

Periodic Review Report for the Baldwin Place Shopping Center (now Somers Commons)

80 U.S. Route 6
Baldwin Place, Westchester County, New York

Covering the Time Period from February 15, 2014 through February 15, 2015

NYSDEC Site No. 3-60-023

June 18, 2015

Prepared for: NYSDEC – Central Office 625 Broadway Albany, New York 12233-7020 REMEDIATION SOLUTIONS

Environmental Consulting

DRILLING APPLICATIONS

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February 15, 2015 through February 15, 2016



Enclosure 1 Engineering Controls – Standby Consultant/Contractor Certification Form



			Site Details		Box 1	
Site	No.	360023				
Site	Name	Baldwin Place Sho	opping Center (now Somers Con	nmons)		
City Cou	/Town: E	s: 80 Route 6 Baldwin Place estchester e: 28.0	Zip Code: 10505			
Rep	orting P	eriod: February 15,	2014 to February 15, 2015			
1.	Is the in	formation above cor	rect?		YES	NO
	If NO, ir	nclude handwritten a	bove or on a separate sheet.		X	
2.			e or all of the site property been so map amendment during this Repo			X
3.	•	knowledge has therng Period (see 6NYC	e been any change of use at the si CRR 375-1.11(d)) ?	te during this		x
4.	-		y federal, state, and/or local permit or at the property during this Repor	, -		X
			estions 2 thru 4, include documen previously submitted with the			
5.	To your	knowledge is the sit	e currently undergoing developme	nt ?		X
					Box 2	
6	la tha a	urrant aita uga canair	stent with the use(s) listed below?		YES	NO
6.			mercial, and Industrial		X	
7. /	Are all IC	S/ECs in place and f	unctioning as designed?		X	
			ESTION 6 OR 7 IS NO, sign and date in the second se			
	Signatur	re of Standby Consult	ant/Contractor	Date		

Site No. 360023 Box 3 **Description of Institutional Controls** Parcel Owner Institutional Control 4.20-1-11 U.B. Somers, Inc. (c/o Urstadt Biddle Properties Monitoring Plan Inc., Greenwich, Ct.) O & M Plan A Long Term Monitoring and Operation and Maintenance Plan is in place. **Description of Engineering Controls** Box 4 Parcel **Engineering Control** 4.20-1-11 **Groundwater Treatment System** One groundwater pump and treat system (Plant 1) is currently in operation in the former source area to address residual contamination/shallow plume containment. Long term groundwater monitoring is required. Vapor monitoring is required in Unit 6 (Home Goods Store). Periodic Review Report (PRR) Certification Statements Box 5 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 certification, including data and material prepared by previous contractors for the certifying period, if any: b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete. **YES** NO X 2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true: a) the Institutional Control and/or 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 the public health and the environment: c) nothing has occurred that would constitute a failure to comply with the Site Management Plan, or equivalent if no Site Management Plan exists: YES NO Χ IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and contact the DEC PM regarding the development of a Corrective Measures Work Plan to address these issues. Signature of Standby Consultant/Contractor Date

IC/EC CERTIFICATIONS

Box 6

Qualified Environmental Professional Signature

I certify that all information in Boxes 2 through 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 Randolph H. Hoose

at Aztech Technologies, Inc.

5 McCrea Hill Road

Ballston Spa, New York 12020

am certifying as a Qualified Environmental Professional.

Kandy Hook

Signature of Qualified Environmental Professional

<u>06 - 18 - 2015</u>

Date

Aztech Technologies, Inc. CF-3

1.0 INTRODUCTION

This document is required as an element of the remedial program at the former Baldwin Place Mall, located at 80 U.S. Route 6 in the Town of Somers, Westchester County, New York (hereinafter referred to as the "Site"). The Site is managed under the New York State (NYS) Inactive Hazardous Waste Disposal Site Remedial Program administered by New York State Department of Environmental Conservation (NYSDEC). The Site, which is currently known as Somers Commons, is listed by the NYSDEC as a Class 2 Inactive Hazardous Waste Site (ID No. 3-60-023). Class 2 sites are sites where hazardous waste disposal has been confirmed and, its presence presents a significant threat to public health and the environment.

Several investigative and remedial activities have been conducted at the Site in accordance with the 1995 Record of Decision (ROD), which was executed on November 4, 1995. The Site currently operates a groundwater pump and treat (GWP&T) remedial system (Plant 1) that is located near the source area and, has operated for over 10 years. A second GWP&T remedial system (Plant 2) formerly operated at the site but, is no longer in service.

Plant 2 is the former water supply system for the mall. This water supply system was later extended to provide potable water to the Meadow Park Road residential area located southeast of the site. This residential area was disconnected from Plant 2 when the municipal water system became available in the area. Plant 2 continued to operate as a groundwater extraction and treatment system after it was disconnected from the Meadow Park Road residential area. Plant 2 ceased operation in January, 2011 and has recently been recommended for decommissioning after a September, 2014 remedial system optimization (RSO) completed by MACTEC Engineering and Consulting, P.C. of Portland Maine (MACTEC). Soil vapor intrusion (SVI) monitoring is also conducted in one retail establishment within the mall.

The NYSDEC has established the periodic review process in order to determine if a site is being managed in accordance with the remedies established for that site in its governing documents. The governing documents for completing this PRR, and all previous monitoring and reporting, have been the original (November, 1995) ROD and, the January, 2004 Plan for Routine Groundwater Monitoring for the Baldwin Place Mall (by Lawler, Matusky & Skelly Engineers, LLP). The November, 1995 ROD established remedial goals for the site; the January, 2004 Plan for Routine Groundwater Monitoring established procedures for sampling on-site groundwater monitoring wells; remedial pumping wells; off-site groundwater monitoring wells (Meadow Park Road monitoring wells); the Lake Baldwin Water District and, private water supply wells.

NYSDEC, with the assistance of MACTEC, is currently in the process of developing a Site Management Plan (SMP) for the site. That document, once finalized, will become the governing document that will direct all future management of the site. NYSDEC anticipates

finalizing the SMP during the upcoming reporting period (February 15, 2015 through February 15, 2016).

The periodic review report (PRR) seeks to evaluate site-specific inspection, monitoring, and other related data, that will help to assess whether the remedies (engineering and/or institutional controls) for a site are being implemented properly. In particular, the PRR seeks to evaluate pertinent site-related data and evaluate whether the remedies established for the site remain protective of human health and the environment.

Aztech was issued a callout in April, 2009 (callout no. 117995) in which NYSDEC requested that they operate and maintain the two (2) water treatment systems at the site (Plant 1 and Plant 2). This included regular influent and effluent sampling and, routine maintenance of the two (2) treatment plants. As previously indicated, a recent RSO by MACTEC recommended that Plant 2 be decommissioned. Site monitoring was anticipated to be via an engineering services consultant.

2.0 SITE BACKGROUND AND HISTORY

The Site is a 28 acre parcel (consisting of parcel Nos. 4.20-1-11.2 through 4.20-1-11.9) in a mixed residential/commercial area within the Town of Somers, Westchester County, New York (**Figure 1**). The Site was a mostly vacant shopping center until the early 2000's, when it was demolished to make way for the current shopping center (Somers Commons) located on the property. The property is bounded by U.S. Route 6 to the northwest, a bike path (a former railroad embankment) to the east and, an east-west trending section of Route 118 to the north.

The Site was used for agricultural purposes (as an orchard) prior to its development into the Baldwin Place Shopping Center in 1965. A dry cleaning business is known to have operated on the premises since 1967. This business came under scrutiny in 1979 as a result of a county-wide investigation, by the Westchester County Department of Health (WCDOH), of sites vulnerable to the dry cleaning solvent tetrachloroethene (PCE). During this investigation, WCDOH identified PCE in the water supply wells associated with the shopping center but, no evidence of disposal (or source) was found. Subsequent sampling by WCDOH in 1984 confirmed that PCE was present in the shopping center water supply at concentrations that were less than the 50 part per billion (ppb) guidance value for drinking water at that time. Big V Supermarkets acquired the shopping center in 1986.

Topographically, the Site is situated in a relatively high location with drainage toward the northwest and southeast. The eastern portion of the site drains to a south flowing stream that lies between the Site and the residential properties on Meadow Park Road. This is a tributary to the nearby Muscoot River. The western portion of the Site drains to a north-flowing stream that empties into two ponds northwest of the property and Lake Baldwin prior to its confluence with the Muscoot River. The Muscoot River flows south and empties into the Amawalk Reservoir, approximately 1.5 miles south of the Site.

2.1 Previous Investigations

During the county-wide investigations conducted by WCDOH in 1979 (and subsequent investigations conducted through 1989), the presence of PCE in groundwater was confirmed. The purpose of this sampling program initiated by WCDOH was to assess potential drinking water problems in areas where present and past dry cleaning establishments had been located. The program started by collection of numerous samples from private water supply wells throughout the county. The results of that effort identified impacts to the shopping center water supply. However, no evidence of disposal by the dry-cleaning establishment was found. Nevertheless, based on confirmation of historical groundwater quality data, NYSDEC concluded that the dry-cleaner was the most likely source of the impacts identified. As such, the Site was listed on the Registry of Inactive Hazardous Waste Sites in New York State as a Class 2 site with the groundwater impacts determined to be a significant threat to public health.

A groundwater investigation was conducted in May, 1989 and, a Water Supply and Treatment Alternatives Study was conducted later that year in October, 1989. A Remedial

Investigation/Feasibility Study (RI/FS) was concluded in 1995 and led to issuance of a Record of Decision (ROD) for the Site. A site map depicting the Baldwin Place Shopping Center, prior to it's raze and rebuild in the early 2000's, is presented as **Figure 2**.

2.1.1 Site Geology/Hydrogeology

The RI found that the Site and vicinity is underlain by glacial till, weathered bedrock, and bedrock. The till comprises the uppermost geologic and water bearing unit. The till is thin near the western/north-western site boundaries and thickens to the south-southeast. Below the glacial till is approximately 15 to 30 feet of weathered bedrock that grades from highly weathered to competent. The depth to competent bedrock ranges from 35 feet below grade (in the western part of the Site) to about 100 feet (in the east/southeastern part of the Site). The unweathered bedrock is characterized as biotite gneiss.

The weathered and unweathered bedrock is under "unconfined" conditions in the extreme western and northwestern portion of the Site. In this area, the overlying glacial till is thin and mostly unsaturated. The glacial till thickens and, becomes saturated throughout the main portion of the Site. The occurrence of shallow groundwater beneath the site generally ranges from 2.0 feet to 7.0 feet below grade. Regional groundwater flow in the off-site area to the northeast is generally in a southwesterly direction toward the Site. However, the presence of an apparent groundwater divide (trending in a south-southwesterly/north-northeasterly direction) beneath the southern portion of the Site diverts groundwater movement toward the south and southeast (in the area southeast of the divide) and, toward the northwest (in the area northwest of the divide). This divide persists under pumping conditions relating to "Plant 2", the former water supply for the shopping center. Within the deeper bedrock zone, regional groundwater flow also indicates a groundwater divide under static conditions with flow components toward the southeast on the southeast side of the divide, and toward the west/northwest on the northwest side of the divide. Additionally, where saturated glacial till overlies weathered/unweathered bedrock, a downward vertical gradient is evident between these two units.

2.1.2 Source Area

The RI included a test boring program that was conducted within an alleyway area behind the dry cleaning establishment. The analytical results of the soil sampling associated with this effort identified a 15 foot by 15 foot area of elevated PCE concentration within the unsaturated zone above the water table (approximately 3.0 feet below grade at this location). The maximum depth of the PCE impacted soil extended to approximately 15 feet below grade. Groundwater sampling within this area identified PCE concentrations as high as 24,000 micrograms per liter (ug/l). As such, this area, which is shown on Figure 2, was determined to be the source for the PCE concentrations identified in on-site and nearby off-site groundwater, and, within the water supply wells for the former shopping center.

2.1.3 Groundwater

The dry cleaning compound PCE and its related degradation by-products trichloroethene (TCE), and 1,2-dichloroethene (DCE) are the compounds of concern at this site. Groundwater within the source area has historically contained PCE concentrations as high as 24,000 ug/l. The location of the source area in relation to the aforementioned groundwater divide has caused site related compounds to migrate toward the southeast and, to the west. Historic PCE concentrations identified in on-site groundwater outside of the source area have been detected as high as 910 ug/l and, TCE and DCE have been identified as high as 190 ug/l and 61 ug/l, respectively.

Toward the southeast, where a strong downward vertical component of groundwater flow is present, the lateral distribution of site related compounds is limited. This is because groundwater flow is preferentially in a downward direction, ultimately recharging the underlying weathered and unweathered bedrock. Movement of site—related compounds within the weathered and unweathered bedrock has migrated toward an off-site residential area to the southwest. This area, which is approximately 1,200 feet from the source area, is known as the Meadow Park Road Area.

Toward the west and northwest, the downward vertical gradient between the glacial till and weathered bedrock/unweathered bedrock is not as strong. As such, the weaker vertical gradient allows impacted groundwater to move farther laterally, while also moving deeper vertically into the weathered/unweathered bedrock. This area, which is also approximately 1,200 feet from the source area, is a mixed commercial and residential area known as the Route 6 Area.

2.1.3.1 Former Water Supply Wells – Meadow Park Road Area

The Meadow Park Road Area is located southeast of the Site and extends as far as the southernmost intersection between Meadow Park Road and Tomahawk Street (Route 118). Several former water supply wells in this area have had detections of site-related VOCs (PCE, TCE and/or DCE) in excess of NYSDEC standards/guidance values for class GA groundwater as defined by NYSDEC in their Technical and Operational Guidance Series Memorandum (TOGS 1.1.1) of June, 1998. Seven (7) of these residential water supplies (when they were active) were equipped with point of entry treatment (POET) systems. The POET systems used granular activated carbon (GAC) as a media to remove site-related VOCs from the water supply prior to its use. Residences in this area are now connected to the regional municipal water system.

2.1.3.2 Water Supply Wells – Route 6 Area

The Route 6 Area is located west and northwest of the Site and extends as far to the west as Mahopac Avenue. Several former commercial and residential water supply wells in this area have had detections of site-related VOCs (PCE, TCE and/or DCE), as well as MtBE (methyl tertiary butyl ether - from a nearby gasoline release), in excess of the NYSDEC

standards/guidance values (TOGS 1.1.1). Three (3) water supplies for commercial businesses along Route 6 were equipped with POET systems based on impacts with site-related VOCs (PCE/TCE/DCE) while POET systems were installed on five (5) commercial and residential water supplies on US Route 6 and Kennard Road to address gasoline-related MtBE impacts. The regional municipal water system now supplies these locations.

2.2 Record of Decision and Remedial Actions

Big V Supermarkets entered into an Order on Consent with NYSDEC in September, 1991 where they either installed new POET systems or, assumed maintenance and operation of existing POET systems for the water supplies of commercial and/or residential properties impacted with site-related VOCs. This was part of an Interim Remedial Measure undertaken prior to issuance of the November, 1995 Record of Decision (ROD).

2.2.1 Record of Decision

The Groundwater Investigation and Water Supply and Treatment Alternatives Studies conducted in 1989 and, the RI/FS concluded in 1994 led to issuance of the ROD in November, 1995. The goals of the ROD were to:

- Prevent exposure (via inhalation, ingestion, and dermal contact) to soils containing unacceptable levels of PCE and its breakdown products;
- Prevent continued degradation of groundwater quality through migration of PCE and its breakdown products from impacted soil to groundwater;
- Prevent exposure (via inhalation, ingestion, and dermal contact) to groundwater impacted with unacceptable concentrations of PCE and its breakdown products;
- Restore groundwater quality (impacted by PCE and its breakdown products) to acceptable concentrations within a reasonable time frame; and,
- Prevent migration and discharge of site-related VOCs in groundwater to adjacent surface water bodies.

Therefore, the following elements were included in the ROD in order to satisfy its goals:

- Source removal via excavation of source area soil;
- Supply potable water to 19 residences on Meadow Park Road. This would be accomplished either by developing a new water district that derives its water supply via the two (2) water supply wells associated with the shopping center and treating that water via granular activated carbon (GAC) prior to distribution to the 19 residences or; continue maintenance and operation of the 19 individual POET systems on Meadow Park Road until such time that the Town of Somers extends the regional municipal water system into that area. Under the former option, Big V would operate the shopping center wells as a pump and treat groundwater remedial system;
- Maintain POET systems along US Route 6. This would be accomplished by continuing maintenance and operation of individual POET systems installed on commercial and/or residential properties located along US Route 6. Use of these POET systems would

continue until groundwater quality is restored to drinking water standards or, an alternate source of water supply becomes available. Additionally, any additional wells along Route 6 that became impacted by site-related VOCs in excess of drinking water standards would be equipped with a POET system;

- Connection to alternate water supply. Each of the residences and/or commercial establishments equipped with POET systems would be connected to the regional municipal system when it became available; and,
- Groundwater treatment in the source area. A groundwater pump and treat system (Plant-1) would be installed in proximity to the source area in order to capture vertical and horizontal flow from within and around the source area as well as to capture vertical leakage from the glacial till into the bedrock. Groundwater captured via this system would be treated via a separate treatment system and, be discharged to a nearby stream.

2.2.2 Remedial Actions

Big V Supermarkets assumed responsibility for implementing remedial actions required by the ROD until August 6, 2003, when liquidation of their assets under a bankruptcy proceeding terminated their funding of remedial efforts. NYSDEC has assumed direct responsibility for the continued implementation of the ROD since that time.

2.2.2.1 Source Removal

The purpose of this step was to remove approximately 135 cubic yards of source area soil from the area located behind (east) of the former dry cleaning operation. Note that the strip mall building that was the location of the former dry cleaning operation has since been razed. The former source area (shown on **Figure 3**), is located on the current site map for the Somers Commons shopping center. The excavation, which was completed in February 1997, entailed removal of the shallow soil above the footers of the former building foundation. Sheet piling was installed to form the walls of the remainder of the excavation. Altogether, 236 tons of impacted soil was removed. The former source area is currently presented as a lawn area on the north side of the Home Goods store.

2.2.2.2 Potable Water Supply - Meadow Park Road

The community water supply system was constructed in 1998 and started up during February 1999. This system delivered treated water obtained via the shopping center water supply to 17 of the 19 residences located on Meadow Park Road. These 17 residences in the Meadow Park Road Area have since been connected to the regional municipal water system when it became available in November, 2001. As such, the connection between the Site's former water supply and Meadow Park Road has since been terminated. The Sites former water supply wells continued operation as a groundwater pump and treat system (Plant 2). Plant 2 was recommended for decommissioning in a recent RSO conducted by MACTEC for the NYSDEC.

The individual supply wells serving the two (2) residences that were not connected into the municipal water system in November, 2001 were sampled quarterly until 2003, with annual sampling in 2004, 2006, and 2007. Analytical results indicate that these wells have not been impacted by VOCs related to the Site, and those wells are no longer routinely sampled.

2.2.2.3 Maintain POET Systems Along Route 6

Big V maintained the POET systems at these residential and/or commercial properties until they were connected to the municipal system. In November 2001, several residences on Mahopac Avenue that had POET systems (and one additional residence that did not have a POET system) were connected by Big V to the municipal system. During May and June 2002, commercial properties that had POET systems on US Route 6 were connected by Big V to the municipal system. Additional connections to the municipal system continued through 2003.

2.2.2.4 Connection to Alternate Water Supply

As indicated in Section 8.4 of the ROD, both Big V Supermarkets and the NYSDEC agreed that connection to a permanent regional water supply system (when available) would be the selected water supply option in the long term. As such, connections to the municipal system in the area have been ongoing.

2.3 Engineering/Institutional Controls

The November, 1995 ROD imposed Engineering Controls for the site that initially included operation and maintenance of POET systems on residential and commercial water supply wells and/or development of a new water district (using the supply wells for the shopping center) until the regional municipal system would be available in the area. Engineering controls also included groundwater extraction and treatment via two (2) separate remedial systems (Plant 1 and Plant 2). Institutional controls include groundwater monitoring (via various monitoring wells, former off-site water supply wells and current water supply wells) and soil vapor intrusion (SVI) monitoring of Building 6 (the Home Goods store) associated with the Somers Commons shopping center. During the years since the effective date of the ROD, operation and maintenance of individual POET systems has ceased. This is because one of the long term goals of the ROD was the connection of nearby residences and commercial establishments to the regional municipal system once it became available.

2.3.1 Groundwater Extraction and Treatment

Groundwater extraction and treatment (GWE&T) at the site has historically been via two (2) separate remedial systems. Plant 1 is located in proximity to the former source area and its purpose is to capture groundwater that becomes impacted with site related compounds via residual source area soil. Plant 2 historically treated impacted groundwater captured by the water supply wells for the former shopping center. Plant 2 is currently not operating and has been recommended for decommissioning. Plant 2 has not operated during the time period reported herein.

2.3.1.1 Plant 1

The former source area was located in the area that is currently adjacent to and north of Building 6 of the Somers Commons Shopping Center (Home Goods store). Excavation of the former source area was completed in 1997. This former source area is currently presented as a grassy lawn area. Plant -1 was constructed and brought on-line in 1998.

Groundwater extraction is via one (1) shallow well (RW-1S), which draws impacted groundwater from the shallow portion of the glacial till overburden, and one (1) deeper well that draws impacted groundwater from a deeper portion of the glacial till overburden. The purpose of these pumping wells is to extract impacted groundwater before it can migrate off-site laterally and, before it can migrate vertically and enter the underlying bedrock. These wells are completed at depths of 49-feet and 83-feet below grade, respectively.

Both of the 4.0-inch inside diameter (ID) wells are equipped with 1/3 horsepower submersible pumps that convey groundwater from the subsurface to the Plant 1 treatment building. The design flow rate for the wells is approximately a ½ gallon per minute (gpm) from well RW-1S and 3.0 gpm from well RW-2D. Each well is equipped with a totalizing flow meter. Water conveyed to the treatment plant is sequentially filtered via 50 micron and 5 micron bag filters to remove particulate then passed through two (2) adsorption units (connected in series) that each contain 165 pounds of granular activated carbon (GAC). After filtration, discharge is to an unnamed tributary on the east side of the Site that eventually discharges to the Muscoot River.

The March, 1998 Operation and Maintenance Manual for the Baldwin Place Mall Plant 1 Groundwater Pump & Treat System (prepared by Lawler, Matusky & Skelly Engineers, LLP) provides details regarding operation and maintenance procedures to be employed for this treatment facility.

2.3.1.2 Plant 2

Plant 2, originally served as the water supply source for the Baldwin Place Shopping Center. Groundwater supply was via two (2) wells. Well P-1 is a 6.0-inch diameter well that is 260 feet deep with 140 feet of steel casing. Well P-2 is also 6.0-inches in diameter but is 400 feet deep. The length of casing is unknown. Safe well yields were determined to be 45 gpm and 30 gpm, respectively. The system typically operated via well P-1, with well P-2 serving as a backup when needed.

During the period between January 1999 and November 2001, Plant 2 served the dual objective of supplying the residences along Meadow Park Road with potable water and withdrawing additional groundwater for the remediation of the Site. After November 2001, the residences along Meadow Park Road were connected to the newly extended municipal water system. As such, the connection between Plant 2 and those residences was terminated. After terminating the connection to the Meadow Park Road residences, Plant 2 would subsequently serve only as a secondary remedial system to augment groundwater extraction.

Both of the 6.0-inch ID wells are equipped with 5.0 horsepower submersible pumps that convey groundwater from the subsurface to the Plant-2 treatment building. Water conveyed to the treatment plant is first filtered via 5 micron filters to remove particulate then passed through two (2) adsorption units (connected in series) that each contain 1,600 pounds of GAC. After filtration, discharge is to an unnamed tributary on the east side of the Site that eventually discharges to the Muscoot River.

Plant 2 has not been operational during the time period reported herein (February, 2014 through February, 2015) and, was recommended for decommissioning in a recent RSO conducted on behalf of NYSDEC by MACTEC.

2.3.2 Environmental Media Monitoring

No institutional controls (such as easements or deed restrictions) were ever required by either the Order on Consent or the ROD. However, various environmental media have historically been monitored under the ROD and associated governing documents for the site. These environmental media include:

- On-site groundwater monitoring wells;
- Remedial pumping wells;
- Meadow Park Road monitoring wells;
- The Lake Baldwin Water district;
- Private potable wells, and;
- Soil Vapor Intrusion Sampling

Monitoring of these environmental media has historically been in accordance with the January, 2004 Plan for Routine Groundwater Monitoring (Monitoring Plan) prepared by Lawler, Matusky & Skelly Engineers, LLP of Pearl River, New York. Some of the monitoring requirements have been amended based on site conditions. However, NYSDEC is currently in the process of finalizing an SMP for the site with the assistance of MACTEC. That document, once finalized, will become the governing document that will direct all future management of the site. NYSDEC anticipates finalizing the SMP during the upcoming reporting period (February 15, 2015 through February 15, 2016).

2.3.2.1 On-Site Groundwater

The January, 2004 Monitoring Plan called for quarterly monitoring of groundwater samples from wells MW-5S, MW-7D and MW-12S. Wells MW-5S and MW-12S are both located in proximity to the former source area adjacent to the north side of Building 6; well MW-7D is located in the paved parking area west of Building 6. The Monitoring Plan also called for annual sampling of wells MW-4S and MW-4D (located near the northern entrance of the shopping center north of Building 5), well MW-8S (located near the northeast entrance of the shopping center), and, wells MW-9S and MW-9D (located in the paved area adjacent to Building 2 on the west side of the shopping center). A monitoring frequency of every five quarters (5/4) is proposed for these wells in the pending SMP.

Purge water from wells MW-4S, MW-4D, MW-5S and MW-8S is to be directed to adjacent grassy areas whereas purge water from all of the other on-site wells is to be treated via Plant 1 prior to discharge. Analysis is for the full list of VOCs via EPA analytical method 601 and for MtBE via analytical method 602.

2.3.2.2 Remedial Pumping Wells

The January, 2004 Monitoring Plan called for quarterly sampling of remedial wells RW-1S and RW-2D (both associated with Plant 1) and, quarterly sampling of either well P-1 or well P-2 (whichever of the two wells is actively pumping at the time), of which both are associated with Plant 2. The pending SMP proposes a monitoring frequency of every five quarters (5/4) for these wells. Analysis is for the full list of VOCs via EPA analytical method 601 and for MtBE via analytical method 602.

Plant 2 is currently not operating and, additionally, has been recommended for decommissioning in a recent (September, 2014) RSO completed by MACTEC for the NYSDEC. As such, any sampling associated with Plant 2 will no longer be required.

2.3.2.3 Meadow Park Road Monitoring Wells

The January, 2004 Monitoring Plan specifies four (4) off-site monitoring wells located in the residential area southeast of the Site on Meadow Park Road for annual sampling. They were originally used as water supplies for residences that have since been connected to the municipal water system. The wells range in depth from 190 feet below grade to 245 feet below grade. The wells are located at the following residences on Meadow Park Road:

- #6 Meadow Park Road (Sorensen Residence);
- #12 Meadow Park Road (Matthews Residence);
- #13 Meadow Park Road (Pepi Residence), and;
- #21 Meadow Park Road (Hale Residence).

Purge water associated with sampling at these locations is treated via a portable treatment system, consisting of a cartridge filter (for removal of particulate) and activated carbon (for removal of VOCs). Use of this system without the need for permits has been authorized by the NYSDEC Regional Hazardous Waste Engineer. Treated water from #6 and #12 Meadow Park Road is discharged to the drainage ditch on Route 118 (Miller Road) while treated purge water from #13 and #21 Meadow Park Road is discharged toward the back of those properties. Analysis is for the full list of VOCs via EPA analytical method 601 and for MtBE via analytical method 602.

The pending SMP does not include a monitoring schedule for these wells. As such, the Meadow Park Road monitoring wells will not be included in future monitoring events.

2.3.2.4 Lake Baldwin Water District

The January, 2004 Monitoring Plan specifies a December, 2001 Preliminary Design Report for

VOC Removal at Lake Baldwin Water District as the governing document for monitoring the Lake Baldwin Water District (LBWD). However, monitoring of the LBWD is no longer a requirement of the monitoring program associated with the Baldwin Place Mall. This is because site related compounds (PCE, TCE and DCE) had not been identified in the LBWD wells for five (5) consecutive years preceding July, 2009. Removal of the LBWD from future routine monitoring was conveyed to the Carmel Town Engineer (Mr. Jack Karrell) in a July 9, 2009 letter from Ms. Janet Brown, P.E. of the NYSDEC Division of Environmental Remediation (Region 3).

2.3.2.5 Private Potable Wells

The January, 2004 Monitoring Plan identified 16 residential and/or commercial water supply wells located in proximity to the site on Mahopac Avenue, US Route 6, County Line Drive and Meadow Park Road to be included in a quarterly monitoring program. On a case by case basis, NYSDEC could modify the sampling program based on the historic analytical results at any particular location. Additionally, residences/establishments that connected to the municipal water supply were to be eliminated from the sampling program.

A communication with the Town of Somers Water Department confirms that 15 of the original 16 residences and/or businesses in this area have been connected to the regional municipal water system. One residence, located at 264 Mahopac Avenue, has elected to remain disconnected from the municipal system (which is available to this location). The pending SMP does not include a monitoring schedule for this well. As such, the private water supply well at 264 Mahopac Avenue will not be included in future monitoring events.

2.3.2.6 Soil Vapor Intrusion Monitoring

Soil Vapor Intrusion (SVI) monitoring is currently governed by a June 2008 report entitled Report on Sub-Slab Vapor Investigation by Henningson, Durham & Richardson Architecture and Engineering, P.C. (HDR – f.k.a. Lawler, Matusky and Skelly, LLC) of Pearl River, New York. This monitoring program was preceded by a site-wide soil gas investigation in 2007 that identified two buildings on the property (Building 5 and Building 6) where a subsequent SVI study was warranted. The subsequent SVI study (which included sub-slab vapor, indoor air and outdoor air sampling locations in proximity to the former source area) recommended annual SVI sampling at the "Home Goods" store located in Building 6. As such, the current SVI monitoring program for the site involves annual sampling of sub-slab vapor and indoor air associated with the Home Goods store only. The pending SMP proposes a frequency of every three (3) years for SVI monitoring.

3.0 REMEDY COMPLIANCE, PERFORMANCE, EFFECTIVENESS AND PROTECTIVENESS

The Site is located at 80 US Route 6 in the Town of Somers, Westchester County, New York. The site is currently known as the Somers Commons Shopping Plaza and consists of approximately 28 acres (Town of Somers Tax Parcel 4.20-1-11) in postal zone 10589. The property is owned by UB Somers, Inc. of Greenwich, Connecticut. In 2011, a bank was constructed on a portion of the property that was previously occupied by a gasoline station. A local Building Permit and Certificate of Occupancy (C.O.) was issued by the Town of Somers for the bank construction. During the reporting period herein, the property on which the site is situated was not sold, subdivided, merged nor did it undergo a tax map amendment. The site was not issued any federal, state, and/or local permits.

The November, 1995 ROD imposed engineering controls and monitoring of various environmental media for the site. The current monitoring program for the site is summarized in **Table 1** below. Table 1 also includes the monitoring program as modified by the pending SMP. Once finalized, the SMP will become the governing document for the site. The ROD and monitoring program for the site do not place any restrictions on the current or future use of the property. However, a deed restriction that limits future use of the property is currently being prepared by NYSDEC.

Table 1						
Monitoring Program						
Monitoring		Current	SMP		Analysis	
Program	Frequency*	Matrix	Frequency*	Matrix	Milalysis	
GWP&T – Plant 1	Monthly	Groundwater (Influent, Mid-Carbon, Effluent)	Monthly	Groundwater (Effluent Only)	VOCs (Full List) via 601 and MtBE via 602	
GWP&T – Plant 2	Monthly	Groundwater (Influent, Mid-Carbon, Effluent)	NA	NA	NA	
	Quarterly	Groundwater (MW-5S, MW-7D, and MW-12S	5/4	Groundwater (MW-5S, MW-7D, and MW-12S	VOCs (Full List) via 601 and MtBE via 602	
On-Site Groundwater	Annual	Groundwater (MW-4S, MW-4D, MW-8S, MW-9S, MW-9D)	5/4	Groundwater (MW-4S, MW-4D, MW-8S, MW-9S, MW-9D)	VOCs (Full List) via 601 and MtBE via 602	
	Not Included	Groundwater (MW-2S, MW-2D, MW- 3D, MW-3DD, MW-7S, MW-10D)	5/4	Groundwater (MW-2S, MW-2D, MW- 3D, MW-3DD, MW-7S, MW-10D)	VOCs (Full List) via 601 and MtBE via 602	
Remedial Pumping Wells	Quarterly	Groundwater (RW-1S, RW-2D, P-1** or P-2**)	5/4	Groundwater (RW-1S & RW-2D)	VOCs (Full List) via 601 and MtBE via 602	
Meadow Park Road Monitoring Wells	Annual	Groundwater • #6 MPR (Sorensen); • #12 MPR (Matthews); • #13 MPR (Pepi); • #21 MPR (Hale)	Not Included	Groundwater • #6 MPR (Sorensen); • #12 MPR (Matthews); • #13 MPR (Pepi); • #21 MPR (Hale)	VOCs (Full List) via 601 and MtBE via 602	
Private Potable Wells	Quarterly	Groundwater • #264 Mahopac Ave	Not Included	Groundwater • #264 Mahopac Ave	VOCs (Full List) via 502.2	
Soil Vapor Intrusion	Annual	Soil Vapor/Air (Sub-Slab Vapor, Indoor Air, Outdoor Air – Home Goods @ Building #6)	5/4	Soil Vapor/Air (Sub-Slab Vapor, Indoor Air, Outdoor Air – Home Goods @ Building #6)	VOCs (Full List) via TO-15	

Notes:

^{*} The frequency of events will be conducted as specified until otherwise approved by NYSDEC.

^{**} Well P-1 is Primary well; well P-2 is secondary well. Sampling from whichever well is active

The current monitoring program is directed by the ROD and other guiding documents

The Site Management Plan (SMP), once approved, will be the document guiding all future site monitoring.

NA – Plant 2: Plant 2 to be decommissioned in accordance with September, 2014 RSO by MACTEC

This PRR will evaluate each component of the monitoring program as directed by the pending SMP (outlined above in Table 1) in terms of its compliance, performance and, effectiveness and protectiveness with respect to the goals of the ROD.

3.1 Groundwater Extraction and Treatment Systems – Plant 1 & Plant 2

One of the goals of the ROD was to prevent continued degradation of groundwater quality through transfer of PCE and its breakdown products from impacted soil to groundwater. This was partially accomplished via a limited excavation of source area soil. Subsequent to completing the source area excavation, Plant 1 was installed in order to capture vertical and horizontal flow from within and around the source area as well as to capture vertical leakage from the glacial till before it enters the bedrock; Plant 2 was installed originally as the water supply for the former Baldwin Place shopping center.

Only Plant 1 was operating during the time period reported herein (February, 2014 through February, 2015). Plant 2 was not operational during the time period reported herein and was recommended for decommissioning in a September, 2014 RSO by MACTEC. Electrical service to Plant 2 has been disconnected.

3.1.1 Compliance

The monitoring schedule for Plant 1 includes monthly operation and maintenance (O&M) visits to check its operation and, to perform routine maintenance tasks (such as changing filters, making minor adjustments, etc...) as necessary. Monthly visits also include sampling of the system effluent to ensure that the treated groundwater meets the quality standards established for the site. Additional samples of extracted groundwater (system influent) and between carbon are collected in order to evaluate the effectiveness of the GAC units.

At the present time, monthly site visits to Plant 1 are routinely conducted with sampling and routine O&M completed. Additionally, the analytical results of the system effluent samples indicate that VOCs are consistently not detected in the treated water discharged from the system. As such, the discharge from Plant 1 is in compliance with the quality standards established for the site and, the operation of Plant 1 is in compliance with the ROD.

Operation of Plant 2 has been permanently terminated and, the electrical service has been disconnected. This is consistent with recommendations made by MACTEC in their September, 2014 RSO prepared for the NYSDEC.

3.1.2 Performance

Monthly site visits (Plant 1) conducted during the period between February, 2014 and February, 2015 have indicated that control upgrades, which include installation of a programmable logic controller (PLC) and new water level transducers in wells RW-1S and RW-2D, have improved the operation and performance of Plant 1. This is demonstrated by making a simple comparison

between the number of hours that each well was actively pumping groundwater for time periods of a similar duration both before and after the control upgrades were made in February, 2014. In particular, historic system operational data for well RW-2D indicates that prior to implementing the control upgrades, well RW-2D was actively pumping for a total of 577 hours during the 376 day time period between February 7, 2013 and February 18, 2014. During that time period, a total of 112,880 gallons of groundwater were extracted via this well. After completing the control upgrades, well RW-2D actively pumped groundwater for a total of 2,804 hours during the 352 day time period between February 18, 2014 and February 5, 2015. During that time period, a total of 300,320 gallons of groundwater were extracted from this well. This represents an approximate 265-percent increase in the volume of impacted groundwater extracted via well RW-2D.

3.1.3 Effectiveness and Protectiveness

An evaluation of the analytical results obtained via analysis of the system influent, mid-carbon and effluent samples collected from Plant 1 indicates that the treatment and discharge of groundwater captured by Plant 1 is effective and protective of human health and the environment. This is because the GAC treatment effectively removes the site-related VOCs present in the groundwater extracted via wells RW-1S and RW-2D prior to its discharge into the unnamed stream adjacent to the eastern side of the Site.

3.2 On-Site Groundwater & Remedial Pumping Wells

The on-site groundwater monitoring program, as modified by the pending SMP, includes sampling of 14 on-site monitoring wells and recovery wells RW-1S and RW-2D every five quarters (5/4). There were no groundwater monitoring events conducted during the time period reported herein. The next groundwater monitoring event for the site is scheduled for the 2^{nd} quarter, 2015

3.3 Meadow Park Road Monitoring Wells

The Meadow Park Road monitoring wells have been removed from the groundwater monitoring program proposed in the pending SMP. This is because these residences have been connected into the municipal water system. No further sampling of the Meadow Park Road monitoring wells is scheduled.

3.4 Private Water Supply Well – 264 Mahopac Avenue

The private water supply well at 264 Mahopac Avenue has been removed from the monitoring program proposed in the pending SMP. This is because historic water supply samples collected from this location dating back to March, 2000 have not exceeded the NYSDEC standards for class GA groundwater and, as such, are meeting the remedial goals established by the November, 1995 ROD. No further sampling of the water supply well at 264 Mahopac Avenue is scheduled.

3.5 Soil Vapor Intrusion Monitoring

The SVI monitoring program, as modified by the pending SMP, includes SVI sampling of sub-slab vapor, indoor air and outdoor air associated with the "Home Goods" store (Building 6) every three (3) years. The Home Goods store is located adjacent to (and south of) the former source area. SVI monitoring was not conducted at the site during the time period reported herein. The next SVI monitoring event for the site is scheduled for the 1st quarter, 2017.

4.0 EVALUATION OF COSTS

The cost evaluation included herein summarizes NYSDEC expenditures over the 12 month period between February, 2042 and January, 2015. The costs are broken down into five (5) categories. These include:

- System Operation and Maintenance. This includes routine monthly site visits, non-routine maintenance visits and, analytical costs via Adirondack Environmental Services, Inc. (Adirondack). The costs indicated below are associated with operation of Plant 1.
- GW Monitoring. This includes labor, materials and miscellaneous costs associated with sampling of on-site groundwater. Analytical costs via Adirondack are also included. The frequency of groundwater monitoring recommended by the pending SMP was revised to every five quarters (5/4). As such, there were no costs associated with groundwater monitoring during the time period reported herein.
- SVI Monitoring. This includes labor, materials and miscellaneous costs associated with SVI sampling. Analytical costs are directly billed to NYSDEC via the contract laboratory (Test America). The frequency of groundwater monitoring recommended by the pending SMP was revised to every three (3) years. As such, there were only nominal costs associated with this category since SVI sampling was not conducted during the time period reported herein.
- Utilities. This includes electrical costs for operation of Plant 1. Electrical costs for Plant 2 are also included. However, these costs are minimal as Plant 2 has not been operational during this time period. Additionally, electrical service to Plant 2 was discontinued in May, 2014.
- Other. This includes labor costs for unforeseen site visits, reporting and meetings.

4.1 Approximate Costs: February, 2014 through January, 2015

The approximate costs associated with the time period between February, 2014 and January, 2015 are presented in **Table 2** below.

Table 2			
Approximate Costs: February, 2014 through January, 2015			
Task	Approximate Cost		
System Operation & Maintenance	\$17,800.00		
Groundwater Monitoring	\$0.00		
Soil Vapor Intrusion Monitoring	\$150.00		
Utilities	\$3,000.00		
Other	\$16,075.00		
Total:	\$37,025.00		

4.2 Anticipated Costs: O & M and Environmental Monitoring for Next Reporting Period

The costs anticipated for the next reporting period (February 15, 2015 through February 15, 2016) are based on environmental monitoring plan outlined in the pending SMP. The various elements of the environmental monitoring plan for the site are as follows:

• GWE&T System – Plant 1: Monthly routine operation and maintenance site visits with monthly sampling.

- 5/4 Groundwater Monitoring: Sampling of 14 monitoring wells and two (2) groundwater recovery wells. 5/4 groundwater monitoring is scheduled for the 2nd quarter (April/May/June) of 2015 via low flow methods.
- SVI Monitoring: Sampling of sub-slab vapor and indoor air at two (2) locations within Building 6 (Home Goods store) of the Somers Common shopping center and, outdoor air at one (1) location is to be conducted every three (3) years. The next SVI monitoring event is scheduled for the 1st quarter, 2017 during the heating season.

The estimated costs associated with implementing the operation and maintenance of Plant 1 and, the environmental monitoring program for the next reporting period (February 15, 2015 through February 15, 2016) are summarized below in **Table 3**.

Table 3				
Estimated Costs – Operation & Maintenance and Environmental Monitoring				
February 15, 2015 through February 15, 2016				
Task	Estimated Cost	Estimated Cost – Next Reporting Period		
Task	(per event)			
GWE&T System O&M – Plant 1				
Labor	\$1,000.00			
Equipment/Materials	\$500.00	\$23,400.00		
Utilities	\$275.00			
Analytical	\$175.00			
GWE&T System – Plant 1 Total:	\$1,950.00 (per month)	(12 events)		
5/4 GW Monitoring – On-Site Wells				
Labor	\$2,650.00			
Equipment/Materials	\$3,750.00	\$7,075.00		
Analytical	\$675.00			
5/4 GW Monitoring – On-Site Wells Total:	\$7,075.00 (per event)	(1 event)		
SVI Monitoring – Home Goods Store – Every 3 Years				
Labor	\$785.00			
Equipment/Materials	\$500.00	\$0.00		
Analytical ⁺	\$1,250.00			
SVI Monitoring – Home Goods Store :	\$2,535.00 (per event)	(No Event Scheduled)		
Reporting:				
Monthly Report	\$775.00 (per report)	\$9,300.00		
Periodic Review Report (Annual)	\$2,650.00 (per report)	\$2,650.00		
Note:				
+ Estimated cost for 5 samples – Actual costs are direct billed to NYSDEC via Test America.				

Based on the costs and assumptions presented herein, the estimated cost for the upcoming reporting period (February 15, 2015 through February 15, 2016) is \$42,425.00 (using the existing contract rates for 2014). This cost does not include any currently unforeseen tasks associated with non-routine maintenance and/or repairs to GWE&T Plant 1, or decommissioning of Plant 2.

5.0 SUMMARY/CONCLUSIONS

The periodic review process is undertaken in order to determine if a site is being managed in accordance with the remedies established in its governing documents. In particular, the periodic review report seeks to evaluate pertinent site-specific inspection, monitoring, and other related data, that will help to assess whether the remedies (engineering and/or institutional controls) for a site are being implemented properly and, if those remedies remain protective of human health and the environment.

- The November, 1995 ROD imposed Engineering Controls for the site that initially included operation and maintenance of POET systems on residential and commercial water supply wells and/or development of a new water district (using the supply wells for the shopping center) until the regional municipal system would be available in the area. Engineering controls also included groundwater extraction and treatment via two (2) separate GWE&T remedial systems (Plant 1 and Plant 2).
- Institutional controls imposed by the November, 1995 ROD include groundwater monitoring via various monitoring wells, former off-site water supply wells and current water supply wells.
- Annual SVI monitoring at a commercial establishment in proximity to the former source area (Home Goods store) would be a requirement added to the monitoring program for the site in 2008.
- The ROD and monitoring program for the site do not place any restrictions on the current or future use of the property. However, the NYSDEC is currently preparing a deed restriction that limits future use of the property.
- During the years since the effective date of the ROD, operation and maintenance of individual POET systems has ceased. This is because one of the long term goals of the ROD was the connection of nearby residences and commercial establishments to the regional municipal system once it became available.
- The ROD identified PCE and its degradation by-products as the primary site-related compounds of concern.
- A source area excavation conducted at the site in February, 1997 included removal of approximately 135 cubic yards of source area soil from the area located behind (east) of the former dry cleaning operation. Altogether, 236 tons of impacted soil was removed.
 The former source area is currently presented as a lawn area on the north side of the Home Goods store.
- The current monitoring program for the site is governed by the January, 2004 Plan for Routine Groundwater Monitoring prepared by Lawler, Matusky & Skelly Engineers, LLP of Pearl River, New York; SVI monitoring is governed by a June 2008 report entitled Report on Sub-Slab Vapor Investigation by HDR (f.k.a. Lawler, Matusky and Skelly, LLC).

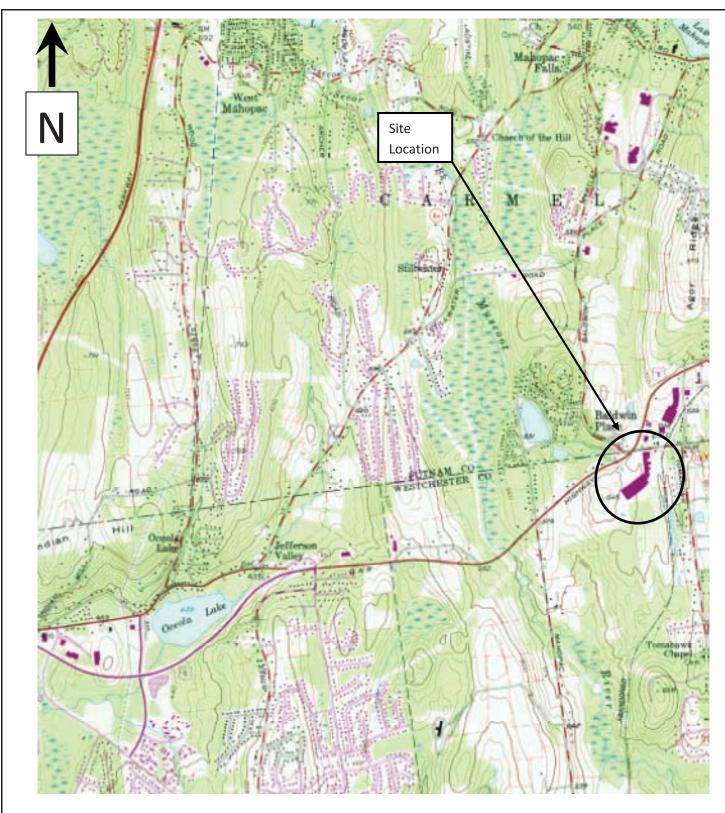
However, this PRR compares the monitoring performed during the time period reported herein to the monitoring program outlined in the pending SMP in terms of its compliance, performance, effectiveness and protectiveness with respect to the goals of the ROD.

- Engineering Controls for the site include GWE&T via two (2) treatment facilities. Plant 1 addresses impacted groundwater in proximity to the former source area and Plant 2 was the original water supply for the former Baldwin Place Mall. Plant 2 was recommended for decommissioning in a September, 2014 RSO prepared for the NYSDEC by MACTEC; it is not currently operating.
- Monthly operation and maintenance site visits indicate that control upgrades (including installation of a PLC and new liquid level transducers in wells RW-1S and RW-2D) have improved the operation and performance of Plant 1.
- An evaluation of the analytical results obtained via analysis of the system influent, midcarbon and effluent samples indicates that the treated groundwater discharged from Plant 1 is in compliance with the quality standards established for the site; is protective of human health and the environment and, as such, the operation of Plant 1 is in compliance with the ROD.
- The monitoring program for the site, as outlined in the pending SMP, includes routine sampling of various media. This includes: sampling of on-site groundwater via 14 monitoring wells (MW-2S, MW-2D, MW-2D, MW-3DD, MW-4S, MW-4D, MW-5S, MW-7S, MW-7D, MW-8S, MW-9S, MW-9D, MW-10D, MW-12S) and two (2) active groundwater recovery wells (RW-1S and RW-2D) every five (5) quarters and, SVI monitoring in Building 6 (Home Goods store) of the current Somers Commons shopping center every three (3) years.
- There were no groundwater monitoring events conducted during the time period reported herein. The next groundwater monitoring event for the site is scheduled for the 2nd quarter, 2015
- SVI monitoring was not conducted at the site during the time period reported herein.
 The next SVI monitoring event for the site is scheduled for the 1st quarter, 2017.

6.0 RECOMMENDATIONS

- The pending SMP should be finalized and implemented as the controlling document that governs environmental monitoring for the site.
- GWE&T Plant 1 should continue to be operated for the purpose of capturing groundwater flowing through (and impacted by) residual source area soil before it can enter deeper into the glacial till and bedrock systems. Monthly site visits to conduct routine maintenance and collection of GWE&T system influent, mid-carbon and effluent samples should continue until operation of Plant 1 is no longer necessary.
- A September, 2014 RSO conducted by MACTEC recommends that Plant 2 be decommissioned. Aztech concurs with that recommendation.
- The monitoring program for on-site groundwater, as outlined in the pending SMP, should continue with the next 5/4 sampling event scheduled for the spring (April/May/June) quarter, 2015.
- The SVI monitoring program for the site, as outlined in the pending SMP, includes subslab and indoor air samples collected on an annual basis at two locations within Building 6 (Home Goods store) of the Somers Common shopping center and, one outdoor air location every three (3) years. The next SVI monitoring event for the site is scheduled for the 1st quarter, 2017.

FIGURES



USGS Topographic Quadrangle Map – Mohegan Lake

Approximate Scale 1:31,000



Remediation Environmental Drilling

5 McCrea Hill Road Ballston Spa, NY 12020 p 518.885.5383 | f 518.885.5383 info@aztechtech.com | ww.aztechtech.com SITE: NYSDEC – Site # 3-60-023

Baldwin Place Shopping Center
(now Somers Commons)

Somers, New York

FIGURE 1

Site Location Map

