

1) Applicant Identification

City of White Plains
255 Main Street
White Plains, NY 10601

2) Funding Requested

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$5,000,000

3) Location

City – White Plains
County – Westchester
State – New York

4) Property Information

White Plains Fire Department Drill School
1402 Old Orchard Street
White Plains, NY 10604

5) Contacts

a. Project Director

- Name: Commissioner Stefania Mignone
- Phone Number: 914-422-1210
- Email Address: smignone@whiteplainsny.gov
- Mailing Address:
City of White Plains
Department of Public Works
255 Main Street
White Plains, NY 10601

b. Highest Ranking Elected Official

- Name: Mayor Thomas Roach
- Phone Number: 914-422-1411
- Email Address: troach@whiteplainsny.gov
- Mailing Address:
City of White Plains
255 Main Street
White Plains, NY 10601

6) Population

City of White Plains Population 59,564 (2020 Decennial Census)

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7) Other Factors

Factor	Page #
Community population is 10,000 or less.	NA
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	NA
The proposed brownfield site is impacted by mine-scarred land.	NA
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	
The proposed site is adjacent to a body of water (i.e. the border of the proposed site is contiguous to the body of water, or would be contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The proposed site is in a federally designated flood plain.	
The reuse of the proposed cleanup site will facilitate renewable energy from wind, solar, or geothermal energy.	NA
The reuse of the proposed cleanup site will incorporate energy efficiency measures	
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	
The target area is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	NA

8) Releasing Copies of Applications

Not Applicable

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area

The City of White Plains, a diverse city of 59,000 people located 16 miles north of New York City, is applying for funding to address a brownfield site contaminated with perfluoroalkyl and polyfluoroalkyl substances (PFAS). PFAS are a group of man-made chemicals that have been widely used in various industrial and consumer products for their water- and oil-resistant properties. **The identified brownfield contamination precludes use of a public trail and complicates the City's plans to increase access to clean drinking water.** The contaminated site referenced in this application has never been open to public use. In order for the site to be safely used by the public, to prevent migration of PFAS into the reservoirs, and to restore the water to a state that would render it more easily treatable for consumption, the PFAs must be properly removed, treated, or capped.

The PFAS contamination has precluded **public use of an historic walking trail resource**. Green space exposure is associated with improved physical health outcomes, such as reduced heart rate; reduced blood pressure and incidence of diabetes and stroke; improved pregnancy outcomes, such as for pre-term births and healthy birth weight; and increased self-reported good health. These potential benefits are particularly compelling for historically **environmentally disadvantaged communities**. The City of White Plains includes three census tracts identified on the CEJST tool that meet the criteria for disadvantaged. Burdens noted in these census tracts are: *lack of green space*, traffic proximity and volume, linguistic isolation, low income and unemployment.

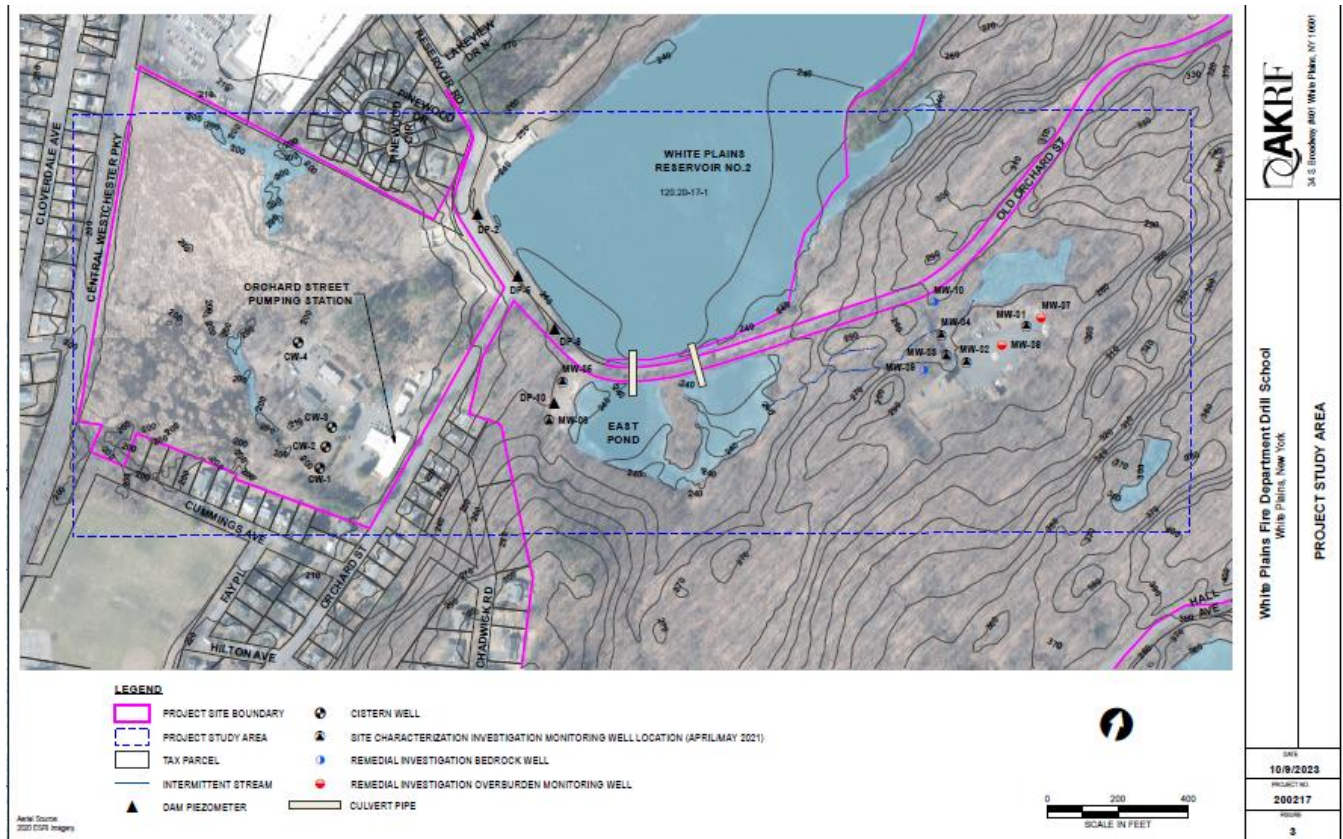
As a climate adaptation strategy, the City is in the process of securing funds to build a new water filtration plant that will allow "in-city" water supplies to be used for drinking water, building critical redundancy into the city's water supply system. Located within the brownfield site property is the City-owned Orchard Street Pump Station (OSPS). The OSPS includes two reservoirs and four cistern wells that until 2006 supplied drinking water to portions of the City. This in-city water supply can no longer be used because the City's existing microfiltration plant is inoperable and the wells require additional treatment from surface water effects. The current PFAS contamination complicates the City's strategy to **improve access to drinking water via in-city water supplies**. Eliminating PFAS as an additional contaminant that must be removed by the new water treatment plants will render those plants more efficient and cost-effective.

By providing vital resources necessary to clean up the PFAS contamination, this grant will help address the identified challenges and impacts by protecting the public health, promoting rehabilitation of a trail, and supporting access to clean drinking water.

ii. Description of the Proposed Brownfield Site

The specific target area for planned grant activities is the former White Plains Fire Department Drill School (FDDS) located at 1402 Old Orchard Street, White Plains, New York (the Site). The Site is owned by the City of White Plains (the City). The Site is 141 acres and is mainly wooded with small streams. The FDDS is situated within a 4-acre clearing that is located approximately 500 feet east of White Plains Reservoir No. 2 (See the below Figure 1). The Orchard Street Pumping Station (OSPS) property and its facilities, also owned and operated by the City, are located within the western portion of the Site, and south-adjacent to Reservoir No. 2. The low-lying wetland area west-adjacent to the OSPS and southwest-adjacent to Reservoir No. 2 is also located within the western portion of the Site. The legal definition of the Site is City of White Plains Tax ID 120.20- 17-1, and the property class is identified as Public Services-Water Supply. Although indicated as separate lots, these lots are included under the same Tax ID number.

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The fire department training center has been in operation at the Site since approximately 1960. Fire department training includes live fire training in several different scenarios. The burn building on the eastern side of the clearing allows for multi-floor, realistic live fire training in a scenario where heat and smoke-filled rooms can be controlled for safety. Small training fires using vehicles, pallets, and furniture were also utilized to understand and anticipate the burn tendencies for many real fire response situations. The historical aqueous film-forming foam (AFFF) usage by the fire department is summarized below:

- Mid-1960s to mid-1970s: 3M AFFF
- Mid-1970s to 1998: 3M AFFF&ATC
- 1998 to June 2014: Angus AR-FFFF
- June 2014 to present: National Universal Gold AR-AFFF

It should be noted that training with AFFF, or any other type of foam products for fire suppression, was discontinued at the FDDS in early 2020.

AFFF was reported to be used sparingly during the training scenarios, due to the cost of using foam versus water, but it was used on occasion. Near empty barrels of foam and residual foam left in a pump truck after live fire response were reported to be cleaned out and discharged to the ground near the hydrant location on the Site, which is north adjacent to the access road and west adjacent to the stream that runs below the FDDS access driveway at the Site.

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Two phases of Site Characterization Investigation (SCI), and one phase of Remedial Investigation (RI) were completed at the Site in accordance with NYSDEC-approved work plans. Two soil source areas were documented at the Site. The first included the direct discharge of fire suppression foam during firefighter training to the asphalt surface west of the burn building. The second included discharge of residual foam adjacent to the fire hydrant that is located east-adjacent to the Site access driveway. The rinsed material was reported to be discharged directly to the ground.

The conceptual site model includes fire suppression foam being applied at the asphalt area, entering the cracks in the asphalt and contacting the underlying soil and groundwater, and then flowing downgradient in groundwater to the stream below/perpendicular to the access driveway. The foam would also flow on the asphalt surface downgradient to the same location, which is also the foam drum cleanout area next to the fire hydrant along the access driveway. At this point, both source areas converge, and flow in the intermittent stream approximately 450 feet on exposed bedrock, or a thin layer of silt over bedrock, to East Pond. Surface water from East Pond flows through two large diameter pipes directly into Reservoir #2, and overflow from Reservoir #2 discharges into the low-lying wetland west-adjacent to the OSPS.

With the investigation phases wrapping up, the next steps are to move to the remedy phase, which is anticipated to include an Interim Remedial Measures Work Plan (IRMWP) to address the soil source area(s) while the full site remedy [Remedial Action Work Plan (RAWP)] is being prepared. With this approach, it's anticipated that the IRM work would be completed in 2024, and the full site remedy would be initiated by 2025. Each phase of the investigation and remediation is being conducted under oversight by the NYSDEC.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

The reuse strategy for the proposed site is to restore the Revolutionary War Heritage Trail as a trail and walking trail, providing a vital connection between two landmarks and closing a loop. White Plains played an important role in our nation's struggle for independence as British and American armies fought in the vicinity in 1776. In an effort to preserve this history, the Heritage trail was established marking many of the historic sites in White Plains and surrounding areas. The trail winds throughout the City, including within and through many of the census tracts that are designated as Justice 40 tracts. The trail runs through the brownfield site and is currently closed to the public due to the contamination. Cleaning up the PFAS will allow the trail to be restored as one continuous loop.

This projected reuse aligns with and advances the local government's land use and revitalization plans and related community priorities. The City is just completing the One White Plains Comprehensive Plan process that will provide policy guidance for future growth and development, housing, infrastructure and public services. The plan provides the foundation for decisions on development, zoning, capital spending, and general policy decisions. The name, One White Plains, punctuates the plan's commitment to the values of equity and inclusion. Six elements form the structure of the plan; one of these elements is playWP which focuses on enhancing the network of parks, supports recreational and cultural programming, and expands arts and entertainment options. Restoring the Heritage Trail is commensurate with several initiatives within the playWP element including:

- playWP2: "Build upon the Citywide system of interconnected open spaces to link parks and recreational resources with safe pedestrian and biking infrastructure."
- PlayWP3: "Advance park projects, acquisitions and investments that ensure equitable access to parks in all neighborhoods" with specific wording about the City's water supply lands that surround Reservoir Numbers One and Two and do not currently have public access.

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- PlayWP8: “Maximize park upgrades to connect people to nature and educate the community about ecological systems, plants, wildlife and wellness” with reference to improving the formal nature trails at the Water Supply Lands.
- PlayWP21 states “Continue to support the preservation of local landmarks and historic sites”

The public (including underserved communities) and project partners were involved in the development of the reuse strategy/projected reuse. Stakeholder engagement has been embedded into the One White Plains Comprehensive Plan process, a multi-year iterative campaign with numerous opportunities to refine and focus ideas. The strategy was informed by feedback received at numerous public meetings, community events and online outreach. A website and social media hosted a series of surveys in English and Spanish. A Listening Tour with Spanish, Haitian Creole, and English capabilities visited food distributions, the Farmers Market, the High School and other venues to ensure broad based involvement from often-unengaged communities. Ultimately, over 4,500 comments were received. Over 150 people attended a June 2023 public meeting where participants voted with color coded dots to indicate which ideas resonated. Following the public meeting, the initiative displays remained in the White Plains public library gallery for additional feedback. The initiatives outlined above received enthusiastic public support.

ii. Outcomes and Benefits of Reuse Strategy

The project will **stimulate economic development** by creating jobs that for local workers to help with the cleanup activities. In seeking contractors for sub awards, the City encourages applicant companies to support free and fair choice to join a union, have strong labor standards and promote equitable pathways into good jobs. Affirmative efforts are made to attract bids from minority, women, and veteran owned businesses.

In seeking a contractor for the remediation phase, the City will specify that they must prioritize hiring and training workers from the local community, especially workers who live in neighborhoods that have experience disproportionate adverse impacts. Workers will earn the prevailing wage, be given predictable and stable work schedules and fringe benefits commensurate as practicable. The training and work experience that these employees will gain as part of this grant funded project will advance economic development beyond the life of the grant funding. In addition, the reuse potential of the site will bring visitors to the White Plains area, further boosting the local economy.

Upon completion of the cleanup of the proposed site, the grant will facilitate the preservation of, and addition to, a trail that can be used by the public and for nonprofit purposes in the target area. The trail project is the completion and restoration of the historic Heritage Trail that winds through and connects the target property with other communities and neighborhoods within the City. Once established, the completed Heritage Trail will be used by numerous non-profits such as the Boy Scouts/Girl Scouts, the White Plains Youth Bureau, and El Centro Hispano. The White Plains Public School District will also use the trail as an “outdoor classroom” for their students. The long-term plan for the area is to establish a nature center at the site that will feature native plants and animals and foster a love for the natural environment in visitors young and old.

The proposed project will consider climate adaptation/mitigation capacity and resilience throughout the assessment, cleanup and redevelopment process. The cleanup process includes the removal of impervious surfaces to facilitate the excavation of contaminated soil. Replacement of these impervious surfaces with vegetation advances climate adaptation and mitigation by reducing the heat island effect, improving water infiltration, enhancing biodiversity and improving air quality.

Climate change brings with it the threat of severe weather and this clean-up project seeks to mitigate against impacts of severe weather, especially for historically disadvantaged communities. Once the cleanup is complete it will strengthen access to a backup drinking water supply, mitigating against

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potential disastrous weather events that preclude use of the current water supplies. The City will continue to assess the possibility of using the proposed site to facilitate renewable energy from wind, solar, or geothermal energy.

c. Strategy for Leveraging Resources

Resources Needed for Site Characterization, Remediation, and Reuse

Name of Resource	Is the Resource for (1.c.i) Assessment (1.c.ii) Remediation (1.c.iii) Reuse Activities	Is the Resource Secured or Unsecured?	Additional Details or Information about the Resource
In-kind work - DPW	Assessment/Site Characterization	Secured	The City's Department of Public Works (DPW) has invested significant staff time and expertise in assessing the site.
City General Funds	Assessment/Site Characterization	Secured	The City has already allocated \$537,667 for an Engineering consultant for site characterization. Outputs include SCWP, CPP, SCR, RI, IRM Workplan, RAWP, RIR, FS, IRMWP, RAWP, FWIA.
In-kind work - DPW	Remediation	Secured	DPW staff time will be instrumental in remediation tasks.
City of White Plains Capital funds	Remediation	In the City's Capital Improvements Plan – Water Fund	The estimated cost of the full consultant's fees for site characterization exceeds the requesting funding. The additional costs, anticipated at \$1,013,610 will be paid out of the City's capital funds.
In-kind work - DPW	Reuse Activities	Secured	All reuse supplies and labor will be supplied by DPW

iv. Use of Existing Infrastructure

The infrastructure required for site characterization and remediation will be provided by consultants and their sub-contractors. The City's Department of Public Works will use existing infrastructure for the reuse activities.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

The City of White Plains has conducted extensive community outreach over the past three years as part of the creation of a new Comprehensive Plan. Planning Department staff conducted an unprecedented campaign to ensure full equitable and inclusive community participation. English, Spanish, and Haitian Creole speaking staff attended food distributions, school events, and cultural

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celebrations, proactively inviting participants to share their comments. Online participation was encouraged through a website and social media. Outreach events were held in partnership with trusted community agencies that serve historically disproportionately impacted groups such as newly arrived Americans. Accommodations were offered to participants with mobility or other challenges.

As the result of this affirmatively welcoming process, the City curated a priority ranking of community needs. The proposed project addresses many of these top priorities. Top on the list of needs identified is more abundant and accessible green spaces for passive recreation to strengthen physical and emotional wellness, enhance a sense of community and address climate mitigation and adaptation concerns. Participants also enthusiastically endorsed the need for continued and sustained access to clean, healthy drinking water.

Emerging from the COVID pandemic, and faced with numerous competing priorities, the City is challenged to fund the full freight of the environmental remediation and subsequent reuse in the target area. 8.4% of White Plains residents live in poverty. However, poverty rates do not tell the full story. The cost of living in White Plains is exceedingly high. The Asset-Limited, Income-Constrained, Employed (ALICE) project is a dataset developed by United Way to identify households that do not fit the official definition of poverty, but still struggle to make ends meet financially. “ALICE Households” are defined as households that earn an annual income above the federal poverty threshold, but do not earn enough to meet basic minimum living costs (United Way). In White Plains 42% of households meet these criteria.

The City of White Plains is proactive in addressing the needs of vulnerable populations. During the pandemic, the City embraced a leadership role coordinating food security efforts to ensure that food was available at dates, times, and locations and quantities to meet the needs of the entire population. The City is an acknowledged regional leader in advancing housing availability. White Plains was only one of three municipalities in the region that provided lodging for asylum seekers in the summer of 2023. The Mayor was recently elected to serve on the Climate Mayors Steering Committee, a testament to the City’s commitment to addressing climate change and environmental justice issues. Each of these efforts reflect the City’s values and they come with very real costs. Funding through grant opportunities, such as this one, ensure that the City has the resources to respond to competing essential priorities without increasing water rates that could disproportionately burden already vulnerable communities.

ii. Threats to Sensitive Populations

The City of White Plains includes census tracts identified on the CEJST tool that meet the criteria for disadvantaged. Burdens noted in these census tracts are: lack of green space, traffic proximity and volume, linguistic isolation, low income and unemployment. Other target census tracts are highlighted on the EPA Environmental Justice and Screening Mapping Tool (EJScreen) for having elevated ozone levels which can be mitigated with tree plantings as trees absorb carbon dioxide helping to reduce the concentration of greenhouse gases in the atmosphere thereby protect the ozone layer. Together, this means that about 20% of the City’s population is adversely and disproportionately affected by environmental or human health harms and risks.

The table below illustrates the census tract and block groups designated as disadvantaged and includes the percent of low/moderate income level (LMI) residents as well.

Census tract/ Block group	Eligibility Designation	% LMI
88.01	EPA Environmental Justice and Screening Mapping Tool (EJScreen)	47.4
89.02	EPA Environmental Justice and Screening Mapping Tool (EJScreen)	46.6
90	EPA Environmental Justice and Screening Mapping Tool (EJScreen)	54.3
91.01	EPA Environmental Justice and Screening Mapping Tool (EJScreen)	49.1
91.03	EPA Environmental Justice and Screening Mapping Tool (EJScreen)	70.2

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92.01	Climate Economic Justice Screening Tool Disadvantaged	63.4
92.02	Climate Economic Justice Screening Tool Disadvantaged	76.6
92.03	Climate Economic Justice Screening Tool Disadvantaged	63.0
93	Climate Economic Justice Screening Tool Disadvantaged	65.2
94	Climate Economic Justice Screening Tool Disadvantaged	67.0

The proposed project site is within three miles from each of these disadvantaged neighborhoods and the proposed project benefits will accrue to residents of these areas. The greenspace will be publicly accessible at no cost to visitors. City departments and private agencies who serve residents of disadvantaged neighborhoods will be able to use this new resource as a place of passive recreation for their participants. The more secure availability of clean water that will be facilitated following the clean up will benefit these residents as well as one of the disproportionate health risks in disadvantaged communities is uncertain access to drinking water. By removing the contaminants from the soil, the City can prevent further leaching of the PFAS into the water and thereby safeguard the health of all residents.

(1) Health or Welfare of Sensitive Populations

Under CERCLA, the following populations are considered sensitive:

- Children: Children are often considered a sensitive population because they may be more susceptible to the harmful effects of hazardous substances due to their developing bodies and immune systems. 5.2% of the population (3,084 people) is below the age of 5 and 18.3% of the population (10,854) is below the age of 18.
- Pregnant Women: Pregnant women are another group often considered sensitive due to the potential risks posed to the developing fetus. The birth rate in White Plains is 4%.
- Elderly Individuals: Older adults may have weakened immune systems or preexisting health conditions that make them more susceptible to the effects of hazardous substances. 18.8% of the target population is over the age of 65 (11,151 people). White Plains has a higher proportion of people over age 65 as compared to the New York State population as a whole.
- Immunocompromised Individuals: People with compromised immune systems, such as individuals with HIV/AIDS or cancer patients undergoing chemotherapy, may be more vulnerable to the health risks associated with exposure to hazardous substances.
- Low-Income or Disadvantaged Communities: Socioeconomic status can play a significant role in determining exposure to hazardous substances. 20% of the City's population are living in disadvantaged communities.
- Minority and Indigenous Communities: Racial and ethnic minority communities, as well as Indigenous communities, have historically been disproportionately impacted by environmental hazards. They are considered sensitive populations due to the increased risk of exposure and associated health disparities. Only 46% of the City's population identifies as being "White, alone", compared to a state average of 56%. All other residents identify with some minority or indigenous community. 30% of the population is foreign born. White Plains has a higher percentage of people residents who identify as Hispanic (33%) as compared to New York State as a whole (19%)
- Individuals with Preexisting Health Conditions and Immunocompromised Individuals: People with preexisting medical conditions and people with compromised immune systems may be more susceptible to the health effects of exposure to hazardous substances. According to the New York State Department of Health, White Plains has a greater prevalence of newly diagnosed HIV cases when compared to the County rate. (13.4 vs. 10.3 cases per 100,000)

This grant and reuse strategy/projected site reuse(s) will address these issues by reducing barriers to clean and safe drinking water thus minimizing risks to vulnerable populations. In addition, by providing

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greater access to green space and the health benefits related to greenspace, the project will facilitate the reduction of threats to the health or welfare of such groups.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

The brownfield site has been securely closed to the public so as to avoid any exposure and related disease or other adverse health conditions. However, this closure comes at a cost. The community misses out on access to a beautiful and historic trail. Fire training activities have been moved to a site outside of the City, increasing costs and decreasing access. In addition, eliminating PFAS from the water source will support the City’s plan to build redundancy into the drinking water system through treating in-city water resources.

(3) Environmental Justice

(a) Identification of Environmental Justice Issues

According to the US Environmental Protection Agency, environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. This goal will be achieved when everyone enjoys: The same degree of protection from environmental and health hazards, and Equal access to the decision-making process to have a healthy environment in which to live, learn, and work. This project addresses two key environmental justice principles:

- **Distributional Justice:** equitable exposure to environmental harm. By facilitating the availability of clean drinking water to all of White Plains this grant promotes distributional justice.
- **Procedural Justice** – equitable access to the decision-making process. Every step of the way the City has, and will continue solicit input from vulnerable populations into the planning and implementation of this project.

While the brownfield site itself is not within a disadvantaged census tract according to CJEST, the clean-up plan and reuse strategy outlined in this application will benefit three census tracts that are identified as CJEST communities. Removing barriers to clean drinking water equitably benefits these areas.

(b) Advancing Environmental Justice

This grant and reuse strategy advance environmental justice by improving access to clean drinking water and a healthy outdoor recreation sites that is free from contamination. There will be no displacement of residents and/or businesses in the underserved communities.

b. Community Engagement

i and ii Project Involvement and Project Roles

Name of organization/entity/group	Point of Contact	Specific involvement in the project or assistance provided
El Centro Hispano	Executive Director	Outreach to Spanish speaking community
Slater Center	Executive Director	Outreach to Haitian Creole speaking community
White Plains Youth Bureau	Executive Director	Outreach to youth
White Plains Recreation and Parks Department	Commissioner	Planning for trail
White Plains Historical Society	President	Trail planning and linkages

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Community Residents	All	Input into Planning process
Ministerial Alliance	Chairperson	Outreach to historically black churches
Mayor’s Committee for People with Disabilities	Chairperson	Outreach to people with disabilities
White Plains Senior Center	President	Outreach to seniors
Alpha Kappa Alpha Society	President	Outreach to African American Women
Sustainable White Plains Committee	Chairperson	Focus on environmental justice
Las Hermanas	President	Outreach to Latina women
Lifting Up Westchester	Jobs Central Director	Employment training and coaching
Comprehensive Plan Implementation Committee	Members	Ensure alignment with Comprehensive Plan

iii Incorporating Community Input

The City’s robust community engagement networks that were employed during the Comprehensive Plan process will be duplicated here to ensure the same level of outreach into the underserved communities and groups directly impacted by the work. Outreach efforts will include: a website updated weekly and available 24/7; social media posts in English and Spanish that are posted at least weekly; monthly meetings with stakeholders that include an on-line and in-person option; at least one large scale community meeting in English and one in Spanish at a centrally located accessible location. Input will be solicited through each of these venues, considered thoughtfully by the implementation team, and responded to personally where appropriate and publicly where appropriate.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

The proposed cleanup plan includes an NYSDEC- approved Interim Remedial Measure (IRM) to address the soil source areas at the FDDS property, and the surface water discharge from the FDDS property into the reservoir. With a thin lens of overburden over bedrock (averaging 4-6 feet below grade depth to bedrock) the soil source area will likely be addressed by excavation, with steam injection or carbon mixing a possibility for certain peripheral areas of the source location. Carbon filtration is anticipated to be applied as part of the IRM to the intermittent stream in the form of a filter and treatment mechanism (i.e., permeable reactive barrier, funnel and gate, or equivalent). The IRM is anticipated to address the source of contamination and provide direct treatment to the water that discharges into the reservoir. The IRM will allow for an expedited treatment strategy for the source area while the full site remedy goes through the full NYSDEC-required feasibility and selection process.

b. Description of Tasks/Activities and Outputs

Task/Activity: Excavation or Remediation of Hot Spots
i. Project Implementation
<ul style="list-style-type: none"> • EPA-funded tasks/activities: Includes preparation of IRM work plan, NYSDEC approval and oversight, excavation, backfill, disposal, health and safety, and general conditions. Initiation of IRM • Non-EPA grant resources needed to carry out tasks/activity, if applicable: DPW staff time
ii. Anticipated Project Schedule: Estimated to start June 2024 and be completed by December 2024

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iii. Task/Activity Lead: DPW
iv. Outputs: IRM workplan, daily and monthly reports
Task/Activity: In-situ Groundwater Treatment - Source Area
i. Project Implementation <ul style="list-style-type: none"> EPA-funded tasks/activities: Carbon filtration is anticipated to be applied as part of the IRM to the intermittent stream in the form of a filter and treatment mechanism (i.e., permeable reactive barrier, funnel and gate, or equivalent). The IRM is anticipated to address the source of contamination and provide direct treatment to the water that discharges into the reservoir. Non-EPA grant resources needed to carry out tasks/activity, if applicable: DPW staff time
ii. Anticipated Project Schedule: Estimated to start June 2024 and be completed by December 2024
iii. Task/Activity Lead: DPW
iv. Outputs: Lab reports
Task/Activity: Stream Remediation and Treatment
i. Project Implementation <ul style="list-style-type: none"> EPA-funded tasks/activities: Carbon filtration is anticipated to be applied as part of the IRM to the intermittent stream in the form of a filter and treatment mechanism (i.e., permeable reactive barrier, funnel and gate, or equivalent). The IRM is anticipated to address the source of contamination and provide direct treatment to the water that discharges into the reservoir. Non-EPA grant resources needed to carry out tasks/activity, if applicable: DPW staff time
ii. Anticipated Project Schedule: Estimated to start June 2024 and be completed by December 2024
iii. Task/Activity Lead: DPW
iv. Outputs: Lab reports
Task/Activity: Engineering
i. Project Implementation <ul style="list-style-type: none"> EPA-funded tasks/activities: Remediation design work Non-EPA grant resources needed to carry out tasks/activity, if applicable: DPW staff time
ii. Anticipated Project Schedule: Estimated to start June 2024 and be completed by December 2024
iii. Task/Activity Lead: Engineering Contractor
iv. Outputs: Engineering reports
Task/Activity: Restore Heritage Trail Walking Path
i. Project Implementation <ul style="list-style-type: none"> EPA-funded tasks/activities: None Non-EPA grant resources needed to carry out tasks/activity, if applicable: DPW staff time
ii. Anticipated Project Schedule:
iii. Task/Activity Lead: DPW
iv. Outputs: Drawings of plan for trail, work logs, pictures of trail completion
Task/Activity: Community Participation
i. Project Implementation <ul style="list-style-type: none"> EPA-funded tasks/activities: None Non-EPA grant resources needed to carry out tasks/activity, if applicable: Community meetings, stakeholder outreach, web and social media postings
ii. Anticipated Project Schedule: Ongoing throughout the entire project period
iii. Task/Activity Lead: City of White Plains Planning Department
iv. Outputs: Citizen Participation Plan; Meeting flyers, agendas and minutes; social media metrics

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City of White Plains FY24 Brownfields Cleanup Grant
Narrative/Ranking Criteria

Threshold Criteria for Clean Up Grants

1. Applicant Eligibility: We affirm that the City of White Plains is eligible as a General Purpose Unit of Local Government.

2. Previously Awarded Cleanup Grants: We affirm that we have not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds: We affirm that we do not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership: The City of White Plains is the current owner of the site.

5. Basic Site Information:

- a) Name of the site: Former White Plains Fire Department Drill School (FDDS)
- b) Address of the site: 1402 Old Orchard Street, White Plains, New York 10604

6. Status and History of Contamination at the Site

- a) This site is contaminated by PFAs.
- b) Operational History and Current Use: The Site is owned by the City of White Plains (the City) and is located at 1402 Old Orchard Street, White Plains, New York. The Site is 141 acres, mainly wooded with small streams, and the FDDS is situated within a 4-acre clearing that is located approximately 500 feet east of White Plains Reservoir No. 2. The Orchard Street Pumping Station (OSPS) property and its facilities, also owned and operated by The City, are located within the western portion of the Site, and south-adjacent to Reservoir No. 2. The low-lying wetland area west-adjacent to the OSPS and southwest-adjacent to Reservoir No. 2 is also located within the western portion of the Site. The legal definition of the Site is City of White Plains Tax ID 120.20- 17-1, and the property class is identified as Public Services-Water Supply. Although indicated as separate lots, these lots are included under the same Tax ID number.
- c) Environmental Concerns: City's primary water supply [purchased from New York City (NYC) water supply system], the City began to explore the option of a upgrading and putting the OSPS back online to serve as a secondary supply source to the purchased NYC water. As part of the project, water quality sampling was initiated as part of the New York State Department of Environmental Conservation (NYSDEC) permitting process for public water supply systems. The NYSDEC requirements included sampling for additional parameters on the Unregulated Contaminant Monitoring Rule . Samples collected from Reservoirs 1 and 2 in September 2018 showed detections of per- and polyfluoralkyl substances (PFAS). The laboratory results indicated that additional investigation was needed to address the presence of the PFAS compounds.

Between April and July 2019, The City voluntarily conducted two additional phases of investigation in an effort to determine the source of the PFAS in the reservoirs and groundwater at the OSPS site. The investigation included the collection of groundwater and surface water samples from the OSPS site and the surrounding Reservoir #2 and FDDS property. The results of the investigation indicated that the FDDS was a potential source for the PFAS contamination.

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d) How the Site became Contaminated and the Nature and Extent of the Contamination: The fire department training center has been in operation at the Site since approximately 1960 (the first permit for the fire training center was recorded on August 22, 2955). Prior to 1960, the Site was used by the police department for training exercises. Fire department training included live fire training in several different scenarios. The burn building on the eastern side of the clearing allows for multi-floor, realistic live fire training in a scenario where heat and smoke-filled rooms can be controlled for safety. Small training fires using vehicles, pallets, and furniture were also utilized to understand and anticipate the burn tendencies for many real fire response situations. The City reported that historical aqueous film-forming foam (AFFF) usage by the fire department, as summarized below:

- Mid-1960s to mid-1970s: 3M AFFF
- Mid-1970s to 1998: 3M AFFF&ATC
- 1998 to June 2014: Angus AR-FFFP
- June 2014 to present: National Universal Gold AR-AFFF

It should be noted that training with AFFF, or any other type of foam products for fire suppression, was discontinued at the FDDS in early 2020.

AFFF was reported to be used sparingly during the training scenarios, due to the cost of using foam versus water, but it was used on occasion. Near empty barrels of foam and residual foam left in a pump truck after live fire response were reported to be cleaned out and discharged to the ground near the hydrant location on the Site, which is north adjacent to the access road and west adjacent to the stream that runs below the FDDS access driveway at the Site.

Two phases of Site Characterization Investigation (SCI), and one phase of Remedial Investigation (RI) were completed at the Site in accordance with NYSDEC-approved work plans. Two soil source areas were documented at the Site. The first included the direct discharge of fire suppression foam during firefighter training to the asphalt surface west of the burn building. The second included discharge of residual foam adjacent to the fire hydrant that is located east-adjacent to the Site access driveway. The rinsed material was reported to be discharged directly to the ground.

The conceptual site model includes fire suppression foam being applied at the asphalt area, entering the cracks in the asphalt and contacting the underlying soil and groundwater, and then flowing downgradient in groundwater to the stream below/perpendicular to the access driveway. The foam would also flow on the asphalt surface downgradient to the same location, which is also the foam drum cleanout area next to the fire hydrant along the access driveway. At this point, both source areas converge, and flow in the intermittent stream approximately 450 feet on exposed bedrock, or a thin layer of silt over bedrock, to East Pond. Surface water from East Pond flows through two large diameter pipes directly into Reservoir #2, and overflow from Reservoir #2 discharges into the low-lying wetland west-adjacent to the OSPS.

With the investigation phases wrapping up, the next steps are to move to the remedy phase, which is anticipated to include an Interim Remedial Measures Work Plan (IRMWP) to address the soil source area(s) while the full site remedy [Remedial Action Work Plan (RAWP)] is being prepared. With this approach, it's anticipated that the IRM work would be completed in 2024, and the full site remedy would be initiated by 2025. Each phase of the investigation and remediation is being conducted under oversight by the NYSDEC.

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7. Brownfield Site Definition: The investigation and remediation work at the FDDS is being completed under oversight of the NYSDEC. Although entering the NYSDEC Brownfield Cleanup Program (BCP) was considered, a decision was made to voluntarily complete the work under an order on Consent with the State to expedite the process and go straight into investigation. Entry into the BCP would have avoided the administrative order with the state, but being a municipality, doing the work under an order was preferred from the City's perspective to take a more stringent approach to remediation, provide to most transparency to the public, and engage in the quickest timeline to completion.

8. Environmental Assessment Required for Cleanup Grant Applications:

1) Site Characterization Report (SCR) – White Plains Fire Department Drill School, 1402 Old Orchard Street, White Plains, New York, AKRF, Inc., April 2022

2) Draft Remedial Investigation Report (RIR) - White Plains Fire Department Drill School, 1402 Old Orchard Street, White Plains, New York, AKRF, Inc., November 2023

The SCR included: the advancement of 19 soil borings with continuous soil sampling, the installation of six overburden monitoring wells, and the collection of 35 soil samples, 12 co-located stream sediment and surface water samples, one isolated surface water sample, and 14 groundwater samples (from the cistern wells, dam piezometers, and newly installed overburden monitoring wells) for laboratory analysis.

The RIR included: advancement of 14 soil borings, the installation of four new monitoring wells (two overburden wells and two bedrock wells), and the collection of 41 soil samples, 8 co-located stream sediment and surface water samples, and the collection of 18 groundwater samples.

Both the Site Characterization and Remedial Investigations were conducted in accordance with an NYSDEC-approved work plan, which included conformance with the prevailing state and federal regulations for investigation and site characterization. The SCR has been approved by NYSDEC; the draft RIR is currently under review

9. A statement affirming that there is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site(s):

The draft RIR provides delineation data to understand the nature and extent of the PFAS release area, the affected environmental media, and includes a recommendation to NYSDEC to move forward with Interim Remedial Measures (IRMs) and a site-wide remedy.

10. Enforcement or Other Actions: The investigation and anticipated remediation work has been conducted in accordance with an Administrative Order on Consent with NYSDEC (DEC Site No. 360193). All investigation and remediation work has been or will be completed in accordance with and approval with NYSDEC regulatory/cleanup guidelines and criteria.

11. Sites Requiring a Property Specific Determination: The City of White Plains has requested a Property Specific Determination and we are awaiting receipt of that determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

- The property is publicly owned and acquired prior to January 11, 2002.
- The City was unknowingly responsible for the PFAS release at the site during the fire suppression training programs completed to maximize the City's public safety capabilities

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- Due to proprietary protections offered to corporate producers of AFFF, the advertisement of AFFF being a safe application for fire protection, and the regulatory environment where clean up requirements, enforcement, and guidance values have only been, and are still being promulgated, the City was not aware of, or did not knowingly take part in any transport to or disposal of hazardous substances at the Site.

13. Cleanup Authority and Oversight Structure

- a. The investigation and remediation work at the FDDS is being completed under oversight of the NYSDEC. Although entering the NYSDEC Brownfield Cleanup Program (BCP) was considered, a decision was made to voluntarily complete the work under an order on Consent with the State to expedite the process and go straight into investigation. Entry into the BCP would have avoided the administrative order with the state, but being a municipality, doing the work under an order was preferred from the City's perspective to take a more stringent approach to remediation, provide to most transparency to the public, and engage in the quickest timeline to completion.
- b. No adjacent properties are impacted.

14. Community Notification

- a. The Draft Analysis of Brownfield Cleanup Alternatives as posted publicly on the City of White Plains website on Monday October 30, 2023.
- b. The City of White Plains Published a community notification as in the local paper on October 30 2023.
- c. On October 13, 2023, the City held a public meeting to discuss the draft applications and consider public comments.
- d. The required Community Notification Documents are attached
 - Draft ABCA
 - Copy of the newspaper ad
 - Summary of comments and applicant's response
 - Meeting notes
 - Meeting sign in list

15. Contractors and Named Subrecipients

Not Applicable