PROPOSED RECORD OF DECISION AMENDMENT
VETERANS NATURE STUDY AREA SITE

Town of Huntington / Suffolk County / Environmental Restoration Program Site No. B00013 May 2010

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

1.0 INTRODUCTION

The New York State Department of Environmental Conservation (Department) signed a Record of Decision (ROD) on January 14, 2003 which selected a remedy to address soils contamination at the Veteran's Nature Study Area (VNSA) Site. The Town of Huntington agreed to implement the remedy of capping the former Veterans Administration (VA) Landfill located on the former VA property donated to the town by the VA. The Veterans Nature Study Area (VNSA) site received a grant under the NYSDEC Environmental Restoration Program (ERP) to implement the landfill capping remedy. The Town of Huntington (Town) notified the Department in April 2010 that they would like to implement the more stringent remedy of excavation and off-site disposal identified in the feasibility study and presented in the Proposed Remedial Action Plan and Record of Decision (ROD).

A public comment period has been set for June 7 thru July 9, 2010 to provide an opportunity for you to comment on these proposed changes. A public meeting is scheduled for June 30, 2010 at the Bellerose Elementary School beginning at 7:00pm.

At the meeting, a description of the original ROD and the circumstances that have led to proposed changes in the ROD will be presented. After the presentation, a question and answer period will be held, during which you can submit verbal or written comments on the proposed changes. We encourage you to review this summary and attend the meeting.

Written comments may also be sent to:

Steven M. Scharf, P.E., Project Engineer
NYS Dept. of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, New York 12233-7015
518-402-9620

Comments will be summarized and responses provided in a Responsiveness Summary. The information here is a summary of what can be found in greater detail in reports that have been placed in the Administrative Record for the site. These documents are available at the following repositories:

NYSDEC Region 1 Headquarters	**East Northport Public Library**	**NYSDEC Central Office**
SUNY Stony Brook, Bldg. 40	**185 Larkfield Road**	**625 Broadway**
Stony Brook, NY 11790-2356	**East Northport, NY**	**Albany, NY 12233-7015**
Attn: William Fonda	**9:00am-9:00pm M-F**	**Attn: Steven Scharf, P.E.**
Aphrodite Montolvo	**(631)261-2313**	**518-402-9620**
631-444-0350		**Mon-Fri 7:30am-3:30pm**
Mon - Fri, 8:30 - 4:45	**Saturday 9:00am -5:00pm**	

The Department may modify or reject the proposed changes based on new information or public comments. Therefore, the public is encouraged to review and comment on this proposal.

2.0 SITE INFORMATION

2.1 Site Description: The VNSA site is an undeveloped 34-acre parcel located in Northport, Town of Huntington, Long Island. The site is largely wooded, with several unpaved roads, one paved road and a three-acre former disposal area in the middle of the site. There is a Veterans Administration hospital to the north of the site, an elementary school to the south and residences to the east (see Figure 1). Also to the north is the Town's Meadowlark Park, a 66-acre woodland site with recreational trails. Additional Town and Suffolk County parkland lies to the west (Knolls Park) and Southwest (Veterans Park), and contains heavily used active recreational amenities (synthetic turf fields, parking area, turf athletic field, Little League fields, handball, volley ball and basketball courts). Veterans Park is currently under construction to develop a new Boundless Playground and concrete skate park. The Veterans Nature Study Area is a permanent nature preserve with trails that are networked with other trails within the Veterans Park complex.

2.2 Site History: The property was owned by the Veteran's Administration and a small portion was used for the disposal of their solid waste. Dumping was done in open trenches along with the burning of trash and the disposal of hospital incinerator ash through the late 1960's. The property was conveyed to the Town in 1976 with the stipulation that it is used for environmental education purposes for a period of 30 years starting in 1985. However, due to concerns regarding site contamination, the Town closed the VNSA site park in 1994. The Town has been required to submit a report on site utilization to the U.S. Department of Education every two years. The status of the site remediation and potential alternatives remedy presently under consideration has been reported to the U.S. Department of Education by the Town.

Past Investigations: A Preliminary Site Assessment (PSA) was prepared and submitted by Dvirka and Bartilucci (D&B) in February 1995. This PSA report was prepared for the Town of Huntington. The PSA report recommended further investigation of the site. Group educational use was suspended following the initial site assessment.

The Town applied for a grant from the Department to do a site investigation (SI) and prepare the SI report and a remedial alternatives (RA) report. The Town hired Roux Associates to complete this work. The SI report was finalized in February 2001 and the RA report was finalized in June 2001.

Interim Remedial Measures (IRM): Twenty cubic yards of PCB-contaminated soil were excavated and removed from the "hotspot" area (greater than 50 ppm) and subsequently disposed in an off-site landfill in March/April 1999. After the IRM was performed, subsurface soils contained PCBs less than 10 ppm with subsequent sampling indicating PCBs up to 4.3 ppm in surface soils along the access roads.

2.3 Nature and Extent of Site Contamination

The Site Investigation (SI) included excavation and sampling of test pits and trenches, groundwater monitoring well installation and sampling, surface soil sampling and report preparation. Sampling of the fill material revealed the presence of polycyclic aromatic hydrocarbons (PAHs) and metals. There are elevated levels of lead due to the presence of ash-related fill material. Three fill material samples exceeded the USEPA hazardous waste criteria (TCLP) level for lead. It is estimated that the site contains 20,000 cubic yards of fill material. Depth to groundwater is between 138 and 166 feet below ground surface. Some site related contamination, slightly above groundwater standards, was detected in some of the monitoring wells.

The results of the SI revealed that the surface soil along dirt roads was contaminated with PCBs in various locations. Of the 31 sampling locations where PCBs were detected, five locations had concentrations above 1 ppm (soil cleanup level for residential soils) to 4.3 ppm and one location greater than 50 ppm (hazardous waste threshold). The IRM described in section 2.2 was performed to remove contaminated soil with these elevated PCB concentrations.

As described in the original ROD and other documents, many soil, fill and groundwater samples were collected at the site to characterize the nature and extent of contamination. The primary contaminants of concern also include poly-aromatic hydrocarbons (PAHs) and lead in the fill materials.

2.4 Summary of Human Exposure Pathways

Pathways which are known to or may exist at the site include potential ingestion of soil contaminated with PCBs above cleanup criteria and potential contact with subsurface fill materials impacted with lead and PAHs.

2.5 Summary of Environmental Assessment

Environmental exposure pathways or ecological risks identified for the Veterans Nature Study Area (VNSA) site are due to the elevated levels of lead, PAHs and PCBs present in site soils and/or in the fill materials. Three of the four TCLP samples failed for lead, indicating a potential for lead to leach into the groundwater.

2.6 Original Remedy

Based on the results of the SI, the Remedial Alternatives Report (RAR) and the screening of alternatives in the PRAP, Alternative 4 was selected for the VNSA Site. The original selected remedy consisted of:

- A remedial design program to allow for proper construction, maintenance, and monitoring;
- Consolidation of all PCB impacted soils above one (1) ppm from the surrounding pathways and placement under the cap;

- Consolidation of the fill materials to provide for proper cap slope to promote drainage and reduce the area that needs to be capped;
- Capping the fill area with an engineered cap consistent with applicable 6 NYCRR Part 360 regulations;
- Long term groundwater monitoring to ensure the effectiveness of the remedy. The need for continued long term monitoring will be evaluated after five years;
- appropriate deed restrictions; and
- Submit an annual certification to demonstrate that the engineered cap has been maintained.

3.0 DESCRIPTION OF PROPOSED CHANGES

3.1 New Information

The alternative for excavation and off-site disposal was evaluated in the feasibility study and proposed plan as Alternative 3. The Town re-evaluated the remedy based on the current projection of long term costs of maintaining a cap, the reduced value of the site that capping would create given the new park areas established to the west and the consolidated nature of the fill material and the permanence offered by removing all the fill materials. The Town then requested that excavation and off-site disposal Alternative be implemented. The Town also wants to reopen the VNSA parkland on the former VA property, as such use has been held in abeyance pending resolution of the site fill mitigation.

3.2 Proposed Changes

The proposed change to the VNSA site remedy would excavate and dispose off-site the fill materials in the former VA landfill. The Town of Huntington hired an engineer to evaluate the proposed changes. The Department reviewed the proposed change to the remedy and agreed to modify the remedy for the VNSA site to excavation and off-site disposal.

4.0 EVALUATION OF PROPOSED CHANGES

4.1 Remedial Goals

Goals for the cleanup of the site were established in the original ROD. The goals selected for this site have been established through the remedy selection process stated in 6 NYCRR Part 375-1.10. The overall remedial goal is to meet all standards, criteria and guidance (SCGs) and be protective of human health and the environment. At a minimum, the remedy selected must eliminate or mitigate all significant threats to the public health and to the environment presented by the hazardous substances disposed at the site through the proper application of scientific and engineering principles.
The goals selected for this site are:

- reduce, control, or eliminate any exposure to the contamination present within the soil/waste on the site;
- achieve 6 NYCRR Part 375 unrestricted soil cleanup objectives;
- prevent, to the extent practicable, the potential migration of site contaminants to groundwater;

- provide for attainment of SCGs for groundwater quality at the limits of the site;
- Allow the Town of Huntington to reopen the VNSA site and property to the public.

4.2 Evaluation Criteria

The original remedy presented in the January 2003 ROD and the proposed remedy is compared in this section. The criteria used to compare the remedial alternatives are defined in the regulation that directs the remediation of Environmental Restoration Program (ERP) sites in New York State (6 NYCRR Part 375). For each criterion, a brief description is provided. A detailed discussion of the evaluation criteria and comparative analysis is contained in the original Feasibility Study.

The first two evaluation criteria are called threshold criteria and must be satisfied in order for an alternative to be considered for selection.

1. **Protection of Human Health and the Environment.** This criterion is an overall evaluation of the ability of each alternative to protect public health and the environment. The proposed change to the remedy will be more protective of human health and the environment as all the waste materials will be completely removed from the site.

2. **Compliance with New York State Standards, Criteria, and Guidance (SCGs).** Compliance with SCGs addresses whether a remedy will meet environmental laws, regulations, and other standards and criteria. In addition, this criterion includes the consideration of guidance which the Department has determined to be applicable on a case-specific basis. With the total excavation and off-site disposal of the fill materials, all the standards, criteria and guidance for the VNSA site will be achieved. The most significant SCG is the soil clean-up criteria found in 6 New York Code Rules and regulations (NYCRR) Part 375.

The next five "primary balancing criteria" are used to compare the positive and negative aspects of each of the remedial strategies.

3. **Short-term Effectiveness.** The potential short-term adverse impacts of the remedial action upon the community, the workers, and the environment during the construction and/or implementation are evaluated. The length of time needed to achieve the remedial objectives is also estimated and compared against the original remedy. There are some potential short term impacts from the excavation and offsite disposal, as compared to the consolidation and capping remedy. These concerns will be addressed by the site monitoring and health and safety plan.

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

5. **Reduction of Toxicity, Mobility or Volume.** Preference is given to alternatives that permanently

and significantly reduce the toxicity, mobility or volume of the wastes at the site. Complete removal of the fill materials from the site will reduce the mobility and toxicity of these materials at the site by placing them in an engineered landfill. However, the actual volume of waste would not change for either the capping of the waste or removal of fill materials.

6. **Implementability.** The technical feasibility and administrative feasibility of implementing the original selected remedy and the amended remedy are evaluated. Technical feasibility includes the difficulties associated with the construction of the remedy and the ability to monitor its effectiveness. For administrative feasibility, the availability of the necessary personnel and materials is evaluated along with potential difficulties in obtaining specific operating approvals, access for construction, institutional controls, and so forth. The Town, through the evaluation by their engineer, has determined that removing the waste is a readily implementable program.

Each of the two remedies is readily implementable. Both would require about the equivalent amount of time. Consolidation, compacting and construction of the cap and recharge basin, or excavation and offsite disposal would take about six months to complete.

7. **Cost-Effectiveness.** Capital costs and annual operation, maintenance, and monitoring costs are estimated for each alternative and compared on a present worth basis. Although cost-effectiveness is the last balancing criterion evaluated, where two or more alternatives have met the requirements of the other criteria, it can be used as the basis for the final decision. Based on the re-evaluation, the Town of Huntington has determined that the capital cost of the amended remedy is similar to the capital cost of the original remedy, and the present worth cost of the amended remedy is slightly less.

This final criterion is considered a modifying criterion and is considered after evaluating those above. It is focused upon after public comments on the proposed ROD amendment have been received.

8. **Community Acceptance.** Concerns of the community regarding the proposed changes are evaluated. A responsiveness summary will be prepared that describes public comments received and the manner in which the Department will address the concerns raised. If the final remedy differs significantly from the proposed remedy in this ROD amendment, notices to the public will be issued describing the differences and reasons for the changes.

5.0 Summary of Proposed Changes

The Department is proposing to amend the Record of Decision (ROD) for the VNSA Site. The proposed changes include excavation and off-site disposal of all the site fill material, achievement of 6 NYCRR Part 375 unrestricted soil cleanup objectives, a sampling program to confirm the end point disposal of the excavated materials and re-planting the site with native vegetation. Should some residual impacts remain buried beneath the site post closure, a site management plan and institutional controls in the form of an environmental easement will be put in place.

The original remedy from the 2002 feasibility study had an estimated capital cost of $630,380, an annual cost of $9,000 and a present worth of $721,289. The estimated capital cost for the original remedy is $1,487,943 with an annual cost of $12,681 and a present worth of $1,561,320 using the June 2008 estimate developed by the Engineer for the Town during the design. The cost to construct the amended remedy of

excavation and offsite disposal is estimated to be $1,439,000 with no projected annual costs. This was reduced from the original estimate from the ROD of $4,342,400 based on the Town's engineer's calculations that more waste than originally projected can be segregated out as non-hazardous. The Town has signed a State Assistance Contract for an Environmental Restoration Program (ERP) grant and agreed to a cap of $1,669,000 for state assistance. Cost recovery actions, currently in progress through the New York State Department of Law, may generate additional revenues to cover costs for the Town on this project.

The elements of the proposed amended remedy include:

- A remedial design program to verify the components of the remedy and provide the details necessary for the design, construction and completion of the proposed remedial program;
- Excavation and off-site disposal to an appropriate facility of the entire site fill material and pathway soils above the unrestricted soil cleanup objectives with an appropriate site specific health and safety plan that will address the changes to the remedy;
- A sampling program to confirm the end point disposal of the excavated materials;
- re-vegetating the site to prevent erosion.
- Should some residual impacts remain buried beneath the site post closure, institutional controls in the form of an environmental easement and a site management plan will be put in place.

6.0 NEXT STEPS

As described above, there will be a public meeting and comment period on the proposed changes to the selected remedy. At the close of the comment period, the Department will evaluate the comments received and prepare a responsiveness summary which will be made available to the public. A notice describing the Department's final decision will be sent to all persons on the site mailing list.

If you have questions or need additional information you may contact any of the following:

NYSDEC
William Fonda
Citizen Participation Specialist
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Stony Brook, NY 11790-2356
631-444-0350
Mon - Fri, 8:30 - 4:45

NYSDEC
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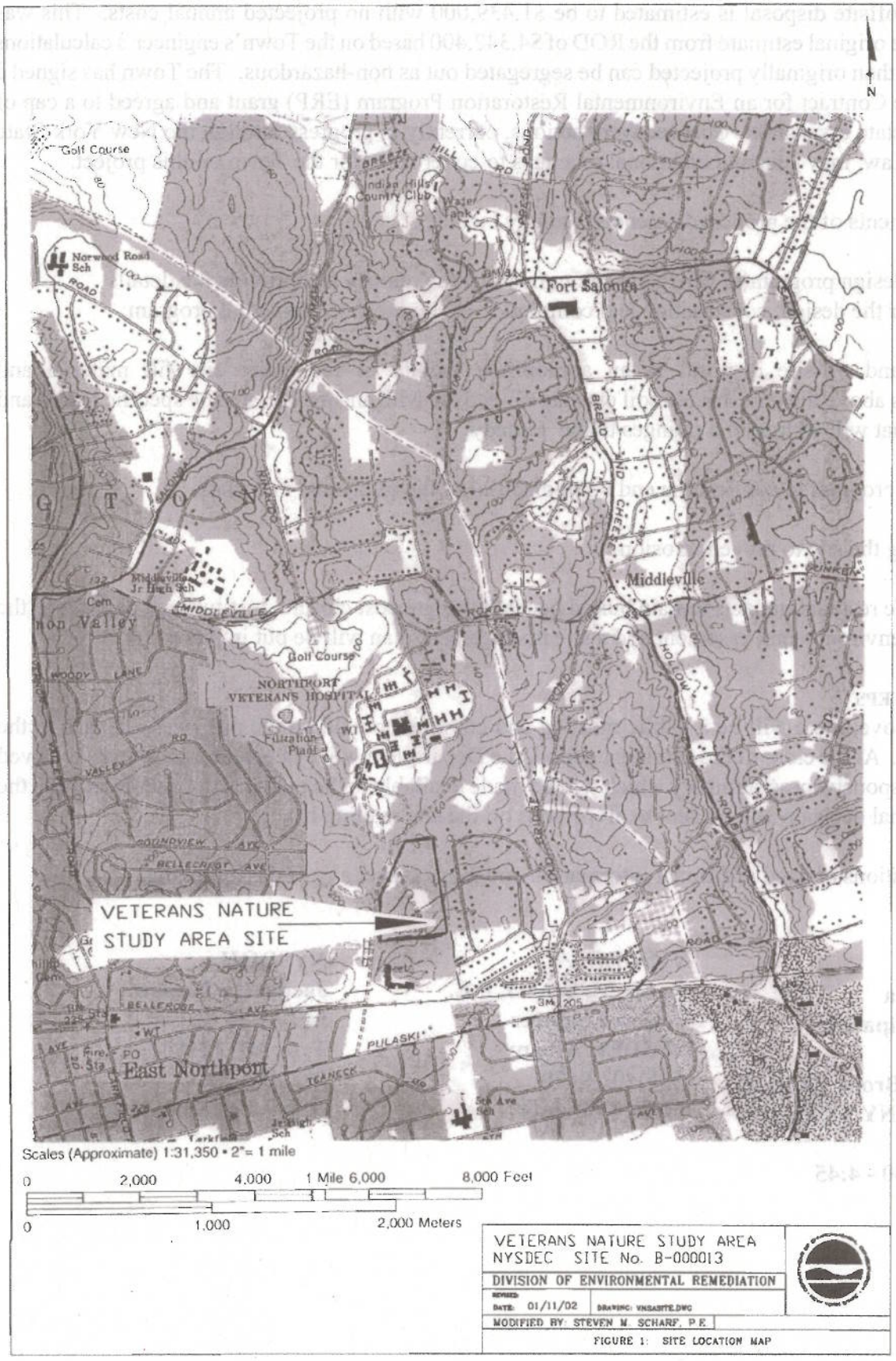
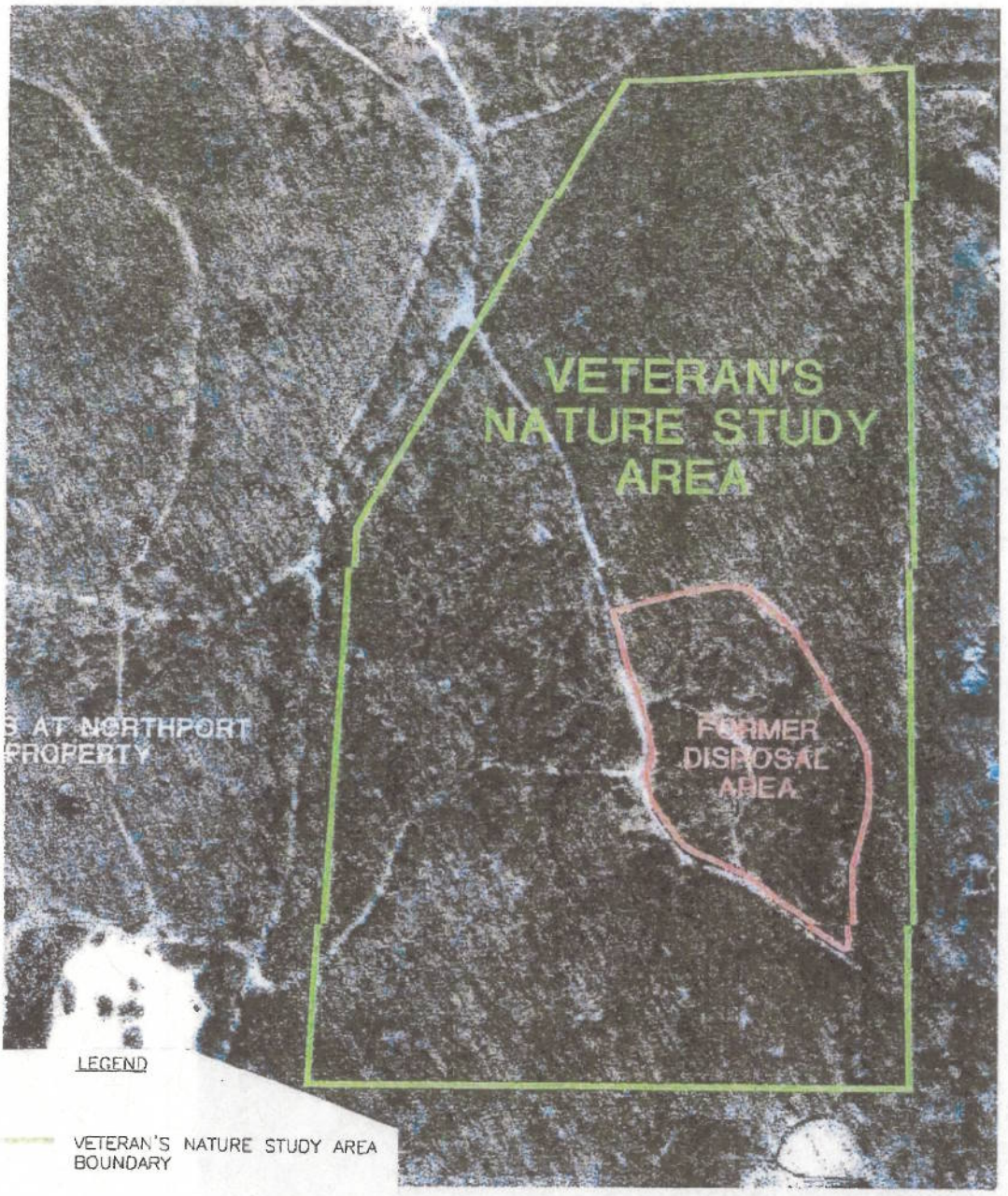


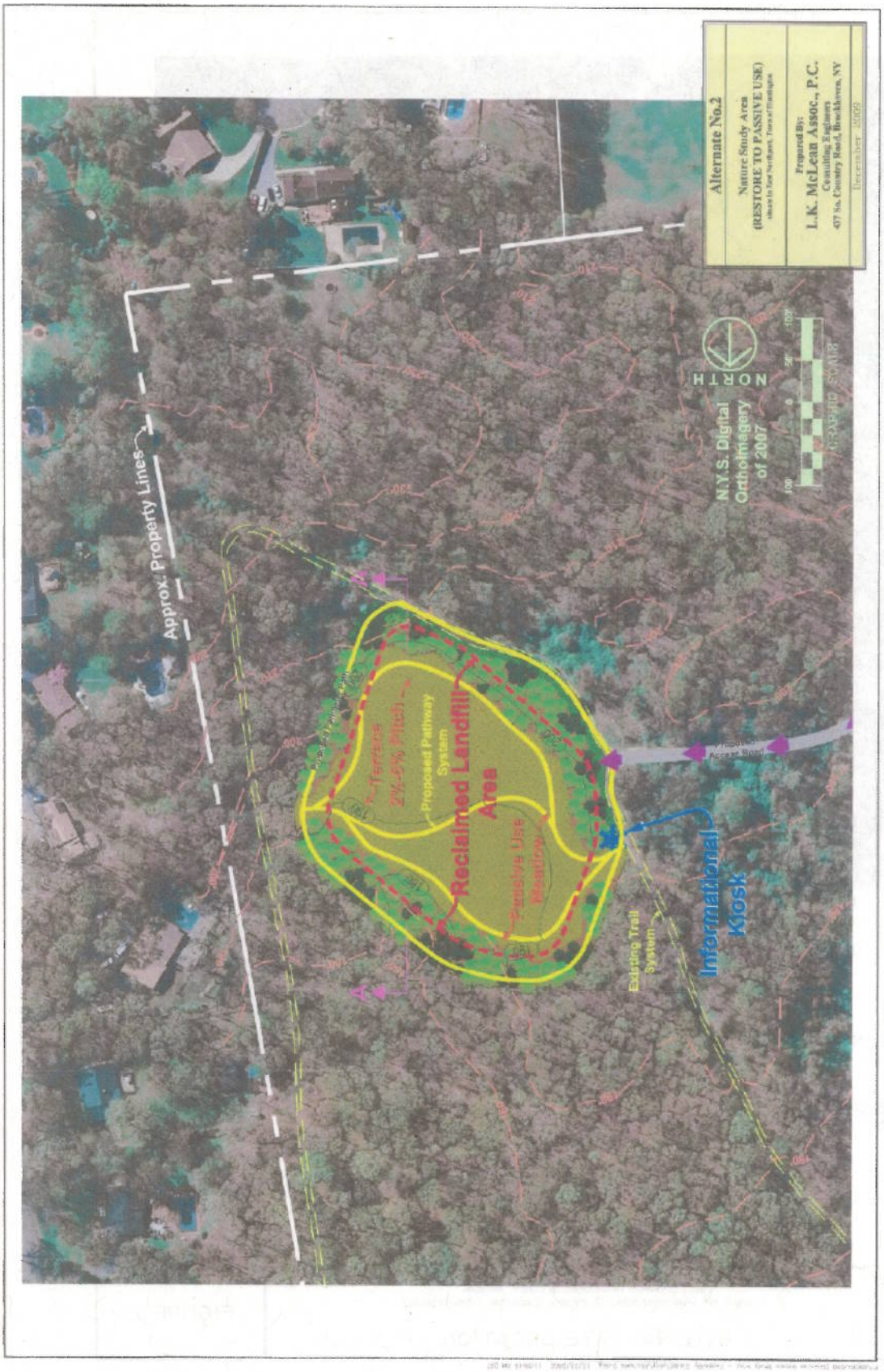
FIGURE 1: SITE LOCATION MAP



VETERANS NATURE STUDY AREA
TOWN OF HUNTINGTON, SUFFOLK COUNTY, NEW YORK

GENERAL SITE LOCATION

FIGURE 2


Alternate No.2
Nature Study Area
(RESTORE TO PASSIVE USE)
Prepared By:
L.K. McLean Assoc., P.C.
Consulting Engineers
437 So. Country Road, Brookhaven, NY
December 2005
NORTH
N.Y.S. Digital Orthoimagery of 2007
GRAPHIC SCALE
Approx. Property Lines
Reclaimed Landfill Area
Terrace 2%-5% Slope
Proposed Pathway System
Passive Use Meadow
Proposed Access Road
Existing Trail System
Informational Kiosk