

PERIODIC REVIEW REPORT
For
November 15, 2023 Through November 15, 2024
ENVIRONMENTAL RESTORATION PROGRAM

Former Ford Garage Site
2624 Main Street
Gorham, New York, 14461
NYSDEC Site #B00153

I. Executive Summary

A. Summary

- The Site was formerly improved with an automobile sales and service facility with petroleum storage.
- Types of contamination at the Site that were identified to require remediation included petroleum-related compounds and/or some metals in surface soils, subsurface soils, soil vapor, and/or groundwater.
- Remedial actions taken included:
 - Excavation and disposal of petroleum-impacted soil/fill in source areas;
 - Decommissioning an abandoned dug well;
 - Excavation and disposal of floor drain system piping;
 - In-situ bioremediation of soils and groundwater in the saturated zone;
 - Construction and maintenance of a cover system as an engineering control;
 - Installation of a sub-slab depressurization system (SSDS) engineering control in the basement of the building on the adjoining property to the west;
 - Execution and recording of an Environmental Easement; and
 - Development and implementation of a Site Management Plan (SMP).

B. Effectiveness of the Remedial Program

1. Progress made during the reporting period toward meeting the remedial objectives for the Site included: continued operation of the SSDS; and continued monitoring and inspection of the SSDS and the cover system.
2. The work completed to date shows that the remedial program can achieve the remedial objectives for the Site.

C. Compliance

1. There are no areas of non-compliance with the SMP as modified with NYSDEC approval.
2. As such, no steps were needed to correct areas of non-compliance.

D. Recommendations

1. No changes to the SMP, as modified with NYSDEC approval, are recommended at this time.

2. It is recommended that the frequency of Periodic Review Report (PRR) submittals be decreased to every two years. However, the PRR reporting will continue on an annual basis unless otherwise directed in writing by the NYSDEC.
3. Since residual contamination remains on the Site, it is recommended that site management requirements, as modified by the NYSDEC, be continued.

II. Site Overview

- A. The Site is situated on an approximately 0.385-acre parcel that is bounded by: a hydraulically upgradient former gasoline station (currently used as parkland) to the east; a hydraulically downgradient mixed-use property to the west that is improved with a building used as a restaurant on the first floor and two residential apartments on the second floor; Main Street with commercial properties beyond to the south; and residential property to the north.

Prior to remediation, contamination at the Site consisted of the following:

- An unused dug well;
- A floor drain piping system associated with the former automobile sales and service building;
- Petroleum-related VOCs and petroleum-related PAH SVOCs in soil and groundwater that were generally detected at highest concentration on the southern half of the Site, but also migrating hydraulically downgradient off-site approximately 120 feet to the west;
- Petroleum-related PAH SVOCs and some metals primarily in surface soil, but also sporadically detected in reworked soil fill and subsurface soil, across the Site; and
- Petroleum vapors attributable to soil vapor intrusion in the indoor air of the basement of the building on the hydraulically downgradient adjoining property to the west.

B. Chronology

The site was remediated in accordance with the New York State Department of Environmental Conservation (NYSDEC)-approved Remedial Work Plan (RWP) dated July 2006 and a NYSDEC-approved Engineering Controls Work Plan dated November 2006. A chronology of the Remedial Actions performed at the Site is summarized below:

- In September 2006, the abandoned dug well and the floor drain piping were removed and disposed off-site at a regulated landfill facility.
- In September 2006, petroleum-impacted soils were removed and disposed off-site at a regulated landfill facility.
- Between November 2006 and September 2008, in-situ remediation activities were conducted on-site and off-site. Associated performance monitoring was completed between January 2007 and July 2009.
- In April 2007, the SSDS was installed in the basement of the building located on the adjoining property west of the Site. Associated performance monitoring was completed between December 2007 and April 2008.
- Between October 2009 and November 2009, a cover system was installed at the Site.

- In February 2011, a SMP was finalized and approved by the NYSDEC for long term management of remaining contamination, which includes plans for: (1) institutional and engineering controls, (2) site monitoring, (3) operation and maintenance and (4) reporting.
- Between October 2011 and November 2011, an Environmental Easement was executed and recorded to restrict land use and prevent future exposure to contamination remaining at the Site.

Cleanup goals for groundwater are NYSDEC Technical and Operational Guidance Series (TOGS) 1.1.1 Groundwater Standards and Guidance Values.

Cleanup or on-site re-use goals for soil are NYSDEC Part 375 Commercial Use soil cleanup objectives (SCOs) and Protection of Groundwater SCOs.

Remaining remediation components include: continued implementation of site-wide inspections and SSDS operation/inspections/monitoring in accordance with the SMP.

III. Evaluation of Remedy Performance, Effectiveness and Protectiveness

A. Effectiveness of Remedies

As documented in the Final Engineering Report (FER) dated September 2010, soil removals and in-situ bioremediation were implemented and subsequently evaluated with the collection and analysis of confirmatory soil samples and groundwater samples.

- As shown in the FER, the results of confirmatory soil samples collected in September 2006 from soil excavations and also collected in July 2009 from within the footprint of the treated plume showed that soil in the petroleum source area and plume were successfully remediated to levels that meet applicable SCOs.
- As shown in the FER and subsequent groundwater monitoring under the SMP that ended with a June 2019 monitoring event, some target petroleum-related VOCs remain in groundwater at concentrations above TOGS 1.1.1 groundwater standards and guidance values, but concentrations have generally decreased over time. Residual petroleum-related VOCs and SVOCs exceeding some TOGS 1.1.1 groundwater standards and guidance values are expected since this Site involved a Track 4 cleanup where some contamination above regulatory criteria was allowed to stay in-place and be managed via engineering controls and institutional controls.

An SSDS engineering control was installed in the basement of the building on the adjoining property to the west. In accordance with the SMP, system monitoring and inspection were completed in August 2024. The results of the system monitoring and inspection are presented on the Site-Wide Inspection Form included in Attachment A. As shown, the system monitoring and inspection demonstrates that the SSDS continues to successfully create negative SSDS pressure relative to the interior air pressure of the building.

A cover system engineering control was installed at the Site. In accordance with the SMP, an inspection was completed in August 2024. The results of this inspection are presented on the Site-Wide Inspection Form included in Attachment A. As shown, the cover system continues to successfully inhibit contact with underlying Site media.

Based on the performance monitoring to date, the remedy is shown to be effective at achieving the remedial goals for this Site.

IV. IC/EC Compliance Report

A. IC/EC Requirements/Compliance

1. A description of each control, its objective, and how performance of the control is evaluated is provided below:
 - Site Management Plan: The objective of the SMP is to manage remaining contamination above regulatory criteria in a manner that is protective of human health and the environment. The SMP includes an Institutional and Engineering Control (IC/EC) Plan, a Site Monitoring Plan, and an Operation and Maintenance Plan. The performance of the controls is evaluated through monitoring and periodic certification. Controls on the Site include:
 - Management of soil and historic fill material during future activities that would penetrate, encounter, or disturb remaining contamination needs to be conducted in accordance with provisions of the SMP, including the Excavation Work Plan (EWP);
 - A requirement for evaluating the need to address the potential for soil vapor intrusion on any new enclosed structures on the Site, and designing and implementing engineering controls for those structures to address soil vapor intrusion, if deemed warranted.
 - Requirements for operation, maintenance, and monitoring of the engineering controls (e.g., the SSDS inside the off-site building, and the on-site cover system);
 - Requirements for inspections and notifications for various reasons associated with Site conditions, change in use, change in ownership, etc.; and
 - Requirements for monitored natural attenuation groundwater sampling and analysis. [Note: Per a September 10, 2020 email from the NYSDEC, groundwater monitoring is no longer required, and monitoring wells were decommissioned on November 11, 2020. Well decommissioning records were provided in a previous Periodic Review Report.]
 - Environmental Easement: Restricts use of property; restricts use of groundwater; requires implementation of the SMP; prohibits vegetable gardens and farming; requires evaluation of soil vapor intrusion on new buildings at the Site, and mitigation, if needed; requires operating, maintaining and inspecting any engineering controls; requires groundwater and other environmental and public health monitoring; requires monitoring, maintaining and replacing groundwater wells as necessary as set forth in the SMP; requires reporting of SMP data and information; requires implementation of the SMP for activities that would disturb remaining contaminated media; and requires monitoring to assess the performance and effectiveness of the remedy. The performance of each control is evaluated through periodic certification. [Note: Per the September 10, 2020 email from the NYSDEC, groundwater monitoring is no longer required, sampling and analysis of the sump in the basement of an adjoining property is no longer required, and the monitoring wells associated with this Site were decommissioned.]

2. Status

Each control is fully in place, is being adhered to, and is effective.

3. Corrective Measures

None Required.

4. Conclusions and Recommendations for Changes

The controls are being implemented and no changes are being recommended.

B. Certification

Certification included as Attachment B.

V. Monitoring Plan Compliance Report

A. Components

- Groundwater Monitoring Plan: The anticipated groundwater monitoring plan in the February 2011 SMP was to perform groundwater monitoring over an 8-year period (started in 2012), with monitoring events being conducted using 12-to-18-month intervals.
- Excavation Work Plan: An Excavation Work Plan (EWP) is included as part of the SMP for management of soil and historic fill material that may contain residual contamination at the Site.
- Site-Wide Inspection: Site-wide inspections that include cover system monitoring, SSDS monitoring, and monitoring well inspection are required at least yearly and also after severe weather conditions that may affect engineering controls or monitoring devices.

B. Summary of Monitoring Completed

- Groundwater Monitoring Plan: Per the September 10, 2020 email from the NYSDEC, groundwater monitoring is no longer required and the monitoring wells were decommissioned on November 11, 2020.
- Excavation Work Plan: No activities were performed during the reporting period in relation to requirements of the EWP.
- Site-Wide Inspection: An annual site-wide inspection was completed in August 2024. A copy of the corresponding Site-Wide Inspection Form is included in Attachment A. The inspection revealed the following:
 - The asphalt paved and earthen grass-covered portions of the cover system were observed in good condition. Only a few cracks were observed in the sealer placed on the asphalt pavement top coat.
 - Vacuum readings of -0.109” H₂O and -0.121” H₂O were measured at the SSDS monitoring points inside the basement of the building on the adjoining property to the west. In addition, the components of the SSDS were observed to be operating as designed.

C. Comparison with Remedial Objectives

- Groundwater Monitoring Plan: Not applicable.
- Excavation Work Plan: Not applicable.
- Site-Wide Inspection: Not applicable.

D. Monitoring Deficiencies

There are no monitoring deficiencies.

E. Conclusions and Recommendations for Changes

- Groundwater Monitoring Plan: Per the September 10, 2020 email from the NYSDEC, groundwater monitoring is no longer required and the monitoring wells were decommissioned on November 11, 2020.
- Excavation Work Plan: No changes to the EWP are recommended.
- Site-Wide Inspection: Inspection and monitoring of the cover system on the Site, and the SSDS in the basement of the building on adjoining property to the west, will continue.

VI. Operation & Maintenance (O&M) Plan Compliance Report

- A. Components of O&M Plan: Components include operation and maintenance of the off-site SSDS in the basement of the building located on adjoining property to the west, and maintenance of the on-site cover system. The O&M Plan for the SSDS includes steps to allow individuals unfamiliar with the Site to operate and maintain the SSDS, and an operation and maintenance contingency plan. Routine monitoring is conducted as part of the annual site-wide inspection, and non-routine maintenance reports can be prepared, when deemed necessary.
- B. O&M Completed during the Reporting Period: The components of the SSDS were checked and tested in August 2024.
- C. Evaluation of Remedial Systems: Based on O&M activities completed, the off-site SSDS and on-site cover system are performing as designed/expected.
- D. O&M Deficiencies: No deficiencies were identified in complying with the O&M plan during the PRR reporting period.
- E. Conclusions and Recommendations for Improvements: O&M monitoring and maintenance were completed successfully in accordance with the SMP, and no improvements requiring changes to the O&M Plan are suggested.

VII. Overall PRR Conclusions and Recommendations

A. Compliance with SMP

1. The requirements of the following plans were met during the reporting period:
 - IC/EC requirements.
 - Monitoring Plan requirements.
 - O&M requirements.
2. Identify any requirements not met: Not applicable.
3. Identify any proposed plans and a schedule for coming into full compliance: Not applicable.

- B. Performance and Effectiveness of Remedy: An evaluation of the components of the SMP during this reporting period indicated that: the IC/EC controls were protective of human health and the environment; the monitoring plan continues to sufficiently monitor the performance of the remedy; the O&M Plan is sufficiently maintaining the off-site SSDS and on-site cover system; and the remedial program is achieving the remedial objectives for the Site.

C. Future PRR submittals:

1. A PRR will continue to be submitted annually unless otherwise instructed in writing by the NYSDEC. However, it is requested that the NYSDEC decrease the frequency of PRR submittal to every two years for the following reasons:
 - As previously presented in this PRR, the last groundwater monitoring event required by the NYSDEC was in June 2019, and monitoring wells were decommissioned in 2020 as approved by the NYSDEC.
 - The Site is already developed as a paved parking lot, and disturbance or breaching of the existing cover system is not anticipated.
2. Since residual contaminants remain at the Site, it is recommended that the SMP, with modifications to its Monitoring Plan as outlined in the NYSDEC email dated September 10, 2020, continue to be implemented at this Site.

Attachment A

**Site-Wide Inspection Form
(August 2, 2024 Inspection)**

Site-Wide Inspection Form
2624 Main Street, Gorham, New York
NYSDEC ERP Project #B00153-8

Date of Inspection Site Visit: August 2, 2024

Personnel Performing Inspection Site Visit: J. Danzinger

Affiliation of Personnel: Day Environmental, Inc.

1. Check integrity of asphalt pavement cover, including whether any sloughing, cracks, settlement, damage, etc.

Discuss observations and any corrective actions: Asphalt integrity is good. A few cracks in sealer

2. Check integrity of soil cover, including whether any erosion, settlement, damage, etc.

Discuss observations and any corrective actions Soil cover integrity is good.

3. Check integrity of grass vegetation on soil cover area

Discuss observations and any corrective actions Grass vegetation integrity is good. Some soil at eadge of pavement is devoid of vegetation likely from sheet flow precipitation run-off and snow plowing.

4. Check integrity of monitoring wells, including whether any blockage, damage, etc.

Discuss observations and any corrective actions Not Applicable. Wells decommissioned in 2020.

5. Provide any other notes or observations of interest

None

**Annual Operation, Maintenance and Monitoring Checklist
for Engineering Controls at the Old Mill House Restaurant Building
2626 Main Street, Gorham, New York
NYSDEC ERP Project #B00153-8**

Date of OM&M Site Visit: August 2, 2024

Personnel Performing OM&M: J. Danzinger

Affiliation of Personnel: Day Environmental, Inc.

1. Check that the exterior in-line fan is operating.

Discuss observations and any corrective actions Fan observed operating.

No corrective actions required.

2. Check exterior air vent discharge point associated with the SSDS to verify no air intakes have been installed nearby.

Discuss observations and any corrective actions No air intakes observed to be installed near exterior SSDS air vent discharge point.

3. Check integrity of interior and exterior aboveground vent piping, including insulation on exterior piping.

Discuss observations and any corrective actions Integrity observed to be good.

4. Check integrity of concrete floor, associated grout and silicone sealant along walls and penetrations.

Discuss observations and any corrective actions Integrity observed to be good.

5. Check for measurable vacuum at Vacuum Monitoring Points No. 1 and No. 2.

Document measurements and any corrective actions On August 2, 2024, using TPI 621 digital manometer, vacuum at monitoring point #1 = -0.109" H₂O, and vacuum at monitoring point #2 = -0.121" H₂O.

6. Trip the alarm and check that visual and audible components of system alarm are operating.

Discuss visual and audible testing and any corrective actions Alarm tripped by turning off fan.

Visual and audible alarm components worked correctly.

**Annual Operation, Maintenance and Monitoring Checklist
for Engineering Controls at the Old Mill House Restaurant Building
2626 Main Street, Gorham, New York
NYSDEC ERP Project #B00153-8**

7. Check labeling on interior and exterior aboveground system piping, control box and alarm.

Discuss observations and any corrective actions Integrity of interior labeling is good.
Replaced exterior labeling.

8. Check for leaks from piping associated with the groundwater sump discharge. Including piping between the sump and carbon treatment drum, and discharge piping from the carbon treatment drum.

Discuss observations and any corrective actions No leaks observed from piping.

9. Check carbon filter container and other components of the system for signs of wear or corrosion.

Discuss observations and any corrective actions No wear or corrosion on carbon filter container or other components.

10. Check sediment pre-filter for debris.

Discuss observations and any corrective actions No debris observed in sediment pre-filter.

11. Trip the sump pump to ensure it is still operational.

Discuss observations and any corrective actions Water table too low to trip sump pump.

12. Every 2 years - collect water samples from influent and effluent sample ports on each side of the carbon filter.

Last date samples collected June 25, 2018

Discuss if samples collected and any observations NYSDEC no longer requires samples to be collected

13. Provide any other notes or observations of interest.

None.

Photolog
Site-Wide Inspection
2624 Main Street, Gorham, New York
NYSDEC ERP Site #B00153-8
August 2, 2024



2626 Main St SSDS Monitoring Pt #1 in basement



2626 Main St sealed and vented basement sump with discharge connected to carbon treatment system



2626 Main St filter on basement sump discharge in front of carbon treatment system



2626 Main St SSDS piping and labeling in basement



2626 Main St SSDS piping and labeling in basement



2626 Main St SSDS Monitoring Pt #2 in basement



2626 Main St SSDS control box in basement



2626 Main St SSDS exterior fan and piping with new labeling – looking south



2626 Main St SSDS exterior piping – looking south



Asphalt pavement and earthen cover system – looking west



Asphalt pavement and earthen cover system – looking east



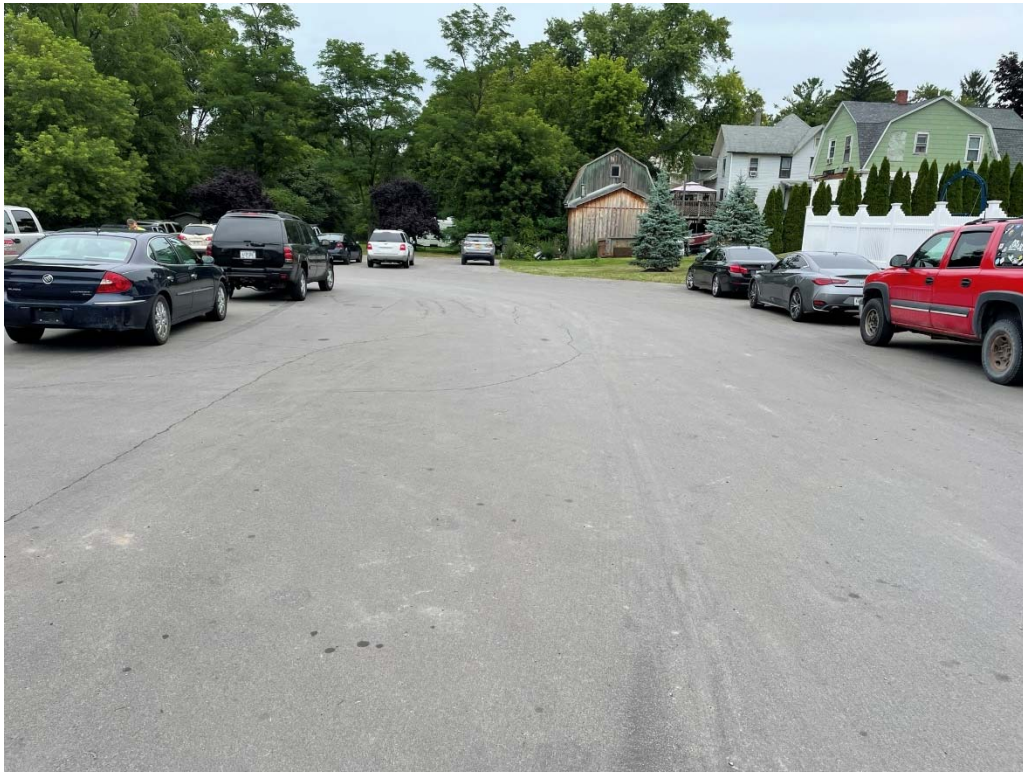
Asphalt pavement cover system – looking east



Asphalt pavement cover system – looking south



Asphalt pavement cover system – looking east



Asphalt pavement cover system – looking north

Attachment B

Institutional and Engineering Controls Certification Form



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



Site Details

Site No. **B00153**

Box 1

Site Name **Ford Garage Environmental Clean-Up**

Site Address: 2624 Main Street Zip Code: 14461-
City/Town: Gorham
County: Ontario
Site Acreage: 0.385

Reporting Period: November 15, 2023 to November 15, 2024

- | | YES | NO |
|--|-------------------------------------|-------------------------------------|
| 1. Is the information above correct? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| If NO, include handwritten above or on a separate sheet. | | |
| 2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form. | | |
| 5. Is the site currently undergoing development? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Box 2

- | | YES | NO |
|--|-------------------------------------|--------------------------|
| 6. Is the current site use consistent with the use(s) listed below?
Commercial and Industrial | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. Are all ICs in place and functioning as designed? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

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

Signature of Owner, Remedial Party or Designated Representative

Date

Description of Institutional Controls

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
144.10-1-25	Town of Gorham - Fred Lightfoote	Ground Water Use Restriction Soil Management Plan Landuse Restriction Monitoring Plan Site Management Plan O&M Plan IC/EC Plan

An on-site cover system and off-site sub-slab depressurization system for an adjoining building to the west have been implemented as engineering controls for this Site.

- The Site may only be used for commercial use provided that the long-term Engineering and Institutional Controls included in the Site Management Plan are employed.
- The property may not be used for a higher level of use, such as unrestricted use, residential use, or restricted residential use without additional remediation and amendment of the Environmental Easement, as approved by the NYSDEC;
- Future activities on the Site that will disturb remaining contaminated material must be conducted in accordance with the SMP;
- The use of the groundwater underlying the Site is prohibited without treatment rendering it safe for intended use;
- The potential for vapor intrusion must be evaluated for new buildings developed on the Site, and any potential impacts that are identified must be monitored or mitigated;
- Vegetable gardens and farming on the Site are prohibited;
- The Site owner will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC may allow and will be made by an expert that the NYSDEC finds acceptable.

Description of Engineering Controls

<u>Parcel</u>	<u>Engineering Control</u>
144.10-1-25	Vapor Mitigation Cover System

Periodic Review Report (PRR) Certification Statements

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

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

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

YES NO

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

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

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

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

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

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

YES NO

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

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

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. B00153

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

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

I Dale Stell at 4736 South St., PO Box 224, Gorham, NY 14461,
print name print business address

am certifying as Owner (Owner or Remedial Party)

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



12/10/2024

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

Date

EC CERTIFICATIONS

Box 7

Professional Engineer Signature

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

I Timothy K. Hampton at 1563 Lyell Avenue, Rochester, NY 14606,
print name print business address

I am certifying as a Professional Engineer for the Owner
(Owner or Remedial Party)



Signature of Professional Engineer, for the Owner or Remedial Party, Rendering Certification

11/26/2024
Date
Stamp
(Required for PE)