

NEW YORK CITY BROWNFIELD CLEANUP PROGRAM:

INFORMATION FOR
BROWNFIELD SITE OWNERS & DEVELOPERS

2010



NYC MAYOR'S OFFICE OF ENVIRONMENTAL REMEDIATION

253 BROADWAY, NEW YORK, NY 10007





The City of New York
Michael R. Bloomberg, Mayor

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NYC Brownfield Cleanup Program

Information for Brownfield Site Owners & Developers

The New York City Brownfield Cleanup Program (NYC BCP) is a new program operated by the New York City Mayor’s Office of Environmental Remediation (OER) to help land owners and developers clean up contaminated property and facilitate redevelopment. This program is part of the City’s response to the Brownfield problem outlined in PlaNYC, the City’s sustainability blueprint for the 21st century. Cleanup of Brownfields under this program provides opportunities for redevelopment and revitalization of contaminated vacant or underutilized properties across the five boroughs and will protect public health and the environment, increase job creation in affected communities, add local amenities and generate new revenue. OER also offers a wide range of associated Brownfield and community benefit programs including financial incentives (*see page 4 for a description of OER’s Brownfield Incentive Grants*), technical assistance and community education (*see OER’s Brownfield Community Service Report for a complete description*). Properties that are properly remediated through the NYC BCP receive a Notice of Completion, which includes a New York City liability release and issuance of a NYC Green Property Certification that symbolizes the City’s confidence that the property is protective of public health and the environment.

The NYC BCP is now accepting applications for enrollment.

This report describes, from beginning to end, the steps and requirements for participation in the NYC BCP. Interested parties are encouraged to contact OER for more information. This report also provides information on how to obtain financial assistance for Brownfield projects and how you can locate Brownfields in NYC for redevelopment.

PROGRAM ELIGIBILITY

The first step in determining whether a site is a good candidate for the NYC BCP is to determine whether the site and the interested party are eligible for enrollment.

Eligible Sites

Participation in the NYC BCP is open to all real property in the City of New York. However, some specific types of sites are ineligible for enrollment in the NYC BCP including:

- sites that are already enrolled in New York State Brownfield Cleanup Programs;
- sites listed in the NYS Department of Environmental Conservation (DEC) Registry of Inactive Hazardous Waste Disposal Sites;

CONTENTS

PROGRAM ELIGIBILITY.....	1
PRE-APPLICATION PROCESS.....	3
APPLICATIONS.....	4
AGREEMENTS.....	4
PROGRAM FEE.....	5
REMEDIAL INVESTIGATION.....	5
REMEDIAL ACTION.....	6
CITIZEN PARTICIPATION.....	7
PERMITS.....	8
REMEDIAL ACTION REPORT.....	9
ENGINEERING AND INSTITUTIONAL CONTROLS.....	10
SITE MANAGEMENT PLAN.....	10
DECLARATION OF COVENANTS AND RESTRICTIONS.....	10
NOTICE OF COMPLETION.....	10
LIABILITY LIMITATION.....	10
CONTACT OER.....	11

DEFINITIONS

Brownfield - for the purposes of the NYC Brownfield Cleanup Program, a brownfield is any real property within New York City where the redevelopment or reuse may be complicated by the presence or potential presence of contamination.

Contamination - Includes hazardous waste (and petroleum, as established by agreement with New York State), in any environmental media including soil, historic fill, surface water, groundwater, soil vapor or indoor air.

Applicant - An applicant is a person or entity that has applied for entry into the NYC Brownfield Cleanup Program but does not yet have an executed agreement with OER.

Enrollee - An enrollee is a person or entity that has been accepted into the NYC Brownfield Cleanup Program and has a fully executed NYC Brownfield Cleanup Agreement.

Volunteer - A volunteer is an enrollee that is not liable for the disposal or discharge of contaminants at the site, or whose liability arises solely from site ownership acquired after the disposal/discharge of contaminants, provided that the property owner has taken reasonable steps to stop any continuing release, prevent any threatened future release, and prevent or limit human, environmental, or natural resource exposures to any previously released contaminant.

Participant - A participant is an enrollee that owned or operated the site during the time of site contamination or who is otherwise responsible for the contamination.

Brownfield Opportunity Area (BOA) – The New York State Department of State’s Brownfield Opportunity Area program provides municipalities and community based organizations with assistance, up to 90 percent of eligible costs, to complete revitalization plans and implementation strategies for areas or communities affected by brownfield sites, and to perform site assessments for strategic sites.

- sites on the USEPA National Priorities List;
- hazardous waste treatment, storage, or disposal facilities permitted under ECL §27-0901;
- sites subject to a cleanup order under the Navigation Law or the Environmental Conservation Law; or
- sites subject to an on-going State or Federal enforcement action regarding solid/hazardous waste or petroleum.

In addition, under certain circumstances, sites may be deemed ineligible for participation in the NYC BCP by OER.

Sites that are subject to existing State authority for investigation or cleanup may be eligible if enrolled as a Coordinated Brownfield Site (*see What is a Coordinated Brownfield Site? on next page*).

Eligible Parties

All parties are eligible to participate in the NYC BCP except parties subject to:

- a judicial or administrative proceeding involving a site where a government agency seeks penalties against a party for the investigation or remediation of contamination; or



A BROWNFIELD CAN BE A VACANT OR UNDERUTILIZED PROPERTY WHERE CONTAMINATION MAY HINDER REDEVELOPMENT

WHAT IS A COORDINATED BROWNFIELD SITE?

A Coordinated Brownfield Site is a site that is enrolled in the NYC BCP that is also subject to an existing NYS authority for investigation or cleanup.

An example of a Coordinated Brownfield Site is a property that contains petroleum contamination that requires management under the authority of the New York State Department of Environmental Conservation (NYS DEC). Under an agreement between NYC OER and NYS DEC, parties who seek to remediate a property in New York City that contains petroleum contamination can enroll in the New York City Brownfield Cleanup Program (NYC BCP). The petroleum contamination is then managed under the authority of NYS DEC according to the terms of the agreement, while the remainder of the property is managed under the authority of the NYC BCP.

- an order against a party providing for the investigation and remediation of contamination at a site.

OER encourages all parties to contact the office to answer questions about site-specific or party-specific program eligibility.

PRE-APPLICATION PROCESS

OER requires that all applicants schedule a pre-application meeting and project scoping session to review program requirements and procedures for enrolling in the NYC BCP and completing a NYC BCP project. It is strongly recommended that this meeting be attended by the Applicant, the Applicant's environmental consultant and counsel. Participation in these meetings will also include OER's NYC BCP Coordinator, Project Manager and counsel.

Prior to the meeting, an Applicant should fill out and submit a pre-application worksheet summarizing redevelopment plans and known environmental information for the site. The pre-application worksheet can be downloaded from OER's website at www.nyc.gov/NYCBCPdocs.

Scheduling a Pre-Application Meeting

To schedule a NYC BCP pre-application meeting, contact OER at (212) 788-8841 or via email at NYCBCPapplicant@cityhall.nyc.gov.

NYC BCP PRE-APPLICATION AND APPLICATION PROCESS

1

Schedule a Pre-Application Meeting with OER

Contact:
(212) 788-8841 or
NYCBCPapplicant@cityhall.nyc.gov

2

Complete and Submit an OER Pre-Application Worksheet

www.nyc.gov/NYCBCPdocs

3

Attend a Pre-Application Meeting with OER

4

Scope and Perform a Remedial Investigation

5

Scope and Prepare a Draft Remedial Action Work Plan

6

Submit an Application for Enrollment into the NYC BCP to:

Daniel C. Walsh Ph.D., Director
Mayor's Office of Environmental Remediation
100 Gold Street, 2nd Floor
New York, NY 10038
Attention: NYC BCP Application

NYC'S BROWNFIELD INCENTIVE GRANT (BIG) PROGRAM

- Brownfield Incentive Grants are available to provide financial assistance for qualifying brownfield properties, preferred community development projects, and applicants for and recipients of Brownfield Opportunity Area (BOA) grants.



GRANTS CAN BE USED TOWARDS:

- PRE-DEVELOPMENT DESIGN STUDIES
- ENVIRONMENTAL INVESTIGATIONS
- ENVIRONMENTAL CLEANUPS
- PURCHASE OF ENVIRONMENTAL INSURANCE
- TECHNICAL ASSISTANCE SERVICES FOR NOT-FOR-PROFIT GROUPS
- TECHNICAL ASSISTANCE SERVICES FOR GROUPS INTERESTED IN DEVELOPING APPLICATIONS FOR THE BOA PROGRAM
- LOCAL MATCH FUNDING FOR EXISTING BOA GROUPS

- The BIG Program also offers bonus grants for permanent "Track-1" cleanups, for BOA strategic properties enrolled in the NYC Brownfield Cleanup Program and for sites that have completed E-Designation or Restrictive Declaration Hazardous Materials cleanups (see *OER's Brownfield Incentive Grant (BIG) Program report at www.nyc.gov/BIG for a complete description of grants*).



- Total grant award amounts vary, but generally range to as much as \$60,000 or \$100,000 for most projects.
- The BIG program is a streamlined process that promptly pays out grant awards, and provides higher grant cap amounts for preferred community development projects.

APPLICATIONS

After a pre-application meeting has occurred and a Remedial Investigation has been performed, an applicant should complete a NYC BCP application form. Applications can be obtained online at www.nyc.gov/NYCBCPdocs, and once completed, should be mailed in electronic form to OER along with an executed NYC Brownfield Cleanup Agreement, the Remedial Investigation Report, a draft Remedial Action Work Plan and a check or money order for the program fee. Templates for all work plans and reports required under the NYC BCP are available from OER (see *page 6: Template for Work Plans and Reports, for more information*).

AGREEMENTS

Participation in the NYC BCP requires a fully executed NYC Brownfield Cleanup Agreement (NYC BCA). Enrollees can then conduct remedial action under OER's oversight. Remedial obligations vary depending on the enrollee's status as either a volunteer or a participant (see *Definitions*

on page 2).

The NYC Brownfield Cleanup Agreement covers the following programmatic elements:

- site description;
- enrollee identification;
- enrollee status as a participant or volunteer;
- submission and implementation of a Citizen Participation Plan;
- development and implementation of work plans;
- submission and review of reports;
- submission of progress reports;
- enforcement as a contractual agreement;
- payment of the program fee;
- liability limitation;
- reservation of rights;

CITIZEN PARTICIPATION MILESTONES

Public notice occurs at three milestones during each NYC BCP project. These milestones include:

Public Notice announcing the availability of the NYC BCP Application, Remedial Investigation Report, Remedial Action Work Plan and a 30-day public comment period

Public notice in the form of a fact sheet is provided to all parties on the Site Contact List. The fact sheet specifically announces the availability of a completed NYC BCP Application, a Remedial Investigation Report, a Remedial Action Work Plan and the initiation of a 30-day public comment period on the NYC BCP Application and Remedial Action Work Plan. The fact sheet summarizes the findings of the Remedial Investigation Report and the Remedial Action Work Plan.

Public Notice announcing the start of the Remedial Action

Public notice in the form of a fact sheet is sent to all parties on the Site Contact List announcing the start of cleanup activities at the site.

Public Notice announcing the completion of the Remedial Action and description of any Engineering or Institutional Controls

Public notice in the form of a fact sheet is sent to all parties on the Site Contact List announcing the completion of cleanup activities and summarizing any Engineering or Institutional Controls that will be in place at the site (*see page 9 for a description of Engineering and Institutional Controls*).

- indemnification of NYC;
- change of use;
- Declaration of Covenants and Restrictions;
- communications;
- termination; and
- miscellaneous provisions.

An enrollee may terminate a NYC BCA at any time upon written notification to OER. In addition, OER may terminate the NYC BCA upon an enrollee's failure to comply with the terms and conditions of the agreement.

PROGRAM FEE

Each program enrollee is responsible for paying a program fee. Program fees, in the form of a check or money order, should be made payable to "New York City Department of Environmental Protection" and should be attached to the executed agreement. Please contact OER to confirm the program fee amount and mailing address.

REMEDIAL INVESTIGATION

A Remedial Investigation (RI) is required to define the source, nature and extent of contamination in soil, groundwater and soil vapor at the site to enable the selection of a remedy that is protective of public health and the environment. A RI is performed prior to enrollment into the NYC BCP. Parties that are interested in enrolling in the NYC BCP should attend a RI scoping session with OER to ensure that all work is performed and reported in a manner that complies with program requirements.

Remedial Investigation Report

A Remedial Investigation Report (RIR) provides information required to understand contaminant distribution and behavior on a property and provides the basis for selection of an appropriate remedy. The basic goals of the Remedial Investigation Report for a property include:

CONTEMPLATED USE CLASSES AND REMEDIATION TRACKS

There are four categories of intended use for a site:

- unrestricted
- restricted residential
- restricted commercial
- restricted industrial

To render a site protective for its contemplated use, the NYC BCP uses the State's soil cleanup standards and alternative cleanup tracks found at 6NYCRR Part 375-3.6.

Parties should contact OER for more information about cleanup requirements

- identify all potential sources of contamination based on investigation of past uses;
- define the nature and extent of contamination in all media both laterally and vertically;
- perform a human health exposure assessment;
- assess contaminant fate and transport including the existing and potential impacts on groundwater, soil and soil vapor; and
- produce data of sufficient quantity and quality to support the development of an acceptable Remedial Action Work Plan.

The Remedial Investigation Report should be developed in a manner consistent with existing guidance for implementation of voluntary cleanup programs in New York State. OER provides a template for the RIR that gives detailed guidance for the structure and content of the document (*see this page: Templates for Work Plans and Reports, for more information*). The RIR must be submitted to OER with the application for enrollment in the NYC BCP.

REMEDIAL ACTION

Remedial Action Work Plan

The Remedial Action Work Plan (RAWP) describes all of the remedial actions that are necessary to render a site protective of public health and the environment for the

TEMPLATES FOR WORK PLANS AND REPORTS

OER has developed templates to provide specific guidance on work plans and reports required under the NYCBCP. Templates make document preparation easier for enrollees and make the process of navigation through the NYC BCP more predictable. They also enable OER Project Managers to provide faster review of work plans and reports. Contact OER for more information.

intended use (*see information on this page: Contemplated Use Classes and Remediation Tracks*). Every RAWP is subject to a 30-day public comment period that begins upon submission of the draft plan to OER. Each RAWP must be approved by OER prior to implementation.

The RAWP must be developed in a manner that is consistent with existing guidance for the implementation of voluntary cleanup programs in New York State. OER will provide a template for the RAWP (*see this page: Templates for Work Plans and Reports, for more information*).

As part of each RAWP, the enrollee must include a remedial alternatives analysis that provides a basis for the proposed remedial action, and explains why the remedial action is protective of public health and the environment for the intended use (*see details on the next page: Remedy Selection Criteria*). The RAWP also includes a remedial work schedule, a Health and Safety plan, a description of all Engineering and Institutional Controls and an explanation of site management requirements to be implemented after successful completion of the remedy.

Remedial Action Work Plans also include a Community Protection Statement that summarizes community protections that will be established during the remedial process. The Community Protection Statement is written in accessible, non-technical language so that community members are able to easily understand the work to be performed. It summarizes such issues as the community air monitoring plan, all odor, dust and noise control measures, hours of operation, and other good housekeeping practices that will be implemented at each NYC BCP site.

Sustainability Statement

OER has introduced a Sustainability Statement to the RAWP, which identifies all sustainability efforts that will be implemented during the remedial action. While no specific sustainability efforts are required, OER requests that each enrollee consider implementing Green Remediation measures. Specific areas that may be considered include:

- reducing waste production, maximizing recycling and the reuse of clean materials;
- reducing the consumption of virgin and non-renewable resources;
- minimizing energy consumption and greenhouse gas emissions;
- improving energy efficiency;
- coordinating remediation with green building design;
- enhancing stormwater management and, where appropriate, gray water reuse; and
- enhancing ecology and biodiversity during landscaping of remediated sites.

Each enrollee is strongly encouraged to explore additional ways to achieve sustainability goals beyond those previously outlined. OER will provide a template for the Community Protection Statement and the Sustainability Statement within the RAWP template that addresses these suggested areas.

CITIZEN PARTICIPATION

A Citizen Participation Plan is a required component of the NYC BCP. Enrollees for all projects must keep the public informed during the NYC BCP in the following ways:

Document Repositories

Document repositories make the principal documents produced during the remedial program available so that the community can review them. These documents include Remedial Investigation Reports, Remedial Action Work Plans and Reports and all public notices issued during the project. Preferred repository locations are generally the most convenient public library for the community with evening and weekend hours.

REMEDY SELECTION CRITERIA

The remedial alternatives analysis must consider the following factors during the selection of the remedy:

Threshold Criteria - all remedies must satisfy threshold criteria for the intended use:

- Protection of public health; and
- Protection of the environment.

Balancing Criteria:

- Compliance with standards, criteria and guidance;
- Short-term effectiveness and impacts;
- Long-term effectiveness and permanence;
- Reduction of toxicity, mobility and volume of contaminated material;
- Implementability;
- Cost effectiveness;
- Community Acceptance;
- Land use; and
- Sustainability of the remedial action.

PERMANENT REMEDIES, INCLUDING COMPLETE SOURCE ELIMINATION BY REMOVAL OR TREATMENT ON-SITE, ARE PREFERRED.

Engineering and Institutional Controls can be employed in the remedy if pathways for human health exposure are addressed and off-site migration is controlled. Potential human health exposure pathways will be evaluated by NYC Department of Health and Mental Hygiene (NYC DOHMH). OER will obtain the concurrence of the NYC DOHMH prior to approving the RAWP.

Digital Documentation

OER strongly encourages the use of digital documents in repositories as a means of resource conservation while also increasing convenience in access and ease of use.

IDENTIFYING SITES FOR CLEANUP

- As OER's NYC Brownfield Cleanup Program, Brownfield Incentive Grant (BIG) Program and community education events continue to increase interest in brownfields, the City is ready to assist developers and other brownfield stakeholders in identifying potential project sites in a completely new way.



- The *SPEED* (Searchable Property Environmental e-Database) portal is an on-line GIS-based application that enables users to examine environmental and other data on properties throughout New York City.
- One important data layer in the *SPEED* portal, the Vacant Property Database (VPD), provides previously difficult-to-access historic land use and Phase I-type environmental information for over 3,000 vacant privately-owned commercial and manufacturing lots. The *SPEED* portal is accessible from OER's website.
- The *SPEED* portal also allows users to access information about sites that has been collected from City, State, and Federal environmental remediation programs. Furthermore, *SPEED* incorporates a variety of map tools, aerial photos, political and geographic districts, and building footprint maps. Users can browse by navigating with the map interface or by searching for desired properties or locations, create reports, or print maps showing spatial information.
- OER expects the *SPEED* portal to become an important tool in promoting brownfield cleanup and economic development in NYC.

Public Notice and Public Comment

OER will approve a Site Contact List for each NYC BCP project that will be used to inform the public of important project information and invite public comment at specified steps during the remedial program. The Site Contact List will include owners and occupants of on-site and adjacent buildings and residences, administrators of nearby schools, hospitals and day care centers, the local Community Board, and elected officials. Members of the public can request to be added to the Site Contact List.

Public notice to all members of the Site Contact List is required at three milestones achieved during the remedial program (*see list on page 5: Citizen Participation Milestones*). Notices will consist of a fact sheet that includes descriptive project summaries, updates on recent and upcoming project activities, repository information, and OER contact information.

Final review of work plans by OER will consider all public comments. OER will not approve work plans until the public comment period has been completed.

PERMITS

Participation in the NYC BCP does not exempt enrollees from obtaining all City, State or Federal permits necessary for performance or completion of investigation, remedial or development tasks. Each enrollee must identify and obtain all necessary permits, including those required by New York State Department of Environmental Conservation, New York State Department of State and the US Army Corps of Engineers.

NYC Green Team



To provide assistance in obtaining City permits, OER has created the Green Team, which is a group of OER project managers who can assist program enrollees in acquiring permits

ENGINEERING AND INSTITUTIONAL CONTROLS

ENGINEERING CONTROLS are physical controls employed to contain, stabilize, or monitor residual contamination, or to eliminate potential exposure pathways to contamination. Engineering Controls include, but are not limited to, site covers such as clean soil or pavement, subsurface barriers, vapor barriers, fences and other access controls. Engineering Controls are generally used in conjunction with Institutional Controls.

INSTITUTIONAL CONTROLS are non-physical controls that eliminate exposure to residual contamination at remediated sites. Examples include restriction on the use of groundwater and a requirement that redeveloped sites be limited to their intended use.

EXAMPLES OF ENGINEERING CONTROLS

CLEAN SOIL COVER



PAVEMENT COVER



VAPOR BARRIER



from City agencies that are required for activities conducted during the investigation and remedial phases of brownfield redevelopment. An OER Green Team member serves as a liaison between OER and the following City agencies: the Department of Environmental Protection, the Department of Buildings, the Department of Transportation, the Department of Sanitation, the Business Integrity Commission, the Fire Department and the Department of Parks and Recreation. The Green Team is available to assist enrollees in overcoming unforeseen impediments or delays that may arise in obtaining City permits required during the remedial process. Enrollees are encouraged to contact their project manager to obtain assistance from the Green Team.

REMEDIAL ACTION REPORT

Upon completion of the remedial action, an enrollee must submit a Remedial Action Report (RAR) to OER. A template will be provided by OER (*see page 6: Templates for Work Plans and Reports, for more information*). Among other information, the RAR will include:

- a certification that remediation requirements outlined in the RAWP have been achieved;
- a full description of all Engineering and Institutional Controls to be used at the site;
- an approvable Site Management Plan that includes the intended management of all Engineering and/or Institutional Controls; and

- an executed Declaration of Covenants and Restrictions (if Engineering or Institutional Control are employed).

ENGINEERING CONTROLS AND INSTITUTIONAL CONTROLS

Engineering Controls and Institutional Controls are physical and non-physical controls commonly used to enable long-term management of residual contamination at remedial sites after completion of the approved remedial actions (*see information on page 9: Engineering and Institutional Controls*). If Engineering Controls and Institutional Controls are part of a site cleanup plan, the RAWP and RAR must describe the mechanisms that will be used to implement, maintain, monitor, and report on these restrictions and controls.

SITE MANAGEMENT PLAN

All Engineering and Institutional Controls are managed according to an OER-approved Site Management Plan (SMP) submitted as part of the RAR. OER will approve the SMP and RAR prior to issuance of the Notice of Completion.

The Site Management Plan provides for periodic inspection and certification of the Engineering and Institutional Controls. These safeguards ensure that the site remains protective of public health and the environment, and that future changes at the site will not interfere with the remedy.

DECLARATION OF COVENANTS AND RESTRICTIONS

For any project that relies on Engineering and Institutional Controls to maintain a protective cleanup, the enrollee must file an OER-approved Declaration of Covenants and Restrictions with the recording office of the county in which the site resides. This document, which is filed with the deed to the property, describes all restrictions on the use of the property that the approved RAWP requires and notes the existence and requirements of the SMP. The City is authorized to enter and inspect any property subject to a Declaration of Covenants and Restrictions to ensure compliance with the SMP.

Since the Declaration of Covenants and Restrictions can only be filed by a property owner, ownership of the site or an agreement with the owner may be required in order to successfully complete the NYC BCP.

GREEN PROPERTY CERTIFICATION



A Green Property Certification signifies that the enrollee conducted Remedial Investigation and Remedial Action under the supervision of the New York City Office of Environmental

Remediation and that the City acknowledges that the site is fully protective of public health and the environment for its intended use.

A record of this certification will be maintained by OER and may be used by enrollees and their successors to communicate the highly protective status of the property to prospective purchasers, lessees, and occupants.

NOTICE OF COMPLETION

Completion of the NYC BCP occurs when a Notice of Completion is issued by the Director of OER to the enrollee. This occurs after OER has determined that all remedial requirements, as defined in the approved RAWP, have been achieved at the site and after all remedial actions have been properly documented in an OER-approved Remedial Action Report. Upon issuance of the Notice of Completion, an enrollee is eligible for a NYC Green Property Certification for the Site (*see this page for details on the Green Property Certification*).

LIABILITY LIMITATION

At the time that the Notice of Completion is issued to the enrollee, the City of New York acknowledges that the enrollee has no further environmental liability to the City with respect to the enrolled site, subject to certain reopeners. This liability limitation is assignable to the enrollee's successors and assigns who take title to, develop, or otherwise occupy the site, provided such parties adhere to the requirements of the NYC BCA.

CONTACT OER

For more information on any of the programs included in this report:

- Visit OER's website: www.nyc.gov/oer
- Email OER: brownfields@cityhall.nyc.gov
- Call OER: (212) 788-8841
- To download the NYC BCP regulations: http://nyc.gov/html/oer/downloads/pdf/NYC_BCP_final_rule.pdf



