

Remedial Method	Comply with ARARs	ELUR will include	O&M Obligations
<b>Do Nothing</b> (Fence & signage on all properties as a minimum temporary action)	No	N/A – An Order may be issued to the property owners, requiring them to maintain existing conditions and, prohibit disturbing the contaminated material	<ul style="list-style-type: none"> <li>To maintain the existing cover surface, maintain the fence &amp; warning signs</li> <li>No digging (to avoid spreading contamination)</li> <li>Site inspections with reporting to EPA &amp; DEP</li> <li>EPA Five Year Reviews</li> </ul>
<b>Cap with Impermeable Cover</b> (In many cases the site must be excavated to the depth of four feet to install the cap to maintain the existing grade for continued use.)	Yes	ELUR - Required <ul style="list-style-type: none"> <li>prohibit any activity that could compromise the cap including, limited or no digging, no excess loads, no building expansion</li> <li>restriction of activities on site, no underground tanks, no gasoline stations, no dry cleaners, no auto repair facilities</li> <li>Maintain/repair any damage to the cap</li> <li>If there is a building overlying waste on site the ELUR will require the building remain or be replaced or the footprint remediated if removed.</li> </ul>	<ul style="list-style-type: none"> <li>To monitor ground water into perpetuity, to verify the cap is still functioning as designed,</li> <li>Monthly inspect and maintain ground surface &amp; cap</li> <li>Maintain a surety adequate to pay for 5 years of cap maintenance and monitoring cost</li> <li>Cap inspections and monitoring reports submitted to DEP quarterly or annually</li> <li>EPA Five Year Reviews</li> </ul>
<b>Excavate all Raymark Waste to 15 feet</b> , except under a building (Clean Close)	Yes	ELUR - Not Required -or- <ul style="list-style-type: none"> <li>If there is a building overlying waste on site an ELUR will require the building remain or be replaced or the footprint remediated if removed.</li> </ul>	<ul style="list-style-type: none"> <li>Two years groundwater monitoring</li> <li>EPA Five Year reviews, only if waste remains on site below 15 feet.</li> </ul>
<b>Excavation to seasonal high water table</b> (or 4 ft, if water table is less than 4 ft below ground surface (BGS )	Yes	ELUR - Required <ul style="list-style-type: none"> <li>Prohibit excavation below the water table, (or greater than 3 feet BGS)</li> <li>If there is a building overlying waste on site an ELUR will require the building remain or be replaced or the footprint remediated if removed.</li> </ul>	<ul style="list-style-type: none"> <li>Two years ground water monitoring</li> <li>Annual report to DEP</li> <li>EPA Five Year Reviews</li> </ul>
<b>Excavation to 4 ft for DEC only</b> , permeable cap (assumes the water table is greater than four feet BGS)	No PMC is not addressed	ELUR – Required <ul style="list-style-type: none"> <li>Prohibit Excavation below 3 feet</li> <li>If there is a building overlying waste on site the ELUR will require the building remain or be replaced or the footprint remediated if removed.</li> </ul>	<ul style="list-style-type: none"> <li>Groundwater monitoring</li> <li>Annual report to DEP</li> <li>EPA Five Year Reviews</li> </ul>
<b>Excavation to 2 ft with Pavement</b> and permeable cap for DEC Only (assumes water table is greater than 2 feet BGS)	No PMC is not addressed	ELUR - Required <ul style="list-style-type: none"> <li>Prohibit excavation other than to replace or repair pavement</li> <li>Prohibit any activity that could compromise the paved surface</li> <li>If there is a building overlying waste on site an ELUR will require the building remain or be replaced or the footprint remediated if removed.</li> <li>Maintain the pavement in good condition</li> </ul>	<ul style="list-style-type: none"> <li>Ground water monitoring</li> <li>Inspect and maintain pavement as a component of the remedy (seal, crack repair</li> <li>Monthly inspections with Quarterly reports to DEP</li> <li>EPA Five Year Reviews</li> </ul>

**DEC** – Direct Exposure Criteria, the cleanup standards in state regulations (Remediation Standard Regulations, or RSRs) for direct human contact with contaminants (getting it on hands which could lead to inadvertent ingestion).

**PMC** – Pollutant Mobility Criteria, the cleanup standards in state regulations (RSRs) for leaching of contaminants into groundwater.