DECISION DOCUMENT

33 Franklin
Brownfield Cleanup Program
Brooklyn, Kings County
Site No. C224303
June 2021

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

DECLARATION STATEMENT - DECISION DOCUMENT

33 Franklin
Brownfield Cleanup Program
Brooklyn, Kings County
Site No. C224303
June 2021

Statement of Purpose and Basis

This document presents the remedy for the 33 Franklin 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 33 Franklin 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;
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development; and
- 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

The existing on-site building(s) will be demolished and materials which cannot be beneficially reused on site will be taken off-site for proper disposal in order to implement the remedy.

Excavation and off-site disposal of all on-site soils which exceed unrestricted 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.

Soil removal and disposal is estimated to extend from surface grade to about 4 feet below sidewalk grade across the site footprint, with additional excavation as needed to meet Unrestricted Use SCOs.

Approximately 3,707 cubic yards of contaminated soil will be removed from the site.

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

3. Vapor Intrusion Evaluation

As 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.

Local Institutional Controls

If no Environmental Easement (EE) or Site Management Plan (SMP) is needed to achieve soil or soil vapor remedial action objectives, then the following local use restriction will be relied upon to prevent ingestion of groundwater: Article 141 of the New York City Department of Health and Mental Hygiene code which prohibits potable use of groundwater without prior approval.

<u>Contingent Track 1</u>

The intent of the remedy is to achieve Track 1 unrestricted use; therefore, no environmental easement or site management plan is anticipated.

In the event that Track 1 unrestricted use is not achieved, or if the vapor intrusion evaluation is not completed prior to completion of the Final Engineering Report, the following contingent remedial elements will be required, and the remedy will achieve a minimum Track 4 Restricted-residential use cleanup.

4. Cover System

A site cover will be required to allow for restricted residential use of the site in areas where the upper two feet of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where a soil cover is to be used it will be a minimum of two feet of soil placed over a demarcation layer, with the upper six inches of soil of sufficient quality to maintain a vegetative layer. Soil cover material, including any fill material brought to the site, will meet the SCOs for

cover material for the use of the site as set forth in 6 NYCRR Part 375-6.7(d). Substitution of other materials and components may be allowed where such components already exist or are a component of the tangible property to be placed as part of site redevelopment. Such components may include, but are not necessarily limited to: pavement, concrete, paved surface parking areas, sidewalks, building foundations and building slabs.

If the excavation achieves restricted residential SCO to a depth of at least 15 feet and all source material is removed, a Track 2 restricted residential cleanup will be achieved, and a Cover System will not be a required element of the remedy.

5. Institutional Control

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 controls in accordance with Part 375-1.8 (h)(3);
- allows the use and development of the controlled property for restricted-residential, commercial and industrial uses 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 County DOH; and
- requires compliance with the Department approved Site Management Plan.

6. 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 5 above.
   - Engineering Controls: The Cover System discussed in Paragraph 4 above.

   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;
   - a provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in Paragraph 4 above will be placed in any areas where the upper two feet of exposed surface soil exceed the applicable soil cleanup objectives (SCOs);
   - 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) a Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:
   - monitoring of soil vapor to assess the performance and effectiveness of the remedy;
   - 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 protective of public health and the environment.

June 25, 2021

Date

Gerard Burke, Director
Remedial Bureau B

DECISION DOCUMENT

33 Franklin
Brooklyn, Kings County
Site No. C224303
June 2021

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=C224303

Brooklyn Public Library-Leonard Branch
81 Devoe Street
Brooklyn, NY 11211
Phone:

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 at 33 Franklin Street in the Greenpoint section of Brooklyn, NY and is currently identified as Block 2589 and Lot 13 on the New York City Tax Map. The site is an irregular shaped lot located on the west side of Franklin Street, south side of Calyer Street and north side of Quay Street for a total of approximately 0.43 acres.

Site Features:
The site was developed with a 1-story warehouse in 1968, which is currently vacant.

Current Zoning and Land Use:
The site is zoned M1-2 (manufacturing) with an R6A (residential) overlay. The site is located within a Special Mixed-Use District (MX) which was established in 1997 to encourage investment in, and enhance the vitality of, existing neighborhoods with mixed residential and industrial uses in close proximity and create expanded opportunities for new mixed-use communities. Surrounding land use includes single family residential, mixed-use commercial/retail/residential and office buildings to the east, industrial/manufacturing facilities to the south and commercial/industrial buildings to the west.

Past Use of the Site:
The site was developed with three, 3-story dwellings with rear yards and one, 2-story stable fronting to the north along Calyer Street from at least 1887, with a carpenter and an iron foundry occupying the rear of the site. By 1905, one of the dwellings was identified as an office and foundry. By 1951, the 2- to 3-story dwelling had been converted to White Metal Foundry, with two additional 1-story foundry structures in the rear yard. By 1965, the majority of the site was undeveloped, with portions of a factory remaining on the southern border along Quay Street. By 1978, the site was redeveloped with the existing 1-story manufacturing/warehouse building with a mezzanine, which covered the entirety of the lot. The Sanborn maps identified the building with a new construction date of 1968. The site was utilized as storage for an art gallery known as Marlborough Gallery from 1984 to April 2020. The site is currently vacant.

Site Geology and Hydrogeology:
Subsurface soils at the site consist of historic fill materials to a depth of approximately four feet below grade followed by native fine to medium sand. According to the USGS topographic map for the area (Brooklyn Quadrangle), the elevation of the property is approximately thirteen feet above mean sea level. The topography within the immediate area slopes gradually to the west.

Groundwater occurs beneath the site at a depth of approximately seven feet below grade under water table conditions. Based on investigations conducted to date, groundwater flow is generally west.

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
benzo(a)pyrene
benzo(b)fluoranthene
chrysene
indeno(1,2,3-CD)pyrene
cadmium
lead
mercury
1,1,1-trichloroethane
trichloroethene (TCE)
tetrachloroethene (PCE)

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), per- and polyfluoroalkyl substances (PFAS), and pesticides. Based upon investigations conducted to date, the primary contaminants of concern include VOCs, SVOCs and metals in soil.

Soil: The following VOCs were detected at concentrations exceeding the applicable unrestricted use soil cleanup objectives (UUSCOs): tetrachloroethene, or PCE, at a concentration of 2.5 parts per million (ppm) compared to the UUSCO of 1.3 ppm; and trichloroethene, or TCE, at a maximum concentration of 0.52 ppm (UUSCO is 0.47 ppm). The following SVOCs exceeded their respective UUSCOs: benzo(a)anthracene at 1.8 ppm (UUSCO is 1 ppm); benzo(a)pyrene at 3.2 ppm (UUSCO is 1 ppm); benzo(b)fluoranthene at 5.1 ppm (UUSCO is 1 ppm); chrysene at 4.8 ppm (UUSCO is 1 ppm); and indeno(1,2,3-cd)pyrene at 2.5 ppm (UUSCO is 0.5 ppm). Several metals were detected at concentrations exceeding the UUSCOs including: arsenic at 19.6 ppm (UUSCO is 13 ppm); barium at 718 ppm (UUSCO is 350 ppm); cadmium at 6.56 ppm (UUSCO is 2.5 ppm); lead at 739 ppm (UUSCO is 63 ppm); and mercury at 15 ppm (UUSCO is 0.18 ppm). PFAS was not detected in any soil samples. All exceedances of UUSCOs are limited to the historic fill layer in the upper 4 feet of the site. Data does not indicate any off-site impacts in soil related to this site.

Groundwater: The SVOCs benzo(a)anthracene (maximum concentration of 0.08 parts per billion, or ppb), benzo(a)pyrene (maximum concentration of 0.08 ppb), chrysene (maximum concentration of 0.09 ppb) and indeno(1,2,3-cd)pyrene (maximum concentration of 0.07 ppb) were detected above their respective ambient water quality standards. Only naturally occurring metals were detected in filtered groundwater samples. Perfluorooctanoic acid (PFOA) was detected at a maximum concentration of 148 parts per trillion (ppt) and perfluorooctanesulfonic acid (PFOS) was detected at a maximum concentration of 28.9 ppt, exceeding the maximum contaminant limit of 10 ppt each. The highest concentrations of PFAS were detected in the most upgradient well. Data does not indicate any off-site impacts in groundwater related to this site.

Soil Vapor: The chlorinated solvents detected include: 1,1,1-trichloroethane at a maximum concentration of 122 micrograms per cubic meter (ug/m3); PCE at a maximum concentration of

60.1 ug/m3; and TCE at a maximum concentration of 13.6 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.*

Since the site is entirely covered by the building people will not come in contact with site-related soil and groundwater contamination unless they dig below the surface. People are not drinking the contaminated groundwater because the area is served by a public water supply that is 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 building on the site is vacant, the inhalation of site-related contaminants due to soil vapor intrusion does not represent a current concern, however the potential exists for the indoor air in future on-site buildings to be impacted by site contaminants via the soil vapor intrusion pathway. 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.

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.

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 Track 1: Unrestricted use remedy.

The selected remedy is referred to as the Soil Excavation and Vapor Intrusion Evaluation 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;
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development; and
- 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

The existing on-site building(s) will be demolished and materials which cannot be beneficially reused on site will be taken off-site for proper disposal in order to implement the remedy.

Excavation and off-site disposal of all on-site soils which exceed unrestricted 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.

Soil removal and disposal is estimated to extend from surface grade to about 4 feet below sidewalk grade across the site footprint, with additional excavation as needed to meet Unrestricted Use SCOs.

Approximately 3,707 cubic yards of contaminated soil will be removed from the site.

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

3. Vapor Intrusion Evaluation

As 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.

Local Institutional Controls

If no Environmental Easement (EE) or Site Management Plan (SMP) is needed to achieve soil or soil vapor remedial action objectives, then the following local use restriction will be relied upon to prevent ingestion of groundwater: Article 141 of the New York City Department of Health and Mental Hygiene code which prohibits potable use of groundwater without prior approval.

Contingent Track 1

The intent of the remedy is to achieve Track 1 unrestricted use; therefore, no environmental easement or site management plan is anticipated.

In the event that Track 1 unrestricted use is not achieved, or if the vapor intrusion evaluation is not completed prior to completion of the Final Engineering Report, the following contingent remedial elements will be required, and the remedy will achieve a minimum Track 4 Restricted-residential use cleanup.

4. Cover System

A site cover will be required to allow for restricted residential use of the site in areas where the upper two feet of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where a soil cover is to be used it will be a minimum of two feet of soil placed over a demarcation layer, with the upper six inches of soil of sufficient quality to maintain a vegetative layer. Soil cover material, including any fill material brought to the site, will meet the SCOs for cover material for the use of the site as set forth in 6 NYCRR Part 375-6.7(d). Substitution of other materials and components may be allowed where such components already exist or are a component of the tangible property to be placed as part of site redevelopment. Such components may include, but are not necessarily limited to: pavement, concrete, paved surface parking areas, sidewalks, building foundations and building slabs.

If the excavation achieves restricted residential SCO to a depth of at least 15 feet and all source material is removed, a Track 2 restricted residential cleanup will be achieved, and a Cover System will not be a required element of the remedy.

5. Institutional Control

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 controls in accordance with Part 375-1.8 (h)(3);
- allows the use and development of the controlled property for restricted-residential, commercial and industrial uses 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 County DOH; and
- requires compliance with the Department approved Site Management Plan.

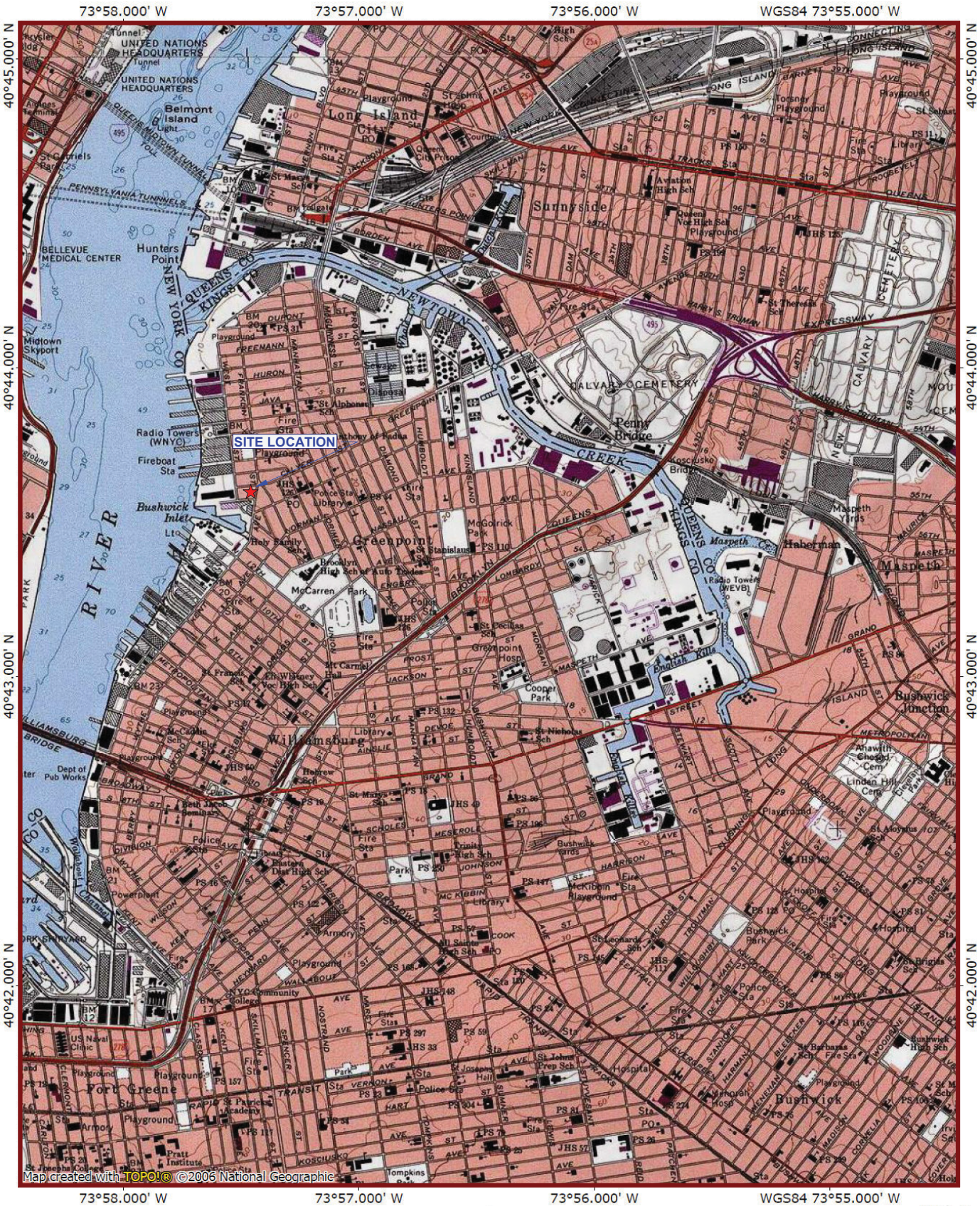
6. Site Management Plan

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 5 above.
   - Engineering Controls: The Cover System discussed in Paragraph 4 above.

   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;
   - a provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in Paragraph 4 above will be placed in any areas where the upper two feet of exposed surface soil exceed the applicable soil cleanup objectives (SCOs);
   - 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) a Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:
   - monitoring of soil vapor to assess the performance and effectiveness of the remedy;
   - monitoring for vapor intrusion for any buildings on the site, as may be required by the Institutional and Engineering Control Plan discussed above.



NATIONAL GEOGRAPHIC

	Figure No. **1**	Site Name: REDEVELOPMENT PROJECT
		Site Address: 33 FRANKLIN STREET, BROOKLYN, NY
		Drawing Title: SITE LOCATION MAP

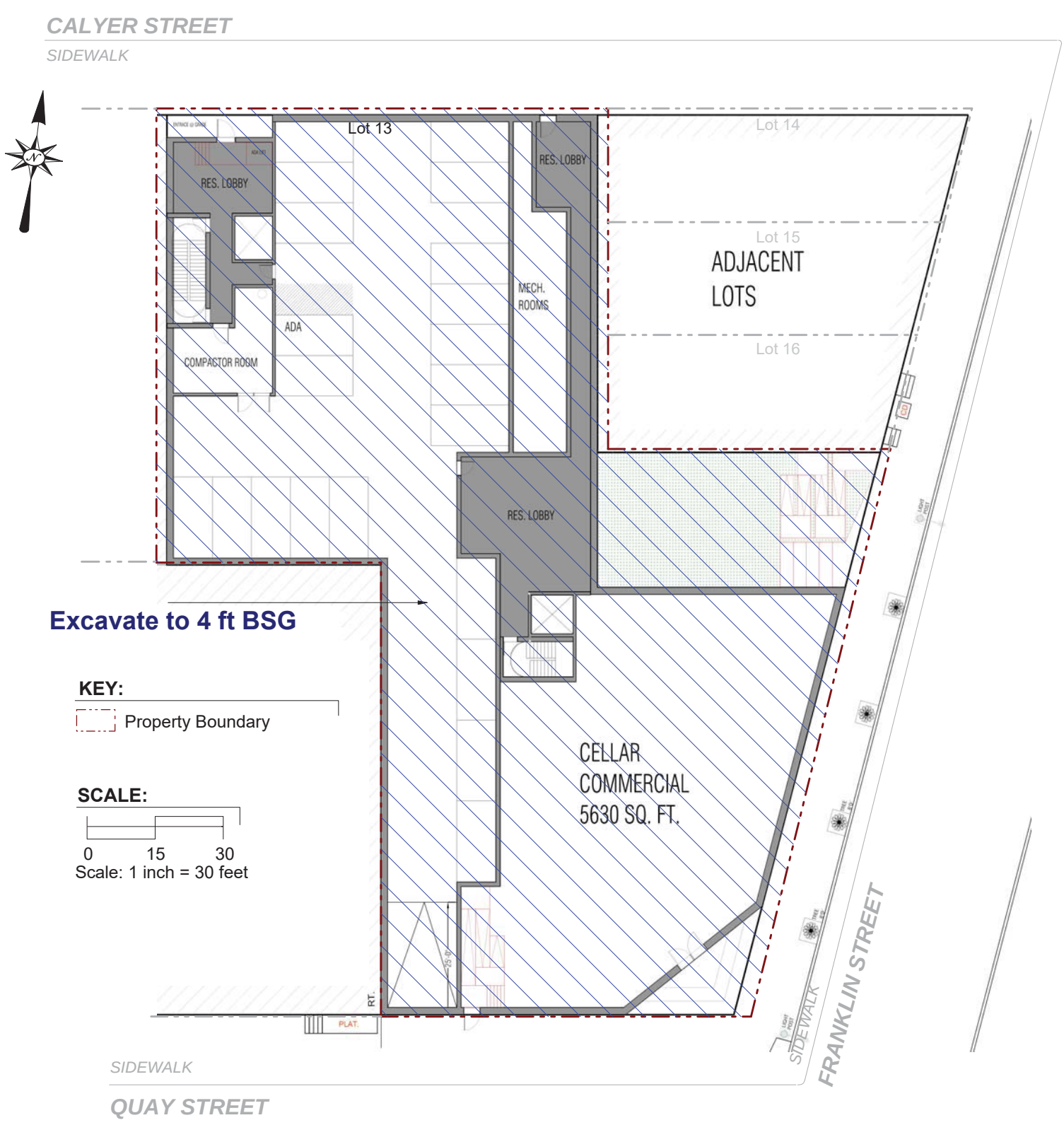


Figure **2**	Site Name:	REDEVELOPMENT PROJECT
	Site Address:	33 FRANKLIN STREET, BROOKLYN, NY
	Drawing Title:	EXCAVATION PLAN