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Mr. Matthew Hubicki
Project Manager
NYSDEC
Division of Environmental Remediation
625 Broadway, 12th Floor
Albany, New York 12233-7016

Subject: **Soil Reuse and Dewatering Plan – Submittal #5**
Polychrome East (C360098)
City of Yonkers, Westchester County
BCP Site Number C360098

Dear Mr. Hubicki:

The following Submittal #5 has been prepared to document and provide additional detail regarding the proposed dewatering and soil reuse plan for the remediation at the Polychrome East Site at 80-94 Alexander Street in Yonkers, New York (the "site").

Soil Management – Reuse

Excavated material at the site will be segregated into two (2) categories based upon field screening using a photoionization detector (PID) and visual and olfactory observations at the following excavations outlined in the Polychrome East Remedial Action Workplan (RAWP): ISS Unit 1a [shallow excavation for in-situ soil solidification (ISS)], ISS Unit 1b (shallow excavation for ISS), and ISS Unit 2 (shallow excavation for ISS). In addition to the remedial excavations identified, this process is also proposed for soil excavated for building foundation and Site/utility work. The two soil categories include the following:

1. Excavated material that exhibits no field evidence of contamination [e.g., no observable odors, no staining, and PID readings less than 5 parts per million (ppm) above background].
2. Excavated material that exhibits limited evidence of contamination (e.g., slight odors but no obvious staining); or grossly contaminated soil as defined in DER-10, including soil that has strong odors or obvious staining.

- **Category 1** soils can be reused on-site below the site cap under the following conditions:
  - Soil must be placed at an elevation of at least 5 feet above the mean high water table.
  - Soil must be placed below concrete slabs to minimize the potential for future disturbance.
  - Placement of this material below areas paved with asphalt or pavers or below a clean soil cap is prohibited unless otherwise approved by NYSDEC.

- Excavated material shall be stockpiled and characterized for arsenic, total chromium, copper, lead and total mercury at a minimum frequency of one composite sample for every 1,000 cubic yards. The analytical results shall confirm that the soil meets the Site Specific Reuse Criteria outlined below; otherwise, the material shall be disposed off-site in accordance with applicable regulatory requirements.
    - Arsenic <= 16 mg/kg
    - Total Chromium <= 1,500 mg/kg
    - Copper <= 270 mg/kg
    - Lead <= 1,000 mg/kg
    - Total Mercury <= 2.8 mg/kg
- Stockpiled soil shall be lined and covered with bermed polyethylene (poly) sheeting in accordance with the site Stormwater Pollution Protection Plan (SWPPP). Stockpiled soil shall be at a location and elevation such that it would not be subject to periodic tidal flooding events. In the event of a major storm event forecast that may result in an extreme flooding event, contingency measures (e.g., additional hay bales or additional erosion control, movement of pile, etc.) will be implemented to manage these stockpiled soils.

- **Category 2** soils may not be reused on-site and shall be characterized and disposed off-site in accordance with applicable regulatory requirements. Any stockpiled soil shall be lined and covered with bermed poly sheeting in accordance with the site SWPPP.

Water Management

Dewatering will be required during the remediation excavation activities and foundation work for construction of pile caps and elevator pits. Various alternatives are being explored to minimize groundwater intrusion into the respective excavations. Notwithstanding, construction dewatering will be required during these activities. Groundwater extraction (pumping), treatment, and on-site discharge to groundwater can be conducted under the following conditions:

- Treatment of groundwater using the following units:
    - Oil/water separator
    - Particulate (bag) filter
    - Granular activated carbon (GAC) to remove organics
- Monitoring of treatment system consisting of the following:
    - Collection of effluent sample for analysis of VOCs and SVOCs by EPA Method 8260 and 8270.
    - Effluent results shall be compared to and meet the NYSDEC 6 NYCRR Part 703.5 Class GA Ambient Water Quality Standards (AWQS).
    - Monitoring frequency shall be at system start-up and then weekly thereafter. Monitoring frequency may be reduced to monthly after four weeks of operations if no effluent exceedances are detected.
    - Totalizer readings shall be also be collected at least weekly on the discharge side of treatment system.

- Discharge of the treated groundwater can be one of the following:
  - Treated water meeting the effluent criteria outlined above may be discharged to an on-site infiltration basin (pit).
    - All treated water discharged to an on-site basin must be fully infiltrated within the basin without overflow to on-site or off-site catch basins, or otherwise discharged off-site to adjacent properties, Alexander Street or Ashburton Avenue.
    - Treated water may not be pumped to an infiltration basin during flooding conditions where there would be a potential for fluids to be discharged to on-site or off-site catch basins, or otherwise discharged off-site to adjacent properties, Alexander Street or Ashburton Avenue.
  - Treated water may be utilized in the ISS mix.
  - Treated water may be pumped to the lateral manhole of the Westchester County Department of Environmental Facilities (WCDEF) sanitary sewer line that runs beneath Alexander Street under WCDEF permit 420-2018 provided that WCDEF approves such discharge.

Please contact me at (914) 922-2356, if you have any questions or require additional information.

Sincerely,
AKRF, Inc.

Marc S. Godick, LEP
Sr. Vice President

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