DECISION DOCUMENT

186 - 200 Westchester Avenue
Operable Unit Number 01: On Site Remedial Program
Brownfield Cleanup Program
White Plains, Westchester County
Site No. C360148
July 2017

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

DECLARATION STATEMENT - DECISION DOCUMENT

186 - 200 Westchester Avenue
Operable Unit Number: 01
Brownfield Cleanup Program
White Plains, Westchester County
Site No. C360148
July 2017

Statement of Purpose and Basis

This document presents the remedy for Operable Unit Number: 01: On Site Remedial Program of the 186 - 200 Westchester Avenue 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 Operable Unit Number: 01 of the 186 - 200 Westchester Avenue 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. 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. Excavation and off-site disposal of contaminant source areas, including:

- grossly contaminated soil, as defined in 6 NYCRR Part 375-1.2(u);
- removal of any underground storage tanks (USTs), fuel dispensers, underground piping or other structures associated with a source of contamination; and
- soils that create a nuisance condition, as defined in Commissioner Policy CP-51, Section G.

The limits of the excavation will be determined after the predesign investigation has been completed.

3. Backfill: On-site soil which does not exceed the above excavation criteria may be used below the cover system described in remedy element 4 to backfill the excavation. Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will also be brought in to replace the excavated soil or complete the backfilling of the excavation and establish the designed grades at the site. The site will be re-graded to accommodate installation of a cover system as described in remedy element 4.

4. A site cover will be required to allow for commercial use of the site in areas where the upper one foot of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). The site cover may consist of paved surface parking areas, sidewalks, or a soil cover. Where a soil cover is to be used it will be a minimum of one foot 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).

5. In-situ chemical oxidation system will be implemented to treat volatile and semi-volatile organic compounds in the groundwater and soils. A chemical oxidant will be injected into the subsurface to destroy the contaminants in an approximately 3,000 square foot area in the southern portion of 186 Westchester Avenue and approximately 1,000 square foot area in the central portion of 200 Westchester Avenue where gasoline-related compounds have been detected at higher concentrations in groundwater. The method and depth of injection will be determined during the remedial design phase of the project.

6. Institutional Control

Imposition of an institutional control in the form of an environmental easement (EE) 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 commercial use or industrial use as described in 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.

7. Site Management Plan

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

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

Institutional Controls:

- The Environmental Easement discussed in Paragraph 6 above.

Engineering Controls:

- The soil cover discussed in paragraph 4

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 future occupied buildings on site, including provision for implementing actions recommended to address exposures 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 one foot 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 groundwater to assess the performance and effectiveness of the remedy;
- schedule of monitoring and frequency of submittals to the Department; and
- monitoring for vapor intrusion for any future buildings on the site, as may be required by the Institutional and Engineering Control Plan discussed above.

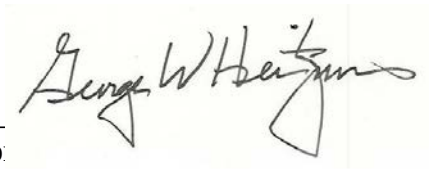
c) An Operation and Maintenance (O&M) Plan to ensure continued operation, maintenance, inspection, and reporting of any mechanical or physical components of the active vapor mitigation system(s). The plan includes, but is not limited to:
- procedures for operating and maintaining the system(s); and
- compliance inspection of the system(s) to ensure proper O&M as well as providing the data

for any necessary reporting

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.

July 27, 2017



Date

Geo

Remedial Bureau C

DECISION DOCUMENT

186 - 200 Westchester Avenue
White Plains, Westchester County
Site No. C360148
July 2017

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:

White Plains City Library
100 Martine Avenue
White Plains, NY 10601
Phone:

White Plains Public Library
Attn: Brian J. Kenney
100 Martine Avenue
White Plains, NY 10601
Phone: 914-422-1406

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: The site is located at 186 and 200 Westchester Avenue in Westchester, New York. The site consists of two lots (Lots 3 and 4) with a combined area of approximately 0.4 acres and is located in a mixed-use area consisting of commercial and light industrial properties.

Site Features:
Lot 3 (186 Westchester Avenue) is unoccupied. Prior to June 2017 the site was occupied by a gasoline service station and an inventory storage shed. Lot 4 (200 Westchester Avenue) includes the footprint of a demolished one-story brick and cinderblock building and attached garage and associated paved parking areas.

Current Zoning and Land Use: The site is located in a B-3 Zoning District, which is an Intermediate Business Zone in which a gas station and complimentary convenience store is allowed by special permit. Until 2017, Lot 3 was used as a gasoline service station. Lot 4 is vacant. Land use surrounding the site is primarily commercial and light industrial use. The nearest residential area is approximately 600 feet south of the site.

Past Use of the Site:
Lot 3 (186 Westchester Avenue)
Historically, this lot had been used as a gasoline service station and automobile garage since the 1920's. A service station occupied the site until 2017. The first petroleum spill was reported to the Department in January 1989. At various times throughout the history of this site, tanks and contaminated soils were removed and transported off-site. A pilot oxygen injection test was implemented in January 2010 with the full-scale oxygen injection implemented in May 2011. The system was shut down in February 2014. Contaminants in the groundwater are still above groundwater standards.

Lot 4 (200 Westchester Avenue)
200 Westchester Avenue was used as an ice cream plant from 1930 through the mid-1980s. From 1987 through the mid-2000s the property was used for frozen food storage. The property has been vacant since the mid-2000s. Records indicate that at some time a number two fuel oil, underground storage tank was present and possibly leaked. The tank has since been removed. A ground-penetrating radar survey, performed in January 2014, indicated that no underground tanks remain.

Site Geology and Hydrogeology:
Soils beneath the site consist of till and fluvial sand and gravel. Weathered bedrock was encountered during site investigation activities at depths of 11 to 17 feet below ground surface (bgs). Groundwater is present at the site between 5 to 7.5 feet below ground surface and flows north-northeast.

Operable Unit (OU) Number 01 (on-site) is the subject of this document.

A Decision Document will be issued for OU 02 (off-site) in the future.

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 commercial use (which allows for 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 under the Brownfield Cleanup Agreement is a Participant. The Applicant has an obligation to address on-site and off-site contamination. This decision document only addresses the on-site contamination. Additional investigation will be implemented under OU-2 to determine the nature and extent of potential off-site contamination. The status of the site's significant threat to public health and the environment will be evaluated during the additional off-site investigation to be performed by the applicant

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

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 for this Operable Unit at this site is/are:

sec-butylbenzene
ethylbenzene
isopropylbenzene
naphthalene
n-propylbenzene
toluene
1,2,4-trimethylbenzene
1,3,5-trimethylbenzene
2-methylnaphthalene
methyl-tert-butyl ether (MTBE)
benzo(a)anthracene
benzo(a)pyrene
benzo(b)fluoranthene
benzo[k]fluoranthene
chrysene
xylene (mixed)
benzene

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.

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.

Subsurface Soils
Five contaminants exceed Part 375 commercial use soil cleanup objectives (SCOs). The volatile organic compounds (VOCs) which exceed the commercial use SCOs include 1,2,4-trimethylbenzene (maximum concentration of 309 parts per million (ppm)), total xylenes (max. 603 ppm), and benzene (max. 55 ppm). The commercial use SCOs for these compounds are 190 ppm, 500 ppm, and 44 ppm, respectively. The semi-volatile compounds (SVOCs) include benzo(a)anthracene (max. 6.82 ppm) and benzo(a)pyrene (max. 5.33 ppm), with corresponding SCOs of 5.6 ppm and 1 ppm, respectively. In addition to these five contaminants which exceed commercial use SCOs, ten contaminants exceed unrestricted use soil criteria: acetone, ethylbenzene, naphthalene, n-propylbenzene, toluene, 1,3,5-trimethylbenzene, benzo(b)fluoranthene, benzo(k)fluoranthene, 2-methylnaphthalene, and chrysene at concentrations ranging from non-detect to 216 ppm . Contaminated soils have been identified in the 4 to 6-foot and the 11 to 12-foot range below ground surface.

Surface Soils
No surface soil samples were collected during the investigation because there were no exposed soils at the time due to the presence of the service station, attached garage and paved parking areas.

Groundwater
Fifteen contaminants exceed ambient groundwater quality standards. The highest concentrations include benzene (max. 609 parts per billion (ppb)), ethylbenzene, (max. 680 ppb), naphthalene, (max. 448 ppb), 1,2,4-trimethylbenzene, (max. 1,510 ppb), total xylenes, (max. 5,426 ppb). The

groundwater standard for these compounds are 1 ppb for benzene, 10 ppb for naphthalene, and 5 ppb for the others. Other compounds present in groundwater include: sec-butylbenzene, isopropylbenzene, n-butylbenzene, n-propylbenzene, p-isopropyltouluene, 2-butanone, acetone, toluene, 1,3,5-trimethylbenzene, 2-methylethylnapthalene, and methyl-tert-butyl ether (MTBE) at concentrations ranging from non-detect to 340 ppb. Contaminated groundwater has been identified in the 5 to 15-foot range below ground surface. The extent and nature of off-site groundwater impact (if any) will be determined during the OU-2 investigation.

Soil Vapor
Soil vapor samples were not collected on-site because all the buildings on site have been demolished.

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.*

Persons who dig below the ground surface may come into contact with contaminated soil or groundwater. 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 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 exists for the inhalation of site contaminants due to soil vapor intrusion in any future on-site redevelopment. The potential for soil vapor intrusion to occur in off-site buildings needs to 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.

Soil Vapor

RAOs for Public Health Protection

- Mitigate impacts to public health resulting from the potential for soil vapor intrusion into future buildings constructed 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 Cover System with Tank Removal, Soil Excavation, and In-situ Chemical Oxidation remedy.

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

1. 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. Excavation and off-site disposal of contaminant source areas, including:
• grossly contaminated soil, as defined in 6 NYCRR Part 375-1.2(u);
• removal of any underground storage tanks (USTs), fuel dispensers, underground piping or other structures associated with a source of contamination; and
• soils that create a nuisance condition, as defined in Commissioner Policy CP-51, Section G.

The limits of the excavation will be determined after the predesign investigation has been completed.

3. Backfill: On-site soil which does not exceed the above excavation criteria may be used below the cover system described in remedy element 4 to backfill the excavation. Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will also be brought in to replace the excavated soil or complete the backfilling of the excavation and establish the designed grades at the site. The site will be re-graded to accommodate installation of a cover system as described in remedy element 4.

4. A site cover will be required to allow for commercial use of the site in areas where the upper one foot of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). The site cover may consist of paved surface parking areas, sidewalks, or a soil cover. Where a soil cover is to be used it will be a minimum of one foot 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).

5. In-situ chemical oxidation system will be implemented to treat volatile and semi-volatile organic compounds in the groundwater and soils. A chemical oxidant will be injected into the subsurface to destroy the contaminants in an approximately 3,000 square foot area in the southern portion of 186 Westchester Avenue and approximately 1,000 square foot area in the central portion of 200 Westchester Avenue where gasoline-related compounds have been detected at higher concentrations in groundwater. The method and depth of injection will be determined during the remedial design phase of the project.

6. Institutional Control

Imposition of an institutional control in the form of an environmental easement (EE) 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 commercial use or industrial use as described in 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.

7. Site Management Plan

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

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

Institutional Controls:

- The Environmental Easement discussed in Paragraph 6 above.

Engineering Controls:

- The soil cover discussed in paragraph 4

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 future occupied buildings on site, including provision for implementing actions recommended to address exposures 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 one foot 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 groundwater to assess the performance and effectiveness of the remedy;
- schedule of monitoring and frequency of submittals to the Department; and
- monitoring for vapor intrusion for any future buildings on the site, as may be required by the Institutional and Engineering Control Plan discussed above.

c) An Operation and Maintenance (O&M) Plan to ensure continued operation, maintenance, inspection, and reporting of any mechanical or physical components of the active vapor mitigation system(s). The plan includes, but is not limited to:

- procedures for operating and maintaining the system(s); and
- compliance inspection of the system(s) to ensure proper O&M as well as providing the data for any necessary reporting

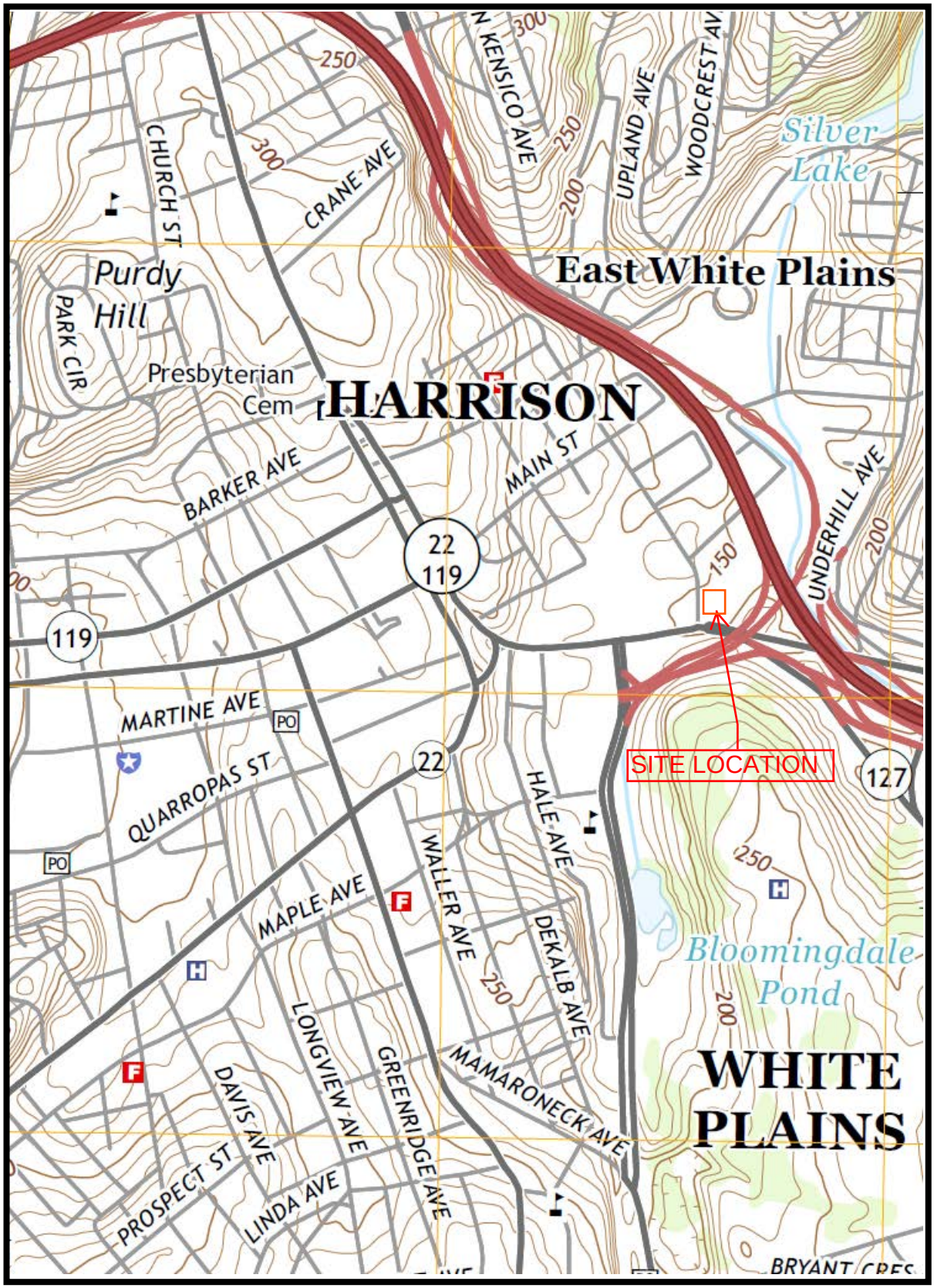
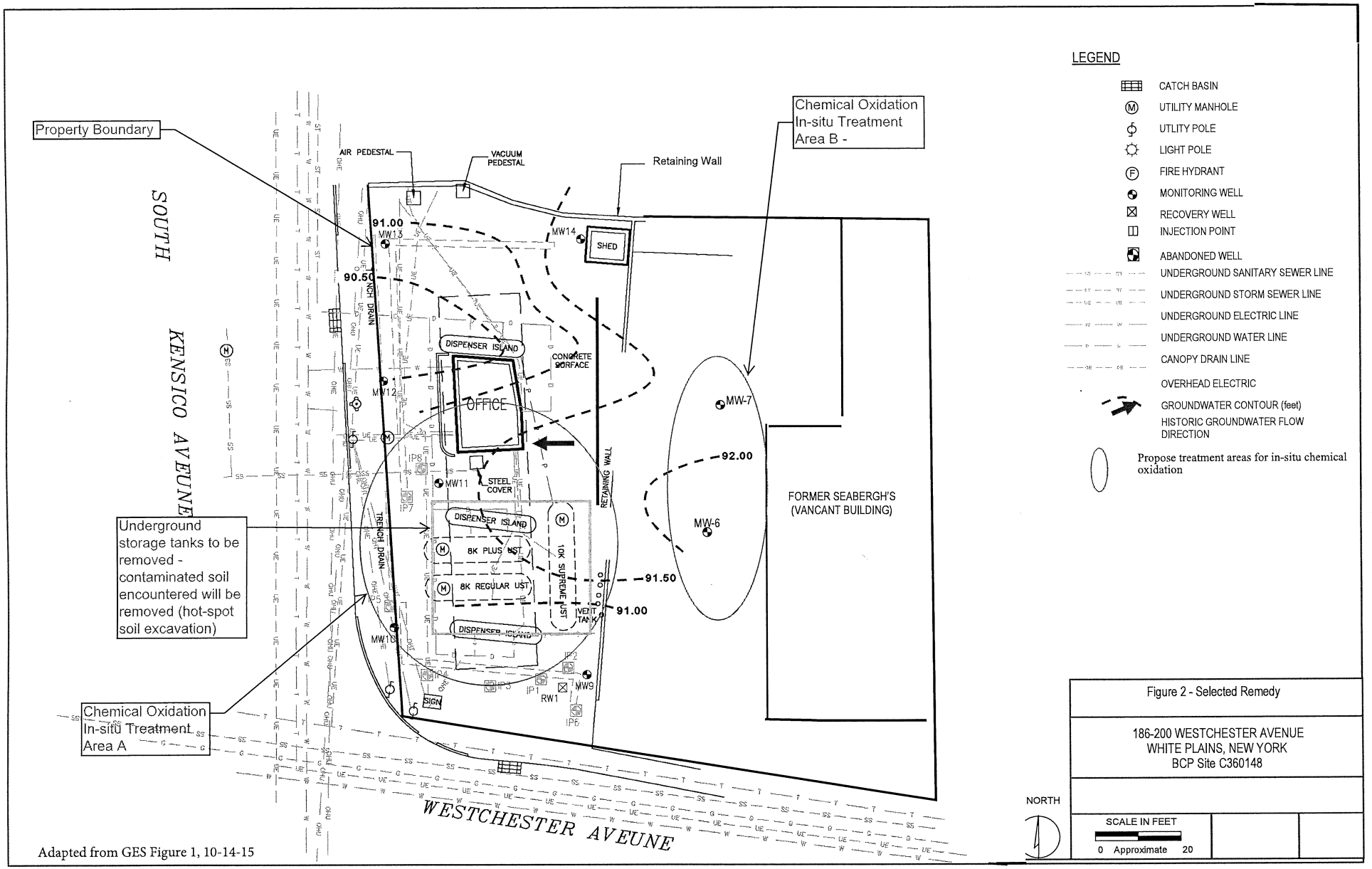


FIGURE 1 - SITE LOCATION

186 - 200 WESTCHESTER AVENUE, WHITE PLAINS, NY

Source: USGS Topographic Quadrangle, White Plains 2016
Scale: 1;24,000



Adapted from GES Figure 1, 10-14-15

Figure 2 - Selected Remedy

186-200 WESTCHESTER AVENUE
WHITE PLAINS, NEW YORK
BCP Site C360148