DECISION DOCUMENT

Wallace Campus
Brownfield Cleanup Program
Poughkeepsie, Dutchess County
Site No. C314134
January 2023

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

DECLARATION STATEMENT - DECISION DOCUMENT

Wallace Campus
Brownfield Cleanup Program
Poughkeepsie, Dutchess County
Site No. C314134
January 2023

Statement of Purpose and Basis

This document presents the remedy for the Wallace Campus 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 Wallace Campus site and the public's input to the proposed remedy presented by the Department.

Description of Selected Remedy

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 remedial design program will include:

- 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.

Track 1 Area (outside of the Former Wallace Department Store building footprint):

2. Excavation

The existing on-site buildings overlaying contaminated soils will be demolished, except for the historic Wallace Department Store, and materials which can't be beneficially reused on site will be taken off-site for proper disposal in order to implement the remedy.

Excavation and off-site disposal of all on-site soils which exceed Unrestricted Soil Cleanup Objectives (USCOs), as defined by 6 NYCRR Part 375-6.8 except for those beneath the structural footprint of the historic Wallace Department Store. Approximately 7,000 cubic yards of contaminated soil will be removed from this portion of the site. Post-excavation samples will be collected to demonstrate whether USCOs have been achieved. Water removed from subsurface soils to allow for excavation will be properly managed prior to disposal.

3. Backfill

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 designated grades at the site.

While there are no site-related contaminants in the groundwater, use of groundwater as a source of potable or process water is restricted without the required permits and necessary water quality treatment as determined by NYSDOH or County DOH (Dutchess County, Sanitary Code 16.4).

Remainder of site - Area Beneath the Former Wallace Department Store (Track 4)

4. Site Cover

The existing former Wallace Department Store structure will remain and be maintained to allow for restricted residential use of the site. Should the existing building be removed in the future, a site cover shall be placed in this area or material removed such that a site cover would not be required. The site cover may include paved surface parking areas, sidewalks or soil where the upper two feet of exposed surface soil meets the applicable soil cleanup objectives (SCOs) for restricted residential use. Any fill material brought to the site will meet the requirements for the identified site use as set forth in 6NYCRR part 375-6.7(d).

5. 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. This portion of the site remedy will achieve a Track 4 restricted-residential cleanup at a minimum. If the remedy achieves Track 4 in this area (i.e., if soil greater than two feet but less than 15 feet deep does not meet the restricted residential SCOs), the remedy will include imposition of a site cover. See element 4 above.

5a. 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 this portion of the controlled property for restricted residential, commercial, or industrial uses 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 the required permits and necessary water quality treatment as determined by the NYSDOH or County DOH (Dutchess County Sanitary Code, Section 16.4); and,
- require compliance with the Department approved Site Management Plan.

5b. Site Management Plan

i. 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 Element 5a above.

Engineering Controls: The cover system discussed in Element 4 above and the sub-slab depressurization system (if necessary, following the soil vapor intrusion evaluation).

This SMP 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 that should a building foundation or building slab be removed in the future, a cover system consistent with that described in Element 4 above will be placed in any areas where the upper two feet of exposed surface soil exceed the applicable soil cleanup objectives (SCOs), or alternatively soil can be removed such that a site cover is not needed;
- 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.

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.

01/12/2023

Janet E Brown

Date

Janet Brown, Director
Remedial Bureau C

DECISION DOCUMENT

Wallace Campus
Poughkeepsie, Dutchess County
Site No. C314134
January 2023

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 repository:

DECInfo Locator - Web Application
https://www.dec.ny.gov/data/DecDocs/C314134/

Adriance Memorial Library
93 Market Street
Poughkeepsie, NY 12601
Phone: (845) 485-3445

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 consists of the entirety of the contiguous parcels known as 319 Main Street (Block 77, Lot 114098); 325 Main Street (Block 77, Lot 109079), 327-329 Main Street (Block 7, Lot 109077), and 331 Main Street (Block 78, Lot 127091), City of Poughkeepsie, New York. The site is a 2.48-acre commercial property, which abuts Mill Street to the north, Main Street to the south, and Catharine Street to the east.

Site Features:
The southern portion of 319 Main Street currently contains a two-story building (former restaurant and club), 325 and 327-329 Main Street lots each contain a four-story building with rear two-story sections (former bookstore and residence, and active office building, respectively), and the southern/central portions of 331 Main Street contain the four-story former Wallace department store building with a three-story section to the east, utilized for offices and light manufacturing. The remaining northern portions of 319 and 331 Main Street contain paved parking areas, walkways, and yards. Only the former department store on 331 Main Street will remain as part of the redevelopment.

Current Zoning and Land Use:
The site tax lots are zoned C-2, central commercial district (residential use is excluded), and portions of the site fall within the Poughkeepsie Innovation District (PID) Historic Core and Urban Village Zones. The site consists of several vacant and active commercial and light manufacturing uses, located on four tax lots.

Past Use of the Site: The site, first developed prior to 1887, has primarily been a commercial site with some limited past residential use. The most significant commercial uses are generally associated with 331 Main Street, including automotive repair, machining operations, furniture finishing, laundry activities, a department store (located at 331 Main Street), and use of gasoline underground storage tanks (USTs). A limited Phase II Subsurface Investigation performed in 2013 for the northeastern portion of 331 Main Street did not document any storage tanks or contaminated soil, but elevated levels of lead were found in groundwater at 331 Main Street. The buildings at 319 Main Street and 325 Main Street are currently vacant; 327-329 Main Street building is currently in use as an office building and 331 Main Street is in use as an office building and for light manufacturing.

Site Geology and Hydrogeology: State geological data indicate that local soils are likely derived

from glacial till deposits, which overlie metamorphic bedrock. Soils observed during subsurface investigations at the site generally consisted of variable-texture fill (poorly sorted material containing sand and debris, primarily brick and concrete, with some coal and ash) to approximately 1 to 7 feet below ground surface (bgs). Fill is underlain by sands with gravel to depths of 15 feet bgs, with two borings showing layers of clayey-silt below 12 feet bgs. Soils generally below 8 feet bgs appeared to be native, undisturbed material. Bedrock was not encountered at the site during the remedial investigation with maximum boring depths reaching 20 feet bgs. Groundwater was documented in wells at approximately 13 to 15 feet bgs, and direction of flow was determined to be easterly.

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 under the Brownfield Cleanup Agreement is a Volunteer. The Applicant does 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
- indoor air

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:

benzo(a)anthracene	copper
benzo(a)pyrene	lead
benzo(b)fluoranthene	mercury
benzo(k)fluoranthene	nickel
chrysene	zinc
indeno(1,2,3-cd)pyrene	

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 samples were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), pesticides, metals, cyanide, and the emerging contaminants per-and poly fluoroalkyl substances (PFAS) and 1,4-dioxane. Soil vapor samples were analyzed for VOCs. Based on investigations conducted to date, the primary contaminants of concern include SVOCs and metals in soil, typical of historic fill.

Soil - A total of 29 soil samples were collected during the remedial investigation from 19 borings extending 20 feet below ground surface (bgs). Bedrock was encountered at depths ranging from 41 to 62 feet bgs according to a 2020 geotechnical report. Several constituents were identified at concentrations that exceed their Unrestricted Soil Cleanup Objectives (USCOs). The following is a list of those compounds and the maximum exceedance: Acetone 0.065 parts per million (ppm) vs USCO of 0.05 ppm, methylene chloride 0.051 vs USCO of 0.05 ppm, benzo(a)anthracene 5.96 ppm vs USCO of 1 ppm, benzo(a)pyrene 5.15 ppm vs USCO of 1 ppm, benzo(k)fluoranthene 3.62 ppm vs USCO of 0.8 ppm, benzo(b)fluoranthene 3.24 ppm vs USCO of 1 ppm, chrysene 6.67 ppm vs USCO of 1 ppm, dibenzo(a,h)anthracene 0.964 ppm vs USCO of 0.33 ppm, indeno(1,2,3-cd)pyrene 2.72 ppm vs USCO of 0.5 ppm, copper 330 ppm vs USCO of 50 ppm, lead 1,530 ppm vs USCO of 63 ppm, manganese 1,670 ppm vs USCO of 1,600, mercury 3.33 ppm vs USCO of 0.18 ppm, nickel 33.8 ppm vs USCO of 30 ppm, zinc 960 ppm vs USCO of 109 ppm. There was a minimal USCO exceedance for manganese and thus manganese is not a contaminant of concern at this site. Acetone and methylene chloride were detected at a concentration above USCO in one sample. However, acetone and methylene chloride are common laboratory artifacts, and they are not considered contaminants of concern at this site.

Pesticides, cyanide, and PCBs and 1,4-dioxane were non-detect in all soil samples. PFOA, PFOS, and other PFAS compounds were detected in on-site soils but were all below their unrestricted use guidance values and thus are not considered contaminants of concern for this site. Soil contamination is not expected to migrate off-site.

Groundwater - A total of 3 groundwater wells were installed in overburden groundwater and analyzed for VOCs, SVOCs, PCBs, pesticides, metals and cyanide as well as the emerging

contaminants PFAS and 1,4-dioxane. The metals manganese and sodium were detected in at least one groundwater sample in exceedance of groundwater standards. However, these metals are naturally occurring and/or typically related to road salt application and are therefore not considered contaminants of concern at this site. VOCs, SVOCs, PCBs, pesticides, cyanide, and 1,4-dioxane were non-detect or below standards. While lead was detected in groundwater (unfiltered sample) in the 2013 Phase 2 investigation, it was not detected in filtered or unfiltered groundwater samples during the Remedial Investigation and is therefore not considered a contaminant of concern in groundwater.

For per- and polyfluoroalkyl substances (PFAS), perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) were reported in the most upgradient monitoring well at concentrations of 30.2 and 10.8 parts per trillion (ppt), respectively, exceeding the 10 ppt screening levels for groundwater for each. Perfluorobutanesulfonic acid (PFBS) was detected in the same well at 1,600 ppt exceeding the 100 ppt screening level. These data indicate that the site is not a source of PFAS to groundwater. PFAS was not detected in other wells on the site, though over time, the PFAS-contaminated groundwater flowing onto the site has the potential of migrating off-site.

Soil Vapor - A total of 4 sub-slab soil vapor and 4 co-located indoor air samples and 2 additional soil vapor samples were collected from locations throughout the site. Low levels of the chlorinated solvents 1,1,1-trichloroethane with a maximum detection of 0.475 micrograms per cubic meter (ug/m^3), tetrachloroethene with a maximum detection of 0.542 ug/m^3, carbon tetrachloride with a maximum detection of 0.61 ug/m^3, and vinyl chloride with a maximum detection of 0.877 ug/m^3 were detected in on-site soil vapor and/or indoor air. Based on the 2006 Guidance for Evaluating Soil Vapor Intrusion in NYS, with updates, no further action is needed to address potential exposures via soil vapor intrusion in all cases. Off-site migration of soil vapor contamination is not a concern.

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.

People who dig below the ground surface may come into contact with contaminants in subsurface soil. Contaminated groundwater at the site is not used for drinking or other purposes and the site is served by a public water supply that obtains water from a different source not affected by this contamination. Volatile organic compounds in the groundwater may move into the soil vapor (air spaces within the soil), which in turn may move into overlying 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. Environmental sampling indicates soil vapor intrusion is not a concern for on-site or off-site locations.

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.

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

- Restore ground water aquifer to pre-disposal/pre-release conditions, to the extent practicable.
- Remove the source of ground 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 contamination.

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 Site Cover remedy.

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 remedial design program will include:

- 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.

Track 1 Area (outside of the Former Wallace Department Store building footprint):

2. Excavation

The existing on-site buildings overlaying contaminated soils will be demolished, except for the historic Wallace Department Store, and materials which can't be beneficially reused on site will be taken off-site for proper disposal in order to implement the remedy.

Excavation and off-site disposal of all on-site soils which exceed Unrestricted Soil Cleanup Objectives (USCOs), as defined by 6 NYCRR Part 375-6.8 except for those beneath the structural footprint of the historic Wallace Department Store. Approximately 7,000 cubic yards of contaminated soil will be removed from this portion of the site. Post-excavation samples will be collected to demonstrate whether USCOs have been achieved. Water removed from subsurface soils to allow for excavation will be properly managed prior to disposal.

3. Backfill

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 designated grades at the site.

While there are no site-related contaminants in the groundwater, use of groundwater as a source of potable or process water is restricted without the required permits and necessary water quality treatment as determined by NYSDOH or County DOH (Dutchess County, Sanitary Code 16.4).

Remainder of site - Area Beneath the Former Wallace Department Store (Track 4)

4. Site Cover

The existing former Wallace Department Store structure will remain and be maintained to allow for restricted residential use of the site. Should the existing building be removed in the future, a site cover shall be placed in this area or material removed such that a site cover would not be

required. The site cover may include paved surface parking areas, sidewalks or soil where the upper two feet of exposed surface soil meets the applicable soil cleanup objectives (SCOs) for restricted residential use. Any fill material brought to the site will meet the requirements for the identified site use as set forth in 6NYCRR part 375-6.7(d).

5. 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. This portion of the site remedy will achieve a Track 4 restricted-residential cleanup at a minimum. If the remedy achieves Track 4 in this area (i.e., if soil greater than two feet but less than 15 feet deep does not meet the restricted residential SCOs), the remedy will include imposition of a site cover. See element 4 above.

5a. 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 this portion of the controlled property for restricted residential, commercial, or industrial uses 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 the required permits and necessary water quality treatment as determined by the NYSDOH or County DOH (Dutchess County Sanitary Code, Section 16.4); and,
- require compliance with the Department approved Site Management Plan.

5b. Site Management Plan

ii. 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 Element 5a above.

Engineering Controls: The cover system discussed in Element 4 above.

This SMP 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 that should a building foundation or building slab be removed in the future, a cover system consistent with that described in Element 4 above will be placed in any areas where the upper two feet of exposed surface soil exceed the applicable soil cleanup objectives (SCOs), or alternatively soil can be removed such that a site cover is not needed;
- 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.

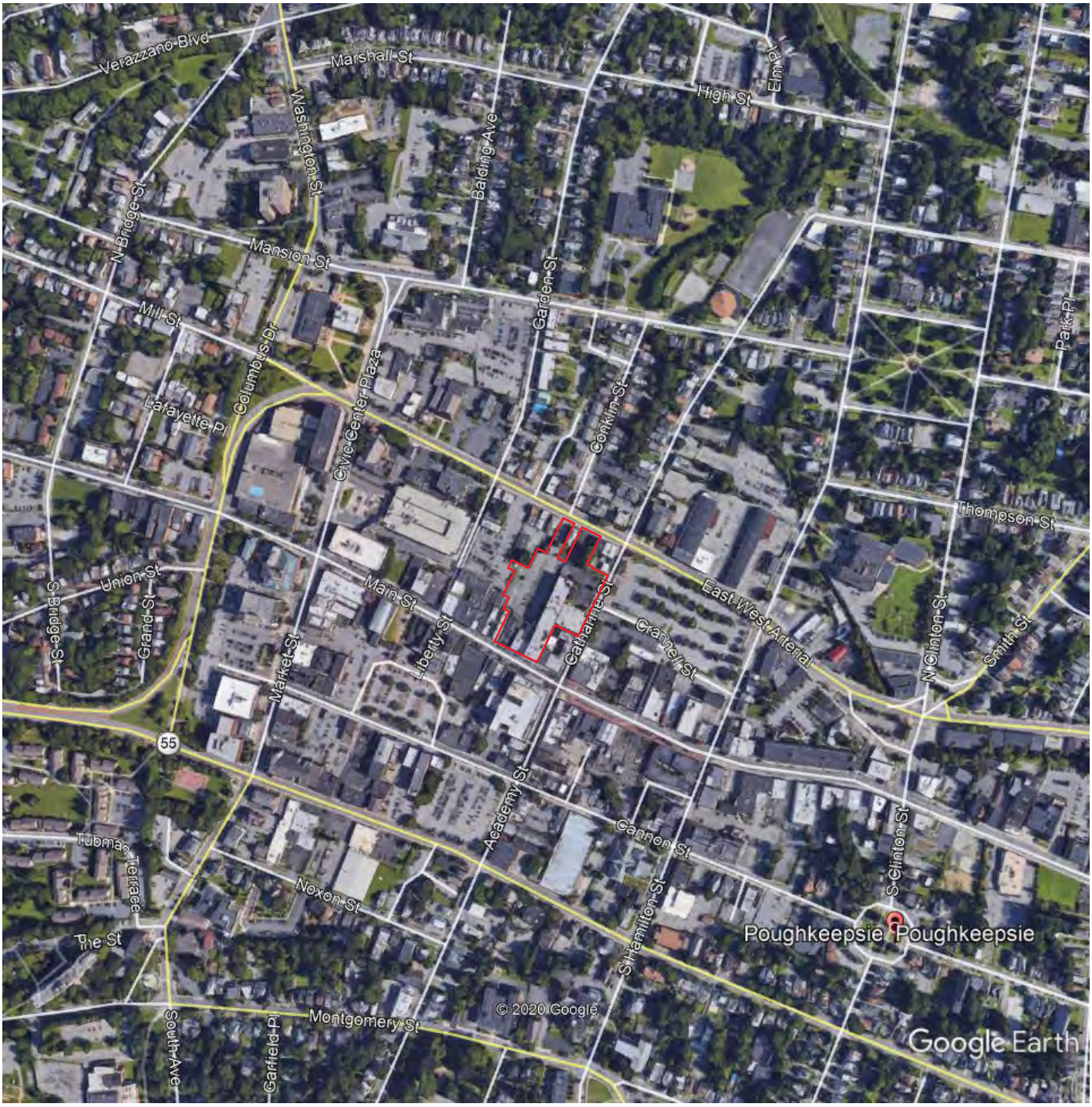


Figure 1: Site Location Map

Wallace Campus BCP Site C314134
319, 325, 327-329 and 331 Main Street
City of Poughkeepsie
Dutchess County, New York

Legend:

BCP Boundary/
Property Boundary

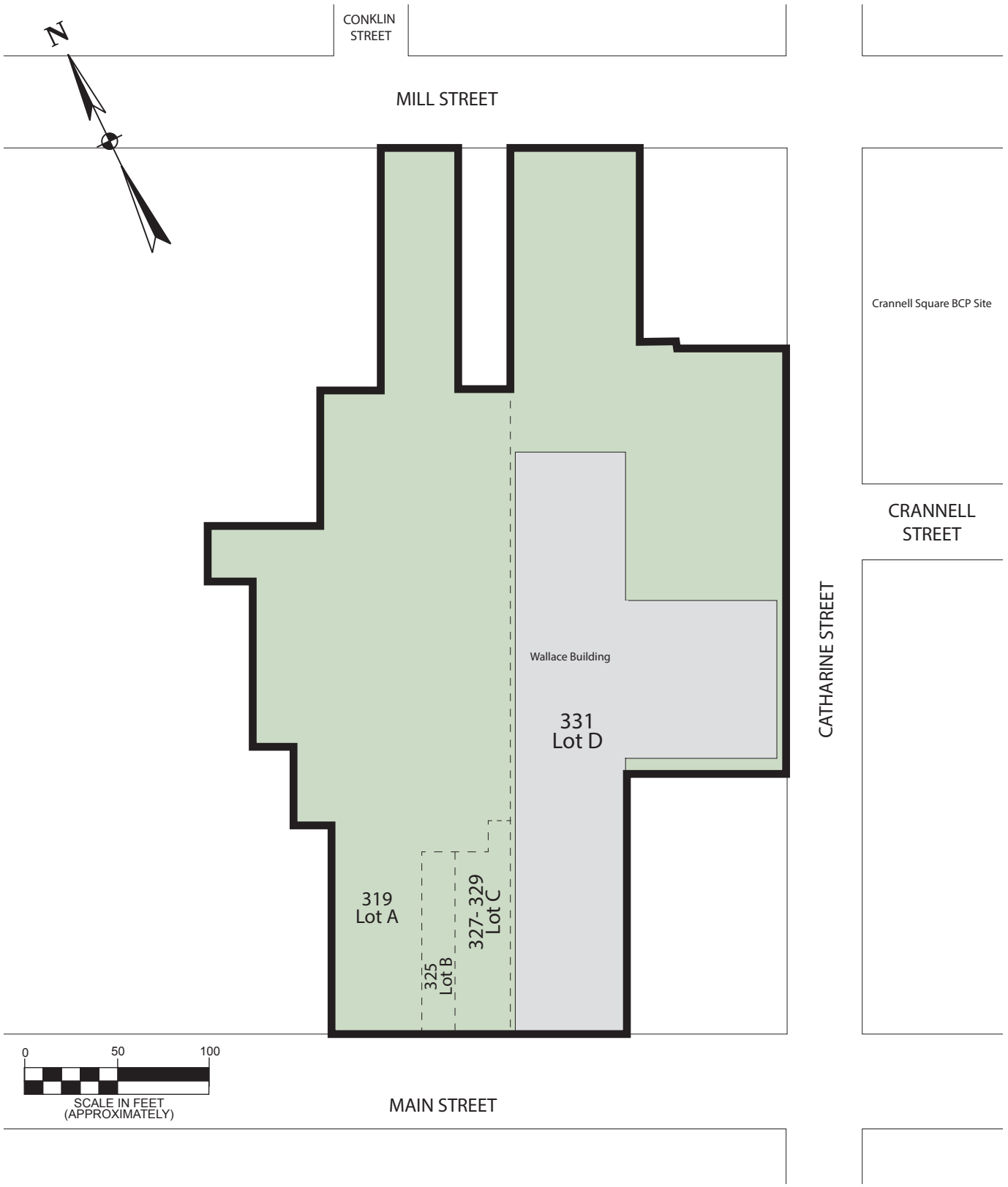
N

File No: 20-0213

August 2022

Figures

GALLAGHER BASSETT | TECHNICAL SERVICES



All feature locations are approximate. This map is intended as a schematic to be used in conjunction with the associated report, and it should not be relied upon as a survey for planning or other activities.

Figure 2: Remediation Figure

Wallace Campus BCP Site C314134
319, 325, 327-329 and 331 Main Street
City of Poughkeepsie
Dutchess County, New York

Legend:
- subject property border
- lot line
- Building to remain (Track 4 clean up area)
- Track 1 cleanup area - no Engineering Controls

File: 20-0213
August 2022
Scale as shown
Figures