

MIKE SPANO
MAYOR

PAUL SUMMERFIELD, P.E.
CITY ENGINEER



40 SOUTH BROADWAY
CITY HALL – ROOM 315
YONKERS, NEW YORK 10701
(914) 377-6210
FAX (914) 377-6215

CITY OF YONKERS
DEPARTMENT OF ENGINEERING

March 19, 2018

VIA E-MAIL

Matthew Hubicki – Project Manager
New York State DEC
Division of Environmental Remediation, BURC
625 Broadway
Albany, New York 12233-7014

**Re: 1061 North Broadway – City of Yonkers
Site Number V00687
Site Management Periodic Review Report & IC/EC Certification
October 24, 2016 – February 24, 2018**

Dear Mr. Hubicki:

As per the letter from the NYSDEC dated January 11, 2018 regarding the above referenced site, attached please find the City of Yonkers Periodic Review Report 1 for your review, comment and/or approval.

Please feel free to call me at (914) 377-6210 with any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "P. Summerfield", with a large, stylized flourish at the end.

Paul N. Summerfield, P.E.
City Engineer

cc: Michael Lepre, P.E. – City of Yonkers

SITE MANAGEMENT PERIODIC REVIEW REPORT 1

(October 24, 2016 through February 24, 2018)

1061 (1060) NORTH BROADWAY, YONKERS, NEW YORK 10701

NYS DEC SITE NUMBER V00687

I. EXECUTIVE SUMMARY:

A. Summary of Site; Nature and Extent of Contamination; Remedial History.

The site is located in the City of Yonkers, County of Westchester, New York; is approximately 7.708-acres in area; and bounded by the Foxfire School to the north, Odell Avenue to the south and west and North Broadway to the east.

The pre-existing site included a visible main fill area with a total volume of fill estimated to be about 17,700 cubic yards, with a thickness of approximately 5 feet. The fill was brought to the site around the year 1990 for leveling purposes.

The Remedial Investigation determined that elevated concentrations) of benzo(a)pyrene and six (6) other polycyclic aromatic hydrocarbons (PAH's) were detected in the on-site fill materials. Additionally, elevated concentrations of copper, lead, mercury and zinc were also detected in isolated locations.

The site was remediated in accordance with the remedy selected by the NYSDEC in the Decision Document dated March 20, 2008, as well as in accordance with the following documents: Remedial Action Work Plan (RAWP) dated October 29, 2004-Revised March 24, 2005; Remedial Closure Work Plan (RCWP) dated November 28, 2007 and approved by the NYSDEC March 20, 2008; and the Final Design Specifications and Plans (RD) dated December 10, 2010, approved by NYSDEC and utilized for the project.

Relatively flat areas of the fill pile were spread out and re-graded, covered with a minimum of one foot of clean soil, and vegetative cover established. Steep western slopes of the site were covered with crushed rock. Fencing and signage was installed to prevent public access. A property deed restriction was executed and recorded, restricting land use to passive open space. A Site Management Plan was implemented for long term management of remaining contamination as required by the Deed Restriction, including institutional/engineering controls, monitoring & reporting. Remedial activities were completed at the site in November 2011. The Site FER and SMP were approved by the NYSDEC October 24, 2016.

B. Effectiveness of the Remedial Program.

1. Progress made during the reporting period toward meeting the remedial objectives for the site.

The current IC/EC evaluation, based on actual site inspections, indicates that the implemented remedy is thus far achieving site remedial goals.

2. The ultimate ability of the remedial program to achieve the remedial objectives for the site.

Based on the record of observations to date, it appears that the remedial program in place will continue to achieve the remedial objectives for the site.

C. Compliance.

1. Identify any areas of non-compliance.

No areas of non-compliance have been noted in either the Institutional/Engineering Control Plan or the Monitoring Plan for the site.

2. Plan for correction of areas of non-compliance.

As remedial goals are being achieved, there are no corrections scheduled.

D. Recommendations.

1. No changes are recommended to the SMP.

2. No changes are recommended to the submittal frequency of PRR's.

3. The City of Yonkers does not request any site management discontinuance at this time.

II. SITE OVERVIEW:

A. Site Characteristics and Extent of Contamination Prior to Remediation.

The site is located in the City of Yonkers, County of Westchester, New York and is identified as a portion of Block 3515, Lot 115 on the City of Yonkers Tax Map Section 3. The site area is 7.708-acres and bounded by the Foxfire School to the north; Odell Avenue to the south/west; & North Broadway to the east (Figure 1).

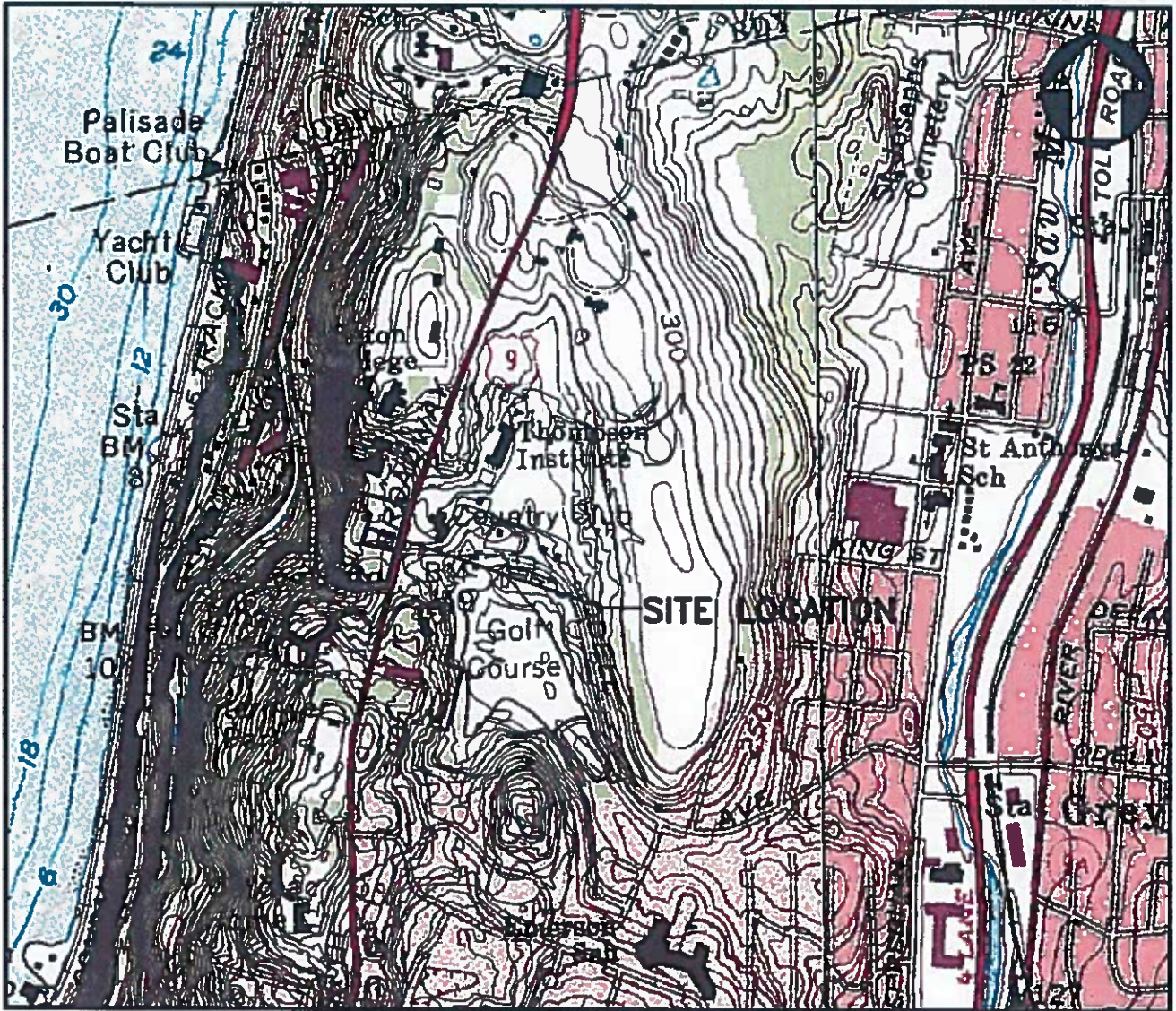
The pre-existing site included an obvious and visible main fill area that bordered the existing parking lot on the west and southwest, as well as an unpaved area south of the existing parking lot. The total volume of fill at the site, overlying pre-existing conditions, was estimated to be about 17,700 cubic yards, with a thickness of approximately 5 feet. According to available information, the fill was brought to the site around the year 1990 for leveling purposes.

The Remedial Investigation determined that elevated concentrations (in excess of the corresponding recommended soil cleanup objectives in NYSDEC Part 375 Table 6.8b Commercial Use Restriction) of benzo(a)pyrene and six (6) other polycyclic aromatic hydrocarbons (PAH's) were detected in the on-site fill materials. Additionally, elevated concentrations of copper, lead, mercury and zinc were detected in isolated locations within the fill materials.

B. Remedial Program Chronology and Components.

The site was remediated in accordance with the remedy selected by the NYSDEC in the Decision Document dated March 20, 2008, as well as in accordance with the following documents: Remedial Action Work Plan (RAWP) dated October 29, 2004-Revised March 24, 2005; Remedial Closure Work Plan (RCWP) dated November 28, 2007 and approved by the NYSDEC March 20, 2008; and the Final Design Specifications and Plans (RD) dated December 10, 2010, approved by NYSDEC and utilized for the project.

Relatively flat areas of the above-grade fill pile were spread out and re-graded as per the construction documents to maintain proper drainage, covered with a minimum of one foot of clean soil and vegetative cover was established. Steep western slopes of the site were covered with crushed rock. Fencing and signage was installed to prevent public access to the steep western slopes. A property deed restriction was executed and recorded, restricting land use to passive open space, and a Site Management Plan was implemented for long term management of remaining contamination as required by the Deed Restriction. This includes institutional/engineering controls, monitoring & reporting. Remedial activities were completed at the site in November 2011. The site FER and SMP were approved by the NYSDEC October 24, 2016.



APPROX. SCALE: 1"=2000'

FIGURE 1



SITE LOCATION
1061 NORTH BROADWAY, YONKERS, N.Y.

III. EVALUATE REMEDY PERFORMANCE, EFFECTIVENESS, PROTECTIVENESS:

A. Describe the effectiveness of the remedy achieving site remedial goals.

As the site contains contamination left after completion of the above described remedial actions, Engineering Controls have been incorporated into the site remedy to control exposure to remaining contamination and to ensure protection of public health and the environment. Additionally, a Deed Restriction approved by the NYSDEC has been recorded with the Westchester County Clerk, that requires compliance with the Site Management Plan and all EC's and IC's placed on the site. The IC's place restrictions on site use, and mandate operation, maintenance, monitoring and reporting measures for all EC's and IC's.

Based on the IC/EC evaluation noted in Section IV, the implemented remedy is thus far achieving site remedial goals.

IV. IC/EC COMPLIANCE REPORT:

A. IC/EC Requirements and Compliance.

1. Describe each control, its objective, and how performance of the control is evaluated.

a. Engineering Controls - Cover System:

- i. Shallow Sloped Area: The first component of the cover system to be monitored is the Indicator Layer, the layer of high density polyethylene located directly on top of the shallow sloped and re-graded, pre-existing contaminated material. The indicator material is bright orange in color, and provides a physical warning to anyone that may inadvertently perform excavation activity at the site in the future. The entire area of the cap is visually inspected by personnel on foot to ensure that no portion of the indicator layer has become visible and exposed to the air. If the indicator layer becomes visible, repair of the cap material shall take place immediately, to ensure that the minimum depth of cover material of 12-inches is re-established to ensure the integrity of the indicator layer. Photographs shall be taken of both pre and post repair conditions.

The second component of the cover system to be monitored is the 12" thick clean soil layer. This material is composed of a minimum 8" thick layer of clean soil material, and a 4" thick layer of topsoil that sustains vegetative cover on the site. The entire soil cap will be visually inspected by personnel on foot to ensure that both components of the 12" thick layer remain intact, with respect to as-built conditions being used as a standard baseline.

If the 12-inch thick clean soil layer is found to be eroded, repair of the individual cap materials shall take place immediately, to ensure that the minimum depth of cover material is re-established to ensure the integrity of the cap system. Photographs shall be taken of both pre and post repair conditions.

The third component of the cover system to be monitored is the finished surface of the cap system, which consists of grass and wild flower vegetation covering virtually all areas of the site that contain granular surface material. The surface of the cap is visually inspected by personnel on foot to ensure that vegetation continues to cover the entire shallow-sloped granular surface of the cap.

If the vegetation of the surface cover is found to be lacking or in poor condition, re-establishment of the vegetative cover in that area shall be

performed immediately, to ensure that adequate cover material is in place to maintain the integrity of the cap system and proper erosion control. Photographs shall be taken of both pre and post repair conditions.

- ii. **Steeply Sloped Area:** Similar to the shallow sloped area, the first component of the cover system to be monitored is the Indicator Layer, the layer of high density polyethylene located directly on top of the steeply sloped area of the site. The indicator material is bright orange in color, and provides a physical warning to anyone that may inadvertently perform excavation activity at the site in the future. The entire steeply sloped area of the cap is visually inspected by personnel on foot to ensure that no portion of the indicator layer has become visible and exposed to the air. If the indicator layer becomes visible, repair of the crushed rock side slope surface material shall take place immediately, to ensure that the minimum depth of cover material of 12-inches is re-established to ensure the integrity of the indicator layer. Photographs shall be taken of both pre and post repair conditions.

The capping system for the steeply sloped western area of the site was permanently stabilized with a crushed rock material, covering approximately 0.85 acres of the slope. This material was designed to remain stable, and should require little, if any, future maintenance. The crushed rock surface of the steep side-slope is visually inspected by personnel on foot to ensure that the rock and slope are intact.

If the crushed rock side-slope cover is found to be lacking or in poor condition, re-establishment of the rock slope in that area shall be performed immediately, to ensure that adequate cover material is in place to maintain the stability of the slope. Photographs shall be taken of both pre and post repair conditions.

b. Engineering Controls - Stormwater Management System:

- i. **Surface Drainage:** The surface drainage capability of the cover system is monitored by inspecting the surface of the ground to ensure that site grading conforms to the as-built record of site ground surface contours. Adequate ground surface drainage will ensure that the cover system will remain stable during rainfall events. During the inspection of other cap components, site grading and drainage are also visually inspected by personnel on foot, to ensure that site drainage is adequate and functioning properly.
- ii. **Off-site Systems:** Off-site drainage systems are monitored for proper function, and maintained as required. During the inspection of other

drainage components, off-site systems are also inspected to make sure they are functioning correctly.

If site grading and drainage systems are found to be lacking or in poor condition with respect to the as-built conditions, re-establishment of proper grades and drainage shall be performed immediately to ensure cap and slope stability. Photographs shall be taken of both pre and post repair conditions.

c. Engineering Controls - Site Security System:

- i. Security Fence: In order to prevent access to steeply sloped portions of the site, as well as to control public access to authorized site areas, a 6-foot high chain link fence was installed at portions of the site perimeter, augmenting existing site fencing and rock walls.

The fence perimeter is visually inspected by personnel on foot, to determine if the fence is stable, and if any portion has been damaged due to weather, tree falls, vandalism, etc. If damage is discovered, those affected portions of fence shall be immediately repaired in kind. Photographs shall be taken of both pre and post repair conditions.

- ii. No Trespassing Signs: The City installed eight (8) "No Trespassing" signs, at appropriate intervals along the site perimeter. Each "No Trespassing" sign will be inspected by personnel, to ensure that it is in good condition and visible. If signs are damaged or found missing, repairs and/or replacement shall take place immediately. In a fashion similar to other site systems, photographs shall be taken of both pre and post repair conditions.

- d. Institutional Controls: The site has a series of Institutional Controls in the form of site restrictions. Adherence to these Institutional Controls is required by the Deed Restriction that was approved for the site by the NYSDEC and was recorded with the Westchester County Clerk. Site restrictions that apply to the Controlled Property are:

- i. The property may only be used for commercial and/or passive recreational uses provided that the long-term Engineering and Institutional Controls included in the SMP are employed;
- ii. The property may not be used for a higher level of use, such as unrestricted residential use without additional remediation and amendment of the Deed Restriction, as approved by the NYSDEC;
- iii. All future activities on the property that disturb remaining contaminated material must be conducted in accordance with the SMP;
- iv. The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use.

2. Summarize the status of each control.

The latest formal Site Inspection occurred on August 23, 2017, and is included in Section V. This inspection noted the following conditions of the Engineering Controls:

- a. Cover System:
 - i. Shallow Sloped Areas:
 - Indicator Layer: ***Not exposed.***
 - Soil Cap - 8" Clean Fill: ***Full depth confirmed & stable.***
 - Soil Cap - 4" Top Soil: ***Full depth confirmed & stable.***
 - Vegetative Surface: ***100 % coverage – good condition.***
 - ii. Steep Side Slope Areas:
 - Indicator Layer: ***Layer not exposed.***
 - Boulder Surface Cover: ***Full depth confirmed & stable.***
- b. Stormwater Management System:
 - i. Surface Drainage: ***Grades conform to designs and as-builts.***
 - ii. Off-Site Systems: ***Functioning correctly.***
- c. Site Security System:
 - i. Security Fence: ***Grades are flush with base – no gaps.***
 - ii. No Trespassing Signs: ***Signs are intact.***

The latest formal Site Inspection on August 23, 2017 also included an evaluation of the following Institutional Controls:

- a. Restrictive Covenant: ***In Place.***
- b. Site Use - Conditions: ***Observations indicate a passive use.***

3. Corrective Measures: Describe steps proposed to address any deficiencies in the IC/EC's.

Based on the observations and evaluations made in the above referenced Inspection Report and as noted above, the Site Engineering and Institutional Controls are in place, performing properly and are effective. As such, no steps to address deficiencies in the IC/EC's are required.

4. Conclusions and recommendations for changes.

As the referenced Site Engineering and Institutional Controls have been observed and evaluated to be in place, performing properly and are effective, no changes are recommended at this time.

B. IC/EC Certification:

- 1. The certification is attached herewith.



Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



Site No. **V00687** Site Details Box 1

Site Name **Lot @ S. End of Elizabeth Seton Campus**

Site Address: **1061 North Broadway** Zip Code: **10701-**
 City/Town: **Yonkers**
 County: **Westchester**
 Site Acreage: **3.4**

Reporting Period: **October 24, 2016 to February 24, 2018**

- | | YES | NO |
|---|-------------------------------------|-------------------------------------|
| 1. Is the information above correct? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| If NO, include handwritten above or on a separate sheet. | | |
| 2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form. | | |
| 5. Is the site currently undergoing development? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

- | | YES | NO |
|--|-------------------------------------|--------------------------|
| 6. Is the current site use consistent with the use(s) listed below?
Commercial and Industrial | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. Are all ICs/ECs in place and functioning as designed? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

8/13/18
Date

SITE NO. V00687

Box 3

Description of Institutional Controls

Parcel

3.-3515-115

Owner

City of Yonkers

Institutional Control

Ground Water Use Restriction
Landuse Restriction

Site Management Plan

1. Groundwater Use Restriction: The use of groundwater underlying the property is prohibited without treatment to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval from the Department and the Westchester County Department of Health.

2. Land Use Restriction: The controlled property as described in the deed restriction is restricted to a commercial use. Vegetable gardens and farming on the controlled property is prohibited.

3. Site Management Plan: Any intrusive activities, including building renovation/expansion, subgrade utility line repair/relocation, and new construction which will cause a disturbance beneath the 1 foot topsoil cover must be conducted in accordance with the Department approved Site Management Plan (SMP).

Box 4

Description of Engineering Controls

Parcel

3.-3515-115

Engineering Control

Cover System

1. Cover System: Any soil on the property must be covered by a barrier layer approved by the Department such as concrete, asphalt, structures, or a minimum one (1) foot soil cover underlain by a demarcation barrier (e.g. geotextile) for vegetated areas. The soil cover will be placed over a demarcation layer, with the upper six inches of the soil of sufficient quality to maintain a vegetation layer. 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).

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

- a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;
- b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

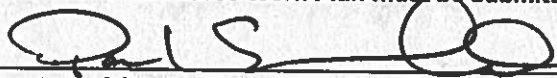
2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

- (a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;
- (b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;
- (c) access to the site will continue to be provided to the Department, to evaluate the _____ remedy, including access to evaluate the continued maintenance of this Control;
- (d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and
- (e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

A Corrective Measures Work Plan must be submitted along with this form to address these issues.


Signature of Owner, Remedial Party or Designated Representative

3/13/18
Date

IC CERTIFICATIONS
SITE NO. V00687

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

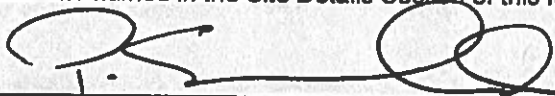
I certify that all information and statements in Boxes 1, 2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

CITY OF YONKERS

I PAUL N. SUMMERFIELD at 40 SOUTH BROADWAY, YONKERS, N.Y. 10701
print name print business address

am certifying as DESIGNATED REPRESENTATIVE OF OWNER (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.


Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

3/19/18
Date

IC/EC CERTIFICATIONS

Box 7

Qualified Environmental Professional Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I PAUL N. SUMMERFIELD at CITY OF YONKERS
print name 40 SOUTH BROADWAY YONKERS, N.Y. 10701
print business address

am certifying as a Qualified Environmental Professional for the CITY OF YONKERS
(Owner or Remedial Party)

Paul N. Summerfield
Signature of Qualified Environmental Professional, for
the Owner or Remedial Party, Rendering Certification



8/13/18
Date

V. MONITORING PLAN COMPLIANCE REPORT:

A. Components of the Monitoring Plan in Tabular Form.

Monitoring/Inspection Schedule as per the SMP

Monitoring Program	Frequency*	Matrix	Analysis
Cap/Cover	Annually	Not Applicable	Not Applicable
Stormwater System	Annually	Not Applicable	Not Applicable
Security Fence	Annually	Not Applicable	Not Applicable
Site Signage	Annually	Not Applicable	Not Applicable

* FREQUENCY OF EVENTS WILL BE CONDUCTED AS SPECIFIED UNTIL OTHERWISE APPROVED BY NYSDEC AND NYSDOH

B. Summary of Monitoring Completed During the Reporting Period.

The site was monitored formally by the City, and memorialized with a Monitoring Report, on August 23, 2017. The site was also observed periodically by the City on an informal basis, during the monitoring period as well. A copy of the referenced Monitoring Report is attached herewith.

C. Comparisons with Remedial Objectives.

Based on the observations and evaluations made in the above referenced Inspection Report, and as noted in Section IV above, the Site Engineering and Institutional Controls are in place, performing properly and are effective;

D. Monitoring Deficiencies.

No monitoring deficiencies were noted.

E. Conclusions and Recommendations for Changes.

As the referenced Site Engineering and Institutional Controls have been observed and evaluated to be in place, performing properly and are effective, no changes in monitoring are recommended at this time.

SITE INSPECTION RECORD

General Information

Inspection No. _____ Inspected By: JUAN C. DEJEUS
 Inspection Type: Annual Severe Weather Other _____
 Date & Date of Inspection: 8/23/17 Time Begin: _____ Time End: _____
 Weather Conditions: SUNNY DAY
 Site Records Inspected & Reviewed?: Yes No

Evaluation of Engineering Controls (provide photo's of all components inspected as noted below)

A. Cover System

1.0 Shallow Slope Areas

1.1 Vegetative Surface Cover: Coverage: 100 % Condition: Poor Fair Good
 1.2 Soil Cap: 8" Clean Fill: Full Depth: Yes No Stable: Yes No
 4" Top Soil: Full Depth: Yes No Stable: Yes No
 1.3 Indicator Layer: Is Layer Exposed: Yes No
 (describe repair as required): _____

2.0 Steep Side Slope Areas

2.1 Boulder Surface Cover: Full Depth: Yes No Stable: Yes No
 (describe repair as required): _____
 2.2 Indicator Layer: Is Layer Exposed: Yes No
 (describe repair as required): _____

B. Stormwater Management System

1.0 Surface Drainage: Do grades conform to design/as-built conditions: Yes No
 (describe repair as required): _____
 2.0 Off-site Systems: Are off-site systems functioning correctly: Yes No
 (describe repair as required): _____

C. Site Security System

1.0 Security Fence: Grade flush with base: Yes No Any Gaps: Yes No
 (describe repair as required): _____
 2.0 No Trespassing Signs: Are "No Trespassing" signs intact: Yes No
 (describe repair as required): _____

Summary of Engineering Controls: The Site Engineering Controls referenced above:

Are In place: Yes No Performing properly: Yes No Are effective: Yes No
 (describe repair as required): _____

Evaluation of Related Engineering Systems

Sanitary Sewers: Is system intact: Yes No Functioning: Yes No
 (describe repair as required): _____

Evaluation of Institutional Controls

1.0 Is restrictive covenant in effect for the property: Yes No
 2.0 Are site conditions indicative of a passive use: J.C. Yes No
 (provide explanation as required): _____

1060 NORTH BROADWAY - NYS DEC SITE NO. V00687-3

SITE INSPECTION RECORD (continued)

Health and Safety

1.0 Is there any evidence of unauthorized site entry:

Yes No

2.0 Is the site secure:

Yes No

3.0 Is there any evidence of site disturbance:

Yes No

(provide explanation as required):

Site Inspection Summary:

The site is in compliance with applicable New York State Department of Environmental Conservation permits and schedules in the Site Operation and Maintenance Plan.

or

The following activities must be performed for the site to be in compliance with applicable New York State Department of Environmental Conservation permits and schedules in the Site Operation and Maintenance Plan.

By:

[Handwritten signature]

Date:

8/23/17

Notes:

THE SITE WAS FOUND TO BE FULLY SECURED. ALL FENCING IS INTACT AND ENTRANCE GATE IS LOCKED. NO SIGNS OF PREVIOUS ENTRY WERE NOTICED. DRAINAGE SYSTEMS WERE FUNCTIONAL. ALL AREAS WERE FOUND TO BE UNDISTURBED.



VI. OPERATION & MAINTENANCE (O & M) PLAN COMPLIANCE REPORT:

As per the approved Site Management Plan, the site remedy does not rely on any mechanical systems, such as sub-slab depressurization systems or air purge/soil vapor extraction systems to protect public health and the environment. Therefore, the operation and maintenance of such components was deemed not required by the SMP.

VII. OVERALL PRR CONCLUSIONS AND RECOMMENDATIONS:

A. Compliance with SMP.

1. Institutional Controls/Engineering Controls.

The referenced Site Engineering and Institutional Controls have been observed and evaluated to be in place, performing properly, are effective and stable. As such, the requirements of the SMP have been met and no changes in the IC/EC's are recommended at this time.

The period of monitoring has been demonstrated, through the information contained in the inspection report, to be a reliable frequency with respect to all components and controls. As such, the requirements of the SMP have been met and no change to the monitoring frequency is recommended at this time.

2. Any requirements not met.

All requirements of the SMP have been met.

3. Proposed plans and a schedule for coming into full compliance.

As all requirements of the SMP have been met, the Site is considered by the City to be in full compliance.

B. Performance and Effectiveness of the Remedy.

Based upon our investigation and evaluation of the components of the Site Institutional and Engineering Controls during the term of this PRR, it is our opinion that all components of the SMP (cap/cover system, stormwater system, security system, the Restrictive Covenant and the conditions of site use) are performing as designed, and demonstrate the ability of the implemented remedy to achieve the remedial objectives for the site.

C. Future PRR Submittals.

1. Frequency of PRR Submittals.

Based on the results of the site inspections and monitoring efforts, as well as the relatively new closure status of the site, the City of Yonkers recommends that the frequency of the submittal of PRR's should remain unchanged;

2. Continuation of Site Management.

The City of Yonkers does not request any site management discontinuance at this time. Any possible future request to discontinue site management will be made to the NYSDEC Project Manager at such future time.