49578

Declaration for the Record of Decision

Site Name and Location

Sealand Restoration Site, Town of Lisbon, St. Lawrence County, New York

Assessment of Site

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response actions selected in this Record of Decision (ROD), may have presented an imminent and substantial threat to public health, welfare, or the environment.

Statement of Basis and Purpose

This decision document presents the interim remedial actions selected and implemented to address contaminated soils and solid wastes for the Sealand Restoration site (Site), located in the Town of Lisbon, St. Lawrence County, New York, which were chosen in accordance with the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA) and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This decision document explains the factual and legal basis for selecting the interim remedial actions for the Site and is based on the administrative record for this Site. Copies of the NYSDEC RI/FS and supporting documentation are included in the administrative record file and are available at the Information Repositories at the following locations: the Lisbon Town Hall, Lisbon, New York, NYSDEC, 50 Wolf Road, Albany, New York; USEPA, 26 Federal Plaza, New York, N.Y.

NYSDEC's implementation of the interim remedial actions indicates its concurrence with the selected interim remedies.

Description of the Selected Remedy

The New York State Department of Environmental Conservation (NYSDEC) and the County of St. Lawrence undertook remedial actions from 1987-88 and from 1989-90 to remove, treat and dispose of hazardous substances present at the Sealand Restoration site. As NYSDEC authorized state resources to fund the remedial work, NYSDEC intends to formally submit an application to the Environmental Protection Agency (EPA) to obtain credit for the expenses incurred pursuant to §104(c)(5)(B) of CERCLA. As part of EPA's preparation for review of the State of New York's application, EPA has examined the implemented remedies. The purpose of this decision document is to announce

EPA's finding that the NYSDEC selection of response actions needed to address contaminated soils and solid wastes at the Site was appropriate. Ultimately, EPA must determine that the expenditures were reasonable, documented, direct, out-of-pocket, non-federal expenditures subject to the limitations specified in CERCLA section 104(c)(5) before giving the state credit for EPA's share of the costs. This decision document also calls for a supplemental Remedial Investigation/Feasibility Study (RI/FS) to investigate the need for further remedial work at the Site.

The interim actions undertaken from 1987-88 in a drum storage area and from 1989-90 in a cell disposal area were intended to address principal threats to human health and the environment attributed to the presence of contaminated solid and liquid substances. Under these remedial actions hazardous substances were excavated and taken off-site for treatment/disposal.

The major components of the implemented remedies include the following:

- Excavation and treatment, via off-site thermal destruction, of all solid wastes removed from the cell disposal area;

- Placement of an engineered multi-layered cap and cover over the cell disposal area to significantly reduce infiltration of rainwater into the disposal cell so as to prevent leachate generation and groundwater contamination. Installation of leachate monitoring system for future monitoring of the cell disposal area;

- Disposal of the treatment residuals at an off-site RCRA hazardous waste facility; and

- Excavation and off-site treatment/disposal of solid and liquid wastes removed from the drum storage area.

The major components of the follow-up investigation are:

- Confirmatory surface/subsurface sampling to ensure that past State and County remedial actions were effective in removing contaminant source materials;

- Supplementing existing information as to the nature and extent of site-related surface/subsurface soil contamination in the landspreading area;

- Supplementing existing information as to the nature and extent of site related groundwater, surface water and wetland contamination;

- Estimating risks posed by site contamination to human health and ecology;

- Conducting a cultural resources survey to comply with requirements of the National Historic Preservation Act;

Declaration of Statutory Determinations

The selected remedy is protective of human health and the environment, complies with Federal and State requirements that are legally applicable or relevant and appropriate to the remedial action, and is cost effective. This remedy utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable, and it satisfies the statutory preference for remedies that employ treatment that reduce toxicity, mobility, or volume as their principal element.

Because this remedy will result in hazardous substances remaining on site above health-based levels, a review will be conducted within five years after commencement of remedial action to ensure that the remedy continues to provide adequate protection of human health and the environment.

Constantine Sidamon-Eristoff
Regional Administrator

9/28/90
Date

DECISION SUMMARY

SEALAND RESTORATION SITE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

NEW YORK

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INTRODUCTION

This Record of Decision (ROD) identifies the alternative response actions considered for the Sealand Restoration, Inc. (Sealand Restoration) site (Site), and describes the response actions implemented by the New York State Department of Environmental Conservation (NYSDEC) and the St. Lawrence County Environmental Management Council at the Site.

As the Site was not yet proposed for listing on the EPA National Priorities List (NPL), and was, therefore, not eligible for cleanup under the federal Superfund program, the County of St. Lawrence and NYSDEC conducted remedial actions in 1987-88 and 1989-90 to remove, treat and dispose of existing sources of contamination in the drum storage and cell disposal areas at the Sealand Restoration site. Since NYSDEC expended state resources to fund the remedial work, and since the Site has since been listed by EPA on the NPL, NYSDEC intends to submit an application to EPA to obtain credit for the expenses incurred pursuant to Section 104(c)(5)(B) of CERCLA. As EPA considers the types of response actions undertaken to be appropriate interim actions, EPA is presenting this ROD to announce this finding. This ROD also calls for a supplemental Remedial Investigation and Feasibility Study (RI/FS) to assess residual contamination at the Site.

SITE NAME, LOCATION AND DESCRIPTION

The Sealand Restoration site is located in the Town of Lisbon, St. Lawrence County, New York (Figure 1). As shown in Figure 2, the irregularly shaped Site, comprising two parcels of land approximately 210 acres in total area, is situated south of Pray Road, about 2.5 miles southwest of the Village of Lisbon.

Two different corporations operated at the Site: Sealand Restoration, Inc. and Sealand Industrial Services, Inc.

The area surrounding the Site is predominantly farmland with a significant amount of wetlands drained by intermittent low-flow streams. (See Figure 3.) The area is sparsely populated; however, residential homes and farmhouses can be found as near as 100 feet from the facility's property line.

The areas of contamination on the Site include Area 1 (the landspreading area), Area 2 (the cell disposal area), and Area 3 (the drum storage area). (See Figure 4.)

The landspreading area, Area 1, actually consists of twelve distinct open fields where liquid, biodegradable wastes considered "vegetable oil" was intended to be spread on the ground in a thin layer. This oil was to be worked into the soil prior to cultivation and planting with corn. However, the wastes which were landspread were characterized as a petroleum oil-based liquid containing generally low levels of metals and

polychlorinated biphenyl (PCB) contaminants. Improper landspreading practices apparently resulted in runoff of oily wastes into nearby streams and wetlands. After the site was abandoned, most of the fields were cultivated and crops were harvested. The northern fields were subsequently plowed with corn, and the southern fields were utilized as hayfields. These fields are currently not in use.

The cell disposal area located in the southern part of the Site, Area 2, was originally designed as a disposal site for oil spill debris containing no readily drainable fluids. Oily waste materials such as chemical solvents used in clean-up operations were disposed of in the pit for approximately one year. Remedial actions conducted in 1984 and 1989-90 uncovered a total of 1,680 buried drums and 4,912 cubic yards of contaminated soils. The disposal cell was located less than 100 yards from a 100-acre, NYSDEC-designated wetland. This wetland area drains into an unnamed tributary to Sucker Brook.

The drum storage area, Area 3, was an unapproved disposal area located in the northern part of the Site, in the vicinity of a house and barn. Approximately 200 empty or nearly empty drums were stacked in the barnyard. Residue from these drums accumulated as a tar-like sludge on the ground surface, beneath and around the drums. Alongside the barn was a 2,000-gallon tanker-trailer containing less than 1,000 gallons of waste oil. A 20,000-gallon capacity waste storage tank containing 5,000 gallons of waste oil was located southeast of the barn (see Figure 4). The tank was used for temporary storage of waste oil until it could be landspread on the fields.

Private wells in the area are mainly used for domestic and agricultural purposes with only one municipally-owned public water supply within three miles of the site. The Hamlet of Lisbon is served by a municipal water supply which is owned and operated by the Town of Lisbon. This system consists of a supply pumped from the bedrock aquifer. The bedrock aquifer may be hydraulically connected with the overburden aquifer in the Site area. Approximately 25 additional private wells located on Pray, McFadden, and Tuck Roads are located within a one-mile radius of the site.

SITE HISTORY

In 1977, officials representing Sealand Restoration, Inc. acquired the former 210 acre dairy farm for use as a disposal facility. In 1979, Sealand Restoration, Inc. was permitted to accept waste products. Under the terms of an NYSDEC-issued permit, only uncontaminated waste, petroleum wastes and mineral oils were acceptable for disposal; specific approval was required for stockpiling of any wastes or disposal of any contaminated wastes.

In 1980, NYSDEC determined that Sealand Restoration was out of compliance with the permit and the use of the facility as a disposal area was ordered to cease. The landspreading permit was voided in April, 1980. On November 10, 1981, officials from Sealand Restoration signed an Administrative Consent Order with the NYSDEC under which the firm agreed to undertake measures to address contamination at the site. Shortly after signing this Order, Sealand Restoration officials defaulted on the Order and filed for bankruptcy.

In 1983, Engineering Science, Inc. performed an NYSDEC Phase I Study. After completion of the Phase I Study, Dames and Moore was hired to perform an NYSDEC Phase II Study.

During 1984, St. Lawrence County received a $100,000 Local Assistance Grant from the New York State Legislature to perform limited remediation at the site. This included the removal of 133 surface drums, 60 full or partially full buried drums, 42 empty buried drums, 150 cubic yards of contaminated soil from the cell disposal area. (See Figure 4.) The work was conducted by Fourth Coast Pollution Control, Inc. These wastes were transported to SCA Chemical Services, Inc., Model City, New York.

In 1986, using funds provided in the State's 1984 authorization, 1,000 gallons of liquid from the 20,000 gallon waste-storage tank located in the drum storage area were removed by Fourth Coast Pollution Control, Inc. and received by Quantex Chemical, Inc. in Kitchner, Ontario.

From 1986 through 1987, Dames and Moore, under contract with the NYSDEC, conducted an RI/FS (NYSDEC RI/FS), for the disposal areas on Site. The results of the RI identified three distinct source areas needing evaluation. (These are Areas 1, 2, and 3 as described in the Site Location and Description section.) The FS concluded that the removal and off-site disposal of contaminated wastes and soils from the cell disposal area (Area 2), and drum storage area (Area 3), were the preferred remedial alternatives.

The NYSDEC prepared public notices of the availability of the RI/FS, including the description of the proposed remedial plan contained therein, for public review and comment. On July 22 and July 25, 1987, such notices were published in the Watertown Daily Times, announcing a public meeting at which NYSDEC officials would be available to discuss the proposed remedial plan and receive and reply to public comments. NYSDEC also provided a 30-day period for submission of written comments on the proposed remedial alternatives in the RI/FS.

The public meeting was held on August 5, 1987, and a transcript was made. After the close of the public comment period, the NYSDEC prepared a written summary of the comments it had

received, and written responses to those comments. (See Appendix 6.) Based on the RI/FS, and considering all the public comments, the NYSDEC decided to implement the proposed alternative for the drum storage area.

From 1987 through 1988, utilizing two appropriations from the State of New York totaling $90,000, the County of St. Lawrence implemented a portion of the proposed remedial plan at the site. This work included: (1) removal, transportation, and off-site disposal of 200 drums and the tar-like sludge from the drum storage area located near the barn (this includes approximately 20 cubic yards of contaminated soils); (2) draining, transportation, and off-site disposal of the 5,000 gallons of waste oil in the waste-oil tank; (3) dismantling, transportation, and off-site disposal of the waste-oil tank; (4) removal and off-site disposal of the tanker-trailer and (5) removal of small quantities of acids and miscellaneous contaminated debris (hoses, buckets, etc.). All of these wastes were located in the drum storage area (Area 3). The removal was conducted by Environmental Oil, Inc. of Syracuse, New York. Solid wastes were disposed of at the Chemical Waste Management, Inc. facility in Model City, New York. Liquids and oil soaked debris were received by Environmental Oil, Inc. in Syracuse, New York. Flammable liquid wastes were disposed of at the Solvents and Petroleum Service, Inc. facility in Syracuse, New York. Corrosives and combustible liquids were disposed of at Frontier Chemical Waste Management in Niagara Falls, New York.

In 1987, the NYSDEC requested EPA to conduct a removal action in the cell disposal area. In 1988, EPA informed NYSDEC that the EPA was unable to conduct a removal action because of budget constraints. Therefore, NYSDEC authorized funding to conduct the removal of the waste disposal cell. NYSDEC requested that EPA authorize pre-award costs for performing this work in January, 1989. From 1989 through 1990, Sevenson Environmental Services, under contract with NYSDEC, implemented the remaining elements of the proposed remedial plan. The contractor removed 1,445 drums, 4,762 cubic yards of contaminated soil, and 375,000 gallons of liquid from the cell disposal area (Area 2), at a cost of approximately $20 million. Solid wastes were transported to Rollins Environmental Services in Deer Park, Texas or to L.W.D. in Calvert City, Kentucky. Liquid wastes were sent to ENSCO in El Dorado, Arkansas, Thermal Oxidation Corp. in Roebuck, South Carolina, or to Frontier Chemical Waste Process in Niagara Falls, New York. The disposal cell was back-filled with clean soil and covered with a multi-layered cap to significantly reduce infiltration of precipitation and control the generation of additional leachate which would impact the underlying groundwater. A leachate monitoring system was installed to periodically monitor the groundwater within the closed cell. The project was completed in March 1990.

On August 27, 1990, the Sealand Restoration site was listed on the NPL.

ENFORCEMENT ACTIVITIES

In mid-June 1980, NYSDEC ordered Sealand Restoration, Inc. to stop dumping and spreading the oily waste both in the disposal cell and on the fields. Sealand Restoration, Inc. was subsequently fined $4,500 for polluting the environment.

On November 18, 1981, representatives of Sealand Restoration, Inc. signed a Consent Order under which it was agreed to undertake measures to address the problems determined to exist at the Site. Due to non-compliance with the terms of the Order, a Notice of Intention to Vacate a Suspended Penalty was issued on December 14, 1981, and the case was referred to the State Attorney General's office.

On May 31, 1983, the State Attorney General's office filed a complaint before the State of New York's Supreme Court in Albany County. A default judgement was entered on July 20, 1984, under which Sealand Restoration, Inc. was required to address the contamination at the site and a pay a fine of $8,000. No payment has been collected from Sealand Restoration, Inc.

The site is currently vacant. An attorney previously responsible for Sealand Restoration, Inc. affairs has indicated that Sealand Restoration, Inc. is out of business. According to the deed on file in the St. Lawrence County courthouse, Sealand Restoration, Inc. is still listed as the owner of the site property.

EPA is currently conducting a search for potentially responsible parties (PRPs). Based upon preliminary information obtained from this search, EPA sent information request letters on August 24, 1990 to 61 individuals and companies who may have knowledge of or been involved with the disposal of contaminated wastes at the Site. The responses to those letters are currently being evaluated as a basis for further action. All future enforcement activities contemplated by EPA will be coordinated with the ongoing efforts of the New York State Attorney General's office.

Because some of these individuals and companies may be PRPs, and might ultimately be liable for any expenses incurred by EPA in connection with response activities at this site, EPA also notified each of these parties of our intention to issue this ROD determining that the remedial plan proposed and implemented by the State was appropriate under CERCLA. EPA solicited comments from these parties on the remedial plan selected by the State, and has considered and responded to all comments received. (See Appendix 5 hereto.)

HIGHLIGHTS OF COMMUNITY PARTICIPATION

The RI/FS report for the Sealand Restoration site was made available to the public from August 5, 1987 to September 4, 1987 in the NYSDEC Albany office and Regional Office located in Watertown, New York and at the St. Lawrence County Planning Board office, Canton; Public Library, Ogdensburg; and Town Clerk, Lisbon. A public meeting was held on August 5, 1987 at the Lisbon Town Hall to report results of the RI at the site, describe the basis for the proposed remedial clean-up plan, describe the alternatives which were considered, and receive public input on the alternatives. As noted above, all comments received were considered, and a responsiveness summary was prepared. (See Appendix 6.)

Subsequent public meetings were held on February 14, 1989 and October 19, 1989. At the February meeting, discussions were held on implementation and time schedules for excavation and disposal of buried drums and contaminated soil from the cell disposal area. At the October meeting, information on the progress of the site clean-up was provided.

On August 24, 1990, EPA notified the 61 recipients of EPA's information request letters of our intention to issue this ROD ratifying the State's proposed plan, and soliciting their comments on that plan. Their comments were received during the 30-day comment period EPA provided.

As part of the planned supplemental RI/FS at this site, EPA intends to conduct an extensive community relations program in order to solicit comments on the scope of future site activities and explain the relationship between the effort undertaken by NYSDEC and the work to be effected by EPA. All community relations activities will be coordinated with the ongoing public involvement efforts of NYSDEC.

SCOPE AND ROLE OF RESPONSE ACTION

This ROD discusses the interim response actions implemented at the cell disposal area and the drum storage area only. It does not address contaminant pathways such as the groundwater and surface waters that may have been impacted by contaminated wastes present at the Site. Although the NYSDEC RI/FS did address potential site-related groundwater and surface water contamination as well as soil contamination and stored hazardous waste, EPA believes that further investigation is needed to evaluate the nature and extent of site-related groundwater, surface water and wetland contamination, and to evaluate the nature and extent of site-related surface/subsurface soil contamination in the landspreading area and drum storage areas. Confirmatory sampling is also required to ensure that past State and County remedial actions were effective in removing

contaminant source materials. Therefore, a subsequent RI/FS is planned to address these concerns. As noted previously, EPA is currently developing a workplan for the subsequent RI/FS. The remedy specified herein is considered to be an interim action; the final remedy for the site (addressing the soils, sediments, surface water and groundwater) will be proposed at the conclusion of the supplemental RI/FS.

The NYSDEC RI/FS indicated that the presence of contaminated soils and stored hazardous waste in the drum storage area and the cell disposal area posed a principal threat at this site because of risks to human health from dermal contact, ingestion of contaminated substances, and inhalation of harmful dusts or vapors. The contaminated soil and stored hazardous wastes also provided a direct source of contamination for groundwater and surface water at the site. Two principal response actions were undertaken to reduce the threat from immediate hazards and to remove the potential sources of contamination present on the site. The two actions, conducted from 1987-88 in the drum storage area and from 1989-90 in the cell disposal area, implemented the preferred remedial alternatives identified in the NYSDEC RI/FS.

The remedial actions taken were authorized by the State of New York subsequent to the 1987 public meeting, but were implemented prior to the issuance of this ROD. Although the issuance of a ROD normally precedes remedial action, the EPA considers the previous decisions by the State of New York and the County of St. Lawrence to proceed with remedial action, rather than to delay cleanup until federal funds became available, to be beneficial and necessary in order to reduce risks to the public from existing site hazards and to prevent further potential contamination of groundwater and surface waters in the area.

SUMMARY OF SITE CHARACTERISTICS

A description of contaminants present in the cell disposal and drum storage areas is provided separately.

Cell Disposal Area

Prior to the remedial work conducted in 1989, the cell disposal area, which measured approximately 100 feet by 75 feet, contained 1,445 buried drums, 4,762 cubic yards of contaminated soils, and 375,000 gallons of liquid. Analysis of a composite waste sample of the liquid for Hazardous Substance List (HSL) organic compounds conducted during the RI indicated the presence of 11 volatile organic compounds in concentrations ranging from 52 to 7400 micrograms per liter (ug/l) including chlorinated, aliphatic hydrocarbons and petroleum derivatives. Semi-volatile compounds, pesticides, and metals were also detected. The results of this analysis are presented in Table 1. (Waste Sample W-1.) Analysis

of groundwater sampled from a monitoring well (Well DM-8, see Figure 5) located approximately 100 feet downgradient of the disposal cell indicated a concentration of 40 to 50 ug/l each of 1,1,1-trichloroethane, trichloroethene, and benzene, all volatile organics. The New York State standard for total primary organic concentration is 50 ug/l. The New York State and federal drinking water standards for benzene and trichloroethene are 5 ug/l. NYSDEC groundwater standards for cadmium and manganese were also exceeded in monitoring wells located near the disposal cell.

Groundwater samples collected from private wells have not revealed detectable contamination in the homeowner wells attributable to the Sealand Restoration site. Groundwater contamination will be reassessed as part of the subsequent planned RI/FS.

Drum Storage Area

Approximately, 20 cubic yards of contaminated soils and 200 empty or partially filled drums containing contaminated material were present in the drum storage area. Residual tar-like sludge from the drums accumulated on the ground surface beneath and around the drum stack. The sludge was 2 inches thick and covered about 150 square feet. The drum storage area encompassed approximately 2,500 square feet. Several drums were estimated to have 5 gallons or more of a tar-like, oily substance in them, and the thick tar-like waste accumulated on the ground according to observations made during the RI field work conducted in 1986. Surface water did not appear to be in contact with the waste in the drum storage area.

The analysis of a composite waste sample (W-2), taken during the RI, revealed the presence of six volatile compounds and five semi-volatile compounds. No pesticide/PCB contamination was reported, though detection limits were high due to interference. Reported concentrations for all metals tested were low or not detected. This waste sludge material can be characterized as a mixture of petroleum oil-based product with organic solvents. The results of this analysis are presented in Table 1.

The soils beneath the drum stacks in the drum storage area were sampled at two locations; 1N and 2N, at two depths, 18 inches and 30 inches. The sampling and analysis for HSL organic and inorganic compounds was undertaken to assist in determining whether migration of contaminants downward through the soil column was taking place. At the 18 inch depth for 1N-S and 2N-S, one semi-volatile compound, di-n-butylphthalate, was detected at low concentrations. Also detected were low levels of insecticide Beta-BHC and Heptachlor at 1N-S, and 4,4'DDT at 2N-S, all below contract laboratory program (CLP) detection limits. The deep samples at the same locations, 1N-D and 2N-D, contained

low concentrations of 1,1,1 trichloroethane, di-n-butylphthalate, Beta-BHC and Heptachlor. Only Beta-BHC at 24.1 ug/kg at 2N-D exceeded the CLP detection limit. The presence of insecticide compounds may be related to the farming activities which have taken place at the Site previously.

Also included in the removal of contaminants from the drum storage area was the 20,000-gallon waste storage tank and the 2,000-gallon tanker-trailer to the west of the barn.

The waste in the 20,000-gallon waste storage tank was characterized as a petroleum oil-based liquid containing generally low levels of metal and PCB contaminants. Table 2 presents the results of analyses performed for St. Lawrence County on the liquid tank in 1986. Benzene, toluene, ethylbenzene, xylene, methyl isobutyl ketone, chromium and lead are among the compounds found which are listed RCRA hazardous wastes. Additional analyses taken in June of 1985 indicated that lead concentrations exceeded the extraction procedure (EP) toxicity standard. Approximately 6,000 gallons of this waste were removed in separate actions undertaken by the County in 1986 and 1987.

The analysis of waste in the tanker-trailer to the west of the barn is presented in Table 3. The waste was characterized as an oil- or grease-based substance containing heavy metals and chlorinated organic compounds including two dichlorobenzene compounds at concentrations of 190 and 210 parts per million (ppm). Dichlorobenzenes are semi-volatile or halogenated aromatic compounds used mostly as industrial solvents. Approximately 1,000 gallons of this waste was removed by the County in 1987.

SUMMARY OF SITE RISKS

Qualitative site risks are discussed separately for the cell disposal area and drum storage area. As part of the subsequent RI/FS, a quantitative risk assessment will be conducted in both areas.

Cell Disposal Area:

The hazardous waste present in the cell disposal area posed the risk of adversely affecting public health and the environment.

Several of the contaminants detected in the cell disposal area are suspected carcinogens in humans or are known carcinogens in animals. Other chemicals detected are known human carcinogens. Exposure to the contaminants can also result in non-cancer effects. Human health could have been impacted by ingestion of or dermal contact with the surficial tar, liquids or drum contents. In addition, the potential inhalation of harmful dusts

or vapors from the cell disposal area existed. The potential migration of contaminated groundwater to drinking water aquifers could present additional human health risk in the form of ingestion of contaminated drinking water or dermal contact with water used for domestic purposes.

Groundwater contaminant migration would also pose environmental health risk to downgradient wetlands and ultimately, Sucker Brook, a pike spawning ground. Aquatic life, animals and birds inhabiting the wetlands, could have been adversly impacted by such a release.

Drum Storage Area

Although the drum storage area was relatively small in size (approximately 2500 square feet), it was of concern because it was not a permitted disposal area, with proper site preparation. Groundwater contamination was possible since the drum storage area receives precipitation, and the waste materials were in contact with the ground surface in some locations. Human health risks from the drum storage area included adverse impacts attributed to dermal contact with or ingestion of wastes, and inhalation of contaminated dusts or vapors. In addition, the risks associated with groundwater contamination include ingestion and dermal contact with contaminated groundwater from homeowner groundwater wells used for drinking water or for domestic use. Risks to the environment included adverse impacts to plant and animal life due to migration of leaked waste oils from the waste storage tank or tanker-trailer, or from contaminated groundwater to surface waters and adjacent wetlands.

DOCUMENTATION OF SIGNIFICANT CHANGES

There are no significant changes from the implemented alternative presented in the Proposed Plan.

DESCRIPTION OF ALTERNATIVES

CERCLA requires that each selected site remedy be protective of human health and the environment, be cost effective, comply with other statutory laws, and utilize permanent solutions and alternative treatment technologies and resource recovery alternatives to the maximum extent practicable. In addition, treatment as a principle element for reduction of toxicity, mobility, or volume of the hazardous substances, is preferred.

The NYSDEC RI/FS evaluated, in detail, five alternatives for addressing the cell disposal area (CD) and three alternatives for addressing the drum storage area (DS). These alternatives were further evaluated and modified by NYSDEC prior to selection and implementation of the remedy to determine compliance with the

Land Disposal Restrictions which became effective subsequent to the RI/FS report. These alternatives, which are combined below where they are identical, are:

Alternative CD-1/DS-1: No Action

This alternative allowed only for the periodic monitoring and reassessment of public health and environmental impacts posed by the Site. Land use restrictions included a site security fence and limitations on future land uses to reduce the potential for direct contact with contaminated materials.

Alternative CD-2/DS-2: Excavation, Removal, and Off-site Treatment/Disposal of Wastes and Highly Contaminated Soils

This alternative included the off-site treatment and disposal of solid waste and contaminated soil from the drum storage area and the cell disposal area.

The drum storage area contained approximately 200 empty or partially filled 55-gallon steel drums, approximately 20 cubic yards of contaminated soils, a 20,000 gallon above-ground storage tank containing 5,000 gallons of oily wastes, and a 2,000 gallon tanker-trailer containing less than 1,000 gallons of waste oil.

For the cell disposal area this alternative included the excavation, treatment/disposal of 1,445 buried drums, 4,762 cubic yards of contaminated soils and 375,000 gallons of liquid wastes, and backfilling with clean soil.

Hazardous wastes were to be treated, as necessary, pursuant to RCRA Land Disposal Restrictions in 40 CFR 268 and disposed of in a RCRA permitted Subtitle C facility. An environmental monitoring program would be established to assess the long-term effectiveness of this alternative.

Alternative CD-3/DS-3: Excavation, Removal and On-Site Incineration of Wastes and Highly Contaminated Soils

This alternative included the excavation and removal of wastes and contaminated soils as described for Alternative CD-2/DS-2. It provided for on-site thermal destruction of contaminants through incineration.

Incineration of hazardous wastes was to comply with required treatment standards for spent solvents subject to Land Disposal Restrictions in 40 CFR 268. Incinerator residuals such as ash and filters are considered hazardous waste by the "derived-from rule" (40 CFR 261.3(c)(2)) and were to be disposed of in accordance with Land Disposal Restrictions.

Alternative CD-4: Excavation, Removal, and Off-Site Incineration of Wastes and Highly Contaminated Soils; Cover and Cap

This alternative called for the excavation of contaminated materials from the cell disposal area as described in Alternative CD-2. All solid and liquid wastes were taken to an off-site RCRA permitted Subtitle C facility for incineration and ultimate disposal.

It also included the placement of an engineered cover and cap to inhibit the infiltration of precipitation through residual contaminants in the cell disposal area, thus minimizing leachate generation and groundwater contamination. A leachate monitoring system was installed prior to backfilling so as to provide for future monitoring of the cell.

Alternative CD-5: Excavation, Removal, and On-Site Incineration of Wastes and Highly Contaminated Soils; Cover and Cap

This alternative was identical to Alternative CD-4 except that wastes and highly contaminated soils were to be treated on-site by thermal destruction methods as specified in Alternative CD-3.

STATE REMEDY SELECTION

Based on its review of these alternatives, and comments received during the public comment period, NYSDEC selected Alternatives CD-4 and DS-2 for implementation. These were the alternatives identified as the Preferred Remedial Alternatives in the proposed remedial plan contained in the RI/FS.

EPA EVALUATION

Based upon an evaluation of the various alternatives, EPA agrees that Alternative DS-2, "Excavation, Removal, and Off-site Treatment/Disposal of Wastes and Highly Contaminated Soils," and Alternative CD-4, "Excavation, Removal, and Off-Site Incineration of Wastes and Highly Contaminated Soils; Cover and Cap," are appropriate choices for remediation of the principal threats posed by the drum storage and cell disposal areas, respectively. Alternative CD-4 included the off-site incineration of all hazardous wastes excavated from the cell disposal area, and Alternative DS-2 provided for off-site disposal of all hazardous waste contained in the drum storage area.

Both alternatives selected and implemented by the State and the County, (Alternative CD-4 and DS-2), are appropriate and reasonable interim actions under the federal Superfund program. The principal threats posed by contamination at and emanating from the cell disposal area and the drum storage area have been mitigated and/or eliminated by these actions. The following discussion will explain EPA's rationale for determining the

appropriateness and reasonableness of the remedies selected by NYSDEC and illustrate how the selected actions comply with the mandates of CERCLA. (See Summary of the Remedial Alternatives for CERCLA mandates).

Cell Disposal Area

Alternative CD-4, "Excavation, Removal, and Off-Site Incineration of Wastes and Highly Contaminated Soils; Cover and Cap," is a permanent remedy which employs treatment to reduce and/or eliminate the toxicity, mobility and volume of contaminants which pose a principal threat at the Site. It was designed to be protective of human health and the environment and to comply with all other environment statutes, especially RCRA, in terms of treatment and disposal of hazardous materials, as well as proper closure of a disposal cell. It should be noted that this was an interim action, and while the action itself is deemed to be protective, further actions may be necessary in order to fully protect human health and the environment. This will be determined via a second operable unit study, as noted previously.

Alternative CD-4 is identical to Alternative CD-5, except that Alternative CD-5 employs on-site incineration for destruction of contaminated materials. Alternative CD-4 was considered more reliable in reducing the mobility, toxicity and volume of contaminants than Alternative CD-5, since it employs standard incineration technology, and an on-site incinerator would have required test burns to prove its efficiency. Alternative CD-4 was implemented far more expeditiously than Alternative CD-5 could have been since the test burns could have taken one to two years. It was also determined that Alternative CD-4 was more implementable than Alternative CD-5 due to expected public opposition to on-site incineration. Both alternatives offer far more protection of human health and the environment than Alternatives CD-1, CD-2 and CD-3 due to the presence of the cap and cover which will minimize the generation of leachate and its subsequent migration to the groundwater.

Although Alternative CD-4 is the most costly of the alternatives considered, its cost is deemed to be proportional to its effectiveness due to the reliability, timing, and implementability factors cited above. A total cost of approximately $20 million was expended by NYSDEC for the remediation project in the cell disposal area.

Drum Storage Area

Alternative DS-2, "Excavation, Removal, and Off-Site Treatment/Disposal of Wastes and Highly Contaminated Soils," called for the removal of all of the designated, contaminated material from the drum storage area. All contaminated wastes were to be disposed of at a Subtitle C facility in accordance

with RCRA. The interim action itself was deemed to be protective; however, further actions may be necessary in order to fully protect human health and the environment. This will be determined via the subsequent RI/FS, as noted previously.

Alternative DS-2 is the least expensive alternative in terms of present worth costs, and the costs are proportional to its effectiveness. It is also the more expeditious of the two action alternatives, since Alternative DS-3 would have required test burns of one to two years duration to determine its effectiveness. Both action alternatives were preferred over Alternative DS-1, "No Action," in terms of protection of human health and the environment.

APPENDIX 1

TABLES

TABLE 1

CONCENTRATION OF CONTAMINANTS DETECTED IN WASTE SAMPLES

CONTAMINANT NAME	TYPE	W-1 WASTE WATER (ug/l)	W-2 WASTE SLUDGE (ug/kg)
Vinyl Chloride	V	168	
Acetone	V	74888	
1,1-Dichloroethane	V	98	
Trans-1,2-Dichloroethene	V	8888	
2-Butanone	V	558	768873
1,1,1-Trichloroethane	V	778	
Trichloroethene	V	528	
Benzene	V		148873
2-Hexanone	V	538	
4-Methyl-2-Pentanone	V		2788
Toluene	V	628	76888
Ethylbenzene	V	69	4686
Total Xylenes	V	94	24,888
4-Methylphenol	S	148	
2,4-Dimethylphenol	S	428	
2-Methylnaphthalene	S		88,988
Fluorene	S		25,888
Fluoranthene	S		57883
Chrysene	S		17,8883
Di-n-Octyl Phthalate	S		16883
Endosulfan II	P	.88J	
4,4-DDD	P	.89J	
Endrin Ketone	P	.81J	
Aluminum	M	R	R
Arsenic	M	5E	
Barium	M	588	
Beryllium	M	[4]	
Cadmium	M	7	
Calcium		385,888	[444.4]
Chromium	M	R	
Cobalt	M	46	
Copper	M	388	
Cyanide	M	14J	8.1J
Iron	M	R	1276.2
Lead	M	R	R
Magnesium	M	194,888	[444.4]
Manganese	M	3251	37.2
Nickel	M	468	11.1
Potassium	M	6418	
Selenium	M	5E	R
Sodium	M	68,888	
Thallium	M	R	
Vanadium	M	293	16*J
Zinc	M	R	14.7*J

If the result is a value greater than or equal to the instrument detection limit but less than the contract-required detection limit, the value is reported in brackets (i.e.,[10]).

B = analyte found in blank as well as sample

E = indicates an estimated value or not reported due to the presence of interference

R = data validation recommends value to be rejected

J = data validation recommends value to be designated as "estimated"

* = indicates duplicate analysis is not within control limits

V = volatile

S = semi-volatile

P = pesticide

TABLE 2

ANALYSIS OF WASTE IN STORAGE TANK

UPSTATE LABORATORIES, INC.

Analysis Results
Report Number 31386010
March 13, 1986

Fourth Coast I.D.: Sealand Site Sample No. #03

ULI I.D.: 03386021

Parameters	Results
pH	7.0
Specific Gravity	0.886
Sulfide *	--
Total Phenols	17 ppm
Total Phosphorus	3.0 ppm
Total Volatile Solids	98%
Total Solids	83%
% Ash	1.7%
Total Chloride	1300 ppm
% Sulfur	0.25%
% Oil and Grease	>50%
Total Chromium	<25 ppm
Total Copper	40 ppm
Total Nickel	210 ppm
Total Cadmium	2 ppm
Total Lead	13 ppm
Total Silver	<10 ppm
Total Zinc	44 ppm
Total Antimony	<30 ppm
Total Mercury	<0.1 ppm
Total Barium	<60 ppm
Total Selenium	0.2 ppm
Total Arsenic	<1 ppm
Total Cobalt	<10 ppm
Benzene	<20 ppm
Toluene	<20 ppm
Ethylbenzene	<20 ppm
Xylenes	<20 ppm
Methyl Ethyl Ketone	<20 ppm
Methyl Isobutyl Ketone	<20 ppm
Acetone	<20 ppm
Chloromethane	<20
Bromomethane	<20
Dichlorodifluoromethane	<20
Vinyl Chloride	<20
Chloroethane	<20
Methylene Chloride	<20
Trichlorofluoromethane	<20
1,1-Dichloroethylene	<20
1,1-Dichloroethane	<20
t-1,2-Dichloroethylene	<20
Chloroform	<20
1,2-Dichloroethane	<20
1,1,1-Trichloroethane	<20
Carbon Tetrachloride	<20
Bromodichloromethane	<20
1,2-Dichloropropane	<20
t-1,3-Dichloropropylene	<20
Trichloroethylene	<20
Dibromochloromethane	<20
1,1,2-Trichloroethane	<20
c-1,3-Dichloropropylene	<20
2-Chloroethylvinyl ether	<200
Bromoform	<200
1,1,2,2-Tetrachloroethane	<20
Tetrachloroethylene	<20
Chlorobenzene	<20
Trichlorotrifluoroethane	<20

All results are expressed as ppm.

PCB CONCENTRATION (ppm)						
1221	1016	1242	1248	1254	1260	TOTAL
		8			6	14

TABLE 3
ANALYSIS OF WASTE IN TANKER-TRAILER
OCTOBER, 1986

UPSTATE LABORATORIES, INC.

Analysis Results
Report Number 102986012
Date: October 29, 1986

Client I.D.: St. Lawrence County - Sealand Restoration Site
Town of Lisbon
Sample #86-09-05

ULI I.D.: 25086001

Parameters	Results
pH	6.0 *
Specific Gravity	1.0606
Total Phenols	41
Total Volatile Solids	96% of TS
Total Solids	92%
% Ash	2%
% Sulfur	0.72%
Total Chloride	<400
Oil and Grease	92% of TS
Methyl Ethyl Ketone	<10
Methyl Isobutyl Ketone	<10
Acetone	<10
Total PCB's	<2 mg/kg
Total Arsenic	0.24
Total Barium	26
Total Cadmium	0.18
Total Chromium	3.9
Total Copper	19
Total Cobalt	1.2
Total Lead	8.8
Total Nickel	1.6
Total Selenium	0.013
Total Silver	0.20
Total Zinc	7.1
Total Antimony	5.6
Total Mercury	0.21
EPA 601:	
Chloromethane	<10
Bromomethane	<10
Dichlorodifluoromethane	<10
Vinyl Chloride	<10
Chloroethane	<10
Methylene Chloride	<10
Trichlorofluoromethane	<10
1,1-Dichloroethylene	<10
1,1-Dichloroethane	<10
t-1,2-Dichloroethylene	<10
Chloroform	<10
1,2-Dichloroethane	<10
1,1,1-Trichloroethane	<10
Carbon Tetrachloride	<10
Bromodichloromethane	<10
1,2-Dichloropropane	<10
t-1,3-Dichloropropylene	<10
Trichloroethylene	<10
Dibromochloromethane	<10
1,1,2-Trichloroethane	<10
c-1,3-Dichloropropylene	<10
1,1,2,2-Tetrachloroethane	<10
Tetrachloroethylene	<10
Bromoform	<10
2-Chloroethylvinyl ether	<10
EPA 602 (including Xylenes):	
Benzene	<10
Toluene	<10
Ethylbenzene	<10
Xylenes	<10
Halogenated Aromatics (601/602):	
Chlorobenzene	<10
1,2-Dichlorobenzene	190
1,3-Dichlorobenzene	<10
1,4-Dichlorobenzene	210

All results are expressed as ppm unless otherwise stated.
* pH results are expressed as Standard Units.

SLD 001 1224

APPENDIX 2

FIGURES

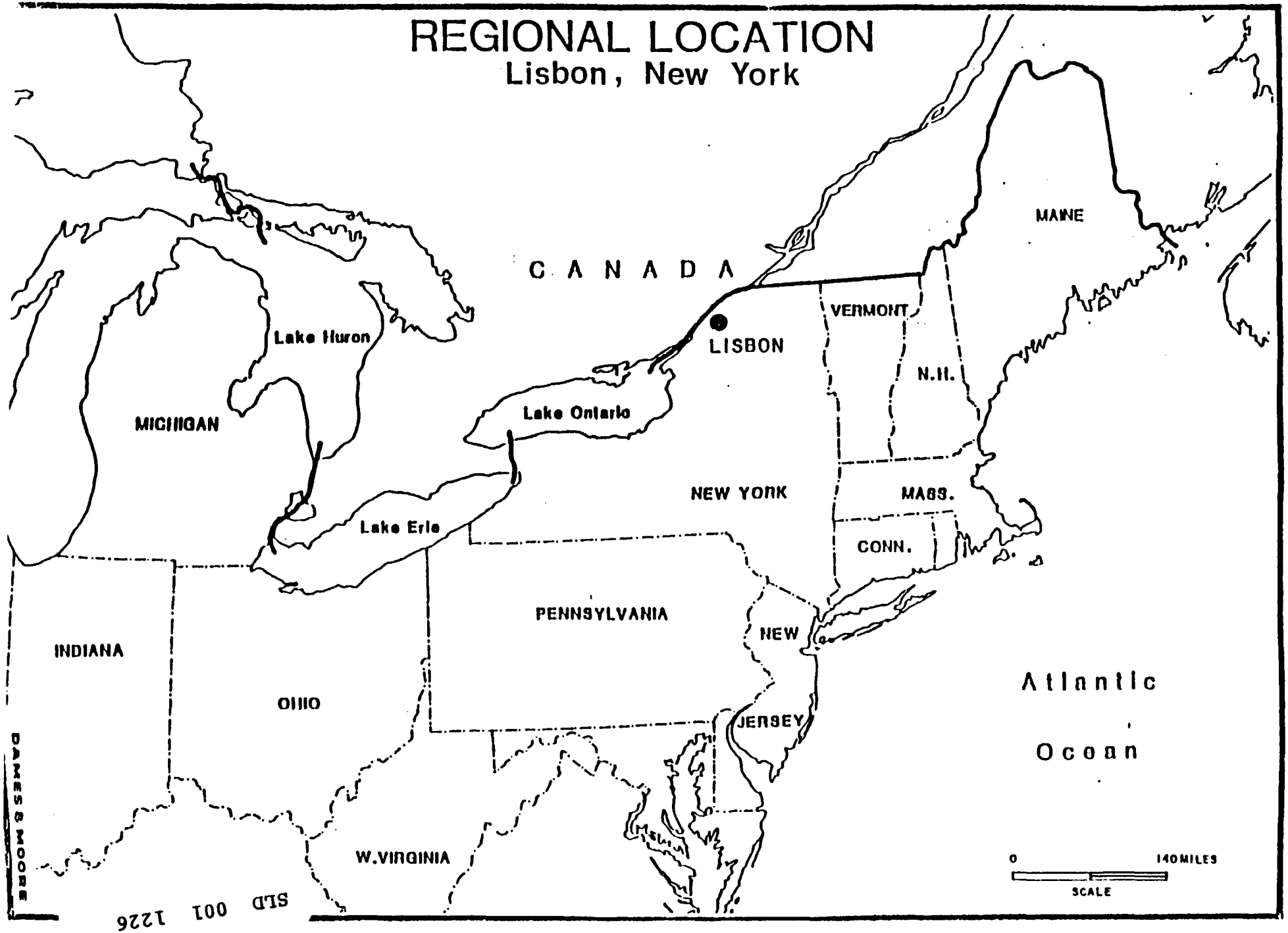

REGIONAL LOCATION
Lisbon, New York
CANADA
MAINE
VERMONT
LISBON
N.H.
Lake Huron
MICHIGAN
Lake Ontario
NEW YORK
MASS.
Lake Erie
CONN.
PENNSYLVANIA
NEW
INDIANA
OHIO
JERSEY
Atlantic
Ocean
W.VIRGINIA
0
140 MILES
SCALE
DAMES & MOORE
SLD 001 1226

Figure 1

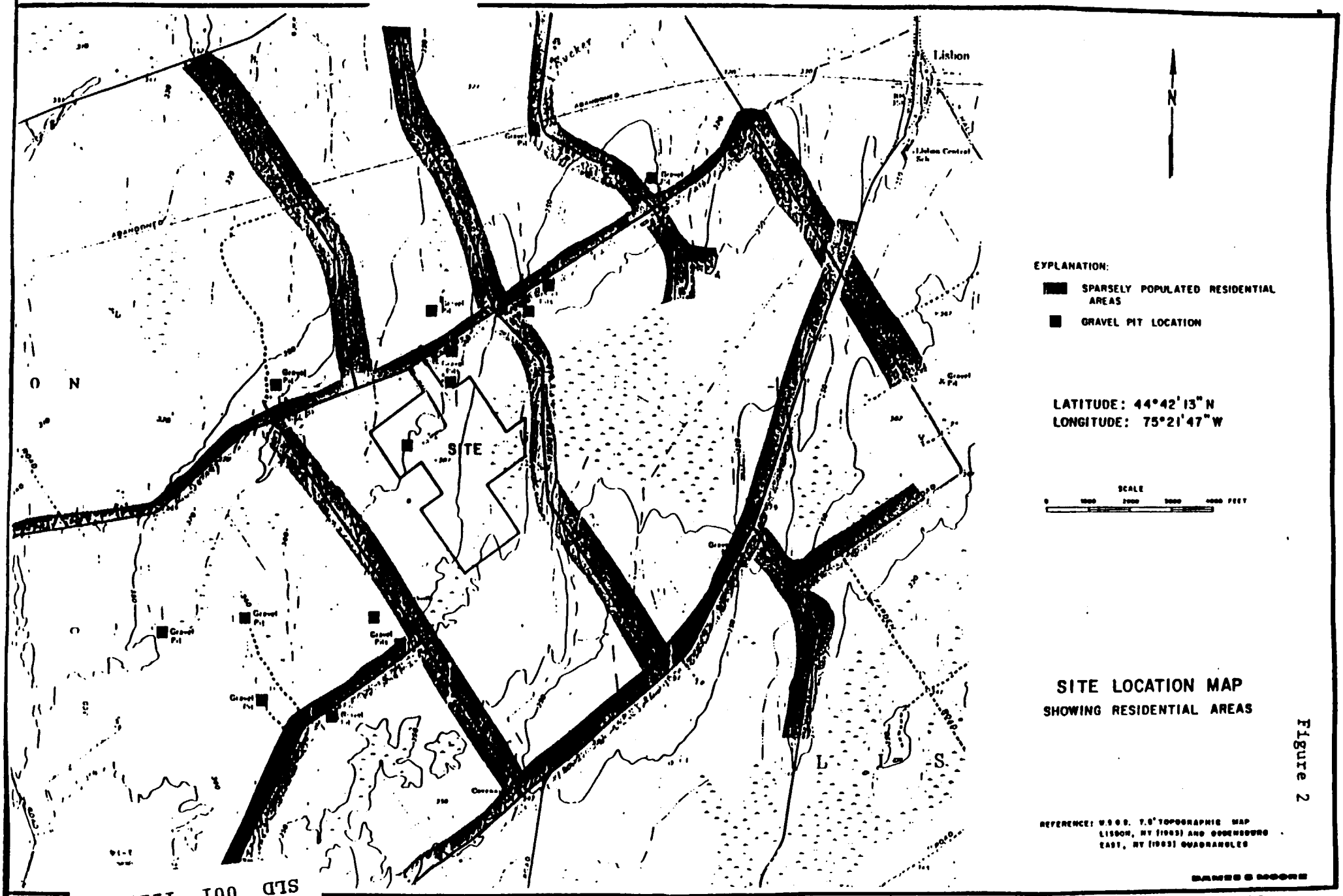


FIGURE 1-2

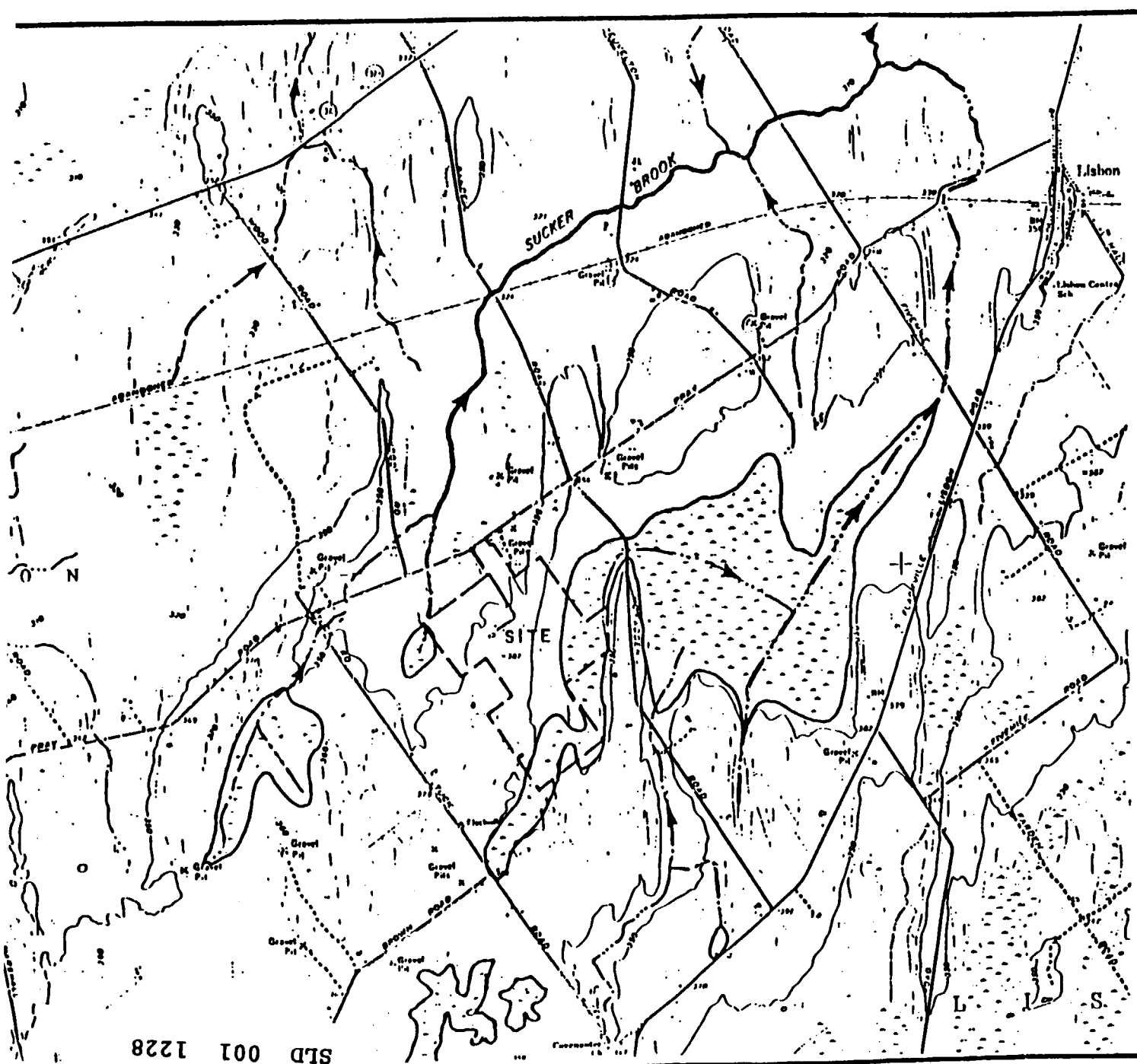
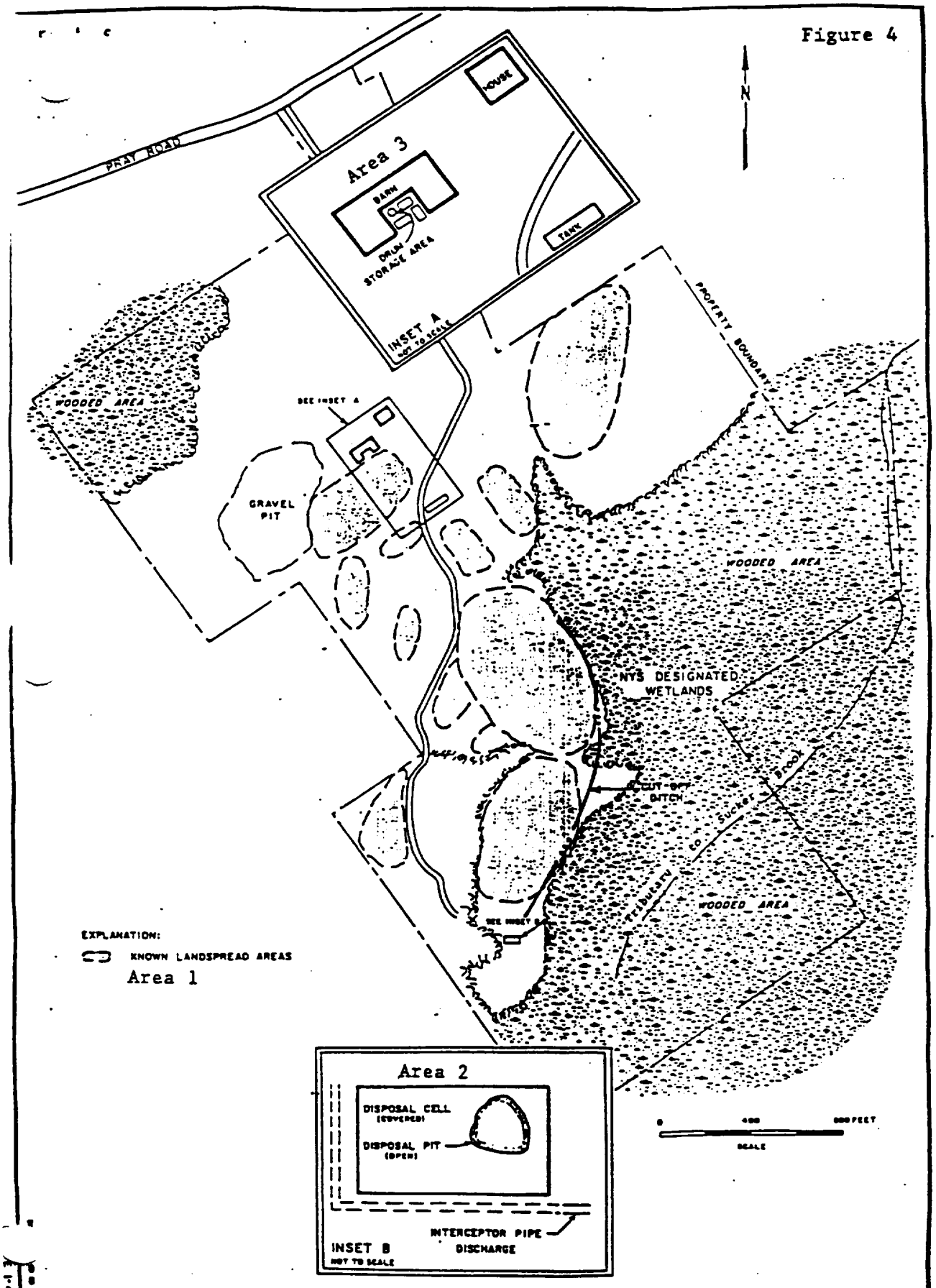

SUCKER BROOK
Lisbon
SITE
N
SCALE
LATITUDE: 44°42'13" N
LONGITUDE: 75°21'47" W
SITE LOCATION MAP
SHOWING SURFACE WATER LOCATIONS
Figure 3
REFERENCE: U.S.G.S. 7.5' TOPOGRAPHIC MAP
LISBON, NY (1963) AND OGDENSBURG
EAST, NY (1963) QUADRANGLES
FIGURE 1-3

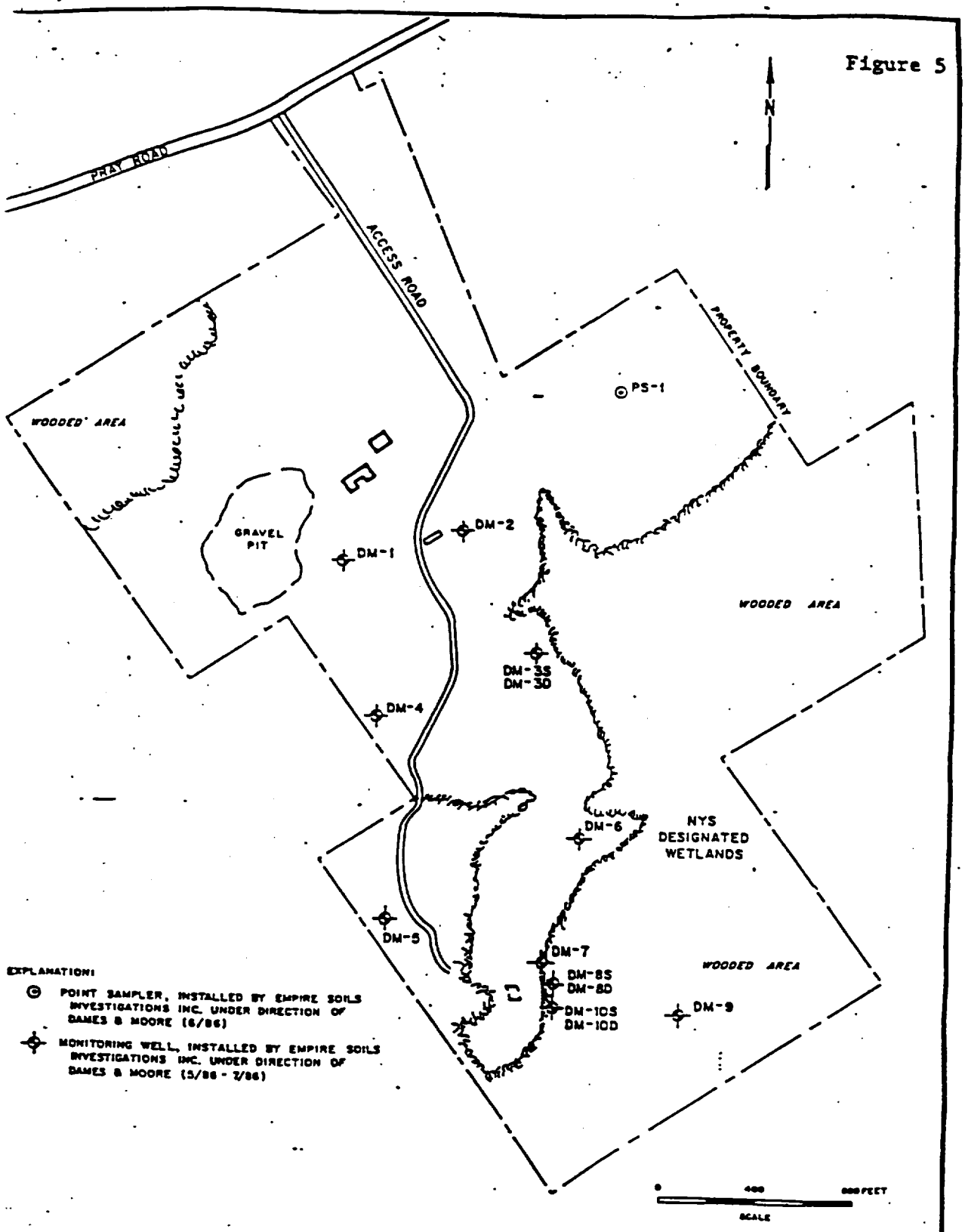
Figure 4



ON-SITE
DISPOSAL AREAS

SLD 001 1229

Figure 5



MONITORING WELLS
GROUNDWATER SAMPLING LOCATIONS
1986 INSTALLATIONS

FIGURE

SLD 001 1230

APPENDIX 3 - ADMINISTRATIVE RECORD INDEX

Document Number: SLD-001-0001 To 0107 Date: 06/11/86

Title: Sealand Restoration Site Remedial Investigation and Feasibility Study Quality Assurance Plan

Type: PLAN
Author: none: Dames & Moore
Recipient: none: NY Dept of Environmental Conservation

Document Number: SLD-001-0108 To 0140 Date: 12/20/85

Title: Sealand Restoration Site Remedial Investigation and Feasibility Study Health and Safety Plan

Type: PLAN
Author: Keefe, Larry: Dames & Moore
Recipient: none: NY Dept of Environmental Conservation

Document Number: SLD-001-0141 To 0163 Date: 08/09/90

Title: (Letter of Transmittal forwarding attached 1984 work manifests and test results for drums removed from the site)

Type: CORRESPONDENCE
Author: Zimmerman, Keith: St Lawrence NY, County of
Recipient: Munes, Robert: US EPA

Document Number: SLD-001-0164 To 0192 Date: 07/24/90

Title: (Letter of Transmittal forwarding attached drum sampling results and manifests/bills for materials removed in 1987-1989 from the site)

Type: CORRESPONDENCE
Author: Zimmerman, Keith: St Lawrence NY, County of
Recipient: Munes, Robert: US EPA

Document Number: SLD-001-0193 To 0251 Date: / /

Title: Sealand Restoration Site Remedial Investigation and Feasibility Study Work Plan

Type: PLAN
Author: none: Dames & Moore
Recipient: none: NY Dept of Environmental Conservation

Document Number: SLD-001-0252 To 0480 Date: 09/01/86

Title: Final Report: Engineering Investigations at Inactive Hazardous Waste Sites in the State of New York - Phase II Investigations - Sealand Restoration Site

Type: PLAN
Author: none: Dames & Moore
Recipient: none: NY Dept of Environmental Conservation

Document Number: SLD-001-0481 To 0738 Date: / /

Title: Sealand Restoration Site Remedial Investigation and Feasibility Study, Volume I of II: Report

Type: PLAN
Author: none: Dames & Moore
Recipient: none: NY Dept of Environmental Conservation
Attached: SLD-001-0739

Document Number: SLD-001-0739 To 1085 Parent: SLD-001-0481 Date: / /

Title: Sealand Restoration Site Remedial Investigation and Feasibility Study, Volume II of II: Appendices

Type: PLAN
Author: none: Dames & Moore
Recipient: none: NY Dept of Environmental Conservation

Document Number: SLD-001-1087 To 1088 Date: 08/15/90

Title: (Letter forwarding documents for the EPA checklist of Administrative Record Compilation)

Type: CORRESPONDENCE
Condition: MISSING ATTACHMENT
Author: Hill, Douglas: NY Dept of Environmental Conservation
Recipient: Nunes, Robert: US EPA

Document Number: SLD-001-1089 To 1089 Date: 11/15/88

Title: (Memo recommending that the contract be awarded to Sevenson Environmental Services, for Alternate 2, off site incineration)

Type: CORRESPONDENCE
Condition: MARGINALIA; MISSING ATTACHMENT
Author: O'Toole, Michael J Jr: NY Dept of Environmental Conservation
Recipient: Sullivan, Edward O: NY Dept of Environmental Conservation

Document Number: SLD-001-1090 To 1091 Date: 11/15/88

Title: (Memo summarizing bids received for removal project, and recommending that the contract be awarded to Sevenson for Alternate 2, off site incineration)

Type: CORRESPONDENCE
Condition: MISSING ATTACHMENT
Author: Sullivan, Edward O: NY Dept of Environmental Conservation
Recipient: Jorling, Thomas C: NY Dept of Environmental Conservation

---

Document Number: SLD-001-1092 To 1093 Date: 08/26/88

Title: (Memo regarding Conceptual Contract Approval for Sealand Restoration)

Type: CORRESPONDENCE
Condition: MARGINALIA
Author: Rockmore, Alan: NY Dept of Environmental Conservation
Recipient: O'Toole, Michael J Jr: NY Dept of Environmental Conservation

---

Document Number: SLD-001-1094 To 1102 Date: / /

Title: Sealand Restoration Site Evaluation of Removal Project Bids

Type: FINANCIAL/TECHNICAL
Author: none: NY Dept of Environmental Conservation
Recipient: none: none

Document Number: SLD-001-1103 To 1119 Date: 01/11/89

Title: (Memo forwarding attached final Citizen Participation Plan and the information sheet and agenda for an upcoming public information meeting)

Type: CORRESPONDENCE
Author: Slack, Joseph L: NY Dept of Environmental Conservation
Recipient: Rockmore, Alan: NY Dept of Environmental Conservation

Document Number: SLD-001-1120 To 1122 Date: 06/04/90

Title: (Memo forwarding attached revised Public Information Sheet)

Type: CORRESPONDENCE
Author: Van Hoesen, James: NY Dept of Environmental Conservation
Recipient: Nevin, Charles D: NY Dept of Environmental Conservation

---

Document Number: SLD-001-1123 To 1128 Date: 08/05/87

Title: Sealand Restoration Site Public Informational Meeting (presentation)

Type: PLAN
Author: Curtis, David J: NY Dept of Environmental Conservation
Recipient: none: none

Document Number: SLD-001-1129 To 1132 Date: 07/10/87

Title: (Memo stating that a public informational meeting is required, and forwarding attached proposed agenda and participant list)

Type: CORRESPONDENCE
Author: Ricotta, Frank T: NY Dept of Environmental Conservation
Recipient: Nevin, Charles D: NY Dept of Environmental Conservation

---

Document Number: SLD-001-1133 To 1133 Date: 03/29/89

Title: (Memo regarding press release announcing the award of a contract for drum and soil excavation removal and disposal to Sevenson Environmental Services)

Type: CORRESPONDENCE
Author: Rockmore, Alan: NY Dept of Environmental Conservation
Recipient: Nevin, Charles D: NY Dept of Environmental Conservation
Attached: SLD-001-1134

Document Number: SLD-001-1134 To 1134 Parent: SLD-001-1133 Date: 09/28/89

Title: (NYSDEC Region 6 News Release stating that a public meeting will be held 10/19/89 to discuss the ongoing remediation work being done at the site)

Type: CORRESPONDENCE
Author: Nevin, Charles D: NY Dept of Environmental Conservation
Recipient: none: none

Document Number: SLD-001-1135 To 1135 Date: / /

Title: (Letter transmitting additional relevant records and the draft ROD for the Sealand Site)

Type: CORRESPONDENCE
Condition: MISSING ATTACHMENT
Author: Lupe, Raymond E: NY Dept of Environmental Conservation
Recipient: Pavlou, George: US EPA
Attached: SLD-001-1136 SLD-001-1137 SLD-001-1138 SLD-001-1153

Document Number: SLD-001-1136 To 1136 Parent: SLD-001-1135 Date: 03/30/88

Title: (Letter stating that due to current budget restrictions and limitations, no action will be taken at the site in FY 88 and no individual will be assigned to the project)

Type: CORRESPONDENCE
Author: Luftig, Stephen D: US EPA
Recipient: O'Toole, Michael J Jr: NY Dept of Environmental Conservation

---

Document Number: SLD-001-1137 To 1137 Parent: SLD-001-1135 Date: 06/09/88

Title: (Memo acknowledging concurrence with the recommendation that the site be remediated through State Superfund)

Type: CORRESPONDENCE
Condition: MARGINALIA
Author: Bifera, Frank V: NY Dept of Environmental Conservation
Recipient: Slack, Joseph L: NY Dept of Environmental Conservation

---

Document Number: SLD-001-1138 To 1152 Parent: SLD-001-1135 Date: 08/04/88

Title: (Memo describing the site, summarizing discussions since 07/29/88, and presenting recommendations relative to removal of remaining wastes at the site; materials attached)

Type: CORRESPONDENCE
Condition: MARGINALIA
Author: Slack, Joseph L: NY Dept of Environmental Conservation
Recipient: O'Toole, Michael J Jr: NY Dept of Environmental Conservation

Document Number: SLD-001-1153 To 1201 Parent: SLD-001-1135 Date: 08/15/88

Title: (Memo describing the site remedial construction project, summarizing staff discussions regarding remediation, and presenting complex questions requiring upper management decisions; materials attached)

Type: CORRESPONDENCE
Author: O'Toole, Michael J Jr: NY Dept of Environmental Conservation
Recipient: Sullivan, Edward D: NY Dept of Environmental Conservation

APPENDIX 4 - NYSDEC LETTER OF CONCURRENCE

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233 -7010

Thomas C. Jorling
Commissioner

TELEX

SEP 27 1990

Mr. Bob Nunes
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

Dear Mr. Nunes:

RE: Sealand USEPA ROD
Site #654014

The following paragraph describing site risk associated with the cell disposal area at the Sealand Restoration Site. It is provided following our conversation on September 27, 1990 for revision of the USEPA Sealand ROD.

Cell Disposal Area

The hazardous waste present in the cell disposal area posed the risk of adversely affecting public health and the environment. Human health could have been potentially impacted by ingestion of or dermal contact with surfical tar, liquids or drum contents. In addition, the potential inhalation of harmful dust or vapors from the cell disposal area existed. The potential migration of contaminated groundwater to drinking water aquifers could present additional human health risk in the form of ingestion of contaminated drinking water or dermal contact with water used for domestic purposes. Groundwater contaminant migration would also pose environmental health risk to the downgradient wetlands and ultimately, Sucker Brook, a pike spawning ground. Aquatic life, animals and birds inhabiting the wetlands, would be impacted in the event of such migration.

Please do not hesitate to call me if you have any questions at (518) 457-5677.

Sincerely,

Douglas R. Hill

Douglas R. Hill
Environmental Engineer
Central Remedial Projects Section
Bureau of Eastern Remedial Action (A)
Division of Hazardous Waste Remediation

SLD 001 1239

APPENDIX 5-RESPONSIVENESS SUMMARY

RESPONSIVENESS SUMMARY

SEALAND RESTORATION SITE
Lisbon, N.Y.
September 1990

The U.S. Environmental Protection Agency (EPA) conducted a public comment period from August 24, 1990 through September 24, 1990 for interested parties to comment on the remedial plan selected and implemented by the State for the Sealand Restoration site. Information describing that plan and the other alternatives considered was distributed to 61 individuals and companies and placed in repositories at the following locations: Lisbon Town Hall;, NYSDEC, 50 Wolf Road, Albany, New York; USEPA, 26 Federal Plaza, New York, New York. EPA received three written comments during the comment period. Comments were received from the Ford Motor Company, the General Motors Company, and the New York Power Authority.

The comments have been summarized and are presented in this section. EPA responses to the comments are also provided.

Q: All three commenters objected to the use of a "Proposed Plan" for the purpose of approving past response actions, including the past expenditure of funds. One commenter asserted that the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Section 117, which provides for the issuance of a Proposed Plan "before adoption of any plan for remedial action to be undertaken..." does not contemplate the use of a Proposed Plan in connection with making a determination of whether or not the State or any other party is entitled to reimbursement for response costs it has incurred. Another commenter stated that EPA is choosing alternatives in order to justify passing the costs of such investigations and remedial activities to those claimed to be liable under CERCLA, and states that such procedure is not in conformance with CERCLA, the National Contingency Plan (NCP) or other applicable law or regulations.

A: Although the document EPA distributed to the 61 parties in August, 1990 was titled "Proposed Plan", in fact the proposed plan for this site was prepared by NYSDEC in 1987; the RI/FS, which identified the Preferred Remedial Alternatives. The Preferred Remedial Alternatives were submitted for public review and comment in August of 1987 and were subsequently selected and implemented by the State and the County. The purpose of this ROD is to set forth EPA's reasons for concluding that NYSDEC's selection of that proposed plan was

appropriate pursuant to the requirements of CERCLA and the NCP. Since some of the 61 parties may be PRPs liable for any costs incurred by EPA in connection with response action at the Sealand site, EPA undertook to inform those parties of the proposed plan, the alternatives considered, and EPA's evaluation thereof. EPA also solicited comments form these parties concerning that proposed plan. Section 104(c)(5)(B) of CERCLA clearly grants the president the authority to credit a state for remedial action costs incurred by the State which are reasonable, documented, and direct out-of-pocket expenditures, and which were funded prior to listing of the facility on the National Priorities List (NPL).

To determine if the remedial actions conducted at the Sealand Restoration site were reasonable, the EPA needs to determine if the remedy selection process was carried out in accordance with the requirements of CERCLA, and to review the engineering components and remediation goals of the selected remedy. The Agency also needs to confirm that the public was provided with an adequate opportunity to review and comment on the proposed remedial plan prior to its implementation. Finally, it is appropriate for the Agency to provide the public with a consolidated source of information about the history, characteristics, and risks posed by the conditions at the site, cleanup alternatives considered, their evaluation, and the rationale behind the selected remedy. As these are normally functions carried out during the development of a Record of Decision (ROD), EPA considers the issuance of this ROD to be an appropriate way to document EPA's findings for this site.

Q: One commenter stated that it is not appropriate to publish a Proposed Plan and solicit comments before any potentially responsible parties (PRPs) have been identified.

A: EPA provided information about the State's proposed remedial plan, and EPA's evaluation thereof, together with information request letters to 61 persons and companies who may be PRPs. Although these recipients did not receive general notice that they are PRPs, there exists sufficient information to warrant the submittal of Request for Information letters. These individuals and companies were given 30 days in which to provide information concerning their actions relating to the Sealand Restoration site and to provide comments to the Agency on the remedial plan carried out at the site by the State.

Q: One commenter objected to running of the comment period concurrently with the period during which the same persons are also required to respond to Requests for Information under Section 104(e).

A: EPA's position is that it is neither unreasonable nor inappropriate to require parties to answer requests for information and solicit public comments concurrently. Furthermore, EPA has granted all requests for extensions of the time period in which to respond to the Section 104(e) Request for Information.

Q: All three commenters objected to the denial by EPA of requests to extend the public comment period. One commenter wished to register its strong objection to the refusal of EPA to extend the comment period as requested in a September 13, 1990 letter to EPA, and considered the refusal to extend the comment period to constitute arbitrary and capricious action by EPA. This commenter stated that it reserves the right to submit future comments as information becomes available concerning the site. Another commenter stated that the 30-day comment period does not offer sufficient time to evaluate a program that has been proceeding for several years without public input.

A: The NCP allows for extensions of public comment periods if timely requests are submitted. The NCP indicates that timely requests are generally within the first 2 weeks of the comment period. Since both requests were received after the passage of the first 2 weeks, they were not considered timely, and were, therefore, denied. As for additional comments received after the close of the public comment period, EPA will consider those comments with respect to subsequent work to be conducted at the site.

The assertion that the 30-day comment period is not sufficient to evaluate a program that has been proceeding without public input is not justified. The New York State Department of Environmental Conservation (NYSDEC) has solicited community participation throughout the history of the site. The remedial investigation/feasibility study (RI/FS) report for the Sealand Restoration site, including the States proposed remedial plan was made available to the public from August 5, 1987 to September 4, 1987 in the NYSDEC Albany office and the NYSDEC Regional Office located in Watertown, New York, and at the St. Lawrence County Planning Board office, Canton; Public Library, Ogdensburg; and Town Clerk's Office, Lisbon. A public meeting was held on August 5, 1987 at the Lisbon Town Hall to report the results of the RI performed at the site, describe the basis for the proposed remedial clean-up plan, and receive public input on the alternatives considered. Subsequent public meetings were held on February 14, 1989 and October 19, 1989. At the February meeting, discussions were held on implementation and time schedules for excavation and disposal of buried drums and contaminated soil from the cell disposal area. At the October meeting, information on the progress of the site clean-up was provided.

Q: One commenter stated that the information in Tables 1 and 2 did not indicate that the wastes were "hazardous wastes" under 40 CFR 261. The commenter also stated that because Table 2 indicated total concentrations and not extraction procedure (EP) toxicity concentrations, the wastes were not hazardous wastes.

A: The commenter misinterpreted the text in the document EPA distributed to the 61 parties to mean that the information in Table 2 referred to EP toxicity concentrations and not total concentrations. The commenter is correct to indicate that Table 2 shows total concentrations and not EP toxicity concentrations. More to the point, however, the wastes found at the site do contain hazardous substances as that term is used in CERCLA. Both Tables 1 and 2 as well as indicate the presence of specific compounds in both the cell disposal and drum storage areas which are spent solvents and therefore are Resource Conservation and Recovery Act (RCRA) hazardous wastes as per 40 CFR 261. All compounds which are listed hazardous under RCRA are also hazardous substances under CERCLA.

Q: One commenter stated that although groundwater analyses indicated levels of some chemicals above drinking water standards, the levels were not compared to background levels. The commenter adds that without a comparison to background levels, any conclusions that the groundwater was "contaminated" would have been premature.

A: The commenter's assertion that background levels were not provided is incorrect. Groundwater flow patterns for the overburden aquifer indicate that monitoring wells DM-1, DM-4, and DM-5, although located within the site boundary, were located upgradient of the cell disposal area. Monitoring well DM-5 was also sufficiently removed from the drum storage area to act as a background well for that location. With the exception of one detection of nickel in monitoring well DM-1, no hazardous substance list (HSL) compounds were found in these wells.

Q: One commenter states that the Proposed Plan contains insufficient technical data to determine whether or not the interim actions performed were appropriate, cost effective or consistent with the NCP.

A: The documents EPA provided to the 61 parties identify and solicit comment on the preferred alternative for remediating the site or operable unit, and explain the reasons for the preference, and describe other remedial options that were considered. These documents do not include a specific evaluation of alternatives with respect to nine specific criteria, because the proposed plan selected by the NYSDEC

was not intended to be a final, complete remedy for the site. In addition, such a comparative analysis would not assist EPA in approving an action which already has been completed. The actions were considered interim remedial actions and were undertaken to reduce the threat from immediate hazards and to remove the potential sources of contamination present. EPA does consider the actions taken by the NYSDEC to be appropriate, cost effective, and to be consistent with the objectives of the NCP.

Q: One commenter stated that the past actions do not comply with EPA criteria for selecting remedial actions.

A: The criteria employed by NYSDEC included compliance with federal and state regulations, protection of human health and the environment, implementability, cost effectiveness, short-term effectiveness, long-term effectiveness, and community acceptance. The criteria are discussed in detail in the State's RI/FS report prepared by Dames and Moore. EPA considers the criteria utilized by NYSDEC to evaluate the remedial alternatives to have been appropriate.

Q: One commenter stated that the past actions do not meet cleanup standards.

A: As the actions taken were intended to be interim actions only, EPA recognizes that soil, surface water, and ground water cleanup standards must be addressed as part of the final remedy for the site. It is for this reason that confirmatory soil sampling and additional groundwater and surface water sampling are to be conducted as part of the supplemental RI/FS for this site.

Q: One commenter stated that the past actions do not protect human health and the environment.

A: The implemented alternatives for the cell disposal area and drum storage area are protective of human health and the environment. The alternatives specified the removal of drummed wastes and contaminated soils from the disposal cell and drum storage areas and the placement of a cover and cap over the remaining residuals in the cell disposal area. Their implementation resulted in the reduction of the risks associated with direct contact, and minimized the migration of contamination into the groundwater. This resulted in the elimination of a long-term source of existing and potential groundwater and surface water contamination and likely limited the expansion of the contaminated groundwater plume. EPA considers the interim actions taken to be effective in mitigating the risks to public health and the environment associated with the migration of those contaminants off-site.

Q: One commenter stated that the past actions do not meet applicable or relevant and appropriate standards (ARARs).

A: The selection by NYSDEC of off-site incineration as the preferred remedial action in the cell disposal area was considered the most appropriate action to comply with existing ARARs, particularly the RCRA Land Disposal Restrictions (LDR) in 40 CFR 268, since the composition of the waste was known to include spent solvents which are regulated under LDRs. The selection of off-site disposal of excavated soils and wastes from the drum storage area was also conducted to satisfy ARARs.

Q: One commenter stated that the past actions do not provide long-term effectiveness.

A: The implemented remedial actions effectively removed contaminated soils and drummed wastes, thus permanently eliminating a major source of groundwater contamination from the site. Had these measures not been implemented, the contaminants would have continued to migrate and created leachate. The implemented action for the cell disposal area, Alternative CD-4, provided a high degree of effectiveness, since the disposal cell was covered with a multi-layered engineered cap to control the infiltration of rainwater through residual contaminants and to minimize leachate generation. The expected lifetime of the cap is estimated to exceed 30 years. The implemented alternative for the drum storage area, Alternative DS-2, specified off-site treatment and disposal of the excavated materials. This effectively and permanently removed the source of contamination from the site.

Q: One commenter stated that the past actions do not provide short-term effectiveness with respect to hazardous materials transferred to other sites.

A: The interim remedial actions taken at the site included off-site transport and disposal of contaminated soils to a RCRA-permitted facility. Such activities posed some short-term risks of exposure to the community during transportation of the wastes to a treatment facility. However, mitigative measures to reduce the probability of exposure were implemented.

Q: One commenter stated that the past actions do not recognize the preference for onsite treatment.

A: EPA has no policy or guidance recognizing a preference for onsite treatment as opposed to offsite treatment. There is a statutory preference for the treatment of hazardous wastes

to reduce their toxicity, mobility, and volume. The incineration of the hazardous materials from the cell disposal area is consistent with the statutory preference for treatment of hazardous wastes.

Q: One commenter stated that the past actions do not reduce the volume, mobility, or toxicity of the materials.

A: The implemented alternative for the cell disposal area, Alternative CD-4, resulted in significant reductions in the volume and toxicity of the treated material by thermal destruction of the waste. Volatile organic compounds (VOCs) and semi-volatile organics would be removed from the material. Alternative CD-4 reduced the mobility of contaminants by minimizing leachate generation through the construction of a multi-layered cap to control rainwater infiltration.

Q: One commenter stated that past actions are not cost effective.

A: The implemented remedy for the drum storage area, Alternative DS-2, with a present worth cost of $90,000, was the least costly of the drum storage area alternatives. The implemented remedy mitigated site hazards as effectively as the off-site incineration alternative.

The implemented remedy for the cell disposal area, Alternative CD-4, was cost-effective because it provided overall effectiveness proportional to its cost; the net present worth value being approximately $11,928,620. (The final remediation cost was later estimated to be $20 million, due to the additional drums, soil, and water that were found in and removed from the cell.) Although this cost was 40% higher than Alternative CD-5, which included on-site incineration with cover and cap, Alternative CD-5 was not selected due to anticipated community opposition to on-site incineration and the additional time needed for trial-burn testing and regulatory approvals prior to implementation.

Q: One commenter stated that the past actions have not been demonstrated to be acceptable to the community and that EPA assumed what community reaction would be.

A: The implemented alternatives were presented to the community at the public hearing held by NYSDEC on August 5, 1987 and a 30-day public comment period was also provided at that time. A transcript of the public meeting does not indicate any objections by the public concerning the remedial alternatives proposed by NYSDEC. A copy of NYSDEC's written responses to comments is included in this ROD as Appendix 6. EPA was not involved in the assessment of community reaction in 1987. EPA has not received adverse comments from the

community at this time.

Q: One commenter stated that the description of the response actions performed by the NYSDEC and the St. Lawrence County is inadequate.

A: The descriptions provided by EPA of the actions already taken by the State were not intended to provide an exhaustive review of the actions taken, but rather to provide the public with a summary of their scope and results. Further information is available in documents located at the repositories. The NYSDEC will, shortly, be receiving a final remediation report from their consultant concerning the remediation project in the cell disposal area. This report will provide a more comprehensive summary of the project.

Q: One commenter objected to the costs of inspection, investigation, remediation, removal, oversight, or indirect costs of St. Lawrence County.

A: The action undertaken by St. Lawrence County to remove wastes from the drum storage area in 1987-88 was authorized using funds appropriated by the New York State Legislature. The recommendation to remove wastes from this area was specified as the preferred alternative in NYSDEC's RI/FS report. EPA considers all actions taken related to the remediation of the drum storage area were necessary and were beneficial in reducing risks to human health and the environment from exposure to hazardous wastes. EPA has not yet undertaken a review of the State or County expenditures in implementing those actions.

Q: One commenter stated that the past actions taken by the NYSDEC and St. Lawrence County did not address contamination pathways and that further investigation by EPA illustrates the inadequacy of the studies performed in the past by state and county agencies.

A: A baseline human health risk assessment which utilized procedures outlined in the draft Superfund Public Health Evaluation Manual was conducted during the NYSDEC RI/FS. The risk assessment identified contaminants of concern, exposure pathways, media transport routes, and human exposure points. An EPA review of the baseline risk assessment section in the NYSDEC RI/FS report concluded that the document thoroughly discussed all exposure scenarios presented. In the supplemental RI/FS, a baseline human health and environmental risk assessment will be undertaken to determine present risks posed by the site. It should be noted that the NYSDEC action was an interim action which may need to be supplemented by EPA in order to eliminate risks or reduce them to acceptable levels.

Q: One commenter stated that EPA's intention to take confirmatory samples at the site indicates that the past sampling performed by the State and County was inadequate.

A: Confirmatory soil samples will be collected at the site during the supplemental RI/FS so as to supplement the existing data base and to identify current conditions at the site. The data will be compared with soil cleanup action levels to determine if any additional remediation of soils is warranted.

Q: One commenter stated that the disposal of the contaminated soils was not in conformance with Land Disposal Restrictions.

A: Since the wastes present in the cell disposal area were known to contain spent solvents, NYSDEC selected offsite incineration of the excavated soils and wastes from the cell disposal area so as to ensure compliance with the Land Disposal Restrictions.

The disposal of the wastes from the drum storage area were not subject to Land Disposal Restrictions at the time of implementation.

Q: One commenter objected to the costs of public meetings on the grounds that no notice of such public meetings were promulgated or given to the alleged PRPs.

A: The notice of public meeting held on August 5, 1987 was published in the Watertown Daily Times on July 22 and July 25, 1987. The publication of the notice in the local newspaper satisfied public notification requirements of public meetings in accordance with the NCP.

APPENDIX 6 - NYSDEC RESPONSIVENESS SUMMARY

RESPONSIVENESS SUMMARY

SEALAND RESTORATION SITE

REMEDIAL INVESTIGATION/FEASIBILITY STUDY

Town of Lisbon, St. Lawrence County, New York

by the

New York State Department of Environmental Conservation

The New York State Department of Environmental Conservation (NYSDEC) held a Public Informational Meeting on August 5, 1987 at the Lisbon Town Hall to discuss the Sealand Restoration Remedial Investigation/Feasibility Study (RI/FS) performed by Dames and Moore, under contract to the NYSDEC. Present at the meeting were representatives from: NYSDEC, Dames and Moore, New York State Department of Health (NYSDOH), St. Lawrence County, Town of Lisbon, concerned citizens, and the news media.

The Remedial Investigation/Feasibility Study was made available for public review on July , 1987 at the City of Ogdensburg Public Library, the Lisbon Town Hall, the St. Lawrence County Environmental Management Council's Office in Canton, the NYSDEC Region 6 Office and the NYSDEC Central Office. The following is a summary of the questions, comments and responses received during the comment period, either at the public meeting or through correspondence.

QUESTION: Was testing done on various levels in each of the on-site monitoring wells installed during the Remedial Investigation?

RESPONSE: In many locations different levels of the wells were tested. In each well location, Dames and Moore installed a shallow well and Deep well to monitor the upper and lower level. Continuous split spoon samples of the soils were collected during drilling.

QUESTION: Was contamination greater in the shallow or deeper aquifer at the downgradient well locations adjacent to the disposal cell?

RESPONSE: The nature of contamination is different in the differnt levels. In the upper zone, volatile organic contamination was found, while in the lowere zone inorganic metals were observed.

QUESTION: What was the depth of bedrock?

RESPONSE: Bedrock varied with an average depth around 30 feet.

QUESTION: Does the NYSDEC know the extent of contamination at the bottom and sides of the disposal site?

RESPONSE: At this point in time, extent of contamination is unknown directly under the disposal cell. This is the reason that the NYSDEC wants to do a reassessment on the bottom of the cell once excavation is completed. The NYSDEC is hoping for a clean closure. However, this will be based on sampling of the bottom of excavation, its analysis and the reassessment of the trench bottom.

QUESTION: How often will monitoring be accomplished at the site after remediation? Who will fund this monitoring? and, Where would the reports be provided for public information?

RESPONSE: 1. The Environmental Monitoring Program has not been designed to date. The intent would be to perform quarterly monitoring for the first couple of years and then reduced to anual or biannual monitoring depending upon the sample results. Eventually, the decision will be made that the site is cleaned and monitoring will not be necessary.

2. NYSDEC will be responsible for monitoring and the funding associated with this monitoring.

3. In the initial years, there will be a on-going public information process to keep the public informed of site progress. This process may be implemented through keeping the established repository at the Town of Lisbon Town Hall or at the NYSDEC Regional Office.

COMMENT: A local repository would be a benefit for the local residents.

QUESTION: How deep will excavation be accomplished in the empty drum storage area?

RESPONSE: The area is shown as a 25 X 25 X 1 cubic foot area in the RI/FS. Again, the depth of excavation will depend on soil analysis of the bottom of the excavated area.

QUESTION: What is the condition of the drums near the barn area?

RESPONSE: These drums are primarily empty and stored on their sides. The drums are in fairly good condition with only a few showing obvious deterioration.

QUESTION: When is cleanup going to take place?

RESPONSE: The timeschedule depends upon the USEPA decision. The NYSDEC submitted a request for removal action to the USEPA on May 1, 1987. The USEPA may be making this decision by the fall of this year. It looks now that if the USEPA does this removal action, the work will not be started until next Spring. If the USEPA disapproves this action, the NYSDEC would be targeting work as soon as possible , therafter.

QUESTION: Would the money the County received from the NYS Legislature be held back until the USEPA decision is made?

RESPONSE: No. The County has been granted this money through the Local Assistance Grant Program. There has been no contingencies upon EPA's approval. The County is proceeding to engaged a contractor to clean up the empty drum storage area behind the barn.

QUESTION: How fast will the contamination migrate per year from the disposal cell?

RESPONSE: The answer to this question is unknown. Off-site migration depends upon the configurations of soil in the direction of migration. Low levels of contamination have been found in the monitoring wells downgradient. At this point, these levels do not raise a concern in relation to the homeowner wells. A well (well #9) was constructed further downgradient of the disposal cell to address this concern. No detectable organics were observed in this well during the times of sampling.

QUESTION: How much will the cost be for cleanup of the disposal cell?

RESPONSE: The RI/FS Report has documented an estimated cleanup cost to be approximately $2.1 million.

QUESTION: Will the cost for cleanup be higher next year with respect to this year cleanup costs?

RESPONSE: Yes.

QUESTION: How often will wells be monitored around the site?

RESPONSE: The environmental monitoring program will be accomplished after site cleanup. This question has been answered previously and will be dependant upon a design of this program based on reassessments after excavation.

QUESTION: Are the lands now being farmed? Will it be alright to farm the lands?

RESPONSE: The NYSDEC has instructed farmers not to use the land until the RI/FS is completed. NYSDEC was at the site just prior to the information meeting and observed that farmers have taken hay from the front fields. Planting and harvesting of corn has not been performed on-site for the past two years. The NYSDEC study shows low levels of contamination detected in the farmlands. The results were obtained from 40 samples collected throughout the farmlands. Levels of contamination has been reported well below typical landspread application rates. Therefore, as long as levels of contamination are below the typical landspread application rates used for farmlands, farm peration can be performed in all areas except directly over the disposal cell.

QUESTION: Who owns the site?

RESPONSE: The Owner-on-Record in the St. Lawrence County Courthouse is Sealand Restoration, Inc. with a mailing address to Mr. John Fedak, Ogdensburg, New York.

QUESTION: Who is financially responsible?

RESPONSE: The NYSDOL is looking into this matter.

QUESTION: When was Sealand Restoration in operation?

RESPONSE: 1979-80

QUESTION: Is ther any immediate danger in leaving the contamination in the area for another year?

RESPONSE: There is always an imminent danger when drums of contaminates are present and leaking into the environment. There is a definite known release of contaminants identified contaminating the environment. The RI/FS sample analysis show only low level contamination eminating from the site and do not show immediate concerns to private water supplies.

Public Health risks are due primarily to uncontrolled hazards at the site. The remedial actions recommended control these concerns. Migration pathways or flow of contamination off the site is not a main issue. A snow fence and the main gate constructed at the site address these concerns.

QUESTION: How will the NYSDEC know that remediation will be done properly at the site and off-site.

RESPONSE: An on site monitor will be provided at the site during site remediation. Also the NYSDEC/USEPA requires that all TSDF are in compliance with USEPA requirements. Laws are much more stringent during the past few years. Tighter controls have been put into effect and should alleviate this concern.

SEALAND RESTORATION
REMEDIAL INVESTIGATION/FEASIBILITY STUDY

PUBLIC INFORMATIONAL MEETING
AUGUST 5, 1987
7:00 P.M.

ATTENDANCE

	NAME	ADDRESS	AFFILIATION
1.	ANTHONY LABARGE	LISBON, N.Y.	LISBON TOWN SUPERVISOR
2.	STEPHEN WALLACE	LISBON, N.Y.	
3.	GAIL TEELE	LISBON, N.Y.	
4.	RANDALL TEELE	LISBON, N.Y.	
5.	VICTOR E. PISANI	MASSENA,N.Y.	NYSDOH, MASSENA DISTRICT
6.	STEVEN TEELE	LISBON, N.Y.	LISBON/MADRID CO. LEGISLATOR
7.	EDWARD J. KNIGHT	LISBON, N.Y.	
8.	HOLLIS MCBATH	LISBON, N.Y.	
9.	EILEEN MCBATH	LISBON, N.Y.	
10.	LEONA HUTCHISON	RTE 1, OGDENSBURG, N.Y.	
11.	ELENANOR GEARY	MCFADDEN RD., LISBON, N.Y.	
12.	JOHN SHEEHAN	WATERTOWN, N.Y.	WATERTOWN DAILY TIMES
13.	BETSY KAPLAN	POTSDAM, N.Y.	SENATOR MCHUGH's OFFICE
14.	WILLIAM BARTLETS	LISBON, N.Y.	
15.	EVERETT THOMPSON	RTE 2, BOX 323, LISBON, NEW YORK	
16.	WILLIAM P. FIENAN	WADDINGTON, N.Y.	
17.	SANDY D. SAHIO	BATAVIA, N.Y.	
18.	TIM FLACK	LISBON, N.Y.	
19.	MARY LOGAN	BOX 185, WADDINGTON, N.Y.	
20.	WINIFRED VEITCH	RTE 1, WADDINGTON, N.Y.	
21.	RITA MARTIN	LISBON, N.Y.	
22.	DEMETRA HURST	LISBON, N.Y.	
23.	ARTHUR HURST	LISBON, N.Y.	

24.	*JON MONTAN	CANTON, N.Y.	ST. LAWRENCE COUNTY EMC
25.	KEITH ZIMMERMAN	CANTON, N.Y.	ST. LAWRENCE COUNTY EMC
26.	*ALAN GOGAN-TILSTONE	BALDWINSVILLE, N.Y.	DAMES & MOORE
27.	*FRANK T. RICOTTA	ALBANY, N.Y.	NYSDEC, DSHW-BERA
28.	*DAVID J. CURTIS	ALBANY, N.Y.	NYSDEC, DSHW-BERA
29.	JEFF TRAD	ALBANY, N.Y.	NYSDEC, DSHW-BERA
30.	*JOHN KENNA	WATERTOWN, N.Y.	NYSDEC, REGION 6
31.	*RONALD HEERKENS	SYRACUSE, N.Y.	NYSDOH, SYRACUSE REGION
31.	PAMELA MORELY	CANTON, N.Y.	COURT STENOGRAPHER

* PANEL MEMBERS