

# PROPOSED REMEDIAL ACTION PLAN

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Rosendale Cleaners  
State Superfund Project  
Rosendale, Ulster County  
Site No. 356050  
January 2025



**Department of  
Environmental  
Conservation**

Prepared by  
Division of Environmental Remediation  
New York State Department of Environmental Conservation

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## **SECTION 1: SUMMARY AND PURPOSE OF THE PROPOSED PLAN**

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), is proposing a remedy for the above referenced site. The disposal of hazardous wastes at the site has resulted in threats to public health and the environment that would be addressed by the remedy proposed by this Proposed Remedial Action Plan (PRAP). The disposal of hazardous wastes at this site, as more fully described in Section 6 of this document, has contaminated various environmental media. The proposed remedy is intended to attain the remedial action objectives identified for this site for the protection of public health and the environment. This PRAP identifies the preferred remedy, summarizes the other alternatives considered, and discusses the reasons for the preferred remedy.

The New York State Inactive Hazardous Waste Disposal Site Remedial Program (also known as the State Superfund Program) is an enforcement program, the mission of which is to identify and characterize suspected inactive hazardous waste disposal sites and to investigate and remediate those sites found to pose a significant threat to public health and environment.

The Department has issued this document in accordance with the requirements of New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York; (6 NYCRR) Part 375. This document is a summary of the information that can be found in the site-related reports and documents in the document repository identified below.

## **SECTION 2: CITIZEN PARTICIPATION**

The Department seeks input from the community on all PRAPs. This is an opportunity for public participation in the remedy selection process. The public is encouraged to review the reports and documents, which are available at the following repository:

Rosendale Library  
264 Main Street  
Rosendale, NY 12472  
Phone: (845) 256-3154

**A public comment period has been set from: January 22, 2025  
to February 21, 2025**

**A public meeting is scheduled for the following date:**

**Monday, February 3<sup>rd</sup>, 2025, at 7:00 PM**

**Public meeting location:**

**Rosendale Community Center  
1055, Route 32, Rosendale, NY**

At the meeting, the findings of the remedial investigation (RI) and the feasibility study (FS) will be presented along with a summary of the proposed remedy. After the presentation, a question-and-answer period will be held, during which verbal or written comments may be submitted on the PRAP.

Written comments may also be sent through to:

John Miller  
NYS Department of Environmental Conservation  
Division of Environmental Remediation  
625 Broadway  
Albany, NY 12233  
john.miller@dec.ny.gov

The Department may modify the proposed remedy or select another of the alternatives presented in this PRAP based on new information or public comments. Therefore, the public is encouraged to review and comment on the proposed remedy identified herein. Comments will be summarized and addressed in the responsiveness summary section of the Record of Decision (ROD). The ROD is the Department's final selection of the remedy for this site.

### **Receive Site Citizen Participation Information By Email**

Please note that the Department's Division of Environmental Remediation (DER) is "going paperless" relative to citizen participation information. The ultimate goal is to distribute citizen participation information about contaminated sites electronically by way of county email listservs. Information will be distributed for all sites that are being investigated and cleaned up in a particular county under the State Superfund Program, Environmental Restoration Program, Brownfield Cleanup Program, Voluntary Cleanup Program, and Resource Conservation and Recovery Act Program. We encourage the public to sign up for one or more county listservs at:

<http://www.dec.ny.gov/chemical/61092.html>

### **SECTION 3: SITE DESCRIPTION AND HISTORY**

Location: The site is located at 1090-1094 Route 32 near the intersection of Route 32 and Madeline Lane in Rosendale, Ulster County.

Site Features: The site is an approximately 1.9-acre tax parcel (SBL: 62.83-2-43) that is bisected by a road (Joleyn Lane). The northern and eastern portions of the site are vegetated. The central portion of the site is mostly paved and includes a one-story unoccupied structure. The former dry cleaner building foundation slab remains at the site and a wooden shed exists on the eastern portion of the site. The site is bordered by Route 32 to the west, a wooded area to the east and commercial properties to the north and south. A drainage swale/unnamed creek also exists along the southern/southeastern boundary of the site.

Current Zoning and Land Use: The site parcel is zoned for commercial purposes. Nearby properties consist of properties used for commercial and residential purposes. There is only one on-site building and it is vacant, and parts of the property are used for storage.

Past Use of the Site: The site has been used for a variety of commercial purposes since at least the mid-1900s. A dry cleaner reportedly operated on the site until the business burned down in 1981. A hardware store and a diner also operated on-site until approximately 2009.

Site Geology and Hydrogeology: Fill material is present near the southern source area at varying depths (0'-6' feet below grade) and consists of miscellaneous debris (fabric, glass, plastic, asphalt). Native site soil includes fine sands and silt with intermittent clay at varying depths. Groundwater flow is generally to the north-northwest towards the Rondout Creek. The depth to groundwater varies at the site and is present from approximately 5 to 15 feet below grade.

A site location map is attached as Figure 1. A site boundary map is attached as Figure 2.

### **SECTION 4: LAND USE AND PHYSICAL SETTING**

The Department may consider the current, intended, and reasonably anticipated future land use of the site and its surroundings when evaluating a remedy for soil remediation. For this site, alternatives that restrict the use of the site to commercial (which allows for industrial use) as described in Part 375-1.8(g) is being evaluated in addition to an alternative which would allow for unrestricted use of the site.

A comparison of the results of the investigation to the appropriate standards, criteria and guidance values (SCGs) for the identified land use and the unrestricted use SCGs for the site contaminants is included in the Tables for the media being evaluated in Exhibit A.



## **SECTION 5: ENFORCEMENT STATUS**

Potentially Responsible Parties (PRPs) are those who may be legally liable for contamination at a site. This may include past or present owners and operators, waste generators, and haulers.

The PRPs for the site declined to implement a remedial program when requested by the Department. After the remedy is selected, the PRPs will again be contacted to assume responsibility for the remedial program. If an agreement cannot be reached with the PRPs, the Department will evaluate the site for further action under the State Superfund. The PRPs are subject to legal actions by the state for recovery of all response costs the state has incurred.

The PRPs for the site, documented to date, include:

Aero Star Realty, LLC

Charles Hintze

Esposito Construction Corporation

Chuggs Associates, LP

David C. Gold

Betty J. Gold - Berelson

Stephen Katos

Michael Katos

Rosendale Laundromat

Harold R. Eklund

## **SECTION 6: SITE CONTAMINATION**

### **6.1: Summary of the Remedial Investigation**

A Remedial Investigation (RI) has been conducted. The purpose of the RI was to define the nature and extent of any contamination resulting from previous activities at the site. The field activities and findings of the investigation are described in the RI Report.

The following general activities are conducted during an RI:

- Research of historical information,
- Geophysical survey to determine the lateral extent of wastes,
- Test pits, soil borings, and monitoring well installations,
- Sampling of waste, surface and subsurface soils, groundwater, and soil vapor,
- Sampling of surface water and sediment,
- Ecological and Human Health Exposure Assessments.

The analytical data collected on this site includes data for:

- groundwater
- soil
- sediment
- indoor air
- sub-slab vapor

#### **6.1.1: Standards, Criteria, and Guidance (SCGs)**

The remedy must conform to promulgated standards and criteria that are directly applicable or that are relevant and appropriate. The selection of a remedy must also take into consideration guidance, as appropriate. Standards, Criteria and Guidance are hereafter called SCGs.

To determine whether the contaminants identified in various media are present at levels of concern, the data from the RI were compared to media-specific SCGs. The Department has developed SCGs for groundwater, surface water, sediments, and soil. The NYSDOH has developed SCGs for drinking water and soil vapor intrusion. The tables found in Exhibit A list the applicable SCGs in the footnotes. For a full listing of all SCGs see: <http://www.dec.ny.gov/regulations/61794.html>

#### **6.1.2: RI Results**

The data have identified contaminants of concern (COCs). A "contaminant of concern" is a hazardous waste that is sufficiently present in frequency and concentration in the environment to require evaluation for remedial action. Not all contaminants identified on the property are contaminants of concern. The nature and extent of contamination and environmental media requiring action are summarized in Exhibit A. Additionally, the RI Report contains a full discussion of the data. The contaminant(s) of concern identified at this site is/are:

tetrachloroethene (PCE)  
trichloroethene (TCE)

vinyl chloride  
cis-1,2-dichloroethene (1,2- DCE)

As illustrated in Exhibit A, the contaminant(s) of concern exceed the applicable SCGs for:

- groundwater
- soil

## **6.2: Interim Remedial Measures**

An interim remedial measure (IRM) is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before issuance of the Record of Decision.

There were no IRMs performed at this site during the RI.

## **6.3: Summary of Environmental Assessment**

This section summarizes the assessment of existing and potential future environmental impacts presented by the site. Environmental impacts may include existing and potential future exposure pathways to fish and wildlife receptors, wetlands, groundwater resources, and surface water.

The Fish and Wildlife Resources Impact Analysis (FWRIA), which is included in the RI report, presents a detailed discussion of the existing and potential impacts from the site to fish and wildlife receptors.

**Nature and Extent of Contamination:** Soil and groundwater samples were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, polychlorinated biphenyls (PCBs), and pesticides. Groundwater was also analyzed for per- and polyfluoroalkyl substances (PFAS). Soil vapor intrusion (SVI) sampling for VOCs was also performed in off-site structures; the remaining on-site structure was vacant, and no SVI sampling was performed. Sediment samples were analyzed for VOCs. Based upon the results, the primary contaminants of concern (COCs) at the site include VOCs, specifically tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2 dichloroethene (1,2-DCE) and vinyl chloride. Groundwater data is shown on Figures 3 and 4. Soil data is shown on Figure 5. Sediment and soil vapor sampling locations are shown on Figure 6.

**Soil:** An area of PCE impacted soil was identified adjacent to the former dry cleaner foundation in the southern portion of the site. PCE contamination was observed in this area at depths ranging from approximately 5-15 feet deep. PCE was detected with a maximum concentration of 90,000 parts per million (ppm) in a soil sample (ROS-SB-302) collected at a depth of approximately 6-6.5 feet deep. The PCE concentrations for the remaining impacted soil borings ranged from 2.7 ppm to 1,200 ppm. The soil cleanup objectives (SCOs) for PCE for the protection of groundwater is 1.3 ppm and for commercial use is 150 ppm. Contaminant concentrations decreased significantly with depth down to the groundwater table that is present at approximately 13-14 feet deep in

this area. Additional VOCs were also detected in soil including TCE, 1,2 DCE, vinyl chloride (all breakdown products of PCE) and perfluorooctanesulfonic acid (PFOS) at maximum concentrations of 19, 28, 1.6 and 0.0076 ppm, respectively. These detections exceed their respective SCOs or guidance values of 0.47, 0.25, 0.02 and 0.001 ppm. Limited detections of metals and pesticides were also observed in soil above their unrestricted use SCOs including copper, nickel, zinc and 4,4' – DDT at maximum concentrations of 95, 30, 214 and 0.015 ppm, which exceed their applicable SCOs of 50, 30, 109 and 0.0033 ppm, respectively. These contaminants are not considered contaminants of concern due to their low concentrations and low frequency of detection. Soil contamination has not been observed off-site above unrestricted use SCOs. Contaminated soil is not migrating off-site.

Groundwater: Chlorinated solvent contamination in the form of PCE and its breakdown contaminants are present in on-site and off-site monitoring wells, some of which are located on the former 1083 Route 32 site (NYSDEC site code: 356031). The most heavily contaminated well, MW-15, is located on-site adjacent to the source area described above. During the most recent sampling event in October 2021, the maximum concentrations for PCE, TCE, 1,2-DCE and vinyl chloride were detected at 410, 220, 2,300 and 180 parts per billion (ppb), respectively. The concentrations exceed their respective ambient water quality standards (AWQS) of 5, 5, 5 and 2 ppb. No SVOCs/metals/PCBs or pesticides were detected at concentrations exceeding their applicable AWQS.

PFAS – Perfluorooctanoic acid (PFOA) and PFOS have been detected in on-site and off-site groundwater at maximum concentrations of 18 and 21 parts per trillion (ppt), respectively, compared to their respective ambient water quality guidance values of 6.7 and 2.7 ppt.

Although off-site groundwater contamination was observed at concentrations above water quality standards in several wells, the dense nature of the site's silty soils and intermittent clay confining layer has limited the spread of groundwater contamination. The maximum off-site detections of TCE and 1,2- DCE were observed in monitoring well MW-07 (TCE) at concentrations of 41 ppb and 650 ppb, respectively. This well is located in the right-of-way near the site property boundary and is downgradient of the source area. The maximum off-site detection of vinyl chloride was in MW-08, which is located on the gas station property, at a concentration of 100 ppb. The off-site impacts were delineated and decrease as the plume migrates away from the site to the north. PCE was not detected in off-site monitoring wells above water quality standards. In addition, public water is not affected by the site contamination and is supplied to nearby properties.

Soil Vapor Intrusion: To determine whether actions are needed to address exposure related to soil vapor intrusion, concurrent collocated sets of sub-slab, indoor air and ambient air samples were collected as part of the RI for the 1083 Route 32 Site (#356031), a nearby site, in seven off-site structures and evaluated in accordance with the Guidance for Evaluating Soil Vapor Intrusion in the State of New York and its

updates. The on-site structure was not sampled because it is vacant. The maximum concentrations of PCE and TCE in sub-slab vapor samples on-site were as follows: 23 ug/m<sup>3</sup> and 2.9 ug/m<sup>3</sup>, respectively. Similarly, PCE and TCE were found in indoor air samples at maximum levels of 0.45 ug/m<sup>3</sup> and 0.41 ug/m<sup>3</sup>, respectively. Based on these sampling results, no further actions were recommended for the off-site structures. In the event that the on-site structure is to become occupied, a soil vapor intrusion investigation will first be required.

**Sediment Sampling:** Five sediment samples were collected from the nearby unnamed creek from the zero to six-inch interval and analyzed for the primary CoCs. Acetone, a common laboratory contaminant, was detected in two of the samples with a maximum concentration of 26 ppm. No other contaminants were detected in any of the samples.

**Special Resources Impacted/Threatened:** A step 1 Fish and Wildlife Impact Assessment was completed. The assessment determined that the site likely provides little value for wildlife habitat. Sampling indicated no site-related impacts to the nearby unnamed creek.

#### **6.4: Summary of Human Exposure Pathways**

This human exposure assessment identifies ways in which people may be exposed to site-related contaminants. Chemicals can enter the body through three major pathways (breathing, touching or swallowing). This is referred to as *exposure*.

Drinking contaminated groundwater is not expected because the area is served by public water. Contact with soil contamination is unlikely since a majority of the site is covered by buildings and pavement. Volatile organic compounds in the groundwater or soil may move into the soil vapor (air spaces within the soil), which in turn may move into overlying buildings and affect the indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. Because the site is vacant, the inhalation of site-related contaminants due to soil vapor intrusion does not represent a current concern. In addition, environmental sampling indicates soil vapor intrusion is not a concern for seven off-site buildings.

#### **6.5: Summary of the Remediation Objectives**

The objectives for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375. The goal for the remedial program is to restore the site to pre-disposal conditions to the extent feasible. At a minimum, the remedy shall eliminate or mitigate all significant threats to public health and the environment presented by the contamination identified at the site through the proper application of scientific and engineering principles.

The remedial action objectives for this site are:

## **Groundwater**

### **RAOs for Public Health Protection**

- Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards.
- Prevent contact with, or inhalation of volatiles, from contaminated groundwater.

### **RAOs for Environmental Protection**

- Restore ground water aquifer to pre-disposal/pre-release conditions, to the extent practicable.
- Prevent the discharge of contaminants to surface water.
- Remove the source of ground or surface water contamination.

## **Soil**

### **RAOs for Public Health Protection**

- Prevent ingestion/direct contact with contaminated soil.
- Prevent inhalation of or exposure from contaminants volatilizing from contaminants in soil.

### **RAOs for Environmental Protection**

- Prevent migration of contaminants that would result in groundwater or surface water contamination.
- Prevent impacts to biota from ingestion/direct contact with soil causing toxicity or impacts from bioaccumulation through the terrestrial food chain.

## **Soil Vapor**

### **RAOs for Public Health Protection**

- Mitigate impacts to public health resulting from existing, or the potential for, soil vapor intrusion into buildings at a site.

## **SECTION 7: SUMMARY OF THE PROPOSED REMEDY**

To be selected, the remedy must be protective of human health and the environment, be cost-effective, comply with other statutory requirements, and utilize permanent solutions, alternative technologies or resource recovery technologies to the maximum extent practicable. The remedy must also attain the remedial action objectives identified for the site, which are presented in Section 6.5. Potential remedial alternatives for the Site were identified, screened and evaluated in the FS report.

A summary of the remedial alternatives that were considered for this site is presented in Exhibit B. Cost information is presented in the form of present worth, which represents the amount of money invested in the current year that would be sufficient to cover all

present and future costs associated with the alternative. This enables the costs of remedial alternatives to be compared on a common basis. As a convention, a time frame of 30 years is used to evaluate present worth costs for alternatives with an indefinite duration. This does not imply that operation, maintenance, or monitoring would cease after 30 years if remediation goals are not achieved. A summary of the Remedial Alternatives Costs is included as Exhibit C.

The basis for the Department's proposed remedy is set forth at Exhibit D.

The proposed remedy is referred to as the Source Area Excavation and Treatment, Site Cover, with Site Management remedy. The remedial elements are depicted on Figure 7.

The estimated present worth cost to implement the remedy is \$2,350,000. The cost to construct the remedy is estimated to be \$1,136,000 and the estimated average annual site management cost is \$23,000.

The elements of the proposed remedy are as follows:

#### 1. Remedial Design

A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. This will include the implementation of a pre-design investigation to refine the limits of remediation and obtain the information necessary to develop the remedial design. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows:

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse gases and other emissions;
- Increasing energy efficiency and minimizing use of non-renewable energy;
- Conserving and efficiently managing resources and materials;
- Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;
- Maximizing habitat value and creating habitat when possible;
- Fostering green and healthy communities and working landscapes which balance ecological, economic and social goals;
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development; and
- Additionally, to incorporate green remediation principles and techniques to the extent feasible in the future development at this site, any future on-site buildings will include, at a minimum, a 20-mil vapor barrier/waterproofing membrane on the foundation to improve energy efficiency as an element of construction.

As part of the remedial design program, to evaluate the remedy with respect to green and sustainable remediation principles, an environmental footprint analysis will be completed. The environmental footprint analysis will be completed using an accepted environmental footprint analysis calculator such as SEFA (Spreadsheets for Environmental Footprint Analysis, USEPA), SiteWise<sup>(TM)</sup> (available in the Sustainable Remediation Forum [SURF] library) or similar NYSDEC accepted tool. Water consumption, greenhouse gas emissions, renewable and non-renewable energy use, waste reduction and material use will be estimated, and goals for the project related to these green and sustainable remediation metrics, as well as for minimizing community impacts, protecting habitats and natural and cultural resources, and promoting environmental justice, will be incorporated into the remedial design program, as appropriate. The project design specifications will include detailed requirements to achieve the green and sustainable remediation goals. Further, progress with respect to green and sustainable remediation metrics will be tracked during implementation of the remedial action and reported in the Final Engineering Report (FER), including a comparison to the goals established during the remedial design program.

Additionally, the remedial design program will include a climate change vulnerability assessment, to evaluate the impact of climate change on the project site and the proposed remedy. Potential vulnerabilities associated with extreme weather events (e.g., hurricanes, lightning, heat stress and drought), flooding, and sea level rise will be identified, and the remedial design program will incorporate measures to minimize the impact of climate change on potential identified vulnerabilities.

## 2. Excavation

Excavation and off-site disposal of contaminant source areas, including:

- Grossly contaminated soil, as defined in 6 NYCRR Part 375-1.2(u);
- Soil with visual waste material or non-aqueous phase liquid;
- Soils which exceed the protection of groundwater soil cleanup objectives (PGWSCOs), as defined by 6 NYCRR Part 375-6.8 for those contaminants found in site groundwater above standards; and
- Soils that create a nuisance condition, as defined in Commissioner Policy CP-51 Section G.

Approximately 1,300 tons of soil and fill material, contaminated with the COCs, will be removed, and shipped off-site for disposal. Contaminated soil and fill from the source area will be removed to the depth of the water table at approximately 12 feet deep. Groundwater recovery rates will be evaluated during design to assess potential for deeper soil removal. Collection and analysis of confirmation samples at the remedial excavation depth will be used to verify the limits of the soil removal.

To ensure proper handling and disposal of excavated material, waste characterization sampling will be completed for all identified contaminated site material. Waste characterization sampling will be performed exclusively for the purposes of off-site



disposal in a manner suitable to receiving facilities and in conformance with applicable federal, state and local laws, rules, and regulations and facility-specific permits.

### 3. Backfill

Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to complete the backfilling of the excavation and establish the designed grades at the site. The site will be re-graded to accommodate installation of a cover system as described in remedy element bullet #5.

### 4. Enhanced Bioremediation

In-situ enhanced biodegradation will be employed to treat contaminated groundwater in the source area that is located along the southern perimeter of the dry-cleaning building foundation. The source area is depicted on Figure 5. The biological breakdown of contaminants through anaerobic reductive dechlorination will be enhanced by placement of a molasses and water solution, or similar material into the subsurface to promote microbe growth. The material will be mixed into the soil at the bottom of the excavation to treat remaining impacted soil below the groundwater table.

Groundwater monitoring will be completed on-site and in down-gradient off-site areas for contaminants of concern. The treatment zone will also be monitored for dissolved oxygen and oxidation/reduction potential. The results of the monitoring program will be evaluated and, if needed, additional groundwater treatment will be implemented, which could potentially include areas downgradient and off-site, as a contingency to ensure that off-site groundwater concentrations meet remedial cleanup goals.

### 5. Cover System

A site cover will be required in areas where the upper one foot of exposed surface soil will exceed the commercial soil cleanup objectives (SCOs), to allow for future commercial (and industrial) use of the site. Where a soil cover is to be used it will be a minimum of one foot of soil placed over a demarcation layer, with the upper six inches of soil of sufficient quality to maintain a vegetative layer. Soil cover material, including any fill material brought to the site, will meet the SCOs for cover material for the use of the site as set forth in 6 NYCRR Part 375-6.7(d). Substitution of other materials and components may be allowed where such components already exist or are a component of the tangible property to be placed as part of site redevelopment. Such components may include, but are not necessarily limited to: pavement, concrete, paved surface parking areas, sidewalks, building foundations and building slabs.

The final limits of the site's cover system will be determined during the remedial design. Additional surface soil sampling will be completed to assess whether the existing soil meets the cover system requirements.

## 6. Institutional Control

Imposition of an institutional control in the form of an environmental easement for the controlled property which will:

- Require the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
- Allow the use and development of the controlled property for commercial use as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- Restrict the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County DOH; and
- Require compliance with the Department approved Site Management Plan.

## 7. Site Management Plan

A Site Management Plan is required, which includes the following:

1. An Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective:

Institutional Controls: The Environmental Easement discussed in Paragraph 6 above.

Engineering Controls: The soil cover discussed in Paragraph 5.

This plan includes, but may not be limited to:

- An Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- Descriptions of the provisions of the environmental easement including any land use and/or groundwater use restrictions;
- A provision should redevelopment occur to ensure no soil exceeding protection of groundwater concentrations will remain below storm water retention basin or infiltration structures;
- A provision for evaluation of the potential for soil vapor intrusion for any occupied buildings on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
- A provision for a soil vapor intrusion evaluation at the off-site structure, where access for sampling was previously denied, in the event that access can be obtained from new ownership;
- A provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in Paragraph 5

- above will be placed in any areas where the upper one foot of exposed surface soil exceed the applicable soil cleanup objectives (SCOs);
- Provisions for the management and inspection of the identified engineering controls;
  - Maintaining site access controls and Department notification; and
  - The steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.

2. A Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:

- Monitoring of groundwater to assess the performance and effectiveness of the remedy, and determine whether additional in-situ groundwater treatment is warranted to achieve remedial goals;
- A schedule of monitoring and frequency of submittals to the Department; and
- Monitoring for vapor intrusion for any buildings on the site, as may be required by the Institutional and Engineering Control Plan discussed above.

## **Exhibit A**

### **Nature and Extent of Contamination**

This section describes the findings of the Remedial Investigation for all environmental media that were evaluated. As described in Section 6.1, samples were collected from various environmental media to characterize the nature and extent of contamination.

For each medium for which contamination was identified, a table summarizes the findings of the investigation. The tables present the range of contamination found at the site in the media and compares the data with the applicable SCGs for the site. The contaminants of concern at the site are volatile organic compounds (VOCs). For comparison purposes, the SCGs are provided for each medium that allows for unrestricted use. For soil, if applicable, the Restricted Use SCGs identified in Section 4 and Section 6.1.1 are also presented.

### **Waste/Source Areas**

As described in the RI report, waste/source materials were identified at the site and are impacting groundwater and soil.

Wastes are defined in 6 NYCRR Part 375-1.2 (aw) and include solid, industrial and/or hazardous wastes. Source Areas are defined in 6 NYCRR Part 375 (au). Source areas are areas of concern at a site where substantial quantities of contaminants are found which can migrate and release significant levels of contaminants to another environmental medium. Wastes and Source areas were identified at the site include,

A waste/source area was identified near the foundation of the former on-site dry cleaner that is located along the southern boundary of the site. The source is located near the “buried debris pile” area, as shown on Figure 2. The debris pile was initially discovered in 2014 during the investigation of the former 1083 Route 32 Site (#356031) and was further assessed during the site investigation for Rosendale Cleaners. During this investigation, it was observed that debris was present throughout the entire southern area of the property, not just in the pile. The debris area contains miscellaneous material such as brick, clothing and metal, which may have been disposed to the subsurface following the fire at the historic dry cleaner structure. The debris area is generally confined to the shallow subsurface zone (upper 5 feet). During the RI, an area of chlorinated solvent contaminated soil was identified within and beneath a portion of the debris area. The contaminated soil is confined to the site and includes PCE and its breakdown products TCE, cis-1,2 DCE and vinyl chloride. Data collected during the investigation supports that a significant quantity of hazardous waste was released into this area which is impacting nearby soil and groundwater.

The waste/source areas identified will be addressed in the remedy selection process.

### **Groundwater**

Groundwater samples were collected during the RI from 16 locations, both on-site and off-site, to determine the nature and extent of contamination in the groundwater. Two (2) rounds of groundwater samples (June 2018, October 2021) were collected for a total of 32 samples. The monitoring wells at 14 of the locations are screened in the shallow overburden at depths ranging from 5 to 25 feet deep.

Two deeper overburden wells were installed near the source area with screened intervals ranging from 40 to 70 feet deep. Bedrock was not encountered during the investigation.

As seen in Table 1, several samples exceeded the SCGs for the contaminants of concern. Impacts were confined to the shallow overburden groundwater.

**Table 1 – Groundwater**

Detected Constituents	Concentration Range Detected (ppb) <sup>a</sup>	SCG <sup>b</sup> (ppb)	Frequency Exceeding SCG
<b>VOCs</b>			
Tetrachloroethene	ND – 990	5	3 of 32
Trichloroethene	ND – 780	5	6 of 32
Cis-1,2 Dichloroethene	ND – 5000	5	19 of 32
Vinyl Chloride	ND – 700	5	17 of 32
PFOA	ND - 0.018	0.01	4 of 6
PFOS	ND – 0.021	0.01	3 of 6

a - ppb: parts per billion, which is equivalent to micrograms per liter, ug/L, in water.

b- SCG: Standard Criteria or Guidance - Ambient Water Quality Standards and Guidance Values (TOGs 1.1.1), 6 NYCRR Part 703, Surface water and Groundwater Quality Standards, and Part 5 of the New York State Sanitary Code (10 NYCRR Part 5).

Data indicates that a chlorinated solvent plume has migrated from the source area to the north-northwest as seen on Figure 3. The highest concentrations of chlorinated solvents were detected in the source area and the plume extends off-site and onto several nearby properties.

Samples were also collected from four off-site and two on-site monitoring wells to assess for PFAS compounds. As seen on Figure 4, PFAS compounds were detected above SCGs across the site and in downgradient areas. However, the contaminants are not considered primary contaminants of concern due their slight exceedance of groundwater quality standards.

Based on the findings of the RI, the past disposal of hazardous waste has resulted in the contamination of groundwater. The site contaminants that are considered to be the primary contaminants of concern which will drive the remediation of groundwater to be addressed by the remedy selection process are: tetrachloroethene (PCE) and its breakdown products trichloroethene (TCE), Cis 1,2 Dichloroethene and Vinyl Chloride.

## Soil

Both surface and subsurface soil samples were collected during the RI. Five surface soil samples were collected from the 0-2" interval. In addition, 21 soil borings were advanced to assess subsurface conditions across the site as shown on Figure 5. Thirty-five (35) subsurface soil samples were collected at depths ranging from 4 to 18 feet deep. Soil samples were logged in five-foot intervals and screened using a photoionization detector (PID). Samples were collected from areas that exhibited the highest

PID readings and/or where odors or staining were observed. The highest PID readings were observed in the source area around the 5 to 8-foot depth interval. The concentrations of chlorinated solvent contamination were well above applicable SCOs at many locations, but the concentrations of observed soil impacts decreased significantly with depth. Limited soil contamination was detected below the water table. Table 2 includes the results of the soil sampling.

**Table 2 - Soil**

Detected Constituents	Concentration Range Detected (ppm) <sup>a</sup>	Unrestricted SCG <sup>b</sup> (ppm)	Frequency Exceeding Unrestricted SCG	Restricted Use SCG <sup>c</sup> (ppm)	Frequency Exceeding Restricted SCG
<b>VOCs</b>					
Tetrachloroethene	ND – 90,000	1.3	22 of 35	1.3	22 of 35
Trichloroethene	ND - 19	0.47	15 of 35	0.47	15 of 35
Cis-1,2 dichloroethene	ND - 28	0.25	22 of 35	0.25	22 of 35
Vinyl Chloride	ND – 1.6	0.02	9 of 35	0.02	9 of 35
PFOS	ND – 0.0076	0.00088	2 of 4	0.001	2 of 4
<b>Inorganics</b>					
Copper	ND – 94.9	50	1 of 7	1,720	0 of 7
Nickel	ND – 30.4	30	1 of 7	130	0 of 7
Zinc	ND - 214	109	1 of 7	2,480	0 of 7
<b>Pesticides/PCBs</b>					
4,4'-DDT	ND – 0.015	0.0033	1 of 7	136	0 of 7

a - ppm: parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil;

b - SCG: Part 375-6.8(a), Unrestricted Soil Cleanup Objectives.

c - SCG: Part 375-6.8(b), Restricted Use Soil Cleanup Objectives for the Protection of Groundwater.

In addition to the chlorinated solvent contamination that was observed, soil exceedances for various metals, pesticides and PFOS were detected during the RI. The metals copper, nickel and zinc were detected in a sample, collected from the debris area, at concentrations above unrestricted levels. There were also detections of PFOS and the pesticide, 4,4' DDT observed in source area soil samples. However, the number of detections of these compounds were limited and generally below their associated restricted use soil cleanup objectives and protection of groundwater standards. Therefore, these contaminants are not considered site specific contaminants of concern.

Based on the findings of the Remedial Investigation, the past disposal of hazardous waste has resulted in the contamination of soil. The site contaminants identified in soil which are considered to be the primary contaminants of concern, to be addressed by the remedy selection process are,

tetrachloroethene (PCE) and its breakdown products trichloroethene (TCE), Cis 1,2 Dichloroethene (1, 2 DCE) and Vinyl Chloride.

### **Sediments**

Sediment samples were collected during the RI to evaluate conditions in the nearby “unnamed creek”. The creek is located along the southern perimeter of the site as seen on Figure 6. Five samples were collected from the 0 to 6-inch depth interval from locations adjacent to the source area.

No site-related sediment contamination of concern was identified during the RI. Therefore, no remedial alternatives need to be evaluated for sediment.

### **Soil Vapor**

The evaluation of the potential for soil vapor intrusion resulting from the presence of site related soil or groundwater contamination was evaluated by the sampling of sub-slab soil vapor under structures, and indoor air inside structures. Due to the presence of buildings in the impacted area, a full suite of samples were collected to evaluate whether soil vapor intrusion was occurring. However, no sampling was completed on-site as the on-site structure is in disrepair and unoccupied.

Notices were sent to eight nearby properties (six residential, two commercial) requesting permission to collect soil vapor intrusion samples at their buildings. The properties were selected based on their location relative to the site’s groundwater plume. Sampling was successfully completed at seven of the eight properties as shown on Figure 6. In general, one collocated sub-slab sample and one indoor air sample were collected from each structure. An ambient air sample was also collected during each event. No contaminants were detected above the action levels outlined in the NYSDOH Soil Vapor Intrusion Decision Matrices.

Note that the owner of the commercial property that declined sampling had initially verbally denied access to the NYSDEC for soil vapor intrusion sampling. More recently, a follow-up sampling request letter was sent to the owner as another attempt to gain access, but no response was received.

Based on the concentration detected, and comparison with the NYSDOH Soil Vapor Intrusion Guidance, no site-related soil vapor contamination of concern was identified during the RI for off-site buildings. A soil vapor intrusion evaluation must be performed if any building on-site is occupied in the future, as the current on-site building is vacant. Therefore, no remedial alternatives need to be evaluated for soil vapor.

## Exhibit B

### Description of Remedial Alternatives

The following alternatives were considered based on the remedial action objectives (see Section 6.5) to address the contaminated media identified at the site as described in Exhibit A.

#### **Alternative 1: No Action**

The No Action Alternative is evaluated as a procedural requirement and as a basis for comparison. This alternative leaves the site in its present condition and does not provide any additional protection to public health and the environment.

#### **Alternative 2: Source Area Excavation and Treatment with Site Management**

Alternative 2 includes the excavation of approximately 1,300 tons of contaminated material from the on-site source area down to the water table. The volume includes the removal of VOC impacted debris material from within the subsurface debris pile area as well as the chlorinated solvent impacted soil below. All soil will be transported off-site in properly permitted trucks for treatment and/or disposal. Post-excavation soil samples will be collected to document the limits of contaminant removal. Prior to backfilling the excavation, approximately 9 tons of enhanced bio-remediation treatment reagent will be mixed into the soil beneath the excavation to promote breakdown of contaminants below the groundwater table at approximately twelve feet. The area would then be restored to its previous grade using clean soil, from an approved source, that meets the applicable soil cleanup objectives.

Alternative 2 requires a groundwater monitoring program to assess the long-term groundwater trends both on-site and off-site to ensure cleanup goals are achieved. Samples will be analyzed for PCE, all its breakdown products, and for other chemical indicators of biological decay. The sampling will initially be completed quarterly for the first year, with the frequency to be adjusted as necessary thereafter.

Alternative 2 also utilizes institutional and engineering controls (ICs & ECs). The ICs include groundwater use and land use restrictions to prevent contact with remaining contaminated soil and groundwater. The EC for the site is a soil cover system which will be maintained for commercial use. A Site Management Plan (SMP) will be prepared to specify the details of the ICs and ECs and document the procedures necessary to manage the site's remaining contamination and long-term monitoring activities. The SMP will include a provision for additional groundwater treatment if determined necessary during site management. These costs are not included below estimates.

<i>Present Worth:</i> .....	\$ 2,350,000
<i>Capital Cost:</i> .....	\$ 1,136,000
<i>Annual Costs:</i> .....	\$ 23,000

#### **Alternative 3: Source Excavation and In-Situ Groundwater Treatment with Site Management**

Alternative 3 includes the same soil source area removal activities as with Alternative 2.



Alternative 3 also requires the implementation groundwater treatment activities utilizing either in-situ chemical oxidation and/or bioremediation to control off-site migration of contamination. Depending on the treatment, the contaminants would either be destroyed or broken down through the process of anaerobic oxidation. The groundwater treatment area would be expanded to address not only the source area, but also the downgradient perimeter of the site. The remedial design program would include evaluation of groundwater parameters and an injection pilot scale study. The treatment material will be applied into the subsurface using approximately 42 injection points. It is estimated that there will be one initial round of injection treatment with additional rounds if necessary.

As with Alternative 2, a long-term groundwater monitoring program would be implemented as well as institutional and engineering controls. An SMP will also be required to manage the site’s remaining contamination and long-term monitoring activities.

<i>Present Worth:</i> .....	\$ 3,242,000
<i>Capital Cost:</i> .....	\$ 2,131,000
<i>Annual Costs:</i> .....	\$ 30,800

**Alternative 4: Source Excavation and Passive Reactive Barrier Wall with Site Management**

Alternative 4 includes the same soil source area removal activities as with Alternatives 2 and 3.

However, instead of using injection points as in Alternative 3, a passive reactive barrier (PRB) will be utilized along the downgradient perimeter of the site to control off-site migration of contaminants in groundwater. A PRB is a subsurface trench typically filled with reactive media designed to control migration of contaminants using processes such as bioremediation or adsorption. The type of media to be utilized, as well as the physical dimensions of the PRB, will be determined during design.

As with Alternatives 2 and 3, a long-term groundwater monitoring program will be implemented as well as institutional and engineering controls. An SMP will also be required to manage the site’s remaining contamination and long-term monitoring activities.

<i>Present Worth:</i> .....	\$ 3,213,000
<i>Capital Cost:</i> .....	\$ 2,262,000
<i>Annual Costs:</i> .....	\$ 20,500

**Alternative 5: Restoration to Pre-Disposal or Unrestricted Conditions**

This alternative achieves all of the SCGs discussed in Section 6.1.1 and Exhibit A and soil meets the unrestricted soil clean objectives listed in Part 375-6.8 (a). This alternative will include removal and off-site disposal of all impacted soil with concentrations above unrestricted use soil cleanup objectives. It is estimated that approximately 5,300 tons of soil would be removed, however the final volume will be determined during remedial design. The excavation area will be backfilled with clean material meeting the soil cleanup objectives of the site’s anticipated future use. The soil removal is also expected to include dewatering activities and the generated fluids will either require on-site treatment prior to discharge or be sent off-site for disposal.

In addition, Alternative 5 includes groundwater treatment implemented through bioremediation injections. The groundwater treatment area is expanded from previous alternatives to include off-site

areas where chlorinated solvent contaminants are present above groundwater quality standards. It is expected that several groundwater treatment injection events will be needed to reach ambient groundwater quality standards on-site and off-site. Groundwater monitoring will be conducted to confirm treatment standards have been met.

*Capital Cost:* ..... \$ 10,528,000

**Exhibit C****Remedial Alternative Costs**

<b>Remedial Alternative</b>	<b>Capital Cost (\$)</b>	<b>Annual Costs (\$)</b>	<b>Total Present Worth (\$)</b>
No Action	0	0	0
Source Area Excavation and Treatment with Site Management	1,136,000	23,000	2,350,000
Source Excavation and In-situ Groundwater Treatment with Site Management	2,131,000	30,800	3,242,000
Source Excavation and Passive Reactive Barrier Wall with Site Management	2,262,000	20,500	3,213,000
Restoration to Pre-Disposal or Unrestricted Conditions	10,528,000	0	10,528,000

## Exhibit D

### **SUMMARY OF THE PROPOSED REMEDY**

The Department is proposing Alternative 2, Source Area Removal, Treatment and Site Cover with Site Management as the remedy for this site. Alternative 2 would achieve the remediation goals for the site by excavating and removing the source of the site's chlorinated solvent contamination and treating remaining contamination to reduce the concentrations of contaminants in groundwater. The elements of this remedy are described in Section 7. The proposed remedy is depicted in Figure 7.

### **Basis for Selection**

The proposed remedy is based on the results of the RI and the evaluation of alternatives. The criteria to which potential remedial alternatives are compared are defined in 6 NYCRR Part 375. A detailed discussion of the evaluation criteria and comparative analysis is included in the FS report.

The first two evaluation criteria are termed "threshold criteria" and must be satisfied in order for an alternative to be considered for selection.

1. Protection of Human Health and the Environment. This criterion is an overall evaluation of each alternative's ability to protect public health and the environment.

Alternative 1 (No Action) does not provide any protection to public health and the environment and thus will not be evaluated further.

The proposed remedy, Alternative 2 would satisfy this criterion by removing the chlorinated solvent impacted soil in the source area above/slightly into (as practicable) the water table and treating the remaining contamination below the water table. Therefore, Alternative 2 will also address the contamination in groundwater that is emanating from the on-site source area, thereby addressing the most significant threat to public health and the environment. Alternative 3 also removes the contaminated soil from above/slightly into (as practicable) the water table, in the source area, but further treats on-site groundwater contamination by injection of bioremediation or chemical oxidation media. Similar to Alternative 3, Alternative 4 meets this criterion by removing contaminated soil from the source area. However, Alternative 4 utilizes a permeable reactive barrier wall along the downgradient perimeter of the site to treat groundwater instead of injections. Alternatives 2, 3 and 4 would all be expected to address potential soil vapor intrusion impacts to any future buildings constructed on the site. Alternative 5 would be the most protective to human health and the environment as this remedy removes all contaminated soil above unrestricted soil cleanup objectives and would treat contaminated soil on-site and off-site.

2. Compliance with New York State Standards, Criteria, and Guidance (SCGs). Compliance with SCGs addresses whether a remedy will meet environmental laws, regulations, and other standards and criteria. In addition, this criterion includes the consideration of guidance which the Department has determined to be applicable on a case-specific basis.

All of the retained Alternatives are expected to comply with SCGs, but will achieve the objectives over different time frames. Alternative 2 will comply with the SCGs by removing the majority of contaminated soil in the source area and treating remaining contaminated soil and groundwater. Alternative 2 will

reduce the levels of groundwater contamination over time and achieve groundwater quality standards to the extent practicable. Similarly, Alternatives 3 and 4 will address the contaminated soil in the source area. The timeframe for these alternatives to reach groundwater quality standards is expected to be less than Alternative 2 because of the additional groundwater treatment they include. However, if Alternative 2 requires additional groundwater treatment during Site Management, the timeframe to reach cleanup goals may change. Alternative 5 is expected to comply with this criterion to the highest degree of certainty since it requires the removal of all soil above unrestricted use SCOs and includes continued groundwater treatment until contaminant levels reach groundwater quality standards.

The next eight "primary balancing criteria" are used to compare the positive and negative aspects of each of the remedial strategies.

3. Long-term Effectiveness and Permanence. This criterion evaluates the long-term effectiveness of the remedial alternatives after implementation. If wastes or treated residuals remain on-site after the selected remedy has been implemented, the following items are evaluated: 1) the magnitude of the remaining risks, 2) the adequacy of the engineering and/or institutional controls intended to limit the risk, and 3) the reliability of these controls.

All of the remaining Alternatives are expected to provide effective and permanent cleanups in the long-term. Alternative 5 provides the most certain long-term effectiveness and permanence since it will remove all of the soil contamination above unrestricted soil cleanup goals. Alternative 5 also provides extensive groundwater treatment both on-site and off-site, thus eliminating the need for long-term use restrictions.

Alternatives 2, 3 and 4 provides for a high degree of long-term effectiveness by removing the majority of contaminated soil from the source area and treating remaining soil/groundwater contamination in-situ. Since Alternatives 2, 3 and 4 leave contamination at the site, an environmental easement and long-term groundwater monitoring will be required. In addition, each of these Alternatives will require evaluations to assess the potential for soil vapor intrusion. The duration of these restrictions will likely be marginally greater for Alternative 2 since Alternatives 3 and 4 include additional groundwater treatment. However, the timeframe for Alternative 2 to reach remedial goals may change if additional groundwater treatment is required.

4. Reduction of Toxicity, Mobility or Volume. Preference is given to alternatives that permanently and significantly reduce the toxicity, mobility or volume of the wastes at the site.

Alternative 2 will significantly reduce the toxicity, mobility and volume of contamination at the site by removing most of the volume of contaminated soil from the source area, including the most heavily impacted soil. Alternative 2 also treats the contaminated soil at and beneath the groundwater table to reduce mobility of remaining contamination. Alternatives 3 and 4 comply with this criterion in a similar manner as Alternative 2 but offers increased reduction of contaminant mobility due to their treatment of a greater volume of groundwater impacts. However, Alternative 2 would treat additional contaminant volume if necessary, during Site Management. Alternative 5, by removing all the contaminated soil to pre-disposal conditions and offering the most robust groundwater treatment, provides the greatest reduction of contaminant toxicity, mobility and volume. All remedial alternatives will require groundwater use restrictions and provisions for soil vapor intrusion, except for Alternative 5.

5. Short-term Impacts and Effectiveness. The potential short-term adverse impacts of the remedial

action upon the community, the workers, and the environment during the construction and/or implementation are evaluated. The length of time needed to achieve the remedial objectives is also estimated and compared against the other alternatives.

Alternatives 2 through 5 all have some degree of short-term impacts which can be readily addressed. All three have the potential to create human exposure of contaminants to remediation workers, as well as nuisance conditions (noise or dust during construction). These impacts can be mitigated with engineering controls during construction. Duration of construction for the three alternatives is estimated to be similar and will include identical controls (e.g., CAMP, limitations on working hours). Each remedy requires the excavation and off-site disposal of soil, which will result in the removal of nearby trees and increased truck traffic in the community. The magnitude of these impacts is similar for Alternatives 2, 3 and 4, however Alternative 5 requires the excavation of significantly more soil and subsequently more backfill, and thus more trucking is utilized. Alternative 5 will also require the need for off-site access to implement the additional groundwater treatment. Alternative 2 is expected to take slightly longer to reach the remedial goal than Alternatives 3 and 4; however, this timeframe could change if additional groundwater treatment is necessary. Alternative 5 is expected to require the least amount of time to reach the desired objectives.

6. Implementability. The technical and administrative feasibility of implementing each alternative are evaluated. Technical feasibility includes the difficulties associated with the construction of the remedy and the ability to monitor its effectiveness. For administrative feasibility, the availability of the necessary personnel and materials is evaluated along with potential difficulties in obtaining specific operating approvals, access for construction, institutional controls, and so forth.

All remedial alternatives are expected to be implementable as they use methods and technologies that are proven to address chlorinated solvent contamination and no significant physical or other implementation barriers exist at the site. Alternative 2 is the most implementable since the in-situ portion of the remedy requires direct mixing of reagent with contaminated soil, whereas Alternatives 3 and 4 require implementation of subsurface technologies (injections, barrier wall) that will require additional pre-design testing. The in-situ portion of Alternatives 3 and 4 will likely have some degree of uncertainty regarding their ability to provide sufficient contact with remaining contamination in the subsurface to effectively treat groundwater. Alternative 5 is the most difficult to implement as it will remove significantly more soil than the other alternatives which will require excavation dewatering, increased truck traffic and sitewide restoration activities. To implement Alternative 5, off-site access agreements will need to be obtained from property owners, which may be difficult.

7. Cost-Effectiveness. Capital costs and annual operation, maintenance, and monitoring costs are estimated for each alternative and compared on a present worth basis. Although cost-effectiveness is the last balancing criterion evaluated, where two or more alternatives have met the requirements of the other criteria, it can be used as the basis for the final decision.

Alternative 2 is the most cost-effective remedy aside from no action Alternative 1, as it provides similar source removal and groundwater benefits as the other remedial Alternatives, but for significantly less cost. Alternatives 3 and 4 have higher capital costs than Alternative 2 due to their expanded groundwater treatment efforts, but are expected to have similar long-term monitoring costs. While Alternative 5 will have no long-term costs, it will have significantly higher capital costs compared to the other Alternatives since the remedy addresses greater volumes of soil and groundwater.

8. Land Use. When cleanup to pre-disposal conditions is determined to be infeasible, the Department may consider the current, intended, and reasonable anticipated future land use of the site and its surroundings in the selection of the soil remedy.

All remedial alternatives are expected to be protective to meet the future anticipated commercial use of the property. Alternatives 2, 3 and 4 each remove the majority of the contaminated soil from the site, including the most heavily impacted soil. However, each of these alternatives will leave remaining contamination at the site. The remaining contamination can easily be effectively controlled through the implementation of a comprehensive Site Management Plan. Alternative 5 does not leave contaminated soil at the site and will not require restrictions.

9. Community Acceptance. Concerns of the community regarding the investigation, the evaluation of alternatives, and the PRAP are evaluated. A responsiveness summary will be prepared that describes public comments received and how the Department will address the concerns raised. If the selected remedy differs significantly from the proposed remedy, notices to the public will be issued describing the differences and reasons for the changes.

10). Green and Sustainable Remediation: Potential Indirect Environmental Impact of the Remedy. For this criterion, preference is given to alternatives that have the potential to remediate the site with the lowest potential negative environmental impact, such as CO<sub>2</sub> emissions. This criterion also considers the resilience of alternatives to potential climate change effects such as sustained changes in average temperatures, increased heavy precipitation events, and increased coastal flooding. A detailed analysis can be found in the January 2023 Feasibility Study.

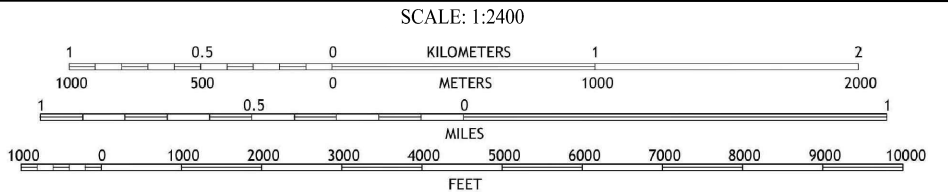
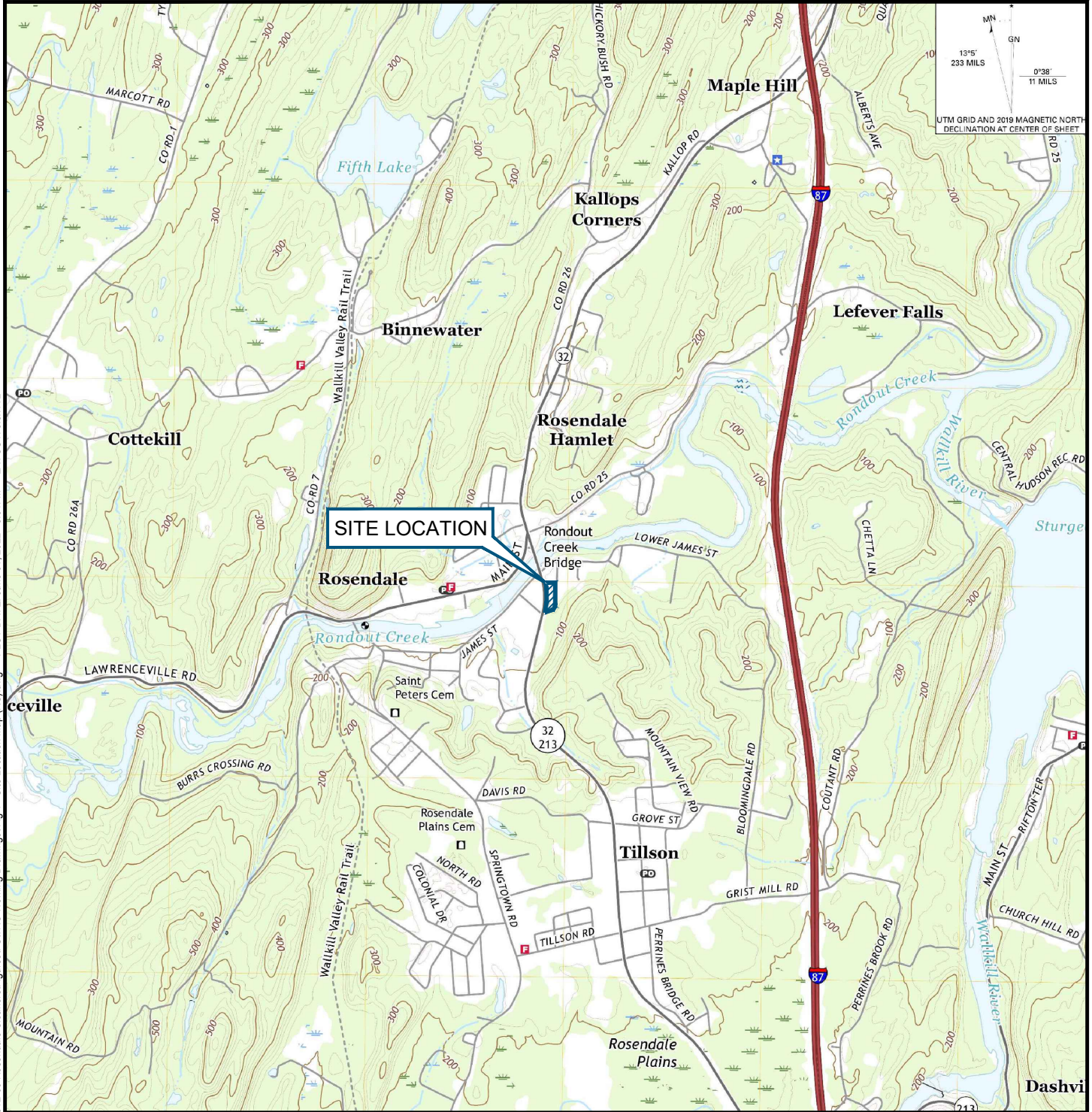
Alternatives 5 will have the highest potential environmental impact as it removes the most contaminated soil and requires the treatment of large quantities of contaminated groundwater. In addition, the injection footprint of Alternative 5 is the largest of all the remedies. This will necessitate additional trucking of material and energy use for treatment of the groundwater. Alternatives 3 and 4 will have a smaller environmental footprint than Alternative 5 as they remove less soil and have a smaller treatment zone. However, Alternative 2 has the lowest overall environmental impact as it focuses primarily on the source area and removing only the most heavily impacted soil.

None of the proposed remedies are expected to be impacted by climate change as they do not require maintaining any aboveground infrastructure. Alternatives 2, 3 and 4 require soil covers that could potentially be impacted by long-term climate change. These cover systems will be required to be maintained and repaired as needed.

Alternative #2 is being proposed because, as described above, it satisfies the threshold criteria and provides the best balance of the balancing criterion.



6.5411 - ATTACHED XREFS: ... ATTACHED IMAGES: NY\_Rosendale\_20190923\_T.M.  
 DRAWING NAME: B:\Projects\NYS\DEC\009812\Work Assignments\0009812-08 Rosendale Cleaners\Figures\FSTRC Working Drawings\Fig 1 - Site Location Map (RC).dwg -- PLOT DATE: June 01, 2022 - 3:04PM -- LAYOUT: 8.5x11L



MAP INCLUDES INFORMATION FROM THE FOLLOWING MAP SHEET(S):  
 TP, ROSENDALE, NY, 7.5 MINUTE DATED 2019.

MAP OBTAINED THROUGH USE OF TOPOVIEW WITH THE INTERFACE CREATED BY THE NATIONAL GEOLOGIC MAP DATABASE PROJECT (NGMDB), IN SUPPORT OF THE TOPOGRAPHIC MAPPING PROGRAM, MANAGED BY THE USGS NATIONAL GEOSPATIAL PROGRAM (NGP).

NEW YORK  
 QUADRANGLE LOCATION

10 Maxwell Drive, Suite 200  
 Clifton Park, NY 12065  
 Phone: 518.348.1190  
 www.TRCompanies.com

PROJECT:  
**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
 ROSENDALE CLEANERS SITE - SITE NO. 356050  
 TOWN OF ROSENDALE, NEW YORK**

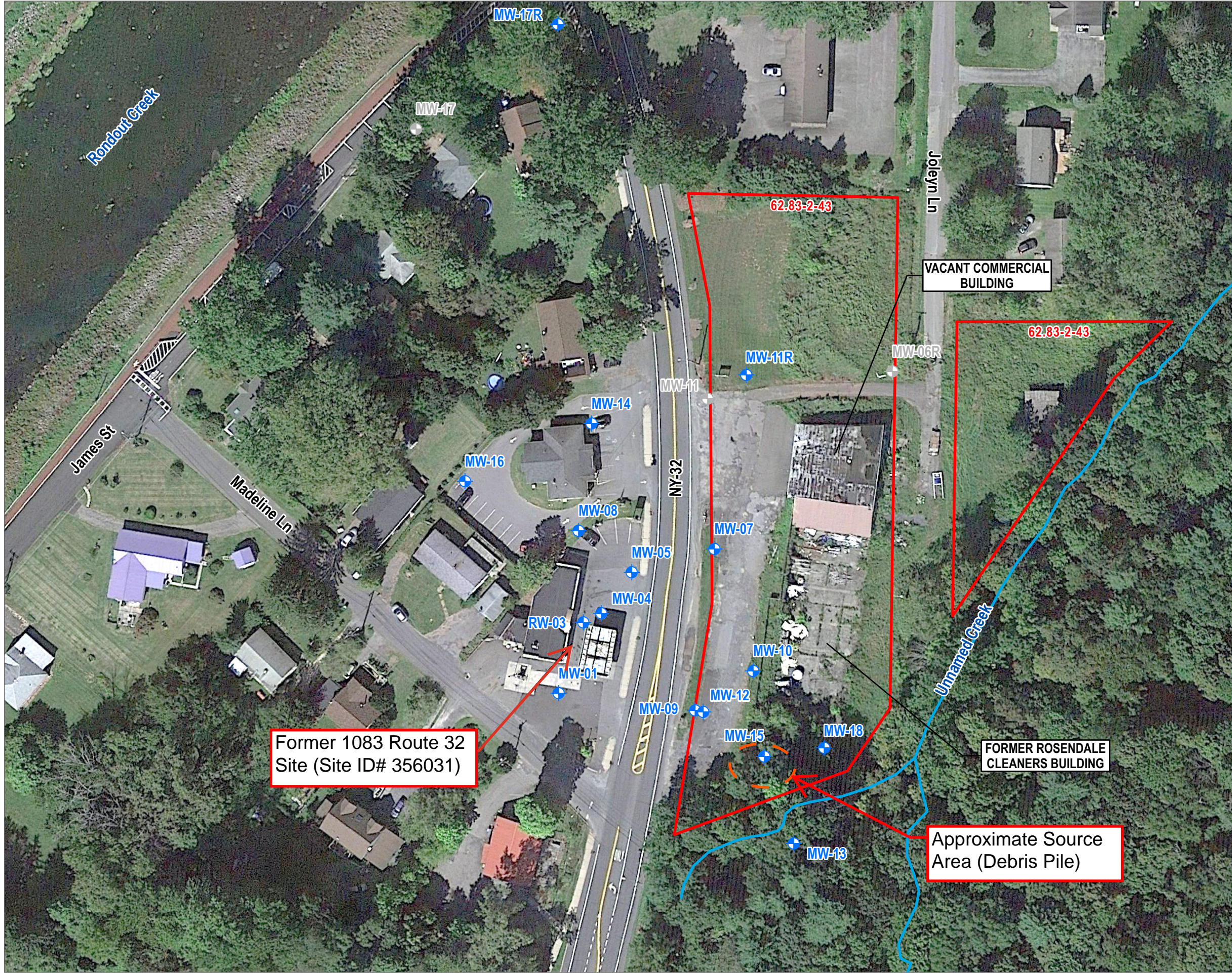
TITLE:  
**SITE LOCATION MAP**

DRAWN BY:	H. DELGADO
CHECKED BY:	T. SHANLEY
APPROVED BY:	H. NICHOLS
DATE:	JUNE 2022
PROJ. NO.:	403739.0000.0000
FILE:	Fig 1 - Site Location Map (RC).dwg

**FIGURE 1**



Coordinate System: NAD 1983 StatePlane New York East FIPS 3101 Feet, Map Rotation: 0  
 - Saved By: L.LILL on 2/22/2022, 08:37:27 AM, File Path: T:\PROJECTS\NYSD\EC-403739 - Rosendale Cleaners Site Layout.aprx, Layout Name: Figure 2 - Rosendale Cleaners Site Layout Map



**LEGEND (SYMBOLS NOT TO SCALE)**

- MONITORING WELL
- DESTROYED/ABANDONED MONITORING WELL
- Site Boundary
- LIMITS OF BURIED DEBRIS PILE (2014)

**NOTES:**

1. SITE FEATURES, LOCATIONS AND PROPERTY BOUNDARIES ARE APPROXIMATE.



1:900 BASE MAP: GOOGLE EARTH IMAGERY, 2019  
 1" = 75' DATA SOURCES: TRC  
 SHEET SIZE: 11X17L  
 0 75 150 FEET

Former 1083 Route 32 Site (Site ID# 356031)

Approximate Source Area (Debris Pile)

PROJECT:  
 NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
 ROSENDALE CLEANERS - SITE NO. 356050  
 TOWN OF ROSENDALE, NEW YORK

TITLE:  
**SITE LAYOUT MAP**

DRAWN BY: L. LILL	PROJ. NO.: 403739.0000.0000
CHECKED BY: J. KING	<b>FIGURE 2</b>
APPROVED BY: J. MAGDA	
DATE: FEBRUARY 2022	

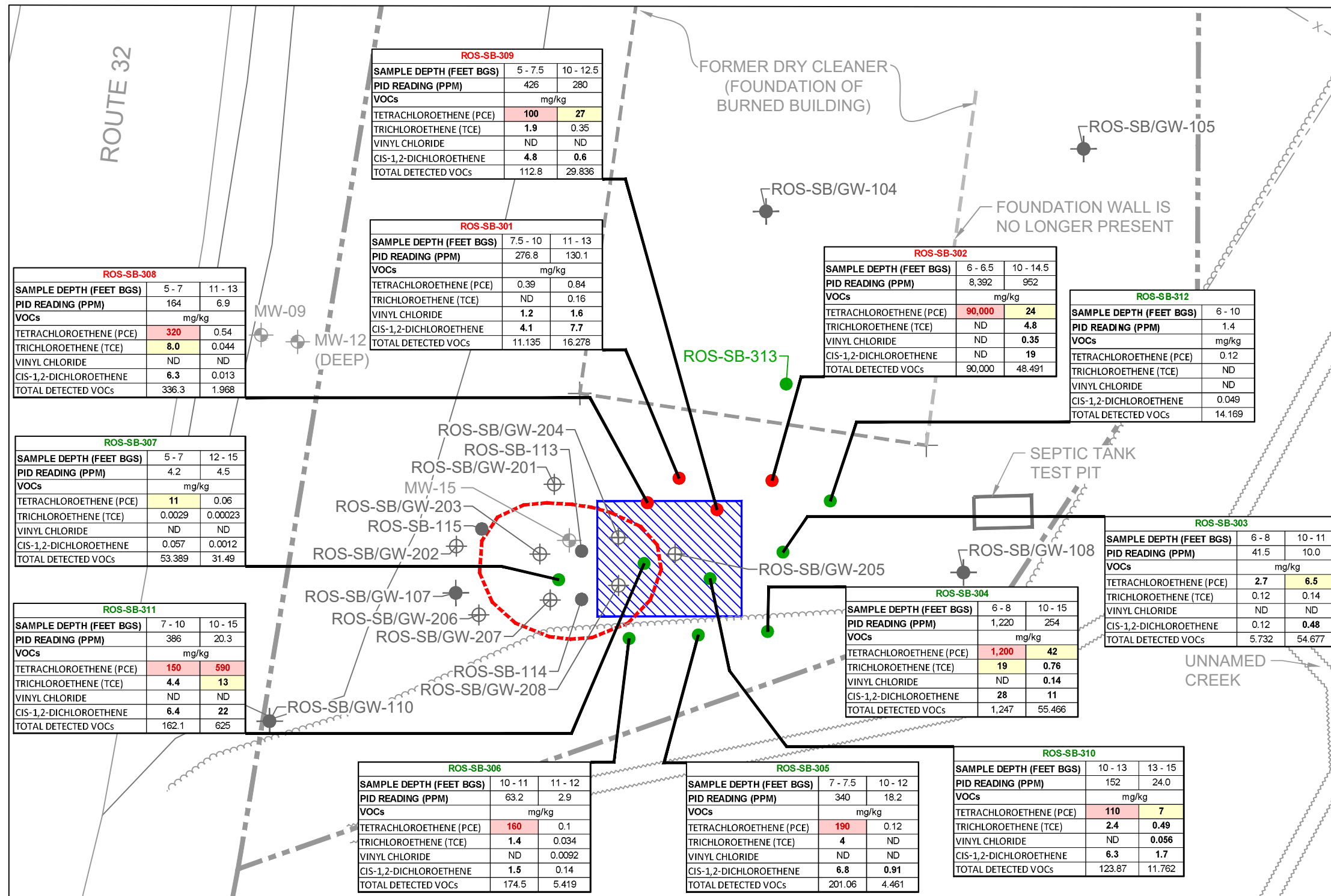
10 Maxwell Drive, Suite 200  
 Clifton Park, NY 12065  
 Phone: 518-348-1190  
 www.TRCCompanies.com  
 FILE: sitelayout.aprx







11x17 - ATTACHED XREFS: rosendale - ATTACHED IMAGES: Figure 1 - Proposed SB Locations (02). Google Earth Image, Rosendale DTG0 map.mxd; DRAWING NAME: B:\NYSDEC\009812\Work Assignments\009812-09 Rosendale Cleaners\Figures\TRC Working Drawings\Fig 12 - Select Soil Anal. Results Map (11.2020) (RC).dwg --- PLOT DATE: March 24, 2022 - 2:28PM --- LAYOUT: 11x17L



**LEGEND (SYMBOLS NOT TO SCALE):**

- CMU BLOCK WALL FOUNDATION
- Site Boundary
- MW-## GROUNDWATER MONITORING WELL (2012)
- ROS-SB/GW-1## DIRECT PUSH SOIL BORING AND "GRAB" GROUNDWATER SAMPLE (2012)
- ROS-SB-1## SOIL BORING (2013)
- ROS-SB/GW-2## SOIL BORING AND "GRAB" GROUNDWATER SAMPLE (2017)
- ROS-SB-3## DELINEATION / SOIL RE-USE SOIL BORING (2020)
- ROS-SB-3## WASTE CHARACTERIZATION SOIL BORING (2020)
- APPROXIMATE LIMITS OF BURIED DEBRIS PILE (2014)
- ~ TREE LINE / WOODED AREA
- ▨ Initial Estimated Extent of Source Area (2019)

LOCATION ID				
SAMPLE DEPTH (FEET BGS)	# - #			
PID READING (PPM)	##			
ANALYTE	UUSCO	CUSCO	UTS	LDR
VOCs				
TETRACHLOROETHENE (PCE)	1.3	150	6.0	60
TRICHLOROETHENE (TCE)	0.47	200	6.0	60
VINYL CHLORIDE	0.02	13	6.0	60
CIS-1,2-DICHLOROETHENE	0.25	500	NA	NA

<b>BOLD</b>	EXCEEDS UUSCO
<b>BOLD</b>	EXCEEDS CUSCO
<b>BOLD</b>	EXCEEDS UTS
<b>BOLD</b>	EXCEEDS LDR



**ACRONYMS:**

- CVOCs - CHLORINATED VOLATILE ORGANIC COMPOUNDS.
- FEET BGS - FEET BELOW GROUND SURFACE.
- mg/kg - MILLIGRAMS PER KILOGRAM.
- ND - NOT DETECTED ABOVE THE LABORATORY QUANTITATION LIMIT.
- PID - PHOTO-IONIZATION DETECTOR.
- PPM - PARTS PER MILLION.
- TCL - TARGET COMPOUND LIST
- TICs - TENTATIVELY IDENTIFIED COMPOUNDS.
- VOCs - VOLATILE ORGANIC COMPOUNDS.
- UUSCO - 6 NYCRR PART 375 UNRESTRICTED USE SOIL CLEANUP OBJECTIVE.
- CUSCO - 6 NYCRR PART 375 COMMERCIAL USE SOIL CLEANUP OBJECTIVE.
- UTS - USEPA 40 CFR § 268.48 UNIVERSAL TREATMENT STANDARD: NONWASTEWATER STANDARD.
- LDR - USEPA 40 CFR § 268.49 ALTERNATIVE LAND DISPOSAL RESTRICTION TREATMENT STANDARD FOR CONTAMINATED SOIL.

**NOTES:**

- LOCATIONS AND DIMENSIONS OF PHYSICAL FEATURES AND PROPERTY BOUNDARIES ARE APPROXIMATE.
- SOIL SAMPLES WERE SUBMITTED FOR LABORATORY ANALYSIS OF TCL VOCs + 10 TICs.
- ONLY SELECT CVOCs AND TOTAL DETECTED VOC CONCENTRATIONS (INCLUDING TICs) ARE SHOWN.
- LABORATORY ANALYTICAL DATA QUALIFIERS HAVE BEEN OMITTED. REFER TO THE DATA SUMMARY TABLES FOR QUALIFIERS.
- NO SOIL SAMPLES COLLECTED FROM ROS-SB-313 WERE SUBMITTED FOR LABORATORY ANALYSIS.

PROJECT:  
**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
 ROSENDALE CLEANERS - SITE NO. 356050  
 TOWN OF ROSENDALE, NEW YORK**

TITLE:  
**COC Soil Analytical Results  
 November (2020)**

DRAWN BY: H. DELGADO    PROJ. NO.: 403739.0000.0000  
 CHECKED BY: J. KING  
 APPROVED BY: J. MAGDA  
 DATE: MARCH 2022

**FIGURE 5**

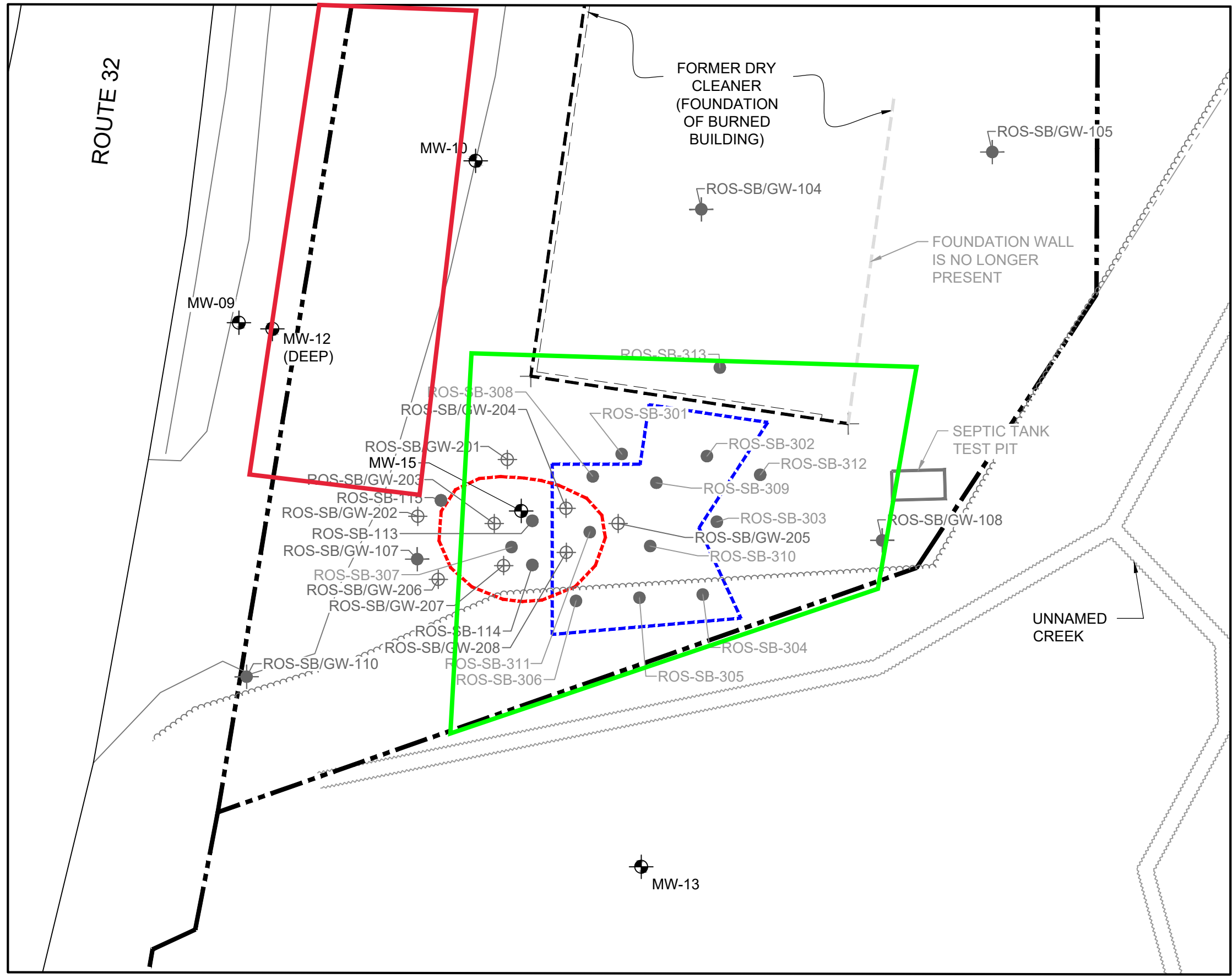
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FILE NO.: Fig 12 - Select Soil Anal. Results Map (11.2020) (RC).dwg





11x17L - I:\Projects\ISS\Rosendale Cleaners\Figures\ISS\TRC Working Drawings\Fig 7 - Conceptual ISS Plan (RC).dwg - PLOT DATE: June 14, 2022 - 2:25PM - LAYOUT: 11x17L  
 Version: 2017-03-03



**LEGEND (SYMBOLS NOT TO SCALE):**

- CMU BLOCK WALL FOUNDATION
- Site Boundary
- GROUNDWATER MONITORING WELL LOCATION AND IDENTIFICATION NUMBER (2012)  
MW-XX
- DIRECT PUSH SOIL BORING AND "GRAB" GROUNDWATER SAMPLE LOCATION AND IDENTIFICATION NUMBER (2012)  
SB/GW-1XX
- SOIL BORING LOCATION AND IDENTIFICATION NUMBER (2013 AND 2020)  
ROS-SB-XXX
- ⊕

 SOIL BORING AND "GRAB" GROUNDWATER SAMPLE LOCATION AND IDENTIFICATION NUMBER (2017)  
ROS-SB/GW-2XX
- APPROXIMATE LIMITS OF BURIED DEBRIS MOUND (2014)
- Approximate Extent of Soil Excavation and Groundwater Treatment (To be refined during design)
- Conceptual Soil Cover Area (To be refined during design)
- Contingency Groundwater Treatment Area

**NOTES:**

1. LOCATIONS AND DIMENSIONS OF PHYSICAL FEATURES AND PROPERTY BOUNDARIES ARE APPROXIMATE.



PROJECT:	
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION ROSENDALE CLEANERS SITE - SITE NO. 356050 TOWN OF ROSENDALE, NEW YORK	
TITLE:	
<b>Conceptual Excavation Plan (ALTERNATIVE 2)</b>	
DRAWN BY:	H. DELGADO
CHECKED BY:	C. LUTHER
APPROVED BY:	H. NICHOLS
DATE:	JUNE 2022
PROJ NO.:	403739.0000.0000
<b>FIGURE 7</b>	
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FILE NO.:	Fig 7 - Conceptual ISS Plan (RC).dwg