DECISION DOCUMENT

690 Saint Paul Street - Off-Site
Brownfield Cleanup Program
Rochester, Monroe County
Site No. C828159A
December 2019

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

DECLARATION STATEMENT - DECISION DOCUMENT

690 Saint Paul Street - Off-Site
Brownfield Cleanup Program
Rochester, Monroe County
Site No. C828159A
December 2019

Statement of Purpose and Basis

This document presents the remedy for the 690 Saint Paul Street - Off-Site 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 690 Saint Paul Street - Off-Site site and the public's input to the proposed remedy presented by the Department.

Description of Selected Remedy

During the course of 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.

12/6/2019

Date

Michael Cruden, Director
Remedial Bureau E

DECISION DOCUMENT

690 Saint Paul Street - Off-Site
Rochester, Monroe County
Site No. C828159A
December 2019

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 DD 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, the redevelopment or reuse of which may be complicated by the presence or potential presence of a contaminant.

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 comments 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 repositories:

Central Library of Rochester and Monroe County
115 South Avenue
Rochester, NY 14604-1896
Phone: 585-428-7300

Rochester City School District Offices
131 W Broad St
Rochester, NY 14614-1187
Phone: (585) 262-8100

Phillis Wheatley Community Library
33 Dr. Samuel McCree Way
Rochester, NY 14608
Phone: (585) 428-8212

Lincoln Branch Library
851 Joseph Avenue
Rochester, NY 14621
Phone: (585) 428-8210

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 690 Saint Paul Street site (the site) is located on the east side of Saint Paul Street in an urban area in the City of Rochester, Monroe County, just north of the intersection of Saint Paul Street and Upper Falls Boulevard. The Off-site Areas include properties on the west side of Saint Paul Street directly across from the site; including the 691 and 705 Saint Paul Street properties.

Site Features: The site covers approximately 4.7 acres. The main site features include four buildings. Three of the buildings are interconnected, seven stories tall and made of brick. The fourth building is a metal framed slab on grade structure. The Off-site Areas comprise approximately 3.7 acres and include two tax parcels and two buildings. The off-site 691 Saint Paul Street building is a six-story brick building with a footprint of 30,630 square feet. The off-site 705 Saint Paul Street building is a one-story brick building with a footprint of 10,627 square

feet.

Current Zoning and Land Use: The site and the Off-site Areas are zoned for industrial uses. The on-site buildings are partially occupied but with significant vacancy. The 691 Saint Paul Street building is occupied and in commercial use. The 705 Saint Paul Street building is occupied and used for manufacturing.

Past Use of the Site: From around 1920 until the late 1960s, the 690 Saint Paul Street site was owned and operated by Bausch & Lomb (B&L) to manufacture lenses and other products. A foundry was also present near the northeast corner of the site. Since the early 1970s, the site has been used for a variety of activities including commercial, light industrial and schools.

Prior uses that appear to have led to site contamination include underground storage tanks (USTs) that may have leaked. These tanks appear to have contained chlorinated solvents including trichloroethene (TCE) and petroleum products including gasoline and fuel oil. In 2002, a 500-gallon UST was removed from the site and contaminated soil was encountered. In 2008, an investigation was performed to determine the extent of soil and groundwater contamination associated with the 2002 tank removal. The investigation was followed by the excavation of approximately 1,650 cubic yards of petroleum impacted soil and a previously undocumented UST. Groundwater sample results from 2008 also identified an area impacted by chlorinated solvents, primarily TCE.

Based on this information, the site owner applied for and was accepted into the Brownfield Cleanup Program (BCP) in 2009. Environmental investigations conducted under the BCP identified two areas where TCE contaminated groundwater was migrating off-site to the west towards Saint Paul Street. In 2015, the site owner initiated remediation activities to prevent off-site contaminant migration to the extent feasible. In 2017, former owner/operator B&L entered into an Order on Consent with the Department to investigate and remediate impacts to off-site properties on the west side of Saint Paul Street.

Site Geology and Hydrogeology: The ground surface at the site generally slopes to the south and west. The depth to bedrock ranges from less than two feet on the southern portion of the site to twelve feet on the northern portion. The overburden consists of a combination of fill and native soil. The underlying native soil is primarily a glacial till that is up to ten feet thick. The till contains silt, sand, and gravel in varying amounts.

The Decew Dolomite (a type of bedrock) underlies the overburden at the site. The thickness of this unit is generally 8 to 12 feet. The Rochester Shale underlies the Decew Dolomite.

The depth to groundwater ranges from approximately four to nine feet below the ground surface. Groundwater generally flows to the west and is likely influenced by the Genesee River Gorge which is approximately 1,000 ft to the west/southwest. The Genesee River in this area is also about 100 ft. below the Site. The overall groundwater flow in the overburden is towards the Genesee River Gorge.

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, contaminants were not found to be migrating off-site in soils and no land use restrictions were proposed for the Off-site Areas.

SECTION 5: ENFORCEMENT STATUS

The Department and B&L entered into a Consent Order, Index No. R8-20161013-107, on February 14, 2017. The Order obligates the remedial party to implement a soil vapor intrusion remedial program for Off-site Areas.

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:

- air
- soil vapor
- 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:

trichloroethene (TCE)

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 IRM(s) described in Section 6.2. More complete information can be found in the RI 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 IRM(s) has/have been completed at this site based on conditions observed during the RI.

Soil Vapor Intrusion Mitigation IRM

Based on the results of the off-site investigation completed in 2017, TCE was detected at concentrations above the NYSDOH guidance value in the indoor air at one off-site commercial building located at 691 Saint Paul Street. Mitigation measures were recommended and implemented at the building to address indoor air contamination of volatile organic compounds associated with soil vapor intrusion. Mitigation actions included installing sub-slab ventilation systems in the basement and sub-basement and applying a vapor barrier on sub-basement walls. Construction of the mitigation system was completed in February 2018. Subsequent indoor air sampling was conducted, which indicated that the system successfully reduced indoor air concentrations of TCE to below NYSDOH guidance values. Details of the IRM will be included in the Final Engineering Report.

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.

Nature and Extent of Contamination:
Based upon investigations conducted at the 690 Saint Paul Street site, the primary contaminants of concern migrating off-site include trichloroethene (TCE) and its associated degradation products. The off-site migration pathways are groundwater and associated soil vapor. Migration of contamination was observed to the west of the site toward and across Saint Paul Street.

The off-site investigation focused on evaluating the potential for soil vapor intrusion. Sub-slab and indoor air sampling were completed at the commercial building on the west side of Saint Paul Street (691 Saint Paul Street). TCE was detected at a concentration up to 6.8 micrograms per cubic meter ($\mu g/m^3$) in the indoor air, which is above the NYSDOH guidance value of 2 $\mu g/m^3$. Sub-slab sampling results detected a maximum concentration of TCE at 220 $\mu g/m^3$. Based on these results, an IRM was completed in 2018 to install a sub-slab ventilation system in the basement and sub-basement of the building. Subsequent indoor air sampling was conducted which indicated that the system successfully reduced indoor air concentrations of TCE to below NYSDOH guidance values. Environmental sampling indicated that soil vapor intrusion was not a concern for the building at 705 Saint Paul Street.

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.*

Remedial actions are complete and measures are in place to control the potential for coming in contact with residual contamination remaining at the 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:

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 investigation of the off-site area, and the IRM that has been performed, the Department is selecting No Further Action as the remedy for the site. This No Further Action remedy includes continued operation of the soil vapor intrusion mitigation system as the selected remedy for the off-site area. The Department believes that this remedy is protective of human health and the environment and satisfies the remediation objectives described in Section 6.5.

The elements of the selected remedy are as follows:

1. Green remediation principals and techniques will be implemented to the extent feasible in the site management of the remedy as per DER-31. The major green remediation components are as follows:

• Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;

• Reducing direct and indirect greenhouse gas and other emissions;

• Increasing energy efficiency and minimizing use of non-renewable energy;

• Conserving and efficiently managing resources and materials; and

• Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste.

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

An Engineering Control Plan that identifies all engineering controls and details the steps and media-specific requirements necessary to ensure the following engineering controls remain in place and effective:

- Engineering Controls: The soil vapor intrusion mitigation system discussed above.

This plan includes, but may not be limited to:

• a provision for the evaluation of the potential for soil vapor intrusion for any new occupied off-site buildings, in areas of site-related contamination, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;

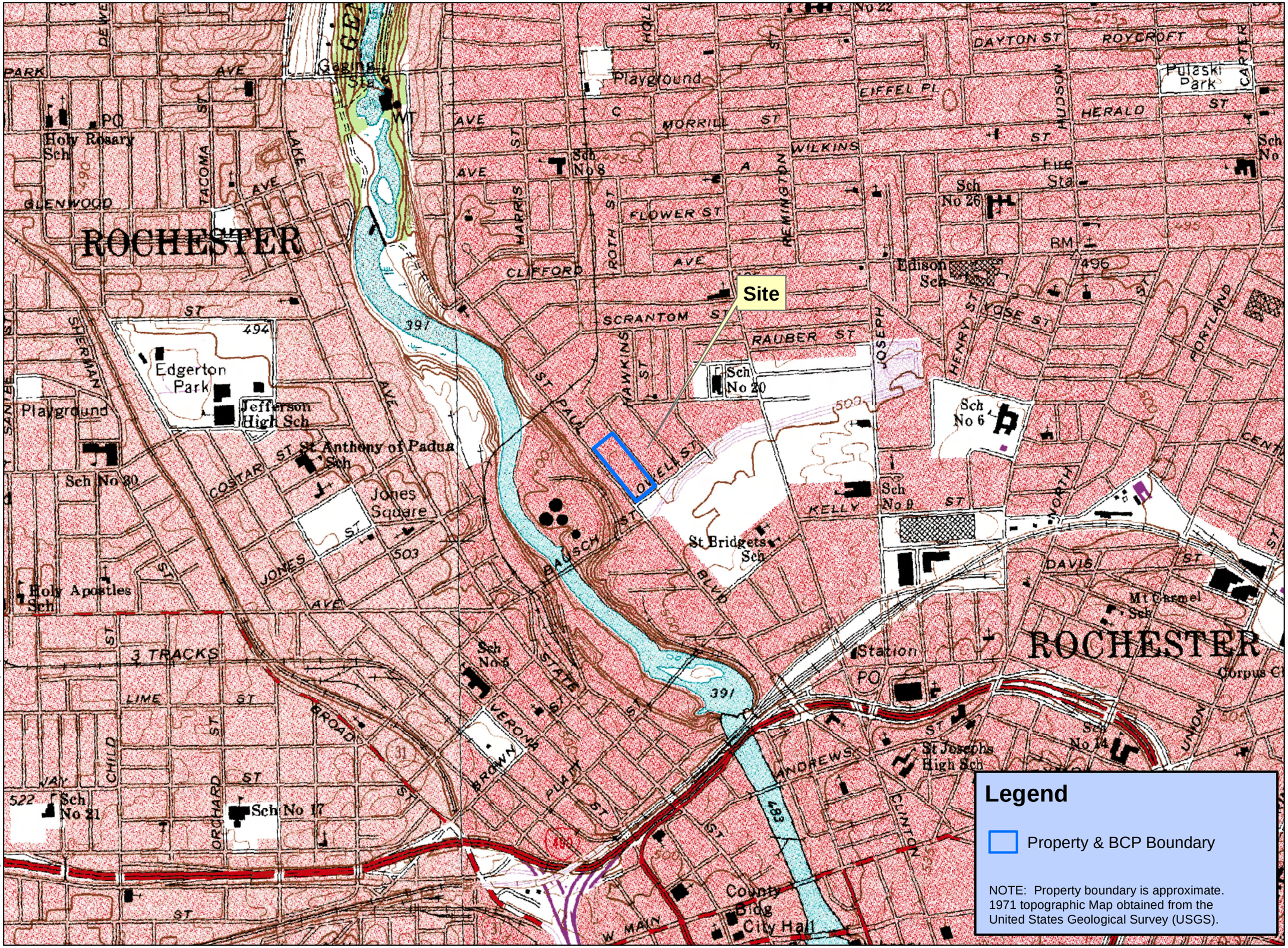
• provisions for the management and inspection of the identified engineering controls; and

• the steps necessary for the periodic reviews and certification of the engineering controls.

A Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:

• monitoring of off-site soil vapor intrusion mitigation systems to assess the performance and effectiveness of the remedy; and

• monitoring for vapor intrusion for off-site buildings, as may be required by the Engineering Control Plan discussed above.



Legend

Property & BCP Boundary

NOTE: Property boundary is approximate.
1971 topographic Map obtained from the United States Geological Survey (USGS).

I:\Barzotti Woodworking, Inc\213211 - 1445 Jefferson Rd, Phase II, ESA\Drawings\Figure2.mxd

LABELLA Associates, P.C.
300 STATE STREET
ROCHESTER, NY 14614
P: (585) 454-6110
F: (585)454-3066
www.labellapc.com

SITE LOCATION MAP

REMEDIAL INVESTIGATION REPORT:

BROWNFIELD CLEANUP PROGRAM

690 SAINT PAUL STREET
ROCHESTER, NEW YORK

VOLUNTEER:
GENESEE VALLEY REAL ESTATE COMPANY

N
W E
S

250 0 1,000

1 inch = 1,000 feet

209280

FIGURE 1

Path: i:\Bausch & Lomb\2170820 - 691 St Paul St SVI\A BCP Site\Drawings\SVI Report\Figure 2 Site Layout Map.mxd

LABELLA Associates, D.P.C.

300 STATE STREET
ROCHESTER, NY 14614
P: (585) 454-6110
F: (585)454-3066
www.labellapc.com

TITLE
SITE LAYOUT MAP

PROJECT
SOIL VAPOR INTRUSION INVESTIGATION REPORT

BROWNFIELD CLEANUP PROGRAM SITE #C828159A

691 AND 705 SAINT PAUL ST ROCHESTER, NEW YORK

CLIENT:
BAUSCH AND LOMB

STATE OF NEW YORK
DANIEL P. NOLL
No. 081696
LICENSED PROFESSIONAL ENGINEER

N E S W

0 30 60 120 Feet

1 inch = 100 feet

DATE: 8/17/2017

INTENDED TO PRINT 11"X17"

2170820

FIGURE 2