

**FINAL**  
**GENERIC ENVIRONMENTAL IMPACT STATEMENT**

**Oneonta Rail Yard Re-development  
City of Oneonta  
Otsego County, New York**

**SEQRA TYPE 1 ACTION**

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**June, 2019**

## Contents

Introduction and Purpose .....	1
Goal of the Project .....	2
Response To Comments .....	3
Site Access and Transportation.....	3
Water.....	5
Sewer .....	6
Power .....	7
Stormwater Management/Floodplain.....	10
Wetlands .....	12
Former Site Use Impact .....	15
Habitat.....	16
Process/Procedure .....	17

## Attachments

Attachment A: Public Comment Log

Attachment B: Phase II Environmental Site Assessment Report, 2006, USEPA Brownfields Program

## **Introduction and Purpose**

The City of Oneonta Common Council, as Lead Agency, has conducted an environmental review for the Redevelopment of the Oneonta Railyards in the City of Oneonta, Otsego County, New York, as proposed by the County of Otsego Industrial Development Agency (COIDA). Though there is no actual proposed re-development project at this time, the rail yard site is by far the largest infill development area within the City of Oneonta, and this commercial/industrial zoned land is highly underutilized. Through the creation of a Master Plan for the site, the County of Otsego Industrial Development Agency (COIDA) can better attract and anticipate development within the site.

A coordinated review for Lead Agency status was initiated by the Common Council on September 28, 2017, and on January 16, 2018, the Common Council, having received no objections from involved agencies, declared itself Lead Agency for this project, made a Determination of Significance, and issued a Positive Declaration with its Notice of Intent to Prepare a Draft Generic Environmental Impact Statement (DGEIS). The Scoping process to define the DGEIS included two public meetings.

The Draft Generic Environmental Impact Statement (DGEIS) was prepared in accordance with Article 8 of the New York Environmental Conservation Law, the State Environmental Quality Review Act (SEQRA or SEQR) and the implementing regulations incorporated in 6 NYCRR Part 617. The DGEIS has been prepared to document the environmental review of the potential redevelopment of the rail yards and to seek comments and input from the public and involved and/or interested agencies.

The Common Council of the City of Oneonta passed a resolution on January 15, 2019, accepting the Draft Generic Environmental Impact Statement (GEIS), beginning the public comment period, and establishing the public hearing date for the Oneonta Rail Yards Redevelopment project. The public comment period was initially to run through February 22, 2019; however, the comment period was extended to March 18, 2019. A Public meeting was held February 5, 2019, and a Public comment hearing held on March 5, 2019. The Draft Generic Environmental Impact Statement was available on the City of Oneonta's (Lead Agency) and County of Otsego IDA's (Applicant) websites, as well as on CD at the public library.

During the comment period, the public and involved and/or interested agencies provided comments regarding the DGEIS. At the conclusion of a comment period, the Lead Agency prepares a Final Generic Environmental Impact Statement (FGEIS) which incorporates the DGEIS together with responses to comments. The final step in the process is the issuance of a findings statement by the lead agency. The

findings statement will document environmental analysis in summary form and set forth specific conditions or criteria for future development.

This document is the FGEIS, and as such includes the DGEIS, responses to all substantive comments, a log of written and oral comments and the 2006 Phase II Environmental Site Assessment Report for the Rail Yards, prepared under the USEPA Brownfields Assessment Program.

Eighty-five (85) individuals or entities submitted written comments and/or spoke at public meetings. In preparing this FGEIS and responses to the comments, the lead agency has elected to provide general responses to the comments based on subject area. The relevant subject areas are identified below:

- 1) site access and transportation
- 2) water supply
- 3) sewer
- 4) power
- 5) stormwater management/floodplain
- 6) wetlands
- 7) former site use impact
- 8) habitat
- 9) Process/Procedure

### **Goal of the Project**

The goal of the project is to prepare a redevelopment master plan and economic development strategy for approximately 50 acres of an 80-acre site owned by the County of Otsego Industrial Development Agency (COIDA) at the Oneonta railyard. The rail yard site is by far the largest infill development area within the City of Oneonta, and this commercial/industrial zoned land is highly underutilized. At this time there is no actual proposal for redevelopment of the rail yard. The completion of the GEIS facilitates marketing the rail yards to prospective developers by documenting the environmental setting and reviewing potential impacts of a future redevelopment of the site.

The GEIS is a due diligence document which identifies the environmental setting, identifies the potential limitations on future development (e.g., wetlands, traffic, energy, stormwater management, endangered species and community character and services) and identifies potential mitigation strategies. By creating

this tool, COIDA can market the property for the development with full disclosure and transparency. A potential developer can then review the GEIS and make a reasoned judgment whether a site-specific project is feasible and practical at this location. Any future site-specific project will be subject to full environmental and land use review including, but not limited to, site plan, stormwater permit, Army Corps wetland permit, state wetland permit, state and local transportation permits, archaeological evaluation (if necessary) and project-specific SEQRA review. After giving consideration to the extent that the environmental impacts of a potential site-specific project are identified and evaluated in this FGEIS, a future Lead Agency will make a determination of significance whether to require a supplemental Environmental Impact Statement (SEIS) and/or a new Environmental Impact Statement (EIS).

The goal of the owner of the property (COIDA) is to foster redevelopment of the railyard by new businesses/institutions that will create new jobs and add to the local tax base. The master plan evaluated in the DGEIS focused on potential industrial commercial uses, including food processing, brewing/manufacturing, packaging, warehouse/storage, temperature-controlled distribution, import and export. Those uses were identified based on a perceived need and suitability for such uses at this location (access to both highway and rail) and proximity to existing agricultural resources. The actual future redevelopment of the property may be for an entirely different use or uses provided such plan achieves the objectives of creating new jobs, adding to the local tax base and obtains all necessary state, local and federal approvals.

The intensity of the evaluated redevelopment (full build out) was selected, in part, to identify constraints on the site including the potential infrastructure needs and environmental limitations that could arise once a site site-specific project is proposed. In this FGEIS, the lead agency is not making any determinations and/or judgments regarding suitable and/or approvable redevelopment plans. Any future redevelopment plan will have to be evaluated by all the involved agencies based on its own merit.

## **Response To Comments**

### **Site Access and Transportation**

Current land uses in and near the rail yard include a mix of industrial, manufacturing, warehouse/storage, lands owned by the Delaware & Hudson Railways, and other commercial land uses. A traffic impact and access study (TIAS) for the proposed plan to redevelop approximately 50-acres of the Oneonta Rail Yard in the City of Oneonta in Otsego County has been conducted and is appended to the GEIS as Appendix F. The TIAS quantifies existing traffic conditions and includes a sensitivity evaluation during the summertime

when recreational traffic exists in the study area, primarily related to the operation of the Cooperstown All Star Village baseball camp facility. -Projected traffic conditions from the proposed redevelopment are also provided. Build traffic volumes were determined by estimating site-generated traffic volumes and distributing these volumes over the study area roadways. The site generated traffic volumes include new trips that are likely to be generated with the Redevelopment Plan development.

The study includes a detailed evaluation of the following eight intersections and a crash evaluation of the latest three years of available data from the New York State Department of Transportation (NYSDOT) along road stretches including these intersections; :

1. NY Route 205/Oneida Street (NY Route 7)
2. NY Route 205/Country Club Road
3. Oneida Street (NY Route 7)/Lower River Street (CR 8)/Country Club Road
4. Lower River Street (CR 8)/Roundhouse Road/Ceperley Avenue
5. Chestnut Street (NY Route 7/23)/Ceperley Avenue/Murdock Avenue
6. Chestnut Street (NY Route 7/23)/Fonda Avenue
7. Roundhouse Road/Fonda Avenue
8. Chestnut Street (NY Route 7/23)/Main Street

The locations of these intersections are identified on the Google aerial image in Figure 3.4.1. As set forth in the GEIS, the TIAS did not identify any potentially significant adverse impacts associated with the proposed redevelopment.

#### Public Comment

Many of the public comments that were received focused on the potential impact an increased number of tractor trailers would have on local roads in residential neighborhoods. The majority of comments related to this concern were based on the assumption that these tractor trailers would be carrying compressed natural gas (CNG), and stressed consideration must be given to the potential impact of trucks carrying CNG to the site. It was noted that some roads are already too narrow for heavy vehicles and emergency vehicles and that there are dangerous intersections in the study area. One comment stated that intersection of I-88/ Route 205 should have been evaluated. Many commenters questioned the overall adequacy of the TIAS study and asserted that the Town of Oneonta should have been involved in the SEQRA review process since tractor trailers and other traffic may need to pass through the Town to get to the Rail Yard from the interstate. One commenter recommended that the Lead Agency perform additional studies using a Vehicle Miles Traveled (VMT) matrix, but also acknowledged that such analysis is not required as part of the Lead Agency's SEQRA review.

### Response to Public Comment

The TIAS anticipated that vehicle trips to the site could potentially be reduced by businesses that use the railroad as a means for importing and exporting supplies and/or products. However, since much of the peak hour travel to and from site is associated with the movement of employees to and from each business, a reduction in the AM and PM peak hour trip generation was not taken. This provided a conservative evaluation of the trip generation at the site. The TIAS acknowledged that traffic from I-88 utilizes NYS Routes 7 and 205 to access lower River Street and Roundhouse Road and that these roads would provide access to the Study Area. Crash data evaluated included that for NY Route 205 between County Road 48 and Chestnut Street.

The crash evaluation included as part of the TIAS did not identify any prevalent crash types or patterns. The TIAS states the primary contributing factors of the intersection crashes were identified as driver inattention, following too closely, failure to yield right-of-way, and disregard of traffic control devices. Only three (3) out of the forty-two (42) crashes at the study area intersections were noted as being associated with heavy vehicle traffic.

Finally, it is noted that many commenters stressed consideration must be given to the potential impact of trucks carrying CNG to the site, however, the power needs of any future development are not known at this time and it would be speculative to conclude that there would be trucks carrying CNG to and from the Study Area. When and if a site-specific project is proposed, the project sponsor will have to apply to NYSEG for its electricity and power needs or rely on on-site renewable sources. Any potential impacts to site access and transportation associated with that project would then be identified and analyzed.

In sum, the public comments have raised various issues regarding the potential traffic impact and the adequacy of the TIAS study. As part of this GEIS process, the lead agency is not conducting any further study of traffic issues at this time. When and if a site-specific project is proposed, the lead agency and/or approval agencies will determine whether an updated traffic impact and access study is necessary and appropriate. That study will necessarily take into account specific design features and needs of the proposed project.

### **Water**

A summary description of drinking water resources is included in the GEIS at Section 2.3.3. and Section 3.6.1.1. The City of Oneonta water system serves 15,954 people who live in the City of Oneonta, and parts of the Town of Oneonta. The source of the water supply is surface water drawn from Wilber Lake and the

Lower Reservoir (along Oneonta Creek), and ground water from the Catella Park Well located in Neahwa Park.

The water flows by gravity from the Lower Reservoir and is pumped from the Catella Park Well (when in use), through the Water Treatment Plant. The water is treated through filtration, disinfection, pH adjustment, fluoridation, and corrosion control treatment before being pumped to the storage tanks and the distribution system. Total water produced in 2017 was 543 million gallons, almost 1.5 million gallons per day (MGD). The highest single day production was 2.36 MGD. Approximately 28% of that water produced goes to use in flushing mains, fighting fires or is lost to leakage. (Oneonta Annual Drinking Water Quality Report for 2017).

According to the City of Oneonta Water Map 1975 (revised 1992), there are water mains along the boundary of railyard. There is a 12-inch main across the southern periphery of the area, following West Broadway; 6- and 8-inch mains along Ceperley Avenue to the west; 8-inch main along Chestnut to the north; and 6-inch main from Chestnut to West Broadway along Fonda Avenue to the east.

#### Public Comment

Public comments state that the GEIS “defers” specific plans to provide water service to the site and stress that the Town of Oneonta should be involved if there will be a “large draw” on municipal water supplies.

#### Response to Public Comment

As stated in the GEIS at Section 3.6.3.1, specific determinations for water quantities, access and design of water distribution additions will be developed in consultation with the City of Oneonta, if and when a specific project is proposed. It is noted that water distribution and/or storage systems for a proposed project may require approval from the New York State Department of Health (NYSDOH). The Lead Agency is not conducting any further study of water supply issues as part of this GEIS process.

#### **Sewer**

A summary description of the sewer system in the vicinity of the Project site is included in the GEIS at Section 2.3.4 and discussed in more detail at Section 3.6.1.2. Wastewater is treated at the wastewater treatment plant (WWTP) at the south side of Susquehanna River, Silas Lane, adjacent to Exit 13 off Interstate 88. The WWTP, which utilizes Rotating Biological Contactors (RBCs), is permitted at a discharge of 4 MGD, and by-pass overflow at 5\_MGD, to discharge to the Susquehanna River.



The City of Oneonta Overall Sewer Plan 2007 indicates that there are sewer mains along the boundary of railyard. There is an 8-inch sewer main along River Street; a 15-inch main along the west side of the project site from River Street/Ceperley Avenue to Schaffer Avenue; 12-inch main along Chestnut Street to the north; a sewer main off Fonda Ave on the east providing 8-inch sewer to existing buildings south of Roundhouse Road in the southeast area of the project; 12-inch sewer on West Broadway south across the rail lines.

### Public Comments

The public comments state that the GEIS “defers” plans for wastewater treatment based on language in the GEIS which acknowledges there are no specific plans for providing wastewater treatment at this time and that such plans will be developed when and if a specific project is proposed.

### Response to Public Comment

The GEIS recognizes that any future project sponsor would have to apply for a permit from the City of Oneonta Sewer District and a sewer collection system approval from the New York State Department of Environmental Conservation (NYSDEC) if and when a site-specific project is proposed. The Lead Agency and/or other permitting agencies would address capacity, quality and design issues at that time as part of the state and local permitting approval process. Under the City of Oneonta Sewer Use Law, the project sponsor would have to submit an application for an industrial discharge and the City Engineer would determine whether the discharge is approvable based on the water quality, pretreatment requirements, capacity and condition of the sewer system. Based on the foregoing, the Lead Agency is not conducting any further study of water supply issues as part of this GEIS process.

### **Power**

Information on power at the Project site is summarized in Section 2.3.5 as follows; -NYSEG provides electric service to the City of Oneonta, and currently serves commercial buildings in the Study Area. A total connected load is estimated at 7.7 MW (or 67,452 MWh/year) for the Preferred Option utilized in the GEIS, in consideration of the projected types of commercial/industrial space usage, as shown in Table 2.3.5a. The capacity to supply the projected amount of electricity needed does not currently exist at the project location.

According to information from NYSEG, the surrounding 4.8KV distribution in the vicinity of Roundhouse Road is served from the Pierce Avenue and Henry Street substations. The Pierce Avenue 4.8KV and 12.5KV substation transformers do not have the capacity to support the potential load. The Henry Street

substation transformer is currently at 4.8KV, but it is a dual voltage 4.8x12.5KV 14MVA bank and appears to have about 10MVA of excess capacity.

Natural gas usage is estimated at approximately 40,000 MMBtu per year for commercial/industrial spaces of the sizes projected in the Preferred Option at maximum build out, as shown in Table 2.3.5b. Modern energy efficient construction of buildings will reduce heating and cooling demands in conformance with building codes. Currently capacity in the natural gas local distribution may not be available.

The GEIS states that NYSEG will have to be consulted when and if specific development plans are proposed, at which time NYSEG would be required to provide project -specific details regarding needed system upgrades, conversions, construction, and costs to customers.

Further information on available power resources, potential impacts and mitigation is available in the GEIS at Sections 3.6.1.6, 3.6.2.6 and 3.6.3.6. This includes the recommendation that geothermal and/or other energy alternatives should be considered for re-development of the rail yard. Section 9.0 outlines alternative energy options and possibilities for funding such options.

### Public Comment

Public commenters stressed the need to promote energy conservation, renewable energy solutions and more efficient energy and building choices that move the community away from fossil fuel energy. It was asserted that nothing should be built unless it can be built using the most advanced building and heating technologies and that any site-specific project should be required to use renewable energy. It was stated that regional planning for energy needs should take place before redevelopment of the railyard is considered, and commenters acknowledged that Otsego County has just created an energy taskforce to examine and develop a countywide energy plan.

Many public comments assert that potential impacts of other energy development projects, including a proposal for a CNG station in the Town of Oneonta, should be considered as part of the DGEIS. Many commenters state, because the railyard redevelopment is “associated with” a plan to expand gas infrastructure in the area, the potential impacts of both proposals should be considered together in the GEIS. They also express their general opposition to a CNG station and the use of natural gas in connection with any future development on the site.

It was noted that the DEIS included a discussion of renewable energy alternatives, but commenters stated that the potential environmental impact of each alternative, potential mitigation measures and “identification of a preferred energy development regime” that includes plans for intermunicipal

coordination should be provided. It was also recommended that an analysis of the direct and indirect Greenhouse Gas (GHG) emissions associated with the proposed redevelopment be provided that includes off-site “energy plants” and potential GHG reductions that could be realized by incorporating more renewable energy options in a final project design. It was also stated that additional renewable energy sources such as hydroelectric, tidal power, fuel cell power and “other” renewable energy technologies should be considered.

### Response to Public Comment

As part of this GEIS process, the Lead Agency is not conducting any further study of energy related issues. It is noted that many comments incorrectly conclude that natural gas will be utilized at the site, however the GEIS states that the energy needs for a specific project will have to be identified and addressed when and if a site-specific project is proposed. At that time, the project sponsor would have to apply to NYSEG for its electricity and power needs or rely on on-site renewable sources. Also, as part of any site-specific project approval process (including SEQRA), issues related to energy use, greenhouse gas emissions, and availability of renewable energy will have to be evaluated by the Lead Agency and/or the other involved agencies based upon conditions and circumstance at that time and the proposed use.

The energy/power supply system is in a state of flux as society tries to reduce its dependence on fossil fuels. The redevelopment of the rail yard is not dependent on the expansion of natural gas infrastructure or the construction of a new CNG station. The GEIS projected potential site power needs based on a potential redevelopment project, in order to identify site limitations, but also discusses future power supply options including several renewable energy alternatives. As part of this GEIS process, it would be premature to establish energy related mitigation measure for an unknown project at an unknown time for an unknown energy supply system.

Based upon the public comments, any future project sponsor or involved agency is informed about the need to take action to combat climate change and the public support for such action. As stated in the public comments, the county has established a fact-finding panel to investigate/evaluate the energy needs and alternatives for the county. As part of this GEIS process, the Lead Agency does not have the authority, information nor funding to control or dictate an energy plan for Otsego County. The Lead Agency believes that it has satisfied its obligations under this GEIS of identifying the energy supply issues, potential mitigation measures, and the overwhelming public comment in support of renewable energy.

### **Stormwater Management/Floodplain**

Historically the Study Area was likely part of the floodplain of the Susquehanna River. Since the construction of the rail line and then Interstate 88, the Susquehanna has been cut off from this portion of the floodplain. The Study Area is mapped as north of the 500-year flood line on Flood Insurance Rate Map (FIRM) Panel 36077C0654E, 2017, included in Appendix C. The 500-year flood zone is south of the rail line. However, the map notes that the structure that impacts flood hazards in that zone has not been shown to comply with Section 65.10 of the National Flood Insurance Program regulations, and the FIRM panel will be revised at a later date.

Stormwater issues identified for the redevelopment of the railyard are summarized in the GEIS at Section 2.3.7. The addition of parking areas, roadways and buildings will contribute to impervious surface increases in Study Area. New York's State Pollutant Discharge Elimination System (SPDES) is a National Pollution Discharge Elimination System (NPDES) approved program which issues permits in accordance with Articles 17 and 70 of the Environmental Conservation Law (ECL). Construction projects involving the disturbance of one or more acres must obtain coverage under the SPDES General Permit, Stormwater Discharges from Construction Activities (GP-0-15-002 or current). If conditions on the construction site constrict the ability of the project to meet the requirements in the General Permit, an Individual Permit will be required. The specifics of a future re-development plan will determine the type of permit required.

A Stormwater Pollution Prevention Plan will be required for both the construction and post-construction periods of any re-development. Stormwater management practices that will be implemented include minimizing the area of disturbance to the extent practicable, construction sequencing, and a combination of structural (temporary and permanent) and vegetative measures to minimize erosion and sediment loading to the drainage features and wetlands located in the Study Area. All erosion and sediment controls will be installed in accordance with the technical standards outlined in the most recent editions of the NYSDEC New York State Stormwater Management Design Manual (Design Manual), and the New York State Standards and Specifications for Erosion and Sediment Control (NYSSESC). Project construction sequencing will limit the area of soil disturbance to less than five (5) acres at any one time. Post-construction, monitoring and reporting on stormwater outfalls will be required. Stormwater treatment structures and associated buffer zones as well as landscaping integrated with the conveyance system of stormwater will be owned and managed by the property owner.

Further information on site topography, soils and water resources and storm water management for the Project is included in Sections 3.1 and 3.2 of the DGEIS.

### Public Comments

Commenters stated that the GEIS should be supplemented with additional information on the “preferred stormwater management techniques” for the site. It is noted that the document does not include a comparative assessment of potential stormwater management options and performs no calculations or analysis of flow volumes, elevations, depth to water table, or other relevant site characteristics. One commenter recommended that preferred stormwater management techniques be incorporated in a “preferred SWPPP” that can act as a template for future development. Another stated that a master plan for stormwater management over the entire site should be developed to ensure water quality is protected if the property is developed by multiple project sponsors.

Many comments noted the site contains poor soil conditions for stormwater management and stated that the GEIS does not clarify what type of engineering and design practices would be needed to overcome this limitation and allow for proper stormwater management and treatment. It was stated that additional detail should be provided to show how stormwater impacts will be evaluated and mitigated.

There was also concern about “hazardous pollutants” in the on-site soils and potential leaching of these soil pollutants into the stream and wetlands on-site and stormwater flowing to the Susquehanna River. It was also noted that the GEIS does not address whether green infrastructure (permeable pavers, bioswales, rain gardens, etc.) and low impact development techniques will be utilized by potential applicants, or state how water quality will be monitored in the streams and wetlands on the property.

Other commenters expressed concerns about flooding on the property and noted an increase in severe storm events. They also stated that there will be an increased risk from flooding if the site is redeveloped.

### Response to Public Comments

As part of this GEIS process, the lead agency is not conducting any further study of stormwater issues at this time. As stated in the GEIS, when and if a site-specific project is proposed, the project sponsor will have to apply for a SPDES General Permit, Storm Water Discharge from Construction Activity (the “General Permit”) or obtain an individual SPDES permit, dependent on the site-specific redevelopment plan proposed. The current general permit was issued in 2015 and expires in 2020. Every five years the permit is updated to reflect the current treatment technology and science. The current general permit establishes a hierarchy of minimizing impervious surfaces, maximizing green infrastructure, maximizing infiltration, minimizing construction on steep slopes, and establishes treatment and control requirement for flow, turbidity and other parameters. The general permit requires a comprehensive storm water pollution

prevention plan (SWPPP) that demonstrates compliance with all of the above conditions for both storm water during construction and storm water post construction. A SWPPP is dependent on site-specific information such as the actual location of buildings and pavement, information that is not available at this time. The general permit is intended to incorporate all the best available affordable practices for minimizing stormwater impacts including erosion and pollutants. It is not uncommon for the requirements of the General Permit to ultimately control the size and design of a development project.

When and if a site-specific project is proposed, the project sponsor will also have to comply with the City of Oneonta Floodplain Law. In order to qualify for federal floodplain insurance, the City of Oneonta had to adopt a Floodplain Law that is as least as stringent as the model law published by NYSDEC. The City of Oneonta Floodplain Law incorporates the latest 100-year floodplain maps issued by FEMA. That law prohibits structures in the Floodway and requires site specific permits for new structures in the 100-year Floodplain. The City of Oneonta Floodplain Law also includes restrictions on alteration of watercourses that may impact flooding. This restriction may apply to stream and wetland resources identified on the Rail Yard site. In addition, the City of Oneonta is in the process of developing a Comprehensive Plan and Otsego County is updating its Hazard Mitigation Plan, which will include a section on flooding.

### **Wetlands**

Section 2.3.8 and Section 3.3.1.2 summarize wetlands information for the rail yard redevelopment as follows; Wetlands have been preliminarily delineated within the project area and require confirmation by state and federal regulatory agencies at the time a site-specific development plan is brought forward. While the final site-specific development plan will determine the total disturbance of regulated wetlands, it is expected that impacts may be substantial and could exceed 8 acres of wetland and wetland buffer area, associated with either natural or manmade drainage features.

The Freshwater Wetlands Act (ECL Article 24) recognizes that wetlands provide a variety of functions and benefits important to the people and environment of New York. The Act requires that wetlands be preserved and protected “consistent with the general welfare and beneficial economic, social and agricultural development of the state”. Activities within 100 feet of a regulated wetland are also regulated if they impinge upon or otherwise substantially effect the wetland. Development activities must seek to avoid impact to wetlands, minimize impact if avoidance is impossible and then mitigate those impacts that cannot be avoided. A proposed project that will impact a wetland must obtain a permit.

The stream and wetlands within the former rail yard site provide the service of water transportation and flood attenuation. Stormwater management will be designed to maintain as much of the Study Area's natural hydrology as possible. Due to the Study Area's history as a Rail Yard, many of the on-site wetlands have been impacted by past land use actions. There is potential for some restoration of the wetlands on the Study Area outside of the areas intended for redevelopment.

As mapped by NYS DEC Environmental Resource Mapper, there are two identified State regulated freshwater wetlands, ON-7 (29.6 acres) and ON-9 (28.3 acres), both Class 1, within the Study Area north of Roundhouse Road. The wetlands are considered Class 1 as they are "tributary to water that could subject the developed area to flooding". The area is also mapped in the National Wetland Inventory (NWI) as freshwater forested/shrub wetlands (PFO1E – palustrine forested broad-leaved deciduous seasonally flooded/saturated) of 11.7 acres, with a mapped 0.12-acre freshwater pond at the northwest side of the wetland.

The Study Area wetlands were preliminarily field delineated for this GEIS, the results of which are shown in Figure 3.3. The results indicate there are approximately 26.9 acres of potentially federal jurisdictional wetlands within the proposed Master Plan area. The wetlands report is included in the DGEIS in Appendix A.

The wetlands include wet meadow as well as forested wetlands. Water enters the wetlands through the toe of the hillslope north of the Project site, and from the wetlands to the east of Fonda Avenue. Existing disturbance to the wetlands includes the site's history as a railyard in which a stream and several wetland areas were ditched to convey water off-site, while other areas were filled to create work areas or rail spurs in various locations around the site. Disturbance on this site also includes a preponderance of the invasive plants glossy buckthorn (*Frangula alnus*), Tartarian honeysuckle (*Lonicera tartarica*), common reed grass (*Phragmites australis*) and knotweed (*Polygonum cuspidatum*), among others.

### Public Comments

Many commenters state that they favor "ecologically sensitive" development that "respects" on-site wetlands. It is noted the "preferred alternative" includes 900,000 sq. ft. of building area that would directly impact wetlands and buffers. These wetlands are identified as Class 1 wetlands which are critical to flood mitigation, sequestration of soil "toxins", and protection of wildlife habitat. There is a concern that nearby neighbors will be negatively impacted by flooding and increased runoff containing toxic chemicals if these wetlands are filled. Many commenters expressed a concern that the value of the wetlands for the ecosystem in terms of water quality and flood management have been understated in the GEIS. It was also noted that

wetland delineations included as part of the GEIS have not been confirmed in the field by state and federal agencies.

Public comments acknowledge that wetland mitigation will be required if wetlands and buffers are impacted by development and a project sponsor's reasons for choosing a particular mitigation strategy will be documented as part of the permitting process. However, many commenters state that mitigation of wetland impacts needs to be more closely addressed and specific plans, thresholds or requirements for wetland mitigation and monitoring should be provided in the GEIS. At least one commenter recommended that the Lead Agency develop a preferred wetland restoration and monitoring strategy as part of the GEIS that future project sponsors will be required to follow.

Other commenters stated that the value of the wetlands for the ecosystem in terms of water quality, flood attenuation and wildlife habitat have been understated in the GEIS, and that a plan that avoids direct wetland impacts (such as Option 4) should be the preferred alternative.

#### Response to Public Comments

As part of this GEIS process, the lead agency is not conducting any further study of wetlands or stream issues. When and if a site-specific project is proposed, the project sponsor may have to apply for a permit from NYSDEC under the freshwater wetland act (ECL article 24), an individual or nationwide permit from the United States Army Corps of Engineers, and a stream disturbance permit from NYSDEC as well as comply with any applicable local laws. In order to obtain a permit to conduct activities within a regulated wetland or buffer area, the applicant must demonstrate that it has avoided impacts to the regulated wetlands to the extent possible, minimized the impacts if avoidance is not possible and mitigated those impacts that cannot be avoided. The Army Corps requirements are essentially the same.

The DGEIS estimated that the full buildout scenario (Option 3) had the potential to impact as much as 8 acres of wetlands and buffer area, as well as associated natural man-made drainage features. Option 4 was included in the DGEIS as an example of a redevelopment design that would have less of an impact on wetlands. The objective of Option 3 was to describe a full buildout scenario for which wetland permitting and mitigation would be a project limitation. The existing state, federal and local wetland laws will control the size, design and location of any future development on this site. Given the uncertainty associated with those permit processes, a potential developer would be well advised (and will be legally required) to avoid wetland disturbances to the extent possible.



### **Former Site Use Impact**

Section 3.2 describes the soils and groundwater results from the 2006 Phase II Environmental Site Assessment Report, completed under the USEPA Brownfields Assessment Program. Site sampling and analysis was not carried out as part of the GEIS process. The 2006 Phase II Report included 18 soil sampling locations, 19 sub-surface soil sample locations, 8 sediment sample locations, and 14 groundwater samples taken at sub-surface soil locations. The samples were analyzed for volatile organic compounds, semi-volatile organic compounds and metals. The conclusion from that study, after analytical results were compared to NYS Soil standards, was that neither further investigation nor remedial activities appeared to be warranted.

### Public Comments

Many commenters expressed concerns about groundwater and soil contamination in the study area. It is stated that the property's historic industrial use and known contamination should have prompted the Lead Agency to perform a "proper analysis of soil contamination" as part of the GEIS process. It is noted that "mixtures of hazardous chemicals" should be regarded as more potentially harmful than individual components. The potential loss of wetlands which currently work to "sequester" toxins was also cited as a concern.

It is stated that potential air and water quality impacts to neighboring residents, an Environmental Justice community, impact to construction workers, and a future work force associated with on-site contamination have not been addressed. It is stated that redevelopment at the site may cause significant health impacts as people who live and work downwind of the site would be at risk of inhaling fine particulate matter. Potential harm in the form of respiratory and cardiovascular diseases, neurological and developmental diseases, and cancer was noted. At least one commenter questioned the GEIS conclusion that further investigation or remedial activities did not appear warranted and stated the conclusion was without scientific merit.

Several comments stated the DGEIS fails to explain how property owners will be required to clean up the construction debris, fill material and trash that is currently located on the site and lacks a clear commitment to pursue a full cleanup and remediation of the site. Many commenters referred to the site as a "brownfield" and asserted it should be remediated or "abated" before it is redeveloped. The availability of funding or tax credits under the NYS Brownfields Program was noted to provide for the assessment and removal of existing structures on the property. One commenter stated the City received an "EPA Brownfield Grant" in 2003 and questions whether public input

has been solicited in accordance with the terms of that award. Another commenter stated the desired status of completing an Empire State Shovel Ready Certification should be acknowledged in the GEIS.

#### Response to Public Comments

As part of this GEIS process, the lead agency is not conducting any further study of the groundwater or soil quality. According to recommendations of the 2006 Phase II Environmental Site Assessment Report, which was completed under the USEPA Brownfields Assessment Program, some analytes detected may be typical background concentrations for an urban area, and based on the magnitude and distribution of analytes exceeding standards, further investigation or remedial activities did not appear to be warranted (Phase II Report, page 6-3).

When and if a site-specific project is proposed and/or a potential buyer/tenant is found, the project sponsor (or buyer) will be provided a copy of the FGEIS (which includes the public comment) and the 2006 Phase II Report. As part of that transaction, the project sponsor (or buyer) will make a determination whether there is a need to conduct further investigation to determine the potential impact of the soil and groundwater conditions on the proposed project development. If a contamination issue is identified, either the property owner and/or project developer will work with NYSDEC to complete the necessary investigation and remediation. NYSDEC has a variety of tools (e.g., Brownfield Program, Inactive Hazardous Waste Program, Spill Program and Municipal Brownfield Program) to address any such issues.

As established in DEC Commissioner Policy 29, Potential Environmental Justice Areas are US Census block groups of 250 to 500 households that have populations meeting or exceeding statistical threshold in the percentage of the populations reporting themselves as a member of a minority group or having household income that is below federal poverty levels. The rail yard itself is not mapped as a Potential Environmental Justice Area, but areas within the Town and City of Oneonta are mapped as such. Commissioner Policy 29 provides guidance for incorporating EJ concerns into DEC permit review processes and enhancing public participation requirements in EJ communities. At such a time when a site-specific development is proposed, and the DEC permit process is begun, CP-29 provisions will include EJ provisions as applicable.

#### **Habitat**

The threatened and endangered species information provided by the US Fish and Wildlife Service is attached as Appendix E to the GEIS. That information was summarized in section 3. 3. 1. 3. entitled

“Habitat”. The conclusion was that no critical habitat was found to be within the project area. However, as noted in Section 3.3.3, the Northern Long-Eared Bat (NLEB), a threatened species, may be found in the region and the DEC has specific requirements for projects within NLEB habitat. These requirements would be followed if NLEB were to be found on the rail yards.

### Public Comments

As stated previously, many commenters stated one important function served by the on-site wetlands is the protection of wildlife habitat. One commenter stated the property is a “stop-off” for Canadian Geese migration. Another commenter noted Canadian Geese are not an endangered species and bring e-coli. A majority of the comments received stated that any development should be done in a manner that is ecologically sensitive and “respects” birds and animals as well as the surrounding community. One commenter also stated that fish habitat should not be impacted.

### Response to Public Comment

As part of this GEIS process, the lead agency is not conducting any further study for threatened and endangered species. When and if a site-specific project is proposed and/or a potential buyer/tenant is found, the New York State Department of Environmental Conservation will make a determination on the need under Article 11 of the ECL to conduct a further habitat investigation. Under Article 11 of the ECL, any action that has the potential to have a negative impact on a potential habitat for threatened or endangered species is prohibited unless a taking permit is issued by DEC authorizing the taking and requiring full mitigation.

### **Process/Procedure**

The lead agency for this GEIS is the City of Oneonta Common Council. The project sponsor and funder is the property owner County of Otsego Industrial Development Agency (“COIDA”). The Draft Generic Environmental Impact Statement (DGEIS) was prepared in accordance with Article 8 of the New York Environmental Conservation Law, the State Environmental Quality Review Act (SEQRA or SEQR) and the implementing regulations incorporated in 6 NYCRR Part 617. The DGEIS was prepared to document the environmental review of the potential redevelopment of the rail yards and to seek comments and input from the public and involved and/or interested agencies.

### Public Comments

Many commenters expressed concern that the Lead Agency has engaged in improper segmentation. It is noted that certain circumstances may warrant segmented review but that the Lead Agency's determination of significance and GEIS did not state the reasons supporting why a segmented review was appropriate in this case or demonstrate that such review would be no less protective of the environment. It is also stated that deferring consideration of environmental factors, including planned development of energy infrastructure, brownfield remediation, wetlands protection, stormwater control, road alterations, and issues associated with future permit applications to other agencies is improper.

It is stated that the infrastructure "required" or "necessary" to provide service to the site are either not mentioned or sufficiently addressed. Many commenters state the GEIS should identify and analyze the potential impacts of any plan to provide "an adequate gas supply . . . (e.g. a decompressor station and a CNG trucking plan or an expansion of the DeRuyter pipeline)". Others commented that plans for the extension of other utility infrastructure, such as public water and sewer systems, and site roadways were not adequately addressed. Commenters identified these as "related actions" that should be discussed and analyzed to the fullest extent possible.

It is noted that the GEIS contemplates that redevelopment will occur in phases, however, it is stated that the submission of the EAF in 2017 has precluded a review of the potential adverse cumulative impacts associated with projects that were proposed after the EAF was submitted, including a proposed CNG decompressor station in the Town of Oneonta. Public comments note a Consolidated Funding Application (CFA) for The CNG project has been denied, but argue statements made by the Applicant in public proceedings and in the CFA application have created a "connection" between natural gas development and the redevelopment of the Rail Yard site. For this reason, it is stated the proposed impacts of natural gas development must be considered by the Lead Agency as part of the GEIS.

It is also noted the Otsego County Board of Representatives has recently announced creation of the Otsego County Energy Task Force to identify current and future energy needs, including identification of strengths and weaknesses of current energy infrastructure, and will develop a plan for meeting energy needs in Otsego County. At least one commenter noted it was imprudent for the Lead Agency to undertake review of this project while this county-wide effort is underway. Another comment noted the Lead Agency is currently developing a new Comprehensive Plan which should be completed before it considers the GEIS.

At least one commenter also stated the GEIS did not provide a sufficient analysis of alternatives which could reduce adverse environmental impacts. It is stated the only alternatives considered in the GEIS were for potential building site plans, but there is no substantive analysis of site characteristics or potential impacts provided with respect to each alternative that takes into consideration wetland protection or the feasibility of different stormwater designs. Comments note there is also no analysis of alternatives to industrial development, such as high-tech or information-based uses. With respect to energy supply, it is noted that different options are identified, however, comments state the GEIS discussion of these alternatives provides no substantive analysis comparing the applicability, cost, or environmental appropriateness of the identified options and states no “preferred alternative”.

At least one commenter also stated the Lead Agency should ensure better coordination with the Planning Commission in the development of the Final GEIS to ensure that the Planning Commission has the capacity to fully and fairly review any subsequent site plan applications and to ensure that the mitigation measures that are ultimately implemented are done so consistently over the course of a multi-year redevelopment plan.

It is noted that the conceptual plans listed in the DGEIS are not consistent with other plans listed on the Applicant’s website, including the 2016 Clark Patterson Lee Report, the “Preferred Site Options” document, and the “Oneonta Railyards Fact Sheet”. It is recommended that the Applicant’s website be updated to reflect only the most current conceptual plans being considered by the Lead Agency.

Finally, it is noted that the NYSDEC’s recently revised SEQRA regulations require an EIS to detail strategies to mitigate a project’s likely contributions to climate change. It is stated that the proposed redevelopment will result in additional GHG emissions and “may be vulnerable to the hazards brought about by climate change”. It is stated that the GEIS fails to address these new requirements and does not give adequate consideration to the impacts of climate change.

### Response to Public Comments

The goal of the owner of the property (COIDA) is to create a location in which future businesses/institutions will create new jobs and add to the local tax base. The master plan evaluated in the GEIS focused on potential industrial/commercial uses including food processing, brewing/manufacturing, packaging, warehouse/storage, temperature-controlled distribution, import and export. Those uses were identified based on a perceived need and suitability for such uses, access to both highway and rail for transportation of goods, and proximity to existing agricultural resources. The actual future redevelopment of the property may be for entirely different use provided such plan achieves the objectives of creating new jobs, adding to the local tax base and obtains all state, local and federal approvals.

At least one commenter stated the GEIS did not provide a sufficient analysis of alternatives which could reduce adverse environmental impacts. One of the purposes of the GEIS is to identify the site-specific limitations/development constraints. Several Options were created and presented in the DGEIS. Most of the conceptual Options were not developed further as their adverse environmental impacts were too large for a project of that size to be permitted by several involved agencies, making them unrealistic Options. The Option chosen for the Master Plan was deemed a potentially realistic re-development full buildout which could be utilized to identify site limitations. Option 4 was included to illustrate how a smaller project foot print could avoid some of those limitations.

The two most significant site limitations/constraints identified are the extensive regulated wetlands and lack of existing infrastructure for electricity and natural gas. Appendix A to the GEIS contains a Wetland Delineation Report; Section 3.3 described the wetlands and the applicable limitations to disturbing those wetlands. Section 2.3.5 (entitled “Power”) describes the electrical and natural gas services available to that site and provides an estimate of total connected load and total BTU/year for the full buildout Option chosen. Section 3.6.2.6. describes the improvements necessary to the transmission system to provide the project area with electricity to support a theorized 7.7 MW load, and recommends the future consideration of alternative energy sources. Section 9 entitled “Effects on Use and Conservation of Energy” identifies the potential for conservation measures and on-site renewable energy sources and funding sources.

NYSDEC’s recently revised SEQRA regulations require an EIS to detail strategies to mitigate a project’s likely contributions to climate change. It was not possible for this GEIS to detail strategies to mitigate a project’s likely contributions to climate change, as there is currently no project-specific plan. It would be premature to establish energy related mitigation measure for an unknown project at an unknown time for an unknown energy supply system. As stated in the public comments, the county has established a fact-finding panel to investigate/evaluate the energy needs and alternatives for the county. It is possible that a proposed redevelopment will have the potential to result in additional GHG emissions and may be vulnerable to the hazards brought about by climate change. Planning for the mitigation for any future GHG emissions and hazards related to the site redevelopment will occur when there is an actual re-development proposal. As part of any site-specific project approval process (including SEQRA), issues related to energy use, greenhouse gas emissions, and availability of renewable energy will have to be evaluated by the Lead Agency and/or the other involved agencies based upon conditions and circumstance at that time and the proposed use. Based upon the public comments to the DGEIS, any future project sponsor or involved agency is informed about the need to take action to combat climate change and the public support for such action.

**ATTACHMENT A**

Public Comment Log

	Date of Comment	Commenter	Comment
1	3/15/2019	Laura G. Malloy, Ph D.	My name is Laura Malloy. I hold a Ph.D. in Physiology from the Physiology Department at the University of Virginia School of Medicine and have completed post-doctoral work supported through the National Institutes of Health in the Pharmacology Department at the University of Vermont. College of Medicine and am now Professor Emeritus in research. I have published scholarly work on cardiovascular function, receptor pharmacology, and congenital malformations of the heart. Thus, I am well qualified to evaluate the DGEIS from the point of view of a scientist conversant with appropriate experimental design, data analysis and statistics and I am a professional expert prepared to comment on the health and environmental risks Biology from Hartwick College in Oneonta, N.Y. I have taught courses in physiology, pharmacology, toxicology, energy and resources, and public health. I have over 30 years of professional experience associated with industrial development, natural gas, and wetlands disruption. I am also a lifelong resident of New York State and a former councilwoman for the Town of Laurens. I understand well the values and culture of central New York.
2	3/15/2019	Laura G. Malloy, Ph D.	My primary concerns regarding the DGEIS center on two issues: the use of natural gas as an energy source and wetlands disruption. Both of these actions have the potential to release of combinations of toxic chemicals into the water and air of our region. They are substantial risks because exposures will be to multiple contaminants from different sources: gas transfers\ vehicle emissions, and sequestered toxicants left behind from years of industrial activity at the rail yards. The development of this site will lead to simultaneous exposures to multiple contaminants for some individuals, and it will be difficult to predict who will be exposed or how much exposure will occur. A person's response to exposure is affected by individual vulnerabilities - based on age, size, inheritance and personal history. Exposure is affected by local weather patterns, watershed structure. and animal and plant activity in the area. Simply measuring the average of a chemical or chemicals over time without accounting for acute spikes in concentration obscures the exposures for workers and neighbors who happen to be near the site on the days that spikes occur. Similarly, the average amount of chemical over area can obscure the exposures for those who happen to be closer to the origination site of chemical release. Of most concern it that there is very, very little data on what occurs when individuals are exposed to combinations of toxicants. However, it is known that exposure to each of NO2. CO, VOCs, Formaldehyde, heavy metals and particulate matter, all of which are present in and around the Rail Yards, can cause respiratory and cardiovascular diseases, neurological and developmental diseases, and cancer. In combination risks are at least additive and may be geometric - we just don't know.
3	3/15/2019	Laura G. Malloy, Ph D.	1. The DGEIS identifies gas as the type energy required for the Rail Yard development but it does not provide a rationale for the necessity of using this particular type of energy source (a non-renewable greenhouse gas, over 80x more potent than Co2 over a 20 year time period), nor does it, as required by law, assess its impacts as an energy source at local and regional levels or at sites upstream and downstream along the watershed. Any rationale for gas as energy source needs to demonstrate how its use would be superior to renewably generated electricity to meet the needs of the project when its impact assessment is taken into account Why is natural gas the energy source of choice at this point in time and what will its impacts be on the environment and the health of the local population?
4	3/15/2019	Laura G. Malloy, Ph D.	2. The infrastructure required to provide an adequate gas supply for Rail Yard development (e.g. a decompressor station and a CNG trucking plan or an expansion of the DeRuyter pipeline) is neither mentioned nor assessed for impact at local or regional levels in the DGEIS. This is an instance of illegal segmentation. Why has this aspect of development been excluded from the assessment?



5	3/15/2019	Laura G. Malloy, Ph D.	3. The current plan and technical drawing in the DGEIS includes buildings impinging on sensitive class1 wetlands. These types of wetlands are the most critical to flood mitigation on toxin sequestration/bioremediation and protection of wildlife habitat. Given that our area has had major flooding issues in the past and expects more in the future. disruption of this area could increase the risk of flooding damages and release of the toxic materials already known to be accumulated in the area as a result of the long-standing rail yard activities. What is the rationale for locating the buildings in the least advantageous place for protecting the neighbors?
6	3/15/2019	Laura G. Malloy, Ph D.	4. The DGEIS fails to identify impacts and suitable mitigation for increases truck traffic, lights, noise, odor, and pollution that inevitably accompany industrial applications. How can locals prepare at adapt to this kind of development if the developer is not required to address these concerns honestly? It places an unfair burden on the local community if they must finance impact studies themselves in order to determine appropriate mitigation. It is, after all, the developers who stand to profit from the development.
7	3/15/2019	Laura G. Malloy, Ph D.	5. The DGEIS omits a specific attention to impacts on vulnerable populations such as children, the elderly, and the infirm. Further, impacts on other segments of the local population who regularly pass, cross, or are exposed to this space (pedestrians, bicyclists, school children getting on and off of the bus, and small children playing in front yards) have not been addressed. This is a concern for health and safety for our whole community. Why were these special populations not considered?
8	3/15/2019	Laura G. Malloy, Ph D.	6. The town of Oneonta has been omitted from the SEQR/ DGEIS review process, yet tractor trailers and other traffic will of necessity pass through the town in order to access this development from the interstate What is the rationale for splitting the needs of the town from the needs of the city when it comes to the environmental impact of a project whose stated goal it to alter both the economy and the infrastructure of the entire region?
9	3/15/2019	Laura G. Malloy, Ph D.	Let me say in conclusion that I find the current plan for the Rail Yard development to be ill conceived and poorly planned. A more economically viable approach would be future directed and technologically sophisticated and would recruit industry interest first to determine real needs, rather than planning soon to be outdated infrastructure for as yet unidentified industries. This is not a time for "if you build it. they will come"
10	3/14/2019	Katherine O'Donnell, Ph.D.	Legerdemain-sleight of hand I am a resident of the Town of Oneonta. Recently, I was at the Plains Retirement community talking with Town of Oneonta residents about their concerns regarding the proposed gas decompressor plant and tractor trailer truck delivery of fracked, CNG from PA. I turned to the topic of the proposed railyard development project with its mysterious gas energy source and a woman turned to me and said, oh, but we don't have to worry about that because it is in Oneonta.
11	3/14/2019	Katherine O'Donnell, Ph.D.	This concerned citizen's response reveals a major problem. The connection between the railyard project's preferred but unexamined energy-gas- and the proposed gas decompressor plant in the town of Oneonta has been obscured. Gas, and its GHG environmental impact, are unanalyzed in the GEIS. At best, this is incomplete, at worst, fraudulent- an official legerdemain. I ask you from where will the gas come?
12	3/14/2019	Katherine O'Donnell, Ph.D.	In 2018, OTSEGO NOW/IDA plan proposed a 25% increase in gas use in our area, a gas decompressor plant, and trucks bringing in fracked gas from PA. It would involve a \$17. 5 million price tag for our taxpayers, an increase in the amount of GHG that we put into the atmosphere, and a cost to the community in health and safety as well.

13	3/14/2019	Katherine O'Donnell, Ph.D.	1. Is the proposed gas decompressor plant the source of the preferred energy-gas-for the railyard project?
14	3/14/2019	Katherine O'Donnell, Ph.D.	2. Is a gas-fueled microgrid for electric generation planned at the railyard site?
15	3/14/2019	Katherine O'Donnell, Ph.D.	3. Will the rail line be used to transport fracked gas waste?
16	3/14/2019	Katherine O'Donnell, Ph.D.	To continue to hide the relationship between the intended expansion of gas infrastructure in the town and the railyard project is illegal segmentation.
17	not dated	Otsego 2000, Inc.	For the reasons set forth below, the DGEIS is seriously flawed and is in fact a "ghost." Notwithstanding that it is over 110 pages, with headings, tables, and repeated references to environmental buzzwords, it is entirely lacking in substance.
18	not dated	Otsego 2000, Inc.	The DGEIS fails to supply necessary standards and thresholds concerning which subsequent actions would require future environmental review, an adequate discussion of a reasonable range of alternatives to the project and its future phases, cumulative impacts analysis, or any requirements for mitigation of identified impacts.
19	not dated	Otsego 2000, Inc.	The applicant, the County of Otsego Industrial Development Agency ("COIDA") appears to be seeking to shortcut subsequent site-specific environmental reviews by proceeding through an insufficient "generic" process in violation of the New York State Environmental Quality Review Act ("SEQRA").
20	not dated	Otsego 2000, Inc.	Factual inconsistencies and omissions in the DGEIS are pervasive and significant. Among the most notable omissions are related proposals disclosed by the same applicant, COIDA, to construct extensive energy infrastructure to support the project. The DGEIS fails to address or even include plans disclosed by COIDA in its CFA application submitted on July 26, 2018 to build a \$17.5 million compressed natural gas ("CNG") decompressor station in the Town of Oneonta, supplied by daily deliveries of CNG in heavy tractor-trailer trucks, a \$50-100 million expansion of the DeRuyter pipeline to supply gas to the Railyards project, and miles of pipeline which will be needed to connect the DeRuyter and/or decompressor station to the Railyards site.
21	not dated	Otsego 2000, Inc.	More recently, COIDA has discussed plans for a power plant to be sited at the Railyards to supply electricity to the site. None of these plans were disclosed until after the adoption of the Final Scoping Document for the Railyards project and after public comment on the Scoping Document was closed.
22	not dated	Otsego 2000, Inc.	The Mayor of Oneonta has stated by letter, dated October 15, 2018, that he was "entirely unaware" of the gas infrastructure being proposed by COIDA until after the Scoping Period was closed. The DGEIS must be revised to take this new information into account and correct the many other errors and omissions discussed herein.

23	not dated	Monique Erlichman	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyards an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
24	not dated	Dorothy Fielder	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyards an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies. <i>"This would be a chance to be a good example for positive impact on climate change."</i>
25	not dated	Marjorie Pietraface	I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
26	not dated	William Pietraface	I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
27	not dated	Mary & Richard Breuninger	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyards an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
28	not dated	Linda Ryder	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyards an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
29	not dated	William Guest	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyards an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.

30	not dated	Beverly Guest	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyards an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
31	not dated	Sandra Fritsch	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyards an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
32	not dated	Stephen C. Paranya	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous <i>"in several ways"</i> . I do not want heavy industry and its accompanying gas infrastructure build out at the railyards an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies. <i>"It is well known that carbon emissions are increasing on the planet and our Country is the main contributor. We cannot safely continue to expand the use of gas. We are loathe in supplementing gas and other fossil fuels with sun, wind, and geothermal energy. A comprehensive plan to use renewable energy will do better in the further rather than increase our use of fossil fuels."</i>
33	not dated	Kathy E. Hilts	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyards an area surrounded by residential neighborhoods.
34	not dated	Linda Shea	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyards an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
35	not dated	Jan Bowers	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyards an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.

36	not dated	Joseph M. Fodero, Ed. D.	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. I do not want heavy industry and its accompanying gas infrastructure build out at the railyards an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies. <i>"However the energy is developed, make certain the inhabitants do not get harmed."</i>
37	not dated	Tammy Hilts	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyards an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
38	not dated	Anonymous	<p>Local residents, nonprofits, municipalities, business and industry <b>embrace</b> green, renewable energy sources wherever it can be implemented and it is reliable, practical and economically makes sense. Forcing renewable energy on anyone or any entity is not the answer and will cause many more residents and businesses to exit from the area. Most county residents "squeak out" a living - there is not a lot (if any) disposable income. How many of our local residents can afford solar, geothermal or an air heat pump system? These systems may cost them upfront upwards of \$30,000+/- with a payback period of up to 10 years and grants of up to \$5,000+/-.</p> <p>Natural gas, in the areas that it is available, helps many local residents be able to afford their heating costs. Natural gas is the cleanest, most efficient form of fossil fuels today. To protest the use of natural gas is ignorant, irrational and short sighted. It is unfortunate natural gas is not available to all county residents. Many of our county residents and many businesses have to rely on fuel oil or other dirtier forms of energy. The local hospital, several businesses and the colleges have to rely on fuel oil when NYSEG shuts them down in peak energy periods. Business and industry supports every community, if we do not sustain our economic engine, employment opportunities will continue to dwindle and as a result our area will continue to shrivel and shrink. As the area shrinks - less tax payers - mean local taxes continue to increase on those that remain. School enrollments will continue to shrink - stressing the economic viability of schools as much of their state funding is based on enrollment numbers. Those remaining in the area will be faced with even more unmanageable school taxes. We are all aware how overall taxes are becoming a major burden and unaffordable to many. No matter who you are employed by - you need business and industry - they provide production, products, and fund pension plans both public and private. Fossil fuels currently are critical energy sources – renewable technology is not yet in place to just flip the switch to all green renewable energy across the board.</p> <p>All the "green only" activists should stop trying to block business growth in the area and cripple existing businesses by: trucking people in from out of the area to extrapolate propaganda; disrupt/hi-jack public meetings; and force their "green only" beliefs on others- especially when the majority of these activists are hypocritical. Until the "green only" activists are totally "green only" themselves - they should <b>not</b> force their opinions and unaffordable options on others. Questions every "green only" activist should <i>honestly</i> answer are:</p> <ul style="list-style-type: none"> <li>• How do I heat my home?</li> <li>• What do I drive?</li> <li>• What is the source of electricity to my home?</li> <li>• What is the source of heat and energy for my employer?</li> </ul> <p>If the "green only" activists truly want to make the area more environmentally friendly they need to put their efforts into Action instead of protest, frivolous lawsuits, personal and professional threats:</p> <ul style="list-style-type: none"> <li>• The Springfield and Cherry Valley areas are cited as great for wind farms -work on attracting and constructing wind power in these areas.</li> </ul>

			<ul style="list-style-type: none"> <li>• Otsego Lake was noted at the Energy Summit as a great source for geothermal - work on using this great water source to provide geothermal to the municipality, hospital and school.</li> <li>• The fields around Cooperstown were noted to be excellent for a solar farm - work on identifying the best location and bring a solar farm to the area.</li> <li>• Cudos to the Oneonta area - they are investigating geothermal, a solar farm has been located in Laurens area and they are exploring other options ... Action- Not Protest.</li> <li>• NYS and the US are already heavily environmentally regulated - we are not the polluters causing climate change - the "green only" activists need to focus their protest on the sources of major pollution overseas instead of crippling our local economy and creating financial hardship for our residents.</li> </ul> <p>Renewable technology is constantly being developed and finessed, however, it is not at the point where fossil fuels can be cut off. Our area needs to bring <b>common sense</b> back to the table. Our area does not need protests and activists trying to force their policy and platform on our residents when there is much misinformation being circulated. <b>The "green only" actions further destroy the economic viability of our residents and businesses. Remember businesses are the economic engine providing our residents, nonprofits and municipalities with the ability to exist.</b></p> <p>-anonymous</p> <p><i>The attached is being submitted anonymously due to the nefarious, attacking practices of the "green only" activists, whom, if you disagree with their statements and/or opinions - attack the individual, business, and/or employer(s) to try to personally and professionally destroy them. Their tactics are also used to intimidate and discourage anyone else from speaking out against them. It is an unfortunate reality our area is dealing with - is this what we want for our area, county, state or nation?</i></p>
39	3/14/2019	Louise Leary	<p>I was dismayed at all the opposition to increasing the natural gas supply to accommodate and entice new business to the city. In Oneonta we are very lucky to have natural gas. It is the cleanest and lowest cost of all fossil fuels. Anywhere gas lines go in, real estate values go up. It is the recommendation of the engineers here. The alternate fuels such as solar, wind and geothermal are just not feasible. They all take large areas, and can be unreliable. Geothermal costs around \$25,000 for a single house and requires, it looks like, and acre or two of underground pipes. Most of the respondents lived out of the city, and just opposed development based on global warming. (A science that is still in debate) Give me a break!!! Reminds me of Oneonta's past where they didn't want IBM here. Or OAC's protest of Amazon bringing its headquarters to NYC. I wonder if these people drive cars! Nobody's opposed to environmental considerations, but within reason. This land is a very valuable area for Oneonta since the city is limited in space for development. We want to bring business, to bring jobs and increase revenue. Much of the city is occupied by non tax schools etc. Its so disheartening to see just a few extremists derail the project that most of the people of the city would overwhelmingly support. When opened to public opinion I don't think these few that showed up at the meeting represent the people of the city. I believe it should go to referendum to get a true picture. One other environmental factor beside global warming that was brought up was the "wetlands" for Canada Geese. These are not endangered species, they can bring e-coli, and are considered sometimes pests. I believe they would find another place or the city could buy other land to flood. The point is that this is such an important few acres for the city, and we are otherwise mostly surrounded by woods and farmland. I think its dishonest to oppose any development when the righteous here live in moderm houses, and enjoy the benefits of our industrial expansion, scientific discoveries etc over the decades including air travel, cars and the like. Just to add to the gas supply, you would think they were opposing the construction of a steel mill.</p>

40	not dated	Paul Agoglia	<p>Send Our Money to Farmers and Landowners, Not Penn Fracked Companies  Why send money for fracked gas to Pennsylvania when we can look into paying farmers and other landowners who have property where there is enough wind to install wind mills? In addition, any structures placed on site in the railroad yard can be designed so that commercial size solar installs can be done on the roof(s). The wind sites might be in Otsego or Delaware County or they might be a distance away. Oneonta City and Town would buy into the windmills. If indeed the wind mills are a distance away, I am sure the power generated can be 'bumped' toward our area easily enough. Also, build it right. The project as it stands now at 900,000 square feet does not give renewable energy a fair shot. Create a smaller project that can be scaled up at a later date. Include geothermal, wind and solar, along with electricity storage (such as molten salt batteries) in the initial smaller construction. Solar and Wind are already cost competitive with natural gas. In a few years, storage will be resolved and at that time the project can be scaled up. According to Clean Technica today (March 18, 2019) by 2023 the US market for battery storage of electricity will soar to \$3.8 billion. Also, by 2025 there will be 35GW of energy storage in batteries in the US, compared to 1.223GW hours in 2019. So it seems that either planning for nonrenewable with the expectation of storage being available or waiting a bit longer to break ground are two viable options to rushing to use gas, a fuel expected to increase in price. Remember, as solar and wind continue to scale up, their prices will continue to drop. The price of fracked gas on the other hand will go up as it loses favor, as Usher shows in his book.</p>
41	not dated	Rob Baum	<p>I live at the corner of Parish Ave and West Broadway. I have some serious concerns surrounding development in the railyard. I read that the area is considered a "brown" zone.</p> <ol style="list-style-type: none"> <li>1. The fallout from any cleanup that would have to take place would be right on my back yard.</li> <li>2. Natural gas seems to be the only source of fuel considered for development. That can only come from 2 places: a line from the proposed decompression station (I'm against that) or extending the existing line.</li> <li>3. The mitigation of the wetlands needs to be more closely addressed.</li> <li>4. I don't see businesses committing to build there with the "promise" of a source of natural gas that can't be made.</li> <li>5. Looking down a telescope in reverse keeps us stuck in the 20th century. The state government is supportive of renewable energy sources. We need to put Oneonta on the map as being one of the pt localities that embraces that. THAT is how you will have business evolve. Solar power works. I have panels on my roof Geothermal. Biomass. Even wind.</li> </ol>
42	not dated	Ronald E. Bishop, Ph.D., CHO	<ol style="list-style-type: none"> <li>1. <b>Standing:</b> I am a resident and taxpayer of Otsego County, NY. Considering that some of my state taxes were included in funds granted to the Otsego County Industrial Development Agency, I claim standing to comment on the Draft Generic Environmental Impact Statement for the Oneonta Railyards Redevelopment Plan (dGEIS).</li> <li>2. <b>Expertise:</b> I earned a bachelor's degree in Chemistry from Youngstown State University in 1981 and a Ph.D. in Biochemistry from the West Virginia University School of Medicine in 1990. I was nationally certified as a Chemical Hygiene Officer (CHO: hazardous materials safety specialist) in 2009. Much of my research has been focused on hazardous chemicals for thirty years, and my original peer-reviewed work has been published in, among other journals, <i>Cancer Research</i>, <i>Chemical Research in Toxicology</i>, <i>New Solutions Journal</i>, and <i>Trends in Biochemical Sciences</i>. I am currently an Assistant Professor of Chemistry and Biochemistry at SUNY Oneonta and a member of the Science Advisory Committee for the Southwest Pennsylvania Environmental Health Project.</li> <li>3. <b>Scope:</b> My comments are primarily directed to Sections 3.0 - 3.2 and 6.0 of the dGEIS. They are followed by references to literature cited and a disclosure statement.</li> </ol>

			<p>4. <i>Comments:</i></p> <p><b>3.1.1 Topography, Geology and Soils: Existing Conditions. T</b></p> <p>he extensive presence of Chenango gravely silt loam and smoothed udorthents, especially those overlying coal ash and cinders, is concerning because of the high propensity of these well-drained mineral-rich soils to generate fine dust particles when they are disturbed. Particles smaller than 63 µm in diameter stick avidly to the skin [1], those 10 µm and smaller are easily inhaled into the lungs, and those 2.5 µm and smaller can penetrate the deep lung and bloodstream of exposed individuals [2]. Toxic heavy metals in soil and construction debris have been shown to be selectively concentrated in fine particles [1, 3]. This observation suggests that measurements of these contaminants in bulk materials may be misleadingly low and such test results should not be interpreted to describe the fine particles released from construction and other land disturbances. There is no mention of these complicating factors in this or any section of the dGEIS.</p>
43	not dated	Ronald E. Bishop, Ph.D., CHO	<p><b>3.1.2 Topography, Geology and Soils: Potential Impacts.</b></p> <p>There is no mention of dust propagation in this section, a glaring omission. People - especially children - who live and work downwind would be at risk of ingesting or inhaling fine particulate matter which remains suspended in the air longer and travels farther than ordinary dust grains.</p>
44	not dated	Ronald E. Bishop, Ph.D., CHO	<p><b>3.1.3 Topography, Geology and Soils: Mitigation Measures.</b></p> <p>There is no mention of dust propagation in this section, again a glaring omission. Mitigation measures, if they had been considered, might include water spraying or the use of flocculants to prevent the release of fine particulates.</p>
45	not dated	Ronald E. Bishop, Ph.D., CHO	<p><b>3.2 Soil and Groundwater - Former Site Use Impacts Assessment.</b></p> <p>Three earlier environmental site assessments were mentioned: by H2M Group in 1993, and by Malcom Pirnie, Inc. in 2005 and 2006. These assessments should have been attached as appendices to this dGEIS to provide longitudinal data on the property's industrial history. This is a major omission, and I consider this dGEIS unacceptable until it is corrected.</p>
46	not dated	Ronald E. Bishop, Ph.D., CHO	<p><b>3.2.1 Soil and Groundwater - Former Site Use Impacts Assessment: Existing</b></p> <p><b>Conditions.</b> The dGEIS cited the USEP A Brownfields Assessment Program Phase II Environmental Site Assessment report of 2006 as indicating that groundwater in the study area was contaminated with 1,2,4-trimethylbenzene, isopropyl benzene (a.k.a. cumene), naphthalene and methyl tert-butyl ether (MTBE) at concentrations higher than GA standards set by the New York State Department of Environmental Conservation (NYSDEC) [4]. Discoloring concentrations of iron and manganese in the groundwater were also noted. Soil samples in the study area contained benzo[a]pyrene at more than twice the state commercial soil cleanup objective (SCO) concentration [5], plus SCO-exceeding levels of arsenic, lead and copper. If ingested, inhaled or absorbed through the skin, eyes, or mucous membranes at concentrations greater than GA or SCO standards, these contaminants pose hazards to humans that include harm to skin and multiple organs, and cancer in a variety of tissues [large body of literature]. The Railyards site is well and truly a brownfield, and its redevelopment should be approached with caution.</p>



47	not dated	Ronald E. Bishop, Ph.D., CHO	<p><b>3.2.2 Soil and Groundwater - Former Site Use Impacts Assessment: Potential Impacts.</b></p> <p>The National Academy of Sciences has strenuously argued for decades that mixtures of hazardous materials should be regarded as more potentially harmful than individual components in such mixtures [6], and the Agency for Toxic Substances and Disease Registry (ATSDR) recently published a confirming update [7], but this guidance is absent from the dGEIS discussion of potential impacts in this section. Rather, Delaware Engineering attempts to dismiss the seriousness of the situation by using analytical test results from nearby industrial sites as "typical background" with which to compare the test results for the brownfield study area. This is akin to selecting patients in the psychiatric and cardiology wards of a hospital as "normal, healthy adults", and I believe it is an inexcusable ploy. Considering the real risk of neighbors inhaling microscopic particles containing or coated with the above-cited contaminants, I find the consultants' assertion that "further investigation or remedial activities did not appear to be warranted" to be without scientific merit - or merit of any kind.</p>
48	not dated	Ronald E. Bishop, Ph.D., CHO	<p><b>3.2.3 Soil and Groundwater - Former Site Use Impacts Assessment: Mitigation Measures.</b></p> <p>The dGEIS in this section focuses solely on demolishing abandoned structures and hauling off debris. As mentioned previously, if the generation of dust micro-particles is not prevented or controlled, these activities should be expected to do more harm than good. There was no mention of more promising mitigation measures such as bioremediation for organic compounds such as benzo[a]pyrene [8] and metals such as arsenic [9]. Among other points to consider, longitudinal testing of the Oneonta Rail yard soils could have provided some insight as to whether microbes capable of degrading or sequestering the known contaminants may already be established - a missed opportunity. In my opinion, this dGEIS is not complete and not ready for endorsement by a Common Council practicing due diligence or by an educated public.</p>
49	not dated	Ronald E. Bishop, Ph.D., CHO	<p><b>6.0 Unavoidable Adverse Impacts.</b> I disagree with the consultants' assertion that "the most substantive impacts identified at any scale of development are those to the on-site wetlands". Although these may be substantial, I submit that the most significant impacts would be those to downwind neighbors if this current iteration of the dGEIS is the primary safeguard for redevelopment. This document as a whole, in my opinion, is designed more to promote industrial laissez-faire than to protect public health, and I call on our elected officials to demand better work from their consultants.</p> <p><b>References:</b></p> <ol style="list-style-type: none"> <li>1. Beamer, P.I., Elish, C.A, Roe, D.J., Loh, M. and Layton, D.W. Differences in Metal Concentration by Particle Size in Bouse Dust and Soil. <i>Journal of Environmental Monitoring</i> <b>14(3)</b>: 839 - 844 (2012) doi:10.1039/c2em10740f</li> <li>2. Particulate Matter (PM) Pollution. <i>United States Environmental Protection Agency Environmental Topics</i>. <a href="http://www.epa.gov/pm-pollution/particulate-matter-pm-basics">http://www.epa.gov/pm-pollution/particulate-matter-pm-basics</a> accessed 3/1/2019</li> <li>3. Townsend, T., Tolaymat, T., Leo, K. and Jambeck, J. Heavy Metals in Recovered Fines from Construction and Demolition Debris Recycling Facilities in Florida. <i>Science of the Total Environment</i> <b>332</b>: 1 - 11 (2004) doi:10.1016/j.scitotenv.2004.03.011</li> <li>4. Zambrano, J. and Stoner, S. Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitation s. <i>NYSDEC Division of Water Technical and Operational Guidance Series 1.1.1 (JOGS 1.1.1)</i> 6 NYCRR Parts 700-706, Water Quality Regulation, June 1998.</li> </ol>

			<p>5. 6 NYCRR Part 375 Environmental Remediation Programs, Subparts 375-1 -4 &amp; 375-6.(20.06). <i>NYSDEC Division of Environmental Remediation</i> 6. Science and Judgment in Risk Assessment. (1994) <i>Committee on Risk Assessment of Hazardous Air Pollutants, National Research Council</i>. ISBN: 0-309-55622-8</p> <p>7. Pohl, II., Mumtaz, M., McClure, P., Colman, J., Zaccaria, K., Melia, J. and Ingerman, L. (2018) Framework for Assessing Health Impacts of NMultiple Chemicals and Other Stressors (Update) <i>U.S. Department of Health and Human Services, Public Health Service, Agency for Toxic Substances and Disease Registry, Division of Toxicology</i></p> <p>8. Loss, E.M.O and Yu, J.H. Bioremediation and Microbial Metabolism of Benzo(a)pyrene. <i>Molecular Microbiology</i> <b>109(4)</b>: 433-444 (2018) doi:10.1111/mmi.14062</p> <p>9. Sultana, M., Sanyal, S.K., Hossain, M.A. <b>Chapter 5. Arsenic Pollution in the Environment: Role of Microbes in its Bioremediation.</b> In: <i>Singh Sand Srivastava K, Editors. Handbook of Research on Uncovering New Methods for Ecosystem Management Through Bioremediation.</i> ISBN 978-1-4666-8683-0 (e-book)</p> <p><b>Disclosure:</b> The opinions expressed in this commentary are mine alone, submitted as a private citizen. They do not represent the views of the State University of New York at Oneonta, the Southwest Pennsylvania Environmental Health Project, or any other public or private entity.</p>
50	3/18/2019	Colleen Blacklock	<p>I live in the 5th ward. I have lived here for 21 years and have raised my children here. I am a single mother, and I currently cannot afford to get another car and so I am borrowing one. I am fortunate to live here in a house co-owned by a relative. I pay my taxes on time even though I currently have a limited income. I am also the sole proprietor of a small business and very aware of the ups and downs of owning a business in this small town. I am also grateful to live in this beautiful place with so much to offer.</p> <p>My neighborhood has always been important to me. When Greater Plains Elementary School began asbestos remediation while school was in session, I raised concerns with the school board. When 5 guys from Texas wanted to build a wood and garbage burning power plant in the railyards, I worked tirelessly with my neighbors to scrutinize and challenge this project. Many neighbors of all political and socio-economic backgrounds came together to fight the biomass plant because it was not carefully thought out and we didn't want to live with it in our backyards. I worked with the PTO at Greater Plains school to put in a garden for the students to plant and learn from. We also had a local food festival celebrating the garden.</p> <p>In 2007, I, along with others, held a wonderful climate change awareness event on Main Street with a bicycle parade, rally, fair, panel discussion, and movie. The superintendent at the time blocked us from sending flyers home with the kids because he didn't believe in climate change, but the school board backed us. At that event, Mayor Nader declared April 14th "Step It Up Oneonta Day" in recognition of fighting climate change. That was 12 years ago. Since then, I joined thousands of others in the area and the state to ban the fracking of natural gas in our state and to oppose gas infrastructure that would encourage more tracking in Pennsylvania.</p> <p>I have also served on the Human Rights Commission of Oneonta and mentored with the O.H.S robotics team along with all of the other usual parental participation in sports, girl scouts, etc.) So, when I see the media characterize those who are opposed to a gas infrastructure build-out as rich outsiders, I am offended and I think that is an absolutely wrong and misleading characterization.</p> <p>Also problematic is the mandate of the IDA, the applicant for the railyards project, that they must seek to encourage manufacturing and/or distribution types of businesses. This leaves out a lot of other businesses that may be more compatible with our neighborhoods. A net-zero carbon</p>

emissions eco-park, based on renewable energy and aimed at encouraging intellectual businesses, would be much more beneficial to our neighborhoods and would encourage young college students to stay in Oneonta and OHS students to return to Oneonta after college as well as providing other kinds of jobs for local youth who do not go on to college.

Now we have this railyard project in our backyard and we need to get this right for the neighborhood and the environment.

#### **Issues that may impact local residents in the 5th and 6th wards**

#### **Energy needs of the Railyards, Zoning Laws and Segmentation of the GEIS**

The possible energy needs of the largest build-out in the railyards are stated in the GEIS as 40,000MBTUs and 7MW. This amount of energy in the form of heat and electricity is not available in our immediate area and would necessitate more energy being brought in. The decompressor project named by the IDA in a recent CFA grant application was linked to the railyard project in that same grant application. So, for the complete buildout of the preferred option; the building of a decompressor station in the town needed to be considered as part of the GEIS. That should have included all of the cumulative impacts of such a station, the toxic fumes from VOCs that stay near ground level, the lights, noise and truck traffic of a CNG decompressor station, the dangers of CNG trucks to local traffic, and the long-term health impacts of living near a decompressor station. If the DeRuyter pipeline gets expanded, the decompressor station could become a compressor station and that would also have local health impacts with noxious VOCs even worse than the decompressor.

The possibility of a microgrid gas-fired power plant to supply the extra needed electricity for the railyards should also have been considered as it has been talked about by the IDA, the applicant for the railyards project. The problem with all of this is that the whole project is being done piecemeal and could have used more study up front about what we really want instead of it coming in bits and pieces. The build-out of natural gas infrastructure is something only implied but it would be necessary if an alternative energy source or extreme conservation measures were not undertaken.

At another time in our history, this aspect of development may have gone unnoticed but today with climate change threatening us in the near future, it is imperative to look closely at the energy aspects of this railyard proposal. Also, as we learn more about living near gas infrastructure like compressors and power plants, we learn that people are having very real health impacts that need to be considered in the placement of such a facility. While this type of structure might not be placed in the railyards because of the limitations of zoning, it might be placed in the town or nearby, still close enough to affect residents and certainly our neighbors. Not to mention it would encourage more use of fracked gas from our neighbors in Pennsylvania who bear the burden of toxic tracking. Here is a health study of impacts of compressor stations on communities in NY which they are placed. [https://www.albany.edu/about/assets/eomplete\\_report.pdf](https://www.albany.edu/about/assets/eomplete_report.pdf)

The newly formed task force will look at energy needs of our county, but will they look at the impacts of possible gas infrastructure build-out on neighborhoods? The Railyard GEIS and related projects is the place to do this.

#### **Brownfields**

In the Malcolm Pirnie report on p. 8 it states: "This Report may not address all the requirements in the City's due diligence assessment of risks associated with this property.

51	3/18/2019	Colleen Blacklock	Brownfields: What types of due diligence has the City, the IDA and Delaware Engineering done? Which aspects were not addressed in this report?
52	3/18/2019	Colleen Blacklock	Brownfields: Was the public notified and was there public input about the brownfield situation?
53	3/18/2019	Colleen Blacklock	Brownfields: whether you have considered the fine dust problem?
54	3/18/2019	Colleen Blacklock	Brownfields: And what steps will you take to make sure that it is safe to dig up the soil and to drag debris across the surface and disturb the soil?
55	3/18/2019	Colleen Blacklock	Brownfields: Mr. Zakrevsky, in his recent town hall meeting, stated that the IDA is looking to hire someone to remove debris from the site, such as large chunks of concrete. Will this disturb soil to the point that it will kick up dust?
56	3/18/2019	Colleen Blacklock	Brownfields: If there are dangerous chemicals adhering to microparticles, how do you intend to mitigate the dust and microparticle issue?
57	3/18/2019	Colleen Blacklock	Brownfields: Why was the Phase 2 of the Malcolm Pirnie report not available when it was FOILed from the city and yet it was referenced by Delaware Engineering and Mr. Zakrevsky said he had it in his possession and that he emailed it to the DEC. Why was it also not available from the DEC when FOILed and yet Mr. Zakrevsky stated that the DEC signed off on it 2 times, once recently. All reports mentioned in the GEIS should have been appended to the GEIS for review by the public. Since they were not, the public was not able to make complete comments and perhaps was kept from asking some relevant questions. I ask that any issues or comments that come out of reviewing the FOILed documents once they have been obtained, be accepted after the due date of March 18th, and added to the list of comments to be addressed.

58	3/18/2019	Colleen Blacklock	<p>Traffic: Chestnut street is already a highly congested and problematic street. It is the only way to and from downtown Oneonta unless you go all the way around. Many parents and workers, myself included, use this road several times a day and encounter all kinds of problems with traffic flow. The street is very narrow and often people are parked in such a way that it is difficult to get around them without going into the other lane. Bicycles cannot ride down this road without forcing traffic into the other lane. Cars also have difficulty backing out onto Chestnut from their driveways and once a car backed out into and crushed the side of my car as I was driving past. Many times our failing phone and electric lines need to be worked on and there are repair trucks blocking traffic. In the winter, Chestnut street takes a beating - with the current traffic and the elements it is full of potholes and one of my car tires popped while driving over a large pothole a couple of years ago. I was not compensated because the city said it was the first time they heard of that pothole. There are sidewalks but not on both sides of the street so it is not a great street for pedestrians. The recent addition of pedestrian crossings is helpful. But the blind corner near Nick's Diner and Fonda Ave is an accident waiting to happen with people crossing the street there.</p> <p>Every school day, school buses stop all along the corridor, stopping traffic and waiting for tiny children to get on and off the bus and cross the street. These same children that live on Chestnut can be seen playing in their front yards along Chestnut in warmer months. To sum it up, this street is very busy and barely able to handle all of the car, bike, pedestrian, bus, and repair truck traffic not to mention emergency vehicles. Any addition of large trucks to Chestnut Street would have a negative impact on a bustling, already congested and overburdened road. It is bad enough as it is. Adding more large trucks to this situation would be a big mistake.</p> <p>Yet, there is nothing in the GEIS addressing the possibility of more trucks coming into Fonda Avenue other than making Fonda a little wider. There is also no way for Oneonta to prevent trucks under a certain size and weight from driving on Route 7 and 23 (Chestnut) if they are making local deliveries. So, the number of trucks that could be added to the situation could, in the worst case scenario, be a lot more. While this is not likely, even 10 large trucks a day more could pose lots of problems for local residents, the children, pedestrians, bikes, emergency vehicles, and car traffic. The traffic study for the GEIS is incomplete and needs to adequately address these specifics. I recommend someone from Delaware Engineering try riding their bike up and down Chestnut and you will quickly get the idea as you avoid potholes, force traffic into the other lane and generally feel unsafe.</p>
59	3/18/2019	Colleen Blacklock	<p>Air quality: The railyard sits in a valley. In years past, the residents of Oneonta and particularly the 5th and 5th wards fought having a wood/garbage burning energy power plant in the railyards because we were concerned that our air quality would be compromised with dust and particulates from truck traffic and particulate pollution from smoke stacks. We did not at that time want a buildout of dirty industrial applications right there in our backyard. As you may remember, citizens, both Democrat and Republican, of all socio-economic backgrounds rallied together to reject this proposal. Again, in a worst-case scenario that the GEIS entertains, we face the possibility of having some kind of industrial application that would compromise local residents' air quality. While the railyards are not expected to have this type of development, under the GEIS as written, it would allow industrial applications which could involve more emissions. The other source of emissions that could be linked to the railyards are those from gas infrastructure needed to supply the railyards. Gas infrastructure such as a decompressor, compressor, or micro-grid power plant could potentially be built nearby to feed the railyards the estimated 40,000 MBTUs and 7 MW. The potential cumulative impacts on the health of local residents of air pollution from industry and/or gas infra-structure build-out was nowhere addressed in the GEIS. This is already an economically struggling area and adding more potential health impacts needs to be addressed.</p>

60	3/18/2019	Colleen Blacklock	Pedestrians across the Railyards: One of the aims of developing the railyards is job creation for people in the area. Many people in poverty in our area are already working at low paying jobs. They may not have cars. There are some people who live in the 5th ward and walk to the 5th ward to work. They count on crossing over at the railyards. To get back and forth to work, going around either by bus or walking would be an incredible hardship of time, effort and money for people already struggling. The movement of pedestrians between the 5th and 5th wards needs to be considered. My son also used this path on his bicycle to get to his father's house because it avoided a lot of awful traffic on Chestnut and was much quicker. The GEIS needs to consider and accommodate local residents and neighborhoods.
61	3/18/2019	Colleen Blacklock	Flooding and Wetlands: As flooding events like 100 year and 500 year floods are occurring more and more frequently, and as there is contamination of soil in the railyards and surrounding areas, flooding could become a nasty and toxic problem for nearby neighbors. The impacts of such disasters and prevention of such disasters was not properly considered by the GEIS. We have already experienced some serious flooding in the west end in recent years, primarily due to poor planning when the Hartwick hill was logged by Hartwick College and when Winney Hill Commons was built. People who never had problems before had flooding in their basements. As neighbors in this City of the Hills, we have to very carefully consider what we do uphill from someone because it could have dire consequences below us. The railyard holds a wetland which serves as a kind of giant sponge to soak up huge amounts of extra water in times of excess rainfall. As Donna Vogler pointed out in her comments, the Carlisle Muck of the wetlands being considered, serves a very important function of flood mitigation. She also says there is very little of this kind of soil and wetland area in the city serving such a function and to remove some of it would be a mistake. This wetland in question is also below the Hartwick hill and catches a lot of runoff water from the hill. If this wetland were to be filled in and parts of it removed, it could have a very negative impact on nearby neighbors at the same or lower altitudes. As flooding events like 100 year and 500 year floods are occurring more and more frequently, and as there is contamination of soil in the railyards and surrounding areas, flooding could become a nasty and toxic problem for nearby neighbors. The impacts of such disasters and prevention of such disasters was not properly considered by the GEIS. Again, one might have to live below this hill to see the kind of water runoff and flooding we experience and how seemingly minor changes uphill cause big problems downhill.
62	3/5/2019	Steve Londner	A GEIS looks at intensive land-use and focuses on the potential impacts of the worst-case scenario. As such, this current draft of the GEIS report offers a stark vision for the railyards development, one totally at odds with our community's commitments to environmental and social responsibility. We know we can do much better.
63	3/5/2019	Steve Londner	A well-planned, sustainable, Eco-Commercial Park would offer employment opportunities and new city revenues, along with a mix of attractive public and natural spaces.
64	3/5/2019	Steve Londner	And - importantly - it would attract socially and environmentally conscious businesses to our area as community members and neighbors, and expand local economic opportunities for our children.

65	3/5/2019	Steve Londner	<p>But sustainability means different things to different people. As we start down an alternative development path we need to do the hard work of building a guiding community consensus on what sustainability should mean for the railyards. Of course, energy issues are key.</p> <p>But I think the issue of maximizing the use of renewable energy may in fact prove one of the easiest to resolve - determined by science and technology, and by the relevant economic and political realities. More challenging, may be defining sustainability for our neighborhoods - how can a re-imagined railyards project best enhance life in our fifth and sixth wards? How can it best be linked to our downtown, and to our parks?</p> <p>And, critically, our definition of sustainability must guide a design that attracts investors.</p> <p>The "greening" of commerce in response to changing consumer demands continues to gather momentum. A sustainable railyards Eco-Commercial Park could be the first project in New York to offer uniquely "green" business locations and value propositions for investors.</p> <p>But, the way forward can't be a business-as-usual, "build it and they will come" It needs to be, "Let's work together to design and build it." Potential investors must be part of the design effort.</p> <p>So how do we start? We already have. This hearing advances the conversation. Now it's time to expand it. Local leaders, of all stripes, need to come together and guide the community to a basic design consensus for a sustainable Eco-Commercial Park in the railyards.</p> <p>Mario Cuomo said: "There are only two rules for being successful. One, figure out exactly what you want to do, and two, do it." If we can come together and act decisively and soon, Oneonta could capture diverse first-mover advantages -- we could spark the imagination of key state agencies and area universities, and attract the additional resources needed for us, as a community, to develop this exciting alternative option.</p>
66	not dated	Drnek, Mark	<p>Having only recently become acquainted with the content of the GEIS. I have questions for which I'd appreciate further information. Your response will help me gain a more informed opinion on this complicated proposal, and I look forward it.</p> <p><b>Process?</b></p> <p>As I have come to understand the GEIS. it is a preliminary document; which sets the basic parameters of an invitation to development. In other words, it is a sales tool, to be referenced by the soliciting agency and the prospective, interested party.</p> <p>As such, it offers a broad brush depiction of what might be a .. golden opportunity" for the location of industry, including access to transportation infrastructure, shovel ready land on which to place its own unique structural footprint, equidistant location to major markets, and other incentives. The most problematic of the offerings, I suspect, is energy access and availabilities.</p> <p>It's safe to say, that the strategies regarding this present the community's greatest concern and the agency's biggest hurdle.</p> <p>My question though, is this:</p> <p>As the rail yards project moves forward, presentations are made, and the agency secures a level of interest from a potential tenant, what is the process? There are many concerns that will need to be addressed:</p> <ul style="list-style-type: none"> <li>• Toxins mitigation (soil)</li> <li>• Wetland/environmental impact</li> <li>• Transportation infrastructure and impact upon- traffic and neighborhoods</li> <li>• Fuel delivery and (in the case of natural gas) decompression</li> </ul>

67	not dated	Drnek, Mark	Will there be studies? If so, who will be contracted, who will supervise, what are the timelines, and what is the process for public reporting/ accountability?
68	not dated	Drnek, Mark	<p>Having only recently become acquainted with the content of the GEIS, I have questions for which I'd appreciate further information. Your response will help me gain a more informed opinion on this complicated proposal, and I look forward it.</p> <p><b>Generic?</b></p> <p>The GEIS is, I believe by definition, generic. And yet there are specifics detailed throughout, from fuel sources to building sizes and locations, and more. I am confused by the mixed responses I have gotten when I've asked about this.</p> <p>Can you tell me what, specifically, is being proposed in the GEIS in the following instances, and what has been described and detailed but in fact is NITT meant to be taken as a literal expectation of the final rail yard development?</p> <ul style="list-style-type: none"> <li>• Buildings (size, location)</li> <li>• Primary fuel source and delivery</li> </ul>
69	not dated	Drnek, Mark	<p>While I await your clarifications with an open mind, I want to take this opportunity to express and register my concern with any site plan that would impact the adjacent wetland area or compromise its filtration of rain and runoff as it empties into the Susquehanna River.</p> <p>I should also be counted as another of the concerned local citizenry regarding any increase in natural gas reliance and the attendant infrastructure required for its transportation and decompression.</p>
70	3/18/2019	Kelley M. Eckmair, Esq.	<p>As a property owner in the City of Oneonta, I am writing to express my concerns about the GEIS that was prepared for the City by Delaware Engineering.</p> <p>I moved back to the area after graduating from law school in 1990 and have practiced law here since then, maintaining an office in the City at my current address since about 2002. I reviewed the Otsego 2000 comments, including those of Dr. Donna W. Vogler and Dr. Ronald Bishop, and agree with the conclusion that there are serious deficiencies with the DGEIS. I urge the counsel to send it back to Delaware Engineering for a quality product the tax payers bargained and paid for once the Comprehensive Plan and the Energy Task force report are complete. Until then the matter should be tabled and further options explored, including the clean-up of the brown field situation and possible green alternatives such as an Eco Park.</p>
71	3/18/2019	Kelley M. Eckmair, Esq.	Otsego 2000 provided an eloquent analysis of the myriad concerns many of which have been identified as flaws with the DGEIS and it is critically important that you address the concerns and ensure that the process and law are properly followed and the people are heard.
72	3/18/2019	Kelley M. Eckmair, Esq.	We have a once in a lifetime opportunity to put Oneonta in the limelight for being forward thinking and green. There are many healthy, sustainable things that could be done with the railyard and it behooves the City Council to consider options that do not include the necessity of importing more gas or contribute to any more global warming or have other negative environmental impacts. Let's put Oneonta on the map for being a part of the solution - looking forward to a better future for everyone!



73	3/13/2019	Karen Foster	<p>I have heard many concerns about possible soil contaminants in that area. Any development before abatement is very concerning. If all contamination is not dealt with, possible fire or explosions from gas compressors would be a serious concern.</p> <p>New York State is very focused on creating Green jobs. There have been commitments from both the City and the County to be Green communities. This project negates all of those promises. I am employed at a trucking company in this area. I can tell you it is very hard on that residential neighborhood to deal with the long hours of bug truck traffic. Our community has been very clear on our feelings about inviting a project like this in Oneonta. Please consider something that would provide more job[s] and a safer environment for our residents. Please consider every possibility for an eco-friendly park. Many companies have considered this stretch of I-88 to start eco-conscious business. There have been tire recyclers, and similar business looking for similar business looking for locations. Please look into the business considered for the Old Walmart Distribution Center as examples of the types of companies that would desire that location. Thank you for taking the time to review my concerns.</p>
74	3/15/2019	Vera E. Genua	<p>I am writing to you with regard to: <b>dGEIS for the Oneonta Rail Yard Development</b></p> <p>My name is Vera Genua. I am 91 years old and a life-long resident of New York State. I am the matriarch of a large family. I have been a mother, aunt and caretaker to more than 25 children. I have worked as a farmer, seamstress, an artist and a craftswoman. I understand well the values and culture of central New York and I write to offer my thoughts on the problems with the dGEIS for the development of the Oneonta Rail Yard.</p> <p>My primary concerns regarding the DGEIS center on two issues: traffic and wetlands disruption.</p> <p>This understanding leads me to express the following objections to the DGEIS for Rail Yard development in Oneonta:</p> <ol style="list-style-type: none"> <li>1. The DGEIS identifies natural gas as the type energy required for the Rail Yard development but it does not assess its impacts as an energy source. Will the gas be delivered by hundreds of trucks? I have lived along the "virtual pipeline" from Pennsylvania's tracked gas on Rt. 205 - and the danger of explosive truck traffic is quite evident to me. This very month a gas truck rolled over near Cobleskill and led to evacuations. At my age I don't need that.</li> </ol>
75	3/15/2019	Vera E. Genua	<ol style="list-style-type: none"> <li>2. The infrastructure required to provide an adequate gas supply for Rail Yard development (e.g. a decompressor station and a CNG trucking plan or an expansion of the DeRuyter pipeline) is neither mentioned nor assessed for impact at local or regional levels in the DGEIS. This is an instance of illegal segmentation. Why has this aspect of development not been taken into account? It raises the same question as above - more traffic, accidents and explosions.</li> </ol>
76	3/15/2019	Vera E. Genua	<ol style="list-style-type: none"> <li>3. The current plan and technical drawing in the DGEIS includes buildings impinging on wetlands. But there are chemicals in the ground at the Rail Yards that are withheld from circulation by the plants of the wetlands. They minimize the circulation of these old chemicals into the rest of our aquifer and they help control flooding. What will they do to prevent problems from toxins already in this area?</li> </ol>
77	3/15/2019	Vera E. Genua	<ol style="list-style-type: none"> <li>4. The DGEIS did not address truck traffic, lights, noise, odor, and pollution that inevitably accompany industrial development. I go by this area all the time and I am old - what will its impact be on my health? And what about young children or people who are ill? If you are going to do development and you claim it is for the benefit of the community then you can't do it without taking environmental health concerns seriously. IDA does not seem to have done this plan with any concern for the locals - only for the businessmen who plan to make a profit.</li> </ol>

78	3/15/2019	Vera E. Genua	5. Tractor trailers and other traffic will of necessity pass through the Town of Oneonta in order to access this development from the interstate. What is the rationale for not including the Town of Oneonta's risks as part of the geis. The project claims its goal it to help both the economy and the infrastructure of the entire region, no? So why should the safety of the entire area not be accounted for?
79	3/15/2019	Vera E. Genua	It would be a lot better if we started out with high priorities for health friendly and environmentally friendly industries - that way we can be sure that everyone benefits from development and not just those with the most economic influence.
80	2/5/2019	Dennis Higgins	<p>Page references are to PDF on my computer, two pages ahead of Delaware Engineering pagination Overview</p> <p>The SEORA requires that an analysis of the worst case scenario for all potential impacts appear in the GEIS. But until specific future development plans are identified this is not possible. Will this complex include a power plant, or the decompressor originally proposed for Pony Farm Industrial Park? The City cannot proceed through a generic process because the future scale, intensity, and impact of the project are not identified and consequently have not been analyzed. In particular, analyses presented in this GEIS are inadequate as to electricity and gas requirements, traffic volume and flow, wetlands, toxic contamination, pollution and other impacts of heavy industry. Many of these considerations require participation by the Town, regional stakeholders, and outside agencies.</p>
81	2/5/2019	Dennis Higgins	As noted pg 7, this "Generic Environmental Impact Statement (will) outline the proposed redevelopment at full build out, the existing environmental conditions, the potential environmental impacts and the likely mitigation measures that could reduce or eliminate the environmental impacts"
82	2/5/2019	Dennis Higgins	According to zoning (pg. 69) this area can accommodate "large and small scale commercial development as well as light and heavy industrial uses, and moderate-sized residential developments. Commercial and industrial operations must respect the character of surrounding residential uses by mitigating noise, pollution, and other environmental impacts." We must guess what heavy industry will go in the railyards and determine if appropriate mitigation for the odor, noise, lights, traffic, and pollution attending it are detailed here. Will residents welcome the 24-hour truck traffic, odor, lights, and pollution of a power plant or decompressor station or other heavy-industrial processes? Pollution - like power-plant carcinogenic volatile organic compounds, smog-forming nitrogen oxide, and 2.5 particulates - will drift into Oneonta and be exacerbated by any temperature inversions. As noted on pg 69, generation of electricity is specifically articulated as an allowable use. Outdoor storage of materials may be addressed in City codes, but I doubt those codes provide guidance for storage of the thousands of cubic feet of gas in CNG trailers Which might be burned for electric generation or "decompressed" and injected into local pipelines. It provides no guidance at all for heavy industry applications in the city. I don't think fences and trellises will provide sufficient buffer for vented gas and voes. Because the Council does not constrain the usage of the rail yards, we must conclude this document provides inadequate mitigation.

83	2/5/2019	Dennis Higgins	<p>Although the GEIS claims "environmental review has been conducted in conformance with the New York State Environmental Quality Review Act (SEQR)" this is debatable. In its SEQR handbook, the DEC says that if the answer to one or more of the following questions is "yes," the reviewing agency should be concerned that improper segmentation is taking place:</p> <ul style="list-style-type: none"> <li>• Is there a common purpose or goal for the segments?</li> <li>• Are the different segments under the same ownership or control?</li> <li>• Is a given segment a component of an identifiable overall plan?</li> <li>• Can any of the interrelated phases of various projects be considered functionally dependent on each other?</li> </ul>
84	2/5/2019	Dennis Higgins	<p>According to COIDA (IDA), railyard development in the city, the proposed decompressor plant in the town, and any future expansion of the NYSEG Deruyter pipeline serving Oneonta are all related parts of the same development scheme. The Oneonta Town Board should be concerned that it has been excluded from the review of a project that would have a significant impact on the region's energy resources.</p>
85	2/5/2019	Dennis Higgins	<p>I could not find in the traffic study consideration of CNG tractor-trailers at the Rte 205 intersection or at the rail yards. GEIS provides estimates for traffic volume and delay patterns, however realistic increases in tractor-trailer traffic consistent with production and shipping are lacking. These could adversely impact area road surfaces, traffic, and accident incidence. The f-88/Rte205 intersection - deemed dangerous in the Town CP - was omitted from the traffic study although this is the Ukely route by which materials would arrive or be shipped. This is also the route CNG truck traffic would follow. The Oneida Street/Rte 205 intersection is in the Town which was not included in the GEIS process. Additional traffic and congestion on local roads increase exhaust fumes in residential areas.</p>
86	2/5/2019	Dennis Higgins	<p>The baseload gas (40,000 MBTUs), plus any gas needed for industrial processes is not available for railyard development, as the GEIS acknowledges (pg. 75 and elsewhere). The 7.7MW electric power needed is not currently available. Any increased demand for energy should require participation by area stakeholders, including the Town.</p>
87	2/5/2019	Dennis Higgins	<p>Piping and electric transmission are discussed but PSC Article 7 seems to have been overlooked. "Article VII establishes the forum in which community residents can participate with members of state and local agencies in the review process. Throughout the Article VII review process, applicants are strongly encouraged to follow a public information process designed to involve the public in a project's review. • This Includes "125 kV and over, extending a distance of one mile" and "natural ps pipelines extending a distance of at least 1,000 feet and operated at pressures of 125 PStG-. The law requires an applicant to apply for a Certificate of Environmental Compatibility and Public Need (Certificate) and meet the Article VII requirements before construction, any such facility. It is doubtful that Article 7 public involvement requirements in the review process have been met.</p> <p>(<a href="http://www3.dps.ny.gov/VWPSCWeb.nsf/96fOfecOb45a3c6485257688006a701a/a021e67e05b99ead85257687006f393b/\$FILE/19336071.pdf/Article%20VII%20Guide%20Web%2011-17%20Finatpdf">http://www3.dps.ny.gov/VWPSCWeb.nsf/96fOfecOb45a3c6485257688006a701a/a021e67e05b99ead85257687006f393b/\$FILE/19336071.pdf/Article%20VII%20Guide%20Web%2011-17%20Finatpdf</a>)</p>
88	2/5/2019	Dennis Higgins	<p>The City Council has an opportunity to develop site plans which conform to the Public Service Commission's current energy policies. You have an opportunity to consider development consistent with the Governor's plans to reduce greenhouse gas emissions - to net zero carbon in 20 years- and to dramatically increase deployment of renewables. This is the path which our region, the state as a whole, and the planet require you take.</p>

89	2/5/2019	Dennis Higgins	The GEIS must provide broad scoping for "worst-case scenarios, yet none are considered here. Instead, once the GEIS is approved, projects advance but require further review: "At the time a site-specific project is determined, in some cases, additional environmental review under SEQR may be necessary; in addition, applicable permits and local approvals will need to be obtained." (pg 6)
90	2/5/2019	Dennis Higgins	NY Codes Rules and Regulations 617. 10 (part C) states "Generic EISs and their findings should set forth specific conditions or criteria under which future actions will be undertaken or approved, including requirements for any subsequent SEQR compliance. This may include thresholds and criteria for supplemental EISs to reflect specific significant impacts, such as site-specific impacts, that were not adequately addressed or analyzed in the generic EIS." Particularly as necessary mitigation for foreseeable impacts has been ignored, it is troubling that criteria for supplemental EIS are not delineated in this document. The development timeframe stretches out beyond tenure for current council members but the GEIS provides inadequate planning detail for others who must provide guidance and oversight in the future.
91	2/5/2019	Dennis Higgins	We must examine the OGEIS to determine if full buildout for any occupant and any conceivable environmental impacts have been considered. Yet the GEIS goes on to say this process will provide accelerated project review: "reducing the risk associated with time and opening of the environmental review process and provides certainty as to redevelopment opportunities.
92	2/5/2019	Dennis Higgins	The GEIS acknowledges its own shortcomings, possibly involving segmentation, with respect to traffic and energy transmission in the Town, and other jurisdictions: Project "will involve the construction of structures, parking, and access to the site as well as the extension of utility infrastructure and site roadways, for a total potential project area consisting of approximately 50 acres with access to public water and sewer systems as well as electricity and natural gas."
93	2/5/2019	Dennis Higgins	Import/export, brewing, and food prep are benign applications. But heavy industrial applications exclude nothing: a power plant might be sited here as well. As noted later, "heavy industrial use is planned for which no gas supply is available. (pg 24)
94	2/5/2019	Dennis Higgins	It seems planning for mitigation or restoration is pushed off to some indefinite date despite the earlier claim that full build-out would here be examined: "The protection, restoration and enhancement of wetlands and habitat at a ratio of at least one to one for every acre impacted should be planned." (GEIS, p.8) Wetlands management requires a "master plan" which is missing here.
95	2/5/2019	Dennis Higgins	Approval of the GEIS opens the door to virtually any development at the railyards, but the GEIS postpones the review required for those uses indicating instead that (pg 9) "Project specific review and permits will be obtained from appropriate local, state and national agencies as necessary at the time a final redevelopment proposal is defined."
96	2/5/2019	Dennis Higgins	DGEIS pg 13 "Its proximity and access to highway ... makes this location ideal for the expansion of industrial development within Otsego County and the City of Oneonta." Proximity to highways is touted as an advantage for development, but as I have noted, no consideration has been given to dramatically increased truck traffic, possibly including CNG tractor trailers. accessing this site via residential roads and dangerous interactions.
97	2/5/2019	Dennis Higgins	As noted, pg 15, necessary infrastructure Which would involve Town participation and review, is lacking: "New infrastructure to support the Master Plan includes site roads and parking, water distribution, wastewater conveyance infrastructure, telecommunications, and extension of power and natural gas."

98	2/5/2019	Dennis Higgins	As already noted, consideration of risks associated with the 1-88/Rte205 intersection in Town seems to have been omitted from the traffic study though it is referenced here, pg 17: "Traffic from Interstate 88, at Exit 13, utilizes NYS Routes 7 and 205 to access Lower River Street and Roundhouse Road to access the Study Area.11 Heavy truck traffic will access the area via lower River Street (pg 17), although no rationale for increased truck volume is presented and the hazards associated with increased tractor-trailer volume on residential roads, some with schools, is minimized or ignored.
99	2/5/2019	Dennis Higgins	Noted on page 19, natural gas transmission via pipeline or truck would seem to involve the Town which has been excluded from this review. "Natural gas usage is estimated at approximately 40,000 MMBtu per year for commercial/industrial spaces of the sizes projected in the Preferred Option at minimum build out, as shown in Table Z.3..Sb. Modern energy efficient construction of buildings will reduce heating and cooling demands in conformance with building codes. Currently capacity in the natural gas local distribution may not be available. As specific development plans are prepared NYSEG will be consulted.11 Further, because prospective occupants for this study have not been identified. the potentially significant fuel requirements for industrial processes or electric generating turbines have been ignored. The 40,000 MBTU figure provided here for heating or domestic use is therefore suspect. A 25MW power plant would require a dozen CNG trucks daily. A decompressor facility boosting area gas by 25% would require two dozen or more trucks daily.
100	2/5/2019	Dennis Higgins	Pg. 22 plans suggest sustainable options exist, but none are required, thus allowing for unconstrained additional loads to regional electricity and gas supplies. "Alternative heating and cooling options such as geothermal heat pumps and solar electricity and/or solar hot water could be incorporated to reduce annual energy usage and reduce operation costs."
101	2/5/2019	Dennis Higgins	Any storm-water considerations seem to have been postponed to some later date. (pg 22) We are promised 'practicable' mitigation - whatever that means - but it is utterly unclear how oversight for these processes will be provided. Stormwater mitigation requires a master plan which is missing. "Stormwater management practices that will be implemented include minimizing the .area of disturbance to the extent practicable, construction sequencing7 and a combination of structural (temporary and permanent) and vegetative measures to minimize erosion and sediment loading to the drainage features and wetlands located in the Study Area."
102	2/5/2019	Dennis Higgins	Apparently no state or federal agency has yet been involved in wetland confirmation. (pg 23) Will the City pursue GEIS approval without wetland determination by appropriate oversight agencies? As noted here, wetland perimeters wm determine building and roadway boundaries. It is unclear consequently how these could be determined in the GEIS before clear boundaries for wetlands have been established.
103	2/5/2019	Dennis Higgins	"Performance standards prohibit nuisance activities which could unnecessarily disturb others." The noise, traffic, lights, and smell of constant tractor-trailer traffic, specifically CNG tractor-trailers which might supply gas to the rail yards, have not been considered here. Such traffic would require Town participation in the SEQR and GEIS process.
104	2/5/2019	Dennis Higgins	Because the County might be responsible for road maintenance and stormwater structures once constructed, County participation in this SEQR and GEIS process should have been solicited. Pg 26. "Roadways installed in the re-developed area will be constructed to applicable standards and dedicated to either the City of Oneonta or Otsego County at the conclusion of construction. The City or the County would provide road maintenance." And "Management of stormwater structures may be the responsibility of the City or County along with the roads"
105	2/5/2019	Dennis Higgins	(pg 31) This area was once part of the Susquehanna flood plain. As we enter a period where we can expect a 100-year flood every decade, was consideration given to how far underwater this region was during recent floods?

106	2/5/2019	Dennis Higgins	Groundwater, sediment, and soil toxins identified (pg 35 and pg 36) would seem to preclude residence construction and other uses of the site. Contaminant seepage into groundwater, stream, or wetlands would need mitigation and oversight during any construction
107	2/5/2019	Dennis Higgins	Pg 47: As I have previously noted, 1-88 interchanges - like Rte 205 - have been omitted from the traffic study. The Town Comprehensive Plan designates this as a particularly dangerous interchange. Increased tractor trailer traffic which seems like it would be part of industrial processes, should be more carefully considered. Tractor trailers possibly carrying CNG might be needed to provide gas. Any such vehicles would be on residential roads, passing schools. It is really not clear what this statement (pg 54) is supposed to mean: "Although the number of heavy vehicles accessing the site is anticipated to increase, the percentage of heavy vehicle traffic during the AM and PM peak hours is expected to remain consistent with the existing conditions since a higher percentage of traffic entering and exiting the site will be passenger vehicles." This area is intended to house industrial facilities which do not currently exist, and those plants will require materials and will also generate and ship materials. Consequently, I do not see how any assumption can be made that the percentage of trucks to other traffic will be consistent with current use. But even in the very unlikely event this were true, a significant increase in truck traffic on Chestnut and River Streets aggravated by inadequate road width and other restrictions for heavy vehicles, would warrant more careful review. (page 66)
108	2/5/2019	Dennis Higgins	Page 71: City water source is in the Town. City water services the City and parts of the Town. Any large additional draw on City water should involve input from the Town.
109	2/5/2019	Dennis Higgins	As stated in GEIS (pg 19) "A total connected load is estimated at 7.7 MW (or 67,452 MWh/year) for the Preferred Option, considering the projected types of commercial/industrial space usage, as shown in Table 2.3.Sa. Tire capacity to supply the projected. amount of electricity needed does not currently exist at the project location." And again on pg 74: "The Henry Street substation transformer is currently at 4.5KV, but it is a dual voltage 4.8x12.5KV 14MVA bank and appears to have about 10MVA of excess capacity." See also page 78, GEIS, involving modifications to Henry Street ft is not clear from the description of required modifications whether some of these need to occur in the Town, but. as noted elsewhere, if regional electricity is already constrained. then this 7. 7MW additional load discussion has neglected to include regional stakeholders. The Public Service Commission is looking at conservation and demand response solutions to constrained gas/electricity in NYS communities and should be involved in this GEIS process. As mentioned, PSC Article 7 outlining public involvement in the review process has been ignored.
110	2/5/2019	Dennis Higgins	Chapter 4, pg 86. Cumulative Impacts Analysis fails to provide cumulative impact analysis. This section should include discussion of contaminated runoff entering wetlands. construction traffic and noise disrupting residential life in the area, greenhouse gas emissions from increased traffic as well as gas used by the rail yards occupants, dangerous tractor trailer traffic on residential streets, and so on.
111	3/5/2019	Dennis Higgins	There seems to be some confusion here on multiple fronts. The Otsego County IDA seems to think factories and gas power plants will get people to flock here the way they are flocking to Detroit. The IDA seems to think it is their job to decide what sort of energy, and what sort of development the rest of us want.

112	3/5/2019	Dennis Higgins	It would be a grave mistake to let the IDA set the energy agenda for Oneonta. The County has embarked on a regional energy review for which dozens of capable, well intentioned people have been recruited. I hope their recommendations will come from even-handed, science-based considerations and I believe, for now, we must give them the benefit of the doubt. Meanwhile, the IDA is talking to GE about turbines and considering drafting an RFP for a power plant in the railyards. We might conclude from this that the County and IDA had each left the other in the dark, except that Mr Zakrevsky of the IDA is part of that county task force. You'll recall the IDA pulled a similar stunt last August, proposing a \$17.5M decompressor which would be fueled by dozens of CNG tractor trailers daily, just like the dozens that have had accidents, been vented, or flipped over in Otsego County; just like the rollover that caused evacuations and shut down 1-88 a few days ago. As far as I can tell, neither town nor city are zoned for a gas plant. Town and City have formulated comprehensive plans to protect residents' health, quality of life, and the environment. The IDA sought no public input for its decompressor proposal and seeks no input for its current power plant venture. Yogi Berra would say: "It's like deja vu all over again." Whether the efforts of the IDA are censured or sanctioned by the county task force, whether plans for a gas plant move forward, turning the county effort into a time-wasting farce, remains to be seen. But it is, in part, up to you people here.
113	3/5/2019	Dennis Higgins	Will you consider the governor's greenhouse gas reduction goals, his plan to achieve net-zero carbon electricity from load-serving entities by 2040?
114	3/5/2019	Dennis Higgins	Will you consider the constraints imposed by climate change?
115	3/5/2019	Dennis Higgins	Will you pursue environmentally sound, sustainable development which protects citizens' health? Or will you permit the IDA to advance a private agenda?
116	3/5/2019	Dennis Higgins	A power plant or a decompressor in the railyards would be financed with our tax dollars. The public would suffer the traffic, noise, lights, and stench. Volatile organic compounds, particulate matter, ozone, and other toxic pollution would be carried by prevailing wind into the city. The public answered the IDA's decompressor proposal unambiguously with comments at town board meetings, opeds in local papers, as well as with a letter from a lawyer to Governor Cuomo and the Oneonta Town Board. You can expect much the same here.
117	3/5/2019	Dennis Higgins	Identifying GHG emissions for ORY  Energy use for ORY is a significant problem for a number of reasons. Natural gas is not currently available. Heavy industrial use may require much more gas than is identified for heating purposes.

118	3/5/2019	Dennis Higgins	<p>According to DEC SEQR policy (<a href="https://www.dec.ny.gov/docs/administration_pdf/eisghgpolicy.pdf">https://www.dec.ny.gov/docs/administration_pdf/eisghgpolicy.pdf</a>) Policies applies because "Energy use or GHG emissions have been identified as significant in a positive declaration or, as a result of scoping, are required to be discussed in an EIS."</p> <p>Quoting from Policy document:</p> <p>In cases when GHGs are analyzed in an EIS, both direct and indirect GHG emissions should be assessed. Each of these categories includes both stationary and mobile sources.</p> <ul style="list-style-type: none"> <li>• Direct GHG emissions will include both stack and fugitive emissions from combustion processes or industrial processes conducted on-site, and from fleet vehicles owned (or leased) and operated by the project proponent and associated with the project.</li> <li>• Indirect GHG emissions will include emissions generated by energy plants (offsite) supplying energy used on the site of the proposed project during its operation, and from vehicle trips to or from the project site during its operation where vehicles are not owned or operated by the project proponent (i.e. freight deliveries, employee commuting, customer visits). Another source of indirect emissions is the generation, transportation, treatment, and disposal of wastes generated at the site. Waste generation is typically reported in an EIS, and should also be evaluated for its contributions to GHG emissions and included in the quantification of total annual emissions.</li> </ul> <p>I do not see where emissions estimates are provided, even for heating costs. Heating for the ORY requires about 40 million cubic feet of gas. Here are some crude calculations. Combustion of this gas will generate 4.68 million pounds CO2 or 2,122 metric tons annually. Upstream emissions may be between 2.6% and 12%. Dr. Drew Shindel of Duke U. suggests we use 105 to 108 for methane GWP but even using 86 we could have a range of 1730 metric tons to about 8,000 metric tons C02E for upstream emissions annually. While not zoned in the city and not discussed in the GEIS, and counter to a systematic County energy review, the IDA is nevertheless talking to GE and preparing an RFP for a power plant. (See IDA minutes 12/18 and 1/19 <a href="http://otsegonow.com/wp-content/uploads/2019/02/Projects-Meeting-Minutes-January-10-2019.pdf">http://otsegonow.com/wp-content/uploads/2019/02/Projects-Meeting-Minutes-January-10-2019.pdf</a>) A 25MW power plant might have associated emissions of between 175,000 and 460,000 metric tons C02E annually. If we used a modest social-cost-of carbon figure like \$50 per short ton, simple heating for the facility will cost us \$100,000 a year. Add about \$25 million bucks in social costs for a 25MW power plant or heavy industry applications with similar gas requirements. This GEIS does not provide the estimates for GHG emissions which DEC requires.</p>
119	3/5/2019	Dennis Higgins	<p><b>Segmentation</b></p> <p>On the legality of this SEQR/GEIS process: There are circumstances in which lead agency may segment, but the City has not established that this is one of them: <b><i>SEORA regulations. provide that u[i]f a lead agency believes that circumstances warrant a segmented review, it must clearly state in its determination of significance, and any subsequent EIS, the supporting reasons and must demonstrate that such review is clearly no less protective of the environment. Related actions should be identified and discussed to the fullest extent possible. 11 6 N. Y.C.R.R. §617.3(g)(1)</i></b></p>
120	3/5/2019	Dennis Higgins	<p>NYSEG is also proposing the Deruyter 12" upgrade, which the IDA has said is related to ORY and its decompressor proposal. The proposed decompressor plant at Pony Farm, the likely development impacts at the ORY which would include costs and service demands of the Town, energy demands from a region with constrained resources, tractor trailer traffic through the Town on the order of dozens of trucks daily just to supply CNG and additional trucks for shipping --- none of these have been considered and no reason has been given to justify segmentation. We must conclude that this GEIS has failed to satisfy legal requirements.</p>



121	3/5/2019	Dennis Higgins	<p><b>Impacts</b></p> <p>According to DEC: <i>the lead agency must consider reasonably related long-term, short-term, direct, indirect and cumulative impacts, including other simultaneous or subsequent actions which are: (i) included in any long-range plan of which the action under consideration is a part; (ii) likely to be undertaken as a result thereof; or (iii) dependent thereon. 6 N. Y.C.R.R. §617.7(c)(2)</i></p>
122	3/5/2019	Dennis Higgins	<p>By state law, <i>SEQRA regulations require that an EIS assess all "reasonably related short-term and long-term impacts, cumulative impacts and other associated environmental impacts."</i> 6 N. Y.C.R.R. §617.9(b)(5)(iii)(a). In fact, the cumulative impacts section of the GEIS is empty, and realistic impacts including pollution, traffic, gas storage, frack-waste disposal from rail, and life-style impacts (noise, lights, odor) have not been assessed. The DEC SEQR states <i>When must cumulative impacts be assessed? Cumulative impacts must be assessed when actions are proposed to or will foreseeably take place simultaneously or sequentially in a way that their combined impacts may be significant. Assessment of cumulative impacts is limited to consideration of probable impacts, not speculative ones.</i></p>
123	3/5/2019	Dennis Higgins	<p>At the last hearing, a Delaware Engineering representative repeatedly used the "speculative" word. How can the problem of getting gas to a place that has no gas, but which will need lots of it, be speculative? Indeed, the IDA also proposed a decompressor with possible siting at Pony Farm park, but which the IDA may try to site in the ORY. That proposal is not speculative, and needs to be considered along with any 'generic' ORY build out. The IDA is talking to GE and formulating an RFP for a power plant in the rail yards. This is not speculative - it is in the IDA minutes for December 2018 and January 2019. Such a power plant would generate greenhouse gas emissions. It would also generate carcinogenic VOCs, and nitrogen oxide. This latter combines with other pollution to create ground-level ozone. The prevailing winds would carry toxic pollution over the city of Oneonta and any temperature inversion would trap it in the railroad/river valley. While city zoning does not allow a gas plant, a variance might enable the decompressor or power plant to be sited at ORY.</p>
124	3/5/2019	Dennis Higgins	<p>Transport of gas in significant quantities (40,000MBTU/year just for heating and domestic) must be considered. How many trucks would this be? Would trucks arrive at Pony Farm or Railyard? Would electricity demand (7.7MW) impose unreasonable constraints on the area? Power plants and heavy industry must be considered reasonable consequences of this development regardless of current zoning: These have been proposed by the applicant and are precisely why the applicant has applied to develop the area. Pipeline impacts must be considered. Lifestyle impacts from traffic, noise, light, pollution, odor; gas transmission and storage, and significant power plant pollution must be considered. These are not speculative - these have been discussed or formally proposed by the applicant. (See IDA minutes for discussion of 25% increase in gas via decompressor station, and ongoing discussions with GE and proposal for RFP for gas power plant.)</p>

125	3/5/2019	Dennis Higgins	<i>A GEIS is appropriate to consider: (1) a number of separate actions in a given geographic area which, if considered singly, may have minor impacts, but if considered together may have significant impacts; or (2) a sequence of actions, contemplated by a single agency or individual; or (3) separate actions having generic or common impacts; or (4) an entire program or plan having wide application or restricting the range of future alternative policies or projects, including new or significant changes to existing land use plans, development plans, zoning regulations or agency comprehensive resource management plans. 6 NYCRR § 617.10(a). If a GEIS is prepared "[i]n connection with projects that are to be developed in phases or stages, agencies should address not only the site specific impacts of the individual project under consideration, but also, in more general or conceptual terms, the cumulative impacts on the environment and the existing natural resource base of subsequent phases of a larger project or series of projects that may be developed in the future." 6 NYCRR § 617.10(a).</i>
126	3/5/2019	Dennis Higgins	<b>Brownfield Wetlands Flooding</b> I am concerned about flooding, brownfield contamination, and wetlands. <a href="https://www.ofoinc.org/files/8815/0884/7903/Community_Needs_Assessment_FINAL_10162017.pdf">https://www.ofoinc.org/files/8815/0884/7903/Community_Needs_Assessment_FINAL_10162017.pdf</a>
127	3/5/2019	Dennis Higgins	"Otsego County is also challenged by extreme weather conditions. The county has had 52 flooding events from 1994-2011, resulting in over \$94 million in property damage. Significant flooding events include November 2006, June 2009, and September 2011. ... "Of note, in August and September 2011, Otsego County was declared a disaster county due to flooding damage from Hurricane Irene and Tropical Storm Lee .... " If this area was underwater in recent flooding, it seems a poor choice for industrial development, possibly including gas storage, heavy industry, excessive truck traffic.
128	3/5/2019	Dennis Higgins	As Dr Bishop has observed, "concentrations of benzo[a]pyrene more than twice the commercial soil cleanup objectives (SCO's), arsenic and lead exceeding their commercial SCO's, discoloring levels of iron and manganese, and some sheen evident from uncharacterized organic liquids - all mentioned on p 33 of the dGEIS - [the City/IDA] can't very well avoid calling the development site a brownfield." Per the DGEIS, hazardous pollutants exist in the soils at ORY. A stream passes through the property. This could make attempts at providing necessary water treatment by any stormwater retention system problematic. The proposed site plan does not provide space for this such work. An inadequate stormwater treatment system, coupled with disturbance of the site by proposed development, could easily result in the leaching of hazardous chemicals from soils into the stream, into stormwater or into the Susquehanna. In 2003, the city received and EPA brownfield grant. Has public input been solicited per this grant's stipulation?
129	3/5/2019	Dennis Higgins	According to the DEC shovel-ready checklist: USEPA brownfield assessments are acceptable for this purpose, but the Pirnie Assessment was performed too long ago and also when the property was owned by a different owner. (AAI-All Appropriate Inquiry)
130	3/5/2019	Dennis Higgins	<a href="http://www.dec.ny.gov/docs/remediation_hudson_pdf/bftoolbox.pdf">http://www.dec.ny.gov/docs/remediation_hudson_pdf/bftoolbox.pdf</a> Will an environmental assessment performed several years ago meet the new AAI requirements? No. Information from older Phase I reports may be used as a resource, but the 2002 federal Brownfields Act requires that a Phase I assessment used to meet the requirements of AAI must be completed within a year prior to taking ownership of the property. This is to ensure that the current environmental status of the property is known at the time the property is transferred. In addition, certain aspects of the AAI assessment must be completed within 180 days prior to the property transfer (i.e., the on-site investigation, the records search, the interviews and the search for environmental cleanup liens). This protects the buyer from inadvertently accepting liability for contamination that may have occurred between the time the initial assessment was conducted and when the property actually transfers.pg 11 Brownfields Toolbox. <b>It could be this site is shovel ready for brownfield mitigation, but it is certainly not shovel ready for building.</b>

131	3/5/2019	Dennis Higgins	<p><b>Finance of ORY Development</b></p> <p>Public financing? For what? The Otsego IDA has a terrible track record generating the jobs they say they will generate. This should be the focal point of any PILOT consideration. Why should city and town residents subsidize the IDA? See minutes of IDA: <b>Roundhouse Road - Bond counsel, Joe Scott, advised J. Zakrevsky and the city that the city could use public funds for the use of economic development. Based on this, City of Oneonta Mayor Gary Herzig, is having city engineers prepare cost estimates for resurfacing Roundhouse Road. Otsego Now will then need to ask the City Council for financial support.</b> <a href="http://otsegonow.com/wp-content/uploads/2018/10/COIDA-Board-Meeting-Minutes-September-27-2018-1.pdf">http://otsegonow.com/wp-content/uploads/2018/10/COIDA-Board-Meeting-Minutes-September-27-2018-1.pdf</a></p>
132	3/5/2019	Dennis Higgins	<p>According to City zoning, a gas power plant is not zoned for C/I district.</p> <p><a href="https://ecode360.com/attachment/ON1737/ON1737-300b%20Bulk%20and%20Use%20Reqs.pdf">https://ecode360.com/attachment/ON1737/ON1737-300b%20Bulk%20and%20Use%20Reqs.pdf</a></p>
133	3/5/2019	Kate Higgins	<p>I came to Oneonta at the age of 17, a college student at SUNY Oneonta. I fell in love with the "City of the Hills" and went on to teach in the elementary schools and, as an adjunct instructor, at the state college. I was a full-time employee at the college for seven years. I now work from home as a software engineer. Although we moved to Otego in 2001, our family still spends much of our work and play time in the City. From gymnastics and dance classes, to household shopping, building materials and vehicle purchases, the bulk of my salary is spent here in Oneonta. Our family travels in and out of Oneonta almost every day of the week.</p> <p>As my children reach driving age, it is very concerning to read about potential railyard development without proper planning for safe traffic management. This GEIS under consideration by the City does not adequately address the issue of truck traffic, some of which may be carrying Compressed Natural Gas (CNG), in and around the City and Town of Oneonta. On Sunday, one of these top-heavy vehicles flipped on 1-88 in Cobleskill, causing homes to be evacuated and shutting the interstate down. Each vehicle has the explosive equivalent of 100 tons of TNT: I don't think City or Town residents want to see dozens of them on residential streets.</p>
134	3/5/2019	Kate Higgins	<p>Although there are some circumstances in which the lead agency may segment, the City has not established that this is one of them. SEQRA regulations ... provide that "[i]f a lead agency believes that circumstances warrant a segmented review, it must clearly state in its determination of significance, and any subsequent EIS, the supporting reasons and must demonstrate that such review is clearly no less protective of the environment. Related actions should be identified and discussed to the fullest extent possible." 6 NYCRR §617.3(g)(1)</p>
135	3/5/2019	Kate Higgins	<p>As you know, NYSEG is also proposing the Deruyter 12" upgrade, which the IDA has said is related to Oneonta Railyards. Both railyards development and the pipeline are related to the IDA's decompressor proposal. The proposed decompressor plant at Pony Farm or in the Rail yards, the heavy-industrial development at the railyard which would include costs and service demands of the Town, energy demands from a region with constrained resources, tractor trailer traffic through the Town to supply CNG and additional trucks for shipping --- none of these have been considered and no reason has been given to justify segmentation. Therefore, this GEIS has failed to satisfy legal requirements by not including the Town of Oneonta or County of Otsego as stakeholders.</p>

136	3/5/2019	Kate Higgins	At the Chamber of Commerce Energy Summit in January, Mark Davies of the City of Oneonta's Environmental Board shared the vision of an "eco-park" for the railyards. At that same Summit, geothermal engineer Jay Egg encouraged the county, towns, and the city to pursue community geothermal solutions for our energy needs. We have an opportunity to build a future which will continue to attract young people to our city and our colleges. As a mother living in this area, I ask that you read your own codes and comprehensive plan and maintain a "City of the Hills" which is a forward-thinking, healthy, sustainable community where all our children will want to settle to raise their own families. I urge the City to reject this flawed GEIS.
137	3/12/2019	Annemarie Hosnedl	I am opposed to developing any build out of infrastructure related to fossil fuels in the City of Oneonta or Town of Oneonta for many reasons. It has already been documented that this method of producing energy is dangerous and detrimental to the environment. We do not need so much fuel in our area except for few weeks in the winter. Most of the natural gas shipped into the area will then be surplus for the months when the extra is not needed. If it is available for those few institutions, then there is no incentive for them to conserve or develop more renewable sources of green energy. Renewables are the way of the future, fossil fuels are the way of the past. They will not last forever and at that point where they run out eventually, we will have to develop better ways to energize our lives. Why not be proactive and get ahead of the curve, develop something to be proud of: green space, recreational preservation of the wetlands to protect the wonderful wildlife in our area (It's a stop off for Canadian geese migration, which is a magnificent wonder to behold. I do not want the "bomb trucks" or pipelines to come into the center of town to create disasters when they roll over. There are schools and other vulnerable populations in the neighborhoods adjacent to the railyards. They should not have to worry about escalations at the drop of a hat. With a little imagination, we should be able to figure out clean industries to develop and leave the old ways to the past. I am opposed to the use of this space to benefit companies related to making a profit from fossil fuels.
138	3/15/2019	Joseph T. Malloy, PhD.	<p>My name is Joseph Malloy I hold a Ph.D in German Language and Literature from the University of Virginia and I am a Professor Emeritus at Hamilton College I am also a ham radio operator and have considerable expertise in electronics, computers, and civil defense. I have 30 years of experience in research and teaching. Thus, I am well qualified to evaluate the dGEIS from the point of view of a scholar and analytical thinker. I am also a life-long resident of New York State and a property owner. I understand well the economic needs and environmental values of central New York.</p> <p>My primary concerns regarding the DGEIS for Rail Yard development in Oneonta center on public safety</p> <p>1 The DGEIS identifies gas as the type energy required for the Rail Yard development but it does not provide a rationale for the necessity of using this particular type of energy source (a non-renewable greenhouse gas. over 80x more potent than Co2 over a 20-year time period), nor does it, as required by law, assess its impacts as an energy source. Why is natural gas the energy source of choice at this point in time and what will the impacts be on the environment and the health of the local population? I would think a more future directed approach would be to use solar or wind power. Electricity is the primary source used by loxus, one of our more successful local industries.</p>
139	3/15/2019	Joseph T. Malloy, PhD.	2. The infrastructure required to provide an adequate gas supply for Rail Yard development (eg a decompressor station and a CNG trucking plan or an expansion of the DeRuyter pipeline) is neither mentioned nor assessed for impact at local or regional levels in the DGEIS. This is an instance of illegal segmentation Why has this aspect of development been excluded from the assessment? Just this month an XNG truck had an accident on 188 that caused an evacuation As someone who has participated in emergency response communcat1ons, I can tell you that gas transport accidents are amongst the most difficult to address

140	3/15/2019	Joseph T. Malloy, PhD.	3. The current plan and technical drawing in the DGEIS includes buildings impinging on sensitive class1 wetlands. These types of wetlands are the most critical to flood mitigation, toxin sequestration/bioremediation and protection of wildlife habitat. Given that our area has had major flooding issues in the past and expects more in the future, disruption of this area could increase the risk of flooding damages and release of the toxic materials already known to be accumulated in the area as a result of the long-standing rail yard activities. What is the rationale for locating the buildings in the least advantageous place for protecting the neighbors?
141	3/15/2019	Joseph T. Malloy, PhD.	4 The DGEIS fails to identify impacts and suitable mitigation for increases truck traffic, lights, noise, odor, and pollution that inevitably accompany industrial applications How can locals prepare to adapt to this kind of development if the developer is not required to address these concerns honestly? It places an unfair economic burden on the local community if they must evaluate impact themselves in order to determine appropriate mitigation It also increases the likelihood that mitigation will only occur after there has been a problem.
142	3/15/2019	Joseph T. Malloy, PhD.	5. The DGEIS omits a specific attention to impacts on vulnerable populations such as children, the elderly, and the infirm. Further, impacts on other segments of the local population who regularly pass, cross, or are exposed to this space (pedestrians, bicyclists, school children) have not been addressed This is a concern for health and safety for our whole community. Why were these special populations not considered?
143	3/15/2019	Joseph T. Malloy, PhD.	6 The town of Oneonta has been omitted from the SEQR/ DGEIS review process, yet tractor trailers and other traffic will of necessity pass through the town in order to access this development from the interstate What is the rationale for splitting the needs of the town from the needs of the city when it comes to the environmental impact of a project whose stated goal it to alter both the economy and the infrastructure of the entire region?
144	3/15/2019	Joseph T. Malloy, PhD.	Finally, this proposal reads like we are preparing infrastructure for industry of the 1950's. Where is the vision for technology friendly, future directed growth in Oneonta?
145	not dated	Carolyn Merteir	I am very confused by this document. Appendix A is mostly illegible.
146	not dated	Carolyn Merteir	The project is said to be 200 acres including 17 individual parcels. The traffic study is for 50 acres bordered by Ceperley Avenue, Chestnut Street Fonda Avenue and the railroad tracks. This is Option 3 aka the preferred plan.
147	not dated	Carolyn Merteir	The parking study does not cover any of the site at all. Options 1A, 1B and 2 all include construction outside the studied area.
148	not dated	Carolyn Merteir	There is no study of air quality.
149	not dated	Carolyn Merteir	Residents, walkers, and workers in the area will be relieved to know there will be no blasting during construction. However there is no mention of mitigation of the diesel fumes from the construction vehicles or the dust from the disturbed possibly polluted earth. There should be an undertaking for the use of the latest technologies to minimize pollution from diesel. I don't know what can be done about dust, but there should be something.

150	not dated	Carolyn Merteir	<p>I am not sure how this DGEIS can be properly considered when details of the project are so vague.</p> <p>Page 9: At the time a site a specific project is determined, additional review under SEQR may be necessary.</p> <p>Page 17: As specific development plans are prepared, NYSEG will be required to provide more details on up-grades, conversions, construction, and costs to customers.</p> <p>Page 74: Depending on the final redevelopment design plan, and what type of industry are housed there, the project may have high energy demands. I think I would like to know the plan and then judge the environmental impacts specific to that plan.</p>
151	3/11/2019	Jan Mulroy	<p>RE: Comments, dGEIS, Redevelopment Master Plan Oneonta Railyards, City of Oneonta, Otsego County, New York Shovel Ready</p> <p>In 2003, the City of Oneonta was awarded a \$200,000 grant for hazardous substances from the USEPA, "used to conduct Phase I and Phase II assessments of parcels within the industrial park, prepare conceptual reuse plans to support sustainable long-term development, and involve the community in key planning decisions."</p> <p><a href="https://nepis.epa.gov/Exe/ZyPDF.cgi/PIOOD050.PDF?Dockey=PIOOD050.PDF">https://nepis.epa.gov/Exe/ZyPDF.cgi/PIOOD050.PDF?Dockey=PIOOD050.PDF</a>The</p> <p>GEIS states "A soil evaluation of the former D&amp;H Rail Yard Area was conducted by Malcolm Pirnie, Inc., for the Oneonta River Corporation through the USEPA Brownfields Assessment Program Phase 1 (2005) and Phase 2 (2006) Environmental Site Assessments." The GEIS, however, did not include this report. There was not a map of the sample sites. There was no indication given as to the outcome of this assessment; would NYS require remediation before any development took place?</p> <p>February 19, 2008, City Common Council Meeting Minutes reveal the zoning change to industrial, for the Oneonta Railyards:  "The Council also adopted a significant zone change in the rail yards-a change that is consistent both with the area's status as an empire zone and the preferred option outlined in the Railyards Market Report and Master Plan".  REGULAR MEETING OF THE COMMON COUNCIL VOL. 4, PG. 580 Pg. 583  <a href="https://www.ecode360.com/documents/ON_173_7/pub_1_ic/344738534.Pdf">https://www.ecode360.com/documents/ON_173_7/pub_1_ic/344738534.Pdf</a></p> <p>April 12, 2017, Common Council Meeting minutes "Discussion on status of railyards project- Otsego Now purchased 80 acres and will create a shovel-ready site for manufacturing center".  SPECIAL MEETING OF THE COMMON COUNCIL VOL. 11, PG. 47  <a href="https://www.ecode360.com/documents/ON1737/public/388969366.pdf">https://www.ecode360.com/documents/ON1737/public/388969366.pdf</a></p> <p>Shovel-ready loosely means that developers have passed through most regulatory "hoops". Empire State Development, through a formal Shovel-Ready Certification program, explains "The Shovel Ready Certification program enables a developer to work with New York State in successfully achieving required permits for their economic development site, prior to a business expressing interest in a location. Pre-approving and pre-permitting these sites reduces development delays and construction costs, saving companies interested in expansion or relocation, time and money."  <a href="https://esd.ny.gov/businessprograms/shovelready.html">https://esd.ny.gov/businessprograms/shovelready.html</a></p>

152	3/11/2019	Jan Mulroy	<p>The GEIS does not mention the desired status of completing an Empire State Development Shovel-Ready Certification. Rather, the GEIS states: 3.2.3 Mitigation Measures, pg.34 Past land uses of the Study Area left remnants in the form of structures, construction/demolition debris and trash that affect the Study Area today. Site preparation prior to any future construction activities will require removal of existing structures and demolition debris. It may be possible to access funding, or tax credit, under the NYS Brownfields Program for assessment and removal of the smoke stack and coaling tower.</p> <p>A brownfield site is defined in New York State Environmental Conservation law as" ... any real property where a contaminant is present at levels exceeding the soil cleanup objectives or other health-based or environmental standards, criteria or guidance adopted by DEC that are applicable based on the reasonably anticipated use of the property, in accordance with applicable regulations." Pg. 3 <a href="http://www.dec.ny.gov/docs/remediation_hudson_pdf/bftool_box.Pdf">www.dec.ny.gov/docs/remediation_hudson_pdf/bftool_box.Pdf</a></p>
153	3/11/2019	Jan Mulroy	The GEIS, when relating the findings of the Phase II report from 2006, describes values as "slightly greater than, greater than and exceeds" for 9 different values.
154	3/11/2019	Jan Mulroy	It is unclear that what is affecting the Study Area "today" was ever included in the assessment from 2005 and 2006. It is unclear if there may be hazardous materials involved. To suggest that it may be possible to access funding for assessment and removal of the smoke stack and coaling tower would leave a developer far from "shovel-ready".
155	3/11/2019	Jan Mulroy	The GEIS, Appendix C, NRCS Soil Survey Data, discusses the type of soils in the Study Area. Udorthents, smoothed (Ue) is described as covering 59.8 acres of the Study Area. What is not described in the GEIS, but further described in part, in the NRCS reference about Ue is this: <a href="https://www.nrcs.usda.gov/Internet/FSE_MANUSCRIPTS/new_york/NY077_10/0tsego.pdf">https://www.nrcs.usda.gov/Internet/FSE MANUSCRIPTS/new york/NY077_10/0tsego.pdf</a> One of the largest areas of this unit is in the southern part of the county along Interstate 88. This large area is the result of road construction. In and around the city of Oneonta, areas of this unit have a substratum that is largely coal ash and cinders. Also included are a few very small spots that have a refuse substratum containing such fill materials as garbage; tires; coal ash and cinders; construction and demolition materials, including wood, bricks, blocks, and concrete chunks; and tree stumps or branches. Some areas of this unit along the Susquehanna River are subject to flooding. Pg. 265
156	3/11/2019	Jan Mulroy	What is worrisome is the possibility of a substratum that is largely coal ash and cinders. The GEIS does not provide specifications for the building of the bridge or rail sidings. Would the building of these structures disturb the substratum unleashing coal ash and cinders? The construction of any of the buildings? The construction of parking lots and improvements to or the moving and rebuilding of Roundhouse Road?
157	3/11/2019	Jan Mulroy	<p>The EPA explains why it regulates coal ash: <a href="https://www.epa.gov/coalash/coal-ash-basics">https://www.epa.gov/coalash/coal-ash-basics</a></p> <p>Coal ash contains contaminants like mercury, cadmium and arsenic. Without proper management, these contaminants can pollute waterways, ground water, drinking water, and the air.</p> <p>Indeed, the GEIS, from the Phase II report of 2006, relates "Arsenic concentrations exceeded the Part 375 Commercial SCO of 16 mg/kg in three samples of sediment, four surface soil samples and four soil boring locations."</p> <p>Besides this 59.8 acres of Ue type soil, there are 26.9 acres of Federal and or State protected wetlands, a navigable stream and tributary to the Susquehanna River, and under all of this, the shallow sand and gravel aquifer, having high transmissivity and capable of producing 100 gallons a minute of water. There would be much harm to these waters to expose them to "mercury, cadmium, and arsenic".</p>

158	3/11/2019	Jan Mulroy	The GEIS is far from having described any certainty that the Oneonta Railyards is shovel-ready nor has it provided specific steps in mitigation planning as it relates to the "brownfields" designation that has been attributed to this site.
159	3/11/2019	Jan Mulroy	That this is a "generic" environmental statement, you would have to assume full buildout of the preferred master plan. Please do not accept this dGEIS as investigated and written. There are too many unanswered questions as to the safety of humans and to water and air, to occupy and develop the Oneonta Railyards.
160	2/5/2019	Otsego County Conservation Assoc.	The Preferred Redevelopment Plan should contain additional detail to <u>provide a more thorough understanding of the environmental impacts of the proposed project</u> . On Pages 3 and 4 of the DGEIS, it is stated that the one of the goals of the proposed project is to develop a "Redevelopment Master Plan and Economic Development Strategy," for the Oneonta Railyards Site. The intention of this plan is, ostensibly, to guide the development of a new industrial/commercial business park: <sup>3</sup> The Preferred Redevelopment Master Plan is presented to reviewers on Pages 13-25 of the DGEIS.
161	2/5/2019	Otsego County Conservation Assoc.	On Page 52 of the DGEIS, it is stated that the "Redevelopment Plan is based on a five-year buildout plan which is considered to be the most expeditious timeline for redevelopment ... " A five-year buildout plan could extend beyond 4-year Common Council terms and 3-year Planning Commissioner terms. Therefore, it is critical to provide a detailed plan which outlines preferred approaches to wetland mitigation, stormwater mitigation, lot coverage reduction, energy development, encouragement of public transportation, utilization of green infrastructure, and modern design standards.
162	2/5/2019	Otsego County Conservation Assoc.	OCCA's review of the preferred redevelopment plan indicates that redevelopment projects will largely be considered on a case by case basis. However, as explained in more detail below, it is unclear what the Applicant's preferred approach to common environmental issues that could arise from redeveloping the site. These issues include but are not limited to how stormwater impacts will be managed throughout the whole 50 acre site, how wetlands impacts will be mitigated and monitored, what type of energy infrastructure would be preferred for the redevelopment of the site, and how impervious surfaces will be minimized. Further, the map listed identifying the preferred buildout option does not include information on where potential energy development would be located and indicate where potential road improvements would need to be made moving forward.
163	2/5/2019	Otsego County Conservation Assoc.	OCCA recognizes that, at a minimum, redevelopment projects are anticipated to comply with relevant local, state, and federal regulations. However, OCCA contends that a case-by-case approach to reviewing potential projects can lead to a full buildout that is less environmentally protective than a detailed, well designed master plan which developers can utilize as a guide. As such, OCCA recommends that subsequent drafts of the GEIS be revised to identify preferred mitigation strategies for stormwater impacts, wetland impacts, energy development, and impervious surface reduction.
164	2/5/2019	Otsego County Conservation Assoc.	<u>The Applicant should take due care to avoid illegally segmenting the review of the proposed project</u>



165	2/5/2019	Otsego County Conservation Assoc.	<p>As presented on Pages 16-17 of the DGEIS, the full buildout of the Oneonta Railyards will require the expansion of energy resources namely electric and gas infrastructure to serve the site. Additionally, it is stated on Page 105 that possibilities for energy will be considered on a case-by-case basis-most likely by the Planning Commission and the Applicant. When considering projects with multiple phases, stages, parts or segments, the SEQRA handbook establishes eight basic questions that should be addressed:</p> <ol style="list-style-type: none"> <li>(1) Is there a common purpose or goal for each segment?</li> <li>(2) Is there a common reason for each segment being completed at about the same time?</li> <li>(3) Is there a common geographic location involved?</li> <li>(4) Do any of the activities being considered for segmentation contribute toward significant cumulative or synergistic impacts?</li> <li>(5) Are different segments under the same ownership or control?</li> <li>(6) Is a given segment a component of an identifiable overall plan?</li> <li>(7) Can the interrelated phases of various projects not be considered "functionally independent?"</li> <li>(8) Does the approval of one phase or segment commit the agency to continuing with the other phases?</li> </ol>
166	2/5/2019	Otsego County Conservation Assoc.	<p>Furthermore, §617.7(c)(2) of SEQRA requires lead agencies to consider reasonably related long-term, short-term, and cumulative effects, including other simultaneous or subsequent actions which are: (1) included in any long-range plan of which the action under consideration is a part; (2) likely to be undertaken as a result thereof; or (3) dependent thereon. On Page 86 of the GEIS, it is stated that the "cumulative impact of the proposed Master Plan and other proposed projects that existed at the time of receipt of the initial EAF will be discussed. On Page 52 of the DGEIS, it is stated that the most expeditious timeframe for redevelopment of the railyards site is five years. Further, according to the Oneonta Railyards Development Phases document, the project will be constructed in four phases. For the following reasons, OCCA believes that the project could be impermissibly segmented unless proper precautions are undertaken.</p>
167	2/5/2019	Otsego County Conservation Assoc.	<p>There is no rationale included on Page 86 of the DGEIS discussing why the date of submission of the initial EAF was chosen. This is even though on Page 17 of the DGEIS, it is stated that while the project will require 40,000 MMBtus/year, and there is currently not any gas capacity to serve the site. The establishment of the 2017 deadline for consideration of cumulative impacts prohibits the Common Council from considering projects like the proposed decompressor station in the Town of Oneonta.</p>
168	2/5/2019	Otsego County Conservation Assoc.	<p>On July 26, 2018, a Consolidated Funding Application (CFA) was submitted by the Applicant to construct a natural gas decompression station in the greater Oneonta area. According to an August 8, 2018, YouTube video covering the August 8 Oneonta Town Board meeting, the Applicant stated that the Oneonta Rail yard redevelopment was one of the primary drivers behind the construction and sizing of the decompression station (see timestamps 11:34-12:09 and 13:41-14:06). In fact, the natural gas usage estimates prepared by Delaware Engineering for the Railyard redevelopment were utilized by New York State Gas &amp; Electric (NYSEG) to size the proposed decompressor station. Indeed&gt; these statements were corroborated on record by the Applicant during the September 10, 2018 OCCA Board of Directors meeting. Additionally, according to a 2016 Railyard Study and Economic Development Plan prepared by Clark Patterson Lee Feasibility Study, 8,500 linear feet of new natural gas mains would have to be constructed to properly service the Railyard Site. While it should be noted that CF A submittal for the decompression station was denied, there is no evidence that the decompression station project will no longer be considered by the Applicant. Given the connections between planned natural gas development and the proposed project, OCCA argues that the impacts of natural gas development must be considered alongside the proposed project.</p>

169	2/5/2019	Otsego County Conservation Assoc.	Second, courts have held that infrastructure projects related to planned development must have their environmental impacts considered together. In <i>Town of Blooming Grove v. County of Orange</i> (2013), the court found that an agency had improperly segmented its environmental review when it issued a negative declaration for a critical infrastructure component related to a mixed-use development for which an EIS was being prepared. <sup>4</sup> The construction of the project was contingent on, among other things, Orange County's guarantee of adequate sewer capacity. The County of Orange issued a negative declaration and ultimately approved an extension of the sewer district. This led to the court ruling that the project was improperly segmented because the record established that the project and the sewer district extension were part of an "integrated and cumulative development plan sharing a common purpose {Gerrard, Ruzow & Weinberg, 2018}." On page 105 of the DGEIS, it is stated that possibilities for energy will be considered on a case-by-case basis. Should any energy possibility be proposed to service the proposed site it is critical that the associated impacts of said energy development be considered alongside the overall impacts identified by the DGEIS. Failure to consider the environmental impacts related to the construction of associated energy projects to serve the project site could leave the City and the Applicant vulnerable to legal challenge.
170	2/5/2019	Otsego County Conservation Assoc.	Third, according to Environmental Conservation Law (ECL) §8-0105(4)(i) and §617.2(b)(1Xiii) of SEQRA, SEQRA applies to actions undertaken by other persons in which an agency is called upon to provide some form of funding assistance. The regulations further define such funding to include: financial support given by an agency including contracts, grants, subsidies, loans, or other forms of direct or indirect financial assistance, in connection with a proposed action (SEQ RA §617.2(q)). These provisions were upheld in <i>Bardon v. Town of North Dansville</i> (1987) where a request for funding to build a food processing plant was found to be an "action," subject to review under SEQRA. <sup>5</sup> This is because §617.3(g) of SEQRA requires all steps associated with an action to be considered at once.
171	2/5/2019	Otsego County Conservation Assoc.	As presented on Page 9 of the CFA Application prepared by the Applicant it is stated " <i>The project involves the expansion of natural gas infrastructure to allow the development of two business parks in Oneonta. Currently, there is no additional natural gas supply for new businesses looking to expand or move into either the Oneonta Railyard Industrial Park or the Pony Farm Industrial Park. By providing additional natural gas to the region, additional businesses can expand and make available employment opportunities to veterans and their families.</i> "
172	2/5/2019	Otsego County Conservation Assoc.	The CPA Application was submitted without a coordinated SEQRA review being underway. A coordinated review could have assisted the Applicant and the Common Council with making changes to the DOBIS to reflect the potential impacts of the decompressor project. It would have also provided the City and Town of Oneonta a venue for coordination and planning related to energy development and any interrelated projects in the proverbial pipeline.
173	2/5/2019	Otsego County Conservation Assoc.	Finally, Section 9.0 of the DGEIS does not establish specific mitigation measures or preferred types of energy development that would facilitate the redevelopment of the Oneonta Railyards. Nor are specific conditions related to the minimization of the environmental impacts related to energy development discussed. Rather, a slate of possible energy sources that could be used to power the railyard are discussed. This would require future reviewing bodies like the Planning Commission to evaluate the environmental impacts of new energy development. This could create the potential for segmentation-especially if multiple types of energy development are identified.

174	2/5/2019	Otsego County Conservation Assoc.	To avoid segmenting the review of the proposed project, OCCA recommends that Delaware Engineering works with the Applicant and the Common Council to review the end date for projects considered in the DGEIS' cumulative impact analysis to cover the submission of the CFA submittal for the proposed decompression station. Additional revisions to the DGEIS should be made as a result. OCCA further recommends that energy alternatives examined as part of the DGEIS include an evaluation of each alternative's environmental impacts, potential mitigation measures, and the identification of a preferred energy development regime. This analysis should include plans for intermunicipal coordination if a supporting energy infrastructure project for the Oneonta Railyards is in another municipality like the Town of Oneonta. It should be noted that OCCA acknowledges that project reviews can be segmented if the Lead Agency can demonstrate how the segmentation of the project review will be no less protective of the environment.
175	2/5/2019	Otsego County Conservation Assoc.	<u>The City should ensure better coordination with the Planning Commission in the development of the Final GEIS to ensure that the Commission has the capacity to fairly and thoroughly review the Site Plan Applications.</u> As presented on Pages 22 and 25, the Planning Commission will be tasked with utilizing the FOEIS as a reference in reviewing, approving, approving with modifications, or denying Site Plan Applications for redevelopment in the Oneonta Railyards. The DOBIS was provided to the Planning Commission for review on January 16, 2019 -just over two weeks before the February 5, 2019 public hearing on the proposed project. It should be noted that the Planning Commission will meet on February 20, 2019-two days prior to the public comment deadline. OCCA recognizes that the City of Oneonta's Common Council is acting as lead agency for the purposes of the review of the DGEIS. However, since the Planning Commission will be the main entity administering the document as future development projects are proposed, it is important that the preparation of subsequent drafts of the GEIS are coordinated between City committees.
176	2/5/2019	Otsego County Conservation Assoc.	Given the multitude of mitigation measures recommended in the DGEIS, it is critical that the Planning Commission develop the capacity to ensure that the mitigation measures are implemented evenly and consistently over the course of a multi-year redevelopment plan. As mentioned above, a multi-year redevelopment plan does not typically consider political terms, the terms of planning commissioners, or changes in staffing within involved agencies. As such, OCCA recommends that the City work with Delaware Engineering to schedule trainings on how to properly utilize the GEIS and the master redevelopment plan and economic development strategy as too.ls for reviewing potential Site Plan Applications.
177	2/5/2019	Otsego County Conservation Assoc.	<u>The conceptual plans listed in the DGEIS are not consistent with other plans listed on the Otsego Now website</u> The DGEIS lists five conceptual plans for the potential development of the Oneonta Railyards Site for consideration by the Common Council (as lead agency) and the Planning Commission. However these plans are inconsistent with those presented in the 2016 Clark Patterson Lee report listed on the Otsego Now website, the "Preferred Site Options," document listed on the Otsego Now website, and the "Oneonta Railyards Fact Sheet," document also listed on the Otsego Now website. Most notably, the DGEIS suggests that the Option 3 is the preferred option for redeveloping the project site. This statement could be confusing for reviewers as the 2016 Clark Patterson Lee Report and the "Preferred Site Options," document both have redevelopment plans listed as "Option 3." OCCA recommends that the Otsego Now website be updated to reflect only the most current conceptual plans being under consideration by the Common Council.

178	2/5/2019	Otsego County Conservation Assoc.	<u>The Applicant should analyze the Greenhouse Gas (GHG) emissions related to the proposed project</u> According to the Final Scoping Statement issued on May 15, 2018, the energy related impacts of the proposed project were identified as an area deserving additional scrutiny in the DGEIS. Since the main source of GHG emissions is the generation of energy and that Massachusetts v. EPA (2007) established carbon dioxide as an air pollutant, OCCA contends that GHG emissions should be included in the DGEIS.6 In fact, the DEC codified the requirements that EISs should discuss ""measures to avoid or reduce both an action' i impacts. on climate change and associated impacts due to the effects of climate change on sea level rise and flooding,,. According to Gerrard, Ruzow & Weinberg (2018), the DEC has published guidance on assessing energy use and GHG emissions in environmental impact statements.
179	2/5/2019	Otsego County Conservation Assoc.	In the DEC guidance document, it is recommended that the Applicant examine direct GHG emissions (e.g., emissions from vehicle fleets1 and stack/fugitive combustion processes) and indirect GHG emissions (e.g., emissions from offsite energy plants supply energy used by the project). Most importantly the guidance document calls for calculations of the proposed reduction in GHG emissions that will result from mitigation measures, and where practicable, a quantification of reductions in GHG emissions that would result from mitigation measures that were considered and rejected (Gerrard, Ruzow & Weinberg, 2018).
180	2/5/2019	Otsego County Conservation Assoc.	As presented on Page 27 of the DGEIS, the Applicants Preferred Alternative involves the construction of a maximum of 913,125 square feet of commercial and/or industrial space, may require more than 7.7 MW of electricity, and require approximately 40,000 MMBtu/year of natural gas for heating and cooling. This would require upgrading current electric infrastructure and, potentially, the expansion of natural gas infrastructure to the site. While it is commendable that the Applicant is examining alternative types of energy generation on the project site, the Applicant has failed to include any analysis of GHG emissions or the potential GHG emissions reductions that could be realized by incorporating more renewable energy options in the final project design. Given the connection between energy generation and distribution and GHG emissions, OCCA recommends that a GHG analysis which includes the overall direct and indirect GHG emissions related to the project be incorporated into subsequent drafts of the DGEIS.
181	2/5/2019	Otsego County Conservation Assoc.	<u>The Applicant should clarify what type of engineering and design practices would need to be utilized to overcome poor soil conditions for stormwater management on the project site</u> Page 41 of the DGEIS discusses the adequacy of soils onsite for common stormwater management practices. It is noted that the Carlisle muck and Wayland soils are rated as most limited for infiltration, pond or artificial wetland practices due to the shallow depth to saturated soils. Additionally, Chenango Gravelly Silt Loam soils on site are rated somewhat limited due to excessive permeability. The three soil groups comprise 48% of the project site. The DGEIS subsequently notes that the limitations cannot be overcome without major soil reclamation and special engineering design and construction procedures. However, these procedures are not detailed in the DGEIS nor are they included in the Redevelopment Master Plan and Economic Development Strategy. Since subsequent development applications will be expected to overcome soil limitations onsite, OCCA recommends that these procedures are incorporated into Section 3.1.3 of the DGEIS.
182	2/5/2019	Otsego County Conservation Assoc.	<u>The Applicant should consider analyzing the Vehicle Miles Traveled related to automobile travel generated by the proposed project and associated environmental impacts</u> The Traffic Impact and Access Study prepared by VHB (Section3.4 and Appendix F) analyzes a wide range of potential traffic impacts related to the proposed project including but not limited Traffic Operations (level of service, etc.), existing roadway geometry, existing traffic volumes, vehicular crash history, and multimodal accommodations. While many of the aforementioned topics deal with traffic safety and flow, they do not capture the true environmental impacts related to automobile travel.

183	2/5/2019	Otsego County Conservation Assoc.	<p>According to Fang &amp; Volker (2017), to combat climate change and reduce greenhouse gas (GHG) emissions, cities, regions and states across the United States are beginning to consider transportation metrics that more closely approximate the true environmental impacts of driving. 8 One particularly common metric is the utilization of Vehicle Miles Traveled (VMT).</p> <p><sup>8</sup> Fang, K., &amp; Volker, J. (2017). <i>Cutting greenhouse gas emissions is only the beginning: A literature review of the co-benefits of reducing vehicle miles traveled</i> (No. NCST-20170300).</p>
184	2/5/2019	Otsego County Conservation Assoc.	<p>According to the 1990-2015 New York State Greenhouse Gas Inventory prepared by the New York State Energy Research and Development Authority (NYSERDA), the transportation sector accounts for 33% of the overall GHG emissions across the state's economy. Furthermore, Governor Cuomo's 2016 Clean Energy Standard (CES) mandates cutting GHG emissions by 40% from 1990 levels and 80% by 2050. States with similar GHG emissions reduction targets like California have already found that reducing VMT will be integral in reducing GHG emissions in the transportation sector-going as far as to require VMT analyses in the preparation of Environmental Impact Reports (Fang &amp; Volker 2017; Governor's Office of Planning and Research, 2018).9</p> <p><sup>9</sup> <a href="http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf">http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf</a></p>
185	2/5/2019	Otsego County Conservation Assoc.	<p>While the analysis of VMT is not required in the SEQRA review process, it is germane to this discussion for several reasons. The transportation sector is a major source of air emissions. Tailpipe emissions can include carbon monoxide (CO), nitrous oxide (NOx), Sulphur oxide (SOx), particulate matter, and carbon dioxide (CO2). Fang &amp; Volker (2017) find that reductions in on-road transportation could substantially reduce the emissions of these criteria pollutants. Additionally, VMT reductions substantially reduce the lifecycle GHG emissions related to automobile usage such as vehicle manufacture, roadway construction, and roadway maintenance (Chester &amp; Horvath. 2009).10 Factoring in life cycle emissions related to automobile usage increases the effective emission from road vehicles by approximately 63% over tailpipe emissions alone.</p> <p><sup>10</sup> Chester, M. V., &amp; Horvath, A. (2009). <i>Environmental assessment of passenger transportation should include infrastructure and supply chains. Environmental research letters, 4(2), 024008.</i></p>
186	2/5/2019	Otsego County Conservation Assoc.	<p>From a water pollution perspective, motor vehicle travel can cause the deposition of pollutants onto roadways which can then be carried by stormwater runoff into waterways. For example, fuel, oil, and other liquids can leak from vehicles onto the ground. Brake dust and tire compounds can be deposited into waterways as well. Nixon &amp; Saphores (2003) estimate that, in California alone, 212,000 pounds of copper, 13,280 pounds of lead, and 92,800 pounds of zinc in stormwater are attributable to brake pad dust.11 Regarding traffic safety, Fang &amp; Volker (2017) cite 2015 statistics from the Bureau of Transportation Statistics which show a strong positive correlation (r=0.82) between increased VMT and traffic fatalities.12</p> <p><sup>11</sup> Nixon, H., &amp; Saphores, J.-D. (2003). <i>The Impact of Motor Vehicle Operation on Water Quality: A Preliminary Assessment.</i> UC Irvine Institute of Transportation Studies  <sup>12</sup> United States Bureau of Transportation Statistics. (n.d.). <i>State Transportation Statistics 2015.</i> Retrieved from <a href="http://www.rita.dot.gov/bts/sites/rita.dot.gov/bts/files/publications/state_transportation_stat">http://www.rita.dot.gov/bts/sites/rita.dot.gov/bts/files/publications/state_transportation_stat</a></p>
187	2/5/2019	Otsego County Conservation Assoc.	<p>According to Page 27 of the City of Oneonta's Draft Comprehensive Plan, the average commute time to the City of Oneonta is just over 15 minutes. Ostensibly with the development of the Oneonta Railyards site, more people will be commuting to the City for work leading to an overall increase in the amount of VMT per capita. While traffic safety, multimodal transportation, and flow are examined the environmental impacts related to traffic generation including but not limited to truck, automobile and train-based transport are not analyzed. As such, OCCA recommends that a VMT analysis for the Oneonta Railyard be incorporated into subsequent drafts of the GEIS.</p>

188	2/5/2019	Otsego County Conservation Assoc.	<p>The Applicant should develop and include wetland mitigation and monitoring strategies in subsequent drafts of the GEIS. According to the DGEIS, there are two identified State-regulated freshwater wetlands, ON-7 (29.6 acres) and ON-9 (28.3 acres) within the proposed project site.<sup>13</sup> Both wetlands are considered Class 1 wetlands. These wetlands "provide the most critical of the State's wetland benefits, reduction of which is acceptable only in the most unusual circumstances."<sup>14</sup> The OOEIS estimates that there are approximately 26.9 acres of potentially federal jurisdictional wetlands within the study area. The DGEIS estimates that a maximum of 8.1 acres of regulated wetlands will be lost as a result of the full buildout of the Oneonta Railyard Sites. Such activity will require potential developers to obtain state and federal permits as per Clean Water Act Section 404 and New York State Environmental Conservation Law Article 24 stipulations.</p> <p><sup>13</sup> DGEIS Page 37  <sup>14</sup> DGEIS Page 44</p>
189	2/5/2019	Otsego County Conservation Assoc.	<p>Wetlands provide several key ecosystem services including but not limited to flood attenuation, habitat, water filtering, water supply, and biodiversity maintenance. Several studies have placed an economic value on these ecosystem services. For example, a 2004 estimate by the Worldwide Fund for Nature, suggests that the median economic value of wetlands is \$5,582 per acre. <sup>15</sup> Adjusting for inflation, the median economic value of wetlands per acre in 2017 would be \$7,385. The DGEIS recommends that compensatory mitigation be conducted onsite with specific mitigation measures being explained during the permitting process.</p> <p><sup>15</sup> <a href="http://forestandrange.org/new_wetlands/economics_and_recreation.htm">http://forestandrange.org/new_wetlands/economics_and_recreation.htm</a></p>
190	2/5/2019	Otsego County Conservation Assoc.	<p>On Page 43 of the DGEIS, it is stated that monitoring of wetland restoration and remedial work is required. The wetlands and the unnamed Class C Stream are tributary to the Susquehanna River and due care should be exercised to ensure that wetland restoration strategies are effectuated. It is also stated on Page 43 of the DGEIS that the monitoring plans will be submitted as part of state and federal permitting processes, with interagency consultation occurring as each application is submitted. However, a preferred wetland monitoring and remediation strategy is not included in the DGEIS. The DGEIS encourages, but does not require, Applicants to consult with all regulatory parties early in the redevelopment design phase to assure the adequacy of proposed mitigation measures. OCCA argues that this does not provide assurances that restoration and monitoring strategies will be conducted in a consistent manner and could create a situation in which duplication of efforts is conducted. Projects will be proposed over the course of several years, with the potential for changes in the Planning Commission and Common Council remaining. As such, OCCA recommends that the Applicant work with Delaware Engineering to develop a preferred wetland restoration and monitoring strategy in subsequent drafts of the DGEIS which Applicants are required to adhere to.</p>
191	2/5/2019	Otsego County Conservation Assoc.	<p>The Applicant should provide additional detail on how stormwater impacts will be evaluated and mitigated. On Page 40 of the DGEIS it is stated that construction projects involving the disturbance of one or more acres must obtain coverage under the State Pollution Discharge Elimination System (SPDES), New York State Department of Conservation (DEC) General Permit for Stormwater Discharges from Construction Activities (GP-0-15-002). This will require each future Applicant to prepare a detailed Stormwater Pollution Prevention Plan (SWPPP) which explains their plans to mitigate potential environmental impacts related to stormwater runoff.</p>

192	2/5/2019	Otsego County Conservation Assoc.	The DGEIS generally discusses mitigation measures that could be undertaken by future Applicants such as minimizing impervious surfaces and maintaining as much of the site's natural hydrology as possible. However- the DGEIS fails to identify the Applicant's preferred stormwater mitigation techniques, whether green infrastructure (permeable pavers, bioswales, rain gardens, etc.) and low impact development techniques will be utilized by potential applicants, and how water quality will be monitored in the onsite Class C stream and wetlands that are tributary to the Susquehanna River. Further, as discussed below, the site does contain soils with challenging conditions for stormwater management like Carlisle muck and Wayland soils. These soils create challenging conditions for infiltration, ponds- or other artificial wetland stormwater practices due to the shallow depth to saturated soils.
193	2/5/2019	Otsego County Conservation Assoc.	Applications for development on the project site will occur on a case-by-case basis, with the full buildout of the site covering 50 acres. Given the long-term nature of the proposed project, OCCA believes that it would be prudent to develop a preferred SWPPP that can act as a template for future development to utilize. Tots document would include additional detail on the stormwater mitigation techniques that could be utilized to minimize runoff, additional detail on construction monitoring to ensure no runoff leaves the site and plans for monitoring water quality onsite to ensure that the stormwater mitigation features are working appropriately.
194	2/5/2019	Otsego County Conservation Assoc.	<u>The Applicant should clarify whether neighboring municipalities such as the Town of Oneonta were consulted as part of the DGEIS preparation process</u> OCCA's review of the DGEIS indicates that there are no sections detailing the public engagement efforts undertaken by Delaware Engineering and the Common Council related to the proposed projects. There were public presentations made on April 4th at Riverside Elementary School and April 5th at Greater Plains Elementary School on the Draft Scoping Statement. However, there is no indication in the document of additional public outreach efforts made regarding the project. Most importantly, it is unclear if the Town of Oneonta was consulted as an interested agency during the preparation of the DGEIS. The Town of Oneonta was listed as a potential location for the decompressor station project-which would have been connected to the Oneonta Railyards via underground pipe. Additionally, given that traffic from the project will be flowing to and from the Oneonta Railyards through Ceperley Avenue, Fonda Avenue, and Lower River Street, it is unclear if meetings were held with Town officials to discuss collaboration opportunities on traffic calming and multimodal transportation options. Further, the public can and should play a role in the development and planning process related to the Oneonta Railyards. Effective public engagement can lead to sites that are designed to blend into the community, improve community character, and sites that contribute jobs best suited for local workforces. OCCA recommends that subsequent drafts of the DGEIS include a public engagement section detailing outreach efforts made by the Common Council, Delaware Engineering, and the Applicant.
195	2/5/2019	Otsego County Conservation Assoc.	The Preferred Redevelopment Plan should contain additional detail to provide a more thorough understanding of the environmental impacts of the proposed project
196	2/5/2019	Otsego County Conservation Assoc.	The Applicant should take due care to avoid illegally segmenting the review of the proposed project
197	2/5/2019	Otsego County Conservation Assoc.	The City should ensure better coordination with the Planning Commission in the development of the Final GEIS to ensure that the Commission has the capacity to fairly and thoroughly review future Site Plan Applications
198	2/5/2019	Otsego County Conservation Assoc.	The Conceptual Plans listed in the DGEIS are not consistent with other plans listed on the Otsego Now website

199	2/5/2019	Otsego County Conservation Assoc.	The Applicant should analyze the Greenhouse Gas (GHG) emissions related to the proposed project
200	2/5/2019	Otsego County Conservation Assoc.	The Applicant should clarify what type of engineering and design practices would need to be utilized to overcome poor soil conditions for stormwater management on the project site
201	2/5/2019	Otsego County Conservation Assoc.	The Applicant should consider analyzing the vehicle miles traveled related to automobile travel generated by the proposed project and associated environmental impacts.
202	2/5/2019	Otsego County Conservation Assoc.	The Applicant should develop and include wetland mitigation, and monitoring strategies in subsequent drafts of the GEIS.
203	2/5/2019	Otsego County Conservation Assoc.	The, Applicant should provide additional detail on how stormwater impacts will be evaluated and mitigated.
204	2/5/2019	Otsego County Conservation Assoc.	The Applicant should clarify whether neighboring municipalities such as the Town of Oneonta were consulted as part of the DGEIS preparation process.
205	2/5/2019	Otsego County Conservation Assoc.	The redevelopment of the Oneonta Rail yards, if facilitated in a manner consistent with the City's planning objectives, is an example of "smart growth" that will lead to job creation and improvement of the local economy. OCCA commends the applicant for considering environmentally friendly development options especially alternative energy development on the project site. OCCA recognizes the generality and breadth of GEIS', however-it is critical that subsequent drafts of the GEIS provide sufficient detail to ensure that specific thresholds for environmental impacts can be established. Doing so will expedite project reviews, lower project costs, and limit the risk of legal challenges. OCCA looks forward to working with Delaware Engineering, the City of Oneonta, and the Applicant toward the eventual completion of the FGEIS.
206	3/14/2019	Katherine O'Donnell, Ph.D.	<p>Hello. My name is Dr. Katherine O'Donnell, former resident and employee in the City of Oneonta, long- term resident of the town of Oneonta, and a member of Concerned Citizens of Oneonta. I thank Mayor Herzig, council members, and staff for your substantial expenditure of time and energy on the many important projects that you have brought to our community.</p> <p>The railyard GEIS discusses using gas for development but does not mention any source. Gas would either come from the expanded DeRuyter pipeline or the proposed Town of Oneonta gas decompressor with CNG trucks or both, yet the impact of that gas infrastructure is not mentioned or assessed in the GEIS review. Why Not? This segmentation of interlinked infrastructures and effects is illegal, therefore, it will be vigorously and legally challenged.</p>
207	3/14/2019	Katherine O'Donnell, Ph.D.	<p>If the city pursues geothermal, solar, and battery storage as mentioned in the GEIS, you will have our strong support for this initiative.</p> <p>Quoting Robert Frost, Two roads diverged in the wood, and I took the one less traveled by, And that has made all the difference.</p>



208	3/14/2019	Katherine O'Donnell, Ph.D.	The development of a renewable energy- powered, net zero carbon, eco commercial park that considers the land, animals, climate, and surrounding community, the first such venture in NYS, would make an enormous difference and put Oneonta on the national map of forward- thinking communities planning for the 21st century. The rail yard project will then be the jewel in the crown of a very successful city development campaign and part of a statewide, national, and global quest to grapple with the many dimensions of climate change.
209	not dated	Emily VanLaeys; Mark VanLaeys; Suzanne Miller; Dr. Lisa Barr; Maria Agliano; Alice Siegfried; Sandra Breuls; Jude Bisbishop; Anne Ray	Petition to the Town Board of Oneonta, the City Common Council of Oneonta, the Otsego County Board of Representatives and Otsego Now/Industrial Development Agency (IDA) We the undersigned, collectively demand our local government officials reject any project proposal of a Decompressor Station (Gas Plant) in Oneonta because: <ul style="list-style-type: none"><li>• It violates the town of Oneonta's Comprehensive Plan and town zoning laws;</li><li>• It would create constant truck traffic, noise, lights, odors and toxic emissions;</li><li>• The project would increase traffic of Compressed Natural Gas (CNG) tractor trailer trucks at dangerous intersections;</li><li>• We want to protect our property values and the high quality of life we currently enjoy;</li><li>• Development should focus on economic development that protects our environment and our way of life;</li><li>• A Decompressor Gas Plant could open the door in Oneonta to building gas-fired power plants, a compressor station, excessive heavy industry, and other sources of pollution incompatible with our community.</li></ul>
210	not dated	Ruth Serafin	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies. <i>Are there any other options being offered at this time? Are prior studies available online? Site?</i>
211	not dated	Lisa Spencer	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
212	not dated	Julie Pollak	I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
213	not dated	Janice Baroni	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.

214	not dated	Carol Mitteager	At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
215	not dated	Edward Spencer	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
216	not dated	Barbara D. Shrader	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
217	not dated	Hali and Peter Tomczak	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
218	not dated	Neil A. Place	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
219	not dated	Tina Wells	At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
220	not dated	Katherine Rorick	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.

221	not dated	Rosemary Markert	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies. <i>IF some version of the gas industry comes to Oneonta, the jobs created MUST lift people into the middle class - not substitute being on the "tit" of the state/govt (social services, etc) &amp; on to the "tit" of a gas corporation, concerned with its own profits.</i>
222	not dated	Kathy Shinberg; Dorothy Hudson; Suzanne Miller; Charles J. Hudson; Susan Wiener; Alice E. Blu; Marcia L. Bowne; Rhiannon Ham; Yolanda Bush	Petition to the Town Board of Oneonta, the City Common Council of Oneonta, the Otsego County Board of Representatives and Otsego Now/Industrial Development Agency (IDA) We the undersigned, collectively demand our local government officials reject any project proposal of a Decompressor Station (Gas Plant) in Oneonta because:  <ul style="list-style-type: none"> <li>• It violates the town of Oneonta's Comprehensive Plan and town zoning laws;</li> <li>• It would create constant truck traffic, noise, lights, odors and toxic emissions;</li> <li>• The project would increase traffic of Compressed Natural Gas (CNG) tractor trailer trucks at dangerous intersections;</li> <li>• We want to protect our property values and the high quality of life we currently enjoy;</li> <li>• Development should focus on economic development that protects our environment and our way of life;</li> <li>• A Decompressor Gas Plant could open the door in Oneonta to building gas-fired power plants, a compressor station, excessive heavy industry, and other sources of pollution incompatible with our community.</li> </ul>
223	not dated	Annemarie Hosnedl; Katherine Paranya; Jennifer Hyypic; Norma Lee Harcns; Craig Schwalenbe; Alice Siegfried; Alice E. Blu	Petition to the Town Board of Oneonta, the City Common Council of Oneonta, the Otsego County Board of Representatives and Otsego Now/Industrial Development Agency (IDA) We the undersigned, collectively demand our local government officials reject any project proposal of a Decompressor Station (Gas Plant) in Oneonta because:  <ul style="list-style-type: none"> <li>• It violates the town of Oneonta's Comprehensive Plan and town zoning laws;</li> <li>• It would create constant truck traffic, noise, lights, odors and toxic emissions;</li> <li>• The project would increase traffic of Compressed Natural Gas (CNG) tractor trailer trucks at dangerous intersections;</li> <li>• We want to protect our property values and the high quality of life we currently enjoy;</li> <li>• Development should focus on economic development that protects our environment and our way of life;</li> <li>• A Decompressor Gas Plant could open the door in Oneonta to building gas-fired power plants, a compressor station, excessive heavy industry, and other sources of pollution incompatible with our community.</li> </ul>
224		Florence B. Loomis	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.

225	Catherine Maxam	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
226	Catherine McAdams	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies. <i>First clean up all the toxins and pollutants that are there.</i>
227	Loretta White	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies. <i>Stirring up pollution and environment sludge spots help no one. Busy roads with trucks are dangerous for small communities. I live and shop near you.</i>
228	Lorane D. Burchill	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
229	Diane Nasl	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies. <i>Build a solar farm on the railroad site.</i>
230	Jean D. Kohler	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.

231	Ruth Carlson	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies. <i>The soil where coal was stored has to be bad for our health.</i>
232	Judith Brill	Greenspace? Bike Paths? <i>YES!!</i> I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
233	Ellen Schmitt	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
234	Lucy Kise	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies. <i>What about all the hazardous waste in the ground. What will be the cost??</i>
235	Ruby Mitchell	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies. <i>Let's build to the future - solar, wind, &amp; geothermal. NO gas - the danger is real. The trucks - the spills - the methane on &amp; On... Oneonta can and must lead to the future.</i>
236	Linda Bevilacqua	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.

237	Kennenth Fogarty	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies. <i>Being lured into supporting gas infrastructure is extremely foolish. Prices are now being supported to remain low for a while. But after locking into new infrastructure, price of gas is likely to soar. Renewable prices are declining. But the economic trap for those committed to gas will prevail.</i>
238	Barbara Loeffler	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
239	Epifanco Bevilacqua	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
240	Thomas Collier	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
241	Molly M. Swain	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.

242		Kathy Shinberg	<p><i>City, Town, surrounding towns &amp; rural areas are all part of &amp; affected by, this development. so we're all concerned. Multi-use, including green space? Walkable-friendly buildings incorporating gardens for local food?</i> I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies. <i>I strongly favor near &amp; long-term sustainable/renewable energy sourcing, distribution, use &amp; further development. I live on Rte. 205 in Mt. Vision &amp; have experienced these huge tractor trailer CNG transport trucks going past my house at the rated of 2 &amp; 3 per hr, 24/7/365 over the past 2 years. Sometimes (frequently) speeding thru the 40 mph one-mile stretch in mid-hamlet. I'm also aware of the various accidents in our area &amp; beyond that have occurred since the compressed natural gas transport began, as well as the additional toxic effects on our already endangered environment, health, climate from the increase in methane &amp; CO2 at most all stages of this industry's increasing buildout. Oneonta is my "urban hub" for shopping, socializing, intellectual life &amp; stimulation &amp; the arts, for 47 years ... (cut off)</i></p>
243	3/18/2018	Athur J. Rorick	<p>I had the chance to read the comment submitted by Ronald E. Bishop, Ph.D., CHO; an Assistant Professor of Chemistry and Biochemistry at SUNY Oneonta. See attached. As previously mentioned in my first comment, I have walked the entire area of the Oneonta Rail Yards including wetlands and acreage; that includes directly behind Walgreens and going west down and behind what was once called the Chinese Wall and south toward the tracks. Much of this area is indeed need of major soil remediation. I submitted some pictures that show some of the soil conditions. Based on Mr. Bishops letter, I think we must make sure these impacts are studied and addressed. Additionally, I would like to see some baseline tests (e.g. soil,) conducted as was mentioned to fully understand the severity and scope of the problem. I don't understand why we have to be afraid of sound development and hide facts that should be studied. We have an obligation to clean up these areas for the next generation. This process has just begun and I hope the city, town, and county boards will see that we must make sure that any economic development has to be made with an all-time commitment to our environment and our resources. Let's study all of the impacts including what sustainable energy and resources can provide.</p>

244	3/18/2018	Athur J. Rorick	<p>First, I want to say that I understand this process can be difficult with trying to bring about sustainable jobs and good economic change. Many people view natural gas as a global issue mostly because of the fracking boom issue and all of the impacts that new gas development can bring today like compressors, decompressors, air quality &amp; various health risks. No doubt, you have heard and seen the impact from the fracking industries to communities across our country. I believe that we need to have strong leadership and vision that puts our people, our residents first before corporations. I think we need our city council, town, and county board to put health, safety, and sustainable solutions on the table.</p> <p>There are many fossil fuel solutions to energy needs. I ask that you consider alternative solutions in any new development. That includes building technologies and energy. Because if buildings are more energy efficient it is proven that less heating &amp; cooling energy are needed. Below is a list of electric power, energy solutions. and resources that I see as a good place to start. Since it may not be an all encompassing list, I hope the review of my comment will help in continuing to improve the GEIS for the Oneonta Rail Yard development.</p> <p><b><u>Electric Energy Solutions</u></b></p> <p>Biomass (Wood, Garbage, Crops, Landfill, Alcohol); can provide both electricity and heat energy  Wind Power  Solar Power  Hydroelectric Power (These systems vary in application from pump storage to traditional)  Tidal Power  Fuel Cell Power  Battery, Capacitive &amp; Others</p>
245	3/18/2018	Athur J. Rorick	<p><b><u>Heating Energy Solutions</u></b></p> <p>Heat Pump (These systems can also be used for cooling solutions)  Types: Air-to-air, Geothermal (ground source or water source), Geothermal (desuperheater with applications such as hydronic systems and domestic hot water)  Solar Heating  Wood/Pellet Stoves/Boilers  Biomass Gasification Boilers</p>
246	3/18/2018	Athur J. Rorick	<p><b><u>Types of Available Resources</u></b></p> <p>Susquehanna River  Sun  Wind  Land/Property/ Acreage  People/Companies/Labor Force  Time</p> <p>I mentioned the Susquehanna River because it's a tremendous energy resource for use as both electric energy potential but also a water source for heating &amp; cooling exchange. Of course, there are issues that would have to be addressed when using any resource or solution and this should be a part of the impacts provided through the GEIS. We don't want to impact our fish habitat or cause issues with air, water, soil, etc. If it is done right there shouldn't be any reason the design of a "eco-friendly" commerce park may just be what this developed area can become while allowing the local economy to grow. Time is a resource I see that is still on our side. The Final GEIS is our only saving grace at this point in time, I hope more effort is done to ensure all relevant environmental impacts, facts, and conclusions are disclosed as per Part 17 of the State Environmental Quality Review.</p>



247	3/5/2019	Athur J. Rorick	As a resident of the 5th Ward, the development of the Oneonta Rail Yard concerns me regarding the proposed maximum buildout of five (5) commercial buildings that amount to over 900,000 square feet and that not one company is mentioned in this development plan. I just don't understand how this project can propose and design all of this development when not one company is looking to open their doors in this area.
248	3/5/2019	Athur J. Rorick	Additionally, several other concerns from the report include:  Existing roads are not wide enough to handle the diversity of traffic today. Many times fire trucks, tractor trailers, large busses, and other larger vehicles/trailers are over the double-yellow lines. This is especially true at Main/Chestnut St, Fonda Ave/Chestnut Stand Oneida/Chestnut St. The three-year crash history in the report shows heavier traffic that occurs today and the project hasn't begun to break ground.
249	3/5/2019	Athur J. Rorick	No water amounts have been indicated and this is a real important concern since water is such an important resource. The report saying: "Appears to have enough" is not a reassuring statement when not one company has come forward.
250	3/5/2019	Athur J. Rorick	Impact to/from area wetlands and the biodiversity that exists today will be at risk should this development move forward; not to mention the areas increase from flooding risk.
251	3/5/2019	Athur J. Rorick	Concerns over the type of soil in this area and the impact to building integrity and having strong foundations; especially since this is next to a major flood zone.
252	3/5/2019	Athur J. Rorick	Air quality concerns that exist today from Lutz Feed, Cobleskill Stone asphalt & concrete plant. Baseline air quality tests should be taken before project moves forward.
253	3/5/2019	Athur J. Rorick	Therefore, I do not approve of the project plans as currently planned for this area.
254	3/5/2019	Athur J. Rorick	As a resident of the 5th Ward, the development of the Oneonta Rail Yard concerns me regarding the proposed natural gas energy usage for over 900,000 square feet of buildings proposed for the max-development. The GEIS indicates a yearly natural gas usage estimate of 40,000 MMBtu (40,000,000,000 Stu's) or 400,000 Therms at the maximum buildout.  Today, our communities are more at risk of losing natural gas supply simply due to the aging gas line (installed 1953) that feeds Oneonta from Norwich/DeRuyter. This project wants to add 40,000 MMBtu/year of natural gas loading for the proposed max-development. I have a real concern over the direction our City and County is taking us when it comes to this development and the whole discussion around energy supply. Instead of proposing this type of energy solution, the City and County should be promoting energy conservation, renewable energy solutions and more efficient energy and building choices that move us away from fossil fuel energy increases to cleaner, renewable, and healthier solutions for our planet. I realize that it is not easy, but it has to start now.  We need to be looking out for our communities health and the health of our planet. 400,000 Therms of natural gas is equivalent to over 2100 metric tons (over 2300 tons) of carbon dioxide (CO2) emissions burnt from natural gas; equivalent to 450 cars driven for one year. However, direct methane emissions thru leaks of natural gas (without burning) are about 25 times more powerful CO2 in terms of the warming effect on our atmosphere and planet.  Therefore, I do not approve the use of additional natural gas upgrades or usage for this project and we should not be building anything unless it can be built using the most advanced building & heating technologies to accommodate development for this area.

255	3/5/2019	Athur J. Rorick	A January 24, 2019 article: "Colorado Court: Oil, Gas Drilling Decisions Can't Hinge on Public Health", was about young activists who want regulators to make oil & gas development contingent on protecting health and curbing climate change. The article said the case had threatened to sharply curtail oil & gas drilling in Colorado and the state Supreme Court ruled on Jan. 14 that state regulators cannot put health and environment above all other considerations when approving new fossil fuel development under the current state law.
256	3/18/2018	Athur J. Rorick	A constitutional climate lawsuit: Juliana v. United States, a group of 21 young people that the Justice Department ruled the young plaintiffs in the case, have "no fundamental constitutional right to a "stable climate system." These and many other lawsuits have been charged against our federal government. Our state government has also been involved with various lawsuits involving natural gas projects. Our states Attorney General also launched a lawsuit last October against ExxonMobil Corp. over the company's treatment of climate change-related risks and costs. While the Trump Administration continues to move forward with "American energy dominance" agenda, Oneonta is wrestling with its own issues surrounding jobs, development, and energy.
257	3/18/2018	Athur J. Rorick	When it comes to the GEIS and development of the Oneonta Rail Yards, the concept of "reasonableness" is discussed in the SEQR handbook. While the ORI funding of \$10 Million in public funds can have positive impacts, as the lead agency, our Common Council has an obligation to review all of the potential impacts for the Oneonta Rail Yard development including those that have been submitted and described in many comments made by our community. If we are going to help our communities and keep them clean & safe, we have to have strong leadership & vision that puts the earth, biodiversity, ecosystems, our resources and our community first before development. Very little discussion has been put forth that exemplifies these ideals. Otherwise, we may be headed to our own state courts.
258	3/18/2018	Athur J. Rorick	Therefore, I feel the existing GEIS fails to describe all of the impacts and the Common Council needs to review all of the impacts submitted and re-submit the GEIS to the public.
259	not dated	Edward Spencer	I grew up on Parish Ave in the 1960's. As a child I was forbidden to play with my friends in the railyards, so of course, that's where we played. I saw, and I know where the repair shops dumped the old lead paint, the sand from sand blasting, the lead paint, the tar and ties. The soot, ashes, grease and grime of over 100 years is the "soil" of the railyards. Disturbing this area without an extensive environmental impact study could cause irreversible damage to the families in the area. Irresponsible development of this area would be dangerous, heartless and frankly stupid.
260	not dated	Linda Spencer	As a parent and grandparent that has extended family in Oneonta I am completely opposed to the GEIS from the Railyard in Oneonta. Being from a railroad family I am well aware of all the toxic chemicals that were used, for many years, in the yards. The ground in that area is a brown field, full of contaminants that will cause Oneonta residents profound health problems. I want my grandchildren to grow up in a healthy community. We need to look to the future and go green. I attach information that further explains why I oppose this (attached comments of Ronald E. Bishop, Ph.D., CHO)
261	3/12/2019	Pamela Stewart	I am writing to say that I and my entire family are opposed to any industrial development in the old railyards that has to depend on natural gas. We worked hard to keep fracking out of our County, town and City. As I understand it the plan does not specify the type of energy to be utilized for the industrial park. If natural gas is in the mind of our elected officials we are mightily opposed. This would need a compressor station or CNG trucks running up & down Chestnut St? It is environmentally speaking a horrible idea for our area. I need not go into the dangers to our air and water, as well all known that. Suffice to say I would like my grandchildren to enjoy the same privileges as I had growing up. IE: Clean air and water. Why can't we be forward thinking

			and design the park to use solar, wind or geothermal? We all know this type of energy is the future. It is not a far off future either. it is here now and why can't our elected officials even study the idea. Again, we are opposed to an industrial park in the rail yard - IF it is dependent on natural gas for its energy source.
262	3/9/2019	Donna W. Vogler, Ph.D.	This letter is to comment on the Generic Environmental Impact Statement (GEIS) dated December 28, 2018. I am a citizen of Oneonta and live on East St. Like many citizens I have concerns about the energy use implications for this development but these are being addressed by others with more expertise. I write specifically about the wetlands on this site and to advocate for Option 4 of the alternatives.
263	3/9/2019	Donna W. Vogler, Ph.D.	<p>My expertise in this area comes from over two decades of wetland experience. I hold a PhD in Botany (Penn State, 1997), teach undergraduate and graduate courses in wetland delineation (Biol 383 and BIOL 683 at SUNY Oneonta), and have worked with Jordan Clements of Otsego County Soil &amp; Water in a wetland delineation. I am currently collaborating with our local USDA Natural Resource Conservation Service with one of my graduate students to evaluate wetland function in 10 wetlands across Otsego County. Several of my former students have entered careers involving wetland delineation. I know and have used both federal and state regulations regarding wetlands, and was previously an employee of the US Fish &amp; Wildlife Service.</p> <p>My concern for the development plans offered, particularly Options 1a, 1b, 2 and Option 3 (the "preferred" plan) is that all these options show several buildings and roads squarely in the wetland, and particularly on the soil type designated as Carlisle Muck and other wetland "hydric" soils. This is what the US Department of Agriculture says about the Carlisle (Ce) soil type:</p> <div data-bbox="548 961 1349 1045" style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>This soil is poorly suited for community development. The high water table and the low strength of the surface layer are the main limitations. The use of onsite septic systems is not feasible in this soil. When the soil is drained, the surface layer shrinks and subsides.</p> </div> <p>(source: <a href="https://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/survey/office/ssr12/?cid=nrcs144p2_016629">https://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/survey/office/ssr12/?cid=nrcs144p2_016629</a>)</p> <p>Muck soils are spongy and porous, where water can and often does, travel horizontally. The high organic content retains water, and like a sponge will shrink if dried. The delineation report in the Appendix to the GEIS supports this by stating that these soils have reduced soil chemistry, which means that saturation of this soil at this site is a perennial condition. Options 1-3 involve buildings over a Class 3 stream (or more likely, re-routing it). To place buildings on such ground is beyond foolhardy and would require extensive civil engineering to make it stable for commercial development. Undoubtedly there are construction engineers willing to alter the landscape to this extreme degree to enable it to support a building that would survive flooding or subsidence ... in most years. The GEIS listed mitigation is an option for the wetland loss, but I will argue that mitigation is an option best not pursued. I hope our state and federal agencies that would review such a permit request would have the good sense to soundly deny it. Options 1-3 would effectively reduce a wetland that is currently functioning to do what wetlands do best, and currently servicing the City's interests in water quality and flood management.</p> <p>The Delineation Report is commendable for its detail, but it underplays the value this wetland has for the region. It alludes to the fact that the wetland is likely "jurisdictional" meaning that both state and federal permits will be required, but this is a certainty. Below I have inserted a screen capture from the NYS DEC's Wetland Mapper, showing that it does contain a wetland on the federal National Wetland Inventory (NWI). This wetland drains into the Susquehanna River and thus must be reviewed under Section 404 of the Clean Water Act. I ask you to consider: Why is this neglected wetland listed under both state and federal regulations? What value is any wetland, or this particular wetland to Oneonta? I'll tell you.</p>



Screen shot from the DEC Wetland Mapper. In dark green outline are wetlands recognized by the federal government under the National Wetland Inventory. The lime green areas are mapped under NYS freshwater Wetlands, and the lighter color is the 100 ft buffer zone. In blue is a Class C stream. Any movement of soil that could alter the wetland hydrology requires a permit.

Wetlands have been described as the "kidneys" of an ecosystem. They filter water, purify it by reducing coliform bacteria, nutrients, sediment and in some cases organic pollutants. In fact, many wetlands have been credited to reducing organic contaminants such as tar and coal ash as might have been left at this site from the railroad days. Obligate wetland plants (OBL in the delineation report) have an aerobic layer surrounding their roots and this provides microbes a surface to break down complex, and sometimes toxic, molecules. As a tributary to the Susquehanna, the Roundhouse wetland provides floodwater and storm water retention. Remember the 2006 flood? How about the 2010 flood? I note that our own wastewater treatment plant is just downstream of the point where this tributary enters the main channel. I strongly recommend keeping as much as the wetland area as still exists in the City area as possible, to continue these vital functions.

The GEIS mentions mitigation and stormwater management several times as a solution to the wetland loss, and concurrent gain of impervious surfaces. This is a very poor solution in our particular case. A "typical" mitigation plan is a 1-for-1 replacement, either on-site or off-site as the report mentions. Yes, there are other wetlands along this tributary- that are in private hands. Also, even if the permit-granting agencies approved 1-for-1 mitigation, it would still mean that there would be loss of a functioning wetland with deep muck soils and a permanent stream in this area, for another place to gain or expand one. The Railyard wetland provides services to the Railyard area- and upstream and downstream. A mitigation site some distance away will not provide floodwater retention nor pollution reduction here, not to mention the provision of biodiversity and habitat.

If there is to be development, Option 4, would do the least harm to wetlands while still providing space for commercial development. I am in fact supportive of the industrial development of the roundhouse area, and agree that job creation is an admirable goal for the City. This Railyard area is underused, and contains some suitable areas for development. I emphasize "some" ... not all. Keep the wetlands.

264	3/9/2019	Donna W. Vogler, Ph.D.	In summary, Options 1,2, and 3 would destroy wetlands, alter hydrology, and require significant civil engineering, _and permits - permits that I would hope would be denied. Option 4 is a great improvement from a wetlands standpoint. Even if some wetland surface Joss is permitted, it would be preferable to alter the lower section of Wetland G than to damage the more valuable and contiguous Wetlands L, D and C in any way. I further suggest that should development take place in the Railyard area, that the remaining wetlands be highlighted as a valued feature, perhaps with signage. Trails and boardwalks do not interrupt flow and can bring additional recreational value to this neglected area. With minor improvements these wetlands could
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			support greater native species and bird habitat and provide more local biodiversity of interest. It would be a great place to extend bike trails or paths of the Oneonta Susquehanna Greenway. Best of all, keeping these wetlands intact provides water quality services to the City, to the County, and to the entire Susquehanna River downstream. Please do not compound the wetland losses of the past at the Railyard site by further reducing the remnant of the original wetland that remains.
265	not dated	unknown	<b><i>Railroad Yard Project and Peripherals</i></b> <b><i>Convergence:</i></b> With prices in the mid 30K range, electric cars are now price competitive with ICE cars when factoring in the cost of ICE maintenance. These vehicles have a vital role to play in converging storage of electricity when wind and solar energy are used. During the course of this railroad yard project there will be a significant changeover from ICE vehicles to Electric. NYS announced recently that it will install 200 fast charge stations across the state. Will there be one or more in Oneonta, Otsego County?
266	not dated	unknown	Will the city include charge stations prior to purchasing its future fleet of electric vehicles? If so, when will that be?
267	not dated	unknown	Is rooftop solar and electric vehicle recharging part of the downtown revitalization project? A lot has transpired in the years since approval of funds. It might behoove a re-evaluation.
268	not dated	unknown	<b><i>Railroad Yard Ideas:</i></b> <b><i>I would advocate for commercial size solar installation:</i></b> An average size commercial solar panel install includes 2000 panels yielding 500KW. The cover sheet and page 12 of the Redevelopment Master Plan shows four projected structures having 900,000 square feet running almost perfectly East-West. Assuming these figures are for single story structures, it would allow for roughly 22-24 average sized commercial installs yielding 10-12MW. Solar panels will be 29% efficient within two to three years. Roof mounted panels have no siting costs and should track the sun. Also to be considered is geothermal and super insulated construction. Look at working with farmers in the Otsego and Delaware County who may have sites that are feasible for wind energy. Tap this source, which in turn benefits our farmers. Using solar and wind, along with converged storage in electric vehicle batteries and perhaps molten salt batteries appears to be the future. For those unfamiliar with using electric vehicles batteries for convergence this is how it works: Fully charged cars are left connected to the grid when not in use, and software tells the battery how much to net-meter.
269	not dated	unknown	<b><i>Rapidly Changing Tech</i></b>  There is promising news for gas proponents. There are experimentally successful solar panels geared toward creating hydrogen gas. They are now past prototyping and a set is installed for full year testing. Designed over a ten year time period, 20 of these panels would yield enough hydrogen gas for a single well insulated home's heating, cooling and electrical needs. This technology may be too new to incorporate unless there is a projection for it to be available at the time of the rail yard project. Having economically produced and stored hydrogen gas opens more doors for industrial use, which is one dream for the railyard. So down the road there may be other spin offs of solar that we do not yet envision. But it would be nice to be on track to take advantage when they arrive.
270	not dated	unknown	<b>Worldwide</b>  500 thousand panels are being installed per day 2 windmills are being installed per hour in China 2015 – Investments in renewables were 2X that of fossil fuels With Wind and Solar Renewables cost competitive with gas now it makes no sense to continue

compromising our environment with new fossil fuel projects.

**Definitions:**

Levelized Cost of Electricity (LCOE) - Metric used to compare the cost of electricity from different sources of generation. Wind and Solar are cost competitive with fossil fuels.

Learning Curve - An economic concept referring to the decline in manufacturing costs of a product as the production volume increases. Usually measured as the percentage decline in cost for every doubling in total volume produced.

Applied to Solar - Learning Curve applied to Solar – Swanson’s Law – double production will drop cost per panel by 20 percent.

Swanson's Law - The cost of producing solar PV panels declines about 20 percent for each doubling in production. It is the learning curve for solar PV panel production.

Moore's Law - When applied to renewable energy, it is a learning curve that specifically measures the percentage change in LCOE each time the total installed capacity is doubled.

With respect to Wind - As total capacity of wind doubles, the average LCOE of wind declined by 34 percent. So every time wind installs double, price comes down by 34%.

Convergence - the idea that renewable energy and electric cars have a mutual task to perform during upswing in Wind and Solar. That being electric vehicles have storage capability.

That storage energy can be uploaded to the grid when not in need by the car driver via smart software and having the car connected to the grid when not driving it.

Intermittency - Energy not commonly available for use as electricity. Wind and solar are intermittent

due to the need for wind or sun. To resolve the intermittency issue, look to electric vehicles.

These vehicles have storage that is not always needed. While vehicles are parked and connected to smart charging networks, software can link the vehicles batteries to the grid.

Allowing vehicles to serve as part of the grid while stationary.

Virtuous Cycle - As sales increase, production volume rises, manufactures learn, and costs decrease.

Wind Turbine Farm - Traditional farms are ideal locations. 50-100 acre size ideal. Can continue farming. 7-10K income per turbine.

**Sources**

Graph page 155 No Time To Lose 450ppm CO2 in atmosphere is trigger.

Reference: Renewable Energy 2019, Bruce Usher; The Earth Institute, Columbia University  
IDA Redevelopment Master Plan


<https://cleantechnica.com/2019/03/03/belgian-scientists-announce-new-solar-panel-that-makeshydrogen/>

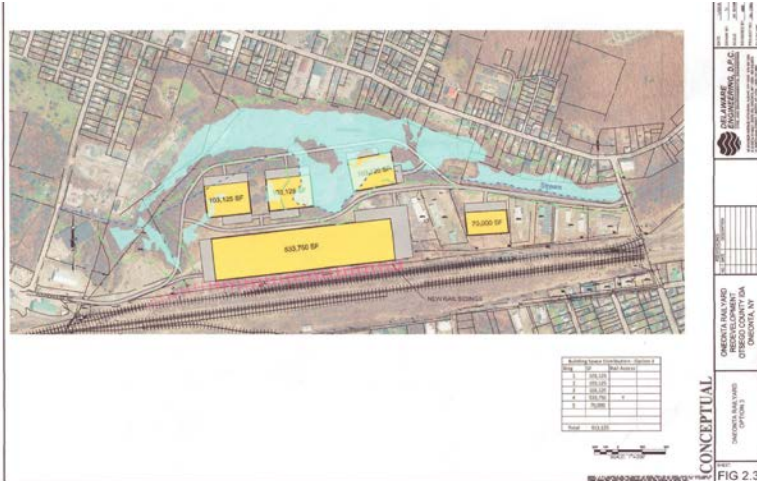
<https://ngtnews.com/new-york-state-launches-initiatives-to-spur-ev-adoption>

271	not dated	Paul Agoglia	<p>What Government can do/oversee</p> <p>When is the projected 'Opening Day' for move in and use of the building spaces in the Rail Yard? Two, three, four years from now? The further out that day is, the more likely solar, wind and perhaps, hydrogen gas will be the lower cost energy types to include. After all, solar and wind are already competitive with natural and fracked gas. Plus we are on the cusp of solar panels creating hydrogen gas. They are beyond prototyping. I request a study be done using economic principles to determine if in fact renewables with convergence are the appropriate and the fiscally sound solution instead of natural and fracked gas. These economic principles are outlined well in Bruce Usher's book 'Renewable Energy' 2019, available at the Huntington Memorial Library. The principles include</p> <ul style="list-style-type: none"> <li>a. Levelized Cost of electricity</li> <li>b. Convergence</li> <li>c. Moore's Law</li> <li>d. Swanson's Law</li> <li>e. Learning Curve</li> <li>f. Virtuous Cycle</li> <li>g. Intermittency</li> </ul>
272	not dated	Paul Agoglia	<p>Now if these terms are new to the Common Council, the Oneonta Town Board, the Otsego County Board, the IDA or the Otsego County Chamber of Commerce, I suggest members read Bruce Usher's book. I had never heard of these terms until I read his book entitled Renewable Energy. It is an eyeopener. Please do not let the city get caught up in a possible death spiral of natural gas. As wind and solar take over, the price of natural gas will go up according to Usher. With this in mind, I suggest looking at the option of starting construction, leaving the door open an energy decision to be made later. At the right time, perhaps several years from now reevaluate the situation and make a decision. In either case, if geothermal is going in, that does need to be done upfront. Super insulated construction can be utilized, leaving necessary preparations in place for wind from local hilltop farms, solar, convergence storage, and/or gas. Only commit to an energy source when it absolutely must be chosen.</p>
273	not dated	Paul Agoglia	<p>Parking Garage Recharge:</p> <p>When the parking garage is renovated, place net metered solar panels on the Foothills roof and feed dozens, if not more, of recharge/net metering stalls in the parking garage. A roof added to the parking garage may be too shaded by Main St. buildings to be a good solar location, but it can be looked into. Also plan for recharge stations in Dietz St Parking Lot. Perhaps instead of awarding more signage grants, the remaining money can be used to forward the idea of charging stations? Remember, wherever there is charging, in theory there is net metering and convergence.</p>


274	not dated	Will May	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies. <i>In Washington, politicians like Mitch McConnell and Diane Feinstein say the Green New Deal and it's provisions like renewable energy are "impractical". Scientists say we have 11 years to turn this around, or there is no turning back. In the meantime, we should be a model city in how the Green New Deal would work, and invest in renewable rather than the fossil fuels destroying the planet. The state of NY bans natural gas fracking because of how damaging it is to the environment. We should not be bringing in gas derived from these dangerous practices from elsewhere, as we know they are dangerous and destroy the environment. Also, as a biker, I would like to see a long bike path in town, that could possibly be expanded in the future. With the rail yard, we should get Amtrak to come in so we can travel without cars. This is part of investment on transportation.</i>
275	not dated	Sharon F. Conrow	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
276	not dated	Thomas Ryder	I favor renewable energy for the railyard project. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
277	not dated	Kimberly Carey-Genzardi	I favor renewable energy for the railyard project. I do not want a gas decompressor plant designed to deliver gas to the railyard site as my new neighbor in the Town of Oneonta. The large trucks carrying compressed gas to a town gas decompressor plant or the railyard site are dangerous. I do not want heavy industry and its accompanying gas infrastructure build out at the railyard - an area surrounded by residential neighborhoods. At the railyard site, I favor ecologically sensitive development that respects the wetlands, birds, animals, and surrounding community and that uses renewable energies.
278	3/7/2019	Albert Colone	The 270 acres of the former D&H Rail-yard is the most important real estate within the boundaries of the City of Oneonta. I've often said the land in question and it's relationship to the City is analogous to the core of an apple; and since the 1960's a gradually rotting core. I believe that unless and until something meaningful happens there the rot will persist, having a dire impact on the rest of the fruit; Oneonta, it's City center, it's neighborhoods and its allied assets. What happens there will determine the future of our community and the surrounding area; will development there bring growth and much needed prosperity or will Oneonta continue to flounder, sadly without fulfillment of it's incredible potential? Please accept this email letter as a formal comment in support of your ongoing processing of the Generic Environmental Impact Statement [GEIS]. I urge the Council to approve the GEIS review of the IDA's 90 acres of the yards, as prepared by Delaware Engineering, understanding that this action is a very preliminary and necessary first step in any future development. I believe it's very premature to try and confirm or finalize a development site plan and/or an energy program, knowing those important determinations are really in the hands of others; committed private developers and State agencies. It's outside financial resources which will answer those issues. Nothing will happen in a major capital way on the 90 acres for several years, unless you have a major private investor in your back pocket, or anticipating a \$40 million grant from New York State or some combination.



279	3/7/2019	Albert Colone	<p>For the what it's worth department, here's my advice on an incremental strategy going forward:</p> <ul style="list-style-type: none"> <li>* Immediately approve the GEIS!</li> <li>* Have the IDA apply for \$651,450 to clear and seed the 50 non wetlands acres of the IDA's 90 acres, improve the existing Round House Road with cul-de-sacs at each site entrance, name and install "project" signage in appropriate high visibility locations. There are some very creative rail themed names which could be considered!</li> <li>* Immediately put a recruiter on the road to evaluate potential capital prospects, to define and refine development concepts and to sign prospect commitments towards future capital construction and operations at the former rail-yard site. For the record; I continue to believe food, beverage and innovation have the greatest economic growth potential for both the rail-yard and DRI zone.</li> <li>* Other action towards addressing future private site development.</li> </ul>
280	3/5/2019	Greta Zarro Co-Founder, Unadilla Community Farm Co-Founder, Leatherstocking Young Farmers Coalition	<p>I'm writing to express my opposition to any form of redevelopment project that involves fracking or oil &amp; gas infrastructure, such as compressor stations, pipelines, power plants, and trains/trucks carrying gas or oil. Please use this development opportunity to incentivize renewable energy, like solar or wind, or providing more green spaces &amp; recreational areas for our community. As an organic farmer, air, water, and soil quality are all very important to me and my business. Fracking and its related infrastructure are known to contaminate water, threaten our environment, and contribute to climate change. My organic farm business depends on having access to clean water, uncontaminated soil, and clean air; if these are jeopardized, so is the quality of my produce and my entire business. Hundreds of thousands of New Yorkers stood up and called for a ban on fracking in 2014. This ban is not complete until we end the buildout of fracking infrastructure in New York State. The buildout of fracking infrastructure here supports more fracking elsewhere, in Pennsylvania and beyond. Further, the buildout of fracking infrastructure is a multi-million dollar, multi-year investment; this is not the kind of investment we should be making in 2019, when the threat of climate change looms ever larger. We need to rapidly transition to renewable energy, and incentivize investments in solar and wind, not lock us into decades more of burning fossil fuels.</p> 



281	3/8/2019	Nancy M. Baker, Regional Permit Administrator	<p>Staff have reviewed the DEIS and Appendices prepared by Delaware Engineering for the Oneonta Railyard Redevelopment project.</p> <p><u>Environmental Justice</u></p> <p>The site is partially located in an Environmental Justice area. Any proposed development for this site would be required to adhere to the Department's Policy CP-29 regarding Environmental Justice outreach, including the preparation of a public participation plan, and public outreach and education.</p>
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282	3/8/2019	Nancy M. Baker, Regional Permit Administrator	<p><u>Wetlands</u></p> <p>As noted in earlier correspondence, the site contains significant State and Federal wetlands. The full build-out depicted in Figure 2.3 anticipates a minimum of 5 acres of State wetlands lost and up to 8:1 acres including the regulated adjacent area. An application under Article 24 (Freshwater Wetlands) for this scope of development would need a strong justification as to why impacts to the wetland and adjacent area cannot be avoided. Additionally, impacts of that magnitude would also require on-site mitigation, which would be difficult to accomplish, given the limited remaining space on the project site.</p>
283	3/23/2019	Robert Stanton	<p>On March 5th at the Common Council meeting, the plan for the D&amp;H railyard development was discussed. The railyard, would be half solar farm and half industrial park. A majority of people in the audience were opposed to the project. Their concerns were mainly about: increased carbon emissions, pipeline leakage, and gas delivery truck safety. People also had concerns about more traffic, increased air pollution and toxic waste in the ground. There is an alternative! I'm proposing that we make the whole railyard a solar farm. The railyard could be made into a eighty-eight acre solar farm that would accommodate 80,000 solar panels and generate 24,000 MWh of energy each year! Based on the NYSEG rate of \$0.14/kWh, the site would produce \$3,360,000 worth of power. I understand IDA owns the land and it is up to them to decide what to do with it. Nevertheless, a large solar farm would be a great first step toward Oneonta becoming a net-zero city for electric power.</p> 
284	3/18/2019	Julie Huntsman, DVM	<p>I am a citizen and tax payer in Otsego County and have several concerns with this document, and also the plans afoot for a massive buildout of gas infrastructure that is clearly linked to this project. First and foremost, I am greatly concerned that the document does not include or detail the Otsego County IDA's associated plans to build a \$17.5 million decompressor station for compressed natural gas (CNG), the accompanying impacts and truck traffic from delivering CNG, and the expansion of the DeRuyter pipeline and additional pipeline construction. These expensive (to say the least) and polluting plans for more gas infrastructure are part of this project and are not addressed in this draft GEIS. Nor are recently divulged plans to construct a power plant! If these highly significant energy infrastructure plans are not even addressed, how can their impacts be acknowledged and plans for mitigation proposed?</p>
285	3/18/2019	Julie Huntsman, DVM	<p>The document needs to be truthful and factual. In these huge and significant omissions, it clearly is not. It is also unclear as to how much acreage is being considered for development. Is it 50 acres? 200? Something in between? This area contains a wetland (and wetlands have vital filtration functions for our groundwater) and should be protected.</p>

286	3/18/2019	Julie Huntsman, DVM	The least disruptive alternative should be chosen, if any development moves forward. In this document that would be alternative 4.
287	3/18/2019	Julie Huntsman, DVM	The Railyard is also a brownfield with significant chemical contamination. How will this be handled without releasing many pollutants downstream, as well as fine particulate matter into the air? Fine particulate matter is an EPA criterion pollutant, and a major source of lung disease. I am sure young families in Oneonta do not want their children exposed to excessive dust and chemicals from poorly planned development. I have a grandchild living not far from the Railyard site. I am thinking about his health and well-being, as well as that of all of Oneonta residents. And concerning the future of Oneonta and this region generally, and its attractiveness (or lack thereof) to young people - more fossil fuel infrastructure is NOT the answer!
288	3/18/2019	Julie Huntsman, DVM	The energy sources chosen to power any development should be renewables to the greatest degree possible. To ignore our contribution to climate change is shameful. We must plan for the least amount of greenhouse gas emissions - not go with more of the same using natural gas. Climate change is a critical issue for young people - for all of us. Oneonta needs to be forward thinking and do the right thing, now. Please go back to the drawing board on this flawed document.
289	not dated	William Huston, Director Terra Vigilante / "Earth Watch"	<b>Introduction:</b>  My name is <b>William Huston</b> , and I am director of <b>Terra Vigilante / "Earth Watch"</b> . I bring over 40 years of technical and engineering experience. For about the last decade, I have been specializing in researching topics related to the safety of natural gas pipelines, compressors, storage facilities, and related to gas drilling and extraction.  <b>Terra Vigilante / "Earth Watch"</b> is one of the few organizations which is focused on researching and reporting on the safety of Bulk-Haul CNG in carbon-fiber composite pressure vessels. My comments today will have a singular focus: the proposal to use new, experimental vehicles to deliver Compressed Natural Gas (CNG) to the Oneonta Rail Yards site to supply utility gas to customers via the NYSEG or other Local Distribution System (LDS).
290	not dated	William Huston, Director Terra Vigilante / "Earth Watch"	In addition to the risks these bulk-haul vehicles have, outlined below, I believe the Otsego County Common Council should abandon any plans to expand dirty fossil fuel infrastructure. This is due to the extreme threat of mass extinction posed by global warming, as well as the upstream environmental costs incurred in places like Northeast Pennsylvania, where there are hundreds of known cases of water contamination caused by gas drilling activities, as well as other extreme impacts to their rural communities there.
291	not dated	William Huston, Director Terra Vigilante / "Earth Watch"	<b>Bulk-Haul CNG</b>  Bulk-Haul CNG is a relatively new thing, made possible by a technological innovation called <b>Highpressure, Bulk-haul, Type-4 CNG Carbon-Fiber Composite "Virtual Pipeline" Tube Trailers</b> . The weight reduction seen by replacing steel tanks with carbon-fiber composites allowed the industry to transport approximately 4x the amount of gas over steel tanks.  The first such trailer to be issued a Special Permit by the US DOT was the Titan-4, manufactured by Hexagon Composites, in early 2012. These trailers were not commercially available until about a year later, when NG Advantage and Xpress Natural Gas (ENG) both started using these vehicles.  <b>A more compact term</b> Since <b>High-pressure, Bulk-haul, Type-4 CNG Carbon-Fiber Composite "Virtual Pipeline" Tube Trailers</b> is so cumbersome, I will henceforth refer to these experimental vehicles as <b>#BombTrucks</b> . This is a much more compact term, and it is scientifically accurate and justifiable.

			<p><b>Summary of Concerns:</b></p> <p>1. High-pressure CNG #BombTrucks are new</p> <p>As stated above, these vehicles are relatively new. In contrast to, erg., steel propane tankers, which have been used for 60-70 years, "Virtual Pipeline" Tube-Trailers were only permitted in the US in 2012, however did not appear on US roads to any degree until 2013, just 6 years ago. First responders have received special training in dealing with propane tanker fires for decades. However, the protocol in dealing with Type-4 CNG is quite different.</p> <p>First responders are largely untrained in how to deal with these vehicles, and often make mistakes, such as lighting flares, or cooling the tanks with water lines, which put themselves and others in harms way.</p>
292	not dated	William Huston, Director Terra Vigilante / "Earth Watch"	<p>2. #BombTrucks are unregulated</p> <p>All regulators derive their specific authority from the statutes. But if the statutes are silent on some technological innovation XYLEM (erg., Fracking, GMOs, #BombTrucks, etc), then the regulators have no authority. Our team has been in touch with every regulatory agency, US DOT, NYSDOT, FERC, NYS PSC, NYSP, etc., and no agency wants to touch these vehicles.</p>
293	not dated	William Huston, Director Terra Vigilante / "Earth Watch"	<p>3. #BombTrucks pose extreme hazards to communities the travel through</p> <p>a) Rollover Risk</p> <p>As I have documented in my Trailer Incident Page3, there have been 6 rollover accidents in NY and PA over the last two years. Both operators (XNG, NG Advantage) have had rollover MVAs. This is because these trailers, especially the Quantums, have a high center of gravity compared to typical trailers. This makes them prone to rollovers. Additionally, the Quantums tend to be mounted on an air-ride chassis, which makes for a very unstable load.</p>
294	not dated	William Huston, Director Terra Vigilante / "Earth Watch"	<p>b) Risk of Fire</p> <p>These trailers hold between 350,000 scf – 500,000 scf of compressed natural gas. These trailers can vent their lading in a variety of circumstances. If the tanks get too hot, the thermally activated Pressure Relief Device (PRD) will open. Sometimes the trailers vent spontaneously. Sometimes they burst during filling. Sometimes the tanks leak in an accident. In any of these cases, should the gas stream find a source of ignition, it will turn into a giant flamethrower. This happened on 7/2/2015 in Chesapeake Va, when a CNG powered trash truck with a chassis fire, caused the PRDs to vent. Because of the design of the truck, the tanks vented to the side. Flames shot 50ft and destroyed a house.</p>
295	not dated	William Huston, Director Terra Vigilante / "Earth Watch"	<p>c) Risk of Explosion without fire</p> <p>There have been several instances where type-4 CNG tanks have exploded with no source of ignition. In all such cases, there was destruction of the truck, and severe injuries or death.</p> <ul style="list-style-type: none"> <li>▪ 4/3/2014: Howard WI, unsecured load pierced tank (truck destroyed, fatality)</li> <li>▪ 5/31/2016: Nashville TN, damaged tank explodes while filling (truck destroyed, driver thrown 30ft)</li> <li>▪ 12/21/2018: Buttonwillow CA, tank explodes while filling (truck destroyed, driver suffers severe injuries)</li> </ul>



296	not dated	William Huston, Director Terra Vigilante / "Earth Watch"	d) Risk of Explosion with fire  There have been other cases where the tanks exploded in the presence of a fire. <ul style="list-style-type: none"> <li>▪ 1/27/2015 Indianapolis, IN, CNG trash truck load fire, PRDs fail to operate. Truck is destroyed. Heavy shrapnel lands 1,200'ft away.</li> <li>▪ 6/23/2015 Buffalo, NY, CNG tractor is hit by a train. Truck is destroyed. Two people suffer severe injuries.</li> <li>▪ 1/11/2017 Dodge City MN: On a frigid day, a CNG refuse truck with a full fill is taken indoors to a paint bake-room. Truck is destroyed. Several people inside suffer severe burns.</li> </ul>
297	not dated	William Huston, Director Terra Vigilante / "Earth Watch"	e) Delayed Ignition (Worst Case)  We have thus far, not seen a worst-case scenario, "delayed ignition". This would be an explosion of staggering proportion, like 11 MOABs, the most powerful non-nuclear weapon in the US Arsenal.
298	not dated	William Huston, Director Terra Vigilante / "Earth Watch"	4. #BombTrucks pose special risks when connected to natural gas Local Distribution Systems (LDS)  The specific application of using 3600 psi Tube-Trailers to supply Local Distribution Systems is still very new. The earliest I can find were both in 2014 (Middlebury, VT; and Concord, NH). Henceforth there have been several others, and more proposed. Natural gas Local Distribution Systems are typically fed by a lateral from a natural gas transmission line, operating at 800-1200 psi. These Tube-Trailers operate at 3x this pressure. So the risk of injecting high-pressure gas directly into a system designed to operate at 0.5 psi into homes and businesses could cause an extreme overpressurization event, similar to Merrimack Valley 9/13/2018. Additionally, there is a new risk inherent with these extreme pressures. The Joule-Thomson Effect, which derives from the Ideal Gas Law, states that when dropping the pressure from, e.g., 3600 psi to 75 psi (typical for a distribution main), would yield a 250°F temperature drop. So it is possible that pressure-regulated, but cryogenically cold gas could be injected onto the LDS. This is especially bad, since this super-cold gas at the correct pressure could get past additional step-down pressure regulators. As the gas warms, it would tend to expand, in this case, by ~50x. This kind of risk is very new, and derives from the extreme pressures involved.
299	not dated	William Huston, Director Terra Vigilante / "Earth Watch"	5. Both major operators (Xpress Natural Gas, NG Advantage) have made false statements about the safety of these vehicles to regulators, elected officials, the press, and the public. Matt Smith of Xpress Natural Gas, and Jay Parent of NG Advantage have made multiple false statements to regulators, elected officials, the press and the public about the safety of these vehicles. Both have said, "these tanks cannot explode". This is demonstrably false.
300	not dated	William Huston, Director Terra Vigilante / "Earth Watch"	6. One operator, Xpress Natural Gas, has an abysmal record of safety, and regulatory compliance.
301	not dated	William Huston, Director Terra Vigilante / "Earth Watch"	7. The preferred trailer type used by both major operators, the Quantum VP-Lite51 has leaked during rollover accidents at least four times, which is a violation of the US-DOT Special Permit.

302	not dated	William Huston, Director Terra Vigilante / "Earth Watch"	<p>Recommendations:</p> <ol style="list-style-type: none"> <li>1. Due to the unique risks of these vehicles, any use of bulk-haul, high-pressure CNG Tube-Trailers at this site must be scoped under an independent SEQRA review, which examines the full end-to-end impacts. Trucks must be restricted to specifically defined Primary Routes, or a single Secondary Route to be used only in the event of a closure of the Primary Route.</li> <li>2. A Quantitative Risk Assessment should be performed on the specific application of using 3600+ psi Tube-Trailers as pressure boosters for LDS, or as a non-pipe alternative supply. Specific attention should be made to the question of whether high-pressure gas, OR-- pressure regulated, but cryogenically cold gas, could be inadvertently injected into the system, due to human error, mechanical failure, or design defect. Either of these situations could cause a large-scale overpressurization event similar to the 9/13/2018 Merrimack Valley incident, with the potential for massive property damage, personal injury, or death. Specific mitigation measures should be suggested, and approved by a team of Professional Engineers.</li> <li>3. Before any operator is approved as a supplier for CNG-by-truck, special scrutiny should be made to their prior safety record, and record of regulatory compliance.</li> <li>4. Even better: Get off the fracked gas now. Break the cycle of addiction. Let us use this as an opportunity to make the City of Oneonta, and Otsego County a leader in clean, renewable energy.</li> </ol>
303	not dated	Jan Mulroy	It is an ambitious project and rightly or wrongly people have high expectations for generated income for the area. Mayor Herzig calls the project a unicorn because it has access to both rail and interstate, making it useful for intermodal transportation. Unfortunately, the acres of Federal and State regulated wetlands and unremediated brownfields on and around this project site have not been properly reviewed by developers or Delaware Engineering. Possibly rail and interstate access won't be enough to save this proposal.
304	not dated	Jan Mulroy	The GEIS shows sidings and a bridge in the Master Plan options, but content of the GEIS does not reflect the building of either. Yes, it is a generic statement, but this project would not have been conceptualized if it were not for the rail access. Clearly, the GEIS is incomplete. For example, input from the Department of Transportation and the Surface Transportation Board might help realistically inform impacts of sidings and bridge to this site.
305	not dated	Jan Mulroy	As stated in the GEIS, D&H Railyards went into decline as train engines began to be powered by diesel rather than steam. Railroad employment declined further as the hauling of coal and oil decreased in the 2000's.
306	not dated	Jan Mulroy	In 2015, Norfolk & Southern announced their acquisition of a Canadian Pacific line that runs through an area of the Marcellus Shale, and became a hauler of fracking sands to that area.
307	not dated	Jan Mulroy	While developers imagine product being exported from Oneonta by rail, the GEIS fails to consider the possibility of receiving imports by rail to Oneonta. Norfolk & Southern won't likely come to Oneonta with empty cars.
308	not dated	Jan Mulroy	Norfolk & Southern explains on their website, trains can carry the freight equivalent of several hundred trucks, while stating that they offer waste transportation solutions. In 2017, Norfolk Southern moved more than 3.2 million tons of municipal solid waste, including trash, demolition debris, and industrial waste to disposal sites. Given Norfolk & Southern's relationship with fracked gas producers, I would expect that industrial waste includes drill waste from fracking operations. Trucks would then move that waste to a final destination in Otsego Co.

309	not dated	Jan Mulroy	<p>Fracking waste includes:</p> <p><u>Flowback fluid</u> (Wastewater that that returns to the surface soon after a well is fracked-- mostly of water, injection fluids, and chemicals.)</p> <p><u>Production brine</u> (or produced water)</p> <p><u>Solid waste</u> (for example, drill cuttings, drilling muds, and sand,</p> <p>Isn't it conceivable that Norfolk &amp; Southern can deliver "several hundred trucks" worth of fracking waste to the rail yards to then be trucked around the county for disposal? The impact of imports in general and fracking waste in particular has not been discussed in the GEIS. I know I do not want fracking waste in or around my community. Will you commit to not accepting fracking waste at the Oneonta Railyards?</p> <p>Types of Fracking Waste:</p> <p>Flowback fluid (or flowback water)</p> <ul style="list-style-type: none"> <li>o Wastewater that that returns to the surface soon after a well is tracked, consisting mostly of water, injection fluids, and chemicals.</li> </ul> <p>Production brine (or produced water)</p> <ul style="list-style-type: none"> <li>o Wastewater that flows to the surface during oil and gas well production.</li> </ul> <p>Solid waste (for example, drill cuttings, drilling muds, and sand)</p> <ul style="list-style-type: none"> <li>o Soil, rock, and other solid materials that are removed when a well is drilled, and sand that returns to the surface after a well is tracked.</li> </ul> <p>Common Contaminants in Fracking Waste:</p> <p>Chemical additives, such as ethylene glycol, naphthalene, and sulfuric acid</p> <ul style="list-style-type: none"> <li>o Toxic to human health.</li> </ul> <p>Metals and organic compounds</p> <ul style="list-style-type: none"> <li>o For example, barium is linked to gastrointestinal disturbances, muscle weakness, and paralysis.</li> </ul> <p>BTEX - benzene, toluene, ethylbenzene, xylene</p> <ul style="list-style-type: none"> <li>o For example, benzene is a carcinogen, and linked to blood disorders such as anemia.</li> <li>o For example, toluene is linked to nervous system, kidney, and liver problems.</li> </ul> <p>Salts or total dissolved solids</p> <ul style="list-style-type: none"> <li>o Corrodes infrastructure, harms aquatic life and vegetation.</li> </ul> <p>NORM - naturally occurring radioactive materials, such as radium-226 and radium-228</p> <ul style="list-style-type: none"> <li>o Carcinogen, linked to blood disorders.</li> </ul>
310	not dated	Katherine O'Donnell, Ph.D.	<p>Legerdemain -The Skillful hiding of the truth in order to trick people</p> <p>Recently, I was at the Plains Retirement community talking with Town of Oneonta residents about their concerns regarding the proposed gas decompressor plant and tractor trailer truck delivery of fracked, CNG from PA. I turned to the topic of the proposed railyard development project with its mysterious gas energy source and a woman turned to me and said, oh, but we don't have to worry about that because it is in Oneonta.</p> <p>This concerned citizen's response reveals a major problem. The connection between the railyard project's preferred but unexamined energy-gas- and the proposed gas decompressor plant in the town of Oneonta has been obscured. Gas, and its GHG environmental impact, are unanalyzed in the GEIS. At best, this is incomplete, at worst, fraudulent- an official legerdemain.</p>



311	not dated	Katherine O'Donnell, Ph.D.	I ask you council members, Mayor Herzig, and county board representatives, from where will the gas come?
312	not dated	Katherine O'Donnell, Ph.D.	The 2018 unfunded OTSEGO NOW /IDA plan proposed a 25% increase in gas use in our area, a gas decompressor plant, and trucks bringing in Cracked gas from PA. It would involve a \$17.5 million price tag for our taxpayers, an increase in the amount of GHG that we put into the atmosphere, and a cost to the community in health and safety as well.
313	not dated	Katherine O'Donnell, Ph.D.	To move ahead with this project as presently conceived while the county has just created an energy taskforce designed to thoughtfully chart countywide energy plans is imprudent and irresponsible. To continue to hide the relationship and impact of the intended expansion of gas infrastructure in the town and the railyard project is illegal segmentation and legerdemain.
314	3/12/2019	Andrea Lister	<p>After reading the environmental impact statement, I am concerned about the fact that the statement does little to address the issue of emissions. It is clear that the rail-yard development requires a build out of natural gas from someplace. At a presentation by the IDA on August 8th 2018, the head of the IDA suggested that a Decompressor Facility be built in Oneonta on the preferred site of Pony Farm Road. He indicated a connection between this CNG facility and the plans to develop industry in the rail yard location. Nowhere in the GEIS is there any mention of this facility or the fact that the Town of Oneonta will be involved.</p> <p>There is no environmental impact or health impact studies anywhere regarding CNG Decompressor Facilities. Yet, such a facility is suggested in an area where there is not one but three senior communities, The Plains, Melody Village, and Peaceful Flats. There is no information regarding noise, odor, light pollution, emissions, or truck traffic. At this point I would be remiss if I failed to mention that science is urging us to reduce our dependence on fossil fuels. Natural Gas is a fossil fuel and far more potent as a greenhouse gas than CO2. What are we thinking when we plan to increase our natural gas by 25%? Clearly we are saying NO to the science that is urging us to change.</p> <p>New York State has pledged to reduce dependence on fossil fuels, of which natural gas is one, by 2040. Oneonta's plan to increase the build-out of natural gas is out of touch with that goal. I urge you look to the future, and plan on developing a plan for the rail-yards that is eco- friendly.</p>
315	3/4/2019	Otsego County Conservation Association, Inc. (OCCA)	<p><u>The Common Council should evaluate the environmental justice implications associated with the proposed project</u></p> <p>Environmental justice refers to the pursuit of fairness in environmental and land-use policies, especially the fair treatment of all races, ethnic groups, and socioeconomic classes. Environmental justice not only encompasses exposure to pollutants, it also encompasses the siting of Locally Unwanted Land-Uses (LULUs). If left unchecked, LULUs can undermine a neighborhood's sense of community and place.</p> <p>According to the New York State Department of Environmental Conservation's (DEC) Office of Environmental Justice (OEJ), the Study Area evaluated in the DGEIS is surrounded on two sides by potential Environmental Justice Communities. The first Environmental Justice Community encompasses Center City and Downtown Oneonta extending south toward Fonda Avenue. The Second Environmental Justice Community encompasses West Oneonta.1 The City of Oneonta contains six Census Tracts (5908, 5909, 5910, 5911, 5912, and 5913). The Study Area evaluated by the DGEIS lies within Census Tract 5911. According to a review of 2017 American Community Survey Statistics, Census Tract 5911 has the lowest household median income (\$41,377), highest poverty rate (34.9%), highest percentage of people without health insurance (14.9%), and the highest unemployment rate (11.1%) in the City of Oneonta. Further, the Census Tract 5911 contains the largest percentage of the C/I (Commercial/Industrial) District by land area in the City.</p>

Anderson & Sass (2004) suggest that disparities in participation by the poor and minorities in planning and regulatory processes are common. According to the American Planning Association's Planning Advisory Service (PAS) Report 549-550, limited participation in planning processes by low-income and/or minority populations can be affected by the timing and location of meetings, limited access to information, language and education barriers, and perceptions of powerlessness. Sherry Arnstein (1969) called for public involvement that involves true citizen power over land-use decisions, not merely token placation, consultation, or information, or other non-participatory interactions with government officials.

The public outreach sessions hosted at Riverside Elementary School and Greater Plains Elementary School on April 4 and 5, 2018 were examples of non-participatory interactions with government officials. Residents were given a fact sheet about the Railyard Development, were able to ask questions (placation), but were not given an opportunity to help plan the development or truly interact with what the Railyard Redevelopment would mean for their Community.

During the February 5, 2019, Common Council meeting, commenters on the proposed project were given three minutes to discuss their concerns related to the project, which did not allow many commenters to fully air all their concerns unless written comments were submitted as part of the official record.

According to PAS Report 549-550, When local land-use regulations allow LULUs, either by right or conditionally, neighborhood residents face uncertainty about whether their neighborhood will be subject to a LULU proposal. Similarly, the property owner could face uncertainty as to whether neighbors will organize to defeat the proposal. Both sides have additional economic costs, psychological costs, and relational costs (e.g., suspicion and animosity) resulting from the LULU proposal. The PAS Report 549/550 outlines suggestions as to how the flow of information related to project proposals can be improved to address potential environmental justice issues. These include but are not limited to:

- Creating a general community suggestion or community input system that allows public input on problems, issues, and ideas not currently on a decision-making body's agenda.
- Host communitywide planning input drop-by sessions at a central location, where residents can conveniently stop to register input on proposed plans or alternatives presented on displays through visual preference surveys.
- Disseminate information broadly, including through public workshops newsletters, postal mailings, notices distributed in utility bills or at public schools, a speaker's bureau, radio and television broadcasts, electronic mailings, Internet websites, and similar computer-based information networks.
- Involve community residents early in decision making about planning, zoning, permit decisions, public infrastructure, and the like; do not wait until plans are well developed or essentially completed.

Commissioner Policy 29 (CP-29) established by the DEC sets forth an additional public engagement strategy geared toward engaging members of Environmental Justice Communities in environmental reviews.

**To address the potential environmental justice issues related to the proposed project, OCCA recommends that the Common Council require the Applicant to conduct an environmental justice audit to evaluate potential environmental justice impacts related to the proposed project.** An environmental justice audit can be used to: identify the environmental and land-use problems and planning needs of an area or the entire locality; making the case for establishing a planning and regulatory program to seek environmental and land-use justice; supporting specific land-use and planning decisions; starting a neighborhood planning process

			<p>or series of neighborhood planning processes in areas where environmental and land-use conditions are disproportionately burdensome; and educating and involving public officials and the public about environmental and land-use injustices or problems. Page 47 of PAS Report 549-550 contains a specific list of the data needed to properly conduct an environmental justice audit.<sup>2</sup> It is OCCA's opinion that an environmental justice audit could serve to ensure that the proposed redevelopment of the Oneonta Railyards is inclusive and maximizes the potential benefits of the proposed project.</p> <p>1 <a href="https://www.dec.ny.gov/docs/permits_ej_operations_pdf/otsegoej.pdf">https://www.dec.ny.gov/docs/permits_ej_operations_pdf/otsegoej.pdf</a>  2 <a href="https://www.planning.org/piblications/report/9026874/">https://www.planning.org/piblications/report/9026874/</a></p>
316	3/4/2019	Otsego County Conservation Association, Inc. (OCCA)	<p><b><u>The Common Council should evaluate the City of Oneonta's Zoning Code and Municipal Code prior to moving forward on the GEIS.</u></b> As shown in OCCA's February 5th written comments and in Section 9.0 of the DGEIS, the Applicant is considering the construction or expansion of energy facilities to serve the redevelopment of the Oneonta Railyards. On Page 17 of the DGEIS, it is stated that while the project will require 40,000 MMBtus/year of natural gas, and there may not be any gas capacity to serve the site. Additionally, page 105 of the DGEIS suggests that proposals for energy development will be considered on a "case-by-case," basis. Further, the 2016 Railyard Study and Economic Development Plan prepared by Clark Patterson Lee Feasibility Study suggests that 8,500 linear feet of new natural gas mains would have to be constructed to properly serve the Railyard Site.</p> <p>§300-4 of the City of Oneonta's Zoning Code defines "Public Utilities" as follows: any facility or related equipment, including but not limited to all lines, pipes, transformers, poles, etc., performing an essential public service and subject to special governmental regulation. Nonessential components of public utility operations, such as general storage and maintenance facilities, are excluded from this definition. §300-47 of the City of Oneonta's Zoning Code states that "uses not specifically enumerated as permitted within this chapter are prohibited." According to §300-99 of the City of Oneonta's Zoning Code, public utilities are not listed as an allowable use in the C/I District. Therefore, any potential public utility development associated with a project in the C/I District such as the construction of electricity generating facilities or natural gas distribution facilities (i.e., the decompression station) would require a use variance.</p> <p>From a broader perspective, §149 of the City of Oneonta's Municipal Code refers to Gas Drilling within City Boundaries. §149 and its associated articles were adopted on June 7, 2011. §149-1 establishes the legislative findings related to the adoption of the aforementioned chapter. §149-1 C states that "the Common Council believes that the protection of residents, neighborhoods, and the natural environment constitutes the highest and best use of the police powers of this municipality." Additionally, §149-3 B establishes certain rights of natural communities. More specifically, "natural communities and ecosystems, including, but not limited to, wetlands, streams, rivers, aquifers, and other systems, possess the fundamental right to exist and flourish within the City of Oneonta. Residents of the City shall possess legal standing to enforce those rights on behalf of those natural communities and ecosystems." This posture taken by the City of Oneonta, while commendable, does not appear to have been evaluated in the DGEIS.</p> <p>The provisions in the City of Oneonta's Municipal Code and the Zoning Code create a contradiction related to the proposed development of energy infrastructure in the Oneonta Railyard. Since public utilities are not specifically listed as an allowable use in the Railyard, OCCA contends that they are prohibited. Further, given the City's emphasis on environmental protection, the construction of a large industrial facility and associated energy infrastructure does not mesh with the City's established policy positions. <b>As such, OCCA recommends that the City rezone to allow public utilities upon Site Plan Review in the C/I District and that the Applicant describe how the proposed project is consistent with §149 of the City of Oneonta's Municipal Code.</b></p>

317	3/4/2019	Otsego County Conservation Association, Inc. (OCCA)	The redevelopment of the Oneonta Rail yards, if facilitated in a manner consistent with the City's planning objectives, is an example of "smart growth" that will lead to job creation and improvement of the local economy. The preparation of a GEIS is intended to be an iterative, bottom-up process, with input from the public strengthening the final document that is approved by the Lead Agency. Comments are not intended to obstruct a review process, but rather they are intended to help the Lead Agency's deliberations as they consider subsequent drafts of the GEIS. As previously stated, OCCA looks forward to having the opportunity to work with Delaware Engineering, the City of Oneonta, and the Applicant toward the eventual completion of the Final GEIS (FGEIS).
318	not dated	Otsego 2000, Inc.	<p><b>INTRODUCTION</b></p> <p>Otsego 2000, Inc. respectfully submits the following comments on the Draft Generic Environmental Impact Statement for the Oneonta Railyards Redevelopment Project ("DGEIS"). Otsego 2000, a 501c3 public charity headquartered in Cooperstown, New York, is dedicated to the protection of the historic, agricultural, recreational, and environmental assets of our region.</p> <p>For the reasons set forth below, the DGEIS is seriously flawed and is in fact a "ghost." Notwithstanding that it is over 110 pages, with headings, tables, and repeated references to environmental buzzwords, it is entirely lacking in substance. The DGEIS fails to supply necessary standards and thresholds concerning which subsequent actions would require future environmental review, an adequate discussion of a reasonable range of alternatives to the project and its future phases, cumulative impacts analysis, or any requirements for mitigation of identified impacts. The applicant, the County of Otsego Industrial Development Agency ("COIDA") appears to be seeking to shortcut subsequent site-specific environmental reviews by proceeding through an insufficient "generic" process in violation of the New York State Environmental Quality Review Act ("SEQRA").</p> <p>Factual inconsistencies and omissions in the DGEIS are pervasive and significant. Among the most notable omissions are related proposals disclosed by the same applicant, COIDA, to construct extensive energy infrastructure to support the project. The DGEIS fails to address or even include plans disclosed by COIDA in its CFA application submitted on July 26, 2018 to build a \$17.5 million compressed natural gas ("CNG") decompressor station in the Town of Oneonta, supplied by daily deliveries of CNG in heavy tractor-trailer trucks, a \$50-100 million expansion of the DeRuyter pipeline to supply gas to the Railyards project, and miles of pipeline which will be needed to connect the DeRuyter and/or decompressor station to the Railyards site.</p> <p>More recently, COIDA has discussed plans for a power plant to be sited at the Railyards to supply electricity to the site. None of these plans were disclosed until after the adoption of the Final Scoping Document for the Railyards project and after public comment on the Scoping Document was closed.</p> <p>The Mayor of Oneonta has stated by letter, dated October 15, 2018, that he was "entirely unaware" of the gas infrastructure being proposed by COIDA until after the Scoping Period was closed. The DGEIS must be revised to take this new information into account and correct the many other errors and omissions discussed herein.</p>
319	not dated	Otsego 2000, Inc.	<p><b>DISCUSSION OF FACTS</b></p> <p><b>A. THE DGEIS DEFERS ALL ANALYSIS TO FUTURE PERMITS AND PLANS</b></p> <p>A generic environmental impact statement should "set forth specific conditions or criteria under which future actions will be undertaken or approved, including requirements for any subsequent SEQR compliance." (6 NYCRR § 617.10(c); See also, SEQRA Handbook, Section H (GEIS should consider "[t]hresholds and conditions that would trigger the need for supplemental determinations of significance or site-specific EISs..."). The DGEIS fails to set forth these</p>

			<p>necessary conditions, criteria, or thresholds for review of future phases of the project. The DGEIS admits that future site-specific environmental review may be necessary and concedes that thresholds are required, but fails to address what they will be:</p> <p>This DGEIS establishes thresholds for environmental review and impacts within the Study Area that will lay the groundwork for permitting and construction projects of the type contemplated within the scope of this study. At the time a site specific project is determined, additional environmental review under SEQRA <i>may be necessary...</i> (italics added; p. 9; see also p. 92.)</p> <p>The DGEIS promises that "feasible" mitigation measures will be offered for each "identified" impact without addressing what is feasible, or discussing mitigation of impacts (such as energy supply) which are not identified. (italics added; p. 6.) Later, the DGEIS states that "the Railyards site has the potential to be redeveloped without substantial unavoidable adverse impacts for which mitigation measures are not available." (italics added; p. 101.) However, the DGEIS fails to keep this promise. The DGEIS never discusses or establishes how the project would be developed to avoid substantial adverse impacts.</p>
320	not dated	Otsego 2000, Inc.	<p>The DGEIS makes only vague references to future permits which may be required to be issued by other agencies. The DGEIS also states "future actions will require additional public hearings to address specific community concerns" (p. 92). In this way, the City of Oneonta, as SEQRA Lead Agency, improperly defers consideration of environmental impacts to other agencies and to future hearings without setting thresholds or requirements which will trigger future site-specific review or public hearings.</p>
321	not dated	Otsego 2000, Inc.	<p>Electricity: The DGEIS admits that an electrical load estimated at 7.7 MW will be needed, and that the capacity to supply this load "does not currently exist." (italics added; p. 17.) However, no specific plans to create line capacity or to build a power plant to supply this electricity are addressed in the DGEIS. The DGEIS states only that "NYSEG will be required to provide more details on upgrades, conversions, construction and costs to customers." (Id.) This is inconsistent with recent proposals to construct a power plant at the site undertaken by COIDA.</p>
322	not dated	Otsego 2000, Inc.	<p>Natural Gas: The DGEIS also fails to disclose any plans to supply natural gas to the site. The DGEIS confirms that natural gas is not available, stating "nor is natural gas currently available." (italics added; p. 6.) The DGEIS then states that "[n]atural gas usage is estimated at 40,000 MMBtu per year..." but, "[c]urgently capacity in the natural gas local distribution may not be available..." (italics added; p. 17). The DGEIS entirely fails to address how natural gas will be supplied to the project, including a decompressor station supplied by CNG trucks in the Town of Oneonta, and expansion of the DeRuyter pipeline. These plans were disclosed by COIDA for the first time, in a grant application dated July 26, 2018, after the Scoping Period for the DGEIS was closed.</p> <p>The DGEIS defers all consideration of energy supply and conservation to an unspecified future date and to other agencies. It states: "As specific development plans are prepared NYSEG will be consulted." (italics added; p. 17.) See also: "Future proposals for power supply to the redevelopment site will be addressed at the time there is a redevelopment proposal." (italics added; p. 105, and p. 76.) In the closing pages, the DGEIS addresses options for energy supply in a vacuum, without any relationship to the redevelopment plan being proposed. After providing simplistic dictionary descriptions of energy sources including geothermal, solar thermal, solar photovoltaic, wind, biomass, and CNG, the DGEIS merely concludes: "In the future, when the energy demands of a specific redevelopment plan are known, an evaluation of power sources will be conducted at that time and any relevant mitigation measures identified... At that time additional environmental review may be required." (italics added; p. 113.) This directly contradicts plans to build extensive infrastructure to supply gas to the site disclosed by the applicant after the Scoping Period was closed.</p>

323	not dated	Otsego 2000, Inc.	<p>Costs: No adverse impacts on community services are discussed in the DGEIS. No impacts on schools, recreation, Police or Fire departments, Emergency Services, health care, or community character are identified (pgs. 69-86). This is misleading because a Housing Needs Assessment attached as Appendix H to the DGEIS shows that sufficient housing stock for new industrial workers does not currently exist. (Appendix H, pp 10-11.) Also, existing manufacturing enterprises do not have enough workers:</p> <p>According to Barbara Ann Heegan, President and CEO of the Otsego County Chamber of Commerce, the area's manufacturers have reported strong growth over the past one to two years and have over 140 current open positions. Filling these positions with skilled workers has been a challenge, and the Chamber of Commerce is partnering with local school districts to create vocational programs. (<i>italics added</i>; Appendix H, p. 25.)</p> <p>Most significantly, the costs of the redevelopment are not addressed. The costs to build a decompressor station at the Pony Farm industrial site in the Town of Oneonta will exceed \$17.5 million, which the Executive Director of COIDA, Mr. Jody Zakrevsky, admitted were "ridiculous." The DeRuyter pipeline expansion was estimated as \$50-100 million. The DGEIS also fails to address whether Payment In Lieu of Taxes (PILOT) agreements will be offered to developers at the Railyards, further burdening the community. Data from the New York State Comptroller shows the amount of money spent by COIDA to create a single job in the County is more than \$76,000, greatly exceeding costs for neighboring counties. In 2016, expenses in Otsego County were \$33,483 per job gained. In addition, "Net Tax Exemption" per job gained was \$43,000. Acceptance of the DGEIS without an economic analysis of costs, including secondary and related costs, in these circumstances is an abuse of discretion.</p>
324	not dated	Otsego 2000, Inc.	<p>Wetlands: The Wetlands Delineation Report attached as Appendix A to the DGEIS shows that the redevelopment site contains 27 acres of federal jurisdictional wetlands and depicts 100 ft. buffers to those wetlands. However, the DGEIS ignores the fact that "preferred option 3" shows 900,000 sq. ft. of impervious new buildings squarely within the boundaries of the wetlands (before including parking, access roads, and utilities). Such development cannot occur without serious adverse environmental impacts.</p> <p>The DGEIS admits that wetlands mitigation will be required, but no plans, thresholds or requirements for wetland mitigation are addressed. The DGEIS suggests only that reasons for choosing a particular mitigation strategy should be documented as part of the permitting process..." (<i>italics added</i>; p. 43.) Lacking specificity, the DGEIS simply says that "current conditions may allow for a certain amount of wetlands mitigation on-site, through the restoration of the existing wetlands that remain after redevelopment." (<i>italics added</i>; p. 44.) This is clearly insufficient.</p> <p>Dr. Vogler, a Wetlands Delineation expert and Professor at SUNY Oneonta, has submitted important comments on the wetlands analysis in the DGEIS. Dr. Vogler concludes that the value of the wetlands for the ecosystem in terms of water quality and flood management are understated in the DGEIS. (Comments submitted by Donna Vogler, Ph.D., attached here as Exhibit A.) She also explains that the wetlands are found on a "mucky soil type" poorly suited for development, stating: "saturation of this soil at this site is a perennial condition.... [t]o place buildings on such ground is foolhardy and would require extensive civil engineering to make it stable for commercial development."</p> <p>These are serious defects in the redevelopment plan and must be addressed in the DGEIS.</p>

325	not dated	Otsego 2000, Inc.	<p>Site Contamination: The DGEIS confirms that the site is currently contaminated with industrial chemicals. It states: "several sediment, surface soil, and subsurface soil samples contained SVOCs and metals at concentrations greater than the respective 6NYCRR Part 375 Commercial SCOs..." (italics added; p. 34.) Yet amazingly, the DGEIS concludes that this is acceptable because harmful chemicals (arsenic and benzo(a)pyrene) were also found offsite, stating that this "may represent typical background concentrations" and "further investigation or remedial activities did not appear to be warranted." (Id.) Thus, the DGEIS authors seem to suggest that failure to remediate a contaminated site is acceptable if it is located next to another contaminated site. This is an inappropriate and absurd conclusion.</p> <p>Given the property's historic industrial use and known contamination, proper analysis of soil contamination should have been included in the DGEIS, but was not. Potential air and water quality impacts to neighboring residents, an Environmental Justice community, impact to construction workers, and a future work force at the site are all ignored by the DGEIS. Dr. Ron Bishop, a Professor of Chemistry at SUNY Oneonta, reviewed the DGEIS provisions related to topography and soils. (See Comments of Dr. Ron Bishop, Ph.D. attached here as Exhibit B.) Dr. Bishop studied the data regarding contamination at the site and noted that "mixtures of hazardous materials should be regarded as more potentially harmful than individual components...but this guidance is absent from the DGEIS". He concluded that redevelopment at the site may cause significant health impacts: "People-especially children-who live and work downwind would be at risk of ingesting or inhaling fine particulate matter which remains in the air longer and travels farther than ordinary dust grains." These comments must not be ignored.</p> <p>The DGEIS also admits that the Railyards site is littered with significant amounts of construction debris, fill material, and trash from past uses and illegal dumping (pgs. 12, 34, 85, 86, and 100). However, it merely states that property owners will be responsible for cleanup prior to construction. The DGEIS fails to explain how this will be required of future property owners, or enforced. The DGEIS lacks any clear commitment by the City to pursue a full cleanup and remediation plan for the Railyards. This is unacceptable.</p>
326	not dated	Otsego 2000, Inc.	<p>Storm Water Management: The DGEIS states that "[s]tormwater management will be designed to maintain as much of the Study Area's natural hydrology as possible" without any specification as to how this will be accomplished or what is "possible". (italics added; pgs. 20-21.) In point of fact, the "preferred alternative" with 900,000 sq. ft. of building area assures that natural hydrology will not be protected because wetlands and buffers would be directly impacted by development and almost no area would exist for effective stormwater retention landward of those features. This is made even more problematic by the presence of a stream that passes lengthwise through the property, and that could flush poorly-treated stormwater and soil contaminants liberated by earthmoving into downstream properties and the Susquehanna River.</p> <p>Although the DGEIS contains a soil assessment and general description of how soil characteristics could affect stormwater management in Appendix B, it fails to provide any comparative assessment of potential stormwater management options as required by SEQRA. The DGEIS performs no analysis of flow volumes, elevations, depth to water table, or other relevant site characteristics. Instead, the DGEIS includes a generalized description of the permitting process, such as the purposes of a SPDES General Permit, Individual Permit, and Stormwater Pollution Prevention Plan. The DGEIS states that "project construction sequencing" will limit the area of soil disturbance to less than five acres at a time, but gives no explanation for how this will be accomplished. Totally missing is any requirement for a master plan for stormwater management over the entire site, critical to ensure protection of water quality. Instead, the DGEIS states that stormwater management will be the responsibility of "future property owners" but neglects to address how this will occur if the site has multiple owners (p. 21). These are severe defects.</p>

327	not dated	Otsego 2000, Inc.	<p>Traffic: The DGEIS outlines a range of traffic concerns without addressing what is actually proposed. In this vein, the DGEIS recommends reconfiguration of Lower River Street, upgrade of Roundhouse Road to City roadway standards, consideration of widening Fonda Avenue, a sight distance evaluation of Lower River Street during detailed design based on then current conditions, and redirection of heavy traffic to Lower River Street and Oneida Street. (pgs. 64-66). These recommendations are apparently based on a Traffic Impact and Access Study (TIAS) for a 50-acre development attached as Appendix F to the DGEIS. The TIAS projects 365 additional vehicle trips per day at the site during AM peak hours and 288 additional vehicle trips exiting during PM peak hours. (Appendix F, p. 33.). However, there is no discussion in the DGEIS as to how the increase in traffic will impact the residents actually using the local roads.</p> <p>Significantly, the DGEIS also fails to address future use of local roads by heavy CNG trucks making deliveries to the planned decompressor station in Town of Oneonta. These trucks, making deliveries to a similar facility in Herkimer County, have already caused several serious accidents along their route in Otsego County and beyond. Clearly, discussion of road and traffic impacts is inadequate.</p>
328	not dated	Otsego 2000, Inc.	<p>Potable Water: The DGEIS defers specific plans for water supply, access and design of water distribution and admits such plans are missing and "will be developed" (italics added; p. 16.)</p>
329	not dated	Otsego 2000, Inc.	<p>Sewer: The DGEIS defers plans for wastewater treatment stating only that such plans "will be developed" (italics added; p. 17.)</p>
330	not dated	Otsego 2000, Inc.	<p>Telecommunications: The DGEIS provides no plans for telecommunication service, stating only that this "will be coordinated along within a final redevelopment plan," which is not provided. (italics added; p. 20.)</p>
331	not dated	Otsego 2000, Inc.	<p>1. Size of the Project is Repeatedly Misstated</p> <p>The DGEIS repeatedly contradicts itself about something so basic as the actual size and scope of the proposed redevelopment. The DGEIS states that "COIDA will prepare a redevelopment master plan and economic development strategy for approximately 50 acres of an 80-acre site owned by COIDA in the area known as the Oneonta Railyards (Study Area) ..." (pp. 3, 4, and 45).</p> <p>However, elsewhere the DGEIS states that environmental review was conducted on "an area known as the Oneonta Railyards, an area of approximately 200 acres composed of 17 parcels" (p. 8). See also, "Project Site" defined stated as: "The overall Railyards area includes approximately 200 acres..." (p. 11).</p> <p>Finally, the DGEIS states that development may include property owned by COIDA, but may also include other properties and would be "phased according to property acquisition (where possible), or the interest of the current owner of the other parcels..." (p. 92). See also Options 1a, 1b, and 2, which contain the same language (pgs. 92-93).</p> <p>The scope of the proposed redevelopment is entirely unlimited and therefore uncertain. This is unacceptable because it taints the entire supposed analysis of environmental impacts and potential mitigation. As the size of the project increases, environmental impacts will necessarily increase as well. It is not rational to assume that quadrupling the size of the project from 50 to 200 acres (or more) would not have additional, substantial environmental impacts. The DGEIS is required to accurately describe the size, scope, and setting of the proposed redevelopment.</p>



332	not dated	Otsego 2000, Inc.	<p>2. A Master Plan Is Never Identified</p> <p>The DGEIS is also confused as to whether a master plan for the project exists. The DGEIS states that COIDA "will prepare a master plan".... (italics added; p. 3). Later, the DGEIS states its "goal" is "to prepare a redevelopment master plan and economic development strategy..." (p. 4). However, no master plan or economic development plan is submitted.</p> <p>Later still, the DGEIS states "[t]he master plan has been prepared..." (p. 5). Eventually the DGEIS states that Option 3 is the "Master Plan" (p. 13). This is incoherent. The public is entitled to know what the master plan is and where it is presented.</p>
333	not dated	Otsego 2000, Inc.	<p>3. Full "Build-Out" Is Never Explained or Described</p> <p>The DGEIS states it "will outline the proposed redevelopment at full build-out...the potential environmental impacts and the likely mitigation measures that could reduce or eliminate the environmental impacts"... (p. 5). However, a full build-out analysis is never presented or addressed. DGEIS, <i>passim</i>. Later, the DGEIS states the Redevelopment Plan is based on a five year build-out plan which is considered to be the most expeditious timeline for redevelopment..." (italics added; p. 52).</p> <p>The public is never told for what period of time the redevelopment plan is expected to be in place, and over what period of time development impacts will be considered. Is the build-out limited to the next five years, or over decades, or more? Does it include 50, or 200 acres, or more? These basic matters should have been made clear and explained in the DGEIS. SEQRA provides that the public has a right to know what is being proposed before it can meaningfully comment on anticipated environmental impacts therefrom.</p>
334	not dated	Otsego 2000, Inc.	<p>A. THE DGEIS MUST ADDRESS ALL IMPACTS AND IDENTIFY THRESHOLDS FOR FUTURE REVIEW</p> <p>Following the filing of a DGEIS, "[n]o further SEQR compliance is required if a subsequent proposed action will be carried out in conformance with the conditions and thresholds established for such actions in the generic EIS or its findings statement." (6 NYCRR § 617.10(d)(1).) However, SEQRA regulations provide that a:</p> <p>supplement to the final generic EIS must be prepared if the subsequent proposed action was not addressed or was not adequately addressed in the generic EIS and the subsequent action may have one or more significant adverse environmental impacts. (6 NYCRR § 617.10(d)(4).)</p> <p>A generic EIS must also "describe any potential that proposed actions may have for triggering further development. "If such a 'triggering' potential is identified, the anticipated pattern and sequence of actions resulting from the initial proposal should be assessed." (Id.) "The generic EIS should identify upper limits of acceptable growth inducement in order to provide guidance to the decision maker." (Id.)</p> <p>The DGEIS being considered by the Common Council does not comply with these basic requirements. Again, and again, the DGEIS concedes that future environmental review "may" be required, without setting forth any standards for when future site-specific environmental review would be triggered. The DGEIS also entirely fails to address growth inducing considerations such as the related expansion of fossil fuel energy in the region. Thus, the DGEIS appears designed to limit environmental review rather than support reasoned decision-making. This is an abuse of the generic EIS process.</p>

335	not dated	Otsego 2000, Inc.	<p><b>B. SEQRA REQUIRES A “HARD LOOK” BASED ON SUBSTANTIAL EVIDENCE</b></p> <p>The DGEIS’s failure to develop conditions for approval and/or thresholds for further review in areas of environmental concern is emblematic of a failure to take a “hard look” at the environmental impacts identified. In order to satisfy SEQRA’s “hard look” requirement, the Common Council must be able to demonstrate that it took the relevant areas of environmental concern seriously:</p> <p>While the term ‘hard look’ may be infelicitous, it recognizes the intent of the Legislature in SEQRA that its concerns that environmental issues are serious and that in making decisions which may have the potential to cause a material adverse environmental effect, they should take such concerns seriously. <i>Nash Metalware Co., Inc. v. Council of City of N.Y.</i>, 14 Misc.3d 1211(A), 836 N.Y.S.2d 487, 2006 WL 3849065 (Sup. Ct. N.Y. Dec. 21, 2006).</p> <p>See also, <i>County of Orange v. Village of Kiryas Joel</i>, 44 A.D.3d 765, 844 N.Y.S.2d 57 (2d Dept. Oct. 9, 2007), <i>aff’g</i>, 11 Misc.3d 1056(A), 815 N.Y.S.2d 494 (Sup. Ct. Orange Co. 2005) (“One cannot presume that the requisite ‘hard look’ was taken based on the thickness of the DEIS or because the consultants were highly regarded in their fields...”). In <i>County of Orange</i>, failure to assess the effect on wetlands and the decision to defer these analyses until the design phase was found to defeat the meaningful review required by SEQRA. In <i>H.O.M.E.S. v. New York State Urban Development Corp.</i>, 69 A.D.2d 222, 418 N.Y.S.2d 827, 831-32 (4th Dept. 1979) the court held an agency failed to take a “hard look” and acted “in an Alice-In-Wonderland manner” where it “vaguely recognized” that adverse impacts would occur, but relied only on general assurances that future problems would be mitigated.</p> <p>In <i>Penfield Panorama Area Cmty., Inc. v. Town of Penfield Planning Bd.</i>, 253 A.D.2d 342, 688 N.Y.S.2d 848, 854 (4th Dept. 1999), the EIS stated that “‘primary areas of concern’ containing hazardous waste ha[d] been identified, that ‘additional characterization was required,’ and “that ‘some site clean-up may also be required.’” <i>Id.</i> at 853. Rather than requiring development of a remediation plan, the Planning Board “conditioned its approval of the project on [the Applicant’s] agreement to get approval of a site remediation plan from NYDEC and the County Department of Health] before any construction begins.” <i>Id.</i> The Penfield Court rejected this approach, holding:</p> <p>deferring resolution of the remediation was improper because it shields the remediation plan from public scrutiny.... by deferring resolution of the hazardous waste issue, the Planning Board failed to take the requisite hard look at an area of environmental concern. <i>Id.</i> at 854.</p> <p>Similarly, in <i>AC I Shore Road, LLC v. Incorporated Village of Great Neck</i>, 841 N.Y.S.2d 344, 347 (2nd Dept. 2007), the Court found that a DGEIS was inadequate because it failed to take the requisite ‘hard look’” at two particular areas of environmental concern, one of which being potentially contaminated soil, holding:</p> <p>while the DGEIS noted that the soil in the area to be rezoned is potentially contaminated... the DGEIS and the SEQRA findings statement simply concluded that the petitioner’s Site will be remediated in accordance with applicable standards and requirements, without examining whether the area can be remediated to residential standards, the significance of impacts, preparation of an EIS and a determination on mitigation of those effects. The fact that other agencies may have independent obligations to analyze the potential impacts of the facility has no bearing on the DEC’s own obligation, as lead agency to analyze the existing areas of environmental concern. <i>Id.</i> (citations omitted)</p> <p>The DGEIS contains similar flawed reasoning, is rife with omissions, and replete with deferral of all foreseeable environmental review which will be necessary, including wetlands protection, contaminated soil remediation, energy and natural gas infrastructure supply, traffic, health, and safety.</p>
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336	not dated	Otsego 2000, Inc.	<p><b>C. CUMULATIVE IMPACTS ARE IGNORED</b></p> <p>Section 4 of the DGEIS is titled "Cumulative Impacts Analysis." However, it lacks any content that remotely resembles an analysis of cumulative impacts potentially resulting from development of the Railyards. Instead this section of the DGEIS contains an unrelated summary of policies from the 2007 Comprehensive Plan, now outdated, various statistics about growth and types of jobs, and a description of a few projects located elsewhere in the City. (pgs. 86-91.)</p> <p>Regarding matters that should have been considered as part of a cumulative impact analysis, the DGEIS falsely asserts "There are currently no other large-scale projects proposed for the area" (p. 91). This is demonstrably untrue.</p> <p>Public records show that COIDA is presently working to aggressively expand energy infrastructure to support the Railyards project in four ways: 1) by planning a gas decompressor station at a site owned by COIDA in the Town of Oneonta (called Pony Farm) to bring CNG trucks to deliver gas to the area; 2) by supporting expansion of the DeRuyter pipeline which would increase the capacity of the 8-inch pipeline to 10 inches or 12 inches and increase gas supply in the region by as much as 38% or 125%, respectively; and 3) by installing miles of gas pipelines and infrastructure to bring gas from the Pony Farm site and the expanded DeRuyter pipeline to the Railyards. This was presented in a NYS Consolidated Funding Application submitted by COIDA to the State of New York on July 26, 2018.</p> <p>In addition, recent COIDA Board Minutes confirm that COIDA is in discussions with General Electric's Power Distributed Energy Group to prepare a proposal for a "community solution" to electrical energy needs at the Railyards (October 2018, Board Minutes). GE has asked for \$10,000 to develop electrical/natural gas infrastructure plans including plans for construction of a microgrid (fueled by combustion of wood or gas) to supply electricity to the project. (January 2019, Board Minutes).</p> <p>The related developments at issue here, proposed by the same applicant, at the same time, intended to supply electricity and gas to the same project, and the cumulative impacts they represent, must be addressed in a coordinated review. It is well established that SEQRA mandates a lead agency to undertake an analysis of incremental or increased impacts when the impacts of a project are added to other past, present and reasonably foreseeable future actions. (The SEQR Handbook, p.41.)</p> <p>In <i>Segal v. Town of Thompson</i>, 182 A.D.2d 1043, 583 N.Y.S.2d 50 (3rd Dept. 1992), a Town's attempt to establish a water and sewer district was annulled for failure to assess impacts associated with the development of individual lots within the district. See also, <i>Sun Co. Inc. v. City of Syracuse Indus. Develop. Agency</i>, 209 A.D.2d 34, 625 N.Y.S.2d 371, 379-81 (4th Dept. 1995) (city's preparation of a "substantive working document that serves as a blueprint" for waterfront development is a larger plan requiring City to assess cumulative impacts "reasonably related" to action).</p> <p>Here, the Common Council is bound to consider the cumulative impacts of the redevelopment, including planned energy infrastructure development for natural gas supply and electrical power generation. The DGEIS throws up its hands and defers this analysis to another time or governmental body. This violates SEQRA.</p>
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337	not dated	Otsego 2000, Inc.	<p><b>D. THE DGEIS RELIES ON IMPERMISSIBLE SEGMENTED REVIEW</b></p> <p>SEQRA discourages "segmentation" of environmental review<sup>1</sup> which is defined as "the division of the environmental review of an action such that various activities or stages are addressed as though they were independent, unrelated activities, needing individual determinations of significance." Id. at Sec. 617.2(ag). See also, <i>Cumulative Impacts and Segmentation</i>, Alan J. Knauf (<a href="https://www.nyenvlaw.com/wp-content/uploads/2014/11/Cumulative-Impacts-and-Segmentation.pdf">https://www.nyenvlaw.com/wp-content/uploads/2014/11/Cumulative-Impacts-and-Segmentation.pdf</a>).</p> <p>The reasons for this rule are obvious. If a proposed action can be broken into parts to be considered separately, or later in time by different agencies, each component may seem insignificant, although taken together the combined action is clearly significant. Accordingly, "[e]nvironmental review of the entire project is required before 'any significant authorization is granted for a specific proposal.'" <i>Kirk-Astor Drive Neighborhood Assn. v. Town Board of Town of Pittsford</i>, 106 A.D.2d 868,869,483 N.Y.S.2d 526,528 (4th Dept. 1984) (SEQRA review of rezoning had to consider the office park that was planned for the land); <i>Taxpayers Opposed to Floodmart, Ltd. v. City of Hornell Industrial Development Agency</i>, 212 A.D. 2d 958,624 N.Y.S. 2d 689 (4th Dept. 1995) (environmental review of a proposed annexation also had to consider a Wal-Mart proposed for the land.); <i>Sun Company, Inc. v. City of Syracuse Industrial Development Agency</i>, 209 A.D.2d 34, 625 N.Y.S. 2d 689 (4th Dept. 1995) (Carousel Landing Project could not be segmented from environmental review of the redevelopment plans for the entire Onondaga Lakefront Area.)</p> <p>The DGEIS should not encourage segmented environmental review of the project impacts. Deferring consideration of environmental factors, including planned development of energy infrastructure, brownfield remediation, wetlands protection, stormwater control, road alterations, and issues associated with future permit applications to other agencies is improper. SEQRA requires the Common Council, as Lead Agency, to analyze all environmental impacts or to set forth specific reasons why this cannot be done, while ensuring that segmented review will be no less protective of the environment. This has not been done.</p> <p><sup>1</sup> "If a lead agency believes that circumstances warrant a segmented review, it must clearly state in its determination of significance, and any subsequent EIS, the supporting reasons and must demonstrate that such review is clearly no less protective of the environment. Related actions should be identified and discussed to the fullest extent possible." 6 NYCRR § 617.3(g)(1).</p>
338	not dated	Otsego 2000, Inc.	<p><b>E. ALTERNATIVES WERE NOT SUBSTANTIVELY CONSIDERED</b></p> <p>SEQRA requires the evaluation of project alternatives which could reduce adverse environmental impacts. However, the only alternatives considered by the Railyards DGEIS were for potential building site plans, distinguishable from each other only by the number, size, and placement of buildings. Contrary to the intent of SEQRA, the DGEIS fails to perform any analysis of alternatives for other key aspects of the project, including notably land use, energy and stormwater management (pgs. 91-98).</p> <p>With respect to land use, the DGEIS considers only industrial development, in fact admitting that the only relevant sectors considered were:</p> <p>food processing, brewing/manufacturing, bottling/canning/packaging, cost storage [sic], public access import and export, general distribution, cold/frozen/controlled distribution, advanced manufacturing, food hub/collection and packaging, warehouse/storage, distilling and raw material storage, barrel and storage/bottling and packaging, distribution/export (p. 13; and Tables 2.3.5a, 2.3.5b at pgs. 18-19).</p> <p>At no time does the DGEIS consider alternatives to industrial development, such as high-tech or information-based uses, which may be more suited to attract and keep workers in the 21st century, especially in a city that is home to two universities.</p>

With respect to energy, the DGEIS provides only dictionary descriptions of potential sources, including geothermal, solar thermal, solar photovoltaic, wind, biomass, and compressed natural gas (pgs. 105-111.) No substantive analysis comparing the applicability, cost, or environmental appropriateness of these potential sources of energy is included, and no preferred alternatives or decisions were made in the DGEIS regarding their use.

For the building site plan, the DGEIS selects Option 3 as the "preferred alternative" (p. 13-14). However, it neglects to substantively analyze any site characteristics or potential environmental impacts necessary to make an informed decision regarding this alternative. Critical to such an analysis is the consideration of wetland protection and stormwater design, which might require a smaller building footprint. The DGEIS does not even approximate parameters of what would constitute an effective stormwater management system, providing no calculations whatsoever to demonstrate the feasibility of water retention and treatment for different building site plans (DGEIS, *passim*).

The alternative selected, Option 3, provides for five buildings and over 900,000 sq. ft. of floor area, severely impacts on-site wetlands, invades buffers to those wetlands, and allows almost no room for an effective stormwater management system. On the other hand, Option 4 has a more compact building footprint (615,650 sq. ft.), would preserve the integrity of wetlands on the property, and would provide greater capacity for effective stormwater treatment. (p. 93-94; figure 5.1.4, p. 98.)

In section 6, titled "Unavoidable Adverse Impacts," the DGEIS attempts to justify dismissing this alternative but fails, stating:

This less intense redevelopment plan *is feasible as far as it is possible to design such development and avoid impact to the wetlands and stream*; however, the economic viability relative to market demands is *not known*. ...A smaller footprint...would require *less energy for both operations and heating and cooling*. (italics added; p. 101.)

Clearly, the vague assertion that the economic viability of Option 4 is "not known" does not constitute an analysis. It is the purpose of a GEIS to evaluate the economic viability of alternatives. Significantly, the DGEIS admits that design and development of Option 4 to avoid wetland and stream impacts is feasible, which contradicts the notion of it presenting "unavoidable adverse impacts." Furthermore, the DGEIS acknowledges that this option would require less energy.

The DGEIS also entirely fails to consider an "Eco-Park" at the site which could be constructed with a net-zero, or near net-zero carbon footprint, provide for low-impact sustainable uses, and limit the size of development to ensure protection of wetlands and effective stormwater management (similar in size to Option 4). This could be a major asset to the city. In fact, during the public hearing on March 8, 2019, the Mayor of Oneonta stated that he supports the idea of an eco-park. Sustainable development is also promoted in the city's new draft Comprehensive Plan. Failure of the DGEIS to consider and advance such an alternative must be corrected.

339	not dated	Otsego 2000, Inc.	<p><b>F. THE DGEIS SHOULD NOT HAVE BEEN ACCEPTED UNTIL THE CITY OF ONEONTA'S COMPREHENSIVE PLAN AND A COUNTYWIDE ENERGY TASK FORCE REPORT ARE COMPLETED</b></p> <p>The City of Oneonta is currently developing a new Comprehensive Plan, an important effort which requires a large commitment of resources and time. It is premature and irrational to rush through a major industrial development in the City before the Comprehensive Plan is adopted. Consideration of the DGEIS should have awaited its completion. In addition, the Otsego County Board of Representatives has recently announced creation of the Otsego County Energy Task Force. A Leadership Committee and various sub-committees have been appointed, with broad participation from members of the community. The Task Force will work to identify current and future energy needs, including identification of strengths and weaknesses of current energy infrastructure, and will develop a plan for meeting energy needs in Otsego County. A massive industrial development of as much as 200 acres in the heart of the City of Oneonta, that will exacerbate energy needs and cause environmental harm, will have adverse impacts for generations to come. Acceptance of the DGEIS should have waited until the County Task Force completed its work. It is arbitrary and capricious to ignore ongoing planning efforts and to consider a project of this scale before those plans can be completed.</p>
340	not dated	Otsego 2000, Inc.	<p><b>G. SEQRA NOW REQUIRES CONSIDERATION OF CLIMATE CHANGE</b></p> <p>On June 27, 2018, the New York State Department of Environmental Conservation (NYSDEC) adopted the first major revisions to its regulations implementing SEQRA in over 20 years. The amendments took effect January 1, 2019, before the DGEIS was accepted. These amendments introduce climate change impacts into the implementing regulations that all agencies must follow. The amended regulations for the first time expressly require an EIS to detail strategies to mitigate a project's likely contributions to climate change. Two primary components must be addressed: (1) mitigation of the greenhouse gas emissions that cause and contribute to climate change; and (2) a project's vulnerability or resiliency to the effects of climate change, which in turn may affect the nature or significance of a project's environmental impacts. 6 NYCRR § 617.9(b). The Railyards project proposed in the DGEIS will result in additional greenhouse gas emissions, and may be vulnerable to the hazards brought about by climate change, experiencing greater risk itself or imposing additional risks and impacts on the local environment and communities. Failure of the DGEIS to address new requirements for the consideration of climate change impacts is a fatal omission.</p>
341	not dated	Otsego 2000, Inc.	<p>For all of the reasons stated above, Otsego 2000 urges the Common Council to address the serious deficiencies in the DGEIS. The Common Council must take the necessary time to fulfill its substantial and significant role as SEQRA Lead Agency to undertake factual analyses regarding each of the potential environmental impacts of the proposed redevelopment, including energy supply, wetlands protection, brownfield remediation, and traffic, among others. Only then can the public participate in a meaningful review. Until this record is corrected, the Common Council will not be in any position to finalize its required SEQRA findings.</p>
342	10/18/2018	Ostego 2000, Inc.	<p>Dear Mayor Herzig:</p> <p>Thank you for your letter of October 15, 2018 to our counsel regarding environmental review of the County of Otsego Industrial Development Agency's (COIDA) proposed Rail yards development. Your letter confirms that the City of Oneonta Common Council was entirely unaware of the related proposal by the same applicant to build a large gas plant in the Town of Oneonta to supply gas to the Rail yards development in the City of Oneonta. We were similarly unaware of these plans.</p>

343	10/18/2018	Ostego 2000, Inc.	The failure of COIDA to disclose these plans is surprising to say the least. This omission deprived the SEQR Lead Agency (the Common Council), the Town of Oneonta, other involved or interested agencies, and the public of meaningful participation in the scoping process. It is not the number of days of public comment which concerns us, but the lack of substantive notice of the actual breadth of the proposed development. We believe this is an error caused by the applicant which should be corrected through a new or supplemental scoping process.
344	10/18/2018	Ostego 2000, Inc.	You have said that the City intends to address the newly disclosed plans through a draft GEIS. This will be a daunting task. First, you will be required to consider the safety of the public at large. As you may know, there have been at least 6 major CNG truck incidents in Otsego County alone during the last 18 months. Notably, the intersection where the CNG trucks enter the Town of Oneonta will need to be carefully studied as it has previously been identified as one of the most dangerous intersections in the town. Among other serious safety concerns, the gas plant and CNG truck entrance will be located very near the "Heritage at The Plains" senior living community, a dangerous proposition that residents and staff will be exposed to day and night for potentially decades to come.
345	10/18/2018	Ostego 2000, Inc.	Further, there can be no doubt that the expected environmental impacts of the proposed plans will be significant, including impacts to the character of the community, impacts to human health, both upstream and downstream impacts, and climate impacts. Nor can review of the proposed gas infrastructure to serve both the Railyards and Pony Farm Industrial Park be considered separately. The project described in the CFA does not reflect a "separate action" as suggested in your letter. Instead, COIDA described its plans as a single interrelated project, spanning at least two counties, including anticipated expansion of the DeRuyter pipeline to be constructed specifically to bring increased gas supply to the Railyards and Pony Farm. Review of such proposals may not legally be segmented.
346	10/18/2018	Ostego 2000, Inc.	We emphasize that as part of the preparation of a draft GEIS, the Common Council will also be required to address both mitigation and alternatives to the proposed plans. We strongly believe that regional planning for energy needs should take place before projects such as those now being advanced are considered. The foreseeable impacts of emissions, traffic accidents, potential explosions, construction, pipeline expansions, and fracking to extract the gas in the first place, across multiple counties and locations, point to the urgent need for mitigation that can only be achieved through the "no action" alternative, or effective regional planning. This is apparent at inception.
347	10/18/2018	Ostego 2000, Inc.	We urge you to join the County, Chamber, and concerned residents in pursuing a meaningful regional plan for sustainable energy development which will provide for the safety and future of the entire community and significantly reduce our impact on climate. We remain hopeful and are committed to working with you to that end.
348	3/5/2019	Rachel Soper	How is it possible that the Otsego County IDA, the purpose of which is to "advance the job opportunities and economic welfare of the people of New York". has not conducted an economic analysis for a project of this scale? The entire stated goal for the project simmers down to economic growth .... and yet this DGEIS rests on the assumption that after huge amounts resources are spent for the expansion of utilities such as sewer, water, electric and gas; road installation and maintenance, fire service, wetland and soil impacts ... that the city of Oneonta is going to come out on top; in a better fiscal position with many more jobs. This is a very risky assumption and one that should not be made.

349	3/5/2019	Rachel Soper	If you look at the Otsego County IOA's data, you'll see they have 11 projects worth roughly \$85 million. The estimated jobs to be created were 162. The -"Estimated Net job Change" (which means the actual jobs created) was 29. SO 162 vs 29; that's less than 1 /5th of the jobs the Otsego County IDA said they would create. The "Net tax Exemptions Per Job Gained" was \$42,943.00. So roughly \$43,000 in tax breaks for every job created. The "Expenses Per Job Gained" was \$33,483. To put this into perspective, take a look at the other seven Southern Tier IDA's, The estimated jobs totaled 11,474 and the jobs created were 11,238 ... so as a whole they came very close to reaching 100% of the jobs promised .... they produced 98 of every 100 jobs promised where as Otsego County IDA produced 20 of every 100 jobs promised. Further, every county individually produce many more jobs compared to Otsego County. The lowest job producer was Delaware county-they created 154 jobs (more than they estimated) and yet they still produced more than five times the jobs compared to Otsego County at 29 jobs.
350	3/5/2019	Rachel Soper	But here's what's really incredible: The seven County IDAs combined gave .. Net tax Exemptions Per Job Gained" of \$14,512 whereas Otsego County IDA gave \$43,000 alone. So seven counties combined gave 1/3 of the tax breaks per job compared to Otsego County. The average tax exemption per job by the seven counties was \$2,073(the highest exemption was given by Broome county at \$5,098) compared to Otsego County at \$43,000 per job.
351	3/5/2019	Rachel Soper	"Expenses Per Job Gained" was a similar story. The seven County IDA's combined spent \$13,628, whereas the Otsego County IDA spent \$33,483 alone. Seven counties combined spent roughly two and a half times ~ compared to Otsego County alone. And each of the seven counties, individually, produced many more jobs than Otsego County. The lowest job producer was Delaware County at 154 jobs (33 more than they had estimated) compared to Otsego County producing only 29.
352	3/5/2019	Rachel Soper	Based on the Otsego County IDA's dismal track record, I'm requesting that the city council ( as lead agency, as representatives of the taxpayers of this city, and as being solely responsible for the Final GEIS-no matter who prepares it) insist on a full economic analysis of the Railyard Redevelopment Project (all 200 acres)which breaks down "the costs, who will bear those costs, the basis for projected job creation, and justification on how the site will actually be filled. I also request that a new Draft GEIS be issued after addressing this issue and the many other flaws and omissions in the current document. I additionally request that a "no action alternative" be included in the DGEIS as required by SEQR (DEC handbook)
353	3/17/2019	Keith Schue, Technical Advisor to Otsego 2000	The intent of a GEIS is to provide a credible analysis of build-out scenarios and identify a "preferred alternative" that takes into account site constraints. As mentioned in my prior oral comments to the City, the preferred alternative identified in the draft GEIS (option #3) would directly impact onsite wetlands and the 100-ft wetland buffer zone. Furthermore, that preferred alternative is not supported by analysis to demonstrate that an effective stormwater management system can be designed within the space available. These concerns are buttressed by professional comments submitted by Dr. Donna Vogler, Ph.D., who is a wetlands delineation specialist. (It should also be noted that although Delaware Engineering performed a preliminary wetlands assessment, which it called a "delineation", an actual field delineation to determine wetland boundaries inside of the NYS freshwater wetlands checkzone has not been confirmed by a state or federal agency.)
354	3/17/2019	Keith Schue, Technical Advisor to Otsego 2000	The attached two pictures cast further doubt upon the validity of the alternative analysis performed. Both are aerial photograph from Google-Maps taken at the same scale. (Note 500ft reference in the corner of each.) The top picture is an image of the Railyards site, along with an image of the 900,000 sq ft preferred alternative and its five buildings superimposed (option #3). The bottom picture is an image of the Chobani Yogurt production facility in South Edmeston, New York. <a href="https://www.syracuse.com/news/2011/07/how_rural_chenango_county_beca.html">https://www.syracuse.com/news/2011/07/how_rural_chenango_county_beca.html</a>



355	3/17/2019	Keith Schue, Technical Advisor to Otsego 2000	As seen in the photograph and described in the article above, Chobani's large warehouse is approximately 160,000 sq ft. From this, it is apparent that the total area occupied by buildings and industrial equipment on Chobani's property is about 300,000 sq ft. This is smaller in size than the 400,000 sq ft building shown in the preferred alternative for the Railyards. (400,000 sq ft is approximately 9 acres or about the size of 7 football fields.)
356	3/17/2019	Keith Schue, Technical Advisor to Otsego 2000	Significantly, however, the area required by Chobani for trucks, employee parking for various shifts, and other ancillary purposes is considerably greater than depicted for operations of the 400,000 sq ft building in the draft GEIS. These real-world features are not reflected in the preferred alternative. In fact, almost no space is provided for them. Even if it is assumed that some materials may be received by rail, it is not reasonable to assume that all materials, as well as shipped products would enter and leave the site this way. In fact, it appears that the entire Chobani facility, including parking, would just barely fit within developable confines of the entire Railyards site.
357	3/17/2019	Keith Schue, Technical Advisor to Otsego 2000	Relating to this, Chobani probably uses no more than the amount of energy allocated for the 400,000 sq ft building in the draft GEIS, casting doubt on both the 7.7MW of electricity and the 40,000 MBTUs of gas which the draft GEIS assumes are needed for the railyard buildout.
358	3/17/2019	Keith Schue, Technical Advisor to Otsego 2000	With a more realistic evaluation of space requirements and potential uses (including nonindustrial uses), I believe the City can justifiably conclude that maximum building area and energy needs for the Railyards are substantially less than identified in the draft GEIS. Moreover, by revising the "preferred alternative" to reduce square footage and energy allocation for development, the City would be able protect on-site wetlands and buffers, provide effective stormwater management, and attain sustainable energy goals, consistent with the concept of an Ecopark. In my opinion, this would significantly help in bringing development of the Railyards in line with reality and addressing public concerns. I respectfully encourage the City to give this suggestion serious consideration.
359	3/18/2019	Karl Seeley	There are some significant positive features to this GEIS.  First, there is repeated mention of facilities for adding value to locally produced foods. This activity is an important component of reviving the local agricultural economy, and such a revival becomes more plausible as climate change hurts areas that currently profit from efficiencies of scale, while benefiting places with reliable, abundant water, such as upstate New York.
360	3/18/2019	Karl Seeley	Second, the discussion of alternative energies in section 9 provides a good overview of ways of powering the redeveloped site with the smallest possible environmental impact.
361	3/18/2019	Karl Seeley	However, I have two major concerns. First, the report fails to actually make a case for disturbing the wetlands on the site. Quoting from the document: The wetlands on the Study Area are listed as Class 1. Class 1 wetlands provide the most critical of the State's wetland benefits, reduction of which is acceptable only in the most unusual of circumstances; "A permit shall be issued only if it is determined that the proposed activity satisfies a compelling economic or social need that clearly and substantially outweighs the loss of or detriment to the benefits of the Class 1 wetland". (p. 43) The report justifies the preferred option (one with large wetland impacts) in terms of economies of scale in developing the site: Redevelopment of the site must balance the need for return on investment in terms of the scale of construction with the impacts to wetlands that may accompany site improvements. The Preferred Master Plan is informed by this needed balance." (p. 101) In other words, the people drawing up the GEIS have concluded that the "return on investment in terms of the scale of construction" justifies impinging upon Class 1 wetlands. Given the uncertainty of finding a client for the amount of space envisioned in the preferred option, it would be important to see further clarification of the return on investment—not neglecting the proposed wetlands restoration work—as a necessary first step toward seeing if it meets the test of being a "compelling economic or social need."

362	3/18/2019	Karl Seeley	<p>The second major concern has to do with climate impacts. In section 9, in amongst discussion of geothermal, electricity, solar hot water, and biomass, there's a subsection on compressed natural gas (CNG). If redevelopment of the rail yards ends up depending on a CNG facility, then we're talking about a significant increase in the region's combustion of methane, and that increase should be quantified and valued.</p> <p>A plausible lower bound for the social cost of carbon is about \$40 per ton.<sup>1</sup> In October, 2017, the US Environmental Protection Agency dropped its estimate of the social price of carbon from \$42 per ton to something in the range of \$1 to \$6 per ton. The key methodological change that enabled this drastic reduction was to stop considering the <i>global</i> impacts of emissions from the U.S. and instead consider only impacts felt within the U.S.<sup>2</sup> The absurdity of this approach can be seen by remembering that, not only do emissions from the U.S. affect other countries, but emissions from other countries affect the U.S. If every country counts the damages of its emissions only within its own borders, you quickly find "optimal" levels of carbon emissions that are, in aggregate, catastrophic.</p> <p>And the \$40 cost estimate in place at the end of the Obama administration may itself be a serious underestimate. It is based on the assumption that climate change will cause damage but not lead to slower economic growth. When that questionable assumption is relaxed—when we consider the ways that climate change is in fact likely to reduce economic growth—the estimated cost rises to as much as \$220 per ton.<sup>3</sup></p> <p>The revised GEIS should quantify the increase in methane consumption plausibly envisioned under different scenarios and calculate the social cost of the resulting CO<sub>2</sub> emissions using both the EPA 2016 prices and the higher prices based on taking into account the impacts on national economic growth. Also note that the EPA in 2016 estimated rising social cost of carbon in later years, so the cost estimate using the old EPA price should take that growth into account in summing this lower bound of the impact.</p> <p>CNG also comes with leakages of methane, as does the fracking process that is the most likely source of additional supplies of methane. While methane isn't resident in the atmosphere as long as carbon, it is a much more potent greenhouse gas in the short term, which matters tremendously as we likely approach tipping points of positive-feedback loops. Incremental leakage associated with increased methane combustion from CNG should be quantified and priced.</p> <p>Lastly, as is well known, last October the Intergovernmental Panel on Climate Change (IPCC) issued a finding that, limiting global warming to 1.5°C would require "rapid and far-reaching" transitions in land, energy, industry, buildings, transport, and cities. Global net human-caused emissions of carbon dioxide (CO<sub>2</sub>) would need to fall by about 45 percent from 2010 levels by 2030, reading 'net zero' around 2050.<sup>4</sup></p> <p>As for the value of keeping warming to only 1.5°C:</p> <p>The report highlights a number of climate change impacts that could be avoided by limiting global warming to 1.5°C compared to 2°C, or more. For instance, by 2100, global sea level rise would be 10 cm lower with global warming of 1.5°C compared with 2°C. The likelihood of an Arctic Ocean free of sea ice in summer would be once per century with global warming of 1.5°C, compared with at least once per decade with 2°C. Coral reefs would decline by 70-90 percent with global warming of 1.5°C, whereas virtually all (&gt; 99 percent) would be lost with 2°C.</p> <p>"Every extra bit of warming matters, especially since warming of 1.5°C or higher increases the risk associated with long-lasting or irreversible changes, such as the loss of some ecosystems," said Hans-Otto Pörtner, Co-Chair of IPCC Working Group II. [ibid.]</p>
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			<p>Otsego County is a small place, but the whole world is made up of small places, and if every small place argues, "Well, we're so small we don't matter," the aggregate effect is massive.</p> <p>Lastly, as is well known, last October the Intergovernmental Panel on Climate Change (IPCC) issued a finding that, limiting global warming to 1.5°C would require "rapid and far-reaching" transitions in land, energy, industry, buildings, transport, and cities. Global net human-caused</p> <p>The IPCC report points to the need to start putting the pieces in place <i>now</i> to get onto a path of declining CO2 emissions as soon as possible. If we undertake an <i>expansion</i> of the region's capacity to burn methane, we are delaying that transition, directing valuable investment funds toward something that, from a global perspective, is undesirable.</p> <p>1 United States Environmental Protection Agency, "The social cost of carbon: estimating the benefits of reducing greenhouse gas emissions", at <a href="https://19january2017snapshot.epa.gov/climatechange/social-cost-carbon_.html">https://19january2017snapshot.epa.gov/climatechange/social-cost-carbon_.html</a>.</p> <p>2 Chris Mooney, "New EPA document reveals sharply lower estimate of the cost of climate change," <i>Washington Post</i>, October 11, 2017, <a href="https://www.washingtonpost.com/news/energy-environment/wp/2017/10/11/new-epa-document-reveals-sharply-lower-estimate-of-the-cost-of-climate-change/?utm_term=.4e3f5f456b02">https://www.washingtonpost.com/news/energy-environment/wp/2017/10/11/new-epa-document-reveals-sharply-lower-estimate-of-the-cost-of-climate-change/?utm_term=.4e3f5f456b02</a></p> <p>3 See, e.g., Ker Than, "Estimated social cost of climate change not accurate, Stanford scientists say," <i>Stanford News</i>, January 12, 2015, at <a href="https://news.stanford.edu/2015/01/12/emissions-social-costs-011215/">https://news.stanford.edu/2015/01/12/emissions-social-costs-011215/</a></p>
363	3/18/2019	Karl Seeley	In the revised GEIS, the section on CNG should explain how the project plans to reconcile increased methane-burning capacity with a path of reduced CO2 emissions.
364	3/18/2019	Michael Forster Rothbart	<p>Proposed Trails for the Oneonta Railyards — March 2019</p> <p>This is excerpted from a longer document proposing 21 public trails across the City and Town of Oneonta. That proposal is expected to be released in April 2019.</p> <p><b>INTRODUCTION</b></p> <p>Oneonta has a triple set of barriers—Interstate 88, the Susquehanna River and the railroad tracks—that divide the city into inaccessible pockets. Fortunately, these linear barriers can also prove to be a resource for trail construction, since in many cases there is room for a trail corridor paralleling these barriers.</p> <p>In designing future uses for the Oneonta Railyard it will be important to consider ways for people to access the site by means other than driving. It is also important to think of the adjacent neighborhoods and how they can be connected via the rail yard.</p> <p><b>TRAIL TYPES</b></p> <p>We envision three types of trails, suitable for a variety of purposes:</p> <ul style="list-style-type: none"> <li>• <b>Main corridor multi-use trails:</b> These wide trails are primarily meant as transportation routes.</li> <li>• <b>Recreational multi-use trails:</b> These trails are similar in design to commuter corridor trails, except that they are primarily meant for outdoor recreation.</li> </ul>

• **Recreational natural trails:** These narrow trails are mostly in natural areas, including hills, parks, and beside rivers and wetlands. They are suitable for hiking, trail running, cross-country skiing, snowshoeing and mountain biking. They are routed to provide users with access to scenic locations rather than the most direct path.

#### PROPOSED TRAILS

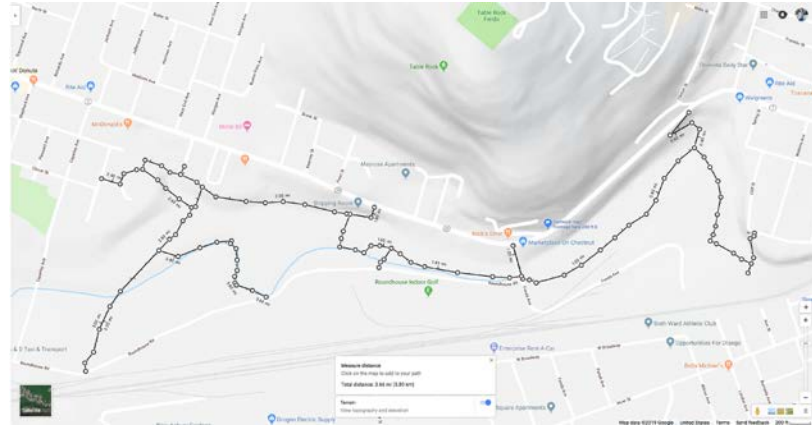
**Railyard Trail:** 3.5 mile primary multi-use trail from Railroad Ave. to Oneida St., paralleling the railroad ROW or Roundhouse Rd., ideally with connections across the tracks at Fonda Ave. and Lower River St., and at both ends (at Neawha Park and Hwy 205).



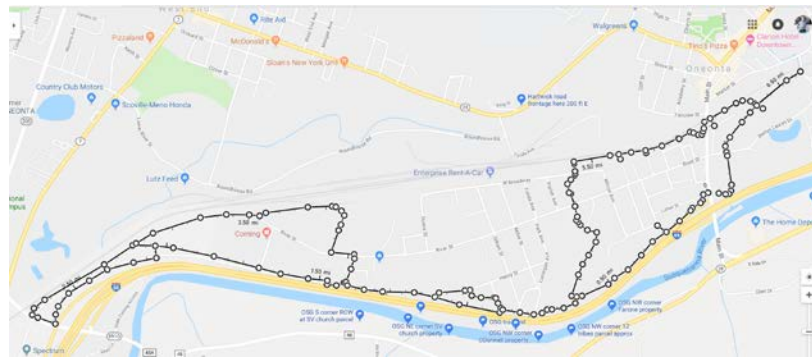
**Railyard Trail: Alternate route.** 2.8 mile primary multi-use trail from Railroad Ave. to Oneida St., routed via Lower River St. This variation stays closer to the railroad tracks right of way, and connects to Oneida St. via a streetside path beside Lower River St.



**Roundhouse Creek Nature Trail:** 3.6 miles of hiking trails along Roundhouse Creek from Cliff St. to Elmwood Ave., with a main 1.7 mile trail through a future Roundhouse Park, and 1.9 miles of side trails with connections to the parallel Railyard multi-use trail and 4 access points to Chestnut St., at Clinton St., Fonda Ave., American Legion and Shaffer Ave. This trail can connect across Chestnut St. to the Table Rock/Homer Folks trail system on land owned by Hartwick College and the State of New York.



River Street Neighborhood trail network: 2.7 mile primary multi-use trail from Main St. to Hwy. 205, along the north side of I-88, with an additional 2.1 miles of neighborhood loops connecting Neawha Park, Riverside Elementary, Swart-Wilcox House, Doc Knapp field, Boys & Girls Club and the Railyard. Two pedestrian bridges at Fonda Ave. and Lower River St. would provide important neighborhood connections. Alternate west end route possible along I-88.



This document is excerpted from the draft of a full Oneonta trail proposal, written by Michael Forster Rothbart with input from the Oneonta Susquehanna Greenway Committee. The full Oneonta trails proposal is expected to be released in April 2019. Detailed maps of all 21 proposed trails are available at <http://bit.ly/otsego-trails>. For further information, contact [mfrphoto@gmail.com](mailto:mfrphoto@gmail.com).

**ATTACHMENT B**

Phase II Environmental Site Assessment Report

2006

USEPA Brownfield Assessment Program

City of Oneonta

USEPA BROWNFIELDS ASSESSMENT PROGRAM

# PHASE II ENVIRONMENTAL SITE ASSESSMENT REPORT

FORMER D&H RAIL YARD AREA  
ONEONTA RIVER CORPORATION PROPERTY  
ONEONTA, NEW YORK

Prepared by:

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## TABLE OF CONTENTS

	<b>Page</b>
1.0 INTRODUCTION .....	1-1
2.0 SITE DESCRIPTION AND BACKGROUND .....	2-1
2.1 Site Location and Description .....	2-1
2.1.1 Former Roundhouse Area .....	2-2
2.1.2 Coaling Tower Area .....	2-2
2.1.3 Former Barrett Property Area .....	2-3
2.1.4 Former City Impound Lot Area .....	2-4
2.1.5 Former Cinder Pits Area .....	2-4
2.1.6 Fill Areas .....	2-5
2.1.7 Off-site Areas .....	2-5
2.2 Geology/Hydrogeology .....	2-6
2.3 Site History .....	2-6
3.0 SITE INVESTIGATION .....	3-1
3.1 Site Survey .....	3-1
3.2 Sediment Sampling .....	3-1
3.3 Subsurface Soil Sampling .....	3-2
3.3.1 Soil Borings .....	3-2
3.3.2 Soil Sample Collection .....	3-2
3.4 Surface Soil Sampling .....	3-3
3.5 Groundwater Sampling .....	3-3
3.5.1 Monitoring Well Installation .....	3-4
3.5.2 Monitoring Well Development .....	3-4
3.5.3 Groundwater Sampling .....	3-4
4.0 DATA VALIDATION .....	4-1
4.1 Data Validation .....	4-1
5.0 NATURE AND EXTENT OF CONTAMINANTS .....	5-1
5.1 Field Observations .....	5-1
5.2 Laboratory Results .....	5-2
5.2.1 Soil .....	5-2
5.2.1.1 VOCs .....	5-2
5.2.1.2 SVOCs .....	5-2
5.2.1.3 Metals .....	5-4
5.2.1.4 PCBs .....	5-5



## TABLE OF CONTENTS (Continued)

		<b>Page</b>
5.2.2	Sediment.....	5-6
5.2.2.1	SVOCs .....	5-6
5.2.2.2	Metals.....	5-6
5.2.3	Groundwater.....	5-7
5.2.3.1	VOCs.....	5-7
5.2.3.2	SVOCs .....	5-8
5.2.3.3	Metals.....	5-8
6.0	CONCLUSIONS AND RECOMMENDATIONS.....	6-1
6.1	Conclusions.....	6-1
6.1.1	Groundwater.....	6-1
6.1.2	Soil .....	6-1
6.2	Recommendations.....	6-2
7.0	REFERENCES.....	7-1

## LIST OF FIGURES

<b>Figure No.</b>	<b>Description</b>	<b>Following Page</b>
2-1	Site Location.....	2-1
2-2	Site Map.....	2-1
2-3	Potentiometric Contour Map .....	2-6
3-1	Sampling Locations .....	3-2

## LIST OF TABLES

<b>Table No.</b>	<b>Description</b>	<b>Following Page</b>
2-1	Groundwater Elevation Data .....	2-6
5-1	Summary of Soil Boring Sampling Results (VOCs).....	5-2
5-2	Summary of Soil Boring Sampling Results (SVOCs).....	5-2

## TABLE OF CONTENTS (Continued)

**LIST OF TABLES (Continued)**

<b>Table No.</b>	<b>Description</b>	<b>Following Page</b>
5-3	Summary of Surface Soil Sampling Results (SVOCs).....	5-2
5-4	Summary of Soil Boring Sampling Results (Metals).....	5-2
5-5	Summary of Surface Soil Sampling Results (Metals).....	5-2
5-6	Summary of Surface Soil Sampling Results (PCBs).....	5-2
5-7	Summary of Sediment Sampling Results (SVOCs).....	5-2
5-8	Summary of Sediment Sampling Results (Metals).....	5-2
5-9	Summary of Groundwater Sampling Results (VOCs and SVOCs).....	5-2
5-10	Summary of Groundwater Sampling Results (Metals).....	5-2

## **1.0 INTRODUCTION**

The City of Oneonta, New York (City) has received a grant under the United States Environmental Protection Agency's (USEPA) Brownfields Assessment Program to support economic development in the City through the identification, assessment, cleanup, and redevelopment of Brownfields properties. This Phase II Environmental Site Assessment (ESA) summarizes the results of a site investigation at the three adjoining properties that comprise the Oneonta River Corporation property (site) in the City of Oneonta, New York. The objective of the Phase II ESA was to provide an assessment of environmental conditions at the site.

This Phase II ESA will be submitted to the USEPA. A Phase I ESA for the site was previously submitted in June 2005 (Malcolm Pirnie, 2005).

## 2.0 SITE DESCRIPTION AND BACKGROUND

### 2.1 SITE LOCATION AND DESCRIPTION

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The Oneonta River Corporation (ORC) property, located in the western portion of the City of Oneonta, consists of three adjoining properties with an approximate total land area of 94 acres. Figure 2-1 identifies the extent and location of the area assessed during the Phase II ESA and Figure 2-2 identifies the properties included in the assessment. The site, which is located on a portion of the former Delaware and Hudson (D&H) rail yard, is bordered by Chestnut Street to the north, Canadian Pacific Railway (CPR) railroad tracks to the south, Fonda Avenue to the east, and Ceperly Avenue to the west. The site is bisected by Roundhouse Road which passes approximately east-west through the site from Fonda Avenue to Ceperly Avenue. North of Roundhouse Road, the site is mainly wetlands and wooded areas. A vacant parking lot is present in the eastern part of the site. In the western portion of the site, there is a large clearing where excavation activities appear to have been conducted in the past. A small man-made ditch, which provides drainage from wetlands on and to the east of the site, parallels Roundhouse Road in the eastern portion of the site. To the west, the ditch borders the excavated area before it is joined by a second ditch which begins near the southern border of the site near Roundhouse Road. After the junction, the ditch drains to the west and exits the site near Cobleskill Stone Products.

A portion of the site to the south of Roundhouse Road has been developed for commercial business. Three active businesses (O'Connor and Shew Construction, Sett-R-Rite, and Willow Creek Specialists) are located in this area of the site. Two businesses adjacent to the former roundhouse, GC Castings and Crop Production Services, operate on parcels that are completely surrounded by the site. The areas of the site surrounding these businesses consist primarily of vacant land vegetated with grasses and small shrubs.

Several concrete structures of the former D&H rail yard are still present on the site. The largest structure, formerly used to load coal and sand into rail cars, is approximately 80 feet tall. A smoke stack, nearly 160 feet tall, is still standing on the site. Fill material, construction debris piles, drum carcasses, and trash are present in various places. The largest

debris pile is located in the area of the former roundhouse and appears to be composed of demolition debris from the roundhouse, in addition to other construction debris.

Based on the information presented in the Phase I ESA (Malcolm Pirnie, 2005), the following areas were investigated during the Phase II ESA on the ORC property (Figure 2-2).

### **2.1.1 Former Roundhouse Area**

The former roundhouse is located east of the coaling tower and south of Roundhouse Road along the southern property boundary. The D&H operated the roundhouse from 1906 to 1954, when portions of the structure were torn down. The remaining portions of the roundhouse were used for storage, including telephone poles, until 1994 when the remainder of the structure was demolished. The concrete foundation for the roundhouse is still present. Many open-ended pipes are located in the vicinity of the former roundhouse foundation. An open concrete pit measuring approximately six feet by eight feet by six feet deep is located northwest of the roundhouse and contained open-ended pipes and electrical wires. A large smoke stack, approximately 160 feet tall, is on the location of the former heating plant for the D&H rail yard operations.

As discussed in the Phase I ESA (Malcolm Pirnie, 2005), oil was stored in drums and barrels in the southeast portion of the former roundhouse. A machine shop and coal storage, presumably for the heating plant, were also located in this area. Electrical transformers and a blacksmith shop were located south of the roundhouse. A cistern was located to the southeast of the roundhouse in the vicinity of the heating plant. Diesel fuel was stored to the east and to the southeast of the roundhouse. At the time of the investigation, the area of the former roundhouse was covered by approximately one acre of construction debris including concrete and re-bar, asphalt road materials, culvert pipes, an unlabeled steel drum, and a refrigerator.

### **2.1.2 Coaling Tower Area**

An area that contains several concrete structures and debris is located between the three current metal buildings located south of Roundhouse Road in the western portion of the ORC property and the former roundhouse. The dominant structure in this area is the

remnants of a former coaling tower that is approximately 80 feet tall. Based on previous maps and the 1993 Environmental Site Assessment conducted for the ORC (H2M Group, 1993), a sand dryer and a coal trestle were located in the vicinity of the coaling tower. The coaling tower was also used to sift sand for off-site uses and a 1964 New York State Department of Transportation (DOT) map showed that sand was stockpiled adjacent to the sand dryer. Three additional concrete structures consisting of two buildings and an aboveground storage tank (AST) cradle are located near the coaling tower. The purpose and contents of the former AST are unknown. The buildings are essentially empty except for miscellaneous trash. One of the buildings, located due north of the coaling tower, contained a steel drum with no visible label. A cement block building northeast of the coaling tower has pipes which exit the ground and enter the site of the building. Several vintage air conditioning units, one labeled 1978, were discarded to the east of the coaling tower.

### **2.1.3 Former Barrett Property Area**

Barrett Division-Allied Chemical Corp. operated an asphalt plant in the western portion of the site until 1986. The asphalt plant was located west of the Former Cinder Pits Area and sand and gravel excavation area. Aerial photographs of the Barrett property and asphalt plant identified an AST and indicated that liquid asphalt was likely stockpiled in the eastern portion of the Barrett property along with other unidentified materials. Seven buildings were identified on the property on a 1964 DOT map.

A dense tar-like substance was noted during the installation of a temporary monitoring well (TW-8) in the vicinity of the former asphalt plant in the 1993 Environmental Site Assessment Report (H2M Group, 1993). Groundwater samples collected from TW-8 contained arsenic and zinc at concentrations greater than the respective NYS Standards. Total petroleum hydrocarbons (TPH) were also reported in groundwater samples from this well. These wells were installed in a test pit which was backfilled.

None of the buildings or asphalt processing equipment remains at the site. At the time of the investigation, debris and trash, including car batteries, pipes, rusted drum carcasses, and fill material were found in the area of the former asphalt plant. This area also contains several concrete foundations. One of the foundations, located about 40 feet south of the site's property line on CPR property, has open-ended vertical pipes entering through the

concrete slab. Another foundation, which according to City personnel is from the former City recycling facility, straddles the site/CPR property boundary. The rest of the Former Barrett Property Area was covered with grass, brush, and small trees as well as debris and fill material. There are multiple debris piles adjacent to the man-made ditch downstream of the culvert that passes under Roundhouse Road. Open-ended sections of pipes, drum carcasses, and an old furnace were noted among the debris.

#### **2.1.4 Former City Impound Lot Area**

The former City impound lot is located north of Roundhouse Road, in the northeast portion of the site. The lot appears to have been constructed on fill material of unknown origin. The driveway that provides access to the former impound lot is blocked by a pile of fill material. The former lot is currently paved with asphalt and is fenced and gated. A building located in the vicinity of the former impound yard labeled “torpedo magazine” on a rail yard map was assumed to be used as a storage facility for small pyrotechnic flare devices formerly used on railroads for emergency communications. The building no longer exists. Multiple rusted 55-gallon steel drum carcasses with no visible labels were identified south and west of the former City impound yard in the wooded area and in the man-made ditch. One of these drums contained a gray soil or ash material.

#### **2.1.5 Former Cinder Pits Area**

North of Roundhouse Road, in the western portion of the site, is an area of approximately three acres that appears to have been excavated for sand and gravel. The eastern portion of this area is part of the Former Cinder Pits area, which is bounded by the man-made ditch in the north and east directions. In this area, multiple piles of fill and demolition debris including rusted 55-gallon drum carcasses, trees, construction demolition debris, fill material, appliances, and one cardboard drum carcass were present. No labels were visible on the cardboard drum. A storage trailer with unknown contents was parked on this portion of the site at the time of the investigation.

#### **2.1.6 Fill Areas**

Two fill areas were identified for further investigation during the Phase II ESA. One fill area is located north of Roundhouse Road near the western extent of the site. This area consists of a small wooded area and wetlands. Fill material was present along the southern edge of this area where the property borders Roundhouse Road. A concrete foundation was also noted in this location. A sanitary sewer pump station is located adjacent to this fill area, near the southwest border of the site by the intersection of Roundhouse Road and Ceperly Avenue. The pump station appears to be located in a well caisson which was mounded with soil. The other fill area of concern is located east of the former roundhouse and south of Roundhouse Road along the eastern property boundary. This fill area is vacant with multiple fill and debris piles consisting of gravel, concrete construction debris, asphalt, brick, and steel pipes.

#### **2.1.7 Off-site Areas**

There are two former dry cleaning businesses located upgradient of the site, one former dress factory located on the corner of Fonda Road and Chestnut Street, and a suspected AST / underground storage tank (UST) located west of the ORC property. Based on information obtained during the Phase I ESA (Malcolm Pirnie, 2005), one of the former dry-cleaning businesses was located adjacent to the northern border of the site, but is currently occupied by a hair salon. The other former dry-cleaning business was located near the northwest corner of the site on Shaffer Avenue, just south off of Chestnut Street. The former dress factory processed mica for use in electronic capacitors during World War II and once contained a dry-cleaning facility. The former factory is located upgradient of the wetland area that is located east of the site. This wetland drains through the man-made ditch that traverses the site. Stockpiles of unknown material and what appeared to be two 10,000 gallon storage tanks, possibly USTs, were noted to the west of the site. The current and former contents and condition of the storage vessels are unknown.

## **2.2 GEOLOGY/HYDROGEOLOGY**

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Laurens Formation shale, siltstones, and sandstones are present beneath the site and in a majority of the surrounding area (Fisher et al., 1970). The depth to bedrock beneath the site is not known. Natural near surface materials in a majority of the site are characterized as lacustrine sand associated with large bodies of water (Caldwell et al., 1986). These deposits are generally well sorted and stratified with a variable thickness of seven to 66 feet. The northwest portion of the site is characterized as outwash sand and gravel associated with proglacial fluvial deposition. These deposits are typically coarse to fine gravel with sand, well rounded and stratified with thicknesses ranging from seven to 66 feet. Materials encountered during the Phase II ESA, in borings between 8 and 50 feet in depth, generally include 1-5 feet of dark brown fine to medium sands overlaying 1-4 feet of brown fine sand and silt, with increasing gravel in the formations below. Bedrock was not encountered during the Phase II ESA. Soil boring logs are included in Appendix A.

Topography at the site is relatively flat with the exception of an outwash terrace which roughly parallels the northern border of the site. Groundwater levels measured during the site investigation and the corresponding groundwater elevations are presented on Table 2-1. As shown in Table 2-1, the depth to groundwater at the site generally ranged from six to 12 feet below ground surface (bgs). One exception is a groundwater level that was measured in a well located at the top of the outwash terrace located near the northern border of the site. The depth to water in this well was approximately 41 feet bgs. A potentiometric map is presented on Figure 2-3. As shown on Figure 2-3, the direction of groundwater flow in the northern part of the site is generally to the south and follows the topography. In the remainder of the site where the topography is relatively flat, the direction of groundwater flow is generally southwest toward the Susquehanna River, which is the regional groundwater discharge.

## **2.3 SITE HISTORY**

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Historical records for the site were reviewed as far back as 1910. Sanborn<sup>®</sup> Fire Insurance Maps were provided for the immediate roundhouse area and showed that from 1910 to 1971 the roundhouse area did not change in structure, except in 1916 when an

additional railroad track was laid down. In these maps, most of the railroad tracks entered the southeast section of the roundhouse and connected to the room labeled “coal.” There were several rooms, including the room labeled “coal”, attached to the southeast portion of the roundhouse. The heating plant was located in this area of the roundhouse. Two areas labeled “Oil barrels” and “Oil tanks” were located southeast of the roundhouse. An office building, sand dryer, and coal trestle were located west of the roundhouse, while two elevated tanks were located southwest of the roundhouse. A building labeled “BL. SM. Shop” was assumed to be a blacksmith shop located south of the roundhouse.

A review of historical aerial photographs, topographic maps, and various additional maps provided by the City of Oneonta provide additional information for the entire site. In 1943, the construction of the eastern portion of Roundhouse Road, Ceperly Avenue, and all the streets that intersect Chestnut Street to the south between Oneida Street and Fonda Avenue had been completed and in use. The roundhouse and railroad tracks were active with many railroad cars on the D&H property and on tracks south of the property. Between 1918 and 1943, additional railroad tracks were added to the south and west of the roundhouse and the presence of wetlands was indicated.

A building labeled “Torpedo Magazine” was first noted in 1944 on the Right of Way and Track Map (1929), with revisions dated 1921-1945. This building was located northeast of the roundhouse and as noted previously was most likely used to store small pyrotechnic devices (torpedoes) that were used to signal train engineers. Directly east of the roundhouse, five buildings, one labeled “shavings,” two diesel fuel storage tanks, and one pump house were indicated while two boiler rooms were indicated southwest of the roundhouse. A garage and “toilet” building were also noted in the vicinity of the current Opportunities for Otsego, Inc. (OFO) building located east of the site. Indication of additional fuel facilities being installed southeast of the roundhouse were shown in 1950. The Barrett Division-Allied Chemical Corp. property, which included seven buildings, was first noted in 1953 and was active at this time. The D&H operated the roundhouse until 1954, when approximately 75 percent of the roundhouse structure was torn down. The remaining portions of the roundhouse were used for storage.

## **3.0 SITE INVESTIGATION**

The site investigation was conducted in accordance with the USEPA–approved Work Plan, dated September 2005 (Malcolm Pirnie, Inc., 2004), and included site surveying, sediment sampling and analysis, surface soil sampling and analysis, soil borings, subsurface soil sampling and analysis, and groundwater sampling and analysis. A New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP) and NYSDEC Analytical Services Protocol (ASP)-approved analytical laboratory analyzed all samples collected during the investigation. ASP Category B data packages were produced for each sample. A Data Usability Summary Report (DUSR) was prepared upon the receipt of all analytical data to ensure that the quality of the data was sufficient to evaluate remedial alternatives.

### **3.1 SITE SURVEY**

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Upon completion of the field investigation activities, the location and elevation of each new groundwater monitoring well was surveyed by Malcolm Pirnie to the nearest 0.01-foot vertically and nearest 0.1 foot horizontally using the existing datum and was added to the existing AutoCAD base map. The locations of the sediment, surface soil, and subsurface soil samples were surveyed to the nearest 0.1-foot horizontally and added to the existing AutoCAD base map.

### **3.2 SEDIMENT SAMPLING**

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Sediment samples were collected from eight locations from the man-made drainage ditch and from a stream located in the northwest area of the site. Sediment samples were collected where the ditch and stream enter and exit the ORC property and in areas in the vicinity of areas of concern. Figure 3-1 identifies the eight sampling locations.

Sampling and sample handling procedures were conducted in accordance with the Quality Assurance Project Plan (QAPP). The sediment samples were analyzed for Target Compound List (TCL) semi-volatile organic compounds (SVOCs), and Target Analyte List

(TAL) metals. The location of each sample was noted on a site map and marked with a wooden stake for subsequent surveying. Descriptions of the sediment were recorded during sampling.

### **3.3 SUBSURFACE SOIL SAMPLING**

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Subsurface soil samples were collected from 19 locations distributed across the site to address areas of concern identified during the Phase I ESA (Malcolm Pirnie, 2005). Figure 3-1 identifies these locations. All subsurface soil boring and sample collection and handling activities were conducted in accordance with the QAPP.

#### **3.3.1 Soil Borings**

Nineteen soil borings were drilled to evaluate the areas of concern on the site and along property boundaries, including those of which border off-site areas of concern (Figure 2-2). Due to the presence of fill materials throughout the site, soil borings were drilled using a truck-mounted rotary drilling rig equipped with 4.25-inch hollow-stem augers. Soil samples were collected continuously from the ground surface to the final depth of each boring using two-inch diameter split spoon samplers. Upon retrieval, each split spoon was opened and the soil was screened using a PID, visually inspected for indications of contamination (e.g., staining and/or sheens) and buried debris, and classified by the on-site field geologist. The soil boring logs are presented in Appendix A. The final depth of each boring was dependent on site specific conditions as outlined in Section 3.3.2. All drilling equipment was decontaminated by steam cleaning before use and between drilling locations.

#### **3.3.2 Soil Sample Collection**

One soil sample from each boring was collected from the unsaturated interval containing the highest photoionization detector (PID) measurement and/or the greatest evidence of contamination (e.g., staining, sheens, and/or odor). If no contamination was evident, only the depth interval immediately above the water table was collected for laboratory analysis. The borings that were not completed as groundwater monitoring wells were advanced to the water table. The borings that were completed as groundwater

monitoring wells were advanced to five to seven feet below the water table. Soil samples were analyzed for TCL volatile organic compounds (VOCs), SVOCs, and TAL metals.

Investigation-derived wastes were handled in accordance with the *NYSDEC Final Technical and Administrative Guidance Memorandum (TAGM) - Disposal of Drill Cuttings*. Soil cuttings that showed no evidence of contamination (i.e., greater than background PID measurements, odors, or staining) were returned to the boreholes that were not completed as groundwater monitoring wells. Soil cuttings from boreholes that were completed as groundwater monitoring wells and from boreholes that showed evidence of contamination were contained in U.N.-approved 55-gallon drums. The drums were labeled with their contents, date of accumulation, and staged in one area of the site until they were properly disposed off-site.

### **3.4 SURFACE SOIL SAMPLING**

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Surface soil samples were collected at 18 locations distributed across the site, nine of which were located adjacent to soil boring locations. Surface soil samples were collected from a depth not exceeding two inches below ground surface. Figure 3-1 identifies these locations. Sampling and sample handling procedures were conducted in accordance with the QAPP. Surface soil samples were analyzed for TCL SVOCs and TAL metals. The surface soil sample directly south of the former roundhouse, near the location of the former electrical transformers, was also analyzed for polychlorinated biphenyls (PCBs) by USEPA Method 8082. The location of each sample was marked with a wooden stake for subsequent surveying. Descriptions of the sampled soil and observations of the ground surface were recorded during sampling.

### **3.5 GROUNDWATER SAMPLING**

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Groundwater samples were collected from monitoring wells installed in 14 of the 19 soil borings. Figure 3-1 identifies the borings that were converted to monitoring wells. Monitoring well installation, development, and groundwater sampling were conducted in accordance with the QAPP.

### **3.5.1 Monitoring Well Installation**

Two-inch diameter PVC monitoring wells were installed in the eight-inch boreholes and were screened to intercept the water table. With the exception of MW-08, each well was constructed using 10 feet of 0.01-inch slot PVC well screen and designed so that a minimum of two feet of well screen was above the water table. Monitoring well MW-08 was constructed using 8 feet of 0.01 slot PVC well screen since the water table at this location was less than three feet bgs.

### **3.5.2 Monitoring Well Development**

Monitoring wells were developed in accordance with the QAPP upon completion to minimize turbidity in groundwater samples collected from each well and to improve their hydraulic properties. Water generated during well development was discharged on the ground surface adjacent to each well in accordance with NYSDEC guidelines. Purged groundwater was temporarily contained in pre-cleaned five-gallon buckets prior to discharge to evaluate whether sheens and/or non-aqueous phase liquids (NAPLs) were present in the purge water. Sheens and/or NAPLs were observed during well development for two of the wells and therefore purged water from these wells was collected in UN-approved 55-gallon steel drums and staged on-site for characterization and proper disposal.

### **3.5.3 Groundwater Sampling**

Groundwater samples were collected from each of the 14 monitoring wells a minimum of one week after well development was completed. The water level in each monitoring well was measured and recorded prior to groundwater purging and sampling. Groundwater sampling purge logs for each well are presented in Appendix B. Groundwater sampling was conducted in accordance with the USEPA Low-Flow/Low-Purge Sampling Protocol (USEPA, 1998). To the extent practicable, groundwater purging rates were low enough to prevent significant drawdown of the groundwater level in the well. Water levels were monitored during sampling to ensure that excessive draw down was not occurring. Each groundwater sample was analyzed for TCL VOCs, TCL SVOCs, and TAL metals. To evaluate geochemical characteristics of the groundwater, and to evaluate the effectiveness of

well purging, temperature, pH, oxidation-reduction potential, specific conductivity, turbidity, and dissolved oxygen were measured during purging and immediately prior to groundwater sampling. If groundwater turbidity was greater than 50 Nephelometric Turbidity Units (NTUs) at the time of sampling, both filtered and unfiltered samples were collected and analyzed for TAL metals. Sample field filtration procedures were conducted in accordance with the QAPP.

## 4.0 DATA VALIDATION

### 4.1 DATA VALIDATION

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In accordance with the Work Plan, data validation was performed for the samples collected during the Phase II ESA. The Data Usability Summary Report (DUSR) is contained in Appendix C. Fifty seven soil samples (including two field duplicates) were analyzed for TCL VOCs, TCL SVOCs, or TAL metals. One soil sample was also analyzed for PCBs. Fifteen aqueous samples (including one field duplicate) were analyzed for TCL VOCs, TCL SVOCs, and TAL metals. One aqueous sample was also analyzed for filtered metals. Blind field duplicate correlations were all within USEPA Region II validation guidelines. All data were classified as usable with some minor qualification, with the following exceptions:

- Due to recovery below 10% in the associated spiked control, bromomethane results for samples ORC-SB-03(4.5-5.5), ORC-SB-05(10-11), ORC-SB-06(1-2), ORC-SB-06(6.5-7.5), ORC-SB-07(5-6), ORC-SB-08(5-6), ORC-SB-10(1-2), ORC-SB-11(13-14), and ORC-SB-12(43-44) were rejected as sample components.
- Matrix spikes for sample ORC-SB-12(1-2) failed to recover for vinyl chloride. Sample results were rejected for this compound in the sample.
- Tentatively Identified Compounds (TICs) flagged “B” by the laboratory in all VOC samples were rejected due to presence in the associated blanks.
- Due to recoveries below 10% in sample ORC-SD-02, results were rejected for the following SVOCs in this sample: hexachlorocyclopentadiene, 4,6-dinitro-2-methylphenol, 2,4-dinitrophenol, and 3,3-dichlorobenzidine.
- Matrix spikes of sample ORC-MW-11 were less than 10% for 2,4-dimethylphenol. Results for this compound in all samples reported in Sample Delivery Group (SDG) E0677 were therefore rejected. The following samples are included in this SDG: ORC-FB-01, ORC-MW-6, and samples ORC-MW-08 through ORC-MW-14.
- Tentatively Identified Compounds (TICs) flagged “A” or “B” by the laboratory in all SVOC samples were rejected due to presence in the associated blanks.



- All results for sample ORC-SD-01 and samples ORC-SD-03 through ORC-SD-06 were qualified as estimated (UJ, J) due to high moisture content (60%-76%).

Further information regarding data validation is provided in the DUSR in Appendix C.

## 5.0 NATURE AND EXTENT OF CONTAMINANTS

### 5.1 FIELD OBSERVATIONS

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Site conditions including ground-cover, fill and debris pile locations, and building occupancies at the time of the Phase II ESA were consistent with observations noted during the Phase I ESA. Fill material generally consisting of sand, gravel, and concrete was still being placed near the western border of the site. At least one dump truck load of fill was placed in this area during the Phase II ESA.

Sediment samples collected during the Phase II ESA generally consisted of silt and fine sand with some clay. Some of the samples contained gravel; two of the samples contained coal fragments. The sediment in the ditch near sample collection point SD-07 (Figure 3-1) was significantly oxidized. The water in this ditch also contained indications of iron-fixing bacteria.

As shown in the soil boring logs in Appendix A, overburden materials observed in the soil cores were generally composed of fill material, commonly containing coal fragments, overlying layers of fine silty sand and fine to medium silty sand and gravel. Bedrock was not encountered during the site investigation. Several borings in the area of the former Barrett property located in the western area of the site (Figure 3-1) had indications of petroleum-related compounds. Soil borings in this area that showed evidence of petroleum-related compounds were as follows:

- SB-14,
- SB-16,
- SB-17, and
- SB-18.

A PID measurement of 30 parts per million (ppm) was noted at approximately 7 feet bgs in samples collected from boring ORC-SB-14, located in the northern vicinity of former Barrett property area. PID measurements ranging from 5 ppm to 10.7 ppm were noted in the other above-mentioned soil samples collected from this area. Groundwater samples collected from this area (ORC-MW-12 and ORC-MW-14) did not exhibit any indications of petroleum-related compounds.

Samples collected from soil boring ORC-SB-7, which is located in the vicinity of the cooling tower near the suspected former AST, contained indications of petroleum-related compounds. The PID measurement in samples collected from ORC-SB-7 was 23 ppm at approximately 11 feet bgs. The groundwater sample from ORC-MW-6, which was installed at ORC-SB-07, contained nominal evidence of petroleum-related compounds. There were no indications of petroleum-related compounds in any of the other soil borings advanced during the investigation.

## **5.2 LABORATORY RESULTS**

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Laboratory results for soil, sediment, and groundwater samples collected during the investigation are summarized in Tables 5-1 through 5-6 (soil samples), Table 5-7 and 5-8 (sediment samples) and Table 5-9 and 5-10 (groundwater samples). Analytical laboratory reporting forms for samples collected during the Phase II ESA are provided in Appendix D.

### **5.2.1 Soil**

Tables 5-1 through 5-6 summarize the analytical results for soil samples collected at the site during the Phase II ESA. The applicable Draft New York Title 6, Official Compilation of Codes, Rules, and Regulations (6NYCRR), Part 375 Commercial soil cleanup objectives (SCOs) and NYSDEC Technical and Administrative Guidance Memorandum (TAGM) 4046 SCOs are listed in Tables 5-1 and 5-6 for comparison.

#### **5.2.1.1 VOCs**

As shown in Table 5-1, none of the soil boring samples collected during the Phase II ESA contained VOCs at concentrations that exceeded the Draft 6NYCRR Part 375 Commercial SCOs or NYSDEC TAGM 4046 SCOs.

#### **5.2.1.2 SVOCs**

As shown in Table 5-2, only two soil boring samples contained SVOCs at concentrations that exceeded the applicable Draft 6NYCRR Part 375 Commercial SCOs. Soil boring sample ORC-SB-03(4.5-5.5) contained benzo(a)pyrene (1,200 micograms per

kilogram (ug/kg)) at a concentration greater than the corresponding 6NYCRR Part 375 Commercial SCO of 1,000 ug/kg. This sample also contained benzo(a)anthracene, benzo(b)fluoranthene, chrysen, and dibenzo(a,h)anthracene at concentrations that exceeded the corresponding NYSDEC TAGM 4046 SCOs. The second sample that contained SVOCs greater than the 6NYCRR Part 375 Commercial SCOs was ORC-SB-15(3-4). This sample contained benzo(a)pyrene (2,600 ug/kg) and dibenzo(a,h)anthracene (800 ug/kg) at concentrations greater than the corresponding Draft 6NYCRR Part 375 Commercial SCOs of 1,000 ug/kg and 560 ug/kg, respectfully. This sample also contained benzo(a)anthracene (3,000 ug/kg), benzo(b)fluoranthene (3,300 ug/kg), and chrysene (3,800 ug/kg) at concentrations that exceeded the corresponding NYSDEC TAGM 4046 SCOs.

The benzo(a)pyrene results exceeded the NYSDEC TAGM 4046 SCOs in the samples from ORC-SB-04(1-2), ORC-SB-5(10-11), ORC-SB-6(1-2), ORC-SB-8(0.5-1.5), ORC-SB-14(7-8), ORC-SB-17(1-2), and ORC-SB-19(6-7). Several of these samples (ORC-SB-8(0.5-1.5), ORC-SB-14(7-8), and ORC-SB-17(1-2)) also contained chrysene at concentrations greater than the corresponding NYSDEC TAGM 4046 SCO. In addition, the sample from ORC-SB-8(0.5-1.5) contained dibenzo(a,h)anthracene and the sample from ORC-SB-19(6-7) contained benzo(a)anthracene at concentrations greater than the equivalent NYSDEC TAGM 4046 SCOs.

As shown in Table 5-3, only two surface soil samples contained SVOCs at concentrations greater than the applicable Draft 6NYCRR Part 375 Commercial SCOs. The samples from ORC-SS-03 and ORC-SS-07 contained benzo(a)pyrene (2,200 ug/kg and 2,600 ug/kg, respectfully) at concentrations that exceed the corresponding 6NYCRR Part 375 Commercial SCO of 1,000 ug/kg. These samples also contained benzo(a)anthracene, benzo(b)fluoranthene, and chrysene at concentrations that exceeded the corresponding NYSDEC TAGM 4046 SCOs. In addition, the dibenzo(a,h)anthracene result in the sample from ORC-SS-07 was greater than the applicable NYSDEC TAGM 4046 SCO.

Benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, chrysene, and dibenzo(a,h)anthracene results in the sample from ORC-SS-01 were greater than the corresponding NYSDEC TAGM 4046 SCOs. With the exception of dibenzo(a,h)anthracene, the concentrations in sample ORC-SS-04 exceeded NYSDEC TAGM 4046 SCOs for the same poly aromatic hydrocarbons (PAHs) indicated above. The samples from ORC-SS-02,

ORC-SS-09, ORC-SS-11, and ORC-SS-14 contained benzo(a)anthracene, benzo(a)pyrene, chrysene, and dibenzo(a,h)anthracene at concentrations greater than the equivalent NYSDEC TAGM 4046 SCOs. The concentrations of benzo(a)anthracene, benzo(a)pyrene, and dibenzo(a,h)anthracene were greater than the corresponding NYSDEC TAGM 4046 SCOs in the samples from ORC-SS-08 and ORC-SS-10. The concentrations of benzo(b)pyrene in the samples from ORC-SS-06 and ORC-SS-18 were also greater than the NYSDEC TAGM 4046 SCO for this compound. Six of the 19 surface soil samples collected during the Phase II ESA did not contain any SVOCs at concentrations exceeding the Draft 6NYCRR Part 375 Commercial SCOs NYSDEC TAGM 4046 SCOs.

### **5.2.1.3 Metals**

As shown in Table 5-4, sample results from ORC-SB-6(1-2) (20.3 mg/kg), ORC-SB-07(5-6) (33.5 mg/kg) and (10.5-11.5) (19.5 mg/kg), ORC-SB-08(0.5-1.5) (148 mg/kg) , ORC-SB-15(3-4) (24.2 mg/kg), and ORC-SB-16(1-2) (18.9 mg/kg) were greater than the corresponding 6NYCRR Part 375 Commercial SCO of 16 mg/kg. Lead was also detected in the sample from ORC-SB-15(3-4) (1,220 mg/kg) at a concentration greater than the applicable Draft 6NYCRR Part 375 Commercial SCO of 1,000 mg/kg. These were the only Draft 6NYCRR Part 375 Commercial SCO exceedances for metals in soil boring samples collected during the Phase II ESA.

Table 5-4 shows that all of the 29 soil boring samples collected during the Phase II ESA contain at least one metal at concentrations greater than the corresponding NYSDEC TAGM 4046 SCOs. As shown in Table 5-4, all of the soil boring samples contain concentrations of iron greater than the equivalent NYSDEC TAGM 4046 SCO of 2,000 mg/kg. The iron results ranged from 2,200 mg/kg in the sample from ORC-SB-14(7-8) to 67,900 mg/kg in the sample from ORC-SB-15(3-4). With the exception of the Draft 6NYCRR Part 375 Commercial SCOs exceedances listed above, arsenic concentrations in 11 samples exceeded the NYSDEC TAGM 4046 SCOs. Twenty five of the 29 soil boring samples contained beryllium and/or zinc results greater than the corresponding NYSDEC TAGM 4046 SCOs. Nickel concentrations exceeded the NYSDEC TAGM 4046 SCO in 21 samples. Twenty samples contained chromium greater than the respective NYSDEC TAGM 4046 SCO of 10 mg/kg. The chromium concentrations in these samples ranged from 11.4

mg/kg in the sample from ORC-SB-09(2-3) to 34.1 mg/kg in the sample from ORC-SB-15(3-4). Copper was detected in nine of the subsurface soil samples and three samples contained selenium at concentrations greater than the respective NYSDEC TAGM 4046 SCO. Mercury was also detected in three samples at concentrations greater than the corresponding NYSDEC TAGM 4040 SCO of 0.1 mg/kg. The greatest mercury result (0.25 mg/kg) was reported in the sample from ORC-SB-04(1-2). Only one sample (ORC-SB-15(3-4)) contained a cadmium concentration (2.0 mg/kg) greater than the NSDEC TAGM 4046 SCO of 1 mg/kg.

Table 5-5 shows that five of the 19 surface soil samples collected during the Phase II ESA contained arsenic concentrations greater than the respective Draft 6NYCRR Part 375 Commercial SCO of 16 mg/kg. The arsenic concentrations ranged from 16.8 mg/kg in the sample from ORC-SS-X (blind duplicate of sample ORC-SS-06) to 38.9 mg/kg in the sample from ORC-SS-11. These were the only surface soil samples that contained metals concentrations greater than the corresponding Draft 6NYCRR Part 375 Commercial SCOs.

As shown in Table 5-5, arsenic, beryllium, chromium, copper, iron, and zinc were detected in all of the surface soil samples at concentrations greater than the applicable NYSDEC TAGM 4046 SCOs. Nickel was detected in 14 samples and selenium was detected in nine samples at concentrations exceeding their respective NYSDEC TAGM 4046 SCOs. Mercury concentrations were greater than the respective NYSDEC TAGM 4046 SCO of 0.1 mg/kg in the samples from ORC-SS-01 (0.11 mg/kg), ORC-SS-04 (0.17 mg/kg), and ORC-SS-14 (0.20 mg/kg). Three samples contained cadmium at concentrations greater than the NYSDEC TAGM 4046 SCO of 1.0 mg/kg. The greatest cadmium result was reported in the sample from ORC-SS-04 (4.2 mg/kg).

#### **5.2.1.4 PCBs**

Only one sample collected during the Phase II ESA was analyzed for PCBs. As shown in Table 5-6, no PCBs were detected in surface soil sample ORC-SS-01.

### **5.2.2 Sediment**

Tables 5-7 and 5-8 summarize the analytical results for sediment samples collected at the site during the Phase II ESA. The applicable Draft 6NYCRR Part 375 Commercial SCOs and NYSDEC TAGM 4046 SCOs are listed in Tables 5-7 and 5-8 for comparison.

#### **5.2.2.1 SVOCs**

Table 5-7 shows that five of the eight sediment samples collected during the Phase II ESA contain benzo(a)pyrene at concentrations greater than the applicable Draft 6NYCRR Part 375 Commercial SCO of 1,000 ug/kg. The benzo(a)pyrene exceedances in these samples ranged from 1,400 ug/kg in the sample from ORC-SD-08 to 2,600 ug/kg in the sample from ORC-SD-03. These were the only samples that contained SVOCs at concentrations greater than the respective Draft 6NYCRR Part 375 Commercial SCOs.

As shown in Table 5-7, benzo(a)pyrene was detected in two sediment samples (excluding the above-mentioned samples) at concentrations greater than the corresponding NYSDEC TAGM 4046 SCO. Benzo(a)anthracene and chrysene were present in six of the eight sediment samples at concentrations greater than the corresponding NYSDEC TAGM 4046 SCOs. Five of these sediment samples also contained benzo(b)fluorethene concentrations greater than the respective NYSDEC TAGM 4046 SCO. Of these samples, four contained dibenzo(a,h)anthracene at concentrations which also exceeded the NYSDEC TAGM 4046 SCO. Only one of the samples contained benzo(k)fluoranthene at a concentration greater than the respective NYSDEC TAGM 4046 SCO.

#### **5.2.2.2 Metals**

As shown in Table 5-8, three sediment samples collected during the Phase II ESA contained metals at concentrations greater than the corresponding Draft 6NYCRR Part 375 Commercial SCOs. Arsenic results in samples ORC-SD-01 (16.3 mg/kg), ORC-SD-03 (18.0 mg/kg), and ORC-SD-04 (34.1 mg/kg) exceeded the Draft 6NYCRR Part 375 Commercial SCO of 16 mg/kg. The sample from ORC-SD-03, from the former impound lot, also contained copper (692 mg/kg) and lead (6,850 mg/kg) at concentrations greater than the corresponding Draft 6NYCRR Part 375 SCOs of 270 mg/kg and 1,000 mg/kg, respectively. These were the only sediment samples that contained metals at concentrations greater than the equivalent Draft 6NYCRR Part 375 SCOs.

All of the sediment samples contained concentrations of beryllium, chromium, iron, nickel, selenium, and zinc that exceeded the applicable NYSDEC TAGM 4046 SCOs. With the exception of the exceedances listed above, arsenic was detected in two sediment samples and copper was detected in five sediment samples at concentrations greater than the corresponding NYSDEC TAGM 4046 SCOs. Mercury results exceeded the NYSDEC TAGM 4046 SCO of 0.1 mg/kg in five of the eight sediment samples collected during the Phase II ESA. The concentrations of mercury ranged from 0.16 mg/kg in the sample from ORC-SD-05 to 0.30 mg/kg in the sample from ORC-SD-03. Three of these samples also contained cadmium at concentrations greater than the applicable NYSDEC TAGM 4046 SCO.

### **5.2.3 Groundwater**

Analytical results for groundwater samples collected at the site during the Phase II ESA are summarized in Table 5-9 (VOCs and SVOCs) and Table 5-10 (metals). The applicable NYSDEC Class GA Standards for groundwater are also listed in Tables 5-9 and 5-10 for comparison.

#### **5.2.3.1 VOCs**

Table 5-9 shows that only two of the 14 groundwater sampling locations contained groundwater sample concentrations of VOCs greater than the corresponding NYSDEC Class GA Standards. As shown in Table 5-9, the sample from ORC-MW-03 contained methyl tert-butyl ethylene (MTBE) (12 micrograms per liter [ug/l]) at a concentration that exceeded the NYSDEC Class GA Standard of 10 ug/l. The concentrations of 1,2,4,trimethylbenzene (7 ug/l) and isopropylbenzene (6 ug/l) in the sample from ORC-MW-06 were greater than the corresponding NYSDEC Class GA Standard for these compounds of 5 ug/l. These were the only groundwater samples that contained VOCs that exceeded NYSDEC Class GA Standards.



### **5.2.3.2 SVOCs**

As shown in Table 5-9, the sample from ORC-MW-06 was the only sample that contained SVOCs at a concentration greater than the applicable NYSDEC Class GA Standards. Naphthalene was detected in this sample at a concentration of 17 ug/l which exceeds the corresponding NYSDEC Class GA Standard of 10 ug/l.

### **5.2.3.3 Metals**

Table 5-10 shows that calcium was detected in all of the groundwater samples at concentrations greater than the corresponding NYSDEC Class GA Standard of 50 ug/l. Calcium concentrations ranged from 6,130 ug/l in the sample from ORC-MW-08 to 74,500 ug/l in the sample from ORC-MW-12. As shown in Table 5-10, no other metals were detected at concentrations exceeding the applicable NYSDEC Class GA Standards.

## **6.0 CONCLUSIONS AND RECOMMENDATIONS**

### **6.1 CONCLUSIONS**

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#### **6.1.1 Groundwater**

Based on field observations made during the Phase II site investigation and the analytical results for samples collected from the site, compounds of potential concern were generally only detected in groundwater. Only two petroleum compounds (1,2,4-trimethylbenzene and isopropylbenzene) are present in groundwater in the vicinity of the former AST near the former cooling tower at concentrations slightly greater than the corresponding NYSDEC Class GA Standards. One groundwater sample contained MTBE, a common gasoline additive, at a concentration slightly greater than the corresponding NYSDEC Class GA Standard. This sample was collected in the vicinity of the former City impound yard. Only one of the 14 groundwater samples collected from the site contained SVOCs at a concentration greater than the applicable NYSDEC Class GA Standards. The sample contained naphthalene and was collected near the former AST near the former cooling tower.

None of the groundwater samples collected from monitoring wells installed adjacent to off-site Areas of Concern contained VOCs, SVOCs, or metals at concentrations greater than the applicable NYSDEC Class GA Standards.

#### **6.1.2 Soil**

Although soil and sediment samples contained several SVOCs at concentrations greater than the applicable NYSDEC TAGM 4046 SCOs, only two collected during the Phase II ESA contained SVOCs at concentrations greater than the corresponding Draft 6NYCRR Part 375 Commercial SCOs. Five of the samples with SVOC exceedances were sediment samples. Two of these samples were collected off-site, adjacent to the north and east boundaries where water flows into the site. One of these samples was collected at the western boundary of the site from a stream flowing into the site. This shows that SVOCs are

also present at concentrations greater than Draft 6NYCRR Part 375 SCOs in upstream areas adjacent to the site.

Arsenic was the most common metal that was detected in sediment and soil samples greater than the Draft 6NYCRR Part 375 Commercial SCO. One soil boring sample and one sediment sample also contained lead at concentrations greater than the corresponding Draft 6NYCRR Part 375 Commercial SCO. The soil boring sample was collected from a depth of 3-4 feet bgs in the vicinity of the former Barrett property. A surface soil sample and a deeper sub-surface soil sample collected at the same location did not contain lead at concentrations greater than the respective 6NYCRR Part 375 Commercial SCO or NYSDEC TAGM 4046 SCO. The sediment sample was collected near the former impound yard area. In addition to lead, this sample also contained copper and arsenic at concentrations greater than the Draft 6NYCRR Part 375 Commercial SCOs. Calcium was the only metal in groundwater samples to exceed NYSDEC Class GA Standards.

None of the soil samples collected at the site contained concentrations of VOCs greater than the corresponding Draft 6NYCRR Part 375 or NYSDEC TAGM SCOs. PCBs were not detected in the surface soil sample collected near the former transformers located adjacent to the former roundhouse.

## **6.2 RECOMMENDATIONS**

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Although several sediment, surface soil, and subsurface soil samples collected at the Oneonta River Corporation site contained SVOCs and metals at concentrations greater than the respective Draft 6NYCRR Part 375 Commercial SCOs, certain analytes (benzo(a)pyrene and arsenic) were also present in samples collected at off-site locations. Therefore, these exceedances may represent typical background concentrations for these analytes. Lead concentrations were greater than the 6NYCRR Part 375 Commercial SCO in only one sediment sample and one subsurface soil sample. Lead concentrations in sediment samples collected upstream and downstream of this sediment sample were less than the 6NYCRR Part 375 SCO. The subsurface soil sample containing the lead exceedance was obtained

from a depth greater than three feet bgs. Since none of the other surface soil or subsurface soil samples contained lead at concentrations greater than the corresponding 6NYCRR Part 375 Commercial SCO, it is expected that casual contact or any human or ecological exposure pathways to this analyte would be limited.

Petroleum-related compounds were detected in only two groundwater samples at concentrations greater than the respective NYSDEC Class GA Standards. Only three VOCs were detected in samples at concentrations slightly exceeding the NYSDEC Class GA Standards.

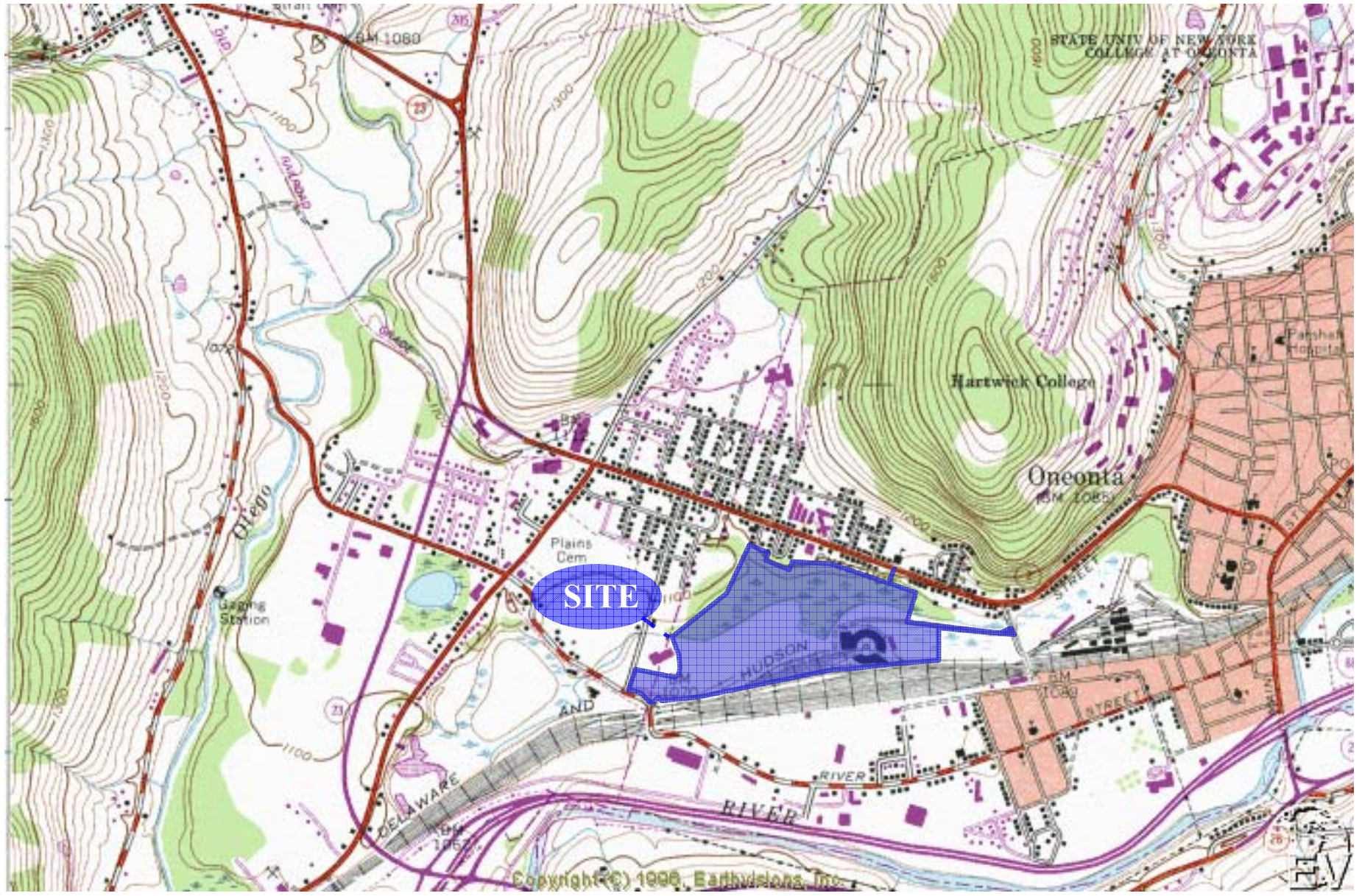
Soil and groundwater samples collected to evaluate off-site AOCs did not contain VOCs, SVOCs, or metals (with the exception of calcium in groundwater) at concentrations greater than the applicable 6NYCRR Part 375 SCOs or NYSEDC Class GA Standards.

Based on the results of the Phase II ESA, the magnitude and distribution of analytes which exceed either the corresponding NYSDEC TAGM 4046 SCOs, Draft 6NYCRR Part 375 Commercial SCOs, or NYSDEC Class GA Standards, further investigation or remedial activities do not appear to be warranted at the site. It is therefore recommended that the wells installed during the Phase II ESA at the Oneonta River Corporation Properties be properly abandoned.

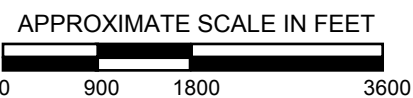
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- New York State Department of Environmental Conservation (NYSDEC), 2005, Draft 6 NYCRR Part 375 Environmental Remediation Program.
- New York State Department of Environmental Conservation (NYSDEC), 1994, Technical and Administrative Guidance Memorandum: Determination of Soil Cleanup Objectives and Cleanup Levels.
- United States Environmental Protection Agency (USEPA), Region II, 1998, Ground Water Sampling Procedure, Low Stress (Low Flow) Purging and Sampling Standard Operating Procedure.





SOURCE: 7.5 MINUTE TOPOGRAPHIC MAP  
ONEONTA QUADRANGLE, NEW YORK  
UNITED STATES GEOLOGIC SURVEY 1988



USEPA Brownfields Assessment Program  
City of Oneonta, New York

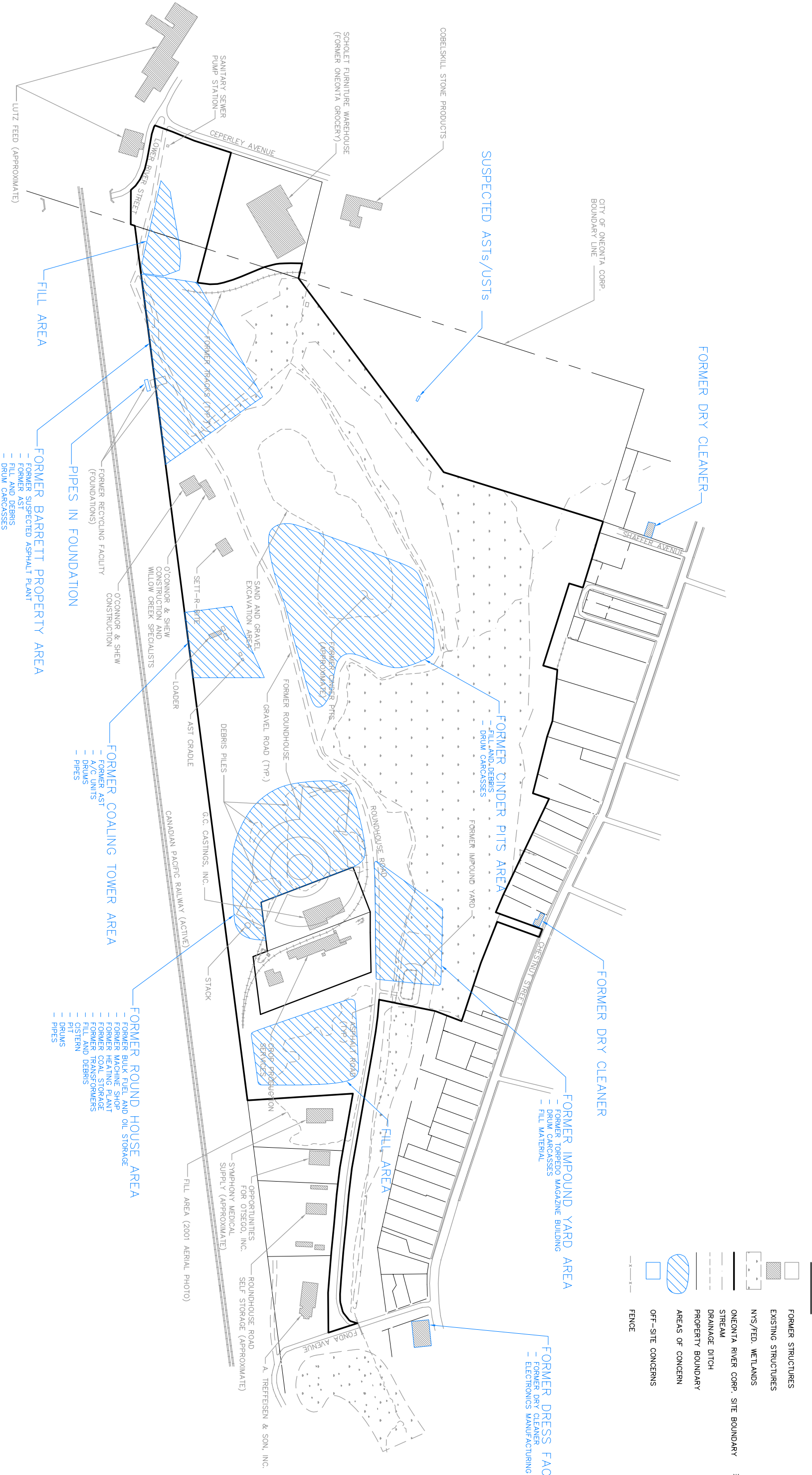
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### SITE LOCATION

FIGURE 2-1





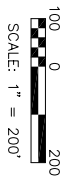
**FORMER BARRETTI PROPERTY AREA**  
 - FORMER SUSPECTED ASPHALT PLANT  
 - FORMER AST  
 - FILL AND DEBRIS  
 - DRUM CARCASSES

**FORMER COALING TOWER AREA**  
 - FORMER AST  
 - A/C UNITS  
 - DRUMS  
 - PIPES

**FORMER ROUND HOUSE AREA**  
 - FORMER BULK FUEL AND OIL STORAGE  
 - FORMER MACHINE SHOP  
 - FORMER HEATING PLANT  
 - FORMER COAL STORAGE  
 - FORMER TRANSFORMERS  
 - FILL AND DEBRIS  
 - GISTERN  
 - DRUMS  
 - PIPES

**FORMER CINDER PITS AREA**  
 - FILL AND DEBRIS  
 - DRUM CARCASSES

**FORMER DRESS FACTORY**  
 - FORMER DRY CLEANER  
 - ELECTRONICS MANUFACTURING



**LEGEND**

- FORMER STRUCTURES
- EXISTING STRUCTURES
- NYS/FED. WETLANDS
- ONEONTA RIVER CORP. SITE BOUNDARY
- STREAM
- DRAINAGE DITCH
- PROPERTY BOUNDARY
- AREAS OF CONCERN
- OFF-SITE CONCERNS
- FENCE



REVISIONS		REMARKS	
NO.	BY	DATE	

DES	JRW
DMN	RNT
OOD	BRN

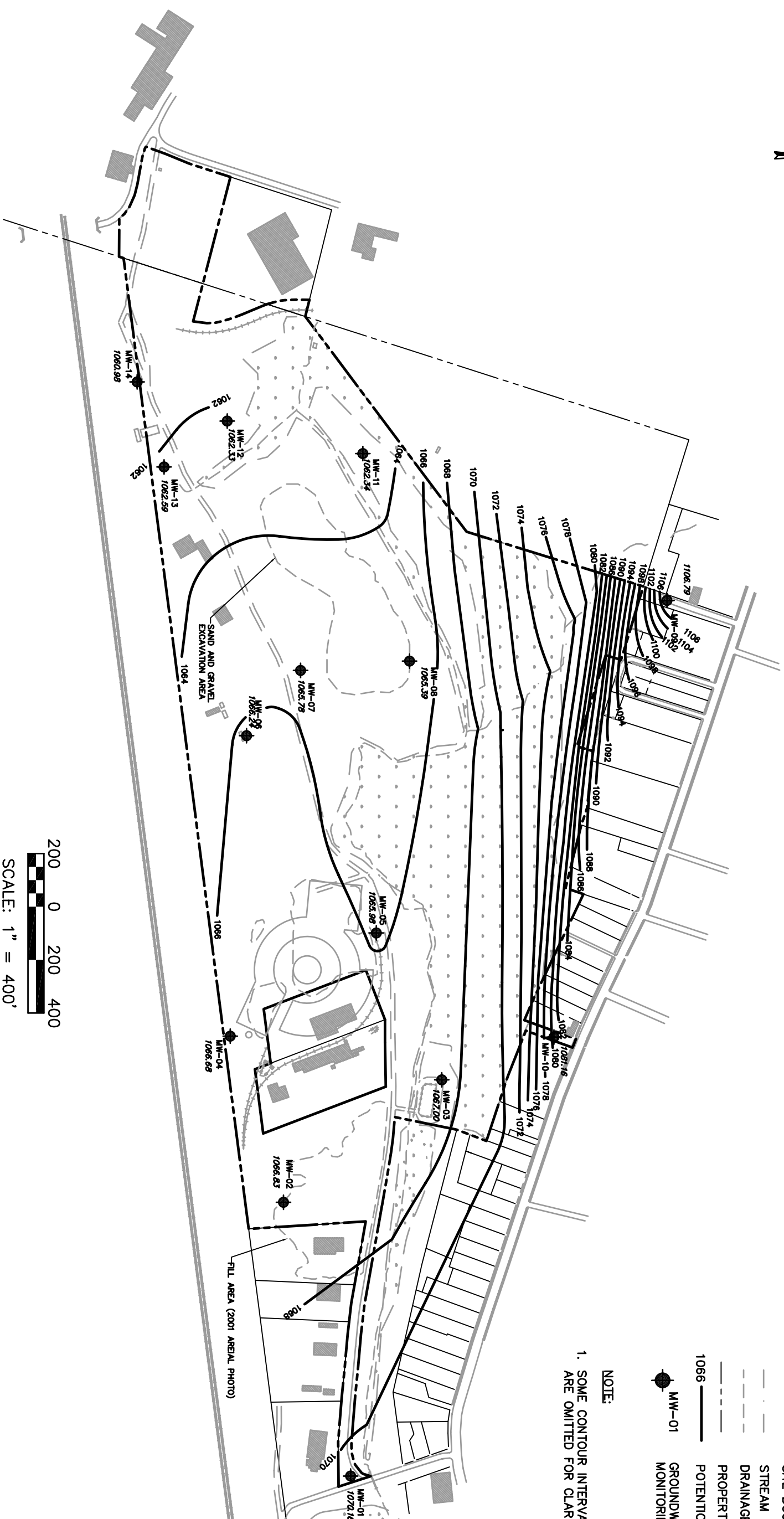
**USEPA BROWNFIELD ASSESSMENT PROGRAM**  
 CITY OF ONEONTA, NEW YORK

**SITE MAP**  
 SCALE: 1" = 200'

DATE: SEPTEMBER 2005  
 FIGURE 2-2

WARNING - IT IS A VIOLATION OF NEW YORK EDUCATION LAW SECTION 7209.2 FOR ANY PERSON, UNLESS HE IS ACTING AS AN EMPLOYEE OF THE STATE OF NEW YORK, TO REPRODUCE OR TRANSMIT IN ANY MANNER, OR TO ALTER THIS DOCUMENT IN ANY MANNER, WITHOUT THE WRITTEN PERMISSION OF MALCOLM PIRNIE & ASSOCIATES, INC. SECTION 7209.2, EDUCATION LAW, SECTION 7209.2.

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**LEGEND**

- FORMER STRUCTURES
- EXISTING STRUCTURES
- NYS/FED. WETLANDS
- ONEONTA RIVER CORP. SITE BOUNDARY
- STREAM
- DRAINAGE DITCH
- PROPERTY BOUNDARY
- POTENTIOMETRIC CONTOUR
- 1066 MW-01 GROUNDWATER MONITORING WELL

**NOTE:**  
1. SOME CONTOUR INTERVAL LABELS ARE OMITTED FOR CLARITY.



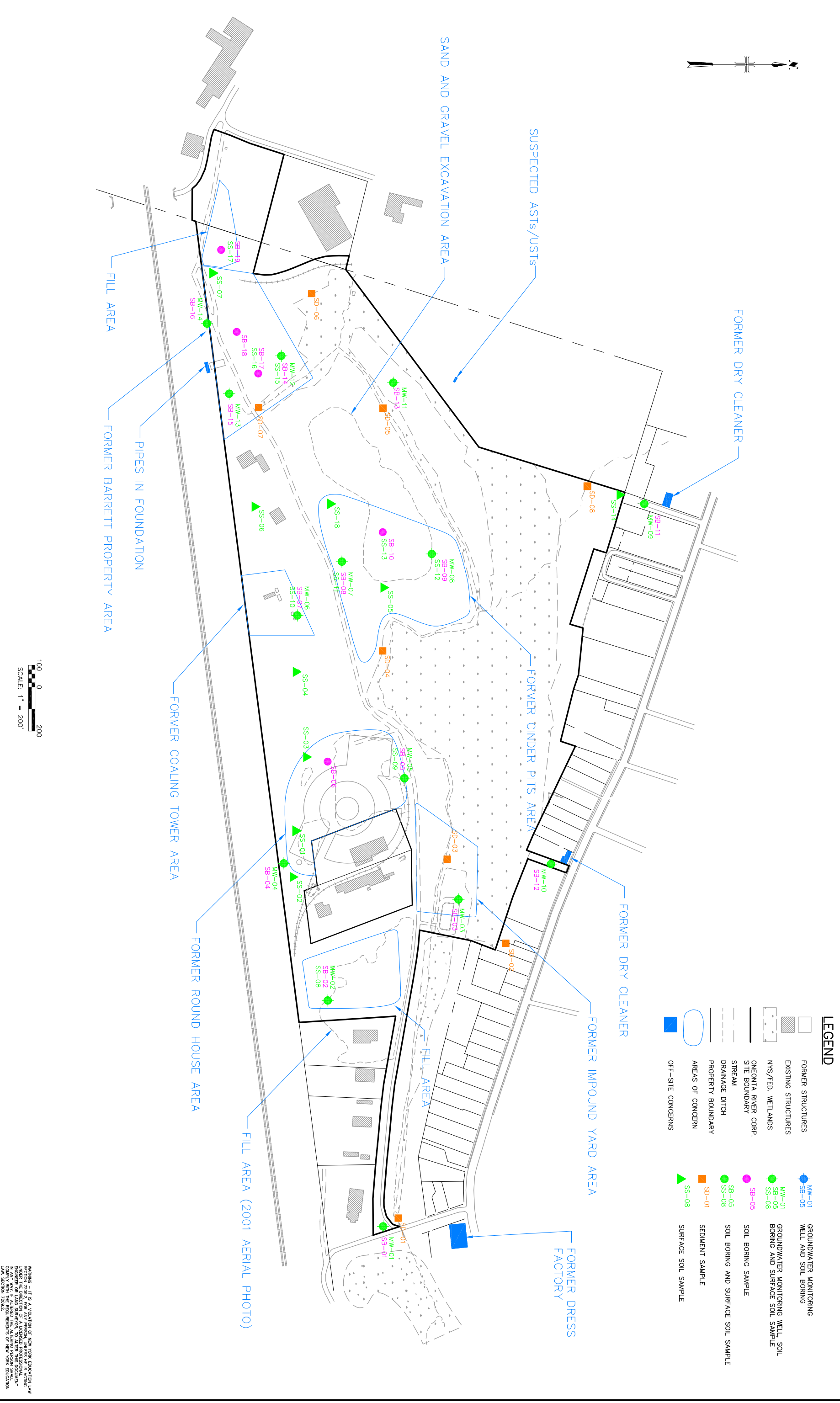


NO.	BY	DATE	REVISIONS	REMARKS

DES	JRW
DWN	MDM
CD	BRN

**USEPA BROWNFIELD ASSESSMENT PROGRAM**  
CITY OF ONEONTA, NEW YORK

**SAMPLING LOCATIONS**  
SCALE: 1" = 200'



**Table 2-1  
Groundwater Elevation Data  
USEPA Brownfields Assessment Program  
Phase II Environmental Site Assessment  
Former D Rail Yard, Oneonta River Corporation Properties  
Oneonta, New York**

<b>Well</b>	<b>Top of Casing Elevation (ft amsl)</b>	<b>Depth to Water 5/22 - 5/24/06 (ft)</b>	<b>Depth to LNAPL (ft)</b>	<b>Groundwater Elevation (ft amsl)</b>
MW-1	1076.67	6.51	-	1070.16
MW-2	1077.45	10.62	-	1066.83
MW-3	1074.34	7.34	-	1067.00
MW-4	1076.79	10.11	-	1066.68
MW-5	1075.90	9.92	-	1065.98
MW-6	1078.38	12.14	Sheen	1066.24
MW-7	1069.51	3.73	-	1065.78
MW-8	1071.59	6.20	-	1065.39
MW-9	1118.61	11.82	-	1106.79
MW-10	1122.46	41.30	-	1081.16
MW-11	1065.63	3.29	-	1062.34
MW-12	1070.45	8.12	-	1062.33
MW-13	1072.03	9.44	-	1062.59
MW-14	1070.45	9.47	Sheen	1060.98



Notes:

Amsl - above mean sea level

LNAPL - light non-aqueous phase liquid.

**Table 5-1**  
**Summary of Soil Boring Sampling Results (VOCs)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID Sampling Depth (feet bgs) Sampling Date Matrix Units	NYSDEC TAGM 4046 Soil Cleanup Objective ug/kg	6 NYCRR Part 375 Draft Commercial Soil Cleanup Objective ug/kg	ORC-SB-02 7.5-8.5 05-01-06 Soil ug/kg	ORC-SB-03 4.4-5.5 05-02-06 Soil ug/kg	ORC-SB-04 1-2 05-02-06 Soil ug/kg	ORC-SB-04 6-7 05-02-06 Soil ug/kg	ORC-SB-05 10-11 05-02-06 Soil ug/kg	ORC-SB-06 1-2 05-03-06 Soil ug/kg	ORC-SB-06 6.5-7.5 05-03-06 Soil ug/kg	ORC-SB-07 5-6 05-03-06 Soil ug/kg	ORC-SB-07 10.5-11.5 05-03-06 Soil ug/kg
1,1,2,2-Tetrachloroethane	600		6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
1,2,3-Trichlorobenzene			6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
1,2,3-Trichloropropane			6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
1,2,4-Trichlorobenzene	3400		6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
1,2,4-Trimethylbenzene	13000	190000	6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	100 J
1,2-Dibromo-3-chloropropane			6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
1,2-Dichlorobenzene	7900	500000	6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
1,3,5-Trimethylbenzene	3300	190000	6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
1,3-Dichlorobenzene	1600	280000	6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
1,4-Dichlorobenzene	8500	130000	6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
2-Butanone			6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
2-Chlorotoluene			6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
4-Chlorotoluene			6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
4-Isopropyltoluene	11000		6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	560 J
Acetone	200	500000	16	6 U	6 U	7 U	6 U	6 U	200	6 U	28 U
Bromobenzene			6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
Bromomethane			6 U	6 R	6 U	7 U	6 R	6 R	8 R	6 R	28 U
Carbon Disulfide	2700		6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
Chloroform	300	350000	6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	10 DJB
Ethylbenzene	5500	390000	1 J	6 U	6 U	2 J	6 U	6 U	8 U	6 U	28 U
Hexachlorobutadiene			6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
Iodomethane			6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
Isopropylbenzene	5000		6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	210 J
m,p-Xylene	1200		4 J	6 U	6 U	7 J	6 U	6 U	2 J	6 U	28 U
Methylene Chloride	100	500000	2 J	2 J	6 U	7 U	2 J	2 J	3 J	6 U	28 U
Naphthalene			6 U	1 JB	6 U	2 JB	6 U	6 U	8 U	6 U	1000 DJB
n-Butylbenzene	12000		6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
n-Propylbenzene	3700	500000	6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	130 J
o-Xylene	600		1 J	6 U	6 U	3 J	6 U	6 U	8 U	6 U	28 U
sec-Butylbenzene	11000	500000	6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	400 J
tert-Butylbenzene	11000	500000	6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
Toluene	1500	500000	6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
Vinyl Chloride	200	13000	6 U	6 U	6 U	7 U	6 U	6 U	8 U	6 U	28 U
Xylene (Total)			6 J	6 U	6 U	9	6 U	6 U	2 J	6 U	28 U

Notes:  
 Bgs - Below ground surface  
 U - The analyte was not detected at the indicated quantitation limit.  
 J - The associated value is an approximate concentration of the analyte.  
 UJ - The analyte was not detected at the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.  
 R - The sample results are rejected. The presence or absence of the analyte can not be verified  
 B - A trace concentration was detected below the reporting limit and equal to or above the detection limit.  
 - Concentration exceeds corresponding TAGM 4046 SCO, but not the corresponding 6 NYCRR Part 375 Commercial SCO.  
 - Concentration exceeds corresponding 6 NYCRR Part 375 Commercial SCO.

**Table 5-1**  
**Summary of Soil Boring Sampling Results (VOCs)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID Sampling Depth (feet bgs) Sampling Date Matrix Units	NYSDEC TAGM 4046 Soil Cleanup Objective ug/kg	6 NYCRR Part 375 Draft Commercial Soil Cleanup Objective ug/kg	ORC-SB-08 0.5-1.5 05-03-06 Soil ug/kg	ORC-SB-08 5-6 05-03-06 Soil ug/kg	ORC-SB-09 2-3 05-04-06 Soil ug/kg	ORC-SB-10 1-2 05-04-06 Soil ug/kg	ORC-SB-11 13-14 05-04-06 Soil ug/kg	ORC-SB-12 43-44 05-05-06 Soil ug/kg	ORC-SB13 7-8 05-08-06 Soil ug/kg	ORC-SB-14 7-8 05-08-06 Soil ug/kg	ORC-SB-14 12-13 05-08-06 Soil ug/kg	ORC-SB-15 3-4 05-09-06 Soil ug/kg
1,1,2,2-Tetrachloroethane	600		5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
1,2,3-Trichlorobenzene			5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
1,2,3-Trichloropropane			5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
1,2,4-Trichlorobenzene	3400		5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
1,2,4-Trimethylbenzene	13000	190000	5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
1,2-Dibromo-3-chloropropane			5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
1,2-Dichlorobenzene	7900	500000	5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
1,3,5-Trimethylbenzene	3300	190000	5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	7	7 U	6 UJ
1,3-Dichlorobenzene	1600	280000	5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
1,4-Dichlorobenzene	8500	130000	5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
2-Butanone			5 U	6 U	6 U	5 U	6 U	6 U	6 U	5 U	16	6 U
2-Chlorotoluene			5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
4-Chlorotoluene			5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
4-Isopropyltoluene	11000		5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
Acetone	200	500000	5 U	6 U	6 U	5 U	6 U	6 U	6 U	17	50	6 U
Bromobenzene			5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
Bromomethane			5 U	6 R	6 R	5 R	6 R	6 R	6 U	5 U	7 U	6 U
Carbon Disulfide	2700		5 U	6 U	6 U	5 U	6 U	6 U	6 U	2 J	7 U	6 U
Chloroform	300	350000	5 U	6 U	6 U	5 U	2 JB	6 U	6 U	5 U	7 U	6 U
Ethylbenzene	5500	390000	5 U	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 U
Hexachlorobutadiene			5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
Iodomethane			5 U	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 U
Isopropylbenzene	5000		5 U	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 U
m,p-Xylene	1200		2 J	6 U	4 J	5 U	6 U	6 U	6 U	5 U	7 U	6 U
Methylene Chloride	100	500000	5 U	2 J	4 J	2 J	2 J	3 J	6 U	5 U	7 U	6 U
Naphthalene			5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
n-Butylbenzene	12000		5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
n-Propylbenzene	3700	500000	5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
o-Xylene	600		5 U	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 U
sec-Butylbenzene	11000	500000	5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
tert-Butylbenzene	11000	500000	5 UJ	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 UJ
Toluene	1500	500000	5 U	6 U	6 U	5 U	6 U	6 U	6 U	5 U	7 U	6 U
Vinyl Chloride	200	13000	5 U	6 U	6 U	5 R	6 U	6 U	6 U	5 U	7 U	6 U
Xylene (Total)			2 J	6 U	4 J	5 U	6 U	6 U	6 U	5 U	7 U	6 U

Notes:

Bgs - Below ground surface


U - The analyte was not detected at the indicated quantitation limit.


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R - The sample results are rejected. The presence or absence of the analyte can not be verified

B - A trace concentration was detected below the reporting limit and equal to or above the detection limit.

 - Concentration exceeds corresponding TAGM 4046 SCO, but not the corresponding 6 NYCRR Part 375 Commercial SCO.

 - Concentration exceeds corresponding 6 NYCRR Part 375 Commercial SCO.

**Table 5-1**  
**Summary of Soil Boring Sampling Results (VOCs)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID Sampling Depth (feet bgs) Sampling Date Matrix Units	NYSDEC TAGM 4046 Soil Cleanup Objective ug/kg	6 NYCRR Part 375 Draft Commercial Soil Cleanup Objective ug/kg	ORC-SB-15 9-10 05-09-06 Soil ug/kg	ORC-SB-16 1-2 05-09-06 Soil ug/kg	ORC-SB-16 9.5-10.5 05-09-06 Soil ug/kg	ORC-SB-17 1-2 05-09-06 Soil ug/kg	ORC-SB-17 7-8 05-09-06 Soil ug/kg	ORC-SB-18 2.5-3.5 05-09-06 Soil ug/kg	ORC-SB-18 7-8 05-09-06 Soil ug/kg	ORC-SB-19 6-7 05-09-06 Soil ug/kg	ORC-SB-X2 6-7 05-09-06 Soil ug/kg
1,1,2,2-Tetrachloroethane	600		6 U	6 UJ	6 U	5 U	6 U	6 U	6 U	6 U	6 U
1,2,3-Trichlorobenzene			6 U	6 UJ	6 U	5 U	6 U	6 U	6 U	6 U	6 U
1,2,3-Trichloropropane			6 U	6 UJ	6 U	5 U	6 U	6 U	6 U	6 U	6 U
1,2,4-Trichlorobenzene	3400		6 U	6 UJ	6 U	5 U	6 U	6 U	6 U	6 U	6 U
1,2,4-Trimethylbenzene	13000	190000	6 U	6 UJ	6 U	38	4 J	6 U	6 U	6 U	6 U
1,2-Dibromo-3-chloropropane			6 U	6 UJ	6 U	5 U	6 U	6 U	6 U	6 U	6 U
1,2-Dichlorobenzene	7900	500000	6 U	6 UJ	6 U	5 U	6 U	6 U	6 U	6 U	6 U
1,3,5-Trimethylbenzene	3300	190000	6 U	6 UJ	6 U	10	6 U	6 U	6 U	6 U	6 U
1,3-Dichlorobenzene	1600	280000	6 U	6 UJ	6 U	5 U	6 U	6 U	6 U	6 U	6 U
1,4-Dichlorobenzene	8500	130000	6 U	6 UJ	6 U	5 U	6 U	6 U	6 U	6 U	6 U
2-Butanone			6 U	6 U	6 U	5 U	6 U	18	6 U	6 U	6 U
2-Chlorotoluene			6 U	6 UJ	6 U	5 U	6 U	6 U	6 U	6 U	6 U
4-Chlorotoluene			6 U	6 UJ	6 U	5 U	6 U	6 U	6 U	6 U	6 U
4-Isopropyltoluene	11000		6 U	6 UJ	6 U	5 J	6 U	6 U	6 U	6 U	6 U
Acetone	200	500000	6 U	6 U	24	26	13	110	16	22	20
Bromobenzene			6 U	6 UJ	6 U	5 U	6 U	6 U	6 U	6 U	6 U
Bromomethane			6 U	6 U	6 U	5 U	6 U	6 U	6 U	6 U	6 U
Carbon Disulfide	2700		6 U	6 U	6 U	5 U	6 U	6 U	6 U	6 U	6 U
Chloroform	300	350000	6 U	6 U	6 U	5 U	6 U	6 U	6 U	6 U	6 U
Ethylbenzene	5500	390000	6 U	6 U	6 U	5 U	6 U	6 U	6 U	6 U	6 U
Hexachlorobutadiene			6 U	6 UJ	6 U	5 U	6 U	6 U	6 U	6 U	6 U
Iodomethane			6 U	6 U	6 U	5 U	6 U	6 U	6 U	6 U	6 U
Isopropylbenzene	5000		6 U	6 U	6 U	4 J	6 U	6 U	6 U	6 U	6 U
m,p-Xylene	1200		6 U	6 U	6 U	6	4 J	6 U	6 U	6 U	6 U
Methylene Chloride	100	500000	6 U	6 U	6 U	2 J	3 J	6 U	6 U	2 J	6 U
Naphthalene			6 U	6 UJ	6 U	100 B	9 B	6 U	6 U	6 U	6 U
n-Butylbenzene	12000		6 U	6 UJ	6 U	5 U	6 U	6 U	6 U	6 U	6 U
n-Propylbenzene	3700	500000	6 U	6 UJ	6 U	3 J	6 U	6 U	6 U	6 U	6 U
o-Xylene	600		6 U	6 U	6 U	10	6 U	6 U	6 U	6 U	6 U
sec-Butylbenzene	11000	500000	6 U	6 UJ	11	3 J	6 U	4 J	6 U	6 U	6 U
tert-Butylbenzene	11000	500000	6 U	6 UJ	6 U	5 U	6 U	6 U	6 U	6 U	6 U
Toluene	1500	500000	6 U	6 U	6 U	5 U	6 U	6 U	6 U	2 J	6 U
Vinyl Chloride	200	13000	6 U	6 U	6 U	5 U	6 U	6 U	6 U	6 U	6 U
Xylene (Total)			6 U	6 U	6 U	16	4 J	6 U	6 U	6 U	6 U

Notes:

Bgs - Below ground surface


U - The analyte was not detected at the indicated quantitation limit.


J - The associated value is an approximate concentration of the analyte.

UJ - The analyte was not detected at the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.

R - The sample results are rejected. The presence or absence of the analyte can not be verified

B - A trace concentration was detected below the reporting limit and equal to or above the detection limit.

 - Concentration exceeds corresponding TAGM 4046 SCO, but not the corresponding 6 NYCRR Part 375 Commercial SCO.

 - Concentration exceeds corresponding 6 NYCRR Part 375 Commercial SCO.

**Table 5-2**  
**Summary of Soil Boring Sampling Results (SVOCs)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID Sampling Depth (feet bgs) Sampling Date Matrix Units	NYSDEC TAGM 4046 Soil Cleanup Objective ug/kg	6 NYCRR Part 375 Draft Commercial Soil Cleanup Objective ug/kg	ORC-SB-01 0.5-1.5 05-01-06 Soil ug/kg	ORC-SB-02 7.5-8.5 05-01-06 Soil ug/kg	ORC-SB-03 4.5-5.5 05-02-06 Soil ug/kg	ORC-SB-04 1-2 05-02-06 Soil ug/kg	ORC-SB-04 6-7 05-02-06 Soil ug/kg	ORC-SB-05 10-11 05-02-06 Soil ug/kg	ORC-SB-06 1-2 05-03-06 Soil ug/kg	ORC-SB-06 6.5-7.5 05-03-06 Soil ug/kg	ORC-SB-07 5-6 05-03-06 Soil ug/kg
2-Methylnaphthalene	36400		38 J	390 U	380 U	45 J	490 U	400 U	45 J	500 UJ	200 J
2-Nitroaniline	430		740 U	800 U	770 U	780 U	1000 U	820 U	760 U	1000 UJ	780 U
3,3-Dichlorobenzidine			370 U	390 U	380 U	380 U	490 U	400 U	370 U	500 UJ	380 U
3-Nitroaniline	500		740 U	800 U	770 U	780 U	1000 U	820 U	760 U	1000 UJ	780 U
4-Bromophenyl-phenylether			370 U	390 U	380 U	380 U	490 U	400 U	370 U	500 UJ	380 U
4-Chloroaniline	220		370 U	390 U	380 U	380 U	490 U	400 U	370 U	500 UJ	380 U
4-Chlorophenyl-phenylether			370 U	390 U	380 U	380 U	490 U	400 U	370 U	500 UJ	380 U
4-Nitroaniline			740 U	800 U	770 U	780 U	1000 U	820 U	760 U	1000 UJ	780 U
Acenaphthene	50000	500000	370 U	390 U	49 J	380 U	490 U	400 U	370 U	500 UJ	380 U
Acenaphthylene	41000	500000	370 U	390 U	170 J	380 U	490 U	400 U	370 U	500 UJ	380 U
Anthracene	50000	500000	370 U	390 U	300 J	71 J	490 U	400 U	370 U	500 UJ	380 U
Benzo(a)anthracene	224	5600	48 J	390 U	1000	220 J	490 U	140 J	150 J	500 UJ	39 J
Benzo(a)pyrene	61	1000	42 J	390 U	1200	130 J	490 U	120 J	140 J	500 UJ	380 U
Benzo(b)fluoranthene	1100	5600	67 J	390 U	1500	240 J	110 J	140 J	230 J	500 UJ	380 U
Benzo(g,h,i)perylene	50000	500000	370 U	390 U	840	82 J	490 U	73 J	110 J	500 UJ	380 U
Benzo(k)fluoranthene	1100	56000	370 U	390 U	600	110 J	490 U	79 J	110 J	500 UJ	380 U
bis(2-Ethylhexyl)phthalate	50000		140 J	150 J	880	500	280 J	380 J	320 J	300 J	230 J
Butylbenzylphthalate	50000		370 U	390 U	380 U	380 U	490 U	400 U	370 U	500 UJ	380 U
Carbazole			370 U	390 U	90 J	380 U	490 U	400 U	370 U	500 UJ	380 U
Chrysene	400	56000	94 J	390 U	1100	320 J	490 U	150 J	310 J	500 UJ	83 J
Dibenzo(a,h)anthracene	14	560	370 U	390 U	200 J	380 U	490 U	400 U	370 U	500 UJ	380 U
Dibenzofuran	6200		370 U	390 U	380 U	380 U	490 U	400 U	370 U	500 UJ	47 J
Fluoranthene	50000	500000	84 J	390 U	2000	450	130 J	220 J	230 J	500 UJ	70 J
Fluorene	50000	500000	370 U	390 U	55 J	380 U	490 U	400 U	370 U	500 UJ	380 U
Indeno(1,2,3-cd)pyrene	3200	5600	370 U	390 U	680	73 J	490 U	67 J	92 J	500 UJ	380 U
Isophorone	4400		370 U	390 U	380 U	380 U	490 U	400 U	370 U	500 UJ	380 U
Naphthalene	13000	500000	370 U	390 U	380 U	380 U	490 U	400 U	370 U	500 UJ	110 J
Phenanthrene	50000	500000	89 J	390 U	790	340 J	490 U	58 J	140 J	500 UJ	150 J
Pyrene	50000	500000	100 J	390 U	1800	420	240 J	210 J	210 J	500 UJ	62 J

Notes:

Bgs - Below ground surface

U - The analyte was not detected at the indicated quantitation limit.

J - The associated value is an approximate concentration of the analyte.

UJ - The analyte was not detected at the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.

R - The sample results are rejected. The presence or absence of the analyte can not be verified.

B - A trace concentration was detected below the reporting limit and equal to or above the detection limit.

- Concentration exceeds corresponding TAGM 4046 SCO, but not the corresponding 6 NYCRR Part 375 Commercial SCO.

- Concentration exceeds corresponding 6 NYCRR Part 375 Commercial SCO.



**Table 5-2**  
**Summary of Soil Boring Sampling Results (SVOCs)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID Sampling Depth (feet bgs) Sampling Date Matrix Units	NYSDEC TAGM 4046 Soil Cleanup Objective ug/kg	6 NYCRR Part 375 Draft Commercial Soil Cleanup Objective ug/kg	ORC-SB-07 10.5-11.5 05-03-06 Soil ug/kg	ORC-SB-08 0.5-1.5 05-03-06 Soil ug/kg	ORC-SB-08 5-6 05-03-06 Soil ug/kg	ORC-SB-09 2-3 05-04-06 Soil ug/kg	ORC-SB-10 1-2 05-04-06 Soil ug/kg	ORC-SB-11 13-14 05-04-06 Soil ug/kg	ORC-SB-12 43-44 05-05-06 Soil ug/kg	ORC-SB13 7-8 05-08-06 Soil ug/kg	ORC-SB-14 7-8 05-08-06 Soil ug/kg	ORC-SB-14 12-13 05-08-06 Soil ug/kg
2-Methylnaphthalene	36400		14000 E	1600	410 U	420 U	360 U	370 U	410 UJ	380 U	3500 U	460 U
2-Nitroaniline	430		820 U	730 U	820 U	840 U	720 U	750 U	840 UJ	770 U	7100 U	940 U
3,3-Dichlorobenzidine			400 U	360 U	410 U	420 U	360 U	370 U	410 UJ	380 U	3500 UJ	460 UJ
3-Nitroaniline	500		820 U	730 U	820 U	840 U	720 U	750 U	840 UJ	770 U	7100 U	940 U
4-Bromophenyl-phenylether			400 U	360 U	410 U	420 U	360 U	370 U	410 UJ	380 U	3500 U	460 U
4-Chloroaniline	220		400 U	360 U	410 U	420 U	360 U	370 U	410 UJ	380 U	3500 U	460 U
4-Chlorophenyl-phenylether			400 U	360 U	410 U	420 U	360 U	370 U	410 UJ	380 U	3500 U	460 U
4-Nitroaniline			820 U	730 U	820 U	840 U	720 U	750 U	840 UJ	770 U	7100 U	940 U
Acenaphthene	50000	500000	400 U	360 U	410 U	420 U	360 U	370 U	410 UJ	380 U	810 J	460 U
Acenaphthylene	41000	500000	400 U	360 U	410 U	420 U	360 U	370 U	410 UJ	380 U	3500 U	460 U
Anthracene	50000	500000	400 U	360 U	410 U	420 U	360 U	370 U	410 UJ	380 U	3500 U	460 U
Benzo(a)anthracene	224	5600	400 U	130 J	410 U	420 U	360 U	47 J	410 UJ	60 J	3500 UJ	460 UJ
Benzo(a)pyrene	61	1000	400 U	72 J	410 U	420 U	360 U	51 J	410 UJ	380 UJ	410 J	460 UJ
Benzo(b)fluoranthene	1100	5600	400 U	140 J	410 U	420 U	360 U	61 J	410 UJ	380 UJ	480 J	460 UJ
Benzo(g,h,i)perylene	50000	500000	400 U	45 J	410 U	420 U	360 U	40 J	410 UJ	380 UJ	3500 UJ	460 UJ
Benzo(k)fluoranthene	1100	56000	400 U	360 U	410 U	420 U	360 U	370 U	410 UJ	380 UJ	3500 UJ	460 UJ
bis(2-Ethylhexyl)phthalate	50000		330 J	160 J	320 J	150 J	280 J	340 J	150 J	120 J	420 J	170 J
Butylbenzylphthalate	50000		400 U	360 U	410 U	420 U	360 U	370 U	410 UJ	380 U	3500 UJ	460 UJ
Carbazole			400 U	44 J	410 U	420 U	360 U	370 U	410 UJ	380 U	3500 U	460 U
Chrysene	400	56000	400 U	460	410 U	420 U	360 U	44 J	410 UJ	78 J	410 J	460 UJ
Dibenzo(a,h)anthracene	14	560	400 U	39 J	410 U	420 U	360 U	370 U	410 UJ	380 UJ	3500 UJ	460 UJ
Dibenzofuran	6200		400 U	520	410 U	420 U	360 U	370 U	410 UJ	380 U	3500 U	460 U
Fluoranthene	50000	500000	71 J	150 J	410 U	420 U	360 U	53 J	410 UJ	92 J	970 J	460 U
Fluorene	50000	500000	740	360 U	410 U	420 U	360 U	370 U	410 UJ	380 U	3500 U	460 U
Indeno(1,2,3-cd)pyrene	3200	5600	400 U	360 U	410 U	420 U	360 U	370 U	410 UJ	380 UJ	3500 UJ	460 UJ
Isophorone	4400		400 U	360 U	410 U	420 U	360 U	370 U	410 UJ	380 U	3500 U	460 U
Naphthalene	13000	500000	980	910	410 U	420 U	360 U	370 U	410 UJ	380 U	3500 U	460 U
Phenanthrene	50000	500000	2300	1200	410 U	420 U	360 U	370 U	410 UJ	58 J	3500 U	460 U
Pyrene	50000	500000	290 J	150 J	410 U	420 U	360 U	55 J	410 UJ	120 J	1400 J	460 UJ

Notes:

Bgs - Below ground surface

U - The analyte was not detected at the indicated quantitation limit.

J - The associated value is an approximate concentration of the analyte.

UJ - The analyte was not detected at the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.

R - The sample results are rejected. The presence or absence of the analyte can not be verified.

B - A trace concentration was detected below the reporting limit and equal to or above the detection limit.

  - Concentration exceeds corresponding TAGM 4046 SCO, but not the corresponding 6 NYCRR Part 375 Commercial SCO.

  - Concentration exceeds corresponding 6 NYCRR Part 375 Commercial SCO.

**Table 5-2**  
**Summary of Soil Boring Sampling Results (SVOCs)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID Sampling Depth (feet bgs) Sampling Date Matrix Units	NYSDEC TAGM 4046 Soil Cleanup Objective ug/kg	6 NYCRR Part 375 Draft Commercial Soil Cleanup Objective ug/kg	ORC-SB-15 3-4 05-09-06 Soil ug/kg	ORC-SB-15 9-10 05-09-06 Soil ug/kg	ORC-SB-16 1-2 05-09-06 Soil ug/kg	ORC-SB-16 9.5-10.5 05-09-06 Soil ug/kg	ORC-SB-17 1-2 05-09-06 Soil ug/kg	ORC-SB-17 7-8 05-09-06 Soil ug/kg	ORC-SB-18 2.5-3.5 05-09-06 Soil ug/kg	ORC-SB-18 7-8 05-09-06 Soil ug/kg	ORC-SB-19 6-7 05-09-06 Soil ug/kg	ORC-SB-X2 6-7 05-09-06 Soil ug/kg
2-Methylnaphthalene	36400		160 J	390 U	140 J	72 J	2900 J	53 J	44 J	380 U	400 U	410 U
2-Nitroaniline	430		800 U	800 U	760 U	790 U	7400 U	790 U	750 U	770 U	810 U	840 U
3,3-Dichlorobenzidine			390 U	390 U	370 U	390 U	3600 U	390 UJ	370 UJ	380 U	400 U	410 U
3-Nitroaniline	500		800 U	800 U	760 U	790 U	7400 U	790 U	750 U	770 U	810 U	840 U
4-Bromophenyl-phenylether			390 U	390 U	370 U	390 U	3600 U	390 U	370 U	380 U	400 U	410 U
4-Chloroaniline	220		390 U	390 U	370 U	390 U	3600 U	390 U	370 U	380 U	400 U	410 U
4-Chlorophenyl-phenylether			390 U	390 U	370 U	390 U	3600 U	390 U	370 U	380 U	400 U	410 U
4-Nitroaniline			800 U	800 U	760 U	790 U	7400 U	790 U	750 U	770 U	810 U	840 U
Acenaphthene	50000	500000	81 J	390 U	370 U	200 J	650 J	390 U	98 J	380 U	400 U	410 U
Acenaphthylene	41000	500000	57 J	390 U	370 U	390 U	3600 U	390 U	370 U	380 U	400 U	410 U
Anthracene	50000	500000	660	390 U	370 U	390 U	3600 U	390 U	370 U	380 U	400 U	410 U
Benzo(a)anthracene	224	5600	3000	390 U	69 J	48 J	3600 U	390 UJ	38 J	380 U	230 J	410 U
Benzo(a)pyrene	61	1000	2600	390 U	50 J	390 U	370 J	390 UJ	370 UJ	380 U	200 J	410 U
Benzo(b)fluoranthene	1100	5600	3300	390 U	96 J	390 U	640 J	390 UJ	370 UJ	380 U	270 J	410 U
Benzo(g,h,i)perylene	50000	500000	2800	390 U	41 J	390 U	3600 U	390 UJ	370 UJ	380 U	400 U	410 U
Benzo(k)fluoranthene	1100	56000	1100	390 U	370 U	390 U	3600 U	390 UJ	370 UJ	380 U	100 J	410 U
bis(2-Ethylhexyl)phthalate	50000		230 J	100 J	900	190 J	3600 U	330 J	80 J	160 J	180 J	190 J
Butylbenzylphthalate	50000		390 U	390 U	370 U	390 U	3600 U	390 UJ	370 UJ	380 U	400 U	410 U
Carbazole			220 J	390 U	370 U	390 U	3600 U	390 U	370 U	380 U	400 U	410 U
Chrysene	400	56000	3800	390 U	140 J	91 J	670 J	390 UJ	45 J	380 U	270 J	410 U
Dibenzo(a,h)anthracene	14	560	800	390 U	370 U	390 U	3600 U	390 UJ	370 UJ	380 U	400 U	410 U
Dibenzofuran	6200		120 J	390 U	49 J	130 J	3600 U	390 U	52 J	380 U	400 U	410 U
Fluoranthene	50000	500000	4500	390 U	150 J	100 J	1400 J	42 J	55 J	380 U	360 J	60 J
Fluorene	50000	500000	110 J	390 U	370 U	300 J	630 J	390 U	170 J	380 U	400 U	410 U
Indeno(1,2,3-cd)pyrene	3200	5600	2200	390 U	370 U	390 U	3600 U	390 UJ	370 UJ	380 U	400 U	410 U
Isophorone	4400		390 U	390 U	370 U	390 U	3600 U	390 U	370 U	380 U	400 U	410 U
Naphthalene	13000	500000	110 J	390 U	68 J	390 U	1700 J	56 J	59 J	380 U	400 U	410 U
Phenanthrene	50000	500000	3100	390 U	210 J	680	1200 J	63 J	70 J	380 U	170 J	410 U
Pyrene	50000	500000	7800 E	390 U	120 J	170 J	1200 J	74 J	190 J	380 U	380 J	66 J

Notes:

Bgs - Below ground surface

U - The analyte was not detected a the indicated quantitation limit.

J - The associated value is an approximate concentration of the analyte.

UJ - The analyte was not detected at the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.

R - The sample results are rejected. The presence or absence of the analyte can not be verified.

B - A trace concentration was detected below the reporting limit and equal to or above the detection limit.

   - Concentration exceeds corresponding TAGM 4046 SCO, but not the corresponding 6 NYCRR Part 375 Commercial SCO.

   - Concentration exceeds corresponding 6 NYCRR Part 375 Commercial SCO.



**Table 5-3**  
**Summary of Surface Soil Sampling Results (SVOCs)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID Sample Depth (inches bgs) Date Matrix Units	NYSDEC TAGM 4046 Soil Cleanup Objective ug/kg	6 NYCRR Part 375 Draft Commercial Soil Cleanup Objective ug/kg	ORC-SS-01 0-2 04-27-06 Soil ug/kg	ORC-SS-02 0-2 04-27-06 Soil ug/kg	ORC-SS-03 0-2 04-27-06 Soil ug/kg	ORC-SS-04 0-2 04-27-06 Soil ug/kg	ORC-SS-04 0-2 04-27-06 Soil ug/kg	ORC-SS-05 0-2 04-27-06 Soil ug/kg	ORC-SS-06 0-2 04-27-06 Soil ug/kg	ORC-SS-07 0-2 04-27-06 Soil ug/kg	ORC-SS-X 0-2 04-27-06 Soil ug/kg	ORC-SS-08 0-2 05-01-06 Soil ug/kg
2-Methylnaphthalene	36400		180 J	430 U	1700 U	420	430 DJ	390 U	250 J	89 J	140 J	370 U
4-Chloroaniline	220		430 UJ	430 U	1700 U	44 J	210 DJ	390 U	400 U	380 U	420 U	370 U
Acenaphthene	50000	500000	140 J	430 U	1700 U	44 J	1600 U	390 U	400 U	46 J	420 U	370 U
Acenaphthylene	41000	500000	160 J	210 J	310 J	220 J	260 DJ	390 U	400 U	590	420 U	68 J
Anthracene	50000	500000	370 J	180 J	450 J	300 J	270 DJ	390 U	400 U	600	420 U	72 J
Benzo(a)anthracene	224	5600	1100 J	470	2100 J	610	560 DJ	390 U	160 J	2400	190 J	230 J
Benzo(a)pyrene	61	1000	740 J	290 J	2200 J	520	500 DJ	390 U	140 J	2600	150 J	310 J
Benzo(b)fluoranthene	1100	5600	1400 J	660	3100 J	1400	1200 DJ	390 U	320 J	4200	340 J	370
Benzo(g,h,i)perylene	50000	500000	390 J	150 J	1700 UJ	410	400 DJ	390 U	400 UJ	1300	420 UJ	200 J
Benzo(k)fluoranthene	1100	56000	460 J	260 J	1200 J	400 J	430 DJ	390 U	130 J	1400	120 J	140 J
bis(2-Ethylhexyl)phthalate	50000		130 J	120 J	200 J	16000 E	12000 D	130 J	120 J	160 J	110 J	80 J
Butylbenzylphthalate	50000		430 UJ	430 U	1700 UJ	50 J	1600 U	390 U	400 U	380 U	420 U	370 U
Carbazole			190 J	49 J	1700 UJ	80 J	1600 U	390 U	400 U	88 J	420 U	370 U
Chrysene	400	56000	1100 J	540	2000 J	860	800 DJ	390 U	350 J	2400	330 J	270 J
Dibenzo(a,h)anthracene	14	560	140 J	50 J	1700 UJ	120 J	1600 U	390 U	400 UJ	370 J	420 UJ	55 J
Dibenzofuran	6200		100 J	430 U	1700 U	160 J	1600 U	390 U	82 J	52 J	49 J	370 U
Di-n-butylphthalate	8100		430 UJ	430 U	1700 UJ	460	390 DJ	390 U	400 U	380 U	420 U	370 U
Di-n-octylphthalate	50000		430 UJ	430 U	1700 UJ	98 J	1600 U	390 U	400 UJ	380 U	420 UJ	370 U
Fluoranthene	50000	500000	2200 J	1200	3400 J	1000	760 DJ	46 J	250 J	4700	250 J	440
Fluorene	50000	500000	130 J	430 U	1700 U	410 U	1600 U	390 U	400 U	76 J	420 U	370 U
Indeno(1,2,3-cd)pyrene	3200	5600	370 J	430 U	1100 J	390 J	390 DJ	390 U	400 UJ	1200	74 J	170 J
Naphthalene	13000	500000	250 J	430 U	1700 U	230 J	220 DJ	390 U	140 J	87 J	74 J	370 U
Phenanthrene	50000	500000	1700 J	420 J	1300 J	660	610 DJ	41 J	330 J	1200	240 J	150 J
Pyrene	50000	500000	1900 J	860	3300 J	780	730 DJ	64 J	360 J	3700	380 J	390

Notes:

Bgs - Below ground surface

U - The analyte was not detected at the indicated quantitation limit.

J - The associated value is an approximate concentration of the analyte.

UJ - The analyte was not detected at the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.

D - Compound concentration obtained from a diluted analysis

- Concentration exceeds corresponding TAGM 4046 SCO, but not the corresponding 6 NYCRR Part 375 Commercial SCO.

- Concentration exceeds corresponding 6 NYCRR Part 375 Commercial SCO.

**Table 5-3**  
**Summary of Surface Soil Sampling Results (SVOCs)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID Sample Depth (inches bgs) Date Matrix Units	NYSDEC TAGM 4046 Soil Cleanup Objective ug/kg	6 NYCRR Part 375 Draft Commercial Soil Cleanup Objective ug/kg	ORC-SS-09 0-2 05-02-06 Soil ug/kg	ORC-SS-10 0-2 05-03-06 Soil ug/kg	ORC-SS-11 0-2 05-03-06 Soil ug/kg	ORC-SS-12 0-2 05-04-06 Soil ug/kg	ORC-SS-13 0-2 05-04-06 Soil ug/kg	ORC-SS-14 0-2 05-04-06 Soil ug/kg	ORC-SS-15 0-2 05-08-06 Soil ug/kg	ORC-SS-16 0-2 05-09-06 Soil ug/kg	ORC-SS-17 0-2 05-10-06 Soil ug/kg	ORC-SS-18 0-2 06-05-06 Soil ug/kg
2-Methylnaphthalene	36400		260 J	570	1500	420 U	340 U	590 U	340 U	330 U	350 U	390 U
4-Chloroaniline	220		380 U	380 U	360 U	420 U	340 U	590 U	340 U	330 U	350 U	390 U
Acenaphthene	50000	500000	380 U	380 U	360 U	420 U	340 U	590 U	340 U	330 U	350 U	390 U
Acenaphthylene	41000	500000	120 J	110 J	93 J	420 U	340 U	83 J	340 U	330 U	350 U	390 U
Anthracene	50000	500000	120 J	130 J	56 J	420 U	340 U	84 J	340 U	330 U	350 U	390 U
Benzo(a)anthracene	224	5600	340 J	230 J	260 J	420 U	340 U	310 J	340 U	330 UJ	350 U	92 J
Benzo(a)pyrene	61	1000	320 J	180 J	190 J	420 U	340 U	340 J	340 U	330 UJ	350 U	86 J
Benzo(b)fluoranthene	1100	5600	830	410	380	420 U	52 J	470 J	340 U	330 UJ	350 U	150 J
Benzo(g,h,i)perylene	50000	500000	260 J	140 J	120 J	420 U	340 U	280 J	340 U	330 UJ	350 U	390 UJ
Benzo(k)fluoranthene	1100	56000	300 J	150 J	110 J	420 U	340 U	230 J	340 U	330 UJ	350 U	71 J
bis(2-Ethylhexyl)phthalate	50000		80 J	64 J	140 J	190 J	130 J	180 J	90 J	100 J	220 J	83 J
Butylbenzylphthalate	50000		380 U	380 U	360 U	420 U	340 U	590 U	340 U	330 UJ	350 U	390 U
Carbazole			65 J	43 J	50 J	420 U	340 U	60 J	340 U	330 U	350 U	390 U
Chrysene	400	56000	680	370 J	620	420 U	48 J	490 J	340 U	330 UJ	40 J	150 J
Dibenzo(a,h)anthracene	14	560	130 J	49 J	70 J	420 U	340 U	120 J	340 U	330 UJ	350 U	390 UJ
Dibenzofuran	6200		94 J	100 J	450	420 U	340 U	590 U	340 U	330 U	350 U	390 U
Di-n-butylphthalate	8100		380 U	380 U	360 U	420 U	340 U	590 U	340 U	330 U	350 U	390 U
Di-n-octylphthalate	50000		380 U	380 U	360 U	420 U	340 U	590 U	340 U	330 UJ	350 U	390 UJ
Fluoranthene	50000	500000	570	330 J	440	420 U	42 J	680	340 U	48 J	54 J	160 J
Fluorene	50000	500000	380 U	380 U	360 U	420 U	340 U	590 U	340 U	330 U	350 U	390 U
Indeno(1,2,3-cd)pyrene	3200	5600	270 J	120 J	110 J	420 U	340 U	250 J	340 U	330 UJ	350 U	390 UJ
Naphthalene	13000	500000	110 J	230 J	880	420 U	340 U	590 U	340 U	330 U	350 U	390 U
Phenanthrene	50000	500000	410	330 J	1100	420 U	340 U	330 J	340 U	330 U	350 U	55 J
Pyrene	50000	500000	460	340 J	350 J	420 U	35 J	600	340 U	75 J	52 J	210 J

Notes:

Bgs - Below ground surface

U - The analyte was not detected at the indicated quantitation limit.

J - The associated value is an approximate concentration of the analyte.

UJ - The analyte was not detected at the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.

D - Compound concentration obtained from a diluted analysis

  - Concentration exceeds corresponding TAGM 4046 SCO, but not the corresponding 6 NYCRR Part 375 Commercial SCO.

  - Concentration exceeds corresponding 6 NYCRR Part 375 Commercial SCO.

**Table 5-4  
Summary of Soil Boring Sampling Results (Metals)  
USEPA Brownfields Assessment Program  
Former D&H Rail Yard, Oneonta River Corporation Properties  
Oneonta, New York**

Sample ID Sample Depth (feet bgs) Date Matrix Units	NYSDEC TAGM 4046 Soil Cleanup Objective mg/kg	6 NYCRR Part 375 Draft Commercial Soil Cleanup Objectives mg/kg	ORC-SB-01 0.5-1.5 04-28-06 Soil mg/kg	ORC-SB-02 7.5-8.5 05-01-06 Soil mg/kg	ORC-SB-03 4.5-5.5 05-02-06 Soil mg/kg	ORC-SB-04 1-2 05-02-06 Soil mg/kg	ORC-SB-04 6-7 05-02-06 Soil mg/kg	ORC-SB-05 10-11 05-02-06 Soil mg/kg	ORC-SB-06 1-2 05-03-06 Soil mg/kg	ORC-SB-06 6.5-7.5 05-03-06 Soil mg/kg	ORC-SB-07 5-6 05-03-06 Soil mg/kg	ORC-SB-07 10.5-11.5 05-03-06 Soil mg/kg
Aluminum	SB		1890	10300	12500	2170	13200	11200	3940	7850	1060	12500
Antimony	SB		3.2 J	0.041 J	0.079 J	7.1 J	0.14 J	0.047 J	4.9 J	0.15 J	0.37 J	0.037 J
Arsenic	7.5 or SB	16	5.6 J	5.3 J	9.9 J	13.7 J	9.6 J	3.6 J	20.3 J	2.3 J	33.5 J	19.5 J
Barium	300 or SB	400	37.0 J	21.6 J	39.0 J	41.7 J	31.4 J	18.0 J	72.1 J	39.5 J	56.1 J	56.0 J
Beryllium	0.16 or SB	590	0.26 J	0.31 J	0.54 J	0.27 J	0.44 J	0.47 J	0.51 J	0.15 J	0.14 J	0.66 J
Cadmium	1 or SB	9.3	0.33 J	0.44 J	0.96 J	0.33 J	0.53 J	0.58 J	0.37 J	0.29 J	0.42 J	0.77 J
Calcium	SB		27200	878 *	24700 *	1070 *	1080 *	2200 *	1660 *	1380 *	820 *	1040 *
Chromium	10 or SB	400	6.7 J	12.7 J	18.7 J	7.5 J	15.2 J	16.3 J	8.9 J	7.5 J	4.1 J	14.9 J
Cobalt	30 or SB		3.8 J	6.0 J	9.5 J	5.1 J	18.8 J	11.2 J	4.9 J	3.4 J	1.7 J	11.3 J
Copper	25 or SB	270	53.4	7.8	23.0	173	25.3	19.1	146	4.8	42.9	22.0
Iron	2000 or SB		23800 E	21600	30000	15000	25800	26100	18800	11900	25000	26000
Lead	SB	1000	197 J	9.9 J	89.5 J	267 J	13.8 J	18.0 J	255 J	6.5 J	33.9 J	14.2 J
Magnesium	SB		1060 J	2580 J	3750 J	373 J	3270 J	3950 J	850 J	838 J	153 J	3080 J
Manganese	SB	10000	108 J	123 J	445 J	126 J	3870 J	207 J	215 J	266 J	34.9 J	275 J
Mercury	0.1	2.8	0.044	0.023 B	0.046	0.25	0.041	0.030 B	0.16	0.071	0.058	0.067
Nickel	13 or SB	310	9.1 J	16.1 J	28.7 J	11.4 J	25.8 J	27.4 J	13.4 J	6.6 J	3.9 J	28.3 J
Potassium	SB		273 J	246 J	528 J	356 J	409 J	577 J	439 J	156 J	602 J	340 J
Selenium	2 or SB	1500	2.6 J	0.049 UJ	0.051 UJ	3.0 J	0.067 UJ	0.056 UJ	11.7 J	0.38 J	1.7 J	0.044 UJ
Silver	SB	1500	0.036 B	0.033 B	0.015 U	0.18 B	0.16 B	0.016 U	0.17 B	0.12 B	0.074 B	0.012 U
Sodium	SB		184	53.2	51.1	26.8 B	18.8 B	29.4 B	36.3 B	15.1 B	405	26.6 B
Thallium	SB		0.057 UJ	0.24 B	0.060 U	0.14 B	0.079 U	0.065 U	0.18 B	0.080 U	0.52 B	0.051 U
Vanadium	150 or SB		11.0 J	14.8 J	22.1 J	13.1 J	16.1 J	18.4 J	16.1 J	21.5 J	16.1 J	17.9 J
Zinc	20 or SB	10000	30.1 J	43.9 J	99.4 J	36.9 J	67.7 J	70.1 J	35.0 J	30.3 J	5.6 J	71.8 J

Notes:

Bgs - Below ground surface

U - The analyte was not detected at the indicated quantitation limit.

J - The associated value is an approximate concentration of the analyte.

UJ - The analyte was not detected at the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.

B - A trace concentration was detected below the reporting limit and equal to or above the detection limit.

E - Estimated concentration due to presence of interference determined by serial dilution analysis.

\* - Relative percentage difference for duplicate analysis outside of control limit.

  - Concentration exceeds corresponding TAGM 4046 SCO, but not the corresponding 6 NYCRR Part 375 Commercial SCO.

  - Concentration exceeds corresponding 6 NYCRR Part 375 Commercial SCO.

**Table 5-4**  
**Summary of Soil Boring Sampling Results (Metals)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID Sample Depth (feet bgs) Date Matrix Units	NYSDEC TAGM 4046 Soil Cleanup Objective mg/kg	6 NYCRR Part 375 Draft Commercial Soil Cleanup Objectives mg/kg	ORC-SB-08 0.5-1.5 05-03-06 Soil mg/kg	ORC-SB-08 5-6 05-03-06 Soil mg/kg	ORC-SB-09 2-3 05-04-06 Soil mg/kg	ORC-SB-10 1-2 05-04-06 Soil mg/kg	ORC-SB-11 13-14 05-04-06 Soil mg/kg	ORC-SB-12 43-44 05-05-06 Soil mg/kg	ORC-SB13 7-8 05-08-06 Soil mg/kg	ORC-SB-14 7-8 05-08-06 Soil mg/kg	ORC-SB-14 12-13 05-08-06 Soil mg/kg	ORC-SB-15 3-4 05-09-06 Soil mg/kg
Aluminum	SB		2520 E	5040 E	8330 E	12800 E	12900 E	9470	13100	416	11000	2610
Antimony	SB		0.34 J	0.13 J	0.35 J	0.32 J	1.7 J	0.36 J	0.52 J	0.28 J	0.050 UJ	16.5 J
Arsenic	7.5 or SB	16	148 J	13.4 J	9.9 J	11.2 J	10.7 J	11.4 J	7.5 J	4.3 J	4.3 J	24.2 J
Barium	300 or SB	400	87.9 J	24.1 J	23.6 J	37.0 J	44.6 J	23.8 J	43.8 *	1.4 B*	46.3 *	151 *
Beryllium	0.16 or SB	590	0.28 J	0.15 J	0.33 J	0.50 J	0.48 J	0.38 J	0.51	0.044 B	0.48	0.51
Cadmium	1 or SB	9.3	0.57 J	0.18 J	0.21 J	0.56 J	0.46 J	0.22 J	0.57 J	0.042 J	0.37 J	2.0 J
Calcium	SB		1000 E	512 E	1170 E	2150 E	1780 E	1280	2600	368000	34100	4240
Chromium	10 or SB	400	7.3 J	8.0 J	11.4 J	18.6 J	17.9 J	13.3 J	18.7 J	2.2 J	15.9 J	34.1 J
Cobalt	30 or SB		1.8 J	3.4 J	8.3 J	11.2 J	10.7 J	8.7 J	12.2 J	0.55 J	8.9 J	11.3 J
Copper	25 or SB	270	16.1	11.6	12.4	20.6	21.1	14.1	20.4	0.98	14.1	213
Iron	2000 or SB		33600	21500	21100	33700	32900	24000	31500	2200	21400	67900
Lead	SB	1000	12.3 J	9.5 J	11.3 J	13.9 J	13.2 J	12.4 J	12.2 J	2.7 J	12.3 J	1220 J
Magnesium	SB		553 J	1840 J	2770 J	4300 J	4340 J	3140 J	4330 J	5480 J	4110 J	474 J
Manganese	SB	10000	94.3 J	94.0 J	304 J	489 J	501 J	401 J	353 J	50.4 J	254 J	360 J
Mercury	0.1	2.8	0.075	0.016 B	0.032 B	0.028 B	0.030 B	0.024 B	0.012 B	0.0062 B	0.029 B	0.22 B
Nickel	13 or SB	310	5.2 J	11.2 J	19.7 J	28.7 J	29.0 J	21.9 J	31.0 J	2.5 J	23.3 J	34.9 J
Potassium	SB		395 J	372 J	430 J	520 J	580 J	481 J	601 J	190 J	594 J	434 J
Selenium	2 or SB	1500	22.0 J	0.050 UJ	0.051 UJ	0.042 UJ	0.051 UJ	0.059 UJ	0.051 UJ	0.040 UJ	0.060 UJ	0.054 UJ
Silver	SB	1500	0.015 U	0.014 U	0.014 U	0.012 U	0.014 U	0.017 U	0.014 U	0.011 U	0.017 U	0.015 U
Sodium	SB		55.7	149	18.0 B	24.9 B	118	77.2	36.2	177	57.2	57.6
Thallium	SB		0.18 B	0.13 B	0.060 U	0.050 U	0.060 U	0.079 B	0.29 B	0.047 B	0.17 B	0.22 B
Vanadium	150 or SB		21.8 J	11.2 J	13.7 J	20.7 J	20.8 J	15.9 J	20.5 J	14.5 J	19.1 J	17.5 J
Zinc	20 or SB	10000	18.5 J	29.1 J	51.6 J	71.6 J	70.2 J	54.6 J	75.5 J	1.7 J	60.6 J	157 J

Notes:

Bgs - Below ground surface

U - The analyte was not detected at the indicated quantitation limit.


J - The associated value is an approximate concentration of the analyte.


UJ - The analyte was not detected at the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.

B - A trace concentration was detected below the reporting limit and equal to or above the detection limit.

E - Estimated concentration due to presence of interference determined by serial dilution analysis.

\* - Relative percentage difference for duplicate analysis outside of control limit.

 - Concentration exceeds corresponding TAGM 4046 SCO, but not the corresponding 6 NYCRR Part 375 Commercial SCO.

 - Concentration exceeds corresponding 6 NYCRR Part 375 Commercial SCO.

**Table 5-4**  
**Summary of Soil Boring Sampling Results (Metals)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID Sample Depth (feet bgs) Date Matrix Units	NYSDEC TAGM 4046 Soil Cleanup Objective mg/kg	6 NYCRR Part 375 Draft Commercial Soil Cleanup Objectives mg/kg	ORC-SB-15 9-10 05-09-06 Soil mg/kg	ORC-SB-16 1-2 05-09-06 Soil mg/kg	ORC-SB-16 9.5-10.5 05-09-06 Soil mg/kg	ORC-SB-17 1-2 05-09-06 Soil mg/kg	ORC-SB-17 7-8 05-09-06 Soil mg/kg	ORC-SB-18 2.5-3.5 05-09-06 Soil mg/kg	ORC-SB-18 7-8 05-09-06 Soil mg/kg	ORC-SB-19 6-7 05-09-06 Soil mg/kg	ORC-SB-X2 6-7 05-09-06 Soil mg/kg
Aluminum	SB		10800	4120	10600	1170	8780	7710	11100	11900	12200
Antimony	SB		0.036 UJ	18.7 J	1.1 J	0.20 J	0.040 UJ	1.1 J	0.061 J	0.041 UJ	0.036 UJ
Arsenic	7.5 or SB	16	6.7 J	18.9 J	11.3 J	7.2 J	2.4 J	15.8 J	15.8 J	2.6 J	3.1 J
Barium	300 or SB	400	30.6 *	49.1 *	43.8 *	3.9 B*	46.8 *	23.5 *	45.2 *	35.4 *	34.8 *
Beryllium	0.16 or SB	590	0.49	0.51	0.56	0.51	0.37	0.34	0.69	0.46	0.50
Cadmium	1 or SB	9.3	0.35 J	0.85 J	0.55 J	0.077 J	0.26 J	0.41 J	0.62 J	0.33 J	0.38 J
Calcium	SB		949	4430	3990	103000	30100	71400	2740	1210	1770
Chromium	10 or SB	400	13.8 J	12.1 J	14.8 J	1.2 J	12.5 J	11.6 J	14.6 J	15.6 J	15.8 J
Cobalt	30 or SB		8.7 J	6.6 J	8.9 J	4.2 J	6.5 J	6.7 J	10.7 J	8.1 J	8.2 J
Copper	25 or SB	270	12.8	117	26.4	4.7	11.7	27.0	18.0	16.3	16.8
Iron	2000 or SB		22300	36300	33200	5740	17600	19700	32300	19800	20900
Lead	SB	1000	12.2 J	734 J	114 J	2.1 J	11.1 J	78.2 J	12.4 J	12.3 J	12.6 J
Magnesium	SB		3320 J	725 J	3140 J	3090 J	4780 J	3640 J	3060 J	3150 J	3250 J
Manganese	SB	10000	308 J	186 J	203 J	60.6 J	194 J	145 J	263 J	175 J	183 J
Mercury	0.1	2.8	0.017 B	0.060 B	0.033 B	0.0064 B	0.031 B	0.029 B	0.025 B	0.041 B	0.041 B
Nickel	13 or SB	310	22.1 J	17.4 J	22.2 J	7.7 J	18.3 J	15.9 J	23.4 J	23.0 J	23.5 J
Potassium	SB		379 J	373 J	481 J	193 J	429 J	509 J	353 J	395 J	394 J
Selenium	2 or SB	1500	0.043 UJ	0.050 UJ	0.050 UJ	0.044 UJ	0.047 UJ	0.040 UJ	0.042 UJ	0.049 UJ	0.043 UJ
Silver	SB	1500	0.012 U	0.014 U	0.014 U	0.013 U	0.013 U	0.011 U	0.012 U	0.014 U	0.012 U
Sodium	SB		17.1	63.9	39.8	94.1	42.0	66.2	21.2	75.6	76.0
Thallium	SB		0.095 B	0.44 B	0.38 B	0.052 B	0.10 B	0.047 B	0.30 B	0.16 B	0.21 B
Vanadium	150 or SB		17.8 J	15.1 J	18.8 J	60.0 J	15.9 J	15.2 J	17.6 J	16.2 J	16.6 J
Zinc	20 or SB	10000	58.6 J	48.5 J	70.6 J	6.2 J	44.2 J	46.1 J	60.9 J	89.7 J	93.9 J

Notes:

Bgs - Below ground surface

U - The analyte was not detected at the indicated quantitation limit.


J - The associated value is an approximate concentration of the analyte.


UJ - The analyte was not detected at the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.

B - A trace concentration was detected below the reporting limit and equal to or above the detection limit.

E - Estimated concentration due to presence of interference determined by serial dilution analysis.

\* - Relative percentage difference for duplicate analysis outside of control limit.

 - Concentration exceeds corresponding TAGM 4046 SCO, but not the corresponding 6 NYCRR Part 375 Commercial SCO.

 - Concentration exceeds corresponding 6 NYCRR Part 375 Commercial SCO.

**Table 5-5**  
**Summary of Surface Soil Sampling Results (Metals)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID Sample Depth (inches bgs) Date Matrix Units	NYSDEC TAGM 4046 Soil Cleanup Objective mg/kg	6 NYCRR Part 375 Draft Commercial Soil Cleanup Objectives mg/kg	ORC-SS-01 0-2 04-27-06 Soil mg/kg	ORC-SS-02 0-2 04-27-06 Soil mg/kg	ORC-SS-03 0-2 04-27-06 Soil mg/kg	ORC-SS-04 0-2 04-27-06 Soil mg/kg	ORC-SS-05 0-2 04-27-06 Soil mg/kg	ORC-SS-06 0-2 04-27-06 Soil mg/kg	ORC-SS-X 0-2 04-27-06 Soil mg/kg	ORC-SS-07 0-2 04-27-06 Soil mg/kg	ORC-SS-08 0-2 05-01-06 Soil mg/kg	ORC-SS-09 0-2 05-02-06 Soil mg/kg
Aluminum	SB		3290	1380	6490	5130	12600	2410	2370	10700	10600	3550
Antimony	SB		2.4 J	1.2 J	5.7 J	11.4 J	0.12 J	3.3 J	3.1 J	0.48 J	0.046 UJ	3.5 J
Arsenic	7.5 or SB	16	12.3 J	10.9 J	24.8 J	14.9 J	8.2 J	13.7 J	16.8 J	7.2 J	10.3	9.8 J
Barium	300 or SB	400	78.0 J	24.9 J	35.0 J	105 J	39.4 J	68.8 J	70.2 J	57.5 J	44.8 E	68.7 J
Beryllium	0.16 or SB	590	0.41 J	0.35 J	0.28 J	0.33 J	0.44 J	0.46 J	0.49 J	0.43 J	0.44	0.32 J
Cadmium	1 or SB	9.3	0.43 J	0.28 J	2.1 J	4.2 J	0.49 J	0.34 J	0.31 J	0.97 J	0.64 E	1.2 J
Calcium	SB		6720	512	73500	10700	461	553	672	4070	32200 *	3880 *
Chromium	10 or SB	400	10.6 J	11.1 J	15.0 J	137 J	15.3 J	8.8 J	8.3 J	17.1 J	14.5 J	10.0 J
Cobalt	30 or SB		4.7 J	2.9 J	12.9 J	12.2 J	9.1 J	3.8 J	3.9 J	8.6 J	9.5 J	3.4 J
Copper	25 or SB	270	120	41.0	216	200	14.3	79.5	76.9	43.0	15.9	263
Iron	2000 or SB		10800 E	10300 E	117000 E	86700 E	21500 E	29500 E	18100 E	26700 E	24700	18900
Lead	SB	1000	260 J	63.3 J	73.5 J	1490 J	16.1 J	215 J	220 J	71.0 J	20.9 J	164 J
Magnesium	SB		1090 J	168 J	2380 J	2760 J	2970 J	400 J	395 J	2930 J	6560 J	465 J
Manganese	SB	10000	101 J	58.0 J	352 J	660 J	435 J	81.3 J	82.0 J	383 J	482 J	90.2 J
Mercury	0.1	2.8	0.11	0.076	0.053	0.17	0.053	0.094	0.089	0.095	0.055	0.059
Nickel	13 or SB	310	13.8 J	9.4 J	63.8 J	46.2 J	21.6 J	10.1 J	10.2 J	28.3 J	22.1 J	13.0 J
Potassium	SB		440 J	158 J	473 J	671 J	461 J	351 J	378 J	571 J	621 J	694 J
Selenium	2 or SB	1500	4 J	4.4 J	1.3 J	4.1 J	2.9 J	5.0 J	4.8 J	2.3 J	0.054 UJ	1.2 J
Silver	SB	1500	0.12 B	0.10 B	0.011 U	0.014 U	0.012 U	0.050 B	0.054 B	0.012 U	0.016 U	0.16 B
Sodium	SB		74.9	16.5 B	57.1	144	17.7 B	27.9 B	30.1 B	49.4	125	71.8
Thallium	SB		0.062 UJ	0.059 UJ	0.046 UJ	0.060 UJ	0.051 UJ	0.054 UJ	0.051 UJ	0.050 UJ	0.064 U	0.11 B
Vanadium	150 or SB		15.1 J	18.6 J	27.3 J	65.8 J	17.2 J	17.8 J	17.3 J	17.1 J	19.9 J	15.6 J
Zinc	20 or SB	10000	80.5 J	25.0 J	62.3 J	676 J	66.5 J	23.5 J	23.7 J	194 J	57.1 J	140 J

Notes:

Bgs - Below ground surface

U - The analyte was not detected at the indicated quantitation limit.

J - The associated value is an approximate concentration of the analyte.

UJ - The analyte was not detected at the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.

B - A trace concentration was detected below the reporting limit and equal to or above the detection limit.

E - Estimated concentration due to presence of interference determined by serial dilution analysis.

\* - Relative percentage difference for duplicate analysis outside of control limit.

N - Matrix spike recovery outside of the control limit

- Concentration exceeds corresponding TAGM 4046 SCO, but not the corresponding 6 NYCRR Part 375 Commercial SCO.

- Concentration exceeds corresponding 6 NYCRR Part 375 Commercial SCO.



**Table 5-5  
Summary of Surface Soil Sampling Results (Metals)  
USEPA Brownfields Assessment Program  
Former D&H Rail Yard, Oneonta River Corporation Properties  
Oneonta, New York**

Sample ID Sample Depth (inches bgs) Date Matrix Units	NYSDEC TAGM 4046 Soil Cleanup Objective mg/kg	6 NYCRR Part 375 Draft Commercial Soil Cleanup Objectives mg/kg	ORC-SS-10 0-2 05-03-06 Soil mg/kg	ORC-SS-11 0-2 05-03-06 Soil mg/kg	ORC-SS-12 0-2 05-04-06 Soil mg/kg	ORC-SS-13 0-2 05-04-06 Soil mg/kg	ORC-SS-14 0-2 05-04-06 Soil mg/kg	ORC-SS-15 0-2 05-08-06 Soil mg/kg	ORC-SS-16 0-2 05-09-06 Soil mg/kg	ORC-SS-17 0-2 05-10-06 Soil mg/kg	ORC-SS-18 0-2 06-05-06 Soil mg/kg
Aluminum	SB		3310	3570 E	18800 E	13300 E	10400	13200	7390	10900	11200
Antimony	SB		1.1 UJ	0.96 J	1.0 J	0.59 J	0.41 J	0.032 UN	0.042 BN	0.31 BN	0.3 B
Arsenic	7.5 or SB	16	20.0 J	38.9 J	15.3 J	19.1 J	12.4 J	13.0 N	7.0 N	10.8 N	11.4
Barium	300 or SB	400	63.8 J	45.3 J	119 J	45.8 J	116 J	24.5 *	30.0 *	32.6 *	43.6
Beryllium	0.16 or SB	590	0.31 J	0.35 J	0.82 J	0.54 J	0.40 J	0.53	0.30	0.31	0.49 B
Cadmium	1 or SB	9.3	0.46 J	0.27 J	0.50 J	0.57 J	0.70 J	0.74 *E	0.42 *E	0.37 *E	0.18
Calcium	SB		1650 *	1110 E	1390 E	1970 E	7280	5460 *	130000 *	1640 *	1070
Chromium	10 or SB	400	8.8 J	9.7 J	24.5 J	17.7 J	14.4 J	18.9 *	9.7 *	12.5 *	16
Cobalt	30 or SB		4.8 J	3.0 J	15.0 J	11.3 J	6.3 J	11.7 J	5.7 J	6.5 J	10.3
Copper	25 or SB	270	31.6	65.0	22.9	22.2	22.3	20.0 *	12.5 *	8.0 *	19
Iron	2000 or SB		22300	24700	38800	36200	22000	33400 *	19400 *	21600 *	37900
Lead	SB	1000	39.5 J	52.7 J	17.9 J	18.7 J	83.5 J	16.2 J	11.0 J	16.1 J	25.4
Magnesium	SB		875 J	881 J	5120 J	4160 J	2180 J	4690 J	6390 J	2300 J	3220
Manganese	SB	10000	114 J	120 J	467 J	631 J	602 J	464 *E	337 *E	215 *E	862
Mercury	0.1	2.8	0.050	0.093	0.035 B	0.037	0.20	0.034	0.019 B	0.047	0.017 B
Nickel	13 or SB	310	9.6 J	8.3 J	37.7 J	28.1 J	16.8 J	29.8 *	14.5 *	14.8 *	24.5
Potassium	SB		363 J	362 J	1450 J	579 J	878 J	624	536	308	589
Selenium	2 or SB	1500	0.70 J	4.3 J	0.066 UJ	0.048 UJ	0.60 J	0.038 UN	0.039 UN	0.044 UN	2.1
Silver	SB	1500	0.016 U	0.016 U	0.019 U	0.014 U	0.022 U	0.011 U	0.011 U	0.012 U	0.012 U
Sodium	SB		72.0	37.8 B	36.5 B	23.3 B	33.5 B	33.4	81.0	83.6	25.7 B
Thallium	SB		0.41 B	0.35 B	0.078 U	0.057 U	0.21 B	0.045 UN	0.046 UN	0.14 BN	0.72
Vanadium	150 or SB		21.6 J	17.3 J	28.2 J	22.3 J	27.0 J	21.1 J	13.1 J	18.3 J	17.2
Zinc	20 or SB	10000	29.4 J	27.7 J	82.3 J	80.2 J	115 J	80.6 J	40.2 J	51.6 J	71.6

Notes:

Bgs - Below ground surface

U - The analyte was not detected at the indicated quantitation limit.

J - The associated value is an approximate concentration of the analyte.

UJ - The analyte was not detected at the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.

B - A trace concentration was detected below the reporting limit and equal to or above the detection limit.

E - Estimated concentration due to presence of interference determined by serial dilution analysis.

\* - Relative percentage difference for duplicate analysis outside of control limit.

N - Matrix spike recovery outside of the control limit

  - Concentration exceeds corresponding TAGM 4046 SCO, but not the corresponding 6 NYCRR Part 375 Commercial SCO.

  - Concentration exceeds corresponding 6 NYCRR Part 375 Commercial SCO.

**Table 5-6  
 Summary of Surface Soil Sampling Results (PCBs)  
 USEPA Brownfields Assessment Program  
 Former D&H Rail Yard, Oneonta River Corporation Properties  
 Oneonta, New York**

<b>Sample ID Sample Depth (inches bgs) Date Matrix Units</b>	<b>NYSDEC TAGM 4046 Soil Cleanup Objective ug/kg</b>	<b>ORC-SS-01 0-2 04-27-06 Soil ug/kg</b>
Aroclor-1016		43 U
Aroclor-1221		43 U
Aroclor-1232		43 U
Aroclor-1242		43 U
Aroclor-1248		43 U
Aroclor-1254		43 U
Aroclor-1260		43 U
Total PCBs	1,000	

Notes:

Bgs - Below ground surface

U - The analyte was not detected at the indicated quantitation limit



**Table 5-7**  
**Summary of Sediment Sampling Results (SVOCs)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID Sample Depth (feet bgs) Sampling Date Matrix Units	NYSDEC TAGM 4046 Soil Cleanup Objective ug/kg	6 NYCRR Part 375 Draft Commercial Soil Cleanup Objective ug/kg	ORC-SD-01 0-0.5 04-27-06 Sediment ug/kg	ORC-SD-02 0-0.7 04-27-06 Sediment ug/kg	ORC-SD-03 0-0.8 04-27-06 Sediment ug/kg	ORC-SD-04 0-0.7 04-27-06 Sediment ug/kg	ORC-SD-05 0-0.8 04-27-06 Sediment ug/kg	ORC-SD-06 0-0.5 04-27-06 Sediment ug/kg	ORC-SD-07 0-0.2 04-27-06 Sediment ug/kg	ORC-SD-08 0-0.4 04-27-06 Sediment ug/kg
2,4-Dinitrophenol	200		2800 UJ	1000 R	2600 UJ	12000 UJ	1700 UJ	1800 UJ	1000 U	900 U
2-Methylnaphthalene	36400		1400 UJ	520 U	1300 UJ	5700 UJ	820 UJ	880 UJ	260 J	440 U
3,3-Dichlorobenzidine			1400 UJ	520 R	1300 UJ	5700 UJ	820 UJ	880 UJ	500 U	440 U
4,6-Dinitro-2-methylphenol			2800 UJ	1000 R	2600 UJ	12000 UJ	1700 UJ	1800 UJ	1000 U	900 U
4-Methylphenol	900		180 J	520 U	1300 UJ	5700 UJ	820 UJ	880 UJ	500 U	440 U
Acenaphthene	50000	500000	150 J	110 J	1300 UJ	5700 UJ	820 UJ	880 UJ	500 U	87 J
Acenaphthylene	41000	500000	290 J	150 J	460 J	5700 UJ	120 J	880 UJ	500 U	210 J
Anthracene	50000	500000	530 J	380 J	500 J	5700 UJ	120 J	880 UJ	500 U	320 J
Benzo(a)anthracene	224	5600	1800 J	1700 J	2400 J	2000 J	540 J	140 J	84 J	1300 J
Benzo(a)pyrene	61	1000	1500 J	1700 J	2600 J	2000 J	600 J	880 UJ	70 J	1400 J
Benzo(b)fluoranthene	1100	5600	2600 J	3000 J	5200 J	4000 J	1100 J	300 J	120 J	1900 J
Benzo(g,h,i)perylene	50000	500000	1000 J	950 J	1500 J	1700 J	410 J	880 UJ	500 U	810 J
Benzo(k)fluoranthene	1100	56000	760 J	850 J	1500 J	1100 J	270 J	140 J	500 U	810 J
bis(2-Ethylhexyl)phthalate	50000		900 J	860 J	550 J	1100 J	290 J	330 J	170 J	430 J
Carbazole			230 J	210 J	290 J	5700 UJ	820 UJ	880 UJ	500 U	130 J
Chrysene	400	56000	1600 J	2100 J	3300 J	2100 J	680 J	220 J	110 J	1400 J
Dibenzo(a,h)anthracene	14	560	280 J	280 J	420 J	5700 UJ	820 UJ	880 UJ	500 U	230 J
Dibenzofuran	6200		1400 UJ	66 J	1300 UJ	5700 UJ	820 UJ	880 UJ	62 J	53 J
Dimethylphthalate	2000		1400 UJ	420 J	1300 UJ	5700 UJ	820 UJ	880 UJ	500 U	440 U
Fluoranthene	50000	500000	3000 J	5100 J	6500 J	4200 J	1200 J	320 J	140 J	3500 J
Fluorene	50000	500000	190 J	130 J	180 J	5700 UJ	820 UJ	880 UJ	500 U	130 J
Hexachlorocyclopentadiene			1400 UJ	520 R	1300 UJ	5700 UJ	820 UJ	880 UJ	500 UJ	440 UJ
Indeno(1,2,3-cd)pyrene	3200	5600	940 J	900 J	1500 J	1600 J	380 J	880 UJ	500 U	720 J
Naphthalene	13000	500000	1400 UJ	520 U	1300 UJ	5700 UJ	820 UJ	880 UJ	160 J	440 U
Phenanthrene	50000	500000	1600 J	2200 J	2000 J	1700 J	570 J	220 J	180 J	1700 J
Pyrene	50000	500000	2600 J	3300 J	4000 J	3500 J	1100 J	480 J	120 J	2600 J

Notes:

Bgs - Below ground surface

U - The analyte was not detected at the indicated quantitation limit.

J - The associated value is an approximate concentration of the analyte.

UJ - The analyte was not detected at the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.

R - The sample results are rejected. Presence or absence of the analyte can not be verified

- Concentration exceeds corresponding TAGM 4046 SCO, but not the 6NYCRR Part 375 Commercial SCO.

- Concentration exceeds corresponding 6 NYCRR Part 375 Commercial SCO.

**Table 5-8**  
**Summary of Sediment Sampling Results (Metals)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID Sample Depth (feet bgs) Date Matrix Units	NYSDEC TAGM 4046 Soil Cleanup Objective mg/kg	6 NYCRR Part 375 Draft Commercial Soil Cleanup Objectives mg/kg	ORC-SD-01 0-0.5 04-27-06 Sediment mg/kg	ORC-SD-02 0-0.7 04-27-06 Sediment mg/kg	ORC-SD-03 0-0.8 04-27-06 Sediment mg/kg	ORC-SD-04 0-0.7 04-27-06 Sediment mg/kg	ORC-SD-05 0-0.8 04-27-06 Sediment mg/kg	ORC-SD-06 0-0.5 04-27-06 Sediment mg/kg	ORC-SD-07 0-0.2 04-27-06 Sediment mg/kg	ORC-SD-08 0-0.4 04-27-06 Sediment mg/kg
Aluminum	SB		13600 J	8610	12400 J	8910 J	12700 J	13400 J	8490	10500
Antimony	SB		1.7 J	0.30 J	283 J	2.8 J	0.18 J	0.50 J	2.2 J	0.096 J
Arsenic	7.5 or SB	16	16.3 J	8.6 J	18.0 J	34.1 J	5.2 J	11.0 J	6.8 J	6.5 J
Barium	300 or SB	400	189 J	39.8 J	126 J	129 J	87.9 J	96.4 J	45.8 J	53.0 J
Beryllium	0.16 or SB	590	0.69 J	0.34 J	0.64 J	0.66 J	0.49 J	0.62 J	0.43 J	0.42 J
Cadmium	1 or SB	9.3	1.6 J	0.73 J	1.2 J	1.1 J	0.73 J	0.34 J	0.79 J	0.58 J
Calcium	SB		6230 J	83900	8140 J	2630 J	4860 J	3300 J	1510	2370
Chromium	10 or SB	400	31.8 J	29.6 J	32.2 J	19.9 J	17.3 J	14.5 J	13.0 J	17.1 J
Cobalt	30 or SB		24.7 J	6.1 J	8.5 J	12.3 J	7.3 J	4.7 J	7.1 J	9.0 J
Copper	25 or SB	270	53.1 J	35.8 J	692 J	117 J	31.4 J	19.0 J	43.1 J	16.1 J
Iron	2000 or SB		68400 J	28200 E	25900 J	45600 J	17200 J	15200 J	29800 E	27900 E
Lead	SB	1000	163 J	85.7 J	6850 J	135 J	58.1 J	90.6 J	109 J	43.4 J
Magnesium	SB		4020 J	11700 J	2880 J	2260 J	2560 J	1350 J	2380 J	3250 J
Manganese	SB	10000	739 J	336 J	205 J	346 J	620 J	124 J	173 J	633 J
Mercury	0.1	2.8	0.20 J	0.060	0.30 J	0.22 J	0.16 J	0.19 J	0.036 B	0.033 B
Nickel	13 or SB	310	35.5 J	17.8 J	30.6 J	28.1 J	20.2 J	14.8 J	19.5 J	24.0 J
Potassium	SB		1210 J	606 J	977 J	828 J	753 J	633 J	481 J	429 J
Selenium	2 or SB	1500	8.0 J	4.0 J	4.8 J	8.5 J	3.0 J	4.1 J	3.6 J	2.2 J
Silver	SB	1500	0.15 J	0.016 U	0.93 J	0.15 J	0.11 J	0.20 J	0.095 B	0.013 U
Sodium	SB		603 J	170	291 J	129 J	93.0 J	36.5 J	39.2 B	86.9
Thallium	SB		0.19 UJ	0.065 UJ	0.16 UJ	0.14 UJ	1.5 J	0.14 UJ	0.072 UJ	0.84 J
Vanadium	150 or SB		33.7 J	19.1 J	27.4 J	20.9 J	18.2 J	28.5 J	14.8 J	17.0 J
Zinc	20 or SB	10000	462 J	166 J	294 J	178 J	151 J	54.7 J	376 J	140 J

Notes:

Bgs - Below ground surface


U - The analyte was not detected at the indicated quantitation limit.


J - The associated value is an approximate concentration of the analyte.

UJ - The analyte was not detected at the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.

B - A trace concentration was detected below the reporting limit and equal to or above the detection limit.

E - Estimated concentration due to presence of interference determined by serial dilution analysis.

 - Concentration exceeds corresponding TAGM 4046 SCO, but not the 6NYCRR Part 375 Commercial SCO.

 - Concentration exceeds corresponding 6 NYCRR Part 375 Commercial SCO.

**Table 5-9**  
**Summary of Groundwater Sampling Results (VOCs and SVOCs)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID Sampling Date Matrix Units	NYSDEC Class GA Standard ug/L	ORC-MW-01 05-22-06 Water ug/L	ORC-MW-02 05-22-06 Water ug/L	ORC-MW-03 05-22-06 Water ug/L	ORC-MW-04 05-22-06 Water ug/L	ORC-MW-05 05-22-06 Water ug/L	ORC-MW-X 05-22-06 Water ug/L	ORC-MW-06 05-23-06 Water ug/L	ORC-MW-07 05-22-06 Water ug/L	ORC-MW-08 05-23-06 Water ug/L	ORC-MW-09 05-24-06 Water ug/L
<b>VOCs</b>											
1,2,4-Trimethylbenzene	5	5 U	5 U	5 U	5 U	5 U	5 U	7	5 U	5 U	5 U
1,3,5-Trimethylbenzene	5	5 U	5 U	5 U	5 U	5 U	5 U	3 J	5 U	5 U	5 U
4-Isopropyltoluene	5	5 U	5 U	5 U	5 U	5 U	5 U	2 J	5 U	5 U	5 U
4-Methyl-2-pentanone		5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U
Acetone		5 U	5 U	5 U	5 U	5 U	3 J	5 U	5 U	5 U	5 U
Hexachlorobutadiene		5 U	5 U	5 U	5 U	5 U	5 U	1 JB	5 U	5 U	5 U
Isopropylbenzene	5	5 U	5 U	5 U	5 U	5 U	5 U	6	5 U	5 U	5 U
m,p-Xylene	5	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U
Methyl tert-butyl ether	10	5 U	5 U	12	5 U	5 U	5 U	5 U	5 U	5 U	5 U
Naphthalene		5 U	5 U	5 U	5 U	5 U	5 U	81 B	5 U	2 JB	5 U
n-Propylbenzene	5	5 U	5 U	5 U	5 U	5 U	5 U	3 J	5 U	5 U	5 U
o-Xylene		5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U
sec-Butylbenzene	5	5 U	5 U	5 U	5 U	5 U	5 U	3 J	5 U	5 U	5 U
Styrene		5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U
Xylene (Total)		5 U	5 U	5 U	5 U	5 U	5 U	5	5 U	5 U	5 U
<b>SVOCs</b>											
2,4-Dimethylphenol	1	10 U	10 U	10 U	10 U	10 U	10 U	10 R	10 U	10 R	10 R
2-Methylnaphthalene		10 U	10 U	10 U	10 U	10 U	10 U	24	10 U	10 U	10 U
Acenaphthene		10 U	10 U	10 U	10 U	10 U	10 U	2 J	10 U	10 U	10 U
bis(2-Ethylhexyl)phthalate	50	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Dibenzofuran		10 U	10 U	10 U	10 U	10 U	10 U	1 J	10 U	10 U	10 U
Fluorene	50	10 U	10 U	10 U	10 U	10 U	10 U	2 J	10 U	10 U	10 U
Hexachlorocyclopentadiene		10 UJ	10 UJ	10 UJ	10 UJ	10 UJ	10 UJ	10 UJ	10 UJ	10 UJ	10 UJ
Naphthalene	10	10 U	10 U	10 U	10 U	10 U	10 U	17	10 U	10 U	10 U

Notes:

U - The analyte was not detected at the indicated quantitation limit.

J - The associated value is an approximate concentration of the analyte in the sample.

B - A trace concentration was detected below the reporting limit and equal to or above the detection limit

UJ - The analyte was not detected at the reported sample quantitation limit.

However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.

R - The sample results are rejected. The presence or absence of the analyte can not be verified.

     - Concentration exceeds corresponding NYSDEC Class GA Standard.

**Table 5-9**  
**Summary of Groundwater Sampling Results (VOCs and SVOCs)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID Sampling Date Matrix Units	NYSDEC Class GA Standard ug/L	ORC-MW-10 05-24-06 Water ug/L	ORC-MW-11 05-23-06 Water ug/L	ORC-MW-12 05-24-06 Water ug/L	ORC-MW-13 05-24-06 Water ug/L	ORC-MW-14 05-24-06 Water ug/L
<b>VOCs</b>						
1,2,4-Trimethylbenzene	5	5 U	5 U	5 U	5 U	5 U
1,3,5-Trimethylbenzene	5	5 U	5 U	5 U	5 U	5 U
4-Isopropyltoluene	5	5 U	5 U	5 U	5 U	5 U
4-Methyl-2-pentanone		5 U	5 U	5 U	5 U	5 U
Acetone		5 U	5 U	5 U	5 U	5 U
Hexachlorobutadiene		5 U	5 U	5 U	5 U	5 U
Isopropylbenzene	5	5 U	5 U	5 U	5 U	5 U
m,p-Xylene	5	5 U	5 U	5 U	5 U	5 U
Methyl tert-butyl ether	10	5 U	5 U	5 U	5 U	5 U
Naphthalene		5 U	5 U	5 U	5 U	5 U
n-Propylbenzene	5	5 U	5 U	5 U	5 U	5 U
o-Xylene		5 U	5 U	5 U	5 U	5 U
sec-Butylbenzene	5	5 U	5 U	5 U	5 U	5 U
Styrene		5 U	5 U	5 U	5 U	5 U
Xylene (Total)		5 U	5 U	5 U	5 U	5 U
<b>SVOCs</b>						
2,4-Dimethylphenol	1	10 R	10 R	10 R	10 R	10 R
2-Methylnaphthalene		10 U	10 U	10 U	10 U	10 U
Acenaphthene		10 U	10 U	10 U	10 U	10 U
bis(2-Ethylhexyl)phthalate	50	1 J	10 U	10 U	10 U	10 U
Dibenzofuran		10 U	10 U	10 U	10 U	10 U
Fluorene	50	10 U	10 U	10 U	10 U	10 U
Hexachlorocyclopentadiene		10 UJ	10 UJ	10 UJ	10 UJ	10 UJ
Naphthalene	10	10 U	10 U	10 U	10 U	10 U

Notes:

U - The analyte was not detected at the indicated quantitation limit.

J - The associated value is an approximate concentration of the analyte in the sample.

B - A trace concentration was detected below the reporting limit and equal to or above the detection limit.

UJ - The analyte was not detected at the reported sample quantitation limit.

However, the reported limit is approximate and may or may not represent the quantitation limit necessary to measure the analyte in the sample.

R - The sample results are rejected. The presence or absence of the analyte can not be verified.

     - Concentration exceeds corresponding NYSDEC Class GA Standard.

**Table 5-10**  
**Summary of Groundwater Sampling Results (Metals)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID	NYSDEC	ORC-MW-01	ORC-MW-02	ORC-MW-03	ORC-MW-04	ORC-MW-05	ORC-MW-X	ORC-MW-06	ORC-MW-07	ORC-MW-08	ORC-MW-09
Matrix Date Units	Class GA Standard ug/L	Water 05-22-06 ug/L	Water 05-22-06 ug/L	Water 05-22-06 ug/L	Water 05-22-06 ug/L	Water 05-22-06 ug/L	Water 05-22-06 ug/L	Water 05-23-06 ug/L	Water 05-22-06 ug/L	Water 05-23-06 ug/L	Water 05-24-06 ug/L
Aluminum		19.5 B	137 B	164 B	825	32.5 B	22.0 B	294	2230	1770	36.0 B
Antimony		4.9 B	3.0 B	1.8 B	2.8 B	1.2 U	1.2 U	1.2 U	2.4 B	3.1 B	2.7 B
Arsenic	25	4.5 B	7.0 B	1.6 U	7.0 B	1.6 U	1.6 U	2.9 B	1.6 U	1.6 U	1.6 U
Barium	1000	70.0 B	211	34.8 B	39.3 B	12.3 B	12.3 B	97.5 B	24.0 B	16.3 B	44.0 B
Beryllium		0.20 B	0.17 B	0.15 U	0.18 B	0.15 U	0.15 U	0.15 U	0.39 B	0.15 U	0.15 U
Cadmium	5	0.19 B	0.20 B	0.11 B	0.23 B	0.10 U	0.10 U	0.27 B	0.71 B	0.10 U	0.10 U
Calcium	50	51200	44400	32400	38200	60800	61500	16000	19100	6130	27600
Chromium		0.40 B	0.72 B	0.65 B	2.4 B	0.38 U	0.72 B	2.0 B	0.44 B	1.3 B	0.50 B
Cobalt		0.77 B	1.0 B	0.44 B	2.3 B	0.22 B	0.23 B	1.9 B	38.5 B	0.84 B	0.65 B
Copper		8.2 B	6.5 B	7.6 B	8.0 B	6.3 U	6.3 U	6.3 U	11.2 B	6.3 U	6.3 U
Iron		8130	14200	246	5590	80.3 B	70.9 B	35800	20800	1290	60.1 B
Lead	25	0.77 B	0.64 B	0.46 U	1.5 B	0.46 U	0.46 U	2.8 B	1.6 B	1.4 B	0.46 U
Magnesium		4920	6470	6630	2400	6120	6200	4560	14900	1900	5070
Manganese		871	1150	27.6 B	941	10.9 B	11.9 B	7050	1300	38.5 B	4.8 B
Mercury	0.7	0.065 U	0.065 U	0.066 U	0.066 U	0.066 U	0.065 U	0.066 U	0.065 U	0.066 U	0.066 U
Nickel		1.1 B	1.2 B	2.0 B	2.2 B	0.59 U	0.59 U	2.0 B	111	1.3 B	1.2 B
Potassium		4240	3770	1630	2600	928 B	943 B	721 B	4790	870 B	2580
Selenium	10	0.98 U	5.1 B	0.98 U	5.0 B	4.0 B	0.98 U	0.98 U	3.0 B	2.3 B	3.1 B
Silver	50	1.5 B	0.95 B	0.91 U	0.91 U	0.91 U	0.91 U	1.3 B	0.94 B	0.91 U	0.91 U
Sodium		100000	55800	57000	795 B	14800	15300	2450	7970	9380	88000
Thallium		1.2 U	1.2 U	2.5 B	1.2 U	2.3 B	2.9 B	1.2 U	1.2 U	1.2 U	2.2 B
Vanadium		1.9 B	3.4 B	0.81 B	7.3 B	0.48 B	0.47 U	7.2 B	3.7 B	1.6 B	0.47 U
Zinc		18.9 B	17.4 B	16.6 B	27.3 B	16.3 B	18.9 B	17.9 B	227	19.3 B	19.5 B

Notes:

U - The analyte was not detected a the indicated quantitation limit

J - The associated value is an approximate concentration of the analyte in the sample

B - A trace concentration was detected below the reporting limit and equal to or above the detection limit

N - Matrix spike recovery outside of the control limit

E - Estimated concentration due to presence of interference determined by serial dilution analysis

\* - Relative percentage difference for duplicate analysis outside of control limit

     - Concentration exceeds corresponding NYSDEC Class GA Standard

**Table 5-10**  
**Summary of Groundwater Sampling Results (Metals)**  
**USEPA Brownfields Assessment Program**  
**Former D&H Rail Yard, Oneonta River Corporation Properties**  
**Oneonta, New York**

Sample ID	NYSDEC	ORC-MW-10	ORC-MW-10	ORC-MW-11	ORC-MW-12	ORC-MW-13	ORC-MW-14
Matrix Date Units	Class GA Standard ug/L	Water 05-24-06 ug/L	Water 05-24-06 ug/L	Water 05-23-06 ug/L	Water 05-24-06 ug/L	Water 05-24-06 ug/L	Water 05-24-06 ug/L
Aluminum		5010	16.2 B	46.4 B	111 B	166 B	128 B
Antimony		1.2 U	3.7 B	1.2 U	4.6 B	1.9 B	2.1 B
Arsenic	25	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	10.5 B
Barium	1000	35.2 B	8.0 B	17.6 B	82.7 B	31.7 B	233
Beryllium		0.17 B	0.15 U	0.15 U	0.15 U	0.15 U	0.15 U
Cadmium	5	0.27 B	0.15 B	0.10 U	0.10 U	0.21 B	0.22 B
Calcium	50	25000	23800	51300	74500	40900	53100
Chromium		8.5 B	0.90 B	0.38 U	0.56 B	0.59 B	0.45 B
Cobalt		3.4 B	0.63 B	0.72 B	0.85 B	4.8 B	2.7 B
Copper		6.3 U	6.3 U	6.3 U	6.3 U	6.3 U	6.3 U
Iron		7730	19.3 B	133 B	8090	298	40400
Lead	25	6.1 B	0.46 U	0.46 U	0.72 B	0.46 U	2.5 B
Magnesium		7490	6410	8040	10400	4370	6580
Manganese		165	4.9 B	1660	2110	128	1980
Mercury	0.7	0.066 U	0.066 U	0.065 U	0.066 U	0.066 U	0.066 U
Nickel		7.8 B	0.86 B	1.1 B	1.4 B	7.4 B	1.4 B
Potassium		1960	931 B	1580	3140	2430	3100
Selenium	10	1.5 B	1.4 B	4.0 B	0.98 U	2.8 B	0.98 U
Silver	50	0.91 U	0.91 U	0.91 U	0.91 U	0.91 U	0.91 U
Sodium		14000	13700	13200	14600	3150	9140
Thallium		3.2 B	3.0 B	1.2 U	1.2 U	2.1 B	1.2 U
Vanadium		9.4 B	0.47 U	0.47 U	1.8 B	0.78 B	6.6 B
Zinc		34.8 B	18.6 B	13.3 B	15.1 B	29.5 B	12.3 B

Notes:

U - The analyte was not detected a the indicated quantitation limit

J - The associated value is an approximate concentration of the analyte in the sample

B - A trace concentration was detected below the reporting limit and equal to or above the detection limit

N - Matrix spike recovery outside of the control limit

E - Estimated concentration due to presence of interference determined by serial dilution analysis

\* - Relative percentage difference for duplicate analysis outside of control limit

     - Concentration exceeds corresponding NYSDEC Class GA Standard

## **APPENDIX A**

### Soil Boring Logs

PROJECT USEPA Brownfields

LOCATION ORC Properties, Oneonta, NY

SHEET 1 OF 1

CLIENT

PROJECT No. 1185013

DRILLING CONTRACTOR SJB

MEAS. PT. ELEV.

PURPOSE Phase II ESA

GROUND ELEV.

WELL MATERIAL PVC

DATUM

DRILLING METHOD(S) HSA

SAMPLE

CORE

CASING

DRILL RIG TYPE Truck Mount

TYPE

PVC

DATE STARTED 4/29/06

GROUND WATER DEPTH 7.0'

DIA.

"

2"

DATE FINISHED 4/29/06

MEASURING POINT BGS

WEIGHT

#

DRILLER B. Bosworth

DATE OF MEASUREMENT 4/29/06

FALL

"

PIRNIE STAFF J. Wyckoff

DEPTH FT.	SAMPLE TYPE, RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
2	1.5	0-6	0.0		Brown fine sand and gravel, some silt; loose, moist.	0.5		Sample collected 0.5-1.5 ft bgs
		6-12			Brown-black coarse sand w/ some gravel; coal; loose, moist.			
		12-18			Brown silt and sand w/gravel; some coal; loose, moist.	2.0		
		6-12						
4	0.5	0-6	0.0		Black coal; some silt and fine sand.	4.0		
		0-6						
		6-12						
		6-12						
6	0.5	0-6	0.0		Brown med-coarse sand and gravel; saturated @ 7 ft bgs; no odors.	6.0		Sample collected 6.5-7.0 ft bgs
		6-12						
		6-12						
		6-12						
8	1.2	0-6	0.0		Gray silt and fine sand; some organics; firm, wet.	8.0		
		0-6						
		0-6						
		0-6						
10	0.5	0-6	0.0		Gray fine-med sand and gravel, some silt; bony; loose, wet.	10.0		
		6-12						
		6-12						
		6-12						
12	1.0	12-18	0.0		SAA.	12.0		
		6-12						
		12-18						
		12-18						
14						14.0		



PROJECT	USEPA Brownfields	LOCATION	ORC Properties, Oneonta, NY	SHEET 1 OF 1	
CLIENT				PROJECT No.	1185013
DRILLING CONTRACTOR	SJB				MEAS. PT. ELEV.
PURPOSE	Phase II ESA				GROUND ELEV.
WELL MATERIAL	PVC				DATUM
DRILLING METHOD(S)	HSA	SAMPLE	CORE	CASING	DATE STARTED 5/1/06
DRILL RIG TYPE	Truck Mount	TYPE		PVC	DATE FINISHED 5/1/06
GROUND WATER DEPTH	8.5'	DIA.	"	2"	DRILLER B. Bosworth
MEASURING POINT	BGS	WEIGHT	#		PIRNIE STAFF J. Wyckoff
DATE OF MEASUREMENT	5/1/06	FALL	"		

DEPTH FT.	SAMPLE TYPE RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
2	1.0	0-6	0.0		Brown fine-med sand w/ some silt and gravel; Gravel is pea-size to 1"; Moist, slightly cohesive, firm.			
		6-12						
		6-12						
4	0.5	0-6	0.0		SAA.	2.0		
		0-6						
		0-6						
6	1.0	0-6	0.0		Concrete	3.5		
		6-12						
		18-24						
8	0.0	0-6	--		No recovery, rock in bottom of split spoon.	4.0		4.5
		0-6						
		0-6						
10	1.0	0-6	0.0		Gray and reddish-brown fine sand and silt; slightly cohesive, moist.	6.0		5.5
		0-6						
		0-6						
12	1.0	0-6	0.0		SAA.	8.0		Sample collected 7.5-8.5 ft bgs ▼
		0-6						
		0-6						
14	1.0	0-6	0.0		Brown fine sand and silt w/gravel; slightly cohesive.	10.0		
		6-12						
		12-18						
16	1.8	0-6	0.0		Brown med-coarse sand and gravel; bony, loose.	12.0		
		6-12						
		12-18						
18	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
20	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
22	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
24	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
26	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
28	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
30	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
32	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
34	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
36	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
38	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
40	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
42	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
44	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
46	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
48	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
50	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
52	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
54	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
56	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
58	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
60	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
62	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
64	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
66	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
68	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
70	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
72	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
74	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
76	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
78	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
80	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
82	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
84	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
86	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
88	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
90	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
92	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
94	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
96	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
98	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						
100	0.8	0-6	0.0		Fine-med sand and silt and gravel; firm, slightly cohesive.	14.0		
		6-12						
		12-18						

PROJECT USEPA Brownfields

LOCATION ORC Properties, Oneonta, NY

SHEET 1 OF 1

CLIENT

PROJECT No. 1185013

DRILLING CONTRACTOR SJB

MEAS. PT. ELEV.

PURPOSE Phase II ESA

GROUND ELEV.

WELL MATERIAL PVC

DATUM

DRILLING METHOD(S) HSA

SAMPLE

CORE

CASING

DATE STARTED 5/2/06

DRILL RIG TYPE Truck Mount

TYPE

PVC

DATE FINISHED 5/2/06

GROUND WATER DEPTH 5.5'

DIA.

"

2"

DRILLER B. Bosworth

MEASURING POINT BGS

WEIGHT

#

PIRNIE STAFF J. Wyckoff

DATE OF MEASUREMENT 5/2/06

FALL

"

DEPTH FT.	SAMPLE TYPE, RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
2	1.3	0-6	0.0		Brown fine-med sand and gravel w/some silt; gravel 0.5-0.75"; moist, slightly cohesive.	0.5		
		0-6						
		0-6						
		0-6						
4	1.2	0-6	0.0		Reddish-brown and tan fine sand and silt. Cohesive, moist.	1.5		
		6-12						
		6-12						
6	1.0	6-12	0.0		SAA; saturated @ 5.5 ft bgs.	4.0		Collect sample 4.5-5.5 ft bgs ▼
		6-12						
		6-12						
		6-12						
8	0.7	0-6	0.0		SAA.	6.0		
		0-6						
		0-6						
10	0.8	0-6	0.0		SAA.	8.0		
		0-6						
		0-6						
12	1.2	0-6	0.0		Brown fine-med sand w/some silt; loose.	9.5		
		0-6						
		0-6						
		0-6						
12		0-6			Brown med-coarse sand and gravel; gravel up to 1"; loose.	11.5		
		0-6						
						12.0		

PROJECT <b>USEPA Brownfields</b>	LOCATION <b>ORC Properties, Oneonta, NY</b>	SHEET <b>1 OF 1</b>		
CLIENT	PROJECT No. <b>1185013</b>			
DRILLING CONTRACTOR <b>SJB</b>	MEAS. PT. ELEV.			
PURPOSE <b>Phase II ESA</b>	GROUND ELEV.			
WELL MATERIAL <b>PVC</b>	DATUM			
DRILLING METHOD(S) <b>HSA</b>	SAMPLE	CORE	CASING	DATE STARTED <b>5/2/06</b>
DRILL RIG TYPE <b>Truck Mount</b>	TYPE		<b>PVC</b>	DATE FINISHED <b>5/2/06</b>
GROUND WATER DEPTH <b>7.5'</b>	DIA.	"	<b>2"</b>	DRILLER <b>B. Bosworth</b>
MEASURING POINT <b>BGS</b>	WEIGHT	#		PIRNIE STAFF <b>J. Wyckoff</b>
DATE OF MEASUREMENT <b>5/2/06</b>	FALL	"		

DEPTH FT.	SAMPLE TYPE, RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
2	1.5	0-6	0.0		Black med sand and coal; loose, moist.	2.0		Collect sample 1-2 ft bgs
		0-6						
		0-6						
		0-6						
4	1.2	0-6	0.0		SAA.	3.5		2.5
		0-6						
		0-6						
		0-6						
6	1.0	0-6	0.0		Reddish-brown fine sand and silt, trace clay; mosit, cohesive.	4.0		3.5
		0-6						
		0-6						
		0-6						
8	1.9	0-6	0.0		Tan fine sand, trace silt; stiff.	5.5		6.0
		6-12						
		6-12						
		6-12						
10	1.5	0-6	0.0		Gray fine sand, trace silt.	8.0		7.5
		0-6						
		0-6						
		0-6						
12	1.3	0-6	0.0		SAA.	10.0		13.5
		0-6						
		0-6						
		0-6						
14	0.0	0-6	-		Gray fine sand and silt, trace clay; slightly cohesive.	11.5		14.0
		0-6						
		0-6						
		0-6						
					No recovery.	12.0		

PROJECT <b>USEPA Brownfields</b>	LOCATION <b>ORC Properties, Oneonta, NY</b>	SHEET <b>1 OF 1</b>		
CLIENT	PROJECT No. <b>1185013</b>			
DRILLING CONTRACTOR <b>SJB</b>	MEAS. PT. ELEV.			
PURPOSE <b>Phase II ESA</b>	GROUND ELEV.			
WELL MATERIAL <b>PVC</b>	DATUM			
DRILLING METHOD(S) <b>HSA</b>	SAMPLE	CORE	CASING	
DRILL RIG TYPE <b>Truck Mount</b>	TYPE		<b>PVC</b>	
GROUND WATER DEPTH <b>11.0'</b>	DIA.	"	<b>2"</b>	
MEASURING POINT <b>BGS</b>	WEIGHT	#	DRILLER <b>B. Bosworth</b>	
DATE OF MEASUREMENT <b>5/2/06</b>	FALL	"	PIRNIC STAFF <b>J. Wyckoff</b>	

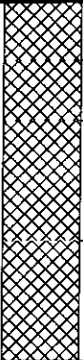
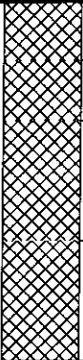
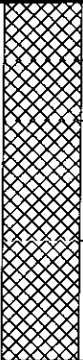

DEPTH FT.	SAMPLE TYPE RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
0-2	0.0	0-6	--		No recovery, rock in end of spoon.			
2-4	0.0	0-6	--		No recovery, brick in end of spoon.	2.0		Drill cuttings contained sand, gravel, coal, and brick from 0-6 ft bgs.
4-6	0.0	0-6	--		No recovery, rock in end of spoon.	4.0		
6-7.5	1.0	0-6 6-12 12-18 12-18	0.0		Tan and reddish-brown med-coarse sand and gravel, trace silt; gravel up to 1.5"; moist, slightly cohesive.	6.0		
7.5-8		0-6			Coal and brick.	8.0		
8-9	0.8	0-6 6-12 6-12	0.0		Brown-tan med-coarse sand and gravel, trace silt; gravel up to 1.5"; moist, slightly cohesive.	9.0		
9-10		0-6			Dark brown-black sand and gravel; coal and brick; moist.	10.0		Collect sample 10-11 ft bgs.
10-11	1.0	0-6	0.0		Brown fine-med sand, trace silt; saturated @ 11ft bgs.	11.0		
11-12		0-6			SAA.	12.0		
12-14	1.5	0-6 0-6 0-6	0.0					
14-16	1.0	0-6 0-6 0-6	0.0		Brown-tan med-coarse sand and gravel; gravel up to 1.5".	14.0		
16-17.5	1.0	0-6 0-6 0-6	0.0		SAA; sand and gravel oxidized (orange rust color) @ bottom 0.5 ft of boring.	16.0		
17.5-18		0-6				17.5		
						18.0		

# MALCOLM PIRNIE

## TEST BORING LOG

**BORING No. SB06**

PROJECT <b>USEPA Brownfields</b>	LOCATION <b>ORC Properties, Oneonta, NY</b>	SHEET <b>1</b> OF <b>1</b>		
CLIENT	PROJECT No. <b>1185013</b>			
DRILLING CONTRACTOR <b>SJB</b>	MEAS. PT. ELEV.			
PURPOSE <b>Phase II ESA</b>	GROUND ELEV.			
WELL MATERIAL <b>PVC</b>	DATUM			
DRILLING METHOD(S) <b>HSA</b>	SAMPLE	CORE	CASING	DATE STARTED <b>5/3/06</b>
DRILL RIG TYPE <b>Truck Mount</b>	TYPE		<b>PVC</b>	DATE FINISHED <b>5/3/06</b>
GROUND WATER DEPTH <b>7.5'</b>	DIA.	"	<b>2"</b>	DRILLER <b>B. Bosworth</b>
MEASURING POINT <b>BGS</b>	WEIGHT	#		PIRNIE STAFF <b>J. Wyckoff</b>
DATE OF MEASUREMENT <b>5/3/06</b>	FALL	"		

DEPTH FT.	SAMPLE TYPE, RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
1.5	0-6	0-6	0.0		Brown fine-med sand and gravel; loose, dry.	1.0		Collect sample 1-2 ft bgs
					Black med-coarse sand and coal; loose, dry.			
2	0-6	6-12	0.0		Brown fine-med sand and silt w/ gravel; some brick; mosit, slightly cohesive.	2.0		
4	0-6	0-6	0.0		Brown fine sand and silt w/ gravel; coal @ bottom of spoon; moist, cohesive.	4.0		
6	0-6	0-6	0.0		Dark brown silt and fine sand w/ little gravel; organics (twigs?); saturated @ 7.5 ft bgs.	6.0		Collect sample 6.5-7.5 ft bgs
8						8.0		

PROJECT	USEPA Brownfields	LOCATION	ORC Properties, Oneonta, NY			SHEET	1 OF 1	
CLIENT						PROJECT No.	1185013	
DRILLING CONTRACTOR	SJB						MEAS. PT. ELEV.	
PURPOSE	Phase II ESA					GROUND ELEV.		
WELL MATERIAL	PVC					DATUM		
DRILLING METHOD(S)	HSA	SAMPLE	CORE	CASING	DATE STARTED 5/3/06			
DRILL RIG TYPE	Truck Mount	TYPE		PVC	DATE FINISHED 5/3/06			
GROUND WATER DEPTH	10.0'	DIA.	"		DRILLER B. Bosworth			
MEASURING POINT	BGS	WEIGHT	#		PIRNIÉ STAFF J. Wyckoff			
DATE OF MEASUREMENT	5/3/06	FALL	"					

DEPTH FT.	SAMPLE TYPE, RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
0.0	1.0	0-6	0.0		Brown med sand and coal; loose, dry.			
2.0	1.0	0-6	0.0		SAA w/ some gravel, moist.	2.0	2.5	
4.0	1.0	0-6	0.0		SAA.	4.0	4.5	
6.0	1.4	12-18	0.0		Reddish brown fine sand w/some gravel; gravel up to 1"; moist, firm.	6.0	5.5	Collect sample 5-6 ft bgs.
8.0	1.0	6-12	0.0		Brown and grey fine-med sand, trace silt; slightly cohesive; saturated @ bottom of spoon.	8.0		
10.0	1.0	0-6	23		Gray fine-med sand w/ gravel and trace silt; slight petro odors @ 11-12 ft bgs.	10.0		PID=23ppm @ 11 ft bgs. Collect sample 10.5-11.5 ft bgs.
12.0	1.0	0-6	22		SAA, petro odors, sheen in water.	12.0		
14.0	1.2	0-6	0.0		Gray fine sand, trace silt; slightly cohesive; slight petro odors.	14.0		PID=22ppm @ 14 ft bgs.
16.0		0-6				16.0	15.5 16.0	

PROJECT <b>USEPA Brownfields</b>	LOCATION <b>ORC Properties, Oneonta, NY</b>	SHEET <b>1 OF 1</b>		
CLIENT		PROJECT No. <b>1185013</b>		
DRILLING CONTRACTOR <b>SJB</b>		MEAS. PT. ELEV.		
PURPOSE <b>Phase II ESA</b>		GROUND ELEV.		
WELL MATERIAL <b>PVC</b>		DATUM		
DRILLING METHOD(S) <b>HSA</b>	SAMPLE	CORE	DATE STARTED <b>5/3/06</b>	
DRILL RIG TYPE <b>Truck Mount</b>	TYPE		DATE FINISHED <b>5/3/06</b>	
GROUND WATER DEPTH <b>5.5'</b>	DIA.	"	DRILLER <b>B. Bosworth</b>	
MEASURING POINT <b>BGS</b>	WEIGHT	#	PIRNIE STAFF <b>J. Wyckoff</b>	
DATE OF MEASUREMENT <b>5/3/06</b>	FALL	"		

DEPTH FT.	SAMPLE TYPE RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
2	1.5	0-6	0.0		Brown fine-med sand and gravel; coal; dry; loose.	0.5		Collect sample .5-1.5 ft bgs.
		6-12						
4	1.0	6-12	0.0		Reddish-brown fine-med sand and gravel, trace silt; gravel up to 1.5"; dry, loose; some oxidation (rust color). SAA but no oxidation, gravel up to 1".	1.5		Collect sample 5-6 ft bgs.
		6-12				2.0		
		6-12						
		18-24						
6	1.0	0-6	0.0		Brown fine sand w/trace silt; moist, slightly cohesive; saturated @ 5.5 ft bgs.	4.0		
		6-12						
8	1.6	0-6	0.0		SAA.	6.0		
		6-12						
10	0.0	0-6	-		No recovery.	8.0		
		6-12						
12	1.2	0-6	0.0		Brown sandy silt w/some 0.5" gravel; loose.	10.0		
		6-12				11.5		
						12.0		

PROJECT <b>USEPA Brownfields</b>	LOCATION <b>ORC Properties, Oneonta, NY</b>	SHEET <b>1 OF 1</b>		
CLIENT		PROJECT No. <b>1185013</b>		
DRILLING CONTRACTOR <b>SJB</b>		MEAS. PT. ELEV.		
PURPOSE <b>Phase II ESA</b>		GROUND ELEV.		
WELL MATERIAL <b>PVC</b>		DATUM		
DRILLING METHOD(S) <b>HSA</b>	SAMPLE	CORE	CASING	
DRILL RIG TYPE <b>Truck Mount</b>	TYPE		<b>PVC</b>	
GROUND WATER DEPTH <b>3.0'</b>	DIA.	"	<b>.2"</b>	
MEASURING POINT <b>BGS</b>	WEIGHT	#	DRILLER <b>B. Bosworth</b>	
DATE OF MEASUREMENT <b>5/4/06</b>	FALL	"	PIRNIE STAFF <b>J. Wyckoff</b>	

DEPTH FT.	SAMPLE TYPE RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
2	1.0	0-6	0.0		Brown fine sand, trace silt; moist, slightly cohesive.	0.5		Collect sample 2-3 ft bgs.
		0-6						
		0-6						
		0-6						
4	1.2	6-12	0.0		SAA, saturated @ 3 ft bgs.	2.0		
		6-12						
		6-12						
6	1.3	0-6	0.0		SAA.	4.0		
		0-6						
8	1.5	0-6	0.0		SAA.	6.0		
		0-6						
10	1.2	0-6	0.0		SAA.	8.0		
		0-6						
		0-6						
						10.0		





# MALCOLM PIRNIE

## TEST BORING LOG

BORING No. SB11/MW09

PROJECT	USEPA Brownfields	LOCATION	ORC Properties, Oneonta, NY			SHEET	1 OF 2	
CLIENT						PROJECT No.	1185013	
DRILLING CONTRACTOR	SJB						MEAS. PT. ELEV.	
PURPOSE	Phase II ESA					GROUND ELEV.		
WELL MATERIAL	PVC					DATUM		
DRILLING METHOD(S)	HSA	SAMPLE	CORE	CASING		DATE STARTED	5/4/06	
DRILL RIG TYPE	Truck Mount	TYPE		PVC		DATE FINISHED	5/4/06	
GROUND WATER DEPTH	14.0'	DIA.	"	2"		DRILLER	B. Bosworth	
MEASURING POINT	BGS	WEIGHT	#			PIRNIE STAFF	J. Wyckoff	
DATE OF MEASUREMENT	5/4/06	FALL	"					

DEPTH FT.	SAMPLE TYPE, RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
2	1.0	6-12	0.0		Brown fine sand and silt w/some gravel and asphalt; dry, firm.	2.0		
		12-18						
		6-12						
4	1.0	6-12	0.0		SAA but no asphalt; moist, cohesive.	4.0		
		6-12						
		6-12						
6	0.0	0-6	--		No recovery, stone in end of spoon.	6.0		
		0-6						
		0-6						
8	1.0	0-6	0.0		SAA.	7.0		
		0-6						
		0-6						
10	0.5	0-6	0.0		SAA but more gravel.	8.5		
		6-12						
		6-12						
12	1.0	6-12	0.0		Brown fine-med sand and gravel; dry; loose.	9.5		
		12-18						
		6-12						
14	1.0	12-18	0.0		SAA, saturated @ 14 ft bgs.	10.0		
		6-12						
		6-12						
16	0	0-6	--		No recovery.	12.0		
		0-6						
		0-6						
18	1.0	6-12	0.0		Brown fine sand, trace silt, some gravel; firm.	14.0		
		6-12						
		6-12						
20	1.2	0-6	0.0		Brown fine sand, trace silt; firm, slightly cohesive.	16.0		
		0-6						
		0-6						
		0-6				18.0		
		0-6				19.5		
		0-6				20.0		

Collect sample 13-14 ft bgs.



PROJECT **USEPA Brownfields**LOCATION **ORC Properties, Oneonta, NY**SHEET **2 OF 2**

CLIENT

PROJECT No. **1185013**

DEPTH FT.	SAMPLE TYPE, RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
						20.0		



PROJECT USEPA Brownfields

LOCATION ORC Properties, Oneonta, NY

SHEET 2 OF 3

CLIENT

PROJECT No. 1185013

DEPTH FT.	SAMPLE TYPE, RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
22	0.9	0-6	0.0		Brown fine sand and gravel, trace silt; concrete; moist, slightly cohesive.	20.0		
		0-6				22.0		
		0-6						
24	0.2	0-6	0.0		Brown fine sand and gravel, trace silt; moist, slightly cohesive.	22.0		
		0-6						
		0-6						
26	0.5	0-6	0.0		SAA w/ concrete and painted wood fragments.	24.0		
		0-6						
		0-6						
28	0.5	0-6	0.0		Brown fine sand and gravel, trace silt; concrete; moist, slightly cohesive.	26.0		
		0-6						
		0-6						
30	0.2	0-6	0.0		Brown fine sand and gravel, trace silt; moist, slightly cohesive.	28.0		
		0-6						
		0-6						
32	0.9	2	0.0		SAA.	30.0		
		0-6						
		0-6						
34	1.2	0-6	0.0		Brown fine-med sand, trace silt; moist, loose.	31.5		
		0-6				32.0		
		0-6						
36	1.0	0-6	0.0		SAA.	34.0		
		0-6						
		0-6						
38	1.3	0-6	0.0		Brown fine sand and reddish-brown silt; stratified; moist, firm, slightly cohesive.	35.5		
		0-6				36.0		
		0-6						
40	1.2	0-6	0.0		Brown fine-med sand; moist, loose.	38.0		
		0-6				38.5		
		0-6						
42	1.1	0-6	0.0		SAA.	40.0		
		0-6						
		0-6						
44	1.2	6-12	0.0		SAA, saturated @ 44 ft bgs.	42.0		
		0-6						
		0-6						
44	1.5	0-6	0.0		SAA.	44.0		Collect sample 43-44 ft bgs.
		0-6						
		0-6						



PROJECT	USEPA Brownfields	LOCATION	ORC Properties, Oneonta, NY	SHEET	1 OF 1	
CLIENT					PROJECT No.	1185013
DRILLING CONTRACTOR	SJB					MEAS. PT. ELEV.
PURPOSE	Phase II ESA				GROUND ELEV.	
WELL MATERIAL	PVC				DATUM	
DRILLING METHOD(S)	HSA	SAMPLE	CORE	CASING	DATE STARTED 5/8/06	
DRILL RIG TYPE	Truck Mount	TYPE		PVC	DATE FINISHED 5/8/06	
GROUND WATER DEPTH	8.0'	DIA.	"	2"	DRILLER B. Bosworth	
MEASURING POINT	BGS	WEIGHT	#		PIRNIE STAFF J. Wyckoff	
DATE OF MEASUREMENT	5/8/06	FALL	"			

DEPTH FT.	SAMPLE TYPE RECOVERY NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
2	1.5	0-6	0.0		Dark brown fine-med sand and gravel, trace silt, gravel up to 1"; moist, slightly cohesive.	0.5		Collect sample 7-8 ft bgs. ▼
		0-6			Brown fine sand, trace silt; some organics; moist, slightly cohesive.	1.5		
		0-6						
		0-6						
		6-12						
		6-12						
		12-18						
		12-18						
		0-6						
		6-12						
		6-12						
		6-12						
4	0.5	0-6	0.0		Brown fine sand and gravel, trace silt, gravel up to 1.5"; moist.	3.5		
		6-12			SAA.	4.0		
		6-12						
		6-12						
		6-12			SAA, saturated @ 8 ft bgs.	6.0		
		6-12						
6	1.2	6-12	0.0					
		6-12						
		6-12						
		6-12						
8	1.2	0-6	0.0		SAA, sand coarsens downward.	8.0		
		6-12						
		6-12						
		6-12						
10	1.0	0-6	0.0		SAA.	10.0		
		0-6						
		0-6						
		0-6						
12		0-6	0.0			11.5		
						12.0		
						12.0		

# MALCOLM PIRNIÉ

## TEST BORING LOG

BORING No. SB14/MW12

PROJECT USEPA Brownfields

LOCATION ORC Properties, Oneonta, NY

SHEET 1 OF 1

CLIENT

PROJECT No. 1185013

DRILLING CONTRACTOR SJB

MEAS. PT. ELEV.

PURPOSE Phase II ESA

GROUND ELEV.

WELL MATERIAL PVC

DATUM

DRILLING METHOD(S) HSA

SAMPLE

CORE

CASING

DATE STARTED 5/8/06

DRILL RIG TYPE Truck Mount

TYPE

PVC

DATE FINISHED 5/8/06

GROUND WATER DEPTH 12.0'

DIA.

"

2"

DRILLER B. Bosworth

MEASURING POINT BGS

WEIGHT

#

PIRNIÉ STAFF J. Wyckoff

DATE OF MEASUREMENT 5/8/06

FALL

"

DEPTH FT.	SAMPLE TYPE, RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
2	1.8	6-12	0.0		Gray-brown fine-med gravely sand, trace silt, gravel up to 1"; dry, firm.	2.0		
		12-18						
		18-24						
		18-24						
4	1.5	19	0.0		SAA, very firm.	4.0		
		34						
		99						
6	1.0	76	0.0		SAA, moist @ 5 ft bgs.	6.0		5.5
		3						
		25						
8	1.2	33	30		Soft asphalt, petro odors, very moist.	6.0		6.5
		33						
		24						
10	0.1	16	0.0		Gray fine sand and silt; moist, cohesive.	8.0		
		14						
		6						
12	1.9	6	0.0		Brown fine sand and some gravel, trace silt, saturated @ 12 ft bgs; slightly cohesive.	10.0		
		0-6						
		0-6						
14	1.0	0-6	0.0		SAA, but brown-gray color.	12.0		7.5 Collect sample 7-8 ft bgs.
		0-6						
		0-6						
16	0.7	0-6	0.0		Brown fine-coarse sand and gravel, bony; gravel up to 1.5"; loose.	14.0		
		0-6						
		0-6						
18		0-6	0.0		SAA.	16.0		17.5
		0-6						
						18.0		18.0



PROJECT <b>USEPA Brownfields</b>	LOCATION <b>ORC Properties, Oneonta, NY</b>	SHEET <b>1 OF 1</b>	
CLIENT		PROJECT No. <b>1185013</b>	
DRILLING CONTRACTOR <b>SJB</b>		MEAS. PT. ELEV.	
PURPOSE <b>Phase II ESA</b>		GROUND ELEV.	
WELL MATERIAL <b>PVC</b>		DATUM	
DRILLING METHOD(S) <b>HSA</b>	SAMPLE	CORE	CASING
DRILL RIG TYPE <b>Truck Mount</b>	TYPE		<b>PVC</b>
GROUND WATER DEPTH <b>9.0'</b>	DIA.	"	<b>2"</b>
MEASURING POINT <b>BGS</b>	WEIGHT	#	
DATE OF MEASUREMENT <b>5/9/06</b>	FALL	"	
		DRILLER <b>B. Bosworth</b>	PIRNIE STAFF <b>J. Wyckoff</b>

DEPTH FT.	SAMPLE TYPE RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
2	1.5	0-6	0.0		Dark brown fine-med sand and gravel; coal, slag, cinders; moist, loose.	2.0		Collect sample 3-4 ft bgs.
		0-6						
		0-6						
4	1.3	6-12	0.0		SAA.	2.0		Collect sample 8-9 ft bgs.
		0-6						
		0-6						
6	1.0	0-6	0.0		Brown and tan fine sand and silt, trace clay; mottled; moist, cohesive.	4.0		
		0-6						
		0-6						
8	1.2	0-6	0.0		SAA.	6.0		
		0-6						
		0-6						
10	1.5	0-6	0.0		SAA.	8.0		
		0-6						
		0-6						
12	1.3	0-6	0.0		Brown fine sand, trace silt; saturated @ 9 ft bgs.	9.0		
		0-6						
		0-6						
14	1.2	6-12	0.0		Gray-brown fine sand and silt, trace clay; mottled; cohesive.	10.0		
		12-18						
		18-24						
					SAA w/increased sand content.	12.0		
					Gray fine-coarse sand and gravel, trace silt; gravel up to 1.5"; firm.	13.0		
						14.0		

PROJECT USEPA Brownfields

LOCATION ORC Properties, Oneonta, NY

SHEET 1 OF 1

CLIENT

PROJECT No. 1185013

DRILLING CONTRACTOR SJB

MEAS. PT. ELEV.

PURPOSE Phase II ESA

GROUND ELEV.

WELL MATERIAL PVC

DATUM

DRILLING METHOD(S) HSA

SAMPLE

CORE

CASING

DATE STARTED 5/9/06

DRILL RIG TYPE Truck Mount

TYPE

PVC

DATE FINISHED 5/9/06

GROUND WATER DEPTH 13.0'

DIA.

"

2"

DRILLER B. Bosworth

MEASURING POINT BGS

WEIGHT

#

PIRNIE STAFF J. Wyckoff

DATE OF MEASUREMENT 5/9/06

FALL

"

DEPTH FT.	SAMPLE TYPE RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
2	1.2	6-12	0.0		Brown fine sand and gravel; loose, dry.			Collect sample 1-2 ft bgs.
		6-12						
		6-12			1.0			
4	1.0	0-6	0.0		Brown fine sand; coal, cinders, slag; moist, loose.	1.0		
		0-6			2.0			
		0-6			4.0			
6	0.8	0-6	0.0		SAA, with gravel up to 1.5".			
		0-6			5.5			
		0-6			6.0	6.5		
8	0.7	0-6	30		Brown fine sand and silt w/ trace clay; mottled; moist, firm, cohesive.	6.0		
		0-6			7.5	7.5		
		0-6			8.0			
10	0.8	6-12	5.0		Brown-gray fine-coarse sand and gravel, trace silt; moist, slightly cohesive; petro odors.			
		6-12			10.0			
		6-12			10.0			
12	0.8	12-18	0.0		SAA, no petro odors @ bottom of sample interval.			PID=5ppm @ 10 ft bgs. Collect sample 9.5-10.5 ft bgs.
		12-18						
		12-18						
14	1.0	12-18	0.0		Brown-gray fine-coarse sand and gravel, trace silt, gravel up to 1.5", bony; saturated @ 13 ft bgs; cohesive where matrix is present; petro odors. Insufficient matrix for samples.	12.0		
		12-18			14.0			
		12-18			14.0			
16	1.5	0-6	0.0		SAA, slight petro odors, no sheen in water.			PID=0.0
		6-12						
		6-12						
18	1.5	12-18	0.0		SAA, no odors, no sheen	16.0		
		6-12						
		6-12						
						17.5		
						18.0		
						18.0		

PROJECT USEPA Brownfields

LOCATION ORC Properties, Oneonta, NY

SHEET 1 OF 1

CLIENT

PROJECT No. 1185013

DRILLING CONTRACTOR SJB

MEAS. PT. ELEV.

PURPOSE Phase II ESA

GROUND ELEV.

WELL MATERIAL PVC

DATUM

DRILLING METHOD(S) HSA

SAMPLE

CORE

CASING

DRILL RIG TYPE Truck Mount

TYPE

PVC

GROUND WATER DEPTH 7.5'

DIA.

"

2"

DATE STARTED 5/9/06

DATE FINISHED 5/9/06

MEASURING POINT BGS

WEIGHT

#

DRILLER B. Bosworth

DATE OF MEASUREMENT 5/9/06

FALL

"

PIRNIE STAFF J. Wyckoff

DEPTH FT.	SAMPLE TYPE, RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
2	1.3	0-6	10.7		Brown fine-med sand and gravel; dry, loose.			PID=10.7 ppm @ 1.5 ft bgs. Collect sample 1-2 ft bgs.
		30			Asphalt; loose; petro odors.	1.0		
		20						
		10						
4	1.2	6-12	0.0		Brown-gray fine sand and silt, trace clay, mottled; moist, firm, cohesive.	2.0		
		0-6						
		0-6						
6	1.2	6-12	0.0		SAA.	4.0		
		0-6						
8	1.3	6-12	0.0		SAA.	6.0		Collect sample 7-8 ft bgs.
		6-12						
		6-12						
		6-12						
						8.0		

PROJECT USEPA Brownfields

LOCATION ORC Properties, Oneonta, NY

SHEET 1 OF 1

CLIENT

PROJECT No. 1185013

DRILLING CONTRACTOR SJB

MEAS. PT. ELEV.

PURPOSE Phase II ESA

GROUND ELEV.

WELL MATERIAL PVC

DATUM

DRILLING METHOD(S) HSA

SAMPLE

CORE

CASING

DATE STARTED 5/9/06

DRILL RIG TYPE Truck Mount

TYPE

PVC

DATE FINISHED 5/9/06

GROUND WATER DEPTH 7.5'

DIA.

"

2"

MEASURING POINT BGS

WEIGHT

#

DRILLER B. Bosworth

DATE OF MEASUREMENT 5/9/06

FALL

"

PIRNIE STAFF J. Wyckoff

DEPTH FT.	SAMPLE TYPE, RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
2	1.2	0-6	0.0		Brown-gray fine-med sand and gravel, trace silt; dry, firm 0-1 ft bgs, loose 1-2 ft bgs.			
		6-12						
		18-24						
		30						
4	1.3	NR	6.8		Coal, sand, gravel; petro odors.	2.0		
		NR						
		NR						
		NR						
6	0.5	NR	0.0		Brown-gray fine-coarse sand and gravel, trace silt; moist.	3.0		
		NR						
		NR						
		NR						
8	1.0	NR	0.0		SAA, saturated @ 7.5 ft bgs.	6.0		
		NR						
		NR						
		NR						
						8.0		

PID=6.8ppm @ 2.5 ft bgs. Collect sample 2.5-3.5 ft bgs.

Collect sample 7-8 ft bgs.

PROJECT USEPA Brownfields

LOCATION ORC Properties, Oneonta, NY

SHEET 1 OF 1

CLIENT

PROJECT No. 1185013

DRILLING CONTRACTOR SJB

MEAS. PT. ELEV.

PURPOSE Phase II ESA

GROUND ELEV.

WELL MATERIAL PVC

DATUM

DRILLING METHOD(S) HSA

SAMPLE

CORE

CASING

DRILL RIG TYPE Truck Mount

TYPE

PVC

DATE STARTED 5/9/06

GROUND WATER DEPTH 7.0'

DIA.

"

2"

DATE FINISHED 5/9/06

MEASURING POINT BGS

WEIGHT

#






DRILLER B. Bosworth

DATE OF MEASUREMENT 5/9/06

FALL

"

PIRNIE STAFF J. Wyckoff

DEPTH FT.	SAMPLE TYPE, RECOVERY, NUMBER	BLOWS ON SAMPLE SPOON PER 6"	PID	GRAPHIC LOG	GEOLOGIC DESCRIPTION KEY - Color, Major, Minor Moisture, Etc.	ELEV. DEPTH	WELL Constr.	REMARKS
2	1.0	0-6	0.0		Brown fine-med sand and gravel, trace silt, gravel up to 1.5'; 0-0.5 ft bgs dry, loose; 0.5-2 ft bgs moist, firm.			
		6-12						
		6-12						
		6-12						
4	1.0	0-6	0.0		SAA.	2.0		
		0-6						
		0-6						
6	1.0	0-6	0.0		Brown-grey fine sand and silt; slightly cohesive.	5.0		
		0-6						
8	1.5	0-6	0.0		SAA.	6.0		Collect sample 6-7 ft bgs.
		6-12						
		6-12						
					Brown-gray fine-med sand and gravel; bony; saturated.	7.0		
						8.0		

## **APPENDIX B**

Well Development and Groundwater Sampling Purge Logs



## WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:**           MW-1                                **DATE:**           5/22/06          

**PROJECT NAME:**           Oneonta BF            
**PROJECT NUMBER:**           1185013            
**SAMPLERS:**           J. Wyckoff          

A: Total Casing and Screen Length:           13.15            
 B: Casing Internal Diameter:           2"            
 C: Water Level Below Top of Casing:           6.51            
 D: Volume of Water in Casing:           1.1          

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

$v = 0.0408 (B)^2 \times (A-C) = D$

$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \underline{\hspace{2cm}} \text{ gal.}$

PARAMETER	ACCUMULATED VOLUME PURGED													
Time	0725	0730	0735	0740	0745	0750	0755	0800	0805					
Gallons	0								6					
Well Volume														
Conductivity (mohm/cm)	0.743	0.746	0.748	0.75	0.747	0.751	0.75	0.75	0.748					
Dissolved Oxygen (mg/l)	11.82	2.08	0.4	0.38	0.36	0.22	0.19	0.18	0.19					
REDOX (mV)	-44	-64	-73	-76	-78	-79	-80	-81	-82					
pH	5.79	6.14	6.3	6.36	6.38	6.4	6.41	6.41	6.42					
Temperature (°C)	9.54	9.93	9.87	9.91	9.95	9.95	9.97	9.95	10.1					
Turbidity (ntu)	149	44.5	64.5	37.5	17.9	1.5	0	0	0					
Depth to Water	6.72	6.72	6.72	6.73	6.73	6.74	6.74	6.75	6.75					
Salinity														
TDS														

**Notes:**           0725 - initiate purge            
          0805 - finish purge, collect samples            
          - purged ~6.0gallons            
          - no sheens



# WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:** MW-02 page 1 of 2

**DATE:** 5/22/06

**PROJECT NAME:** Oneonta BF

**PROJECT NUMBER:** 1185013

**SAMPLERS:** J. Wyckoff

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

A: Total Casing and Screen Length: 18.20

B: Casing Internal Diameter: 2"

C: Water Level Below Top of Casing: 10.62

D: Volume of Water in Casing: 1.3

$v = 0.0408 (B)^2 \times (A-C) = D$

$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \quad \text{gal.}$

PARAMETER	ACCUMULATED VOLUME PURGED													
	0835	0840	0845	0850	0855	0900	0905	0910	0915	0920	0925	0930	0935	0940
Time														
Gallons	0							5					7	
Well Volume														
Conductivity (mohm/cm)	0.539	0.533	0.532	0.531	0.531	0.531	0.532	0.532	0.533	0.534	0.535	0.536	0.536	0.538
Dissolved Oxygen (mg/l)	12.2	0	6.4	0	0	0	0	0	0	0	0	0	0	0
REDOX (mV)	-53	-59	-62	-64	-66	-66	-68	-69	-70	-70	-70	-70	-71	-71
pH	6.46	6.27	6.3	6.27	6.28	6.27	6.8	6.27	6.28	6.27	6.26	6.27	6.27	6.26
Temperature (°C)	9.18	9.3	9.28	9.23	9.21	9.17	9.14	9.14	9.2	9.21	9.29	9.32	9.32	9.29
Turbidity (ntu)	>999	>999	620	319	191	119	65.7	43.7	22.7	17.1	7.9	2.6	0	0
Depth to Water	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64	10.64
Empty Flow Cell														
Salinity														
TDS														

**Notes:** 0835 - initiate purge

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## WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:** MW-02 page 2 of 2

**DATE:** 5/22/06

**PROJECT NAME:** Oneonta BF

**PROJECT NUMBER:** 1185013

**SAMPLERS:** J. Wyckoff

A: Total Casing and Screen Length: 18.20

B: Casing Internal Diameter: 2"

C: Water Level Below Top of Casing: 10.62

D: Volume of Water in Casing: 1.3

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

$$v = 0.0408 (B)^2 \times (A-C) = D$$

$$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \quad \text{gal.}$$

PARAMETER	ACCUMULATED VOLUME PURGED												
Time	0945												
Gallons	8												
Well Volume													
Conductivity (mohm/cm)	0.538												
Dissolved Oxygen (mg/l)	0												
REDOX (mV)	-72												
pH	6.26												
Temperature (°C)	9.23												
Turbidity (ntu)	0												
Depth to Water	10.64												
Empty Flow Cell													
Salinity													
TDS													

Notes: 0835 - initiate purge

0840 - Empty flow cell due to sediment in bottom

0945 - Finish purge, collect samples

-purged ~8.0 gallons. No sheen.



# WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:** MW-03 page 1 of 2

**DATE:** 5/22/06

**PROJECT NAME:** Oneonta BF

**PROJECT NUMBER:** 1185013

**SAMPLERS:** J. Wyckoff

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

A: Total Casing and Screen Length: 14.84

B: Casing Internal Diameter: 2"

C: Water Level Below Top of Casing: 7.34

D: Volume of Water in Casing: 1.3

$v = 0.0408 (B)^2 \times (A-C) = D$

$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \quad \text{gal.}$

PARAMETER	ACCUMULATED VOLUME PURGED													
	1045	1050	1055	1100	1105	1110	1115	1120	1125	1130	1135	1140	1145	1150
Time														
Gallons	0												7	
Well Volume														
Conductivity (mohm/cm)	0.454	0.453	0.45	0.449	0.453	0.456	0.457	0.458	0.458	0.459	0.459	0.46	0.461	0.462
Dissolved Oxygen (mg/l)	19.05	6.17	4.94	8.7	6.36	6.3	5.36	4.22	3.83	3.69	3.61	3.67	3.54	3.59
REDOX (mV)	55	112	139	151	160	176	176	177	178	180	182	184	185	187
pH	6.71	6.28	6.17	6.16	6.14	6.13	6.13	6.1	6.12	6.13	6.12	6.12	6.12	6.12
Temperature (°C)	9.5	9.36	9.3	9.29	9.25	9.13	9.14	9.09	9.11	9.09	9.09	9.05	9.09	9.08
Turbidity (ntu)	17	30.7	39.6	28.4	21.9	30.4	27.2	31.2	24.1	18.7	13	8.2	1.3	1.4
Depth to Water	7.39	7.28	7.39	7.39	7.39	7.40	7.40	7.40	7.41	7.41	7.41	7.41	7.41	7.41
Salinity														
TDS														

**Notes:** 1045 - initiate purge

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# WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:** MW-03 page 2 o 2

**DATE:** 5/22/06

**PROJECT NAME:** Oneonta BF

**PROJECT NUMBER:** 1185013

**SAMPLERS:** J. Wyckoff

A: Total Casing and Screen Length: 14.84

B: Casing Internal Diameter: 2"

C: Water Level Below Top of Casing: 7.34

D: Volume of Water in Casing: 1.3

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

$$v = 0.0408 (B)^2 \times (A-C) = D$$

$$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \quad \text{gal.}$$

PARAMETER	ACCUMULATED VOLUME PURGED												
Time	1155	1200	1205										
Gallons			8.5										
Well Volume													
Conductivity (mohm/cm)	0.463	0.465	0.467										
Dissolved Oxygen (mg/l)	3.71	3.75	3.71										
REDOX (mV)	187	189	190										
pH	6.13	6.13	6.12										
Temperature (°C)	9.08	9.11	9.06										
Turbidity (ntu)	0	0	0										
Depth to Water	7.41	7.41	7.41										
Salinity													
TDS													

Notes: 1045 - initiate purge

1205 - finish purge, collect samples

-purged ~8.5 gallons, no sheen





## WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:**           MW-05                                **DATE:**           5/22/06          

**PROJECT NAME:**           Oneonta BF            
**PROJECT NUMBER:**           1185013            
**SAMPLERS:**           J. Wyckoff          

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

A: Total Casing and Screen Length:           19.70            
 B: Casing Internal Diameter:           2"            
 C: Water Level Below Top of Casing:           2.92            
 D: Volume of Water in Casing:           2.9          

$v = 0.0408 (B)^2 \times (A-C) = D$

$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \underline{\hspace{2cm}} \text{ gal.}$

PARAMETER	ACCUMULATED VOLUME PURGED													
Time	1420	1425	1430	1435	1440	1445	1450	1455	1500	1505	1510			
Gallons	0										4.5			
Well Volume														
Conductivity (mohm/cm)	0.41	0.406	0.409	0.409	0.409	0.409	0.409	0.409	0.41	0.409	0.409			
Dissolved Oxygen (mg/l)	14.43	4.09	1.55	1.22	1	0.95	0.92	0.89	0.85	0.82	0.88			
REDOX (mV)	7	3	3	9	13	16	18	21	23	26	30			
pH	6.7	6.88	7.05	7.25	7.31	7.39	7.42	7.47	7.51	7.54	7.57			
Temperature (°C)	9.2	9.14	8.83	8.72	8.68	8.69	8.7	8.71	8.73	8.7	8.7			
Turbidity (ntu)	829	449	635	69	57.4	42.8	3.4	0	0	0	0			
Depth to Water	9.92	9.92	9.93	9.93	9.93	9.93	9.93	9.93	9.93	9.93	9.93			
Clean Flow Cell			X											
Salinity														
TDS														

**Notes:**           1420 - initiate purge            
          1430 - clean sediment from flow cell            
          1510 - finish purge, collect samples, collect Duplicate sample ORC-MW-X            
          -purged ~4.5 gallons, no sheen



## WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:**           MW-06                                **DATE:**           5/23/06          

**PROJECT NAME:**           Oneonta BF            
**PROJECT NUMBER:**           1185013            
**SAMPLERS:**           J. Wyckoff          

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

A: Total Casing and Screen Length:           17.53            
 B: Casing Internal Diameter:           2"            
 C: Water Level Below Top of Casing:           12.14            
 D: Volume of Water in Casing:           0.9          

$v = 0.0408 (B)^2 \times (A-C) = D$

$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \underline{\hspace{2cm}} \text{ gal.}$

PARAMETER	ACCUMULATED VOLUME PURGED												
	1000	1005	1015	1020	1025	1030	1035	1040	1045	1050	1055		
Time													
Gallons	0										4.5		
Well Volume													
Conductivity (mohm/cm)	0.218	0.216	0.229	0.225	0.223	0.222	0.22	0.22	0.221	0.221	0.219		
Dissolved Oxygen (mg/l)	19.9	2.91	1.08	0.43	0.27	0.09	0.05	0.06	0.09	0.07	0.02		
REDOX (mV)	-15	-27	-38	-34	-38	-37	-39	-40	-42	-42	-41		
pH	5.81	6	6.04	6.03	6.06	6.06	6.06	6.07	6.08	6.09	6.07		
Temperature (°C)	10.09	9.5	9.37	9.41	9.47	9.42	9.48	9.43	9.44	9.46	9.53		
Turbidity (ntu)	22.7	6	14.4	37.8	31.2	23.6	31.8	27.8	24.7	24.4	22.9		
Depth to Water	12.41	12.65	12.93	13.03	13.09	13.15	13.20	13.26	13.26	13.26	13.26		
Salinity													
TDS													

**Notes:**           0955 - initiate purge            
          1055 - finish purge, collect samples            
          -purged ~4.5 gallons, no sheen



## WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:**           MW-07                                **DATE:**           5/22/06          

**PROJECT NAME:**           Oneonta BF            
**PROJECT NUMBER:**           1185013            
**SAMPLERS:**           J. Wyckoff          

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

A: Total Casing and Screen Length:           11.70            
 B: Casing Internal Diameter:           2"            
 C: Water Level Below Top of Casing:           3.73            
 D: Volume of Water in Casing:           1.4          

$v = 0.0408 (B)^2 \times (A-C) = D$

$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \quad \text{gal.}$

PARAMETER	ACCUMULATED VOLUME PURGED													
Time	1535	1540	1545	1550	1555	1600	1605	1610	1615					
Gallons	0								4					
Well Volume														
Conductivity (mohm/cm)	0.351	0.352	0.352	0.35	0.35	0.35	0.35	0.35	0.35					
Dissolved Oxygen (mg/l)	9.7	0.97	0	0	0.45	1.08	1.19	1.16	1.19					
REDOX (mV)	149	197	211	231	237	250	255	258	264					
pH	5.43	4.73	4.42	4.31	4.28	4.22	4.2	4.2	4.17					
Temperature (°C)	9.57	9.52	9.49	9.66	9.56	9.55	9.52	9.54	9.41					
Turbidity (ntu)	96.5	95.9	96.3	9.9	0	0	0	0	0					
Depth to Water	3.94	3.99	4.08	4.21	4.32	4.36	4.37	4.40	4.41					
Salinity														
TDS														

**Notes:**           1535 - initiate purge            
          1615 - finish purge, collect samples            
          -purged ~4 gallons, no sheen



## WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:** MW-08 page 1 of 3

**DATE:** 5/23/06

**PROJECT NAME:** Oneonta BF

**PROJECT NUMBER:** 1185013

**SAMPLERS:** J. Wyckoff

A: Total Casing and Screen Length: 9.50

B: Casing Internal Diameter: 2"

C: Water Level Below Top of Casing: 6.20

D: Volume of Water in Casing: 0.6

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

$$v = 0.0408 (B)^2 \times (A-C) = D$$

$$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \quad \text{gal.}$$

PARAMETER	ACCUMULATED VOLUME PURGED													
	1130	1135	1140	1145	1150	1155	1200	1205	1210	1215	1220	1225	1230	1235
Time														
Gallons	0											5.5	5.5	
Well Volume														
Conductivity (mohm/cm)	0.074	0.07	0.07	0.07	0.069	0.068	0.068	0.068	0.069	0.07	0.071	0.071	0.072	0.073
Dissolved Oxygen (mg/l)	19.9	12.7	11.64	11.24	11.02	11	10.98	11.04	11.09	11.07	11.03	11.01	11	11.25
REDOX (mV)	12	56	87	104	120	134	143	147	148	149	150	150	150	147
pH	6.6	6.54	6.49	6.44	6.44	6.42	6.4	6.41	6.42	6.45	6.48	6.49	6.51	6.51
Temperature (°C)	11.21	11.3	11.66	11.71	11.64	11.67	11.72	11.71	11.64	11.48	11.34	11.32	11.24	11.22
Turbidity (ntu)	445	302	239	465	458	963	>999	>999	>999	>999	927	798	656	441
Depth to Water	6.40	6.57	6.61	6.71	6.86	7.03	7.26	7.35	7.48	7.62	7.65	7.66	7.68	7.71
Clean Flow Cell													X	
Salinity														
TDS														

Notes: 1130 - initiate purge

1230 - dump flow cell, clean sediment

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# WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:** MW-08 page 2 of 3

**DATE:** 5/23/06

**PROJECT NAME:** Oneonta BF

**PROJECT NUMBER:** 1185013

**SAMPLERS:** J. Wyckoff

A: Total Casing and Screen Length: 9.50

B: Casing Internal Diameter: 2"

C: Water Level Below Top of Casing: 6.20

D: Volume of Water in Casing: 0.6

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

$$v = 0.0408 (B)^2 \times (A-C) = D$$

$$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \quad \text{gal.}$$

PARAMETER	ACCUMULATED VOLUME PURGED													
	1240	1245	1250	1255	1300	1305	1310	1315	1320	1325	1330	1335	1340	1345
Time														
Gallons										12	12			
Well Volume														
Conductivity (mohm/cm)	0.073	0.074	0.074	0.074	0.075	0.076	0.077	0.077	0.078	0.078	0.078	0.079	0.079	0.079
Dissolved Oxygen (mg/l)	11.1	11.1	11.02	11.01	10.96	10.96	11.05	11.09	11.01	11.04	11.07	11.04	10.98	10.94
REDOX (mV)	147	147	146	145	143	141	143	141	141	142	142	141	141	142
pH	6.52	6.54	6.55	6.56	6.57	6.58	6.6	6.6	6.62	6.62	6.63	6.65	6.65	6.66
Temperature (°C)	11.13	11.1	11.08	11.1	11.06	11.08	11.07	11.04	11.02	11	10.99	11.02	10.96	10.95
Turbidity (ntu)	396	340	291	242	193	153	124	108	85.7	73.2	61.1	55.4	43.7	40.3
Depth to Water	7.74	7.75	7.76	7.78	7.78	7.79	7.79	7.79	7.80	7.80	7.80	7.80	7.80	7.80
Clean Flow Cell														
Salinity														
TDS														

Notes: 1130 - initiate purge

1230 - dump flow cell, clean sediment

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## WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:** MW-08 page 3 of 3

**DATE:** 5/23/06

**PROJECT NAME:** Oneonta BF

**PROJECT NUMBER:** 1185013

**SAMPLERS:** J. Wyckoff

A: Total Casing and Screen Length: 9.50

B: Casing Internal Diameter: 2"

C: Water Level Below Top of Casing: 6.20

D: Volume of Water in Casing: 0.6

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

$$v = 0.0408 (B)^2 \times (A-C) = D$$

$$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \quad \text{gal.}$$

PARAMETER	ACCUMULATED VOLUME PURGED																		
Time	1350	1355	1400	1445															
Gallons			15	15.5															
Well Volume																			
Conductivity (mohm/cm)	0.079	0.08	0.08	0.079															
Dissolved Oxygen (mg/l)	10.93	10.9	10.89	10.89															
REDOX (mV)	142	144	144	144															
pH	6.66	6.66	6.67	6.68															
Temperature (°C)	10.94	10.94	10.96	10.87															
Turbidity (ntu)	30.7	26	24.4	24															
Depth to Water	7.81	7.81	7.81	7.81															
Clean Flow Cell																			
Salinity																			
TDS																			

Notes: 1130 - initiate purge

1230 - dump flow cell, clean sediment

1405 - finish purge, collect samples

-purged ~15.5 gallons, no sheen



## WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:**           MW-09                                **DATE:**           5/24/06          

**PROJECT NAME:**           Oneonta BF            
**PROJECT NUMBER:**           1185013            
**SAMPLERS:**           J. Wyckoff          

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

A: Total Casing and Screen Length:           17.98            
 B: Casing Internal Diameter:           2"            
 C: Water Level Below Top of Casing:           11.82            
 D: Volume of Water in Casing:           1.0          

$v = 0.0408 (B)^2 \times (A-C) = D$

$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \underline{\hspace{2cm}} \text{ gal.}$

PARAMETER	ACCUMULATED VOLUME PURGED													
Time	1255	1300	1305	1310	1315	1320	1325	1330	1335	1340	1345			
Gallons	0										4.5			
Well Volume														
Conductivity (mohm/cm)	0.664	0.638	0.616	0.607	0.607	0.604	0.605	0.613	0.604	0.606	0.603			
Dissolved Oxygen (mg/l)	19.99	14.54	14.3	14.05	13.74	13.48	13.35	13.09	12.96	12.81	12.73			
REDOX (mV)	139	178	204	217	223	229	233	235	237	238	239			
pH	6.4	5.86	5.62	5.56	5.54	5.54	5.54	5.54	5.56	5.57	5.58			
Temperature (°C)	11.77	11.09	10.92	10.77	10.7	10.75	10.6	10.66	10.65	10.7	10.76			
Turbidity (ntu)	124	72.4	61.2	45.1	41.4	26.8	27	32.7	25.5	26.6	27.2			
Depth to Water	11.83	11.83	11.83	11.83	11.83	11.83	11.83	11.83	11.84	11.84	11.84			
Salinity														
TDS														

**Notes:**           1255 - initiate purge            
          1345 - finish purge, collect samples            
          -purged ~4.5 gallons, no sheen





# WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:** MW-11 page 1 of 2

**DATE:** 5/23/06

**PROJECT NAME:** Oneonta BF

**PROJECT NUMBER:** 1185013

**SAMPLERS:** J. Wyckoff

A: Total Casing and Screen Length: 11.40

B: Casing Internal Diameter: 2"

C: Water Level Below Top of Casing: 3.29

D: Volume of Water in Casing: 1.4

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

$v = 0.0408 (B)^2 \times (A-C) = D$

$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \quad \text{gal.}$

PARAMETER	ACCUMULATED VOLUME PURGED													
	1420	1430	1435	1440	1445	1450	1455	1500	1505	1510	1515	1520	1525	1530
Time														
Gallons	0									6		7		
Well Volume														
Conductivity (mohm/cm)	0.355	0.354	0.356	0.357	0.357	0.357	0.357	0.356	0.356	0.356	0.355	0.356	0.354	0.354
Dissolved Oxygen (mg/l)	8.27	0	0	0	0	0	0	0	0	0	0	0	0	0
REDOX (mV)	159	149	142	132	117	114	106	100	92	90	87	85	84	82
pH	6.57	6.69	6.72	6.79	6.85	6.87	6.91	6.93	6.95	6.96	6.96	6.98	6.98	6.99
Temperature (°C)	8.65	8.42	8.46	8.41	8.38	8.39	8.4	8.42	8.41	8.41	8.38	8.37	8.38	8.38
Turbidity (ntu)	574	330	367	239	170	146	128	101	77.1	62	49.9	37.3	34.6	23.9
Depth to Water	3.30	3.30	3.30	3.30	3.30	3.30	3.30	3.30	3.30	3.30	3.30	3.30	3.30	3.30
Salinity														
TDS														

Notes: 1420 - initiate purge

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# WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:** MW-11 page 2 of 2

**DATE:** 5/23/06

**PROJECT NAME:** Oneonta BF

**PROJECT NUMBER:** 1185013

**SAMPLERS:** J. Wyckoff

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

A: Total Casing and Screen Length: 11.40

B: Casing Internal Diameter: 2"

C: Water Level Below Top of Casing: 3.29

D: Volume of Water in Casing: 1.4

$v = 0.0408 (B)^2 \times (A-C) = D$

$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \quad \text{gal.}$

PARAMETER	ACCUMULATED VOLUME PURGED														
Time	1535	1540	1545	1550	1555	1600									
Gallons						10									
Well Volume															
Conductivity (mohm/cm)	0.354	0.353	0.053	0.053	0.353	0.352									
Dissolved Oxygen (mg/l)	0	0	0	0	0	0									
REDOX (mV)	81	81	81	80	80	79									
pH	6.99	7	7	7	7.01	7.01									
Temperature (°C)	8.39	8.39	8.37	8.35	8.37	8.39									
Turbidity (ntu)	17.7	10.4	3.6	0	0	0									
Depth to Water	3.30	3.31	3.31	3.31	3.31	3.31									
Salinity															
TDS															

Notes: 1420 - initiate purge

1600 - finish purge, collect samples, collect ms/msd

-purged ~10 gallons, no sheen



# WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:** MW-12 page 1 of 2

**DATE:** 5/24/06

**PROJECT NAME:** Oneonta BF

**PROJECT NUMBER:** 1185013

**SAMPLERS:** J. Wyckoff

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

A: Total Casing and Screen Length: 19.63

B: Casing Internal Diameter: 2"

C: Water Level Below Top of Casing: 8.12

D: Volume of Water in Casing: 2.0

$v = 0.0408 (B)^2 \times (A-C) = D$

$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \quad \text{gal.}$

PARAMETER	ACCUMULATED VOLUME PURGED													
	0620	0625	0630	0635	0640	0645	0650	0655	0700	0705	0710	0715	0720	0725
Time														
Gallons	0											6.5		
Well Volume														
Conductivity (mohm/cm)	0.886	0.932	0.926	0.885	0.854	0.833	0.792	0.706	0.677	0.661	0.632	0.61	0.611	0.577
Dissolved Oxygen (mg/l)	7.69	0	0	0	0	0	0	0	0	0	0	0	0	0.13
REDOX (mV)	-91	-116	-123	-128	-131	-133	-134	-135	-135	-135	-135	-134	-134	-134
pH	6.27	6.6	6.67	6.74	6.81	6.83	6.87	6.9	6.9	6.91	6.94	6.93	6.94	6.95
Temperature (°C)	8.6	8.7	8.68	8.67	8.68	8.69	8.72	8.75	8.76	8.78	8.8	8.77	8.81	8.83
Turbidity (ntu)	568	485	493	506	437	330	257	159	123	108	69.4	53	41.1	34.9
Depth to Water	8.14	8.14	8.14	8.14	8.14	8.14	8.14	8.14	8.14	8.14	8.14	8.14	8.14	8.14
Salinity														
TDS														

Notes: 0620 - initiate purge

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## WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:** MW-12 page 2 of 2

**DATE:** 5/24/06

**PROJECT NAME:** Oneonta BF

**PROJECT NUMBER:** 1185013

**SAMPLERS:** J. Wyckoff

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

A: Total Casing and Screen Length: 19.63

B: Casing Internal Diameter: 2"

C: Water Level Below Top of Casing: 8.12

D: Volume of Water in Casing: 2.0

$v = 0.0408 (B)^2 \times (A-C) = D$

$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \quad \text{gal.}$

PARAMETER	ACCUMULATED VOLUME PURGED												
	0730	0735	0740	0745	0750	0755	0800	0805					
Time													
Gallons								11					
Well Volume													
Conductivity (mohm/cm)	0.569	0.559	0.541	0.526	0.516	0.501	0.498	0.49					
Dissolved Oxygen (mg/l)	0.11	0.18	0.24	0.38	0.49	0.65	0.68	0.63					
REDOX (mV)	-133	-133	-133	-132	-131	-131	-130	-130					
pH	6.94	6.95	6.95	6.95	6.96	6.95	6.96	6.95					
Temperature (°C)	8.84	8.87	8.92	8.95	8.96	8.98	9.02	9.04					
Turbidity (ntu)	22.3	20	12.5	10.1	2.1	0	0	0					
Depth to Water	8.14	8.14	8.14	8.14	8.14	8.14	8.14	8.14					
Salinity													
TDS													

Notes: 0620 - initiate purge

0805 - finish purge, collect samples

-purged ~11 gallons, no sheen





## WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:** MW-13 page 1 of 2

**DATE:** 5/24/06

**PROJECT NAME:** Oneonta BF

**PROJECT NUMBER:** 1185013

**SAMPLERS:** J. Wyckoff

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

A: Total Casing and Screen Length: 16.64

B: Casing Internal Diameter: 2"

C: Water Level Below Top of Casing: 9.44

D: Volume of Water in Casing: 1.2

$v = 0.0408 (B)^2 \times (A-C) = D$

$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \quad \text{gal.}$

PARAMETER	ACCUMULATED VOLUME PURGED													
	0845	0850	0855	0900	0905	0910	0915	0920	0925	0930	0935	0940	0945	0950
Time														
Gallons	0											3.5		
Well Volume														
Conductivity (mohm/cm)	0.246	0.237	0.237	0.238	0.238	0.238	0.238	0.239	0.239	0.241	0.241	0.241	0.241	0.242
Dissolved Oxygen (mg/l)	19.05	3.85	2.68	2.52	2.45	2.53	2.58	2.65	2.64	2.63	2	1.85	2.28	2.33
REDOX (mV)	98	150	170	181	190	192	194	192	190	188	187	183	180	177
pH	6.65	5.95	5.82	5.78	5.76	5.75	5.76	5.76	5.76	5.77	5.77	5.77	5.78	5.78
Temperature (°C)	9.08	8.81	8.92	8.89	8.78	8.79	8.75	8.76	8.83	8.75	8.79	8.75	8.82	8.85
Turbidity (ntu)	130	294	379	270	160	123	56.7	36.7	32.2	25.2	24.7	23	22.2	18.9
Depth to Water	9.46	9.46	9.46	9.46	9.46	9.46	9.46	9.46	9.46	9.46	9.46	9.46	9.46	9.46
Salinity														
TDS														

**Notes:** 0845 - initiate purge

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



## WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:** MW-13 page 2 of 2

**DATE:** 5/24/06

**PROJECT NAME:** Oneonta BF

**PROJECT NUMBER:** 1185013

**SAMPLERS:** J. Wyckoff

A: Total Casing and Screen Length: 16.64

B: Casing Internal Diameter: 2"

C: Water Level Below Top of Casing: 9.44

D: Volume of Water in Casing: 1.2

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

$$v = 0.0408 (B)^2 \times (A-C) = D$$

$$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \quad \text{gal.}$$

PARAMETER	ACCUMULATED VOLUME PURGED												
Time	0955	1000	1005										
Gallons			5										
Well Volume													
Conductivity (mohm/cm)	0.243	0.243	0.244										
Dissolved Oxygen (mg/l)	2.29	2.27	2.2										
REDOX (mV)	175	172	169										
pH	5.79	5.79	5.79										
Temperature (°C)	8.87	8.83	8.86										
Turbidity (ntu)	19	18.7	18.1										
Depth to Water	9.46	9.46	9.46										
Salinity													
TDS													

Notes: 0845 - initiate purge

1005 - finish purge, collect samples

-purged ~5 gallons, no sheen



## WELL DEVELOPMENT/ PURGING LOG

**WELL NUMBER:**           MW-14                                **DATE:**           5/24/06          

**PROJECT NAME:**           Oneonta BF            
**PROJECT NUMBER:**           1185013            
**SAMPLERS:**           J. Wyckoff          

Well I.D.	Vol. Gal./ft.
1"	0.04
2"	0.17
3"	0.38
4"	0.66
5"	1.04
6"	1.50
8"	2.60

A: Total Casing and Screen Length:           19.91            
 B: Casing Internal Diameter:           2"            
 C: Water Level Below Top of Casing:           9.47                DTP=9.465  
 D: Volume of Water in Casing:           1.8          

$v = 0.0408 (B)^2 \times (A-C) = D$

$v = 0.0408 ( \quad )^2 \times ( \quad - \quad ) = \underline{\hspace{2cm}} \text{ gal.}$

PARAMETER	ACCUMULATED VOLUME PURGED											
	1030	1035	1040	1045	1050	1055	1100	1105	1110	1115	1120	1125
Time												
Gallons	0											5.5
Well Volume												
Conductivity (mohm/cm)	0.437	0.423	0.427	0.428	0.432	0.433	0.431	0.43	0.429	0.43	0.431	0.43
Dissolved Oxygen (mg/l)	19.8	2.22	1.76	1.53	1.31	1.39	1.15	1.18	1.08	1.05	1.01	0.98
REDOX (mV)	-84	-116	-122	-125	-129	-132	-132	-133	-134	-135	-135	-136
pH	6.3	6.55	6.57	6.59	6.63	6.65	6.66	6.67	6.69	6.69	6.7	6.7
Temperature (°C)	10.36	10.22	10.18	10.2	10.13	10.06	9.96	10.09	10.11	10.13	10.18	10.1
Turbidity (ntu)	273	158	119	78.3	42.8	25.8	17.6	10.4	10.8	6.5	6.1	6.7
Depth to Water	9.49	9.49	9.49	9.49	9.49	9.49	9.49	9.49	9.49	9.49	9.49	9.49
DTP	9.485	9.485	-	-	-	-	-	-	-	-	-	-
Salinity												
TDS												

**Notes:**           \* 0.005 ft product in well (LNAPL)            
          1030 - initiate purge            
          1125 - finish purge, collect samples            
          - purged ~5.5 gallons, sight sheen on water

## **APPENDIX C**

### Data Usability Summary Report

# Data Validation Services

120 Cobble Creek Road P. O. Box 208

North Creek, N. Y. 12853

Phone 518-251-4429

Facsimile 518-251-4428

August 11, 2006

Jeremy Wyckoff  
Malcolm Pirnie, Inc.  
43 British American Blvd  
Latham, NY 12110

RE: Former D&H Rail Yard site  
Data Usability Summary Report (DUSR)  
Mitekem SDG Nos. E0554, E0575, E0616, E0661, E0677, and E0750

Dear Mr. Wyckoff:

Review has been completed for the data packages generated by Mitekem Laboratories that pertain to samples collected at the Former D&H Rail Yard site. Fifty-six soil samples and (including two field duplicates) were processed for TCL semivolatiles, and TAL metals. Twenty-nine of those soil samples were also analyzed for TCL volatiles, and one soil sample was also analyzed for TCL PCBs. One soil sample was processed only for TCL volatiles. Fifteen aqueous samples (including one field duplicate) were analyzed for TCL volatiles, TCL semivolatiles, and TAL metals; one of these was also processed for filtered metals. Field and trip blanks were also analyzed. Methodologies utilized are those of the USEPA SW846 6000/7000/8000, with additional requirements of the NYSDEC ASP.

The data packages submitted contained full deliverables for validation, but this usability report is primarily generated from review of the summary form information, with full review of sample raw data, and limited review of associated QC raw data. Full validation has not been performed. However, the reported summary forms have been reviewed for application of validation qualifiers, per the USEPA Region 2 validation SOPs and the USEPA National Functional Guidelines for Data Review, with consideration for the specific method and ASP requirements. The following items were reviewed:

- \* Laboratory Narrative Discussion
- \* Case Narratives
- \* Custody Documentation
- \* Holding Times
- \* Surrogate and Internal Standard Recoveries
- \* Matrix Spike Recoveries/Duplicate Correlations
- \* Field Duplicate Correlations
- \* Preparation/Calibration Blanks
- \* Matrix Spiked Blanks/Laboratory Control Samples
- \* Instrumental Tunes

- \* Calibration Standards
- \* ICP Interference Check Standards
- \* ICP Serial Dilution Correlations
- \* Method Compliance
- \* Sample Result Verification

Those items listed above which show deficiencies are discussed within the text of this narrative. All of the other items were determined to be acceptable for this level of review.

**In summary**, results for most of the samples are usable as reported, or usable with minor qualification due to sample matrix or to processing outliers. The exception is that results for between one and four volatile or semivolatile analytes are not usable in several samples. Many of the soil metals results are qualified as estimated due to apparent matrix effects. There are some instances of non-compliant processing, some of which resulted in qualified data. These items are discussed below.

Copies of the laboratory case narratives are attached to this text, and should be reviewed in conjunction with this report. Also included with this report are validation qualifier definitions and red-ink qualified sample results forms.

The following text discusses quality issues of concern.

### **General**

Blind field duplicate correlations for ORC-SS-06, ORC-SB-19(6-7), and ORC-MW-05 are all within validation guidelines.

Samples referenced in this report utilize the laboratory client ID, which do not always include hyphens and commas reflected on the custody forms.

All results for samples ORC-SD01, ORC-SD03, ORC-SD04, ORC-SD05, and ORC-SD06 are qualified as estimated ("UJ"/"J") due to high moisture content (60% to 76%). High moisture content can be responsible for non-homogeneity or processing variances.

Laboratory case narratives are not identified with the corresponding data package SDG numbers.

### **TCL Volatiles by EPA 8260B**

The results for twenty compounds in SB08515, SB1534, and SB1612 are qualified as estimated ("UJ" or "J") due to low response of the associated internal standard. These outlying values were not noted by the laboratory, and the samples were not re-analyzed to confirm a matrix effect. The affected compounds are 1,1,2,2-tetrachloroethane, bromobenzene, 1,2,3-trichloropropane, n-propylbenzene, 2-chlorotoluene, 1,3,5-trimethylbenzene, 4-chlorotoluene, tert-butylbenzene, 1,2,4-trimethylbenzene, sec-butylbenzene, 4-isopropylbenzene, 1,3-dichlorobenzene, 1,4-dichlorobenzene, n-butylbenzene, 1,2-dichlorobenzene, 1,2-dibromo-3-chloropropane, 1,2,4-trichlorobenzene, hexachlorobutadiene, naphthalene, 1,2,3-trichlorobenzene.

Bromomethane results for ten samples reported in SDG E0575 are rejected (“R”), and not usable, due to recovery below 10% in the associated spiked control. Although that value is within the laboratory acceptance range, it shows inadequate instrumental response to confirm the presence or absence in the project samples. The affected samples are SB034455, SB051011, SB0612, SB066575, SB0756, SB0856, SB0923, SB1012, SB111312, SB124344

Results for sample analytes initially reported with the “E” flag are to be derived from the dilution (“-DL”) analyses of the samples. All other target analyte results can be derived from the initial analyses.

Results for analytes derived from the dilution analysis of SB07105115 are qualified as estimated (“J”), as that analysis was conducted two days beyond the allowable holding time. This non-compliance was not noted by the laboratory in the case narrative.

The detected results for SB07105115 are to be qualified as estimated (“J”) due to an elevated surrogate standard recovery in the sample.

The following target analyte detections are edited to reflect non-detection due to presence in associated method, rinse, and/or trip blanks:

- Methylene chloride flagged as “B” by the laboratory
- Hexachlorobutadiene and detections of naphthalene up to the reporting limit in the aqueous samples collected 5/23/06 and 5/24/06
- Chloroform detections and detections of naphthalene up to the reporting limit for samples reported in SDG E0575

Matrix spikes of SB1012 show acceptable recoveries and correlations, with the exception that vinyl chloride failed to recover in one of the spikes. The result for that compound in the parent sample is rejected (“R”).

Aqueous matrix spikes of ORC-MW-11 show acceptable accuracy and precision.

Tentatively Identified Compounds (TICs) flagged as “B” by the laboratory are considered external contamination (indicated by presence in associated blanks), and are rejected as sample components.

### **Semivolatile Analyses by EPA8270C**

All results for ORC-SS01 and ORC-SS14 are qualified as estimated (“UJ”/“J”), with a low bias, due to low recoveries for multiple acid and base/neutral surrogate standards in the samples. The recoveries in the re-extractions were acceptable, but they occurred beyond the required holding time, and may therefore also show losses.

Results for the base/neutral compounds in SB066575 and SB124344 are qualified as estimated (“UJ”/“J”), with a low bias, due to low recoveries for multiple base/neutral surrogate standards in the sample. The recoveries in the re-extractions were acceptable, but they occurred beyond the required holding time, and those results may therefore also reflect losses.

The results for base/neutral detected compounds in SB1478 are qualified as estimated (“J”) due to elevated surrogate recoveries.

The following samples produced outlying low internal standard responses, and the results for associated compounds are to be qualified as estimated (“J”/“UJ”). The following compounds are affected:

- di-n-octylphthalate, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(a)pyrene, indeno(1,2,3-cde)pyrene, dibenz(a,h)anthracene, and benzo(g,h,i)perylene in ORC-SS06, ORC-SSX, ORC-SD06, SB1378, and ORC-SS-18
- pyrene, butylbenzylphthalate, 3,3-dichlorobenzidine, benzo(a)anthracene, chrysene, di-n-octylphthalate, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(a)pyrene, indeno(1,2,3-cd)pyrene, dibenz(a,h)anthracene, and benzo(g,h,i)perylene in SB1534 unless from dilution, SB1778, SB182535, ORC-SS16, SB141213, and SB1478 (use only initial, not dilutions, of this sample)
- 4,6-dinitro-2-methylphenol, n-nitrosodiphenylamine, 4-bromophenylphenyl ether, hexachlorobenzene, pentachlorophenol, phenanthrene, carbazole, anthracene, di-n-butylphthalate, fluoranthene, pyrene, butylbenzylphthalate, 3,3-dichlorobenzidine, benzo(a)anthracene, chrysene, di-n-octylphthalate, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(a)pyrene, indeno(1,2,3-cde)pyrene, dibenz(a,h)anthracene, and benzo(g,h,i)perylene analytes in ORC-SS03

Elevated internal responses observed in samples reported in SDG E0661 do not affect reported results, as they show no detection of associated compounds.

Results for sample analytes initially reported with the “E” flag are to be derived from the dilution (“-DL”) analyses of the samples. All other target analyte results can be derived from the initial analyses.

The matrix spikes of ORC-SD-02 show recoveries below 10% for hexachlorocyclopentadiene, 4,6-dinitro-2-methylphenol, 2,4-dinitrophenol, and 3,3'-dichlorobenzidine. Therefore, results for these compounds in the parent sample are rejected (“R”).

The matrix spikes of ORC-MW-11 show recoveries below 10% for 2,4-dimethylphenol. The associated LCS also showed low recovery (8%). Therefore, the results for this compound in the samples reported in SDG E0677 are therefore rejected (“R”).

Matrix spikes of SB1012 show acceptable accuracy and precision.

Calibrations standard responses were within laboratory and validation guidelines, with the following exceptions, results for which are to be qualified as estimated (“J”/“UJ”) in the indicated samples:

- Hexachlorocyclopentadiene and 2,4-dinitrophenol (30%RSD to 38%RSD) in the samples reported in SDG E0554
- Hexachlorocyclopentadiene (33%RSD to 34%RSD) in the aqueous samples

Tentatively Identified Compounds (TICs) flagged as “B” or “A” by the laboratory are considered external contamination (indicated by presence in associated blanks), and results should be rejected as sample components.

Holding times from VTSR were exceeded for three aqueous samples, but technical holding times were met due to fast transit to the laboratory. The non-compliance was not noted in the laboratory case narrative.



**TCL PCBs by 8082**

Holding times were met, surrogate recoveries are within recommended limits, and blanks show no contamination.

Instrument processing was compliant (with the exception of an elevated baseline response on one of the initial calibration columns-sample results are unaffected).

**TAL Metals by 6010B and 74707471**

The matrix spike and duplicate of ORC-SD02 show outlying recoveries for four elements (antimony, cadmium, selenium, and thallium). Additionally, manganese was not evaluated with the matrix spike/duplicate. Therefore, the results for these five analytes are therefore qualified as estimated ("UJ"/"J") in the samples reported in SDG E0554, with possible low biases.

Matrix spikes of ORC-SS08 and SB1012 both show low recoveries for antimony and selenium. Additionally, manganese was not evaluated with the matrix spike/duplicate. Results for these three elements in the samples reported in SDG E0575 are therefore qualified as estimated ("UJ"/"J").

The matrix spike and duplicate of ORC-SB1612 show outlying low recoveries for four elements (antimony, arsenic, selenium, and thallium). Additionally, manganese was not evaluated with the matrix spike/duplicate. Therefore, the results for these five analytes are therefore qualified as estimated ("UJ"/"J") in the samples reported in SDG E0616, with possible low biases.

The matrix spike/duplicates of ORC-MW-11, and those for mercury in ORC-SS15 show acceptable accuracy and precision.

The ICP serial dilution evaluation of ORC-SD02 shows outlying correlations for thirteen elements (13%D to 33%D), and detected results for the affected elements (arsenic, barium, beryllium, chromium, cobalt, lead, magnesium, manganese, nickel, potassium, selenium, vanadium, and zinc) in the samples reported in SDG E0554 are qualified as estimated ("J").

The ICP serial dilution evaluation of ORC-SB102 shows outlying correlations for thirteen elements (11%D to 29%D), and detected results for the affected elements (arsenic, antimony, barium, beryllium, cadmium, chromium, cobalt, lead, magnesium, manganese, nickel, potassium, selenium, vanadium, and zinc) in the samples reported in SDG E0575 are qualified as estimated ("J").

The ICP serial dilution evaluation of ORC-SS08, also reported in SDG E0575, shows outlying correlations for ten elements (12%D to 35%D), all of which are already qualified as estimated ("J") due to the outliers noted above.

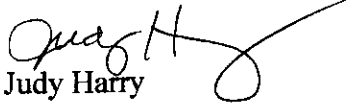
The ICP serial dilution evaluation of SB1612 shows outlying correlations for six elements (cadmium, cobalt, lead, magnesium, vanadium, and zinc) (11%D to 43%D), and detected results for the affected elements in the samples reported in SDG E0616 are qualified as estimated ("J").

The ICP serial dilution evaluation of ORC-MW-11 is acceptable.

Although required by the protocols, no low level metal CRI/CRA standards were processed. Therefore, the instrument sensitivity is not properly evaluated. Although no qualification is made, reporting limits and low-level detections may have a bias of unknown direction and degree.

Please do not hesitate to contact me if you have comments or questions regarding this report.

Very truly yours,

  
Judy Harry

Att

## **VALIDATION QUALIFIER DEFINITIONS**

## DATA QUALIFIER DEFINITIONS

The following definitions provide brief explanations of the national qualifiers assigned to results in the data review process. If the Regions choose to use additional qualifiers, a complete explanation of those qualifiers should accompany the data review.

- U** - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
- J** - The analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample.
- N** - The analysis indicates the present of an analyte for which there is presumptive evidence to make a "tentative identification."
- NJ** - The analysis indicates the presence of an analyte that has been "tentatively identified" and the associated numerical value represents its approximate concentration.
- UJ** - The analyte was not detected above the reported sample quantitation limit. However, the reported quantitation limit is approximate and may or may not represent the actual limit of quantitation necessary to accurately and precisely measure the analyte in the sample.
- R** - The sample results are rejected due to serious deficiencies in the ability to analyze the sample and meet quality control criteria. The presence or absence of the analyte cannot be verified.

## **LABORATORY SAMPLE IDs AND CASE NARRATIVES**

# Mitkem Corporation

## New York State Department of Environmental Conservation Sample Identification and Analytical Requirements Summary

Project Name : D&H Rail Yard

SDG : E0554

Customer Sample ID	Laboratory Sample ID	Analytical Requirements				
		MSVOA Method #	MSSEMI Method #	GC* Method #	ME	Other
JRCSD01	E0554-01		SW8270C_S		SW6010B_S	
JRCSD01	E0554-01				SW7471A	
JRCSD02	E0554-02		SW8270C_S		SW6010B_S	
JRCSD02	E0554-02				SW7471A	
JRCSD03	E0554-03		SW8270C_S		SW6010B_S	
JRCSD03	E0554-03				SW7471A	
JRCSD04	E0554-04		SW8270C_S		SW6010B_S	
JRCSD04	E0554-04				SW7471A	
JRCSD05	E0554-05		SW8270C_S		SW6010B_S	
JRCSD05	E0554-05				SW7471A	
JRCSD06	E0554-06		SW8270C_S		SW6010B_S	
JRCSD06	E0554-06				SW7471A	
JRCSD07	E0554-07		SW8270C_S		SW6010B_S	
JRCSD07	E0554-07				SW7471A	
JRCSS01	E0554-08		SW8270C_S	SW8082_S	SW6010B_S	
JRCSS01	E0554-08				SW7471A	
JRCSS02	E0554-09		SW8270C_S		SW6010B_S	
JRCSS02	E0554-09				SW7471A	
JRCSS03	E0554-10		SW8270C_S		SW6010B_S	
JRCSS03	E0554-10				SW7471A	
JRCSS04	E0554-11		SW8270C_S		SW6010B_S	
JRCSS04	E0554-11				SW7471A	
JRCSS05	E0554-12		SW8270C_S		SW6010B_S	
JRCSS05	E0554-12				SW7471A	
JRCSS06	E0554-13		SW8270C_S		SW6010B_S	
JRCSS06	E0554-13				SW7471A	
JRCSS07	E0554-14		SW8270C_S		SW6010B_S	
JRCSS07	E0554-14				SW7471A	
JRCSD08	E0554-15		SW8270C_S		SW6010B_S	
JRCSD08	E0554-15				SW7471A	
JRCSSX	E0554-16		SW8270C_S		SW6010B_S	
JRCSSX	E0554-16				SW7471A	
B01515	E0554-17	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
B01515	E0554-17				SW7471A	
B016570	E0554-18	SW8260B_LOW_S				

# Mitkem Corporation

## New York State Department of Environmental Conservation Sample Identification and Analytical Requirements Summary

Project Name : D&H Rail Yard

SDG : E0575

Customer Sample ID	Laboratory Sample ID	Analytical Requirements				
		MSVOA Method #	MSSEMI Method #	GC* Method #	ME	Other
JRCSS08	E0575-01		SW8270C_S		SW6010B_S	
JRCSS08	E0575-01				SW7471A	
B027585	E0575-02	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
B027585	E0575-02				SW7471A	
B034455	E0575-03	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
B034455	E0575-03				SW7471A	
B0412	E0575-04	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
B0412	E0575-04				SW7471A	
B0467	E0575-05	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
B0467	E0575-05				SW7471A	
JRCSS09	E0575-06		SW8270C_S		SW6010B_S	
JRCSS09	E0575-06				SW7471A	
B051011	E0575-07	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
B051011	E0575-07				SW7471A	
B0612	E0575-08	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
B0612	E0575-08				SW7471A	
B066575	E0575-09	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
B066575	E0575-09				SW7471A	
JRCSS10	E0575-10		SW8270C_S		SW6010B_S	
JRCSS10	E0575-10				SW7471A	
B0756	E0575-11	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
B0756	E0575-11				SW7471A	
B07105115	E0575-12	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
B07105115	E0575-12				SW7471A	
RCSS11	E0575-13		SW8270C_S		SW6010B_S	
RCSS11	E0575-13				SW7471A	
B08515	E0575-14	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
B08515	E0575-14				SW7471A	
B0856	E0575-15	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
B0856	E0575-15				SW7471A	
RCSS12	E0575-16		SW8270C_S		SW6010B_S	
RCSS12	E0575-16				SW7471A	
30923	E0575-17	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
30923	E0575-17				SW7471A	
RCSS13	E0575-18		SW8270C_S		SW6010B_S	
RCSS13	E0575-18				SW7471A	
31012	E0575-19	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
31012	E0575-19				SW7471A	

# Mitkem Corporation

## New York State Department of Environmental Conservation Sample Identification and Analytical Requirements Summary

Project Name : D&H Rail Yard

SDG : E0575

Customer Sample ID	Laboratory Sample ID	Analytical Requirements				
		MSVOA Method #	MSSEMI Method #	GC* Method #	ME	Other
3B111314	E0575-20	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
3B111314	E0575-20				SW7471A	
JRCSS14	E0575-21		SW8270C_S		SW6010B_S	
JRCSS14	E0575-21				SW7471A	
3B124344	E0575-22	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
3B124344	E0575-22				SW7471A	



# Mitkem Corporation

## New York State Department of Environmental Conservation Sample Identification and Analytical Requirements Summary

Project Name : D&H Rail Yard

SDG : E0616

Customer Sample ID	Laboratory Sample ID	Analytical Requirements				
		MSVOA Method #	MSSEMI Method #	GC* Method #	ME	Other
SB1378	E0616-01	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
SB1378	E0616-01				SW7471A	
ORCSS15	E0616-02		SW8270C_S		SW6010B_S	
ORCSS15	E0616-02				SW7471A	
SB1478	E0616-03	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
SB1478	E0616-03				SW7471A	
SB141213	E0616-04	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
SB141213	E0616-04				SW7471A	
SB1534	E0616-05	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
SB1534	E0616-05				SW7471A	
SB15910	E0616-06	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
SB15910	E0616-06				SW7471A	
SB1612	E0616-07	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
SB1612	E0616-07				SW7471A	
SB1695105	E0616-08	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
SB1695105	E0616-08				SW7471A	
SB1712	E0616-09	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
SB1712	E0616-09				SW7471A	
SB1778	E0616-10	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
SB1778	E0616-10				SW7471A	
ORCSS16	E0616-11		SW8270C_S		SW6010B_S	
ORCSS16	E0616-11				SW7471A	
SB182535	E0616-12	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
SB182535	E0616-12				SW7471A	
B1878	E0616-13	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
B1878	E0616-13				SW7471A	
B1967	E0616-14	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
B1967	E0616-14				SW7471A	
RCSS17	E0616-15		SW8270C_S		SW6010B_S	
RCSS17	E0616-15				SW7471A	
RCSBX2	E0616-16	SW8260B_LOW_S	SW8270C_S		SW6010B_S	
RCSBX2	E0616-16				SW7471A	

# Mitkem Corporation

## New York State Department of Environmental Conservation Sample Identification and Analytical Requirements Summary

Project Name : D&H Rail Yard

SDG : E0661

Customer Sample ID	Laboratory Sample ID	Analytical Requirements				
		MSVOA Method #	MSSEMI Method #	GC* Method #	ME	Other
JRC-MW-01	E0661-01	SW8260B_W	SW8270C_W		SW6010B_W	
JRC-MW-01	E0661-01				SW7470A	
JRC-MW-02	E0661-02	SW8260B_W	SW8270C_W		SW6010B_W	
JRC-MW-02	E0661-02				SW7470A	
JRC-MW-03	E0661-03	SW8260B_W	SW8270C_W		SW6010B_W	
JRC-MW-03	E0661-03				SW7470A	
JRC-MW-04	E0661-04	SW8260B_W	SW8270C_W		SW6010B_W	
JRC-MW-04	E0661-04				SW7470A	
JRC-MW-05	E0661-05	SW8260B_W	SW8270C_W		SW6010B_W	
JRC-MW-05	E0661-05				SW7470A	
JRC-MW-X	E0661-06	SW8260B_W	SW8270C_W		SW6010B_W	
JRC-MW-X	E0661-06				SW7470A	
JRC-MW-07	E0661-07	SW8260B_W	SW8270C_W		SW6010B_W	
JRC-MW-07	E0661-07				SW7470A	
RIP BLANK	E0661-08	SW8260B_W				

# Mitkem Corporation

## New York State Department of Environmental Conservation Sample Identification and Analytical Requirements Summary

Project Name : D&H Rail Yard

SDG : E0677

Customer Sample ID	Laboratory Sample ID	Analytical Requirements				
		MSVOA Method #	MSSEMI Method #	GC* Method #	ME	Other
JRC-MW-06	E0677-01	SW8260B_W	SW8270C_W		SW6010B_W	
JRC-MW-06	E0677-01				SW7470A	
JRC-MW-08	E0677-02	SW8260B_W	SW8270C_W		SW6010B_W	
JRC-MW-08	E0677-02				SW7470A	
JRC-MW-11	E0677-03	SW8260B_W	SW8270C_W		SW6010B_W	
JRC-MW-11	E0677-03				SW7470A	
RIP BLANK	E0677-04	SW8260B_W				
JRC-MW-12	E0677-05	SW8260B_W	SW8270C_W		SW6010B_W	
JRC-MW-12	E0677-05				SW7470A	
JRC-MW-13	E0677-06	SW8260B_W	SW8270C_W		SW6010B_W	
JRC-MW-13	E0677-06				SW7470A	
JRC-MW-14	E0677-07	SW8260B_W	SW8270C_W		SW6010B_W	
JRC-MW-14	E0677-07				SW7470A	
JRC-MW-09	E0677-08	SW8260B_W	SW8270C_W		SW6010B_W	
JRC-MW-09	E0677-08				SW7470A	
JRC-MW-10	E0677-09	SW8260B_W	SW8270C_W		SW6010B_W	
JRC-MW-10	E0677-09				SW6010B_W	
JRC-MW-10	E0677-09				SW7470A	
JRC-MW-10	E0677-09				SW7470A	
JRC-MW-10	E0677-09				SW7470A	
RC-FB-01	E0677-10	SW8260B_W	SW8270C_W		SW6010B_W	
RC-FB-01	E0677-10				SW7470A	
B0524	E0677-11	SW8260B_W				

# Mitkem Corporation

## New York State Department of Environmental Conservation Sample Identification and Analytical Requirements Summary

Project Name : D&H Rail Yard

SDG : E0750

Customer Sample ID	Laboratory Sample ID	Analytical Requirements				
		MSVOA Method #	MSSEMI Method #	GC* Method #	ME	Other
ORC-SS-18	E0750-01		SW8270C_S		SW6010B_S	
ORC-SS-18	E0750-01				SW7471A	

## SDG Narrative

Mitkem Corporation submits the enclosed data package in response to Malcolm Pirnie's Former D & H Rail Yard, ORC Property project. Under this deliverable, analysis results are presented for eighteen soil samples that were received on April 29, 2006. Analyses were performed per specifications in the project's contract and the chain of custody form. Sample Identifications were shortened where necessary due to limitations in data reporting software. Following the narrative is a table of sample identifications for cross-referencing full client sample ID, shortened client sample ID and laboratory sample ID, along with the Mitkem Work Order.

The analyses were performed according to NYSDEC ASP protocols (October 1995 update) and reported per NYSDEC ASP requirement for Category B deliverable.

The following observation and/or deviations are observed for the following analyses:

### 1. Overall Observation:

Where needed, manual integrations were performed to improve data quality. The corrections were reviewed and associated hardcopies generated and reported as required. Manual integrations are coded to provide the data reviewer justification for such action. The codes are labeled on the ion chromatogram signal (GC/MS signal) and chromatogram for GC based analysis as follows:

- M1 peak tailing or fronting.
- M2 peak co-elution.
- M3 rising or falling baseline.
- M4 retention time shift.
- M5 miscellaneous – under this category, the justification is explained.

The enclosed report includes the originals of all data with the exception of logbook pages and certain initial calibrations. Photocopies of logbook pages are included, with the originals maintained on file at the laboratory. The originals of initial calibrations that are shared among several cases are maintained on file at the laboratory, with photocopies included in the data package.

### 2. Volatile Analysis:

Surrogate recovery: recoveries were within the QC limits.

Lab control sample/lab control sample duplicate: spike recoveries and replicate RPDs were within the QC limits.

Sample analysis: no unusual observation was made for the analysis.

### 3. Semivolatile Analysis:

Alkanes were determined as part of tentatively identified compounds. The alkanes are reported on the Alkane Narrative Report following the SDG narrative.

Surrogate recovery: recoveries were within the QC limits with the exception of the following: marginally low recovery of 2,4,6-tribromophenol in sample SB01515, high recovery of terphenyl-d14 in samples ORCSS06 and ORCSSX, low recovery of terphenyl-d14 in samples ORCSS04, ORCSD03, ORCSS02, ORCSD02 and ORCSD02MSD, high recovery of 2,4,6-tribromophenol in lab control sample S3MLCS, high recovery of terphenyl-d14 and 2,4,6-tribromophenol in the lab control sample duplicate and low recovery of 2-fluorobiphenyl, terphenyl-d14, phenol-d5 and 2-fluorophenol in sample ORCSS01. Sample ORCSS01 was re-extracted and analyzed with surrogate recoveries within the QC limits.

Lab control sample: spike recoveries were within the QC limits with the exception of high recovery of 4-nitroaniline in S1DLCS, high recovery of 2,4-dimethylphenol, hexachlorocyclopentadiene, pentachlorophenol and 3,3'-dichlorobenzidine in S3MLCS and high recovery of 2,4-dimethylphenol, hexachlorocyclopentadiene and 3,3'-dichlorobenzidine in S3MLCSD.

Matrix spike/matrix spike duplicate: duplicate matrix spikes were performed on sample ORCSD02. Spike recoveries were within the QC limits with the exception of high recovery of 2,4-dimethylphenol and no or low recovery of hexachlorocyclopentadiene, 2,4-dinitrophenol, 4,6-dinitro-2-methylphenol, 3,3'-dichlorobenzidine and dibenzo (a,h) anthracene in the matrix spike and of high recovery of 2,4-dimethylphenol, phenanthrene and benzo (b) fluoranthene and low recovery of hexachlorocyclopentadiene, 2,4-dinitrophenol, 4,6-dinitro-2-methylphenol and 3,3'-dichlorobenzidine in the matrix spike duplicate. Replicate RPDs were within the QC limits. Please note that the spike recovery for fluoranthene could not be accurately determined due to its high concentration in the native sample.

Sample analysis: internal standard area counts were within QC criteria with the exception of samples ORCSD06, ORCSS06, ORCSSX, ORCSD02MS, ORCSD02MSD and ORCSS03. Sample ORCSS01 was re-extracted outside of hold time. The initial extraction was performed within hold time, but had non-compliant surrogate recoveries. Due to sample matrix, the following samples had an extract final volume of 5mL rather than the normal 1mL final volume: ORCSD04 and ORCSS03. This is equivalent to 5x dilution. Due to the high

concentration of target analytes, sample ORCSS04 was re-analyzed at 4x dilution. No other unusual observation was made for the analysis.

#### 4. PCB Analysis

Surrogate recovery: recoveries were within the QC limits.

Lab control sample/lab control sample duplicate: spike recoveries and replicate RPDs were within the QC limits.

Sample analysis: no unusual observation was made for the analysis.

#### 5. Metals Analysis:

Lab control sample: spike recoveries were within the QC limits.

Matrix spike: matrix spike was performed on sample ORCSD02. Spike recoveries were within the QC limits with the exception of antimony, cadmium, selenium and thallium. Antimony, cadmium, selenium and thallium are flagged with an "N" on the data report forms. A post digest spike was performed for antimony, cadmium, selenium and thallium. Spike recoveries were within the QC limits in the post digest spike for antimony and selenium. The spike recoveries for cadmium and thallium are outside of QC limits due to interferences from the high concentration of calcium and iron in the sample.

Duplicate: duplicate analysis was performed on sample ORCSD02. Replicate RPDs were within the QC limits with the exception of magnesium. Magnesium is flagged with an "\*" on the data report forms.

Sample analysis: serial dilution was performed on sample ORCSD02. Percent differences were within the QC limits with the exception of arsenic, barium, beryllium, chromium, cobalt, iron, lead, magnesium, manganese, nickel, potassium selenium vanadium and zinc. These elements are qualified with an "E" on the data report forms. No other unusual observation was made for the analysis.

All pages in this report have been numbered consecutively, starting with the title page and ending with a page saying only "Last Page of Data Report".

I certify that this data package is in compliance, both technically and for completeness, for other than the conditions detailed above. Release of the data contained in this hardcopy data

package has been authorized by the laboratory manager or his designee, as verified by the following signature.

A handwritten signature in black ink, appearing to read 'Agnes Ng' with a stylized flourish at the end.

Agnes Ng  
CLP Project Manager  
05/27/06



## SDG Narrative

Mitkem Corporation submits the enclosed data package in response to Malcolm Pirnie's Former D & H Rail Yard, ORC Property project. Under this deliverable, analysis results are presented for twenty-two soil samples that were received on May 4 and 6, 2006. Analyses were performed per specifications in the project's contract and the chain of custody form. Sample Identifications were shortened where necessary due to limitations in data reporting software. Following the narrative is a table of sample identifications for cross-referencing full client sample ID, shortened client sample ID and laboratory sample ID, along with the Mitkem Work Order.

The analyses were performed according to NYSDEC ASP protocols (October 1995 update) and reported per NYSDEC ASP requirement for Category B deliverable.

The following observation and/or deviations are observed for the following analyses:

### 1. Overall Observation:

Where needed, manual integrations were performed to improve data quality. The corrections were reviewed and associated hardcopies generated and reported as required. Manual integrations are coded to provide the data reviewer justification for such action. The codes are labeled on the ion chromatogram signal (GC/MS signal) and chromatogram for GC based analysis as follows:

- M1 peak tailing or fronting.
- M2 peak co-elution.
- M3 rising or falling baseline.
- M4 retention time shift.
- M5 miscellaneous – under this category, the justification is explained.

The enclosed report includes the originals of all data with the exception of logbook pages and certain initial calibrations. Photocopies of logbook pages are included, with the originals maintained on file at the laboratory. The originals of initial calibrations that are shared among several cases are maintained on file at the laboratory, with photocopies included in the data package.

## 2. Volatile Analysis:

Surrogate recovery: recoveries were within the QC limits with the exception of high recovery of bromofluorobenzene in sample SB07105115. The sample was re-analyzed at dilution with surrogate recoveries within the QC limits.

Lab control sample/lab control sample duplicate: spike recoveries were within the QC limits with the exception of low recovery of vinyl chloride and high recovery of bromomethane and 2-hexanone in V1JLCS. Replicate RPDs were within the QC limits.

Matrix spike/matrix spike duplicate: duplicate matrix spikes were performed on sample SB1012. Spike recoveries were within the QC limits with the exception of low recovery of vinyl chloride and high recovery of 1,1,1,2-tetrachloroethane in the matrix spike. Replicate RPDs were within the QC limits with the exception of vinyl chloride.

Sample analysis: internal standard area counts were within QC criteria with the exception of sample SB08515. Due to high concentration of target analytes, sample SB07105115 was re-analyzed at dilution using about 1g of sample. This is equivalent to 5x dilution. No other unusual observation was made for the analysis.

## 3. Semivolatile Analysis:

Alkanes were determined as part of tentatively identified compounds. The alkanes are reported on the Alkane Narrative Report following the SDG narrative.

Surrogate recovery: recoveries were within the QC limits with the exception of the following: low recovery of 2-fluorobiphenyl in sample SB07105115, low recovery of 2-fluorobiphenyl and terphenyl-d14 in sample SB066575, low recovery of 2,4,6-tribromophenol in sample SB0412, low recovery of nitrobenzene-d5, 2-fluorobiphenyl and 2-fluorophenol in sample SB124344 and low recovery of all surrogates in sample ORCSS14. Samples SB066575, SB124344 and ORCSS14 were re-extracted and analyzed with surrogate recoveries within the QC limits.

Lab control sample: spike recoveries were within the QC limits with the exception of high recovery of dibenzo (a,h) anthracene in S3NLCS, low recovery of pyrene and di-n-octylphthalate in S3PLCS and high recovery of 2,4-dimethylphenol in lab control sample S4FLCS and its duplicate. Replicate RPDs were within the QC limits.

Matrix spike/matrix spike duplicate: duplicate matrix spikes were performed on sample SB1012. Spike recoveries and replicate RPDs were within the QC limits.

Sample analysis: samples ORCSS14, SB066575 and SB124344 were re-extracted outside of hold time. The initial extractions were performed within hold time, but had non-compliant

surrogate recoveries. Due to the high concentration of target analytes, sample SB07105115 was re-analyzed at 4x dilution. No other unusual observation was made for the analysis.

#### 4. Metals Analysis:

Due to the large number of samples, they are presented in two sub-SDGs, ME0575 and ME0575A. All raw data may be found following Form 14 of SDG ME0575A.

Lab control sample: spike recoveries were within the QC limits.

Matrix spike: matrix spike was performed on samples ORCSS08 and SB1012. Spike recoveries were within the QC limits with the exception of antimony and selenium for samples ORCSS08 and SB1012. Antimony and selenium are flagged with an "N" on the data report forms. A post digest spike was performed for antimony and selenium for both samples with spike recoveries within the QC limits for both antimony and selenium for sample ORCSS08 and antimony for sample SB1012. Selenium recovery was low in the post digest spike for sample SB1012.

Duplicate: duplicate analysis was performed on samples ORCSS08 and SB1012. Replicate RPDs were within the QC limits with the exception of calcium and magnesium for ORCSS08 and antimony for sample SB1012. Calcium, magnesium and antimony are flagged with an "\*" on the data report forms.

Sample analysis: serial dilution was performed on samples ORCSS08 and SB1012. Percent differences were within the QC limits with the exception of barium. Cadmium, chromium, cobalt, copper, lead, magnesium, manganese, nickel, vanadium and zinc for sample ORCSS08 and aluminum, arsenic, barium, beryllium, cadmium, calcium, chromium, cobalt, lead, magnesium, manganese, nickel, vanadium and zinc for sample SB1012. These elements are qualified with an "E" on the data report forms. Aluminum, calcium, iron and magnesium were detected in method blank, MB-23624. Please note the concentration of these elements in the samples with the exception of sample SB0856 are at least ten times greater than the concentration in the blank, indicating that laboratory contamination did not significantly impact these samples. The concentration of these elements in sample SB0856 is nine times greater than the concentration in the method blank. No other unusual observation was made for the analysis.

#### 5. Metals Analysis (SDG ME0575A):

Lab control sample: spike recoveries were within the QC limits.

Sample analysis: no unusual observation was made for the analysis.

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I certify that this data package is in compliance, both technically and for completeness, for other than the conditions detailed above. Release of the data contained in this hardcopy data package has been authorized by the laboratory manager or his designee, as verified by the following signature.

A handwritten signature in black ink, appearing to read "Agnes Ng". The signature is stylized with a large, looped "A" and "N".

Agnes Ng  
CLP Project Manager  
05/27/06

## 2. Volatile Analysis:

Surrogate recovery: recoveries were within the QC limits.

Lab control sample/lab control sample duplicate: spike recoveries and replicate RPDs were within the QC limits.

Sample analysis: internal standard area counts were within QC criteria with the exception of samples SB1534 and SB1612. The samples were not re-analyzed for non-compliant internal standard area counts as surrogates were within the QC limits. No other unusual observation was made for the analysis.

## 3. Semivolatile Analysis:

Alkanes were determined as part of tentatively identified compounds. The alkanes are reported on the Alkane Narrative Report following the SDG narrative.

Surrogate recovery: recoveries were within the QC limits with the exception of the following: high recovery of terphenyl-d14 in sample ORCSS16, SB141213, SB1534 and SB1778 and high recovery of nitrobenzene-d5, 2-fluorobiphenyl and 2,4,6-tribromophenol in sample SB1478. Sample SB1478 was re-analyzed at dilution with internal standard area counts within the QC limits.

Lab control sample/lab control sample duplicate: spike recoveries and replicate RPDs were within the QC limits.

Sample analysis: internal standard area counts were within QC criteria with the exception of samples SB182535, SB1378, ORCSS16, SB-141213, SB1534 and SB1778. Sample SB1778 was re-analyze at dilution with similar findings. Sample SB1534 was re-analyzed at dilution with internal standard area counts within QC criteria. Due to sample matrix, samples SB1478 and SB1712 had extract final volumes of 10mL rather than the normal 1mL final volume. This is equivalent to 10x dilution. Due to the high concentration of target analytes, sample SB1534 was re-analyzed at 2x dilution. Sample SB1478 was re-analyzed at 4x dilution, overall 40x, to demonstrate matrix interference on surrogate recovery and not because target analytes exceeded the instrument calibration range. No other unusual observation was made for the analysis.

## 4. Metals Analysis:

Lab control sample: spike recoveries were within the QC limits.

Matrix spike: matrix spike was performed on sample SB1612 and sample ORCSS15 for mercury only. Spike recoveries were within the QC limits with the exception of antimony,


arsenic, selenium and thallium for sample SB1612. Antimony, arsenic, selenium and thallium are flagged with an "N" on the data report forms. A post digest spike was performed for antimony, arsenic, selenium and thallium with spike recoveries within the QC limits.

Duplicate: duplicate analysis was performed on sample SB1612 and ORCSS15. Replicate RPDs were within the QC limits with the exception of barium, cadmium, calcium, chromium, cobalt, copper, iron, manganese and nickel for sample SB1612. These elements are flagged with an "\*" on the data report forms.

Sample analysis: serial dilution was performed on sample SB1612. Percent differences were within the QC limits with the exception of cadmium, cobalt, magnesium, manganese, lead, vanadium and zinc. These elements are qualified with an "E" on the data report forms. No other unusual observation was made for the analysis.

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Agnes Ng  
CLP Project Manager  
05/30/06

## SDG Narrative

Mitkem Corporation submits the enclosed data package in response to Malcolm Pirnie's Former D & H Rail Yard, ORC Property project. Under this deliverable, analysis results are presented for sixteen soil samples that were received on May 11, 2006. Analyses were performed per specifications in the project's contract and the chain of custody form. Sample Identifications were shortened where necessary due to limitations in data reporting software. Following the narrative is a table of sample identifications for cross-referencing full client sample ID, shortened client sample ID and laboratory sample ID, along with the Mitkem Work Order.

The analyses were performed according to NYSDEC ASP protocols (October 1995 update) and reported per NYSDEC ASP requirement for Category B deliverable.

The following observation and/or deviations are observed for the following analyses:

### 1. Overall Observation:

Where needed, manual integrations were performed to improve data quality. The corrections were reviewed and associated hardcopies generated and reported as required. Manual integrations are coded to provide the data reviewer justification for such action. The codes are labeled on the ion chromatogram signal (GC/MS signal) and chromatogram for GC based analysis as follows:

- M1            peak tailing or fronting.
- M2            peak co-elution.
- M3            rising or falling baseline.
- M4            retention time shift.
- M5            miscellaneous – under this category, the justification is explained.

The enclosed report includes the originals of all data with the exception of logbook pages and certain initial calibrations. Photocopies of logbook pages are included, with the originals maintained on file at the laboratory. The originals of initial calibrations that are shared among several cases are maintained on file at the laboratory, with photocopies included in the data package.

## SDG Narrative

Mitkem Corporation submits the enclosed data package in response to Malcolm Pirnie's Former D & H Rail Yard, ORC Property project. Under this deliverable, analysis results are presented for eight aqueous samples that were received on May 23, 2006. Analyses were performed per specifications in the project's contract and the chain of custody form. Following the narrative is the Mitkem Work Order for cross-referencing client sample ID with laboratory sample ID.

The analyses were performed according to NYSDEC ASP protocols (October 1995 update) and reported per NYSDEC ASP requirement for Category B deliverable.

The following observation and/or deviations are observed for the following analyses:

### 1. Overall Observation:

Where needed, manual integrations were performed to improve data quality. The corrections were reviewed and associated hardcopies generated and reported as required. Manual integrations are coded to provide the data reviewer justification for such action. The codes are labeled on the ion chromatogram signal (GC/MS signal) and chromatogram for GC based analysis as follows:

- M1            peak tailing or fronting.
- M2            peak co-elution.
- M3            rising or falling baseline.
- M4            retention time shift.
- M5            miscellaneous – under this category, the justification is explained.

The enclosed report includes the originals of all data with the exception of logbook pages and certain initial calibrations. Photocopies of logbook pages are included, with the originals maintained on file at the laboratory. The originals of initial calibrations that are shared among several cases are maintained on file at the laboratory, with photocopies included in the data package.

### 2. Volatile Analysis:

Surrogate recovery: recoveries were within the QC limits.



Lab control sample/lab control sample duplicate: spike recoveries and replicate RPDs were within the QC limits.

Sample analysis: no unusual observation was made for the analysis.

### 3. Semivolatile Analysis:

Surrogate recovery: recoveries were within the QC limits.

Lab control sample/lab control sample duplicate: spike recoveries were within the QC limits with the exception of high recovery of chrysene and dibenzo (a,h) anthracene in the lab control sample. Replicate RPDs were within the QC limits.

Sample analysis: internal standard area counts were within QC criteria with the exception of samples ORC-MW-01, ORC-MW-03, ORC-MW-05 and ORC-MW-07. No other unusual observation was made for the analysis.

### 4. Metals Analysis:

Lab control sample: spike recoveries were within the QC limits.

Sample analysis: no unusual observation was made for the analysis.

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Agnes Ng  
CLP Project Manager  
06/12/06

## SDG Narrative

Mitkem Corporation submits the enclosed data package in response to Malcolm Pirnie's Former D & H Rail Yard, ORC Property project. Under this deliverable, analysis results are presented for eleven aqueous samples that were received on May 24 and 25, 2006. Analyses were performed per specifications in the project's contract and the chain of custody form, following discussions with the client. Following the narrative is the Mitkem Work Order for cross-referencing client sample ID with laboratory sample ID.

The analyses were performed according to NYSDEC ASP protocols (October 1995 update) and reported per NYSDEC ASP requirement for Category B deliverable.

The following observation and/or deviations are observed for the following analyses:

### 1. Overall Observation:

Where needed, manual integrations were performed to improve data quality. The corrections were reviewed and associated hardcopies generated and reported as required. Manual integrations are coded to provide the data reviewer justification for such action. The codes are labeled on the ion chromatogram signal (GC/MS signal) and chromatogram for GC based analysis as follows:

- M1 peak tailing or fronting.
- M2 peak co-elution.
- M3 rising or falling baseline.
- M4 retention time shift.
- M5 miscellaneous – under this category, the justification is explained.

The enclosed report includes the originals of all data with the exception of logbook pages and certain initial calibrations. Photocopies of logbook pages are included, with the originals maintained on file at the laboratory. The originals of initial calibrations that are shared among several cases are maintained on file at the laboratory, with photocopies included in the data package.

### 2. Volatile Analysis:

Surrogate recovery: recoveries were within the QC limits.

Lab control sample: spike recoveries were within the QC limits with the exception of high recovery of dichlorodifluoromethane, chloromethane, vinyl chloride and bromomethane.

Matrix spike/matrix spike duplicate: duplicate matrix spikes were performed on sample ORC-MW-11. Spike recoveries were within the QC limits with the exception of high recovery of tert-butylbenzene. Replicate RPDs were within the QC limits.

Sample analysis: no other unusual observation was made for the analysis.

### 3. Semivolatile Analysis:

Surrogate recovery: recoveries were within the QC limits with the exception of marginally high recovery of nitrobenzene-d5 in lab control sample S3HLCS.

Lab control sample: spike recoveries were within the QC limits with the exception of low recovery of 2,4-dimethylphenol and high recovery of nitrobenzene, hexachlorocyclopentadiene and dibenzo (a,h) anthracene.

Matrix spike/matrix spike duplicate: duplicate matrix spikes were performed on sample ORC-MW-11. Spike recoveries were within the QC limits with the exception of low recovery of 2,4-dimethylphenol and high recovery of chrysene and dibenzo (a,h) anthracene in the matrix spike and low recovery of 2,4-dimethylphenol and high recovery of hexachlorocyclopentadiene and dibenzo (a,h) anthracene in the matrix spike duplicate. Replicate RPDs were within the QC limits with the exception of 2,4-dinitrophenol.

Sample analysis: no other unusual observation was made for the analysis.

### 4. Metals Analysis (Total Analysis):

The metals analysis results are submitted in two sub-SDGs, ME0677 and ME0677F. The analysis results for the total metals analyses are submitted in SDG ME0677 and the filtered metals analyses are submitted in sample SDG ME0677F. The raw data for all the samples may be found following Form 14 of SDG ME0677F.

Lab control sample: spike recoveries were within the QC limits.

Matrix spike: matrix spike was performed on sample ORC-MW-11. Spike recoveries were within the QC limits.

Duplicate: duplicate analysis was performed on sample ORC-MW-11. Replicate RPDs were within the QC limits.

Sample analysis: serial dilution was performed on sample ORC-MW-11 with percent differences within the QC limits. No unusual observation was made for the analysis.

5. Metals Analysis (Filtered Analysis):

Lab control sample: spike recoveries were within the QC limits.

Sample analysis: no unusual observation was made for the analysis.

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Agnes Ng  
CLP Project Manager  
06/12/06

## SDG Narrative

Mitkem Corporation submits the enclosed data package in response to Malcolm Pirnie's Former D & H Rail Yard, ORC Property project. Under this deliverable, analysis results are presented for one soil sample that was received on June 7, 2006. Analyses were performed per specifications in the project's contract and the chain of custody form, following discussions with the client. Following the narrative is the Mitkem Work Order for cross-referencing client sample ID with laboratory sample ID.

The analyses were performed according to NYSDEC ASP protocols (October 1995 update) and reported per NYSDEC ASP requirement for Category B deliverable.

The following observation and/or deviations are observed for the following analyses:

### 1. Overall Observation:

Where needed, manual integrations were performed to improve data quality. The corrections were reviewed and associated hardcopies generated and reported as required. Manual integrations are coded to provide the data reviewer justification for such action. The codes are labeled on the ion chromatogram signal (GC/MS signal) and chromatogram for GC based analysis as follows:

- M1 peak tailing or fronting.
- M2 peak co-elution.
- M3 rising or falling baseline.
- M4 retention time shift.
- M5 miscellaneous – under this category, the justification is explained.

The enclosed report includes the originals of all data with the exception of logbook pages and certain initial calibrations. Photocopies of logbook pages are included, with the originals maintained on file at the laboratory. The originals of initial calibrations that are shared among several cases are maintained on file at the laboratory, with photocopies included in the data package.

### 2. Semivolatile Analysis:

Alkanes were determined as part of tentatively identified compounds. The alkanes are reported on the Alkane Narrative Report following the SDG narrative.

Surrogate recovery: recoveries were within the QC limits with the exception of high recovery of terphenyl-d14 in sample ORC-SS-18.

Lab control sample/lab control sample duplicate: spike recoveries were within the QC limits with the exception of high recovery of dibenzo (a,h) anthracene in the lab control sample and its duplicate. Replicate RPDs were within the QC limits.

Sample analysis: internal standard area counts were within QC criteria with the exception of sample ORC-SS-18. No other unusual observation was made for the analysis.

### 3. Metals Analysis:

Lab control sample: spike recoveries were within the QC limits.

Sample analysis: no unusual observation was made for the analysis.

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Agnes Ng  
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06/24/06

## **APPENDIX D**

### Laboratory Reporting Forms