

July 21, 2021

Parag Amin, P.E.  
Project Manager, Division of Environmental Remediation  
New York State Department of Environmental Conservation  
625 Broadway, Albany, New York 12233

**Re: WALGREEN COMPANY STORE 02077  
10 East Chester Street  
Kingston, New York  
BCP Site No. C356032  
Revised Periodic Review Report and  
Institutional and Engineering Control Certification**

Dear Mr. Amin:

AECOM Technical Services, Inc. (AECOM), on behalf of the Walgreen Company (Walgreens), is submitting this Revised Periodic Review Report (PRR) and Institutional and Engineering Control Certification (IC/EC Certification) to the New York State Department of Environmental Conservation (NYSDEC) for BCP Site C356032 at 10 East Chester Street in Kingston, New York.

## **Introduction**

Walgreens has been working together with the NYSDEC for over ten years to monitor groundwater conditions at the site. In 2013, the NYSDEC rejected the IC/EC Certification for the site and required that a *Corrective Measures Workplan (CMWP)* be submitted to address contaminated groundwater that may be migrating from the site. Walgreens conducted additional soil and groundwater investigation activities at the site to obtain data for a *CMWP* in 2014, 2016, and 2018. A *CMWP* was submitted in February 2019, but was not approved by the NYSDEC. Walgreens and NYSDEC have remained in communication since the submittal of the initial *CMWP* in 2019. Groundwater sampling was conducted by Walgreens in March 2020 and the results were submitted to the NYSDEC in the *Groundwater Analytical Results Summary Report March 2020* on August 12, 2020. In addition, off-site investigation work was completed by the NYSDEC and both on-site and off-site groundwater sampling were conducted by the NYSDEC in 2020.

A teleconference was held on April 1, 2021 between the NYSDEC, Walgreens, and AECOM to discuss proposed revisions to the *CMWP*. The objective was to agree upon a path forward considering both the March 2020 data collected by Walgreens and the data obtained through the NYSDEC investigative work completed in 2020. During the call, the PRR and IC/EC Certification were discussed. The NYSDEC concurred that since a revised *CMWP* was being prepared, the submittal of the PRR and IC/EC Certification would be focused for this reporting period and understands that only certain items can be certified. AECOM has followed the general approach outlined in Enclosure 3 of the Reminder Notice.

## **Site Overview**

The subject property (site) is located at 10 East Chester Street in Kingston, New York (see **Figure 1**). The site consists of approximately 1.0 acre of land and is currently Walgreens Store No. 02077. The

construction of the store was completed in 2010. The site is commercially zoned with surrounding properties that include a mix of commercial businesses and residential lots.

#### Brownfield Cleanup Program

The previous owner of the site, 10 East Chester Street LLC, entered into the New York State Brownfield Program (BCP Site Number C356032) and completed remediation in accordance with the requirements of the BCP. Based on the results of the *Brownfield Cleanup Program Remedial Investigation Report/Remedial Action Plan* prepared by S&W Redevelopment of North America, LLC (S&W), dated August 2005, the constituents of potential concern at the site include volatile organic compounds (VOCs) associated with solvents (i.e., trichloroethene [TCE] and tetrachloroethene [PCE]) and petroleum products.

The site remedial activities included the removal of seven underground storage tanks (USTs) that contained petroleum products, the excavation of impacted soil, and performing in-situ chemical oxidation using potassium permanganate to remediate the groundwater. The remedial activities were conducted in accordance with the NYSDEC approved *Remedial Action Plan* prepared by S&W, dated August 2005 and the *Remedial Design In-Situ Chemical Oxidation* prepared by Sterns and Wheeler, LLC, dated October 2005.

S&W submitted a *Final Engineering Report* to the NYSDEC in November 2006. A Certificate of Completion was issued by the NYSDEC on December 14, 2006. This certificate stated "...that the remediation requirements set forth in ECL Article 27, Title 14, have been or will be achieved in accordance with the time frames, if any, established in the remedial work plan." The certificate also noted that the site is restricted to a "commercial" use and that the site remediation is also predicated on the use of institutional or engineering controls. The use of groundwater underlying the site is prohibited without prior approval from the NYSDEC.

#### Site Management Plan and Annual Groundwater Monitoring

A *Site Management Plan (SMP)* was prepared by S&W, on behalf of 10 East Chester Street LLC in December 2006. The *SMP* provides a detailed description of procedures required to manage remaining contamination at the site after completion of the Remedial Action. The *SMP* requires that all buildings constructed on-site have a NYSDEC and New York State Department of Health (NYSDOH) approved sub-slab depressurization system, maintenance of six-inches of concrete or asphalt pavement across the site, and annual groundwater monitoring. Any future excavation of soils at the site must be done in accordance with the *SMP*. The *SMP* also requires an annual certification that the engineering and institutional controls employed at the site are unchanged from the previous certification and that nothing has occurred that would impair the ability of such controls to protect the public health and environment.

During redevelopment activities in May and June 2008, monitoring wells MW-1S, MW-2S, and MW-3S were abandoned with approval from the NYSDEC. Replacement monitoring wells MW-1, MW-2 and MW-3 were installed by Bureau Veritas in February 2010. The locations of these wells are shown in **Figure 2**. Groundwater samples were collected from these three wells in March and May 2010. The monitoring well installation and groundwater sampling results for 2010 are summarized in the *Annual Groundwater Sampling Report* prepared by Bureau Veritas, dated September 29, 2010.

URS Corporation (URS became part of AECOM in 2014) submitted *Annual Groundwater Sampling, Site Management Plan Review, and Institutional Control and Engineering Control (IC/EC) Certifications* to the NYSDEC in April 2011 and April 2012. The NYSDEC accepted the PRR and IC/EC Certifications for February 1, 2011 to March 31, 2011 and March 31, 2011 to October 26, 2012. URS submitted a *Periodic Review Report (PRR): Annual Groundwater Sampling, Site Management Plan Review, and IC/EC Certification* to the NYSDEC in December 2013. The NYSDEC did not approve the PRR dated December 2013 and IC/EC Certification for reporting period October 26, 2012 to October 26, 2013 and requested that a CMWP be submitted to address recalcitrant levels of PCE in MW-3.

URS (AECOM) continued to submit PRR and IC/EC Certification to the NYSDEC. The January 2015 submittal covered the reporting period of October 26, 2012 to November 30, 2014 and included an updated Qualitative Human Health Risk Assessment. The NYSDEC did not provide an approval of this certification. The March 2016 submittal reviewed compliance with the SMP and summarized 2015 groundwater sampling, but did not include an IC/EC Certification. The May 2018 submittal covered the reporting period of October 26, 2012 to March 30, 2018. In a letter dated November 8, 2018, NYSDEC indicated the report and certification were acceptable, except for Items 8 and 9 of Box 2A. The NYSDEC indicated that a CMWP must be submitted to address the potential off-site migration of impacted groundwater.

#### Additional Soil and Groundwater Investigations

Walgreens has been working with the NYSDEC since 2013 to develop a remedial approach for the site and to determine if there is an on-site source or an upgradient source of PCE. Additional soil and groundwater investigations have been conducted both on the Walgreens property and off-site to obtain information pertinent to a remedial design. The results of the investigations have been provided to the NYSDEC under separate cover. A brief description of the investigation activities is provided below.

- URS conducted a review of previous investigative work conducted at the site and identified data gaps. URS performed an investigation in July 2014 to delineate shallow soil impacts above the water table along the former sewer line that connected the floor drains within the former dry cleaning facility to the sanitary sewer located in Broadway, in the area of the former 550-gallon waste oil UST, and along the western property boundary (along East Chester Street). The 2014 investigation concluded that there is not an on-going source of PCE in the shallow soil at the site that is contributing to the groundwater concentrations in the areas investigated. The highest concentrations of PCE in the groundwater were detected along the East Chester Street property boundary. PCE concentrations in the groundwater were shown to decrease southeast across the site in the direction of historical groundwater flow.
- AECOM submitted a *Workplan* to further delineate soil and groundwater impacts and collect data for potential remedial design in June 2015 and a *Workplan Addendum* in April 2016. The scope of work included a task to evaluate if there is an upgradient source of PCE as the 1950 and 1957 Sanborn maps showed a historical dry cleaning operation approximately 300 feet west (upgradient) of the Walgreens site (see **Figure 2**). Two monitoring wells (MW-4 and MW-5) were installed on the Walgreens property. The 2016 investigation concluded that the concentrations of PCE detected in the on-site soil are not

indicative of source material on the Walgreens property and that the low levels of PCE detected in the on-site soil are likely due to the equilibrium partitioning of PCE in groundwater to the soil matrix rather than the partitioning of PCE from soil to groundwater. The off-site investigation conducted at 322 Broadway confirmed that PCE is present in the groundwater upgradient of the Walgreens site.

- At the request of the NYSDEC, Walgreens installed monitoring well MW-6 at 322 Broadway in 2018. Groundwater samples were collected from all wells (MW-1 through MW-6) in March 2018. PCE was detected in the groundwater samples collected from MW-3, MW-4, and MW-6 at concentrations that exceed the NYSDEC GW standard of 5 micrograms per liter (µg/L). PCE was not detected in the groundwater samples collected from MW-1, MW-2, or MW-5.

#### Corrective Measures Workplan

A *CMWP* was submitted to the NYSDEC in February 2019 with the objective to reduce the concentrations of chlorinated VOCs, specifically PCE, in the groundwater leaving the southeastern property boundary. An in-situ remedial approach was chosen as the corrective measure for the site and included amendments being added to the subsurface in the saturated zone. The NYSDEC provided comments to the *CMWP* and Walgreens has been working with the NYSDEC to submit an acceptable *CMWP*. Walgreens collected an additional round of groundwater samples in March 2020 to refine the *CMWP*. A *Revised CMWP* focusing on boundary treatment was submitted on May 4, 2021 and has been approved by the NYSDEC. AECOM, on behalf of Walgreens, is currently conducting a records review to evaluate if there are area(s) upgradient of the property boundary that might be appropriate for targeted treatment.

#### **Remedy Performance, Effectiveness, and Protectiveness**

As discussed above, site remedial activities completed by the previous property owner have included the removal of seven USTs that contained petroleum products, the excavation of impacted soil, and performing in-situ chemical oxidation using potassium permanganate to remediate the groundwater. The remedial activities were conducted in accordance with the NYSDEC approved *Remedial Action Plan* prepared by S&W, dated August 2005 and the *Remedial Design In-Situ Chemical Oxidation* prepared by Sterns and Wheeler, LLC, dated October 2005. S&W submitted a *Final Engineering Report* to the NYSDEC in November 2006. A Certificate of Completion was issued by the NYSDEC on December 14, 2006.

Routine groundwater monitoring has been conducted in accordance with the *SMP* at MW-1, MW-2, and MW-3 since 2010. Groundwater samples were collected from MW-5 and MW-6 in March 2018 and March 2020. The historical groundwater data is shown in **Table 1**. As shown, PCE concentrations have been variable in site groundwater. Walgreens is currently revising the *CMWP* for the site to address contaminated groundwater that may be migrating from the site.

The engineering controls (cover system and sub-slab depressurization system) and institutional controls (groundwater use restriction, land-use restriction, site management plan, and soil management plan) are in place and functioning and are discussed below.

**IC/EC Compliance**

The *SMP* requires a periodic certification that the engineering and institutional controls employed at the site remain unchanged from the previous certification and that nothing has occurred that would impair the ability of such controls to protect the public health and environment. The NYSDEC did not approve the IC/EC Certification submitted in December 2013 for the reporting period October 26, 2012 to October 26, 2013 and requested that a *CMWP* be submitted to address recalcitrant levels of PCE in MW-3. Walgreens has been conducting ongoing investigation work on-site and off-site to determine if there is an on-site or off-site source of PCE in the groundwater and to gather additional information for a remedy. The last fully accepted PRR and IC/EC Certification was for the reporting period of March 31, 2011 to October 26, 2012.

The following institutional controls have been identified in the *SMP* for the site: groundwater use restriction; land-use restriction; site management plan; and soil management plan. These controls continue to be applicable and are in-use. Furthermore, the above limits on site use have been memorialized in the Environmental Easement as well as being listed in the *SMP*, which are themselves part of the Institutional Controls. The site is a commercial property and is an operating Walgreens store. The site does not use groundwater for any purpose. There is an approved *SMP* for the site. There have been no soil excavations at the site since the property has been redeveloped as a Walgreens store. The institutional controls employed at the site are unchanged from the previous certification submitted in May 2018 for the reporting period of October 26, 2012 to March 30, 2018.

The following engineering controls have been identified in the *SMP* for the site: cover system and vapor mitigation system. The cover system consists of six-inches of concrete. A site walk was performed in March 2020 and the cover was observed to be in place and in good condition with no evidence of disruptions. There have been no soil excavations at the site since the property has been redeveloped as a Walgreens store. The Walgreens store has an operating passive sub-slab depressurization system. This system was inspected during the March 2020 field work and was operating properly at the time of the inspection. The engineering controls employed at the site are unchanged from the previous certification submitted in May 2018 for the reporting period of October 26, 2012 to March 30, 2018.

The *SMP* requires annual groundwater sampling and evaluation of groundwater trends. The *SMP* indicates that additional remedial action may be required by the NYSDEC if concentrations of the target compounds are increasing or do not show a decreasing trend. Groundwater sampling was conducted in 2013, 2014, 2015, 2018, and 2020 during the reporting period of this PRR. The historical groundwater data is shown in **Table 1**. As shown, PCE concentrations have been variable in site groundwater. Recent groundwater flow maps have shown that site groundwater flows from the northwest to the southeast across the site.

The IC/EC Certification is attached to this letter. The following items were noted while completing the certification and are annotated on the certification.

- Box 2, Item 7: This box was left unchecked. The Institutional Controls are in place and functioning as intended, but a *CMWP* is warranted due to continued elevated concentrations of PCE in groundwater at the site boundary. A *Revised CMWP* was submitted under separate cover on May 4, 2021 and has been approved by the Department.

- Box 2A, Item 8: The prior Qualitative Exposure Assessment (QEA) focused on the Walgreens property as off-site impacts had not been identified at the time it was prepared. The NYSDEC recently conducted off-site investigative activities. Once this data is finalized, it can be evaluated and considered while updating the QEA for the site.
- Box 2A, Item 9: The assumptions in the QEA for on-site conditions are still valid. As indicated in response to Item 8, the QEA will be revised as appropriate and will consider the data obtained during the NYSDEC's recent investigations once the data has been finalized.
- Box 3, Item 6: The SMP requires annual groundwater monitoring. Groundwater sampling has occurred routinely, but not annually. The most recent groundwater sampling event conducted by Walgreens was in March 2020. Groundwater sampling was conducted in 2013, 2014, 2015, 2018, and 2020 during the reporting period of this PRR.

## Conclusions and Recommendations

The engineering controls (cover system and sub-slab depressurization system) and institutional controls (groundwater use restriction, land-use restriction, site management plan, and soil management plan) are in place and functioning. However, at this time, a full certification cannot be made. An annotated partial certification is attached to this letter.

A *Revised CMWP* focusing on boundary treatment was submitted on May 4, 2021 and has been approved by the NYSDEC. A Revised QEA will be prepared and will consider the off-site investigation data, as appropriate, once it is has been finalized and provided to Walgreens by the NYSDEC.

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Walgreens appreciates the continued working relationship with the NYSDEC. If you have any questions or require additional information, please do not hesitate to give me a call at 864-234-2240.

AECOM



Jennifer Gillies, PG  
Project Manager

## Attachments

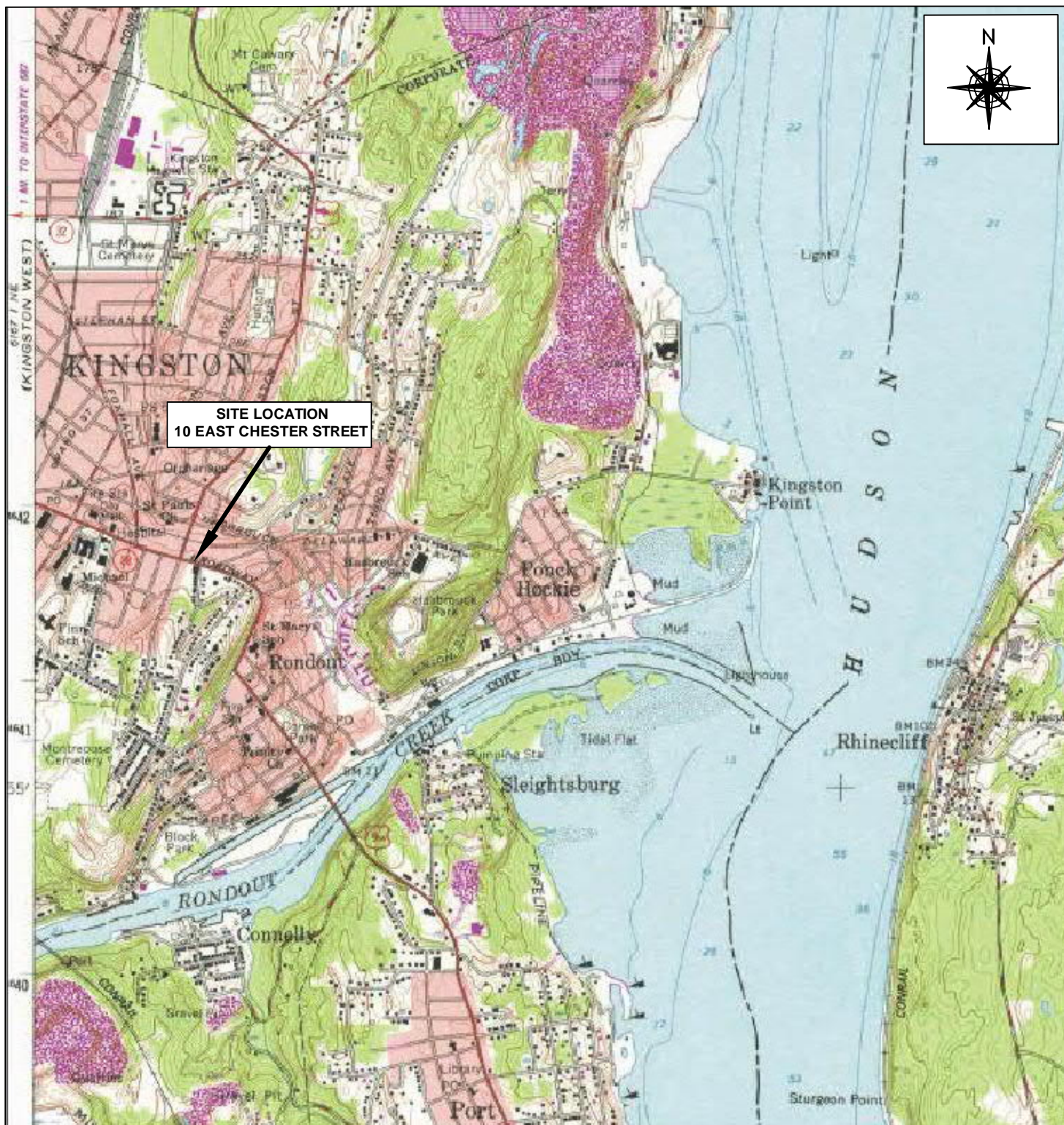
Figure 1      Site Location Map  
Figure 2      Monitoring Well Locations

Table 1      Historical Groundwater Analytical Results

Attachment 1   Institutional and Engineering Controls Certification Form, Revised June 2021

**Figure 1**  
Site Location Map





TARGET QUAD  
NAME: KINGSTON EAST  
MAP YEAR: 1980  
PHOTO REVISED FROM: 1963  
SERIES: 7.5  
SCALE: 1:24000

SITE NAME: 10 EAST CHESTER STREET  
ADDRESS: 10 EAST CHESTER STREET  
KINGSTON, NEW YORK 12401  
LAT/LONG: 41.926/-73.9918

Title: SITE LOCATION MAP  
Location: 10 EAST CHESTER STREET  
KINGSTON, NEW YORK 12401  
Client: WALGREENS STORE #02077

**AECOM**  
AECOM  
40 British American Boulevard  
Latham, New York 12110

Drafter: KP	Date: April 2020
Drg. Size: 8.5 x 11	Job No.: 60562248

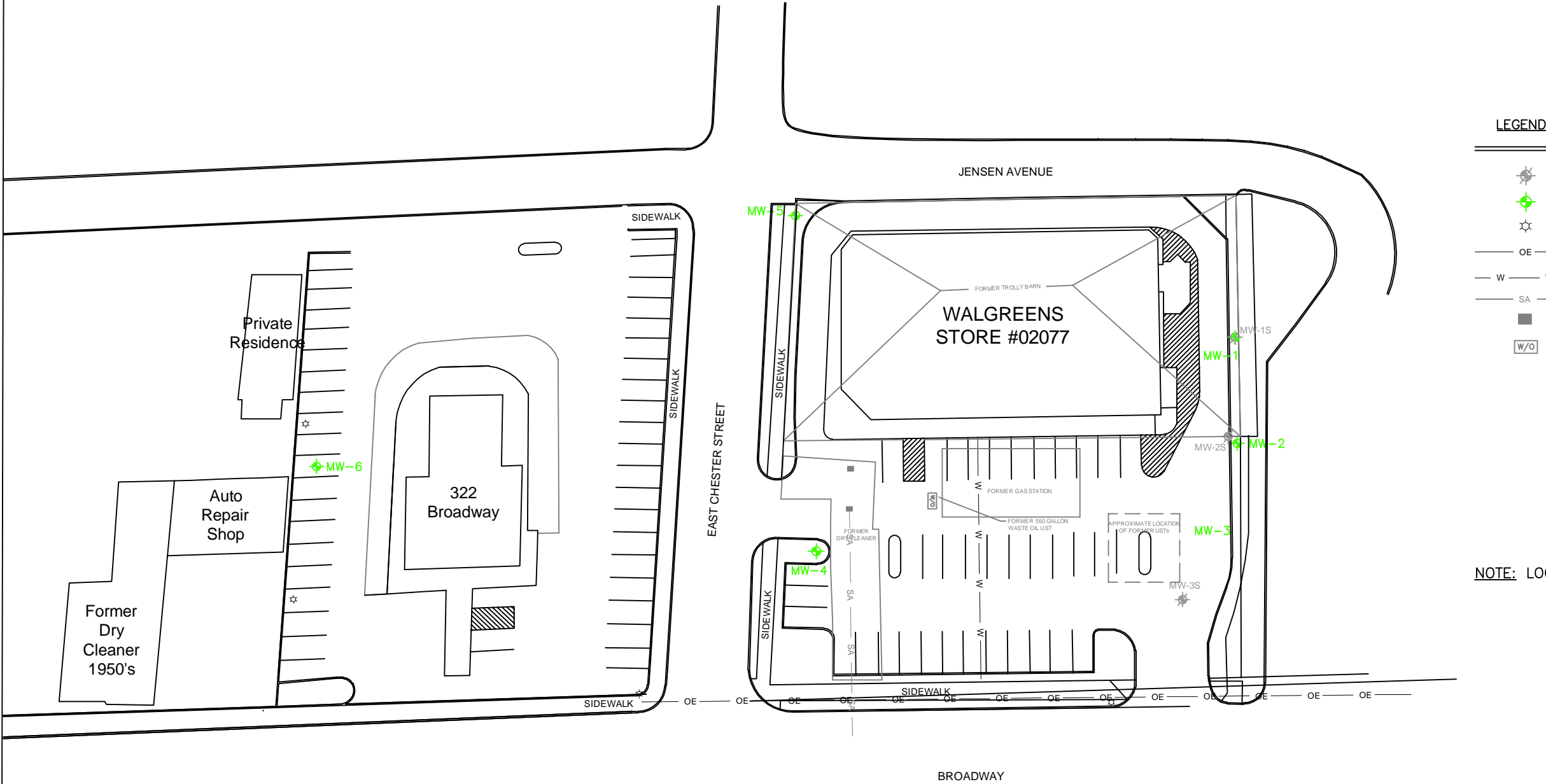
**FIGURE 1**



**Figure 2**  
Monitoring Well Locations



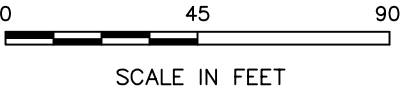
PLOTTED: April 21, 2021 BY: Peppin, Karen CTB USED: 04 Black.dwg PAPER SPACE TAB: FIGURE 2 DWG PATH: C:\Users\karen.peppin\Desktop\4\walgreens\0201 PRR-ContDraft\04\F1-20201 PRR - Title 2\Sampling Locations.dwg



LEGEND:

- CURB
- ABANDONED MONITORING WELL LOCATION
- EXISTING MONITORING WELL LOCATION
- STREET LIGHT
- OVERHEAD ELECTRIC
- WATER LINE
- FORMER SEWER LINE
- FORMER FLOOR DRAIN
- FORMER 550 GALLON WASTE OIL UST

NOTE: LOCATIONS OF KNOWN UTILITIES ARE APPROXIMATE



Title: MONITORING WELL LOCATIONS		
Location: 10 EAST CHESTER STREET KINGSTON, NEW YORK 12401		
Client: WALGREENS STORE 02077		
<b>AECOM</b> AECOM 40 British American Boulevard Latham, New York 12110	Drafter: KP	Date: April 2020
	Drg. Size: 11 x 17	Job No.: 60562248
	<b>FIGURE 2</b>	

**Table 1**  
Historical Groundwater Data

**TABLE 1  
HISTORICAL GROUNDWATER ANALYTICAL RESULTS**

WALGREENS STORE 02077  
BCP SITE NUMBER C356032  
KINGSTON, NEW YORK

Well				Volatile Organic Compound Concentration (µg/L)*								Sample Turbidity (NTU)
	Sample Date	Depth to Water (feet bgs)	Benzene	Ethylbenzene	Isopropylbenzene	Toluene	Total Xylenes	1,2-Dichloroethane	cis-1,2-Dichloroethene	Tetrachloroethene	Trichloroethene	
MW-1	3/13/2010 <sup>A</sup>	NA	ND	ND	ND	ND	53.5	3.6	0.79	ND	ND	4.9**
	5/4/2010 <sup>A</sup>	NA	1.7	130	20	1.7	126.4	3.0	ND	ND	ND	374**
	3/9/2011 <sup>B</sup>	8.14	0.59	43	8.4	0.64	18.4	ND	ND	ND	ND	206
	2/16/2012 <sup>B</sup>	9.74	0.23	10.5	12.2	ND	ND	ND	ND	ND	ND	>800
	8/8/2012 <sup>C</sup>	9.26	ND	9.0	13	ND	2.8	ND	ND	ND	ND	8
	11/8/2013 <sup>C</sup>	9.77	ND	1.1	4.7	ND	ND	0.48	ND	ND	ND	4.56
	10/13/2014 <sup>C</sup>	9.66	1.5	18	2.6	13	62	0.65	2.9	ND	ND	11.7
	11/4/2015 <sup>C</sup>	9.25	ND	ND	ND	ND	ND	ND	ND	ND	ND	21.7
	3/5/2018 <sup>C</sup>	8.18	ND	ND	ND	ND	ND	ND	ND	ND	ND	8.37
3/12/2020 <sup>C</sup>	9.57	ND	ND	ND	ND	ND	ND	ND	ND	ND	88	
MW-2	3/13/2010 <sup>A</sup>	NA	ND	0.97	86	ND	63.5	ND	3.5	5.3	16	2.93**
	5/4/2010 <sup>A</sup>	NA	ND	1.1	45	ND	29.5	ND	2.8	10	17	10**
	3/9/2011 <sup>B</sup>	8.18	ND	4	19	ND	11.6	ND	6.4	0.6	14	800
	2/16/2012 <sup>B</sup>	9.64	0.28	10.3	27.6	ND	38.5	ND	3.6	0.34	1.0	>800
	8/8/2012 <sup>C</sup>	9.17	ND	1.9	6.1	ND	5.5	ND	3.1	ND	0.47	1.1
	11/8/2013 <sup>C</sup>	9.63	0.43	5.3	16	ND	11	ND	5.2	ND	ND	0.46
	10/13/2014 <sup>C</sup>	9.63	ND	4.1	16	ND	5.6	0.29	4.2	ND	ND	0.0
	11/4/2015 <sup>C</sup>	9.27	ND	2.0	24	ND	3.6	0.27	4.0	ND	ND	0.0
	3/5/2018 <sup>C</sup>	8.30	ND	ND	ND	ND	ND	ND	ND	ND	ND	19.7
3/12/2020 <sup>C</sup>	9.51	ND	ND	27	ND	1.6 J	ND	ND	ND	ND	2.43	
MW-3	3/13/2010 <sup>A</sup>	NA	ND	ND	ND	ND	ND	ND	1	1,000	7.7	7.41**
	5/4/2010 <sup>A</sup>	NA	ND	ND	ND	ND	ND	ND	ND	2,200	5	10**
	3/9/2011 <sup>B</sup>	8.37	ND	ND	ND	ND	ND	ND	1.5	840	11	>800
	2/16/2012 <sup>B</sup>	9.56	ND	ND	ND	ND	ND	ND	2.6	1,040	11.2	>800
	8/8/2012 <sup>C</sup>	9.11	ND	ND	ND	ND	ND	ND	ND	200	9.5	1.0
	11/8/2013 <sup>C</sup>	9.50	ND	ND	ND	ND	ND	ND	3.0	2,000	7.0	0.3
	10/13/2014 <sup>C</sup>	9.58	ND	ND	ND	ND	ND	ND	ND	1,200	ND	0.1
	11/4/2015 <sup>C</sup>	9.25	ND	ND	ND	ND	ND	ND	20	1,800	39	0.0
	3/5/2018 <sup>C</sup>	8.48	ND	ND	ND	ND	ND	ND	37	110	19	5.18
3/12/2020 <sup>C</sup>	9.42	ND	ND	ND	ND	ND	ND	45	120	8.5	1.51	
MW-4	3/5/2018 <sup>C</sup>	7.53	ND	ND	ND	ND	ND	ND	ND	630	ND	106.3
	3/12/2020 <sup>C</sup>	8.11	ND	ND	ND	ND	ND	ND	ND	4,000	12	32.1
MW-5	3/5/2018 <sup>C</sup>	7.30	ND	ND	ND	ND	ND	ND	ND	ND	ND	130.7
	3/12/2020 <sup>C</sup>	7.87	ND	ND	ND	ND	ND	ND	ND	ND	ND	6.99

**Notes:**

\*The maximum of the reported values (i.e., normal sample, duplicates, and dilutions) is listed.

\*\*Turbidity value recorded during submersible pump purging; the sample was subsequently collected with a bailer.

ND = Not Detected

NA: Not Available

A: At least three well volumes purged with a submersible pump, sample collected with a bailer.

B: Three well volumes purged with a bailer and sample collected with a bailer.

C: Low-flow purging and sampling.

MW-4 and MW-5 were sampled for the first time in March 2018, so there is limited historical data for comparison.



**Attachment 1**

Institutional and Engineering Controls Certification Form



Enclosure 2  
**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**  
**Site Management Periodic Review Report Notice**  
**Institutional and Engineering Controls Certification Form**



Site Details		Box 1	
Site No.	C356032		
Site Name <u>10 East Chester Street</u>			
Site Address: 306-318 Broadway		Zip Code: 12401	
City/Town: Kingston			
County: Ulster			
Site Acreage: 0.866			
Reporting Period: October 26, 2012 to April 01, 2021			
		YES	NO
1. Is the information above correct?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
If NO, include handwritten above or on a separate sheet.			
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.			
5. Is the site currently undergoing development?		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Box 2	
	YES      NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial	<input checked="" type="checkbox"/> <input type="checkbox"/>
7. Are all ICs in place and functioning as designed?	<input type="checkbox"/> <input type="checkbox"/>
The ICs are in place and functioning as intended, but a CMWP is warranted due to continued elevated concentrations of PCE in groundwater at the site boundary. A Revised CMWP was submitted under separate cover on May 4, 2021 and has been approved by the Department.	
<b>IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.</b>	
<b>A Corrective Measures Work Plan must be submitted along with this form to address these issues.</b>	
_____ Signature of Owner, Remedial Party or Designated Representative	_____ Date

The prior QEA focused on the Walgreens property as off-site impacts had not been identified at the time it was prepared. The NYSDEC recently conducted off-site investigative activities. Once this data is finalized, it can be evaluated and considered while updating the QEA. The assumptions in the QEA for on-site conditions are still valid.

Box 2A

8. Has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid? YES ☒ NO ☐

If you answered YES to question 8, include documentation or evidence that documentation has been previously submitted with this certification form.

9. Are the assumptions in the Qualitative Exposure Assessment still valid? YES ☒ NO ☐  
(The Qualitative Exposure Assessment must be certified every five years)

If you answered NO to question 9, the Periodic Review Report must include an updated Qualitative Exposure Assessment based on the new assumptions.

SITE NO. C356032

Box 3

### Description of Institutional Controls

Parcel	Owner	Institutional Control
56.26-11-43.1	Jeff Groncki, Walgreens Co.	Ground Water Use Restriction
		Soil Management Plan
		Landuse Restriction
		Monitoring Plan
		Site Management Plan

The Controlled Property may be used for restricted commercial or industrial use as long as the following long-term engineering controls are employed:

1. A barrier layer must be maintained on the Controlled Property of either one foot of clean fill or an alternative barrier layer approved by the NYSDEC, such as concrete, asphalt, or structure;
2. Any proposed soil excavation on the Controlled Property below the barrier layer requires prior notification and approval by NYSDEC in accordance with the Site Management Plan. The excavated soil must be managed, characterized, and properly disposed of in accordance with NYSDEC regulations and directives;
3. Any area of soil excavation below the barrier layer that is to be returned to vegetated soil (i.e.: not concrete, asphalt or structures) must be backfilled with a minimum one (1) foot layer of clean fill underlain by a demarcation layer;
4. Any future structures shall be constructed with a sub-slab depressurization system approved by the NYSDEC; and
5. The use of groundwater underlying the Controlled Property is prohibited without prior approval from NYSDEC for treatment rendering it safe for use for drinking or industrial purposes.

6. Perform annual groundwater sampling to assess the trend and need for the additional remedial action.

Groundwater sampling has occurred routinely, but not annually. Groundwater sampling was conducted in 2013, 2014, 2015, 2018, and 2020 during the reporting period of this PRR.

Box 4

### Description of Engineering Controls

Parcel	Engineering Control
56.26-11-43.1	Vapor Mitigation Cover System

A soil barrier consisting of 1- foot of clean fill, or 6 inches of asphalt paving, or 6 inches of concrete slab to mitigate potential for direct contact with groundwater or soil.

SSDS installed in the on-site building is operated and maintained to effectively mitigate the potential for soil vapor exposure to building occupants

Future buildings will require a sub slab depressurization system as approved by NYSDEC to mitigate the potential for soil vapors to enter future building structures.

**Periodic Review Report (PRR) Certification Statements**

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the Engineering Control certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO



2. For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:

(a) The Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO



**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and  
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

**A Corrective Measures Work Plan must be submitted along with this form to address these issues.**

\_\_\_\_\_  
Signature of Owner, Remedial Party or Designated Representative

\_\_\_\_\_  
Date



IC CERTIFICATIONS  
SITE NO. C356032

Box 6

**\*\* See Annotations in Box 3.**

**SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE**

I certify that all information and statements in Boxes 1, 2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Richard N. Steiner at 104 Wilnot Rd, MS1446, Deerfield, IL 60015  
print name print business address

am certifying as Wylgreen Eastern Co., Inc. (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.



Signature of Owner, Remedial Party, or Designated Representative  
Rendering Certification

7/15/21  
Date

## EC CERTIFICATIONS

Box 7

### Professional Engineer Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Robert E. Murphy, P.E at AECOM, 257 West Genesee Street, Suite 400, Buffalo, New York 14202  
print name print business address

am certifying as a Professional Engineer for the Walgreen Company  
(Remedial Party)

*Robert E. Murphy*



Signature of Professional Engineer, for the Owner or  
Remedial Party, Rendering Certification

Stamp  
(Required for PE)

June 10, 2020  
Date