DECISION DOCUMENT

146 Bayard
Brownfield Cleanup Program
Brooklyn, Kings County
Site No. C224294
June 2020

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

DECLARATION STATEMENT - DECISION DOCUMENT

146 Bayard
Brownfield Cleanup Program
Brooklyn, Kings County
Site No. C224294
June 2020

Statement of Purpose and Basis

This document presents the remedy for the 146 Bayard site, a brownfield cleanup site. The remedial program was chosen in accordance with the New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR) Part 375.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the 146 Bayard site and the public's input to the proposed remedy presented by the Department.

Description of Selected Remedy

The elements of the selected remedy are as follows:

1. Remedial Design

A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows;

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse gases and other emissions;
- Increasing energy efficiency and minimizing use of non-renewable energy;
- Conserving and efficiently managing resources and materials;
- Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;
- Maximizing habitat value and creating habitat when possible;
- Fostering green and healthy communities and working landscapes which balance ecological, economic and social goals; and
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.
- Additionally, to incorporate green remediation principles and techniques to the extent feasible in the future development at this site, any future on-site buildings will include, at

a minimum, a 20-mil vapor barrier/waterproofing membrane on the foundation to improve energy efficiency as an element of construction.

2. Excavation

Excavation and off-site disposal of contaminant source areas, including

- grossly contaminated soil, as defined in 6 NYCRR Part 375-1.2(u);
- soil exceeding the 6 NYCRR Part 371 hazardous criteria for lead;
- soils which exceed the protection of groundwater soil cleanup objectives (PGWSCOs), as defined by 6 NYCRR Part 375-6.8 for those contaminants found in site groundwater above standards;
- any underground storage tanks (USTs), fuel dispensers, underground piping or other structures associated with a source of contamination; and
- soils that create a nuisance condition, as defined in Commissioner Policy CP-51 Section G.

Excavation and off-site disposal of all on-site soils which exceed unrestricted soil cleanup objectives (SCOs), as defined by 6 NYCRR Part 375-6.8. If a Track 1 cleanup is achieved, a Cover System will not be a required element of the remedy.

Approximately 3,300 cubic yards of contaminated soil will be removed from the site**.** Excavation and removal of any underground storage tanks (USTs), fuel dispensers, underground piping or other structures associated with a source of contamination.

3. Backfill

Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to establish the designed grades at the site.

4. Vapor Intrusion Evaluation

As a part of the track 1 remedy, a soil vapor intrusion evaluation will be completed. The evaluation will include a provision for implementing actions recommended to address exposures related to soil vapor intrusion.

5. Groundwater Dewatering and Treatment

Dewatering will be performed to facilitate the excavation. Contaminated groundwater from dewatering operations will be treated as necessary prior to discharge to the municipal sewer system.

Conditional Track 1

The intent of the remedy is to achieve Track 1 unrestricted use; therefore, no environmental easement or site management plan is anticipated. If the soil vapor intrusion (SVI) evaluation is not completed prior to completion of the Final Engineering Report, then a Site Management Plan (SMP) and Environmental Easement (EE) will be required to address the SVI evaluation and implement actions as needed; if a mitigation or monitoring action is needed, a Track 1 cleanup can only be achieved if the mitigation system or other required action is no longer needed within 5 years of the date of the Certificate of Completion.

In the event that Track 1 unrestricted use is not achieved, including achievement of groundwater and soil vapor remedial objectives, the following contingent remedial elements will be required, and the remedy will achieve a Track 2 restricted residential cleanup.

Contingent Remedy Elements

6. Institutional Controls

Imposition of an institutional control in the form of an environmental easement for the controlled property that:

- requires the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
- allows the use and development of the controlled property for restricted residential use as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- restricts the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or NYCDOH; and
- requires compliance with the Department approved Site Management Plan.

7. Site Management Plan

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

a. an Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective:

   Institutional Controls: The Environmental Easement discussed in paragraph 6.

   This plan includes, but may not be limited to:

   - an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
   - descriptions of the provisions of the environmental easement including any land use and groundwater use restrictions;
   - a provision for evaluation of the potential for soil vapor intrusion for any occupied buildings on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
   - provisions for the management and inspection of the identified engineering controls;
   - maintaining site access controls and Department notification; and
   - the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.

b. Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:

   - a schedule of monitoring and frequency of submittals to the Department;
   - monitoring for vapor intrusion for any buildings on the site, as may be required by the Institutional and Engineering Control Plan discussed above.

Declaration

The remedy conforms with promulgated standards and criteria that are directly applicable, or that are relevant and appropriate and takes into consideration Department guidance, as appropriate. The remedy is protected of public health and the environment.

June 26, 2020

Date

Gerard Burke, Director
Remedial Bureau B

DECISION DOCUMENT

146 Bayard
Brooklyn, Kings County
Site No. C224294
June 2020

SECTION 1: SUMMARY AND PURPOSE

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), has selected a remedy for the above referenced site. The disposal of contaminants at the site has resulted in threats to public health and the environment that would be addressed by the remedy. The disposal or release of contaminants at this site, as more fully described in this document, has contaminated various environmental media. Contaminants include hazardous waste and/or petroleum.

The New York State Brownfield Cleanup Program (BCP) is a voluntary program. The goal of the BCP is to enhance private-sector cleanups of brownfields and to reduce development pressure on "greenfields." A brownfield site is real property, the redevelopment or reuse of which may be complicated by the presence or potential presence of a contaminant.

The Department has issued this document in accordance with the requirements of New York State Environmental Conservation Law and 6 NYCRR Part 375. This document is a summary of the information that can be found in the site-related reports and documents.

SECTION 2: CITIZEN PARTICIPATION

The Department seeks input from the community on all remedies. A public comment period was held, during which the public was encouraged to submit comment on the proposed remedy. All comments on the remedy received during the comment period were considered by the Department in selecting a remedy for the site. Site-related reports and documents were made available for review by the public at the following document repositories:

DECInfo Locator - Web Application
https://gisservices.dec.ny.gov/gis/dil/index.html?rs=C224294

Brooklyn Public Library - Greenpoint Branch
107 Norman Avenue
Brooklyn, NY 11222
Phone: (718) 349-8504

Brooklyn Community Board 1
435 Graham Avenue

Brooklyn, NY 11211
Phone: 718-389-0009

Receive Site Citizen Participation Information By Email

Please note that the Department's Division of Environmental Remediation (DER) is "going paperless" relative to citizen participation information. The ultimate goal is to distribute citizen participation information about contaminated sites electronically by way of county email listservs. Information will be distributed for all sites that are being investigated and cleaned up in a particular county under the State Superfund Program, Environmental Restoration Program, Brownfield Cleanup Program and Resource Conservation and Recovery Act Program. We encourage the public to sign up for one or more county listservs at http://www.dec.ny.gov/chemical/61092.html

SECTION 3: SITE DESCRIPTION AND HISTORY

Location:
The site is located in the Williamsburg neighborhood of Brooklyn, NY and is comprised of a single tax lot totaling 8,800 square feet (0.20 acres). The site is irregular shaped and is bounded on the north by Bayard Street and on the east by Graham Avenue. The west and south sides of the property are bordered by residential buildings.

Site Features:
The site is currently a vacant lot with no structures present. It is surrounded by an 8 ft high construction fence. The last known structure was demolished in 2018.

Current Zoning and Land Use:
The site is currently zoned M1-2/R6A (manufacturing with residential overlay). Surrounding land use to the west along Bayard Street are one- and two-family residential buildings. The adjacent properties to the south along Graham Avenue consist of three-story residential multi-family walk-up buildings and a three-story mixed residential and commercial building. To the north of the site, across Bayard Street, there are multiple residential one- and two-family buildings and two three-story mixed residential and commercial buildings. To the east of the property, across Graham Avenue, are several residential multi-family walk-up buildings and a single-story garage structure.

Past Use of the Site:
The site has been developed since at least 1887, with multiple dwellings fronting Bayard Street and multiple mixed-use storefronts along Graham Avenue. The site was identified with a manufacturing use on Sanborn maps from 1965 through 2007. The site was redeveloped between 1965 and 1978 with the recently demolished one-story building. A certificate of occupancy from NYC Buildings Department indicated the on-site manufacturing building completed construction in April 1972. The recently demolished building was last occupied by a floor manufacturing company which used/stored wood stains, varnishes, paint, paint thinners, floor sealants, and floor oil.

Site Geography and Geology:
Subsurface soils at the site consist of historic fill materials to a depth of approximately 6 feet below grade, followed by native silty-sand and clay. According to the USGS topographic map for the area (Brooklyn Quadrangle), the elevation of the site is approximately 20 feet above mean sea level. The topography within the immediate area slopes gradually from east to west.

Groundwater occurs beneath the site at a depth of approximately 7.5-9.5 feet below grade. Based on groundwater flow maps, the flow direction is generally toward the southeast.

A site location map is attached as Figure 1.

SECTION 4: LAND USE AND PHYSICAL SETTING

The Department may consider the current, intended, and reasonably anticipated future land use of the site and its surroundings when evaluating a remedy for soil remediation. For this site, alternatives (or an alternative) that restrict(s) the use of the site to restricted-residential use (which allows for commercial use and industrial use) as described in Part 375-1.8(g) were/was evaluated in addition to an alternative which would allow for unrestricted use of the site.

A comparison of the results of the Remedial Investigation (RI) to the appropriate standards, criteria and guidance values (SCGs) for the identified land use and the unrestricted use SCGs for the site contaminants is available in the RI Report.

SECTION 5: ENFORCEMENT STATUS

The Applicant(s) under the Brownfield Cleanup Agreement is a/are Volunteer(s). The Applicant(s) does/do not have an obligation to address off-site contamination. However, the Department has determined that this site does not pose a significant threat to public health or the environment; accordingly, no enforcement actions are necessary.

SECTION 6: SITE CONTAMINATION

6.1: Summary of the Remedial Investigation

A remedial investigation (RI) serves as the mechanism for collecting data to:

- characterize site conditions;
- determine the nature of the contamination; and
- assess risk to human health and the environment.

The RI is intended to identify the nature (or type) of contamination which may be present at a site and the extent of that contamination in the environment on the site, or leaving the site. The RI reports on data gathered to determine if the soil, groundwater, soil vapor, indoor air, surface water or sediments may have been contaminated. Monitoring wells are installed to assess groundwater and soil borings or test pits are installed to sample soil and/or waste(s) identified. If other natural resources are present, such as surface water bodies or wetlands, the water and

sediment may be sampled as well. Based on the presence of contaminants in soil and groundwater, soil vapor will also be sampled for the presence of contamination. Data collected in the RI influence the development of remedial alternatives. The RI report is available for review in the site document repository and the results are summarized in section 6.3.

The analytical data collected on this site includes data for:

- groundwater
- soil
- soil vapor

6.1.1: Standards, Criteria, and Guidance (SCGs)

The remedy must conform to promulgated standards and criteria that are directly applicable or that are relevant and appropriate. The selection of a remedy must also take into consideration guidance, as appropriate. Standards, Criteria and Guidance are hereafter called SCGs.

To determine whether the contaminants identified in various media are present at levels of concern, the data from the RI were compared to media-specific SCGs. The Department has developed SCGs for groundwater, surface water, sediments, and soil. The NYSDOH has developed SCGs for drinking water and soil vapor intrusion. For a full listing of all SCGs see: http://www.dec.ny.gov/regulations/61794.html

6.1.2: RI Results

The data have identified contaminants of concern. A "contaminant of concern" is a contaminant that is sufficiently present in frequency and concentration in the environment to require evaluation for remedial action. Not all contaminants identified on the property are contaminants of concern. The nature and extent of contamination and environmental media requiring action are summarized below. Additionally, the RI Report contains a full discussion of the data. The contaminant(s) of concern identified at this site is/are:

benzo(a)anthracene	mercury
benzo(a)pyrene	arsenic
benzo(b)fluoranthene	DDT
benzo(k)fluoranthene	chlordane
chrysene	methyl-tert-butyl ether (MTBE)
dibenz[a,h]anthracene	xylene (mixed)
indeno(1,2,3-CD)pyrene	DDD
barium	DDE
lead	chromium

The contaminant(s) of concern exceed the applicable SCGs for:

- groundwater
- soil

6.2: Interim Remedial Measures

An interim remedial measure (IRM) is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before issuance of the Decision Document.

There were no IRMs performed at this site during the RI.

6.3: Summary of Environmental Assessment

This section summarizes the assessment of existing and potential future environmental impacts presented by the site. Environmental impacts may include existing and potential future exposure pathways to fish and wildlife receptors, wetlands, groundwater resources, and surface water. The RI report presents a detailed discussion of any existing and potential impacts from the site to fish and wildlife receptors.

Soil and groundwater were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, polychlorinated biphenyls (PCBs), pesticides, and emerging contaminants (ECs). Soil vapor was analyzed for VOCs. Based upon investigations conducted to date, the primary contaminants of concern include SVOCs and metals.

Nature and Extent of Contamination:

Soil - Petroleum-related VOCs were found at concentrations exceeding the unrestricted use soil cleanup objectives (UUSCOs) in one soil boring performed beneath the former wood finishing room, including xylenes at a maximum concentration of 0.6 parts per million (ppm) (UUSCO is 0.26 ppm). Several SVOCs were detected at concentrations exceeding the UUSCOs in the shallow fill layer across the site, including benzo(a)anthracene at a maximum of 40 ppm compared to the UUSCO of 1 ppm, benzo(a)pyrene at 29 ppm (UUSCO is 1 ppm), benzo(b)fluoranthene at 30 ppm (UUSCO is 1 ppm), benzo(k)fluoranthene at 29 ppm (UUSCO is 0.8 ppm), chrysene at 42 ppm (UUSCO is 1 ppm), dibenz(a,h)anthracene at 5.1 ppm (UUSCO is 0.33 ppm), and indeno(1,2,3-cd)pyrene at 19 ppm (UUSCO is 0.5 ppm). Metals are also present in site soils, including barium at 1,770 ppm (UUSCO is 350 ppm), lead at 1,340 ppm (UUSCO is 63 ppm), and mercury at 2.54 ppm (UUSCO is 0.18 ppm). Several pesticides were detected at concentrations exceeding the UUSCOs, including 4,4-DDT at 0.15 ppm (UUSCO is 0.0033 ppm) and chlordane at 0.11 ppm (UUSCO is 0.094 ppm). No PCBs were detected at concentrations exceeding the UUSCOs. Data does not indicate any off-site impacts in soil related to this site.

Groundwater - One VOC, methyl t-butyl ether, was detected at a maximum concentration of 230 parts per billion (ppb), exceeding its respective ambient water quality standard (AWQS) of 10 ppb. SVOCs detected included benzo(a)anthracene (maximum 0.34 ppb), benzo(b)fluoranthene (maximum 0.24 ppb), benzo(k)fluoranthene (maximum 0.24 ppb), chrysene (maximum 0.3 ppb), and indeno(1,2,3-cd)pyrene (maximum 0.16 ppb), all above their respective AWQS of 0.002 ppb. Dissolved metals detected included arsenic at 64 ppb (AWQS is 25 ppb). Levels of PFOS and/or PFOA were detected above the NYSDEC screening level of 10 ppt, with PFOS at a

maximum concentration of 16.4 parts per trillion (ppt) and PFOA at 188 ppt. No PCBs were detected above AWQS. Data does not indicate any off-site impacts in groundwater related to this site.

Soil Vapor - The petroleum-related VOC xylene was detected at a maximum concentration of 149 micrograms per cubic meter (ug/m3). In addition, several chlorinated VOCs were found at low concentrations including tetrachloroethene at 11 ug/m3 and trichloroethene at 2.43 ug/m3. Data does not indicate any off-site impacts in soil vapor related to this site.

6.4: Summary of Human Exposure Pathways

This human exposure assessment identifies ways in which people may be exposed to site-related contaminants. Chemicals can enter the body through three major pathways (breathing, touching or swallowing). This is referred to as *exposure.*

The site is completely fenced, which restricts public access. However, persons who enter the site could contact contaminants in the soil by walking on the site, digging or otherwise disturbing the soil. Contaminated groundwater at the site is not used for drinking or other purposes and the site is served by a public water supply that obtains water from a different source not affected by this contamination. Volatile organic compounds in soil vapor (air spaces within the soil) may move into buildings and affect the indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. Because the site is vacant, the inhalation of site-related contaminants due to soil vapor intrusion does not represent a current concern. Furthermore, environmental sampling indicates soil vapor intrusion is not a concern for off-site buildings.

6.5: Summary of the Remediation Objectives

The objectives for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375. The goal for the remedial program is to restore the site to pre-disposal conditions to the extent feasible. At a minimum, the remedy shall eliminate or mitigate all significant threats to public health and the environment presented by the contamination identified at the site through the proper application of scientific and engineering principles.

The remedial action objectives for this site are:

Groundwater

RAOs for Public Health Protection

- Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards.
- Prevent contact with, or inhalation of volatiles, from contaminated groundwater.

RAOs for Environmental Protection

- Remove the source of ground or surface water contamination.

Soil

RAOs for Public Health Protection

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

RAOs for Environmental Protection

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

Soil Vapor

RAOs for Public Health Protection

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

SECTION 7: ELEMENTS OF THE SELECTED REMEDY

The alternatives developed for the site and the evaluation of the remedial criteria are presented in the Alternative Analysis. The remedy is selected pursuant to the remedy selection criteria set forth in DER-10, Technical Guidance for Site Investigation and Remediation and 6 NYCRR Part 375.

The selected remedy is a Conditional Track 1 remedy.

The selected remedy is referred to as the Excavation remedy.

The elements of the selected remedy, as shown in Figure 2, are as follows:

1. Remedial Design

A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows;

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse gases and other emissions;
- Increasing energy efficiency and minimizing use of non-renewable energy;
- Conserving and efficiently managing resources and materials;
- Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;
- Maximizing habitat value and creating habitat when possible;
- Fostering green and healthy communities and working landscapes which balance ecological, economic and social goals; and
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.
- Additionally, to incorporate green remediation principles and techniques to the extent feasible in the future development at this site, any future on-site buildings will include, at

a minimum, a 20-mil vapor barrier/waterproofing membrane on the foundation to improve energy efficiency as an element of construction.

2. Excavation

Excavation and off-site disposal of contaminant source areas, including

- grossly contaminated soil, as defined in 6 NYCRR Part 375-1.2(u);
- soil exceeding the 6 NYCRR Part 371 hazardous criteria for lead;
- soils which exceed the protection of groundwater soil cleanup objectives (PGWSCOs), as defined by 6 NYCRR Part 375-6.8 for those contaminants found in site groundwater above standards;
- any underground storage tanks (USTs), fuel dispensers, underground piping or other structures associated with a source of contamination; and
- soils that create a nuisance condition, as defined in Commissioner Policy CP-51 Section G.

Excavation and off-site disposal of all on-site soils which exceed unrestricted soil cleanup objectives (SCOs), as defined by 6 NYCRR Part 375-6.8. If a Track 1 cleanup is achieved, a Cover System will not be a required element of the remedy.

Approximately 3,300 cubic yards of contaminated soil will be removed from the site**.** Excavation and removal of any underground storage tanks (USTs), fuel dispensers, underground piping or other structures associated with a source of contamination.

3. Backfill

Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to establish the designed grades at the site.

4. Vapor Intrusion Evaluation

As a part of the track 1 remedy, a soil vapor intrusion evaluation will be completed. The evaluation will include a provision for implementing actions recommended to address exposures related to soil vapor intrusion.

5. Groundwater Dewatering and Treatment

Dewatering will be performed to facilitate the excavation. Contaminated groundwater from dewatering operations will be treated as necessary prior to discharge to the municipal sewer system.

Conditional Track 1

The intent of the remedy is to achieve Track 1 unrestricted use; therefore, no environmental easement or site management plan is anticipated. If the soil vapor intrusion (SVI) evaluation is not completed prior to completion of the Final Engineering Report, then a Site Management Plan (SMP) and Environmental Easement (EE) will be required to address the SVI evaluation and implement actions as needed; if a mitigation or monitoring action is needed, a Track 1 cleanup can only be achieved if the mitigation system or other required action is no longer needed within 5 years of the date of the Certificate of Completion.

In the event that Track 1 unrestricted use is not achieved, including achievement of groundwater and soil vapor remedial objectives, the following contingent remedial elements will be required, and the remedy will achieve a Track 2 restricted residential cleanup.

Contingent Remedy Elements

6. Institutional Controls

Imposition of an institutional control in the form of an environmental easement for the controlled property that:

- requires the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
- allows the use and development of the controlled property for restricted residential use as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- restricts the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or NYCDOH; and
- requires compliance with the Department approved Site Management Plan.

7. Site Management Plan

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

a. an Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective:

   Institutional Controls: The Environmental Easement discussed in paragraph 6.

   This plan includes, but may not be limited to:

   - an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
   - descriptions of the provisions of the environmental easement including any land use and groundwater use restrictions;
   - a provision for evaluation of the potential for soil vapor intrusion for any occupied buildings on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
   - provisions for the management and inspection of the identified engineering controls;
   - maintaining site access controls and Department notification; and
   - the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.

b. Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:

   - a schedule of monitoring and frequency of submittals to the Department;
   - monitoring for vapor intrusion for any buildings on the site, as may be required by the Institutional and Engineering Control Plan discussed above.

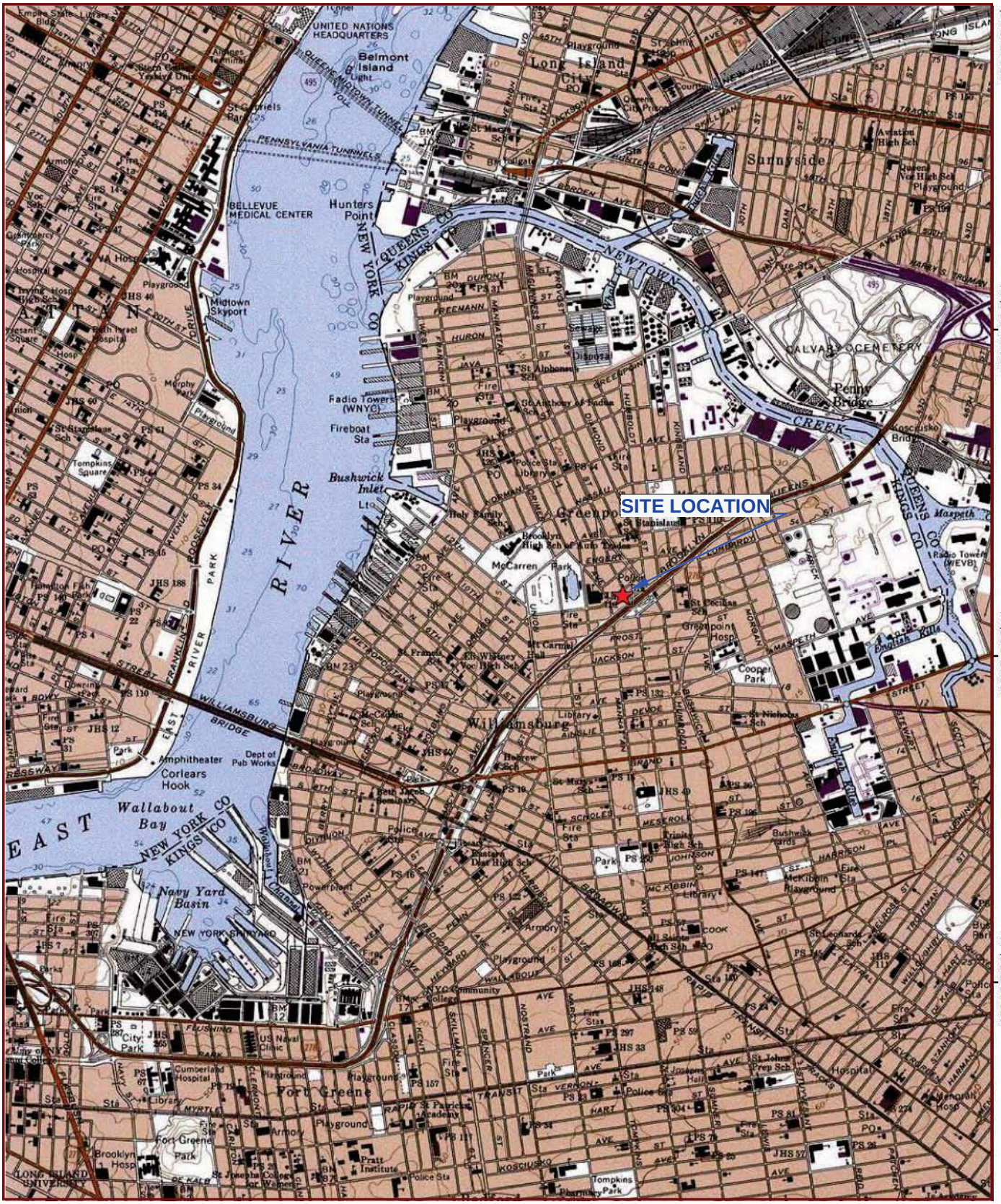

	Figure No. **1**	Site Name: 146 Bayard Street Site Address: 146 Bayard Street, Brooklyn, NY Drawing Title: Site Location Map

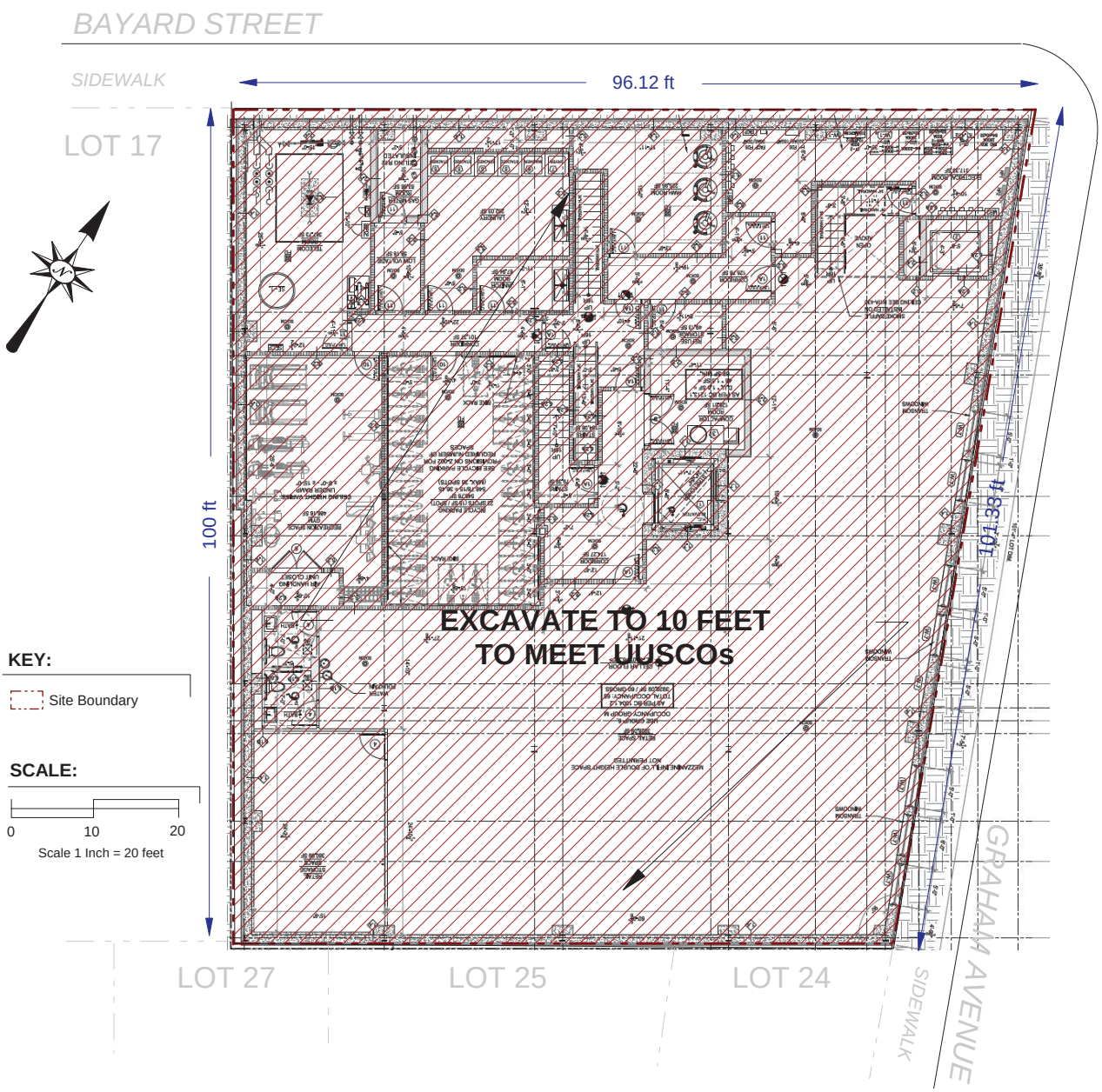

Figure No. 2	Site Name: 146 Bayard
	Site Address: 146 Bayard Street, Brooklyn, NY
	Drawing Title: Excavation Plan