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Periodic Review Report August 2023
NYSDEC Site No. 344014

West Nyack Operating Center

766 West Nyack Road, West Nyack, NY
(Formerly 180 West Nyack Road)

Submitted to:
Orange and Rockland Utilities, Inc.
c/o Consolidated Edison Company of New York, Inc.
31-01 20th Avenue, Building 138, 2nd Floor
Long Island City, NY 11105-2048

Submitted by:
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August 2023
Project 2101712

Wendy Moore, P.E.
Project Manager

Matthew O'Neil, P.E.
Senior Engineer

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Executive Summary

GEI Consultants, Inc. (GEI) has prepared this Periodic Review Report (PRR) on behalf of Orange and Rockland Utilities, Inc (O&R) for the West Nyack Operating Center (WNOC). This document is required as an element of the remedial program under the New York State Inactive Hazardous Waste Disposal Site Remedial Program, administered by New York State Department of Environmental Conservation (NYSDEC).

The O&R WNOC facility is currently used as a satellite service center for O&R line crews. The facility includes a fueling station for utility service trucks, parking space for O&R vehicles, equipment storage, and office space for personnel. The Site was remediated in 1998 in accordance with the NYSDEC-approved Remedial Action Work Plan (RAWP). The remedial actions included:

- Excavation of soil containing petroleum-related volatile organic compounds (VOCs) and polychlorinated biphenyls (PCBs) greater than NYSDEC recommended cleanup levels.
- Placement of a composite cover system over remaining soil impacts at the Site.
- Development and implementation of a Site Management Plan (SMP).

As part of the remedy, institutional and engineering controls, including a deed restriction and periodic inspection and monitoring requirements, were put in place to prevent uncontrolled exposure to remaining subsurface impacts on Site.

Annual Site-wide inspections and annual cover system monitoring are performed in accordance with the SMP to document the condition of the institutional and engineering controls. The annual inspections and monitoring have concluded that the institutional and engineering controls remain effective, with some minor repairs being made on an as-needed basis. Specifically, the condition of the asphalt cover in the parking and driveway areas throughout the Site is functioning as designed; no full-depth cracks were identified within the asphalt (i.e., minimal cracking exists, but do not extend to the sub-base). The areas of the surface cover consisting of oil stone chips remains functional, although replenishment of the oil stone layer is recommended in some areas (i.e., on slope behind building and under the northeastern transmission tower). The perimeter fencing is functioning as designed.

Annual Site-wide inspections and annual cover system monitoring will continue to be performed in accordance with the SMP unless or until NYSDEC authorizes modification to the SMP. The next Site-wide inspection and cover system monitoring will be performed during the 2024 construction season. The SMP states that a PRR will be submitted to the

NYSDEC every fifth year. The next PRR submittal will be in August 2028. The results of the 2024 through 2028 annual Site-wide inspections and annual cover system monitoring will be provided to the NYSDEC in the August 2028 PRR.

1. Introduction

1.1 General

This Periodic Review Report (PRR) for the West Nyack Operating Center (WNOC) has been prepared on behalf of Orange and Rockland Utilities, Inc (O&R). This document is required as an element of the post-remedial program under the New York State Inactive Hazardous Waste Disposal Site Remedial Program, administered by New York State Department of Environmental Conservation (NYSDEC). The Site was remediated in accordance with Order on Consent Index # W3-0508-93-12, Site # 344014, which was executed on August 2, 1994.

This report documents the Site-wide inspection and surface cover system monitoring performed during the subject reporting period (i.e., 2019 through 2023) and the current Site conditions relative to the institutional and engineering controls established for the Site. This report has been prepared in accordance with the requirements of Chapter 6 of Division of Environmental Remediation (DER)-10, Technical Guidance for Site Investigation and Remediation, dated May 2010 and the guidance provided in a NYSDEC letter to O&R dated June 20, 2023.

1.2 Site Overview

The Site is located at 766 West Nyack Rd., (formerly 180 West Nyack Rd.) in the Town of Clarkstown, County of Rockland, New York and is identified as Block 2 and Lots 47 and 48 on the Clarkstown Tax Map. **Figure 1** shows the Site location. The Site is an approximately 3-acre area bounded by Hackensack River to the north and east, Old Nyack Turnpike (also called West Nyack Road) to the south, and Consolidated Rail Corporation (Conrail) rail tracks to the west **(Figure 2)**. O&R also owns Lot 43 south of West Nyack Road; however, this property is used for employee parking for the O&R facility, was not part of the remedial actions for the Site and is not included in the engineering controls described in the Site Management Plan (SMP). South of the WNOC Site, directly across Route 59, is the Grant Hardware Site (NYSDEC # 344031).

The WNOC facility is currently used as a satellite service center for O&R line crews. The facility includes a fueling station for utility service trucks, parking space for O&R vehicles, equipment storage, and office space for personnel. From the 1920s to approximately 1981, transformers, capacitors, and other electrical equipment were stored and repaired at the facility. Two underground storage tanks (USTs) were previously located near the center of the Site and used to store gasoline for fueling O&R's utility vehicles.

One tank was identified as leaking and was removed in 1989. The second tank was removed during the 1997 to 1998 remedial actions.

A Remedial Investigation (Rust Environment & Infrastructure, [RUST], 1996), a Feasibility Study (RUST, 1997a), and additional Supplemental Subsurface Investigation (Tetra Tech, 2005) were performed to characterize the nature and extent of Site impacts. The results of these investigations indicated the subsurface soil in the vicinity of the UST area exhibited elevated petroleum-related volatile organic compound (VOC) concentrations. The depth of petroleum impacted soil ranged from 1 foot to 14 feet. Limited polychlorinated biphenyl (PCB) impacts in subsurface soil were also identified.

Quarterly groundwater sampling performed from 2006 through 2011 indicated that concentrations of chlorinated VOCs and their breakdown products remained generally consistent. Wells showing the highest concentrations of chlorinated VOCs were located along the southern, upgradient, boundary of the Site. The upgradient former Grant Hardware Site was identified as the source of these impacts and they are not attributed to O&R.

The WNOC Site was remediated in accordance with the NYSDEC-approved Remedial Action Work Plan (RAWP) (RUST, 1997b). A Record of Decision (ROD) was issued in October 1997. The remedial action included:

- Excavation of 9,328 cubic yards of soil from areas on the Site containing petroleum related VOCs and PCBs in excess of NYSDEC recommended cleanup levels (0.06 mg/kg benzene and 1.2 mg/kg xylene and 10 mg/kg PCBs).
- Placement of a composite cover system over remaining soil impacts at the Site.
- Development and implementation of a SMP for long term management of remaining contamination.

Remedial activities were initiated by O&R in November 1997 and completed in April 1998 as documented in the Remedial Action Work Plan and Final Engineering Report for Orange & Rockland, Inc (RUST, 1997b and 1998). The SMP was finalized in July 2012 (AECOM, 2012). The SMP identified the long-term Site monitoring and inspection tasks that are required to continue following completion of the remedial action, including annual Site inspections and surface cover monitoring, as further described in Section 4.3.

2. Evaluation of Remedy

Components of the remedy identified in the ROD have been implemented. Based on the information collected as part of the long-term inspections, the remedy continues to operate as designed and has been effective in preventing uncontrolled exposure to remaining subsurface impacts on Site. Specifically:

- As documented in the Final Engineering Report (Certification Report; RUST, 1998) the remedy was successful in removing soil from areas containing petroleum-related VOCs and PCBs in excess of NYSDEC recommended cleanup levels (0.06 mg/kg benzene and 1.2 mg/kg xylene and 10 mg/kg PCBs).
- A deed restriction to limit the use and development of the Site to commercial or industrial uses only is in place.
- The surface cover system has been maintained to prevent exposure to remaining subsurface contamination.
- The NYSDEC has been notified of potential subsurface disturbances in accordance with the SMP.

3. Institutional and Engineering Control Compliance

3.1 General

Because impacts remain in the subsurface as described above, institutional and engineering controls have been implemented to protect human health and the environment, as further discussed below.

3.2 Institutional Controls

A series of institutional controls is required by the ROD to: (1) implement, maintain, and monitor engineering control systems; (2) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination; and (3) limit the use and development of the Site to commercial or industrial uses. The deed restriction requires adherence to these institutional controls and the SMP provides implementation details. A summary of the institutional controls that are detailed in the SMP are provided below. (The complete detailed listing of the institutional controls is provided in Section 2.3 of the SMP.)

- Compliance with the deed restriction and the SMP;
- The engineering control (soil cap/composite cover system) must be operated and maintained as specified in the SMP;
- The integrity of surface cover system must be visually inspected annually;
- Data and information pertinent to management of the Site must be reported at the frequency and in a manner defined in the SMP (PRRs will be submitted to the NYSDEC every fifth year, beginning eighteen months after the Certificate of Completion or Satisfactory Completion Letter is issued);
- The property may only be used for industrial or commercial use provided that the long-term engineering and institutional controls included in this SMP are employed;
- Future activities on the property that will disturb remaining contaminated material must be conducted in accordance with the Excavation Work Plan provided in the SMP;
- The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use;

- The potential for vapor intrusion must be evaluated for any buildings developed in the area while groundwater impacts are still present and any potential impacts that are identified must be monitored or mitigated; and
- Vegetable gardens and farming on the property are prohibited.

Site-wide inspections have been conducted by O&R and GEI annually during the reporting period (2019 through 2023). The associated annual inspection reports are provided in **Appendix A**, each of which includes photographs and a copy of the Annual Inspection and Certification Checklist. The most recent Site-wide inspection was conducted on July 31, 2023.

Site usage and ownership has not changed as of the date of the 2023 inspection. The Site continues to be industrial/commercial use as a satellite service center for O&R line crews with a fueling station for utility service vehicles, parking space for O&R vehicles, equipment storage, and office space for personnel. The surface cover has been maintained and remains operational with some additional maintenance recommended (Section 3.3). Except as described below, there has been no evidence of groundwater use, development (i.e., no new or removed structures) or use of on-Site soil for vegetable gardens or farming throughout the current reporting period. There was no evidence of unauthorized entry, damage to entrances or exits, illegal dumping, or unusual odors. There were some housekeeping issues identified but none of the housekeeping issues impacted the effectiveness of the institutional controls.

During the July 2023 inspection, it was noted that raised bed gardens has been added under the northwestern transmission tower; however, these gardens are wholly contained within planters (i.e., galvanized steel water trough/stock tanks) and are not in contact with on-Site soil, nor were any intrusive activities conducted during their installation.

In July 2021, four electric car charging stations were installed in the unpaved area adjacent to the asphalt along the southeastern fence line. The asphalt was not disturbed during installation of the charging stations, bollards, utility pole, or associated electrical components.

No additional intrusive activities were performed between July 2019 and August 2023.

In summary, based on conditions observed during the annual Site inspections, the institutional controls identified in the SMP are consistent with the deed restriction requirements, remain in place and are effective, as further described in the reports included in **Appendix A**. The remedy continues to be protective of public health and the environment as described in the Final Engineering Report (RUST, 1998).

3.3 Engineering Controls

Engineering controls consist of a surface cover system (**Figure 2**). Specifically, exposure to remaining impacts in soil/fill is prevented by a surface cover system placed over the Site. Following remedial actions, the excavated area (**Figure 3**) was backfilled with a combination of clean fill and reused thermally treated soils. An impermeable asphalt cover was then placed over the remainder of the WNOC property. This cover consists of 3 inches of binder course and 1 ½ inches of wearing course placed over all paved parking areas., In addition to the asphalt layer in areas that were excavated as part of the remedial action, 12 inches of structural subbase were placed beneath the asphalt layer. In the driveway areas which were already paved, Petro- Mats® were laid over the existing pavement and covered with approximately 1 ½ inches of wearing course. Additionally, several inches of oiled stone chips were placed beneath the transmission towers in the northernmost portion of the Site, as well as in the areas immediately adjacent to the rear of the building in order to protect the integrity of the asphalt cover. Security fencing was also replaced around the WNOC facility.

The SMP specifies that a visual inspection of the complete surface cover system will be conducted on an annual basis concurrently with the Site-wide inspection. Components of the surface cover system are inspected for the following:

- Integrity of asphalt covered roads (specifically, paved roads and parking areas, as well as the oil stone chips);
- Integrity of sidewalks;
- Integrity of concrete building slabs; and
- Integrity of “clean surface cover/cap” (i.e., 12 inches clean soil below asphalt and oil stone chips in excavation areas [Figure 3])

If any of the components of the composite cover system are not functioning as designed, maintenance and repair are required to restore the integrity of the surface cover system as soon as practical.

Formal annual Site-wide inspections and surface cover system monitoring were performed between July 2018 and August 2023. Copies of the associated annual Site wide inspection reports are included in **Appendix A**.

As indicated on the 2023 inspection report, the cover system remains in place and continues to be effective at preventing direct exposure to impacts remaining in the subsurface. Certain conditions were identified during the most recent Site inspection (conducted July 31, 2023), which are summarized below. (The photographs referenced below are provided in the 2023 inspection report included in **Appendix A.**)

- The asphalt cover in the facility parking and driveway areas is in overall good condition. Some settlement cracks were identified within the asphalt during the 2020 inspection and remain present as of the 2023 inspection. However, the cracks remain surficial and there is no exposure to the sub-base or subsurface material. (Photographs 1-8, Photograph 16).
- The oil stone chips are present beneath the transmission towers. The oil stone cover preventing exposure to subsurface soil at these locations appears to be intact. It appears that the oil stone chips have been replenished under the northwestern tower, but not the northeastern tower. Replacement of oil stone chips under the northeastern tower should be considered to prevent exposure of soil in the future (Photograph 10). Raised-bed gardens have been added under the northwestern transmission tower (Photograph 9); however, these gardens are wholly contained within planters (i.e., galvanized steel water trough/stock tanks) and are not filled with or in contact with on-Site soil.
- The pole rack along the northwestern fence line was covered with equipment and the oil stone chips in area beneath were minimally visible. The condition of the oil stone chips, and possible vegetation growth was assessed to the extent possible and found to be competent based on visual observations (Photograph 17).
- Consistent with previous inspections, there is some erosion of the oil stone chips on the sloped areas adjacent to the southwestern side of the building (Photograph 11). Soil is exposed in this area where there appears to be further erosion of the concrete platform above the slope. Vegetation was present during the 2023 inspection, along with debris and equipment. The oil stone chips, asphalt, and concrete are still present and preventing exposure to the underlying soil at most locations. However, because the oil chips were placed in this area to protect the integrity of the asphalt cover, future maintenance and/or replacement of the oil chips in this area should be considered to prevent further erosion.
- The pavement patch for the emergency generator installed in 2017 continues to be maintained in good condition (Photograph 13).
- The pavement on Lot 48 west of the fence-line and east of the railroad is in overall good condition. Minor cracks were observed consistent with observations during recent annual inspections. However, the cracks remain surficial and there is no exposure to the subsurface soil.
- The concrete floor of the facility building is in good condition (Photograph 14).
- The perimeter fence is in good condition (Photograph 1, 12, 16).
- There was no evidence of unauthorized use (i.e., no evidence of excavation, construction, groundwater use, or farming in the Site soil, etc.).

- Although not a part of the surface cover inspection, the on-Site monitoring wells were also observed. The concrete pad and well cap at MW-10S are cracked (Photograph 15) such that the well's surface completion components should be replaced. The concrete pad for monitoring well MW-5B is also cracked but remains competent. MW-8S, MW-8B, and MW-11S were uncovered from under accumulated soil/debris, but competent. Monitoring well EXW5 could not be found in 2023.

Overall, the surface cover system was found to be functioning as designed in accordance with the details provided in the Final Engineering Report (RUST, 1998).

Additional "as needed" controls are also identified in the SMP, including provisions for intrusive work. Specifically, the Excavation Work Plan provided as Appendix A of the SMP outlines the procedures required to be implemented in the event the cover system is breached, penetrated, or temporarily removed, and any underlying remaining contamination is disturbed. Work conducted pursuant to the Excavation Work Plan must also be conducted in accordance with the procedures defined in a Health and Safety Plan (HASP), and Community Air Monitoring Plan (CAMP) prepared for the Site.

4. Monitoring Compliance

4.1 Groundwater Monitoring

Based on the Record of Decision for the Former Grant Hardware Facility Site (NYSDEC # 344031) and investigation findings related to the WNOC Site, groundwater impacts on the WNOC Site are from this off-Site upgradient source. The WNOC SMP states that any further groundwater monitoring will be completed by the Potentially Responsible Party (PRP) for the Grant Hardware Site. Therefore, groundwater sampling is not part of the WNOC SMP and is not conducted by O&R. Site access will be provided to the potentially responsible party for the Former Grant Hardware Site and their representatives to complete any required groundwater sampling, if/when needed.

Access to the WNOC Site for groundwater monitoring has not been requested during this reporting period.

4.2 Monitoring Well Repairs, Replacement, and Decommissioning

A network of monitoring wells was installed to monitor both upgradient and downgradient groundwater conditions at the Site. As noted in Section 4.1, Site access will be provided to the PRP for the former Grant Hardware Site and their representatives to complete any required groundwater sampling.

In the meantime, the surface conditions of the on-Site monitoring wells are assessed during Site inspection and cover monitoring events. Most recently in 2023, a damaged protective casing for groundwater monitoring well MW-10S (**Figure 2**) was identified and will be repaired. The remainder of the on-Site monitoring wells were observed in functional condition.

4.3 Soil Vapor Intrusion Monitoring

No new structures were built; therefore, no soil vapor intrusion sampling was conducted during this reporting period.

5. Conclusions and Recommendations

5.1 Conclusions

A copy of the NYSDEC Institutional and Engineering Controls Certification Form is included as **Appendix B**. The institutional and engineering controls established in the SMP were complied with during the reporting period, as discussed in Section 4. The institutional and engineering controls have proved effective in preventing uncontrolled exposure to remaining subsurface impacts on Site.

5.2 Recommendations

The engineering controls are in overall good condition and functioning as designed. Certain maintenance activities are recommended based on the most recent annual inspection to maintain the engineering controls and prevent future potential exposures. These recommendations are summarized below:

- Continued control of vegetation in all oil stone chip areas to prevent it from compromising the integrity of the cover material; and
- Replacement or future maintenance of the oil chips on the sloped areas adjacent to the southwestern side of the building and beneath the northeastern transmission tower to prevent further erosion.

5.3 Schedule of Future Activities

O&R will perform the recommended maintenance at their earliest availably, no later than the next annual inspection in 2024.

Annual Site-wide inspections and annual cover system monitoring will continue to be performed in accordance with the SMP unless or until NYSDEC authorizes modification to the SMP. The next planned Site-wide inspection and cover system monitoring will be performed during the summer of 2024.

The SMP states that a PRR will be submitted to the NYSDEC every fifth year. The next PRR submittal will be in August 2028. The results of the 2024 through 2028 annual Site-wide inspections and annual cover system monitoring will be provided to the NYSDEC in the August 2028 PRR.

6. References

Rust Environment and Infrastructure (RUST), 1996. *Remedial Investigation Report, Orange and Rockland Utilities, Inc., Inactive Hazardous Waste Disposal (I.D. # 344014), West Nyack, NY*, July 1996.

RUST, 1997a. *Feasibility Study Report, Orange and Rockland Utilities, Inc., West Nyack, New York, Inactive Hazardous Waste Disposal Site (I.D. # 344014)*, March 1997; Amended July 1997.

RUST, 1997b. *Remedial Plan, O&R Inactive Hazardous Waste Disposal Site (ID #344014, West Nyack, NY*, September 1997.

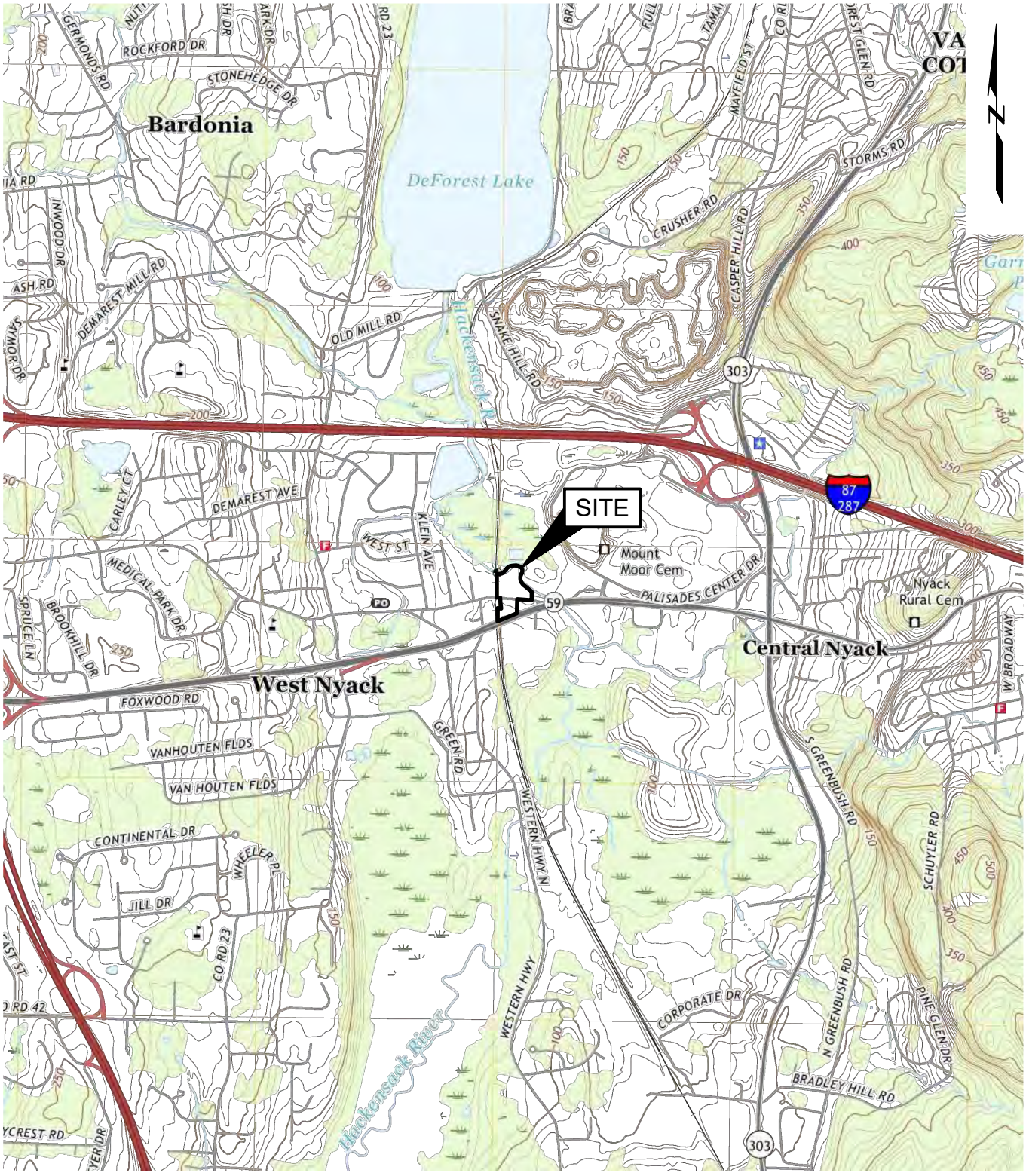
RUST, 1998, *Certification Report, O&R Inactive Hazardous Waste*

Disposal Site (I.D. # 344014), West Nyack, NY, June 1998.

Tetra Tech EC, Inc., 2005. *Supplemental Subsurface Investigation, Orange and Rockland Utilities, Inc., West Nyack Operating Center, 766 West Nyack Road, West Nyack, New York*, August 2005.

AECOM, 2012, *Site Management Plan Orange and Rockland Utilities (West Nyack Operating Center) 180 West Nyack Road, West Nyack, NY 10994, NYSDEC Site Number: 344014*, July 2012.

Figures



SOURCE:

NYACK, NY, NJ QUADRANGLE, USGS TOPOGRAPHIC MAP, 7.5-MINUTE SERIES, 2019.

0 2000' 4000'

SCALE: 1" = 2000'

2023 Periodic Review Report West Nyack Operating Center West Nyack, New York	GEI Consultants	SITE LOCATION MAP
Orange and Rockland Utilities, Inc. Spring Valley, New York	Project 2101712	August 2023 Fig. 1

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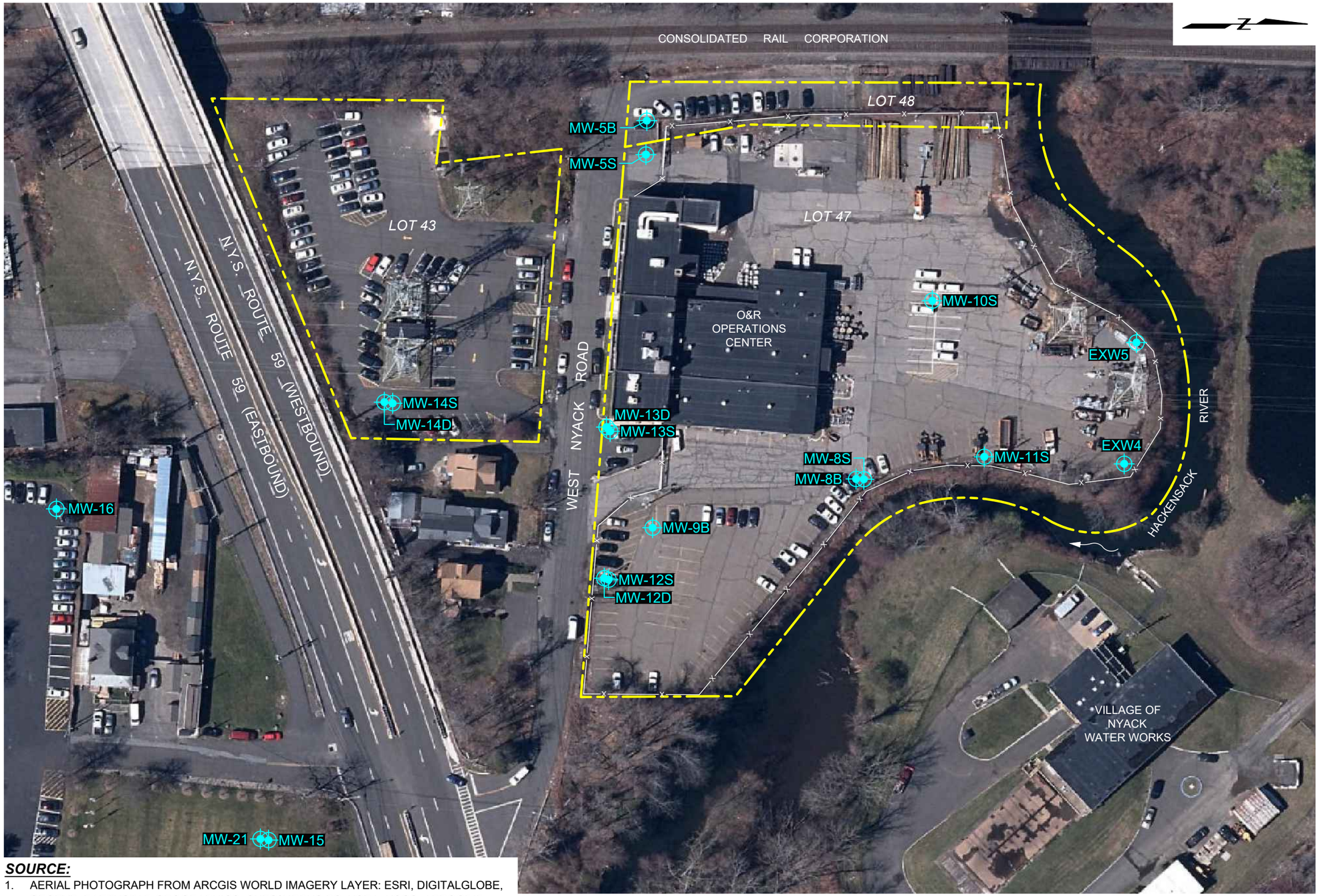

LEGEND:

- MONITORING WELL
- PROPERTY BOUNDARY
- CHAIN-LINK FENCE

SOURCE:

1. AERIAL PHOTOGRAPH FROM ARCGIS WORLD IMAGERY LAYER: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEROGRID, IGN, AND THE GIS USER COMMUNITY, IMAGE DATE 3/12/2016, ACCESSED ON 8/13/2018.
2. *FIGURE 1-2: CURRENT SITE LAYOUT AND MONITORING WELL LOCATIONS,* PREPARED BY AECOM, DATE: 3/25/09, SCALE: 1" = 140'.
3. *TAX MAP,* SHEET 65.05, TOWN OF CLARKSON, ROCKLAND COUNTY, NEW YORK, REVISED THROUGH FEBRUARY 28, 2018, SCAKE: 1" = 100'.

0 80 160

SCALE: 1" = 80'

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Spring Valley, New York

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SITE LAYOUT MAP

Project 2101712 | August 2023 | Fig. 2

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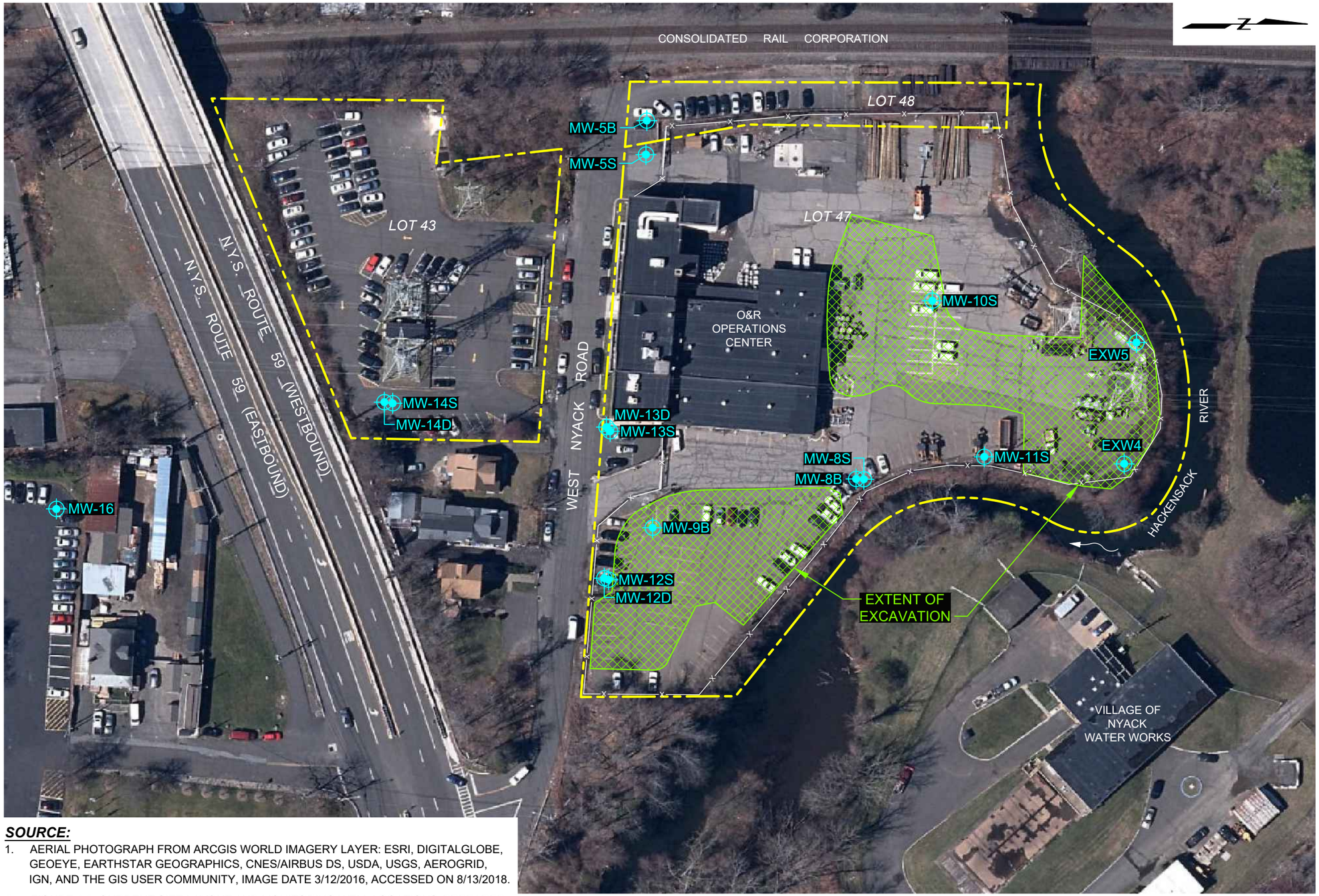

LEGEND:

- MONITORING WELL
- EXTENT OF EXCAVATION
- PROPERTY BOUNDARY
- CHAIN-LINK FENCE

SOURCE:

1. AERIAL PHOTOGRAPH FROM ARCGIS WORLD IMAGERY LAYER: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEROGRID, IGN, AND THE GIS USER COMMUNITY, IMAGE DATE 3/12/2016, ACCESSED ON 8/13/2018.
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3. *TAX MAP,* SHEET 65.05, TOWN OF CLARKSON, ROCKLAND COUNTY, NEW YORK, REVISED THROUGH FEBRUARY 28, 2018, SCAKE: 1" = 100'.
4. EXCAVATION EXTENTS FROM FIGURE 2: SITE LAYOUT, PREPARED BY AECOM, SCALE: 1" = 120', DATE: 2/15/2012.

0 80 160

SCALE: 1" = 80'

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West Nyack, New York

Orange and Rockland Utilities, Inc.
Spring Valley, New York

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REMEDIAL ACTION
EXCAVATION EXTENT

Project 2101712 | August 2023 | Fig. 3

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Appendix A

Site-Wide Inspection and Surface Cover System Monitoring Reports

- **2023 Report**
- **2022 Report**
- **2020 Report**
- **2021 Report**
- **2019 Report**

Consulting Engineers and Scientists

August 28, 2023
Project 2101712

Mr. Matthew Levinson
Senior Scientist - EH&S Remediation
Consolidated Edison Company of New York, Inc.
31-01 20th Avenue, Building 138, 2nd Floor
Long Island City, NY 11105-2048

Dear Mr. Levinson:

Re: 2023 Annual Inspection Report
West Nyack Operating Center
766 West Nyack Road, West Nyack, New York
NYSDEC Site No. 344031

GEI Consultants, Inc., P.C. has prepared this Annual Inspection Report on behalf of Consolidated Edison Company of New York (Con Edison) for the Orange and Rockland Utilities, Inc. (O&R) West Nyack Operating Center (WNOC). This letter documents the results of the annual Site-Wide Inspection and annual Composite Cover System Monitoring that was performed on July 31, 2023. The inspection and monitoring were performed in accordance with the New York State Department of Environmental Conservation (NYSDEC) approved WNOC Site Management Plan (SMP), dated July 2012.

Project Background

The Site is located at 766 West Nyack Road (formerly 180 West Nyack Road) in the Town of Clarkstown, Village of West Nyack, County of Rockland, New York, and is identified as Block 2 and Lots 47 and 48 on the Clarkstown Tax Map.[1] Figure 1 shows the Site location. The Site is an approximately 3-acre area bounded by Hackensack River to the north and east, Old Nyack Turnpike (also called West Nyack Road) to the south, and Consolidated Rail Corporation (Conrail) rail tracks to the west (Figure 2). South of the Site, directly across Route 59, is the Grant Hardware Site (NYSDEC # 344031).

The O&R WNOC facility is currently used as a satellite service center for O&R line crews. The facility includes a fueling station for utility service trucks, parking space for O&R vehicles, equipment storage, and office space for personnel. From the 1920s to approximately 1981, transformers, capacitors and other electrical equipment were stored and repaired at the facility. Two underground storage tanks (USTs) were previously located in the center of the Site and used to store gasoline for fueling O&R's utility vehicles. One tank was identified as leaking and was removed in 1989. The second tank was removed during remedial actions conducted in 1997 and 1998.

1 O&R also owns Lot 43 south of West Nyack Road. This property is used for employee parking for the O&R facility and was not part of the remedial actions for the Site. Lot 43 is not included in the engineering controls described in the Site Management Plan (SMP) and is not further discussed herein.

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The Site was investigated and remediated in accordance with Order on Consent Index # W3-0508-93-12, Site # 344014, which was executed on August 2, 1994. A Remedial Investigation (RUST, 1996), a Feasibility Study (RUST, 1997a) and an additional Supplemental Subsurface Investigation (Tetra Tech, 2005) were performed to characterize the nature and extent of impacts. The results of these investigations indicated the subsurface soil in the vicinity of the UST area exhibited elevated petroleum-related volatile organic compound (VOC) concentrations. The depth of petroleum-impacted soil ranged from 1 foot to 14 feet below grade. Limited Polychlorinated Biphenyl (PCB) impacts in subsurface soil were also identified.

The Site was remediated in 1997 and 1998 in accordance with the NYSDEC-approved Remedial Action Work Plan (RAWP) dated September 1997 (RUST, 1997b). A Record of Decision (ROD) was issued in October 1997. Remedial activities were initiated in November 1997 and completed in April 1998 (RUST, 1998), and included:

- Excavation of 9,328 cubic yards of soil containing petroleum-related VOCs and PCBs in excess of NYSDEC recommended cleanup levels (0.06 mg/kg benzene and 1.2 mg/kg xylene and 10 mg/kg PCBs). The extent of excavation is shown on Figure 3.
- Placement of a composite cover system over remaining soil impacts. This cover consists of 12 inches of structural sub-base, 3 inches of binder course, and 1 ½ inches of wearing course placed in the excavated areas, and 3 inches of binder course and 1 ½ inches of wearing course placed over the majority of the remainder of the Site. In driveway areas that were already paved, Petro- Mats® were laid over the existing pavement and covered with approximately 1 ½ inches of wearing course. Additionally, several inches of oil stone chips were placed in areas where asphalt was not used, including beneath the transmission towers in the northernmost portion of the Site, the pole rack on western side of the Site, and areas immediately adjacent to the rear of the facility building to protect the integrity of the cover system. Security fencing was also replaced around the Site.
- Development and implementation of a SMP for long term management of remaining contamination (AECOM, 2012).

2023 Site-Wide Inspection

The SMP specifies that Site-wide inspections be performed a minimum of once per year and documented on a Site-wide inspection form (Annual Site-Wide Inspection and Cover System Monitoring Checklist). The inspection assesses the following:

- Compliance with Institutional Controls (ICs), including Site usage
- Condition and continued effectiveness of Environmental Controls (ECs)
- General Site conditions at the time of the inspection
- That Site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection
- That Site records are up to date

The 2023 annual inspection was conducted by GEI and O&R on July 31, 2023. Appendix A includes a copy of the completed 2023 Annual Site-Wide Inspection and Cover System Monitoring Checklist .

There was no evidence of new or removed structures, unauthorized entry, damage to entrances or exits, illegal dumping, or unusual odors.

There were some housekeeping issues identified but none of the housekeeping issues impacted the effectiveness of the Institutional or Engineering Controls. Site usage and ownership has not changed as of the date of the 2023 inspection.

Cover System Monitoring

The SMP specifies that a visual inspection of the complete cover system will also be conducted on an annual basis concurrently with the Site-wide inspection. The composite cover system inspection assesses the following:

- Integrity of asphalt-covered roads (specifically, paved roadways and parking areas, as well as oil stone chips);
- Integrity of sidewalks;
- Integrity of concrete building slabs
- Integrity of "clean soil cover/cap" (i.e., 12 inches clean soil below asphalt and oil stone chips in excavation areas [Figure 3])

The following visual observations of the cover system integrity were made during the August 2023 monitoring event. The photographs referenced below are provided in Appendix B.

- The asphalt cover in the facility parking and driveway areas is in overall good condition. Some settlement cracks were identified within the asphalt during the 2020 inspection and remain present as of the 2023 inspection. However, the cracks remain surficial and there is no exposure to the sub-base or subsurface material. (Photographs 1-8, Photograph 16).
- The oil stone chips are present beneath the transmission towers. The oil stone cover preventing exposure to subsurface soil at these locations appears to be intact. It appears that the oil stone chips have been replenished under the northwestern tower, but not the northeastern tower. Replacement of oil stone chips under the northeastern tower should be considered to prevent exposure of soil in the future (Photograph 10). Raised-bed gardens have been added under the northwestern transmission tower (Photograph 9); however, these gardens are wholly contained within planters (i.e., galvanized steel water trough/stock tanks) and are not filled with or in contact with on-Site soil.
- The pole rack along the northwestern fence line was covered with equipment and the oil stone chips in area beneath were minimally visible. The condition of the oil stone chips, and possible vegetation growth was assessed to the extent possible and found to be competent based on visual observations (Photograph 17).
- Consistent with previous inspections, there is some erosion of the oil stone chips on the sloped areas adjacent to the southwestern side of the building (Photograph 11). Soil is exposed in this area where there appears to be further erosion of the concrete platform above the slope. Vegetation was present during the 2023 inspection, along with debris and equipment. The oil stone chips, asphalt, and concrete are still present and preventing exposure to the underlying soil at most locations. However, because the oil chips were placed in this area to protect the integrity of the asphalt cover, future maintenance and/or replacement of the oil chips in this area should be considered to prevent further erosion.
- The pavement patch for the emergency generator installed in 2017 continues to be maintained in good condition (Photograph 13).
- The pavement on Lot 48 west of the fence-line and east of the railroad is in overall good condition.

- Minor cracks were observed consistent with observations during recent annual inspections. However, the cracks remain surficial and there is no exposure to the subsurface soil.
- The concrete floor of the facility building is in good condition (Photograph 14).
- The perimeter fence is in good condition (Photograph 1, 12, 16).
- There was no evidence of unauthorized use (i.e., no evidence of excavation, construction, groundwater use, or farming in the Site soil, etc.).
- Although not a part of the surface cover inspection, the surface conditions of the on-Site monitoring wells were also observed. The concrete pad and well cap at MW-10S are cracked (Photograph 15) such that the well's surface completion components should be replaced. The concrete pad for monitoring well MW-5B is also cracked, but remains competent. MW-8S, MW-8B, and MW-11S were uncovered from under accumulated soil/debris, but competent. Monitoring well EXW5 could not be found in 2023.

Compliance with SMP

The institutional and engineering controls established in the SMP were complied with during this reporting period. Site-wide inspections and cover system monitoring will continue to be performed annually in accordance with the SMP. The results of the annual Site-wide inspections and cover system monitoring conducted from 2019 through present will be provided to the NYSDEC in the next Periodic Review Report (PRR) (see below).

IC/EC Compliance

The cover system remains largely intact. The institutional and engineering controls appear to remain effective in preventing uncontrolled exposure to remaining subsurface impacts beneath the cover system.

Some exposure of soil due to the erosion of oil stone chips on a sloped area adjacent to the building was identified. Additionally, the oil stone chips under the northeastern transmission tower are thinning. Repair/replenishment of the oil stone chips should be considered in these areas, as further discussed above. The damaged MW-10S surface completion should also be replaced.

Future Inspections and Periodic Review Report Submittals

The next Site-wide inspection and cover system monitoring will be performed during summer 2024.

In accordance with the SMP, a PRR will be submitted to the Department every fifth year; with the next PRR submittal scheduled for August 2023. The 2019 through 2023 annual Site-wide inspection and cover system monitoring reports will be attached to this PRR.

If you have any questions, please feel free to contact us at (607) 216-8966.

Sincerely,

GEI CONSULTANTS, INC., P.C.

Wendy Moore, P.E.
Project Manager

Matthew O'Neil, P.E.
Senior Engineer

WM/MO:tc
Attachments:

Figures

1. Site Location Map
2. Site Layout Map
3. Remedial Action Excavation Extent

Appendices

A. Annual Site-Wide Inspection and Cover System Monitoring Checklist
B. Photo Documentation (including photolog and photo location map)

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Rust Environment and Infrastructure (RUST), 1996. *Remedial Investigation Report, Orange and Rockland Utilities, Inc., Inactive Hazardous Waste Disposal (I.D. # 344014), West Nyack, NY,* July 1996.

RUST, 1997a. *Feasibility Study Report, Orange and Rockland Utilities, Inc., West Nyack, New York, Inactive Hazardous Waste Disposal Site (I.D. # 344014),* March 1997; Amended July 1997.

RUST, 1997b. *Remedial Plan, O&R Inactive Hazardous Waste Disposal Site (ID #344014, West Nyack, NY,* September 1997.

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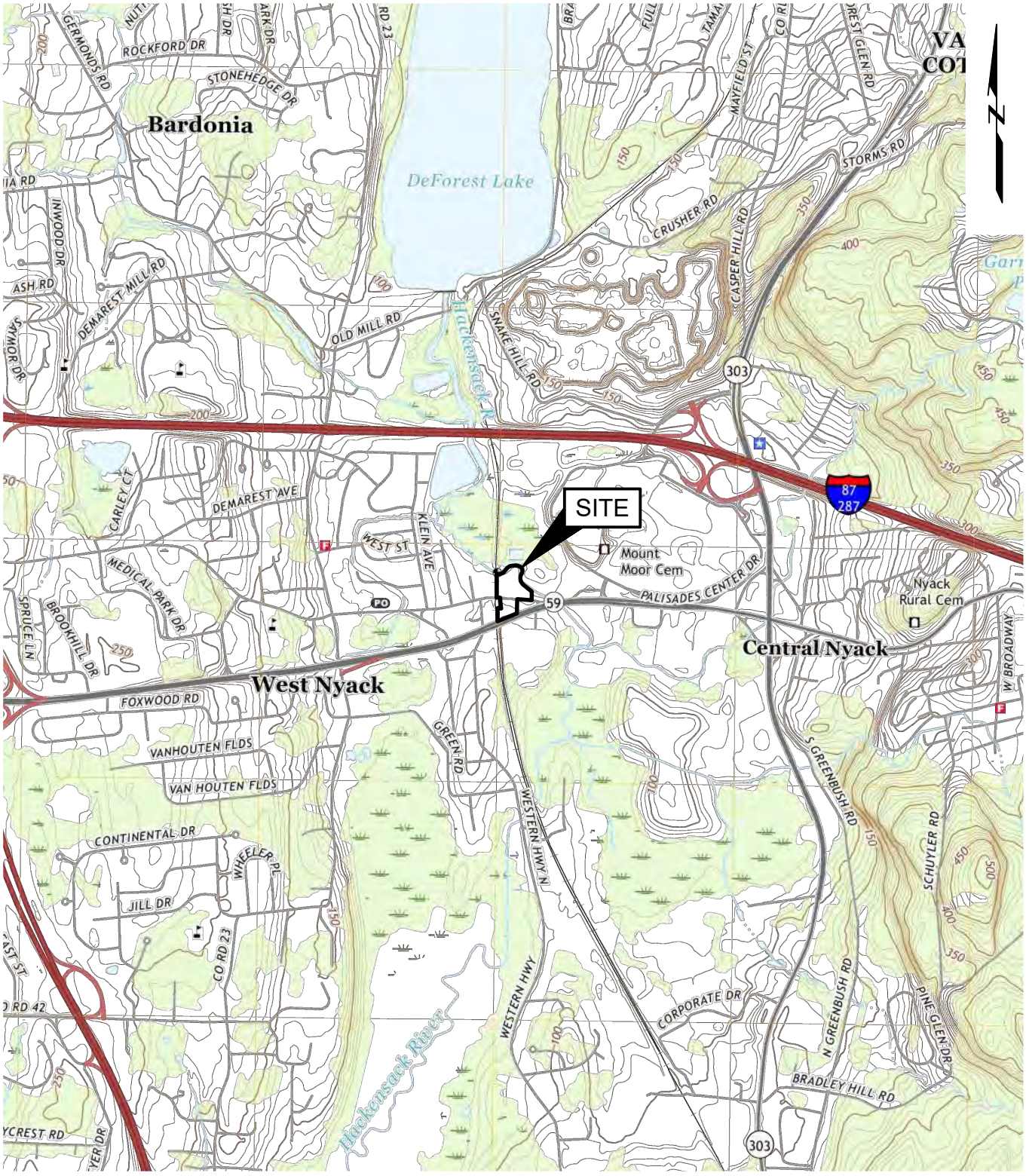
Tetra Tech EC, Inc., 2005. *Supplemental Subsurface Investigation, Orange and Rockland Utilities, Inc., West Nyack Operating Center, 766 West Nyack Road, West Nyack, New York,* August 2005.

AECOM, 2012, *Site Management Plan Orange and Rockland Utilities (West Nyack Operating Center) 180 West Nyack Road, West Nyack, NY 10994, NYSDEC Site Number: 344014,* July 2012.

Figures



SOURCE:

NYACK, NY, NJ QUADRANGLE, USGS TOPOGRAPHIC MAP, 7.5-MINUTE SERIES, 2019.

0 2000' 4000'

SCALE: 1" = 2000'

2023 Annual Inspection Report West Nyack Operating Center West Nyack, New York	GEI Consultants	SITE LOCATION MAP
Orange and Rockland Utilities, Inc. Spring Valley, New York	Project 2101712	August 2023 Fig. 1

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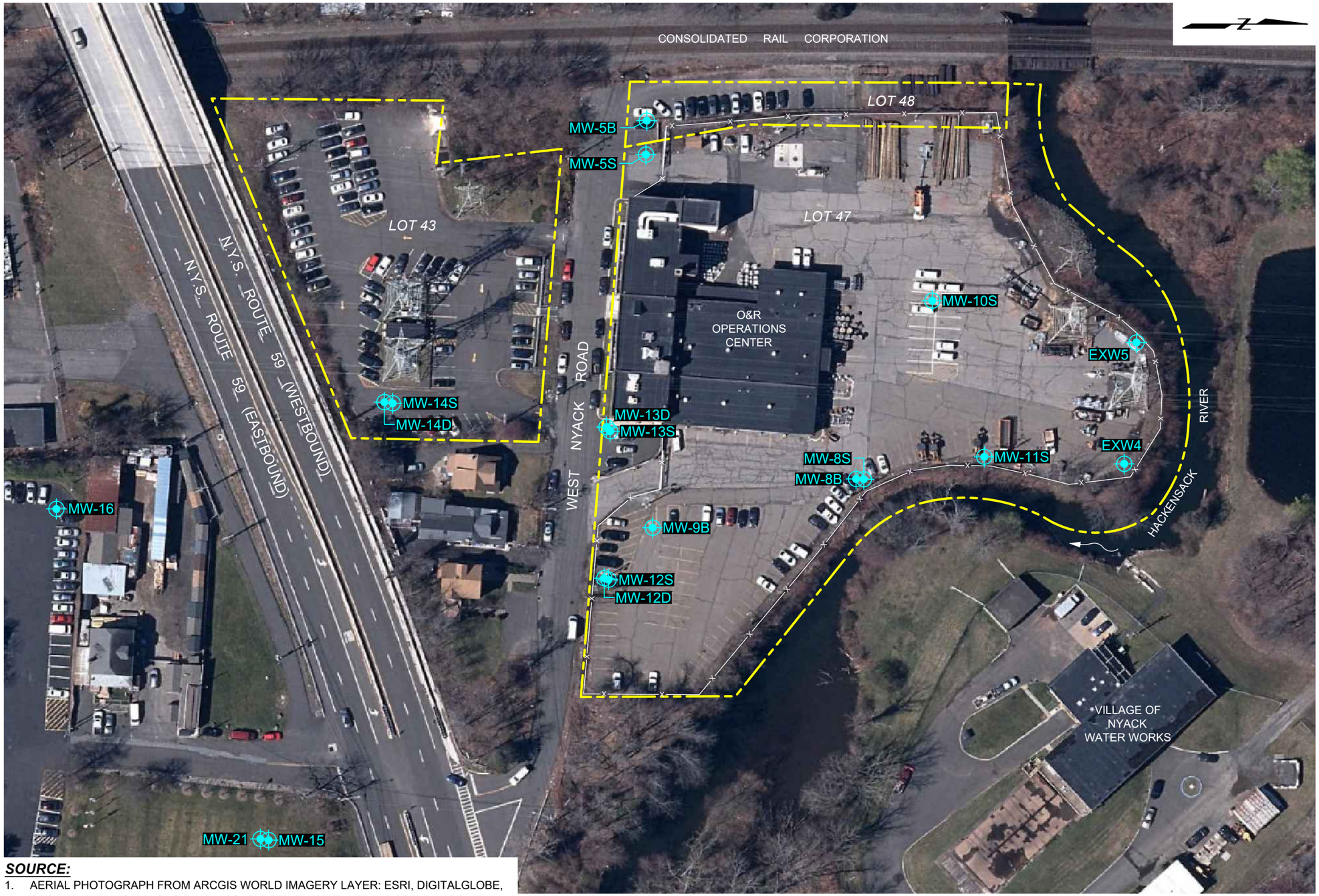

LEGEND:

- MONITORING WELL
- PROPERTY BOUNDARY
- CHAIN-LINK FENCE

SOURCE:

1. AERIAL PHOTOGRAPH FROM ARCGIS WORLD IMAGERY LAYER: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEROGRID, IGN, AND THE GIS USER COMMUNITY, IMAGE DATE 3/12/2016, ACCESSED ON 8/13/2018.
2. *FIGURE 1-2: CURRENT SITE LAYOUT AND MONITORING WELL LOCATIONS,* PREPARED BY AECOM, DATE: 3/25/09, SCALE: 1" = 140'.
3. *TAX MAP,* SHEET 65.05, TOWN OF CLARKSON, ROCKLAND COUNTY, NEW YORK, REVISED THROUGH FEBRUARY 28, 2018, SCAKE: 1" = 100'.

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SCALE: 1" = 80'

2023 Annual Inspection Report
West Nyack Operating Center
West Nyack, New York

Orange and Rockland Utilities, Inc.
Spring Valley, New York

GEI Consultants

SITE LAYOUT MAP

Project 2101712 | August 2023 | Fig. 2

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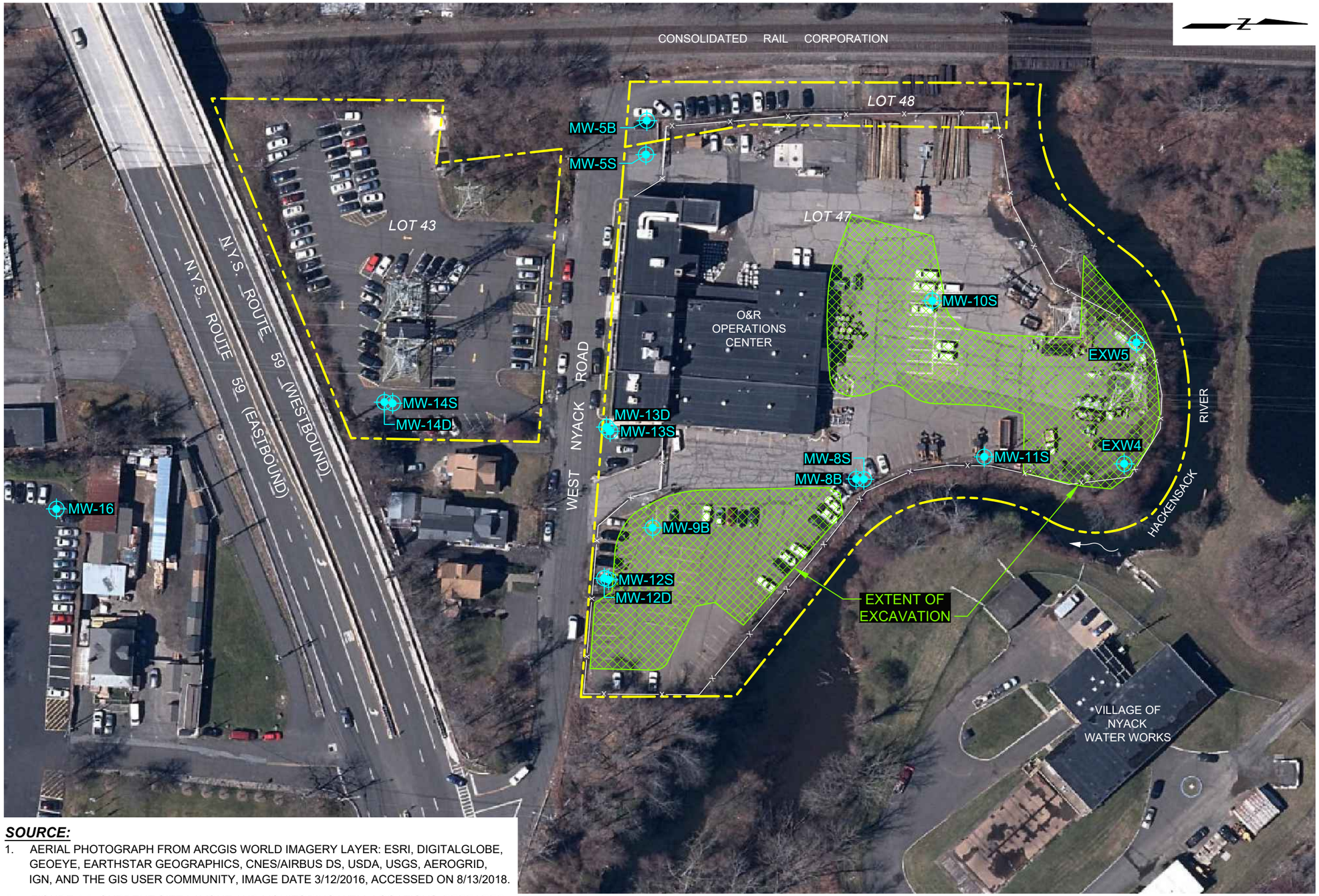

LEGEND:

- MONITORING WELL
- EXTENT OF EXCAVATION
- PROPERTY BOUNDARY
- CHAIN-LINK FENCE

SOURCE:

1. AERIAL PHOTOGRAPH FROM ARCGIS WORLD IMAGERY LAYER: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEROGRID, IGN, AND THE GIS USER COMMUNITY, IMAGE DATE 3/12/2016, ACCESSED ON 8/13/2018.
2. *FIGURE 1-2: CURRENT SITE LAYOUT AND MONITORING WELL LOCATIONS,* PREPARED BY AECOM, DATE: 3/25/09, SCALE: 1" = 140'.
3. *TAX MAP,* SHEET 65.05, TOWN OF CLARKSON, ROCKLAND COUNTY, NEW YORK, REVISED THROUGH FEBRUARY 28, 2018, SCAKE: 1" = 100'.
4. EXCAVATION EXTENTS FROM FIGURE 2: SITE LAYOUT, PREPARED BY AECOM, SCALE: 1" = 120', DATE: 2/15/2012.

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SCALE: 1" = 80'

2023 Annual Inspection Report
West Nyack Operating Center
West Nyack, New York

Orange and Rockland Utilities, Inc.
Spring Valley, New York

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REMEDIAL ACTION
EXCAVATION EXTENT

Project 2101712 | August 2023 | Fig. 3

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Appendix A

Annual Site-Wide Inspection and Cover System Monitoring Checklist

Annual Site-Wide Inspection and Soil Cover System Monitoring Checklist

Site: West Nyack Orange and Rockland (WNOC)
Address: 766 West Nyack Road, West Nyack, NY 10994

Date of Inspection: 07/31/23

Weather: 77ºF, Cloudy

Inspector: Francisco Mateo
Company: GEI Consultants, Inc.

O&R Representative: Matthew Levinson

General Site Conditions

Are there any new or removed structures: Yes (No) Comments:

Does the site have proper up keep: (Yes) No Comments:

Evidence of unauthorized entry: Yes (No) Comments:

Damage to entrances/exits: Yes (No) Comments:

Any illegally dumped materials: Yes (No) Comments:

Any unusual odors: Yes (No) Comments:

Are any monitoring wells opened or damaged: (Yes) No Comments:
MW-10S has a cracked head and pad; MW-5B has a cracked but still competent pad; EXW5 could not be located during this inspection.

Engineering Control Systems

The site engineering control systems is a soil cap (composite cover system). Exposure to remaining contamination in soil/fill at the site is prevented by a soil cover system placed over the site. Following remedial actions, the excavated area was backfilled with a combination of clean fill and thermally-treated soils. An impermeable asphalt cap was then placed over the entire site. This cap consists of 12 inches of structural sub-base, 3 inches of binder course, and 1 ½ inches of wearing course placed in the excavated areas, and 3 inches of binder course and 1 ½ inches of wearing course placed over the majority of the remainder of the site. In the driveway areas which were already paved, Petro-Mats® were laid over the existing pavement and covered with approximately 1 ½ inches of wearing course. Additionally, several inches of oiled stone chips were placed beneath the transmission towers in the northernmost portion of the site, as well as in the areas immediately adjacent to the rear of the building in order to protect the integrity of the asphalt cap.

Note Integrity of:

Asphalt covered roads: (Good) Cracks Holes Stain/Seepage

Comments:

Concrete building slabs: (Good) Cracks Holes Stain/Seepage
Comments:

Clean soil cover/cap: (Good) Cracks Holes Stain/Seepage
Comments: Very slight amount of alligator cracks in some areas; certain areas of oil stone chips are thinning (under northeastern transmission tower and on slope behind building). No

Was maintenance or repair of the capped areas conducted? (Yes) No
Comments: Oil stone chips have been replenished below the northwestern transmission tower.

Security Fencing around the site: (Good) Deficient
Comments:

Institutional Controls (Site Restrictions)

The property may only be used for industrial or commercial use provided that the long-term Engineering and Institutional Controls included in the SMP are employed. (Yes) No

The property may not be used for a higher level of use such as unrestricted or restricted residential use without additional remediation and amendment of the deed restriction, as approved by the NYSDEC. Residential use observed? Yes (No)

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

Was excavation conducted on site? Yes (No)
Was the Excavation Work Plan followed? Yes No (N/A)
Were the CAMP and EHASP followed? Yes No (N/A)
Was there any construction or other disturbances of the cap conducted on site? Yes (No)
Ask for documentation if yes.

The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use. Any potable/non-potable well usage? Yes (No)

The potential for vapor intrusion must be evaluated for any buildings developed in the area while groundwater impacts are still present and any potential impacts that are identified must be monitored or mitigated. New buildings in past year? Yes (No)

Was Soil Vapor Intrusion Sampling Conducted? Yes (No)

Vegetable gardens and farming on the property are prohibited. Observed? Yes (No)

Comments: Raised bed gardens have been installed under one of the transmission towers; however, these gardens are wholly contained within planters (galvanized steel water trough/stock tanks) and are not in contact with on-Site soil.

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 of failure to comply with the SMP. (Yes) No
Ask for documentation if no.

Groundwater Sampling:
Was access granted to representatives of the Former Grant Hardware Facility Site for sampling? Yes (No)
Comments: N/A - None Requested - no sampling necessary/scheduled

Were monitoring well repairs, replacement or decommissioning required? Yes (No)
Comments:

Notifications Required Yes (No)
60-day advance notice of any proposed changes in site use that are required under the terms of the Orders on Consent, 6NYCRR Part 375, and/or Environmental Conservation Law. Yes No (N/A)

7-day advance notice of any proposed ground-intrusive activities pursuant to the Excavation Work Plan. Yes No (N/A)

Notice within 48-hours of any damage or defect to the foundations structures that reduced or has the potential to reduce the effectiveness of the Engineering Control and likewise any action to be taken to mitigate the damage or defect. Yes No (N/A)

Verbal notice by noon of the following day of any emergency, such as a fire, flood, or earthquake that reduces or has the potential to reduce the effectiveness of the Engineering Control in place at the site, with written confirmation within 7 days that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public. Yes No (N/A)

Follow-up status reports on actions taken to respond to any emergency event requiring ongoing responsive action shall be submitted to the NYSDEC within 45 days and shall describe and document actions taken to restore the effectiveness of the ECs. Yes No (N/A)

Any change in the ownership of the site or the responsibility for implementing this SMP will include the following notifications:

At least 60 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser has been provided with a copy of the Orders on Consent, and all approved work plans and reports, including this SMP. Yes No (N/A)

Within 15 days after the transfer of all or part of the site, the new owner's name, contact representative, and contact information will be confirmed in writing. Yes No (N/A)

Ask for documentation if yes.

Contingency Plan

In the event of an emergency condition impacting the Engineering Control or building, O&R will follow its existing emergency procedures and evacuation plan for this facility. As appropriate, the fire department and other emergency response group will be notified immediately by telephone of the emergency.

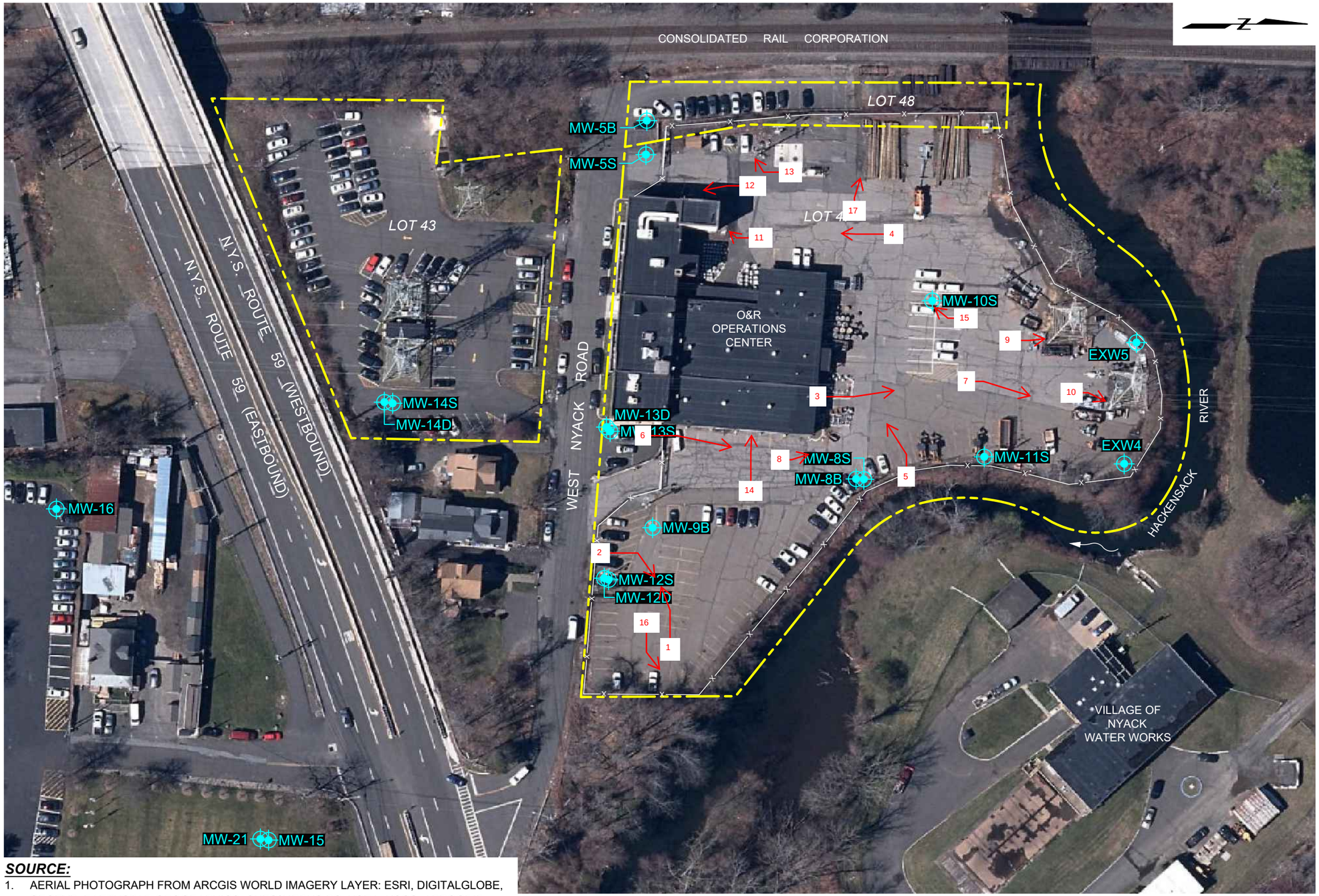
Did an emergency occur in the past year? Yes (No)

Was the fire department or other emergency response group notified immediately?

Yes (No)

Appendix B

Photo Documentation



LEGEND:

- MONITORING WELL
- PROPERTY BOUNDARY
- CHAIN-LINK FENCE
- 1 — LOCATION AND ORIENTATION OF PHOTO DESCRIBED IN PHOTOLOG

SOURCE:

1. AERIAL PHOTOGRAPH FROM ARCGIS WORLD IMAGERY LAYER: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEROGRID, IGN, AND THE GIS USER COMMUNITY, IMAGE DATE 3/12/2016, ACCESSED ON 8/13/2018.
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0 80 160

SCALE: 1" = 80'

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West Nyack Operating Center
West Nyack, New York

Orange and Rockland Utilities, Inc.
Spring Valley, New York

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PHOTO LAYOUT MAP

Project 2101712 | August 2023 | Fig. B

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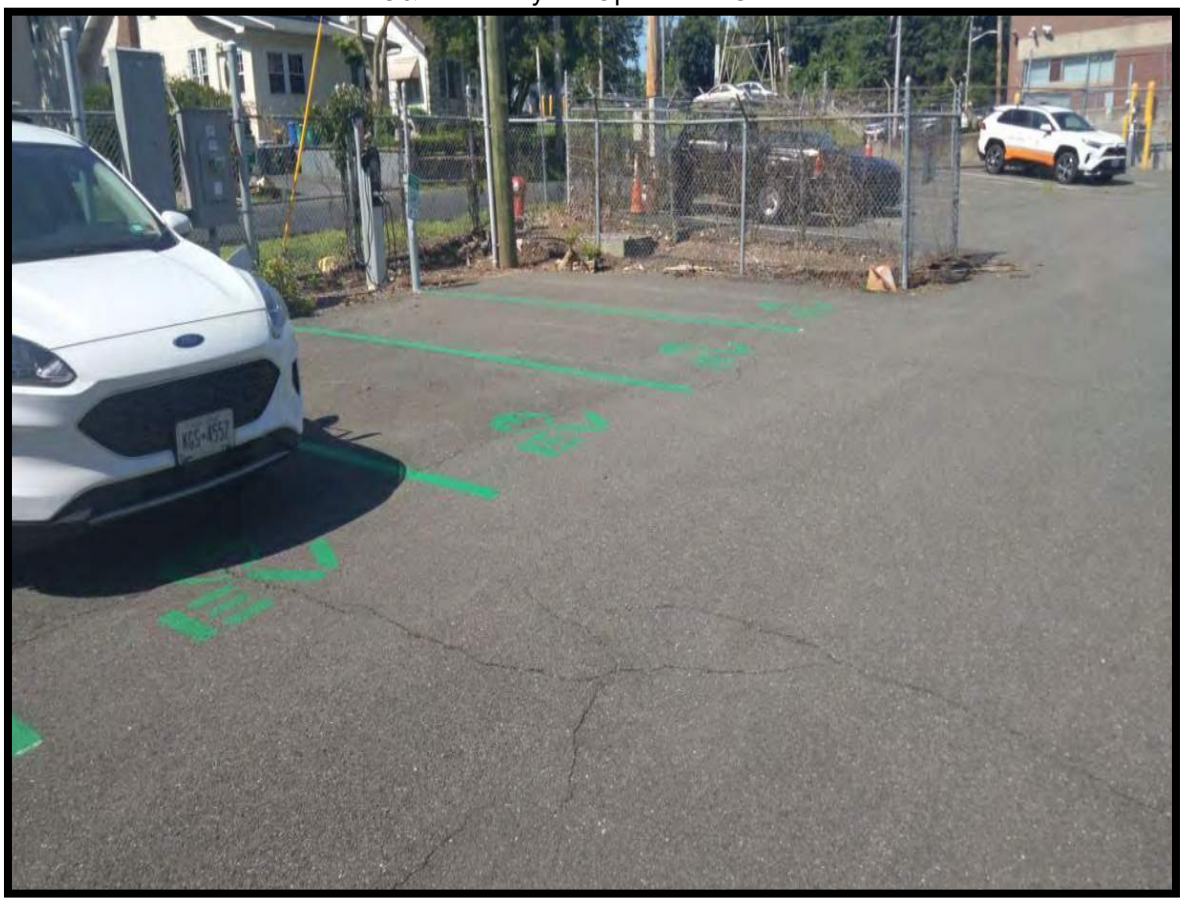
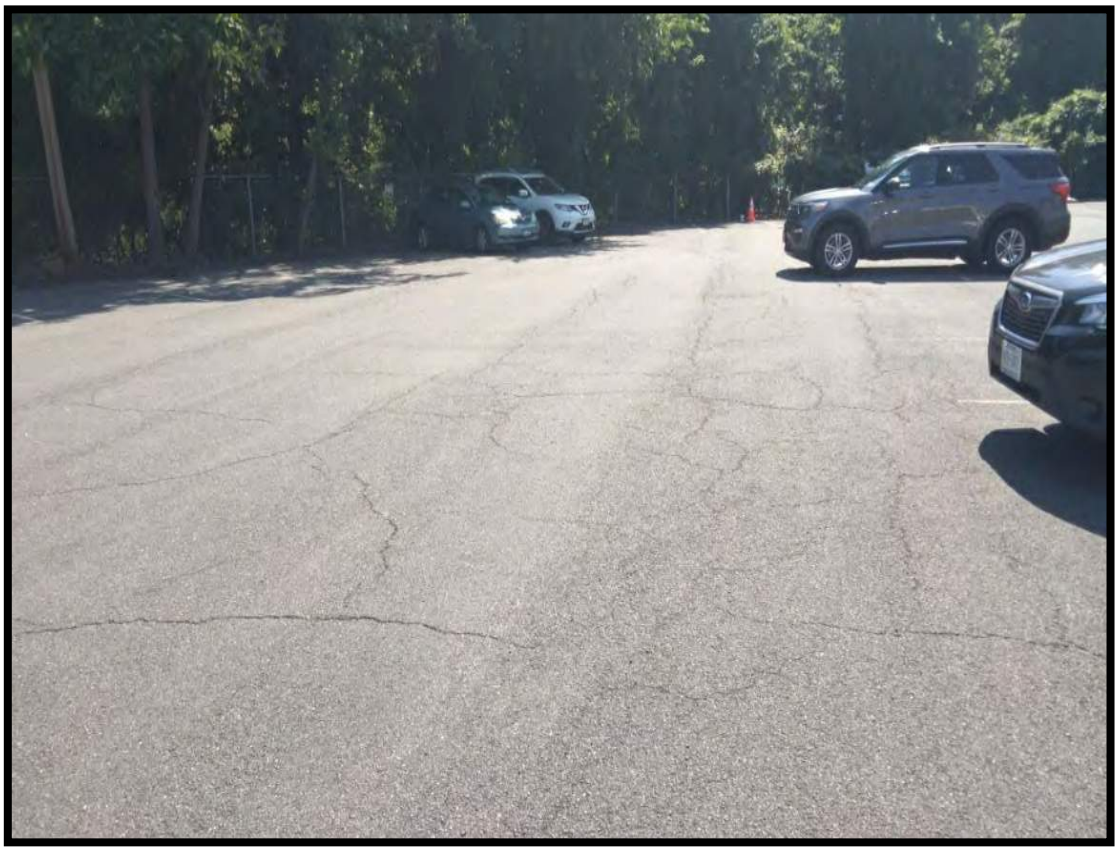
Appendix B
Photo Documentation – July 2023 Site Inspection
O&R West Nyack Operations Center

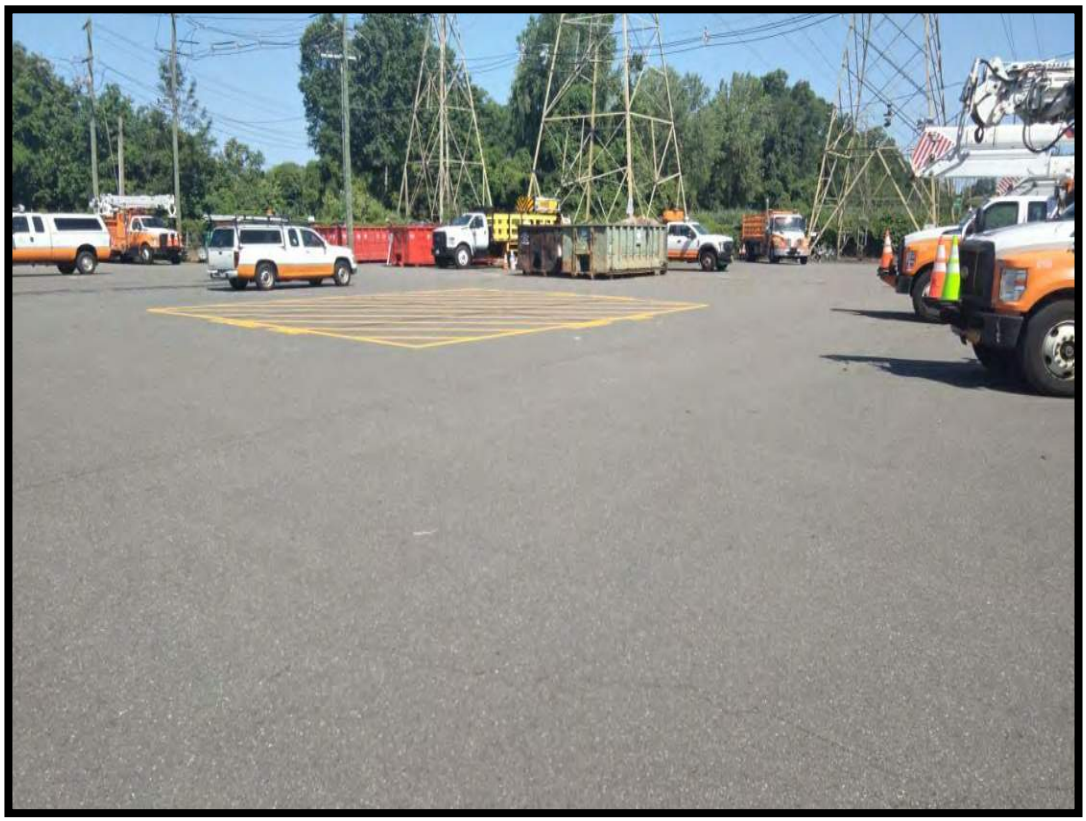


PHOTOGRAPH 1
Pavement and fence in front parking area, fencing – View looking southwest



PHOTOGRAPH 2
Pavement in parking area – View looking northeast

Appendix B
Photo Documentation – July 2023 Site Inspection
O&R West Nyack Operations Center



PHOTOGRAPH 3
Pavement in rear parking lot –View looking north behind buildings

PHOTOGRAPH 4
Pavement in rear of facility – View looking south from behind west side of buildings

Appendix B
Photo Documentation – July 2023 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 5
Pavement behind facility buildings – View looking southwest

PHOTOGRAPH 6
Pavement on east side of facility buildings – View looking north

Appendix B
Photo Documentation – July 2023 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 7
Pavement behind facility buildings– View looking northeast, transmission towers in background

PHOTOGRAPH 8
Pavement to east of buildings – View looking northeast, fence at right

Appendix B
Photo Documentation – July 2023 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 9
Base of northwestern transmission tower – Oil & stone chips present

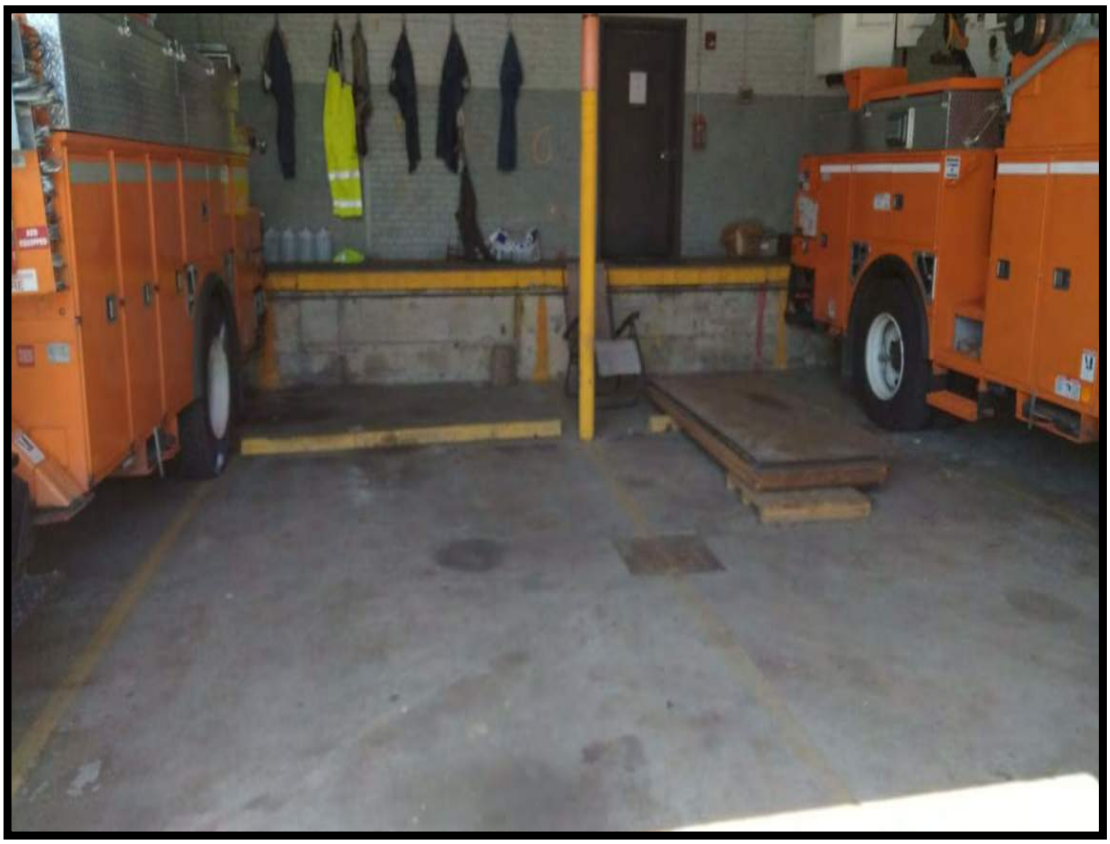
PHOTOGRAPH 10
Base of northeastern transmission tower – Oil & stone chips present, minimal erosion and vegetation

Appendix B
Photo Documentation – July 2023 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 11
Southwest side of building, eastern corner - – Oil & stone chips present, minimal erosion and vegetation

PHOTOGRAPH 12
Western side of building, fencing – Oil & stone chips present, minimal vegetation

PHOTOGRAPH 13
Maintained pavement patch for emergency generator



PHOTOGRAPH 14
Concrete surface inside building

Appendix B
Photo Documentation – July 2023 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 15
MW-10S – Crack in concrete pad and cover

PHOTOGRAPH 16
Fencing in front parking area - view facing east

Appendix B
Photo Documentation – July 2023 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 17
South side of pole rack – View looking east, oil & stone chips present - minimal visibility

Consulting
Engineers and
Scientists

December 12, 2022
Project 2101712

Mr. Raphael Rosenbaum
Scientist - EH&S, MGP Remediation
Consolidated Edison Company of New York
31-01 20th Avenue, Building 138, 2nd Floor
Long Island City, NY 11105-2048

Dear Mr. Rosenbaum:

Re: 2022 Annual Inspection Report
West Nyack Operating Center
766 West Nyack Road, West Nyack, New York

GEI Consultants, Inc., P.C. has prepared this Annual Inspection Report on behalf of Consolidated Edison Company of New York (Con Edison) Orange and Rockland Utilities, Inc. (O&R) West Nyack Operating Center (WNOC). This letter documents the results of the annual Site-Wide Inspection and annual Composite Cover System Monitoring that was performed on August 24, 2022 in accordance with the New York State Department of Environmental Conservation (NYSDEC) approved WNOC Site Management Plan (SMP), dated July 2012.

Project Background

The Site is located at 766 West Nyack Road (formerly 180 West Nyack Road) in the Town of Clarkstown, Village of West Nyack, County of Rockland, New York, and is identified as Block 2 and Lots 47 and 48 on the Clarkstown Tax Map.[1] Figure 1 shows the Site location. The Site is an approximately 3-acre area bounded by Hackensack River to the north and east, Old Nyack Turnpike (also called West Nyack Road) to the south, and Consolidated Rail Corporation (Conrail) rail tracks to the west (Figure 2). South of the Site, directly across Route 59, is the Grant Hardware Site (NYSDEC # 344031).

The O&R WNOC facility is currently used as a satellite service center for O&R line crews with garage facilities and a fueling station for utility service trucks, parking space for O&R vehicles, equipment storage, as well as office space. From the 1920s to approximately 1981, transformers, capacitors and other electrical equipment were stored and repaired at the facility. Two underground storage tanks (USTs) were located in the center of the Site and were used to store gasoline for fueling O&R's utility vehicles. One tank was identified as leaking and was removed in 1989. The second tank was removed during remedial actions conducted in 1997 and 1998.

The site was investigated and remediated in accordance with Order on Consent Index # W3-0508-93-12, Site # 344014, which was executed on August 2, 1994. A Remedial Investigation (Rust, July 1996), a Feasibility Study (Rust, July 1997) and an additional Supplemental Subsurface

1 O&R also owns Lot 43 south of West Nyack Road. This property is used for employee parking for the O&R facility and was not part of the remedial actions for the Site. Lot 43 is not included in the engineering controls described in the Site Management Plan (SMP).

Investigation (Tetra Tech, 2005) were performed to characterize the nature and extent of contamination at the site. The results of these investigations indicated the subsurface soil in the vicinity of the UST area exhibited elevated petroleum-related volatile organic compound (VOC) concentrations. The depth of petroleum-impacted soil ranged from 1 foot to 14 feet. Limited Polychlorinated Biphenyl (PCB) impacts in subsurface soil were also identified.

The site was remediated in 1997 and 1998 in accordance with the NYSDEC-approved Remedial Action Work Plan (RAWP) dated September 1997. A Record of Decision (ROD) was issued in October 1997. Remedial activities were initiated by O&R in November 1997 and completed in April 1998 (RUST, 1998),and included:

- Excavation of 9,328 cubic yards of soil containing petroleum-related VOCs and PCBs in excess of NYSDEC recommended cleanup levels (0.06 mg/kg benzene and 1.2 mg/kg xylene and 10 mg/kg PCBs). The extent of excavation is shown on Figure 3.
- Placement of a composite cover system over remaining soil impacts. This cap consists of 12 inches of structural sub-base, 3 inches of binder course, and 1 ½ inches of wearing course placed in the excavated areas, and 3 inches of binder course and 1 ½ inches of wearing course placed over the majority of the remainder of the Site. In driveway areas that were already paved, Petro- Mats® were laid over the existing pavement and covered with approximately 1 ½ inches of wearing course. Additionally, several inches of oiled stone chips were placed beneath the transmission towers in the northernmost portion of the Site, as well as in the pole rack and areas immediately adjacent to the rear of the building in order to protect the integrity of the cover system. Security fencing was replaced around the Site as well.
- Development and implementation of a SMP for long term management of remaining contamination (AECOM, July 2012).

2022 Site-Wide Inspection

The SMP specifies that site-wide inspections be performed a minimum of once per year and documented on a site-wide inspection form (Annual Site-Wide Inspection and Cover System Monitoring Checklist). The inspection assesses the following:

- Compliance with Institutional Controls (ICs), including Site usage
- Condition and continued effectiveness of Environmental Controls (ECs)
- General Site conditions at the time of the inspection
- That Site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection
- That Site records are up to date

The 2022 annual inspection was conducted by GEI on August 24, 2022. A copy of the Annual Site-Wide Inspection and Cover System Monitoring Checklist is included in Appendix A.

There was no evidence of unauthorized entry, damage to entrances or exits, illegal dumping, or unusual odors. There were some housekeeping issues identified but none of the housekeeping issues impacted the effectiveness of the Institutional or Engineering Controls. Site usage and ownership has not changed as of the date of the 2022 inspection.

A damaged protective casing for groundwater monitoring well MW-5B located outside the fence line on the southern portion of Lot 48 was repaired in 2022. Specifically, the damaged road box

was removed and a replacement riser, cement box, J-plug, and steel cap were installed (Photograph 16 in Appendix B). The PVC riser pipe is slightly cracked but intact. Air Monitoring was implemented within the work zone, with no observed impacts.

Cover System Monitoring

The SMP specifies that a visual inspection of the complete cover system will also be conducted on an annual basis concurrently with the Site-wide inspection. The composite cover system inspection assesses the following:

- Integrity of asphalt-covered roads
- Integrity of sidewalks
- Integrity of concrete building slabs
- Integrity of "clean soil cover/cap"

The following visual observations of the cover system integrity were made during the August 2022 site walk. The photographs referenced below are provided in Appendix B.

- The asphalt cap in the parking and driveway areas is in overall good condition. Some settlement cracks were identified within the asphalt during the 2020 inspection and remain present as of the 2022 inspection. However, the cracks remain surficial and there is no exposure to the sub-base or subsurface material. (Photographs 1 through 8, and 14).
- The oil stone chips are present beneath the transmission towers. The cap preventing exposure to subsurface soil at these locations appears to be intact; however, the oil stone chips are starting to erode. There are some equipment and debris in these areas. Replacement of oil chips in this area should be considered to prevent further erosion and exposure of soil (Photograph 9).
- The oil stone chips are present beneath the pole rack along the northwestern fence line. There is vegetation in this area. Vegetation removal should be considered to prevent compromising the integrity of this cover material (Photograph 10).
- Consistent with previous inspections, there is erosion of the oil stone chips on the sloped areas adjacent to the southwestern side of the building. Brown soil is exposed in this area where there appears to be further erosion of the concrete platform above the slope (Photograph 11 and 12). Vegetation was present during the 2022 inspection (Photographs 11 and 12). The oil stone chips, asphalt and concrete are still present and preventing exposure to the underlying soil at most locations. However, because the oil chips were placed in the rear of the building to protect the integrity of the asphalt cap, future maintenance and/or replacement of the oil chips in this area should be considered to prevent further erosion.
- The pavement patch for the emergency generator installed in 2017 has been repaired and is in good condition. The settlement along the edges of a subsurface structure and a small depression/crack in the southwest area of the pavement that were identified in prior inspections have since been repaired and depression has been patched with new asphalt (Photograph 13).
- The pavement on Lot 48 west of the fence-line and east of the railroad is in overall good condition. Minor cracks were observed consistent with observations during the 2020 and 2021 inspections (Photograph 14). However, the cracks remain surficial and there is no exposure to the subsurface soil.
- The concrete floor of the garage is in good condition (Photograph 15).

Compliance with SMP

The institutional and engineering controls established in the SMP were complied with during this reporting period. Site-wide inspections and cover system monitoring will continue to be performed annually in accordance with the SMP. The results of the annual site-wide inspections and cover system monitoring conducted from 2019 through present will be provided to the NYSDEC in the next Periodic Review Report (PRR) (see below).

IC/EC Compliance

The cover system remains largely intact. The institutional and engineering controls appear to remain effective in preventing uncontrolled exposure to remaining subsurface impacts beneath the cover system. Some exposure of soil due to the erosion of oil stoned chips on a sloped area adjacent to the building was identified. Repair/replacement of the oil stoned chips should be considered in this area, as further discussed above.

Future Inspections and Periodic Review Report Submittals

The next site-wide inspection and cover system monitoring will be performed during summer 2023.

In accordance with the SMP, a PRR will be submitted to the Department every fifth year; with the next PRR submittal scheduled for August 2023. The PRR will include the results of the 2019 through 2023 annual site-wide inspection and cover system monitoring reports.

If you have any questions, please feel free to contact us at (607) 216-8966.

Sincerely,

GEI CONSULTANTS, INC., P.C.

Wendy Moore, P.E.
Project Manager

Matthew O'Neil, P.E.
Senior Engineer

WM\MO:jam
Attachments:

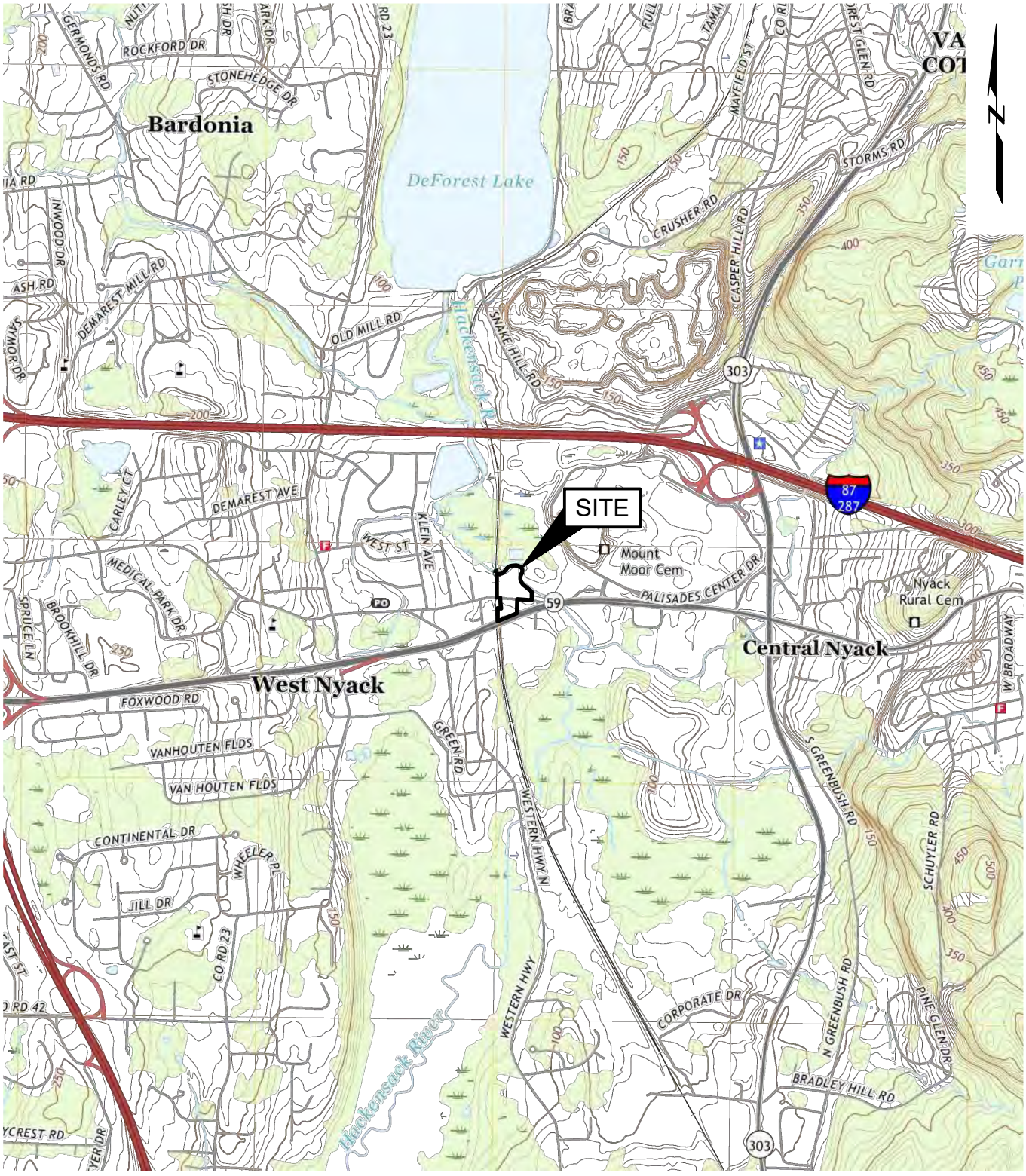
Figures

1. Site Location Map
2. Site Layout Map
3. Remedial Action Excavation Extent

Appendices

A. Annual Site-Wide Inspection and Cover System Monitoring Checklist
B. Photo Documentation

Figures



SOURCE:

NYACK, NY, NJ QUADRANGLE, USGS TOPOGRAPHIC MAP, 7.5-MINUTE SERIES, 2019.

0 2000' 4000'

SCALE: 1" = 2000'

2022 Annual Inspection Report West Nyack Operating Center West Nyack, New York	GEI Consultants	SITE LOCATION MAP
Orange and Rockland Utilities, Inc. Spring Valley, New York	Project 2101712	August 2022 Fig. 1

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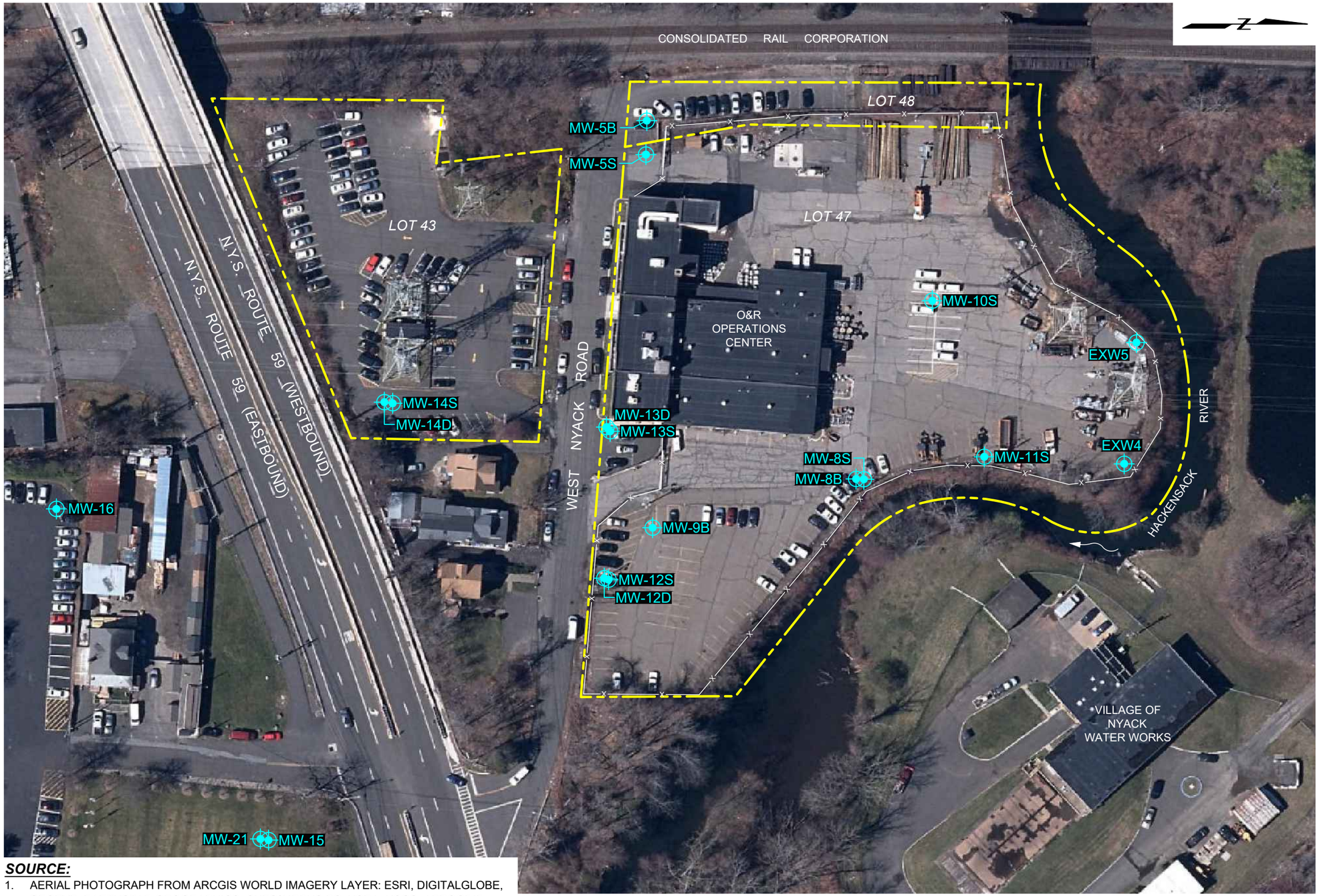

LEGEND:

- MONITORING WELL
- PROPERTY BOUNDARY
- CHAIN-LINK FENCE

SOURCE:

1. AERIAL PHOTOGRAPH FROM ARCGIS WORLD IMAGERY LAYER: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEROGRID, IGN, AND THE GIS USER COMMUNITY, IMAGE DATE 3/12/2016, ACCESSED ON 8/13/2018.
2. *FIGURE 1-2: CURRENT SITE LAYOUT AND MONITORING WELL LOCATIONS,* PREPARED BY AECOM, DATE: 3/25/09, SCALE: 1" = 140'.
3. *TAX MAP,* SHEET 65.05, TOWN OF CLARKSON, ROCKLAND COUNTY, NEW YORK, REVISED THROUGH FEBRUARY 28, 2018, SCAKE: 1" = 100'.

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SCALE: 1" = 80'

2022 Annual Inspection Report
West Nyack Operating Center
West Nyack, New York

Orange and Rockland Utilities, Inc.
Spring Valley, New York

GEI Consultants

SITE LAYOUT MAP

Project 2101712 | August 2022 | Fig. 2

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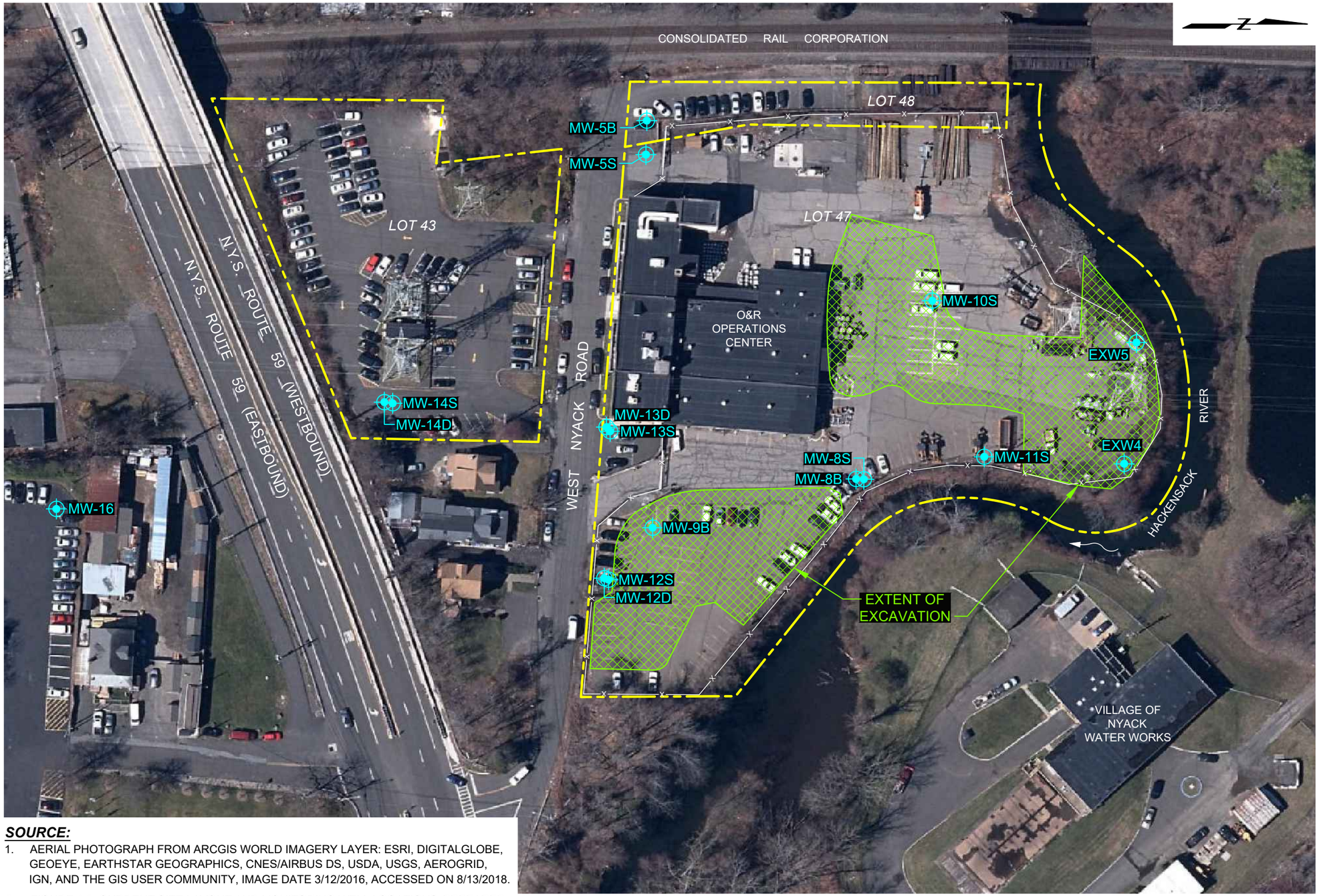

LEGEND:

- MONITORING WELL
- EXTENT OF EXCAVATION
- PROPERTY BOUNDARY
- CHAIN-LINK FENCE

SOURCE:

1. AERIAL PHOTOGRAPH FROM ARCGIS WORLD IMAGERY LAYER: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEROGRID, IGN, AND THE GIS USER COMMUNITY, IMAGE DATE 3/12/2016, ACCESSED ON 8/13/2018.
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3. *TAX MAP,* SHEET 65.05, TOWN OF CLARKSON, ROCKLAND COUNTY, NEW YORK, REVISED THROUGH FEBRUARY 28, 2018, SCAKE: 1" = 100'.
4. EXCAVATION EXTENTS FROM FIGURE 2: SITE LAYOUT, PREPARED BY AECOM, SCALE: 1" = 120', DATE: 2/15/2012.

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SCALE: 1" = 80'

2022 Annual Inspection Report
West Nyack Operating Center
West Nyack, New York

Orange and Rockland Utilities, Inc.
Spring Valley, New York

GEI Consultants

REMEDIAL ACTION
EXCAVATION EXTENT

Project 2101712 | August 2022 | Fig. 3

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Appendix A

Annual Site-Wide Inspection and Cover System Monitoring Checklist

Annual Site-Wide Inspection and Soil Cover System Monitoring Checklist

Site: West Nyack Orange and Rockland (WNOC)
Address: 766 West Nyack Road, West Nyack, NY 10994

Date of Inspection: *8/24/22*

Weather: *79 F Sunny*

Inspector: *Alina R. Salaiz*
Company: GEI Consultants, Inc., 455 Winding Brook Drive, Glastonbury, CT 06033

O&R Representative: *Bobta Kim*

General Site Conditions

Are there any new or removed structures: Yes __ (No) __ Comments:
Does the site have proper up keep: (Yes) __ No __ Comments:
Evidence of unauthorized entry: Yes __ (No) __ Comments:
Damage to entrances/exits: Yes __ (No) __ Comments:
Any illegally dumped materials: Yes __ (No) __ Comments:
Any unusual odors: Yes __ (No) __ Comments:
Are any monitoring wells opened or damaged: Yes __ (No) __ Comments: *MW5B repaired today*

Engineering Control Systems

The site engineering control system is a "soil cap" (composite cover system). Exposure to remaining contamination in soil/fill at the site is prevented by a composite cover system placed over the site. Following remedial actions, the excavated area was backfilled with a combination of clean fill and thermally-treated soils. A composite cover system was then placed over the site. This cover system consists of 12 inches of structural sub-base, 3 inches of binder course, and 1 ½ inches of wearing course placed in the excavated areas, and 3 inches of binder course and 1 ½ inches of wearing course placed over the majority of the remainder of the site. In the driveway areas that were already paved, Petro-Mats® were laid over the existing pavement and covered with approximately 1 ½ inches of wearing course. Additionally, several inches of oiled stone chips were placed beneath the transmission towers in the northernmost portion of the site, as well as in the pole rack and areas immediately adjacent to the rear of the building in order to protect the integrity of the cover system.

Note Integrity of:

Asphalt covered roads: Good (Cracks) Holes Stain/Seepage
Comments: *Shallow, similar to 2021*

Concrete building slabs: (Good) Cracks Holes Stain/Seepage
Comments:

Clean soil cover/cap: Good Cracks (Holes) Stain/Seepage
Comments: *Oil stoned chip erosion on sloped area adjacent to building*

Was maintenance or repair of the capped areas conducted? Yes (No)
Comments:

Security Fencing around the site: (Good) Deficient
Comments:

Institutional Controls (Site Restrictions)

The property may only be used for industrial or commercial use provided that the long-term Engineering and Institutional Controls included in the SMP are employed. (Yes) No

The property may not be used for a higher level of use such as unrestricted or restricted residential use without additional remediation and amendment of the deed restriction, as approved by the NYSDEC. Residential use observed? Yes (No)

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

Was excavation conducted on site? Yes (No)
Was the Excavation Work Plan followed? Yes No (N/A)
Were the CAMP and EHASP followed? Yes No (N/A)
Was there any construction or other disturbances of the cap conducted on site? Yes No
Ask for documentation if yes.

The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use. Any potable/non-potable well usage? Yes (No)

The potential for vapor intrusion must be evaluated for any buildings developed in the area while groundwater impacts are still present and any potential impacts that are identified must be monitored or mitigated. New buildings in past year? Yes (No)

Was Soil Vapor Intrusion Sampling Conducted? Yes (No)

Vegetable gardens and farming on the property are prohibited Observed? Yes (No)

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 of failure to comply with the SMP. Yes (No)
Ask for documentation if yes.

Groundwater Sampling
Was access granted to representatives of the Former Grant Hardware Facility Site for sampling?
__N/A - None Requested

Were monitoring well repairs, replacement or decommissioning required? (Yes) No
Roadbox for MW5B was repaired during 2022 inspection based on observations made in 2021.

Notifications Required Yes (No)

60-day advance notice of any proposed changes in site use that are required under the terms of the Orders on Consent, 6NYCRR Part 375, and/or Environmental Conservation Law. Yes (No)

7-day advance notice of any proposed ground-intrusive activities pursuant to the Excavation Work Plan. Yes (No)

Notice within 48-hours of any damage or defect to the foundations structures that reduced or has the potential to reduce the effectiveness of the Engineering Control and likewise any action to be taken to mitigate the damage or defect. Yes (No)

Verbal notice by noon of the following day of any emergency, such as a fire, flood, or earthquake that reduces or has the potential to reduce the effectiveness of the Engineering Control in place at the site, with written confirmation within 7 days that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public. Yes (No)

Follow-up status reports on actions taken to respond to any emergency event requiring ongoing responsive action shall be submitted to the NYSDEC within 45 days and shall describe and document actions taken to restore the effectiveness of the ECs. Yes (No)

Any change in the ownership of the site or the responsibility for implementing this SMP will include the following notifications:

At least 60 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser has been provided with a copy of the Orders on Consent, and all approved work plans and reports, including this SMP. Yes (No)

Within 15 days after the transfer of all or part of the site, the new owner's name, contact representative, and contact information will be confirmed in writing. Yes (No)
Ask for documentation if yes.

Contingency Plan

In the event of an emergency condition impacting the Engineering Control or building, O&R will follow its existing emergency procedures and evacuation plan for this facility. As appropriate, the fire department and other emergency response group will be notified immediately by telephone of the emergency.

Did an emergency occur in the past year? Yes (No)
Was the fire department or other emergency response group notified immediately?
Yes (No)

Appendix B

Photo Documentation

Appendix B
Photo Documentation – August 2022 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 1
Charging Station and roadway - Frontal View Looking South

PHOTOGRAPH 2
Charging Station and roadway - Looking East

Appendix B
Photo Documentation – August 2022 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 3
Pavement and Fence –Looking Northeast, North of WNOC Building

PHOTOGRAPH 4
Entrance - Looking South, East of WNOC Building

Appendix B
Photo Documentation – August 2022 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 5
Pavement Northwest of Building Looking South Towards Exit

PHOTOGRAPH 6
Pavement Northwest of building looking South at oil chips near exit

Appendix B
Photo Documentation – August 2022 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 7
Pavement – Northwest of Building Looking Southeast

PHOTOGRAPH 8
Pavement West of Building looking South

Appendix B
Photo Documentation – August 2022 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 9
Base of Northwestern Transmission Tower – Oil Stone Chips Present

PHOTOGRAPH 10
Pole Rack Along Northwestern Fence Line

Appendix B
Photo Documentation – August 2022 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 11
Southwest Side of Building-Eastern Corner - Erosion of Oil Stone Chips and Vegetation

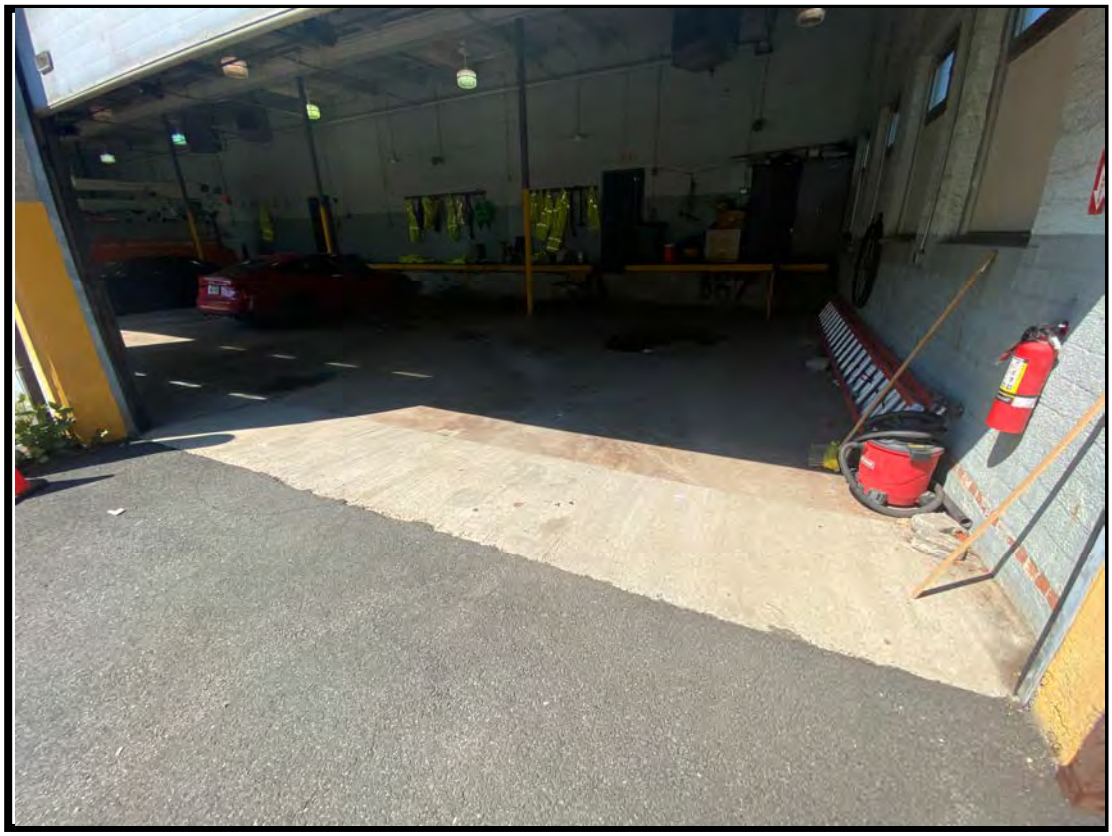
PHOTOGRAPH 12
Southwestern Side of Building – Oil Stone Chips Adjacent to Building with Vegetation

Appendix B
Photo Documentation – August 2022 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 13
Fixed Depression/Crack in Pavement Patch for Emergency Generator

PHOTOGRAPH 14
Pavement on Lot 48 – West of Fence-line, East of RR, looking North

Appendix B
Photo Documentation – August 2022 Site Inspection
O&R West Nyack Operations Center



PHOTOGRAPH 15
Concrete inside building

PHOTOGRAPH 16
MW-5B Repaired Road box

Consulting Engineers and Scientists

September 2, 2021
Project 2101712

Mr. Raphael Rosenbaum
Scientist - EH&S, MGP Remediation
Consolidated Edison Company of New York
31-01 20th Avenue, Building 138, 2nd Floor
Long Island City, NY 11105-2048

Dear Mr. Rosenbaum:

Re: 2021 Annual Inspection Report
West Nyack Operating Center
766 West Nyack Road, West Nyack, New York

GEI Consultants, Inc., P.C. has prepared this Annual Inspection Report on behalf of Consolidated Edison Company of New York (Con Edison) Orange and Rockland Utilities, Inc. (O&R) West Nyack Operating Center (WNOC). This letter documents the results of the annual Site-Wide Inspection and annual Composite Soil Cover System Monitoring that was performed on July 26, 2021, in accordance with the New York State Department of Environmental Conservation (NYSDEC) approved WNOC Site Management Plan (SMP), dated July 2012.

Project Background

The site is located at 766 West Nyack Road, (formerly 180 West Nyack Road) in the Town of Clarkstown, Village of West Nyack, County of Rockland, New York, and is identified as Block 2 and Lots 47 and 48 on the Clarkstown Tax Map. Fig. 1 shows the site location. The site is an approximately 3-acre area bounded by Hackensack River to the north and east, Old Nyack Turnpike (also called West Nyack Road) to the south, and Consolidated Rail Corporation (Conrail) rail tracks to the west (Fig. 2).

O&R also owns Lot 43 south of West Nyack Road. This property is used for employee parking for the O&R facility and was not part of the remedial actions for the site. Lot 43 is not included in the engineering controls described in the Site Management Plan (SMP). South of the site, directly across Route 59, is the Grant Hardware Site (NYSDEC # 344031).

The O&R WNOC facility is currently used as a satellite service center for O&R line crews with garage facilities and a fueling station for utility service trucks, parking space for O&R vehicles, equipment storage, as well as office space. From the 1920s to approximately 1981, transformers, capacitors, and other electrical equipment were stored and repaired at the facility. Two underground storage tanks (USTs) were located in the center of the site and were used to store gasoline for fueling O&R's utility vehicles. One tank was identified as leaking and was removed in 1989. The second tank was removed during the 1997 to 1998 remedial actions.

The site was investigated and remediated in accordance with Order on Consent Index # W3-0508-93-12, Site # 344014, which was executed on August 2, 1994. A Remedial Investigation (Rust,

July 1996), and a Feasibility Study (Rust, July 1997) were performed by Rust Environment & Infrastructure and additional Supplemental Subsurface Investigation (Tetra Tech, 2005) were performed to characterize the nature and extent of contamination at the site. The results of these investigations indicated the subsurface soil in the vicinity of the UST area exhibited elevated petroleum-related volatile organic compound (VOC) concentrations. The depth of petroleum-impacted soil ranged from 1 foot to 14 feet. Limited Polychlorinated Biphenyl (PCB) impacts in subsurface soil were also identified.

The site was remediated in 1998 in accordance with the NYSDEC-approved Remedial Action Work Plan (RAWP) dated September 1997. A Record of Decision (ROD) was issued in October 1997. Remedial activities were initiated by O&R in November 1997, and completed in April 1998 (RUST, 1998). The remedial actions included:

- Excavation of 9,328 cubic yards of soil from areas on the site containing petroleum-related VOCs and PCBs in excess of NYSDEC recommended cleanup levels (0.06 mg/kg benzene and 1.2 mg/kg xylene and 10 mg/kg PCBs). The extent of excavation is shown on Fig. 3.
- Placement of a composite cover system over remaining soil impacts at the site. This cap consists of 12 inches of structural sub-base, 3 inches of binder course, and 1 ½ inches of wearing course placed in the excavated areas, and 3 inches of binder course and 1 ½ inches of wearing course placed over the majority of the remainder of the site. In the driveway areas which were already paved, Petro- Mats® were laid over the existing pavement and covered with approximately 1 ½ inches of wearing course. Additionally, several inches of oiled stone chips were placed beneath the transmission towers in the northernmost portion of the site, as well as in the areas immediately adjacent to the rear of the building in order to protect the integrity of the asphalt cap. Security fencing was replaced around the site as well.
- Development and implementation of a Site Management Plan (SMP) for long term management of remaining contamination. The SMP was finalized in July 2012 (AECOM, 2012).

2021 Site-Wide Inspection

The SMP specifies that site-wide inspections be performed a minimum of once per year and a site-wide inspection form be completed. The form will compile sufficient information to assess the following:

- Compliance with all ICs, including site usage.
- An evaluation of the condition and continued effectiveness of EC.
- General site conditions at the time of the inspection.
- The site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection.
- Confirm that site records are up to date.

The 2021 annual inspection was conducted by GEI on July 26, 2021. A copy of the Annual Site-Wide Inspection and Soil Cover System Monitoring Checklist is included in Appendix A.

There was no evidence of unauthorized entry, damage to entrances or exits, illegal dumping, or unusual odors. There were some housekeeping issues identified but none of the housekeeping

issues impacted the effectiveness of the institutional or engineering controls. The fence surrounding the site was intact, however, significant vegetation was present all along the fence line (Photograph 5, Appendix B).

Four electric car charging stations, a utility pole, an electric panel, and bollards to protect the charging stations were installed in the grass area along the southeastern fence line in November 2020 and completed in April 2021. Three stations, the pole, and the electric panel were installed along the easternmost portion of the southern fence line and one station was installed along the southernmost portion of the eastern fence line, as shown in Photographs 1 through 4 of Appendix B. This work was performed on the grass area between the fence and the pavement, and the pavement was not disturbed during installation. The subsurface work consisted of a 5-foot excavation for installation of the utility pole, 2.5-foot excavations for installation of charging station foundations and trenching approximately 1.5 feet deep for installation of subsurface electric lines. All excavation materials were used as backfill or spread at the location to return the area to original grade. No other restoration was performed. The as-built drawings are provided in Appendix C.

Soil Cover System Monitoring

The SMP specifies that a visual inspection of the complete soil cover system will be conducted on an annual basis concurrently with the site-wide inspection. Components of the soil cover system will be inspected for the following:

- Integrity of asphalt-covered roads
- Integrity of sidewalks
- Integrity of concrete building slabs
- Integrity of "clean soil cover/cap"

The following visual observations on the integrity of the soil cover system were made during the July 2021 site walk. The photographs referenced below are provided in Appendix B.

- Installation of four electric car charging stations was performed in the unpaved area adjacent to the asphalt cap along the southeastern fence line as described above. The asphalt cap was not disturbed during installation of the charging stations, bollards, utility pole or associated electrical components (Photographs 1 through 4).
- The condition of the asphalt cap in the parking and driveway areas throughout the site is improved subsequent to the 2016 re-paving. Some settlement cracks were identified within the asphalt during the 2020 inspection and have since then progressed. However, the cracks are surficial and there is no exposure to the sub-base or subsurface material. The overall integrity of the pavement is good (Photographs 5 through 10).
- The oil stone chips are present beneath the transmission towers. The integrity of the cap preventing exposure to subsurface soil at these locations appears to be intact however the oil stone chips are starting to erode. There is vegetation and some equipment and debris in these areas. Replacement of oil chips in this area should be considered to prevent further erosion and exposure of soil (Photograph 11).
- The oil stone chips are present beneath the pole rack along the northwestern fence line. There is vegetation present. (Photograph 12).

- Consistent with previous inspections, there is erosion of the oil stone chips on the sloped areas adjacent to the southwestern side of the building. Brown soil is exposed in this area where there appears to be further erosion of the concrete platform above the slope (Photograph 12). Vegetation was present during the 2021 inspection although not as overgrown as the 2020 inspection (Photographs 13 and 14). The oil stone chips, asphalt and concrete are still present and preventing exposure to the underlying soil at most locations. Since the oil chips were placed in the rear of the building to protect the integrity of the asphalt cap, future maintenance, and replacement of the oil chips in this area should be performed to prevent further erosion.
- The pavement patch for the emergency generator installed in 2017 has been repaired and is in good condition. Settlement along the edges of a subsurface structure and a small depression/crack in the southwest area of the pavement identified in 2018, 2019 and 2020 has since been fixed and depression has patched with new asphalt (Photograph 15). The subsurface soil is not exposed.
- Cracks that were present in the concrete floor of the garage on the eastern side of the building that was reported in the 2020 inspection have been repaired with new concrete. (Photograph 16).
- Minor cracks were observed within the pavement on Lot 48 west of the fence-line and east of the RR consistent with observations during the 2020 inspection (Photograph 17). There is no exposure to subsurface soil.
- Groundwater monitoring well MW-5B located outside the fence line on the southern portion of Lot 48 has been damaged. The protective casing is damaged and requires replacement. The PVC pipe was slightly cracked but still intact. (Photograph 18).

Compliance with SMP

The institutional and engineering controls established in the SMP were complied with during this reporting period. Annual site-wide inspections and annual cover system monitoring will be performed in accordance with the SMP. The results of the 2019 through 2023 annual site-wide inspections and annual cover system monitoring will be provided to the NYSDEC in the August 2023 Periodic Review Report (PRR).

IC/EC Compliance

The institutional and engineering controls have proved effective in preventing uncontrolled exposure to remaining subsurface impacts beneath the asphalt cap on site. The asphalt cover system was intact. Some exposure of soil due to erosion of oil stoned chips on a sloped area adjacent to the building was identified.

Future Periodic Review Report Submittals

In accordance with the SMP, a PRR will be submitted to the Department every fifth year; the next PRR submittal will be in August 2023. The next site-wide inspection and cover system monitoring will be performed in early July 2022. The PRR will include the results of the 2019 through 2023 annual site-wide inspection and cover system monitoring reports.

If you have any questions, please feel free to contact us at (607) 216-8958.

Sincerely,

GEI CONSULTANTS, INC., P.C.

Kathleen Slimon, P.E., LEP
Project Manager

Matthew O'Neil, P.E.
Senior Engineer

Enclosures:

Figures

1 Site Location Map
2 Site Layout Map
3 Remedial Action Excavation Extent

Appendices

A. Annual Site-Wide Inspection and Soil Cover System Monitoring Checklist
B. Photo Documentation
C. (Draft) Electrical Charging Station As-Built Drawings

KS/JE:lc
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Figures

Appendix A

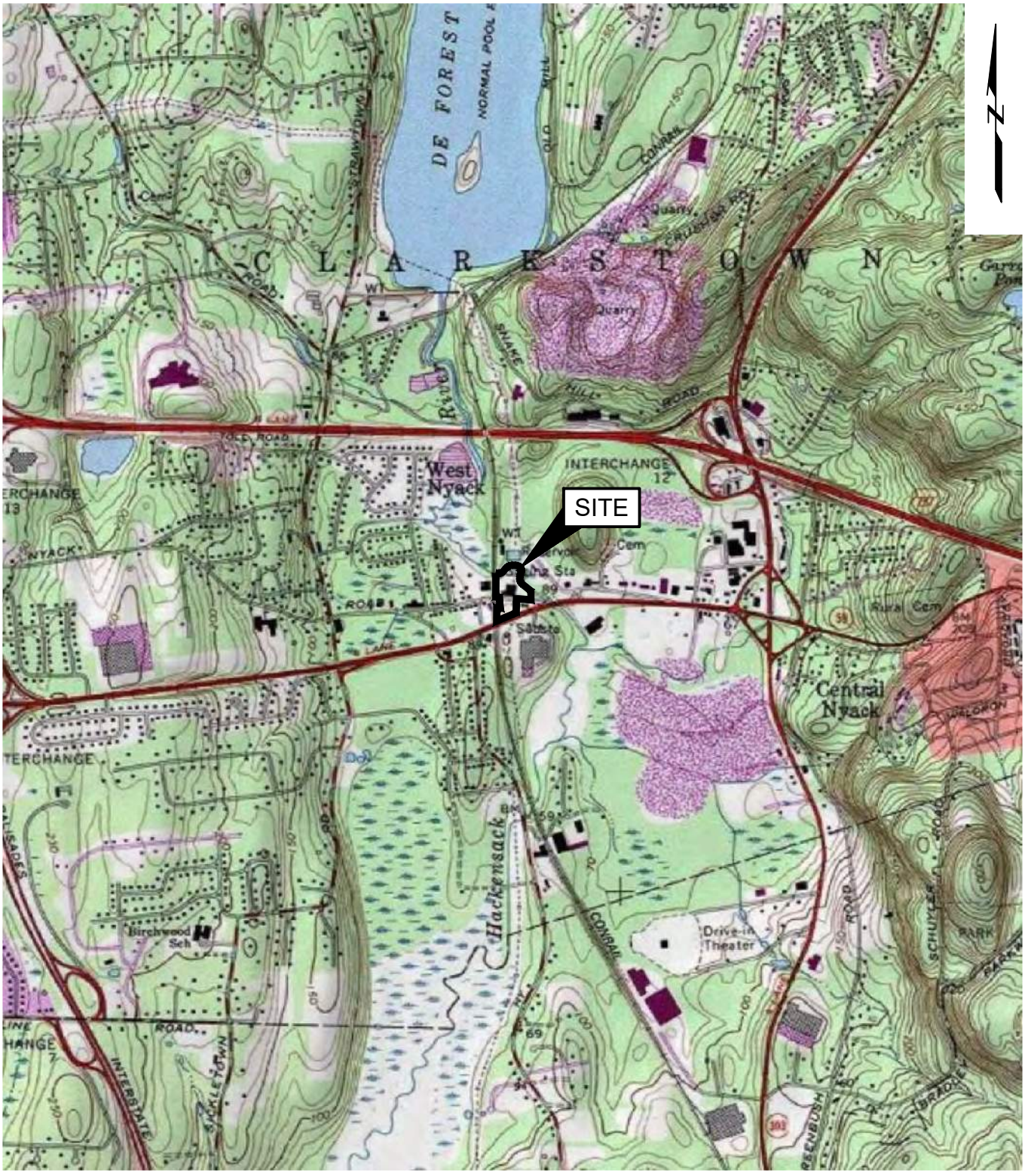
Annual Site-Wide Inspection and Soil Cover System Monitoring Checklist

Appendix B

Photo Documentation

Appendix C

(Draft) Electrical Charging Station As-Built Drawings



SOURCE:
USA TOPO MAPS © 2013 NATIONAL GEOGRAPHIC SOCIETY, I-CUBED, ACCESSED VIA ARCGIS ONLINE.

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SCALE: 1" = 2000'

2021 Annual Inspection Report West Nyack Operating Center West Nyack, New York	GEI Consultants	SITE LOCATION MAP
Orange and Rockland Utilities, Inc. Spring Valley, New York	Project 2101712	August 2021 Fig. 1

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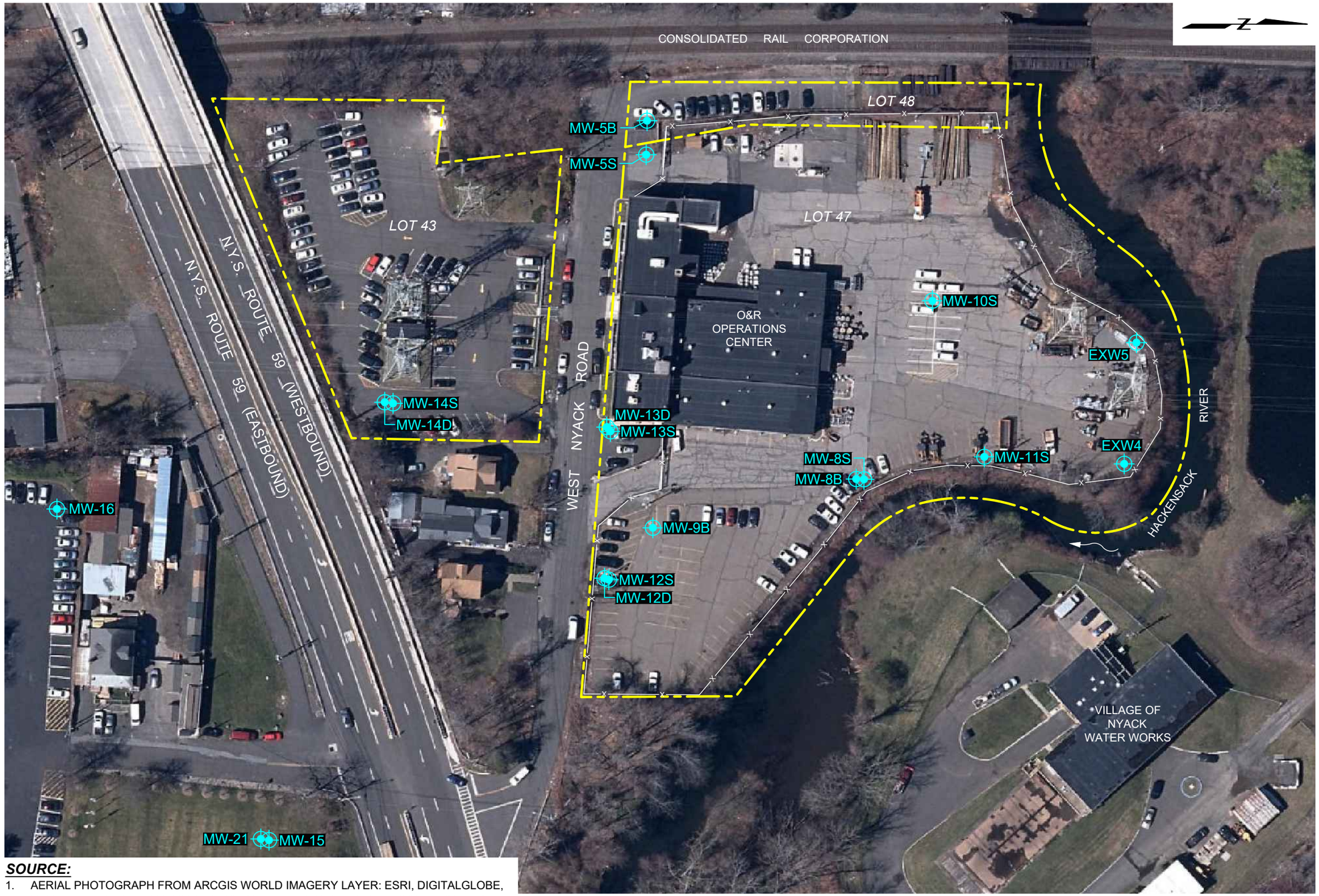

LEGEND:

- MONITORING WELL
- PROPERTY BOUNDARY
- CHAIN-LINK FENCE

SOURCE:

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SCALE: 1" = 80'

2021 Annual Inspection Report
West Nyack Operating Center
West Nyack, New York

Orange and Rockland Utilities, Inc.
Spring Valley, New York

GEI Consultants

SITE LAYOUT MAP

Project 2101712 | August 2021 | Fig. 2

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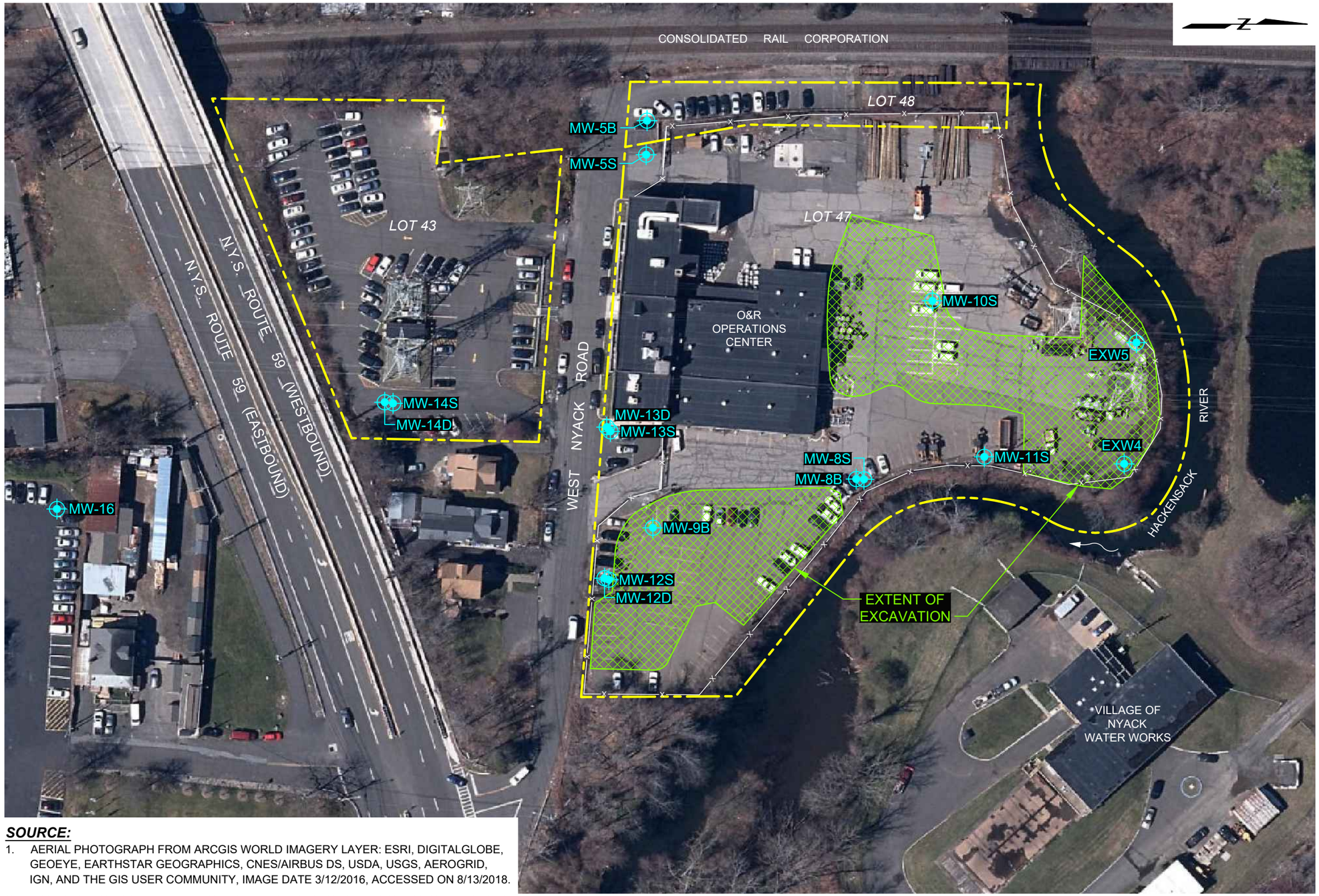

LEGEND:

- MONITORING WELL
- EXTENT OF EXCAVATION
- PROPERTY BOUNDARY
- CHAIN-LINK FENCE

SOURCE:

1. AERIAL PHOTOGRAPH FROM ARCGIS WORLD IMAGERY LAYER: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEROGRID, IGN, AND THE GIS USER COMMUNITY, IMAGE DATE 3/12/2016, ACCESSED ON 8/13/2018.
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3. *TAX MAP,* SHEET 65.05, TOWN OF CLARKSON, ROCKLAND COUNTY, NEW YORK, REVISED THROUGH FEBRUARY 28, 2018, SCAKE: 1" = 100'.
4. EXCAVATION EXTENTS FROM FIGURE 2: SITE LAYOUT, PREPARED BY AECOM, SCALE: 1" = 120', DATE: 2/15/2012.

0 80 160

SCALE: 1" = 80'

2021 Annual Inspection Report
West Nyack Operating Center
West Nyack, New York

Orange and Rockland Utilities, Inc.
Spring Valley, New York

GEI Consultants

REMEDIAL ACTION
EXCAVATION EXTENT

Project 2101712 | August 2021 | Fig. 3

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Annual Site-Wide Inspection and Soil Cover System Monitoring Checklist

Site: West Nyack Orange and Rockland (WNOC)
Address: 766 West Nyack Road, West Nyack, NY 10994

Date of Inspection: 7/26/2021 8:45 am

Weather: Cloudy 72°F

Inspector: Alina Salaiz
Company: GEI Consultants, Inc., 455 Winding Brook Drive, Glastonbury, CT 06033

O&R Representative: Gwen Keeble

General Site Conditions

Are there any new or removed structures: Yes X No __ — Electric Car Charging Station & Utility Pole
Does the site have proper up keep: Yes X No __
Evidence of unauthorized entry: Yes ___ No X
Damage to entrances/exits: Yes ___ No X
Any illegally dumped materials: Yes ___ No X
Any unusual odors: Yes ___ No X
Are any monitoring wells opened or damaged: Yes X No __ — MW-5 lid smashed, crack to PVC pipe

Engineering Control Systems

The site engineering control systems is a soil cap (composite cover system). Exposure to remaining contamination in soil/fill at the site is prevented by a soil cover system placed over the site. Following remedial actions, the excavated area was backfilled with a combination of clean fill and thermally-treated soils. An impermeable asphalt cap was then placed over the entire site. This cap consists of 12 inches of structural sub-base, 3 inches of binder course, and 1 ½ inches of wearing course placed in the excavated areas, and 3 inches of binder course and 1 ½ inches of wearing course placed over the majority of the remainder of the site. In the driveway areas which were already paved, Petro-Mats® were laid over the existing pavement and covered with approximately 1 ½ inches of wearing course. Additionally, several inches of oiled stone chips were placed beneath the transmission towers in the northernmost portion of the site, as well as in the areas immediately adjacent to the rear of the building in order to protect the integrity of the asphalt cap.

Note Integrity of:
Asphalt covered roads: (Good) Cracks Holes Stain/Seepage — Some cracks but not through to ground. Asphalt near generator repaired.
Concrete building slabs: (Good) Cracks Holes Stain/Seepage — Concrete at entrance to garage repaired/replaced
Clean soil cover/cap: Good Cracks (Holes) Stain/Seepage — Oil stoned chip erosion on sloped area adjacent to building
Was maintenance or repair of the capped areas conducted? (Yes) No — Concrete by garage entrance and asphalt by generator repaired as noted above

Integrity of Security Fencing around the site: Fencing in place.

Institutional Controls (Site Restrictions)

The property may only be used for industrial or commercial use provided that the long-term Engineering and Institutional Controls included in the SMP are employed. (Yes) No

The property may not be used for a higher level of use such as unrestricted or restricted residential use without additional remediation and amendment of the deed restriction, as approved by the NYSDEC. Residential use observed? Yes (No)

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

Electric Car Charging Station & Utility Pole

Was excavation conducted on site? (Yes) No

Was the Excavation Work Plan followed? Yes (No)

Excavation performed adjacent to (outside of) asphalt cap area

Were the CAMP and EHASP followed? Yes (No)

Was there any construction or other disturbances of the cap conducted on site? Yes (No)

Ask for documentation if yes.

The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use. Any potable/non-potable well usage? Yes (No)

The potential for vapor intrusion must be evaluated for any buildings developed in the area while groundwater impacts are still present and any potential impacts that are identified must be monitored or mitigated. New buildings in past year? Yes (No)

Was Soil Vapor Intrusion Sampling Conducted? Yes (No)

Vegetable gardens and farming on the property are prohibited Observed? Yes (No)

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 of failure to comply with the SMP. (Yes) No _____

Ask for documentation if yes.

Groundwater Sampling

Was access granted to representatives of the Former Grant Hardware Facility Site for sampling?
None Requested

Were monitoring well repairs, replacement or decommissioning required? Yes (No)

Notifications Required Yes (No)

60-day advance notice of any proposed changes in site use that are required under the terms of the Orders on Consent, 6NYCRR Part 375, and/or Environmental Conservation Law. Yes (No)

7-day advance notice of any proposed ground-intrusive activities pursuant to the Excavation Work Plan. Yes (No)

Notice within 48-hours of any damage or defect to the foundations structures that reduced or has the potential to reduce the effectiveness of the Engineering Control and likewise any action to be taken to mitigate the damage or defect. Yes (No)

Verbal notice by noon of the following day of any emergency, such as a fire, flood, or earthquake that reduces or has the potential to reduce the effectiveness of the Engineering Control in place at the site, with written confirmation within 7 days that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public. Yes (No)

Follow-up status reports on actions taken to respond to any emergency event requiring ongoing responsive action shall be submitted to the NYSDEC within 45 days and shall describe and document actions taken to restore the effectiveness of the ECs. Yes (No)

Any change in the ownership of the site or the responsibility for implementing this SMP will include the following notifications:

At least 60 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser has been provided with a copy of the Orders on Consent, and all approved work plans and reports, including this SMP. Yes (No)

Within 15 days after the transfer of all or part of the site, the new owner's name, contact representative, and contact information will be confirmed in writing. Yes (No)
Ask for documentation if yes.

Contingency Plan

In the event of an emergency condition impacting the Engineering Control or building, O&R will follow its existing emergency procedures and evacuation plan for this facility. As appropriate, the fire department and other emergency response group will be notified immediately by telephone of the emergency.

Did an emergency occur in the past year? Yes (No)
Was the fire department or other emergency response group notified immediately?
Yes (No)

Appendix B
Photo Documentation – July 2021 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 1
Charging Station - Frontal View Looking South

PHOTOGRAPH 2
Charging Station - Looking East

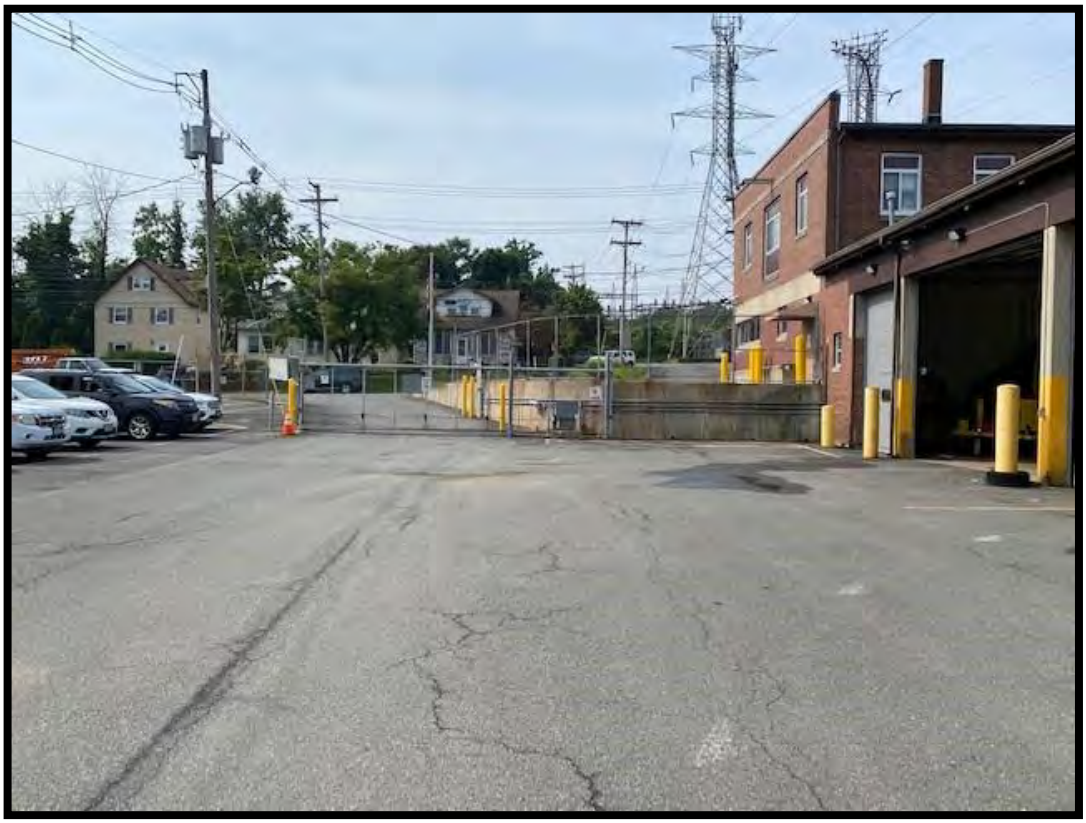
Appendix B
Photo Documentation – July 2021 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 3
Close-Up Charger Looking East

PHOTOGRAPH 4
Charging Station Utility Pole

Appendix B
Photo Documentation – July 2021 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 5
Pavement and Fence –Looking Northeast, North of WNOC Building



PHOTOGRAPH 6
Entrance - Looking South, East of WNOC Building

Appendix B
Photo Documentation – July 2021 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 7
Pavement Northwest of Building Looking South Towards Exit

PHOTOGRAPH 8
Pavement Northwest of building looking North

Appendix B
Photo Documentation – July 2021 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 9
Pavement – Northwest of Building Looking Southeast

PHOTOGRAPH 10
Pavement West of Building looking South

Appendix B
Photo Documentation – July 2021 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 11
Base of Northwestern Transmission Tower – Oil Stone Chips Present

PHOTOGRAPH 12
Pole Rack Along Northwestern Fence Line

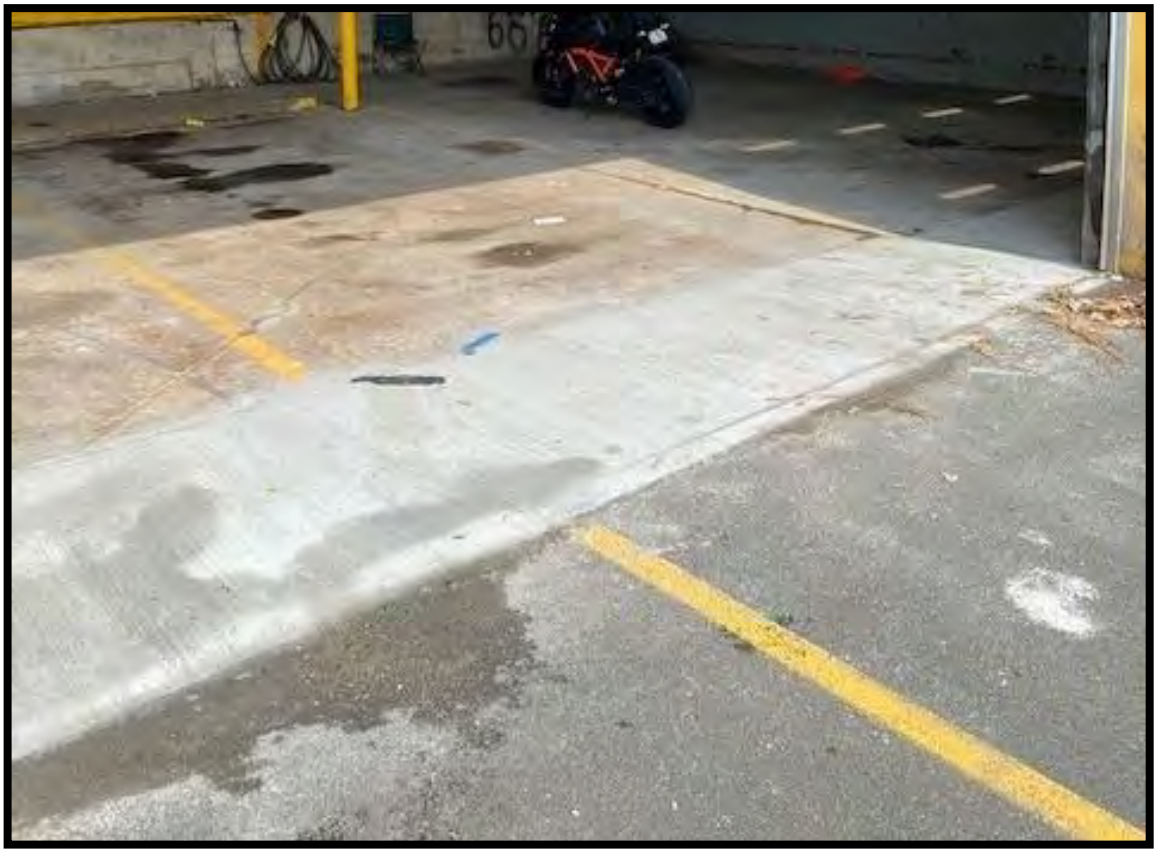
Appendix B
Photo Documentation – July 2021 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 13
Southwest Side of Building-Eastern Corner - Erosion of Oil Stone Chips and Vegetation

PHOTOGRAPH 14
Southwestern Side of Building – Oil Stone Chips Adjacent to Building with Vegetation

Appendix B
Photo Documentation – July 2021 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 15
Fixed Depression/Crack in Pavement Patch for Emergency Generator

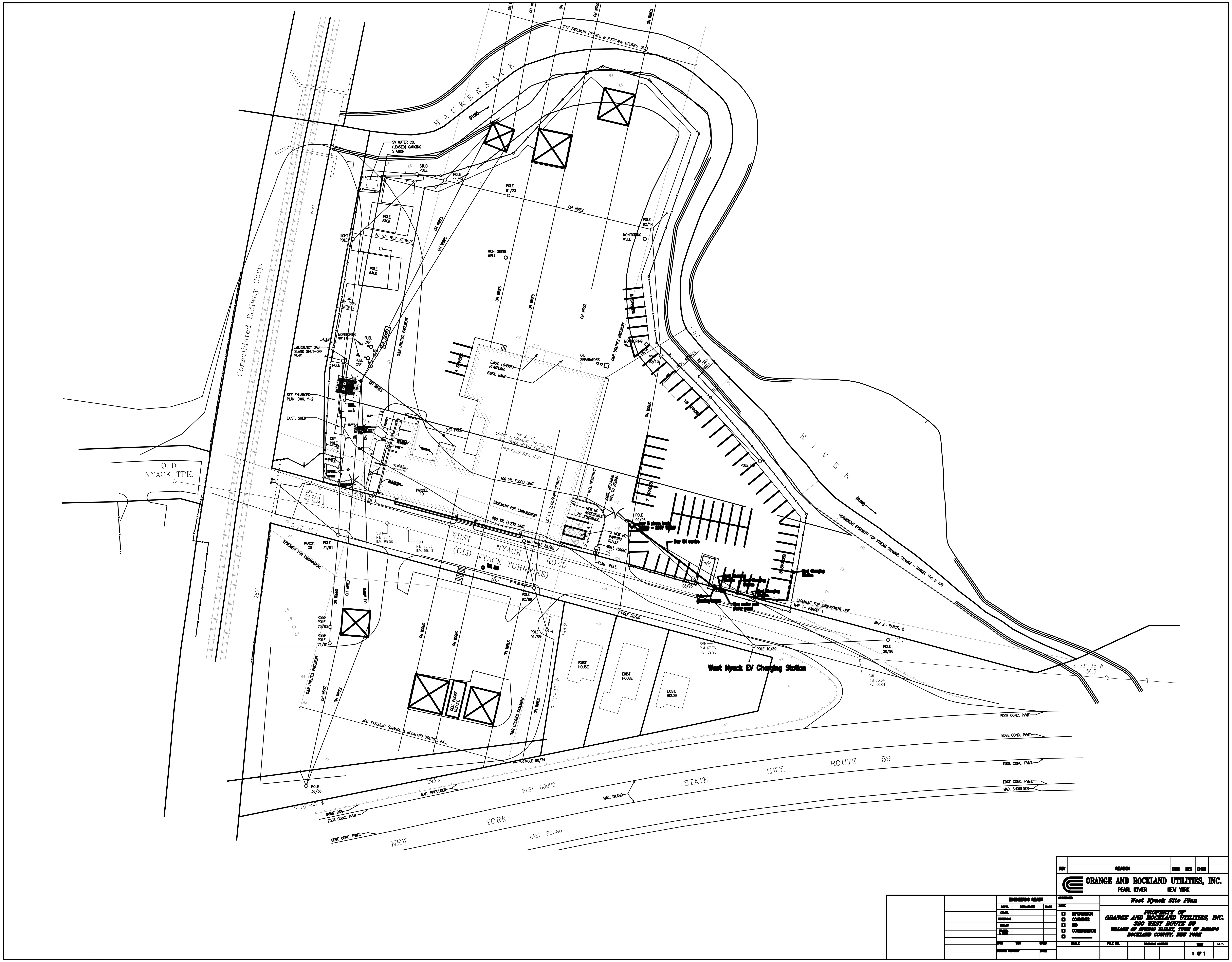


PHOTOGRAPH 16
Cracks in Concrete Floor Fixed of Garage on East Side of Building

Appendix B
Photo Documentation – July 2021 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 17
Pavement on Lot 48 – West of Fence-line, East of RR, looking North

PHOTOGRAPH 18
MW-5B – Smashed Lid



HACKENSACK RIVER
(FLOW)
200' EASEMENT (ORANGE & ROCKLAND UTILITIES, INC.)
SV WATER CO. (LEASED) GAUGING STATION
STUB POLE
POLE 11/14
POLE 81/23
OH WIRES
POLE 92/14
MONITORING WELL
POLE RACK
LIGHT POLE
60' S.Y. BLDG SETBACK
20' S.Y. PARK SETBACK
325'
Consolidated Railway Corp.
MONITORING WELLS
FUEL CAP
MH LID
GAS ISLAND
EMERGENCY GAS ISLAND SHUT-OFF PANEL
POLE
SEE ENLARGED PLAN, DWG. Y-2
EXIST. SHED
GUY POLE
O&R UTILITIES EASEMENT
4 SPACES
EXIST. LOADING PLATFORM.
EXIST. RAMP
OIL SEPARATORS
5 SPACES
MONITORING WELL
POLE 80/13
50' R.Y. BLDG. SETBACK
20' PARK SETBACK
1106'
18 SPACES
DIST POLE
TAX LOT 47
ORANGE & ROCKLAND UTILITIES, INC.
WEST NYACK SERVICE BUILDING
FIRST FLOOR ELEV. 72.77
100 YR. FLOOD LIMIT
PARCEL 19
EASEMENT FOR EMBANKMENT
500 YR. FLOOD LIMIT
80' F.Y. BLDG/PARK SETBACK
WALL HEIGHT=6'
EXIST. RETAINING WALL TO REMAIN
7 SPACES
NEW HC ACCESSIBLE ENTRANCE.
2 NEW HC PARKING STALLS
WALL HEIGHT =2'
FLAG POLE
POLE 99/96
POLE 08/96
6 SPACES
R I V E R
PERMANENT EASEMENT FOR STREAM CHANNEL CHANGE - PARCEL 106 & 105
EASEMENT FOR EMBANKMENT LINE
MAP 1- PARCEL 1
MAP 2- PARCEL 2
OLD NYACK TPK.
SMH RIM 70.44 INV. 58.84
N 72°-51' W
S 72°-15 E
PARCEL 20
POLE 71/91
SMH RIM 70.46 INV. 59.06
SMH RIM 70.53 INV. 59.13
GUY POLE 89/92
WEST NYACK ROAD
(OLD NYACK TURNPIKE)
283'
POLE 92/89
POLE 98/89
POLE 91/85
144.9'
S 11°-32' W
EXIST. HOUSE
EXIST. HOUSE
EXIST. HOUSE
SMH RIM 67.76 INV. 59.96
POLE 10/89
West Nyack EV Charging Station
POLE 20/96
734'
SMH RIM 73.34 INV. 60.04
S 73°-38 W 39.5'
282'
RISER POLE 73/83
RISER POLE 71/81
CELL PHONE MODULE
200' EASEMENT (ORANGE & ROCKLAND UTILITIES, INC.)
POLE 90/74
POLE 36/30
S 79°-50' W
293'±
GUIDE RAIL
EDGE CONC. PVMT.
MAC. SHOULDER
MAC. ISLAND
WEST BOUND
EAST BOUND
NEW YORK STATE HWY. ROUTE 59
REV
REVISION
DWN
DES
CHKD
ORANGE AND ROCKLAND UTILITIES, INC.
PEARL RIVER NEW YORK
ENGINEERING REVIEW
APPROVED
INFORMATION
COMMENTS
BID
CONSTRUCTION
West Nyack Site Plan
PROPERTY OF
ORANGE AND ROCKLAND UTILITIES, INC.
390 WEST ROUTE 59
VILLAGE OF SPRING VALLEY, TOWN OF RAMAPO
ROCKLAND COUNTY, NEW YORK
SCALE
FILE NO.
DRAWING NUMBER
SHEET
REV.
1 OF 1

September 30, 2020
GEI Project 2003559

Consulting
Engineers and
Scientists

Mr. Raphael Rosenbaum
Scientist - EH&S, MGP Remediation
Consolidated Edison Company of New York
31-01 20th Avenue, Building 138, 2nd Floor
Long Island City, NY 11105-2048

Re: 2020 Annual Inspection Report
West Nyack Operating Center
766 West Nyack Road, West Nyack, NY

Dear Mr. Rosenbaum:

GEI Consultants, Inc., P.C. (GEI) has prepared this Annual Inspection Report on behalf of Consolidated Edison Company of New York (Con Edison) Orange and Rockland Utilities, Inc. (O&R) West Nyack Operating Center (WNOC). This letter documents the results of the annual Site-Wide Inspection and annual Composite Soil Cover System Monitoring that was performed on August 21, 2020 in accordance with the New York State Department of Environmental Conservation (NYSDEC) approved WNOC Site Management Plan (SMP), dated July 2012.

Project Background

The site is located at 766 West Nyack Rd., (formerly 180 West Nyack Rd.) in the Town of Clarkstown, Village of West Nyack, County of Rockland, New York, and is identified as Block 2 and Lots 47 and 48 on the Clarkstown Tax Map. Figure 1 shows the site location. The site is an approximately 3-acre area bounded by Hackensack River to the north and east, Old Nyack Turnpike (also called West Nyack Road) to the south, and Consolidated Rail Corporation (Conrail) rail tracks to the west (Figure 2).

O&R also owns Lot 43 south of West Nyack Road. This property is used for employee parking for the O&R facility and was not part of the remedial actions for the site. It is not included in the engineering controls described in the Site Management Plan (SMP). South of the site, directly across Route 59, is the Grant Hardware Site (NYSDEC # 344031).

The O&R WNOC facility is currently used as a satellite service center for O&R line crews with garage facilities and a fueling station for utility service trucks, parking space for O&R vehicles, equipment storage, as well as office space. From the 1920s to approximately 1981, transformers, capacitors, and other electrical equipment were stored and repaired at the facility. Two underground storage tanks (USTs) were located in the center of the site and were used to store gasoline for fueling O&R's utility vehicles. One tank was identified as leaking and was removed in 1989. The second tank was removed during the 1997 to 1998 remedial actions.

The site was investigated and remediated in accordance with Order on Consent Index # W3-0508-93-12, Site # 344014, which was executed on August 2, 1994. A Remedial Investigation (RUST, July 1996), a Feasibility Study (RUST, July 1997), and additional Supplemental Subsurface Investigation (Tetra Tech, 2005) were performed to characterize the nature and extent of

contamination at the site. The results of these investigations indicated the subsurface soil in the vicinity of the UST area exhibited elevated petroleum-related volatile organic compound (VOC) concentrations. The depth of petroleum-impacted soil ranged from 1 foot to 14 feet. Limited Polychlorinated Biphenyl (PCB) impacts in subsurface soil were also identified.

The site was remediated in 1998 in accordance with the NYSDEC-approved Remedial Action Work Plan (RAWP) dated September 1997. A Record of Decision (ROD) was issued in October 1997. Remedial activities were initiated by O&R in November 1997, and completed in April 1998 (RUST, 1998). The remedial actions included:

- Excavation of 9,328 cubic yards of soil from areas on the site containing petroleum-related VOCs and PCBs in excess of NYSDEC recommended cleanup levels (0.06 mg/kg benzene and 1.2 mg/kg xylene and 10 mg/kg PCBs). The extent of excavation is shown on Figure 3.
- Placement of a composite cover system over remaining soil impacts at the site. This cap consists of 12 inches of structural sub-base, 3 inches of binder course, and 1 ½ inches of wearing course placed in the excavated areas, and 3 inches of binder course and 1 ½ inches of wearing course placed over the majority of the remainder of the site. In the driveway areas which were already paved, Petro- Mats® were laid over the existing pavement and covered with approximately 1 ½ inches of wearing course. Additionally, several inches of oiled stone chips were placed beneath the transmission towers in the northernmost portion of the site, as well as in the areas immediately adjacent to the rear of the building in order to protect the integrity of the asphalt cap. Security fencing was replaced around the site as well.
- Development and implementation of a Site Management Plan (SMP) for long term management of remaining contamination. The SMP was finalized in July 2012 (AECOM, 2012).

2020 Site-Wide Inspection

The SMP specifies that site-wide inspections be performed a minimum of once per year and a site-wide inspection form be completed. The form will compile sufficient information to assess the following:

- Compliance with all ICs, including site usage.
- An evaluation of the condition and continued effectiveness of EC.
- General site conditions at the time of the inspection.
- The site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection.
- Confirm that site records are up to date.

The 2020 annual inspection was conducted by GEI on August 21, 2020. A copy of the Annual Site-Wide Inspection and Soil Cover System Monitoring Checklist is included in Appendix A.

There was no evidence of unauthorized entry, damage to entrances or exits, illegal dumping, or unusual odors. The Chief Engineer for the O&R Facilities confirmed there were no excavations, paving or crack repair at the WNOC in the past year. There were some minor housekeeping issues identified but none of the housekeeping issues impacted the effectiveness of the institutional or engineering controls. Miscellaneous equipment is present beneath the transmission towers in the

northern area of the site (Photograph 4 [Appendix B]). Significant vegetation was present on portions of the fence line and on the oiled stone chip surfaces adjacent to the building and beneath the transmission towers and pole racks (Photographs 4, 5 and 6).

Soil Cover System Monitoring

The SMP specifies that a visual inspection of the complete soil cover system will be conducted on an annual basis concurrently with the site-wide inspection. Components of the soil cover system will be inspected for the following:

- Integrity of asphalt-covered roads
- Integrity of sidewalks
- Integrity of concrete building slabs
- Integrity of "clean soil cover/cap"

The following visual observations on the integrity of the soil cover system were made during the August 2020 site walk. The photographs referenced below are provided in Appendix B.

- The condition of the asphalt cap in the parking and driveway areas throughout the site is improved subsequent to the 2016 re-paving. Some settlement cracks were identified within the asphalt that were not identified during the 2019 inspection. However, the cracks are surficial and there is no exposure to the sub-base or subsurface material. The overall integrity of the pavement is good (Photographs 1 through 3).
- The oil stone chips are present beneath the transmission towers. There is significant vegetation and debris in these areas. The integrity of the cap preventing exposure to subsurface soil at these locations appears to be intact (Photograph 4).
- Consistent with previous inspections, there is some erosion of the oil stone chips on the sloped areas adjacent to the southwestern side of the building and cracked pavement was observed along the top of the sloped area adjacent to the building. There is also erosion of a concrete platform above the slope in this area; conditions are consistent with those documented in 2013, 2018 and 2019 however, additional vegetation appeared to be present during the 2020 inspection (Photograph 6). The oil stone chips, asphalt and concrete are still present and preventing exposure to the underlying soil. Since the oil chips were placed in the rear of the building to protect the integrity of the asphalt cap, future maintenance of this area should be considered to prevent further erosion.
- The pavement patch for the emergency generator installed in 2017 is in fair condition with the exception of settlement along the edges of a subsurface structure and a small depression/crack in the southwest area of the pavement identified in 2018 and 2019 (Photograph 8). The subsurface soil is not exposed. The crack/depression appears slightly larger than observed in 2019. Repair of the depression/crack should be considered to prevent future worsening conditions.
- There are cracks present in the concrete floor of the garage on the eastern side of the building (Photograph 9). The cracks are consistent with those documented during previous inspections. There is no exposure to subsurface soil. Repair of the cracks should be considered to prevent worsening conditions.
- Minor cracks were observed within the pavement on Lot 48 west of the fence-line and east of the RR that were not observed during the 2019 inspection (Photograph 10). There is no exposure to subsurface soil.

Compliance with SMP

The institutional and engineering controls established in the SMP were complied with during this reporting period. Annual site-wide inspections and annual cover system monitoring will be performed in accordance with the SMP. The results of the 2019 through 2023 annual site-wide inspections and annual cover system monitoring will be provided to the NYSDEC in the August 2023 Periodic Review Report (PRR).

IC/EC Compliance

The institutional and engineering controls have proved effective in preventing uncontrolled exposure to remaining subsurface impacts on site. The site cover system was intact and no exposure to subsurface soil was identified.

Future Periodic Review Report Submittals

In accordance with the SMP, a PRR will be submitted to the Department every fifth year; the next PRR submittal will be in August 2023. The next site-wide inspection and cover system monitoring will be performed in early July 2021. The PRR will include the results of the 2019 through 2023 annual site-wide inspection and cover system monitoring reports.

If you have any questions, please feel free to contact us at (607) 216-8958.

Sincerely,

GEI CONSULTANTS, INC., P.C.

Kathleen Slimon, P.E., LEP
Project Manager

Matthew O'Neil, P.E.
Senior Engineer

Enclosures:

Figures

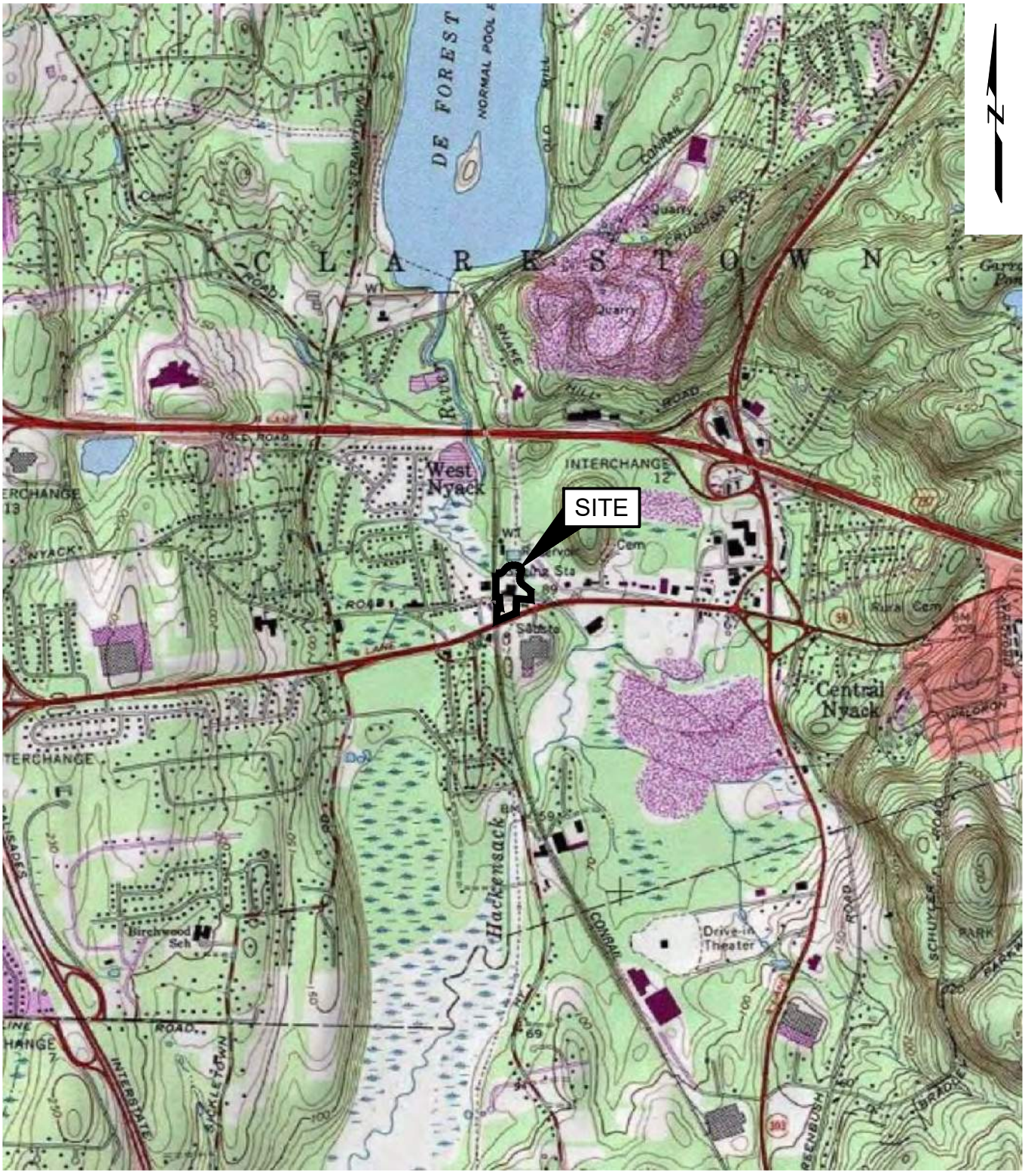
1 Site Location Map
2 Site Layout Map
3 Remedial Action Excavation Extent

Appendices

A Annual Site-Wide Inspection and Soil Cover System Monitoring Checklist
B Photo Documentation

KS/JE/ah B:\Working\O&R\2003559 WNOC 2020 Site Inspection\2020 Eng Inspection\2020 WNOC Inspection Report 9-28-2020.docx

Figures



SOURCE:
USA TOPO MAPS © 2013 NATIONAL GEOGRAPHIC SOCIETY, I-CUBED, ACCESSED VIA ARCGIS ONLINE.

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SCALE: 1" = 2000'

2020 Annual Inspection Report West Nyack Operating Center West Nyack, New York	GEI Consultants	SITE LOCATION MAP
Orange and Rockland Utilities, Inc. Spring Valley, New York	Project 2003559	August 2020 Fig. 1

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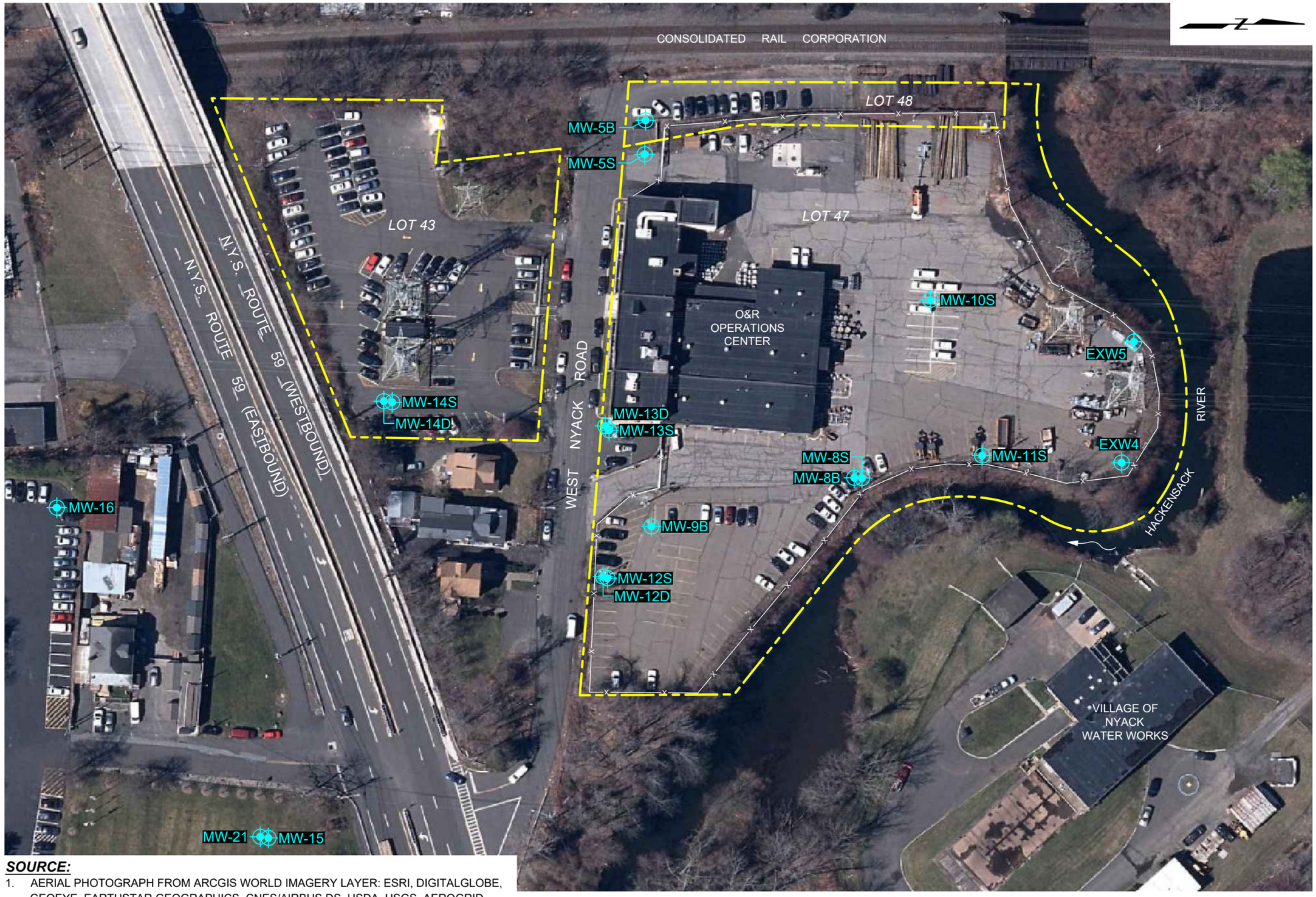

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SCALE: 1" = 80'

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SITE LAYOUT MAP

Project 2003559 | August 2020 | Fig. 2

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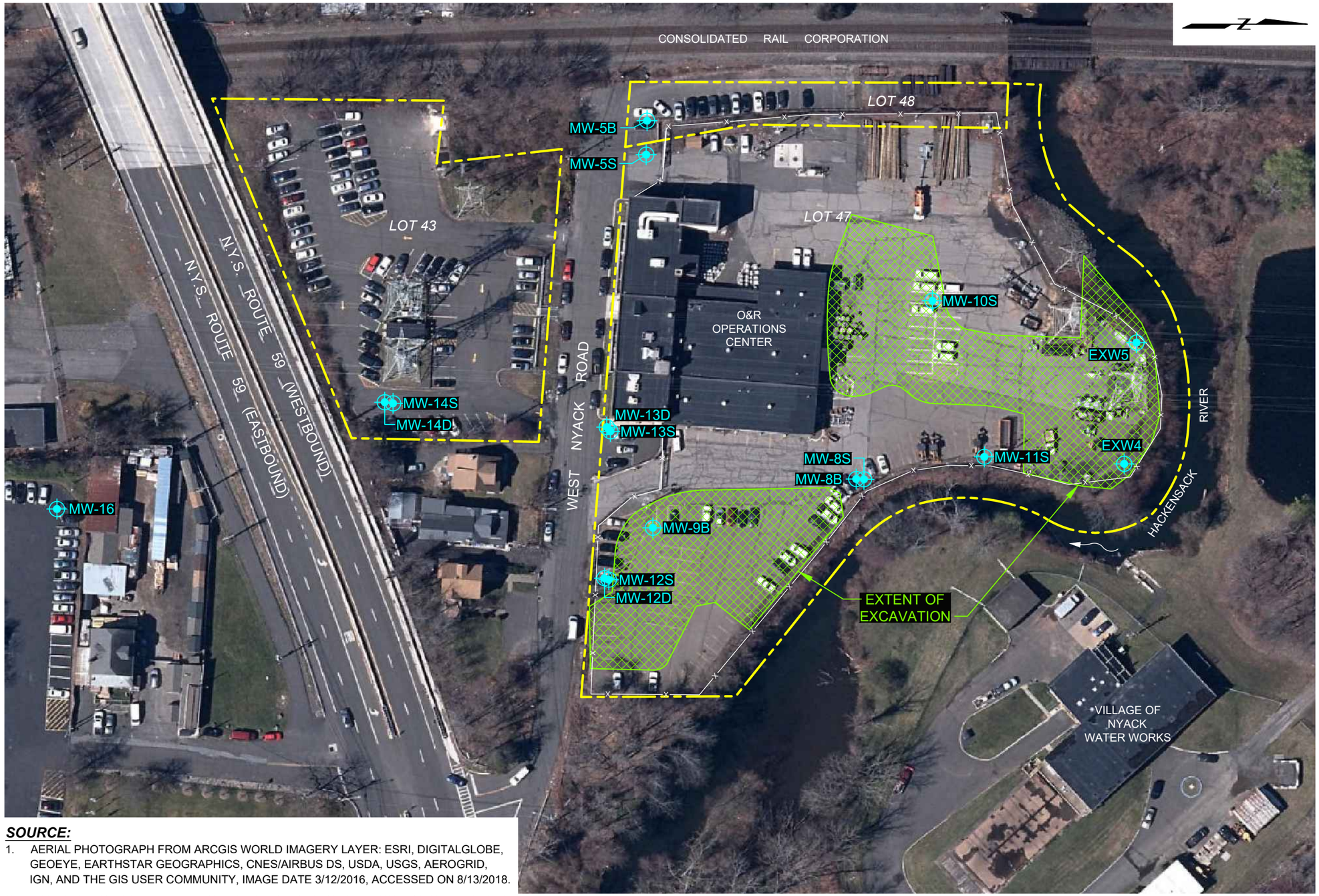

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West Nyack, New York

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Spring Valley, New York

GEI Consultants

REMEDIAL ACTION
EXCAVATION EXTENT

Project 2003559 | August 2020 | Fig. 3

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Appendix A
Annual Site-Wide Inspection and Soil Cover System Monitoring Checklist

Annual Site-Wide Inspection and Soil Cover System Monitoring Checklist

Site: West Nyack Orange and Rockland (WNOC)
Address: 766 West Nyack Road, West Nyack, NY 10994

Date of Inspection: 8/21/2020

Weather: Sunny 70's

Inspector: Kathleen Slimon
Company: GEI Consultants, Inc., 455 Winding Brook Drive, Glastonbury, CT 06033

O&R Representative: Gwen Keeble

General Site Conditions

Are there any new or removed structures: Yes ___ No X__
Does the site have proper up keep: Yes_X__ No __
Evidence of unauthorized entry: Yes ___No X_
Damage to entrances/exits: Yes ___No X_
Any illegally dumped materials: Yes ___No _X
Any unusual odors: Yes ___ No _X
Are any monitoring wells opened or damaged: Yes ___No _X

Engineering Control Systems

The site engineering control systems is a soil cap (composite cover system). Exposure to remaining contamination in soil/fill at the site is prevented by a soil cover system placed over the site. Following remedial actions, the excavated area was backfilled with a combination of clean fill and thermally-treated soils. An impermeable asphalt cap was then placed over the entire site. This cap consists of 12 inches of structural sub-base, 3 inches of binder course, and 1 ½ inches of wearing course placed in the excavated areas, and 3 inches of binder course and 1 ½ inches of wearing course placed over the majority of the remainder of the site. In the driveway areas which were already paved, Petro-Mats® were laid over the existing pavement and covered with approximately 1 ½ inches of wearing course. Additionally, several inches of oiled stone chips were placed beneath the transmission towers in the northernmost portion of the site, as well as in the areas immediately adjacent to the rear of the building in order to protect the integrity of the asphalt cap.

Note Integrity of:

Asphalt covered roads: (Good) (Cracks) Holes Stain/Seepage [Minor Surface Cracks]

Concrete building slabs: (Good) (Cracks) Holes Stain/Seepage [Cracks identified at entryway to garage]

Clean soil cover/cap: (Good) Cracks Holes Stain/Seepage [Vegetation present at oiled stone chip locations.]

Was maintenance or repair of the capped areas conducted? Yes (No) _____

Integrity of Security Fencing around the site: [Integrity of the fence is good. Vegetation growing on fence in some locations.] places.

Institutional Controls (Site Restrictions)

The property may only be used for industrial or commercial use provided that the long-term Engineering and Institutional Controls included in the SMP are employed (Yes) No

The property may not be used for a higher level of use such as unrestricted or restricted residential use without additional remediation and amendment of the deed restriction, as approved by the NYSDEC. Residential use observed? Yes (No)

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

Was excavation conducted on site? Yes (No)
Was the Excavation Work Plan followed? Yes No
Were the CAMP and EHASP followed? Yes No
Was there any construction or other disturbances of the cap conducted on site? Yes (No)
Ask for documentation if yes.

The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use. Any potable/non-potable well usage? Yes (No)

The potential for vapor intrusion must be evaluated for any buildings developed in the area while groundwater impacts are still present and any potential impacts that are identified must be monitored or mitigated. New buildings in past year? Yes (No)

Was Soil Vapor Intrusion Sampling Conducted? Yes (No)

Vegetable gardens and farming on the property are prohibited Observed? Yes (No)

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 of failure to comply with the SMP. Yes (No) _____
Ask for documentation if yes.

Groundwater Sampling
Was access granted to representatives of the Former Grant Hardware Facility Site for sampling? Not Applicable. Groundwater Sampling not Required.

Were monitoring well repairs, replacement or decommissioning required? Yes (No)

Notifications Required **Yes/No**

60-day advance notice of any proposed changes in site use that are required under the terms of the Orders on Consent, 6NYCRR Part 375, and/or Environmental Conservation Law. Yes No

7-day advance notice of any proposed ground-intrusive activities pursuant to the Excavation Work Plan. Yes No

Notice within 48-hours of any damage or defect to the foundations structures that reduced or has the potential to reduce the effectiveness of the Engineering Control and likewise any action to be taken to mitigate the damage or defect. Yes No

Verbal notice by noon of the following day of any emergency, such as a fire, flood, or earthquake that reduces or has the potential to reduce the effectiveness of the Engineering Control in place at the site, with written confirmation within 7 days that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public. Yes No

Follow-up status reports on actions taken to respond to any emergency event requiring ongoing responsive action shall be submitted to the NYSDEC within 45 days and shall describe and document actions taken to restore the effectiveness of the ECs. Yes No

Any change in the ownership of the site or the responsibility for implementing this SMP will include the following notifications:

At least 60 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser has been provided with a copy of the Orders on Consent, and all approved work plans and reports, including this SMP. Yes No

Within 15 days after the transfer of all or part of the site, the new owner's name, contact representative, and contact information will be confirmed in writing. Yes No
Ask for documentation if yes.

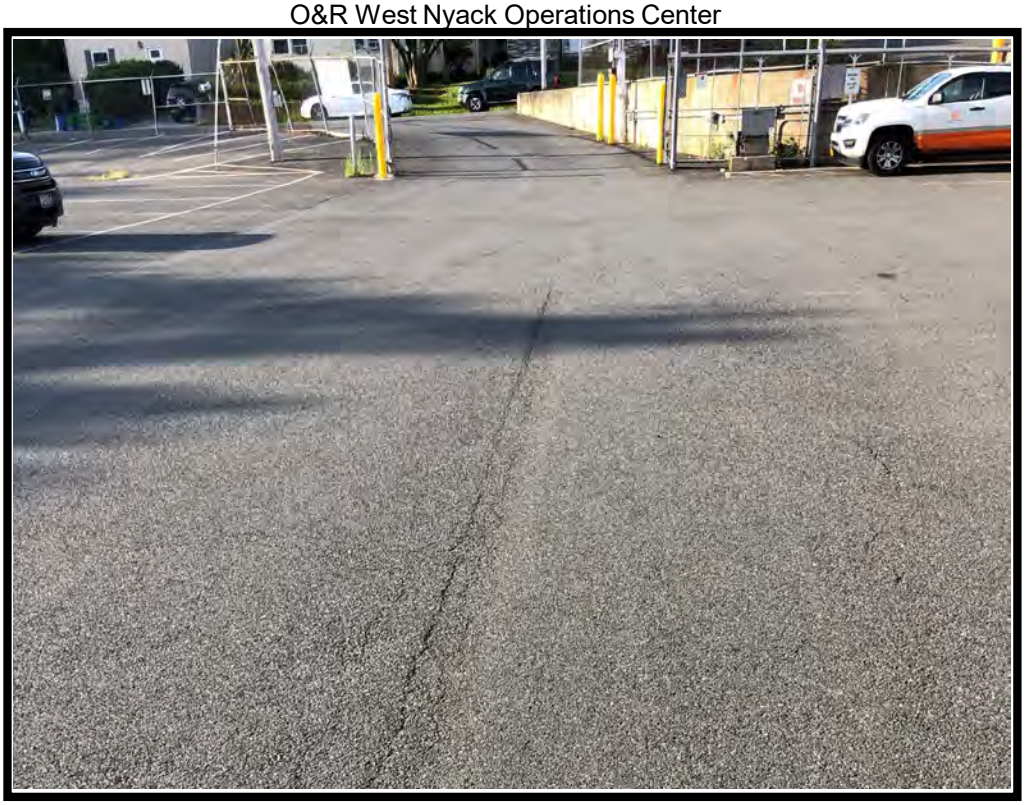
Contingency Plan

In the event of an emergency condition impacting the Engineering Control or building, O&R will follow its existing emergency procedures and evacuation plan for this facility. As appropriate, the fire department and other emergency response group will be notified immediately by telephone of the emergency.

Did an emergency occur in the past year? Yes No
Was the fire department or other emergency response group notified immediately?
Yes No

Appendix B
Photo Documentation

Appendix B
Photo Documentation – August 2020 Site Inspection
O&R West Nyack Operations Center



PHOTOGRAPH 1
Looking South, East of WNOC Building

PHOTOGRAPH 2
Pavement and Fence –Looking Northeast, North of WNOC Building

Appendix B
Photo Documentation – August 2020 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 3
Pavement – Northwest of Building Looking Southeast

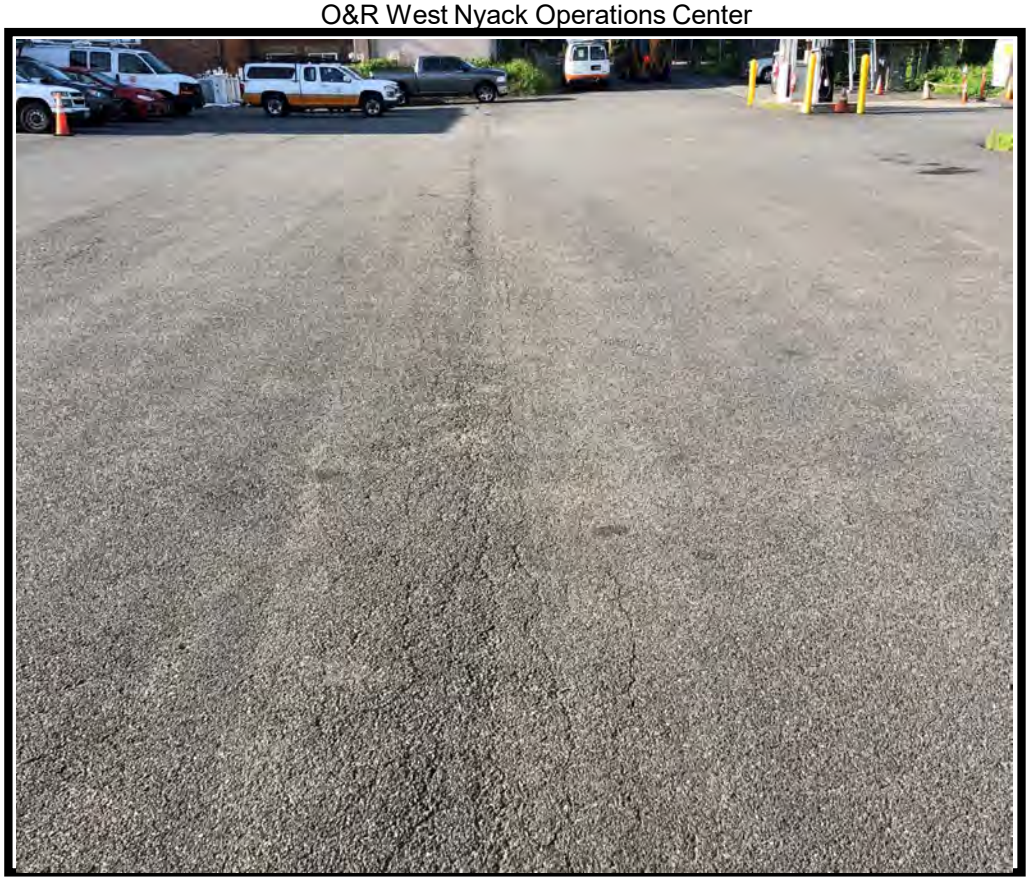
PHOTOGRAPH 4
Base of Northwestern Transmission Tower – Oil Stone Chips Present

Appendix B
Photo Documentation – August 2020 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 5
Pole Rack Along Northwestern Fence Line

PHOTOGRAPH 6
Southwestern Side of Building – Oil Stone Chips Adjacent to Building

Appendix B
Photo Documentation – August 2020 Site Inspection
O&R West Nyack Operations Center



PHOTOGRAPH 7
Pavement Northwest of Building Looking South Towards Fueling Station

PHOTOGRAPH 8
Depression/Crack in Pavement Patch for Emergency Generator

Appendix B
Photo Documentation – August 2020 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 9
Cracks in Concrete Floor of Garage on East Side of Building

PHOTOGRAPH 10
Pavement on Lot 48 – West of Fence-line, East of RR, looking North

September 26, 2019
GEI Project 1902923

Consulting
Engineers and
Scientists

Ms. Maribeth McCormick
Technical Manager - Remediation
Orange and Rockland Utilities, Inc.
390 West Route 59
Spring Valley, NY 10977

Re: 2019 Annual Inspection Report
West Nyack Operating Center
766 West Nyack Road, West Nyack, NY

Dear Ms. McCormick:

GEI Consultants, Inc., P.C. (GEI) has prepared this Annual Inspection Report on behalf of Orange and Rockland Utilities, Inc. (O&R) for the O&R West Nyack Operating Center (WNOC). This letter documents the results of the annual Site-Wide Inspection and annual Composite Soil Cover System Monitoring that was performed on June 26, 2019, in accordance with the New York State Department of Environmental Conservation (NYSDEC) approved WNOC Site Management Plan (SMP), dated July 2012.

Project Background

The site is located at 766 West Nyack Rd., (formerly 180 West Nyack Rd.) in the Town of Clarkstown, Village of West Nyack, County of Rockland, New York, and is identified as Block 2 and Lots 47 and 48 on the Clarkstown Tax Map. Figure 1 shows the site location. The site is an approximately 3-acre area bounded by Hackensack River to the north and east, Old Nyack Turnpike (also called West Nyack Road) to the south, and Consolidated Rail Corporation (Conrail) rail tracks to the west (Figure 2).

O&R also owns Lot 43 south of West Nyack Road. This property is used for employee parking for the O&R facility and was not part of the remedial actions for the site. It is not included in the engineering controls described in the Site Management Plan (SMP). South of the site, directly across Route 59, is the Grant Hardware Site (NYSDEC # 344031).

The O&R WNOC facility is currently used as a satellite service center for O&R line crews with garage facilities and a fueling station for utility service trucks, parking space for O&R vehicles, equipment storage, as well as office space. From the 1920s to approximately 1981, transformers, capacitors, and other electrical equipment were stored and repaired at the facility. Two underground storage tanks (USTs) were located in the center of the site and were used to store gasoline for fueling O&R's utility vehicles. One tank was identified as leaking and was removed in 1989. The second tank was removed during the 1997 to 1998 remedial actions.

The site was investigated and remediated in accordance with Order on Consent Index # W3-0508-93-12, Site # 344014, which was executed on August 2, 1994. A Remedial Investigation (RUST, July 1996), a Feasibility Study (RUST, July 1997), and additional Supplemental Subsurface Investigation (Tetra Tech, 2005) were performed to characterize the nature and extent of

GEI Consultants, Inc., P.C.
1301 Trumansburg Road, Suite N, Ithaca, NY 14850
607.216.8955 fax: 607.274.7577

contamination at the site. The results of these investigations indicated the subsurface soil in the vicinity of the UST area exhibited elevated petroleum-related volatile organic compound (VOC) concentrations. The depth of petroleum-impacted soil ranged from 1 foot to 14 feet. Limited Polychlorinated Biphenyl (PCB) impacts in subsurface soil were also identified.

The site was remediated in 1998 in accordance with the NYSDEC-approved Remedial Action Work Plan (RAWP) dated September 1997. A Record of Decision (ROD) was issued in October 1997. Remedial activities were initiated by O&R in November 1997, and completed in April 1998 (RUST, 1998). The remedial actions included:

- Excavation of 9,328 cubic yards of soil from areas on the site containing petroleum-related VOCs and PCBs in excess of NYSDEC recommended cleanup levels (0.06 mg/kg benzene and 1.2 mg/kg xylene and 10 mg/kg PCBs). The extent of excavation is shown on Figure 3.
- Placement of a composite cover system over remaining soil impacts at the site. This cap consists of 12 inches of structural sub-base, 3 inches of binder course, and 1 ½ inches of wearing course placed in the excavated areas, and 3 inches of binder course and 1 ½ inches of wearing course placed over the majority of the remainder of the site. In the driveway areas which were already paved, Petro- Mats® were laid over the existing pavement and covered with approximately 1 ½ inches of wearing course. Additionally, several inches of oiled stone chips were placed beneath the transmission towers in the northernmost portion of the site, as well as in the areas immediately adjacent to the rear of the building in order to protect the integrity of the asphalt cap. Security fencing was replaced around the site as well.
- Development and implementation of a Site Management Plan (SMP) for long term management of remaining contamination. The SMP was finalized in July 2012 (AECOM, 2012).

2019 Site-Wide Inspection

The SMP specifies that site-wide inspections be performed a minimum of once per year and a site-wide inspection form be completed. The form will compile sufficient information to assess the following:

- Compliance with all ICs, including site usage.
- An evaluation of the condition and continued effectiveness of EC.
- General site conditions at the time of the inspection.
- The site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection.
- Confirm that site records are up to date.

The 2019 annual inspection was conducted by GEI on July 26, 2019. A copy of the Annual Site-Wide Inspection and Soil Cover System Monitoring Checklist is included in Appendix A.

There was no evidence of unauthorized entry, damage to entrances or exits, illegal dumping, or unusual odors. There were some minor housekeeping issues identified but none of the housekeeping issues impacted the effectiveness of the institutional or engineering controls. Miscellaneous equipment and debris are present along the northern and northeastern fence line and beneath the transmission towers in the northern area of the site (Photographs 3 and 4

[Appendix B]). Soil piles were also identified beneath the transmission towers in the northern portion of the site.

Soil Cover System Monitoring

The SMP specifies that a visual inspection of the complete soil cover system will be conducted on an annual basis concurrently with the site-wide inspection. Components of the soil cover system will be inspected for the following:

- Integrity of asphalt-covered roads
- Integrity of sidewalks
- Integrity of concrete building slabs
- Integrity of "clean soil cover/cap"

The following visual observations on the integrity of the soil cover system were made during the July 2019 site walk. The photographs referenced below are provided in Appendix B.

- The condition of the asphalt cap in the parking and driveway areas throughout the site is improved subsequent to the 2016 re-paving. Some settlement cracks were identified within the asphalt that were not identified during the 2018 inspection. However, the cracks are surficial and there is no exposure to the sub-base or subsurface material (Photographs 1 and 2). The overall integrity of the pavement is good (Photograph 3).
- The oil stone chips are present beneath the transmission towers. There is significant vegetation and debris in these areas. The integrity of the cap preventing exposure to subsurface soil at these locations appears to be intact (Photograph 4).
- Consistent with the 2013 and 2018 inspections, there is some erosion of the oil stone chips on the sloped areas adjacent to the southwestern side of the building and cracked pavement was observed along the top of the sloped area adjacent to the building. There is also erosion of a concrete platform above the slope in this area; conditions are consistent with those documented in 2013 and 2018 (Photograph 6). The oil stone chips, asphalt and concrete are still present and preventing exposure to the underlying soil. Since the oil chips were placed in the rear of the building to protect the integrity of the asphalt cap, future maintenance of this area should be considered to prevent further erosion.
- The pavement patch for the new emergency generator installed in 2017 is in fair condition with the exception of a small depression/crack in the southwest area of the pavement identified in 2018 (Photograph 8). The subsurface soil is not exposed. Repair of the depression/crack should be considered to prevent future worsening conditions.
- There are cracks present in the concrete floor of the garage on the eastern side of the building (Photograph 9). The minor cracks are consistent with those documented during the 2018 inspection. There is no exposure to subsurface soil.
- There is no asphalt cover in the area beneath the pole rack storage along the western fence line (Photograph 5). This is consistent with conditions noted during the 2013 and 2018 inspection. The paving plan submitted to and approved by the NYSDEC in 2016 did not include these areas in the areas to be paved.
- Minor cracks were observed along the edge of the pavement on Lot 48 west of the fence-line and east of the RR (Photographs 10 and 11).

Compliance with SMP

The institutional and engineering controls established in the SMP were complied with during this reporting period. Annual site-wide inspections and annual cover system monitoring will be performed in accordance with the SMP. The results of the 2019 through 2023 annual site-wide inspections and annual cover system monitoring will be provided to the NYSDEC in the August 2023 Periodic Review Report (PRR).

IC/EC Compliance

The institutional and engineering controls have proved effective in preventing uncontrolled exposure to remaining subsurface impacts on site. The site cover system was intact and no exposure to subsurface soil was identified.

Future Periodic Review Report Submittals

In accordance with the SMP, a PRR will be submitted to the Department every fifth year; the next PRR submittal will be in August 2023. The next site-wide inspection and cover system monitoring will be performed in early July 2020. The PRR will include the results of the 2019 through 2023 annual site-wide inspection and cover system monitoring reports.

If you have any questions, please feel free to contact us at (607) 216-8958.

Sincerely,

GEI CONSULTANTS, INC., P.C.

Kathleen Slimon, P.E., LEP
Senior Engineer

James Edwards, P.G.
Project Manager

Enclosures:

Figures

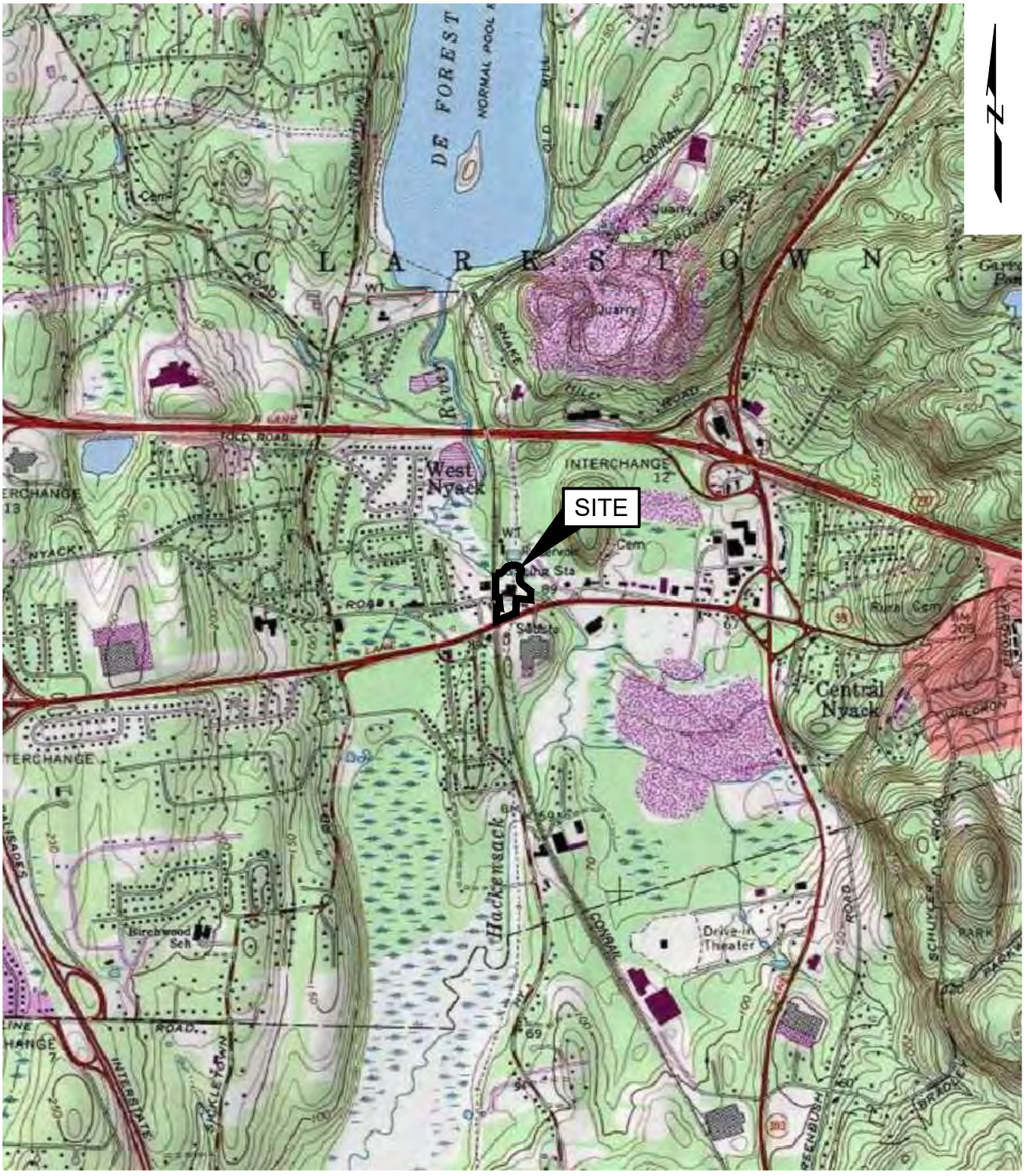
1 Site Location Map
2 Site Layout Map
3 Remedial Action Excavation Extent

Appendices

A Annual Site-Wide Inspection and Soil Cover System Monitoring Checklist
B Photo Documentation

KS/JE/ah B:\Working\O&R\1902923 WNOC 2019 Annual Inspect and EC Eval\2019 Eng Inspection Report\2019 WNOC Inspection Report 8.26.19.docx

Figures



SOURCE:
USA TOPO MAPS © 2013 NATIONAL GEOGRAPHIC SOCIETY, I-CUBED, ACCESSED VIA ARCGIS ONLINE.

0 2000' 4000'
SCALE: 1" = 2000'

2019 Annual Inspection Report West Nyack Operating Center West Nyack, New York	GEI Consultants	SITE LOCATION MAP
Orange and Rockland Utilities, Inc. Spring Valley, New York	Project 1902923	July 2019 Fig. 1

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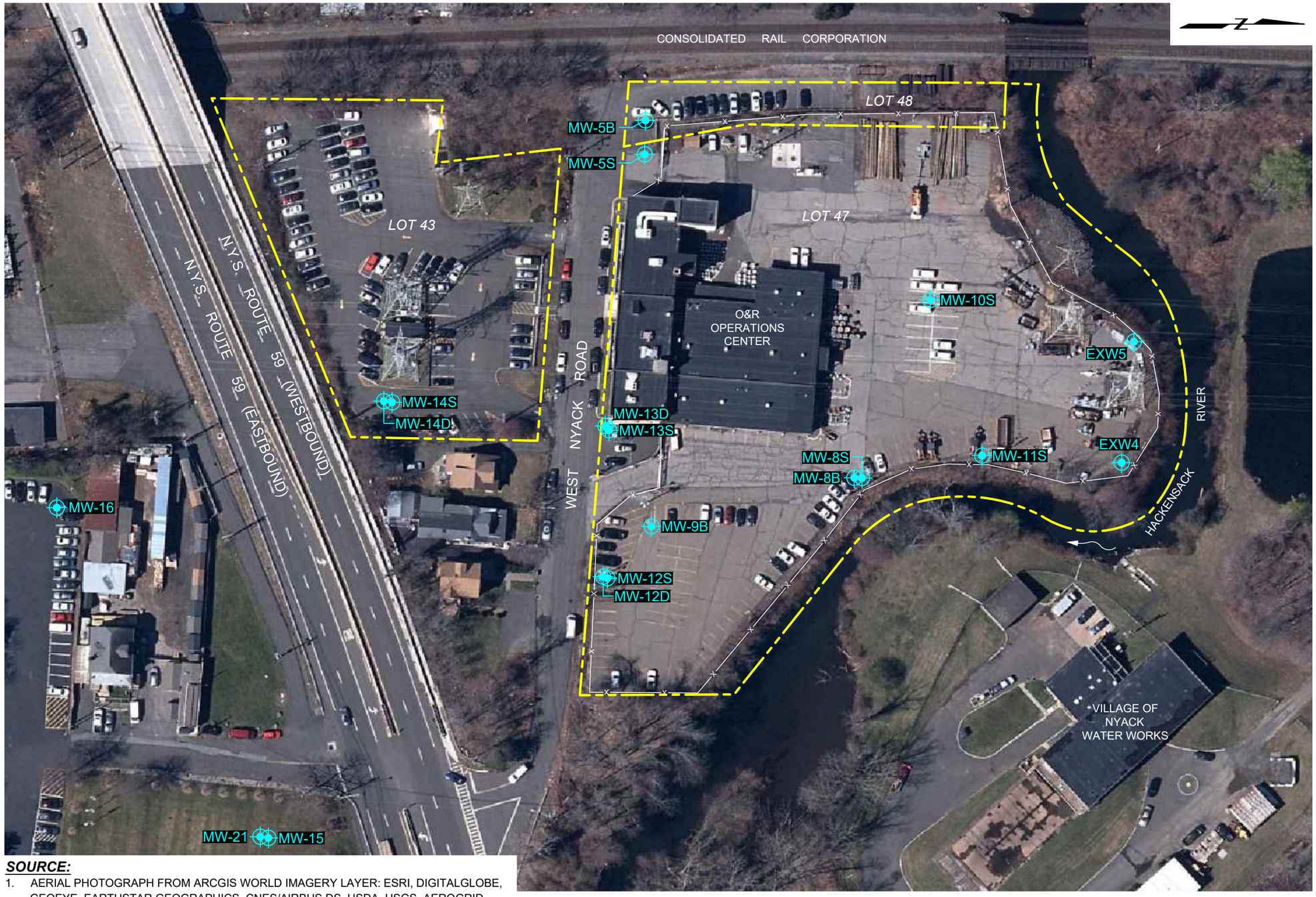

LEGEND:

- MONITORING WELL
- PROPERTY BOUNDARY
- CHAIN-LINK FENCE

SOURCE:

1. AERIAL PHOTOGRAPH FROM ARCGIS WORLD IMAGERY LAYER: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEROGRID, IGN, AND THE GIS USER COMMUNITY, IMAGE DATE 3/12/2016, ACCESSED ON 8/13/2018.
2. *FIGURE 1-2: CURRENT SITE LAYOUT AND MONITORING WELL LOCATIONS,* PREPARED BY AECOM, DATE: 3/25/09, SCALE: 1" = 140'.
3. *TAX MAP,* SHEET 65.05, TOWN OF CLARKSON, ROCKLAND COUNTY, NEW YORK, REVISED THROUGH FEBRUARY 28, 2018, SCAKE: 1" = 100'.

0 80 160

SCALE: 1" = 80'

2019 Annual Inspection Report
West Nyack Operating Center
West Nyack, New York

Orange and Rockland Utilities, Inc.
Spring Valley, New York

GEI Consultants

SITE LAYOUT MAP

Project 1902923 | July 2019 | Fig. 2

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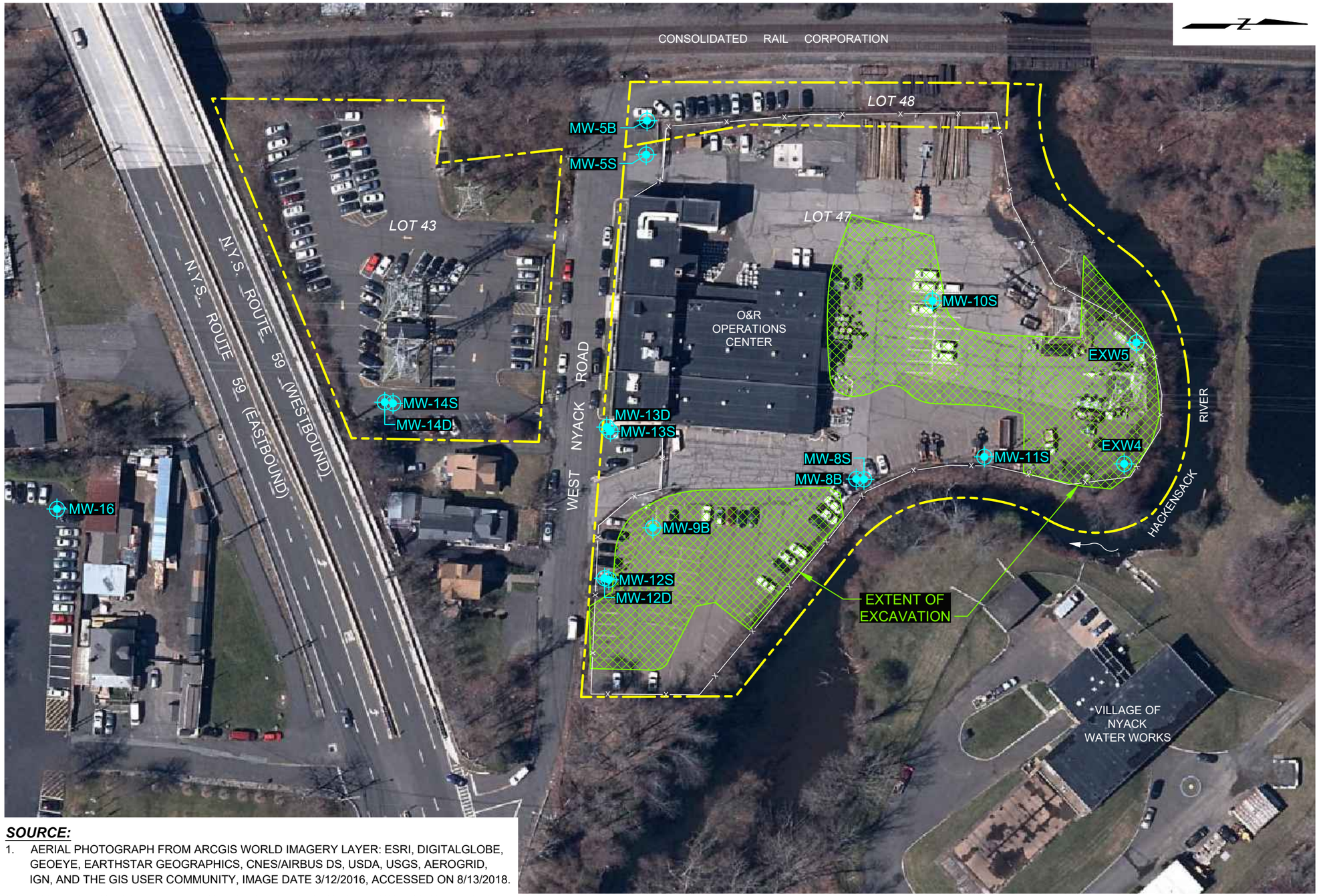

LEGEND:

- MONITORING WELL
- EXTENT OF EXCAVATION
- PROPERTY BOUNDARY
- CHAIN-LINK FENCE

SOURCE:

1. AERIAL PHOTOGRAPH FROM ARCGIS WORLD IMAGERY LAYER: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEROGRID, IGN, AND THE GIS USER COMMUNITY, IMAGE DATE 3/12/2016, ACCESSED ON 8/13/2018.
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3. *TAX MAP,* SHEET 65.05, TOWN OF CLARKSON, ROCKLAND COUNTY, NEW YORK, REVISED THROUGH FEBRUARY 28, 2018, SCAKE: 1" = 100'.
4. EXCAVATION EXTENTS FROM FIGURE 2: SITE LAYOUT, PREPARED BY AECOM, SCALE: 1" = 120', DATE: 2/15/2012.

0 80 160

SCALE: 1" = 80'

2019 Annual Inspection Report
West Nyack Operating Center
West Nyack, New York

Orange and Rockland Utilities, Inc.
Spring Valley, New York

GEI Consultants

REMEDIAL ACTION
EXCAVATION EXTENT

Project 1902923 | July 2019 | Fig. 3

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Appendix A

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Site: West Nyack Orange and Rockland (WNOC)
Address: 766 West Nyack Road, West Nyack, NY 10994

Date of Inspection: June 26, 2019

Weather: Sunny 80 degrees

Inspector: Kathleen Slimon
Company: GEI Consultants, Inc., 455 Winding Brook Drive, Glastonbury, CT 06033

O&R Representative: Maribeth McCormick

General Site Conditions

Are there any new or removed structures: Yes ___ No X
Does the site have proper up keep: Yes X No __
Evidence of unauthorized entry: Yes ___ No X
Damage to entrances/exits: Yes ___ No X
Any illegally dumped materials: Yes ___ No X
Any unusual odors: Yes ___ No X
Are any monitoring wells opened or damaged: Yes ___ No X Some minor surface flooding due to recent heavy rains.

Engineering Control Systems

The site engineering control systems is a soil cap (composite cover system). Exposure to remaining contamination in soil/fill at the site is prevented by a soil cover system placed over the site. Following remedial actions, the excavated area was backfilled with a combination of clean fill and thermally-treated soils. An impermeable asphalt cap was then placed over the entire site. This cap consists of 12 inches of structural sub-base, 3 inches of binder course, and 1 ½ inches of wearing course placed in the excavated areas, and 3 inches of binder course and 1 ½ inches of wearing course placed over the majority of the remainder of the site. In the driveway areas which were already paved, Petro-Mats® were laid over the existing pavement and covered with approximately 1 ½ inches of wearing course. Additionally, several inches of oiled stone chips were placed beneath the transmission towers in the northernmost portion of the site, as well as in the areas immediately adjacent to the rear of the building in order to protect the integrity of the asphalt cap.

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Note Integrity of:
Asphalt covered roads: Good Cracks Holes Stain/Seepage
Some minor settling cracks on surface since last visit

Concrete building slabs: Good Cracks Holes Stain/Seepage
Some minor pre-existing cracks

Clean soil cover/cap: Good Cracks Holes Stain/Seepage

Was maintenance or repair of the capped areas conducted? Yes No

Integrity of Security Fencing around the site: Good, Vegetation cleared since last visit

Institutional Controls (Site Restrictions)

The property may only be used for industrial or commercial use provided that the long-term Engineering and Institutional Controls included in the SMP are employed. Yes No

The property may not be used for a higher level of use such as unrestricted or restricted residential use without additional remediation and amendment of the deed restriction, as approved by the NYSDEC. Residential use observed? Yes No

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

Was excavation conducted on site? Yes No

Was the Excavation Work Plan followed? Yes No

Were the CAMP and EHASP followed? Yes No

Was there any construction or other disturbances of the cap conducted on site? Yes No

Ask for documentation if yes.

The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use. Any potable/non-potable well usage? Yes No

The potential for vapor intrusion must be evaluated for any buildings developed in the area while groundwater impacts are still present and any potential impacts that are identified must be monitored or mitigated. New buildings in past year? Yes No

Was Soil Vapor Intrusion Sampling Conducted? Yes No

Vegetable gardens and farming on the property are prohibited Observed? Yes No

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 of failure to comply with the SMP. Yes No _____

Ask for documentation if yes.

Groundwater Sampling

Was access granted to representatives of the Former Grant Hardware Facility Site for sampling?
Not Requested

Were monitoring well repairs, replacement or decommissioning required? Yes No

Notifications Required Yes/No

60-day advance notice of any proposed changes in site use that are required under the terms of the Orders on Consent, 6NYCRR Part 375, and/or Environmental Conservation Law. Yes No

7-day advance notice of any proposed ground-intrusive activities pursuant to the Excavation Work Plan. Yes No

Notice within 48-hours of any damage or defect to the foundations structures that reduced or has the potential to reduce the effectiveness of the Engineering Control and likewise any action to be taken to mitigate the damage or defect. Yes No

Verbal notice by noon of the following day of any emergency, such as a fire, flood, or earthquake that reduces or has the potential to reduce the effectiveness of the Engineering Control in place at the site, with written confirmation within 7 days that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public. Yes No

Follow-up status reports on actions taken to respond to any emergency event requiring ongoing responsive action shall be submitted to the NYSDEC within 45 days and shall describe and document actions taken to restore the effectiveness of the ECs. Yes No

Any change in the ownership of the site or the responsibility for implementing this SMP will include the following notifications:

At least 60 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser has been provided with a copy of the Orders on Consent, and all approved work plans and reports, including this SMP. Yes No

Within 15 days after the transfer of all or part of the site, the new owner's name, contact representative, and contact information will be confirmed in writing. Yes No
Ask for documentation if yes.

Contingency Plan

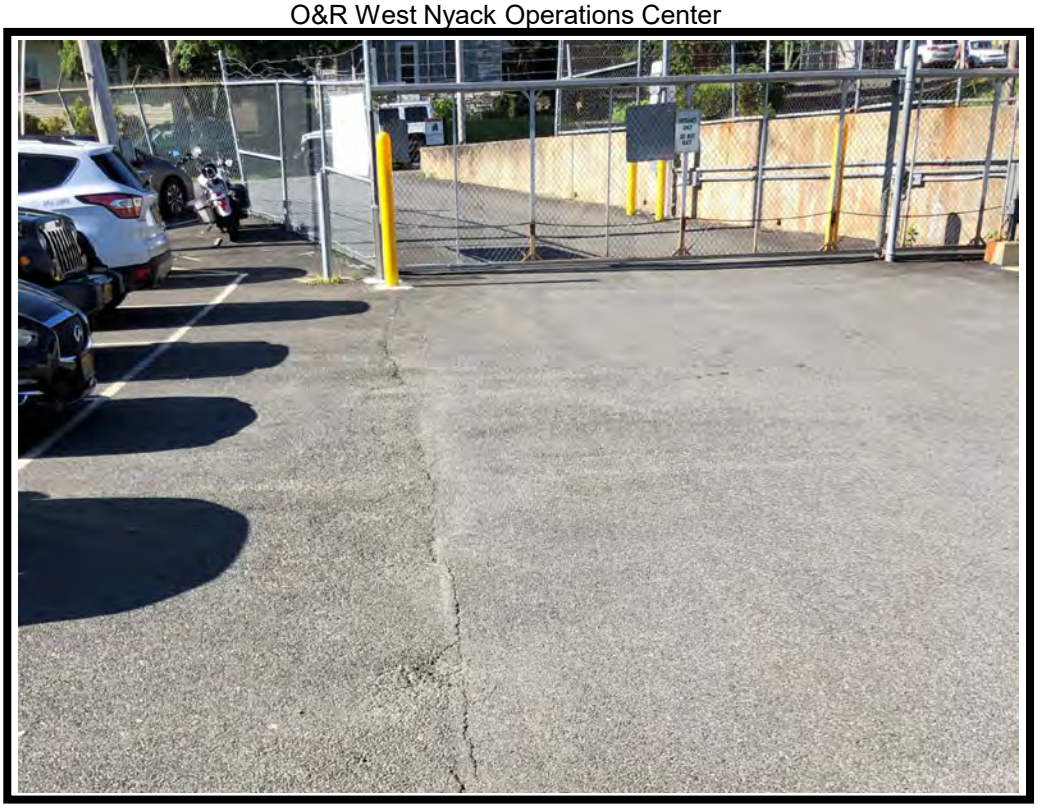
In the event of an emergency condition impacting the Engineering Control or building, O&R will follow its existing emergency procedures and evacuation plan for this facility. As appropriate, the fire department and other emergency response group will be notified immediately by telephone of the emergency.

Did an emergency occur in the past year? Yes No
Was the fire department or other emergency response group notified immediately?
Yes No

Appendix B

Photo Documentation

Appendix B
Photo Documentation – July 2019 Site Inspection
O&R West Nyack Operations Center



PHOTOGRAPH 1
Pavement – Looking South, East of WNOC Building

PHOTOGRAPH 2
Pavement – Looking North, East of WNOC Building

Appendix B
Photo Documentation – July 2019 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 3
Pavement – North of Building Looking East

PHOTOGRAPH 4
Base of Northern Transmission Tower – Oil Stone Chips Present

Appendix B
Photo Documentation – July 2019 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 5
Pole Racks and Fencing along Northern Fence Line

PHOTOGRAPH 6
Western Side of Building (looking South) – Oil Stone Chips Adjacent to Building

Appendix B
Photo Documentation – July 2019 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 7
Truck Fueling Station – Southwest side of Building

PHOTOGRAPH 8
Depression/Crack in Pavement Patch for Emergency Generator

PHOTOGRAPH 9
Cracks in Concrete Floor of Garage on East Side of Building

PHOTOGRAPH 10
Pavement on Lot 48 – West of Fence-line, East of RR, looking South

Appendix B
Photo Documentation – July 2019 Site Inspection
O&R West Nyack Operations Center

PHOTOGRAPH 11
Pavement on Lot 48 – West of Fence-line, East of RR, looking North

Appendix B

Institutional and Engineering Controls Certification 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. 344014

Site Name Orange & Rockland Utilities

Site Address: 766 WEST NYACK ROAD Zip Code: 10994
City/Town: West Nyack
County: Rockland
Site Acreage: 5.180

Reporting Period: July 31, 2018 to July 31, 2023

	YES	NO
1. Is the information above correct?	X	☐
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?	☐	X
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	☐	X
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	☐	X
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?	☐	X

Box 2

	YES	NO
6. Is the current site use consistent with the use(s) listed below? Industrial	X	☐
7. Are all ICs in place and functioning as designed?	X	☐

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

8/25/2023
Date

SITE NO. 344014 **Box 3**

Description of Institutional Controls

Parcel	Owner	Institutional Control
65.05-2-43	Orange & Rocklnad Utilities	Landuse Restriction

* Prohibition against the use of groundwater without treatment.

* Land use must be maintained as industrial

65.05-2-47	Orange & Rockland	Landuse Restriction Monitoring Plan Site Management Plan Ground Water Use Restriction Soil Management Plan

* Prohibition against the use of groundwater without treatment.

* Land use must be maintained as industrial

* Soil Management Plan must be followed

* Cover must maintained

65.5-2-48	Orange & Rockland	Landuse Restriction Ground Water Use Restriction Monitoring Plan Site Management Plan Soil Management Plan

* Prohibition against the use of groundwater without treatment.

* Land use must be maintained as industrial

* Soil Management Plan must be followed

* Cover must maintained

Box 4

Description of Engineering Controls

Parcel	Engineering Control
65.05-2-47	Cover System
65.5-2-48	Cover System

Box 5

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 compete.

YES	NO
X	

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;

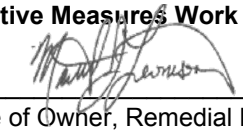
   (d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

   (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
X	

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

8/25/2023

Date

IC CERTIFICATIONS
SITE NO. 344014

Box 6

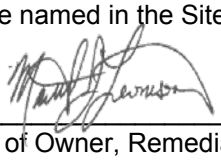
SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

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 Matthew Levinson (print name) at Consolidated Edison of New York, Inc. (print business address),

am certifying as Owner (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

8/25/2023
Date

EC CERTIFICATIONS

Box 7

Professional Engineer Signature

I certify that all information in Boxes 4 and 5 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 Wendy Moore (print name) at GEI Consultants, Inc. (print business address),

am certifying as a Professional Engineer for the Owner (Owner or Remedial Party)

Signature of Professional Engineer, for the Owner or Remedial Party, Rendering Certification	Stamp (Required for PE)	Date
		8/25/2023