

**Site Management Plan
1915 Erie Boulevard East
City of Syracuse, NY
BCA Site #C00333-7**

1. Overview and Objectives

The site is a 1.1-acre, vacant commercial property currently owned by 1915 Erie Boulevard East, LLC. The location of the property is shown on Figure 1-1. The site has been characterized during several previous investigations. The user should refer to the previous investigation reports for more detail, as needed.

The objective of this Site Management Plan (SMP) is to set guidelines for management of soil material during any future activities which would breach the cover system at the site and future use of groundwater. This SMP addresses environmental concerns related to the soil and groundwater management and has been reviewed and approved by the New York State Department of Environmental Conservation (NYSDEC).

2. Nature and Extent of Contamination

Based on data obtained from previous investigations and the remediation done at the site, a Final Remedial Action Report (January 2004) was developed by S&W Redevelopment of North America, LLC (SWRNA). The remediation activities were completed in accordance with the Remedial Action Work Plan approved by the NYSDEC.

As a result of the remedial activities the sources of impacts (USTs and impacted soils) have been removed. Impacts related to the former USTs may occur in isolated areas of excavation at depths greater than 12 feet below ground surface. Groundwater impacts were detected in samples taken from monitoring well MW-8, adjacent to the former UST area, with decreasing concentration in samples taken from downgradient wells MW-7 and MW-5. It is anticipated that Volatile Organic Compounds (VOC) concentrations in groundwater will continue to decrease over time due to the removal of the source of impacts and natural degradation.

Surface soils with staining and visible impacts were removed as part of the remedial activities. Several Semi-Volatile Organic Compounds (SVOCs) were detected in confirmatory samples and surface soil samples with no well-defined distribution or association with discreet sources. The SVOCs detected in soil samples do not have a significant impact on groundwater quality based on site groundwater monitoring results. The SVOCs that remain in soils could be a potential human exposure concern, however, the institutional controls, maintenance of a barrier as described in section 5 of this SMP and groundwater use restriction, will provide a remedy to minimize potential human exposure.

3. Contemplated Use

As part of the redevelopment project, the property has been identified for office, commercial, and light industrial uses. Specific uses for this zoning category are as follows; residential uses are not allowed in this category; commercial and industrial uses are allowed, but require engineering controls and/or institutional controls.

4. Groundwater Use

The use of groundwater underlying the property is prohibited without treatment to render it safe for use as drinking water or industrial purposes and the user must first obtain approval from the NYSDEC.

5. Purpose and Description of Surface Cover System

The purpose of the surface cover system is to eliminate the potential for human contact with fill material. The cover system will consist of one of the following types of clean material:

- **Soil:** The existing 12 inches of soil cover must be maintained or in those areas where the existing soil cover is removed, a minimum of 12 inches of vegetated clean soil cover underlain by a demarcation layer, in outdoor vegetated areas. The demarcation layer will consist of a separation geotextile or other material of similar specification and manufacture. An alternative material may be used upon approval by the NYSDEC.
- **Asphalt:** a minimum of 6 inches of material (asphalt and subbase material) in areas that will become roads, sidewalks and parking lots.
- **Concrete:** a minimum of 6 inches of material (concrete and subbase material) in areas that will become slab-on-grade structures or for roads, sidewalks and parking lots in lieu of asphalt. For slab-on-grade structures, an 8-mil polyethylene vapor barrier will be placed beneath the concrete.

6. Management of Soils/Fill and Long Term Maintenance of Cover System

The purpose of this section is to provide environmental guidelines for management of subsurface soils/fill and the long-term management of the cover system during any future intrusive work which breaches the cover system.

The SMP includes the following conditions:

- Any breach of the cover system, including for the purposes of construction or utilities work, must be replaced or repaired using an acceptable borrow source free of industrial and/or other potential sources of chemical or petroleum contamination. The repaired area must be covered with clean

soil underlain by demarcation layer and reseeded or covered with impervious product such as concrete or asphalt, as described in Section 4, to prevent erosion in the future.

- Control of surface erosion and run-off of the entire property at all times, including during construction activities. This includes proper maintenance of the vegetative cover established on this property.
- Site soil that is excavated and is intended to be removed from the property must be managed, characterized, and properly disposed of in accordance with NYSDEC regulations and directives.
- Soil excavated at the site may be reused as backfill material on-site provided it contains no visual or olfactory evidence of contamination, and it is placed beneath a cover system component as described in Section 4.
- Any off-site fill material brought to the site for filling and grading purposes shall be from an acceptable borrow source free of industrial and/or other potential sources of chemical or petroleum contamination. If directed by NYSDEC staff, off-site borrow sources shall be subject to collection of one representative composite sample per source. Such sample shall be analyzed for TCL VOCs, SVOCs, pesticides, PCBs, arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver and cyanide. The soil will be acceptable for use as cover material provided that all parameters meet the NYSDEC recommended soil cleanup objectives included in Technical and Administrative Guidance Memo 4046 (TAGM 4046).
- Prior to any construction activities, workers are to be notified of the site conditions with clear instructions regarding how the work is to proceed. Invasive work performed at the property will be performed in accordance with all applicable local, state, and federal regulations to protect worker health and safety.
- The Owner shall complete and submit to the Department an annual report by January 15th of each year. Such annual report shall contain certification that the institutional controls put in place, pursuant to the Environmental Easement, are still in place, have not been altered and are still effective; that the remedy and protective cover have been maintained; and that the conditions at the site are fully protective of public health and the environment.

If the cover system has been breached during the year covered by that Annual Report, the owner of the property shall include the following in that annual report:

- A certification that all work was performed in conformance with this SMP.

In addition, deed restrictions have been implemented in accordance with the requirements of the New York State Brownfield Cleanup Program, limiting future use of the property to business, commercial, or industrial development.

6.1 Subgrade Material

Subgrade material used to backfill excavations or placed to increase site grades or elevation shall meet the following criteria.

- Excavated on-site soil/fill which appears to be visually impacted shall be sampled and analyzed. If analytical results indicate that the contaminants, if any, are present at concentrations below TAGM 4046, the soil/fill can be used as backfill on-site.
- Any off-site fill material brought to the site for filling and grading purposes shall be from an acceptable borrow source free of industrial and/or other potential sources of chemical or petroleum contamination.
- Off-site soils intended for use as site backfill cannot otherwise be defined as a solid waste in accordance with 6 NYCRR Part 360-1.2(a).
- If the contractor designates a sources as "virgin" soil, it shall be further documented in writing to be native soil material from areas not having supported any known prior industrial or commercial development or agricultural use.
- If directed by NYSDEC staff, virgin soils shall be subject to collection of one representative composite sample per source. Such sample shall be analyzed for TCL VOCs, SVOCs, pesticides, PCBs, arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver, and cyanide. The soil will be acceptable for use as backfill provided that all parameters meet the TAGM 4046 guidance.
- Non-virgin soils will be tested via collection of one composite sample per 500 cubic yards of material from each source area. If more than 1,000 cubic yards of soil are borrowed from a given off-site non-virgin soil source area and both samples of the first 1,000 cubic yards meet TAGM 4046 guidance, the sample collection frequency will be reduced to one composite for every 2,500 cubic yards of additional soils from the same source, up to 5,000 cubic yards, sampling frequency may be reduced to one sample per 5,000 cubic yards, provided all earlier samples met the TAGM 4046 guidance.