DECISION DOCUMENT

800 Hiawatha Boulevard West (former Roth Steel)
Brownfield Cleanup Program
Syracuse, Onondaga County
Site No. C734083
October 2025



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

DECLARATION STATEMENT - DECISION DOCUMENT

800 Hiawatha Boulevard West (former Roth Steel)
Brownfield Cleanup Program
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Statement of Purpose and Basis

This document presents the remedy for the 800 Hiawatha Boulevard West (former Roth Steel) 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 (NYSDEC) for the 800 Hiawatha Boulevard West (former Roth Steel) site and the public's input to the proposed remedy presented by NYSDEC.

Description of Selected Remedy

The elements of the selected remedy are as follows:

1. Remedial Design

A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows:

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse 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 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;
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development; and
- Additionally, to incorporate green remediation principles and techniques to the extent

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feasible in the future development at this site, any future on-site buildings shall be constructed, at a minimum, to meet the 2020 Energy Conservation Construction Code of New York (or most recent edition) to improve energy efficiency as an element of construction.

As part of the remedial design program, to evaluate the remedy with respect to green and sustainable remediation principles, an environmental footprint analysis will be completed. The environmental footprint analysis will be completed using an accepted environmental footprint analysis calculator such as SEFA (Spreadsheets for Environmental Footprint Analysis, USEPA), SiteWise(TM) (available in the Sustainable Remediation Forum [SURF] library) or similar NYSDEC accepted tool. Water consumption, greenhouse gas emissions, renewable and nonrenewable energy use, waste reduction and material use will be estimated, and goals for the project related to these green and sustainable remediation metrics, as well as for minimizing community impacts, protecting habitats and natural and cultural resources, and promoting environmental justice, will be incorporated into the remedial design program, as appropriate. The project design specifications will include detailed requirements to achieve the green and sustainable remediation goals. Further, progress with respect to green and sustainable remediation metrics will be tracked during implementation of the remedial action and reported in the Final Engineering Report (FER), including a comparison to the goals established during the remedial design program.

Additionally, the remedial design program will include a climate change vulnerability assessment, to evaluate the impact of climate change on the project site and the proposed remedy. Potential vulnerabilities associated with extreme weather events (e.g., hurricanes, lightning, heat stress and drought), flooding, and sea level rise will be identified, and the remedial design program will incorporate measures to minimize the impact of climate change on potential identified vulnerabilities.

2. Excavation

Excavation and off-site disposal of contaminant source areas, including:

- Petroleum-impacted grossly contaminated soil, as defined in 6 NYCRR Part 375-1.2(u), in the vicinity of a test pit installed south of Building 1;
- solid hazardous substances per 6 NYCRR Part 375-1.2(au)(1) mostly consisting of automobile shredder residue (ASR), the former shredder belt, and a pile of large rubber tires; and
- Soil in in the northwestern corner of the site that is immediately north of the elevated Onondaga Lake trail system (Trail) that exceeds the industrial use SCO for PCBs of 25 parts per million (ppm) will be excavated and transported offsite for disposal. Following excavation and backfilling, this area will be secured with fencing and inaccessible. Soil on the remainder of the site which exceeds a site-specific cleanup goal of 10 ppm PCBs will be excavated and transported off-site for disposal.

In total, approximately 800 cubic yards of PCB contaminated soil will be excavated and transported off-site for disposal. Collection and analysis of confirmation samples at the remedial excavation depth will be used to verify that the above excavation goals have been achieved. If

confirmation sampling indicates that these goals were not achieved at the stated remedial depth, the Applicant must notify NYSDEC, submit the sample results and in consultation with NYSDEC, determine if further remedial excavation is necessary. Further excavation for development may proceed after confirmation samples demonstrate that the above excavation goals have been achieved.

To ensure proper handling and disposal of excavated material, waste characterization sampling will be completed for all identified contaminated site material. Waste characterization sampling will be performed exclusively for the purposes of off-site disposal in a manner suitable to receiving facilities and in conformance with applicable federal, state, and local laws, rules, and regulations and facility-specific permits.

3. Backfill

On-site soil which does not exceed 10 ppm PCBs and industrial use soil cleanup objectives (SCOs), as defined by 6 NYCRR 375-6.8, may be used below the cover system described in remedy element 4 (Cover System) to backfill the excavation to the extent that a sufficient volume of on-site soil is available and to establish the designed grades at the site.

Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to replace the excavated soil and to 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.

Building concrete slabs were sampled for PCB analysis prior to building demolition. Based on this sampling, the concrete slabs for Buildings 3, 4 and 5; and portions of Buildings 1 and 6 contained PCBs at concentrations less than 1 ppm and will be crushed on-site and used as backfill or left in place as part of the cover system. The Building 2 concrete slab contained PCB concentrations greater than 1 ppm and less than 10 ppm and will be crushed and used as backfill below the cover system (remedy element 4). Portions of the concrete slabs from Buildings 1 and 6, which contained PCBs greater than 10 ppm and less than 25 ppm, will be used as backfill in the secured area within the northwestern portion of the site or transported off-site for disposal.

4. Cover System

A site cover will be required in areas where the upper one foot of exposed surface soil will exceed the applicable SCOs, to allow for future commercial use on the Trail and industrial use on the remainder of the site. A pre-design investigation will be conducted in the portion of the site not already determined to require a one-foot cover to verify the extent of the cover limits. 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 for the use of the site as set forth in 6 NYCRR Part 375-6.7(d). Substitution of other materials and components may be allowed where such components already exist or are a component of the tangible property

to be placed as part of site redevelopment. Such components may include, but are not necessarily limited to: pavement, concrete, paved surface parking areas, sidewalks, building foundations and building slabs.

5. **Engineering and Institutional Controls**

Imposition of an institutional control in the form of an Environmental Easement and a Site Management Plan, as described below, will be required. The remedy will achieve a Track 4 commercial and industrial cleanup at a minimum.

Institutional Control

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

- require the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
- allow the use and development of the controlled property for commercial use on the 1.7acre portion of the site that includes the Trail and the area below the elevated portion of the Trail spanning the northwestern corner of the site that was previously remediated; and industrial use on the remainder of the site as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- restrict the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or the Onondaga County Health Department; and
- require compliance with the NYSDEC approved Site Management Plan.

6. Site Management Plan

A Site Management Plan is required which includes the following:

An Institutional and Engineering Control Plan that identifies all use restrictions and A. 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 remedy element 5 above.

Engineering Controls: The cover system discussed in remedy element 4 and the secured fencing discussed in remedy element 2.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- a provision for further investigation and remediation should large scale redevelopment occur, or if the subsurface is otherwise made accessible. The nature and extent of contamination in areas where access was previously limited or unavailable will be

immediately and thoroughly investigated pursuant to a plan approved by the NYSDEC. Based on the investigation results and the NYSDEC determination of the need for a remedy, a Remedial Action Work Plan (RAWP) will be developed for the final remedy for the site, including removal and/or treatment of any source areas to the extent feasible. Citizen Participation Plan (CPP) activities will continue through this process. Any necessary remediation will be completed prior to, or in association with, redevelopment;

- a provision should redevelopment occur to ensure no soil exceeding protection of groundwater concentrations will remain below storm water retention basin or infiltration structures:
- 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 occupied buildings on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
- provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in remedy element 4 above will be placed in any areas where the upper one foot of exposed surface soil exceeds the applicable soil cleanup objectives (SCOs);
- provisions for the management and inspection of the identified engineering controls;
- maintaining site access controls and NYSDEC notification; and
- the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.

Declaration

The remedy conforms with promulgated standards and criteria that are directly applicable, or that are relevant and appropriate and takes into consideration NYSDEC guidance, as appropriate. The remedy is protective of public health and the environment.

October 20, 2025	
Date	Jason Pelton, Director
	Remedial Bureau D

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SECTION 1: SUMMARY AND PURPOSE

The New York State Department of Environmental Conservation (NYSDEC), 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, where a contaminant is present at levels exceeding the soil cleanup objectives or other health-based or environmental standards, criteria or guidance, based on the reasonably anticipated use of the property.

NYSDEC 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

NYSDEC 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 NYSDEC 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:

DECInfo Locator - Web Application https://gisservices.dec.ny.gov/gis/dil/index.html?rs=C734083

Onondaga County Public Library - Kinchen Central Library The Galleries of Syracuse 447 South Salina Street Syracuse, NY 13202

Phone: 315-435-1900

NYS Dept of Environmental Conservation - Region 7 5786 Widewaters Parkway Syracuse, NY 13214

Phone: 315-426-7551

Receive Site Citizen Participation Information By Email

Please note that NYSDEC'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 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 approximately 15.12-acre 800 Hiawatha Boulevard West site is located at 800 Hiawatha Boulevard West in the City of Syracuse and comprises the eastern and northern portions of the Former Roth Steel facility. The site is located along the southern shore of Onondaga Lake in an urban area north of the intersection of Hiawatha Boulevard with State Fair Boulevard (see Figure 1). The site is bounded by the Onondaga Metropolitan Wastewater Treatment Plant to the north; Hiawatha Boulevard to the southeast; State Fair Boulevard to the south; and a truck stop to the west. The western portion of the site shares a property boundary with the Former Roth Steel Site State Superfund Site No. 734083.

Site Features: The site includes portions of four tax parcels and has approximately 1,300 feet of road frontage along Hiawatha Boulevard. The undeveloped areas of the site are inside an eightfoot-high chain-link fence. Historically, the site contained six buildings that were demolished by Onondaga County Industrial Development Agency (OCIDA) in 2018, but the concrete building slabs remain. Although some asphalt paved driveways exist near former building locations, the majority of the site is primarily unvegetated with dense, packed gravel or fill. Solid waste debris consisting of Automobile Shredder Residue (ASR), metal fragments, plastic, and glass are present across the majority of the site surface. The northwestern section of the site contains part of an underground former ASR Disposal Cell.

A 1.7-acre strip of land along the north boundary of the site has been remediated and developed as an extension to the Onondaga Canalways Trail (Trail). The at-grade portion of the Trail is fenced off and is primarily paved with bordering vegetative areas. The northwest section of the Trail is elevated and connects to a pedestrian bridge which rises to span the railroad tracks located just north of the property boundary.

Current Zoning and Land Use: The site is currently vacant and is zoned as an industrial district. The surrounding parcels are used for commercial and industrial uses. Adjacent to the north side of the site is CSX railroad tracks and Onondaga Lake. Properties to the east-southeast and across Hiawatha Boulevard include a metals plating facility, a vacant former tank manufacturing site,

offices and a used car dealership. Adjacent properties to the south include commercial businesses.

Past Use of the Site: Historically, the general area was known for its widespread marshes that were mined for their salt content from the 1600s to the early 1900s. From 1916 to 1944, the Solvay Process Company deposited large quantities of Solvay waste along the south end of Onondaga Lake. Solvay waste refers to the byproducts and waste materials generated from the production of soda ash and primarily consists of calcium chloride, calcium carbonate, and other limestone impurities. Much of the site is underlain with this Solvay waste. From the 1950s to 2014, the site operated as a metal processing and recycling center.

Investigations of the environmental conditions at the Former Roth Steel facility (current 800 Hiawatha Boulevard West BCP Site and Roth Steel State Superfund Site) began in the 1960s. In the early 1990s, investigation of two ASR cells located along the northwestern boundary of the former facility occurred with oversight by NYSDEC. As a result of investigations, Roth Steel entered into two consent orders with the NYSDEC for the property, Consent Order D7-1015-1 l-04 dated December 28, 2007, and Consent Order R7-20121101-89 dated January 31, 2013. The consent orders required investigations of petroleum and solid waste to determine if any contaminants were being released or migrating from the two ASR cells into groundwater and/or Onondaga Lake; and investigation and removal of two aboveground piles of ASR. The Consent Orders were extinguished as a result of the Roth Steel bankruptcy in 2014. The former facility was divided into two areas in August 2021; the State Superfund site mentioned above and the BCP site known as 800 Hiawatha Boulevard West, which is the subject of this decision document.

Operable Units: The site was divided into two Operable Units. An Operable Unit (OU) represents a portion of a remedial program for a site that for technical or administrative reasons can be addressed separately to investigate, eliminate, or mitigate a release, threat of release, or exposure pathway resulting from the site contamination.

Operable Unit 1 (OU1) is the 13.45-acre portion of the site along Hiawatha Boulevard and includes the small 0.4-acre area in the northwestern corner of the site north of the elevated portion of the Trail. A portion of ASR Disposal Cell 2 extends into this area (see Figure 2).

Operable Unit 2 (OU2) is the 1.7-acre portion of the site that includes the Trail and the area below the elevated portion of the Trail spanning the northwestern corner of the site that was previously remediated.

It should be noted that the site was broken up into three OUs in the Remedial Work Plan submitted for the site. The 0.4-acre area in the northwestern corner of the site was identified as OU1, the portion of the site south of the Trail was identified as OU2, and Trail was identified as OU3.

Site Geology and Hydrogeology: The site consists of fill overlying native deposits. The upper portion of the fill consists of gravel-sized material with lesser amounts of sand and silt. In some locations the fill contains small quantities of cinder, ash, plastic, brick, glass, metal, and wood. The lower portion of the fill contains Solvay waste in some areas. The Solvay waste is a white to light grey silt sized granular material. The underlying native deposits beginning at approximately 12 feet below grade, consist of a brown or gray sand and varying amounts of silt, with shells at

some locations. Shallow groundwater exists in unconfined conditions within the fill. The depth to groundwater generally ranges from 5 feet to 10 feet below ground surface. The direction of groundwater flow is northwest toward Onondaga Lake.

A site location map is attached as Figure 1.

SECTION 4: LAND USE AND PHYSICAL SETTING

NYSDEC 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 OU1, alternatives that restrict the use of the site to industrial use as described in Part 375-1.8(g) were evaluated in addition to an alternative which would allow for unrestricted use of the site. OU2 was remediated as an interim remedial measure prior to development as the Onondaga Canalways Trail. The remedy for OU2 restricts the use to commercial use as described in Part 375-1.8(g).

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(s) under the Brownfield Cleanup Agreement is a/are Volunteer(s). The Applicant(s) does/do not have an obligation to address off-site contamination. However, NYSDEC has determined that this site does not pose a significant threat to public health or the environment; accordingly, no enforcement actions are necessary.

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
- 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. NYSDEC 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** 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 contaminants of concern identified at this site are:

polychlorinated biphenyls (PCBs)
cadmium
perfluorooctane sulfonic acid (PFOS)
perfluorooctanoic acid (PFOA)
benzene
barium
arsenic
mercury
copper
perfluorooctane sulfonic acid (PFOS)
perfluorooctanoic acid (PFOA)
benzene
ethylbenzene
toluene
xylene (mixed)
methyl tert-butyl ether (MTBE)

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.

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The following IRMs have been completed at this site based on conditions observed during the RI.

IRM Waste Removal (Site-wide)

Between 2015 and 2017, the following contaminant source areas, including concentrated solid and semi-solid hazardous substances per 6 NYCRR Part 375-1.2(au)(1) were consolidated and properly disposed off-site:

- Approximately fifty 55-gallon drums and other assorted containers of oil and liquids;
- One 55-gallon drum of PCB capacitors;
- Two bins containing apparent process waste (shredded metal and wire) exceeding the 6 NYCRR Part 371 hazardous criteria for cadmium; and
- Two piles of Automobile Shredder Residue (ASR) totaling approximately 2,000 cubic yards.

To ensure proper handling and disposal of the hazardous substances, waste characterization sampling was completed. Waste characterization sampling was performed exclusively for the purposes of off-site disposal in a manner suitable to receiving facilities and in conformance with applicable federal, state and local laws, rules, and regulations and facility- specific permits.

IRM Soil Excavation and Cover System - Trail Area (OU2)

In 2020, the Onondaga County Department of Transportation in cooperation with OCIDA, NYSDEC and the United State Environmental Protection Agency (USEPA), performed an IRM to allow for construction of the Trail extension across the site from the Honeywell property located along Onondaga Lake east to Hiawatha Boulevard.

The elements of the IRM included:

Excavation

All soil in the upper one foot which exceeded the commercial SCOs was excavated and transported off-site for disposal.

Soil below one foot which exceeded 10 ppm for PCBs was excavated and transported off-site for disposal. Some PCB contaminated soil was not accessible due to the presence of underground utilities.

As part of this IRM, a total of approximately 2,270 tons of PCB-contaminated soil and ASR located within ASR Disposal Cell 2 were removed during construction of the Trail, of which 362 tons were classified as hazardous. Confirmation samples were collected and analyzed at the remedial excavation depths to verify that commercial use SCOs for PCBs were achieved.

Backfill

Following excavation, soil which did not exceed SCOs was used below the cover system as described below to backfill the excavation and establish design grades.

Additionally, backfill meeting the requirements of 6 NYCRR Part 375-6.7(d) was transported to the site to complete backfilling of excavations.

Cover System

Placement of a cover system consisting of a one-foot-thick soil cover and six inches of asphalt over the at-grade portion of the Trail. A demarcation layer was placed below the soil cover, with the upper six inches of soil of sufficient quality to maintain a vegetative layer.

Placement of an USEPA-approved cap consisting of six inches of asphalt below the 120-foot elevated portion of the Trail over remaining PCB-impacted soils which could not be excavated due to the presence of utilities.

6.3: **Summary of Environmental Assessment**

This section summarizes the assessment of existing and potential future environmental impacts presented by the site. Environmental impacts may include existing and potential future exposure pathways to fish and wildlife receptors, wetlands, groundwater resources, and surface water. The RI report presents a detailed discussion of any existing and potential impacts from the site to fish and wildlife receptors.

Nature and Extent of Contamination:

Soil and groundwater were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), metals and per- and polyfluoroalkyl substances (PFAS). Automobile Shredder Residue (ASR) was analyzed for PCBs and Total Characteristic Leaching Procedure (TCLP) metals. Subslab soil vapor was analyzed for VOCs in two locations below the existing slabs. Based upon investigations conducted to date, the primary contaminants of concern include PCBs and metals.

Soil:

Shallow Soil:

PCBs were not detected above the industrial use Soil Cleanup Objective (SCO) of 25 ppm in shallow soils. PCBs exceed the commercial use SCO of 1 ppm in 15 locations, with a maximum concentration of 18.3 ppm in the northwestern corner of the site in the ASR Disposal Cell 2. With the exception of the aforementioned location, PCBs do not exceed 10 ppm in surface soil.

Cadmium exceeded the industrial use SCO of 60 ppm in one location at a concentration of 2,140 ppm and the commercial use SCO of 9.3 ppm in five locations. Other metals including arsenic, barium and copper exceeded commercial use SCOs at maximum concentrations of 28.4 ppm (SCO of 16 ppm), 430 ppm (SCO of 400 ppm), and 5,460 ppm (SCO of 270 ppm), respectively. The majority of exceedances were located in the former scrap yard metal storage area (see Figure 3).

SVOCs that exceeded industrial use SCOs in shallow soil were limited to polyaromatic hydrocarbons (PAHs), including benzo(a)pyrene. PAHs were detected in seven shallow soil locations above the industrial use SCO of 1 ppm, at a maximum concentration of 10 ppm.

There were no commercial or industrial use exceedances of VOCs in shallow soil.

PFOS was detected in shallow soil slightly above the protection of groundwater guidance value of 0.001 ppm in two locations at 0.00217 ppm and 0.00168 ppm, well below the commercial and industrial guidance value of 0.440 ppm

Subsurface Soil:

PCBs were sampled in subsurface soil in 31 locations across the site and were generally detected in shallow subsurface soil down to approximately six feet below ground surface (bgs). PCBs were detected above the industrial use SCO of 25 ppm in two locations. Specifically, PCBs were detected at 38.1 ppm from three to five feet bgs in the northwestern portion of the site in ASR Disposal Cell 2; and at 29.5 ppm at four feet bgs just north of the former metal storage area located in the central portion of the site. PCBs were detected above the commercial use SCO of 10 ppm at two to four feet bgs in two locations at concentrations of 14.9 ppm in the former metal storage area and 21.5 ppm in the southern portion of the site west of Building 6.

The highest metal concentrations in the subsurface soil samples were detected in the top five feet in the former scrap storage area. Specifically, arsenic was detected above the industrial use SCO of 16 ppm at a maximum concentration of 28.4 ppm in five locations. Mercury and zinc were also detected in subsurface soil in this area at 6.4 ppm and 21,400 ppm (at depths of approximately 4.5 to 5 feet bgs), above their respective industrial use SCOs of 5.7 ppm and 10,000 ppm, respectively. Lead was detected above the industrial use SCO of 3,900 ppm at a concentration of 4,650 ppm in a soil sample collected from this same area at depth of six to eight feet bgs.

The most commonly detected metals that exceeded commercial use SCOs in subsurface soils were cadmium, copper, and lead at concentrations of 2,140 ppm, 5,460 ppm, and 2,440 ppm, respectively, as compared to their commercial use SCOs of 9.3 ppm, 270 ppm, and 1,000 ppm.

Petroleum-impacted grossly contaminated soil was encountered between two and eight feet below ground surface in a test pit excavated approximately 100 feet south of Building 1. A geophysical survey conducted in this area confirmed no indication of an underground tank. Soil samples from the test pit were analyzed for PCBs, VOCs, SVOCs, metals, and included a Total Petroleum Hydrocarbon (TPH) Identification analysis. The TPH Identification test determined that the sample contained a mixture resembling gasoline and used motor oil. Although free product was observed in the test pit, laboratory results indicate that the soil concentrations of VOCs, SVOCs, and PCBs were below Restricted Residential Use SCOs. No free product was observed in two test pits installed immediately south of the original test pit, therefore the petroleum impacted soil has been determined to be very limited in extent and restricted to the area of the test pit.

While PCBs were present at concentrations exceeding commercial use SCOs in subsurface soil in the OU2 area (Trail area), these PCBs have been addressed as part of an earlier IRM (See Section 6.2 Interim Remedial Measures).

Groundwater:

PCBs have not detected in groundwater since 2012. The detections of PCBs in 2012 were attributed to elevated turbidity in the samples. PCBs were not detected in the two most recent groundwater sampling events (March 2013 and December 2017). Barium was the only metal detected in groundwater and was detected in samples collected from two monitoring wells at a concentration of 1,400 part per billion (ppb); slightly above the NYSDEC groundwater quality standard of 1,000 ppb. The barium was detected in monitoring wells located in the central portion of the site in the vicinity of the former scrap metal storage area.

Petroleum-related VOCs were also detected in groundwater in monitoring wells in this area above NYSDEC groundwater quality standards, with maximum concentrations occurring in groundwater from a monitoring well immediately downgradient of the former scrap metal storage area. Specifically, benzene, toluene, ethyl benzene, xylene and methyl tert-butyl ether (MTBE) were detected in groundwater samples collected from this well at concentrations of 26 ppb, 41 ppb, 20 ppb, 23 ppb, and 40 ppb, respectively, as compared to the NYSDEC groundwater quality standards of 1 ppb (benzene), 5 ppb (toluene, ethyl benzene, xylene), and 10 ppb (MTBE). The most recent round of groundwater sampling from this well shows that VOC concentrations have decreased up to an order of magnitude since a March 2013 sampling event, indicating that natural bioattenuation is occurring.

Benzene and MTBE were detected in groundwater at the site boundary downgradient of the metal storage area and Building 1 at concentrations of 3.4 ppb and 11.6 ppb, respectively, only marginally above the groundwater standards.

Groundwater samples were collected from three monitoring wells for emerging contaminants (PFAS and 1,4-dioxane) in May of 2021. Maximum concentrations of PFOA, PFOS, and 1,4dioxane were detected in the onsite upgradient well at concentrations of 382 nanograms per liter (ng/L) or parts per trillion (ppt), 1,560 ppt, and 2.59 ppt, respectively. PFOA, PFOS, and 1,4dioxane were detected at maximum concentrations of 199 ppt, 220 ppt, and 2.41 ppb, respectively in the remaining two on-site groundwater samples, as compared to NYSDEC ambient water quality guidance values of 6.7 ppt, 2.7 ppt, and 1 ppb for PFOA, PFOS, 1,4-dioxane, respectively.

Data does not indicate that there are off-site impacts in groundwater related to this site.

Soil Vapor:

Soil vapor samples were collected from beneath the Building 1 and Building 4 concrete slabs. Several petroleum VOCs were detected in subslab vapor, including benzene, 1,2,4trimethylbenzene, toluene, cyclohexane, n-hexane and heptane at maximum concentrations of 6.87 micrograms per cubic meter (ug/m³) μ g/m³, 1.11 μ g/m³, 5.65 μ g/m³, 42.3 μ g/m³, 70.8 μ g/m³, and 39.5 µg/m³, respectively. Soil vapor sampling results do not warrant actions to address soil vapor intrusion at this time as all onsite buildings have been removed from the site. There are no offsite impacts to soil vapor attributable to the BCP site.

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*.

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, and people who dig below the ground surface may come into contact with contaminants in subsurface soil and groundwater. The Onondaga Trail Extension crosses the site; however, with the exception of the elevated portion in the northwestern corner of the site, the Trail is completely fenced, preventing contact with contaminated soil. Further, contact with contaminants is unlikely in the area of the Trail because remedial activities were completed including installation of a pavement or soil cover system. 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 soil vapor (air spaces within the soil) may move into 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. However additional information is needed to determine if the potential exists for the inhalation of site contaminants due to soil vapor intrusion for any future on-site development. Environmental sampling indicates off-site soil vapor intrusion from site contaminants is not a concern.

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

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

Soil

RAOs for Public Health Protection

Prevent ingestion/direct contact with contaminated soil.

• Prevent inhalation of or exposure from contaminants volatilizing from contaminants in soil.

RAOs for Environmental Protection

- Prevent migration of contaminants that would result in groundwater or surface water contamination.
- Prevent impacts to biota from ingestion/direct contact with soil causing toxicity or impacts from bioaccumulation through the terrestrial food chain.

Soil Vapor

RAOs for Public Health Protection

• Mitigate impacts to public health resulting from existing, or the potential for, soil vapor intrusion into buildings at a site.

SECTION 7: ELEMENTS OF THE SELECTED REMEDY

The alternatives developed for the site and the evaluation of the remedial criteria are presented in the Alternative Analysis. The remedy is selected pursuant to the remedy selection criteria set forth in DER-10, Technical Guidance for Site Investigation and Remediation and 6 NYCRR Part 375.

The selected remedy is a Track 4: Restricted use with site-specific soil cleanup objectives remedy.

The selected remedy is referred to as the Restoration to Industrial and Commercial Use remedy.

The elements of the selected remedy, as shown in Figure 3, are as follows:

1. Remedial Design

A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows:

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse 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 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;
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development; and
- Additionally, to incorporate green remediation principles and techniques to the extent feasible in the future development at this site, any future on-site buildings shall be constructed, at

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a minimum, to meet the 2020 Energy Conservation Construction Code of New York (or most recent edition) to improve energy efficiency as an element of construction.

As part of the remedial design program, to evaluate the remedy with respect to green and sustainable remediation principles, an environmental footprint analysis will be completed. The environmental footprint analysis will be completed using an accepted environmental footprint analysis calculator such as SEFA (Spreadsheets for Environmental Footprint Analysis, USEPA), SiteWise(TM) (available in the Sustainable Remediation Forum [SURF] library) or similar NYSDEC accepted tool. Water consumption, greenhouse gas emissions, renewable and nonrenewable energy use, waste reduction and material use will be estimated, and goals for the project related to these green and sustainable remediation metrics, as well as for minimizing community impacts, protecting habitats and natural and cultural resources, and promoting environmental justice, will be incorporated into the remedial design program, as appropriate. The project design specifications will include detailed requirements to achieve the green and sustainable remediation goals. Further, progress with respect to green and sustainable remediation metrics will be tracked during implementation of the remedial action and reported in the Final Engineering Report (FER), including a comparison to the goals established during the remedial design program.

Additionally, the remedial design program will include a climate change vulnerability assessment, to evaluate the impact of climate change on the project site and the proposed remedy. Potential vulnerabilities associated with extreme weather events (e.g., hurricanes, lightning, heat stress and drought), flooding, and sea level rise will be identified, and the remedial design program will incorporate measures to minimize the impact of climate change on potential identified vulnerabilities.

2. Excavation

Excavation and off-site disposal of contaminant source areas, including:

- Petroleum-impacted grossly contaminated soil, as defined in 6 NYCRR Part 375-1.2(u), in the vicinity of a test pit installed south of Building 1;
- solid hazardous substances per 6 NYCRR Part 375-1.2(au)(1) mostly consisting of automobile shredder residue (ASR), the former shredder belt, and a pile of large rubber tires: and
- Soil in in the northwestern corner of the site that is immediately north of the elevated Onondaga Lake trail system (Trail) that exceeds the industrial use SCO for PCBs of 25 parts per million (ppm) will be excavated and transported offsite for disposal. Following excavation and backfilling, this area will be secured with fencing and inaccessible. Soil on the remainder of the site which exceeds a site-specific cleanup goal of 10 ppm PCBs will be excavated and transported off-site for disposal.

In total, approximately 800 cubic yards of PCB contaminated soil will be excavated and transported off-site for disposal. Collection and analysis of confirmation samples at the remedial excavation depth will be used to verify that the above excavation goals have been achieved. If confirmation sampling indicates that these goals were not achieved at the stated remedial depth,

the Applicant must notify NYSDEC, submit the sample results and in consultation with NYSDEC, determine if further remedial excavation is necessary. Further excavation for development may proceed after confirmation samples demonstrate that the above excavation goals have been achieved.

To ensure proper handling and disposal of excavated material, waste characterization sampling will be completed for all identified contaminated site material. Waste characterization sampling will be performed exclusively for the purposes of off-site disposal in a manner suitable to receiving facilities and in conformance with applicable federal, state, and local laws, rules, and regulations and facility-specific permits.

3. Backfill

On-site soil which does not exceed 10 ppm PCBs and industrial use soil cleanup objectives (SCOs), as defined by 6 NYCRR 375-6.8, may be used below the cover system described in remedy element 4 (Cover System) to backfill the excavation to the extent that a sufficient volume of on-site soil is available and to establish the designed grades at the site.

Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to replace the excavated soil and to 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.

Building concrete slabs were sampled for PCB analysis prior to building demolition. Based on this sampling, the concrete slabs for Buildings 3, 4 and 5; and portions of Buildings 1 and 6 contained PCBs at concentrations less than 1 ppm and will be crushed on-site and used as backfill or left in place as part of the cover system. The Building 2 concrete slab contained PCB concentrations greater than 1 ppm and less than 10 ppm and will be crushed and used as backfill below the cover system (remedy element 4). Portions of the concrete slabs from Buildings 1 and 6, which contained PCBs greater than 10 ppm and less than 25 ppm, will be used as backfill in the secured area within the northwestern portion of the site or transported off-site for disposal.

4. Cover System

A site cover will be required in areas where the upper one foot of exposed surface soil will exceed the applicable SCOs, to allow for future commercial use on the Trail and industrial use on the remainder of the site. A pre-design investigation will be conducted in the portion of the site not already determined to require a one-foot cover to verify the extent of the cover limits. 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 for the use of the site as set forth in 6 NYCRR Part 375-6.7(d). Substitution of other materials and components may be allowed where such components already exist or are a component of the tangible property to be placed as part of site redevelopment. Such components may include, but are not necessarily

limited to: pavement, concrete, paved surface parking areas, sidewalks, building foundations and building slabs.

5. Engineering and Institutional Controls

Imposition of an institutional control in the form of an Environmental Easement and a Site Management Plan, as described below, will be required. The remedy will achieve a Track 4 commercial and industrial cleanup at a minimum.

Institutional Control

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

- require the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
- allow the use and development of the controlled property for commercial use on the 1.7-acre portion of the site that includes the Trail and the area below the elevated portion of the Trail spanning the northwestern corner of the site that was previously remediated; and industrial use on the remainder of the site as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- restrict the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or the Onondaga County Health Department; and
- require compliance with the NYSDEC approved Site Management Plan.

6. 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 remedy element 5 above.

Engineering Controls: The cover system discussed in remedy element 4 and the secured fencing discussed in remedy element 2.

This plan includes, but may not be limited to:

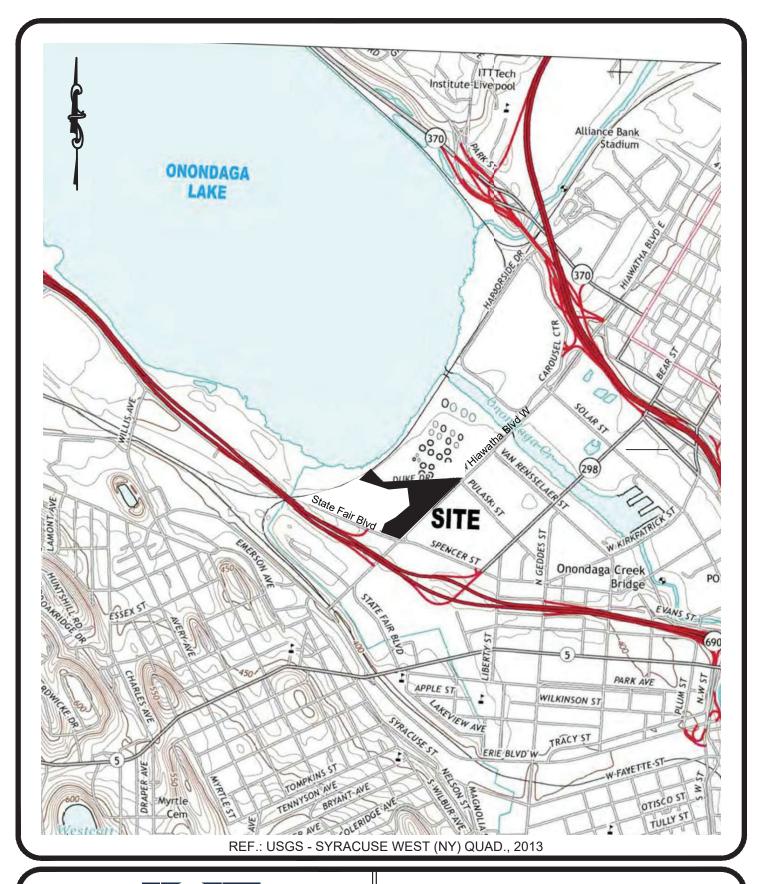
- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- a provision for further investigation and remediation should large scale redevelopment occur, or if the subsurface is otherwise made accessible. The nature and extent of contamination in areas where access was previously limited or unavailable will be immediately and thoroughly investigated pursuant to a plan approved by the NYSDEC. Based on the investigation results and

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the NYSDEC determination of the need for a remedy, a Remedial Action Work Plan (RAWP) will be developed for the final remedy for the site, including removal and/or treatment of any source areas to the extent feasible. Citizen Participation Plan (CPP) activities will continue through this process. Any necessary remediation will be completed prior to, or in association with, redevelopment;

- a provision should redevelopment occur to ensure no soil exceeding protection of groundwater concentrations will remain below storm water retention basin or infiltration structures:
- 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 occupied buildings on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
- provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in remedy element 4 above will be placed in any areas where the upper one foot of exposed surface soil exceeds the applicable soil cleanup objectives (SCOs):
- provisions for the management and inspection of the identified engineering controls;
- maintaining site access controls and NYSDEC notification; and
- the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.





Site Location Map 800 Hiawatha Boulevard Site Syracuse, New York

CITY OF SYRACUSE ONONDAGA CO., NY

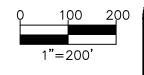
PROJ. #: 16140 | DATE: 06/08/2021 | SCALE: NTS | DWG. NO. RIR | FIGURE 1



APPROXIMATE PROPERTY BOUNDARY
ELEVATED PORTION OF WALKING TRAIL
GROUND LEVEL PORTION OF WALKING TRAIL
BCP BOUNDARY

OU1

OU2



Note: The buildings were removed in 2018. Only slabs remain. 19 British American Blvd., Latham, New York 1211

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Aerial Site Map **800 Hiawatha Blvd**

Syracuse, New York

ONONDAGA CO., NY

PROJ. No.:

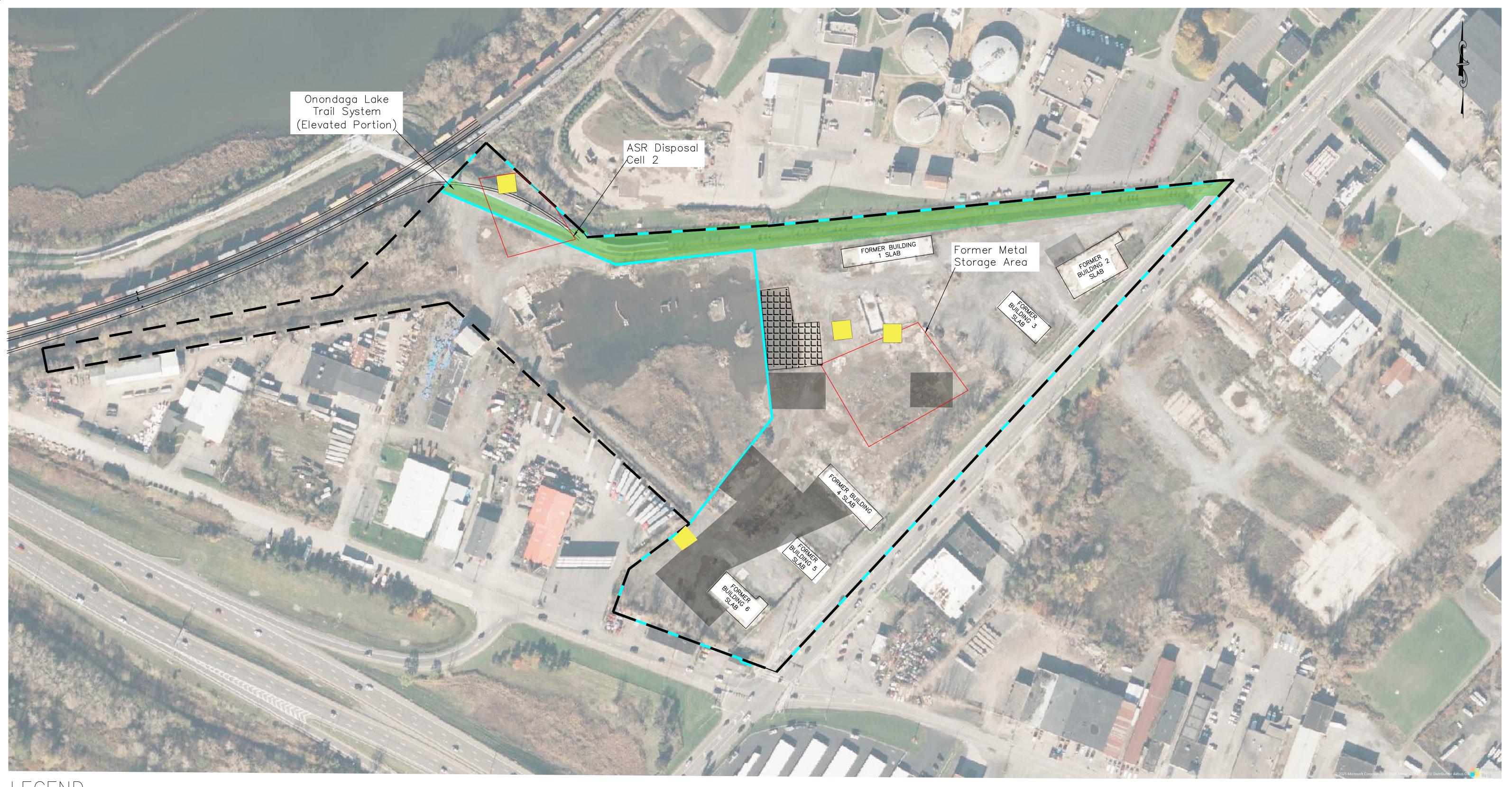
16140 DATE:

4/19/2023 SCALE:

1"=200' DWG. NO.

CITY OF SYRACUSE

ONONDAGA CO., NY
RIR FIGURE 2



LEGEND

---- PROPERTY BOUNDARY

BCP BOUNDARY

OU-2 REMEDIATED AREA

PROPOSED SOIL CAP - 1FT THICK (INDUSTRIAL USE)

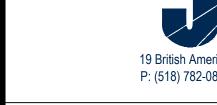
EXISTING CONCRETE

PROPOSED PCB EXCAVATION AREAS

NOTE: Extent of soil cap is approximate. Final limits will be determined subsequent to predesign investigation.

NOTE:

- 1. The buildings were removed in 2018. Only slabs remain.
- 2. Extent of soil cap is approximate. Final limits will be determined subsequent to pre—design investigation.





PRELIMINARY REMEDIATION AREAS

800 Hiawatha Blvd

Syracuse, New York
SYRACUSE ONOR

CITY OF SYRACUSE ONONDAGA CO., NY

OJ. No.: 16140 DATE: 10/14/2025 SCALE: 1"=100' DWG. NO. ----- FIGURE