EXPLANATION OF SIGNIFICANT DIFFERENCES MR. C'S DRY CLEANERS SITE



East Aurora / Erie County / Registry No. 9-15-157 / April 2000

Prepared by the New York State Department of Environmental Conservation

Division of Environmental Remediation

1.0 Introduction

The purpose of this notice is to describe the progress of the cleanup at the Mr. C's Dry Cleaners Site and to inform you about a change in the Site remedy. The Mr. C's Dry Cleaners Site is located at 586 Main Street in the Village of East Aurora, Erie County. In March of 1997, the New York State Department of Environmental Conservation signed a Record of Decision (ROD) which selected a remedy to cleanup the Site. While attempting to implement this ROD, the inability to obtain independent bids at a reasonable cost led to the need to revise the remedy.

This Explanation of Significant Differences (ESD) will become part of the Administrative Record for this Site. The information here is a summary of what can be found in greater detail in documents that have been placed in the following repositories:

Aurora Town Public Library	NYSDEC	NYSDEC Region 9 Office
550 Main Street	Div. of Haz. Waste Remediation	270 Michigan Avenue
East Aurora, NY 14052	50 Wolf Road, Room 352	Buffalo, NY 14203
(716)652-4440	Albany, NY 12233-7010	Attn: Michael Podd
Call for hours	William Ottaway, Project Manager	(716) 851-7220
	(518) 457-4343	(M-F 8:30am-4:45pm,by appt.)
	(M-F, 8:00am -4:15pm)	

Although this is not a request for comments, interested persons are invited to contact the Department's Project Manager for this site to obtain more information or have questions answered.

2.0 SITE DESCRIPTION AND ORIGINAL REMEDY

2.1 Site History, Contamination, and Selected Remedy

The existing building used by Mr. C's Dry Cleaners has operated as Mr. C's since 1974, and as a dry cleaner since 1970. Dry cleaning operations at Mr. C's use a cleaning solvent comprised predominantly of tetrachloroethene (a.k.a. perchloroethene or PCE). Since 1985, all wastes have been disposed of through a commercial disposal firm. Prior to 1985, waste was disposed of via the sanitary sewer and the dumpster located behind the hardware store. Tetrachloroethene may have been released to the environment as a result of leakage from the sewer and dumpster, as well as accidental spillage.

Environmental investigations began in October 1991 when chemical odors were detected in the basement of the First Presbyterian Church, located across the street. As a result of the investigations, a plume of contaminated groundwater was delineated. To address the immediate impact to the public, portable indoor

air cleaners were installed at the church, as well as two residences on Whaley Avenue to address indoor air quality.

The Record of Decision (ROD) for this Site called for the installation of up to 8 in-situ air stripping wells, along with piping to convey the vapor phase contaminants to a central carbon treatment facility.

3.0 CURRENT STATUS

The plume of contamination in the groundwater has remained largely unchanged. Recent sampling shows that the contamination has not spread any further. At the suspected principal source of the contamination, the sewer pipe, the contamination levels have fallen off dramatically. This will allow us to eliminate the previously proposed well directly at the source, and rely on the next down-gradient well to address the remaining contamination.

4.0 DESCRIPTION OF SIGNIFICANT DIFFERENCES

4.1 New Information

After the ROD for this project was signed, it was discovered that a sufficient number if independent bids for in-situ air stripping could not be obtained. This predictably resulted in a significant increase in estimated cost. In short, the proprietary nature of the remedy made it not economically feasible. In-situ air stripping was therefore abandoned, and new alternatives were considered.

The first of these alternatives was ex-situ air stripping combined with advanced oxidation. Although this remedy at first appeared to be effective and economical, concerns were raised regarding the safe handling of the oxidizing agent during the design process. Required safety measures, which partially address these concerns, eliminated the cost advantage for this remedy. The recognition that this alternative would be less safe and more expensive than anticipated eliminated it from consideration.

The remedy currently being designed utilizes ex-situ air stripping with activated carbon.

4.2 Comparison of Changes with Original Remedy

Functionally, the treatment processes will be exactly the same as in the ROD. Air stripping is still used to remove the contaminants from the water, carbon is still used to remove the contaminants from the vapor phase waste stream, and underground piping is still used to convey the contamination to the central treatment facility. The air stripping function is simply moved from the wells to a central location to eliminate the expensive, proprietary technology in favor of a more conventional process.

In the original November 1996 Feasibility Study (FS), this remedy was assessed and was found to be protective of human health and the environment, effective and implementable. At that time, the options discussed above in Section 4.1 were considered preferable only because they were expected to be less expensive. Based on the new information listed above, this remedy is the most efficient, safest means to remediate this site.

One additional requirement is that the treated groundwater must be properly disposed of. The water will be the piped and discharged to the Tannery Brook. Prior to discharge, naturally occurring iron in the groundwater must be treated to meet SPDES standards.

5.0 SCHEDULE AND MORE INFORMATION

The remedial design for this project is currently being completed, and the project should go to bid this summer. Construction is expected to begin in late 2000 or early 2001. If you have questions or need additional information you may contact any of the following:

Reports & General Concerns:	Site Related Health Concerns:
William Ottaway, P.E.	Cameron O'Connor
Project Engineer - NYSDEC	NYSDOH
(518) 457-4343	(716) 847-4500

Date

William Ottaway, Project Manager Bureau of Western Remedial Action

4/28/00 Date

Edward R. Belmore, Director Bureau of Western Remedial Action

Date 1

Michael J. O'Toole, Jr., Director

Division of Environmental Remediation