

Town of Islip

Periodic Review Report

Former CAMCO Site

NYSDEC Site Number 152206

October 2022

Periodic Review Report

Former CAMCO Site, NYSDEC Site Number 152206

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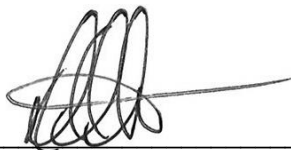
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Prepared For:

Town of Islip
Department of Aviation and Transportation
Long Island MacArthur Airport
100 Arrival Avenue, Suite 100
Ronkonkoma, New York 10039

Our Ref: 30142977.SPDES2022



David E. Stern, PG, LEP
Project Manager/ Principal Hydrogeologist



Salvatore Tedesco
Field Inspector



Christopher D, Engler. PE
Vice President/ Principal Engineer

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Executive Summary

Summary

The former Central Aviation & Marine Corporation (CAMCO) facility (Site) is located in Ronkonkoma, Suffolk County, New York. The Site is located on the west side of the Long Island MacArthur Airport complex. The Site consists of two parcels, measuring approximately 2.03 acres (Parcel A) and 0.62 acres (Parcel B), respectively (Figure 1). The owner of the Site is the Town of Islip. The Site is currently vacant and utilized for storage/warehousing.

The extent of contamination associated with Parcel A included tetrachloroethene and associated dechlorinated compounds and petroleum related compounds in shallow soil vapor, the presence of Aroclor in soil, and petroleum related volatile organic compounds (VOCs) in groundwater.

Remedial action on-site work for Parcel A was initiated on November 18, 2014, and final site restoration was completed on March 20, 2015. The work included the excavation and off-site disposal of approximately 200 tons of non-hazardous VOC impacted soil and backfilling with clean imported fill. Based upon post-excavation sampling results, the interim remedial measure (IRM) goal of no remaining VOC concentrations exceeding the Unrestricted Use SCOs was achieved.

The extent of contamination associated with Parcel B included tetrachloroethene in shallow soil vapor, and petroleum related VOCs and pesticides in the groundwater. There were no exceedances of New York State Department of Environmental Conservation (NYSDEC) Unrestricted Use soil cleanup objectives (SCOs) in soil in accordance with 6NYCRR part 375-Table 375-6.8(a).

Effectiveness of the Remedial Program

Site remediation activities associated with Parcel A were completed in March 2015 and this parcel remains vacant and undisturbed subsequent to the remedial work.

Parcel B did not require remedial work and remains undisturbed and utilized as a storage warehouse.

Compliance

The major elements of the Site Management Plan (SMP) were complied with. There were no areas of non-compliance.

Recommendations

There are no recommendations with respect to changes to the SMP, the frequency of submissions of periodic review reports (PRRs) or requirements for discontinuing the SMP. It was reported by the Sheltair representative at the time of September 23, 2022, Parcel B site inspection that existing warehouse building is planned for demolition in 2023. SMP recommendations for the disturbance and handling of soils at the site and CAMP procedures must be adhered to at the time of building demolition.

1 Site Overview

The Site is located in Ronkonkoma, Suffolk County, New York on the west side of the Long Island MacArthur Airport complex and on the east side of Smithtown Avenue, approximately one (1) mile north of Veterans Memorial hwy. and one (1) mile south of the Long Island Expressway (I-495).

The surrounding area consists of: (1) a paved access roadway, Suffolk County Police to the north; (2) Long Island MacArthur Airport runways and vacant land to the east; (3) Paved roadway and small aircraft hangers to the south; and (4) Smithtown Avenue and commercial properties to the west.

The nature and extent of contamination prior to site remediation occurred on two parcels identified as Parcel A and Parcel B.

The extent of contamination on Parcel A consisted of soil and groundwater contamination. The nature of contamination regarding Parcel A consisted of tetrachloroethene and associated dechlorinated compounds and petroleum related compounds in shallow soil vapor, the presence of Aroclor in soil and petroleum related VOCs and SVOCs and inorganics in groundwater.

The nature of contamination associated with Parcel B consisted of tetrachloroethene in shallow soil vapor. Based on analytical results, there were no SCO exceedances in the soil. There were however petroleum related VOCs and pesticide impacts to groundwater.

Remedial action on-site work for Parcel A was initiated on November 18, 2014, and final site restoration was completed on March 20, 2015. The work included the excavation and off-site disposal of approximately 200 tons of non-hazardous VOC impacted soil and backfilling with clean imported fill. Based upon post-excavation sampling results, the goal of the IRM was achieved with no remaining VOCs found at concentrations exceeding the 6NYCRR part 375-Table 375-6.8(a): Unrestricted Use Soil Cleanup Objectives (SCOs).

No remedial activities were performed at Parcel B.

2 Evaluation of Remedy, Performance, Effectiveness, and Protectiveness

As noted in the SMP, Site-wide inspections are performed at a minimum of once per year. A recent Site inspection was performed on September 23, 2022. This inspection identified compliance with all institutional controls (ICs), including Site usage. Parcel A continued to be vacant vegetated land with no disturbance.

Parcel B continued to be utilized as a storage warehouse with no alterations to the structure, concrete floor, etc. The warehouse was found to be secured and an interior inspection was performed by Arcadis personnel during the September 23, 2022 site visit.

3 IC/EC Plan Compliance Report

Institutional controls (ICs) and their objectives include the following: (1) maintain and monitor existing site controls; (2) prevent future exposure to remaining contamination; and (3) limit the use and development of the Site to restricted residential, commercial, or industrial uses only.

The status of the ICs are as follows: (1) the Site is periodically inspected for any deviation from the existing site controls, (i.e., excavation, construction, etc.); (2) Future exposure is prevented by maintaining existing conditions with no excavation, construction activities, etc. and (3) there has been no development at the site in accordance with the SMP dated December 2015.

Corrective measures are presently not required as the site remains vacant with a warehouse utilized for storage purposes only. In conclusion, all of the ICs have been complied with. There are currently no Engineering Controls (EC's) applicable to this Site.

It was reported by the current Parcel B storage warehouse Site occupant that the warehouse building is planned for demolition sometime in 2023. Should either parcel be developed or altered, possible ICs will be considered following Site Plan review

4 Monitoring Plan Compliance Report

Ongoing media monitoring and sampling is not currently required for the Site.

The latest inspection of the Site was performed on September 23, 2022. Based on observations during the site visit, Parcel A continues to be vacant vegetative land and Parcel B is occupied by a warehouse for storage purposes. No changes have occurred at these locations since the completion of the 2020 PRR dated April 2020

An inspection form for the September 23, 2022 inspection is included in **Appendix A**.

5 Operation & Maintenance (O&M) Plan Compliance Report

The site remedy does not rely on any mechanical systems, such as groundwater treatment systems, sub-slab depressurization systems, or air sparge/soil vapor extraction systems, to protect public health and the environment. Therefore, the operation and maintenance of such components is not included in this document.

6 Overall PRR Conclusions and Recommendations

The following conclusions are made based on the site inspection:

- Compliance with the SMP was limited to the IC/EC component.
- All institutional controls and their requirements were met.
- There was no EC component required.

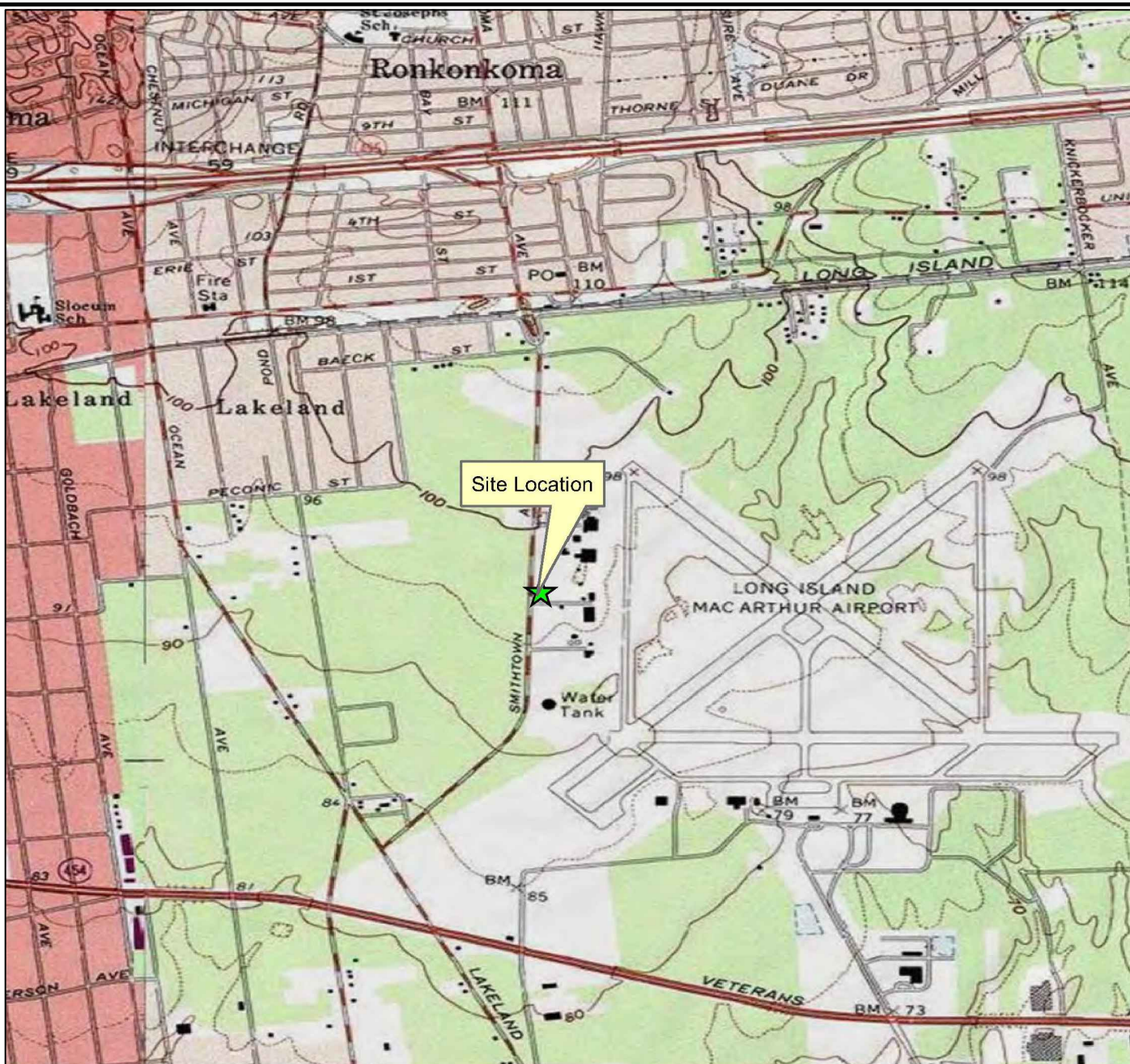
Recommendations include the continued periodic inspections of the Site and adherence to all SMP recommendations. Prior to initiating demolition activities associated with the warehouse structure on Parcel B, a Work Plan should be developed and submitted to the NYSDEC to ensure potential environmental issues (including modifications to ICs and ECs) are adequately addressed. A completed PRR Certification Form is included in Appendix B.

7 References

EnviroTrac (December 2015) , *Former CAMCO Site, 2125 Smithtown Avenue Suffolk County Ronkonkoma New York, Site Management Plan*

Eryou Engineering (April 2020) , *Former CAMCO Site, 2125 Smithtown Avenue Suffolk County Ronkonkoma New York, Periodic Review Report*

Figures



QUAD: CENTRAL ISLIP
 APPROXIMATE ELEVATION: 87 FEET



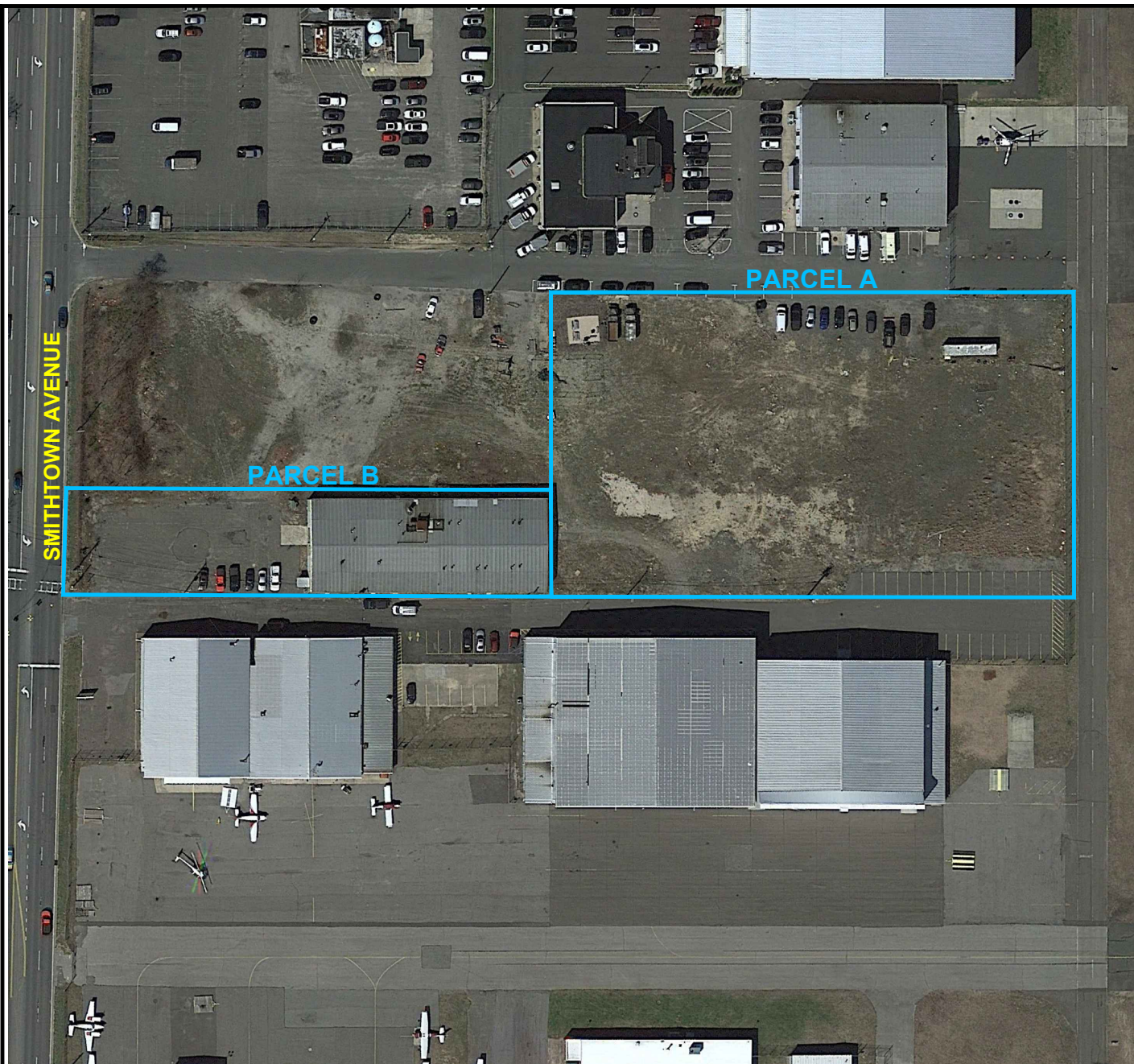
CAMCO
 2125 SMITHTOWN AVENUE
 RONKONKOMA, NEW YORK

SITE LOCATION MAP



FIGURE

1



SOURCE: GOOGLE EARTH PRO - APRIL 4, 2021



GRAPHIC SCALE

CAMCO
2125 SMITHTOWN AVENUE
RONKONKOMA, NEW YORK

SITE LAYOUT



FIGURE

2

PhotoLog

Project Photographs

Former CAMCO Site, Ronkonkoma, New York



Photo: 1

Date: September 23, 2022

Location: Parcel A

Description: Vacant Land
looking west.



Photo: 2

Date: September 23, 2022

Location: Parcel A

Description: Vacant land
looking northwest.

Project Photographs

Former CAMCO Site, Ronkonkoma, New York



Photo: 3

Date: September 23, 2022

Location: Parcel B

Description: Portion of warehouse building occupied by Suffolk County Police Department.



Photo: 4

Date: September 23, 2022

Location: Parcel B

Description: Portion of warehouse building occupied by Sheltair.

Appendix A

Site Inspection Form

SITE-WIDE INSPECTION FORM

Former CAMCO Site Index # A1-0627-12-09
Suffolk County
2125 Smithtown Avenue, Ronkonkoma, New York

Name of Inspector: Salvatore Tedesco	Date of Inspection: 09/23/22
Company of Inspection: Arcadis	Current Use of Site: Vacant Land & Warehouse Storage
Has a Change of Use Occurred since the Last Inspection? Yes _____ No <u>✓</u>	
If yes, then Explain	

General Operation of Site Controls: Parcel A – Vacant vegetative site with no disturbance.
Parcel B – Utilized for the storage of heavy equipment, trucks, miscellaneous construction tools and materials.

Have the Site Controls Been Penetrated? Yes _____ No <u>✓</u>
If yes, then Explain

Have any structures been constructed on the Site since the Last Inspection?
Yes _____ No <u>✓</u>
If yes, then Explain

Have Site Conditions changed since the Last Inspection that Require Maintenance/Repair?
Yes _____ No <u>✓</u>
If yes, then Explain

Additional Observations, Conclusions or Recommendations
Warehouse tenant indicated the building is proposed for demolition circa 2023. All CAMP and SMP protocols must be adhered to at the time of building demolition and IC re-evaluated. ECs will be considered with any new building construction or Site redevelopment.

Note: Any changes of the Site Should be Marked in the Corresponding Location on the Attached Map.

Appendix B

Miscellaneous / Certifications

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation

625 Broadway, 11th Floor, Albany, NY 12233-7020

P: (518)402-9543 | F: (518)402-9547

www.dec.ny.gov

9/13/2022

Robert Schneider
Deputy Commissioner Of Aviation & Transport
Town of Islip, Long Island MacArthur Airport
Long Island MacArthur Airport
100 Arrival Avenue, Suite 100
Ronkonkoma, NY 11779
rschneider@islipny.gov

Re: Reminder Notice: Site Management Periodic Review Report and IC/EC Certification Submittal

Site Name: Central Aviation and Marine Corporation

Site No.: 152206

Site Address: 2125 Smithtown Avenue
Ronkonkoma, NY 11716

Dear Robert Schneider:

This letter serves as a reminder that sites in active Site Management (SM) require the submittal of a periodic progress report. This report, referred to as the Periodic Review Report (PRR), must document the implementation of, and compliance with, site-specific SM requirements. Section 6.3(b) of DER-10 *Technical Guidance for Site Investigation and Remediation* (available online at <http://www.dec.ny.gov/regulations/67386.html>) provides guidance regarding the information that must be included in the PRR. Further, if the site is comprised of multiple parcels, then you as the Certifying Party must arrange to submit one PRR for all parcels that comprise the site. The PRR must be received by the Department no later than **November 29, 2022**. Guidance on the content of a PRR is enclosed.

Site Management is defined in regulation (6 NYCRR 375-1.2(at)) and in Chapter 6 of DER-10. Depending on when the remedial program for your site was completed, SM may be governed by multiple documents (e.g., Operation, Maintenance, and Monitoring Plan; Soil Management Plan) or one comprehensive Site Management Plan.

A Site Management Plan (SMP) may contain one or all of the following elements, as applicable to the site: a plan to maintain institutional controls and/or engineering controls ("IC/EC Plan"); a plan for monitoring the performance and effectiveness of the selected remedy ("Monitoring Plan"); and/or a plan for the operation and maintenance of the selected remedy ("O&M Plan"). Additionally, the technical requirements for SM are stated in the decision document (e.g., Record of Decision) and, in some cases, the legal agreement directing the remediation of the site (e.g., order on consent, voluntary agreement, etc.).

When you submit the PRR (by the due date above), include the enclosed forms documenting that all SM requirements are being met. The Institutional Controls (ICs) portion of the form (Box 6) must be signed by you or your designated representative. If you cannot certify that all SM requirements are being met, you must submit a Corrective Measures Work Plan that identifies the actions to be taken to restore compliance. The work plan must include a schedule to be approved by the Department. The Periodic Review process will not be considered complete until all necessary corrective measures are completed and all required controls are certified. Instructions for completing the certifications are enclosed.



All site-related documents and data, including the PRR, must be submitted in electronic format to the Department of Environmental Conservation. The required format for documents is an Adobe PDF file with optical character recognition and no password protection. Data must be submitted as an electronic data deliverable (EDD) according to the instructions on the following webpage:

<https://www.dec.ny.gov/chemical/62440.html>

Documents may be submitted to the project manager either through electronic mail or by using the Department's file transfer service at the following webpage:

<https://fts.dec.state.ny.us/fts/>

The Department will not approve the PRR unless all documents and data generated in support of the PRR have been submitted using the required formats and protocols.

You may contact John Sheehan, the Project Manager, at 631-444-0244 or john.sheehan@dec.ny.gov with any questions or concerns about the site. Please notify the project manager before conducting inspections or field work. You may also write to the project manager at the following address:

New York State Department of Environmental Conservation
SUNY at Stony Brook
50 Circle Road
Stony Brook, NY 11790-3409

Enclosures

PRR General Guidance
Certification Form Instructions
Certification Forms

ec: w/ enclosures

ec: w/ enclosures

John Sheehan, Project Manager

Chris Engelhardt, Hazardous Waste Remediation Supervisor, Region 1

Kost Environmental Services Inc - Darrel J. Kost - dkostpe@aol.com

The following parcel owner did not receive an ec:

Town Of Islip - Parcel Owner

Enclosure 1

Certification Instructions

I. Verification of Site Details (Box 1 and Box 2):

Answer the three questions in the Verification of Site Details Section. The Owner and/or Qualified Environmental Professional (QEP) may include handwritten changes and/or other supporting documentation, as necessary.

II. Certification of Institutional Controls/ Engineering Controls (IC/ECs)(Boxes 3, 4, and 5)

1.1.1. Review the listed IC/ECs, confirming that all existing controls are listed, and that all existing controls are still applicable. If there is a control that is no longer applicable the Owner / Remedial Party should petition the Department separately to request approval to remove the control.

2. In Box 5, complete certifications for all Plan components, as applicable, by checking the corresponding checkbox.

3. If you cannot certify "YES" for each Control listed in Box 3 & Box 4, sign and date the form in Box 5. Attach supporting documentation that explains why the **Certification** cannot be rendered, as well as a plan of proposed corrective measures, and an associated schedule for completing the corrective measures. Note that this **Certification** form must be submitted even if an IC or EC cannot be certified; however, the certification process will not be considered complete until corrective action is completed.

If the Department concurs with the explanation, the proposed corrective measures, and the proposed schedule, a letter authorizing the implementation of those corrective measures will be issued by the Department's Project Manager. Once the corrective measures are complete, a new Periodic Review Report (with IC/EC Certification) must be submitted within 45 days to the Department. If the Department has any questions or concerns regarding the PRR and/or completion of the IC/EC Certification, the Project Manager will contact you.

III. IC/EC Certification by Signature (Box 6 and Box 7):

If you certified "YES" for each Control, please complete and sign the IC/EC Certifications page as follows:

- For the Institutional Controls on the use of the property, the certification statement in Box 6 shall be completed and may be made by the property owner or designated representative.
- For the Engineering Controls, the certification statement in Box 7 must be completed by a Professional Engineer or Qualified Environmental Professional, as noted on the form.



Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



Site Details

Box 1

Site No. **152206**

Site Name **Central Aviation and Marine Corporation**

Site Address: 2125 Smithtown Avenue Zip Code: 11716
City/Town: Ronkonkoma
County: Suffolk
Site Acreage: 3.941

Reporting Period: October 30, 2021 to October 30, 2022

YES NO

1. Is the information above correct? ☒ ☐

If NO, include handwritten above or on a separate sheet.

2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period? ☒ ☐

3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))? ☒ ☐

4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period? ☒ ☐

If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.

5. Is the site currently undergoing development? ☐ ☒

Box 2

YES NO

6. Is the current site use consistent with the use(s) listed below? ☒ ☐
Industrial

7. Are all ICs in place and functioning as designed? ☒ ☐

**IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

Description of Institutional ControlsParcelOwnerInstitutional Control

50-106-1-6.7

Town of Islip

Monitoring Plan
 IC/EC Plan
 Ground Water Use Restriction
 Landuse Restriction
 Building Use Restriction
 Site Management Plan

-The property may only be used for restricted residential, commercial or industrial purposes provided that the long-term Institutional Controls included in this SMP are employed.

-The property may not be used for a higher level of use, such as unrestricted use, without the necessary additional investigation and possible remediation.

?

-All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with this SMP.

?

-Restriction of the use of site groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County DOH.

-Requires compliance with the Department approved Site Management Plan.

?

-Gardening and/or farming activities at the property are prohibited.

?

-Any future new buildings constructed on site will be fitted with vapor mitigation barriers and evaluated for soil vapor intrusion.

?

-Conceptual site redevelopment plans include removal of the existing one-story steel frame slab-on-grade building on Parcel B. If demolished, or altered so as to disturb or remove in its entirety or a portion of the concrete slab, subsurface soils in the footprint and immediate surrounding area will be inspected to determine the existence of any soil contamination. If found, the contaminated soils must be delineated and addressed by necessary means.

?

-The site owner or remedial party will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC

Description of Engineering Controls

None Required

Not Applicable/No EC's

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the Engineering Control certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

☒ ☐

2. For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:

(a) The Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

☒ ☐

**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

**IC CERTIFICATIONS
SITE NO. 152206**

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1,2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Christopher D. Engler at Arcadis Two Huntington Quadrangle, Melville, NY 11747,
print name print business address

am certifying as Designated Representative (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.



Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

10/26/2022

Date

Enclosure 3
Periodic Review Report (PRR) General Guidance

- I. Executive Summary: (1/2-page or less)
 - A. Provide a brief summary of site, nature and extent of contamination, and remedial history.
 - B. Effectiveness of the Remedial Program - Provide overall conclusions regarding;
 - 1. progress made during the reporting period toward meeting the remedial objectives for the site
 - 2. the ultimate ability of the remedial program to achieve the remedial objectives for the site.
 - C. Compliance
 - 1. Identify any areas of non-compliance regarding the major elements of the Site Management Plan (SMP, i.e., the Institutional/Engineering Control (IC/EC) Plan, the Monitoring Plan, and the Operation & Maintenance (O&M) Plan).
 - 2. Propose steps to be taken and a schedule to correct any areas of non-compliance.
 - D. Recommendations
 - 1. recommend whether any changes to the SMP are needed
 - 2. recommend any changes to the frequency for submittal of PRRs (increase, decrease)
 - 3. recommend whether the requirements for discontinuing site management have been met.
- II. Site Overview (one page or less)
 - A. Describe the site location, boundaries (figure), significant features, surrounding area, and the nature and extent of contamination prior to site remediation.
 - B. Describe the chronology of the main features of the remedial program for the site, the components of the selected remedy, cleanup goals, site closure criteria, and any significant changes to the selected remedy that have been made since remedy selection.
- III. Evaluate Remedy Performance, Effectiveness, and Protectiveness
Using tables, graphs, charts and bulleted text to the extent practicable, describe the effectiveness of the remedy in achieving the remedial goals for the site. Base findings, recommendations, and conclusions on objective data. Evaluations and should be presented simply and concisely.
- IV. IC/EC Plan Compliance Report (if applicable)
 - A. IC/EC Requirements and Compliance
 - 1. Describe each control, its objective, and how performance of the control is evaluated.
 - 2. Summarize the status of each goal (whether it is fully in place and its effectiveness).
 - 3. Corrective Measures: describe steps proposed to address any deficiencies in ICECs.
 - 4. Conclusions and recommendations for changes.
 - B. IC/EC Certification
 - 1. The certification must be complete (even if there are IC/EC deficiencies), and certified by the appropriate party as set forth in a Department-approved certification form(s).
- V. Monitoring Plan Compliance Report (if applicable)
 - A. Components of the Monitoring Plan (tabular presentations preferred) - Describe the requirements of the monitoring plan by media (i.e., soil, groundwater, sediment, etc.) and by any remedial technologies being used at the site.
 - B. Summary of Monitoring Completed During Reporting Period - Describe the monitoring tasks actually completed during this PRR reporting period. Tables and/or figures should be used to show all data.
 - C. Comparisons with Remedial Objectives - Compare the results of all monitoring with the remedial objectives for the site. Include trend analyses where possible.
 - D. Monitoring Deficiencies - Describe any ways in which monitoring did not fully comply with the monitoring plan.
 - E. Conclusions and Recommendations for Changes - Provide overall conclusions regarding the monitoring completed and the resulting evaluations regarding remedial effectiveness.
- VI. Operation & Maintenance (O&M) Plan Compliance Report (if applicable)
 - A. Components of O&M Plan - Describe the requirements of the O&M plan including required activities, frequencies, recordkeeping, etc.
 - B. Summary of O&M Completed During Reporting Period - Describe the O&M tasks actually completed during this PRR reporting period.
 - C. Evaluation of Remedial Systems - Based upon the results of the O&M activities completed, evaluated

the ability of each component of the remedy subject to O&M requirements to perform as designed/expected.

- D. O&M Deficiencies - Identify any deficiencies in complying with the O&M plan during this PRR reporting period.
- E. Conclusions and Recommendations for Improvements - Provide an overall conclusion regarding O&M for the site and identify any suggested improvements requiring changes in the O&M Plan.

VII. Overall PRR Conclusions and Recommendations

- A. Compliance with SMP - For each component of the SMP (i.e., IC/EC, monitoring, O&M), summarize;
 - 1. whether all requirements of each plan were met during the reporting period
 - 2. any requirements not met
 - 3. proposed plans and a schedule for coming into full compliance.
- B. Performance and Effectiveness of the Remedy - Based upon your evaluation of the components of the SMP, form conclusions about the performance of each component and the ability of the remedy to achieve the remedial objectives for the site.
- C. Future PRR Submittals
 - 1. Recommend, with supporting justification, whether the frequency of the submittal of PRRs should be changed (either increased or decreased).
 - 2. If the requirements for site closure have been achieved, contact the Departments Project Manager for the site to determine what, if any, additional documentation is needed to support a decision to discontinue site management.

VIII. Additional Guidance

Additional guidance regarding the preparation and submittal of an acceptable PRR can be obtained from the Departments Project Manager for the site.

Arcadis of New York, Inc.
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Melville
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