DECISION DOCUMENT

601 Washington Street
Brownfield Cleanup Program
New York, New York County
Site No. C231091
December 2015

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

DECLARATION STATEMENT - DECISION DOCUMENT

601 Washington Street
Brownfield Cleanup Program
New York, New York County
Site No. C231091
December 2015

Statement of Purpose and Basis

This document presents the remedy for the 601 Washington Street 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 601 Washington Street site and the public's input to the proposed remedy presented by the Department.

Description of Selected Remedy

The elements of the selected remedy are as follows:

1. Remedial Design

A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows;

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse gases and other emissions;
- Increasing energy efficiency and minimizing use of non-renewable energy;
- Conserving and efficiently managing resources and materials;
- Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;
- Maximizing habitat value and creating habitat when possible;
- Fostering green and healthy communities and working landscapes which balance ecological, economic and social goals; and,
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.

2. Excavation

Following demolition of the existing site building, all on-site soils which exceed restricted-residential SCOs, as defined by 6 NYCRR Part 375-6.8 in the upper 15 feet, and soils which exceed the protection of groundwater soil cleanup objectives (PGWSCOs), as defined by 6 NYCRR Part 375-6.8 for those contaminants found in site groundwater above standards, will be excavated and transported off-site for disposal. Approximately 5,000 cubic yards of contaminated soil will be removed from the site. Dewatering, with proper treatment for permitted sewer discharge and/or disposal at a permitted off-site facility, will occur throughout excavation and construction. It is believed that at least 10,000 gallons of contaminated water will be removed.

Two excavation grids in the southwest (SW) corner, and one in the southeast (SE) corner of the site, will be excavated more deeply based upon pre-excavation sampling. In the SW corner, the goal is to dig one to two feet deeper to allow for the removal of potential TCE-containing soils, as well as to facilitate dewatering in that area. In the SE corner, the goal is to dig out of leachable lead contamination that appears associated with historic fill material. Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be used to backfill the excavation and establish the designed grades at the site.

3. In-Situ Treatment

Dependent upon analytical results from groundwater sampling performed immediately following the excavation and dewatering discussed in remedial element 2, in-situ chemical applications may be implemented to treat TCE and PCE in groundwater. If necessary to achieve groundwater RAOs, a treatment agent will be introduced to destroy or degrade the remaining contaminants in an approximately 1,800 square foot area located in the southwestern portion of the site where TCE and PCE were most elevated in the groundwater. It is anticipated that the treatment agent will be placed at the bottom of the excavation, below the groundwater table. The treatment agent, method of introduction, and the quantity to be used will be determined during the remedial design.

4. Institutional Control

Imposition of an institutional control in the form of an environmental easement for the controlled property which will:

- require the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8(h)(3);
- allow the use and development of the controlled property for restricted residential use, as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- a provision for evaluation of the potential for soil vapor intrusion at future buildings developed on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
- restrict the use of groundwater as a source of potable or process water, without necessary

water quality treatment as determined by the NYSDOH or the NYCDOH; and,
- require compliance with the Department approved Site Management Plan.

5. Site Management Plan

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

a. an Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective:

Institutional Controls: The Environmental Easement discussed in Paragraph 4, above.

Engineering Controls: The site cover discussed in Paragraph 6, should that contingent remedial element be required.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- descriptions of the provisions of the environmental easement including any land use and/or groundwater use restrictions
- provision for the management and inspection of the engineering controls (e.g., site cover discussed in Paragraph 6 below), should the contingent remedial element be required;
- maintaining site access controls and Department notification; and,
- the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.

b. a Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:

- monitoring of groundwater to assess the performance and effectiveness of the remedy;
- a schedule of monitoring and frequency of submittals to the Department; and,
- monitoring for vapor intrusion for any future buildings developed on the site, as may be required by the Institutional and Engineering Control Plan discussed above.

c. 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) should an active system be required. The plan includes, but is 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.

In the event that Track 2 Restricted Residential use is not achieved, but all sources and/or grossly

contaminated media have been removed or otherwise properly addressed, the following contingent remedial element will be required for the remedy to achieve a Track 4 restricted-residential cleanup:

Contingent Remedial Element:

6. Site Cover

A site cover will be required to allow for Track 4 restricted residential use of the site. The cover will consist either of the structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper two feet of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where the soil cover is required it will be a minimum of two feet of soil placed over a demarcation layer, with the upper six inches of soil of sufficient quality to maintain a vegetative layer. Soil cover material, including any fill material brought to the site, will meet the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d).

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.

December 24, 2015

Date

Robert Cozzy, Director
Remedial Bureau B

DECISION DOCUMENT

601 Washington Street
New York, New York County
Site No. C231091
December 2015

SECTION 1: SUMMARY AND PURPOSE

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), has selected a remedy for the above referenced site. The disposal of contaminants at the site has resulted in threats to public health and the environment that would be addressed by the remedy. The disposal or release of contaminants at this site, as more fully described in this document, has contaminated various environmental media. Contaminants include hazardous waste and/or petroleum.

The New York State Brownfield Cleanup Program (BCP) is a voluntary program. The goal of the BCP is to enhance private-sector cleanups of brownfields and to reduce development pressure on "greenfields." A brownfield site is real property, the redevelopment or reuse of which may be complicated by the presence or potential presence of a contaminant.

The Department has issued this document in accordance with the requirements of New York State Environmental Conservation Law and 6 NYCRR Part 375. This document is a summary of the information that can be found in the site-related reports and documents.

SECTION 2: CITIZEN PARTICIPATION

The Department seeks input from the community on all remedies. A public comment period was held, during which the public was encouraged to submit comment on the proposed remedy. All comments on the remedy received during the comment period were considered by the Department in selecting a remedy for the site. Site-related reports and documents were made available for review by the public at the following document repository:

Hudson Park Library
Attn: Miranda Murray
66 Leroy Street
New York, NY 10014
Phone: 212-243-6876

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, Voluntary 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 601 Washington Street site is located in an urban area in Manhattan. The site is bounded by Greenwich Street to the east, Leroy Street to the south, Washington Street to the west and multi-story residential buildings to the north.

Site Features: The site encompasses approximately 8,930 square feet and is entirely covered by a vacant one- to two-story building with a concrete slab.

Current Zoning and Land Use: The site is located in the Special Mixed Use District (MX) within Manhattan with zoning designation M1-5/R7X, which allows for residential, community facility, commercial and manufacturing uses. The site was last occupied by the Gavin Brown Art Gallery, but is now vacant and slated for demolition.

Past Use of the Site: Historical use of the site includes a truck and auto repair shop; a brass foundry; a welding supply business; a truck garage, and; shipping and meat packing companies.

Site Geology and Hydrogeology: The subsurface strata at the site consists of historic urban fill typically comprising brown sand with trace gravel and brick fragments. The depth of fill is variable with a maximum recorded depth of 17 feet below ground surface (bgs) in the southern portion of the site. Underlying the fill material is a typically brown fine to coarse sand with occasional discontinuous thin layers of sandy silt. Depth to top of bedrock at a nearby site varied from about 73 to 79 feet bgs. The bedrock was identified as gray mica schist, and about three feet of light-gray decomposed rock overlaid the bedrock.

Groundwater occurs approximately 13 to 14 feet bgs. Localized groundwater appears to flow towards the southeast, though regional flow should be to the west, towards the Hudson River.

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 Volunteer does not have an obligation to address off-site contamination. The Department has determined that this site poses a significant threat to human health and the environment and there are off-site impacts that require remedial activities; accordingly, enforcement actions are necessary.

The Department will seek to identify any parties (other than the Volunteer) known or suspected to be responsible for contamination at or emanating from the site, referred to as Potentially Responsible Parties (PRPs). The Department will bring an enforcement action against the PRPs. If an enforcement action cannot be brought, or does not result in the initiation of a remedial program by any PRPs, the Department will evaluate the off-site contamination for action under the State Superfund. The PRPs are subject to legal actions by the State for recovery of all response costs the State incurs or has incurred.

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
- 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 is/are:

trichloroethene (TCE)	benzo(a)anthracene
tetrachloroethene (PCE)	lead

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.

Nature and Extent of Contamination:
Soil and groundwater were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, polychlorinated biphenyls (PCBs), and pesticides. Based upon investigations conducted to date, the primary contaminants of concern at the site include trichloroethene (TCE) and to a lesser extent tetrachloroethene (PCE), lead, and poly- aromatic hydrocarbons (PAHs), such as benzo(a)anthracene.

Soil - Lead was found at the site above residential, restricted residential and commercial soil cleanup objectives (SCOs) at levels as high as 4,400 parts per million (ppm). Several PAHs were found at the site as well, where benzo(a)antharacene exceeded all soil cleanup objectives (SCOs) at a level as high as 13 ppm. These contaminants are thought to be related to historic fill in the area and are not considered associated with past uses of the site. TCE was found in three soil borings in the southwest corner of the site within the suspected source area, at concentrations as high as 3.9 ppm. There is no data indicating that soil contamination extends off-site.

Groundwater - TCE and PCE are present in on-site groundwater wells. TCE was found as high as 470 parts per billion (ppb), and PCE has been detected at a level of 37 ppb. Up-gradient groundwater did not exhibit TCE contamination above standards; however, PCE was found above standards at a concentration as high as 22 ppb, which is slightly less than the concentration found on-site. PCE was detected in off-site, down-gradient well MW-10 at 26 ppb, and TCE was detected at 1.7 ppb.

Soil Vapor - TCE was detected in sub-slab vapor at concentrations as high as 497 micrograms per cubic meter (ug/m3); PCE was also detected at a high of 99 ug/m3. No indoor air samples were collected, so indoor air impacts are currently unknown. Additional sampling is needed to determine whether off-site structures are impacted by soil vapor intrusion.

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 may contact contaminants in soil if they dig below the existing building. Contaminated groundwater at the site is not used for drinking or other purposes as 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. The inhalation of site-related contaminants due to soil vapor intrusion does not represent a current concern because the site is vacant. The potential exists for people to inhale site contaminants in indoor air due to soil vapor intrusion if the on-site building is re-occupied or if new buildings are developed. Additional investigation is needed to further evaluate potential off-site exposure pathways associated with this site.

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.

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 2: Restricted use with generic soil cleanup objectives remedy.

The selected remedy is referred to as the Soil Excavation with Possible In-Situ Treatment of Groundwater remedy.

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

1. Remedial Design

A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows;

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse gases and other emissions;
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- Maximizing habitat value and creating habitat when possible;
- Fostering green and healthy communities and working landscapes which balance ecological, economic and social goals; and,
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.

2. Excavation

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4. Institutional Control

Imposition of an institutional control in the form of an environmental easement for the controlled property which will:

- require the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8(h)(3);
- allow the use and development of the controlled property for restricted residential use, as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
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- restrict the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or the NYCDOH; and,
- require compliance with the Department approved Site Management Plan.

5. Site Management Plan

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

a. an Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective:

Institutional Controls: The Environmental Easement discussed in Paragraph 4, above.

Engineering Controls: The site cover discussed in Paragraph 6, should that contingent remedial element be required.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;

- descriptions of the provisions of the environmental easement including any land use and/or groundwater use restrictions
- provision for the management and inspection of the engineering controls (e.g., site cover discussed in Paragraph 6 below), should the contingent remedial element be required;
- maintaining site access controls and Department notification; and,
- the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.

b. a Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:

- monitoring of groundwater to assess the performance and effectiveness of the remedy;
- a schedule of monitoring and frequency of submittals to the Department; and,
- monitoring for vapor intrusion for any future buildings developed on the site, as may be required by the Institutional and Engineering Control Plan discussed above.

c. 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) should an active system be required. The plan includes, but is 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.

In the event that Track 2 Restricted Residential use is not achieved, but all sources and/or grossly contaminated media have been removed or otherwise properly addressed, the following contingent remedial element will be required for the remedy to achieve a Track 4 restricted-residential cleanup:

Contingent Remedial Element:

6. Site Cover

A site cover will be required to allow for Track 4 restricted residential use of the site. The cover will consist either of the structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper two feet of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where the soil cover is required it will be a minimum of two feet of soil placed over a demarcation layer, with the upper six inches of soil of sufficient quality to maintain a vegetative layer. Soil cover material, including any fill material brought to the site, will meet the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d).

GENERAL NOTES:

1. BASE MAP TAKEN FROM USGS TOPOGRAPHICAL MAPS FOR BROOKLYN AND JERSEY CITY QUADRANGLES.

Figure 1 - Site Location

601 Washington Street

New York, NY

Site ID No. C231091

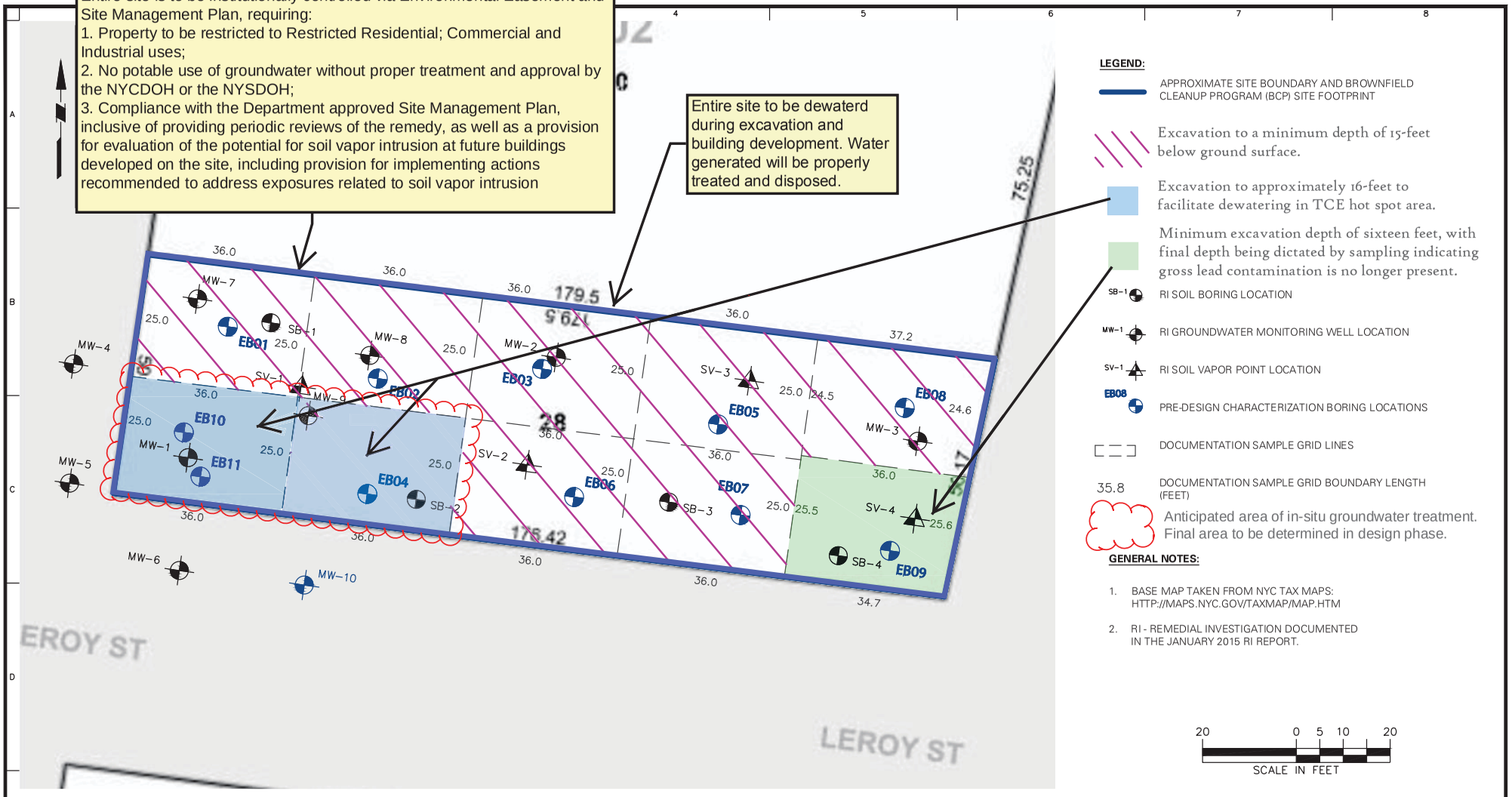

Figure 2 - Components of the Remedy

601 Washington Street Site

Site ID No. C231091