Stantec Consulting Services Inc.
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May 3, 2012

Mark Gregor, CHMM
Manager, Division of Environmental Quality, Department of Environmental Services
City of Rochester
City Hall, Room 300B
30 Church Street
Rochester, New York, 14614-1278

RE: Periodic Review Report #1
Brownfield Site Cleanup, Former Davidson Collision Site
399-409 Gregory Street Rochester, New York

Dear Mark:

EXECUTIVE SUMMARY

Stantec has prepared this letter in support of the City of Rochester's (City) efforts to prepare a Periodic Review Report (PRR) for 399-409 Gregory Street (the Site) in the City of Rochester. The petroleum and metals contaminants at the Site were remediated by excavation as part of the New York State Department of Conservation (NYSDEC) Brownfield Cleanup Program (BCP) (Site Number C828091). The remedial objectives were met for restricted residential use. This report covers the period from issuance of the Certificate of Completion (COC) in October 2010 through April 2012.

SITE OVERVIEW

The City of Rochester acquired the Site in November 2004 through delinquent tax foreclosure. The 0.46 acre site was operated by Davidson Collision as an auto body shop from the early 1960s until it went out of business in March 1993. In June 1993, the auto body shop reopened for a brief period under new management and the name of Southwedge Collision. The Former Davidson Collision building was previously demolished and the site is vacant.

The 399 Gregory Street parcel is zoned Community Center District (C-2). Gregory Street and residential structures are located north of the Site. Residential properties and a distribution facility are located east of the site. A residential house and associated garage are located south of the Site. Cayuga Street, residential properties, and a four story commercial and residential building are located west of the Site.

Investigations at the site between 1991 and 1994 identified the presence of soil contamination by paint waste including paint thinner that had been released from a pipe leading from a paint booth inside the former collision shop to a storage container outside the building. In January 1993, some contaminated soil from the waste disposal area was excavated.

The 1991 and 1993 activities were performed without NYSDEC approval or oversight. In 1994, NYSDEC conducted an investigation and determined that the 1993 soil removal activity did not remove all of the subsurface contamination. NYSDEC conducted an investigation in 2000-2002 to obtain additional information regarding the nature and extent of contamination and to determine if the site represented a significant threat to human health or the environment. NYSDEC concluded there was a small, highly

impacted VOC source area, but nearby residential properties were not impacted. After obtaining a United States Environmental Protection Agency Brownfield Assessment Grant to investigate the site, the City foreclosed on the property in 2004 and entered the State's Brownfield Cleanup Program.

Cleanup activities were completed at the site in June 2009. The following is a summary of the cleanup activities completed at the site:

1. Removal of the concrete slab (floor), most of the foundation footers of the former building, and removal of select portions of the adjacent asphalt parking lot.
2. Excavation of contaminated soil from the three remedial areas of concern at the site. Soils at the site were contaminated by petroleum products and metals such as arsenic, cadmium, copper, lead, and selenium. The contaminated soils were disposed off-site at a permitted landfill. The soil removal protects public health and the environment by eliminating potential exposure to contaminated soil and removes the source of the groundwater contamination at the site. Laboratory analysis of confirmatory soil samples collected after the soil removal was completed demonstrated that restricted residential soil cleanup objectives established by NYSDEC had been achieved.
3. An oxygen releasing bioremediation agent was applied to the open excavation where the petroleum contaminated soils were removed. The bioremediation agent was applied prior to backfilling the excavation with clean soil. This product is designed to promote the cleanup of the contaminated groundwater in place.
4. Placement of clean soil and crushed stone in the areas where the concrete slab had been removed and where remedial excavations were completed.
5. Development and implementation of a Site Management Plan (SMP) approved by NYSDEC for long term management of potential unidentified remaining contamination. The SMP contains the following:
    - An Excavation Plan with guidance for future excavation activities that may be conducted during construction or underground utility work at the site.
    - A Groundwater Monitoring Plan with specifications for periodic groundwater sampling which confirmed that groundwater cleanup requirements for Area 1 have been achieved. The groundwater monitoring program was discontinued following the February 2010 sampling round, given that several rounds of satisfactory results had been achieved.
    - Flagging of the site property in the City of Rochester Building Information System such that all future permit applications will be reviewed by the City Division of Environmental Quality for compliance with the SMP.
    - A conceptual design for a sub-slab depressurization system that may be required for proposed structures to minimize the potential for exposure to volatile organic compounds via soil vapor intrusion.
6. The Certificate of Completion was issued in October 2010.

EVALUATE REMEDY PERFORMANCE, EFFECTIVENESS, AND PROTECTIVENESS

Based on the data previously submitted to the NYSDEC concerning the soil removal, application of bioremediation agent, and groundwater sampling, the restricted residential remedial objective has been met.

IC/EC PLAN COMPLIANCE REPORT

The Site is subject to an Environmental Easement including groundwater use restriction, landuse restriction to restricted residential, and a Site Management Plan (SMP) in order to limit human exposure. Any future buildings must evaluate the need for a vapor mitigation system. The Site is flagged in the City

of Rochester's Building Information System such that all future permit applications will be reviewed by the City Division of Environmental Quality for compliance with the SMP. All IC/ECs are performing as expected.

MONITORING PLAN COMPLIANCE REPORT

An Excavation Work Plan is included in the SMP and is to be applied to any future excavation on the Site. Four rounds of quarterly groundwater monitoring were performed after soil excavation was completed and before the COC was issued. Based on the results of the sampling, previously submitted to the NYSDEC, it was determined that cleanup objectives had been met, and the NYSDEC approved the cessation of quarterly groundwater monitoring on May 10, 2010.

On August 15, 2011, three wells (MW-107, MW-112, and MW-BR-3) located in the parking lot area of 399 Gregory Street were decommissioned (Figure 1) following safety concerns that were expressed by the tenant that leases the parking lot. Due to tripping hazard concerns, MW-107 and MW-112 had been paved over by others with asphalt patches. These were located using a combination of site features, measurements, and a metal detector. In order to access the wells, the asphalt patch was removed. However, MW-112 did not appear to have a cover or j-plug and the well was only open to approximately 4 feet below ground surface, suggesting that the majority had been filled with asphalt when the patch was installed. MW-107 retained the j-plug and MW-BR-3 retained the well box cover and j-plug with no covering asphalt patch, so both were open to approximately the intended depth. An attempt was made to clear the asphalt out of MW-112 but was unsuccessful. Given the conditions of the wells, a secure grip on the riser could not be obtained in order to pull the riser, so the wells were grouted in place. Once the wells were grouted, the ground surface was restored with asphalt cold patch. Due to the groundwater present in MW-BR-3 and the 4" diameter of the hole, some patch was observed to sink, so cones were left over each hole overnight in order for the grout and patch to cure, and MW-BR-3 was further patched on the morning of August 16, 2011. Driller's records of the decommissioning are attached as Appendix A.

A site inspection was performed on April 9, 2012. The Site appeared to be in good condition and no damage to the Site cover was observed. However, on 10 Cayuga Street, the property to the south, which is not included in the Brownfield project but was utilized during remediation, a patch of bare dirt was observed near Cayuga Street. The patch was approximately 3 ft by 6 ft. The owner, Mr. John Trickey, knows of no changes to the 10 Cayuga Street property, including the patch of bare dirt (see attached photos, Appendix B).

OVERALL PRR CONCLUSIONS AND RECOMMENDATIONS

Compliance with the SMP has been achieved for this reporting period and restricted residential remedial objective have been achieved.

Should you have any questions or require further information, please contact me.

Sincerely,

STANTEC CONSULTING SERVICES INC.

Michael P. Storonsky
Managing Principal
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Fax: 585-272-1814
mike.storonsky@stantec.com

Dorothy Bauch-Barker
Environmental Geologist
Tel: 585-413-5276
Fax: 585-272-1814
dorothy.bauchbarker@stantec.com

Enclosures:

Figure 1 – Groundwater Monitoring Wells
Appendix A – Well Decommissioning Record
Appendix B – Photos

ec Rick Rynski

U:\190500196\report\Progress Reports\PRR-1\ltr_190500196_399.Gregory.St_well.decom-PRR.docx

FIGURES

Cartographic Design By: A. Less

Geographic Information Systems

Path: U:\190500196\GIS\GIS\Remedial_Construction\MXD\Fig1_Groundwater_Monitoring Wells_04_2012.mxd

Stantec Consulting
61 Commercial Street
Rochester, NY 14614
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Figure 1 - Groundwater Monitoring Wells

399 Gregory Street, Rochester NY

APPENDIX A

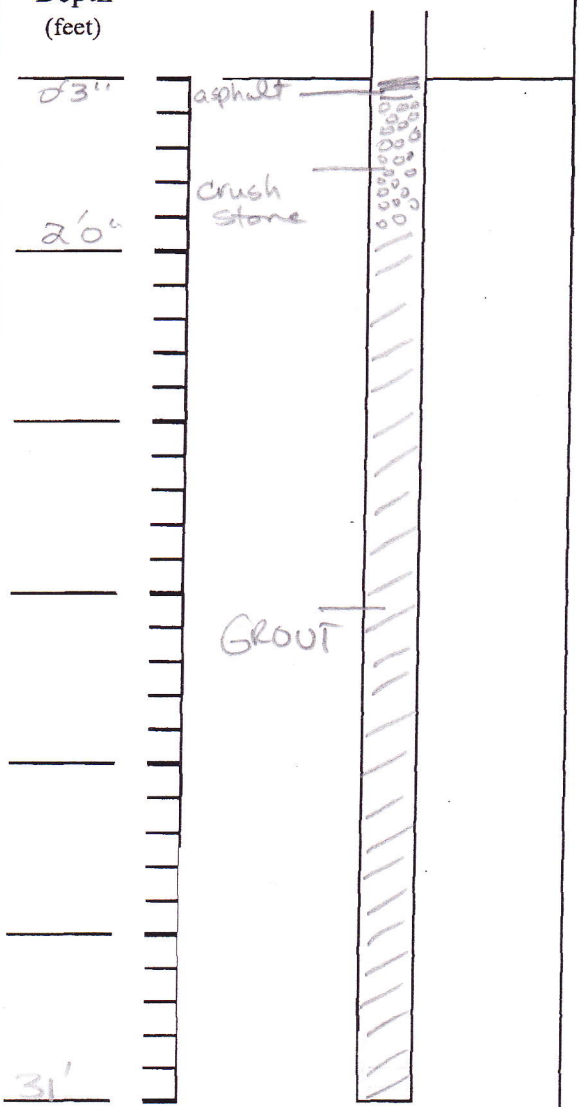
WELL DECOMMISSIONING RECORD

Site Name: GREGORY ST WELL CLOSURES ROCHESTER, NY	Well I.D.: BR-1 MW-BR-3
Site Location: GREGORY ST ROCHESTER, NY	Driller: N. SHORT
Drilling Co.: NOTHNAGLE DRILLING	Inspector: DORTHY BAUCH-BAILER
	Date: AUG. 15, 2011

DECOMMISSIONING DATA
(Fill in all that apply)

OVERDRILLING	
Interval Drilled	
Drilling Method(s)	
Borehole Dia. (in.)	
Temporary Casing Installed? (y/n)	
Depth temporary casing installed	
Casing type/dia. (in.)	
Method of installing	
CASING PULLING	
Method employed	
Casing retrieved (feet)	
Casing type/dia. (in)	
CASING PERFORATING	
Equipment used	
Number of perforations/foot	
Size of perforations	
Interval perforated	
GROUTING	
Interval grouted (FBLS)	31'
# of batches prepared	1
For each batch record:	
Quantity of water used (gal.)	20
Quantity of cement used (lbs.)	188
Cement type	I/II
Quantity of bentonite used (lbs.)	8
Quantity of calcium chloride used (lbs.)	none
Volume of grout prepared (gal.)	24
Volume of grout used (gal.)	20

WELL SCHEMATIC*



COMMENTS: REMOVED SURFACE COMPLETION; TREMIE GROUT 4" BIP IN PLACE.

* Sketch in all relevant decommissioning data, including: interval overdrilled, interval grouted, casing left in hole, well stickup, etc.

Drilling Contractor

Department Representative

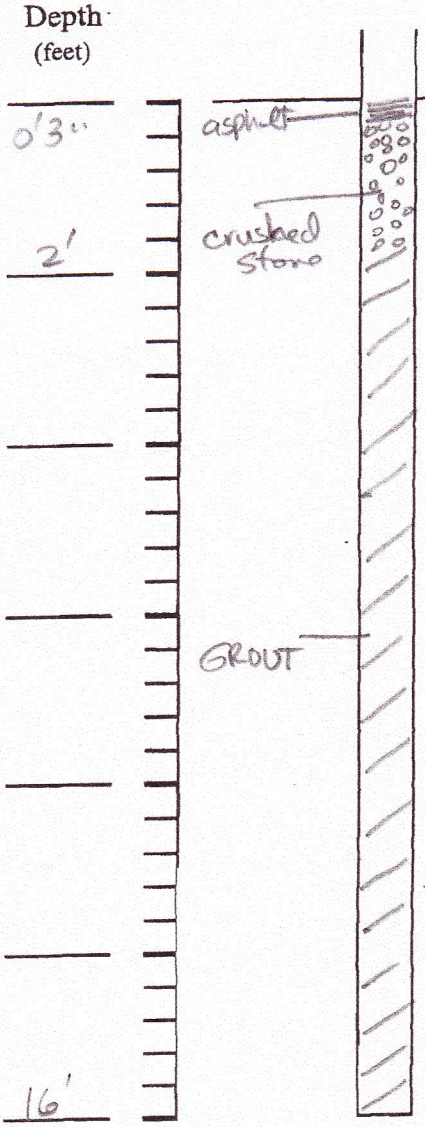
WELL DECOMMISSIONING RECORD

Site Name: GREGORY ST. WELL CLOSURES ROCHESTER, NY	Well I.D.: MW-1 MW-107
Site Location: GREGORY ST. ROCHESTER, NY	Driller: N. SHORT
Drilling Co.: NOTHNAGLE DRILLING	Inspector: DORTHY BAUCH-BAKER
	Date: AUG. 15, 2011

DECOMMISSIONING DATA
(Fill in all that apply)

OVERDRILLING	
Interval Drilled	
Drilling Method(s)	
Borehole Dia. (in.)	
Temporary Casing Installed? (y/n)	
Depth temporary casing installed	
Casing type/dia. (in.)	
Method of installing	
CASING PULLING	
Method employed	
Casing retrieved (feet)	
Casing type/dia. (in)	
CASING PERFORATING	
Equipment used	
Number of perforations/foot	
Size of perforations	
Interval perforated	
GROUTING	
Interval grouted (FBLS)	16'
# of batches prepared	1
For each batch record:	
Quantity of water used (gal.)	10
Quantity of cement used (lbs.)	94
Cement type	I/II
Quantity of bentonite used (lbs.)	4
Quantity of calcium chloride used (lbs.)	none
Volume of grout prepared (gal.)	12
Volume of grout used (gal.)	3

WELL SCHEMATIC*



COMMENTS: EXPOSED 2" PVC WELL UNDER ASPHALT COLD PATCH, TREMIE GROUT ABANDONED

* Sketch in all relevant decommissioning data, including: interval overdrilled, interval grouted, casing left in hole, well stickup, etc.

Drilling Contractor

Department Representative

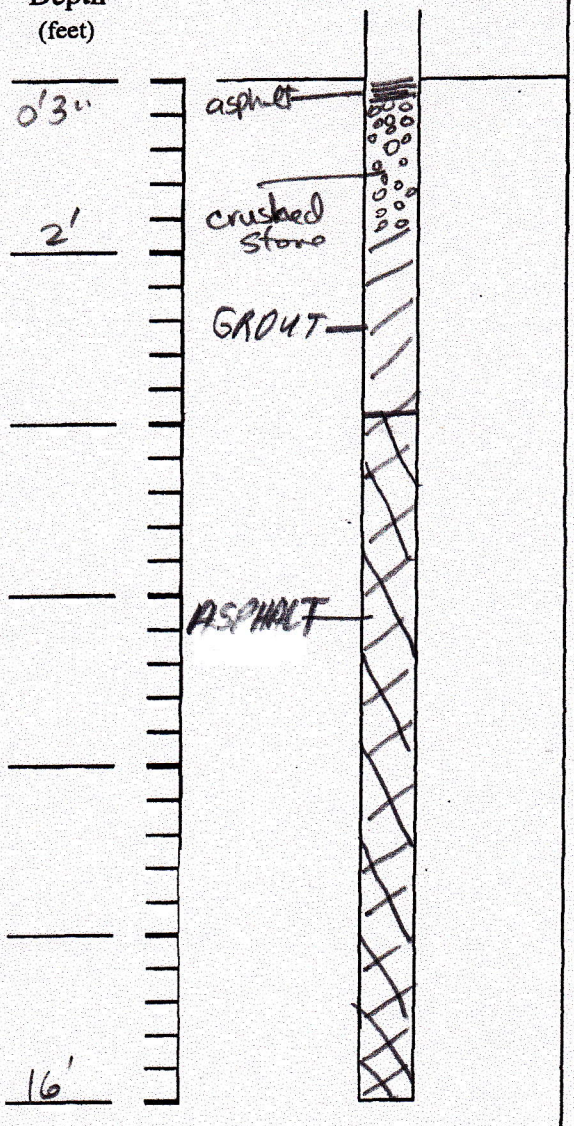
WELL DECOMMISSIONING RECORD

Site Name: GREGORY ST. WELL CLOSURES ROCHESTER, NY	Well I.D.: MW-2 MW-112
Site Location: GREGORY ST. ROCHESTER, NY	Driller: N. SHORT
Drilling Co.: NOTHNAGLE DRILLING	Inspector: DORTHY BAUCH-BAKER
	Date: AUG. 15, 2011

DECOMMISSIONING DATA
(Fill in all that apply)

OVERDRILLING	
Interval Drilled	
Drilling Method(s)	
Borehole Dia. (in.)	
Temporary Casing Installed? (y/n)	
Depth temporary casing installed	
Casing type/dia. (in.)	
Method of installing	
CASING PULLING	
Method employed	
Casing retrieved (feet)	
Casing type/dia. (in)	
CASING PERFORATING	
Equipment used	
Number of perforations/foot	
Size of perforations	
Interval perforated	
GROUTING	
Interval grouted (FBLS)	16'
# of batches prepared	1
For each batch record:	
Quantity of water used (gal.)	10
Quantity of cement used (lbs.)	94
Cement type	I/II
Quantity of bentonite used (lbs.)	4
Quantity of calcium chloride used (lbs.)	none
Volume of grout prepared (gal.)	12
Volume of grout used (gal.)	3

WELL SCHEMATIC*



COMMENTS: EXPOSED 2" PVC WELL UNDER ASPHALT COLD PATCH. TREMIE GROUT ABANDONED ABOVE ASPHALT

* Sketch in all relevant decommissioning data, including: interval overdrilled, interval grouted, casing left in hole, well stickup, etc.

Drilling Contractor

Department Representative

APPENDIX B

Bare dirt
4/9/12

Bare dirt
4/9/12

Enclosure 2

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

Site Details **Box 1**

Site No. **C828091**

Site Name Davidson Collision

Site Address: 399 GREGORY STREET Zip Code: 14620
City/Town: Rochester
County: Monroe
Site Acreage: 0.5

Reporting Period: October 05, 2010 to April 05, 2012

	YES	NO
1. Is the information above correct?	☒	☐
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?	☐	☒
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	☐	☒
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	☐	☒
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?	☐	☒

Box 2

	YES	NO
6. Is the current site use consistent with the use(s) listed below? Restricted-Residential, Commercial, and Industrial	☒	☐
7. Are all ICs/ECs in place and functioning as designed?	☒	☐

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.

Mark D. Gregory CHMM 06481 — 5-3-2012

Signature of Owner, Remedial Party or Designated Representative — Date

Box 2A

	YES	NO
8. Has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid?	☐	☒
9. Are the assumptions in the Qualitative Exposure Assessment still valid? (The Qualitative Exposure Assessment must be certified every five years)	☒	☐

If you answered YES to question 8, include documentation or evidence that documentation has been previously submitted with this certification form.

If you answered NO to question 9, the Periodic Review Report must include an updated Qualitative Exposure Assessment based on the new assumptions.

SITE NO. C828091

Box 3

Description of Institutional Controls

Parcel	Owner	Institutional Control
121.650-0001-053.000	City of Rochester	Ground Water Use Restriction IC/EC Plan Landuse Restriction Monitoring Plan Site Management Plan Soil Management Plan
121.650-0001-053.000	City of Rochester	

Box 4

Description of Engineering Controls

Parcel	Engineering Control
121.650-0001-053.000	Vapor Mitigation

Engineering Control Details for Site No. C828091

Engineering Control Details for Site No. C828091

Parcel: 121.650-0001-053.000

The Controlled Property may be used for restricted residential use as described within 6 NYCRR Part 375-1.8 (g) (2) (ii), as long as the following long-term engineering controls are employed and the land use restrictions specified below are adhered to:

(1) All Engineering Controls must be operated and maintained as specified in the Site Management Plan (SMP).

(2) All Engineering Controls on the Controlled Property must be inspected at a frequency and in a manner defined in the SMP.

(3) Groundwater and other environmental or public health monitoring must be performed as defined in the SMP.

(4) Data and information pertinent to Site Management of the Controlled Property must be reported at the frequency and in a manner defined in the SMP.

(5) All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with the SMP.

(6) The use of the groundwater underlying the property is prohibited without treatment rendering it safe for its intended use.

(7) The potential for vapor intrusion must be evaluated for any buildings developed on the property, and any potential impacts that are identified must be monitored or mitigated.

(8) The site will be entered into the City of Rochester Building Information flagging system such that all future permit applications will need to be reviewed by the Division of Environmental Quality for compliance with the conditions identified herein.

(9) Sub-slab Depressurization System (SSDS) - If a SSDS is installed, the SSDS will not be discontinued unless prior written approval is granted by the NYSDEC. In the event that monitoring data indicates that the SSDS is no longer required, a proposal to discontinue the SSDS will be submitted by the property owner to the NYSDEC and New York State Department of Health.

(10) Monitored Natural Attenuation - Groundwater monitoring activities to assess natural attenuation will continue, as determined by the NYSDEC, if groundwater contaminant levels become asymptotic at a level that is not acceptable to the NYSDEC, additional source removal, treatment and/or control measures will be evaluated as defined in the SMP.

Box 5

Periodic Review Report (PRR) Certification Statements

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

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

   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 compete.

YES	NO
☒	☐

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

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

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

   (c) 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.

CHMM 06481

Signature of Owner, Remedial Party or Designated Representative

5-3-2012

Date

IC CERTIFICATIONS
SITE NO. C828091

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 MARK D. GREGOR (print name) at CITY OF ROCHESTER, 30 CHURCH ST ROOM 300B, ROCHESTER, NY 14614 (print business address)

am certifying as representative OF the City of Rochester, NY (Owner or Remedial Party)

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

Mark D Gregor CHMM 06481
Signature of Owner, Remedial Party, or Designated Representative Rendering Certification

5-3-2012
Date

IC/EC CERTIFICATIONS

Box 7

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 MARK D. GREGOR (print name) at 30 CHURCH ST ROOM 300B, ROCHESTER, NY 1464 (print business address)

am certifying as a for the CITY OF ROCHESTER NY (Owner or Remedial Party)

CHMM 06481

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

Stamp (Required for PE)

5-3-2012

Date