



**Periodic Review Report
12 October 2021 – 12 February 2023
Former Rome Cable Site
NYSDEC Site Number 633073
Rome, Oneida County, New York**

Prepared for

New York State Department of Environmental Conservation
625 Broadway
Albany, New York 12233



Prepared by

EA Engineering, P.C. and Its Affiliate
EA Science and Technology
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315-431-4610

August 2023
Version: FINAL
EA Project No. 1602534.01

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LIST OF ACRONYMS AND ABBREVIATIONS

%	Percent
Arcadis	Arcadis of New York
AROD	Amended Record of Decision
DER	Division of Environmental Remediation
CAMP	Community Air Monitoring Plan
COCs	Contaminants of concern
EA	EA Engineering, P.C. and its affiliate EA Science and Technology
EC	Engineering control
IC	Institutional control
IRM	Interim Remedial Measure
No.	Number
NYSDEC	New York State Department of Environmental Conservation
OCIDA	Oneida County Industrial Development Agency
OU	Operable unit
PCB	Polychlorinated biphenyl
P.E.	Professional Engineer
P.G.	Professional Geologist
PID	Photoionization detector
PRR	Periodic Review Report
PVC	Polychlorinated vinyl
RAO	Remedial Action Objective
SCO	Soil Cleanup Objective
SI	Site Inspection
site	Former Rome Cable Site Remedial Construction Project
SMP	Site Management Plan
SVOC	Semivolatile organic compound
TSCA	Toxic Substances Control Act
VOC	Volatile organic compound

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ES. EXECUTIVE SUMMARY

Table ES-1. Site Summary

Category	Summary/Results
Site Name/Site Number	Former Rome Cable Site (633073)
Engineering Control (EC)	<ul style="list-style-type: none"> • Cover system
Institutional Control (IC)	<ul style="list-style-type: none"> • The property may be used for commercial or industrial use. • All ECs must be operated and maintained as specified in the Site Management Plan (SMP). • All ECs must be inspected at a frequency and in a manner defined in the SMP. • The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the New York State Department of Health or the Oneida County Department of Health to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the New York State Department of Health. • Groundwater and other environmental or public health monitoring must be performed as defined in the SMP. • Data and information pertinent to site management must be reported at the frequency and in a manner as defined in the SMP. • All future activities that will disturb remaining contaminated material must be conducted in accordance with the SMP. • Monitoring to assess the performance and effectiveness of the remedy must be performed as defined in the SMP. • Operation, maintenance, monitoring, inspection, and reporting of any mechanical or physical component of the remedy shall be performed as defined in the SMP. • Access to the site must be provided to agents, employees, or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the Environmental Easement. • The potential for vapor intrusion must be evaluated for any buildings developed within the boundary of the Environmental Easement, and any potential impacts that are identified must be monitored or mitigated. • Vegetable gardens and farming on the site are prohibited. • An evaluation shall be performed to determine the need for further investigation and remediation should large scale redevelopment occur, if any of the existing structures are demolished, or if the subsurface is otherwise made accessible.
Site Management Plan	Site Management Plan Revision No. 3 – April 2021
Certification/Reporting Period	This report covers the period 12 October 2021 to 12 February 2023
Monitoring	Frequency
Site Inspection	Annually
Media Monitoring	Not Applicable

Prior Periodic Review Report Recommendations	Annually
Site Management Activities	<ul style="list-style-type: none"> • 5 October 2022 - Environmental Restoration Project drilling oversight • 3 November 2022 - Impacted manhole investigation • 5 January 2023 - Site inspection (SI)
SI Findings/Concerns	The SI checklist can be found in Appendix C , and the daily field reports and photograph log can be found in Appendix D . During SIs, the site was found to be in compliance with ICs, and ECs were found to be in fair to good condition. However, minor cracks/damage/deterioration was observed on the concrete slabs and asphalt pavement with vegetation break through. No underlying soil was exposed.
Recommendations	<ul style="list-style-type: none"> • Place a protective cover and lock on the well described in Section 3.1 to eliminate a potential pathway to subsurface. • Evaluate whether the polychlorinated vinyl stick up observed without cap and lock is a potential piezometer and whether it should be retained or properly abandoned via New York State Department of Environmental Conservation well abandonment protocols. • Perform proper disposal of the three 55-gallon drums located on-site per all federal, state, and local regulations.

1. INTRODUCTION

EA Engineering, P.C. and its affiliate EA Science and Technology (EA) was tasked by the New York State Department of Environmental Conservation (NYSDEC) under State Superfund Standby Contract Work Assignment Number (No.) D009806-23 to prepare a Periodic Review Report (PRR) for the Former Rome Cable Site (NYSDEC No. 633073) that covers the period from 12 October 2021 through 12 February 2023. The Former Rome Cable Site Remedial Construction Project will be referred to as “Site” within this document. The purpose of this PRR is to certify the engineering controls (ECs) and institutional controls (ICs) required by the remedy, report the results of the Site Inspection (SI), and summarize and evaluate the remedy implemented at the site, relative to the requirements of the Amended Record of Decision (AROD) dated July 2019 (NYSDEC 2019a). This report was prepared in accordance with the Site Management Plan Revision No. 3 – April 2021 (Arcadis 2021b) and NYSDEC Division of Environmental Remediation (DER)-10, Technical Guidance for Site Investigation and Remediation (NYSDEC 2010). A site summary and applicable remedial program information are summarized in the following sections.

1.1 SITE LOCATION, OWNERSHIP, AND DESCRIPTION

The site is located in Rome, Oneida County, New York, and is identified as Tax Map # 242.000-0001-007.001 (**Figure 1**). The site is identified as a commercial lot at the corner of South Jay Street and Henry Street. The site is situated on an approximately 19-acre area bounded by Henry Street and Worthington Industries to the north, South Jay Street and chain link fencing to the south, Henry Street to the east, and wooded wetlands to the west. The boundaries of the site are more fully described in NYSDEC Environmental Easement (NYSDEC 2019b). The Oneida County Industrial Development Agency (OCIDA) currently owns the Site.

The Rome Cable facility was historically used for manufacturing and spinning wire starting in the 1930s. The majority of the historical buildings located on parcels 3, 5 and 6 were constructed during the 1950s and 1960s.

The site was previously divided into two operable units (OUs) that the AROD combined into one. The western portion of the site (Parcel 5) was designated as OU1 and was a heavily wooded area approximately 30-acres in size. Previously a large barn (Building 3) and the wire coating building (Building 29) were located on the northwest side of former OU1 (NYSDEC 2019a).

The eastern portion of the site was designated as OU2 and was covered with buildings, broken pavement, railroad lines and roadways and was approximately 20 acres in size. This area is relatively flat and was the main manufacturing area. Former OU2 is comprised of the eastern portion of Parcel 5 and all of Parcels 3 and 6 (NYSDEC 2019a).

The 2019 AROD selected demolition and off-site disposal of existing structures, excavation and off-site disposal of soils exceeding protection of groundwater soil cleanup objectives, and site cover consisting of either existing foundations or a minimum of 1-foot soil cover as the remedy.

The remedial action was implemented between November 2019 and August 2020 (Arcadis of New York [Arcadis] 2021a).

The site currently consists of an open area with remnant building slabs. The site is zoned industrial and is currently vacant. The properties adjoining the site and, in the vicinity, include commercial and residential properties. The properties immediately south of the site include residential properties; the properties immediately north of the site include commercial properties; the properties immediately east of the site include commercial properties; and the properties west of the site include residential properties.

The site falls within a Potential Environmental Justice Area (**Figure 1**) as determined by economic thresholds per the U.S. Environmental Protection Agency (EPA) Environmental Justice Screening and Mapping Tool (EPA 2023). According to the mapping tool, 30.19 percent (%) of the population around the site has a household income below the federal poverty level which exceeds the Potential Environmental Justice Area threshold of at least 22.82% of the population having a household income below the federal poverty level. An environmental justice screening tool report is provided in **Appendix A**.

OCIDA, the current site owner, has an interest in redeveloping the site in a manner that will provide enhanced socio-economic value to the community. Redevelopment advanced by OCIDA would be within the site's current commercial/industrial zoning.

1.2 INVESTIGATION HISTORY

An initial SI and Remedial Investigation/Alternatives Analysis Report conducted by Shumaker Consulting Engineering and Land Surveying, PC was performed in 2008 to evaluate potential soil and groundwater impacts related to the wire manufacturing facility operated at the site. The investigation consisted of the collection of various surface soil, subsurface soil, sediment, and groundwater samples. An additional eight groundwater monitoring wells were installed at the time of the investigation. Only surface soil samples collected indicated the presence of polychlorinated biphenyls (PCBs) west of Building 29 (**Figure 2**) at concentrations exceeding NYSDEC Soil Cleanup Objectives (SCO) for commercial use. Results also indicated the presence of semivolatile organic compounds (SVOCs) at one surface soil sample.

A second SI was conducted in August of 2016 by Arcadis to assess the conditions of on-site buildings at the site. A limited asbestos survey of on-site buildings and systems was conducted, and asbestos materials were not sampled. Arcadis also collected representative samples of the following: concrete slab and walls, brick walls, wood block floorings, general debris, subsurface samples, wipe samples from specific building surfaces, and paint chip samples for analyses. Samples were collected in locations biased towards observed staining or identified prior to site activities. Samples of the building materials were analyzed for PCBs, metals, SVOCs, volatile organic compounds (VOCs), reactivity, ignitability, and corrosivity.

Laboratory analysis indicated the presence of SVOCs, VOCs, and metals at concentrations below NYSDEC SCOs for commercial use. Asbestos was presumed throughout the main building

complex, that included Building(s) 17, 20, 22, and 25, and was present in the roofing materials at Building 29. The City of Rome Department of Code Enforcement provided Notice of Unsafe Buildings listing the main building complex and Building 29 as condemned. Refer to **Figure 2** for former building locations.

A third site investigation was conducted in July and August 2018 by Arcadis to further delineate the extents of environmental impacts, verify prior site investigation data, and assess potential impacts to the site groundwater. During the third investigation, several soil borings were advanced and sampled, groundwater was collected from selected soil borings, and selected groundwater monitoring wells were sampled for emerging contaminants.

The third site investigation further delineated the extent of VOC, SVOC, phthalate, and diesel impacted soils. In addition to VOC, SVOC, and PCB concentrations exceeding SCOs, source areas for phthalates and diesel fuel were identified across the three investigations. Additionally, the third site investigation concluded that impacts to the groundwater were no longer present as was suggested by the 2008 remedial investigation.

Based on these investigations, the remedial design was prepared. The primary objective of the remedy was to eliminate or mitigate the potential for human health and environmental risks related to the presence of asbestos in buildings 17, 20, 22, and 25, as well as diesel and phthalate in isolated areas of site soil.

1.3 REMEDIAL HISTORY

The site was remediated in accordance with the 2019 AROD. Prior to implementation of the remedial action an Interim Remedial Measure (IRM) was performed at this site between June 2018 and January 2019.

1.3.1 Interim Remedial Measure

The IRM included site preparation and removal actions. Site preparation included clearing vegetation and debris from a portion of the site and installation of perimeter fencing and gates.

IRM removal actions included tank decommissioning and contaminated soil removal. Three approximately 25,000-gallon, above ground storage tanks from outside the southwest wall of Building 25 were cleaned and disposed of off-site. Additionally, soil from four areas around Building 29 with PCB and SVOC concentrations exceeding commercial use SCOs were excavated and shipped off-site for disposal. PCB concentrations were below the Toxic Substances Control Act (TSCA) threshold at one area east and two areas west of Building 29. The fourth area west of Building 29 contained soils contaminated at levels above the TSCA standard.

The four IRM soil removal areas were excavated until confirmation samples collected from the bottom and sidewalls of each excavation confirmed contaminated soil exceeding commercial use SCOs had been removed. Approximately 52 cubic yards of non-TSCA level PCB contaminated soil and approximately 65 cubic yards of TSCA level PCB contaminated soils were excavated from the 4 areas and disposed of off-site.

1.3.2 Remedial Action

The remedial action was performed in accordance with the AROD between November 2019 and August 2020, and included the following components (Arcadis 2021a):

- Installation of additional site fencing.
- Demolition and off-site disposal of existing structures.
- Excavation and off-site disposal of soils exceeding commercial use SCOs from two source areas.
- Site cover consisting of either existing foundations or a minimum of 1-foot of soil cover supporting commercial use.

A detailed summary of the remedial action is provided in the 2021 Final Engineering Report (Arcadis 2021a). During the remedial action, seven structures (Buildings 17, 20, 22, 25, 28, 28C and 29) and two unnamed outbuildings were demolished and disposed of off-site. Structure demolition included characterization, transport, and disposal of building debris containing asbestos containing materials. Additionally, the foundations for Buildings 13 and 24 were demolished and disposed of off-site.

Excavations were performed at two source areas (**Figure 2**), the phthalate source area and diesel source area, to remove soils with contaminants of concern (COCs) above commercial use SCOs. A total of approximately 1,708 tons of hazardous and non-hazardous soils from the phthalate source area (1,078 tons) and diesel source area (630 tons) were disposed of off-site. Confirmation samples collected from the bottoms and sidewalls of each excavation confirmed contaminated soil exceeding commercial use SCOs had been removed. The excavations were then backfilled with clean fill, with a minimum of 4 inches of topsoil and seeded. The clean fill placed in the excavation areas and remaining building foundations serve as the site cover system.

1.4 REMAINING CONTAMINATION

1.4.1 Soil

The remedial program including the IRM and remedial action removed COCs to concentrations below commercial use SCOs. Remediation of COCs to below unrestricted use SCOs was not performed. Site COCs that may remain at concentrations above unrestricted use in soil include PCBs, VOCs (acetone, methyl-tert-butyl ether, 1,2-dichloroethane, trichloroethylene), SVOCs (polycyclic aromatic hydrocarbons and phenol), and petroleum products (NYSDEC 2019a).

1.4.2 Groundwater

Remedial investigations have determined that groundwater is no longer impacted at the site.

1.4.3 Soil Vapor

Due to the lack of on-site building structures, there is no longer an exposure pathway for soil vapor. The site Environmental Easement requires that soil vapor intrusion be evaluated for all future on-site buildings.

1.5 REMEDIAL ACTION OBJECTIVES

In July 2019, NYSDEC amended the original Record of Decision for the site, dated 30 March 2013. The AROD listed the Remedial Action Objectives (RAOs) for the site. The RAOs for each matrix are listed as follows:

1.5.1 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.

1.5.2 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.

1.5.3 Soil Vapor

RAOs for Public Health Protection

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

The site contains contamination above unrestricted use SCOs not removed during the remedial action. ECs have been incorporated into the site remedy to control exposure to remaining contamination during the use of the site to ensure protection of public health and the environment.

The following procedures are required to manage remaining contamination at the site after completion of the remedial action, including: (1) implement and manage all ICs and ECs, (2) prevent future exposure to remaining contamination, (3) limit the use and development of the site to commercial/industrial uses only, and (4) perform periodic inspections, certify results, and submit this PRR.

2. INSTITUTIONAL AND ENGINEERING CONTROL PLAN COMPLIANCE

2.1 INSTITUTIONAL CONTROLS

A series of ICs is required by the AROD (NYSDEC 2019a) to: (1) implement, maintain, and monitor EC systems, (2) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination, and (3) limit the use and development of the site to commercial/industrial uses only. Adherence to these ICs on-site is required by the Environmental Easement (NYSDEC 2019b) and will be implemented under the Site Management Plan (SMP) (Arcadis 2021b).

These ICs include the following:

- All activities shall comply with the Environmental Easement.
- All ECs must be operated and maintained as specified in the SMP.
- All ECs must be inspected at a frequency and in a manner defined in the SMP.
- Groundwater and other environmental or public health monitoring must be performed as defined in the SMP.
- Data and information pertinent to site management must be reported at the frequency and in a manner as defined in the SMP.
- All future activities that will disturb remaining contaminated material must be conducted in accordance with the SMP.
- Monitoring to assess the performance and effectiveness of the remedy must be performed as defined in the SMP.
- Operation, maintenance, monitoring, inspection, and reporting of any mechanical or physical component of the remedy shall be performed as defined in the SMP.

ICs identified in the Environmental Easement may not be discontinued without an amendment to or extinguishment of the Environmental Easement.

The site has a series of ICs in the form of site restrictions. Adherence to these ICs is required by the Environmental Easement. Site restrictions that apply to the Controlled Property are as follows:

- The property may be used for commercial or industrial use.
- The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the New York State Department of Health or the Oneida County Department of Health to render it safe for use as drinking water or for industrial

purposes, and the user must first notify and obtain written approval to do so from the Department.

- Access to the site must be provided to agents, employees, or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the Environmental Easement.
- The potential for vapor intrusion must be evaluated for any buildings developed within the boundary of the Environmental Easement, and any potential impacts that are identified must be monitored or mitigated.
- Vegetable gardens and farming on the site are prohibited
- An evaluation shall be performed to determine the need for further investigation and remediation should large scale redevelopment occur, if any of the existing structures are demolished, or if the subsurface is otherwise made accessible.

2.2 ENGINEERING CONTROLS

Exposure to remaining soils above unrestricted use SCOs at the site is prevented by a cover system placed over the site. This cover system is comprised of a minimum of 12 inches of clean soil or gravel, asphalt pavement, and existing concrete building slabs. **Figure 3** presents the location of the cover system and applicable demarcation layers.

A cover system consisting of the remaining building slab are present in some former building locations. More specifically, the concrete slab of the former main building complex (buildings 17, 20, 22, and 25), former building 28C, and former building 29. A soil cover system is in place at locations where contaminated soils were removed in accordance with the remedial design. These locations are depicted on **Figure 2** and include the phthalate and diesel excavation areas as well as soil removal associated with the demolition of former building 24 concrete slab foundation. The soil cover system is comprised of a minimum 12 inches of clean imported soil underlain with geotextile separation fabric.

The Excavation Work Plan provided in Appendix E of the SMP outlines the procedures required to be implemented in the event the cover system is breached, penetrated, or temporarily removed. Procedures for the inspection of this cover are provided in the Monitoring and Sampling Plan included in Section 4.0 of the SMP. Any work conducted pursuant to the Excavation Work Plan must also be conducted in accordance with the procedures defined in a Health and Safety Plan and associated Community Air Monitoring Plan (CAMP) prepared for the site and provided in Appendix F of the SMP. Any disturbance of the site's cover system must be overseen by a qualified environmental professional as defined in 6 New York Codes, Rules, and Regulations Part 375, a Professional Engineer (P.E.) licensed and registered in New York State, or a qualified person who directly reports to a P.E. licensed and registered in New York State.

2.3 INSTITUTIONAL CONTROLS/ENGINEERING CONTROLS CERTIFICATION

The IC/EC certification form is provided in **Appendix B** of this PRR. OCIDA, Rome Community Brownfield Redevelopment Corporation, and EA have certified that the ICs and ECs are still in place and functioning as intended.

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3. MONITORING AND SAMPLING PLAN COMPLIANCE

The SMP (Arcadis 2021b) was prepared to manage the contamination remaining on the site and to ensure the remedy remains effective by restricting site use, site development, and soil movement on the site. The SMP states that SIs should take place annually to maintain the ECs and ICs at the site.

3.1 SITE INSPECTION

The SI included an assessment of the following:

- Compliance with all ICs, including site usage
- Condition and continued effectiveness of ECs
- General site conditions at the time of the inspection
- Site management activities, including health and safety inspection

Observations from 2022 and 2023 SIs confirm compliance with all ICs and all aspects of ECs to be in good condition.

On 5 October 2022, EA provided oversight for the drilling of geotechnical soil borings through concrete slabs associated with former buildings 17, 20, 22, and 25 for the potential of development of the property. OCIDA and Mohawk Valley Edge representing OCIDA subcontracted CME Associates, Inc. to perform geotechnical drilling in support of potential site redevelopment.

Oversight was provided to ensure that all SMP protocols were followed. EA observed drilling operations, the collection of soil samples, photoionization detector (PID) measurements collected from soil cuttings, the use of air monitoring equipment to comply with a CAMP, and abandonment of soil borings (backfilled with grout to surface). All investigation-derived waste was placed into Department of Transportation approved 55-gallon drums and placed on-site for proper disposal. No CAMP or PID concentration exceedances were detected during monitoring activities.

On 3 November 2022, representatives from EA, NYSDEC, Mohawk Valley Edge representing OCIDA, and the city of Rome performed a site visit to investigate oil/petroleum sheen observed in manholes located in the former buildings 17, 20, 22, and 25 complex area. During field activities, three manholes were inspected (manhole with a lateral pipe from the 633073 Site (Former Rome Cable Complex 1), upgradient manhole near Worthington Industries, and downgradient manhole with surcharged lateral that traverses the 633073 Site towards the main sewer/pump station). Very little sheen was observed in the manhole with lateral pipe from the 633073 Site, and signs of sheen and oil were observed in the downgradient manhole with lateral pipe towards the main sewer/pump station. No signs of sheen or oil were observed in the manhole receiving water from Worthington Industries.

The city of Rome inspected the manhole that had evidence of sheen/oil with a push camera and observed that the pipe seemed to be sealed a certain distance down the pipe from the manhole. The exact distance could not be determined. The camera investigation did not provide any evidence of

oil remnants or potential sources of oil (e.g., breaks, vaults, etc.) in the pipe. The three manholes were inspected again after two major rain events that took place on 13 and 14 November 2022 to see if any signs of additional oil impacts were present. No signs of oil were observed, and the city of Rome considered it a one-off event and continues to monitor the area in the event that it occurs again. If the sheen/oil is observed again, NYSDEC will be notified, a sample will be collected of the sheen/oil substance, and a spill number will be issued per NYSDEC request.

During the 3 November 2022 site visit, EA and NYSDEC also inspected the monitoring well network and the surface soil sampling/excavation area and walked around the Owl Wire Building. No issues were observed. However, three 55-gallon Department of Transportation drums were observed on a concrete pad at the former buildings 17, 20, 22, and 25 complex area and were labeled as investigation-derived waste from the geotechnical soil boring investigation performed in October 2022 by Mohawk Valley Edge. Mohawk Valley Edge will coordinatedisposal of the drums in accordance with all laws and regulations.

On 5 January 2023, EA performed the annual site cover inspection as required by the SMP. Field activities included the inspection of the building slab, asphalt, and drainage of the site; located stick up monitoring wells and assessed their conditions; inspected the southwestern portion of the site and the additional building slab; and locked all the wells on 633073 Site with combination locks. Inspection results are presented as follows:

- Small cracks and minor damage were observed on the building concrete slab. No underlying soil was observed/exposed.
- Asphalt pavement has several areas of minor deterioration (e.g., ruts or holes, subsidence, and erosion) with vegetation breaking through deterioration. No underlying soil was observed/exposed.
- Ponding water was observed on the northeast building concrete slab.
- One stick up monitoring well did not have a protective cap and lock.
- An unprotected polychlorinated vinyl (PVC) stick-up, potentially a piezometer, was observed without a cap and lock.

The completed inspection checklist is presented in **Appendix C**.

Further details of these visits are referenced in the Daily Field Reports (**Appendix D**).

4. GREEN REMEDIATION AND CLIMATE CHANGE RESILIENCE

Consistent with NYSDEC DER-31 Green Remediation Policy, this section provides a brief summary and qualitative assessment of the overall environmental impacts or environmental footprint of the site for the current reporting period. In accordance with NYSDEC's Executive Order No. 24, consideration has been given to reducing the consumption of energy and materials and thereby reducing the production of greenhouse gases in the operation and maintenance of the site. Implementation of NYSDEC DER-31 and Executive Order No. 24 has not compromised the selected remedy's protectiveness of public health and the environment, nor has it hindered achievement of the remedial goals established for the site.

As each discrete step of any site operation and maintenance activity consumes resources and energy, consideration has been given to reducing/eliminating those activities that may not be critical to the protectiveness of the selected remedy.

A critical infrastructure vulnerability assessment was not completed during this certifying period. Such an assessment could generally be utilized to evaluate the potential consequences climate changes may have on a site, as well as any ongoing site management activities.

4.1 GREEN REMEDIATION ASSESSMENT

In accordance with NYSDEC's DER-31 Green Remediation policy, the following section provides a qualitative assessment of the overall environmental impacts or environmental footprint associated with the remedy.

4.1.1 Electric Usage

Implementation of the selected remedy does not directly use electricity as part of site management.

4.1.2 Fossil Fuel Usage

Implementation of the selected remedy does not directly use fossil fuels as part of site management; however, fossil fuels are indirectly used during the completion of maintenance and monitoring activities associated with the annual SI.

Indirect fossil fuel use results from completion of the following site-related activity:

- Transportation to and from the site for annual inspection activities

4.1.3 Water Usage

Implementation of the selected remedy does not directly require the use of water at this site.

4.1.4 Air Emissions

Implementation of the selected remedy does not directly emit contaminants to the air nor impact air quality other than through the combustion of fossil fuels in vehicles, as described above.

4.1.5 Consumption of Materials and Generation of Waste

Monitoring, maintenance, and reporting activities associated with annual SI events result in material consumption and the generation of waste. A summary of the current material consumption and waste generation activity for the site is as follows:

- Paper and office supplies associated with site checklist and report preparation.

4.1.6 Land and/or Ecosystems

Implementation of the selected remedy does not directly involve any disturbance and restoration of land and/or ecosystems at the site.

4.2 CLIMATE CHANGE VULNERABILITY ASSESSMENT

Increases in both the severity and frequency of storms and weather events, an increase in sea-level elevations along with accompanying flooding impacts, shifting precipitation patterns and wide temperature fluctuations, resulting from global climate change and instability, have the potential to significantly impact the performance, effectiveness, and protectiveness of a given site remedy. The intent of this vulnerability assessment is to provide information to allow the site remedy to better prepare for the impacts of the increasing frequency and intensity of severe storms, weather events, and associated flooding brought on by global climate changes and instabilities, to ultimately enhance the remedy's resilience to such events.

This section briefly summarizes the vulnerability of the site and/or the remedy to severe storms, weather events, and associated flooding.

This assessment included consideration of the following:

- ***Flood Plain:*** No component of the site is located in a flood plain, low-lying, or low groundwater recharge area.
- ***Site Drainage and Storm Water Management:*** The site is bordered to the west by relatively flat lands that exhibits the characteristics of wetlands. Significant precipitation events may cause drainage along the southwestern limits of the site to become slow and may cause ponding in the southwestern reaches of the site.
- ***Erosion:*** There is no evidence of erosion at the site or areas of the site that may be susceptible to erosion during periods of severe rain events and which may damage the monitoring well network.

- **High Wind:** The observation wells are stick-ups and are susceptible to damage from the wind itself or falling objects, such as trees, during periods of high wind.

4.3 CONSIDERATIONS FOR OPTIMIZATION OF PHYSICAL/REMEDIAL SYSTEMS

Environmental and energy conservation measures and other methods to reduce energy consumption, resource usage, waste generation, and water usage have been considered. During the certifying period, three field events, as described in Section 3.1, were conducted; no conclusions for the optimization of physical/remedial systems can be made at this time because the steps associated with activities were necessary and occurred in a manner or timing outside of EA's or the NYSDEC's control (e.g., oil impacted manhole inspection).

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5. CONCLUSIONS AND RECOMMENDATIONS

5.1 CONCLUSIONS

The remaining contaminants of concern are currently covered by approved methods as described in the SMP (Arcadis 2021b). The 2023 inspection confirmed compliance with all ICs and all aspects of ECs to be in fair to good condition. However, minor cracks/damage/deterioration was observed on the concrete slabs and asphalt pavement with vegetation break through. No underlying soil was exposed.

5.2 RECOMMENDATIONS

Based on SI observations, the following recommendations are presented:

- Place a protective cover and lock on the well described in Section 3.1 to eliminate a potential pathway to subsurface.
- Evaluate whether the stick up PVC observed without cap and lock is a potential piezometer and whether it should be retained or properly abandoned via NYSDEC well abandonment protocols.
- Perform proper disposal of the three 55-gallon drums located on-site per all federal, state, and local regulations.

5.2.1 Site Inspection

It is recommended to perform SIs on an annual basis. A summary of the recommended inspection schedule is presented in **Table 1**.

5.2.2 Maintenance

Place a protective cover and lock on the well described in Section 3.1 to eliminate the potential pathway to subsurface and evaluate whether the stick up PVC observed without cap and lock is a potential piezometer and whether it should be retained or properly abandoned via NYSDEC well abandonment protocols. A technical memorandum should be completed after maintenance is performed.

5.2.3 Periodic Review Reporting

It is recommended that the PRR continue to be completed on an annual basis as stated in the SMP.

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6. FUTURE SITE ACTIVITIES

Based on the recommendations in Section 4, the following site management activities will be completed during the next PRR reporting period (12 February 2023 to 12 February 2024):

- SIs – annual (planned for October 2024)
- PRR – annually (planned for March 2024)

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7. REFERENCES

- Arcadis of New York (Arcadis). 2021a. *Former Rome Cable Site Remedial Construction Project, Oneida County, Rome, New York, Final Engineering Report, New York State Department of Environmental Conservation Site Number: 633073*. April.
- . 2021b. *Former Rome Cable Site Remedial Construction Project, Oneida County, Rome, New York, Site Management Plan, New York State Department of Environmental Conservation Site Number: 633073*. April.
- New York State Department of Environmental Conservation (NYSDEC). 2010. *New York State Department of Environmental Conservation, Division of Remediation (DER)-10/Technical Guidance for Site Investigation and Remediation*. May.
- . 2019a. *Amended Record of Decision, Former Rome Cable Site, New York State Site Number 633073*. July.
- . 2019b. NYSDEC Environmental Easement Granted Pursuant to Article 71, Title 36 of the New York State Environmental Conservation Law, County: Oneida, Site No: E633053, State Assistance Contract: C302651 as last amended November 7, 2012. April.
- United States Environmental Protection Agency. 2023. *Environmental Justice Screening and Mapping Tool*. Last modified on January 30, 2023. <https://www.epa.gov/ejscreen>

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Tables

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Table 1. Proposed Inspection Schedule

Monitoring Program	Proposed Frequency	Matrix	Analysis
Periodic Review Report	Annual	NA	NA
Inspection of site	Annual	Visual inspection	Visual inspection
Maintenance	As needed	NA	NA

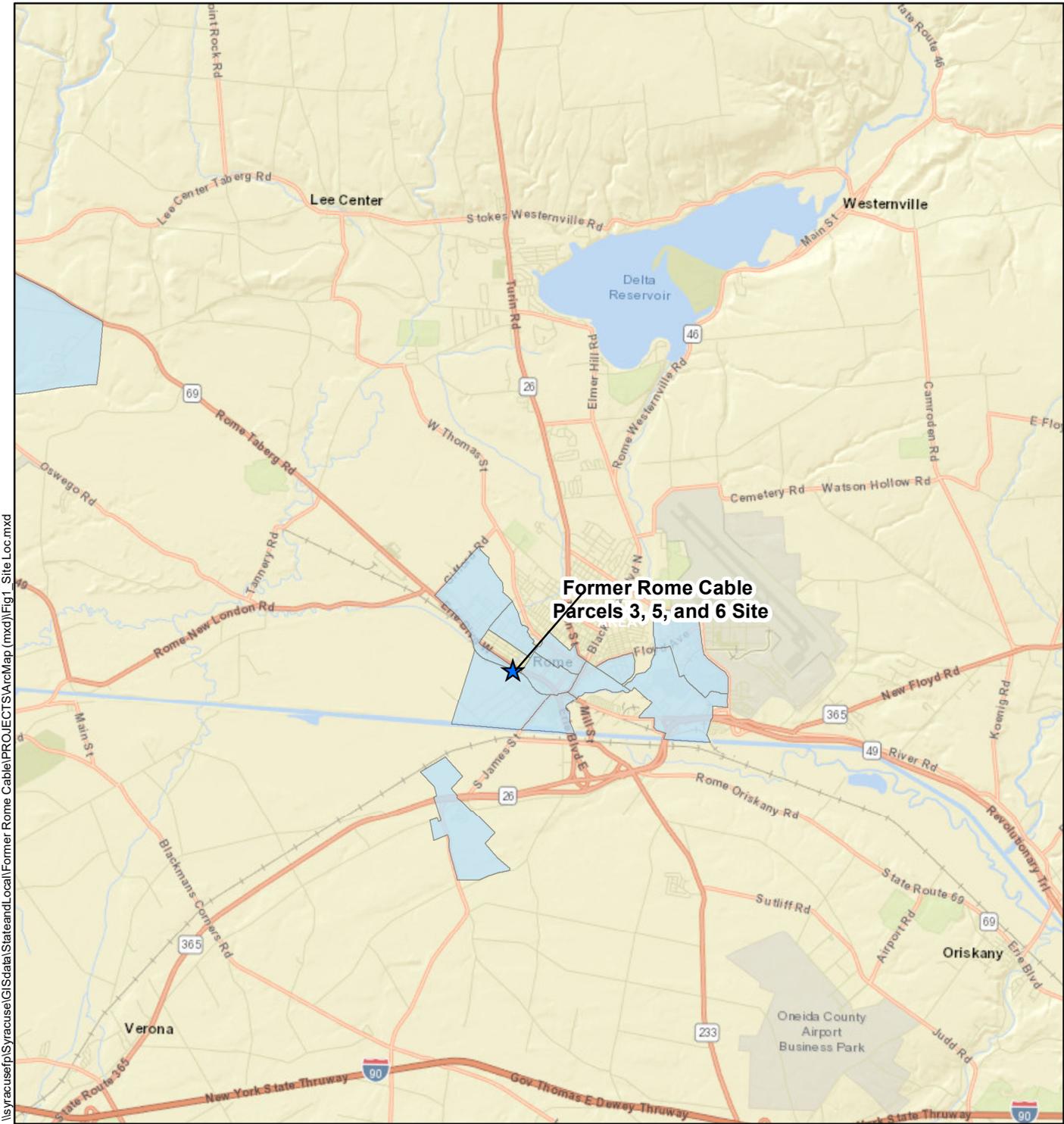
Notes:

NA = Not applicable

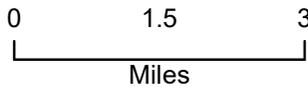
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Figures

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\\syracuse\p\Syracuse\GIS\data\StateandLocal\Former Rome Cable\PROJECTS\ArcMap (mxd)\Fig1_Site Loc.mxd



Legend

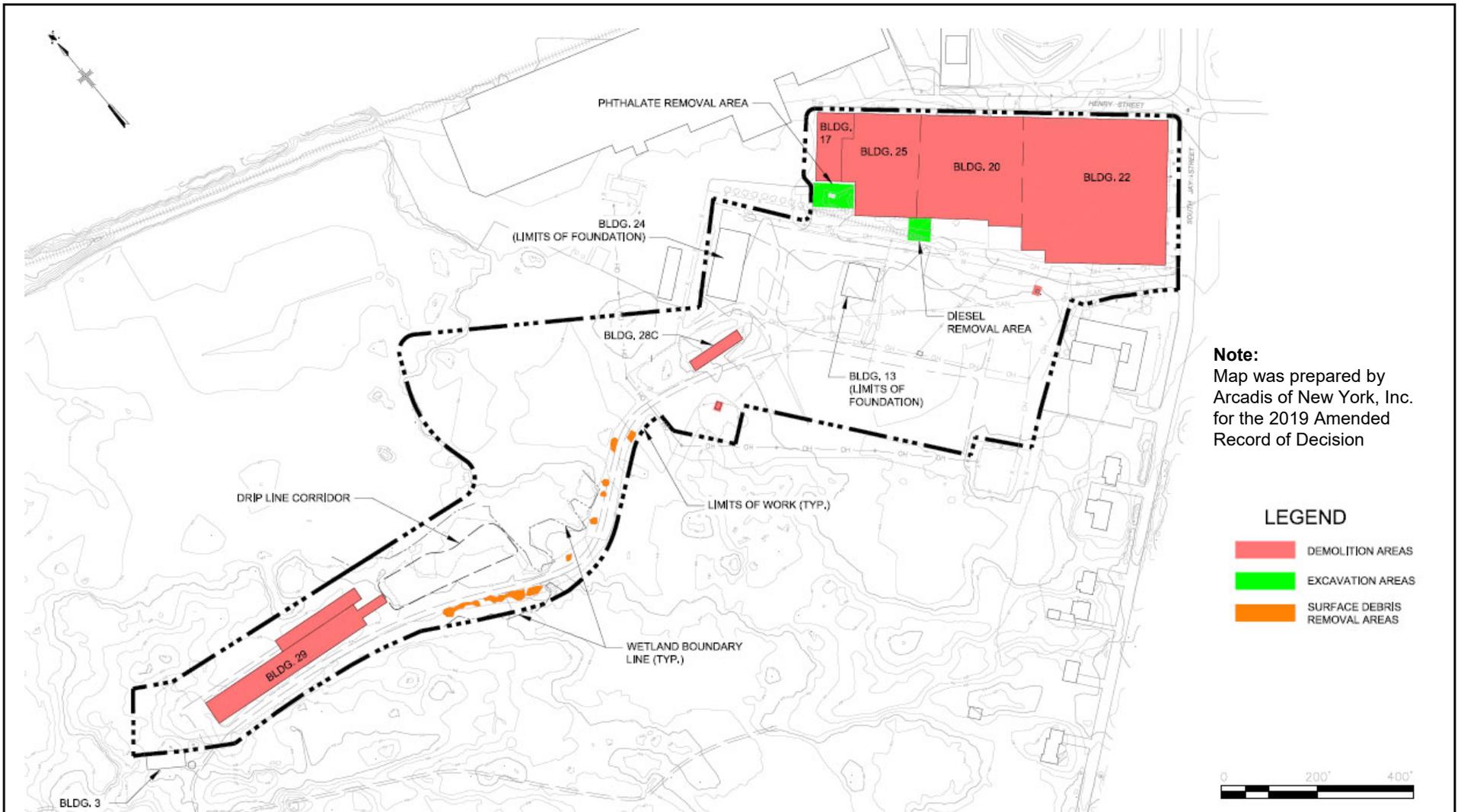
-  Potential Environmental Justice Area
-  Site Location

Figure 1
Site Location
 Former Rome Cable Site (NYSDEC Site 633073)
 Rome, Oneida County, NY

Map Date: 7/11/2023
 Projection:



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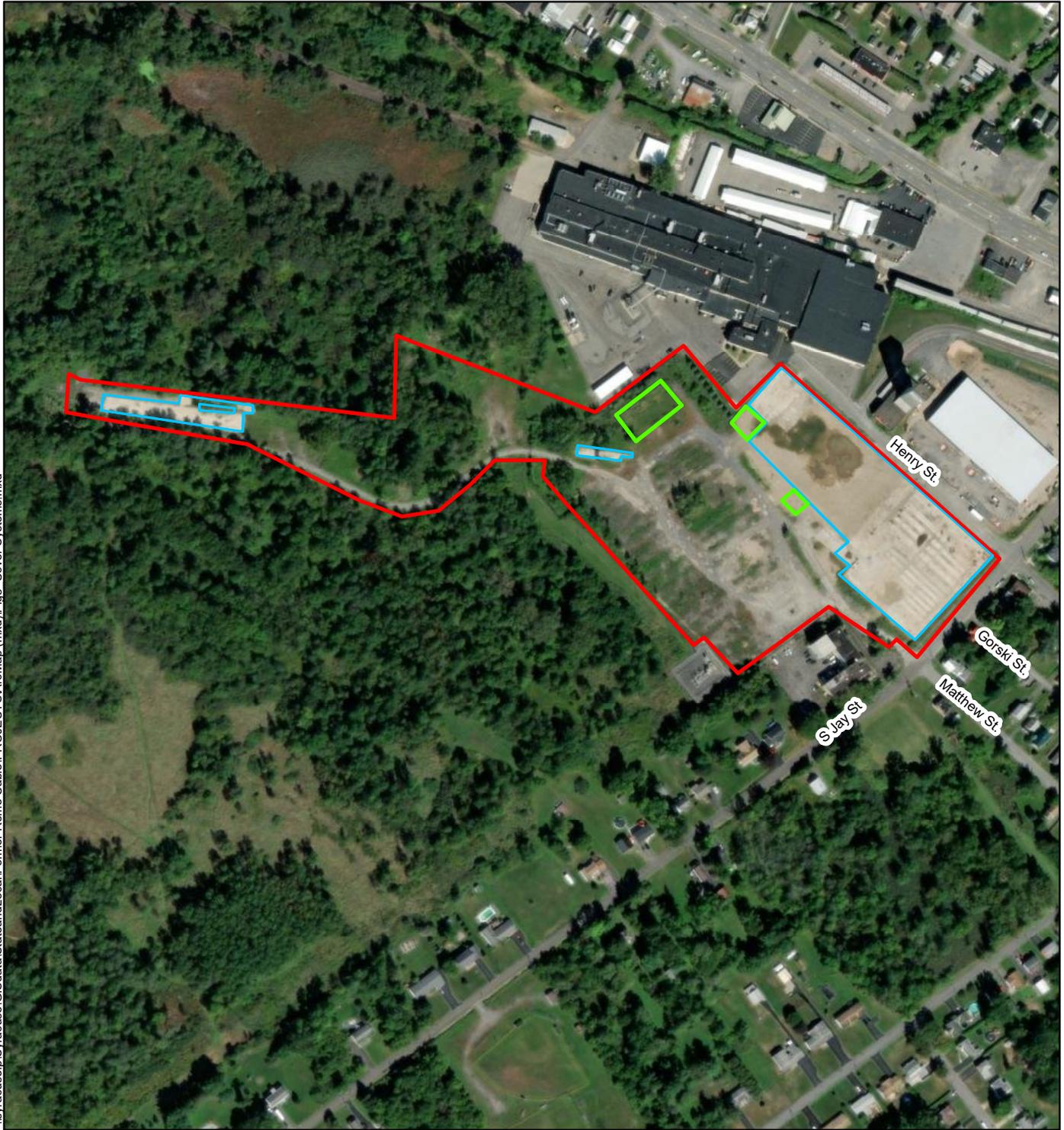
EA Engineering, P.C. and Its Affiliate
EA Science and Technology

Former Rome Cable Site (NYSDEC Site 633073)
Rome, Oneida County, NY

Figure 2
Site Layout

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\\syracuse\p\Syracuse\GIS\data\StateandLocal\Former Rome Cable\PROJECTS\ArcMap (mxd)\Fig3_Cover Systems.mxd



Legend

-  Approximate Site Boundary
-  Approximate Concrete Cap
-  Approximate Soil Cap
-  Site Location

0 100 200
Feet



Figure 3
Cover System Boundaries
Former Rome Cable Site (NYSDEC Site 633073)
Rome, Oneida County, NY

Map Date: 7/12/2023
Projection:



Department of
Environmental
Conservation



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Appendix A

Environmental Justice Screening Tool Report

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EJScreen Community Report

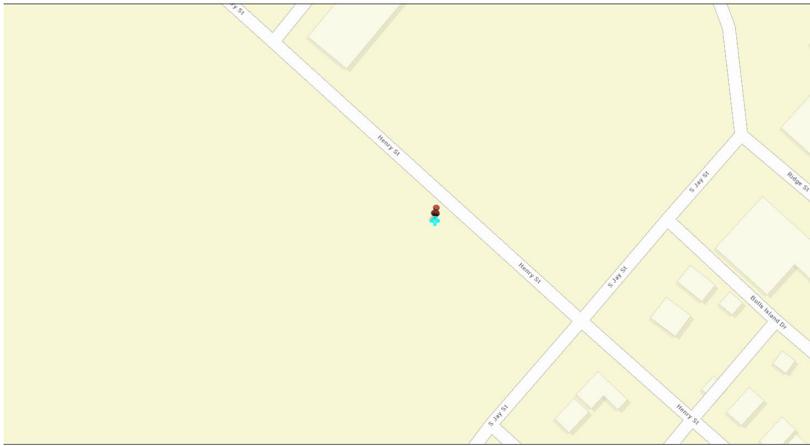
This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

Rome, NY

1 mile Ring Centered at 43.212214,-75.469903

Population: 8,862

Area in square miles: 3.14



10, 2023
Project 1
1:1,128
0 0.01 0.02 0.03 0.04 mi
0 0.01 0.02 0.03 0.04 km
EPA Community Maps Contributors: © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SwireLocation, DeLorme, GeoEye, IGN, GeoEye, USGS, EPA, NPS, US Census Bureau, USDA

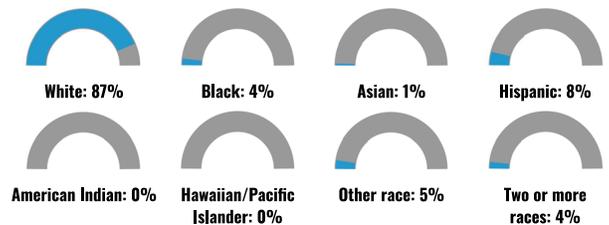
COMMUNITY INFORMATION



LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	94%
Spanish	4%
French, Haitian, or Cajun	1%
Total Non-English	6%

BREAKDOWN BY RACE



BREAKDOWN BY AGE



LIMITED ENGLISH SPEAKING BREAKDOWN



Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

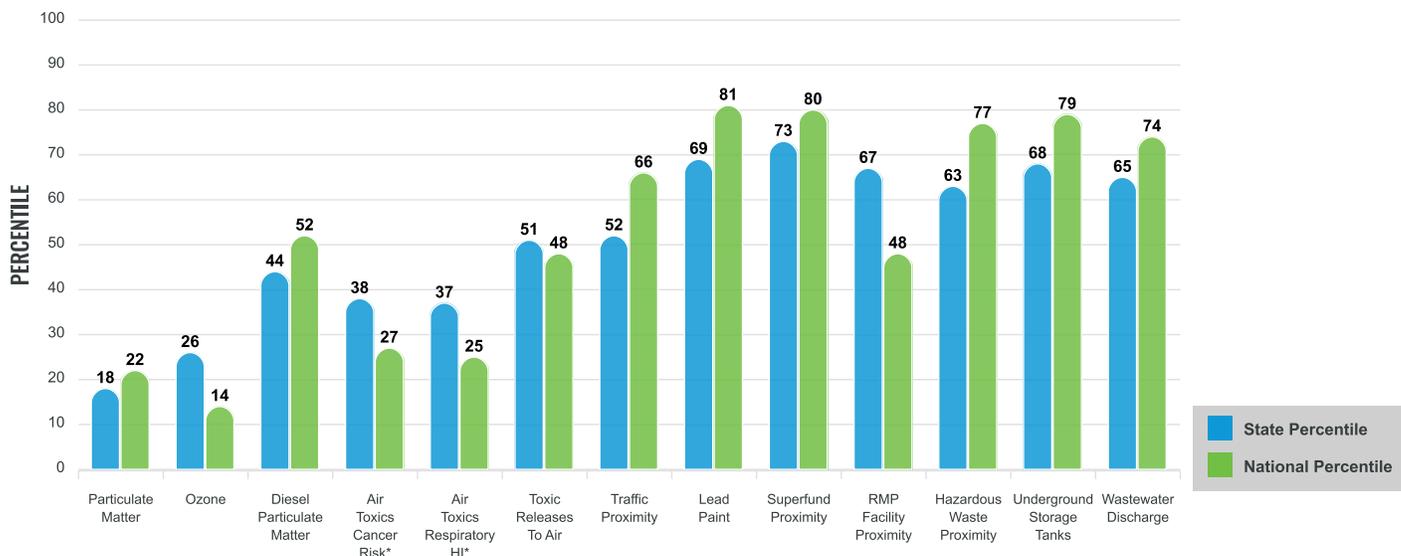
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

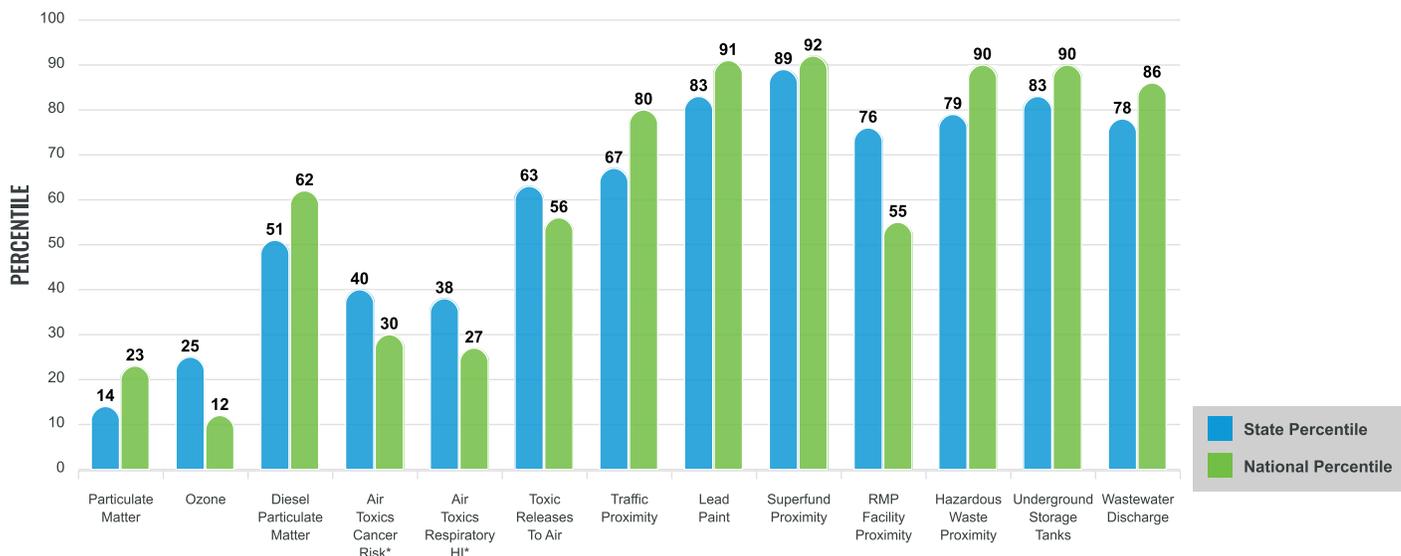
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for 1 mile Ring Centered at 43.212214,-75.469903

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter (µg/m ³)	6.33	7.71	6	8.08	11
Ozone (ppb)	53.5	62.6	11	61.6	6
Diesel Particulate Matter (µg/m ³)	0.16	0.525	24	0.261	34
Air Toxics Cancer Risk* (lifetime risk per million)	20	29	1	28	3
Air Toxics Respiratory HI*	0.2	0.33	5	0.31	4
Toxic Releases to Air	170	450	40	4,600	30
Traffic Proximity (daily traffic count/distance to road)	130	430	43	210	64
Lead Paint (% Pre-1960 Housing)	0.73	0.55	66	0.3	87
Superfund Proximity (site count/km distance)	0.23	0.24	75	0.13	88
RMP Facility Proximity (facility count/km distance)	0.1	0.21	52	0.43	31
Hazardous Waste Proximity (facility count/km distance)	3.7	4.3	63	1.9	84
Underground Storage Tanks (count/km ²)	13	7.7	75	3.9	91
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.016	5	60	22	71
SOCIOECONOMIC INDICATORS					
Demographic Index	38%	35%	60	35%	61
Supplemental Demographic Index	21%	14%	80	14%	80
People of Color	17%	42%	34	39%	33
Low Income	59%	28%	90	31%	88
Unemployment Rate	4%	6%	47	6%	50
Limited English Speaking Households	1%	7%	47	5%	58
Less Than High School Education	19%	12%	76	12%	79
Under Age 5	6%	5%	61	6%	59
Over Age 64	15%	17%	48	17%	49
Low Life Expectancy	21%	17%	81	20%	61

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

Sites reporting to EPA within defined area:

Superfund	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities	2
Water Dischargers	9
Air Pollution	5
Brownfields	4
Toxic Release Inventory	5

Other community features within defined area:

Schools	9
Hospitals	1
Places of Worship	24

Other environmental data:

Air Non-attainment	No
Impaired Waters	Yes

Selected location contains American Indian Reservation Lands* No
 Selected location contains a "Justice40 (CEJST)" disadvantaged community Yes
 Selected location contains an EPA IRA disadvantaged community N/A

Report for 1 mile Ring Centered at 43.212214,-75.469903

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	21%	17%	81	20%	61
Heart Disease	7.8	5.6	93	6.1	80
Asthma	12.2	10	89	10	92
Cancer	6.5	6	54	6.1	54
Persons with Disabilities	18.9%	11.8%	89	13.4%	82

CLIMATE INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	16%	11%	79	12%	80
Wildfire Risk	0%	1%	0	14%	0

CRITICAL SERVICE GAPS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	20%	13%	78	14%	74
Lack of Health Insurance	5%	5%	60	9%	36
Housing Burden	No	N/A	N/A	N/A	N/A
Transportation Access	No	N/A	N/A	N/A	N/A
Food Desert	Yes	N/A	N/A	N/A	N/A

Footnotes

Report for 1 mile Ring Centered at 43.212214,-75.469903

Appendix B

Institutional/Engineering Controls Certification

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IC/EC CERTIFICATIONS

Qualified Environmental Professional Signature

I certify that all information in Boxes 2 through 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Donald Conan at EA Engineering PC.
print name

269 West Jefferson St.

Syracuse, NY 13202

(print business address)

I am certifying as a Qualified Environmental Professional.



Signature of Qualified Environmental Professional



Stamp
(Required for PE)

21 August 2023

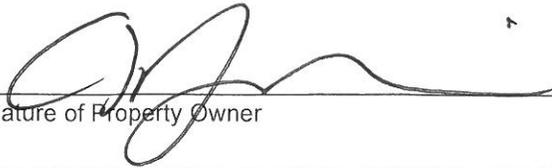
Date

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Enclosure 1
Institutional and Engineering Controls - Property Owner Survey



Site Details		Box 1	
Site No.	633073		
Site Name Former Rome Cable Site			
Site Address: South Jay and Henry Street		Zip Code: 13440	
City/Town: Rome			
County: Oneida			
Site Acreage: 20.5			
Reporting Period: October 12, 2021 to February 12, 2023			
		YES	NO
1. Is the information above correct?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
If NO, include handwritten above or on a separate sheet.			
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
If you answered YES to questions 2, 3 or 4, include documentation with this form.			
5. Is the site currently undergoing development?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Box 2	
		YES	NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial		<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Are all Institutional Controls (ICs) in place and functioning as designed?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
		Date 12/20/22	
Signature of Property Owner		Date	

SITE NO. 633073

Box 3

Description of Institutional Controls

Parcel

Owner

Institutional Control

(Portion of)

OCIDA

Box 4

Description of Engineering Controls

Parcel

Engineering Control

(Portion of)

Cover System

A minimum of 1" of cover (soil or existing building slabs) will remain in place over any areas exceeding Commercial SCOS.

Box 5

Periodic Review Report (PRR) Survey Statements

For each Institutional or Engineering control listed in Boxes 3 and/or 4, by checking "YES" below I believe all of the following statements to be true:

(a) the Institutional Control(s) and/or Engineering Control(s) employed at this site remain unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control; and

(d) if a Site Management Plan (SMP) exists, nothing has occurred that would constitute a violation or failure to comply with the SMP for this Control.

YES NO


Signature of Property Owner

12/28/22
Date



Enclosure 1
Institutional and Engineering Controls - Property Owner Survey



	Site Details	Box 1
Site No.	633073	
Site Name Former Rome Cable Site		
Site Address: South Jay and Henry Street	Zip Code: 13440	
City/Town: Rome		
County: Oneida		
Site Acreage: 20.5		
Reporting Period: October 12, 2021 to February 12, 2023		
		YES NO
1. Is the information above correct?		<input checked="" type="checkbox"/> <input type="checkbox"/>
If NO, include handwritten above or on a separate sheet.		
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?		<input type="checkbox"/> <input checked="" type="checkbox"/>
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?		<input type="checkbox"/> <input checked="" type="checkbox"/>
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		<input type="checkbox"/> <input checked="" type="checkbox"/>
If you answered YES to questions 2, 3 or 4, include documentation with this form.		
5. Is the site currently undergoing development?		<input type="checkbox"/> <input checked="" type="checkbox"/>
		Box 2
		YES NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial		<input checked="" type="checkbox"/> <input type="checkbox"/>
7. Are all Institutional Controls (ICs) in place and functioning as designed?		<input checked="" type="checkbox"/> <input type="checkbox"/>
 _____ Signature of Property Owner		12/28/22 _____ Date

SITE NO. 633073

Box 3

Description of Institutional Controls

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
Portion Of	OCIDA	

Box 4

Description of Engineering Controls

<u>Parcel</u>	<u>Engineering Control</u>
Portion Of	Cover System

Box 5

Periodic Review Report (PRR) Survey Statements

For each Institutional or Engineering control listed in Boxes 3 and/or 4, by checking "YES" below I believe all of the following statements to be true:

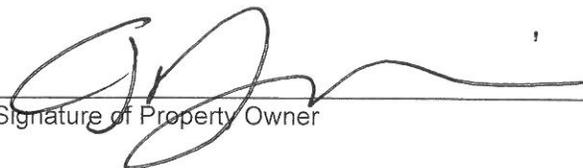
(a) the Institutional Control(s) and/or Engineering Control(s) employed at this site remain unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control; and

(d) if a Site Management Plan (SMP) exists, nothing has occurred that would constitute a violation or failure to comply with the SMP for this Control.

YES NO


Signature of Property Owner

12/20/22
Date

Appendix C

Site Inspection Checklist

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**Former Rome Cable Site
NYSDEC Site Number 633073
Cover Inspection Form**

Time: 0800

Date: 1/5/2023

Weather Conditions: 39F Partly Cloudy

Were Photographs Taken ?: Yes

Inspection Checklist:

A. Concrete Cover:

The soil cover shall be inspected by traversing it and examining it for the following:

	<u>Yes</u>	<u>No</u>
1. Are there cracks, subsidence, or holes in the concrete surface?	<input checked="" type="checkbox"/>	<input type="checkbox"/> <i>Small Cracks</i>
2. Is there evidence of burrowing by animals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Is there any erosion damage or deposition to concrete areas?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Is there discoloration or evidence of spills on the surface?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Is there other evidence of disturbance to the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Is there debris or trash present?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments (*Explanation required for each Yes answer in Section A*):

Small cracks in concrete

B. Asphalt Pavement Cover:

The gravel cover shall be inspected by traversing it and examining it for the following:

	<u>Yes</u>	<u>No</u>
1. Are there ruts or holes in, or subsidence of the asphalt pavement?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Is there evidence of burrowing by animals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Is there debris or trash present?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Is there any erosion damage to the asphalt pavement surface?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Is there discoloration or evidence of spills on the surface?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Is there other evidence of disturbance to the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments (Explanation required for each Yes answer in Section B):

Pavement broken in several areas

C. Site Drainage

The perimeter of the Site near adjacent properties shall be inspected by traversing the area and examining it for the following:

	<u>Yes</u>	<u>No</u>
1. Is there any erosion damage?	—	<input checked="" type="checkbox"/>
2. Is there debris blocking drainage pathways?	—	<input checked="" type="checkbox"/>
3. Is there evidence of ponding or puddling of water?	<input checked="" type="checkbox"/>	—

Comments (Explanation required for each Yes answer in Section C):

Water ponding by concrete slab

General Comments, Site Notes and Observations of Activities on Adjacent Parcels Which Could Interact With the Work:

Signature:

Noah Robinson & Moriah Gilkey
Inspector

1/5/2023
Date

EA
Organization

Appendix D

Daily Field Reports

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Project Schedule Comments
Issues Pending
Interaction with Public, Property Owners, Media, etc.

Include (insert) figures with markups showing location of work and job progress

Site Photographs (Descriptions Below)



CAMP setup #1



CAMP setup #2



CAMP setup #3



CME drilling first boring



Decon pad with IDW drums in CME's truck



CME decontaminating augers

Comments

Site Inspector(s): Emily Fenner	Date: 10/05/2022

Videos of discreet operations have been provided to the DEC Project Manager to facilitate understanding of the ongoing work? Yes

DAILY HEALTH CHECKLIST

Is social distancing being practiced?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is the tail gate safety meeting held outdoors?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are remote/call in job meetings being held in lieu of meeting in person where possible?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Were personal protective gloves, masks, and eye protection being used?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are sanitizing wipes, wash stations or spray available?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Have any workers/visitors been excluded based on close contact with individuals diagnosed with COVID-19, have recently traveled to restricted areas or countries, or are symptomatic (fever, chills, cough/shortness of breath)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<u>Comments:</u> Questions 1-5: N/A		

REMEDIAL ACTIVITIES AT PROPERTIES

1. Have anyone at this location been tested and confirmed to have COVID-19?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
2. Is anyone at this location isolated or quarantined for COVID-19?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
3. Has anyone at this location had contact with anyone known to have COVID-19 in the past 14 days?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4. Does anyone at this location have any symptoms of a respiratory infection (e.g., cough, sore throat, fever, or shortness of breath)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
5. Does the Department and its contractors have your permission to enter the property at this time?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
If Yes to <u>any</u> of 1-4 above: <ul style="list-style-type: none"> • If it is <u>not</u> critical that service/entry be carried out immediately and can be postponed until the risk of COVID-19 is lower, or can be accomplished remotely/without entry, postpone or conduct service without entry. • If it <u>is</u> critical that service/entry be carried out immediately, advise occupants that as a precaution and for our own protection, project personnel will be donning appropriate PPE* (including respiratory protection) - and do so prior to entry. 	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<u>Comments:</u>		

On-Site Waste Storage

Drums, roll offs and piles are staged in secure areas?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Liners and berms have been installed if necessary to prevent cross contamination of clean areas?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Containers are in good condition or properly overpacked?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Waste materials are scheduled to be properly characterized and disposed of prior to demobilization?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Complying with RCRA 90 day storage limitation for hazardous waste?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Piles are securely covered when not in use?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Containers are closed when not in use?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Staging areas should be inspected periodically and any issues addressed immediately?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Signage and labeling comply with RCRA requirements for all staging areas and containers?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
If any issues noted, has Contractor been notified?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<u>Comments:</u>			
Drum disposal is being scheduled. New labels will be applied as necessary during subsequent site visit week of 8/22/22 due to fading.			

NUISANCE CHECKLIST

Were there any community complaints related to work on this date?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Were there any odors detected on this date?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Was noise outside specification and/or above background on this date?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Were vibration readings outside specification and/or above background on this date?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Any visible dust observed beyond the work perimeter on this date?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Any visible contrast (turbidity) beyond engineering controls observed on this date?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Was turbidity checked at the outfall(s)?	AM <input type="checkbox"/>	PM <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Were any property owners NOT provided advance notice for work performed on this property on this date?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Was the temporary fabric structure closed at the end of the day?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Has Contractor failed to protect all foundations and structures adjacent to and adjoining the site which are affected by the excavations or other operations connected with performance of the Work?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
If yes, has Contractor been notified?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<u>Comments:</u>			

RESILIENCE/GREEN REMEDIATION CHECKLIST

Is site power procured from renewable energy sources (e.g., solar, wind, geothermal, biomass and biogas)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Is the Contractor employing 2007 or newer or retrofitted (BART*) diesel on-road trucks and non-road equipment?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Is vehicle idling adequately reduced per 6NYCRR Part 217-3?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Have equipment operators been trained in the idling requirements of 6NYCRR Part 217-3?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Is BART-equipped equipment properly maintained and working?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Is work being sequenced to avoid double handling?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Is there an onsite recycling program for CONTRACTOR-generated wastes and is it complied with?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Are office trailer heating and cooling systems maintained at efficient set points, have programable thermostats been installed?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Are products and materials used in performance of the work appropriately certified (e.g., LEED, Energy Star, Sustainable Forestry Initiative®, etc.)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Are resiliency features included in the design, or completed remedy properly installed and/or maintained (flood control, storm water controls, erosion measures, etc.)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Are green remediation elements included in the design, or completed remedy properly installed and/or maintained (e.g., porous pavement, geothermal, variable speed drives, native plantings, natural stream bank restoration, etc.)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Has Contractor been notified of any deficiencies?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<u>Comments:</u>			

* BART – Best Available Retrofit Technology

Project Schedule Comments	
Mohawk Valley Edge to update drum labels and coordinate disposal.	
Issues Pending	
Interaction with Public, Property Owners, Media, etc.	

Include (insert) figures with markups showing location of work and job progress

Site Photographs (Descriptions Below)	
	
Impacted manhole with lateral (bottom) from 633073 Site	Upgradient Manhole Near Worthington Industries
	
Downgradient impacted Manhole with surcharge lateral (Left) that traverses 633073 Site towards main	MW-05 between Owl Wire building and railroad tracks

	
<p>Potential roof drain and storm sewer on north side of Owl Wire Building</p>	<p>Mohawk Valley Edge geotech spoils drums staged on concrete pad.</p>

<p>Comments</p>	
<p> </p>	
<p>Site Inspector(s): Michael Miller</p>	<p>Date: 11/03/2022</p>
<p> </p>	

Videos of discreet operations have been provided to the DEC Project Manager to facilitate understanding of the ongoing work? Yes

DAILY HEALTH CHECKLIST

Is social distancing being practiced?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is the tail gate safety meeting held outdoors?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are remote/call in job meetings being held in lieu of meeting in person where possible?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Were personal protective gloves, masks, and eye protection being used?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are sanitizing wipes, wash stations or spray available?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Have any workers/visitors been excluded based on close contact with individuals diagnosed with COVID-19, have recently traveled to restricted areas or countries, or are symptomatic (fever, chills, cough/shortness of breath)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<u>Comments:</u> Questions 1-5: N/A		

REMEDIAL ACTIVITIES AT PROPERTIES

1. Have anyone at this location been tested and confirmed to have COVID-19?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
2. Is anyone at this location isolated or quarantined for COVID-19?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
3. Has anyone at this location had contact with anyone known to have COVID-19 in the past 14 days?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4. Does anyone at this location have any symptoms of a respiratory infection (e.g., cough, sore throat, fever, or shortness of breath)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
5. Does the Department and its contractors have your permission to enter the property at this time?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
If Yes to <u>any</u> of 1-4 above: <ul style="list-style-type: none"> If it is <u>not</u> critical that service/entry be carried out immediately and can be postponed until the risk of COVID-19 is lower, or can be accomplished remotely/without entry, postpone or conduct service without entry. If it <u>is</u> critical that service/entry be carried out immediately, advise occupants that as a precaution and for our own protection, project personnel will be donning appropriate PPE* (including respiratory protection) - and do so prior to entry. 	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<u>Comments:</u>		

On-Site Waste Storage

Drums, roll offs and piles are staged in secure areas?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Liners and berms have been installed if necessary to prevent cross contamination of clean areas?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Containers are in good condition or properly overpacked?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Waste materials are scheduled to be properly characterized and disposed of prior to demobilization?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Complying with RCRA 90 day storage limitation for hazardous waste?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Piles are securely covered when not in use?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Containers are closed when not in use?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Staging areas should be inspected periodically and any issues addressed immediately?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Signage and labeling comply with RCRA requirements for all staging areas and containers?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
If any issues noted, has Contractor been notified?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<u>Comments:</u>			
Mohawk Valley Edge will update labels to comply with RCRA requirements and will coordinate characterization and disposal.			

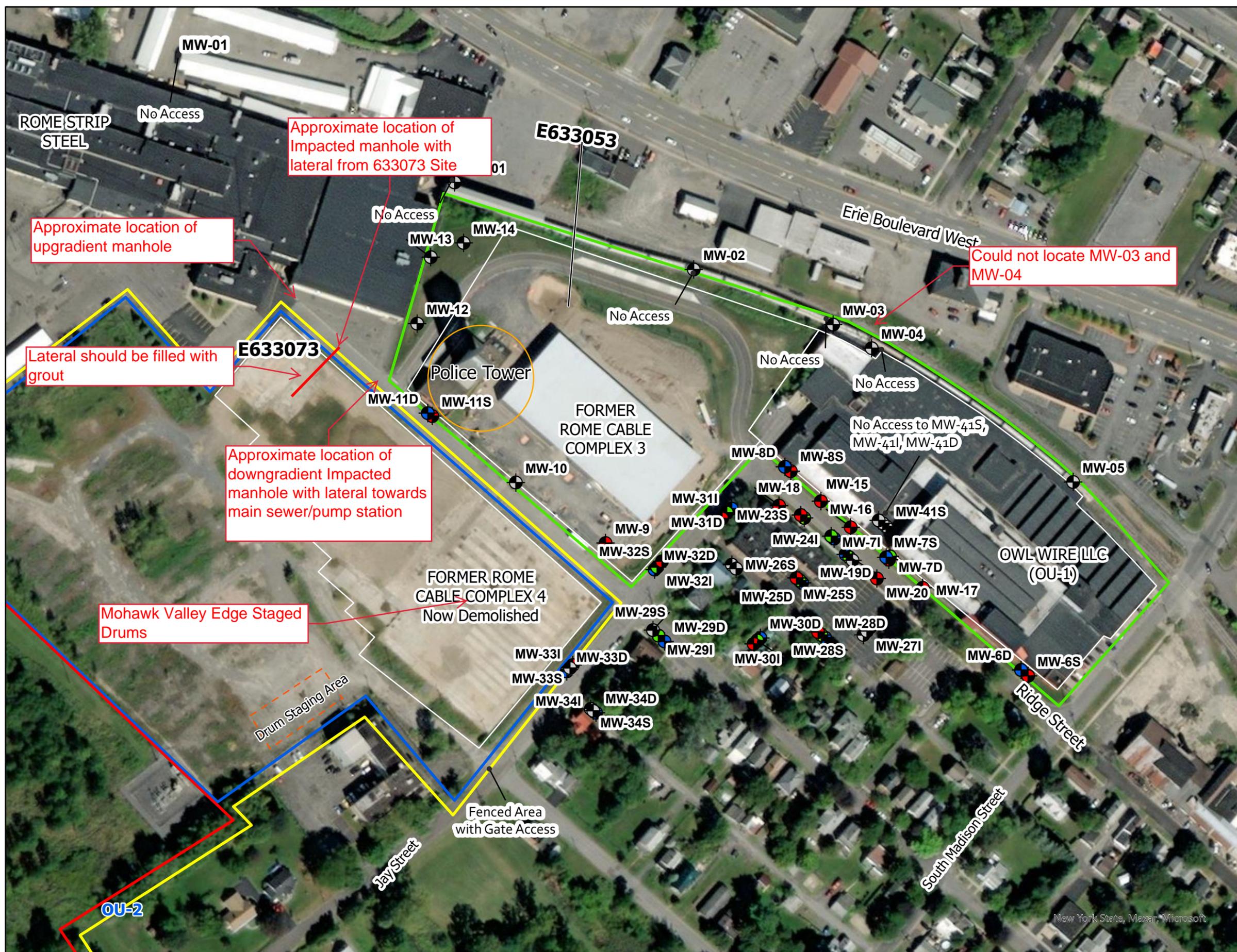
NUISANCE CHECKLIST

Were there any community complaints related to work on this date?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Were there any odors detected on this date?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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Were vibration readings outside specification and/or above background on this date?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Any visible dust observed beyond the work perimeter on this date?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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Has Contractor failed to protect all foundations and structures adjacent to and adjoining the site which are affected by the excavations or other operations connected with performance of the Work?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
If yes, has Contractor been notified?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<u>Comments:</u>			

RESILIENCE/GREEN REMEDIATION CHECKLIST

Is site power procured from renewable energy sources (e.g., solar, wind, geothermal, biomass and biogas)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Is the Contractor employing 2007 or newer or retrofitted (BART*) diesel on-road trucks and non-road equipment?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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Have equipment operators been trained in the idling requirements of 6NYCRR Part 217-3?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Is BART-equipped equipment properly maintained and working?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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Are resiliency features included in the design, or completed remedy properly installed and/or maintained (flood control, storm water controls, erosion measures, etc.)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Are green remediation elements included in the design, or completed remedy properly installed and/or maintained (e.g., porous pavement, geothermal, variable speed drives, native plantings, natural stream bank restoration, etc.)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Has Contractor been notified of any deficiencies?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<u>Comments:</u>			

* BART – Best Available Retrofit Technology



Legend

- Deep
- Intermediate
- Shallow
- Not Located/Destroyed
- Site No. E633053
- Site No. E633073
- E633073 OU-1
- E633073 OU-2
- Site Location

Map Date: 7/28/2022 11:11 AM
 Projection: NAD 1983 2011 StatePlane New York Central
 FIPS 3102 Ft US

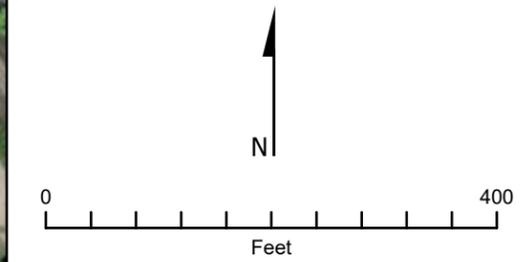


Figure 1
Site Layout
 Former Rome Cable Superfund Site (633053)
 Rome, New York

NYSDEC Division of Environmental Remediation				Department of Environmental Conservation		Contract No. 1602523 DEC Insp. – N/A DEC PM – Evelyn Hussey Contractor Supt. – Engineer PM – Mike Miller Engineer Insp. –Moriah Gilkey	
Site Location: Rome, NY							
Weather Conditions							
General Description	Partly Cloudy	AM	N/A	PM			
Temperature	39F	AM	N/A	PM			
Wind	NA	AM	N/A	PM			
Health & Safety							
If any box below is checked “Yes”, provide explanation under “Health & Safety Comments”.							
Were there any changes to the Health & Safety Plan?				*Yes	X No	NA	
Were there any exceedances of the perimeter air monitoring reported on this date?				*Yes	No	X NA	
Were there any nuisance issues reported/observed on this date?				*Yes	No	X NA	
Health & Safety Comments							
None.							
Summary of Work Performed		Arrived at site:	0800	Departed Site:	1000		
(0800) M. Gilkey and N. Robinson (EA) onsite to perform the 2023 site inspection of 633073. Began site inspection. (0815) Inspection building slab, asphalt, and drainage of site. Located stick up wells and assessed their condition. Inspected the southwestern portion of the site and the additional building slab. (0900) Locked all the wells on 633073 with combination locks (combo# 3073). Inspected three 55 gal drums that are staged on the northeastern building slab. All filled with soil and not properly labeled. EA believes that they belong to Mohawk Valley Edge. (0930) Secured 633073 and proceeded to lock all the stick-up wells on Ridge St. (633053) with the same combination (3073). The surface soil on Ridge St. has been disturb and the soil is visible. (1000) M. Gilkey and N. Robinson (EA) offsite.							
Equipment/Material Tracking							
If any box below is checked “Yes”, provide explanation under “Material Tracking Comments”.							
Were there any vehicles which did not display proper D.O.T numbers and placards?				*Yes	No	X NA	
Were there any vehicles which were not tarped?				* Yes	No	X NA	
Were there any vehicles which were not decontaminated prior to exiting the work site?				* Yes	No	X NA	
Personnel and Equipment							
Individual	Company	Trade	Total Hours				
Moriah Gilkey	EA Engineering	Engineer	2				
Noah Robinson	EA Engineering	Scientist	2				
Equipment Description	Contractor/Vendor			Quantity	Used		
N/A							

Project Schedule Comments	
<p>Mohawk Valley Edge to update drum labels and coordinate disposal. EA to correct 633053 Ridge St. lock combinations to 3053 during next site visit.</p>	
Issues Pending	
Interaction with Public, Property Owners, Media, etc.	

Include (insert) figures with markups showing location of work and job progress

Site Photographs (Descriptions Below)



Minor Cracking and damage to building slab



Ponding on northeast building slab



Drums of soil staged on the building slab



Building slab on the northeast portion of the site



Asphalt cover on the southeast portion of the site.



Portion of the site covered with gravel and vegetation



Cluster of wells located on 633073.



Building remains on the southern portion of 633073



Retaining pond on the northern border of 633073

Wells locked on Ridge St. (633053)

Comments	
Site Inspector(s): Moriah Gilkey	Date: 01/05/2023

Videos of discreet operations have been provided to the DEC Project Manager to facilitate understanding of the ongoing work? Yes

DAILY HEALTH CHECKLIST

Is social distancing being practiced?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is the tail gate safety meeting held outdoors?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are remote/call in job meetings being held in lieu of meeting in person where possible?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
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<u>Comments:</u> Questions 1-5: N/A		

REMEDIAL ACTIVITIES AT PROPERTIES

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<u>Comments:</u>		

On-Site Waste Storage

Drums, roll offs and piles are staged in secure areas?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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<u>Comments:</u>			
Mohawk Valley Edge will update labels to comply with RCRA requirements and will coordinate characterization and disposal.			

NUISANCE CHECKLIST

Were there any community complaints related to work on this date?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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If yes, has Contractor been notified?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<u>Comments:</u>			

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Are green remediation elements included in the design, or completed remedy properly installed and/or maintained (e.g., porous pavement, geothermal, variable speed drives, native plantings, natural stream bank restoration, etc.)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Has Contractor been notified of any deficiencies?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<u>Comments:</u>			

* BART – Best Available Retrofit Technology

Photolog Log Site Inspection of Former Rome Cable 633073



Minor wear on the northeast building slab area

Minor wear on the northeast building slab area



Vaults? On the building slab, were located in more than one place on the building slab. All were secured/not located in a ponding area.

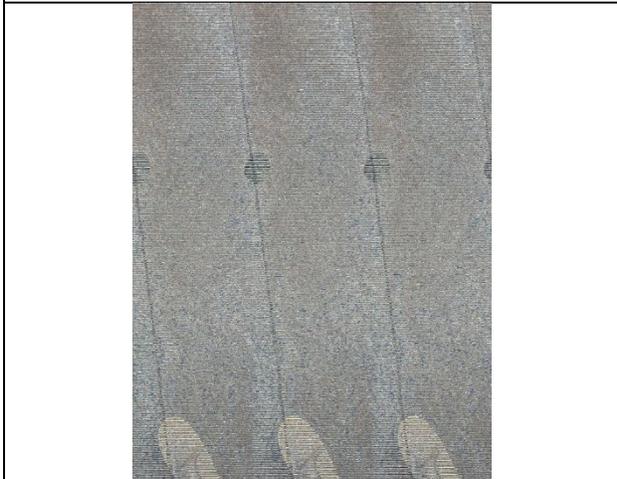
Building slab and ramp on the northeast side of the site



Ponding on the building slab on the northeast side of the site



Building slab on the northeast side of the site



Groves in concrete on the building slab



Drums staged onsite – EA believes they belong to Mohawk Edge



Drums staged onsite – EA believes they belong to Mohawk Edge



Drums staged onsite – EA believes they belong to Mohawk Edge



Building slab on the northeast side of the site



Building slab on the northeast side of the site



Asphalt capped area of the site



Asphalt capped area of the site



Swamp area on 633073



Ponding in area between asphalt and gravel



Hole in asphalt labeled B10



Well cluster found on 633073



Well found on 633073.



Retaining pond on the northern border of 633073



Concrete slab on the southern end of the site



Well found on 633073



Field directly south west of the site fence



Access road to the southwestern portion of 633073



Building remains on the southwest of 633073



PVC in ground on the Southwestern section of 633073.



Building slab located west of the retaining pond



Retaining pond on the northern border of the site.



Well Clustered found on (633073)

Wells locked on Ridge St. (633053)



Wells locked on Ridge St. (633053)

Wells locked on Ridge St. (633053)



Surface soil disturbed on Ridge St. (633053)



Concrete Debris staged on the concrete building slab
