DECISION DOCUMENT

Former Packaged Lighting Systems, Inc.
Brownfield Cleanup Program
Walden, Orange County
Site No. C336079
December 2016

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

DECLARATION STATEMENT - DECISION DOCUMENT

Former Packaged Lighting Systems, Inc.
Brownfield Cleanup Program
Walden, Orange County
Site No. C336079
December 2016

Statement of Purpose and Basis

This document presents the remedy for the Former Packaged Lighting Systems, Inc. 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 Former Packaged Lighting Systems, Inc. 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.

2. 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). The site cover may consist of paved parking areas, sidewalks or a soil cover. Where the soil cover is required 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 as set forth in 6 NYCRR Part 375-6.7(d). In areas where building foundations or building slabs preclude contact with the soil, the requirements for a site cover will be deferred until such time that they are removed.

3. Vapor Mitigation

Any occupied on-site buildings will be required to have a sub-slab depressurization system, or a similar engineered system, to mitigate the migration of vapors into the building from soil and/or groundwater.

4. Institutional Control

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

• require 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);

• allow 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;

• restrict 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

• require compliance with the Department approved Site Management Plan

5. 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 4 above.

Engineering Controls: The soil cover discussed in Paragraph 2 and the sub-slab depressurization system discussed in Paragraph 3 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;

• a provision for removal or treatment of the source area located under the main building if and when the building is demolished;

• descriptions of the provisions of the environmental easement including any land use, and/or groundwater use restrictions;

• 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 groundwater, sub-slab vapor and indoor air to assess the performance and effectiveness of the remedy;

• a provision for additional groundwater treatment if determined necessary by the Department; and

• a schedule of monitoring and frequency of submittals to the Department.

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.

December 6, 2016
Date

George Heitzman, Director
Remedial Bureau C

DECISION DOCUMENT

Former Packaged Lighting Systems, Inc.
Walden, Orange County
Site No. C336079
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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:

Josephine Louise Public Library
5 Scofield Street
Walden, NY 12586
Phone: 845-778-7621

NYSDEC Region 3 Headquarters
Attn: Sarah Shepard
21 South Putt Corners Rd
New Paltz, NY 12561
Phone: (845) 256-3154

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, Voluntary 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: This former commercial/industrial site is located at 29 Grant Street, in the Village of Walden, Orange County. The site encompasses roughly 1.5 acres, bounded to the north by Grant Street, to the west by an active railroad line, to the east by two residences along Elm Street, and to the south by an open field. The site and surrounding area are served by public water.

Site Features: The site contains three vacant structures including a large three story warehouse, an adjacent two story office building and a two story wooden structure. The site also includes a paved parking area and landscaping (trees, bushes, and grass).

Current Zoning and Land Use: The site is zoned I-1 - Industrial Park. The intended future use is restricted residential.

Past Use of the Site: The site has a history of industrial use dating back to the mid-1800s. From 1885 to 1894 the site was operated by the Rider Engine Company, a manufacturer of steam engines. From 1900 to 1939 the facility operated under the name Rider-Ericsson Engine Company and continued manufacturing steam engines. From the 1920s until 1967 the facility was operated by Spence Engineering, a manufacturer of steam regulators and valve mechanisms. From 1968 until 2008 the facility was used by Packaged Lighting Systems, Inc. which designed unique lighting systems for New York City theaters.

Site Geology and Hydrogeology: Soils on the site consist of 12 to 18 inches of dark organic loam mixed with historic fill, underlain to a depth of 12 feet by dense clayey till and lenses of small gravel. Depth to groundwater varies from 6 to 8 feet deep across the site and flows to the north-northeast. Bedrock in the area of the site is presumed greater than 60 feet below grade.

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 Applicants under the Brownfield Cleanup Agreement are Volunteers. The Applicants do not have an obligation to address off-site contamination. The Department has determined that the site poses a significant threat to public health and the environment due to the potential for off-site impacts.

The Department has sought to identify any parties (other than the Volunteer(s)) known or suspected to be responsible for contamination at or emanating from the site, referred to as Potentially Responsible Parties (PRPs). The Department will bring an enforcement action against the PRPs. If an enforcement action cannot be brought, or does not result in the initiation of a remedial program by any PRPs, the Department will evaluate the off-site contamination for action under the State Superfund. The PRPs are subject to legal actions by the State for recovery of all response costs the State incurs or has incurred.

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
- indoor air
- sub-slab 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:

trichloroethene (TCE)
benzo(a)anthracene
benzo(b)fluoranthene
benzo(a)pyrene
benzo[k]fluoranthene
chrysene
tetrachloroethene (PCE)

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

- groundwater
- soil
-soil vapor intrusion

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.

The following IRM(s) has/have been completed at this site based on conditions observed during the RI.

Underground Tank Removal/Closure and Groundwater Treatment

From 2011 to 2013 interim remedial measures were completed at the site including tank closures, a cistern cleaning and treatment of groundwater using in-situ chemical oxidation.

Two underground storage tanks, 550 gallons and 10,000 gallons, were closed in 2011. The 550 gallon tank was cleaned out and removed. The tank excavation was backfilled with soil that meets the SCO for restricted residential use. The 10,000 gallon tank was closed in place. All fluid was removed from the tank and it was filled with inert material.

During the investigation a cistern was discovered and sampled. The sampling indicated that the water in the cistern was contaminated with TCE. 86 gallons of liquid and sludge were pumped from the cistern and disposed of off-site.

In-situ chemical oxidation was implemented in July 2013, using injections of iron-activated persulfate, to treat groundwater at two hot spots. 2,090 pounds of material was injected at 24 locations in the two areas. Groundwater has been monitored both on-site and off-site to assess the effectiveness of the IRM. Contaminant concentrations have dropped significantly as a result of the IRM treatment, but have not yet reached ambient groundwater quality standards.

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.

Nature and Extent of Contamination: Soil and groundwater samples were collected and analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), pesticides and metals. Based upon investigations conducted to date, the primary contaminants of concern are the chlorinated VOCs tetrachloroethene (PCE), trichloroethene (TCE), and various SVOCs. Some PCBs and metals were also detected in soil but were generally below restricted residential SCOs.

Groundwater – TCE and PCE were the primary contaminants detected in on-site groundwater. Cis-1,2-dichloroethene was also detected but at much lower concentrations. The depth to groundwater ranges from approximately 6 to 8 feet below grade across the site. The maximum detected concentrations of TCE and PCE in on-site groundwater in the most recent sampling event were 100 parts per billion (ppb) and 19.6 ppb, respectively. Although these levels are considerably lower than levels measured before the groundwater IRM was performed, they remain above ambient groundwater quality standards.

TCE and PCE have also been detected in off-site groundwater at concentrations of approximately 150 ppb and 16.4 ppb, respectively.

Soil – TCE was detected above the soil cleanup objective (SCO) for the protection of groundwater in three soil samples, with a maximum concentration of 46 parts per million (ppm) detected in a sample collected at a depth of ten feet. A definitive source of TCE has not been identified but is likely located beneath the main building. It is not expected that any soil contamination extends off-site.

Semi-volatile organic compounds (SVOCs) have been detected above the SCOs for restricted residential use in surface soil (0-2 inches). SVOCs including benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene and chrysene have been detected in shallow soil across the site at levels up to 130 ppm, 130 ppm, 160 ppm, 65 ppm and 140 ppm, respectively.

Sub-slab Soil Vapor/Indoor Air - TCE was detected in several sub-slab soil vapor and indoor air samples at levels where mitigation is recommended. The highest levels of TCE were detected in the basement where sub-slab vapor and indoor air concentrations were 2,200 and 11.3 micrograms per cubic meter (ug/m^3), respectively.

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.*

Access to the site is unrestricted. Persons who enter the site could contact contaminants by walking on the soil, digging or otherwise disturbing the soil. Contact with contaminated groundwater is unlikely unless they dig below the ground surface. 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 the groundwater may move into the soil vapor (air spaces within the soil), which in turn may move into overlying 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. The potential for soil vapor intrusion to impact off-site buildings will be evaluated.

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

- Restore ground water aquifer to pre-disposal/pre-release conditions, to the extent practicable.
- 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.
- Prevent impacts to biota from ingestion/direct contact with soil causing toxicity or impacts from bioaccumulation through the terrestrial food chain.

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 4: Restricted use with site-specific soil cleanup objectives remedy.

The selected remedy is referred to as the Soil Cover and Sub-slab Mitigation 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.

2. 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). The site cover may consist of paved parking areas, sidewalks or a soil cover. Where the soil cover is required 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 as set forth in 6 NYCRR Part 375-6.7(d). In areas where building foundations or building slabs preclude contact with the soil, the requirements for a site cover will be deferred until such time that they are removed.

3. Vapor Mitigation

Any occupied on-site buildings will be required to have a sub-slab depressurization system, or a similar engineered system, to mitigate the migration of vapors into the building from soil and/or groundwater.

4. Institutional Control

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

• require 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);

• allow 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;

• restrict 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

• require compliance with the Department approved Site Management Plan

5. 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 4 above.

Engineering Controls: The soil cover discussed in Paragraph 2 and the sub-slab depressurization system discussed in Paragraph 3 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;

• a provision for removal or treatment of the source area located under the main building if and when the building is demolished;

• a provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in Paragraph 3 above will be placed in any areas where the upper one foot of exposed surface soil exceed the applicable soil cleanup objectives (SCOs);

• descriptions of the provisions of the environmental easement including any land use, and/or groundwater use restrictions;

• 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 groundwater, sub-slab vapor and indoor air to assess the performance and effectiveness of the remedy;

• a provision for additional groundwater treatment if determined necessary by the Department; and

• a schedule of monitoring and frequency of submittals to the Department.

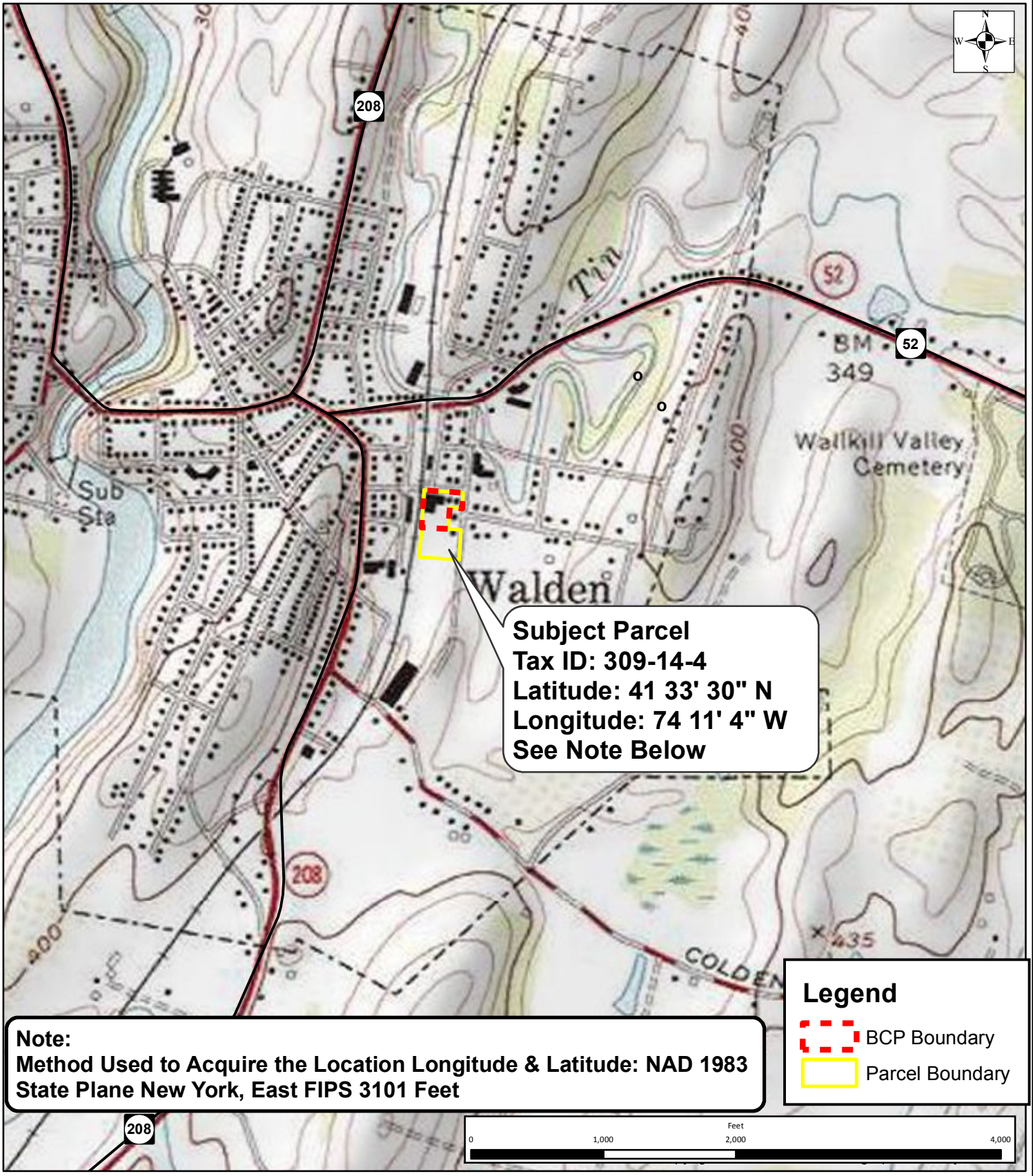

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Figure 1 - Site Location Map

29 Grant Street
Village of Walden, Orange County, New York

Source: U.S.G.S. Topographic Map Dated 1978, Photo Revised 1980: USGS Ref. Code: Walden - 41074-E2-TF-024; Village of Walden 2007 Tax Parcel Data; State of New York DOT 2008 Roads dataset.

Drawn:	SCP/STF
Date:	July 2013/Feb. 2015
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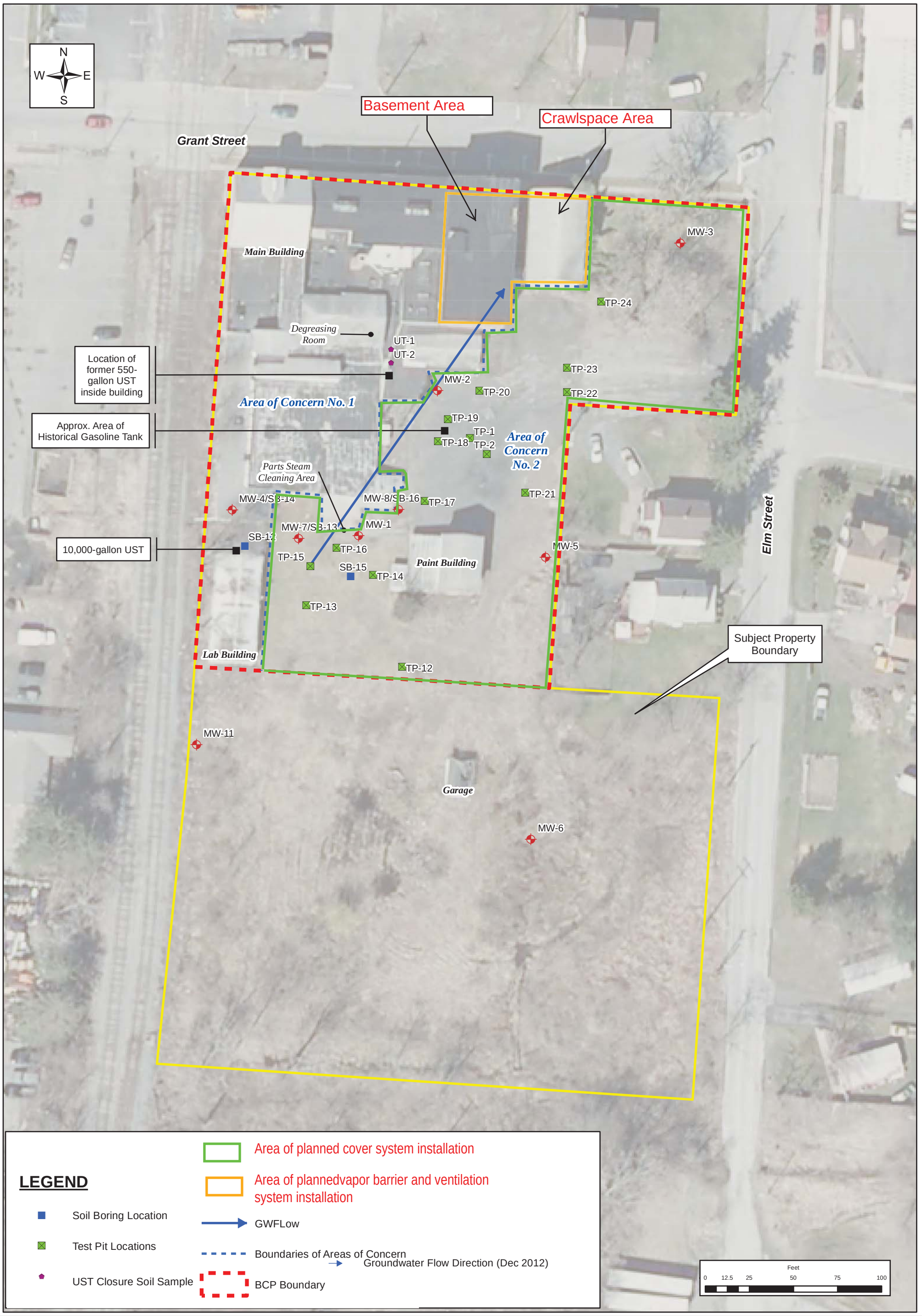

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Former Packaged Lighting Systems, Inc. Site

Figure 3 - Alternative 2 Engineering Control Areas

29 Grant Street
Town of Walden, Orange County, New York

Source: NYS Department of Homeland Security and Emergency Services 2010 Orthoimagery; Existing Sample Locations and Site Features from Going Phase II, 2010;Proposed Features Drawn by Chazen, 2011-2013.

Drawn:	RL/STF
Date:	May 2016
Scale:	1 inch equals 50 feet
Project:	41115.00
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