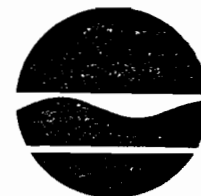


New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001



Henry G. Williams
Commissioner

DEC 31 1985

Dear Interested Citizen:

As you may know, on November 26, 1985, the State of New York, the United States of America and Occidental Chemical Corporation (OCC) submitted to the United States District Court in Buffalo documents describing a comprehensive remedial program to address the groundwater contamination attributable to OCC's Hyde Park Landfill located in the Town of Niagara. The documents are available for your review and comment. (Please refer to the enclosure titled, "Stipulation on Requisite Remedial Technology Program for the Hyde Park Landfill, Explanation.")

During the public comment period, representatives of the State of New York, the United States Environmental Protection Agency and Occidental Chemical Corporation will be available to explain various parts of the remedial program, answer your specific questions and assist you in your consideration of the remedial program developed for the Hyde Park Landfill. Also enclosed is a schedule of public meetings, and public availability sessions which we believe will cover the most important elements of the Hyde Park Remedial Program.

The first specific element of the Hyde Park Remedial Program to be discussed is the health and safety procedures to be observed during the remedial activities. These discussions will include a description of the special procedures to be used to protect workers performing the remedial activities and the special procedures that will be used to assure the safety of people living and working near the Hyde Park Landfill during the remedial activities. Enclosed is a summary of the Hyde Park Landfill Requisite Remedial Technology (RRT) Program, Section 12.0, Environmental Health and Safety Plan which provides an overview of the health and safety procedures. Please note the public comment period on the health and safety procedures ends on January 27, 1986. The health and safety procedures will be the topic of a public meeting to be held January 8, 1986, at 7:30 PM in Dunleavy Hall, Niagara University, Niagara Falls, New York.

Future public meetings are planned to discuss in detail other elements of the Hyde Park Remedial Program such as the "Community Monitoring Program" and the Industrial Protection Program specifically designed to protect those living and working near the Landfill from exposure to chemical contamination attributable to Hyde Park.

More Information is Available

The public comment period on all other elements of the Requisite Remedial Technology Program for the Hyde Park Landfill has been extended until February 24, 1986. The Requisite Remedial Technology Program (RRT) is a large and complex program. There is a very large amount of information regarding the RRT available for your review. Numerous technical documents have been prepared which provide insight into the basis for the Hyde Park Requisite Remedial Program.

However, the volume of information makes it impractical and impossible to cover all parts of the project in detail at public meetings, or in written summaries. It is important for you to read some of the reports and documents yourself. Participating in public meetings and discussions and reading the project information sent to you will give you a general overview and help you to understand what program aspects are particularly important. However, details and more specific information will be more readily found by taking the time to read the reports and documents yourself.

Please take advantage of the EPA PUBLIC INFORMATION OFFICE LOCATED IN NIAGARA FALLS AT THE CARBORUNDUM CENTER, SUITE 530, 345 THIRD STREET, 716-285-8842. All project documents are there for your review. The staff at the office will help you find information and documents you are interested in and help you to interpret information that is difficult to understand.

Sincerely,

for Samuel A. Gianti

Samuel Gianti
United States Environmental
Protection Agency
Hyde Park-Bloody Run Area
Program Coordinator

Norman H. Nosenchuck

Norman H. Nosenchuck, P.E.
Director
Division of Solid and Hazardous Waste
State Hyde Park-Bloody Run Area
Program Coordinator

DEC 31 1985

RRT CITIZEN PARTICIPATION PROGRAM

The RRT program is quite complicated and developing a full understanding of its various components will require a considerable commitment.

We want you to review, evaluate, and comment on the RRT program. The citizen participation program we have planned is designed to assist you in understanding what the program involves and providing opportunities for you to become familiar with it and to discuss it with us.

SCHEDULE

Monday,
November 25, 1985

MEET WITH the Intervenor and Amici, representatives of the Canadian Government and the Province of Ontario, Local, Regional, and State Officials prior to filing the stipulation with the court

Tuesday,
November 26, 1985

FILE STIPULATION WITH THE COURT. This marks the beginning of the legal public comment period

PRESS CONFERENCE

PUBLIC AVAILABILITY SESSION

Week of January 6-10, 1986

DISTRIBUTE a more detailed summary of HEALTH AND SAFETY PROGRAM (Section 12)

Tuesday,
January 7, 1986

MEET WITH INDIVIDUALS or groups to discuss HEALTH AND SAFETY PROGRAM - by appointment (716/285-8842)

Wednesday,
January 8, 1986

PUBLIC MEETING to present and discuss HEALTH AND SAFETY PROGRAM

7:30 P.M.
127 DUNLEAVY HALL
Niagara University

Thursday,
January 9, 1986
11 a.m. - 2 p.m.
6 p.m. - 9 p.m.

PUBLIC AVAILABILITY SESSION to provide opportunity for individuals or groups to further discuss and comment on HEALTH AND SAFETY PROGRAM

EPA PUBLIC INFORMATION OFFICE
Carborundum Center
Suite 350
345 Third St., N.F.

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Week of January 13-17, 1986 DISTRIBUTE a more detailed summary of the OVERBURDEN REMEDIES (includes: Introduction to the RRT (Section 1), Source Control (Section 2), Overburden RRT System/Industrial Protection Program (Section 3), Community Monitoring Program (Section 8).

Tuesday,
January 21, 1986

MEET WITH INDIVIDUALS or groups to discuss OVERBURDEN REMEDIES program - by appointment (716/285-8842)

Wednesday,
January 22, 1986

PUBLIC MEETING to present and discuss OVERBURDEN REMEDIES. Location to be announced.

Thursday,
January 23, 1986
11 a.m. - 2 p.m.
6 p.m. - 9 p.m.

PUBLIC AVAILABILITY SESSION to provide opportunity for individuals or groups to further discuss and comment on OVERBURDEN REMEDIES. EPA Public Information Office

EPA PUBLIC INFORMATION OFFICE
Carborundum Center
Suite 530
345 Third St., N.F.

Monday,
January 27, 1986

PUBLIC COMMENT PERIOD for HEALTH and SAFETY ENDS. All written comments must be filed at one of the following locations: EPA Public Information Office, 345 Third St., Niagara Falls; N.Y. 14303; N.Y.S. DEC, 600 Delaware Ave., Buffalo, N.Y. 14202; N.Y.S. DEC 50 Wolf Road, Albany, N.Y. 12233; U.S.E.P.A., 26 Federal Plaza, N.Y., N.Y. 10278

Week of January 27-31, 1986 DISTRIBUTE a more detailed summary of the BEDROCK REMEDIES.(includes: Lockport Bedrock RRT System (Section 4), Intermediate Formations Study (Section 5), Deep Formations Study (Section 6), Gorge Face Seep Program (Section 7 and Appendix A), Monitoring and Treatment (Sections 9,10,11).

Tuesday,
February, 4 1986

MEET WITH INDIVIDUALS or groups to discuss the BEDROCK REMEDIES - by appointment (716/285-8842)

Wednesday,
February 5, 1986

PUBLIC MEETING to present and discuss BEDROCK REMEDIES. Location to be announced.

SCHEDULE (Continued)

Thursday,
February 6, 1986
11 a.m. - 2 p.m.
6 p.m. - 9 p.m.

PUBLIC AVAILABILITY SESSION to provide opportunity for individuals or groups and to further discuss and comment on BEDROCK REMEDIES. EPA Public Information Office

EPA PUBLIC INFORMATION OFFICE
Carborundum Center
Suite 530
345 Third St., N.F.

Monday,
February 24, 1986

PUBLIC COMMENT PERIOD ENDS FOR THE RRT STIPULATION. All written comments must be filed at one of the following locations: EPA Public Information Office, 345 Third Street, Niagara Falls, 14303; N.Y.S. DEC, Delaware Ave, Buffalo, 14202; N.Y.S. DEC 50 Wolf Road, Albany, 12233; U.S.E.P.A., 26 Federal Plaza, N.Y., N.Y. 10278

We believe this citizen participation plan and schedule provide opportunity for extensive review and comment. We are, however, flexible and interested in hearing from you if you feel that the plan or schedule should be changed to improve your understanding of the RRT Study or to provide other types of opportunities for review and comment.

SUMMARY

HYDE PARK LANDFILL REQUISITE REMEDIAL TECHNOLOGY (RRT) PROGRAM SECTION 12.0, ENVIRONMENTAL HEALTH AND SAFETY PLANS

INTRODUCTION:

The Environmental Health and Safety Plan (RRT Safety Plan) is designed to protect the health and environment of the adjacent community and the health of workers during the RRT Program. The RRT Safety Plan applies to both Survey Activities (e.g. installation of wells) and Special Construction Activities (remedial construction such as the installation of the overburden barrier collection system). The RRT Safety Plan will be developed through the submission of plans and specifications to the EPA/STATE for review and approval. The plans and specifications must be consistent with the Section 12.0, Environmental Health and Safety Plan requirements.

The community and on-site workers are both protected through the development and implementation of air monitoring plans, an emergency plan and a particulate dispersion (dust suppression) control program. In addition the community is further protected by the development and implementation of site security and material access and removal control programs. Workers are further protected by Occupational Safety and Health Administration (OSHA) requirements, protective clothing and equipment and periodic medical examinations.

DEC 31 1985

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General Components of RRT Safety Plan

Air Monitoring Program

The air monitoring plan focuses on the potential source of vapors or dust at survey and working sites (e.g. well installations or trenching work). Air monitoring begins at the survey or working site and proceeds towards the community. This allows for early identification of a potential problem at the survey or working site and therefore the immediate initiation of corrective action. If the corrective action does not reduce or eliminate the problem, the drilling or construction activity will be stopped until proper corrective action can be completed successfully.

The type and location of air monitoring for Survey and Special Construction Activities are listed below:

Survey Activities

- (1) organic vapors - downwind perimeter of each survey site
- (2) particulate levels - at each survey site
- (3) flammability - at each survey site (downwind)

Special Construction Activities (remedial construction)

(1) organic vapors - at each working site

- downwind of each working site

(2) particulate levels - at each working site

- downwind of each working site

- at the perimeter of the site
(includes the measurement of
associated semi-volatile
organics, if required)

- beyond the perimeter of the
site in the community (in-
cludes the measurement of
associated semi-volatile
organics, if required)

(3) flammability - at the working site

Site Security

Site Security is required for both Survey and Special Construction Activities. The highlights of each are listed below:

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Survey Activities

- (1) survey site-temporarily fenced
- (2) regularly patrolled during non-working hours
- (3) access limited to authorized personnel

Special Construction Activities

- (1) fenced or otherwise secured to prevent unauthorized access
- (2) patrolled on a 24 hour basis
- (3) access limited to authorized personnel

The above actions minimize the occurrence of unauthorized persons from entering the survey or working site.

Particulate Dispersion Control/Material Access and Removal

To control dust emissions, the following must be done:

- (1) Excavated areas must be kept moist by a water misting system.
- (2) Soils transported from the working site to the landfill must be transported in tightly covered watertight containers.
- (3) Haul roads must be treated with appropriate dust control agents.

All vehicles used at any survey site or working site must be cleaned before they can be removed or driven from the site. Survey vehicles can, however, be driven from the survey site (after loose mud and debris removal) to the cleaning station. These procedures minimize the potential for contaminated soils being tracked through the community.

Emergency Plan

An emergency plan will be developed for both Survey and Special Construction Activities. The emergency plan provides a means to rapidly respond to on-site emergencies, should they occur. The emergency plan is part of the RRT Safety Plan and establishes procedures that must be implemented during defined emergencies at the site. Emergencies include occurrences such as:

- (1) personal injury

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- (2) hazardous materials spill (such as non-aqueous phase liquids)
- (3) fire/explosion
- (4) vapor emissions

The plan includes a listing of emergency personnel and organizations, and their telephone numbers. These people are contacted should an emergency occur. Emergency organizations include for example, the local police and fire agencies, hospitals, ambulance, and local industrial emergency response teams. Copies of the emergency plan must be provided to local hospitals, fire departments and police agencies. Emergency equipment such as fire extinguishers and emergency eye-wash/shower units are required. Personnel trained in first-aid techniques must be present at the site at all times.

Compliance with the RRT Safety Plan

The Occidental Chemical Corporation (OCC) Safety Officer is responsible for maintaining compliance with the RRT Safety Plan. This individual has the authority to suspend work. The EPA/STATE will oversee OCC's implementation of the RRT Safety Plan requirements through the presence of an on-site representative.