comments provided by the public are valuable in helping us select a final cleanup remedy for the site.

You may use the space below to write your comments. Use additional pages if needed. Fold the form along the dotted lines and tape (do not staple) the form closed. The return address is already printed on the reverse side. Comments must be postmarked by March 1, 2005. Those with electronic communications capabilities may submit their comments to NYSDEC via the Internet at the following e-mail address: DERweb@gw.dec.state.ny.us. Please note "Onondaga Lake Proposed Plan" in the subject box.

1. ENDOW THE LAKE WITH A "LAKEKEEPER" STAFF ▲ 1
TO FOLLOW PROGRESS @ SITE, SOME WITH
TECHNICAL PROFESSIONALISM & w/ A VOICE
& SOME AUTHORITY TO TEST/LAB PROGRESS
≅> OWNERSHIP RESPONSIBILITIES @ HAND,

2. MODEL THE LAKE SHORES/^{AREAS} TO DEFINE 2
CANDIDATES FOR CLASS B+ A- WATERS
POSSIBLY INVOLVING BOTTOM CONTOURING TO
CAPTURE FRESHWATER TRIBUTARY WATERS
EVEN POSSIBLY WITH GRIB LIKE CONTAINMENT
FOR FLOW THROTTLING (~LEVEES).

3. DO BETTER AT
GEOREFERENCE OF ALL (PERTINENT) SCIENCE (REF.) & 3
PLANNED ENGINEERING FOR BROKENDOWN FOCIS
TO SHORTEN BODY OF PAPER TRAIL & LEARNING CURVE
FOR LAKE KEEPER'S BOTTOM WORKERS 2006-2020.

NAME "ONONDAGA LAKE (REMEDIATION SCIENCE) CENTER" ~~SITE~~
▲ Suggest 5-7 staff including ~4 PERMANENT PART TIME = 2FT.
+ 3 " FULL TIME

COST @ \$50,000 x 5 FULL TIME EQUIV. = \$250K/YR
+ EQPMNT + BOAT LEASE + BLDG = 100K/YR

ALSO COULD BE ENDOWED & USE SUNY-ESF INTERNS √ \$350K/YR
OR LESS

Your Name
Address
City
State
Zip
Phone

THOMAS E. LAW Signed
152 CHATHAM RD
SYRACUSE
NY
13203
315-478-3305
DATE: THURSDAY
JANUARY 6, 2005

Dear Messrs. Hester and Larson,

As long as I remember discussion about the Onondaga Lake clean-up, I remember discussion about a trail around the lake. Why is this no longer a priority when the general public seems to be in so much favor of it? When you consider the cost of cleaning the lake, this project would require very few dollars, and it would add to the benefit of cleansing the lake. During these times when people are more conscientious about their health, and the need to experience more physical activity (as opposed to television, spectator sports, computers, occupations that do not require manual labor, driving vehicles, etc.), why not add to the possibilities to bring people out-of-doors to hike, bike, etc? To link such a trail to the Creekwalk would open such possibilities to the locus of population in the City of Syracuse and more distant places.

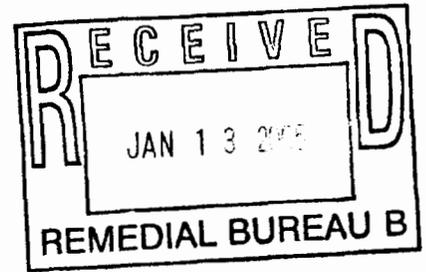
I hope that your decisions in the future will look upon this goal favorably and so reflect the will of the people.

Sincerely,
Richard J. Lightcap

February 18, 2005

Robert Marquardt
1226 James Street
Syracuse, New York 13203

January 8, 2005



Donald Hesler/Tim Larson
Onondaga Lake Superfund Site
Public Comment
NYSDEC
625 Broadway
Albany, New York 12233

Re: Post Standard Editorial on 1/7/05 By Alan Gancy
Post Standard Staff Writer Article on 1/7/05 re clean-up plan

Dear Sirs:

My intuition and experience as an engineer tells me that Alan Gancy is correct in his negative assessment of the DEC clean-up plan.

1. You don't have to be a rocket scientist to imagine that dredging the lake contamination could make things worse. I think it is reasonable to assume that least 1% of the now concentrated contamination will escape into temporary suspension and thru currents and storms will escape into temporary suspension and be distributed over the entire lake bed and associated river systems. That is, instead of 2.65 million cubic yards of contamination in one concentrated area that can be covered and declared off limits, we will end up with a thin layer of 26.5 thousand cubic yards of contamination spread out over the lake bed that cannot ever be covered or eliminated. 1

No doubt, there are plans to prevent the escape of the contaminants, but the best plans of mice and men sometimes fall apart due to unforeseen difficulties and carelessness.

I believe a rational plan for clean-up would be as follows: 2

1. Stop all continuing pollution;
2. Clean-up the lake front perimeter and make it fit for on-shore recreational purposes.
3. Cover the lake contaminants in-place.
4. Experiment with Mr. Gancy's inexpensive idea of "black box" filtering.
5. Let mother nature assist in the clean-up and recovery process. If it takes 20 years or 50 years, that's okay with most CNY residents.

Donald Hesler/Tim Larson

January 8, 2005

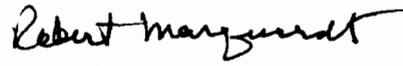
Page 2

3

I believe this is a cheaper, safer and less risky plan than the dredging plan, which is a major expense and risk in the \$449 million present DEC plan. Bear in mind, if the dredging idea back-fires, the entire \$449 million dollar plan is a disaster. Furthermore, the lake could take on a distributed lake bed pollution that could never be corrected by any practical means.

In conclusion, I believe the pay-off from dredging is not worth the expense and technical risk.

Very truly yours,



Robert Marquardt

\$449 million seems to me too much money to spend for the primary purpose of removing mercury from the bottom of the lake, and hence from its fish. There are more important environmental needs for the lake, not to mention for Onondaga County as a whole.

1

I propose a compromise with Honeywell, accepting a mercury cleanup costing around \$250 million, in exchange for Honeywell paying another \$150 million for non-mercury improvements to the lake and its environs. My first priority, after the mercury, would be to completely encircle that lake with park and recreational trail, my second would be to develop Onondaga Creek walk, opening recreational space along that prominent waterway into the lake.

2

In sum, I'd spend less on mercury and more on people's broader use and enjoyment of the lake.

Allan Mazur
246 Scottholm Terrace
Syracuse, NY 13224

(Comment received via e-mail from amazur@maxwell.syr.edu on 1/7/05)

I wish some of the \$450 million intended for mercury cleanup would be allocated to improving the shoreline of the lake, especially a path and parkland around the entire perimeter.

1

Allan Mazur
246 Scottholm Terrace
Syracuse, NY 13224

(Comment received via e-mail from amazur@maxwell.syr.edu on 2/22/05)

P-24



Ashley McGraw Architects PC
500 S. Salina Street
Syracuse, N.Y. 13202
Phone (315) 425-1811
Fax (315) 425-0166

Fax

To: DONALD HESLER

Project: _____ AMA Project #: _____

Fax: _____ Date: _____

Re: _____

From: _____ Page(s), including cover _____

- Urgent For Review Please Comment Please Reply Hard Copy to Follow

• Comments: _____

CC: _____

Petition to Loop Onondaga Lake as part of the DEC/Honeywell Remediation Plan

1

We the undersigned request that looping Onondaga Lake be include as one of the remediation measures that DEC should require to be achieved in the current options. We understand that this request may not be technically required by the pertinent regulations, but we also understand that public acceptance of the option selected is necessary. Five years ago, a wide ranging poll conducted by the local group F.O.C.U.S asked Onondaga County residents to list the measures they felt were the most important to achieve. Looping Onondaga Lake came out as number one on the list.

The current options under consideration do not appear to propose any above the water line corrections. These current options attempt to correct conditions for which there are technical remediation requirements, but the fact that the various pollutants and the huge waste bed destroyed the usefulness of the above water recreation facilities for large areas of the lake is apparently not addressed in the solution options. We respectfully request that it should have a very high priority, even if it requires acceptance of one of either Option 2, 3 or 4 instead of the \$455,000,000 Option 5 now proposed. We understand that a trail may require some filling in of areas of the lake where there is insufficient available shoreline property.

We request that a park-like trail around the lake similar to the East side park trail with a paved trail(s) suitable for running, inline skating, biking, walking and trams complete with support facilities be constructed as soon as possible. The trail needs to have dedicated trail bridges across the entering streams and have suitable grades and width to allow running, inline skating and wheelchair marathons to take place and with a connection to the 16,000 car State Fair parking lot. (Send to: DEC, 615 Erie Blvd W, Syracuse, NY)

Name	Signature	Address
J. Gary DROEGE	J. Gary Droege	10 PARKINGTON CIR EAST SYRACUSE
W. HOWARD CARD	W. Howard Card	117 Jaybrook Lane Syracuse NY 13214
Peter Coleman	Peter Coleman	4921 Palmer Rd Manlius 13104
Jean Coleman	Jean Coleman	4921 Palmer Rd Manlius NY 13104
Diane Chappell	Diane Chappell	917 Sumner Ave Syracuse NY 13205
Jody F. Brown	Jody F. Brown	104 Astor Ave #1 Apt. NY 13210
Charles Wollowitz	Charles Wollowitz	107 Diana Ave Syr. NY 13210
Jean Mahan	Jean Mahan	2257 Cole Rd Cassano NY 13035
Linda P. Wollowitz	Linda P. Wollowitz	707 Diana Ave Syracuse NY 13210
Mike Dillon	Mike Dillon	310 Kensington Rd 3, NY 13210
DALE SARGAN	Dale Sargan	3844 PARKWAY CTR. RD. MANLIUS NY 13104
ELLEN FELLER	Ellen Feller	302 BROAD ST - SYRACUSE NY 13210
Randy Case	Randy Case	58 Ely Drive Fayetteville N.Y. 13066
MARTIN ROTHGRIEBS	Martin Rothgribs	5211 Hook Cir F.ville NY 13078
Carro U. Grant	Carro U. Grant	58 Ely Dr Fayetteville 13066
Kenneth Teale	Kenneth Teale	1810 Thackeray Rd, F. Syracuse 13057
PRENDA LON	Prennda Lon	933 CUMBERLAND AVE SYRACUSE NY 13210
BRUCE GILBERT	Bruce Gilbert	129 S. EDWARDS AVE SYRACUSE, NY 13206
STEVE SCHROEDER	Steve Schroeder	6820 Kingsley Rd. Fayetteville NY 13066
KEVIN SMITH	Kevin Smith	178 OAKLEY DR E SYRACUSE, NY 13205
Peter O'Rourke	Peter O'Rourke	704 Fourth St. Liverpool, NY 13088
Sandell Stenderant	Sandell Stenderant	1255 Goodrich Ave Syracuse, NY 13210

Petition to Loop Onondaga Lake as part of the DEC/Honeywell Remediation Plan

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The current options under consideration do not appear to propose any above the water line corrections or improvements. These current options attempt to correct conditions for which there are technical remediation requirements, but the fact that the various pollutants and the huge waste beds destroyed the usefulness of the above water recreation facilities for large areas of the lake is apparently not addressed in the solution options. We respectfully request that it should have very high priority, even if it requires acceptance of one of either Option 2 (\$275,000,000), 3 or 4 instead of the \$455,000,000 Option 5 now proposed. We understand that a trail may require some filling in of areas of the lake where there is insufficient available shoreline property where railroad or steep waste beds occur.

We request that a park-like trail around the lake similar to the existing East side park trail with a paved trail(s) suitable for running, inline skating, biking, walking and trams complete with support facilities be constructed as soon as possible. The trail needs to have dedicated trail bridges across the entering streams and have suitable grades and width to allow running, inline skating and wheelchair marathons to take place and with a connection to the 16,000 car State Fair parking lot. (Send to: Donald Hester/Timothy Larson Onondaga Lake Superfund Site-Public Comments, DEC, 625 Broadway, Albany, NY, 12233, or Fax 518.402.9767

Name	Signature	Address
Jared Heath	Jared Heath	106 Melvin Ave Liverpool 13088
Jim Pizzomidi	Jim Pizzomidi	4421 Hoyt Rd. Skaneateles 13152
BILL SMITH	Bill Smith	437 S. MIDLER AVE 13206
Rebecca MacCaw	Rebecca MacCaw	185 Elmira Ave. NY 13229
Jennifer Dapson	Jennifer Dapson	116 Madison St. Oriskany Falls NY 13425
Dave Monaghan	Dave Monaghan	8013 Ballagher road Baldwinsville NY 13020
Jun Shim	Jun Shim	2704 G. Lawrence Syracuse, NY 13226
CHULWON AHN	Chulwon AHN	241 LATAYETTE RD #132 SYRACUSE NY 13205

COMMENTS ON DREDGING OF
ONONDAGA LAKE BOTTOM SEDIMENTS

DEC PROPOSED PLAN
Public Hearing – January 12, 2005

Comments by Les Monostory, Environmental Planner (retired)
Address: 125 Euclid Drive, Fayetteville, NY 13066
E-mail: fishbugm5@twcny.rr.com

Comparison of Remedial Plans

The Honeywell Plan for remediation of Onondaga Lake bottom sediments essentially calls for removal of 500,000 cubic yards of contaminated sediments, and covering contaminated sediments with 355 acres of protective layer or “cap”. NYSDEC’s preferred plan calls for removal of approximately 2.65 million cubic yards of contaminated sediments and covering approximately 579 acres of sediments with protective layer or “cap”.

In essence, the DEC Plan calls for dredging and removal of approximately five (5) times the volume of contaminated bottom sediments compared to the Honeywell Plan, and capping of approximately 1.5 times the sediment acreage proposed to be capped by Honeywell.

The various dredging technologies are described on pages 48 and 49 of DEC’s Proposed Plan dated November 29, 2004. Disposal of the dredged sediments is proposed to be accomplished by transfer of dredged materials to a sediment consolidation area (SCA), to be located at one of the Solvay wastebeds, such as Wastebed 13 in the Town of Camillus.

Hydraulic dredging will be used to collect a slurry of contaminated sediments containing about 10 percent solids, and the sediment slurry is proposed to be transported by pipeline to the sediment consolidation area. Upon delivery to the upland wastebed, the liquid slurry will then be consolidated and treated by filtration, air stripping, and activated carbon treatment in order to reduce contaminant concentrations. Silt barriers will be used in the open water work zones to contain resuspended sediments within each SMU dredging work zone.

Concerns over Dredging Operations

Results of contaminant testing by Honeywell and by DEC have shown that mercury and other industrial contaminants have been widely dispersed throughout the bottom sediments of Onondaga Lake.

Mercury discharges to the lake sediments have been greatly diminished over the past 30 years, and active chemical discharges to the lake have been nearly eliminated since closure of the Allied operations in 1986. For the past 20-30 years, Onondaga Lake’s

contaminated bottom sediments have been gradually covered with cleaner sediments contributed by inflows from the lake's major tributaries.

1 I am concerned over the DEC Plan's extensive use of hydraulic dredging, as dredging is a very dirty and disruptive practice that tends to disperse resuspended sediments throughout the water column. These resuspended sediments – containing mercury, PCB's and other chemical contaminants – will be absorbed by plankton and smaller organisms in the water column, and may be subsequently transported through the food chain to Onondaga Lake fish. We can expect to see elevated levels of mercury in Onondaga Lake fish for the duration of the dredging operations, plus the life span of those fish.

2 Recommendation for Sediment Treatment Priorities
My recommendation of priorities for the treatment of contaminated sediments in Onondaga Lake is that capping of those sediments with layers of clean stone, gravel and sand be the preferred alternative to dredging.

3 Hydraulic dredging of contaminated sediments should be limited to near-shore areas where slurry materials can be more effectively contained, and the use of dredging in deeper waters of Onondaga Lake should be minimized or eliminated altogether.

Hello,

I have watched onondaga lake clean up over the years.. Im happy to see the lakes water look clearer than it was back in the eighties.. I have a daughter who for a school project did a mini study on the lake on ways to assist in the cleanup efforts.. I helped her by paying for a water test of the lakes water from 3 places for compairasion.. The tests revelved it wasnt to high then in some chemicals but merc was high back then.. I then called my brother Dr.Micheal Dahlberg in Penn and spoke to him regarding my daughters project and told him of the tests results.. My brother works for the Federal Gov and has a pattend on reversing the effects of acid rain .. Mike had sent us liturature showing how hes cleaned up the waterways down in PA. Mike has used a manmade pond system using cornbobs to naturally clean the waters and its worked! Mike can send you for information you might want in regards to fixing the lake this way hes cleaned the waters from all the coal pollution that seeped in down there.. Mike said years ago he would gladly talk to anyone in regards to helping with input on the lake this is his hometown and he cares still.. Here is Mikes Address if you wish to speak to him

DR.Michael Dahlberg

165 Welsh Road

Washington PA 15301

Thanks For Caring About Our Waterways

Barb Motto

(Comment received via e-mail from barb13203@yahoo.com on 12/14/04)

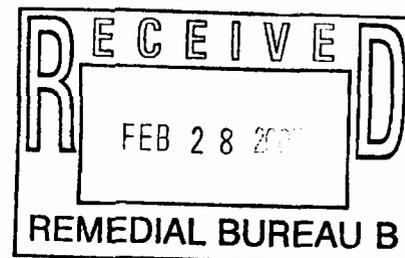
To Whom it may concern,

How does this sound, put rafts with thirty or forty feet of suspended old tires hanging down into the water table at random spots around the lake. these will give the zebra mussels a place to flourish, filter water and provide cover, shade and a place for fish to feed and school. Once or twice a year simply pull them thru a set of large rollers and let the shells help to coat the bottom. On top of these rafts could be wind driven or solar powered turbines hooked to a pump that would deliver aerated water to a lower depth than would normally be possible buy natural means. Granted these are far fetched ideas but reletively cheap when compared to the alterative. You guys have engineers who could solve the details. 1

Also near the head waters of Ley creek is a creek that flows directly out of Onieda Lake. If the land between the two could be purchased out of the clean up money or right of way secured, a small channel could be cut from one to the other, . because of the small change in elevation between the two lakes this shouldn't cause much of a problem. and would increase the flow of clean water in both the lake and creek, improving habitat in both for very little money or hassel. It shouldn't take a rocket scientist to figure out these waters were all connected by wetlands before we altered the natural flow of things. In a strange way it may help to heal the rift between the Onondaga & oneida indians since they have been isolated by the same things for about the same time. I hope that you read this and give it some serious thought, because what ever you do will go right buy my door. Thanks for your time. 2

Michael Murphy, Phoenix N.Y.

(Comment received via e-mail from Murfsurf69@aol.com on 1/18/05)



**John and Susan Murray
115 Golden Meadows Way
Warners, New York 13164**

Mr. Don Hesler and Mr. Timothy Larson
NYSDEC
625 Broadway
Albany, NY 12233

Dear Mr. Hesler and Mr. Larson,

We are writing to you in response to the recent town meeting in Camillus regarding the cleanup efforts of Onondaga Lake. We were unable to attend the meeting but feel strongly that our voice be heard. While we understand the importance of this effort, we have concerns over where the sediment being dredged up is to be disposed. We are one of a number of families who have recently built a new home in the Golden Meadows development off Airport Road. One of the many reasons we chose to build our house in the area was because of its clean, country-like appearance away from the hustle and bustle of many developments in the area. We now question whether this is to continue to be the case. 1

As parents of young children, we have concerns regarding the depositing of any type of contaminated sediments near our home. We question the residual effects there may be to having such material dumped near our home. Just as bad, how are residents of this community supposed to enjoy their yards if there is an odor from this sediment? What about land values? We paid a lot of money for a little "piece of heaven". Please don't destroy it for our children. Consider this picture: 2

It's a hot summer day and the kids are looking out the kitchen window at the pool and yard. Why are they not outside? Because of the odor coming from the old Allied Chemical landfill near Warners and Airport Road!!!

We beg you to do the right thing and consider other options that may be available to you. We do support the concept of cleaning up the lake. However, any plan that causes potential harm to people, of any community, is not worth it. If this is the case, you might as well just leave the pollution at the bottom of the lake and move on. 3

Please, reconsider the plan to dump waste sediments into the landfill near our, and our neighbors', homes. Thank you for your time and consideration of this matter.

Sincerely,

Two handwritten signatures in black ink. The first signature is "Susan Murray" and the second is "John Murray".

Susan and John Murray

January 7, 2005

TO: Donald Hesler/Timothy Larson
Onondaga Lake Superfund Site - Public Comment
NYSDEC
625 Broadway
Albany, NY 12233

FROM: Temple W. and Mary A. Myers
215 Pulaski St
Syracuse, NY 13204
[tmyers1@twcny.rr.com]

Subject: Onondaga Lake PP Comments

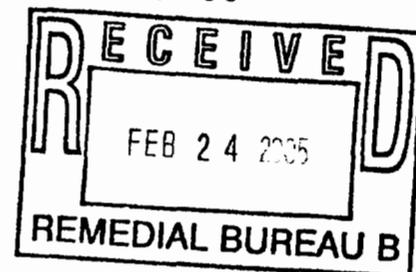
1. We are heartened to finally see substantial discussions and proposals taking place concerning the environmental improvement of Onondaga Lake. We still prefer the word "improvement" to "cleanup". 1
2. The one thing the United States military always tries to obtain from our leaders before they respond to a major crisis is: **A Clear Set Of Goals**. Clearly define the desired outcome. What is the time frame? This project deserves no less than a clear set of goals. 2
3. Does the desired outcome include the community's ability to fish, eat fish, wade, swim, etc. in and around the lake? What does the community want to see when this "cleanup" is done? What is the government's backup plan to attain the original Set of Goals in the event the so-called "cleanup" plan falls short of our goals? Does Honeywell endorse all of that? Does the public endorse all of that? **Be sure the goals are clearly stated, and alternatives are also clearly stated.**
4. If Honeywell walks away saying it has satisfied its part of the agreement, and yet the government and the community are dissatisfied with the so-called "cleanup", what is the next step? Who pays for the next stage? How long must we and our children's children wait? What are "acceptable levels of pollution" after the so-called "cleanup"? 3
4
5. When the waters are finally "improved" enough to support the public fishing, eating fish, wading and swimming, how does the community ensure the waters and shorelines will remain forever accessible to the public? It would be a travesty to see billionaires and politicians promoting the construction of "huge waterfront destinations for the benefit of the community". Horse feathers! Our community already smells those suspect and telltale odors at the Lakefront and Inner Harbor - as well as with the current investigation into the mishandling of the NY State Canal System. 5
6. Are the waters reasonably protected - per current technological standards - from future pollution? Is there a Master Plan to protect the lake and control future development of surrounding properties, shorelines and drainage systems - things that could impact future water quality and free public access? 6
7. Will my family be able to fish, eat the fish, wade and swim in Onondaga Lake at the end of the Honeywell so-called "cleanup"? If not, then we have wasted a lot of time and money. 7
8. I see a lot of questions that remain unanswered. If I were an astronaut and this were the first moon shot, I'd be extremely upset right now. 8

- 9 9. Five generations of my family and extended family have lived and played on or near the shores of Onondaga Lake since the turn of the 20th century, so it holds a special meaning in our family history. We hiked, waded, swam and fished in those waters many, many years. We want to see children and grandchildren have that same opportunity once again.

Thank you for all the work you have accomplished, and for bringing this most serious undertaking to the public forum; and thank you for listening to our concerns.

Sincerely,
Temple W. and Mary A. Myers

(Comment received via e-mail from tmyers1@twcny.rr.com on 1/7/05)



407 Breakspear Road
Syracuse, New York 13219-2315

Mr. Timothy Larson
NYSDEC
625 Broadway
Albany, NY 12233

February 22, 2005

Dear Mr. Larson:

This letter is in response to public input into the DEC's plans for the cleanup of Onondaga Lake in Onondaga County, New York. I have been following summary preliminary plans as presented in our newspaper The Post Standard, and I have seen any plans for the remediation of Lakeview Point, a 500 plus acre parcel of land on the southwest shore of the lake, currently owned by Onondaga County and the State of New York. The parcel adjoins the New York State Fairgrounds, the main interchange for interstates 690 and 695, and otherwise is mostly vacant land with billboards, trailers, and temporary parking for the fairgrounds.

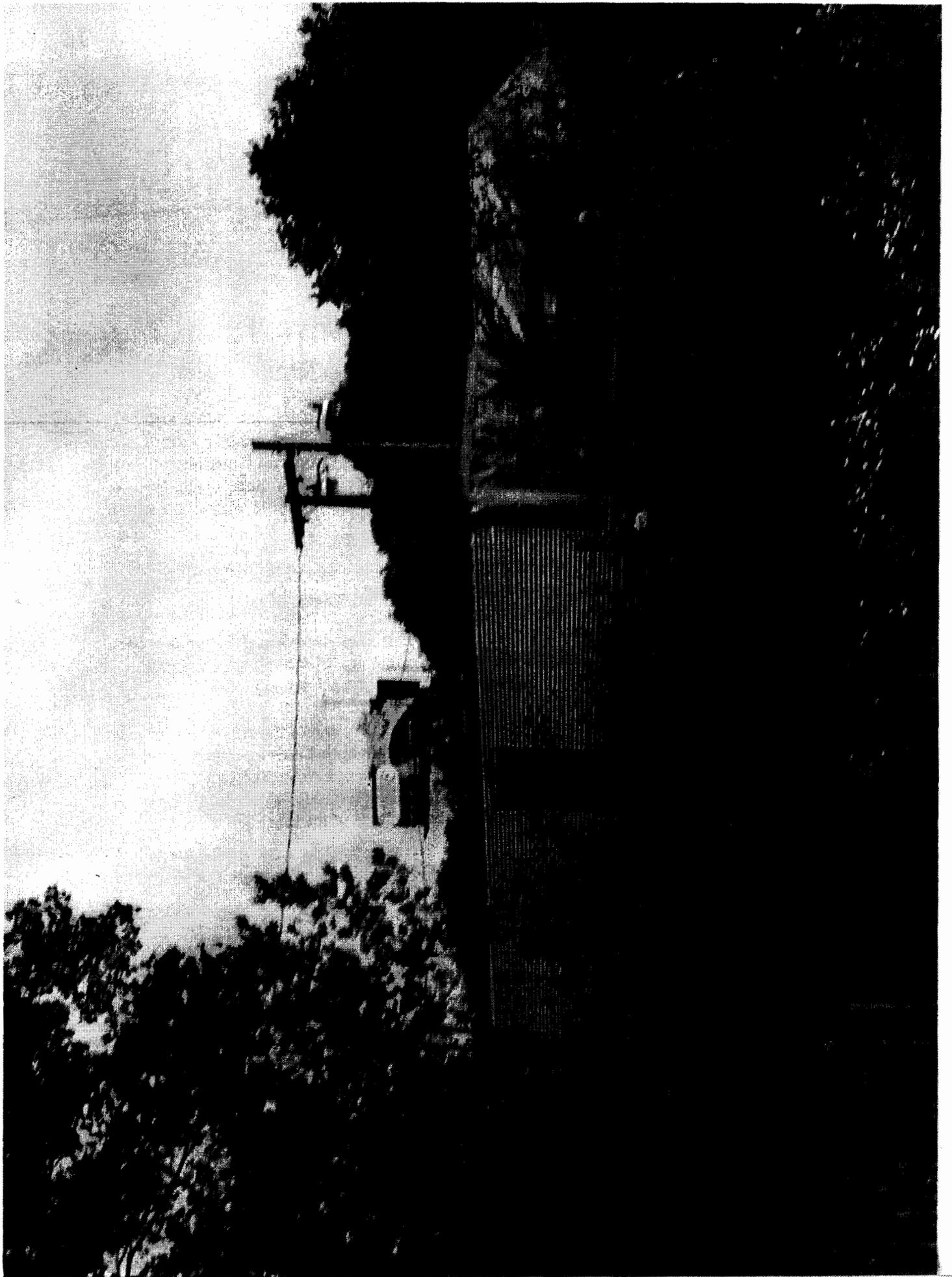
Before World War One, the site was a prime amusement area with beaches and an amusement park, but fell into disuse after 1920, when Solvay Process (now Honeywell International) began to dump some 230,000,000 tons of Soda-Ash until the plant process changed in 1948. The land remained dormant until the early 1990's as a fairgrounds sub-use area. The soda-ash still remains, and unless treated, modified or removed, it may compromise plans to clean the Onondaga Lake watershed and water quality.

Enclosed is a recent photo of Lakeview Point at the eastern end of the site, taken in June, 2001, and it tells a story of some 80 years of neglect. We hope Lakeview Point is seriously considered for a clean up as well as the lake. With a clean lake, and a clean Lakeview Point site, it would give the Town of Geddes unlimited opportunities to re-develop the site, and pass on to future generations full use of the lake.

Sincerely,


Michael P. Nowak

Cc: Town of Geddes Supervisor
Mr. Robert Czaplicki
Geddes Town Hall
1000 Woods Road
Solvay, New York 13209





Form for Submitting Comments on the Onondaga Lake Proposed Plan

P-31

Your input on the Proposed Plan for the Onondaga Lake subsite of the Onondaga Lake Superfund site is important to NYSDEC. Comments provided by the public are valuable in helping us select a final cleanup remedy for the site.

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THIS LAKE SHOULD NEVER BEEN ALLOWED¹
TO GET IN SUCH A BAD CONDITION.
I GREW UP ON THE SHORES OF THIS LAKE AND
I AM SICK OF WHAT HAPPENED TO IT. IT
SHOULD BE RESTORED TO ITS ORIGINAL²
CONDITION. NO SHORTCUTS

Your Name
Address
City
State
Zip
Phone

DANIEL L. OPZELL
303 FERN RD
SYR
NY
13219
468-3274

58 Redoak Drive
Buffalo, NY 14227

February 26, 2005

Mr. Don Hesler
Mr. Timothy Larson
NYSDEC
625 Broadway
Albany, NY 12233

Dear Mr. Hesler and Mr. Larson,

I have been reading the various plans being considered for dredging the bottom of Onondaga Lake and burying the contaminated sediment in a landfill waste bed or back in the lake along the shoreline. Besides the odor and the distinct possibility of the toxic matter being leached out, these schemes would create more problems. 1

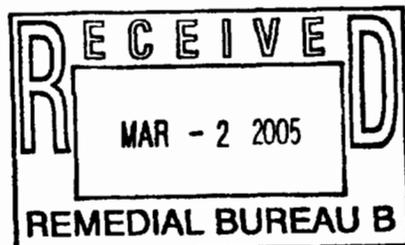
A better way would be to immobilize the pollutants by mixing them with cement and disposing the cement blocks in the landfill or dumping them in the ocean. 2

A very careful consideration should be given to all the suggested schemes before proceeding with the cleanup.

Sincerely,



Rusi Poncha



Garrie Procopio
108 Sizzano Trail
Syracuse, NY 13209
315.488.0481
gadues@earthlink.net

February 18, 2005

Attn: Timothy Larson, P.E., Project Manager

TO WHOM IT MAY CONCERN:

After recently discovering that the NYSDEC is actually considering a remedy for the clean up of Onondaga Lake by disposing of it's contaminated sediment in my very own back yard, I was understandably outraged!

Since my first day in Syracuse, New York, I have been saddened by the fact that someone allowed such a beautiful lake to be slowly destroyed with the disposal of contaminated waste. I am in support of an attempt to rectify this tragic situation, although I have my doubts that such a clean up can be accomplished. However, this understanding of why an attempt would be made to clean up Onondaga Lake does not explain why, in the process of doing so, someone would make the exact same mistake that allowed this lake to be polluted in the first place. It occurs to me that a disregard for the way a contaminated environment effects it's community is exactly what caused this problem to begin with. It is my understanding that the NYSDEC, is proposing to repeat this historical error and disregard the effects of a contaminated environment on it's community when discussing the disposal of contaminated sediment at the Belle Isle Road Construction Landfill. If the DEC has not already done so, I suggest they visit the neighborhoods and businesses that have this same landfill in their backyards and see just where they are proposing to bring these contaminants. I would like to know how the DEC would feel if someone moved such sediment next door to where their children would grow up? Yes, there are many people, including young children, who live off Belle Isle Road in the Town of Camillus (location of the construction Landfill)! These same families did purchase a home near a construction landfill. However, they did not purchase a home near a contaminated sediment waste pile. I am also wondering if the DEC is aware of how close this Landfill is to Genesee Street and it's neighboring Schools?

If this proposal were approved, what is the DEC going to do about the health hazards to our children, decrease in the value of our homes (which are currently selling at their highest in the 8 years that I have lived here), contamination to our air and water, and the odor which will result though out the town of Camillus (just to name a few concerns).

I am prepared to enlist my neighbors in a battle against this disposal site, taking legal action if necessary. And, if I am unsuccessful in stopping this contamination of my neighborhood, then I would like to officially thank you (NYSDEC) for forcing me to move from my home, as I would no longer wish to raise my children in a potentially hazardous environment. If I am forced to do so, I would expect to sell my home for much less after the waste dumping occurs, as I would currently! However, I'm sure the DEC is prepared to reimburse me for the loss in property value?

- 4 I would appreciate an immediate response by the NYSDEC to this letter and formally
request that there be more open forums to discuss this issue before any decisions on
this matter are made. I would also like to be notified of a deadline for submitting a
5 petition regarding this matter. I do not feel the community i live in has been given proper
notice or time in which to oppose this proposal.

Sincerely,

Garrie Procopio

(Comment received via e-mail from gadues@earthlink.net on 2/19/05)

Correction

RE: Onondaga Lake Cleanup Proposal

Dear Editor,

Regarding the letter just emailed minutes ago, I have mistakingly mentioned that the Onondaga Lake Cleanup would move sediment to the *Belle Isle Road Construction Landfill*. However, the proposed location is near Warners and Airport Roads in Camillus NY. According to your newspaper, the landfill is called *Waste Bed 13*. This location is approximately 1 mile from the one I had previously named **in error**. 1

Thank you,
Garrie Procopio

(Comment received via e-mail from gadues@earthlink.net on 2/19/05)

Correction

RE: Onondaga Lake Cleanup Proposal

Dear Editor,

Regarding the letter just emailed minutes ago, I have mistakenly mentioned that the Onondaga Lake Cleanup would move sediment to the Belle Isle Road Construction Landfill. However, the proposed location is near Warners and Airport Roads in Camillus NY (as you must know). According to Syracuse newspapers, the landfill is called *Waste Bed 13*. This location is approximately 1 mile from the one I had previously named in error. However, the remainder of my letter is unaffected by this error. ¹

Thank you,
Garrie Procopio

(Comment received via e-mail from gadues@earthlink.net on 2/19/05)



Form for Submitting Comments on the Onondaga Lake Proposed Plan

Your input on the Proposed Plan for the Onondaga Lake subsite of the Onondaga Lake Superfund site is important to NYSDEC. Comments provided by the public are valuable in helping us select a final cleanup remedy for the site.

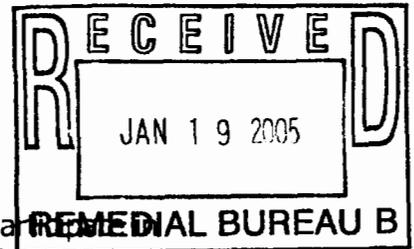
You may use the space below to write your comments. Use additional pages if needed. Fold the form along the dotted lines and tape (do not staple) the form closed. The return address is already printed on the reverse side. **Comments must be postmarked by March 1, 2005.** Those with electronic communications capabilities may submit their comments to NYSDEC via the Internet at the following e-mail address: DERweb@gw.dec.state.ny.us. Please note "Onondaga Lake Proposed Plan" in the subject box.

It is excellent that a lake remediation¹ plan is close to happening. I support a plan of action for the lake by April 1, 2005. Acting now is excellent. No more lake study - act please.

But you do need to do more² in the next three years on the following elements:

- Movement and disposal of dredge spoils.
- liners and design of upland³ dredge spoil disposal sites
- capping and closure of⁴ the upland disposal sites
- In the three year design phase⁵ do another public hearing on the transportation and upland disposal fill dress. Make these elements the best for our environment.

Your Name _____ T. RHOADS
 Address _____ 19 HAWAII ST
 City _____ GRANVILLE
 State _____ NY
 Zip _____ 13152
 Phone _____ 685-2447



Comments - Onondaga Lake Proposed Plan

1. Thank you for providing the public with the opportunity to participate in the plan. The DEC has done a very good job in discussing the proposed plan for the lake cleanup. 1
2. The presently published plan documents are not developed in adequate detail for the work related to: 2
 - the conveyance of the dredged contaminated sediments,
 - the design of the sediment consolidation areas,
 - the treatment of leachate from the sediment consolidation areas,
 - the closure and post closure monitoring of the sediment consolidation areas,
 - And the final plan for the upland areas known as the Allied Waste Beds as well as the sediment consolidation areas so that these significant parcels of land can become wildlife habitat again and perhaps even be used for hunting, hiking, and other forms of outdoor recreation in the future.
3. The sediment consolidation areas are suggested to be design elements to come later in the process, but (perhaps) not subject to a separate public hearing process. Please submit the design of these landfills and systems to a future public hearing, not just a public meeting. These containments are not simple design elements – the waste bed underlying the containments will be a very difficult factor in design. There is serious potential for slope failure or liner failure in the sediment consolidation landfills due to the poor foundation materials. Liner tears could occur as the underlying waste beds consolidate under the load from the dredge spoils. The conventional perimeter berm for a typical landfill will likely not work in these same poor foundation conditions. Side slopes and slope failure will need to be carefully considered as the dredge spoils will be very wet and have low shear strengths. 3
4. The conveyance of the dredge spoils is no small environmental matter. The traffic impacts, fugitive emission impacts, and odor impacts from these sludges must be carefully managed to protect the environment and cause no undue harm to the local population. Trucking dredge spoils in the significant quantities proposed would be a very significant environmental impact/problem. Dredge materials must not be tracked out of the containment areas by the exiting truck traffic. Also, traffic problems would be enormous if the trucks used public roadways. Even the diesel emissions from the trucks themselves will be significant and the entire conveyance plan should be developed and presented to the public at a public hearing so that all these facets of the project can incorporate public comment. 4
5. Leachate treatment considerations, discharge standards, and design of the leachate treatment system to handle the complex mix of organic and 5

metallic contaminants will not be trivial. These elements are truly part of the design phase; however they are significant enough to merit public hearing (not just future public meetings to announce the final design). The eventual discharge from the treatment facility will likely be to the Onondaga Lake Watershed. As I am sure the DEC recognizes– it would be pointless to remove the sediments and pollution from the lake, only to allow the treated leachate to later reduce overall quality of the incoming tributaries to the lake.

6

6. Habitat for wildlife must be vastly improved as the sediment consolidation areas and waste beds are finally closed and capped. Design considerations need to incorporate deep soil cover layers over final impervious HDPE caps so that vegetation can restore the land and wildlife can return to the currently barren lands. Require the construction of the final contour of the site to include varying topography, pockets of trees and shrubs, and 'natural' wetland type pockets in the finished site plan. Require adequate closure and capping design so that these habitat elements can exist in the final land area – please don't create a 400 acre two-to-one sloped hump with marginal grasses, four feet of dirt allowing no trees or woody growth, and no wildlife habitat. Require the incorporation of public recreation uses and access. Require investment in habitat, nesting areas, wildlife forage and cover, access trails, parking at trailheads, and the ability for these areas to at least contribute to the public enjoyment. The taxes lost to future generations by the use of these waste beds for the containment of the wastes on a multi-generational time scale should require significant initial and recurring investment in public uses to at least partial repay the community.

7.

Thank you again for the opportunity to submit comments,



T. Rhoads
19 Hannum St.
Skaneateles, NY
13152

January 14, 2005

200 Stoneridge Drive
DeWitt, NY 13214
February 18, 2005

Mr. Donald Hesler/Mr. Timothy Larson
Onondaga Lake Superfund Site—Public Comments
Department of Environmental Conservation
625 Broadway
Albany, NY 12233

Dear Mr. Hesler and Mr. Larson:

I am writing in support of creating a multi-purpose recreational trail around Onondaga Lake. A recent letter to the editor in the Syracuse Post-Standard newspaper indicated that the remediation options you are considering might not include all the improvements necessary to create such a recreational trail: 1

Building a suitable recreational trail may require filling in areas where there is insufficient available shoreline property. The trail needs bridges across the streams entering the lake and suitable grades and width to allow running, inline skating and wheelchair marathons. (Post Standard letter to the editor, 2/18/05)

Much information is available on the importance of having usable green space in a community. I have walked sections of the trail that currently exists and have loved having the lake so close and the city seem so distant. As part of Syracuse's future, such a trail would continue to bring people together, provide a valuable recreational area, and show a planning vision that sometimes has been wanting here. In fact, I would be glad to volunteer in any capacity that you might need in order to establish this system.

Thank you for your consideration in this matter; I appreciate your time.

Sincerely,


(Mrs.) Sandra Russell
315-445-9408

As a life long resident of Central New York (33 years) I have waited my whole life to see Onondaga Lake fixed. The proposed clean-up while a hard won victory in some ways is a failure in others. Capping the lake is unacceptable. This is a real problem and needs a real and final solution. If the lake is too far gone than let it go and focus your energy on problems that can be fixed but don't throw away this opportunity to start fixing the lake the right way. NO CAPPING

Jesse Ryder

(Comment received via e-mail from jesseryder@hotmail.com on 2/3/05)

Please add these names to the comments on the Onondaga Lake Project

February 23, 2005

P-40

As residents of the Liverpool community and neighbors of Onondaga Lake, we hold a unique perspective and stake in the Onondaga Lake cleanup project. Our homes, businesses and daily lives have been and will continue to be intertwined with the history and future potential of the lake.

1

After reviewing the Honeywell lake cleanup proposal, it is apparent this plan is solid in design and that this cleanup has the potential to increase our quality of life through economic development and recreational projects tied to Onondaga Lake. We understand that the New York State Department of Environmental Conservation (DEC) has released an alternate plan that is similar to the Honeywell approach.

That is why, we, the undersigned, encourage the DEC and Honeywell to come together and find an agreement that allows the cleanup to begin as soon as possible. Project completion is economically and recreationally advantageous to us all living and working on or near the lake.

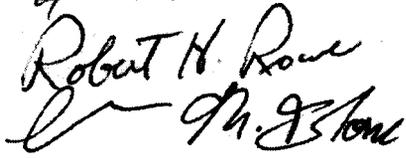
Liverpool Citizens

- Colleen Gunning 117 Green Acres Dr. Liverpool 13090 ✓
- ALBERT J. ANTELMINI - 125 WILMORE PL. SYR NY 13208 ✓
- 3963 Pawnee Dr. Liverpool, N.Y. 13090 ✓
- Fannie M. Antelmi 125 Wilmore Pl. Sy. N.Y. 13208
- 6 Tigerwood Dr. Liverpool NY 13090
- Robert H. Rowe 313 Pleasantview Dr. " " 13088
- M. Stone 127 CIRCLE RD SYRACUSE NY 13212
- 225 Richk H Blvd Marvotak NY 13211
- 407 Brookfield Rd. Methyls, N.Y. 13211

DON COOK →









February 23, 2005

As residents of the Liverpool community and neighbors of Onondaga Lake, we hold a unique perspective and stake in the Onondaga Lake cleanup project. Our homes, businesses and daily lives have been and will continue to be intertwined with the history and future potential of the lake.

After reviewing the Honeywell lake cleanup proposal, it is apparent this plan is solid in design and that this cleanup has the potential to increase our quality of life through economic development and recreational projects tied to Onondaga Lake. We understand that the New York State Department of Environmental Conservation (DEC) has released an alternate plan that is similar to the Honeywell approach.

That is why, we, the undersigned, encourage the DEC and Honeywell to come together and find an agreement that allows the cleanup to begin as soon as possible. Project completion is economically and recreationally advantageous to us all living and working on or near the lake.

Liverpool Citizens

Rowl M Fry 204 Wacker at Road Liverpool ny.

Joseph M. Kelly 639 Old Liverpool Rd. Lic. 13086
Fred H Nyler 506 Linden St Liverpool ny 13088 13688

MEMO FROM THE DESK OF

Donald L. Schoenwald

THIS LETTER IS VERY
PERSUASIVE AND I HOPE
THESE SUGGESTIONS WILL
BE INCLUDED.

THANK YOU VERY MUCH!

(DON SCHOENWALD)

**Make loop trail part
of lake remediation**

To the Editor:

Looping Onondaga Lake with a usable recreation trail should be part of the current lake remediation options.

This may not be technically required; but public acceptance of the project is apparently needed. A few years ago, FOCUS asked county residents to list the measures they felt were most important. Looping Onondaga Lake was No. 1. I speak for these folks.

The four current remediation options do not appear to propose any above-the-waterline corrections of improvements. I request that such improvements should have a high priority.

From my review of the remediation option documents in the central library, the principal difference between Option 2 and Option 5 appears to be the amount of contaminated sludge pumped to the waste bed in Geddes, and that in Options 2, 3, 4 and 5, the whole lake bottom will be capped to contain or reduce further release of mercury and other contaminants.

Building a suitable recreation trail may require filling in areas where there is insufficient available shoreline property. The trail needs bridges across the streams entering the lake, and suitable grades and width to allow running, inline skating and wheelchair marathons.

The DEC needs to hear from us before March 1. Send your opinion to: Donald Hesler/Timothy Larson, Onondaga Lake Superfund Site-Public Comments, Department of Environmental Conservation, 625 Broadway, Albany, NY, 12233.

David C. Ashley
Syracuse

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Why not require the incorporation of a permeable barrier material (i.e. zero valence iron) within the capping materials on the lake bottom. This would allow for treatment of chlorinated compounds and some petroleum compounds. As it is a cap, any precipitates formed would be inconsequential to the cap. 1

Regards,
Bill Spizuoco

(Comment received via e-mail from Scott A. Zollo, szollo@plumleyeng.com, on 3/4/05)

Gentlemen:

Almost 12 years have passed since the first water sample was taken from Onondaga Lake to initiate the AlliedSignal RIFS of the lake.

1

I write in support of the Honeywell plan to dredge 500,000 cubic yards of sludge and cap the exposed lake bottom. To do more may require additional sampling and studies, extend the design period and significantly lengthen the dredging and capping schedule.

It is time to move on with the work and demonstrate to the Syracuse community that all parties are serious about completing the task in a timely manner.

Sincerely yours,
James H. Tyler, PE, F.ASCE

(Comment received via e-mail from jhtyler@juno.com on 2/18/05)

Just wondering why the entire proposal is NOT being offered as a PDF file on your website? Instead of subjecting the people of the state of NY to travel to a site where the volumes will probably be in use or not available at the time of their visit.

Richard D. Valenti Jr.
CP Specialist #5321 (NACE)
5201 Dunhill Road
Fayetteville, NY 13066-9613
Fax: (315) 637-9532
Mobile: (315) 391-0801
email: RDValenti@aol.com

(Comment received via e-mail on 12/8/04)

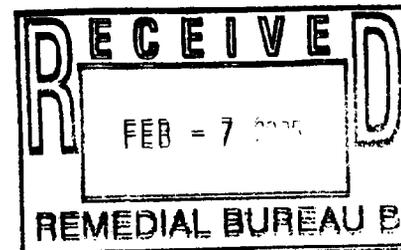
My comments on the cleanup of Onondaga Lake would be that Honeywell would insure that they 1
would not contaminate it any further with the removal of the material that will be dredged, and the
current marine life would not be disturbed. I also would hope that the entire lake would be cleaned up,
not just to a certain portion because perhaps later in time, it will be more expensive. 2

Deborah Webster

(Comment received via e-mail from DWEBSTER@dot.state.ny.us on 3/1/05)



STRUCTURAL ASSOCIATES, INC.
General Contractors/Construction Managers



February 4, 2005

Mr. Donald Hesler
Onondaga Lake Superfund Site Public Comment
NYS Dept. of Environmental Conservation
625 Broadway
Albany, NY 12233

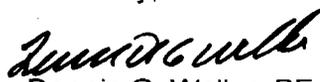
Dear Mr. Hesler:

I have read with great interest the steps being proposed by Honeywell Corp. and the New York Department of Environmental Conservation for the environmental remediation of industrial pollution in Onondaga Lake. It is in my estimation, time for all parties to reach an agreement and finally move ahead with the cleanup of this wonderful physical asset we have in our area. If we move forward now we may all be able to enjoy the benefits of a clean lake in our lifetime. 1

Along with the other great things being discussed within our community at this time, imagine the additional impact a clean Onondaga Lake could have on our local economy.

I urge the parties working on the final cleanup plan, to reach an agreement now, and move ahead with this project. We finally have the opportunity, after to long a wait, to restore Onondaga Lake to a point of pride in Central New York.

Sincerely,



Dennis G. Weller, PE
President

Principal Office
800 Starbuck Ave.
Watertown, NY 13601
PH: (315) 779-8878
FX: (315) 779-9588

Corporate Office
5903 Fisher Road
East Syracuse, NY 13057
PH: (315) 463-0001
FX: (315) 432-0795

Branch Office
PO Box 43968
Baltimore, MD 21236
PH: (410) 931-0905
FX: (410) 931-0135



Form for Submitting Comments
on the Onondaga Lake Proposed Plan

P-47

Your input on the Proposed Plan for the Onondaga Lake subsite of the Onondaga Lake Superfund site is important to NYSDEC. Comments provided by the public are valuable in helping us select a final cleanup remedy for the site.

You may use the space below to write your comments. Use additional pages if needed. Fold the form along the dotted lines and tape (do not staple) the form closed. The return address is already printed on the reverse side. Comments must be postmarked by March 1, 2005. Those with electronic communications capabilities may submit their comments to NYSDEC via the Internet at the following e-mail address: DERweb@gw.dec.state.ny.us. Please note "Onondaga Lake Proposed Plan" in the subject box.

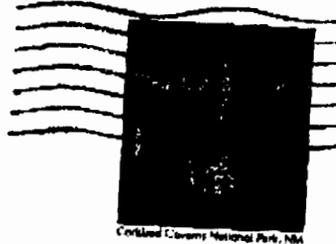
WE HAVE AN IRRIGATION WELL, A WILDLIFE + RECREATION POND + GROWING VEGETABLES ON OUR PROPERTY. HAVE ALWAYS HAD A CONCERN FOR THE SAFETY OF THE GROUND WATER. TESTING IS PROHIBITIVELY EXPENSIVE FOR US

DO YOU HAVE A GROUND WATER MAP OF OUR AREA SO WE CAN DETERMINE IF WE HAVE CAUSE FOR CONCERN?

Your Name: PAM WOODCLIS
Address: 5990 BELLE ISLE RD #7
City: SYRACUSE
State: NY
Zip: 13209
Phone: 315-468-3225

Ms. June Anne Fey
 8912 Boak Rd. E
 Holland Patent, NY 13368

NY 13368
 PM
 27 APR
 2005



APR 28 2005

Onondaga County Regional
 Office - DEC
 615 Erie Blvd. W.
 Syracuse, NY 13204

1

April 27, 2005
 To Whom It May Concern:

I'm writing regarding the proposed clean up of Onondaga Lake by the corporate polluters.

I feel their solution is definitely a no-win for everyone but them. Their way is never going to work. They must be forced to do it properly, or a bad example will be set for future clean ups. Thank you,
 June Anne Fey

Dear Honorable Governor George E. Pataki,
I was reading the latest Albany Times Union article “Onondaga Lake cleanup faces delay EPA wants dredging in Syracuse postponed after tribe says leaders weren’t given timely notice (Associated Press First published: Monday, March 28, 2005) with great interest when I came across the following sentences:

...The federal government said more time is needed to evaluate public concern over the state’s plan to clean up the heavily polluted Onondaga Lake.

...The nation, which wants all polluted sediment removed, told the EPA its leaders were not consulted in a timely matter. Federal Superfund cleanup laws require input from the tribe, which considers the lake sacred.

...The state unveiled its plan in November, under which Honeywell international would pay for the cleanup of 165,000 pounds of mercury. The state blames the pollution on the Allied Chemical plant in Solvay that closed in 1986. Honeywell merged with Allied in 1999 and became responsible for pollution Allied dumped into the lake and along the shoreline.

...Allied made liquid chlorine and caustic soda at the plant for almost 100 years before selling the property to LCP Chemicals in 1979. The plant ceased operation in 1988 under pressure from the state after repeated chlorine leaks.

...Today, the lake is a toxic stew of mercury, ammonia, phosphorous, PCBs, benzene, cyanide and other pollutants. The lake bottom is a virtual junkyard of cars, barges, discarded tires and rims, and broken dishes.

...Under the state plan, Honeywell, which is based in Morris Township, N.J., would be required to dredge up to 2.65 million cubic yards of contaminated sediment from the lake and cap about 580 acres of lake bottom.

- 1 Please review and implement an action plan to thoroughly address this extremely troubling issue. Media reports continue to underscore the seemingly lack of progress in thoroughly cleaning up this valuable freshwater natural resource, despite the significant potential for adverse human health and environmental effects. This comes at a time of skyrocketing health care and environmental costs. Please contact the appropriate stakeholders/personnel to turnaround these growing issues and concerns. Please coordinate, collaborate and cooperate on Federal, State and/or local jurisdictional levels in

addressing these concerns potentially impacting adversely public health, lands, trust, confidence, environment and quality of life issues. Thank you for your time in this matter and hope to hear from you soon.

Sincerely,
Alex Balboa
26 Babcock Avenue
Ronkonkoma, NY 11779-6705

(Comment received via email from alexbalboa_us@yahoo.com on 3/30/05)

George,

This is supplemental to my recommendation about the Onondaga land claim/lake cleanup thread I sent.

I would like to have someone email me back about this next question I have— I have previously heard about some professors, I think they were at SUC Oswego, who had come up with a process using microbes that actually digested pollution. This seems to be to much more preferable than one that merely digs it up and transports it to another site, thus polluting a whole new site.

1

Is this microbe idea a valid solution? Is it out of favor for some unknown political reason in the scientific community? It seems to me that it would be much cheaper, and a more sound way of doing things if not.

Have someone let me know. I am very curious about this.
Thanks, Sallie

(Comment received via email from sage@sagaciousconsulting.org on 3/17/05)

In looking over the Honeywell proposal for Onondaga Lake sediment remediation, and the NYS DEC responses to the proposal, I have not detected a thoughtful evaluation of the innovative technologies that genuinely remove mercury from sediments or those technologies that dechlorinate hazardous synthetic chemicals. A thorough examination of those technologies and their potential usefulness for cleaning Onondaga Lake can contribute to a clearer understanding of how to achieve the best outcome for the lake, and for the community who live near it, including myself. We need not settle for plastic surgery when chemotherapy might provide a cure. 1

References to such technologies that have come to my attention, and are not necessarily a complete list, include the following:

A technology (Twidwell and Rockandel patents) to remove mercury from chlor-alkali waste without incineration is vended by Universal Dynamics (http://www.udl.com/systems/remerc_x.html) to chlorine manufacturers and is based on two patents.

1. M.A. Rockandel, L.G. Twidwell, "Hydrometallurgical Process for Treating Mercury Contaminated Muds", United States Patent 5,209,774, (1993), 8 p.

2. M.A. Rockandel, L.G. Twidwell, "Mercury Contaminated Mud Treatment", United States Patent 5,314,527, (1994), 18 p.

For other discussion on separation of organics from mercury waste, see the USEPA contract Document, "Analysis of Alternatives to Incineration for Mercury Wastes Containing Organics, " [EPA Contract No. 68-W4-0005, WA No. R11032 TechLaw Subcontract No. G-200-010 SAIC Project No. 06-6312-08-5226-002], viewable at www.epa.gov/epaoswer/hazwaste/ldr/mercury/incinalt.pdf
On-site dechlorination of NAPLs is discussed in this week's issue of Science News.

Alexandra Gobo, "Special Treatment" Science News, 167:266-268 April 25, 2005 reviews techniques to dechlorinate NAPLs (le.g. trichloroethane) by using nanoparticles, in situ and in soil.

The sciencenews.org website does not carry the article itself, but it does carry a link to the references used in the article, <http://www.sciencenews.org/articles/20050423/bob10ref.asp>

The US-EPA's NCER site carries an abstract about using iron nanoparticles to dechlorinate NAPLs.

<http://es.epa.gov/ncer/publications/meetings/8-18-04/abstracts/lowry.html>

During the public comment period, I have approached representatives from Honeywell, Atlantic States Legal Foundation and the Onondaga Nation, and urged them to look into the mercury extraction technologies.

At this time I have no personal financial interest in any of these remarkable techniques, nor have I seen their actual products.

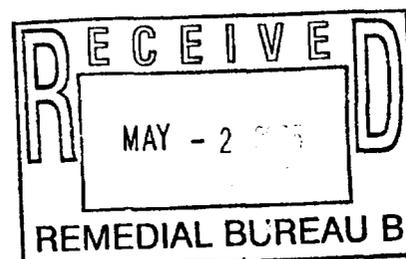
The focus of my comment is the absolute need to leave no stone unturned in evaluation of all methods, and particularly these innovative remediation methods, in the selection of a genuine and effective lake clean up process, one that will take years into the future under the best of circumstances.

Respectfully submitted,
Joan E. Cope Savage
Joan Cope Savage
201 Houston Avenue
Syracuse NY 13224
(315) 472-5785

(Comment received via e-mail from jcopesal@twcny.rr.com on 4/29/05)

Apr. 27, '05

Donald Hesler/Timothy Larson
 Onondaga Lake Superfund Site - Public Comment
 NYS Dept. of Environmental Conservation
 625 Broadway
 Albany, NY 12233-7016



Dear Sirs:

Having read the 81+ page document entitled "Onondaga Lake Bottom - Subsite of the Onondaga Lake Superfund Site - Syracuse, New York - Proposed Plan - November 29, 2004" that I obtained from the DEC website, I have the following comments to make.

With regard to background:

The DEC declares in this document that Honeywell operated manufacturing facilities in Solvay, NY for over 100 years which released, among other materials, mercury since at least the 1940's, and organic contaminants as early as 1918 (p9 & 12) and that current loads of contaminants to the lake are "primarily derived from Honeywell sites in the vicinity of the lake and along its perimeter" and further that it was Honeywell contributions that were the dominant sources of historical and current lake contamination (p13-14). In other words, Honeywell activities over almost 100 years are the major reason the Lake is a superfund site. This document also points out that the lake supported a thriving resort industry around the turn of the 20th century and even a commercial fishing industry in a "plentiful cold water fishery" until at least the late 1800's, around the time Honeywell began using it as a toxic dump, and even states that one of the impacts of the contamination is the "elimination of cold-water fishery" (p20). In other words, it would appear that Honeywell not only transformed a lake into a dump, but was/is responsible in large part for destroying a thriving economic and recreational asset of the community. This, by way of background for establishing not only the extensive amount of damage, but the considerable amount of time over which this damage was caused, i.e. this wasn't just a "mistake" caused by an "oops" - this was deliberate, planned dumping which no doubt saved Honeywell hundreds of millions, if not billions of dollars, over the 100 years of such activity.

The document claims that "the primary objectivesare to remediate the sources of contamination within the ..Lake sediments such that any potential future health and environmental impacts are eliminated or reduced, to the extent practicable."(p24)

The document states that the lake sediments contain a huge reservoir of mercury, that internal (lake) sources of mercury probably contribute as much to the water mercury levels as external sources, that the mercury, although settling on the bottom, is not sequestered but continually resuspended (p22), producing the obvious conclusion that unless the sediments are either physically removed (dredged) or effectively isolated from the water column, the mercury problem will never be eliminated. It points out that the lake sediments are also huge reservoirs

1

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or CPOIs, some of which, being found throughout lake bottom sediments, are resistant to biodegradation (p23), again indicating that they must either be dredged or effectively isolated in order to cease to be a problem. In view of the statements by the NYSDEC that active remediation is necessary (p39) and that the NCP expects that the remedy will employ treatment as a principal element (p19), it would appear that underwater isolation by capping, even were it to be "effective", is less satisfactory than dredging, because only dredged sediments would be available for treatment.

A couple of other points of interest, to which I will refer later, are the document's statements that the ultimate fate of most of the sediments is "burial" within the profundal sediments, although, as the document pointed out above, these are not really buried, and that the sources of contamination in the littoral (shoreline) zones of the lake are also sources of contamination to the profundal zone, as defined by the document (p32), and that the lake "is underlain by a thick layer of soft, unconsolidated sediments(p14) with a profundal nearshore shelf that is relatively steep(p32.)

With regard to methodology:

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Four of the five RAOs, as outlined on p40, all speak of eliminating or reducing, "to the extent practicable" various chemicals or the hazardous effects of those chemicals.

Although it would seem to be rather apparent that the surest way to eliminate or even reduce the effects of the chemicals is to eliminate the chemicals, the document indicates the DEC decided not to aim for elimination but settle for reduction to "site specific risk based levels" (p39) and further that these levels were set by averaging 5 SECs, each of which was associated with a different level of risk for acute toxic effects to benthic organisms to arrive at a PEC, or PECQ. This approach is quite suspect from several points of view. To wit:

1) with respect to "averaging", it will be noted that the PEC for mercury, the example given on p39, is 2.2mg./kg. which is rather close to the ER-M (2.8mg/kg) above which level "toxic effects are likely to occur" and over 4 times higher than the ER-L (0.5mg/kg) below which toxic effects are rarely expected.

Where the proposal relies on capping to achieve a PEC, the cap wouldn't have to be very "leaky" at all to produce levels equalling or exceeding the ER-M.

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2) "The ER-L is more likely to protect the macroinvertebrate community from chronic effects."(p42)

3) with respect to acute vs toxic effects, the document points out that even though it is known that (p12) chronic exposure to at least some of the chemicals is known to produce significant toxicity, "insufficient data" were available to develop SECs for chronic toxicity. The document even admits that "the mean...methodology does not explicitly address chronic toxicity" but claims that, where contaminated littoral segments would be capped, "**assuming the cap is effective** in keeping levels below PECs" chronic toxicity would be reduced.

How can the Dept. assume that capping, even if it works to keep levels below PECs, will have any significant effect at all in reducing chronic toxicity when a) ER-Ls are more

likely to protect against chronic toxicity, b) PECs are, by definition higher than ER-Ls, and perhaps, as in the case of mercury, considerably so, c) even if the cap works to keep levels below the PECs, the ER-Ls may be routinely exceeded, d) even if the ER-Ls, for acute toxicity are not exceeded, the Dept. cannot say anything at all about the worth of its chosen proposal with regard to chronic effects because it doesn't, apparently, have any idea what a PEC (even assuming PEC is a legitimate goal - see 1)) for chronic toxicity would be, let alone whether capping would work to achieve it.

With regard to mechanism:

As far as I am able to determine, Alternatives 2 through 5, involve remediating only those areas of the lake bed that exceed certain PEC or PECQ values. The rest of the lake bed will remain untouched even though it may have contaminant values which considerably exceed ER-Ls (see above). In addition, whatever dredging will be done will be done, not to achieve the PEC or PECQ levels but simply to debulk, to varying degrees, the contaminated areas, relying on caps instead to keep surface sediment levels at or below the PEC. And the extent of dredging seems to be determined not on the basis of what % of contaminants it would be a good idea to remove, but only to the extent necessary to either ensure no loss of lake surface area, reduce erosive forces on the cap, or "meet a particular natural resource goal" and "maintain littoral zone function"(p49). The exception to this appears to be with regard to NAPLs, wherein the alternative recommended (#4), as well as #5, 6, and 7, specifically seems to call for dredging to the depth (30 ft.) where NAPLs may possibly exist (p49) which is considerably deeper than what loss of lake surface area or reduction of erosive forces would require, as in alt. 2&3. This would seem to suggest that with regard to NAPLs, the Dept doesn't have much confidence that its capping mechanism would work to keep NAPL concentrations at "acceptable" levels, even with the "additional 50%" thickness "safety factor"(p52). Why trust the cap for other contaminants? Why dredge NAPLs out and leave considerable amounts of other contaminants behind?

The document also states that slope stability(p49), at least in the region of the ILWD, is an important consideration in determining the extent of dredging operations, in order to insure the stability of a cap. But, considering that, as noted above, lake bed sediments are soft and, at least in portions of nearshore slopes in several of the littoral SMUs as well as of the profundal SMU, slopes are relatively steep, is it not reasonable to assume that the effect of the dredging operations themselves might be to decrease the stability of these slopes, increasing the possibility of "slumping" or landslides in other areas of the lake, which, by the documents admission, threatens the Integrity of any cap placed in unstable areas. Shouldn't slope stability be a concern in these areas as well, especially where, as in #4, the Dept. is relying on the cap to prevent contamination? Yet #4 discusses these "geotechnical concerns" only with respect to the ILWD. And, even here, as noted above, the Dept. apparently doesn't trust its own ability to adequately address these concerns with regard to its ability to adequately cap NAPLs - #4 proposes, basically, dredging to a depth where NAPLs might "possibly" exist.

One could have a similar discussion of the capping mechanism, where multiple

8 assumptions exist. The document points out that groundwater upwelling may prevent the cap from providing complete chemical isolation. It states that targeted dredging would be used in those areas where upwelling velocities are high(p48), but it also states that for capping to be effective, hydraulic control systems would need to be in place to minimize velocities. Obviously, for either mechanism to even theoretically work, groundwater flow patterns and velocities would have to remain within the limits of the capping models when all dredging, capping, etc. operations not only in the lake but in the surrounding remediation areas as well are completed. Can the Dept. ensure this will be so? And, should the patterns change, or the velocities increase, which, considering the extent and nature of the operations, is not out of the realm of possibility, the models, on which the entire operation is based, would be faulty, perhaps fatally so. Another aspect of the cap design is the extent to which the "bioturbation" would affect the effectiveness of the cap. Ironically, to the extent that the initial cap succeeds in decreasing contamination, the benthic community may thrive to the extent that bioturbation activities may exceed the model parameters, decreasing or even eliminating the effectiveness of the isolation layer.

10 With respect to effectiveness of alternatives to meeting Objectives/Goals

A) Overall Protection of Human Health and the Environment

There is little more that needs to be said than what the document itself states (p64+):

"Since Alternative 7 includes thin layer capping throughout all of SMU 8 as well as aeration, it would be the most effective alternative in achieving RAOs 1 and 3. In addition, Alternative 7 would meet BSQV for mercury on a lakewide basis and in SMU 8, and it would be the most effective at meeting RAOs 2, 4, and 5 and PRGs 1, 2, and 3 since it would address all areas meeting the ER-L."

"All of the alternatives which employ capping would be protective to the extent that the cap functions properly.In the event of a failure, the impacts would be expected to be greatest under those alternatives that involve capping of the greatest mass/highest concentrations of contaminants.Alternative 7 would be the most protective alternative because it would result in the further reduction of surface concentrations."

"...in regard to SMU-1, the level of protectiveness increases progressively from Alternative 2 through Alternative 7 (with the exception of Alternative 5...)."

"In regard to contaminant mass removal" (with regard to NAPL in SMU 2) "...Alternatives 6, and 7, which consist of full removal to the cleanup criteria for the littoral zone SMUs (...except.. SMU 5), an additional level of long-term protectiveness would be achieved through sediment removal instead of capping."

B) Compliance with ARARs

"Alternatives 6 and 7 might reduce water column concentrations" (of mercury) "to a greater degree than Alternatives 2, 3, 4, and 5."

C) Long-Term Effectiveness and Permanence

"Alternatives 6 and 7 provide the greatest long-term effectiveness and permanence by removal of all of the sediment that exceeds the cleanup criteria from SMUs 1 through 7 (...except... SMU

5). Consolidation and disposal in an aboveground facility area (i.e. SCA) is more proven, easily maintained, and easily monitored compared to capping of wastes and contaminated sediments in an underwater environment. This makes it more reliable. For those sediments that are removed to a more secure location..., the remedial action is more permanent than capping within the lake.as the volume of material being removed and disposed of in the SCA increases, the permanence of the alternative increases."

D) Reduction of Residual Risk

"Alternative 7 would remediate all areas of the lake exceeding the ER-Ls and there fore would result in the lowest residual risk of acute and chronic toxicity."

E) Adequacy and Reliability of Controls

"Alternatives 6 and 7 provide the greatest long-term effectiveness of controls since these alternatives remove the the largest volumes of contaminated sediment and place them in a secure SCA.The greater the amount of sediment that is removed, the more permanent and reliable is the alternative."

F) Reduction of Toxicity, Mobility, or Volume through Treatment

Considering that the Dept. recognizes the EPA's preference for treatment as a principal remedy, and, considering that, in recommending Alt. 4, which relies on dredging rather than capping in dealing with NAPLs, it is sending a clear signal that it doesn't really consider capping to be "treatment", so again, it points out that Alt.s 6 and 7 do not involve isolation capping, but instead would "remove all contaminated sediments down to their respective cleanup criteria in the littoral zone (except for areas in SMU 5). And, as between Alt. #6 and #7, recall that the "cleanup criteria" for #7 (to ER-Ls) is more stringent than for #6 (to PEC/PECQs), which is more likely to be protective against chronic toxicity. So, for other than aeration, the only sediments that would be available for "treatment" would be those removed (dredged) from the lake, bringing us back again to #7 as the best alt. of the 7 presented,

G) Implementability

Although the document states that with regard to construction of the SCA for Alt. 6 and 7 would be "challenging because of its size" and "might stretch the limits of the ability to design and contain the dredge spoils on nearby Honeywell properties (emphasis added), it also points out that "aquatic capping presents challenges not typically associated with capping of upland sites" and that "monitoring the conditions and effectiveness of an aquatic isolation cap is not routine relative to monitoring an upland containment cell such as an SCA." In other words, although, as stated above, SCAs are more permanent and reliable for dealing with sediments than underwater capping of these same sediments, Honeywell might have to secure additional areas for the dredgings or cart them away.

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H) Cost

Alternative #4 - \$451,000,000

Alternative #7 - \$2,157,000,000

After spending a good deal of the document explaining the toxicity of the lake

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contaminants, the need for remediation, the preference for treatment, which capping will not accomplish, the extent and duration of Honeywell's contribution to the contamination and why, for almost all the relevant criteria of environmental and human health criteria, reliability, permanence and effectiveness, Alt. #7 is clearly preferable to Alt. #4, the document then summarily declares that the Dept. prefers #4 and spends about 1 page explaining why. This explanation basically says that Alt. #4 is better or as good as Alt. 2, 3, 5, and 6 for various reasons. It never rescinds its previous conclusions regarding the superiority of #7 and only mentions #7 with regard to cost, and even then it says(p81) that "While Alternatives 6 and 7 would provide greater long term effectiveness than Alternative 4.....", that because the volumes of material removed might have to be moved offsite or require additional SCAs, the "incremental costs" incurred would "not be cost effective"!

After all these years and studies and loss of our lake, the DEC is now telling us that, even though it knows that the remedy it "prefers" is not as good or as permanent or as reliable or as effective as another remedy it knows about and has studied, it will nevertheless pick that lesser remedy because the much better one would cost the perpetrator of all this mess more money to clean up!

Gentlemen, you must be kidding!

In case the above statement is not strong enough, suffice it to say that I strongly disapprove of any remedy that does not clean the gunk out of the Lake! We can do better than #4. You know it and so does anybody who reads your document. We want our lake back and we want to make it clear that anybody who messes it up must clean it up, no matter what it costs him. If you stick with anything less than #7 (and perhaps even more is required), you will make it clear that the "E" in DEC has precious little to do with the Environment.

Yours truly,

Susan P. Hammond, MD
Susan P. Hammond MD
102 Elaine Ave.
N. Syracuse, NY 13212

Gentlemen - on re reading this document,
I realize that in addition to typos, the
points I'd attempt to make are not as clear
as I would like them to be - but
I have run out of time - Given more time
I am quite sure that my condemnation
would be even more successful! - SPH 4/25/05
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