# **DECISION DOCUMENT**

Former Pfizer Site A
Brownfield Cleanup Program
Brooklyn, Kings County
Site No. C224284
January 2020



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

# **DECLARATION STATEMENT - DECISION DOCUMENT**

Former Pfizer Site A
Brownfield Cleanup Program
Brooklyn, Kings County
Site No. C224284
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# **Statement of Purpose and Basis**

This document presents the remedy for the Former Pfizer Site A 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 Former Pfizer Site A 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**

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 unrestricted SCOs, as defined by 6 NYCRR Part 375-6.8. Approximately 26,500 cubic yards of contaminated soil will be removed from the site.

#### 3. **Backfill**

On-site soil which does not exceed the above excavation criteria or the protection of groundwater SCOs for any constituent may be used to backfill the excavation or re-grade the site.

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

#### 4. **Groundwater Extraction & Treatment**

Dewatering at the site will be required to enable the excavation and subgrade work. Contaminated groundwater from dewatering operations will be treated as necessary prior to discharge to the municipal sewer system.

#### 5. **Vapor Intrusion Evaluation**

As part of the track 1 remedy, 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. **Local Institutional Controls**

If no EE or SMP is needed to achieve soil, groundwater, or soil vapor remedial action objectives, then the following local use restriction will be relied upon to prevent ingestion of groundwater: Article 141 of the NYCDOH code, which prohibits potable use of groundwater without prior approval.

#### Conditional Track 1

The intent of the remedy is to achieve a Track 1 unrestricted use, therefore, no environmental easement or site management plan is anticipated. If the soil vapor intrusion (SVI) evaluation is not completed prior to completion of the Final Engineering Report, then a Site Management Plan (SMP) and Environmental Easement (EE) will be required to address the SVI evaluation and implement actions as needed; if a mitigation or monitoring action is needed, a Track 1 cleanup can only be achieved if the mitigation system or other required action is no longer needed within 5 years of the date of the Certificate of Completion.

In the event that Track 1 unrestricted use is not achieved, including achievement of groundwater and soil vapor remedial objectives, the following contingent remedial elements will be required, and the remedy will achieve a Track 2 restricted residential cleanup.

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### 7. Institutional Control

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 residential use OR 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.

### 8. 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 above.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- a provision for 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;
- descriptions of the provisions of the environmental easement including any land use and groundwater use restrictions;
- 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. a Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:
  - 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.

January 13, 2020	Ad WBh

Date Gerard Burke, Director Remedial Bureau B

# **DECISION DOCUMENT**

Former Pfizer Site A Brooklyn, Kings County Site No. C224284 January 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: 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=C224284">https://gisservices.dec.ny.gov/gis/dil/index.html?rs=C224284</a>

Brooklyn Public Library - Bushwick Branch 340 Bushwick Avenue at Seigel Street Brooklyn, NY 11206 Phone: 718-602-1348

Brooklyn Community Board 1 435 Graham Avenue

Brooklyn, NY 11211 Phone: 718-389-0009

# **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 <a href="http://www.dec.ny.gov/chemical/61092.html">http://www.dec.ny.gov/chemical/61092.html</a>

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

### Location:

The site is located in the Broadway Triangle section of Brooklyn and is comprised of four tax parcels totaling 71,305 square feet (1.63 acres). The irregular shaped site occupies a full block bounded by Wallabout Street, Harrison Avenue, Union Avenue and Walton Street.

#### Site Features:

There are no structures presently on the site. All of the lots are currently used for the storage of trucks and construction equipment. The property is surrounded by an 8 ft high chain-link fence with two gates each on Wallabout Street and Harrison Street, and one gate on Walton Street.

### Current Zoning and Land Use:

The western portion of the site is zoned R8A while the central portion is zoned R7D and the eastern portion is zoned R7A. Each of these zoning designations allow for residential uses. Surrounding land use includes residential apartment buildings to the west, residential apartment buildings and a public school (IS 318) to the north, commercial warehouses, residential buildings and a private school to the east and the Former Pfizer Site C BCP site (site no. C224288) and a charter school to the south.

### Past Use of the Site:

From 1887 through 1918, the site was comprised of mixed commercial and residential properties, including a synagogue, a church, a Mission, laundry, tailor shops and bakeries. A portion of the storage yard of an iron works factory that was replaced by a bottling facility by 1904 was also present at the southwestern-most corner of the site. By 1947, an adhesive manufacturing facility operated in the south-central region of the site at 255/257 Wallabout Street (later Pfizer Building 47), and a lumber yard was present at the west end of the site. A taxi garage located at 249 through 253 Wallabout Street (later Pfizer Building 52) maintained two gasoline underground storage tanks (USTs) and a five-story residential building with delivery services at ground level, located at 58/60 Walton Street, was serviced by a 2,000-gallon fuel oil tank installed in the sidewalk.

Pfizer started using the western region of the site circa 1954 for employee parking and warehousing purposes. The residential buildings along Harrison Avenue were demolished between 1959 and

1961 and replaced by more parking space for Pfizer employees. A small sheet metal workshop was also present at 262 Wallabout Street, close to the southeast corner of the site. By 1977, the majority of the eastern region of the site had been redeveloped into a parking lot and Pfizer used most of the site for parking and warehousing purposes. The small sheet metal workshop was demolished by 1986 and, between 1991 and 1992, the entire block had been razed and has remained vacant to date.

# Site Geography and Geology:

Subsurface soils consist of historic fill materials to a depth of approximately 7 to 10 feet below the surface, followed by silty-clay and fine sand. According to the USGS topographic map for the area (Central Park Quadrangle), the elevation of the property is approximately 16 feet above mean sea level. The area topography is generally flat with little relief and no significant elevation changes. Groundwater occurs beneath the site at a depth of approximately 6-10 feet below grade under perched water table conditions. Based on previous studies performed at the site, groundwater flow is generally to the east. The site is not located within a designated flood zone area.

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 residential use (which allows for restricted-residential use, 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 under the Brownfield Cleanup Agreement is a Participant. The Applicant has an obligation to address on-site and off-site contamination. 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: http://www.dec.ny.gov/regulations/61794.html

### **6.1.2: RI Results**

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

lead indeno(1,2,3-CD)pyrene benzo(a)anthracene trichloroethene (TCE) benzo(a)pyrene mercury benzo(b)fluoranthene arsenic

chrysene arsenic barium

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

# **6.2:** <u>Interim Remedial Measures</u>

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 emerging contaminants (ECs), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, polychlorinated biphenyls (PCBs), and pesticides. Based upon investigations conducted to date, the primary contaminants of concern include lead and SVOCs.

Soil – SVOCS and metals exceeding Unrestricted Use Soil Cleanup Objectives (UUSCOs) were detected in soils throughout the site. SVOCs and metals were found to exceed UUSCOs down to 8 feet below ground surface (ft bgs). A total of 5 locations where levels of lead exceeded the hazardous waste threshold were identified across the site. For SVOCs, the maximum concentration of benzo(a)anthracene was 32 parts per million (ppm) as compared to the UUSCO of 1 ppm, benzo(a)pyrene was 25 ppm (UUSCO is 1 ppm), benzo(b)fluoranthene was 23 ppm (UUSCO is 1 ppm), chrysene was 30 ppm (UUSCO is 1 ppm), and indeno(1,2,3-cd)pyrene of 13 ppm (UUSCO is 0.5 ppm). For metals, the maximum concentration of lead was 4,310 ppm (UUSCO is 63 ppm), mercury was 15.7 ppm (UUSCO is 0.18 ppm), arsenic was 81.1 ppm (UUSCO is 13 ppm), and barium was 5,910 ppm (UUSCO is 350 ppm). Only two VOCs (acetone and methyl ethyl ketone) were detected at concentrations slightly exceeding the UUSCOs; however, these are common lab artifacts and are not considered to be site-specific contaminants of concern. Several pesticides were detected at concentrations nominally exceeding their respective UUSCOs, including 4,4-DDD at 0.035 ppm (UUSCO is 0.0033 ppm) and 4,4-DDE at 0.080 ppm (UUSCO is 0.0033 ppm). For PCBs, the maximum concentration of PCB-1260 was 0.18 ppm (UUSCO is 0.1 ppm). Emerging contaminants (ECs) were also detected in soil samples collected from the shallow intervals down to 17 ft bgs. For example, the maximum concentrations of perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS) were 378 parts per trillion (ppt) and 2,490 ppt, respectively. Data does not indicate any off-site impacts in soil related to this site.

Groundwater – Concentrations of naturally occurring metals were detected in groundwater at concentrations exceeding the ambient water quality standards (AWQS). The maximum concentration of iron was 871 parts per billion (ppb) (AWQS is 300 ppb), manganese was 43,900 ppb (AWQS is 300 ppb), and sodium was 193,000 ppb (AWQS is 20,000 ppb). ECs were also

detected in groundwater samples. The maximum concentrations of PFOA and PFOS are 204 parts per trillion (ppt) and 154 ppt, respectively. No VOCs, PCBs or pesticides were detected at concentrations exceeding the applicable AWQS. Data does not indicate any off-site impacts in groundwater related to this site.

Soil Vapor – Trichloroethene (TCE) was detected in soil vapor at concentrations up to 50.5 micrograms per cubic meter. 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 completely fenced, which restricts public access. However, people who enter the site could contact contaminants in soil by walking on the site, digging or otherwise disturbing the soil. People are not drinking 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. The potential exists for the inhalation of site contaminants due to soil vapor intrusion for future onsite buildings. Environmental sampling indicates that soil vapor intrusion is not a concern for offsite structures.

#### 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.

#### 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.

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# 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 Track 1: Unrestricted use remedy.

The selected remedy is referred to as the Soil Excavation 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;
- 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

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 unrestricted SCOs, as defined by

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6 NYCRR Part 375-6.8. Approximately 26,500 cubic yards of contaminated soil will be removed from the site.

#### 3. **Backfill**

On-site soil which does not exceed the above excavation criteria or the protection of groundwater SCOs for any constituent may be used to backfill the excavation or re-grade the site.

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

#### 4. **Groundwater Extraction & Treatment**

Dewatering at the site will be required to enable the excavation and subgrade work. Contaminated groundwater from dewatering operations will be treated as necessary prior to discharge to the municipal sewer system.

#### 5. **Vapor Intrusion Evaluation**

As part of the Track 1 remedy, 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.

#### **Local Institutional Controls** 6.

If no EE or SMP is needed to achieve soil, groundwater, or soil vapor remedial action objectives, then the following local use restriction will be relied upon to prevent ingestion of groundwater: Article 141 of the NYCDOH code, which prohibits potable use of groundwater without prior approval.

### Conditional Track 1

The intent of the remedy is to achieve a Track 1 unrestricted use, therefore, no environmental easement or site management plan is anticipated. If the soil vapor intrusion (SVI) evaluation is not completed prior to completion of the Final Engineering Report, then a Site Management Plan (SMP) and Environmental Easement (EE) will be required to address the SVI evaluation and implement actions as needed; if a mitigation or monitoring action is needed, a Track 1 cleanup can only be achieved if the mitigation system or other required action is no longer needed within 5 years of the date of the Certificate of Completion.

In the event that Track 1 unrestricted use is not achieved, including achievement of groundwater and soil vapor remedial objectives, the following contingent remedial elements will be required, and the remedy will achieve a Track 2 restricted residential cleanup.

#### 7. **Institutional Control**

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-
- allow the use and development of the controlled property for residential use OR restricted

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- 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.

#### 8. **Site Management Plan**

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

- 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 above.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- a provision for 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;
- descriptions of the provisions of the environmental easement including any land use and groundwater use restrictions;
- 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. a Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:
  - 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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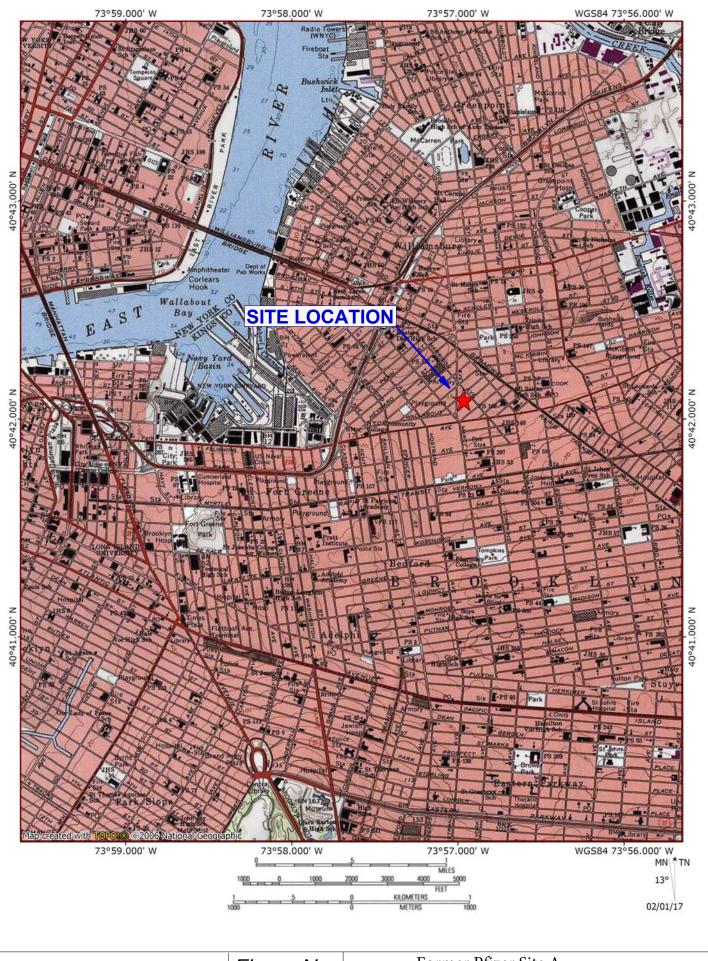


Figure No.

1 Site Name: Former Pfizer Site A

Site Address: 249 WALLABOUT STREET, BROOKLYN, NY

Drawing Title: SITE LOCATION MAP

