

## **NYSEG**

## **CITIZEN PARTICIPATION PLAN**

Plattsburgh (Saranac Street) Former MGP Site Operable Unit 2 Plattsburgh, New York Site No. 5-10-007

April 2020

Plattsburgh (Saranac Street)
Former MGP Site, Operable Unit 2
Plattsburgh, New York
Site No. 5-10-007

Prepared for:

NYSEG

Prepared by:

Arcadis of New York, Inc.

One Lincoln Center

110 West Fayette Street

Suite 300

Syracuse

New York 13202

Tel 315 446 9120

Fax 315 449 0017

Our Ref.:

30003410 #10

Date:

April 2020

This document is intended only for the use of the individual or entity for which it was prepared and may contain information that is privileged, confidential and exempt from disclosure under applicable law. Any dissemination, distribution or copying of this document is strictly prohibited.

## **CONTENTS**

1	Intro	Introduction		
2	Wha	hat is New York's State Superfund Program?2		
3	Citizen Participation Activities		3	
	3.1	Why NYSDEC Involves the Public and Why It Is Important	3	
	3.2	Project Contacts	3	
	3.3	Locations of Reports and Information	4	
	3.4	Site Contact List	4	
	3.5	CPP Activities	5	
	3.6	Technical Assistance Grant	6	
4	Maj	Major Issues of Public Concern for the Site7		
5	Site Information			
	5.1	Manufactured Gas Plants	8	
	5.2	Location and Site Description	8	
	5.3	Site History and Environmental Activities	8	
6	Inve	Investigation and Cleanup Process		
	6.1	Investigation	. 10	
	6.2	Remedial Design	. 10	
	6.3	Remediation	. 10	
7	Refe	erences	12	

## **TABLE**

Table 1. Citizen Participation Activities and Timing

## **FIGURE**

Figure 1. Site Plan

### 1 INTRODUCTION

This Citizen Participation Plan (CPP) documents the planned project-specific public outreach activities and resources organized for the remedial program associated with Operable Unit No. 2 (OU-2) of the NYSEG Plattsburgh (Saranac Street) Former Manufactured Gas Plant (MGP) Site located in Plattsburgh, New York (Site No. 5-10-007) (the Site). Details related to the remedial activities are presented in the Remedial Design Report (Remedial Design; Arcadis 2019).

This CPP has been prepared in accordance with the New York State Department of Environmental Conservation (NYSDEC) Division of Environmental Remediation (DER) guidance documents DER-23: Citizen Participation Handbook for Remedial Programs (DER-23) (NYSDEC 2010a) and DER-10: Technical Guidance for Site Investigation and Remediation (NYSDEC 2010b). This CPP outlines methods intended to inform interested parties of program developments, elicit responses and public involvement, and provide a central point of contact for inquiries regarding the remedial program for the Site. This CPP presents the planned communication and outreach activities, describes how interested individuals and groups can participate in the remedial program, and provides a variety of reference materials to facilitate gaining access to project-specific information and management personnel.

NYSDEC and NYSEG are committed to the implementation of this CPP as required by applicable NYSDEC guidance in 6 New York Code, Rules, and Regulations (NYCRR) Part 375. As required by 6 NYCRR Part 375-1.10, NYSDEC and NYSEG will review and update this CPP to account for significant changes, if any, in the remedial program outlined in the Remedial Design.

## 2 WHAT IS NEW YORK'S STATE SUPERFUND PROGRAM?

New York's State Superfund Program (SSF) identifies and characterizes suspected inactive hazardous waste disposal sites. Sites that pose a significant threat to public health or the environment, undergo a process of investigation, evaluation, cleanup, and monitoring.

NYSDEC administers the SSF Program with assistance and input from the New York State Department of Health (NYSDOH). When the parties responsible for the contamination of a site are known ("responsible parties"), they often pay for or perform the investigation and evaluation of cleanup options under an enforceable Consent Order. At sites where responsible parties cannot be found or are unable or unwilling to fund an investigation, New York State pays for the investigation and may try to recover costs from responsible parties after the investigation and cleanup are complete.

The SSF program contains investigation and cleanup requirements, ensuring that cleanups protect public health and the environment. For more information about the SSF program, go online at: <a href="http://www.dec.ny.gov/chemical/8439.html">http://www.dec.ny.gov/chemical/8439.html</a>.

#### 3 CITIZEN PARTICIPATION ACTIVITIES

## 3.1 Why NYSDEC Involves the Public and Why It Is Important

NYSDEC involves the public to improve the process of investigation and cleanup of contaminated sites, and to enable citizens to participate more fully in decisions that affect their health, environment, and social well-being. NYSDEC provides opportunities for citizen involvement and encourages early two-way communication with citizens before decision makers adopt final positions.

Involving citizens affected and interested in site investigation and cleanup programs is important for many reasons. These include:

- Promoting the development of timely, effective site investigation and cleanup programs that protect public health and the environment.
- Providing public access to, and understanding of, issues and information related to a particular site
  and that site's remedial process.
- Providing citizens with early and continuing opportunities to participate in NYSDEC's site investigation and cleanup process.
- Ensuring that NYSDEC makes site investigation and cleanup decisions that benefit from input that reflects the interests and perspectives found within the affected community.
- Encouraging dialogue to promote the exchange of information among the affected/interested public, state agencies, and other interested parties that strengthens trust among the parties, increases understanding of site and community issues and concerns, and improves decision making.
- Providing information, through the CPP, about how NYSDEC will inform and involve the public during the investigation and cleanup of the site identified in the CPP.

## 3.2 Project Contacts

william.bennett@dec.ny.gov

New York State project contacts to whom the public should address questions or request information about the Site's investigation and cleanup program is presented below. The public's suggestions about this CP Plan and the CP program for the Site are always welcome. Interested people are encouraged to share their ideas and suggestions with the project contacts at any time.

#### NYSDEC Project Manager (for project-related issues)

William Bennett
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway, 12<sup>th</sup> Floor
Albany, New York 12233-7014
Tel: 518.402.9659

#### NYSDOH Project Manager (for site-related health concerns)

Wendy Kuehner
New York State Department of Health
Division of Environmental Remediation
Empire State Plaza
Corning Tower Room 1787
Albany, New York 12237
Tel: 518.402.7860

wendy.kuehner@health.ny.gov

## 3.3 Locations of Reports and Information

The locations of the reports and information that relate to the Site's investigation and cleanup program are listed below. These locations provide convenient access to important project documents for public review and comment. Some documents may also be placed on the NYSDEC web site. If this occurs, NYSDEC will inform the public in fact sheets distributed about the Site and by other means, as appropriate.

#### **Plattsburgh Public Library**

19 Oak Street

Plattsburgh, New York 12901-2810

Tel: 518.563.0921

http://www.plattsburghlib.org/

PPLInfo@cityofplattsburgh-ny.gov

Hours (as of printing of this document – call to confirm prior to visiting):

Monday, Friday, Saturday 9:00 a.m. to 5:00 p.m.

Tuesday, Wednesday, Thursday 9:00 a.m. to 8:00 p.m.

Additionally, reports, data, and other relevant information developed during the course of the OU-2 remedial program can also be found at the following locations:

#### **NYSDEC Office**

625 Broadway

Albany, New York 12233

Tel: 518.402.9662 (call for an appointment) Hours: Monday-Friday 8:30 a.m. to 4:45 p.m.

**DEC Info Locator** – On-line Repository

https://www.dec.ny.gov/data/DecDocs/510007/

\*Repositories may be temporarily unavailable due to COVID-19 precautions. If you cannot access the online repository, please contact the NYSDEC project manager for assistance.

#### 3.4 Site Contact List

NYSDEC is responsible for developing and maintaining a site contact list to keep the community informed about, and involved in, the site's investigation and cleanup process. The site contact list will be used

periodically to distribute fact sheets that provide updates about the status of the project. These will include notifications of upcoming activities at the Site (such as fieldwork), as well as availability of project documents and announcements about public comment periods.

The site contact list includes, at a minimum:

- Chief executive officer and planning board chairperson of each county, city, town and village in which
  the Site is located.
- Residents, owners, and occupants of the Site and properties adjacent to the Site.
- The public water supplier which services the area in which the Site is located.
- Any person who has requested to be placed on the site contact list.
- The administrator of any school or day care facility located on or near the Site for purposes of posting and/or dissemination of information at the facility.
- Location(s) of reports and information.

The site contact list will be reviewed periodically and updated as appropriate. Individuals and organizations will be added to the site contact list upon request. Such requests should be submitted to the NYSDEC project contact(s) identified in Section 3.2. Other additions to the site contact list may be made at the discretion of the NYSDEC project manager, in consultation with other NYSDEC staff as appropriate.

**Note:** The first site fact sheet (usually related to the Remedial Investigation) is distributed both by paper mailing through the postal service and through DEC Delivers, NYSDEC's email listserv service. The first fact sheet includes instructions for signing up with the appropriate county listserv to receive future notifications about the Site. For more information about DEC Delivers, go online at: <a href="http://www.dec.ny.gov/chemical/61092.html">http://www.dec.ny.gov/chemical/61092.html</a>.

Subsequent fact sheets will be distributed exclusively through DEC Delivers, except for households without internet access that have indicated the need to continue to receive site information in paper form. Please advise the NYSDEC site project manager if your household is without internet access or if you have another need that requires paper mailings.

#### 3.5 CPP Activities

Table 1 identifies the CPP activities, at a minimum, that have been and will be conducted during a site's investigation and cleanup program. The public is informed about these CPP activities through fact sheets and notices distributed at significant points during the program.

- Notices and fact sheets help the interested and affected public to understand contamination issues related to a site, and the nature and progress of efforts to investigate and clean up a site.
- Public forums, comment periods, and contact with project managers provide opportunities for the
  public to contribute information, opinions, and perspectives that have potential to influence decisions
  about a site's investigation and cleanup.

The public is encouraged to contact project staff at any time during a site's investigation and cleanup process with questions, comments, or requests for information.

This CPP may be revised due to changes in major issues of public concern (as identified in Section 4) or in the nature and scope if the investigation and cleanup activities. Modifications may include additions to the site contact list and changes in planned citizen participation activities.

#### 3.6 Technical Assistance Grant

A qualifying community near a site that poses a significant threat to public health or the environment may apply for a Technical Assistance grant (TAG) to receive funds to obtain independent technical assistance. This assistance helps the TAG recipient to interpret and understand existing environmental information about the nature and extent of contamination related to a site and the development/implementation of a remedy.

A qualifying community group must certify that its membership represents the interests of the community affected by the Site, and that its members' health, economic well-being, or enjoyment of the environment may be affected by a release or threatened release of contamination at the Site.

For more information about TAGs, go online at: <a href="http://www.dec.ny.gov/regulations/2590.html">http://www.dec.ny.gov/regulations/2590.html</a>.

#### 4 MAJOR ISSUES OF PUBLIC CONCERN FOR THE SITE

Implementation of cleanup activities at the Site could result in short-term exposure to contamination for the surrounding community during sediment excavation, material handling, and off-site transportation activities. Community access to the work area is limited by the steep banks of the Saranac River within the City of Plattsburgh and support areas would be restricted by temporary security fencing. A site-specific Community Air Monitoring Plan (CAMP), which is included as part of the Remedial Design, will be implemented during remedial construction activities (Arcadis 2019). The CAMP will be used to confirm that dust and volatilized organic vapors are within acceptable levels established by the NYSDEC and NYSDOH, and potential nuisance odors are minimized during remedial activities. Additional engineering controls (e.g., use of water sprays to suppress dust, use of sprays or long-lasting foams to suppress vapors and/or odors, modification of the rate of remedial construction activities, etc.) will be implemented, as necessary during remedial activities, in accordance with the CAMP.

During in-river remedial construction, turbidity monitoring will be conducted both upstream and downstream of the active work area(s). The release of solids (i.e., turbid water) from the removal areas is not anticipated to due to the use of a temporary containment/diversion systems. Prior to installation of the temporary containment/diversion system, appropriate controls (e.g., turbidity curtains) will be installed immediately downstream of the work areas to mitigate solids releases. Additionally, these controls will remain in-place throughout the remedial construction activities to mitigate solid releases.

Off-site transportation of excavated material and importation of fill materials would result in additional local tractor trailer traffic. Transportation activities would be managed to minimize risks to the community.

#### **5 SITE INFORMATION**

This section presents a summary of relevant site background information and environmental activities that have been completed at the Site to date.

#### 5.1 Manufactured Gas Plants

MGPs were operated between the 1800s and mid-1900s, before the development of natural gas systems, to convert coal and oil into gas for heating, lighting, and cooking – much in the same way that natural gas is used today. Manufactured gas-production byproducts, typically dense non-aqueous phase liquid (i.e., coal tar), often account for the majority of the impacts at former MGP sites. Principal components of coal tar routinely analyzed for MGP sites consist of benzene, toluene, ethylbenzene, and xylene compounds, which are volatile organic compounds, and polycyclic aromatic hydrocarbons, which are semi-volatile organic compounds. Inorganic compounds (i.e., metals) are also common contaminants at MGP sites. Visual characterization of media and laboratory analysis of environmental samples for these classes of compounds are useful ways of identifying the nature and extent of environmental media affected by coal tar.

## 5.2 Location and Site Description

The Site is located in the City of Plattsburgh, in Clinton County, New York, and has been divided into the following OUs (Figure 1):

- OU-1 consists of the upland portion of the former MGP area and a portion of the Saranac River immediately adjacent to the upland area.
- OU-2 consists of the Saranac River downstream of Broad Street to the boat launch located on Green Street.
- OU-3 consists of the Saranac River downstream of the boat launch and a portion of Cumberland Bay of Lake Champlain.

The OU-1 portion of the Site is located on Saranac Street and is comprised of parcels currently owned by NYSEG and the City of Plattsburgh. The upland portion of OU-1 has previously been remediated (as discussed below) and will be used to support the OU-2 remedial construction activities.

OU-2 includes river sediments within the Saranac River and is located immediately downstream of OU-1. Note, a small portion of the river and adjacent bank at the downstream-most extent of OU-1 (i.e., Cell 6E) will be remediated as part of OU-2 activities, as stated in the Remedial Design (Arcadis 2019). Investigation activities for OU-3 are currently ongoing.

## 5.3 Site History and Environmental Activities

An electricity generating plant occupied the southwestern portion of the OU-1 in 1891. From approximately 1896 to 1960, the Site housed the MGP. The gas manufacturing process produced large quantities of two different waste materials (coal tar and gas purifier waste), both of which were disposed on-site. When MGP operations ceased around 1960, the Site was used as a NYSEG service center until

1980. The Site has been vacant since 1980, with the exception of temporary support structures constructed during remediation of OU-1.

Various interim remedial measures (IRMs) were conducted at the upland portion of OU-1 from 1987 through 2002. IRM activities included construction/operation of groundwater treatment systems and completion of soil excavation activities to facilitate removal of impacted soils. Remedial action was performed in the river portion of OU-1 in a phased approach from 2010 through 2017. During each phase a portion of the Saranac River was isolated and dewatered. Sediment containing MGP-related impacts was removed and transported off-site for treatment/disposal. Excavation areas were restored with similar/appropriate fill materials. Further details regarding the site history and description, previous remedial investigations and actions in OU-1, and engineering reports are provided in the Final Remedial Action Design (Arcadis 2010) and the subsequent design reports for Phases 2 through 8 (Arcadis 2011, Arcadis 2012, Arcadis 2013, Arcadis 2014, Arcadis 2015, Arcadis 2016, Arcadis 2017).

#### 6 INVESTIGATION AND CLEANUP PROCESS

This section describes the typical steps taken to investigate and, when necessary, remediate a site.

### 6.1 Investigation

Investigation activities are conducted to identify the nature and extent of environmental impacts:

- Site Characterization Initial investigation of the operational history and uses of a site and typically involves collection and laboratory analysis of soil and groundwater samples to evaluate the general nature and extent of site conditions.
- Remedial Investigation (RI) Performed to refine the understanding of a site's hydrogeologic
  conditions, location and depth of subsurface features, and nature and extent of impacts in soil,
  groundwater, soil vapor, etc. Results of the RI serve as the basis for the remedial design phase
  (discussed below).

### 6.2 Remedial Design

Remedial design activities are conducted to develop a plan for the remediation of a site and a plan to monitor and document the effectiveness of the remediation activities:

- Alternatives Analysis or Feasibility Study Conducted to evaluate and compare a variety of remedial alternatives to NYSDEC criteria.
- Proposed Remedy The evaluation of possible remedies ends with a recommended proposal to eliminate the threat posed by contaminants at the site. NYSDEC approves or prepares this proposal, called a Proposed Remedial Action Plan (PRAP). The PRAP describes the remedy preferred by NYSDEC, or a no action or no further action alternative. The PRAP summarizes the decision that led to the recommendation of the preferred remedy by discussing each alternative and the reasons for choosing or rejecting it. The goal of any cleanup plan is to protect public health and the environment. NYSDEC will present the PRAP to the public for its review and comment during a 30-day comment period and at a public meeting.
- Selected Remedy NYSDEC considers public comments as it selects the remedy to address
  contamination related to the site. The selected remedy will be described in a document called a
  Record of Decision (ROD). The ROD will explain why the remedy was selected and respond to public
  comments. This document will be placed in the location of reports and information. If the selected
  remedy is no action or no further action, NYSDEC may then take steps to reclassify the site or
  remove the site from its list of contaminated sites.

#### 6.3 Remediation

Remediation activities typically consist of the following:

Cleanup Action – If the Record of Decision for the site calls for cleanup action, the project then moves
to designing and performing the actions to address the site contamination. When cleanup actions
have been completed, NYSDEC will approve or prepare a Final Engineering Report (FER) that

describes the cleanup actions undertaken and certifies that cleanup requirements have been achieved or will be achieved.

- Certificate of Completion Upon approval of the Final Engineering Report, NYSDEC may issue a
  Certificate of Completion (COC). The COC would recognize the findings of the Final Engineering
  Report and note that the cleanup program achieved a cleanup level consistent with specific
  categories of use for the site. The recipient of the COC would be entitled to limited liability as long as
  it complied with the terms of the COC, and other conditions. A COC may be modified or revoked if, for
  example, the recipient does not comply with the terms of the COC, or if the recipient commits fraud
  regarding its certification that it has met cleanup levels.
- Site Management Site management is the last phase of the site cleanup program. This phase begins when the COC is issued. Site management may be conducted by NYSDEC, or by the responsible party under NYSDEC oversight, if contamination will remain in place. Site management incorporates any institutional controls (ICs) and engineering controls (ECs) required to ensure that the remedy implemented for the site remains protective of public health and the environment. An IC is a non-physical restriction on use of the site, such as a deed restriction that would prevent or restrict certain uses of the property, and may be used when the cleanup action leaves some contamination that makes the site suitable for some, but not all uses. An EC is a physical barrier or method to manage contamination, such as caps, covers, barriers, fences, and treatment of water supplies. Site management also may include the operation and maintenance of a component of the remedy, such as a system that pumps and treats groundwater.

All significant site management activities are detailed in a Site Management Plan. Site management continues until NYSDEC determines that it is no longer needed. During the site management phase, NYSDEC may also take steps to reclassify the site or delist the site from the Registry.

#### 7 REFERENCES

- Arcadis. 2010. Final Remedial Action Design, Plattsburgh (Saranac Street) Former MGP Site In-River Portion of Operable Unit #1, Riverbed and Riverbank Remediation. April.
- Arcadis. 2011. Remedial Action Design Addendum Phase 2, Plattsburgh (Saranac Street) Former MGP Site In-River Portion of Operable Unit #1, Riverbed and Riverbank Remediation. February.
- Arcadis. 2012. Remedial Action Design Addendum Phase 3, Plattsburgh (Saranac Street) Former MGP Site In-River Portion of Operable Unit #1, Riverbed and Riverbank Remediation. April.
- Arcadis. 2013. Remedial Action Design Addendum Phase 4, Plattsburgh (Saranac Street) Former MGP Site In-River Portion of Operable Unit #1, Riverbed and Riverbank Remediation. June.
- Arcadis. 2014. Remedial Action Design Addendum Phases 5 and 6, Plattsburgh (Saranac Street)
  Former MGP Site In-River Portion of Operable Unit #1, Riverbed and Riverbank Remediation.
  February.
- Arcadis. 2015. Remedial Action Design Addendum Phase 6, Plattsburgh (Saranac Street) Former MGP Site In-River Portion of Operable Unit #1, Riverbed and Riverbank Remediation. May.
- Arcadis. 2016. Remedial Action Design Addendum Phase 7, Plattsburgh (Saranac Street) Former MGP Site In-River Portion of Operable Unit #1, Riverbed and Riverbank Remediation. April.
- Arcadis. 2017. Remedial Action Design Addendum Phase 8, Plattsburgh (Saranac Street) Former MGP Site In-River Portion of Operable Unit #1, Riverbed and Riverbank Remediation. May.
- Arcadis. 2019. Remedial Design Report, Plattsburgh (Saranac Street) Former Manufactured Gas Plant Site. September.
- NYSDEC. 2010a. DER-23, Citizen Participation Handbook for Remedial Programs. January.
- NYSDEC, 2010b. DER-10, Technical Guidance for Site Investigation and Remediation. May.

## **TABLE**

Citizen Participation Activities	Timing of Citizen Participation Activity(ies)			
Before Start of Remedial Investigation (RI):				
Prepare site contact list  Establish document repository  Prepare CPP  Place approved RI Work Plan in document repository  Distribute fact sheet to site contact list that announces availability of RI Work Plan and describes upcoming RI field work	Before start of RI. Note: Draft CPP must be submitted to NYSDEC within 20 days of effective date of Consent Order. CPP must be approved by NYSDEC before distribution.			
When NYSDEC Approves RI Report:				
Distribute fact sheet to site contact list that describes RI results     Place approved RI Report in document repository	When NYSDEC approves RI Report.			
When NYSDEC Releases Proposed Remedial Action Plan (PRAP)				
Place PRAP in document repository  Distribute fact sheet to site contact list that describes PRAP and announces 30-day comment period and public meeting  Conduct 30-day public comment period  Hold public meeting about PRAP	When NYSDEC releases PRAP. Comment period begins/ends as per dates identified in fact sheet. Public meeting is held during the comment period.			
When NYSDEC Issues Record of Decision (ROD):				
Place ROD in document repository  Distribute notice to site contact list that announces availability of ROD. ROD includes responsiveness summary of significant comments about PRAP	When NYSDEC issues ROD.			
Before Start of Remedial Action:				
Distribute fact sheet to site contact list that describes upcoming remedial action	Before start of remedial action at a site.			
When NYSDEC Certifies Cleanup Requirements Achieved:				
Distribute fact sheet to site contact list that announces cleanup requirements achieved     If Certificate of Completion (COC) is issued, announce in fact sheet and place copy in document repository	When NYSDEC certifies cleanup requirements achieved, or within 10 days after NYSDEC issues COC or other similar site closure document			
If NYSDEC Reclassifies the Site				
If reclassifying site, may announce in fact sheet announcing achievement of cleanup requirements	At time NYSDEC proposes to reclassify a site.			
If NYSDEC Proposes to Delist the Site from the Registry of Contaminated Sites				
Publish notice in Environmental Notice Bulletin about proposal and 30-day public comment period Distribute notice to site contact list. May announce proposal in fact sheet announcing achievement of cleanup requirements Conduct 30-day public comment period about proposed delist Distribute notice to site contact list when site is delisted	At time NYSDEC proposes to delist a site.			

## **FIGURE**

#### LEGEND:

OU-1 UPLAND AREA
OU-1 RIVER PORTION
OU-2 RIVER PORTION
OU-3 LAKE PORTION

#### NOTES:

 IMAGERY OBTAINED FROM THE EARTH EXPLORER WEBSITE HTTP://EARTHEXPLORER.USGS.GOV, DATED APRIL 28, 2014. IMAGERY OBTAINED WAS IN THE NORTH AMERICAN DATUM OF 1983 (NADB3) NEW YORK STATE PLANES, EAST ZONE, US FOOT AND WAS THEN ALIGNED TO SITE SPECIFIC DATUM.



NYSEG
PLATTSBURGH (SARANAC STREET) FORMER MGP SITE
PLATTSBURGH, NEW YORK
CITIZEN PARTICIPATION PLAN

SITE PLAN





#### Arcadis of New York, Inc.

110 West Fayette St., Suite 300 Syracuse, New York 13202 Tel 315 446 9120 Fax 315 449 0017

www.arcadis.com