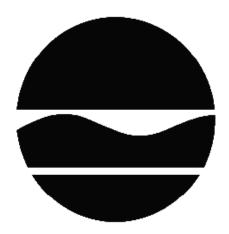
DECISION DOCUMENT

Former Oneida Knife Plant - Lot 1 Brownfield Cleanup Program Sherrill, Oneida County Site No. C633077 October 2013



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

DECLARATION STATEMENT - DECISION DOCUMENT

Former Oneida Knife Plant - Lot 1 Brownfield Cleanup Program Sherrill, Oneida County Site No. C633077 October 2013

Statement of Purpose and Basis

This document presents the remedy for the Former Oneida Knife Plant - Lot 1 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 Oneida Knife Plant - Lot 1 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, 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 Department guidance, 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 gas 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 will 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. All on-site soils which exceed industrial SCOs, except as noted below, will be excavated and transported off-site for disposal. The exceptions are:

• protection of groundwater SCOs will be used for all soils below one foot;

• protection of ecological resources SCOs will be used for soils in the vicinity of the retention pond and along the Oneida Creek stream bank.

To the extent not provided above, contaminant source areas will be excavated and disposed offsite, including:

• grossly contaminated soil, as defined in 6NYCRR Part 375-1.2(u)

• soils that create a nuisance condition, as defined in Commissioner Policy CP-51, Section G.

Approximately 1,700 cubic yards of soil will be removed from the site. Clean fill meeting the requirements of DER Appendix 5 will be brought in to replace the excavated soil and establish the designed grades at the site. On-site soil, and sediment from AOC 6, which does not exceed the SCOs for industrial use and protection of groundwater SCOs may be used to backfill excavation below the cover system described in remedy element 3. Fill required in the vicinity of the retention pond and stream bank will meet the SCOs for protection of ecological resources.

3. A site cover will be required to allow for industrial use of the site. The cover will consist of either structures such as buildings, pavement or sidewalks comprising the site development or a soil cover in areas where the upper one foot of exposed surface soil will exceed the applicable SCOs. Where the soil cover is required it will be a minimum of one foot of soil, meeting the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d) for industrial use. The cover required along the banks of the Oneida Creek will meet the protection of ecological resources SCOs. The soil cover will be placed over a demarcation layer, with the upper six inches of the soil of sufficient quality to maintain a vegetation layer. Any fill material brought to the site which may come in contact with surface water that enters Oneida Creek will meet the requirements for the protection of ecological resources as set forth in 6 NYCRR Part 375-6.7(d).

4. Imposition of an institutional control in the form of an environmental easement for the controlled property that:

- requires the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8(h)(3);

- allows the use and development of the controlled property for industrial use defined by Part 375-1.8(g), although land use is subject to local zoning laws. In the event the remedial action yields a cleanup commensurate with a higher use (e.g., commercial use), the institutional control will reflect that use;

- restricts the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County DOH; and

- requires compliance with the Department approved Site Management Plan.

5. 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 above; and
- Engineering Controls: The soil cover system discussed above.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;

- descriptions of the provisions of the environmental easement including any land use and groundwater use restrictions;

- a provision for evaluation of the potential for soil vapor intrusion for any buildings developed on the site or reoccupied, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;

- 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;

- a schedule of monitoring and frequency of submittals to the Department; and

- monitoring for vapor intrusion for any buildings occupied or developed 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, monitoring, inspection, and reporting of any mechanical or physical components of the remedy. The plan includes, but is not limited to:

- compliance monitoring of treatment systems to ensure proper O&M as well as providing the data for any necessary permit or permit equivalent reporting;

- maintaining site access controls and Department notification; and
- providing the Department access to the site and O&M records.

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.

October 11, 2013

Date

George Heitzman, Director Remedial Bureau C

DECISION DOCUMENT

Former Oneida Knife Plant - Lot 1 Sherrill, Oneida County Site No. C633077 October 2013

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: <u>CITIZEN PARTICIPATION</u>

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 repository:

Sherrill-Kenwood Free Library 543 Sherrill Road Sherrill, NY 13461 Phone: (315) 363-5980

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 Former Oneida Knife Plant, Lot 1 is located in a mixed residential, commercial and industrial setting in the City of Sherrill, Oneida County. The site is located east of Kenwood Avenue and south of the Madison County Line.

Site Features: The main features include several large abandoned buildings which comprised the Former Oneida Knife Factory. A paved parking lot and road system surround the facility to the east north and west. Former Oneida Knife Plant Lot No. 2 lies to the south and is currently owned by Omega Wire, Inc. Oneida Creek, a Class C surface water body, is located along the northern boundary of the site, and flows to the east. A surface water retention pond is located between the factory buildings and Oneida Creek.

Current Zoning/Use: The site is currently inactive and is zoned industrial. The surrounding parcels are currently used for a combination of light industrial, commercial and residential. A large portion of the surrounding properties are comprised of open space and wooded areas. The nearest residence is located approximately 600 feet to the north, across Oneida Creek.

Historic Uses: The site operated as a manufacturing facility beginning in the mid-1800s. Previous operations included silk textiles and food canning, before silverware (mainly knives) manufacturing began in the early 1900s. The main components of the manufacturing facility included forging units, furnace and boiler rooms, hot rolling, stock and trim presses, die setting, basket wash, compressor room, milling, machine shop, offices and stock rooms. The knife operation was shut down in 2006. Petroleum products used in the knife manufacturing process included lubricating oils and synthetic coolants. Fuel oil was used to heat the plant until the 1980s, when natural gas began being used to fire the boilers. Trichloroethylene (TCE) was used to clean oily parts until the mid-1990s. The TCE parts washer was located in Building 2K prior to the mid-1980s. Acid dip operations were reportedly used as part of the steel preparation during manufacturing, requiring the use of various acids and alkalis. Polychlorinated biphenyls (PCBs) were present in electrical transformers at the plant. PCB-containing equipment was decommissioned or refilled with non-PCB dielectric fluid in the 1980s and 1990s.

Site Geology and Hydrogeology: The overburden is greater than 35 feet in thickness and consists of fine-grained clay and silt deposits with interbedded units of sand and gravelly sands, including graded, gravelly and sandy clay-silt units. Fill has been placed over the site in several areas, particularly north of the building. Groundwater at the site occurs at depths of approximately 6 to 13 feet below ground surface (bgs). Groundwater flow direction is toward the north and northwest. Based on the subsurface geology of the site, groundwater discharges to Oneida Creek.

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 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. Accordingly, no enforcement actions are necessary.

SECTION 6: SITE CONTAMINATION

6.1: <u>Summary of the Remedial Investigation</u>

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 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
- sediment
- soil vapor

6.1.1: Standards, Criteria, and Guidance (SCGs)

The remedy must conform to promulgated standards and criteria that are directly applicable or that are relevant and appropriate. The selection of a remedy must also take into consideration guidance, as appropriate. Standards, Criteria and Guidance are hereafter called SCGs.

To determine whether the contaminants identified in various media are present at levels of concern, the data from the RI were compared to media-specific SCGs. The Department has developed SCGs for groundwater, surface water, sediments, and soil. The NYSDOH has developed SCGs for drinking water and soil vapor intrusion. For a full listing of all SCGs see: <u>http://www.dec.ny.gov/regulations/61794.html</u>

6.1.2: <u>RI Results</u>

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:

ACETONE	ARSENIC
VINYL CHLORIDE	BERYLLIUM
1,2-DICHLOROETHANE	CHROMIUM
BENZENE	LEAD
TRICHLOROETHENE (TCE)	MANGANESE
BENZ(A)ANTHRACENE	TETRACHLOROETHYLENE (PCE)
Chrysene	TOLUENE
BENZO(A)PYRENE	PCB-AROCLOR 1260

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

- groundwater

- soil

- sediment

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: <u>Summary of Environmental Assessment</u>

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.

Based upon the investigations conducted to date, the primary contaminants of concern for the site are petroleum-related contamination, chlorinated solvents related to a former degreasing operation, PCBs and metals. Six areas of concern (AOCs) have been found to contain impacted media that exceed industrial soil cleanup objectives (SCOs), groundwater standards or are defined as grossly contaminated based on visual, olfactory or elevated field instrument readings. Each AOC and the nature of the contamination identified within them are described below:

AOC #1 is located within the footprint of former Building 2K, which contained solvent degreasing facilities. This AOC is characterized most significantly by the presence of chlorinated volatile organic compounds in groundwater.

AOC #2 includes an area of subsurface soils impacted by petroleum compounds with moderately elevated field instrument readings located outside and north of Building 9K/4K.

AOC #3 includes an area of subsurface soils impacted by petroleum compounds outdoors and adjacent to Building 3K/5K.

AOC #4 refers to drilling locations inside Building 4K and one temporary well (TW-11A), which also contained subsurface soil impacted with petroleum compounds with moderately elevated field instrument readings in the near-surface gravelly sand unit.

AOC #5 is an indoor area, located in the upper plant Building 3K/5K. Characteristics are generally similar to and most likely attributed to the contamination in AOC #3.

AOC #6 refers to the storm water retention pond and surface soils which contain low levels of semi-volatile organic compounds and inorganic (metals) contamination.

Sediments in Oneida Creek were sampled and analyzed. The results identified exceedances of the Lowest Effect Level Criteria as defined in the Department's "Technical Guidance for Screening Contaminated Sediments" for chromium, arsenic, copper, nickel and cadmium in four of the five samples. The levels of metals in upstream samples were also similar in concentration to those immediately adjacent to the site. None of the samples exceeded the Severe Effects Level for the contaminants of concern. Surface water in Oneida Creek was also sampled and there were no exceedances of surface water standards.

Based on the sediment data and surface water quality data, no remediation of sediments in Oneida Creek is required.

Chlorinated solvents found on-site may impact indoor air quality. However, the on-site buildings are vacant and are not heated; therefore sampling for soil vapor intrusion was not conducted.

6.4: <u>Summary of Human Exposure Pathways</u>

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*.

The site is completely fenced, which restricts public access. However, persons who enter the site could contact contaminants in the soil by walking on the site, digging or otherwise disturbing the soil. 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. The potential exists for the inhalation of site contaminants due to soil vapor intrusion for any future on-site redevelopment and occupancy.

6.5: <u>Summary of the Remediation Objectives</u>

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.
- Prevent the discharge of contaminants to surface water.
- Remove the source of ground or surface water contamination.

<u>Soil</u>

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.

<u>Sediment</u>

RAOs for Environmental Protection

Restore sediments to pre-release/background conditions to the extent feasible.

<u>Soil Vapor</u>

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 Excavation 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, 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 Department guidance, 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 gas 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 will 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. All on-site soils which exceed industrial SCOs, except as noted below, will be excavated and transported off-site for disposal. The exceptions are:

- protection of groundwater SCOs will be used for all soils below one foot;
- protection of ecological resources SCOs will be used for soils in the vicinity of the retention pond and along the Oneida Creek stream bank.

To the extent not provided above, contaminant source areas will be excavated and disposed offsite, including:

- grossly contaminated soil, as defined in 6NYCRR Part 375-1.2(u)
- soils that create a nuisance condition, as defined in Commissioner Policy CP-51, Section G.

Approximately 1,700 cubic yards of soil will be removed from the site. Clean fill meeting the requirements of DER Appendix 5 will be brought in to replace the excavated soil and establish the designed grades at the site. On-site soil, and sediment from AOC 6, which does not exceed the SCOs for industrial use and protection of groundwater SCOs may be used to backfill excavation below the cover system described in remedy element 3. Fill required in the vicinity of the retention pond and stream bank will meet the SCOs for protection of ecological resources.

3. A site cover will be required to allow for industrial use of the site. The cover will consist of either structures such as buildings, pavement or sidewalks comprising the site development or a soil cover in areas where the upper one foot of exposed surface soil will exceed the applicable SCOs. Where the soil cover is required it will be a minimum of one foot of soil, meeting the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d) for industrial use. The cover required along the banks of the Oneida Creek will meet the protection of ecological resources SCOs. The soil cover will be placed over a demarcation layer, with the upper six inches of the soil of sufficient quality to maintain a vegetation layer. Any fill material brought to the site which may come in contact with surface water that enters Oneida Creek will meet the requirements for the protection of ecological resources as set forth in 6 NYCRR Part 375-6.7(d).

4. Imposition of an institutional control in the form of an environmental easement for the controlled property that:

- requires the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8(h)(3);

- allows the use and development of the controlled property for industrial use defined by Part 375-1.8(g), although land use is subject to local zoning laws. In the event the remedial action yields a cleanup commensurate with a higher use (e.g., commercial use), the institutional control will reflect that use;

- restricts the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County DOH; and

- requires compliance with the Department approved Site Management Plan.

5. 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 above; and

- Engineering Controls: The soil cover system discussed above.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;

- descriptions of the provisions of the environmental easement including any land use and groundwater use restrictions;

- a provision for evaluation of the potential for soil vapor intrusion for any buildings developed on the site or reoccupied, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;

- 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;

- a schedule of monitoring and frequency of submittals to the Department; and

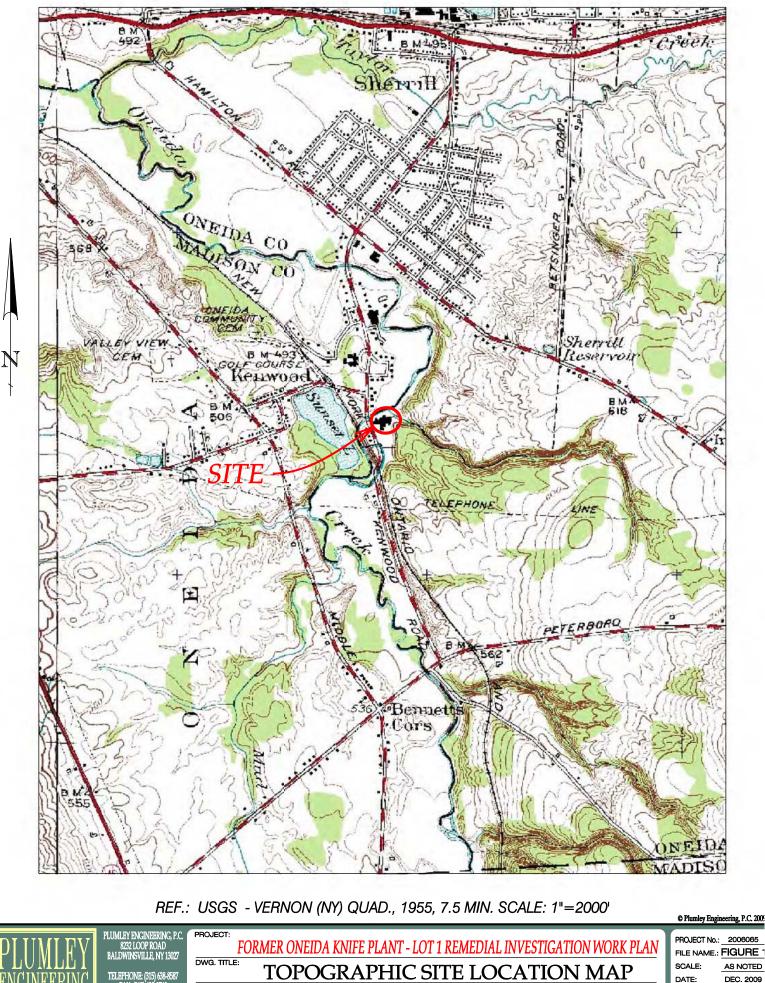
- monitoring for vapor intrusion for any buildings occupied or developed on the site, as may be required by the Institutional and Engineering Control Plan discussed above.

c. an Operation and Maintenance (O&M) Plan to ensure continued operation, maintenance, monitoring, inspection, and reporting of any mechanical or physical components of the remedy. The plan includes, but is not limited to:

- compliance monitoring of treatment systems to ensure proper O&M as well as providing the data for any necessary permit or permit equivalent reporting;

- maintaining site access controls and Department notification; and

- providing the Department access to the site and O&M records.



 Client:
 ONEIDA SILVERSMITH, INC.

 Civiliand Environmental Engineering
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 ONEIDA SILVERSMITH, INC.

 Note: No alteration permitted hereon except as provided under Section 7209 Subdivision 2 of the New York State Education Law.
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 SCALE:
 AS NOTED

 DATE:
 DEC. 2009

 ENG'D BY:
 DRV

 DRAWN BY:
 JMD

 CHECKED BY:
 DRV

