

New York State Department of Environmental Conservation
Division of Environmental Remediation
Bureau of Technical Support

514018

ADDITIONS/CHANGES TO REGISTRY: SUMMARY OF APPROVALS

SITE NAME: **Former Air Force Plant No. 51**

DEC I.D. NUMBER **828156**

Current Classification **P**

Volunteer

Yes

No

Sign (7) below

Activity:

☐

Add as
Class

☒

Reclassify
to 2

☐

Delist
Category

☐

Modify

Approvals:

1. RHWRE Bart Putzig Reg 8

Yes

☒

No

☐

6-30-09

2. BEEI of NYSDOH

Yes

☒

No

☐

8-18-09 ^{signed} (received 8/24)

3. Robert Knizek Remedial Bureau E
Bureau Director

Yes

☒

No

☐

6-30-09

4. Site Control Section

Kelly A. Gorman

Date

8/31/09

5. Director

Andrew J. Hughes

Date

8/31/09

6. Assistant Division Director
(Required only for Class 2 sites)

John E. ...

Date

9/4/09

Completion Checklist for Registry Sites

Completed By:

Initials

Date

OWNER NOTIFICATION LETTER?

☒

WRB

9/1/09

ADJACENT PROPERTY OWNER NOTIFICATION LETTER?

☒

WRB

9/3/09

ENB / LEGAL NOTICE SENT? (For Deletion Only)

☐

COMMENTS SUMMARIZED / PLACE IN REPOSITORY?

☐

FINAL NOTIFICATION SENT TO OWNER? (For Deletion Only)

☐

New York State Department of Environmental Conservation

Division of Environmental Remediation

Bureau of Technical Support, 11th Floor

625 Broadway, Albany, New York 12233-7020

Phone: (518) 402-9553 • FAX: (518) 402-9595

Website: www.dec.ny.gov



Alexander B. Grannis
Commissioner

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 10, 2009

Mr. Louis Atkin
80 Steel Street
Rochester, NY 14606

Dear Mr. Atkin:

As mandated by Section 27-1305 of the Environmental Conservation Law (ECL), the New York State Department of Environmental Conservation (Department) must maintain a registry of all inactive disposal sites suspected or known to contain hazardous wastes. The ECL also mandates that this Department notify, by certified mail, the owner of all or any part of each site or area included in the Registry of Inactive Hazardous Waste Disposal Sites.

Our records indicate that you are the owner or part owner of the site listed **below**. Therefore, this letter constitutes notification of the inclusion of such site in the Registry of Inactive Hazardous Waste Disposal Sites in New York State. Once listed in the Registry, the site becomes subject to certain restrictions prescribed by provisions of 6 NYCRR Part 375. These regulations may be found at the following DEC website address:
<http://www.dec.ny.gov/regs/4373.html>.

DEC Site No.: 828156
Site Name: Former Air Force Plant No. 51
Site Address: 477 Dewey Avenue, Greece, NY 14612
Site Classification: 2

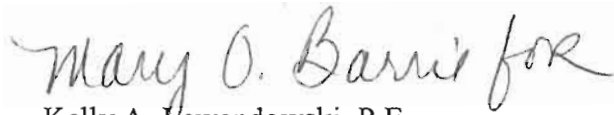
Enclosed is a copy of the Department's Inactive Hazardous Waste Disposal Site Report form as it will appear in the Registry. An explanation of the site classification is available at <http://www.dec.ny.gov/chemical/8663.html>. The Law allows the owner and/or operator of a site listed in the Registry to petition the Commissioner of the New York State Department of Environmental Conservation for deletion of such site, modification of site classification, or modification of any information regarding such site, by submitting a written statement setting forth the grounds of the petition.

Such petition may be addressed to:

Honorable Alexander B. Grannis
Commissioner
New York State Department of Environmental Conservation
625 Broadway
Albany, New York 12233-1010

For additional information, please contact Frank Sowers, the Project Manager, at 585-226-5357.

Sincerely,



Kelly A. Lewandowski, P.E.
Chief
Site Control Section

Enclosures

ec: w/o Enclosures
D. Desnoyers
D. Weigel
A. English
K. Lewandowski
M. Spath
W. Bayer
G. Litwin, NYSDOH
R. Knizek, Chief, Remedial Bureau E
J. Charles, Regional Attorney, Region 8
B. Putzig, RHWRE, Region 8
P. Lent, Regional Permit Administrator, Region 8



**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL
CONSERVATION
DIVISION OF ENVIRONMENTAL REMEDIATION
Inactive Hazardous Waste Disposal Report**



Site Code	828156			
Site Name	Former Air Force Plant No. 51	Address	4777 Dewey Avenue	
Classification	02	City	Greece	Zip 14612
Region	8	County	Monroe	Town Greece
Latitude	43 degrees, 15 minutes, 56.00 seconds			Estimated Size 33.6000
Longitude	-77 degrees, 38 minutes, 59.00 seconds			
Site Type	Structure			

Site Description

The Former Air Force Plant No. 51 (AFP51) site is located just north of the Lake Ontario State Parkway at 4777 Dewey Avenue in suburban area of the Town of Greece, Monroe County.

The main site features include several large and mid-size buildings surrounded by parking areas, roadways, and open fields. Access to a portion of the site is controlled by a fence.

The site is currently active and is zoned Light Industrial. The site is privately owned and is occupied by various commercial and light industrial businesses.

Surrounding land use consists of commercial and residential use to the east, undeveloped wooded upland areas to the south and wooded upland areas leading to wetlands and Round Pond Creek to the west. The Monroe County Water Authority Shoremont Treatment Plant is located north of the site.

The plant was originally built during WWII by the Odenbach Shipbuilding Corp. for the production of ocean-going ships. To launch the ships, a water-filled channel was dredged from the north end of the shipyard to Round Pond Creek. Today, the remaining portion of the channel is used by the Shoremont Treatment Plant as a settling pond for sediments from filter backwashing.

After the war, the plant was used by the Dept. of Defense for the production of B-52 bulkheads and the name of the facility was changed to Air Force Plant 51. Records indicate that the A.O. Smith Corporation and the American Machine and Foundry Company occupied the site in the 1950s. In 1959, the facility was declared excess by the U.S. government. From 1961 to 1963 the property was owned by the Monroe County Water Authority. Since 1963, the facility has been owned by corporate relatives of the current owner with space leased to a variety of businesses including scrap metal recycling and metal plating.

US Air Force contracts indicate that a plating operation was performed at the site prior to 1956 and that plating area rinse water drained to an on-site pond before flowing into Round Pond Creek. Other operations at the site that may have potentially contributed to site contamination include: discharges from acetylene gas production; a variety of maintenance activities including vehicle maintenance; underground gasoline storage tanks; above ground storage tanks; electrical transformers; heat treating; degreasing; laboratory activities; metal plating activities from tenant in the 1970s; discharges to septic systems; and discharges to the stormsewer system which discharges to Round Pond Creek. Other activities not specifically identified above may have also contributed to the contamination of the site.

In 2001, the current owner of the property entered the Voluntary Cleanup Program (VCP) to investigate and remediate chemical contamination related to the site. From 2001 to 2008, the owner completed a number of investigation and remediation activities, but, in January 2009, they determined that they could no longer afford the costs associated with investigation and remediation activities and ended their participation in the VCP. The site is now being addressed by DEC's Inactive Hazardous Waste Site Disposal program.

In 1999, the US Army Corps of Engineers (USACE) performed a limited environmental investigation at the site. The soils at the bottom of the on-site pond were contaminated with chlorinated solvents, cyanide, and various metals. Elevated levels of chlorinated compounds, cyanide, and various metals were also detected in the sediments in an adjacent wetland to the west near the discharge of the pond and the stormsewer system.

In 1999, USACE also performed an Interim Remedial Measure for the pond (IRM). Under the IRM, the pond water was pumped to tanks and disposed of off-site, sediments from the bottom of the pond were removed and properly disposed of off-site, and the pond was filled-in with clean soil. When the IRM was ended TCE contamination was still present in the sub-surface soils and groundwater under the former pond. As part of the VCP, the current owner defined the nature and extent of on-site contamination associated with

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the former pond and developed a cleanup plan. The owner then left the VCP before the cleanup could be implemented.

As part of the VCP, the owner also identified and investigated contamination associated with the former septic tanks, underground storage tanks, and the stormsewer system. Other areas of the site were identified as potentially contaminated, but the owners left the VCP before the all suspect areas were evaluated.

Cleanup activities that have taken place since 2001 include: changes to the stormwater system to reduce oily discharges to Round Pond Creek; proper off-site disposal of historic hazardous and solid wastes; extraction and proper off-site disposal of approximately 190 gallons of dense non-aqueous phase liquid (DNAPL) from below the former on-site pond; and removal of two underground gasoline storage tanks.

DEC is currently identifying and pursuing parties who are potentially responsible for the contamination so that they may implement a remedial program at the site.

Contaminants of Concern (Including Materials Disposed)	Quantity
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OU 01

TRICHLOROETHENE (TCE)
POLYCHLORINATED BIPHENYLS (PCB)
VINYL CHLORIDE
DICHOROETHYLENE
SILVER
CYANIDES(SOLUBLE CYANIDE SALTS)
CADMIUM
CHROMIUM
COPPER
LEAD
MERCURY
NICKEL
ZINC
BENZ(A)ANTHRACENE

Analytical Data Available for :	Groundwater, Surface Water, Soil, Sediment
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Applicable Standards Exceeded for:	Groundwater, Surface Water
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Site Environmental Assessment

A number of potentially contaminated areas have been identified at this site. Below is a summary of areas with documented contamination.

FORMER ON-SITE POND:

The former on-site pond area is located at the northwest portion of the site. Prior to the USACE's 1999 IRM, the primary contaminants of the pond were trichloroethene (TCE) and associated degradation products, cyanide, cadmium, chromium, copper, lead, nickel, and zinc.

After the USACE's IRM was complete, the primary contaminants remaining were TCE and associated degradation products in the soil and groundwater. TCE was found in the soils under the pond at a maximum concentration of 5,500 ppm at a depth of 14 to 16 feet, which significantly exceeds the soil cleanup objectives for the protection of groundwater (0.47 ppm).

DNAPL was also encountered during the site investigation and a second IRM was performed by the current owner which consisted of periodically pumping DNAPL that was accumulating in monitoring wells. From 2003 to 2008, approximately 190 gallons of DNAPL were recovered and properly disposed of off-site. TCE was the primary component of the DNAPL with a concentration of 250,000 ppm.

The DNAPL and soil contamination resulted in significant groundwater contamination as TCE and associated degradation products were found in the groundwater under the former on-site pond. On-site concentrations of TCE significantly exceed groundwater standards (5 ppb). Prior to the DNAPL removal IRM the maximum concentration of TCE in groundwater was 490,000 ppb and sum of TCE and degradation products was approximately 601,000 ppb. After the DNAPL removal IRM, the maximum concentration of TCE in source area groundwater decreased to 450 ppb and the sum of TCE and degradation products decreased to approximately 271,000 ppb, including 110,000 ppb of vinyl chloride (VC) and 160,000 ppb of cis-1,2-dichloroethene (cis-1,2-DCE).

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Groundwater concentrations decreased outside of the footprint of the former on-site pond, but TCE and associated degradation products were still present above groundwater standards at the northern, eastern, and western site boundaries. Groundwater in this part of the site was located at a depth of about 2 feet. Groundwater on the western side of the former pond generally flowed to the west toward Round Pond Creek, while groundwater on the eastern side of the former pond generally flowed to the east toward the former ship channel.

STORMSEWER SYSTEM

The main stormsewer system for the site consists of a series of interconnected catch basins that eventually discharges just beyond the northwest corner of the site into a wetland that is part of Round Pond Creek. This discharge location is also very close to where the former on-site pond drained into Round Pond Creek. The primary contaminants found in the catch basins were petroleum compounds, PCBs, and TCE and associated degradation compounds.

A visible petroleum sheen was present on the top of the water in some of the catch basins and at the discharge location. Catch basin redesign and adsorbent pads were used to control the discharge of the petroleum to the wetland until the source of the material could be identified.

A potential source is an area of visibly contaminated soils found near the northwest corner of the main building and adjacent to the stormsewer system at a depth of about 6-ft. These soils contained 334 ppm of total semi-volatile organic compounds, 64 ppm of cis-1,2-DCE and 46 ppm of VC.

The most contaminated catch basin is also located near the northwest corner of the main building, just a few feet north of the visibly contaminated soils discussed above. This is the final catch basin prior to discharge to the wetland. Catch basin sediments contained 1,100 ppm of TCE, 49 ppm of cis-1,2-DCE, and 13 ppm of PCBs. Higher levels of PCBs, up to 25 ppm, were found in the two catch basins immediately upstream.

The contaminated soils and catch basin sediments at the northwest corner of the building also appear to be a separate source of significant groundwater contamination. The primary groundwater contaminants in this area were TCE (up to 93,000 ppb) and cyanide (up to 6,140 ppb). The full nature and extent of this groundwater plume has not been defined.

OFF-SITE WETLAND

Surface water and sediment samples were collected from the wetland area near the discharge locations for the stormsewer system and former on-site pond. The full nature and extent of site-related contamination in the wetland and Round Pond Creek has not been defined.

Prior to the 1999 IRM, NYS surface water standards were exceeded for a number of inorganic compounds including: cadmium (up to 32 ppb), chromium (up to 305 ppb), copper (up to 5,970 ppb), lead (up to 7,680 ppb), mercury (up to 7.3 ppb), nickel (up to 776 ppb), zinc (up to 8,040 ppb), and cyanide (up to 58 ppb).

In the sediments, severe effect levels were exceeded for a number of inorganic compounds including: cadmium (up to 139 ppm), chromium (up to 230 ppm), copper (up to 682 ppm), lead (up to 989 ppm), nickel (up to 128 ppm), silver (up to 4.1 ppm), and zinc (up to 1,040 ppm).

Additionally, PCBs (up to 7.6 ppm) and benzo(a)anthracene (up to 3.8 ppm) exceeded the benthic aquatic chronic toxicity sediment criteria. TCE was also detected in the sediment at up to 4.6 ppm.

SEPTIC SYSTEM

Reports indicate that sewage and waste from the plant buildings were piped to a septic tank located west of the main plant area. Records indicate that the septic system was closed in the 1980s by filling it with sand.

The septic tank was located during VCP investigation. The tank is located in a wooded area on the far west side of the site about halfway between the north and south ends of the site. The septic tank was built into the side of a small hill so that the discharge from the tank migrated off-site by draining down the hill and eventually to a wetland that is part of Round Pond Creek. Overland migration from the base of the hill to the wetland was aided by two drainage swales.

Given that this area is an undeveloped woodland that leads to a wetland, soil sample results were compared to the soil cleanup objectives for the protection of ecological resources. The primary soil contaminants were PCBs and various metals. Moderate to significant soil impacts extended from the septic tank to the visible edge of the wetland and to a depth of approximately 6 feet. Maximum soil concentrations included PCBs (3.7 ppm), silver (697 ppm), trivalent chromium (471 ppm); and cadmium (20 ppm).

Groundwater in this area does not appear to be significantly affected.

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SIGNIFICANT THREAT

The site represents a significant threat to the environment due to (a) the historic and ongoing releases of contaminants from source areas (former on-site pond, soils near final catch basin) into groundwater which is migrating off-site; (b) the historic and ongoing releases of contaminants from source areas (soils near final catch basin, catch basin sediments) into off-site wetlands; and (c) the historic releases of contaminants to surface soil (septic system) into a woodland with the potential for ongoing releases via overland flow into a wetland.

DOCUMENT REPOSITORY

More information regarding the site can be found in the documents placed in the document repository for this site at the Greece Public Library located at 2 Vince Tofany Blvd in the Town of Greece, Monroe County.

Site Health Assessment

Exposures to contaminated groundwater are not expected because the area is served by public water. NYSDOH and NYSDEC will be evaluating the potential for soil vapor intrusion to enter into structures on or near the site and the potential for exposures to surface soil contamination.

Owners

Current Owner(s)

LOUIS ATKIN

NOT APPLICABLE

80 STEEL STREET

ROCHESTER

NY 14606

Previous Owner(s)

JON OWENS, ESQ

US ARMY CORPS OF ENGINEERS, BALTIMORE DISTRICT

PO BOX 1715

BALTIMORE

MD 21203-1715

Operators



New York State Department of Environmental Conservation

PUBLIC NOTICE

State Superfund Program

Site Name: Former Air Force Plant No. 51

September 30, 2009

Site No. 828156

Tax Map No. 046.01-1-2.1

Site Location: 4777 Dewey Avenue, Greece, Monroe County

Inactive Hazardous Waste Disposal Site Classification Notice

The Inactive Hazardous Waste Disposal Site Program (the State Superfund Program) is the State's program for identifying, investigating, and cleaning up sites where the disposal of hazardous waste may present a threat to public health and/or the environment. The New York State Department of Environmental Conservation (Department) maintains a list of these sites in the Registry of Inactive Hazardous Waste Disposal Sites (the "Registry"). The site identified above was recently *added to the Registry as a site that presents a significant threat to the environment as a Class 2 Site*). See map on other side for the location of the site.

The site represents a significant threat to the environment and public health with several areas of concern on and off site. Elevated concentrations of trichloroethene (TCE) and associated degradation products, heavy metals, and polychlorinated biphenyls (PCBs) have been detected in groundwater, soil and sediment at levels exceeding applicable standards and cleanup objectives. Specifically TCE has been detected in on-site groundwater as high as 93,000 parts per billion and in soil as high as 5,500 parts per million (ppm). In addition, PCBs have been detected in site storm sewer catch basins at 25ppm and in off-site wetland sediment at 7.6 ppm. Additional environmental investigations are needed both on-site and off-site to define the nature and extent of contamination as well as evaluate exposures to contamination due to the historic and ongoing releases of contamination from several source areas on-site.

The Department will keep you informed throughout the investigation and cleanup of the site.

If you own property adjacent to this site and are renting or leasing your property to someone else, please share this information with them. If you no longer wish to be on the contact list for this site or otherwise need to correct our records, please contact the Department's Project Manager listed below.

FOR MORE INFORMATION

Additional information about this site can be found using the Department's "Environmental Site Remediation Database Search" engine which is located on the internet at:
www.dec.ny.gov/cfm/x/xtapps/derexternal/index.cfm?pageid=3

Comments and questions are always welcome and should be directed as follows:

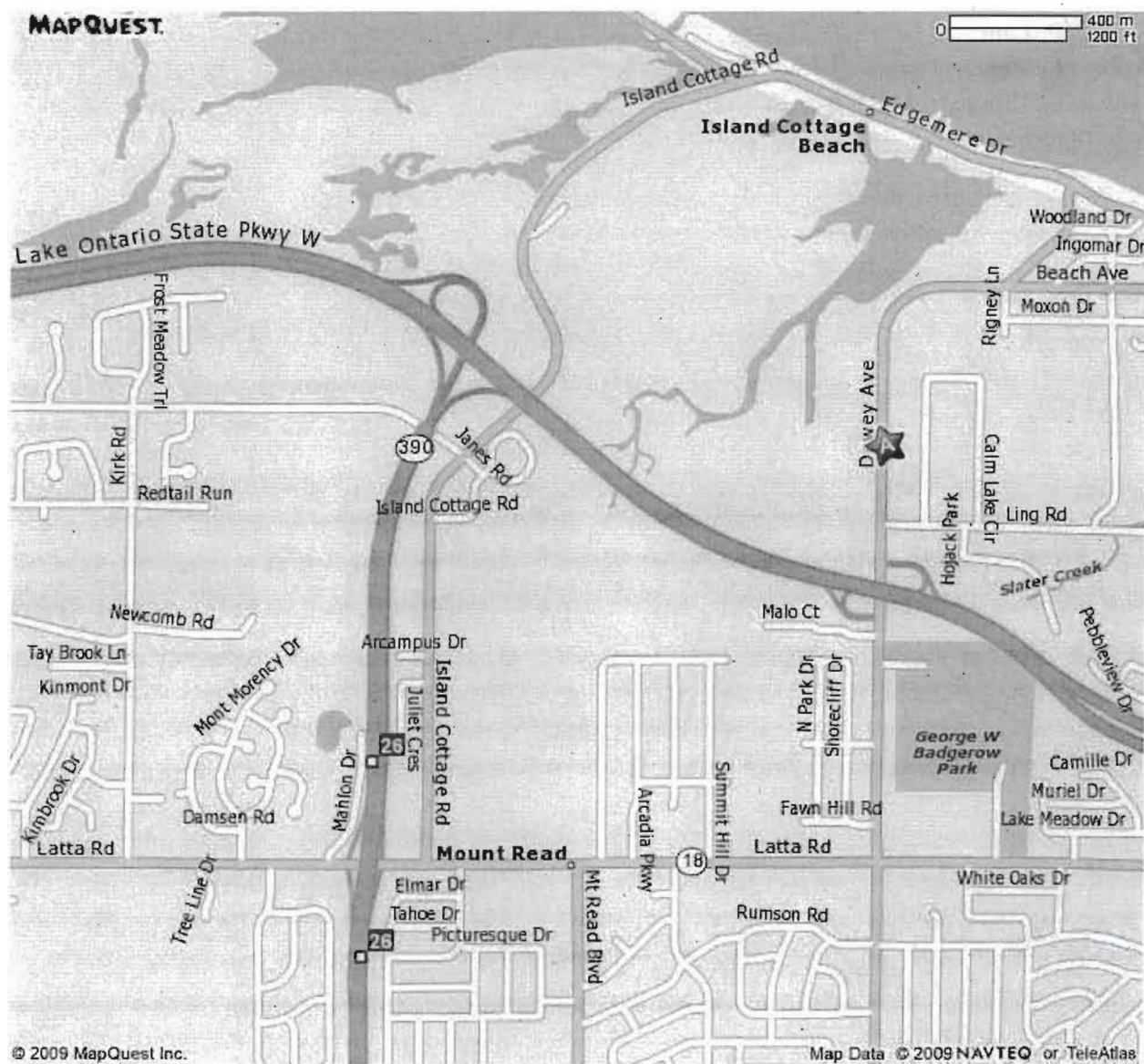
Project Related Questions

Frank Sowers
NYS DEC Region 8 Headquarters
6274 E. Avon-Lima Road
Avon, New York 14414

Phone No. 585-226-5357

The Department is sending you this notice in accordance with Environmental Conservation Law Article 27, Title 13 and its companion regulation (6 NYCRR 375-2.7(b)(6)(ii)) which requires the Department to notify all parties on the contact list for this site of this recent action.

Approximate Site Location
Former Air Force Plant No. 51
477 Dewey Avenue
Greece, NY 14612



Electronic copies:

D. Desnoyers
A. English
K. Lewandowski
R. Knizek
B. Putzig
P. Lent
L. Vera
G. Litwin, NYSDOH
L. Ennist
F. Sowers
W. Bayer

02-03-09



STATE OF NEW YORK DEPARTMENT OF HEALTH

Flanigan Square 547 River Street Troy, New York 12180-2216

Richard F. Daines, M.D.
Commissioner

Wendy E. Saunders
Executive Deputy Commissioner

August 18, 2009

Kelly Lewandowski, Chief
Site Control Section
Division of Environmental Remediation
NYS Dept. of Environmental Conservation
625 Broadway, 11th Floor
Albany, NY 12233-7011

RE: **Site Classification Package**
Former Air Force Plant No. 51
Site #828156
Greece (T), Monroe County

Dear Ms. Lewandowski:

Staff reviewed the June 30, 2009 classification package and supporting material for the Former Air Force Plant No. 51 site located in the Town of Greece, Monroe County. Based on that review, I understand that at several areas of concern on and off site, elevated concentrations of trichloroethene (TCE) and associated degradation products, heavy metals, and polychlorinated biphenyls (PCBs) have been detected in groundwater, soil and sediment at levels exceeding applicable standards and cleanup objectives. Specifically TCE has been detected in on-site groundwater as high as 93,000 parts per billion and in soil as high as 5,500 parts per million (ppm). In addition, PCBs have been detected in site soils at 13 ppm and in off-site wetland sediment at 7.6 ppm. Additional environmental investigations are needed to evaluate exposures to contamination both on and off site due to the historic and ongoing releases of contamination from several source areas on-site.

Based on the available information, I believe this site represents a significant threat to public health and concur with the recommendation to classify it as a Class 2 site on the Registry of Inactive Hazardous Waste Disposal sites. If you have any questions, please call Geoffrey Laccetti at (518) 402-7860.

Sincerely,

Steven M. Bates, Assistant Director
Bureau of Environmental Exposure Investigation

RECEIVED

AUG 24, 2009

**BUREAU OF
TECHNICAL SUPPORT**

ec: G. Anders Carlson, Ph.D. /A. Salame-Alfie, Ph.D.
G. Litwin / G. Laccetti/file
R. Knizek, NYSDEC
B. Putzig/ F. Sowers, NYSDEC Region 8
J. Kosmala, MCDH

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6/30/2009

**New York State Department of Environmental Conservation
Division of Environmental Remediation**

MEMORANDUM

TO: Kelly Lewandowski, Chief, Site Control Section, Bureau of Technical Support

FROM: Bart Putzig, Section Chief/RHWRE
Frank Sowers, Project Manager *File for BTR*

THRU: Robert Knizek, Director, BURE

SUBJECT: **Proposed Site Classification Change**

Site Name Former Air Force Plant No. 51

Site Code 828156

City Greece

County Monroe

Current Classification P

Proposed Classification 2

DATE: 6/30/2009

We propose that the classification of this site be changed as indicated above. Please initiate the review and concurrence process for this proposed change. Attached is a Site Classification Form that provides information regarding the site and the basis for the proposed change. Also attached is the support document (in PDF format) that provides a site map, the classification worksheet, and other supporting information.

Attachments

cc w/att: Robert Knizek, Director, BURE
Bart Putzig, Section Chief/RHWRE
Frank Sowers, Project Manager



NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF ENVIRONMENTAL REMEDIATION
Site Classification Form



6/30/2009

Site Code	828156	Site Name	Former Air Force Plant No. 51
City	Greece	Town	Greece
Region	8	County	Monroe
Current Classification	P	Proposed Classification	2
Estimated Size (acres)	33.60	Site Type	Structure
Significant Threat:	- Yes	- No	√ NA
Priority ranking Score	500	Project Manager	Frank Sowers

Site Description

The Former Air Force Plant No. 51 (AFP51) site is located just north of the Lake Ontario State Parkway at 4777 Dewey Avenue in suburban area of the Town of Greece, Monroe County. The main site features include several large and mid-size buildings surrounded by parking areas, roadways, and open fields. Access to a portion of the site is controlled by a fence. The site is currently active and is zoned Light Industrial. The site is privately owned and is occupied by various commercial and light industrial businesses. Surrounding land use consists of commercial and residential use to the east, undeveloped wooded upland areas to the south and wooded upland areas leading to wetlands and Round Pond Creek to the west. The Monroe County Water Authority Shoremont Treatment Plant is located north of the site.

The plant was originally built during WWII by the Odenbach Shipbuilding Corp. for the production of ocean-going ships. To launch the ships, a water-filled channel was dredged from the north end of the shipyard to Round Pond Creek. Today, the remaining portion of the channel is used by the Shoremont Treatment Plant as a settling pond for sediments from filter backwashing. After the war, the plant was used by the Dept. of Defense for the production of B-52 bulkheads and the name of the facility was changed to Air Force Plant 51. Records indicate that the A.O. Smith Corporation and the American Machine and Foundry Company occupied the site in the 1950s. In 1959, the facility was declared excess by the U.S. government. From 1961 to 1963 the property was owned by the Monroe County Water Authority. Since 1963, the facility has been owned by corporate relatives of the current owner with space leased to a variety of businesses including scrap metal recycling and metal plating. US Air Force contracts indicate that a plating operation was performed at the site prior to 1956 and that plating area rinse water drained to an on-site pond before flowing into Round Pond Creek. Other operations at the site that may have potentially contributed to site contamination include: discharges from acetylene gas production; a variety of maintenance activities including vehicle maintenance; underground gasoline storage tanks; above ground storage tanks; electrical transformers; heat treating; degreasing; laboratory activities; metal plating activities from tenant in the 1970s; discharges to septic systems; and discharges to the stormsewer system which discharges to Round Pond Creek. Other activities not specifically identified above may have also contributed to the contamination of the site.

In 2001, the current owner of the property entered the Voluntary Cleanup Program (VCP) to investigate and remediate chemical contamination related to the site. From 2001 to 2008, the owner completed a number of investigation and remediation activities, but, in January 2009, they determined that they could no longer afford the costs associated with investigation and remediation activities and ended their participation in the VCP. The site is now being addressed by DEC's Inactive Hazardous Waste Site Disposal program.

In 1999, the US Army Corps of Engineers (USACE) performed a limited environmental investigation at the site. The soils at the bottom of the on-site pond were contaminated with chlorinated solvents, cyanide, and various metals. Elevated levels of chlorinated compounds, cyanide, and various metals were also detected in the sediments in an adjacent wetland to the near the discharge of the pond and the stormsewer system. In 1999, USACE also performed an Interim Remedial Measure for the pond (IRM). Under the IRM, the pond water was pumped to tanks and disposed of off-site, sediments from the bottom of the pond were removed and properly disposed of off-site,



NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF ENVIRONMENTAL REMEDIATION
Site Classification Form



6/30/2009

Site Code 828156

Site Name Former Air Force Plant No. 51

and the pond was filled-in with clean soil. When the IRM was ended TCE contamination was still present in the sub-surface soils and groundwater under the former pond. As part of the VCP, the current owner defined the nature and extent of on-site contamination associated with the former pond and developed a cleanup plan. The owner then left the VCP before the cleanup could be implemented. As part of the VCP, the owner also identified and investigated contamination associated with the former septic tanks, underground storage tanks, and the stormsewer system. Other areas of the site were identified as potentially contaminated, but the owners left the VCP before the all suspect areas were evaluated.

Cleanup activities that have taken place since 2001 include: proper off-site disposal of historic hazardous and solid wastes; extraction and proper off-site disposal of approximately 190 gallons of dense non-aqueous phase liquid (DNAPL) from below the former on-site pond; and removal of two underground gasoline storage tanks. DEC is currently identifying and pursuing parties who are potentially responsible for the contamination so that they may implement a remedial program at the site.

Contaminants of Concern (Including Materials Disposed)

Quantity Disposed

OU 01	
TRICHLOROETHENE (TCE)	UNKNOWN
POLYCHLORINATED BIPHENYLS (PCB)	UNKNOWN
VINYL CHLORIDE	UNKNOWN
DICHLOROETHYLENE	UNKNOWN
SILVER	UNKNOWN
CYANIDES(SOLUBLE CYANIDE SALTS)	UNKNOWN
CADMIUM	UNKNOWN
CHROMIUM	UNKNOWN
COPPER	UNKNOWN
LEAD	UNKNOWN
MERCURY	UNKNOWN
NICKEL	UNKNOWN
ZINC	UNKNOWN
BENZ(A)ANTHRACENE	UNKNOWN

Analytical Data Available for : Groundwater, Surface Water, Soil, Sediment

Applicable Standards Exceeded for: Groundwater, Surface Water

Site Environmental Assessment

A number of potentially contaminated areas have been identified at this site. Below is a summary of areas with documented contamination.

FORMER ON-SITE POND: The former on-site pond area is located at the northwest portion of the site. Prior to the USACE's 1999 IRM, the primary contaminants of the pond were trichloroethene (TCE) and associated degradation products, cyanide, cadmium, chromium, copper, lead, nickel, and zinc. After the USACE's IRM was complete, the primary contaminants remaining were TCE and associated degradation products in the soil and groundwater. TCE was found in the soils under the pond at a maximum concentration of 5,500 ppm at a depth of 14 to 16 feet, which significantly exceeds the soil cleanup objectives for the protection of groundwater (0.47 ppm). DNAPL was also encountered during the site investigation and a second IRM was performed by the current owner which consisted of periodically pumping DNAPL that was accumulating in monitoring wells. From 2003 to 2008, approximately 190 gallons of DNAPL were recovered and properly disposed of off-site. TCE was the primary component of the DNAPL with a concentration of 250,000 ppm.



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Site Classification Form



6/30/2009

Site Code 828156

Site Name Former Air Force Plant No. 51

The DNAPL and soil contamination resulted in significant groundwater contamination as TCE and associated degradation products were found in the groundwater under the former on-site pond. On-site concentrations of TCE significantly exceed groundwater standards (5 ppb). Prior to the DNAPL removal IRM, the maximum concentration of TCE in groundwater was 490,000 ppb and sum of TCE and degradation products was approximately 601,000 ppb. After the DNAPL removal IRM, the maximum concentration of TCE in source area groundwater decreased to 450 ppb and the sum of TCE and degradation products decreased to approximately 271,000 ppb, including 110,000 ppb of vinyl chloride (VC) and 160,000 ppb of cis-1,2-dichloroethene (cis-1,2-DCE). Groundwater concentrations decreased outside of the footprint of the former on-site pond, but TCE and associated degradation products were still present above groundwater standards at the northern, eastern, and western site boundaries. Groundwater in this part of the site was located at a depth of about 2 feet. Groundwater on the western side of the former pond generally flowed to the west toward Round Pond Creek, while groundwater on the eastern side of the former pond generally flowed to the east toward the former ship channel.

STORMSEWER SYSTEM The main stormsewer system for the site consists of a series of interconnected catch basins that eventually discharges just beyond the northwest corner of the site into a wetland that is part of Round Pond Creek. This discharge location is also very close to where the former on-site pond drained into Round Pond Creek. The primary contaminants found in the catch basins were petroleum compounds, PCBs, and TCE and associated degradation compounds. A visible petroleum sheen was present on the top of the water in some of the catch basins and at the discharge location. Catch basin redesign and adsorbent pads were used to control the discharge of the petroleum to the wetland until the source of the material could be identified. A potential source is an area of visibly contaminated soils found near the northwest corner of the main building and adjacent to the stormsewer system at a depth of about 6-ft. These soils contained 334 ppm of total semi-volatile organic compounds, 64 ppm of cis-1,2-DCE and 46 ppm of VC. The most contaminated catch basin is also located near the northwest corner of the main building, just a few feet north of the visibly contaminated soils discussed above. This is the final catch basin prior to discharge to the wetland. Catch basin sediments contained 1,100 ppm of TCE, 49 ppm of cis-1,2-DCE, and 13 ppm of PCBs. Higher levels of PCBs, up to 25 ppm, were found in the two catch basins immediately upstream. The contaminated soils and catch basin sediments at the northwest corner of the building also appear to be a separate source of significant groundwater contamination. The primary groundwater contaminants in this area were TCE (up to 93,000 ppb) and cyanide (up to 6,140 ppb). The full nature and extent of this groundwater plume has not been defined.

OFF-SITE WETLAND Surface water and sediment samples were collected from the wetland area near the discharge locations for the stormsewer system and former on-site pond. The full nature and extent of site-related contamination in the wetland and Round Pond Creek has not been defined. Prior to the 1999 IRM, NYS surface water standards were exceeded for a number of inorganic compounds including: cadmium (up to 32 ppb), chromium (up to 305 ppb), copper (up to 5,970 ppb), lead (up to 7,680 ppb), mercury (up to 7.3 ppb), nickel (up to 776 ppb), zinc (up to 8,040 ppb), and cyanide (up to 58 ppb). In the sediments, severe effect levels were exceeded for a number of inorganic compounds including: cadmium (up to 139 ppm), chromium (up to 230 ppm), copper (up to 682 ppm), lead (up to 989 ppm), nickel (up to 128 ppm), silver (up to 4.1 ppm), and zinc (up to 1,040 ppm). Additionally, PCBs (up to 7.6 ppm) and benzo(a)anthracene (up to 3.8 ppm) exceeded the benthic aquatic chronic toxicity sediment criteria. TCE was also detected in the sediment at up to 4.6 ppm.

SEPTIC SYSTEM Reports indicate that sewage and waste from the plant buildings were piped to a septic tank located west of the main plant area. Records indicate that the septic system was closed in the 1980s by filling it with sand. The septic tank was located during VCP investigation. The tank is located in a wooded area on the far west side of the site about halfway between the north and south ends of the site. The septic tank was built into the side of a small hill so that the discharge from the tank migrated off-site by draining down the hill and eventually to a wetland that is part of Round Pond Creek. Overland migration from the base of the hill to the wetland was aided by two drainage swales. Given that this area is an undeveloped woodland that leads to a wetland, soil sample results were compared to the soil cleanup objectives for the protection of ecological resources. The primary soil



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DIVISION OF ENVIRONMENTAL REMEDIATION
Site Classification Form



6/30/2009

Site Code 828156 **Site Name** Former Air Force Plant No. 51

contaminants were PCBs and various metals. Moderate to significant soil impacts extended from the septic tank to the visible edge of the wetland and to a depth of approximately 6 feet. Maximum soil concentrations included PCBs (3.7 ppm), silver (697 ppm), trivalent chromium (471 ppm); and cadmium (20 ppm). Groundwater in this area does not appear to be significantly affected.

SIGNIFICANT THREAT The site represents a significant threat to the environment due to (a) the historic and ongoing releases of contaminants from source areas (former on-site pond, soils near final catch basin) into groundwater which is migrating off-site; (b) the historic and ongoing releases of contaminants from source areas (soils near final catch basin, catch basin sediments) into off-site wetlands; and (c) the historic releases of contaminants to surface soil (septic system) into a woodland with the potential for ongoing releases via overland flow into a wetland.

DOCUMENT REPOSITORY More information regarding the site can be found in the documents placed in the document repository for this site at the Greece Public Library located at 2 Vince Tofany Blvd in the Town of Greece, Monroe County.

Site Health Assessment

Exposures to contaminated groundwater are not expected because the area is served by public water. NYSDOH and NYSDEC will be evaluating the potential for soil vapor intrusion to enter into structures on or near the site and the potential for exposures to surface soil contamination.

Remedy Description and Cost

Remedy Description for Operable Unit 01

Total Cost

OU

Site Management Plan Approval:

Status:



NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF ENVIRONMENTAL REMEDIATION
Site Classification Form



6/30/2009

Site Code 828156 **Site Name** Former Air Force Plant No. 51

Basis for Classification Change

Listing was deferred while a remedial program was being implemented under a VCA. The VCA was terminated by the Volunteer in Jan. 2009. As discussed above, the site represents a significant threat to the environment due to releases of contaminants from source areas into groundwater, woodlands, and wetlands.

On-site soil concentrations of chlorinated solvents are significant. Maximum soil concentrations include: TCE (5,500 ppm), cis-1,2-DCE (64 ppm), and VC (46 ppm). Protection of groundwater SCOs are 0.47 ppm, 0.25 ppm, and 0.02 ppm, respectively. The soil contamination resulted in groundwater contamination that is migrating off-site. DNAPL is also present.

On-site PCBs (up to 25 ppm) in the stormsewer system are significant. Elevated PCBs (up to 7.6 ppm or 85.8 mg/kg TOC) in off-site wetland sediments near the stormsewer outfall indicate releases of PCBs to the environment. The chronic toxicity criteria for PCBs in sediments is 9 mg/kg TOC.

Significant ecological impacts from septic tank discharges to woodland soils were documented as PCB and metals concentrations exceeding the Part 375 SCOs for the protection of ecological resources extended from the septic tank to the wetland. Silver was a primary metal contaminant with a maximum soil concentration of 697 ppm. The ecological protection SCO for silver is 2 ppm.

Supporting documentation references provided as an attachment.



NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF ENVIRONMENTAL REMEDIATION
Site Classification Form



6/30/2009

Site Code 828156

Site Name Former Air Force Plant No. 51

Organization Approval Dates:

SCS Distribution:

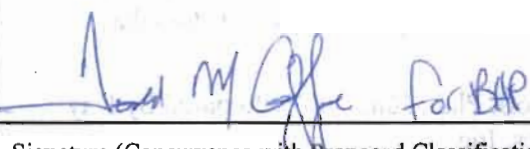

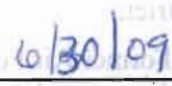
RHWRE:

CO Remedial Bureau:

DOH:

SCS Chief:

BTS BUR Dir.:

		
Signature (Concurrence with Proposed Classification)	Organization Title	Date

SUPPORTING DOCUMENTATION

- *1. Preliminary Scope of Work Site Investigation, Former Air Force Plant 51, September 1992. Prepared by Day Engineering, P.C.
- *2. Former Air Force Plant No. 51 HTRW Investigation, April 2000. Prepared by Ogden Environmental and Energy Services Co., Inc., for U.S. Army Corps of Engineers, New York District.
- *3. Former Air Force Plant No. 51, Interim Removal Action, Area 1 Completion Report, August 2001. Prepared by Roy F. Weston, Inc for U.S. Army Corps of Engineers, Omaha District.
- 4. Former Air Force Plant No. 51, Round Pond Sampling Collection and Analysis Report, August 2003. Prepared by Roy F. Weston, Inc for U.S. Army Corps of Engineers, Omaha District.
- *5. Former Air Force Plant 51 General Investigation Work Plan, June 2002. Prepared by Day Environmental, Inc. for 4800 Dewey Avenue Enterprises, Inc.
- 6. Former Air Force Plant 51 Environmental Site Investigation Report, Operable Unit 1, AOC1 (Former Plating Pond/Lagoon), AOC2 (Lagoon and Stormwater Outfalls), April 3, 2006. Prepared by Day Environmental, Inc. for 4800 Dewey Avenue Enterprises, Inc.
- 7. Former Air Force Plant 51 OU1 Remedial Work Plan, Operable Unit 1, AOC1 (Former Plating Pond/Lagoon), February 9, 2007. Prepared by Day Environmental, Inc. for 4800 Dewey Avenue, Inc.
- 8. Former Air Force Plant 51 OU1 Remedial Design Investigation Report, Operable Unit 1, AOC1 (Former Plating Pond/Lagoon), October 31, 2007. Prepared by Day Environmental, Inc. for 4800 Dewey Avenue, Inc.
- 9. Former Air Force Plant 51 Remedial Design Plan, Operable Unit 1, AOC1 (Former Plating Pond/Lagoon), June 25, 2008. Prepared by Day Environmental, Inc. for 4800 Dewey Avenue, Inc.
- 10. Former Air Force Plant 51 Interim Remedial Measure Report, Operable Unit 2, Area of Concern AOC6, May 2005. Prepared by Day Environmental, Inc. for 4800 Dewey Avenue Enterprises, Inc.
- 11. Former Air Force Plant 51 Environmental Site Investigation Report, Operable Unit 2, AOC4 (Stormwater System), AOC5 (Septic Systems), AOC6 (Underground Storage tanks), May 30, 2008. Prepared by Day Environmental, Inc. for 4800 Dewey Avenue, Inc. (NOTE: This report contains validated data for Operable Unit 2, but the report was not approved by DEC and the VCA was terminated prior to submittal of a revised report).

Note: Items marked with a "*" were NOT submitted electronically and are not in eDocs. All other items are in eDocs.



APPENDIX 2-2: SIGNIFICANT THREAT DETERMINATION WORKSHEET



X State Superfund Program
6 NYCRR 375-2.7

☐ Brownfield Cleanup Program
ECL 27-1411.1(c)

Site Name: Former Air Force Plant No. 51

Site ID No. 828156

City/Town: Town of Greece


County: Monroe

1. Has all available and relevant evidence regarding the Site been reviewed and the factors in 375-2.7(a)(3) considered?	<input checked="" type="checkbox"/> Yes (go to 2)	<input type="checkbox"/> No (stop)	<input type="checkbox"/> Unsure (stop)
2. Does Site contamination result in significant adverse impacts (375-2.7(a)(1)) to:			
a. species that are endangered, threatened, or of concern?	<input type="checkbox"/> Yes (go to b)	<input type="checkbox"/> No (go to b)	<input checked="" type="checkbox"/> Unsure (go to b)
b. protected streams, tidal/freshwater wetlands, or significant fish and wildlife habitat?	<input checked="" type="checkbox"/> Yes (go to c)	<input type="checkbox"/> No (go to c)	<input type="checkbox"/> Unsure (go to c)
c. flora or fauna from bioaccumulation or leads to a recommendation to limit consumption?	<input type="checkbox"/> Yes (go to d)	<input type="checkbox"/> No (go to d)	<input checked="" type="checkbox"/> Unsure (go to d)
d. fish, shellfish, crustacea, or wildlife from concentrations that cause adverse/chronic effects?	<input checked="" type="checkbox"/> Yes (go to e)	<input type="checkbox"/> No (go to e)	<input type="checkbox"/> Unsure (go to e)
e. the environment due to a fire, spill, explosion, or reaction that generates toxic gases, vapors, fumes, mists or dusts?	<input type="checkbox"/> Yes (go to f)	<input checked="" type="checkbox"/> No (go to f)	<input type="checkbox"/> Unsure (go to f)
f. areas where individuals or water supplies may be present and NYSDOH has determined there to be a significantly increased risk to public health (including from soil vapor)?	<input type="checkbox"/> Yes (go to 3)	<input type="checkbox"/> No (go to 3)	<input type="checkbox"/> Unsure (go to 3)
3. Does Site contamination result in significant environmental damage (375-2.7(a)(2))?	<input checked="" type="checkbox"/> Yes (go to 4)	<input type="checkbox"/> No (go to 4)	<input type="checkbox"/> Unsure (stop)
4. If any box in items 2 or 3 have been checked "Yes," the site presents a significant threat to public health or the environment; check here.	Significant threat to: <input type="checkbox"/> Public Health <input checked="" type="checkbox"/> Environment		
5. If no boxes in items 2 or 3 have been checked "Yes," the site does not present a significant threat to public health or the environment; check here.	<input type="checkbox"/> Not a Significant Threat		

Summary of Main Factors Contributing to this Determination:

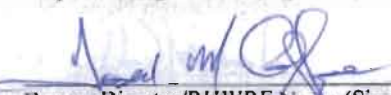
The site represents a significant threat to the environment due to (a) the historic and ongoing releases of contaminants from source areas (former on-site pond, soils near final catch basin) into groundwater which is migrating off-site; (b) the historic and ongoing releases of contaminants from source areas (soils near final catch basin, catch basin sediments) into off-site wetlands; and (c) the historic releases of contaminants to surface soil (septic system) into a woodland with the potential for ongoing releases via overland flow into a wetland.

Frank Sowers, P.E. - EF2
Project Manager Name/Title (Print)


Project Manager Name (Signature)

6/30/09
Date

Bartholomew H. Putzig, P.E. - RIWRE
Bureau Director/RIWRE Name/Title (Print)


Bureau Director/RIWRE Name (Signature)

6/30/09
Date



APPENDIX 2-1: SSF SITE CLASSIFICATION WORKSHEET

Site Name: Former Air Force Plant No. 51Site ID No. 828156City/Town: Town of GreeceCounty: Monroe

1. Has remediation been completed in accordance with a ROD including properly addressing institutional controls (ICs)?	<input type="checkbox"/> Yes (go to 7)	<input checked="" type="checkbox"/> No (go to 2)	
2. Has hazardous waste as defined in ECL §27-1301.1 been disposed at the Site?	<input checked="" type="checkbox"/> Yes (go to 3)	<input type="checkbox"/> No (stop)	<input type="checkbox"/> Unsure (go to 11)
3. Does the Site present a current or reasonably foreseeable significant threat to public health or the environment (complete Significant Threat Determination Worksheet)?	<input checked="" type="checkbox"/> Yes (go to 4)	<input type="checkbox"/> No (go to 6)	<input type="checkbox"/> Unsure (go to 11)
4. Is the significant threat causing or presenting an imminent danger of causing irreversible or irreparable damage to public health or the environment?	<input type="checkbox"/> Yes (Class 1)	<input checked="" type="checkbox"/> No (go to 5)	<input type="checkbox"/> Unsure (stop)
5. Is the Site presenting a significant but not imminent threat to public health or the environment?	<input checked="" type="checkbox"/> Yes (Class 2)	<input type="checkbox"/> No (reevaluate)	
6. Has hazardous waste been disposed but it does not present a significant threat to public health or the environment and the site is suitable for placement on the Registry?	<input type="checkbox"/> Yes (Class 3)	<input type="checkbox"/> No (go to 10)	
7. Is the site properly remediated but still requires continued active site management to maintain/achieve protectiveness?	<input type="checkbox"/> Yes (Class 4)	<input type="checkbox"/> No (go to 8)	<input type="checkbox"/> Unsure (stop)
8. Is the site properly remediated, does not require continued active site management, but is not suitable for delisting or a required IC is not yet in place?	<input type="checkbox"/> Yes (Class 5)	<input type="checkbox"/> No (go to 9)	<input type="checkbox"/> Unsure (stop)
9. Is the site properly remediated, required ICs are in place, the site does not require continued active site management, and is suitable for delisting?	<input type="checkbox"/> Yes (Class: C)	<input type="checkbox"/> No (go to 10)	<input type="checkbox"/> Unsure (stop)
10. Based upon investigation, is the degree of contamination such that the Site does not qualify to be placed on the Registry and that additional remedial work is not anticipated at this time?	<input type="checkbox"/> Yes (Class: N)	<input type="checkbox"/> No (reevaluate)	<input type="checkbox"/> Unsure (stop)
11. Does insufficient information exist to properly classify the site?	<input type="checkbox"/> Yes (Class P)	<input type="checkbox"/> No (reevaluate)	<input type="checkbox"/> Unsure (stop)

Current Classification: PProposed Classification: 2

Summary of Main Factors Contributing to this Determination: There is documented disposal of hazardous waste (F002-Spent Trichloroethene) at the site. Maximum soil concentrations include: TCE (5,500 ppm), cis-1,2-DCE (64 ppm), and VC (46 ppm). Protection of groundwater SCOs are 0.47 ppm, 0.25 ppm, and 0.02 ppm, respectively. The soil contamination resulted in groundwater contamination that is migrating off-site. DNAPL is also present. Additional site contaminants include metals, cyanide, petroleum compounds, and PCBs. See "Site Environmental Assessment," "Basis For Classification Change" and "Significant Threat" sections for details.

Frank Sowers, P.E. - EE2

Project Manager Name/Title - Print

Project Manager Name - Signature

Date

Bartholomew H. Putzig, P.E. - RHWRE

Bureau Director/RHWRE Name/Title - Print

Bureau Director/RHWRE Name - Signature

Date

11/25/08

PaulHastings

Paul, Hastings, Janofsky & Walker LLP
Park Avenue Tower
75 East 55th Street
First Floor
New York, NY 10022
telephone 212-318-6000 • facsimile 212-319-4090 • www.paulhastings.com

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Tokyo
Washington, DC

(212) 318-6555
davidfreeman@paulhastings.com

January 13, 2009

42481.00007

Mary Jane Peachey
NYSDEC
Division of Environmental Remediation
6274 East Avon-Lima Road
Avon, NY 14414-9519

Andrew J. English, P.E.
NYSDEC
Division of Environmental Remediation
50 Wolf Road
Albany, NY 12233-7010

Gary Litwin
Bureau of Environmental Exposure
Investigation
New York State Department of Health
Flanigan Square
547 River Street
Troy, NY 12180-2216

Glen R. Bailey
NYSDEC
Division of Environmental Enforcement
270 Michigan Avenue
Buffalo, NY 14203-2999

Re: Former Air Force Plant 51
4800 Dewey Avenue, Greece, New York
NYSDEC Site code #V00421-8
Site Index Number B8-0590-01-02

Dear Ms. Peachey and Messrs. Litwin, English and Bailey:

Pursuant to Paragraph XII of the above-referenced Voluntary Cleanup Agreement between 4800 Dewey Avenue Enterprises, Inc. (Volunteer) and the New York State Department of Environmental Conservation, please be advised that the Volunteer is withdrawing from the Voluntary Cleanup Program.

A copy of the transmittal letter so informing Joseph Hausbeck, Esq. is enclosed for your convenient reference.

Please feel free to contact me if you have any questions or would like to discuss further.

Sincerely,



David J. Freeman
of PAUL, HASTINGS, JANOFSKY & WALKER LLP

Enclosure

LEGAL_US_1: # 82354890.1

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(212) 318-6555
davidfreeman@paulhastings.com

January 13, 2009

42481.00007

Joseph Hausbeck, Esq.
Senior Attorney, Office of General Counsel, Western Field Unit
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, New York 14203

Re: Former Air Force Plant 51
4800 Dewey Avenue, Greece, New York
NYSDEC Site code #V00421-8
Site Index Number B8-0590-01-02

Dear Mr. Hausbeck:

This letter is in response to the December 18, 2008 letter received from Mr. Frank Sowers of the New York State Department of Environmental Conservation (NYSDEC). In that letter, Mr. Sowers sought additional information regarding the December 10, 2008 letter sent on behalf of 4800 Dewey Avenue (4800 Dewey) requesting a delay in the investigation and remediation work at the Former Air Force Plant 51 site (Site).

As you know, 4800 Dewey has participated in the New York State Voluntary Cleanup Program (VCP) since July 13, 2001. Since that time, 4800 Dewey has spent over \$1 million performing required investigation and remediation at the Site. Listed below is a summary of the work conducted by 4800 Dewey under the VCP.

- Performed a chemical material inventory, and characterized, removed and disposed off-site the inventoried materials that were abandoned and could no longer be used at the Site (e.g., glass containers of chlorextol/PCB transformer fluid).
- Sampled and analyzed liquids in abandoned wet-type electrical equipment (e.g., transformers and switches). Also sampled hard tar-like materials on some electrical equipment.
- Installed plastic sheeting and plywood on the floor of the former Power House (Building #8), boarded up the access door, and provided PCB signage on the building's exterior.

Joseph J. Hausbeck, Esq.
January 13, 2009
Page 2

- Drained and decommissioned abandoned wet-type electrical equipment.
- Evaluated the former buried main electrical system that feeds into the Power House.
- Performed investigative work at Operable Unit OU1 and Operable Unit OU2, including
 - Advancing about 70 test borings, 32 of which were converted into groundwater wells.
 - Collecting surface soil and/or near-surface soil samples at about 75 test locations.
 - Dye testing and video-taped select stormwater lines.
 - Collecting samples of water and sediments in select stormwater catch basins.
 - Analyzing over 300 samples of soil, groundwater, etc.
 - Preparing the required investigation-related work plans, including supplemental plans.
 - Conducting a geophysical survey to evaluate areas of suspected underground storage tanks.
 - Conducting about 37 test pits to evaluate areas of suspected underground storage tanks, former septic systems, stormwater system piping, and the entire length of a clay tile pipe that runs northwest of former Building #10.
 - Performing "Contained In" demonstrations on some of the study-derived wastes.
 - Removing two underground storage systems and contaminated soil as an interim remedial measure.
 - Surveying off-site drainage ditches in proximity to the former septic system located on the west side of the Site.
 - Performing data usability summary reports on project analytical laboratory test results as deemed necessary for the project goals.
- Installed a project sign at the Site.
- Collected and analyzed five off-site background surface soil samples.
- Developed Site Investigation reports for Operable Units OU1 and OU2. Performed an ecological assessment as part of the Operable Unit OU2 Investigation Report.

Joseph J. Hausbeck, Esq.
January 13, 2009
Page 3

- Conducted DNAPL monitoring and recovery at Operable Unit OU1 between July 2003 and September 2008. To date, a total of over 190 gallons of DNAPL have been recovered.
- Reviewed and provided comments on the Round Pond Sampling work plan and report that were developed by Weston Solutions, Inc. on behalf of the USACE.
- Developed a Remedial Work Plan and a Pilot Phase Remedial Design Plan for Operable Unit OU1, and completed a portion of the scope of work outlined in these plans (e.g., remedial design investigation, installation of 18 injection wells and 4 vent wells).

4800 has performed this work even though it is acknowledged by both NYSDEC and the U.S. Army Corps of Engineers that virtually all of the contamination is the result of activities of the U.S. Department of Defense (DoD), and its various constituent branches, during World War II and thereafter.

4800 Dewey is a small, family-owned business, which does not itself have the financial capacity to fund the remaining remediation required at the Site. Since entering into the Voluntary Cleanup Program, funds for the cleanup have come from 4800 Dewey's insurance policy. However, the funds from the policy are rapidly being depleted, and it is clear that they will not be sufficient to pay for a full cleanup of the Site.

Some time ago we advised you of this situation, and we suggested several alternatives to allow 4800 Dewey to continue on a long-term cooperative basis with NYSDEC to participate in the investigation and remediation of the Site, without bearing the full brunt of the remedial expenses. Among our suggestions was that NYSDEC involve DoD in Site activities immediately, either by demand letter or litigation, to share in or bear the costs of this work, which is rightfully its responsibility. We also proposed, alternatively, that 4800 Dewey take responsibility for certain Areas of Concern (AOCs), and that NYSDEC fund activities at other AOCs out of its own budget, without requiring 4800 Dewey to drop out of the VCP or having the Site listed on the New York State Registry of Inactive Hazardous Waste Disposal Sites (Registry). Regrettably, NYSDEC has indicated that it is unwilling to entertain these or other suggestions we have proposed.

Therefore, it is with great reluctance that we are hereby informing the NYSDEC that 4800 Dewey must drop out of the Voluntary Cleanup Program and have

Joseph J. Hausbeck, Esq.
January 13, 2009
Page 4

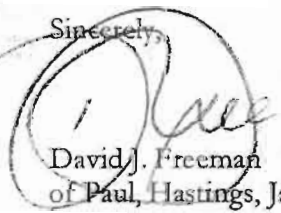
NYSDEC take over remediation at the Site. However, 4800 Dewey is willing to cooperate with the NYSDEC as it remediates the Site (e.g., providing access).

Also, we encourage NYSDEC, as we have throughout this process, to commence an enforcement action against the DoD, whose activities in the 1940's and 1950's contaminated the Site and caused the need for cleanup. 4800 Dewey will assist NYSDEC in its efforts to bring an action against DoD, including providing information regarding historical research of the Site and other documents or reports NYSDEC may need in pursuing DoD.

We continue to request that NYSDEC not list the Site on the Registry, which listing would create additional hardships for 4800 Dewey by making it more difficult to find tenants for unoccupied portions of the Site.

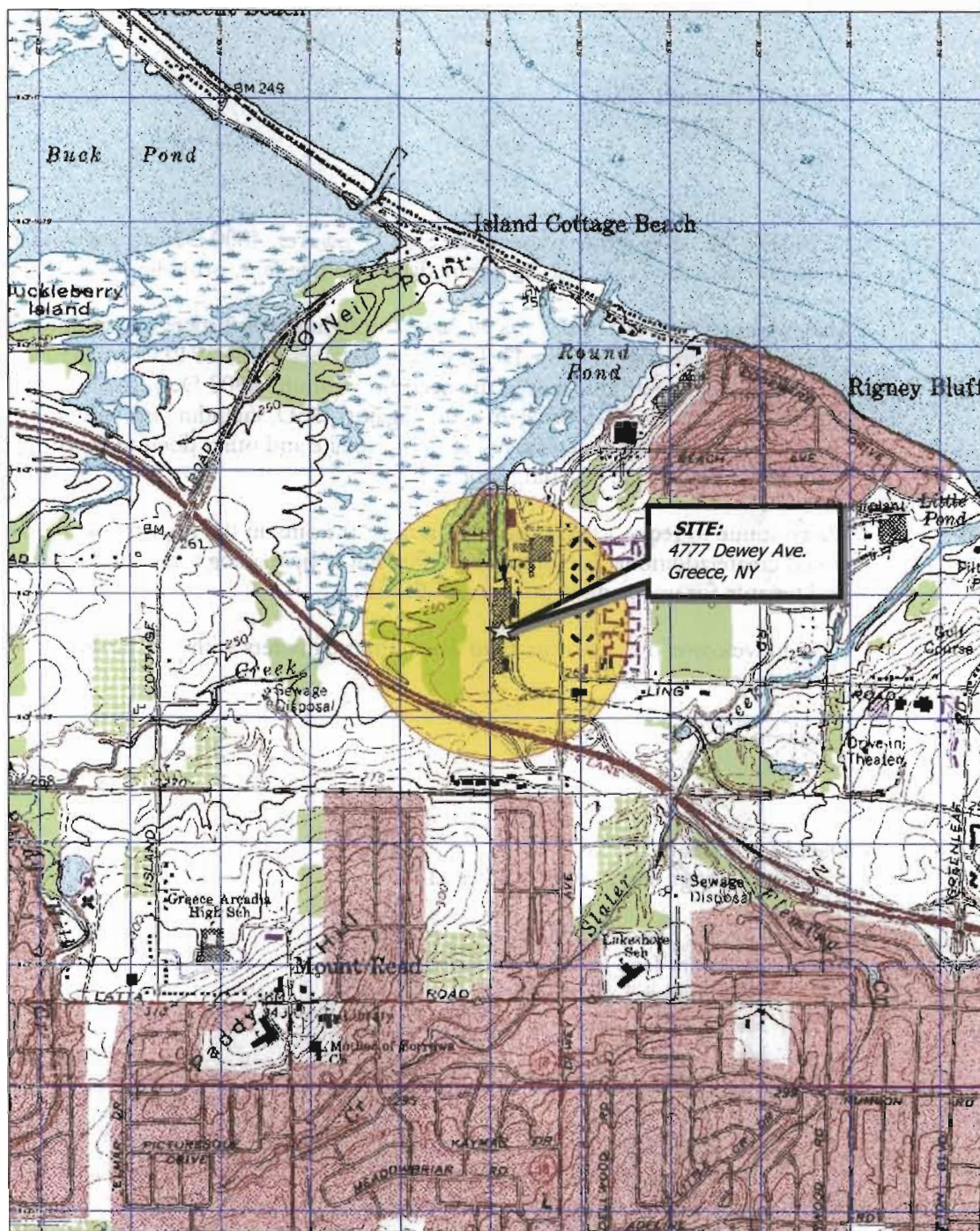
I would welcome the opportunity to discuss these matters with you further at your convenience.

Sincerely,



David J. Freeman
of Paul, Hastings, Janofsky & Walker LLP

cc: Dale A. Desnoyers, Esq.
Ms. Mary Jane Peachey
Mr. Andrew J. English
Mr. Gary Litwin
Mr. Glen R. Bailey
Mr. Frank Sowers
Mr. Louis Atkin
Mr. David Day
Mr. Jeffrey Danzinger
Laura Karvosky, Esq.



3-D TopoQuads Copyright © 1999 DeLorme Yarmouth, ME 04096 Source Data USGS
 544 ft Scale: 1:19,200 Detail 140 Datan: WGS84

Drawing Produced From: 3-D TopoQuads, DeLorme Map Co., referencing USGS quad maps Braddock Heights (NY) 1995 and Rochester East (NY) 1995. Site Lat/Long: N43d-15.94' - W77d-38.98'

DATE
 10/17/2005

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SCALE
 1" = 2000'



DAY ENVIRONMENTAL, INC.
 ENVIRONMENTAL CONSULTANTS
 ROCHESTER, NEW YORK 14614-1008

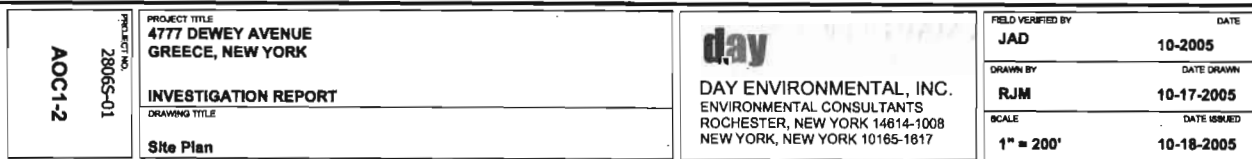
PROJECT TITLE
 4777 DEWEY AVENUE
 GREECE, NY

INVESTIGATION REPORT

DRAWING TITLE
 PROJECT LOCUS MAP

PROJECT NO.
 2806S-01

Figure
 AOC1-1





Former Air Force Plant 51 Site
4777 Dewey Avenue
Tax Parcel ID: 046.01-1-2.1

Not
Part of
Site

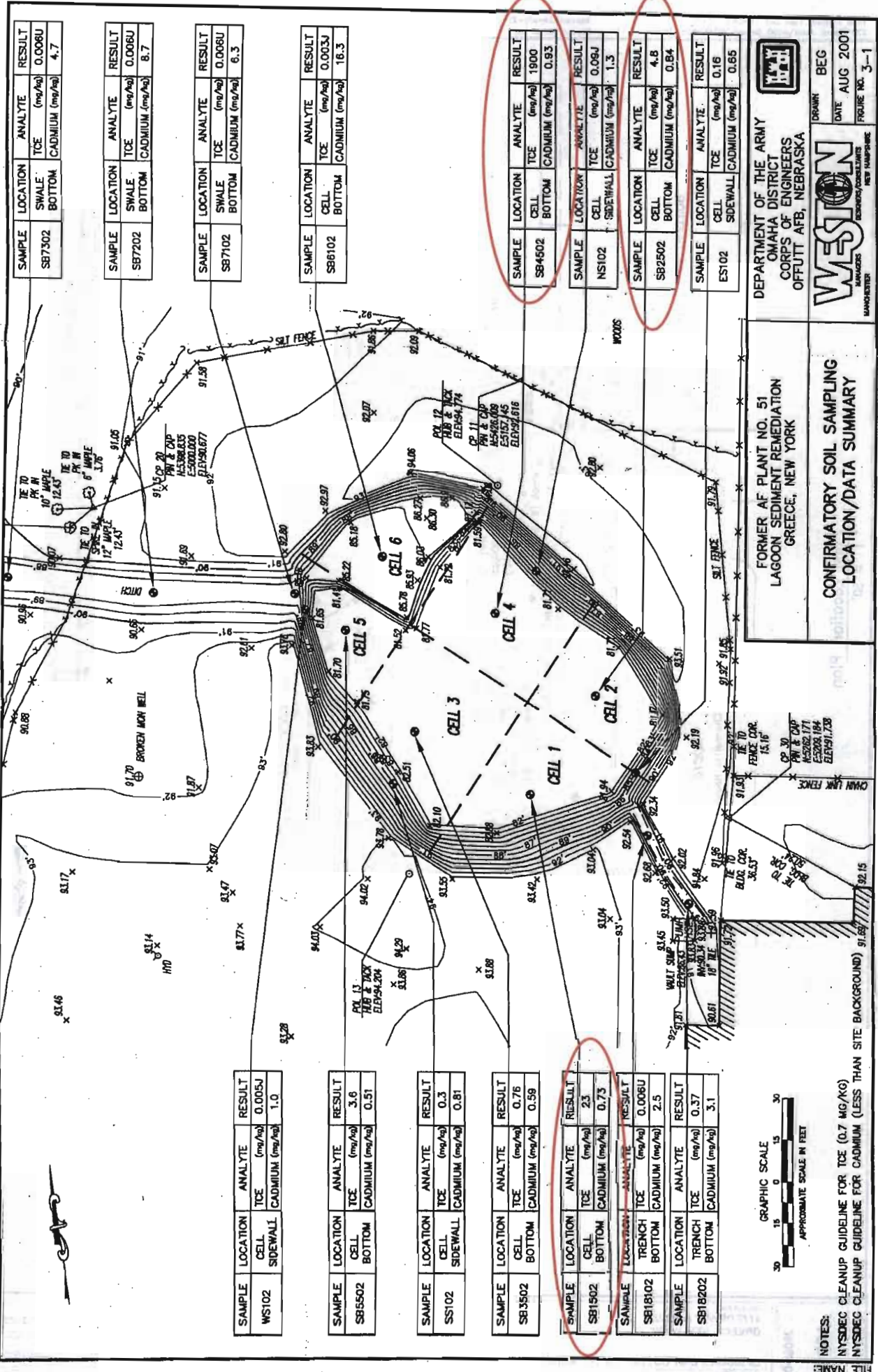
*Not Part of
Site
4771 Dewey
Avenue

SCALE

0 150 300 600 Feet

*4771 Dewey Ave was part of Air Force Plant 51, but is now a separate parcel. It is not part of the proposed Registry site as there is no data for this parcel. Drains from this building did connect to the septic tank located on 4777 Dewey Ave (the site) which is considered a source area.





DEPARTMENT OF THE ARMY
OMAHA DISTRICT
CORPS OF ENGINEERS
OFFUTT AFB, NEBRASKA

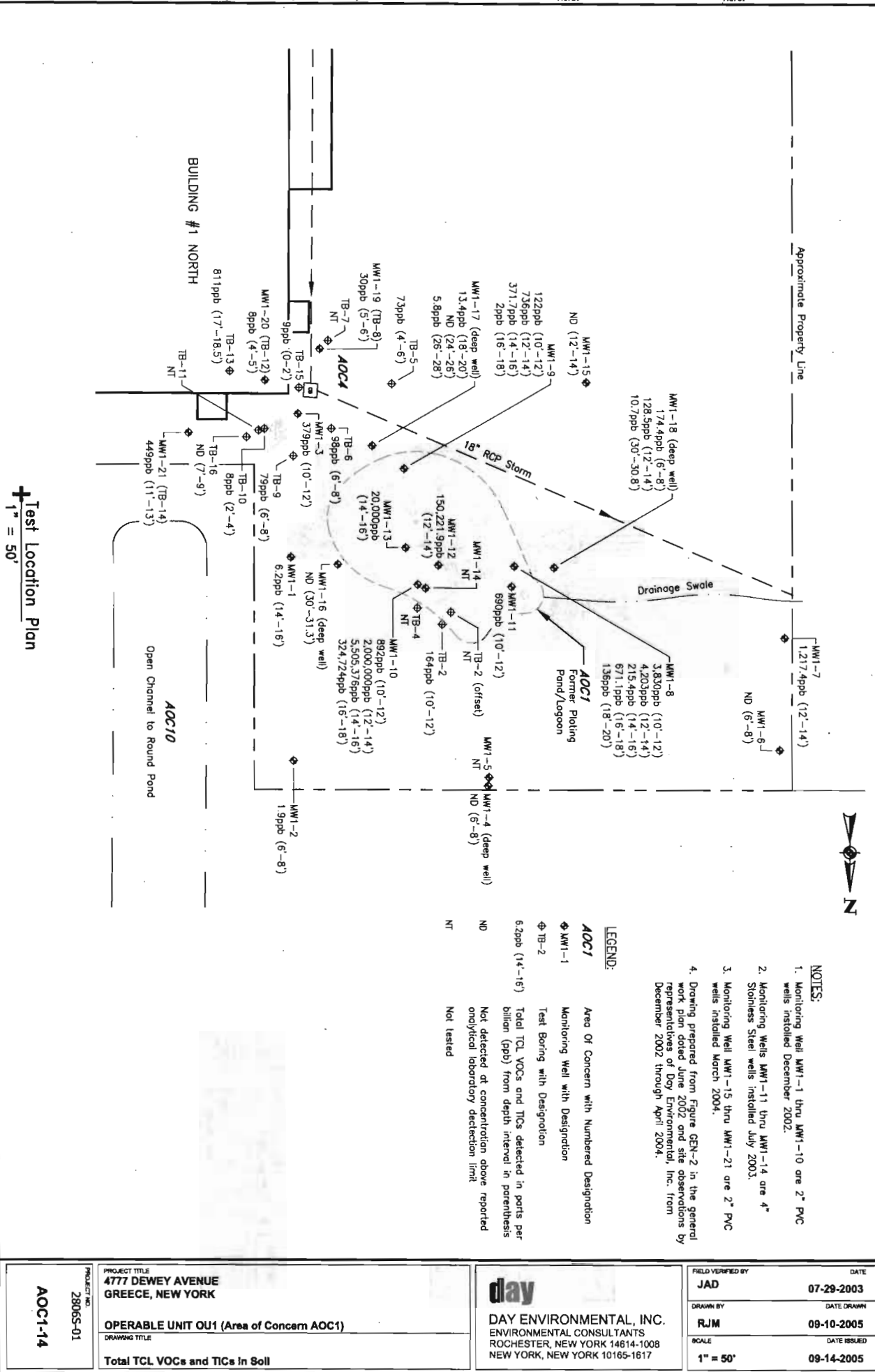
WESTON
ENGINEERS/CONSULTANTS
MANAGER

DATE AUG 2001
FIGURE NO. 3-1

FORMER AF PLANT NO. 51
LAGOON SEDIMENT REMEDIATION
GREECE, NEW YORK

CONFIRMATORY SOIL SAMPLING
LOCATION/DATA SUMMARY

NOTES:
NYSDEC CLEANUP GUIDELINE FOR TCE (0.7 MG/KG)
NYSDEC CLEANUP GUIDELINE FOR CADMIUM (LESS THAN SITE BACKGROUND)

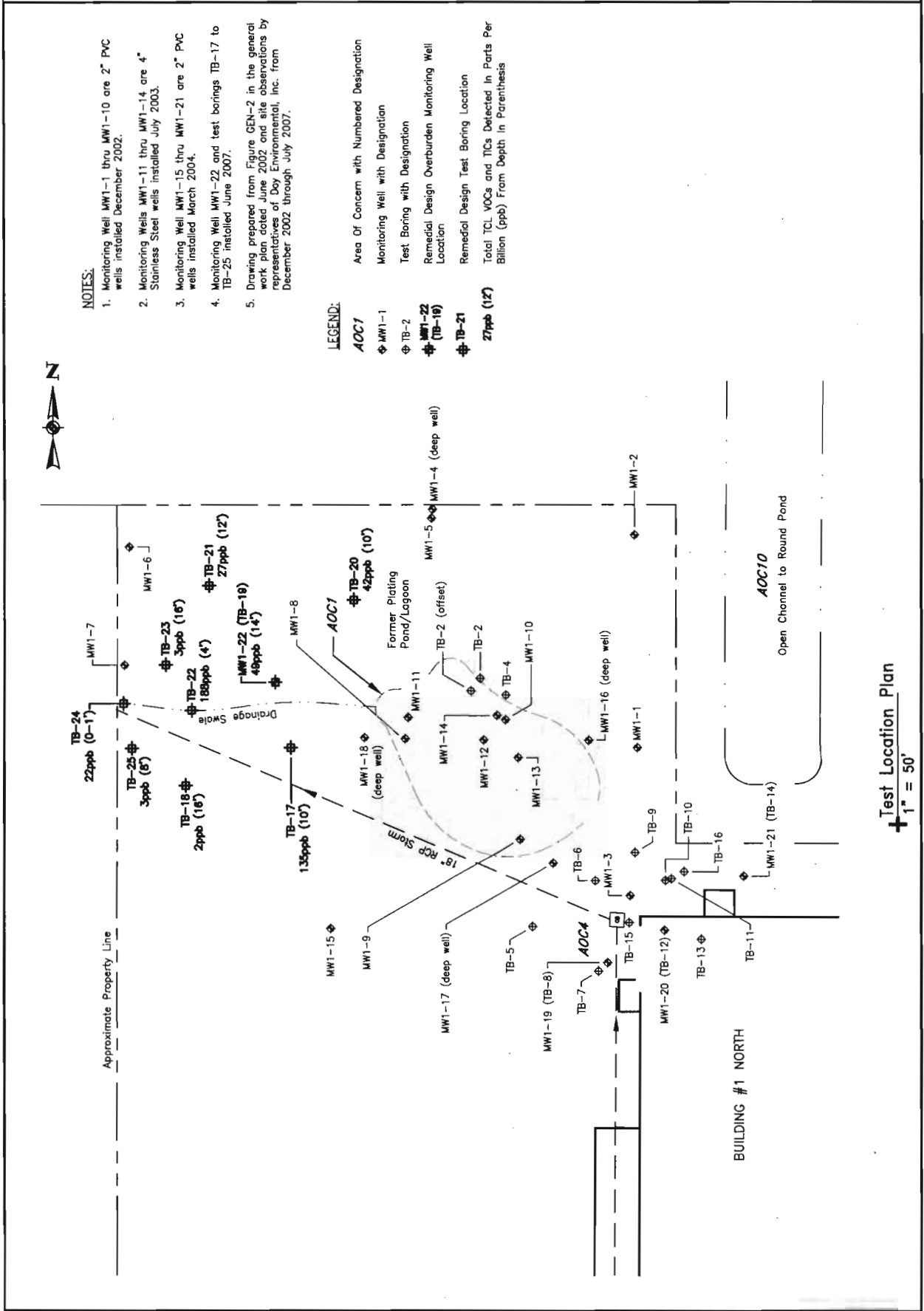


PROJECT TITLE 4777 DEWEY AVENUE GREECE, NEW YORK		FIELD VERIFIED BY JAD		DATE 07-29-2003
OPERABLE UNIT OU1 (Area of Concern AOC1)		DRAWN BY RJM		DATE DRAWN 09-10-2005
DRAWING TITLE Total TCL VOCs and TICs in Soil		SCALE 1" = 50'		DATE ISSUED 09-14-2005

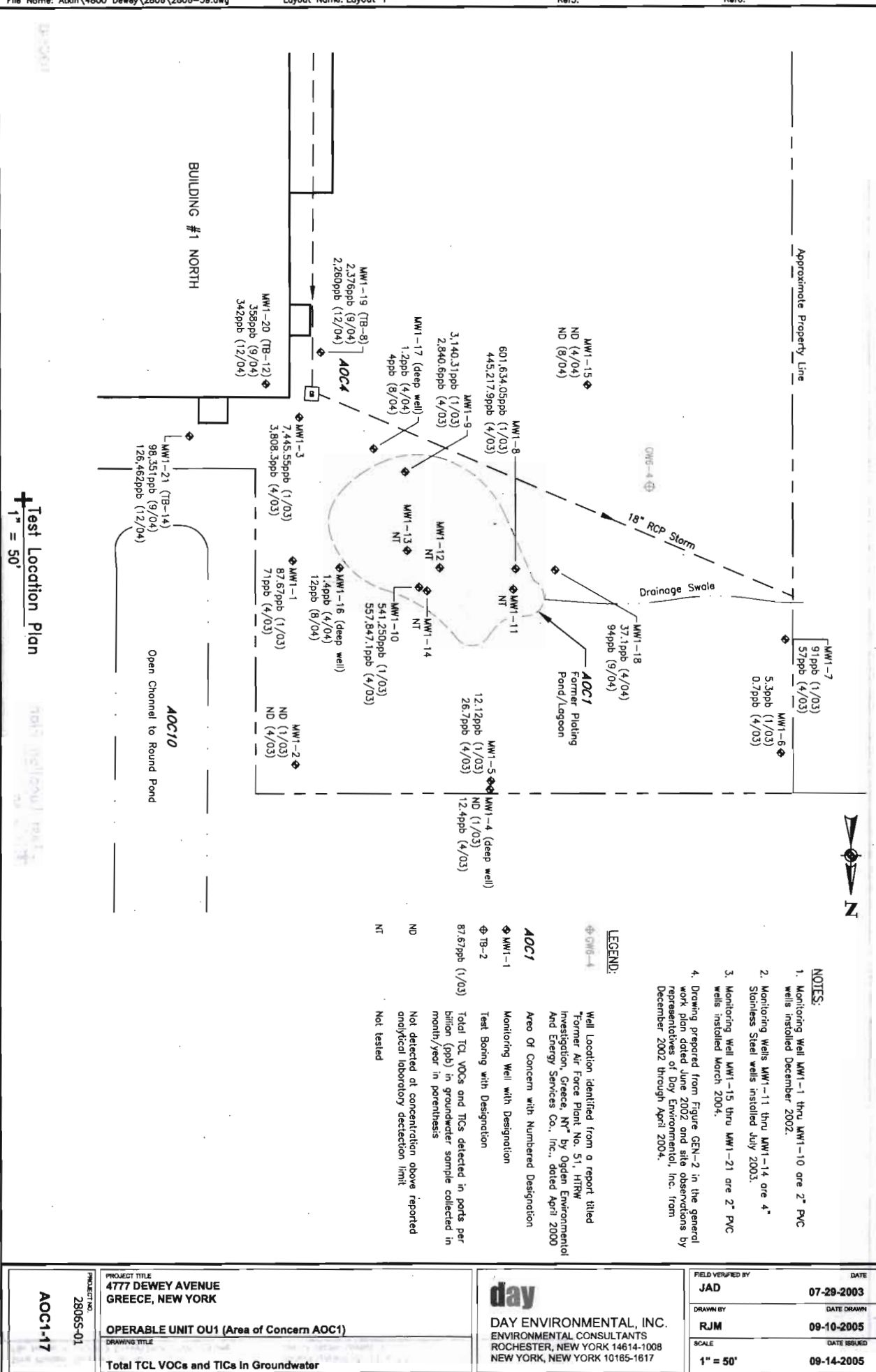
PROJECT NO.
2806S-01

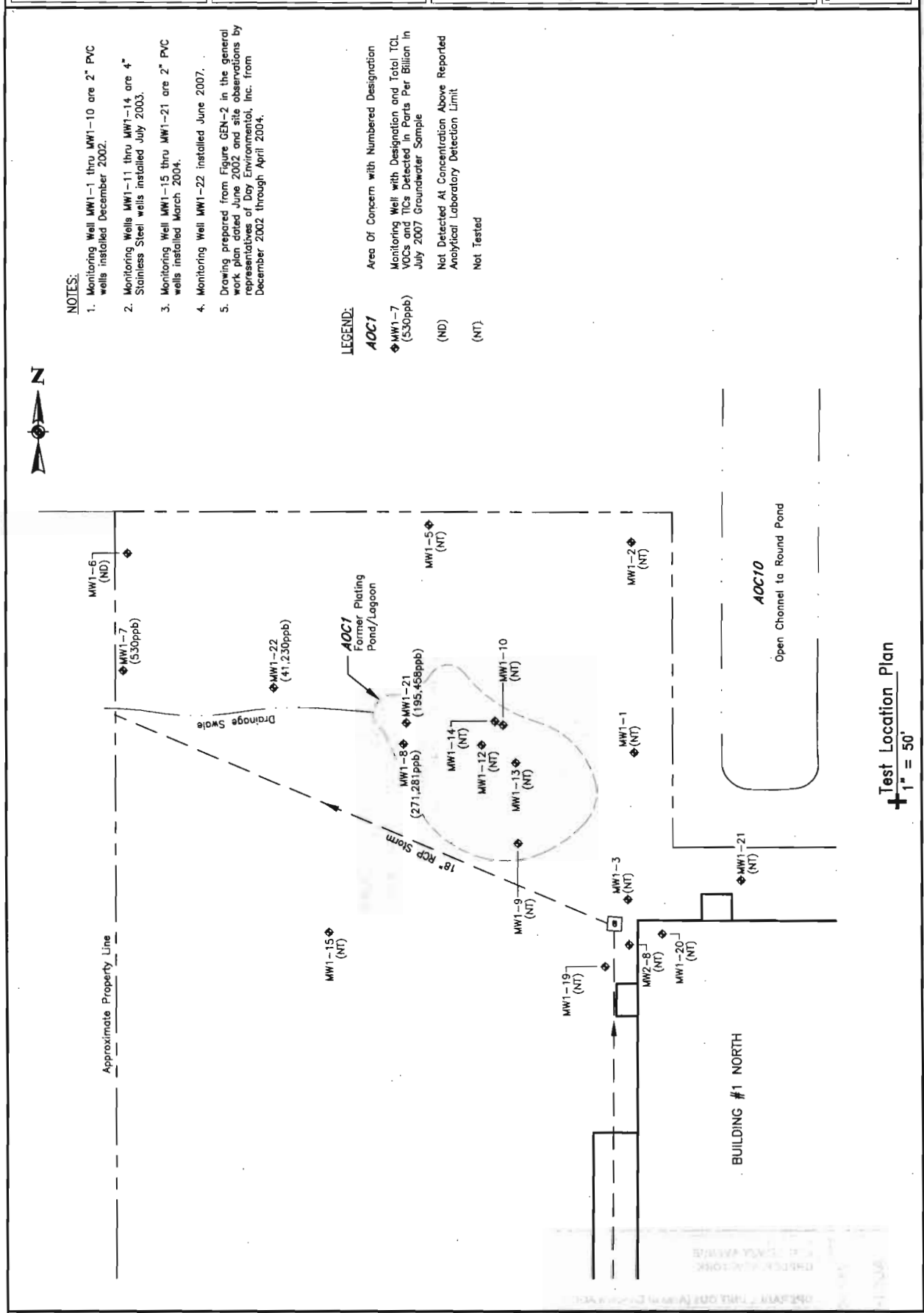
AOC1-14

day
 DAY ENVIRONMENTAL, INC.
 ENVIRONMENTAL CONSULTANTS
 ROCHESTER, NEW YORK 14614-1008
 NEW YORK, NEW YORK 10165-1617



Test Location Plan
 1" = 50'





NOTES:

- Monitoring Well MW1-1 thru MW1-10 are 2" PVC wells installed December 2002.
- Monitoring Wells MW1-11 thru MW1-14 are 4" Stainless Steel wells installed July 2003.
- Monitoring Well MW1-15 thru MW1-21 are 2" PVC wells installed March 2004.
- Monitoring Well MW1-22 installed June 2007.
- Drawing prepared from Figure GEN-2 in the general work plan dated June 2002 and site observations by representatives of Day Environmental, Inc. from December 2002 through April 2004.

LEGEND:

AOC1
 Area Of Concern with Numbered Designation

MW1-7
 Monitoring Well with Designation and Total TCL VOCs and TICs Detected in Parts Per Billion in July 2007 Groundwater Sample

(ND)
 Not Detected At Concentration Above Reported Analytical Laboratory Detection Limit

(NT)
 Not Tested

Table 6
Former Air Force Plant 51
4777 Dewey Ave., Greece, NY

Summary of Detected Volatile Organic Compounds
in ug/l or Parts per Billion (ppb)

OU1 Remedial Design Investigation
Baseline Groundwater Samples

Detected Compound	Groundwater Standards and Guidance Values ⁽¹⁾	276 MW1-6 (07/24/07)	278 MW1-7 (07/25/07)	279 MW1-22 (07/25/07)	280 MW1-8 (07/25/07)	281 MW1-11 (07/25/07)
Vinyl Chloride	2	U	110	2700 D	110000 D	44000 D
1,1-Dichloroethene	5	U	U	26	430 E	270 E
Methyl Acetate	NA	U	U	U	16	
Trans-1,2-Dichloroethene	5	U	3 J	97	420 E	450 E
1,1-Dichloroethane	5	U	410 D	U	4 J	4 J
Cis-1,2-Dichloroethene	5	U	U	32000 D	160000 D	150000 D
Benzene	1	U	U	U	2 J	
1,2-Dichloroethane	0.6	U	U	U	11	5 J
Trichloroethene	5	U	7 J	6400 D	55	450 E
4-Methyl-2-Pentanone	NA	U	U	U	30	6 J
Toluene	5	U	U	5 J	59	41
1,1,2-Trichloroethane	1	U	U	2 J	19	4 J
Ethylbenzene	5	U	U	U	2 J	
Xylene (total)	5	U	U	U	20	20
TOTAL VOCs	NA	U	530 JD	41230 JD	271068 JDE	195250 JDE
TOTAL TICs	NA	U	U	U	213 NJ	208 NJ
TOTAL VOCs AND TICs	NA	U	530 JD	41230 JD	271281 NJDE	195458 NJDE

NA = Not available J = Estimated value D = Compound concentration obtained from a diluted analysis

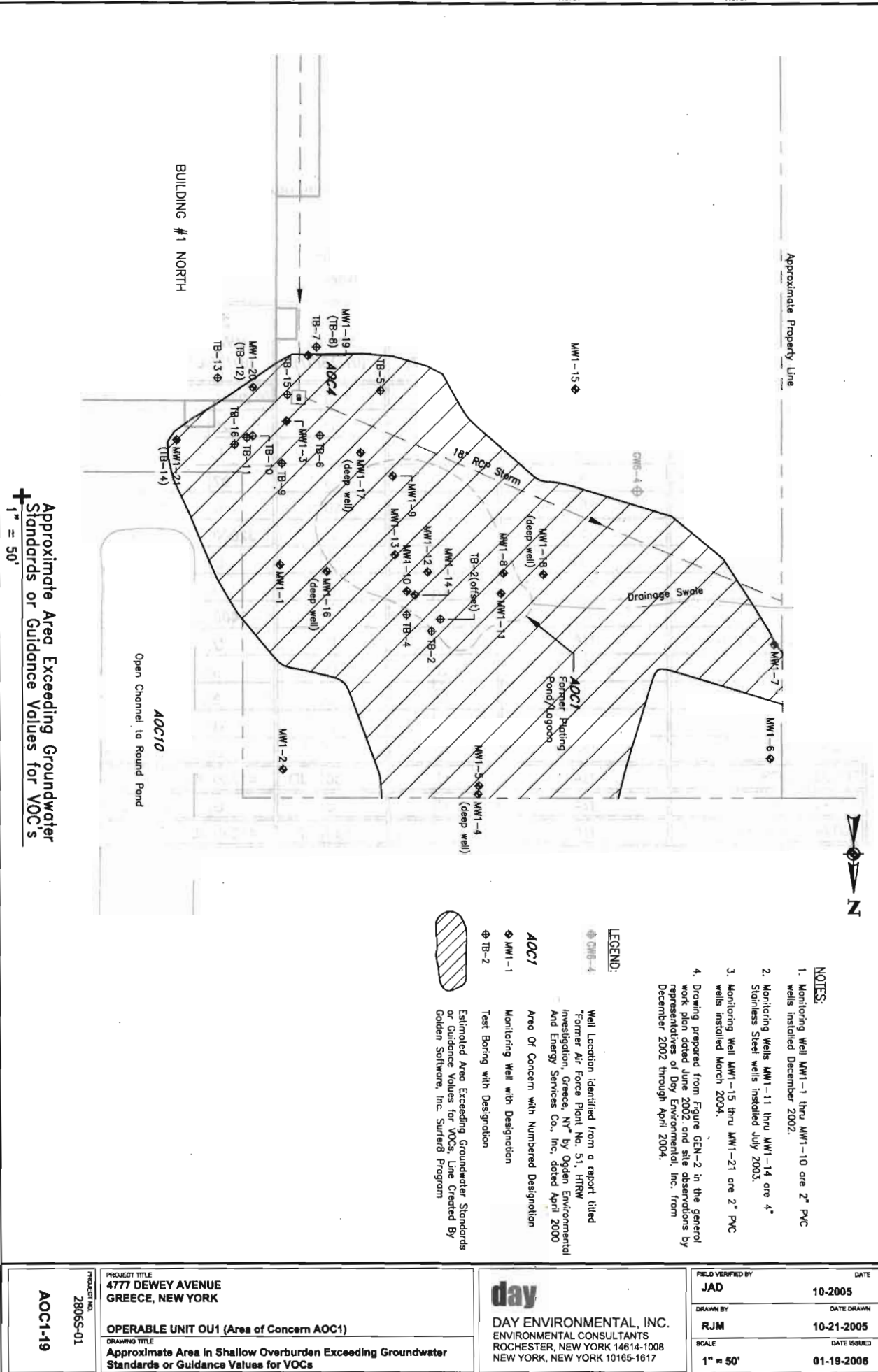
(1) = Groundwater standards and guidance values referenced in NYSDEC TOGS 1.1.1 dated June 1998 (as amended by an April 2000 addendum)


U = Not detected at concentration above reported analytical laboratory detection limit

E = Compound concentration exceeded the calibration range

N = Tentatively identified compound (TIC) is considered to be positively identified

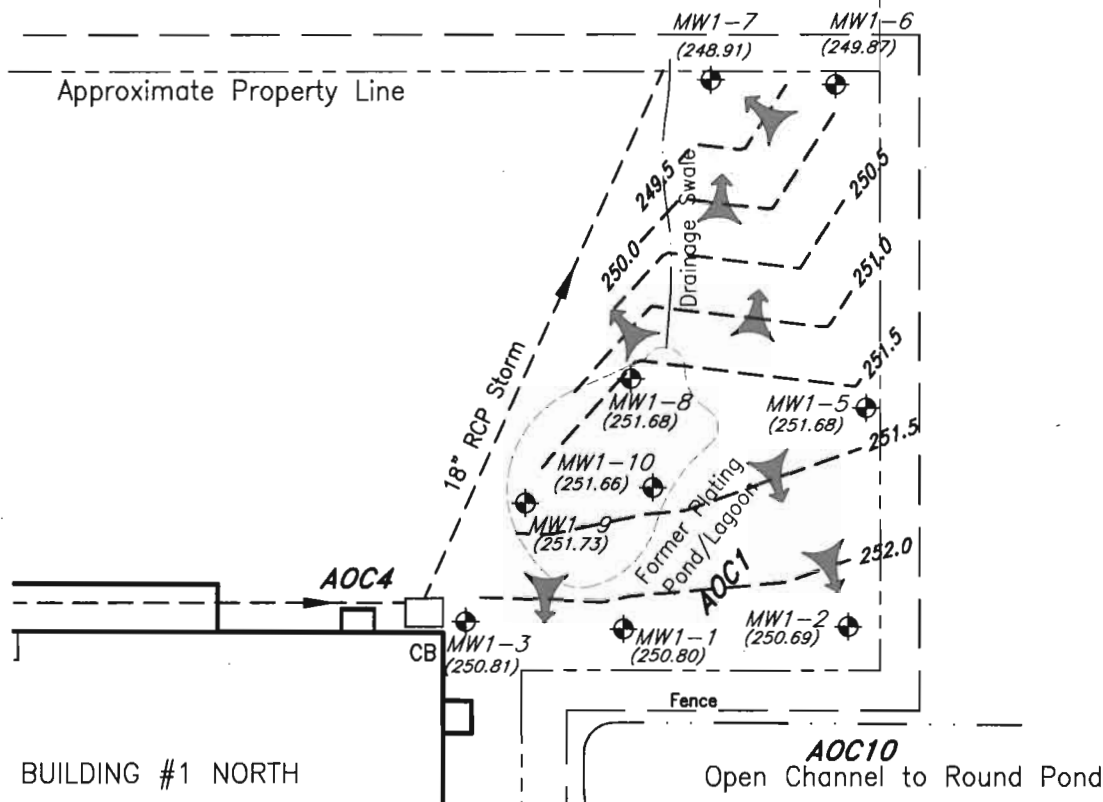
110 = Exceeds groundwater standard or guidance value



PROJECT NO. 2806-01 AOC1-19	PROJECT TITLE 4777 DEWEY AVENUE GREECE, NEW YORK	 DAY ENVIRONMENTAL, INC. ENVIRONMENTAL CONSULTANTS ROCHESTER, NEW YORK 14614-1008 NEW YORK, NEW YORK 10165-1617	FIELD VERIFIED BY JAD	DATE 10-2005
	OPERABLE UNIT OU1 (Area of Concern AOC1)		DRAWN BY RJM	DATE DRAWN 10-21-2005
	DRAWING TITLE Approximate Area in Shallow Overburden Exceeding Groundwater Standards or Guidance Values for VOCs		SCALE 1" = 50'	DATE ISSUED 01-19-2006



Catch Basin Discharge
to Wetlands of Round
Pond



LEGEND:

Well location from a report titled
"Former Air Force Plant No. 51, HTRW
Investigation, Greece, NY" by Ogden
Environmental And Energy Services Co.,
Inc, dated April 2000

AOC1

Area Of Concern with numbered
designation

MW1-1
(250.80)

Groundwater monitoring well with
measured groundwater in Feet.

--- Potentiometric Contour Line for April
21, 2003



➔ Apparent Direction Of Groundwater Flow

DATE
04-29-2003

DRAWN BY
LRP

SCALE
1"=100'

day

DAY ENVIRONMENTAL, INC.
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ROCHESTER, NEW YORK 14614-1008

PROJECT TITLE
4777 DEWEY AVENUE
ROCHESTER, NY

OPERABLE UNIT OU1 (Area of Concern AOC1)

DRAWING TITLE
Potentiometric Overburden Groundwater
Contour Map For April 21, 2003

PROJECT NO.
2806S-01

AOC1-6

Ref1: GenPlan-5.dwg Ref2: Ref3:
Filename: Atkin\4800 Dewey\2806\2806-6.dwg

Time Printed: Mon Oct 24 14:00 2005

AFP 51 GROUNDWATER SUMMARY: APRIL 2007
(Modified by Frank Sowers-NYSDEC 3/10/09)

DATE	01-04-2007
DATE REVISION	01-04-2007
DATE ISSUED	01-04-2007
SCALE	1" = 20'
DATE	01-04-2007
DATE	01-04-2007

DAY
ENVIRONMENTAL CONSULTANTS
ROCHESTER, NEW YORK 14614-1008
NEW YORK, NEW YORK 10165-1617

DRAFT
OPERABLE UNIT 012 (Area of Concern AOC4)
GREECE, NEW YORK
4777 DEWEY AVENUE
PROJECT TITLE
PROJECT NO. 2806S-01
AOC4-X

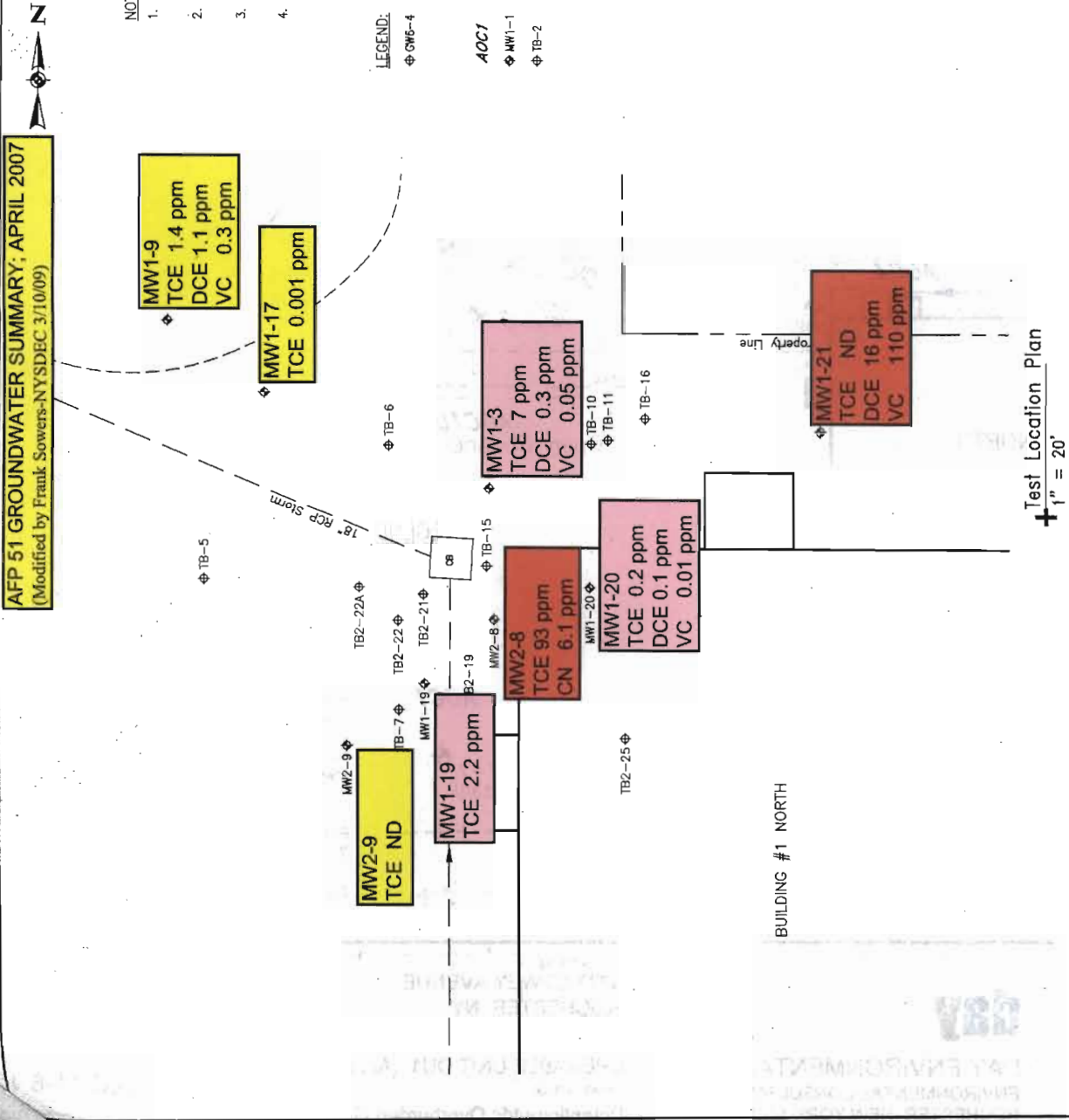
Test Location Plan

NOTES:

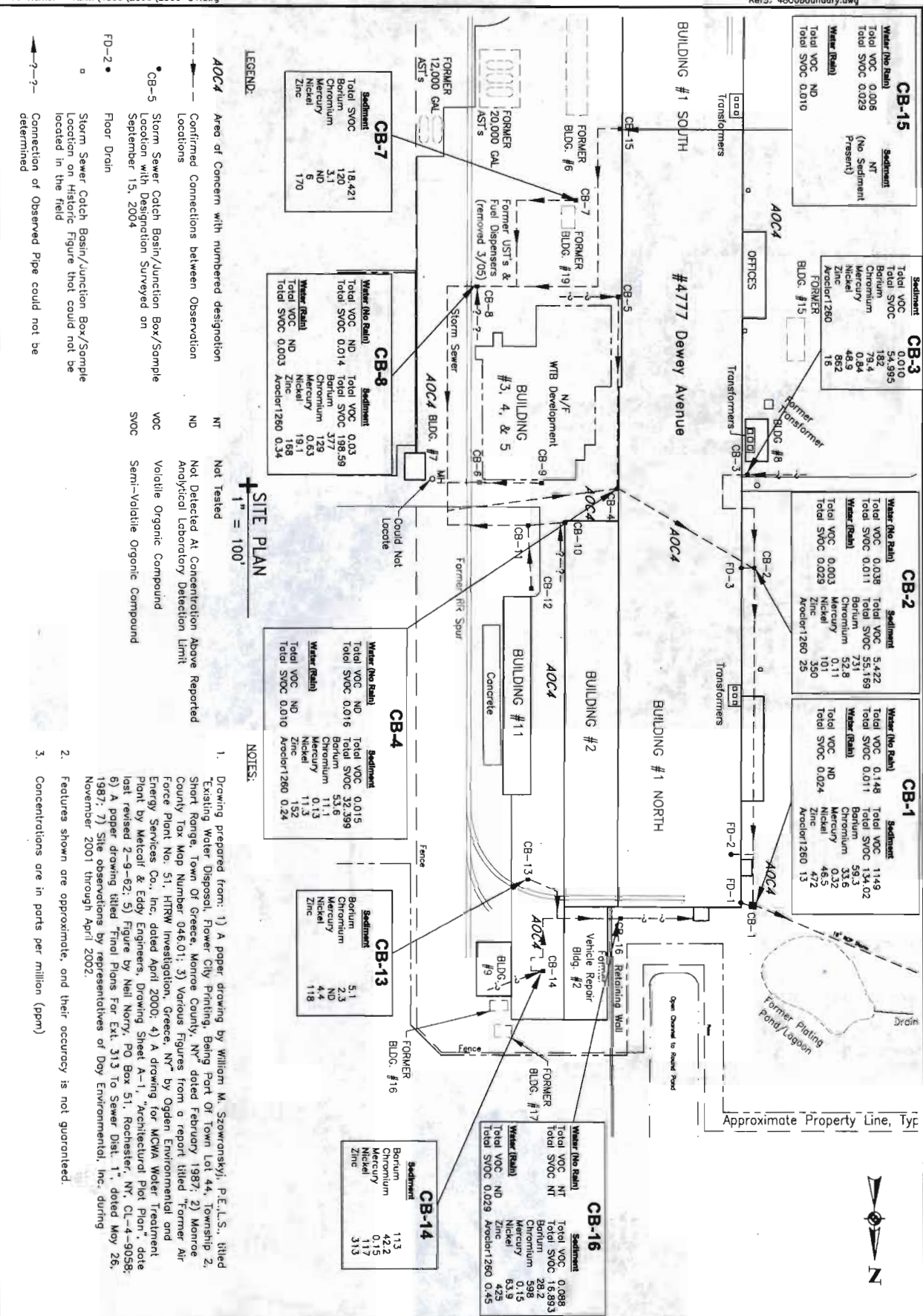
- Monitoring Well MW1-1 thru MW1-10 are 2" PVC wells installed December 2002.
- Monitoring Wells MW1-11 thru MW1-14 are 4" Stainless Steel wells installed July 2003.
- Monitoring Well MW1-15 thru MW1-21 are 2" PVC wells installed March 2004.
- Drawing prepared from Figure GEN-2 in the general work plan dated June 2002 and site observations by representatives of Day Environmental, Inc. from December 2002 through April 2004.

LEGEND:

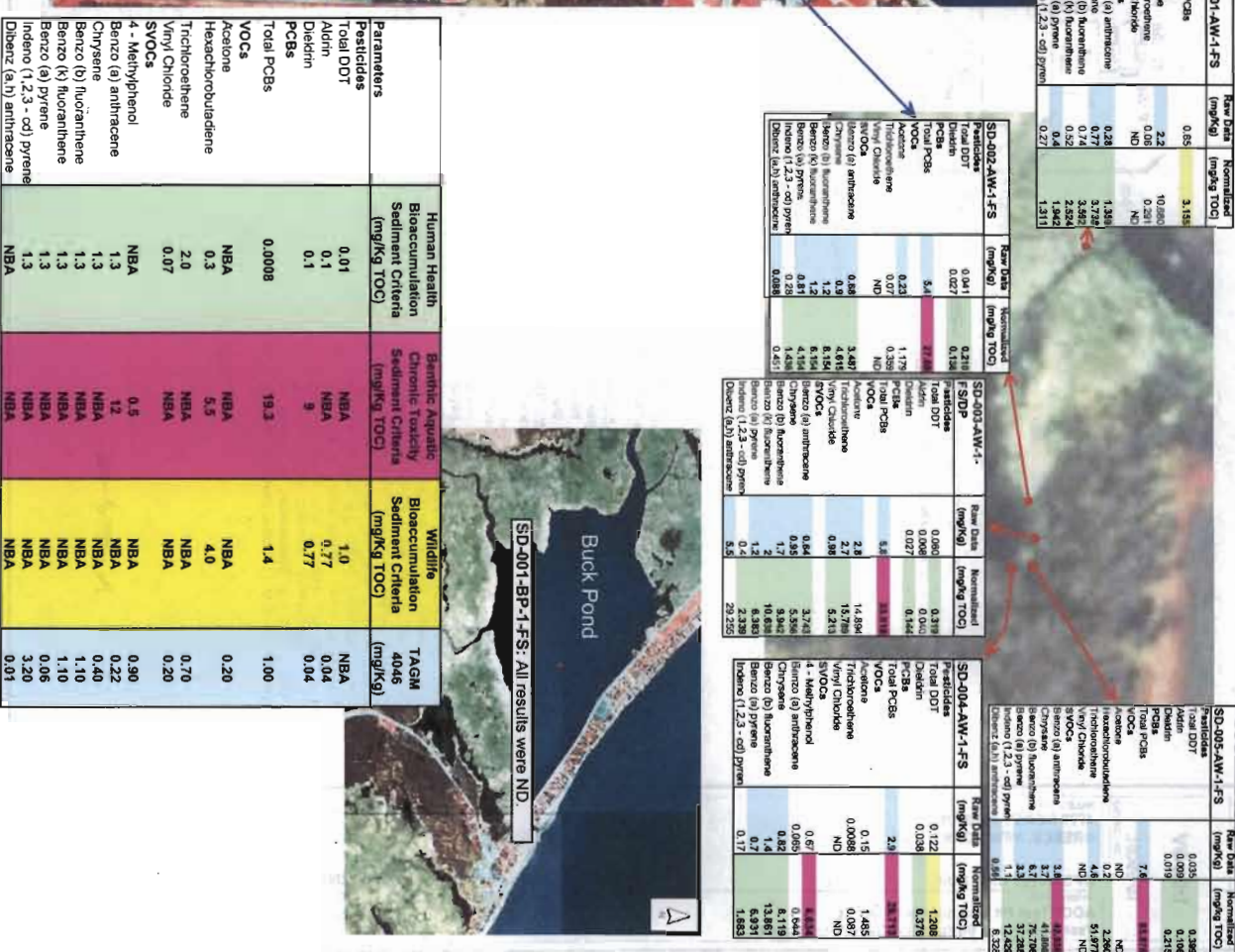
- Well Location identified from a report titled "Former Air Force Plant No. 51, HTRW Investigation, Greece, NY" by Ogden Environmental And Energy Services Co., Inc. dated April 2000
- Area Of Concern with Numbered Designation
- Monitoring Well with Designation
- Test Boring with Designation

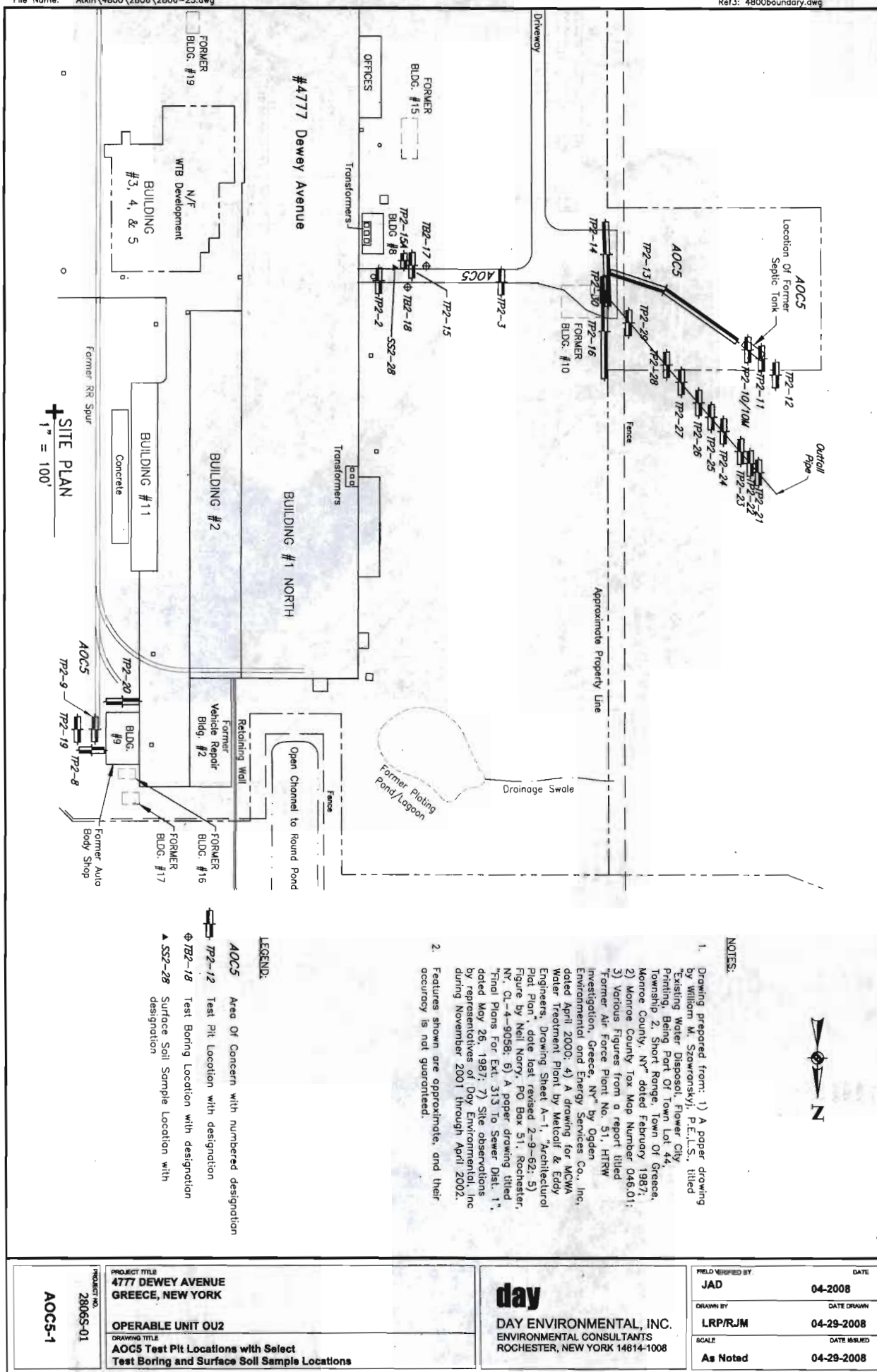


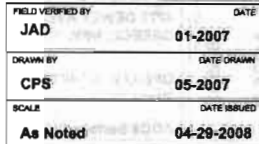
Test Location Plan
1" = 20'

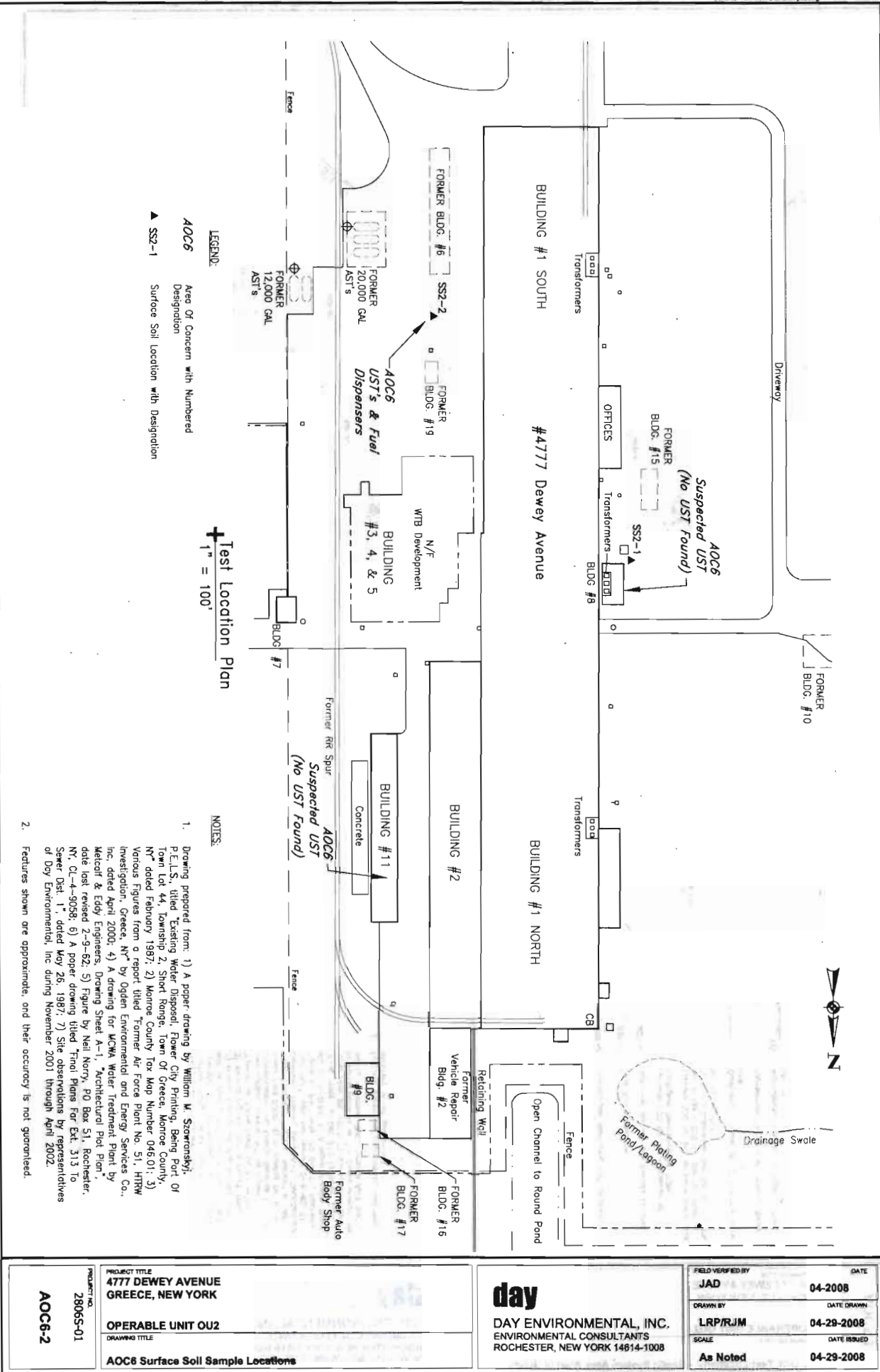


PROJECT TITLE 4777 DEWEY AVENUE GREECE, NEW YORK		FIELD VERIFIED BY JAD		DATE 04-2008	
OPERABLE UNIT OUC2		DRAWN BY LRP/RJM		DATE DRAWN 04-29-2008	
DRAWING TITLE Select Analytical Laboratory Test Results For AOC4 Catch Basin Stormwater System Liquid and Sediment Samples		SCALE As Noted		DATE ISSUED 04-29-2008	









AOC6-2

28065-01

PROJECT TITLE
4777 DEWEY AVENUE
GREECE, NEW YORK

OPERABLE UNIT OU2

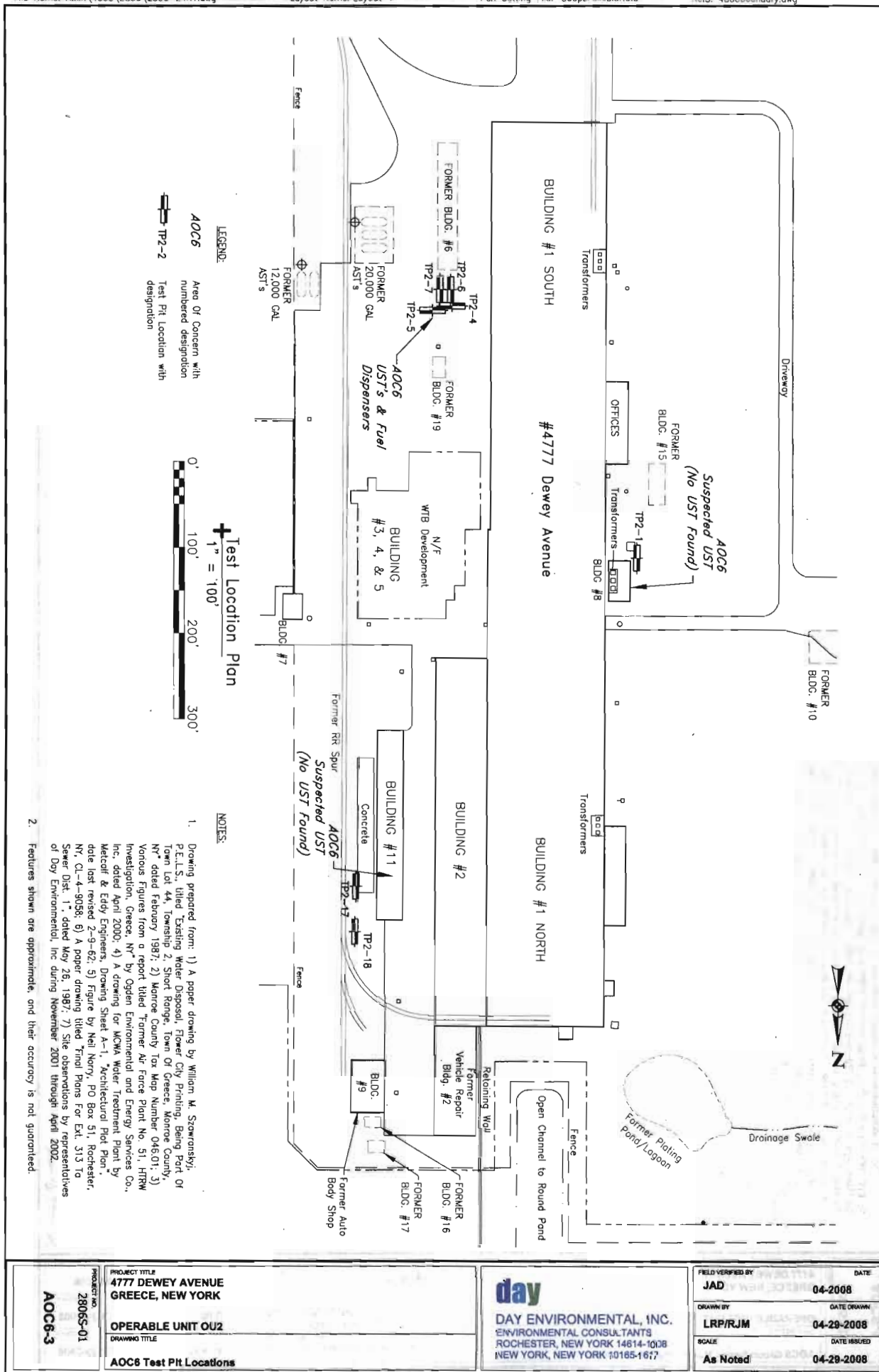
DRAWING TITLE

AOC6 Surface Soil Sample Locations

day

DAY ENVIRONMENTAL, INC.
ENVIRONMENTAL CONSULTANTS
ROCHESTER, NEW YORK 14614-1008

FIELD VERIFIED BY	JAD	DATE	04-2008
DRAWN BY	LRP/RJM	DATE DRAWN	04-29-2008
SCALE	As Noted	DATE ISSUED	04-29-2008



AOC6-3

PROJECT NO.
28065-01

PROJECT TITLE
4777 DEWEY AVENUE
GREECE, NEW YORK

OPERABLE UNIT O02

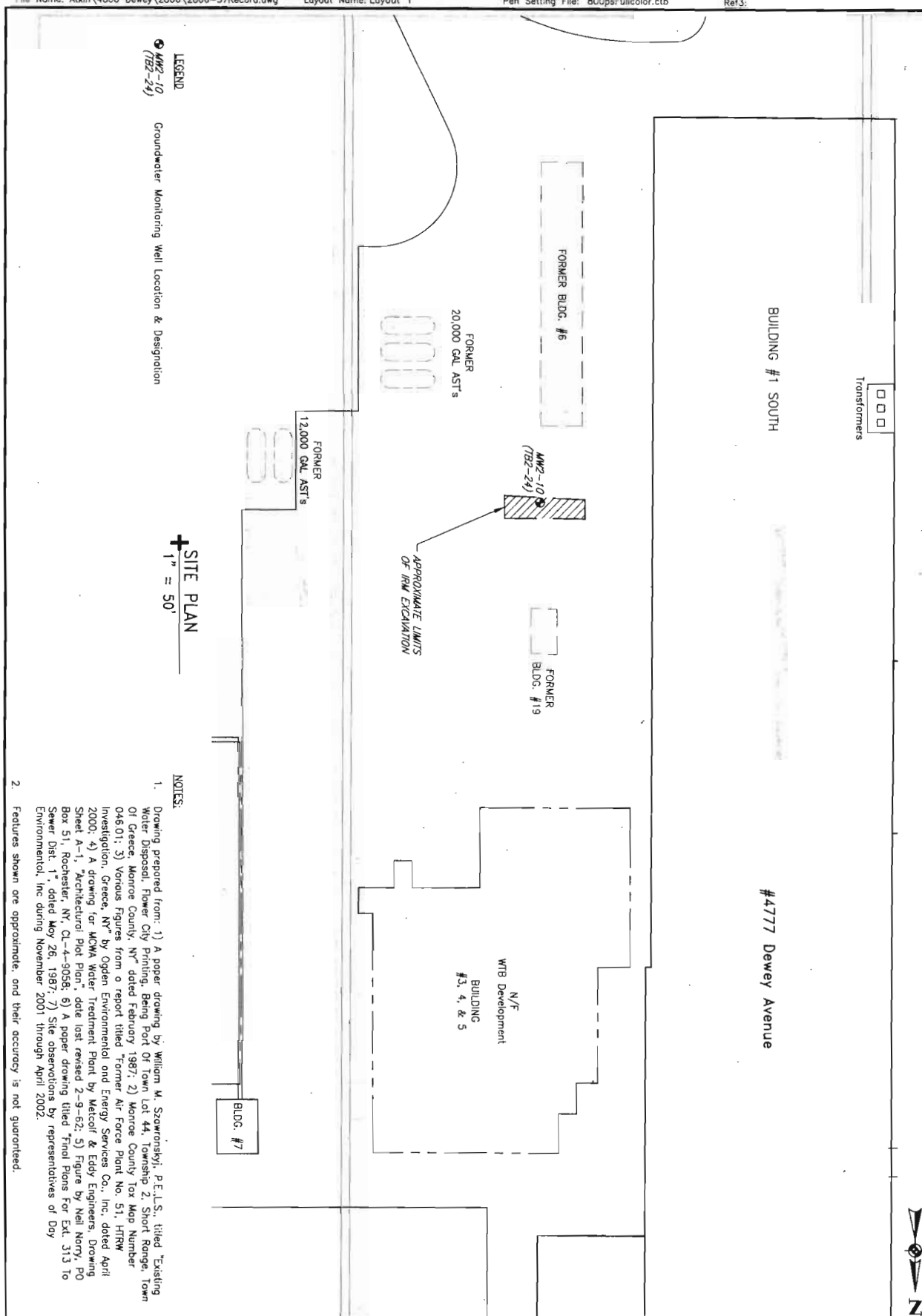
DRAWING TITLE

AOC6 Test Pit Locations

day

DAY ENVIRONMENTAL, INC.
 ENVIRONMENTAL CONSULTANTS
 ROCHESTER, NEW YORK 14614-1008
 NEW YORK, NEW YORK 10185-1617

FIELD VERIFIED BY JAD	DATE 04-20-2008
DRAWN BY LRP/RJM	DATE DRAWN 04-29-2008
SCALE As Noted	DATE ISSUED 04-29-2008



SITE PLAN
 1" = 50'

NOTES:

1. Drawing prepared from: 1) A paper drawing by William M. Szwedzki, P.E., J.S., titled "Existing Water Disposal, Flower City Printing, Being Port Of Town Lot 44, Township 2, Short Range, Town Of Greece, Monroe County, NY" dated February 1987; 2) Monroe County Tax Map Number 046.01; 3) Various figures from a report titled "Former Air Force Plant No. 51, HTRW Investigation, Greece, NY" by Ogden Environmental and Energy Services Co., Inc., dated April 2000; 4) A drawing for MCWA Water Treatment Plant by Metcalf & Eddy Engineers, Drawing Sheet A-1, "Architectural Plot Plan", date last revised 2-9-52; 5) Figure by Neil Henry, PO Box 51, Rochester, NY, CL-4-9056; 6) A paper drawing titled "Final Plans For Ex. 313 To Sewer Dist. 1", dated May 26, 1967; 7) Site observations by representatives of Day Environmental, Inc. during November 2001 through April 2002.
2. Features shown are approximate, and their accuracy is not guaranteed.

PROJECT NO.
28065-01

PROJECT TITLE
**4777 DEWEY AVENUE
 GREECE, NEW YORK**

OPERABLE UNIT O02

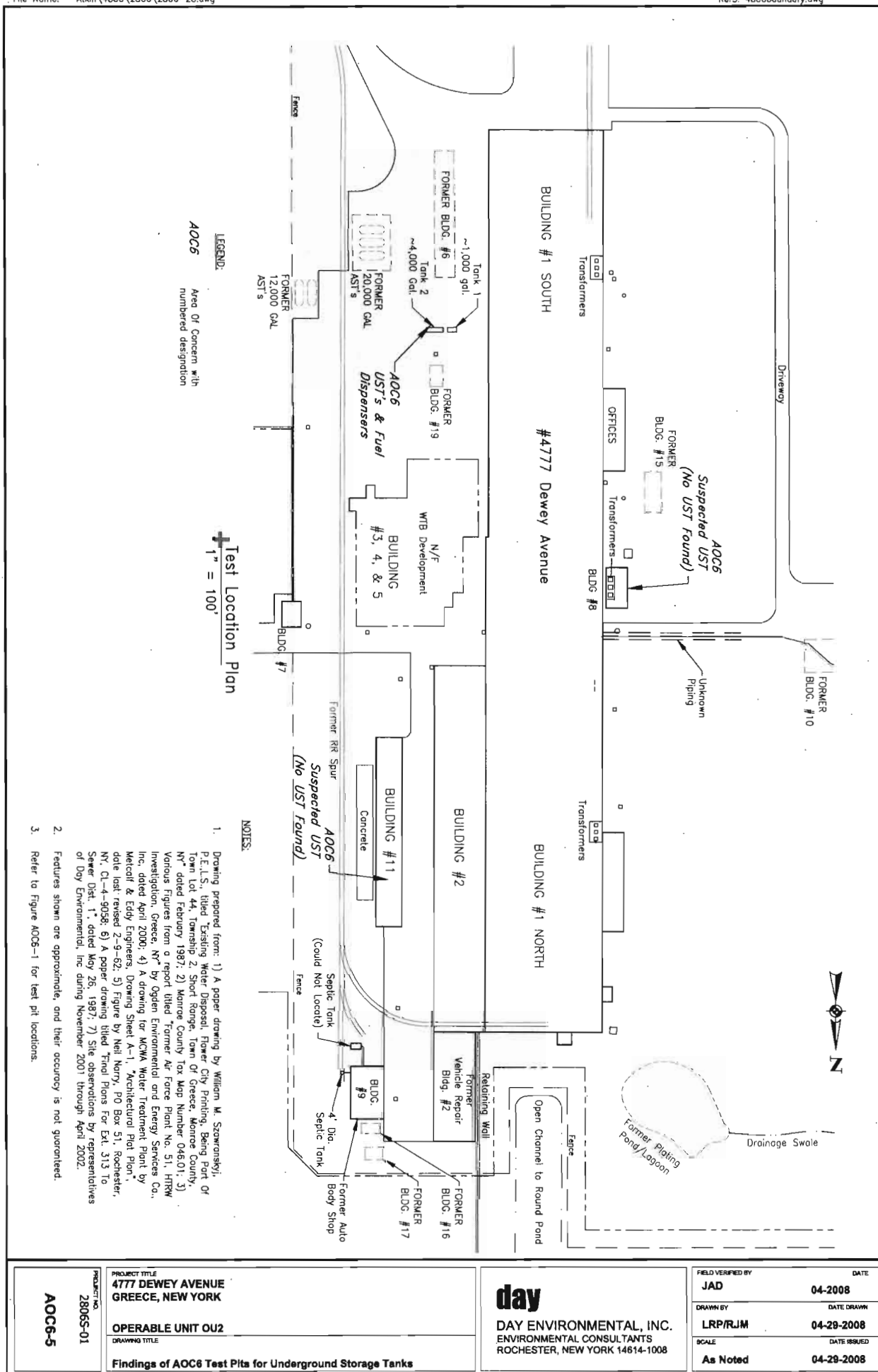
DRAWING TITLE

AO6 Groundwater Monitoring Well Location

day

DAY ENVIRONMENTAL, INC.
 ENVIRONMENTAL CONSULTANTS
 ROCKESTER, NEW YORK 14614-1008
 NEW YORK, NEW YORK 10165-1617

FIELD VERIFIED BY	DATE
JAD	04-2008
DRAWN BY	DATE DRAWN
RJM	04-29-2008
SCALE	DATE ISSUED
1" = 50'	04-29-2008



AOC6-5

2806S-01

PROJECT TITLE
**4777 DEWEY AVENUE
GREECE, NEW YORK**

OPERABLE UNIT OU2

DRAWING TITLE

Findings of AOC6 Test Pits for Underground Storage Tanks

day

DAY ENVIRONMENTAL, INC.
ENVIRONMENTAL CONSULTANTS
ROCHESTER, NEW YORK 14614-1008

FIELD VERIFIED BY	DATE
JAD	04-2008
DRAWN BY	DATE DRAWN
LRP/RJM	04-29-2008
SCALE	DATE ISSUED
As Noted	04-29-2008

