

Site Management Plan (SMP) Scoping Document
Industrial Overall Services Corp. Site, #360109; New Rochelle, Westchester County.
January 2018

The following is a scoping document for the Site Management Plan for the Industrial Overall Corp. Site (the “Site”). Since the Record of Decision is not yet issued and Remedy has not yet been finalized nor implemented, this document and the information herein is subject to change. However, the division of responsibilities as between NYSDEC and Manhattan Parking/Owner shall continue to be governed by the Order on Consent.

The Site Management Plan (SMP) will be organized in the following way:

1. Executive Summary
2. Introduction
3. Summary of Previous Investigations and Remedial Actions
4. Institutional and Engineering Control Plan
5. Monitoring and Sampling Plan
6. Periodic Assessments/Evaluations
7. Reporting and Notification Requirements
8. Groundwater Treatment Contingency Plan

The SMP will also include, but not be limited to, the following appendices:

1. Excavation/Soil Management Plan ¹
2. SVI mitigation system manufacturers specs
3. Permanganate cylinder specs and change-out information
4. HASP and CAMP
5. QA Project Plan
6. Various forms such as site cover inspection form, groundwater and indoor air sampling forms, etc.

¹ Should the site owner undertake any excavation under the site cover, any removal or handling of soils must be managed under the Excavation or Soil Management Plan.

The following table is a brief summary of the controls expected to be implemented for the Site, as well as the expected inspections, monitoring, maintenance, and reporting activities required by the final approved SMP:

Institutional Controls:	1. The property may be used for commercial or industrial use
	<p>2. ICs include:</p> <p>Groundwater use restriction</p> <p>Compliance with Environmental Easement and the final approved SMP by the Grantor and the Grantor's assigns and successors</p> <p>All ECs must be operated and maintained as specified in final approved SMP</p> <p>All ECs on the controlled property must be inspected at a frequency and in a manner defined in the final approved SMP</p> <p>Groundwater, soil vapor, and other environmental or public health monitoring must be performed as defined in the final approved SMP</p> <p>Data and information pertinent to site management of the controlled property must be reported at the frequency and in a manner specified by the final SMP</p> <p>Potential for soil vapor intrusion to be evaluated and if necessary monitored and mitigated for any new or existing structure on the site</p>
	3. All ECs must be inspected at a frequency and in a manner defined in the SMP. This statement is to be included here if there are ECs per the site's remedial program.

Engineering Controls:	1. A site Cover system that encompasses the entire site and is comprised of: The existing concrete floor slab of the on-site building An asphalt paved parking lot and any included concrete pads, sidewalks, and, for any exposed soils, the top one foot must meet the Site-specific soil cleanup objectives (SSCOs) and be underlain by a demarcation layer.	
	2. If SVI evaluation results require mitigation, a soil vapor intrusion mitigation system installed in the on-site building or future on-site buildings	
TASK		INITIAL Frequency
Inspections:		
1. NYSDEC		
a. site wide inspection		Annually
2. Owner		
a. Cover system inspection		Annually
b. SVI mitigation system full system check (if installed)		Annually
Monitoring and Sampling:		
1. NYSDEC		
a. Groundwater Monitoring Wells and permanganate cylinders		Quarterly
2. Owner		
a. SVI monitoring, if required based of SVI evaluation		Based on NYSDOH guidance
Maintenance:		
1. NYSDEC		
a. Permanganate cylinder replacement		As needed

2. Owner	
a. Site cover maintenance	As needed
b. SVI mitigation system maintenance	Quarterly or as needed
Reporting and Notification:	
1. NYSDEC	
a. Groundwater Data	Quarterly
b. Periodic Review Report which includes EC/IC certification by certifying parties	Annually
c. Reasonable notice to owner of sampling/inspection events	As needed
2. Owner	
a. Certification for Engineering Controls (SVI mitigation system and site cover) requires the certification and sign off of a Qualified Environmental Professional. This certification will be included the Periodic Review Report.	Annually
b. Notification to the Department should the site wide cover be compromised in any way, including but not limited to construction or other activities involving penetration of the site cover or intrusive activities.	As needed
Groundwater treatment contingency Plan:	
1. NYSDEC	
a. Development and implementation of a contingency groundwater contaminant mitigation plan should remedy be ineffective	As needed
2. Owner	
a. Not responsible	N/A

