

**PERIODIC REVIEW ANNUAL REPORT No. 10
(JULY 14, 2021 – JULY 1, 2022)
CARRIAGE CLEANERS-BRIGHTON
NYSDEC SITE NO. 828120**

WORK ASSIGNMENT NO. D009809-15

Prepared for:

**New York State Department of Environmental Conservation
Albany, New York**

Prepared by:

**MACTEC Engineering and Geology, P.C.
Portland, Maine**

MACTEC: 3616206118

SEPTEMBER 2022

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TABLE OF CONTENTS

LIST OF TABLES.....	II
LIST OF FIGURES.....	III
LIST OF APPENDICES.....	IV
GLOSSARY OF ACRONYMS AND ABBREVIATIONS	V
EXECUTIVE SUMMARY	ES-1
1.0 SITE OVERVIEW	1-1
1.1 INTRODUCTION	1-1
1.2 SITE HISTORY AND DESCRIPTION	1-2
1.3 PHYSICAL SETTING	1-3
1.4 CLEANUP GOALS AND REMEDIAL PROGRESS	1-3
1.4.1 Description of Selected Remedy and Associated Cleanup Goals.....	1-3
1.4.2 Remedial Progress	1-4
2.0 EVALUATION OF REMEDY PERFORMANCE, EFFECTIVENESS AND PROTECTIVENESS.....	2-1
2.1 SITE MANAGEMENT STATUS.....	2-1
2.2 INSTITUTIONAL CONTROLS/ENGINEERING CONTROLS.....	2-1
2.2.1 Institutional Controls	2-2
2.2.2 Engineering Controls.....	2-2
2.2.2.1 Asphalt and Concrete Cover System	2-2
2.2.2.2 Soil Vapor Extraction System.....	2-3
2.2.2.3 Groundwater Extraction and Treatment System.....	2-5
2.3 ADDITIONAL ACTIVITIES.....	2-5
2.3.1 Downgradient Well Monitoring	2-5
2.3.2 Bedrock and Soil Investigation.....	2-7
3.0 CONCLUSIONS AND RECOMMENDATIONS	3-1
3.1 INSTITUTIONAL CONTROLS	3-1
3.2 ENGINEERING CONTROLS	3-1
3.3 RECOMMENDATIONS.....	3-1
4.0 REFERENCES	4-1

LIST OF TABLES

Tables

- 2.1 PCE Concentrations in Subsurface Soil
- 2.2 Groundwater Monitoring Well PCE Concentrations

LIST OF FIGURES

Figures

- 1.1 Site Location
- 1.2 SSDS Locations
- 2.1 Vapor and Soil Sampling Locations
- 2.2 SVE Influent and Effluent VOC Concentration
- 2.3 Groundwater Monitoring Well Locations
- 2.4 Groundwater Contours April 2022
- 2.5 Extent of PCE in Groundwater

LIST OF APPENDICES

Appendices

Appendix A Monroe County Sewer Use Permit

GLOSSARY OF ACRONYMS AND ABBREVIATIONS

ACSM	American Congress on Surveying and Mapping
ALTA	American Land Title Association/
EC	engineering control
FS	Feasibility Study
ft	foot
GES	Groundwater and Environmental Services, Inc.
gpm	gallon(s) per minute
GWETS	groundwater extraction and treatment system
IC	institutional control
lbs/hr	pounds per hour
MACTEC	MACTEC Engineering and Consulting, P.C.
µg/L	microgram(s) per liter
ND	non-detect
NYSDEC	New York State Department of Environmental Conservation
O&M	operation and maintenance
OBG	O’Brien and Gere Engineers
PCE	tetrachloroethene
ppbv	part(s) per billion by volume
ppm	part(s) per million
PRR	periodic review report

GLOSSARY OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

RA	Remedial Action
RI	Remedial Investigation
ROD	Record of Decision
RSO	remedial system optimization
SCO	soil cleanup objective
Site	Carriage Cleaners site
SM	site management
SMP	Site Management Plan
SSDS	sub-slab depressurization system
SVE	soil vapor extraction
SVI	soil vapor intrusion
USEPA	United States Environmental Protection Agency
VOC	volatile organic compound

EXECUTIVE SUMMARY

The Carriage Cleaners site (Site No. 828120; hereinafter referred to as the Site) is a commercially zoned parcel approximately 0.35 acres in size located at the intersection of Brooklawn Drive and Monroe Avenue, in Brighton, New York (Figure 1.1). Dry cleaning operations have occurred at the Site for at least 30 years; a Town of Brighton Sewer inspection suggests that dry cleaning operations may have occurred at the Site as early as 1959. Carriage Cleaners utilized tetrachloroethene (PCE) during dry-cleaning operations until October 10, 2018 when operations switched to a naphthalene-based product.

The remedy for the Site was selected and a Record of Decision (ROD) issued in March 2008 (New York State Department of Environmental Conservation [NYSDEC], 2008). Contaminants of concern at the Site are volatile organic compounds (VOCs), specifically PCE and its breakdown components. Remedial Action (RA) work began in June 2011 and construction was completed in December 2011. RA activities included:

1. At a suspected contaminant source area adjacent to the active dry cleaner building, contaminated soil was excavated to bedrock (approximately sixteen feet below ground surface). Excavated material was transported and disposed at an off-site facility. The excavation was backfilled with clean soil.
2. A soil vapor extraction (SVE) system was installed. Contaminated air from the extraction wells previously underwent treatment by granular activated carbon to remove contaminants before being discharged to the atmosphere; air treatment has been discontinued as it was determined to no longer be needed to achieve applicable air quality guidelines. The SVE system was shut down from December 20, 2017 to November 21, 2018 during execution of a rebound study and was restarted after witnessing rebound in the soil vapor.
3. A groundwater extraction treatment system (GWETS) was installed. The GWETS consisted of one extraction well which collected groundwater on site to prevent continued off-site migration of contaminants. Contaminated water from the extraction well was treated to remove contaminants before being discharged to the sanitary sewer in accordance with an approved permit (Appendix A). The GWETS was shut down in September 2020 at the request of the NYSDEC.

A Site Management (SM) Plan was created to outline the controls established to meet the ROD requirements. Because remaining contaminated groundwater exists beneath the Site, engineering controls (ECs)/institutional controls are required to protect human health and the environment. EC systems at the Site include:

1. A cover system consisting of asphalt pavement, concrete sidewalks, and concrete building slabs.
2. Site fencing to keep the public from approaching the Site treatment trailer.
3. A SVE system to treat soil contamination on-site.
4. Seventeen sub-slab depressurization systems (SSDS) to mitigate soil vapor in the neighboring community. The SSDSs are being monitored and maintained by the NYSDEC under a separate contract and are not a focus of the annual Periodic Review Report (PRR), however they are still active and their locations in relation to the Site are shown in Figure 1.2.

This is the tenth annual PRR for the Site. The PRR summarizes the SM activities completed at the Site from July 14, 2021 through July 1, 2022 and evaluates the effectiveness of the RA conducted in 2011. During the reporting period, SM requirements were met. Based on this review, the combined remedy continues to be protective of the public health and the environment; several of the remedial action objectives in the ROD have been achieved, and ongoing SM activities could be optimized while continuing to be protective of public health and the environment.

Following the submittal of the January 2020 Remedial System Optimization Report (RSO), the GWETS was shut down (September 2020) at the request of the NYSDEC. A RSO work plan to implement the recommended action to convert the existing SVE system to a SSDS was approved by the NYSDEC on January 14, 2022. Implementation of this RSO is planned to begin in the fourth quarter of 2022 and will follow the procedures discussed in the RSO Work Plan (MACTEC, 2021e) as well as include asbestos containing materials abatement if needed for floor tiles and mastic.

1.0 SITE OVERVIEW

1.1 INTRODUCTION

The remedy for the Carriage Cleaners site (Site) was selected and a Record of Decision (ROD) issued in March 2008 (New York State Department of Environmental Conservation [NYSDEC], 2008). Remedial Action (RA) work began in June 2011 and was completed in December 2011 (MACTEC Engineering and Consulting, P.C. [MACTEC], 2012).

Site Management (SM) has consisted of the operation of a groundwater extraction and treatment system (GWETS) to contain the groundwater contaminant plume in bedrock fractures, and a soil vapor extraction (SVE) system to treat contaminated vadose zone soil beneath the Site building.

Full-time combined SVE and GWETS operations and corresponding SM activities were initiated in January 2012. The GWETS was shut down in September 2020 at the request of the NYSDEC. The SVE system is being operated, monitored, and maintained by Groundwater and Environmental Services, Inc. (GES) under a standby contract (No. C100607) to the NYSDEC and under direction by MACTEC.

This Periodic Review Report (PRR) is the tenth annual PRR for the Site. This PRR, which covers the period of performance from July 14, 2021 to July 1, 2022 (hereinafter referred to as the “reporting period”), includes:

- required institutional control/engineering control (IC/EC) certification by the site owner and the project engineer (MACTEC);
- summary and documentation of site-related data to support IC/EC certification;
- discharge monitoring data for the certification period;
- a description of the on-line treatment system(s) performance; and
- groundwater sampling results and findings.

1.2 SITE HISTORY AND DESCRIPTION

The Site is located at 2101 Monroe Avenue, Town of Brighton, Monroe County, New York (Figure 1.1). The Site is a commercially zoned parcel approximately 0.35 acres in size located at the intersection of Brooklawn Drive and Monroe Avenue. The area is a densely populated, mixed commercial and residential area. The Site is currently occupied by a one-story cement block laundry facility, a two-story wood house, and a paved parking lot.

Dry cleaning operations have occurred at the Site for at least 30 years; a Town of Brighton Sewer inspection suggests that dry cleaning operations may have occurred at the Site as early as 1959. Up until October 10, 2018 Carriage Cleaners utilized tetrachloroethene (PCE) during dry-cleaning operations. Since then, naphthalene, a petroleum-based solvent, has been used.

In 2003, a petroleum spill (Spill Number 0306131, closed on March 27, 2013) occurred adjacent to the Site at a former Newcomb Oil/Citgo Gasoline Station located at 2087 Monroe Avenue. PCE was discovered within groundwater downgradient of the Site during a series of investigations related to the petroleum spill. Due to the proximity of the Site and the history of PCE used during dry cleaning operations at the Site, the Carriage Cleaners Property was determined to be a potential source of the PCE detected within the groundwater (NYSDEC, 2008).

Because of the PCE detections, a Phase II Environmental Site Assessment was completed by the site owner in 2004. This investigation did not identify an onsite source for the PCE; however, the assessment suggested that potential ruptures within the sanitary and storm sewer line could be a source for the PCE detected within groundwater. The NYSDEC completed an offsite vapor intrusion study at four nearby residential properties. The results from this study led to the installation of one basement ventilation system and four sub-slab depressurization systems (SSDS) as part of an interim remedial measure (NYSDEC, 2008).

As a result of these investigations, the NYSDEC listed the Site as a Class 2 Site in the Registry of Inactive Hazardous Waste Disposal Sites in New York in June of 2004. The NYSDEC ordered a Remedial Investigation (RI) and Feasibility Study (FS) to be completed (NYSDEC, 2008).

1.3 PHYSICAL SETTING

The geology beneath and near the Site directly influences the distribution and ability for contaminants to migrate from the Site. Site geology consists of a sandy glacial till (overburden beneath the Site) comprised of loose to dense, fine, and medium sand with some silt and gravel overlying a medium dark gray dolomite (bedrock beneath the Site) of the Lockport Group. The thickness of the overburden ranges from approximately 3 feet to 15 feet. Based on data collected as part of the RI, O'Brien and Gere Engineers (OBG) reported that three zones can be distinguished within the bedrock unit. These include a weathered bedrock zone immediately below the till deposit ranging from 1 to 3 feet in thickness, a shallow fractured bedrock zone with a thickness of approximately 6 to 15 feet, and a more competent intermediate bedrock zone where fracture frequency decreases with depth. The data suggest that there is a hydraulic connection/communication between the overburden zone and the shallow bedrock groundwater zone (OBG, 2007).

1.4 CLEANUP GOALS AND REMEDIAL PROGRESS

1.4.1 Description of Selected Remedy and Associated Cleanup Goals

Based on the results of the RI/FS and the criteria identified for evaluation of alternatives, the NYSDEC selected excavation (to the extent practical) to remove from the Site contaminated soil exhibiting concentrations of PCE greater than the soil cleanup objective (SCO) for unrestricted use (1.3 parts per million [ppm]). The selected remedy also included operation of an on-site SVE system to treat residual contaminated soil (i.e., beneath the building) and operation of a GWETS to contain contaminated shallow bedrock groundwater, along with the continued operation of the existing off-site SSDS and periodic soil vapor intrusion (SVI) monitoring at nearby residences.

ICs in the form of an environmental easement are being used to impose land use restrictions and groundwater use restrictions at the Site. Specifically, the environmental easement includes:

- limiting use and development of the property to commercial and industrial activities;
- land use restrictions which require proper worker protections during construction or excavation activities that would potentially cause a worker to contact contaminated soil, groundwater, or soil vapor;
- compliance with the approved Site Management Plan (SMP);

- groundwater use restrictions which preclude the use of groundwater at the Site without prior notification and approval from NYSDEC;
- restrictions related to soil, groundwater, and soil vapor implemented on the site property; and
- a periodic certification of ICs/ECs.

1.4.2 Remedial Progress

In accordance with the ROD, operation of the remedy components will continue until the remedial objectives have been achieved, or until the NYSDEC determines that continued operation is technically impracticable or not feasible.

In March 2017, results of collected soil samples indicated that the SCO was achieved beneath the building. Therefore, the SVE system was taken offline on December 20, 2017 to conduct a rebound study to evaluate the need for its continued operation. The SVE system was turned back on to support SVI mitigation in the Site building on November 21, 2018. Following the submittal of the January 2020 Remedial System Optimization Report (RSO), the GWETS was shut down (September 2020) at the request of the NYSDEC. A RSO work plan to implement the recommended action to convert the existing SVE system to a SSDS was approved by the NYSDEC on January 14, 2022 and implementation of this RSO is planned for Fall 2022.

2.0 EVALUATION OF REMEDY PERFORMANCE, EFFECTIVENESS AND PROTECTIVENESS

In this section, SM activities are discussed. Ongoing SM activities include ICs/ECs, the monitoring program, and the implementation of the site Operation and Maintenance (O&M) Plan which is included in the SMP. The comprehensive SMP developed for the Site includes plans for ICs/ECs, O&M, long term monitoring, and associated reporting (MACTEC, 2013).

2.1 SITE MANAGEMENT STATUS

During this reporting period MACTEC performed O&M oversight of the on-site standby remedial contractor GES and prepared quarterly and monthly O&M monitoring reports. As requested by the NYSDEC, Monthly Progress Reports began in October 2021 and quarterly reports were no longer required. GES provided MACTEC with transmittals of field data tables and a summary of site activities included in the PRR. Since the previous PRR, MACTEC has prepared Revision No. 3 of the SMP for the site (MACTEC, 2022).

This PRR was completed using site specific documentation including the Site's ROD (NYSDEC, 2008), periodic site inspections conducted by GES, the quarterly and monthly O&M monitoring reports, and the SMP. This review was conducted to confirm that established controls according to the SMP are operational and effective, that the SMP is being implemented and conducted accordingly, and that the remedy remains protective of the environment and/or public health. A summary of SM activities completed during the reporting period and an evaluation of the performance, protectiveness, and effectiveness of the remedy is provided below.

2.2 INSTITUTIONAL CONTROLS/ENGINEERING CONTROLS

Due to residual contamination present in subsurface soils at this Site above the SCO for unrestricted use (1.3 ppm for PCE), and in groundwater above drinking water standards, ICs and ECs have been implemented to protect public health and the environment. The IC/ECs are designed to prevent:

- ingestion/direct contact with contaminated soil;
- inhalation of or exposure to contaminants volatilizing from contaminated soil;
- ingestion of groundwater with contaminant levels that exceed drinking water standards; and

- contact with or inhalation of volatiles from contaminated groundwater.

2.2.1 Institutional Controls

A series of ICs were put in place to provide site restrictions and implement, maintain, and monitor the ECs. Currently, ICs in the form of an environmental easement are being used to impose land use restrictions and groundwater use restrictions at the Site. Based on current site conditions and inspections conducted throughout the reporting period, there has not been a change in property use, site activities are compliant with the ICs and the environmental easement, and no change in ICs are required.

2.2.2 Engineering Controls

In accordance with the ROD, the following ECs were put in place:

- use of the existing asphalt pavement, concrete sidewalks, and concrete building slabs as a cover system to minimize direct contact to impacted subsurface soil;
- an SVE system to treat soil contamination on-site;
- groundwater monitoring wells and a GWETS to prevent and monitor off-site migration of contaminants through groundwater; and
- site fencing to keep the public from approaching the treatment trailer.

The following subsections describe the current condition of the various ECs and evaluates their performance and need for continued O&M.

2.2.2.1 Asphalt and Concrete Cover System

The cover system, comprised of asphalt pavement and concrete sidewalks and building slabs, documented in the American Land Title Association/American Congress on Surveying and Mapping (ALTA/ACSM) Land Title Survey included in Appendix A of the SMP (MACTEC, 2013) is a permanent control to prevent direct contact to impacted subsurface soil. The cover system was observed during the reporting period to be intact and continuing to provide an effective barrier to site soils. However, as described in subsequent sections, the SCO for the site has been achieved and therefore the cover system may no longer be required.

2.2.2.2 Soil Vapor Extraction System

The purpose of the SVE system is to treat residual contamination in overburden, vadose zone soil. The general configuration of the SVE system's extraction wells and vapor monitoring points is presented in Figure 2.1.

PCE concentrations in soil samples indicate that the SCO has been reached in subsurface soil and that the SVE system has treated subsurface soil to the extent practicable as described in the ROD. Table 2.1 shows that 2017 PCE concentrations are below the SCO of 1.3 ppm and reduced compared to 2013 results.

Table 2.1 PCE Concentrations in Subsurface Soil

Boring Location	December 2008		September 2013		March 2017	
	Depth Interval (ft bgs)	PCE Concentration (ppm)	Depth Interval (ft bgs)	PCE Concentration (ppm)	Depth Interval (ft bgs)	PCE Concentration (ppm)
DP-14	6	290	4 – 6	140.01	4 – 6	0.0061
			6 – 8	39.01	6 – 8	0.019
			10 – 11.5	0.85	10 – 11.5	Not Sampled

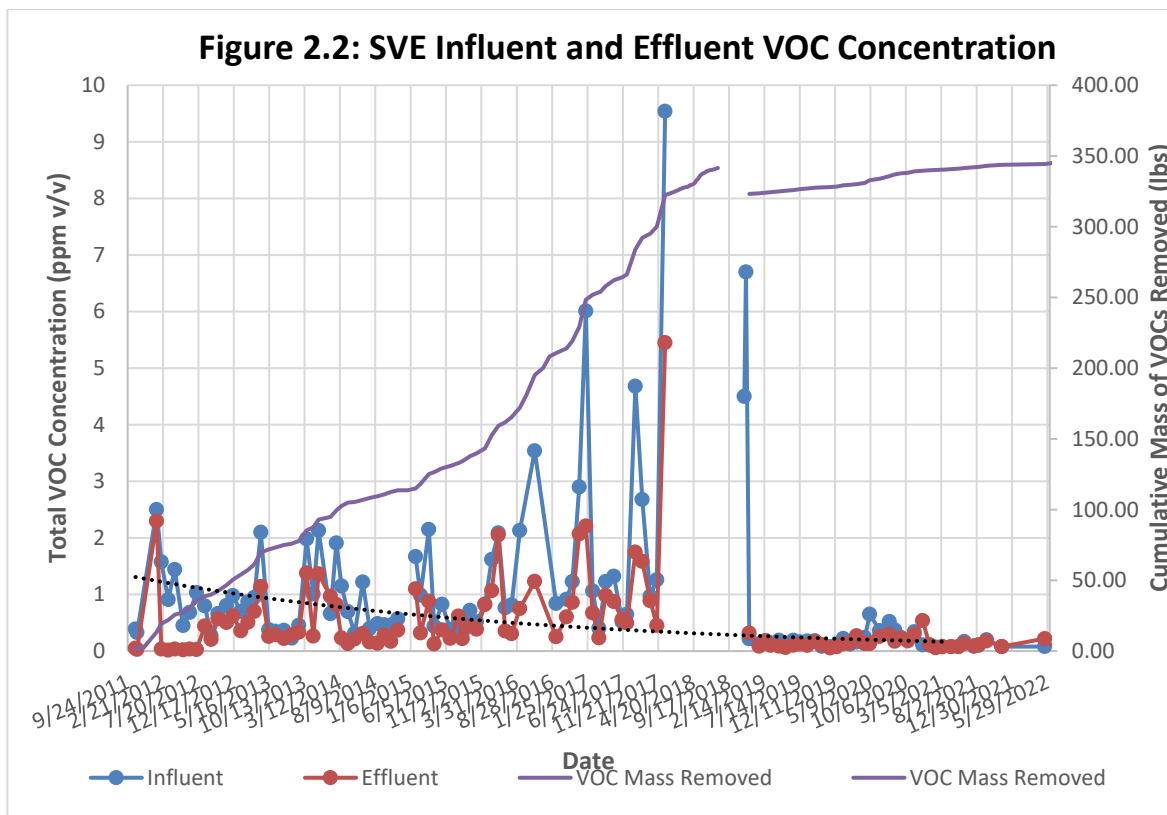
Notes:

Results in **bold** exceed the SCO of 1.3 ppm.

ft bgs = feet below ground surface

ppm = parts per million

As a result of the March 2017 soil investigation, a rebound study involving shutdown of the SVE system from December 2017 until November 2018 was conducted. Elevated VOC concentrations in the fourth quarter 2018 were observed and the SVE system was restarted. Concentrations thereafter returned to normal range as shown on Figure 2.2. A trend line showing a slight decrease in influent VOC concentration since the beginning of SVE system operation and the cumulative total mass of VOCs removed from the system are also depicted on Figure 2.2.



During the current PRR reporting period, average total VOC concentration per quarter in the combined influent soil vapor samples utilizing the United States Environmental Protection Agency (USEPA) TO-15 analysis was:

- 2021 third quarter – 130 parts per billion by volume (ppbv);
- 2021 fourth quarter – 82 ppbv;
- 2022 first quarter – System In-active; and
- 2022 second quarter – 165 ppbv.

Through June 17, 2022, the aggregate mass of total VOCs extracted by the SVE system is estimated to be approximately 345.01 pounds.

During the PRR reporting period (July 14, 2021 through July 1, 2022) monthly effluent samples were collected from July through December 2021 and May through June 2022 to evaluate compliance with the air discharge criteria for the Site, defined in the DAR-1 Guidelines for the Control of Toxic Ambient Air Contaminants and Title 6 of the New York Codes, Rules, and Regulations Part 212. The system was shut down due to electrical failure from December 10, 2021 to April 6, 2022. The

average monthly combined stack discharge for the period did not exceed the discharge objective of 0.1 pounds per hour (lbs/hr) of high toxicity contaminants, with the maximum monthly average combined stack discharge occurring in the month of May 2022 at 0.0022 lbs/hr.

Overall, the SVE system has generally performed as expected over its ten years of operation and has achieved its goal of reducing soil concentrations to below the SCO. Although there are still measurable PCE concentrations in soil vapor at the SVE influent, it is likely attributable to off gassing of groundwater, overburden soils, and/or bedrock from the subsurface. This impacted soil vapor could impact indoor air concentrations at the dry cleaner building over time, however, given the high PCE concentrations in the building sub slab, they are unlikely to make conditions worse. At this point in time, a SSDS would be better suited for vapor intrusion mitigation than the ongoing operation of the SVE system. A RSO work plan to implement the recommended action to convert the existing SVE system to a SSDS was approved by the NYSDEC on January 14, 2022, and implementation of this RSO is planned to begin in Fall 2022.

2.2.2.3 Groundwater Extraction and Treatment System

As noted in the Third Quarter 2020 OM&M Report, the GWETS was shut down on September 9, 2020, upon the request of the NYSDEC.

2.3 ADDITIONAL ACTIVITIES

2.3.1 Downgradient Well Monitoring

Monitoring wells MW-111I, HA-114, MW-210, MW-8B, MW-9, MW-9B, MW-6, and MW-6B, and extraction well EW-1, shown in Figure 2.3, were gauged and sampled in the week of April 11, 2022 as part of a combined comprehensive groundwater sampling event including wells from nearby Former Speedy's Cleaners. Figure 2.4 presents the groundwater contours. Table 2.2 below

summarizes groundwater PCE concentrations in monitoring wells onsite and adjacent to the Site. The extent of PCE in groundwater in April 2022 is presented in Figure 2.5.

Table 2.2
Groundwater Monitoring Well PCE Concentrations

Date	Groundwater PCE Concentration (µg/L)							
	MW-111I	HA-114	MW-210	MW-8B	MW-9	MW-9B	MW-6B	MW-6
January 2009	240	-	230	-	-	-	-	
December 2012	-	31	-	-	-	-	-	
2/14/2013	-	-	4.3	-	-	-	-	-
10/10/2013	-	-	5.1	-	-	-	-	-
4/4/2014	-	-	2.6	-	-	-	-	-
12/17/2014	83	13	3.5	-	-	-	-	-
5/26/2015	96	55	1.8	620	-	ND	-	-
8/25/2015	150	76	2.8	810	5.5	ND	-	-
4/25/2016	200	6.3	1.1	450	1.9	ND	-	-
11/9/2016	290	19	160	380	3.9	46	-	-
5/10/2017	190	2.3	7.5	140	1.7	0.73	-	-
11/1/2017*	92	10	5.6	490	5.1	ND	-	-
5/2/2018**	170	42	2.6	480	0.94	ND	-	-
11/14/2018	44	60	3.7	380	ND	6.5	-	-
1/23/2019	-	-	-	-	-	-	335	-
2/6/2019	-	-	-	-	-	-	1400	-
2/20/2019	-	-	-	-	-	-	130	-
3/14/2019	-	-	-	-	-	-	78.5	-
3/21/2019	-	-	-	-	-	-	26	-
4/3/2019	-	-	-	-	-	-	19.5	-
4/17/2019	-	-	-	-	-	-	12	-
5/1/2019	49	30	1.2	290	2.2	-	5.8	31000
5/15/2019	-	-	-	200	-	-	-	-
6/12/2019	-	-	-	300	-	-	-	-
6/25/2019	-	-	-	290	-	-	-	-
7/1/2019	-	-	-	380 F1	-	-	-	-
10/16/2019	130 E	140 E	8	620 E	1.2	ND	1000 E	5500
3/30/2020***	88	30	1.7	380	2.3	ND	5.3	32000
11/11/2020	5.7	130	8.7	540	3.2	ND	1500	-
3/20/2021****	2.6	41	16	320	5.7	ND	410	27000
4/12/22 and 4/13/22	58	11	14	220	1.9	ND	3.2	19000

Notes:

RemOx® SR permanganate cylinders were installed in MW-6 and MW-6B during second quarter of 2014 and removed December 2018 and were not sampled during this period

Groundwater extraction pilot testing conducted at MW-6B and MW-8B from December 2018 to July 2019

- not sampled

ND – non-detect

*Sample for well HA-114 was collected on 11/2/2017

**Samples for wells HA-114 and MW-210 were collected on 5/3/2018

***Samples for wells MW-9, MW-9B, MW-210, and HA-114 were collected on 3/31/2020

****Samples were taken throughout the week of 3/20/2021

F1 – MS and/or MSD Recovery is outside acceptance limits
E – Result exceeded calibration range
H – Sample was prepped or analyzed beyond the specified holding time

Generally, PCE concentrations decreased since the last semi-annual sampling in March 2021, except for MW-111I.

MW-210 is the only downgradient well that has been monitored consistently on a semiannual basis since GWETS and SVE system startup. Historical results have indicated a seasonal fluctuation in PCE concentration, with a slight rise in concentration in the summer/fall seasons. Results from the samples collected from 2009 to 2022 were found to be within the range of past observations, except for the November 2016 concentration of 160 µg/L. This outlier can be attributed to the heterogeneity of the plume and bedrock fractures, and still indicates a decreasing trend in concentration.

2.3.2 Bedrock and Soil Investigation

In 2013 additional investigation, including the installation of bedrock well MW-6B, indicated the presence of PCE diffused into the bedrock matrix, resulting in PCE detected at high concentrations. Methanol Extraction of Rock Chips testing of rock core from MW-6B indicated PCE concentrations as high as 48 mg/kg were present in the matrix of the shallow bedrock. Matrix diffusion will occur if there is a concentration gradient between the PCE-contaminated matrix and the groundwater-filled fracture.

Therefore, in 2014 potassium permanganate (RemOx® SR) cylinders were installed to passively treat groundwater and bedrock in the vicinity of MW-6/6B. Since the removal of the cylinders in late 2018, groundwater contaminant concentrations reported in the bedrock at the MW-6B on have varied with the seasonal fluctuation of the groundwater table with detections of 5.3 micrograms per liter (µg/L), 1,500 µg/L, 410 µg/L and 3.2 µg/L during the March 2020, November 2020, March 2021 and April 2022 sampling events, respectively.

Lingering contamination is evident in MW-6, an overburden well located near the northeast corner of the building in the narrow alleyway where PCE was temporarily stored and presumably spilled. In MW-6, PCE concentrations have remained elevated over the last four sampling events. PCE detections of 5,500 µg/L (October 16, 2019), 32,000 µg/L (March 30, 2020), 27,000 µg/L (March 30, 2021) and 19,000 µg/L (April 13, 2022) indicate contamination could be desorbing into the

groundwater from the overburden soils under the building adjacent to MW-6. The overburden soils directly in the vicinity of MW-6 were excavated down to bedrock and replaced with clean fill in 2017. The overburden soils beneath the building were not removed.

3.0 CONCLUSIONS AND RECOMMENDATIONS

It is concluded that the site remedy continues to be protective of the public health and the environment and is compliant with the decision document. However, portions of the remedy could be omitted or optimized while continuing to be protective.

3.1 INSTITUTIONAL CONTROLS

The current ICs are adequate to achieve the objectives for protection of human health and the environment based on current site use.

3.2 ENGINEERING CONTROLS

The current ECs are adequate to achieve the objectives for protection of human health and the environment based on current Site use. The SCO has been achieved, indicating that the SVE system and cover system may no longer be necessary for the purpose of soil remediation. Although the degree of groundwater containment cannot be clearly demonstrated, observed influent groundwater concentrations and surrounding groundwater concentrations generally exhibit a decreasing trend.

3.3 RECOMMENDATIONS

Based on the information presented in this PRR, the following is proposed:

- Conversion of the SVE system to an SSDS: the SCO has been achieved, and conversion of the existing SVE system to an SSDS will mitigate potential SVI issues while reducing O&M costs.
- Evaluate a viable method to reduce the concentration of the onsite groundwater VOC plume.
- Continue to further define/delineate the groundwater plume off-Site and evaluate the potential for a comingled plume with Former Speedy's Dry Cleaners.

4.0 REFERENCES

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- MACTEC, 2017b. *Soil Vapor Extraction Rebound Study Work Plan – Carriage Cleaners Site – Site #828120*. Prepared for the New York State Department of Environmental Conservation. November 2017.
- MACTEC, 2018a. *Periodic Review Report No. 6 (July 1, 2017 – June 30, 2018) – Carriage Cleaners-Brighton – NYSDEC Site No. 828120*. Prepared for the New York State Department of Environmental Conservation. November 2018.
- MACTEC, 2018b. *Bedrock Remediation Evaluation Pilot Test Work Plan – Carriage Cleaners Site #828120*. Prepared for the New York State Department of Environmental Conservation. December 2018.
- MACTEC, 2019a. *Operations, Maintenance and Monitoring Progress Report (Final) – Third Quarter 2019 - Carriage Cleaners Site – Site #828120*. Prepared for the New York State Department of Environmental Conservation. December 2019.
- MACTEC, 2019b. *Periodic Review Report No. 7 (July 1, 2018 – June 30, 2019) – Carriage Cleaners-Brighton – NYSDEC Site No. 828120*. Prepared for the New York State Department of Environmental Conservation. December 2019.
- MACTEC, 2020a. *Operations, Maintenance and Monitoring Progress Report – Fourth Quarter 2019 - Carriage Cleaners Site – Site #828120*. Prepared for the New York State Department of Environmental Conservation. July 2020.
- MACTEC, 2020b. *Remedial System Optimization Evaluation Report – Carriage Cleaners Site – Site #828120*. Prepared for the New York State Department of Environmental Conservation. July 2020.

MACTEC, 2020c. *Operations, Maintenance and Monitoring Progress Report – First Quarter 2020 - Carriage Cleaners Site – Site #828120*. Prepared for the New York State Department of Environmental Conservation. August 2020.

MACTEC, 2020d *Operations, Maintenance and Monitoring Progress Report – Second Quarter 2020 - Carriage Cleaners Site – Site #828120*. Prepared for the New York State Department of Environmental Conservation. August 2020.

MACTEC, 2021a. *Remedial System Optimization Evaluation Report – Carriage Cleaners Site – Site #828120*. Prepared for the New York State Department of Environmental Conservation. January 2021.

MACTEC, 2021b. *Operation, Maintenance and Monitoring Report – Third Quarter 2020 – Carriage Cleaners Site – Site #828120*. Prepared for the New York State Department of Environmental Conservation. March 2021.

MACTEC, 2021c. *Operation, Maintenance and Monitoring Report – Fourth Quarter 2020 and First Quarter 2021 – Carriage Cleaners Site – Site #828120*. Prepared for the New York State Department of Environmental Conservation. June 2021.

MACTEC, 2021d. *Operation, Maintenance and Monitoring Report – Second Quarter 2021 – Carriage Cleaners Site – Site #828120*. Prepared for the New York State Department of Environmental Conservation. August 2021.

MACTEC, 2021e. *Remedial System Optimization Work Plan – Carriage Cleaners-Brighton – NYSDEC Site No. 828120*. Prepared for the New York State Department of Environmental Conservation. November 2021.

MACTEC, 2022. *Site Management Plan – Revision 3 - Carriage Cleaners-Brighton – NYSDEC Site No. 828120*. Prepared for the New York State Department of Environmental Conservation. April 2022.

New York State Department of Environmental Conservation, 2008. *Record of Decision, Carriage Cleaners – Brighton Site. Town of Brighton, Monroe County, New York. Site Number 8-28-120*. March 2008.

O'Brien and Gere Engineers, Inc. (OBG), 2007. *Remedial Investigation Report Remedial Investigation/Feasibility Study – Carriage Cleaners – Site No. 8-28-120. Town of Brighton, NY*. January 31, 2007.

FIGURES



- Legend**
- SSDS System in Place
 - House is currently abandoned and SSDS is not in operation

Monroe County color digital orthoimagery (2015) obtained from New York State GIS Clearinghouse at: gis.ny.gov

NYSDEC Site # 828120
Carriage Cleaners Site
Brighton, NY



Prepared/Date: BRP 09/25/19
Checked/Date: KC 09/25/19

SSDS Locations

Project 3616206118

Figure 1.2

Document: P:\Projects\physdec1\Contract D007619\Projects\Carriage Cleaners - SM4.0_Deliverables\4.5_Databases\GIS\MapDocuments\PRR_Locations_8.5x11P.mxd
PDF: P:\Projects\physdec1\Contract D007619\Projects\Carriage Cleaners - SM4.0_Deliverables\4.1_Reports\PRR (2017)\Figures\Figure 3 - Vapor and Soil Locations.pdf 09/18/2017 8:21 AM brian.peters





NYSDEC
Carriage Cleaners Site
Brighton, NY

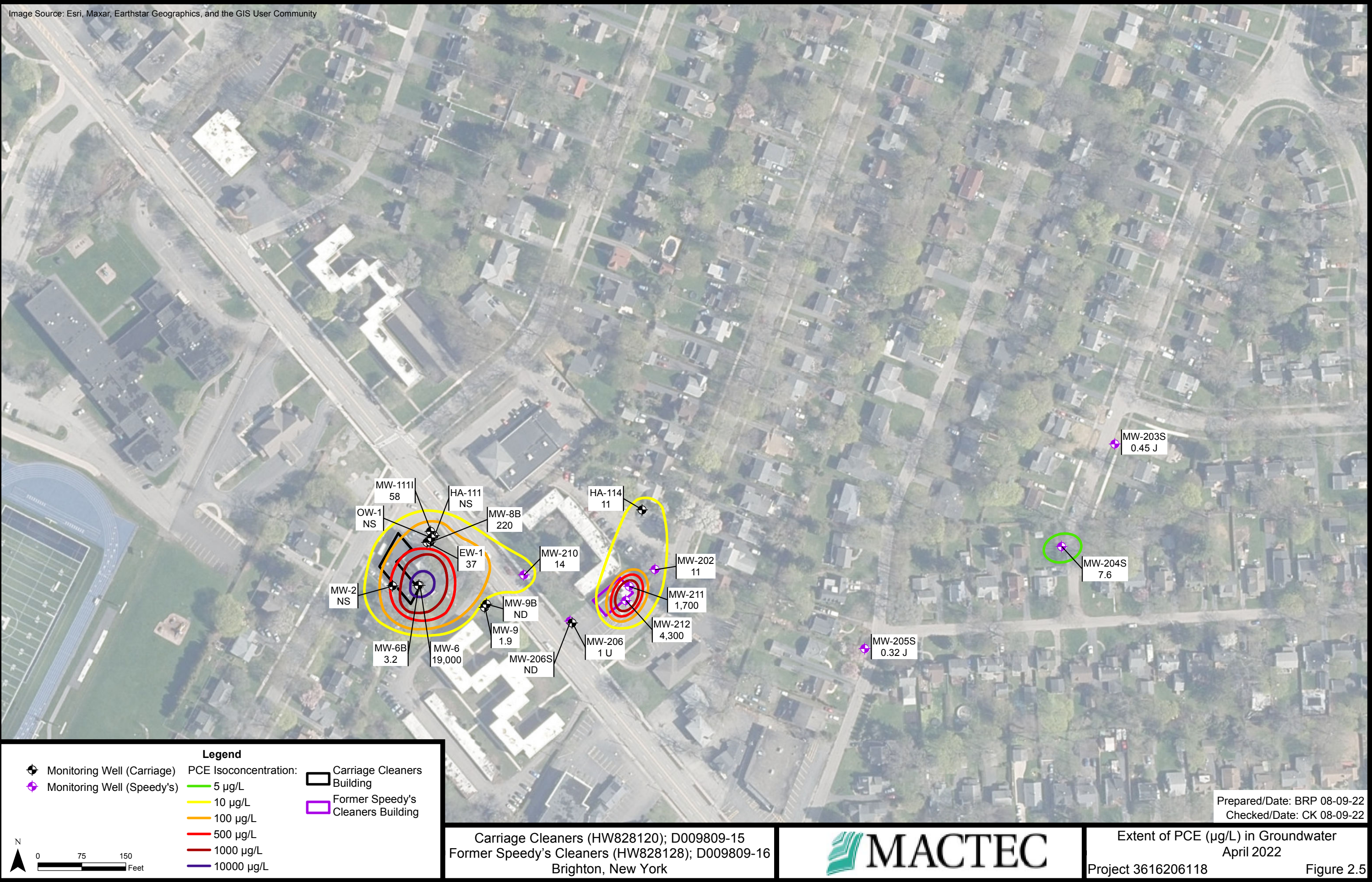


Groundwater Monitoring Well Locations
Project 3616206118
Figure 2.3

Image Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Image Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



APPENDIX A

MONROE COUNTY SEWER USE PERMIT

**COUNTY OF MONROE
SEWER USE PERMIT ENCLOSURE**

NYS DEC- Carriage Cleaners
625 Broadway, 12th Floor
Albany, NY 12233-7017

PERMIT NUMBER: 951
DISTRICT NUMBER: 8574

TYPE OF BUSINESS: Groundwater Remediation
LOCATION: 2101 Monroe Ave
Brighton, NY

SAMPLE POINT: IWC-951.1 – Sample Port on Treatment System

REQUIRED MONITORING & EFFLUENT LIMITS

SAMPLE POINT: IWC-951.1 – Sample Port on Treatment System

SELF-MONITORING FREQUENCY: **MONTHLY**

SAMPLING PROTOCOL: Sampling and analysis shall be performed in accordance with the techniques prescribed in 40CFR part 136 and amendments thereto. A grab sample, collected from the above noted sample point shall be analyzed for the following:

<u>Parameter</u>	<u>Sewer Use Limit</u>	<u>Action Level</u>
Purgeable Aromatics		2.13 mg/L*
Purgeable Halocarbons		2.13 mg/L*
Methyl tert-butyl ether	(monitor only)	

*The summation of the purgeable aromatics and purgeable halocarbons with detection levels greater than 10µg/l shall not exceed 2.13 mg/l.

SPECIAL CONDITIONS:

1. All groundwater must be treated regardless of the influent concentrations.
2. Monthly flow summaries shall be submitted for billing purposes.
3. If there is no discharge for a given month, then a letter must be submitted stating so.

TERMS AND CONDITIONS

GENERAL REQUIREMENTS:

- A.** The permittee agrees to accept and abide by all provisions of the Sewer Use Law of Monroe County (MCSUL) and of all pertinent rules or regulations now in force or shall be adopted in the future.
- B.** In addition to the parameters/limits outlined, the total facility discharge shall meet all other concentration values listed within the MCSUL and as described in Article III, Section 3.3(d) of the Law.
- C.** Included in Article II, Section 2.1 of the MCSUL, is the definition of "Normal Sewage". "Normal Sewage" may be discharged to the sewer system in excess of the concentrations outlined in the definition, however, the facility will be subject to the imposition of a sewer surcharge and possible self-monitoring requirements as a result. Surcharging procedures are outlined in Article X of the MCSUL.
- D.** Regulatory sampling for analytes not specified under "required monitoring" shall be conducted by Monroe County at a minimum frequency of once every three (3) years.
- E.** This permit is not assignable or transferable. The permit is issued to a specific user and location.
- F.** Per Article IX, section 9.9 of the MCSUL, a violation by the permittee of the permit conditions may be cause for revocation or suspension of the permit after a Hearing by the Administrative Board, or if the violation is found to be within the emergency powers of the Director under Section 9.6. The revocation is immediate upon receipt of notice to the Industrial User. If the revocation or suspension is issued under Section 9.6, a Hearing shall be held as soon as possible.
- G.** As provided under Article VI, Section 6.1 of the MCSUL, the Director and/or his duly authorized representatives shall gain entry on to private lands by permission or duly issued warrant for the purpose of inspection, observation, measurement sampling and testing in accordance with the provisions of this law and its implementing Rules and Regulations. The Director or his representatives shall not have authority to inquire into any processes used in any industrial operation beyond that information having a direct bearing on the kind and source of discharge to the sewers or the on-site facilities for waste treatment. While performing the necessary work on private lands, referred to above, the Director or his duly authorized representative shall observe all safety rules applicable to the premises as established by the owner and/or occupant.
- H.** All required monitoring shall be analyzed by a New York State Department of Health certified laboratory. All sampling and analysis must be performed in accordance with Title 40 Code of Federal Regulations Part 136.
- I.** The pH range for this permit is 5.0 – 12.0 su. This range is specifically permitted by the Director as allowed under Article III, Section 3.3(b) of the MCSUL. pH must be analyzed within 15 minutes of the time of collection as specified in 40 CFR, part 136.
- J.** Discharges of wax, fats, oil or grease shall not exceed 100 mg/l as imposed by the Director under Article III, Section 3.3 of the MCSUL.

SURCHARGE CONCENTRATIONS:

Concentration and/or characteristics of normal sewage:

“Normal Sewage” shall mean sewage, industrial wastes or other wastes, which when analyzed, show concentration values with the following characteristics based on daily maximum limits:

a. B. O. D.	300 mg/l
b. Total Suspended Solids	300 mg/l
c. Total Phosphorus, as P	10 mg/l

Annual average concentrations above normal sewage are subject to surcharge as defined in Article X, section 10.7 of the MCSUL.

DISCHARGE LIMITATIONS (SEWER USE LIMITS)

Permissible concentrations of toxic substances and/or substances the Department wishes to control:

The concentration in sewage of any of the following toxic substances and/or substances the Department wishes to control shall not exceed the concentration limits specified when discharged into the County Sewer System; metal pollutants are expressed as total metals in mg/l (ppm): the following pollutant limits are based on daily maximum values:

a. Antimony (Sb)	1.0 mg/l
b. Arsenic (As)	0.5 mg/l
c. Barium (Ba)	2.0 mg/l
d. Beryllium (Be)	5.0 mg/l
e. Cadmium (Cd)	1.0 mg/l
f. Chromium (Cr)	3.0 mg/l
g. Copper (Cu)	3.0 mg/l
h. Cyanide (CN)	1.0 mg/l
i. Iron (Fe)	5.0 mg/l
j. Lead (Pb)	1.0 mg/l
k. Manganese (Mn)	5.0 mg/l
l. Mercury (Hg)	0.05 mg/l
m. Nickel (Ni)	3.0 mg/l
n. Selenium (Se)	2.0 mg/l
o. Silver (Ag)	2.0 mg/l
p. Thallium (Tl)	1.0 mg/l
q. Zinc (Zn)	5.0 mg/l

REPORTING REQUIREMENTS:

- A.** Per the requirements of 40 CFR, Part 403.12, Significant Industrial Users must submit Periodic Reports on Continued Compliance to the Control Authority on a biannual (2/yr) basis. Deadline dates of submission for these reports will be August 15 and February 15, respectively.
- B.** Discharge monitoring reports shall be submitted to the Control Authority upon receipt from the permittee's testing laboratory. Reports submitted from industrial users identified as Significant Industrial Users (SIU) must be accompanied by a certification statement as required by 40 CFR part 403 and the MCSUL, Article VI, section 6.12.
- C.** Any Industrial User subject to the reporting requirements of the General Pretreatment Regulations shall maintain records of all information resulting from any monitoring activities required by 40 CFR, part 403.12 for a minimum of three (3) years. These records shall be available for inspection and copying by the Control Authority. This period of retention shall be extended during the course

of any unresolved litigation regarding the discharge of pollutants by the Industrial User or the operation of the POTW Pretreatment Program or when requested by the Director or the Regional Administrator.

- D.** Pursuant to Article VI, Section 6.10 (4) of the MCSUL and the reporting requirements of the Code of Federal Regulations 40 CFR part 403.12, if a permitted user elects to perform monitoring at compliance monitoring locations more often than required and uses approved laboratory procedures, the results of all such additional monitoring and any additional flow measurements shall be reported to the Director on a timely basis and shall be included in reports as outlined in the MCSUL section 6.10(1)-(4).

NOTIFICATION REQUIREMENTS:

- A.** Pursuant to Article VI, Section 6.10(5), the permittee shall notify the Department within 24 hours of becoming aware that discharge monitoring is in violation of any permit limit. This notification shall be directed to the Industrial Waste Section at 585-753-7600 Option 4. The User shall also repeat sampling and analysis for the analyte in non-compliance and submit the results of the repeat analysis to Monroe County within 30 days after becoming aware of the violation.
- B.** Notify the Director in writing when considering a revision to the plant sewer system or any change in industrial waste discharges to the public sewers. The later encompasses either an increase or decrease in average daily volume or strength of waste or new wastes.
- C.** Notify the Director immediately of any accident, negligence, breakdown of pretreatment equipment or other occurrence that occasions discharge to the public sewer of any waste or process waters not covered by this permit.

SLUG CONTROL

An Industrial User shall be required to report any/all slug discharges to the Monroe County sewer system by calling 585-753-7600 option 4. For the purpose of this permit enclosure, a slug discharge shall be identified as any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge. Following a review process, the Control Authority (Monroe County) shall determine the applicability of a facility slug control plan. If the Control Authority decides that a Slug Discharge Control Plan (SDCP) is needed, the plan shall contain, at a minimum, the following elements:

1. Description of discharge practices, including non-routine batch discharges.
2. Description of stored chemicals.
3. Procedures for immediately notifying the Control Authority of slug discharges, including any discharge that would violate a prohibition under 40 CFR 403.5 (b), with procedures for follow up written notification within five (5) days.
4. If necessary, procedures to prevent adverse impact from accidental spills, including, but not limited to, inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents) and/or measures and equipment for emergency purposes.

SNC DEFINITION:

In accordance with 40 CFR 403.8 (f) (vii), an Industrial User is in significant noncompliance (SNC) if its violations meet one or more of the following criteria:

- A.** Chronic violations of wastewater discharge limits – defined as those which 66% or more of all the measurements taken during a six-month period exceed (by any magnitude) the daily maximum limit or the average limit for the same pollutant parameter (ref. Article IX, section 9.19 – MCSUL). This criteria does NOT apply to the following Monroe County surchargeable parameters: Biochemical Oxygen Demand, Total Suspended Solids, Chlorine Demand and Total Phosphorus.
- B.** Technical review criteria (TRC) violations – defined as those in which 33% or more of all the measurements for each pollutant parameter taken during a six month period equal or exceed the product of the daily maximum limit or the average limit times the applicable TRC (ref. Article IX, section 9.19 – MCSUL). This criteria does NOT apply to the following Monroe County surchargeable parameters: Biochemical Oxygen Demand, Total Suspended Solids, Chlorine Demand and Total Phosphorus.
- C.** Any other violation of a pretreatment effluent limit (daily maximum or longer-term average) that the Control Authority determines has caused, alone or in combination with other discharges, interference or pass-through (including endangering the health or POTW personnel or the general public).
- D.** Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or the environment or has resulted in the POTW's exercise of its emergency authority under paragraph (t)(1)(vi)(8) of 40 CFR part 403 to prevent such a discharge.
- E.** Failure to meet, within 90 days after the scheduled date, a compliance schedule milestone contained in a local control mechanism or enforcement order, for starting construction, completing construction or attaining final compliance.
- F.** Failure to provide, within 30 days after the due date, required reports such as BMRs, 90 day compliance reports, periodic reports on continued compliance.
- G.** Failure to accurately report noncompliance.
- H.** Any other violation or group of violations that the Control Authority determines will adversely affect the operation and implementation of the local Pretreatment Program.

PENALTIES

Should the facility be considered in Significant Non-Compliance (SNC), based on the above mentioned criteria, the minimum enforcement response by Monroe County will be the publication of the company name in the Gannett Rochester newspaper. The company will be published as an Industrial User in Significant Non-Compliance (SNC). Fines and criminal penalties may follow this publication (ref. Article IX – MCSUL).

Nothing in this permit shall be construed to relieve the permittees from civil/criminal penalties for noncompliance under Article IX, Section 9.7(a)(5) MCSUL. Article IX provides that any person who violates a permit condition is subject to a civil penalty not to exceed \$25,000 for any one case and an additional penalty not to exceed \$25,000 for each day of continued violation.



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

09/12/2019

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Insurance Solutions & Services, Inc. 619 Amboy Avenue Edison NJ 08837	CONTACT NAME: Jane Begreen PHONE (A/C, No, Ext): (732) 738-6080 FAX (A/C, No): (732) 738-6081 E-MAIL ADDRESS: jbegreen@issi-nj.com
INSURED Groundwater & Environmental Services, Inc. 415 Lawrence Bell Blvd, Suite Williamsville NY 14221	INSURER(S) AFFORDING COVERAGE INSURER A: Great Divide Insurance Company INSURER B: INSURER C: INSURER D: INSURER E: INSURER F:

COVERAGES**CERTIFICATE NUMBER:** CL1961800740**REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
	COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:						EACH OCCURRENCE DAMAGE TO RENTED PREMISES (Ea occurrence) \$ MED EXP (Any one person) \$ PERSONAL & ADV INJURY \$ GENERAL AGGREGATE \$ PRODUCTS - COMP/OP AGG \$ Employee Benefits \$
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> NON-OWNED AUTOS ONLY						COMBINED SINGLE LIMIT (Ea accident) \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ Medical payments \$
	UMBRELLA LIAB <input type="checkbox"/> OCCUR EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED <input type="checkbox"/> RETENTION \$ 0						EACH OCCURRENCE \$ AGGREGATE \$ \$
A	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N <input checked="" type="checkbox"/> N	N/A	WCA2022992	07/01/2019	07/01/2020	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
						0	

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

CERTIFICATE HOLDER**CANCELLATION**

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Monroe County Department of Environmental Services
145 Paul Road, Building 1

Rochester

NY 14624

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STATE OF NEW YORK
WORKERS' COMPENSATION BOARD

CERTIFICATE OF NYS WORKERS' COMPENSATION INSURANCE COVERAGE

1a. Legal Name & Address of Insured (Use street address only) Groundwater & Environmental Services, Inc. 5 Technology Place Suite 4 East Syracuse, NY 13057 NYC TRACKING CODE 601456 Work Location of Insured (Only required if coverage is specifically limited to certain locations in New York State, i.e., a Wrap-Up Policy)	1b. Business Telephone Number of Insured 800-220-3068 1c. NYS Unemployment Insurance Employer Registration Number of Insured 83-51399 1d. Federal Employer Identification Number of Insured or Social Security Number 23-2335424
2. Name and Address of the Entity Requesting Proof of Coverage (Entity Being Listed as the Certificate Holder) Monroe County Department of Environmental Services Industrial Waste Section 145 Paul Road, Bldg.1 Rochester, NY 14624	3a. Name of Insurance Carrier Great Divide Insurance Company 3b. Policy Number of entity listed in box "1a" WCA202299212 3c. Policy effective period 7/1/2019 to 7/1/2020 3d. The Proprietor, Partners or Executive Officers are <input checked="" type="checkbox"/> included. (Only check box if all partners/officers included) <input type="checkbox"/> all excluded or certain partners/officers excluded.

This certifies that the insurance carrier indicated above in box "3" insures the business referenced above in box "1a" for workers' compensation under the New York State Workers' Compensation Law. **(To use this form, New York (NY) must be listed under Item 3A on the INFORMATION PAGE of the workers' compensation insurance policy).** The Insurance Carrier or its licensed agent will send this Certificate of Insurance to the entity listed above as the certificate holder in box "2".

The Insurance Carrier will also notify the above certificate holder within 10 days IF a policy is canceled due to nonpayment of premiums or within 30 days IF there are reasons other than nonpayment of premiums that cancel the policy or eliminate the insured from the coverage indicated on this Certificate. (These notices may be sent by regular mail.) Otherwise, this Certificate is valid for one year after this form is approved by the insurance carrier or its licensed agent, or until the policy expiration date listed in box "3c", whichever is earlier.

Please Note: Upon the cancellation of the workers' compensation policy indicated on this form, if the business continues to be named on a permit, license or contract issued by a certificate holder, the business must provide that certificate holder with a new Certificate of Workers' Compensation Coverage or other authorized proof that the business is complying with the mandatory coverage requirements of the New York State Workers' Compensation Law.

Under penalty of perjury, I certify that I am an authorized representative or licensed agent of the insurance carrier referenced above and that the named insured has the coverage as depicted on this form.

Approved by: Insurance Solutions & Services, Inc.
(Print name of authorized representative or licensed agent of insurance carrier)

Approved by: 
(Signature) 9/12/2019
(Date)

Title: Frank G. Jacobs, President

Telephone Number of authorized representative or licensed agent of insurance carrier: (732) 738-6080

Please Note: Only insurance carriers and their licensed agents are authorized to issue Form C-105.2. Insurance brokers are NOT authorized to issue it.



CERTIFICATE OF INSURANCE COVERAGE

DISABILITY AND PAID FAMILY LEAVE BENEFITS LAW

PART 1. To be completed by Disability and Paid Family Leave Benefits Carrier or Licensed Insurance Agent of that Carrier

1a. Legal Name & Address of Insured (use street address only) GROUNDWATER & ENVIRONMENTAL SERVICES INC. 5 TECHNOLOGY PLACE SUITE 4 EAST SYRACUSE, NY 13057 Work Location of Insured (Only required if coverage is specifically limited to certain locations in New York State, i.e., Wrap-Up Policy)	1b. Business Telephone Number of Insured 800-220-3068 1c. Federal Employer Identification Number of Insured or Social Security Number 232335424
2. Name and Address of Entity Requesting Proof of Coverage (Entity Being Listed as the Certificate Holder) Monroe County Department of Environmental Services Industrial Waste Section 145 Paul Road, Bldg. 1 Rochester, NY 14624	3a. Name of Insurance Carrier HARTFORD LIFE AND ACCIDENT 3b. Policy Number of Entity Listed in Box "1a" LNY324265 3c. Policy effective period 01-01-2019 to 12-31-2019
4. Policy provides the following benefits: <input checked="" type="checkbox"/> A. Both disability and paid family leave benefits. <input type="checkbox"/> B. Disability benefits only. <input type="checkbox"/> C. Paid family leave benefits only. 5. Policy covers: <input checked="" type="checkbox"/> A. All of the employer's employees eligible under the NYS Disability and Paid Family Leave Benefits Law. <input type="checkbox"/> B. Only the following class or classes of employer's employees:	

Under penalty of perjury, I certify that I am an authorized representative or licensed agent of the insurance carrier referenced above and that the named insured has NYS Disability and/or Paid Family Leave Benefits insurance coverage as described above.

Date Signed 01-03-2019

Elizabeth Tello

(Signature of Insurance carrier's authorized representative or NYS Licensed Insurance Agent of that Insurance carrier)

Telephone Number (212) 553-8074

Name and Title: Elizabeth Tello - Assistant Director, Statutory Services

IMPORTANT: If Boxes 4A and 5A are checked, and this form is signed by the insurance carrier's authorized representative or NYS Licensed Insurance Agent of that carrier, this certificate is **COMPLETE**. Mail it directly to the certificate holder.

If Box 4B, 4C or 5B is checked, this certificate is **NOT COMPLETE** for purposes of Section 220, Subd. 8 of the NYS Disability and Paid Family Leave Benefits Law. It must be mailed for completion to the Workers' Compensation Board, Plans Acceptance Unit, PO Box 5200, Binghamton, NY 13902-5200.

PART 2. To be completed by the NYS Workers' Compensation Board (Only if Box 4C or 5B of Part 1 has been checked)

State of New York Workers' Compensation Board

According to information maintained by the NYS Workers' Compensation Board, the above-named employer has complied with the NYS Disability and Paid Family Leave Benefits Law with respect to all of his/her employees.

Date Signed

By

(Signature of Authorized NYS Workers' Compensation Board Employee)

Telephone Number

Name and Title

Please Note: Only insurance carriers licensed to write NYS disability and paid family leave benefits insurance policies and NYS licensed insurance agents of those insurance carriers are authorized to issue Form DB-120.1. Insurance brokers are NOT authorized to issue this form.





Enclosure 1
Engineering Controls - Standby Consultant/Contractor Certification Form



Site Details		Box 1
Site No.	828120	
Site Name Carriage Cleaners-Brighton		
Site Address: 2101 Monroe Avenue Zip Code: 14618-		
City/Town: Brighton		
County: Monroe		
Site Acreage: 0.3		
Reporting Period: July 14, 2021 - July 1, 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. To your knowledge 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. To your knowledge 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. To your knowledge 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. To your knowledge 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? Commercial and Industrial	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Are all ICs/ECs 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 contact the DEC PM regarding the development of a Corrective Measures Work Plan to address these issues.		
_____ Signature of Standby Consultant/Contractor		_____ Date

Description of Institutional Controls

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
137.14-1-36	Jim Reitze, M.I.J. Enterprises, Inc.	Ground Water Use Restriction Landuse Restriction

Institutional controls in the form of an environmental easement (EE) are being used to impose land use restrictions and groundwater use restrictions at the site. The EE for this site was recorded on 3/27/13 in Monroe County as Document #201303271013, in Book 11235 and Pages 11-21.

Specifically, the environmental easement requires:

- (a) limiting the use and development of the property to commercial use (which the property is currently zoned), which will also permit industrial use;
- (b) land use restrictions will require proper worker protections during construction or excavation activities that would potentially cause a worker to contact contaminated soil, groundwater or soil vapor
- (c) compliance with the approved site management plan;
- (d) groundwater use restrictions will preclude the use of groundwater at the Site without prior notification and approval from NYSDEC;
- (e) restrictions related to soil, groundwater, and soil vapor will be implemented on the site property; and
- (f) the property owner to complete and submit to the Department a periodic certification of institutional and engineering controls.

The December 2012 Site management plan includes the following institutional and engineering controls:

- (a) management of site excavation activities to ensure that excavated soil will be tested, properly handled to protect the health and safety of workers and the nearby community, and will be properly managed in a manner acceptable to the Department;
- (b) continued evaluation of the potential for vapor intrusion for any buildings developed on the site, including provision for mitigation of any impacts identified;
- (c) continued operation and periodic evaluation of the sub-slab depressurization systems at the site (2111 Monroe Avenue) and at off-site properties;
- (d) monitoring of groundwater and soil vapor;
- (e) identification of any use restrictions on the site; and
- (g) provisions for the continued proper operation and maintenance of the components of the remedy.

The property owner is required to provide a periodic certification of institutional and engineering controls, prepared and submitted by a professional engineer or such other expert acceptable to the Department, until the Department notifies the property owner in writing that this certification is no longer needed. The environmental easement which will trigger periodic certifications can only be amended or extinguished by the Commissioner.

This submittal will:

- (a) contain certification that the institutional controls and engineering controls put in place are still in place and are either unchanged from the previous certification or are compliant with Department-approved modifications;
- (b) allow the Department access to the site; and
- (c) state that nothing has occurred that will impair the ability of the control to protect public health or the environment, or constitute a violation or failure to comply with the site management plan unless otherwise approved by the Department.

Description of Engineering Controls

Parcel

137.14-1-36

Engineering Control

Vapor Mitigation

There are currently three EC systems at the Site:

- (1) Asphalt and Concrete Cover System
- (2) SVE System
- (3) GWET System

(1) Asphalt and Concrete Cover System: Exposure to remaining contamination in soil at the Site is prevented by an asphalt and concrete cover system over the contaminated soils at the Site. Specifically, this cover system is comprised of a minimum of four to six inches of asphalt pavement and concrete building slabs. The extent of the cover system is documented in the ALTA/ASCM Land Title Survey.

(2) Soil Vapor Extraction System: The system was installed in 2011 and extracts soil gas through three of five wells at any one time. All of the VE wells are two-inch diameter polyvinyl chloride wells screened from 3.5 to 6.5 feet bgs. All of these wells are connected to an extraction blower. From the blower the vapors go through two 1000-pound carbon adsorbers.

(3) Groundwater Extraction System: The system was installed in 2011 and extracts groundwater through a submersible pump located in EW-1. EW-1 was installed in 2009 and is a six-inch diameter steel well, grouted into competent bedrock, with an open borehole down to 28 feet bgs. The well is connected to a diffused aera located on-site to remove volatile contaminants and then discharges to a nearby sanitary sewer outlet.

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 certification, including data and material prepared by previous contractors for the current certifying period, if any;
- 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



2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

- (a) the Institutional Control and/or 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) nothing has occurred that would constitute a failure to comply with the Site Management Plan, or equivalent if no Site Management Plan exists.

YES NO



IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and contact the DEC PM regarding the development of a Corrective Measures Work Plan to address these issues.

Signature of Standby Consultant/Contractor

Date

IC/EC CERTIFICATIONS

Professional Engineer Signature

I certify that all information in Boxes 2 through 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.

Mark Stelmack, PE

print name

at

MACTEC Engineering and Geology, P.C.
511 Congress Street
Portland, ME 04101

(print business address)

am certifying as a Professional Engineer.



Signature of Professional Engineer



9/6/22

Date

Enclosure 2

Certification Instructions

I. Verification of Site Details (Box 1 and Box 2):

Answer the "YES/NO" questions in the Verification of Site Details Section. The Engineering Standby Contractor may include handwritten changes and/or other supporting documentation, as necessary.

II. Certification of Institutional Controls/ Engineering Controls (Boxes 3, 4, and 5)

1. Review the listed IC/ECs, confirming that all existing controls are listed, and that all existing controls are still applicable. If there is a control that is no longer applicable the Engineering Standby Contractor should petition the Department separately to request approval to remove the control.

2. In Box 5, complete certifications for all Plan components, as applicable, by checking the corresponding checkbox.

3. If you cannot certify "YES" for each Control listed in Box 3 & Box 4, sign and date the form in Box 5. Attach supporting documentation that explains why the **Certification** cannot be rendered. The DEC PM should be contacted to begin development of a plan of proposed corrective measures and an associated schedule for completing the corrective measures, including detailed cost information in a proposed budget. Note that this **Certification** form must be submitted even if an IC or EC cannot be certified

If the Department concurs with the explanation, the proposed corrective measures, and the proposed schedule and budget, a letter authorizing the implementation of those corrective measures will be issued by the Department's Project Manager. Once the corrective measures are complete, a revised Periodic Review Report (with a signed IC/EC Certification) must be submitted which covers both the period for which a certification initially could not be provided and the ensuing time period until the correction measure was completed. This revised PRR should be submitted within 45 days after completion of the corrective measures to the Department. If the Department has any questions or concerns regarding the PRR and/or completion of the IC/EC Certification, the Project Manager will contact you.

III. IC/EC Certification by Signature (Box 6):

Where the site has Institutional and Engineering Controls, the certification statement in Box 6 must be completed by a Professional Engineer or Qualified Environmental Professional, as noted on the form.

If you certified "YES" for each Institutional and Engineering Control, please complete and sign the IC/EC Certification page.

IV. Certification Form Modifications

Changes to the Certification Form shall be discussed with the Project Manager prior to submission. Any approved changes must be made on the Certification Form provided by Site Control and supporting documentation or reasoning shall be attached.