

**Site Management Plan (SMP) Checklist
for BCP, ERP, SSF and VCP sites**

Site Name:

Location:

Site No.:

Project Manager:

The SMP for a site remedial program must include at a minimum an Institutional and Engineering Control Plan as well as provision for the periodic certification of the institutional control and engineering controls (IC/EC certification) and may include, as required by the remedy, a Site Monitoring Plan and Operation & Maintenance Plan. Each of these individual areas of reporting will need to meet the minimum requirements detailed below.

The SMP being reviewed addresses:

- The entire site
- An operable unit of the site identified as: _____
- An IRM for operable unit ___ identified as _____
- A groundwater restriction or short term engineering control for an otherwise unrestricted use site

The SMP period for this site, after an initial 18 month review, will be:

- Annually** **Every 3 years** **Every 5 years** **Every 10 years**

Institutional and Engineering Control Plan:

- Must include a complete description of all institutional and/or engineering controls employed at the site, including the mechanisms that will be used to continually implement, maintain, monitor, and enforce such controls both by the applicant, the applicant's successors and assigns, and by state or local government is presented.
- Appropriate plans for implementation of the engineering and institutional controls, such as for handling soils removed from beneath a soil cover or cap during maintenance or redevelopment of the site. This includes media-specific implementation plans, such as plans for:
 - Soil management which detail procedures for handling soil excavated from below a soil cover or cap during maintenance or redevelopment of the site (e.g., a soils management plan);
 - Installation/operation of sub-slab vapor depressurization systems, or other types of systems to address vapor intrusion;
 - Engineering control inspection plans, for the remedy as implemented or to be installed as part of the site development, such as for a cap or cover system.

- A periodic review report which includes the IC/EC certification as well as all other reporting of the IC/ECs, site monitoring and/or operation and maintenance of the remedy.

Institutional Control and Engineering Control (IC/EC) Certification: The applicant or site owner must make a periodic certification of the IC/EC to the Department. The requirements of this periodic IC/EC certification will be described in the SMP and the certification must be included in the periodic review report, which is prepared and submitted for the Department-approved certification period. The IC/EC certification will clearly identify the periodic review period and certify that:

- The institutional controls and/or engineering controls employed at such site are:
 - unchanged from the date the control was put in place, unless otherwise approved by the Department;
 - in place and effective;
 - performing as designed;
 - nothing has occurred that would impair the ability of the controls to protect the public health and environment; and
 - nothing has occurred that constitutes a violation or failure to comply with any operation and maintenance plan for such controls.
- Use of the site complies with the environmental easement;
- Access to the site will be provided to the Department to evaluate the remedy and verify continued maintenance of such controls.
- If a financial assurance mechanism is required, the mechanism remains valid and sufficient for the intended purpose.

If the remedy requires only institutional controls, the certification may be made by the property owner. If the remedy includes engineering controls, the certification must be made by a qualified environmental professional or, if engineering evaluations are required, a licensed professional engineer.

- For BCP sites: For those sites determined to be non-significant threat sites, but where contaminants in groundwater contravene drinking water standards at the site border, in addition to the items noted above; the remedial party will also have to certify:
 - That no new information has come to the site owner's attention, including groundwater monitoring data from wells located at the site boundary, to indicate that the assumptions made in the qualitative exposure assessment of off-site contamination are no longer valid; and
 - Every five years, that the assumptions made in the qualitative exposure assessment remain valid.

Site Monitoring Plan: Includes, as appropriate for the site remedy, sampling and analysis plans for monitoring groundwater, soil vapor or another media as identified by the decision document for the site, designed to:

- If none is required for the remedy which is the subject of this SMP, check here.
- Assess the remedy's compliance with groundwater standards.
- Assess the remedy's compliance with the cleanup objectives of any other impacted media.
- Evaluate site information periodically to confirm that the remedy continues to be effective for the protection of public health and the environment.
- Prepare the necessary reports of the results of this monitoring for a period determined by the Department.

Operation & Maintenance Plan: Includes, as appropriate for the site remedy, a plan(s) which:

- If none is required for the remedy which is the subject of this SMP, check here.
- Identify the operation and maintenance activities necessary for the continued operation of the components of the remedy, including provision for evaluation of the systems and recommendations to optimize performance.
- Evaluating site information periodically to confirm that the remedy continues to be effective for the protection of public health and the environment.
- Preparing the necessary reports of the results of this evaluation for a period determined by the Department.

Site Management Plan Template

Instructions to DEC Project Manager

The DEC Project Manager may delete chapters and sections of this template that don't apply to a specific site before sending it to the Remedial Party. Alternatively, non-applicable chapters or sections may be identified in scoping discussions.

Instructions to Remedial Party / Qualified Environmental Professional

This document is a template for development of a Site Management Plan (SMP) for remedial projects performed under the management of NYSDEC, Division of Environmental Remediation. This document is intended to expedite development of a site-specific SMP. By providing format and general content guideline, it is intended to increase the predictability of format and content required for agency approval; shorten the document preparation time by Applicants in the program; improve the quality of draft SMP submittals; shorten the review time by NYSDEC; and streamline the process for SMP approval by NYSDEC. This is a generic and non-site-specific document that does not address all possible health or environmental issues of concern to NYSDEC or NYSDOH. It is provided as a supplement to DER-10 and is not a substitute for the agency review and comment process.

For many sites, entire chapters or sections of this template, such as Chapter 4 (Operation and Maintenance), may not be applicable and should be deleted. Project managers and remedial parties should use judgement in determining which components of this template are relevant to specific projects. Many of the sections contain summaries of information from previous documents (investigation reports, final engineering reports, etc.). The purpose of summarizing this information in this document is to provide a single, concise resource for future owners or site workers to understand the remedial history and nature of site contamination. The level of detail for this information should be similar to an executive summary.

Note: This template may also be used to develop an Interim Site Management Plan, by which an interim remedial measure or operable unit is monitored, operated

and/or maintained before the remedy for the entire site is complete. In this case, the document should be titled and introduced as an interim plan.

This document contains blue text, green text and highlighted bracketed items. Blue text indicates text that is generally acceptable to NYSDEC for use in the site-specific SMP. While it must be applied to each site in a manner that is suitable for site-specific conditions, use of this blue text with minimal changes will generally promote a more timely acceptance of the SMP by NYSDEC. Green text provides guidance on the recommended content in each of the specific sections of the SMP and should be deleted from this template prior to submittal. Items highlighted in blue brackets are variable and should be entered in a manner that is self-explanatory and specific to each case.

It is strongly recommended that the draft SMP submittal to NYSDEC adhere to the following conventions:

- Retain the original blue text color for all blue text that is not changed.
- Use black text for all new text, including any changes to blue text.
- Delete all green text
- Remove highlights
- A track changes redline/strikeout method should be used for all removal and replacement of blue text.
- The redline/strikeout document should be submitted (with blue text strikeouts in the text and not in the margins) along with a clean copy of the draft SMP to NYSDEC.

While this approach is not mandatory, it should greatly shorten the review time required by NYSDEC staff and expedite approval of the document.

The following template is a working document and may be modified and improved periodically. Comments and suggestions for improvement are welcome. Contact the NYSDEC's project manager when you begin preparing the SMP to ensure that you have the most recent version.

[Site Name]
[COUNTY], NEW YORK

Site Management Plan

NYSDEC Site Number: **xxxxxxx**

Prepared for:
[Remedial Party Name]
[Address]

Prepared by:
[Name]
[Address]
[Phone]

Revisions to Final Approved Site Management Plan:

Revision #	Submitted Date	Summary of Revision	DEC Approval Date

[MONTH YEAR]

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SITE MANAGEMENT PLAN

1.0 INTRODUCTION AND DESCRIPTION OF REMEDIAL PROGRAM

1.1 INTRODUCTION

If this is an interim site management plan, discuss here as appropriate.

This document is required as an element of the remedial program at [Project Name] (hereinafter referred to as the “Site”) under the New York State (NYS) [Select one: Brownfield Cleanup Program (BCP) , Environmental Restoration Program (ERP) , Inactive Hazardous Waste Disposal Site Remedial Program , Voluntary Cleanup Program (VCP)] administered by New York State Department of Environmental Conservation (NYSDEC). The site was remediated in accordance with [Select one: Brownfield Cleanup Agreement (BCA) Index# , State Assistance Contract (SAC) # , Order on Consent Index # , Voluntary Cleanup Agreement (VCA) #] Wx-xxxx-xx-xx, Site # xxxxxx, which was executed on [month day, year] [and last amended on month day, year].

1.1.1 General

[Remedial Party name(s)] entered into a [BCA, SAC, Order on Consent, VCA] with the NYSDEC to remediate a [size] acre property located in [Village, County, City], New York. This [BCA, SAC, Order on Consent, VCA] required the Remedial Party, [Name(s)], to investigate and remediate contaminated media at the site. A figure showing the site location and boundaries of this [size]-acre [“site” or “area subject to this plan”] is provided in Figure [#]. The boundaries of the site are more fully described in the metes and bounds site description that is part of the Environmental Easement.

Note: the easement will not be available when the SMP is drafted. If the metes and bounds are available when the SMP is prepared, this should be included as an

appendix and referenced. Also, if the institutional control for the site is a restrictive covenant rather than an easement, change all references to “easement” to “deed restriction” in this document.

After completion of the remedial work described in the Remedial Action Work Plan, some contamination was left in the subsurface at this site, which is hereafter referred to as ‘remaining contamination.’ This Site Management Plan (SMP) was prepared to manage remaining contamination at the site until the Environmental Easement is extinguished in accordance with ECL Article 71, Title 36. All reports associated with the site can be viewed by contacting the NYSDEC or its successor agency managing environmental issues in New York State.

This SMP was prepared by [Environmental Consultant name], on behalf of [Remedial Party name(s)], in accordance with the requirements in NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation, dated [month, year], and the guidelines provided by NYSDEC. This SMP addresses the means for implementing the Institutional Controls (ICs) and Engineering Controls (ECs) that are required by the Environmental Easement for the site.

1.1.2 Purpose

The site contains contamination left after completion of the remedial action. Engineering Controls 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 to the NYSDEC, and recorded with the [county] County Clerk, will require compliance with this SMP and all ECs and ICs placed on the site. The ICs place restrictions on site use, and mandate operation, maintenance, monitoring and reporting measures for all ECs and ICs. This SMP specifies the methods necessary ensure compliance with all ECs and ICs required by the Environmental Easement for contamination that remains at the site. This plan 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 Engineering and Institutional Controls; (2) media monitoring; (3) operation and maintenance of all treatment, collection, containment, or recovery systems; (4) performance of periodic inspections, certification of results, and submittal of Periodic Review Reports; and (5) defining criteria for termination of treatment system operations.

To address these needs, this SMP includes three plans: (1) an Engineering and Institutional Control Plan for implementation and management of EC/ICs; (2) a Monitoring Plan for implementation of Site Monitoring; (3) an Operation and Maintenance Plan for implementation of remedial collection, containment, treatment, and recovery systems (including, where appropriate, preparation of an Operation and Maintenance Manual for complex systems).

This plan also includes a description of Periodic Review Reports for the periodic 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 the environmental easement, which is grounds for revocation of the Certificate of Completion (COC);
- Failure to comply with this SMP is also a violation of Environmental Conservation Law, 6NYCRR Part 375 and the [BCA, SAC, Order on Consent, VCA] (Index #xx-xxxx-xx-xx; Site #xxxxxx) for the site, and thereby subject to applicable penalties.

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

This section should provide the same level of detail, and may be copied from, the Decision Document or Record of Decision for the site. This should provide a concise description of the location; history; nature and extent of contamination, both

before and after the remedy; and remedy that is sufficient for someone not familiar with the remedial project to implement the SMP. Anticipate that this may be the only document available in the future to someone who may be conducting work at the site.

1.2.1 Site Location and Description

The site is located in the [Municipality Name] County of [County Name], New York and is identified as Block xxxx and Lot xxx on the [Municipality or County Name] Tax Map. The site is an approximately [x]-acre area bounded by [road, feature] to the north, [road, feature] to the south, [road, feature] to the east, and [road, feature] to the west (see Figure [x]). The boundaries of the site are more fully described in Appendix [x] – Metes and Bounds.

1.2.2 Site History

This section should be short and concise but comprehensive. This section should:

- Briefly describe past uses and ownership;
- Reference historical reports (Phase 1, Phase 2, Sanborn Fire Insurance Maps);
- Describe former structures, processes and activities, particularly if structures remain after remediation at the surface or in the subsurface;

1.2.3 Geologic Conditions

This section should be short and concise but comprehensive, particularly as it relates to the remedy and monitoring. This section should briefly describe:

- Lithology (including historical fill) with thicknesses:
 - geologic cross section(s) (Figure);
- Hydrogeology:
 - depth to groundwater;
 - groundwater flow directions, local and regional;
 - Groundwater flow figure with data (Figure);

The following text should be included somewhere in this section:

A geologic section is shown in Figure [x].

A groundwater flow figure is shown in Figure [x].

1.3 SUMMARY OF REMEDIAL INVESTIGATION FINDINGS

A Remedial Investigation (RI) was performed to characterize the nature and extent of contamination at the site. The results of the RI are described in detail in the following reports:

List all Remedial Investigation reports prepared, with specific titles and dates. Include off-site findings as applicable.

Generally, the RI determined that (Describe the conceptual model of on-site and off-site contamination, and any areas of concern requiring remediation. This should be a broad overview of pre-remedial contamination at the site, similar to the level of detail in the ROD or Decision Document. This should answer the question, “why was remediation performed?”)

Below is a summary of site conditions when the RI was performed in (year(s)):

Soil

This section should describe the original site conditions prior to the remedy:

- Contaminant classes and major compounds or elements identified in soil/fill;
- Ranges of contaminant concentrations for primary contaminants and comparison. Include table(s) or figure(s) as warranted.

Site-Related Groundwater

This section should describe the original groundwater conditions, both on-site and off-site, prior to the remedy:

- Summary of groundwater data:
 - Contaminants classes and major compounds in groundwater.
 - Include table(s) or figure(s) as warranted.
- Relationship of groundwater contamination to original sources;
- Information necessary to support groundwater components of the Monitoring Plan.

Site-Related Soil Vapor Intrusion

This section should describe the original soil vapor intrusion conditions, both on-site and off-site, prior to the remedy:

- Summary of soil vapor data;
 - Contaminant classes and major compounds in ambient air, indoor air, soil vapor and sub-slab soil vapor.
 - Ranges and maximum concentrations.
- Include table(s) or figure(s) as warranted.
- Relationship of soil vapor contamination to original sources;
- Information necessary to support soil vapor components of the Monitoring Plan;

Underground Storage Tanks

This section should include:

- Original locations, contents and other pertinent information.

Note: Add other sections, as necessary, for other pertinent environmental media or features such as surface water and sediment; underground piping, vaults, etc.

1.4 SUMMARY OF REMEDIAL ACTIONS

The site was remediated in accordance with the NYSDEC-approved [Remedial Design, Remedial Action Work Plan, Interim Remedial Measure Work Plan, etc.] dated [month, year] and [add any supplemental RA Work Plans, etc. here].

The following is a summary of the Remedial Actions performed at the site:

This section should include a comprehensive and concise summary of the Remedial Action performed for the site and a numbered bullet list of remedial elements. This may be drawn from the description provided in the Executive Summary of the RAWP or Remedial Design, or from the draft Final Engineering Report. Examples are provided below and may be used as appropriate.

1. Excavation of soil/fill exceeding [unrestricted, restricted residential, commercial, industrial] SCOs listed in Table [x], [add: to a depth of x feet or bedrock, as applicable];
2. Construction and maintenance of a soil cover system consisting of [summary of cover types] to prevent human exposure to remaining contaminated soil/fill remaining at the site;
3. Execution and recording of an Environmental Easement to restrict land use and prevent future exposure to any contamination remaining at the site.
4. [Other major remedial elements including all Institutional Controls listed here: see later section for list of common Institutional Controls.];
5. Development and implementation of a Site Management Plan for long term management of remaining contamination as required by the Environmental Easement, which includes plans for: (1) Institutional and Engineering Controls, (2) monitoring, (3) operation and maintenance and (4) reporting;

Remedial activities were completed at the site in [month, year].

1.4.1 Removal of Contaminated Materials from the Site

This section should describe:

- Soil cleanup objectives used for the site.
- Materials removed.
- Quantities removed.
- Locations of material removed:
 - Figures of excavation and materials removed
 - Figures of backfill areas.

The following text should be included somewhere in this section:

A list of the soil cleanup objectives (SCOs) for the primary contaminants of concern (COCs) and applicable land use for this site is provided in Table [x].

A figure showing areas where excavation was performed is shown in Figure [x].
Provide a contour figure showing the thickness of cut and backfill if available.

1.4.2 Site-Related Treatment Systems

This section should describe:

- Treatment systems installed, both on-site and off-site, if any. These include enhanced groundwater treatment applications and vapor mitigation systems, but not containment barriers or caps;
- In-situ solidification or other form of injected treatment - processes and materials employed;
- All LNAPL or DNAPL recovery systems
- Locations of systems:
 - Figure showing system locations.

Or state the following:

No long-term treatment systems were installed as part of the site remedy.

1.4.3 Remaining Contamination

This section should provide a sufficient summary of contamination remaining at the site that anyone performing future excavations at the site can anticipate the environmental conditions they will encounter.

- A narrative description of the remaining contamination, including:
 - A description of the demarcation layer;
 - A description of the depths at which the demarcation layer or surface of remaining contamination will be encountered, and at which contamination is no longer expected. If the upper surface of the remaining contamination zone varies due to differing cover types, a figure showing the elevations of top of remaining contamination zone should be included. Similarly the thickness of the remaining contamination zone may be shown on a figure.
 - If certain areas of the site contain source areas or higher levels of contamination than others, these should be described.

- If active utility lines or other subsurface infrastructure are present at the site, contaminant levels in these areas must be described, so that future maintenance activities can be properly planned.
- If contamination was not remediated due to the presence of buildings or critical infrastructure, and the decision document required this contamination to be removed if such infrastructure is replaced, this must be discussed. Alternatively, if this contamination is not to be remediated, this should also be identified.
- A summary of all contaminated soil and structures left on-site after remedy is complete. Include the following as applicable:
 - Table of exceedances of applicable/relevant Track 1 SCOs (Part 375-6) after Remedial Action;
 - Figure of exceedances of applicable/relevant Track 1 SCOs (Part 375-6) after Remedial Action (i.e., below the cover system);
 - Figure of areas complying with unrestricted SCOs (Part 375-6) after Remedial Action;

The following text should be included somewhere in this section:

Table [x] and Figure [x] summarize the results of all soil samples remaining at the site after completion of Remedial Action that exceed the Track 1 (unrestricted) SCOs.

Figure [x] summarizes the results of all soil samples remaining at the site after completion of Remedial Action that meet the SCOs for unrestricted use of the site.

2.0 ENGINEERING AND INSTITUTIONAL CONTROL PLAN

2.1 INTRODUCTION

2.1.1 General

Since remaining contaminated soil [and groundwater/soil vapor] exists beneath the site, Engineering Controls and Institutional Controls (EC/ICs) are required to protect human health and the environment. This Engineering and Institutional Control Plan describes the procedures for the implementation and management of all EC/ICs at the site. The EC/IC Plan is one component of the SMP and is subject to revision by NYSDEC.

2.1.2 Purpose

This plan provides:

- A description of all EC/ICs on the site;
- The basic implementation and intended role of each EC/IC;
- A description of the key components of the ICs set forth in the Environmental Easement;
- A description of the features to be evaluated during each required inspection and periodic review;
- A description of plans and procedures to be followed for implementation of EC/ICs, such as the implementation of the Excavation Work Plan for the proper handling of remaining contamination that may be disturbed during maintenance or redevelopment work on the site; and
- Any other provisions necessary to identify or establish methods for implementing the EC/ICs required by the site remedy, as determined by the NYSDEC.

2.2 ENGINEERING CONTROLS

2.2.1 Engineering Control Systems

2.2.1.1 Soil Cover [or Cap]

Exposure to remaining contamination in soil/fill at the site is prevented by a soil cover system placed over the site. This cover system is comprised of a minimum of [12 inches or 24 inches] of clean soil, asphalt pavement, concrete-covered sidewalks, and concrete building slabs [add other components as appropriate]. The Excavation Work Plan that appears in Appendix A outlines the procedures required to be implemented in the event the cover system is breached, penetrated or temporarily removed, and any underlying remaining contamination is disturbed. Procedures for the inspection and maintenance of this cover are provided in the Monitoring Plan included in Section 4 of this SMP.

2.2.1.x [Other ECs: e.g. Sub-slab Depressurization Systems; Air Sparging/Soil Vapor Extraction Systems; etc...]

Each additional section should include a description, including figures as appropriate, of the system design, operation and objective, including:

- Components, materials and layout;
- Location of systems;
- Operating conditions;
- Treatment systems instituted; and
- Remedial objective.

The following text should be included somewhere in each section:

Procedures for operating and maintaining the [remedial system name] system are documented in the Operation and Maintenance Plan (Section 4 of this SMP). Procedures for monitoring the system are included in the Monitoring Plan (Section 3 of this SMP). The Monitoring Plan also addresses severe condition inspections in the event that a severe condition, which may affect controls at the site, occurs.

2.2.2 Criteria for Completion of Remediation/Termination of Remedial Systems

Generally, remedial processes are considered completed when effectiveness monitoring indicates that the remedy has achieved the remedial action objectives identified by the decision document. The framework for determining when remedial processes are complete is provided in Section 6.6 of NYSDEC DER-10.

2.2.2.1 Composite Cover System

The composite cover system is a permanent control and the quality and integrity of this system will be inspected at defined, regular intervals in perpetuity.

[2.2.2.x Sub-slab Depressurization System (SSDS)]

The following text should be included somewhere in this section:

The active SSD system will not be discontinued unless prior written approval is granted by the NYSDEC. In the event that monitoring data indicates that the SSD system is no longer required, a proposal to discontinue the SSD system will be submitted by the property owner to the NYSDEC and NYSDOH.

[2.2.2.x Air Sparging/Soil Vapor Extraction System [AS/SVE System]

The AS/SVE system will not be discontinued unless prior written approval is granted by the NYSDEC. In the event that monitoring data indicates that the AS/SVE system is no longer required, a proposal to discontinue the system will be submitted by the property owner. Conditions that warrant discontinuing the AS/SVE system include contaminant concentrations in groundwater that: (1) reach levels that are consistently below ambient water quality standards, (2) have become asymptotic to a low level over an extended period of time as accepted by the NYSDEC, or (3) the NYSDEC has determined that the AS/SVE system has reached the limit of its effectiveness. This assessment will be based in part on post-remediation contaminant levels in groundwater collected from monitoring wells located throughout the site. Systems will remain in place and operational until permission to discontinue their use is granted in writing by the NYSDEC.

[2.2.2.x Monitored Natural Attenuation]

Groundwater monitoring activities to assess natural attenuation will continue, as determined by the NYSDEC, until residual groundwater concentrations are found to be consistently below NYSDEC standards or have become asymptotic at an acceptable level over an extended period. Monitoring will continue until permission to discontinue is granted in writing by the NYSDEC. If groundwater contaminant levels become asymptotic at a level that is not acceptable to the NYSDEC, additional source removal, treatment and/or control measures will be evaluated.

2.3 INSTITUTIONAL CONTROLS

A series of Institutional Controls is required by the [ROD, RAWP or Decision Document] to: (1) implement, maintain and monitor Engineering Control systems; (2) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination; and, (3) limit the use and development of the site to [usage type] uses only. Adherence to these Institutional Controls on the site is required by the Environmental Easement and will be implemented under this Site Management Plan. These Institutional Controls are:

List all Institutional Controls; use following as appropriate; this list should match the remedy for the site and the Environmental Easement.

- Compliance with the Environmental Easement and this SMP by the Grantor and the Grantor's successors and assigns;
- All Engineering Controls must be operated and maintained as specified in this SMP;
- All Engineering Controls on the Controlled Property must be inspected at a frequency and in a manner defined in the SMP.
- [Groundwater, soil vapor] and other environmental or public health monitoring must be performed as defined in this SMP;
- Data and information pertinent to Site Management of the Controlled Property must be reported at the frequency and in a manner defined in this SMP;

Note: Institutional Controls may be modified, added or deleted from this list as warranted by site-specific conditions.

Institutional Controls identified in the Environmental Easement may not be discontinued without an amendment to or extinguishment of the Environmental Easement.

The site has a series of Institutional Controls in the form of site restrictions. Adherence to these Institutional Controls is required by the Environmental Easement. Site restrictions that apply to the Controlled Property are:

This list should match the ROD, Decision Document, or other description of the remedy for the site:

- The property may only be used for [use type: e.g. restricted commercial] use provided that the long-term Engineering and Institutional Controls included in this SMP are employed.
- The property may not be used for a higher level of use, such as unrestricted [add restricted residential, commercial, as appropriate] use without additional remediation and amendment of the Environmental Easement, as approved by the NYSDEC;
- All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with this SMP;
- The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use;
- The potential for vapor intrusion must be evaluated for any buildings developed in the area noted on Figure [x], and any potential impacts that are identified must be monitored or mitigated;
- Vegetable gardens and farming on the property are prohibited;
- The site owner or remedial party will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP.

NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC may allow and will be made by an expert that the NYSDEC finds acceptable.

Note: add other sub-sections to this section as appropriate.

2.3.1 Excavation Work Plan

The site [has been, will be] remediated for restricted [use type] use. Any future intrusive work that will penetrate the soil cover or cap, or encounter or disturb the remaining contamination, including any modifications or repairs to the existing cover system will be performed in compliance with the Excavation Work Plan (EWP) that is attached as Appendix A to this SMP. Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a Health and Safety Plan (HASP) and Community Air Monitoring Plan (CAMP) prepared for the site. A sample HASP is attached as Appendix [x] to this SMP that is in current compliance with DER-10, and 29 CFR 1910, 29 CFR 1926, and all other applicable Federal, State and local regulations. Based on future changes to State and federal health and safety requirements, and specific methods employed by future contractors, the HASP and CAMP will be updated and re-submitted with the notification provided in Section A-1 of the EWP. Any intrusive construction work will be performed in compliance with the EWP, HASP and CAMP, and will be included in the periodic inspection and certification reports submitted under the Site Management Reporting Plan (See Section 5).

The site owner and associated parties preparing the remedial documents submitted to the State, and parties performing this work, are completely responsible for the safe performance of all intrusive work, the structural integrity of excavations, proper disposal of excavation de-water, control of runoff from open excavations into remaining contamination, and for structures that may be affected by excavations (such as building foundations and bridge footings). The site owner will ensure that site development activities will not interfere with, or otherwise impair or compromise, the engineering controls described in this SMP.

2.3.2 Soil Vapor Intrusion Evaluation

Prior to the construction of any enclosed structures located over areas that contain remaining contamination and the potential for soil vapor intrusion (SVI) has been identified (see Figure [x]), an SVI evaluation will be performed to determine whether any mitigation measures are necessary to eliminate potential exposure to vapors in the proposed structure. Alternatively, an SVI mitigation system may be installed as an element of the building foundation without first conducting an investigation. This mitigation system will include a vapor barrier and passive sub-slab depressurization system that is capable of being converted to an active system.

Prior to conducting an SVI investigation or installing a mitigation system, a work plan will be developed and submitted to the NYSDEC and NYSDOH for approval. This work plan will be developed in accordance with the most recent NYSDOH “Guidance for Evaluating Vapor Intrusion in the State of New York”. Measures to be employed to mitigate potential vapor intrusion will be evaluated, selected, designed, installed, and maintained based on the SVI evaluation, the NYSDOH guidance, and construction details of the proposed structure.

Preliminary (unvalidated) SVI sampling data will be forwarded to the NYSDEC and NYSDOH for initial review and interpretation. Upon validation, the final data will be transmitted to the agencies, along with a recommendation for follow-up action, such as mitigation. **If the property is owned by a third party, include the following:** Validated SVI data will be transmitted to the property owner within 30 days of validation. **[if applicable add: “If any indoor air test results exceed NYSDOH guidelines, relevant NYSDOH fact sheets will be provided to all tenants and occupants of the property within 15 days of receipt of validated data”]**

SVI sampling results, evaluations, and follow-up actions will also be summarized in the next Periodic Review Report.

2.4 INSPECTIONS AND NOTIFICATIONS

2.4.1 Inspections

Inspections of all remedial components installed at the site will be conducted at the frequency specified in the SMP Monitoring Plan schedule. A comprehensive site-wide inspection will be conducted annually, regardless of the frequency of the Periodic Review Report. The inspections will determine and document the following:

- Whether Engineering Controls 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 Environmental Easement;
- Achievement of remedial performance criteria;
- Sampling and analysis of appropriate media during monitoring events;
- If site records are complete and up to date; and
- Changes, or needed changes, to the remedial or monitoring system;

Inspections will be conducted in accordance with the procedures set forth in the Monitoring Plan of this SMP (Section 3). The reporting requirements are outlined in the Periodic Review Reporting section of this plan (Section 5).

The following text should be included somewhere in each section:

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 NYSDEC.

2.4.2 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 [Select one: Brownfield Cleanup Agreement (BCA), State Assistance Contract (SAC), Order on Consent, Voluntary Cleanup Agreement (VCA)], 6NYCRR Part 375, and/or Environmental Conservation Law.

- 7-day advance notice of any proposed ground-intrusive activities pursuant to the Excavation Work Plan.
- Notice within 48-hours of any damage or defect to the foundations structures that reduces or has the potential to reduce the effectiveness of other Engineering Controls and likewise any action to be taken to mitigate the damage or defect.
- Verbal notice by noon of the following day of any emergency, such as a fire, flood, or earthquake that reduces or has the potential to reduce the effectiveness of Engineering Controls in place at the site, with written confirmation within 7 days that includes 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.

Any change in the ownership of the site or the responsibility for implementing this SMP will include the following notifications:

- At least 60 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser has been provided with a copy of the [Select one: Brownfield Cleanup Agreement (BCA), State Assistance Contract (SAC), Order on Consent, Voluntary Cleanup Agreement (VCA)], and all approved work plans and reports, including this SMP
- Within 15 days after the transfer of all or part of the site, the new owner's name, contact representative, and contact information will be confirmed in writing.

2.5 CONTINGENCY PLAN

Emergencies may include injury to personnel, fire or explosion, environmental release, or serious weather conditions.

Add text as appropriate.

2.5.1 Emergency Telephone Numbers

In the event of any environmentally related situation or unplanned occurrence requiring assistance the Owner or Owner's representative(s) should contact the appropriate party from the contact list below. For emergencies, appropriate emergency response personnel should be contacted. Prompt contact should also be made to [qualified environmental professional]. These emergency contact lists must be maintained in an easily accessible location at the site.

Table [x]: Emergency Contact Numbers

Medical, Fire, and Police:	911
One Call Center:	(800) 272-4480 (3 day notice required for utility markout)
Poison Control Center:	(800) 222-1222
Pollution Toxic Chemical Oil Spills:	(800) 424-8802
NYSDEC Spills Hotline	(800) 457-7362

Table [x]: Contact Numbers

[qualified environmental professional:]	[phone]

* Note: Contact numbers subject to change and should be updated as necessary

2.5.2 Map and Directions to Nearest Health Facility

Site Location: [insert information]

Nearest Hospital Name: [insert information]

Hospital Location: [insert information]

Hospital Telephone: [insert information]

Directions to the Hospital:

1. [insert information]

2.

3.

Total Distance: [insert information]

Total Estimated Time: [insert information]

Map Showing Route from the site to the Hospital:

[insert map]

2.5.3 Response Procedures

As appropriate, the fire department and other emergency response group will be notified immediately by telephone of the emergency. The emergency telephone number list is found at the beginning of this Contingency Plan (Table [x]). The list will also be posted prominently at the site and made readily available to all personnel at all times.

This should include a description of:

- Procedures for spills;
- Evacuation plans;
- Amendments to the contingency plan.

3.0 SITE 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, the soil cover system, and all affected site media identified below. Monitoring of other Engineering Controls is described in Chapter 4, Operation, Monitoring and Maintenance Plan. This Monitoring Plan may only be revised with the approval of NYSDEC.

3.1.2 Purpose and Schedule

This Monitoring Plan describes the methods to be used for:

- Sampling and analysis of all appropriate media (e.g., groundwater, indoor air, soil vapor, soils);
- Assessing compliance with applicable NYSDEC standards, criteria and guidance, particularly ambient groundwater standards and Part 375 SCOs for soil;
- Assessing achievement of the remedial performance criteria.
- Evaluating site information periodically to confirm that the remedy continues to be effective in protecting public health and the environment; and
- Preparing the necessary reports for the various monitoring activities.

To adequately address these issues, this Monitoring Plan provides information on:

- Sampling locations, protocol, and frequency;
- Information on all designed monitoring systems (e.g., well logs);
- Analytical sampling program requirements;
- Reporting requirements;
- Quality Assurance/Quality Control (QA/QC) requirements;
- Inspection and maintenance requirements for monitoring wells;
- Monitoring well decommissioning procedures; and

- Annual inspection and periodic certification.

[Quarterly or Annual] monitoring of the performance of the remedy and overall reduction in contamination on-site [and off-site] will be conducted for the first [length] years. The frequency thereafter will be determined by NYSDEC. Trends in contaminant levels in air, soil, and/or groundwater in the affected areas, will be evaluated to determine if the remedy continues to be effective in achieving remedial goals. Monitoring programs are summarized in Table [x] and outlined in detail in Sections 3.2 and 3.3 below.

Table [x]: Monitoring/Inspection Schedule

Monitoring Program	Frequency*	Matrix	Analysis

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

3.2 SOIL COVER SYSTEM MONITORING

Note that soil cover monitoring is covered separately from the other engineering controls in this chapter of the template because it is a passive component of nearly all site remedies, along with media monitoring. Monitoring of active engineering controls, which are employed at fewer sites, is included with operation and maintenance of these systems in Chapter 4.

3.3 MEDIA MONITORING PROGRAM

Include all media required to be monitored under the site remedy. Since groundwater is the most common medium that is monitored in site management, the outline for groundwater monitoring is provided below. Procedures for monitoring additional media should be described in similar detail in sub-sections 3.3.2 and subsequent sub-sections as necessary.

3.3.1 Groundwater Monitoring

Groundwater monitoring will be performed on a periodic basis to assess the performance of the remedy.

Note: if Monitored Natural Attenuation is a remedial component, specific detail of the methods used is necessary and should be included in this section. See DER-10 Technical Guide for more details.

The network of monitoring wells has been installed to monitor both up-gradient and down-gradient groundwater conditions at the site. The network of on-site [and off-site] wells has been designed based on the following criteria:

This should include a discussion of well placement criteria.

- Provide a figure showing the monitoring well array Figure [x];
- Discuss to depth and units screened (include cross-section);
- Baseline water levels and flow pattern (if different than that presented in Section 1.3);
- Baseline post-remedial groundwater quality conditions Figure [x];
- Table of wells to be sampled and analytes to be tested.
- Monitoring well construction details;

Monitoring well construction logs are included in Appendix [x].

Include a description of frequency and duration

The following text should appear somewhere in this section:

The sampling frequency may be modified with the approval NYSDEC. The SMP will be modified to reflect changes in sampling plans approved by NYSDEC.

Deliverables for the groundwater monitoring program are specified below.

3.3.1.1 Sampling Protocol

All monitoring well sampling activities will be recorded in a field book and a groundwater-sampling log presented in Appendix [x]. Other observations (e.g., well integrity, etc.) will be noted on the well sampling log. The well sampling log will serve as the inspection form for the groundwater monitoring well network.

This section should be consistent with the protocols developed during the investigation phase of the project, and should include a description of:

- Well gauging;
- Well purging;
- Sampling methodology;
- Analytical methodology:
 - Lab certification;
 - Analytical methods;
 - Analytes.

This information may be presented as an appendix, such as a Field Sampling Plan.

3.3.1.2 Monitoring Well Repairs, Replacement And Decommissioning

If biofouling or silt accumulation occurs in the on-site and/or off-site monitoring wells, the wells will be physically agitated/surged and redeveloped. Additionally, monitoring wells will be properly decommissioned and replaced (as per the Monitoring Plan), if an event renders the wells unusable.

Add additional text as necessary.

Repairs and/or replacement of wells in the monitoring well network will be performed based on assessments of structural integrity and overall performance.

The NYSDEC will be notified prior to any repair or decommissioning of monitoring wells for the purpose of replacement, and the repair or decommissioning and replacement process will be documented in the subsequent periodic report. Well decommissioning without replacement will be done only with the prior approval of NYSDEC. Well abandonment will be performed in accordance with NYSDEC's "Groundwater Monitoring Well Decommissioning Procedures." Monitoring wells that are decommissioned because they have been rendered unusable will be reinstalled in the nearest available location, unless otherwise approved by the NYSDEC.

[3.3.x, etc. Soil, Surface Water, Sediment, Biota, etc. Monitoring]

3.4 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 Engineering Controls or monitoring devices. During these inspections, an inspection form will be completed (Appendix [x]). 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;
- Compliance with permits and schedules included in the Operation and Maintenance Plan; and
- Confirm that site records are up to date.

3.5 MONITORING QUALITY ASSURANCE/QUALITY CONTROL

All sampling and analyses will be performed in accordance with the requirements of the Quality Assurance Project Plan (QAPP) prepared for the site (Appendix [x]). Main Components of the QAPP include:

Add or modify text to the following sections as necessary.

- QA/QC Objectives for Data Measurement;
- Sampling Program:
 - Sample containers will be properly washed, decontaminated, and appropriate preservative will be added (if applicable) prior to their use by the analytical laboratory. Containers with preservative will be tagged as such.
 - Sample holding times will be in accordance with the NYSDEC ASP requirements.
 - Field QC samples (e.g., trip blanks, coded field duplicates, and matrix spike/matrix spike duplicates) will be collected as necessary.
- Sample Tracking and Custody;
- Calibration Procedures:
 - All field analytical equipment will be calibrated immediately prior to each day's use. Calibration procedures will conform to manufacturer's standard instructions.
 - The laboratory will follow all calibration procedures and schedules as specified in USEPA SW-846 and subsequent updates that apply to the instruments used for the analytical methods.
- Analytical Procedures;
- Preparation of a Data Usability Summary Report (DUSR), which will present the results of data validation, including a summary assessment of laboratory data packages, sample preservation and chain of custody procedures, and a summary assessment of precision, accuracy, representativeness, comparability, and completeness for each analytical method.
- Internal QC and Checks;

- QA Performance and System Audits;
- Preventative Maintenance Procedures and Schedules;
- Corrective Action Measures.

3.6 MONITORING REPORTING REQUIREMENTS

Forms and any other information generated during regular monitoring events and inspections will be kept on file on-site. All forms, and other relevant reporting formats used during the monitoring/inspection events, will be (1) subject to approval by NYSDEC and (2) submitted at the time of the Periodic Review Report, as specified in the Reporting Plan of this SMP.

All monitoring results will be reported to NYSDEC on a periodic basis in the Periodic Review Report. A letter report will also be prepared [if required by NYSDEC], subsequent to each sampling event. The report (or letter) will include, at a minimum:

- Date of event;
- Personnel conducting sampling;
- Description of the activities performed;
- Type of samples collected (e.g., sub-slab vapor, indoor air, outdoor air, etc);
- Copies of all field forms completed (e.g., well sampling logs, chain-of-custody documentation, etc.);
- Sampling results in comparison to appropriate standards/criteria;
- A figure illustrating sample type and sampling locations;
- Copies of all laboratory data sheets and the required laboratory data deliverables required for all points sampled (to be submitted electronically in the NYSDEC-identified format);
- Any observations, conclusions, or recommendations; and
- A determination as to whether groundwater conditions have changed since the last reporting event.

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

Table [x]: Schedule of Monitoring/Inspection Reports

Task	Reporting Frequency*

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

4.0 OPERATION AND MAINTENANCE PLAN

4.1 INTRODUCTION

If applicable, state:

The site remedy does not rely on any mechanical systems, such as sub-slab depressurization systems or air sparge/ soil vapor extraction systems to protect public health and the environment. Therefore, the operation and maintenance of such components is not included in this SMP.

Or:

This Operation and Maintenance Plan describes the measures necessary to operate, monitor and maintain the mechanical components of the remedy selected for the site. This Operation and Maintenance Plan:

- Includes the steps necessary to allow individuals unfamiliar with the site to operate and maintain the [type] systems;
- Includes an operation and maintenance contingency plan; and,
- Will be updated periodically to reflect changes in site conditions or the manner in which the [type] systems are operated and maintained.

Information on non-mechanical Engineering Controls (i.e. soil cover system) is provided in Section 3 - Engineering and Institutional Control Plan. A copy of this Operation and Maintenance Plan, along with the complete SMP, will be kept at the site. This Operation and Maintenance Plan is not to be used as a stand-alone document, but as a component document of the SMP.

Note: The next portion of the document should cover each of the mechanical ECs individually. Additional guidance for developing detailed O&M Manuals (OM&M Manual Checklist, OM&M Manual Suggested Outline) is available from the NYSDEC's project manager.

4.2 ENGINEERING CONTROL SYSTEM OPERATION AND MAINTENANCE

Separate headings should be created for each individual mechanical EC, such as:

- Sub-slab Depressurization System;
- Air Sparge/Soil Vapor Extraction System;
- Groundwater Treatment System
- Etc.

This general introduction for each mechanical EC should include a description of:

- General introduction for system built;
- System design information;
- Location of as-built drawings (Appendix [x]);
- System start date.

Each EC section should have the following sub-headings and associated descriptions reported individually.

4.2.x.1 Scope

This should include a description of operation and maintenance requirements.

4.2.x.2 System Start-Up and Testing

This should include a description of, as appropriate:

- Manufacturer's recommendations;
- Manual (Appendix [x]);
- Pre-start up inspection;
- Baseline measurements;
- Testing methods:
 - Checks for leaks;
 - Checks of seals;
 - Check of backdrafts;

- Pressure tests;
- System balancing;
- Warning devices;
- Sampling.

The following text should be included somewhere in each EC section:

The system testing described above will be conducted if, in the course of the [type of system] system lifetime, significant changes are made to the system, and the system must be restarted.

4.2.x.3 System Operation: Routine Operation Procedures

This should include a description of:

- Manufacturer's recommendations;
- Troubleshooting Guide (Appendix [x]);
- Adjustment and repairs;
- Operation schedule.

4.2.x.4 System Operation: Routine Equipment Maintenance

This should include a description of:

- Manufacturer's recommendations;
- Inspections;
- Routine maintenance activities and minimum schedules (Appendix [x]).

4.2.x.4 System Operation: Non-Routine Equipment Maintenance

This should include a description of:

- Warning devices initiated;
- Damage;
- Reduced effectiveness;
- System or component replacement.

4.3 ENGINEERING CONTROL SYSTEM PERFORMANCE MONITORING

Separate subheadings should be created for each individual EC, such as:

- Sub-slab Depressurization Monitoring
- Air Sparge/Soil Vapor Extraction Monitoring
- In-situ chemical oxidation monitoring and re-treatment

The introduction for each EC should include a description of:

- General introduction for system built
- System start date
- Description of monitoring system (if any; for instance, monitoring well network)
- Boring/well logs (Appendix [x])

Sample text for this section: “Sub-slab depressurization systems have been installed to mitigate possible soil vapor intrusion into occupied buildings.”

The following text should be included somewhere in each EC section:

Each EC section should have the following sub-headings and associated descriptions reported individually.

4.3.1 Monitoring Schedule

This should include a description of:

- Baseline
- Interval or frequency for inspection
 - Initial inspection frequency for first year/month
 - Long-term inspection frequency

The following text should be included somewhere in each EC section:

Inspection frequency is subject to change with the approval of the NYSDEC. Unscheduled inspections and/or sampling may take place when a suspected failure of the [type] system has been reported or an emergency occurs that is deemed likely to affect

the operation of the system. Monitoring deliverables for the [type] system are specified later in this Plan.

Note: include sub-sections below as applicable.

4.3.2 General Equipment Monitoring

The following text should be included somewhere in each EC section, as appropriate:

A visual inspection of the complete system will be conducted during the monitoring event. [Type] system components to be monitored include, but are not limited to, the following:

Examples provided below for different EC sections:

- for SSD systems:
 - Vacuum blower; and,
 - General system piping.
- for AS/SVE systems:
 - Compressor discharge pressure, flow, and temperature;
 - Vacuum blower, vacuum, flow, and temperature;
 - Individual well head pressure (or vacuum, as applicable); and
 - Effluent concentrations exiting the carbon canisters.

Include the following text in each EC sub-section, where applicable:

A complete list of components to be checked is provided in the Inspection Checklist, presented in Appendix [x]. If any equipment readings are not within their typical range, any equipment is observed to be malfunctioning, or the system is not performing within specifications, maintenance and repair as per the Operation and Maintenance Plan are required immediately, and the [EC type] system restarted.

4.3.3 System Monitoring Devices and Alarms

Examples provided below for different EC sections:

- for AS/SVE systems:

- System monitoring device and alarm notification for SVE vacuum blower failure; System monitoring device and alarm notification for AS compressor failure; and, System monitoring device for low, high, and high-high water level in moisture separator and an alarm notification for high-high moisture separator level.

Include the following text in each EC sub-section, where applicable:

The [EC type] system has a warning device to indicate that the system is not operating properly. In the event that the warning device is activated, applicable maintenance and repairs will be conducted, as specified in the Operation and Maintenance Plan, and the [EC type] system restarted. Operational problems will be noted in the subsequent Periodic Review Report.

4.3.4 Sampling Event Protocol

This should include a description of:

- Methods to be used:
 - Purging, gauging, duration, sampling rates;
 - Baseline tests (i.e. pressure test);
 - Waste management (i.e. fluids).
- Materials to be used;
- Analytical methods:
 - Analytes;
 - Labeling, chain of custody, preservation, holding times;
 - Lab type, certification;
- System integrity (need for repairs).

4.4 MAINTENANCE AND PERFORMANCE MONITORING REPORTING REQUIREMENTS

Maintenance reports and any other information generated during regular operations at the site will be kept on-file on-site. All reports, forms, and other relevant

information generated will be available upon request to the NYSDEC and submitted as part of the Periodic Review Report, as specified in the Section 5 of this SMP.

4.4.1 Routine Maintenance Reports

Checklists or forms (see Appendices [x, x]) will be completed during each routine maintenance event. Checklists/forms will include, but not be limited to the following information:

- Date;
- Name, company, and position of person(s) conducting maintenance activities;
- Maintenance activities conducted;
- Any modifications to the system;
- Where appropriate, color photographs or sketches showing the approximate location of any problems or incidents noted (included either on the checklist/form or on an attached sheet); and,
- Other documentation such as copies of invoices for maintenance work, receipts for replacement equipment, etc., (attached to the checklist/form).

4.4.2 Non-Routine Maintenance Reports

During each non-routine maintenance event, a form will be completed which will include, but not be limited to, the following information:

- Date;
- Name, company, and position of person(s) conducting non-routine maintenance/repair activities;
- Presence of leaks;
- Date of leak repair;
- Other repairs or adjustments made to the system;

- Where appropriate, color photographs or sketches showing the approximate location of any problems or incidents (included either on the form or on an attached sheet); and,
- Other documentation such as copies of invoices for repair work, receipts for replacement equipment, etc. (attached to the checklist/form).

5. INSPECTIONS, REPORTING AND CERTIFICATIONS

5.1 SITE INSPECTIONS

5.1.1 Inspection Frequency

All inspections will be conducted at the frequency specified in the schedules provided in Section 3 Monitoring Plan and Section 4 Operation and Maintenance Plan of this SMP. At a minimum, a site-wide inspection will be conducted annually. Inspections of remedial components will also be conducted when a breakdown of any treatment system component has occurred or whenever a severe condition has taken place, such as an erosion or flooding event that may affect the ECs.

5.1.2 Inspection Forms, Sampling Data, and Maintenance Reports

All inspections and monitoring events will be recorded on the appropriate forms for their respective system which are contained in Appendices [x] [EC system], and [x] [EC system]). Additionally, a general site-wide inspection form will be completed during the site-wide inspection (see Appendix [x]). These forms are subject to NYSDEC revision.

All applicable inspection forms and other records, including all media sampling data and system maintenance reports, generated for the site during the reporting period will be provided in electronic format in the Periodic Review Report.

5.1.3 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;
- Operation and maintenance activities are being conducted properly; and, based on the above items,

- The site remedy continues to be protective of public health and the environment and is performing as designed in the RAWP and FER.

5.2 CERTIFICATION OF [ENGINEERING AND] INSTITUTIONAL CONTROLS

If the remedy includes any engineering controls, include the following:

After the last inspection of the reporting period, a [qualified environmental professional or Professional Engineer licensed to practice in New York State (depending on the need to evaluate engineering systems)] will prepare the following certification:

For each institutional or engineering control identified for the site, I certify that all of the following statements are true:

- The inspection of the site to confirm the effectiveness of the institutional and engineering controls required by the remedial program was performed under my direction;
- The institutional control and/or engineering control employed at this site is unchanged from the date the control was put in place, or last approved by the Department;
- Nothing has occurred that would impair the ability of the control to protect the public health and environment;
- Nothing has occurred that would constitute a violation or failure to comply with any site management plan for this control;
- Access to the site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of this control;
- If a financial assurance mechanism is required under the oversight document for the site, the mechanism remains valid and sufficient for the intended purpose under the document;
- Use of the site is compliant with the environmental easement;
- The engineering control systems are performing as designed and are effective;

- To the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program [and generally accepted engineering practices]; and
- The information presented in this report is accurate and complete.
- I certify that all information and statements in this certification form are true. I understand that a false statement made herein is punishable as a Class “A” misdemeanor, pursuant to Section 210.45 of the Penal Law. I, [name], of [business address], am certifying as [Owner or Owner’s Designated Site Representative] (and if the site consists of multiple properties): [I have been authorized and designated by all site owners to sign this certification] for the site.

The signed certification will be included in the Periodic Review Report described below.

If the remedy requires only an institutional control, include the following:

For each institutional identified for the site, I certify that all of the following statements are true:

- The institutional control employed at this site is unchanged from the date the control was put in place, or last approved by the Department;
- Nothing has occurred that would impair the ability of the control to protect the public health and environment;
- Nothing has occurred that would constitute a violation or failure to comply with any site management plan for this control;
- Access to the site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of this control;
- If a financial assurance mechanism is required under the oversight document for the site, the mechanism remains valid and sufficient for the intended purpose under the document;
- Use of the site is compliant with the environmental easement.
- The information presented in this report is accurate and complete.
- I certify that all information and statements in this certification form are true. I understand that a false statement made herein is punishable as a Class “A”

misdemeanor, pursuant to Section 210.45 of the Penal Law. I, [name], of [business address], am certifying as [Owner or Owner's Designated Site Representative] (and if the site consists of multiple properties): [and I have been authorized and designated by all site owners to sign this certification] for the site.

For projects in the BCP which the Department has determined do not represent a significant threat to public health or the environment, but where contaminants in groundwater exceed drinking water standards, the following should also be included for both EC/IC and IC scenarios listed above:

- No new information has come to my attention, including groundwater monitoring data from wells located at the site boundary, if any, to indicate that the assumptions made in the qualitative exposure assessment of off-site contamination are no longer valid; and

Every five years the following certification will be added:

- The assumptions made in the qualitative exposure assessment remain valid.

The signed certification will be included in the Periodic Review Report described below.

5.3 PERIODIC REVIEW REPORT

A Periodic Review Report will be submitted to the Department every [leave blank for annual or insert second, third, fifth, etc., as appropriate] year, beginning eighteen months after the [Certificate of Completion or equivalent document eg., Satisfactory Completion Letter, No Further Action Letter, etc.] is issued. In the event that the site is subdivided into separate parcels with different ownership, a single Periodic Review Report will be prepared that addresses the site described in Appendix B (Metes and Bounds). 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 Periodic Review Report. The report will include:

- 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 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 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 RAWP, ROD or Decision Document;
 - 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.

If applicable add:

- A performance summary for all treatment systems at the site during the calendar year, 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, effluent and/or effectiveness monitoring; and
- Comments, conclusions, and recommendations based on data evaluation.

Revise as appropriate: The Periodic Review Report will be submitted, in hard-copy format, to the NYSDEC Central Office and Regional Office in which the site is located, and in electronic format to NYSDEC Central Office, Regional Office and the NYSDOH Bureau of Environmental Exposure Investigation.

5.4 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 institutional or engineering control, 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.

APPENDIX A – EXCAVATION WORK PLAN

This plan is similar to the Remedial Action Work Plan and can be largely drawn from the approved version of that final document.

A-1 NOTIFICATION

At least 15 days prior to the start of any activity that is anticipated to encounter remaining contamination, the site owner or their representative will notify the Department. Currently, this notification will be made to:

[Name of Regional Hazardous Waste Remediation Engineer]

Regional Hazardous Waste Remediation Engineer

[Address of Regional Office where the site is located]

This notification will include:

- A detailed description of the work to be performed, including the location and areal extent, plans for site re-grading, intrusive elements or utilities to be installed below the soil cover, estimated volumes of contaminated soil to be excavated and any work that may impact an engineering control,
- 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 summary of the applicable components of this EWP,

Simple excavations may only require compliance with a portion of the EWP. For example, excavation of a small volume of soil from above the water table that is directly loaded for off-site disposal would not require the stockpiling or fluids management provisions of this template.

- A statement that the work will be performed in compliance with this EWP and 29 CFR 1910.120,

- A copy of the contractor's health and safety plan, in electronic format, if it differs from the HASP provided in Appendix [x] of this document,
- Identification of disposal facilities for potential waste streams,
- Identification of sources of any anticipated backfill, along with all required chemical testing results.

A-2 SOIL SCREENING METHODS

Soil screening methodology and sub-slab screening methods should be described here. The following text should be included somewhere in this section:

Visual, olfactory and instrument-based soil screening will be performed by a qualified environmental professional during all remedial and development excavations into known or potentially contaminated material (remaining contamination). Soil screening will be performed regardless of when the invasive work is done 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.

A-3 STOCKPILE METHODS

This section should provide details describing erosion and sedimentation controls for stockpiles. The following text should be included somewhere in this section:

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 available for inspection by NYSDEC.

A-4 MATERIALS EXCAVATION AND LOAD OUT

This section should describe all methods to be followed for materials loading and on-site management prior to leaving the site. The following text should be included somewhere in this section:

A qualified environmental professional or person 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 safe execution of all invasive and other work performed under this Plan.

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 SMP 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, local, and NYSDOT requirements (and all other applicable transportation requirements).

A truck wash will be operated on-site. The qualified environmental professional will be responsible for ensuring that all outbound trucks will be washed at the truck wash before leaving the site until the activities performed under this section are complete.

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.

A-5 MATERIALS TRANSPORT OFF-SITE

This section should describe all methods to be followed for materials management while in transport off-site. The following text should be included somewhere in this section:

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.

All trucks will be washed prior to leaving the site. Truck wash waters will be collected and disposed of off-site in an appropriate manner.

Truck transport routes are as follows: [describe route and provide map]. All trucks loaded with site materials will exit the vicinity of the site using only these approved truck routes. This is the most appropriate route and takes into account: (a) limiting transport through residential areas and past sensitive sites; (b) use of city mapped truck routes; (c) prohibiting off-site queuing of trucks entering the facility; (d) limiting total distance to major highways; (e) promoting safety in access to highways; and (f) overall safety in transport; [(g) community input [where necessary]]

Trucks will be prohibited from stopping and idling in the neighborhood outside the project site.

Egress points for truck and equipment transport from the site will be kept clean of dirt and other materials during site remediation and development.

Queuing of trucks will be performed on-site in order to minimize off-site disturbance. Off-site queuing will be prohibited.

A-6 MATERIALS DISPOSAL OFF-SITE

This section should describe all methods to be followed for materials disposal off-site. The following text should be included somewhere in this section:

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 in accordance with all local, State (including 6NYCRR 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 Periodic Review Report. 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 minimum, as a Municipal Solid Waste per 6NYCRR Part 360-1.2. Material that does not meet Track 1 unrestricted SCOs is prohibited from being taken to a New York State recycling facility (6NYCRR Part 360-16 Registration Facility).

A-7 MATERIALS REUSE ON-SITE

This section should provide all details for methods to be followed for materials reuse on-site. ‘Reuse on-site’ means reuse on-site of material that originates at the site and which does not leave the site during the excavation. The following topics should be covered:

- Procedure for determining if reuse is appropriate:
 - Sampling (methods and analytical)
 - Chemical limits for on-site reuse
 - Table of chemical limits for reuse
 - Stockpile segregation scheme for on-site reuse
 - Size of stockpiles, location (figure)

The following text should be included somewhere in this section:

Chemical criteria for on-site reuse of material have been approved by NYSDEC and are listed in Table [x]. The qualified environmental professional will ensure that procedures defined for materials reuse in this SMP are followed and that unacceptable material does not remain on-site. Contaminated on-site material, including historic fill

and contaminated soil, that is acceptable for re-use on-site will be placed below the demarcation layer or impervious surface, and will not be reused within a cover soil layer, within landscaping berms, or as backfill for subsurface utility lines.

Any demolition material proposed for reuse on-site will be sampled for asbestos and the results will be reported to the NYSDEC for acceptance. Concrete crushing or processing on-site will not be performed without prior NYSDEC approval. Organic matter (wood, roots, stumps, etc.) or other solid waste derived from clearing and grubbing of the site will not be reused on-site.

A-8 FLUIDS MANAGEMENT

The following text should be included somewhere in this section:

All liquids to be removed from the site, including excavation dewatering and groundwater monitoring well purge and development waters, will be handled, transported and disposed in accordance with applicable local, State, and Federal regulations. Dewatering, purge and development fluids will not be recharged back to the land surface or subsurface of the site, but will be managed off-site.

Discharge of water generated during large-scale construction activities to surface waters (i.e. a local pond, stream or river) will be performed under a SPDES permit.

A-9 COVER SYSTEM RESTORATION

The following text should be included somewhere in this section:

After the completion of soil removal and any other invasive activities the cover system will be restored in a manner that complies with the [RAWP, decision document, or Record of Decision]. The demarcation layer, consisting of orange snow fencing material or equivalent material will be replaced to provide a visual reference to the top of the ‘Remaining Contamination Zone’, the zone that requires adherence to special conditions for disturbance of remaining contaminated soils defined in this Site Management Plan. If the type of cover system changes from that which exists prior to the excavation (i.e., a soil cover is replaced by asphalt), (possibly “as shown on Figure [x]” discussed in section 1.4.4”) this will constitute a modification of the cover element of the

remedy and the upper surface of the ‘Remaining Contamination. A figure showing the modified surface will be included in the subsequent Periodic Review Report and in any updates to the Site Management Plan.

A-10 BACKFILL FROM OFF-SITE SOURCES

This section should describe all methods to be followed for the import, handling and placement of backfill material from off-site. The following topics should be covered:

- Source area approval process
 - Sources of backfill material
 - Past use of site
 - Source area background check
 - DOT Certification
 - Chemical sampling
 - Analytes
 - Frequency
 - Imported Soil Chemical Quality Standards
 - Applicability of protection of groundwater SCOs
 - Applicability of protection of ecological resources SCOs
- Procedure for determining if reuse is appropriate
 - Sampling (methods and analytical)
- Stockpile procedures for imported backfill material
 - Size of stockpiles, cover, etc.

The following text should be included somewhere in this section:

All materials proposed for import onto the site will be approved by the qualified environmental professional and will be in compliance with provisions in this SMP prior to receipt at the site.

Material from industrial sites, spill sites, or 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 6NYCRR 375-6.7(d). Based on an evaluation of the land use, protection of groundwater and protection of ecological resources criteria, the resulting soil quality

standards are listed in Table [x]. 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 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.

A-11 STORMWATER POLLUTION PREVENTION

For larger excavations, procedures for stormwater pollution prevention should be specified. For construction projects exceeding 1 acre, this is required. A summary of the Stormwater Pollution Prevention Plan that conforms to the requirements of NYSDEC Division of Water guidelines and NYS regulations should be included here. This plan may be included as an Appendix. The following text should appear somewhere in this section:

Barriers and hay bale checks will be installed and inspected once a week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by NYSDEC. All necessary repairs shall be made immediately.

Accumulated sediments will be removed as required to keep the barrier and hay bale check functional.

All undercutting or erosion of the silt fence toe anchor shall be repaired immediately with appropriate backfill materials.

Manufacturer's recommendations will be followed for replacing silt fencing damaged due to weathering.

Erosion and sediment control measures identified in the SMP shall be observed to ensure that they are operating correctly. Where discharge locations or points are accessible, they shall be inspected to ascertain whether erosion control measures are effective in preventing significant impacts to receiving waters

Silt fencing or hay bales will be installed around the entire perimeter of the construction area.

A-12 CONTINGENCY PLAN

Describe the procedures to be followed upon discovery of an unknown source of contamination that may require remediation (USTs, stained soil, drums, etc.). This should include procedures for suspending excavation work, pumping fluids from tanks or containers, and reporting to the spill hotline. Include the following text:

If underground tanks or other previously unidentified contaminant sources are found during post-remedial 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 full 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 the periodic reports prepared pursuant to Section 5 of the SMP.

A-13 COMMUNITY AIR MONITORING PLAN

This section should provide all details of the Community Air Monitoring Plan. Guidance can be obtained in Appendix 1A of DER-10, Generic Community Air Monitoring Plan. At a minimum, this section must include:

- Details of the perimeter air monitoring program;
- Action levels to be used;

- Methods for air monitoring ;
- Analytes measured and instrumentation to be used;
- A figure of the location(s) of all air monitoring instrumentation. A figure showing specific locations must be presented for monitoring stations based on generally prevailing wind conditions, with a note that the exact locations to be monitored on a given day will be established based on the daily wind direction.

The following text should be included somewhere in this section:

A figure showing the location of air sampling stations based on generally prevailing wind conditions is shown in Figure [x]. These locations will be adjusted on a daily or more frequent basis based on actual wind directions to provide an upwind and at least two downwind monitoring stations. If a sensitive receptor, such as a school, day care or residential area is adjacent to the site, a fixed monitoring station should be located at that site perimeter, regardless of wind direction, and discussed in the text.

Exceedances of action levels listed in the CAMP will be reported to NYSDEC and NYSDOH Project Managers.

A-14 ODOR CONTROL PLAN

The following text should be included somewhere in this section:

This odor control plan is capable of controlling emissions of nuisance odors off-site [and on-site, if there are residents or tenants on the property]. Specific odor control methods to be used on a routine basis will include [define elements]. If nuisance odors are identified at the site boundary, or if odor complaints are received, work will be halted and the source of odors will be identified and corrected. Work will not resume until all nuisance odors have been abated. NYSDEC and NYSDOH will be notified of all odor events and of any other complaints about the project. Implementation of all odor controls, including the halt of work, is the responsibility of the property owner's Remediation Engineer, and any measures that are implemented will be discussed in the Periodic Review Report.

All necessary means will be employed to prevent on- and off-site nuisances. At a minimum, these measures will include: (a) limiting the area of open excavations and size

of soil stockpiles; (b) shrouding open excavations with tarps and other covers; and (c) using foams to cover exposed odorous soils; [add other elements as appropriate]. If odors develop and cannot be otherwise controlled, additional means to eliminate odor nuisances will include: (d) direct load-out of soils to trucks for off-site disposal; (e) use of chemical odorants in spray or misting systems; and, (f) use of staff to monitor odors in surrounding neighborhoods [add others as necessary].

If nuisance odors develop during intrusive work that cannot be corrected, or where the control of nuisance odors cannot otherwise be achieved due to on-site conditions or close proximity to sensitive receptors, odor control will be achieved by sheltering the excavation and handling areas in a temporary containment structure equipped with appropriate air venting/filtering systems.

A-15 DUST CONTROL PLAN

The following text should be included somewhere in this section:

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. The truck will be equipped with a water cannon capable of spraying water directly onto off-road areas including excavations and stockpiles.
- Clearing and grubbing of larger sites will be done in stages to limit the area of exposed, unvegetated soils vulnerable to dust production.
- Gravel will be used on roadways to provide a clean and dust-free road surface.
- On-site roads will be limited in total area to minimize the area required for water truck sprinkling.

A-16 OTHER NUISANCES

The following items may be necessary depending on the type of wastes present, the location of the site and other site-specific concerns. These plans are generally not required for submission to NYSDEC.

A plan for rodent control will be developed and utilized by the contractor prior to and during site clearing and site grubbing, and during all remedial work.

A plan will be developed and utilized by the contractor for all remedial work to ensure compliance with local noise control ordinances.