## **DECISION DOCUMENT**

Former Michelsen Furniture Co. Site Brownfield Cleanup Program Rochester, Monroe County Site No. C828189 September 2015



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

## **DECLARATION STATEMENT - DECISION DOCUMENT**

Former Michelsen Furniture Co. Site Brownfield Cleanup Program Rochester, Monroe County Site No. C828189 September 2015

#### **Statement of Purpose and Basis**

This document presents the remedy for the Former Michelsen Furniture Co. 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 Former Michelsen Furniture Co. Site site and the public's input to the proposed remedy presented by the Department.

#### **Description of Selected Remedy**

The elements of the selected remedy are as follows:

- 1. **Remedial Design:** A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and 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;
- Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;
- Maximizing habitat value and creating habitat when possible;
- Fostering green and healthy communities and working landscapes which balance ecological, economic, and social goals; and
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.
- 2. <u>Site Cover:</u> A site cover will be required to allow for restricted residential use of the site. The cover will consist either of the structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper two feet of

exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where the soil cover is required, it will be a minimum of two feet of soil placed over a demarcation layer with the upper six inches of soil of sufficient quality to maintain a vegetative layer. Soil cover material, including fill materials brought to the site, will meet the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d).

- 3. **In-situ Chemical Oxidation:** In-situ chemical oxidation (ISCO) will be implemented to treat contaminants in groundwater and soil. A chemical oxidant will be injected into the subsurface to destroy the chlorinated volatile organic compounds in the soil and groundwater adjacent to the southern portion of the existing on-site building in an approximately 2,000 square feet area via injection wells screened across the bedrock/overburden interface. It is anticipated that the oxidant will result in the treatment of some limited areas of soil contamination beneath the building. Oxidant may also be injected into monitoring wells within the building. The methodologies and depth of injections will be determined during the remedial design. In the event this technology is unsuccessful another groundwater treatment technology such as enhanced bioremediation may be evaluated and implemented in the future.
- 4. **Institutional Control:** Imposition of an institutional control in the form of an environmental easement for the controlled property that:
- Requires 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);
- Allows the use and development of the controlled property for restricted residential, commercial and industrial uses as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- Restricts 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
- Requires compliance with the Department approved Site Management Plan.
- 5. Site Management Plan: A Site Management Plan is required, which includes the following:
- A. An Institutional and Engineering Control Plan (IC/EC 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, site use restrictions, and groundwater use restriction as presented in Item#2.
  - Engineering Controls: Cover system as presented in Item #3, the SSDS installed during the IRM,, and groundwater remediation system as presented in item #4.

The SMP plan includes, but may not be limited to:

- An Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- Descriptions of the provisions of the environmental easement including any land

- use and groundwater use restrictions;
- A provision for evaluation of the potential for soil vapor intrusion for any new buildings developed on the site, 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;
- Maintaining 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. The plan includes, but may not be limited to:
  - Monitoring of groundwater to assess the performance and effectiveness of the
  - A schedule of monitoring and frequency of submittals to the Department; and
  - Monitoring for vapor intrusion for any new buildings developed on 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, optimization, monitoring, inspection, and reporting of any mechanical or physical components of the remedy. The plan includes, but is not limited to:
  - compliance monitoring of treatment systems to ensure proper O&M as well as providing the data for any necessary permit or permit equivalent reporting;
  - maintaining site access controls and Department notification; and
  - providing the Department access to the site and O&M records.

## **Declaration**

The remedy conforms to 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.

09-17-2015	Bastholm HPutjig for MJC
Date	Michael Cruden, Director
	Remedial Bureau E

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## **DECISION DOCUMENT**

Former Michelsen Furniture Co. Site Rochester, Monroe County Site No. C828189 September 2015

#### **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 has resulted in threats to public health and the environment that would be addressed by the remedy. The disposal or release of contaminants at this site, as more fully described in this document, has contaminated various environmental media. Contaminants include hazardous waste and/or petroleum.

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 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:

Monroe County Library System Attn: 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 site is 0.64 acres in area and consists of two parcels, located in an urban neighborhood in the City of Rochester. It is bounded by Avenue D to the south, Conkey Avenue to the east, residential property to the north, and the E1 Camino Trail and City of Rochester Avenue D Recreation Center to the east.

Site Features: Parcel 1, addressed 182 Avenue D, encompasses 0.41 acres with a four story brick warehouse building. Parcel 2 is a vacant lot addressed 374 Conkey Avenue. Parcel 2 encompasses 0.23 acres in size.

Current Zoning and Land Use: The property is zoned M-1 industrial. The City of Rochester Code allows for conversion of former industrial structures into multi-unit dwellings, a restricted residential land use.

Past Use of the Site: The site was utilized for furniture manufacturing between 1918 through 1954. Additional operators at the site in the 1950s included Columbia Carpet Co., Rice Tool and Die Co. and General Fabricators Co. Parcel 2 historically contained a railroad spur that serviced the Michelsen Building. The site has been utilized primarily for warehouse and distribution from the 1960's to present.

#### Geology and Hydrogeology:

Soils on site include silt with varying amounts of fine and coarse sand and gravel underlain by clay. Bedrock was encountered at 13 to 15 feet below ground surface. Groundwater is encountered at 10 to 12 feet below ground surface and is moving northward.

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 (or an alternative) that restrict(s) the use of the site to restricted-residential use (which allows for commercial use and industrial use) as described in Part 375-1.8(g) were/was evaluated in addition to an alternative which would allow for unrestricted use of the site.

A comparison of the results of the Remedial Investigation (RI) 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 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 contamination may be migrating off-site; 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

#### 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:

petroleum products trichloroethene (TCE) cis-1,2-dichloroethene tetrachloroethene (PCE)

The contaminant(s) of concern exceed the applicable SCGs for:

- groundwater
- soil

#### **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.

#### Tank and soil Removal (6/2015)

Two underground storage tanks located along the northern edge of the building were removed along with soils immediately surrounding the tanks. These 3000-gallon underground tanks were used for fuel oil storage. Approximately 500 gallons of product was pumped from the tanks and disposed of off-site. Contaminated soils that were encountered adjacent to the tanks were excavated and disposed of off-site at a permitted facility. Confirmatory soil samples from the excavation revealed that soil met the restricted-residential SCOs. The excavations were backfilled with clean soil from an approved off-site source. Post excavation groundwater monitoring results show petroleum-related contamination was reduced to non-detect in all but one location.

Sub-Slab Depressurization System (8/2015)

A sub-slab depressurization system was installed beneath the building slab during renovations to former manufacturing building. The system consists of four suction pits which penetrate below the concrete slab. PVC riser pipes extent from the suction pits to above the building roofline. There is a fan installed at the end of each riser pipe. Four permanent stainless steel vacuum monitoring points were installed below the basement slab. These points extend to monitoring ports along the outside edge of the building and allow for direct monitoring of sub-slab vacuum.

The system was placed into operation in August 2015 and will be monitored on a periodic basis.

#### Soil Removal (6/2015)

Approximately 1,900 tons of soil was excavated and disposed off-site at a permitted facility from Parcels 1 and 2 of the site. Due to the presence of PCE and TCE in these soils, a contained-in demonstration work plan was prepared to characterize these soils for off-site disposal.

Based on the concentrations detected in the soil samples the Department approved off-site disposal as non-hazardous waste.

After the IRM, soil that currently exceeds SCOs was limited to two areas. TCE concentrations within the source area exceed the protection of groundwater SCO of 0.47 ppm and PAHs exceed the restricted residential SCOs in one location at a depth of 4 to 10 feet below ground surface.

#### 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.

Soil and groundwater were analyzed for volatile organic compounds (VOCs) semi-volatile organic compounds (SVOCs), metals, polychlorinated biphenyls (PCBs) and pesticides.

Groundwater - Groundwater flow is northward and has been impacted by chlorinated solvents. A distinct source of TCE is located beneath and adjacent to the on-site building. Levels of TCE in groundwater range from ND to 4,200 ppb. TCE and cis-1,2-dichloroethene concentrations exceed NYS groundwater standards at the northern property line and is anticipated to extend offsite.

Soil - On-site soils are primarily impacted by low levels of TCE and PCE. TCE exceeds the protection of groundwater SCO within the primary source location at levels ranging from 0.47 ppm to 3.3 ppm. These soils are located adjacent to and beneath the southern portion of the building. Low levels of petroleum-related constituents were detected in soils below the restricted residential SCOs. Levels of PAHs exceed the restricted residential SCOs at one location at a depth of 4 to 10 feet below ground surface. All other analytes meet the restricted residential

SCOs. No off-site soil samples were taken during the RI and off-site soil contamination from this site is not anticipated.

Soil Vapor – No on-site soil vapor samples were collected during the RI. Based upon the groundwater and soil contamination adjacent to and beneath the building, soil vapor was assumed to be contaminated and addressed by an IRM. The site was determined to represent a significant threat and an off-site soil vapor intrusion investigation will be required.

#### 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*.

Direct contact with contaminants in the soil is unlikely because the majority of the site is covered with buildings and pavement. However, persons who dig below the ground surface may come into contact with contaminants in subsurface soil in areas not covered by the on-site building and pavement. People are not drinking the contaminated groundwater because the area is served by a public water supply that is not affected by this contamination. Volatile organic compounds in the groundwater may move into the soil vapor (air spaces within the soil), which in turn may move into overlying buildings and affect the 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 mitigate the potential for soil vapor intrusion. The potential for soil vapor intrusion in nearby residences needs to be investigated.

#### 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**

Remove the source of ground or surface water contamination.

#### 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

The alternatives developed for the site and the evaluation of the remedial criteria are presented in the Alternative Analysis. The remedy is selected pursuant to the remedy selection criteria set forth in DER-10, Technical Guidance for Site Investigation and Remediation and 6 NYCRR Part 375.

The selected remedy is a Track 4: Restricted use with site-specific soil cleanup objectives remedy.

The selected remedy is referred to as the In-Situ Chemical Oxidation remedy.

The elements of the selected remedy, as shown in Figure 2, are as follows:

Based on the results of the investigations at the site, the IRMs (underground storage tank removal, soil removal, and installation of a SSDS) that has been performed, and the evaluation presented here, the Department has selected in-situ groundwater treatment with a site cover as the remedy. This remedy includes in-situ injection of a chemical oxidant into groundwater via injection wells to destroy the VOC contaminants in groundwater. The remedy includes continued operation of the sub-slab depressurization system, continued monitoring of the groundwater injection system, and the implementation of ICs/ECs listed below.

- 1. **Remedial Design:** A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and 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;

- Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;
- Maximizing habitat value and creating habitat when possible;
- Fostering green and healthy communities and working landscapes which balance ecological, economic, and social goals; and
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.
- 2. **Site Cover:** A site cover will be required to allow for restricted residential use of the site. The cover will consist either of the structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper two feet of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where the soil cover is required, it will be a minimum of two feet of soil placed over a demarcation layer with the upper six inches of soil of sufficient quality to maintain a vegetative layer. Soil cover material, including fill materials brought to the site, will meet the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d).
- 3. **In-situ Chemical Oxidation:** In-situ chemical oxidation (ISCO) will be implemented to treat contaminants in groundwater and soil. A chemical oxidant will be injected into the subsurface to destroy the chlorinated volatile organic compounds in the soil and groundwater adjacent to the southern portion of the existing on-site building in an approximately 2,000 square feet area via injection wells screened across the bedrock/overburden interface. It is anticipated that the oxidant will result in the treatment of some limited areas or soil contamination beneath the building. Oxidant may also be injected into monitoring wells within the building. The methodologies and depth of injections will be determined during the remedial design. In the event this technology is unsuccessful another groundwater treatment technology such as enhanced bioremediation may be evaluated and implemented in the future.
- 4. <u>Institutional Control:</u> Imposition of an institutional control in the form of an environmental easement for the controlled property that:
- Requires 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);
- Allows the use and development of the controlled property for restricted residential, commercial and industrial uses as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- Restricts 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
- Requires compliance with the Department approved Site Management Plan.
- 5. Site Management Plan: A Site Management Plan is required, which includes the following:
- A. An Institutional and Engineering Control Plan (IC/EC 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:

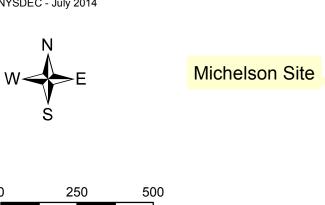
- Institutional Controls: The Environmental Easement, site use restrictions, and groundwater use restriction as presented in Item#2.
- Engineering Controls: Cover system as presented in Item #3, the SSDS installed during the IRM, and groundwater remediation system as presented in item #4.

The SMP plan includes, but may not be limited to:

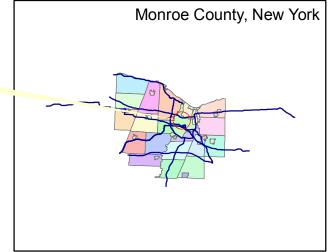
- An Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- Descriptions of the provisions of the environmental easement including any land use and groundwater use restrictions;
- A provision for evaluation of the potential for soil vapor intrusion for any new buildings developed on the site, 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;
- Maintaining 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. The plan includes, but may not be limited to:
  - Monitoring of groundwater to assess the performance and effectiveness of the
  - A schedule of monitoring and frequency of submittals to the Department; and
  - Monitoring for vapor intrusion for any new buildings developed on 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, optimization, monitoring, inspection, and reporting of any mechanical or physical components of the remedy. The plan includes, but is not limited to:
  - compliance monitoring of treatment systems to ensure proper O&M as well as providing the data for any necessary permit or permit equivalent reporting;
  - maintaining site access controls and Department notification; and
  - providing the Department access to the site and O&M records.

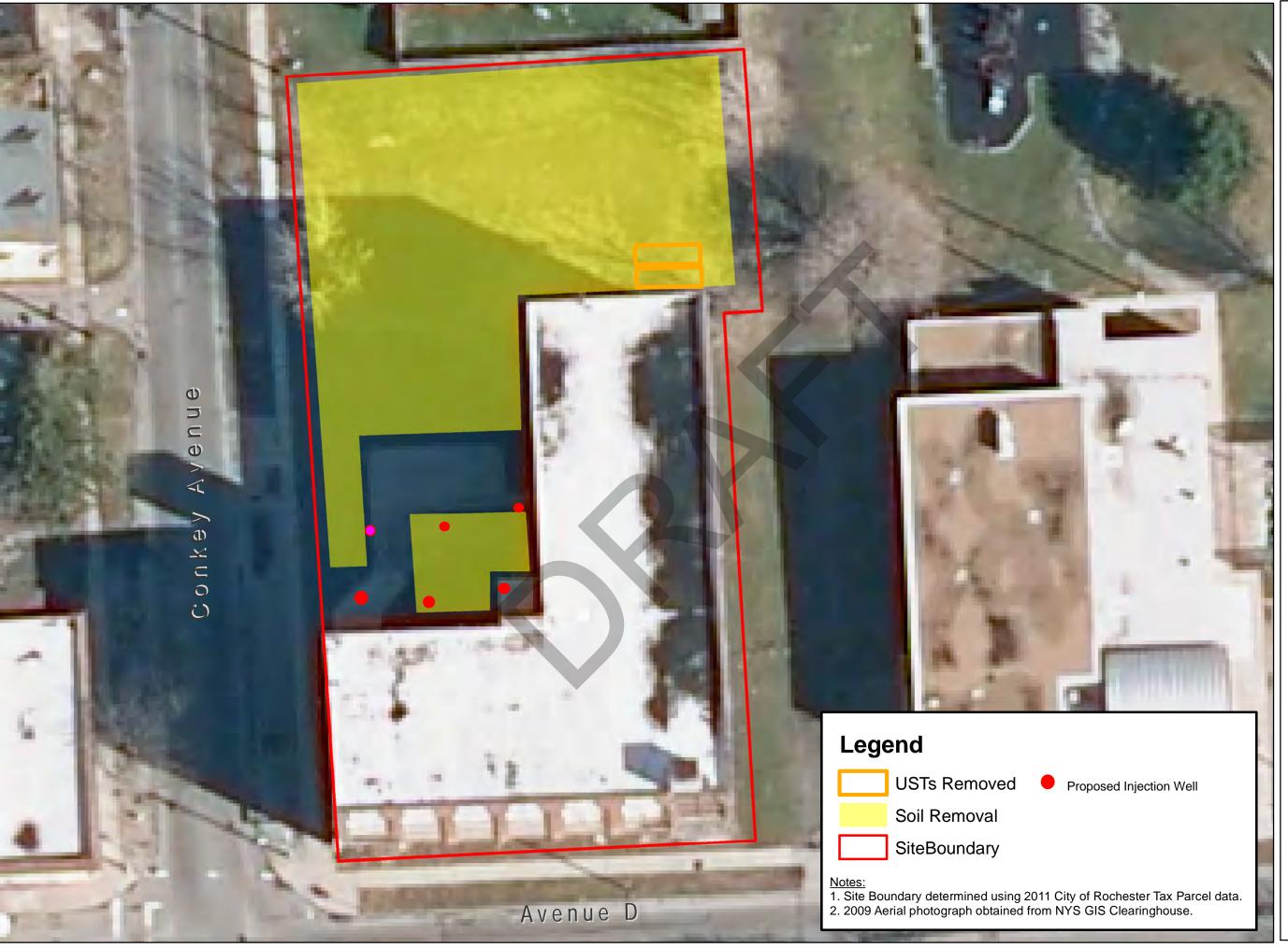
# Michelson Site Figure 1





Feet







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BCP Remedial Investigation

Former Michelsen Furniture Co. Site

182 Avenue D & 374 Conkey Avenue Rochester, New York

Urban League of Rochester Economic Develoment Corporation

Title:

Remedy Elements

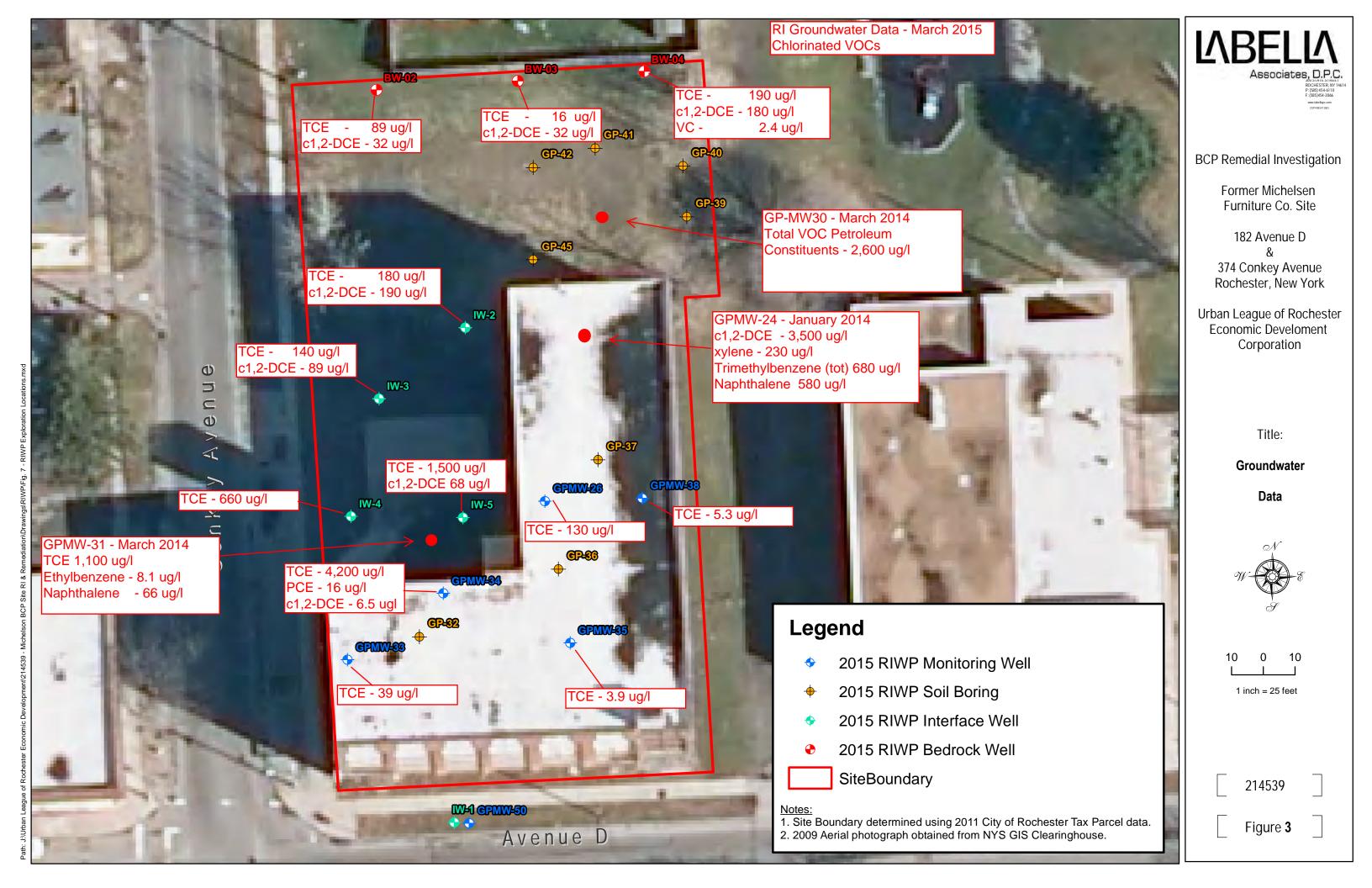


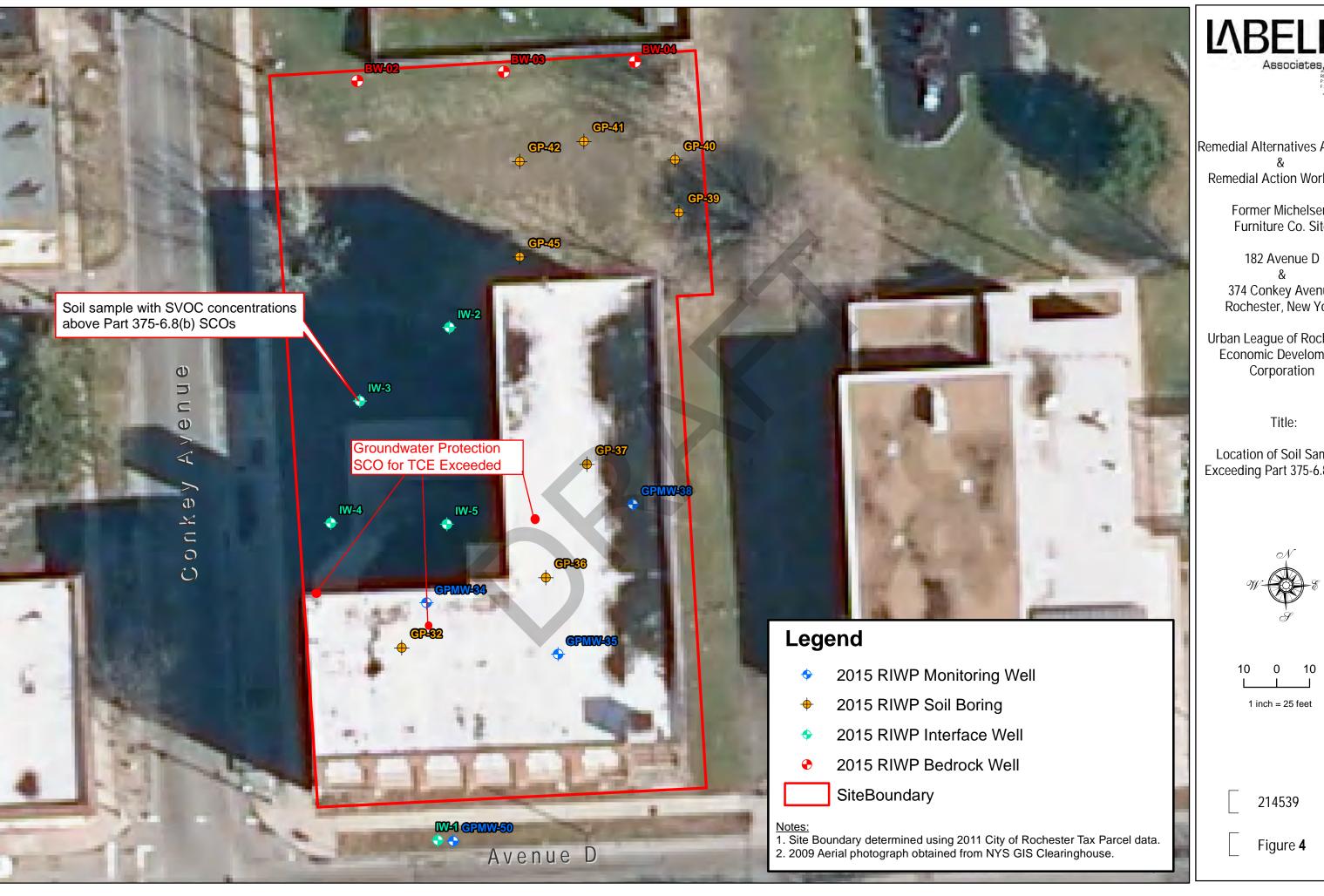
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1 inch = 25 feet

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Figure **2** 







Remedial Alternatives Analysis

Remedial Action Work Plan

Former Michelsen Furniture Co. Site

374 Conkey Avenue Rochester, New York

Urban League of Rochester Economic Develoment Corporation

Location of Soil Samples Exceeding Part 375-6.8 SCOs



1 inch = 25 feet

Figure **4**