

# FINAL SITE MANAGEMENT PLAN

**Former Jones & Laughlin 18-Acre Site  
Site No. E645029**

**Town of Clifton  
St. Lawrence County, New York**

**Prepared for:  
St. Lawrence County  
48 Court Street  
Canton, New York**

**Prepared by:  
CDM Smith  
11 British American Blvd.  
Latham, New York**

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## CERTIFICATIONS

I, John P. Blaum, certify I am currently a Qualified Environmental Professional as defined in 6 NYCRR Part 375 and that this Report was prepared in accordance with all applicable statutes and regulations and in substantial conformance with DER Technical Guidance for Site Investigation and Remediation (DER-10) and that all activities were performed in full accordance with the DER-approved work plan and an DER-approved modifications.

085079

NYS Professional Engineer #

6/6/14

Date

*John P. Blaum*

Signature



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# Section 1

## Introduction and Description of Remedial Program

### 1.1 Introduction

Camp Dresser McKee & Smith (CDM Smith) has prepared this Site Management Plan (SMP) on behalf of St. Lawrence County (County) for the former J&L Benson Mine Site – 18-acre Site (herein referred to as the Site) under the State of New York’s Environmental Restoration Program (ERP). The Site location is presented on Figure 1-1 and Figure 1-2 and shows the overall Site Plan.

This document is required as an element of the remedial program under the New York State Inactive Hazardous Waste Disposal Site Remedial Program administered by the New York State Department of Environmental Conservation (NYSDEC), site number E645029. The Site is being addressed in accordance with the NYSDEC Record of Decision (ROD), Site No. E645029, dated March 2013 (Appendix A).

#### 1.1.1 General

The County entered into a State Assistance Contract (SAC) with the NYSDEC to investigate and remediate, as appropriate, potential areas of environmental concern associated with the Site under the ERP guidelines. A Final Site Investigation (SI) Report presenting the findings of the SI was submitted to the NYSDEC and the New York State Department of Health (NYSDOH) in January 2012 and was approved by the NYSDEC on January 15, 2013 subject to minor modifications. A Final Alternatives Analysis Report (AAR) was developed based on the findings of the SI and was submitted to the NYSDEC and approved in April 2013.

This SMP was prepared by CDM Smith on behalf of the County for the Site, in accordance with the requirements in NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation, dated May 2010, and the guidelines provided by NYSDEC. This SMP addresses the means for implementing the Engineering Controls (ECs) and Institutional Controls (ICs) that is required by the Environmental Easement for the Site.

#### 1.1.2 Purpose

The Site contains low levels of contamination in the soil and groundwater that are residuals from the former mining operations conducted at the Site. Existing ECs and ICs have been incorporated into the site remedy to control exposure to remaining contamination during the use of the Site to ensure protection of public health and the environment. An Environmental Easement granted by the County, which will be recorded with the St. Lawrence County Clerk, requires compliance with this SMP and all ECs/ICs placed on the Site. The ECs/ICs place restrictions on site use, and mandate operation, maintenance, monitoring and reporting measures for all ECs/ICs. This SMP specifies the methods necessary to ensure compliance with all ECs/ICs required by the Environmental Easement for the low level contamination that remains at the Site. This SMP has been approved by the NYSDEC, and compliance with this plan is required by the grantor of the Environmental Easement and the grantor’s successors and assigns. This SMP may only be revised with the approval of the NYSDEC.

This SMP provides a detailed description of all procedures required to manage remaining contamination at the Site after completion of the remedial action, including: (1) implementation and management of all ECs and ICs; (2) performance of periodic inspections, certification of results, and submittal of Periodic Review Reports (PRR); and (3) defining criteria for termination of periodic inspections, certification of results, and submittal of PRRs.

To address these needs, this SMP includes two plans: (1) an EC/IC Plan for implementation and management of ECs and ICs, which includes a reporting plan for the submittal of data, information, recommendations, and certifications to NYSDEC; and (2) a description of the PRRs for the submittal of data, information, recommendations, and certifications to NYSDEC.

It is important to note that:

- This SMP details the site-specific implementation procedures that are required by the Environmental Easement. Failure to properly implement the SMP is a violation of Environmental Conservation Law and the Environmental Easement, which are grounds for revocation of the Certificate of Completion (COC).
- Failure to comply with this SMP is also a violation of 6NYCRR Part 375 and the NYSDEC ROD for Site No. E645029 dated March 2013 (Appendix A), and thereby subject to applicable penalties.
- If future development contemplates using Site groundwater as a source for potable or process water, the site owner must provide treatment to meet the water quality standards as directed by NYSDOH or St. Lawrence County Department of Health (SLCDOH). Additionally, monitoring and reporting measures will be required.

### 1.1.3 Revisions

Revisions to this plan will be proposed in writing to the NYSDEC's project manager. In accordance with the Environmental Easement for the Site, the NYSDEC will provide a notice of any approved changes to the SMP and append these notices to the SMP that is retained in its files.

## 1.2 Site Background

### 1.2.1 Site Location and Description

The Site consists of three Areas of Concern (AOC) totaling approximately 18-acres of industrially-zoned land located at the intersection of New York State Route 3 (Route 3) and County Route 60 (CR 60) in the Town of Clifton, New York. The 18-acre site is a portion of a 54-acre lot located in the vicinity of Route 3 and CR 60. Abutting properties are owned by the Benson Mines Trust. A Site Location Map is included as Figure 1-1 and a Site Plan is included as Figure 1-2. The AOCs investigated by CDM Smith during the Site Investigation were identified as AOC A, B, and C, and are described below.

- AOC A is approximately 5.8-acres in size and is located north/north west of the intersection of Route 3 and CR 60. The area is primarily flat and consists of the former parking lot, the former vehicle wash station, and some tailings pile.
- AOC B is approximately 6.34-acres in size and is south of the intersection between Route 3 and CR 60. This area consists primarily of a wooded area with a large tailings pile from previous mining operations occupying about one-third of the southern portion of this AOC and slopes significantly

from south to north. It is also reported to consist of a former construction camp that is no longer standing, but was identified from historical photos and a partially buried concrete structure. Some of the building slab was identified during this site investigation.

- AOC C is approximately 5.86-acres in size and located east of the intersection of Route 3 and CR 60. This area consists of an active electrical substation, overhead power lines, a stretch of concrete road (which was formally old State Route 3), and a pond. The Little River also flows across the eastern corner of this AOC.

### 1.2.2 Site History

The Benson Ore body was first discovered, according to legend, around 1810 when engineers were surveying the route for a military road from the Hudson River at Albany to the St. Lawrence River at Ogdensburg. The survey passed over the present ore body, and the effect of the magnetic ore upon the engineers' instruments directed attention to the deposit. The first mining of the property was started in 1889 by the Magnetic Iron Company following completion of a railroad spur into the area by the then flourishing lumber industry. During this period of operation, the Benson mines became the first iron mine in the world to produce and deliver ore concentrates that were separated from non-iron materials by magnetism. In 1922, Benson interests purchased the pit property (approximately 3,300-acres) previously leased from Magnetic Iron Company.

Test runs began in the Concentrator in November 1943 and ore shipments to the Pittsburgh furnaces began in February 1944. Annual capacity of the plant during the 1950's and 1960's was approximately 1,100,000 long tons of magnetite concentrates and 700,000 long tons of martite concentrates. During this period, the Benson Mines – operated by J&L Steel, was the largest open pit magnetite mine in the world. The New York Ore Division provided about 22 percent of Jones & Laughlin Steel Corporation's ore requirements.

In 1980, J&L Steel transferred the property to the St. Lawrence County Industrial Development Agency, who transferred it to the Star Lake Industrial Park (referred to as the Park Corporation), who in turn transferred it to Exor Corporation in 1987. The 54-acre area, on which the plant is located, was acquired by the St. Lawrence County through a tax foreclosure proceeding in June 1989, and transferred title to Dongrove Holdings Limited on or about August 1990. St. Lawrence County obtained temporary incidents of ownership (TIO) through the ERP to the entire 54-acre area in February 2005. This TIO continues to the present date.

### 1.2.3 Hydrogeologic Conditions

Surface water runoff at the Site primarily drains to the north towards the Little River. Groundwater flows predominantly north towards the Little River. Depth to groundwater measured in July 2012 indicated groundwater within the three AOCs ranging from 15 to 36 feet below ground surface (bgs). Groundwater elevations range from 1,416 feet to 1,439 feet above mean sea level (amsl).

## 1.3 Summary of Site Investigation Findings

Site investigation work was conducted between June and August 2012. Major investigative tasks performed included the following:

- A geophysical survey of AOCs A, B and C, and a site survey to define property lines;
- Installation of seven new groundwater monitoring wells;

- Gauging and sampling of new wells and selected existing onsite wells;
- Collection of subsurface soil samples during well installation; and
- Collection of surface soil and sediment samples.

In accordance with DER 10, the screening criteria used for all surface soil, and subsurface soil for the SI was the NYSDEC Unrestricted Use Soil Cleanup Objectives (SCO) – NYCRR Part 375-6.8(a). This criterion was chosen because it is the most stringent of the NYSDEC screening criteria. Soil samples were also compared to Industrial and Commercial Use standards if the Unrestricted Use SCO was exceeded and there were no exceedances of the industrial or commercial standards. The Site is currently zoned as industrial use.

Sediment samples were compared to the most stringent NYSDEC screening criteria for metals (Lowest Effect Level standards) and organic compounds (Human Health Bioaccumulation standard), as outlined in the Technical Guidance for Screening Contaminated Sediments (January 1999). Sediment samples were also compared to Severe Effect Level standards for metals, and for organic compounds, the Benthic Aquatic Acute and Chronic Toxicity standards and the Wildlife Bioaccumulation standards. Groundwater results were compared to the Technical Operations and Guidance Series (TOGS) 1.1.1 - Ambient Water Quality Standards (AWQS).

### 1.3.1 Geophysical Survey

Based on the geophysical survey conducted at the Site, the following conclusions were drawn:

- Areas of possible buried metal, remnants of former structures, concrete pads, scattered small surface piles of metal objects, utilities, and possible utility segments are present at AOCs A and B.
- One anomaly gave a strong response in AOC C off the edge of the area known as the former construction camp, and CDM Smith took a soil sample here. Excavation would be required to further investigate this anomaly.
- No subsurface anomalies were identified in AOC C that registered strong enough to indicate the presence of buried metal.

### 1.3.2 Surface Soil Sampling

Fifteen surface soil samples were collected in the three AOCs. A brief description of results is described below:

- PCBs were only detected at three locations (two locations within AOC A and one location within AOC B), with the highest concentration reported at 0.210 mg/kg, only slightly exceeding the Unrestricted Use SCO of 0.100 mg/kg.
- SVOCs were detected above the Unrestricted Use SCOs at only one surface soil sample within AOC A. However, the compounds detected were also detected in the laboratory blank and are most likely associated with cross-contamination by the laboratory.
- Metals exceedances were observed at each surface soil sample location within AOCs A, B, and C. Copper, Zinc, and Barium were the primary metals exceeding the Unrestricted Use SCO. The concentrations that were observed are consistent throughout the site and most likely associated with naturally occurring concentrations.

### 1.3.3 Subsurface Soil Sampling

No compounds were detected in subsurface soils at concentrations exceeding Unrestricted Use SCO for VOCs, SVOCs, Metals or PCBs.

### 1.3.4 Sediment Sampling

No compounds were detected at concentrations exceeding the Unrestricted Use SCO for VOCs, SVOCs, Metals, or PCBs.

### 1.3.5 Groundwater Sampling

Seven new monitoring wells were installed and both new and existing were sampled in AOCs A, B, and C. VOCs and PCBs were not detected in any of the samples collected and only one well, located in AOC C, had a detection for SVOCs.

Metals concentrations above the AWQS were detected in every monitoring well sampled. This is not unexpected due to the site's history and is most likely associated with naturally occurring concentrations. In addition, iron and manganese most consistently exceeded the AWQS where elevated turbidity levels were observed during the groundwater sampling, which can result in increased metals concentrations in groundwater.

## 1.4 Summary of Remedial Actions

Due to the lack of significant environmental impacts, comparison to SCGs, and an evaluation of potential public health and environmental exposure routes, no remedial actions are necessary for the Site. The actions required for the Site pursuant to the March 2013 ROD are:

1. Maintain existing Site cover which may consist either of the structures such as buildings, pavement, and sidewalks, or a soil cover;
2. Development and implementation of this SMP for long term management of remaining contamination, as required by the Environmental Easement, which includes plans for: (1) ECs and ICs, and (2) reporting;
3. Execution and recording of an Environmental Easement to restrict land use and prevent future exposure to any contamination remaining at the Site.

### 1.4.1 Remaining Contamination

Minor soil contamination remains at the Site; however, maintaining the Site cover and executing an Environmental Easement will achieve the remediation goals for the Site by restricting future site use to industrial and/or commercial. This will require a soil cover meeting the SCOs for industrial/commercial use, restricting groundwater use, and implementing this SMP.

If future development contemplates using Site groundwater as a source for potable or process water, the site owner must provide treatment to meet the water quality standards as directed by NYSDOH or SLCDOH. Additional monitoring and reporting will be required.

## Section 2

# Engineering and Institutional Control Plan

## 2.1 Introduction

### 2.1.1 General

Results from the SI conducted between June and August 2012 were compared to SCGs and evaluated for potential public health and environmental exposure routes. No significant environmental impacts were found and therefore, no remedial actions are necessary for the Site. The recommended actions for the Site were outlined in the March 2013 ROD and include the following:

1. Maintain existing Site cover which may consist either of the structures such as buildings, pavement, and sidewalks, or a soil cover;
2. Development and implementation of a SMP for long term management of remaining contamination, as required by the Environmental Easement, which includes plans for: (1) ECs and ICs, and (2) reporting;
3. Execution and recording of an Environmental Easement to restrict land use and prevent future exposure to any contamination remaining at the Site.

Since very low levels of contamination exists in the groundwater and soils at the Site, ECs and ICs are required to protect human health and the environment. This EC/IC Plan describes the procedures for the implementation and management of all EC/ICs at the Site.

### 2.1.2 Purpose

The purpose of this SMP is to provide:

- A description of all ECs/ICs on the Site;
- The basic operation and intended role of each implemented EC/IC;
- A description of the key components of the ECs/ICs created as stated in the ROD;
- A description of the features that should be evaluated during each periodic inspection and compliance certification period;
- A description of plans and procedures to be followed for implementation of ECs/ICs, such as the implementation of an Excavation Plan for the safe handling of remaining contamination that may be disturbed during maintenance or redevelopment work on the Site;
- Any other provisions necessary to identify or establish methods for implementing the ECs/ICs required by the site remedy, as determined by the NYSDEC; and
- A description of the reporting requirements for these controls.

## 2.2 Engineering Controls

### 2.2.1 Site Cover

Maintaining the existing site cover is an EC requirement in the ROD to prevent future exposure to soils in which the upper one foot of exposed surface soil will exceed the applicable SCOs. Adherence to these ECs on the Site is required by the ROD and will be implemented under this SMP. ECs may not be discontinued without approval from the NYSDEC.

A site cover currently exists and will be maintained to allow for industrial/commercial use of the site. Any site redevelopment will maintain a site cover, which may consist either of a structure such as buildings, pavement, sidewalks comprising the site development, or a soil cover. Where a soil cover is replaced or added, 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 (non-woven geotextile fabric, or equivalent), with the upper six inches of the soil of sufficient quality to maintain a vegetation layer. Any fill material brought to the site will meet the requirements for the identified site use as set forth in 6 NYCRR Part 375-6.7(d).

## 2.3 Institutional Controls

A series of ICs is required by the ROD to prevent future exposure to remaining soil and groundwater contamination. Adherence to these ICs on the Site is required by the ROD and will be implemented under this SMP. ICs may not be discontinued without approval from the NYSDEC. The ICs that apply to the Site are:

- The remedial party or site owner is required to complete and submit a periodic certification of ECs/ICs in accordance with Part 375-1.8 (h)(3) (a Periodic Review Report (PRR));
- The remedial party or site owner will be allowed to use and develop the Site for commercial and industrial purposes, as defined by Part 375-1.8(g), although land use will be subject to local zoning laws;
- The use of onsite groundwater as a source of potable or process water will be restricted, unless necessary water quality treatment is implemented. New York State Department of Health (NYSDOH) or the St. Lawrence County DOH (SLCDOH) will direct the water quality treatment requirements, and;
- The remedial party or site owner is required to comply with this NYSDEC-approved SMP.

## 2.4 Excavation Work Plan

The site remedy allows for commercial/industrial use. Any future intrusive work that will penetrate, encounter, or disturb the remaining contamination will be performed in compliance with this Excavation Work Plan (EWP). Intrusive construction work must also be conducted in accordance with the procedures defined in a Site Specific Health and Safety Plan (HASP) and Community Air Monitoring Plan (CAMP) (Appendix 1A of DER-10)\_ prepared by the contractor.

The parties preparing the remedial documents submitted to the NYSDEC, and parties performing this work, are completely responsible for the safe performance of all invasive work, the structural integrity of excavations, and for structures that may be affected by excavations (such as building foundations and footings).

### 2.4.1 Notification

At least 10 days prior to the start of any activity that is reasonably anticipated to encounter remaining contamination, the site owner or their representative will notify the NYSDEC. Currently, this notification will be made to:

Chief, Site Control Section  
 New York State Department of Environmental Conservation  
 Division of Environmental Remediation  
 625 Broadway  
 Albany, NY 12233-7020

This notification will include:

- A detailed description of the work to be performed, including the location and extent, plans for site re-grading, intrusive elements or utilities to be installed below the soil cover, or any work that may impact an engineering control (soil cover);
- A summary of environmental conditions anticipated in the work areas, including the nature and concentration levels of contaminants of concern, potential presence of grossly contaminated media, and plans for any pre-construction sampling;
- A schedule for the work, detailing the start and completion of all intrusive work;
- A statement that the work will be performed in compliance with this EWP and 29 CFR 1910.120;
- A copy of the contractor's HASP, in electronic format;
- Identification of disposal facilities for potential waste streams;
- Identification of sources of any anticipated backfill, along with all required chemical testing results;
- A groundwater handling plan for treatment and discharge of groundwater.

### 2.4.2 Soil Screening Methods

Visual, olfactory and instrument-based soil screening will be performed by a qualified environmental professional during all development excavations into known or potentially contaminated material (remaining contamination). Soil screening will be performed regardless of when the invasive work is executed and will include all excavation and invasive work performed during development, such as excavations for foundations and utility work, after issuance of the COC.

Soils will be segregated based on previous environmental data and screening results into material that requires off-site disposal, material that requires testing, material that can be returned to the subsurface, and material that can be used as cover soil.

### 2.4.3 Stockpile Methods

Soil stockpiles will be continuously encircled with a berm and/or silt fence. Hay bales will be used as needed near catch basins, surface waters and other discharge points. Stockpiles will be kept covered at all times with appropriately anchored tarps. Stockpiles will be routinely inspected and damaged

tarp covers will be promptly replaced. Stockpiles will be inspected at a minimum once each week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the Site and will be available for inspection by the NYSDEC.

#### **2.4.4 Materials Excavation and Load Out**

A qualified environmental professional or an individual under their supervision will oversee all invasive work and the excavation and load-out of all excavated material. The owner of the property and its contractors are solely responsible for the safe execution of all invasive and other work performed under this EWP.

The presence of utilities and easements on the Site will be investigated by the qualified environmental professional. It will be determined whether a risk or impediment to the planned work under this EWP is posed by utilities or easements on the Site.

Loaded vehicles leaving the Site will be appropriately lined, tarped, securely covered, manifested, and placarded in accordance with appropriate Federal, State, and local requirements (and all other applicable transportation requirements). Locations where vehicles enter or exit the Site shall be inspected daily for evidence of off-site soil tracking.

The qualified environmental professional will be responsible for ensuring that all egress points for truck and equipment transport from the Site are clean of dirt and other materials derived from the Site during intrusive excavation activities. Cleaning of the adjacent streets will be performed as needed to maintain a clean condition with respect to site-derived materials.

#### **2.4.5 Materials Transport Off-Site**

All transport of materials will be performed by licensed haulers in accordance with appropriate local, State, and Federal regulations, including 6 NYCRR Part 364. Haulers will be appropriately licensed and trucks properly placarded.

Material transported by trucks exiting the Site will be secured with tight-fitting covers. Loose-fitting canvas-type truck covers will be prohibited. If loads contain wet material capable of producing free liquid, truck liners will be used.

Truck transport routes will be identified that will: (a) limit transport through residential areas and past sensitive sites; (b) use city-mapped truck routes; (c) minimize off-site queuing of trucks entering the facility; (d) limit total distance to major highways; and (e) promote safety in access to highways. Egress points for truck and equipment transport from the Site will be kept clean of dirt and other materials during site remediation and development.

#### **2.4.6 Materials Disposal Off-Site**

All soil/fill/solid waste excavated and removed from the Site will be treated as contaminated and regulated material and will be transported and disposed of in accordance with all local, State (including 6 NYCRR Part 360) and Federal regulations. If disposal of soil/fill from this Site is proposed for unregulated off-site disposal (i.e. clean soil removed for development purposes), a formal request with an associated plan will be made to the NYSDEC. Unregulated off-site management of materials from this Site will not occur without formal NYSDEC approval.

Off-site disposal locations for excavated soils will be identified in the pre-excavation notification. This will include estimated quantities and a breakdown by class of disposal facility if appropriate, i.e.

hazardous waste disposal facility, solid waste landfill, petroleum treatment facility, C/D recycling facility, etc. Actual disposal quantities and associated documentation will be reported to the NYSDEC in the PRR. This documentation will include: waste profiles, test results, facility acceptance letters, manifests, bills of lading and facility receipts.

Non-hazardous historic fill and contaminated soils taken off-site will be handled, at a minimum, as a Municipal Solid Waste pursuant to 6 NYCRR Part 360-1.2. Material that does not meet the lower of the SCGs for residential use or groundwater protection will not be taken to a NYS recycling facility (6 NYCRR Part 360-16 Registration Facility) without a beneficial use determination issued by the NYSDEC.

### 2.4.7 Fluids Management

All liquids to be removed from the Site, including excavation dewatering, will be handled, transported and disposed of in accordance with applicable local, State, and Federal regulations.

### 2.4.8 Backfill from Off-Site Sources

All materials proposed for import onto the Site will be approved by the qualified environmental professional and the NYSDEC. All materials will be in compliance with applicable regulations (6 NYCRR 375-6.7(d)) and guidance (DER-10) prior to receipt at the Site. Material from industrial sites, spill sites, other environmental remediation sites, or potentially contaminated sites will not be imported to the Site. All imported soils will meet the backfill and cover soil quality standards established in 6 NYCRR 375-6.7(d). Soils that meet 'exempt' fill requirements under 6 NYCRR Part 360, but do not meet backfill or cover soil objectives for this Site, will not be imported onto the Site without prior approval by the NYSDEC. Solid waste will not be imported onto the Site.

Trucks entering the Site with imported soils will be securely covered with tight fitting covers. Imported soils will be stockpiled separately from excavated materials and covered to prevent dust releases.

### 2.4.9 Contingency Plan

If underground tanks or other previously unidentified contaminant sources are found during any future subsurface excavations or development related construction, excavation activities will be suspended until sufficient equipment is mobilized to address the condition. Sampling will be performed on product, sediment and surrounding soils, etc., as necessary to determine the nature of the material and proper disposal method. Chemical analysis will be performed for a full list of analytes (TAL metals; TCL volatiles and semi-volatiles, TCL pesticides and PCBs), unless the site history and previous sampling results provide a sufficient justification to limit the list of analytes. In this case, a reduced list of analytes will be proposed to the NYSDEC for approval prior to sampling.

Identification of unknown or unexpected contaminated media identified by screening during invasive site work will be promptly communicated by phone to NYSDEC's Project Manager. Reportable quantities of petroleum product will also be reported to the NYSDEC spills hotline. These findings will be also included in daily and periodic electronic media reports.

### 2.4.10 Dust Control Plan

A dust suppression plan that addresses dust management during invasive on-site work will include, at a minimum, the items listed below:

- Dust suppression will be achieved through the use of a dedicated on-site water truck for road wetting or other dust suppression techniques as approved by the NYSDEC. The truck will be equipped with a water cannon capable of spraying water directly onto off-road areas including excavations and stockpiles.
- Any work conducted pursuant to the excavation work plan must also be conducted in accordance with the procedures defined in site-specific HASP and CAMP prepared for the site in current compliance with DER-10, 29 CFR 1910, 29 CFR 1926, and all other applicable Federal, State and local regulations.

## 2.5 Inspections and Notifications

### 2.5.1 Periodic Inspections

A comprehensive site-wide inspection will be conducted annually, regardless of the frequency of the PRR. The inspections will determine and document the following:

- Whether ECs continue to perform as designed;
- If these controls continue to be protective of human health and the environment;
- Compliance with requirements of this SMP and the ROD;
- Achievement of remedial action objectives;
- Sampling and analysis of appropriate media during monitoring events (applicable if a groundwater treatment system is constructed);
- If site records are complete and up to date; and
- Changes, or needed changes, to the remedial or monitoring system;

If an emergency, such as a natural disaster or an unforeseen failure of any of the ECs occurs, an inspection of the Site will be conducted within 5 days of the event to verify the effectiveness of the EC/ICs implemented at the Site by a qualified environmental professional as determined by the NYSDEC.

### 2.5.2 Notifications

Notifications will be submitted by the property owner to the NYSDEC, as needed, for the following reasons:

- 60-day advance notice of any proposed changes in site use that are required under the terms of the ROD, 6 NYCRR Part 375, and/or Environmental Conservation Law.
- 10-day advance notice of any proposed ground-intrusive activities.
- Notice within 48-hours of any damage or defect to the foundations or structures that reduces or has the potential to reduce the effectiveness of other ECs and likewise any action to be taken to mitigate the damage or defect.

- Notice within 48-hours of any emergency, such as a fire, flood, or earthquake that reduces or has the potential to reduce the effectiveness of ECs in place at the Site, including a summary of actions taken, or to be taken, and the potential impact to the environment and the public.
- Follow-up status reports on actions taken to respond to any emergency event requiring ongoing responsive action shall be submitted to the NYSDEC within 45 days and shall describe and document actions taken to restore the effectiveness of the ECs.

Notifications will be made to:

Chief, Site Control Section  
 New York State Department of Environmental Conservation  
 Division of Environmental Remediation  
 625 Broadway  
 Albany, NY 12233-7020

In the event that the NYSDEC develops a centralized notification system, that system will be used instead.

### 2.5.3 Evaluation and Reporting

The results of the inspection and site monitoring data will be evaluated as part of the EC/IC certification to confirm that the:

- EC/ICs are in place, are performing properly, and remain effective;
- The Monitoring Plan is being implemented if a groundwater treatment system is constructed for a potable water source;
- O&M activities are being conducted properly if a groundwater treatment system is constructed for a potable water source; and, based on the above items,
- The site remedy continues to be protective of public health and the environment and is performing as designed.

## 2.6 Reporting Plan

### 2.6.1 Periodic Review Report

A PRR is submitted annually, or at another frequency approved by the NYSDEC, to the NYSDEC Central Office in Albany, New York. The report is submitted within 45 days of the end of each certification period. Other reports, such as validated groundwater treatment monitoring data (if constructed), will be submitted through the EDD format. Media sampling results will also be incorporated into the PRR. The report will include:

- EC/IC certification;
- All applicable inspection forms and other records generated for the Site during the reporting period;
- A summary of any discharge monitoring data (required if a groundwater treatment system is constructed) and/or information generated during the reporting period with comments and conclusions;

- Data summary tables and graphical representations of contaminants of concern by media (groundwater, soil vapor), which include a listing of all compounds analyzed, along with the applicable standards, with all exceedances highlighted. These will include a presentation of past data sufficient for the NYSDEC to evaluate contaminant concentration trends (required if a groundwater treatment system is constructed);
- Results of all analyses, copies of all laboratory data sheets, and the required laboratory data deliverables for all samples collected during the reporting period will be submitted as an electronic data deliverable (EDD) in a NYSDEC-approved format (required if a groundwater treatment system is constructed);
- A performance summary for all treatment systems at the Site during the calendar year (required if a groundwater treatment system is constructed), including information such as:
  - The number of days the system was run for the reporting period;
  - The average, high, and low flows per day;
  - The contaminant mass removed;
  - A description of breakdowns and/or repairs along with an explanation for any significant downtime;
  - A description of the resolution of performance problems;
  - A summary of the performance and/or effectiveness monitoring; and
  - Comments, conclusions, and recommendations based on data evaluation.
- A site evaluation, which includes the following:
  - The compliance of the remedy with the requirements of the site-specific ROD;
  - The operation and the effectiveness of all treatment units (required if a groundwater treatment system is constructed), etc., including identification of any needed repairs or modifications;
  - Any new conclusions or observations regarding site contamination based on inspections or data generated by the Monitoring Plan for the media being monitored;
  - Recommendations regarding any necessary changes to the remedy and/or Monitoring Plan; and
  - The overall performance and effectiveness of the remedy.

### 2.6.2 Certification of Engineering and Institutional Controls

Inspection of the EC/ICs will occur annually. After the last inspection of the reporting period, a Professional Engineer licensed to practice in NYS will prepare a PRR which certifies that:

- On-site ECs/ICs are unchanged from the previous certification;
- They remain in-place and are effective;

- The systems are performing as designed;
- Nothing has occurred that would impair the ability of the controls to protect the public health and environment;
- Access is available to the Site by the NYSDEC and the NYSDOH to evaluate continued maintenance of such controls; and
- Site use is compliant with the Environmental Easement.

## Section 3

# Monitoring Plan

### 3.1 Introduction

#### 3.1.1 General

The Monitoring Plan describes the measures for evaluating the performance and effectiveness of the remedy to reduce or mitigate contamination at the Site. This Monitoring Plan only covers the requirements of the annual site inspection, and may only be revised with the approval of the NYSDEC.

In the event future development of the Site contemplates usage of onsite groundwater for either potable or process water, the site owner must provide treatment to meet the water quality standards as directed by NYSDOH or SLCDOH. As part of this future development, the remedial party or Site owner must submit and implement a Monitoring Plan for the groundwater treatment system.

#### 3.1.2 Purpose and Schedule

This Monitoring Plan describes the methods to be used for:

- Assessing achievement of the remedial action objectives;
- Evaluating site information periodically to confirm protection of public health and the environment; and
- Preparing the necessary reports for the monitoring activities.

### 3.2 Site-Wide Inspection

Site-wide inspections will be performed on a regular schedule at a minimum of once a year. Site-wide inspections will also be performed after all severe weather conditions that may affect ECs. During these inspections, an inspection form will be completed (Appendix B). The form will compile sufficient information to assess the following:

- Compliance with all ICs, including site usage;
- An evaluation of the condition and continued effectiveness of ECs;
- General site conditions at the time of the inspection;
- The site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection; and
- Confirm that site records are up to date.

### 3.3 Monitoring Reporting Requirements

Forms and any other information generated during regular monitoring events and inspections will be kept on file with the County and NYSDEC. All forms, and other relevant reporting formats used during

the monitoring/inspection events, will be; (1) subject to approval by the NYSDEC; and (2) submitted at the time of the PRR, as specified in the Reporting Plan of this SMP.

All monitoring results will be reported to the NYSDEC on a periodic basis in the PRR. The report will include, at a minimum:

- Date of event;
- Personnel conducting inspection;
- Description of the activities performed;
- Copies of all field forms completed (e.g., inspection form, photo logs, etc.);
- A figure illustrating locations of any areas with insufficient soil cover;
- Any observations, conclusions, or recommendations; and
- A determination as to whether soil cover conditions have changed since the last reporting event.

Data will be reported in hard copy or digital format as determined by the NYSDEC. A summary of the monitoring program deliverables are summarized in Table 3-1 below.

**Table 3-1 Schedule of Inspection and Reporting Program**

Task	Inspection and Reporting Frequency*
Site Inspection	Annually
Periodic Review Report	Annually

\* The frequency of events will be conducted as specified until otherwise approved by NYSDEC

## Section 4

# Inspections, Reporting, and Certifications

## 4.1 Site Inspections

### 4.1.1 Inspection Frequency

All inspections will be conducted at the frequency specified in the schedules provided in Section 3, Monitoring Plan, of this SMP. At a minimum, a Site-wide inspection will be conducted annually. Inspections of remedial components will also be conducted whenever a severe condition has taken place, such as an erosion or flooding event that may affect the ECs.

If future Site development contemplates usage of Site groundwater as a source for potable or process water, the site owner must submit a separate O&M Plan including inspection requirements and frequency to NYSDEC for approval.

### 4.1.2 Inspection Forms, Sampling Data, and Maintenance Reports

All inspections will be recorded on the Site Cover Inspection Form (Appendix B), which includes a general site inspection. These forms are subject to NYSDEC revision.

All applicable inspection forms and other records generated for the site during the reporting period will be provided in electronic format in the PRR.

If future site development contemplates usage of groundwater as a source for potable or process water, the site owner will submit all applicable inspection forms, discharge monitoring reports, and other records generated for the groundwater treatment facility. All forms, reports, and records will be provided in electronic format in the PRR.

### 4.1.3 Evaluation of Records and Reporting

The results of the inspection and Site monitoring data will be evaluated as part of the EC/IC certification to confirm that the:

- EC/ICs are in place, are performing properly, and remain effective;
- The Monitoring Plan is being implemented for a groundwater treatment system, if required;
- O&M activities are being conducted properly (required if a groundwater treatment system is constructed); and, based on the above items,
- The Site remedy continues to be protective of public health and the environment and is performing as designed.

## 4.2 Periodic Review Report

A PRR will be submitted to the NYSDEC annually. In the event that the Site is subdivided into separate parcels with different ownership, a single PRR will be prepared to address the Site. The report will be prepared in accordance with NYSDEC DER-10 and submitted within 45 days of the end of each

certification period. Media sampling results will also be incorporated into the PRR. The report will include the following:

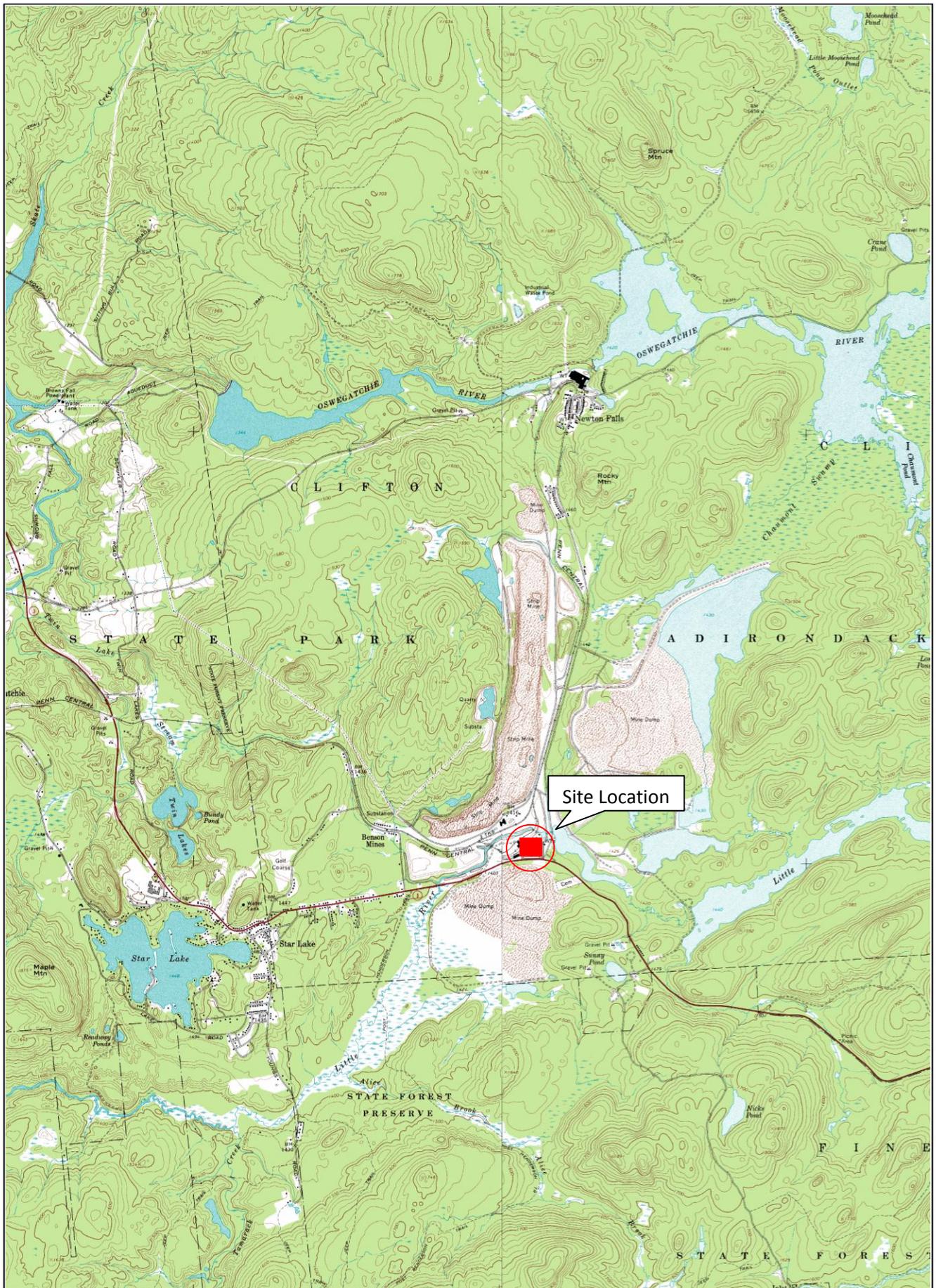
- Identification, assessment and certification of all ECs/ICs required by the remedy for the Site;
- Results of the required annual site inspections and severe condition inspections, if applicable;
- All applicable inspection forms and other records generated for the Site during the reporting period in electronic format;
- A summary of any discharge monitoring data (applicable if a groundwater treatment system is constructed) and/or information generated during the reporting period with comments and conclusions;
- Data summary tables and graphical representations of contaminants of concern by media (groundwater, soil, or vapor), which include a listing of all compounds analyzed, along with the applicable standards, with all exceedances highlighted (required if a groundwater treatment system is constructed). These will include a presentation of past data as part of an evaluation of contaminant concentration trends;
- Results of all analyses, copies of all laboratory data sheets, and the required laboratory data deliverables for all samples collected during the reporting period will be submitted electronically in a NYSDEC-approved format;
- A Site evaluation, which includes the following:
  - The compliance of the remedy with the requirements of the site-specific ROD;
  - The operation and the effectiveness of all treatment units, etc., including identification of any needed repairs or modifications;
  - Any new conclusions or observations regarding site contamination based on inspections or data generated by the Monitoring Plan for the media being monitored;
  - Recommendations regarding any necessary changes to the remedy and/or Monitoring Plan; and
  - The overall performance and effectiveness of the remedy.
- A performance summary for all treatment systems that may be operating at the Site during the calendar year, including information such as:
  - The number of days the system was running for the reporting period;
  - The average, high, and low flows per day;
  - The contaminant mass removed;
  - A description of breakdowns and/or repairs along with an explanation for any significant downtime;
  - A description of the resolution of performance problems;

- A summary of the performance, effluent and/or effectiveness monitoring; and
- Comments, conclusions, and recommendations based on data evaluation.

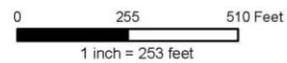
The PRR will be submitted, in electronic format, to the NYSDEC Central Office.

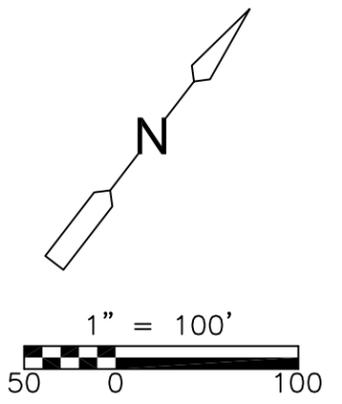
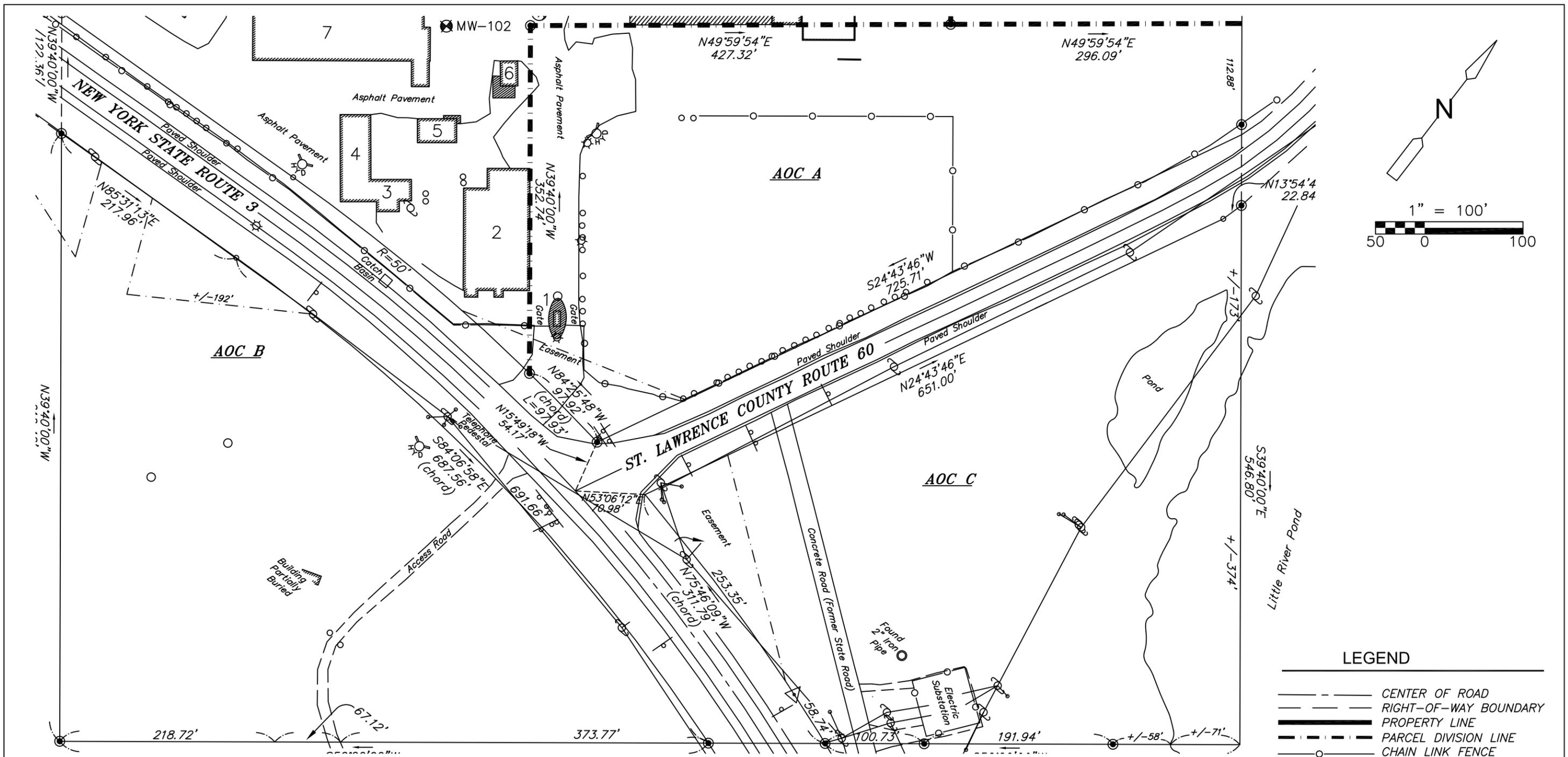
### 4.3 Corrective Measures Plan

If any component of the remedy is found to have failed, or if the periodic certification cannot be provided due to the failure of an EC/IC, a corrective measures plan will be submitted to the NYSDEC for approval. This plan will explain the failure and provide the details and schedule for performing work necessary to correct the failure. Unless an emergency condition exists, no work will be performed pursuant to the corrective measures plan until it is approved by the NYSDEC.



St. Lawrence County, New York  
 Site Location Plan  
 Figure 1-1





**LEGEND**

	CENTER OF ROAD
	RIGHT-OF-WAY BOUNDARY
	PROPERTY LINE
	PARCEL DIVISION LINE
	CHAIN LINK FENCE
	EDGE OF BUILDING
	EDGE OF GRAVEL SURFACE
	SHORE OR EDGE OF WATER
	UTILITY LINE AND POLE

- NOTES:**
- 1) North arrow and bearings shown hereon are based on New York State Grid North as determined by GPS observations in June 2000.
  - 2) Horizontal datum is NAD83 New York State Plane East Zone. Vertical datum is NAVD88.



New York State Department of Environmental Conservation  
 St. Lawrence County Planning Office  
 Former Jones & Laughlin 18-Acre Site  
 Town of Clifton, New York

DATE SEPT 2012

SITE PLAN

FIGURE NO.  
1-2

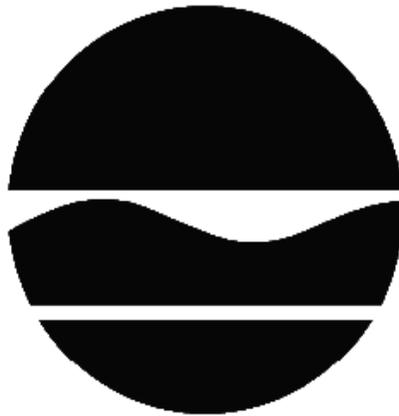
# **Appendix A**

## **Record of Decision**

# RECORD OF DECISION

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Former Jones & Laughlin Ore Processing  
Environmental Restoration Project  
Clifton, St Lawrence County  
Site No. E645029  
March 2013



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

# **DECLARATION STATEMENT - RECORD OF DECISION**

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Former Jones & Laughlin Ore Processing  
Environmental Restoration Project  
Clifton, St Lawrence County  
Site No. E645029  
March 2013

## **Statement of Purpose and Basis**

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

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the Former Jones & Laughlin Ore Processing 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:

Based on the results of the investigation at the site and the evaluation presented here, the Department is proposing Site Management as the remedy for the site. The findings of the investigation of this site indicate that the site does not pose a threat to human health or the environment. This remedy complies with the New York State standards, criteria, and guidance. No actions are required beyond the controls discussed below:

### **1. Site Cover**

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. Any fill material brought to the site will meet the requirements for the identified site use as set forth in 6 NYCRR Part 375-6.7(d).

## 2. Institutional Control

Imposition of an institutional control in the form of an environmental easement or environmental notice 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; and
- requires compliance with the Department approved Site Management Plan.

## 3. Site Management Plan

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

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: Limiting future development to commercial and industrial use.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations on the controller property;
- descriptions of the provisions of the environmental easement or environmental notice including any land use and groundwater use restrictions;
- maintaining site access controls and Department notification; and
- the steps necessary for the periodic reviews and certification of the institutional 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.

March 30, 2013



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Date

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

# RECORD OF DECISION

Former Jones & Laughlin Ore Processing  
Clifton, St Lawrence County  
Site No. E645029  
March 2013

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## **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. Based on the findings of the investigation of the site the past disposal of contaminants at the site does not pose a threat to public health and the environment. Therefore, the selected remedy is Site Management. 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:

Town of Fine Municipal Building  
4078 State Highway 3

Star Lake, NY 13690  
Phone: 315-848-3121

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 site consists of three parcels totaling 18-acres located at the intersection of New York State Route 3 (Route 3) and County Route 60 (CR 60) in the Town of Clifton, New York.

**Site Features:** The 18 acre site is a portion of the former Jones and Laughlin iron ore processing facility (J&L) located in the vicinity of Route 3 and CR 60, which divide the property into three distinct areas of concern (AOCs).

AOC A is approximately 5.8 acres in area and is located north/north west of the intersection of NYS Route 3 and CR 60. This area is primarily flat and consists of the former parking lot and the former vehicle wash station.

AOC B is approximately 6.34 acres in size and is south of the intersection between Route 3 and CR 60. This area consists primarily of a wooded area with the large tailing pile from previous mining operations occupying about one-third of the southern portion of the AOC. Reportedly, the former mine construction camp was located in this AOC.

AOC C is approximately 5.86 acres in size and is located east of the intersection of Route 3 and CR 60. This area consists of an active electrical substation, overhead power lines, a stretch of concrete road, and a pond. The Little River flows across the eastern corner of this AOC.

**Current Zoning and Land Use:** The site is currently vacant, with the exception of the active electrical substation on AOC C. The entire parcel is zoned for industrial use. Abutting properties

are owned by Benson Mines Trust and are heavily wooded.

Past Use of the Site: Until the mine closed in the mid 70's AOC A was the former parking lot and vehicle wash station. A portion of AOC B received mine tailings and was the location of the former construction camp in the 1940's. An electrical substation and road paint test area are currently located in AOC C

Site Geology and Hydrogeology: Surface water runoff at the site primarily drains to the north toward the Little River. Groundwater flows predominantly north toward the Little River. Depth to groundwater ranged from 15 to 36 feet below ground surface, across the three AOC's.

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.

No PRPs have been documented to date.

Since no viable PRPs have been identified, there are currently no ongoing enforcement actions. However, legal action may be initiated at a future date by the state to recover state response costs should PRPs be identified. St. Lawrence County will assist the state in its efforts by providing all information to the state which identifies PRPs. St. Lawrence 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
- sediment

#### **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 at this site is/are:

PCB-AROCLOR 1254  
ARSENIC

BERYLLIUM

Based on the investigation results, comparison to the SCGs, and an evaluation of potential public health and environmental exposure routes, no remediation is required for this site. More complete information can be found in the RI Report and Exhibit A.

## **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.

Nature and Extent of Contamination:

Based upon the investigations conducted to date, the primary contaminant of concern is Aroclor-1254 (aka polychlorinated biphenyl, PCB).

Soil – Aroclor-1254 is found in surface soil in AOC A and AOC B. Concentrations of Aroclor-1254 found on-site (up to .210 ppm) slightly exceed the soil cleanup objectives for unrestricted use (0.1 ppm), not the commercial SCO of 1 ppm.

Groundwater - Metals concentrations above the Ambient Water Quality Standards (AWQS) were detected in every monitoring well sampled. Iron and manganese most consistently exceeded AWQS where elevated turbidity levels were observed during groundwater sampling, which can result in increased metals concentrations in 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*.

The site is not fenced and persons who enter the site could contact residual contaminants in the soil by walking on the soil, digging or otherwise disturbing the soil. People are not drinking the contaminated groundwater because the area is served by a public water supply that obtains water from a different source.

## **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.

### **Soil**

#### **RAOs for Public Health Protection**

- Prevent ingestion/direct contact with contaminated soil.

## **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 Site Management remedy.

The estimated present worth cost to implement the remedy is \$40,000. The cost to construct the remedy is estimated to be \$0 and the estimated average annual cost is \$2,600.

The elements of the selected remedy are as follows:

Based on the results of the investigation at the site and the evaluation presented here, the Department is proposing Site Management as the remedy for the site. The findings of the investigation of this site indicate that the site does not pose a threat to human health or the environment. This remedy is effective in protecting human health and the environment and complies with the New York State standards, criteria, and guidance. No actions are required beyond the controls discussed below:

### 1. Site Cover

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. Any fill material brought to the site will meet the requirements for the identified site use as set forth in 6 NYCRR Part 375-6.7(d).

### 2. Institutional Control

Imposition of an institutional control in the form of an environmental easement or environmental notice 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; and
- requires compliance with the Department approved Site Management Plan.

### 3. Site Management Plan

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

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: Limiting future development to commercial and industrial use.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations on the controller property;
- descriptions of the provisions of the environmental easement or environmental notice including any land use and groundwater use restrictions;
- maintaining site access controls and Department notification; and
- the steps necessary for the periodic reviews and certification of the institutional controls.

## Exhibit A

### 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 for which contamination was identified, 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 three categories; 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 4 and Section 6.1.1 are also presented.

### Groundwater

Groundwater samples were collected during the August 2012 sampling event for each of the three AOCs. Data is presented in Table 1. Groundwater sample results were compared to the Technical Operations and Guidance Series (TOGS) 1.1.1 - Ambient Water Quality Standards (AWQS). Of the nine wells sampled in the three AOCs, there were no recorded detections of volatile organic compounds (VOCs) or polychlorinated biphenyls (PCBs). There was one detection of a SVOC at AOC-C-MW2-D and wide-spread metals exceedances in all wells sampled across the Site.

**Table 1 - Groundwater**

Detected Constituents	Concentration Range Detected (ppb) <sup>a</sup>	SCG <sup>b</sup> (ppb)	Frequency Exceeding SCG
<b>SVOCs</b>			
4-Nitroaniline	ND - 13	5	1 of 9
<b>Inorganics</b>			
Arsenic	ND - 45	25	2 of 9
Beryllium	ND - 11	3	4 of 9
Chromium	ND - 53	50	1 of 9
Copper	1.6 - 830	200	2 of 9
Iron	160 - 203,000	300	7 of 9
Manganese	21 - 39,900	300	7 of 9
Nickel	13 - 1,400	100	4 of 9
Selenium	ND - 12	10	2 of 9

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

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

Groundwater samples were collected for each of the three areas of concern. There were no recorded detections of VOCs or PCBs. One SVOC was detected above SCGs.

Metals concentrations above the Ambient Water Quality Standards (AWQS) were detected in every monitoring well sampled. Iron and manganese most consistently exceeded AWQS where elevated turbidity levels were observed during groundwater sampling, which can result in increased metals concentrations in groundwater.

Based on the findings of the RI, there are elevated levels of metals in 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: arsenic and beryllium.

### Soil

Surface and subsurface soil samples were collected at the site during the SI. Surface soil samples were collected from a depth of 0-6 inches to assess direct human exposure. Subsurface soil samples were collected from a depth of 12-34 feet to assess soil contamination impacts to groundwater. The results indicate that soils at the site exceed the unrestricted SCG for semi-volatile organics, metals and PCBs.

Locations of surface soil and subsurface soil exceedances are shown on Figures 4, 5, and 6.

**Table 2 - Soil**

Detected Constituents	Concentration Range Detected (ppm) <sup>a</sup>	Unrestricted SCG <sup>b</sup> (ppm)	Frequency Exceeding Unrestricted SCG	Restricted Use SCG <sup>c</sup> (ppm)	Frequency Exceeding Restricted SCG
<b>SVOCs</b>					
Benzo(a)anthracene	ND – 1.8	1	1 of 15	1	1 of 15
Benzo(b)fluoranthene	ND – 5.4	1	1 of 15	1	1 of 15
Benzo(k)fluoranthene	ND – 2.2	0.80	1 of 15	3.9	0 of 15
Chrysene	ND – 2.2	1	1 of 15	39	0 of 15
Dibenzo(a,h)anthracene	ND - 0.56	0.33	1 of 15	0.33	1 of 15
<b>Inorganics</b>					
Barium	133 - 469	350	3 of 15	400	1 of 15
Copper	31.4 – 88.7	50	11 of 15	270	0 of 15
Zinc	15.4 - 182	109	2 of 15	10,000	0 of 15
<b>Pesticides/PCBs</b>					
Aroclor-1254	ND – 0.21	0.1	3/20	1	0/20

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.

The primary soil contaminant is PCBs associated with the operation of the former steel mine. As noted on Figure 2, the primary soil contamination is generally found at levels below residential SCOs across the site.

Metals detected in soil are considered to be naturally occurring and are not contaminants of concern. SVOCs detected above the Unrestricted Use SCO were detected in the former parking lot and are likely related to this area being historically paved and are not considered contaminants of concern.

Based on the findings of the Remedial Investigation, the presence of Aroclor-1254 (PCB) has resulted in the contamination of soil. The site contaminant identified in soil which is considered to be the primary contaminant of concern, to be addressed by the remedy selection process is Arocolor-1254 (PCB).

### Sediments

A sediment sample was collected during the RI from the on-site pond on AOC-C. The sample as collected to assess the potential for impacts to the pond. The results indicate that sediment in the on-site pond exceed the Department’s SCGs for sediment for iron. The sample location is shown on Figure 3.

**Table 3 - Sediment**

Detected Constituents	Concentration Range Detected (ppm) <sup>a</sup>	SCG <sup>b</sup> (ppm)	Frequency Exceeding SCG
<b>Inorganics</b>			
Iron	4800 (48%)	LEL – 2.00%	1 of 1
		SEL – 4.00%	1 of 1

a - ppm: parts per million, which is equivalent to milligrams per kilogram, mg/kg, in sediment;

b - SCG: The Department’s A Technical Guidance for Screening Contaminated Sediments. @

LEL = Lowest Effects Level and SEL = Severe Effects Level. Sediment is considered contaminated if either of these criteria is exceeded. If the SEL criteria are exceeded, the sediment is severely impacted. If only the LEL is impacted, the impact is considered moderate.

A sediment sample was collected from the pond located on AOC-C. One exceedance, for iron, was observed for the metals screening criteria. This sample was collected hydraulically up gradient of the main plant site and mining operations. Iron is known to be naturally occurring in the region.

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

## Exhibit B

### 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.

#### **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.

#### **Alternative 2: Site Management**

The Site Management Alternative requires only institutional controls for 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.

*Present Worth:* ..... \$40,000  
*Capital Cost:* ..... \$0  
*Annual Costs:* ..... \$2,600

#### **Alternative 3: Restoration to Pre-Disposal or Unrestricted Conditions**

This alternative achieves all of the SCGs discussed in Section 6.1.1 and Exhibit A. Soil meets the unrestricted soil clean objectives listed in Part 375-6.8 (a). This alternative would include: Additional sampling to delineate the vertical and horizontal extent of contamination, and excavation and off-site disposal of soil containing at concentrations of any compound exceeding Unrestricted SCGs.

*Capital Cost:* ..... \$1,360,000

**Exhibit C****Remedial Alternative Costs**

<b>Remedial Alternative</b>	<b>Capital Cost (\$)</b>	<b>Annual Costs (\$)</b>	<b>Total Present Worth (\$)</b>
No Action	0	0	0
Site Management	0	\$2,600	\$40,000
Restoration to Pre-Disposal or Unrestricted Conditions	\$1,360,000	\$0	\$1,360,000

## Exhibit D

### SUMMARY OF THE SELECTED REMEDY

The Department is proposing Alternative 2, Site Management as the remedy for this site. Alternative 2 will achieve the remediation goals for the site by restricting future use to commercial, requiring a soil cover meeting the SCOs for commercial use, restricting groundwater use, and implementing a Site Management Plan. The elements of this remedy are described in Section 7.

#### Basis for Selection

The selected remedy is based on the results of the SI 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 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.

Alternative 2 will satisfy this criterion by implementing institutional controls to prevent contact with contaminated soil and groundwater. Alternative 1 (No Action) does not provide any protection to public health and the environment and will not be evaluated further. Alternative 3, by removing all soil contaminated above the Unrestricted soil cleanup objective, meets the threshold criteria. Alternative 2 also complies with this criterion but to a lesser degree or with lower certainty.

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.

Alternative 2 complies with SCGs to the extent practicable. It addresses residual contamination and complies with the restricted use soil cleanup objectives at the surface through implementation of an institutional control. Alternative 3 also complies with this criterion through removal of residual contamination. Because Alternatives 2 and 3 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 the alternative that involves excavation of the contaminated overburden soils (Alternative 3). Since most of the contamination is in the surface soil, Alternative 3 results in removal of almost all of the chemical contamination at the site and removes the need for property use restrictions and long-term monitoring. For Alternative 2, site management remains effective, but it will not be as desirable in the long-term.

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.

Alternative 2 will control potential exposures with institutional controls only and will not reduce the toxicity, mobility or volume of contaminants remaining. Alternative 3, excavation and off-site disposal, reduces the toxicity, mobility and volume of on-site waste by transferring the material to an approved off-site location. However, depending on the disposal facility, the volume of the material would not be reduced.

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 2 and 3 all have short-term impacts which could easily be controlled, however, Alternative 2 will have the smallest impact. The time needed to achieve the remediation goals is the shortest for Alternative 2 and longer for Alternative 3.

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.

Alternative 2 is favorable because it is readily implementable as no additional mobilization of heavy equipment to the site is necessary. Alternative 3 is also implementable, but the volume of soil excavated under this alternative would necessitate increased truck traffic on local roads for several months. In addition, heavy equipment would need to be mobilized to the site to perform additional sampling.

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. Alternative 2 has a low cost, but the contaminated soil and groundwater will not be addressed other than by institutional controls. With its large volume of soil to be handled, Alternative 3 (excavation and off-site disposal) would have the highest present worth cost.

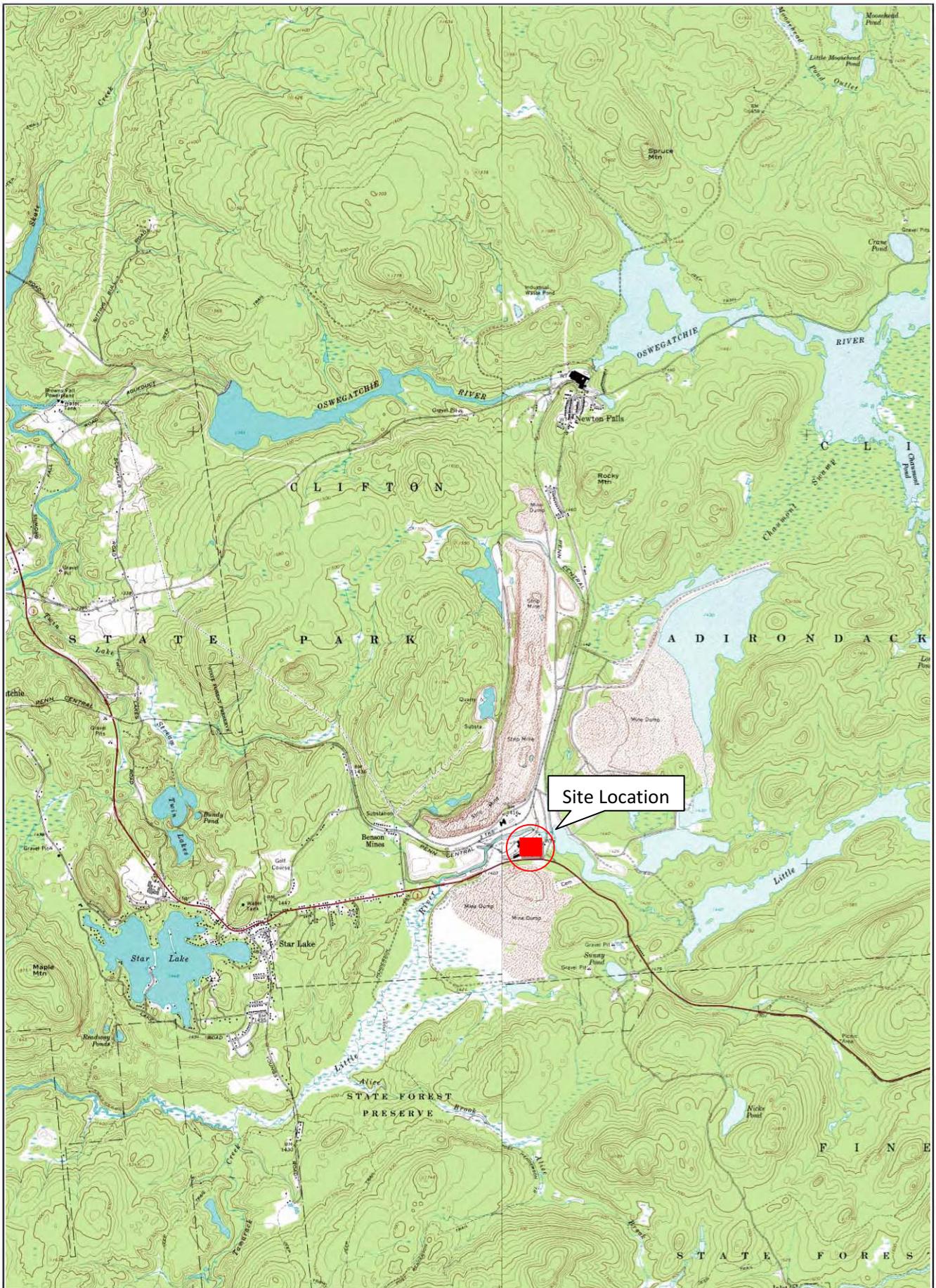
8. Land Use. When cleanup to pre-disposal conditions is determined to be infeasible, the Department may consider the current, intended, and reasonable anticipated future land use of the site and its surroundings in the selection of the soil remedy.

Since the anticipated use of the site is commercial, Alternative 2 will be less desirable because impacted soil will require management during future redevelopment. However, the residual contamination with Alternative 2 will be controllable with implementation of a Site Management Plan and commercial use will not be prohibited. With Alternative 3, removing all of the contaminated soil above Unrestricted SCOs would be removed and restrictions on the site use would not be necessary.

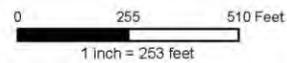
The final criterion, Community Acceptance, is considered a "modifying criterion" and is taken into account after evaluating those above. It is evaluated after public comments on the Proposed Remedial Action Plan have been received.

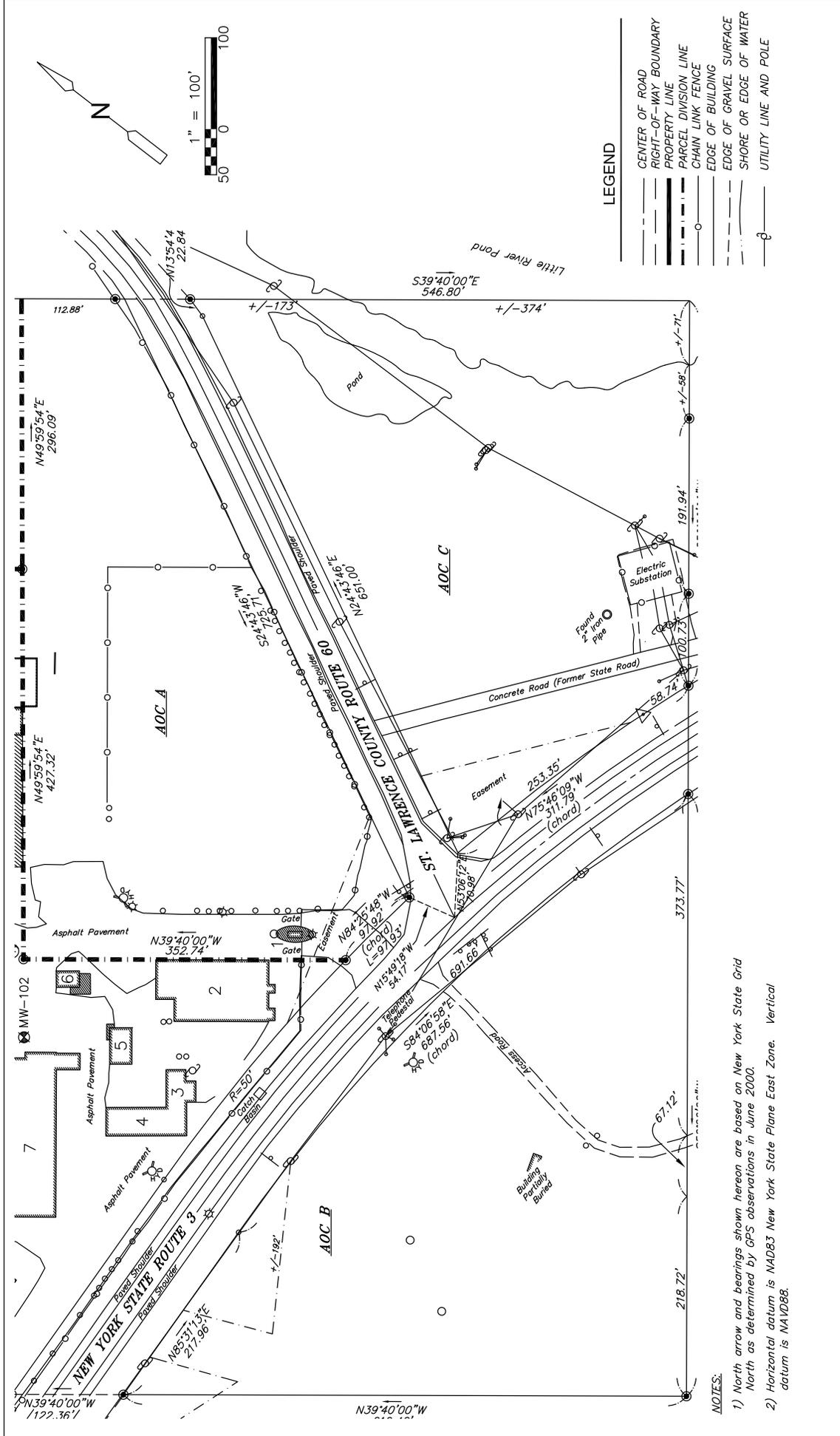
9. Community Acceptance. Concerns of the community regarding the investigation, the evaluation of alternatives, and the PRAP are evaluated. A responsiveness summary will be prepared that describes public comments received and the manner in which the Department will address the concerns raised. If the selected remedy differs significantly from the proposed remedy, notices to the public will be issued describing the differences and reasons for the changes.

Alternative 2 is being selected because, as described above, it satisfies the threshold criteria and provides the best balance of the balancing criterion.



St. Lawrence County, New York  
 Site Location Plan  
 Figure 1





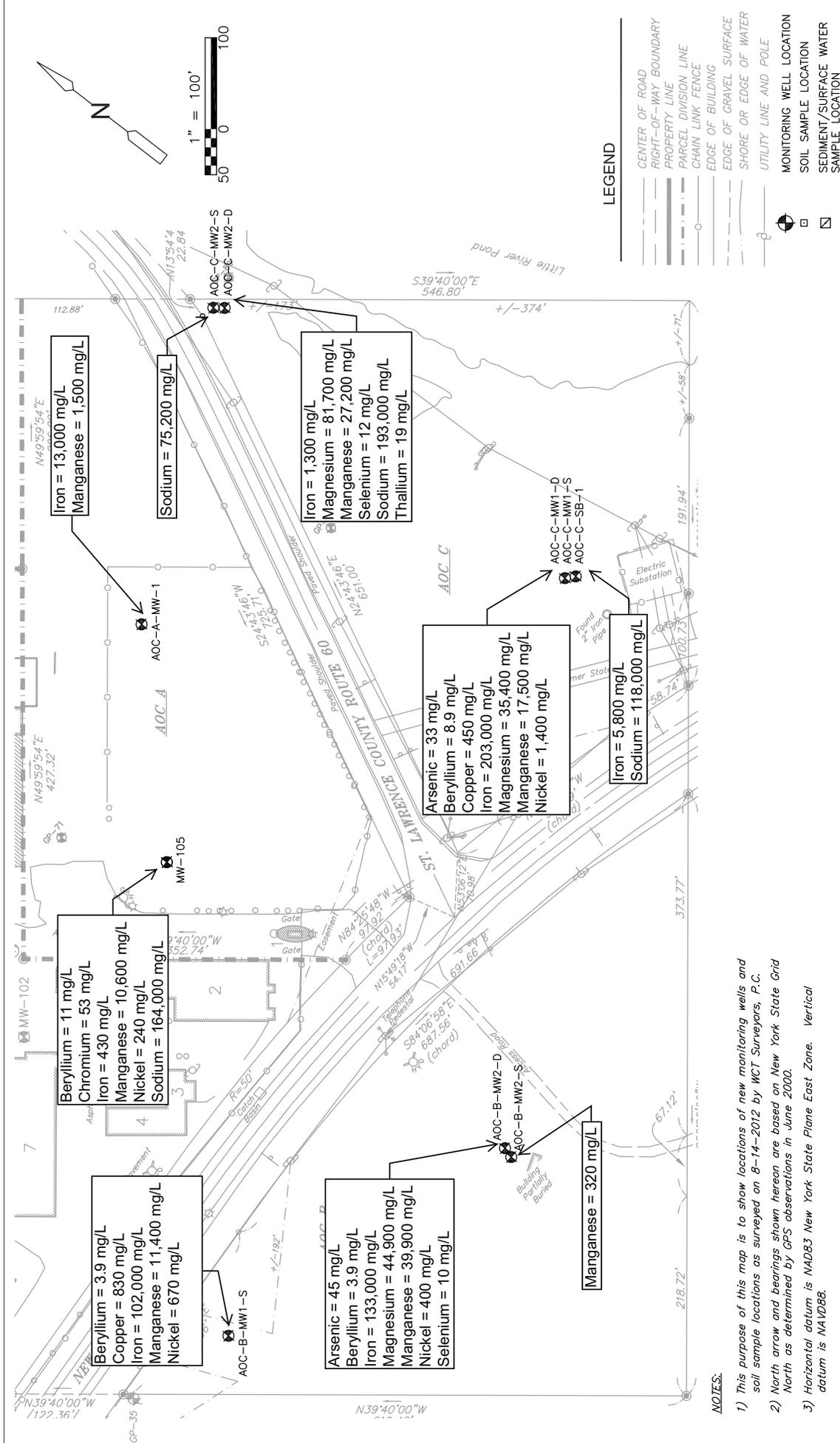
**LEGEND**

- CENTER OF ROAD
- - - RIGHT-OF-WAY BOUNDARY
- PROPERTY LINE
- PARCEL DIVISION LINE
- - - CHAIN LINK FENCE
- EDGE OF BUILDING
- - - EDGE OF GRAVEL SURFACE
- - - SHORE OR EDGE OF WATER
- UTILITY LINE AND POLE

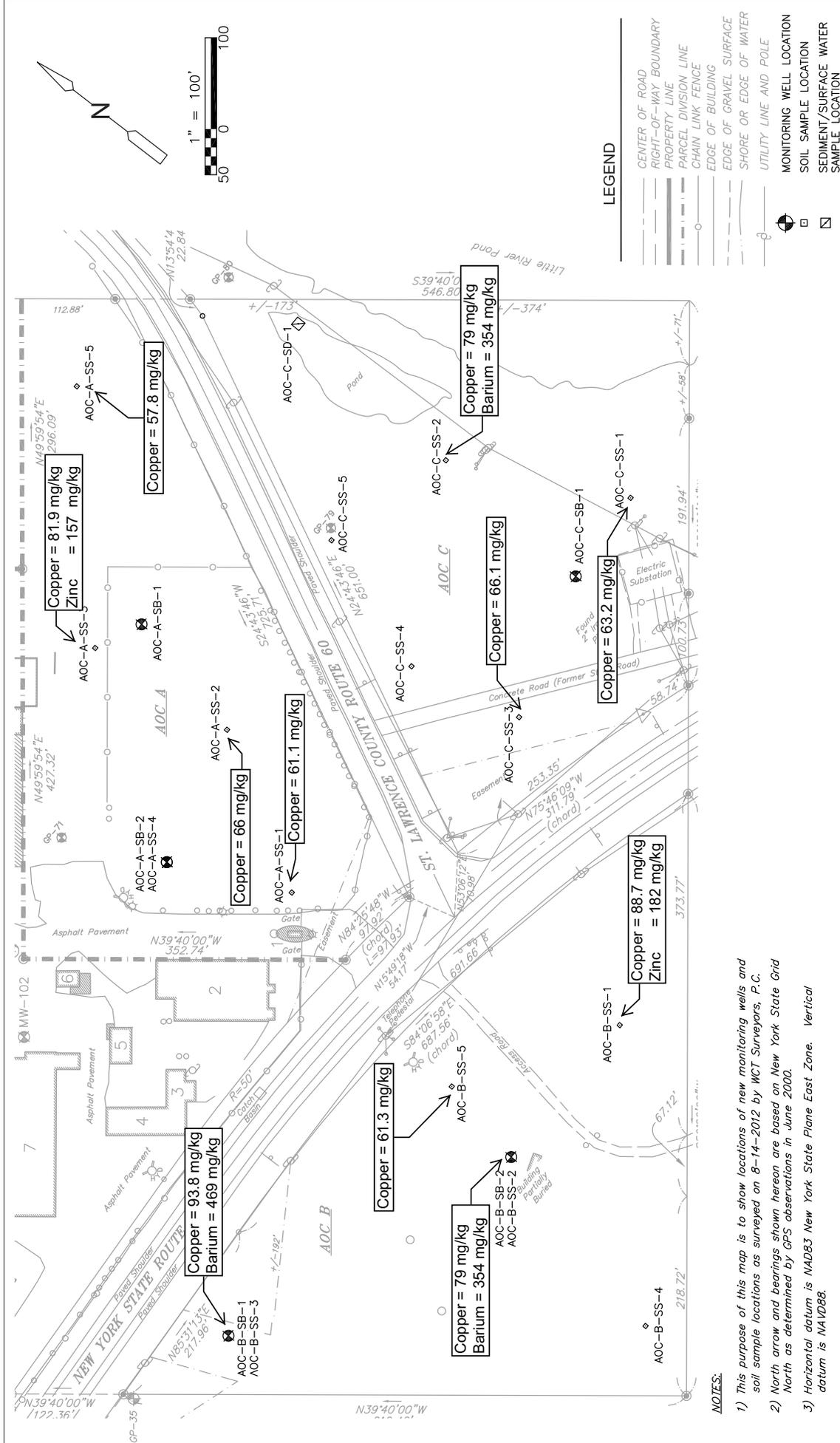
**NOTES:**

- 1) North arrow and bearings shown hereon are based on New York State Grid North as determined by GPS observations in June 2000.
- 2) Horizontal datum is NAD83 New York State Plane East Zone. Vertical datum is NAVD88.

<p><b>CDM Smith</b> Camp Dresser McKee &amp; Smith</p>	<p>New York State Department of Environmental Conservation St. Lawrence County Planning Office Former Jones &amp; Laughlin 18-Acre Site Town of Clifton, New York</p>	<p>DATE: SEPT 2012</p>	<p>SITE PLAN</p>	<p>FIGURE NO. 2</p>
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<p>Camp Dresser McKee &amp; Smith</p>	<p><b>New York State Department of Environmental Conservation</b>  <b>St. Lawrence County Planning Office</b>  <b>Former Jones &amp; Laughlin 18-Acre Site</b>  <b>Town of Clifton, New York</b></p>	<p>DATE: SEPT 2012</p>	<p>GROUNDWATER          AWQS METALS EXCEEDANCES</p>	<p>FIGURE NO. 3</p>
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**NOTES:**

- 1) This purpose of this map is to show locations of new monitoring wells and soil sample locations as surveyed on 8-14-2012 by WCT Surveyors, P.C.
- 2) North arrow and bearings shown hereon are based on New York State Grid North as determined by GPS observations in June 2000.
- 3) Horizontal datum is NAD83 New York State Plane East Zone. Vertical datum is NAVD88.



Camp Dresser McKee & Smith

New York State Department of Environmental Conservation  
 St. Lawrence County Planning Office  
 Former Jones & Laughlin 18-Acre Site  
 Town of Clifton, New York

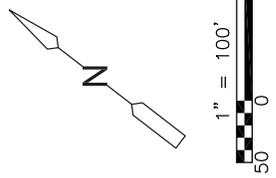
DATE SEPT 2012

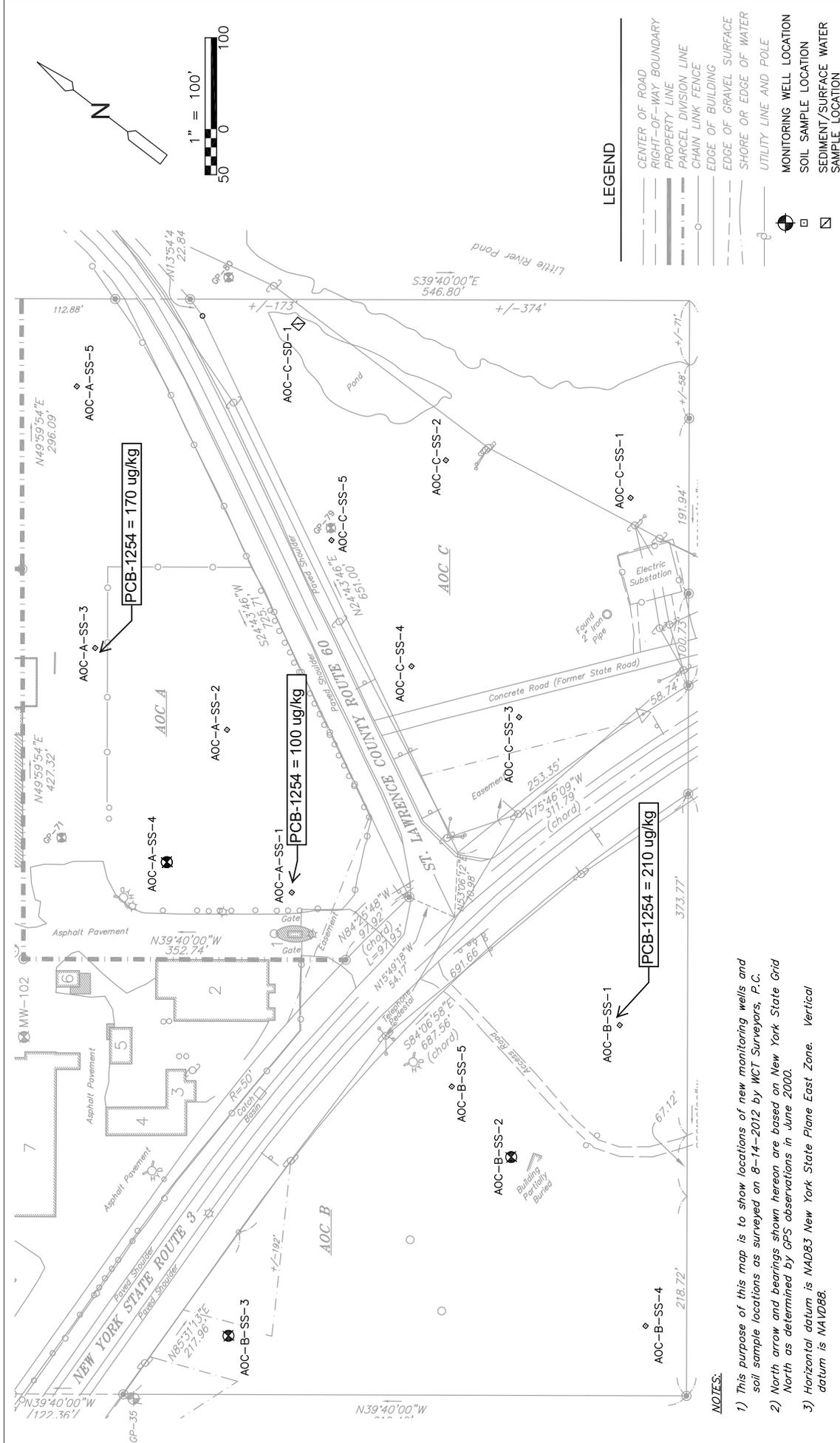
SURFACE SOIL  
 UNRESTRICTED SOIL USE METALS EXCEEDANCES

FIGURE NO. 4

**LEGEND**

- CENTER OF ROAD
- - - RIGHT-OF-WAY BOUNDARY
- - - PROPERTY LINE
- - - PARCEL DIVISION LINE
- - - CHAIN LINK FENCE
- - - EDGE OF BUILDING
- - - EDGE OF GRAVEL SURFACE
- - - SHORE OR EDGE OF WATER
- - - UTILITY LINE AND POLE
- MONITORING WELL LOCATION
- SOIL SAMPLE LOCATION
- SEDIMENT/SURFACE WATER SAMPLE LOCATION





**NOTES:**

- 1) This purpose of this map is to show locations of new monitoring wells and soil sample locations as surveyed on 8-14-2012 by WCT Surveyors, P.C.
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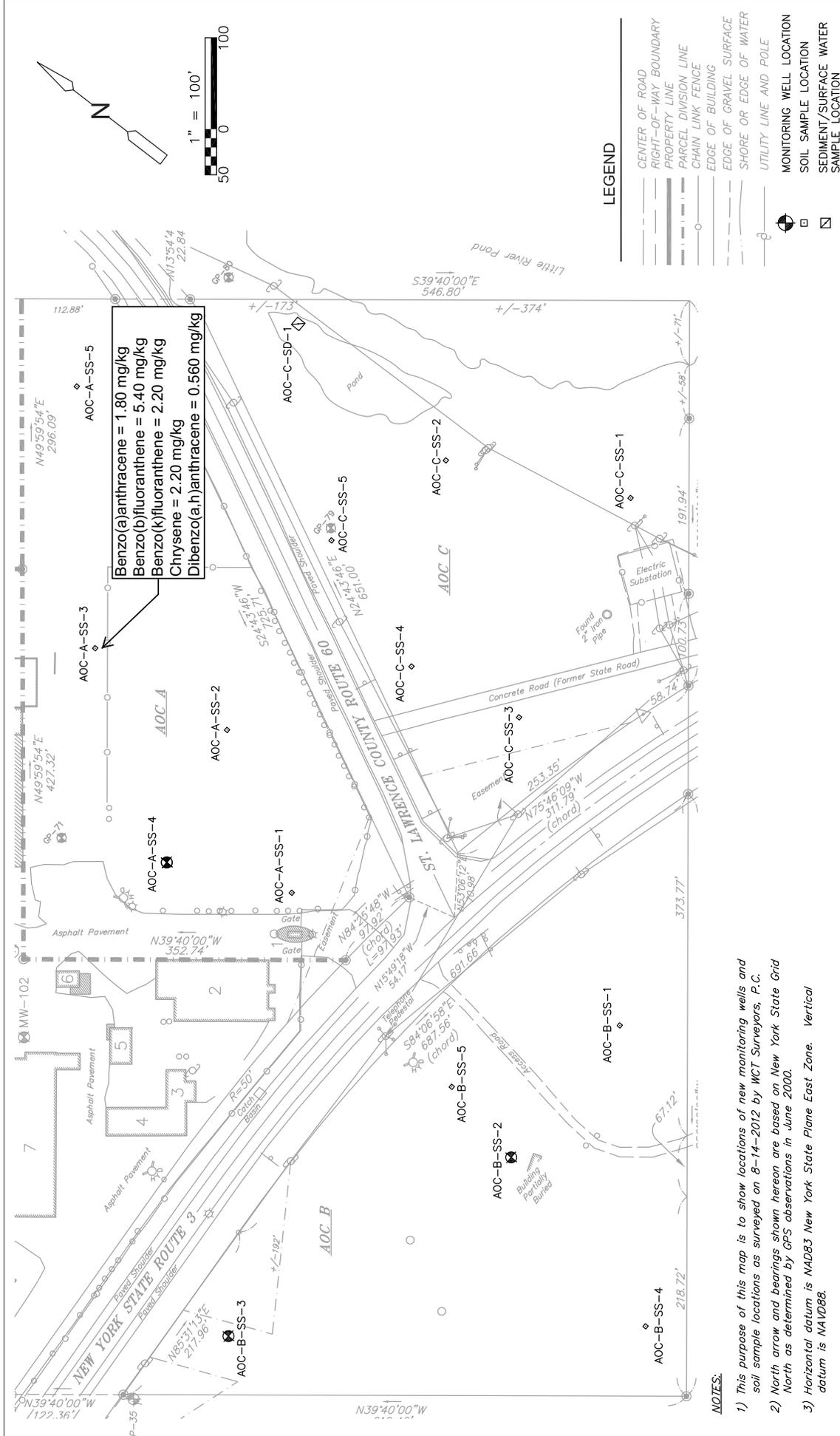
Camp Dresser McKee & Smith

New York State Department of Environmental Conservation  
 St. Lawrence County Planning Office  
 Former Jones & Laughlin 18-Acre Site  
 Town of Clifton, New York

SURFACE SOIL  
 UNRESTRICTED SOIL USE PCB EXCEEDANCES

DATE SEPT 2012

FIGURE NO. 5



**NOTES:**

- 1) This purpose of this map is to show locations of new monitoring wells and soil sample locations as surveyed on 8-14-2012 by WCT Surveyors, P.C.
- 2) North arrow and bearings shown hereon are based on New York State Grid North as determined by GPS observations in June 2000.
- 3) Horizontal datum is NAD83 New York State Plane East Zone. Vertical datum is NAVD88.

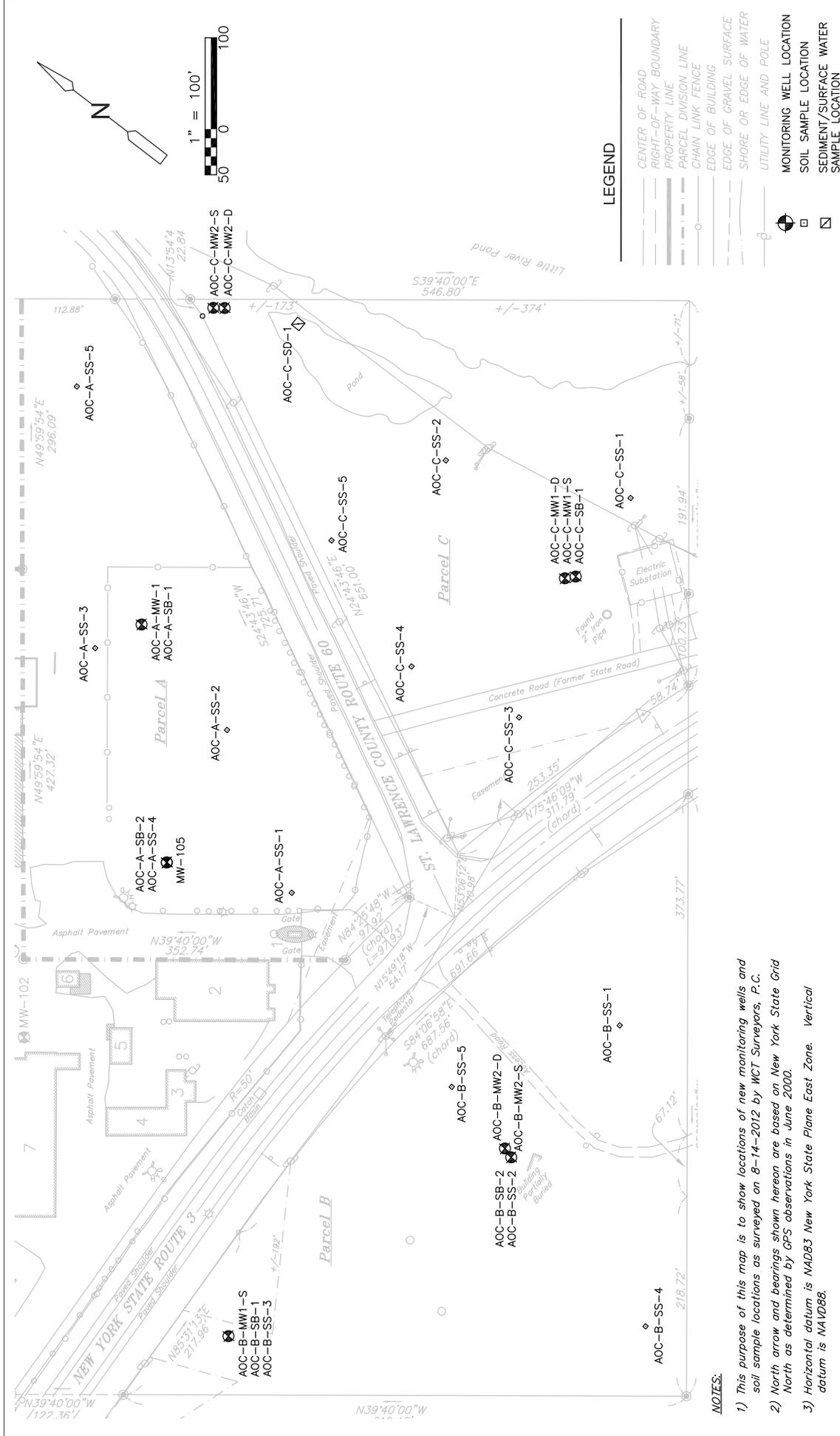
**CDM Smith**  
Camp Dresser McKee & Smith

**New York State Department of Environmental Conservation  
St. Lawrence County Planning Office  
Former Jones & Laughlin 18-Acre Site  
Town of Clifton, New York**

**UNRESTRICTED SOIL USE SVOC EXCEEDANCES**

DATE: SEPT 2012

FIGURE NO. 6



<p><b>LEGEND</b></p> <ul style="list-style-type: none"> <li>— CENTER OF ROAD</li> <li>- - - RIGHT-OF-WAY BOUNDARY</li> <li>— PROPERTY LINE</li> <li>— PARCEL DIVISION LINE</li> <li>- - - CHAIN LINK FENCE</li> <li>— EDGE OF BUILDING</li> <li>— EDGE OF GRAVEL SURFACE</li> <li>— SHORE OR EDGE OF WATER</li> <li>— UTILITY LINE AND POLE</li> <li>⊙ MONITORING WELL LOCATION</li> <li>⊠ SOIL SAMPLE LOCATION</li> <li>⊡ SEDIMENT/SURFACE WATER SAMPLE LOCATION</li> </ul>	<p>FIGURE NO. 7</p>
<p>SAMPLE LOCATION PLAN</p>	<p>DATE SEPT 2012</p>
<p>New York State Department of Environmental Conservation St. Lawrence County Planning Office Former Jones &amp; Laughlin 18-Acre Site Town of Clifton, New York</p>	<p>DATE SEPT 2012</p>
<p><b>CDM Smith</b> Camp Dresser McKee &amp; Smith</p>	<p>DATE SEPT 2012</p>

**NOTES:**

- 1) This purpose of this map is to show locations of new monitoring wells and soil sample locations as surveyed on 8-14-2012 by WCT Surveyors, P.C.
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- 3) Horizontal datum is NAD83 New York State Plane East Zone. Vertical datum is NAVD88.

# **APPENDIX A**

## **Responsiveness Summary**

# RESPONSIVENESS SUMMARY

**Former Jones & Laughlin Ore Processing  
Environmental Restoration Project  
St. Lawrence County, New York  
Site No. E645029**

The Proposed Remedial Action Plan (PRAP) for the Former Jones & Laughlin Ore Processing site was prepared by the New York State Department of Environmental Conservation (the Department) in consultation with the New York State Department of Health (NYSDOH) and was issued to the document repositories on February 13, 2013. The PRAP outlined the remedial measure proposed for the contaminated soil, and groundwater at the Former Jones & Laughlin Ore Processing 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 Jones & Laughlin Ore Processing 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:

Ms. Cora Condrin submitted a letter (dated March 19, 2013) which included the following comments:

**COMMENT 1:** Ms. Condrin expressed her support for the proposed site remedy.

**RESPONSE 1:** The Department acknowledges receipt of the letter.

# **APPENDIX B**

## **Administrative Record**

# **Administrative Record**

**Former Jones & Laughlin Ore Processing  
Environmental Restoration Project  
St. Lawrence County, New York  
Site No. E645029**

1. The Department and St. Lawrence County entered into a State Assistance Contract, Contract No. C302997, dated December 11, 2006.
2. “Site Investigation Work Plan”, dated March 2012, prepared by CDM Smith.
3. “Site Investigation Report”, dated January 2013, prepared by CDM Smith.
4. “Alternatives Analysis”, dated March 2013, prepared by CDM Smith.
5. Proposed Remedial Action Plan for the Former Jones & Laughlin Ore Processing site, dated February 2013, prepared by the Department.
6. Letter dated March 19, 2013 from Ms. Cora Condrin of Splendid Space Bed & Breakfast.

# **Appendix B**

## **Inspection Check List**

**COMPANY NAME**

**OPERATIONS/QUALITY CONTROL**

**SITE COVER INSPECTION REPORT**

**Former Jones & Laughlin Ore Processing Property**

Weather: CONDITIONS      TEMP      °F

Report No.                     

Date:                           Time:                     

**ANNUAL INSPECTION ITEMS**

Inspection Date:    /    /

SYSTEM TO INSPECT	CONDITIONS OBSERVED	PREVIOUS CONDITION
<b>Site Cover</b>	<u>Condition</u> <u>Comment</u>	<u>Condition</u> <u>Comment</u>
Erosion, Vegetation Deterioration, Settling, Ponding, Uplift, Washouts	---	---

Comments:

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