AMENDED RECORD OF DECISION

Former Rome Cable Site
Rome, Oneida County
New York State
Site Number 633073

July 2019

Prepared by the:

Division of Environmental Remediation
New York State Department of Environmental Conservation

DECLARATION STATEMENT – AMENDED RECORD OF DECISION

Former Rome Cable Site
City of Rome, Oneida County
No. 633073
July 2019

Statement of Purpose and Basis

The Amended Record of Decision (AROD) presents the selected remedy for the Former Rome Cable Site, a Class 2 inactive hazardous waste disposal site. The selected remedial program was chosen in accordance with the New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR) Part 375, and is not inconsistent with the National Oil and Hazardous Substances Pollution Contingency Plan of March 8, 1990 (40CFR300), as amended.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the site and the public's input on the Proposed Amendment to the ROD presented by the Department. A listing of the documents included as a part of the Administrative Record is included in Appendix B of the AROD.

Description of Selected Remedy

The elements of the amended remedy are as follows:

- Demolition of existing structures.
- Excavation and off-site disposal of soils exceeding protection of groundwater soil cleanup objectives (SCOs). Placement of backfill meeting the requirements of 6 NYCRR Part 375.6(d).
- Consolidation and off-site disposal of surface and demolition debris to permitted facilities.
- Site cover will consist of either existing foundations or minimum of 1-foot of soil cover to support future commercial use.
- A Site Management Plan (SMP) will be implemented as part of the amended remedy to continue appropriate site monitoring and IC/ECs at the site.

New York State Department of Health Acceptance

The NYSDOH concurs that the amendment to the remedy for this site is protective of human health.

Declaration

The selected remedy is protective of public health and the environment, complies with State and Federal requirements that are legally applicable or relevant and appropriate to the remedial action to the extent practicable, and is cost effective. This remedy utilizes permanent solutions and alternative treatment or resource recovery technologies, to the maximum extent practicable, and satisfies the preference for remedies that reduce toxicity, mobility, or volume as a principal element.

July 31, 2019
Date

Michael J. Ryan, P.E., Director
Division of Environmental Remediation

RECORD OF DECISION
AMENDMENT
FORMER ROME CABLE SITE

City of Rome / Oneida County / Registry No. 633073 July 2019

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

SECTION 1: PURPOSE AND SUMMARY OF THE RECORD OF DECISION AMENDMENT

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), is selecting an amendment to the Record of Decision (ROD) for the above referenced site. The disposal of hazardous wastes at this site, as more fully described in the original ROD document and Section 6 of this document, has caused the contamination of various environmental media. The Amended ROD is intended to attain the remedial action objectives identified for this site for the protection of public health and the environment. This amendment identifies the new information which has led to this selected amendment and discusses the reasons for the preferred remedy.

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

On March 30, 2013 the New York State Department of Environmental Conservation (Department) issued two Records of Decision (RODs) which selected remedies to clean-up the Former Rome Cable Site (Site), referred to as Operable Units (OU) 1 and OU-2 under the Environmental Restoration Program (Site #E633073). An updated assessment of the condition of the site buildings identified the need to demolish the building complex to implement the selected remedy. Including this demolition work into the remedy adds significant cost to the original remedy. The abandoned buildings are either partially or fully dilapidated and contain universal wastes (i.e., lighting ballasts, instrumentation switches, impacted wood block flooring), drummed waste, above-ground storage tanks (ASTs) within a flooded basement, and asbestos-containing materials. The condition of the buildings inhibits access for further delineation of potential impacts within and underlying the foundations. Several municipal utilities run under the existing slabs and are connected to sump and drainage features within the buildings. After the demolition, the sub slab utility corridors will be abandoned and sub-slab conditions will be further evaluated. The expanded scope of building demolition and utility abandonment adds significant cost to the project, prompting this selected amendment to the 2013 RODs.

The Site was redefined to comprise only those areas requiring remediation based on an evaluation

of sampling data and was added to the New York State Registry of Inactive Hazardous Waste Disposal Sites as a class 2 site on February 27, 2019. The redefined site generally corresponds to former operational building and the area surrounding former operations that are impacted by surface debris and contaminated soils.

SECTION 2: CITIZEN PARTICIPATION

The Department sought input from the community on this selected ROD Amendment. The information here is a summary of what can be found in greater detail in reports that have been placed in the Administrative Record for the site. The public is encouraged to review the reports and documents, which are available at the following repositories:

South Rome Senior Center
112 Ridge Street
Rome, New York 13440
Phone: (315) 339-6457

Or

Lisa A. Gorton, P.E., Project Manager
NYS Dept. of Environmental Conservation
Division of Environmental Remediation
lisa.gorton@dec.ny.gov
Phone: (518) 402-9574

A public comment period was open from May 1, 2019 to June 11, 2019 to provide an opportunity for the public to comment on these selected changes. A public meeting was held on May 15, 2019 at the South Rome Senior Center At the meeting, a description of the original ROD and the circumstances that led to selected changes in the ROD were presented. Responses to public question and answers are provided as Appendix A to this document. The Department's responses to additional written comments received from Arconic (a/k/a Alcoa) dated June 11, 2019 are incorporated into the administrative record.

This ROD Amendment is the Department's final selection of the remedy for the site.

Receive Site Citizen Participation Information by Email

Please note that the Department's Division of Environmental Remediation (DER) is "going paperless" relative to citizen participation information. The 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 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

The Former Rome Cable site is 19 acres in size and located in the City of Rome, Oneida County, New York. The site is located on the southwestern side of the City of Rome, between Erie Boulevard to the north and the Erie Canal to the south. The site is located south of Henry Street and the Rome Strip Steel Corporation, west of Jay Street and east of a former railroad line. The site location and boundaries are shown on Figures 1 and 2, respectively.

Site Features: The western portion of the site contains unoccupied site buildings consisting of Building 29 (the former horizontal insulation extrusion line) and Building 3 (a barn used for storage). The area surrounding the buildings is heavily vegetated and slopes toward the northeast. The northern and eastern portions of the site are where the former manufacturing operations occurred, including the manufacturing, coating, storing and shipping of wire. The eastern portion of the site, includes former Building 13 (storage), Building 17 (dry plastic resin storage hoppers and shipping), Building 20 (wire spooling and insulation extrusion), Building 22 (warehouse and shipping), Building 24 (storage), Building 25 (basement plasticizer storage tanks, first floor dry plastic resin rail car receiving) Building 28C (horizontal insulation extrusion line), and Building 29 (insulation extrusion line production).The southern and southeastern areas are covered with broken asphalt pavement, roads, and rail lines that were used for storing and shipping wire reels. Surface debris covers the area inside and outside of the buildings. The buildings are unoccupied and condemned. Perimeter gate and fencing is installed along the South Jay Street property boundary.

Groundwater is present at depths of 3 to 10 feet beneath the site. Groundwater flow is from the northeast to the southwest. The aquitard at the base of the overburden aquifer is present at maximum depth of 44 feet below ground surface and is composed of a glacio-lacustrine gray clay and silt. Shallow groundwater beneath the site discharges to wetlands located to the south and west which ultimately drains to Wood Creek.

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. The Former Rome Cable site is currently zoned for commercial use and is in an area of commercial and industrial use.

For this site, the selected remedy restricts the use of the site to commercial use (which allows for industrial use) as described in Part 375-1.8(g).

SECTION 5: ENFORCEMENT STATUS

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

The site is currently owned by the Oneida County Industrial Development Authority (OCIDA). Historically, the site was owned and/or operated by Rome Cable, H.T. Dyett, a former subsidiary

of Arconic (f/k/a Alcoa), Cyprus Mines Corporation, and several private investors and corporations. Since viable PRPs have been identified, legal action has been initiated by the State to recover State response costs. The State Superfund Classification Notice fact sheet was issued to the public for review on April 17, 2019.

SECTION 6: SITE CONTAMINATION

6.1: 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.

Based upon the resources and pathways identified and the toxicity of the contaminants of ecological concern at this site, a Fish and Wildlife Resources Impact Analysis (FWRIA) was deemed not necessary.

The interior of the Building Complex is in a deteriorated state and mold, asbestos, and lead paint conditions are present. Portions of the floor and roof sections have deteriorated or partially collapsed, and exposure to the elements may create a potential run-off through subsurface drainage features. Exposed debris within the interior of the buildings has the potential to drain to both surface and groundwater. This condition of the site buildings was not addressed in the original ROD(s).

Based upon the remedial investigation conducted, seven areas of concern have been identified within the site boundary (formerly OU-1 and OU-2 operations). The two areas of concern in OU-1 (western portion of the site) include the PCB-impacted area and the horizontal wire coating drip line area. Impacts to soils above commercial SCOS were confirmed in 2018, excavated to below a commercial SCO and backfilled. One additional area of surface debris, including remnants debris and interior plasticizer vats within Building 29 were added as an area of concern. No groundwater contamination has been documented within this area.

Five areas of concern were identified within the eastern portion of the site. These areas include the main manufacturing buildings, the phthalate impacted area, the petroleum impacted area, the acetone impacted area, and the demolitions debris areas (piles). The primary contaminants of concern in the soil are VOCs and SVOCs. No groundwater contamination was observed in the 2018 sampling event.

Groundwater beneath the site flows to the south and west into undeveloped and uninhabited areas. Residents in this area are supplied with municipal water.

6.2: Interim Remedial Measures

An IRM is conducted at a site when a source of contamination or exposure pathway can be

effectively addressed before issuance of the Record of Decision.

Although IRMs were not performed on this site, some preliminary remedial action work was completed under OCIDA's Environmental Restoration Program (ERP) during the period from December 2018 through April 2019. The site activities included the removal of above ground storage tanks; excavation and backfill of SVOC and PCB-impacted surface soils located northwest of Building 29; and installation of perimeter site fencing. These activities were deemed necessary upon completion of the Pre-Design Investigation Work. Approximately 300 cubic yards of PCB and SVOC impacted soils were excavated and disposed off-site. Post-excavation confirmatory sampling indicated that remaining soils meet soil cleanup objectives for commercial use.

6.3: 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.

The site was not initially fenced and persons who enter this area could contact contaminants in the soil by walking on the soil, digging, or unauthorized access to the buildings. The buildings on-site are condemned and contain asbestos-containing materials. In February 2019, perimeter security fence and gates were installed to inhibit access to the site.

Groundwater 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.

Volatile organic compounds in the soil or groundwater may move into the soil vapor (air spaces within the soil), which in turn may move into overlying buildings and affect the indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. The potential exists for the inhalation of site contaminants due to soil vapor intrusion for any future on-site redevelopment and occupancy for this site. Off-site soil vapor intrusion was evaluated and is being addressed as part of the remediation of the adjacent off-site Former Rome Cable Site (site #E633053). Potential for sub-slab vapor impacts resulting from potential pathways underlying the existing buildings will be further evaluated after demolition of the building structures and prior to any future development.

SECTION 7: SUMMARY OF ORIGINAL REMEDY AND AMENDED REMEDY

7.1 Original Remedy

The combined elements of the selected remedies for OU-1 and OU-2 are as follows:

1. Remedial Design (OU-1 and OU-2). A remedial design program will be implemented to provide the details necessary for the construction, operation, 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 gas 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 (OU-1 and OU-2). On-site soils which exceed protection of groundwater soil cleanup objectives (SCOs) will be excavated and transported off-site for disposal at a permitted facility. Backfill 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). Soil will be excavated to address the identified contaminants from the following areas, as shown on Figure 3:
    - Approximately 260 cy of petroleum impacted soils from the petroleum area of concern in the vicinity of Building 20;
    - Approximately 480 cubic yards of Phthalate impacted soils will be removed from the phthalate impacted AOC south of Building 17;
    - Approximately 800 cy of PCB contaminated soils will be removed from the areas west of Building 29. This area is on the northwest side of OU-1 and Parcel 5; and
    - Approximately 600 cy of petroleum contaminated soil in the vicinity of the horizontal wire containing drip line will be removed from the area between Building 28C and 29. This area is on the northeast side of OU1 and Parcel 5.

3. Consolidation Debris from OU-1 and contaminated soils impacted with SVOCs above commercial use SCOs identified in the Demolition Debris Fill AOC will be consolidated and covered by the soil cover. The consolidated material will be covered with sufficient backfill to allow placement of the demarcation layer and soil cover.

4. Site Cover (OU-1 and OU-2). A site cover will be required to allow for commercial use of the site. The cover will consist either of the structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper one foot of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where the soil cover is required it will be a minimum of one foot of soil, meeting the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d) for commercial 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).

5. Treatment (OU-2). The acetone contamination found in the soil beneath the parking lot in the

vadose zone of the acetone impacted AOC will be biologically treated through mechanical aeration. A pilot test will be conducted in this AOC to evaluate the best method to mechanically aerate the acetone impacted soils found beneath the parking lot and other barrier material (i.e., concrete). The full-scale operation will commence following the pilot test. The operation of the components of the remedy would continue until the remedial objectives have been achieved, or until the Department determines that continued operation is technically impracticable or not feasible. Mechanical aeration will ensure that all visual, olfactory and photo-ionization detector readings are mitigated. Confirmation testing will be conducted to ensure that the protection of groundwater SCOs are achieved. A community air monitoring program will be implemented to ensure the protection of the community during the mechanical aeration process.

6. Waste Removal (OU-2)- All waste identified in on-site buildings of the main manufacturing buildings AOC will be characterized and disposed or recycled at approved and permitted off-site facilities, including, but not limited to, oil-containing transformers, paint containers, propane cylinders, fluorescent lights and ballasts, petroleum products, batteries, mercury containing devices, asbestos containing materials, oil soaked wood block flooring and phenolic compounds used in the wire coating process.

7. Institutional Control. Imposition of an institutional control in the form of an environmental easement for the controlled property that:
   - 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);
   - allows the use and development of the controlled property for commercial and industrial uses as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
   - 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;
   - prohibits agriculture or vegetable gardens on the controlled property; and
   - requires compliance with the Department approved Site Management Plan.

8. 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: The Environmental Easement discussed above. Engineering Controls: The soil cover discussed above.

7.2 Elements of the Remedy Already Performed

In December 2018, Pre-Design Remedial Action was taken to refine the area of PCB impacted soil within the OU-1 boundary. Based on the2018 soil sampling data, the original impacted areas (800 cy volume) was refined and adjusted to 300 cy. PCB impacted soils were excavated, transported, and disposed off-site. Confirmatory soil sampling was performed to confirm that soils meet the SCO for unrestricted use of less than 1 part per million (ppm) PCB prior to backfilling with crushed

gravel.

Within OU-2, as part of the waste removal activity, two above ground 20,000-gallon diesel storage tanks were abandoned, cleaned and transported off-site. The underlying soils will be addressed as part of the remaining remedial action.

Perimeter site fencing and security gates were installed along South Jay Street to inhibit immediate access to the site.

7.3 New Information

In 2012, the City of Rome condemned the site buildings, and access to complete the removal of asbestos containing materials, tanks and other potentially hazardous materials as required in Element 6 of the Record of Decision is no longer feasible. The condition of the buildings has deteriorated since the condemnation, and roof sections with asbestos-containing materials have collapsed, resulting in exposure of the interior building contents to the weather. Basement sections undergo frequent flooding and draining cycles with drainage to interior drain lines and sumps. `

The original site limits, as defined in the Records of Decision for Operable Units 1 and 2, comprised 50 acres. For the purposes of this amendment, OU-1 and OU-2 were combined and the site boundary is compressed to an area of 19.0 acres. The modified site boundary encompasses the area where former operations are shown to impact environmental media and no longer includes a large wetland area not impacted by site-related contamination. The new site boundary is presented on Figure 2. Further, the site has transitioned from the Department's Environmental Restoration Program and to the State Superfund Program. The site was referred to the Superfund Program in February 2019.

Supplemental soil and groundwater data were collected during the summer of 2018 to refine impacts within the PCB, Acetone-Impacted, and Petroleum Drip Line areas of concern. A data summary is provided in Exhibit A which corresponds to Figure 5. Changes to the remedy resulting from this sampling are described in Section 7.4.

7.4 Selected Changes to the Original Remedy

The selected change to the ROD is to incorporate the controlled demolition of the condemned structures since performing removal of asbestos containing materials, tanks and other potentially hazardous materials within the buildings as required in the ROD is no longer feasible. Interior features, such as; utilities; sumps; and drains will be abandoned in accordance with state regulations. Four interior tanks in the basement will be cleaned and removed After demolition and the utility features are stabilized, a sub-slab coring program will be performed to determine the condition of underlying soils. Soils exhibiting hazardous condition will be removed. Soils with concentrations exceeding commercial soil cleanup standards will be evaluated for either removal or site cover placement. Non-impacted concrete debris resulting from demolition will be visually inspected for staining and may be processed for re-use as backfill or site cover in accordance with DER-10. All other stained debris including but not limited to; wood block; metal; plastics; and

general refuse, will be transported off-site to a permitted disposal facility.

The OU-2 ROD identified the potential for acetone impacts in the soil beneath the parking lot in the vadose zone underlying approximately 13 acres of the site. does Acetone was identified above the un-restricted SCOs in 19 of the subsurface soil samples at concentrations ranging from .053 ppm to .420 ppm. These impacts were substantive to stipulate ROD requirement for additional data collection and potential treatment. As a PDI task, in 2018 supplemental sampling of the of the soils and groundwater were evaluated to confirm the boundary of soil impacts within the 13-acre acetone-treatment zone and define the groundwater impacts, as a requirement to design treatment alternatives (as necessary). Results of the 2018 data collection yielded concentrations below commercial cleanup of soils standard (500 ppm) the SCOs for confirmed no exceedances of the and protection of groundwater standard for Acetone (50 µg/L). A distribution of historical and 2018 Acetone data is shown on Figure 4. Based on the data distribution, it was determined that treatment for Acetone would not be required. A pre-demolition report (Arcadis, 2018) was prepared to document the condition and contents within the unoccupied structures.

A summary of the changes to the original ROD as amended in this document are shown in the Table on the following page:

SUMMARY OF REMEDY CHANGES
Former Rome Cable Site No. 663073 Record of Decision Amendment

Media:	March 2013 ROD	Amended ROD
Groundwater	(1) Treatment of Acetone impacted soils. (2) Evaluation of supplemental in-situ groundwater treatment in areas of highest contamination; (3) Long term monitoring; (4) Deed restriction restricting the use of ground water with treatment and approval.	Treatment of the Acetone-Impacted soils as required in the 2013 ROD, are no longer needed. Supplemental evaluation of the soils found existing concentration of acetone detected in groundwater are below the Class GA standard of 50 µg/L. Updated acetone-impacted environmental data is provided on Figure- 4. Long term monitoring and an institutional control to restrict the use of groundwater are unchanged; however, an environmental easement will be recorded on the property instead of a deed restriction.
Soil	Excavation. On-site soils which exceed commercial SCOs will be excavated and transported off-site for disposal. Soils will be excavated to address contaminants from the following areas: (a.) Approximately 260 cubic yards of petroleum (diesel) contaminated soils in the vicinity of Building 20, former storage of AST tank area. (b.) Approximately 480 cy of Phthalate-impacted soils in the vicinity of the loading area south of Building 17. (c.) Approximately 800 cy of PCB contaminated soils will be removed from the area west of Building 29. (d.) Approximately 600 cy of petroleum contaminated soil in the vicinity of the horizontal wire coating drip line will be removed from the area between	(1) Excavation limits were further refined as follows: (a.) Petroleum-impacted area remedy remains unchanged and about 260 cy of petroleum (diesel) contaminated soils in the vicinity of Building 20, former storage of AST tank area will be excavated. (b.) Phthalate-impacted area remedy remains unchanged and about 480 cy of phthalate impacted soil in the vicinity of the loading area south of Building 17 will be excavated. (c.) PCB-impacted soils were further assessed under the December 2018 Removal Action and determined that the extent of PCB contaminated soils needing to be excavated was 300 cy instead of the original estimate of 800 cy; approximately 300 cy of soils were excavated, transported and disposed off-site. No additional PCB soil impacts are expected from this area. (d.) Soil and groundwater impacts were further defined under the 2018 Investigation; and determined that the extent of SVOC impacted surface soils needed to be excavated for off-site disposal was 25 cy instead of the original estimate of 600 cy; approximately 25 cy of SVOC-

	Building 28C and 29. (2) Treatment. The acetone contamination found in the soil beneath the parking lot in the vadose zone of the acetone impacted AOC will be biologically treated through mechanical aeration. A pilot test will be conducted in this AOC to evaluate the best method to mechanically aerate the acetone impacted soils found beneath the parking lot and other barrier material (i.e., concrete). The full-scale operation will commence following the pilot test. (3) Deed restriction to limit use of property to industrial/commercial use to restrict exposure unless otherwise approved by the Department;	impacted surface soils were excavated and disposed off-site. The remainder of the drip line soils were found to have impacts below commercial SCOs and require no further action. (2.) Supplemental investigations completed in 2018 determined that no further action is required for the Acetone area as identified in the original remedy. Supplemental investigation completed in 2018 bounded soil impacts, confirmed that acetone is no longer in soil at concentrations which warrant remedial action and are protective of groundwater and below commercial SCOS. (3.) A Site Management Plan and Environmental Easement to will be placed on the property to limit the use of the property to industrial / commercial is still needed as was originally stated in the March 2013 ROD.
Soil Vapor/Indoor Air	Not included in original remedy	The potential for soil vapor intrusion will be addressed as part of the Site Management Plan to include a provision that a soil vapor intrusion evaluation will be conducted for any buildings constructed on-site in the future to include actions to address exposures if needed.
Other Media	(1) Waste Removal. All waste identified within and surrounding the buildings will be characterized and disposed or recycled at approved and permitted off-site facilities, including, but not limited to, oil-containing transformers, paint containers, propane cylinders, fluorescent lights and ballasts, petroleum products, batteries, mercury containing devices, asbestos containing materials, oil-soaked wood block flooring and phenolic compounds used in the wire coating process.	Since the buildings have been condemned and are unsafe for entry, workers are unable to remove waste from within or near the buildings as originally stated in the 2013 ROD. Buildings will be demolished and building material and other wastes will be removed for off-site disposal. Existing slabs will remain in place as cover where deemed appropriate and subsurface utilities abandoned. Surface debris within the site boundary will be consolidated for off-site disposal with the building debris. Interior wood block debris will be segregated and characterized for disposal

SECTION 8: EVALUATION OF CHANGES

8.1 Remedial Goals

Goals for the cleanup of the site were established in the original ROD and remain unchanged. The goals selected 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

- Remove the source of ground or surface water contamination.

Soil

RAOs for Public Health Protection

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

RAOs for Environmental Protection

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

Soil Vapor

RAOs for Public Health Protection

- Mitigate impacts to public health resulting from existing, or the potential for, soil vapor intrusion.

8.2 Evaluation Criteria

The criteria used to compare the remedial alternatives are defined in the regulation that directs the remediation of inactive hazardous waste sites in New York State (6 NYCRR Part 375). For each criterion, a brief description is provided. A detailed discussion of the evaluation criteria and comparative analysis is contained in the original Feasibility Study.

1. Protection of Public Health and the Environment. This criterion is an overall evaluation of each alternative's ability to protect public health and the environment. The remedy will eliminate existing and potential hazards associated with the building structures and underlying soils.

2. Compliance with New York State Standards, Criteria, and Guidance (SCGs). Compliance with SCGs addresses whether a remedy will meet environmental laws, regulations, and other standards and criteria. In addition, this criterion includes the consideration of guidance which the Department has determined to be applicable on a case-specific basis. The remedy amendment conforms 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 and 2018 PDI 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

3. Short-term Effectiveness. The potential short-term adverse impacts of the remedial action upon the community, the workers, and the environment during the construction and/or implementation are evaluated. The length of time needed to achieve the remedial objectives is also estimated and compared against the other alternatives.

The amended remedy will incorporate the demolition of the site structures which may impact the local community over a short -term with additional truck traffic and construction equipment. The activity will vary in intensity, depending on work progress and waste flow control. A community air monitoring plan (CAMP) will be implemented to monitor and control potential for air-borne contaminants during construction. Dust control and perimeter noise controls will be monitored during construction to protect the public and worker health. The contractor will maintain compliance with local ordinances.

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

The amended remedy will improve long term effectiveness and permanence. Demolition of the buildings will address the removal of hazardous debris loading existing within the buildings and potentially impacts to groundwater, surface water, and soils underlying the floor slabs. Access to the floor slabs after demolition will allow evaluation of the sub-slab soil, groundwater, and soil vapor conditions with potential migration pathways within and off-site.

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

The amended remedy will be more effective in removing the toxicity and mobility of waste sources associated with interior debris and will allow for the evaluation of soils underlying the foundations for potential impacts to groundwater or soil vapor. Demolition of the buildings will result in an increased volume of construction debris requiring disposal.

6. Implementability. The technical feasibility and administrative feasibility of implementing each alternative are evaluated. Technical feasibility includes the difficulties associated with the construction of the remedy and the ability to monitor its effectiveness. For administrative

feasibility, the availability of the necessary personnel and materials is evaluated along with potential difficulties in obtaining specific operating approvals, access for construction, institutional controls, and so forth.

In addition to the factors associated with the original remedy, the remedy will require permitting and variances under 12 NYCRR Part 56 - New York State Department of Labor Regulations related to the hazards to public safety and health during the removal of asbestos containing materials. These approvals are readily obtainable.

7. Cost-Effectiveness. Capital costs and annual operation, maintenance, and monitoring costs are estimated for each alternative and compared on a present worth basis. Although cost-effectiveness is the last balancing criterion evaluated, where two or more alternatives have met the requirements of the other criteria, it can be used as the basis for the final decision. The remedy amendment, although costlier, is required to implement remedy to meet compliance with New York State Guidance and ensure long term effectiveness.

8. **Community Acceptance.** Concerns of the community regarding the amendment were received throughout a public comment period. A responsiveness summary is attached to summarize questions and answers received during the public availability period. No significant changes to the remedy were required based on public comments.

SECTION 9: AMENDED REMEDY

The Department has amended the Record of Decision (ROD) for the Former Rome Cable Site. The changes to the selected remedy are summarized in Section 7.4 above.

The estimated present worth cost to carry out the amended remedy is $13,000,000. The estimated present worth to complete the original remedy was $1,630,000. The cost to construct the amended remedy is estimated to be $13,000,000.

The elements of the amended remedy listed below are identified as unchanged, modified or new when compared to the March 2013 of original ROD remedy:

1. Remedial Design. A remedial design program will be implemented to provide the details necessary for the construction, operation, 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. (unchanged)

2. Demolition. Demolition of buildings containing asbestos and contents which contain potentially hazardous materials. Since the buildings have been condemned and are unsafe for entry, workers are unable to remove waste from within or near the buildings as originally stated in the 2013 ROD. Buildings will be demolished and building material and other wastes will be removed for off-site disposal. (new)

3. Excavation. Excavation and off-site disposal of all on-site soils which exceed the protection of groundwater soil cleanup objectives (SCOs)Approximately 1200 cubic yards of impacted soils from the petroleum phthalate- impacted areas adjacent to Buildings 20 and 22 will be removed; Soils impacts noted in the OU-1 remedy were addressed as discussed in Section 7.2. On-site soil which does not exceed the above excavation criteria may be used below the cover system described in remedy element 4 to backfill the excavation. Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to complete the backfilling of the excavation and establish the designed grades at the site.;
(unchanged)

4. Site Cover. A site cover will be required to allow for commercial use of the site. The cover will consist either of the structures such as existing foundations, pavement, or a soil cover in areas where the upper one foot of exposed surface soil will exceed the commercial SCOs. A visual inspection of the existing foundation or pavement will be required to determine if these are impacted with site contaminants and are suitable for use as cover. Where the soil cover is required it will be a minimum of one foot of soil, meeting the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d) for commercial 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). (unchanged)

5. Waste Removal. Once buildings are demolished as indicated for Element 2, all waste identified in on-site buildings of the main manufacturing buildings will be characterized and disposed or recycled at approved and permitted off-site facilities, including, but not limited to, oil-containing transformers, paint containers, propane cylinders, fluorescent lights and ballasts, petroleum products, batteries, mercury containing devices, asbestos containing materials, oil soaked wood block flooring and phenolic compounds used in the wire coating process. (modified)

6. Institutional Control. Imposition of an institutional control in the form of an environmental easement for the controlled property that:

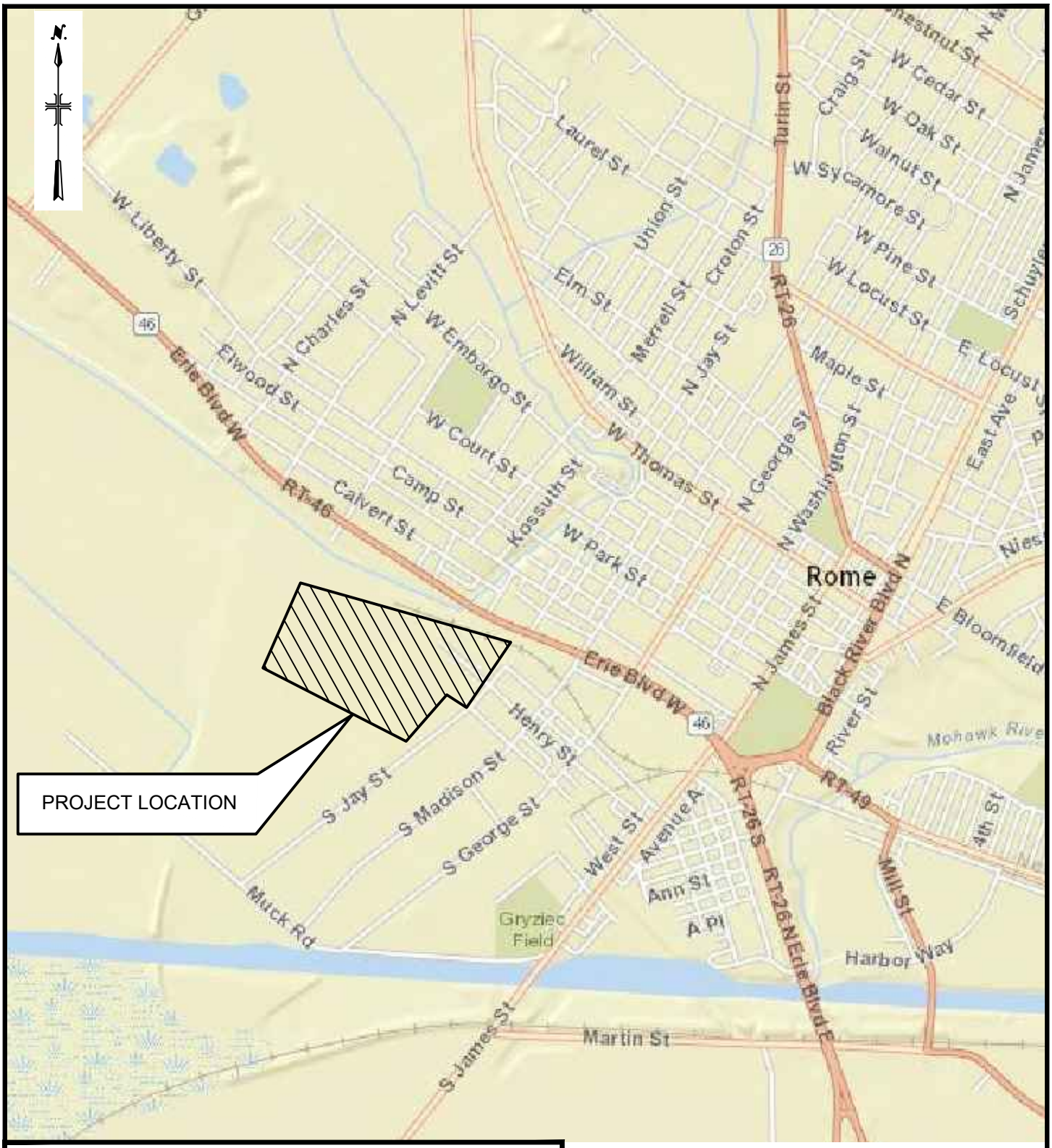
- requires the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
- allows the use and development of the controlled property for commercial and industrial uses as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- 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;
- prohibits agriculture or vegetable gardens on the controlled property; and
  requires compliance with the Department approved Site Management Plan.

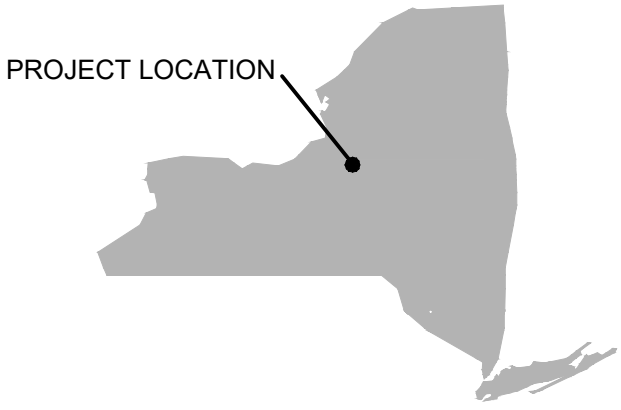
7. A Site Management Plan is required, which includes the following:

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:
• an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
• descriptions of the provisions of the environmental easement including any land use and 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 soil and groundwater to assess the performance and effectiveness of the remedy;
• a schedule of monitoring and frequency of submittals to the Department; monitoring for vapor intrusion for any buildings occupied or developed on the site, as may be required by the Institutional and Engineering Control Plan discussed in item above





0 1000' 2000'

APPROX. SCALE

FORMER ROME CABLE SITE
NYSDEC SITE NO. 633073

REMEDIAL ACTION PLAN AMENDMENT

SITE LOCATION PLAN

ARCADIS Design & Consultancy for natural and built assets

FIGURE 1

USER: HAUSMANN FILENAME: G:\ACAD\PROJ\00266431.0000\REMEDIAL ACTION PLAN AMENDMENT\FIGURE 1.DWG SAVE DATE: 12/21/2018 7:15 AM PLOT DATE: 12/27/2018 9:00 AM

Site Location
Figure 2

PHTHALATE REMOVAL AREA

BLDG. 17

BLDG. 25

BLDG. 20

BLDG. 22

HENRY STREET

SOUTH JAY STREET

BLDG. 24
(LIMITS OF FOUNDATION)

BLDG. 28C

DIESEL
REMOVAL AREA

BLDG. 13
(LIMITS OF
FOUNDATION)

LIMITS OF WORK (TYP.)

DRIP LINE CORRIDOR

WETLAND BOUNDARY
LINE (TYP.)

BLDG. 29

BLDG. 3

LEGEND

- DEMOLITION AREAS
- EXCAVATION AREAS
- SURFACE DEBRIS REMOVAL AREAS

0 200' 400'

FORMER ROME CABLE SITE
NYSDEC SITE NO. 633073
REMEDIAL ACTION PLAN AMENDMENT

PROPOSED REMEDIAL ACTION ELEMENTS

ARCADIS Design & Consultancy for natural and built assets

FIGURE 3

GP-24 [20] (6-10)
GP-25 [11] (6-10)
GP-08 [38] (2-4)
GP-26 [15] (6-10)
GP-22 [200] (6-10)
GP-10 [140] (2-4)
GP-20 [15] (6-10)
GP-09 [ND] (2-4)
GP-23 [16] (6-10)
GP-21 [46] (6-10)

24 (LIMITS OF FOUNDATION)
17
25
20
13 (LIMITS OF FOUNDATION)
28C
28A
22

B-01 [270] (4-6)
B-19-18 [<9.7 ug/L]
B-17-18 [<9.7 ug/L]
B-17-18 [<0.54] (10)
B-18-18 [<9.7 ug/L]
GP-02 [46] (4-6)
B-16-18 [<9.7 ug/L]
B-10 [21] (4-6)
B-20-18 [<19 ug/L]
GP-01 [ND] (4-6)
B-20-18 [0.076] (5)
GP-04 [190] (2-4)
B-15-18 [<9.7 ug/L]
B-07I [65] (6-9)
B-08-18 [<15 ug/L]
GP-08 [ND] (0-2)
GP-05 [30] (0-2)
B-09-18 [<9.7 ug/L]
B-08-18 [<0.021] (11)
B-14-18 [<9.7 ug/L]
B-13-18 [<9.7 ug/L]
B-10-18 [<9.7 ug/L]
B-03 [53] (10-12)
B-06-18 [0.03] (7)
B-07-18 [<9.7 ug/L]
GP-03 [7.5] (0-2)
B-06-18 [<9.7 ug/L]
GP-07 [68] (4-6)
B-05-18 [9.9 ug/L]
B-24 [59] (0-2)
B-01-18 [<0.026 mg/Kg] (4)
B-01-18 [13 ug/L]
B-12-18 [<19 ug/L]
B-11-18 [<9.7 ug/L]
B-02-18 [<9.7 ug/L]
B-01D [51] (4-6)
B-21 [290] (2-4)
B-04-18 [<9.7 ug/L]
B-03-18 [<19 ug/L]

HENRY STREET
SOUTH JAY STREET

N.

LEGEND

- BORING - ACETONE EVENTS
- DIRECT PUSH - ACETONE EVENTS
- GROUNDWATER ACETONE LEVELS (2018)
- SOILS ACETONE LEVELS (2018)
- PREVIOUS SOILS ACETONE LEVELS (2008)

STANDARD CLEANUP OBJECTIVES:

- FOR COMMERCIAL CLEANUP (SOIL): 500 ppm
- FOR PROTECTION OF GROUNDWATER (SOIL): 0.05 ppm
- FOR ACETONE IN GROUNDWATER: 50 ug/L

0 100' 200'
SCALE: 1" = 100'

FORMER ROME CABLE SITE
NYSDEC SITE NO. 633073
REMEDIAL ACTION PLAN AMENDMENT

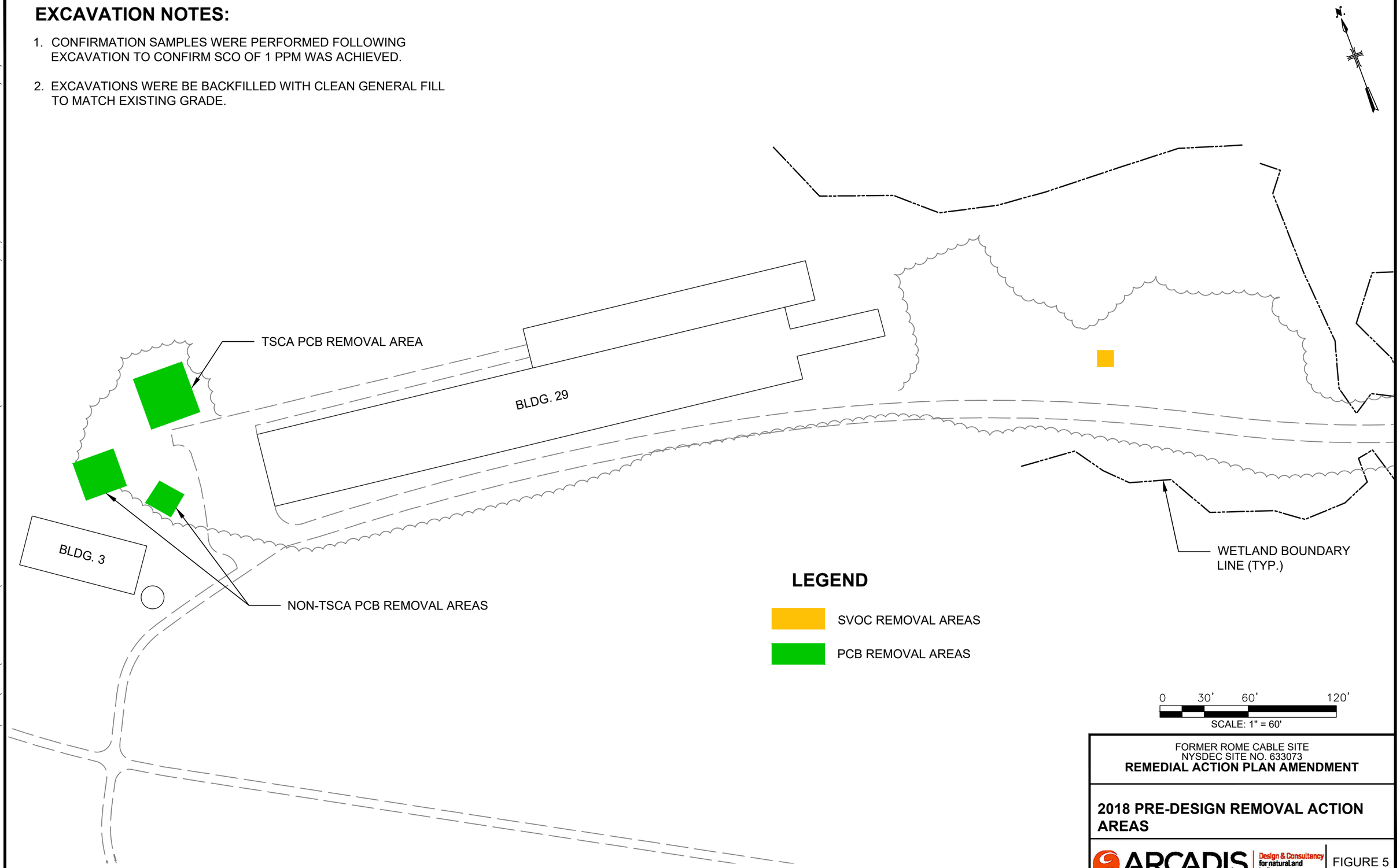
ACETONE IMPACTED AREA SAMPLING SUMMARY

ARCADIS Design & Consultancy for natural and built assets

FIGURE 4

EXCAVATION NOTES:

1. CONFIRMATION SAMPLES WERE PERFORMED FOLLOWING EXCAVATION TO CONFIRM SCO OF 1 PPM WAS ACHIEVED.
2. EXCAVATIONS WERE BE BACKFILLED WITH CLEAN GENERAL FILL TO MATCH EXISTING GRADE.



FORMER ROME CABLE SITE
NYSDEC SITE NO. 633073
REMEDIAL ACTION PLAN AMENDMENT

2018 PRE-DESIGN REMOVAL ACTION AREAS

ARCADIS Design & Consultancy for natural and built assets

FIGURE 5

LEGEND

- SURFACE SOIL SAMPLE (2009 EVENT)
- SOIL BORING (2008 EVENT)
- SOIL BORING (AUGUST 2018 EVENT)

[0.01] TOTAL SVOCs (mg/Kg)

NOTES:

1. ALL SAMPLES WERE COMPOSITE SAMPLES OBTAINED AT APPROXIMATELY 0-8 FEET BELOW GROUND SURFACE.
2. SVOC CONCENTRATIONS WERE SCREENED AGAINST ECOLOGICAL SOIL CLEANUP OBJECTIVES DUE TO PROXIMITY TO WETLAND BUFFER ZONES. NO REMOVAL ACTION DEEMED NECESSARY.
3. THIS AREA WAS SUBJECT TO 2018 SURFACE SOIL REMOVAL ACTION.

SS-47 (2)	
Benzo(a)pyrene	1.2 mg/Kg

SS-48 (2)	
Benzo(a)pyrene	2.7 mg/Kg
Dibenzo(a,h)anthracene	0.7 mg/Kg

SS-49 (2)	
Benzo(a)pyrene	2.2 mg/Kg

SS-29 (2)	
Benzo(a)pyrene	1.6 mg/Kg

SS-56 (2)	
Benzo(a)pyrene	2.2 mg/Kg

SS-69A (3)	
Benzo(a)anthracene	18 mg/Kg
Benzo(b)fluoranthene	22 mg/Kg

B-30-2008 [0]
B-29-2008 [0.300]
B-28-2008 [0.580]
B-27-2008 [0.881]
SS-30 [8.57]
SS-29 [1.6]
SS-28 [16.71]
SS-56 [10.3]
SS-60 [0]
SS-49 [21.91]
B-17-2008 [0]
B-37 [1.097]
SS-46 [6.7]
SS-47 [24.97]
B-33 [0]
SS-48 [57.14]
SS-50 [0]
B-32 [0.4]
B-25 [0.194]
B-24 [0.375]
SS-68 [5.27]
B-18-2008 [0.09]
B-26 [0.158]
B-16-2008 [1.003]
B-31 [0]
B-23 [0.984]
SS-33 [0]
B-36 [0.52]
SS-32 [0]
B-38 [0.52]
B-39 [3.993]
B-40 [0.708]
SS-31 [0]
B-34 [0]
B-22 [0]
B-27 [0]
B-30 [1.776]
BLDG. 29
B-12-2008 [0.130]
SS-69A [140]
B-35 [0.837]
SS-36 [0]
SS-35 [0]
SS-34 [0.32]
B-28 [0.555]
B-21 [0]
B-29 [0]
SS-31A
WETLAND BOUNDARY LINE (TYP.)

0 50’ 100’
SCALE: 1" = 50'

FORMER ROME CABLE SITE
NYSDEC SITE NO. 633073
REMEDIAL ACTION PLAN AMENDMENT

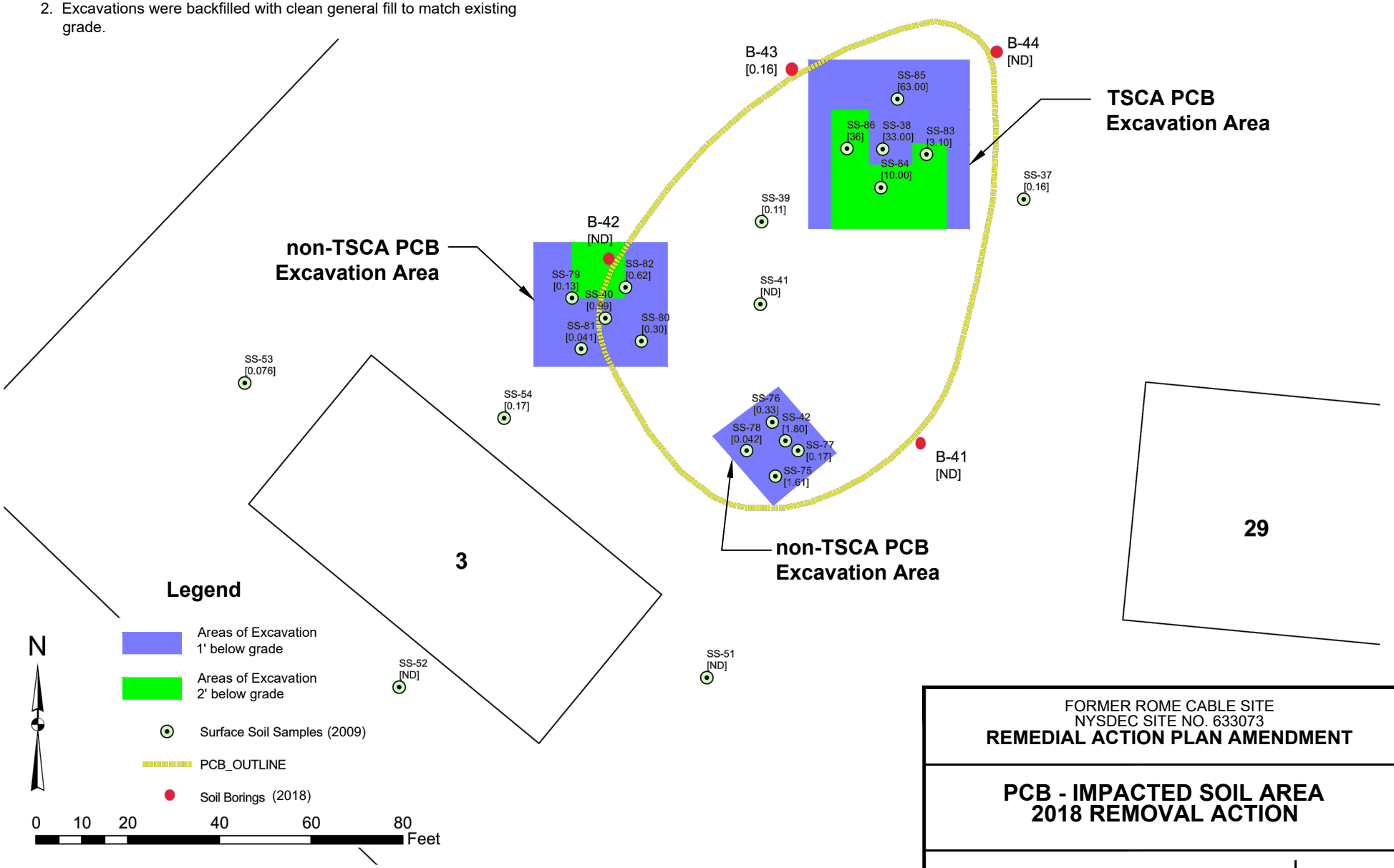
PETROLEUM - DRIP LINE DATA SUMMARY - SVOC

ARCADIS Design & Consultancy for natural and built assets

FIGURE 6

Excavation Notes:

1. Confirmation samples were collected following excavation.
2. Excavations were backfilled with clean general fill to match existing grade.



FORMER ROME CABLE SITE
NYSDEC SITE NO. 633073
REMEDIAL ACTION PLAN AMENDMENT

PCB - IMPACTED SOIL AREA 2018 REMOVAL ACTION

ARCADIS Design & Consultancy for natural and built assets

FIGURE 7

Exhibit A
Former Rome Cable Site

Nature and Extent of Contamination

This section describes the findings for all environmental media that were evaluated to support the 2013 Record of Decisions and supplemental 2018 Pre-Design Investigation (PDI). Results from the Remedial Investigations are summarized in the Record of Decision for the Former Rome Cable Site Operable Unit (OU-1) and OU-2 (NYSDEC, March 2013). As described in Section 7.3, samples from the Pre-Design Investigation (PDI) were collected in 2018 from soils and groundwater to characterize the nature and extent of contamination to support design of the remedy.

For each medium, a table summarizes the findings of the remedial investigation. The tables present the range of contamination found at the site in the media and compares the data with the applicable SCGs for the site. The contaminants are arranged into four categories: volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), pesticides/ polychlorinated biphenyls (PCBs), and inorganics (metals and cyanide). For comparison purposes, the SCGs are provided for each medium that allows for unrestricted use. For soil, if applicable, the Commercial Use SCGs identified in Section 6.1.1 are also presented. The eastern portion of the site was formally designated as OU2 and is comprised of Parcel 3 and the eastern side of Parcel 5, including Former Building 13 (storage), Building 17 (dry plastic resin storage hoppers and shipping), Building 20 (wire spooling and insulation extrusion), Building 22 (warehouse and shipping), Building 24 (storage), Building 25 (basement plasticizer storage tanks, first floor dry plastic resin rail car receiving) and Building 28C (horizontal insulation extrusion line). OU2 is the eastern portion of Parcel 5, Parcel 3 and Parcel 6 and is approximately 19 acres in size.

Waste/Source Areas

Waste/source materials were identified within the unoccupied site buildings and are impacting soil, groundwater, and possibly soil vapor. Access to the buildings to abate debris materials is prohibited due to condition (condemnation) of the structures. Roof sections are partially collapsed distributing asbestos containing materials amongst the debris.

Wastes are defined in 6 NYCRR Part 375-1.2(aw) and include solid, industrial and/or hazardous wastes. Source areas are defined in 6 NYCRR Part 375(au). Source areas are areas of concern at a site where substantial quantities of contaminants are found which can migrate and release significant levels of contaminants to another environmental medium. Wastes and source areas were identified at the site includes waste identified in on-site buildings including but not limited to, paint containers, propane cylinders, fluorescent lights and ballasts, bulk petroleum storage tanks and drummed products, batteries, mercury containing devices, asbestos

containing materials, oil-soaked wood block flooring, and phenolic compounds used in the wire coating process.

The waste/source areas identified will be addressed in the remedy amendment process though demolition of the structure. Waste materials will be sorted and characterized for disposal after demolition of the building structures.

Groundwater

The following summarizes the results of groundwater sampling of the 30 monitoring wells and 10 push probe points installed during the RI in the 2007 through 2009 timeframe. Eight additional monitoring wells and 16 direct push points were added as part of the second phase RI (2009), and 20 direct push groundwater samples were collected during the PDI (2018) to evaluate impacts to groundwater. This data was to be used to support design of the treatment remedy within the original Acetone-Treatment area of concern. Acetone was reported at a maximum of 15 ppb in 20 locations, below the Class GA standard of 50 ppb.

Table 1 - Groundwater (On-Site)

Detected Constituents	Concentration Range Detected (ppb)[a]	SCG[b] (ppb)	Frequency Exceeding SCG
VOCs			
cis-1,2-Dichloroethene	ND – 5.3	5	1 out of 88
Trichloroethene	ND – 5.4	5	1 out of 88
Methyl tert-butyl ether	ND - 57	10	4 out of 88
SVOCs			
Benzo(a)anthracene	ND - 7.7	.002	3 out of 88
Benzo(a)pyrene	ND - 6.9	.002	5 out of 88
Benzo(b)fluoranthene	ND - 9.9	.002	4 out of 88
Bis(2-ethylhexyl)phthalate	ND - 9.4	5	7 out of 88
Chrysene	ND - 8.6	.002	3 out of 88
Indeno(1,2,3-cd)pyrene	ND - 2.9	.002	5 out of 88
Phenol	ND – 600	1	6 out of 88
Naphthalene	ND – 16	10	1 out of 88
Inorganics			
Antimony	ND – 22	3	8 out of 68

Arsenic	ND – 370	25	20 out of 68
Barium	42.7 – 2,300	1,000	6 out of 68
Beryllium	ND – 17	3	12 out of 68
Cadmium	ND - 9.9	5	6 out of 68
Chromium	ND – 340	50	13 out of 68
Cobalt	ND - 200	5	23 out of 68
Copper	ND – 8,600	200	13 out of 68
Lead	ND – 1,300	25	15 out of 68
Mercury	ND – 2.7	0.7	7 out of 68
Thallium	ND - 45	0.5	14 out of 68
Vanadium	ND - 530	14	26 out of 68
Zinc	ND - 2,300	2,000	1 out of 68
Pesticides/PCBs			
Aroclor 1248	ND – 0.82	.09	1 out of 68
Aroclor 1254	ND – 1.1	.09	1 out of 68

a - ppb: parts per billion, which is equivalent to micrograms per liter, ug/L, in water.
b - SCG: Standard Criteria or Guidance - Ambient Water Quality Standards and Guidance Values (TOGs 1.1.1), 6 NYCRR Part 703, Surface water and Groundwater Quality Standards, and Part 5 of the New York State Sanitary Code (10 NYCRR Part 5).

PCBs were detected above the SCG of 0.09 ppb in one of the 68 groundwater samples collected as part of the original RI. The analytical data from GP-08 reported Aroclor 1248 (0.82 ppb) and Aroclor 1254 (1.1 ppb). GP-8 is located in the Demolition Debris Area.

In the original ROD, Cis-1,2-dichloroethylene (5.3 ppb) and trichloroethylene (5.4 ppb) were detected at concentrations slightly above the groundwater quality standard of 5 ppb at GP-04. GP-4 is in the Acetone Impacted Soil Area near former Building 13. One groundwater monitoring well cluster (MW-31S, MW-31I, and MW-31D) and nine direct push sampling points were installed and sampled to further assess this area. No chlorinated ethenes were detected in the additional sampling points. Supplemental groundwater sampling (2018) reported all 20 locations below the groundwater quality standard of 5 ppb.

In the original ROD, methyl tertiary butyl ether (MTBE) concentrations above the groundwater quality standard of 10 ppb were detected in samples collected as part of the chlorinated ethene assessment. Groundwater samples collected from direct push sampling points GP-13 (57 ppb), GP-14 (31 ppb), and GP-15 (11 ppb) all reported MTBE concentrations above the standard. GP-13 is in the Acetone Impacted Soil Area near former Building 13. Supplemental groundwater sampling (2018) reported all 20 locations below groundwater quality standard of 10 ppb.

In August 2018, five (5) wells were sampled for 1,4-dioxane and PFOA/PFOS compounds. PFOAA concentrations ranged from (<0.033 µg/L) to 7.6 ppt and were non-detect for 1,4-dioxane. This data indicates that no further action at this time is necessary for these compounds.

Laboratory data from unfiltered groundwater samples indicate that inorganic (metals) impacts to groundwater above SCGs are widespread across the site. Metals exceeding SCGs are: Aluminum, Antimony, Arsenic, Barium, Beryllium, Cadmium, Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganese, Mercury, Nickel, Sodium, Thallium, Vanadium, and Zinc. No additional metals groundwater data was collected in 2018.

Based on the findings PDI, updated laboratory data on unfiltered groundwater suggest that SVOC and VOCs impacts are below Ambient Groundwater Quality Standards. Groundwater contamination with metals is attributable to long term industrial use of the site and not the result of hazardous waste or hazardous materials disposal. Impacts to groundwater by metals are found on-site and throughout the former Rome Cable Complex facility.

Surface Soil

No additional surface soil samples were collected under the 2018 PDI. The results reported in the 2013 ROD were used to guide additional subsurface soil sampling to further delineate impacts to subsurface soils within the PCB and petroleum drip line Areas of Concern. Surface soil samples were initially collected from 63 locations around the site. These samples were collected from 0 to 2 inches below ground surface and were analyzed for VOCs, SVOCs, PCBs, pesticides/herbicides and metals. The results of the surface soil sampling program are presented in the table (next page):

Table 2A - Surface Soil

Detected Constituents	Concentration Range Detected (ppm)[a]	Unrestricted SCG[b] (ppm)	Frequency Exceeding Unrestricted SCG	Restricted Use Commercial SCG[c] (ppm)	Frequency Exceeding Restricted SCG
SVOCs					
Benzo(a)anthracene	ND – 360	1	18 out of 63	5.6	8 out of 63
Benzo(a)pyrene	ND – 400	1	19 out of 63	1	19 out of 63
Benzo(b)fluoranthene	ND – 520	1	18 out of 63	5.6	9 out of 63
Benzo(k)fluoranthene	ND – 180	0.8	5 out of 63	56	2 out of 63
Chrysene	ND – 390	1	5 out of 63	56	2 out of 63
Dibenzo(a,h)anthracene	ND – 67	0.33	11 out of 63	0.56	9 out of 63
Fluoranthene	ND – 1,000	100	2 out of 63	500	1 out of 63
Indeno (1,2,3-cd) pyrene	ND – 230	0.5	13 out of 63	5.6	6 out of 63
Phenanthrene	ND -870	100	2 out of 63	500	1 out of 63
Pyrene	ND – 710	100	2 out of 63	500	1 out of 63
METALS					
Copper	ND – 261,000	50	9 out of 63	270	9 out of 63
Lead	ND – 3,460	63	9 out of 63	1,000	3 out of 63
PCBs					
Aroclor-1254	ND-63	0.1	7 out of 42	1	7 out of 42

a - ppm: parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil; b - SCG: Part 375-6.8(a), Unrestricted Soil Cleanup Objectives.

c - SCG: Part 375-6.8(b), Restricted Use Soil Cleanup Objectives for the Protection of Public Health for Commercial Use, unless otherwise noted.

Surface soil data has shown SVOC concentrations in excess of NYSDEC Part 375 commercial use SCOs at all locations around the Building Complex 4 perimeter (SS-1 through SS-19). These SVOCs consist of the PAH compounds benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, fluoranthene, indeno (1,2,3-c,d) pyrene, phenanthrene, and pyrene. PAH SVOCs were also detected above Part 375 commercial use SCOs. These samples are co-located with the recommended phthalate and petroleum-impacted soil removal areas.

Copper and lead were detected in surface soils collected from the northwestern perimeter of Building Complex 4 in excess of NYSDEC Part 375 commercial use SCOs. Copper concentrations ranging from 304 ppm to 7,760 ppm exceeded the commercial use SCOs of 270 ppm in SS-1 through SS-4, SS-15 through SS-17 and SS-21 adjacent to Building Complex 4. Lead concentrations exceeded the commercial use SCOs of 1,000 ppm in surface soil samples SS-1 (3,460 ppm) and SS-2 (2,340 ppm). Copper (261,000 ppm) and lead (1,430 ppm) concentrations exceeded commercial use SCOs in sample SS-69A which was recovered from a small area devoid of vegetation approximately 600-feet east of Building 29. No pesticides or herbicides were detected above NYSDEC Part 375-6 commercial use SCOs for any of the 20 surface soil samples tested for these parameters. Soil contamination with metals is attributable to long term industrial use of the site and not the result of hazardous waste or hazardous materials disposal.

SVOCs were detected above Part 375 Commercial SCOs in surface soil samples from beneath the former horizontal wire coating line between Building 28B and Building 29C and along the access road to Building 29. The elevated levels of SVOCs are located adjacent to former access road where evidence of asphalt road debris in surface/subsurface soils

Based on the findings of the Remedial Investigation, the past disposal of hazardous waste and the presence of SVOCs have resulted in the contamination of soil. The site contaminants identified in surface soil which are considered to be the primary contaminants of concern, to be addressed by the remedy selection process are SVOCs. Surface soil contamination with metals is attributable to long term industrial use of the site and not the result of hazardous waste or hazardous materials disposal. Impacts to surface soils are found on-site and throughout the former Rome Cable Complex facility.

Total PCB concentrations in excess of the NYSDEC Part 375 Commercial SCOs of 1 ppm were reported in surface soil samples collected from the equipment decommissioning area west of Building 29. PCB concentrations, above the SCOs, ranged from 1.6 to 63 ppm in this area. The 63 ppm PCB concentration detected in one (2) samples from this area exceeds the Toxic Substance Control Act (TSCA) hazardous waste threshold of 50 ppm. The extent of surface soil PCB impacts exceeding the ES-3 Commercial SCOs of 1.0 ppm cover an area of approximately 200-feet by 100-feet were further delineated in 2018. TSCA and Non-TSCA areas were delineated as shown on Figure 7. Surface PCB soil impacts were further investigated to determine the vertical extent of impacts and soils were removed under a 2018 Remedial Action.

Data for subsurface soil in the PCB-impacted area are restricted to the near surface soil (i.e., less than 2 feet below ground surface). The estimated volume of PCB-impacted soil exceeding the 1.0 ppm SCO is 150 cubic yards, which was removed under a Pre-Design Remedial Action in December 2018. These areas were backfilled with a minimum of 1-foot of crushed gravel. Confirmatory soil sampling confirmed that the underlying soils contain less than 1 ppm total PCBs. The approximate boundary of the PCB soil removal is shown on Figure 7.

Based on the findings of the Remedial Investigation, the past disposal of hazardous waste and the presence of petroleum-based wire drawing solutions and PCB contaminated fluids have resulted in the contamination of soil. The site contaminants identified in soil which are considered to be the primary contaminants of concern to be addressed by the remedy selection process are SVOCs and PCBs. The 2018 PDI findings support that the soil contamination in OU1 is limited to one area depicted on Figure 5. This area was remediated under a Pre-Design Remedial Action in December 2018, where approximately 25 cy of soil was excavated, sampled for confirmation of compliance with unrestricted use SCOs, and backfilled.

Subsurface Soils

Soil borings were advanced and subsurface soil samples were recovered at 26 soil boring and 10 push probe locations across the site. Ten additional subsurface soil samples were collected from selected test pits for laboratory analyses. Subsurface soil consists of an urban fill layer with a variable thickness ranging from 3 to 7-feet, underlain by approximately 28- to 35-feet of loose, stratified, light brown and gray fine sand and silt. This is underlain by a stiff, varied, brown and gray clay and silt. An additional 48 subsurface soil samples were collected during the 2018 PDI, (0-7', above the groundwater table) to refine the nature and extent of the VOC, SVOC and PCB impacts within the areas of concern. Updated results of the subsurface soil investigation are presented on Table 3 (next page):

Table 3 – Soil

Detected Constituents	Concentration Range Detected (ppm)[a]	Unrestricted SCO[b] (ppm)	Frequency Exceeding Unrestricted SCO	Restricted Use Commercial SCO[c] (ppm)	Frequency Exceeding Commercial SCO
VOCs					
Acetone	ND – 0.420	0.05	19 out of 46	500	0 out of 94
SVOCs					
Benzo(a)anthracene	ND – 5.6	1	6 out of 46	5.6	0 out of 94
Benzo(b)fluoranthene	ND – 6.5	1	4 out of 46	5.6	2 out of 94
Benzo(k)fluoranthene	ND – 3.0	0.8	5 out of 46	56	0 out of 94
Chrysene	ND – 5.9	1	6 out of 46	56	0 out of 94
Indeno(1,2,3-cd)pyrene	ND - 29	0.5	6 out of 46	5.6	3 out of 94
Inorganics					
Selenium	ND – 8.4	3.9	1 out of 46	1,500	0 out of 94
Pesticides/PCBs					
Endrin	ND – 0.430	0.014	1 out of 46	89	0 out of 94

a - ppm: parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil; b - SCG: Part 375-6.8(a), Unrestricted Soil Cleanup Objectives.
c - SCG: Part 375-6.8(b), Restricted Use Soil Cleanup Objectives for the Protection of Public Health for Commercial Use, unless otherwise noted.

Additional delineation of the PCB-impacted soil area was completed under the 2018 PDI. Four additional samples (B-41 -B-44) were collected to delineate the lateral extent of PCB impacts, each of were non-detectable for PCBs. These sample locations are shown on Figure 7.

An additional 10 subsurface soil samples were collected to delineate acetone impacts to subsurface soils. Acetone was detected at a maximum concentration of 0.35 ppm, slightly above the protection of groundwater standard of 0.05 ppm. VOCs and SVOCs were reported below the detection limit for all other analytes. Although localized area exceeded the protection of groundwater SCO in soil, no concentrations of acetone exceeded the groundwater standard of 50 ppb. These sample locations are shown on Figure 4.

Subsurface soil samples collected from GP-08, TP-25, and TP-28 exhibited SVOC concentrations below commercial SCOs. Further evaluation of the combined soil and groundwater data collected during the 2018 PDI concluded that no further action is needed to address acetone impacts in this area.

An area of phthalate plasticizer soil contamination was observed during the completion of boring B-08 and the excavation of test pit TP-6 at the phthalate tank loading area located on the west side of Building 25. Subsurface soil analytical results reported concentrations of bis(2-ethylhexyl)-phthalate (140 ppm and 640 ppm) and di- noctyl phthalate (41 ppm and 140 ppm). The phthalate impacts cover an area of approximately 40 feet by 40 feet, centered on the location of boring B-08. The impacted soil volume in the unsaturated zone is approximately 480 cubic yards (720 tons). Soils exceeding commercial SCOs in this area will be addressed by the remedy. This soil excavation area is shown on Figure 3.

One metal (selenium) was reported above the unrestricted use SCO in the soil sample from GP-06 (8.4 ppm). One pesticide (Endrin, 430 ppb) was detected above the unrestricted use SCO of 0.014 ppm.

Petroleum-impacted subsurface soil was observed at the former diesel fuel underground storage tanks (USTs) located south of Building 20. Visible and olfactory evidence of impacts were observed from approximately 2 feet below ground surface to the top of the water table encountered at approximately 8 feet below ground surface. Analytical results from this location detected no compounds in excess of NYSDEC Part 375 protection of groundwater SCOs. The extent of petroleum covers an area approximately 35 feet by 25 feet centered on the location of boring B-06. The impacted soil volume in the unsaturated zone is approximately 260 cubic yards (approximately 390 tons). Soils exceeding commercial SCOs will be addressed by the remedy. Excavation is limited to the diesel impacted area shown on Figure 3.

Additional sampling was completed within the petroleum drip line. A compilation of historical and 2018 data is provided on Figure 6. Only one location, SS-69A exceeded a commercial SCO. This area was excavated and backfilled under the 2018 Pre-Design Remedial Action, as shown on Figure 5.

Based on the findings of the RI, the past disposal of hazardous waste and the presence of SVOCs have resulted in the contamination of subsurface soil. The site contaminants identified in soil which are considered to be the primary contaminants of concern to be addressed by the remedy selection process are SVOCs. Subsurface soil contamination with metals is attributable to long term industrial use of the site and not the result of hazardous waste or hazardous materials disposal.

Soil Vapor

At this time, the structures are condemned and will be demolished, therefore there is no known current potential soil vapor intrusion concern. Sub-slab soil impacts resulting from historical operations, primarily resulting from historical discharges through drain lines and sumps will be further evaluated as part of the remedy. Institutional controls are included in the proposed remedy to address potential soil vapor intrusion for any future buildings developed on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion.

APPENDIX A

Responsiveness Summary

RESPONSIVENESS SUMMARY

Former Rome Cable Site
Site No. 633073

The Proposed Amended Remedial Action Plan for the Former Rome Cable Site was prepared by the New York State Department of Environmental Conservation (the Department) in consultation with the New York State Department of Health (NYSDOH) and was issued to the document repositories on May 1, 2019. The plan outlined the amended remedy proposed for the Former Rome Cable Site, Oneida County, City of Rome, New York. The State Superfund Site Classification Notice was issued to the public on April 17, 2019. The release of the amended remedial action plan was announced on May 1, 2019 by sending a notice to the public contact list, informing the public of the opportunity to comment on the proposed remedy.

A public meeting was held on May 15, 2019, which included a presentation of the conditions prompting the Class 2 site classification and discussed proposed remedy changes. The meeting provided an opportunity for citizens to discuss their concerns, ask questions and comment on the proposed remedy. These comments have become part of the Administrative Record for this site. The public comment period ended on June 11, 2019.

This responsiveness summary responds to all questions and comments raised during the public meeting and public comment period. Additional comments were received from Arconic (a/k/a, Alcoa) in letter dated June 11, 2019. The following are the responses to the questions and comments that were received:

Comment 1: There was salvage activity happening in the building last year.

Response 1: Comment noted.

Question 2: You said that the basement of the building is flooding. How can that not be impacting the water we are drinking (and water in basements during flooding) at residences across the street?

Response 2: Drinking water is supplied by the municipal public water supply and not from private wells in the area. The Department performs groundwater monitoring to confirm groundwater conditions in and surrounding the site to ensure that contaminated water does not migrate into neighboring buildings.

Question 3: What is the timetable for demolition?

Response 3: Construction is expected to start by the end of the year and demolition is anticipated to be complete within 90 days of the start of work.

Question 4: What is the state doing to follow up on the health of the workers who worked at the site?

Response 4: NYSDOH provided a hand-out entitled "Concerned about Cancer in Your Community" . To speak with someone from the NYSDOH about cancer concerns, please send an e-mail to canmap@health.state.ny.us. Please include a brief description of your concern, name, and a daytime telephone number where you can be contacted. Also, may call 1-518-473-7817. A copy of this information is available upon request.

Comment 5: The houses on Jay Street and Henry Street are very close to the site and you can't block them from the dust during construction.

Response 5: The construction contract will require engineering controls to control dust such as wetting materials, covering staged materials and covering trucks prior to transport offsite. Air monitoring for fugitive dust is required and any exceedances to action levels will require work stoppage and corrective measures. No visible dust will be allowed to migrate from the work zone.

Question 6: When will the demolition start and end?

Response 6: See Response #3.

Comment 7: The building is ugly, dangerous and we worry about kids going in there. Somebody tried to burn it down in the past. It has been empty since 2002-2003.

Response 7: Comment noted.

Question 8: Neighboring residences have standing water in their basements. How do you know contaminated water isn't in our basements, or impacting gardens or seeping into the canal?

Response 8: Based on existing groundwater monitoring, there isn't any concern that groundwater is impacted or that preferential pathways exist that would contribute to basement flooding. Once the buildings are down, the Department will identify and abandon any preferential pathways within and under the buildings which might exist.

Question 9: Based on the data that you have from monitoring wells,does it show off-site migration of contamination?

Response 9: No.

Question 10: I have a friend who couldn't be here. How long is the comment period open? Where can she get information?

Response 10: The comment period was open through May 30, 2019 and the documents are available at the Jervis Public Library. She can also contact the NYSDEC Project Manager, Lisa Gorton, at ((518) 402-9818 or lisa.gorton@dec.ny.gov with any comments or questions.

Question 11: Where are the monitoring locations?

Response 11: The monitoring wells are located around the site, on the site and in the roads around it. Some look like standpipes sticking up from the ground and others are under small manhole covers mounted flush with the ground. The location of the wells are shown on the figures provided in the proposed plan, which is available at the public repository.

Ms. Emily T. Lewis, Counsel for Arconic, Inc., submitted a letter dated June 11, 2019, which included the following comments:

Comment 12: In the Enforcement Status Section of the Proposed Amended ROD, the Department incorrectly recites the ownership history of the Site. Specifically, the Department states that "the Site was owned and/or operated by ... Arconia (f/k/a Alcoa).. ." Specifically, a *former subsidiary* of Alcoa Inc. - Rome Cable Corporation, Delaware - purchased the assets of Rome Cable Corporation in February 1959. Arconic asks that the Department make these corrections in any final amended ROD.

Response 12: Acknowledged. Section 5 of the Amended ROD will be modified as follows:

> The site is currently owned by the Oneida County Industrial Development Authority (OCIDA). Historically, the site was owned and/or operated by Rome Cable, H.T. Dyett, a former subsidiary of Arconic (f/k/a Alcoa), Cyprus Mines Corporation, and several private investors and corporations. Since viable PRPs have been identified, legal action has been initiated by the State to recover State response costs. The State Superfund Classification Notice fact sheet was issued to the public for review on April 17, 2019.

Comment 13: The Department is proposing full demolition of all remaining buildings at the Site at a cost of approximately $11 million more than the estimated $1.6 million cost of the remedy in the original RODs. As detailed below, the Proposed Amended ROD does not justify this substantial increase in cost and does not explain how building demolition achieves any non-speculative remedial goals at the Site. The Proposed Amended ROD adds nothing to the environmental remediation but adds millions to cost estimates. The timing of this amendment also coincides with numerous newspaper stories and press releases heralding the imminent economic redevelopment of this property. It appears that the buildings are primarily an obstacle to economic redevelopment, while environmental remediation is, at best, incidental to the broader redevelopment effort. Although we are not proposing that abandoned and vandalized buildings be left in place, we do not believe that the inactive hazardous waste disposal sites (IHWDS) program is the appropriate program for addressing the conditions at this Site or that costs incurred under this program would be fully recoverable.

Response 13: For the reasons outlined in the responses below, the Department believes that the controlled demolition of the buildings in the Proposed Amended ROD is an appropriate remedial action that abates a significant threat to human health and the environment.

Comment 14: The IHWDS program dictates that "the goal of the remedial program for a specific site is to ... at a minimum ... eliminate or mitigate all *significant threats* to the public health and to the environment presented by contaminants disposed at the site... " 6 NYCRR 375-2.8. The Proposed Amended ROD should be modified to more clearly state what significant environmental threats exist - not just threats that are merely suspected or assumed. If there are no such threats, then building demolition is not a cost- effective remedy and should not be pursued under the IHWDS.

Response 14: In order to mitigate the significant threat, the hazardous debris within the buildings should be removed and the preferential pathways (i.e., drains and sumps) located within and underlying the building slabs should be abandoned. These areas undergo frequent flooding and drainage to the environment. These areas cannot be accessed safely given the current condition of the building. The following reports: Asbestos Pre-Demolition Survey Report (Shumaker, July 2009) and Hazardous Materials Inventory Reports (Shumaker, July 2009) summarize the hazards, including but not limited to: mercury-containing components, PCB-containing materials, refrigerants, and bulk storage tanks. Furthermore, the Department identified TSCA level (>50 ppm) PCB contamination in surface soils surrounding the buildings from historical cleaning and salvaging activity associated with equipment inside the buildings. The Department addressed this removal as part of the Pre-Remedial Design program in effort to minimize risk and transport of contaminants off-site. Abatement of the remainder of the hazardous materials is not feasible given the current condition of the buildings and is driving the need for a controlled demolition.

Comment 15: Specifically, for each of the Remedial Goals outlined in Section 8.1 of the Proposed Amended ROD, it is unclear how the existence of the buildings interferes in meeting these goals, or how demolition of the buildings supports achievement of these goals.

Surface Water: The Remedial Action Objectives in Section 8.1 discuss the removal or prevention of surface water contamination. However, there is no mention of surface water anywhere in the vicinity of the Site and, as a result, there is no mention of contaminated surface water. References to surface water remedies or benefits should be deleted.

Groundwater: Based on previous groundwater assessments documented in the Proposed Amended ROD, the Department concluded that there is no groundwater contamination at the Site. Therefore, there should be no need for a remedy to address groundwater. References to groundwater remedies should be deleted.

Soil: It is unclear how the soil remedy goal is inhibited by the presence of existing buildings. Other buildings have been demolished in the past, and the Department presented no information that sub-slab soils were significantly affected. Also, areas with documented and limited soil impacts at the Site appear to be related to past aboveground operations (e.g., former loading areas, drip areas, etc.). The table on page 10 of the Proposed Amended ROD shows that none of the soil remedies has changed since the original RODs were published,' and the Department proposes no remedies with respect to sub-slab soils following building demolition. If further remedies are expected, this should be made clearer because it would add substantially to the estimated time and cost to remediate the

Site. If no such impacts are expected, then it should be made clearer that there are no proposed amendments to the soil remedy.

Soil Vapor: It is unclear what soil vapor threat is suspected when the 2018 Pre-Demolition Assessment Report consistently shows non-detect results for Volatile Organic Compounds and Semi-Volatile Organic Compounds.[3] On page 10 of the Proposed Amended ROD, the Department concluded that there was no further action required for SVOCs in soils. There is no evidence to suggest that soil vapor is a known threat at this Site, let alone a threat that justifies a $13 million expense. References to any potential elimination of soil vapor pathways should be deleted from the Proposed Amended ROD or this potential pathway should be more clearly explained.

Based on the comments above, the Proposed Amended ROD does not describe a remedy for surface water, groundwater or soil vapor, and it presents no new information for changing the 2013 soil remedy. Accordingly, the Proposed Amended ROD presents no new information to support an additional remedy to address any of the Remedial Goals at the Site, and any additional remedial cost is not justified.

Response 15: The Remedial Action Objectives ("RAOs") related to surface and groundwater remain relevant until the contaminant loading and pathways are fully remediated and monitored to demonstrate that no further action is needed.

In response to soil RAOs, the soil remedy is inhibited by the presence of the existing buildings. Intrusive work in and adjacent to the building foundations is prohibited due to high risk of destabilizing the building walls and foundation. Preferential pathways within the basement of the buildings to the surrounding soils have been identified and it is infeasible to access these areas or remove debris given the frequent flooding condition. The condition of the building deteriorated significantly since original ROD issuance in 2012, and, as such, a 2018 pre-demolition assessment was completed as a pre-design task to update the technical scope and opinion of cost.

In response to soil vapor RAOs, a vapor mitigation system is in operation at the adjacent/upgradient property, the Former Rome Cable Complex 1and 3. This site is managed under a separate NYSDEC program, as Site E633053. Given the history of the site and relation to the Former Rome Cable Complex 4, the Department concurs with New York State Department of Health's recommendation to extend soil vapor concerns to this parcel until remedial efforts demonstrate no further action is required. These impacts cannot be fully assessed until the sub-slab soils are accessed for sampling.

Comment 16: The Proposed Amended ROD frequently refers to the presence of asbestos at the Site as one of the primary reasons for building demolition. For example, Section 7.3 states: "The condition of the buildings has deteriorated since the condemnation, and roof sections with asbestos-containing materials have collapsed ... " However, the Department has not confirmed or tested any building materials to determine whether they contain asbestos. The April 2018 Pre-Demolition Assessment states that "[a]sbestos material was not sampled. Materials suspected to be asbestos were identified and quantified to develop an initial estimate of potential and suspected [asbestos-containing material] remaining on-site." (Assessment, page 3). The Department should first take

representative samples of suspected asbestos- containing materials to determine whether they contain asbestos rather than demolishing the buildings based on an assumption. At a minimum, the Proposed Amended ROD should be amended so that all references to asbestos more accurately refer to *"potential"* or *"suspected"* asbestos-containing material.

Response 16: Asbestos containing materials were identified, sampled, and documented in Asbestos Pre-Demolition Survey Report (Shumaker, July 2009). The April 2018 Pre-Demolition Report was intended to update and supplement the existing data and opinion of costs.

Comment 17: The first page of the Proposed Amended ROD states that "[t]his amendment identifies new information which has led to this proposed amendment and discusses the reasons for the preferred remedy." Arconic notes that the buildings were condemned in 2012 before the original RODs were finalized in 2013. Although the Proposed Amended ROD refers to further deterioration of the buildings since they were condemned, the general condition of the buildings is not new information to justify a fundamental amendment to the RODs.

Also, it is unclear why, in 2018, the Department was conducting pre-demolition assessments of buildings that were not even proposed for demolition until 2019. This context and timing should be explained more clearly in the Amended ROD.

Response 17: The assessment was performed as a PDI task with the intent to confirm the debris inventory and update the opinion of costs to support remedial design. After completion of the inspection, it became evident that the debris inventory was initially under estimated and the condition of the buildings would require controlled demolition to facilitate remediation. The findings were summarized as a pre-demolition assessment to support the amended scope and costs discussed in the plan.

APPENDIX B

Administrative Record

APPENDIX B

Administrative Record

Former Rome Cable Site
Site No. 633073

1. *Remedial Investigation/Alternatives Analysis Work Plan for the Former Rome Cable Site, Parcels 3, 5 & 6*, dated December 20, 2007, prepared by Shumaker Consulting, Engineering and Land Surveyors, P.C.

2. *Remedial Investigation/Alternative Analysis Report for the Former Rome Cable Site, Parcels 3, 5 & 6,* dated November 2011, prepared by Shumaker Consulting, Engineering and Land Surveyors, P.C.

3. *Proposed Remedial Action Plan for the Former Rome Cable Site, Parcels 3, 5 & 6 site, Operable Unit No. 1 dated February 2013, prepared by the Department.*

4. *Proposed Amended Remedial Action Plan for the Former Rome Cable Site,* May 2019, prepared by the Department.

5. *Proposed Amended Record of Decision, Former Rome Cable Site - Comment Letter*, prepared by Arconic (f/k/a Alcoa), June 11, 2019.

6. *Proposed Amended Record of Decision, Former Rome Cable Site- Response to Arconic's Comment Letter,* July 2019 prepared by the Department.