Schneider, Timothy A (DEC)

From:	Schneider, Timothy A (DEC)
Sent:	Tuesday, July 26, 2022 11:22 AM
То:	Nate Simon
Cc:	Deming, Justin H (HEALTH); Kenney, Julia M (HEALTH); Pratt, David (DEC); rkampff@daymail.net; abodewes@parkgrovellc.com
Subject:	RE: Former Parkway Plaza Cleaners C835028, RAWP Addendum #1

Hi Nate,

Hope you are having a pleasant day so far.

RAWP Addendum #1 is accepted by the Department, please have a copy placed in the document repository.

Thank you,

Tim

Timothy A. Schneider P.E.

Pronouns: he / him / his Professional Engineer 1, Division of Environmental Remediation

New York State Department of Environmental Conservation

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From: Nate Simon <NSimon@daymail.net>
Sent: Tuesday, July 26, 2022 10:37 AM
To: Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>
Cc: Deming, Justin H (HEALTH) <justin.deming@health.ny.gov>; Kenney, Julia M (HEALTH)
<julia.kenney@health.ny.gov>; Pratt, David (DEC) <david.pratt@dec.ny.gov>; rkampff@daymail.net;
abodewes@parkgrovellc.com
Subject: Former Parkway Plaza Cleaners C835028, RAWP Addendum #1

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Hi Tim,

Attached is Addendum #1 to the May 2021 RAWP (RAWP approved by the NYSDEC on June 8, 2022). As stated in the attached Addendum #1, this not a change in remedy but a modification to the delivery process and remedial amendment quantity.

Please contact the office with questions.

REMEDIAL ACTION WORK PLAN ADDENDUM #1

FORMER PARKWAY CLEANERS EASTERN BOULEVARD PARKWAY PLAZA CITY OF CANANDAIGUA, ONTARIO COUNTY, NEW YORK BCP SITE NUMBER C835028

Prepared For: Parkway Plaza Limited Partnership 46 Prince Street Rochester, New York 14607
Prepared By: Day Engineering, P.C. 1563 Lyell Avenue Rochester, New York 14606
Project No.: 5188R-15
Date: July 2022

INTRODUCTION

Parkway Plaza Limited Partnership, LLP entered the New York State Brownfield Cleanup Program (BCP) to evaluate and remediate environmental impacts at the former Parkway Cleaners site in Canandaigua, New York (BCP Site #C835028 or the Site). As described in the Remedial Action Work Plan (RAWP) for the Site prepared by Day Engineering, P.C. dated May 2021, and conditionally approved by the New York State Department of Environmental Conservation (NYSDEC) June 8, 2022, the highest concentrations of contaminants of concern (COC), including tetrachloroethene and its breakdown products, in the soil and groundwater at the Site remain in proximity to the former source area below the concrete slab of the former alcove. In general, the COC concentrations measured in the groundwater downgradient of the source zone decreases prior to increasing in monitoring well MW-103s, which is located in proximity of the southeastern property boundary of the Site.

Based on the extent of COC-impact identified in the groundwater, soil and soil vapor, three areas of concern (AOC) are identified.

- AOC#1 Includes the former alcove area, potentially the area to the east where buried utilities precluded soil removal during a soil removal IRM completed in 2001, an area extending to a maximum depth of 18 ft. bgs;
- AOC#2 Includes a localized area south of AOC#1 where COC concentrations in excess of the Protection of Groundwater were detected in two test borings at depths of predominately between about 16 and 32 ft. bgs; and
- AOC#3 Includes the on-site area in proximity of MW-103s that extends to a depth of about 13 ft. bgs.

The Recommended Remedial Alternative (i.e., Track 4 Restricted Commercial Use) to be implemented at the Site includes:

- A cover system consisting of asphalt pavement, building slabs and sidewalks will be maintained to allow for restricted commercial use of the Site;
- The AOC#1 source will be addressed by in-situ treatment/chemical reduction of groundwater (containment) by in-situ chemical reduction via injection of zero-valent iron within a targeted injection zone of 4 ft. and 18 ft. bgs to treat COC in groundwater;
- Groundwater plume migration (AOC#1/AOC#3) will be addressed by in-situ treatment/biodegradation of groundwater (containment) by in-situ enhanced biodegradation to treat COC in groundwater through anaerobic reductive dechlorination via the injection of emulsified vegetable oil (EVO) between 4 ft. and 18 ft. bgs;
- The continued operation of the SSDS within the former Parkway Cleaners tenant space and testing as deemed necessary in adjacent tenant spaces to mitigate potential soil vapors from entering the existing build and the installation of a SSDS in new buildings, if warranted;
- Implementation of engineering controls (e.g., maintenance of the cover system, continued operation of the SSDS, etc.);
- Imposition of an institutional control in the form of environmental easement or deed restriction for the Site; and

• Development and implementation of a Site Management Plan (SMP).

MODIFICATION OF AOC#1 REMEDIATION

Subsequent to the NYSDEC approval of May 2021 RAWP (i.e., received on June 8, 2022), the recommended remedial amendment presented in the May 2021 RAWP became unavailable. However, as described below suitable replacement amendments are available. This RAWP Addendum #1 identifies the change in remedial amendment, however, this is not a change in remedy.

Due to manufacturing issues, EOS eZVI (i.e., the amendment identified in the May 2021 RAWP) is no longer available. Alternatively, EOS Pro (emulsified vegetable oil substrate) and micro-scale zero-valent iron (ZVI) powder will be blended in the field as part of the injection process in lieu of the eZVI proposed in the RAWP. EOS Pro and ZVI are the amendments that comprised the EOS eZVI product, but mixing in the field is required since they will be supplied as two separate products. This change is not anticipated to reduce the effectiveness of this remedial approach. The change to EOS Pro and micro scale ZVI results in AOC#1 receiving approximately 2,200 lbs of micro scale ZVI (equivalent mass to the NYSDEC approved RAWP dated May 2021 recommended ZVI dosing) and approximately 3,360 lbs of emulsified vegetable oil. Thus, the revised mass per injection point for AOC#1, assuming 12 injection points, is 183 lbs of ZVI and 280 lbs of EVO. The recommended amendment (i.e., EOS Pro) and volumes presented in the May 6, 2021 RAWP remain unchanged for AOC#3. As such, the proposed modification presented herein is not a change in remedy but a modification to the delivery process and an increase in EVO for AOC #1, primarily due to the revised dosing calculations and rounding up of a fraction of drum to the nearest whole drum.

With the exception of the amendments proposed for AOC #1, the other amendments and methods identified NYSDEC approved RAWP dated May 2021 will be implemented without modification.