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February 6, 2020

Ms. Jess LaClair
New York State Department of Environmental Conservation
Division of Environmental Remediation/Remedial Bureau D
625 Broadway, 12th Floor
Albany, New York 12233-7013

**Subject: Citizen Participation Plan
General Electric Company - Fort Edward, New York
Site No. 5-58-004; Consent Index No. D5-0001-2000-03**

Dear Jess:

Enclosed for your review and approval is the Citizen Participation Plan for the GE Fort Edward Site. This plan was originally submitted in December 2019 and has been revised based on your comments received on January 17, 2020.

Please feel free to contact me at 518-429-4505 if you have any questions or comments.

Sincerely,

Laurie Scheuing
Project Manager

Enclosure

cc: Electronic Copies:
C. Vooris - NYSDOH
A. Park - USEPA
S. Edwards - NYSDEC
J. Zalewski - NYSDEC
M. Murphy - NYSDEC

B. Gibson - GE
E. Merrifield - GE
D. Sommer - Young Sommer
J. Nuss - Arcadis
P. Mazurkiewicz - Ramboll
Z. Evans - AECOM

General Electric Company

CITIZEN PARTICIPATION PLAN

Former Fort Edward, NY Facility
Site No. 5-58-004
381 Broadway
Fort Edward, New York
Washington County, New York

December 2019; Revised February 2020

A large, solid orange geometric shape, resembling a stylized triangle or a section of a larger triangle, is positioned in the bottom right corner of the page. It is composed of two overlapping triangles, creating a complex, angular form that extends from the bottom edge towards the top right corner.

CITIZEN PARTICIPATION PLAN

Former Fort Edward, NY Facility
Site No. 5-58-004
381 Broadway
Fort Edward, New York
Washington, New York

Prepared for:
General Electric Company
25 Allen Street
Hudson Falls, NY 12839

Prepared by:
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Our Ref.:
ALL31333.1000

Date:
December 2019; Revised February 2020

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FIGURES

Figure 1. Site Plan

Figure 2. Site Layout

Note: The information presented in this Citizen Participation Plan was current as of the date of its approval by the New York State Department of Environmental Conservation. Portions of this Citizen Participation Plan may be revised during the Site's investigation and cleanup process

1 INTRODUCTION

This Citizen Participation Plan (CPP) describes the public involvement activities and resources for the remedial program associated with the former General Electric Company (GE) Capacitor Products Division facility located at 381 Broadway, Fort Edward, New York (the Site). The Site is part of New York State's Inactive Hazardous Waste Disposal Site (IHWDS) Program for identifying, investigating, evaluating, cleaning, and monitoring sites that pose a significant threat to public health or the environment. The program is administered by the New York State Department of Environmental Protection (NYSDEC) with assistance and input from the New York State Department of Health (NYSDOH). For more information on remedial programs in New York State, refer to: <https://www.dec.ny.gov/chemical/8439.html>.

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. For the Fort Edward site, GE is the responsible party and the remedial program is being implemented pursuant to the Order on Consent between GE and the New York State Department of Environmental Conservation (NYSDEC), dated October 24, 2001 (Index #D5-0001-2000-03; Site Number 5-58-004), and in accordance with NYSDEC's January 2000 Record of Decision (ROD) (NYSDEC 2000).

Currently, the remedial program for the Site includes the following components:

- Groundwater collection/treatment and non-aqueous phase liquid (NAPL) recovery activities; specific details related to these activities are presented in the March 2008 *"Operations and Maintenance Plan – OU-3 Transition Zone Groundwater and Product Recovery and Collection System"* (O&M Plan; O'Brien & Gere [OBG; now Ramboll] 2008).
- Groundwater and NAPL monitoring activities; specific details related to these activities are presented in the May 2009 *"Sampling and Analysis Plan"* (SAP; OBG 2009).
- Off-Site vapor intrusion mitigation activities; specific details related to these activities in the December 2005 *"Soil Gas Investigation Summary Report"* (OBG 2005).
- Building demolition activities, including material and debris disposition and related activities; specific details related to these activities are presented in the *"Self-Implementing Cleanup and Disposal Plan for PCB Remediation Waste – Building Demolition"* (Demolition Work Plan; Arcadis 2019a).

Ongoing remedial activities are documented by GE in Monthly Progress Reports (MPRs) and Annual Groundwater Monitoring and Remedial Systems Operation Reports (Annual Report) that are submitted to the NYSDEC.

This CPP includes information to inform interested parties of project developments and opportunities for public input and involvement, and provides NYSDEC and NYSDOH points of contact for inquiries regarding the ongoing remedial program for the Site. This CPP presents the project's communication and outreach activities and identifies various reference materials to project-specific information.

NYSDEC and GE 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. NYSDEC and GE will periodically review and update this CPP, as needed, to account for significant changes, if any, in the remedial activities at the Site.

2 CITIZEN PARTICIPATION ACTIVITIES

2.1 Why NYSDEC Involves the Public and Why It Is Important

NYSDEC involves the public during the investigation and cleanup of contaminated sites to enable citizens to participate more fully in decisions that potentially 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 facilitating 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 with 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.

This CCP provides information about how the public can be involved during the ongoing and future remedial activities at the Site.

2.2 Project Contacts

New York State project contacts to whom the public should address questions or request information about the Site's ongoing remedial program are presented below. Public comments and questions about the ongoing remedial 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)

Jessica LaClair

New York State Department of Environmental Conservation

Division of Environmental Remediation

625 Broadway, 12th Floor

Albany, New York 12233-7014

Tel: 518.402.9821

jess.laclair@dec.ny.gov

NYSDOH Project Manager (for project-related health concerns)

Angela Martin
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
BEEI@health.ny.gov

2.3 Locations of Reports and Information

The locations (repositories) of the reports, work plans, and information that relate to the Site's ongoing remedial program are listed below. These locations provide access to key project documents for public review and comment. Some documents may also be placed on the NYSDEC website. If this occurs, NYSDEC will inform the public in fact sheets distributed about the Site and by other means, as appropriate.

Washington County Clerk's Office

Municipal Center
383 Broadway, Building A
Fort Edward, New York 12828
Tel: 518.746.2170 (call for an appointment)
<http://www.co.washington.ny.us/276/County-Clerks-Office>
Hours (as of printing of this document – call to confirm)
Monday through Friday: 8:30 a.m. to 4:30 p.m.

Additionally, reports, data, and other relevant information developed during the course of the Site's ongoing remedial program can also be found at the following location:

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.

2.4 Site Contact List

NYSDEC has developed and maintains a Site contact list to keep the community informed about, and involved in, the Site's remedial program. The Site contact list is used periodically to distribute fact sheets that provide updates about the status of the project, including notifications of upcoming activities and availability of project documents and announcements. The Site contact list includes, at a minimum:

- Local officials of Washington County and the Town of Fort Edward.
- Residents, owners, and occupants of 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.
- Locations 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 contacts identified in Section 2.2.

Note: Fact sheets will be distributed through DEC Delivers, NYSDEC's email listserv service, except for households without internet access that have indicated the need to continue to receive Site information in paper form. People who require paper mailings are asked to contact the NYSDEC Site project manager identified in Section 3.2. For more information about DEC Delivers, including instructions for signing up with the Washington county listserv to receive future notifications about the Site, visit: <http://www.dec.ny.gov/chemical/61092.html>.

2.5 CPP Activities

The public is informed of the general activities that will be performed at the Site through fact sheets and notices distributed at significant points during the remedial program.

- Notices and fact sheets help the public to understand issues related to a site, and the nature and progress of efforts to investigate and clean up a site. If appropriate, GE will assist the NYSDEC in developing (as appropriate) public notices and fact sheets; in addition, GE may also separately develop and communicate information to the public.
- 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 the Site's investigation and cleanup process with questions, comments, or requests for information. In addition, a qualifying community near a site may apply for a Technical Assistance Grant (TAG) to receive funds to obtain independent technical assistance 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. For more information about TAGs, go online at: <http://www.dec.ny.gov/regulations/2590.html>.

This CPP may be revised due to changes in major issues of public concern (Section 4) or in the nature and scope of the ongoing remedial program. Modifications may include additions to the Site contact list and changes in planned citizen participation activities.

3 MITIGATION OF POTENTIAL COMMUNITY IMPACTS

Remedial activities at the Site could potentially result in short-term impacts to the surrounding community, such as routine groundwater/NAPL monitoring, off-Site vapor intrusion mitigation, and building demolition activities. To mitigate these potential impacts, community access to the Site is restricted by security fencing and full-time security staff stationed at the main access gate. In addition, for all remedial activities, protective measures and protocols are established to protect the community during implementation and documented in NYSDEC- and NYSDOH-approved documents; examples of these measures and protocols are presented below:

- *Field Health and Safety Plan* (Field HASP) (OBG 2013) – The Field HASP present the general procedures and requirements to be followed during routine operation and maintenance (O&M) activities (e.g., groundwater/NAPL monitoring) performed to maintain and evaluate the effectiveness of the remedial systems implemented at the Site.
- *Community Air Monitoring Plan* (CAMP) (Arcadis 2019b) – The NYSDEC and NYSDOH approved CAMP presents community air monitoring activities that will be implemented during building demolition activities (e.g., demolition of existing above-grade structures/buildings; sizing, loading, handling of various demolition debris; off-Site transportation and disposal of the debris; and surface restoration activities in areas disturbed by building demolition) to monitor the Site for the presence of project-related airborne constituents, and the response actions that will be taken if threshold concentrations of those constituents are detected above established levels.

In addition to the above, additional project-specific plans are prepared, as necessary, to support other remedial activities. For example, during building demolition activities, off-Site transportation of excavated material and importation of fill materials will result in additional local truck traffic; a traffic control plan has been developed to manage transportation activities and minimize risks to the community.

NYSDEC and NYSDOH have been actively engaged in the development of the documents listed above and will be involved in reviewing and updating the documents, as necessary.

4 SITE INFORMATION

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

4.1 Location and Site Description

The Site is located at 381 Broadway in the Town of Fort Edward, approximately 800 feet east of the Hudson River between the Villages of Hudson Falls (to the north) and Fort Edward (to the south). The Site is approximately 32 acres in size and is bounded by Washington County office building to the north, Upper Broadway/US Route 4 to the east, Park Avenue to the south, and Delaware & Hudson Railroad and Lower Allen Street to the west. Figure 1 shows the location of the Site.

The Site is currently comprised of vegetated areas, paved surfaces, and former manufacturing buildings; including the Main Manufacturing Building (approximately 295,000 square feet [sf]; including Building Nos. 22, 23, 25, 26, 27, 29, 31, and 33), Building 40 (approximately 95,000 sf), Water Treatment Plant (WTP) (West Vaco; approximately 4,500 sf), and several other outbuildings, including a guard house, pump house (Building 24), and a hazardous waste storage building (Building 30). Figure 2 shows the Site layout.

4.2 Site Operational History

The original buildings (Building Nos. 22, 23, guard house, guard shack, pump house) were constructed in 1942 by the U.S. Government as an aircraft turret manufacturing plant. Between 1942 and 1946, GE leased the buildings from the government for the manufacture of Selsyn motors. GE purchased the property in 1946 and began manufacturing small and large capacitors. New buildings and building additions were constructed at the Site through the mid-1970s, with the notable addition of Building 25 in 1959, Building 40 in 1961, and Buildings 26 and 27 in 1967.

Operations related to capacitor production at the Site included aluminum rolling, tin plating, surface coating, vapor degreasing, capacitor recovery and salvage operations, polypropylene film manufacture, refining and blending of dielectric fluids, and quality control operations. Among the products used in various operations were PCBs, organic solvents, and kerosene. PCB use at the facility was discontinued in 1977; use of organic solvents and kerosene-based fluids was discontinued in 1995.

Manufacturing operations were discontinued in the spring of 2016. Closure activities were then initiated by GE with only a few administrative staff remaining on-Site to provide business and building decommissioning support, and a few operations staff to periodically perform quality assurance/quality control (QA/QC) testing of electrical equipment. Limited electrical equipment testing was performed until those operations were transferred to a new facility in late 2017.

4.3 Site Remedial Activities

Several remedial activities have been, are currently being performed, or are planned for the Site under the direction of the NYSDEC, consistent with the January 2000 ROD. These activities include:

- Recovery of NAPL, groundwater, and stormwater throughout the Site as part of long-term operations and O&M activities. Recovered groundwater and stormwater are treated at the WTP prior to discharge

to the Hudson River under current State Pollutant Discharge Elimination System (SPDES) permit number NY-0007048 (NYSDEC 2013). Details related to the O&M activities are provided in the SAP.

- Vapor intrusion mitigation via an engineered Sub-Slab Depressurization System (SSDS) for multiple off-Site structures. Details related to the off-Site vapor intrusion measures are provided in the Soil Gas Investigation Summary Report (OBG 2005).
- Building decommissioning activities such as the removal of asbestos-containing material (ACM), regulated Universal Wastes, and regulated materials.
- Demolition of above-grade structures. In accordance with the Demolition Work Plan, planned building demolition activities generally include the following:
 - Utility disconnections/re-routes that will not require significant subsurface intrusion.
 - Controlled demolition of the Main Manufacturing Building, Building 40, and certain other outbuildings (including non-structural building components such as piping, HVAC systems, outdoor tanks, the electrical high yard and electrical equipment).
 - Sizing, handling, loading, and management of C&D debris for off-Site transportation and disposal, appropriately segregated by waste type (e.g., regulated under the Toxic Substances Control Act [TSCA] and/or the Resource Conservation and Recovery Act [RCRA], ACM) based on previous building material characterization sampling.
 - Downsizing of certain building masonry material for on-Site re-use as backfill.
 - Post-demolition, interim Site restoration, which is anticipated to involve backfill/grading of pits and uneven topography to promote positive drainage and stormwater management and installation of a surface cover over certain building slabs.

Further details pertaining to the planned demolition activities are provided in the Demolition Work Plan.

5 INVESTIGATION AND CLEANUP PROCESS

This section describes the typical steps taken to investigate and, when necessary, remediate a site. Available reports documenting the investigation and cleanup process for the Site are stored in the location of reports and information listed in Section 3.3.

5.1 Remedial Investigation

Remedial investigation activities are conducted to assess the nature and extent of environmental impacts. Investigation activities include:

- 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.

5.2 Remedial Design

Remedial design activities are conducted to develop an overall plan for the remediation of a site and a plan to monitor and document the effectiveness of the remediation activities. Depending on the site, the remedial design can be developed and implemented in one or more integrated components:

- Feasibility Study – Conducted to evaluate and compare a several remedial alternatives to NYSDEC criteria.
- Proposed Remedy – The evaluation of potential remedial alternatives concludes with a recommended remedy to eliminate the threat posed by environmental impacts at a site. NYSDEC approves or prepares this overall 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, including the rationale for recommending the preferred remedy. 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 during the selection of the remedy to address the identified environmental impacts at a site. The selected remedy is described in a ROD. The ROD explains why the remedy was selected and respond to public comments. If the selected remedy is no action or no further action, NYSDEC may then take steps to reclassify a site or remove it from its list of contaminated sites.

5.3 Remediation

Remedial activities typically consist of the following:

- **Cleanup Action** – If the Record of Decision for a site calls for cleanup action, the project then moves to designing and performing the actions to address the identified environmental impacts. When cleanup actions have been completed, NYSDEC approves or prepares 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 a 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 a site remedial 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 a site remains protective of public health and the environment. An IC is a non-physical restriction on use of a 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 a 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.

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 a site or delist it from the Registry.

6 REFERENCES

- Arcadis 2019a. Self-Implementing Cleanup and Disposal Plan for PCB Remediation Waste – Building Demolition. June 2019.
- Arcadis 2019b. Community Air Monitoring Plan – Demolition of Existing Buildings. September 2019.
- NYSDEC, 2000. Record of Decision, GE Fort Edward Plant Site, Town of Fort Edward, Washington County, Ste Number 5-58-004, Operable Units 3 and 4. January 2000.
- NYSDEC, 2010a. DER-23, Citizen Participation Handbook for Remedial Programs. January 2010.
- NYSDEC, 2010b. DER-10, Technical Guidance for Site Investigation and Remediation. May 2010.
- NYSDEC, 2013. State Pollutant Discharge Elimination System (SPDES) Discharge Permit (#NY-0007048). NYSDEC, Division of Environmental Permits, Region 5. Modified August 1, 2013.
- OBG 2005. Soil Gas Investigation Summary Report, General Electric Company, Fort Edward, New York. December 2015.
- OBG 2009. Sampling and Analysis Plan, Fort Edward facility, Fort Edward New York. May 2009.
- OBG 2013. Field Health and Safety Plan, Fort Edward facility, Site Code 5-58-004, Fort Edward New York. July 2013.

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FIGURES



XPERS:
X-CAMP-BORDER-BL
X-BASE-2



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbu

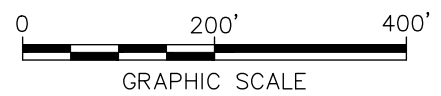


LEGEND:

- APPROXIMATE PROPERTY BOUNDARY
- PARCEL BOUNDARY

NOTES:

- ALL BUILDING LOCATIONS AND SITE FEATURES ARE APPROXIMATE.
- AERIAL PHOTO WAS OBTAINED FROM ESRI ARCGIS ON OCTOBER 4, 2017



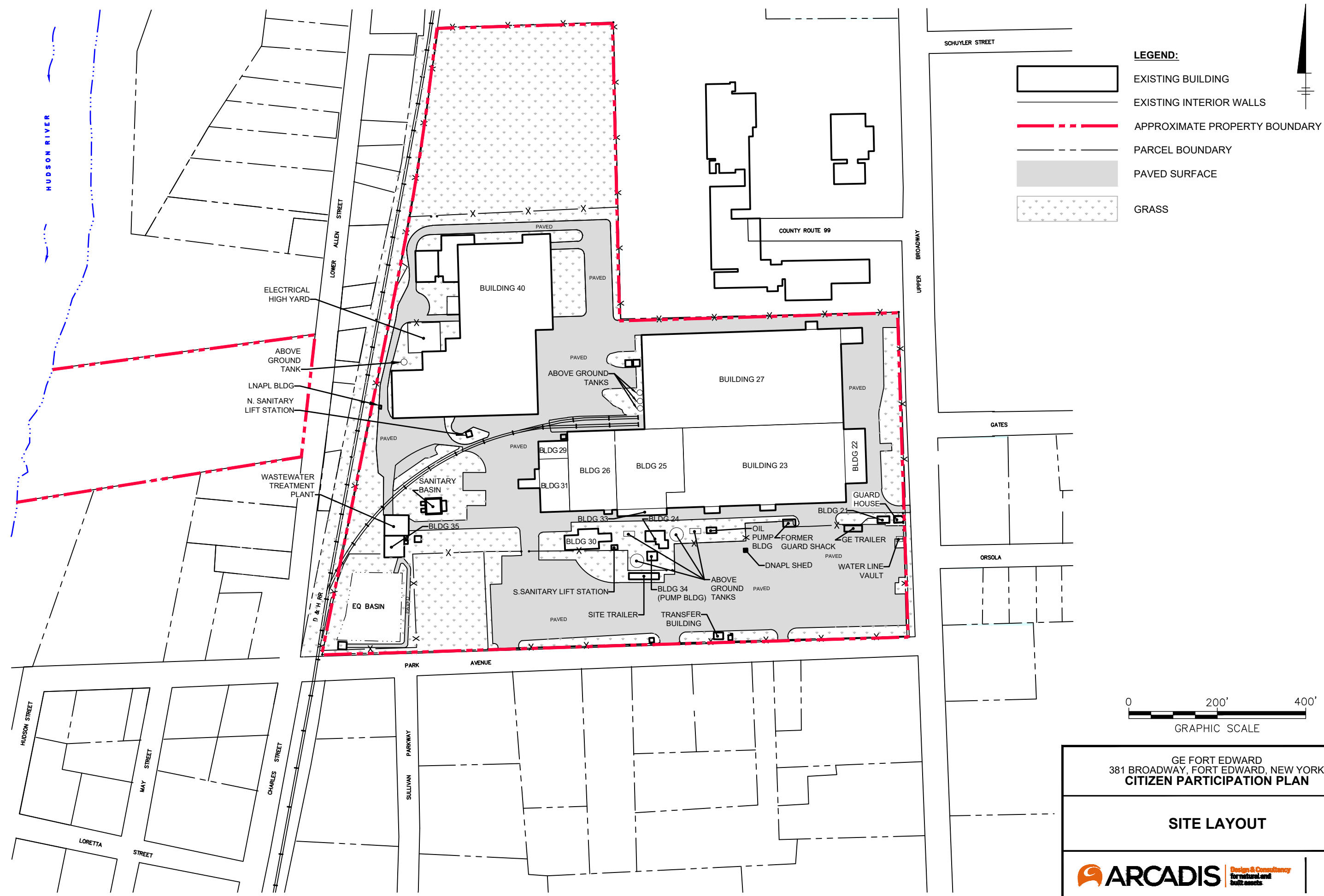
GE FORT EDWARD
381 BROADWAY, FORT EDWARD, NEW YORK
CITIZEN PARTICIPATION PLAN

SITE PLAN

 Design & Consultancy
for natural and
built assets

FIGURE
1

CITY: SYRACUSE, NY DIV/GROUP: EBC-IMD/ DB: L. POSENAUER PM(Regd) TM: K. GAJEWSKI LVR(Opt)ON=OFF=REF*
C:\Users\lposenaue\BIM 360\Arcadis\ANA - GE CORP ENV PROG\Project Files\GE FT EDWARD REMEDIATION\2019\ARC 13207.300001-DWG\GE-FTED_CAMP_FIG 2 AIR MON PLAN.dwg LAYOUT: 2 SAVED: 7/2/2019 4:26 PM ACADVER: 23.05 (LMS TECH) PAGESETUP: C-LB-PDF-TPY
PLOT STYLE TABLE: PLT\FULL.CTB PLOTTED: 7/3/2019 10:14 AM BY: POSENAUER, LISA
XREFS: C:\FTED_DEMOTD_BASE-REV 3.28.19



GE FORT EDWARD
381 BROADWAY, FORT EDWARD, NEW YORK
CITIZEN PARTICIPATION PLAN

SITE LAYOUT


 **ARCADIS** Design & Consultancy
for natural and built assets

FIGURE
2