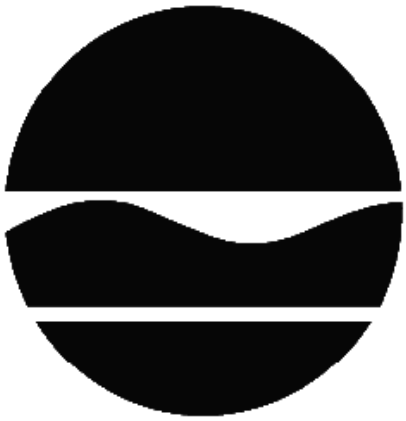
RECORD OF DECISION

Former Rome Cable Site, Parcels 3, 5 and 6
Operable Unit Number 01: Remedial Investigation
Program Western Portion of Parcel 5
Environmental Restoration Project
Rome, Oneida County
Site No. E633073
March 2013



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

DECLARATION STATEMENT - RECORD OF DECISION

Former Rome Cable Site, Parcels 3, 5 and 6
Operable Unit Number: 01
Environmental Restoration Project
Rome, Oneida County
Site No. E633073
March 2013

Statement of Purpose and Basis

This document presents the remedy for Operable Unit Number: 01: Remedial Investigation Program Western Portion of Parcel 5 of the Former Rome Cable Site, Parcels 3, 5 and 6 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: 01 of the Former Rome Cable Site, Parcels 3, 5 and 6 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

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, 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 gas 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. On-site soils which exceed commercial soil cleanup objectives (SCOs) will be excavated and transported off-site for disposal. Backfill 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). Soil will be excavated to address the identified contaminants from the following areas

- Approximately 800 cubic yards of PCB contaminated soils will be removed from the area west of Building 29. This area is on the northwest side of OU1 and Parcel 5.
- Approximately 600 cubic yards of petroleum contaminated soils in the vicinity of the horizontal wire coating drip line will be removed from the area between Building 28C and 29. This area is on the north east side of OU1 and Parcel 5.

3. Site Cover. A site cover will be required to allow for commercial use of the site. The cover will consist either of the structures such as buildings, pavement, sidewalks comprising the site development 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).

4. Institutional Control. Imposition of an institutional control in the form of an environmental easement for the controlled property that:

- requires 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);
- allows the use and development of the controlled property for commercial and industrial uses as defined by Part 375-1.8(g), although land use is subject to local zoning laws; and
- requires compliance with the Department approved Site Management Plan.

5. 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 above.
Engineering Controls: The soil cover discussed above.
This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- descriptions of the provisions of the environmental easement including any land use and groundwater use restrictions;
- 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.

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.

March 30,2013
Date

Robert W. Schick, P.E., Director
Division of Environmental Remediation

RECORD OF DECISION

Former Rome Cable Site, Parcels 3, 5 and 6
Rome, Oneida County
Site No. E633073
March 2013

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), 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 remedy is intended to attain the remedial action objectives identified for this site for the protection of public health and the environment. This Record of Decision (ROD) identifies the selected remedy, summarizes the other alternatives considered, and discusses the reasons for selecting the remedy.

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: CITIZEN PARTICIPATION

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:

Jervis Public Library

613 North Washington Street
Rome, NY 13441
Phone: (315) 336-4570

A public meeting was also conducted. At the meeting, the findings of the remedial investigation (RI) and the alternatives analyses (AA) were presented along with a summary of the proposed remedy. After the presentation, a question-and-answer period was held, during which verbal or written comments were accepted on the proposed remedy.

Comments on the remedy received during the comment period are summarized and addressed in the responsiveness summary section of the ROD.

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, Voluntary 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.ny.gov/chemical/61092.html.

SECTION 3: SITE DESCRIPTION AND HISTORY

Location: The Former Rome Cable Site Parcels 3, 5 and 6 is 49.65 acres in size and is located in the City of Rome, Oneida County, New York. The site is located on the southwestern side of the City of Rome, between Erie Boulevard to the north and the Erie Canal to the south. The site is located south of Henry Street and the Rome Strip Steel Corporation, west of Jay Street and east of a former railroad line.

Site Features: The western portion of the site, which is part of Parcel 5, contains site buildings consisting of Building 29 (horizontal insulation extrusion line) and Building 3, a barn used for storage (former Farm). The area surrounding the buildings is heavily vegetated and slopes toward the northeast. The northern and eastern portions of the site are where the majority of the manufacturing occurred and includes buildings used for manufacturing, coating, storing and shipping wire. The eastern portion of the site, which is comprised of Parcel 3 and the eastern side of Parcel 5, includes Former Building 13 (storage), Building 17 (dry plastic resin storage hoppers and shipping), Building 20 (wire spooling and insulation extrusion), Building 22 (warehouse and shipping), Building 24 (storage), Building 25 (basement plasticizer storage tanks, first floor dry plastic resin rail car receiving) and Building 28C (horizontal insulation extrusion line). The southern and southeastern areas are covered with broken asphalt pavement, roads, and rail lines that were used for storing and shipping wire reels. Parcel 6 is on the western side of Parcel 3 and is a utility corridor running north and south. Parcel 6 borders Parcel 3 to the west and south and is a utility corridor for overhead lines and access to a substation near the southwest corner of Parcel 3.

Current Zoning/Use: The entire site is zoned industrial and is in an Empire Development Zone. The site is owned by the Oneida County Industrial Development Agency and is currently unoccupied.

Historic Use: The Rome Cable facility has been used for manufacturing and spinning wire since the 1930s. The majority of the buildings located on parcels 3, 5 and 6 were constructed during the 1950s and 1960s. The primary environmental concerns associated with the site include hazardous and non-hazardous industrial liquids, which were used in the spinning and coating of wire, petroleum used to heat the on-site furnaces and as lubricants in equipment, and asbestos containing material.

Operable Units: The site is divided into two operable units (OUs). The western portion of the site is designated as OU1 and is a heavily wooded area. A large barn (Building 3) and the wire coating building (Building 29) are located on the northwest side of OU1. OU1 is the western portion of Parcel 5 and is approximately 30 acres in size. The eastern portion of the site is designated as OU2 and is covered with buildings, broken pavement, railroad lines and roadways. This area is relatively flat and was the main manufacturing area. OU2 is comprised of the eastern portion of Parcel 5 and all of Parcel 3. OU2 is approximately 20 acres in size.

Site Geology and Hydrogeology: Except for the wooded area in OU1, the surface of the site consists of historic fill to depths of three to seven feet below ground surface. The fill is underlain by several different soil layers ranging from gravel to clay. Bedrock lies approximately seventy-eight feet below grade. The depth of groundwater ranges from six to nine feet below the surface and flows to the southeast towards the Barge Canal.

Operable Unit (OU) Number 01 is the subject of this document.

A Record of Decision will be issued for OU 02 in the future.

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 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 included in the Tables for the media being evaluated in Exhibit A.

SECTION 5: 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.

The site was historically owned by Rome Cable, H.T. Dyett, General Cable Corporation, Alcoa, Cyprus Mines Corporation, and several private investors and corporations.

Since viable PRPs have been identified, legal action may be initiated at a future date by the State to recover State response costs. The Oneida County IDA will assist the State in its efforts by providing all information to the state which documents PRPs. Oneida County will also not enter into any agreement regarding response costs without the approval of the Department.

SECTION 6: SITE CONTAMINATION

6.1: 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.

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

6.1.2: RI Results

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:

PCB-AROCLOR 1254	BENZO(B)FLUORANTHENE
BENZ(A)ANTHRACENE	DIBENZ[A,H]ANTHRACENE
BENZO(A)PYRENE	Petroleum Products

As illustrated in Exhibit A, 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 Record of Decision.

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

6.3: 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 the remedial investigation conducted seven areas of concern have been identified in OU1 and OU2. The two areas of concern identified in OU1 (western portion of parcel 5) that require remediation include the PCB impacted area and the horizontal wire coating drip line area. These two areas of concern under OU1 are located on the northwestern portion of Parcel 5. The primary contaminants of concern in soil for OU1 are semi-volatile organic compounds and

PCBs. No groundwater contamination has been documented in OU1. The majority of the OU1 area had no documented industrial use and no documented impacts based on historic files, site inspection and sampling. The majority of OU1 is wooded with little development.

Five areas of concern have been identified in OU2 that require remediation, which include the main manufacturing buildings, the phthalate impacted area, the petroleum impacted area, the acetone impacted area, and the demolition debris area. These five areas of concern are located on the eastern portion of Parcel 5 and all of Parcel 3. The primary contaminants of concern in the soil and groundwater for OU2 are volatile organic compounds, semi-volatile organic compounds, metals and PCBs. Due to the extensive development across OU2 no ecological resources exist and therefore, no ecological resources have been impacted other than groundwater.

6.4: 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.*

Operable Unit 1 (OU1): The area comprising OU1 is not fenced and persons who enter this area could contact contaminants in the soil by walking on the soil, digging or otherwise disturbing the soil. Operable Unit 2 (OU2): The area comprising OU2 is not fenced and persons who enter this area could contact contaminants in the soil by walking on the soil, digging or otherwise disturbing the soil. Contaminated groundwater at OU2 is not used for drinking or other purposes and the site is served by a public water supply that obtains water from a different source not affected by this contamination. Volatile organic compounds in the soil or 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. The potential exists for the inhalation of site contaminants due to soil vapor intrusion for any future on-site redevelopment and occupancy for this operable unit. Off-site soil vapor intrusion was evaluated and is being addressed as part of the remediation of the Former Rome Cable site (site #E633053).

6.5: 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 action objectives for this site are:

Soil

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.

SECTION 7: SUMMARY OF THE SELECTED REMEDY

To be selected the remedy must be protective of human health and the environment, be cost-effective, comply with other statutory requirements, and utilize permanent solutions, alternative technologies or resource recovery technologies to the maximum extent practicable. The remedy must also attain the remedial action objectives identified for the site, which are presented in Section 6.5. Potential remedial alternatives for the Site were identified, screened and evaluated in the alternatives analysis (AA) report.

A summary of the remedial alternatives that were considered for this site is presented in Exhibit B. Cost information is presented in the form of present worth, which represents the amount of money invested in the current year that would be sufficient to cover all present and future costs associated with the alternative. This enables the costs of remedial alternatives to be compared on a common basis. As a convention, a time frame of 30 years is used to evaluate present worth costs for alternatives with an indefinite duration. This does not imply that operation, maintenance, or monitoring would cease after 30 years if remediation goals are not achieved. A summary of the Remedial Alternatives Costs is included as Exhibit C.

The basis for the Department's remedy is set forth at Exhibit D.

The selected remedy is referred to as the Excavation and Off-Site Disposal remedy.

The estimated present worth cost to implement the remedy is $239,000. The cost to construct the remedy is estimated to be $239,000 and the estimated average annual cost is $0.

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, 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 gas 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. On-site soils which exceed commercial soil cleanup objectives (SCOs) will be excavated and transported off-site for disposal. Backfill 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). Soil will be excavated to address the identified contaminants from the following areas
• Approximately 800 cubic yards of PCB contaminated soils will be removed from the area west of Building 29. This area is on the northwest side of OU1 and Parcel 5.
• Approximately 600 cubic yards of petroleum contaminated soils in the vicinity of the horizontal wire coating drip line will be removed from the area between Building 28C and 29. This area is on the north east side of OU1 and Parcel 5.

3. Site Cover. A site cover will be required to allow for commercial use of the site. The cover will consist either of the structures such as buildings, pavement, sidewalks comprising the site development 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).

4. Institutional Control. Imposition of an institutional control in the form of an environmental easement for the controlled property that:
• requires 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);
• allows the use and development of the controlled property for commercial and industrial uses as defined by Part 375-1.8(g), although land use is subject to local zoning laws; and
• requires compliance with the Department approved Site Management Plan.

5. 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 above.
Engineering Controls: The soil cover discussed above.
This plan includes, but may not be limited to:
• an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
• descriptions of the provisions of the environmental easement including any land use and groundwater use restrictions;

- 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.

Exhibit A
Former Rome Cable Site, Parcels 3, 5 and 6
OPERABLE UNIT NO. 1 – Western Portion

Nature and Extent of Contamination

This section describes the findings of the Remedial Investigation for all environmental media that were evaluated. As described in Section 6.1, samples were collected from various environmental media to characterize the nature and extent of contamination.

For each medium, a table summarizes the findings of the investigation. The tables present the range of contamination found at the site in the media and compares the data with the applicable SCGs for the site. The contaminants are arranged into four categories; volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), pesticides/ polychlorinated biphenyls (PCBs), and inorganics (metals and cyanide). For comparison purposes, the SCGs are provided for each medium that allows for unrestricted use. For soil, if applicable, the Restricted Use SCGs identified in Section 6.1.1 are also presented. The western portion of the site is designated as OU1 and is a heavily wooded area. A large barn (Building 3) and the wire coating building (Building 29) are located on the northwest side of OU1. OU1 is the western portion of Parcel 5 and is approximately 30 acres in size (Figures 2 & 3).

Waste/Source Areas

As described in the RI report, waste/source materials were identified at the site and are impacting surface soils.

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 medium. Wastes and Source areas were identified on OU1, Parcel 5 which include the PCB impact area and the drip line impact area. The PCB impact was created when PCB containing equipment was cut up for disposal and the equipment reservoirs were emptied. The drip line impact was created when lubricating oil from the horizontal drip line was routinely lost to the surface soils. The waste/source areas identified will be addressed in the remedy selection process (Figure 4).

Groundwater

No site-related groundwater contamination of concern was identified during the RI for OU1. Therefore, no remedial alternatives need to be evaluated for groundwater.

Surface Soil

Surface soil samples were collected from many locations across OU1to evaluate background concentrations, overall surface soil conditions and to delineate known areas of impacts. These samples were analyzed for semi-volatile organic compounds VOCs, SVOCs, PCBs/pesticides and metals. The results of the surface soil sampling program are presented below:

Table 2 - Surface Soil

Detected Constituents	Concentration Range Detected (ppm)[a]	Unrestricted SCO[b] (ppm)	Frequency Exceeding Unrestricted SCO	Restricted Use Commercial SCO[c] (ppm)	Frequency Exceeding Restricted SCO
SVOCs					
Benzo(a)anthracene	ND – 18	1	6 out of 42	5.6	6 out of 42
Benzo(a)pyrene	ND – 3.4	1	7 out of 42	1	7 out of 42
Benzo(b)fluoranthene	ND – 22	1	5 out of 42	1	5 out of 42
Dibenzo(a,h)anthracene	ND – 0.7	0.33	2 out of 42	0.56	2 out of 42
Pesticides/PCBs					
Aroclor 1254	ND – 63	0.1	7 out of 42	1	7 out of 42

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 Use Soil Cleanup Objectives for the Protection of Public Health for Commercial Use, unless otherwise noted.

SVOCs were detected above Part 375 Commercial SCOs in surface soil samples from beneath the former horizontal wire coating line between Building 28B and Building 29C and along the access road to Building 29. The elevated levels of SVOCs along the access road are with asphalt.

Total PCB concentrations in excess of the NYSDEC Part 375 Commercial SCOs of 1 ppm were reported in surface soil samples collected from the equipment decommissioning area west of Building 29. PCB concentrations, above the SCOs, ranged from 1.6 to 63 ppm in this area. The 63 ppm PCB concentration detected in one (1) sample from this area exceeds the Toxic Substance Control Act (TSCA) hazardous waste threshold of 50 ppm. The extent of surface soil PCB impacts exceeding the ES-3 Commercial SCOs of 1.0 ppm cover an area of approximately 200-feet by 100-feet (See Figure 5).

Data for subsurface soil in the PCB-impacted area indicates that impacts are restricted to the near surface soil (<2 fbg). The estimated volume of PCB-impacted soil exceeding the 1.0 ppm SCOs is 1,500 cubic yards.

No VOCs above NYSDEC Part 375 unrestricted SCOs were reported in any of the 18 surface soil samples collected for VOC analysis.

Based on the findings of the Remedial Investigation, the past disposal of hazardous waste and the presence of petroleum based wire drawing solutions and PCB contaminated fluids have resulted in the contamination of soil. The site contaminants identified in soil which are considered to be the primary contaminants of concern, to be addressed by the remedy selection process are, SVOCs and PCBs. The RI findings support that the soil contamination in OU1 is limited to two areas (i.e., PCB Impacted Area, Horizontal Wire Coating Drip Line Area) as depicted on Figure 4.

Sub-Surface Soils

Sub-surface soil samples were collected from many locations across OU1to evaluate concentrations, overall sub-surface soil conditions and to delineate known areas of impacted. These samples were analyzed for semi-volatile organic compounds VOCs, SVOCs, PCBs/pesticides and metals. No site-related sub-surface

contamination of concern was identified during the RI for OU1. Therefore, no remedial alternatives need to be evaluated for sub-surface soils.

Soil Vapor

Based on the concentration detected in site soils and groundwater, and in comparison with the NYSDOH Soil Vapor Intrusion Guidance, no site-related soil vapor contamination of concern was identified during the RI. Therefore, no remedial alternatives need to be evaluated for soil vapor.

Exhibit B
Former Rome Cable Site, Parcels 3, 5 and 6
OPERABLE UNIT NO. 1 – Western Portion

Description of Remedial Alternatives

The following alternatives were considered based on the remedial action objectives (see Section 6.5) to address the contaminated media identified at the site as described in Exhibit A. The Alternatives have been broken down by contaminated media and area of concern.

OPERABLE UNIT NO. 1

PCB Impacted Area Soils

Alternative 1A: No Action

The No Action Alternative is evaluated as a procedural requirement and as a basis for comparison. This alternative leaves the site in its present condition and does not provide any additional protection to public health and the environment.

Alternative 1B: Capping and Site Management

The Capping alternative requires capping of PCB contaminated soils and implementing institutional controls for this area of the site. This alternative includes engineering controls in the form of a cap and institutional controls, in the form of an environmental easement and a site management plan, necessary to protect public health and the environment from any contamination identified at the site. Where a 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 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.

Present Worth: …….……. $44,000
Capital Cost:.....$25,300
Annual Costs (Year 1): …….…… $1,000

Alternative 1C: Excavation and Off-Site Disposal

This alternative achieves all of the SCGs discussed in Section 6.1.1 and Exhibit A and soil meets the commercial use soil cleanup objectives listed in Part 375-6.8 (a). This alternative would include the excavation and removal for proper disposal approximately 800 cubic yards of hazardous and non-hazardous PCB impacted soils. Delineation of the extent of contamination to be removed is a component of the remedial design. 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).

Present Worth: ……. $154,000
Capital Cost:.....$154,000
Annual Costs (Year 1): …… $0

Horizontal Wire Coating Drip Line Area Soils

Alternative 2A: Capping and Site Management

The Site Management Alternative requires capping of petroleum contaminated soils and implementing institutional controls for this area of the site. This alternative includes engineering controls in the form of a cap and institutional controls, in the form of an environmental easement and a site management plan, necessary to protect public health and the environment from any contamination identified at the site. Where a 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 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.

Present Worth: …….. $44,000
Capital Cost:.....$25,300
Annual Costs (Year 1): ……..… $1,000

Alternative 2B: Excavation and Off-Site Disposal

This alternative achieves all of the SCGs discussed in Section 6.1.1 and Exhibit A and soil meets the commercial soil cleanup objectives listed in Part 375-6.8 (a). This alternative would include the excavation and removal for proper disposal approximately 600 cubic yards of petroleum impacted soils (Figure 4). Delineation of the extent of contamination to be removed is a component of the remedial design. 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).

Present Worth: …….……. $85,000
Capital Cost:.....$85,000
Annual Costs (Year 1): ……..…… $0

Exhibit C
Former Rome Cable Site, Parcels 3, 5 and 6
OPERABLE UNIT NO. 1 – Western Portion

Remedial Alternative Costs

Remedial Alternative	Capital Cost ($)	Annual Costs ($)	Total Present Worth ($)
Operable Unit - 1			
1A - PCB Impacted Soil Area No Action	0	0	0
1B - PCB Impacted Soil Area Soil Cover and Site Management	25,300	1,000	44,000
1C - PCB Impacted Soil Area Soil Removal & Off-Site Disposal	154,000	0	154,000
2A – Horizontal Wire Coating Drip Line Area Soil Cover and Site Management	25,300	1,000	44,000
2B - Horizontal Wire Coating Drip Line Area Soil Removal & Off-Site Disposal	85,000	0	85,000
Total Remedy (1C and 2B)	**239,000**	**0**	**239,000**

Exhibit D
Former Rome Cable Site, Parcels 3, 5 and 6
OPERABLE UNIT NO. 1 – Western Portion

SUMMARY OF THE SELECTED REMEDY

The Department is selecting Alternatives:
1C – PCB Impacted Area of Concern, (OU1-Parcel 5) Soil Removal with Off-Site Disposal;
2B – Horizontal Wire Coating Drip Line Area of Concern (OU1-Parcel 5), Soil Removal with Off-site Disposal, as the remedy for the site.

These alternatives will achieve the remediation goals for the site by removing soils impacted with PCBs and semi-volatile organics. The elements of this remedy are described in Section 7.

Basis for Selection

The selected remedy is based on the results of the RI and the evaluation of alternatives. The criteria to which potential remedial alternatives are compared are defined in 6 NYCRR Part 375. A detailed discussion of the evaluation criteria and comparative analysis is included in the RI/AA report.

The first two evaluation criteria are termed "threshold criteria" and must be satisfied in order for an alternative to be considered for selection.

1. Protection of Human Health and the Environment. This criterion is an overall evaluation of each alternative's ability to protect public health and the environment.

The selected remedy comprised of excavation and off-site disposal (Alternatives 1C and 2B) would satisfy this criterion. Alternatives 1C and 2B remove contaminated soils for off-site disposal. The other alternatives provide a slightly lesser degree of protection by leaving contamination untreated.

2. Compliance with New York State Standards, Criteria, and Guidance (SCGs). Compliance with SCGs addresses whether a remedy will meet environmental laws, regulations, and other standards and criteria. In addition, this criterion includes the consideration of guidance which the Department has determined to be applicable on a case-specific basis. The selected Alternatives 1C and 2B comply with SCGs to the extent practicable. Alternatives 1C and 2B address source areas of contamination and comply with the commercial use soil cleanup objectives. Alternative 1B does not comply with this criterion because it leaves hazardous waste in-place. Alternative 2A also complies with this criterion through use of a soil cover. Because Alternatives 1C and 2B satisfy the threshold criteria, the remaining criteria are particularly important in selecting a final remedy for the site.

The next six "primary balancing criteria" are used to compare the positive and negative aspects of each of the remedial strategies.

3. Long-term Effectiveness and Permanence. This criterion evaluates the long-term effectiveness of the remedial alternatives after implementation. If wastes or treated residuals remain on-site after the selected remedy has been implemented, the following items are evaluated: 1) the magnitude of the remaining risks, 2) the adequacy of the engineering and/or institutional controls intended to limit the risk, and 3) the reliability of these controls.

Long-term effectiveness is best accomplished by those alternatives involving excavation of the contaminated overburden soils (Alternatives 1C and 2B).

4. Reduction of Toxicity, Mobility or Volume. Preference is given to alternatives that permanently and significantly reduce the toxicity, mobility or volume of the wastes at the site.

Alternatives 1C and 2B reduce toxicity, mobility or volume by permanently removing or treating contamination. The remaining alternatives do not provide for reduction of toxicity, mobility or volume; however they do effectively manage low level contamination on-site.

5. Short-term Impacts and Effectiveness. The potential short-term adverse impacts of the remedial action upon the community, the workers, and the environment during the construction and/or implementation are evaluated. The length of time needed to achieve the remedial objectives is also estimated and compared against the other alternatives.

Alternatives 1C and 2B all have short term impacts which can be easily controlled through construction techniques and engineering controls. Alternatives 1 B and 2A are also considered effective through the use of a soil cover.

6. Implementability. The technical and administrative feasibility of implementing each alternative are evaluated. Technical feasibility includes the difficulties associated with the construction of the remedy and the ability to monitor its effectiveness. For administrative feasibility, the availability of the necessary personnel and materials is evaluated along with potential difficulties in obtaining specific operating approvals, access for construction, institutional controls, and so forth.

All alternatives are readily implementable.

7. Cost-Effectiveness. Capital costs and annual operation, maintenance, and monitoring costs are estimated for each alternative and compared on a present worth basis. Although cost-effectiveness is the last balancing criterion evaluated, where two or more alternatives have met the requirements of the other criteria, it can be used as the basis for the final decision.

The costs of the alternatives do not vary significantly. Alternatives which include leaving contamination in place and monitoring have the lowest cost, but the contaminated soil would not be addressed other than by institutional controls. The alternatives which require excavation or treatment have a higher cost (1C and 2B). However the long-term management of these wastes is mitigated.

8. Land Use. When cleanup to pre-disposal conditions is determined to be infeasible, the Department may consider the current, intended, and reasonable anticipated future land use of the site and its surroundings in the selection of the soil remedy.

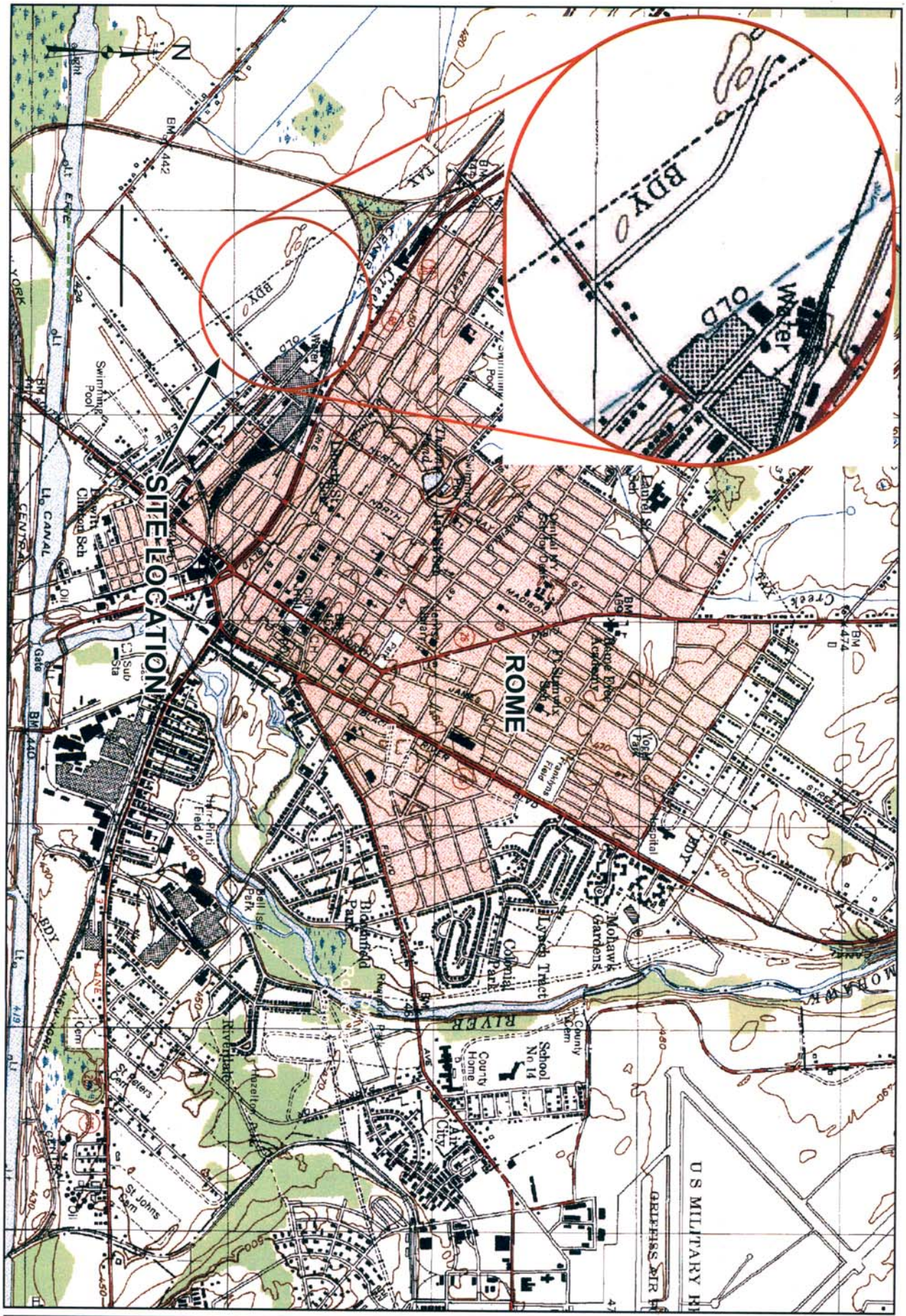
Since the anticipated use of the site is commercial, alternatives that leave contamination in place and untreated are the least desirable because they would limit the future of the site, whereas Alternatives1C and 2B would remove the contaminated soil permanently.

The final criterion, Community Acceptance, is considered a "modifying criterion" and is taken into account after evaluating those above. It is evaluated after public comments on the selected Remedial Action Plan have

been received.

9. Community Acceptance. Concerns of the community regarding the investigation, the evaluation of alternatives, and the PRAP were evaluated. The attached Responsiveness Summary was prepared that describes public comments received and the manner in which the Department addressed the concerns raised.

Alternatives 1C and 2B are being selected because, as described above, they satisfy the threshold criteria and provide the best balance of the balancing criterion.

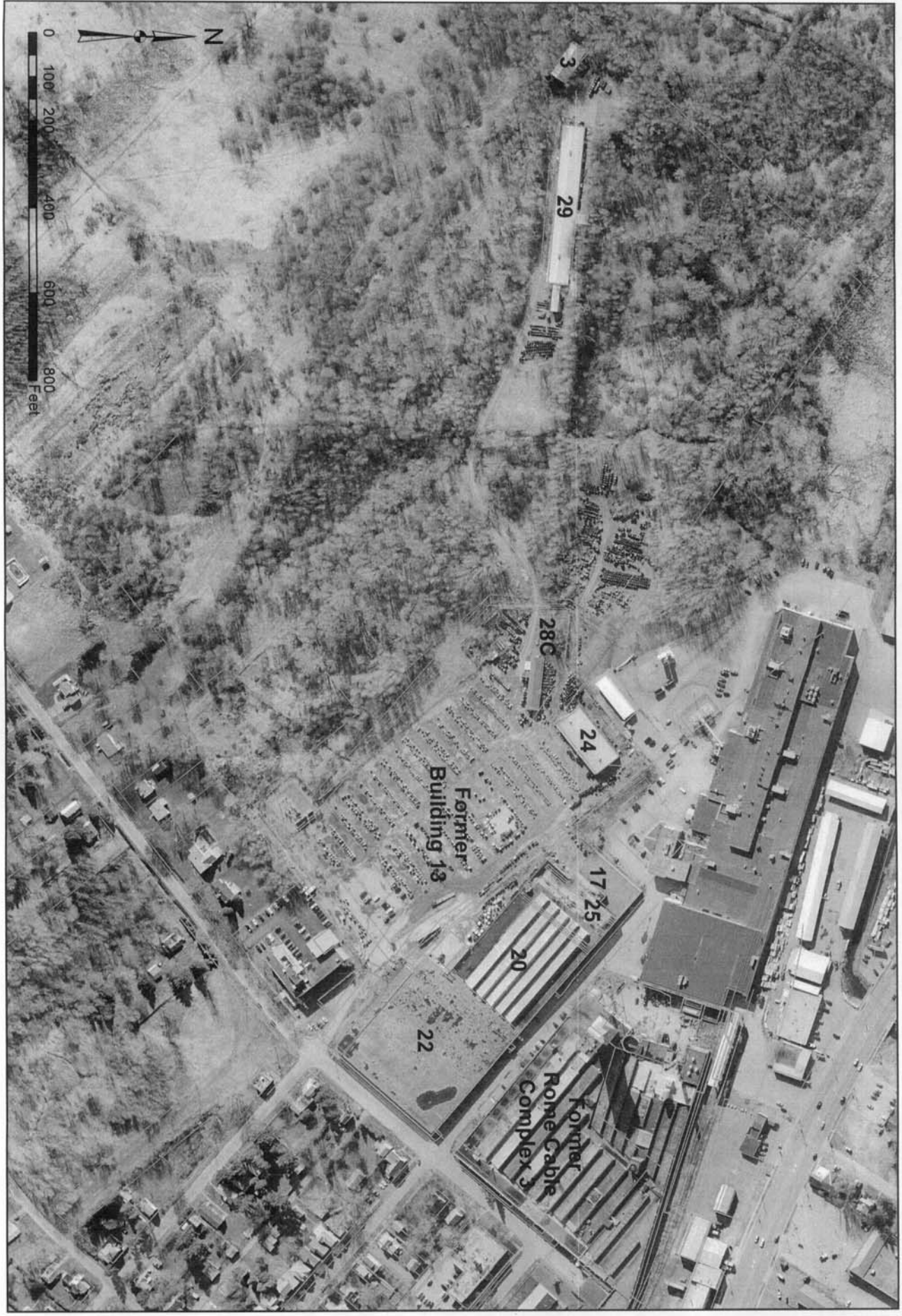


SHUMAKER
Consulting Engineering & Land Surveying, P.C.
430 Court Street, Utica, NY 13502
phone (315)724-0100 fax (315)724-3715

Former Rome Cable Corporation
Parcels 3, 5 and 6
Remedial Investigation/Alternatives Analysis
SITE LOCATION MAP
City of Rome New York

Drawn By:	AMU
Checked By:	RAK
Project Mgr:	DEB
Date:	1/31/2011
Project No.:	07046.02

Figure
1



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Former Rome Cable Corporation
Parcels 3, 5 and 6
Remedial Investigation/Alternatives Analysis
SITE PLAN

City of Rome New York

Drawn By:	AJM
Checked By:	RAK
Project Mgr:	DEB
Date:	1/31/2011
Project No.:	07046.02

Figure
2

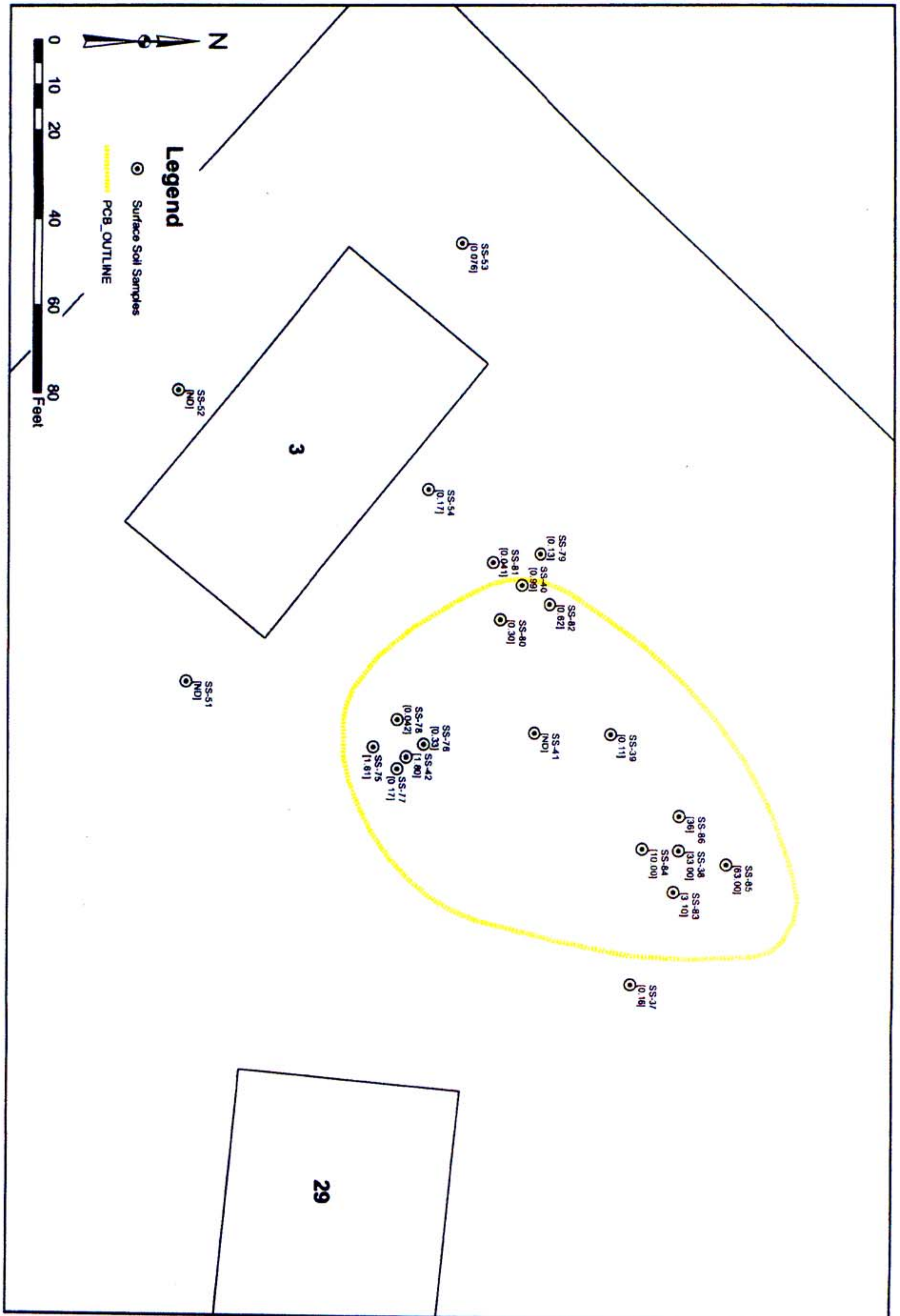
Former Rome Cable Corporation
Proposed Remedial Action Plan

OU1 - Western Portion - Parcel 5
OU2 - Eastern Portion - Parcel 3, 5 & 6

Figure 3
Operable Units

Former Rome Cable Corporation Operable Unit No. 1 - Western Portion of Parcel No. 5
Proposed Remedial Action Plan

Figure 4
Areas of Concern



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Former Rome Cable Corporation
Parcels 3, 5 and 6
Remedial Investigation/Alternatives Analysis
PCB-IMPACTED SOIL AREA

City of Rome New York

Drawn By:	AJM
Checked By:	RAK
Project Mgr:	DEB
Date:	1/31/2011
Project No.:	07046.02

Figure 5

APPENDIX A

Responsiveness Summary

RESPONSIVENESS SUMMARY

Former Rome Cable Site, Parcels 3, 5 & 6
Operable Unit No. 1: Western Portion
Environmental Restoration Project
Oneida County Industrial Development Agency, Rome, New York
Site No. E633072

The Proposed Remedial Action Plan (PRAP) for the Former Rome Cable Site, Parcels 3, 5 & 6site 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 13, 2013. The PRAP outlined the remedial measure proposed for the contaminated soil and groundwater at the Former Rome Cable Site, Parcels 3, 5 & 6 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 March 12, 2013, which included a presentation of the remedial investigation and alternative analysis (RI/AA) for the Former Rome Cable Site, Parcels 3, 5 & 6 site 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 29, 2013.

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: When will the site be ready for reuse?

RESPONSE 1: The Department plans to issue the Record of Decision (ROD) by March 31, 2013. At this time, however, there is no definitive schedule for remediation because funding for Environmental Restoration Program (ERP) projects is currently limited. Remediation could take place in the future if funding becomes available in the ERP or if the site can enter another State or Federal program. Private funding could also be used to remediate the site.

COMMENT 2: Would the placement of solar panels be considered equivalent to a soil cover?

RESPONSE 2: The use of solar panels and associated foundation structures and access roads would have to be evaluated to determine if they meet the ROD criteria for a site cover. These criteria include structures such as buildings, pavement, sidewalks that cover the site soil or a minimum one-foot soil cover placed over a demarcation in areas where the upper one foot of exposed surface soil exceed the soil cleanup objectives (SCOs) for commercial use.

Comment 3: Which operable unit will be ready first?

Response 3: Based on the availability of funding, either operable unit could be made ready for reuse. Operable Unit No. 1 (Western Portion) has fewer areas of concern, less contamination and a lower cost to implement compared to Operable Unit No. 2 (Eastern portion).

Comment 4: Who is responsible for the current and future costs?

Response 4: Potentially Responsible Parties (PRPs) are those who may be legally liable for contamination at a site, and may include past or present owners and operators, waste generators, and haulers. The site was historically owned by Rome Cable, H.T. Dyett, General Cable Corporation, Alcoa, Cyprus Mines Corporation, and several private investors and corporations. Any or all of these entities could be pursued to recover costs. New York State does not provide ERP funding for the post-construction (site management) phase of site remedial programs.

APPENDIX B

Administrative Record

Administrative Record

Former Rome Cable Site, Parcels 3, 5 & 6
Operable Unit No. 1: Western Portion
Environmental Restoration Project
Oneida County Industrial Development Agency, Rome, New York
Site No. E633072

1. *Proposed Remedial Action Plan for the Former Rome Cable Site, Parcels 3, 5 & 6 site, Operable Unit No. 1 – Western Portion dated February 2013*, prepared by the Department.

2. Remedial Investigation/Alternative Analysis Report for the Former Rome Cable Site, Parcels 3, 5 & 6, dated November 2011, prepared by Shumaker Consulting, Engineering and Land Surveyors, P.C..

3. The Department and the Oneida County Industrial Development Agency entered into a State Assistance Contract, Contract No. C303911, dated February 25, 2009.

4. The Department and the Oneida County Industrial Development Agency entered into a State Assistance Contract Amendment No. 1, Contract No. C303911, dated September 21, 2010.

5. The Department and the Oneida County Industrial Development Agency entered into a State Assistance Contract Amendment No. 2, Contract No. C303911, dated September 11, 2012.

6. The Remedial Investigation/Alternatives Analysis Work Plan for the Former Rome Cable Site, Parcels 3, 5 & 6, dated December 20, 2007, prepared by Shumaker Consulting, Engineering and Land Surveyors, P.C.