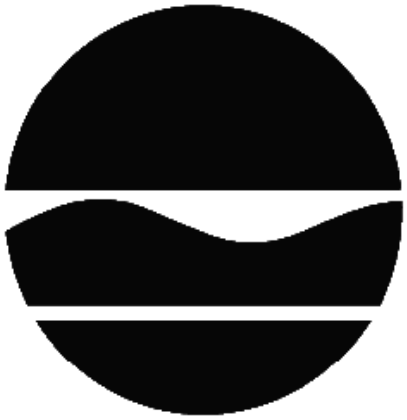
RECORD OF DECISION

Former Rome Cable Site, Bld. Complex #3
Operable Unit Number: 02
Environmental Restoration Project
Rome, Oneida County
Site No. E633053
March 2011



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

DECLARATION STATEMENT - RECORD OF DECISION

Former Rome Cable Site, Bld. Complex #3
Operable Unit Number: 02
Environmental Restoration Project
Rome, Oneida County
Site No. E633053
March 2011

Statement of Purpose and Basis

This document presents the remedy for Operable Unit Number: 02 of the Former Rome Cable Site, Bld. Complex #1 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 Operable Unit Number: 02 of the Former Rome Cable Site, Bld. Complex #1 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) oralternatives 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 23 2011

Date

Dale A. Desnoyers, Director
Division of Environmental Remediation

RECORD OF DECISION

Former Rome Cable Site, Bld. Complex #3
Rome, Oneida County
Site No. E633053
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 ar 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 Description: The site consists of the Former Rome Cable Corporation, Building Complex No. 1 (Operable Unit No. 1) and Complex 3 (Operable Unit No. 2), which is approximately 10.2 acres in size and is located in the City of Rome, Oneida County, NY.

Predominant Site Features: Historically, the site was covered by buildings, except for a paved loading dock, a paved parking area to the west and thin strips of perimeter grass/soil covered areas. In 2010, the buildings found on Operable Unit No. 2 (OU2) were razed, with the exception of the western tower. The City of Rome Police Department currently uses the tower for the local police radio system antennas.

Current Zoning/Use: The site is currently zoned industrial and is in an Empire Development Zone. Building complex No. 1 is currently occupied by the OWL Wire Company, which manufactures and spins wire for various industrial uses. The site is covered with clean crushed concrete and sand.

Surrounding Uses: The site is bounded on the north by New York Central Railroad property, on the east by South Madison Street, on the south by Ridge Street and on the west by the Rome Strip Steal.

Historical Source(s) of Contamination: The Rome Cable facility has been used for the manufacturing and spinning of wire in the City of Rome since the 1920's. The primary environmental concerns associated with the use of this site include: hazardous and non-hazardous industrial liquids which were used in the forming and spinning of wire; petroleum used to heat the on-site furnaces and as lubricants in equipment used for pipe insulation; and asbestos containing material.

Operable Units: The site was divided into two operable units. Operable unit 1 (OU1) is comprised of Building Complex No. 1 and consists of nine buildings where the various cable making operations took place. Operable unit 2 (OU2) is comprised of Building Complex 3 and consisted of six buildings and the west yard, prior to the demolition. The area is now open space with the exception of the tower located on the western end of the site. Operable Unit 2 is the subject of this document. A Record of Decision has yet to be issued for OU1.

Site Geology and Hydrogeology: The geology of the site consists of fill which consists of clay and silt with cinders to depths of three to seven feet below ground surface. The fill is underlain by medium sand and gravel with silt to depths of 14-16 feet below ground surface, which is underlain by fine sand to depths ranging from twenty-eight to thirty-five feet below ground surface. Soft clay with interbedded fine sand underlies the fine sand unit to depths ranging from fifty-two to fifty-nine feet, which is underlain by hard sand, gravel, clay and silt to depths of sixty-seven to seventy-eight feet below grade, which is underlain by bedrock, which consists of a Utica Shale. Groundwater flow is from northeast to southwest. The depth of groundwater ranges from six to nine feet below the surface.

Operable Unit (OU) Number 02 is the subject of this document.

A Record of Decision has yet to be issued for OU 01.

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 commercial use (which allows for 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. The Oneida County Industrial Development Agency will assist the state in its efforts by providing all information to the state which identifies PRPs. The Oneida County Industrial Development Agency 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 for this Operable Unit at this site is/are:

benz(a)anthracene	lead
benzo(a)pyrene	mercury
benzo(b)fluoranthene	chrysene
arsenic	chromium
barium	magnesium
copper	nickel

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.

Rome Cable OU2 IRM Waste and Tank Removal

During 2006 and 2007 an interim remedial measure (IRM) was conducted at the Rome Cable Complex No. 3. Loose asbestos hanging from piping, found on machinery and on the floor of the complex was abated. One hundred and eighty tons of PCB and oil contaminated wood block flooring was removed from the facility. Over 64,000 gallons of contaminated waste water and process water was collected and removed from various sumps, tanks and pits. Two hundred and fifty tons of solid waste and debris was removed for disposal off site. Mercury filled drains and mercury containing components were cleaned and collected for proper disposal. Assorted wire processing liquid (1,245 gallons) was collected for proper disposal. Other items such as fluorescent light bulbs, computer systems and scrap metal were collected and sorted for recycling and/or disposal.

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.*

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. People are not drinking the contaminated groundwater because the area is served by a public water supply that obtains its water from a different source. Also, they are not coming into contact with the groundwater unless they dig below the ground surface. Persons who enter the site may come into contact with contaminants in the soil by digging below the ground surface, and otherwise disturbing the soil, however most of the site is covered with crushed concrete and pavement, limiting potential contact with contaminated soil. Volatile organic compounds in the groundwater may move into the soil vapor (air spaces within the soil), which in turn 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. Volatile organic compounds are not contaminants of concern for this operable unit.

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 02.

Nature and Extent of Contamination: Based upon the remedial investigation conducted, the primary contaminants of concern in the soils and groundwater are volatile organic compounds (SVOCs) and inorganics (metals). The RI of OU1 indicates that surface soils have been impacted by SVOCs and metals, and subsurface soils have been impacted by arsenic and copper. A VOC-contaminated groundwater plume exists at OU1 and extends off-site into a commercial and residential area. Vapor intrusion is also occurring in one off-site commercial building due to the plume. The RI of OU2 indicates that on-site groundwater has been impacted by inorganic (metals) contamination. Due to the extensive development across the site no ecological resources have been impacted other than groundwater.

SECTION 6: SUMMARY OF SELECTED REMEDY

Based on the results of the investigations at the site and the IRM that has been performed the Department has selected No Further Action with institutional controls and engineering controls as the selected remedy for the site. The Department believes that this alternative will be protective of human health and the environment and will satisfy all SCGs as described above. Overall protectiveness is achieved through meeting the remediation goals listed above.

The elements of the restricted use remedy include:

1. Imposition of an institutional control in the form of an environmental easement that will: (a) limit the use and development of the property to commercial uses only; (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.

2. 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) 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; (c) a restoration plan to identify how the site will be restored at the conclusion of any redevelopment. The existing site backfill and crushed concrete forms 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 or a soil cover in areas where the upper one foot of exposed

surface soil will exceed the applicable soil cleanup objectives (SCOs). Where the soil cover is required it will be a minimum of one foot of soil, meeting the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d) for commercial 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); and (d) a groundwater monitoring plan to confirm the effectiveness of the remedy.

3. The OCIDA 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. As described in the RI report, waste/source materials were identified at the site and are impacting groundwater and soil.

Waste Materials

Wastes are defined in 6 NYCRR Part 375-1.2(aw) and include solid, industrial and/or hazardous wastes. Source areas are defined in 6 NYCRR Part 375(au). Source areas are areas of concern at a site were substantial quantities of contaminants are found which can migrate and release significant levels of contaminants to another environmental media. Wastes in Complex 3 were identified and included asbestos containing materials (ACM), oil-stained wood block flooring, drummed waste and liquids in equipment pits and dip tanks. Wastes identified during the RI were addressed during the IRM as described in Section 5.2.

Surface Soils

Only a thin strip of soil cover surrounds Building Complex 3. In order to investigate these soils, 18 surface soil samples were collected at the locations shown on Figure 2. Samples were collected every 300-feet around the site perimeter. Additional sampling was conducted on the west side of OU2 to evaluate the areas associated with the former No. 6 fuel oil tanks, the waste water storage tanks, the coal yard and previous material storage areas. All perimeter surface soil samples were collected by compositing an approximately 1-meter square area from 0- to 2-inches below the ground surface following removal of vegetation. These samples consisted of urban fill containing pieces of metal, brick, glass, cement, coal, wood, asphalt, tile, paper, cinders, ash and tar. Sample collection locations were positively biased toward stained or low areas. No heavy staining and/or odors were encountered during the sampling. All 18 surface soil samples were analyzed for NYSDEC Target Compound List (TCL), SVOC (including Tentatively Identified Compounds (TICs)), PCBs, and NYSDEC Target Analyte List (TAL) metals. Two representative surface soil samples (SS-2 and SS-11) were also analyzed for Total Organic Carbon (TOC).

The results of the sampling program indicate that SVOCs and metals were found above both unrestricted and commercial SCOs. The results of surface soil sampling are summarized in Table 3.

Table 1 - Surface Soil

Detected Constituents	Concentration Range Detected (ppm)[a]	Unrestricted SCO[b] (ppm)	Frequency Exceeding Unrestricted SCO	Commercial (SCO)[c] (ppm)	Frequency Exceeding Commercial SCO
SVOCs					
Benzo(a)anthracene	3.2 to 21 J	1	7 out of 18	5.6	2 out of 18
Benzo(a)pyrene	6.5 to 32	1	10 out of 18	1	3 out of 18
Benzo(b)fluoranthene	4.6 to 23	1	5 out of 18	5.6	2 out of 18

Indeno(1,2,3-cd)pyrene	1.6 J to 31 J	0.5	3 out of 18	5.6	1 out of 18
Metals					
Arsenic	ND to 57.4	13	4 out of 18	16	2 out of 18
Barium	ND to170 N	350	1 out of 18	400	0 out of 18
Copper	ND to 2,980	50	12 out of 18	270	3 out of 18
Lead	24.4 to 1080	63	13 out of 18	1,000	1 out of 18
Mercury	0.051 J to 6.7 J	0.18	5 out of 18	2.8	0 out of 18

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 Commercial Soil Cleanup Objectives.
U – Indicates compound was not detected.
N – Indicates spike sample recovery was not within the quality control limits.
E – Indicates a value estimated due to the presence of interferences.
J – Indicates an estimated value

Based on the findings of the Remedial Investigation and the historical site use, the surface soil contamination is attributable to long term industrial use of the site and not the result of hazardous waste or hazardous materials disposal. The surface soils surrounding the facility are covered by concrete, asphalt and/or a well established vegetative layer which is providing a sound protective barrier. In addition, the Rome Complex No. 3 was demolished in 2009/2010. The clean concrete was crushed and mixed with clean imported sand and gravel. The areas exhibiting elevated levels of SVOCs and metals have been covered with additional clean fill.

Subsurface Soil

In order to investigate subsurface soil conditions, eighteen soil borings were advanced around the perimeter of the facility (see Figure 3). During the IRMs described in Section 5.2, wood block flooring was removed and sumps were emptied and cleaned. The concrete floors was subsequently examined and it was determined that spills or waste materials did not penetrate the floor. Therefore, no soil sampling was performed beneath the slab and sampling was limited to the perimeter of the building. In the 2010, the building was demolished and the slab was removed. No evidence of contamination was found during this program. Sample locations B-2 and B-12 showed levels of SVOCs above SCOs for unrestricted use. Arsenic, copper, lead and mercury were also detected above unrestricted SCOs at sample locations B-2 (along the NY Central Railroad) and B12 (In the paved parking area west of Complex 3). No PCBs, VOCs or SVOCs were detected above the commercial SCOs. Arsenic and copper were the only metals detected above the commercial SCOs and only at one at sample location (B-2). The compounds identified are shown below in Table 4.

Table 2 - Subsurface Soil

Detected Constituents	Concentration Range Detected (ppm)[a]	Unrestricted SCO (ppm)	Frequency Exceeding Unrestricted SCO	Commercial SCO[c] (ppm)	Frequency Exceeding Commercial SCO
Metals					

Arsenic	ND to 49.6	13	2 out of 15	16	1 out of 15
Copper	ND to 2260	50	1 out of 15	270	1 out of 15
Lead	2.2 to 397	63	1 out of 15	1,000	0 out of 15
Mercury	ND to 0.431	0.18	1 out of 15	2.8	0 out of 15
SVOCs					
Benzo (b) fluoranthene	ND to 3.6	1	1 out of 15		
Chrysene	ND to 3.8	1	1 out of 15		
Indeno (1,2,3-cd) pyrene	ND to 0.89	0.5	1 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), Commercial Soil Cleanup Objectives.

Only two locations exhibited any exceedances of SCOs. Soil boring B-2 is located along the railroad tracks to the north of OU2 and B-12 is located in the paved parking lot west of OU2. No site-related subsurface soil contamination of concern above the commercial SCOs was identified during the RI. Therefore, no remedial alternatives need to be evaluated for subsurface soil. In addition, the remedy requires a minimum 1 foot thick soil cover or other barriers to prevent contact with subsurface soil.

Groundwater

The groundwater is observed at a depth of 6 to 9-feet below the surface in a 45 to 55-foot thick glacio-lacustrine sand and silt layer. Groundwater flow is from northeast to southwest. During the IRMs described in Section 5.2, wood block flooring was removed and sumps were emptied and cleaned. The concrete floors was subsequently examined and it was determined that spills or waste materials did not penetrate the floor. Therefore, no groundwater sampling was performed beneath the slab and was limited to the perimeter of the building. In the 2010, the building was demolished and the slab was removed. No evidence of contamination was found during this program. During the initial groundwater sampling program in 2005 ten (10) monitoring wells were installed around the perimeter of the OU2 and in the western court yard (see Figure 4). No PCBs or SVOCs were detected above SCGs in any of the groundwater samples. Metals contamination was detected in all samples. Groundwater sampling results are summarized in Table 1 below.

Table 3 - On-site Groundwater

Detected Constituents	Concentration Range Detected (ppb)[a]	SCG[b] (ppb)	Frequency Exceeding SCG
Metals			
Aluminum	345 to 73,200	100	10 out of 10
Arsenic	ND to 1810	3	3 out of 10
Chromium	ND to 136	50	2 out of 10
Cobalt	ND to 61.5	5	8 out of 10
Copper	ND to 3,400	200	3 out of 10

Iron	340 to 697,000	300	10 out of 10
Lead	ND to 2080	25	3 out of 10
Magnesium	14,200 to 48,600	35,000	2 out of 10
Manganese	44.8 to 7,580	300	9 out of 10
Nickel	ND to 144	100	3 out of 10
Sodium	9,560 to 261,000	20,000	9 out of 10
Vanadium	ND to 531	14	7 out of 10

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).

On-site groundwater has been impacted by metals contamination. This contamination is most likely attributed to the historic wire and metal manufacturing operations.

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.

Soil

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

Environmental Protection

Soil

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

FIGURE 1

Drawn By: PHE
Checked By: RWM
Project Mgr: RAK
Date: SEPT 2009
Project No: 00514.02

DRAWING TITLE
SITE LOCATION MAP

FORMER ROME CABLE CORPORATION
RIDGE STREET SITE
REMEDIAL INVESTIGATION/ALTERNATIVES ANALYSIS
CITY OF ROME NEW YORK

LEGEND

SS-01 456.02 — SOIL SAMPLE LOCATION (WITH GROUND SURFACE ELEVATION)

MW-01 366.32 — MONITORING WELL (WITH GROUND SURFACE ELEVATION)

0' 100' 200'

APPROXIMATE GRAPHIC SCALE

ERIE BLVD. WEST

NEW YORK CENTRAL RAILROAD

SOUTH JAY STREET

RIDGE STREET

WEST LOT

MW-01 424.58
SS-01 429.43
SS-20 430.11
SS-21 430.26
SS-23 432.06
SS-22 433.17
SS-18 428.75
SS-19 428.75
MW-14 429.21
SS-17 429.18
SS-16 429.18
MW-13 430.68
SS-02 428.39
MW-02 428.66
SS-03 428.22
MW-03 429.10
MW-04 429.39
SS-04 429.19
SS-12 428.75
SS-13 428.88
SS-14 428.77
SS-15 428.81
MW-12 428.23
MW-11S 425.53
MW-11D 425.59
MW-10 432.04
SS-10 429.50
SS-11 430.98
MW-09 430.86
MW-08D 430.70
MW-08S 430.70
SS-09 430.95
MW-07S 431.46
SS-08 431.65
MW-05 431.01
SS-05 430.46
SS-07 433.76
MW-06S 434.20
MW-06D 434.20
SS-06 434.72

14 6 4 5 30 15 2 23 20 22 11 18 21 19 1 16 26 12

DRAWING TITLE
EXTERIOR SAMPLE LOCATIONS

FIGURE 2

Drawn By: AJM
Checked By: WCN
Project Mgr: RAK
Date: SEPT 2009
Project No: 00514.02

FORMER ROME CABLE CORPORATION
RIDGE STREET SITE
REMEDIAL INVESTIGATION/ALTERNATIVES ANALYSIS
CITY OF ROME NEW YORK

LEGEND

SS-01 456.02 — SURFACE SOIL SAMPLE LOCATION (WITH GROUND SURFACE ELEVATION)

B-01 366.32 — MONITORING WELL (WITH GROUND SURFACE ELEVATION)

0' 100' 200'

APPROXIMATE GRAPHIC SCALE

B-01 424.58
SS-01 429.43
SS-20 430.11
SS-21 430.26
SS-23 432.06
SS-22 433.17
SS-18 428.75
SS-19 428.75
SS-17 429.18
SS-16 429.18
B-14 429.21
B-13 430.68
WEST LOT
SS-12 428.75
SS-13 428.88
SS-14 428.77
SS-15 428.81
B-12 428.2
B-11S 425.53
B-11D 425.59
B-10 432.04
SS-11 430.98
B-09 430.86
SS-10 429.50
SS-02 428.39
B-02 428.66
SS-03 428.22
B-03 429.10
B-04 429.39
SS-04 429.19
B-08D 430.70
B-08S 430.70
SS-09 430.95
B-07 431.46
SS-08 431.65
B-05 431.01
SS-05 430.46
SS-07 433.76
B-06S 434.20
B-06D 434.20
SS-06 434.72

ERIE BLVD. WEST

NEW YORK CENTRAL RAILROAD

SOUTH JAY STREET

RIDGE STREET

4 5 6 14 30 15 20 22 2 21 18 11 19 1 16 23 26 12

FIGURE 3

Drawn By: AJM
Checked By: WCN
Project Mgr: RAK
Date: SEPT 2009
Project No: 00514.02

DRAWING TITLE
EXTERIOR SAMPLE LOCATIONS

FORMER ROME CABLE CORPORATION
RIDGE STREET SITE
REMEDIAL INVESTIGATION/ALTERNATIVES ANALYSIS
CITY OF ROME NEW YORK

LEGEND

MW-4 (425.30) — SHALLOW MONITORING WELL (WITH GROUNDWATER ELEVATION) 4/19/2007

425 — SHALLOW GROUNDWATER COUNTOUR

GROUNDWATER FLOW DIRECTION

0' 100' 200'

APPROXIMATE GRAPHIC SCALE

ERIE BLVD. WEST

NEW YORK CENTRAL RAILROAD

NEW JAY STREET

RIDGE STREET

HENRY STREET

MW-1 (425.19)
MW-2 (N/A)
MW-3 (N/A)
MW-4 (425.30)
MW-5 (N/A)
MW-6S (426.88)
MW-7 (425.15)
MW-8S (N/A)
MW-9 (423.56)
MW-10 (422.75)
MW-11S (421.54)
MW-12 (422.60)
MW-13 (423.74)
MW-14 (N/A)
MW-15 (425.30)
MW-16 (425.19)
MW-17 (425.54)
MW-18 (424.92)
MW-19S (424.95)
MW-20 (424.99)
MW-23S (424.92)
MW-25S (424.95)
MW-26S (424.52)
MW-27S (425.42)
MW-28S (425.01)
MW-29S (423.54)
MW-30S (424.54)
MW-31S (424.17)
MW-32S (423.84)
MW-33S (422.39)
MW-34S (422.85)
MW-41S (N/A)

422
423
424
425
426

FIGURE 4

Drawn By: PHE
Checked By: RWM
Project Mgr: RAK
Date: SEPT 2009
Project No: 00514.02

DRAWING TITLE
APRIL 2007
GROUNDWATER CONTOUR MAP
SHALLOW

FORMER ROME CABLE CORPORATION
RIDGE STREET SITE
REMEDIAL INVESTIGATION/ALTERNATIVES ANALYSIS
CITY OF ROME NEW YORK

APPENDIX A

Responsiveness Summary

RESPONSIVENESS SUMMARY

Former Rome Cable Site
Operable Unit No. 2
Environmental Restoration Project
City of Rome, Oneida New York
Site No. E633053

The Proposed Remedial Action Plan (PRAP) for the Former Rome Cable 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 3, 2011. The PRAP outlined the No Further Action proposal for the Former Rome Cable 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 17, 2011, which included a presentation of the remedial investigation and the interim remedial measure conducted at the Former Rome Cable Site, Operable Unit No. 2, 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 22, 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 No. 1: Is the site ready for redevelopment?

Response No. 1: Once the Oneida County Industrial Development Agency has completed the required closeout procedures, including the completion of the site management plan and the environmental easement, the site will be ready for redevelopment in accordance with the approved documents; pursuant to applicable local and state requirements governing development of the site (e.g., zoning).

The following email comment was received from Mr. Ed Ingersoll, Safety/Security Administrator for PAR Technology/Rome Research Corporation. Mr. Ingersoll is an occupant of the PAR Building, which is adjacent to the Former Rome Cable Complex No. 1.

Comment No. 2: I currently work at 421 Ridge St. Rome NY and received a copy of the Fact Sheet (Feb 16) for the Former Rome Cable Site, Complex No. 3. In reading the fact sheet it identifies a contaminated groundwater plume that extends off-site into a commercial and residential area with vapor intrusion occurring in one off-site commercial building. My concern which commercial building is it? Since we are the closest commercial building to the original site, is it the

facility that I work in and if it is what is the concentration and the hazards associated with this exposure? The employees that were involved in the discussions with the remediation contractor have since moved on to new careers so I don't have any documentation that can answer my questions. Since I cannot attend the public comment this evening, I hope that you can answer my questions.

Response No. 2: The commercial building where vapor intrusion has been identified is the PAR Building. The NYSDEC and NYSDOH are willing to set up a meeting with the occupants of the PAR Building to discuss investigation findings and the proposed future work. Please note that the contaminated groundwater plume and soil vapor issue pertain to Operable Unit 1 of the Former Rome Cable site, where the remedial program is ongoing. The proposed remedy which is the subject of this Record of Decision is specific to Operable Unit No. 2, which pertains to Former Rome Cable Complex 3.

APPENDIX B

Administrative Record

Administrative Record

Former Rome Cable Site
Operable Unit No. 2
Environmental Restoration Project
City of Rome, Oneida New York
Site No. E633053

Proposed Remedial Action Plan for the Former Rome Cable Site, Operable Unit No. 2, Complex No. 3, dated February 2011, prepared by the Department.

Remedial Investigation/Alternative Analysis Report, Volume I through V, for the Former Rome Cable Corporation Site, dated September 2009, prepared by Shumaker Consulting Engineering & Land Surveying P.C.

Interim Remedial Measure Report, for the Former Rome Cable Corporation Site Complex # 3, dated December 2008, prepared by Shumaker Consulting Engineering & Land Surveying P.C.

Final Remedial Investigation/Alternative Analysis Work Plan for the Former Rome Cable Corporation Site, dated July 1, 2005, prepared by Shumaker Consulting Engineering & Land Surveying P.C.

Phase I Environmental Site Assessment, Rome Cable Corporation, dated August 1999, prepared by GZA Geo Environmental of New York.