December 21, 2000

SITE INVESTIGATION WORK PLAN
RISEDORPH TANNERY

NYSDEC-1996 CLEAN WATER/CLEAN AIR BOND ACT ENVIROMENTAL RESTORATION PROJECT: INVESTIGATION

CITY OF GLOVERSVILLE
FULTON COUNTY

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1.0 INTRODUCTION

The City of Gloversville has been approved for funding by the New York State Department of Environmental Conservation (NYSDEC) under the Clean Water/Clean Air Bond Act of 1996 for performing an Environmental Restoration "Site Investigation" Project, more commonly referred to as the Brownfield Program.

To assist the City of Gloversville in the successful completion of the project, C.T. Male Associates, P.C. (C.T. Male) has prepared a work plan for the technical aspects of the project in accordance with the DEC revised Technical and Administrative Guidance Memorandum (TAGM) issued December 22, 1997 and entitled Municipal Assistance Environmental Restoration Projects, "Brownfield Program" (the "Procedures Handbook"). The Procedures Handbook sets forth the administrative and technical requirements for the completion of site investigation and/or site remediation.

This Final Site Investigation/Remedial Alternatives Report (SI/RAR) Work Plan has been reviewed by all parties involved and specifically addresses the comments prepared by NYSDEC in its December 11, 2000 letter to The Honorable Abraham V. Seroussi, Mayor of the City of Gloversville. Depending on the actual site conditions discovered though the performance of the investigation activities, modification of some of the plan activities may become necessary.

1.1 Project Objectives and Goals

The overall project objective is to identify and assess known and potential sources of contamination, and develop a comprehensive strategy to address and remediate the identified contamination, and ultimately demolish some or all of the site structures. As part of the site investigation activities, abandoned tannery materials and wastes within the property will be inventoried, characterized and properly disposed of off-site. The primary contaminants of concern are those associated with tannery practices as discussed in greater detail within Section 1.4. Additional contaminants of concern are petroleum based fuel products used in the general operation of the facility, asbestos, lead based paint, and PCBs. The goal of the site remediation alternative report will be to develop various strategies for the identified contaminants which will ultimately achieve compliance with established regulatory clean up guidance levels and criteria.

For this project, achieving the standard and guidance values established in the following NYSDEC documents will be the overall site remediation goal.

Division Technical and Administrative Guidance Memorandum (TAGM)
TAGM HWR-94-4046
Determination of Soil Cleanup Objectives and Cleanup Levels (Revised)
January 24, 1994

Spill Technology and Remediation Series
STARS Memo #1
Petroleum-Contaminated Soil Guidance Policy
August 1992

NYSDEC, 6 NYCRR Part 703.5
Surface Water and Groundwater Quality Standards
June, 1998

1.2 Objectives of SI/RAR Work Plan Requirements

To meet the overall project objective and goal, a detailed work plan is required to be developed, reviewed and approved prior to the initiation of site work. The overall objective of the SI/RAR Work Plan is to provide a detailed description of the approach for completion of the SI/RAR. The intent of the Work Plan is to present the methods and procedures that will be followed to assess the site from an environmental standpoint, and from which evaluations and decisions regarding site remediation activities can be developed. The goal of the Work Plan is to generate sufficient information to address the following site and contaminant characteristics:

- Identification and characterization of the sources of contamination;
- Determine the amount, concentration, persistence, mobility, state (solid, liquid) and other significant characteristics of the contamination present, both on-site and off-site;
- Evaluation of the extent to which natural or man made barriers currently contain the contamination;

- Definition of the extent to which the contaminants have migrated or are expected to migrate and whether future migration may pose a threat to human health or the environment;
- Identification of potential routes of exposure;
- Definition of hydrogeological factors (e.g. soil permeability, depth to saturated zone, hydrologic gradients, proximity to a drinking water aquifer, flood plain, or wetland;
- Groundwater characteristics and current and potential groundwater use;
- Identification of private wells in the area and development of an appropriate sampling plan for them;
- Identification of surface water classifications and existing use designations;
- Qualitatively describe the property's contribution to an air, land, water, biota, or food chain contamination problem; and
- Determination of the extent to which contamination levels pose an unacceptable risk to public health and/or the environment.

The SI/RAR references a site specific Field Sampling Plan (FSP) and a Quality Assurance Project Plan (QAPP) detailing how the site data will be acquired and determined usable with respect to the QAPP requirements. A site specific Health and Safety Plan (HASP) is also prepared to present procedures and protocols for site worker safety. Lastly, a Citizens Participation Plan (CP) is developed to foster communication and trust between the public and governmental agencies in order to restore and maintain the environment and protect public health. Each of these referenced plans will be presented in this Work Plan.

1.3 Project Site Background

The Risedorph Tannery has been in existence from possibly the mid 1800's. It is reported that the tannery performed all aspects relative to the finishing of leather hides. For the years of operation prior to the establishment of waste water treatment facilities in the City's of Gloversville and Johnstown, it is inferred that the liquid wastes

generated in the various tanning and finishing processes were discharged to the creek flowing through the site. At some point in time, the area tanneries were mandated by the government to construct and maintain waste water pretreatment plants and monitoring stations.

In the mid 1980's, Risedorph Tannery was shut down, apparently leaving it in an "as is" condition. The tannery has remained idle since then; however, several of the out buildings were apparently used by Allied Split for hide storage.

In 1994, the NYSDEC performed a Multimedia Pollution Prevention (M2P2) inspection of a number of tanneries in the Gloversville/Johnstown region, the Risedorph Tannery being amongst those inspected. According to the M2P2 inspection, the NYSDEC concluded there were no hazardous wastes generated or present on-site, and that numerous materials containers/drums of chemical materials were present within the site. It was recommended that if the materials were not usable, they should be properly managed.

In 1995, a re-inspection of the tanneries inspected in 1994 was completed by NYSDEC. It is reported that since there was no change at the Risedorph facility, a re-inspection of the tannery was not performed.

1.4 Overview of Leather Tanning and Finishing

The tanning and finishing of hides involves many processes, each of which utilizes particular chemicals and generates various liquid and solid waste streams. As the Risedorph facility is reported to have completed full processing activities at one time or another, it is currently anticipated that all of the following processes and generation of wastes could potentially be associated with the site.

PROCESS	CHEMICALS USED	WASTE WATER	SOLID WASTE
Hide Soaking	Water, Disinfectants, Surfactants, Sodium Salts	Dirt, Blood, Salt Proteins, Chemicals	
Fleshing		Fleshings	Fats
Unhairing	Water, Calcium Hydroxide, Sodium Sulfide, Proteolytic Enzymes, Nonionic Surfactants	High pH, Proteins, Sulfides and other chemicals	
Bate	Deliming chemicals, Ammonium Sulfate, Ammonium Chloride	NH3 and other chemicals	
Pickle	Salt Acid (H2SO4)	Low pH (H2SO4)	
Tan	Water, Tanning Agents, Chromium Compounds, Alum, Syntans, Gluteraldhydes, Heavy Oils	Unfixed Tanning Agents	
Wring/ Slit and Shave		Unfixed Tanning Agents	Shavings
Retan	Water, Tanning Agents, Chromium Compounds, Alum, Syntans, Gluteraldhydes, Heavy Oils	Unfixed Tanning Agents	
Bleaching and Coloring	Sodium Bicarbonate, H2SO4, Dyes and Pigments, Waters, Biocides	Unfixed Dyes and Pigments	
Fat Liquoring	Fats(oils) Water, Chemical Emulsifiers	Oils	
Setting Out/Drying		Pasting , Plate Wash	Vacuum Dust
Buffing, Finishing and Coating	Volatile Organics	Excess Chemicals, Finishing Residues	Buffing Dust
Wastewater Treatment		POTW	Screening and Sludge

The specific chemicals that are generalized above which may or may not have been used at the facility include the following:

• Biocides:	Paranitrphenol and 2-phenylphenol
• Pickling Compounds	Sulfuric Acid
• Tanning Agents	Chromium Compounds, cresols, formaldehyde, phenol
• Dyes, Pigments and Coloring Agents	Titanium dioxide, organo-metallic dye/pigments (barium, cadmium, chromium, cobalt, copper, lead, nickel and zinc compounds), Acid Blue 9, Basic Green4, Direct Black38, cyanide containing compounds.
• Miscellaneous Solvents & Chemicals	Acetone, ammonia, chorine, 1,2 dichlorobenzene, dichloromethane, n-dioctylphthalate, ethyl benzene, glycol ethers, hexachloroethane, hydrochloric acid, MEK, phosphoric acid, sodium hydroxide, PCE, 1,1,1-TCE, TCE toluene and xylene.

1.5 Project Schedule

A specific project work schedule has been developed and is presented as Exhibit 5. The schedule presents the major work task items to be completed starting with the submission of this work plan, through the NYSDEC Record of Decision. It is planned to initiate the first field investigation task during the week of October 30, 2000. It is currently anticipated that the field investigation work will be completed by the end of January 2001 with the Draft SI/RAR report submitted within the following 5 weeks following receipt of independent validation of the laboratory data (DUSR). The final aspect of the project, the Record of Decision is anticipated to be issued during the summer of 2001.

2.0 PROJECT SCOPE

Based on the history of the facility, its closing in the early 1980's, and little upkeep since that time, it appears that the tannery remains as it was left since it was shut down. According to City personnel, there is little to no salvage value to the equipment and materials within the site buildings. Based on the review of the Multimedia Pollution Prevention (M2P2) information for the Risedorph Facility made available for review, there are a number of environmental issues dealing with wastewater, petroleum and chemical bulk storage tanks, hazardous substances and solid wastes. Based on the observations made at the site during the pre bid meeting and subsequent site visits, and the 1995 M2P2 information, the areas/conditions for which further investigation/evaluation are warranted are presented in the following section. The outline of areas/conditions that are proposed to be evaluated may need to be modified to some extent, based on the findings of the investigations made in the field.

2.1 Investigative Approach

The project site will be investigated through the completion of specific tasks as outlined in the following sections. As this is a draft plan or working document, certain aspects of the proposed investigative tasks may be expanded or deleted as a function of its review by the NYSDEC.

2.1.1 Site Survey

A boundary survey of the site, including the existing site features will be completed by a NYS Licensed Land Surveyor. The property corners will be staked, and a metes and bounds description with will also be provided. Following the completion of the various site investigation activities, the survey map will be updated to include the location of test pits, monitoring wells, monitoring well elevations, test borings and geophysical data.

2.1.2 Inventory, Characterize and Dispose of Abandoned Materials

This activity will involve inventorying, cataloging, and characterizing material containers within the site. USTs and ASTs will be assessed for materials present, and any materials found to be present will be sampled and analyzed by appropriate

methods for characterization. Smaller volume containers will be assessed in a similar manner. A lab pack team will be employed for characterizing, inventorying, and relocating these materials to a secure portion of the site. As one of the three out buildings is being considered for salvage and reuse, this building may be an appropriate location for the temporary storage of these materials. If any materials are defined as hazardous waste, RCRA TSDF regulations pertaining to the storage of such materials for a period of greater than 90 calendar days may apply. Once all of the materials have been inventoried and characterized they will be taken off site for proper treatment and/or disposal. The materials, containers and vessels which will be included under this task are as follows:

- The UST along Wilson Avenue;
- All ASTs within the site, including the #6 fuel oil tank, kerosene tank, sulfuric acid tanks, and the abandoned tanks within the western section of the site;
- All of the composite holding tanks (7 estimated) within the tannery;
- All bulk solid materials within the tannery and out buildings including dry materials and goods on the floor surfaces of the buildings, and
- All metal, plastic and fiber drums and other material containers of various sizes and composition.

2.1.3 Ground Penetrating Radar Survey

To assist in locating potential buried structures, such as USTs, piping, dry wells, drums, a ground penetrating radar (GPR) survey of the site will be completed. The locations of suspected buried features will be identified on the ground with both paint and flagging. The location of the surface markings will then be tied into the existing site features identified on the site survey map through tape measurements from building corners or other permanent features.

2.1.4 Evaluation of Storm Water System Including Purported French Drain

Dye testing of the facility's stormwater system and purported french drain system will be performed to determine their outfall locations. Sediment samples at the outfall location will be collected and analyzed for the Target Compound List (TCL) of volatile and semi volatile organic compounds, PCBs, Pesticides and Cyanide, and the Target Analyte List (TAL) of inorganic metals. Sediment samples will also be collected from the stormwater catch basin or clean out (french drain) immediately upstream from the outfall locations and analyzed for the same. Dependent upon the compounds and analytes detected, additional catch basins or clean outs may be sampled and analyzed for the compounds and analytes of concern. In this manner the extent to which these systems will need to be decontaminated will be defined.

2.1.5 Evaluation of Floor Drains

It has been reported that all of the floor drains within the site buildings discharge to the wastewater pretreatment system. As several drain systems may be present within the site, accessible portions of each drain system will be evaluated for residuals and sediments. Depending on the results of this assessment, a sample of the residual material or sediment from each drain system will be collected for analyses for the TCL and TAL compounds and analytes. For budgeting purposes, four samples will be collected for laboratory analysis. The results of this effort will be used to evaluate the need for decontaminating the floor drain systems during the remediation and demolition activities.

2.1.6 Evaluation of Pretreatment Waste Water Plant

According to the M2P2, the major contaminant of concern relating to the pretreatment wastewater treatment system is chromium. However, since the site has been inactive for a period of time and subject to vandalism and occupation by local trespassers, there is a possibility that the pretreatment tanks have been subjected to the dumping of materials other than what would normally be expected in an operational and maintained tannery. As such, it is proposed to assess each pretreatment tank for sludge, and if present, sample the sludge and water, and analyze it for appropriate parameters. The Gloversville/Johnstown Joint Sewer Authority has been called with respect to possibly sending the water and sludge to their facility. Depending on the

character of the water and sludge, the Sewer Authority may be willing to accept the material. The Sewer Authority will be consulted with respect to the analysis required to characterize the water and sludge. If the Gloversville/Johnstown Joint Sewer Authority refuses to accept the material, the sludge and water will be analyzed for the TCL and TAL parameters, and other disposal options will be explored.

2.1.7 Subsurface Evaluation of USTs

To determine if there has been a release from any of the USTs identified within the site, the subsurface conditions at each UST location will be performed through the utilization of exploratory test pits. Test pits will be advanced on at least two sides of each tank and extended to a depth at least that of the bottom elevation of the tank and beyond if possible. Excavated soils will be screened for the presence of volatile organic compounds with a Photo Ionization Detector (PID) equipped with a lamp suitable ionizing the material previous documented to be stored. One soil sample will be collected from one of the test pits, from the bottom of the excavation and submitted for TCL and TAL analyses. If evidence of soil or groundwater contamination is observed, the Site Wide Hydrogeologic Evaluation scope will be expanded to include additional monitoring wells completed within the UST location to define the extent of the contamination. Test pits will also be performed along the route of the reported buried piping between the elevated heating oil tank and boiler room, adjacent to the heating oil tank, and beneath the tank cradles west of the beam shop.

2.1.8 Subsurface Investigation of Back Lot

A 50 foot sampling grid will be established within the rear sections of the site, north of the upper pond and the creek feeding the pond. Depending on the findings of the GPR survey within this area additional exploratory points may also be selected. The area will be assessed with exploratory test pits completed at a representative number of the grid points and at any anomalies identified by the GPR survey. Excavated soils and materials will be visually classified and screened via organoleptic perception and with a PID. Depending on what is discovered during this effort will dictate the number of soil samples that will collected for laboratory analysis. At a minimum, four soil samples will be collected and analyzed for TCL and TAL parameters if no evidence of contamination within the soils are noted. Groundwater will not be collected from the

test pits, but will be collected from the monitoring well to be installed within this area of the site for the Site Wide Hydrogeologic Evaluation discussed below as a separate work task.

2.1.9 Evaluation of Pond and Creek Sediments and Surface Waters

Two sediment samples will be collected from the upper and lower ponds, and from two locations within the creek down stream from the lower pond dam. The sediment samples will be analyzed for the full list of TCL and TAL parameters and analytes. Additionally, surface water samples will be collected from the creek at the point it enters onto the site, below each pond dam, and immediately prior to it exiting the property along Wilson Street. The water samples will be analyzed for the full list of TCL and TAL parameters and analytes.

2.1.10 Fish and Wildlife Impact Analysis

An Ecological Risk Assessment (ERA) will be completed for this project. The level at which the ERA is completed will be based on the October 1994 NYSDEC Fish and Wildlife Impact Analysis (FWIA) for Inactive Hazardous Waste Sites and its Decision Chart in Appendix C. The FWIA Decision Chart is written in steps such that decisions points are established for determining when the process is complete and further assessment is unnecessary.

At a minimum, a partial description of the site will be prepared to determine if fish and wildlife resources are present at the subject site. If fish and wildlife resources are present which may be affected by site-related contaminants, a complete site description as outlined in Step I of the FWIA will be completed. If no resources are associated with the site or if there is no potential for contaminant migration to the resources, then only the necessary information to support that conclusion will be provided. If there is potential for migration to resources identified, further evaluation pursuant to the FWIA will be performed.

2.1.11 Asbestos and Lead Based Paint Pre Demolition Survey

The asbestos survey will involve a review of any previously prepared reports and/or drawings that provide information regarding ACM locations, and survey all building

spaces for evidence of asbestos containing materials (ACM) in the following forms, at a minimum:

- Sprayed or trowelled on surfacing materials;
- Insulation on pipes, boilers, ducts, and other facility equipment; and
- Miscellaneous forms of ACM such as wallboard, ceiling tiles, floor tiles, roofing, etc.

Bulk samples of any building materials suspected of containing asbestos will be collected and analyze to determine asbestoform type and content. Materials containing asbestos content of more than 1% shall be identified as asbestos containing materials. The result of the survey will be presented in the SIR/RAR.

A pre-demolition assessment of the building for lead based paint is not required by regulation at this time. However, the demolition contractor is required to be aware of the presence of lead based paint so that proper worker protection controls can be established and maintained during the site work. The lead based assessment will involve the collection of paint chip samples from the various sections of the building for laboratory analysis. The results of the assessment will be reported in the SI/RAR, and made available for use by the demolition contractor.

2.1.12 Evaluation of Electrical Motors and Transformers

During the pre bid site walk and subsequent site visits, several electrical motors and small transformers which may be liquid filled were identified within the buildings. Assessment of this equipment will be completed to determine if they are liquid filled, and if so, are they PCB containing. To determine if the equipment is PCB containing, information on the equipment will be recorded and then used to research through the various manufactures for the known presence of PCB. If this is inconclusive, the fluids from each piece of suspected equipment will be sampled and analyzed for PCBs.

2.1.13 Assessment of Building Materials

An assessment of the various building materials will be completed for the purpose of grouping materials of similar composition for on-site staging during the demolition process. Groupings may consist if wood flooring and support structure from the beam

shop, flooring and support structure from the 2nd floor above the beam shop, the wooden wheels within the beam shop, concrete flooring within the wet room, concrete flooring within the beam shop, general concrete flooring from other non-process areas, etc. Once the various material groups are established, a representative number of samples will be collected from each grouping and analyzed for chemical parameters and analytes that would define the composition of the material for disposal purposes.

2.1.14 Site Wide Subsurface/Hydrogeologic Evaluation

A site wide subsurface/hydrogeologic evaluation of the site will be performed to develop a clear understanding of the conditions within the site and to provide the necessary data for meeting the project objectives outlined in Section 1.2. The evaluation will involve the completion of exploratory test borings converted to permanent groundwater monitoring wells. It is expected that approximately 10 boring/monitoring wells will be installed within the site, in the following areas:

- One on the south side of the creek, between the creek and West Eighth Street,
- One along the eastern side of the beam shop, and west side of Wilson Ave. An additional well may be installed adjacent to the suspected UST located in this area.
- Two upgradient wells along the northern property line.
- One within the open area west of the beam shop and north of the boiler room.
- One south of each of the three out buildings and one along the eastern side of the buildings, and
- One within the vacant lands immediately north of the upper pond.

The depth to groundwater is expected to be within 10 feet from grade. The borings will be advanced to the top of bedrock or dense glacial till, which ever occurs first. Bedrock drilling is not anticipated at this time.

Geoprobe test borings will also be completed within the wet area of the tannery. Up to 5 geoprobes converted to monitoring wells will be completed during this activity.

The monitoring well locations will serve as permanent groundwater sampling points. One round of groundwater samples will be collected from the monitoring wells and analyzed for the TCL and TAL parameters. Each location will be tied into existing site structures, and the elevation of each will be determined through differential leveling techniques. Water levels from the wells will be collected on various dates to be used to develop the groundwater flow patterns beneath the site. Based on the soil conditions encountered, the wells will be used to determine the permeability values of the various soil stratums.

One soil sample from each boring location will be selected for laboratory analysis on the basis of subjective evidence of contamination (elevated PID readings and organoleptic perception). If no evidence of subsurface soil contamination is noted above the water table, a surface soil sample from the top six inches of the soil (or directly beneath asphalt pavement) will be secured for analysis. The surficial soil sample results will assist in determining if contact with the surficial soils is a route of exposure to site contamination. As the reuse of the site is currently anticipated to be for recreational purposes, this data is of some importance.

2.1.15 Evaluation of Boiler Room Equipment

The equipment within the boiler room will be assessed for the purpose of decommissioning and disposal beyond the evaluation for asbestos. Components of the boiler system will be evaluated for evidence of materials which would need to be removed and disposed of other than as construction and demolition debris or scrap metal.

2.1.16 Surface Soil Sampling and Analysis

The site has the potential to be used for unrestricted recreational use following the completion of the project. As such, a 100 foot by 100 foot grid will be established over the entire project site (approx. 12 acres) for the purpose of defining surface soil sampling locations. From within each grid cell, a surficial soil sample will be secured for laboratory analysis. The samples will be collected at grade if the sampling point does not lie within a paved area (i.e. asphalt or concrete) or a within a vegetated location (i.e. grass). At those locations where the location is paved, the surficial soil sample shall be collected directly from beneath the pavement material to a depth of six

inches. At those location where a vegetative cover exists, it will be removed to a point below the root zone. Samples will then be collected to a depth of six inches below the root zone. At sampling locations were leaf litter is present, the litter will be removed prior to collecting the sample down to a depth of six inches. The surface soil samples will be analyzed for the Target Compound List (TCL) of volatile and semi volatile organic compounds, PCBs, Pesticides and Cyanide, and the Target Analyte List (TAL) of inorganic metals at a maximum.

As discussed in Section 2.1.14 above, it may be possible to eliminate the collection of surface soil samples at some of the grid cells, as there may a number of soil boring samples collected at grade during the subsurface investigation that would satisfy this requirement.

Dependent upon the results of the site wide characterization investigation described above, the analysis of the surface soil samples may be reduced to include only those groups of parameters determined to be of concern. Prior to the initiation of the surface soil sampling event, NYSDEC and NYSDOH will be consulted relative to the number of samples to be collected and the parameters to be analyzed.

3.0 DRAFT SITE INVESTIGATION / REMEDIAL ALTERNATIVES REPORT

Within 45 days of the completion of the field activities and receipt of the analytical laboratory data, a draft SI/RAR will be prepared. The draft report will be prepared in accordance with Sections 5.2.1, 5.3, 5.4 and Appendix 1 of the Municipal Assistance Environmental Restoration Projects Procedures Handbook.

4.0 QUALITY ASSURANCE / QUALITY CONTROL PLAN

The Quality Assurance/Quality Control Plan (QA/QC) Plan is submitted as Exhibit 2 with this work plan. The plan describes the QA/QC procedures to be followed at the time media samples are collected in the field, to the time they are analyzed by the

environmental analytical laboratory and evaluated by a third party according to the NYSDEC DUSR guidelines.

The QA/QC plan will be utilized and followed by field personnel during the site investigation activities and media sampling events. It will also be used by the project management team to assure the data being collected and generated is representative and accurate. The laboratory results will be reported with NYSDEC ASP Category B deliverables.

5.0 FIELD SAMPLING PLAN

A site specific Field Sampling Plan (FSP) has been developed (Exhibit 1) for the project which conforms closely to the QA/QC plan. The sampling describes in detail the various methods and techniques to be followed during the completion of the test borings, Geoprobes, monitoring well installations, test pit excavations, headspace screening of soils, collection of soil, groundwater, surface water and sediment samples for laboratory analysis, sample handling and chain of custody procedures.

6.0 SITE SPECIFIC HEALTH AND SAFETY PLAN

A site specific Health and Safety Plan (HASP) (Exhibit 3) has been prepared for this project and is appended. The HASP addresses site worker health and safety issues. Although the plan addresses all of the site activities to be performed, the subcontractors to be utilized will be required to develop their own HASP relative to work they will be performing.

7.0 CITIZENS PARTICIPATION PLAN

A project specific Citizen Participation Plan (CP Plan) has been be developed for this project (Exhibit 4) in general accordance with the Environmental Restoration Project, Clean Water/Clean Air Bond Act of 1996, Brownfields Procedures Handbook. The objective of the plan is to disseminate information to the public regarding the SI/RAR and to involve the public in the decision making process. This is accomplished by keeping the public informed of the investigation through direct mailing, periodic community meetings, pubic notice in local newspapers and other publications, and by having project documents available for review at public accessible repository locations. The CP Plan should be considered an integral part of the Work Plan.

FIGURES