City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of
Environmental Services

Office of the Commissioner
City Hall, Room 300-B
30 Church Street
Rochester, New York 14614-1290

January 18, 1994

New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414
Attention: Mr. Todd Caffoe

Re: Addenda to Tunnel Project Work Plan for Contaminated Soils

Dear Mr. Caffoe:

The following are addenda to the Work Plan for Contaminated Soils prepared by MARCOR of New York, Inc. for the tunnel excavation project:

1. **Section 4.0 Excavation and Segregation of Soils**

   The following sentence is added:

   On-site monitoring for soil contamination is to begin once the project excavation reaches a depth of 7 feet.

2. **Section 4.6 Over Excavation**

   This section is deleted and replaced with the following:

   All contaminated soil encountered will be excavated to the limits of the tunnel contract with LeChase General Contractors, regardless of whether excavation was originally planned for these soils. Excavation will be to the extent made practical by the excavating equipment and the shoring.

3. **Section 5.2 Disposal Facility/Soil Sampling**

   This section is deleted and replaced with the following:

   The excavated soil will be characterized to satisfy the requirements of an appropriate permitted disposal facility. Previous analysis of soils at the site will be used in obtaining the waste approval from the facility, along with additional analysis as requested by the disposal facility.

4. **Section 5.3 NYS DEC Soil Sampling**

The first paragraph of this section is deleted and replaced as follows:

The City of Rochester has recently done soil borings in the area of the tunnel excavation. These borings were analyzed for volatile organic compounds by EPA method 8240. Based on the results of this analysis, the City feels comfortable in its characterization of the soil as non-hazardous petroleum contaminated soil. If, however, the NYSDEC requests it, testing of contaminated soils generated as a result of the tunnel excavation will be completed in accordance with NYSDEC STARS Memo #1. The number of samples required by that guidance document are as follows.

5. **Section 6.0 Dewatering**

The second sentence in this section is amended to read as follows:

The water will be pumped into DOT Spec 17E drums for off-site disposal at an appropriate facility.

6. **Section 8.4 Off-Site Disposal**

This section is amended as follows:

MARCOR will provide for off-site disposal of contaminated water. The manifest forms and records must be consistent with appropriate NYSDEC, USEPA and USDOT requirements. The City of Rochester will provide for the off-site transportation and disposal of all excavated contaminated soil generated at the site. A City of Rochester representative will be available to ratify all waste disposal arrangements and to sign any paperwork.

Please feel to contact me at 428-7474 should you have any questions, comments or require further information.

Sincerely,

Anne Spaulding Klumpp
Environmental Compliance Coordinator

c: Mark Gregor, DES/Environmental Quality
Nancy Burton, DES/Municipal Facilities
Kris Kohrt, MARCOR of NY, Inc.

(5/76)
Formerly GA-4

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

TRANSMITTAL SLIP

Todd file

TO Mary Jane Peachey Reg 8 - DEC

FROM Yavuz Erk Reg 9 DATE 2/3/94

RE: City of Rochester - Bausch and Lomb Building excavation: Additional information that I have received from the City.

RECEIVED
FEB - 9 1994
NYS DEPT. OF ENVIRONMENTAL CONSERVATION-REGION 8
(SUBSTS./REM.)

FOR ACTION AS INDICATED:

- ☐ Please Handle
- ☐ Prepare Reply
- ☐ Prepare Reply for Signature _____
- ☒ Information
- ☐ Approval
- ☐ Prepare final/draft in _____ Copies
- ☐ Comments
- ☐ Signature
- ☐ File
- ☐ Return to me
- ☐ _____
- ☐ _____

MLM
YE

City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of
Environmental Services

Office of the Commissioner
City Hall, Room 300-B
30 Church Street
Rochester, New York 14614-1290

January 31, 1994

New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, New York 14203-2999
Attention: Mr. Yavuz Erk

Re: Stoddard Contaminated Soil Disposal

Dear Mr. Erk:

As per your request, the following is additional information regarding the City of Rochester's request for Stoddard contaminated soil approval through BFI.

I have added some clarifying information on the site drawing enclosed. The large darkened areas on the drawing are Stoddard contaminated soils which have been excavated as part of construction activities on site to date. The remaining contaminated soil will be excavated upon demolition of an existing building (Speedy Cleaners).

I am also enclosing a map with the soil boring locations and analytical results. These soils represent the soil contaminated with Stoddard which will be excavated upon demolition of Speedy Cleaners. Samples from the soil were taken at varying depths, from 4 feet to 23 feet. Soil for analysis were taken from the borings based on HNu screenings. Samples were analyzed using NYS ASP protocol for volatile organic compounds (EPA method 8240). Two samples (B-3 and B-6) were extracted via TCLP prior to 8240 analysis. Library searches were run to tentatively identify compounds not listed in the 8240 list.

The results of these analyses show the soil to be contaminated with petroleum compounds consistent with Stoddard Solvent. One area, however (B-3), was shown to contain tetrachloroethylene. This area will be excavated separately and managed as a hazardous waste.

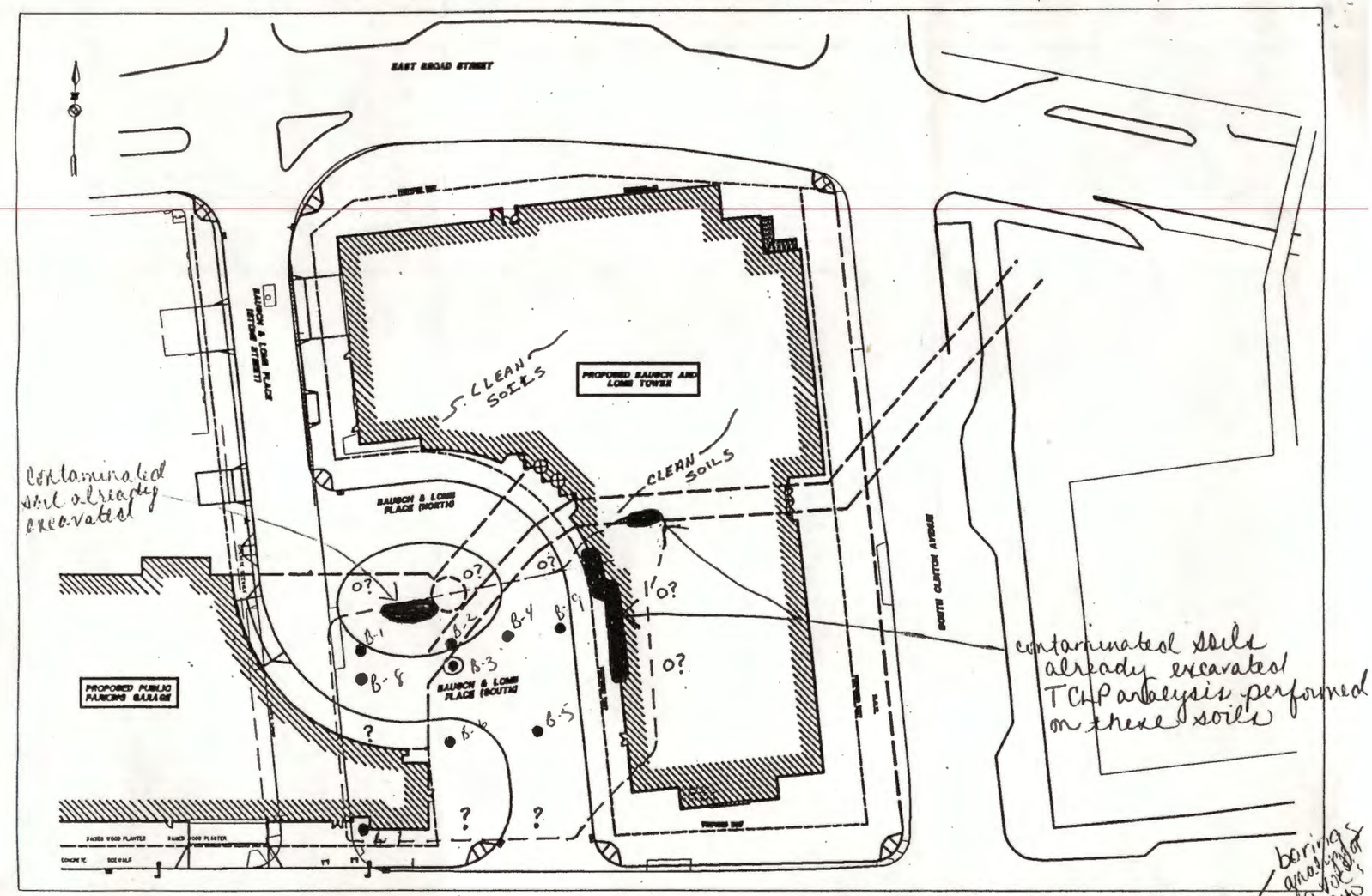
Please feel free to call me at 428-7474 if you have any questions or require further information.

Sincerely,

Anne Spaulding Klumpp
Environmental Compliance Coordinator

Enclosures

Location Drawing
Soil Contamination Findings to date ~~1/5/94~~ 1/31/94



NOTES

1. This drawing was reproduced by Seeler Associates from a site plan drawing created by the City of Rochester's Department of Environmental Services/Engineering Services. The original drawing obtained from the City of Rochester was not dated.
2. All boring and monitoring well locations designated on the drawing are approximate.
3. Boring locations designated as B1 through B9, and sampling location VAULT, were completed and sampled by Seeler Associates, December 1993.
4. The following boring locations were completed and sampled by Monroe Monitoring and Analysis, September 1993; BS-2B, BS-3, BS-4, BR-1, BSMT #1, DC-1, and DC-2.
5. The following groundwater monitoring were completed and sampled by LaBella Associates, April 1992, GW-1, GW-2, GW-3, and GW-5.
6. Boring location B507 was completed for the geotechnical investigation of the Parking Garage Project by Enpire Soils.
7. All depths shown are approximates and represent the depth of the sample below groundsurface or interior floor slab.
8. The analytical data labeled with "J", are estimated values.
9. Boring elevations were surveyed by Larsen Engineers on January 4, 1994. Elevations are based on U.S.C.&G.S. monument "Court" elevation 525.32, Rochester City Datum.

* Methylene chloride and acetone were detected in lab method blanks.

Boring Identification	Elevation
B1	531.56
B2	532.44
B3	532.48
B4	532.59
B5	533.51
B6	522.36
B7	522.18
B8	532.52
B9	533.32

BORING B1
DEPTH 7 FT TO 9 FT

Unknown Alkane	273,000 ppb J
Unknown Hydrocarbon	32,000 ppb J
1,2,4-Trimethylbenzene	22,000 ppb J
Unknown Aromatic Hydrocarbon	35,000 ppb J
Naphthalene, decahydro-, trans-	27,000 ppb J

BORING B1
DEPTH 21 FT TO 23 FT

Unknown	20 ppb J

BORING VAULT
DEPTH 0 IN TO 1 IN

Methylene-Chloride	8,000 ppb J
Acetone	27,000 ppb J
Unknown	63,000 ppb J
Unknown Alkane	163,300 ppb J

BORING B3
DEPTH 2 FT TO 4 FT - 11 IN

Unknown	148,000 ppb J
Unknown Alkane	477,000 ppb J
Unknown Aromatic Hydrocarbon	51,000 ppb J
Tetrachloroethylene	90

B507

BORING B3
DEPTH 11 FT TO 13 FT

No analytes detected above detection limits.

BORING B7
DEPTH 3 FT TO 4 FT

(m&p) Xylene	16,000 ppb
o-Xylene	12,000 ppb
cis-1,2-Dichloroethene	370 ppb J
Toluene	700 ppb J
Ethylbenzene	3,600 ppb
Unknown	29,000 ppb J
Unknown Alkane	274,000 ppb J
Unknown Aromatic Hydrocarbon	99,000 ppb J
Benzene, 1-ethyl-2-methyl-	231,000 ppb J
1,2,4-Trimethylbenzene	311,000 ppb J
Benzene, 1-methyl3-propyl-	65,000 ppb J

GW-5

STONE STREET

BORING B2
DEPTH 0 FT TO 14 FT

(m&p) Xylene	2,900 ppb J
o-Xylene	2,500 ppb J
Unknown Alkane	1,452,000 ppb J
Unknown Aromatic Hydrocarbon	192,000 ppb J
1,2,4-Trimethylbenzene	190,000 ppb J
Benzene, 1-methyl-3-propyl-	870,000 ppb J

BORING B2
DEPTH 24 FT TO 25 FT

(m&p) Xylene	20 ppb J
o-Xylene	17 ppb J
Unknown Alkane	3,135 ppb J
Unknown Hydrocarbon	190 ppb J
1,2,4-Trimethylbenzene	280 ppb J
Benzene, 1-ethyl-4-methyl-	71 ppb J
Benzene, 1-methyl-3-propyl-	97 ppb J
Benzene, 1-methyl-3-(1-methylethyl)-	64 ppb J

B-1 B-2 B-3

DC-2 DC-1 BR-1

SPEEDY'S DRY CLEANERS

BS-3 BS-2B BSMT #1 BS-1 BS-4

GW-2

BORING B4
DEPTH 11 FT TO 13 FT

Unknown Alkane	580,000 ppb J
Unknown Aromatic Hydrocarbon	65,000 ppb J
1,2,4-Trimethylbenzene	59,000 ppb J

BORING B4
DEPTH 21 FT TO 23 FT

Acetone	5 ppb J
Unknown	28 ppb J
Unknown Alkane	246 ppb J
Unknown Aromatic Hydrocarbon	37 ppb J

BORING B9
DEPTH 10 FT TO 12 FT

Unknown	43,000 ppb J
Unknown Alkane	1,080,000 ppb J
Unknown Aromatic Hydrocarbon	102,000 ppb J
Unknown Hydrocarbon	49,000 ppb J
1,2,4-Trimethylbenzene	100,000 ppb J
Naphthalene, decahydro-, trans-	66,000 ppb J

BORING B9
DEPTH 20 FT TO 21 FT

cis-1,2-Dichloroethene	4 ppb J
Unknown	30 ppb J
Unknown Aromatic Hydrocarbon	28 ppb J
Unknown Alkane	11 ppb J
Benzene, 1-ethyl-2-methyl-	20 ppb J
Benzene, 1,2,4-trimethyl-	68 ppb J
Benzene, 1-methyl-2-(1-methylethyl)-	6.0 ppb J
1,2,4-Trimethylbenzene	17 ppb J

BORING B5
DEPTH 10 FT TO 12 FT

Unknown	57 ppb J
Unknown Alkane	198 ppb J

BORING B5
DEPTH 16 FT TO 17 FT

Unknown	50 ppb J
Unknown Alkane	12 ppb J

BORING B6
DEPTH 4.5 IN TO 12 IN

(m&p) Xylene	260,000 ppb
o-Xylene	190,000 ppb J
Ethylbenzene	57,000 ppb J
Unknown Alkane	15,720,000 ppb J
Unknown Aromatic Hydrocarbon	3,540,000 ppb J
Benzene, 1-ethyl-2-methyl-	4,300,000 ppb J
1,2,4-Trimethylbenzene	1,300,000 ppb J
Benzene, 1-methyl-3-propyl-	760,000 ppb J

GW-3

COURT STREET

LEGEND

B1 Boring Location and

Waste Systems™

BROWNING-FERRIS INDUSTRIES
NIAGARA RECYCLING, INC.

Recycled paper

January 21, 1994

Mr. Yavuz Erk
New York State Dept. of
Environmental Conservation
270 Michigan Avenue
Buffalo, New York 14203-2999

Re: City of Rochester
Soil Contaminated with Petroleum Distillates
Disposal Application No.2390

Dear Mr. Erk,

The City of Rochester is constructing a new parking garage and has encountered a significant amount soil contaminated with stoddard solvent (petroleum Distillates) in the area which resulted from some previous dry cleaning operations which occurred over the last 1/2 century.

A completed 47-19-7 disposal application, analytical data and additional information is enclosed.

Please review this application at your earliest convenience.

Very Truly,

David L. Hanson
Environmental Mgr.

cc: Bob Anthony

56TH STREET & NIAGARA FALLS BOULEVARD
MAILING ADDRESS: PO BOX 344 LPO • NIAGARA FALLS, NEW YORK 14304-0344
TELEPHONE: (716) 285-3344 / FACSIMILE: (716) 285-3398

47-19-7 (10/86)—Text 12

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE • BUREAU OF HAZARDOUS WASTE OPERATIONS
50 WOLF ROAD, ALBANY, NEW YORK 12233-4017

APPLICATION FOR TREATMENT OR DISPOSAL OF AN INDUSTRIAL WASTE STREAM

SEE APPLICATION INSTRUCTIONS ON REVERSE SIDE

FOR STATE USE ONLY		
SITE NO. 32S11	APPLICATION NO. 2390	DATE RECEIVED 1/24/94
DEPARTMENT ACTION ☐ Approved ☐ Disapproved		DATE

1. NAME OF PROJECT/FACILITY	2. COUNTY	3. SITE NUMBER
NIAGARA RECYCLING, INC.	Niagara	32S11
4. NAME OF OWNER	**5. ADDRESS (Street, City, State, Zip Code)**	**6. TELEPHONE NO.**
NIAGARA RECYCLING, INC.	56th St. and Niagara Falls Blvd. P.O. Box 344 LPO, Niagara Falls, NY 14304-0344	716-285-3344
7. NAME OF OPERATOR	**8. ADDRESS (Street, City, State, Zip Code)**	**9. TELEPHONE NO.**
NIAGARA RECYCLING, INC.	same as 5. above	716-285-3344

10. METHOD OF TREATMENT OR DISPOSAL

SANITARY LANDFILL
DISPOSAL CODE D90

11. COMPANY GENERATING WASTE	12. ADDRESS OF FACILITY GENERATING WASTE (Street, City, State, Zip Code)	
City of Rochester	Court St & Stone St.	
13. REPRESENTATIVE OF WASTE GENERATOR	**14. MAILING ADDRESS OF REPRESENTATIVE**	**15. TELEPHONE NO.**
Ann Spaulding Klumpp	30 Church St., Room 300B Rochester, NY 14614	(716) 428-7474

16. DESCRIPTION OF PROCESS PRODUCING WASTE spills of stoddard solvent

17. EXPECTED ANNUAL WASTE PRODUCTION	18. WASTE HAULED IN
up to 20,000 Tons/Year one time Gallons/Year	☐ Drums ☐ Bulk Tank ☐ Roll-off Container ☒ Other dump trailer

19. WASTE COMPOSITION	19b Physical State	19c pH Range
19a. Average Percent Solids 100	☐ Liquid ☐ Slurry ☐ Sludge ☒ Solid ☐ Contained Gas	6 to 9

19d. COMPONENTS	CONCENTRATION (Dry Weight) Upper	Lower	Typical	UNIT (Check one) Wt.%	PPM
1) soil	98	100	99	☒	☐
2) stoddard solvent	0	2	1	☒	☐
3) gasoline	0	2	1	☒	☐
4)				☐	☐

20. IS AN ANALYSIS OF WASTE ATTACHED?	21. WAS A TCLP TEST CONDUCTED ON THE WASTE?	22. MATERIAL IS:
☒ Yes ☐ No	☒ Yes ☐ No If "Yes", attach results	☐ Hazardous ☒ Non-Hazardous

23. DETAIL ALL HAZARD AND NUISANCE PROBLEMS ASSOCIATED WITH THE WASTES. List necessary safety, handling, treatment and disposal precautions.

Additional Transporters:
Haseley Trucking Co., Inc. 10315 Lockport Rd., Niagara Falls, NY 14304 - 9A-483 (716) 297-1550
Buffalo Fuel Corp., 2470 Allen Ave., Niagara Falls, NY 14303 9A-098 - 716-773-1921
Silvarole Trucking Co. Inc. 1151 Brighton Henrietta TL Rd, Rochester, NY 14623 8A-190 716-272-0741

24. WHERE WAS MATERIAL DISPOSED OF PREVIOUSLY? N/A

25. NAME OF WASTE TRANSPORTER	26. ADDRESS (Street, City, State, Zip Code)	27. NYSDEC PERMIT No.	28. TELEPHONE NO.
BFI of New York, Inc.	2321 Kenmore Ave. PO Box 9	9A-045	716-693-5185

29. CERTIFICATION

I hereby affirm under penalty of perjury that information provided on this form and attached statements and exhibits is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

a. SIGNATURE AND TITLE OF REPRESENTATIVE OF WASTE GENERATOR	DATE
X Ann Spaulding Klumpp Environmental Compliance Coordinator	1/10/94
b. SIGNATURE AND TITLE OF REPRESENTATIVE OF TREATMENT OR DISPOSAL FACILITY	**DATE**
X [signature] Environmental Manager	01/21/94

City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of
Environmental Services

Office of the Commissioner
City Hall, Room 300-B
30 Church Street
Rochester, New York 14614-1290

January 21, 1994

BFI Waste Systems, Inc.
2321 Kenmore Avenue
P.O. Box 9
Kenmore, New York 14217
Attention: Mr. Robert Anthony

Re: Stoddard Contaminated Soil
WCD No. AB15248

Dear Mr. Anthony:

In response to your request for additional information for the above referenced waste stream, the City of Rochester submits the following:

1. The soil originally flashed at 133F. The second flash point, >140F, was determined after the soil pile had aired for several days. A composite sample was then taken from several random points on the pile and re-tested for flash point.

2. TCLP sampling for the pile was done by taking one composite sample fonn six points on the soil pile. The sample points were determined by using a grid system.

3. Additional soils will be generated at the same site from the same contaminant source (Stoddard Solvent). Nine soil borings done at the site show VOC screenings (HNu readings) to be similar to readings taken at the already excavated soil. It is evident that the spilled Stoddard has impacted much of the soil at the site.

The City of Rochester would appreciate a quick turn-around time on this waste approval. If you have any questions of require further information please do not hesitate to call me at (716) 428-7474.

Sincerely,

Anne Spaulding Klumpp
Environmental Compliance Coordinator

EEO Employer/Handicapped

City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of Environmental Services

Office of the Commissioner
City Hall, Room 300-B
30 Church Street
Rochester, New York 14614-1290

January 13, 1994

Post-it™ brand fax transmittal memo 7671 | # of pages ▸

To Bob Anthony	From Anne Klumpp
Co. BFI	Co. City of Roch.
Dept.	Phone # 428.7474
Fax # 873-7531	Fax # 428-6010

BFI Waste Systems, Inc.
2321 Kenmore Avenue
P.O. Box 9
Kenmore, New York 14217
Attention: Mr. Robert Anthony

Re: Stoddard Contaminated Soil

Dear Mr. Anthony:

On Monday, January 10, 1994 I provided analysis and completed a WCD for Stoddard Solvent contaminated soil being generated at the Court Street and Stone Street Construction site in Rochester, New York.

The soil has been contaminated with Stoddard Solvent as a result of releases from a dry cleaning operation that has operated on site for at least 70 years. The total volume of contaminated soil is unknown, but may be as much as 20,000 tons. The soil is to be removed as part of the construction of a parking garage at the site.

On December 16, 1993 a composite sample was obtained from the approximately 75 yards of contaminated soil excavated at the site to date. The composite consisted of samples taken from six (6) points on the soil pile. The sample points were chosen based on a grid system. The composite sample was analyzed for flash point, reactivity, corrosivity, percent solids, paint filter, PCB, TOX, and full TCLP. These results indicate that the waste is non-hazardous special waste.

Please note that there is one area located underneath the dry cleaning building that we have identified as a hazardous waste due to the presence of tetrachloroethylene. This waste will be excavated out and the sides and bottom of the excavation tested to confirm all of the tetrachloroethylene contaminated soil has been removed. No tetrachloroethylene has been detected in any other soils in the area to be excavated.

The City of Rochester is interested in obtaining approval of this non-hazardous Stoddard Solvent contaminated soil through BFI. If you have any questions or require further information please do not hesitate to contact me at (716) 428-7474.

Sincerely,

Anne Spaulding Klumpp
Environmental Compliance Coordinator

two methyl groups and an aliphatic side-chain attached to the nucleus. The length of the side-chain varies and generally contains 8, 9 or 10 carbon atoms in the sterols, 5 carbon atoms in the bile acids, 2 in the adrenal cortical steroids, and none in the estrogens and androgens. Steroids are classed as lipids because of their solubility in organic solvents and insolubility in water.

Most of the naturally occurring steroids have been synthesized and many new steroids unknown in nature have been synthesized for use in medicine, such as the fluorosteroids (dexamethasone).

sterol. A steroid alcohol. Such alcohols contain the common steroid nucleus, plus an 8 to 10-carbon side-chain and a hydroxyl group. Sterols are widely distributed in plants and animals, both in the free form and esterified to fatty acids. Cholesterol (...) is the most important animal sterol; ergosterol is an important plant sterol (phytosterol).

"Sterosan."[219] Trademark for a brand of chlorquinaldol (q.v.).

"Sterox."[58] Trademark for a series of nonionic surface-active agents including polyoxyethylene ethers, and polyoxyethylene thioethers.

STH. See somatotropic hormone.

stibic anhydride. See antimony pentoxide.

stibine. See antimony hydride.

stibium. The Latin name for the element antimony; hence the symbol Sb.

stibnite (gray antimony; antimony glance; antimonite) Sb_2S_3.
Properties: Lead gray mineral; subject to black tarnish; metallic luster. Soluble in concentrated boiling hydrochloric acid with evolution of H_2S. Sp. gr. 4.52–4.62; Mohs hardness 2.
Occurrence: Japan; China; Mexico; Bolivia, Peru; South Africa.
Use: The most important ore of antimony.

stibophen $C_{12}H_4Na_3O_{15}S_4Sb \cdot 7H_2O$. Sodium antimony II bis(catechol-2,4-disulfonate) heptahydrate.
Properties: White, crystalline, odorless powder. Affected by light. Freely soluble in water; nearly insoluble in alcohol, ether, and chloroform.
Derivation: Reaction of sodium pyrocatechol-3,5-disulfonate with antimony trioxide and precipitating with alcohol.
Grade: U.S.P.
Use: Medicine.

stigmasterol $C_{29}H_{48}O \cdot H_2O$. A plant sterol.
Properties: Anhydrous form has m.p. of 170°C. Insoluble in water; soluble in usual organic solvents. Combustible.
Derivation: From soy or calabar beans.
Uses: Preparation of progesterone and other important steroids.

stilbene (tolylene; trans form of alpha, beta-diphenylethylene) $C_6H_5CH{:}CHC_6H_5$.
Properties: Colorless or slightly yellow crystals; sp. gr. 0.970; m.p. 124–125°C; b.p. 306–307°C. Soluble in benzene and ether; slightly soluble in alcohol; insoluble in water. Combustible.
Derivation: By passing toluene over hot lead oxide.
Method of purification: Crystallization; zone melting used for very pure crystals.
Grades: Technical; pure.
Uses: Manufacture of dyes and optical bleaches; crystals are used as phosphors and scintillators.
Note: The cis form of alpha, beta-diphenylethylene (isostilbene), is a yellow oil; b.p. 145°C (13 mm); m.p. 1°C.

stilbene dye. A dye whose molecules contain both the —N=N— and the >C=C< chromophore groups in their structure and whose CI numbers range from 40000 to 40999. These are direct cotton dyes.

stilbestrol. See diethylstilbestrol.

stillage. The grain residues from alcohol production, used in feeds and feed supplements.

Stock system. See chemical nomenclature.

Stoddard solvent. A widely used dry-cleaning solvent. U.S. Bureau of Standards and ASTM D—484—52 define it as a petroleum distillate clear and free from suspended matter and undissolved water, and free from rancid and objectionable odor. The minimum flash point is 100°F. Distillation range: not less than 50% over at 350°F (177°C), 90% over at 375°F (190°C), and the end point not higher than 410°F (210°C). Autoignition temp. 450°F. Combustible.
Containers: 55-gal steel drums; tank cars; tank trucks.
Hazard: Moderate fire risk. Moderately toxic by ingestion. Tolerance, 200 ppm in air.

"Stod-Sol."[200] Trademark for a petroleum solvent prepared by straight-run distillation.
Properties: Water-white; initial boiling point 308–316°F, 95% distills between 363–373°F; sp. gr. 0.780 (60°F); flash point (TCC) 103°F; mild, nonresidual odor. Combustible.
Hazard: Moderate fire risk.
Use: Dry cleaning.

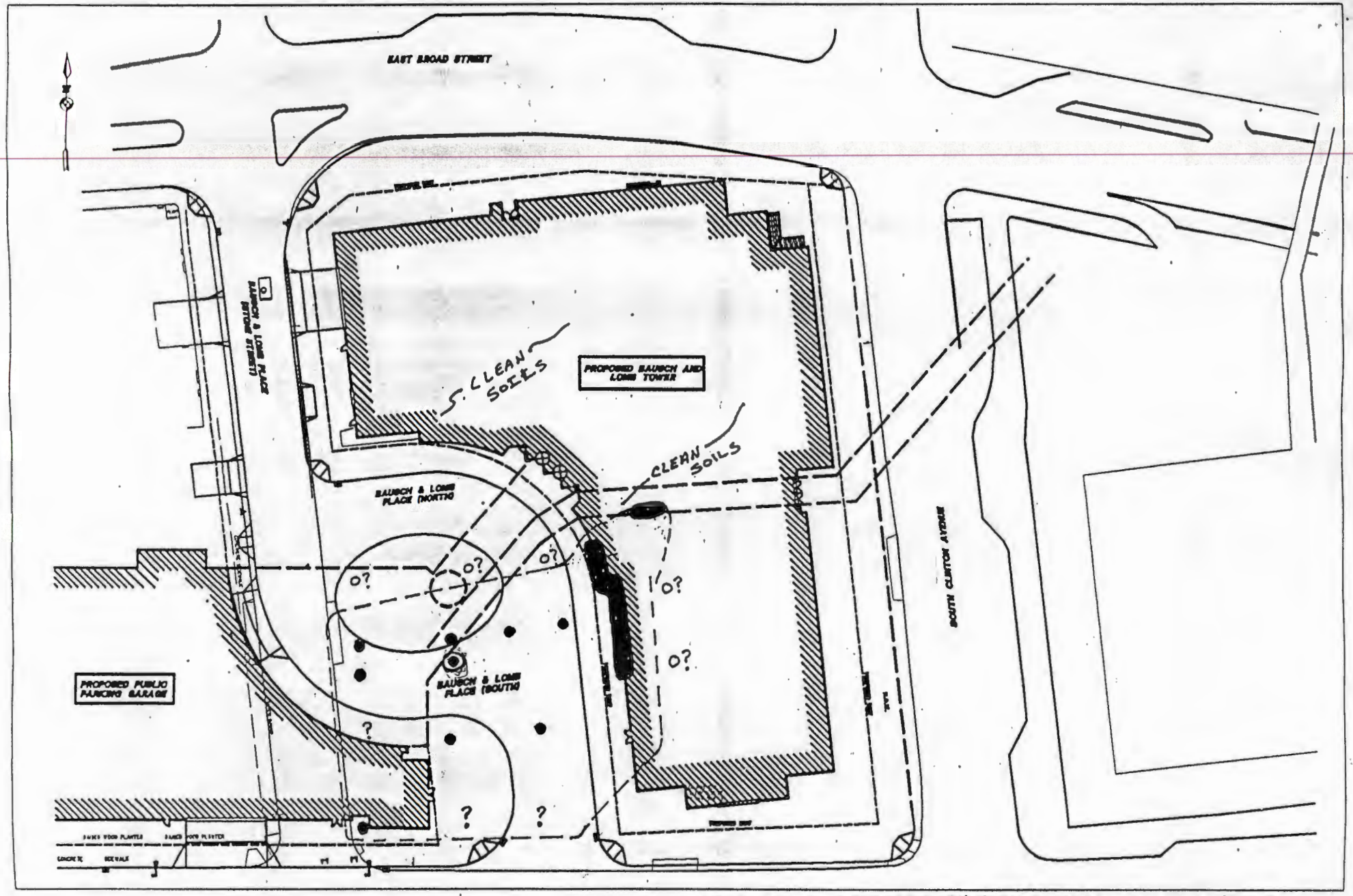
stoichiometry. The branch of chemistry and chemical engineering that deals with the quantities of substances that enter into and are produced by chemical reactions. For example, when methane unites with oxygen in complete combustion, 16 grams of methane require 64 grams of oxygen. At the same time 44 grams of carbon dioxide and 36 grams of water are formed as reaction products. Every chemical reaction has its characteristic proportions. The methods of obtaining these from chemical formulas, equations, atomic weights and molecular weights, and determination of *what* and *how* much is used and produced in chemical processes is the major concern of stoichiometry.

Stokes' law. (1) The rate at which a spherical particle will rise or fall when suspended in a liquid medium varies as the square of its radius; the density of the particle and the density and viscosity of the liquid are essential factors. Stokes' law is used in determining sedimentation of solids, creaming rate of fat particles in milk, etc. The equation is:

$$v = \frac{h}{t} = \frac{gD^2(\rho_s - \rho_1)}{18\eta}$$

where v is the terminal velocity, h the height of fall, t the time, g the gravitational constant, D, the particle diameter, ρ_s, ρ are the densities of the solid and the suspending medium, respectively, and η is the viscosity.

LOCATION DRAWING
SOIL CONTAMINATION FINDINGS TO DATE 1/5/94



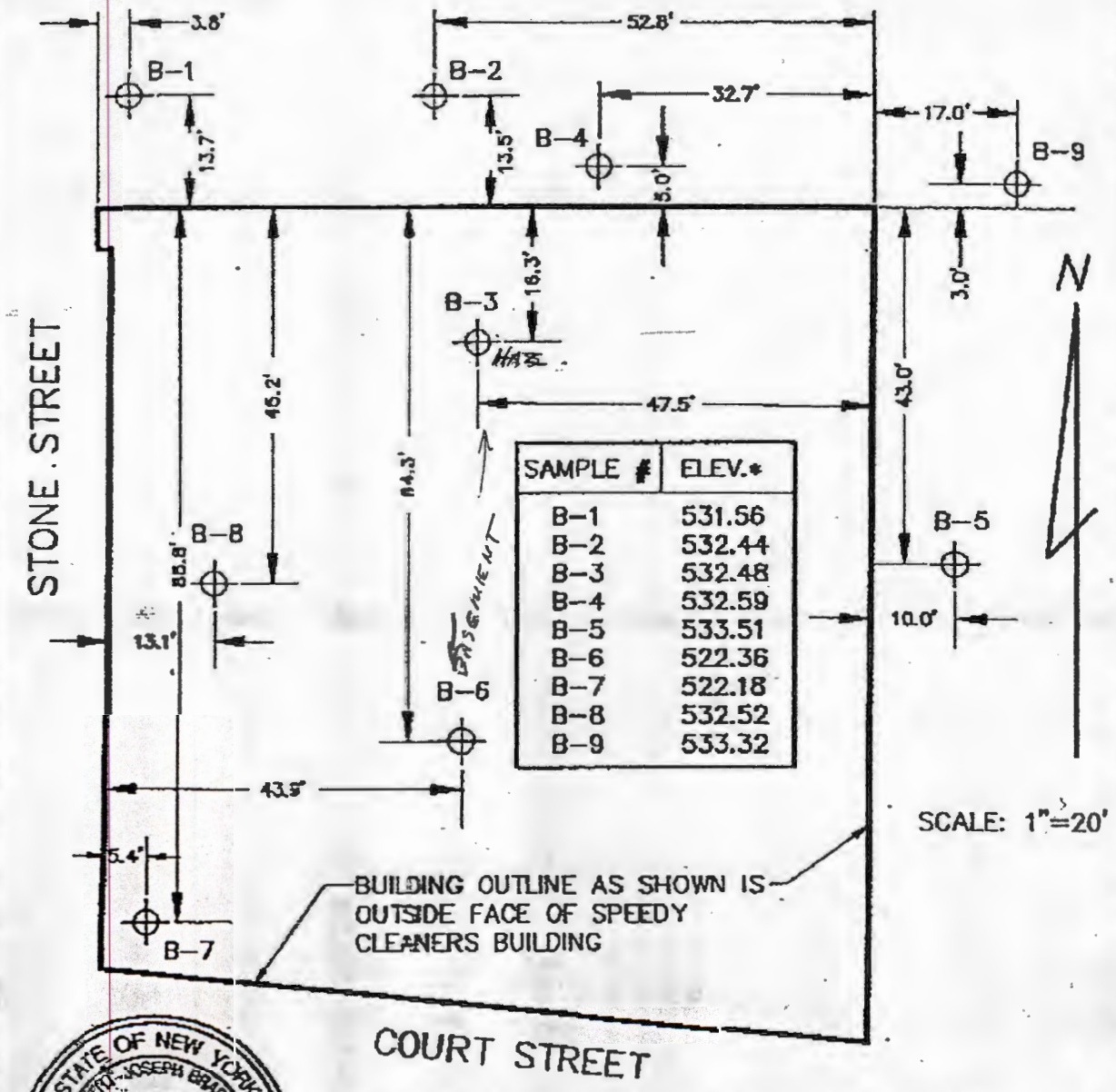
AREA OF CONTAMINATED SOIL (ASSUMED)

● CONTAMINATED SOILS DETECTED BY SEELER ASSOCIATES OR LECHASE

O? EMPIRE SOILS BORINGS FOR B&L: REPORTED TO BE CLEAN (APPROXIMATE LOCATIONS)

? LOCATIONS WHERE DATA COULD NOT BE COLLECTED

CITY OF ROCHESTER
SPEEDY CLEANERS
SAMPLE LOCATIONS



SAMPLE #	ELEV.*
B-1	531.56
B-2	532.44
B-3	532.48
B-4	532.59
B-5	533.51
B-6	522.36
B-7	522.18
B-8	532.52
B-9	533.32

STATE OF NEW YORK ROBERT JOSEPH BRADLEY 049847 LICENSED LAND SURVEYOR

Robert J. Bradley

* NOTE: ELEVATIONS OF SAMPLE LOCATIONS ARE BASED ON U.S.C.&G.S. MONUMENT "COURT", ELEV. 525.32, ROCHESTER CITY DATUM.

WE, LARSEN ENGINEERS, CERTIFY THAT THIS MAP WAS MADE ON JAN. 5, 1994 FROM NOTES OF A FIELD SURVEY MADE ON JAN. 4, 1994.

Robert J. Bradley

ROBERT J. BRADLEY, NYSPLS 049847

NO ALTERATION PERMITTED HEREON EXCEPT AS PROVIDED UNDER SECTION 7209 SUBDIVISION 2 OF THE NEW YORK STATE EDUCATION LAW.

LARSEN
700 WEST METRO PARK, ROCHESTER, NEW YORK 14623-2678
(716)272-7310 FAX (716)272-0159

LOZIER LABORATC
909 CULVER ROAD
ROCHESTER, NEW YORK 14609
716-654-8350

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 7

To Kris	From Dennis
Co. Marcor	Co.
Dept.	Phone #
Fax #	Fax #

CLIENT :	MARCOR OF NY	DATE REC'D. :	12/16/93
	120 ELMGROVE PARK	LABORATORY NO. :	93126691
	ROCHESTER, NEW YORK 14624	REPORT DATE :	01/04/93
	ATTN : KRIS KOHRT	RE :	RO-00463-001

SAMPLE INFORMATION

SAMPLE DATE :	12/16/93	LOCATION :	LeCHASE
SAMPLE TIME :	NOT REPORTED	TYPE OF SAMPLE :	SOIL
NUMBER OF SAMPLES :	1	SAMPLER :	CLIENT

TOXICITY CHARACTERISTIC LEACHATE PROCEDURE

T.C.L.P. METALS	EXCAVATED SOIL	MATRIX SPIKE %	LIMITS	UNITS	METHOD NUMBER	DATE ANALYZED
ARSENIC	<0.10	103	5.0	mg/l	7060	12/21
BARIUM	<5.0	98.9	100.	mg/l	7080	12/17
CADMIUM	<0.05	103	1.0	mg/l	7130	12/21
CHROMIUM	<0.05	89.2	5.0	mg/l	7190	12/21
LEAD	<0.20	102	5.0	mg/l	7420	12/21
MERCURY	<0.10	100	0.2	mg/l	7471	12/22
SELENIUM	<0.10	91.4	1.0	mg/l	7740	12/17
SILVER	<0.05	104	5.0	mg/l	7760	12/27
COPPER	<0.05	102	-	mg/l	7210	12/23
ZINC	0.14	98.1	-	mg/l	7950	12/22

All analyses were performed by methods outlined in Federal Register rules and regulations Volume 55, No. 61, Part 261, Appendix II, of March 29, 1990

NYSDOH LAB ID # 10390

LABORATORY DIRECTOR

LOZIER LABORATORIES, INC.
909 CULVER ROAD
ROCHESTER, NEW YORK 14609
716-654-6350

NEW YORK STATE
APPROVED
ENVIRONMENTAL LABORATORY

MARCOR OF NY / LAB # 93126691

TOXICITY CHARACTERISTIC LEACHATE PROCEDURE

VOLATILE ORGANICS	EXCAVATED SOIL	LIMITS	UNITS
BENZENE	<0.25	0.50	mg/l
METHYL ETHYL KETONE	<0.50	200	mg/l
CARBON TETRACHLORIDE	<0.25	0.50	mg/l
CHLOROBENZENE	<0.25	100	mg/l
CHLOROFORM	<0.25	6.	mg/l
1,2-DICHLOROETHANE	<0.25	0.50	mg/l
1,1-DICHLOROETHENE	<0.25	0.70	mg/l
TETRACHLOROETHENE	<0.25	0.70	mg/l
TRICHLOROETHENE	<0.25	0.50	mg/l
VINYL CHLORIDE	<0.50	0.20	mg/l

SURROGATE RECOVERIES :

1,2-DICHLOROETHANE d-4	101 %
TOLUENE d-8	102 %
BROMOFLUOROBENZENE	100 %

Analysis performed by Method 8240 on a TCLP extract. 12/29/93

Extraction procedure performed 12/17/93.

NYSDOH LAB ID # 10390

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TOXICITY CHARACTERISTIC LEACHATE PROCEDURE

SEMI-VOLATILES	EXCAVATED SOIL	LIMITS	UNITS
1,4-DICHLOROBENZENE	<0.10	7.5	mg/l
HEXACHLOROETHANE	<0.10	3.	mg/l
NITROBENZENE	<0.10	2.	mg/l
HEXACHLOROBUTADIENE	<0.10	0.50	mg/l
2,4,6-TRICHLOROPHENOL	<0.10	0.20	mg/l
2,4,5-TRICHLOROPHENOL	<0.50	400	mg/l
2,4-DINITROTOLUENE	<0.10	0.13	mg/l
HEXACHLOROBENZENE	<0.10	0.13	mg/l
PENTACHLOROPHENOL	<0.50	100	mg/l
PYRIDINE	<0.10	5.	mg/l
o-CRESOL	<0.10	200	mg/l
m + p-CRESOL	<0.10	200	mg/l

SURROGATE RECOVERIES :

NTB-d5	84 %
2-FLBP	80 %
TER-d14	84 %

Analysis performed by Method 8270, GC/MS on a TCLP extract, 01/04/94

Extraction procedure performed 12/17/93

LABORATORY DIRECTOR

LOZIER LABORATORIES, INC.
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ROCHESTER, NEW YORK 14609
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ENVIRONMENTAL LABORATORY

MARCOR OF NY / LAB # 931266091

TOXICITY CHARACTERISTIC LEACHATE PROCEDURE

PARAMETER	EXCAVATED SOIL	LIMITS	UNITS
PESTICIDES :			
CHLORDANE	<0.01	0.03	mg/l
ENDRIN	<0.01	0.02	mg/l
HEPTACHLOR	<0.01	0.008	mg/l
LINDANE	<0.01	0.4	mg/l
METHOXYCHLOR	<0.01	10.0	mg/l
TOXAPHENE	<0.01	0.5	mg/l
HERBICIDES :			
2,4-D	<0.01	10.0	mg/l
2,4,5-TP (SILVEX)	<0.01	1.0	mg/l

Pesticide analyses performed by EPA Method 3510/8080.
Herbicide analyses performed by EPA Method 3510/8150.

Analyses performed on TCLP extracts, 01/04/94.

NYSDOH LAB ID # 10390

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MARCOR OF NY / LAB # 93126691

POLYCHLORINATED BIPHENYLS

PARAMETER	EXCAVATED SOIL	UNITS
PCB-1221	<0.01	mg/kg
PCB-1232	<0.01	mg/kg
PCB-1016	<0.01	mg/kg
PCB-1242	<0.01	mg/kg
PCB-1248	<0.01	mg/kg
PCB-1254	<0.01	mg/kg
PCB-1260	<0.01	mg/kg
PCB-1262	<0.01	mg/kg
PCB-1268	<0.01	mg/kg
TOTAL PCB's	<0.01	mg/kg

Analysis performed by EPA Method 8080, 12/23/93.

NYSDOH LAB ID # 10390

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ROCHESTER, NEW YORK 14609
716-654-6350

NEW YORK STATE
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MARCOR OF NY / LAB # 93126691

PAGE 6

LABORATORY REPORT

PARAMETER	EXCAVATED SOIL	UNITS	METHOD NUMBER	DATE ANALYZED
pH	9.55	S.U.	EPA 9040	12/17
FLASH POINT	133.2 F	Degrees F	SW 846 1010	12/17
TOTAL CYANIDE	<0.50	mg/kg	EPA 335.2	12/21
% SOLIDS	90.7	%	EPA 160.3	12/30
PAINT FILTER TEST	<1.0	ml	SW 846 9095	12/17
REACTIVE SULFIDE	<10	mg/kg	EPA 376.1	12/17
TOX *	84	mg/kg	*	12/28

* TOX analysis performed by NYS Certified Lab No. 11140, using EPA Method 600/4-84-008, Append. D, Extractable Oragnic Halides.

NYSDOH LAB ID # 10390

LABORATORY DIRECTOR

LOZIER LABORATORIES, INC.

909 CULVER ROAD
ROCHESTER, NEW YORK 14609
716-654-8350

NEW YORK STATE
APPROVED
ENVIRONMENTAL LABORATORY

CLIENT :	MARCOR OF NY	DATE REC'D. :	01/05/93
	120 ELMGROVE PARK	LABORATORY NO. :	94010061
	ROCHESTER, NEW YORK 14624	REPORT DATE :	01/06/93
	ATTN : KRIS KOHRT	RE :	RO-00463-001

SAMPLE INFORMATION

SAMPLE DATE :	01/05/94	LOCATION :	LeCHASE
SAMPLE TIME :	3:00 PM	TYPE OF SAMPLE :	SOIL
NUMBER OF SAMPLES :	1	SAMPLER :	CLIENT

LABORATORY REPORT

PARAMETER	EXCAVATED SOIL SE3-1953	UNITS	METHOD NUMBER	DATE ANALYZED
FLASH POINT	>140 F	Degrees F	SW 846 1010	01/05

NYSDOH LAB ID # 10390

LABORATORY DIRECTOR

Form Updated: 11/08/91

FORM # 05535F1

MARCOR

CHAIN OF CUSTODY

LABORATORY NAME: LOZIER

ANALYSIS DUE DATE:

CLIENT: LeChase

PROJECT NAME & NUMBER: RO-00463-001

P.O.#: 11740

SAMPLE PRESERVE	DATE:	TIME:	COMP.	GRAB	SAMPLE LOCATION:	NUMBER OF CONTAINERS	TYPE OF ANALYSIS: pH	Flashpoint	Electrical Conductivity (EC)	TOX	PCB's	Total Cyanide	% Solids	Paint Filter Test	Full TCLP + Cat 3	SAMPLE TYPE, SAMPLE # & COMMENTS:
NA	12/16/93		X		EXCAVATED SOIL	2	X	X	X	X	X	X	X	X	X	SOIL, SE3 MCC

CAUTION - SAMPLE EXTREMELY AROMATIC ONLY OPEN IN HOOD

REMARKS: FAX RESULTS TO: KRIS KOHRT 297-6852 (FASTEST POSSIBLE TURNAROUND)

SAMPLED BY: KRIS KOHRT

PROJECT MANAGER: KRIS KOHRT

	1	2	3	4
RELINQUISHED BY:	Kris Kohrt SIGN	SIGN	SIGN	SIGN
	12/16/93 DATE 4:25 PM TIME	DATE TIME	DATE TIME	DATE TIME
RECEIVED BY:	SIGN	SIGN	SIGN	SIGN
	DATE TIME	DATE TIME		DATE TIME

New York State Department of Environmental Conservation
Division of Hazardous Waste Remediation
6274 East Avon-Lima Road, Avon, New York 14414-9519
Telephone: (716)226-2466

file

Langdon Marsh
Acting
Commissioner

March 9, 1994

CORRECTED COPY

Mr. Edward Doherty, Commissioner
Department of Environmental Services
City of Rochester
30 Church Street - Room 300B
Rochester, NY 14614-1290

Dear Mr. Doherty:

Re: **Court Street Parking Garage**
Rochester (C), Monroe (C)

This office has reviewed the (1) City of Rochester Investigation Report and Soil Removal Work Plan and (2) the City of Rochester Soil Remediation Feasibility Study. Both documents are dated February 1994.

The Department considers the two City of Rochester reports to represent an interim remedial measure (IRM) for soil removal in depicted areas near the proposed Court Street Parking Garage. This is consistent with the draft consent order currently under negotiation with the City of Rochester and this Department. Consequently, the comments provided in this letter are are based on an evaluation of the reports as an IRM work plan.

As an initial matter, the Department does not require that an IRM work plan include a "feasibility study". Further, the document identified by the City as a "feasibility study" does not satisfy the requirements of a "feasibility study" as that term is normally understood. These requirements include, but are not limited to: an evaluation of remedial technologies; development, screening, and detailed analysis of alternatives; and final remedy selection. Therefore, to avoid confusion, the Department recommends that the title of the document currently identified as a "feasibility study" be changed to "Analysis of Soil Remediation Removal Alternativess."

The following comments were discussed with Mark Gregor of your office on March 8, 1994 and must be addressed prior to acceptance of the IRM work plan:

1. A health and safety plan which addresses both on-site workers and the community must be included as part of the IRM work plan;

2. There is an inconsistency between the two reports; one has a screening volatile organic compound concentration of 10 ppm and the other report has 20 ppm. The criteria for contaminated soil and debris excavation shall include (1) any visibly contaminated soil and debris and (2) soil and debris which exhibit 10 ppm or greater of total volatile organics as detected by an HNu photoionization detector;

3. For all phases of the IRM soil removal, confirmatory soil samples must be taken in accordance with AppendixK of the Soil Removal Work Plan. The results of the soils analyses shall be compared to the cleanup criteria stated in the Spill Technology and Remediation Series (STARS) Memo #1. If the contaminant levels in the remaining soils exceed the cleanup criteria, then excavation must continue until the cleanup levels are achieved;

4. Since there will likely be residual soil contamination, a soil venting system must be installed to minimize any impacts to the proposed parking garage, tunnel and tower areas. The IRM work plan must specify the type and design of the venting system that will be installed to address residual contamination;

5. All soil samples should be placed in wide-mouthed glass jars instead of 40 ml glass bottles. The excess handling of the samples associated with 40 ml glass bottles can bias analytical results;

6. The procedures used for soil excavation, staging and disposal, waste transportation and disposal and decontamination should be specified for the Phase I and Phase II removal actions identified in the Soil Remediation Feasibility Study document. This will avoid confusion in the future. The procedures specified in section 4 of the Soil Removal Work Plan would be acceptable; and

7. A report must be prepared which certifies completion of the IRM in accordance with the accepted work plan. The report must be stamped by a NYS Professional Engineer and include, but not be limited to, the following items: deviations to the approved work plan; the

extent and quantify of soil removed; all analytical data; all waste disposal documentation; and record drawings of the soil venting system.

Finally, the Department has attempted to provide a prompt review of the documents submitted by the City of Rochester for this development project. Consequently, verbal comments were obtained from the New York State Department of Health on your feasibility study only and have been incorporated into this letter. Every effort will be made to continue this cooperation.

If you have any questions, please contact me at 226-2466. Thank you for your continued cooperation.

Very truly yours,

Mary Jane Peachey

Mary Jane Peachey, P. E.
Regional Hazardous Waste
Remediation Engineer
Division of Hazardous
Waste Remediation

db

cc: J. Brennan
R. Elliott
J. Hazel
D. Napier

New York State Department of Environmental Conservation
6274 East Avon-Lima Road, Avon, NY 14414

Langdon Marsh
Acting Commissioner

IMMEDIATE ATTENTION

TO: Edward Doherty

FROM: Mary Jane Peachey, NYSDEC, Region 8

DATE: March 11, 1994

NUMBER OF PAGES: 3 (PLUS COVER)

MESSAGE:

Our telecopier number is (716)226-2466, Extension 335.

Our operator's telephone number is (716)226-2466, Extension 340.

New York State Department of Environmental Conservation
6274 East Avon-Lima Road, Avon, NY 14414

Thomas C. Jorling
Commissioner

IMMEDIATE ATTENTION

TO: Jim Hazel - DEE

FROM: Mary Jane Peachey - Region 8

DATE: March 10, 1994

NUMBER OF PAGES: (PLUS COVER)

MESSAGE:

Our telecopier number is (716)226-2466, Extension 335.

Our operator's telephone number is (716)226-2466, Extension 340.

bcc: F. Ricotta/P. Bush
M. O'Toole

CITY OF ROCHESTER
DEPARTMENT OF ENVIRONMENTAL SERVICES
ENVIRONMENTAL QUALITY
(716)428-5978

DATE: 3/14/94

TO: MARY JANE PEACHEY

NYS-DEC

RE: RESPONSE TO COMMENTS ON PLANS FOR SPEEDYS SITE

WE ARE SENDING YOU THE FOLLOWING:

Copies ☐ Reports ☐ Memo ☐ Letter ☒ FAX FOUR PAGES

TRANSMITTED:

☒ For your approval ☐ For your use ☐ As you requested

☐ To be Returned ☐ To Distribute ☒ For Review and Comment

Remarks:

ATTACHED IS OUR RESPONSE LETTER TO COMMENTS FROM YOU AND THE HEALTH DEPARTMENTS. WE ARE PROCEEDING TO MAKE CHANGES TO THE SOILS MGT PLAN (NOW THE IRM PLAN) AND THE HEALTH AND SAFETY PLAN. THE REVISED PLANS WILL BE PROVIDED ASAP. IF THIS LETTER ADDRESS COMMENTS TO YOUR SATISFACTION PLEASE LET US KNOW. WE ARE PREPARED TO START SOME WORK ON WEDNESDAY.

Copies to: R. ELLIOTT - MCDOH
D. NAPIER - NYS-DOH

Signed: Mark D. Gregor

Mark D. Gregor
Environmental Specialist

City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of
Environmental Services

Office of the Commissioner
City Hall, Room 300-B
30 Church Street
Rochester, New York 14614-1290

March 14, 1994

Mary Jane Peachey, P.E.
Regional Hazardous Waste Remediation Engineer
New York State Department of Environmental Conservation
6274 E.Avon-Lima Road
Avon, New York 11414

Re: Response to comments Court Street Parking Garage IRM

Dear Ms. Peachey:

We have reviewed your March 9, 1993 comments on the City's Investigation Report and Soil Removal Work Plan and the Soil Remediation Feasibility Study. We will modify the soils management plan to address all areas of soil contamination in a single IRM plan. If the following responses to your comments are acceptable, then we will incorporate them in the IRM plan. Comments by the Health Departments and our proposed responses are addressed in this letter also.

Additionally we would like to combine the MARCOR site Health and Safety Plan for workers and the Community Health and Safety Plan into one document. Please be aware that the City has awarded the Speedy's building demolition and excavation contract to a different contractor, Bianchi Trison Corporation (BTC). We will require that BTC perform the same worker and community health and safety procedures. However, BTC may choose to incorporate these requirements in its own health and safety plan. We will provide the new HASP if one is prepared.

Response to NYS-DEC 3/9/94 Comments (see attached letter):

1. A Community Health and Safety Plan has been prepared and submitted to the NYS-DEC and the health departments. worker HtS Plan

2. The criteria for determining if soil or excavation debris is contaminated will be if the soil is visibly contaminated and/or if soil that exhibits an HNu photoionization detector reading of 10 ppm or more. or ?

3. Confirmatory samples for all areas where ~~stoddard~~ contaminated soils have been removed will be performed as indicated in Appendix K of the Feb. 1994 Soil Removal Work Plan. We will compare the detected levels to criteria in the Stars Memo #1. Depending on the location and structural limitations of the areas where soils remain above the STARs criteria either additional soil removal or gas ventilation system extensions will be installed. See next response. → eliminate

4. The IRM plan will be revised to include a layout and design of a basic gas ventilation system for the entire site to prevent infiltration of vapors from residual contamination into the tunnel and garage and other below grade structures. Opportunities for possible modifications of the system

needed to address areas where remaining soils exceed the STARs criteria will be incorporated into the basic system design.

5. The sampling methodology will be changed to require the use of wide mouth glass bottles.

6. The procedures for the Phase 1 and Phase 2 excavation, soil transportation, and disposal action described in the Feasibility Study will be detailed in the IRM Plan. The basic procedures for the Phase 1 and 2 areas will be consistent will those already in Section 4 of the soil removal work plan. Information regarding soil removal operations, excavation phasing, verification sampling, soil loading, transportation, and the disposal facility(s) will be added as requested.

7. An IRM report will be prepared as requested. as-builts, construction certification

Response to NYS-DOH Community Air Monitoring Plan provided by Dave Napier 3/10/94:

The Community Air Monitoring Plan specifies a threshold of 5 ppm total VOC's above background at the perimeter of the work site. This is consistent with the threshold established in the draft Community Health and Safety Plan. For this project the work area perimeter will be the work site fenceline. The exclusion zone will be the general area of excavation within the work area.

We will add the particulate monitoring requirements. However because soil conditions are expected to be damp we would like to use periodic particulate monitoring upwind and downwind of the exclusion zone within the work site to determine if conditions warrant continuous air monitoring and dust suppression techniques. A technician will monitor and document VOC and particulate concentrations upwind and downwind at the perimeter of the exclusion zone using direct reading instruments at least once every two hours during excavation and loading . The Site Safety and Health Officer will also be monitoring removal operations to determine if more or continuous monitoring is prudent. We are concerned that other site construction activities or the heavy traffic on South Clinton Avenue (the prevailing down wind direction) could generate localized particulate concentrations at the fenceline. This could potentially result in unnecessary delays for the contaminated soil removal activities.

Response to MC-DOH March 10, 1994 comments (see attached letter)

Soil Remediation Feasibility Study

1. Verification soil samples will be collected and submitted for laboratory analysis to determine residual contaminant levels as indicated in response number 3 to the NYS-DEC comments.

2 A gas ventilation system design will be provided in more detail and will be installed. At present there are no plans to connect the system under the garage and right-of-way to Bausch and Lombs system. We believe that the groundwater table will not adversely affect the vent system and the use of sumps that can be pumped will address temporary flooding conditions.

Investigation report and soil Removal Work plan

1. Ground water remediation is not currently planned in any IRM activities with the exception of pumping potentially contaminated water that may accumulate in the bottoms of excavations into drums. The need for any additional activities will be evaluated after the completion of the IRM.

Tunnel Project Health and Safety Plan

include specific action levels

1. The contractor Health and Safety plan will be amended to specify PPE and contaminant levels that will trigger changes in the required level of protection

2. All workers in the exclusion zone will be required to have completed training in compliance with 29 CFR 1910.120.

3. A map showing the location of area hospitals will be included in the HASP

4. The HASP will provide more information on site security and control measures.

Mark Gregor is available to discuss any additional comments or questions. If these general responses are acceptable, we will prepare and distribute a new IRM soils management workplan and combined Health and Safety Plan on Tuesday. Please note that we may need to proceed with some preliminary activities before we receive your written approval of the plans. If this is the case we will conform to the plans already provided to you except as modified by this letter to address agency comments. Thank you for your assistance.

Edward J. Doherty
Commissioner
Department of Environmental Services

MDG
Attach.
xc. R.Elliott, MC-DOH
D.Napier, NYS-DOH
T.Caffoe, NYS-DEC
J.Brennan
M.Gregor
N.Burton
S.Feurerstein
D.Zariczny
A.Klumpp
T.Seeler

4. Since there will likely be residual soil contamination, a soil venting system must be installed to minimize any impacts to the proposed parking garage, tunnel and tower areas. The IRM work plan must specify the type and design of the venting system that will be installed to address residual contamination;

5. All soil samples should be placed in wide-mouthed glass jars instead of 40 ml glass bottles. The excess handling of the samples associated with 40 ml glass bottles can bias analytical results;

6. The procedures used for soil excavation, staging and disposal, waste transportation and disposal and decontamination should be specified for the Phase 1 and Phase II removal actions identified in the Soil Remediation Feasibility Study document. This will avoid confusion in the future. The procedures specified in section 4 of the Soil Removal Work Plan would be acceptable; and

7. A report must be prepared which certifies completion of the IRM in accordance with the accepted work plan. The report must be stamped by a NYS Professional Engineer and include, but not be limited to, the following items: deviations to the approved work plan; the extent and quantify of soil removed; all analytical data; all waste disposal documentation; and record drawings of the soil venting system.

Finally, the Department has attempted to provide a prompt review of the documents submitted by the City of Rochester for this development project. Consequently, verbal comments were obtained from the New York State Department of Health on your feasibility study only and have been incorporated into this letter. Every effort will be made to continue this cooperation.

If you have any questions, please contact me at 226-2466. Thank you for your continued cooperation.

Very truly yours,

Mary Jane Peachey

Mary Jane Peachey, P. E.
Regional Hazardous Waste
Remediation Engineer
Division of Hazardous
Waste Remediation

db

cc: J. Brennan
R. Elliott
J. Hazel

Dave Napier's Revision

Community Air Monitoring Plan

Real-time air monitoring, for volatile compounds and particulate levels at the perimeter of the work area is necessary. The plan must include the following:

- Volatile organic compounds must be monitored at the downwind perimeter of the work area on a continuous basis. If total organic vapor levels exceed 5 ppm above background, work activities must be halted and monitoring continued under the provisions of a Vapor Emission Response Plan. All readings must be recorded and be available for State (DEC & DOH) personnel to review.

- Particulates should be continuously monitored upwind, downwind and within the work area at temporary particulate monitoring stations. If the downwind particulate level is 150 ug/m3 greater than the upwind particulate level, then dust suppression techniques must be employed. All readings must be recorded and be available for State (DEC & DOH) personnel to review.

Vapor Emission Response Plan

If the ambient air concentration of organic vapors exceeds 5 ppm above background at the perimeter of the work area, activities will be halted and monitoring continued. If the organic vapor level decreases below 5 ppm above background, work activities can resume. If the organic vapor levels are greater than 5 ppm over background but less than 25 ppm over background at the perimeter of the work area, activities can resume provided:

- the organic vapor level 200 ft. downwind of the work area or half the distance to the nearest residential or commercial structure, whichever is less, is below 5 ppm over background.

If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown. When work shutdown occurs, downwind air monitoring as directed by the Safety Officer will be implemented to ensure that vapor emission does not impact the nearest residential or commercial structure at levels exceeding those specified in the Major Vapor Emission section.

MONROE COUNTY

Department of Health

Robert L. King
County Executive

Andrew S. Doniger, M.D., M.P.H.
Director

March 10, 1994

Mr. Mark Gregor
Department of Environmental Services
City of Rochester
30 Church Street - Room 300-B
Rochester, New York 14614-1290

Re: Court Street Parking Garage

Dear Mr. Gregor:

Technical staff of the Monroe County Health Department have reviewed the Investigation Report and Soil Removal Work Plan, Soil Remediation Feasibility Study, Tunnel Project Health and Safety Plan and the Community Health and Safety Plan for the above referenced project. We have the following comments:

Soil Remediation Feasibility Study

1. Soil sampling and analysis should be conducted rather than relying on a portable organic vapor analyzer for verification of contaminated soil removal.

2. It is not clear whether a gas ventilation system will be installed; what conditions are necessary for it to be deemed appropriate by the City?
The proposed passive gas ventilation system lacks details. The gas collection pipes for the garage and Bausch and Lomb building are at different levels: how will they be connected? Is one riser sufficient? Will the venting system be effective if flooded with groundwater?

Investigation Report and Soil Removal Work Plan

1. Groundwater sample results indicate some contamination. Will groundwater remediation be required? If so, how

Community Air Monitoring Plan

Major Vapor Emission

If any organic levels greater than 5 ppm over background are identified 200 feet downwind from the work area or half the distance

to the nearest residential or commercial property, whichever is less, all work activities must be halted.

If, following the cessation of the work activities, or as the result of an emergency, organic levels persist above 5 ppm above background 200 feet downwind or half the distance to the nearest residential or commercial property from the work area, then the air quality must be monitored within 20 feet of the perimeter of the nearest residential or commercial structure (20 Foot Zone).

If efforts to abate the emission source are unsuccessful and if the following levels persist for more than 30 minutes in the 20 Foot Zone, then the Major Vapor Emission Response Plan shall automatically be placed into effect;

- if organic vapor levels are approaching 5 ppm above background.

However, the Major Vapor Emission Response Plan shall be immediately placed into effect if organic vapor levels are greater than 10 ppm above background.

Major Vapor Emission Response Plan

Upon activation, the following activities will be undertaken:

1. All Emergency Response Contacts as listed in the Health and Safety Plan of the Work Plan will go into effect.

2. The local police authorities will immediately be contacted by the Safety Officer and advised of the situation.

3. Frequent air monitoring will be conducted at 30 minutes intervals within the 20 Foot Zone. If two successive readings below action levels are measured, air monitoring may be halted or modified by the Safety Officer.

92275PR00524

2. It appears that site workers must meet the training requirements of 29 CFR 1910.120 as well as supervisors.

3. The map (Figure #1), showing the location of area hospitals, was not included.

4. Site security and control measures should be specified.

If you have any questions please contact me at 274-6904.

Sincerely,

Joseph J. Albert
Sr. Public Health Sanitarian

xc: Dr. Doniger
Ms. Hartshorn
Mr. Napier
Ms. Peachey
file

City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of
Environmental Services

Office of the Commissioner
City Hall, Room 300-B
30 Church Street
Rochester, New York 14614-1290

Todd

March 17, 1994

Mary Jane Peachey, P.E.
Regional Hazardous Waste Remediation Engineer
New York State Department of Environmental Conservation
6274 E. Avon-Lima Road
Avon, New York 11414

Re: Court Street Parking Garage IRM Health and Safety Plan

Dear Ms. Peachey:

Attached please find two copies of the IRM Health and Safety Plan (HASP) for the Court Street Parking Garage site. MARCOR's HASP includes the Community Health and Safety Plan presented in draft form to you last week. MARCOR is a subcontractor to LeChase and will be on site for all Phase I excavation work as defined in the IRM Work Plan. The City will require that Bianchi Trison Corporation incorporate all of the substantive measures of this HASP into its own HASP for the Phase II area. For your information we now anticipate that workers within the exclusion zone will be wearing air purifying respirators fitted with organic vapor cartridges. During test pit excavations performed on Tuesday breathing zone levels of total VOC's in excess of 5 ppm were observed.

Please let me know if you have any questions. As we have discussed, any work that we need to complete before you are able to provide written approval will be conducted in accordance with the plans and comments that have been received.

Sincerely,

Mark D. Gregor
Environmental Specialist

Enc.
xc. R.Elliott
D.Napier
T.Caffoe
E.Doherty w/o enc
J.Brennan
N.Burton w/o enc
S.Feurerstein
D.Zariczny w/o enc
A.Klumpp
T.Seeler

City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of Environmental Services

Office of the Commissioner
Division of Environmental Quality
30 Church Street, Rm. 300B
Rochester, New York 14614-1278

March 20, 1994

Mary Jane Peachey, P.E.
New York Department of Environmental Conservation
6274 E. Avon Lima Road
Avon, New York 14414

Re: Court Street Parking Garage IRM Vent System - Detailed Drawings

Dear Ms. Peachey:

As requested in Todd Caffoe's January 5 letter to me, I am providing proposed final detailed drawings with noted specifications for the Court Street Garage soil vent system. The design has been prepared in accordance with the approved piping system layout.

Enclosed are two copies of the following three draft drawings prepared by Seeler Associates:

1. Soil Gas Ventilation System Layout
2. Layout of Piping and Related Equipment for the Soil Vapor Extraction System (1 0f 2)
3. Electrical Layout for the Soil Vapor Extraction System (2 of 2)

We will provide final sealed drawings after addressing any comments that you may have. Please let me know if you or Todd have any questions. Thank you for your assistance.

Sincerely,

Mark D. Gregor
Environmental Specialist
428-5978

attach.
xc.T.Caffoe,NYS-DEC
R.Elliott,MC-DOH
D.Napier,NYS-DOC
James Hazel, NYS-DEC w/o attach
E.Doherty w/oattach
J.Brennan w/o attach
N.Burton w/o attach
S.Feuerstein
A.Klumpp
T.Seeler
g:\envqual\irmchan2

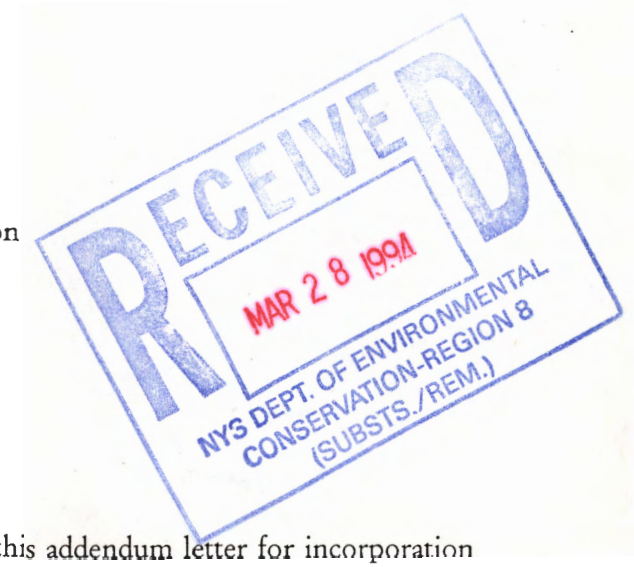
City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of
Environmental Services

Office of the Commissioner
City Hall, Room 300-B
30 Church Street
Rochester, New York 14614-1290

March 23, 1994



Todd Caffoe
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414

Re: Court Street Parking Garage IRM

Dear Mr. Caffoe:

We have reviewed your March 21 comments and prepared this addendum letter for incorporation into the IRM Work Plan and the Site Health and Safety Plan. If the addendum is acceptable, please send us a brief letter indicating that the Department's concerns have been adequately addressed and also let us know where we should forward the consent order for DEC signature and execution.

We believe that our plan is a responsible approach to both addressing soil contamination and the health and safety of the future occupants and users of the garage and tunnel facilities. Thank you for your cooperation and timely comments during the preparation of the plans. Let me know if you have any questions.

Sincerely,

Mark D. Gregor
Environmental Specialist

attach.
xc M.J.Peachey
R.Elliott
D.Napier
E.Doherty
L.Kash
J.Brennan
A.Klumpp
T.Seeler

COURT STREET PARKING GARAGE IRM
ADDENDUM NO.1

Comment 1

Page 4-16, Please elaborate upon what criteria will be used to install additional sections to the ventilation system. As we discussed in our March 17, 1994 telephone conversation, the ventilation system should be expanded into areas where contaminated soils remain above the clean-up criteria. In order to actively remediate any remaining contaminated soils, the piping should be within the contaminated soils. The final configuration of the ventilation system must be presented in the IRM completion report.

Response:

The installation of additional sections of ventilation pipe will be based on the following criteria:

1. If stained soil and/or chemical compounds at concentrations greater than the Department's recommended cleanup values are found in areas adjacent to new facilities and existing below grade structures that cannot be removed, then additional sections of vent pipe will be installed. The Spill Technology And Remediation series Memo #1 entitled the Petroleum-Contaminated Soil Guidance Policy (STARS) or the Technical Administrative Guidance Memorandum entitled "Determination of Soil Clean-up Objectives and Clean-up Levels" dated 1992 will serve as the source of the clean-up values. The new facilities and existing structures criteria were used to establish the basic vent system design concept that was included in the IRM work plan.

2. In areas outside of those mentioned above, where chemical compounds are found at concentrations greater than established clean-up levels, additional vent pipe will be installed or the contaminated soil will be left in place and covered with a minimum two foot layer of clean shot-rock rubble. This layer of rock will extend from the contaminated zone to the nearest ventilation pipe. The shot rock will provide a zone of enhanced air permeability which should enable the ventilation system to entrain vapors escaping off the contaminated soil. The decision regarding which method to use will be made based on the best information avialable at the time regarding the need for additions to the particular vent-riser system that will be affected.

In areas where ventilation is required, the ventilation intake pipe will be placed in the center of the contaminated zone and covered with select clean, washed Number 1 stone as specified in our original submittal dated March 1994.

Comment 2.

The design of the gravel pack for the slotted ventilation pipes should include a filter fabric wrap to prevent fine grained material from clogging the screens and the gravel pack.

Response:

We do not believe that the placement of filter fabric is necessary around the gravel pack. This is in part because the naturally dense soil, if left in place, is sufficiently dense that fine particles will not leave the soil matrix. Also the relatively small amount of fines present in the backfill material selected for use is not sufficient to cause a significant loss of pore space in the gravel pack.

Number 1 stone will be used as backfill. The grain size distribution data is presented in attachment 1.

Comment 3.

Prior to installation of the ventilation pipes, it should be determined whether a blower can be adequately sized to extract soil vapor from the piping system. It may be necessary to modify the design of the piping system to account for pressure losses or "dead areas" within the ventilation system.

Response:

Unfortunately, the finalization of the ventilation system layout will not be completed until our excavation work is done. As indicated above the conditions encountered during and after excavation will drive the system requirements. This limits our response to your question concerning blower sizing. We will consult with you regarding ventilation system layout modifications and blower specifications if it appears one or more blowers will be needed. Your concern over the creation of dead zones is also a concern to us. We have attempted to add flexibility to the ventilation system concept design by including three separate vent sections each with its own riser . This will reduce the air flow pressure friction loss from increases in pipe length and number of elbows and tees that an individual blower might have to overcome. The risers will terminate above grade along the east side of the new garage location.

The City's February "feasibility study" of interim remedial options did not recommend vapor extraction techniques because the uneven distribution and penetration of air was a concern. The decision was made to excavate contaminated soil because of these constraints. We believe that the proposed ventilation system will help diminish remaining soil contaminant levels as it prevents the infiltration of any vapors into the garage, tunnel, and Wintergarden. However, we still maintain that soil vapor extraction technology is not feasible or practical for the dense compacted till that will remain beneath much of the site.

Our proposed use of shot rock and gravel will limit the creation of dead zones between areas requiring ventilation and the air intake screened pipes. Our data indicated that the till is less contaminated than the soils and fill above. If the verification sampling indicates otherwise we will work with you to determine the best way to proceed.

Comment 4.

Section 6.0 Worker Health and Safety Plan- The plan must specify the action levels and types of Personal Protection Equipment (PPE). For example, there must be action levels to upgrade PPE to level C or level B. Also, the type of PPE associated with each level of protection must be specified. Please consult with Mr. David Napier of the New York State Department of Health for further details.

Response:

The action thresholds for changes in the level of PPE required for site workers have been established. We have prepared the attached General Protection Levels description for incorporation into the Health and Safety Plan (Attachment 2). Site work will begin in level D and be modified based on in-field monitoring results.

On page 4 of Marcor's Health and Safety Plan the action level of 5.0 ppm total organic vapor readings is identified as the trigger to upgrade from no respiratory protection (level D) to air purifying respirator fitted with a combination organic vapor /dust cartridge (level C). Assuming a protection factor of 10 for air purifying respirators, the action level for upgrade to supplied air respiratory protection (level B) is established at 50 ppm. Monitoring will take place both in the immediate area of the excavation and in the breathing zone of the workers. Monitoring at the limits of the exclusion zone and work site perimeter is addressed in the Community Health and Safety Plan.

Comment 5.

It must be documented that all workers in the exclusion zone meet the OSHA requirements in 29CFR 1910.120.

Response:

The contractor will provide documentation that all personnel within the exclusion zone have met the requirements of 1920.120. A daily site log will be kept by the SSHO, and the SSHO will require that any of the visitors or workers that enter the exclusion zone provide evidence that the individual has received the necessary training.

ADDENDUM 1
ATTACHMENT 1

SUBMITTAL COVER

BAUSCH & LOMB WORLD HEADQUARTERS
ROCHESTER, NEW YORK
PROJECT NO. 9213

LECHASE CONSTRUCTION INC.
300 TROLLEY BLVD.
ROCHESTER, NEW YORK 14606
L.C. PROJECT NO. 1900-01

LECHASE CONSTRUCTION

General Contractor
Construction Manager

300 Trolley Boulevard
P.O. Box 60830
Rochester, New York
14606-0830
716-254-3510
Fax 716-254-3871

TYPE OF SUBMITTAL (check one)

__ Product Data
__ Sample
__ Color Selection
__ Test Report
__ Schedule
__ Warranty
__ Record Document
__ Operating/Maintenance Data
__ Performance Data
__ ____________

RECEIVED JAN 13 1994 RAYMOND LECHASE

DESCRIPTION OF SUBMITTAL:

Product Name Drainage Fill Certification

Manufacturer same

Subcontractor/Supplier Dolomite Products Company Inc.

Section No.(s) 02710 Drawing No.(s) ________

Part/Paragraph 2.03B Detail Ref. ________

ARCHITECT'S ACTION

#1 STONE

APPPOVED

[signature]

1-12-94

SUBMITTED IN ACCORDANCE WITH PROJECT SPECIFICATIONS

SECTION Foundation Drainage

SUBMITTAL NO. 61

REVIEWED BY C.R. Capuano

DATE 12/20/93

Gradations of crushed stone; Penfield plant.
All values are percent passing.

SIEVE SIZE	# 2 CRUSHER RUN	# 1 CRUSHER RUN	2.03B DRAINAGE ITEM 605.0901 #1 STONE	#2 STONE	#1 & #2 MIXTURE
2"	100				
1 1/2"				100	100
1"		100	100	96	98
1/2"			95	12	54
1/4"	36	54	11	2	7
1/8"					
NO. 10			8		
NO. 20			2		
NO. 40	9	15			
No. 200	2.9	5.0	0.5	0.3	0.4

ATTACHMENT 2
GENERAL PROTECTION LEVELS

Equipment designed to protect the body against contact with known or anticipated chemical hazards have been divided into four categories according to the degree of protection afforded:

- Level A: Should be selected when the highest level of respiratory, skin and eye protection is needed.
- Level B: Should be selected when the highest level of respiratory protection is needed, but a lesser level of skin protection is required; Level B protection is the minimum level recommended on initial site entries until the hazards have been further defined by on-site studies.
- Level C: Should be selected when the types of airborne substances are known, the concentrations have been measured and the criteria for using air-purifying respirators are met. In atmospheres where no airborne contaminants are present, Level C provides dermal protection only.
- Level D: Should not be worn on any site with respiratory or skin hazards. This is primarily a work uniform providing minimal protection.

The level of protection selected is based primarily on:

- Types and measured concentrations of the chemical substances in the ambient atmosphere and their associated toxicity; and
- Potential or measured exposure to substances in air, splashes of liquids or other indirect contact with material due to the task being performed.

In situations where the types of chemicals, concentrations, and possibilities of contact are not known, the appropriate level of protection must be selected based on professional experience and judgement until the hazards may be further characterized. The individual components of clothing and equipment must be assembled into a full protective ensemble to protect the worker from site-specific hazards, while at the same time minimizing hazards and drawbacks of the personal protective gear itself. Ensemble components based on the

USEPA Levels of Protection are detailed below for levels B, C, and D protection.

Level B Protection Ensemble

Recommended

- Pressure-demand, full-facepiece self-contained breathing apparatus (MSHA/-NIOSH approved) or pressure-demand supplied-air respirator with escape SCBA;
- Chemical-resistant clothing (overalls and long-sleeved jacket; hooded one- or two-piece chemical splash suit; disposable chemical-resistant one-piece suit); disposable chemical-resistant one-piece suit);
- Inner and outer chemical resistant gloves;
- Chemical-resistant safety boots/shoes; and
- Hard hat.

Optional

- Coveralls.
- Disposable boot covers.
- Face shield.
- Long cotton underwear.

Meeting any one of the following criteria warrant the use of Level B protection:

The types and atmospheric concentrations of toxic substances have been identified and require the highest level of respiratory protection, but a lower level of skin and eye protection. These would be atmospheres:

- with concentrations Immediately Dangerous to Life and Health (IDLH)
- exceeding limits of protection afforded by a full-face air-purifying mask;
- containing substances for which air-purifying canisters do not exist or have low removal efficiency;

- containing substances requiring air-supplied equipment, but substances and/or concentrations do not represent a serious skin hazard;
- containing less than 19.5% oxygen; or
- with evidence of incompletely identified vapors or gases as indicated by direct reading organic vapor detection instrument, but those vapors and gases are not suspected of containing high levels of chemicals harmful to skin or capable of being absorbed through the intact skin.

Level B equipment provides a high level of protection to the respiratory tract, but a somewhat lower level of protection to skin. The chemical-resistant clothing required in Level B is available in a wide variety of styles, materials, construction detail and permeability. These factors all affect the degree of protection afforded. Therefore, a specialist should select the most effective, chemical-resistant clothing based on the known or anticipated hazards and task. Level B skin protection is selected by:

- Comparing the concentrations of identified substances in the air with skin toxicity data;
- Assessing the effect of the substance (at its measured air concentrations or splash potential) on the small area of the head and neck unprotected by chemical-resistant clothing.

Level C Protection Ensemble
Recommended

- Full-facepiece, air-purifying respirator equipped with MSHA and NIOSH approved organic vapor/acid gas/dust/msit combination cartridges or as designated by the Health and Safety Manager;
- Chemical-resistant clothing (overalls and long-sleeved jacket, hooded, one- or two-piece chemical splash suit or disposable chemical-resistant one-piece suit);
- Inner and outer chemical-resistant gloves;
- Chemical-resistant safety boots/shoes; and
- Hardhat.
- Coveralls;

- Disposable boot covers;
- Face shield;
- Escape mask;
- Long cotton underwear.

The use of Level C protection is permissible upon satisfaction of these criteria:

- Measured air concentrations of identified substances will be reduced by the respirator to below the substance's permissible exposure limit (PEL), threshold limit value (TLV), and/or the concentration is within the service limit of the cartridge;
- Atmospheric contaminant concentrations do not exceed IDLH levels; and
- Atmospheric contaminants, liquid splashes or other direct contact will not adversely affect the small area of skin left unprotected by chemical-resistant clothing.

Level C protection is distinguished from Level B by the equipment used to protect the respiratory system, assuming the same type of chemical-resistant clothing is used. The main selection criterion for Level C is that conditions permit wearing an air-purifying device. The device (when required) must be an air purifying respirator (MSHA/NIOSH approved) equipped with filter cartridges. Cartridges must be able to remove the substances encountered. Respiratory protection will be used only with proper fitting, training and the approval of a qualified individual. In addition, an air-purifying respirator can be used only if:

- Oxygen content of the atmosphere is at least 19.5% in volume;
- Substances are identified and concentrations measured;
- Substances have adequate warning properties;
- Individual passes a qualitative fit-test for the mask; and

- Appropriate cartridge/canister is used, and its service limit concentration is not exceeded.

An air monitoring program is part of all response operations when atmospheric contamination is known or suspected. It is particularly important that the air be monitored thoroughly when personnel are wearing air-purifying respirators. Continual surveillance using direct-reading instruments is needed to detect any changes in air quality necessitating a higher level of respiratory protection.

Level D Protection Ensemble

Recommended

- Coveralls;
- Safety boots/shoes;
- Safety glasses or chemical splash goggles;
- Hardhat.

Optional

- Gloves;
- Escape mask;
- Face shield.

The use of Level D protection is permissible upon satisfaction of these criteria:

- No hazardous air pollutants have been measured; and
- Work functions preclude splashes, immersion or the potential for unexpected inhalation of any chemicals; and
- Atmospheric contains at least 19.5% oxygen.

Level D protection is primarily a work uniform. It can be worn in areas where only boots can be contaminated, or where there are no inhalable toxic substances.

New York State Department of Environmental Conservation
Division of Hazardous Waste Remediation
6274 East Avon-Lima Road, Avon, New York 14414-9519

Telephone: (716) 226-2466

Langdon Marsh
Acting
Commissioner

March 31, 1994

Mr. Mark Gregor
City of Rochester
Department of Environmental Services
30 Church Street - Room 300B
Rochester, New York 14614-1290

Dear Mr. Gregor:

RE: Court Street Parking Garage
Interim Remedial Measure (IRM) Work Plan (March 1994)

This office has reviewed your March 23, 1994 letter regarding the IRM work plan. Your letter has satisfactorily addressed the comments contained in the Department's March 21, 1994 letter. The IRM Work Plan will be considered approved when the Order to which it is an appendix is executed on behalf of the Department. Please forward the signed originals of the Order to Mr. Jim Hazel at the DEE-Buffalo Office.

Please call me at 716-226-2466 if you have any questions. Thank you for your continued cooperation.

Sincerely,

Todd M. Caffoe
Environmental Engineer I
Division of Hazardous
Waste Remediation

c: M.J. Peachey
J. Hazel
D. Napier
R. Elliott
E. Doherty
J. Brennan

New York State Department of Environmental Conservation
Division of Hazardous Waste Remediation
6274 East Avon-Lima Road, Avon, New York 14414-9519

Telephone: (716) 226-2466

file

Langdon Marsh
Acting
Commissioner

CERTIFIED
RETURN RECEIPT REQUESTED

April 6, 1994

Mr. James Goff
Staff Vice-President
Bausch & Lomb
Corporate Administrative Services
1400 N. Goodman Street
P.O. Box 450
Rochester, New York 14692

Dear Mr. Goff:

RE: Bausch & Lomb Worldwide Headquarters

The New York State Department of Environmental Conservation (NYSDEC) is currently conducting an investigation of the former Speedy Cleaners located at 190 Court Street. It has been brought our attention that soil boring data exist for the wintergarden area of the new Bausch & Lomb building. Pursuant to Title 13, Sections 27-1307 and 27-1309 of the Environmental Conservation Law (ECL), I am requesting all soil boring data associated with the Bausch & Lomb Worldwide Headquarters site.

Please provide a written response within ten days of your receipt. If you have any questions I can be contacted at 226-2466. Thank you for your cooperation.

Sincerely,

Todd M. Caffoe
Environmental Engineer I
Division of Hazardous
Waste Remediation

c: M.J. Peachey
J. Hazel

bc: P. Bush
M. O'Toole

1400 N Goodman Street PO Box 450
Rochester NY 14692-0450

716 338 6660
Fax 716 338 8188

James A. Goff
Staff Vice President
Corporate Administrative Services

BAUSCH & LOMB
Healthcare and Optics Worldwide

April 21, 1994

WORLDWIDE SPONSOR OF THE OLYMPIC GAMES

Mr. Todd M. Caffoe
New York State
Department of Environmental Conservation
Division of Hazardous Waste Remediation
6274 East Avon-Lima Road
Avon, New York 14414-9519

Dear Mr. Caffoe:

Enclosed you will find all of the soil boring data that has been collected by Bausch & Lomb associated with our Worldwide Headquarters project. This data was gathered for geotechnical purposes only. The one exception to the geotechnical purposes of the Huntington survey is found in the letter dated 11/15/92 (enclosed). In this letter, they reported three locations where positive readings were obtained using photionization detection. In the sample that had a solvent type odor further lab tests were conducted (enclosed) and all parameters except two were found to be "not detected". The two exceptions, both listed as suspected laboratory background were acetone and methylene chloride.

The testing of the site and surrounding area for environmental purposes was conducted by the city since the entire site belongs to the city. As you and I discussed several days ago, you have already obtained the site information from the city for this parcel so I have not included it in this submission.

The excavation on the building and wintergarden sites is now complete, the building foundation has been poured and the structural steel for the building is complete up to the 8th floor. During the entire excavation process the only discolored (potentially contaminated soils) were found in the south west corner of the building where the building and wintergarden meet and in the wintergarden foundation wall on the western side. In both cases, the soils were removed and properly disposed of. In the case of the wintergarden foundation, the soils were over-excavated then the hole lined with a vapor barrier material prior to the concrete pour. We are also planning to provide a vapor barrier and passive ventilation system for the wintergarden. This plan was reviewed with you on site and at our last meeting with the DEC and the city several months ago.

If you have any questions related to any of the enclosed material, please feel free to call.

Sincerly,

James A. Goff, Vice President
Corporate Administrative Services

g:\data\asadmin\caffoe
file
enclosures

City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of
Environmental Services

Office of the Commissioner
City Hall, Room 300-B
30 Church Street
Rochester, New York 14614-1290

April 18, 1994

Todd Caffoe
Environmental Engineer
New York State Department of Environmental Conservation
6274 E. Avon-Lima Road
Avon, New York 14414

Re: Court Street Parking Garage IRM schedule

Dear Mr. Caffoe:

As we discussed last week, the Phase II excavation activities described in the IRM work plan are being split between the demolition and excavation contractor and the contractor awarded the garage construction contract. Bianchi Trison, the demolition and excavation contractor, will excavate the foot print of the Speedys building to an elevation of 516 feet begining the week of April 24. The 516 foot elevation corresponds to the dense till layer identified in Figure 5 of the work plan and was the final depth of the Phase I excavation between Speedys and the Wintergarden. In order to avoid costly shoring, the deeper excavation to rock beneath the western third of Speedys will be performed by the garage contractor beginning in late May or early June.

The IRM scope of work for the project has not changed, only the timing of the excavation and completion of the soil gas vent system. This change will not affect our ability to comply with the terms of the consent order.

Let me know if you have any questions about this change.

Sincerely,

Mark D. Gregor
Environmental Specialist

xc. R.Elliott
D.Napier
E.Dohery
J.Brennan
N.Burton
S.Feurerstein
D.Zariczny
A.Klumpp
T.Seeler

City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of
Environmental Services

Office of the Commissioner
Division of Environmental Quality
30 Church Street, Rm. 300B
Rochester, New York 14614-1278

May 31, 1994

Todd M. Caffoe
New York State Department of Environmental Conservation
Division of Hazardous Waste Remediation
6274 East Avon-Lima Road
Avon, New York 14414

Re: Bausch and Lomb Site - South East Corner
Winter Garden Area

Dear Todd:

As a result of a conversation we had, research was done for the Winter Garden Area of the Bausch and Lomb Site. This letter summarizes the City's research findings.

The present addresses of the area are 111, 115, 125-141 South Clinton Avenue and 202-224 Court Street; SBL No.'s 121.32-01-04, 5.1, 6, 7, 8, and 22. A copy of the tax map is attached. The range of addresses used for the research was 202-224 Court Street and 63-141 South Clinton Avenue. The scope of the research included a review of plat maps, deed histories, city directories, permit histories taken from the City's building information system, and a request of tank information from the City of Rochester Fire Department.

The only potential environmental concerns noted are:

- 1926 city directory showed a printers shop located on Court Street.
- 1926 and 1934 city directories showed a photography studio, bobbing shope, beauty parlor, barber, and hat cleaners.

No records of underground storage tanks were found. The name of the owner of the hat cleaners was Speedy. Sanbourne maps were reviewed for the purpose of trying to determine where the hat cleaners was located. No information was found to indicate that there is any connection between the hat cleaners and the present Speedy Cleaner's owner.

If you have any questions, or would like additional information, please give me a call.

Sincerely,

Mark D. Gregor
Environmental Specialist

MDG:JAF:jf

attachment

xc: Edward J. Doherty, Commissioner
Judith A. Farrell, Administrative Assistant
Johanna Brennan, Law Department
Dave Harradine, Law Department
Pete vonSchondorf, Seeler Associates

General Testing Corporation

A Full Service Environmental Laboratory

DRAWING FROM PETE

Date: 9/9

Job Number:

TO: Seeler Associates / City of Rochester

ATTENTION: Pete von Schondorf / MerK Gregor

FAX NUMBER: 262-6065, 428-6010 PAGES TO FOLLOW: 2

FROM: Janice Jaeger

INSTRUCTION/MESSAGE:

710 Exchange Street • Rochester, New York 14608 • (716) 454-3760 • Fax (716) 454-1245
85 Trinity Place • Hackensack, NJ 07601 • (201) 488-5242 • Fax (201) 488-6386
435 Lawrence Bell Drive • Amherst, NY 14221 • (716) 634-0454 • Fax (716) 634-9019

General Testing Corporation
710 Exchange St., Rochester, N.Y
(716)454-3760

LABORATORY REPORT-T3

Analysis:
8021-TANK LIST

Analyst: ROD HERRING
Date: 09/08/94
Time: 19:37
Client: SEELER
Job #: R94/03358
Sample#: -001

TP1-(P15)

% SOLID 92.9%

Compound	R.T. Time	Area Units	Conc.	Dil.	Final Conc. (ug/KG)
Methyl t-butyl ether			0.0	1	1.1 U
Benzene			0.00	1	1.1 U
Toluene			0.0	1	1.1 U
Ethylbenzene	28.38	71.4	8.2	1	8.8
p-Xylene			0.0	1	2.2 U
m-Xylene			0.0	1	2.2 U
o-Xylene	30.25	184	20.2	1	22
Isopropylbenzene	31.53	113.0	14.75	1	16
n-Propylbenzene			0.0	1	1.1 U
1,3,5-Trimethylbenzene	33.47	232.0	17.96	1	19
tert-Butylbenzene			0.0	1	1.1 U
1,2,4-Trimethylbenzene	34.63	113	9.70	1	10
sec-Butylbenzene			0.00	1	1.1 U
p-Isopropyltoluene	35.51	55.90	7.2	1	7.8
n-Butylbenzene	36.54	371.0	43.59	1	47
Naphthalene			0.0	1	1.1 U

Total Volatiles 130.76

Surrogate Standards	Reten. Time	Area Units	Total Rec'vry	Amt. Add.	Percent Recovery	Accep. Limits
A,A,A-TRIFLUOROTOLUENE	18.65	99	29.8	30	99	55-131

General Testing Corporation
710 Exchange St., Rochester, N.Y
(716)454-3760

LABORATORY REPORT-T3

Analysis:
8021-TANK LIST

Analyst: ROD HERRING
Date: 09/08/94
Time: 20:41
Client: SEELER
Job #: R94/03358
Sample#: -002

TP2 (P-17)

% SOLID 91.2%

Compound	R.T. Time	Area Units	Conc.	Dil.	Final Conc. (ug/KG)
Methyl t-butyl ether			0.0	500	550 U
Benzene			0.00	500	550 U
Toluene			0.0	500	550 U
Ethylbenzene	28.41	89.0	10.2	500	5600
p-Xylene	28.75	53	5.2	500	2800
m-Xylene			0.0	500	1100 U
o-Xylene	30.27	250	27.4	500	15000
Isopropylbenzene	31.55	172.0	22.46	500	12000
n-Propylbenzene	32.93	237	26.9	500	15000
1,3,5-Trimethylbenzene	33.48	339.0	26.25	500	14000
tert-Butylbenzene			0.0	500	550 U
1,2,4-Trimethylbenzene	34.63	699	60.01	500	33000
sec-Butylbenzene			0.00	500	550 U
p-Isopropyltoluene	35.52	60.50	7.8	500	4300
n-Butylbenzene	36.55	367.0	43.12	500	24000
Naphthalene			0.0	500	550 U

Total Volatiles 125700.00

Surrogate Standards	Reten. Time	Area Units	Total Rec'vry	Amt. Add.	Percent Recovery	Accep. Limits
A,A,A-TRIFLUOROTOLUENE	18.66	102	30.6	30	102	55-131

City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of Environmental Services

Office of the Commissioner
Division of Environmental Quality
30 Church Street, Rm. 300B
Rochester, New York 14614-1278

September 22, 1994

Mary Jane Peachey, P.E.
Division of Hazardous Waste Remediation
New York State Department of Environmental Conservation
6274 E. Avon-Lima Road
Avon, New York 14414

Re: Court Street Parking Garage IRM - Proposed Soil Vent System

Dear Ms. Peachey:

Our September 10 progress report indicated that we would provide a proposed layout and vent system details for the Court Street Garage project. Attached are two copies of the layout and details for the system which includes completed header connnections to previously installed sections between the Wintergarden and Speedy's east foundation wall and also within the footprint of Speedys.

New sections will be installed within the crushed stone drain area around the foundation of the new garage and tunnel and also beneath the bottom floor slab in the northeast area of the garage. For construction purposes and cost reasons, four to five feet of soil will remain in the northeast portion of the garage below the floor slab. Analytical data and a location drawing for samples of the four to five feet of overburden that will remain are attached. Method 8021 soil sample results from Test Pit -2 were in excess of several STAR's clean-up criteria.

I can be reached at 428-5978 if you have any questions or comments. Thank you for your assistance.

Sincerely,

Mark D. Gregor
Environmental Specialist
Division of Environmental Quality

Attach.
xc. R.Elliott,MC-DOH
D.Napier,NYS-DOH
James Hazel,NYS-DEC
E.Doherty
J.Brennan
N.Burton
S.Feuerstein
A.Klumpp
T.Seeler

City of Rochester

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TDD/Voice 232-3260

Department of
Environmental Services

Office of the Commissioner
Division of Environmental Quality
30 Church Street, Rm. 300B
Rochester, New York 14614-1278

October 20, 1994

Mary Jane Peachey, P.E.
New York Department of Environmental Conservation
6274 E. Avon Lima Road
Avon, New York 14414

Re: Court Street Parking Garage IRM Vent System - Work Plan modifications

Dear Ms. Peachey:

On September 22 we sent you proposed additions to the vent system layout for the Court Street Parking Garage Project. As described in our transmittal letter, one proposed section of vent pipe will be installed in an area where contaminated soil will remain below the lower floor slab. When discussing the proposed vent system with Todd Caffoe of your office he pointed out that the proposal to vent soils in this area could be construed as a deviation from our original work plan. This letter is to present our rationale and the need for the section of the system below the floor slab.

The Court Street Parking Garage extends from three levels below grade at South Avenue to two levels below grade at the eastern end where Speedy Cleaners was previously located. Lower level slab elevations increase from west to east. In the western portion of the garage, bedrock was required to be removed while at the east end of the site finish elevations are approximately five feet above rock. The approved work plan indicates that during Phase 2 "the excavation depth will equal what is required for building purposes plus an additional 2 feet of soil. If contaminated soil remains, excavation will continue until bedrock is encountered. In areas not planned for deep excavation, the soil will be removed following the procedures used during Phase I." Phase I procedures called for the removal of soils to the point where contaminant concentrations are below the guidance criteria or to the point where excavations could cause structural instability or are physically limited. Where such project related limitations apply, the work plan requires the use of a soil gas vent system.

Soil gas venting was substituted for excavation to rock on one other occasion during Phase 2 of the IRM. In May, during excavations in the area east of the garage shoring line, soil contaminated above the STAR's criteria was encountered at about the till elevation (515-516 fmsl). Because site access from Stone Street was soon to be eliminated, it was necessary to quickly construct a ramp from Court Street over the area where the contaminated soils remained. At Todd Caffoe's request, an additional one to two feet of contaminated soil was removed. Vent pipe was then installed and the ramp completed. The change in approach allowed the garage construction project to continue with out any effect on the schedule.

We believe our September plan to use soil venting instead of excavation to rock is also appropriate. When preparing the work plan, the excavation depth for the entire garage footprint was assumed to be bedrock or a foot or two above rock. The bottom elevation of the northeast end of the garage is actually several feet above rock. Recently footers were constructed through remaining till in this area. The installation of the footers now complicates soil removal from this area. Also because of the phasing of the garage construction, access to soils close to and beneath the current entrance ramp for verification sampling purposes is not possible until the ramp is removed later in the project. At that time, excavation of the remaining few feet of soil would be made difficult by cumbersome loading operations and reduced access for transport vehicles. The plan to install additional vent pipe instead of removing soils was prepared to address the limited areas of soil contamination where removal operations have become more complicated and costly. The remaining areas of contaminated soil are easily defined and limited both vertically and horizontally. The planned vent system should, therefore, be effective in preventing vapor infiltration into the garage and in reducing soil contaminant levels.

If you would like to discuss the proposed additions to the vent system or the remaining field activities necessary to complete the IRM, please let me know. We will submit the IRM report later this fall after final verification sample data are received.

Sincerely,

Mark D . Gregor
Environmental Specialist
428-5978

xc.
T.Caffoe,NYS-DEC
R.Elliott,MC-DOH
D.Napier,NYS-DOC
James Hazel, NYS-DEC
E.Doherty
J.Brennan
N.Burton
S.Feuerstein
A.Klumpp
T.Seeler

file

New York State Department of Environmental Conservation
Region 8 Office - Division of Hazardous Waste Remediation
6274 East Avon-Lima Road
Avon, New York 14414-9519

Telephone: (716) 226-2466

Langdon Marsh
Commissioner

Peter J. Bush
Regional Director

November 23, 1994

Mr. Mark Gregor, Environmental Specialist
City of Rochester
Department of Environmental Services
30 Church Street
Rochester, NY 14614-1278

Dear Mr. Gregor:

RE: Court Street Parking Garage
IRM Vent System - Work Plan Modifications
Rochester (C), Monroe (C)

Thank you for your October 20, 1994 letter discussing expansion of the soil vent system at the above-referenced site. The Department believes it will be necessary to define the vertical and horizontal extent of contamination and corresponding concentrations in the soil. As agreed, the vent system can be expanded in accordance with the work plan as needed. Should you feel it necessary to expand the vent system outside work plan criteria, it is appropriate to submit such a request in accordance with the effective Order on Consent.

Results of soil sampling conducted on November 7, 1994 will provide data critical to this submittal. Once available, please provide the analytical results, an engineering plan showing where venting is proposed and corresponding contaminant concentration. An explanation and justification for this modification should also be included.

This office understands the various project constraints you are working under. Every attempt will be made to coordinate reviews and respond in a timely manner.

If you have any questions, please do not hesitate to call me.

Very truly yours,

Mary Jane Peachey

Mary Jane Peachey, P.E.
Regional Hazardous Waste Remediation Engineer

rm
cc: D. Napier, NYSDOH J. Hazel, DEE
R. Elliott, MCHD

New York State Department of Environmental Conservation
Region 8 Office - Division of Hazardous Waste Remediation
6274 East Avon-Lima Road
Avon, New York 14414-9519

Telephone: (716) 226-2466

Langdon Marsh
Commissioner

Peter J. Bush
Regional Director

January 5, 1995

Mr. Mark Gregor
City of Rochester
Department of Environmental Services
30 Church Street - Room 300B
Rochester, New York 14614-1278

Dear Mr. Gregor:

RE: Court Street Parking Garage IRM Vent System Piping Layout

Staff at the New York State Department of Environmental Conservation (the Department), the New York State Department of Health, and the Monroe County Health Department have reviewed the December 16, 1994 proposal for the soil venting system piping layout in conjunction with the verification sample data (samples V-1 through V-16). Based upon this review, the vent system proposed is a practical solution which will provide the most environmental benefit within the Phase I area of the excavation. Although the soils located in the area of sample V-11 are contaminated above the STARS criteria, the soils do not exhibit any odors nor is there evidence of seeps or staining. Further, the amount of soil appears relatively small and it is removed from the area of residual contamination. Removal of this soil would be difficult and provide little environmental benefit.

Upon consideration of these factors, the Department accepts the proposed vent system layout. Please submit the detailed drawings and specifications of the entire vent system for review and approval. Thank you for your continued cooperation.

Sincerely,

Todd M. Caffoe, P.E.
Environmental Engineer II
Division of Hazardous
Waste Remediation

c: M.J. Peachey
J. Hazel
D. Napier
R. Elliott

City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of Environmental Services

Office of the Commissioner
Division of Environmental Quality
30 Church Street, Rm. 300B
Rochester, New York 14614-1278

March 20, 1995

Mary Jane Peachey, P.E.
New York Department of Environmental Conservation
6274 E. Avon Lima Road
Avon, New York 14414

Re: Court Street Parking Garage IRM Vent System - Detailed Drawings

Dear Ms. Peachey:

As requested in Todd Caffoe's January 5 letter to me, I am providing proposed final detailed drawings with noted specifications for the Court Street Garage soil vent system. The design has been prepared in accordance with the approved piping system layout.

Enclosed are two copies of the following three draft drawings prepared by Seeler Associates:

1. Soil Gas Ventilation System Layout
2. Layout of Piping and Related Equipment for the Soil Vapor Extraction System (1 0f 2)
3. Electrical Layout for the Soil Vapor Extraction System (2 of 2)

We will provide final sealed drawings after addressing any comments that you may have. Please let me know if you or Todd have any questions. Thank you for your assistance.

Sincerely,

Mark D. Gregor
Environmental Specialist
428-5978

attach.
xc.T.Caffoe,NYS-DEC
R.Elliott,MC-DOH
D.Napier,NYS-DOC
James Hazel, NYS-DEC w/o attach
E.Doherty w/oattach
J.Brennan w/o attach
N.Burton w/o attach
S.Feuerstein
A.Klumpp
T.Seeler
g:\envqual\irmchan2

New York State Department of Environmental Conservation
Region 8 Office - Division of Hazardous Waste Remediation
6274 East Avon-Lima Road
Avon, New York 14414-9519

Telephone: (716) 226-2466

Michael D. Zagata
Commissioner

April 7, 1995

Mr. Mark Gregor
City of Rochester
Department of Environmental Services
30 Church Street - Room 300B
Rochester, New York 14614-1278

Dear Mr. Gregor:

RE: Court Street IRM Soil Venting System Design

The New York State Department of Environmental Conservation (the Department), the New York State Department of Health (NYSDOH), and the Monroe County Health Department (MCHD) have reviewed the referenced document. We have the following comments:

1. The valves located at the manifold are designated as shut-off valves on drawing 1 of 2; however, they are designated as control valves on drawing 4. Please clarify.

2. To enable more control of vapor flow rates and to isolate branches of vent piping, the following recommendations must be addressed:

   a. The branch of piping running to the north side of the parking garage and the branch running to the access tunnel should be separated.

   b. Sampling ports and vacuum gauges should be added to each branch of the vent pipe system. They should be located on the inlet side of the control valves.

3. Once the system has been installed, an operation and maintenance plan must be submitted to the Department.

Please provide a written response and sealed drawings to the Department by **April 21, 1995**. Thank you for your cooperation.

Sincerely,

Todd M. Caffoe

Todd M. Caffoe, P.E.
Environmental Engineer II
Division of Hazardous
Waste Remediation

c: M.J. Peachey
J. Hazel
D. Napier
R. Elliott

City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of Environmental Services

Office of the Commissioner
Division of Environmental Quality
30 Church Street, Rm. 300B
Rochester, New York 14614-1278
Tel.#: (716) 428-6011

May 15, 1995

Todd Caffoe, P.E.
New York State Department of Environmental Conservation
6274 E. Avon-Lima Road
Avon, New York 14414-9519

Re: Court Street IRM Soil Ventilation System Design

Dear Mr. ~~Caffoe~~ TODD:

I apologize for the delay in responding to your April 7, 1995 letter. We have reviewed your comments on our March 20, 1995 soil ventilation system design submittal and prepared the following responses:

Comment 1.
The valves located at the manifold are designated as shut-off valves on drawing 1 of 2; however, they are designated as control valves on drawing 4. Please clarify.

Response:
The valves are ball valves that will be operated to control air flow and optimize system performance. Ball valves will allow continuous flow adjustment from closed to fully open.

Comment 2a
The branch of piping running to the north side of the parking garage and the branch running to the access tunnel should be separated.

Response:
We have determined that given the proximity and nature of the contamination in the lower overburden around the northeast area of the garage, it will generally be necessary to operate the both legs of the garage perimeter ventilation system in the same manner (eg. valve position and vacuum setting). Seeps were observed at locations on both the east and north shoring as well. Although some additional operational flexibility would be gained by such a modification, we believe that the our proposed system layout will be effective.

Comment 2b.
Sampling ports and vacuum gauges should be added to each branch of the vent pipe system. They should be located on the inlet side of the control valves.

Response:
We agree and have prepared an additional drawing detailing the locations for sampling ports and vacuum gauges.

Comment 3.
Once the system has been installed, an operation and maintenance plan must be submitted to the Department.

Response :
An operations and maintenance plan will be prepared and submitted to your office upon installation of the system. Final installations will be completed in the Fall of 1995.

We are enclosing two sets of sealed final drawings with this response. Let me know if you have any additional questions or concerns. Thank you for your cooperation.

Sincerely,

Mark D. Gregor
Environmental Specialist

g:\envqual\irmvent.bk!
attach.
c: M.J.Peachey,NYSDEC w/o attach
J.Hazel,NYSDEC
D.Napier,NYSDOH
R.Elliott,MCDOH
E.Doherty w/o attach
J.Brennan w/o attach
S.Feuerstein
A.Klumpp

New York State Department of Environmental Conservation
Region 8 Office - Division of Hazardous Waste Remediation
6274 East Avon-Lima Road
Avon, New York 14414-9519

Telephone: (716) 226-2466

Michael D. Zagata
Commissioner

May 31, 1995

Mr. Mark Gregor
City of Rochester
Department of Environmental Services
30 Church Street - Room 300B
Rochester, New York 14614-1278

Dear Mr. Gregor:

RE: Court Street IRM Revised Soil Venting System Design

The New York State Department of Environmental Conservation (the Department), the New York State Department of Health (NYSDOH), and the Monroe County Health Department (MCHD) have reviewed the above referenced document. Based upon our review, the soil vent system design is approved. Please send me a revised schedule for installation and startup of the vent system by *June 15, 1995*.

Please feel free to contact me if you have any questions. Thank you for your cooperation.

Sincerely,

Todd M. Caffoe, P.E.
Environmental Engineer II
Division of Hazardous
Waste Remediation

cc: M.J. Peachey
J. Hazel
D. Napier
R. Elliott

file

New York State Department of Environmental Conservation
Region 8 Office - Division of Hazardous Waste Remediation
6274 East Avon-Lima Road
Avon, New York 14414-9519

Telephone: (716) 226-2466

February 20, 1996

Mr. Mark Gregor
City of Rochester
Department of Environmental Services
30 Church Street - Room 300B
Rochester, New York 14614-1278

Dear Mr. Gregor:

RE: Court Street Garage IRM
Soil Vent System Remediation/Cleanup Air Emission Permit Application

I have reviewed the revised annual and short term impact calculations for the referenced site. Based upon the estimated emission rates provided in the revised application, the Ambient Guideline Concentrations (AGCs) listed in Air Guide I (draft 1991) would not be exceeded.

Please provide the basis for the estimated emission rates and a signed copy of the revised application for approval. Thank you for your continued cooperation. Please call me if you have any questions.

Sincerely,

Todd M. Caffoe, P.E.
Environmental Engineer II
Division of Hazardous
Waste Remediation

cc: M.J. Peachey
D. Walsh

Rpt. w/ TODD

City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of Environmental Services

Office of the Commissioner
Division of Environmental Quality
30 Church Street, Rm. 300B
Rochester, New York 14614-1278
Tel.#: (716) 428-6011

February 21, 1996

Mary Jane Peachey, P.E.
Division of Hazardous Waste Remediation
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414

Re: ~~Court Street Parking Garage - Draft IRM Report~~ file

Dear Ms. Peachey:

As required under Section II of the consent order between the City of Rochester, and the New York State Department of Environmental Conservation, we are providing two copies of the draft Interim Remedial Measures Report for your review documenting all activities completed during the IRM program at the Court Street Parking Garage site.

Please feel free to contact me at 428-5978 or Anne Klumpp at 428-7474 should you have any questions. Once you have had an opportunity to review the report we would appreciate an opportunity to meet, possibly sometime between March 6 and 15, to discuss the report and the regulatory status of the site. Thank you for your cooperation and responsiveness on this project.

Sincerely,

Mark D. Gregor, CHMM
Environmental Specialist

Enclosure

c: R. Elliott, MCDOH w/enc
D. Napier, NYSDOH w/enc
James Hazel, NYSDEC w/enc
E. Doherty
J. Brennan w/enc
S. Hauser
P. Comerford
A. Klumpp
T. Seeler

file

New York State Department of Environmental Conservation
Region 8 Office - Division of Hazardous Waste Remediation
6274 East Avon-Lima Road
Avon, New York 14414-9519

Telephone: (716) 226-2466

Michael D. Zagata
Commissioner

Renée Forgensi Davison
Regional Director

April 24, 1996

Mr. Mark Gregor
City of Rochester
Department of Environmental Services
30 Church Street - Room 300B
Rochester, New York 14614-1278

Dear Mr. Gregor:

RE: Interim Remedial Measure (IRM) Report
Court Street Parking Garage Site (February 1996)

The New York State Department of Environmental Conservation (the Department), the New York State Department of Health (NYSDOH), and the Monroe County Health Department (MCHD) have reviewed the referenced document. We have the following comments:

1. Page 2-7 - Was the dense phase liquid bubble analyzed for any other compounds besides perchloroethlyene (PCE)?

2. Pages E-5 and 2-30 - It should be noted in the text that "form oil" was being liberally sprayed on the concrete forms in this area.

3. It was difficult to get an accurate summary of the confirmatory sample results. It would be less confusing if all of the verification samples were on one figure. Samples which exceeded the spill technology and remediation series (STARS) Memo #1 criteria should have the sample results posted on the figure with a notation why they were left in place (i.e. proximity to building).

4. Please include "as-built" drawings for the soil vapor extraction (SVE) system and update the text of Section 3 to reflect that the system is installed.

5. Please provide a revised remediation air emission permit application for the SVE system with an original signature.

6. Operation & Maintenance - Please include an operations & maintenance plan for the SVE system. At a minimum, the plan should include inspection frequencies, sampling frequencies, reporting frequencies, inspection forms, and reporting of equipment malfunctions.

7. Conclusions - Not all of the contaminated soils are being addressed by the SVE system. Data from Bausch & Lomb (B&L) suggest there is residual contamination beneath the winter garden portion of the B&L building. At a minimum, a groundwater investigation should be conducted to determine if there is a contaminant plume.

Please provide a written response by *May 31, 1996*. Thank you for all of your cooperation.

Sincerely,

Todd M. Caffoe, P.E.
Environmental Engineer II
Division of Hazardous
Waste Remediation

cc: M.J. Peachey
J. Ryan
D. Napier
R. Elliott

Seeler Associates
ENVIRONMENTAL CONSULTANTS

July 25, 1996

Mr. Todd Caffoe, P.E.
Hazardous Waste Remediation
Region 8
New York Department of Environmental
Conservation
6274 East Avon-Lima Road
Avon, New York 14414

Re: Court Street Parking Garage

Dear Mr. Caffoe:

Per the instructions of Mr. Mark Gregor from the City of Rochester Department of Environmental Services, Seeler Associates is submitting the Final Report - "Interim Remedial Measure for the Court Street Parking Garage Site." For this submittal we have only provided the report text, Figure 1 and Figures 3 through 15, and Tables 1 through 10. Pockets have also been provided for Figure 2 and the other over-sized drawings included in previous drafts or provided to address your comments.

If you have questions regarding this submittal please call me.

Very truly yours,

SEELER ASSOCIATES

Peter von Schondorf
Senior Scientist

5096PVS
Enclosure

cc: Mark Gregor, City of Rochester

660 REYNOLDS ARCADE • 16 EAST MAIN STREET • ROCHESTER, NY 14614
716•262•6070 • FAX 262•6065

Seeler Associates
ENVIRONMENTAL CONSULTANTS

August 2, 1996

Mr. Todd Caffoe, P.E.
Hazardous Waste Remediation
Region 8
New York Department of Environmental
Conservation
6274 East Avon-Lima Road
Avon, New York 14414

Re: Court Street Parking Garage

Dear Mr. Caffoe:

Per the instructions of Mr. Mark Gregor from the City of Rochester Department of Environmental Services, Seeler Associates is submitting the Final Report - "Interim Remedial Measure for the Court Street Parking Garage Site." For this submittal we have only provided the report text, Figure 1 and Figures 3 through 15, and Tables 1 through 10. Pockets have also been provided for Figure 2 and the other over-sized drawings included in previous drafts or provided to address your comments. Additionally, since the appendices submitted with the Draft Report have not been revised, they should be kept with this submittal and be part of the final document package.

If you have questions regarding this submittal please call me.

Very truly yours,

SEELER ASSOCIATES

Peter von Schondorf
Senior Scientist

5096PVS
Enclosure

cc: Mark Gregor, City of Rochester

660 REYNOLDS ARCADE • 16 EAST MAIN STREET • ROCHESTER, NY 14614
716•262•6070 • FAX 262•6065

File

City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of Environmental Services

Office of the Commissioner
Division of Environmental Quality
30 Church Street, Rm. 300B
Rochester, New York 14614-1278
Tel.#: (716) 428-6011

September 6, 1996

Todd Caffoe, P.E.
Division of Environmental Remediation
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9519

Re: Interim Remedial Measure (IRM)
Soil Vapor Extraction System Operations and Maintenance Manual

Dear Mr. Caffoe:

Enclosed are two copies of the City's operations and maintenance manual for the soil ventilation system at the new Court Street Parking Garage. The manual prepared by MARCOR was developed in accordance with requirements in your April 24, 1996 letter to me. We are ready to begin full time operation and testing of the system as soon as you let us know that the manual is acceptable.

If you have any questions about the manual, please let me know or contact Jane Haag at MARCOR (247-6955 - ext 212). Thank you for your assistance in bringing this project to closure.

Sincerely,

Mark D. Gregor, CHMM
Manager, Division of Environmental Quality

enc.

c: E.Doherty
R.Elliott,MCDOH w/enc
D.Napier,NYSDOH w/enc
M.J.Peachey
J.Ryan
S.Hauser
J.Brennan
P.Comerford

New York State Department of Environmental Conservation
Region 8 Office - Division of Environmental Remediation
6274 East Avon-Lima Road
Avon, New York 14414-9519

Telephone: (716) 226-2466

Michael D. Zagata
Commissioner

October 24, 1996

Mr. Mark Gregor
City of Rochester
Department of Environmental Services
30 Church Street - Room 300B
Rochester, New York 14614-1278

Dear Mr. Gregor:

RE: Court Street Garage Operation and Maintenance (O&M) Manual

The New York State Department of Environmental Conservation (the Department), the New York State Department of Health (NYSDOH), and the Monroe County Health Department (MCHD) have reviewed the referenced document. As we previously discussed, approval to operated the soil venting system was granted verbally by this office. The O&M manual is acceptable to the Department provided that copies of the quarterly monitoring reports are sent to this office, the MCHD, and the NYSDOH. Continued operation of the soil venting system is contingent upon the air discharge meeting the Ambient Guideline Concentrations in Air Guide I (1991).

Please call me if you have any questions. Thank you for your continued cooperation.

Sincerely,

Todd M. Caffoe, P.E.
Environmental Engineer II
Division of Hazardous
Waste Remediation

cc: M.J. Peachey
J. Ryan
D. Napier
R. Elliott

New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road, Avon, New York 14414-9519
Phone: (716) 226-2466 • **FAX:** (716) 226-2909
Website: www.dec.state.ny.us

John P. Cahill
Commissioner

November 1, 2000

Frank C. Pavia, Esq.
Boylan, Brown, Code, Vigdor
& Wilson, LLP
2400 Chase Square
Rochester, New York 14604

Dear Mr. Pavia:

RE: City of Rochester vs. Speedy Cleaners, Inc.

This letter will confirm our telephone conversation today whereby you agreed to modify the subpoenas issued to Todd Caffoe and me for the above-referenced case. Mr. Caffoe will appear on November 13, 2000 at 2:00 PM in your office. I will appear on November 13, 2000 at 10:00 AM. This schedule allows me to fulfill a previous commitment. I appreciate your understanding.

Very truly yours,

Mary Jane Peachey/map

Mary Jane Peachey, P.E.
Regional Hazardous Waste Remediation Engineer

MJP:map

cc: T. Caffoe, NYSDEC - Avon
P. D'Amato, NYSDEC - Avon
J. Ryan, NYSDEC - Buffalo

BOYLAN, BROWN,
CODE, VIGDOR & WILSON, LLP
ATTORNEYS AT LAW

Todd
file - Speedy Cleaners
Roch.

December 7, 2000

Jane Cameron, Esq.
New York State Attorney General's Office
107 Delaware Avenue
Buffalo, New York 14202

Karen M. Kammholz, Esq.
City of Rochester Corporation Counsel
City Hall
30 Church Street, Room 400A
Rochester, New York 14614

Re: The City of Rochester v. Speedy Cleaners, Inc., et al.
Index No. 98-CV-6221T

Dear Counselors:

I am writing to confirm that the completion of Mary Jane Peachey's deposition shall occur by telephone on December 21, 2000, commencing at 11:00 a.m. The telephone conference will be commenced by our office at that time. A court reporter will be present in our office to transcribe the deposition testimony. I will shortly forward to each of you and Ms. Peachey copies of the documents to be used during the telephonic portion of the deposition.

If you have any questions, please feel free to contact me.

Very truly yours,

Frank C. Pavia

FCP/dw

cc: Mary Jane Peachey, P.E.
Magistrate Judge William G. Bauer

2400 Chase Square
Rochester, New York 14604

716-232-5300
FAX: 716-232-3528
http://www.boylanbrown.com

New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road, Avon, New York 14414-9519
Phone: (716) 226-5353 • **FAX:** (716) 226-8696
Website: www.dec.state.ny.us

John P. Cahill
Commissioner

January 16, 2001

Mr. Frank Pavia
Boylan, Brown, Code, Vigdor & Wilson, LLP
2400 Chase Square
Rochester, NY 14604

Dear Mr. Pavia:

Re: The City of Rochester v. Speedy Cleaners, et al.

Todd Caffoe and I have reviewed our respectice transcripts and enhanced the lawyer's notes page you provided. Our comments are listed down the right hand side of the lawyer's note page.

Additionally, I would like to note that my comment on page 46, lines 1-3, does not make sense. The term "active soil" is unfamiliar to me and , therefore, do not believe I would have used it. Furthermore, the term "contaminations" is recorded later in that sentence and I believe I would have used the word "contaminants".

If you have any questions please feel free to contact me.

Very Truly Yours,

Mary Jane Peachey

MaryJane Peachey, P.E.
Regional Hazardous Waste Remediation Engineer

cc: Karen Kammholz w/attachment
Jane Cameron w/attachment

LAWYER'S NOTES

PAGE	LINE	Transcript for Ken Joe Pendley
p. 5	13	Interim
p. 5	18	Interim
p. 8	17	investigating
p. 8	23	that
p. 10	14	Engineer
p. 12	3	RCRA
p. 15	15	1994
p. 16	11	focused
p. 18	13	JAMES A. Goff
p. 23	24	Consent Order
p. 25	13	Fashun Ku
p. 27	3	Fashun Ku
p. 34	20	Interim Remedial Measure
p. 35	5	Interim Remedial Measure
p. 36	1	Interim Remedial Measure
p. 36	5, 8	Significant
p. 36	11, 12, 21	Interim Remedial Measure
p. 37	13, 18-19	Interim Remedial Measure
p. 43	8	Interim Remedial Measure
p. 47	4	delete "technology"
~~p. 51~~	~~15, 16~~	

page	line	
p. 4	18	S. Winton Rd
p. 6	15	replace "and" with "in"
p. 7	24	in Avon, New York
p. 22	19	"us", not "use"
p. 24	1	"that" should be "when"
p. 25	10	Osterberg
p. 36	8	"significant, threat", not "signature"
p. 45	10	Part 360
p. 45	23+25	landfill
p. 49	2	Superfund
p. 51	10	"any", not my
p. 51	15, 16	"fact", not fax
p. 53	19	Environmental, not Interim
p. 55	17	Contaminants not contaminate
p. 67	10	deleted "I"
p. 84	14	"We evaluate" it on a site..
p. 91	20	- Basically, the contaminants in soils are theor. removed
p. 91	24	- add volatile - volatile organic compound
p. 92	9	- Basically, the ability of air or water to pass through them.

Transcript for Coffee

p. 61	16	registry
p. 62	3	registry
63	1	TAGMs
p. 64	23	soils
76	4	the
4	19	insert "of" between "guidelines" and "clamp"

RECEIVED

p. 89 line 10 Interim

0

for example, sand is more permeable than clay.

RECEIVED

p. 94 6 "and" should be "is"

City of Rochester

File

FAX (716) 428-6010
TDD/Voice 232-3260

Department of Environmental Services

Office of the Commissioner
Division of Environmental Quality
30 Church Street, Rm 300B
Rochester, New York 14614-1278
Tel#: (716) 428-6011

March 4, 2003

Todd M. Caffoe, P.E.
Environmental Engineer II - Division Environmental Remediation
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9519

Re: Court Street Garage Soil Vapor Extraction System Sample Protocol
Rochester, New York

Dear Mr. Caffoe:

Please find enclosed a graphical representation of detected tetrachloroethene (PCE) and total Volatile Organic Compounds (VOCs) concentration for the above referenced site since system start-up on October 22, 1996. As illustrated by, contaminants have not been detected at concentrations above the respective Air Guide-1 Short-term Guidance Concentration (SGC) and Annual Guidance Concentration (AGC) since system start-up. In addition, no peaks in contaminant concentrations have been recorded since August 17, 1999. Based on this data, the City requests permission to eliminate sampling and laboratory analysis of effluent air samples at the site. System operation and field VOC effluent concentrations will continue to be monitored periodically and any significant changes in VOC levels will be reported to the NYSDEC.

Please feel free to contact me at 428-7892 if you have any questions or comments.

Sincerely,
Division of Environmental Quality

Jane MH Forbes
Environmental Technician

c: Mark Gregor, City of Rochester (w/o enclosures)
Joseph Albert, MCDOH
Dave Napier, NYSDOH

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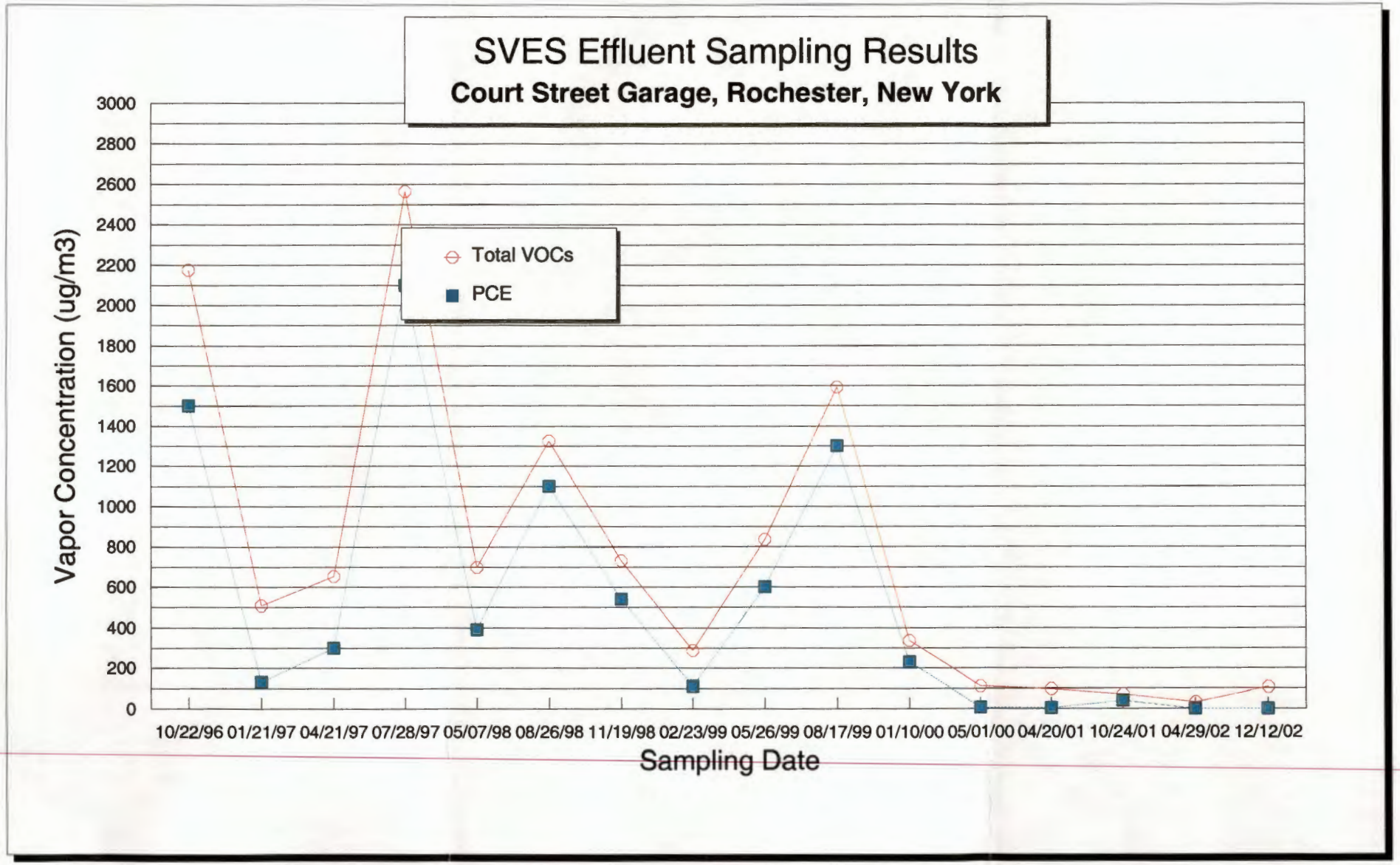
SVES Effluent Sampling Results
Court Street Garage, Rochester, New York
Vapor Concentration (ug/m3)
3000
2800
2600
2400
2200
2000
1800
1600
1400
1200
1000
800
600
400
200
0
Total VOCs
PCE
10/22/96
01/21/97
04/21/97
07/28/97
05/07/98
08/26/98
11/19/98
02/23/99
05/26/99
08/17/99
01/10/00
05/01/00
04/20/01
10/24/01
04/29/02
12/12/02
Sampling Date