# **DECISION DOCUMENT**

Park Lane Senior
Brownfield Cleanup Program
Bronx, Bronx County
Site No. C203138
December 2021



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

# **DECLARATION STATEMENT - DECISION DOCUMENT**

Park Lane Senior
Brownfield Cleanup Program
Bronx, Bronx County
Site No. C203138
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# **Statement of Purpose and Basis**

This document presents the remedy for the Park Lane Senior site, a brownfield cleanup site. The remedial program was chosen in accordance with the New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR) Part 375.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the Park Lane Senior site and the public's input to the proposed remedy presented by the Department.

# **Description of Selected Remedy**

The elements of the selected remedy are as follows:

## 1. Remedial Design

A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows;

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse gases and other emissions;
- Increasing energy efficiency and minimizing use of non-renewable energy;
- Conserving and efficiently managing resources and materials;
- Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;
- Maximizing habitat value and creating habitat when possible;
- Fostering green and healthy communities and working landscapes which balance ecological, economic and social goals; and
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.
- Additionally, to incorporate green remediation principles and techniques to the extent feasible in the future development at this site, any future on-site buildings will include, at a minimum, a 20-mil vapor barrier/waterproofing membrane on the foundation to improve

energy efficiency as an element of construction.

## 2. Excavation

Excavation and off-site disposal of contaminant source areas, including soil exceeding the 6 NYCRR Part 371 hazardous criteria for lead. Excavation and off-site disposal of all on-site soils which exceed the restricted residential soil cleanup objectives (SCOs) as defined by 6 NYCRR Part 375-6.8 in the upper 15 feet in the central portion of the site where a basement will be constructed to achieve a Track 2 remedy. If a Track 2 cleanup is achieved, a cover system will not be a required element of the remedy.

For the Track 4 portion of the site, all soils in the upper two feet which exceed restricted residential SCOs will be excavated and transported off-site for disposal. Approximately 5,460 cubic yards of contaminated soil will be removed from the site.

#### 3. Backfill

Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to replace the excavated soil and establish the designed grades at the site.

## 4. Groundwater Extraction & Treatment

Dewatering will be performed to facilitate the excavation of contaminated soil. Contaminated groundwater from dewatering operations will be treated as necessary prior to discharge to the municipal sewer system.

## 5. Cover System

A site cover will be required to allow for restricted residential use of the site in the Track 4 area where the upper two feet of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where a soil cover is to be used it will be a minimum of two feet of soil placed over a demarcation layer, with the upper six inches of soil of sufficient quality to maintain a vegetative layer. Soil cover material, including any fill material brought to the site, will meet the SCOs for cover material for the use of the site as set forth in 6 NYCRR Part 375-6.7(d). Substitution of other materials and components may be allowed where such components already exist or are a component of the tangible property to be placed as part of site redevelopment. Such components may include, but are not necessarily limited to: pavement, concrete, paved surface parking areas, sidewalks, building foundations and building slabs.

## 6. Institutional Controls

Imposition of an institutional control in the form of an environmental easement for the controlled property which will:

- require the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
- allow the use and development of the controlled property for restricted residential use as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- restrict the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or NYCDOH; and
- require compliance with the Department approved Site Management Plan.

# 7. Site Management Plan

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

- a) an Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective:
  - Institutional Controls: The Environmental Easement discussed in Paragraph 6.
  - Engineering Controls: The cover system for the Track 4 portion of the site described in Paragraph 5.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- descriptions of the provisions of the environmental easement including any land use and groundwater use restrictions;
- a provision for evaluation of the potential for soil vapor intrusion for any occupied buildings on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
- a provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in Paragraph 5 above will be placed in any areas where the upper two feet of exposed surface soil exceed the applicable soil cleanup objectives (SCOs);
- provisions for the management and inspection of the identified engineering controls;
- maintaining site access controls and Department notification; and
- the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.
- b) Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:
  - a schedule of monitoring and frequency of submittals to the Department; and
  - monitoring for vapor intrusion for any buildings on the site, as may be required by the Institutional and Engineering Control Plan discussed above.

## **Declaration**

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

December 8, 2021	Ad WBh
Date	Gerard Burke, Director Remedial Bureau B

# **DECISION DOCUMENT**

Park Lane Senior Bronx, Bronx County Site No. C203138 December 2021

# **SECTION 1: SUMMARY AND PURPOSE**

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), has selected a remedy for the above referenced site. The disposal of contaminants at the site has resulted in threats to public health and the environment that would be addressed by the remedy. The disposal or release of contaminants at this site, as more fully described in this document, has contaminated various environmental media. Contaminants include hazardous waste and/or petroleum.

The New York State Brownfield Cleanup Program (BCP) is a voluntary program. The goal of the BCP is to enhance private-sector cleanups of brownfields and to reduce development pressure on "greenfields." A brownfield site is real property, where a contaminant is present at levels exceeding the soil cleanup objectives or other health-based or environmental standards, criteria or guidance, based on the reasonably anticipated use of the property.

The Department has issued this document in accordance with the requirements of New York State Environmental Conservation Law and 6 NYCRR Part 375. This document is a summary of the information that can be found in the site-related reports and documents.

# **SECTION 2: CITIZEN PARTICIPATION**

The Department seeks input from the community on all remedies. A public comment period was held, during which the public was encouraged to submit comment on the proposed remedy. All comments on the remedy received during the comment period were considered by the Department in selecting a remedy for the site. Site-related reports and documents were made available for review by the public at the following document repositories:

DECInfo Locator - Web Application <a href="https://gisservices.dec.ny.gov/gis/dil/index.html?rs=C203138">https://gisservices.dec.ny.gov/gis/dil/index.html?rs=C203138</a>

Soundview Branch Library 660 Soundview Avenue Bronx, NY 10473 Phone: 718-589-0880

Bronx Community Board 9

1967 Turnbull Avenue, Room 7

Bronx, NY 10473 Phone: (718) 823-3034

# **Receive Site Citizen Participation Information By Email**

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

# **SECTION 3: SITE DESCRIPTION AND HISTORY**

## Location:

The site is located at 1940 Turnbull Avenue in the Bronx, NY and is comprised of a single tax lot (Block 3672, Lot 30) totaling approximately 0.3 acres. The site is bounded by Turnbull Avenue to the north, Lot 20 to the west and the south, and Lot 1 to the east. The surrounding streets include Lafayette Avenue to the south, White Plains Road to the west, and Pugsley Avenue to the east.

#### Site Features:

The site is currently used as an asphalt paved parking lot. Areas of the site are landscaped and grassed in the eastern portion in the vicinity of the eastern adjoining residential complex. The site has served as a parking lot since it was developed in the 1970s. The entirety of the site is surrounded by a chain link fence.

# Current Zoning and Land Use:

Zoning for the site is residential (R8) with a commercial overlay (C2-4). The area surrounding the site consists of a mix of one family to multi-family residential, mixed use residential, public facilities including a school, nursing home and post office and commercial properties. The nearest residential area is the Park Lane Apartment complex immediately adjacent to the east of the site. There are also medium density residential buildings less than 500 feet to the southwest across Lafayette Avenue.

## Past Use of the Site:

The site was part of a large wetland river system until the mid-1950s. The surrounding low-lying areas are believed to have been filled in the 1950s to develop the Soundview neighborhood. The origin of the fill materials is unknown. Historic aerial photographs suggest that dumping may have occurred between the 1960s and 1970s during the surrounding neighborhood development. The current site features were constructed in the early 1970s.

# Site Geology & Hydrogeology:

Subsurface soils at the site consists of historic fill materials to depths between 15 and 18 feet below ground surface (bgs). The historic fill consists of sand, gravel, brick, wood, and asphalt. The

subsurface beneath historic fill comprised of silty clay. The land surface is relatively flat with an elevation ranging between 16.10 ft to 17.3 ft above mean sea level. Bedrock was encountered at approximately 40 ft bgs at certain portions of the site during previous site investigations.

Groundwater is present at depths of approximately between 10.43 ft to 11.32 ft bgs and flows in the south-southeast direction. Groundwater in this area of the Bronx is not used as a source of potable water.

A site location map is attached as Figure 1.

# **SECTION 4: LAND USE AND PHYSICAL SETTING**

The Department may consider the current, intended, and reasonably anticipated future land use of the site and its surroundings when evaluating a remedy for soil remediation. For this site, alternatives (or an alternative) that restrict(s) the use of the site to restricted-residential use (which allows for commercial use and industrial use) as described in Part 375-1.8(g) were/was evaluated in addition to an alternative which would allow for unrestricted use of the site.

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

# **SECTION 5: ENFORCEMENT STATUS**

The Applicant(s) under the Brownfield Cleanup Agreement is a/are Volunteer(s). The Applicant(s) does/do not have an obligation to address off-site contamination. However, the Department has determined that this site does not pose a significant threat to public health or the environment; accordingly, no enforcement actions are necessary.

# **SECTION 6: SITE CONTAMINATION**

## **6.1:** Summary of the Remedial Investigation

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

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

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

also be sampled for the presence of contamination. Data collected in the RI influence the development of remedial alternatives. The RI report is available for review in the site document repository and the results are summarized in section 6.3.

The analytical data collected on this site includes data for:

- groundwater
- soil
- soil vapor

# 6.1.1: Standards, Criteria, and Guidance (SCGs)

The remedy must conform to promulgated standards and criteria that are directly applicable or that are relevant and appropriate. The selection of a remedy must also take into consideration guidance, as appropriate. Standards, Criteria and Guidance are hereafter called SCGs.

To determine whether the contaminants identified in various media are present at levels of concern, the data from the RI were compared to media-specific SCGs. The Department has developed SCGs for groundwater, surface water, sediments, and soil. The NYSDOH has developed SCGs for drinking water and soil vapor intrusion. For a full listing of all SCGs see: <a href="http://www.dec.ny.gov/regulations/61794.html">http://www.dec.ny.gov/regulations/61794.html</a>

# 6.1.2: RI Results

The data have identified contaminants of concern. A "contaminant of concern" is a contaminant that is sufficiently present in frequency and concentration in the environment to require evaluation for remedial action. Not all contaminants identified on the property are contaminants of concern. The nature and extent of contamination and environmental media requiring action are summarized below. Additionally, the RI Report contains a full discussion of the data. The contaminant(s) of concern identified at this site is/are:

barium benzo(a)anthracene benzo(a)pyrene lead benzo(b)fluoranthene mercury benzo(k)fluoranthene perfluorooctane sulfonic acid chrysene perfluorooctanoic acid tetrachloroethene (PCE) dibenz[a,h]anthracene indeno(1,2,3-cd)pyrene trichloroethene (TCE) arsenic chromium

The contaminant(s) of concern exceed the applicable SCGs for:

- groundwater
- soil

## **6.2:** Interim Remedial Measures

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

There were no IRMs performed at this site during the RI.

# 6.3: Summary of Environmental Assessment

This section summarizes the assessment of existing and potential future environmental impacts presented by the site. Environmental impacts may include existing and potential future exposure pathways to fish and wildlife receptors, wetlands, groundwater resources, and surface water. The RI report presents a detailed discussion of any existing and potential impacts from the site to fish and wildlife receptors.

Soil and groundwater were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, polychlorinated biphenyls (PCBs), per- and polyfluoroalkyl substances (PFAS), and pesticides. Soil vapor samples were analyzed for VOCs. Based on the investigations conducted to date, the primary contaminants of concern are SVOCs and metals in soil and groundwater and VOCs in soil vapor.

Soil - SVOCs were found at concentrations exceeding the applicable restricted residential soil cleanup objectives (RRSCOs), including benzo(a)anthracene (max of 108 parts per million (ppm); RRSCO is 1 ppm), benzo(a)pyrene (max of 110 ppm; RRSCO is 1 ppm), benzo(b)fluoranthene (max of 95.3 ppm; RRSCO is 1 ppm), benzo(k)fluoranthene (max of 83 ppm; RRSCO is 3.9 ppm), chrysene (max of 96.8 ppm; RRSCO is 3.9 ppm), dibenz(a,h)anthracene (max of 19 ppm; RRSCO is 0.33 ppm), and indeno(1,2,3-cd)pyrene (max of 92.9 ppm; RRSCO is 0.5 ppm). These contaminants were detected in soil borings throughout the site ranging from depths of 0 to 15 feet.

Metal RRSCO exceedances included arsenic (max of 92.7 ppm; RRSCO is 16 ppm), barium (max of 2,810 ppm; RRSCO is 400 ppm), chromium (max of 670 ppm; RRSCO of 180 ppm), lead (max of 60,700 ppm; RRSCO is 400 ppm), and mercury (max of 3.44 ppm; RRSCO is 0.81 ppm). These contaminants were detected in soil borings throughout the middle portion of the site ranging from depths of 0 to 15 feet.

No VOCs, pesticides, or PCBs were found at concentrations exceeding the RRSCOs. No PFAS compounds were found at concentration exceeding the restricted residential guidance values.

Data does not indicate any off-site impacts in soil related to this site.

Groundwater - Exceedances of the NYSDEC Ambient Groundwater Quality Standards (AWQS) for SVOCs included benzo(a)anthracene (max of 0.2 parts per billion (ppb); AWQS of 0.002 ppb), benzo(a)pyrene (max of 0.156 ppb; AWQS of 0.002 ppb), benzo(b)fluoranthene (max of 0.122 ppb; AWQS of 0.002 ppb), benzo(k)fluoranthene (max of 0.133 ppb; AWQS of 0.002 ppb), chrysene (max of 0.178 ppb; AWQS of 0.002 ppb), and indeno(1,2,3-cd)pyrene (max of 0.078 ppb; AWQS of 0.002 ppb). Only naturally-occurring metals were found at concentrations exceeding AWQS. PFAS detections in exceedance of NYSDOH Maximum Contaminant Levels

(MCLs) included perfluorooctanoic acid (PFOA) (max of 21.3 parts per trillion (ppt); MCL of 10 ppt). No pesticides or PCBs were found exceeding AWQS.

Data does not indicate any off-site impacts in groundwater related to this site.

Soil Vapor - Multiple VOCs were detected in the soil vapor, including tetrachloroethene (PCE) (max of 75.5 micrograms per cubic meter, or ug/m3) and trichloroethene (TCE) (max of 0.261 ug/m3).

Data does not indicate any off-site impacts in soil vapor related to this site.

# **6.4:** Summary of Human Exposure Pathways

This human exposure assessment identifies ways in which people may be exposed to site-related contaminants. Chemicals can enter the body through three major pathways (breathing, touching or swallowing). This is referred to as *exposure*.

The site is fenced and is currently a parking lot with intact asphalt, so people will not come in contact with contaminated soils or groundwater unless they dig below the surface materials. People are not coming into contact with the contaminated groundwater because the area is served by a public water supply that is not affected by this contamination. Volatile organic compounds in soil vapor (air spaces within the soil) may move into buildings and affect the indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. Because the site is vacant, the inhalation of site-related contaminants due to soil vapor intrusion does not represent a current concern. The potential may exist for the inhalation of site contaminants due to soil vapor intrusion for any future on-site development. Environmental sampling indicated soil vapor intrusion from site contaminants is not a concern for off-site buildings.

# **6.5:** Summary of the Remediation Objectives

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

The remedial action objectives for this site are:

# **Groundwater**

## **RAOs for Public Health Protection**

 Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards.

## **RAOs for Environmental Protection**

• Remove the source of ground or surface water contamination.

## Soil

## **RAOs for Public Health Protection**

• Prevent ingestion/direct contact with contaminated soil.

# **RAOs for Environmental Protection**

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

# Soil Vapor

# **RAOs for Public Health Protection**

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

## **SECTION 7: ELEMENTS OF THE SELECTED REMEDY**

The alternatives developed for the site and the evaluation of the remedial criteria are presented in the Alternative Analysis. The remedy is selected pursuant to the remedy selection criteria set forth in DER-10, Technical Guidance for Site Investigation and Remediation and 6 NYCRR Part 375.

The selected remedy is a Multiple Cleanup Tracks remedy.

The selected remedy is referred to as the Soil Excavation and Partial Cover System remedy.

The elements of the selected remedy, as shown in Figure 2, are as follows:

# 1. Remedial Design

A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows;

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse gases and other emissions;
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- Conserving and efficiently managing resources and materials;
- Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;
- Maximizing habitat value and creating habitat when possible;
- Fostering green and healthy communities and working landscapes which balance ecological, economic and social goals; and
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.
- Additionally, to incorporate green remediation principles and techniques to the extent feasible in the future development at this site, any future on-site buildings will include, at a minimum, a 20-mil vapor barrier/waterproofing membrane on the foundation to improve energy efficiency as an element of construction.

## 2. Excavation

Excavation and off-site disposal of contaminant source areas, including soil exceeding the 6 NYCRR Part 371 hazardous criteria for lead. Excavation and off-site disposal of all on-site soils which exceed the restricted residential soil cleanup objectives (SCOs) as defined by 6 NYCRR Part 375-6.8 in the upper 15 feet in the central portion of the site where a basement will be constructed to achieve a Track 2 remedy. If a Track 2 cleanup is achieved, a cover system will not be a required element of the remedy.

For the Track 4 portion of the site, all soils in the upper two feet which exceed restricted residential SCOs will be excavated and transported off-site for disposal. Approximately 5,460 cubic yards of contaminated soil will be removed from the site.

## 3. Backfill

Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to replace the excavated soil and establish the designed grades at the site.

# 4. Groundwater Extraction & Treatment

Dewatering will be performed to facilitate the excavation of contaminated soil. Contaminated groundwater from dewatering operations will be treated as necessary prior to discharge to the municipal sewer system.

# 5. Cover System

A site cover will be required to allow for restricted residential use of the site in the Track 4 area where the upper two feet of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where a soil cover is to be used it will be a minimum of two feet of soil placed over a demarcation layer, with the upper six inches of soil of sufficient quality to maintain a vegetative layer. Soil cover material, including any fill material brought to the site, will meet the SCOs for cover material for the use of the site as set forth in 6 NYCRR Part 375-6.7(d). Substitution of other materials and components may be allowed where such components already exist or are a component of the tangible property to be placed as part of site redevelopment. Such components may include, but are not necessarily limited to: pavement, concrete, paved surface parking areas, sidewalks, building foundations and building slabs.

#### 6. Institutional Controls

Imposition of an institutional control in the form of an environmental easement for the controlled property which will:

- require the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
- allow the use and development of the controlled property for restricted residential use as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- restrict the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or NYCDOH; and
- require compliance with the Department approved Site Management Plan.

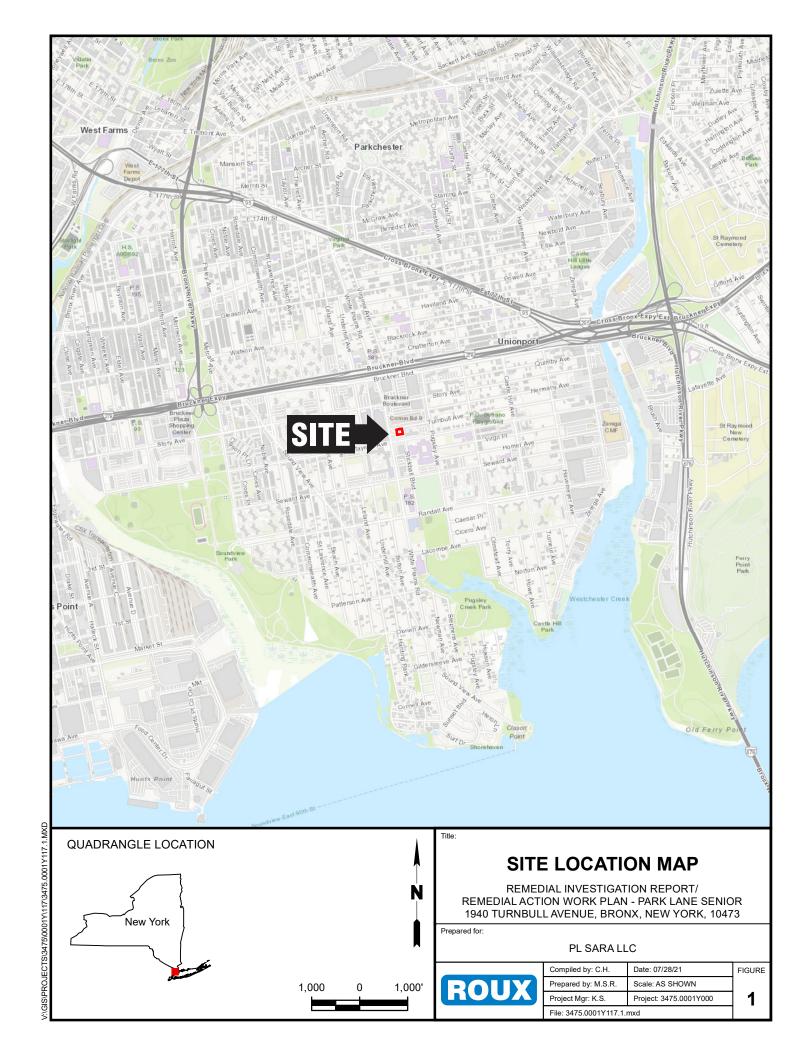
# 7. Site Management Plan

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

- a) an Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective:
  - Institutional Controls: The Environmental Easement discussed in Paragraph 6.
  - Engineering Controls: The cover system for the Track 4 portion of the site described in Paragraph 5.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- descriptions of the provisions of the environmental easement including any land use and groundwater use restrictions;
- a provision for evaluation of the potential for soil vapor intrusion for any occupied buildings on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
- a provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in Paragraph 5 above will be placed in any areas where the upper two feet of exposed surface soil exceed the applicable soil cleanup objectives (SCOs);
- provisions for the management and inspection of the identified engineering controls;
- maintaining site access controls and Department notification; and
- the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.
- b) Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:
  - a schedule of monitoring and frequency of submittals to the Department; and
  - monitoring for vapor intrusion for any buildings on the site, as may be required by the Institutional and Engineering Control Plan discussed above.



# TURNBULL AVENUE

