



**US Army Corps  
of Engineers®**

Buffalo District

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**Public Involvement Plan**

for the

**Harshaw Chemical Company**  
**Formerly Utilized Sites Remedial Action Program**  
**(FUSRAP) Site**  
**Cleveland, Ohio**

December 2013

U.S. Army Corps of Engineers  
Buffalo District  
Environmental Project Management Team  
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Public Involvement Plan  
Harshaw Chemical Company FUSRAP Site  
Cleveland, Ohio

**TABLE OF CONTENTS**

1.0	Overview .....	1
1.1	Purpose and Intent .....	1
1.2	Plan Content .....	2
2.0	Property Description .....	2
2.1	History .....	2
2.2	Site Description/Location.....	3
2.3	Site Inspections and Cleanup Activities .....	5
3.0	Community Background.....	7
3.1	Community Profile.....	7
3.2	History of Community Involvement .....	8
3.3	Key Community Concerns .....	8
3.4	Response to Community Concerns .....	9
3.5	Summary of Communication Needs .....	10
4.0	Public Involvement Plan .....	10
4.1	Public Involvement Goals and Plan .....	10
4.2	Projected Schedule for Public Involvement Activities .....	15
	References .....	16
	Appendix A - Buffalo District Project Delivery Team .....	A-1
	Appendix B - Federal Elected and Agency Contacts.....	B-1
	Appendix C - State Elected and Agency Contacts.....	C-1
	Appendix D - Local Contacts .....	D-1
	Appendix E - Environmental and Active Citizen Groups .....	E-1
	Appendix F - Property Owners .....	F-1
	Appendix G - Media Contacts .....	G-1
	<u>Newspapers</u> .....	G-1
	<u>Television</u> .....	G-1
	<u>Radio</u> .....	G-2
	Appendix H - Court Reporter and Meeting Locations.....	H-1
	Appendix I - Repository Locations.....	I-1
	Appendix J - Other Local Resources .....	J-1

## **LIST OF ACRONYMS**

AEC	Atomic Energy Commission
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
EPA	Environmental Protection Agency
FUSRAP	Formerly Utilized Sites Remedial Action Program
IA	Investigative Area
MED	Manhattan Engineer District
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
OU	Operable Unit
PIP	Public Involvement Plan
RI	Remedial Investigation
UF <sub>4</sub>	uranium tetrafluoride
UF <sub>6</sub>	uranium hexafluoride
U.S.	United States
USACE	U. S. Army Corps of Engineers

**Public Involvement Plan**  
**Harshaw Chemical Company FUSRAP Site**  
**Cleveland, Ohio**

## **1.0 Overview**

The United States (U.S.) Army Corps of Engineers, Buffalo District, developed this Public Involvement Plan (PIP) to provide a framework for public involvement activities for the Harshaw Chemical Company Formerly Utilized Sites Remedial Action Program (FUSRAP) Site, located in Cleveland, Ohio, and to comply with 40 CFR 300.430(c)(2). FUSRAP was initiated in 1974 to identify, investigate, and if necessary, clean up or control sites throughout the U.S. that were contaminated as a result of activities conducted in support of the Nation's early atomic energy and weapons program. These activities were performed by the Manhattan Engineer District (MED) and its contractors from 1942 through 1946 and the Atomic Energy Commission (AEC) and its contractors from 1947 through 1975. When implementing FUSRAP, the Corps follows the investigation and response framework of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

This PIP defines the scope and focus of the Corps' public participation activities during the development of a feasibility study addendum for groundwater and the development of a proposed plan, which will outline the preferred remedial alternative for the site. This PIP presents an organized, targeted approach for effective communication and positive, beneficial public involvement.

### **1.1 Purpose and Intent**

The purpose of this PIP is to comply with 40 CFR 300.430(c)(2) by highlighting public involvement initiatives and strategies that the Corps is implementing to continuously inform and involve the community during the Corps' progression through the CERCLA process at the Harshaw Chemical Company FUSRAP Site.

Public involvement strategies outlined for the site in this plan are intended to:

- i) Foster trust and credibility through proactive interaction with the public.
- ii) Facilitate open and timely communication between the Corps and the community.
- iii) Encourage public input that could potentially lead to more informed Corps decisions, products, and/or project solutions.
- iv) Inform the public of the history of the site and the potential risks associated with contaminants remaining from historic MED/AEC activities.
- v) Communicate the Corps' limitations with regard to authority, funding, staffing, and schedule, and inform the community that such limitations are not barriers to effective public involvement for the Harshaw Chemical Company FUSRAP Site.

## **1.2 Plan Content**

Along with this overview section, the PIP includes:

- i) Property Description: Provides information pertaining to the history of the site, identifies property location and the surrounding community, identifies potential contaminants on the Harshaw Chemical Company FUSRAP Site, and outlines the Corps' progress on their environmental mission at the site.
- ii) Community Information: Includes a community profile, community perceptions, the history of community involvement for the site, the expressed community concerns, the Corps' response to those concerns, and a summary of the community's expressed communication needs.
- iii) Public Involvement Program: The public involvement program section identifies the Corps' approach/plan for outreach to the community and the public at large for the site.
- iv) References: A list of documents used to develop this plan.
- v) Appendices: Appendices include a list of the Corps' Project Delivery Team; federal, state, and local elected officials; federal and state agency representatives; environmental and active citizen's groups; property owners; media contacts; suggested meeting locations; and Administrative Record File locations.

## **2.0 Property Description**

### **2.1 History**

The project site was initially purchased by the Harshaw, Fuller & Goodwin Company in 1905 from the Canadian Copper Company. Early operations included the manufacture of acetone, hydrofluoric acid, sodium fluoride, ammonium fluoride, and nickel cobalt salts. Columbia University approached the Harshaw Chemical Company in October 1941 regarding experimental production of uranium hexafluoride (UF<sub>6</sub>). Work began towards small-scale production in December 1941 under a contract to the National Bureau of Standards. Production operations for anhydrous hydrofluoric acid, ammonium bifluoride, and boron trifluoride (later known as "Synthane") were underway by 1942.

The MED awarded the primary contract to the Harshaw Chemical Company in September 1942 for the production of uranium tetrafluoride (UF<sub>4</sub>). The Harshaw Chemical Company conducted numerous additional chemical and radiological research and production activities for the MED and for commercial entities. The Atomic Energy Act of 1946 created the AEC to oversee the nation's atomic energy and weapons program. The AEC effectively assumed control of all MED operations on January 1, 1947, and all existing MED contracts were administered by the AEC. Harshaw performed the work in Plant C, or Building G-1, refining uranium yellow cake into other uranium compounds. The Harshaw Chemical Company continued production of uranium

compounds until September 1951 when the production of UF<sub>4</sub> ceased. By May 1953 the UF<sub>4</sub> plant was dismantled and the UF<sub>6</sub> production plant was placed on stand-by.

All operations conducted under government contracts ceased in December 1959. By 1960, the site was decontaminated according to the standards at the time. The Harshaw Chemical Company closed one of the disposal areas located in the southern-most portion of the site in 1980 in accordance with contemporary solid waste landfill regulations. Closure activities included the installation of a drainage system, a two-foot thick layer of clean soil cover, grading and grass seeding of the landfill. Because this landfill was operated by the Harshaw Chemical Company subsequent to AEC work and in conformance with applicable law, it is not being investigated further.

The former Harshaw Chemical Company Site was officially added to FUSRAP in 2001. As mentioned previously, the Corps is required by law to conduct FUSRAP in accordance with CERCLA, as amended, and the NCP.

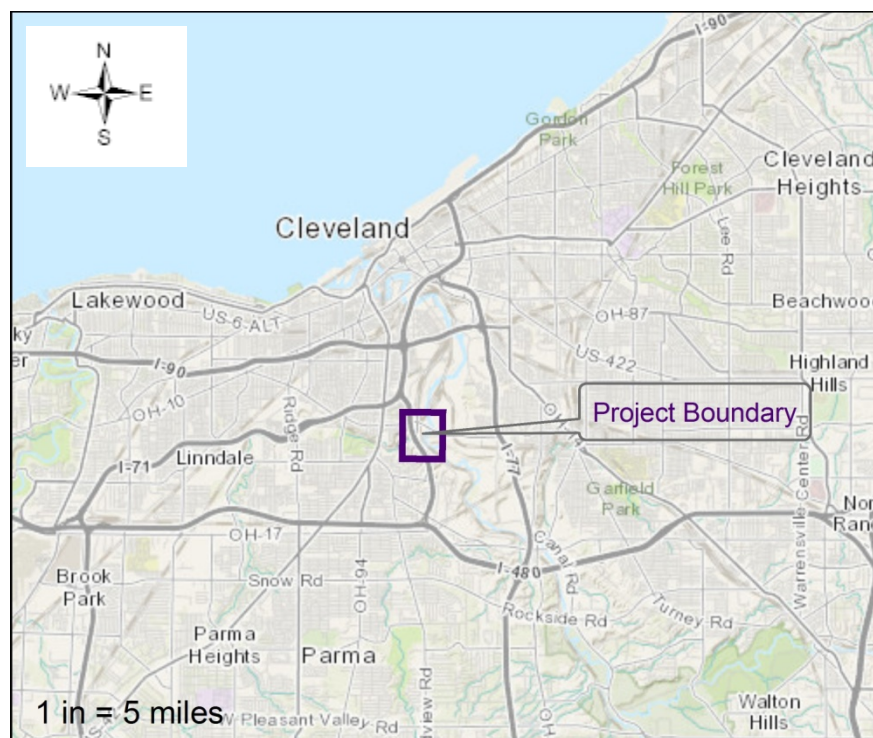
**Table 1: Site History**

<b>YEAR</b>	<b>ACTIVITY</b>
1905	Property purchased by Harshaw, Fuller & Goodwin Company
1941	Experimental production of UF <sub>6</sub> began under the National Bureau of Standards
1942	Production of UF <sub>4</sub> began under contract with the MED
1946	Atomic Energy Act created the AEC
1947	The AEC assumed control of all MED activities
1953	UF <sub>4</sub> plant dismantled and UF <sub>6</sub> production plant on stand-by
1959	Operations for government ceased.
1960	Site decontaminated and released from AEC control
2001	Site added to FUSRAP

## **2.2 Site Description/Location**

The Harshaw Chemical Company FUSRAP Site is a 55-acre industrial facility located at 1000 Harvard Avenue, five miles southwest of downtown Cleveland in Cuyahoga County, Ohio (Figure 1). Although the site is no longer an active chemical facility, portions of the site are being used for commercial purposes. The site is located in a low-lying area adjacent to the Cuyahoga River and Big Creek and is surrounded on three sides by industry. The nearest residential areas are located about one quarter of a mile to the west and south. These residential areas are located at a higher elevation overlooking the Cuyahoga River basin. The Cleveland Municipal School System has an elementary school that is 1.4 miles from the site and a high school that is 2.6 miles from the site. The nearest playground is three miles from the site. There are several recreation and shopping facilities in the neighborhood. The Cleveland MetroParks Zoo and Rainforest is approximately 2.3 miles from the site; the closest hospital is 4.23 miles from the site.

Public Involvement Plan  
Harshaw Chemical Company FUSRAP Site



**Figure 1: Site Location**

Previous industrial use destroyed much of the original ecological habitat on the site. At this time, the Corps does not have any information from the property owners that indicates their future management goals for the site include ecosystem restoration. The Ohio Canal Corridor was working with the property owners on plans to develop portions of the site for a Tow Path Trail along the Cuyahoga River, including park land and possibly a museum. Currently the Tow Path Trail is being routed along Harvard and Jennings Roads. In the future the Ohio Canal Corridor is considering routing an extension of the Tow Path Trail under the Harvard-Dennison Bridge with future plans for development on hold awaiting the outcome of Corps' FUSRAP activities at the site. The Ohio Department of Natural Resources indicated it was unaware of geologic features, breeding or non-breeding animal concentrations, champion trees, or state parks, forests or wildlife areas within a one-mile radius of the site. The site is within the range of the Indiana bat (*Myotis sodalist*), a federally listed endangered species. Portions of the site are within the limit of a 100-year and 500-year floodplain.

Current owners of the site are BASF (formerly Engelhard Corporation), Chevron Environmental Management Company, Chemical Solvents, Inc., E & S Property Managers (c/o C&D Truck and Equipment Services, Inc.), the Northeast Ohio Regional Sewer District, and CSX Transportation.

## **2.3 Site Inspections and Cleanup Activities**

The Corps is the lead federal agency responsible for administering and executing FUSRAP. The Corps' Buffalo District is assigned responsibility for investigating the Harshaw Chemical Company FUSRAP Site. Activities performed by the Corps are described in the following paragraphs and summarized in Table 2.

Although the Corps determined that there was no immediate health risk posed by FUSRAP-related contaminants at the site, the Preliminary Assessment of the former Harshaw Chemical Company Site in 2001 recommended further investigation to characterize the extent of FUSRAP-related contamination and evaluate potential future risks to human health and the environment.

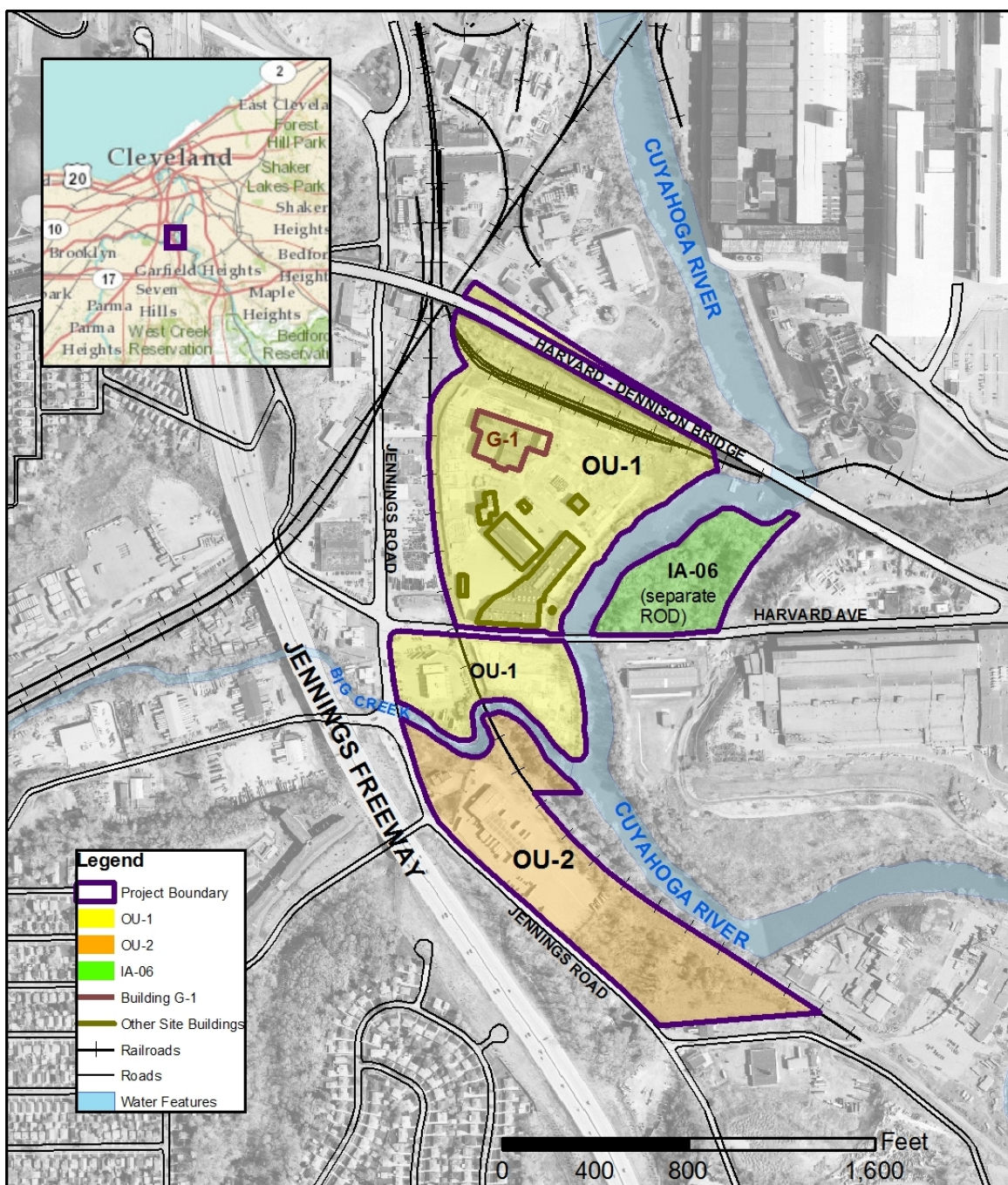
The site was divided into Investigative Areas (IAs) for the Remedial Investigation (RI), which included sampling sediment and surface water in both the Cuyahoga River and Big Creek, the groundwater under the site, the surface soils and subsurface soils on site, and the building structures on the site. In November 2006, the initial RI, which included a Baseline Risk Assessment, was complete. Evidence of varying amounts of contamination resulting from MED/AEC activity at the Harshaw Chemical Company FUSRAP Site was found.

During the development of the RI Report, the Corps identified the presence of another radioactive element (thorium) and obtained additional historical documents which indicated other MED/AEC processes may have taken place at the site. As a result of these findings, the RI Report and the Baseline Risk Assessment were updated and released again in 2009 to address thorium and other potential MED/AEC radiological contaminants of concern.

Based on the site's current use and controls, the levels of radiological contamination found do not pose an immediate risk to human health and/or the environment. However, over a person's lifetime, with 25 to 30 years of daily exposure on the site, there are potential long-term human health risks related to the radiological contamination. Uranium is present above background levels in buildings, soils, sediments, and groundwater, with uranium concentrations highest near Building G-1, the main processing facility. The uranium detected to date indicates the presence of natural uranium – not enriched uranium which confirms project assumptions about the type of materials processed at the site for the MED/AEC.

IA-06, a six-acre parcel located east of the Cuyahoga River (Figure 2), was found to be the least impacted portion of the site. No known process activities were conducted in IA-06; and, results from Corps' investigations concluded that there was no FUSRAP contamination in IA-06 that would pose a risk to human health or the environment. In April 2010 a proposed plan, recommending no further action for the soil in IA-06 was released. A public meeting was held with the community on May 12, 2010, and the comment period for the proposed plan closed May 26, 2010. A record of decision for the IA-06 parcel was signed on March 18, 2011, indicating no further remedial action is required under FUSRAP for the current and reasonably anticipated future land use of IA-06, which is recreational.





**Figure 2: Investigative Area-06 and the Operable Units**

Based on the RI Report and Baseline Risk Assessment, the radioactive constituents of concern on the remainder of the former Harshaw Chemical Company FUSRAP Site are radium-226, thorium-230, thorium-232, and total uranium (U-234, U-235, U-238) for both soil and buildings. The constituent of concern for on-site groundwater is total uranium.

Since future use of the remaining areas will require that the contamination is cleaned up to levels that are protective of human health and the environment, the site moved forward in the CERCLA process to the Feasibility Study phase. To evaluate remedial alternatives in the Feasibility Study, the site was organized into two operable units: OU-1 and OU-2 (Figure 2), which were determined based on planned land uses for these different areas of the site. OU-1 consists of soil, buildings, and groundwater within the site boundary located west of the Cuyahoga River and north of Big Creek. The planned future land use for OU-1 is industrial with the construction worker being defined as the group of individuals reasonably expected to receive the greatest exposure to residual radioactivity. OU-2 consists of soil within the site boundary and is located south of Big Creek and to the west of the Cuyahoga River. The planned future land use for OU-2 is residential with the adult resident being defined as the group of individuals reasonably expected to receive the greatest exposure to residual radioactivity.

The Corps' Buffalo District completed and publicly released the Feasibility Study Report to identify and evaluate potential remedial alternatives to eliminate unacceptable risks to human health and the environment due to the presence of FUSRAP-related contamination in 2012. The Corps monitors site groundwater annually.

**Table 2: Site FUSRAP Activity Timeline**

<b>YEAR</b>	<b>ACTIVITY</b>
1974	FUSRAP initiated
1999	U.S. Department of Energy sends letter to the Corps regarding the potential eligibility of Harshaw Chemical Company Site for FUSRAP
1999	The Corps' Buffalo District begins environmental investigations
2001	The Corps' Preliminary Assessment is complete. Former Harshaw Chemical Company Site is added to FUSRAP
2006	Corps RI Report released
2009	Updated Corps RI Report released
2010	Proposed Plan and Record of Decision released for Investigative Area - 06
2012	Feasibility Study released

## **3.0 Community Background**

### **3.1 Community Profile**

Cleveland is an ethnically diverse city located in Cuyahoga County, Ohio. It is the second largest city in Ohio with the 2012 U.S. Census<sup>1</sup> indicating it has a population of 390,928. The census indicates slightly over half (53%) of the city's population is African American, 10% are Latino or Hispanic in origin and 33% are Caucasian. The median household income (2007-2011) is

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<sup>1</sup> Reference: U.S. Department of Commerce, United States Census Bureau Quick Facts  
<http://quickfacts.census.gov/qfd/states/39/3916000.html>

\$27,470. The former Harshaw Chemical Company FUSRAP Site is located in the southeastern corner of the Brooklyn Centre community.

Cleveland is governed by a Mayor that serves a four-year term and is divided into 19 wards (which will be reduced to 17 wards starting on January 6, 2014). Each ward is represented by a council member that also serves a four-year term. Elections are held for the Mayor one year and then for the council members two years later. The Harshaw Chemical Company FUSRAP Site is within the 15<sup>th</sup> Ward.

### **3.2 History of Community Involvement**

Approximately 50 people attended the Corps' initial project information session for the site in March 2003 at the Cleveland Metroparks' CanalWay Center. Community participants at this meeting were generally aware of the site.

After the RI was complete and the updated report was publicly available, an information session was conducted on January 20, 2010, to update the community regarding the status of the site and the results of the investigation. The meeting, conducted at the Cleveland Metroparks' CanalWay Center, was attended by 73 members of the community.

On April 26, 2010, a proposed plan was released for public comment for the soil in IA-06, a six-acre area associated with an undeveloped parcel located north of Harvard Avenue and east of the Cuyahoga River that was once owned by the Harshaw Chemical Company. A public meeting was conducted with the community on May 12, 2010. The comment period ended May 26, 2010. A record of decision for no further action was signed on March 18, 2011.

An electronic mailing list was developed from the sign-in sheets from the 2010 meetings. The Corps' Buffalo District sends '*News from the Corps*' emails to the participants on this list as new information regarding the site becomes available.

The following sections summarize community concerns and the Corps' public involvement plan actions.

### **3.3 Key Community Concerns**

Based on information gathered through community assessment interviews and input received during meetings, the community expressed concerns regarding:

- Health-related impacts from chemical or radiological contamination from AEC/MED activities at the site.
- Eligibility for the worker's compensation program started by the Department of Energy, researched by the National Institute for Occupational Safety and Health, and administered by the Department of Labor.

- Being kept informed of the timeline for Corps' investigations and activities at the site while being provided with adequate and meaningful opportunities for involvement in the decision-making process.
- The nature and extent of site contamination and the development of cleanup criteria that will be protective of human health and the environment while making the land available for use by the community in an expedient manner.

During the information session held in 2003, concerns were raised about the operable units that the site was divided into and the attendees wanted a further explanation of "no immediate threat." Questions were also asked about investigations being conducted by the Corps' Louisville District regarding the former Cleveland Plant and former Willoughby Plant in Cleveland under the Defense Environmental Restoration Program for Formerly Used Defense Sites.

Public concerns during the 2010 meetings with the community focused on the amount of time it would take for the site to move through the CERCLA process to remediation. Concerns were also expressed regarding health-related complications due to working on the site when it was still an operating facility outside of the years covered by the Energy Employees Occupational Illness Compensation Program.

### **3.4 Response to Community Concerns**

The Corps values the input received from the community and welcomes their continued involvement in the Harshaw Chemical Company FUSRAP Site. The goal of this plan and its implementation is to address the community's information and participation needs to the extent allowed by law and within the agency's resources.

Many of the public concerns identified by the community have been addressed by the Corps as it has progressed through the CERCLA process for the site. Major CERCLA documents are posted to the site webpage<sup>2</sup> upon completion. Electronic and postal mailing list databases are maintained to ensure interested parties receive information in a timely manner. The community is able to provide information or make inquiries electronically through [fusrap@usace.army.mil](mailto:fusrap@usace.army.mil), through a link on the website, by postal mail, or by calling a toll-free number.

The Corps coordinates activities with the property owners, the U.S. Environmental Protection Agency (EPA), the Ohio EPA, the Ohio Department of Health, the Department of Labor, the Department of Labor's Division of Energy Employee Occupational Illness Compensation, and the Ohio Canal Corridor when planning meetings.

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<sup>2</sup> <http://www.lrb.usace.army.mil/Missions/HTRW/FUSRAP/HarshawSite.aspx>

### **3.5 Summary of Communication Needs**

In response to the Corps' outreach efforts, members of the community expressed the type of information they would like to receive and the most effective ways for the Corps to communicate that information. Local residents indicated that they want to be kept informed regarding current and proposed investigations and activities at the site, the impact of these activities on the surrounding community, the potential for development of the Canal Corridor Tow Path Trail, and any potential impacts to health caused by conditions at the site.

The majority of those interviewed through the community assessments prefer to receive information about site activities as it becomes available through either information sessions or newsletters. Responses also indicated that evening was the best time for meetings.

## **4.0 Public Involvement Plan**

### **4.1 Public Involvement Goals and Plan**

The Corps' Buffalo District is committed to informing and involving the public as it moves through the CERCLA process during the investigation and potential cleanup of the former Harshaw Chemical Company FUSRAP Site and has established the following overall goals for the public involvement program. The Corps will:

- Foster and maintain a climate of understanding and trust between the public and the Corps;
- Ensure that the public understands that protection of human health and the environment is the paramount concern during FUSRAP activities at the Harshaw Chemical Company FUSRAP Site;
- Encourage and enable all interested members of the public to be involved and provide input;
- Prepare information and provide opportunities for the public to fully understand, ask questions about, and provide input on the complex technical matters involved in decision-making for the site;
- Listen carefully to what the public expresses;
- Identify and act responsively in regard to public concerns; and
- Allow for flexible planning to enable public comments or concerns to be considered during decision-making and prior to the execution of actions.

The Corps' public involvement goals and needs will be considered and balanced with the project's technical and scientific requirements as well as limitations on funding, staffing, and legal and contracting actions. The Corps developed the following plan to address each concern that was identified as being important to the community.



**Concern 1:** Health-related concerns.

Activity 1: The Corps evaluates risk, but does not determine potential health-related impacts. The Corps will involve representatives of federal and state agencies that do assess health-related impacts in the planning and review process for the site. Representatives from the various agencies will be invited to participate during any public meetings or information sessions.

- **Objective:** Provide agencies with accurate project information so they can assess and convey potential health-related impacts to constituencies.
- **Method:** Representatives from the U.S. EPA, Ohio EPA and Ohio Department of Health are identified in Appendices B and C. Representatives of these agencies are on the Corps' postal and electronic mailing list. Corps staff maintains ongoing interaction with key staff from these agencies.
- **Timing:** The Corps will engage the agencies as necessary to discuss project progress.

**Concern 2:** Eligibility for the worker's compensation program started by the Department of Energy, researched by the National Institute for Occupational Safety and Health, and administered by the Department of Labor.

Activity 2: Inform the Department of Labor of upcoming meetings with the community and offer the opportunity for a representative of the Department of Labor and/or the Department of Labor's Division of Energy Employees Occupational Illness Compensation to attend and be available to provide information to those needing it at the time.

- **Objective:** Provide the public with a resource for information regarding the Energy Employee's Occupational Illness Compensation Program.
- **Method:** Ms. Tina Higginbotham is the contact person for the Portsmouth Resource Center, U.S. Department of Labor, 1200 Gay Street, Portsmouth, OH 45662, (740) 353-6933 or toll free (866) 363-6993 in regard to the worker's compensation program.
- **Timing:** Ms. Higginbotham is aware of the former Harshaw Chemical Company's past activities under the MED and AEC. Calls to the Corps regarding this program will be referred to Ms. Higginbotham as they are received.

**Concern 3:** Being kept informed of the timeline for Corps' investigations and activities at the site while being provided with adequate and meaningful opportunities for involvement in the decision-making process.

Activity 3A: Designate an Outreach Program Specialist

- **Objective:** Provide a primary liaison between the community and the Corps, and to ensure prompt, accurate, and consistent responses and information dissemination about the site. In those instances where the Corps' Outreach Program Specialist may be unable to provide adequate information (such as on technical matters), inquiries will be directed to the appropriate contact.
- **Method:** Ms. Arleen Kreusch serves as a point of contact for community members.
- **Timing:** Ms. Kreusch was designated as the Outreach Program Specialist for the site on December 12, 2006.

Public Involvement Plan  
Harshaw Chemical Company FUSRAP Site

Activity 3B: Provide a toll-free “800 number” and an e-mail address for the community to contact the Corps.

- **Objective:** Enable citizens to receive the latest information available when they want it rather than having to wait for a meeting or a fact sheet.
- **Method:** The toll-free number and e-mail address will be included in any news releases, fact sheets and advertisements made that pertain to the site.
- **Timing:** Both the toll-free line, 1-800-833-6390 option 4, and the e-mail address, [fusrap@usace.army.mil](mailto:fusrap@usace.army.mil), are currently operational.

Activity 3C: Maintain a public website for the Harshaw Chemical Company FUSRAP Site

- **Objective:** Provide a source for factual information regarding Corps activities at the site.
- **Method:** The Internet address is:  
<http://www.lrb.usace.army.mil/Missions/HTRW/FUSRAP/HarshawSite.aspx>
- **Timing:** The website is currently available and is periodically updated as new information becomes available.

Activity 3D: Maintain a postal and an electronic mailing database for the site.

- **Objective:** Facilitate the distribution of new site-specific information to everyone who needs or wants to be kept informed about the site.
- **Method:** The Corps established the electronic and postal mailing lists from information gathered during community interviews and public information session sign-in sheets. To be added to either list, please submit a request to [fusrap@usace.army.mil](mailto:fusrap@usace.army.mil).
- **Timing:** The mailing lists will be reviewed and revised periodically.

Activity 3E: Establish and maintain the Administrative Record File for the site.

- **Objective:** Provide a convenient location to read and copy official documents and other pertinent information about the site and Corps activities. The Administrative Record File is a repository for documents, resources, etc. used by the Corps’ Project Delivery Team in reaching decisions about the site.
- **Method:** An electronic and paper copy version of the Administrative Record File for the site is available at the Cleveland Public Library located at 325 Superior Avenue, N.E., Cleveland, OH 44114. An electronic and paper copy of the Administrative Record File is also available for viewing by appointment in the U.S. Army Corps of Engineers, Buffalo District Office, 1776 Niagara Street, Buffalo, NY 14207. The Cayuhoga County Public Library, Brooklyn Branch, 4480 Ridge Road, Brooklyn, Ohio 44144 has an electronic version of the Administrative Record File.
- **Timing:** The Administrative Record File is established and available in the libraries listed above.

Activity 3F: “Beyond the Headlines” website postings

- **Objective:** Correct factual errors or omissions in media reports on Corps projects.
- **Method:** A “Beyond the Headlines” section will be created in the News section of the Corps website for the Harshaw Chemical Company FUSRAP Site at:  
<http://www.lrb.usace.army.mil/Missions/HTRW/FUSRAP/HarshawSite.aspx>

- **Timing:** “Beyond the Headlines” postings will be added to the website as necessary.

Activity 3G: “*News from the Corps*” emails will be sent to interested individuals to announce new project information.

- **Objective:** Provide a method of quick dissemination of accurate new information.
- **Method:** “News from the Corps” emails.
- **Timing:** Emails will be sent as new information becomes available. These notices are posted on the public website for those not on the electronic distribution list.

Activity 3H: Prepare and distribute site fact sheets, technical summaries and newsletters.

- **Objective:** Provide citizens with current, accurate, easy-to-read, easy-to-understand information about the Harshaw Chemical Company FUSRAP Site.
- **Method:** Fact sheets and technical summaries will be made available on the web. Newsletters will be mailed to all parties on the site mailing list.
- **Timing:** The Corps will continue to prepare and distribute fact sheets, technical summaries and newsletters as necessary.

Activity 3I: Social media

- **Objective:** Expand the dissemination of information beyond those that have expressed an interest in the site in the local community.
- **Method:** Twitter, Facebook, Flickr, YouTube, and Pinterest will be used when pertinent.
- **Timing:** The Corps will explore using social media for the Harshaw Chemical Company FUSRAP Site as the opportunity presents itself.

Activity 3J: Information Sessions

- **Objective:** Provide the public with the opportunity to learn what contamination is on the site, how future land-use considerations will be taken into account when determining risks, and how the Corps will establish a cleanup criteria if remediation is required.
- **Method:** Information sessions will be conducted at the Cleveland Metroparks’ CanalWay Center, 4524 East 49<sup>th</sup> Street in Cuyahoga Heights, Ohio. Meetings will be announced a minimum of two weeks in advance. The Corps will schedule and prepare for all announced meetings. The Corps’ Project Manager, Project Engineer, Outreach Program Specialist, and other appropriate staff will attend.
- **Timing:** As necessary.

Activity 3K: Public meeting regarding the Proposed Plan.

- **Objective:** Receive comments from the community regarding the preferred alternative for the Harshaw Chemical Company FUSRAP Site.
- **Method:** In addition to the information provided in the Method for 3J, a court recorder will be available to capture comments from the community.
- **Timing:** A public meeting is required during the Proposed Plan comment period.



Activity 3L: Solicit comments during a public comment period.

- **Objective:** Provide meaningful involvement in the process by providing an opportunity to review and comment on any Proposed Plans for the site. This also provides the Site Project Delivery Team with valuable information for use in making decisions.
- **Method:** The Corps will announce each comment period separately. Announcements will appear in local newspapers. The announcements will include information on the duration of the comment period, how to submit comments, where to submit comments, etc. The Corps will solicit comments for any Proposed Plans.
- **Timing:** Comment periods will be announced as appropriate. A comment period is required in conjunction with the release of any Proposed Plan and will last a minimum of 30 days.

Activity 3M: Prepare and issue a Responsiveness Summary for the comments received during the release of any Proposed Plans with the Record of Decision.

- **Objective:** Summarize comments received during comment periods, to document how the Corps has considered those comments during the decision-making process, and to provide responses to major comments.
- **Method:** The Corps will prepare a Responsiveness Summary as a section of the Record of Decision. Both technical and non-technical information will be conveyed in a manner that is easily understood.
- **Timing:** The Corps will issue the Responsiveness Summary as part of the Record of Decision.

Activity 3N: Issue the Public Involvement Plan and revise it as necessary

- **Objective:** To identify and address community needs, or concerns regarding the site or the cleanup remedy.
- **Method:** The Public Involvement Plan will be placed in the Administrative Record File. The plan will be revised as necessary based on input.
- **Timing:** The Corps will update the Public Involvement Plan after each major phase of the CERCLA process is completed.

**Concern 4:** The nature and extent of site contamination and the development of cleanup criteria for the site that will be protective of human health and the environment while making the land available for beneficial use by the community.

Activity 4: Execution of FUSRAP activities at the site following the CERCLA process.

- **Objective:** To provide the public with the opportunity to learn what contamination is on the site, how future land-use considerations will be taken into account when determining risks and how the Corps will establish a cleanup criteria if remediation is required.
- **Method:** Reports will be issued for the major phases of the CERCLA process.
- **Timing:** The schedule for reporting is dependent upon the availability of funding and the allocation of resources. Results of groundwater monitoring on the site are placed on the Corps' public website annually.

## 4.2 Projected Schedule for Public Involvement Activities

ACTIVITY	TIMEFRAME
1A Designate U.S. Environmental Protection Agency, Ohio Environmental Protection Agency, and Ohio Department of Health Representatives	Complete
2A Designate U.S. Department of Labor Energy Employees Occupational Illness Compensation Program Representative	Complete
3A Designate Corps Outreach Program Specialist	Complete
3B Provide a toll-free “800 number” and e-mail address for the community to contact the Corps	Currently in operation
3C Maintain a public website	Ongoing
3D Maintain an electronic and postal mailing list for the site	Ongoing
3E Establish and maintain the site Administrative Record File	Ongoing (Locations for the Administrative Record File are listed in Appendix I)
3F “Beyond the Headlines” website postings	As needed
3G “ <i>News from the Corps</i> ” emails	As needed
3H Prepare and distribute site fact sheets, technical summaries and newsletters	As needed
3I Social media	As needed
3J Information sessions	As needed
3K Public meetings	Within the public comment period for the Proposed Plan
3L Solicit comments during a Public Comment Period	As needed and required
3M Prepare and issue a Responsiveness Summary	Released as part of the Record of Decision
3N Issue the Public Involvement Plan and revise the plan as necessary	Complete. Will be updated as needed, depending on the phase of the CERCLA process
4 Reports	As developed

## References

EPA 2005, *Superfund Community Involvement Handbook*, April.

U.S. Army Corps of Engineers (USACE) 2012, *Feasibility Study Report Former Harshaw Chemical Company Site*, September.

USACE 2011, EP 200-3-1, *Environmental Quality Public Participation Requirements for Defense Environmental Restoration Program*, September.

USACE 2008, *Formerly Used Defense Sites Program Public Involvement Toolkit*, January.

USACE 2004, ER 200-3-1, *Environmental Quality Formerly Used Defense Sites Program Policy*, Chapter 8, May.

## **Appendix A - Buffalo District Project Delivery Team**

U.S. Army Corps of Engineers  
Buffalo District  
1776 Niagara Street  
Buffalo, New York 14207  
800-833-6390 (Option 4)  
[fusrap@usace.army.mil](mailto:fusrap@usace.army.mil)

Special Projects Team Leader

Project Manager

Project Engineer

Risk Assessor

Health Physicist

Chemist

Hydrologist

Outreach Program Specialist

Regional Technical Specialist

## **Appendix B - Federal Elected and Agency Contacts**

### **U.S. Senate**

Honorable Sherrod Brown, District office: United States Senator; 1301 East Ninth Street, Suite 1710, Cleveland, Ohio 44114; (216) 522-7272; Fax: (216) 522-2239. Washington: United States Senate; 713 Hart Senate Office Building, Washington, DC 20510; (202) 224-2315; Fax: (202) 228-6321.

Honorable Rob Portman, District office: United States Senator; 1240 East Ninth Street, Room 3061, Cleveland, Ohio 44199; (216) 522-7095. Washington: United States Senate; 448 Russell Senate Building, Washington, DC 20510; (202) 224-3353.

### **U.S. House of Representatives**

Honorable Marcia L. Fudge, District office: Representative in Congress; 4834 Richmond Road, Suite 150, Warrensville Heights, Ohio 44128; (216) 522-4900; Fax (216) 522-4908. Washington: 2344 Rayburn House Office Building, Washington, DC 20515; (202) 225-7032; Fax (202) 225-1339.

### **Federal Agency Contacts**

#### **U.S. Department of Labor**

Ms. Jackie Higginbotham, Portsmouth Resource Center, U.S. Department of Labor; 1200 Gay Street, Portsmouth, OH 45662; (740) 353-6993 or Toll free (866) 363-6993; Fax: (740) 353-4707.

#### **U.S. Environmental Protection Agency**

Ms. Brooke Furio, U.S. Environmental Protection Agency, Region-5 Office; 25089 Center Ridge Road, Westlake, Ohio 44145; (440) 250-1700; [furio.brooke@epa.gov](mailto:furio.brooke@epa.gov)

Ms. Carolyn Bury, RCRA Corrective Action Program Manager, U.S. Environment Protection Agency, Region 5; 77 West Jackson Boulevard, Chicago, IL 60604; (312) 353-2013; [McConaghy.christine@Epa.gov](mailto:McConaghy.christine@Epa.gov)

Mr. Eugene Jablonoski, Federal Facilities Section, Superfund Division, USEPA Region 5; 77 West Jackson Boulevard, Chicago, IL 60604-3590; (312) 886-4591; E-mail: [Jablonowski.Eugene@epamail.epa.gov](mailto:Jablonowski.Eugene@epamail.epa.gov)

Mr. Michael Murphy, Air and Radiation Division, USEPA Region 5; 77 West Jackson Boulevard, Chicago, IL 60604-3590; (312) 353-6686.

## **Appendix C - State Elected and Agency Contacts**

### **Ohio Elected State Officials**

Honorable John R. Kasich, Governor of Ohio; Riffe Center, 30th Floor, 77 South High Street, Columbus, OH 43215; (614) 466-3555.

Honorable Shirley A. Smith, Ohio State Senate, District 21 Statehouse; Senate Building; 1 Capitol Square, Ground Floor, Columbus, OH 43215; (614) 466-4857, e-mail: [sd21@maild.sen.state.oh.us](mailto:sd21@maild.sen.state.oh.us)

Honorable Sandra Williams, Ohio House of Representatives, District 11; 77 S. High Street, 10th Floor, Columbus, OH 43215-6111; (614) 466-1414, Fax: (614) 719-0011, e-mail: [district11@ohr.state.oh.us](mailto:district11@ohr.state.oh.us)

### **Ohio State Regulatory Contacts**

#### **Ohio Environmental Protection Agency,**

Mr. Brian Nickel, Division of Environmental Response and Revitalization, Ohio Environmental Protection Agency, Southwest District Office; 401 E Fifth Street, Dayton, OH 45402-2911; (937) 285-6468; Fax: (937) 285-6404; Email: [Brian.Nickel@epa.state.oh.us](mailto:Brian.Nickel@epa.state.oh.us)

Mr. Kurt Kollar, Division of Environmental Response and Revitalization, Northeast District Office; Ohio Environmental Protection Agency, 2110 E Aurora Road, Twinsburg, OH 44087; (330) 963-1208; Fax: (330) 487-0769; [kurt.kollar@epa.state.oh.us](mailto:kurt.kollar@epa.state.oh.us)

Ms. Shannon Dettmer, Bureau of Radiation Protection, Ohio Department of Health 246 N High Street, Columbus, OH 43215 (614) 995-0761; (614) 466-0381; Email: [Shannon.Dettmer@odh.ohio.gov](mailto:Shannon.Dettmer@odh.ohio.gov)

## Appendix D - Local Contacts

### Cuyahoga County

County Administration Building  
1219 Ontario Street  
Cleveland, Ohio 44113  
(216) 443-7000

**County Executive:**

Mr. Edward FitzGerald, Cuyahoga County Executive, 1219 Ontario Avenue, Cleveland, OH 44113; (216) 443-7178; [ContactEd@cuyahogacounty.us](mailto:ContactEd@cuyahogacounty.us)

**County Planning Commission:** Mr. Paul Alsenas, Principal Planner; 323 Lakeside Avenue West, Suite 400, Cleveland, OH 44113-1080; (216) 443-3700; Fax: (216) 443-3737; E-mail: [cpc@planning.co.cuyahoga.oh.us](mailto:cpc@planning.co.cuyahoga.oh.us)

**County Engineer:** Mr. Douglas Dillon, P.E., P.S., County Engineer; 2100 Superior Viaduct, Cleveland, OH 44113; (216) 348-3800; Fax: (216) 348-3896.

**County Fiscal Officer:** Wade Steen, Cuyahoga County Fiscal Officer; 1219 Ontario Avenue, Cleveland, OH 44113; (216) 443-6914; [wsteen@cuyahogacounty.us](mailto:wsteen@cuyahogacounty.us)

**County Department of Development:** Mr. Larry Benders, Director of Department, 1701 East 12<sup>th</sup> Street, Cleveland, OH 44114-1020; (216) 443-7260; Fax: (216) 348-4477; E-mail: [l.benders@cuyahogacounty.us](mailto:l.benders@cuyahogacounty.us)

### City of Cleveland

Cleveland City Hall  
601 Lakeside Avenue North East  
Cleveland, Ohio 44114

**Mayor:** Frank G. Jackson, Room 202, (216) 664-3990, Fax: (216) 420-7700.

**City Law Department:** Ms. Barbara Langhenry, Interim Director of Law, Department of Law (216) 664-4190.

**City Planning Commission:** Robert Brown, Room 501, 216-664-2210; Fax: (216) 664-3281.

**Department of Economic Development:** Ms. Tracey Nichols, Director, Room 210, (216) 664-2406; Fax: (216) 664-3681.

**Cleveland City Council:** Tony Zajac, Executive Assistant, Room 220, 216-664-4233, Fax: 216-664-3837; Email: [council12@clevelandcitycouncil.org](mailto:council12@clevelandcitycouncil.org)

**City Councilman (Ward 12):** Anthony Brancatelli, Room 220, (216) 664-4233; Email: [council12@clevelandcitycouncil.org](mailto:council12@clevelandcitycouncil.org)

## Appendix E - Environmental and Active Citizen Groups

**Cuyahoga Valley Scenic Railroad:** Craig Tallman, President, Cuyahoga Valley Scenic Railroad; P.O. Box 158, Peninsula, OH 44264-0158; (330) 657-1900; (800) 468-4070; e-mail: [president@cvsr.com](mailto:president@cvsr.com)

**Cuyahoga Valley National Park:** Mary Pat Doorley, Operations Supervisor, National Park Service, Cuyahoga Valley National Park; Park Headquarters, 15610 Vaughn Road, Brecksville, OH 44141; (440) 546-5995; Fax: (440) 717-3795; E-mail: [marypat\\_doorley@nps.gov](mailto:marypat_doorley@nps.gov)

**Earth Day Coalition:** Scott Sanders, Executive Director, Earth Day Coalition; 3606 Bridge Avenue, Suite 4, Cleveland, OH 44113-3314; (216) 281-6468; Fax: (216) 281-5112; E-mail: [ssanders@earthdaycoalition.org](mailto:ssanders@earthdaycoalition.org)

**Environment Ohio:** Alaina McCleery, Citizen Outreach Director, Environment Ohio; 203 East Broad Street, Suite 3, Columbus, OH 43215, (614) 460-8732.

**Friends of Big Creek:** Mary Ellen Stasek, Chair, Friends of Big Creek, P.O. Box 609272, Cleveland, Ohio 44109; (216) 661-7706 E-mail: [mestasek@friendsofbigcreek.org](mailto:mestasek@friendsofbigcreek.org)

**Ohio Canal Corridor:** Tim Donovan, Director, Ohio Canal Corridor, P.O. Box 609420, Cleveland, OH 44109 (216) 520-1825; Fax: (216) 520-1833; E-mail: [tdonovan@ohiocanal.org](mailto:tdonovan@ohiocanal.org)



## **Appendix F - Property Owners**

Mr. Vernon Burrows, BASF Corporation; 100 Park Avenue, Florham Park, NJ 07932; (732) 205-5000.

Ms. Nancy Martin, BASF Corporation; 100 Park Avenue, Florham Park, NJ 07932.

Mr. Mark Stella, Chevron Environmental Management Company; 4800 Fournace Place, E530A, Bellaire, TX 77401-2324; (713) 432-2643.

Mr. Mark Adkins, CSX Transportation; 500 West Street, SC J180, Jacksonville, FL 32202.

Mr. Jerry Schill, Vice President of Operations, Chemical Solvents, Inc.; 3751 Jennings Road, Cleveland, OH 44109; (216) 741-9310.

Mr. Stanley V. Czworkowski, President, E&S Property Managers, c/o C&D Truck and Equipment Service, Inc.; 4015 Jennings Road, Cleveland, OH 44109; (216) 441-3547.

Mr. Lawrence English, Assistant General Counsel, Northeast Ohio Regional Sewer District; 3900 Euclid Avenue, Cleveland, OH 44115-2504; (216) 881-6600.

## Appendix G - Media Contacts

### Newspapers

The Cleveland Plain Dealer  
Sun Newspapers  
1801 Superior Avenue  
Cleveland, OH 44114  
Display Advertising: Laurie Myers  
(216) 999-4361; Fax: (216) 999-6356  
E-mail: LMyers@plaind.com

Environmental Reporter: John Mangels  
(216) 999-4842; Fax: (216) 999-6354  
Also, Mike Sangiacomo 216-999-4890, E-mail: [msangiacomo@plaind.com](mailto:msangiacomo@plaind.com)  
General news E-mail: [Cleveland@plaind.com](mailto:Cleveland@plaind.com)  
[www.clevelandlive.com](http://www.clevelandlive.com)

Old Brooklyn News  
2339 Broadview Road  
Cleveland, OH 44109  
Ads and news releases: Sandy Worona  
(216) 459-1000; Fax: (216) 459-0135  
Monthly paper—published 1<sup>st</sup> weekend of month

### Television

WKYC - TV Channel 3 (NBC)  
1333 Lakeside Avenue  
Cleveland, OH 44115  
News Director  
Main Desk: (216) 344-3333;  
News Desk: (216) 344-3300;  
Fax: (216) 344-3314

WEWS – TV/NewsNet 5 (ABC)  
3001 Euclid Avenue  
Cleveland, OH 44115  
News Director  
(216) 431-5555;  
Fax: (216) 431-3666

WJW FOX Channel 8  
5800 S Marginal Road  
Cleveland, OH 44103

News Director 216 578-0700  
(216) 578-0700; Fax: (216) 391-9559  
E-mail: [tips@fox8.com](mailto:tips@fox8.com)

WOIO – Channel 19 (CBS)  
1717 East 12<sup>th</sup> Street  
Cleveland, OH 44114  
News Director: Dan Salmone  
(216) 781-1900 or (877) 929-1943

### **Radio**

WDOK-FM(102.1)  
1041 Huron Road  
Cleveland, OH 44114  
Program Director: Dave Popovich  
Studio: (216) 578-1021;  
Business: (216) 861-0100;  
Email: [info@new102.com](mailto:info@new102.com)

WCPN (90.3) ideastream  
1375 Euclid Avenue  
Cleveland, OH 44115-1835  
Executive Editor: Dave Molpus  
(216) 916-6100 or (877) 399-3307; Fax: (216) 916-6090  
E-mail: [comments@ideastream.org](mailto:comments@ideastream.org)

## Appendix H - Court Reporter and Meeting Locations

**Court Reporter:** Court Reporters of Akron Canton and Cleveland; (330) 666-9800; (330) 452-2400; (216) 621-6969.

**Meeting Location:** Cleveland Metroparks' CanalWay Center, East 49<sup>th</sup> Street Entrance, Cuyahoga Heights, Ohio Reservations: Stacy Allen or JoAnn Kubicki, (216) 206-1000; [canalway@clevelandmetroparks.com](mailto:canalway@clevelandmetroparks.com)

## **Appendix I - Repository Locations**

**Cleveland Public Library (electronic and paper copy)**, Ms. Maureen Mullin, Science and Technology Department, Cleveland Public Library, Public Administration Library; 325 Superior Avenue, N.E., Cleveland, OH 44114; (216) 623-2932.

**Cuyahoga County Public Library, Brooklyn Branch (electronic)**, 4480 Ridge Road, Brooklyn, Ohio 44144.

**U.S. Army Corps of Engineers, Buffalo District (electronic and paper copy)**, 1776 Niagara Street, Buffalo, New York 14207, (800) 833-6390 (option 4); Email: [fusrap@usace.army.mil](mailto:fusrap@usace.army.mil)

## Appendix J - Other Local Resources

**In addition to media, send news releases to:**

Environment Ohio  
692 N High St, Ste. 202  
Columbus, OH 43215  
Phone: (614) 460-8732  
Attn: Ms. Alaina McCleery, Citizen Outreach Director  
E-mail: [amccleery@environmentohio.org](mailto:amccleery@environmentohio.org)  
(614) 460-8732

Earth Day Coalition  
3606 Bridge Avenue, Suite 4  
Cleveland, OH 44113  
Phone: (216) 281-6468  
Attn: Scott Sanders  
E-mail: [ssanders@earthdaycoalition.org](mailto:ssanders@earthdaycoalition.org)  
Fax: (216) 281-5112