

State Superfund Program

Citizen Participation Plan for White Plains Fire Department Drill School

June 2022

NYSDEC Site #360193 1402 Old Orchard Street White Plains, NY 10601 Westchester County, New York



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Note: The information presented in this Citizen Participation Plan was current as of the date of its approval by the New York State Department of Environmental Conservation. Portions of this Citizen Participation Plan may be revised during the site's investigation and cleanup process.

Responsible Party: The City of White Plains ("Responsible Party")
Site Name: White Plains Fire Department Drill School ("Site")
Site Address: 1402 Old Orchard Street, White Plains, New York

Site County: Westchester Site Number: 360193

1. What is New York's State Superfund Program?

New York's State Superfund Program (SSF) identifies and characterizes suspected inactive hazardous waste disposal sites. Sites that pose a significant threat to public health or the environment, such as the site identified above, undergo a process of investigation, evaluation, cleanup, and monitoring.

The New York State Department of Environmental Conservation (NYSDEC) administers the SSF Program with assistance and input from the New York State Department of Health (NYSDOH). When the parties responsible for the contamination of the site are known ("responsible parties"), they often pay for or perform the investigation and evaluation of cleanup options under an enforceable consent order. At sites where responsible parties cannot be found or are unable or unwilling to fund an investigation, the State pays for the investigation and may try to recover costs from a responsible party after the investigation and cleanup are complete.

The SSF program contains investigation and cleanup requirements, ensuring that cleanups protect public health and the environment. For more information about the SSF program, go online at: http://www.dec.ny.gov/chemical/8439.html .

2. Citizen Participation Activities

Why NYSDEC Involves the Public and Why It Is Important

NYSDEC involves the public to improve the process of investigating and cleaning up contaminated sites, and to enable citizens to participate more fully in decisions that affect their health, environment, and social well-being. NYSDEC provides opportunities for citizen involvement and encourages early two-way communication with citizens before decision-makers form or adopt final positions.

Involving citizens affected and interested in site investigation and cleanup programs is important for many reasons. These include:

• Promoting the development of timely, effective site investigation and cleanup programs that protect public health and the environment;

- Improving public access to, and understanding of, issues and information related to a particular site and that site's investigation and cleanup process;
- Providing citizens with early and continuing opportunities to participate in NYSDEC's site investigation and cleanup process;
- Ensuring that NYSDEC makes site investigation and cleanup decisions that benefit from input that reflects the interests and perspectives found within the affected community;
- Encouraging dialogue to promote the exchange of information among the affected/interested public, State agencies, and other interested parties that strengthens trust among the parties, increases understanding of site and community issues and concerns, and improves decision-making.

This Citizen Participation (CP) Plan provides information about how NYSDEC will inform and involve the public during the investigation and cleanup of the site identified above. The public information and involvement program will be carried out with assistance, as appropriate, from the responsible party.

Project Contacts

Appendix A identifies NYSDEC project contact(s) to whom the public should address questions or request information about the site's investigation and cleanup program. The public's suggestions about this CP Plan and the CP program for the Site are always welcome. Interested people are encouraged to share their ideas and suggestions with the project contacts at any time.

Locations of Reports and Information

The locations of the reports and information related to the Site's investigation and cleanup program also are identified in Appendix A. These locations provide convenient access to important project documents for public review and comment. Some documents may be placed on the NYSDEC website. If this occurs, NYSDEC will inform the public in fact sheets distributed about the Site and by other means, as appropriate.

Site Contact List

Appendix B contains the Site contact list. This list has been developed to keep the community informed about, and involved in, the Site's investigation and cleanup process. The Site contact list will be used periodically to distribute fact sheets that provide updates about the status of the project. These will include notifications of upcoming activities at

the Site (such as fieldwork), as well as availability of project documents and announcements about public comment periods.

The Site contact list includes, at a minimum:

- Chief executive officer and planning board chairperson of each county, city, town and village in which the Site is located;
- Residents, owners, and occupants of the Site and properties adjacent to the Site;
- The public water supplier that services the area in which the Site is located;
- Any person who has requested to be placed on the Site contact list;
- The administrator of any school or day care facility located on or near the Site for purposes of posting and/or dissemination of information at the facility; and
- Location(s) of reports and information.

The Site contact list will be reviewed periodically and updated as appropriate. Individuals and organizations will be added to the Site contact list upon request. Such requests should be submitted to the NYSDEC project contact(s) identified in Appendix A. Other additions to the Site contact list may be made at the discretion of the NYSDEC project manager, in consultation with other NYSDEC staff as appropriate.

Note: The first Site fact sheet (usually related to the draft Remedial Investigation Work Plan) is distributed both by paper mailing through the postal service and through DEC Delivers, its email listserv service. The fact sheet includes instructions for signing up with the appropriate county listserv to receive future notifications about the Site. See http://www.dec.ny.gov/chemical/61092.html.

Subsequent fact sheets about the Site will be distributed exclusively through the listserv, except for households without internet access that have indicated the need to continue to receive site information in paper form. Please advise the NYSDEC Site project manager identified in Appendix A if that is the case. Paper mailings may continue during the investigation and cleanup process for some sites, based on public interest and need.

CP Activities

The table at the end of this section identifies the CP activities, at a minimum, that have been and will be conducted during the Site's investigation and cleanup program. The flowchart in Appendix D shows how these CP activities integrate with the Site investigation and cleanup process. The public is informed about these CP activities through fact sheets and notices distributed at significant points during the program. Elements of the investigation and cleanup process that match up with the CP activities are explained briefly in Section 5.

- Notices and fact sheets help the interested and affected public to understand contamination issues related to a site, and the nature and progress of efforts to investigate and clean up a site.
- Public forums, comment periods and contact with project managers provide opportunities for the public to contribute information, opinions and perspectives that have potential to influence decisions about a site's investigation and cleanup.

The public is encouraged to contact project staff at any time during the Site's investigation and cleanup process with questions, comments, or requests for information.

This CP Plan may be revised due to changes in major issues of public concern identified in Section 3 or in the nature and scope of investigation and cleanup activities. Modifications may include additions to the Site contact list and changes in planned citizen participation activities.

Technical Assistance Grant

The site identified above poses a significant threat to public health or the environment, so that a qualifying community group may apply for a Technical Assistance Grant (TAG). The purpose of a TAG is to provide funds to the qualifying community group to obtain independent technical assistance. This assistance helps the TAG recipient to interpret and understand existing environmental information about the nature and extent of contamination related to the site and the development/implementation of a remedy.

An eligible community group must certify that its membership represents the interests of the community affected by the site, and that its members' health, economic well-being, or enjoyment of the environment may be affected by a release or threatened release of contamination at the site.

For more information about TAGs, go online at: http://www.dec.ny.gov/regulations/2590.html

Note: The table identifying the citizen participation activities related to the Site's investigation and cleanup program follows on the next page:

Citizen Participation Activities	Timing of CP Activity(ies)			
Before Start of Remedial Investigation (RI):				
 Prepare site contact list Establish document repository Prepare Citizen Participation (CP) Plan Place approved RI Work Plan in document repository Distribute fact sheet to site contact list that announces availability of RI Work Plan and describes upcoming RI field work 	Before start of RI. Note: Draft CP Plan must be submitted to NYSDEC within 20 days of effective date of Consent Order. CP Plan must be approved by NYSDEC before distribution.			
When NYSDEC Approves Remedial Investigation Report:				
Distribute fact sheet to site contact list that describes RI results Place approved RI Report in document repository	When NYSDEC approves RI Report			
When NYSDEC Releases Propos	ed Remedial Action Plan (PRAP)			
 Place PRAP in document repository Distribute fact sheet to site contact list that describes PRAP and announces 30-day comment period and public meeting Conduct 30-day public comment period Hold public meeting about PRAP 	When NYSDEC releases PRAP. Comment period begins/ends as per dates identified in fact sheet. Public meeting is held during the comment period.			
When NYSDEC Issues Record of Decision (ROD):				
Place ROD in document repository Distribute notice to site contact list that announces availability of ROD. ROD includes responsiveness summary of significant comments about PRAP	When NYSDEC issues ROD			
Before Start of F	Remedial Action:			
Distribute fact sheet to site contact list that describes upcoming remedial action	Before start of remedial action at the site			
When NYSDEC Certifies Clea	nup Requirements Achieved:			
Distribute fact sheet to site contact list that announces cleanup requirements achieved If Certificate of Completion (COC) is issued, announce in fact sheet If COC is issued, place copy in document repository	When NYSDEC certifies cleanup requirements achieved, or within 10 days after NYSDEC issues COC or other similar site closure document			
If NYSDEC Reci	assifies the Site			
If reclassifying site, may announce in fact sheet announcing achievement of cleanup requirements	At time NYSDEC proposes to reclassify the site			
If NYSDEC Proposes to Delist the Site f	rom the Registry of Contaminated Sites			
 Publish notice in Environmental Notice Bulletin about proposal and 30-day public comment period Distribute notice to site contact list. May announce proposal in fact sheet announcing achievement of cleanup requirements Conduct 30-day public comment period about proposed delist Distribute notice to site contact list when site is delisted 	At time NYSDEC proposes to delist the site			

3. Major Issues of Public Concern

This section of the CP Plan identifies major issues of public concern that relate to the Site. Additional major issues of public concern may be identified during the course of the Site's investigation and cleanup process.

Contamination in the form of PFAS compounds that were associated with the historic uses is currently present in soil, sediment, surface water, and groundwater at the Site and downgradient surface water bodies. Issues of public concern are associated with exposure to the existing contamination through potential impacts to the nearby public water supply and via direct contact with contaminated surface water. Currently, groundwater below the site is not pumped out or used for drinking water, and the downgradient potable water supply system is not in use. An Exposure Assessment will be completed as part of the upcoming Remedial Investigation (RI) phase to determine the potential for exposure associated with the contaminated media at the Site.

4. Site Information

Appendix C contains a map identifying the location of the Site.

Site Description

The Site is owned by The City of White Plains (the City) and is located at 1402 Old Orchard Street, White Plains, New York. The Site is 141 acres, mainly wooded with small streams, and contains the FDDS. The FDDS is situated within a 4-acre clearing within the wooded property that is located approximately 500 feet east of White Plains Reservoir #2. The Orchard Street Pumping Station (OSPS), also owned and operated by the City, is located in the western portion of the Site adjacent to Reservoir #2. Although indicated as separate lots on the City tax map, the FDDS property and the OSPS property are included under the same Tax ID number and considered one site for this investigation.

The Site is bounded to the northwest by Central Westchester Parkway, to the west by Reservoir #1 and Reservoir #2, to the north and northeast mainly by municipal land owned by the Town of North Castle with some residential properties, to the east by Silver Lake Park (owned by Westchester County) and residential properties, and to the south, southeast, and southwest by residential properties.

The Site is a mix of gentle and steep slopes with several isolated rocky peaks. The FDDS clearing is in a flatter section of the Site, and is surrounded to the north, east, and south by ridges that are higher in elevation than the clearing. The higher ridges slope gently downward to the central portion of the FDDS clearing, and then downward to the southwest to an intermittent stream adjacent to the FDDS. Thin isolated layers of overburden soils are present in the gently sloping, asphalt and grass covered portion of the FDDS area, with the surrounding area mainly consisting of exposed rock. The

intermittent stream runs from north to south below the FDDS access driveway and empties into East Pond on the southwestern side of the Site. Surface water from East Pond drains into Reservoir #2 through two drain culverts. The small, flat area on the western side of the Site that lies between the East Pond and the OSPS marks the geologic transition to an area dominated by overburden geology. A large low lying wetland area west of the OSPS is the likely discharge point for area groundwater and is also the settling area for surface flow that is released from Reservoir #2.

The OSPS property includes four cistern wells approximately 30-feet diameter and 30-feet deep that were originally installed to serve as potable water supply wells. The reservoirs and the cistern wells were last used for potable water supply in 2005 and 2006, respectively, and were taken off-line due to the cost for maintenance and operation. The City currently purchases all its drinking water from New York City's water supply system.

History of Site Use, Investigation, and Cleanup

Fire Department Drill School History:

The fire department training center has been in operation at the Site since approximately 1960. Fire department training included live fire training in several different scenarios. The City reported usage of aqueous film-forming foam (AFFF) by the fire department since the mid-1960s.

AFFF was reported to be used sparingly during the training scenarios, due to the cost of using foam versus water, but it was used on occasion. The City confirmed that AFFF was used to put out live training fires at a location in the south-central portion of the paved FDDS property near the burn building, and near empty barrels of foam and residual foam left in a pump truck after live fire response were reported to be cleaned out and discharged to the ground near the hydrant location on the Site, which is north adjacent to the access road and west adjacent to the stream the runs below the FDDS access driveway at the Site. These two areas of concern were the primary focus of the Site Characterization.

Orchard Street Pumping Station History

To provide redundancy to the current water supply and alleviate costs, the City began to explore the option of a new water treatment plant for the OSPS to put the station back online and serve as a redundant supply to the purchased New York City water. As part of the permit requirements for the project, water quality sampling was initiated in September 2018, and the laboratory results showed that PFAS compounds were detected in the cistern well samples. In an effort to identify a source for the PFAS compounds, two separate phases of investigation were conducted (in April and July 2019). The investigation included the collection of surface water samples from a stream system that runs through the Site, East Pond, Reservoir #1 and Reservoir #2, and the wetland area north and west of the OSPS, and the collection of groundwater samples from dam piezometer wells along the southern edge of Reservoir #2 and the four cistern

wells located on the OSPS property. The majority of the sample locations were repeated in July 2019 to obtain comparative results.

PFAS compounds were detected at notable concentrations in surface water samples collected from Reservoir #2, East Pond, and a stream flowing from the FDDS property, and in groundwater samples collected from the cistern wells and dam piezometers. Based on the results of the investigations, the FDDS was identified as the potential source for PFAS contamination associated with East Pond, Reservoir #2, and the OSPS.

Based on the results, the NYSDEC sent a letter to the City on December 4, 2019, identifying the Site as a potential hazardous waste site ("P" site), and stated that an investigation was necessary to determine whether hazardous waste had been disposed on the property. The City agreed to conduct the necessary investigation and entered in an Order of Consent (CO) between NYSDEC and the City that was effective October 1, 2020.

Investigation History:

A Site Characterization investigation was initiated in Spring 2021. The goal of the investigation was to further define the nature and extent of the identified PFAS at the Site and determine whether any identified contamination posed a significant threat to public health or the environment. The investigation was conducted in accordance with the NYSDEC-approved Site Characterization Work Plan (SCWP).

The SC field sampling scope of work consisted of: advancement of 19 soil borings, collection of continuous soil samples, the installation of six monitoring wells, and the collection of 35 soil samples, 12 co-located stream sediment and surface water samples, one isolated surface water sample, and 14 groundwater samples (from the cistern wells, dam piezometers, and newly installed monitoring wells) for laboratory analysis. Additional soil samples were collected from multiple depths at selected boring locations in accordance with the SCWP for the purpose of identifying the vertical nature of contamination.

The investigation did not document any evidence of a release of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), pesticides or metals. The investigation confirmed elevated concentrations of PFAS compounds are present in soil in the former fire suppression training area west-adjacent to the burn building on the FDDS property, and constituted the primary PFAS release area. PFAS compounds were detected at elevated, but lower concentrations relative to the fire suppression training area, in the PFAS drum washout area adjacent to the access driveway (considered a secondary source area) and intermittent stream on the FDDS property. The shallow soil (0 to 2 feet below grade) samples contained significantly higher concentrations of PFAS relative to the deeper soil samples, supporting a surface release mechanism. The soil sampling results provided release area definition to the east and south, but the extent of PFAS contamination needs to be confirmed to the west of the former fire suppression training area on the FDDS

property. The conceptual site model indicated that PFAS migrated downward through cracks in asphalt in the fire suppression area, into the saturated zone, and then flowing downgradient to the wetland and intermittent stream. PFAS compounds also migrated downgradient from the fire suppression training area over the asphalt to the intermittent stream, where the release would combine with the secondary release from the drum washout area. At this point, PFAS compounds would migrate in the intermittent stream during precipitation events to East Pond and Reservoir #2 and continue in surface water into the wetland west and downgradient of the OSPS. PFAS compounds have also migrated from East Pond and Reservoir #2 through the saturated overburden zone to the OSPS and wetland.

The Site Characterization identified a PFAS contamination source area on the FDDS site, and a resulting contamination emanating from the FDDS site through surface water into East Pond and Reservoir #2 and continuing downgradient through surface water and groundwater into the wetland adjacent to the OSPS, and in groundwater beneath the OSPS and wetland, respectively. The Site was listed on the Registry of Inactive Hazardous Waste Disposal Sites (Registry) as a Class 2 (significant threat) site by NYSDEC on January 26, 2022, in order to remediate contamination related to historic site uses.

5. Remedial Investigation and Cleanup Process

The initial site characterization was completed at the Site in accordance with the NYSDEC-approved Site Characterization Work Plan. The next phases of work include the "Remedial Investigation", or RI, and subsequent steps of the remedial process.

Remedial Investigation

The responsible party will continue investigating the site under the existing consent order, with oversight by NYSDEC and NYSDOH. The additional investigation is a detailed study called a RI, which will provide more detail about the PFAS contamination area and assist with developing an appropriate cleanup plan. The investigation work will be conducted in accordance with an NYSDEC-approved plan called a "Remedial Investigation Work Plan" and will be available for public review at the "Locations of Reports and Information" identified in Appendix A.

The RI has several goals:

- 1) fully define the nature and extent of contamination in soil, sediment, surface water, groundwater and any other parts of the environment that may be affected;
- 2) provide more data relating to the identified source(s) of the contamination;
- 3) assess the impact of the contamination on public health and the environment; and

4) provide information to support the development of a proposed remedy to address the contamination.

NYSDOH reviews and provides recommendations on activities that will be performed during the investigation to ensure that a complete picture of potential health impacts is understood. Such activities include identifying the ways contamination can reach people, such as through direct contact, eating, drinking, or breathing.

The information collected during the RI will be summarized in a report.

Feasibility Study

After the site investigation has begun, the responsible party, with oversight by NYSDEC will conduct a "Feasibility Study." This study uses information developed during the site investigation to develop and evaluate potential ways to clean up contamination related to the site. Another possibility is that the information collected during the site investigation may support the conclusion that no action, or no further action, is needed to address site-related contamination.

Interim Remedial Measures

An Interim Remedial Measure (IRM) is an action that can be undertaken at a site when an existing and defined source of contamination or exposure pathway can be effectively addressed before the site investigation and analysis of alternatives are completed.

Proposed Remedy

The evaluation of possible remedies ends with a recommended proposal to eliminate the threat posed by contaminants at the site. NYSDEC approves or prepares this proposal, called a "Proposed Remedial Action Plan" (PRAP). The PRAP describes the remedy preferred by NYSDEC, or a no action or no further action alternative. The PRAP summarizes the decision that led to the recommendation of the preferred remedy by discussing each alternative and the reasons for choosing or rejecting it. The goal of any cleanup plan is to protect public health and the environment. NYSDEC will present the PRAP to the public for its review and comment during a 30-day comment period and at a public meeting.

Selected Remedy

NYSDEC considers public comments as it selects the remedy to address contamination related to the site. The selected remedy will be described in a document called a "Record of Decision" (ROD). The ROD will explain why the remedy was selected and respond to

public comments. This document will be placed in the location of reports and information. If the selected remedy is no action or no further action, NYSDEC may then take steps to reclassify the site or remove the site from its list of contaminated sites.

Cleanup Action

If the Record of Decision for the site calls for cleanup action, the project then moves to designing and performing the actions to address the site contamination. When cleanup actions have been completed, NYSDEC will approve or prepare a Final Engineering Report that describes the cleanup actions undertaken and certifies that cleanup requirements have been achieved or will be achieved.

Certificate of Completion

Upon approval of the Final Engineering Report, NYSDEC may issue a Certificate of Completion (COC). The COC would recognize the findings of the Final Engineering Report and note that the cleanup program achieved a cleanup level consistent with specific categories of use for the site. The recipient of the COC would be entitled to limited liability as long as it complied with the terms of the COC, and other conditions.

A COC may be modified or revoked if, for example, the recipient does not comply with the terms of the COC, or if the recipient commits fraud regarding its certification that it has met cleanup levels.

Site Management

Site management is the last phase of the site cleanup program. This phase begins when the COC is issued. Site management may be conducted by NYSDEC, or by the responsible party under NYSDEC oversight, if contamination will remain in place. Site management incorporates any institutional and engineering controls required to ensure that the remedy implemented for the site remains protective of public health and the environment. All significant activities are detailed in a Site Management Plan.

An *institutional control* is a non-physical restriction on use of the site, such as a deed restriction that would prevent or restrict certain uses of the property. An institutional control may be used when the cleanup action leaves some contamination that makes the site suitable for some, but not all uses.

An *engineering control* is a physical barrier or method to manage contamination. Examples include: caps, covers, barriers, fences, and treatment of water supplies.

Site management also may include the operation and maintenance of a component of the remedy, such as a system that pumps and treats groundwater. Site management continues until NYSDEC determines that it is no longer needed. During the site management phase, NYSDEC may also take steps to reclassify the site or delist the site from the Registry.

Appendix A - Project Contacts and Locations of Reports and Information

Project Contacts

For information about the Site's investigation and cleanup program, the public may contact any of the following project staff:

New York State Department of Environmental Conservation (NYSDEC):

Brittany O'Brien-Drake Stephanie Mossey

Project Manager Public Participation Specialist

Division of Environmental Remediation Email: Stephanie.Mossey@dec.ny.gov

625 Broadway, 12th Floor

Albany, NY 12233 Phone: (518) 402-9672

Email: Brittany.OBrien-Drake@dec.ny.gov

New York State Department of Health (NYSDOH):

Shaun Surani Project Manager

Phone: (518) 402-7860

Email: shaun.surani@health.ny.gov

Locations of Reports and Information

The facilities identified below are being used to provide the public with convenient access to important project documents:

White Plains Public Library 100	DECInfo Locator:
Martine Avenue	https://www.dec.ny.gov/pubs/109457.html
White Plains, NY 10601	Online Database:
Phone: (914) 422-1400	https://www.dec.ny.gov/cfmx/extapps/derexternal/haz/details.cfm?P
Hours:	<u>rogNo=360193</u>
Monday through Thursday,	Document Folder:
10AM-9PM	https://www.dec.ny.gov/data/DecDocs/360193/
Friday, 10AM-6PM	
Saturday, 10AM-5PM	
Sunday, 1PM-5PM	

Appendix B – Site Contact List

Local, State, and Federal Officials

Stefania Mignone	Thomas Roach
Commissioner of Public Works	Mayor
City of White Plains	City of White Plains
255 Main Street	255 Main Street
White Plains, NY 10601	White Plains, NY 10601
George Latimer	Benjamin Boiykin II
Westchester County Executive	Westchester County Legislator Chairman
148 Martine Avenue	148 Martine Avenue, 8 th Floor
White Plains, New York 10601	White Plains, New York 10601
Chris Burdick	Shelly B. Mayor
Assemblyperson	U.S. Senator
100 S. Bedford Road, Suite 150	222 Grace Church Street, Suite 300
Mount Kisco, New York 10549	Port Chester, NY 10573
Dr. Joseph Ricca	
Superintendent of Schools	
5 Homeside Lane	
White Plains, NY 10605	

Local News Media

Mary Dolan
Executive Editor at Journal News
1133 Westchester Avenue, Suite N110
White Plains, NY 10604

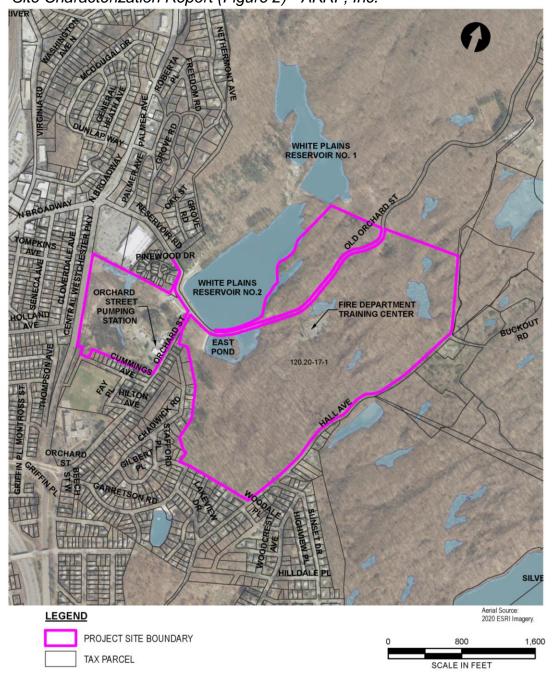
Public Water Supply

The City of White Plains currently purchases all its drinking water from New York City's water supply system. Public water is provided by The City of New York, Department of Environmental Protection (Customer Service Center, 59-17 Junction Boulevard, 13th Floor, Flushing, New York 11373).

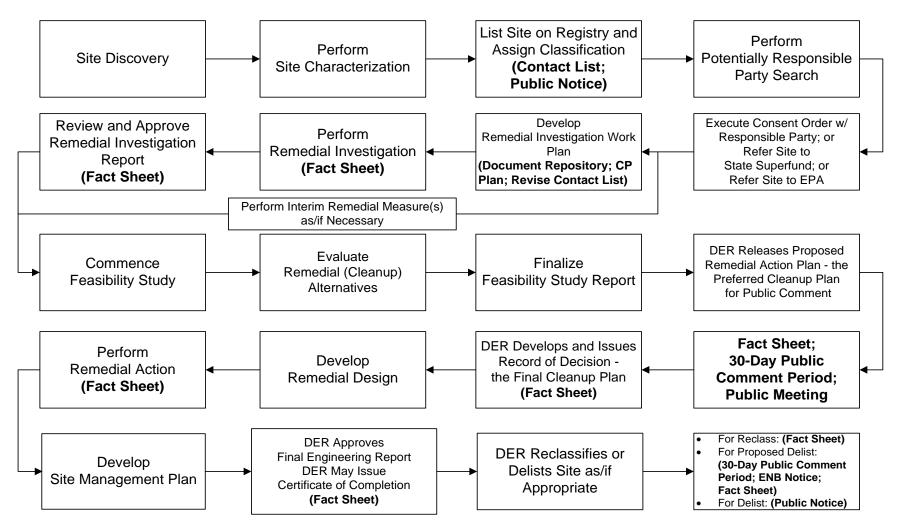
Appendix C - Site Location Map

City of White Plains Tax ID: 120.20-17-1

Street Number: 1402 Old Orchard Street, White Plains, NY Site Characterization Report (Figure 2) - AKRF, Inc.



Appendix D - State Superfund Program Remedial Process



Note: CP Activities are in Bold.