# **DECISION DOCUMENT**

The Lofts at 1117 Brownfield Cleanup Program Syracuse, Onondaga County Site No. C734160 November 2024



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

# **DECLARATION STATEMENT - DECISION DOCUMENT**

The Lofts at 1117 Brownfield Cleanup Program Syracuse, Onondaga County Site No. C734160 November 2024

#### **Statement of Purpose and Basis**

This document presents the remedy for the The Lofts at 1117 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 The Lofts at 1117 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 gases and other emissions;
- Increasing energy efficiency and minimizing use of non-renewable energy;
- Conserving and efficiently managing resources and materials;

• Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;

• Maximizing habitat value and creating habitat when possible;

• Fostering green and healthy communities and working landscapes which balance ecological, economic and social goals;

• 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

a minimum, to meet the 2020 Energy Conservation Construction Code of New York (or the 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<sup>(TM)</sup> (available in the Sustainable Remediation Forum [SURF] library) or similar NYSDEC accepted tool. Water consumption, greenhouse gas emissions, renewable and non-renewable 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 contaminated source areas adjacent to the building, including soils which exceed the restricted residential soil cleanup objectives (RRSCOs), as defined by 6 NYCRR Part 375-6.8.

Lead contaminated soil, located in the center of the site, will be removed from an approximate 144 square foot area and down to a maximum depth of approximately five feet below ground surface (bgs). Mercury contaminated soil, located primarily in two areas in the eastern portion of the site, will be removed from an approximate 500 square foot and 1,080 square foot area down to a maximum depth of approximately 12 feet bgs. Lead and mercury soil removal areas are shown on Figure 2 (Remedial Excavations). These three areas contain soils which exceed the RRSCOs that will be excavated and transported off-site for disposal to allow for placement of the cover system noted in paragraph 4 below.

In total, approximately 340 cubic yards of contaminated soil will be excavated and transported offsite for disposal. Collection and analysis of end point samples at the remedial excavation depth and lateral excavation limits will be used to verify that soil cleanup objectives (SCOs) for the site have been achieved. If end point sampling indicates that SCOs were not achieved at the stated remedial limits, the Applicant must notify DEC, submit the sample results, and in consultation with DEC, determine if further remedial excavation is necessary. Further excavation for development, limited to utility trenching and grading, will proceed after confirmation samples demonstrate that SCOs for the site 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 the above excavation criteria may be used below the cover system described in paragraph 4 to backfill the excavation. Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to replace excavated soil or complete backfilling of excavations and establish the designed grades at the site.

# 4. Cover System

A cover system will be required site-wide for areas where the upper two feet of soil will exceed the applicable SCOs, to allow for future restricted residential use of the site. Where a soil cover is to be used it will be a minimum of two feet 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. Institutional Control

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 restricted residential cleanup at a minimum.

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 restricted residential use, commercial use, or industrial use 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 County DOH; 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 paragraph 5 above.
- Engineering Controls: The Cover System discussed in paragraph 4 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 occupied buildings on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;

• a provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in paragraph 4 above will be placed in any areas where the upper two feet of exposed surface soil exceed the applicable 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.

b. A Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:

- a schedule of monitoring and frequency of submittals to the NYSDEC;
- monitoring for vapor intrusion for any buildings on the site, as may be required by the Institutional and Engineering Control Plan discussed above.

## **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.

# November 25, 2024

Date

Jason Pelton, Director Remedial Bureau D

# **DECISION DOCUMENT**

The Lofts at 1117 Syracuse, Onondaga County Site No. C734160 October 2024

#### 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 repository:

DECInfo Locator - Web Application https://extapps.dec.ny.gov/data/DecDocs/C734160/

Hazard Branch Library Attn: Lauren Cox 1620 West Genesee Street Syracuse, NY 13204 Phone: (315) 435-5326

## **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 <u>http://www.dec.ny.gov/chemical/61092.html</u>

# SECTION 3: SITE DESCRIPTION AND HISTORY

Location: The Lofts at 1117 site (site) is a 0.46-acre property located in the Syracuse Westside community. The site is bounded to the north by West Fayette Street, to the south by a shopping plaza, to the east by a multi-tenant commercial building, and to the west by a parking lot (see Figure 1).

Site Features: The site is relatively flat and contains two buildings connected by a second-story bridge. Both buildings were constructed in approximately 1900. Each building is three stories high and consist of brick-and-mortar construction. The total combined building space is approximately 29,063 square feet and both buildings are currently vacant. A drum and tank storage room is located in the southwestern corner of the southern building. The storage room contained several 5-gallon and 55-gallon drums as well as a bulk storage tank of heating oil. The remainder of the site consists primarily of asphalt pavement.

Current Zoning and Land Use: The site and all adjoining sites are currently in a Class A Industrial District. The properties surrounding the site are currently used for commercial purposes and the site is currently vacant.

Past Use of the Site: The site was originally developed for industrial purposes in 1900. Historical site uses include manure spreader manufacturing, gear manufacturing, hat manufacturing, toy manufacturing, screw-type machining, printing, and painting. Two historic spills occurred directly in front of the site along Fayette Street. Both spills were associated with vehicle crashes into nearby transformer poles and both spills were properly closed.

Site Geology and Hydrogeology: The site is approximately 395 feet above mean sea level. The depth to groundwater ranges between 8 and 14 feet bgs and generally flows north-northwest towards Harbor Brook located approximately 250 feet from the site. The site contains historic fill material across a significant portion of the site from grade to a maximum depth of 9.5 feet bgs. Native soil located beneath the fill consists of fine silty clay and fine silty sand down to 12 feet bgs. It is then followed by a medium to coarse sand. Bedrock was not encountered at the soil depths sampled down to 20 feet.

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 this site, alternatives that restrict the use of the site to restricted residential use (which allows for commercial use and 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.

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 Applicants under the Brownfield Cleanup Agreement are Volunteers. The Applicants 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: <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 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
- indoor air
- sub-slab soil vapor

- 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 see: <a href="http://www.dec.ny.gov/regulations/61794.html">http://www.dec.ny.gov/regulations/61794.html</a>

# 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 contaminants of concern identified at this site are:

benzo(a)anthracene	cyanides (soluble cyanide salts)
benzo(a)pyrene	mercury
benzo(b)fluoranthene	lead
chrysene	arsenic
dibenz[a,h]anthracene	copper
indeno(1,2,3-cd)pyrene	barium
benzo(k)fluoranthene	perfluorooctanoic acid
cadmium	Perfluorooctanesulfonic acid
mercury	carbon tetrachloride

The contaminants of concern exceed the applicable SCGs for:

- groundwater
- soil

# 6.2: Interim Remedial Measures

An interim remedial measure (IRM) is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before issuance of the Decision Document.

There were no IRMs performed at this site during the RI.

# 6.3: <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.

Nature and Extent of Contamination:

Soil and groundwater were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, polychlorinated biphenyls (PCBs), per- and polyfluoroalkyl substances (PFAS), and pesticides. Sub-slab soil vapor, indoor air, and outdoor air samples were analyzed for VOCs. Based upon investigations conducted to date, the primary contaminants of concern include SVOCs and metals in soil and SVOCs and PFAS in groundwater.

Soils: SVOCs detected at concentrations exceeding the protection of groundwater soil cleanup objectives (PGSCOs) occurred in four surface soil samples and four subsurface samples throughout the site and included: benzo(a)anthracene at a maximum concentration of 17 parts per million (ppm) (PGSCO 1.0 ppm), benzo(a)pyrene at a maximum concentration of 17 ppm (PGSCO 22 ppm), benzo(b)fluoranthene at a maximum concentration of 19 ppm (PGSCO 1.7 ppm), benzo(k)fluoranthene at a maximum concentration of 5.8 ppm (PGSCO 1.7 ppm), Chrysene at a maximum concentration of 16 ppm (PGSCO 1.0 ppm), and Indeno(1,2,3-cd)pyrene at a maximum concentration of 8.4 ppm (PGSCO 8.2 ppm)

One SVOC, dibenzo(a,h)anthracene was detected in five samples a concentration exceeding Restricted Residential Soil cleanup objectives (RRSCOs) with a maximum concentration of 2.4 ppm (RRSCO 0.33 ppm).

Perflurorooctanoic acid (PFOA) was detected in one soil sample above PGSCOs with a maximum concentration of 0.983 parts per billion (ppb) compared to the PGSCO of 0.8 ppb. Perfluorooctanesulfonic acid (PFOS) was not detected in concentrations exceeding the PGSCO.

Several metals were detected at concentrations exceeding RRSCOs in four surface and 29 subsurface soils throughout the site, most notably mercury in the eastern portion of the site with a maximum concentration of 16.4 ppm (RRSCO 0.81 ppm). Lead was found in concentrations exceeding RRSCOs at a maximum concentration of 4,720 ppm (RRSCO 400 ppm). Other metals found at concentrations exceeding RRSCOs include: arsenic at a maximum concentration of 18.7 ppm (RRSCO 16 ppm), barium at a maximum concentration of 538 ppm (RRSCO 400 ppm), cadmium at a maximum concentration of 10.5 ppm (RRSCO 4.3 ppm), copper at a maximum concentration of 446 ppm (RRSCO 270 ppm), and cyanide at a maximum concentration of 140 ppm (RRSCO 27 ppm).

There were no VOCs, PCBs, or pesticides detected in soil at concentrations exceeding applicable SCOs.

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

Groundwater: Groundwater sample results were compared to the NYS Ambient Water Quality Standards and Guidance Values (groundwater SCGs). No VOCs were detected at concentrations exceeding groundwater SCGs.

SVOCs exceeding groundwater SCGs occurred in five out of six groundwater monitoring wells across the site including benzo(a)anthracene at a maximum concentration of 0.08 ppb (groundwater SCG 0.002 ppb), benzo(a)pyrene at a maximum concentration of 0.13 ppb (groundwater SCG ND), benzo(b)fluoranthene at a maximum concentration of 0.08 (groundwater SCG 0.002 ppb), benzo(k)fluoranthene at a maximum concentration of 0.03 ppb (groundwater SCG 0.002 ppb), benzo(k)fluoranthene at a maximum concentration of 0.03 ppb (groundwater SCG 0.002 ppb), chrysene at a maximum concentration of 0.07 ppb (groundwater SCG 0.002 ppb), and Indeno(1,2,3-cd)pyrene at a maximum concentration of 0.1 ppb (groundwater SCG 0.002 ppb).

PFOA was detected in two out of six groundwater monitoring wells at concentrations above New York State's ambient water quality (AWQ) guidance values with a maximum detection of 43.8 parts per trillion (ppt) (AWQ SCG 6.7 ppt). PFOS was detected in one out of six groundwater monitoring wells at concentrations above New York State's guidance values with a maximum detection of 7.67 ppt (AWQ SCG 2.7 ppt).

No VOCs, metals, pesticides, or PCBs were detected at concentrations above groundwater SCGs.

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

Sub-slab Vapor and Indoor Air: Several chlorinated solvents were detected in the sub-slab vapor, most notably carbon tetrachloride at concentrations up to 6.86  $\mu$ g/m<sup>3</sup>. Various petroleum VOCs were detected in the sub-slab vapor, most notably ethanol at concentrations up to 75.1  $\mu$ g/m<sup>3</sup>. Several chlorinated solvents were detected in the indoor air samples, most notably methylene chloride at concentrations up to 5.35  $\mu$ g/m<sup>3</sup> which was also detected in outdoor air at concentrations up to 3.96  $\mu$ g/m<sup>3</sup>. Petroleum-related VOCs were detected in the indoor air, including toluene at concentrations up to 1.85  $\mu$ g/m<sup>3</sup>.

Data does not indicate any off-site impacts in soil vapor related to this site.

# 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 vacant therefore, people are not expected to come into contact with site related soil and groundwater contamination unless they dig below the surface. 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. Because the site is vacant, the inhalation of site-related contaminants due to soil vapor intrusion does not represent a current

concern. Furthermore, environmental sampling indicates soil vapor intrusion is not a concern for off-site buildings.

# 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:

## <u>Groundwater</u>

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#### **RAOs for Public Health Protection**

Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards.

#### **RAOs for Environmental Protection**

• Restore groundwater aquifer to pre-disposal/pre-release conditions, to the extent practicable.

#### <u>Soil</u>

#### **RAOs for Public Health Protection**

Prevent ingestion/direct contact with contaminated soil.

## **RAOs for Environmental Protection**

• Prevent migration of contaminants that would result in groundwater or surface water contamination.

#### <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 residential cleanup.

The selected remedy is referred to as the excavation and cover system remedy.

The elements of the selected remedy, as shown in Figures 2 and 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 gases and other emissions;

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

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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.

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• 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;

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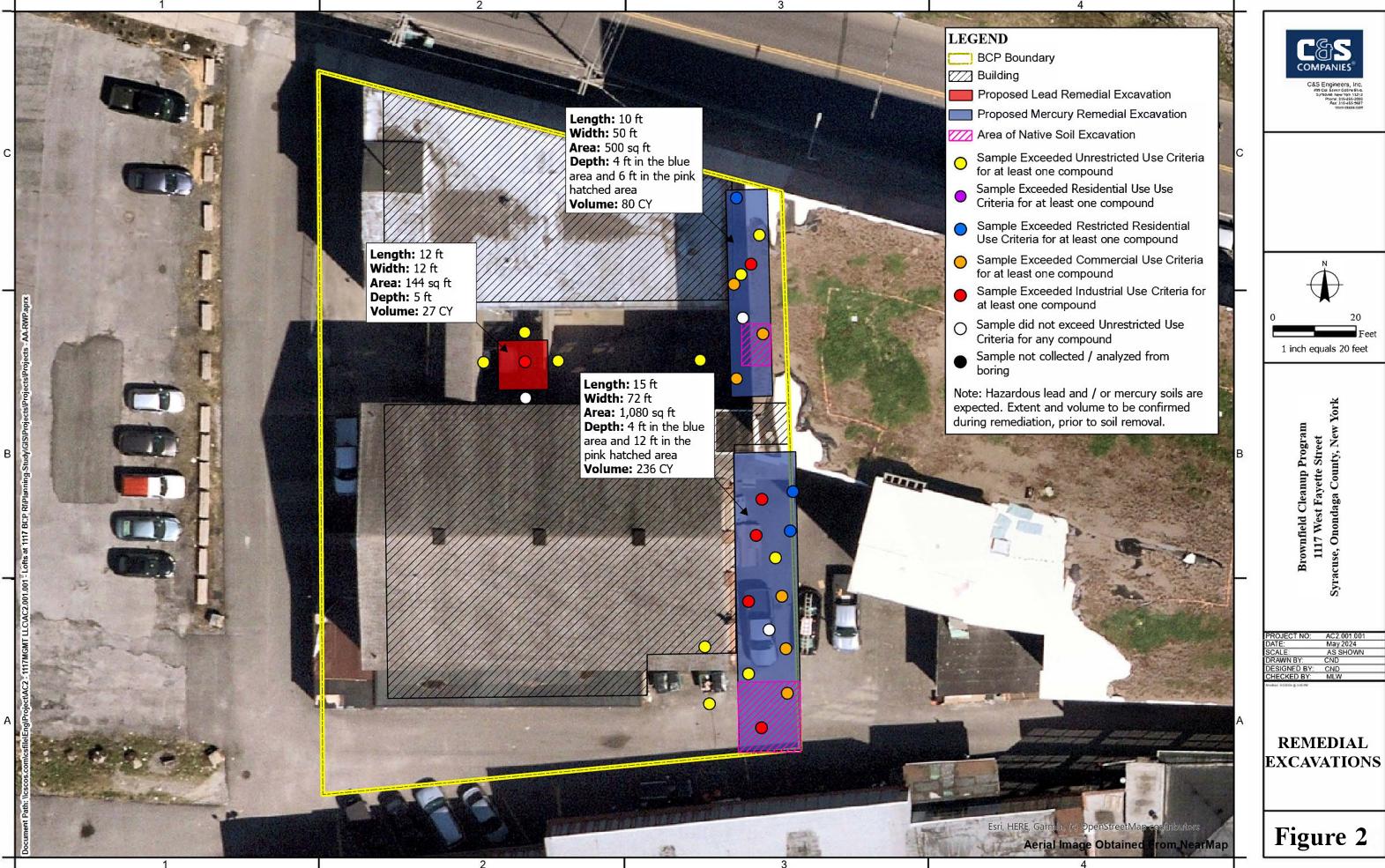
- provisions for the management and inspection of the identified engineering controls;
- maintaining site access controls and NYSDEC notification; and

• the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.

b. A Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:

- a schedule of monitoring and frequency of submittals to the NYSDEC;
- monitoring for vapor intrusion for any buildings on the site, as may be required by the Institutional and Engineering Control Plan discussed above.









2

Note: Historic fill soil remains below the cover system.

