DECISION DOCUMENT

National Plating Company, Inc.
Voluntary Cleanup Program
Syracuse, Onondaga County
Site No. V00264
June 2018

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

DECLARATION STATEMENT - DECISION DOCUMENT

National Plating Company, Inc.
Voluntary Cleanup Program
Syracuse, Onondaga County
Site No. V00264
June 2018

Statement of Purpose and Basis

This document presents the remedy for the National Plating Company, Inc. site, a voluntary cleanup site. The remedial program was chosen in accordance with the New York State Environmental Conservation Law and applicable guidance.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the National Plating Company, Inc. site and the public's input to the proposed remedy presented by the Department.

Description of Selected Remedy

During the course of the investigation certain actions, known as interim remedial measures (IRMs), were undertaken at the above referenced site. An IRM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the remedial investigation (RI) or alternatives analysis (AA). The IRMs undertaken at this site are discussed in Section 6.2.

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

Declaration

The remedy conforms with promulgated standards and criteria that are directly applicable, or that are relevant and appropriate and takes into consideration Department guidance, as appropriate. The remedy is protective of public health and the environment.

6/1/2014
Date

Susan Edwards
Susan Edwards, Director
Remedial Bureau D

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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. The disposal of contaminants at the site resulted in threats to public health and the environment that were addressed by actions known as interim remedial measures (IRMs), which were undertaken at the site. An IRM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the remedial investigation (RI) or alternative analysis (AA). The IRMs undertaken at this site are discussed in Section 6.2. Contaminants include hazardous wastes and/or petroleum.

Based on the implementation of the IRMs, the findings of the investigation of this site indicate that the site no longer poses a threat to human health or the environment. The IRMs conducted at the site attained the remediation objectives identified for this site, which are presented in Section 6.5, for the protection of public health and the environment. No Further Action is the selected remedy. A No Further Action remedy may include continued operation of any remedial system installed during the IRM and the implementation of any prescribed controls that have been identified as being part of the remedy for the site. This DD identifies the IRMs conducted and discusses the basis for No Further Action.

The Voluntary Cleanup Program (VCP) is a voluntary program. The goal of the VCP is to enhance private sector cleanup of brownfields by enabling parties to remediate sites using private rather than public funds and to reduce the development pressures on "greenfields." 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:

NYSDEC Region 7
Attn: Michael Belveg

615 Erie Blvd. West
Syracuse, NY 13204
Phone: 315-426-7551

Receive Site Citizen Participation Information By Email

Please note that the Department's Division of Environmental Remediation (DER) is "going paperless" relative to citizen participation information. The ultimate goal is to distribute citizen participation information about contaminated sites electronically by way of county email listservs. Information will be distributed for all sites that are being investigated and cleaned up in a particular county under the State Superfund Program, Environmental Restoration Program, Brownfield Cleanup Program, Voluntary Cleanup Program, and Resource Conservation and Recovery Act Program. We encourage the public to sign up for one or more county listservs at http://www.dec.ny.gov/chemical/61092.html

SECTION 3: SITE DESCRIPTION AND HISTORY

Location: The former National Plating Company, Inc. (National Plating) site is located at 1501 Brewerton Road in the town of Salina, Onondaga County, New York. The property is approximately one acre in size. The site is bordered to the north by a light industrial business, to the south and west by the former town of Salina Landfill, and to the east by Brewerton Road and residences. Ley Creek is located south of the former Town of Salina Landfill.

Site Features: The site is relatively flat and contains a 3,600 square-foot manufacturing building and a 700 square-foot foot garage. The buildings are surrounded by paved areas for vehicle traffic and parking. A grass area is located at the rear of the property.

Current Zoning and Land Use: From 2009 to present, J E Miller Inc. has occupied the site. The site is currently active, zoned for industrial use, and used for light industrial metal machining. The surrounding parcels are currently used for a combination of light industrial, and utility rights-of-way. The nearest residential area is across from the site immediately east of Brewerton Road.

Past Use of the Site: From the early 1950s to 2002, the site was reportedly used for industrial purposes as a metal plating facility specializing in decorative and industrial metal finishing, including electroplating, electrolysis plating, buffing, and polishing of various metals. From 2003 through 2004, the site was shut down for repairs. From 2005 through 2008, Solvents and Petroleum Services used the site for storage. Historical operations or possible spills of hazardous waste at the site could have impacted on-site soils.

In 1987, surface soil samples were collected as part of an environmental compliance audit and the samples indicated elevated concentrations of cyanide, chromium, nickel, cadmium, and zinc in the surface soils, especially off the western and northern edges of the pavement behind the building.

In August of 1997, a Site Summary Report for the property was prepared as part of a broader

investigation of the Onondaga Lake drainage basin. The report concluded that contamination of soil and groundwater near National Plating was likely associated with the adjacent town of Salina Landfill. The report also stated that limited soil data collected from the edges of the National Plating property (apparently the previously discussed 1987 data) may have been caused from onsite operations.

The business was sold in 1999 and operations were discontinued in 2002. A Phase I Environmental Site Assessment (ESA) was completed on the site in May 1999. The Phase I ESA recommended a Phase II investigation be performed. It is unknown if any further investigation was conducted at that time.

Site Geology and Hydrogeology: The site is in a glacial terrain, characterized by a flat-lying plain consisting of lacustrine fine sand and silt deposits. The bedrock beneath the site is the Silurian Vernon Shale, which exhibits low permeability but possesses secondary porosity due to fractures.

Groundwater is approximately 6-10 feet below grade and generally flows in a south-southwesterly direction towards Ley Creek.

A site boundary map is attached as Figure 1. A map showing the site location is attached as Figure 1-1.

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, at a minimum, alternatives (or an alternative) that restrict(s) the use of the site to commercial use (which allows for industrial use) as described in DER-10, Technical Guidance for Site Investigation and Remediation were/was evaluated.

A comparison of the results of the investigation to the appropriate standards, criteria and guidance values (SCGs) for the identified land use and the unrestricted use SCGs for the site contaminants is available in the Remedial Investigation (RI) Report.

SECTION 5: ENFORCEMENT STATUS

The Department entered a Voluntary Cleanup Agreement with D.J.H. Realty Corporation and BMH Liquidation, Inc. for the National Plating Company, Inc. site on March 22, 2004 (Index No. A7-0493-0903). The agreement governs the submission and implementation of work plans for the site investigation, remediation and operation, maintenance and monitoring.

SECTION 6: SITE CONTAMINATION

6.1: Summary of the Remedial Investigation

A remedial investigation (RI) serves as the mechanism for collecting data to:

- characterize site conditions;
- determine the nature of the contamination; and
- assess risk to human health and the environment.

The RI is intended to identify the nature (or type) of contamination which may be present at a site and the extent of that contamination in the environment on the site, or leaving the site. The RI reports on data gathered to determine if the soil, groundwater, soil vapor, indoor air, surface water or sediments may have been contaminated. Monitoring wells are installed to assess groundwater and soil borings or test pits are installed to sample soil and/or waste(s) identified. If other natural resources are present, such as surface water bodies or wetlands, the water and sediment may be sampled as well. Based on the presence of contaminants in soil and groundwater, soil vapor will also be sampled for the presence of contamination. Data collected in the RI influence the development of remedial alternatives. The RI report is available for review in the site document repository and the results are summarized in section 6.3.

The analytical data collected on this site includes data for:

- air
- groundwater
- soil
- soil vapor
- indoor air
- sub-slab vapor

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. 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 below. Additionally, the RI Report contains a full discussion of the data. The contaminants of concern identified at this site are:

cyanides (soluble cyanide salts)
chromium
cadmium
nickel
zinc
trichloroethene (TCE)
cis-1,2-dichloroethene

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

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 Decision Document.

The following IRMs have been completed at this site based on conditions observed during the RI.

IRM Soil Excavation

In November of 2011, an excavation program was undertaken to remove contaminant source areas. Soil which exceeded the protection of groundwater soil cleanup objectives (PGWSCOs) was excavated and disposed off-site at a permitted facility. The excavation took place under the building at the former sump area. The excavation went to a depth of 9 feet bgs and was limited by structural columns and heavy machinery.

Approximately 25 tons of contaminated soil was removed from the site. Soil sampling at the limits of the excavation indicated remaining soil met Industrial SCOs, but TCE was above the PGWSCO in the bottom sample, at approximately 9 feet bgs. Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) was brought in to replace the excavated soil and establish the designed grades at the site.

Groundwater Treatment Pilot Test

In-situ chemical oxidation was implemented to treat VOCs in the groundwater. In both April and May of 2015, sodium permanganate was injected into the subsurface to destroy the contaminants in the former sump area. Injections were accomplished via a perforated pipe installed during the remediation of the former sump area. Since the injections, the site has seen a decrease in total VOCs in the groundwater.

IRM Soil Vapor Mitigation

Soil Vapor Intrusion investigations were conducted in the main on-site building and VOCs were detected in the indoor air above air guidelines. Based on both the sub-slab-vapor and indoor air results, mitigation was recommended. Therefore, a sub-slab depressurization system (SSDS) was installed in the main on-site manufacturing building to prevent the vapors beneath the slab from

entering the building. The SSDS was installed in August 2017. Post mitigation pressure field tests and indoor air sampling were conducted to confirm that the SSDS was operating as intended and effective. The operation and maintenance of this SSDS will continue until the Department and NYSDOH determine that the system is no longer necessary to achieve the remedial action objectives.

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. The RI report presents a detailed discussion of any existing and potential impacts from the site to fish and wildlife receptors.

Prior to remediation, the primary contaminants of concern were metals and chlorinated solvents in soils and groundwater, and VOCs in soil vapor.

Offsite soil and groundwater contamination to the west was investigated and mitigated as part of the adjacent town of Salina Landfill inactive hazardous waste site remedial work. To the north, an offer was extended to the owner of the neighboring building to determine whether actions are needed to address exposures related to soil vapor intrusion. Access was not granted to the site.

Soil

As part of the town of Salina Landfill remedial work, onsite soil behind the Former National Plating building was dug out and replaced. Sampling in 2012 showed that the top two feet of soil is clean as there was no detections of any contaminates. Soil confirmation sampling under the main building, one from the bottom and one from the south sidewall, indicated no Semi Volatile Organic Compounds (SVOCs), pesticides or PCBs were detected at concentrations greater than Commercial or Industrial Use SCOs. VOCs were detected during confirmation sampling. TCE was detected at a concentration of 198 mg/kg in the excavation bottom sample, which is close to the Commercial Use SCO of 200 mg/kg, but well below the Industrial Use SCO of 400 mg/kg. Concentrations of metals were less than Industrial Use SCOs, but cadmium was reported at a concentration of 27 mg/kg in the excavation sidewall sample, which exceeds the Commercial Use SCO of 9.3 mg/kg.

Soil Vapor

Prior to the SSDS installation, VOCs were sampled for in sub-slab and indoor air tests. Sixteen VOCs compounds were detected in the indoor air sample from the onsite building. The highest compound concentration detected was TCE at 650 mcg/m3. Sub-slab sample results detected 24 VOCs compounds. TCE was detected at 597 mcg/m3. Mitigation of the main building was required based on the TCE results and the DOH Soil Vapor/Indoor Air Matrix A. Results of the post-mitigation pressure field extension testing and confirmation sampling for sub-slab vapor and indoor air will be recorded in the Final Engineering Report. The onsite garage was not sampled for SVI as it is unoccupied and only used for storage.

Sampling indicated the potential for off-site soil vapor intrusion concerns and soil vapor intrusion sampling was offered to the owner of one building to the north. The property owner has not agreed to the sampling. The potential off-site impact is limited to this one off-site building however, there are future potential soil vapor intrusion concerns for any future development in this off-site area.

Groundwater

Pesticides, PCBs, and SVOCs were not present in samples above the groundwater Standards, Criteria, and Guidance (SCGs) levels. Five metals were detected above groundwater SCGs including Cadmium and Chromium. Metals exceeded SCGs in MW-2 and MW-4 in 2012. VOCs including, TCE and cis-1,2-dichloroethene, were detected above groundwater SCGs levels in MW-4 in 2015. This well has not been sampled since 2015 due to residual permanganate present. These contaminants were also detected in MW-6 in July of 2016 slightly above standards. This well is next to the building close to the source.

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.*

People are not drinking the contaminated groundwater because the area is served by a public water supply that is not affected by this contamination. Since the site is covered by buildings, pavement, and at least one foot of clean soil, people will not come into contact with site related soil and groundwater contamination unless they dig below the surface. Volatile organic compounds in soil vapor (air spaces within the soil), may move into buildings and affect the indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. A sub-slab depressurization system (system that ventilates or removes the air beneath the building) has been installed in the only occupied on-site building to prevent the indoor air quality from being affected by the contamination in the soil vapor beneath the building. The potential exists for the inhalation of site contaminants due to soil vapor intrusion if remaining buildings are redeveloped or if new buildings are developed on the site. Sampling indicates soil vapor intrusion is a potential concern for one off-site building and soil vapor intrusion sampling was offered to the owner of the building. The building owner has not agreed to the sampling. The potential off-site soil vapor intrusion concerns are limited to this one building, however there are future potential soil vapor intrusion concerns for any new buildings built in this off-site area.

6.5: Summary of the Remediation Objectives

The objectives for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375. The goal for the remedial program is to restore the site to pre-disposal conditions to the extent feasible. At a minimum, the remedy shall eliminate or mitigate all significant threats to public health and the environment presented by the

contamination identified at the site through the proper application of scientific and engineering principles.

The remedial action objectives for this site are:

Groundwater

RAOs for Public Health Protection

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

RAOs for Environmental Protection

- Restore ground water aquifer to pre-disposal/pre-release conditions, to the extent practicable.
- Remove the source of ground or surface water contamination.

Soil

RAOs for Public Health Protection

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

RAOs for Environmental Protection

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

Soil Vapor

RAOs for Public Health Protection

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

SECTION 7: ELEMENTS OF THE SELECTED REMEDY

Based on the results of the investigations at the site, the IRMs that have been performed, and the evaluation presented here, the Department is proposing No Further Action as the remedy for the site. This No Further Action remedy includes the continued operation of the SSDS, and the implementation of institutional controls, in the form of an environmental easement and a site management plan. The Department believes that this remedy is protective of human health and the environment and satisfies the remediation objectives described in Section 6.5.

The operation of the components of the remedy, as may be necessary, will continue until the remedial objectives have been achieved, or until the Department determines that continued operation is technically impracticable or not feasible.

The elements of the IRMs already completed are detailed in section 6.2 and the institutional and engineering controls required in support of this remedy are as follows:

1. Institutional Controls

Imposition of an institutional control in the form of an Environmental Easement for the controlled property that:

• Requires the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375- 1.8 (h)(3);
• Allows the use and development of the controlled property for industrial uses as defined by Part 375-1.8(g), although land 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.

2. Site Management Plan

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

a. An Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective:

Institutional Controls: The Environmental Easement discussed in remedial element 1 above.

This plan includes, but may not be limited to:

• An Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
• A provision for further investigation and remediation should large scale redevelopment occur, if any of the existing structures are demolished, or if the subsurface is otherwise made accessible. The nature and extent of contamination in areas where access was previously limited or unavailable will be immediately and thoroughly investigated pursuant to a plan approved by the Department. Based on the investigation results and the Department determination of the need for a remedy, a Remedial Action Work Plan (RAWP) will be developed for any additional remedial action, including removal and/or treatment of any source areas to the extent feasible. Citizen Participation Plan (CPP) activities will continue through this process. Any necessary remediation will be completed prior to, or in association with, redevelopment;
• A provision for removal or treatment of the source area located under the main building if the building is demolished or becomes vacant;
• A provision for evaluation of the potential for soil vapor intrusion if the existing garage building is redeveloped/occupied or if new buildings are developed on the site or in off-site areas where sampling results indicate a need (including those

that have previously declined testing), including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
• Provisions for the management and inspection of the identified engineering controls;
• Maintaining site access controls and Department notification; and
• The steps necessary for the periodic reviews and certification of the institutional and engineering controls.

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

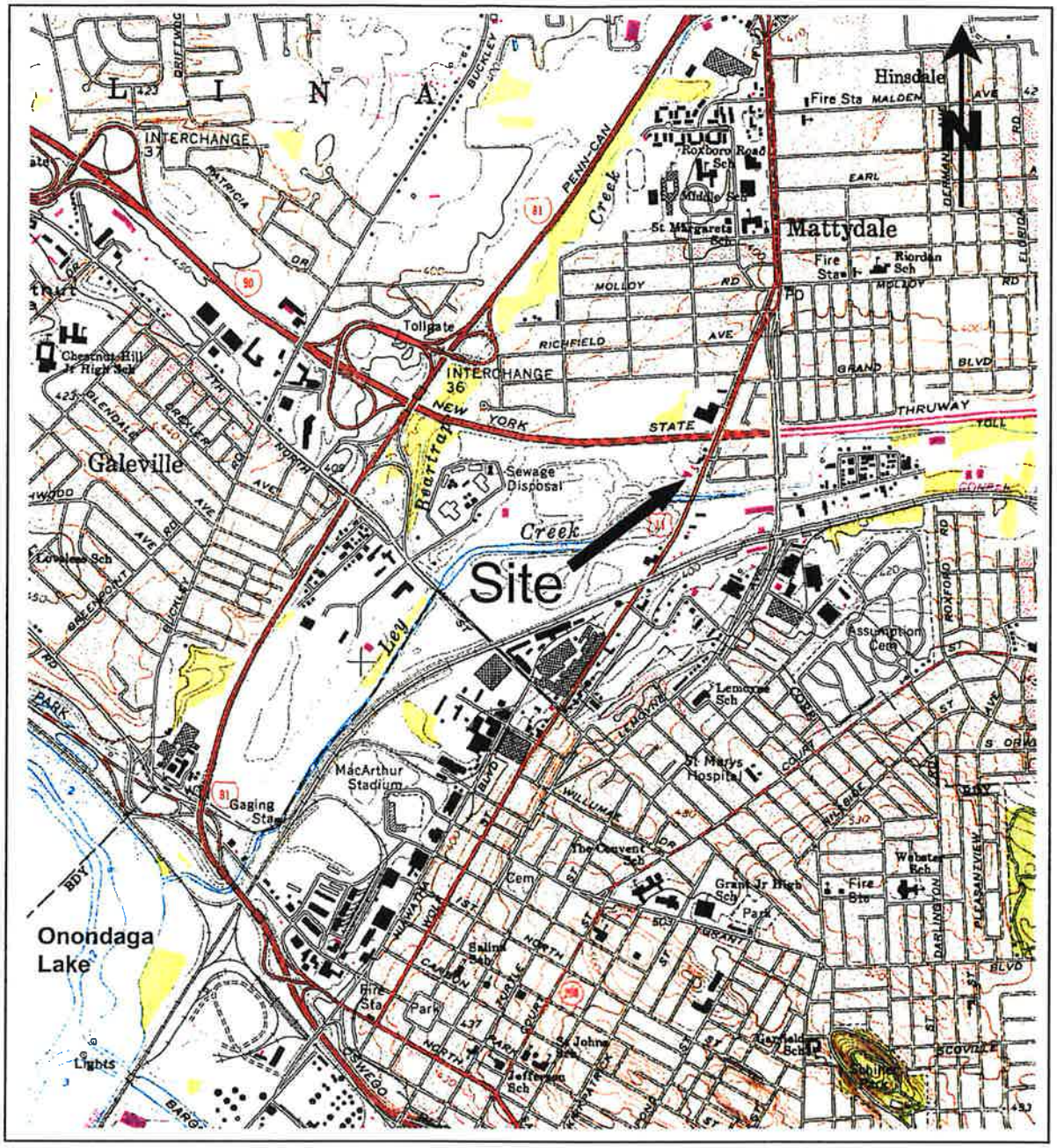
• Monitoring of groundwater to assess the performance and effectiveness of the remedy;
• A schedule of monitoring and frequency of submittals to the Department; and
• Monitoring for soil vapor intrusion for any buildings, as may be required by Institutional and Engineering Control Plan discussed in item 2a above.

c. An Operation and Maintenance (O&M) Plan to ensure continued operation, maintenance, optimization, monitoring, inspection, and reporting of any mechanical or physical components of the remedy. The plan includes, but is not limited to:

• Procedures for operating and maintaining the remedy;
• Compliance monitoring of treatment systems to ensure proper O&M as well as providing the data for any necessary permit or permit equivalent reporting;
• Maintaining site access controls and Department notification; and
• Providing the Department access to the site and O&M records.

3. Green remediation principals and techniques will be implemented to the extent feasible in the site management of the remedy as per DER-31. The major green remediation components are as follows:

• Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
• Reducing direct and indirect greenhouse gas and other emissions;
• Increasing energy efficiency and minimizing use of non-renewable energy;
• Conserving and efficiently managing resources and materials; and
• Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste.



SCALE
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0 1000 2000 3000 4000 5000 FEET

0 .5 1.0 KILOMETERS

0 .5 1.0 MILES

MAP REFERENCE
United States Geological Survey
7.5 minute Series Topographic Map
Quadrangle: Syracuse, NY
Date: 1994 (check)

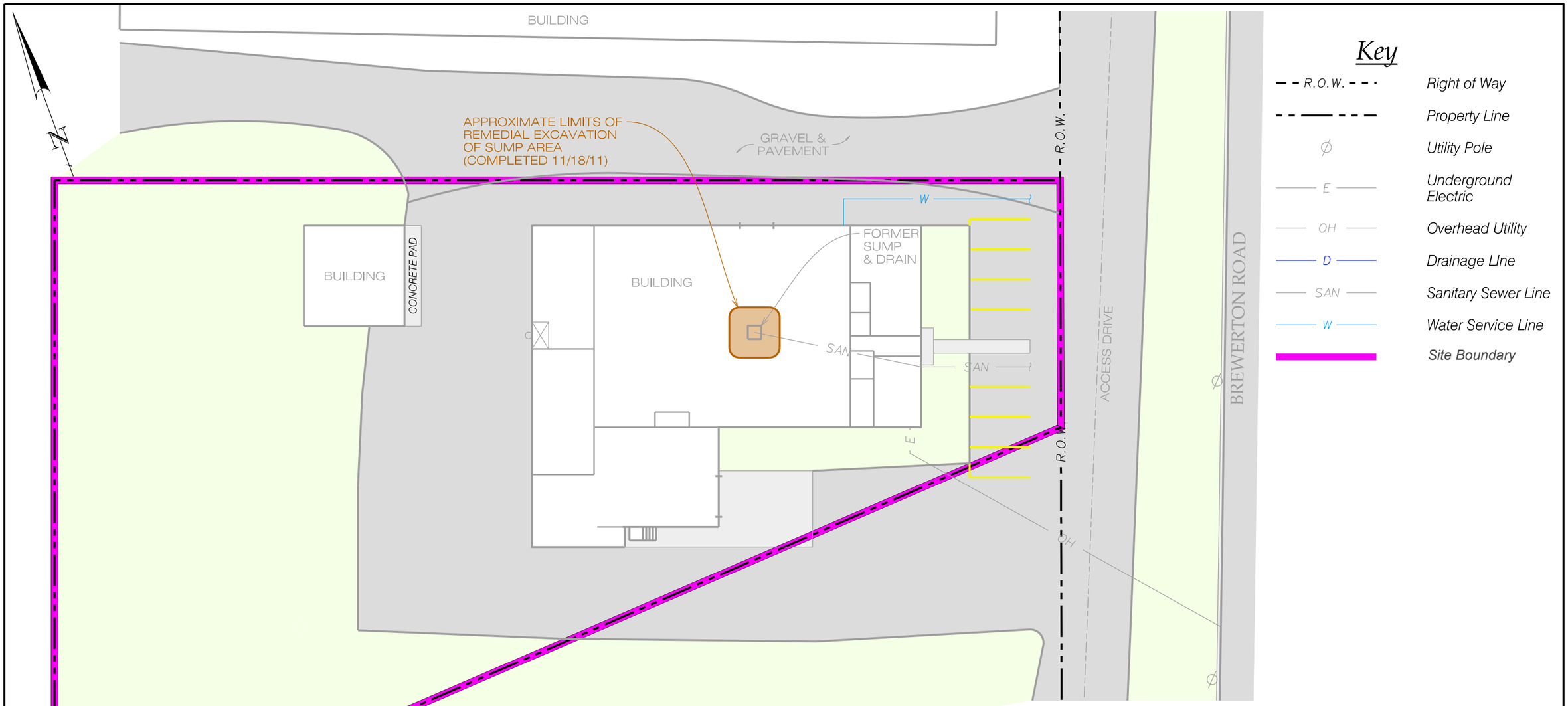
ENSR INTERNATIONAL
6601 KIRKVILLE ROAD
EAST SYRACUSE, NEW YORK 13057-9672
PHONE: (315) 432-0506
FAX: (315) 437-0509
WEB: HTTP://WWW.ENSR.COM

SITE LOCATION

FORMER NATIONAL PLATING FACILITY
SYRACUSE, NEW YORK

FIGURE NUMBER: 1-1

DRAWN BY:	DATE:	PROJECT NUMBER:
KAG	8/25/03	10160-003



Plan View

1" = 30' SCALE (15 0 15 30 FEET)

DEC SITE: VCP00265-7

Basemap References:

1. *"National Plating, Inc., 1501 Brewerton Road, Syracuse, New York, Site Layout" Dated: May 20, 1999.*

PLUMLEY ENGINEERING

PLUMLEY ENGINEERING, P.C.
8232 LOOP ROAD
BALDWINSVILLE, NY 13027

TELEPHONE: (315) 638-8587
FAX: (315) 638-9740
WWW.PLUMLEYENG.COM

Civil and Environmental Engineering

REVISIONS: DATE: BY:

PROJECT: FORMER NATIONAL PLATING

DWG. TITLE: SITE PLAN

CLIENT: DJH REALTY CORP.

LOCATION: TOWN OF SALINA, ONONDAGA COUNTY, NEW YORK

PROJECT No.:	2010150
FILE NAME.:	FIGURE 1
SCALE:	AS NOTED
DATE:	NOV. 2017
ENG'D BY:	DKM
DRAWN BY:	JJL
CHECKED BY:	DRV

SHEET NO.: FIGURE 1