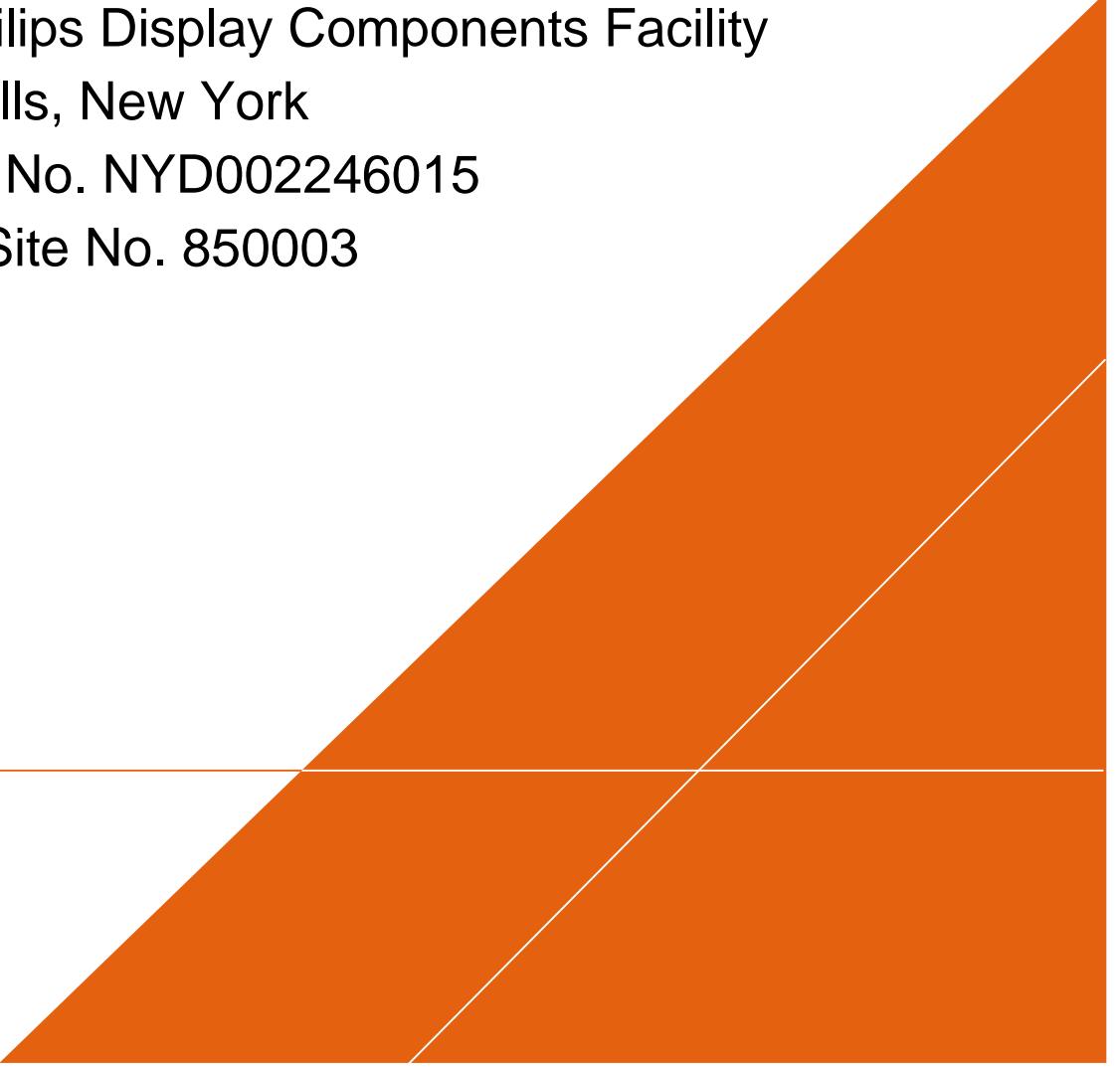


GTE Operations Support Incorporated

CITIZEN PARTICIPATION PLAN

Former Philips Display Components Facility
Seneca Falls, New York
USEPA ID No. NYD002246015
NYSDEC Site No. 850003

February 2020



CITIZEN PARTICIPATION PLAN

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Former Philips Display Components
Facility
Seneca Falls, New York

Prepared for:
GTE Operations Support Incorporated

Prepared by:
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Our Ref.:
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Date:
February 13, 2020

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1 INTRODUCTION

This citizen participation plan addresses involvement with the public related to the investigation and cleanup of the Former Philips Display Components Facility in Seneca Falls, New York (the “Site”). Sites subject to Corrective Action requirements under the Resource Conservation and Recovery Act (RCRA) (also known as the “Industrial Hazardous Waste Management Program”), such as the Site, are evaluated to identify, develop, and implement an appropriate corrective measure or measures to protect human health and the environment.

The New York State Department of Environmental Conservation (NYSDEC) administers the RCRA program in New York State. The parties responsible for the contamination of a site (“responsible parties”), often pay for or perform the investigation and evaluation of cleanup options under an enforceable consent order. Alternatively, as is the case for the Site, a separate party (a “respondent”) may be obligated by an enforceable consent order to pay for the performance of the required investigation and the development and implementation of actions required by the Corrective Action requirements of RCRA. Additional details about New York’s Hazardous Waste Management Program can be found online at:
<https://www.dec.ny.gov/chemical/8486.html>.

2 CITIZEN PARTICIPATION ACTIVITIES

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 NYSDEC will inform and involve the public during the investigation and cleanup of the Site identified above.

2.1 Project Contacts

Project contact(s) to whom the public should address questions or request information about the Site's investigation and cleanup program are listed here and in Appendix A. 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.

Project Related Questions

Danielle Miles, Project Manager
New York State Department of Environmental Conservation
6274 East Avon-Lima Rd, Avon, NY 14414
Phone: (585) 226-5349
Email: danielle.miles@dec.ny.gov

Health Related Questions

Eamonn O'Neil
New York State Department of Health
Corning Tower 1787
Albany, New York 12237
Phone: (518) 402-7950
Email: Eamonn.ONeil@health.ny.gov

2.2 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 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.

2.3 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 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

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the NYSDEC project contact(s) identified in Appendix A. 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.

Fact sheets are distributed through DEC Delivers, its email listserv service. See <http://www.dec.ny.gov/chemical/61092.html> for instructions for signing up with the appropriate county listserv to receive future notifications about the Site. Fact sheets about the Site will be distributed exclusively through the listserv except for households without internet access that have indicated the need to receive Site information in paper form. 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.

2.3.1 Citizen Participation Activities

Table 1 at the end of this section identifies the remaining CP activities, at a minimum, that remain to be conducted during the Site's investigation and cleanup program. The public is informed about 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. A webpage dedicated to this Site may be located online by entering the Site code (850003) into the database search at:

<https://www.dec.ny.gov/cfmx/extapps/derexternal/index.cfm?pageid=3>

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 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.

Table 1. Citizen Participation Activities

Citizen Participation Activity	Timing of Activity
	Before Start of Remedial Action
• Distribute fact sheet to Site contact list that describes upcoming remedial action	Before start of remedial action at the Site

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Citizen Participation Activity	Timing of Activity
When NYSDEC Certifies Cleanup Requirements Achieved	
<ul style="list-style-type: none"> Distribute fact sheet to Site contact list that announces cleanup requirements achieved If Certificate of Completion is issued, announce in fact sheet If Certificate of Completion is issued, place copy in document repository 	When NYSDEC certifies cleanup requirements achieved, or within 10 days after NYSDEC issues Certificate of Completion or other similar Site closure document
If NYSDEC Reclassifies the Site	
<ul style="list-style-type: none"> If reclassifying Site, DEC may announce in fact sheet announcing achievement of cleanup requirements 	At time NYSDEC proposes to reclassify the Site
If NYSDEC Proposes to List or Delist the Site from the Registry of Contaminated Sites	
<ul style="list-style-type: none"> 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 list or delist the Site

3 MAJOR ISSUES OF PUBLIC CONCERN

Previous investigations have identified groundwater, sediment, soil vapor, and soil contamination at the Site.

Based upon investigations conducted to date, the primary constituents of concern (COC) for this Site include trichloroethene (TCE – a chlorinated solvent historically used for industrial purposes such as degreasing machinery); TCE breakdown products, *cis* 1,2-dichloroethene and vinyl chloride; and cadmium. Soils contain TCE within portions of the Site. In groundwater, concentrations of TCE and its breakdown products, collectively termed volatile organic compounds (VOCs), exceed NYSDEC Class GA drinking water standards (typically 5 parts per billion). People are not drinking groundwater from the Site because the area is served by a public water supply that is not affected by Site COCs. VOC concentrations in soil vapor and indoor air exceeded concentrations that trigger a recommendation for mitigation in some buildings on Site; actions have been taken to address those impacts. Cadmium concentrations in some soil samples exceed the applicable clean-up objectives (typically 9.3 parts per million). Cadmium is present in sediments in the Cayuga-Seneca Canal; however, they are covered by approximately six inches of more recent sediment with lower cadmium concentrations, and there is no exposure route to wildlife.

4 SITE INFORMATION

Appendix C contains a map identifying the location of the Site. The Site is at 50 Johnston Street in the Town of Seneca Falls, Seneca County, New York (Figure 1). The approximately 64-acre Site includes an approximately 13-acre complex of interconnected buildings constructed between 1914 and the 1970s that are located between a suburban neighborhood and the Seneca-Cayuga Canal. The Site property is zoned for industrial use.

Prior to 1914 the Site was undeveloped. From 1914 through the 1930s water pumps were manufactured on Site. From the 1940s through the early 1950s black-and-white television components were manufactured on Site. Manufacturing was converted to color-television components in the early 1950s. A wastewater treatment plant was constructed in the early 1970s. Manufacturing operations ceased in 1986. With the cessation of manufacturing, the wastewater treatment plant was decommissioned. Roof drainage and storm water were directed to the Cayuga-Seneca Canal through an outfall. In 1989, the Seneca County Industrial Development Agency acquired the Site. From 1989 to the present, the building complex was leased from the Seneca County Industrial Development Agency for warehousing by H.P. Neun Company, Inc., later Viva Foam Products, Inc. (H.P. Neun), and now Seneca Falls Specialties & Logistics Company.

5 INVESTIGATION AND CLEANUP PROCESS

The following sections summarize historical Site investigation and interim remediation activities, and the selected remedy for the Site.

5.1 Investigation

Remedial and investigative actions are completed, underway, or planned at the Site. In 1984, a Resource Conservation and Recovery Act (RCRA) Part B Permit application was submitted regarding wastewater treatment plant activities. After receiving interim status under RCRA, the permit application was withdrawn when a decision was made to cease manufacturing. Withdrawing the permit application did not release the Site from RCRA interim status; therefore, the wastewater treatment plant decommissioning (e.g., treatment plant, process tanks, settling lagoons) proceeded as RCRA closure activities and various RCRA investigations and corrective actions have occurred since the mid-1980s. A RCRA Facility Assessment was completed in 1994. Various areas of the Site were subsequently investigated, and the nature and extent of COCs were evaluated in multiple phases. These additional investigations were summarized in multiple documents, including a RCRA Facility Investigation Report prepared in 2002 and a Corrective Measures Study Report prepared in 2013. Areas subject to further evaluation have been grouped into the following Areas of Concern (AOCs):

- Building 2 area – VOCs in soil and groundwater to the south of Building 2 and Building 5.
- Building 7 area – VOCs in soil and groundwater south of Buildings 7 and 9.
- Building 11 area – VOCs in soil and groundwater south of Building 11A.
- Soil Vapor Intrusion Pathways – VOCs in sub-slab vapor beneath Buildings 1, 2, 3, 4, 6, 7, 8, 9, 10, 10A, 11A, 13, and 13A.

- Historical Outfalls – Metals, primarily cadmium, in historical outfall ditch soils both on- and off-Site between the Site and the canal.

5.2 Selected Remedy

Various corrective measures were evaluated for the above AOCs in the Corrective Measures Study Report prepared in 2013 and the Corrective Measures Study Report Addendum prepared in 2016. The remedy selected is outlined in the Statement of Basis dated March 2018 and issued by the NYSDEC. The selected remedy substantially consists of:

- Excavation and disposal of soil above the water table containing TCE or cadmium above the respective cleanup levels.
- Monitored attenuation of VOCs in groundwater.
- Thermal treatment of TCE in certain areas of the Site.
- Soil vapor intrusion mitigation has been addressed by interim corrective measures.
- Institutional controls in the form of an environmental easement, a Site management plan, and an Operations and Maintenance Plan to protect public health and the environment. An institutional control may be used when the cleanup action leaves some contamination that makes a site suitable for some, but not all uses.

5.3 Cleanup Action

The respondent will submit a Remedial Design to the NYSDEC that outlines how the selected remedy is proposed to be implemented. Following approval of this plan and when cleanup actions have been completed, NYSDEC will approve a Final Engineering Report submitted by the respondent that describes the cleanup actions undertaken and certifies that cleanup requirements have been achieved or will be achieved.

5.4 Certificate of Completion

Upon approval of the Final Engineering Report, NYSDEC may issue a Certificate of Completion. The Certificate of Completion 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 Certificate of Completion would be entitled to limited liability as long as it complied with the terms of the certificate, and other conditions. A Certificate of Completion may be modified or revoked if, for example, the recipient does not comply with the terms of the certificate, or if the recipient commits fraud regarding its certification that it has met cleanup levels.

5.5 Site Management

Site management is the last phase of the Site cleanup program. This phase begins when the Certificate of Completion is issued. Site management will be conducted by the respondent. Site management incorporates 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 and an Operations and Maintenance Plan.

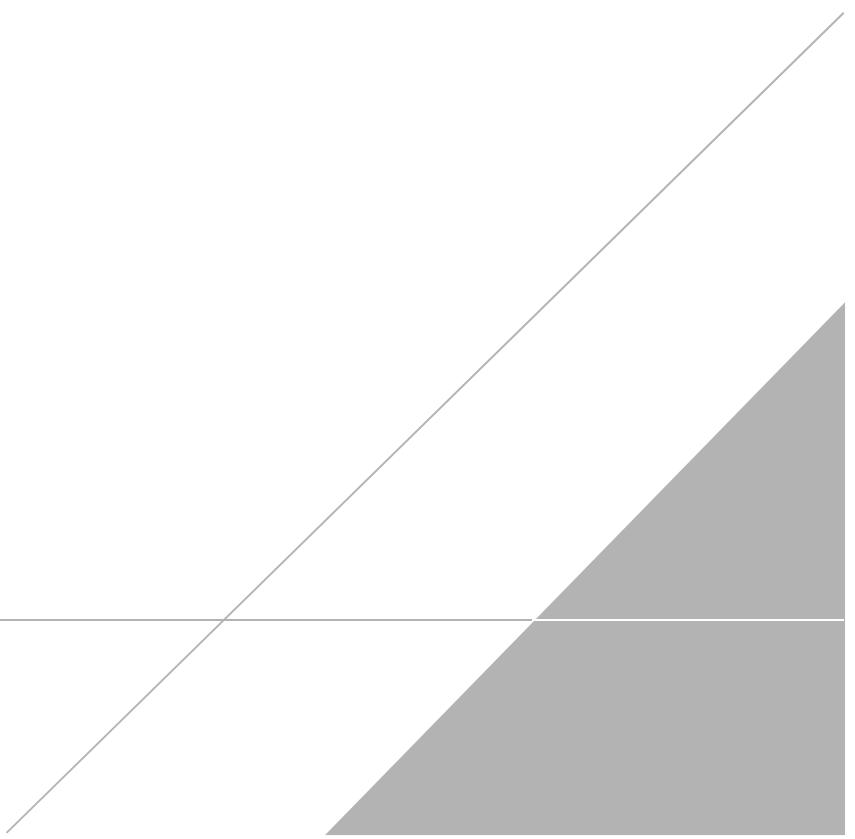
CITIZEN PARTICIPATION PLAN

An engineering control is a physical barrier or method to manage contamination. Examples include: caps, covers, barriers, fences, and treatment of water supplies.

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 list or delist the Site from the Registry of Contaminated Sites (the Site is not currently listed on this registry).

APPENDIX A

Document Repository



APPENDIX A

LOCATION FOR DOCUMENT REPOSITORY

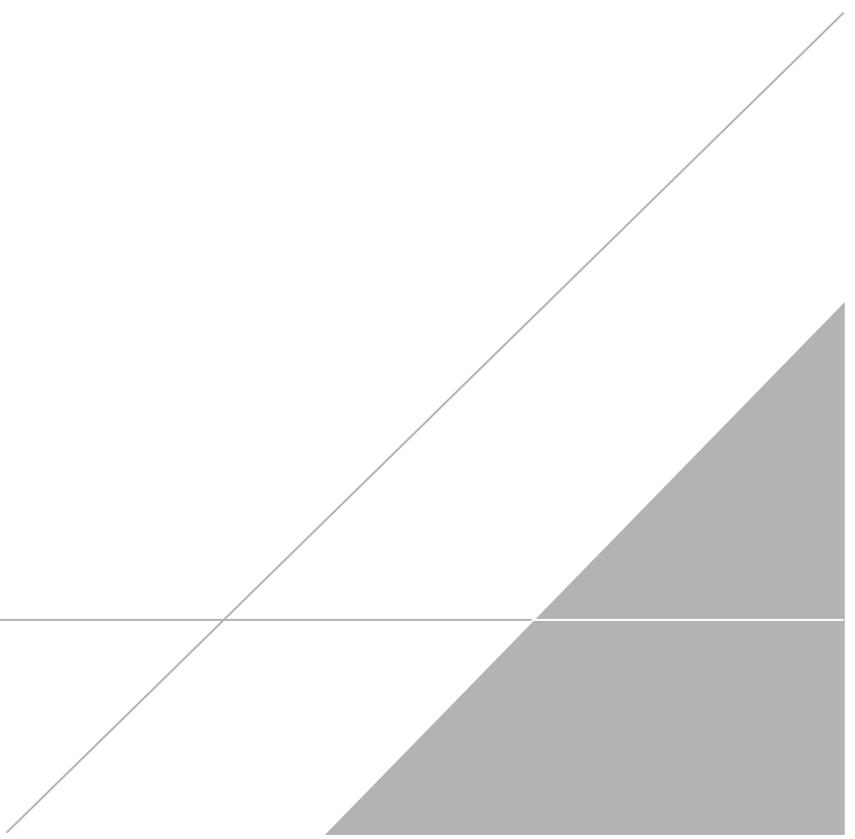
- Seneca Falls Library
47 Cayuga Street
Seneca Falls, NY 13148
Phone: (315) 568-8265
Hours of Operation:

HOURS	
Sunday	2 pm – 5 pm (Closed June thru August)
Monday-Friday	10 am – 8 pm
Saturday	10 am – 5 pm

- New York State Department of Environmental Conservation
Remedial Bureau E, Section C
625 Broadway, 12th Floor
Albany, New York 12233
Phone: (518) 402-9813
Hours of Operation: Monday-Friday 8:30 am - 4:45 pm

APPENDIX B

Site Contacts



APPENDIX B

CONTACT LIST

SITE PROPERTY OWNER

Seneca Falls Specialties Company, Inc.
50 Johnston St.
Seneca Falls, NY 13148

ADJACENT PROPERTY OWNERS

The adjacent/affected property owners portion of the list is maintained confidentially in project files, not in this CPP or repository

MUNICIPAL OFFICIALS – TOWN OF SENECA FALLS

Gregory P. Lazzaro, Town Supervisor
Town Hall
130 Ovid St.
Seneca Falls, NY

Joseph Tullo, Chief Water Treatment Plant Operator
Water & Sewer Department
130 Ovid Street
Seneca Falls, NY 13148

Jeffrey Wilkes, Town Planning Board Chair
2498 Lower Lake Road
Seneca Falls, NY 13148

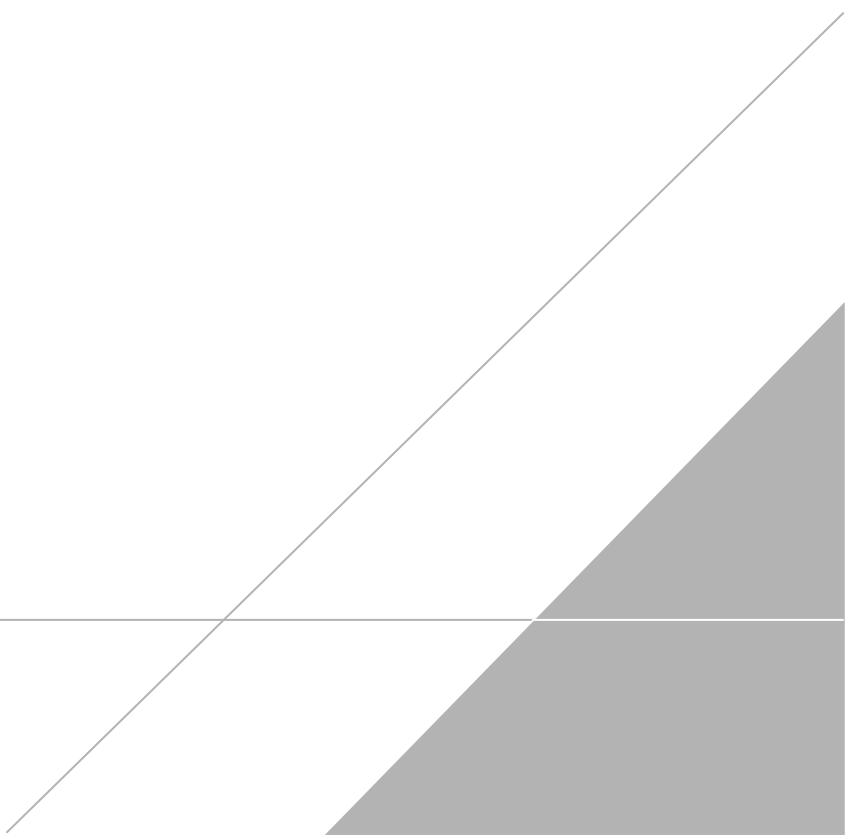
COUNTY OFFICIALS – SENECA COUNTY

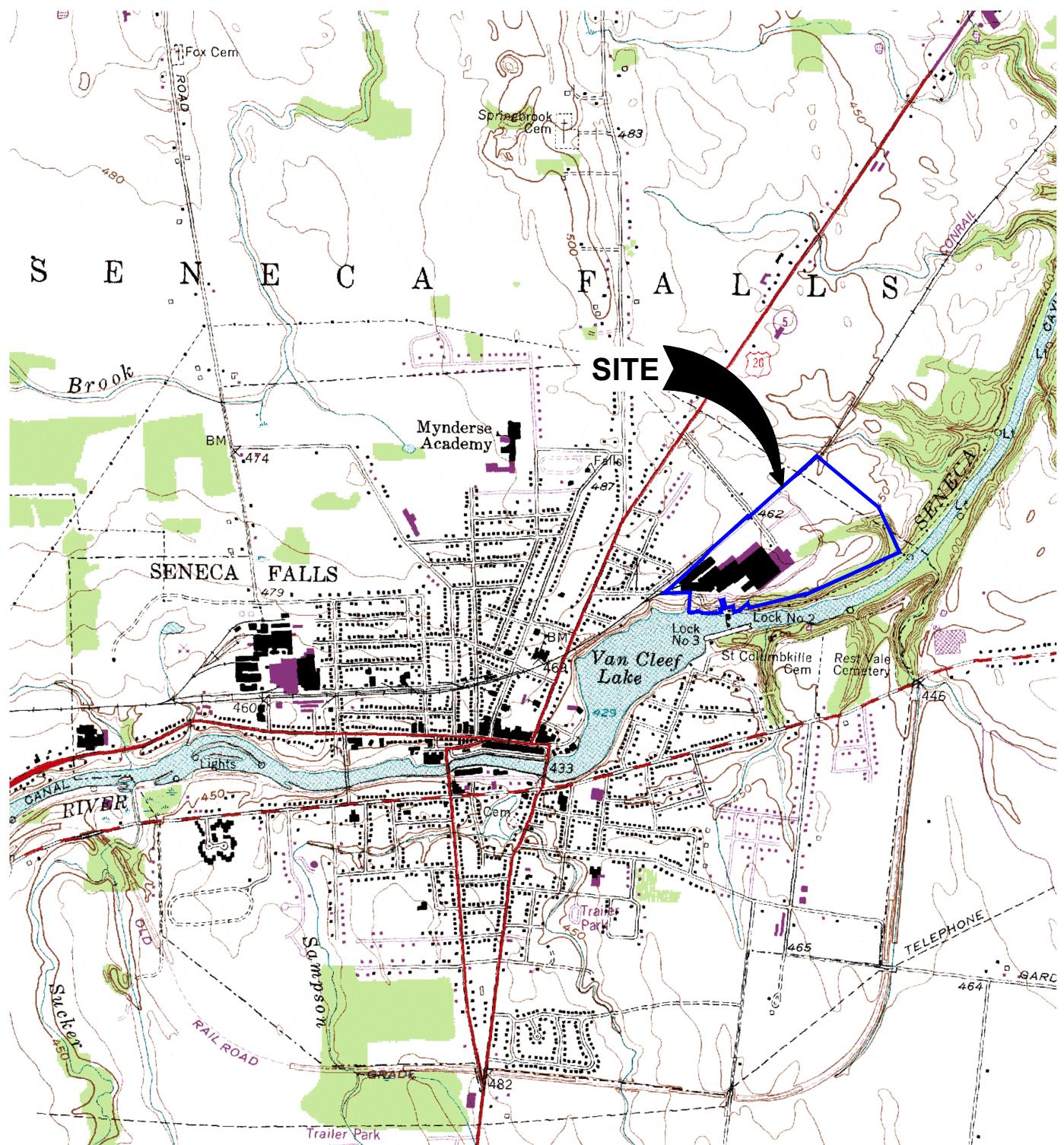
County Manager
Mitch Rowe
Seneca County Office Building
1 DiPronio Drive
Waterloo, NY 13165

County Planning Board
Jill Henry, Director
Seneca County Office Building
1 DiPronio Drive
Waterloo, NY 13165

APPENDIX C

Site Map





FORMER PHILIPS DISPLAY COMPONENTS FACILITY
 SENECA FALLS, NEW YORK

SITE LOCATION

Arcadis of New York, Inc.
855 Route 146
Suite 210
Clifton Park, New York 12065
Tel 518 250 7300
Fax 518 371 2757

www.arcadis.com