

May 29, 2025

Abigail Beckman
NYS Department of Environmental Conservation, Region 7
Division of Environmental Remediation
5786 Widewaters Parkway
Syracuse, NY 13214

Re: Site Management Periodic Review Report
Site #: B00003
Site Name: Midtown Plaza
Site Address: 727 East Washington St., Syracuse, NY 13244

Dear Ms. Beckman:

This is an updated Periodic Review Report (PRR) for the former Midtown Plaza site at 727 East Washington St. in Syracuse, for the reporting periods of March 1, 2022 to March 1, 2025. This updated PRR is submitted in response to your May 15, 2025, letter requesting additional information and modification of the March 3, 2025 PRR originally submitted by the University for this reporting period. Updates made to the PRR are indicated in red for ease of identification.

I. Executive Summary

The former Midtown Plaza site (City Parcel) at 700 East Washington Street in Syracuse, NY, was purchased by Syracuse University in 2004 and redeveloped as the Syracuse University COE in Environmental and Energy Systems headquarters (current building address is 727 East Washington St.). Prior to purchase by Syracuse University, a Record of Decision (ROD) was issued for the site in March 1998 and the activities to implement the ROD, including demolition for the Midtown Plaza building at the site, were completed in June 1999.

Additional limited subsurface investigations were conducted by Syracuse University in conjunction with O'Brien and Gere Engineers and NYS Department of Environmental Conservation (NYS DEC) Region 7 Division of Environmental Remediation prior to purchase of the site and during the COE Campus Development Project. Contaminants, including asbestos debris, semi-volatile polycyclic hydrocarbons, heavy metals, and hexavalent chromium were identified to be present in the site's soils and groundwater at varying degrees.

Remediation of the site as part of the COE Campus Development Project began in the summer of 2006 under the NYSDEC approved Site Management Plan (SMP) for Construction of the TIEQ Laboratory and COE Headquarters, dated July 2005. The bulk of source removal efforts occurred from August 2006 through the summer of 2007 and additional source removal continued sporadically through the completion of the COE Campus Development Project in fall of 2010.

As mandated by the Construction SMP, a surface cover system consisting of no less than a 12-inch depth of NYSDEC approved impervious products was placed on all portions of the City Parcel that were redeveloped as part of the COE Campus Development Project. A Construction SMP Compliance Report & Certification and a Cover Placement Certification were submitted to NYSDEC in March 2011 for the portions of the City Parcel that were redeveloped during the COE Campus Development Project.

Remediation of the remainder of the site began in the May 2015 as part of the COE Intermodal Transportation Center (ITC) Project. Source removal efforts for the COE ITC Project were completed in September 2015 in accordance with the NYSDEC approved July 2005 Construction SMP. As required by the Construction SMP, a cover system consisting of no less than a 12-inch depth of NYSDEC approved products was placed on the remaining portions of the City Parcel that were redeveloped as part of the COE ITC Project. A Construction SMP Compliance Report and Certification and a Cover Placement Certification were submitted to NYSDEC on March 22, 2016, for the portions of the City Parcel that were redeveloped during the COE ITC Project.

The NYSDEC approved Post Construction SMP is being followed for the entire City Parcel. No deviations from the Post Construction SMP were identified or known to have occurred during the current reporting period.

An amended (May 2025) Post Construction SMP is submitted with this PRR for NYS DEC approval (Attachment D). Please advise if any other process is required to secure NYS approval of this amendment.

No changes to the Construction SMP or to the frequency of submittal for the PRR are requested at this time.

II. Site Overview

The former Midtown Plaza site at 700 East Washington Street is located in the City of Syracuse and is bordered by East Washington Street and East Water Street between Forman Avenue and Almond Street. The site was purchased by Syracuse University in 2004 and redeveloped in two separate phases. The first phase included construction of the Syracuse COE in Environmental and Energy Systems Headquarters (COE Campus Development Project). The second phase of redevelopment was for construction of the COE Intermodal Transportation Center (COE ITC Project). The COE Campus Development Project and the COE ITC Project involved redevelopment of the following two (2) adjacent parcels:

- 2.4 acre parcel formally owned by the City of Syracuse that was the site of the former Midtown Plaza building (City Parcel).
- 0.6 acre parcel formally owned by the City of Syracuse Industrial Development Agency (SIDA Parcel)

The City Parcel portion of the COE site was initially remediated by the City of Syracuse under the NYSDEC Environmental Restoration Program (ERP). A ROD was issued for the site by the NYSDEC in March 1998 and activities to implement the ROD, including demolition of the former Midtown Plaza building, were

completed in June 1999. The site was then identified by the NYS Governor's office, Syracuse University, and several private companies and academic institutions to be the location of the future NYS COE for Environmental and Energy Systems. Syracuse University acquired the property in 2004 and performed additional subsurface investigations during the COE Campus Development Project (spring 2006 - fall 2010) and the COE ITC Project (summer 2015).

The nature and extent of contamination at the City Parcel were defined through; (a) the investigation conducted by the City of Syracuse under the ERP project, (b) the University's environmental assessment review conducted by O'Brien and Gere Engineers, (c) NYSDEC investigations performed in the fall of 2004, and (d) University subsurface investigations performed during site redevelopment and construction activities.

Contaminants identified during the site investigations and/or encountered during site redevelopment include:

- Debris containing residual asbestos from demolition of the former Midtown Plaza building,
- Soil and debris containing semi-volatile polycyclic hydrocarbons,
- Soil containing heavy metals,
- Soil with visible staining from petroleum products from previous spills on-site and/or migrating on to the site from adjacent sites, and
- Hexavalent chromium in the groundwater (identified in one on-site monitoring well, T2).

Redevelopment activities on the City Parcel were governed by the July 2005 Construction SMP, which specified requirements for soil handling, re-use and disposal, community air monitoring, and other associated redevelopment activities, as well as a requirement to place a cover system on the City Parcel as part of the redevelopment work.

During the fall of 2010, redevelopment activities associated with the COE Campus Development Project were completed and the required cover system was installed on the areas of the City Parcel that were redeveloped as part of COE Campus Development Project. A Construction Compliance Report and compliance certifications from the construction manager and Syracuse University, confirming installation of the required cover system and adherence to the Construction SMP for the COE Campus Development Project were submitted to NYSDEC via correspondence dated March 28, 2011.

During the summer of 2015, excavation activities associated with the COE ITC Project were completed and the required cover system was installed on the remaining areas of the City Parcel that were not redeveloped during the COE Campus Development Project. A Construction Compliance Report and compliance certifications from the construction manager and Syracuse University, confirming installation of the required City Parcel Cover and adherence to the Construction SMP for the COE ITC Project, were submitted to NYSDEC via correspondence dated March 22, 2016.

Attachment A to this PRR includes a map of the COE site depicting the two historic parcels and the areas where the cover system was installed on each parcel.

III. Remediation Performance and Effectiveness

The redevelopment activities associated with the COE Campus Development Project and the COE ITC project are complete. The required cover system is in place and being maintained in accordance with the Post Construction SMP on the City Parcel.

IV. IC/EC Plan Compliance Report

A. IC/EC Requirements and Compliance

Land Use Restriction

Pursuant to an Amended and Restated Declaration of Covenants and Restrictions in Favor of the State of New York and New York State Department of Environmental Conservation, recorded on March 25, 2004 at Book 4824, Page 502 in the Onondaga County Clerk's Office, the property shall be used for "industrial, commercial and business uses" and "the commercial use of the Property will exclude activities such as day care centers." NYS DEC clarified in a June 28, 2005 letter to the University's outside counsel (Bond, Schoeneck & King), that educational uses as set forth in the University's agreement to purchase the property are permitted under the applicable deed restrictions.

The current use of the redeveloped site conforms to the requirements of the land use restrictions.

Site Management Plan - Construction (includes soil management requirements)

The Construction SMP was followed during redevelopment activities that have been completed on the City Parcel. **No redevelopment activities occurred during this reporting period.**

Cover System

A cover system consisting of NYSDEC approved impervious products including concrete, asphalt, and/or clean soil or stone was installed and remains in place at a depth of at least 12 inches across the entire City Parcel. A demarcation layer consisting of orange landscape fabric (mirafi) was placed below the cover system to distinguish the boundary between the cover and pre-existing fill.

In the Cover Certification submitted to NYSDEC (Chris Mannes) on March 22, 2016, the University certified that, to the best of its knowledge, a cover system consisting of NYSDEC approved impervious products and/or clean soil or stone of a substantially uniform depth of at least 12 inches and a demarcation layer of orange mirafi had been installed and remains in place on the City Parcel.

Site Management Plan - Post Construction

The Post Construction SMP is in effect for the City Parcel. Future development and maintenance activities in this area are required to follow the guidelines set forth in the Post Construction SMP.

At your request, the Post Construction SMP was amended (May 2025) to include the requirement for annual inspection and pressure field extension testing of the CoE building's soil vapor mitigation system and a figure depicting the locations of the system's permanent vacuum monitoring points. The May 2025 amended Post Construction SMP is included as Attachment D for NYS DEC approval.

Site Inspection

In accordance with Section 6 of the Post Construction SMP, annual site inspections of the City Parcel covered by this PRR were performed on October 20, 2022, October 3, 2023, and October 8, 2024. The inspections included a visual evaluation of the entire COE site to identify any weathering or impairments in the cover materials and a review of activities that could have disturbed the cover system. As indicated on the enclosed copies of completed site inspection forms (**Attachment B, updated to include corresponding photographic attachments**), no areas of significant impairment or concern were observed in the cover system during the annual site inspections. **Minor issues observed at the site during this reporting period include:**

- Cracking and erosion of site pavers has occurred over the years due to aging and weathering. **Affected pavers will be replaced and/or regraded using prepackaged, commercially purchased sand, by September 1, 2025. Receipts for the purchased sand and photographs of the repairs will be provided to you upon completion.**
- Rodent intrusion into the property soils was observed in 2022. The University took action to address this **by engaging an exterminator to remove the rodents from the site and regrading/refilling the intrusion holes with existing site cover materials and re-seeding the areas. (Note: The two areas where rodent intrusions were observed in 2022 are both elevated locations with significantly more than the required 12 inches of cover material).**

Soil Vapor Mitigation System Inspection

Annual inspections of the Soil Vapor Mitigation System (SVMS) function were performed in September 2022, October 2023, and October 2024, and confirmed the required minimum negative pressure of 0.003 inches of water is being maintained throughout the system. Copies of the completed inspection forms are included in Attachment E.

B. IC/EC Certification

A copy of the completed institutional and engineering controls certification form is included as **Attachment C** to this PRR.

V. Monitoring Plan Compliance Report - Not Applicable

VI. Operations and Maintenance Plan Compliance Report - Not Applicable

VII. Overall PRR Conclusions and Recommendations

No deviations of compliance were identified during this reporting period with regard to the institution and engineering controls in place for the City Parcel portion of the COE site.

An amended (May 2025) Post Construction SMP is submitted with this PRR for NYS DEC approval. Please advise if any other process is required to secure approval if this amendment.

The University is not requesting any changes to Construction SMP or to the frequency of submittal for the PRRs.

If you have any questions or require any additional information, please do not hesitate to contact me at your convenience.

Sincerely,

Rebecca J. Ponza

Rebecca Ponza
Director, Environmental Health & Safety Services

Attachment A - COE Site Map

Attachment B - Annual Site Inspection Forms (updated to include photographs)

Attachment C - IC/EC Certification Form

Attachment D - May 2025 Updated Post Construction SMP

Attachment E - Annual SVMS Inspection Forms