DECISION DOCUMENT

130 Midland Avenue
Brownfield Cleanup Program
Port Chester, Westchester County
Site No. C360195
June 2023

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

DECLARATION STATEMENT - DECISION DOCUMENT

130 Midland Avenue
Brownfield Cleanup Program
Port Chester, Westchester County
Site No. C360195
June 2023

Statement of Purpose and Basis

This document presents the remedy for the 130 Midland Avenue 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 130 Midland Avenue 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. Green Remediation
Green remediation principals and techniques will be implemented to the extent feasible in the 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 gas 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; 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 shall be constructed, at a minimum, to meet the 2020 Energy Conservation Construction Code of New York (or most recent edition) to improve energy efficiency as an element of construction.

As part of the site management program, to promote implementation of green and sustainable remediation principles, an environmental footprint analysis will be completed. The environmental

footprint analysis will be completed using an accepted environmental footprint analysis calculator such as SEFA (Spreadsheets for Environmental Footprint Analysis, USEPA), SiteWiseTM (available in the Sustainable Remediation Forum [SURF] library) or similar Department accepted tool. Water consumption, greenhouse gas emissions, renewable and non-renewable energy use, waste reduction and material use will be estimated, and goals for the project related to these green and sustainable remediation metrics, as well as for minimizing community impacts, protecting habitats and natural and cultural resources, and promoting environmental justice, will be established for the site management activities, as appropriate. Further, progress with respect to green and sustainable remediation metrics will be tracked, and reported in periodic reports, as part of the site management program, and opportunities to further reduce the environmental footprint of the project will be identified as appropriate.

Additionally, the site management program will include an evaluation of the impact of climate change on the project site and the engineering controls. Potential vulnerabilities associated with extreme weather events (e.g., hurricanes, lightning, heat stress and drought), flooding, and sea level rise will be identified, and the site management program will include measures to minimize the impact of potential identified vulnerabilities.

2. Site Cover

A site cover currently exists in areas not occupied by buildings and will be maintained to allow for commercial use of the site. Any site redevelopment will maintain the existing site cover. The site cover may include paved surface parking areas, sidewalks or soil where the upper one foot of exposed surface soil meets the applicable soil cleanup objectives (SCOs) for commercial 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). In areas where utilities will be installed for redevelopment, one foot of clean soil will be placed above utility excavations with a demarcation layer placed over top, before a hardscape site cover (asphalt) is installed.

3. Monitored Natural Attenuation

Groundwater contamination will be addressed with monitored natural attenuation (MNA). Groundwater will be monitored for site-related contamination and also for MNA indicators which will provide an understanding of the biological activity breaking down the contamination. It is anticipated that contamination will decrease by an order of magnitude in a reasonable period of time. Reports of the attenuation will be provided until contamination has decreased below groundwater standards and guidance values or is asymptotic at levels acceptable to the Department. Active remediation will be proposed if it appears that natural processes alone will not address the contamination. The contingency remedial action will depend on the information collected, but it is currently anticipated to be in-situ liquid activated carbon.

4. Vapor Mitigation

Any on-site buildings will be required to have a sub-slab depressurization system, or other acceptable measures, to mitigate the migration of vapors into the building from the subsurface.

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. The remedy will achieve a Track 4 commercial cleanup at a minimum. 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 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 County DOH; and
- require compliance with the Department approved Site Management Plan.

6. 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 Paragraph 5 above.

   Engineering Controls: The soil cover discussed in Paragraph 2 and the sub-slab depressurization system discussed in Paragraph 4 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 further investigation and remediation should large scale redevelopment occur, if any of the existing structures are demolished, or if the subsurface is otherwise made accessible;
   - descriptions of the provisions of the environmental easement including any land use, and/or groundwater use restrictions;
   - a provision for evaluation of the potential for soil vapor intrusion for any occupied buildings on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
   - a provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in Paragraph 2 above will be placed in any areas where the upper one foot of exposed surface soil exceeds 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 and/or indoor air to assess the performance and effectiveness of the remedy;
    - a schedule of monitoring and frequency of submittals to the Department.

3. An Operation and Maintenance (O&M) Plan to ensure continued operation, maintenance, inspection and reporting of any mechanical or physical components of the active vapor mitigation system(s). The plan includes, but it not limited to:
    - Procedures for operating and maintaining the system(s) and
    - Compliance inspection of the system(s) to ensure proper O&M as well as providing the data for any necessary reporting.

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.

June 29, 20023
Date

R. Scott Deyette
Scott Deyette, Bureau Director
Remedial Bureau C

DECISION DOCUMENT

130 Midland Avenue
Port Chester, Westchester County
Site No. C360195
June 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://gisservices.dec.ny.gov/gis/dil/index.html?rs=C360195

Port Chester - Rye Brook Public Library
Attention: Stacey Harris
1 Haseco Avenue
Port Chester, NY 10573
Phone: (914) 939-6710

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 130 Midland Avenue site is a 6.23-acre property located at 130 Midland Avenue, Port Chester, NY. Actual property addresses at the site span from 122 to 130 Midland Avenue. The site is surrounded by commercial use to the west and south and residential land use to the east and a transportation right-of-way to the north.

Site Features: The site features include one 80,000 square foot building which is currently under construction, and an asphalt paved parking lot occupying all other portions of the site.

Current Zoning and Land Use: The site is currently zoned commercial C1 for neighborhood retail use. The surrounding parcels to the south and west are used for commercial use; surrounding parcels to the east are used for a combination of commercial and residential uses; and surrounding parcels to the north are used for manufacturing and industrial uses and properties to the north are separated from the site by a Metro-North Railroad right of way. The nearest residential area is directly to the east, at 2 Weber Drive.

Past Use of the Site: The subject property was initially developed prior to 1908, with two residential dwellings and a large industrial building containing a car barn, boiler room, and power plant. The property was operated as the New York and Stamford Railway Company. An additional industrial building was constructed between 1908 and 1915 and utilized as a railroad car barn and paint shop. The boiler room in the building was converted to an electrical substation. Railroad spurs onto the subject property were added by 1919. By 1934, the property was being utilized for bus storage and repair for the County Transportation System. By 1950, the property was utilized as a nut and bolt manufacturing facility, as well as for automotive storage. In addition to these building uses, exterior unpaved areas were utilized for equipment and machinery storage until sometime between 1971 and 1974, when all structures on the property were demolished and the property became vacant land. A 60,000 square-foot building was constructed in 1983 and was demolished in 2022. Previous tenants of the building include a grocery store, restaurants, liquor store, dry cleaner, and a card and gift shop. Currently, an 80,000 square-foot building is under construction in the footprint of the prior building.

Site Geology and Hydrogeology: The subject property is located at an average elevation of 15 feet above mean sea level in a topographically low area of the neighborhood. The overburden is composed predominantly of sand, silt, and gravel. Groundwater was encountered at depths ranging

from 6 to 13 feet below grade. Groundwater flows to the east-southeast. Bedrock appears to be Hartland Schist. Bedrock was encountered 20-30 feet below ground surface, and the bedrock surface dips to the northwest.

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 commercial use (which allows for 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 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 or indoor air 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
- sub-slab 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 are:

copper	trichloroethene (TCE)
cadmium	1,2,4-trimethylbenzene
benzo(a)anthracene	1,2,4,5-Tetramethylbenzenenaphthalene
benzo(a)pyrene	xylene
benzo(b)fluoranthene	perfluorooctanoic acid (PFOA)
tetrachloroethene (PCE)	perfluorooctane sulfonate (PFOS)

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.

The following IRM has been completed at this site based on conditions observed during the RI.

Soil Excavation:

The Interim Remedial Measure (IRM) activities addressed the soil impacts within the upper 4 feet of the proposed building footprint at the Site. The IRM consisted of demolition of the existing building as part of site preparation, excavation of 4 feet of soil beneath the proposed building footprint for remedial purposes and additional excavation areas for redevelopment/construction purposes. Soil excavation was divided into 18 grids approximately 5,000 square feet in size. Post-excavation samples indicated exceedances of commercial SCOs in ten of eighteen samples. Soil samples exceeded commercial SCOs for benzo(a)pyrene in nine samples ranging from 1.2 to 3.1 ppm compared to the CSCO of 1 ppm; barium in two samples ranging from 501 to 609 ppm compared to the CSCO of 400 ppm; cadmium at 13.6 ppm compared to the CSCO of 9.3 ppm; and Aroclor 1254 at 4.2 ppm compared to the CSCO of 1 ppm. Further excavation for development proceeded after the excavation was completed. To ensure proper handling and disposal of excavated material, waste characterization sampling was completed for all site material for the purposes of off-site disposal in a manner suitable to receiving facilities and in conformance with applicable federal, state and local laws, rules, and regulations and facility-specific permits.

Building demolition debris was staged, and 66 cubic yards of asphalt and 762 cubic yards of concrete were disposed off-site. The IRM excavation removed over 13,350 cubic yards of soil that were disposed of off-site. The excavation was backfilled with an approved crushed stone.

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.

Nature and Extent of Contamination:
Soil and groundwater were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, polychlorinated biphenyls (PCBs), per- and polyfluoroalkyl substances (PFAS), and pesticides. Soil vapor was analyzed for VOCs. Based upon investigations conducted to date, the primary contaminants of concern include SVOCs and metals in soil, VOCs in soil vapor, and VOCs and PFAS in groundwater.

Soil: 50 total soil samples were taken during the remedial investigation between 2019 and 2022. The most common exceedance in soil is for the semi-volatile organic compound (SVOC) benzo(a)pyrene. The maximum concentration of benzo(a)pyrene was at 8.4 parts per million (ppm) compared to the commercial soil cleanup objective (CSCO) of 1 ppm. Benzo(a)pyrene was detected in 15 of 50 soil samples at a maximum depth of 6-8 feet below ground surface. Benzo(a)anthracene and benzo(b)fluoranthene were also identified exceeding CSCOs in soil. Metals including copper and cadmium were identified exceeding CSCOs. Copper was found at a maximum of 970 ppm compared to the standard of 270 ppm, and cadmium was detected at 21 ppm compared to the standard of 9 ppm.

Volatile organic compounds (VOCs), pesticides, polychlorinated biphenyls (PCBs) and perfluorooctanoic acid (PFOA) were identified below CSCOs.

Soil impacts are not likely to migrate off-site.

Groundwater: Eight overburden monitoring wells, seven temporary "interface wells" (straddling the groundwater table) and three bedrock monitoring wells were installed during the remedial investigation. Nine VOCs were identified exceeding groundwater standards. 1,2,4-trimethylbenzene was detected at a maximum of 16 part per billion (ppb) compared to the groundwater standard of 5 ppb. Naphthalene was detected at a maximum 56 ppb compared to groundwater standard of 10 ppb and Xylene was detected at a maximum of 37 ppb compared to the groundwater standard of 5 ppb. VOC exceedances where primarily localized to the interface wells.

Per-and polyfluoroalkyl substances (PFAS) were detected in six of nine samples.
PFOA was detected at a maximum of 31.1 part per trillion (ppt) compared to the groundwater standard of 6.7 ppt. Perfluorooctane sulfonate (PFOS) was detected at a maximum of 60.8 ppt compared to the groundwater standard of 2.7 ppt. Elevated concentrations of PFAS in groundwater where not found to be associated with an on-site source. Groundwater exceedances for PFAS were identified at the upgradient site boundary.

Groundwater was sampled along the down gradient property boundaries and indicates that contamination is not likely to migrate off-site.

Soil Vapor: Four sub-slab soil vapor samples were taken in the former 60,000 square-foot commercial building in the former dry-cleaning storefront. Tetrachloroethene (PCE) was detected between 9,900 micrograms per cubic meter (ug/m3) and 1,190 ug/m3. Sub-slab vapor for PCE would require mitigation based on the DOH Soil Vapor Matrix. No indoor or outdoor air samples were collected. Trichloroethene (TCE) was detected between 98.9 ug/m3 and 17.5 ug/m3, Dichlorodifluoromethane was detected between 19 ug/m3 and 62 ug/m3 and cis-1,2-Dichloroehtylene was detected between 199 ug/m3 and 1 ug/m3 in the former dry cleaning storefront. Three sub -slab soil vapor samples were collected from the other tenant spaces of the building. PCE was detected between 19 ug/m3 and 5 ug/m3, Dichlorodifluoromethane was detected between 2,080 ug/m3 and 21 ug/m3, Freon 11 was detected between 167 ug/m3 and 21 ug/m3, and Benzene was detected between 70 ug/m3 and 20 ug/m3 in the other tenanted spaces. Three soil vapor samples were taken downgradient of the dry cleaner storefront outside of the building footprint. PCE was detected in one soil vapor sample at 17 ug/m3, TCE was detected in one soil vapor sample at 3 ug/m3. Environmental sampling indicates soil vapor intrusion is not a concern for off-site buildings.

6.4: Summary of Human Exposure Pathways

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

The site is fenced and most of the site is covered by asphalt. People will not come in contact with site-related soil and groundwater contamination unless they dig below the ground surface. 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. Because the on-site building has been demolished, inhalation of site contaminants in indoor air due to soil vapor intrusion does not represent a concern in its current condition. However, the potential exists for the inhalation of site contaminants due to soil vapor intrusion for any future on-site development. Environmental sampling indicates soil vapor intrusion is not a concern for off-site buildings.

6.5: Summary of the Remediation Objectives

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

The remedial action objectives for this site are:

Groundwater

RAOs for Public Health Protection

- Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards.
- 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 or surface water contamination.

Soil

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.
- Prevent impacts to biota from ingestion/direct contact with soil causing toxicity or impacts from bioaccumulation through the terrestrial food chain.

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 4: Restricted use with site-specific soil cleanup objectives remedy.

The selected remedy is referred to as the Site Cover, Vapor Mitigation and Monitoring site remedy.

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

1. Green Remediation

Green remediation principals and techniques will be implemented to the extent feasible in the 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 gas 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; and
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of the project will be identified as appropriate.

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- a provision for further investigation and remediation should large scale redevelopment occur, if any of the existing structures are demolished, or if the subsurface is otherwise made accessible;
- descriptions of the provisions of the environmental easement including any land use, and/or 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 Paragraph 2 above will be placed in any areas where the upper one foot of exposed surface soil exceeds 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
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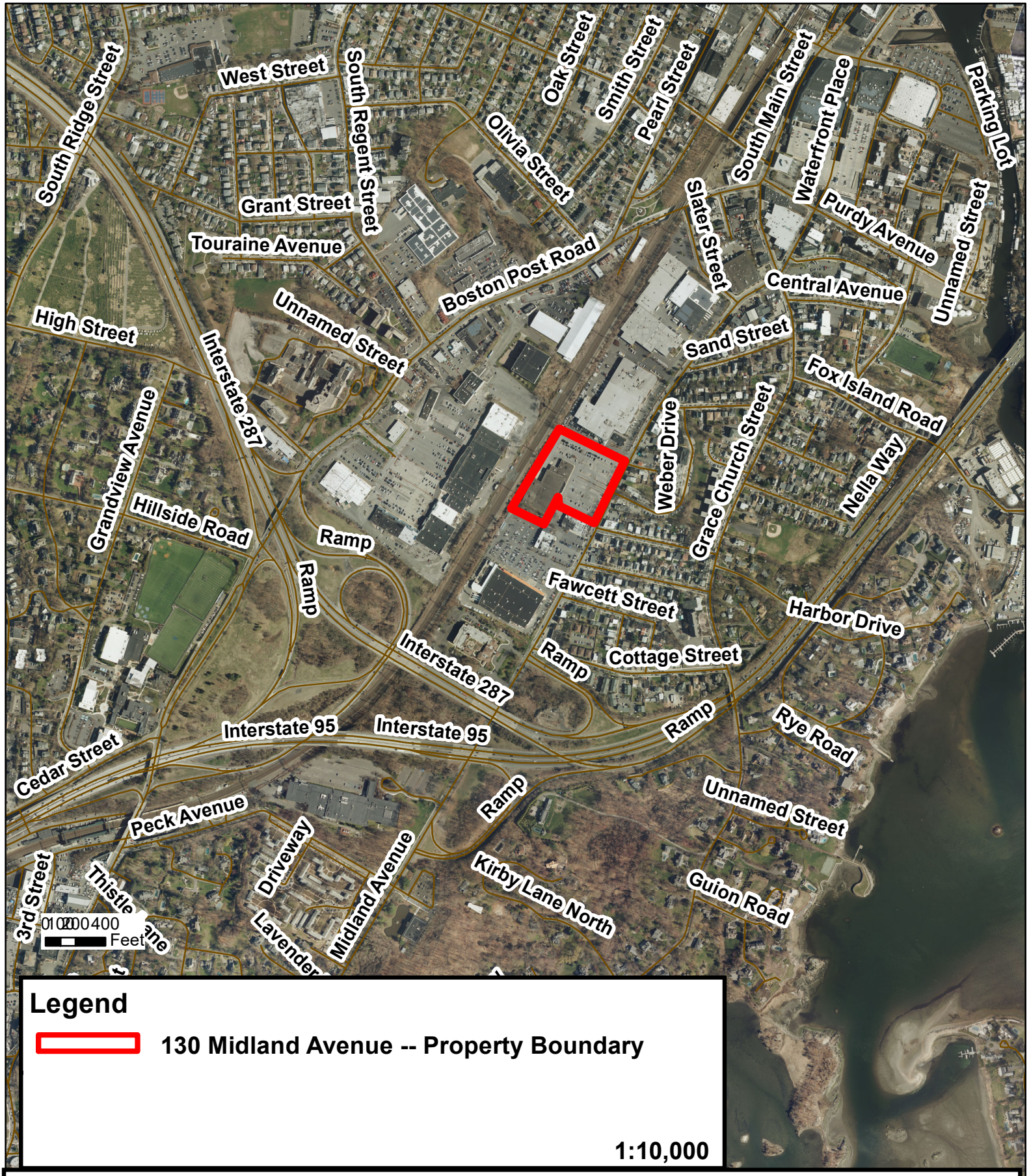
2. A Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:
    - monitoring of groundwater and/or indoor air to assess the performance and effectiveness of the remedy;
    - a schedule of monitoring and frequency of submittals to the Department.

3. An Operation and Maintenance (O&M) Plan to ensure continued operation, maintenance, inspection and reporting of any mechanical or physical components of the active vapor mitigation system(s). The plan includes, but it not limited
    - Procedures for operating and maintaining the system(s) and

- Compliance inspection of the system(s) to ensure proper O&M as well as providing the data for any necessary reporting.



Legend

130 Midland Avenue -- Property Boundary

1:10,000

NEW YORK STATE | Department of Environmental Conservation

Figure 1
BCP Site Location and Parcel Boundary
130 Midland Avenue
Port Chester, NY 10573

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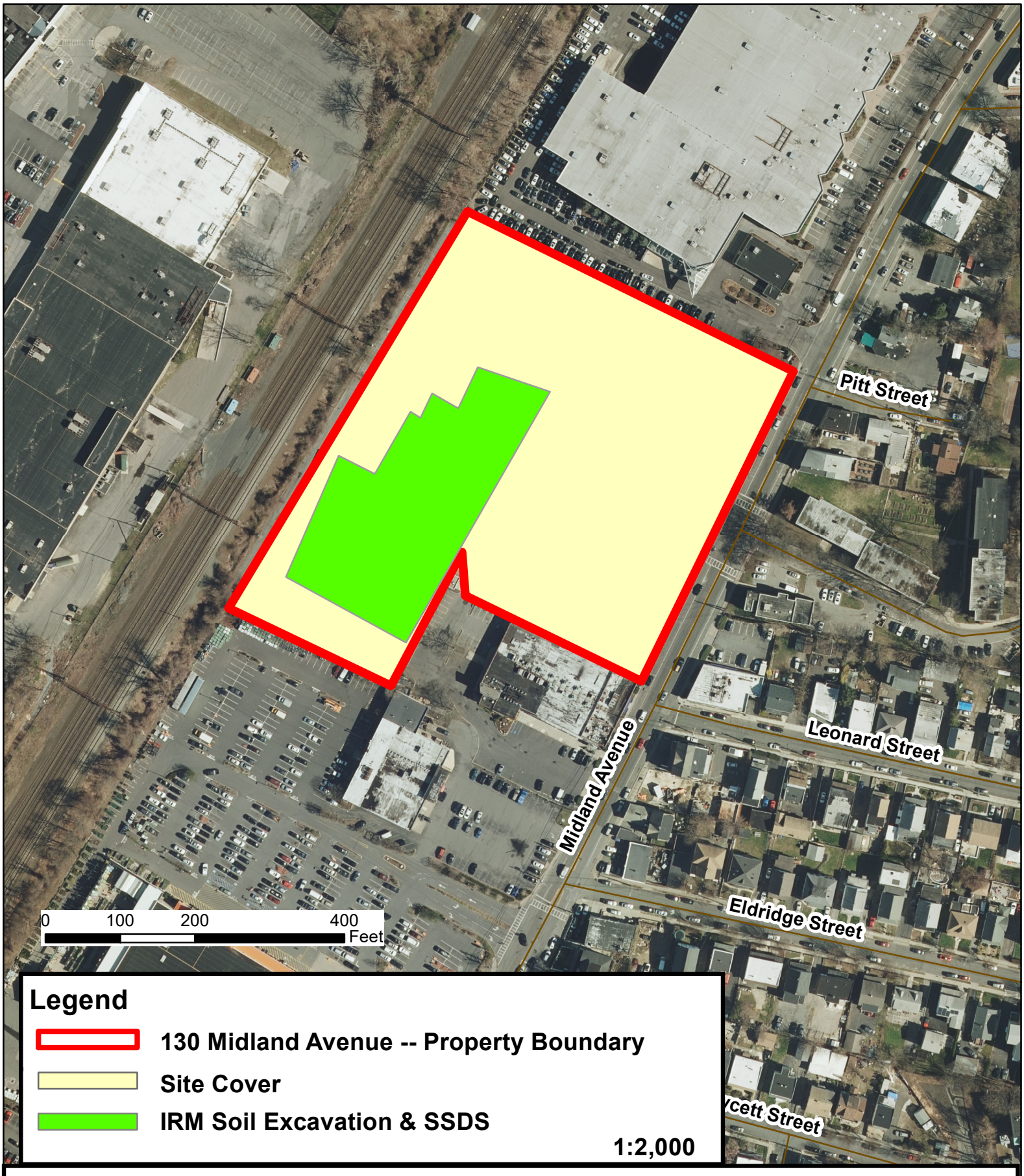

NEW YORK STATE Department of Environmental Conservation

Figure 2
Elements of Remedy
130 Midland Avenue
Port Chester, NY 10573

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