
Division of Environmental Remediation

**Environmental Restoration
Record of Decision
Plattsburgh Gateway Project/
Durkee Street Site
City of Plattsburgh,
Clinton County, New York
Site Number E510020**

March 2007

DECLARATION STATEMENT
ENVIRONMENTAL RESTORATION RECORD OF DECISION

Plattsburgh Gateway Project/Durkee Street
Environmental Restoration Site
City of Plattsburgh, Clinton County, New York
Site No. E510020

Statement of Purpose and Basis

The Record of Decision (ROD) presents the selected remedy for the Plattsburgh Gateway Project/Durkee Street site, an environmental restoration site. The selected remedial program was chosen in accordance with the New York State Environmental Conservation Law and is consistent with the National Oil and Hazardous Substances Pollution Contingency Plan of March 8, 1990 (40CFR300), as amended.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the Plattsburgh Gateway Project/Durkee Street environmental restoration site, and the public's input to the Proposed Remedial Action Plan (PRAP) presented by the Department. A listing of the documents, as a part of the Administrative Record, is included in Appendix B of the ROD.

Assessment of the Site

Actual or threatened release of hazardous substances and petroleum products from this site have been addressed by implementing the interim remedial measures identified in this ROD. The removal of contaminated soil from the site has significantly reduced the threat to public health and the environment. Therefore, a groundwater monitoring program will be implemented to monitor the effectiveness of previous remedial actions in preventing further contamination of the groundwater.

Description of Selected Remedy

Based on the results of the Remedial Investigation/Remedial Alternatives Report (RI/RAR) for the Plattsburgh Gateway Project/Durkee Street site and the criteria identified for evaluation of alternatives, the Department has selected No Further Action with institutional controls in the form of an environmental easement limiting use of the site to restricted residential activity in conformance with local zoning, including the continued use as a parking lot. The components of the remedy are as follows:

1. Imposition of an institutional control in the form of an environmental easement that will require: (a) limiting the use and development of the property to restricted residential use, which will also permit commercial use in conformance with local zoning; (b) compliance

with the approved site management plan; (c) restricting the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by NYSDOH; and (d) submission by the property owner to the Department a periodic certification of institutional and engineering controls.

2. Development of a site management plan which will include the following institutional and engineering controls: (a) notice to the Department of any ground intrusive work or change in use, management of the final cover system to restrict excavation below the pavement layer, or buildings. Excavated soil would be tested, properly handled to protect the health and safety of workers and the nearby community, and would be properly managed in a manner acceptable to the Department; (b) evaluation of the potential for vapor intrusion for any buildings developed on the site, including provision for mitigation of any impacts identified; (c) monitoring of groundwater; and (d) provisions for the operation, maintenance, and monitoring of the of the installed sub-slab vapor mitigation system in the office building presently under construction.
3. The property owner would provide a periodic certification of institutional and engineering controls, prepared and submitted by a professional engineer or such other expert acceptable to the Department, until the Department notifies the property owner in writing that this certification is no longer needed. This submittal would: (a) contain certification that the institutional controls and engineering controls put in place are still in place and are either unchanged from the previous certification or are compliant with Department-approved modifications; (b) allow the Department access to the site; and (c) state that nothing has occurred that would impair the ability of the control to protect public health or the environment, or constitute a violation or failure to comply with the site management plan unless otherwise approved by the Department.

New York State Department of Health Acceptance

The New York State Department of Health (NYSDOH) concurs that the remedy selected 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.

Date

Dale A. Desnoyers, Director
Division of Environmental Remediation

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Environmental Restoration RECORD OF DECISION

**Plattsburgh Gateway Project/Durkee Street Site
City of Plattsburgh, Clinton County, New York
Site No. E510020
March 2007**

SECTION 1: SUMMARY OF THE RECORD OF DECISION

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), has selected this remedy for the Plattsburgh Gateway Project/Durkee Street site.

The 1996 Clean Water/Clean Air Bond Act provides funding to municipalities for the investigation and cleanup of brownfields. 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.

As more fully described in Sections 3 and 5 of this document, former commercial and manufacturing activities such as automotive repair, steam laundering, and milling resulted in the disposal of hazardous substances, including volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and metals. These hazardous substances contaminated the subsurface soils and groundwater at the site, and resulted in:

- a threat to human health associated with potential exposure to contaminated subsurface soils and groundwater.

During the course of the investigation certain actions, known as interim remedial measures (IRMs), were undertaken at the Plattsburgh Gateway Project/Durkee Street site in response to the threats identified above. 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/remedial alternatives report (RI/RAR). The IRM undertaken at this site included an extensive source soil excavation and underground storage tank removal.

Based on the implementation of the above IRM, 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 with institutional controls in the form of an environmental easement limiting use of the site to restricted residential activity in conformance with local zoning, including the continued use as a parking lot, was selected as the remedy for this site.

The selected remedy, discussed in detail in Section 6, is intended to attain the remediation goals identified for this site in Section 6. The remedy must conform with officially 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.

SECTION 2: SITE LOCATION AND DESCRIPTION

The Plattsburgh Gateway Project/Durkee Street site is approximately a 5.1-acre lot on the eastern side of Durkee Street in the City of Plattsburgh, Clinton County, New York. The site lies in an urban area in downtown Plattsburgh, adjacent to the Saranac River as indicated in Figure 1. Lake Champlain lies approximately ½ mile to the east of the site.

The site's geology consists primarily of urban fill to approximately 8 feet deep, followed by glacial till to approximately 18 feet below ground surface (bgs). The fill consisted of various amounts of sand, gravel, silt, brick, ash, wood, cinder and concrete. During onsite drilling activities, auger refusal was encountered at approximately 18 ft bgs, which based on information obtained from another nearby remedial project, this is indicative of the presence of bedrock. The site's hydrogeology consisted of groundwater perched atop the glacial till layer, at approximately 8 ft bgs. Overall groundwater flow is from west to east toward the Saranac River. Surface water drains into the Saranac River then flows northerly into Lake Champlain, entering into the lake approximately ½ mile to the northeast of the site.

SECTION 3: SITE HISTORY

3.1: Operational/Disposal History

The site has been occupied since the late 1800s with primarily tenement residences and auto repair until 1927. After 1927, manufacturing became more prominent with rug cleaning, dry cleaning, sign painting, and milling activities associated with the site. In addition, over the years, several petroleum spills were reported and properly closed under the oil spill program. These former manufacturing activities and spill events may have resulted in the disposal of hazardous substances on site. The City slowly acquired the deeds for the Durkee Street lots from approximately 1964 through 1991. The buildings were demolished over that time period. The current municipal public parking lot was established in the early 1980s.

3.2: Remedial History

A Limited Subsurface Investigation was performed in May 2004 on behalf of the City of Plattsburgh. This investigation detected metals, VOC, and SVOC soil contamination in the subsurface. In October 2004, an Environmental Database Report was also conducted on behalf of the City. The RI was conducted between July 2004 and December 2006.

SECTION 4: ENFORCEMENT STATUS

Potentially Responsible Parties (PRPs) are those who may be legally liable for contamination at a site. This may include past owners and operators, waste generators, and haulers. Since no viable PRPs have been identified, there are currently no ongoing enforcement actions. However, legal action may be initiated at a future date by the state to recover state response costs should

PRPs be identified. The City of Plattsburgh will assist the state in its efforts by providing all information to the state which identifies PRPs. The City will also not enter into any agreement regarding response costs without the approval of the Department.

SECTION 5: SITE CONTAMINATION

The City of Plattsburgh has recently completed remedial investigation/remedial alternatives reports (RI/RARs) to determine the nature and extent of any contamination by hazardous substances at this environmental restoration site.

5.1: Summary of the Remedial Investigation

The purpose of the RI was to define the nature and extent of any contamination resulting from previous activities at the site. The RI was conducted between July 2004 and December 2006. The field activities and findings of the investigation are described in the RI reports.

Investigative tasks performed as part of the RI include surface soil sampling and analysis, soil boring and monitoring well installation, subsurface soil sampling and analysis, groundwater sampling and analysis, and the performance of a soil gas survey.

5.1.1: Standards, Criteria, and Guidance (SCGs)

To determine whether the soil, groundwater, and soil gas contain contamination at levels of concern, data from the investigation were compared to the following SCGs:

- Groundwater, drinking water, and surface water SCGs are based on the Department's "Ambient Water Quality Standards and Guidance Values" and Part 5 of the New York State Sanitary Code.
- Soil SCGs are based on the Department's Cleanup Objectives ("Technical and Administrative Guidance Memorandum [TAGM] 4046; Determination of Soil Cleanup Objectives and Cleanup Levels," and 6 NYCRR Subpart 375-6 - Remedial Program Soil Cleanup Objectives").
- Concentrations of VOCs in air were evaluated using the air guidelines provided in the NYSDOH guidance document titled "Guidance for Evaluating Soil Vapor Intrusion in the State of New York."

Based on the RI results, in comparison to the SCGs and potential public health and environmental exposure routes, certain media and areas of the site required remediation. These are summarized in Section 5.1.2. More complete information can be found in the RI reports.

5.1.2: Nature and Extent of Contamination

This section describes the findings of the investigation for all environmental media that were investigated.

As described in the RI reports, many soil, groundwater and soil vapor samples were collected to characterize the nature and extent of contamination. As seen in Figures 2 through 7 and summarized in Tables 1 through 3, the main categories of contaminants that exceed their SCGs were volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and inorganics (metals). For comparison purposes, where applicable, SCGs were provided for each medium.

Chemical concentrations are reported in parts per billion (ppb) for water, and parts per million (ppm) for soil. Air samples are reported in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).

Figures 2 through 7 and Tables 1 through 3 summarize the degree of contamination for the contaminants of concern in soil, and groundwater, and compare the data with the SCGs for the site. The following are the media which were investigated and a summary of the findings of the investigation.

Surface Soil

The Plattsburgh Gateway Project/Durkee Street site comprises of a large municipal parking lot with a farmer's market pavilion and a future office building with adjacent parking garage. Because the entire site is either completely paved or covered with concrete, there was no surface soil sampling conducted at the site.

Subsurface Soil

During the Remedial Investigation, both subsurface soil samples and near surface soil samples immediately below the pavement were taken. The following discussion summarizes the analytical results for these samples.

Six SVOCs were detected above their respective SCGs, as indicated on Table 1. These SVOCs include benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, and dibenzo(a,h)anthracene. All of the SVOC contaminants are considered carcinogenic polycyclic aromatic hydrocarbons (cPAHs). These cPAHs were all detected in the historic fill material at approximately 8 to 10 foot depth and potentially associated with the ash and cinder components of the fill material. The SVOC contamination is depicted in Figures 3 and 5, with the highest exceedance being benzo(a)pyrene at 14 ppm at MW-14 at the 8 to 10 foot depth.

Four metals were detected above their respective SCGs as indicated on Table 1. Of the four detected, calcium; and magnesium were the only contaminants found to be above their respective Eastern USA Background concentration. As indicated in Figures 4 and 6, the metals contamination appeared to be spread randomly throughout the site at varying depths, with the greatest exceedance being calcium at 117,000 ppm at MW-11 at the 0.5 to 2 foot depth. In general, the subsurface soil contaminants of concern are SVOCs, mainly cPAHs, and metals. Pesticides, PCBs, and VOCs were not detected in any of the soil samples collected. Subsurface soil contamination identified during the RI/RAR was partially addressed during the IRM soil excavation and underground storage tank (UST) removal as described in Section 5.2.

Groundwater

Five metals were detected at concentrations above SCGs in the site groundwater. These detections included iron, lead, magnesium, manganese, and sodium as indicated in Table 3. These detections are attributed to the elevated turbidity levels measured during the groundwater sampling event. The historic fill material may have contributed to the elevated turbidity levels.

Only one SVOC, bis(2-Ethylhexyl)phthalate, was detected slightly above its SCG in 8 of the 12 monitoring wells onsite with the highest exceedance detected at 9.7 ppb in MW-4. Bis(2-Ethylhexyl)phthalate is a common laboratory contaminant, and was also detected in the equipment blank during this sampling event. However, the data usability summary report (DUSR) did not identify the compound as a laboratory contaminant.

Six VOCs were detected in the onsite monitoring wells above SCGs. Five of these chlorinated VOCs or CVOCs were detected in monitoring wells MW-9, MW-10, MW-23, MW-25, and MW-26 as indicated in Figure 7. The five CVOCs were all detected at their highest concentration at MW-10 at the following concentrations: vinyl chloride at 170 ppb; 1,1-dichloroethene at 6.0 ppb; trans-1,2-dichloroethene at 410 ppb; cis-1,2-dichloroethene at 680 ppb; and trichloroethene at 99 ppb. Dichloroethene and vinyl chloride are created through the degradation of trichloroethene. MW-10 was the only monitoring well to exhibit trichloroethene and its breakdown products, while the downgradient monitoring wells exhibited significantly lower concentrations of the breakdown products of vinyl chloride and dichloroethenes. Because no VOC contamination was detected in the soil borings at these corresponding areas, there does not appear to be a soil source for this VOC groundwater contamination. The other VOC detected in the groundwater was methyl tert-butyl ether (MTBE) at 57 ppb at monitoring well MW-17. As depicted in Figure 7, monitoring well MW-17 straddles the site's northeast property border. Since no other detections of MTBE were revealed during the RI, it does not appear that MTBE is a site related groundwater contaminant of concern.

These impacted monitoring wells, MW-10, MW-23, MW-25, and MW-26, were re-sampled in December 2006 to determine the effectiveness of the soil excavation IRM that was performed adjacent to the VOC groundwater contamination plume. The levels of trichloroethene and its breakdown products all decreased in MW-10 to the following concentrations: trichloroethylene at 11 ppb, vinyl chloride at non-detect; 1,1-dichloroethene at non-detect; trans-1,2-dichloroethene at non-detect; and cis-1,2-dichloroethene at 8.2 ppb. The levels of breakdown products (vinyl chloride, trans-1,2-dichloroethene, and cis-1,2-dichloroethene) slightly increased in MW-23, while there was a decrease in cis-1,2-dichloroethene and vinyl chloride in MW-25, and the concentrations of contaminants in MW-26 generally remained the same. This decrease in trichloroethene in MW-10, along with the increase of breakdown products in MW-23, suggest evidence of biodegradation. The most downgradient VOC-impacted monitoring wells, MW-25 and MW-26, showed no increase in contamination, indicating that the VOC groundwater contamination plume appears to be contained on site.

Groundwater contamination identified during the RI/RAR was partially addressed during the IRM soil excavation and UST removal as described in Section 5.2.

Soil Vapor/Sub-Slab Vapor/Air

The soil vapor intrusion evaluation included the collection of sub-slab soil vapor and outdoor air samples to evaluate the potential for exposures via soil vapor intrusion. Three soil gas samples were collected within the area of the future office building foundation as indicated in Figure 2. Six soil gas samples were collected within the municipal parking lot area, as indicated in Figure 2, to determine the potential for vapor intrusion in the event that the site should undergo future redevelopment. There were detections of VOCs and SVOCs above the NYSDOH guidance values and EPA BASE Data Background Levels as provided in the NYSDOH "Guidance for Evaluating Soil Vapor Intrusion in the State of New York".

5.2: Interim Remedial Measures

An interim remedial measure (IRM) is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the RI/RAR. In response to the preliminary findings of the Remedial Investigation in October 2005, a soil excavation and UST removal IRM was performed to address the subsurface contamination on site. During the excavation activities, excavation dewatering and active groundwater treatment via carbon filtration was performed. Approximately 12,360 gallons of groundwater was evacuated and treated from the excavation prior to discharge to the sanitary sewer system.

During the excavation activities, four USTs were located, ranging from 275-gallon to 1000-gallon capacity, and were subsequently emptied, cleaned, and properly disposed of off-site. The vertical extent of excavation varied across the site, with depths ranging from approximately 5 feet deep to approximately 20 feet deep in the areas of deeper contamination. In total, approximately 9,614 tons of contaminated soil was excavated and transported for off-site disposal.

The post-excavation confirmatory samples were analyzed for VOCs and SVOCs only, as the preliminary results from the RI revealed that SVOCs and VOCs were the primary contaminants of concern. Seventy-two (72) post-excavation soil samples were collected. As indicated in Table 2, only seven VOCs were detected slightly above SCGs. These results confirm that a majority of the site's SVOC and VOC contamination was addressed through the implementation of the IRM.

To prevent exposures to soil gas concentrations beneath the soon to be occupied building on site, the developer of the four-story office building that is currently under construction, installed a sub-slab vapor abatement system in the future office building. This sub-slab vapor abatement system will be in operation upon completion of the building construction.

5.3: Summary of Human Exposure Pathways:

This section describes the types of human exposures that may present added health risks to persons at or around the site. A more detailed discussion of the human exposure pathways can be found in Section 7.0 of the RI reports, which are located in the document repositories.

An exposure pathway describes the means by which an individual may be exposed to contaminants originating from a site. An exposure pathway has five elements: [1] a contaminant source, [2] contaminant release and transport mechanisms, [3] a point of exposure, [4] a route of exposure, and [5] a receptor population.

The source of contamination is the location where contaminants were released to the environment (any waste disposal area or point of discharge). Contaminant release and transport mechanisms carry contaminants from the source to a point where people may be exposed. The exposure point is a location where actual or potential human contact with a contaminated medium may occur. The route of exposure is the manner in which a contaminant actually enters or contacts the body (e.g., ingestion, inhalation, or direct contact). The receptor population is the people who are, or may be, exposed to contaminants at a point of exposure.

An exposure pathway is complete when all five elements of an exposure pathway exist. An exposure pathway is considered a potential pathway when one or more of the elements currently does not exist, but could in the future.

There are no known completed exposure pathways at the site. Potential exposure pathways include inhalation of contaminated soil vapors, dermal contact with impacted sub-surface soils or ingestion of groundwater containing volatile organic compounds.

Use of the site will be limited to restricted residential, but the continued commercial use is currently planned at this time. To address the potential for contaminated soil vapors to impact indoor air quality in the future on-site office building, an active sub-slab depressurization system will be installed during construction. Any changes in the use of the remainder of the site will require an evaluation of the potential for soil vapor intrusion and mitigation, if necessary.

The site is paved, therefore, contact with residual contaminated soil is unlikely. Maintenance of the pavement will be required, and the NYSDEC will require notification prior to any ground intrusive work to prevent the potential for exposures.

On-site groundwater is not used for potable or irrigation purposes, making exposures unlikely. Restrictions will be placed to prevent future use of the groundwater, and monitoring will continue.

5.4: Summary of Environmental Assessment

This section summarizes the assessment of existing and potential future environmental impacts presented by the site prior to the IRM. Environmental impacts include existing and potential future exposure pathways to fish and wildlife receptors, as well as damage to natural resources such as aquifers and wetlands. The site, and all adjacent property, is a developed area with buildings, paved areas, and little to no vegetation. Contamination detected on site was a localized source, which was partially addressed during the IRM, that has not migrated and will not migrate from the site to impact any off-site resources. Therefore, no complete or potentially complete environmental exposure pathways or ecological risks were identified. However, site contamination has impacted the groundwater resource in the overburden aquifer.

SECTION 6: SUMMARY OF THE REMEDIATION GOALS, SELECTED REMEDY, AND THE PROPOSED USE OF THE SITE

Goals for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375. At a minimum, the remedy selected must eliminate or mitigate all significant threats to public health and/or the environment presented by the hazardous substances disposed at the site through the proper application of scientific and engineering principles.

Prior to the completion of the IRM described in Section 5.2, the remediation goals for this site were to eliminate or reduce to the extent practicable:

- exposures of persons at or around the site to VOC and SVOC soil contamination exceeding SCGs.
- the release of contaminants from soil into groundwater that may create exceedances of groundwater quality standards; and
- the release of contaminants from subsurface soil under buildings, into indoor air through soil vapor.

The main SCGs applicable to this project are as follows:

- ambient groundwater quality standards: groundwater sample results indicate that the main groundwater contaminants of concern are VOCs in the municipal parking lot area. The soil excavation IRM was conducted directly adjacent to the VOC groundwater contaminant plume. The initial post-IRM groundwater sampling results indicate an improvement in groundwater quality with evidence of biodegradation. A long-term groundwater monitoring program would be needed to document the long-term effectiveness of the soil excavation IRM on the site's groundwater quality.
- TAGM 4046 and Part 375-6: the TAGM 4046 soil cleanup objectives for VOCs and SVOCs were used as the soil excavation IRM remediation goals. When compared to the 6 NYCRR Part 375-6 - Remedial Program Soil Cleanup Objectives, only seven VOCs were detected slightly above SCGs in the post-excavation confirmatory samples. These results reveal that a majority of the site's SVOC and VOC contamination was addressed through the implementation of the IRM.

The Department believes that the IRM has accomplished the remediation goals and satisfied the SCGs for the site, provided that groundwater continues to be monitored and a soil management plan is developed to address the residual contaminated soils to prevent human exposures and dispersion of contamination during potential future intrusive activities.

Based on the results of the investigations at the site, the IRM that has been performed, and the evaluation presented here, the Department has selected No Further Action as the preferred alternative for the site. The Department believes that this alternative will be protective of human

health and the environment, and will satisfy all SCGs as described above. Overall protectiveness is achieved through meeting the remediation goals listed above.

The elements of the IRM already completed are:

1. Excavation and off-site disposal of 9,614 tons of contaminated soil;
2. Dewatering and treatment, via carbon filtration, of 12,360 gallons of groundwater; and treated groundwater was discharged to the sanitary sewer system;
3. Backfilling of the excavation with clean, off-site soil; and
4. Excavation and proper closure of four USTs.

Therefore, the Department concludes that No Further Action is needed other than site management, and institutional and engineering controls. The institutional and engineering controls are:

1. Imposition of an institutional control in the form of an environmental easement that will require: (a) limiting the use and development of the property to restricted residential use, which will also permit commercial use in conformance with local zoning; (b) compliance with the approved site management plan; (c) restricting the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by NYSDOH; and (d) submission by the property owner to the Department a periodic certification of institutional and engineering controls.
2. Development of a site management plan which will include the following institutional and engineering controls: (a) notice to the Department of any ground intrusive work or change in use, management of the final cover system to restrict excavation below the pavement layer, or buildings. Excavated soil would be tested, properly handled to protect the health and safety of workers and the nearby community, and would be properly managed in a manner acceptable to the Department; (b) evaluation of the potential for vapor intrusion for any buildings developed on the site, including provision for mitigation of any impacts identified; (c) monitoring of groundwater and (d) provisions for the operation, maintenance, and monitoring of the of the installed sub-slab vapor mitigation system in the office building presently under construction.
3. The property owner would provide a periodic certification of institutional and engineering controls, prepared and submitted by a professional engineer or such other expert acceptable to the Department, until the Department notifies the property owner in writing that this certification is no longer needed. This submittal would: (a) contain certification that the institutional controls and engineering controls put in place are still in place and are either unchanged from the previous certification or are compliant with Department-approved modifications; (b) allow the Department access to the site; and (c) state that nothing has occurred that would impair the ability of the control to protect

public health or the environment, or constitute a violation or failure to comply with the site management plan unless otherwise approved by the Department.

The proposed future use for the Plattsburgh Gateway Project/Durkee Street site is commercial.

SECTION 7: HIGHLIGHTS OF COMMUNITY PARTICIPATION

As part of the environmental restoration process, a number of Citizen Participation activities were undertaken to inform and educate the public about conditions at the site and the potential remedial alternatives. The following public participation activities were conducted for the site:

- Repositories for documents pertaining to the site were established.
- A public contact list, which included nearby property owners, elected officials, local media, and other interested parties, was established.
- A public meeting was held on February 27, 2007 to present and receive comment on the PRAP.
- A responsiveness summary (Appendix A) was prepared to address the comments received during the public comment period for the PRAP.

In general, the public comments received were supportive of the selected remedy.

TABLE 1
Plattsburgh Gateway Project/Durkee Street Site
Nature and Extent of Soil Contamination
 July 2004 - January 2005

SUBSURFACE SOIL (Pre-IRM^c)	Contaminants of Concern	Concentration Range Detected (ppm)^a	SCG^b (ppm)^a	Frequency of Exceeding SCG
Semivolatile Organic Compounds	Benzo(a)anthracene	2.6 to 20	1	4 of 31
	Benzo(a)pyrene	2.1 to 14	1	4 of 31
	Benzo(k)fluoranthene	1.8 to 8.4	1	2 of 31
	Benzo(b)fluoranthene	2.4 to 17	1	4 of 31
	Chrysene	1.8 to 19	1	4 of 31
	Dibenzo(a,h)anthracene	0.78	0.33	1 of 31
Inorganic Compounds	Calcium	38,000 to 117,000	SB ^c	11 of 49
	Iron	3890 to 122,000	2,000	22 of 49
	Magnesium	5080 to 44,200	SB ^c	11 of 49
	Mercury	1.0	0.81	1 of 49

^a ppb = parts per billion, which is equivalent to micrograms per liter, ug/L, in water;
 ppm = parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil;
 ug/m³ = micrograms per cubic meter

^b SCG = standards, criteria, and guidance values: Ambient Water Quality Standards and Guidance Values and Part 5 of the New York State Sanitary Code; Technical and Administrative Guidance Memorandum (TAGM) 4046, Determination of Soil Cleanup Objectives and Cleanup Levels; NYCRR Subpart 375-6 - Remedial Program Soil Cleanup Objectives; and Guidance for Evaluating Soil Vapor Intrusion in New York.

^c IRM = interim remedial measure
 MDL = laboratory minimum detection limit
 SB = site background
 GV = guidance value

TABLE 2
Plattsburgh Gateway Project/Durkee Street Site
Post-IRM^c Confirmatory Soil Sampling Results
 October -December 2005

SUBSURFACE SOIL (Post-IRM^c)	Contaminants of Concern	Concentration Range Detected (ppm)^a	SCG^b (ppm)^a	Frequency of Exceeding SCG
Semivolatile Organic Compounds	Benzo(a)anthracene	1.1 to 16	1	10 of 72
	Benzo(a)pyrene	0.085 to 15	1	9 of 72
	Benzo(b)fluoranthene	1.3 to 16	1	12 of 72
	Benzo(k)fluoranthene	1.2 to 5.9	1	5 of 72
	Chrysene	1.1 to 15	1	10 of 72
	Dibenzo(a,h)anthracene	0.39 to 1.1	0.33	3 of 72
	Indeno(1,2,3-cd)pyrene	0.65 to 7.9	0.5	6 of 72

^a ppb = parts per billion, which is equivalent to micrograms per liter, ug/L, in water;
 ppm = parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil;
 ug/m³ = micrograms per cubic meter

^b SCG = standards, criteria, and guidance values: Ambient Water Quality Standards and Guidance Values and Part 5 of the New York State Sanitary Code; Technical and Administrative Guidance Memorandum (TAGM) 4046, Determination of Soil Cleanup Objectives and Cleanup Levels; NYCRR Subpart 375-6 - Remedial Program Soil Cleanup Objectives; and Guidance for Evaluating Soil Vapor Intrusion in New York.

^c IRM = interim remedial measure
 MDL = laboratory minimum detection limit
 SB = site background
 GV = guidance value

TABLE 3
Plattsburgh Gateway Project/Durkee Street Site
Groundwater Nature and Extent of Contamination
 July 2004

GROUNDWATER	Contaminants of Concern	Concentration Range Detected (ppb)^a	SCG^b (ppb)^a	Frequency of Exceeding SCG
Volatile Organic Compounds (VOCs)	Methyl Tert-Butyl Ether	57	10	1 of 12
	Vinyl Chloride	2.2 to 170	2	3 of 12
	1,1-Dichloroethene	6.0	5	1 of 12
	Trans-1,2-Dichloroethene	8.0 to 410	5	2 of 12
	Cis-1,2-Dichloroethene	6.0 to 180	5	4 of 12
	Trichloroethene	11 to 99	5	1 of 12
Semivolatile Organic Compounds (SVOCs)	Bis(2-Ethylhexyl) Phthalate	5.3	5	1 of 12
Inorganic Compounds	Iron	1,380 to 38,200	300	6 of 7
	Lead	80.5	25	1 of 7
	Magnesium	50,400 to 128,000	35,000(GV ^c)	7 of 7
	Manganese	713 to 1,720	300	6 of 7
	Sodium	224,000 to 1,790,000	20,000	6 of 7

^a ppb = parts per billion, which is equivalent to micrograms per liter, ug/L, in water;
 ppm = parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil;
 ug/m³ = micrograms per cubic meter

^b SCG = standards, criteria, and guidance values: Ambient Water Quality Standards and Guidance Values and Part 5 of the New York State Sanitary Code; Technical and Administrative Guidance Memorandum (TAGM) 4046, Determination of Soil Cleanup Objectives and Cleanup Levels; NYCRR Subpart 375-6 - Remedial Program Soil Cleanup Objectives; and Guidance for Evaluating Soil Vapor Intrusion in New York.

^c IRM = interim remedial measure
 MDL = laboratory minimum detection limit
 SB = site background
 GV = guidance value

TABLE 4
Plattsburgh Gateway Project/Durkee Street Site
Post-IRM^c Groundwater Sampling Results
 December 2006

GROUNDWATER (Post-IRM^c)	Contaminants of Concern	Concentration Range Detected (ppb)^a	SCG^b (ppb)^a	Frequency of Exceeding SCG
Volatile Organic Compounds (VOCs)	Methyl Tert-Butyl Ether	57	10	1 of 6
	Vinyl Chloride	1.7 to 13	2	1 of 6
	Cis-1,2-Dichloroethene	4.1 to 32	5	3 of 6

^a ppb = parts per billion, which is equivalent to micrograms per liter, ug/L, in water;
 ppm = parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil;
 ug/m³ = micrograms per cubic meter

^b SCG = standards, criteria, and guidance values: Ambient Water Quality Standards and Guidance Values and Part 5 of the New York State Sanitary Code; Technical and Administrative Guidance Memorandum (TAGM) 4046, Determination of Soil Cleanup Objectives and Cleanup Levels; NYCRR Subpart 375-6 - Remedial Program Soil Cleanup Objectives; and Guidance for Evaluating Soil Vapor Intrusion in New York.

^c IRM = interim remedial measure
 MDL = laboratory minimum detection limit
 SB = site background
 GV = guidance value

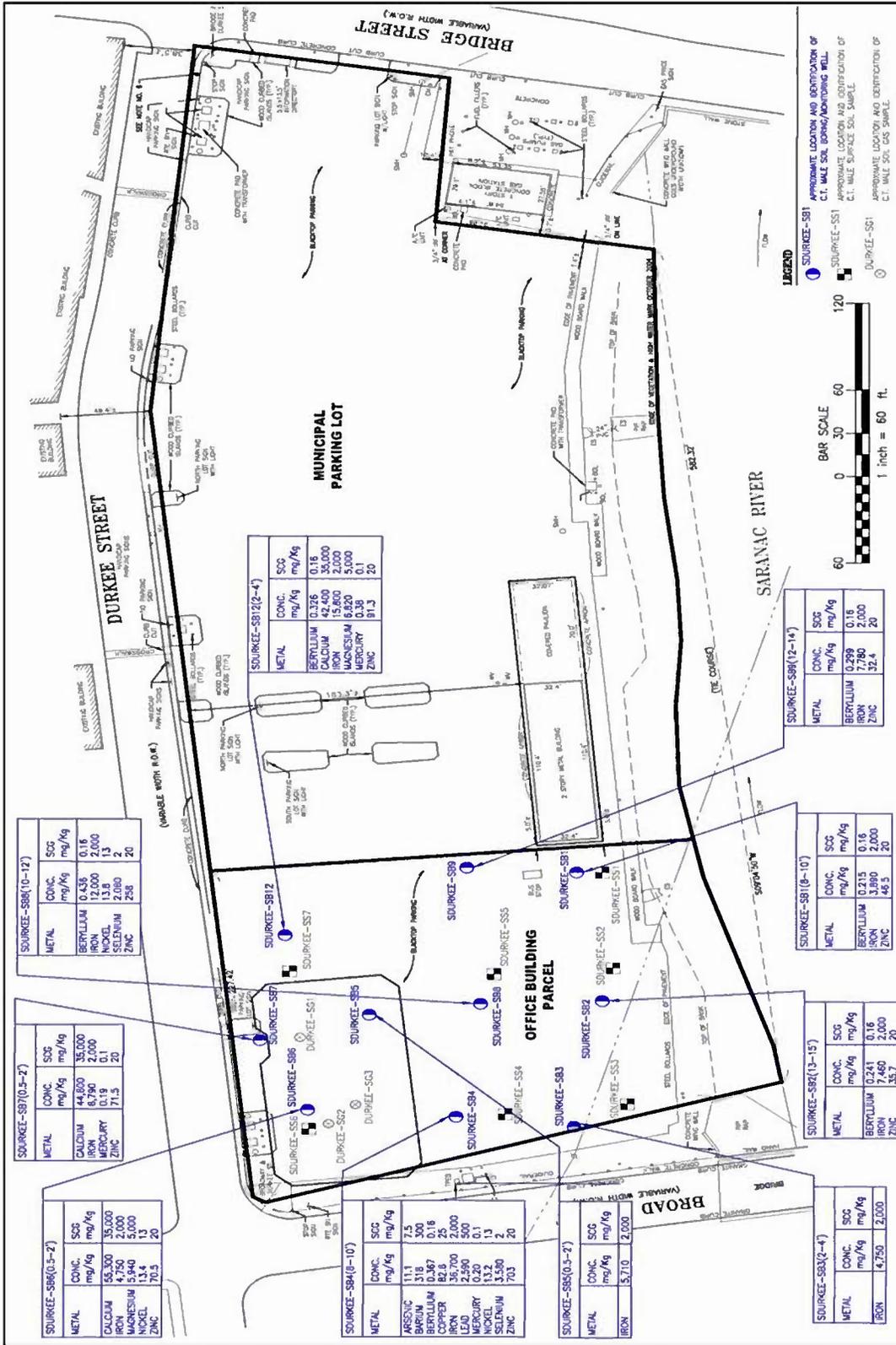


FIGURE 4 METALS ABOVE SCGBs IN SUBSURFACE SOILS LOCATIONS MAP PLATTSBURGH GATEWAY PROJECT DURKEE STREET SITE

CITY OF PLATTSBURGH
CLINTON COUNTY, NY

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FIG4
SHEET 3 OF 6
DWG. NO: 07-0119

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DATE		
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CHECKED :	S. BIEBER	
PROJ. NO :	04-9498	
SCALE :	1" = 60'	
DATE :	JAN. 2007	

NOTE:

- THE LOCATIONS AND FEATURES DEPICTED ON THIS MAP ARE APPROXIMATE AND DO NOT REPRESENT AN ACTUAL FIELD SURVEY.
- BOUNDARY SURVEY, PORTION OF LANDS OF CITY OF PLATTSBURGH DURKEE STREET PARKING LOT, PREPARED BY C.T. MALE ASSOCIATES, P.C., DWG. NO. 04-0676, DATED OCTOBER 5, 2004, REVISED 11/30/04.

MAP REFERENCE:

- SHEET SP-1, PREPARED BY BADEAU ARCHITECTS OF BURLINGTON, VT, DATED 12/15/03, LAST REVISED 3/17/04.

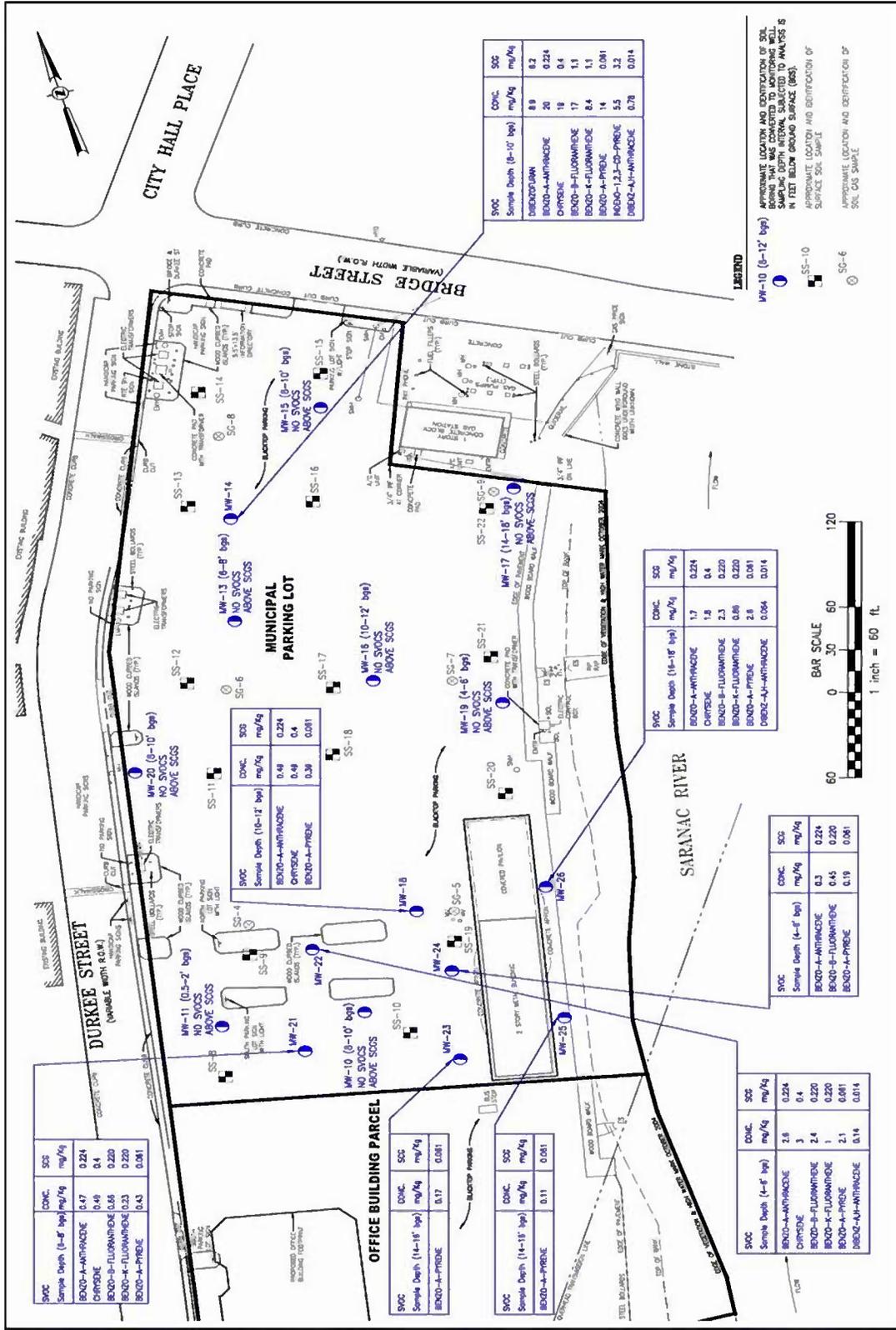


FIGURE 5
SVOCs ABOVE SCGBs IN SUBSURFACE SOIL/FILL LOCATIONS MAP
PLATTSBURGH GATEWAY PROJECT
DURKEE STREET SITE

CITY OF PLATTSBURGH
CLINTON COUNTY, NY

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DESIGNED: C.T. MALE ASSOCIATES, P.C.
DRAFTED: J. MARX
CHECKED: S. BIBBER
PROJ. NO.: 04.9498
SCALE: ±1"=60'
DATE: JAN. 2007

FIG5
SHEET 4 OF 6
DWG. NO: 07-0119

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MAP RETRIEVE:
1. SHEET SP-1, PREPARED BY RABIGEAU ARCHITECTS OF BURLINGTON, VT, DATED 12/15/03, LAST REVISED 3/17/04.
2. BOUNDARY SURVEY, PORTION OF LANDS OF CITY OF PLATTSBURGH DURKEE STREET PARKING LOT, PREPARED BY C.T. MALE ASSOCIATES, P.C., DWG. NO. 04-0870, DATED OCTOBER 5, 2004, REVISED 11/30/04.

DATE	REVISIONS RECORD/DESCRIPTION	DRAFTED	CHECK	APPR.

APPENDIX A

Responsiveness Summary

RESPONSIVENESS SUMMARY
Plattsburgh Gateway Project/Durkee Street Environmental Restoration Site
City of Plattsburgh, Clinton County, New York

Site No. E510020

The Proposed Remedial Action Plan (PRAP) for the Plattsburgh Gateway Project/Durkee Street 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 7, 2007. The PRAP outlined the remedial measure proposed for the contaminated soil and groundwater media at the Plattsburgh Gateway Project/Durkee Street site.

The release of the PRAP was announced by sending a notice to the public contact list, informing the public of the opportunity to comment on the proposed remedy.

A public meeting was held on February 27, 2007, which included a presentation of the Remedial Investigation (RI) and the Remedial Alternatives Report (RAR), 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 25, 2007.

This responsiveness summary responds to all questions and comments raised during the public comment period. The following are the comments received, with the Department's responses:

COMMENT 1: Where are the HVAC intakes on the office building in comparison to the vapor vents?

RESPONSE 1: The vapor vent is located on the eastern side or leeward side of the building. The building code requires a minimum of ten feet of separation between the HVAC intake and the vapor discharge point. However, the actual distance will be more than ten feet by nature of the HVAC unit being located in the center of the building.

COMMENT 2: Is testing of the vapor part of the ongoing management of the project?

RESPONSE 2: The vapor ventilation system will be managed pursuant to the Site Management Plan to be developed for the site. The Site Management Plan will outline the specific testing and monitoring of the system's operating components, including the vapor exhaust system.

COMMENT 3: Is the sub-slab system difficult to maintain?

RESPONSE 3: No, the system generally requires that a negative pressure be maintained under the building slab and is typically monitored by a pressure gauge. A qualified contractor will be required to maintain the system according to the Site Management Plan.

COMMENT 4: Could you elaborate on the periodic certification of institutional and engineering controls requirement?

RESPONSE 4: The periodic certifications will need to be prepared and submitted by a professional engineer or such other expert acceptable to the Department. The expert will certify that the institutional

and engineering controls put in place are still in place and are either unchanged from the previous certification or are compliant with Department-approved modifications.

COMMENT 5: Will the management requirements be described in detail in the final project plans?

RESPONSE 5: The Site Management Plan will further elaborate, specify and document the operation, long term maintenance and monitoring requirements for the site.

COMMENT 6: When will the project plan be finalized?

RESPONSE 6: It is expected that the proposed remedy will be selected and documented in the Record of Decision, which is expected to be finalized by March 31, 2007. The Site Management Plan will be developed shortly after the execution of the Record of Decision.

COMMENT 7: Will the requirements of the management plan be essentially the same as what has been described in the PRAP?

RESPONSE 7: Correct, the specifics of the management plan will be further documented in the Site Management Plan.

COMMENT 8: How high are the vapor vents on top of the office building?

RESPONSE 8: The vapor discharge vent is being incorporated into the design of the building in that it will not protrude from the rooftop and cannot be seen from the surrounding landscape.

APPENDIX B

Administrative Record

Administrative Record

**Plattsburgh Gateway Project/Durkee Street Site
Site No. E510020**

1. Proposed Remedial Action Plan for the Plattsburgh Gateway Project/Durkee Street site, dated February 2007, prepared by the Department.
2. PRAP Availability Fact Sheet, February 2007, prepared by the Department.
3. "Remedial Investigation Work Plan", December 2004, prepared by C.T. Male Associates.
4. Site Investigation Fact Sheet, May 2005, prepared by the Department.
5. Interim Remedial Measures Fact Sheet, July 2005, prepared by the Department.
6. "Final Remedial Investigation Report, Operable Unit No. 1", January 2007, prepared by C.T. Male Associates.
7. "Final Remedial Investigation Report, Operable Unit No. 2", January 2007, prepared by C.T. Male Associates.
8. "Final Remedial Alternatives Analysis Report, Operable Unit No. 1", January 2007, prepared by C.T. Male Associates.
9. "Remedial Alternatives Analysis Report, Operable Unit No. 2", January 2007, prepared by C.T. Male Associates.