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**Division of Environmental Remediation**

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**Record of Decision**

**123 Post Avenue Site  
Operable Unit No. 1  
Westbury, Nassau County, New York  
Site Number 1-30-088**

**March 2003**

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# **DECLARATION STATEMENT - RECORD OF DECISION**

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## **123 Post Avenue Inactive Hazardous Waste Disposal Site Operable Unit No. 1 Westbury, Nassau County, New York Site No. 1-30-088**

### **Statement of Purpose and Basis**

The Record of Decision (ROD) presents the selected remedy for Operable Unit 1 of the 123 Post Avenue Site, a Class 2 inactive hazardous waste disposal site. The selected remedial program was chosen in accordance with the New York State Environmental Conservation Law and is not inconsistent with the National Oil and Hazardous Substances Pollution Contingency Plan of March 8, 1990 (40CFR300), as amended.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (NYSDEC) for Operable Unit 1 of the 123 Post Avenue inactive hazardous waste disposal site, and the public's input to the Proposed Remedial Action Plan (PRAP) presented by the NYSDEC. A listing of the documents included as a part of the Administrative Record is included in Appendix B of the ROD.

### **Assessment of the Site**

Actual or threatened release of hazardous waste constituents from this site have been addressed by implementing the interim remedial measures identified in this ROD. The removal of contaminated soil from the site and implementation of a soil vapor extraction (SVE) system have significantly reduced the threat to public health and the environment. Therefore, a groundwater monitoring program will be implemented to monitor the effectiveness of interim remedial actions in preventing further contamination of the groundwater.

### **Description of Selected Remedy**

Based on the results of the Remedial Investigation (RI) for the 123 Post Avenue (OU-1) Site and the interim remedial measures which were implemented, the NYSDEC has selected No Further Action for this site. The components of the remedy are as follows:

1. Continued operation of the SVE system until the remedial objectives have been achieved.
2. Continued monitoring of the groundwater and indoor air quality.

3. Institutional controls will be imposed in the form of existing use and development restrictions, preventing the use of groundwater as a source of potable or process water without necessary water quality treatment as determined by the Nassau County Department of Health (NCDOH)
4. As a contingency, the approved air sparging (AS) design would be implemented if groundwater contaminant concentrations rebound.
5. Annual certification that the institutional controls put in place have not been altered and are still effective.

**New York State Department of Health Acceptance**

The New York State Department of Health (NYSDOH) concurs that the remedy selected for this site is protective of human health.

**Declaration**

The selected remedy is protective of human health and the environment, complies with State and Federal requirements that are legally applicable or relevant and appropriate to the remedial action to the extent practicable, and is cost effective. This remedy utilizes permanent solutions and alternative treatment or resource recovery technologies, to the maximum extent practicable, and satisfies the preference for remedies that reduce toxicity, mobility, or volume as a principal element.

03/31/03

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Date

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Dale A. Desnoyers, Director  
Division of Environmental Remediation

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# **RECORD OF DECISION**

**123 Post Avenue Site  
Operable Unit No. 1  
Westbury, Nassau County, New York  
Site No. 1-30-088  
March 2003**

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## **SECTION 1: SUMMARY OF THE RECORD OF DECISION**

The New York State Department of Environmental Conservation (NYSDEC), in consultation with the New York State Department of Health (NYSDOH), has selected a remedy for the 123 Post Avenue Site, Operable Unit 1 (on-site soils and groundwater). As more fully described in Sections 3 and 5 of this document, illegal dumping and poor housekeeping resulted in the disposal of perchloroethene (PCE), a hazardous waste. This waste contaminated soils, groundwater and indoor air at the site, and resulted in:

- a significant threat to human health associated with a potential exposure to contaminants in indoor air and public and private water supplies.
- a significant environmental threat associated with the impacts of contaminants to the groundwater resource in the upper glacial aquifer.

During the course of the investigation, certain actions, known as interim remedial measures (IRMs), were undertaken at the 123 Post Avenue (OU-1) Site in response to the threats identified above. An IRM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the remedial investigation/feasibility study (RI/FS). The IRMs undertaken at this site included installation of a soil vapor extraction (SVE) system to remediate contaminated soils and installation of portable air purifiers to remediate contaminated indoor air.

Based on the implementation of the above IRMs, the findings of the investigation of this site indicate that the site no longer poses a significant threat to human health or the environment, therefore, No Further Action, with continued operation of the SVE system, was selected as the remedy for this site.

The selected remedy, discussed in detail in Section 6, is intended to attain the remediation goals identified for this site in Section 6. The remedy must conform with officially promulgated standards and criteria that are directly applicable, or that are relevant and appropriate. The selection of a remedy must also take into consideration guidance, as appropriate. Standards, criteria and guidance are hereafter called SCGs.

## **SECTION 2: SITE LOCATION AND DESCRIPTION**

The 123 Post Avenue site, located at 123 Post Avenue in the Village of Westbury, Nassau County (Figure 1), consists of a 50-foot by 189-foot lot (approximately 0.2 acres) located in a densely populated commercial/residential area (Figure 2). The site contains a one story, 3,500 square foot masonry building built in 1949. A strip mall consisting of three businesses (a delicatessen, a tailor and a chiropractor) at ground level and residences on the second floor, is located north of the site. In addition, a multi-story apartment complex is located northwest of the site. The dry cleaner is situated on the northern property boundary of the Long Island Rail Road, and is located 20 feet from the concrete wall which supports the raised track. The area is serviced by municipal water and sewer.

Operable Unit No. 1 (OU-1), which is the subject of this ROD, consists of the 0.2 acre dry cleaner property. An operable unit represents a portion of the site remedy that for technical or administrative reasons can be addressed separately to eliminate or mitigate a release, threat of release or exposure pathway resulting from the site contamination. The other operable unit for this site, OU-2, consists of off-site contaminated groundwater (Figure 1). The source of this off-site contamination originates from OU-1. OU-2 is the subject of a State-funded groundwater investigation which is ongoing. A remedy for OU-2 is expected to be proposed in early 2004.

## **SECTION 3: SITE HISTORY**

### **3.1: Operational/Disposal History**

The 123 Post Avenue site has operated as a dry cleaning facility since the 1950s. The site was placed on the NYS Registry of Inactive Hazardous Waste Disposal Sites in December of 1998 after the Nassau County Department of Health (NCDOH) performed a facility inspection in July 1995 and subsequent investigations by the NCDOH and the potential responsible party (PRP) which showed elevated levels of site-related perchloroethene (PCE) contamination in soils and groundwater.

In response to a pending property transaction, additional environmental investigations were conducted in October 1997 at 117 Post Avenue, located directly south and downgradient of 123 Post Avenue (Figure 2). This groundwater investigation, which included the installation of 7 wells, revealed shallow groundwater contamination (principally PCE) on this property at elevated levels. The source of contamination was suspected to be the 123 Post Avenue site.

### **3.2: Remedial History**

In 1998, the NYSDEC listed the site as a Class 2 site in the Registry of Inactive Hazardous Waste Disposal Sites in New York. A Class 2 site is a site where hazardous waste presents a significant threat to the public health or the environment and action is required.

In August 1998 (prior to the implementation of this RI/FS), excavation of contaminated soils beneath the 2 floor drains (FD#1 - boiler room and FD#2 - work room) was performed (Figure 3). Following excavation, FD#2 remained contaminated with levels of PCE up to 270 ppm.

#### **SECTION 4: ENFORCEMENT STATUS**

Potentially Responsible Parties (PRPs) are those who may be legally liable for contamination at a site. This may include past or present owners and operators, waste generators, and haulers.

The PRPs for the site, documented to date, include:

Choe Realty, LLC is a limited liability company organized under the laws of the State of New York and is the current owner of the site.

The NYSDEC and Choe Realty, LLC entered into a Consent Order on September 25, 2000. The Order obligates the responsible parties to implement a full remedial program for OU-1.

#### **SECTION 5: SITE CONTAMINATION**

A remedial investigation (RI) has been conducted to evaluate the environmental conditions at the site and to identify the significant threats to human health.

##### **5.1: Summary of the Remedial Investigation**

The purpose of the RI was to define the nature and extent of any contamination resulting from previous activities at the site. The RI fieldwork was initiated in October 2000 and final installation of an IRM was completed in June 2001. See Section 5.2 below which describes IRM activities performed at this site. The field activities and findings of the investigation are described in greater detail in the RI report.

The following activities were conducted during the RI:

- Investigation of on-site soils to determine the vertical and horizontal extent of PCE contamination in the vicinity of the former sanitary system;
- Installation of 3 soil borings and collection of 9 discrete groundwater samples at three depths using direct push technology;
- Sampling of 3 existing monitoring wells.

In addition to the field activities above, which were conducted by the responsible party, the NYSDEC, in conjunction with the NYSDOH and the NCDOH, conducted extensive indoor air sampling in adjacent residential and commercial structures. In all, up to 24 different locations were sampled during 10 sampling events between February 2001 and the present.

To determine whether the soil, groundwater and indoor air contain contamination at levels of concern, data from the investigation were compared to the following SCGs:

- Groundwater and drinking water SCGs are based on NYSDEC “Ambient Water Quality Standards and Guidance Values” and Part 5 of the New York State Sanitary Code.
- Soil SCGs are based on the NYSDEC “Technical and Administrative Guidance Memorandum (TAGM) 4046; Determination of Soil Cleanup Objectives and Cleanup Levels”.
- Concentrations of PCE in air were compared to the NYSDOH’s guideline for PCE in air (100 micrograms per cubic meter,  $\mu\text{g}/\text{m}^3$ ).

Based on the RI results, in comparison to the SCGs and potential public health and environmental exposure routes, certain media and areas of the site require remediation. These are summarized below. More complete information can be found in the RI report.

### **5.1.1: Site Geology and Hydrogeology**

Long Island is situated on bedrock overlain by sediment. Three major aquifers comprise most of Long Island’s water supply. The Lloyd sand member is the deepest aquifer (resting directly on the bedrock). The Magothy formation is above the Lloyd and consists of layers of fine sands, clays, silts and some coarse beds of sand and gravel. Above the Magothy aquifer is the Upper Glacial aquifer, consisting of fine to coarse layers of sand and gravel, boulders, and clay. The Magothy is the principal water supply aquifer in this area. The Upper Glacial aquifer is not typically used for water supply in Nassau County due to the greater likelihood of contamination.

On-site groundwater is found at a depth of approximately 35 feet below ground surface in the vicinity of the site. Groundwater flow is towards the south-southwest

The public water supply wells in the vicinity of the site draw water from the Magothy aquifer. The nearest public water supply well downgradient of the site is the Westbury Water District # 11 well (N-5654) located 2000 feet south-southwest of the site (Figure 1). This well draws water from a depth of 474 feet to 535 feet and yields approximately 2,000,000 gallons per day. The nearest private well downgradient of the site is a shallow well operated by the Big M Car Wash. This well is located just west of Well # 11 (Figure 1) and yields approximately 37 gallons per minute from the Upper Glacial aquifer at a depth of 54 feet to 64 feet. The water from this well is used for car-washing only.

It is unknown whether a significant clay barrier exists in the vicinity of the 123 Post Avenue site which would prevent contaminants from migrating to the Magothy aquifer from the Upper Glacial aquifer. While the 123 Post Avenue Site may represent a source of contamination for downgradient water supply wells, there is no evidence to suggest that this is happening.

### **5.1.2: Nature of Contamination**

As described in the RI report, many soil, groundwater and indoor air samples were collected to characterize the nature and extent of contamination. As summarized in Table 1, the only category of contaminants that exceed their SCGs are volatile organic compounds (VOCs).

The VOCs of concern are perchloroethene (PCE) trichloroethene (TCE) and cis 1,2 dichloroethene (DCE). The primary contaminant onsite is PCE, a dry-cleaning solvent. This solvent was disposed of onsite in floor drains and migrated downward into the underlying soils and groundwater, resulting in significant on-site soil and groundwater impacts as well as extensive off-site impacts to the Upper Glacial aquifer (Figure 4). PCE has also migrated through soil in the form of vapors, impacting nearby residential and commercial structures (Figure 5).

### **5.1.3: Extent of Contamination**

This section describes the findings of the investigation for all environmental media that were investigated.

Chemical concentrations are reported in parts per billion (ppb) for water, parts per million (ppm) for soil and micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) for air samples. For comparison purposes, where applicable, SCGs are provided for each medium.

Table 1 summarizes the degree of contamination for the contaminants of concern in on-site soils, groundwater and indoor air and compares the data with the SCGs for the site. Table 2 presents all indoor air data collected during the Remedial Investigation for OU-1. The following are the media which were investigated and a summary of the findings of the investigation.

#### **Subsurface Soil**

In October 2000, 12 shallow subsurface soil samples were collected in the vicinity of a former on-site sanitary system located between the front of the dry cleaners and Post Avenue (Figure 3). Samples were collected at four locations (SS-1, SS-2, SS-3 and SS-4) at three depths (16 feet to 20 feet, 20 feet to 24 feet and 30 feet to 34 feet). Data from these samples indicate that no PCE or related VOCs were present in soil samples in the vicinity of the former sanitary system. This information, in conjunction with previous investigations (Section 3 of this ROD) indicate that on-site soil contamination is limited to the soils beneath the two indoor floor drains (FD#1 and FD#2).

#### **Groundwater**

On-site groundwater data was collected during several sampling rounds from three water table monitoring wells (MW#1, MW#2 and MW#3) installed in March 1999, prior to the onset of this Remedial Investigation (Figure 3). MW#1 is located on the northeast corner of the dry cleaner, upgradient or side-gradient of the source area. MW#2 and MW#3 are located downgradient of the source area. In addition,

groundwater data was collected from three direct push borings (GW#1, GW#2 and GW#3) installed in October 2000 during the Remedial Investigation (Figure 3). Samples were collected from three depths (36 feet-40 feet, 56 feet-60 feet and 76 feet-80 feet) located on the downgradient side of the dry cleaners and designed to delineate the vertical extent of the on-site groundwater plume.

Table 1 shows the results of 6 rounds of groundwater samples collected between March 1999 and September 2002 and one round of vertical profile samples collected on October 4, 2000. Several observations can be made from the data:

- PCE is the primary contaminant found in the groundwater;
- Levels of PCE up to 23,000 ppb have been detected in the on-site groundwater;
- MW#3, located directly downgradient of the most highly contaminated floor drain (FD#2), has consistently shown the highest levels of PCE;
- Data from the vertical profile sampling conducted on October 4, 2000 showed that, although 7 of 9 samples exceeded the groundwater standard (5 ppb), only one sample exceeded 100 ppb PCE - the shallow (36 feet to 40 feet) sample from boring GW#2 (adjacent to MW#3) had PCE levels of 3,700 ppb;
- Sampling rounds conducted between March 1999 and July 2001 showed very high levels of PCE. In particular, levels in MW#3 ranged between 16,000 ppb and 23,000 ppb;
- Levels of PCE in all three monitoring wells never exceeded 100 ppb from samples collected subsequent to the July 18, 2001 sampling round.

### **Indoor Air**

While no indoor air samples were conducted by the responsible party as part of this Remedial Investigation, several indoor air samples were collected by NYSDEC, in conjunction with the NYSDOH and NCDOH, based on concerns that contamination from this site may be impacting indoor air quality in adjacent structures. Table 2 presents a summary of indoor samples collected from 24 different locations during 10 sampling events between February 2001 and the present.

The data shows that samples collected between February 2001 and May 2001 from 10 of the 24 locations had levels of PCE exceeding the NYSDOH guideline for residential properties of  $100\mu\text{g}/\text{m}^3$ .

In June 2001, in response to the elevated levels of PCE detected in adjacent structures, the NYSDEC, with the assistance of the NYSDOH and NCDOH, installed three air filtration units at the three indoor locations exhibiting the highest PCE levels (Figure 5). Further, in June 2001, the responsible party installed a soil vapor extraction (SVE) system at 123 Post Avenue (see Section 5.2) to address this indoor air problem as well as remediate on-site contaminated soils which are present beneath the dry cleaners. As a result of

these interim remedial actions, no indoor air exceedances had been identified since the May 2001 sampling round, until December 2002. This recent exceedance was remedied by adjusting the SVE system. Samples collected in January 2003 again showed levels well below the NYSDOH guideline value.

## **5.2: Interim Remedial Measures**

An interim remedial measure (IRM) is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the RI/FS.

An IRM was conducted as part of the Remedial Investigation to address elevated levels of PCE in buildings to the north and northwest of 123 Post Avenue. The NYSDEC became aware of this indoor air problem when, in February 2001, the NYSDOH, with assistance from the NCDOH, conducted routine indoor air sampling in building structures which could potentially be impacted by soil and groundwater contamination identified at 123 Post Avenue. This sampling revealed indoor air impacts at levels exceeding the NYSDOH guideline for residential properties of  $100 \mu\text{g}/\text{m}^3$ . Once the indoor air problem was identified, the NYSDEC asked the responsible party to install an SVE system to address contaminated soils beneath the dry cleaner. An SVE system is an effective means of remediating contaminated soils, as well as mitigating the uncontrolled migration of contaminated vapors away from a source area.

Because the NYSDEC considered 123 Post Avenue to be the source of the indoor air impacts, SVE was proposed as an IRM to address this immediate health threat (see Section 5.3). In June 2001, while the SVE system was being constructed, NYSDEC, with assistance from NYSDOH and NCDOH, installed three air filtration units at the three indoor locations exhibiting the highest PCE levels (Figure 5). These units are designed to capture contaminated vapors in an enclosed area by recirculating air through a carbon filter.

In June 2001, shortly following the installation of the air filtration units, the responsible party completed the installation and initiated operation of the SVE system (Figure 6). An SVE system includes the installation of one or more vapor extraction wells installed above the watertable with a screened interval within the zone of contamination. Piping connects the wells to a treatment building where a vacuum would be applied to the system to draw air contaminated by VOCs, primarily PCE in this case, from the subsurface soils. The contaminated air is treated with a granular activated carbon system before release. The system at 123 Post Avenue included the installation of four soil vapor extraction wells (RW#1S, RW#2S, RW#3S and RW#4S). Two wells were installed upgradient of the dry cleaner and 2 wells downgradient. The locations were selected to optimize the recovery of VOCs in contaminated soil and mitigate the impacts to nearby structures. Several vapor monitoring points (P1, P2, P3, P4, P5 and P6) were installed to assist in the design of the SVE system by determining the radius of contaminant recovery of the SVE wells. The dashed circles presented on Figure 6 outline the predicted vapor recovery area.

Immediately following the startup of these systems, indoor levels of PCE dropped below NYSDOH guidelines. The SVE system is regularly being monitored and adjusted to maintain these low levels. By November 2001, the three air filtration units were shut down because they were no longer providing added benefit with the SVE system in operation.

Beginning in November 2002, due to low contaminant recovery, the SVE system was switched from a continuous operational mode to a pulsed mode. Pulsed pumping is a technique employed when contaminant removal rates reach such low levels that continuous operation is no longer an effective means of contaminant recovery. The SVE system at 123 Post Avenue began with a 1-month pulse cycle. Indoor air quality will be monitored at the end of each off- cycle to monitor any rebound effects and determine the duration of subsequent pulse cycles. Pulse pumping will continue until contaminant recovery has dropped to insignificant levels and post remediation sampling of soils indicates that PCE concentrations in soils are at or below Recommended Soil Cleanup Objectives (RSCO) as identified in TAGM 4046. If monitoring determines that cycling of the SVE system is causing adverse effects on indoor air quality, continuous pumping will be resumed.

At the end of the first 1-month shutdown cycle of the pulse-pumping phase (November 15, 2002 to December 18, 2002), air samples revealed a rebound in indoor contamination levels. Because levels increased to levels exceeding NYSDOH guidance values, continuous pumping resumed. Another round of samples collected on January 7, 2003 showed indoor air values dropping significantly to their previous low levels.

In addition to the SVE system, the responsible party was asked to design an air sparging (AS) system to remediate on-site groundwater. The RP completed the design of an AS system in August 2002, but the groundwater contaminant concentrations had dropped so significantly that implementation of AS was not needed. The AS design will be kept as a contingency if groundwater contaminant concentrations rebound.

### **5.3: Summary of Human Exposure Pathways:**

This section describes the types of human exposures that may present added health risks to persons at or around the site. A more detailed discussion of the human exposure pathways can be found in Section 5.0 of the RI report.

An exposure pathway describes the means by which an individual may be exposed to contaminants originating from a site. An exposure pathway has five elements: [1] a contaminant source, [2] contaminant release and transport mechanisms, [3] a point of exposure, [4] a route of exposure, and [5] a receptor population.

The source of contamination is the location where contaminants were released to the environment (any waste disposal area or point of discharge). Contaminant release and transport mechanisms carry contaminants from the source to a point where people may be exposed. The exposure point is a location where actual or potential human contact with a contaminated medium may occur. The route of exposure is the manner in which a contaminant actually enters or contacts the body (e.g., ingestion, inhalation, or direct contact). The receptor population is the people who are, or may be, exposed to contaminants at a point of exposure.

An exposure pathway is complete when all five elements of an exposure pathway exist. An exposure pathway is considered a potential pathway when one or more of the elements currently does not exist, but could in the future.

The only complete exposure pathway identified at OU-1 of the 123 Post Avenue Site has been the inhalation of contaminated vapors in indoor air. Before the SVE system was installed, PCE-contaminated soil vapor from the site migrated into homes and businesses near the site, where people were exposed by breathing the contaminated air. PCE concentrations were above the NYSDOH guideline of 100  $\mu\text{g}/\text{m}^3$  in a number of locations; the highest detected concentration was 7,400  $\mu\text{g}/\text{m}^3$ . With the SVE system operating, PCE concentrations in indoor air have been well below the guideline. The system is expected to remediate the source of the vapors, permanently eliminating this exposure pathway. Other potential exposure pathways include various routes of exposure to contaminated soil and groundwater at the site. These pathways are currently incomplete because there is no exposure point at which people may come in contact with the contamination.

Inadvertent exposure to soil contamination is not likely because the contaminated soil is below ground surface, beneath pavement and the on-site building. However, activities requiring excavation could result in exposures until the SVE system has remediated the soil contamination.

Currently, concentrations of PCE in on-site groundwater are near or slightly above groundwater standards. Historically, the concentrations were much higher, but it is unlikely that people were exposed to contaminated groundwater within OU-1 because there are no on-site supply wells and the water table is about 35 feet below the ground surface. The Westbury Water District supplies drinking water for the site and surrounding area. The public water supply is routinely monitored and treated, if necessary, to ensure that it complies with federal and state drinking water standards.

#### **5.4: Summary of Environmental Impacts**

This section summarizes the existing and potential future environmental impacts presented by the site. Environmental impacts include existing and potential future exposure pathways to fish and wildlife receptors, as well as damage to natural resources such as aquifers and wetlands.

Site contamination has impacted the groundwater resource in the Upper Glacial aquifer. There is no evidence to suggest that the underlying Magothy aquifer, a sole source or principal/primary aquifer on Long Island and a source of drinking water in the site area, has been impacted by contamination from 123 Post Avenue.

### **SECTION 6: SUMMARY OF THE REMEDIAL GOALS AND SELECTED REMEDY**

Goals for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375-1.10. At a minimum, the remedy selected must eliminate or mitigate all significant threats to public health and/or the environment presented by the hazardous waste disposed at the site through the proper application of scientific and engineering principles.

Prior to the completion of the IRM described in Section 5.2, the remediation goals for this site were to eliminate or reduce to the extent practicable:

- exposures of persons to PCE which has impacted indoor air through volatilization from on-site subsurface soil and groundwater contamination; and
- the release of contaminants from on-site soils into on-site and off-site groundwater that may create exceedances of groundwater quality standards.

Further, the remediation goals for the site include attaining to the extent practicable:

- ambient groundwater quality standards for impacted on-site groundwater; and
- Recommended Soil Cleanup Objectives for contaminated on-site soils.

The NYSDEC believes that the IRM has accomplished these remediation goals provided that it continues to be operated and maintained in a manner consistent with the design.

Based on the results of the investigations at the site, the IRM that has been performed, and the evaluation discussed below, the NYSDEC has selected No Further Action with continued operation of the SVE system as the preferred alternative for the site.

The basis for this selection is the NYSDEC's conclusion that No Further Action with continued operation of the SVE system will be protective of human health and the environment and will meet all SCGs. Overall protectiveness is achieved through meeting the remediation goals listed above.

The IRM has achieved these goals through reduction of PCE levels in on-site subsurface soils. Reduced levels in soils has mitigated the off-site movement of contaminated soil vapors which previously impacted nearby residential and commercial structures at levels exceeding NYSDOH guidelines. Further, levels of PCE in on-site groundwater dropped to levels near or below drinking water standards. As a result, the site is no longer considered a source for off-site impacts.

The main SCGs applicable to this project are as follows:

- Groundwater and drinking water SCGs are based on NYSDEC "Ambient Water Quality Standards and Guidance Values" and Part 5 of the New York State Sanitary Code. These SCGs have almost been achieved onsite. As a contingency, the approved AS design will be implemented if groundwater contaminant concentrations rebound.
- Soil SCGs are based on the NYSDEC "Technical and Administrative Guidance Memorandum (TAGM) 4046; Determination of Soil Cleanup Objectives and Cleanup Levels". Site-specific cleanup levels, using TAGM 4046, were established to define shut-off criteria for the soil vapor extraction (SVE) system which currently operates to remediate on-site soil contamination. Soils samples in the source area will be taken before complete shutdown of the SVE system to confirm that soil SCGs have been met.

- Indoor air SCGs are represented by typical background levels for PCE in residential structures. The SVE system will continue to operate until these SCGs are met.

Therefore, the NYSDEC concludes that the following elements of the IRM already completed have achieved the remediation goals for the site and that No Further Action is needed other than OM&M and the institutional and engineering controls listed below:

1. Continued operation of the SVE system to reduce PCE contaminant levels in on-site subsurface soils, eliminating the source for further groundwater impacts and controlling the migration of PCE vapors to nearby residential and commercial structures.
2. Continued monitoring of the groundwater and indoor air quality.
3. Institutional controls will be imposed in the form of existing use and development restrictions, preventing the use of groundwater as a source of potable or process water without necessary water quality treatment as determined by the NCDOH.
4. The operation of the components of the remedy will continue until the remedial objectives have been achieved, or until the NYSDEC determines that continued operation is technically impracticable or not feasible.
5. As a contingency, the approved AS design will be implemented if groundwater contaminant concentrations rebound.
6. The property owner will complete and submit to the NYSDEC an annual certification until the NYSDEC notifies the property owner in writing that this certification is no longer needed. This submittal will contain certification that the institutional controls put in place, pursuant to the Record of Decision, are still in place, have not been altered, and are still effective.

## **SECTION 7: HIGHLIGHTS OF COMMUNITY PARTICIPATION**

As part of the remedial investigation process, a number of Citizen Participation activities were undertaken to inform and educate the public about conditions at the site and the potential remedial alternatives. The following public participation activities were conducted for the site:

- Repositories for documents pertaining to the site were established.
- A public contact list, which included nearby property owners, elected officials, local media and other interested parties, was established.
- A fact sheet was issued in January 2001, at the onset of the study, which summarized the site work plan for Operable Units 1 and 2.

- A public meeting was held on February 6, 2001 to present a summary of the site work plan for Operable Units 1 and 2.
- A public meeting was held on March 11, 2003 to present and receive comment on the PRAP.
- A responsiveness summary (Appendix A) was prepared to address the comments received during the public comment period for the PRAP.

In general, the public comments received were supportive of the selected remedy.

**TABLE 1**

**Nature and Extent of Contamination**

Soil samples of floor drains collected in July 1995 prior to excavation

<b>SUBSURFACE SOIL</b>	<b>Contaminants of Concern</b>	<b>Concentration Range Detected (ppm)<sup>a</sup></b>	<b>SCG<sup>b</sup> (ppm)<sup>a</sup></b>	<b>Frequency of Exceeding SCG</b>
<b>Volatile Organic Compounds (VOCs)</b>	perchloroethene	up to 5,800	1.4	unknown
	trichloroethene	ND	0.7	0
	cis-1,2-dichloroethene	ND	0.3	0

Soil samples of floor drains collected in August 1998 following soil excavation\*

<b>SUBSURFACE SOIL</b>	<b>Contaminants of Concern</b>	<b>Concentration Range Detected (ppm)<sup>a</sup></b>	<b>SCG<sup>b</sup> (ppm)<sup>a</sup></b>	<b>Frequency of Exceeding SCG</b>
<b>Volatile Organic Compounds (VOCs)</b>	perchloroethene	< 1 to 270	1.4	1 of 4
	trichloroethene	ND	0.7	0 of 4
	cis-1,2-dichloroethene	ND	0.3	0 of 4

\* Samples collected at 4 depths (10'-11', 20'-22', 30'-32' and 36'-40'). Only samples to exceed 1 ppm PCE were collected at shallowest sampling depth, 10'-11'.

Soil samples of sanitary system collected in October 2000\*

<b>SUBSURFACE SOIL</b>	<b>Contaminants of Concern</b>	<b>Concentration Range Detected (ppm)<sup>a</sup></b>	<b>SCG<sup>b</sup> (ppm)<sup>a</sup></b>	<b>SUBSURFACE SOIL</b>
<b>Volatile Organic Compounds (VOCs)</b>	perchloroethene	ND	1.4	0 of 12
	trichloroethene	ND	0.7	0 of 12
	cis-1,2-dichloroethene	ND	0.3	0 of 12

\*Samples collected at 3 depths (16'-20', 20'-24' and 30'-34') from 4 locations.

Direct Push samples collected from GW-1, GW-2 and GW-3 on October 4, 2000\*

<b>GROUNDWATER</b>	<b>Contaminants of Concern</b>	<b>Concentration Range Detected (ppb)<sup>a</sup></b>	<b>SCG<sup>b</sup> (ppb)<sup>a</sup></b>	<b>Frequency of Exceeding SCG</b>
<b>Volatile Organic Compounds (VOCs)</b>	perchloroethene	4 to 3,700	5	7 of 9
	trichloroethene	ND to 4	5	0 of 9
	cis-1,2-dichloroethene	ND to 8	5	1 of 9

Groundwater samples collected from MW-1, MW-2 and MW-3 on March 31, 1999

<b>GROUNDWATER</b>	<b>Contaminants of Concern</b>	<b>Concentration Range Detected (ppb)<sup>a</sup></b>	<b>SCG<sup>b</sup> (ppb)<sup>a</sup></b>	<b>Frequency of Exceeding SCG</b>
<b>Volatile Organic Compounds (VOCs)</b>	perchloroethene	95 to 20,000	5	3 of 3
	trichloroethene	<1 to 11	5	1 of 3
	cis-1,2-dichloroethene	2 to 98	5	2 of 3

Groundwater samples collected from MW-1, MW-2 and MW-3 on October 3, 2000

<b>GROUNDWATER</b>	<b>Contaminants of Concern</b>	<b>Concentration Range Detected (ppb)<sup>a</sup></b>	<b>SCG<sup>b</sup> (ppb)<sup>a</sup></b>	<b>Frequency of Exceeding SCG</b>
<b>Volatile Organic Compounds (VOCs)</b>	perchloroethene	1,200 to 16,000	5	3 of 3
	trichloroethene	ND	5	0 of 3
	cis-1,2-dichloroethene	ND	5	0 of 3

Groundwater samples collected from MW-1, MW-2 and MW-3 on July 18, 2001

<b>GROUNDWATER</b>	<b>Contaminants of Concern</b>	<b>Concentration Range Detected (ppb)<sup>a</sup></b>	<b>SCG<sup>b</sup> (ppb)<sup>a</sup></b>	<b>Frequency of Exceeding SCG</b>
<b>Volatile Organic Compounds (VOCs)</b>	perchloroethene	90 to 23,000	5	3 of 3
	trichloroethene	3 to 11	5	1 of 3
	cis-1,2-dichloroethene	ND to 65	5	1 of 3

Groundwater samples collected from MW-1, MW-2 and MW-3 on October 31, 2001

<b>GROUNDWATER</b>	<b>Contaminants of Concern</b>	<b>Concentration Range Detected (ppb)<sup>a</sup></b>	<b>SCG<sup>b</sup> (ppb)<sup>a</sup></b>	<b>Frequency of Exceeding SCG</b>
<b>Volatile Organic Compounds (VOCs)</b>	perchloroethene	24 to 86	5	3 of 3
	trichloroethene	ND	5	0 of 3
	cis-1,2-dichloroethene	ND	5	0 fo 3

Groundwater samples collected from MW-1, MW-2 and MW-3 on June 27, 2002

<b>GROUNDWATER</b>	<b>Contaminants of Concern</b>	<b>Concentration Range Detected (ppb)<sup>a</sup></b>	<b>SCG<sup>b</sup> (ppb)<sup>a</sup></b>	<b>Frequency of Exceeding SCG</b>
<b>Volatile Organic Compounds (VOCs)</b>	perchloroethene	4 to 8	5	2 of 3
	trichloroethene	ND	5	0 of 3
	cis-1,2-dichloroethene	ND	5	0 of 3

Groundwater samples collected from MW-1, MW-2 and MW-3 on September 27, 2002

<b>GROUNDWATER</b>	<b>Contaminants of Concern</b>	<b>Concentration Range Detected (ppb)<sup>a</sup></b>	<b>SCG<sup>b</sup> (ppb)<sup>a</sup></b>	<b>Frequency of Exceeding SCG</b>
<b>Volatile Organic Compounds (VOCs)</b>	perchloroethene	10 to 38	5	3 of 3
	trichloroethene	ND	5	0 of 3
	cis-1,2-dichloroethene	ND to 1	5	0 of 3

Indoor air samples collected between February 2001 and September 2002

<b>AIR</b>	<b>Contaminants of Concern</b>	<b>Concentration Range Detected (<math>\mu\text{g}/\text{m}^3</math>)<sup>a</sup></b>	<b>SCG<sup>b</sup> (<math>\mu\text{g}/\text{m}^3</math>)<sup>a</sup></b>	<b>Frequency of Exceeding SCG</b>
<b>Volatile Organic Compounds (VOCs)</b>	perchloroethene	ND to 7,400	100	18 of 81

\*Groundwater samples using the direct push method were collected from 3 depths (36'-40', 56'-60' and 76'-80') at three locations (GW-1, GW-2 and GW-3).

<sup>a</sup> ppb = parts per billion, which is equivalent to micrograms per liter,  $\mu\text{g/L}$ , in water;  
ppm = parts per million, which is equivalent to milligrams per kilogram,  $\text{mg/kg}$ , in soil;  
 $\mu\text{g/m}^3$  = micrograms per cubic meter

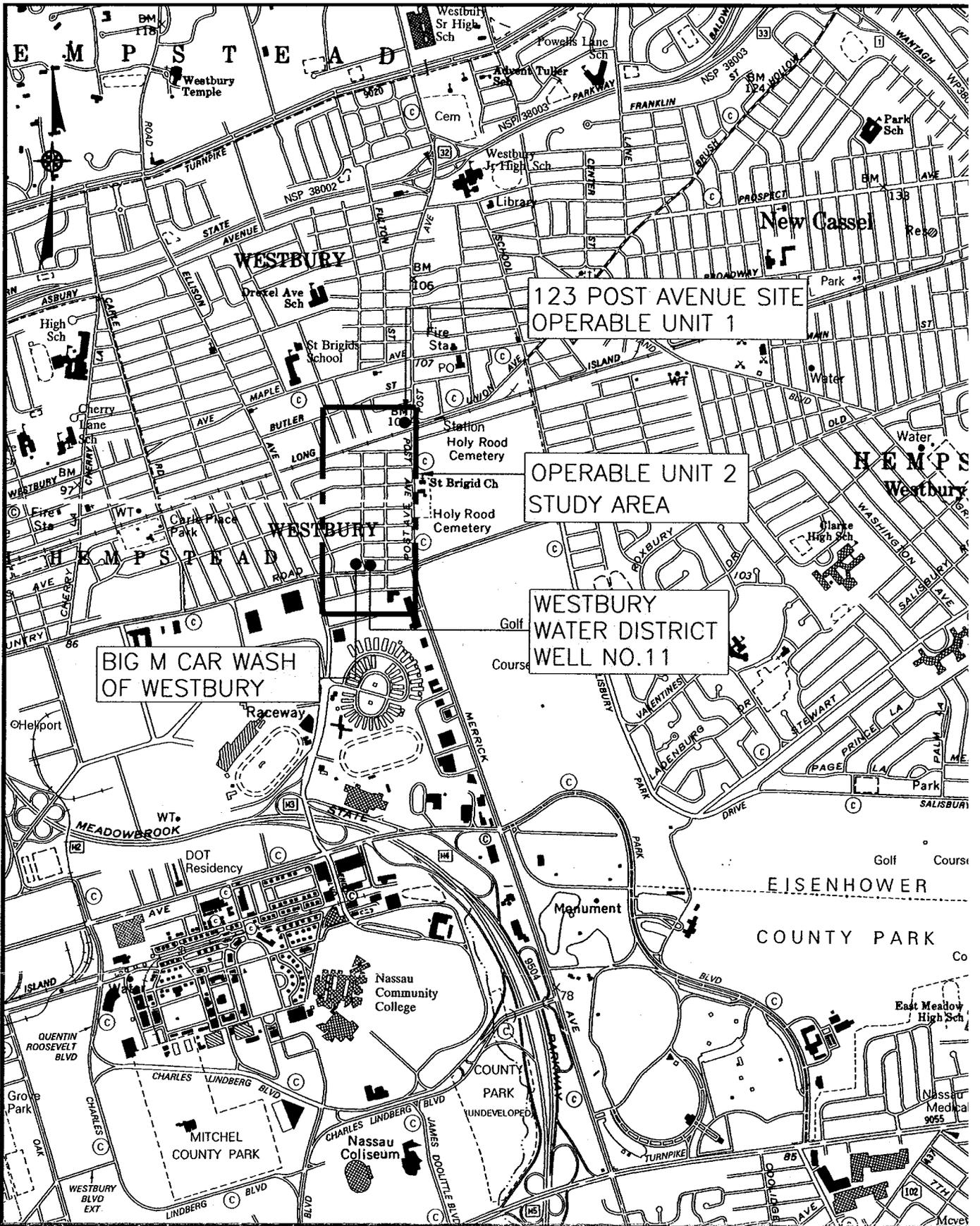
<sup>b</sup> SCG = standards, criteria, and guidance values;  
ND = non detect

TABLE 2

SUMMARY OF TETRACHLOROETHENE CONCENTRATIONS IN AIR SAMPLES  
123 POST AVENUE SITE (NO. 1-30-088)

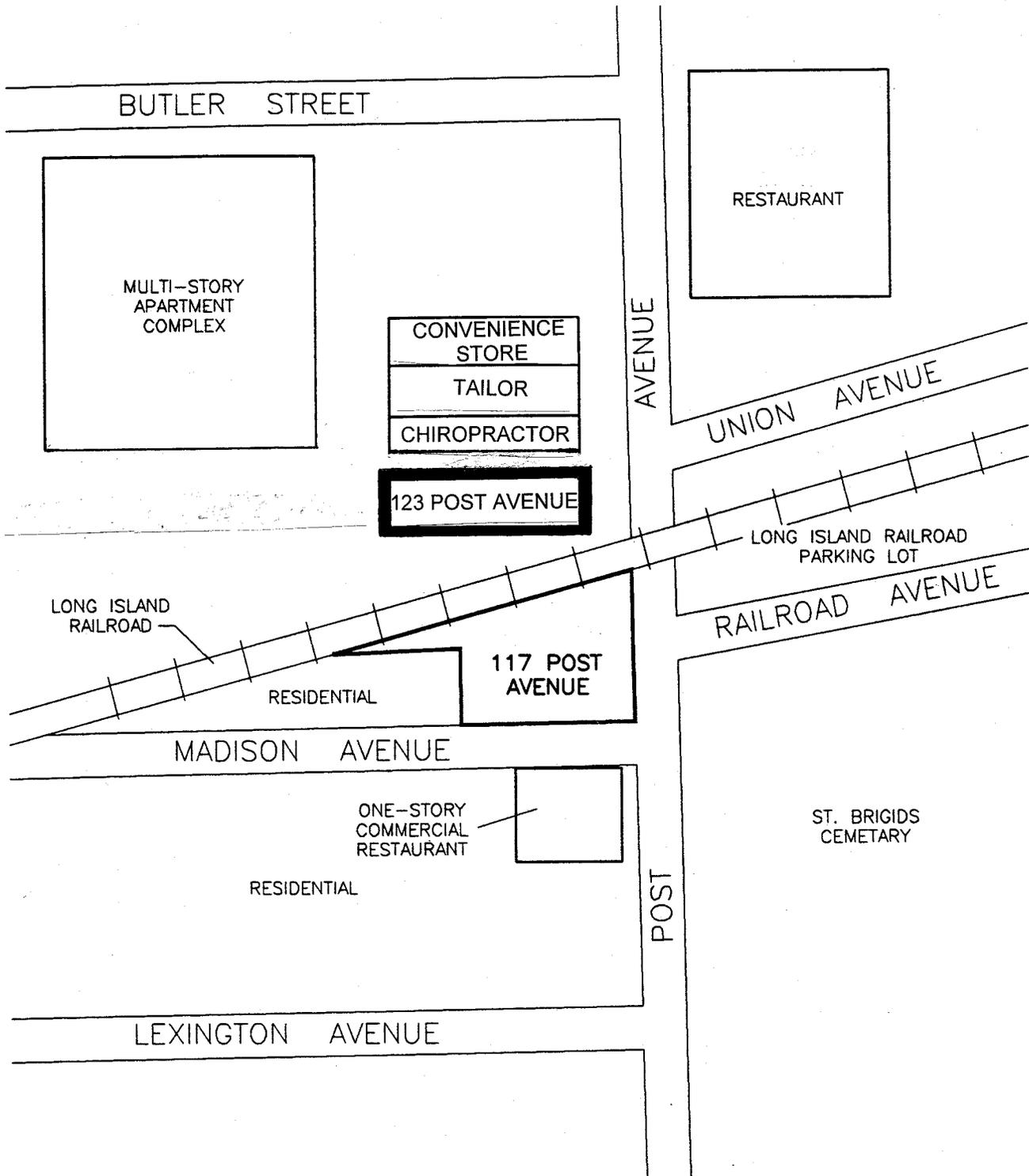
Sampling location	02/20-21/2001	3/27-28/2001	4/18-19/2001	5/16-17/2001	6/27-28/2001	9/10-11/2001	11/29-30/2001	3/19-20/2002	6/12-14/2002	9/17-18/2002	12/17-18/2002	01/07-08-2003
<b>Chiropractic Center 125 Post Ave</b>												
1st Floor Waiting Room	1,520 and 1,580	NS	NS	192	44	NS	NS	5 and 5	14 and 14*	22 and 23 *	6.6 and 6.2 *	NS
1st Floor Rear Office	1,770	NS	NS	192	50	NS	NS	5	NS	NS	NS	NS
<b>Convenience Store 128 Post Ave</b>												
1st Floor Counter Area	400	NS	NS	NS	14	NS	7	5 [PL]	7	13	<0.7	NS
Rear of Store	NS	NS	NS	45.3	NS	NS	NS	NS	NS	NS	NS	NS
Common Basement	1,900 and 1,930	NS	NS	831 and 1,020	86 and 96	NS	15 and 16	5 and 8 [SU]	20	41	6.9	NS
<b>Tailor 127 Post Ave</b>												
1st Floor Work Room	NS	1540	NS	203	NS	NS	NS	NS	NS	NS	NS	NS
1st Floor Near Counter	NS	NS	NS	NS	51	NS	10	7	20	23	32	NS
<b>Condominiums 135 Post Ave</b>												
1st Floor - Manager's Office	NS	500	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
1st Floor Workshop	NS	NS	29.3	3.2	NS	NS	NS	NS	NS	NS	NS	NS
1st Floor - Hall Outside Supt's A	NS	NS	664	NS	NS	NS	8	NS	NS	NS	NS	NS
Boiler Room, South Wing	NS	< 5	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
1st Floor Lobby	NS	95	NS	61.6	5 [PL]	NS	16	8	2	3.6	18	NS
6th Floor Stairwell Landing	NS	NS	NS	93.6	5 [PL]	NS	9	5 [PL]	NS	NS	NS	NS
Hallway outside Apt. 3R	NS	NS	NS	66.4	5 [PL]	NS	5	5 [PL]	NS	NS	NS	NS
Apt. 2R - Living Room	NS	NS	NS	5.1	NS	NS	NS	NS	NS	NS	NS	NS
1st Floor Meter Room	NS	NS	NS	6.3 and 5.4	NS	NS	NS	NS	NS	NS	NS	NS
<b>Residence 135 Post Ave</b>												
1st Floor - Supt's Living Room	NS	7,300	7,400	464	12	10	NS	9 and 10	5 and 6*	25 and 22*	349 and 356*	5
1st Floor - Daughter's Bedroom	NS	NS	NS	233	NS	12	NS	NS	NS	NS	NS	NS
1st Floor - Supt's Master Bedroo	NS	NS	4,800	NS	17	12	NS	12	7	24	441	7
1st Floor - 3rd (Far) Bedroom	NS	NS	NS	NS	11	NS	NS	9	7	20	210	5
<b>Residence 125A Post Ave</b>												
2nd Floor Kitchen	NS	750	NS	98.8	7	NS	NS	NS	NS	NS	NS	NS
<b>Residence 125B Post Ave</b>												
2nd Floor Bedroom	NS	700	NS	NS	18	NS	NS	NS	14	NS	NS	NS
<b>Residence 125A Post Ave</b>												
2nd Floor Living Room	NS	NS	NS	NS	NS	NS	NS	NS	NS	7.7	6.6	NS
Outdoor sample	15	15 and 16	NS	1.4	5 [PL]	NS	5 [PL]	5 [PL]	3	4.5	<0.7	5 [PL]

Notes: The symbol "<" means "less than." A concentration preceded by this symbol means that the compound was not detected in the sample.  
The [PL] notation indicates that the compound was present in the sample, but at a concentration less than the detection limit.  
The [SU] notation indicates that the reported concentration is suspect.  
\* Duplicate Sample.  
Concentrations in micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ )



123 POST AVENUE REMEDIAL INVESTIGATION—OPERABLE UNIT 1  
WESTBURY, NEW YORK

SITE LOCATION MAP



**LEGEND**

INFORMATION OBTAINED DURING  
SITE WALK COMPLETED ON  
AUGUST 31, 1998

Title:

SITE AND SURROUNDING  
AREA LAND-USE MAP  
123 POST AVENUE  
WESTBURY, NEW YORK

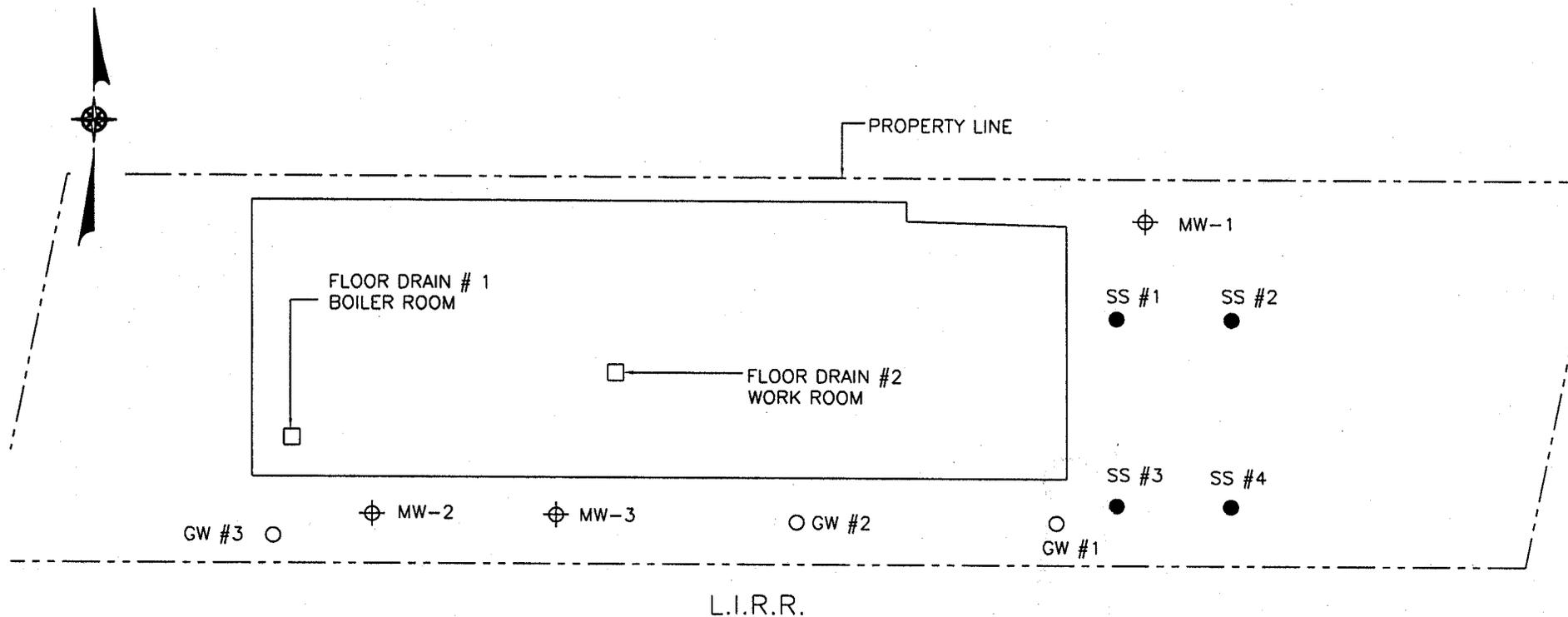
Prepared For:

DL ROTHBERG & ASSOCIATES, P.C.



Compiled by: J.M.	Date: 9/98
Prepared by: R.K.	Scale: NTS
Project Mgr: J.M.	Office: NY

FIGURE  
**2**



**LEGEND**

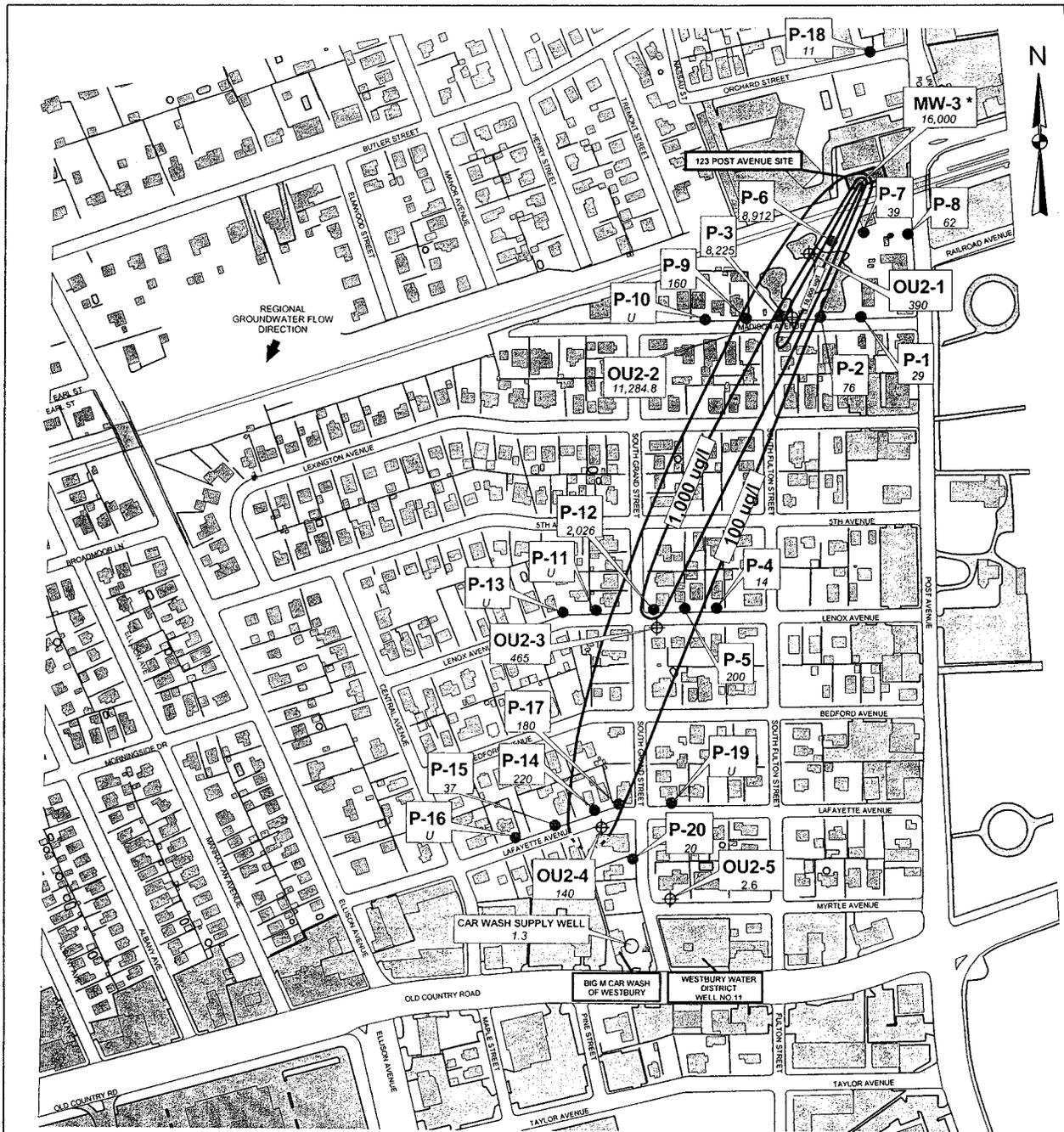
- ⊕ PERMANENT MONITORING WELL
- GROUNDWATER VERTICAL PROFILE BORING (OCTOBER 2000)
- SOIL BORING (OCTOBER 2000)

SOURCE: DECEMBER 2000 REMEDIAL INVESTIGATION REPORT PREPARED BY ANSON ENVIRONMENTAL LTD.

SCALE: 1"=20'

123 POST AVENUE REMEDIAL INVESTIGATION-OPERABLE UNIT 1  
WESTBURY, NEW YORK

**ON-SITE SAMPLE LOCATIONS**



BASEMAP COPYRIGHT, 1993, COUNTY OF NASSAU, NY.

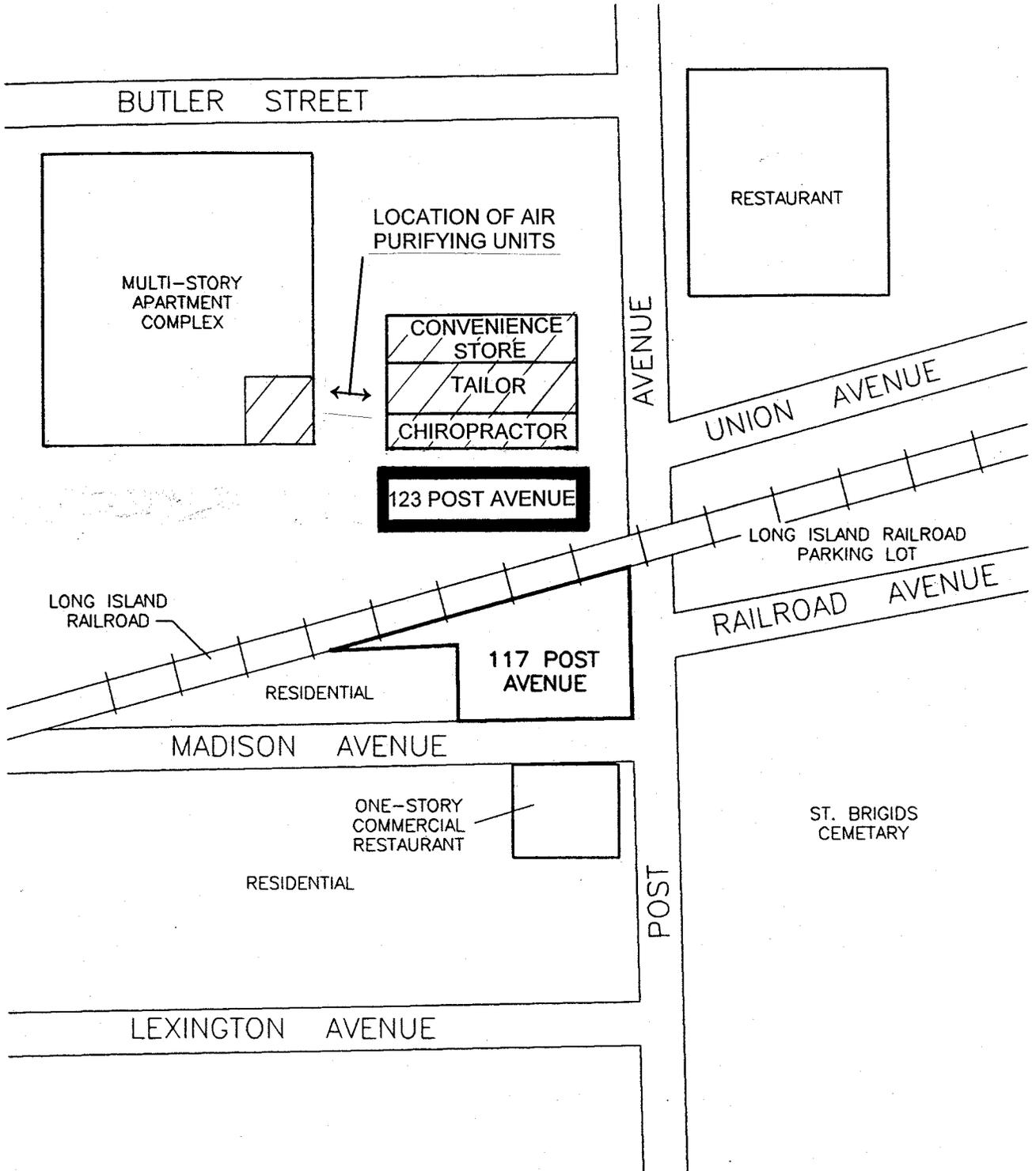
**LEGEND**

- GROUNDWATER PROBE HOLE LOCATION
- OU2-1 ⊕ PERMANENT MONITORING WELL LOCATION AND DESIGNATION
- P-4 PROBE HOLE DESIGNATION
- MAXIMUM TOTAL PCE, TCE AND 1,2-DCE CONCENTRATION (ug/l)
- U UNDETECTED
- \* ON-SITE WELL SAMPLED BY OTHERS ON OCTOBER 3, 2000

200 0 200 Feet

123 POST AVENUE REMEDIAL INVESTIGATION - OPERABLE UNIT 2  
WESTBURY, NEW YORK

**HORIZONTAL EXTENT OF PCE, TCE AND 1,2-DCE  
IN GROUNDWATER**



**LEGEND**

INFORMATION OBTAINED DURING  
SITE WALK COMPLETED ON  
AUGUST 31, 1998



**INDOOR AREAS IMPACTED  
BY PCE CONTAMINATION**

Title:

**SITE AND SURROUNDING  
AREA LAND-USE MAP  
123 POST AVENUE  
WESTBURY, NEW YORK**

Prepared For:

**DL ROTHBERG & ASSOCIATES, P.C.**

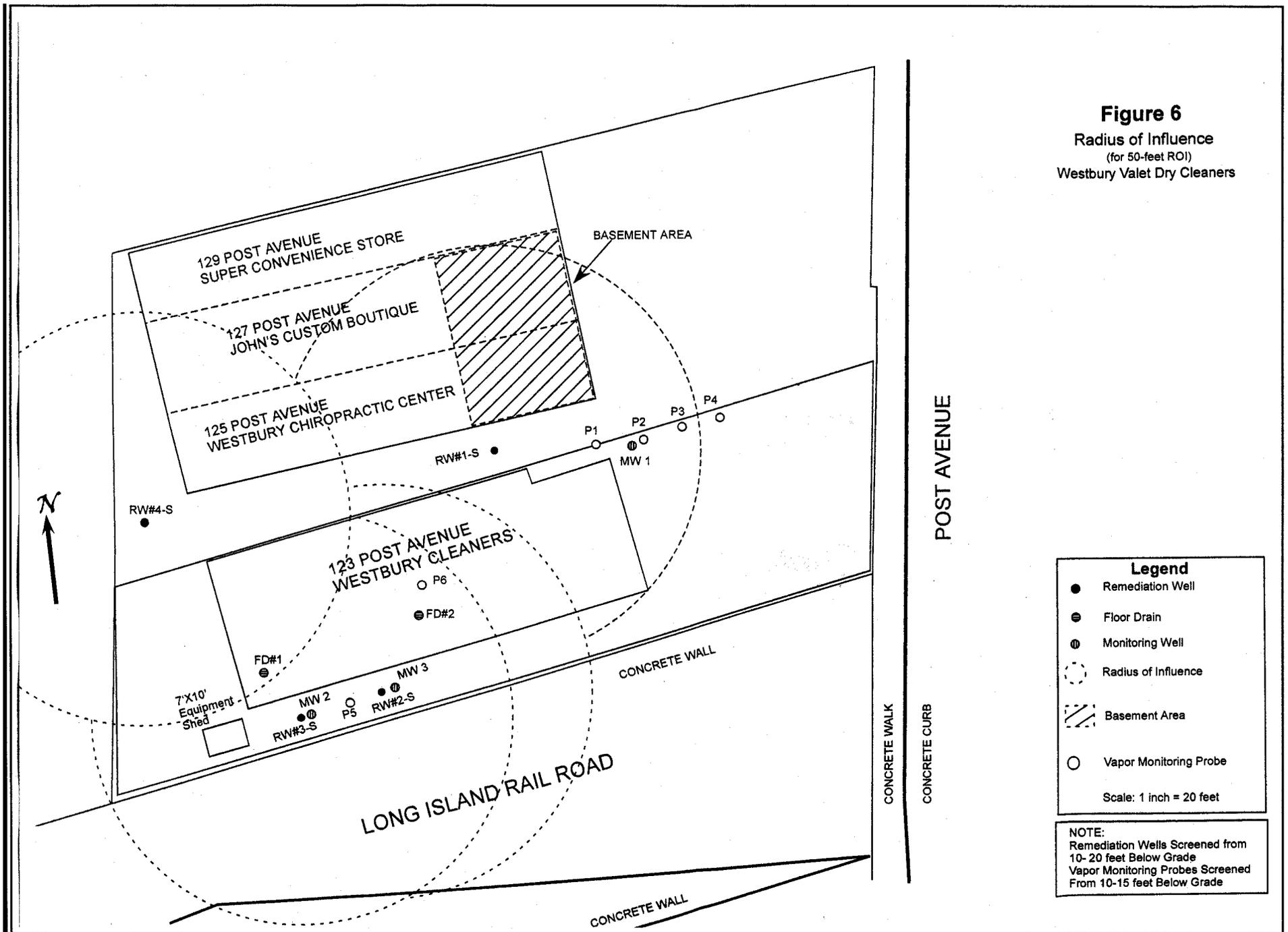
**ROUX**  
ROUX ASSOCIATES, INC.  
*Environmental Consulting*

Compiled by: J.M.	Date: 9/98
Prepared by: R.K.	Scale: NTS
Project Mgr: J.M.	Office: NY

FIGURE

**5**

**Figure 6**  
**Radius of Influence**  
 (for 50-foot ROI)  
**Westbury Valet Dry Cleaners**



# **APPENDIX A**

## **Responsiveness Summary**

# RESPONSIVENESS SUMMARY

**123 Post Avenue Site  
Operable Unit No. 1  
Village of Westbury, New York  
Site No. 1-30-088**

The Proposed Remedial Action Plan (PRAP) for the 123 Post Avenue (OU-1) Site was prepared by the New York State Department of Environmental Conservation (NYSDEC) in consultation with the New York State Department of Health (NYSDOH) and was issued to the document repositories on February 22, 2003. The PRAP outlined the remedial measure proposed for the contaminated soils, groundwater and indoor air at the 123 Post Avenue (OU-1) Site.

The release of the PRAP was announced by sending a notice to the public contact list, informing the public of the opportunity to comment on the proposed remedy.

A public meeting was held on March 11, 2003, which included a presentation of the Remedial Investigation (RI) as well as a discussion of the proposed remedy. The meeting provided an opportunity for citizens to discuss their concerns, ask questions and comment on the proposed remedy. These comments have become part of the Administrative Record for this site. The public comment period for the PRAP ended on March 23, 2003.

This responsiveness summary responds to all questions and comments raised during the public comment period. The following are the comments received, with the NYSDEC's responses:

Comment 1: How deep is the contamination?

Response 1: The onsite groundwater contamination extends from the watertable, at approximately 34 feet, to about 5 to 10 feet below the watertable. Contamination in onsite soils extends from near the ground surface to the water table. See Response 10 for a discussion of off-site contamination.

Comment 2: Were the past problems of PCE going into the floor drains taken care of?

Response 2: Yes, after contaminated soil was removed from beneath the floor drains, the drains were sealed.

Comment 3: Since all of the PCE-contaminated soil was not able to be dug out from beneath the floor drains, are you going to be able to get it out?

Response 3: Yes, the function of the SVE system is to remove the remaining PCE from the soils.

Comment 4: Does any of the contamination remaining in the soil continue to impact the groundwater?

- Response 4: Not likely. Since the SVE system began operating in July 2001, PCE concentrations in groundwater have dropped from levels as high as 23,000 parts per billion (ppb) to current levels of well below 100 ppb.
- Comment 5: The owner must be commended in cooperating with the Department in cleaning up this site.
- Response 5: Comment noted.
- Comment 6: How long does a person have to be exposed to PCE in air to cause a problem?
- Response 6: The health effects of PCE depend on an individual's sensitivity to the chemical, as well as the level and length of exposure. At the 123 Post Avenue site, before the installation of the SVE system, the measured PCE concentrations in the indoor air of the buildings nearest the site generally ranged from 500 to 2,000 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ). The highest level measured was 7,400  $\mu\text{g}/\text{m}^3$ . These concentrations have fallen significantly since the summer of 2001 and now range from less than 5  $\mu\text{g}/\text{m}^3$  to around 30  $\mu\text{g}/\text{m}^3$ . In most places, the concentrations are similar to typical background concentrations found in buildings not known to be affected by chemical spills or other major sources of PCE.
- In humans and animals, the major effects of exposure are on the central nervous system, kidney, liver and possibly the reproductive system. Studies with volunteers show that short-term exposures of 8 hours or less to concentrations of 700,000  $\mu\text{g}/\text{m}^3$  cause central nervous system symptoms such as dizziness, headache, sleepiness, lightheadedness and poor balance. Exposures to 350,000  $\mu\text{g}/\text{m}^3$  for 4 hours affected the nerves of the visual system and reduced scores on certain behavioral tests (which, for example, measure the speed and accuracy of a person's response to something they see on a computer screen). These effects were mild and disappeared soon after exposure ended.
- Studies of dry-cleaning workers indicate that long-term exposure (9-20 years, for example) to workplace air levels averaging about 50,000 to 80,000  $\mu\text{g}/\text{m}^3$  reduces scores on behavioral tests and causes biochemical changes in blood and urine. The biochemical changes indicate liver and kidney damage. The effects were mild and hard to detect. How long the effects would last if exposure ended isn't known.
- There is one study of long-term exposure to air levels similar to those measured near 123 Post Avenue before the installation of the SVE system. The study reported reduced scores on behavioral tests in healthy adults living (for 10.6 years, on average) in apartments near dry-cleaning shops. The effects were small; the average test scores of the residents were slightly lower than that of unexposed people. In this study, the average air level was 5,000  $\mu\text{g}/\text{m}^3$  and the median was 1,400  $\mu\text{g}/\text{m}^3$  (that is, half the measured air levels were above 1,400  $\mu\text{g}/\text{m}^3$  and half were below it).
- Comment 7: By the owners actions, has he protected the workers in the dry cleaners?
- Response 7: The remedial actions taken at the site have most likely reduced the infiltration of contaminated soil vapor, resulting from past disposal practices, into the dry cleaner building, similar to the reduction in vapors observed at the other affected buildings near the site. However, the employees at the dry

cleaner may be exposed to elevated levels of PCE because they work with the chemical. The exposure assessment for the site does not address this exposure because it is not related to the improper disposal of hazardous waste. It is considered an occupational exposure issue and would fall under the Occupational Safety and Health Administration (OSHA) regulations.

Comment 8: Do you have an estimate of the time frame that SVE might have to continue?

Response 8: While the NYSDEC considers most of the PCE in soils to have been removed in the 20 months the system has been in operation, continued operation will be necessary so long as a threat to indoor air is present. In December 2002, the NYSDEC modified the operational program at 123 Post Avenue from a continuous mode to a pulsed mode. Shift to a pulse mode is normally done to improve contaminant recovery efficiency when low levels of contamination remain in the soil. This shift to a pulse mode resulted in an increase in indoor PCE levels to unacceptable levels; however, these levels were much lower than before the SVE system began operating. As such, the SVE system was immediately shifted back to continuous operation. It is difficult to predict how long this system will have to operate so that the remaining contamination no longer poses a threat; it could be a few months or a few years.

Comment 9: Is there another chemical that could be used by dry cleaners besides PCE?

Response 9: There are a number of viable alternatives which are in limited use in the cleaning industry: a silicone-based solvent which is used in modified dry-cleaning machines; liquid carbon dioxide (CO<sub>2</sub>) used in high-pressure cleaning machines; "wet cleaning" with plain water in computer-controlled washing machines, petroleum distillates and various detergents.

Comment 10: Is there a groundwater plume which extends from the site to Lafayette Avenue, south of the site?

Response 10: Yes. Impacts to the groundwater are the subject of a State-funded remedial investigation, the second of two operable units being evaluated for 123 Post Avenue. A groundwater plume has been found to extend south from the site for about 2000 feet, moving with the flow of groundwater. In addition, the plume deepens with distance from the site to a depth of about 120 feet below ground surface at its southern extent. The width of the portion of the plume which exceeds 100 ppb PCE is approximately 200 feet.

Comment 11: Does the plume affect any of the Westbury water supply wells?

Response 11: The Westbury Water District # 11 well is located 2000 feet directly downgradient (south) of the dry cleaner. There are very low levels of contamination in this well (below NYS drinking water standards), but it is likely that most, if not all, of this contamination is unrelated to 123 Post Avenue because it shows a unique contaminant signature which suggests a source other than a dry cleaner. Further, this well pumps water from a different and much deeper geologic formation (Magothy Formation) than the aquifer impacted at the site (Upper Glacial aquifer). The Westbury Water District is required to monitor this water on a regular basis to insure that it conforms with applicable drinking water standards.

Comment 12: Is there any issue with indoor air for the offsite houses?

Response 12: The NYSDEC believes there is very little risk of impacts to indoor air at residences in the vicinity of the site. Soil gas tests conducted in shallow soils on the southern portion of the 117 Post Ave property, tests which would indicate the potential for impacts to nearby structures, showed very slight or no PCE concentrations. Further, as the PCE plume moves deeper into the aquifer, the clean water above the plume acts as a barrier, limiting upward movement of this contamination into the shallow soils. For these reasons, residences south of the site which overlie the plume are unlikely to be impacted by contamination from the site.

Comment 13: Do you have a time frame for the offsite plume to be remediated?

Response 13: The NYSDEC is currently evaluating remedial technologies to treat the contamination in the offsite plume and expects to present a Proposed Remedial Action Plan for Operable Unit # 2 in early 2004. Shortly after a Record of Decision is approved, the Department will begin implementing the remedial actions set forth in this document.

# **APPENDIX B**

## **Administrative Record**

# **Administrative Record**

**123 Post Avenue Site  
Operable Unit No. 1  
Village of Westbury, New York  
Site No. 1-30-088**

1. Proposed Remedial Action Plan for the 123 Post Avenue Site, Operable Unit No. 1, dated February 2003, prepared by the NYSDEC.
2. Order on Consent, Index No. W1-0860-99-13 between NYSDEC and Choe Realty, LLC, executed on September 25, 2000.
3. Plan for Pulse Pumping the Soil Vapor Extraction System, Operable Unit 1, Soil and Groundwater Onsite, Westbury Valet Dry Cleaners, 123 Post Avenue, Westbury, New York, September 5, 2002. Prepared for Choe Realty, LLC and the New York State Department of Environmental Conservation by Anson Environmental Ltd.
4. Remedial Investigation/Feasibility Study Work Plan, Westbury Valet Dry Cleaners, Operable Unit 1, Soil and Groundwater Onsite, 123 Post Avenue, Westbury, New York, August 30, 2000. Prepared for Choe Realty, LLC and the New York State Department of Environmental Conservation by Anson Environmental Ltd.
5. Interim Remedial Measure Work Plan, Westbury Valet Cleaners, 123 Post Avenue, Westbury, New York, Operable Unit 1, On-Site Remediation, April 26, 2001. Prepared for Choe Realty, LLC and the New York State Department of Environmental Conservation by Anson Environmental Ltd.
6. Remedial Investigation Report, Westbury Valet Dry Cleaners, Operable Unit 1, Soil and Groundwater Onsite, 123 Post Avenue, Westbury, New York, January 30, 2003. Prepared for Choe Realty, LLC and the New York State Department of Environmental Conservation by Anson Environmental Ltd.
7. Plan for Air Sparge System, Operable Unit 1, Soil and Groundwater Onsite, Westbury Valet Dry Cleaners, 123 Post Avenue, Westbury, New York, September 12, 2002. Prepared for Choe Realty, LLC and the New York State Department of Environmental Conservation by Anson Environmental Ltd.
8. Environmental Investigation of Class V Well, Westbury Valet Cleaners, 123 Post Avenue, Westbury, New York, November 24, 1999. Prepared for Choe Realty, LLC by Anson Environmental Ltd.
9. Phase I Environmental Site Assessment, 117 Post Avenue, Westbury, New York, September 16, 1998. Prepared for Westbury Senior Living, LLC by Roux Associates, Inc.
10. Results of Phase II Investigation, 117 Post Avenue, Westbury, New York, November 17, 1998. Prepared for Westbury Senior Living, LLC by Roux Associates, Inc.
11. Plans and Specifications, Passive Soil Gas Venting System, 117 Post Avenue, Westbury, New York, February 1, 2000. Prepared for Westbury Senior Living, LLC by Remedial Engineering, P.C.

12. Citizen Participation Plan, Westbury Valet Dry Cleaners, Westbury, Nassau County, August 16, 2000. Prepared for Choe Realty, LLC and the New York State Department of Environmental Conservation by Anson Environmental Ltd.
13. Fact Sheet, Proposed Remedial Action Plan, 123 Post Avenue Inactive Hazardous Waste Disposal Site, Operable Unit 1, Site ID # 1-30-088, Village of Westbury, Nassau County, February 2003. Prepared by the New York State Department of Environmental Conservation.
14. Groundwater Investigation, 117 Post Avenue, Village of Westbury, Nassau County, New York, October 1997. Prepared for H.W. 117 Post Corporation by Apex Environmental, Inc.