From: mail@sf-notifications.com on behalf of Mary Root <mail@sf-notifications.com>
Sent: Friday, August 24, 2018 9:27 AM
To: Spellman, John (DEC)
Subject: CPPs

GEI Consultants

John,

Mary Root has sent you files. Expires 11/22/18

A note from Mary :
John,

On behalf of National Grid, please find attached the Citizen Participation Plans (CPPs) for the Schenectady Clinton St., Oswego W. Utica St., and Rensselaer MGP sites that were submitted to George Heitzman of NYSDEC this morning.

Mary Root

Download

Trouble with the above link? You can copy and paste the following URL into your web browser: https://geiconsultants.sharefile.com/d-9d87b268893741c5

NEW YORK STATE OF OPPORTUNITY. Department of Environmental Conservation

State Superfund Program

Citizen Participation Plan
for
National Grid - Rensselaer
Former Manufactured Gas Plant Site

August 2018

NYSDEC Site No. 442057
Academy and Washington Streets
City of Rensselaer
Rensselaer County, New York

Contents

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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: **National Grid**
Site Name: **Rensselaer Former MGP Site ("Site")**
Site Address: **Academy and Washington Streets, Rensselaer, New York**
Site County: **Rensselaer**
Site Number: **442057**

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 remedial 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 that relate 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 web site. 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 which 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;
- 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 Remedial Investigation) 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. Previous Fact Sheets prepared for the Site are included in Appendix F.

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 this 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 that are identified for preparation and distribution 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 Proposed 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 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 Cleanup 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 Reclassifies 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 from 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. Potential Issues of Concern for the Community

General Issues of Concern at MGP Sites

The primary issue of concern for the community at, or adjacent to, a former manufactured gas plant site is the potential for an exposure to constituents of concern in air, soil, or groundwater. The constituents are related to the gas manufacturing process which generated several by-products. The primary by-product was coal tar. Some plants also used petroleum in the gas manufacture process. The constituents associated with these by-products are benzene, toluene, ethylbenzene, and xylenes (BTEX), and polycyclic aromatic hydrocarbons (PAHs). Another constituent of concern for these plants was cyanide. Following gas manufacture impurities had to be removed by routing the gas through a "purifier" before it was used. As a result, purifier wastes typically contained very stable cyanide compounds. If these tar, petroleum or purifier by-products are present at a site then people could potentially come into contact with these materials. If the by-products are present at a site then dissolved phase BTEX or PAH compounds, cyanide in groundwater, or mobile tars or emulsions, may migrate within the site, or to off-site areas through the subsurface.

People can be exposed to these constituents of concern through three major exposure routes including: breathing (also called inhalation), eating or drinking (also called ingestion), and getting residuals on the skin (also called dermal contact). If there is no contact with residuals through these routes, then there is no exposure. MGP sites have been inactive for many years; consequently, MGP-related residuals are often not on the ground surface where people will come into contact with them. However, if there are residuals on the surface, or if people dig into residuals or impacted soil and bring it to the surface, exposure through dermal contact, inhalation and accidental ingestion may occur. MGP-related constituents can also impact groundwater. The constituents of concern can then migrate and possibly affect public or private drinking water wells in the area.

In addition to the potential for people to be exposed to on-site residuals, remedial activities also have the potential to be disruptive to nearby entities including: the site owner and adjacent residents or businesses. During remedial activities, NYSDEC requires controls to prevent people from being exposed to constituents released to the air, dust, and odors from the excavations. Other disruptions to the community may include: road closures; increased truck traffic; and noise from construction activities. To address these concerns during site cleanup, the responsible party and their subcontractors prepare work plans which outline the controls and monitoring to be used for the cleanup activities. The remedial cleanup work proceeds after the plans are approved by the NYSDEC and the NYSDOH. The use of site controls and community air monitoring is in place during the period of the disruptive site activities.

Potential Concerns for the Rensselaer MGP Site

Potential concerns for this site were determined through the use of a NYSDEC Scoping Sheet, provided in Appendix E. The Remedial Investigation of the site found that MGP-related residuals had impacted the subsurface soil and groundwater. The investigation phase included a human health exposure assessment which found that people would be unlikely to have an exposure at the site because the residuals in soil and groundwater are deep, and subsurface excavation activities at the site are not expected. The surface of the site is covered by vegetation and gravel which would also act to prevent people from contacting impacted soil. There is no concern for people to be exposed to impacted groundwater because site groundwater is not used and there is a public supply for drinking water at the site and surrounding area. The remediation of the site, followed by the implementation of a NYSDEC-approved Site Management Plan, will more completely address any potential exposure concerns for people at the site and the surrounding area.

The NYSDEC has reviewed an analysis of possible remedial actions and has identified the remedy required for the site. The NYSDEC has also informed the community regarding the elements of the remedial action. Remedial activities at the site are anticipated to be performed in 2019 / 2020. To address the MGP-related residuals identified at the site, the remedy will include the excavation of coal tar-impacted soil from the site parking lot.

Remedial activities have the potential to be disruptive to the people who use the site and also the adjacent community. The disruptions may include the closure of roads, increased truck traffic, noise from construction activities, and odors from excavated materials. These potential concerns are addressed and planned for by the preparation of work plans that are submitted to, and approved by the NYSDEC and the NYSDOH prior to the start of the remedial actions. The remedial work is closely monitored during the field activities. Once the remedial action is complete, future activities at the site will be managed under a NYSDEC-approved Site Management Plan.

4. Site Information

Site Description

The site is located between Academy and Washington Streets in the City of Rensselaer, Rensselaer County, New York. The site is set in an urban area and is approximately 0.3 acres in size. The site is zoned for multi-family residential use. The site is abutted to the northwest by Academy Street, to the southwest by professional offices, to the southeast by Washington Street and the Capital View Office Park, and to the northeast by Huyck Square. Huyck Stream is located approximately 200 feet north of the site. A Site Location Map and Site Plan Figure are included in Appendix C.

History of Site Use

The MGP was constructed by the East Albany Gas Light Company between 1860 and 1887. Gas manufacturing was terminated sometime between 1918 and 1925. Following plant closure, the MGP structures were used for storage. Later the structures were used as a chemical laboratory by an owner who operated a cloth, carpet, and felt manufacturing facility. The former MGP structures were removed sometime between 1949 and 1967.

Site Investigation

A Site Characterization (SC) was conducted in 2005. A Remedial Investigation was performed in 2014.

Site Cleanup

The 2015 Decision Document requires excavation and disposal of a former holder and MGP structures, including approximately 2,300 cubic yards of soil. Remedial activities at the site are anticipated to be completed in 2019 / 2020. Following completion of the remedial activities, the site is anticipated to be restored to a parking lot.

Regulatory Status

The site is being managed according to an Order on Consent and Administrative Settlement, Index No.: CO 7-20180629-27 between National Grid and the NYSDEC. Prior to July 2018 the site was managed under a Voluntary Cleanup Agreement (VCA) under the NYSDEC's Voluntary Cleanup Program.

The September 2015 NYSDEC Decision Document (see Appendix G) presents the selected remedy to be implemented at the site.

Current Site Status

The majority of the site is paved. It is used as a parking lot for employees of nearby State offices.

5. NYSDEC Investigation and Cleanup Process

Investigation

A detailed study of the site was performed by {the responsible party under a consent order, with oversight by} NYSDEC and NYSDOH. This detailed study is called a "Remedial Investigation". The investigation work plan is called a "Remedial Investigation

Work Plan" and is available for public review at the "Locations of Reports and Information" identified in Appendix A.

The site investigation has several goals:
1) define the nature and extent of contamination in soil, surface water, groundwater and any other parts of the environment that may be affected;
2) identify the 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 recommends 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 site investigation is summarized in the 2014 Remedial Investigation Report.

Feasibility Study

After the site investigation has begun, the responsible party, with oversight by NYSDEC conducted an "Alternatives Analysis" also known as 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.

An Alternatives Analysis (AA) was performed in 2015.

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.

The NYSDEC Decision Document was issued in September 2015.

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

National Grid – Rensselaer Non-Owned Former MGP Site
NYSDEC Site No. 442057

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):	
Mr. John Spellman, P.E. Project Manager NYSDEC Division of Environmental Remediation 625 Broadway Albany, NY 12233-7014 Phone: (518) 402-9662	Mr. Rick Georgeson Citizen Participation Specialist NYSDEC Region 4 1130 N. Westcott Rd. Schenectady, NY 12306 Phone: (518) 357-2075
New York State Department of Health (NYSDOH):	
Ms. Melissa Doroski NYSDOH Empire State Plaza Albany, NY 12237 Phone: (518) 402-7860	
Locations of Reports and Information	
The facilities identified below are being used to provide the public with convenient access to important project documents:	
Rensselaer Public Library Attn: Ms. Jane Chirgwin 676 East St. Rensselaer, NY 12144 Phone: (518) 462-1193 Hours: Monday 12:00 PM - 5:00 PM Tuesday 10:00 AM - 5:00 PM Wednesday 10:00 AM - 8:00 PM Thursday 10:00 AM - 8:00 PM Friday 10:00 AM - 5:00 PM Saturday 10:00 AM - 3:00 PM	NYSDEC Region 4 – Document Repository 1130 N. Westcott Rd. Schenectady, NY 12306 Phone: (518) 357-2068 (call for appointment)

Appendix B

Site Contact List

National Grid – Rensselaer Non-Owned Former MGP Site
NYSDEC Site No. 442057

CONTACT	CONTACT INFORMATION
City/Village Chief Executive Officer Mr. Daniel J. Dwyer, Mayor	**Contact Information** 62 Washington St. Rensselaer, NY 12144 Phone: (518) 462-9511
Planning Board Chairperson Ms. Christine VanVorst	**Contact Information** Phone: (518) 465-1693
Residents, Owners and Occupants of the Site	**Maintained confidentially in the NYSDEC Managers Files**
Public Water Supply Manager Dominick Tagliento, Commissioner	**Contact Information** 62 Washington St. Rensselaer, NY 12144 Phone: (518) 462-6466
Individuals Requesting to be on Contact List To Be Determined	**Contact Information** To Be Determined
Nearby School or Daycare Administrator Mr. Joseph Kardash Rensselaer City School District Superintendent Giffen Memorial Elementary School Ernestina Di Cioccio Day Care A Tiny Tot's Daycare Center Note: Facilities listed are within one mile of the Site.	**Contact Information** 25 Van Rensselaer Dr. Rensselaer, NY 12144 Phone: (518) 436-8561 274 S Pearl St., Albany, NY 12202 230 Green St., Albany, NY 12202 34 Broadway, Rensselaer, NY 12144

City/Village Document Repository	**Location**
Rensselaer Public Library Attn: Ms. Jane Chirgwin	676 East St. Rensselaer, NY 12144 Phone: (518) 462-1193 Hours: Monday 12:00 PM - 5:00 PM Tuesday 10:00 AM - 5:00 PM Wednesday 10:00 AM - 8:00 PM Thursday 10:00 AM - 8:00 PM Friday 10:00 AM - 5:00 PM Saturday 10:00 AM - 3:00 PM
NYSDEC Regional Document Repository	**Location**
NYSDEC Region 4 – Document Repository	1130 N. Westcott Rd. Schenectady, NY 12306 Phone: (518) 357-2068 (call for appointment)
Future Notification Requests for Information From the NYSDEC	http://www.dec.ny.gov/chemical/61092.html

Appendix C

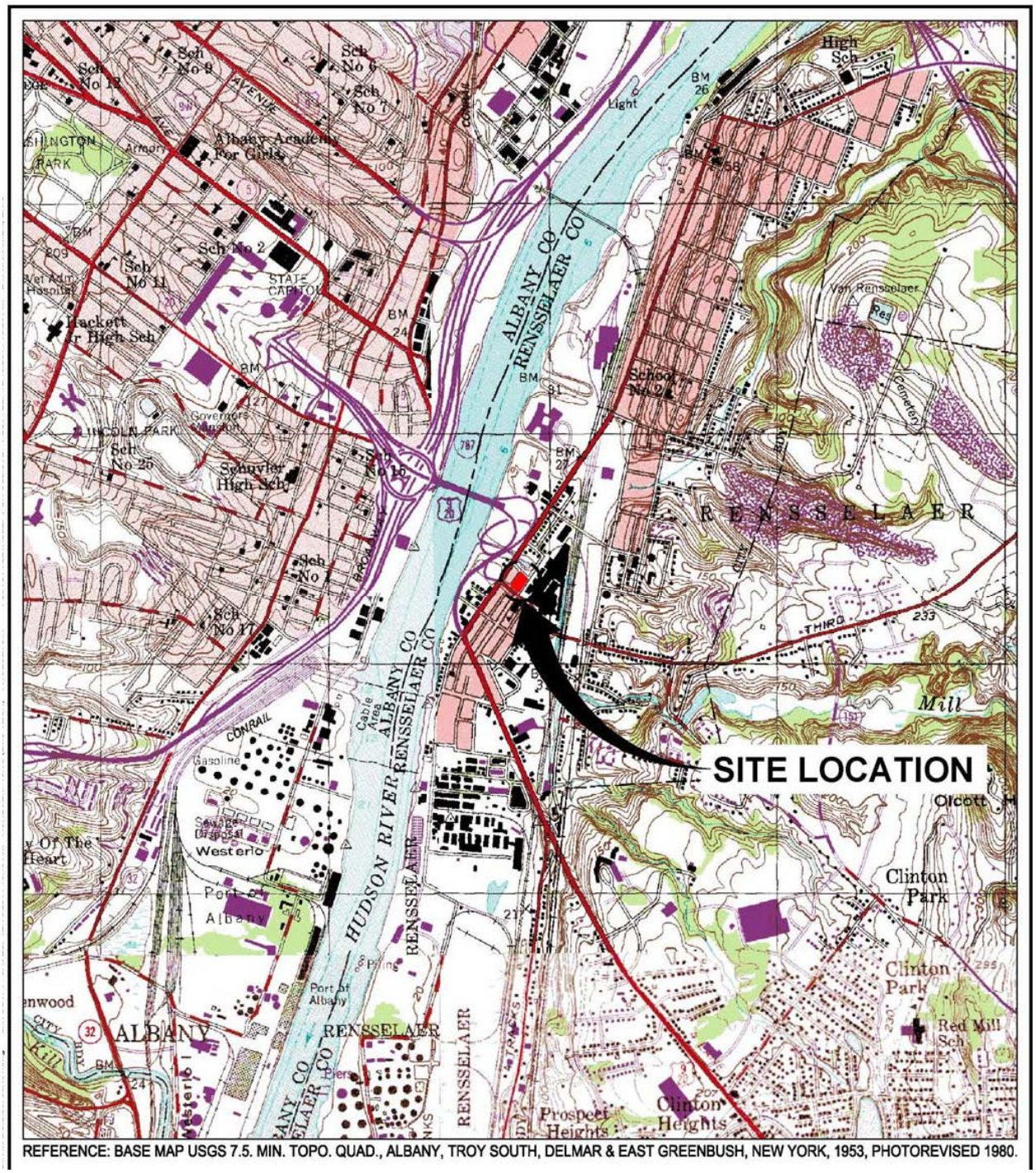
Site Location Maps

Appendix C

Site Location

National Grid – Rensselaer Non-Owned Former MGP Site

NYSDEC Site No. 442057

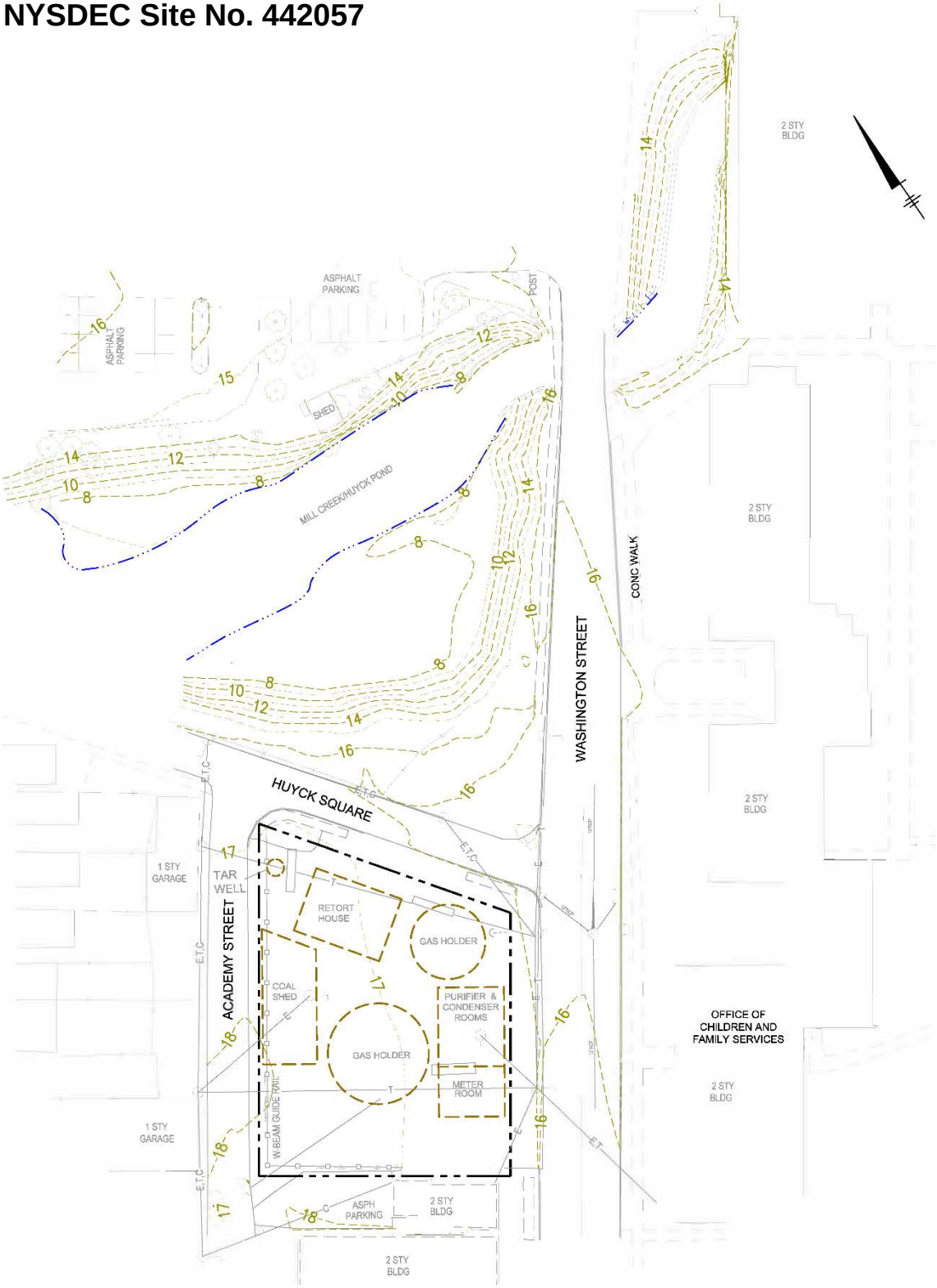


Appendix C

Site Plan

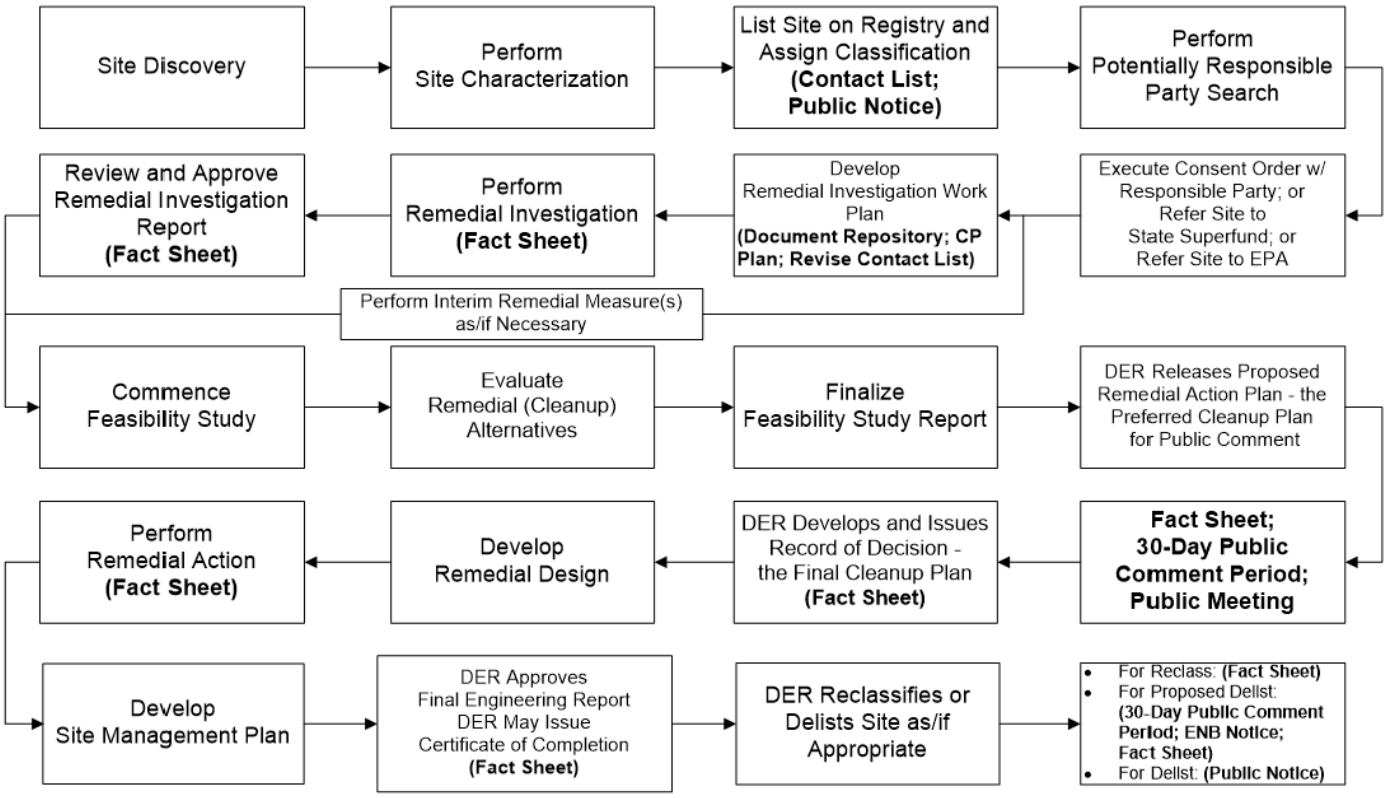
National Grid – Rensselaer Non-Owned Former MGP Site

NYSDEC Site No. 442057



Appendix D

State Superfund Program Process



Note: CP Activities are in **Bold**.

Appendix E

NYSDEC Scoping Sheet

Division of Environmental Remediation

Remedial Programs
Scoping Sheet for Major Issues of Public Concern

Site Name: Rensselaer Former Manufactured Gas Plant Site

Site Number: 442057

Site Address and County: Academy and Washington Streets, City of Rensselaer, Rensselaer County, New York

Remedial Party(ies): National Grid

Note: For Parts 1. – 3. the individuals, groups, organizations, businesses and units of government identified should be added to the site contact list as appropriate.

Part 1. List major issues of public concern and information the community wants. Identify individuals, groups, organizations, businesses and/or units of government related to the issue(s) and information needs. **Use this information as an aid to prepare or update the Major Issues of Public Concern section of the site Citizen Participation Plan.**

Remedial activities at the site are anticipated to be completed in late-2019 or mid-2020, and will generally consist of the excavation of coal tar-impacted soil from the Site parking lot. Impacted soils resulted from manufactured gas plant operations occurring in the late 1800s and early 1900s. Remedial activities have the potential to be disruptive to nearby entities including but not limited to: The Office of Children and Family Services (OCFS, to the east); Accu Care Home Service (to the south); and private residences (to the west). Disruptions may include: road closures; increased truck traffic; noise from construction activities; odors from excavated material. Remedial activities are anticipated to require approximately 4 to 5 months to complete. Following completion of the remedial activities, the site is anticipated to restored to a parking lot used by the OCFS.

How were these issues and/or information needs identified?

Needs are typical to remediation projects. National Grid has been in contact with representatives from the OCFS over the past several years.

Part 2. List important information needed **from** the community, if applicable. Identify individuals, groups, organizations, businesses and/or units of government related to the information needed.
None to date, MGP operations occurred more than 100 years ago.

How were these information needs identified?

Not Applicable

Part 3. List major issues and information that need to be communicated **to** the community. Identify individuals, groups, organizations, businesses and/or units of government related to the issue(s) and/or information.

The May 2014 Remedial Investigation Report details the sampling activities that were completed to delineate impacted media at the site. The April 2015 Alternatives Analysis Reports evaluates various remedial measures that could implemented at the site. The September 2015 NYSDEC Decision Document presents the selected remedy to be implemented at the site. The July 2016 Remedial Design

Work Plan present a summary of the supplemental investigation activities necessary to prepare the remedial design and the anticipated design components. The March 13, 2018 letter report summarizes the results of the completed supplement/pre-design investigation activities. All of these documents can be found in the project's document repository established at the Rensselaer City Library. Once completed, the final Remedial Design Report will be added the repository.

Additionally, a community fact sheet will be distributed prior to remedial construction to update the public on the upcoming site work. The Remedial Design Report will detail and the fact sheet will summarize the controls to be implemented to protect the surrounding community from potential impacts/nuisances associated with the remedial construction activities. Controls will include: community air monitoring; use of odor suppressing foams/sprays; and development of a traffic control plan.

How were these issues and/or information needs identified?

Needs are typical to remediation projects

Part 4. Identify the following characteristics of the affected/interested community. This knowledge will help to identify and understand issues and information important to the community, and ways to effectively develop and implement the site citizen participation plan (mark all that apply):

a. Land use/zoning at and around site:
☒ **Residential** ☐ **Agricultural** ☐ **Recreational** ☒ **Commercial** ☐ **Industrial**

b. Residential type around site:
☒ **Urban** ☐ **Suburban** ☐ **Rural**

c. Population density around site:
☐ **High** ☒ **Medium** ☐ **Low**

d. Water supply of nearby residences:
☒ **Public** ☐ **Private Wells** ☐ **Mixed**

e. Is part or all of the water supply of the affected/interested community currently impacted by the site?
☐ **Yes** ☒ **No**

Provide details if appropriate:
Not applicable

f. Other environmental issues significantly impacted/impacting the affected community?
☐ **Yes** ☒ **No**

Provide details if appropriate:
Not applicable

g. Is the site and/or the affected/interested community wholly or partly in an Environmental Justice Area?
☒ **Yes (Potential EJ Area)** ☐ **No**

h. Special considerations:
☐ **Language** ☐ **Age** ☒ **Transportation** ☐ **Other**

Explain any marked categories in **h:**

Parking lot is used by the OCFS. Adjacent streets are used for parking by residents, visitors, etc. These areas will be closed during / used to support remedial construction activities.

Part 5. The site contact list must include, at a minimum, the individuals, groups, and organizations identified in Part 2. of the Citizen Participation Plan under 'Site Contact List'. Are *other* individuals,

groups, organizations, and units of government affected by, or interested in, the site, or its remedial program? (Mark and identify all that apply, then adjust the site contact list as appropriate.)

☐ **Non-Adjacent Residents/Property Owners:** Not applicable

☒ **Local Officials:** Provided in Appendix A and B of the CPP

☐ **Media:** Not applicable

☐ **Business/Commercial Interests:** Not applicable

☐ **Labor Group(s)/Employees:** Not applicable

☐ **Indian Nation:** Not applicable

☐ **Citizens/Community Group(s):** Not applicable

☐ **Environmental Justice Group(s):** Not applicable

☐ **Environmental Group(s):** Not applicable

☐ **Civic Group(s):** Not applicable

☐ **Recreational Group(s):** Not applicable

☒ **Other(s):** Faith & Love Fellowship (Church, 85 Washington Street)

Prepared/Updated By: National Grid **Date:** August 2018

Reviewed/Approved By: Click here to enter text. **Date:** Click here to enter text.

Appendix F

NYSDEC Fact Sheets

NEW YORK STATE | Department of Environmental Conservation

May 2015

FACT SHEET

Voluntary Cleanup Program

Receive Site Fact Sheets by *Email.* See "For More Information" to Learn How.

Site Name: NM – Rensselaer MGP
DEC Site #: V00488
Address: Washington St
Rensselaer, NY 12144

Have questions? See "Who to Contact" Below

Remedy Proposed for Voluntary Cleanup Site Contamination; Public Comment Period Announced

The public is invited to comment on a proposed remedy being reviewed by the New York State Department of Environmental Conservation (NYSDEC) to address contamination related to the Niagara Mohawk (NM) – Rensselaer Manufactured Gas Plant (MGP) site ("site") located on Washington St, in the City of Rensselaer, Rensselaer County. Please see the map for the site location. Documents related to the cleanup of this site can be found at the location identified below under "Where to Find Information."

The cleanup activities will be performed and funded by Niagara Mohawk doing business as (dba) National Grid (volunteer) with oversight provided by NYSDEC. It is estimated that the cleanup will cost approximately $3.9 million and take approximately 3 months to complete.

Additional site details, including environmental and health assessment summaries, are available on NYSDEC's website at:
http://www.dec.ny.gov/cfmx/extapps/derexternal/haz/details.cfm?pageid=3&progno=V00488

How to Comment
NYSDEC is accepting written comments about the proposed cleanup plan for 45 days, from **May 5, 2015** through **June 19, 2015**. The draft Alternatives Analysis (AA) Report containing the proposed site remedy is available for public review at the location(s) identified below under "Where to Find Information." Please submit comments to the NYSDEC project manager listed under Project Related Questions in the "Who to Contact" area below.

The proposed remedy consists of:

1. Excavation and off-site disposal of the contents of the former gas holders and tar well.

2. Solidification of soil containing mobile non aqueous liquid (NAPL) in the area immediately north of the former Manufactured Gas Plant (MGP) area to a depth of 20 feet below grade, if determined necessary as a result of a pre-design investigation. NAPL is a redish brown oily liquid by-product of gas production which formed as a condensate as the gas cooled that does not mix easily with water. The contaminated soil will be mixed in-place with solidifying

agents (typically Portland cement) or other binding agents using an excavator or augers. The result is a low permeability mass that retards groundwater flow and inhibits the migration of contaminants.

3. Clean fill meeting the requirements of DEC regulations will be brought in to establish the designed grades at the site.

4. A cover system will be installed across the site and off-site areas where in-situ solidification (ISS) is performed, if deemed necessary, to prevent exposure to remaining contamination. The on-site cover will be either structures such as buildings, pavement, sidewalks, or a minimum of two feet of soil meeting the soil cleanup objectives (SCOs) for cover material as set forth in DEC regulations for restricted residential use. Where the soil cover is required off-site in the areas where ISS is performed, it will consist of a minimum of four (4) feet of soil meeting the SCOs for residential use.

5. Placement of an environmental easement on the property that will allow the use and development of the controlled property for restricted residential, commercial and industrial uses (subject to local zoning laws) and restrict the use of groundwater as a source of potable or process water.

6. Placement of an agreement with the on and off-site property owner(s) to implement the remedy and any necessary future site management plan on property not owned by Niagara Mohawk dba National Grid.

7. Development of a site management plan which will detail the soil management in the event of future excavations in addition to long-term monitoring.

Summary of the Investigation
A remedial investigation (RI) was completed to delineate the nature and extent of contamination at the site. The RI was completed in several phases from 2008 until 2014. Manufactured Gas Plant (MGP) contaminants of concern including benzene, toluene, ethylbenzene, xylene and polycyclic aromatic hydrocarbons are present in the soil and groundwater, both on-site and adjacent to the site at levels exceeding applicable cleanup standards. Coal tar is present in the subsurface soil.

Next Steps
NYSDEC will consider public comments received on the proposed remedy presented in the draft Alternative Analysis (AA) Report and ultimately issue a final Decision Document. The New York State Department of Health (NYSDOH) must also concur with the remedy. The final Alternative Analysis Report (with revisions if necessary) and the Decision Document will be made available to the public. The volunteer may then design and perform the cleanup action to address the site contamination, with oversight by NYSDEC and NYSDOH.

NYSDEC will keep the public informed throughout the investigation and cleanup of the site.

Background
Location: The Rensselaer Former Manufactured Gas Plant (MGP) Site is located at 89 Washington Street in the City of Rensselaer, Rensselaer County, NY.

Site Features: This trapezoidal site comprises approximately 0.3 acres in a mixed commercial and residential area. The entire site is covered by asphalt and is generally flat with a slight decline to the southeast. The site is abutted to the northwest by Academy Street, to the southwest by commercial buildings, to the southeast by Washington Street, and to the northeast by Huyck Square and undeveloped land. Huyck Stream is located approximately 200 feet north of the site.

Current Zoning and Land Use: The site is currently used as a parking lot and is located in an area zoned for downtown mixed use (e.g., commercial/residential) and planned development district land use.

Past Use of the Site: Manufactured Gas Plant operations, which appear to have led to site contamination, occurred at the site from approximately 1870 to 1920.

Site Geology and Hydrogeology: The overburden, in descending order from the ground surface consists of fill, silt and sand, sand and gravel, and glacial till underlain by bedrock. Bedrock is encountered at a depth ranging from approximately 23 to 28 feet below grade. Groundwater depth across the site ranges from 6 to 8 feet below ground surface. The direction of flow in the vicinity of the site is north-northeast toward Huyck stream. The direction of flow north of the stream is south toward the stream.

Voluntary Cleanup Program: New York's Voluntary Cleanup Program (VCP) was developed to encourage private sector volunteers to investigate and clean up contaminated properties and return these sites to productive use. Once cleaned up, the properties may be redeveloped for commercial, industrial, residential or public use.

For more information about the VCP, visit: http://www.dec.ny.gov/chemical/8442.html

FOR MORE INFORMATION

Where to Find Information

Project documents are available at the following location to help the public stay informed.

Rensselaer City Library
810 Broadway
Rensselaer, NY 12144
Phone: (518) 462-1193

Who to Contact
Comments and questions are always welcome and should be directed as follows:

Project Related Questions
Jamie Verrigni
Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, NY 12233-7014
(518) 402-9662
jamie.verrigni@dec.ny.gov
Please call for an appointment

Site Related Health Questions
Melissa Doroski
New York State Department of Health
Empire State Plaza
Corning Tower Room 1787
Albany, NY 12237
(518) 402-7860
beei@health.ny.gov

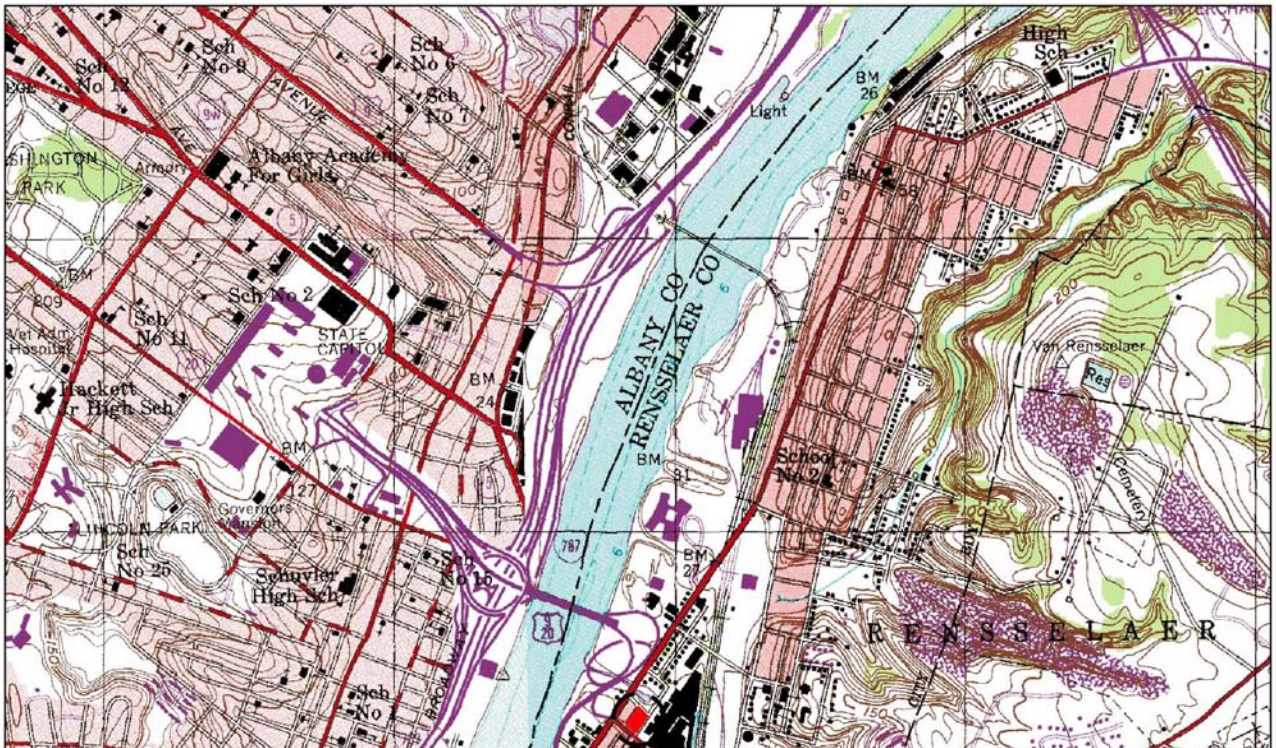
We encourage you to share this fact sheet with neighbors and tenants, and/or post this fact sheet in a prominent area of your building for others to see.

Receive Site Fact Sheets by Email
Have site information such as this fact sheet sent right to your email inbox.

NYSDEC invites you to sign up with one or more contaminated sites county email listservs available at the following web page: http://www.dec.ny.gov/chemical/61092.html. It's quick, it's free,
and it will help keep you *better informed*.

As a listserv member, you will periodically receive site-related information/announcements for all contaminated sites in the county(ies) you select.

Note: Please disregard if you already have signed up and received this fact sheet electronically.



REFERENCE: BASE MAP USGS 7.5. MIN. TOPO. QUAD., ALBANY, TROY SOUTH, DELMAR & EAST GREENBUSH, NEW YORK, 1953, PHOTOREVISED 1980.

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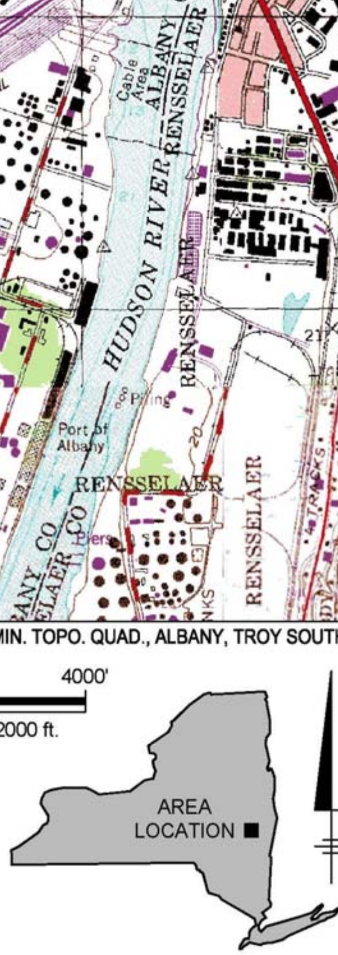
Approximate Scale: 1 in. = 2000 ft.



NATIONAL GRID
RENSSELAER NON-OWNED FORMER MGP SITE
RENSSELAER, NEW YORK
ALTERNATIVES ANALYSIS REPORT

SITE LOCATION MAP

ARCADIS

FIGURE
1

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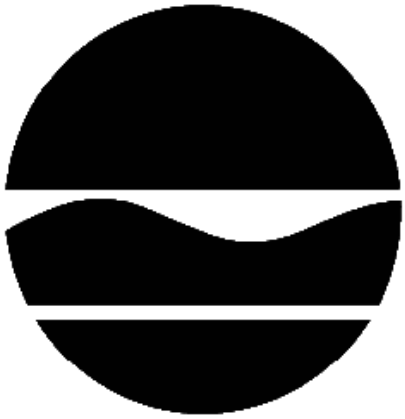
Appendix G

Decision Document

DECISION DOCUMENT

NM - Rensselaer MGP
Voluntary Cleanup Program
Rensselaer, Rensselaer County
Site No. V00488
September 2015



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

DECLARATION STATEMENT - DECISION DOCUMENT

NM - Rensselaer MGP
Voluntary Cleanup Program
Rensselaer, Rensselaer County
Site No. V00488
September 2015

Statement of Purpose and Basis

This document presents the remedy for the NM - Rensselaer MGP site, a voluntary cleanup site. The remedial program was chosen in accordance with the New York State Environmental Conservation Law and applicable guidance.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the NM - Rensselaer MGP site and the public's input to the proposed remedy presented by the Department.

Description of Selected Remedy

The selected remedy is referred to as the Source Removal, Cover System and Institutional Controls remedy. The elements of the remedy are as follows:

1. Remedial Design

A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows;

• Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;

• Reducing direct and indirect greenhouse gases and other emissions;

• Increasing energy efficiency and minimizing use of non-renewable energy;

• Conserving and efficiently managing resources and materials;

• Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;

• Maximizing habitat value and creating habitat when possible;

• Fostering green and healthy communities and working landscapes which balance ecological, economic and social goals; and

• Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.

2. Excavation and/or In Situ Solidification

Excavation and off-site disposal of the structure and contents of the former Manufactured Gas Plant (MGP) holders and the former tar well structure and contents, and contaminated soils on the former MGP property meeting the following criteria:

• visible tar or oil (i.e., tar coated or tar saturated) in material with total PAHs over 500 ppm.

The tar well and former holders will be excavated to depths up to thirteen (13) feet below ground surface (bgs). Approximately 2,300 cubic yards of soil will be removed from the site and disposed off-site. Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) for restricted-residential use will be brought in to complete the backfilling and establish the designed grades at the site.

A pre-design investigation will be conducted in the area immediately north of the northern gas holder and tar well to further evaluate the potential for non-aqueous phase liquid (NAPL) to migrate (i.e., the presence of tar coated or tar saturated material). Based on the results of this investigation, this area will be addressed, if determined necessary, by excavation and off-site disposal and/or in-situ solidification (ISS). ISS is a process that binds the soil particles in place creating a low permeability mass. The soil is mixed in place together with solidifying agents (typically Portland cement) or other binding agents using an excavator or augers. The soil and binding agents are mixed to produce a solidified mass resulting in a low permeability monolith. The treatment zone will extend to the top of till (approximately 20 feet below grade) in areas where NAPL that has the potential to migrate is present. The solidified mass will then be covered with a cover system as described in element 4 to prevent direct exposure to the solidified mass and protect it from freeze-thaw cycles. The resulting solid matrix reduces or eliminates mobility of contamination and reduces or eliminates the matrix as a source of groundwater contamination.

To facilitate implementation of ISS, if determined necessary, the top four feet of soil, plus additional material to account for expansion of the ISS material, will be excavated. Soil will be excavated and either stockpiled for re-use on-site or disposed off-site. Soil which does not exceed SCOs for restricted residential use and the protection of groundwater may be stockpiled to backfill the on-site excavation or to construct the site cover, to the extent that a sufficient volume of off-site soil is available.

For any off-site excavation determined necessary during the PDI, clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) for residential use and protection of groundwater will be brought in to complete the backfilling of the off-site excavation and establish the designed grades at the off-site properties.

3. Cover System

A site cover will be required to allow for restricted residential use of the site. The cover will consist either of the existing asphalt pavement, structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper two feet of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where the soil cover is required it will be a minimum of two feet of soil, meeting the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d) for restricted residential use. The soil cover will be placed over a demarcation layer with the upper six inches of the soil of sufficient quality to maintain a vegetation layer. Any fill material brought to the site will meet the requirements for the identified site use as set forth in 6 NYCRR Part 375-6.7(d).

A thicker site cover will be required in areas where ISS (if deemed necessary) is performed to protect the solidified soils from freeze-thaw cycles. These areas will be restored to existing grade and the cover will consist of a minimum of four feet of soil meeting the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d) for residential use. Implementation of this requirement will be subject to a site management plan and an agreement with the off-site property owner(s). A site management plan and an agreement with the off-site property owner(s) will not be required if impacted off-site soil is removed and residential SCOs are met.

4. Institutional Control

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

a. requires the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8(h)(3);

b. allows the use and development of the controlled property for restricted residential, commercial and industrial uses as defined by Part 375-1.8(g), although land use is subject to local zoning laws;

c. restricts the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County DOH;

d. requires compliance with the Department approved Site Management Plan.

5. Site Management Plan

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

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

Institutional Controls:

a. The environmental easement discussed in remedial element #5 above.

b. An agreement with the off-site property owner(s) to implement the remedy and necessary future site management plan on the off-site property.

Engineering Controls: The site cover and solidified soils (if deemed necessary) discussed above

This plan includes, but may not be limited to:

• an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;

• descriptions of the provisions of an environmental easement including any land use, and/or groundwater use restrictions;

•a provision for evaluation of the potential for soil vapor intrusion for any buildings developed on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;

• provisions for the management and inspection of the identified engineering controls;

• maintaining site access controls and Department notification; and

• the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.

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

• monitoring of groundwater and NAPL to assess the performance and effectiveness of the remedy;

• a schedule of monitoring and frequency of submittals to the Department; and

•monitoring for vapor intrusion for any buildings developed on the site, as may be required by the Institutional and Engineering Control Plan discussed above.

Declaration

The remedy conforms with promulgated standards and criteria that are directly applicable, or that are relevant and appropriate and takes into consideration Department guidance, as appropriate. The remedy is protective of public health and the environment.

September 1, 2015
Date

George Heitzman, Director
Remedial Bureau C

DECISION DOCUMENT

NM - Rensselaer MGP
Rensselaer, Rensselaer County
Site No. V00488
September 2015

SECTION 1: SUMMARY AND PURPOSE

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), has selected a remedy for the above referenced site. The disposal of contaminants at the site has resulted in threats to public health and the environment that would be addressed by the remedy. The disposal or release of contaminants at this site, as more fully described in this document, has contaminated various environmental media. Contaminants include hazardous waste and/or petroleum.

The Voluntary Cleanup Program (VCP) is a voluntary program. The goal of the VCP is to enhance private sector cleanup of brownfields by enabling parties to remediate sites using private rather than public funds and to reduce the development pressures on "greenfields." This document is a summary of the information that can be found in the site-related reports and documents.

SECTION 2: CITIZEN PARTICIPATION

The Department seeks input from the community on all remedies. A public comment period was held, during which the public was encouraged to submit comment on the proposed remedy. All comments on the remedy received during the comment period were considered by the Department in selecting a remedy for the site. Site-related reports and documents were made available for review by the public at the following document repository:

Rensselaer City Library
810 Broadway
Rensselaer, NY 12144
Phone: (518) 462-1193

Receive Site Citizen Participation Information By Email

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

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

SECTION 3: SITE DESCRIPTION AND HISTORY

Location: The Rensselaer Former Manufactured Gas Plant (MGP) Site is located at 89 Washington Street in the City of Rensselaer, Rensselaer County, NY.

Site Features: This trapezoidal site comprises approximately 0.3 acres in a mixed commercial and residential area. The entire site is covered by asphalt, used as a parking lot, and is generally flat with a slight decline to the southeast. The site is abutted to the northwest by Academy Street, to the southwest by commercial buildings, to the southeast by Washington Street, and to the northeast by Huyck Square and undeveloped land. Huyck Stream is located approximately 200 feet north of the site.

Current Zoning and Land Use: The site is currently used as a parking lot and is located in an area zoned for downtown mixed use (e.g., commercial/residential) and planned development district land use. There are no structures on the site.

Past Use of the Site: Manufactured Gas Plant operations, which caused the site contamination, occurred at the site from approximately 1870 to 1920. Historically a number of MGP structures were present on the site, including two gas holders, a tar well, a retort house, coal shed, purifier and condenser rooms, and a meter room.

Site Geology and Hydrogeology: The overburden, in descending order from the ground surface consists of fill, silt and sand, sand and gravel, and glacial till underlain by bedrock. Bedrock is encountered at a depth ranging from approximately 23 to 28 feet below grade. Groundwater depth across the site ranges from 6 to 8 feet below ground surface. The direction of flow in the vicinity of the site is north-northeast toward Huyck stream.

A site location map is attached as Figure 1.

SECTION 4: LAND USE AND PHYSICAL SETTING

The Department may consider the current, intended, and reasonably anticipated future land use of the site and its surroundings when evaluating a remedy for soil remediation. For this site, at a minimum, alternatives (or an alternative) that restrict(s) the use of the site to restricted-residential use (which allows for commercial use and industrial use) as described in DER-10, Technical Guidance for Site Investigation and Remediation were/was evaluated.

A comparison of the results of the Remedial Investigation (RI) to the appropriate standards, criteria and guidance values (SCGs) for the identified land use and the unrestricted use SCGs for the site contaminants is available in the RI Report.

SECTION 5: ENFORCEMENT STATUS

The voluntary cleanup agreement is with a responsible party. The agreement requires the party to

address on-site and off-site contamination. Accordingly, no enforcement actions are necessary.

The Department and Niagara Mohawk (subsequently acquired by National Grid) entered into a Consent Order D0-0001-0011 on January 25, 2002. The Order obligates the responsible party to implement a full remedial program.

SECTION 6: SITE CONTAMINATION

6.1: Summary of the Remedial Investigation

A remedial investigation (RI) serves as the mechanism for collecting data to:

- characterize site conditions;
- determine the nature of the contamination; and
- assess risk to human health and the environment.

The RI is intended to identify the nature (or type) of contamination which may be present at a site and the extent of that contamination in the environment on the site, or leaving the site. The RI reports on data gathered to determine if the soil, groundwater, soil vapor, indoor air, surface water or sediments may have been contaminated. Monitoring wells are installed to assess groundwater and soil borings or test pits are installed to sample soil and/or waste(s) identified. If other natural resources are present, such as surface water bodies or wetlands, the water and sediment may be sampled as well. Based on the presence of contaminants in soil and groundwater, soil vapor will also be sampled for the presence of contamination. Data collected in the RI influence the development of remedial alternatives. The RI Report is available for review in the site document repository and the results are summarized in section 6.3.

The analytical data collected on this site includes data for:

- groundwater
- soil
- sediment
- soil vapor

6.1.1: Standards, Criteria, and Guidance (SCGs)

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

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

6.1.2: RI Results

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

Benzene	Benzo[k]fluoranthene
Toluene	Indeno(1,2,3-CD)pyrene
Ethylbenzene	Chrysene
Xylenes (mixed)	Dibenz[a,h]anthracene
Acenaphthene	Fluoranthene
Acenapthylene	Fluorene
Anthracene	Naphthalene
Benzo(a)anthracene	Phenanthrene
Benzo(a)pyrene	Pyrene
Benzo(b)fluoranthene	Coal Tar

The contaminant(s) of concern exceed the applicable SCGs for:

- groundwater
- soil

6.2: Interim Remedial Measures

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

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

6.3: Summary of Environmental Assessment

This section summarizes the assessment of existing and potential future environmental impacts presented by the site. Environmental impacts may include existing and potential future exposure pathways to fish and wildlife receptors, wetlands, groundwater resources, and surface water. The RI Report presents a detailed discussion of any existing and potential impacts from the site to fish and wildlife receptors.

Nature and Extent of Contamination: Based upon investigations conducted to date, the primary contaminants of concern at the site include benzene, ethylbenzene, toluene, xylene (BTEX) and polycyclic aromatic hydrocarbons (PAHs) which are impacting the soil and groundwater. No other VOCs, SVOCs, metals or PCBs/pesticides than those identified below were found in soil,

groundwater or sediment at levels exceeding restricted residential soil cleanup objectives (RRSCO), groundwater standards or sediment cleanup criteria.

Soil - Non-aqueous phase liquid (NAPL) in the form of coal tar has been identified at subsurface locations across the site and on some off-site properties to the north and east of the site. BTEX associated with the coal tar are found in the soil with a maximum concentration of 1,721 parts per million (ppm). Total PAHs are present in the soil up to 17,860 ppm. Specific contaminants detected above the applicable soil cleanup objectives (SCOs) on-site include: Acenaphthene up to 430 ppm, acenaphthylene up to 460 ppm, anthracene up to 920 ppm, fluoranthene up to 2,000 ppm, fluorene up to 710 ppm, naphthalene up to 4,600 ppm, phenanthrene up to 3,200, and pyrene up to 1,300 ppm, as compared to their RRSCO of 100 ppm; benzo(a)anthracene up to 660 ppm, benzo(a)pyrene up to 580 ppm, and benzo(b)fluoranthene up to 460 ppm, as compared to their RRSCO of 1 ppm; benzo(k)fluoranthene up to 460 ppm (RRSCO of 3.9 ppm), ideno(1,2,3-cd)pyrene up to 290 ppm (RRSCO of 0.5 ppm), chrysene up to 590 ppm (RRSCO of 3.9 ppm), and dibenz(a,h)anthracene up to 100 ppm (RRSCO of 0.33 ppm).

Specific contaminants detected above residential SCOs (RSCO) off-site include: Benzo(a)anthracene up to 77 ppm, benzo(a)pyrene up to 64 ppm, benzo(b)fluoranthene up to 22 ppm, benzo(k)fluoranthene up to 27 ppm, and chrysene up to 74 ppm, as compared to their RSCO of 1 ppm; fluoranthene up to 130 ppm, naphthalene up to 600 ppm, phenanthrene up to 150 ppm, and pyrene up to 190 ppm, as compared to their RSCO of 100 ppm; dibenz(a,h)anthracene up to 6.3 ppm (RSCO of 0.33 ppm), and indeno(1,2,3-c,d)pyrene up to 21 ppm (RSCO of 0.5 ppm). Off-site contamination was encountered to the north and east of the site at depths greater than 10 feet.

Groundwater - Benzene up to 10,000 ppb (SCG of 1 ppb), toluene up to 64 ppb (SCG of 5 ppb), ethylbenzene up to 2,100 ppb (SCG of 5 ppb) and xylene up to 1,600 ppb (SCG of 5 ppb)(BTEX), PAHs including naphthalene up to 2,500 (SCG of 10 ppb) and total cyanide up to 320 ppb (SCG of 200 ppb) have been detected above standards, criteria, and guidance values (SCGs) in overburden groundwater on- and off-site.

Benzene up to 1,500 ppb (SCG of 1 ppb), toluene up to 3,500 ppb (SCG of 5 ppb), ethylbenzene up to 1,600 ppb (SCG of 5 ppb) and xylene up to 1,900 ppb (SCG of 5 ppb) and PAHs including naphthalene up to 2,200 ppb (SCG of 10 ppb) have been detected above SCGs in bedrock groundwater on- and off-site.

Sediment - No concentrations of BTEX were detected above applicable SCGs in shallow sediment samples collected in the adjacent stream. Relatively low concentrations of PAHs, with total PAH concentrations ranging from 2.8 to 15 ppm, were found in the sediment. However, upstream PAH concentrations are slightly higher than those adjacent to the site, which indicates that these concentrations are associated with an urban setting and are not site-related. Coal tar was not observed in sediment.

Soil Vapor – Soil vapor samples were collected off-site, adjacent to nearby structures, to evaluate whether MGP-related contaminants were present in soil vapor. The results of the soil vapor sampling did not detect MGP-related contaminants off-site. The potential exists for MGP-related contaminants to be present in on-site soil vapor.

6.4: Summary of Human Exposure Pathways

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

Contaminated groundwater at the site is not used for drinking or other purposes and the site is served by a public water supply that obtains water from a different source not affected by this contamination. People are not expected to come into contact with the contaminated soil unless they dig below the surface. Volatile organic compounds in the groundwater may move into the soil vapor (air between soil particles), which in turn may move into overlying buildings and affect the indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. The site is currently unoccupied and used as a parking lot. However, the potential exists for people to inhale site contaminants in indoor air due to soil vapor intrusion in any future on-site buildings which are developed and occupied. Environmental sampling indicates soil vapor intrusion is not a current concern for off-site buildings.

6.5: Summary of the Remediation Objectives

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

The remedial action objectives for this site are:

Groundwater

RAOs for Public Health Protection

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

RAOs for Environmental Protection

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

Soil

RAOs for Public Health Protection

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

RAO for Environmental Protection

- Prevent migration of contaminants that would result in groundwater or surface

water contamination.

Soil Vapor

RAO for Public Health Protection

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

SECTION 7: ELEMENTS OF THE SELECTED REMEDY

The alternatives developed for the site and the evaluation of the remedial criteria are presented in the Alternative Analysis Report. The remedy is selected pursuant to the remedy selection criteria set forth in DER-10, Technical Guidance for Site Investigation and Remediation.

The selected remedy is referred to as the Source Removal, Cover System and Institutional Controls remedy.

The elements of the selected remedy, as shown in Figure 2, are as follows:

1. Remedial Design

A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows;

• Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;

• Reducing direct and indirect greenhouse gases and other emissions;

• Increasing energy efficiency and minimizing use of non-renewable energy;

• Conserving and efficiently managing resources and materials;

• Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;

• Maximizing habitat value and creating habitat when possible;

• Fostering green and healthy communities and working landscapes which balance ecological, economic and social goals; and

• Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.

2. Excavation and/or In Situ Solidification

Excavation and off-site disposal of the structure and contents of the former Manufactured Gas Plant (MGP) holders and the former tar well structure and contents, and contaminated soils on the former MGP property meeting the following criteria:

• visible tar or oil (i.e., tar coated or tar saturated) in material with total PAHs over 500 ppm.

The tar well and former holders will be excavated to depths up to thirteen (13) feet below ground surface (bgs). Approximately 2,300 cubic yards of soil will be removed from the site and disposed off-site. Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) for restricted-residential use will be brought in to complete the backfilling and establish the designed grades at the site.

A pre-design investigation will be conducted in the area immediately north of the northern gas holder and tar well to further evaluate the potential for non-aqueous phase liquid (NAPL) to migrate (i.e., the presence of tar coated or tar saturated material). Based on the results of this investigation, this area will be addressed, if determined necessary, by excavation and off-site disposal and/or in-situ solidification (ISS). ISS is a process that binds the soil particles in place creating a low permeability mass. The soil is mixed in place together with solidifying agents (typically Portland cement) or other binding agents using an excavator or augers. The soil and binding agents are mixed to produce a solidified mass resulting in a low permeability monolith. The treatment zone will extend to the top of till (approximately 20 feet below grade) in areas where NAPL that has the potential to migrate is present. The solidified mass will then be covered with a cover system as described in element 4 to prevent direct exposure to the solidified mass and protect it from freeze-thaw cycles. The resulting solid matrix reduces or eliminates mobility of contamination and reduces or eliminates the matrix as a source of groundwater contamination.

To facilitate implementation of ISS, if determined necessary, the top four feet of soil, plus additional material to account for expansion of the ISS material, will be excavated. Soil will be excavated and either stockpiled for re-use on-site or disposed off-site. Soil which does not exceed SCOs for restricted residential use and the protection of groundwater may be stockpiled to backfill the on-site excavation or to construct the site cover, to the extent that a sufficient volume of off-site soil is available.

For any off-site excavation determined necessary during the PDI, clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) for residential use and protection of groundwater will be brought in to complete the backfilling of the off-site excavation and establish the designed grades at the off-site properties.

3. Cover System

A site cover will be required to allow for restricted residential use of the site. The cover will consist either of the existing asphalt pavement, structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper two feet of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where the soil cover is required it will be a minimum of two feet of soil, meeting the SCOs for cover material as set forth

in 6 NYCRR Part 375-6.7(d) for restricted residential use. The soil cover will be placed over a demarcation layer with the upper six inches of the soil of sufficient quality to maintain a vegetation layer. Any fill material brought to the site will meet the requirements for the identified site use as set forth in 6 NYCRR Part 375-6.7(d).

A thicker site cover will be required in areas where ISS (if deemed necessary) is performed to protect the solidified soils from freeze-thaw cycles. These areas will be restored to existing grade and the cover will consist of a minimum of four feet of soil meeting the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d) for residential use. Implementation of this requirement will be subject to a site management plan and an agreement with the off-site property owner(s). An off-site site management plan and an agreement with the off-site property owner(s) will not be required if impacted off-site soil is removed and residential SCOs are met.

4. Institutional Control

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

a. requires the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8(h)(3);

b. allows the use and development of the controlled property for restricted residential, commercial and industrial uses as defined by Part 375-1.8(g), although land use is subject to local zoning laws;

c. restricts the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County DOH;

d. requires compliance with the Department approved Site Management Plan.

5. Site Management Plan

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

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

Institutional Controls:

a. The environmental easement discussed in remedial element #5 above.

b. An agreement with the off-site property owner(s) to implement the remedy and necessary future site management plan on the off-site property.

Engineering Controls: The site cover and solidified soils (if deemed necessary) discussed above

This plan includes, but may not be limited to:

• an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;

• descriptions of the provisions of an environmental easement including any land use, and/or groundwater use restrictions;

•a provision for evaluation of the potential for soil vapor intrusion for any buildings developed on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;

• provisions for the management and inspection of the identified engineering controls;

• maintaining site access controls and Department notification; and

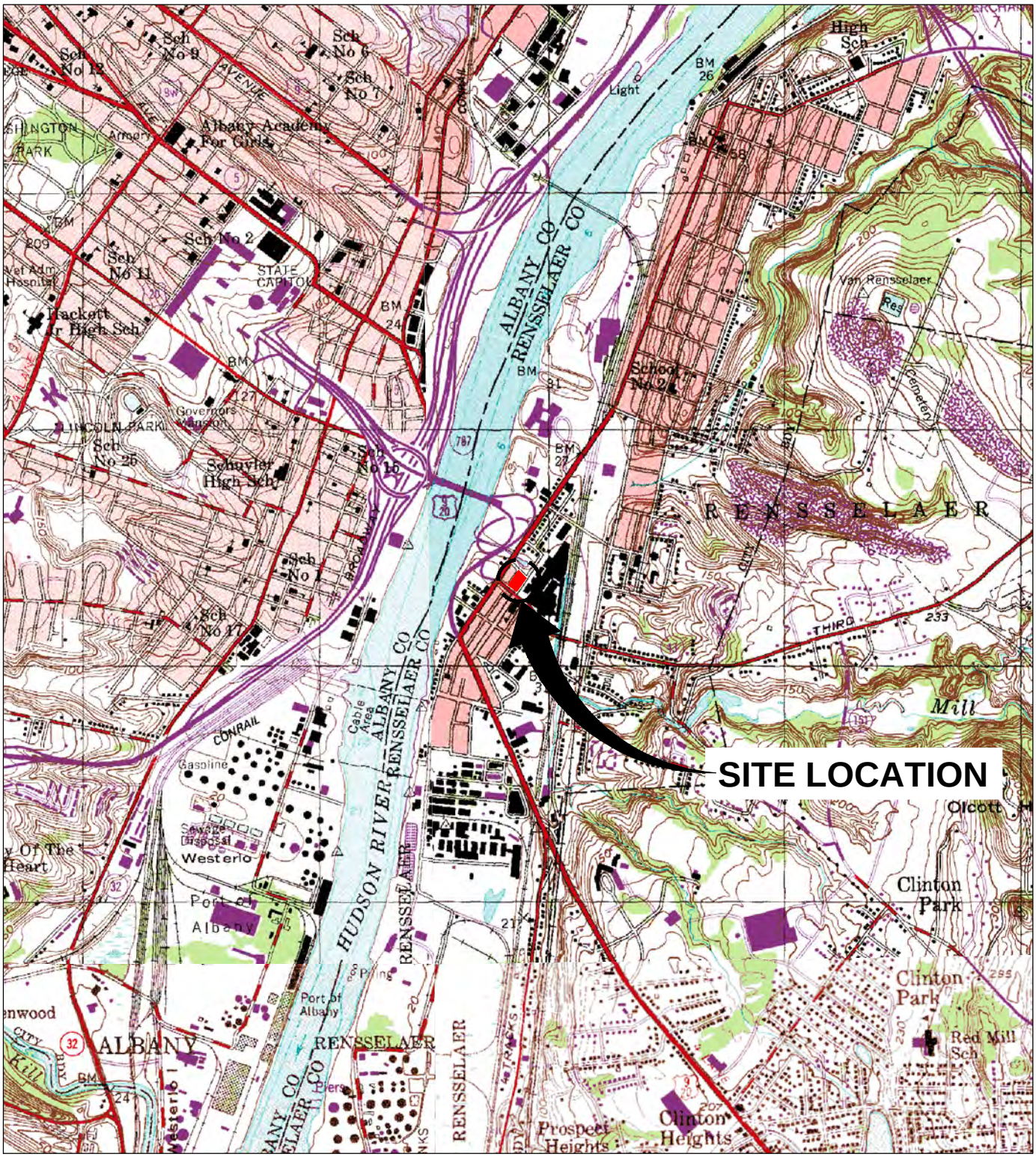
• the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.

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

• monitoring of groundwater and NAPL to assess the performance and effectiveness of the remedy;

• a schedule of monitoring and frequency of submittals to the Department; and

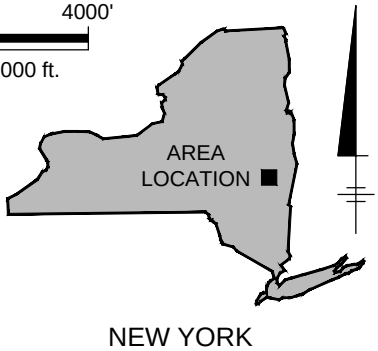
•monitoring for vapor intrusion for any buildings developed on the site, as may be required by the Institutional and Engineering Control Plan discussed above.



REFERENCE: BASE MAP USGS 7.5. MIN. TOPO. QUAD., ALBANY, TROY SOUTH, DELMAR & EAST GREENBUSH, NEW YORK, 1953, PHOTOREVISED 1980.

0 2000' 4000'

Approximate Scale: 1 in. = 2000 ft.



NATIONAL GRID
RENSSELAER NON-OWNED FORMER MGP SITE
RENSSELAER, NEW YORK
DECISION DOCUMENT

SITE LOCATION MAP

ARCADIS

FIGURE
1

CITY: SYRACUSE NY DIV/GROUP: ENVCAD DB: E. KRAHMER LD:(Opt) PIC: T. YOUNG PM/TM: J. GOLUBSKI TR: M. KISER LYR:(Opt)ON=*;OFF=*REF*
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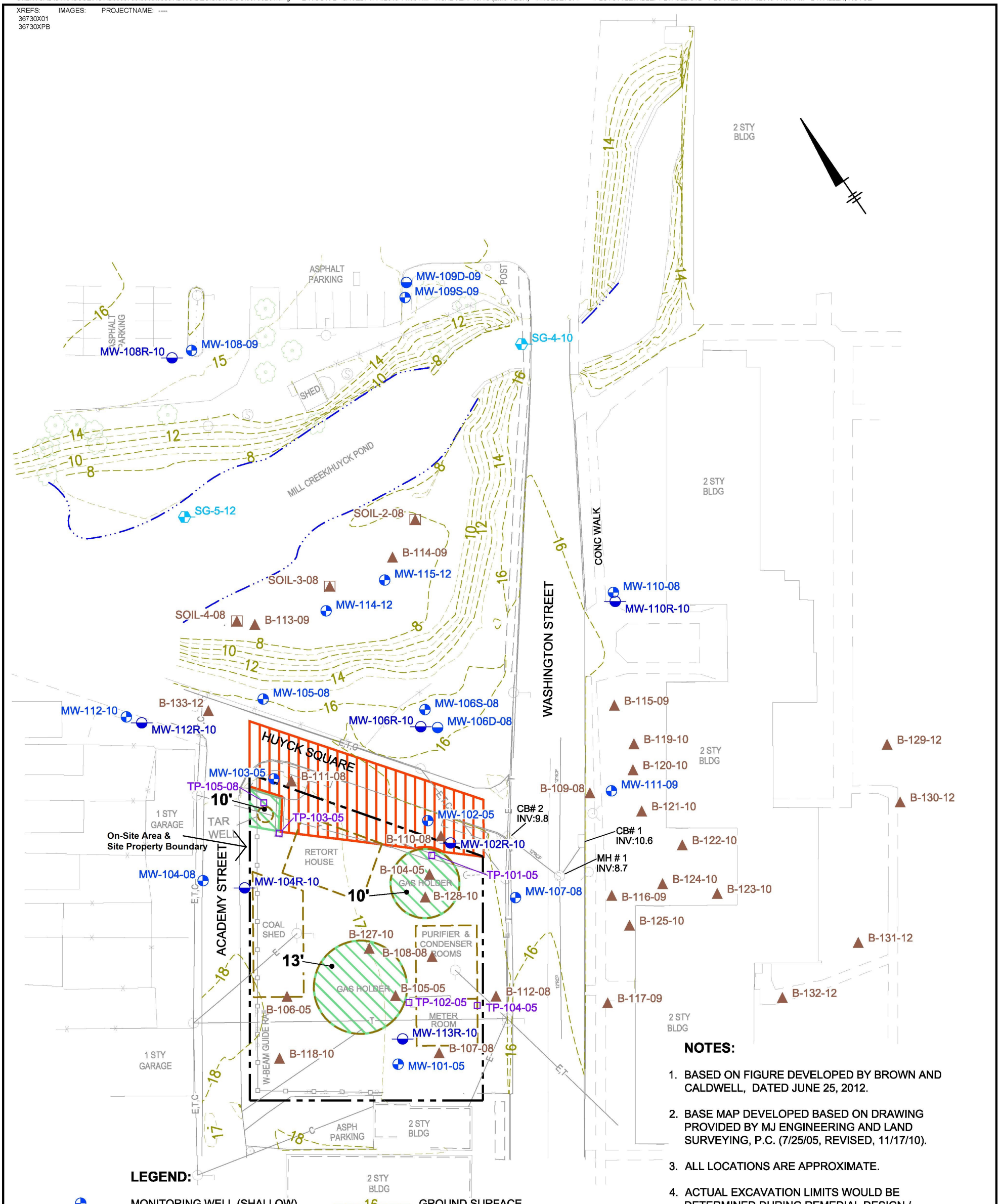

NOTES:

1. BASED ON FIGURE DEVELOPED BY BROWN AND CALDWELL, DATED JUNE 25, 2012.
2. BASE MAP DEVELOPED BASED ON DRAWING PROVIDED BY MJ ENGINEERING AND LAND SURVEYING, P.C. (7/25/05, REVISED, 11/17/10).
3. ALL LOCATIONS ARE APPROXIMATE.
4. ACTUAL EXCAVATION LIMITS WOULD BE DETERMINED DURING REMEDIAL DESIGN / REMEDIAL ACTION.
5. IN ADDITION TO REMOVAL, ALTERNATIVE 2 INCLUDES INSTITUTIONAL CONTROLS, GROUNDWATER AND NAPL MONITORING, AND PASSIVE NAPL RECOVERY, AS NECESSARY, AND A SITE MANAGEMENT PLAN, (AND AN ISS CONTINGENCY).

0 50' 100'
GRAPHIC SCALE

LEGEND:

- MONITORING WELL (SHALLOW)
- MONITORING WELL (DEEP)
- MONITORING WELL (BEDROCK)
- STAFF GAUGE
- SOIL BORING
- HAND AUGER BORING
- PDI AREA
- APPROXIMATE HORIZONTAL EXCAVATION LIMITS
- 10' EXCAVATION DEPTH
- TEST PIT
- PAVEMENT EDGE
- 16 GROUND SURFACE
- PROPERTY LINE
- FORMER MGP STRUCTURE LOCATION. LOCATIONS ARE APPROXIMATE BASED ON 1909 SANBORN MAP.
- SEWER MANHOLE
- UTILITY POLE
- LIGHT POLE
- HYDRANT
- T OVERHEAD TELEPHONE
- E OVERHEAD ELECTRIC
- C OVERHEAD CABLE
- 12"RCP SEWER LINE

NATIONAL GRID
RENSSELAER NON-OWNED FORMER MGP SITE
RENSSELAER, NEW YORK
DECISION DOCUMENT

ALTERNATIVE 2 - SOURCE AREA REMOVAL

ARCADIS

FIGURE
2