



## **RE: Draft Remedial Design Work Plan**

CCE appreciates the compilation of the extensive work that must be completed to remediate the Onondaga Lake bottom. CCE offers the following recommendations to the final version of the RDWP:

1. In CCE's 2005 comments on the PRAP, CCE echoed the comments of Atlantic States Legal Foundation's request for Honeywell to develop "detailed matrix to be prepared that clearly defines all of the subsites for the Onondaga Lake Superfund Site with the schedules, remedies, technical contact people, etc." which would also integrate all known or suspected sources of contaminants of concern or CPOI, including, but not limited to discharges from Metro, atmospheric deposition, non-point source pollution, and contaminated groundwater. CCE believes section 4.4, the schedule, provides major milestones and dates is a general skeleton for this matrix and that additional information as stated previously should be integrated in a public friendly manner.
2. Monthly progress reports (section 5.2 Project communication) are required to be submitted to agencies and persons of distribution lists as outlined in the Consent Decree. CCE believes the public, and at a minimum, CPWG members have access to the monthly reports.
3. When will the **Community Health and Safety Plan (CHASP)** be developed and released? Developed and designed to protect workers and neighbors during remediation activities, CCE believes this document must be subject to public review. In conversations with the Department, it was understood that the Community HASP would be available for public review, but the public may not necessarily be afforded an opportunity to comment on it. CCE believes that at least, the CPWG as a public body should be given the opportunity to provide comment in an open and meaningful way.
4. **Remedial Action Contingency Plan.** The Consent Decree called for the development of the Remedial Action Contingency Plan. Recognizing that many things can change during this long and complicated remedy, understanding the contingency plan is important. Again, in conversations with the Department, it was unclear if the public would have an opportunity to review and comment on the RACP and it was unclear in the DRDWP when and how the RACP would be completed. At a minimum, CCE believes that at least, the CPWG should be given an opportunity to review and comment on the RACP. Specifically CCE requests the RACP include details on what will trigger additional clean up, public notification processes, and changes to remediation standards and goals.
5. **Web-based repository.** In addition to notifying existing parties, all documents, notifications, reports, newsletters, historical documentation,

relevant scientific studies and other pertinent information should be readily available on the internet for all to access.

### **General Comments**

Onondaga Lake should have signage in popular public access points to educate the public on the lake's history, current progress, and fish consumption advisories, and resources for more information, such as the DEC or the Onondaga Lake Partnership (OLP). **CCE recommends the State should require Honeywell to finance educational signage—developed by a third party—to be sited at popular public access points.**

**CCE believes Onondaga Lake remediation discussions and actions need to be part of a coordinated public education effort that will inform individuals about the safety of using the lake for common recreational activities such as fishing, consuming fish, wading, swimming, and boating.** The extensive mercury contamination in Onondaga Lake warrants aggressive public education efforts concerning fish consumption. CCE understands that this is a long term goal and that public education and outreach efforts about the risks to human health from consuming Onondaga Lake fish needs to be a critical part of the remediation plan to protect human health.