New York State Department of Environmental Conservation
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Alexander B. Grannis
Commissioner

July 1, 2010

Mary Ann Coogan, Supervisor
Town of Camillus
4600 West Genesee Street
Syracuse, New York 13219

Dear Supervisor Coogan:

Thank you for your invitation to participate in the recent meeting between EPA Region 2 Administrator Judith Enck and Town of Camillus (Town) officials. The meeting was very productive and the Town very clearly expressed its concerns and interests in the Onondaga Lake Bottom remediation project. Following that meeting, Regional Administrator Enck and Commissioner Grannis have engaged in an ongoing dialogue between EPA and DEC to come up with additional ways the agencies can be responsive to the concerns raised by the Town of Camillus and its residents.

From the initiation of the proposal to remediate the Onondaga Lake Bottom site, the agencies have been cognizant of the concerns of the Town of Camillus and its communities. While we have made an effort to address those concerns as raised, in light of the current interest, we think it would be appropriate to enhance those efforts to ensure that the Town has an opportunity to be fully engaged in finalizing the SCA plan. Through this enhanced collaboration and consultation, the Town will have a significant and substantial opportunity to: i) become aware of the details of proposed actions, ii) engage the State and EPA in detailed discussions regarding the design and operation, and iii) influence the decisions.

Generally, DEC and EPA will:

- Ensure that the Town has accurate, and timely, information and/or access to the information needed to understand the project as it moves forward;
- Provide the Town with the opportunity to give informed and meaningful input;
- Give full consideration to Town input; and
- Assist the Town in understanding the project decision making process during project design and implementation.

Specifically, the DEC, working closely with EPA, proposes the following:

- DEC project managers and engineers will be available as necessary to meet with the Town engineers to discuss design and operation issues. I believe the recent meetings between DEC and Town engineers have been productive and would like to formalize a process for further engagement. The agencies intend to review and discuss the design and operation concerns raised by Town engineers as part of this process. Design documents, data and other information submitted to DEC from Honeywell will be shared with Town engineers earlier in the process to allow for more productive participation from the Town.
- DEC decision makers will be available to meet with the Town attorney and Town officials to discuss issues of concern raised by the Town.
- To the extent needed to participate in any meetings between the Town and Honeywell, DEC will participate as requested by the Town.
- Alternatives – DEC has advised the Town that an extensive review of alternatives for remediation was undertaken as part of the process to come up with the remediation plan. To the extent new alternatives were raised recently by the Town and others, DEC and EPA has explored their potential. Specifically, DEC engineers met with Town engineers to review several alternatives including the offsite disposal alternatives, in-lake disposal, and use of the Salina Landfill site. In addition, the new treatment technologies proposed by the Camillus citizen group have been initially reviewed by both DEC and EPA. As stated by Ms. Enck, the agencies have not found these new technologies applicable to the Onondaga Lake project, but both agencies would be amenable to review further information as provided by the Town.
- Timeframes –In order to allow public review of EPA's Human Health Risk Assessment and the proposed Community Health and Safety Plan for initial construction, the DEC has delayed the start of preliminary site work on Wastebed 13 from July 1 to August 1, 2010. Because of this delay, it is extremely important that preliminary construction activity start soon in order to meet the dredging commencement day of May 2012. Nonetheless, as set forth below, we believe that there is sufficient time to review the Town's design concerns in advance of significant SCA construction which is not scheduled to begin until later this fall.
- The construction schedule currently calls for initial SCA and Waste Water Treatment Plant site work to be accomplished in August and September, 2010. Essentially, this preliminary work will consist of site grading and clearing, preloading for the WWTP and starting some work on the SCA berms. Construction of the SCA liner and other features of concern for the Town will not begin until October 2010 at the earliest.
- The design schedule currently calls for the draft final sediment management design documents to be submitted in January 2011. These detailed design documents are expected to address many of the project aspects that the Town has questioned and/or expressed concerns over.
- Given this schedule, DEC and EPA believe that the next six months can be used as an intensive consultation period to actively engage the Town in fruitful discussion of its concerns. EPA, DEC and the Town can utilize this time to actively seek resolution of open issues prior to and during the initial phases of the construction work.

- Please note that even after the commencement of the significant SCA construction, EPA and DEC intend to continue a process of Town involvement in the finalization of project design issues and the oversight and planning for dredging and SCA operation scheduled for May 2012.

It is my understanding that the Town's attorney, Gary Bowitch, Esq., will soon be setting up meetings with Honeywell and DEC to further discuss the concerns of the Town. Please be assured that both the DEC and EPA remain committed to active discussion with the Town and its consultants to further improve the project.

I look forward to working with the Town in improving the process and remediating Onondaga Lake.

Sincerely,

Kenneth P. Lynch
Regional Director

KPL/pw

ec: Judith Enck, EPA Region 2 Administrator
Alexander B. Grannis, DEC Commissioner
Gary Bowitch, Esq.