DRAFT INTERIM REMEDIAL MEASURES WORK PLAN

William Street Park Site

NYSDEC Site No. 851056

Corning, Steuben County, New York

Prepared For:

New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway 12th Floor
Albany, New York 12233 – 7012

Prepared By:

301 Plainfield Road, Suite 350
Syracuse, New York 13212

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TABLE OF CONTENTS

LIST OF FIGURES

LIST OF APPENDICES

SECTION 1 INTRODUCTION

This Interim Remedial Measure (IRM) Work Plan (WP) has been prepared to address the presence of ash, brick, and/or glass (ABG) observed in surficial soils that pose a potential exposure risk to receptors in the Williams Street Park (Park) and Off-Site Properties. Parsons has prepared this work plan on behalf of the New York State Department of Environmental Conservation (NYSDEC). The Site location and boundaries are shown in **Figure 1** and **Figure 2**, respectively.

1.1 Site Characterization Summary

In 2020, a site characterization (SC) was completed to determine the physical extent of the suspected ABG waste at the property, whether contamination is present in surface and subsurface soils. The SC investigation included the collection of samples for visual observation for the presence of ABG and the analysis of soil and sediment for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, polychlorinated biphenyls (PCBs), per-and polyfluoroalkyl substances (PFAS), and pesticides. Based on analytical result from the SC the primary contaminants of concern are metals and SVOCs. The investigation also resulted in confirmation of ABG at various locations on site. The full results for the Site Characterization were presented in the 2022 Site Characterization Report for William Street Park (Parsons 2022).

The results from the SC investigation show several heavy metals (including arsenic, barium, cadmium, lead, manganese, and mercury) and several SVOCs (including benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, dibenz(a,h)anthracene, and indeno(1,2,3-c,d)pyrene) were detected in concentrations exceeding Restricted Residential soil cleanup objectives (as defined by 6 NYCRR Part 375- 6.8) (RR SCOs). The analytical results are shown on **Figure 3a and 3b**.

1.2 Pre-Design Investigation Summary

In May and June 2025 Parsons performed a pre-design investigation (PDI) in accordance with the PDI Work Plan prepared by Parsons and approved by NYSDEC (Parsons 2025a) to further investigate the observations of ABG identified in the Park. A PDI report has been prepared documenting the results of this investigation (Parsons, 2025c).

A comprehensive sampling grid (75 x 75 feet) with samples were collected at 0-2 inches, 2-12 inches, and 12-24 inches to inform a 2-foot soil cover system that meets the existing and future use by removing soils contaminated with contaminants of concern (i.e., metals and SVOCs) which exceed RR SCOs and ABG in accordance with Commissioner Policy CP- 51 Section G.

Results of the PDI found ABG-impacted soil in most borings between the basketball court and Dunbar Street within William Street Park. ABG-impacted soil was also identified in animal burrows along neighboring properties. ABG was identified less frequently in Hillvue Park, with material being located sporadically from the playground area to the end of the site to the east. These areas are shown on **Figures 3a and 3b**. In addition to soil samples collected during the PDI, the analytical samples collected during the 2020 site characterization were also reviewed and screened against RR SCOs to identify potential grids for remediation.

The PDI results also indicated several heavy metals (including arsenic, barium, cadmium, lead, manganese, and mercury) and several SVOCs (including benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, dibenz(a,h)anthracene, and indeno(1,2,3-c,d)pyrene) were detected in concentrations exceeding RR SCOs. The analytical results are presented in **Figure 3a and 3b**.

As discussed above, soil with ABG or soil results exceeding RR SCOs present a potential risk of exposure and will be remediated during the IRM remedial Actions. Grids with either ABG or soil analytical results exceeding RR SCOs have been selected for remediation and are identified in red as shown on **Figure 4a and 4b.**

1.2.1 Supplemental Pre-Design Investigations

In addition to the PDI activities completed in the Park in June and July 2025, additional PDI activities may be conducted to further determine the spatial extent of ABG fill across the Park and refine the site specific remedial approach.

1.3 Purpose

This IRM WP has been prepared to address the presence of ABG and exceedances of the NYCRR Part 375-6.8 Restricted Residential (RR) Soil Cleanup Objectives (SCOs) observed in surface soils, soil borings, and test pits that pose a potential human health exposure risk to receptors using the Park located in Corning, New York. The

This IRM WP provides an overview of how the remediation will be conducted. In addition to the IRM WP, a set of IRM Design drawings is being developed with specifications and notes that will guide the remedial construction.

1.4 Remedial Action Objectives

The Remedial Action Objectives (RAOs) for the Site and adjacent off-site properties are as follows:

- RAOs for Public Health Protection
  - Prevent ingestion/direct contact with contaminated soil.
  - Prevent inhalation of or exposure from contaminants in soil.
- RAOs for Environmental Protection
  - Prevent migration of contaminants that would result in groundwater or surface water contamination.

1.5 Presumptive Remedy

This IRM Work Plan has been prepared to address the presence of ABG and exceedances of site specific SCOs that pose a potential human health exposure risk to receptors for both the Park (RR SCOs) and for nearby Off-Site Property locations (Residential SCOs) located in proximity to the Park.

This IRM details the presumptive remedy for this Site which includes:

- Excavation of up to 2 feet of park ABG-impacted soils
- Off-site disposal of ABG-impacted soils
- Placement of a geotextile demarcation layer and backfill materials in excavation areas
- Restoration of vegetation and other disturbed areas
- Implementation of engineering controls (ECs) and institutional controls (ICs) via a site management plan (SMP)

<u>William Street Park</u>

For the Park, the removal of impacted material in conjunction with sampling showing no impacts in portions of the Site will result in a 2-foot soil cover over the entire park which will limit exposure to any deeper ABG impacts. In addition to this IRM WP a set of IRM Design drawings is being developed with specifications and notes that will guide the remedial construction.

Off Site Properties

For the nearby Off-Site Property locations, the presumptive remedy includes a site specific clean cover system via the excavation of impacted soil, replacement with a cover of clean soil and vegetative cover system. The removal of impacted material in conjunction with sampling showing no impacts in portions of these off-site locations will result in a clean cover over these locations which will limit exposure to any deeper ABG impacts.

SECTION 2 INTERIM REMEDIAL MEASURE CONSTRUCTION ACTIVITIES

2.1 Pre-Mobilization Activities

Pre-mobilization activities are described in this Section.

2.1.1 Coordination With Stakeholders

The City of Corning will provide access to the Park for construction activities. The NYSDEC and NYSDOH will coordinate with individual property owners for access to off-site residential properties as needed. The Contractor will need to coordinate with NYSDEC, the City of Corning, and the off-site property owners regarding, but not limited to the following:

- Work Schedule and Construction Hours
- Site Security and Designation of Work Areas
- Proposed Truck Routes and Other Traffic Concerns
- Access to Properties by the Public or Tenants
- Environmental Controls (Air Monitoring / Spill Prevention and Control)
- Emergency Response

2.1.2 Documentation and Reporting

Following the completion of field activities, a summary report will be prepared and submitted to NYSDEC to document the following:

- Scope of work performed
- Location and extent of removal activities
- Site restoration
- Laboratory analysis (if required)
- Data validation (if required)
- Waste disposal

2.1.3 In-Situ Waste Characterization

The Contractor will be responsible for performing in-situ waste characterization sampling prior to performing excavation activities. The sampling and analysis for waste characterization will be detailed in the design specifications and the specific requirements of individual disposal facilities.

2.1.4 Air Monitoring

Representatives from Parsons, NYSDEC, or both will provide oversight during removal activities. The Contractor will be responsible for performing air monitoring during construction activities in accordance with the site-specific Community Air Monitoring Plan, included as **Appendix A**. These readings will be provided on a weekly basis with

all exceedances reported to NYSDEC and NYSDOH the same day (or next business day if after hours) along with the following:

- the reason for the exceedance
- what was done to correct the exceedance
- if the correction was effective

The Contractor will be responsible for taking actions to mitigate dust exposure during intrusive construction activities.

The CAMP will follow the NYSDOH Generic CAMP as further detailed in Division of Environmental Remediation (DER)-10 Appendix 1A (NYSDEC 2010), and recommended response levels and action(s) will be implemented in the event of exceedance.

2.2 Documentation, Monitoring, and Surveying

Removal activities will be documented through daily field summaries and photographs will be taken prior to, during, and following removal activities. Three surveys will be conducted by a New York State licensed professional land surveyor: a pre-excavation survey, a post-excavation survey of excavation extent and depth, and a final as-built survey.

The following as-built survey data will be collected:

- Northing
- Easting
- Ground surface elevation

Horizontal survey data will be based on the North American Datum of 1983 (NAD 83) New York State Plane (Central Zone) coordinate system (in feet). Elevations will be based on the North American Vertical Datum of 1988 (NAVD 88).

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- Scope of work performed
- Location and extent of removal activities
- Site restoration
- Laboratory analysis (if required)
- Data validation (if required)
- Waste disposal

2.3 Site Preparation Activities

Site preparation activities are described in this Section.

2.3.1 Survey Control

Removal activities will be documented through daily field summaries and photographs will be taken prior to, during, and following removal activities. Three surveys will be conducted by a New York State licensed land surveyor: a pre-excavation survey, a post-excavation survey of excavation extent and depth, and a final as-built survey.

The Contractor will be required to conduct a preconstruction survey, performed by a New York State licensed professional land surveyor, to document existing site conditions. The locations of subsurface utilities will be identified by non-intrusive subsurface scans using a combination of geophysical methods to assist in identifying subsurface details.

Visual inspections, including photographs, of existing interior and exterior conditions of the property structures (e.g., buildings, foundations, etc.) will be conducted by a qualified civil or structural engineer to observe and document the current conditions.

Horizontal survey data will be based on the North American Datum of 1983 (NAD 83) New York State Plane (Central Zone) coordinate system (in feet). Elevations will be based on the North American Vertical Datum of 1988 (NAVD 88).

2.3.2 Tree Preservation and Protection

Whenever possible, remedial activities are planned and staged to avoid disturbing healthy trees. If cleanup activities are scheduled near a tree, DEC's contractors work with arborists and field specialists to assess its condition, develop protective measures, and minimize root disturbance. In cases where excavation is required in close proximity, protective fencing may be used to establish a "tree protection zone," and hand tools may be used instead of heavy machinery.

In rare cases where trees must be removed to ensure public health and safety, DEC works with property owners and local officials to replace them with appropriate native species, supporting the long-term health of the urban canopy.

2.3.3 Utility Markout

The Contractor will be required to perform a utility clearance prior to beginning intrusive activities. The utility clearance will include filing a New York Udig location request and performing a geophysical survey using ground-penetrating radar (GPR).

2.3.4 Soil Erosion and Sediment Control

Excavation activities will be performed in accordance with the requirements of the New York State Standards and Specifications for Erosion and Sediment Control (Blue Book 2016) such that erosion is adequately controlled and soil and sediments are not allowed to flow into or onto any watercourse, adjacent properties, roadways, parking areas, walkways or storm and sanitary sewers. Erosion and sediment control measures will be implemented as needed and inspected weekly and after each major storm event or during excavation activities.

Maintenance and repair of the sediment and erosion control measures will be performed on an as needed basis. Excavation will proceed in a manner to minimize water management; however, excess water may have to be removed by pumping prior to backfill. Trenches and sumps may be dug in excavation areas, at depths no greater than 2.5 ft bgs, to minimize areas where water may collect. Water that collects in an excavation area will be allowed to infiltrate to the maximum extent practical. Excavations will be conducted in a manner to minimize uncontrolled run-off. Excavated soil will be bermed and covered/tarped.

A NYSDEC State Pollutant Discharge Elimination System General Permit for Stormwater Discharges from Construction Activity – GP-0-25-001 (or current) substantial equivalency (includes preparation of a site specific SWPPP) to be obtained prior to performing the remedial activities.

2.4 Excavation

Proposed removal areas will be isolated and secured using temporary safety fencing, if needed. Erosion control procedures, such as drain covers with filter inserts and/or or socks, may be employed in active work zones on an as-needed basis. Excavation activities are expected to require earthwork equipment, as well as equipment to transport excavated material.

- William Street Park

  Removal will require excavating to a depth of 2 feet in each of the proposed removal areas (**Figure 4a and 4b**) where ABG was identified, or soil clean up objectives were exceeded as part of the PDI. Additional removal areas may be included during the IRM Design period based on supplemental PDI work or based on ABG observations in the side walls of the excavations during IRM removal activities.

- Off Site Properties

  Removal will require excavating to a property specific depth as determined by the results of the PDI for each of the proposed removal areas where ABG was identified, or soil clean up objectives were exceeded as part of the PDI.

Staging of excavated soils will be conducted in a controlled manner such as (1) on a prepared pad lined with polyethylene sheeting, bermed and tarped to provide containment and protection from precipitation, or (2) in roll-off containers. If excavated soils are staged at a property and left unattended, they will be covered and the area secured to avoid exposure.

All equipment used to excavate, or transport, excavated material will be decontaminated in the decontamination pad prior to leaving the site using a steam pressure washer. Solids and grossly contaminated decontamination rinsate removed during decontamination will be included with excavated materials in the waste containers described above to the extent practical. If necessary, these decontamination byproducts will be placed in separate containers for characterization, transportation, and off-site disposal.

2.4.1 Excavation Contingency

While the design and implementation of remediation on a specific property will not occur until characterization and remedial design activities are complete, the potential for encountering a layer of fill material containing ABG beyond the remediation areas, is possible. In these instances, if a visual indication of a layer of fill material containing ABG is encountered in the side wall of a delineated excavation area within the respective cover system (i.e., the 0 to 2 foot) the footprint of the excavation will be expanded to excavate the material. Where the final limits of excavation are extended, the need for collecting an additional endpoint sample, as required to have a minimum of one sample per 30 linear feet of excavation, will be reevaluated. If needed, an additional endpoint sample may be collected in the field. However, where possible, NYSDEC may elect to extend the limits of the excavation to an existing endpoint, property boundary, and/or property structure to eliminate the need for an additional endpoint sample.

Where the final limits of excavation are extended, the need for collecting an additional endpoint sample, as required to have a minimum of one sample per 30 linear feet of excavation, will be reevaluated. If needed, an additional endpoint sample may be collected in the field. However, where possible, NYSDEC may elect to extend the limits of the excavation to an existing endpoint, property boundary, and/or property structure to eliminate the need for an additional endpoint sample.

Considering that unlike conventional transport mechanisms, off-site material may have originated from glass manufacturing plants and been placed in off-site locations, further investigation of an adjoining property may be warranted and appropriate to fully investigate and characterize the nature and extent of contamination.

2.5 Waste Transportation and Disposal

Based on the results of waste characterization sampling, excavated soils will be disposed of off-site at approved landfills. Soils deemed hazardous, may require onsite treatment prior to disposal as non-hazardous soils. Other ABG-impacted sites in the Greater Corning Area require soils to be treated in onsite stockpiles to stabilize heavy metal impacted soils prior to disposal.

Other waste including, construction and demolition debris, and universal waste will be disposed of accordingly. The recycling of concrete and / or asphalt will be encouraged, if it meets the requirements of the recycling facility.

2.6 Site Restoration

Excavated areas will be restored immediately following removal activities. Restoration of excavations in vegetated areas will include a demarcation layer at two feet with backfilling and covering the excavation with an NYSDEC-approved topsoil and seed, and establishment of a vegetative cover. Restoration of excavations in paved areas will include replacement of any existing concrete curbs, and placement of pavement and/or gravel to match pre-existing site conditions at the Park boundaries with public roadways.

NYSDEC will submit a written notification to the property owner when vegetation is established, as determined by a qualified landscape architect licensed in New York State. This letter will document the transfer of any cover system maintenance activities from NYSDEC to the property owner; specify and require topsoil of a sufficient quality to maintain a vegetative cover of grass. The following list will be implemented to ensure the restoration of the vegetative layer is established and/or corrected if initial restoration is not successful:

- Use improved topsoil
- Improve transition from installed sod to existing lawn
- Aerate, overseed, and top dress any remediated areas on these properties as needed
- Apply four fertilizer treatments during the growing season
- Apply post emergent weed control in June and October
- Maintain the properties (mowing and watering) following germination
- Educate property owners with challenges related to pets and weather and solicit the property owner's assistance
- Assist a property owner to create a safe space for the pet, if needed, that helps keep the pet off the sod until it is established
- Educate property owners on how to water areas in which a pet urinates to help dilute the urine's damaging nitrogen and salts
- Educate property owners on how to water the sod during challenging weather periods
- Participate in a monthly walk through with NYSDEC representatives with corrective measures implemented as needed
- Address property owner complaints at the time they are received
- Meet with the property owner to discuss turnover and ongoing maintenance requirements after the vegetation is established (expected to take up to one year)
- Provide written notifications to the property owner and the NYSDEC when vegetation is established
- Fulfill the requirements of the Sod Enhancement Program at the conclusion of these corrective measures by:
    - Conducting a joint inspection which includes Corning, Corning's qualified landscape architect or other qualified personnel, the NYSDEC, and the property owner to determine whether a vegetative cover of grass that can be maintained has been established; and
    - Submit a Notification of Completed Restoration to the property owner with a copy to the NYSDEC if it is determined that a vegetative cover of grass that can be maintained has been established.

SECTION 3 GREEN REMEDIATION

Green remediation is the practice of considering all environmental effects of remedy implementation and incorporating options to minimize the environmental footprint of cleanup actions (NYSDEC 2010b). Green remediation concepts and techniques have been considered during the design of the remedy with the goal of improving sustainability of the cleanup. Major green remediation concepts have been considered and incorporated into the design of the remedy as outlined below.

3.1 Long-term Environmental Impacts of Treatment Technologies and Stewardship

The remedy includes the consideration of the environmental impacts of treatment technologies and remedy stewardship over the long-term. This consideration will be addressed with the following methods:

- Avoid unintended soil compaction by bounding project staging and support areas to areas where soil compaction is already likely (i.e., existing impervious areas, existing access roads).

3.2 Emissions Reduction

The remedy includes the reduction of direct and indirect greenhouse gases and other emissions as presented in Specification 01 35 00 – Green Remediation Practices and as outlined below:

- Reduce vehicle idling in all vehicles, both on and off-road, and shut off vehicles when not in use for more than five minutes;
- Use ultra-low sulfur diesel (ULSD) in off-road vehicles, where possible;
- Replace or retrofit older engines or use newer efficient models in vehicles and equipment, where practicable, and maintain engines in accordance with manufacturers' standards; and
- Where possible, use locally manufactured materials (i.e., manufactured within 150 miles of the Site) in material sourcing and procurement to avoid unnecessary transportation emissions.

3.3 Energy Efficiency

Practices in energy efficiency will be implemented both during the remedy and have been considered in long-term source removal as presented in Specification 01 35 00 – Green Remediation Practices and as outlined below:

- Use environmentally friendly products such as compact fluorescent lights or light-emitting diode (LED) lightbulbs in temporary facilities;
- Use environmentally friendly electronics, such as ENERGY STAR-rated products, in temporary facilities;
- Turn off lighting in temporary facilities when not occupied and maintain energy efficient temperature set-points in temporary facilities.

3.4 Resource and Materials Management

Resources and materials will be conserved and efficiently managed during the remedy as outlined below:

- Material segregation measures will be implemented to prevent contact with contaminated water and material.

3.5 Waste Reduction

Waste reduction will be completed during the remedy by developing an on-site recycling program and by reusing acceptable site materials which would otherwise be disposed of and/or imported using the following methods:

- Implement an on-site recycling program during the remedy for personal consumables (i.e., paper, plastics, and aluminum); and
- Use recycled-content material in temporary facilities and day-to-day site operations where practicable.

3.6 Habitat Value

Maximization and creation of habitat will be completed during final Site restoration activities as summarized below:

- Restore project areas in-kind to the extent possible using natural restoration design principles and with the goal of re-establishing habitat function; if present.

3.7 Green Communities and End-use Integration

The Site remedy was developed with the ultimate goal of fostering green and healthy communities and incorporating working landscapes to balance ecological, economic, and social goals.

SECTION 4 ADAPTIVE MANAGEMENT

The PDI was performed to determine the general acceptability of the top two feet to serve as a soil cover recognizing that certain grids may require additional investigation, including test pitting and trenching, to ensure an adequate clean cover spans the entire property which is protective of public health and the environment. The PDI Report and design drawings may be updated as new information becomes available.

Similarly, Off-Site Properties were initially evaluated only if the presence of ABG was known to NYSDEC. However, visual evidence of ABG along the Park property line may require NYSDEC to evaluate additional Off-Site properties. This would also be necessary if a residential property cleanup encounters ABG along a residential property line. NYSDEC would seek to investigate an adjoining property in its entirety considering the known heterogeneous nature of ABG impacts.

Additionally, NYSDEC is coordinating closely with the City of Corning on its redevelopment plans to minimize the need for NYSDEC to respond to and/or manage ABG encountered following implementation of the IRM WP during site management. To the extent practical, NYSDEC intends to provide a clean cover with grading, clean utility corridors and sufficient investigation for anticipated features (e.g., ADA compliant entrances) to facilitate the restoration of the Park in a safe and effective manner. It is important to note that a clean cover may consist of vegetated soil, trees, asphalt, buildings, concrete or other features.

NYSDEC is implementing a presumptive IRM which will consist of a soil cover, ICs including an environmental easement where appropriate and a SMP. This approach is intended to be flexible and will be adaptively managed to ensure the best possible remedial outcome. Revisions to the IRM WP may be documented in an updated IRM WP, revised design drawings , and/or the Construction Completion Report for the site.

SECTION 5 POST-CONSTRUCTION ACTIVITIES

5.1 Construction Completion Report

A Construction Completion Report (CCR) will be prepared upon completion of the remedial action that documents construction implementation and the creation of ECs.

The CCR will be prepared in accordance with NYSDEC DER-10 (NYSDEC 2010a) and the NYSDEC Generic Template for Final Engineering Reports (available on the NYSDEC website). At minimum, the CCR will present the following information:

- Description of the remediation activities, including variations, if any, from the NYSDEC-approved RAWP.
- Record ("as built") drawings, tables, and figures detailing the remediation activities completed and indicating that acceptance criteria were met.
- Information and documentation regarding the final quantities and disposition of materials disposed of on-site during implementation of the remediation activities.
- Summaries of field observations, tests performed, laboratory samples collected, and monitoring results obtained during construction.
- Summaries of problems and deficiencies encountered during construction, including recurring problems and/or deficiencies discovered.
- Representative photographs taken during implementation of the remediation activities.
- Copies of regulatory permits and other key regulatory agency correspondence related to the permits and permit compliance.
- Certification statement signed and sealed by a professional engineer (PE) licensed in New York State.

5.2 Site Management Plan

A Site Management Plan (SMP) will also be prepared for the Site following the completion of remedial activities. The SMP will include but may not be limited to an Institutional and Engineering Control Plan (IECP) that identifies all use restrictions and ECs for the property and details the steps and media-specific requirements necessary to ensure the following ICs and/or ECs remain in place and effective.

5.2.1 Institutional Controls

An IC is a non-physical method of restricting exposure to constituents above applicable SCOs. A series of ICs will be implemented at the Site to: (1) maintain and monitor EC systems; and (2) prevent future exposure to remaining Subject Material.

For the purpose of the IRMWP, the following ICs will be implemented. These ICs will be finalized in the NYSDEC-approved Site Management Plan (SMP):

- Residential properties may be used for residential use. City of Corning rights-of-way properties may be used for restricted residential use.
- All ECs will be operated and maintained as specified in this IRM WP and the SMP;
- All ECs will be inspected at a frequency and in a manner defined in the IRM WP and the SMP;
- All future activities that will disturb remaining Subject Material will be conducted in accordance with this IRM WP and the SMP;
- Monitoring to assess the performance and effectiveness of the ECs will be performed as defined in this RAWP and the SMP;

- Operation, maintenance, monitoring, inspection, and reporting of any mechanical or physical component of the cover system will be performed as defined in this IRM WP and the SMP;

5.2.2 Engineering Controls

Exposure to excavated materials within the remediated areas of the Park is prevented by a soil cover placed over the area. The soil cover is vegetated to control erosion of the soil layers above the geotextile demarcation layer. The vegetative cover will be maintained. Maintenance requirements for the EC will be incorporated into the SMP.

Prior to any disturbance of the soil cover, an Excavation Work Plan (EWP) will be submitted to and approved by NYSDEC. The EWP shall be similar to a Remedial Action Work Plan and will include sections covering the following topics (modified as appropriate for work scope):

- Notification
- Soil screening methods
- Soil staging methods
- Material excavation and load-out
- Materials transport off-Site
- Materials disposal off-Site
- Materials reused on-site
- Fluids management
- Cover system restoration
- Backfill from on-site sources
- Backfill from off-site sources
- Stormwater pollution prevention
- Excavation contingency plan
- Community air monitoring plan
- Odor control plan
- Dust control plan
- Other nuisances control plan.

Details on the contents to be included in the EWP are provided in the NYSDEC Site Management Plan Template (NYSDEC 2015). A health and safety plan, field sampling plan (as appropriate), and a quality assurance project plan (as appropriate) will be included with the EWP.

SECTION 6 PRELIMINARY PROJECT SCHEDULE

The project schedule is dependent on the NYSDEC approval of the Final (100%) IRM WP and other factors such as permitting authorizations, and stakeholder agreements. A detailed construction schedule at the time of Final (100%) IRM WP approval.

Approximate final design and construction project milestones and durations are identified in Table 5.

Table 5 - Preliminary Project Schedule

Project Schedule	
Item	Estimated Completion
Submit PDI Report and IRM Work Plan	10/1/2025
30 Day Public Comment Period on PDI Report and IRM Work Plan and Fact Sheet	10/1/2025 – 10/31/2025
Community Availability Session	10/16/2025
PDI Report and IRM Work Plan revisions based on Public Comment Period	11/1/2025 – 12/1/2025
Review of Park Development Plans provided by City of Corning	11/15/2025
Supplemental PDI Investigation fieldwork	December 2025
Revised IRM Work Plan and comprehensive design drawings	February 2026
IRM Construction Fact Sheet	March 2026
IRM Construction	April/May 2026 – June 2026
Site Management Plan	Third Quarter 2026
Final Engineering Report	Fourth Quarter 2026

SECTION 7 REFERENCES

NYSDEC. 2010. DER-10, *Technical Guidance for Site Investigation and Remediation.* New York State Department of Environmental Conservation Program Policy. Issued May 3, 2010, with latest update April 9, 2019. https://www.dec.ny.gov/docs/remediation_hudson_pdf/der10.pdf

Parsons. 2022. *Site Characterization Report William Street Park Site Number 851055.* Prepared by Parsons for the New York State Department of Environmental Conservation Division of Environmental Remediation. May 2022.

Parsons. 2025a. *Pre-Design Investigation Work Plan William St. Park Site(Site ID #851055) Corning, Steuben County, New York.* Prepared by Parsons for the New York State Department of Environmental Conservation Environmental Cleanup Program. Revision date July 2025.

Parsons. 2025b. *Project Safety, Health, and Environmental Plan (PSHEP)*. Prepared by Parsons for the New York State Department of Environmental Conservation Environmental Cleanup Program. Revision date March 2025.

Parsons . 2025c. *2025 Pre-Design Investigation Data Summary Report For William Street Park Site Number: 851055.* Prepared by Parsons for the New York State Department of Environmental Conservation Division of Environmental Remediation. September 2025.

Parsons. 2020a. *Field Activities Plan (FAP)*. Prepared by Parsons for the New York State Department of Environmental Conservation Environmental Cleanup Program. April 2020.

Parsons. 2020b. *Generic Quality Assurance Project Plan (QAPP)*. Prepared by Parsons for the New York State Department of Environmental Conservation Environmental Cleanup Program. May 2020.

FIGURES

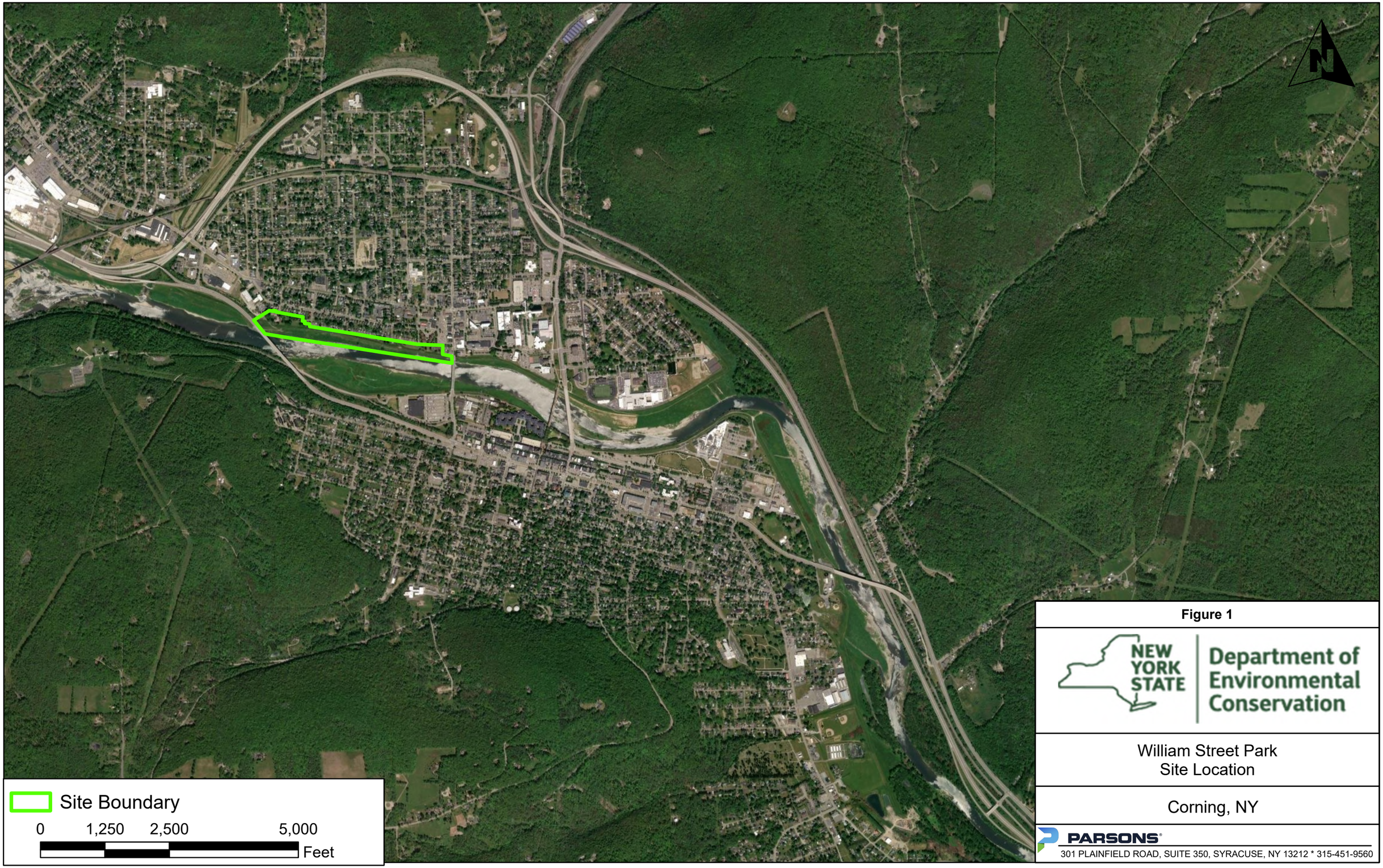

Figure 1

NEW YORK STATE | Department of Environmental Conservation

William Street Park
Site Location

Corning, NY

PARSONS
301 PLAINFIELD ROAD, SUITE 350, SYRACUSE, NY 13212 * 315-451-9560

W Pulteney St
Goff St
Pritchard Ave
Princeton Ave
Lost Wax Ln
Selenium Ln
Sly Ave
Tyrian Ln
299.19-05-025.000
299.18-01-024.200
Dunbar St
sell Ave
W William St
Woodlawn Ave
Driveway
Dodge Ave
Wallace St
317.07-01-037.000
Hillvue Ave
317.07-01-086.000
Gehl Ln
Bridge St
Parking Lot
Alley
Driveway
Park Ln
317.27-02-054.000
317.27-02-041.000
317.27-01-036.000
317.27-01-036.000
317.08-01-039.000
State Route 352
State Route
317.07-01-086.000

Approximate Toe of Berm
Approximate location of Abandoned Landfill
Site Boundary
Tax Parcel Boundary

0 200 400 800
Feet

Figure 2

NEW YORK STATE | Department of Environmental Conservation

William Street Park
Site Boundaries and Tax Parcels

Corning, NY

PARSONS
301 PLAINFIELD ROAD, SUITE 350, SYRACUSE, NY 13212 * 315-451-9560

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-B4 WSP-SB-B4-0-0.17 6/10/2025
Benzo(A)Pyrene	mg/kg	1	1.0
Benzo(B)Fluoranthene	mg/kg	1	1.4
Indeno(1,2,3-C,D)Pyrene	mg/kg	0.5	0.70

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-C2 WSP-SB-C2-0.17-1 7/8/2025
Benzo(B)Fluoranthene	mg/kg	1	1.5
Indeno(1,2,3-C,D)Pyrene	mg/kg	0.5	1.2

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-C7 WSP-SB-C7-0-0.17 7/8/2025
Benzo(A)Anthracene	mg/kg	1	6.0
Benzo(A)Pyrene	mg/kg	1	4.6
Benzo(B)Fluoranthene	mg/kg	1	5.9
Benzo(K)Fluoranthene	mg/kg	3.9	2.0
Chrysene	mg/kg	3.9	5.6
Dibenz(A,H)Anthracene	mg/kg	0.33	1.0
Indeno(1,2,3-C,D)Pyrene	mg/kg	0.5	2.6 J

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-08/08A WSP-SB-08/08A-0-0.5	WSP-SB-08/08A WSP-SB-08/08A-0.5-	WSP-SB-08/08A WSP-SB-08/08A-1-2
Arsenic	mg/kg	16	11.7	14.8	19.9
Barium	mg/kg	400	284	303	437 J+
Lead	mg/kg	400	623	551	675

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-02 WSP-SB-02-1-2
Barium	mg/kg	400	411 J+
Lead	mg/kg	400	502

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-03 WSP-SB-03-0.5-1	WSP-SB-03 WSP-SB-03-1-2	WSP-SB-03 WSP-SB-03-1-4
Arsenic	mg/kg	16	19.6	24	26.8
Cadmium	mg/kg	4.3	6.8	13.5	2.5
Lead	mg/kg	400	759	966	208
Benzo(A)Anthracene	ug/kg	1	650	1100	250
Benzo(A)Pyrene	ug/kg	1	860	1300	290
Benzo(B)Fluoranthene	ug/kg	1	1100	2100	400
Indeno(1,2,3-C,D)Pyrene	ug/kg	0.5	760	1000	230

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-04 WSP-SB-04-0-0.5	WSP-SB-04 WSP-SB-04-0.5-1	WSP-SB-04 WSP-SB-04-1-2
Arsenic	mg/kg	16	25.2	29.3	28.8
Barium	mg/kg	400	478	541	700
Cadmium	mg/kg	4.3	5.9	5.8	8.1
Lead	mg/kg	400	1560	1360	2300
Manganese	mg/kg	2000	701	662	3270

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-09 0 - 0.5 ft	WSP-SB-09 0.5 - 1 ft	WSP-SB-09 1 - 2 ft
Arsenic	mg/kg	16	11	10.1	21.6
Benzo(A)Anthracene	ug/kg	1	220 J	12000	46 J
Benzo(A)Pyrene	ug/kg	1	290 J	12000	44 J
Benzo(B)Fluoranthene	ug/kg	1	340 J	14000	86 J
Benzo(K)Fluoranthene	ug/kg	3.9	160 J	5500	ND
Chrysene	ug/kg	3.9	250 J	12000	62 J
Dibenz(A,H)Anthracene	ug/kg	0.33	ND	2300	ND
Indeno(1,2,3-C,D)Pyrene	ug/kg	0.5	230 J	6200	41 J

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-10 WSP-SB-10-0-0.5	WSP-SB-10 WSP-SB-10-0.5-1	WSP-SB-10 WSP-SB-10-1-2	WSP-SB-10 WSP-SB-10-1-2
Arsenic	mg/kg	16	13.7	19.8	17.8	28.6
Barium	mg/kg	400	120	209	261	425
Cadmium	mg/kg	4.3	9.3	18.2	3.5	5.3
Lead	mg/kg	400	432	1020	674	864
Mercury	mg/kg	2.8	0.19	0.66	1	0.75
Benzo(A)Anthracene	ug/kg	1	380 J	2200	620 J	1300 J
Benzo(A)Pyrene	ug/kg	1	540 J	2000	720 J	1600 J
Benzo(B)Fluoranthene	ug/kg	3.9	670 J	3600	890 J	1800 J
Dibenz(A,H)Anthracene	ug/kg	0.33	ND	490 J	180 J	320 J
Indeno(1,2,3-C,D)Pyrene	ug/kg	0.5	350 J	1400 J	470 J	990 J

Goff St

Hillvue Ave

State Route 352

State Route 352

- Boring with ABG
- Boring with No ABG
- SCR Samples with Exceedance
- Approximate Toe of Berm
- Approximate location of Abandoned Landfill
- Site Boundary
- Soil Sampling Grid (75x75ft)

0 100 200 400 Feet

Region 8 Steuben County

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Figure 3A - William Street Park (West)
PDI Results with ABG and Restricted Residential SCOs

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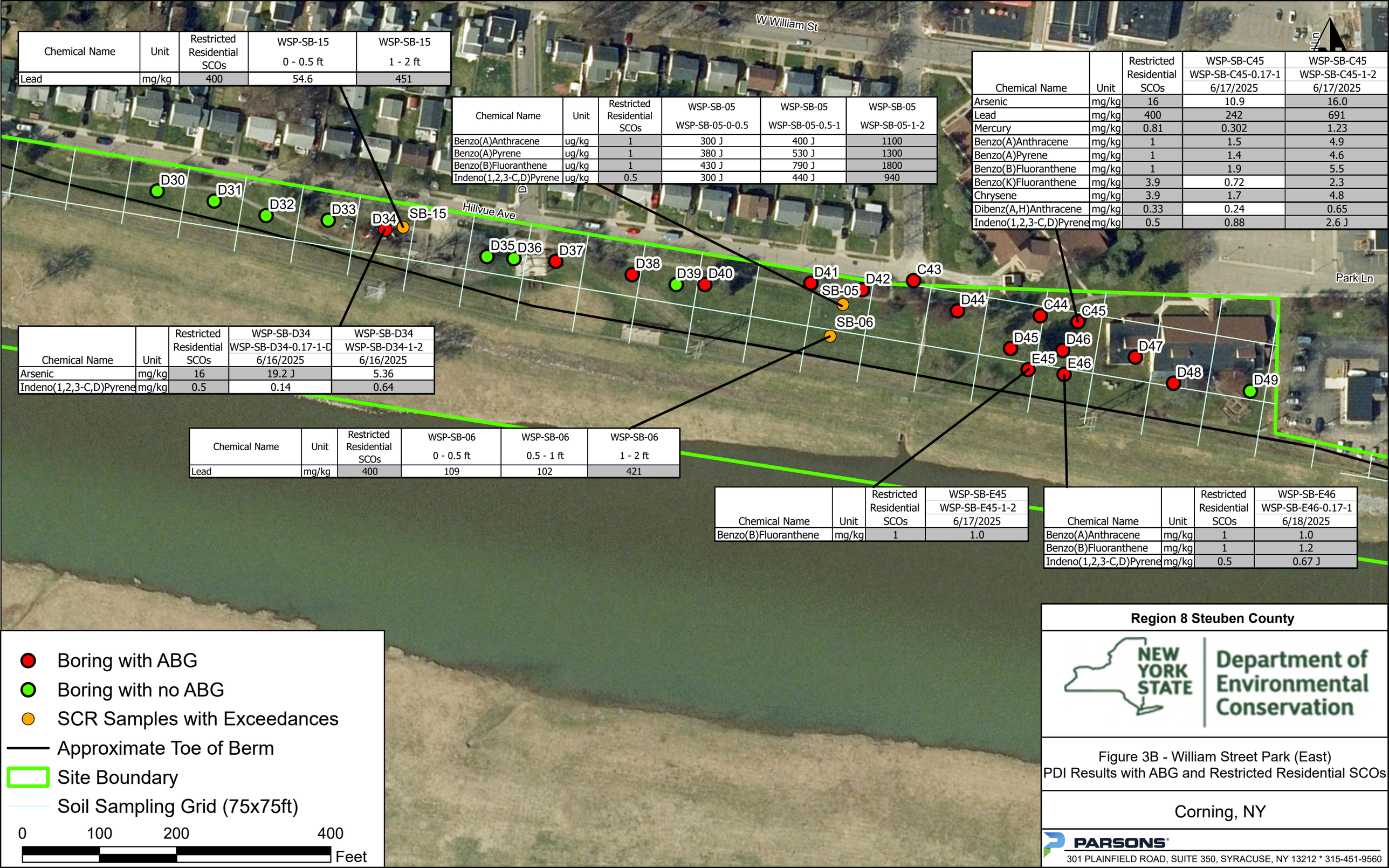

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-15 0 - 0.5 ft	WSP-SB-15 1 - 2 ft
Lead	mg/kg	400	54.6	451

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-05 WSP-SB-05-0-0.5	WSP-SB-05 WSP-SB-05-0.5-1	WSP-SB-05 WSP-SB-05-1-2
Benzo(A)Anthracene	ug/kg	1	300 J	400 J	1100
Benzo(A)Pyrene	ug/kg	1	380 J	530 J	1300
Benzo(B)Fluoranthene	ug/kg	1	430 J	790 J	1800
Indeno(1,2,3-C,D)Pyrene	ug/kg	0.5	300 J	440 J	940

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-C45 WSP-SB-C45-0.17-1 6/17/2025	WSP-SB-C45 WSP-SB-C45-1-2 6/17/2025
Arsenic	mg/kg	16	10.9	16.0
Lead	mg/kg	400	242	691
Mercury	mg/kg	0.81	0.302	1.23
Benzo(A)Anthracene	mg/kg	1	1.5	4.9
Benzo(A)Pyrene	mg/kg	1	1.4	4.6
Benzo(B)Fluoranthene	mg/kg	1	1.9	5.5
Benzo(K)Fluoranthene	mg/kg	3.9	0.72	2.3
Chrysene	mg/kg	3.9	1.7	4.8
Dibenz(A,H)Anthracene	mg/kg	0.33	0.24	0.65
Indeno(1,2,3-C,D)Pyrene	mg/kg	0.5	0.88	2.6 J

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-D34 WSP-SB-D34-0.17-1-D 6/16/2025	WSP-SB-D34 WSP-SB-D34-1-2 6/16/2025
Arsenic	mg/kg	16	19.2 J	5.36
Indeno(1,2,3-C,D)Pyrene	mg/kg	0.5	0.14	0.64

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-06 0 - 0.5 ft	WSP-SB-06 0.5 - 1 ft	WSP-SB-06 1 - 2 ft
Lead	mg/kg	400	109	102	421

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-E45 WSP-SB-E45-1-2 6/17/2025
Benzo(B)Fluoranthene	mg/kg	1	1.0

Chemical Name	Unit	Restricted Residential SCOs	WSP-SB-E46 WSP-SB-E46-0.17-1 6/18/2025
Benzo(A)Anthracene	mg/kg	1	1.0
Benzo(B)Fluoranthene	mg/kg	1	1.2
Indeno(1,2,3-C,D)Pyrene	mg/kg	0.5	0.67 J

- Boring with ABG
- Boring with no ABG
- SCR Samples with Exceedances
- Approximate Toe of Berm
- Site Boundary
- Soil Sampling Grid (75x75ft)

0 100 200 400 Feet

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Figure 3B - William Street Park (East)
PDI Results with ABG and Restricted Residential SCOs

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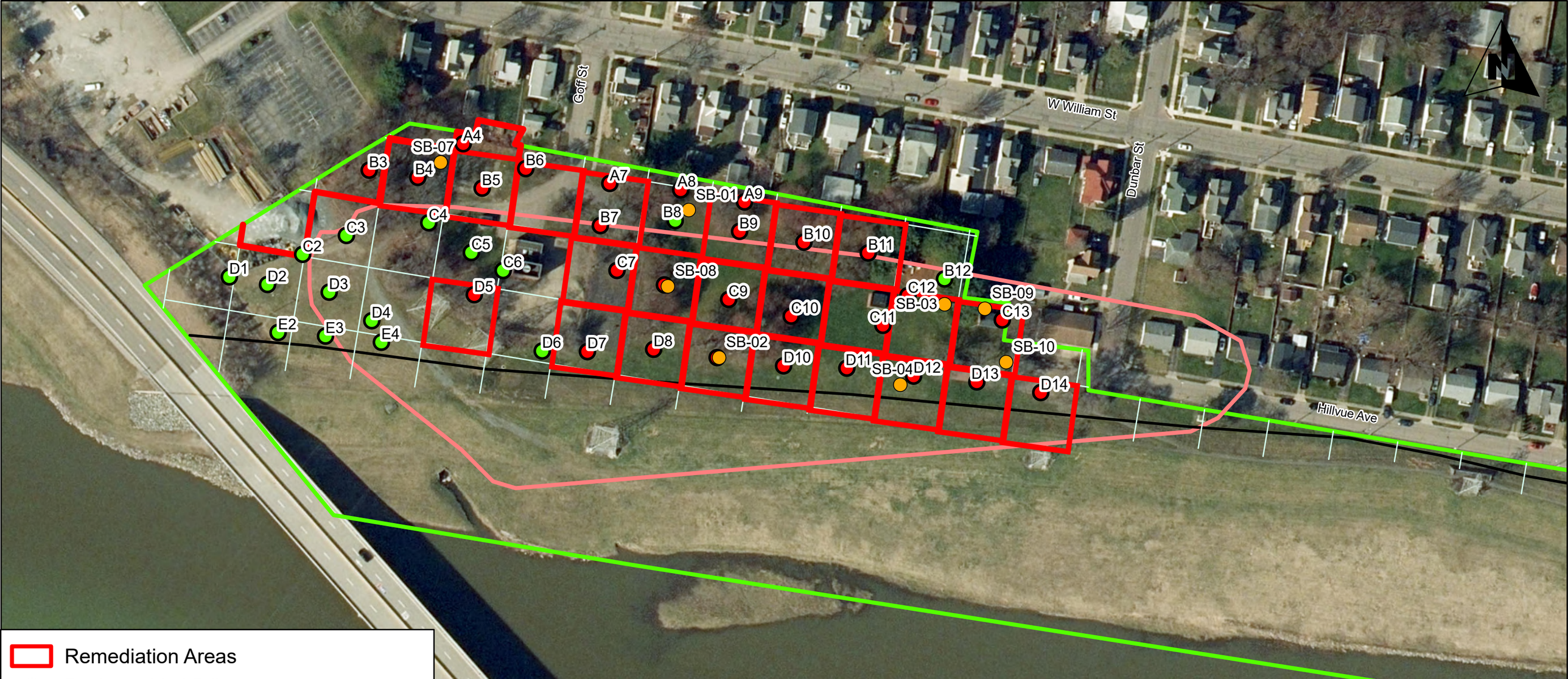

Remediation Areas
Boring with ABG
Boring with No ABG
SCR Samples with Exceedance
Approximate Toe of Berm
Approximate location of Abandoned Landfill
Site Boundary
Soil Sampling Grid (75x75ft)

0 100 200 400
Feet

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Figure 4A - William Street Park (West)
Grids Selected for Remediation

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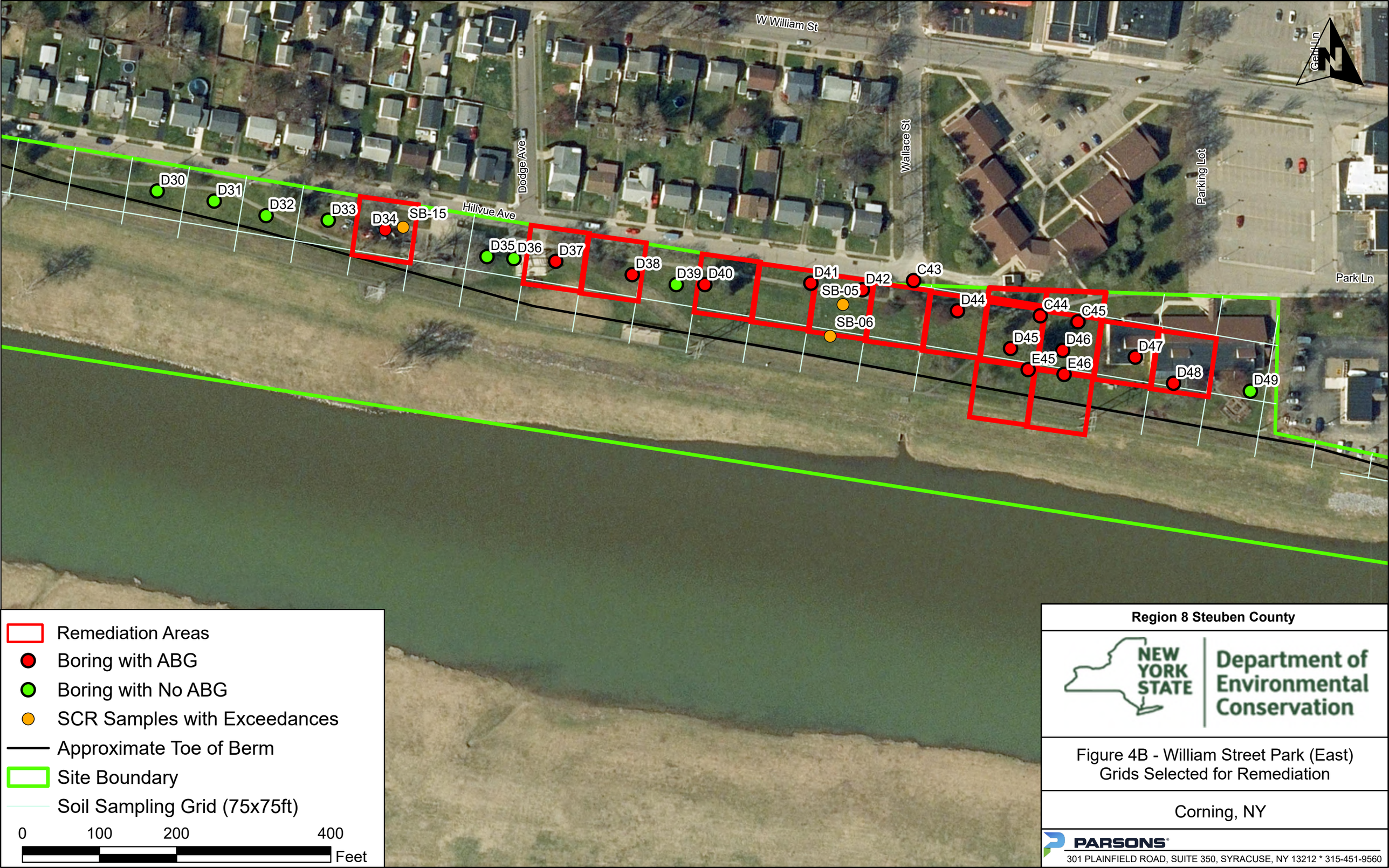

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Figure 4B - William Street Park (East)
Grids Selected for Remediation

Corning, NY

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APPENDIX A

COMMUNITY AIR MONITORING PLAN

APPENDIX A

New York State Department of Health
Generic Community Air Monitoring Plan

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical- specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for volatile organic compounds (VOCs) and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate NYSDEC/NYSDOH staff.

Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. "Periodic" monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

- If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.

- If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.

- If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

All 15-minute readings must be recorded and be available for State (DEC and DOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment must be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.

- If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m^3 above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m^3 of the upwind level and in preventing visible dust migration.

All readings must be recorded and be available for State (DEC and DOH) personnel to review.