

DECISION DOCUMENT

Former Alliance Metal Stamping & Fabrication
Brownfield Cleanup Program
Gates, Monroe County
Site No. C828101
December 2021



**Department of
Environmental
Conservation**

Prepared by
Division of Environmental Remediation
New York State Department of Environmental Conservation

DECLARATION STATEMENT - DECISION DOCUMENT

Former Alliance Metal Stamping & Fabrication
Brownfield Cleanup Program
Gates, Monroe County
Site No. C828101
December 2021

Statement of Purpose and Basis

This document presents the remedy for the Former Alliance Metal Stamping & Fabrication site, a brownfield cleanup site. The remedial program was chosen in accordance with the New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR) Part 375.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the Former Alliance Metal Stamping & Fabrication site and the public's input to the proposed remedy presented by the Department.

Description of Selected Remedy

During the investigation certain actions, known as interim remedial measures (IRMs), were undertaken at the above referenced site. An IRM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the remedial investigation (RI) or alternatives analysis (AA). The IRM(s) undertaken at this site are discussed in Section 6.2.

Based on the implementation of the IRM(s), the findings of the investigation of this site indicate that the site no longer poses a threat to human health or the environment; therefore, No Further Action is the selected remedy. The remedy may include continued operation of a remedial system if one was installed during the IRM and the implementation of any prescribed institutional controls/engineering controls (ICs/ECs) that have been identified as being part of the proposed remedy for the site.

Declaration

The remedy conforms with promulgated standards and criteria that are directly applicable, or that are relevant and appropriate and takes into consideration Department guidance, as appropriate. The remedy is protective of public health and the environment.

12/15/21

Michael Cruden

Date

Michael Cruden, Director
Remedial Bureau E

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Site No. C828101
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SECTION 1: SUMMARY AND PURPOSE

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), has selected a remedy for the above referenced site. The disposal of contaminants at the site resulted in threats to public health and the environment that were addressed by actions known as interim remedial measures (IRMs), which were undertaken at the site. An IRM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the remedial investigation (RI) or alternative analysis (AA). The IRMs undertaken at this site are discussed in Section 6.2.

Based on the implementation of the IRM(s), the findings of the investigation of this site indicate that the site no longer poses a threat to human health or the environment. The IRM(s) conducted at the site attained the remediation objectives identified for this site, which are presented in Section 6.5, for the protection of public health and the environment. No Further Action is the selected remedy. A No Further Action remedy may include continued operation of any remedial system installed during the IRM and the implementation of any prescribed controls that have been identified as being part of the remedy for the site. This Decision Document identifies the IRM(s) conducted and discusses the basis for No Further Action.

The New York State Brownfield Cleanup Program (BCP) is a voluntary program. The goal of the BCP is to enhance private-sector cleanups of brownfields and to reduce development pressure on "greenfields." A brownfield site is real property, where a contaminant is present at levels exceeding the soil cleanup objectives or other health-based or environmental standards, criteria or guidance, based on the reasonably anticipated use of the property.

The Department has issued this document in accordance with the requirements of New York State Environmental Conservation Law and 6 NYCRR Part 375. This document is a summary of the information that can be found in the site-related reports and documents.

SECTION 2: CITIZEN PARTICIPATION

The Department seeks input from the community on all remedies. A public comment period was held, during which the public was encouraged to submit comment on the proposed remedy. All comments on the remedy received during the comment period were considered by the Department in selecting a remedy for the site. Site-related reports and documents were made available for review by the public at the following document repository:

Gates Public Library
Attn: Ms. Karen Kase-McLaren
902 Elmgrove Road
Rochester, NY 14624
Phone: (585) 247-6446

NYSDEC Region 8 Headquarters
(by appointment)
6274 Avon-Lima Road
Avon, NY 14414
(585) 226-5480

Project documents may also be accessed online through the DECinfo Locator:
<https://www.dec.ny.gov/data/DecDocs/C828101//>.

Receive Site Citizen Participation Information By Email

Please note that the Department's Division of Environmental Remediation (DER) is "going paperless" relative to citizen participation information. The ultimate goal is to distribute citizen participation information about contaminated sites electronically by way of county email listservs. Information will be distributed for all sites that are being investigated and cleaned up in a particular county under the State Superfund Program, Environmental Restoration Program, Brownfield Cleanup Program, Voluntary Cleanup Program, and Resource Conservation and Recovery Act Program. We encourage the public to sign up for one or more county listservs at <http://www.dec.ny.gov/chemical/61092.html>

SECTION 3: SITE DESCRIPTION AND HISTORY

Location: The 7-acre Former Alliance Metal Stamping and Fabrication Facility site is located in the Pixley Industrial Park in a suburban area in the Town of Gates, Monroe County and occupies Tax Parcel 119.17-1-2.

Site Features: The site is relatively flat and includes one occupied 120,000 square foot building with commercial / light industrial, warehousing and recreational (gymnastics) tenants.

Current Zoning/Uses: The site is zoned General Industrial and is surrounded by commercial and industrial properties. A large movie theater parking lot and commercial district borders the site to the north, while commercial and industrial properties border the site to the south, east and west. The nearest residential area is more than 2000 feet south southeast and west of the site.

Historical Uses: The property was undeveloped agricultural land until 1967, when the Alliance Metal Stamping and Fabrication (AMSF) facility was constructed. AMSF operations occurred from approximately 1967 until approximately 1995 and included stamping, forming, cleaning, grinding, painting, and deburring metals.

Site Geology and Hydrogeology: Overburden deposits at the site consist of glacio-lacustrine

sediments which are not typically saturated, and the water table occurs below the top of bedrock. The depth to bedrock varies between 10-15 feet below ground surface (bgs) across the site. The direction of groundwater flow in the shallow bedrock zone is generally to the north and northeast. Five storm water recharge wells on the property collect runoff and alter the flow patterns during precipitation events. No federal or state designated wetlands, streams, ponds or lakes are located on the Site or immediately adjacent properties. There is a stormwater retention pond located some distance away on an adjacent property northeast of the site.

A site location map is attached as Figure 1.

SECTION 4: LAND USE AND PHYSICAL SETTING

The Department may consider the current, intended, and reasonably anticipated future land use of the site and its surroundings when evaluating a remedy for soil remediation. For this site, alternatives that restrict(s) the use of the site to commercial use (which allows for industrial use) as described in Part 375-1.8(g) were evaluated in addition to an alternative which would allow for unrestricted use of the site.

A comparison of the results of the investigation to the appropriate standards, criteria and guidance values (SCGs) for the identified land use and the unrestricted use SCGs for the site contaminants is available in the Remedial Investigation (RI) Report.

SECTION 5: ENFORCEMENT STATUS

The Applicant under the Brownfield Cleanup Agreement is a Volunteer. The Volunteer does not have an obligation to address off-site contamination. The Department has determined that this site poses a significant threat to human health and the environment, and there are off-site impacts that require remedial activities; accordingly, enforcement actions are necessary.

The Department will seek to identify any parties (other than the Volunteer) known or suspected to be responsible for contamination at or emanating from the site, referred to as Potentially Responsible Parties (PRPs). The Department will bring an enforcement action against the PRPs. If an enforcement action cannot be brought, or does not result in the initiation of a remedial program by any PRPs, the Department will evaluate the off-site contamination for action under the State Superfund. The PRPs are subject to legal actions by the State for recovery of all response costs the State incurs or has incurred.

SECTION 6: SITE CONTAMINATION

6.1: Summary of the Remedial Investigation

A remedial investigation (RI) serves as the mechanism for collecting data to:

- characterize site conditions;
- determine the nature of the contamination; and
- assess risk to human health and the environment.

The RI is intended to identify the nature (or type) of contamination which may be present at a site and the extent of that contamination in the environment on the site, or leaving the site. The RI reports on data gathered to determine if the soil, groundwater, soil vapor, indoor air, surface water or sediments may have been contaminated. Monitoring wells are installed to assess groundwater and soil borings or test pits are installed to sample soil and/or waste(s) identified. If other natural resources are present, such as surface water bodies or wetlands, the water and sediment may be sampled as well. Based on the presence of contaminants in soil and groundwater, soil vapor will also be sampled for the presence of contamination. Data collected in the RI influence the development of remedial alternatives. The RI report is available for review in the site document repository and the results are summarized in section 6.3.

The analytical data collected on this site includes data for:

- groundwater
- soil
- soil vapor
- indoor air
- sub-slab vapor

6.1.1: Standards, Criteria, and Guidance (SCGs)

The remedy must conform to promulgated standards and criteria that are directly applicable or that are relevant and appropriate. The selection of a remedy must also take into consideration guidance, as appropriate. Standards, Criteria and Guidance are hereafter called SCGs.

To determine whether the contaminants identified in various media are present at levels of concern, the data from the RI were compared to media-specific SCGs. The Department has developed SCGs for groundwater, surface water, sediments, and soil. The NYSDOH has developed SCGs for drinking water and soil vapor intrusion. For a full listing of all SCGs see: <http://www.dec.ny.gov/regulations/61794.html>

6.1.2: RI Results

The data have identified contaminants of concern. A "contaminant of concern" is a contaminant that is sufficiently present in frequency and concentration in the environment to require evaluation for remedial action. Not all contaminants identified on the property are contaminants of concern. The nature and extent of contamination and environmental media requiring action are summarized below. Additionally, the RI Report contains a full discussion of the data. The contaminant(s) of concern identified at this site is/are:

1,1,1-trichloroethane (TCA)
tetrachloroethene (PCE)

trichloroethene (TCE)
benzo(a)pyrene

Based on the investigation results, comparison to the SCGs, and the potential public health and environmental exposure routes, certain media and areas of the site required remediation. These

media were addressed by the IRMs described in Section 6.2. More complete information can be found in the RI Report and the IRM Construction Completion Report.

6.2: Interim Remedial Measures

An interim remedial measure (IRM) is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before issuance of the Decision Document.

The following IRMs have been completed at this site based on conditions observed during the RI.

IRM - Soil Vapor Mitigation / Modify Storm Water Recharge Well / Soil Cover

Sub-slab depressurization systems were installed and provide 100% building coverage to address potential soil vapor intrusion of volatile organic compounds in sub-slab soil vapor. An Operations Maintenance and Monitoring (OM&M) plan was developed and implemented which ensures that the sub-slab depressurizations systems remain effective and operational.

The lower portion of recharge well #2 (60-110 feet bgs) used for storm water management was cleaned and permanently sealed to mitigate the potential vertical migration of volatile organic compounds in groundwater.

Cover systems consisting of buildings, pavement and/or one foot of soil meeting restricted commercial soil cleanup objectives (CSCOs) is present across most the site. For the remaining areas in the southern and eastern areas, a soil cover consisting of 1 foot of soil over a demarcation layer was installed to eliminate the potential for exposure to soils exceeding CSCOs. CSCOs were exceeded in shallow surface soils for semi-volatile organic compounds (SVOCs), including benzo(a)pyrene at 1.5 ppm (CSCO of 1 ppm).

IRM-Interim Site Management Plan (ISMP)

An ISMP including annual indoor air monitoring was implemented during the remedial program (2016-2021). Corrective actions were performed to seal floor cracks and penetrations (roof drains) prior to the IRMs (SSDS 2019).

6.3: Summary of Environmental Assessment

This section summarizes the assessment of existing and potential future environmental impacts presented by the site. Environmental impacts may include existing and potential future exposure pathways to fish and wildlife receptors, wetlands, groundwater resources, and surface water. The RI report presents a detailed discussion of any existing and potential impacts from the site to fish and wildlife receptors.

Nature and Extent of Contamination:

The remedial investigation defined the nature and extent of contamination in soil, groundwater, soil vapor and indoor air at the site. Volatile Organic Compounds (VOC) impacts were documented in soil, groundwater and soil vapor.

Soil: Extensive sampling of soils to bedrock did not identify a source of VOC contamination. Three areas of VOC-impacted soil were delineated under the building, slightly exceeding the protection of groundwater guidance values in the former degreaser, former waste storage, and former paint shop areas. VOC-impacted soil did not extend outside the building footprint.

Groundwater Overburden: An overburden groundwater unit was not encountered.

Groundwater Shallow Rock: PCE, TCE and TCA are primary contaminants of concern in shallow bedrock groundwater at this site. Contaminant concentrations in site groundwater exceed NYS Part 703 Groundwater Quality Standards of 5 parts per billion (ppb) for each of these compounds. The highly weathered and fractured formation has an elevated hydraulic conductivity.

The most significant area of contaminated groundwater has been delineated in the northwest corner of the site. Contaminant concentrations in this area during the RI were as high as 5,900 ppb of TCA, 22 ppb of TCE and 5.8 ppb of PCE and have declined in a consistent trend over three to four rounds of sampling. Considering all historic and RI data and actions including the 1999 removal of TCA contaminated soil from the adjacent Former ITT Rochester Form Machine site #828112, significant reduction in contaminant concentrations have been documented in 14 rounds of sampling conducted over 23 years (*e.g.*, MW-7 TCA concentrations declined from 111,000 ppb to 11 ppb).

Two other discrete areas of groundwater contamination have been delineated and are co-located near former degreasing and painting/hazardous waste storage operations.

Contaminant concentrations in the former degreaser area were as high as 930 ppb PCE, 15 ppb TCE and 420 ppm TCA. Significant variations in contaminant concentrations between highs/lows have been documented in four rounds of sampling conducted over two years, and a consistent contaminant trend is not apparent.

Contaminant concentrations in the former painting/hazardous waste storage area were as high as 77 ppb of PCE, 60 ppb of TCE and 930 ppb of TCA. Including pre-RI data, significant variations in contaminant concentrations between highs/lows have been documented in 12 rounds of sampling conducted over 23 years, and the overall contaminant trend is on a steadily declining slope.

Groundwater Intermediate Rock: The dense, less fractured formation has a lower hydraulic conductivity and therefore delineated contaminant impacts were of limited lateral extent and declining vertical contaminant trend through the formation. RI sampling in the northwest corner has demonstrated a slight increasing vertical contaminant trend in AMSF-MW-16i.

Groundwater Deep Rock: The dense formation has a low hydraulic conductivity and therefore delineated contaminant impacts were of limited lateral extent and declining vertical contaminant trend through the formation. One exception is contaminant conditions at recharge well RW-2 (TCA 130 ppb / pre-RI 1994), where conceptual site modeling depicts vertical drop of contaminants from the upper formation in this open core recharge well.

Recharge Wells: Five shallow and deep injection wells exist at the site and were designed to facilitate site storm water drainage. Recharge wells RW-2 and RW-3 located in the northwest corner of the site were investigated as potential disposal wells due to elevated levels of contaminant(s) of concern. Characterization of these structures, including camera/video inspection of connecting pipes confirmed that the recharge wells accept only roof and surface runoff.

Groundwater Flow / Contaminant Migration: The highly conductive shallow water bearing formation is responsible for the most significant lateral migration of contaminants to and from the site. Area use of this formation for stormwater management may provide remedial benefit to contaminant reduction through hydrolysis. Groundwater flow direction is generally from the southwest to the northeast. On-site groundwater exceeding NYS Part 703 Groundwater Quality Standards migrates to the north and east of the site. The adjoining commercial property to the north is used for parking and properties to the east have commercial/industrial buildings. Pre-RI data suggests that groundwater exceeding NYS Part 703 Groundwater Quality Standards may have migrated on-site from the south and west.

Sub-slab Soil Vapor: PCE, TCE and TCA are primary contaminants of concern in sub-slab soil vapor at this site and exceed NYSDOH soil vapor intrusion guidance recommended action levels for mitigation. Concentrations of these contaminants were as high as 833 micrograms per cubic meter (mg/m³) PCE (1,400 mg/m³ pre-RI), 4.7 mg/m³ TCE (7 mg/m³ pre-RI) and 45 mg/m³ TCA (55 mg/m³ pre-RI).

Indoor Air: PCE, TCE and TCA are primary contaminants of concern in indoor air at this site and exceed NYSDOH Soil Vapor Intrusion Guidance recommended action levels for mitigation. Concentrations of these contaminants were as high as 18.1 micrograms per cubic meter (ug/m³) PCE (28 ug/m³ pre-RI), 2.6 ug/m³ TCE (45 ug/m³ pre-RI) and 7.5 ug/m³ TCA (24 ug/m³ pre-RI). Annual indoor air monitoring is conducted under the ISMP until the final remedy is implemented. Indoor air monitoring results in 2016 identified two locations slightly exceeding the NYSDOH indoor air guidance value for TCE (2.0 ug/m³) and five locations for PCE (30.0 ug/m³). One location (automotive repair) exceeded the NYSDOH recommended immediate action value of 300 ug/m³ for PCE in indoor air. A potential indoor air source of PCE was identified and corrective measures consisting of removing the source, and sealing floor cracks were implemented. Indoor air was retested, and results were below NYSDOH indoor air guidance values.

Off-site Contamination: A Qualitative Human Health Exposure Assessment regarding off-site migration of contaminated groundwater has been completed and concludes that additional delineation of contamination in groundwater, soil vapor and an evaluation of soil vapor intrusion in off-site structures is necessary. Off-site work will be addressed by NYSDEC.

6.4: Summary of Human Exposure Pathways

This human exposure assessment identifies ways in which people may be exposed to site-related contaminants. Chemicals can enter the body through three major pathways (breathing, touching or swallowing). This is referred to as *exposure*.

People are not drinking the contaminated groundwater because the area is served by a public water supply that is not contaminated by the site. Direct contact with contaminants in the soil is unlikely because the site is covered by buildings and pavement. Volatile organic compounds in soil or groundwater may move into the soil vapor (air spaces within the soil), which in turn may move into overlying buildings and affect indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. A sub-slab depressurization system has been installed in the on-site building to address the potential for exposure. Additional investigation is needed to determine whether actions are needed to address soil vapor intrusion off-site.

6.5: Summary of the Remediation Objectives

The objectives for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375. The goal for the remedial program is to restore the site to pre-disposal conditions to the extent feasible. At a minimum, the remedy shall eliminate or mitigate all significant threats to public health and the environment presented by the contamination identified at the site through the proper application of scientific and engineering principles.

The remedial action objectives for this site are:

Groundwater

RAOs for Public Health Protection

- Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards.
- Prevent contact with, or inhalation of volatiles, from contaminated groundwater.

RAOs for Environmental Protection

- Restore ground water aquifer to pre-disposal/pre-release conditions, to the extent practicable.

Soil

RAOs for Public Health Protection

- Prevent ingestion/direct contact with contaminated soil.
- Prevent inhalation of or exposure from contaminants volatilizing from contaminants in soil.

RAOs for Environmental Protection

- Prevent migration of contaminants that would result in groundwater or surface water contamination.

Soil Vapor

RAOs for Public Health Protection

- Mitigate impacts to public health resulting from existing, or the potential for, soil vapor intrusion into buildings at a site.

SECTION 7: ELEMENTS OF THE SELECTED REMEDY

Based on the results of the investigations at the site, the IRMs that have been performed, and the evaluation presented here, the Department is proposing No Further Action as the remedy for the site. This No Further Action remedy includes continued operation of the Soil Vapor Intrusion Mitigation Sub-slab Depressurization System and the implementation of Institutional and Engineering Controls (ICs/ECs) to restrict the site to commercial use, maintain cover systems and monitor indoor air and groundwater as part of site management (Figs. 2 - 3). The Department believes this remedy is protective of human health and the environment and satisfies the remediation objectives described in Section 6.5.

The elements of the IRMs already completed and the institutional and engineering controls are listed below:

1. Institutional Control

Imposition of an institutional control in the form of an environmental easement for the controlled property which will:

- the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
- the use and development of the controlled property for restricted commercial use as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County DOH; and
- compliance with the Department approved Site Management Plan.

2. Site Management Plan

A Site Management Plan is required, which includes the following:

- a.) an Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective:

Institutional Controls: The Environmental Easement discussed in Item 1 above.

Engineering Controls: The site cover system and the sub-slab depressurization system discussed in Paragraph 6.2 above.

This plan includes, but may not be limited to:

- Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;

- provision should redevelopment occur to ensure no soil exceeding protection of groundwater concentrations will remain below storm water retention basin or infiltration structures.
 - of the provisions of the environmental easement including any land use, and groundwater use restrictions;
 - provision for evaluation of the potential for soil vapor intrusion for any new occupied buildings on the site, including provision for implementing actions recommended to address exposures related to soil vapor;
 - provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in Paragraph 2 above will be placed in any areas where the upper one foot of exposed surface soil exceed the applicable soil cleanup objectives (SCOs);
 - for the management and inspection of the identified engineering controls;
 - site access controls and Department notification; and the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.
- b.) a Monitoring Plan to assess the performance and effectiveness of the remedy (Fig 4). The plan includes, but may not be limited to:
- monitoring of groundwater to assess the performance and effectiveness of the remedy;
 - monitoring of indoor air to assess the performance and effectiveness of the remedy;
 - a schedule of monitoring and frequency of submittals to the Department;
 - monitoring for vapor intrusion for any buildings on the site, as may be required by the Institutional and Engineering Control Plan discussed above.
- c.) an Operation and Maintenance (O&M) Plan to ensure continued operation, maintenance, inspection, and reporting of any mechanical or physical components of the active vapor mitigation system(s). The plan includes, but is not limited to:
- procedures for operating and maintaining the system(s); and
 - compliance inspection of the system(s) to ensure proper O&M as well as providing the data for any necessary reporting.



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Legend

AREAS OF SOIL COVER
SF - SQUARE FEET
AC. - ACRES

Notes

Revision _____
By _____ Appoi.
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Permit-to-Start _____

Client/Project

FORMER ALLIANCE METAL STAMPING & FABRICATION FACILITY
BROWNFIELD CLEANUP PROGRAM SITE # C828101

12 PIXLEY INDUSTRIAL PARKWAY, GATES, NY

	<u>Title</u>
1	1. Title of the report
2	2. Author's name
3	3. Date of the report
4	4. Place of the report
5	5. Subject of the report
6	6. Summary of the report
7	7. Introduction
8	8. Methodology
9	9. Results
10	10. Conclusion
11	11. References
12	12. Appendix
13	13. Glossary
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INSTITUTIONAL CONTROL BOUNDARIES

NFA Decision Document
Figure 2 - BCP Boundary





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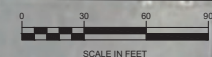
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AREAS OF SOIL COVER
SF - SQUARE FEET
AC. - ACRES

**NOTE:
MONITORING WELL
LOCATIONS ARE SHOWN
ON FIGURE 4**

COVER SYSTEM AREA BOUNDARY



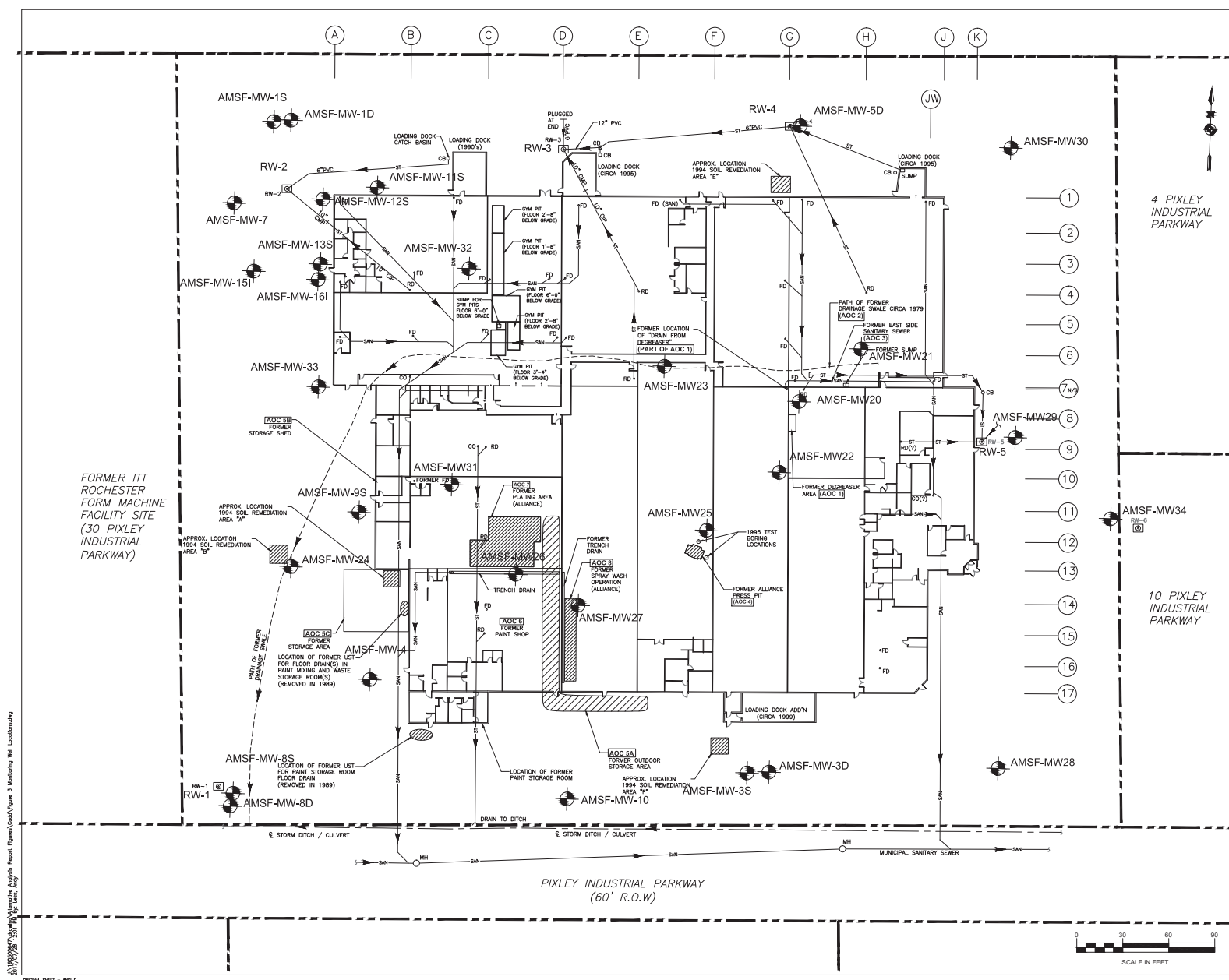
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BROWNFIELD CLEANUP PROGRAM SITE # C828101

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Title

NFA Decision Document
Figure 3
Engineering Controls
SSDS & Cover Systems



NFA Decision Document
Figure 4
Groundwater Monitoring