NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau E 625 Broadway, 12th Floor, Albany, NY 12233-7017 P: (518) 402-9813 I F: (518) 402-9819 www.dec.ny.gov

March 27, 2019

Mr. Thomas J. Quatroche, Jr. 1827 Fillmore LLC 424 Main Street, Suite 2000 Buffalo, New York 14202 tquatroc@ecmc.edu

RE: 1827 Fillmore Avenue

Site ID No. C915279 City of Buffalo, Erie County Remedial Work Plan & Decision Document

Dear Mr. Quatroche:

The New York State Department of Environmental Conservation (Department) and the New York State Department of Health (NYSDOH) have reviewed the Remedial Work Plan (RWP), a.k.a. the Remedial Investigation/Alternatives Analysis Report, for the 1827 Fillmore Avenue site, dated January 2019 and prepared by Benchmark Environmental Engineering & Science, PLLC on behalf of 1827 Fillmore LLC. The RWP is hereby approved. Please ensure that a copy of the approved RWP is placed in the document repository. The draft plan should be removed.

Enclosed is a copy of the Department's Decision Document for the site. The remedy is to be implemented in accordance with this Decision Document. Please ensure that a copy of the Decision Document is placed in the document repository.

Please contact the Department's Project Manager, David Locey, at (716) 851-7220 or <u>david.locey@dec.ny.gov</u> at your earliest convenience to discuss next steps. Please recall the Department requires seven (7) days prior notice to the start of field work.

Sincerely,

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Michael J. Cruden, P.E. Director Remedial Bureau E Division of Environmental Remediation



Enclosure

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DECISION DOCUMENT

1827 Fillmore Avenue Brownfield Cleanup Program Buffalo, Erie County Site No. C915279 March 2019



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

DECLARATION STATEMENT - DECISION DOCUMENT

1827 Fillmore Avenue Brownfield Cleanup Program Buffalo, Erie County Site No. C915279 March 2019

Statement of Purpose and Basis

This document presents the remedy for the 1827 Fillmore Avenue site, a brownfield cleanup site. The remedial program was chosen in accordance with the New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR) Part 375.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the 1827 Fillmore Avenue site and the public's input to the proposed remedy presented by the Department.

Description of Selected Remedy

The elements of the selected remedy are as follows:

1. 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; and

• Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.

2. Excavation

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

- soil exceeding the site-specific action level of 3,900 ppm of lead; and
- soil containing total SVOCs exceeding 500 ppm.

Approximately 4,200 tons of contaminated soil will be removed from the site and treated prior to disposal using chemical stabilization, if necessary.

3. Backfill

On-site soil which does not exceed the above excavation criteria may be used below the cover system described in remedy element 4 below, 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 if necessary, to complete the backfilling of the excavation and establish the designed grades at the site.

4. Cover System

A site cover will be required to allow for commercial use of the site in areas where the upper one foot of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). 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. In-Situ Stabilization

In-situ stabilization (ISS) of soil exceeding the 6 NYCRR Part 371 hazardous criteria for lead, will be implemented in remedial areas TP-13 and SB-21, depicted in Figure 2. ISS is a process that uses a stabilizing agent which chemically changes contamination to make it less soluble. The contaminated soil will be mixed in place with stabilizing agents using an excavator or augers. The stabilized soil will then be covered with a cover system as described in remedy element 4 above, to prevent direct exposure. This treatment changes the contamination from a soluble form to a stable, insoluble compound to reduce or eliminate the matrix as a source of groundwater contamination.

6. 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 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 Department approved Site Management Plan.

7. Site Management Plan

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

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

• Institutional Controls: the Environmental Easement discussed in remedy element 6 above; and

• Engineering Controls: the site cover system, discussed in remedy element 4 and the stabilized soil discussed in remedy element 5 above.

b. This plan also 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 water use restrictions;

• a provision that should a building foundation, building slab or pavement 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 Department notification; and

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

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

• monitoring of groundwater to assess the performance and effectiveness of the remedy; and

• a schedule of monitoring and frequency of submittals to the Department.

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.

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03/27/2019

Date

Michael Cruden, Director Remedial Bureau E

DECISION DOCUMENT

1827 Fillmore Avenue Buffalo, Erie County Site No. C915279 March 2019

SECTION 1: <u>SUMMARY AND PURPOSE</u>

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), has selected a remedy for the above referenced site. The disposal of contaminants at the site has resulted in threats to public health and the environment that would be addressed by the remedy. The disposal or release of contaminants at this site, as more fully described in this document, has contaminated various environmental media. Contaminants include hazardous waste and/or petroleum.

The New York State Brownfield Cleanup Program (BCP) is a voluntary program. The goal of the BCP is to enhance private-sector cleanups of brownfields and to reduce development pressure on "greenfields." A brownfield site is real property, the redevelopment or reuse of which may be complicated by the presence or potential presence of a contaminant.

The Department has issued this document in accordance with the requirements of New York State Environmental Conservation Law and 6 NYCRR Part 375. This document is a summary of the information that can be found in the site-related reports and documents.

SECTION 2: <u>CITIZEN PARTICIPATION</u>

The Department seeks input from the community on all remedies. A public comment period was held, during which the public was encouraged to submit comment on the proposed remedy. All comments on the remedy received during the comment period were considered by the Department in selecting a remedy for the site. Site-related reports and documents were made available for review by the public at the following document repository:

Buffalo & Erie County Public Library Attn: April Tompkins 1 Lafayette Square Buffalo, NY 14203 Phone: (716) 858-8900

Receive Site Citizen Participation Information By Email

Please note that the Department's Division of Environmental Remediation (DER) is "going paperless" relative to citizen participation information. The ultimate goal is to distribute citizen participation information about contaminated sites electronically by way of county email

listservs. Information will be distributed for all sites that are being investigated and cleaned up in a particular county under the State Superfund Program, Environmental Restoration Program, Brownfield Cleanup Program and Resource Conservation and Recovery Act Program. We encourage the public to sign up for one or more county listservs at http://www.dec.nv.gov/chemical/61092.html

SECTION 3: SITE DESCRIPTION AND HISTORY

Site Location:

The site is in an urban area within the City of Buffalo and is bound by the Kensington Expressway (Route 33) and Buffalo Public School #84 to the north, Erie County Medical Center (ECMC) to the east, Buffalo Public School #89 to the south and Fillmore Avenue to the west.

Site Features:

The site is currently vacant land with green areas, asphalt-paved parking lots and roadways. The entire site is enclosed by fence.

Current Zoning and Land Use:

The site is in one of Buffalo's District Zones (D-C Flex Commercial) which will allow for its proposed redevelopment and use as a parking lot. The site is currently vacant.

Past Use of the Site:

From at least 1917 the site was a stone quarry; the quarry encompassed the entire site and portions of the adjacent properties to the east and to the south. Between the 1940s and the 1950s, the stone quarry was backfilled with sand, gravel, cinders, ash, asphalt, broken concrete, brick, metal debris, wood, glass and ceramics.

In 1958, the Kensington Heights Towers complex was constructed on-site, consisting of six, seven-story brick apartment buildings, open space, and on-site parking.

The site has been vacant since the 1980s. From 2009 to 2014, asbestos was removed from the apartment buildings and by 2018, all six buildings had been demolished.

The site contamination is largely attributed to the waste fill materials used to backfill the stone quarry.

Site Geology and Hydrogeology:

The fill materials extend from the surface to the top of bedrock, varying in depths from 3 to 24 feet. Two soil mounds are located on-site, consisting mainly of topsoil, sandy clay and minimal fill.

Groundwater was encountered within the fill material in the central and eastern portions of the site, at depths of approximately 14 to 18 feet, typically within a layer of ash.

No groundwater was encountered within the fill in the western portion of the site. Bedrock wells installed in the western portion of the site found groundwater at depths of approximately 20 feet.

Groundwater flows in a westerly direction.

A site location map is attached as Figure 1.

SECTION 4: LAND USE AND PHYSICAL SETTING

The Department may consider the current, intended, and reasonably anticipated future land use of the site and its surroundings when evaluating a remedy for soil remediation. For this site, alternatives (or an alternative) that restrict(s) the use of the site to commercial use (which allows for industrial use) as described in Part 375-1.8(g) were/was evaluated in addition to an alternative which would allow for unrestricted use of the site.

A comparison of the results of the Remedial Investigation (RI) to the appropriate standards, criteria and guidance values (SCGs) for the identified land use and the unrestricted use SCGs for the site contaminants is available in the RI Report.

SECTION 5: ENFORCEMENT STATUS

The Applicant(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, the Department 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(s) identified. If other natural resources are present, such as surface water bodies or wetlands, the water and sediment may be sampled as well. Based on the presence of contamination. Data collected in the RI influence the development of remedial alternatives. The RI report is available for review in the site document repository and the results are summarized in section 6.3.

The analytical data collected on this site includes data for:

- groundwater
- soil

6.1.1: Standards, Criteria, and Guidance (SCGs)

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

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

6.1.2: <u>RI Results</u>

The data have identified contaminants of concern. A "contaminant of concern" is a contaminant that is sufficiently present in frequency and concentration in the environment to require evaluation for remedial action. Not all contaminants identified on the property are contaminants of concern. The nature and extent of contamination and environmental media requiring action are summarized below. Additionally, the RI Report contains a full discussion of the data. The contaminant(s) of concern identified at this site is/are:

benzo(a)anthracene	barium
benzo(a)pyrene	cadmium
benzo(b)fluoranthene	copper
dibenz[a,h]anthracene	lead
indeno(1,2,3-CD)pyrene	mercury
arsenic	

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

Surface Soil/Fill

Samples were collected from the top two inches of soil/fill, across the site. Samples were tested for semi-volatile organic compounds (SVOCs), metals, polychlorinated biphenyls (PCBs), pesticides and herbicides.

In nearly every sample, one or more SVOCs was reported at a concentration exceeding its commercial soil cleanup objective (CSCO) for the anticipated commercial use of the property. The SVOCs reported were:

Benzo(a)anthracene (up to 66 parts per million (ppm), CSCO 5.6 ppm); Benzo(a)pyrene (up to 51 ppm, CSCO 1 ppm); Benzo(b)fluoranthene (up to 63 ppm, CSCO 5.6 ppm); Dibenzo(a,h)anthracene (up to 5.4 ppm, CSCO 0.56 ppm); and Indeno(1,2,3-cd)pyrene (up to 30 ppm, CSCO 5.6 ppm).

Metals, PCBs, pesticides and herbicides were either not detected or were reported at concentrations below CSCOs.

Subsurface Soil/Fill

Samples were collected from varying depths across the site and tested for volatile organic compounds (VOCs), SVOCs, metals, polychlorinated biphenyls (PCBs), pesticides and herbicides.

The same SVOCs reported at concentrations exceeding CSCOs in the surface samples were also reported in the subsurface, but in significantly fewer samples. The SVOCs reported were: Benzo(a)anthracene (up to 65 ppm, CSCO 5.6 ppm); Benzo(a)pyrene (up to 50 ppm, CSCO 1 ppm); Benzo(b)fluoranthene (up to 60 ppm, CSCO 5.6 ppm); Dibenzo(a,h)anthracene (up to 9.7 ppm, CSCO 0.56 ppm); and Indeno(1,2,3-cd)pyrene (up to 27 ppm, CSCO 5.6 ppm).

Metals reported at concentrations exceeding CSCOs included: Arsenic (up to 73 ppm, CSCO 16 ppm); Barium (up to 977 ppm, CSCO 400 ppm); Cadmium (up to 82.3 ppm, CSCO 9.3 ppm) Copper (up to 682 ppm, CSCO 270 ppm); Lead (up to 21,800 ppm, CSCO 1,000 ppm); and Mercury (3 ppm, CSCO 2.8 ppm).

VOCs, PCBs, pesticides and herbicides were either not detected or were reported at concentrations below CSCOs.

Due to the elevated levels of lead reported, subsurface samples collected from across the site and from varying depths, were submitted for Toxicity Characteristic Leachate Procedure (TCLP) analysis. TCLP lead was reported at concentrations of up to 13.5 ppm, exceeding the 5 ppm threshold, which defines the material as a characteristic hazardous waste, in two areas of the site.

The distribution of contaminant concentrations in soil do not indicate off-site impacts to soil attributable to contaminant migration from the site.

Groundwater

Samples were tested for VOCs, SVOCs, metals, polychlorinated biphenyls (PCBs), pesticides herbicides, per/polyfluorinated alkyl substances (PFAS) and 1,4 dioxane.

Only one VOC was reported at a concentration above its groundwater quality standard (GWQS), and in just one sample; 4-isoproplyene was reported at 9.3 parts per billion (ppb), its GWQS is 5 ppb.

Two metals were reported at concentrations exceeding their GWQSs: manganese (up to 900 ppb, GWQS 300 ppb) and sodium (up to 187,000 ppb, GWQS 20,000 ppb). Both are naturally occurring minerals.

SVOCs, polychlorinated biphenyls (PCBs), pesticides and herbicides were either not detected or reported at concentrations below their GWQSs.

The distribution of contaminant concentrations in groundwater do not indicate the potential for consequential off-site impacts to groundwater, attributable to contaminant migration from 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 completely fenced, which restricts public access. However, persons who enter the site could contact contaminants in the soil by walking on the site, digging or otherwise disturbing the soil. Groundwater at the site is not used for drinking or other purposes and the site is served by a public water supply. Volatile organic compounds in the soil vapor (air between soil particles), may move into overlying buildings and affect the indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. Environmental sampling indicates that soil vapor intrusion is not a concern for this site.

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>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>Groundwater</u>

RAOs for Public Health Protection

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

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 elements of the selected remedy, as shown in Figure 2, 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; and

• Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.

2. Excavation

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

• soil exceeding the site-specific action level of 3,900 ppm of lead; and

• soil containing total SVOCs exceeding 500 ppm.

Approximately 4,200 tons of contaminated soil will be removed from the site and treated prior to disposal using chemical stabilization, if necessary.

3. Backfill

On-site soil which does not exceed the above excavation criteria may be used below the cover system described in remedy element 4 below, 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 if necessary, to complete the backfilling of the excavation and establish the designed grades at the site.

4. Cover System

A site cover will be required to allow for commercial use of the site in areas where the upper one foot of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). 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. In-Situ Stabilization

In-situ stabilization (ISS) of soil exceeding the 6 NYCRR Part 371 hazardous criteria for lead, will be implemented in remedial areas TP-13 and SB-21, depicted in Figure 2. ISS is a process that uses a stabilizing agent which chemically changes contamination to make it less soluble. The contaminated soil will be mixed in place with stabilizing agents using an excavator or augers. The stabilized soil will then be covered with a cover system as described in remedy element 4 above, to prevent direct exposure. This treatment changes the contamination from a soluble form to a stable, insoluble compound to reduce or eliminate the matrix as a source of groundwater contamination.

6. 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 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 Department approved Site Management Plan.

7. Site Management Plan

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

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

• Institutional Controls: the Environmental Easement discussed in remedy element 6 above; and

• Engineering Controls: the site cover system, discussed in remedy element 4 above.

b. This plan also 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 water use restrictions;

• a provision that should a building foundation, building slab or pavement 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 Department notification; and

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

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

• monitoring of groundwater to assess the performance and effectiveness of the remedy; and

• a schedule of monitoring and frequency of submittals to the Department.





BCP SITE BOUNDARY
PARCEL BOUNDARY





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