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**Re: NYC BCP Remedial Action Work Plan Approval
3131 Richmond Terrace (Devon Self Storage)
Block 1208, Lot 10
BCP Project #12CBCP032R**

Dear Ms. Siclari:

The New York City Office of Environmental Remediation (OER), in consultation with the New York City Department of Health and Mental Hygiene (DOHMH), has completed its review of the Remedial Action Work Plan (RAWP) and Stipulation List for the 3131 Richmond Terrace (Devon Self Storage), BCP Project #12CBCP032R, dated July 20, 2012. The Plan was submitted to OER under the NYC Brownfield Cleanup Program (BCP). The RAWP was released for public comment for 30 days as required by program rule. That comment period ended on May 23, 2012. Two sets of site specific public comments were received, and included concerns were raised regarding environmental issues in Richmond Terrace area.

The following remedial action elements will be implemented at the project site:

Statement of Purpose and Basis

This document presents the remedy for a Brownfield Cleanup site known as “3131 Richmond Terrace (Devon Self Storage)” site. This document is a summary of the information that can be found in the site-related reports and documents in the document repository at OER’s website: http://www.nyc.gov/html/oer/html/repository/RStaten_Island.shtml#Devon_Self_Storage_-_12CBCP032R.

The New York City Office of Environmental Remediation (the Office or OER), in consultation with the New York City Department of Health and Mental Hygiene (DOHMH), has established a remedy for the above referenced site. The disposal or release of contaminants at this site, as more fully described in this document, has contaminated various environmental media. Contaminants include hazardous substances.

The decision is based on the Administrative Record of the New York City Office of Environmental Remediation (the Office or OER) for the 3131 Richmond Terrace (Devon Self Storage) Site and the public's input to the proposed remedy presented by the Office.

Description of Selected Remedy

The remedy selected for this 3131 Richmond Terrace (Devon Self Storage) Site includes soil excavation, cover system, and an active sub-slab depressurization system beneath the office space. The remedial action will apply Track 4 SCOs. A Site Management Plan will be required for long-term management of residual contamination.

The elements of the selected remedy are as follows:

1. Preparation of a Community Protection Statement and implementation of a Citizen Participation Plan.
2. Perform a Community Air Monitoring Program for particulates and volatile organic compounds.
3. Establish Track 4 Soil Cleanup Objectives (SCOs).
4. Maintenance of an engineered composite cover consisting of concrete and asphalt pavement, clean soil cover and building slab to prevent human exposure to residual soil/fill remaining under the Site;
5. Protection of the existing vapor barrier system beneath the building slab. The vapor barrier planned for this project is 6-mil polyethylene sheeting to be installed beneath the restored building slab at the suction pit locations.
6. Installation and operation of an active sub-slab depressurization system in the vicinity of the occupied office space.
7. Import of materials to be used for backfill and cover in compliance with this plan and in accordance with applicable laws and regulations.
8. Transportation and off-Site disposal of all soil/fill material at permitted facilities in accordance with applicable laws and regulations for handling, transport, and disposal, and this plan. Sampling and analysis of excavated media as required by disposal facilities. Appropriate segregation of excavated media onsite.
9. Screening of excavated soil/fill during intrusive work for indications of contamination by visual means, odor, and monitoring with a PID.
10. Site mobilization involving Site security setup, equipment mobilization, and marking & staking of proposed SSDS extraction points.

11. Submission of a RAR that describes the remedial activities, certifies that the remedial requirements have been achieved, defines the Site boundaries, and describes all Engineering and Institutional Controls to be implemented at the Site, and lists any changes from this RAWP.
12. Submission of an approved Site Management Plan (SMP) in the RAR for long-term management of residual contamination, including plans for operation, maintenance, monitoring, inspection and certification of Engineering and Institutional Controls and reporting at a specified frequency.
13. Recording of a Declaration of Covenants and Restrictions that includes a listing of Engineering Controls and a requirement that management of these controls must be in compliance with an approved SMP; and Institutional Controls including prohibition of the following: (1) vegetable gardening and farming; (2) use of groundwater without treatment rendering it safe for the intended use; (3) disturbance of residual contaminated material unless it is conducted in accordance with the SMP; and (4) higher level of land usage without OER-approval.

Remedial activities will be performed at the Site in accordance with this OER-approved RAWP. All deviations from the RAWP will be promptly reported to OER. Changes will be documented in the RAR.

This remedy conforms to the promulgated standards and criteria that are directly applicable, or that are relevant and appropriate and takes into consideration OER guidance, as appropriate. The remedy is protective of public health and the environment.

7/22/12

Date



Shaminder Chawla
Assistant Director

SITE BACKGROUND

Location:

The Site is located at 3131 Richmond Terrace (Devon Self Storage) in Staten Island, New York and is identified as Block 1208 and Lot 10 on the New York City Tax Map. Figure 1 shows the Site location.

Site Features:

The 3131 Richmond Terrace (Devon Self Storage) Site is 78,000-square feet and is bounded by May Ship Repair (3075 Richmond Terrace) to the north, Richmond Terrace to the south, May Ship Repair to the east, and McAllister Towing & Transportation (3165 Richmond Terrace) to the west. Currently, the Site is used as a commercial self storage facility and contains one 4-story warehouse connected to one 2-story warehouse building. The buildings are connected by a common wall and comprise the majority (at least 70%) of the property. Concrete paved driveways, concrete pads and asphalt parking areas and a soil covered parking median comprise the remainder of the Site. The building is designed for vehicular access and includes a heating ventilation and air conditioning (HVAC) system to meet high level air exchange requirements established in NYC building codes for buildings occupied by motor vehicles. In addition, a grass landscaped area was installed in front of the building during Site development in 2007 through 2010. The topography of the combine Site and its vicinity is generally level. The surrounding property uses are predominantly residential and commercial.

Current Zoning/uses:

The current zoning designation is M3-1 for Occupancy Group B-1 – Moderate Hazard Storage per the New York City Building Code, Title 27, Subchapter 3. Devon’s client storage agreement does not allow for the storage of any hazardous materials on-site. The proposed use is consistent with existing zoning for the property.

Summary of Site Redevelopment History:

The Site was redeveloped in 2007 - 2010 to construct the Devon Self Storage Facility. Site redevelopment consisted of renovation of one 2-story building (north building) and demolition of one pre-existing building (south building) and construction of a new 4-story self storage warehouse in its place.

Summary of Environmental Findings:

1. Elevation of the property ranges from 3.8 to 7.5 feet.
2. Depth to groundwater ranges from 3.07 to 4.87 feet at the Site.
3. Groundwater flow is generally from southwest to northeast beneath the Site towards Newark Bay.
4. Depth to bedrock is reportedly 40 feet based upon driller correspondence, but was not encountered during the investigation at the Site.
5. The stratigraphy of the site, from the surface down, consists of an approximately 10 foot thick fine to coarse sand and gravel fill layer underlain by an organic silty clay layer of undetermined thickness.

A site location map is attached as Figure 1.

LAND USE AND PHYSICAL SETTING

The Office 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 3131 Richmond Terrace (Devon Self Storage), a Track 4 remedial action alternative was considered in alternative analysis. A Track 4 remedial action alternative includes establishment of Track 4 site specific SCOs, installation of a sub-slab depressurization system (SSDS) in the area of the occupied building office to address soil vapor remediation and capping of surficial soils to prevent contact with underlying soil, soil vapor and groundwater. Vehicles have access within the remainder of the building and extended HVAC controls required by the NYC Building Code will address any potential soil vapor migration into these areas of the facility.

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.

PROPOSED DEVELOPMENT PLAN

The current zoning designation is M3-1 for Occupancy Group B-1 – Moderate Hazard Storage per the New York City Building Code, Title 27, Subchapter 3. Devon's client storage agreement does not allow for the storage of any hazardous materials on-site. The proposed use is consistent with existing zoning for the property.

The proposed future use of the Site will remain as a self-storage warehouse. The warehouse contains an indoor drive through access path for vehicular offloading, multiple climate controlled storage units, two elevator bays and a 1,200 ft² office area.

The remedial action contemplated under this RAWP may be implemented independently of the proposed redevelopment plan.

SUMMARY OF 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 5.4.

Nature and Extent of Contamination:

Soil: Soil/fill samples collected during the RI showed no VOCs that exceeded Track 2 Commercial SCOs in any of approximately 23 samples. Several samples (generally 2 samples or less) were observed with VOC detections above Track 1 Unrestricted SCOs for benzene, carbon tetrachloride, cis-1,2 dichloroethene, acetone and trichloroethene. These detections were all well below Track 2 Commercial SCOs. Other VOCs including some BTEX and associated compounds were detected at low and trace levels and well below Track 1 Unrestricted SCOs. A variety of SVOCs were identified above Track 1 and Track 2 Commercial SCOs. All of these exceedances were PAH compounds. Three metals, barium, copper and lead, exceeded Track 2 Commercial SCOs in soil samples collected at the site. However, soil samples did not exceed TCLP limits for lead. Several metals exceeded Track 1 Unrestricted SCOs but were below Track 2 Commercial SCOs including selenium, zinc, cadmium, arsenic and mercury. In most of these cases Track 1 SCOs were exceeded in only one or two samples. No PCBs or pesticides exceeded Track 2 Commercial SCOs. PCBs were detected in one sample slightly above the Track 1 Unrestricted SCO. One pesticide, 4,4-DDT was detected in four samples above Track 1 SCOs.

Groundwater: Groundwater samples collected during the RI showed no VOCs were detected in groundwater above 6NYCRR Part 703.5 Class GA groundwater quality standards (GQS). Several VOCs were detected in groundwater at trace or low levels but below GQS. TCE and PCE were not detected in groundwater samples collected in 2011. TCE was found at trace concentrations (1 ug/l) in one sample below GQS in 2007. No PCBs or pesticides were detected in groundwater. No SVOCs were detected in groundwater in 2007 sampling. Several SVOCs were detected at low concentrations in one sample in 2011 sampling. All of the compounds were high molecular weight PAH compounds and may be related to entrained particulates from fill material. Dissolved metals showed no exceedance of GQS with the exception of sodium and manganese. High sodium suggests the influence of saline intrusion.

Soil vapor: Soil vapor samples collected during the RI contained a variety of low level findings for BTEX and associated petroleum compounds but generally concentrations were identified below 50 ug/m³. PCE was identified in most vapor samples at concentrations ranging as high as 160 ug/m³. TCE was also identified in most samples collected and ranged as high as 2,100 ug/m³. Chloroform, acetone and carbon tetrachloride also exceeded 1,000 ug/m³ in at least one soil vapor sample. These findings generally correlate with VOCs identified in onsite soil samples that exceed Track 1 SCOs and suggest an onsite origin for these vapors. Most of the site is covered with pavement or concrete building slab and buildup of vapor in the vadose zone below the site is expected. These findings support the need for vapor mitigation in the remedial action for this property.

Figure 1: Site Location Map



Figure 2: Site Aerial Map

