

# CITIZEN PARTICIPATION PLAN

For The

## ONONDAGA LAKE NATIONAL PRIORITY LIST SITE

January 1996



■ **New York State Department of Environmental Conservation**

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# CITIZEN PARTICIPATION PLAN

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## 1. Introduction

Onondaga Lake was placed on the National Priorities List (NPL) in December 1994 by the US Environmental Protection Agency (EPA). Through a cooperative agreement with EPA, the New York State Department of Environmental Conservation (DEC) was assigned lead agency authority to administer the Onondaga Lake NPL site enforcement and remedial program. The federal hazardous substance enforcement and remedial program is governed by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980 and by the Superfund Amendments and Reauthorization Act of 1986 (SARA)

Granting project management responsibility to DEC allowed the same remedial management team that has been managing a related Remedial Investigation/Feasibility Study (RI/FS) on sediments in the Lake to fold the historic and ongoing work into the larger context of the NPL site. This was intended to reduce or eliminate duplication of effort or time lags inherent to transfers of project management.

The DEC will implement a comprehensive remedial program for restoring Onondaga Lake following appropriate federal and state laws and regulations. Applicable State guidelines and criteria for hazardous waste remediation are set forth in the State's Inactive Hazardous Waste Disposal Site Remediation Program (6 NYCRR part 375).

Along with accepting lead agency project management status for the Onondaga Lake site, the DEC also assumed the responsibility for citizen participation at the site. Federal and State citizen participation programs are similar in intent and required activities.

This Citizen Participation Plan (CPP) is intended to fulfill all applicable state and federal citizen participation requirements.

The purpose of the Citizen Participation program is to involve the community and other interested individuals and groups in the complete remedial process, from preliminary site investigations through the RI/FS processes and on to the proposed final remedial action plans for the Onondaga Lake NPL site.

The intent of this Plan is to:

- a. promote public understanding of DEC's responsibilities, planning activities and remedial activities at the site and;
- b. provide an opportunity for DEC to learn from the public by seeking and obtaining public input that will assist the DEC in developing a site specific comprehensive remedial program which is protective of both public health and the environment.

This CP plan presents methods that DEC will follow to both inform the public about studies of and findings about the site and involve the public in the remedial process. The plan will be flexible so as to accommodate issues or interests which may be identified as the remedial process proceeds.

## 2.0 Site Information

### 2.1 Area Profile

Onondaga Lake is located along the northern end of the City of Syracuse in Onondaga County. Although in a metropolitan area, most of the land immediately surrounding the lake is under public ownership by Onondaga County and is devoted to parkland. The City of Syracuse owns a small area of shoreline on its boundary and the remainder of the shoreline is privately owned by the following industries: Conrail, Allied Corporation, Crucible, Inc. and Niagara Mohawk Power Corporation. There are no year-round or seasonal residential homes on the lake's shores unlike on most other upstate New York lakes.

Onondaga Lake is relatively small with a surface area of 4.6 square miles and a mean depth of 35 feet and maximum depth of 63 feet. It is about one mile wide and 4.6 miles long. The lake's drainage basin is 248 square miles and includes a variety of land uses such as cropland, urban development, woodlands and specialized uses like orchards and pastures.

Several tributaries flow into the lake, with water from Nine Mile Creek and Onondaga Creek accounting for about 65% of the lake's total inflow. Onondaga Creek flows directly through the City of Syracuse and is one of three

The lake drains northerly into the Seneca River. The Seneca River combines with the Oneida River at the Three Rivers Junction to form the Oswego River which then flows north to the City of Oswego where it empties into Lake Ontario

## 2.2 Site History

Onondaga Lake is part of the national Barge Canal system and lies in a richly historic area of New York State. The first documented human settlement of the area was by the Iroquois Confederacy in the 15th and 16th centuries. Jesuit missionaries and explorers followed prior to the Revolutionary War.

Key factors in the early development of the area around Onondaga Lake were salt, transportation and the post Revolutionary War land grants that brought European settlers to the area.

Explorers discovered salt springs near the Lake's shore in 1654, and commercial salt production began in 1793. Salt production from the springs spurred the development of other related industries needed to support, package and transport the salt. In 1822, the water level of the lake was lowered for various reasons including canal construction, control of disease and the need for increased room for salt lots. With a lowered lake water level, larger areas of salt marsh were exposed for brine extraction. Altogether, this lowering resulted in a 20% reduction of total water surface area and eliminated much of the surrounding wetlands.

By 1850, the salt industry and related transportation systems including the Erie Canal and railroads had led to the growth of Syracuse from a hamlet of 600 people in 1820 to over 25,000 inhabitants. During the 1880's and 90's, Onondaga salt began to lose out to competitors in the west. The last salt works in the area closed in 1926

Although salt production waned, the natural resources in the area and its location as a transportation hub led to the development of other industries at and around the Lake. In 1884, local supplies of brine, limestone, coal, ammonia and water led to the establishment of the Solvay Process Company which produced soda ash. Solvay Process Company later became Allied Chemical Corporation which later became Allied-Signal Inc. Beginning with the soda ash operation, the Company went on to develop other production lines and facilities. These plants included a coke operation begun in 1892, a benzol plant which used the light oil from the coking operation to produce benzol, toluol and xylol products and a chlor-alkali plant at Willis Avenue. In 1953, an additional chlor-alkali plant began operations at Bridge Street in Solvay. These plants produced chlorine and caustic soda by the electrolysis of brine. Use of mercury in this chlor-alkali operation began in 1946.

The list of chemicals produced throughout the diverse and interrelated operations of Allied, over its 100 year history adjacent to the lake's shore, included benzenes, chlorinated benzenes, caustic soda, sodium bicarbonate, chlorine, muriatic acid, ammonium chloride, phenol, and sodium nitrite among others.

Disposal of the waste products from these operations and other industrial plants located near the lake or on its tributaries led to many of the lake's residual pollution problems today.

Various other industries including iron and steel works, pottery, china and machinery plants were built on sites of abandoned salt lands mainly along the southern shoreline and lands to the west of the lake.

As early as 1871, Onondaga Lake was a popular recreation area and by the 1890's the western and northern shores were well developed with resorts

and amusement parks. The lake was a popular place for bathing and fishing in the summer and ice boating and skating in the winter. The resorts led to further expansion of the area's transportation system including additional railroad spurs and use of lake steamers and electric trolleys.

As the population and industries grew, large volumes of sewage and industrial waste were discharged into Onondaga Lake. After World War I, the once thriving resort industry around the Lake began to collapse due largely to the impacts of pollution on the lake and its environs. In 1940, swimming was banned.

In 1960, the County's Metropolitan Sewage Treatment Plant (METRO) was completed and its treatment effectiveness and capacity was upgraded in 1979 and again in 1981.

With the closure of Allied Chemical Corporation's Syracuse operations in 1986, enactment of more stringent federal and state water quality laws and the development of the largest shopping mall - Carousel Center - in this part of the State, the community began to re-focus attention on the Lake and its possible future uses. In addition, the community showed interest and support for park improvements along the shoreline and possible future development of a bike and pedestrian trail system with its hub surrounding the lake.

All of these activities along with the increased interest in the economic benefits of waterfront developments, state and federal programs to remediate hazardous waste sites and opening the lake for catch and release fishing in 1986, have added impetus to lake restoration efforts.

### Site Description

The National Priority List (NPL) site is officially defined as Onondaga Lake, its associated tributaries, and upland hazardous waste/substance sites which have been determined to be releasing or threatening to release a hazardous substance to the Onondaga Lake system. The exact extent of the site cannot be fully defined until all areas of concern are known and identified through the RI/FS process

It is anticipated that the full NPL site will be comprised of many discrete sites or areas of concern which will be called "subsites.

### Problems Identified at the Site

Significant pollution problems have existed in Onondaga Lake for decades. The pollution has been from both industrial and municipal sources and has been the focus of much public and private official discussion over the years. Most residents in the Syracuse area know something about the lake's pollution history and are aware of its limited uses. A Public Health Assessment prepared as a requirement of the NPL listing by the New York State Department of Health in 1994 confirmed what had been acknowledged for some time that the Lake is a public health hazard. This finding was based primarily on the dangers of consuming fish from the lake and the potential exposure to harmful bacteria during recreational water contact, particularly swimming. Prior awareness of these hazards led to a ban on swimming in 1940 and a complete ban on fishing in 1970.

In 1986, the lake was opened to fishing on a catch and release basis with a State Health Department advisory against eating any fish from the lake. Signs indicating the advisory are posted on the lake's shore.

The lake's present condition is the result of more than a century of domestic and industrial pollution. Today, the lake's problems include the presence and threats of hazardous substances in and around the lake, elevated bacteria levels from raw sewage released into the lake via combined sewer overflows, reduced oxygen levels associated with abundant algae growth, high turbidity, high salinity and elevated ammonia levels.

Most of the known problems with the lake are related to past industrial operations and discharges, remaining impacts or threats from the hazardous substance sites, releases from the combined sewer overflows, (CSO's), and the large inflow of treated sewage effluent from the METRO plant.

#### Hazardous Substances

Hazardous substances of concern in and around the lake include mercury, chlorobenzene, chlorides, PCB's, benzene, toluene, xylene, naphthalene and heavy metals. Additionally calcium carbonate and ammonia are known to be impacting the lake.

#### Mercury and Alkali Wastes

The lake bottom was originally included on the State's Registry of Inactive Hazardous Waste Sites because of significant levels of mercury contamination in the lake's sediments.

The Allied Signal chlor-alkali facility discharged an estimated 165,000 pounds of mercury into Onondaga Lake from 1946 to 1970. Although mercury loading to the lake was greatly reduced during the period between 1970 and 1988, an estimated 7 million cubic yards of the lake sediments remain contaminated.

Studies of mercury concentrations in the lake's ecosystem are underway. Mercury was first detected at dangerous levels in fish from the lake in 1970 and as a result, fishing was banned. The exact source of mercury contamination in the fish is still under investigation

During its hundred years of soda ash production, Allied deposited alkali waste onto nearly 1500 acres of land around Onondaga Lake. These waste beds remain a continuing source of salty input to the lake through erosion, surface runoff and groundwater leaching. Prior to its closure, Allied discharged approximately 6 million pounds of salty waste daily into Onondaga Lake from its soda ash facility. The waste is mainly made up of sodium and calcium chlorides and calcium carbonate. This waste not only contributes to the lake's salinity, but causes the creation of oncolites which limits growth of aquatic plants in the lake's near shore areas thereby eliminating important fish habitat.

Since closure of Allied's Syracuse operations in 1986, the concentration of chloride in the Lake has decreased dramatically, but remain much higher than other lakes in the Central New York area.

#### Other Hazardous Substances

Although mercury remains the contaminant of most concern because of its extent and persistence in the fish and lake bottom, other toxic substances have also been detected in the lake's ecosystem. PCB's and chlorobenzenes are among the toxic substances identified in the lake system.

Additionally, inactive hazardous waste sites located around the lake and investigated through the State's hazardous waste remedial program have contained various contaminants. Many of these sites, including the Tar Beds (Semet Residue

Ponds) and Willis Ave. site, will continue to be investigated and the results folded into the NPL process.

### Sewage and Combined Sewer Overflows

The Onondaga County Metropolitan Syracuse Treatment Plant (METRO) discharges treated domestic and industrial wastes into Onondaga Lake. Due to the plant's design and size limitations, it releases ammonia and phosphorus to the lake in quantities which contribute to water quality problems.

Phosphorus and nitrogen inputs from METRO and other sources stimulate the excessive growth of algae in the lake. This growth and its subsequent decay decreases the lake's water clarity and eventually causes the loss of oxygen in the lake's bottom waters. In 1990, METRO contributed 58% of the total phosphorus loading to Onondaga Lake. The remaining 42% entered via the lake's tributaries. Nitrogen in the form of ammonia is discharged into the lake from METRO and other sources in amounts that can be harmful to fish. Metro contributes about 90% of the ammonia loading to the Lake with smaller amounts coming from the wastebeds and tributary streams.

During storm periods, a mixture of raw sewage and street runoff overflows from the sewage system's combined sewers releasing potentially harmful bacteria to several of the lake's tributaries and from there to the lake. There are 45 CSO's that discharge into Onondaga Creek, 19 discharging into Harbor Brook and 2 into Ley Creek.

Public health standards for levels of indicator bacteria are routinely violated throughout the southern half of Onondaga Lake following storm events.

### Other Problems

**Mud Boils** - The mud boils are small eruptions or discharges of mud and soft sediment from underground. An extensive area of mud boils exist in the Tully Valley some 18 miles south of Onondaga Lake. Discharges from the mud boils contribute to high concentrations of clay and salt in Onondaga Creek and from there to Onondaga Lake. The sediments contribute to the turbidity of the creek and lake and deposition of the sediments greatly limit fish spawning areas and other bottom life in the creek and lake. Efforts to control the mud boil releases are underway.

**Salinity** - As previously mentioned, the discharge of salty wastes from Allied's soda ash production had major impacts on increasing the chloride concentration of the lake. The lake's elevated salinity also negatively impacted the diversity of aquatic life.

An additional impact of the salty waste on the Lake is the alteration of the Lake's natural stratification. Because salty water is more dense than freshwater, high salt loadings alter the natural stratification cycle of the lake. This alteration disrupts the seasonal turnovers of the lake's waters and in turn can lead to reduction of oxygen levels. The Seneca River also experiences chemical stratification as a result of receiving denser, salty water from the lake. This stratification in turn leads to lowered oxygen levels in the river.

## 3.0 Project Description

### Objectives of Remedial Investigation/Feasibility Study (RI/FS)

The primary objectives of the RI/FS are to determine the nature and extent of hazardous substances at the Onondaga Lake site and to develop and evaluate remedial alternatives as warranted. The ultimate goal of the RI/FS is to select a remedy or remedies which, once implemented, will adequately mitigate identified threats and otherwise be protective of public health, welfare and the environment. The RI/FS will be conducted in a manner that is consistent with the Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA, USEPA, 1988, Interim Final; the National Contingency Plan; and relevant DEC guidance.

### Approach

Because of the Onondaga Lake NPL site's large size and complexity, the basic approach that will be used for its remediation will be to divide the site into manageable units which can be addressed and remediated on a focused basis. The units will be determined by virtue of their physical nature, geographic separation, specific contaminants, specific production facility, potentially responsible party (PRP), etc. and will be designated as "subsites." Each subsite remedial program will consist of a Remedial Investigation/Feasibility Study (RI/FS), a Proposed Plan which identifies the preferred remedy and the basis for that preference and a Record of Decision (ROD) selecting a remedy for the subsite. These activities will then be followed by a remedial design and a remedial action for each subsite as appropriate.

Once the last subsite ROD is issued, the comprehensive RI/FS for the NPL site can be completed. However, it must be ensured that the sum of the various subsite RI/FSs and corresponding RODs result in the remediation of Onondaga Lake.

Having determined this, the comprehensive RI/FS and its ROD will essentially be a summarizing document describing and demonstrating how, with the remediation of all of the subsites, the threats to human health and welfare and the environment have been mitigated.

The site is comprised of Onondaga Lake itself, a number of state-listed inactive hazardous waste sites, and other areas of concern (AOC) which need to be investigated and evaluated. Some of these sites and AOCs are located along the lake's shore, while a number of them are located along the lake's tributaries. A number of these sites have ongoing remedial programs which commenced prior to the Lake's NPL listing. In order to avoid duplication and delay, and to ensure that individual subsite remedies are compatible and consistent with other subsite remedies and the overall NPL site remedial strategy, a basic component of the overall remedial program for the Onondaga Lake NPL site is to coordinate and to integrate the past and ongoing remedial work at subsites with any future remedial work at other subsites.

As the various subsite remedial programs progress, the resultant data and information will be integrated and coordinated into a database. This will enable a determination if any data gaps or other informational needs exist which will need to be addressed. To assist with the needed data and information integration, a special Analytical and Informational database and a Geographic Information System (GIS) is being developed. The data gathered from the various subsites will serve as input to the database in a way that can be readily accessed for use in the remediation of other subsites and/or the entire NPL site.

Another key element of the remedial program is the possible implementation of Interim Remedial Measures (IRMs) at subsites. Such measures can eliminate or reduce release of contaminants prior to completion of the entire RI/FS process and

determination of a final remedy for the site. An IRM will be considered when it is determined that there is an imminent and substantial endangerment to the public health or welfare or the environment because of actual or threatened release of a hazardous substance from a subsite.

### 3.3 Site Determination and Evaluation

Determination, in part, of the geographic extent of the NPL site will be based upon the review of information provided to the State and EPA by companies responding to request for information letters pursuant to CERCLA §104(e). The letters request information relating to a facilities' processes, waste streams, disposal practices, data reports, investigations, etc. Review of responses to these requests and other available information will assist the State and EPA in determining the facilities and areas for which remedial programs are warranted. Reports will be generated which will summarize the significant factors which led the State and EPA to consider an area to be a subsite.

Subsites will be identified by evaluating existing data to determine if there was or is presently a release of hazardous substances from the subsite into the lake system or if there is a threat of such a release. Once designated as a "subsite", these subsites will then be investigated in accordance with CERCLA, the National Contingency Plan (NCP) and pertinent DEC guidance. The subsite investigation will proceed through the feasibility study phase to a Record of Decision for the given subsite.

There are areas in the vicinity of the lake system that are presently known to contain hazardous substances, but it is not known whether these areas are threatening or releasing contaminants into the lake system. These areas will likely undergo a Preliminary Site Assessment (PSA) in order to determine the

significance of any on-site contamination to public health or the lake system's environment. A PSA usually consists of three steps which include a records search, sampling and surveys and groundwater monitoring. Once an area is determined to be releasing or threatening to release a hazardous substance to the lake system, the area will be considered a subsite and a full RI/FS will be performed. During the RI, some subsites may be found to have significant sources of contamination to the lake system. In some cases, it may be feasible, for an IRM to be developed and implemented to cut off or reduce release of contaminants on a more immediate basis prior to the completion of the subsite's full RI/FS.

The primary enforcement tool which will govern the performance of the subsite PSAs and RI/FS s will be a consent order between DEC and the respective potentially responsible party (PRP). Where negotiations fail or where there is no viable or known PRP, the PSA and RI/FS will be performed by the DEC.

## 4.0 Citizen Participation Program for Comprehensive NPL RI/FS

### 4.1 History of Citizen Participation with Site

Even though the complexity of the lake's pollution problems yield no quick answers for the public, citizens have become interested and involved in Onondaga Lake remediation activities through the public outreach efforts of the various agencies and organizations involved in lake remediation over the years.

Groups involved in past and/or ongoing outreach have included the State Department of Environmental Conservation through its Central and Regional offices, the Onondaga County Environmental Management Council, the Onondaga Lake Advisory Committee, SUNY College of Environmental Science and Forestry, the Metropolitan Development Association, Onondaga County government and the Onondaga Lake Management Conference. Public outreach activities have included sponsorship of conferences, publications, public meetings, press releases, production of educational videos, and displays.

Past and on-going public education and participation activities were considered when formulating this Citizen Participation (CP) Plan. Where appropriate, the public participation efforts for the NPL RI/FS will build on previous efforts. Additionally, this Plan recognizes that the diversity of efforts and agencies may have caused some confusion on the part of the public regarding remedial activities, agencies involved and timelines. Clarification on the purpose of the NPL RI/FS and its relationship to other remedial activities will be one of the objectives of this Plan.

Organized efforts by the State to inform and involve the public in lake remediation began shortly after Allied announced the closure of its Syracuse operation in April of 1985. Immediately, the Regional DEC office went to work compiling a report on environmental issues relating to the closure. In October of 1985, the report titled: The Allied Closure - Environmental Issues was released by the DEC and publicized in the area. A series of meetings was organized and held throughout the community with the public and local officials. At the meetings, the DEC described the report and the regulatory processes involved and solicited public input.

In 1986, the DEC appointed the Onondaga Lake Advisory Committee (OLAC). The Committee's role was to advise and assist state and local governments on programs and policies affecting Onondaga Lake's quality and usage. Initially the 18 member group was the only group concerned with the lake and therefore its meetings became the focal point for community discussions on lake-related matters. Committee members included area residents, local officials, representatives of involved state agencies and environmental and sportsmen's organizations.

OLAC developed and supported such public outreach efforts as establishment of a Speakers Bureau to provide speakers for local civic, social and school groups; sponsorship of an evening adult education course on Onondaga Lake's history and current issues, development of educational video programs on the lake, sponsorship of all-day lake-related conferences; and with the County Parks Department, sponsorship of an annual waterfront celebration bringing thousands to the lake's shore for entertainment and information. Additionally, numerous outreach and informational efforts, including publication of brochures, newsletters, promotional materials and community displays were undertaken related to the remediation and restoration of the Lake.

Regional DEC staff worked closely with the OLAC and brought various proposed state programs such as draft consent orders and possible environmental benefit projects before the Committee for their input.

With the creation of the federally-funded Onondaga Lake Management Conference in 1990 and establishment of a Citizens Advisory Committee specific to the Conference, the State's Advisory Committee became less active with many of its members also serving on the Conference CAC. OLAC continued its public education efforts attempting to not duplicate the efforts of others and last met in 1993.

Over the years, DEC has worked directly with interested area residents, local officials, and Management Conference members to provide information about on-going activities involving lake studies and remedial efforts. Activities supported by DEC include but are not limited to, all public outreach activities of the OLAC; public meetings and receipt of public comment on remedial activities at individual hazardous waste sites; maintenance of mailing lists and document repositories; maintenance of the Speaker's Bureau concept begun in concert with the Advisory Committee; provision of information to area school, civic groups and other organizations; and regular production and distribution of educational and informational material. DEC has also issued press releases on lake related remedial activities including finalization of consent orders and in some cases, held press conferences.

In 1992, a public meeting and 30 day comment period was held by DEC and the State Attorney General's office to explain and answer questions on the proposed consent decree with Allied regarding the RI/FS for the lake sediments.

### Citizen Participation Plan Objectives

The Citizen Participation Plan for the Onondaga Lake NPL site is designed to meet the following objectives:

- a. Inform and educate the public regarding the Comprehensive RI/FS project and its constituent subsite projects.
- b. Clarify the purpose, process and role of the RI/FS and its relationship to other lake restoration activities in which the federal, state or local governments may be involved.
- c. Solicit and obtain valuable input and involvement from the community in the RI/FS decision-making process
- d. Identify and respond to issues, problems and concerns of the public relating to the NPL RI/FS project.
- e. Inform the public about the federal Superfund process.

### Proposed Citizen Participation

#### A. Overview

The citizen participation (CP) activities for the Comprehensive NPL RI/FS will consist of two major parts:

- a. those CP activities related to the overall RI/FS and

b. those CP activities related to the investigation and remediation of individual subsites.

The overall comprehensive RI/FS refers to the one process which will be an incorporation of all of the RI/FS documents for each subsite. As described in Section 3.0, the final Record of Decision will be a summary document describing the sum of the respective subsite remedial programs

In light of the unique nature of this project, the CP Plan needs to be flexible and will probably be as unique as the RI/FS project itself.

Development and implementation of this CP Plan is based on the following considerations which either separately or in combination are unique to this project:

1 The high level of public awareness of the lake due to previous efforts to inform, educate and involve the public in lake issues especially since 1986;

Therefore : this plan attempts to build on previous citizen participation efforts including mailing lists, informational materials and contacts.

2. The diversity and number of governmental agencies and local groups involved in lake-related activities and carrying out on-going citizen participation efforts in one form or another.

**Therefore** : the Plan emphasizes the importance of continuing communications with other entities working on lake-related projects, attempts to coordinate overall schedules to avoid action or meeting conflicts, and recognizes the importance of reciprocating by keeping other lake-related groups informed of the RI/FS process.

3. The existing level of public misunderstanding or confusion on the facts about lake issues due to the number of groups involved, their sometimes conflicting statements, and the long history of raised expectations for lake cleanup.

**Therefore** : the State will stay aware of lake-related activities of others, and help clarify for the public the distinct roles of each involved agency in the lake's restoration. If appropriate, some citizen participation activities could be accomplished jointly by involved agencies or groups.

4. One concurrent activity involving the State which may confuse the public with the State NPL site process is the Natural Resources Damages suit. The plan to determine how to assess the damages is due in early 1996.

**Therefore**: the State will clarify through various public means the role of the NRD action vis a vis the NPL process. There are certain citizen participation activities which are required under CERCLA and the Oil Pollution Act (OPA) for Natural Resource Damage efforts. The State plans to integrate NRD-specific CP activities into the overall NPL site CP activities. It may be both necessary and

desirable for some public presentations to incorporate information and seek input for both actions with clarification on their distinctions. For example, fact sheets on the NRD may be distributed at NPL site and subsite meetings.

5. Due to the numerous potential subsites, a schedule for CP activities is difficult to compile.

Therefore: this CP plan will list recommended activities which accompany certain technical milestones without reference to specific dates. As work on each site develops, firmer timelines for specific subsites for CP activities will be added to the CP plan.

6. Additionally, due to the numerous subsites, consideration needs to be given on how to avoid duplication of effort, scheduling conflicts and public confusion in proceeding with CP activities.

Therefore: activities planned and required for each subsite will be coordinated to avoid such conflicts and confusion. Also, whenever possible, public meetings and presentations may be combined to address one or more subsite. Fact sheets and other materials or displays will also contain information on more than one subsite as feasible.

7. This NPL site project involves a number of subsites with various contaminate problems and diverse constituencies in different communities.

**Therefore:** this CP plan will need to be both flexible and dynamic. Specific CP activities may be added as the project progresses in order to meet certain community needs. For example, a focused public meeting may need to be held on a particular technical or health risk issue.

All required citizen participation activities will be performed both for the overall RI/FS and for the subsite RI/FSs. Because some subsites may be located near each other and relate to the same residents, community groups, officials, businesses and some other targeted publics, certain fact sheets and/or public meetings may be combined to address one or more subsites.

Beyond the required CP activities, a variety of other activities will be conducted. Some of these activities will be extensions of existing citizen participation programs at sites where remedial programs commenced prior to the lake's NPL listing. A basic component of this CP plan is to build on previous State citizen participation efforts for sites related to Onondaga Lake wherever possible. Past CP activities will be reviewed for their success in informing and involving the public. Where appropriate, the successful activities will be continued and expanded.

## **B. Specific CP Activities**

The following specific citizen participation activities will be planned to accompany the specified technical milestone:

### **Comprehensive NPL RI/FS**

#### **Technical Milestone**

#### **Early Stages of the RI/FS**

#### **CP Activities**

- Establish document and information repositories and inform the public of their locations.
- Develop, update and maintain a comprehensive mailing list.
- Initiate contacts and arrange presentations for area groups and officials on the purpose of the RI/FS and status of ongoing remedial activities. These could "piggyback" wherever possible with regularly scheduled meetings of local groups. In some instances special meetings may need to be arranged. The CPP will be described and input solicited. During these individual and small group meetings, information will also be sought out on changes that have taken place in the population and mind set of the site area. Due to the site's long and protracted history, it will be helpful to assess current community knowledge, perceptions and feelings re: lake remediation.
- Re-establish an Onondaga Lake Advisory Committee which would be solely advisory to DEC in its lake-related activities, in particular the NPL site. Hold meetings as necessary to discuss status and activities related to the NPL site remedial work and receive input.
- A fact sheet shall be written and distributed through the mailing list to the community regarding the RI/FS process, CPP and remedial activities.
- Modify CPP as necessary.

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**Technical Milestone**

**During the Remedial Investigation**

**CP Activities**

- Maintain regular communications with key contacts list. (May include use of newsletter or fact sheets).
- Hold availability sessions for the public to help maintain contact with the community during periods between specific milestone points requiring formal CP activities.
- Give updates and presentations to organizations and agencies as requested. Continuously update information repositories with fact sheets and interim findings as appropriate.
- Take opportunity to display and distribute informational materials to the public through well-attended events such as the County's Annual Lake Waterfront Celebration held each summer. Use and build on existing displays and materials.
- Create and distribute informational materials to assist in increasing the public's understanding of lake issues and the RI/FS process.

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**Technical Milestone**

**Upon Completion of the Remedial Investigation**

**CP Activities**

- Compile fact sheet summarizing RI findings and distribute to mailing list, at presentations and events.
- Place copy of RI report and summary fact sheet in information repositories.
- Offer presentation on RI findings to key contact groups including the Onondaga Lake Advisory Committee.

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**Technical Milestone**

**Upon Completion of Feasibility Study and Proposed Remedial Action Plan (PRAP)**

**CP Activities**

- Prepare a fact sheet summarizing FS and PRAP. Include announcement of public comment period and public meeting.
- Place FS and PRAP in document repositories.
- Notice and hold a 30-day public comment period for PRAP.
- Hold public meeting to address findings and gather public input.

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**Technical Milestone**

**During and After Completion of ROD**

**CP Activities**

- Compile fact sheet on selected remedy and distribute to the mailing list.
- Compile responsiveness summary to respond to significant public comments. Place in document repositories and publish its availability.

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**Technical Milestone**

**Throughout entire remedial process additional CP outreach activities may include:**

**CP Activities**

- graphics display and/or slide show for use at public presentations
- issuance of a periodic newsletter to compliment or substitute for fact sheets.
- incorporation of current efforts to inform the public re: fishing advisories including use of fish consumption advisory brochure in outreach efforts on NPL site.

- development of educational materials for use in area schools and to respond to student inquiries.
- sponsorship of teacher training workshops on Onondaga Lake.
- outreach activities to local schools and other civic, social and religious organizations. (may include presentations and/or distribution of materials).
- focused public meetings or availability sessions on pertinent topics which may arise as project progresses.

## II. CP Activities for Subsites

### A. DURING RI/FS

The citizen participation activities for the subsites will closely mirror those activities listed for the comprehensive NPL-RI/FS and may, in some cases, be incorporated into the comprehensive NPL CP plan activities.

Required activities for each subsite will include:

#### **Before Start of RI/FS**

- Compilation of a mailing list (same list may be used for multiple subsites and overall Comprehensive NPL RI/FS).
- Identification of document repositories (will be the same for all subsites and Comprehensive NPL RI/FS).

#### **Start of RI**

- Initial mailings of fact sheet on the plan for Remedial Investigation for each subsite (will go to entire mailing list for Comprehensive NPL RI).

#### **Completion of FS/PRAP**

- Mailing to contact list describing PRAP and noticing 30 day comment period (may be combined with similar information for more than one subsite at the same point in the process).
-

- Public meeting and/or availability sessions to describe FS and PRAP and gather public comment (may be held to address multiple subsites which may be at the same point in the process).

#### **During/After Completion of ROD**

- Mailing to describe selected remedy and publicize availability of responsiveness summaries for significant comments received during public comment period and at public meetings or availability sessions (again, mailing may contain information on more than one subsite).

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Throughout entire remedial process additional activities may include:

#### **CP Activities**

- subsite specific displays
- periodic newsletter including information on status and findings at subsites.
- one-on-one neighborhood contacts around certain subsites as feasible and appropriate to update nearby residents on status of subsite investigations and interim remedial measures.

#### **B. INTERIM REMEDIAL MEASURES**

A key element to the RI/FS for the NPL site is the implementation of Interim Remedial Measures (IRM's) at any given subsite where a significant threat has been identified and there is urgency in mitigation. By commencing IRM's, as soon as feasible after the need for such action is determined, remedial actions can move ahead prior to completion of the entire RI/FS process.

Citizen participation will be carried out in connection with implementation of any IRM's at subsites. The CP activities to be accomplished will be dependent on the time critical nature of the IRM's.

For Time Critical IRM (planning less than 6 weeks): the State intends to use the subsite's contact list to inform area residents and other interested parties about IRM's plans prior to implementation. Notification methods could include mailing, door to door visitations, fact sheets, press release to local media, or presentation to local town boards.

Additionally, follow-up press coverage would be sought out to report on IRM's operation and effectiveness

Other follow-up communications with the key contact groups would also be implemented.

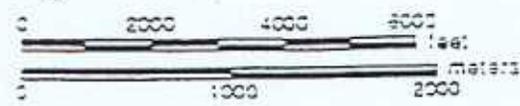
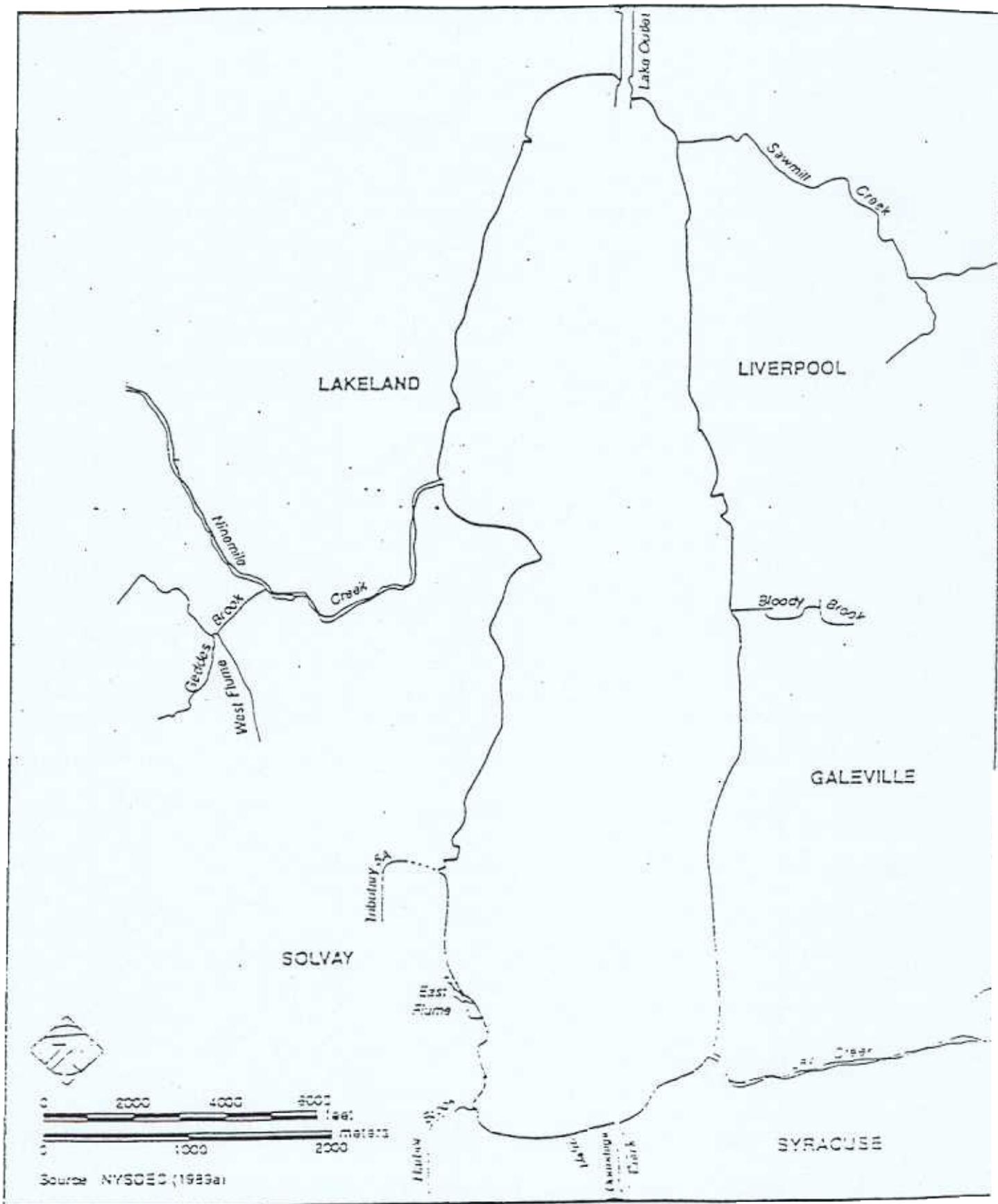
For non-time Critical IRM's (planning more than 6 months): The State would use the subsite's mailing list to notify area residents and other interested parties through various alternative methods as described on the previous page

Additionally, an availability session would be offered for interested parties to review IRM plans, ask questions, and give input.

Follow-up press coverage and contact with interested parties would be implemented.

# Figures

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Source: NYSOEC (1935a)

# Appendix

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# ONONDAGA LAKE NPL SITE AGENCY CONTACT LIST

## Onondaga Lake NPL Site

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NYSDEC Region 7  
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David Nelson  
NYSDEC Fish & Wildlife Division  
Natural Resource Damage Assessment  
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## KEY CONTACT GROUPS

### Environmental

- Onondaga County Environmental Management Council
- Atlantic States Legal Foundation
- Iroquois Chapter of Sierra Club
- Central New York Environment
- Citizen Advisory Committee of the OLMC
- City of Syracuse Conservation Advisory Council

### Business

- Greater Syracuse Chamber of Commerce
- Metropolitan Development Association
- Industrial Development Agency

### Recreation

- Syracuse Yacht Club
- Onondaga Spokesmen's Federation
- Isaac Walton League

### Government

- Onondaga County Executive's Office
- Onondaga County Legislature
- Town of Geddes Board
- Town of Salina Board
- City of Syracuse Common Council
- Village of Liverpool Board
- Village of Solvay Board

### Other

- Friends of Historic Onondaga Lake

## DOCUMENT REPOSITORIES

1. Onondaga County Public Library  
Syracuse Branch at the Galleries  
447 South Salina Street  
Syracuse, NY
  
  2. Liverpool Public Library  
310 Tulip Street  
Liverpool, NY
  
  3. Solvay Public Library  
615 Woods Road  
Solvay, NY 13209
  
  4. Region 7 Office  
NYS Department of Environmental Conservation  
615 Erie Blvd., West  
Syracuse, NY 13204
  
  5. NYS Department of Environmental Conservation  
50 Wolf Road, Room 224  
Albany, NY 12233-7010
-

# Mailing List

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Honorable John DeFrancisco  
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Honorable Michael Hanuszcak  
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Honorable Roy Bernardi  
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Mr Richard Ward  
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## Syracuse Area Environmental Groups

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Syracuse, NY 13204-3757

Citizen's Against Radioactive Dumping  
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Cortland, NY 13045

FSDWAC  
Attn: Sandy Weston  
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Fulton, NY 13069

Izaak Walton League - CNY Chapter  
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NYPIRG  
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Sierra Club-Iroquois Group  
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Syracuse, NY 13201

Syracuse United Neighbors  
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Fred Cannizzo - Planning Board Chairman

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Marc Malfitano - Planning Board Chairman

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21. Bart Bush

Development Director

City Hall

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22. County Executive Nicholas Pirro

Floor

John H. Mulroy Civic Center

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23. William Sanford

Chairman

Onondaga County Legislature

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24. David Coburn

Director Office of Environment

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ONONDAGA VILLAGE MAYORS

. Mayor Jean E. Wells  
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2. Mayor Peter R. Higgins  
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3. Mayor Timothy J. Ganey  
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6. Mayor Richard M. Platten

Village of Jordan

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Jordan, NY 13080

Mayor Frederick Bobenhausen

Village of Liverpool

Hickory Street

Liverpool, NY 13088

8. Mayor Angelo Alabnese

Village of Manlius

Elmbrook Drive

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' 9. Mayor Martin J. Sennett

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10. Mayor John P. Regan

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13. Mayor Mario C. De Santis  
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Mayor Daniel Poellot  
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13 Grove Street  
Tully, NY. 13159

NEWS MEDIA - SYRACUSE AREA

Syracuse New Times  
1415 W. Genesee St.  
Syracuse, NY 13204  
Attn: City Desk

Syracuse Post Standard  
Box 4818  
Syracuse, NY 13221  
Attn: City Desk

WAQX 95.7 FM News Director  
1064 James St.  
Syracuse, NY 13203

WSTM-TV 3 News Director  
1030 James Street  
Syracuse, NY 13203

Press Observer  
44 East Genesee St.  
Skaneateles, NY 13152

WKFM News Director  
1022 Willis Avenue  
Syracuse, NY 13203

Pennysaver News Dept.  
250 Bear St., W.  
Syracuse, NY 13204

WTVH TV News Dept.  
960 James St.  
Syracuse, NY 13203

Editor, N. Syracuse Star News  
423 S. Main St.  
N. Syracuse, NY 13212

WIXT-TV 9 News Director  
5904 Bridge St.  
E. Syracuse, NY 13207

WCNY FM News Director  
506 Old Liverpool Rd.  
Liverpool, NY 13088

Syracuse Herald Journal  
Clinton Sq., Box 4015  
Syracuse, NY 13201  
Attn: City Desk

Marcellus Observer  
44 E. Genesee St.  
Skaneateles, NY 13153

WEZG Radio News Director  
Davis Road N.  
Clay, NY 13041

Liverpool Review  
206 Meyer Rd.  
Liverpool, N.Y. 13088

WNDR Radio News Director  
1235 Old Stonehouse Rd.  
Dewitt, NY 13214

WSYR Radio News Director  
500 Plum St., Ste. 100  
Syracuse, NY 13034

Y 94 FM News Director  
500 Plum St. Ste. 100  
Syracuse, NY 13034

Editor, CNY Environment  
658 W. Onondaga St.  
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Onondaga Valley News  
250 Bear St. W.  
Syracuse, NY 13204

Camillus Advocate  
Attn: News Desk  
Camillus, NY 13037

WSEN News Director  
P.O. Box 1050  
Baldwinsville, NY

Skaneateles Press  
44 E. Genesee St.  
Skaneateles, NY 13152

Community Papers  
300 Brooklea Drive  
Fayetteville, NY 13058

News Media - Svracuse Area

2.

Baldwinsville Messenger  
9 E. Genesee St.  
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WCNY-TV News Director  
506 Old Liverpool Rd.  
Liverpool, NY 13088

WHEN Radio News Director  
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Syracuse Banner News  
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FULMER, SHARON 635-3921  
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