



453-12

US Army Corps of Engineers

**Toxic and Hazardous
Materials Agency**

FINAL

**COMMUNITY RELATIONS PLAN
SENECA ARMY DEPOT
ROMULUS, NEW YORK**

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Prepared for:

**U.S. ARMY TOXIC AND HAZARDOUS MATERIALS AGENCY
Public Affairs Office
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GLOSSARY

AMC	U.S. Army Materiel Command
AMCPA	Chief of Public Affairs, Army Materiel Command
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act (Commonly called 'Superfund.') Was enacted in 1980; and focuses on closed waste site problems, spill responses and issues of liability and cleanup funding. It was reauthorized in October 1986 (see SARA).
CRP	Community Relations Plan
DEC	Department of Environmental Conservation
DEH	Directorate of Engineering and Housing
DESCOM	U.S. Army Depot System Command
DOD	U.S. Department of Defense
EPA	U.S. Environmental Protection Agency
ESE	Environmental Science and Engineering, Inc. (Hunter/ESE)
FS	Feasibility Study - An analysis of the practicability of a proposal; e.g., a description and analysis of the potential cleanup alternatives for a site or alternatives for a site on the National Priorities List (NPL). The Feasibility Study usually recommends selection of a cost-effective alternative. It usually starts as soon as the remedial investigation is underway; together they are commonly referred to as the "RI/FS." The term can apply to a variety of proposed corrective or regulatory actions.
HND	Huntsville Division, U.S. Army Corps of Engineers
HQDA	Headquarters, Department of the Army

GLOSSARY (Continued)

IAG	Interagency Agreement - The IAG is a negotiated agreement between the EPA and the lead federal agency. In Seneca's case, that federal agency is the U.S. Army. In addition, states are encouraged to participate in the IAG. IAGs govern the coordination between the lead agency and EPA, establish mutually agreed upon timeframes for actions, and designate each party's responsibilities for action.
IIA	Initial Installation Assessment - The IIA, sometimes called 'Installation Assessment,' consists of a records search as well as interviews to assess environmental quality with regard to use, storage, treatment, and disposal of toxic and hazardous materials. They are used as a screening tool to define any conditions which might adversely affect health and welfare, or result in environmental degradation.
IRP	Installation Restoration Program
M&E	Metcalf and Eddy Engineers
MAIN	Chas. T. Main, Inc.
NPL	National Priorities List - The prioritized list of sites to be remediated under CERCLA. Priorities are established using a hazard ranking system based on each relative potential hazard to public health and the environment.
OB/OD	Open burning/open detonation grounds
OCLL	Office of the Chief of Legislative Liaison
OCPA	Office of the Chief of Public Affairs
OSWER	Office of Solid Waste and Remedial Response

GLOSSARY (Continued)

PAO	Public Affairs Officer
PEP	Propellants, explosives, and pyrotechnics
RCRA	Resource Conservation and Recovery Act
RI	Remedial Investigation - A Remedial Investigation is an in-depth study designed to gather the data necessary to determine the nature and extent of contamination at an NPL (or Superfund) site. It establishes criteria for cleaning up the site, identifies preliminary alternatives for remedial actions, and supports the technical and cost analyses of the alternatives. The remedial investigation is usually done with the feasibility study. Together they are usually referred to as the "RI/FS."
ROD	Record of Decision - A Record of Decision is a public document that explains which cleanup alternative(s) will be used at NPL sites.
SARA	Superfund Amendments and Reauthorization Act
SEAD	Seneca Army Depot
T12DCLE	trans-1,2-dichloroethene
TCE	Trichloroethene
TOC	Total organic carbon
TOX	Total organic halogen
USAEHA	U.S. Army Environmental Hygiene Agency
USATHAMA	U.S. Army Toxic and Hazardous Materials Agency
VOC	Volatile organic compound

1.0 OVERVIEW OF COMMUNITY RELATIONS PLAN

This Community Relations Plan (CRP) for Seneca Army Depot (SEAD) is designed to provide for information exchange between Army, Federal, State, and community agencies and the public regarding environmental restoration activities at the Depot. Community relations activities will be handled under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Superfund Amendments and Reauthorization Act (SARA) of 1986, and according to the Interagency Agreement (IAG) between the U.S. Army, the U.S. Environmental Protection Agency (EPA), and New York State Department of Environmental Conservation (DEC).

The CRP's goal is to inform and to establish two-way communication between the installation and residents of surrounding communities regarding environmental studies being conducted at SEAD in conjunction with scheduled Remedial Investigation/Feasibility Studies (RI/FSs) of the installation, which was placed on the EPA's National Priorities List (NPL) on July 13, 1989. The ash landfill and open burning/open detonation (OB/OD) grounds at the facility are of particular environmental concern. Note that separate RI/FSs are being conducted for these areas. There are other areas at SEAD under investigation, and their remediation, if necessary, will be added. These areas typically include storage areas, construction and demolition debris areas, fill areas, boiler plants, sewage treatment plants, paper incinerators, fire training areas and waste oil tanks. This CRP has been prepared to reflect public involvement for all areas of remediation at SEAD. Additional goals of this CRP are to keep residents and workers at SEAD and of the surrounding communities knowledgeable of planned and ongoing activities at SEAD, and to provide a means whereby citizens and agencies can interact with SEAD and Huntsville Division, U.S. Army Corps of Engineers (HND) staff and assist in resolving issues of public interest and concern.

The primary purposes of the CRP are to:

1. Provide for the exchange of information regarding the RI/FSs for areas of environmental concern at SEAD.

2. Solicit input, comments, and active involvement from the public, on-post work force, elected and civic leaders, and concerned agencies regarding the program.
3. Provide a centralized point of contact for the public to express concerns and propose an effective communications network for distributing desired information regarding environmental matters at SEAD.

This plan outlines the public involvement objectives; prescribes specific policies and procedures governing public involvement activities related to environmental and remedial actions; assigns responsibility for planning and implementing program functions; and presents suggested communication activities and techniques to be exercised in meeting program goals. Specific goals and objectives are presented in Section 4.0.

2.0 CAPSULE SITE DESCRIPTION

2.1 INSTALLATION LOCATION

SEAD is located in the Finger Lakes region of central New York State, on the west side of the highland separating Seneca and Cayuga Lakes, approximately 40 miles south of Lake Ontario in the towns of Romulus and Varick, in Seneca County (see Figure 2-1). Surrounded by sparsely populated farmland, other nearby communities include Geneva, Waterloo, Seneca Falls, Fayette, Ovid, Lodi, and Interlaken. New York State Highways 96 and 96A adjoin SEAD on the east and west boundaries, respectively. The Depot covers 10,600 acres.

2.2 INSTALLATION HISTORY

SEAD has been owned by the U.S. Government and operated by the Department of the Army since 1941. Since its inception, SEAD's primary mission has been the receipt, storage, maintenance, and supply of military items, which currently include ammunition and explosives, General Services Administration strategic and critical materials, and Office of Civil Defense engineering equipment. Some ammunition and explosives are disposed of by burning and controlled detonation, when necessary. Other activities at the installation include the performance of depot-level maintenance, demilitarization, and surveillance of conventional ammunitions.

SEAD is an active military installation; therefore, entry and exit are monitored 24 hours a day by armed Department of Defense (DOD) personnel. Access to SEAD is limited to military personnel and civilian employees. The installation currently employs approximately 800 civilian and 500 military personnel.

The landfill area is located midway along the western boundary of SEAD. From 1941 to 1974, uncontaminated trash was burned in a series of burn pits located east of the existing incinerator building (Building 2207) (Hunter/ESE, 1990). Between 1974 and 1977, materials intended for disposal were transported to the incinerator. Ashes and other residues from the incinerator were temporarily stored in an earthen pit on the northeast corner of the facility. When the pit was filled, the ashes and residues were removed,

transported, and buried in the adjacent landfill. The incinerator was destroyed by a fire in 1979, and the landfill operation has subsequently ceased. In addition, the site was covered by soil.

The 90-acre demolition area, OB/OD grounds, encompasses a detonation area and nine burning pads located in the northwest corner of SEAD. These pads have been used for burning propellants, explosives, and pyrotechnics (PEP) (MAIN, 1990). The practice of open burning on these pads has been discontinued. The last open burn was performed in 1985. The OB/OD grounds include the 30 acres of the burning pads and adjacent area. Entry to the OB/OD grounds is restricted via a locked gate, and the area is patrolled by armed DOD personnel.

2.3 ENVIRONMENTAL STUDIES - PREVIOUS SITE INVESTIGATIONS

Numerous areas of known or suspected waste disposal at SEAD were delineated in the U.S. Army Toxic and Hazardous Materials Agency (USATHAMA) (1980) Initial Installation Assessment (IIA). This investigation consisted of a records search and interviews conducted with present and former SEAD employees. As a result of this investigation, the former incinerator and landfill area was initially recognized as having a potential for groundwater contamination. Figure 2-2 shows the vicinity of the former landfill and burning pit areas.

2.3.1 Ash Landfill

The ash landfill area contains a number of potential sources of contamination, including:

- A former incinerator used to incinerate trash between 1974 and 1979.
- The former cooling pond associated with the incinerator facility.
- An adjacent former landfill area, used for ash disposal between 1974 and 1979, extending to the north and east of the incinerator.

- Former burn pits used to burn uncontaminated trash from 1941 to 1974 and located within the landfill areas immediately north of the incinerator building.
- An underground storage tank.
- A debris pile.
- Cooking grease pits.
- A possible solvent dump.
- Former construction debris and disposal area.

After the initial report, the U.S. Army Environmental Hygiene Agency (USAEHA) conducted a monitoring program including installation of monitoring wells in the landfill vicinity. From 1980 to 1987, USAEHA installed 15 wells in the area and collected samples for volatile organic compound (VOC) analysis. The study concluded that a definite contamination plume with two main constituents--trichloroethene (TCE) and trans-1,2-dichloroethene (T12DCLE)--could be delineated. Chloroform, 1,2-dichloroethane, vinyl chloride, and a floating product that appeared to be diesel fuel were also detected.

SEAD instituted a sampling program for surface water and privately owned off-post wells. No groundwater contamination was detected in the sampled off-post wells. However, surface water sampling indicated that volatile contamination may have extended to surface water and migrated off post. It was suggested that the off-post surface water contamination may be due to contaminated groundwater seeping to the surface.

In August 1988, Environmental Science and Engineering, Inc. (ESE) (now Hunter/ESE) prepared an update of the IIA for USATHAMA and recommended that a site investigation be conducted at the former landfill, burn pit, and incinerator. USATHAMA undertook a site investigation for the landfill area from September 1988 to February 1989.

A recently completed site investigation of the landfill area has documented the existence of a narrow plume of groundwater contamination that is believed to extend to, and possibly beyond, SEAD's western boundary (Hunter/ESE, 1990). The contaminants

of concern are the chlorinated VOCs T12DCLE, TCE, and, to a lesser extent, 1,2-dichloroethane, vinyl chloride, and chloroform.

A supplemental RI/FS will be performed at the ash landfill facility. The purpose of this current project is to supplement the existing data base, determine the magnitude of environmental contamination, and define appropriate remedial actions if required.

2.3.2 OB/OD Grounds

Subsequent to the IIA, a five-phase evaluation was begun in 1981 at the OB/OD grounds (MAIN, 1990). Seven groundwater monitoring wells were installed in 1981. Six monitoring wells were installed along the perimeter of the site. One well was located between the detonation ground and the burn pads. Groundwater monitoring began in January 1982, with quarterly analysis for metals and explosives during the first year. No toxic metals or explosives were detected. Monitoring of these original wells continues.

The Phase 2 study, performed in 1982, attempted to determine total explosive and metal content in soils and residues. It concluded that metals did not present a hazard, and recommended that no additional studies be conducted.

During 1984, USAEHA conducted an additional investigation. The study confirmed the presence of toxic metals and explosives and determined the vertical and horizontal extent of these contaminants.

The RI/FS of the OB/OD grounds will determine the nature and extent of environmental impacts if any exist, and will evaluate and propose the most appropriate remedial action, if an action is required.

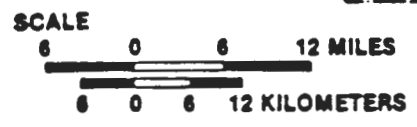
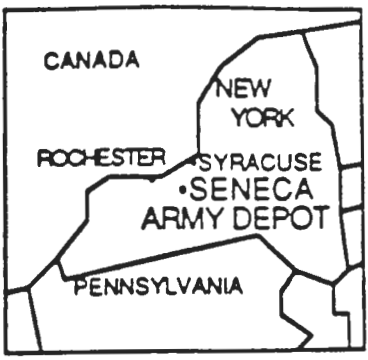
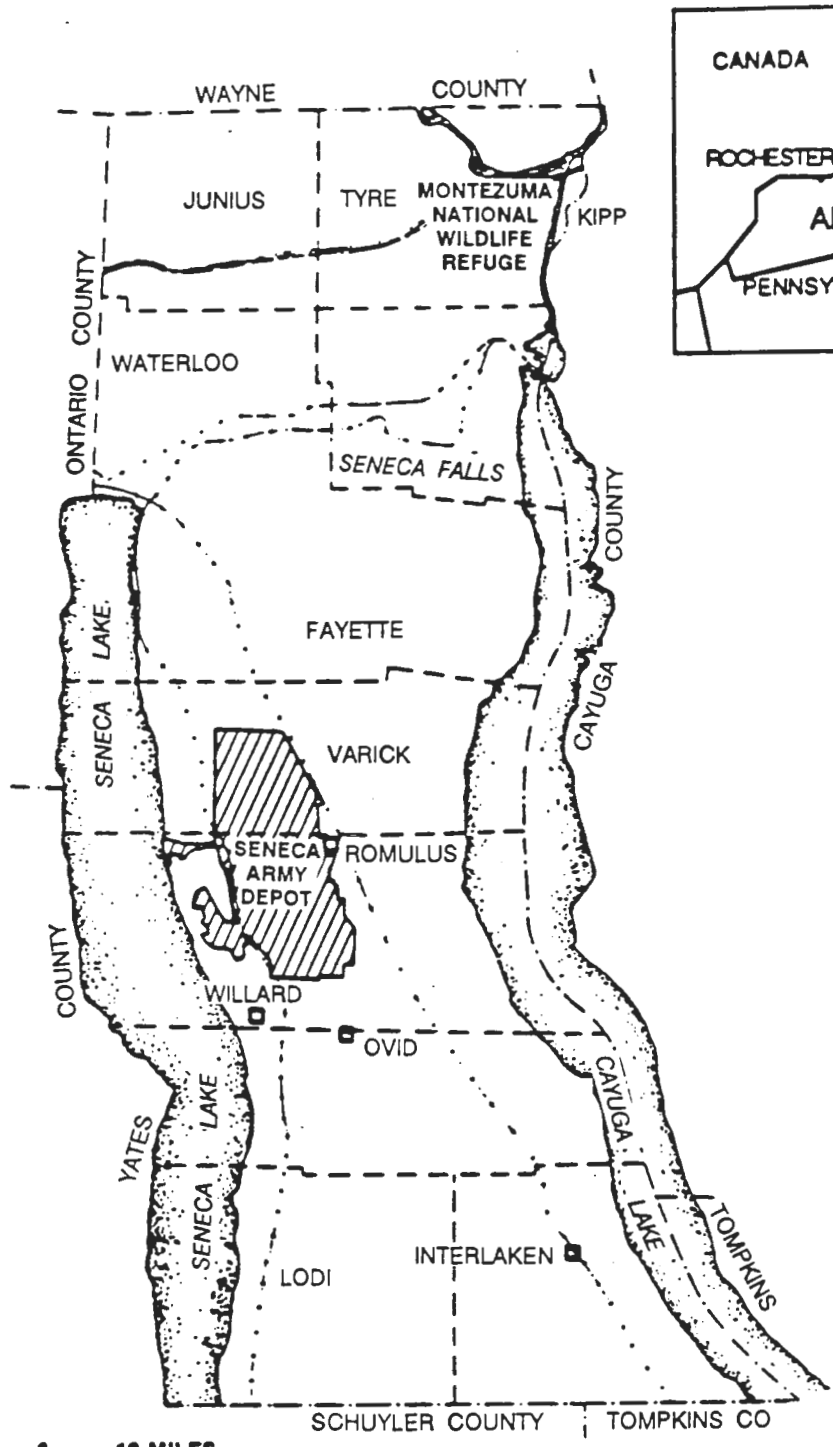


FIGURE 2-1
LOCATION OF SENECA ARMY DEPOT

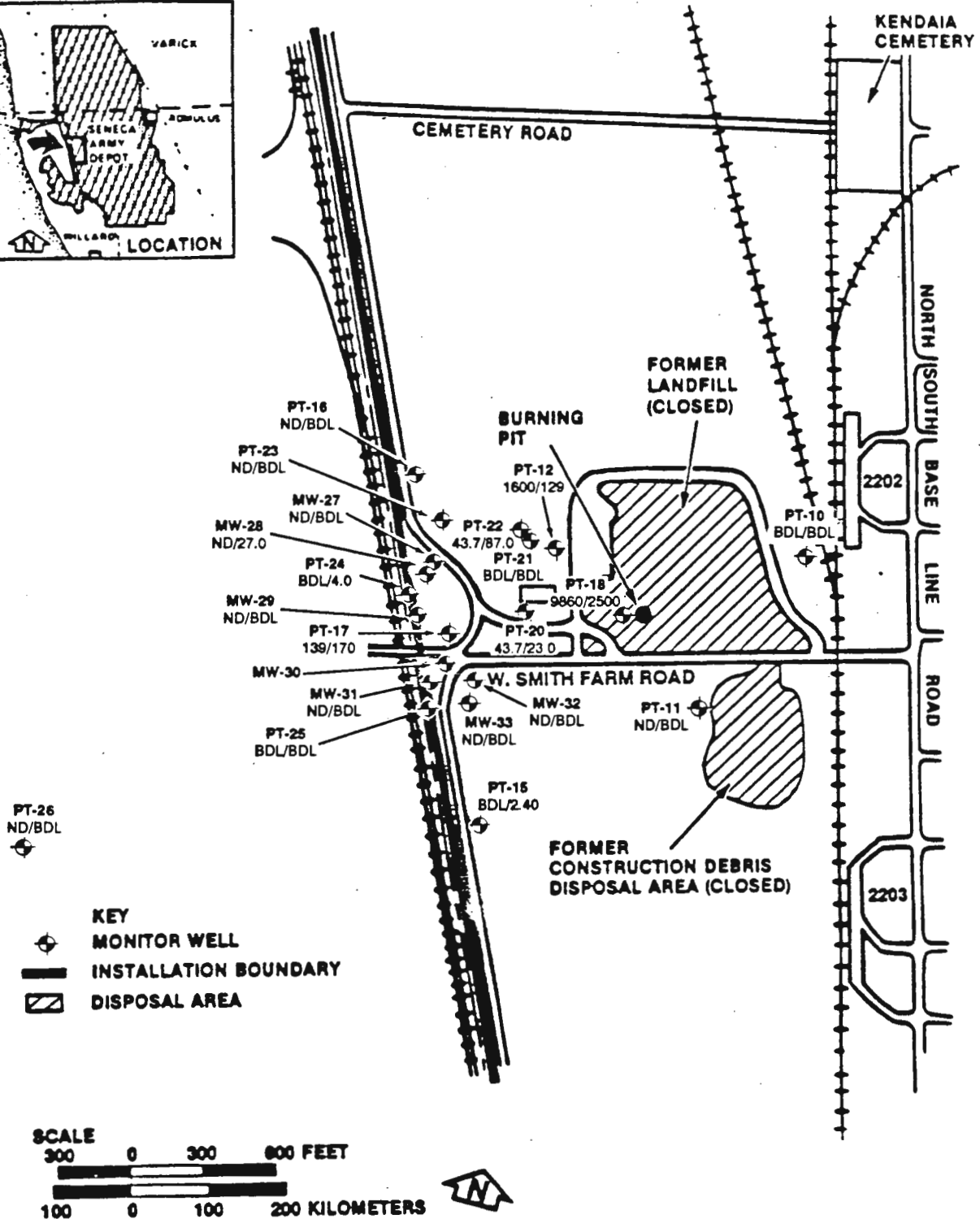
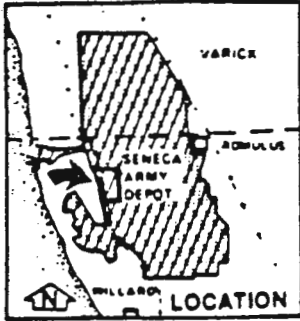


FIGURE 2-2
VICINITY OF THE FORMER LANDFILL AND
BURNING PIT AREAS

3.0 COMMUNITY BACKGROUND

3.1 COMMUNITY DEMOGRAPHICS AND EMPLOYMENT

SEAD is located in the Finger Lakes region of central New York State in Seneca County (population of 33,700). The installation is encompassed by the Town of Romulus (population of 2,464) and the Town of Varick. Other nearby communities include Geneva, Waterloo, Seneca Falls, and Fayette to the north, and Ovid, Lodi, and Interlaken to the south. There is a strong sense of local patriotism and history. Waterloo is the nationally recognized birthplace of Memorial Day (1866), commemorated by the Memorial Day Museum on Main Street, and Seneca Falls gained fame as the Birthplace of Women's Suffrage. The first Women's Rights Convention was held there in 1848, organized by two Seneca Falls residents--Elizabeth Cady Stanton and Amelia Bloomer.

Seneca County is bordered by Seneca Lake to the west and Cayuga Lake to the east, which are joined by the Seneca-Cayuga Canal. Surrounding areas are easily accessible via the New York State Thruway (I-90), and Routes 5 and 20--which run east and west--and Routes 89 and 96--which run north and south.

The county is governed by a board of supervisors. Each town has one supervisor and a board of trustees, and each village has a mayor and a board of trustees. Towns, villages, and counties are governed within the framework of the New York State constitution and laws.

Seneca County's principle business is agriculturally related industry and service. The work force comprises more than 14,000 men and women. The Finger Lakes region is also home to the East's major winery district. Seneca Army Depot employs approximately 1,000 civilian and military personnel. Other major employers include The Willard State Psychiatric Center, Evans Chemetics, and Gould Pumps Inc.

3.2 COMMUNITY INVOLVEMENT HISTORY

SEAD is regarded as a good neighbor by most residents of the surrounding communities. This was expressed by a number of individuals during community interviews conducted December 4 through 6, 1990, as part of the CRP process (see Sections 1.0 and 3.4). The installation's economic and employment contributions to the local communities and Seneca County are well known. Local residents were encouraged to learn of SEAD's continued interest in the environment and believe the installation is capable of handling its environmental problems.

Interaction between SEAD and the local communities reaches beyond employment and economics. Although community access to SEAD is limited (because it is a closed installation), the Commander holds regular luncheons with town supervisors and other local government officials and is a member of the Seneca County Chamber of Commerce. The Commander also works with the Seneca County Industrial Development Agency. In the past, the installation has held an open house for local residents that included a slide presentation explaining SEAD's mission.

To date, communications with SEAD residents and citizens of off-post communities, regarding past and ongoing environmental assessment studies at SEAD, consist of:

1. A press release in The Ithaca Journal announcing that SEAD had been added to the EPA's Superfund List.
2. A press release in The Finger Lakes Times announcing that SEAD had been listed on the State of New York's registry of inactive hazardous waste disposal sites.
3. A conversation with the town supervisors held by the Commander, Col. Frank Cochran, on July 6, 1990.
4. Community interviews conducted by HND and Dames & Moore between

December 4 and 6, 1990, with business leaders, community leaders, and citizens living in the vicinity of the installation.

During the community interview process, some individuals expressed their hope for better communications between the installation and the communities in the future. Protests are not uncommon near SEAD, with the Women's Peace Encampment, which was particularly active in the early 1980s, located near the main gate. Most local residents, however, expressed their overall support for the installation.

3.3 AVAILABLE MEDIA RESOURCES

The SEAD area is served by media from the surrounding communities of Geneva, Seneca Falls, and Ovid, as well as from the larger, more-distant towns of Rochester and Syracuse.

Newspapers in SEAD's vicinity are published both daily and weekly. Daily newspapers distributed in the SEAD area include The Finger Lakes Times, The Rochester Democrat-Chronicle, and The Syracuse Times-Herald. The Reveille and The Ovid Gazette are published weekly. Local shoppers also are published weekly.

Local television coverage available in the SEAD area includes the three major networks--WROC (CBS) Channel 8, WOKR (ABC) Channel 13, and WHEC (NBC) Channel 10 from Rochester, and WTVH (CBS) Channel 5, WIXT (ABC) Channel 9, and WSTM (NBC) Channel 3. PBS stations include WXXI (Channel 21) from Rochester and WCNY (Channel 24) from Syracuse. Cable television is available on a subscription basis.

Providing the area with a variety of programming formats are several local radio stations--WSFW, WNYR, WGVA, and WECQ.

A list of names, addresses, and phone numbers of the newspapers, television stations, and radio stations is presented in Appendix A.

3.4 COMMUNITY INTERVIEW PROGRAM

To identify the attitudes and concerns of regional residents concerning SEAD's mission and ongoing environmental studies, community interviews were conducted by

representatives of HND and Dames & Moore between December 4 and 6, 1990. These interviews were conducted with citizens living near the installation and with community, political, and business leaders. A listing of those interviewed is maintained in the SEAD Directorate of Engineering and Housing (DEH) office. Interviews were held at private homes and businesses, over the telephone, and in public office buildings. Eighteen individuals were interviewed over the 3 days. Figure 3-1 provides the list of questions that the participants were asked. A summary of the interviewees' responses to each question are listed in Section 3.5.

3.5 COMMUNITY ISSUES AND CONCERNS

Interviews and community research activities conducted by HND and Dames & Moore, December 4 through 6, 1990, indicated that environmental issues at SEAD are considered to be a high priority with the residents living in the vicinity. Approximately half (eight of 18) of the interviewees were aware of environmental studies underway at the installation, and had become aware as a result of conversations with the installation commander.

The main concerns of residents in the SEAD area are possible groundwater contamination and water quality, and those who expressed concern are very interested in being kept informed of the monitoring results. Two interviewees mentioned there was some concern in the local communities about a seemingly high rate of cancer in areas near the installation, but overall residents are comfortable with the presence of the installation and feel its benefits far outweigh any risks.

All individuals who participated in the interviews mentioned the local speculation about the storage of nuclear weapons at SEAD. This is an ongoing issue; however, the installation can neither confirm nor deny the presence of such weapons because of Department of Defense policy.

A recent chemical spill at SEAD--cleaned up without incident--was mentioned by several individuals during the interview process. Residents expressed confidence in the way SEAD handled the cleanup.

Along with environmental issues, residents noted that economics (including taxes)

and education were also high priority issues in the area.

The individuals who participated in the interviews preferred the local newspapers and direct mailings of summary status reports written in layman's language as the means of informing people of significant events. The majority did not feel that community meetings would be beneficial, but many wanted a contact person at SEAD identified to answer questions and take public comments. They stressed that the contact's telephone number should be widely publicized.

FIGURE 3-1

Seneca Army Depot
Romulus, New York
Community Interviews

Name: _____

Address: _____

City/State: _____

Telephone: _____

Wish to join Mailing List? Yes ___ No ___

1. When did you first become aware that environmental studies were being conducted at Seneca Army Depot?

2. What have you heard about the environmental studies?

3. What contacts have you had with government officials about the environmental studies?

4. Do you feel these officials have been responsive to your concerns?

FIGURE 3-1 (cont'd)

5. Do you have any concerns about Seneca Army Depot or the planned environmental studies?

6. How can Seneca Army Depot best provide you with information concerning the environmental studies?

Newspaper _____
TV _____
Radio _____
Information Repositories _____
Suggested Location _____
Direct mailing ____
Telephone Hotline ____
Briefings ____
Informal Community Group Workshops ____
Other ____

7. What type of information would be most useful to you?

Technical ____
Status Reports ____
Other ____

8. How frequently would you like to receive information?

Monthly ____
Quarterly ____
Yearly ____
Whenever Newsworthy Events Occur ____
Other ____

9. What is the best way of receiving the community's concerns/comments and responding to them? What method do you feel would be best?

FIGURE 3-1 (cont'd)

10. Has anyone contacted you to express concern about the environmental studies, and if so, what were their concerns?

11. Can you suggest any other individuals or groups that should be contacted for additional information or to identify other types of concerns?

12. Is there anything you wish to mention that we have not yet discussed?

4.0 HIGHLIGHTS OF THE SEAD COMMUNITY RELATIONS PROGRAM

4.1 GOALS AND OBJECTIVES

As stated in Section 1.0, the goal of the SEAD CRP is to provide an effective mechanism for communication and the exchange of information among SEAD, the local communities, onsite military and civilian employees, U.S. Army, and diverse Federal, State, county, and local agencies.

This CRP has the following specific objectives:

1. Ensure the public understands that personal and community health and interests are of paramount concern to the U.S. Army and SEAD.
2. Keep local residents; SEAD employees and residents; and Federal, State, county, and local officials informed in a timely manner of major findings of the RI/FSs to be conducted at SEAD.
3. Provide local residents; on-post employees and residents; and Federal, State, county, and local regulatory officials an opportunity to review and comment on the studies to be conducted at SEAD and on suggested remedial action alternatives and decisions.
4. Keep SEAD and the Army sensitive to and informed about changes in community concerns, attitudes, information needs, and activities regarding SEAD, and use their concerns as factors in evaluating modifications of the CRP as necessary to address these changes.
5. Effectively serve the community's information needs and address citizen inquiries through prompt release of factual information through the media and other information dissemination techniques.
6. Effectively respond to the needs of the media by providing timely response to inquiries and requests for interviews and briefings, thereby encouraging fair and accurate reporting of RI/FS activities at SEAD.

7. Create and maintain, through an active public affairs program, a climate of understanding and trust with the aim of providing information and opportunities for comments and discussion.
8. Ensure that appropriate Federal, State, county, and local elected officials are informed of results of the investigations and recommended remedial actions, as required by the IAG.
9. Provide a single entity for dissemination of information for the matters regarding the progress of the contamination assessments, remedial actions, and other decisions at SEAD, as required by the IAG.
10. Identify issues and potential areas of concern and develop and implement objective means to avoid or resolve conflict.

4.2 RESPONSIBILITIES

Responsibilities for implementing the CRP are shared by SEAD and personnel of other U.S. Army agencies. Names, agencies, addresses, and phone numbers of CRP public affairs contacts and technical points of contact are presented in Appendix B. The following responsibilities are established for implementation of the SEAD CRP:

1. Office of the Chief of Public Affairs (OCPA), Department of the Army (HQDA)
 - a. Coordinates media statements or visits concerning the SEAD RI/FSs that have national significance with appropriate HQDA staff elements, the Army Environmental Office, and Office of the Secretary of Defense, Public Affairs, as appropriate.
 - b. Coordinates other notification actions with appropriate HQDA staff elements, as necessary.
 - c. Coordinates release of any SEAD RI/FS information at the national level with the U.S. Army Materiel Command (AMC).

- d. Acts as the point of contact for responding to and providing guidance for all national and policy-type information questions.
2. Office of the Chief of Legislative Liaison (OCLL), HQDA
- a. Coordinates with OCPA notification of appropriate Congressional delegations prior to national release of SEAD RI/FS matters, as well as other Congressional notifications, as necessary.
3. Chief of Public Affairs, Army Materiel Command (AMCPA)
- a. Coordinates release of any SEAD RI/FS information with HQDA OCPA, U.S. Army Depot System Command (DESCOM), HND, and SEAD project manager/on-scene coordinator.
 - b. Coordinates with HND and DESCOM in advance of Congressional and Gubernatorial notifications.
 - c. Provides additional guidance and assistance in support of this plan as required.
 - d. With assistance from the AMC Legislative Liaison, provides and updates, as needed, a listing of Congressional members and appropriate candidates for use in distributing informational materials. (The list should also include non-New York Congressional members on House and Senate environmental committees who are likely to have an interest in the SEAD RI/FSs).
4. Chief of Public Affairs, DESCOM
- a. Supports the Commander, SEAD, in implementing the overall public involvement and response program at SEAD.
 - b. With the assistance of the HND Public Affairs Office, develops and implements the SEAD CRP to provide timely and accurate information throughout all stages of the RI/FSs to ensure the public the opportunity to review and comment on the selection of proposed

remedial actions and to remain sensitive to changes in community concerns.

- c. Provides public affairs support for the SEAD RI/FS public affairs/public involvement and response program, as needed.
- d. Coordinates actions with the SEAD Public Affairs Officer (PAO).
- e. Receives approval authority from the Commander, SEAD.

5. HND PAO

- a. In coordination with DESCOM, provides, as required, public affairs guidance and expertise to support the public involvement program concerning the SEAD environmental site investigations and remedial actions.
- b. In coordination with DESCOM and SEAD, prepares news releases for use at major milestone achievements during progress of the site investigations and remedial activities.
- c. Refers to DESCOM for clearance and/or coordination of all materials intended for public release, which has not been previously cleared or specifically authorized for release in the SEAD CRP or in subsequent statements and public affairs plans.
- d. Informs DESCOM of any queries, releases, or proposed media visits to SEAD concerning this program.
- e. Coordinates all Congressional queries and responses with DESCOM, SEAD, and other agencies as required.

6. Commander, SEAD

- a. Responsible for implementation of CRP.
- b. Reviews and approves news releases and fact sheets.

- c. Provides final approval of contents of materials being presented to civic group meetings and selection of staff members to participate in or present the program.

7. SEAD (PAO) - Commander's Representative

- a. Serves as the on-the-scene spokesperson for the SEAD program and responds to media queries using statements prepared in coordination with HND or as otherwise appropriate.
- b. Coordinates with DESCOM, HND, and all appropriate U.S. Army/Federal agencies all queries, releases, public briefings, tours, or requests for visits pertaining to the SEAD IRP.
- c. Coordinates with DESCOM and HND all responses to queries, prior to release, concerning SEAD matters that require release of information not previously cleared for release.
- d. Provides DESCOM, HND, and others as determined by the Commander of SEAD copies of all SEAD-released material and copies of newspaper clippings relating to SEAD IRP activities or events.
- e. Coordinates through DESCOM and HND all notifications to the media and to city, county, State, or Federal officials. Distributes fact sheets, reports, project updates, and other pertinent information to repositories and the media when appropriate/newsworthy (information provided by HND PAO).
- f. Maintains at SEAD a file of dated newspaper clippings relating to the SEAD RI/FS (newspapers listed in Appendix A should be monitored for this purpose).
- g. Plans, coordinates, and makes presentations concerning the RI/FS activities to area and regional civic groups.

- h. Plans, schedules, and coordinates all necessary requirements for implementation of community meetings.
 - i. Plans and coordinates onsite tours of study sites.
 - j. Responsible for direct distribution of special notices to SEAD work force of urgent items that may require immediate notification.
 - k. Performs quarterly inspections of SEAD information repositories to ensure that appropriate materials are available and updated for public use as stated to the media and local communities.
 - l. Informs DESCOM and HND of any queries or proposed media visits to SEAD concerning the environmental program.
8. SEAD Directorate of Engineering and Housing (DEH)
- a. Executes directives of Commander, SEAD, in fulfilling Army's roles in the CRP.
 - b. Reviews news releases and fact sheets being produced jointly by SEAD and HND.
 - c. Assists in planning and presentation of programs to civic groups.
 - d. Assists in preparation, scheduling, and implementation of community meetings.
 - e. Maintains list of individuals interviewed for preparation of this CRP.

5.0 COMMUNICATION ACTIVITIES AND TECHNIQUES

The primary elements to ensure success in a public involvement program are development of an information network with relevant communities and a constructive mechanism for public participation in the program. To develop, maintain, and enhance public involvement, the SEAD CRP takes an active approach to identifying and addressing public concerns about environmental issues at the Depot.

Essential to building and maintaining public trust is a communications system by which relevant and accurate information is made available to local citizens, SEAD personnel, State and Federal regulators, and the media in a timely and responsible manner. Sections 5.1, 5.2, and 5.3 present methods and techniques for implementing such a system, and Figure 5-1 presents a recommended schedule for some of these activities.

5.1 LOCAL COMMUNITY AND MEDIA COMMUNICATION TECHNIQUES

To expand communications and ensure effective interactions between the U.S. Army and SEAD residents, workers, and local communities, the following public involvement techniques are recommended:

1. Fact Sheets/News Releases--Fact sheets and news releases will be distributed to those on the mailing list, SEAD neighbors, citizen groups, regulatory officials, elected/civic officials, and installation, local, and regional media whenever events warrant. At a minimum, news releases will be made upon award of contract for the RIs, and upon initiation of the actual work on the RIs. Both news releases and fact sheets will be prepared and released upon completion of the RIs, completion of the FSs, and upon issuance of the Record of Decision (ROD). Such fact sheets relating to the FSs must describe the alternatives considered and offer the U.S. Army's

preferred alternative for public comments. An updated fact sheet must be prepared after the agency selects remedial alternatives.

Fact sheets/news releases in general will be directed to address the concerns as expressed by local communities and will include status of studies and remedial actions, updates on schedules, and special interest items. Other fact sheets will be issued on an as-needed basis. The fact sheets and copies of news releases will also be placed in the information repositories.

2. Public Notice of Availability of Proposed Plan and Preparation of Responsiveness Summary. The Proposed Plan, a document which summarizes remedial alternatives presented in the RI/FS and identifies the preferred alternative and the reason for its selection, will be prepared at the conclusion of the Feasibility Study (FS). A paid display advertisement will be published announcing the availability of the Proposed Plan, the length of time for public comment, and a brief plan summary. The documents will be made available in the Administrative Record repositories. Following the public comment period, a Responsiveness Summary of significant comments to the plan made by the public, and SEAD's responses to those comments will be prepared and becomes part of the Record of Decision (ROD).
3. Publication of Notice of Record of Decision. A paid display advertisement will also be published informing the public the ROD has been signed, and will indicated the selected remedial action plan. This notice will be published before any remedial actions are begun.
4. Mailing List -- A mailing list, consisting of those individuals who participated in community interviews and indicated they wished to be placed on a mailing list; elected officials; regulators; media, both print and

electronic; and other individuals who by whatever means indicate they wish to be added to the mailing list, will be used to reach the widest possible public with fact sheets, news letters and updates concerning SEAD's remediation process. The mailing list, minus the names of private citizens, is at Appendix C. It may expand throughout the remediation depending on the level of interest shown by the community.

5. Response to Inquiries--The SEAD PAO will serve as a contact point for direct calls from citizens seeking information on the studies. The SEAD PAO, working in conjunction with the Commander and SEAD DEH, and with assistance from HND, will be responsible for coordinating and directing responses to the community inquiries.
6. Programs for Civic Groups/Organizations--Slide and informational programs can be presented to civic groups at their regularly scheduled meetings upon request. The mission, history, and economic significance of SEAD, as well as the environmental studies, should be included in the programs.
7. Special Briefings--When appropriate, special project briefings will be held by the Commander, SEAD, with local officials to review project goals and accomplishments. Such meetings could be held at the SEAD Officers' Club at a time mutually acceptable to the Commander, SEAD, and officials of the respective local communities. If more practical, attendance at local town meetings to provide briefings may be arranged. Such briefings would provide an information pool for elected leaders to use when inquiries are directed to them from their constituents on matters relating to the SEAD investigations. Names, addresses, and phone numbers of elected officials are presented in Appendix C. Such meetings will be coordinated by the SEAD PAO with logistical and technical support provided by HND on an as-needed basis.
8. Information Repositories and Administrative Record Repositories--Information Repositories are places where documents and information

pertaining to the environmental study at SEAD are stored and made available for public inspection and copying. The information repository is established to ensure the public has access to documents such as the CRP, RI/FS Work Plans, the RI/FSs, responsiveness summary, ROD, fact sheets, remedial design, and news releases. The Administrative Record is a file that is maintained and contains all information used by the lead agency (in this case SEAD) to make its decision on the selection of a response action under CERCLA. This file is to be made available for public review and a copy is to be established at or near the site, usually at one of the information repositories. A duplicate file is held in a central location, such as an EPA Regional Office or a state office.

During the interview process, several locations were suggested by interviewees for information repositories--Edith B. Ford Memorial Library in Ovid, the South Seneca Central School Library, the Romulus Central School Library, the Geneva Free Library, and the Seneca County Office Building in Waterloo. However, the only public library close to the SEAD is in Ovid, N.Y. It has very limited hours. Therefore, the Romulus Town Hall was selected as the best choice for the information repository, since it is close to the depot, provides copying machines, and security for documents, and is accessible during business hours. Community residents felt that several repository locations would be more effective because of the number of communities involved. The address, phone number, contact, and operating hours of the selected information repository are presented in Appendix D.

9. Community Meetings--Locations have been identified where SEAD and HND staff can hold public meetings with local citizens to discuss project activities. It is recommended that meetings be held in cities adjacent to SEAD. Details of meeting sites are presented in Appendix F. Such meetings will be jointly coordinated by the PAO and the Commander, SEAD, with logistical and technical assistance provided by HND. Interest

in such meetings has been expressed by most participants in the community interviews, though some felt this may not be the most effective technique. The time and agenda of such meetings will be determined by SEAD.

10. Technical Review Committee -- Technical Review Committee Meetings. These meetings will be held quarterly, and more frequently if necessary, and will include representatives of SEAD, U.S. Army Depot Systems Command, U.S. Army Corps of Engineers Huntsville Division, US E.P.A. Region II, N.Y. State Department of Environmental Health, N.Y. State Department of Environmental Conservation, and community members from the town of Romulus, N.Y. The Technical Review Committee is a group formed in accordance with CERCLA/SARA provisions which state TECHNICAL REVIEW COMMITTEE. - WHENEVER POSSIBLE AND PRACTICAL, THE SECRETARY (of Defense) SHALL ESTABLISH A TECHNICAL REVIEW COMMITTEE TO REVIEW AND COMMENT ON DEPARTMENT OF DEFENSE ACTIONS AND PROPOSED ACTIONS WITH RESPECT TO RELEASES OR THREATENED RELEASES OF HAZARDOUS SUBSTANCES AT INSTALLATIONS. MEMBERS OF ANY SUCH COMMITTEE SHALL INCLUDE AT LEAST ONE REPRESENTATIVE OF THE SECRETARY, THE ADMINISTRATOR, AND APPROPRIATE STATE AND LOCAL AUTHORITIES AND SHALL INCLUDE A PUBLIC REPRESENTATIVE OF THE COMMUNITY INVOLVED. THESE PERSONNEL WILL MEET TO REVIEW OVERALL PROJECT STATUS, CONCERNS, ACCOMPLISHMENTS, UPCOMING ACTIVITIES, AND SCHEDULE."

Other techniques that are recommended, when appropriate, include:

1. Good Neighbor Program--Property owners and renters of lands adjacent to SEAD are mailed updates on site investigations and proposed remedial actions, whenever deemed appropriate by SEAD and HND.

2. Onsite Tours--Tours may be held on an as-needed basis with local citizens, local and State officials, Congressional representatives, and the media. The Commander, SEAD, and SEAD PAO will determine when such tours are beneficial to enhancing public understanding of the investigations, and the tour will be organized by the SEAD PAO with assistance, if necessary, from HND.
3. Technical Assistance Grants (TAG) Information --
As part of the Superfund program, EPA is providing communities with an opportunity to apply for Technical Assistance Grants. These grants of up to \$50,000. per site are designed to enable community groups to hire a technical advisor or consultant to assist them in interpreting and commenting on the findings and the planned cleanup. Citizens who are interested in the Technical Assistance Grants program may obtain an application package by calling or writing:

Marilyn Fast
Technical Assistance Grants Coordinator
U.S. EPA, Region II
26 Federal Plaza, Room 1714
New York, New York 10278
(212) 264-9860

5.2 SEAD EMPLOYEE COMMUNICATION TECHNIQUES

The following methods will be adopted to inform employees and residents of SEAD of the status of the RI/FSs:

1. All fact sheets, articles, news releases, and pertinent information will be posted throughout the installation on easily accessible bulletin boards, including high traffic areas, and will be published in the SEAD newspaper.
2. All program-related documents, reports, news releases, fact sheets, and general information will be available for employees to review at the SEAD

Administration Building. Hours of operation and other pertinent information regarding information repositories are shown in Appendix E.

TASK	PROJECT MILESTONES							
	AWARD OF RI	INITIATE RI	COMPLETE RI	AWARD OF FS	INITIATE FS	COMPLETE FS/ PROPOSED PLAN	ROD	START OF REMEDIAL ACTION
COMMUNITY RESEARCH AND INTERVIEWS	●							
NEWS RELEASES	●	●	●			●	●	
INFORMATION REPOSITORIES				<i>Ongoing</i>				
UPDATE MAILING LIST				<i>Ongoing</i>				
PUBLIC MEETING OPPORTUNITIES		●	●			●		
PUBLIC COMMENT PERIOD			●			●		
RESPONSIVENESS SUMMARY						●	●	
FACT SHEET			●			●	●	
EMPLOYEE MEETINGS	●			●		●		
MEETINGS WITH ELECTED OFFICIALS				<i>If Necessary</i>				
REVISE CRP							●	

FIGURE 5-1
SCHEDULE FOR COMMUNITY
INVOLVEMENT ACTIVITIES AT SEAD

APPENDIX A

Media List

MEDIA LIST

NEWSPAPERS

Editor
The Finger Lakes Times
218 Genessee Street
Geneva, New York 14456

Editor
Rochester Democrat/Chronicle
55 Exchange Boulevard
Rochester, New York 14614

Editor
Syracuse Post Standard
P.O. Box 4915
Clinton Square
Syracuse, New York 13221

Editor
Syracuse Herald-Journal
P.O. Box 4915
Clinton Square
Syracuse, New York 13221

Editor
Syracuse Herald-American
P.O. Box 4915
Clinton Square
Syracuse, New York 13221

Editor
Ovid Gazette
P.O. Box N
Trumansburg, New York 14886

The Reveille
P.O. Box 557
27 State Street
Seneca Falls, N.Y. 13148

NEWSPAPERS (cont'd)

Editor
Reveille
P.O. Box 557
State Street
Seneca Falls, New York 13148

Regional Editor
Times-Union
55 Exchange Street
Rochester, N.Y. 14614

New Editor
Ithaca Journal
123 W. State Street
Ithaca, N.Y. 14850

New Editor
The Review
P.O. Box 404
Interlaken, N.Y. 14886

Odyssey Publications
Trumansburg, N.Y. 14886

The Associated Press
55 Exchange Street
Rochester, N.Y. 14614

United Press International
207 Midtown Plaza
Rochester, New York 14604

MEDIA LIST (cont'd)

TELEVISION

News Director
WOKR-TV Channel 13 (ABC)
P.O. Box L
Rochester, New York 14623

News Director
WHEC-TV Channel 10 (CBS)
191 East Avenue
Rochester, New York 14604

News Director
WIXT-TV Channel 9 (ABC)
5904 Bridge Street
E. Syracuse, New York 13057
(315) 446-4780

News Director
WTVH-TV Channel 5 (CBS)
1030 James Street
Syracuse, New York 13202
(315) 425-5555

News Director
WSTM-TV Channel 3 (NBC)
1030 James Street
Syracuse, New York 13203
(315) 474-5000

News Director
WSYT-TV Channel 68 (FOX)
1000 James Street
Syracuse, New York 13203
(315) 472-6800

New Director
WCNY-TV Channel 24 (PBS)
P.O. Box 2400
Syracuse, New York 13220
(315) 453-2424

TELEVISION (cont'd)

News Director
WROC-TV Channel 8 (NBC)
201 Humboldt Street
Rochester, New York 14610

News Director
WUHF-TV Channel 31 (FOX)
360 East Avenue
Rochester, New York 14604

News Director
WXXI-TV Channel 21 (PBS)
P.O. Box 21
Rochester, New York 14601

News Director
WGRC-TV Channel 5
71 Mount Hope Avenue
Rochester, N.Y. 14620

RADIO

WGVA (AM)/WECQ (FM)
3568 Lennox Road
Geneva, New York 14456

WFLR (FM)
30 Main Street
Dunde, New York 14837

WSFW (FM)
P.O. Box 608
Seneca Falls, New York 13148

WNYR (AM)/WAQX (FM)
P.O. Box 95
Syracuse, New York 13250

News Director
WXXI-AM
280 State Street
Rochester, N.Y. 14614

APPENDIX B
Public Affairs Contacts
and
Technical Points of Contact

PUBLIC AFFAIRS CONTACTS AND TECHNICAL POINTS OF CONTACT

Public Affairs Contacts

1. Department of the Army
Office of the Chief of
Public Affairs
Attn: OCPA-PP
(Mr. Harvey Perritt)
Washington, D.C. 20310-
1509
(202) 695-5732
2. Commander
U.S. Army Materiel Command
Attn: AMCPA (Ms. Faith
Faircloth)
5001 Eisenhower Avenue
Alexandria, Virginia 22333-
0001
(703) 274-8013
3. Commander
U.S. Army Depot System
Command
Attn: AMSDS-PA, Penn Hall
Chambersburg, Pennsylvania
17201-4170
(717) 267-9280 or 8471
4. Commander
U.S. Army Toxic and
Hazardous Materials Agency
Attn: CETHA-PA
(Ms. Elizabeth Sergeant)
Aberdeen Proving Ground,
Maryland 21010-5401
(410) 671-2556
5. U.S. Army Corps of Engineers,
Huntsville Division
Attn: CEHND-PA (Ken
Crawford)
106 Wynn Drive
P.O. Box 1600
Huntsville, AL 35807-4301
(205) 955-5740 or 5742
6. Commander
Seneca Army Depot
Attn: SDSSE-PAO
(Jerry Whitaker)**
Romulus, New York 14541-
5001
(607) 869-1235
7. EPA, Region II
Lillian Johnson
Superfund Community
Relations
Coordinator
Office of Public Affairs
26 Federal Plaza
New York, New York 10278
(212) 264-4534
8. New York Department of
Environmental
Conservation (DEC)
Attn: Mr. Daniel W. Rourke
50 Wolf Road
Albany, New York 12233-
7010
(518) 457-0849/1-800-324-9296

**Primary SEAD Public Affairs Point of Contact. All activities will be coordinated through this office.

**PUBLIC AFFAIRS CONTACTS AND
TECHNICAL POINTS OF CONTACT (cont'd)**

Technical Contacts

1. Department of the Army
Environmental Office
Attn: CEHSC-E
(Mr. Larry Barb)
Washington, D.C. 20310-
2600
(202) 272-0591
2. Commander
U.S. Army Materiel Command
Attn: AMCEN-A
(Mr. Pete Cunanan)
5001 Eisenhower Avenue
Alexandria, Virginia 22333-
0001
(703) 274-9016 or 9389
3. Commander
U.S. Army Depot System
Command
Attn: AMSDS-IN-E
(Mr. Timothy Toplisek)
Chambersburg, Pennsylvania
17201-4170
(717) 267-8926
4. Commander
U.S. Army Toxic and
Hazardous
Materials Agency
Attn: CETHA-IR-A
(Ms. Karen Wilson)
Aberdeen Proving Ground,
Maryland 21010-5401
(301) 671-2270
5. U.S. Army Corps of
Engineers,
Huntsville Division
Attn: CEHND-ED-PM
(Mr. John Romeo)
106 Wynn Drive
Huntsville, Alabama 35807-4301
(205) 955-5801
6. Seneca Army Depot
Director of Engineering and
Housing
Attn: SDSSE-H
(Mr. Gary Kittell)
Romulus, New York 14541-5001
(607) 869-1309
7. EPA, Region II
Attn: ERRD-PSB
(Ms. Miriam Martinez)
26 Federal Plaza, Room 2930
New York, New York 10278
(212) 264-1841
8. New York Department of
Environmental
Conservation (DEC)
Bureau of Eastern Remedial
Action
Division of Hazardous Waste
Remediation
Attn: Mr. Kamal Gupta
Room 208
50 Wolf Road
Albany, New York 12233-7010
(518) 457-3976

**PUBLIC AFFAIRS CONTACTS AND
TECHNICAL POINTS OF CONTACT (cont'd)**

9. New York State Department
of Health
Bureau of Environmental
Exposure Investigation
ATTN: Mr. Kim Mann
Albany, N.Y. 12203
1-800-458-1158, Ext.402

APPENDIX C
Mailing List

MAILING LIST

Seneca County Health Department
31 Thurber Drive
Waterloo, New York 13165

Chairman, Seneca County
Chamber of Commerce
2022 Routes 5 & 20 West
Seneca Falls, New York 13148

Seneca County Industrial
Development Agency
P.O. Box 109
Waterloo Road
Seneca Falls, New York 13148

Field Representative for
Congressman Horton
20 Leland Drive
Seneca Falls, New York 13148

Principal, South Seneca
Central School
1670 North Miller Road
Lodi, New York 14860

American Cancer Society
30 State Street
Seneca Falls, New York 13148

Seneca County Soil and Water
Conservation
12 North Park Street
Seneca Falls, New York 13148

Interim Superintendent
Romulus Central School
5705 Main Street
Romulus, New York 14541

ELECTED OFFICIALS

U.S. Senators

Senator Alfonse D'Amato
520 Hart Senate Office Building
Washington, D.C. 20510

Local Offices

1259 Federal Office Building
100 South Clinton Street
Syracuse, New York 13260

415 Federal Office Building
100 State Street
Rochester, New York 14614

Senator Daniel Patrick Moynihan
464 Russell Senate Office Building
Washington, D.C. 20510

Local Offices

214 Main Street
Oneonta, New York 13920

Suite 203
Guarantee Building
30 Church Street
Buffalo, New York 14202

U.S. Representative

Rep. Frank Horton
2108 Rayburn House Office Building
Washington, D.C. 20515

Local Offices

314 Keating Building
100 State Street
Rochester, New York 14614

307 Metcalf Plaza
144 Genesee Street
Auburn, New York 13021

Wayne County Courthouse
26 Church Street
Lyons, New York 14489

MAILING LIST (cont'd)

Governor

Mario Cuomo
Executive Chamber
Albany, New York 12224

State Senator

John R. Kuhl, Jr.
Room 802 LOB
Albany, New York 12224

Local Office

18 Buell Street
P.O. Box 153
Bath, New York 14810

State Assemblyman

Michael F. Nozzolio
Room 544 LOB
Albany, New York 12224
(518) 455-5655

Local Offices

80 Fall Street
Seneca Falls, New York 13148

33 William Street
Auburn, New York 13021

Mayors

Jack P. Starr
47 Castle Street
Geneva, New York 14456

Harold Potts
Box 56
Lodi, N.Y. 14860

William Larson
Box 217
Interlaken, N.Y. 14847

Robert G. Freeland
P.O. Box 108
Seneca Falls, N.Y. 13148

Kenneth Patchen
13 West Main Street
Waterloo, N.Y. 13165

Paul O'Connell
West Seneca Street
Ovid, N.Y. 14521

Town Supervisors

Eugene Baer
Town Supervisor, Town of Lodi
1907 Smith Road
Lodi, New York 14860

Ms. Peg White
Town Supervisor, Town of Waterloo
64 Church Street
Waterloo, New York 13165

William D. Leonard
Town Supervisor, Town of Junius
1193 State Route 318 Nine Waterloo,
New York 14433

Albert A. Capacci
12 Van Rensselaer Street
Seneca Falls, New York 13148

Robert Favreau
Town Supervisor, Town of Ovid
P.O. Box 384
South Main Street
Ovid, New York 14521

MAILING LIST (cont'd)

Town Supervisors (cont'd)

Kenneth Strafford
Town Supervisor, Town of Varick
4646 Locust Lane Road
Geneva, N.Y. 14456

Edward L. Barto
Town Supervisor, Town of Fayette
4163 Seybolt Road
Seneca Falls, N.Y. 13148

Arthur C. Poulseh
Town Supervisor, Town of Covert
8208 State Route 96
Interlaken, New York 14847

F. Hamilton White III
Town Supervisor, Town of Tyre
1182 Black Brook Road
Seneca Falls, New York 13148

Albert B. Nivison
Town Supervisor, Town of Romulus
P.O. Box 203
1345 Main Street
Willard, New York 14588

APPENDIX D
**Location of Selected Information Repository/
Administrative Record Repository**

APPENDIX D

Location of Selected Information Repository/ Administrative Record Repository

NOTE: The **Administrative Record** is a file which is maintained and contains all information used by the lead agency to make its decision on a response action under CERCLA. This file must be available for public review near the site, usually at an information repository. A duplicate file is held in a central location, such as a regional EPA office.

The **Information Repository** is a file containing current information, technical reports, and reference documents regarding a Superfund site. Information repositories must be convenient for local residents.

Romulus Town Hall
1435 Prospect Street
Willard, New York 14588
(607) 869-9326

Hours: Mon. - Fri., 8 a.m. - 4:30 p.m.

Contacts: Ms. Joan Hamilton/Mr. Albert Nivison

APPENDIX E
Suggested Locations for Community Meetings

SUGGESTED LOCATIONS FOR COMMUNITY MEETINGS

Seneca Army Depot Officers' Club
Seneca Army Depot
Romulus, New York 14541-5001
(607) 869-1666

Contact: Tom DeSio
Capacity: 125
Cost: No charge
Lead Time: 2 weeks

Holiday Inn
Routes 414
Waterloo, New York 13165
(315) 539-5011

Contact: Gloria Hoefler
Capacity: 250-300
Cost: \$100
Lead Time: 1 month

Romulus Central School
Auditorium
5705 Main Street
Romulus, New York 14541
(607) 869-5391

Contact: Bonnie Saunders
Capacity: 500
Cost: \$20
Lead Time: 2 Weeks

South Seneca Central School
Main Street
Ovid, New York 14521
(607) 532-8395

Contact: Gary Alger
Capacity: 200
Cost: Custodial fee
Lead Time: 1 month

Romulus Town Hall
1435 Prospect Street
Willard, New York 14588
(607) 869-9326

Contact: Joan Hamilton
Capacity: 150-200
Cost: No charge
Lead Time: 1 week

REFERENCE LIST

- Hunter/ESE, 1990. Draft Final Work Plan, Remedial Investigation/Feasibility Study, Ash Landfill, Seneca Army Depot, prepared for U.S. Army Corps of Engineers, Huntsville, Alabama.
- Main, Chas. T., Inc. (MAIN), 1990. Draft Work Plan, Remedial Investigation/Feasibility Study, Open Burning/Open Detonation Grounds, Seneca Army Depot, prepared for U.S. Army Corps of Engineers, Huntsville, Alabama.
- U.S. Army Toxic and Hazardous Materials Agency (USATHAMA), 1980. Installation Assessment of Seneca Army Depot, Report No. 157, AMXTH-IR-A-157.
- U.S. Environmental Protection Agency (USEPA), 1988. Community Relations in Superfund: A Handbook, Interim Version, EPA/540/G-88/002, Office of Emergency and Remedial Response, Washington, D.C.

S. Alisolom

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-7010



Thomas C. Jorling
Commissioner

SEP 5 1991

Mr. Randall Battaglia
Environmental Coordinator
Department of the Army
Seneca Army Depot
Romulus, NY 14541

Re: Seneca Army Depot NY ID No. 850006
Draft Community Relations Plan

Dear Mr. Battaglia:

The New York State Department of Environmental Conservation (NYSDEC) has reviewed the above document and provides the following comments:

1. Section 3.4 of the draft plan says "community interviews" were conducted last December to "identify the attitudes and concerns of regional residents concerning SEAD's mission and ongoing environmental studies...". These interviews, it says, were conducted among nearby residents, and community, political and business leaders. Eighteen people were interviewed. Although it isn't stated there, I'm assuming those are the 18 people listed on the mailing list on p. D-2.
 - a) Why were only 18 people interviewed? Is such a small sample really representative of the entire affected/interested population?
 - b) How were these 18 selected? An inordinate number seem to be "leaders" rather than residents. Several are from Seneca Falls and Waterloo - villages far removed from the SEAD facility.
 - c) Only eight of the 18 people interviewed were aware of "environmental concerns" at SEAD. That means the majority were responding to questions they couldn't honestly answer (e.g., Questions 1-4 of the survey, Fig. 3-1).

If the interview results were the foundation for the development of this plan and which should be according to 40 CFR Part 300 NCP (see Federal Register dated March 8, 1990, page 8786, 2nd paragraph), then the basis of the plan is questionable. The interviewed sample was too small, it doesn't accurately represent the population and, as a whole, the sample wasn't informed enough to offer meaningful, useful, opinion.

We are uncomfortable with the sweeping conclusions the Army has drawn about community issues and concerns (Section 3.5 and Section 3.2, first paragraph) based upon this survey's results. We would rather see a more exhaustive, more scientific survey done of the community. A first step would be the identification of those people potentially most affected by the site. NYSDEC Regional Community Relations office will be happy to assist the Army in this endeavor.

- 2. Section 5.1. Fact Sheets/News Releases, defines when and how fact sheets and news releases will be distributed. According to Figure 5-1, news releases will be distributed at the first three milestones and again at the last two. This is appropriate; but why not distribute fact sheets at the same time? We shouldn't rely on the media to deliver the message to the public.
- 3. Section 5.1.6. Community Meetings: It appears that before the completion of a remedial investigation, the interaction between the community and SEAD will be through news releases and possibly through fact sheets (see Comment No. 2). In order to involve the community more in the whole process of the RI/FS, to address their concerns, and to discuss main features of the upcoming RI, a public meeting should be scheduled before the start of a remedial investigation.
- 4. Appendix A is the media list. There should be a few addition to it.
 - a) Newspapers: Regional Editor, Times-Union, 55 Exchange Street, Rochester, New York 14614; News Editor, The Review, P.O. Box 404, Interlaken, New York 14847; The Associated Press, 55 Exchange Street, Rochester, New York 14614; United Press International, 207 Midtown Plaza, Rochester, New York 14604.
 - b) Television: News Director, WGRC-TV 5, 71 Mt. Hope Avenue, Rochester, New York 14620.
 - c) Radio: News Director, WHAM-AM, 207 Midtown Plaza, P.O. Box 40400, Rochester, New York 14604; News Director, WXXI-AM, 280 State Street, Rochester, New York 14614.
- 5. Appendix B should include the 1991 article in the Rochester Democrat and Chronicle Newspaper on the Seneca Army Depot environmental investigations.
- 6. Appendix C: (i) The New York State Department of Health (NYSDOH) should be included in the list of Public Affairs and Technical contacts given on Pages C-2 and C-3; contacts for the DOH for inclusion on Pages C-2 and C-3 are:

Technical Contact
 NYS Dept. of Health
 Bureau of Environmental Exposure
 Investigation
 2 University Place
 Albany, New York 12203
 Attn: Mr. Lloyd Wilson
 1-800-458-1158, ext. 402

Public Affairs Contact
 NYS Dept. of Health
 Bureau of Toxic Substance
 Assessment
 2 University Place
 Albany, New York 12203
 Attn: Ms. Emmy Thomee
 1-800-458-1158, ext. 308

(ii) The telephone number at Page C-3, item 8, should be corrected. The correct number is (518) 457-3976 instead of (518) 457-3967.

(1)

7. Appendix D: The Seneca County Health Department should be included in the mailing list. The mailing address is:

Seneca County Health Department
Attn: Charles Carroll, P.E.
31 Thurber Drive
Waterloo, NY 13165

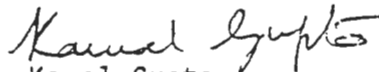
T. No. (315) 539-9294

8. Appendix D gives the mailing list under "Elected Officials" (pp. D-3 and D-4). all the town supervisors in Seneca County are represented, but not the village mayors. The mayor of Waterloo appears as one of the 18 interviewees, but that still leaves unaccounted the mayors of Interlaken, Lodi, Ovid and Seneca Falls. Also, why is the mayor of the distant city of Geneva listed here?
9. Appendix E lists the document repository. We would rather prefer a local library, or some other public facility that offers access during evenings and weekends.

This transmittal constitutes formal closure of NYSDEC's comment period for this document.

If you have any questions, please call me at (518) 457-3976.

Sincerely,



Kamal Gupta
Federal Projects Section
Bureau of Eastern Remedial Action
Division of Hazardous Waste Remediation

cc: S. Absolom, SEAD
G. Kittal, SEAD
C. Struble, USEPA-Region II



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, NEW YORK 10278

S/E/S
10/1/91
W
10/1/91

SEP 28 1991

SEP 28 1991

LB

Mr. Randall W. Battaglia
Environmental Coordinator
Seneca Army Depot
Romulus, NY 14541-5001

Re: Seneca Army Depot Draft Community Relations Plan

Dear Mr. Battaglia:

This is in response to your submission, dated August 5, 1991, to the U.S. Environmental Protection Agency (EPA) of a Draft Community Relations Plan for the Seneca Army Depot which was prepared for the U.S. Army Toxic and Hazardous Materials Agency by Dames and Moore. We received this document on August 9, 1991. EPA comments are as follows:

Page (1-1); three primary purposes are listed for the community relations plan. While these are some of the additional assets which the plan can provide, the primary goal of this document is to acquire a wider depth of knowledge concerning this particular community, and to develop the appropriate responses to their concerns. The document should be revised to reflect this.

Page (2-4); in the last paragraph of the page there is a reference to O'Brien and Gere's recommended closure procedures for the landfill. The entire paragraph should be deleted as it is not the function of the plan to speculate on future remedies, and could be mistaken for actual federal policy or decisions.

Page (3-2); EPA would like some clarification as to why a press release was issued to the Ithaca Journal, but the newspaper was not included as an available media resource on the following page.

Page (3-9) through (3-11); figure 3-1, the questionnaire should be deleted.

29 JUN

EPA may be sending additional comments on this Draft Community Relations Plan within the next two weeks. If you have any questions, do not hesitate to call me at (212) 264-4595.

Sincerely yours,



Carla M. Struble
Federal Facilities Section

cc: G. Kittel, SEAD
K. Healy, USACOE
K. Gupta, NYSDEC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278

NOV 26 1991

Mr. Randall Battaglia
Environmental Coordinator
Seneca Army Depot
Romulus, New York 14541

Handwritten notes: WHAT SHE SAID ABOUT LIST - IT IS NOT STATIC - DYNAMIC -

Re: Seneca Army Depot Draft Community Relations Plan

Dear Mr. Battaglia:

This is in response to your submission to the U.S. Environmental Protection Agency (EPA) of a Draft Community Relations Plan for the Seneca Army Depot which was prepared for the U.S. Army Toxic and Hazardous Materials Agency by Dames and Moore. These comments are in addition to the EPA comments sent to you on September 6, 1991.

Vertical handwritten note: Lack of relationship. STAT cont in FAX

It is recommended that the Army disclose information pertaining to other potential source areas on-site during this phase of community relations activities, while the CERCLA-related activities (the CRP; interviews; establishment of the information repository and Administrative Record; public comment period; responsiveness summary, etc.) will relate directly to the current RI/FS study areas. It would be good public relations for Seneca to discuss the full potential extent of overall sita contamination outside of the present study area.

Vertical handwritten note: THIS IS THE ONLY CRP

Vertical handwritten note: We Remake. To much collect. FAX - Draft Not to much

EPA guidance clearly states that a Community Relations Program needs to be tailored for each community and each site. If additional remedial investigations (RIs) are expected to take place at SEAD in the future, it is advisable to inform the public early in the process (at the same time, care must be taken not to overly alarm the public, or to prematurely alert the public to areas that may not pose a great hazard, or be investigated in the future).

Public hearings (on RI/FS and Proposed Plan), preparation of a Responsiveness Summary, and the issuance of public notice announcing the Proposed Plan and final remediation action plan/ROD are not discussed within the CRP. These activities are required community relations requirements under SARA Sections 113 and 117, NCP Section 300.67, and Superfund Community Relations Policy.

Contact List: The CRP does not present a single list of federal, state, and local officials (including army contacts), environmental groups, etc. The SEAD CRP includes the mailing list which includes these individuals as well as local citizens. Media and technical/

Vertical handwritten notes: Not Required, Not Draft Guidance From 8/11, 11/13, 5/8, 10, Document #, Public Meeting, Public Hearing, No action, one way

public affairs contacts are listed in separate appendices. EPA community relations guidance recommends a single appendix which includes the names, addresses, and telephone numbers of all key contacts. The guidance also recommends that private citizens not be included in the CPR contact list.

recall
DRAFT
FOR
REGULATION
TO
SFB

p. iv

ok

The presentation of a large number of acronyms and abbreviations at the beginning of the document could discourage the nontechnical audience. The public can be overwhelmed by the overuse of acronyms. While the use of acronyms at times cannot be avoided, the Army should limit their use whenever possible.

p. 2-1

rewrt

Section 2.2 *Installation History*: It is stated that some ammunition and explosives are disposed of by burning and controlled detonation, when necessary. It is unclear where this activity occurs. It is later stated (page 2-2, paragraph 2) that open burning ceased in 1985 on the OB/OD grounds. These discrepancies should be clarified.

we need
TO
clarify

The site history section should be tailored to include only that information which is critical to understand why the site is listed on the NPL.

p. 2-2

get that
TO you

Section 2.3 *Environmental Studies*: This section presents a somewhat detailed account of the concerns at the ash landfill and the OB/OD grounds. ~~EPA Community relations guidance recommends that the site description section of the CRP be limited to the historical, geographical, and technical details necessary to show why the site was placed on the NPL.~~

He will
come up with

It is recommended that the detailed information specific to sampling programs and the listing of specific contaminants be eliminated. However, a brief discussion on the potential threat to public health and the environment should be included in this section, as per EPA guidance.

p. 2-4

used

As an example of the previous comment, much of the information in the first paragraph of Section 2.3.2 is not critical for the purposes of the CRP. The public may not comprehend the significance of terminology such as "EP toxicity metals," "total organic carbon/halogen," etc.. This type of discussion would come later in the form of fact sheets.

MEETINGS!

p. 3-3
to 3-7

Section 3.4 *Community Interview Program*: This section provides a summary of the questions and answers obtained during the community interviews. When explaining the results of the community interview program, it would be helpful to provide an overview of the responses with a focus towards those which were most common instead of chopping up the findings into questions and answers, as one would in a responsiveness summary.

p. 3-8

Section 3.5 *Community Issues and Concerns*: The key concerns of area residents get lost in the previous section (*Community Interview Program*). It is recommended that the key concerns be presented by topic with a description of each concern identified during the interviews (e.g., ground water contamination, water quality, impact on health [cancer rates], storage of nuclear weapons, improved communication, etc.).

p. 4-1

Delete the section pertaining to fulfilling requirements of the listed references from "As stated in Section 1.0" up to and including #6. It gives the impression this is being done only because it is required by law as opposed to SEAD having a proactive approach.

p. 5-1

{ Include a discussion in Section 5.1 on hearings to be held, the preparation of the responsiveness summary, and public notices.

NOT FINISHED
CERLAH

p. 5-2

The second paragraph refers to the site mailing list. It is recommended that "development and maintenance of the site mailing list" be listed as a separate activity.

p. 5-3

Item 5 discusses the site information repository. The locations for the repository recommended during the community interview process are listed. The recommendation of community residents that more than one repository be established is also presented. Yet only one information repository was selected (the Town Hall) which was not one of the recommended locations. The rationale behind the selection should be included. Residents are likely to be concerned that their recommendations were not utilized.

OVERLY AMBITIOUS
->CLOSER

p. 5-4 *Good Neighbor Program*: It is unclear whether the "good neighbor program" is already in place. It is also unclear how the updates provided to the property owners and renters of lands adjacent to SEAD will differ from the fact sheets mentioned on page 5-1. } EPA

p. 5-4 *Onsite Tours*: It is unclear if and/or how the proposed tours for citizens, officials, etc. differ from those described under the good neighbor program. } EPA

p. 5-5 *Section 5.3 Agency Communication Techniques*: Some of the information presented in this section may be redundant to previous sections. It is unclear whether the meetings discussed in this section are additional to those mentioned in Section 5.1.

p. 5-7 The "PIRP" mentioned in Figure 5-1 is not defined.

Appendix B: Delete entire section pertaining to newspaper and press releases.

Appendix D: It is not the usual practice to publish the names of private citizens contributing to the community relations plan unless they exist in some sort of representative capacity in the community, with their title or affiliation. The names of private citizens should be eliminated from this appendix.

CAN PUT THEM OUT.
MAKING LIST IS FEASIBLE
EPA
G. COP

This constitutes formal closure of EPA's comment period for the Draft Community Relations Plan dated July 1991. Any further EPA comments regarding this document will only be offered to clarify the written comments in this letter or to address your responses to EPA comments.

If you have any questions, do not hesitate to call me at (212) 264-4595.

Sincerely yours,

Carla M. Struble
Federal Facilities Section

- cc: G. Kittel, SEAD
- K. Healy, USACE
- K. Gupta, DEC
- J. Healey, Alliance

RE THE OVERALL CONCERN of the public - Ambitiousness -
(i) TRC will supplement the CRP effort,
NOT REPLACE it - important.

DRAFT RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)
COMMENTS ON DRAFT COMMUNITY RELATIONS PLAN (CRP)
DATED NOVEMBER 26, 1991

1. GENERAL COMMENT:

USEPA's Comment:

* *see that AR-200-2 states that public participation activities will begin at the initiation of the RI/FS, unless a situation develops during the PA/SI that would dictate further modification.*

"...It is recommended that the Army disclose information pertaining to other potential source areas on site during this phase of community relations activities ... If additional remedial investigations (RI's) are expected to take place in the future, it is advisable to inform the public early in the process..."

SEAD's Recommendation:

a. At the direction of the USEPA, Seneca feels that a limited amount of information should be disclosed regarding other potential source areas. Details regarding individual Solid Waste Management Units (SWMU's) should be avoided at this stage. Additionally, the Army should not be forced to speculate at the Preliminary Assessment (PA) stage of SWMU investigation, whether or not Remedial Investigation/Feasibility Studies (RI/FS's) will be required in the future. In short, Seneca believes that there is little need for organized community relations activities at the PA phase; in support of this assertion, see OSWER Directive 9230.0-3B p. 4-2.

Since the Site Investigation (SI) stage is one step closer to a possible RI/FS, the Army may want to consider issuing a fact sheet or news release as soon as a SI investigation concludes that a RI/FS is warranted. The CRP Public Involvement Schedule should be revised accordingly.

b. Seneca recommends that page 1-1, para 2, of the CRP be revised to state:

"... Note that separate RI/FS's are being conducted for these areas. (INSERT) Other Environmental studies ongoing at SEAD include the investigation of potential source areas that may or may not require remediation. These studies are information gathering efforts and do not constitute evidence of confirmed problems..."

c. Seneca recommends that the following be added to page 2-5 of the CRP:

(INSERT)

2.3.3 Additional Environmental Studies

In 1987 U.S. Army Environmental Health Agency (USAEHA) prepared a groundwater contamination survey entitled "Evaluation of Solid Waste Management Units, Seneca Army Depot", which identified and described SWMU's at SEAD. In addition to the USAEHA Study, the New York State Department of Environmental Conservation (NYSDEC) performed a Resource Conservation and Recovery Act (RCRA) Facility Assessment in August 1988, at SEAD, which identified SWMU's in addition to the units presented in the USAEHA study.

In September 1990, ERC Environmental And Energy Services Co., Inc., began work on a SWMU Classification Report (SCR) for the Huntsville Division, U.S. Army Corps of Engineers (HND). The purpose of this work was to update and revise the previous USAEHA and NYSDEC reports, and collect information necessary to classify the SWMU's as either Areas of Concern (AOC) requiring further investigation or as units requiring no further action. In January 1992, the SCR remained in draft form pending resolution between the Army, NYSDEC and the USEPA regarding the proper classification for several of the SWMU's.

In August of 1991, Chas. T. Main, Inc. (C.T. Main), prepared a draft workplan for the continuing investigation of eleven (11) SWMU's identified by the Draft SCR as the units having the greatest potential for contamination. Pending approval of the workplan by the NYSDEC and the USEPA, it is anticipated that field work for this effort will begin in the spring of 1992.

2. GENERAL COMMENT:

USEPA's Comment:

Public hearings (on the RI/FS and Proposed Plan), preparation of a Responsiveness Summary, and the issuance of public notice announcing the proposed plan and final remediation action plan /ROD are not discussed within the CRP. These activities are required community relations requirements under SARA Sections 113 and 117, NCP Section 300.67, and Superfund Community Relations Policy.

SEAD's Recommendation:

a. The USEPA is indicating that public hearings are required pursuant to SARA §§ 113 and 117. The Army proposes, in the CRP, to conduct public meetings at various technical milestones. However, Seneca feels that formal public hearings are not statutorily required and may not be necessary if the level of public concern regarding the site does not escalate.

Formal Public Hearings are hearings organized by a agency that are open to the public for the purpose of providing an opportunity for comment and testimony on proposed actions, without necessarily answering questions or engaging in dialogue with the audience. All testimony received becomes part of the public record.

Public meetings, on the other hand, are large meetings open to the public in which experts are available to present information and answer questions; citizens may ask questions and offer comments. The purpose of the public meeting is to inform citizens of ongoing response activities, and to discuss and receive citizen feedback on the proposed course of action.

The issue of including formal public hearings in the CRP Public Participation Schedule should be addressed in the forthcoming consultation between USATHAMA, SEAD and the regulators.

b. The National Contingency Plan (NCP) cite, referenced in the USEPA comment, is out-of-date. The NCP § 300.67 does not exist in the revised NCP.

3. GENERAL COMMENT:

USEPA's Comment:

The CRP does not present a single list of federal, state, and local officials (including Army contacts), environmental groups, etc. The SEAD CRP includes the mailing list which includes these individuals as well as local citizens. Media and technical/public affairs contacts are listed in separate appendices. EPA CRP guidance recommends a single appendix which includes the names, addresses, and telephone numbers of all key contacts. The guidance also recommends that private citizens not be included in the CRP contact list.

SEAD's Response:

Seneca recommends that a single contact list be prepared in accordance with the USEPA comment. Names of private citizens should be omitted from the Final CRP.

4. PAGE IV:

USEPA's Comment:

The presentation of a large number of acronyms and abbreviations at the beginning of the document could discourage the nontechnical audience.

SEAD's Response:

SEAD recommends that USATHAMA address this comment as discussed in previous communications between Ms. E. Sergeant, USATHAMA, and Mr. J. Miller, SEAD.

5. PAGE 2-1:

USEPA's Comment:

It is unclear where open burning and controlled detonation of ammunition and explosives occur. The site history section should be tailored to include only that information which is critical to understand why the site is listed on the NPL.

SEAD's Response:

- a. The CRP should be revised in accordance with the following facts:

Open burning/open detonation (OB/OD) operations have been conducted for more than thirty years in the 90 acre munitions destruction area, consisting of a detonation area and the open burning area, which includes nine (9) burning pads. The practice of open burning at the nine pads last occurred in 1987. These burn pads are currently being investigated under the CERCLA RI/FS process. Since 1987, the open burning of Propellants, Explosives and Pyrotechnics (PEP) has been contained within a 40-foot by 8-foot by 2-foot, welded steel tray with concrete supports.

The 90 acre munitions destruction area also includes an open detonation (OD) region. The OD facility consists of an earth mound (glacial material) approximately 500-feet by 200-feet by 20-feet high. The demolition berm has been in use from the late 1950's until present. As a result of SWMU Classification Report (SCR), the OD area which has been designated as SWMU-45, has been classified as an AOC. Further investigation of SWMU-45 is tentatively scheduled for the spring of 1992.

b. Seneca is including, as attachment 3, technical information relevant to the listing of SEAD on the Federal Facilities National Priorities list (NPL). This material was requested by USATHAMA in previous communications between Ms. E. Sergeant, USATHAMA, and Mr. J. Miller, SEAD.

6. PAGE 2-2:

USEPA's Comment:

Section 2.3 Environmental Studies: This section presents a somewhat detailed account of the concerns at the Asn Landfill and Open Burning Grounds. EPA Community relations guidance recommends that the site description section of the CRP be limited to the historical, geographical, and technical details necessary to show why the site was placed the NPL. No discussion on the NPL listing is provided in the CRP.

SEAD's Response:

Seneca is enclosing information relevant to the listing of SEAD on the NPL so that USATHAMA can fully address this issue.

7. PAGE 2-2:

USEPA's Comment:

It is recommended that the detailed information specific to sampling programs and the listing of specific contaminants be eliminated. However, a brief discussion on the potential threat to public health and the environment should be included in this section.

SEAD's Response:

a. SEAD recommends that USATHAMA address the issue of listing specific contaminants and sampling programs as discussed in previous communications.

b. Regarding the request for a brief discussion on the threat to public health and the environment:

Pending key environmental and health risk studies currently being conducted for the site, the potential threat posed to human health and the environment is unknown. The NPL ranking document (enclosed) contains only limited information on target populations and the risk associated with contamination originating from SEAD.

The Agency for Toxic Substances and Disease Registry (ATSDR) will conduct a health assessment at SEAD which will evaluate data and information on the release of hazardous substances at the Ash Landfill and Open Burning Grounds in order to assess any current or future impacts of the site on human health. This health assessment study has not been completed to date.

The RI currently being conducted at the OB Grounds and Ash Landfill includes undertaking detailed human health and ecological risk assessments. Field work for these efforts will resume in the spring months and it is anticipated that a finalized RI report is, at a minimum, several months away.

8. PAGE 2-4:

USEPA's Comment:

"...The public may not comprehend the significance of terminology such as "EP toxicity metals", "total organic carbon/ halogen"...."

SEAD's Recommendation:

SEAD recommends that USATHAMA address this comment as discussed in previous communications between Ms. E. Sergeant, USATHAMA, and Mr. J. Miller, SEAD.

9. PAGE 3-3 to PAGE 3-8:

USEPA's Comment:

Comments regarding reporting of the results of the community interviews (the first two comments on page 3 of the 26 Nov 91 EPA correspondence).

SEAD's Recommendation:

SEAD recommends that USATHAMA address this comment as discussed in previous communications between Ms. E. Sergeant, USATHAMA, and Mr. J. Miller, SEAD.

10. PAGE 5-1:

USEPA's Comment:

Include a discussion in section 5.1 on hearings to be held, the preparation of the responsiveness summary, and public notices.

SEAD's Response:

Seneca suggests revising the plan to include a brief discussion of the responsiveness summary and the public notice. The role played by public hearing's should be discussed during formal consultations with the Army and Regulators.

11. PAGE 5-2:

USEPA's Comment:

The second paragraph refers to the site mailing list. It is recommended that "development and maintenance of the site mailing list" be listed as a separate activity.

SEAD's Response:

The "update of the site mailing list" should be added to the list of tasks in figure 5-1, page 5-7, of the CRP. This task should be listed as ongoing for all project milestones. The protocol for maintaining and updating this list can be explained in forthcoming meetings with the regulatory agencies.

12. PAGE 5-3:

USEPA's Comment:

Item 5 discusses the site information repository. The locations for the repository recommended during the community interview process are listed. The recommendation of community residents that more than one repository be established is also recommended. Yet only one repository was selected (the Town Hall) which was not one of the recommended locations. The rational behind the selection should be included. Residents are likely to be concerned that their recommendations were not utilized.

SEAD's Response:

The issue of the location(s) of information repositories will be addressed in formal consultations with the State and EPA. The CRP, at the recommendation of the EPA, should be revised to show the rational behind Seneca's selection of the Romulus Town Hall as the sole repository. This decision was based in part on the following facts:

The only public library within a close proximity of the site is in Ovid, N.Y. The library's very limited hours make this site unfeasible. The Romulus Town Hall is the logical and best choice for the information repository given factors like the proximity of the Town Hall to the Depot, security provided by the Town Hall, the availability of copying machines for public use, and convenient business hours.

CRP - point of contact..

NOTES -

ART WOLDT - RETIRED; BENJAMIN MARVIN
replaced him.

Attachment number 1

Seneca Army Depots response to the September 10, 1991 NYSDEC correspondence:

NYSDEC Comment Number	Comment Location	Position (A/D)	Comment
1 (all)	Applies to the CRP as a whole	NA	The NYSDEC is requesting a more scientific and exhaustive community interview process and is attacking the validity of the community interviews. The U.S. Army Toxic and Hazardous Materials Agency and/or the Army's CRP contractor, needs to prepare a statement in response to the NYSDEC 's assumptions regarding the validity of the community interviews which constitute the foundation of the CRP.
1 (a)	Community interview results pp. (3-3)-(3-8)	DISAGREE	Eighteen people were interviewed which is consistent with relevant USEPA guidance. The OSWER Directive # 9230.0-15 entitled the <u>Role of Community Interviews in the Development of a Community Relations Program for Remedial Response</u> states that Interviews are typically conducted with 15-25 residents. The guidance points out that only at particularly complex sites are the number of community interviews increased.

NYSDEC Comment Number	Comment Location	Position (A/D)	Comment
1 (b)	Community interviews pp. (3-3) - (3-8)	DISAGREE	<p style="text-align: center;"><u>Regarding the selection process</u></p> <p>The method in which the 18 individuals were chosen for interviews is consistent with applicable USEPA guidance. The Huntsville Division of the Army Corps of Engineers, Public Affairs Office, in conjunction Seneca Army Depots public affairs office, developed an initial interview contact list consistent with OSWER Directive 9230.0-3B pp. (3-3) -(3-4) The names of additional interested parties were obtained from community interview survey question number 11; page 3-7.</p> <p style="text-align: center;"><u>Regarding the comment that a inordinate number of leaders were interviewed</u></p> <p>The interview contact list was developed with the assumption that individuals interviewed should be aware of Seneca Army Depot and be capable of offering feedback regarding environmental concerns at the Depot. Town supervisors, school principals, and village Mayors (i.e. leaders), are capable of giving such responses regarding Seneca Army Depot. The NYSDEC is critical of the study because a majority of the interviews were not specifically aware of environmental concerns (comment 1c). If a majority of non leaders were interviewed, as the DEC recommends in comment 1b, the result would be that a majority of the people interviewed that are aware of environmental concerns would be decreased further.</p> <p style="text-align: center;"><u>Regarding the comment that those interviewed are far removed from the installation</u></p> <p>Nine of the eighteen Seneca County residents interviewed reside and/or work within a two mile radius of the installations boundary. The others interviewed work and/or live within a 10 mile radius of the installation. The NYSDEC needs to keep in mind the large distances that separate hamlets and residences in predominantly agricultural areas.</p>

NYSDEC Comment Number	Comment Location	Position (A/D)	Comment
1 (c)	Community Interviews pp. (3-3) - (3-8)		The fact that of the 18 people interviewed only eight were aware of environmental concerns at the Depot does not make the survey less credible as the NYSDEC comment 1(C) implies. Based on the fact that the community is to a large degree un-aware or uninterested, a proactive schedule for community involvement that will inform the public of environmental concerns while encouraging public involvement has been developed.
2	Page 5.1 and Figure 5-1 p. 5-7	AGREE	<p>◆ Figure 5-1 should be revised to indicate the distribution of fact sheets at the first three milestones and again at the last two milestones .</p> <p>◆ Prior to providing any news releases generated by the Army to local newspapers as scheduled in figure 5-1, page 5-7 of the Plan, Seneca will comply with the reporting requirements as set fourth in the Inter Agency Agreement (IAG) para. 31.3.</p>
3	Section 5.1.6	AGREE	Seneca Army Depot will conduct an Public Meeting as soon as the CRP is approved by the NYSDEC and the USEPA. Since Remedial Investigations at both the Open Burning Grounds and the Ash Landfill operable units are currently underway, it behooves all parties to finalize the community relations plan as soon as possible.
4	Appendix A	AGREE	Appendix A should be revised to include the address's of the Regional editor of the Rochester Times Union, the News Director for WGRC-TV 5 in Rochester N.Y., and the News Director of WHAM-AM radio in Rochester N.Y.
5	Appendix B	Agree	Appendix B should be revised to include the 1991 article in the Rochester Democrat and Chronicle on the Seneca Army Depot environmental investigations.

NYSDEC Comment Number	Comment Location	Position (A/D)	Comment
6	Appendix C	Agree	♦ The New York State Department of Health (NYSDOH) technical and public affairs points of contact that were provided by the NYSDEC, should be included on pages C-2 and C-3. ♦ The telephone number for Mr. Kumal Gupta should be corrected. The correct phone number for Mr. Gupta is (518) 457-3976
7	Appendix D	Agree	The Seneca County Health Department should be included in the appendix D mailing list.

NYSDEC Comment Number	Comment Location	Position (A/D)	Comment
8	Appendix D (pp. D-3 and D-4)	AGREE	<p>The following Seneca County village mayors should be included in the revised CRP. These additions will result in the listing of all the village Mayors in Seneca County. Small hamlets such as Willard, Varick, and Romulus do not have Mayors. The following Mayors should be added:</p> <ul style="list-style-type: none">◆ Mr. Harold Potts Box 56 Lodi NY 14860 (607) 582-6424◆ Mr. William Larson Box 217 Interlaken NY. 14847 (607) 532-8875◆ Mr. Robert G. Freeland Village of Seneca Falls 60 State Street P.O. Box 108, Seneca Falls NY. 13148 (315) 568-8107◆ Mr. Kenneth Patchen 13 West Main Street Waterloo, NY. 13165 (315) 539-3585◆ Mr. Paul O'Connol West Seneca Street Ovid NY 14521 (607) 869- 2975

NYSDEC Comment Number	Comment Location	Position (A/D)	Comment
9	Appendix E	DISAGREE	<p>♦ The only public library within a close proximity of the site is in Ovid, N.Y. The library's very limited hours make this site infeasible. The Romulus Town Hall is the logical best choice for the information repository given factors like the proximity of the Townhall to the Depot, security provided by the Town Hall, the availability of copying machines for the public's use, and convenient business hours.</p> <p>Given the current level of public concern regarding the site, establishing a second off post repository at an alternate location solely for the sake of evening and weekend hours seems inappropriate at this time. If the need for the second repository develops in the future, the issue should be revisited by the Army.</p>

-7-

Attachment 2

Seneca Army Depots response to the United States Environmental Protection Agency (USEPA)
Correspondence dated September 8, 1991

USEPA Comment Number	Comment Location	Position (A/D)	Comment
NA	Page (1-1)	DISAGREE	<p>♦ Seneca Army Depot believes that the reasons for preparing a community relations plan is to document the community's concerns identified during community interviews and to provide a detailed description of the community relations activities selected on the bases of these interviews.</p> <p>The plan adequately documents the community's concerns and the plan also adequately projects activities that are required during the forthcoming Remedial Investigation/ Feasibility Studies. The CRP should be revised to more concisely state the purpose of the plan.</p> <p>♦ The USEPA needs to explain with specific examples, how the current community relations plan is lacking in regards to acquiring a wider depth of knowledge concerning the community. What type of community knowledge is the EPA referring to? Is the EPA referring to community knowledge of environmental problems at Seneca? The results of the community interviews described on pages 3-4 through 3-6 documents community attitudes and concerns regarding environmental problems at the installation.</p> <p>♦ The USEPA needs to provide the Army with specific examples of how the CRP fails to set fourth methods for adequately responding to community concerns. The schedule shown in figure 5-1 on page 5-7 of the plan sets fourth numerous community involvement activity intended to inform the community of ongoing cleanup activities and to provide avenues for active community involvement.</p>

USEPA Comment Number	Comment Location	Position (A/D)	Comment
NA	Page (2-4)	AGREE	Seneca Army Depot agrees that it is not a function of the CRP to speculate on future remedies. Seneca feels that mentioning the O'Brien and Gere phase 2 study in a historical context, however, should not be considered as the speculating future remedies by the Federal government. The Phase II study was mentioned in the context of numerous other studies undertaken at the site and was for historical purposes only. Community Relations Guidance OSWER Directive 9230.0-3B, recommends that the History of inspections and studies conducted at the site be included in the plan.
NA	Page (3-2)	AGREE	<p>♦ The Seneca Army Depot public affairs office did not issue the press release to <u>The Ithaca Journal</u> listed in Appendix B, page B-2. This article was picked up on the Associated Press (AP) wire by the Ithaca Journal. Seneca mentioned in the last quarterly report to the USEPA and the NYSDEC that recent articles discussing Seneca's Clean up have been picked up by the Associated Press. When an article is placed into this service, the information is available to any AP wire subscriber. The Army is not pre notified prior to the running of subsequent articles originating from information derived from the AP data base by subscribing Newspapers.</p> <p>♦ The Ithaca Journal should be included in the available media resources listed on page 3-3, section 3.3, second paragraph. Also, the Ithaca Journals address and phone number should be included in the Appendix A media list.</p>
NA	Page (3-9) through (3-11); figure 3-1	AGREE	The blank questioner repeats information provided on pages 3-4 through 3-7 of the plan. The questioner should therefor be deleted.

