RECORD OF DECISION

Former Wood Service Station
Environmental Restoration Project
Ilion, Herkimer County
Site No. E622026
March 2011

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

DECLARATION STATEMENT - RECORD OF DECISION

Former Wood Service Station
Environmental Restoration Project
Ilion, Herkimer County
Site No. E622026
March 2011

Statement of Purpose and Basis

This document presents the remedy for the Former Wood Service Station site, an environmental restoration site. The remedial program was chosen in accordance with the New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR) Part 375.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the Former Wood Service Station site and the public's input to the proposed remedy presented by the Department. A listing of the documents included as a part of the Administrative Record is included in Appendix B of the ROD.

Description of Selected Remedy

During the course of the investigation certain actions, known as interim remedial measures (IRMs), were undertaken at the above referenced site. An IRM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the remedial investigation (RI) or alternatives analysis (AA). The IRM(s) undertaken at this site are discussed in Section 5.2.

Based on the implementation of the IRM(s), the findings of the investigation of this site indicate that the site no longer poses a threat to human health or the environment; therefore No Further Action is the selected remedy. The remedy may include continued operation of a remedial system if one was installed during the IRM and the implementation of any prescribed institutional controls/engineering controls (ICs/ECs) that have been identified as being part of the remedy for the site.

The IRM(s) conducted at the site attained the remediation objectives identified for this site in Exhibit B for the protection of public health and the environment.

New York State Department of Health Acceptance

The New York State Department of Health (NYSDOH) concurs that the remedy for this site is protective of human health.

Declaration

The selected remedy is protective of human health and the environment, complies with State and Federal requirements that are legally applicable or relevant and appropriate to the remedial action to the extent practicable, and is cost effective. This remedy utilizes permanent solutions and alternative treatment or resource recovery technologies, to the maximum extent practicable, and satisfies the preference for remedies that reduce toxicity, mobility, or volume as a principal element.

MAR 29 2011

Date

Dale A. Desnoyers, Director
Division of Environmental Remediation

RECORD OF DECISION

Former Wood Service Station
Ilion, Herkimer County
Site No. E622026
March 2011

SECTION 1: SUMMARY AND PURPOSE

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), is proposing a remedy for the above referenced site. The disposal of contaminants at the site resulted in threats to public health and the environment that were addressed by actions known as interim remedial measures (IRMs), which were undertaken at the site. An IRM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the remedial investigation (RI) or feasibility study (FS). The IRMs undertaken at this site are discussed in Section 5.2. Contaminants include hazardous wastes and/or petroleum.

Based on the implementation of the IRM(s), the findings of the investigation of this site indicate that the site no longer poses a threat to human health or the environment; therefore No Further Action is the remedy selected by this Record of Decision (ROD). A No Further Action remedy may include continued operation of any remedial system installed during the IRM and the implementation of any prescribed controls that have been identified as being part of the proposed remedy for the site.

The IRM(s) conducted at the site attained the remediation objectives identified for this site, which are presented in the attached exhibits, for the protection of public health and the environment. This ROD identifies the IRM(s) conducted and discusses the basis for No Further Action.

The 1996 Clean Water/ Clean Air Bond Act provides funding to municipalities for the investigation and cleanup of brownfields. Brownfields are abandoned, idled, or under-used properties where redevelopment is complicated by real or perceived environmental contamination. They typically are former industrial or commercial properties where operations may have resulted in environmental contamination. Brownfields often pose not only environmental, but legal and financial burdens on communities. Under the Environmental Restoration Program, the state provides grants to municipalities to reimburse up to 90 percent of eligible costs for site investigation and remediation activities. Once remediated, the property can then be reused.

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: SITE DESCRIPTION AND HISTORY

Location: The Former Wood Service Station Site is located at 123 West Main Street in the Village of Ilion. The site is 0.52 acres in size and is situated on the south side of West Main Street.

Site Features: The main site features include a two story service station on the eastern side of the site and a parking lot area on the western half of the site. The eastern edge of the site is covered with perennial grasses and southern portion of the site are wooded. Steel Creek is located on the eastern boundary of the site and flows to the north.

Current Zoning/Uses: The site is currently inactive, and is zoned for commercial use. The surrounding parcels are for a combination of residential, commercial, utility and road right-of-ways and surface water. The nearest residential properties are located over 1000 feet southwest of the site beyond a wooded area and northeast beyond West Main Street and Steel Creek.

Historical Uses: The site is the location of a former service station and had been used for petroleum storage and distribution since 1925. The site was abandoned sometime prior to 2003 and the Village of Ilion acquired the property from Herkimer County in 2006 through a quick claim deed. A two-story commercial structure and parking lot are currently located on the site. The on-site structure was used for retail sales and automotive repairs.

Site Geology and Hydrogeology: The subsurface investigation revealed sand and gravel fill material generally from grade to the end of borings, which ranged up to 20 feet below grade. Native sand, gravel, and silt were observed below the fill material at depths ranging from 12 to 20 feet in portions of the site. Groundwater was generally encountered at a depth of 10 to 14 feet on the site. Bedrock was not encountered during the subsurface investigation.

A site location map is attached as Figure 1.

SECTION 3: 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 restricted-residential use (which allows for commercial use and industrial use) as described in Part 375-1.8(g) is/are being evaluated in addition to an alternative which would allow for unrestricted use of the site.

A comparison of the results of the investigation to the appropriate standards, criteria and guidance values (SCGs) for the identified land use and the unrestricted use SCGs for the site contaminants is included in the Tables for the media being evaluated in Exhibit A.

SECTION 4: ENFORCEMENT STATUS

Potentially Responsible Parties (PRPs) are those who may be legally liable for contamination at a

site. This may include past or present owners and operators, waste generators, and haulers.

No PRPs have been documented to date.

Since no viable PRPs have been identified, there are currently no ongoing enforcement actions. However, legal action may be initiated at a future date by the state to recover state response costs should PRPs be identified. Village of Ilion will assist the state in its efforts by providing all information to the state which identifies PRPs. Village of Ilion will also not enter into any agreement regarding response costs without the approval of the Department.

SECTION 5: SITE CONTAMINATION

5.1: Summary of the Remedial Investigation

A Remedial Investigation (RI) has been conducted. The purpose of the RI was to define the nature and extent of any contamination resulting from previous activities at the site. The field activities and findings of the investigation are described in the RI Report.

The following general activities are conducted during an RI:

- Research of historical information,
- Geophysical survey to determine the lateral extent of wastes,
- Test pits, soil borings, and monitoring well installations,
- Sampling of waste, surface and subsurface soils, groundwater, and soil vapor,
- Sampling of surface water and sediment,
- Ecological and Human Health Exposure Assessments.

5.1.1: 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. The tables found in Exhibit A list the applicable SCG in the footnotes. For a full listing of all SCGs see: http://www.dec.ny.gov/regulations/61794.html

5.1.2: RI Information

The analytical data collected on this site includes data for:

- groundwater
- soil
- soil vapor

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 in Exhibit A. Additionally, the RI Report contains a full discussion of the data. The contaminant(s) of concern identified at this site is/are:

benzo(b)fluoranthene	arsenic
benzo[k]fluoranthene	methylene chloride
benzo(a)pyrene	xylene (mixed)
dibenz[a,h]anthracene	chrysene
toluene	indeno(1,2,3-cd)pyrene
ethylbenzene	vinyl chloride
naphthalene	1,2-dichloroethane

Based on the investigation results, comparison to the SCGs, and the potential public health and environmental exposure routes, certain media and areas of the site required remediation. These media were addressed by the IRM(s) described in Section 6.2. More complete information can be found in the RI Report and the IRM Construction Completion Report.

5.2: 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 Record of Decision.

The following IRM(s) has/have been completed at this site based on conditions observed during the RI.

Underground Storage Tank Removal Interim Remedial Measure

Five underground storage tanks (USTs) were removed as part of an IRM in August of 2008. The tanks were in poor condition and holes were observed in some tanks during removal. Contaminated soil was observed during the tank removal at depths ranging from 8 to 13 feet below grade. Groundwater was encountered at a depth of 10 feet. All contaminated soil was removed, where possible. However, excavation was limited by the West Main Street right of way and the need to protect the integrity of the road. An area of approximately 80 feet by 20 feet was excavated during tank removal, and 500 tons of petroleum-contaminated soils were removed for disposal. Confirmation samples were submitted for laboratory analysis and exceedances of

unrestricted SCOs were documented at the bottom of the excavation at the northwestern end, and on both the bottom and sidewall along West Main Street. Clean fill was brought in to replace the excavated soil and establish the designed grades at the site. In addition, several hydraulic lifts and various automobile materials and waste were removed, such as waste oil, antifreeze and hydraulic fluids.

5.3: 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.*

Since some contaminated soils remain at the site below concrete or clean backfill, people will not come in contact with contaminated soils unless they dig below the surface material. Contaminated groundwater at the site is not used for drinking or other purposes and the site is served by a public water supply that is not affected by site-related contamination. Volatile organic compounds in groundwater may move into the soil vapor (air spaces within the soil), which in turn may move into overlying buildings and affect indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. The potential exists for people to inhale site contaminants in indoor air due to soil vapor intrusion for any future on-site building redevelopment and occupancy.

5.4: 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.

Based upon the resources and pathways identified and the toxicity of the contaminants of ecological concern at this site, a Fish and Wildlife Resources Impact Analysis (FWRIA) was deemed not necessary for OU 01.

Based upon investigations conducted to date, the primary contaminants of concern for the site include VOCs, SVOCs and metals. Impacts to groundwater and soil have been documented above groundwater standards and the unrestricted soil cleanup objectives.

Contamination is related to underground storage tanks and piping which contained petroleum products. Given the low level of soil contamination remaining, the small size of the site, the absence of off-site groundwater contamination and that residual contamination is well below the ground surface and is not accessible; this site no longer presents a threat to the environment.

SECTION 6: SUMMARY OF SELECTED REMEDY

1. The existing buildings and pavement at the site will form the site cover; there is currently no exposed surface soil. A site cover will be maintained as a component of any future site

development, which will consist either of the structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper two feet of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where the soil cover is required it will be a minimum of two feet of soil, meeting the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d) for restricted-residential use. The soil cover will be placed over a demarcation layer, with the upper six inches of the soil of sufficient quality to maintain a vegetation layer. Any fill material brought to the site will meet the requirements for the identified site use as set forth in 6 NYCRR Part 375-6.7(d).

2. Imposition of an institutional control in the form of an environmental easement that will: (a) limit the use and development of the controlled property for restricted residential, commercial and industrial uses as defined by Part 375-1.8(g), though land use is subject to local zoning laws; (b) restrict use of groundwater as a source of potable or process water without necessary water quality treatment as determined by the New York State Department of Health or the County Health Department; (c) require the property owner to complete and submit to the NYSDEC a periodic certification; and (d) the implementation of the required site management plan.

3. Development of a site management plan, which will include the following: (a) identification and mapping of materials and areas which must be managed in accordance with the site management plan; (b) require that the current cover system be maintained; (c) an excavation plan to establish how soils will be tested and properly handled to protect the health and safety of workers and the nearby community if they are encountered during future excavations; (d) an evaluation of the potential for vapor intrusion for any existing or new buildings must be performed upon redevelopment of the site and the evaluation must include provisions for the monitoring or mitigation, if deemed necessary by the Department; (e) provide the New York State Department of Transportation (NYSDOT) with all relevant reports and data to identify the location and requirements to handle the contaminated soils in the NYSDOT right-of-way; and (f) a groundwater monitoring plan to confirm the effectiveness of the remedy.

4. The Village of Ilion or subsequent property owner will provide a periodic certification of institutional and engineering controls for the site, prepared and submitted by a professional engineer or such other expert, acceptable to the Department, until the Department notifies the property owner in writing that this certification is no longer needed. This submittal will: (a) contain certification that the institutional controls and engineering controls put in place are still in place, and are either unchanged from the previous certification or are compliant with Department-approved modifications; (b) allow the Department access to the site; and (c) state that nothing has occurred that will impair the ability of the control to protect public health or the environment, or constitute a violation or failure to comply with the site management plan unless otherwise approved by the Department.

Exhibit A

Nature and Extent of Contamination

This section describes the findings of the Remedial investigation (RI). The RI was conducted in December of 2008 following the August 2008 Interim Remedial Measure (IRM). As described in the RI report, waste/source materials were identified at the site and were impacting groundwater and soil.

Groundwater – Temporary Wells (Post IRM)

Four temporary wells were installed in December of 2008 (see Figure 3). Groundwater samples were collected for analysis which included VOCs, MTBE, SVOCs, metals, and PCBs. VOC and metal contamination documented in the temporary wells was found predominately in one of the temporary wells (TW-01). This well was located within the former underground storage tank area along West Main Street; however, this area was subsequently excavated during the August 2008 interim remedial measure. The following table illustrates the contaminant concentrations that exceeded the NYSDEC Groundwater Standards from the site's temporary monitoring well samples. Downgradient wells, MW-6 and MW-7 did not exhibit any site related contamination.

Table 1 - Groundwater (Temporary Wells - Post IRM)

	Detected Constituents	Concentration Range Detected (ppb)[a]	SCG[b] (ppb)	Frequency Exceeding SCG
VOC	Toluene	ND to 29 ppb	5	1 out of 4
	Ethyl Benzene	ND to 1,400 ppb	5	1 out of 4
	o-Xylene	ND to 250	5	1 out of 4
	Isopropylbenzene	ND to 120	5	1 out of 4
Metals	Arsenic	ND to 61.6	25	2 out of 4
	Copper	ND to 201	200	1 out of 4
	Iron	2,510 to 100,000	300	4 out of 4
	Lead	ND to 268	25	3 out of 4
	Magnesium	ND to 88,300	35,000	2 out of 4
	Manganese	403 to 3,450	300	4 out of 4
	Sodium	57,400 to 113,000	20,000	4 out of 4

a - ppb: parts per billion, which is equivalent to micrograms per liter, ug/L, in water.

b- SCG: Standard Criteria or Guidance - Ambient Water Quality Standards and Guidance Values (TOGs 1.1.1), 6 NYCRR Part 703, Surface water and Groundwater Quality Standards, and Part 5 of the New York State Sanitary Code (10 NYCRR Part 5).

Groundwater data from the temporary monitoring wells exhibited site related petroleum contamination and elevated levels of metals. The elevated inorganic (metals) levels identified in the groundwater are naturally occurring in groundwater and are not considered site-related.

Groundwater – Permanent Wells
(Post IRM)

Based on the groundwater data and elevations obtained from the temporary wells and confirmation sampling data obtained during the IRM, seven permanent monitoring wells were installed in April of 2009 (see Figure 3). The wells were installed to depths ranging from 15 to 19 feet below grade. The following table illustrates the contaminant concentrations that exceeded the NYSDEC Groundwater Standards (post-IRM) from the site's permanent monitoring well samples.

Table 2 – Groundwater (Permanent Wells -Post IRM)

	Detected Constituents	Concentration Range Detected (ppb)[a]	SCG[b] (ppb)	Frequency Exceeding SCG
VOC	Toluene	ND to 110 ppb	5	1 out of 7
	Ethyl Benzene	ND to 1,500 ppb	5	1 out of 7
	o-Xylene	ND to 900	5	1 out of 7
	Isopropylbenzene	ND to 120	5	1 out of 7
Semi-VOC	2,4-Dimethylphenol	ND to 3.4	1	1 out of 7
	Naphthalene	ND to 130	10	1 out of 7
Metals	Iron	312 to 1,510	300	3 out of 7
	Manganese	397 to 2,430	300	3 out of 7
	Selenium	ND to 13.5	10	1 out of 7
	Sodium	71,500 to 248,000	20,000	7 out of 7

a - ppb: parts per billion, which is equivalent to micrograms per liter, ug/L, in water.
b- SCG: Standard Criteria or Guidance - Ambient Water Quality Standards and Guidance Values (TOGs 1.1.1), 6 NYCRR Part 703, Surface water and Groundwater Quality Standards, and Part 5 of the New York State Sanitary Code (10 NYCRR Part 5).

VOC and SVOC contamination documented in the permanent wells was found only in monitoring well (MW-1). This well is located within the former underground storage tank area along West Main Street and was in the vicinity of

TW-1. The levels of VOCs and SVOCs found in MW-1 are expected to reduce over time through natural processes with the removal of the source. The elevated inorganic (metals) levels identified in the groundwater are naturally occurring in groundwater and are not considered site-related. Based on this conclusion, no further action for groundwater is required.

Surface Soil

Nine surface soil samples (0-2 inches below grade) were collected during the RI (SS-01 through SS-09) and were analyzed for SVOCs, metals, and PCBs (see Figure 2). No SVOCs or PCBs were detected in surface soils. Only one sample contained arsenic in excess of the restricted residential SCO (SS-07). This sample was located off-site and to the south of the on-site building, in a vegetated wooded area, and contained arsenic at 19.8 ppm. This exceedance is not considered to be significant, as it was only found in 1 out of 9 samples marginally exceeding the SCO and arsenic which is a naturally occurring element in the soil in New York. The following table illustrates the contaminant concentrations that exceeded the Part 375 restricted residential use SCOs from the surface soil sampling.

Table 3 - Surface Soil(Post IRM)

Detected Constituents		Concentration Range Detected (ppm)[a]	Unrestricted SCO[b] (ppm)	Frequency Exceeding Unrestricted SCO	Restricted-Residential SCO[c] (ppm)	Frequency Exceeding Restricted Residential SCO
Metals	Arsenic	ND to 19.8	13	1 out of 9	16	1 out of 9
	Chromium	9.39 to 13.9	1	9 out of 9	110	0 out of 9
	Lead	5.67 to 225	63	4 out of 9	400	0 out of 9
	Mercury	.025 to 0.2	0.18	1 out of 9	0.81	0 out of 9
	Silver	1.71 to 3.0	2	6 out of 9	180	0 out of 9
	Zinc	32.1 to 138	109	1 out of 9	10,000	0 out of 9

a - ppm: parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil;
b - SCG: Part 375-6.8(a), Unrestricted Soil Cleanup Objectives.
c - SCG: Part 375-6.8(b), Restricted-Residential Soil Cleanup Objectives.

The site surface/cover is comprised of clean fill in the tank excavation area, pavement, concrete and a narrow vegetated/wooded strip of land around the perimeter of the building. The backfill placed in the tank area excavation meets 6NYCRR Part 375-6.8 (b) for restricted–residential and sampling of site surface soil demonstrated that existing on-site surface soil meets restricted residential SCOs. The one exceedance for Arsenic in surface soils above restricted residential SCO's was from an off-site location. Therefore, no remedial actions are necessary to address surface soils.

Soil Subsurface

During the RI, twenty (20) subsurface soil samples were obtained on-site with twelve (12) samples obtained from the paved parking area along West Main Street, five (5) samples from the vegetated areas east and south of the structure, and three (3) samples in the former service station (see Figure 2). Samples were taken from ground surface to a depth of 20 feet below grade. Impacts were noted at various depths from 4 to 20 feet below grade. The contamination detected in the subsurface soil is summarized in the following table.

Table 4 - Soil Subsurface (Post IRM)

Detected Constituents		Concentration Range Detected (ppm)[a]	Unrestricted SCO[b] (ppm)	Frequency Exceeding Unrestricted SCO	Protection of GW SCO[c] (ppm)	Frequency Exceeding Protection of Groundwater SCO
VOCs	Ethylbenzene	ND to 5.8	1	2 out of 20	1	2 out of 20
SVOCs	2-Methlyphenol	ND to 0.87	0.33	1 out of 20	1,000	0 out of 20
	3+4-Methylphenols	ND to 1.7	0.33	1 out of 20	1,000	0 out of 20
	Naphthalene	ND to 180	12	1 out of 20	12	1 out of 20
	Fluorene	ND to 55	30	1 out of 20	386	0 out of 20
	Phenanthrene	ND to 220	100	1 out of 20	1,000	0 out of 20
	Fluoranthene	ND to 170	100	1 out of 20	1,000	0 out of 20
	Pyrene	ND to 110	100	1 out of 20	1,000	0 out of 20
	Benzo(a)anthracene	ND to 61	1	1 out of 20	1	1 out of 20
	Benzo(b)fluoranthene	ND to 55	1	1 out of 20	1.7	1 out of 20
	Benzo(k)fluoranthene	ND to 23	0.8	1 out of 20	1.7	1 out of 20
	Benzo(a)pyrene	ND to 43	1	1 out of 20	22	1 out of 20
	Chrysene	ND to 53	1	1 out of 20	1	1 out of 20
	Dibenz(a,h)anthracene	ND to 5.4	0.33	1 out of 20	1,000	0 out of 20
	Indeno(1,2,3-cd)pyrene	ND to 28	0.5	1 out of 20	8.2	1 out of 20
Metals	Chromium	9.43 to 19.3	1	15 out of 15	19	1 out of 15
	Copper	16 to 50.2	50	1 out of 15	1,720	0 out of 15
	Silver	2.36 to 3.66	2	15 out of 15	8.3	0 out of 15
	Zinc	36.5 to 119	109	1 out of 15	2,480	0 out of 15

a - ppm: parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil.
b - SCG: Part 375-6.8(a), Unrestricted Soil Cleanup Objectives.
c - SCG: Part 375-6.8(b), Protection of Groundwater
N – Indicates spike sample recovery was not within the quality control limits.
J – Indicates an estimated value.

Based on these results, three areas with either VOC or SVOC contamination were identified. However, these areas were excavated during the IRM and the levels are expected to diminish over time. (See discussion at Section 6.2).

Soil Post IRM Confirmation Sampling Results

In August of 2008 known areas of impacts and/or locations where underground storage tanks and/or hydraulic lifts were situated were excavated as part of an IRM. Following the removal action, confirmation sampling was conducted along the sidewalls and the bottom of the excavation areas. Sixteen confirmation samples were obtained and were compared to Part 375 SCOs (see Figure 4). The compounds identified are shown below in Table 5.

Table 5 - Soil Subsurface (Post IRM)

Detected Constituents		Concentration Range Detected (ppm)[a]	Unrestricted SCO[b] (ppm)	Frequency Exceeding Unrestricted SCO	Protection of Groundwater (ppm)c	Frequency Exceeding Protection of Groundwater SCO
VOCs	Acetone	ND to 0.130	0.05	1 out of 16	0.05	1 out of 16
	2- Butanone	ND to 0.16	0.12	1 out of 16	0.12	1 out of 16
	Ethylbenzene	ND to 41	1	1 out of 16	1	1 out of 16
	1,2-Dichloroethane	ND to 0.032	0.020	1 out of 16	0.0.02	1 out of 16
	Methylene Chloride	ND to 0.13	0.05	4 out of 16	0.5	0 out of 16
	Vinyl Chloride	ND to 0.160	0.50	1 out of 16	0.02	1 out of 16
SVOCs	Naphthalene	ND to 15	12	1 out of 16	12	1 out of 16
	Benzo(a)anthracene	ND to 1.4	1	1 out of 16	1	1 out of 16
	Benzo(b)fluoranthene	ND to 2.4	1	1 out of 16	1.7	1 out of 16
	Benzo(a)pyrene	ND to 1.5	1	1 out of 16	22	0 out of 16
	Chrysene	ND to 1.5	1	1 out of 16	2	0 out of 16
	Indeno(1,2,3-cd)pyrene	ND to 1	0.5	1 out of 16	8.2	0 out of 16
Metals	Chromium	1.63 to 15.9	1	16 out of 16	19	0 out of 16
	Mercury	0.010 to 0.359	0.18	1 out of 16	0.73	0 out of 16

a - ppm: parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil.
b - SCG: Part 375-6.8(a), Unrestricted Soil Cleanup Objectives.
c - SCG: Part 375-6.8(b), Protection of Groundwater.

Accessible soil contamination identified during the RI was addressed during the IRM described in Section 6.2. Two areas of soil contamination were not readily accessible. One area is located inside the building in Bay 5. The southwest sidewall sample at 6-8 feet below grade exceeded the SCOs for benzo (a) pyrene. The other area is along West Main Street where excavation was limited due to the NYSDOT setback and/or underground utilities (see Figure 5). Confirmation samples were taken from areas exhibiting visual and/or olfactory evidence of contamination in order to evaluate the areas of most likely impacts. Confirmation sampling showed limited VOC and SVOC concentrations above the unrestricted and the protection of groundwater SCOs along the sidewalls and at depth. The contamination remaining in these two areas is not considered significant and will be identified and managed under the site management plan.

Soil Vapor

Following the IRM, the potential for soil vapor intrusion resulting from the presence of site related soil or groundwater contamination was evaluated in December of 2008 by sampling soil vapor and sub-slab soil vapor. The survey included the sampling of seven soil vapor points (SV-01 through SV-07) along the perimeter of the former service station and West Main Street, and also included two additional sub-slab vapor points (SSV-1 and SSV-2) in Bays 1 and 5 of the former service station. Samples were analyzed for VOCs (EPA Method TO-15).

The soil vapor intrusion investigation revealed detectable levels of VOCs at all locations, with the highest levels occurring at SV-01. This vapor sampling point is located to the north of the tank excavation area along West Main Street. Moderate levels of VOCs were observed at SV-05 (outside the former service station near the office) and SSV-1 (Bay 5 of the former service station). The VOCs detected are not included in the NYSDOH Guidance for Evaluating Soil Vapor Intrusion in New York State. However, the presence of VOCs in soil vapor will be addressed under the site management plan.

Exhibit B

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 objectives for this site are:

Public Health Protection

Groundwater

- Prevent people from drinking groundwater with contaminant levels exceeding drinking water standards.
- Prevent inhalation from contaminants volatilizing from the groundwater.

Soil

- Prevent ingestion/direct contact with contaminated soil.
- Prevent inhalation of contaminants volatilizing from the soil during intrusive activities.

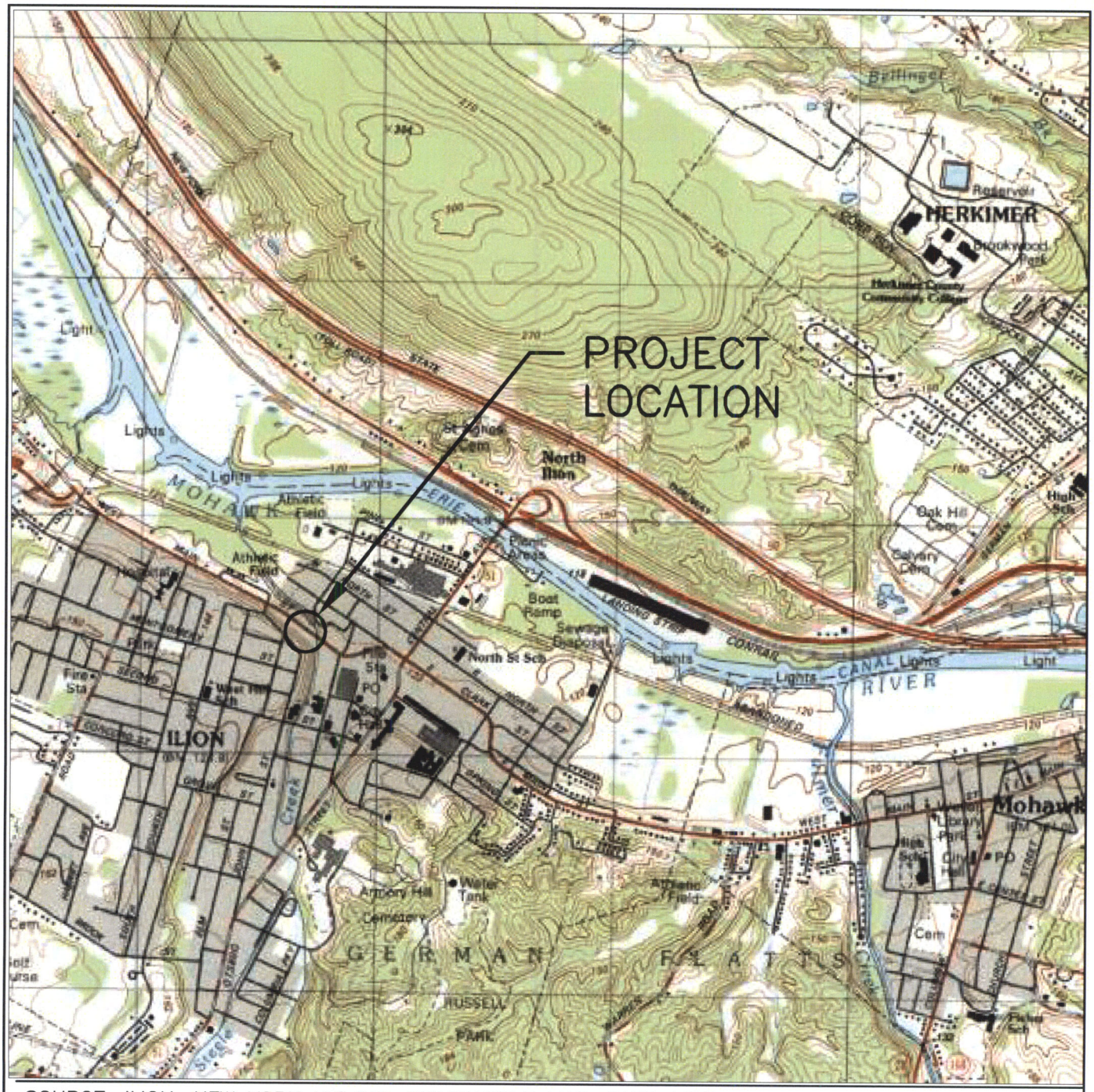
Soil Vapor

- Mitigate impacts to public health resulting from residual contaminated soils encountered during intrusive activities, or the potential for, soil vapor intrusion into buildings at a site.

Environmental Protection

Soil

- Prevent migration of contaminants that would result in groundwater or surface water contamination.
- Remove contaminated soils to restore the site to pre-disposal conditions where technically feasible and/or not impeded by road right-of-ways, bridge foundations and/or existing structures.



SOURCE: ILION, NEW YORK U.S.G.S. QUADRANGLE MAP, DATE 1976.

QUADRANGLE LOCATION

2000' 0 2000'

1"=2000'

N

TRUE OR CALLED NORTH

Figure 1

VILLAGE OF ILION
FORMER WOOD SERVICE STATION PROPERTY
ENVIRONMENTAL RESTORATION PROJECT
PROJECT LOCATION MAP

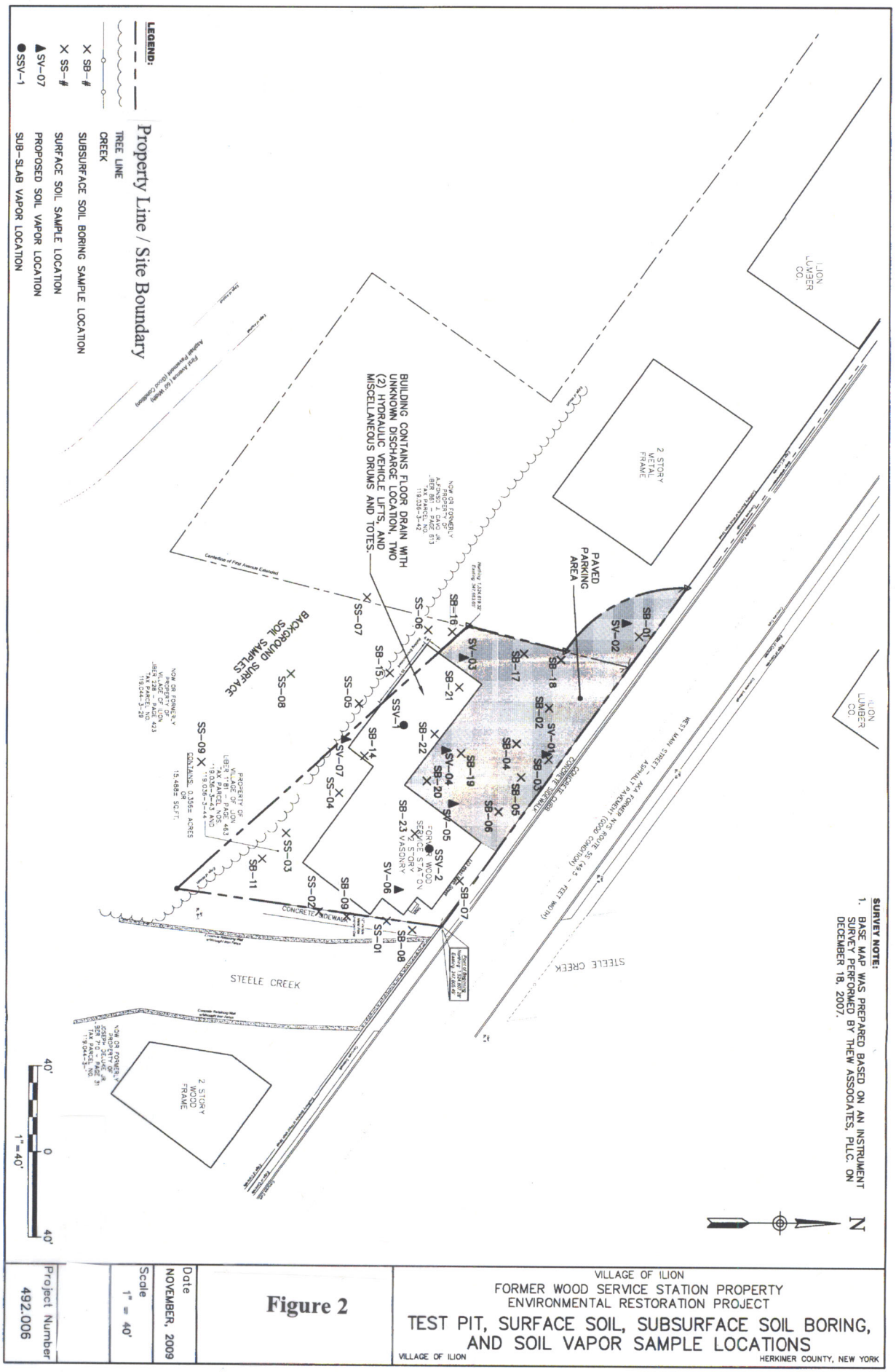
VILLAGE OF ILION HERKIMER COUNTY, NEW YORK

Date	Scale
JULY, 2009	1" = 2000'

Figure Number	Project Number
1	492.006

Plotted: ...30, 2009 – 11:11AM SYR By: jgs
I:\Shared\400\492006\ERP\492006_FIG1.dwg

Plotted: Mar 15, 2010 – 1:35PM SYR By: jgs
I:\Shared\400\492006\ERP\492006_FIG5-R.dwg



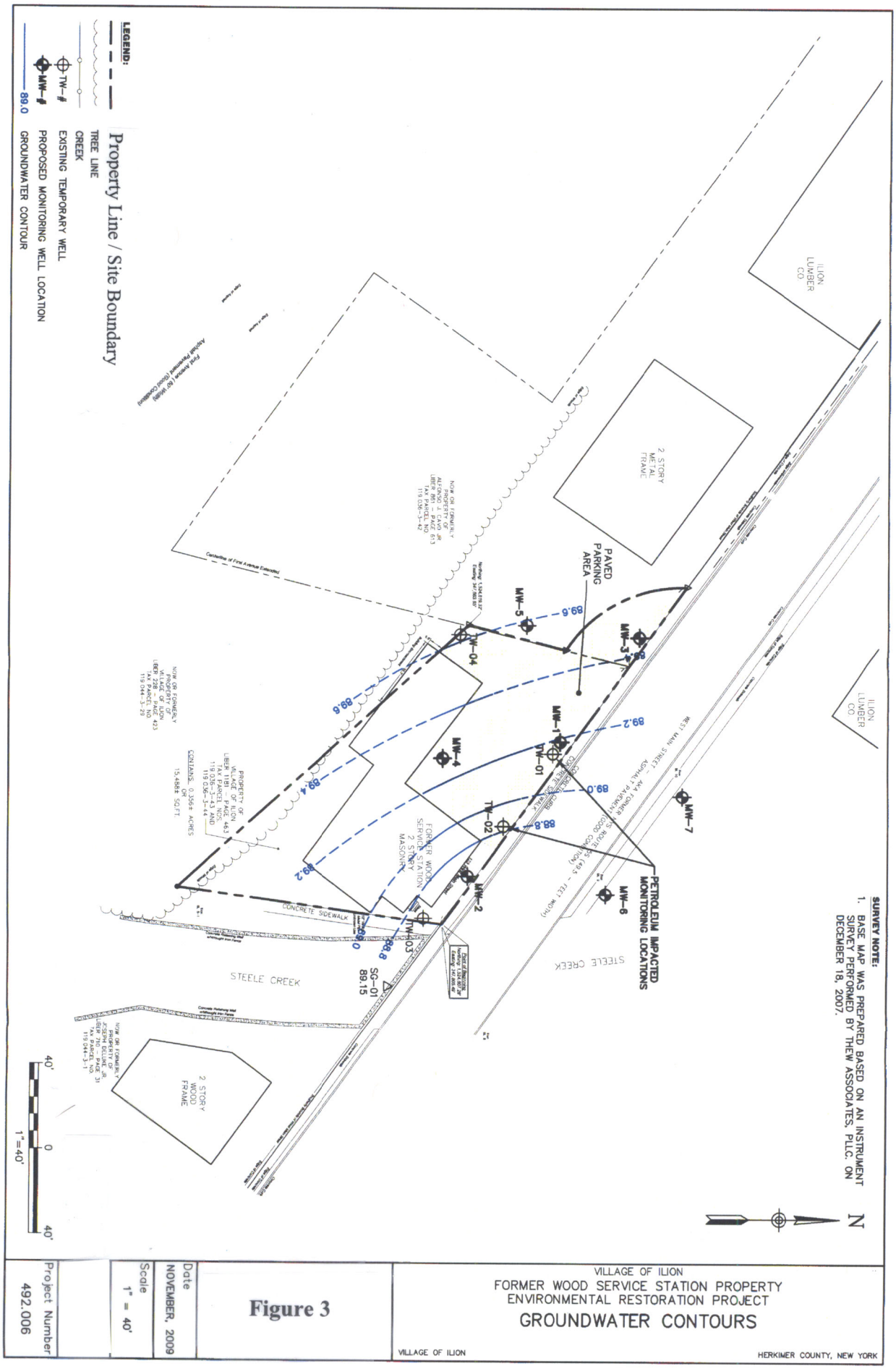
SURVEY NOTE:
1. BASE MAP WAS PREPARED BASED ON AN INSTRUMENT SURVEY PERFORMED BY THEW ASSOCIATES, PLLC. ON DECEMBER 18, 2007.

Figure 2

VILLAGE OF ILION
FORMER WOOD SERVICE STATION PROPERTY
ENVIRONMENTAL RESTORATION PROJECT
TEST PIT, SURFACE SOIL, SUBSURFACE SOIL BORING, AND SOIL VAPOR SAMPLE LOCATIONS
VILLAGE OF ILION — HERKIMER COUNTY, NEW YORK

Project Number	Date	Scale
492.006	NOVEMBER, 2009	1" = 40'

Plotted: Nov 30, 2009 – 11:16AM SYR By: jgs
I:\Shared\400\492006\ERP\492006_FIG7-R.dwg

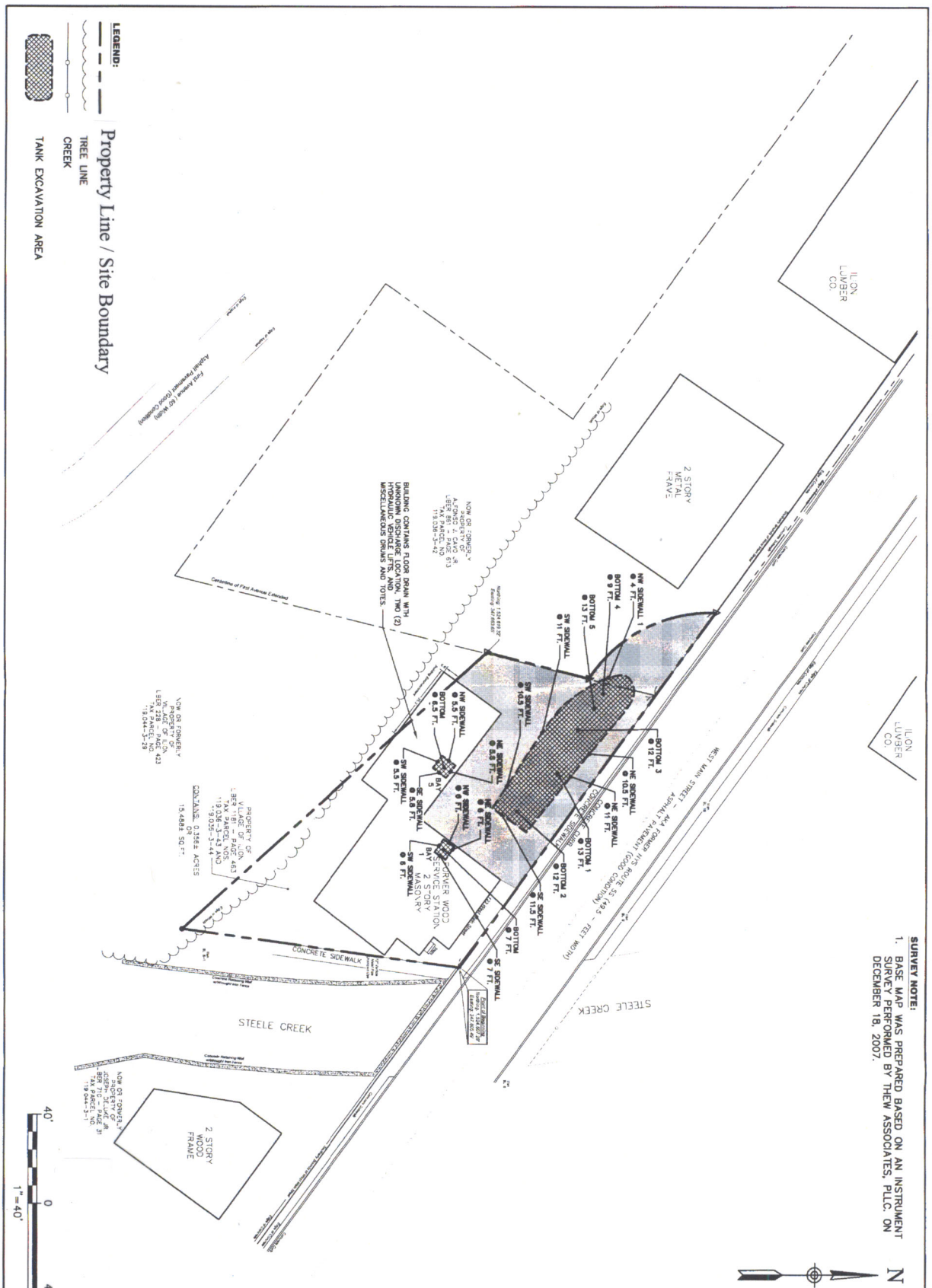


Project Number 492.006	Scale 1" = 40'	Date NOVEMBER, 2009	**Figure 3**

VILLAGE OF ILION
FORMER WOOD SERVICE STATION PROPERTY
ENVIRONMENTAL RESTORATION PROJECT
GROUNDWATER CONTOURS

VILLAGE OF ILION — HERKIMER COUNTY, NEW YORK

Plotted: Nov 30, 2009 – 11:13AM SYR By: jgs
I:\Shared\400\492006\ERP\492006_FIG4–R.dwg

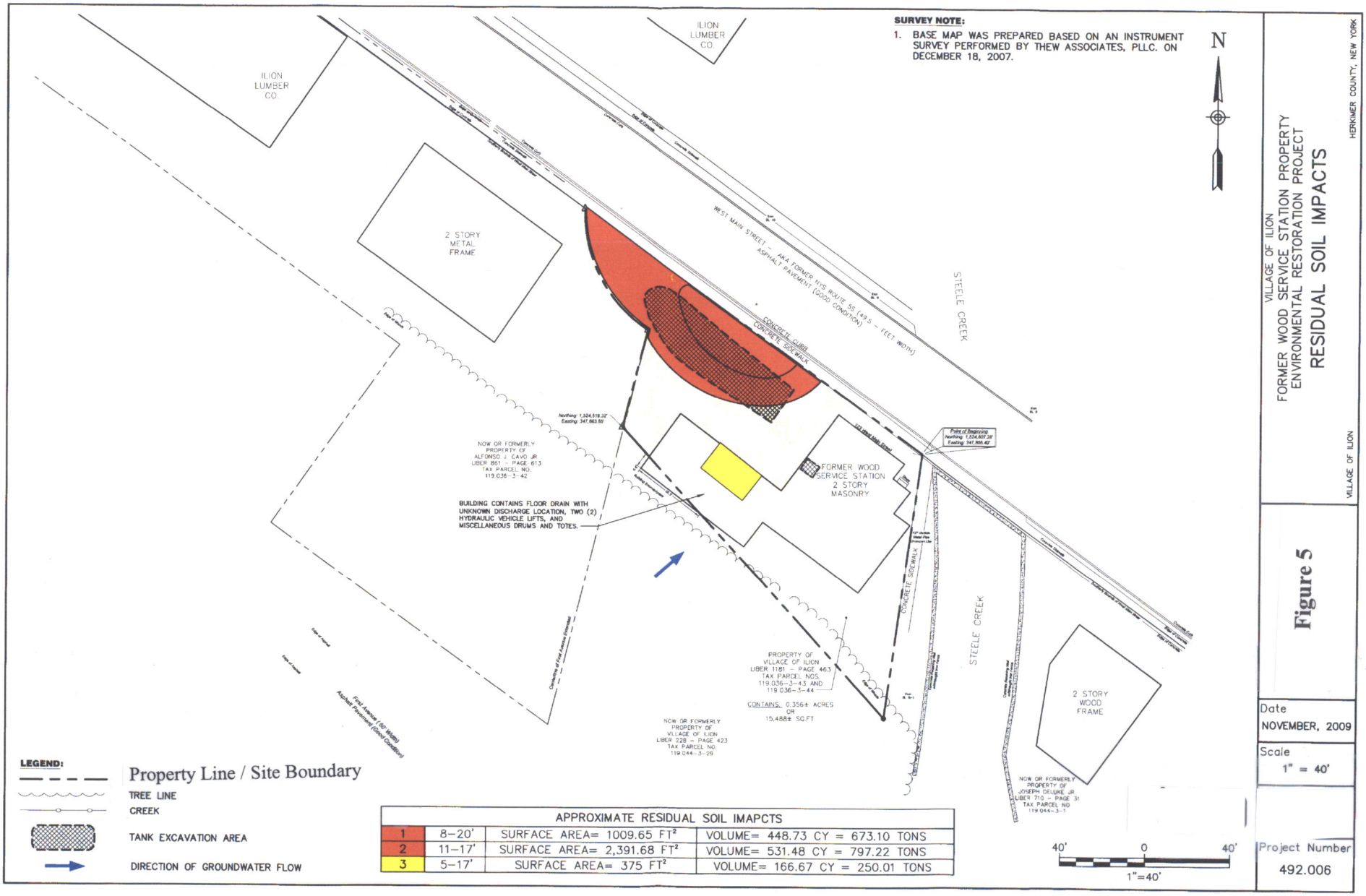


SURVEY NOTE:
1. BASE MAP WAS PREPARED BASED ON AN INSTRUMENT SURVEY PERFORMED BY THEW ASSOCIATES, PLLC. ON DECEMBER 18, 2007.

Figure 4

VILLAGE OF ILION
FORMER WOOD SERVICE STATION PROPERTY
ENVIRONMENTAL RESTORATION PROJECT
TANK & HYDRAULIC LIFT EXCAVATIONS
SAMPLE LOCATIONS
VILLAGE OF ILION HERKIMER COUNTY, NEW YORK

Project Number	Scale	Date
492.006	1" = 40'	NOVEMBER, 2009



APPROXIMATE RESIDUAL SOIL IMAPCTS			
1	8–20'	SURFACE AREA= 1009.65 FT²	VOLUME= 448.73 CY = 673.10 TONS
2	11–17'	SURFACE AREA= 2,391.68 FT²	VOLUME= 531.48 CY = 797.22 TONS
3	5–17'	SURFACE AREA= 375 FT²	VOLUME= 166.67 CY = 250.01 TONS

VILLAGE OF ILION
FORMER WOOD SERVICE STATION PROPERTY
ENVIRONMENTAL RESTORATION PROJECT
RESIDUAL SOIL IMPACTS
HERKIMER COUNTY, NEW YORK
VILLAGE OF ILION

Figure 5

Date
NOVEMBER, 2009

Scale
1" = 40'

Project Number
492.006

Plotted: Mar 15, 2010 - 1:36PM SYR By: jps
I:\Shared\400\492006\ERP\492006_FIG5-R.dwg

APPENDIX A

Responsiveness Summary

RESPONSIVENESS SUMMARY

Former Wood Service Station
Environmental Restoration Project
Ilion, Herkimer County
Site No. E622026

The Proposed Remedial Action Plan (PRAP) for the Former Wood Service Station site was prepared by the New York State Department of Environmental Conservation (the Department) in consultation with the New York State Department of Health (NYSDOH) and was issued to the document repositories on February 8, 2011. The PRAP outlined the no further action remedial measure proposed for Former Wood Service Station site.

The release of the PRAP was announced by sending a notice to the public contact list, informing the public of the opportunity to comment on the proposed remedy.

A public meeting was held on February 23, 2011, which included a presentation of the remedial investigation and interim remedial measure for the Former Wood Service Station as well as a discussion of the proposed remedy. The meeting provided an opportunity for citizens to discuss their concerns, ask questions and comment on the proposed remedy. These comments have become part of the Administrative Record for this site. The public comment period for the PRAP ended on March 25, 2011. This responsiveness summary responds to all questions and comments raised during the public comment period. The following are the comments received, with the Department's responses:

COMMENT 1: Will the wells be removed from the site?

RESPONSE 1: Yes, as part of the project closeout procedures, the monitoring wells will be decommissioned.

APPENDIX B

Administrative Record

Administrative Record

Former Wood Service Station
Environmental Restoration Project
Ilion, Herkimer County
Site No. E622026
March 2011

Proposed Remedial Action Plan for the Former Wood Service Station site, dated February 8, 2011, prepared by the Department

Site Investigation/Remedial Alternatives Report, dated June 2010, prepared by Barton and Loguidice, P.C.

Interim Remedial Measure Plans and Specifications, dated May 2008, prepared by Barton and Loguidice, P.C.

Site Investigation Work Plan, dated October 2007, prepared by Barton and Loguidice, P.C.