

COMMUNITY RELATIONS PLAN FOR THE LINDE FUSRAP SITE

TONAWANDA, NEW YORK

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Prepared by the

UNITED STATES ARMY CORPS OF ENGINEERS

Buffalo District

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ACRONYMS

BFI	Browning-Ferris Industries
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CANIT	Coalition Against Nuclear Materials in Tonawanda
COCs	Constituents of Concern
F.A.C.T.S.	For a Clean Tonawanda Site
DOE	Department of Energy
EPA	Environmental Protection Agency
FUSRAP	Formerly Utilized Sites Remedial Action Program
GLU	Great Lakes United
MED	Manhattan Engineer District
RI/FS - EIS	Remedial Investigation/Feasibility Study - Environmental Impact Statement
USACE	United States Army Corps of Engineers

1.0 Overview of the Community Relations Plan

The United States Army Corps of Engineers (USACE), Buffalo District has designed this Community Relations Plan for the Linde Formerly Utilized Sites Remedial Action Program (FUSRAP) Site and its designated vicinity properties. The purpose of this plan is to facilitate communication between the Tonawanda community, property owners, employees and tenants of Praxair, Inc., Holmes Elementary School, and U.S. Army Corps of Engineers during the remedial action to be performed at the site. It has been prepared to guide the U.S. Army Corps of Engineers, Buffalo District in proceeding with a community relations program tailored to the needs of the community.

Federal regulations require that during a remedial action Federal agencies develop community relations programs to be consistent with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). These requirements are the basis for more comprehensive and effective community relations activities.

It is U.S. Army Corps of Engineers policy to involve the public during the decision-making process for this site and to keep the public informed during remediation. This plan describes how the public has been involved in the investigation and decision-making process to date, and how they will continue to be involved. This plan includes:

- Public Involvement Goals and Objectives
- FUSRAP Historical Information
- Site Location, Description, and History
- Community Relations Background
- Community Relations Activities

The information in this plan is based on U. S. Environmental Protection Agency (EPA) guidance on community relations.

1.1 Goals and Objectives

It is the goal of U.S. Army Corps of Engineers goal to achieve a remedy, which is protective of human health and welfare and the environment. To effectively implement this goal, the U.S. Army Corps of Engineers Buffalo District pledges to be honest, forthright, responsive, and clear in dealing with the public, elected officials, interest groups, and the media.

It is the objective of the U.S. Army Corps of Engineers Buffalo District to:

- increase public awareness of the program and its activities;
- reduce misunderstanding about environmental problems and potential dangers;
- facilitate two-way communication with the affected public;
- establish an effective means for dispute resolution;
- and enhance the ability to perform this mission in the most effective and efficient manner.

1.2 Schedule of Activities Addressed by this Community Relations Plan

The tentative schedule for the remedial action for the Linde FUSRAP Site is as follows:

Schedule	Activity
Feb 1999	Issue Community Relations Plan.
Feb - Mar 1999	Issue Proposed Plan for comment.
Mar - Apr 1999	Hold Public Meeting
Apr - May 1999	Close the comment period
May - Jun 1999	Release Record of Decision and Responsiveness Summary
May - Jun 1999	Prepare a fact sheet to explain the remedial action
As required	Conduct information sessions with the Tonawanda community, property owners, Praxair, Inc. employees and tenants, and Holmes Elementary School to inform them about the remedial action and address their concerns.

1.3 Access to Information and Opportunities for Public Comment

The U.S. Army Corps of Engineers Buffalo District FUSRAP Community Relations Specialist is Ms. Arleen Kreusch. Ms. Kreusch can be reached at (800) 833-6390 or (716) 879-4438.

Information pertaining to the Linde Site can be found in the Linde Site Administrative Record File and Tonawanda Sites Administrative Record. These records are established in the Tonawanda Public Library located at 333 Main Street, Tonawanda, New York, and the U.S. Army Corps of Engineers FUSRAP Public Information Center located at 1776 Niagara Street, Buffalo, New York.

Individuals and organizations may be placed on the mailing list by calling (800)-833-6390. Public comments should be mailed to Ms. Arleen Kreusch at the U.S. ARMY CORPS OF ENGINEERS FUSRAP Public Information Center, 1776 Niagara Street, Buffalo, NY 14207.

Significant developments relating to the FUSRAP Linde Site will be announced by news releases to the media and placement of display ads in the local newspapers.

2.0 Program Historical Information

In 1974, the U. S. Atomic Energy Commission initiated the Formerly Utilized Sites Remedial Action Program (FUSRAP) to identify and clean up or otherwise control sites where residual radioactivity remains in excess of current guidelines. The Energy and Water Development Appropriations Act (1998) assigned management of FUSRAP to U.S. Army Corps of Engineers Buffalo District will conduct the Linde Site clean up in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

3.0 Linde FUSRAP Site Information

3.1 Site Location, Description, and History

Linde

The Linde Site is located on East Park Drive and Sheridan Drive in the Town of Tonawanda. The property is an industrial area of approximately 105 acres that contains parking lots, office buildings, and other buildings currently used as research laboratories, fabrication facilities, storage areas, and warehouses. The property is surrounded by residential areas, a golf course, industrial and commercial facilities. About 1,400 workers are employed at Praxair, Inc. (formerly Linde Air Products).

Table 1 identifies how each building was involved in Manhattan Engineer District activities and the current status of each area of the site.

Table 1
Historical and Current Activities
(sorted by date)

	1942-1946	Interim Actions	Final Actions
Soils & Slabs		Designated in 1981	1999 - Will be addressed In Proposed Plan
Building 14	Used as a pilot plant for uranium separation	Decontaminated in 1976	1998 - Decontaminated
Building 30	Primary facility used for uranium processing	Designated in 1981	1998 - Demolished
Soil excavated in area of Building 90		Excavated in 1980 Segregated & stored in Building 30 in 1996	1997 – Offsite Disposal
Building 38	Uranium oxide converted to uranium tetrafluoride	Designated in 1981	1996 - Demolished
Building 31	Used for uranium separation	Decontaminated in 1976	1996 - Decontaminated
Building 37	Used for uranium separation	Decontaminated in 1976 and in 1980	1981 - Demolished

Designated Vicinity Property – Town of Tonawanda Landfill

The Town of Tonawanda Landfill is a designated Linde Site vicinity property, which is approximately 55 acres in Tonawanda, New York. Municipal waste disposal began in the 1930s and continued through 1989. Records indicate that the landfill was principally used for the disposal of household waste, construction and demolition material, leaves, incinerator ash, and unburned municipal waste.

Since 1960, several studies have been conducted at the landfill to gather information about site conditions and the nature of the materials deposited there. As a result of several investigations, portions of the Town of Tonawanda landfill were designated into the FUSRAP program as a vicinity property to the Linde Site. Some of these investigations are identified below.

The Oak Ridge National Laboratory (ORNL) conducted the survey in September 1991 of the Town of Tonawanda Landfill and the adjacent mudflats to determine if Manhattan Engineer District related material from Linde Air Products had been deposited in the landfill. The survey included a surface gamma scan and the collection of soil samples for radiological analyses. A total of 172 samples were collected. The ORNL survey identified material with “technologically enhanced levels of uranium-238 (U-238) not unlike the product material at the Linde plant” and other material “similar to the residues of byproduct of the refinery operation conducted at the Linde plant” (ORNL 1992).

Investigations conducted in 1994 and 1995 primarily defined the maximum depth, concentration and volume of elevated radioactivity (Bechtel 1995). Bechtel collected samples at spots identified by gamma scans to have high potential for contamination. Surface water and sediments were sampled to verify that surface water was not transporting radioactivity to new areas. Groundwater samples were analyzed to verify that radioactivity above guidelines was not entering the groundwater system.

3.2 Surrounding Area

Linde

The property, which is currently owned by Praxair, is within a half mile of residential areas to the east, north, and west and within a quarter mile of Holmes Elementary School. The property is also located next to Sheridan Park, a large recreational area that includes athletic fields, a golf course, and a lake.

Adjacent Vicinity Properties

Adjacent properties include a residential area within the City of Tonawanda, a railroad spur line, a Niagara Mohawk Power Corporation utility corridor, and a municipal incinerator that is no longer in use. The Niagara Mohawk right-of-way has been investigated and recommended to be designated for remedial action.

3.3 Type of Hazardous Substances at the Site

Linde

The contaminants of concern at the Linde Site are Uranium-238, Uranium-234, Uranium-235, Radium-226, Thorium-230 and their respective radioactive decay products. There are other chemicals on site that are used by Praxair during their industrial operations.

Designated Vicinity Property – Town of Tonawanda Landfill

The contaminants of concern at the Town of Tonawanda Landfill are Radium-226, Thorium-230, and Uranium-238. There are unknown contaminants associated with prior landfill operations.

4.0 Community Background

4.1 Government Entities

The Linde FUSRAP Site is located in the Town of Tonawanda, in Erie County, New York. Town of Tonawanda voters elect a Supervisor and six Council members as legislators and town administrators. Residents normally direct their questions, complaints, and suggestions to the Town Clerk, who forwards them to the proper department or official.

The Erie County government includes a County Executive and county legislature. The County Executive is the chief administrative officer of the county and is elected to a four-year term. The legislature is currently composed of 17 members.

4.2 Chronology of Community Involvement

Involvement with the community is outlined on the next page in Table 2.

Table 2. Chronology of Community Involvement

Date	Activity
April 1988	Public scoping meeting held to explain the Remedial Investigation/Feasibility Study-Environmental Impact Statement (RI/FS-EIS) process
June 1988	Follow-up informational meeting
July 1988	Local Tonawanda and state officials formed the Coalition Against Nuclear Materials in Tonawanda (CANiT) to present community concerns to the Department of Energy.
August 1988	Moratorium on RI/FS-EIS work in Tonawanda while attempting to resolve community concerns regarding plans to consolidate the waste from Tonawanda with waste from a FUSRAP site in eastern New York (Colonie, New York).
October 1988	Congress passed legislation agreeing that the DOE should not move or study the move of any FUSRAP waste within the State of New York to the Town of Tonawanda, New York.
October 1988	Moratorium lifted, remedial investigation begins
1992	Information sessions held to update the public with the status of activities at the sites. And educate the community about the remedial options for the Tonawanda Sites and to address any questions or concerns of the community
March, 1993	DOE opened a Public Information Center to provide the public with additional access to information and to serve as a meeting place for workshops and availability sessions.
1993	Availability sessions and workshops conducted to provide the community with an overview of the decision-making process and DOE's preferred alternative prior to the public meeting.
December 1993	Public meeting held to solicit public comment on the proposed plan for the Tonawanda Sites. The majority of the commentors disapproved of DOE's proposed plan to build move wastes from the Tonawanda Sites to a containment structure located on one of the sites.
January 1994	CANiT holds their own public meeting to gather support for its position against the preferred alternative.
April 1994	DOE in a joint action with Representative John LaFalce suspended the decision-making process.
July 1994	Admiral Richard Guimond, U. S. DOE Principal Deputy Assistant Secretary for Environmental Management and Representative John LaFalce met with key Tonawanda stakeholders to discuss the overall remedial selection process. The meeting resulted in commitments by DOE to present a draft work plan for input on a process for working collaboratively with the community on a cleanup remedy as well as conduct a public workshop on treatment technologies.
September 1994	Treatment technologies workshop held
October 1994	Work plan meeting held. The consensus of the people attending the session was to continue allowing CANiT to represent the community in discussions with DOE on cleanup alternatives as opposed to establishing a representative community group.
October 1997	FUSRAP transferred to U.S. Army Corps of Engineers
July 1998	U.S. Army Corps of Engineers met with Linde Site (Praxair) tenants, employees, local business representatives, and Holmes Elementary School representatives to explain plans for demolition of Building 30

5.0 Community Relations Program

5.1 Community Relations Tools

Use of the community relations tools in the following table will ensure that the public is well informed about the decision-making process for the Linde FUSRAP Site and has the opportunity to participate, address issues of concern are addressed, and relevant information is exchanged:

Tool	Description
Toll-free access phone line	1-800-833-6390
U.S. Army Corps of Engineers FUSRAP internet website	www.fusrap.U.S. Army Corps of Engineers.army.mil
U.S. Army Corps of Engineers Buffalo District website	www.ncb.U.S. Army Corps of Engineers.army.mil
Information Contact and phone number	Ms. Arleen Kreusch (716) 879-4438
Administrative Record	The Administrative Record File enables the community to review documents that U.S. Army Corps of Engineers has used to evaluate the alternatives for the removal action for the Linde FUSRAP Site and to select the preferred alternative.
Locations for the Administrative Record File	U.S. Army Corps of Engineers FUSRAP Public Information Center, 1776 Niagara St., Buffalo, NY Tonawanda Public Library, 333 Main Street, Tonawanda, New York
Fact Sheets	Fact Sheets will be developed to easily convey information regarding the Linde FUSRAP Site.
Display Advertisements and News Releases	Display ads will be placed in The Buffalo News, The Tonawanda News, The Record Advertiser and the Ken-Ton Bee and news releases will be sent to local newspapers to announce upcoming releases or events in regard to the sites.
Information Sessions	Information sessions will be held for the community during the remedial action to exchange information and answer questions pertaining to the sites.

Appendix A. Contact List of Key Community Leaders and Interested Parties

Government Entities

Honorable John J. LaFalce
Representative in Congress
111 West Huron Street
Buffalo, NY 14202
(716) 846-4056

Robin Schimminger
New York State Assembly
3514 Delaware Avenue
Kenmore, NY 14217
(716) 877-8800

Dennis Gorski
Erie County Executive
95 Franklin Street
Buffalo, NY 14202
(716) 858-8500

Charles M. Swanick
Erie County Legislature Chairperson
95 Franklin Street
Buffalo, NY 14202
(716) 877-3986

Regulatory Agency

Paul Merges, Ph.D.
Director
Bureau of Radiation & Hazardous Site Management
Division of Solid & Hazardous Materials
New York State Department of Environmental Conservation
50 Wolf Road
Albany, NY 12233-7255

Community Involvement

Coalition Against Nuclear Materials in Tonawanda (CANiT)
Attn.: Richard Tobe
Erie County Department of Environment and Planning
95 Franklin Street
Buffalo, NY 14202
(716) 858-6716

For a Clean Tonawanda Site (F.A.C.T.S)
Attn.: Don Finch
P. O. Box 566
Kenmore, NY 14217-0566

League of Women Voters
Attn: Leonore Lambert
451 South Street
East Aurora, NY 14052-2946

Niagara Group Sierra Club
Attn.: Kathleen Sullivan
124 Curtis Parkway
Buffalo, NY 14223

Media Distribution

Newspaper

Buffalo News
1 News Plaza
P. O. Box 100
Buffalo, NY 14240
Phone: (716) 849-5531
Fax: (716) 856-5150

Ken-Ton Bee
P. O. Box 150
Buffalo, NY 14231-0150
Phone: (716) 632-4700
Fax: (716) 633-8601

Tonawanda News
P. O. Box 668
North Tonawanda, NY 14120
Phone: (716) 693-1000
Fax: (716) 693-8573

Television Stations

WGRZ-TV
259 Delaware Avenue
Buffalo, NY 14202
Phone: (716) 849-5756
Fax: (716) 849-5706

WIVB-TV
2077 Elmwood Avenue
Buffalo, NY 14207
Phone: (716) 876-7333
Fax: (716) 874-8173

WKBW-TV
7 Broadcast Plaza
Buffalo, NY 14202
Phone: (716) 845-6100
Fax: (716) 856-8784

Radio Stations

WHLA AM Radio
2692 Stanley Road
Grand Island, NY 14072
Phone: (716) 773-1270
Fax: (716) 773-1498

WGR News Radio
464 Franklin Street
Buffalo, NY 14202
Phone: (716) 881-4555
Fax: (716) 884-2931

WBEN AM 930
2077 Elmwood Avenue
Buffalo, NY 14207
Phone: (716) 876-0930
Fax: (716) 876-1344

WNED AM
Horizons Plaza
P. O. Box 1263
Buffalo, NY 14240
Phone: (716) 845-7000
Fax: (716) 845-7043

WWKB AM 1520
695 Delaware Avenue
Buffalo, NY 41209
Phone: (716) 884-5101
Fax: (716) 882-2048

Appendix B. Suggested Locations for Meetings and Locations for Administrative Record and Information Repositories

Meeting Locations

Phillip Sheridan Building
3200 Elmwood Avenue
Kenmore, New York

Administrative Record Locations

U.S. ARMY CORPS OF ENGINEERS FUSRAP Public Information Center
1776 Niagara Street
Buffalo, NY 14207-3199

Tonawanda Public Library
333 Main Street
Tonawanda, NY 41450