BROWNFIELD CLEANUP PROGRAM DECISION DOCUMENT

Rochester Drug Cooperative Building Site City of Rochester, Monroe County New York Site No. C8-28-115 November 2009

Statement of Purpose and Basis

This Brownfield Cleanup Program (BCP) Decision Document presents the remedy identified by the Department of Environmental Conservation (Department) for the Rochester Drug Cooperative Building site. The remedial program was chosen in accordance with Article 27 Title 14 of the New York State Environmental Conservation Law and the 6 NYCRR 375 regulations relative to the BCP.

Description of the Site

The Former Rochester Drug Cooperative site is a 2.7 acre property located at 320 North Goodman Street in the City of Rochester. The site is immediately adjacent to a rail yard and a commercial property and it is served by public water and sewers. Other nearby properties are a mix of residential and commercial uses. A 62,000 square-foot one and two-story building with a partial basement occupies the western portion of the property. Past uses of the site include a lumberyard, furniture manufacturing, offices, and warehousing. Currently the building is subdivided and occupied by multiple commercial/industrial tenants.

Previous investigations at the site identified significant petroleum contamination in soil and groundwater. The source of this contamination was four underground storage tanks that were formerly located on the eastern portion of the property. Two tanks were reportedly removed in the early 1970's and one tank was removed in 1998. There is no closure documentation for the fourth tank.

An IRM soil removal was completed in April 2005, and no tanks were encountered during excavations. Contaminated soils were treated in an on-site bio-pile. Petroleum contaminants in groundwater have been significantly reduced and only low levels remain on a portion of the site. A sub-slab depressurization system (SSDS) is operating at the on-site building to mitigate the potential for soil vapor intrusion. The site is capped by an asphalt parking lot and the on-site building. A site management plan has been developed to address periodic groundwater monitoring, continued operation of the SSDS, and management of residual contamination in subsurface soils.

Nature and Extent of Contamination

Petroleum contaminated soils and groundwater at levels as high 2,100 ppm total petroleum-related VOCs in soil and 100 ppm total petroleum-related VOCs in groundwater were documented by previous investigation reports. Approximately 2,100 cubic yards of petroleum contaminated soils were excavated in 2005 and were treated in an ex-situ bio-pile adjacent to the site. The excavations extended to bedrock which is approximately 15 feet below ground surface. Approximately 40,000 gallons of contaminated groundwater were collected and disposed of off-site during these soil excavations.

After completion of the soil removal, a groundwater investigation and monitoring program was implemented, and a SSDS was installed in the on-site building. Petroleum contamination in groundwater has been significantly reduced to levels ranging from non-detect to 90 ppb total VOCs. Residual levels of petroleum-related VOC compounds remain in subsurface soil along the southern property line. A site management plan has been developed to address continued groundwater monitoring, operation of the SSDS, and management of residual contamination in soils. An environmental easement will be executed at the site to ensure the SMP is implemented on-site.

No further actions will be required on-site at this time. The SSDS will continue to operate and the most recent groundwater data indicate a significant decrease in VOC contamination in groundwater (see attached Labella Figure 7 and Table 10). The current site conditions do not pose a significant threat to public health or the environment.

<u>Nature of contamination</u>: The primary contaminants of concern at this site are the following petroleum-related VOCs: toluene, total xylenes, and ethylebenzene. These aromatic VOCs are typical components of petroleum fuels, are mobile in groundwater, and readily biodegrade aerobically.

Extent of contamination

Source areas/Waste disposal - There were four petroleum underground storage tanks (USTs) located on the eastern portion of the site which were reported removed in the 1970s and 1980s. Soil contamination from the former USTs was excavated and removed during the soil removal IRM in 2005.

Surface soil - The entire surface is either paved or occupied by the building with the exception of landscaped islands in the parking lot. These islands were constructed after the soil removal project with imported top soil.

Groundwater - Prior to the soil removal IRM, groundwater concentrations were as high as 2,100 ppm of total petroleum-related VOCs. Since completion of the soil removal, groundwater concentrations of petroleum-related VOCs range from ND to 90 ppb.

Description of the Remedy

Based on the results of the alternatives analysis and the criteria identified for evaluation of alternatives, the NYSDEC has selected a Track 4 for this BCP site. The components of the remedy set no further action as the proposed selected alternative. The soil removal IRM has removed contaminated soil to bedrock. Follow up groundwater sampling has indicated that the levels of contaminants have been significantly reduced from pre-IRM levels of 2,100 ppm of total VOCs to 90 ppb total VOCs after the soil removal. Residual subsurface soil contamination in the vicinity of the utility corridor located at the southern property boundary does not appear to be significantly impacting groundwater. A SMP has been developed to implement groundwater monitoring on a periodic basis, to manage residual subsurface soil contamination for any future excavations, to evaluate SVI for any future buildings, and to operate and maintain the SSDS installed in the on-site building. An environmental easement will be placed on the site which will prohibit groundwater use, restrict the site to commercial or industrial use and require periodic certification that the SMP is being implemented. Because the site will no longer pose a threat to the public health or the environment, no further actions will be required.

Declaration

The selected remedy is protective of human health and the environment, complies with State and Federal requirements that are legally applicable or relevant and appropriate to the remedial action and will allow for the identified use of the site. This remedy utilizes permanent solutions and alternative treatment to the maximum extent practicable, and satisfies the preference for remedies that reduce remove or otherwise treat or contain sources of contamination and protection of groundwater.

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