

New York State Department of Environmental Conservation

Brownfield Cleanup Program

Citizen Participation Plan for Former JML Optical Site

678-690 Portland Avenue
City of Rochester
Monroe County, New York

September 2009

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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 brownfield site’s remedial process.

Applicant: **690 Portland Avenue Company (“Applicant”)**
Site Name: **Former JML Optical Site (“site”)**
Site Address: **678-690 Portland Avenue, Rochester, NY**
Site County: **Monroe**
Site Number: **C828151**

1. What is New York’s Brownfield Cleanup Program?

New York’s Brownfield Cleanup Program (BCP) is designed to encourage the private sector to investigate, remediate (clean up) and redevelop brownfields. A brownfield is any real property where redevelopment or reuse may be complicated by the presence or potential presence of a contaminant. A brownfield typically is a former industrial or commercial property where operations may have resulted in environmental contamination. A brownfield can pose environmental, legal and financial burdens on a community. If the brownfield is not addressed, it can reduce property values in the area and affect economic development of nearby properties.

The BCP is administered by the New York State Department of Environmental Conservation (NYSDEC) which oversees Applicants that conduct brownfield site remedial activities.¹ An Applicant is a person whose request to participate in the BCP has been accepted by NYSDEC. The BCP contains investigation and remediation (cleanup) requirements, ensuring that cleanups protect public health and the environment. When NYSDEC certifies that these requirements have been met, the property can be reused or redeveloped for the intended use.

For more information about the BCP, go online at: www.dec.state.ny.us/website/der/bcp .

2. Citizen Participation Plan Overview

This Citizen Participation (CP) Plan provides members of the affected and interested public with information about how NYSDEC will inform and involve them during the investigation and remediation of the site identified above. The public information and involvement program will be carried out with assistance, as appropriate, from the Applicant.

Appendix A contains a map identifying the location of the site.

Project Contacts

Appendix B identifies NYSDEC project contact(s) to whom the public should address questions or request information about the site’s remedial program. The public’s suggestions about this CP

¹ “Remedial activities”, “remedial action”, and “remediation” are defined as all activities or actions undertaken to eliminate, remove, treat, abate, control, manage, or monitor contaminants at or coming from a brownfield site.

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.

Document Repositories

The locations of the site's document repositories also are identified in Appendix B. The document repositories provide convenient access to important project documents for public review and comment.

Site Contact List

Appendix C contains the brownfield site contact list. This list has been developed to keep the community informed about, and involved in, the site's investigation and remediation process. The brownfield 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 remedial activities at the site (such as fieldwork), as well as availability of project documents and announcements about public comment periods.

The brownfield site contact list includes, at a minimum:

- chief executive officer and official(s) principally involved with relevant zoning and planning matters 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;
- document repositories.

Where the site or adjacent real property contains multiple dwelling units, the Applicant will work with NYSDEC to develop an alternative method for providing such notice in lieu of mailing to each individual. For example, the owner of such a property that contains multiple dwellings may be requested to prominently display fact sheets and notices required to be developed during the site's remedial process. This procedure would substitute for the mailing of such notices and fact sheets, especially at locations where renters, tenants and other residents may number in the hundreds or thousands, making the mailing of such notices impractical.

The brownfield 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 B. Other additions to the brownfield site contact list may be made on a site-specific basis at the discretion of the NYSDEC project manager, in consultation with other NYSDEC staff as appropriate.

CP Activities

Appendix D identifies the CP activities, at a minimum, that have been and will be conducted during the site's remedial program. The flowchart in Appendix E shows how these CP activities integrate with the site remedial process. The public is informed about these CP activities through fact sheets and notices developed at significant points in the site's remedial process.

- **Notices and fact sheets** help the interested and affected public to understand contamination issues related to a brownfield site, and the nature and progress of efforts to investigate and remediate a brownfield 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 brownfield site's investigation and remediation.

The public is encouraged to contact project staff at any time during the site's remedial process with questions, comments, or requests for information about the remedial program.

This CP Plan may be revised due to changes in major issues of public concern identified in Section 6 or in the nature and scope of remedial activities. Modifications may include additions to the brownfield site contact list and changes in planned citizen participation activities.

3. Site Information

Site Description

The site is an approximately 1.565-acre parcel of land located at 678-690 Portland Avenue in the City of Rochester, Monroe County, New York. The site consists of three one story buildings, paved surfaces, a mowed grass area along the Portland Avenue entrance to the site and a strip of grass along the eastern property (rear side of the building).

The site and neighboring properties are currently located in a Industrial (M-1) zoning district according to the City of Rochester Department of Community Development, Bureau of Building and Zoning, except for the parcel located immediately south of the site (76 Fernwood Avenue), which is zoned Low Density Residential (R-1).

The site is bordered to the north by a paved parking lot owned by the City of Rochester and to the east by a vacant industrial building, located at 100 Fernwood Avenue, which was formerly operated under the name Vogt Manufacturing and currently listed as a NYSDEC Brownfield site. The site is bordered to the south by a parking lot and a single family residence. A vacant industrial building (a NYSDEC Inactive Hazardous Waste Disposal Site known as Preferred Electric Motors) is also located to the south of the property at 42 Fernwood Avenue. The site is bordered to the west by Portland Avenue. Along the west side of Portland Avenue is a vacant commercial building and a distribution facility. There are also four residential properties located immediately adjacent to the west side of the site.

A figure showing the location of the site is included in Appendix A.

Site History

The site was undeveloped until approximately 1930 at which time ILEX Optical constructed the original portion of the building on the site to commence lens manufacturing operations. In December 1979, the 690 Portland Avenue Company purchased the property and JML Optical, Inc. (JML) operated at the site until November 2005, at which time the JML manufacturing operations were relocated to Pittsford, New York. The site has remained vacant and under the ownership of the 690 Portland Avenue Company since 2005.

ILEX Optical and JML reportedly utilized several chemicals, including, but not limited to, trichloroethylene (TCE), acetone, and isopropyl alcohol (IPA) during the manufacturing and cleaning of specialty optical lenses. Additionally, a 5,000-gallon No. 2 fuel oil underground storage tank (UST) was once located between the boiler house and manufacturing building and utilized for the boilers.

Investigations conducted at the site have identified that solvent-related compounds, primarily TCE, have been released in the sump located adjacent to the maintenance shop in the main building on the site and in the former degreasing area located near the western end of the former manufacturing building. Petroleum-related contamination was identified in the location of the former 5,000-gallon UST. Additionally, it appears that solvent-related compounds released at the Preferred Electric Motors, Inc. site have impacted the groundwater quality at the south end of the site and petroleum-related compounds associated with the former Vogt Manufacturing /100 Fernwood Avenue site have migrated onto the eastern side of the site.

Environmental History

A Phase I Environmental Site Assessment (ESA) was completed by Labella Associates, P.C. (Labella) for the site in February 2005. Recognized environmental conditions (identified included:

- Subsurface petroleum contamination observed during the removal of a 5,000-gallon No. 2 fuel oil underground storage tank;
- Floor drains in the area of chlorinated solvent (particularly TCE) usage with an unknown historical discharge location;
- A sump of unknown origin; and
- An inactive hazardous waste disposal site (Preferred Electric Motors, Inc.) and a BCP site (Vogt Manufacturing) situated on adjacent properties.

A Phase II Environmental Site Assessment Preliminary Site Characterization was completed by Labella in June 2005 and a Phase II (ESA) Supplemental Site Characterization was conducted in June 2006 to investigate the Regional Environmental Concerns. Soil and groundwater samples collected confirmed the presence of petroleum-related contaminants, chlorinated solvents, and semi-volatile organic compounds (SVOCs) in the soil and groundwater beneath the site. There are no known significant sources of polychlorinated biphenyls (PCBs), pesticides, or herbicides on the site.

A 5,000-gallon No. 2 fuel oil Underground Storage Tank was once located between the boiler house and manufacturing building and utilized for the boilers. At the time of the tank removal in 1999, impacted soil and a sheen on the groundwater was observed in the excavation. Spill No. 9870600 was reported to the NYSDEC on March 29, 1999 based upon the contamination observed. Where possible, contaminated soils were reportedly excavated and disposed of off-site.

4. Remedial Process

Note: See Appendix E for a flowchart of the brownfield site remedial process.

Application

The Applicant has applied for and been accepted into New York's Brownfield Cleanup Program as a Participant. This means that the Applicant was the owner of the site at the time of the disposal or discharge of contaminants or was otherwise liable for the disposal or discharge of the contaminants. The Participant must fully characterize the nature and extent of contamination onsite, as well as the nature and extent of contamination that has migrated from the site. The Participant also must conduct a "qualitative exposure assessment," a process that characterizes the actual or potential exposures of people, fish and wildlife to contaminants on the site and to contamination that has migrated from the site.

The Applicant in its Application proposes that the site will be used for unrestricted purposes.

To achieve this goal, the Applicant will conduct remedial activities at the site with oversight provided by NYSDEC. The Brownfield Cleanup Agreement executed by NYSDEC and the Applicant sets forth the responsibilities of each party in conducting a remedial program at the site.

Investigation

If the Applicant conducts a remedial investigation (RI) of the site, it will be performed with NYSDEC oversight. The Applicant must develop a remedial investigation workplan, which is subject to public comment as noted in Appendix D. The goals of the investigation are as follows:

- 1) Define the nature and extent of contamination in soil, surface water, groundwater and any other impacted media;
- 2) Identify the source(s) of the contamination;
- 3) Assess the impact of the contamination on public health and/or the environment; and
- 4) Provide information to support the development of a Remedial Work Plan to address the contamination, or to support a conclusion that the contamination does not need to be addressed.

The Applicant will prepare an RI Report after it completes the RI. This report will summarize the results of the RI and will include the Applicant's recommendation of whether remediation is needed to address site-related contamination. The RI Report is subject to review and approval by NYSDEC. Before the RI Report is approved, a fact sheet that describes the RI Report will be sent to the site's contact list.

NYSDEC will determine if the site poses a significant threat to public health and/or the environment. If NYSDEC determines that the site is a "significant threat," a qualifying community group may apply 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 eligible site.

For more information about the TAG Program and the availability of TAGs, go online at: www.dec.state.ny.us/website/der/guidance/tag/.

Remedy Selection

After NYSDEC approves the RI Report, the Applicant will be able to develop a Remedial Work Plan if remediation is required. The Remedial Work Plan describes how the Applicant would address the contamination related to the site.

The public will have the opportunity to review and comment on the draft Remedial Work Plan. The site contact list will be sent a fact sheet that describes the draft Remedial Work Plan and announces a 45-day public comment period. NYSDEC will factor this input into its decision to approve, reject or modify the draft Remedial Work Plan.

A public meeting may be held by NYSDEC about the proposed Remedial Work Plan if requested by the affected community and if significant substantive issues are raised about the draft Remedial Work Plan. Please note that, in order to request a public meeting, the health, economic well-being or enjoyment of the environment of those requesting the public meeting must be threatened or potentially threatened by the site. In addition, the request for the public meeting should be made within the first 30 days of the 45-day public comment period for the draft Remedial Work Plan. A public meeting also may be held at the discretion of the NYSDEC project manager in consultation with other NYSDEC staff as appropriate.

Construction

Approval of the Remedial Work Plan by NYSDEC will allow the Applicant to design and construct the alternative selected to remediate the site. The site contact list will receive notification before the start of site remediation. When the Applicant completes remedial activities, it will prepare a final engineering report that certifies that remediation requirements have been achieved or will be achieved within a specific time frame. NYSDEC will review the report to be certain that the remediation is protective of public health and the environment for the intended use of the site. The site contact list will receive a fact sheet that announces the completion of remedial activities and the review of the final engineering report.

Certificate of Completion and Site Management

Once NYSDEC approves the final engineering report, it will issue the Applicant a Certificate of Completion. This Certificate states that remediation goals have been achieved, and relieves the Applicant from future remedial liability, subject to statutory conditions. The Certificate also includes a description of any institutional and engineering controls or monitoring required by the approved remedial work plan. If the Applicant uses institutional controls or engineering controls to achieve remedial objectives, the site contact list will receive a fact sheet that discusses such controls.

An institutional control is a non-physical restriction on use of the brownfield site, such as a deed restriction that would prevent or restrict certain uses of the remediated property. An institutional control may be used when the remedial 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 a cap or vapor barrier.

Site management will be conducted by the Applicant as required. NYSDEC will provide appropriate oversight. Site management involves the institutional and engineering controls required for the brownfield site. Examples include: operation of a water treatment plant, maintenance of a cap or cover, and monitoring of groundwater quality.

5. Citizen Participation Activities

CP activities that have already occurred and are planned during the investigation and remediation of the site under the BCP are identified in Appendix D: Identification of Citizen Participation Activities. These activities also are identified in the flowchart of the BCP process in Appendix E. NYSDEC will ensure that these CP activities are conducted, with appropriate assistance from the Applicant.

All CP activities are conducted to provide the public with significant information about site findings and planned remedial activities, and some activities announce comment periods and request public input about important draft documents such as the Remedial Work Plan.

All written materials developed for the public will be reviewed and approved by NYSDEC for clarity and accuracy before they are distributed. Notices and fact sheets can be combined at the discretion, and with the approval of, NYSDEC.

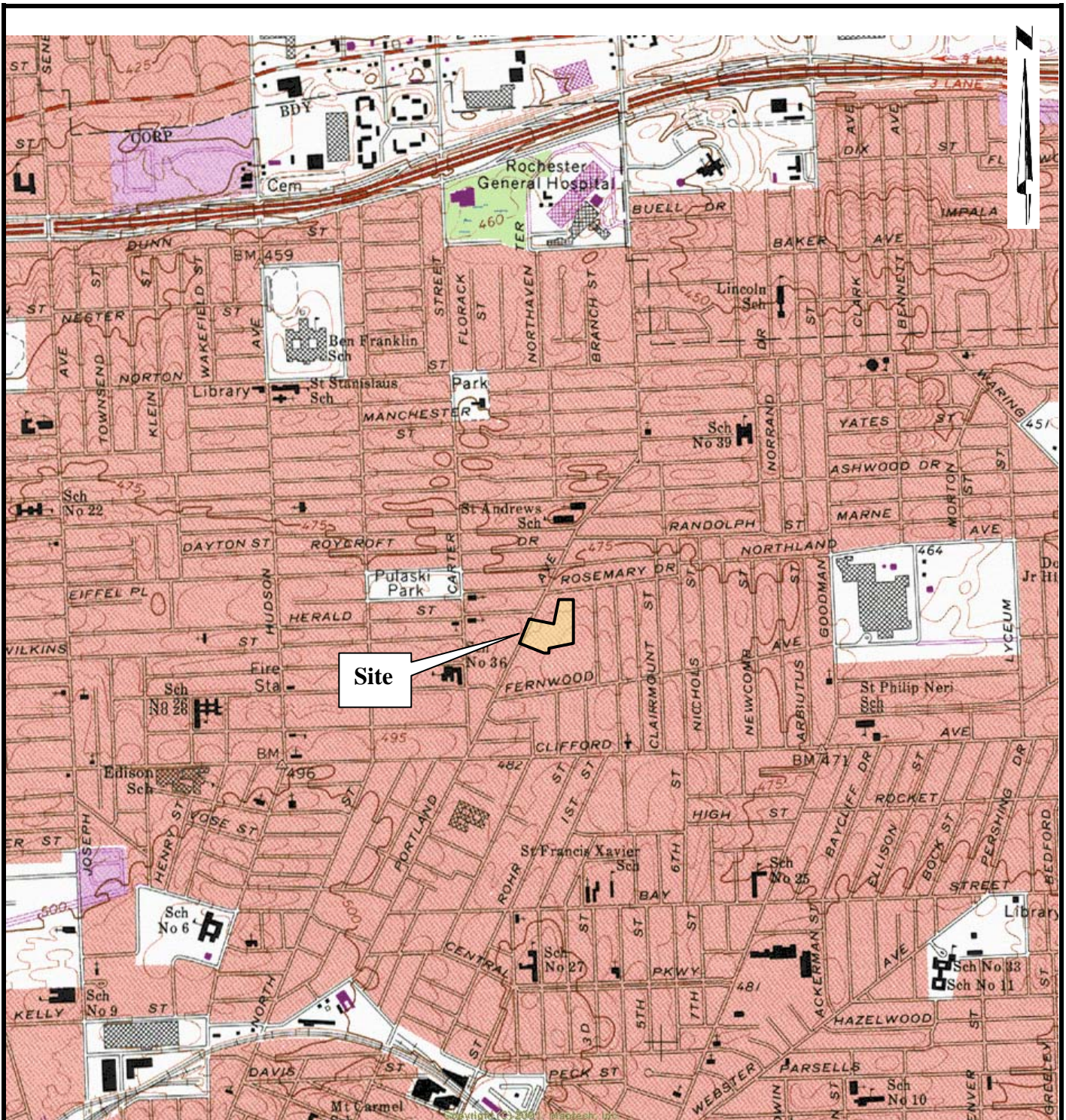
6. Major Issues of Public Concern

This section of the CP Plan identifies major issues of public concern, if any, that relate to the site. Additional major issues of public concern may be identified during the site's remedial process.

The presence of volatile chemicals in contaminated soil or groundwater offers the potential for chemical vapors to migrate through subsurface soils and/or preferential pathways (such as underground utilities) and impact the indoor air quality of area buildings. The accumulation of volatile vapors in impacted structures can result in health concerns associated with high levels of contaminants.

Soils at the site are impacted with volatile chemicals, including some beneath existing structures, therefore there is a possibility of vapor intrusion. A soil vapor investigation, which includes soil vapor sampling and analysis of the site building and nearby residences, is being proposed to determine if soil vapor intrusion is an issue at the site and the potential for off-site exposures.

Appendix A – Site Location Map



Source: Rochester East Quadrangle, USGS



441 South Salina Street, Syracuse, NY 13202-4712
 Main: (315) 471-3920 • www.chacompanies.com

FIGURE 1
SITE LOCATION MAP

JML Optical Site
 678-690 Portland Avenue
 CITY OF ROCHESTER
 MONROE COUNTY, STATE OF NEW YORK

Project:
17781

Date: 1/13/09

Drawing Not to
 Scale

Appendix B – Project Contacts and Document Repositories

Project Contacts

For information about the site’s remedial program, the public may contact any of the following project staff:

New York State Department of Environmental Conservation (NYSDEC):

Mr. Gary Bonarski, P.E.
Project Manager
NYSDEC Region 8
Division of Environmental Remediation
6274 East Avon-Lima Road, Avon, NY 14414
(585) 226-5328

Ms. Lisa Lo Maestro Silvestri
Citizen Participation Specialist
NYSDEC Region 8
6274 East Avon-Lima Road, Avon, NY
14414
Telephone: (585) 226-5326

New York State Department of Health (NYSDOH):

Ms. Katherine Comerford
Project Manager
NYSDOH
335 East Main St., Rochester, NY 14604
(585) 423-8156

CHA Project Manager

Mr. Christopher Burns, Ph.D.
Vice President
10800 Midlothian Turnpike
The Winchester Building Suite 303
Richmond, Virginia 23235
(804) 897-3564

JML Optical Industries, Inc.

Mr. Michael E. McCusker
820 Linden Avenue
Rochester, New York 14625
(585) 248-8900

Document Repositories

The document repositories identified below have been established to provide the public with convenient access to important project documents:

Rochester Public Library, Lincoln Branch

Joan Lee, Reference Librarian

851 Joseph Ave., Rochester, NY 14621

Phone: (585) 428-8210

Hours: M: 12-8, T-F: 12-6, S: 10-2

S: closed

NYSDEC Region 8

6274 East Avon-Lima Road, Avon, NY

Attn: Mr. Gary E. Bonarski, P.E.

Phone: (585) 226-5328

Hours: (call for appointment)

Appendix C – Brownfield Site Contact List

For the duration of this project, the following persons may be contacted with any information regarding general project or site specific concerns.

Monroe County Health Department:

Mr. Jeff Kosmala, P.E.
111 Westfall Road
Rochester, NY 14692-8932
Telephone: (585) 753-5470

New York State Assembly:

Mr. David F. Gantt
133rd Assembly District
74 University Avenue
Rochester, NY 14605
(585) 454-3670

New York State Senate:

Mr. Joseph E. Robach
56th Senate District
2300 West Ridge Road
Rochester, NY 14626
(585) 225-3650

United States Senate:

Ms. Kirsten E. Gillibrand
532 Dirksen Senate Office Building
Washington, DC 20510
(202) 224-4451

Mr. Charles E. Schumer
100 State Street, Room 3040
Rochester, NY 14614
(585) 263-5866

United States House of Representatives:

Ms. Louise M. Slaughter
28th District
3120 Federal Building
100 State Street
Rochester, NY 14614
(585) 232-4850

Rochester Mayor's Office

Mr. Robert Duffy, Mayor
City Hall
30 Church Street
Rochester, NY 14614
(585) 428-7045

School and Daycare Administrators for Facilities Near the Site

Paul Montanarello, Principal
City of Rochester School 36 – Henry W. Longfellow (Pre-K through Grade 6)
85 Saint Jacob Street, Rochester, NY
(585) 342-7270

Note: Henry W. Longfellow is located approximately 0.1 miles west of the Site and is the only school within a 0.25-mile radius of the Site. There are no daycare facilities known to be within a 0.5-mile radius of the Site.

Rochester City School Superintendent

Jean-Claude Brizard
131 West Broad Street
Rochester, NY 14614
(585) 262-8100

Suzanne Wheatcraft or Current Director
Education Facilities Health and Safety
131 West Broad St.
Rochester, NY 14614

Monroe County Water Authority

Greg Wysocki
475 Norris Drive
Rochester, New York
14610- 0999
(585) 442-2000

City of Rochester Bureau of Water and Lighting

Mr. Michael J. Bushart, P.E.
Senior Engineer
803 West Avenue
Building 2
Rochester, NY 14611
(585) 428-7567

Media

News Director
WROC-TV
201 Humboldt Street
Rochester, NY 14610

Assignment Desk
R News Channel 9
71 Mt Hope Ave
Rochester, NY 14620

Assignment Editor
WHEC-TV 10
191 East Ave
Rochester, NY 14604

Assignment Editor
WHAM-TV 13
Po Box 20555
Rochester, NY 14602-055

News Director
WUHF Fox 31
191 East Ave
Rochester, NY 14604

News Director
Wham-Am
207 Midtown Plaza
Po Box 40400
Rochester, NY 14604

Bud Lowell Or Current- News Director
WXXI-Am
280 State Street
Rochester, NY 14614

Metro Desk
Democrat & Chronicle
55 Exchange Blvd
Rochester, NY 14614-2001

News Editor
City Newspaper
250 N Goodman St
Rochester, NY 14607

Elected Officials
Monroe Co. Officials
City Of Rochester Officials

Gladys Santiago
City Council Office
City Hall Room 301 A
30 Church Street
Rochester, NY 14614-1265

Bill Pritchard
City Council Office
City Hall Room 301 A
30 Church Street
Rochester NY, 14614-1265

Mark Gregor
Div Of Environmental Quality
City Of Rochester
City Hall Room 300b
Rochester, NY 14614

Rochester Fire Chief
Rochester Fire & Rescue Dept
185 Exchange Blvd - Suite 665
Rochester, NY 14614-2277

Office Of The Police Chief
Civic Center Plaza
185 Exchange Blvd
Rochester, NY 14614

Cheryl Dinolfo
Monroe County Clerk
101 County Office Building
39 W Main St
Rochester, NY 14614

Mary Louis Meisenzahl
Monroe County
Emergency Mgt Services & Preparedness
1190 Scottsville Rd., Suite 200
Rochester, NY 14624

Maggie Brooks
Monroe County Executive
County Office Bldg Room 110
39 W Main St
Rochester, NY 14614-1476

Louise Hartshorn
EMC - Monroe County
Po Box 92832
111 Westfall Road
Rochester, NY 14692

Joe Albert
Monroe County Health Dept
Po Box 92832
111 Westfall Rd
Rochester, NY 14692-8932

Net Office
City Hall
30 Church St
Rochester, NY 14614

Daryl Parker Or
Current Director
Net Office
500 Norton Street
Rochester, NY 14621

Agency Officials

Lisa Silvestri
NYSDEC
6274 East Avon Lima Road
Avon, NY 14414-9519

Linda Vera
NYSDEC
6274 East Avon Lima Road
Avon, NY 14414-9519

Bart Putzig
NYSDEC
6274 East Avon Lima Road
Avon, NY 14414-9519

Captain Mike Van Durme
NYSDEC
6274 East Avon Lima Road
Avon, NY 14414-9519

Interested Parties

Kelly Travers Main
Citizens' Environmental Coalition
Western NY Office
33 Central Ave 3rd Floor
Albany, NY 12210

Rob Holmes
Hydro Qual Inc.
1200 Scottsville Rd Building C
Suite 120
Rochester, NY 14624

Current Director
Center For Environment Info Inc
5 St Paul St
Rochester, NY 14604-1314

Current Director
Group 14621 Association
1171 N. Clinton Avenue
Rochester, NY 14621

Appendix D – Identification of Citizen Participation Activities

Required Citizen Participation (CP) Activities	CP Activities Occur at this Point
Application Process:	
<ul style="list-style-type: none"> • Prepare brownfield site contact list (BSCL) • Establish document repositories 	At time of preparation of application to participate in BCP.
<ul style="list-style-type: none"> • Publish notice in Environmental Notice Bulletin (ENB) announcing receipt of application and 30-day comment period 	When NYSDEC determines that BCP application is complete. The 30-day comment period begins on date of publication of notice in ENB. End date of comment period is as stated in ENB notice. Therefore, ENB notice, newspaper notice and notice to the BSCL should be provided to the public at the same time.
After Execution of Brownfield Site Cleanup Agreement:	
<ul style="list-style-type: none"> • Prepare citizen participation (CP) plan 	Draft CP Plan must be submitted within 20 days of entering Brownfield Site Cleanup Agreement. CP Plan must be approved by NYSDEC before distribution.
After Remedial Investigation (RI) Work Plan Received:	
<ul style="list-style-type: none"> • Mail fact sheet to BSCL about proposed RI activities and announcing 30-day public comment period on draft RI Work Plan 	Before NYSDEC approves RI Work Plan. If RI Work Plan is submitted with application, comment periods will be combined and public notice will include fact sheet. 30-day comment period begins/ends as per dates identified in fact sheet.
After RI Completion:	
<ul style="list-style-type: none"> • Mail fact sheet to BSCL describing results of RI 	Before NYSDEC approves RI Report.
After Remedial Work Plan (RWP) Received:	
<ul style="list-style-type: none"> • Mail fact sheet to BSCL about proposed RWP and announcing 45-day comment period • Public meeting by NYSDEC about proposed RWP (if requested by affected community or at discretion of NYSDEC project manager in consultation with other NYSDEC staff as appropriate) 	Before NYSDEC approves RWP. 45-day comment period begins/ends as per dates identified in fact sheet. Public meeting would be held within the 45-day comment period.
After Approval of RWP:	
<ul style="list-style-type: none"> • Mail fact sheet to BSCL summarizing upcoming remedial construction 	Before the start of remedial construction.
After Remedial Action Completed:	
<ul style="list-style-type: none"> • Mail fact sheet to BSCL announcing that remedial construction has been completed • Mail fact sheet to BSCL announcing issuance of Certificate of Completion (COC) 	At the time NYSDEC approves Final Engineering Report. These two fact sheets should be combined when possible if there is not a delay in issuance of the COC.

Appendix E – Brownfield Cleanup Program Process

