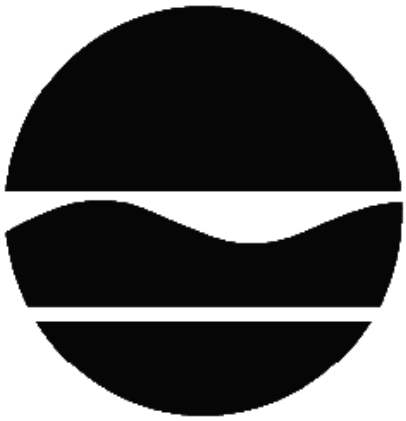
RECORD OF DECISION

Former Rome Cable Site, Parcels 3, 5 and 6
Operable Unit Number 02: Remedial Investigation
Program Eastern Portion - Parcels 3, 5 and 6
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: 02
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: 02: Remedial Investigation Program Eastern Portion - Parcels 3, 5 and 6 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: 02 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 protection of groundwater soil cleanup objectives (SCOs) will be excavated and transported off-site for disposal at a permitted facility. 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 260 cubic yards of petroleum impacted soils from the petroleum impacted area of concern (AOC) in the vicinity of Building 20 will be removed; and
- Approximately 480 cubic yards of phthalate impacted soils will be removed from the phthalate impacted AOC south of Building 17.

3. Consolidation. Debris and contaminated soils impacted with SVOCs above commercial use SCOs identified in the Demolition Debris Fill AOC will be consolidated and covered by the soil cover. The consolidated material will be covered with sufficient backfill to allow placement of the demarcation layer and soil cover.

4. 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).

5. Treatment. The acetone contamination found in the soil beneath the parking lot in the vadose zone of the acetone impacted AOC will be biologically treated through mechanical aeration. A pilot test will be conducted in this AOC to evaluate the best method to mechanically aerate the acetone impacted soils found beneath the parking lot and other barrier material (i.e., concrete). The full scale operation will commence following the pilot test. The operation of the components of the remedy would continue until the remedial objectives have been achieved, or until the Department determines that continued operation is technically impracticable or not feasible. Mechanical aeration will ensure that all visual, olfactory and photo-ionization detector readings are mitigated. Confirmation testing will be conducted to ensure that the protection of groundwater SCOs are achieved. A community air monitoring program will be implemented to ensure the protection of the community during the mechanical aeration process.

6. Waste Removal. All waste identified in on-site buildings of the main manufacturing buildings AOC will be characterized and disposed or recycled at approved and permitted off-site facilities, including, but not limited to, oil-containing transformers, paint containers, propane cylinders, fluorescent lights and ballasts, petroleum products, batteries, mercury containing devices, asbestos containing materials, oil soaked wood block flooring and phenolic compounds used in the wire coating process.

7. 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;
- restricts the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County DOH;
- prohibits agriculture or vegetable gardens on the controlled property; and
- requires compliance with the Department approved Site Management Plan.

8. 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;
- a provision for evaluation of the potential for soil vapor intrusion for any buildings developed on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
- 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.

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

- monitoring of soil and groundwater to assess the performance and effectiveness of the remedy;
- a schedule of monitoring and frequency of submittals to the Department;

monitoring for vapor intrusion for any buildings occupied or developed on the site, as may be required by the Institutional and Engineering Control Plan discussed in item above.

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 02 is the subject of this document.

A Record of Decision will be issued for OU 01 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:

BENZO(A)PYRENE	COPPER
BENZO(B)FLUORANTHENE	LEAD
BENZO[K]FLUORANTHENE	ACETONE
Chrysene	METHYL-TERT-BUTYL ETHER (MTBE)
DIBENZ[A,H]ANTHRACENE	1,2-DICHLOROETHANE
FLUORANTHENE	TRICHLOROETHENE (TCE)
indeno(1,2,3-cd)pyrene	BIS(2-ETHYLHEXYL)PHTHALATE
PHENANTHRENE	NAPHTHALENE
PYRENE	PHENOL
BENZ(A)ANTHRACENE	Petroleum Products

As illustrated in Exhibit A, the contaminant(s) of concern exceed the applicable SCGs for:

- groundwater
- soil

6.2: Interim Remedial Measures

An interim remedial measure (IRM) is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before issuance of the 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 02.

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:

Groundwater

RAOs for Public Health Protection

- Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards.
- Prevent contact with, or inhalation of volatiles, from contaminated groundwater.

RAOs for Environmental Protection

- Remove the source of ground or surface water contamination.

Soil

RAOs for Public Health Protection

- Prevent ingestion/direct contact with contaminated soil.
- Prevent inhalation of or exposure from contaminants volatilizing from contaminants in soil.

RAOs for Environmental Protection

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

Soil Vapor

RAOs for Public Health Protection

- Mitigate impacts to public health resulting from existing, or the potential for, soil vapor intrusion into buildings at a site.

SECTION 7: 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 Disposal, On-Site Treatment, Soil Cover remedy.

The estimated present worth cost to implement the remedy is $1,420,000. The cost to construct the remedy is estimated to be $1,367,000 and the estimated average annual cost is $1,000.

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 protection of groundwater soil cleanup objectives (SCOs) will be excavated and transported off-site for disposal at a permitted facility. 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 260 cubic yards of petroleum impacted soils from the petroleum impacted area of concern (AOC) in the vicinity of Building 20 will be removed; and
- Approximately 480 cubic yards of phthalate impacted soils will be removed from the phthalate impacted AOC south of Building 17.

3. Consolidation. Debris and contaminated soils impacted with SVOCs above commercial use SCOs identified in the Demolition Debris Fill AOC will be consolidated and covered by the soil cover. The consolidated material will be covered with sufficient backfill to allow placement of the demarcation layer and soil cover.

4. 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).

5. Treatment. The acetone contamination found in the soil beneath the parking lot in the vadose zone of the acetone impacted AOC will be biologically treated through mechanical aeration. A pilot test will be conducted in this AOC to evaluate the best method to mechanically aerate the acetone impacted soils found beneath the parking lot and other barrier material (i.e., concrete). The full scale operation will commence following the pilot test. The operation of the components of the remedy would continue until the remedial objectives have been achieved, or until the Department determines that continued operation is technically impracticable or not feasible. Mechanical aeration will ensure that all visual, olfactory and photo-ionization detector readings are mitigated. Confirmation testing will be conducted to ensure that the protection of groundwater SCOs are achieved. A community air monitoring program will be implemented to ensure the protection of the community during the mechanical aeration process.

6. Waste Removal. All waste identified in on-site buildings of the main manufacturing buildings AOC will be characterized and disposed or recycled at approved and permitted off-site facilities, including, but not limited to, oil-containing transformers, paint containers, propane cylinders, fluorescent lights and ballasts, petroleum products, batteries, mercury containing devices, asbestos containing materials, oil soaked wood block flooring and phenolic compounds used in the wire coating process.

7. 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;
- restricts the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County DOH;
- prohibits agriculture or vegetable gardens on the controlled property; and
- requires compliance with the Department approved Site Management Plan.

8. 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;
- a provision for evaluation of the potential for soil vapor intrusion for any buildings developed on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
- 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.

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

- monitoring of soil and groundwater to assess the performance and effectiveness of the remedy;
- a schedule of monitoring and frequency of submittals to the Department;

monitoring for vapor intrusion for any buildings occupied or developed on the site, as may be required by the Institutional and Engineering Control Plan discussed in item above.

Exhibit A
Former Rome Cable Site, Parcels 3, 5 and 6
OPERABLE UNIT NO. 2 – EASTERN 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 eastern portion of the site is designated as OU2 and is comprised of Parcel 3 and the eastern side of Parcel 5, including 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). OU2 is the eastern portion of Parcel 5, Parcel 3 and Parcel 6 and is approximately 20 acres in size.

Waste/Source Areas

As described in the Hazardous Materials Inventory Report (HMIR), waste/source materials were identified at the site and are impacting soil and groundwater and possibly soil vapor.

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 at the site include: waste identified in on-site buildings including but not limted to oil containing transformers, paint containers, propane cylinders, fluorescent lights and ballasts, petroleum products, batteries, mercury containing devices, asbestos containing materials, oil soaked wood block flooring and phenolic compounds used in the wire coating process.

The waste/source areas identified will be addressed in the remedy selection process.

Groundwater

The following summarizes the results of groundwater sampling of the 30 monitoring wells and 10 push probe points installed during the RI. Eight additional monitoring wells and 16 direct push points were added as part of the second phase RI work plan addendum. The following table represents the groundwater data obtained during the RI.

Table 1 - Groundwater (On-Site)

Detected Constituents	Concentration Range Detected (ppb)[a]	SCG[b] (ppb)	Frequency Exceeding SCG
VOCs			
cis-1,2-Dichloroethene	ND – 5.3	5	1 out of 68
Trichloroethene	ND – 5.4	5	1 out of 68
Methyl tert-butyl ether	ND - 57	10	4 out of 68
SVOCs			
Benzo(a)anthracene	ND - 7.7	.002	3 out of 68
Benzo(a)pyrene	ND - 6.9	.002	5 out of 68
Benzo(b)fluoranthene	ND - 9.9	.002	4 out of 68
Bis(2-ethylhexyl)phthalate	ND - 9.4	5	7 out of 68
Chrysene	ND - 8.6	.002	3 out of 68
Indeno(1,2,3-cd)pyrene	ND - 2.9	.002	5 out of 68
Phenol	ND – 600	1	6 out of 68
Naphthalene	ND – 16	10	1 out of 68
Inorganics			
Antimony	ND – 22	3	8 out of 68
Arsenic	ND – 370	25	20 out of 68
Barium	42.7 – 2,300	1,000	6 out of 68
Beryllium	ND – 17	3	12 out of 68
Cadmium	ND - 9.9	5	6 out of 68
Chromium	ND – 340	50	13 out of 68
Cobalt	ND - 200	5	23 out of 68
Copper	ND – 8,600	200	13 out of 68
Lead	ND – 1,300	25	15 out of 68
Mercury	ND – 2.7	0.7	7 out of 68
Thallium	ND - 45	0.5	14 out of 68
Vanadium	ND - 530	14	26 out of 68
Zinc	ND - 2,300	2,000	1 out of 68
Pesticides/PCBs			
Aroclor 1248	ND – 0.82	.09	1 out of 68
Aroclor 1254	ND – 1.1	.09	1 out of 68

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).

PCBs were detected above the SCG of 0.009 ppb in one (1) of the 68 groundwater samples collected as part of the RI. The analytical data from GP-08 reported Aroclor 1248 (0.82 ppb) and Aroclor 1254 (1.1 ppb). GP-8 is located in the Demolition Debris Area.

Cis-1,2-dichloroethylene (5.3 ppb) and trichloroethylene (5.4 ppb) were detected at concentrations slightly above the Class GA water quality standard of 5 ppb at GP-04. GP-4 is in the Acetone Impacted Soil Area near former Building 13. One (1) groundwater monitoring well cluster (MW-31S, MW-31I, and MW-31D) and nine (9) direct push sampling points were installed and sampled to further assess this area. No chlorinated ethenes were detected in the additional sampling points.

Methyl tertiary butyl ether (MTBE) concentrations above the Class GA water quality standard of 10 ppb were detected in groundwater samples collected as part of the chlorinated ethene assessment. Groundwater samples collected from direct push sampling points GP-13 (57 ppb), GP-14 (31 ppb), and GP-15 (11 ppb) all reported MTBE concentrations above SCGs. GP-13 is in the Acetone Impacted Soil Area near former Building 13.

Laboratory data on unfiltered groundwater suggest that SVOC impacts above SCGs exist across the eastern portion of the site around Buildings Complex 4 (Buildings 17, 20, 22 and 25), the central staging area, and the demolition debris area.

Laboratory data from unfiltered groundwater samples indicate that inorganic (metals) impacts to groundwater above SCGs are widespread across the site. Metals exceeding SCGs are: Aluminum, Antimony, Arsenic, Barium, Beryllium, Cadmium, Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganese, Mercury, Nickel, Sodium, Thallium, Vanadium, and Zinc.

Based on the findings of the RI, the past disposal of hazardous waste and hazardous substances associated with the wire coating process has resulted in the contamination of groundwater. The site contaminants that are considered to be the primary contaminants of concern which will drive the remediation of groundwater to be addressed by the remedy selection process are: VOCs, SVOCs and PCBs. Groundwater contamination with metals is attributable to long term industrial use of the site and not the result of hazardous waste or hazardous materials disposal. Impacts to groundwater by metals are found on-site and throughout the former Rome Cable Complex facility.

Surface Soil

Surface soil samples were collected from 63 locations around the site. These samples were collected from 0 to 2 inches below ground surface and were analyzed for VOCs, SVOCs, PCBs, pesticides/herbicides 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 SCG[b] (ppm)	Frequency Exceeding Unrestricted SCG	Restricted Use Commercial SCG[c] (ppm)	Frequency Exceeding Restricted SCG
SVOCs					
Benzo(a)anthracene	ND – 360	1	18 out of 63	5.6	8 out of 63
Benzo(a)pyrene	ND – 400	1	19 out of 63	1	19 out of 63

Detected Constituents	Concentration Range Detected (ppm)[a]	Unrestricted SCG[b] (ppm)	Frequency Exceeding Unrestricted SCG	Restricted Use Commercial SCG[c] (ppm)	Frequency Exceeding Restricted SCG
Benzo(b)fluoranthene	ND – 520	1	18 out of 63	5.6	9 out of 63
Benzo(k)fluoranthene	ND – 180	0.8	5 out of 63	56	2 out of 63
Chrysene	ND – 390	1	5 out of 63	56	2 out of 63
Dibenzo(a,h)anthracene	ND – 67	0.33	11 out of 63	0.56	9 out of 63
Fluoranthene	ND – 1,000	100	2 out of 63	500	1 out of 63
Indeno(1,2,3-cd)pyrene	ND – 230	0.5	13 out of 63	5.6	6 out of 63
Phenanthrene	ND -870	100	2 out of 63	500	1 out of 63
Pyrene	ND – 710	100	2 out of 63	500	1 out of 63
METALS					
Copper	ND – 261,000	50	9 out of 63	270	9 out of 63
Lead	ND – 3,460	63	9 out of 63	1,000	3 out of 63

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.

Surface soil data has shown SVOC concentrations in excess of NYSDEC Part 375 commercial use SCOs at all locations around the Building Complex 4 perimeter (SS-1 through SS-19). These SVOCs consist of the PAH compounds benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, fluoranthene, indeno (1,2,3-c,d) pyrene, phenanthrene, and pyrene. PAH SVOCs were also detected above Part 375 commercial use SCOs.

Copper and lead were detected in surface soils collected from the northwestern perimeter of Building Complex 4 in excess of NYSDEC Part 375 commercial use SCOs. Copper concentrations ranging from 304 ppm to 7,760 ppm exceeded the commercial use SCOs of 270 ppm in SS-1 through SS-4, SS-15 through SS-17 and SS-21 adjacent to Building Complex 4. Lead concentrations exceeded the commercial use SCOs of 1,000 ppm in surface soil samples SS-1 (3,460 ppm) and SS-2 (2,340 ppm). Copper (261,000 ppm) and lead (1,430 ppm) concentrations exceeded commercial use SCOs in sample SS-69A which was recovered from a small area devoid of vegetation approximately 600-feet east of Building 29. No pesticides or herbicides were detected above NYSDEC Part 375-6 commercial use SCOs for any of the 20 surface soil samples tested for these parameters.

No VOCs or PCBs above NYSDEC Part 375 commercial use 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 SVOCs have resulted in the contamination of soil. The site contaminants identified in surface soil which are considered to be the primary contaminants of concern, to be addressed by the remedy selection process are SVOCs. Surface soil contamination with metals is attributable to long term industrial use of the site and not the result of hazardous waste or hazardous materials disposal. Impacts to surface soils are found on-site and throughout the former Rome Cable Complex facility.

Subsurface Soils

Soil borings were advanced and subsurface soil samples were recovered at 26 soil boring and 10 push probe locations across the site. Ten (10) additional subsurface soil samples were collected from selected test pits for laboratory analyses. Subsurface soil consists of an urban fill layer with a variable thickness of 3- to 7-feet underlain by glacio-lacustrine deposits composed of approximately 28- to 35-feet of loose, stratified, light brown and gray fine sand and silt. A stiff, varied, brown and gray clay and silt glacio-lacustrine deposit underlies the glacio-lacustrine fine sand and silt. The results of the sub-surface soil investigation are presented below:

Table 3 - Soil

Detected Constituents	Concentration Range Detected (ppm)[a]	Unrestricted SCO[b] (ppm)	Frequency Exceeding Unrestricted SCO	Restricted Use Commercial SCO[c] (ppm)	Frequency Exceeding Commercial SCO
VOCs					
Acetone	ND – 0.420	0.05	19 out of 46	500	0 out of 46
SVOCs					
Benzo(a)anthracene	ND – 5.6	1	6 out of 46	5.6	0 out of 46
Benzo(b)fluoranthene	ND – 6.5	1	4 out of 46	5.6	2 out of 46
Benzo(k)fluoranthene	ND – 3.0	0.8	5 out of 46	56	0 out of 46
Chrysene	ND – 5.9	1	6 out of 46	56	0 out of 46
Indeno(1,2,3-cd)pyrene	ND - 29	0.5	6 out of 46	5.6	3 out of 46
Inorganics					
Selenium	ND – 8.4	3.9	1 out of 46	1,500	0 out of 46
Pesticides/PCBs					
Endrin	ND – 0.430	0.014	1 out of 46	89	0 out of 46

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.

No PCBs were detected at concentrations exceeding the commercial use SCOs in any of the 46 subsurface samples tested.

One (1) VOC, acetone, was reported in the site subsurface soil above its unrestricted use SCOs. Acetone was identified above the SCOs in 19 subsurface soil samples at concentrations ranging from 53 ppb to 420 ppb. Subsurface soil exceeding the unrestricted use SCOs for acetone underlies approximately 13 acres of the site (See Figure 21). Although the unrestricted use SCO is exceeded in soil, no concentrations of acetone detected in site groundwater exceed the TOGS 1.1.1 groundwater standard of 50 ppb.

Subsurface soil samples collected from GP-08, TP-25, and TP-28 were recovered from the demolition debris area and exhibited SVOC concentrations exceeding unrestricted SCOs. SVOCs identified above unrestricted SCOs in this area were benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, and chrysene. Subsurface SVOC impacts cover an aerial extent of approximately 100-feet by 100-feet and extend to a depth of approximately 6 ft bg. An estimated 2,300 cubic yards (3,400 tons) of SVOC impacted soil exists at the demolition debris area. Soil samples B-26, TP-32, TP-33, and TP-35 were all recovered from the fill layer in the eastern portion of the central staging area. SVOCs exceeding the SCOs in these samples were benzo(a)anthracene, benzo(k)fluoranthene, and chrysene.

An area of phthalate plasticizer soil contamination was observed during the completion of boring B-08 and the excavation of test pit TP-6 at the phthalate tank loading area located on the west side of Building 25 Subsurface soil analytical results reported concentrations of bis(2-ethylhexyl)phthalate (140 ppm and 640 ppm) and di-noctyl phthalate (41 ppm and 140 ppm). The extent of phthalate impacts covers an area of approximately 40-feet by 40-feet centered on the location of boring B-08. The impacted soil volume in the unsaturated zone is approximately 480 cubic yards (720 tons).

One metal (selenium) was reported above the unrestricted use SCO in the soil sample from GP-06 (8.4 ppm). One pesticide (Endrin, 430 ppb) was detected above the unrestricted use SCO of 0.014 ppm.

Petroleum-impacted subsurface soil was observed at the former diesel fuel underground storage tanks (UST) located south of Building 20. Visible and olfactory evidence of impacts were observed from approximately 2 feet below ground surface to the top of the water table encountered at approximately 8 feet below ground surface. Analytical results from this location detected no compounds in excess of NYSDEC Part 375 protection of groundwater SCOs. The extent of petroleum covers an area of approximately 35-feet by 25-feet centered on the location of boring B-06. The impacted soil volume in the unsaturated zone is approximately 260 cubic yards (approximately 390 tons).

Based on the findings of the RI, the past disposal of hazardous waste and the presence of VOCs and SVOCs have resulted in the contamination of subsurface 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 VOCs and SVOCs. . Subsurface soil contamination with metals is attributable to long term industrial use of the site and not the result of hazardous waste or hazardous materials disposal. The areas of sub-surface impacts are limited to the site and the known areas of concern.

Soil Vapor

Based on the findings of the Remedial Investigation, the presence of chlorinated and non-chlorinated VOCs may create contamination of soil vapor. The site contaminants that are considered to be the primary contaminants of concern which would drive future remediation of soil vapor if redevelopment was to occur are, trichloroethene, cis-1,2-dichloroethene and petroleum contamination found in groundwater. However at this time no structures are occupied or heated so no evaluation was performed. Soil vapor evaluations and/or remedies will need to be addressed by the remedy.

Exhibit B
Former Rome Cable Site, Parcels 3, 5 and 6
OPERABLE UNIT NO. 2 – EASTERN 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.

Alternative 1: 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.

Common Remedial Element for Operable Units 2 – Site-Wide Waste Removal

The alternatives listed below for each area of concern include the site-wide removal of various wastes from on-site buildings. These wastes include, but are not limited to: oil containing transformers, paint containers, propane cylinders, fluorescent lights and ballasts, petroleum products, batteries, mercury containing devices, asbestos containing materials, oil soaked wood block flooring and phenolic compounds used in the wire coating process. All materials will be evaluated for off-site disposal or recycling. The capital cost of these removals is estimated to be $1 million.

OPERABLE UNIT NO. 2

Petroleum Impacted Area Soils

Alternative 1A: Soil Cover and Site Management

The Site Management Alternative requires implementing institutional controls for this area of the site. This alternative includes 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 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.

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

Alternative 1B: 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 protection of groundwater soil cleanup objectives listed in Part 375-6.8 (a). This alternative would include the excavation and removal for proper disposal approximately 260 cubic yards of grossly contaminated soil, as defined in 6

NYCRR Part 375-1.2(u) and soils that create a nuisance condition, as defined in Commissioner Policy CP-51 Section G. 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). This alternative would include a post remedial action performance groundwater monitoring program to demonstrate the restoration of groundwater.

Present Worth: ……. $57,000
Capital Cost:..... $57,000
Annual Costs: …… $0

Phthalate Impacted Soil Area

Alternative 2A: Soil Cover and Site Management

The Site Management Alternative requires implementing engineering and institutional controls for this area of site. This alternative includes engineering controls in the form of a soil cover 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 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.

Present Worth: ……. $13,000
Capital Cost:..... $6,200
Annual Costs..... $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 protection of groundwater soil cleanup objectives listed in Part 375-6.8 (a). This alternative would include the excavation and removal for proper disposal approximately 480 cubic yards of phthalate 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). This alternative would include a post remedial action performance groundwater monitoring program to demonstrate the restoration of groundwater.

Present Worth: ……. $86,000
Capital Cost:..... $86,000
Annual Costs: …… $0

Demolition Debris Impact Soil Area

Alternative 3A: Consolidation, Soil Cover and Site Management

The Site Management Alternative requires implementing engineering and institutional controls for this area of site. This alternative includes engineering controls in the form of a soil cover 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. All debris, grossly impacted soils and soils exceeding the commercial SCOs will be consolidated to minimize the soil cover area. Where a 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.

Present Worth: ……. $44,000
Capital Cost:..... $25,000
Annual Costs (30 Years): ……$1,000

Alternative 3B: 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 protection of groundwater soil cleanup objectives listed in Part 375-6.8 (a). This alternative would include the excavation and removal for proper disposal approximately 2300 cubic yards of SVOC impacted soils (Figure 19). 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). This alternative would include a post remedial action performance groundwater monitoring program to demonstrate the restoration of groundwater.

Present Worth: ……. $424,000
Capital Cost: ……..$424,000
Annual Costs: ……..…….. $0

Acetone Impacted Area

Alternative 4A: Mechanical Aeration

This Alternative includes the mechanical soil turning of acetone impacted soils found beneath the asphalt and concrete cover material to enhance natural degradation processes. The acetone contamination is trapped below the asphalt and concrete parking lot and on-site pads. No groundwater contamination has been found in this area. The acetone plume is found in the vadose zone below the ground surface and above the water-table. The mechanical soil turning would allow for aeration of the impacted soils and a natural bio-degradation of the low level acetone impacted soils. A pilot test would be conducted to determine the effectiveness of the program prior to the full scale implementation. This alternative would include post remedial monitoring of both soil and groundwater to evaluate the effectiveness of the remediation. Institutional controls, in the form of an environmental easement and a site management plan, would be required to protect public health and the environment from any contamination identified at the site.

Present Worth: ……. $193,000
Capital Cost:.....$159,000
Annual Costs (2-5 Years): ……$10,000

Alternative 4B: Site Management

The Site Management Alternative requires implementing institutional controls for this area of site. This alternative includes 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. A site cover currently exists and will be maintained to allow for commercial use of the site. Any site redevelopment will maintain a site cover, which may 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 a 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.

Present Worth: ……. $152,000
Capital Cost:.....$10,000
Annual Costs: …… $10,000

OU2 Groundwater and Surface Soils

Alternative 5A: Institutional Controls and Site Management

Although removal, treatment and/or consolidation and capping of residual contamination may result in the achievement of SCGs, site-wide institutional controls and a site management plan will be required to address the potential for residual soil, groundwater and sediment contamination. This alternative involves institutional controls, including the execution of an environmental easement and development and implementation of a Site Management Plan. These controls would restrict the use of the site to commercial use, which would also include industrial use, subject to local zoning; restrict the use of groundwater at the site, and require a site management plan to ensure that soils that are suitable for commercial use at this site are not used as fill at sites with a higher use. This alterative assumes the implementation of a source removal, treatment and/or control remedy (ies) to address the areas of concern, but an approach which will not yield pre-disposal conditions upon implementation.

Present Worth: ……. $40,000
Capital Cost: ……. $40,000

Exhibit C
Former Rome Cable Site, Parcels 3, 5 and 6
OPERABLE UNIT NO. 2 – EASTERN PORTION

Remedial Alternative Costs

Remedial Alternative	Capital Cost ($)	Annual Costs ($)	Total Present Worth ($)
Site-Wide Waste Removal	1,000,000	0	1,000,000
Operable Unit - 2			
1 – No Action	0	0	0
1A - Petroleum Impacted Soils Soil Cover and Site Management	0	1,000	17,000
1B - Petroleum Impacted Soils Soil Removal and Off-Site Disposal	57,000	0	57,000
2A - Phthalate Impacted Soils Soil Cover and Site Management	0	1,000	17,000
2B - Phthalate Impacted Soils Soil Removal and Off-Site Disposal	86,000	0	86,000
3A – Demolition Debris Area Soil Cover and Site Management	25,000	1,000	44,000
3B – Demolition Debris Area Removal with Off-Site Disposal	424,000	1,000	440,000
4A - Acetone Impacted Area **Mechanical Aeration**	159,000	10,000	193,000
4B - Site Management	10,000	10,000	152,000
5A – OU2 Groundwater, Surface Soils and Sediments - Institutional Controls and Site Management	40,000	0	40,000
Total Remedy (1B,2B,3A,4A,5A +Site Wide Removals)	**1,367,000**	**11,000**	**1,420,000**

Exhibit D
Former Rome Cable Site, Parcels 3, 5 and 6
OPERABLE UNIT NO. 2 – EASTERN PORTION

SUMMARY OF THE SELECTED REMEDY

The Department is selecting Alternatives:
1B – Petroleum Impacted Soil Removal with Off-Site Disposal;
2B – Phthalate Impacted Soil Removal with Off-Site Disposal;
3A – Demolition Debris Area Soil Cover and Site Management;
4A – Acetone Impacted Area Mechanical De-compaction and Natural Degradation;
5A –Site Wide Institutional Controls and Site Management for Groundwater and Surface Soils; and
Site-Wide Waste Removal, as the remedy for this site. These alternatives will achieve the remediation goals for the site by removing soils impacted with PCBs, petroleum and phthalates, consolidating and covering soil and debris that is contaminated with low level semi-volatile organics, aerating volatile organic compound contamination and imposing institutional and engineering controls on site wide surface soil and groundwater. 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 1B and 2B), on-site consolidation and capping (Alternative 3A), on-site treatment (Alternative 4A) and (institutional controls and site management for OU2 (Alternative 5A) that would satisfy this criterion. Alternatives 1B and 2B remove contaminated soils for off-site disposal. Alternative 3A will consolidate soil and demolition debris on-site below a soil cap and reduce exposure to low level contamination. Alternative 4A will mechanically aerate site soils to allow for enhanced natural biological degradation. All remedies will require institutional and engineering controls to minimize future exposures to low levels of site-wide surface soil and groundwater contamination. The Site-Wide Waste Removal component requires all known wastes to be characterized and removed from the site for proper off-site disposal or recycling at approved facilities, thereby eliminating exposure. The other alternatives provide a lesser degree of protection by leaving contamination in place, uncontrolled or 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 1B, 2B, 3A, 4A and 5A comply with SCGs to the extent practicable. Alternatives 1B and 2B address source areas of contamination and comply with the restricted use soil cleanup objectives. Alternative 3A consolidates and manages low level contaminated soils beneath a soil cap which will comply with the restricted use soil cleanup objectives and will create conditions necessary to

reduce impacts to groundwater. Alternative 4A will address source areas of contamination through enhanced natural biological degradation and will comply with the restricted use soil cleanup objectives. Alternative 5A will comply with SCGs by restricting future use through the implementation of engineering and institutional controls. The Site-Wide Waste Removal component complies with SCGs by properly handling, disposing or recycling all identified waste.

The remaining alternatives also comply with this criterion but to a lesser degree or with lower certainty. Because Alternatives 1B, 2B, 3A, 4A, and 5A 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 1B and 2B). Since the contamination associated with the demolition debris area is very low, consolidation and capping with a soil cover will be an effective alternative. Alternative 4A will treat the large low level acetone contamination found beneath the parking lot area will within a short time frame provide long-term effectiveness. Site management (Alternative 5A) remains an effective alternative in combination with source removal and treatment in the long-term. The Site-Wide Waste Removal component provides long-term effectiveness by removing all waste for proper off-site disposal or recycling.

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 1B, 2B, and 4A 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 1B, 2B, 3A, and 4A all have short term impacts which can be easily controlled through construction techniques and engineering controls. Alternative 5A has no short term impacts that require control. All the alternatives have short term effectiveness which will be realized within short time period (i.e., one year). Alternative 4A may take a longer than the other alternatives to achieve permanent effectiveness.

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. Alternative 4A will be evaluated through a pilot program to determine the best method to provide aeration of subsurface soils. Once the pilot test is completed the actual remedial action is expected to be completed in one construction season.

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 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 (1B, 2B, 3A, and 4A). However the long-term management of these wastes is mitigated. Alternative 3A is considered to be the exception to the issues concerning long-term management and cost, because the levels of contamination are very low and the off-site removal costs are much greater. Alternative 5A costs are low in the short term; however over 30 years the present worth is much greater.

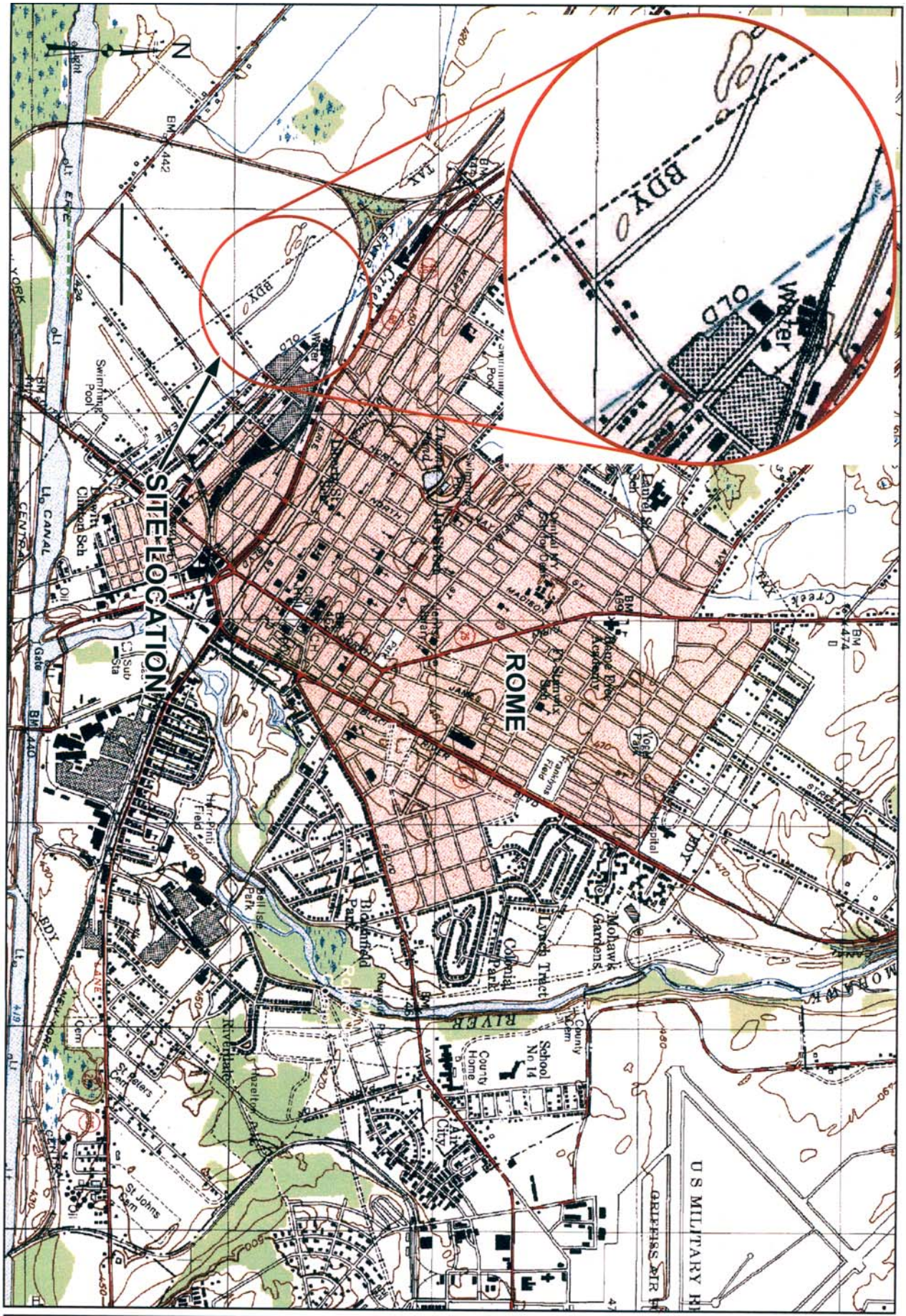
8. Land Use. When cleanup to pre-disposal conditions is determined to be infeasible, the Department may consider the current, intended, and reasonable anticipated future land use of the site and its surroundings in the selection of the soil remedy.

Alternatives that leaves contamination in place and untreated are the least desirable because it would limit the future of the site, whereas Alternatives 1B, 2B, and 4A would remove or treat the contaminated soil or waste permanently. The residual contamination with Alternative 3A would be controllable with implementation of a Site Management Plan. Through the implementation of alternatives 1B, 2B, 3A, 4A, and 5A, the requirements for long-term institutional and engineering controls will be reduced and future use would be enhanced.

The final criterion, Community Acceptance, is considered a "modifying criterion" and was taken into account after evaluating those above. It was 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 1B, 2B, 3A, 4A, 5A and Site-Wide Removals are being selected because, as described above, they satisfy the threshold criteria and provide the best balance of the balancing criterion.



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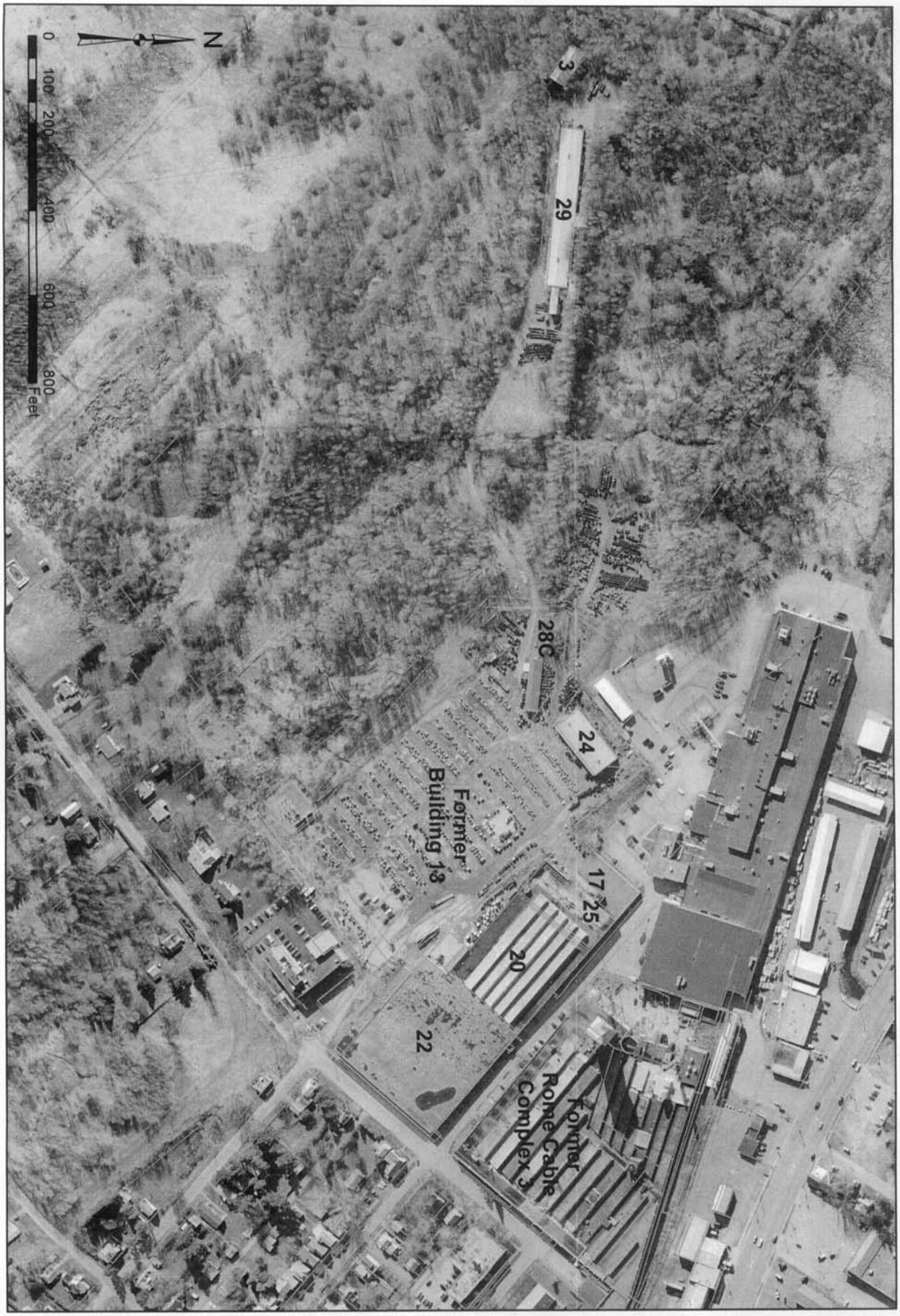
Former Rome Cable Corporation
Parcels 3, 5 and 6
Remedial Investigation/Alternatives Analysis
SITE LOCATION MAP
City of Rome New York

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 Facility
Proposed Remedial Action Plan

Operable Unit 2
The Eastern Portion of Parcel 5 and Parcels 3 and 6

Figure 4
Areas of Concern

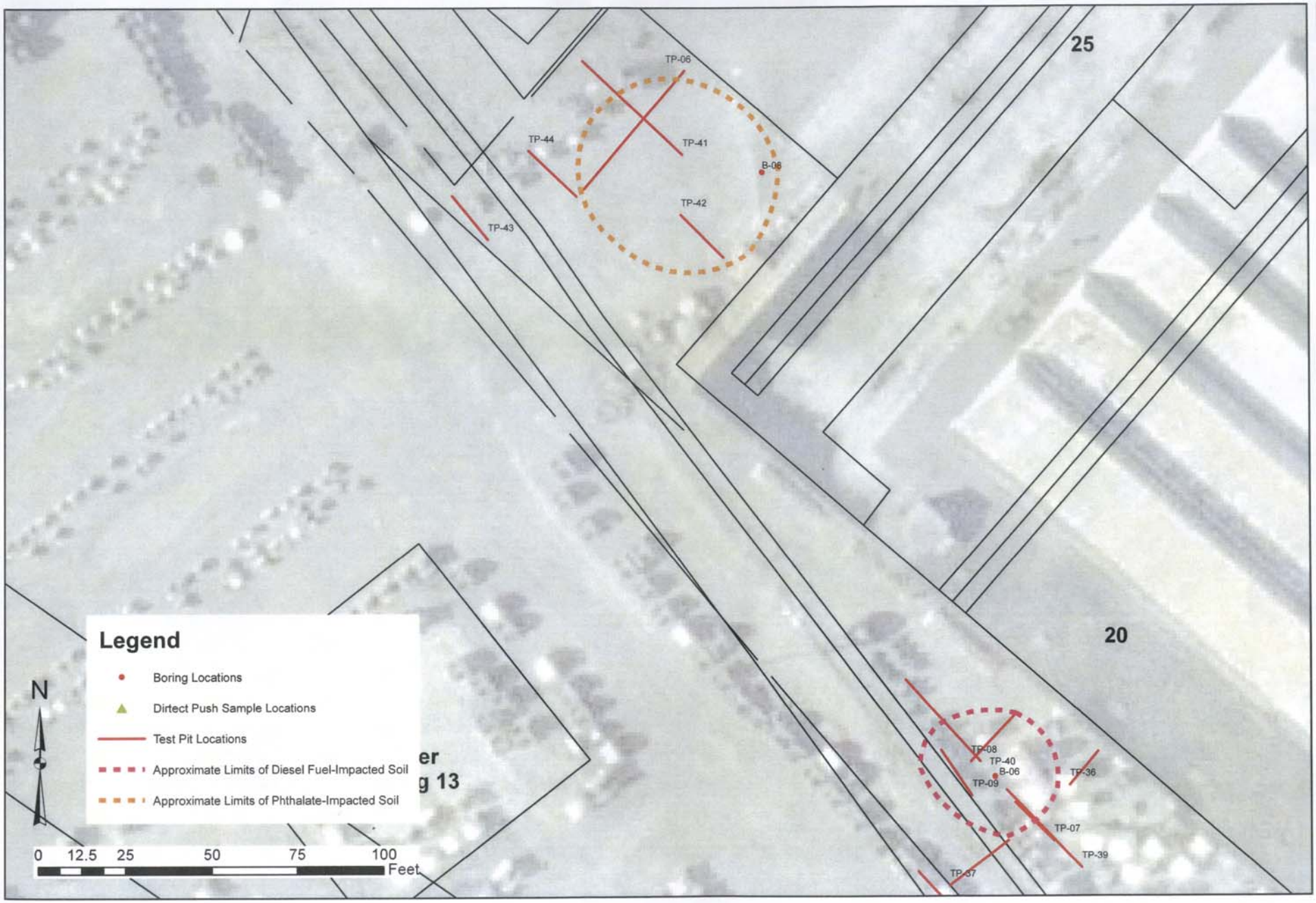

Figure 5

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

Former Rome Cable Corporation
Parcels 3, 5 and 6
Remedial Investigation/Alternatives Analysis
PHTHALATE AND DIESEL FUEL-IMPACTED AREAS
City of Rome New York

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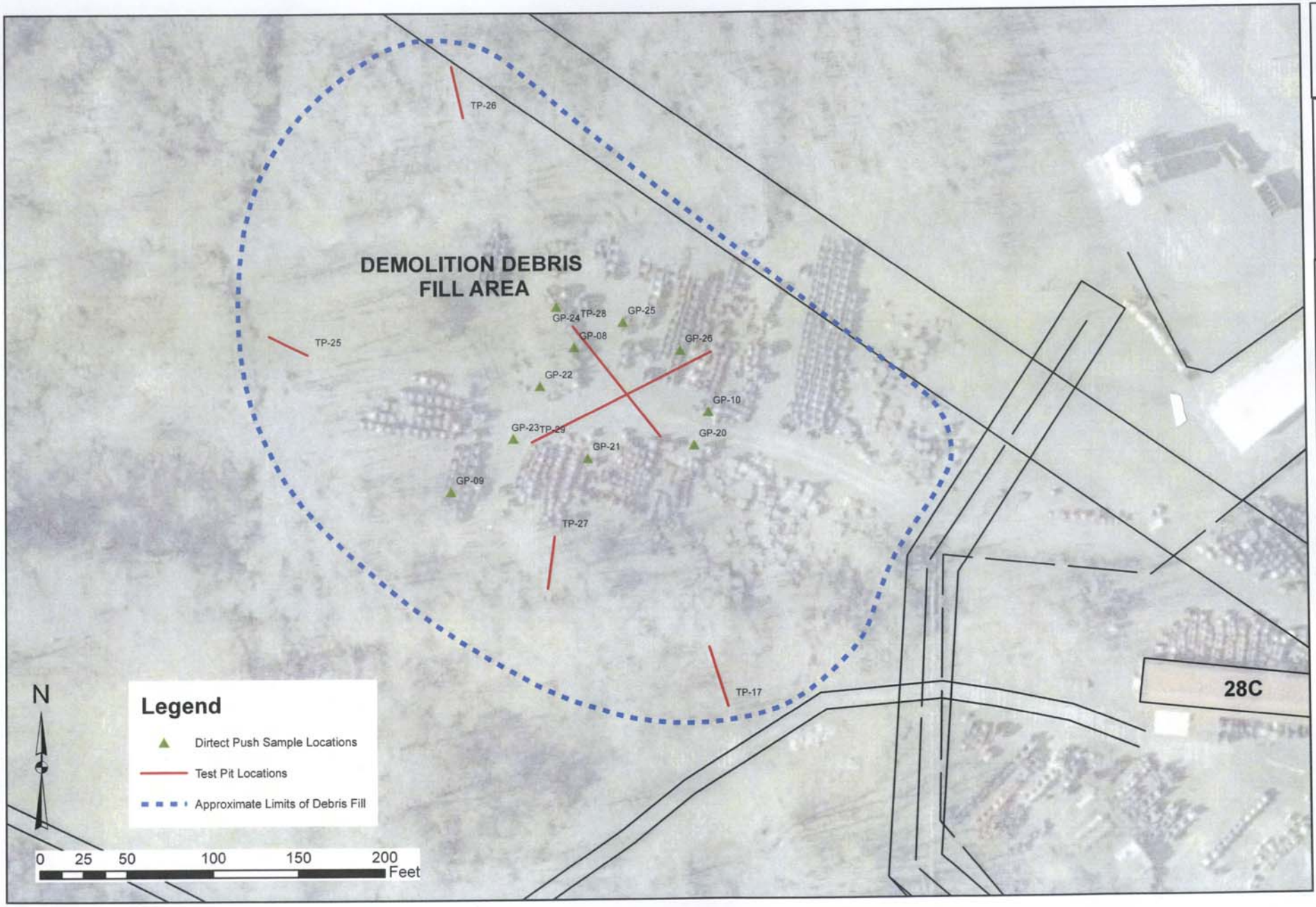

Figure 6

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

Former Rome Cable Corporation
Parcels 3, 5 and 6
Remedial Investigation/Alternatives Analysis
DEMOLITION DEBRIS AREA
City of Rome New York

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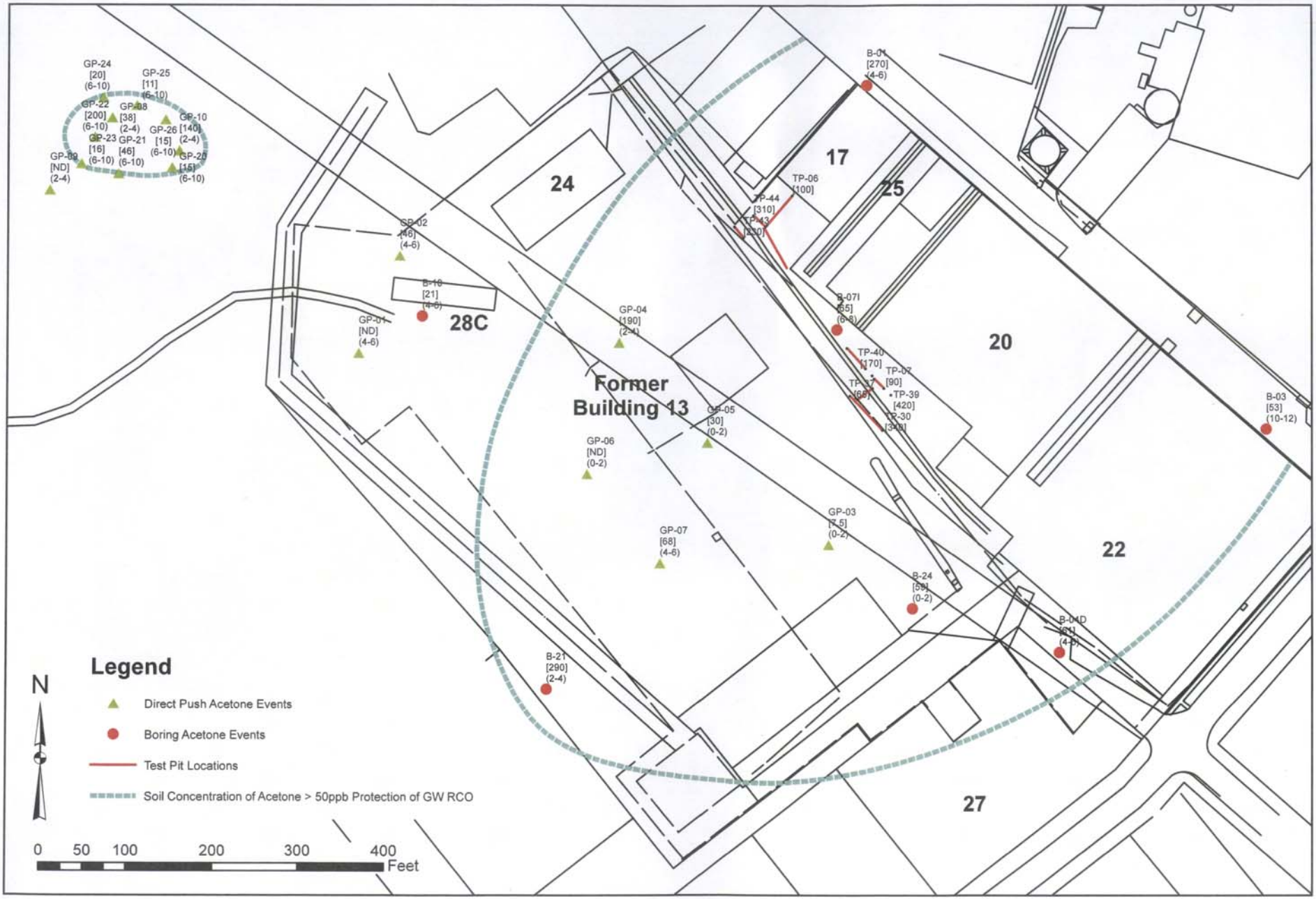

Figure 7

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

Former Rome Cable Corporation
Parcels 3, 5 and 6
Remedial Investigation/Alternatives Analysis
ACETONE IMPACTED SOIL AREA
City of Rome New York

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APPENDIX A

Responsiveness Summary

RESPONSIVENESS SUMMARY

Former Rome Cable Site, Parcels 3, 5 & 6
Operable Unit No. 2: Eastern 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. 2: Eastern 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.