NEW YORK STATE | Department of Environmental Conservation

State Superfund Program

Citizen Participation Plan
for
Defense Fuel Support Point, Verona, NY

August 2024

Site Number 633086
5449 West Main Street
Town of Verona
Oneida County, New York

Contents

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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.

Site Respondent: **Defense Logistics Agency-Energy (DLA-E)**
Site Name: **Defense Fuel Supply Point (DFSP) Verona**
Site Address: **5449 West Main Street, Verona, NY**
Site County: **Oneida County**
Site Number: **NYSDEC Site Code 633086**

1. 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, such as the site identified above, undergo a process of investigation, evaluation, cleanup, and monitoring.

The New York State Department of Environmental Conservation (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 the 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, the State pays for the investigation and may try to recover costs from the responsible party 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: http://www.dec.ny.gov/chemical/8439.html .

2. Citizen Participation Activities

Why NYSDEC Involves the Public and Why It Is Important

NYSDEC involves the public to improve the process of investigating and cleaning up 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 form or 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.

- Improving 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.

This Citizen Participation (CP) Plan provides information about how DLA-E and NYSDEC will inform and involve the public during the investigation and cleanup of the site identified above. The public information and involvement program will be carried out with assistance, as appropriate, from the responsible party.

Project Contacts

Appendix A identifies project contact(s) to whom the public should address questions or request information about the site's investigation and cleanup program. 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.

Locations of Reports and Information

The locations of the reports and information that relate to the site's investigation and cleanup program also are identified in Appendix A. These locations provide convenient access to important project documents for public review and comment. Some documents may be placed on a website. The public will be informed via public notices (e.g., fact sheets) distributed about the site and by other means, as appropriate.

Site Contact List

Appendix B contains the site contact list. This list has been developed 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 public notices (e.g., 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 Appendix A. Other additions to the site contact list may be made at the discretion of the project team.

Note: The first site fact sheet (related to the Remedial Investigation) will be distributed by paper mailing through the postal service by DLA-E and provided to DEC for distribution through DEC Delivers, its email listserv service. The fact sheet includes instructions for signing up with the appropriate county listserv to receive future notifications about the site, see http://www.dec.ny.gov/chemical/61092.html.

DLA-E will provide subsequent fact sheets about the site to the DEC project contact to be distributed exclusively through the listserv except for households without internet access that have indicated the need to continue to receive site information in paper form. The paper form version will be distributed by DLA-E via the postal service. Please advise the NYSDEC site project manager identified in Appendix A if this is the case. Paper mailings may continue during the investigation and cleanup process for some sites, based on public interest and need.

Citizen Participation Activities

The table at the end of this section identifies the CP activities, at a minimum, that have been and will be conducted during the site's investigation and cleanup program. The flowchart in Appendix D shows how these CP activities integrate with the site investigation and cleanup process. The public is informed about these CP activities through fact sheets and notices distributed at significant points during the program. Elements of the investigation and cleanup process that match up with the CP activities are explained briefly in Section 5.

- **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 the site's investigation and cleanup process with questions, comments, or requests for information.

This CP Plan may be revised due to changes in major issues of public concern identified in Section 3 or in the nature and scope of investigation and cleanup activities. Modifications may include additions to the site contact list and changes in planned citizen participation activities.

Technical Assistance Grant

PFAS (Perfluorooctanoic Sulfonate or Perfluorooctanoic Acid) has been identified at the site. Information regarding the site identified above may qualify community groups for a Technical Assistance Grant (TAG). The purpose of a TAG is to provide funds to the qualifying community group 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 the site and the development/implementation of a remedy.

An eligible 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:
http://www.dec.ny.gov/regulations/2590.html.

Note: The table identifying the citizen participation activities related to the site's investigation and cleanup program follows on the next page:

Citizen Participation Activities	Timing of CP Activity(ies)
Before Start of Remedial Investigation (RI):	
• Prepare site contact list • Establish document repository • Prepare Citizen Participation (CP) Plan • Place approved RI Work Plan in document repository • Distribute public notice/fact sheet to site contact list that announces availability of RI Work Plan and describes upcoming RI field work	Before start of RI. Prepared CP Plan RI Work Plan approved by NYSDEC.
When NYSDEC Approves Remedial Investigation Report:	
• Distribute public notice/fact sheet to site contact list that describes RI results • Place approved RI Report in document repository	When NYSDEC approves RI Report
When DLA-E Releases Proposed Remedial Action Plan (PRAP)	
• Place PRAP in document repository • Distribute public notice/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 DLA-E releases PRAP. Comment period begins/ends as per dates identified in public notice/fact sheet. Public meeting is held during the comment period.
When DLA-E 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 DLA-E issues ROD
Before Start of Remedial Action:	
• Distribute public notice/fact sheet to site contact list that describes upcoming remedial action	Before start of remedial action at the site
When NYSDEC Certifies Cleanup Requirements Achieved:	
• Distribute public notice/fact sheet to site contact list that announces cleanup requirements achieved • If Certificate of Completion (COC) is issued, announce in public notice/fact sheet • If COC is issued, 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 the 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	At time NYSDEC proposes to delist the site

• 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	

3. Major Issues of Public Concern

This section of the CP Plan identifies major issues of public concern that relate to the site. Additional major issues of public concern may be identified during the course of the site's investigation and cleanup process.

From the mid-1980's to 2017, AFFF (Aqueous Film Forming Foam) was stored in drums and tank bladders within the AFFF pump house, located near the northeastern fence line of the facility, for use in the automated fire suppression system. The pump house was connected to dispensing nozzles located at each of the four above grade storage tanks and the truck loading rack by above- and below-grade fire suppression lines. The primary release points of AFFF directly to soil and groundwater include the AFFF pump house and surrounding ground surface, two low point sumps, and the truck loading rack.

Pathways for the PFAS from the primary release points include stormwater and shallow groundwater. Stormwater from release areas potentially carried soil with PFAS with rainwater to ditches and drains offsite to surface water located near the railroad line. Stormwater also spread to the grassy area north of the loading rack to shallow groundwater via rip rap located southwest approximately 400 feet away and downslope from the AFFF pump house. The cumulative effect of PFAS in stormwater from these pathways has contributed to the high concentrations of PFAS in groundwater from wells MW-41 and MW-46.. Groundwater flows northwest and discharges to the same surface water and wetlands located prior to the railroad track.

There are two unnamed tributaries that flow parallel to the railroad track. One tributary flows north approximately 200 feet and crosses the railroad tracks via a culvert and joins the Stony Creek wetland. The second tributary flows south approximately 650 feet and crosses the railroad tracks via a culvert and joins Stony Creek. A third unnamed tributary from the Buckeye Pipeline property joins the southern tributary prior to crossing the railroad tracks. All three unnamed tributaries contribute water to Stony Creek.

4. Site Information

Site Description

- Location - DFSP Verona is located at 5449 West Main Street, Verona, Oneida County, New York

- Setting – DFSP Verona was constructed in 1959 as a fuel storage and transfer facility on previously undeveloped land.
- Site size - The facility consists of 35.16 acres. The site covers approximately 13 acres, which is where site operations occurred and comprise the fenced-in terminal. An additional 22 acres of field to the northeast and northwest is also owned by the Air Force but is not part of the site at this time.
- Adjacent properties – The site is in a rural area with some commercial (laboratory across Main Street) and industrial property (Buckeye Pipeline property to the south).

History of Site Use, Investigation, and Cleanup

DFSP Verona is situated between New York State Route 31 and Interstate 90, and immediately West of State Route 365; one half-mile southwest of the junction of Main Street and Route 31. The facility is approximately 25 miles east of Syracuse, New York.

Historically, there have been four Aboveground Storage Tanks (ASTs) on-site that covered a significant portion of the DFSP Verona service facility (Tanks 1, 2, 3, and 4). Each of the four ASTs, the fuel loading rack, and the fuel pump house were connected to an automated firefighting foam system. DLA-E has identified that aqueous film forming foam (AFFF) was stored and used at the DFSP from the mid-1980s through 2017. Fueling operations ceased at the facility as of September 2014 and DLA-E permanently closed the DFSP in August 2017. AFFF decommissioning activities were documented in the DFSP Verona Aqueous Firefighting Foam System Closure Report, prepared by TK&K Services (November 2017).

Geology & Hydrogeology

The soils at the site are comprised of glacial sediments at DFSP Verona. These soils include silt and clay with a little sand. Bedrock underlying the site is shale, a fine-grained rock that typically cannot easily move groundwater without cracks and joints.

Groundwater

Historically, the direction of groundwater flow in the soil goes to the northwest toward Stony Creek but may vary because of man-made surface features (tank berms, swales, and impervious surfaces) and subsurface utility lines. The Site is located in the Lake Oneida Watershed.

Wetlands

According to the National Wetlands Inventory (NWI) maps reviewed in June, 2023, there are two wetlands located on DFSP Verona along the northwest property line and adjacent to the CSX railroad tracks. The surface water of these wetlands is sometimes connected as one shallow water body, especially during spring runoff and periods of high precipitation.

Surface Water

There are two small wetland areas with surface water located along the western property boundary adjacent to the railroad line. These wetlands have two unnamed tributaries. One of the unnamed tributaries flows from the wetland area south and parallel to the railroad line, passes underneath in a culvert and joins the main branch of Stony Creek; the other tributary flows north approximately 250 feet, passes underneath the railroad line and flows into the Stony Creek wetland. A third unnamed tributary flows northwest from the Buckeye Pipeline property and joins Stony Creek south of the railroad line. All three unnamed tributaries contribute to Stony Creek. Stony Creek flows north/northeast into a large wetland located west of the railroad tracks. Stony Creek meets the description of Class “C” waters by the NYSDEC. The best use of Class “C” waters is fishing, and it is suitable for propagation and primary and secondary contact recreation.

Stormwater drainage from inside the fenced compound of DFSP Verona that is not controlled by the berms around the ASTs is by ditches, drains, and lines to areas outside the fenced compound to the northwest.

Release History

The presence of PFAS in soil and groundwater at the Site is directly related to the storage and use of AFFF. Historically, 55-gallon drums containing AFFF concentrate were used to fill two 200-gallon bladder tanks located in the Fire Foam Pump Building, which were integral to the fire suppression system. In the event of a fire, AFFF would be combined with water in the AFFF pumphouse piping before application to the fire. AFFF concentrate onsite was tested annually and if found to be degraded, it was removed and resupplied by the vendor. As part of the decommissioning of DFSP Verona, all bulk fuel storage vessels and piping have been closed and the facility no longer needs an automated fire suppression system for the fuel system. Site work to remove the AFFF foam product material and residue was performed in August 2017.

There have been two reported historical releases of AFFF at DFSP Verona. Sometime between 1988 and 1993, lightening tripped the photonic eye on Tank 1 and AFFF was released into Tank 1, and subsequently drained into Berm 1. Tank 1 was emptied through fuel separators to remove water and AFFF. Residual dike water and AFFF liquid was recovered by vacuum truck for off-site disposal. Another AFFF release occurred in 2003

onto the concrete truck pad at the loading rack during a lightning event which tripped a sensor. Reportedly, AFFF was not recovered as it evaporated on the pad.

In addition to the noted releases above, periodic testing of the AFFF system by charging lines and draining the system to low point drains or the ground surface surrounding the AFFF pump house was common and may have been a significant source for releasing PFAS to the environment.

5. Investigation and Cleanup Process

Investigation

A Site Characterization Work Plan for the investigation of PFAS was submitted to the NYSDEC and approved on December 3, 2018. Fourteen of sixteen soil samples contained PFAS with the highest concentrations in soil sample SSPFAS-33 (0-2 ft.) and surface sample SSPFAS-38 (0-6 in.). These samples contained PFOS (Perfluoro-octane Sulfonate) above the United States Environmental Protection Agency (USEPA) Regional Screening Level (RSL) at 185 and 184 ug/kg, respectively. Groundwater sampling performed in January 2019 confirmed the highest concentration of combined perflourooctanoic acid (PFOA) and PFOS was detected in monitoring well MW-33, which is in an area that floor drain effluent from the AFFF Pump House. The elevated levels of PFAS in groundwater (5,560 ng/l PFOS and 425 ng/l PFOA) have been related to the PFAS releases in soil near the AFFF pump house where there may be a continuing source of PFAS contamination.

In October and November 2020, an Interim Remedial Measure (IRM) was performed by DLA-E to reduce soil with PFAS concentrations above the calculated USEPA RSL of 126 ug/kg for residential exposure in the area north of the AFFF pump house. Impacted soil may have been a source of contamination to groundwater. Approximately 1,213 tons of PFAS impacted soil was excavated and properly disposed off-site. IRM activities were documented in the Final Interim Remedial Measure Report by TK&K Services (October 2022) that has been submitted to the NYSDEC.

During the semi-annual groundwater monitoring event in April 2021, a total of 27 groundwater samples were collected from monitoring wells for analysis of PFAS compounds using USEPA Method 537M. The results of this sampling event were included in the Post Mitigation Performance Sampling Report, (September 2021) which has been provided to NYSDEC.

From October 27 through October 29, 2021, TK&K sampled 27 monitoring wells. Results were similar to previous monitoring events and were provided in the Final Post Mitigation Performance Sampling Report (February 2023).

The latest post mitigation sampling event was performed in May 2023 and the results are currently under review by TK&K. The May 2023 analytical results are similar to previous sampling events.

Further investigations, evaluation and cleanup (if necessary) of this site will occur under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process in accordance with the Department of Defense Remediation Plan for Cleanup of Water Impacted with PFAS, submitted to Congress in June 2020.

The Air Force owns DFSP Verona, and DLA-E is responsible for environmental closure of the Site. DLA-E will continue to coordinate actions at the Site with NYSDEC and the NYSDOH.

A detailed study of the site will be performed with oversight by NYSDEC and NYSDOH. This detailed Remedial Investigation (RI) study, and the RI work plan is available for public review at the "Locations of Reports and Information" identified in Appendix A.

The site investigation has several goals:

1. Define the nature and extent of contamination in soil, surface water, groundwater and any other parts of the environment that may be affected;
2. Identify the source(s) of the contamination;
3. Assess the impact of the contamination on public health and the environment; and
4. Provide information to support the development of a proposed remedy to address the contamination.

NYSDOH reviews and recommends activities that will be performed during the investigation to ensure that a complete picture of potential health impacts is understood. Such activities include identifying, such as through direct contact.

The information collected during the site investigation will be summarized in a Remedial Investigation Report.

Feasibility Study

After the site investigation has begun, and after the PFAS CERCLA Applicable or Relevant and Appropriate Requirements (ARARs) have been established DLA will coordinate with NYSDEC to conduct a Feasibility Study (FS). The FS uses information developed to develop and evaluate potential ways to remediate contamination related to the site. It is also possible that information used to support the FS supports the conclusion that is needed to address site-related contamination.

Proposed Remedy

DLA-E will prepare this proposal, called a Proposed Remedial Action Plan (PRAP) that is reviewed by NYSDEC. The PRAP describes the remedy preferred by DLA-E, or a no action or no further action alternative. The PRAP summarizes the recommendation of a preferred remedy. DLA-E 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

DLA-E considers public comments as it reviews DLA-E documents detailing the selected remedy to address contamination related to the site. These documents will be placed in locations shown in Appendix A. If the selected remedy is no action or no further action, DLA may request to reclassify the site or remove the site from NYSDEC's list of contaminated sites.

Cleanup Action

NYSDEC will approve a Final Engineering Report 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 remains in place. Site management incorporates any institutional and engineering controls required to ensure that the remedy implemented for the site remains protective of public health and the environment. All significant activities are detailed in a Site Management Plan.

An *institutional control* is a non-physical restriction on use of the sites. An institutional control may be used when the cleanup action leaves some contamination that makes the site suitable for some, but not all uses.

An *engineering control* is a physical barrier or method to manage contamination. Such as caps or 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. 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 of Contaminated Sites.

Appendix A --
Project Contacts and Locations of Reports and Information

Project Contacts

For information about the site's investigation and cleanup program, the public may contact any of the following project staff:

New York State Department of Environmental Conservation (NYSDEC):

Project Manager
NYSDEC Jolene Lozewski
Jolene.Lozewski@dec.ny.gov
Division of Environmental Remediation
625 Broadway, 12th Floor
Albany NY, 12203-7015
(518) 402-8805

Public Information Officer
NYSDEC Nance Arquiett
Information.R6@dec.ny.gov
Region 6 Headquarters:
317 Washington St., Watertown, NY
13601-3787
(315) 785-2239

New York State Department of Health (NYSDOH):
Project Manager
NYSDOH Sally Rushford
Sally.rushford@health.ny.gov
Bureau of Environmental Exposure
Investigation
Corning Tower, Empire State Plaza,
Room 1787
Albany, NY 12237
(518) 402-5465

Defense Logistics Agency-Energy (DLA-E)
Point of Contact
Anthony Sandoval
Anthony.Sandoval@dla.mil
Defense Logistics Agency – Energy
8725 John J. Kingman Road
Room 2828
Fort Belvoir, VA 22060
571.596.0769

Locations of Reports and Information

The facility identified below will be used to provide the public with convenient access to important project documents. It is anticipated that the repository for reports and site information will be located:

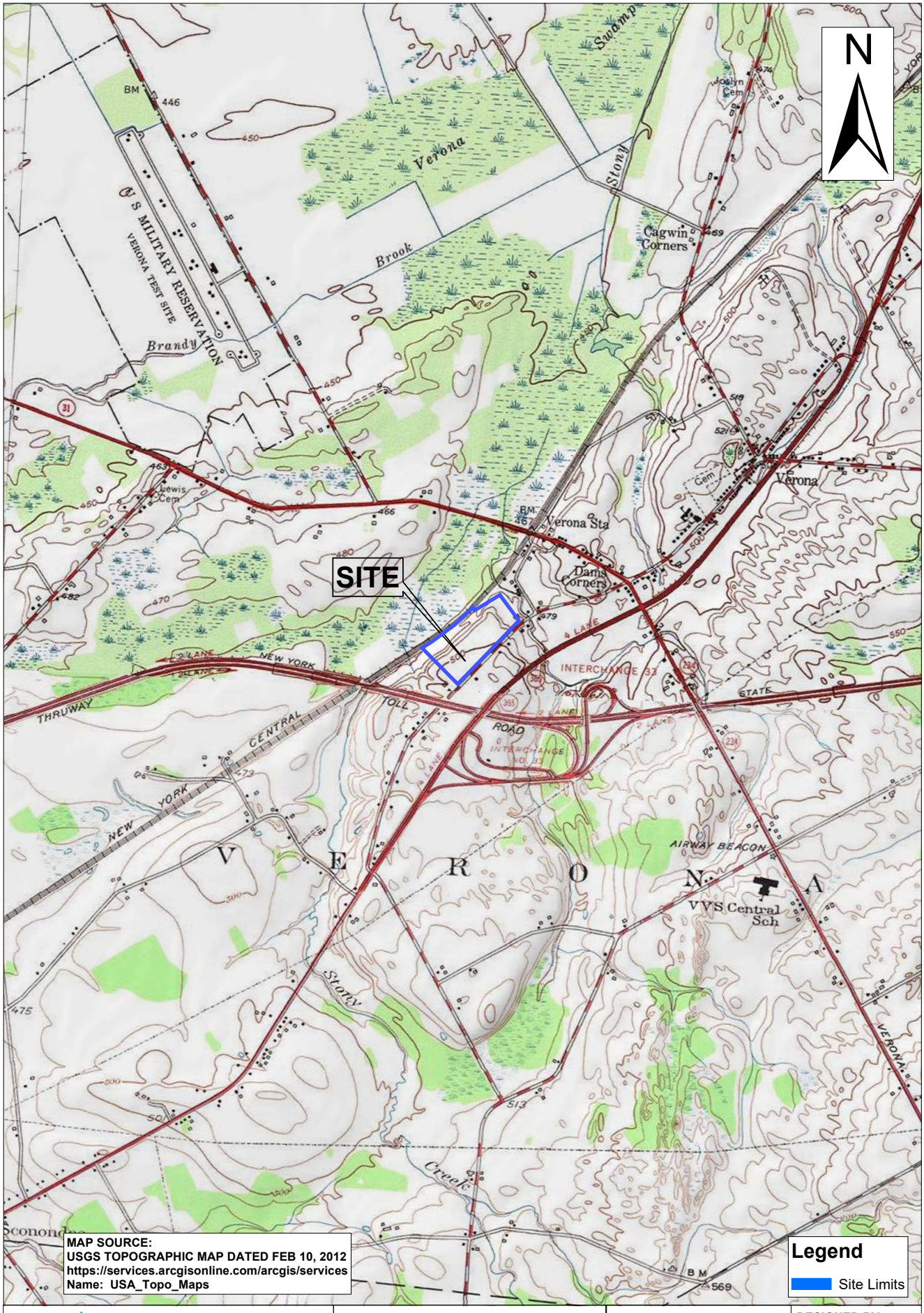
Oneida Public Library
549 Main Street
Oneida, NY 13421

Appendix B -- Site Contact List

Name	Title	Telephone	Email
Anthony J. Picente	County Executive	315-798-5800	ce@ocgov.net
Nicolas A. DeRosa	Director of Health	315-798-6400	publichealth@ocgov.net
Karl E. Shrantz, PE	Commissioner, Dept. of Water Quality and Water Pollution Control	315-798-5656	wpc@ocgov.net
Scott Musacchio	Town of Verona Supervisor	315-363-6799	supervisor@townverona.org

Note: Please note that the names, addresses, and email addresses of adjacent property owners and residents on the contact list should not be placed in versions of this document available to the public. Instead, they should be maintained confidentially in DLA-E and NYSDEC files.

Appendix C -- Site Location Map



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719 HALE STREET
BEVERLY, MA 01915
978-653-4138
www.tkandk.com

DEFENSE LOGISTICS AGENCY
SUPPORT FOR ENERGY
VERONA, NY

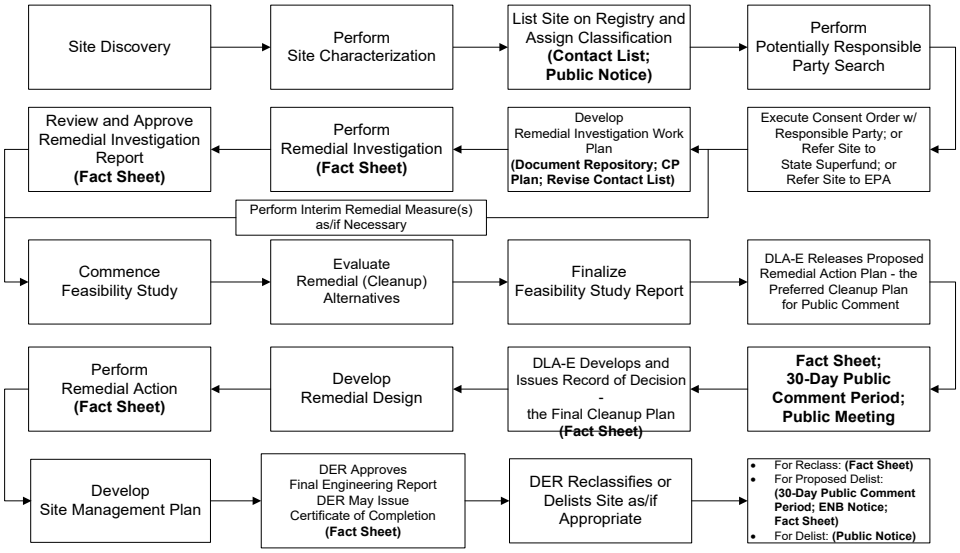
FIGURE 1
SITE LOCUS MAP

POST MITIGATION
PERFORMANCE
SAMPLING REPORT

DESIGNED BY: SC
CHECKED BY: EK
APPROVED BY: EK
DRAWN BY: SC
SCALE: AS SHOWN
DATE: 6/14/2021

PROJECT No.: 14003

Appendix D - State Superfund Program Remedial Process



Note: CP Activities are in **Bold**.

NEW YORK STATE OF OPPORTUNITY. Department of Environmental Conservation

Division of Environmental Remediation