

Periodic Review Report NYSDEC Site #C828110 December 22, 2022

Location:

Former Alliance Precision Plastics
595 Trabold Road
Gates, New York 14624

Prepared for:

Trabold Road Industrial Center, LLC
259 Alexander Street
Rochester, NY 14607

LaBella Project No. 2230425

December 22, 2022



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1.0 INTRODUCTION

LaBella Associates, D.P.C. (LaBella) is pleased to submit this December 22, 2022 Periodic Review Report (PRR) for the former Alliance Precision Plastics property located at 595 Trabold Road, Town Gates, Monroe County, New York, herein after referred to as the “Site”. The Site is identified as New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) Site #C828110. A Site Location Map is included as Figure 1.

The Site is located in the County of Monroe, New York and is identified as Block 1 and Lot 11 on the Monroe County Tax Map 133.70. The Site consists of one approximately 289,674 square foot manufacturing building, asphalt paved parking lots and driveways and landscaped areas. The Site is zoned Limited Industrial and is currently vacant.

The site is bordered by Little Black Creek to the south, Trabold Road to the east, a municipal garage and light industry to the north, and by the Town of Gates Municipal Landfill No. 15 on the west. The site is approximately 7 acres in size. T

LaBella was retained by Trabold Road Industrial Center, LLC to assist in the monitoring and reporting requirements associated with the Site Management Plan (SMP) prepared for the Site.

2.0 BACKGROUND

The Site was formerly operated by Alliance Precision Plastics. The Site was placed on the NYSDEC Registry of Inactive Hazardous Waste Disposal Sites (the Registry) in 2001 based on the discovery of chlorinated volatile organic compounds (VOCs) in soil and groundwater at the base of the shipping/receiving ramp on the south side of the Site building. The Site was assigned a Classification 3, which means that consequential amounts of hazardous waste were disposed, but not enough to represent a significant threat and that action can be deferred.

Historical operations at the facility included manufacturing compression, transfer, and injection molds as well as production of plastic molded parts. A variety of organic solvents including methylene chloride were used at the facility.

Previous environmental investigations identified soil and groundwater impacted with 1,1,1-Trichloroethane (TCA) and its degradation products (i.e., 1,1-dichloroethene (1,1-DCE) and 1,1-dichloroethane (1,1-DCA)). Volatile organic compounds (VOCs) in groundwater have been limited to monitoring well MW-11 and have not been documented in downgradient wells. Monitoring wells installed during previous investigations are depicted on Figure 2. VOCs have not been detected in stream water samples collected from the adjacent Little Black Creek.

In 2013 LaBella collected additional groundwater samples and completed sub slab vapor sampling at the Site. The results of the groundwater sampling confirmed a localized zone of residual VOCs in groundwater in the southern parking lot (i.e., MW-11). Further, sub slab vapor sampling indicated that accumulation of sub slab vapors is localized proximate the source area.

In May 2015 a sub slab depressurization system (SSDS) was installed at the Site to mitigate the potential for vapor intrusion of a portion of the Site building.



3.0 INSTITUTIONAL AND ENGINEERING CONTROLS (IC/EC)

3.1 IC/EC Certification

IC/EC certifications are provided by a designated representative of Trabold Road Industrial Center, LLC, and a Qualified Environmental Professional in the State of New York working for on behalf of Trabold Road Industrial Center, LLC. Refer to Appendix A for a copy of the certification forms.

3.2 Institutional Controls

The Institutional Controls for the Site are described as follows:

- IC/EC Plan
- Groundwater Use Restriction
- Land use Restriction
- Building Use Restriction
- Soil Management Plan
- Operation & Maintenance (O&M) Plan

Imposition of an institutional control in the form of an environmental easement for the controlled property which will:

1. The property may be used for industrial use;
2. All ECs must be operated and maintained as specified in this SMP;
3. All ECs must be inspected at a frequency and in a manner defined in the SMP.
4. The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH or the Monroe County Department of Health to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department.
5. Data and information pertinent to site management must be reported at the frequency and in a manner as defined in this SMP;
6. All future activities that will disturb remaining contaminated material must be conducted in accordance with this SMP;
7. Operation, maintenance, inspection, and reporting related to any mechanical or physical component of the SSDS shall be performed as defined in this SMP;
8. Access to the site must be provided to agents, employees or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the Deed Restriction.
9. The potential for vapor intrusion must be evaluated for any buildings developed at the Site, and any potential impacts that are identified must be monitored or mitigated; and
10. Vegetable gardens and farming on the site are prohibited.



3.3 Engineering Controls

The Engineering Controls for the Site are described as follows:

- Vapor Mitigation System
 1. A sub-slab depressurization system (SSDS) was installed voluntarily by the owner in the warehouse portion of the building to address potential exposures to vapor intrusion. The SMP refers to the SSDS as an Engineering Control (EC) but the NYSDEC does not consider it to be an EC.

3.4 Deviations

The following deviations occurred during the monitoring and sampling work during this reporting period.

- The inspection of the Site and SSDS was conducted on December 6, 2022, which is after the November 10, 2022 reporting period listed on the ICEC Form.

4.0 ANNUAL MONITORING

The current monitoring program is summarized in the following table:

Monitoring/Inspection Schedule

Monitoring Program	Frequency	Matrix	Status
Site Wide Inspection	Annually	Site Use	Ongoing
SSDS	Annually or as needed	Operation, Condition	Ongoing

A summary of the monitoring work completed is provided below.

4.1 Sub Slab Depressurization System Monitoring

The sub-slab depressurization system was inspected on December 6, 2022 in order to verify proper operation of the system. There is one fan that operate the SSDS at the locations shown on Figure 2. The following inspections were made:

- the in-line U-tube manometer on the suction side of the piping system was observed to determine a pressure differential that would indicate the fan was operating properly.
- the piping condition was observed to determine if any portion of the piping required repair;
- labeling of the system was intact;
- The audible alarm was operations., and,
- descriptions of actions taken to address any concerns of the SSDS (if applicable).

Based on the inspection, the SSDS appeared to be in good working order. Copies of the inspection forms and photographs of pertinent portions of the system are included in Appendix B.



4.2 Site Wide Inspection

A site-wide inspection of the property was conducted on December 6, 2022 to assess the general condition and use of the site . Based on the results of the general site conditions inspection, the site remains vacant and in good condition. Photos of the site are included in Appendix B.

5.0 CONCLUSIONS AND RECOMMENDATIONS

5.1 Compliance

The requirements dictated in the SMP regarding IC/EC's and the Monitoring Plan were generally met during the reporting period. As such, no steps are currently deemed necessary to correct areas of non-compliance.

5.2 Performance and Effectiveness of Remedy

An evaluation of the components of the SMP during this reporting period indicates that the IC/EC controls were protective of human health and the environment. The monitoring plan sufficiently monitored the performance of the remedy.

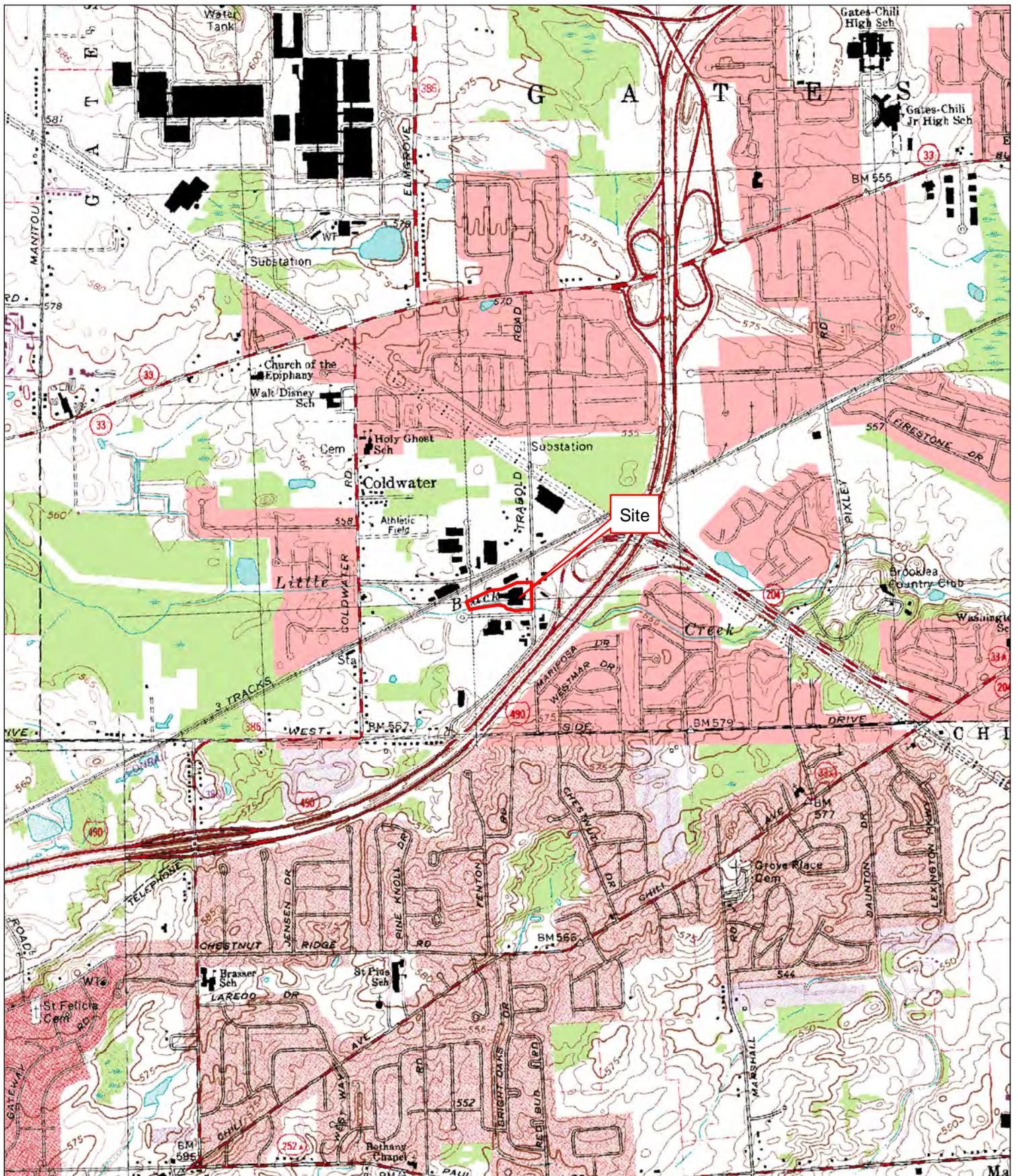
5.3 Recommendations

Since residual contamination remains at the site, applicable site management requirements should be continued.

I:\BUCKINGHAM PROPERTIES\2230425 - 595 TRABOLD RD ANNUAL MONITORING\11_REPORTS\2022 PRR\RPT.2022-12.15.C828110.2022 PRR ALLIANCE PRECISION PLASTICS 595 TRABOLD RD.DOCX



FIGURES



PROJECT/DRAWING NUMBER
2230425
[FIGURE 1]

DRAWING TITLE
SITE LOCATION MAP

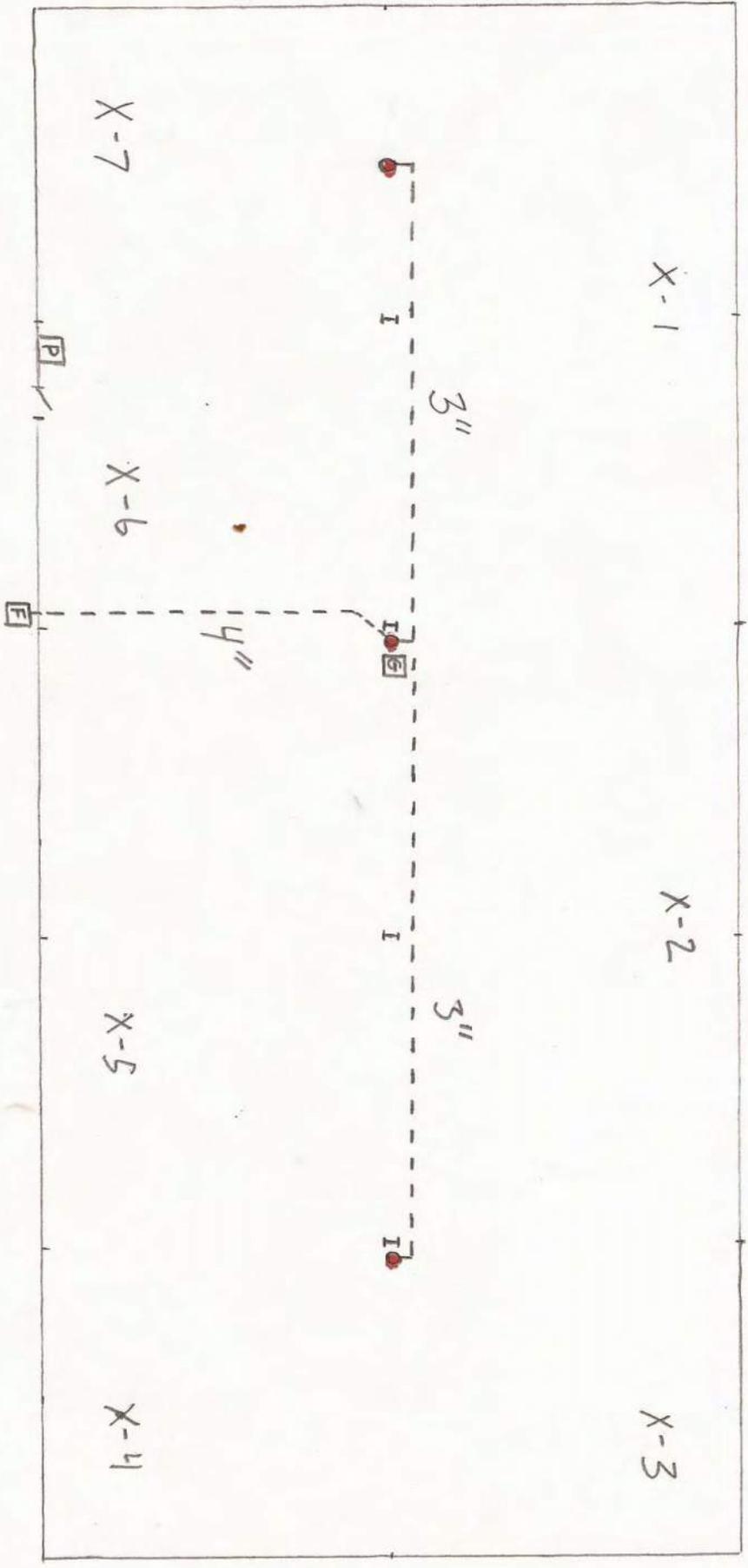
ISSUED FOR FINAL	DESIGNED BY PJP
DATE: 3/17/2014	REVIEWED BY DPN

PROJECT/CLIENT
 Former Alliance Precision Plastics
 NYSDEC Site No. 828110
 595 Trabold Road
 Gates, New York
 Client: Trabold Road Industrial
 Center, LLC

LABELLA
 Associates, D.P.C.

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 COPYRIGHT 2003

0 1,000 2,000 4,000 Feet
 1 inch = 2,000 feet



MAY 1, 2015

SUB-SLAB DEPRESSURIZATION SYSTEM DIAGRAM
 Installed by: Mitigation Tech, 55 Shumway Rd., Brockport, NY 14420
 595 Trabold Rd., Gates, NY NYSDEC Site #C828110

[F] = Fan w/ exterior switch
 [P] = circuit breaker
 [G] = vacuum gauge

● = Suction Point
 x = Test Point
 - - - = Pipe Run

FIGURE 2



APPENDIX A



Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



	Site Details	Box 1	
Site No. 828110			
Site Name Alliance Precision Plastics			
Site Address: 595 Trabold Road	Zip Code: 14624		
City/Town: Gates			
County: Monroe			
Site Acreage: 7.000			
Reporting Period: to November 10, 2022 December 22, 2022			
		YES	NO
1. Is the information above correct?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
If NO, include handwritten above or on a separate sheet.			
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.			
5. Is the site currently undergoing development?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Box 2	
		YES	NO
6. Is the current site use consistent with the use(s) listed below?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Are all ICs in place and functioning as designed?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.			
A Corrective Measures Work Plan must be submitted along with this form to address these issues.			
_____ Signature of Owner, Remedial Party or Designated Representative		_____ Date	

Description of Institutional Controls

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
	Trabold Road Industrial Center LLC.	IC/EC Plan Ground Water Use Restriction Landuse Restriction Building Use Restriction Site Management Plan O&M Plan

Where contamination remains at the Property subject to the provisions of the Site Management Plan ("SMP"), there shall be no constructions or that results in unacceptable human exposure to contaminated soils. The property is prohibited from ever being used for purposes other than Commercial as described in 6 NYCRR Part 375-1.8(2)(iii) and Industrial as described in 6 NYCRR Part 375-1.8(g)(iv) without the express written waiver of such prohibition by the Department or Relevant agency.

Use of Groundwater is underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH or the Monroe County Department of Health to render it safe for the use of drinking water or industrial purposes.

Periodic certification shall be provided by the property owner for the Department or Relevant Agency, which will certify that the institutional and engineering controls put in place are unchanged from the previous certification, comply with the SMP, and have not been impaired.

An Operation and maintenance plan has been put into place to ensure the continued proper operation of the SSDS system.

Description of Engineering Controls

<u>Parcel</u>	<u>Engineering Control</u>
	Vapor Mitigation

A SSD system was installed voluntarily by the owner in the warehouse portion of the building to address potential exposures to vapor intrusion. The SMP (written by the owner's consultant) refers to the SSD system as an Engineering Control (EC) but the NYSDEC does not consider it to be an EC.

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the Engineering Control certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

X

2. For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:

(a) The Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

X

IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. 828110

Box 6

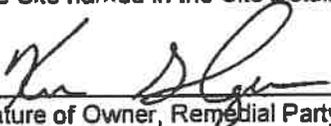
SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1, 2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I KENNETH GLAZER at 595 TRABOLD LLC
print name print business address

am certifying as MEMBER/OWNER (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.


Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

12/22/22
Date

EC CERTIFICATIONS

Box 7

Qualified Environmental Professional Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

MICHAEL F. POLYCHATY, PE at LuBella Associates, DPC
print name 300 State St, Rochester, NY 14614
print business address

am certifying as a Qualified Environmental Professional for the Owner
(Owner or Remedial Party)

Michael F. Polychaty
Signature of Qualified Environmental Professional, for
the Owner or Remedial Party, Rendering Certification

Stamp
(Required for PE)

12/22/2022
Date



APPENDIX B

LABELLA

Associates, D.P.C.

300 State Street
Rochester, New York 14614
Phone: 585-454-6110
Fax: 585-454-3066

Site Wide Inspection Form

Project Name: Former Alliance Precision Plastics

Location: 595 Trabold Rd., Gates, NY

LaBella Project No.: 2230425

Inspected By: M. Pelychuk

Date of Inspection: 12/6/2022

Weather Conditions: ~40° cloudy, light wind

Comments

Compliance with SMP/Deed Restriction

Site currently vacant industrial building

Condition of SSDS

Good + operational

Condition of groundwater monitoring wells to be used for long-term monitoring as indicated in SMP.

good

General site conditions at time of inspection

good

Site management activities currently being conducted (if any)

None observed

Site records up to date?

yes

Additional Notes/Comments:

None







NO PARKING
FIRE DEPARTMENT





NOTICE

RADON SYSTEM MONITOR

DO NOT ALTER OR DISCONNECT

Green light indicates vacuum pressure is within system operating. A red light and audible alarm indicates a loss of vacuum pressure.

If red light appears alarm sounds disconnect power from alarm and call system installer for service. The EPA recommends using Radon level of not over 2 pCi/L.

Checkpoint for Alarm