# **DECISION DOCUMENT**

Ebenezer Plaza 2 **Brownfield Cleanup Program** Brooklyn, Kings County Site No. C224241 September 2020



# NEW YORK STATE OF OPPORTUNITY COPPORTUNITY Conservation

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

# **DECLARATION STATEMENT - DECISION DOCUMENT**

Ebenezer Plaza 2 Brownfield Cleanup Program Brooklyn, Kings County Site No. C224241 June 2020

#### **Statement of Purpose and Basis**

This document presents the remedy for the Ebenezer Plaza 2 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 Ebenezer Plaza 2 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;

- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development; and
- 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:

The existing on-site buildings were demolished and materials which cannot be beneficially reused will be taken off-site for proper disposal in order to implement the remedy.

Excavation and off-site disposal of contaminant source areas, including:

- grossly contaminated soil, as defined in 6 NYCRR Part 375-1.2(u);
- soil with visual waste material or non-aqueous phase liquid; and
- soils which exceed the protection of groundwater soil cleanup objectives (PGWSCOs), as defined by 6 NYCRR Part 375-6.8 for those contaminants found in site groundwater above standards;

Excavation and off-site disposal of all on-site soils which exceed Restricted Residential SCOs, as defined by 6 NYCRR Part 375-6.8.

Approximately 8,500 cubic yards of contaminated soil will be removed from the site.

Excavation and removal of any underground storage tanks (USTs), fuel dispensers, underground piping or other structures associated with a source of contamination.

3. Backfill:

On-site soil which does not exceed the above excavation criteria may be used below the cover system described in Section 4 to backfill the excavation and establish the designed grades at the site.

Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to or complete the backfilling of the excavation and establish the designed grades at the site.

4. Cover System:

A site cover will be required to allow for restricted residential use of the site in areas 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.

5. Vapor Intrusion Evaluation:

A soil vapor intrusion evaluation will be completed. The evaluation will include a provision for implementing actions recommended to address exposures related to soil vapor intrusion.

6. Engineering and Institutional Controls:

Imposition of an institutional control in the form of an environmental easement and a Site Management Plan, as described below, will be required. The remedy will achieve a Track 4 restricted residential cleanup at a minimum and will include imposition of a site cover as a contingency if soil greater than 2 feet, but less than 15 feet deep does not meet the restricted residential SCOs.

## Institutional Control

Imposition of an institutional control in the form of an environmental easement for the controlled property which will: include all that apply, end second to last bullet with "; and" and end final bullet with a period

- 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 or commercial 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:

1. 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 Section 6, above.

Engineering Controls: The soil cover discussed in Section 4.

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 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 Section 4 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.
- 2. A Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:
- monitoring of groundwater to assess the performance and effectiveness of the remedy;
- a schedule of monitoring and frequency of submittals to the Department; and
- monitoring for 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.

September 8, 2020

Ad WBh

Gerard Burke, Director Remedial Bureau B

Date

# **DECISION DOCUMENT**

Ebenezer Plaza 2 Brooklyn, Kings County Site No. C224241 September 2020

#### 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, the redevelopment or reuse of which may be complicated by the presence or potential presence of a contaminant.

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: <u>CITIZEN PARTICIPATION</u>

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 https://gisservices.dec.ny.gov/gis/dil/index.html?rs=C224241

Brooklyn Public Library Spring Creek Branch 12143 Flatlands Ave Brooklyn, NY 11207 Phone: Brooklyn Public Library East Flatbush Branch 9612 Church Ave Brooklyn, NY 11212 Phone:

Brooklyn Community Board 16 444 Thomas Boyland St., Rm. 103 Brooklyn, NY 11233 Phone:

## **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 0.83-acre site is located at 68-78 New Lots Avenue in an urban area in the Brownsville neighborhood of Brooklyn. The site is bordered by New Lots Avenue to the north, Sackman Street to the east, Christopher Avenue to the west and Hegeman Avenue to the south.

Site Features:

Block 3861, Lot 1 and Block 3862, Lot 6 are currently vacant. Buildings on-site have been demolished.

Current Zoning and Land Use:

This site is zoned M1-1 (Industrial) and is currently vacant.

Past Use of the Site:

Past site uses include auto wrecking, auto repair garages, and retail storefronts. Subsurface investigations conducted in 2009 and 2011 identified groundwater impacted by volatile organic compounds (VOCs) extending beneath the northern site area and shallow soil impacted by lead in the southern site area.

#### Site Geology and Hydrogeology:

The site is predominantly underlain by fluvial deposits consisting of medium sand, with lesser but varying amounts of fine and coarse sand. A varying thickness of miscellaneous surficial fill material is also found throughout the site. The water table lies approximately 15 feet below grade and groundwater flows towards the southeast.

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 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 under the Brownfield Cleanup Agreement is a Volunteer. The Applicant 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: <u>Summary of the Remedial Investigation</u>

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 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: <u>http://www.dec.ny.gov/regulations/61794.html</u>

## 6.1.2: <u>RI Results</u>

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:

1,2,4-trimethylbenzene	barium
1,3,5-trimethylbenzene	ethylbenzene
tetrachloroethene (PCE)	xylene (mixed)
arsenic	toluene

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

groundwatersoilsoil vapor intrusion

## 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: <u>Summary of Environmental Assessment</u>

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.

Nature and Extent of Contamination:

Surface Soil: A Remedial Investigation was performed prior to NYSDEC involvement in 2011. After review of the document, a supplemental remedial investigation was performed in 2018 at the request of NYSDEC and NYSDOH. A total of six surface soil samples were collected from the site. Surface soil samples contained elevated concentrations of metals. Barium was detected at a maximum concentration of 3,500 parts per million (ppm), compared to the 400 ppm restricted residential soil cleanup objective (RRSCO).

Subsurface Soil: During the 2018 Supplemental Remedial Investigation, twelve soil borings were installed across the site. Samples were collected and analyzed at areas of observable impact or the groundwater interface. 1,2,4-Trimethylbenzene was detected at a maximum concentration of 173 ppm (RRSCO: 52 ppm and protection of groundwater soil cleanup objective (PGWSCO): 3.6 ppm). 1,3,5-Trimethylbenzene was detected at a maximum concentration of 46.3 ppm (RRSCO: 52 ppm and PGWSCO: 8.4 ppm). Metals also their SCOs on site. Arsenic was detected at a maximum concentration of 29.1 ppm (RRSCO: 16 ppm and PGWSCO: 16 ppm). Barium was detected at a maximum concentration of 1,300 ppm (RRSCO: 400 ppm and PGWSCO: 820 ppm). Cadmium was detected at a maximum concentration of 21.9 ppm (RRSCO: 4.3 ppm and PGWSCO: 7.5 ppm). Copper was detected at a maximum concentration of 971 ppm (RRSCO: 270 ppm and PGWSCO: 1,720 ppm). Lead was detected at a maximum concentration of 4,760 ppm (RRSCO: 400 ppm and PGWSCO: 450 ppm).

Groundwater: Sixteen monitoring wells were installed during the Phase II ESA in 2009 and the subsequent remedial investigation performed prior to NYSDEC involvement in 2011. Based upon the results, two additional monitoring wells were installed during the 2018 NYSDEC approved Supplemental Remedial Investigation. Volatile Organic Compounds (VOCs) were detected in groundwater at concentrations exceeding ambient water quality standards. 1,2,4trimethylbenzene was detected at a maximum concentration of 3,400 parts per billion (ppb) (standard is 5 ppb). 1,3,5-trimethylbenzene was detected at a maximum concentration of 730 ppb (standard is 5 ppb). Tetrachloroethene (PCE) was detected at a maximum concentration of 3,000 ppb (standard is 5 ppb). Toluene was detected at a maximum concentration of 57 ppb (standard is 5 ppb). 1,2-xylene was detected at a maximum concentration of 30 ppb (standard is 5 ppb). 1,3 and 1,4-xylenes were detected at a maximum concentration of 4,300 ppb (standard is 5 ppb).

Soil Vapor: The site is currently undeveloped. Six soil vapor samples were collected throughout the site during the 2018 NYSDEC approved Supplemental Remedial Investigation. PCE was detected at a maximum concentration of 111 micrograms per cubic meter (ug/m3). Trichloroethene (TCE) was detected a maximum concentration of 1.34 ug/m3.

## 6.4: <u>Summary of Human Exposure Pathways</u>

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*.

Access is restricted by a fence. However, people who enter the site may come into contact with contaminants in soil by walking on the site, digging or otherwise disturbing the soil. People are not drinking contaminated groundwater because the area is served by public water supply that is not affected by this contamination. Volatile organic compounds the 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. The site is vacant so inhalation of site contaminants in indoor air via vapor intrusion does not represent a current concern. However, the potential exists for inhalation of site contaminants due to soil vapor intrusion off-site and for any future on-site development.

#### 6.5: <u>Summary of the Remediation Objectives</u>

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

The remedial action objectives for this site are:

#### **Groundwater**

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

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

#### **RAOs for Environmental Protection**

• Remove the source of ground or surface water contamination.

#### <u>Soil</u>

# **RAOs for Public Health Protection**

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

## **RAOs for Environmental Protection**

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

## <u>Soil Vapor</u>

# **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 Track 4: Restricted Residential use with site-specific soil cleanup objectives remedy.

The selected remedy is referred to as the excavation remedy.

The elements of the selected remedy, as shown in Figures 3, 3a and 3b, 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;
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development; and
- 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:

The existing on-site buildings were demolished and materials which cannot be beneficially reused will be taken off-site for proper disposal in order to implement the remedy. Excavation and off-site disposal of contaminant source areas, including:

- grossly contaminated soil, as defined in 6 NYCRR Part 375-1.2(u);
- soil with visual waste material or non-aqueous phase liquid; and
- soils which exceed the protection of groundwater soil cleanup objectives (PGWSCOs), as defined by 6 NYCRR Part 375-6.8 for those contaminants found in site groundwater above standards;

Excavation and off-site disposal of all on-site soils which exceed Restricted Residential SCOs, as defined by 6 NYCRR Part 375-6.8.

Approximately 8,500 cubic yards of contaminated soil will be removed from the site.

Excavation and removal of any underground storage tanks (USTs), fuel dispensers, underground piping or other structures associated with a source of contamination.

3. Backfill:

On-site soil which does not exceed the above excavation criteria may be used below the cover system described in Section 4 to backfill the excavation and establish the designed grades at the site.

Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to or complete the backfilling of the excavation and establish the designed grades at the site.

4. Cover System:

A site cover will be required to allow for restricted residential use of the site in areas 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.

5. Vapor Intrusion Evaluation:

A soil vapor intrusion evaluation will be completed. The evaluation will include a provision for implementing actions recommended to address exposures related to soil vapor intrusion.

6. Engineering and Institutional Controls:

Imposition of an institutional control in the form of an environmental easement and a Site Management Plan, as described below, will be required. The remedy will achieve a Track 4 restricted residential cleanup at a minimum and will include imposition of a site cover as a contingency if soil greater than 2 feet, but less than 15 feet deep does not meet the restricted residential SCOs.

# Institutional Control

Imposition of an institutional control in the form of an environmental easement for the controlled property which will: include all that apply, end second to last bullet with "; and" and end final bullet with a period

- 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 or commercial 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:

1. 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:

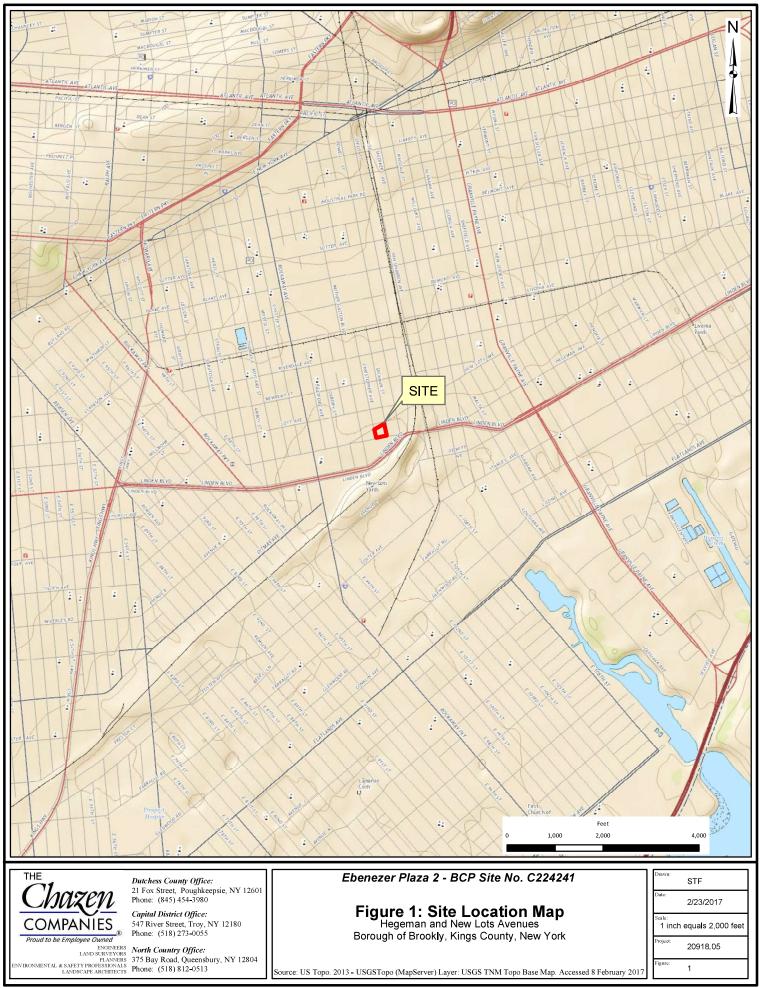
Institutional Controls: The Environmental Easement discussed in Section 6, above.

Engineering Controls: The soil cover discussed in Section 4

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 restrictions;
- a provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in Section 4 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.
- 2. A Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:
- monitoring of groundwater to assess the performance and effectiveness of the remedy;
- a schedule of monitoring and frequency of submittals to the Department; and
- monitoring for vapor intrusion for any buildings on the site, as may be required by the Institutional and Engineering Control Plan discussed above.



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