Short Environmental Assessment Form
Part 1 - Project Information

Instructions for Completing

Part 1 - Project Information. The applicant or project sponsor is responsible for the completion of Part 1. Responses become part of the application for approval or funding, are subject to public review, and may be subject to further verification. Complete Part 1 based on information currently available. If additional research or investigation would be needed to fully respond to any item, please answer as thoroughly as possible based on current information.

Complete all items in Part 1. You may also provide any additional information which you believe will be needed by or useful to the lead agency; attach additional pages as necessary to supplement any item.

Part 1 - Project and Sponsor Information

Project: Building 52 Demolition; Sponsor: ARCO Environmental Remediation, LLC. (AERL), see attached narrative for ownership details.

Name of Action or Project:
Demolition of Building 52

Project Location (describe, and attach a location map):
1 River Street, Hastings on Hudson, NY

Brief Description of Proposed Action:
Demolish Building 52. See attached narrative.

Name of Applicant or Sponsor:	Telephone: 832-664-2372
AERL	E-Mail: nick.peterson@bp.com

Address:
201 Helios Way, HPL, 6th Floor

City/PO:	State:	Zip Code:
Houston	TX	77079

	NO	YES
1. Does the proposed action only involve the legislative adoption of a plan, local law, ordinance, administrative rule, or regulation? If Yes, attach a narrative description of the intent of the proposed action and the environmental resources that may be affected in the municipality and proceed to Part 2. If no, continue to question 2.	☑	☐
2. Does the proposed action require a permit, approval or funding from any other governmental Agency? If Yes, list agency(s) name and permit or approval: Demolition of Building 52 will require a building permit issued by the Village of Hastings-on-Hudson; in addition, a 30 day notification will be submitted to the EPA (761.61(a))	☐	☑

3.a. Total acreage of the site of the proposed action? 2.2 acres
b. Total acreage to be physically disturbed? N/A acres
c. Total acreage (project site and any contiguous properties) owned or controlled by the applicant or project sponsor? 28 acres

4. Check all land uses that occur on, adjoining and near the proposed action.
☑ Urban ☐ Rural (non-agriculture) ☐ Industrial ☑ Commercial ☐ Residential (suburban)
☐ Forest ☐ Agriculture ☑ Aquatic ☑ Other (specify): Transportation (railroad)
☐ Parkland

	NO	YES	N/A
5. Is the proposed action, a. A permitted use under the zoning regulations?	☐	☑	☐
b. Consistent with the adopted comprehensive plan?	☐	☑	☐
6. Is the proposed action consistent with the predominant character of the existing built or natural landscape?	NO	YES	
	☐	☑	
7. Is the site of the proposed action located in, or does it adjoin, a state listed Critical Environmental Area?	NO	YES	
If Yes, identify: Name: Hudson River, Reason: Exceptional or unique character, Agency: Westchester County, Date: 1-31-90.	☐	☑	
8. a. Will the proposed action result in a substantial increase in traffic above present levels?	NO	YES	
	☑	☐	
b. Are public transportation service(s) available at or near the site of the proposed action?	☐	☑	
c. Are any pedestrian accommodations or bicycle routes available on or near site of the proposed action?	☐	☑	
9. Does the proposed action meet or exceed the state energy code requirements?	NO	YES	
If the proposed action will exceed requirements, describe design features and technologies:	☐	☑	
10. Will the proposed action connect to an existing public/private water supply?	NO	YES	
If No, describe method for providing potable water: Vendor (Poland Springs)	☑	☐	
11. Will the proposed action connect to existing wastewater utilities?	NO	YES	
If No, describe method for providing wastewater treatment: Portable restrooms	☑	☐	
12. a. Does the site contain a structure that is listed on either the State or National Register of Historic Places?	NO	YES	
	☑	☐	
b. Is the proposed action located in an archeological sensitive area?	☑	☐	
13. a. Does any portion of the site of the proposed action, or lands adjoining the proposed action, contain wetlands or other waterbodies regulated by a federal, state or local agency?	NO	YES	
	☐	☑	
b. Would the proposed action physically alter, or encroach into, any existing wetland or waterbody?	☑	☐	
If Yes, identify the wetland or waterbody and extent of alterations in square feet or acres:			

14. Identify the typical habitat types that occur on, or are likely to be found on the project site. Check all that apply:

☐ Shoreline ☐ Forest ☐ Agricultural/grasslands ☐ Early mid-successional
☐ Wetland ☑ Urban ☐ Suburban

	NO	YES
15. Does the site of the proposed action contain any species of animal, or associated habitats, listed by the State or Federal government as threatened or endangered?	☑	☐
16. Is the project site located in the 100 year flood plain?	☐	☑
17. Will the proposed action create storm water discharge, either from point or non-point sources?	NO	YES
If Yes, a. Will storm water discharges flow to adjacent properties? ☐ NO ☐ YES	☑	☐
b. Will storm water discharges be directed to established conveyance systems (runoff and storm drains)?		
If Yes, briefly describe: ☐ NO ☐ YES		

	NO	YES
18. Does the proposed action include construction or other activities that result in the impoundment of water or other liquids (e.g. retention pond, waste lagoon, dam)? If Yes, explain purpose and size:	☑	☐
19. Has the site of the proposed action or an adjoining property been the location of an active or closed solid waste management facility? If Yes, describe: Former Building 15, now demolished, was located south of Building 52 and served as a waste transfer station in the 1980's (prior to acquisition by AERL).	☐	☑
20. Has the site of the proposed action or an adjoining property been the subject of remediation (ongoing or completed) for hazardous waste? If Yes, describe: See attached narrative.	☐	☑

I AFFIRM THAT THE INFORMATION PROVIDED ABOVE IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE

Applicant/sponsor name: Nick Peterson Date: January 6, 2016

Signature:

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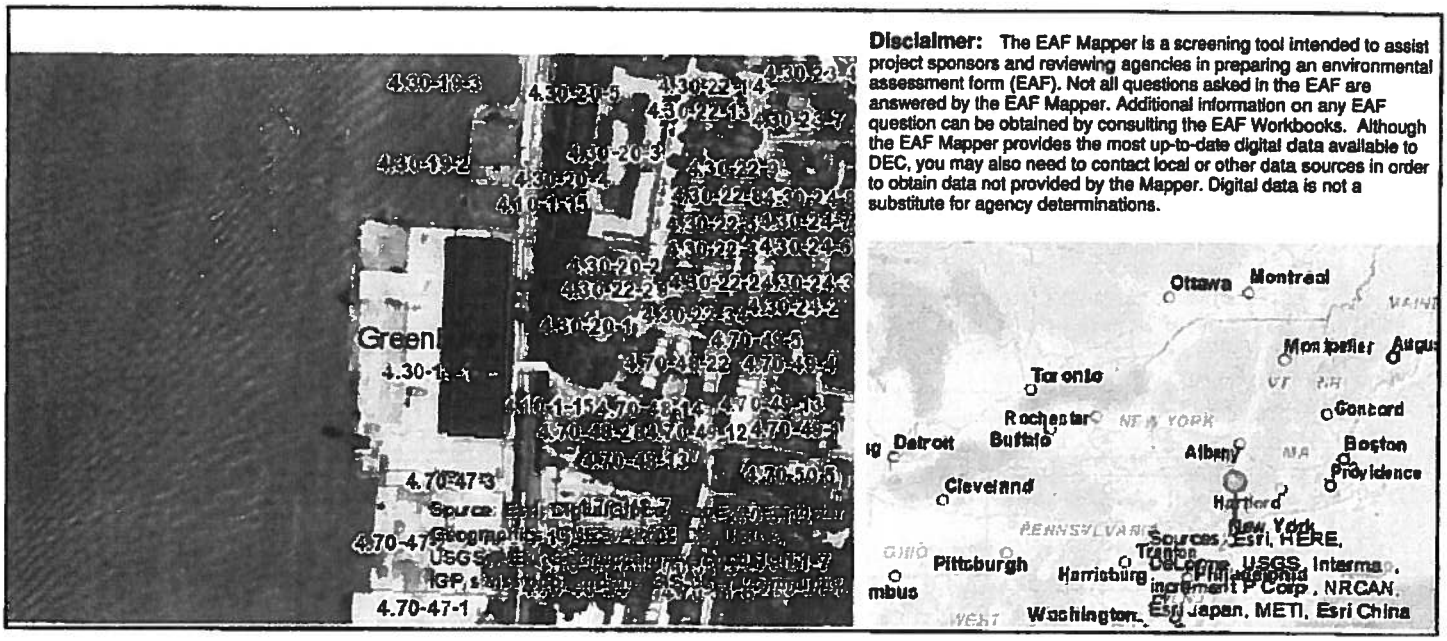
EAF Mapper Summary Report

Saturday, December 26, 2015 9:56 PM



Part 1 / Question 7 [Critical Environmental Area]	Yes
Part 1 / Question 7 [Critical Environmental Area - Identify]	Name:Hudson River, Reason:Exceptional or unique character, Agency:Westchester County, Date:1-31-90
Part 1 / Question 12a [National Register of Historic Places]	No
Part 1 / Question 12b [Archeological Sites]	No
Part 1 / Question 13a [Wetlands or Other Regulated Waterbodies]	Yes - Digital mapping information on local and federal wetlands and waterbodies is known to be incomplete. Refer to EAF Workbook.
Part 1 / Question 15 [Threatened or Endangered Animal]	Yes *
Part 1 / Question 16 [100 Year Flood Plain]	Yes
Part 1 / Question 20 [Remediation Site]	Yes

* The NYS database, which contains information regarding threatened or endangered species, indicated that endangered or threatened flowering plants were last observed in the area in 1898 (based on a search conducted on 1/5/2016). The IPaC database (federal) did not indicate the presence of threatened or endangered species (accessed on 1/5/2016) at the site of proposed action. The site of proposed action (Building 52) is developed and does not contain natural habitat for listed rare, threatened or endangered species.

Agency Use Only [If applicable]

Project:

Date:

Short Environmental Assessment Form
Part 2 - Impact Assessment

Part 2 is to be completed by the Lead Agency.
Answer all of the following questions in Part 2 using the information contained in Part 1 and other materials submitted by the project sponsor or otherwise available to the reviewer. When answering the questions the reviewer should be guided by the concept "Have my responses been reasonable considering the scale and context of the proposed action?"

	No, or small impact may occur	Moderate to large impact may occur
1. Will the proposed action create a material conflict with an adopted land use plan or zoning regulations?	☑	☐
2. Will the proposed action result in a change in the use or intensity of use of land?	☑	☐
3. Will the proposed action impair the character or quality of the existing community?	☑	☐
4. Will the proposed action have an impact on the environmental characteristics that caused the establishment of a Critical Environmental Area (CEA)?	☑	☐
5. Will the proposed action result in an adverse change in the existing level of traffic or affect existing infrastructure for mass transit, biking or walkway?	☑	☐
6. Will the proposed action cause an increase in the use of energy and it fails to incorporate reasonably available energy conservation or renewable energy opportunities?	☑	☐
7. Will the proposed action impact existing: a. public / private water supplies?	☑	☐
b. public / private wastewater treatment utilities?	☑	☐
8. Will the proposed action impair the character or quality of important historic, archaeological, architectural or aesthetic resources?	☐	☑
9. Will the proposed action result in an adverse change to natural resources (e.g., wetlands, waterbodies, groundwater, air quality, flora and fauna)?	☑	☐
10. Will the proposed action result in an increase in the potential for erosion, flooding or drainage problems?	☑	☐
11. Will the proposed action create a hazard to environmental resources or human health?	☐	☑

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Agency Use Only [If applicable]

Project:

Date:

Short Environmental Assessment Form
Part 3 Determination of Significance

For every question in Part 2 that was answered "moderate to large impact may occur", or if there is a need to explain why a particular element of the proposed action may or will not result in a significant adverse environmental impact, please complete Part 3. Part 3 should, in sufficient detail, identify the impact, including any measures or design elements that have been included by the project sponsor to avoid or reduce impacts. Part 3 should also explain how the lead agency determined that the impact may or will not be significant. Each potential impact should be assessed considering its setting, probability of occurring, duration, irreversibility, geographic scope and magnitude. Also consider the potential for short-term, long-term and cumulative impacts.

See Attached.

☐ Check this box if you have determined, based on the information and analysis above, and any supporting documentation, that the proposed action may result in one or more potentially large or significant adverse impacts and an environmental impact statement is required.

☐ Check this box if you have determined, based on the information and analysis above, and any supporting documentation, that the proposed action will not result in any significant adverse environmental impacts.

Village of Hastings-on-Hudson Board of Trustees	November __, 2016
Name of Lead Agency	Date
Francis Frobel	Village Manager
Print or Type Name of Responsible Officer in Lead Agency	Title of Responsible Officer
Signature of Responsible Officer in Lead Agency	Signature of Preparer (if different from Responsible Officer)

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Part 3 Attachment

The Proposed Action involves the demolition of Building 52, which is the last remaining structure (other than the water tower) of the former Anaconda manufacturing facility on the approximately 28-acre property now owned by Remediation Management Services Company, an affiliate of the Atlantic Richfield Company (collectively, "ARC"). The demolition process (and resulting impacts as described below), which relates to only 2.2 acres of the property, is expected to take approximately six months.

The Application

As part of its application for a demolition permit, ARC submitted an Environmental Assessment Form ("EAF") and several reports and plans that detailed the process for the demolition and the steps taken to protect public health and safety. These submissions included the following:

- An Application for Building Permit
- A Short Environmental Assessment Form
- Correspondence and a Resource Evaluation from the New York State Office of Parks, Recreation and Historic Preservation
- A Building 52 Sampling and Analysis Work Plan ("SAP"), which describes the sampling of materials in and on the exterior of the building to determine the extent of PCBs, asbestos, and lead paint that would be classified as hazardous waste. The results of this sampling would dictate the appropriate measures for specific construction sequencing, environmental controls, segregation of the resulting waste material, and the proper disposal thereof.
- A Draft Community Air Monitoring Plan ("CAMP"), which provides for monitoring along the perimeter of the work area for particulate matter, PCBs, lead, and silica (sources of which include brick).
- Building 52 Demolition Waste Management Strategy Report ("DWMSR"), which describes the pre-demolition activities to characterize the extent and concentrations of PCBs and other hazardous materials in the building materials, the demolition of the building and floor joints, and proposed segregation and disposal of construction and demolition debris waste streams.
- A set of 13 "Decommissioning and Demolition of Building 52" design drawings ('bid sheets') to be provided to contractors bidding on the demolition project.
- ARC Memo dated June 20, 2016 summarizing the documents provided and the proposed demolition project elements and sequence of work.
- A demolition project schedule.

Collectively, these and other submissions include general plans for site environmental controls; decontamination; dust control; wastewater and stormwater collection, treatment, and disposal; contingencies; waste disposal; and community notification and complaint management. It should be noted that the General Notes design drawing (Sheet T-101)

indicates that, as is not atypical, the selected demolition contractor is to prepare a demolition work plan setting forth the means and methods for decontamination; dust control; wastewater and stormwater collection, treatment and control; contingency planning, hazardous materials and waste disposal planning, and the CAMP. The basic elements of a worker health and safety plan ("HASP"), which would later be used by the ARC contractor to prepare a site-specific HASP, were also provided in the June 20, 2016 memo.

Louis Berger U.S. ("Louis Berger"), the independent consultant for the Village, commented on certain of these various submissions, in particular the design drawings and memo, Draft CAMP, and DWMSR. The initial comments were provided to ARC by letter from the Village's special environmental counsel, Sive, Paget & Riesel, P.C. ("SPR") to ARC counsel, with an accompanying July 22, 2016 Memorandum prepared by Louis Berger.

ARC revised its submission in response to the July 22, 2016 Louis Berger Memorandum, and submitted additional information by letter of August 16, 2016. Louis Berger provided several recommendations with respect to ARC's August 16, 2016 submission in a September 6, 2016 Memorandum, which were provided to ARC counsel by SPR on September 7, 2016. By letter dated September 13, 2016, ARC concurred with the recommendations/clarifications of the September 6, 2016 Berger Memorandum and indicated same would be incorporated into their plans.

Part 3 Discussion

EAF Part 2, Item 11
Will the proposed action create a hazard to environmental resources or human health?

The principal environmental concern raised by the Proposed Action relates to the potential for the dispersion of particulate matter (dust) containing contaminants, especially PCBs, asbestos, silica, and lead paint. The SAP provides for sampling of building materials for these contaminants, which ARC undertook. Relevant building components were sampled, including floor slabs, masonry, walls, ceilings, interior steel, expansion joints, window caulking and glaze and roofing materials. The results of the sampling and the proposed demolition and disposal scenarios are contained in the DWMSR. This report details the various pre-demolition activities, including the planned installation of various environmental protection controls (e.g., truck decontamination area) and the pre-demolition monitoring of air quality to establish baseline (ambient) conditions for the CAMP (discussed below).

The CAMP would be operated during each phase of demolition activities, consistent with the recommendations of Louis Berger. For shorter term activities, the CAMP monitoring would operate continuously; for longer term activities, it would operate during the initial and representative periods. The CAMP would monitor for particulate matter in real time (i.e., instantaneous results). The CAMP's daily monitoring for PCBs and lead, as well as silica (a constituent of certain building materials), would yield results after laboratory analysis of air

samples (real time monitoring is not available for these substances); however, particulate matter is to be used by ARC as a surrogate for these contaminants, based on calculations derived from their pre-demolition sampling and characterization of the building materials.

Appropriate action levels for these constituents have been established that would protect the surrounding community such that, if exceeded, further steps must be taken to reduce the levels of the relevant contaminant and, if those actions are not successful in reducing the levels, the offending activity(ies) must be suspended until a solution is reached. Louis Berger reviewed these action levels and steps and provided recommendations to ARC, which were accepted in their September 13, 2016 letter and will be incorporated into the CAMP. The CAMP emission action levels are designed to protect the surrounding community; control of dust emissions from the demolition process will also mitigate potential environmental impacts (such as potential deposition in the Hudson River).

ARC would provide the CAMP monitoring information via a website available to the public. The particulate monitoring results would be available in real time; the results of the PCB, silica and lead monitoring would be available after there is quality assurance-quality control review of the laboratory analytical results from the air samples. In addition, the Village expects to have observers, from Louis Berger and/or the Village Building Department, on the site as needed.

Prior to the commencement of demolition, the ARC contractor would develop a site-specific HASP, which would contain emergency information, an emergency response plan, and emergency preparedness procedures.

The ARC submission lays out the basic demolition procedure, subsequent to the implementation of the CAMP. The steps include the removal of various materials and portions of the building, which would be collected, segregated into separate waste streams and managed, and disposed of in permitted off-site facilities. The principal demolition activities include the removal of universal waste, cleaning of sumps and pits in the building, removal of interior portions of the building slabs with elevated levels of PCBs, scraping of loose paint, and abatement of asbestos (per New York State Labor Law requirements). The building demolition sequence would involve the removal of the brick, then the ceiling and finally the steel structure, followed by the removal of floor expansion joints and then backfilling. Typical demolition equipment would be used, such as front end loaders, roll off containers, water storage containers (for dust control), and trucks.

ARC would erect a control barrier around the perimeter of the work area, where waste streams will be stockpiled, sampled and transported off site for disposal. Trucks exiting the site would go through a tire wash station. ARC would implement a dust control plan, which would include the wetting of debris, stockpiles, and transportation areas, and contingency measures should air monitoring action levels be triggered. Stormwater would be controlled by control barriers around the perimeter of the work area, and both the stormwater and wastewater would be collected and disposed offsite.

Construction and demolition debris would be transported off-site. There is no infrastructure at the site to allow for transportation offsite by barge at this time (however, the lack of current infrastructure for the limited demolition debris disposal would not necessarily be applicable as a reason to reject a barge transportation option for the large-scale excavation and backfilling that are part of the ultimate site remediation). The truck route would be Main Street to Maple Avenue to North Avenue to Route 9 north to Interstate 287. It is anticipated that the demolition would involve approximately 400 truckloads of debris over a two-to-three-month period. ARC's contractor would inspect the truck routes on a periodic basis to determine whether the operations have affected road conditions. Trucks would enter and exit the site only between the hours of 9 AM and 3 PM, to minimize potential impacts on commuter traffic patterns in the morning and school-related traffic in the afternoon. Final details for the truck routes and timing will be coordinated with the Village and the contractor, in accordance with the above.

There are no residences adjacent to the site, and noise from the demolition is not expected to be any greater than typical construction noise.

The U.S. Environmental Protection Agency ("EPA") submitted comments dated October 18, 2016 on the ARC application pursuant to its authority under the Toxic Substances Control Act, by which EPA has authority over certain aspects of the remediation of PCBs in Building 52 and on the site. EPA's comments request further characterization of the building materials, which will facilitate more precise identification and segregation of the waste streams for appropriate disposal. EPA has requested ARC to further investigate any former process drains, sumps, and/or dry wells beneath the Building 52 slab, even if they were welded shut or filled in with gravel, to investigate for residual PCBs that could potentially be mobilized once the building and slab is removed and the subsurface is exposed to precipitation and flooding that could potentially cause contaminant migration. These requested actions which will have to be complied with would further minimize potential adverse impacts.[1]

Finally, Louis Berger has confirmed, by a memorandum dated November 10, 2016, copy attached, that the conceptual approach to demolition, as set forth in the ARC application and accompanying submissions (as modified), addresses protection of public health and the environment during the demolition and material handling process that is in general conformance with regulatory requirements. The Village will request Louis Berger to review the selected Contractor's work plans and other submittals to confirm this conclusion.

EAF Part 2, Item 8
Will the proposed action impair the character or quality of important historic, archaeological,architectural or aesthetic resources?

During the extensive public process relating to the proposed demolition, members of the public commented that the demolition of the building would constitute the loss of an important

[1] The New York State Department of Environmental Conservation reviewed the ARC proposal for demolition of Building 52 but had no comments thereon.

historic resource, due to the building's association with the Anaconda operations at the site and the nexus to the Village's industrial history. However, the State Historic Preservation Office of the New York State Department of Parks, Historic Preservation and Recreation has found that the building is not eligible for listing on the State or Federal Register of Historic Places ("OPRHP"). While of some local importance, the demolition of the building is not considered to be a significant impact with regard to cultural resources.

OPRHP completed a Resource Evaluation to determine the property and in particular Building 52 does not meet eligibility requirements. Not only did OPRHP determine that Building 52 no longer retains the integrity of the setting in conjunction with other industrial buildings to make it eligible, but that the integrity of design and workmanship were both diminished to the point where the building is not eligible for listing. In particular, the removal of most lower windows and some upper windows, and the filling in of openings with masonry units have significantly altered a design element of an industrial building of the period. Doorway openings have also been modified, and even the sawtooth roof has been altered by the removal of one of the twelve monitors due to structural failure and removal of many of the character defining steel windows. The qualities of workmanship evident in the original building have deteriorated.

The Proposed Action would also not have an adverse impact on long-term planning for the waterfront, and could actually provide a benefit for the long-term planning. Demolition of this very large building would allow future development of the waterfront to be unconstrained by the continuing presence of the building and provide for more flexibility in design. The reuse of the building is not reasonably foreseeable. The Board has discussed the potential reuse of the building with experts in the development field, and was informed that reuse of the building is not reasonably anticipated. Although many commenters have urged reuse, no proposal has been forthcoming over the years of discussion regarding potential demolition.

Furthermore, retention of the building would mean that, absent reuse and after the waterfront is developed, the building would eventually need to be demolished and the contaminated soil under it excavated at a time when there may be nearby residential and other uses. The process would result in potentially significant adverse impacts to residents and visitors that would not occur with demolition on a vacant site. Moreover, absent reuse, the building would further deteriorate, which could cause public health concerns and ultimately require its demolition.

There are no other ongoing projects that would result in cumulative impacts and, as noted, long-term planning implications for the waterfront would be positive.

Based on the EAF and the submissions by ARC, the review and recommendations of Louis Berger, and as explained above, the Proposed Action – the demolition of Building 52 – would not have a potential significant adverse impact on the environment. The demolition would be done in accordance with a series of safety and environmentally protective measures, which have been reviewed by NYSDEC and EPA, as well as Berger. The loss of the building would not be a potential significant impact to an historic resource, particularly when considering the

absence of any foreseeable reuse for the building and the negative implications of delaying demolition. [2]

[2] Although not required, ARC assessed the comparative costs of demolition with "mothballing" the building until some productive reuse became available (if ever). The differences in cost are material, but this is not the reason that the Board has determined that demolition would not have a potential adverse environmental impact.

Louis Berger

Memorandum

DATE: November 10, 2016

TO: Board of Trustees, Village of Hastings-on-Hudson, NY

FROM: Len Warner and Sharon Bailey, Louis Berger U.S.

SUBJECT: Review of ARC Building 52 Demolition Submittals, Harbor at Hastings Site

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Louis Berger U.S. reviewed the documents submitted by Atlantic Richfield Co. (ARC) regarding the planned demolition of Building 52 at the former Anaconda site, including sampling results for the various construction materials present at the site. Comments on the proposed plans were summarized in a memorandum dated July 22, 2016 along with recommendations on additional work or items that would need to be addressed during the final planning stages. ARC responded to these comments and recommendations in a letter dated August 16, 2016, proposing modifications to these comments and recommendations which were resolved in a memorandum dated September 6, 2016 from Louis Berger U.S.

Based on the conceptual approach outlined in the various ARC submittals and correspondence with the Village, ARC has proposed a demolition program that addresses protection of human health and the environment during the demolition and a material handling process that is in general conformance with regulatory requirements. Acceptability of the implementation of this project approach will be confirmed based on a review of selected contractor work plans and other submittals from the selected contractor(s) prior to the start of demolition and ARC's incorporation of comments submitted by USEPA dated October 18, 2016.

If you have any questions regarding this information, please contact me at (914) 798-3721 or Sharon Bailey at (206) 453-1054.