



# Site Management Periodic Review Report and IC/EC Certification (2024)

RG&E - Brockport Former MGP Site (NO. V00301)  
Erie and Perry Streets  
Village of Brockport, Monroe County, New York

**Submitted to:**

New York State Department of Environmental Conservation  
Division of Environmental Remediation  
Remedial Bureau C, 11th Floor  
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**On behalf of:**

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January 30, 2025

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## 1. Executive Summary

NEU-VELLE, LLC (NEU-VELLE) conducted the Site Management Periodic Review Report (PRR) and Institutional Control (IC)/Engineering Control (EC) Certification submittal for the Rochester Gas and Electric Corporation (RG&E) - Brockport Former Manufactured Gas Plant (MGP) Site located in the Village of Brockport, Monroe County, New York (Tax Map # 68.51-2-4 and hereinafter referred to as the “Site”, see Figure 1). RG&E entered into a Voluntary Cleanup Agreement (VCA) on December 3, 2001 with the New York State Department of Environmental Conservation (NYSDEC) to remediate the Site (NYSDEC Site No. V00301). The Site is currently governed by the requirements of the NYSDEC-approved Site Management Plan (SMP) dated September 2017.

Figures 1 and 2 from the SMP show the location and boundaries of the Site and are provided as attachments to this PRR. According to the SMP, the following three (3) interim remedial measures (IRMs) were performed by RG&E at the Site, at 128 Erie Street (located adjacent west of the Site and to the west of 118 Erie Street), and at 108 Erie Street (Tax Map # 68.51-2-5, located adjacent southeast of the Site):

- the on-Site IRM was conducted in April 2011 for the purpose of removing impacted soil prior to installation of new gas regulator equipment and gas piping on a portion of the Site known as “Area G”.
- the IRM at 128 Erie Street was completed in May 2006, when approximately six (6) inches of soil was removed from the surface to address the presence of contaminants of interest (COIs) that were attributed to the presence of “coal fines”. The removed surface soil was replaced with imported topsoil and sod.
- the IRM at 108 Erie Street was performed in July 2007 and consisted of the removal of soil containing COIs in the western portion of the 108 Erie Street property, which abuts the Site. The soil removal areas were backfilled with clean, imported soil.

According to the SMP, the remediation of 118 Erie Street (Tax Map # 68.51-2-3, located adjacent to the southwest and west of the Site) and the RG&E property outside of “Area G” was conducted from October 2014 through April 2015. This remedial work included the demolition of the garage and driveway at 118 Erie Street, excavation of soil, backfilling and grading, replacement of the garage and driveway at 118 Erie Street, and final Site restoration.

Some MGP-related residuals were left at the Site, which is hereafter referred to as “remaining MGP contamination”. Imposition of an IC in the form of Deed Restriction has been incorporated into the Site remedy to control exposure to remaining MGP contamination to ensure protection of public health and the environment.

The Site was remediated to address the presence of aromatic volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylene (BTEX) and polyaromatic hydrocarbons (PAHs). The elements of the selected remedy include:

- implementation of the remedial design program;
- maintaining the existing soil cover system;
- imposition of an institutional control in the form of a Deed Restriction, and;

- preparation of a post-remediation SMP.

Following the implementation of the selected remedy, the SMP was implemented (See Section 2).

NEU-VELLE found that each component of the SMP was complied with during this reporting period:

- ICs/ECs have been in place and effective, and
- Inspections were performed as required.

Based upon the inspections and compliance with the SMP, the Site remedy continues to meet the remedial objectives set forth. RG&E will continue to conduct inspections on an annual frequency and perform groundwater monitoring on a semi-annual basis, pending approval to modify the groundwater monitoring program, as proposed in the 2024 Groundwater Sampling Report for the Site, dated January 30, 2025.

## **2. Site Overview**

### **2.1 Site Description**

As shown on Figure 2, the 0.704-acre Site is situated to the northwest of the intersection of Erie and Perry Streets in the Village of Brockport, Monroe County, New York. The Site is abutted by: lands of the New York State Canal Corporation (NYSCC) and the Erie Canal to the north; Erie Street and residential properties to the south; Perry Street and residential properties to the east; and residential properties to the west (see Figure 2, Site Layout).

The Site consists of mostly unimproved, grassy areas, with a gas regulator enclosure and associated gravel pad/driveway on the northeastern portion of the Site.

### **2.2 Remedial Program Summary**

According to the SMP, the following three (3) interim remedial measures (IRMs) were performed by RG&E at the Site, at 128 Erie Street (located adjacent west of the Site and to the west of 118 Erie Street), and at 108 Erie Street (Tax Map # 68.51-2-5, located adjacent southeast of the Site):

- the on-Site IRM was conducted in April 2011 for the purpose of removing impacted soil prior to installation of new gas regulator equipment and gas piping on a portion of the Site known as “Area G”.
- the IRM at 128 Erie Street was completed in May 2006, when approximately six (6) inches of soil was removed from the surface to address the presence of contaminants of interest (COIs) that were attributed to the presence of “coal fines”. The removed surface soil was replaced with imported topsoil and sod.
- the IRM at 108 Erie Street was performed in July 2007 and consisted of the removal of soil containing COIs in the western portion of the 108 Erie Street property which abuts the Site. The soil removal areas were backfilled with clean, imported soil.

According to the SMP, the remediation of 118 Erie Street (Tax Map # 68.51-2-3, located adjacent to the southwest and west of the Site) and the RG&E property outside of “Area G” was conducted from October 2014 through April 2015. This remedial work included the demolition of the garage and driveway at 118 Erie Street, excavation of soil, backfilling and grading, replacement of the garage and driveway at 118 Erie Street, and final Site restoration.

#### **2.2.1 Remaining MGP Contamination**

Work performed off-Site at the 108, 118, and 128 Erie Street properties, which may have been impacted by MGP-related contaminants emanating from the Site, was performed to achieve compliance with Restricted Use-Residential Soil Cleanup Objectives (SCOs), which is consistent with both the three (3) properties’ use and local zoning. Restricted Use-Residential SCOs were achieved at each of these three (3) residential properties.

According to the Decision Document issued by the NYSDEC on March 11, 2014, and the approved Remedial Action Work Plan (RAWP) for the Site, the objective for the soil remediation on the Site was to achieve Restricted Use-Residential SCOs for surface soil, with subsurface soil remediation

to achieve Restricted Use-Commercial SCOs for PAHs by meeting a 500 ppm Total PAH (TPAH) limit. During remediation of the Site, however, the on-Site subsurface soils were also remediated using the Restricted Use-Restricted Residential SCOs as a guide. Clean fill was placed over all areas excavated on-Site and was placed to a minimum depth of two (2) feet below ground surface (bgs) over any subsurface soils that did not meet Restricted Use-Restricted Residential SCOs at the base of the remedial excavation.

During the remedial excavation activities, sidewall and bottom samples were collected for laboratory analysis. Some on-Site subsurface confirmation soil samples exceeded the Unrestricted Use SCOs. Moreover, a few on-Site documentation subsurface samples still exceeded the targeted Restricted Use-Restricted Residential Use SCOs.

Table 3 and Figure 6 of the SMP summarize the results of all confirmation and documentation soil samples collected and show that the Restricted Use-Residential SCOs were achieved at the off-Site residential properties, and that the Restricted Use-Restricted Residential SCOs were achieved in the on-Site surface soils and largely achieved in the on-Site subsurface soils.

On-Site subsurface soil generally met Unrestricted Use SCOs, except for the following three (3) sample locations that were found to have possible Unrestricted Use SCO exceedances for metals only:

- a sidewall sample (“AS-2”) in the western portion of the Site slightly exceeded the Unrestricted Use SCO for zinc (130 mg/Kg);
- a bottom sample (“F-B4”) in the eastern side of the Site may have exceeded the Unrestricted Use SCO for mercury (estimated value of 0.36 mg/Kg); and
- sample “D-B2” slightly exceeded the Unrestricted Use SCO for mercury (0.23 mg/Kg).

Subsurface soils in two (2) small areas on the northern side of the Site exceeded Restricted Use-Restricted Residential SCOs following remediation, apparently due to the presence of historic fill material that could not be removed during remediation. Confirmation sample “D-B1” exceeded the Restricted Use-Restricted Residential SCOs for six (6) PAH compounds.

At the northeastern corner of the Site, a thick deposit of fill could not be removed. Documentation sample “F-B1” had five (5) PAHs exceeding the Unrestricted Use SCOs, and four (4) PAH exceedances were documented at sample location “F-B2”. However, the total PAH concentrations at both sample locations were well below the 500 mg/Kg limit specified in the Decision Document for remediation of the Site (11 and 22 mg/Kg, respectively).

The IRM for “Area G” generally met Restricted Use-Restricted Residential SCOs, with only three (3) bottom samples containing concentrations of PAHs that exceeded the Restricted Use-Restricted Residential SCOs (“BCS 2”, “BCS 9”, and “BCS 13”). All three (3) of these samples were collected from 5 feet bgs. Total PAHs in these samples ranged from 9.7 to 87.0 ppm. One (1) sidewall documentation sample (“SWB 3”) along the eastern side of the Site slightly exceeded the Restricted Use-Restricted Residential SCOs for a single PAH [reported concentration of 1.1 mg/kg versus the SCO of 1.0 for benzo(b)fluoranthene].

A portion of the MGP impacts left via historic MGP processes on the off-Site NYSCC property was excavated on behalf of the NYSCC by RG&E, under the terms of an access agreement between the two parties. Due to the poor condition of the concrete retaining wall along the Erie Canal, the soil excavation

was limited by the NYSCC. This excavation was backfilled with clean soil fill, thus providing a clean soil cover over the remaining contaminated soil. Two (2) of the three (3) documentation samples obtained at the base of this excavation, as well as all three (3) sidewall samples, exceeded Unrestricted Use SCOs.

### 2.2.2 Site Management Plan

The SMP, dated September 2017, for the Site provides the following:

- Institutional Controls:
  - Imposition of a Declaration of Covenants and Restrictions (Deed Restriction) that will:
    - Restrict use of the real property comprising the Site to: Restricted Residential use as described in 6 NYCRR Part 375-1.8(g)(2)(ii), and provided such use is consistent with local zoning; or Commercial use as described in 6 NYCRR Part 375-1.8(g)(2)(iii); and/or Industrial use as described in 6 NYCRR Part 375-1.8(g)(2)(iv).
    - The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH or the Monroe County Department of Health to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department.
    - Require inspection of Engineering Controls at the frequency and as described in the SMP.
    - Require periodic certification of institutional and engineering controls.
    - Require compliance with the SMP.
    - Access to the Site is provided to agents, employees, or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the Deed Restrictions.
    - Require that the potential for vapor intrusion must be evaluated for any buildings developed in the area impacted by the plume of remaining contaminants in groundwater and within the IC boundaries noted on Figure 6 of the SMP, and any potential impacts that are identified must be monitored or mitigated.
    - Prohibit vegetable gardens and farming on the Site.
- Engineering Controls:
  - Maintain the existing soil cover system, including use of the Excavation Work Plan (EWP) provided in Appendix B of the SMP, which outlines the procedures required to be implemented in the event the soil cover system is breached, penetrated, or temporarily removed, and any underlying remaining contamination is disturbed.
- Site Inspections:
  - Annual Site Inspection
  - Given the remaining residual MGP impacts on the upgradient NYSCC property, RG&E has volunteered to report to NYSDEC and the NYSCC on observable conditions at the time of its on-Site inspection on the adjacent NYSCC property, canal wall and canal bed



using the form for the canal property attached in Appendix H of the SMP. RG&E will observe to the extent practicable the following:

- Visual observation of the soil cover placed on the NYSCC property.
  - Visual observation will be made on the face and at the base of the concrete canal retaining wall on the canal (water) side of the wall, to assess whether seeps or tar deposits are present.
  - A copy of the 2024 report documenting the visual inspection of the adjacent NYSCC property, canal wall, and canal bed is included as Appendix A of this PRR.
- Monitoring and Sampling:
    - The following eleven (11) groundwater monitoring wells were sampled semi-annually for the first three (3) years (i.e., 2016, 2017, and 2018): MW-6, MW-7, MW-8, MW-12, MW-19, MW-20, MW-21, MW-22, MW-23, MW-24, and MW-25. In addition, the following monitoring wells were gauged only to support the preparation of a water table contour map: MW-11, MW-14, MW-15, MW-17, PZ-2, and PZ-3.
    - Based upon the findings of the above sampling and as detailed in the *Report – 6<sup>th</sup> Post Remediation Groundwater Sampling Event, September 2018*, prepared by NEU-VELLE and dated December 12, 2018, a reduction in the number of groundwater monitoring wells to be sampled was approved by the NYSDEC. Since that time, the following eight (8) groundwater monitoring wells have been sampled on a semi-annual basis: MW-6, MW-8, MW-17, MW-20, MW-21, MW-22, MW-24, and MW-25. In addition, the following monitoring wells were gauged only to support the preparation of a water table contour map: MW-7, MW-11, MW-12, MW-14, MW-15, MW-19, MW-23, PZ-2, and PZ-3.
  - Maintenance:
    - As required based upon Site inspections.
  - Reporting:
    - Periodic Review Report (PRR) – submitted annually to NYSDEC beginning sixteen (16) months after the Certificate of Completion is issued.

### 3. **Remedy Performance Evaluation**

The remedial performance is evaluated based on the periodic visual inspection of the Site's existing soil cover system and condition of the groundwater monitoring wells.

The annual inspection of the Site's soil cover system was performed by NEU-VELLE, on April 16, 2024, to monitor its effectiveness at maintaining physical separation of the remaining subsurface contamination at the Site. The evaluation included a visual inspection of the vegetative, concrete, and/or asphalt cover for evidence of disturbance, erosion or removal of cover materials, settlement, or other pathways that could potentially result in exposure to subsurface MGP residuals. The Site's existing soil cover system was observed to be in satisfactory condition at the time of the inspection.

A copy of the *2024 Annual Site-Wide Inspection Report*, dated June 27, 2024, is included as Appendix B and contains photographs taken during the April 16, 2024, inspection and a completed SMP Site Inspection Form.

The SMP also requires a Monitoring and Sampling Plan for evaluating the effectiveness of the remedy at reducing dissolved MGP-related COIs at the Site. Groundwater sampling for chemical and physical analysis is performed semi-annually to determine if the remedial action objectives are being achieved. Two (2) groundwater sampling events (the 17<sup>th</sup> and 18<sup>th</sup> Post-Remediation Sampling Events, April 2024 and October 2024, respectively) were performed during the reporting period (January 1, 2024 to January 1, 2025) and reports for these groundwater sampling events have been submitted to the NYSDEC under separate cover. Laboratory analytical reports for these sampling events are contained in each groundwater sampling report. A summary of the 2024 groundwater monitoring activities is provided below, and summary tables of the analytical results compared to standards are provided attached to this report.

In April 2024 and October 2024, groundwater samples were collected for laboratory analysis from the following eight (8) groundwater monitoring wells:

- MW6, MW22, MW24, and MW25, where benzene, toluene, ethylbenzene, and xylene (BTEX), polycyclic aromatic hydrocarbons (PAHs), and/or cyanide have historically been detected at concentrations above their respective NYSDEC Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1, Class GA, standards, criteria, and guidance values (SCGs); and
- MW8, MW17, MW20, and MW21, which are located adjacent to the previously noted wells.

Groundwater samples were collected using low-flow purging techniques and submitted under appropriate chain of custody protocols to ALS Environmental (ALS) for the April sampling event and Paradigm Environmental Services, Inc. (Paradigm) for the October sampling event. The groundwater samples were analyzed for:

- volatile organic compounds (VOCs), BTEX only, in accordance with USEPA Method 8260C,
- semi-volatile organic compounds (SVOCs), PAHs only, in accordance with USEPA Method 8270D, and
- total cyanide in accordance with USEPA Method 9012.

The findings of the 17<sup>th</sup> (April 2024) and 18<sup>th</sup> (October 2024) post-remediation groundwater sampling events were similar to those of prior sampling events. That is to say that the overall downgradient distribution of impacts seems to vary based on whether the canal is filled or drained. During high-water conditions, water flows out of the canal, through the impacted soils on the NYSCC property, and onto the Site, with a groundwater flow direction predominantly to the south and southwest. When the canal is drained, the water table along the canal is lower, and flow through the impacted canal soils is predominantly to the west-southwest. This likely explains the seasonal variability of BTEX and PAHs detected in the monitoring wells located on the northern side of the Site (e.g., monitoring wells MW24 and MW25).

The exceedances of the TOGS 1.1.1 Class GA SCGs for BTEX compounds reported in the groundwater samples collected from MW24 and naphthalene in MW25 during the most recent monitoring events, as well as prior sampling events, are likely due to the presence of residual tar and tar-like material (TLM) in the remaining subsurface soil along the upgradient side of the Site on the NYSCC property (which could not be removed during remediation, as directed by the NYSCC). Similarly, the elevated concentrations of cyanide reported in the groundwater samples that have been collected from MW6 may also be attributable to remaining MGP impacts in the subsurface soil at the Site.

Given the consistent exceedances of BTEX compounds in monitoring wells MW24 and MW25 during the post-remediation groundwater sampling events, RG&E is consulting with REGENESIS® regarding product selection and feasibility of in-situ injections to address the remaining source material adjacent to the canal bed that was not removed as part of the remedial action.

Time series plots of the COI concentrations, depicting contaminant concentration trends over time for select groundwater monitoring wells, are provided as Appendix C.

In accordance with the SMP, the frequency of groundwater monitoring will continue as described in the SMP's Table 4 – Post-Remediation Groundwater Sampling Requirements and Schedule. The frequency of groundwater monitoring will only be modified with approval of the NYSDEC. The latest three-year monitoring period (2022 – 2024) prescribed for the Site has concluded with the October 2024 groundwater sampling event, and RG&E has proposed continued groundwater monitoring of the four (4) monitoring wells (MW6, MW22, MW24, and MW25) closest to the remaining contamination on an annual basis (spring) for a three-year period starting in the spring

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of 2025 and ending in the spring of 2027. This proposed modification to the groundwater monitoring plan is pending approval by the NYSDEC.

## **4. IC/EC Plan Compliance**

### **4.1 IC/EC Requirements**

ICs include the following:

- Restrict use of the real property comprising the Site to: Restricted Residential use as described in 6 NYCRR Part 375-1.8(g)(2)(ii), and provided such use is consistent with local zoning; or Commercial use as described in 6 NYCRR Part 375-1.8(g)(2)(iii); and/or Industrial use as described in 6 NYCRR Part 375-1.8(g)(2)(iv);
- The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH or the Monroe County Department of Health to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department;
- The soil cover system/materials at the Site will be periodically inspected and maintained;
- Groundwater and other environmental or public health monitoring must be performed as defined in the SMP;
- Data and information pertinent to Site management must be reported at the frequency and in a manner as defined in the SMP;
- All future activities that will disturb remaining MGP contaminated material must be conducted in accordance with the SMP;
- Monitoring to assess the effectiveness of the remedy must be performed as defined in the SMP;
- Operation, maintenance, monitoring, inspection, and reporting of the physical components of the remedy shall be performed as defined in the SMP;
- Access to the Site must be provided to agents, employees, or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the Deed Restriction;
- The potential for vapor intrusion by residual MGP contamination must be evaluated for any buildings developed on the Site within the IC boundaries noted on Figure 6, and any potential impacts that are identified must be monitored or mitigated; and
- Vegetable gardens and farming on the Site are prohibited.

The Site EC is soil cover system as described in Section 3 and in the SMP. The soil cover system will be maintained to eliminate potential exposure to remaining MGP contamination at the Site.

#### **4.2 IC/EC Compliance**

The NYSDEC-approved SMP is in place. All required inspections were performed in accordance with the SMP. All Site restrictions have been complied with during this reporting period.

#### **4.3 IC/EC Certification**

The completed IC/EC Certification Form is included as Appendix D.

## **5. Inspection Plan Compliance**

### **5.1 Inspection Requirements**

The inspection requirements as specified in the SMP are presented in Section 3.

### **5.2 Inspection Compliance**

The inspections were conducted in accordance with the SMP.

## **6. Conclusions and Recommendations**

Each component of the SMP was complied with:

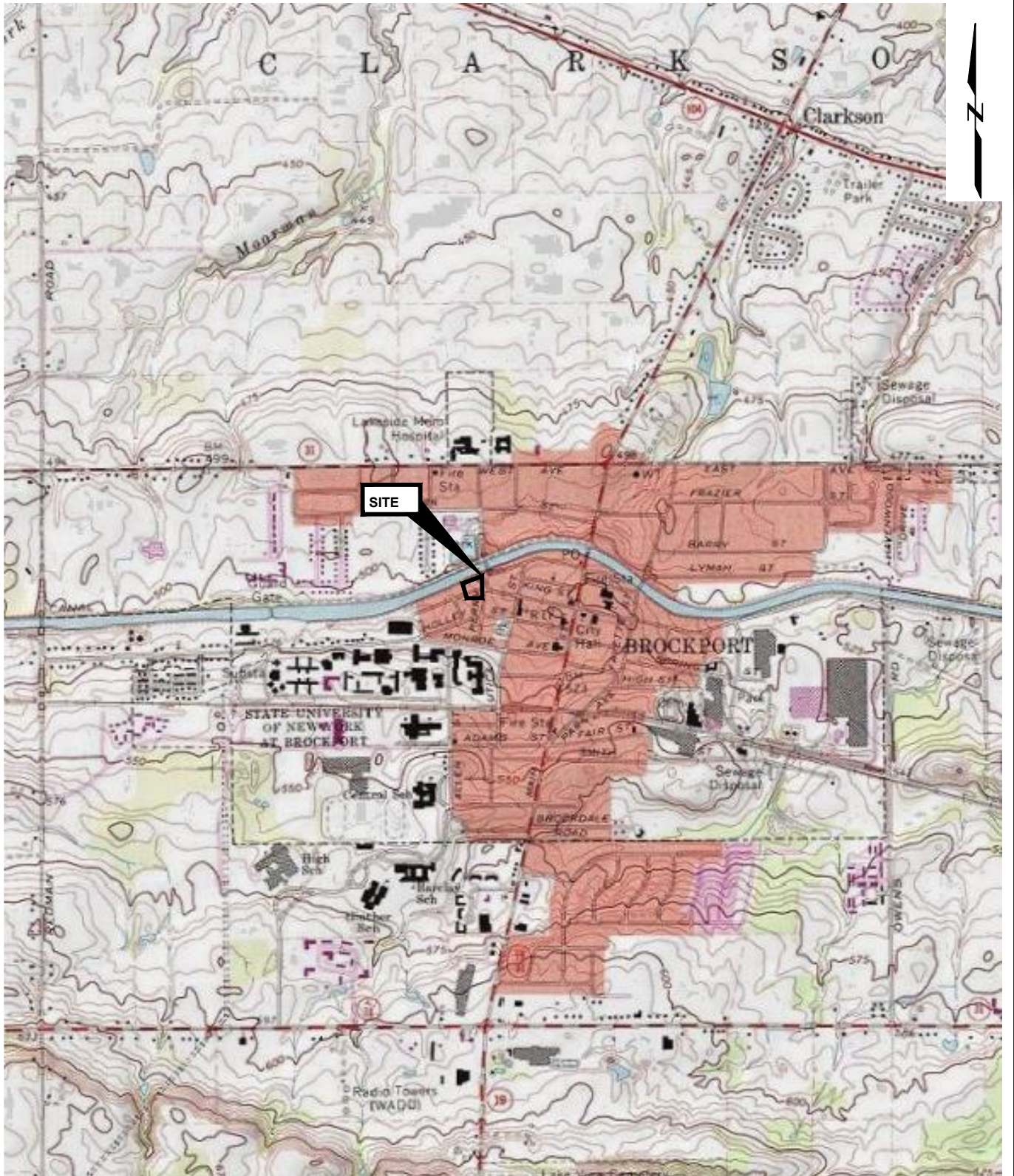
- ICs/ECs have been in place and effective, and
- Inspections were performed as required.

Based upon the inspections and compliance with the SMP, the Site remedy continues to meet the remedial objectives set forth. RG&E will continue to conduct inspections on an annual frequency and groundwater monitoring on a semi-annual basis, pending approval to modify the groundwater monitoring program, as proposed in the 2024 Groundwater Sampling Report for the Site, dated January 30, 2025.

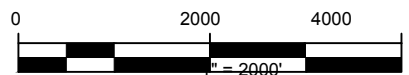


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**Figures**



SOURCE: Map created with TOPO! © 2001 National Geographic  
 (www.nationalgeographic.com/topo)



Site Management Plan  
 Erie and Perry Streets Former MGP  
 Brockport, New York

RG&E  
 Rochester, New York

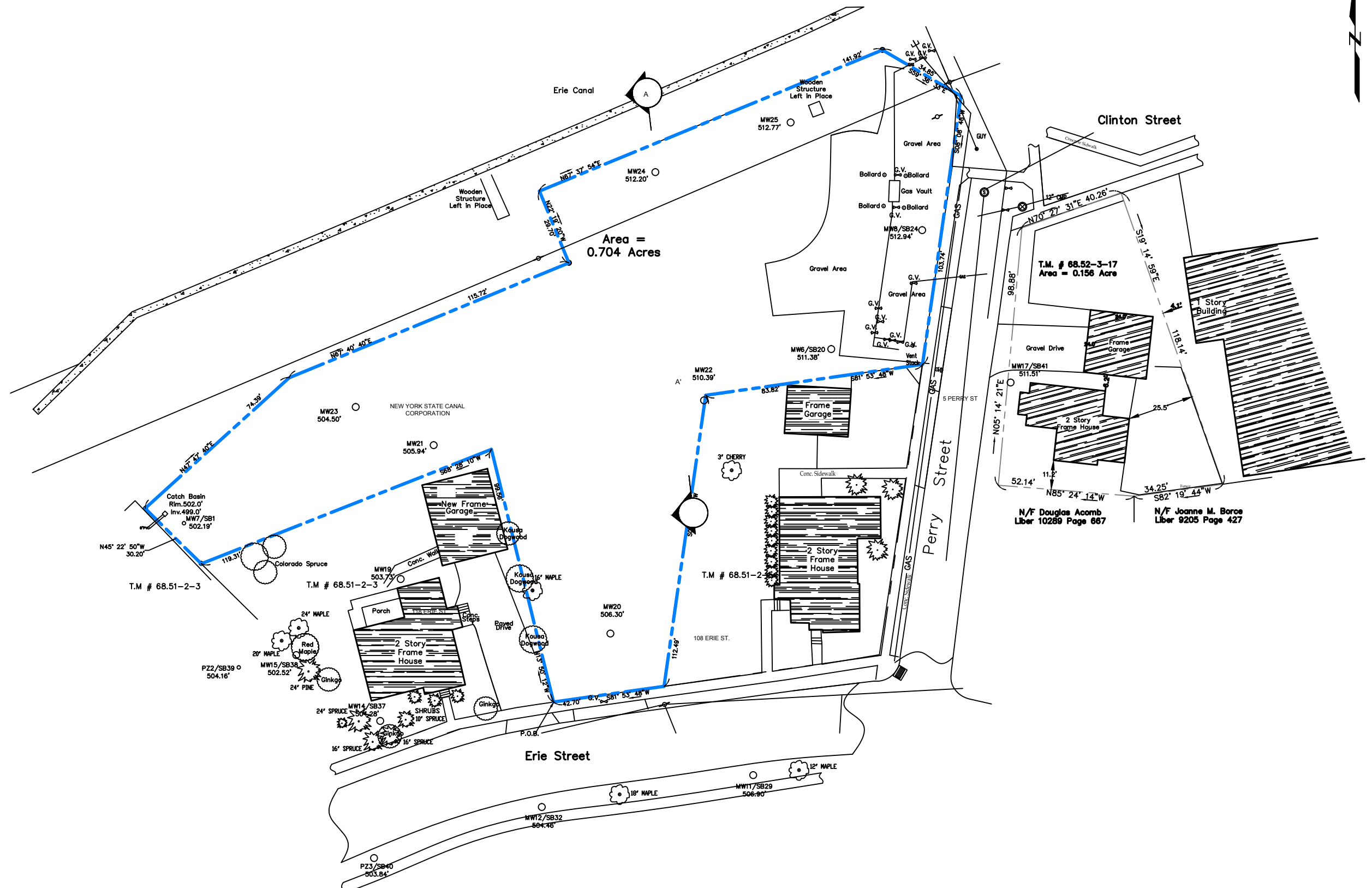


Project 1410470


September 2017

Fig. 1

- LEGEND:**
- 103 SURVEY POINT
  - IRON PIN OR PIPE FOUND
  - IRON PIN SET
  - MONITORING WELL
  - UTILITY POLE
  - P.K. NAIL FOUND
  - P.K. NAIL SET
  - CONCRETE MONUMENT
  - BENCHMARK
  - UTILITY LINES
  - ROW LINE
  - PROPERTY LINES
- E/T



- SOURCES:**
1. PLAN BASED ON SURVEY PREPARED BY VENEZIA LAND SURVEYORS AND CIVIL ENGINEERS TITLED, "SHOWING LAND AT PERRY STREET, VILLAGE OF BROCKPORT, CONTY OF MONROE, STATE OF NEW YORK, DATED MARCH 29, 2016.
  2. BASE MAP FROM POPLI DESIGN GROUP DRAWING TITLED "TOPOGRAPHIC MAP (BOUNDARY PREPARED BY OTHERS) RG&E PROPERTY 1170 AT ERIE & PERRY STREETS, VILLAGE OF BROCKPORT, COUNTY OF MONROE, STATE OF NEW YORK" DATED DECEMBER 19, 2011.

Site Management Plan Erie and Perry Streets Former MGP Brockport, New York RG&E Rochester, New York	 <b>GEI</b> Consultants	Project 1410470 September 2017	Fig. 2
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**Tables**





Table 1  
Rochester Gas & Electric - Brockport, NY  
NYSDEC Site No. V00301-8  
Groundwater Sample Analytical Results

Sample Location Sample Date Sample Identification				MW17 4/25/2019 MW-17	MW17 10/14/2019 MW-17	MW17 4/6/2020 BPT-MW17-04062020	MW17 10/5/2020 BPT-MW17-10052020	MW17 4/13/2021 BPT-MW17-041321	MW17 10/2/2021 BPT-MW17-100221	MW17 4/28/2022 BPT-MW17-042822	MW17 10/20/2022 BPT-MW17-102022	MW17 4/14/2023 BPT-MW17-041423	MW17 10/24/2023 BPT-MW17-102423	MW17 4/15/2024 BPT-MW17-041524	MW17 10/15/2024 BPT-MW17-101524													
Analyte	Cas No.	TOGS 1.1.1 Groundwater SCG	Units	Result	Reporting Limit	Result	Reporting Limit	Result	Reporting Limit	Result	Reporting Limit	Result	Reporting Limit	Result	Reporting Limit	Result	Reporting Limit	Result	Reporting Limit	Result	Reporting Limit	Result	Reporting Limit	Result	Reporting Limit			
<b>BTEX</b>																												
Benzene	71-43-2	1	µg/L	ND	1.00	ND	1.00	ND	1.00	ND	1.00	ND	1.00	ND	1.00	ND	1.00	ND	1.00	ND	5.0	ND	1.00	ND	5.0	ND	1.00	
Toluene	108-88-3	5	µg/L	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	5.0	ND	2.00	ND	5.0	ND	1.00	
Ethylbenzene	100-41-4	5	µg/L	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	5.0	ND	2.00	ND	5.0	ND	1.00	
m,p-Xylene	1330-20-7	5	µg/L	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	5.0	ND	2.00	ND	5.0	ND	2.00	
o-Xylene			µg/L	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	5.0	ND	2.00	ND	5.0	ND	1.00	
<b>PAHs</b>																												
Acenaphthene	83-32-9	20	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
Acenaphthylene	208-96-8	NS	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
Anthracene	120-12-7	50	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
Benzo(a)anthracene	56-55-3	0.002	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
Benzo(a)pyrene	50-32-8	ND	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
Benzo(b)fluoranthene	205-99-2	0.002	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
Benzo(g,h,i)perylene	191-24-2	NS	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
Benzo(k)fluoranthene	207-08-9	0.002	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
Dibenzo(a,h)anthracene	53-70-3	NS	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
Chrysene	218-01-9	0.002	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
Fluoranthene	206-44-0	50	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
Fluorene	86-73-7	50	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
Indeno(1,2,3-cd)pyrene	193-39-5	0.002	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
Naphthalene	91-20-3	10	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
Phenanthrene	85-01-8	50	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
Pyrene	129-00-0	50	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	1.9	ND	10.0	ND	0.20	ND	10.0	ND	9.60	ND	12.5	
<b>Cyanide</b>																												
Cyanide, Total	NA	0.2	mg/L	ND	0.0100	ND	0.0100	ND	0.0100	ND	0.0100	ND	0.0100	ND	0.0100	ND	0.005	ND	0.010	ND	0.010	ND	S	0.010	ND	0.005	ND	0.010

- Notes:**
1. µg/L = micrograms per liter
  2. mg/L = milligrams per liter
  3. NT = not tested, NS = No standard, and ND = non-detect
  4. Division of Water Technical and Operational Guidance Series (TOGS) (1.1.1) Ambient Water Quality Standards and Groundwater Effluent Limitations, June 1998.
  5. **Bold Sample result** = compound was detected.
  6. **Gray shading indicates the sample result is above the**
  7. J is a laboratory data qualifier indicating "Result estimated between the quantitation limit and half the quantitation limit."
  8. M is a laboratory data qualifier indicating "Matrix spike recoveries outside QC limits. Matrix bias indicated."
  9. S is a laboratory data qualifier indicating "Spike Recovery outside accepted recovery limits"

Table 1  
 Rochester Gas & Electric - Brockport, NY  
 NYSDEC Site No. V00301-8  
 Groundwater Sample Analytical Results

Sample Location Sample Date Sample Identification				MW20 4/7/2016 RGE-MW20	MW20 8/3/2016 RGE-MW20	MW20 4/18/2017 RGE-MW-20	MW20 10/17/2017 MW20	MW20 4/10/2018 MW20	MW20 9/19/2018 MW20	MW20 4/25/2019 MW20	MW20 10/10/2019 MW-20	MW20 4/4/2020 BPT-MW20-04042020	MW20 10/2/2020 BPT-MW20-10022020	MW20 (DUPLICATE) BPT-DUP-10022020	MW20 4/13/2021 BPT-MW20-041321	MW20 9/30/2021 BPT-MW20-093021	MW20 4/30/2022 BPT-MW20-043022													
Analyte	Cas No.	TOGS 1.1.1 Groundwater SCG	Units	Result	Reporting Limit	Result	Reporting Limit	Result	Reporting Limit	Result	Reporting Limit	Result	Reporting Limit	Result	Reporting Limit	Result	Reporting Limit													
<b>BTEX</b>																														
Benzene	71-43-2	1	µg/L	ND	1.00	ND	1.00	ND	1.00	ND	1.00	ND	1.00	ND	1.00	ND	1.00													
Toluene	108-88-3	5	µg/L	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00													
Ethylbenzene	100-41-4	5	µg/L	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00													
m,p-Xylene	1330-20-7	5	µg/L	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00													
o-Xylene			µg/L	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00	ND	2.00													
<b>PAHs</b>																														
Acenaphthene	83-32-9	20	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
Acenaphthylene	208-96-8	NS	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
Anthracene	120-12-7	50	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
Benzo(a)anthracene	56-55-3	0.002	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
Benzo(a)pyrene	50-32-8	ND	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
Benzo(b)fluoranthene	205-99-2	0.002	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
Benzo(g,h,i)perylene	191-24-2	NS	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
Benzo(k)fluoranthene	207-08-9	0.002	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
Dibenzo(a,h)anthracene	53-70-3	NS	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
Chrysene	218-01-9	0.002	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
Fluoranthene	206-44-0	50	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
Fluorene	86-73-7	50	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
Indeno(1,2,3-cd) pyrene	193-39-5	0.002	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
2-methylnaphthalene	91-57-6	NS	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
Naphthalene	91-20-3	10	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
Phenanthrene	85-01-8	50	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
Pyrene	129-00-0	50	µg/L	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0	ND	10.0													
<b>Cyanide</b>																														
Cyanide, Total	NA	0.2	mg/L	<b>0.180</b>	0.0100	<b>0.0439</b>	0.0100	<b>0.0456</b>	0.0100	<b>0.0128</b>	0.0100	<b>0.0378</b>	0.0100	ND	0.0100	<b>0.0104</b>	0.0100	ND	0.0100	<b>0.0074</b>	J	0.0100	ND	0.0100	ND	0.0100	<b>0.0171</b>	0.0100	<b>0.006</b>	0.005

Sample Location Sample Date Sample Identification				MW20 10/14/2022 BPT-MW20-101422	MW20 4/18/2023 BPT-MW20-041823	MW20 10/17/2023 BPT-MW20-101723	MW20 (DUPLICATE) BPT-DUP-101723	MW20 4/11/2024 BPT-MW20-041124	MW20 10/16/2024 BPT-MW20-101624								
Analyte	Cas No.	TOGS 1.1.1 Groundwater SCG	Units	Result	Reporting Limit	Result	Reporting Limit	Result	Reporting Limit								
<b>BTEX</b>																	
Benzene	71-43-2	1	µg/L	ND	1.00	ND	1.00	ND	1.00								
Toluene	108-88-3	5	µg/L	ND	2.00	ND	2.00	ND	2.00								
Ethylbenzene	100-41-4	5	µg/L	ND	2.00	ND	2.00	ND	2.00								
m,p-Xylene	1330-20-7	5	µg/L	ND	2.00	ND	2.00	ND	2.00								
o-Xylene			µg/L	ND	2.00	ND	2.00	ND	2.00								
<b>PAHs</b>																	
Acenaphthene	83-32-9	20	µg/L	ND	10.0	ND	10.0	ND	10.0								
Acenaphthylene	208-96-8	NS	µg/L	ND	10.0	ND	10.0	ND	10.0								
Anthracene	120-12-7	50	µg/L	ND	10.0	ND	10.0	ND	10.0								
Benzo(a)anthracene	56-55-3	0.002	µg/L	ND	10.0	ND	10.0	ND	10.0								
Benzo(a)pyrene	50-32-8	ND	µg/L	ND	10.0	ND	10.0	ND	10.0								
Benzo(b)fluoranthene	205-99-2	0.002	µg/L	ND	10.0	ND	10.0	ND	10.0								
Benzo(g,h,i)perylene	191-24-2	NS	µg/L	ND	10.0	ND	10.0	ND	10.0								
Benzo(k)fluoranthene	207-08-9	0.002	µg/L	ND	10.0	ND	10.0	ND	10.0								
Dibenzo(a,h)anthracene	53-70-3	NS	µg/L	ND	10.0	ND	10.0	ND	10.0								
Chrysene	218-01-9	0.002	µg/L	ND	10.0	ND	10.0	ND	10.0								
Fluoranthene	206-44-0	50	µg/L	ND	10.0	ND	10.0	ND	10.0								
Fluorene	86-73-7	50	µg/L	ND	10.0	ND	10.0	ND	10.0								
Indeno(1,2,3-cd) pyrene	193-39-5	0.002	µg/L	ND	10.0	ND	10.0	ND	10.0								
Naphthalene	91-20-3	10	µg/L	ND	10.0	ND	10.0	ND	10.0								
Phenanthrene	85-01-8	50	µg/L	ND	10.0	ND	10.0	ND	10.0								
Pyrene	129-00-0	50	µg/L	ND	10.0	ND	10.0	ND	10.0								
<b>Cyanide</b>																	
Cyanide, Total	NA	0.2	mg/L	<b>0.014</b>	0.010	<b>0.024</b>	0.010	<b>0.012</b>	S	0.010	<b>0.016</b>	S	0.010	<b>0.0168</b>	0.005	<b>0.02</b>	0.010

- Notes:**
- µg/L = micrograms per liter
  - mg/L = milligrams per liter
  - NT = not tested, NS = No standard, and ND = non-detect
  - Division of Water Technical and Operational Guidance Series (TOGS) (1.1.1) Ambient Water Quality Standards and Groundwater Effluent Limitations, June 1998.
  - Bold Sample result** = compound was detected.
  - Gray shading indicates the sample result is above the TOGS 1.1.1 Standards, Criteria and Guidance Value.**
  - J is a laboratory data qualifier indicating "Result estimated between the quantitation limit and half the quantitation limit."
  - M is a laboratory data qualifier indicating "Matrix spike recoveries outside QC limits. Matrix bias indicated."
  - D is a laboratory data qualifier indicating "Sample, Laboratory Control Sample, or Matrix Spike Duplicate results above Relative PercentDifference limit."
  - S is a laboratory data qualifier indicating "Spike Recovery outside accepted recovery limits"













Site Management Periodic Review  
Report and IC/EC Certification (2024)  
RG&E – Brockport Former MGP Site (V00301)  
Village of Brockport, Monroe County, New York  
January 2025

**Appendix A**

**2024 Annual Canal Wall Inspection Report**



June 27, 2024

Mr. Brendan J. Simon, P.E.  
New York State Canal Corporation  
4950 Genesee St, Suite 190  
Cheektowaga, NY 14225

RE: Annual Canal Wall Inspection Report  
RG&E Brockport Former MGP Site  
Corner of Erie and Perry Streets  
Village of Brockport, Monroe County, New York  
NYSDEC Site #V00301-8

Dear Mr. Simon:

On behalf of Rochester Gas and Electric Corporation (RG&E), NEU-VELLE LLC (NEU-VELLE) has completed the annual New York State Canal Corporation (NYSCC) Property Voluntary Inspection, as outlined in the Site Management Plan (SMP) for the Brockport Former Manufactured Gas Plant (MGP) Site.

On April 16, 2024, NEU-VELLE performed a visual inspection for the potential presence of remaining residual MGP impacts on the NYSCC property, canal wall, and canal bed that are situated adjacent to the Brockport Former MGP Site. Visual observations and photographs were collected during this inspection, while the canal was in low-water conditions. No evidence of MGP impacts (e.g., tar seeps or tar deposits) were observed during the inspection, including at the base of the concrete canal retaining wall on the canal (water) side of the wall or in the canal bed. Documentation of NEU-VELLE's inspection is provided in **Attachment A** of this letter report.

Please feel free to contact me at (585) 478-3167, or via email at [lreid@neu-velle.com](mailto:lreid@neu-velle.com) with any questions you may have regarding this report, or contact Mr. Jeremy Wolf, RG&E's Project Manager for the project at (585) 500-8392.

Sincerely,

A handwritten signature in cursive script that reads "Logan Reid".

Logan Reid  
NEU-VELLE, LLC

Attachment A: Site Inspection Form and Photo Log

cc: Mr. Jeremy Wolf (RG&E)  
Mr. Gerald Pratt, P.G. (NYSDEC)  
Mr. Henry Brummer, P.E. (NYSCC)  
Mr. Thomas McDonald, P.E. (NYSCC)

**Attachment A**  
**Site Inspection Form & Photo Log**

**SITE INSPECTION FORM**  
**New York State Canal Corporation Property,**  
**Brockport, NY**

SITE INSPECTION DATE: 4/16/2024 TIME OF ARRIVAL: 12:00

WEATHER: 65-70° F Sunny light breeze  
DEPARTURE: 15:30

Site Inspector(s) and Affiliation: Andrew Rotmfoss - Neu-Velle

INSPECTION TYPE: Annual Inspection or Emergency Inspection

(if an emergency describe the event that required an inspection):

Annual

Are the Institutional Controls in place, performing properly, and remain effective?

Does the Site comply with NYSDEC-approved Site Management Plan? Yes/No/NA

Are there Indications of encroachment onto the site from neighboring properties? Yes/No

Spill associated with MW15, 1-3 ft petroleum inside well

Are there any changes to the site use? Yes/No

Is tar visible at the base of the canal-side of the wall? If so, describe. Yes/No

Is the backfill demarcation indicator, native soil, or any indicators of MGP impact (tar, stained soil) visible on the land-side of the wall? Yes/No



**SITE INSPECTION FORM**  
**New York State Canal Corporation Property,**  
**Brockport, NY**

Is the vegetative cover fully intact over the site soils?  Yes / No Yes/No

Are the Engineering Controls in place, performing properly, and remain effective?

Surface Cover Intact (i.e. no evidence of erosion, excavations)?  Yes / No

**GENERAL SITE OBSERVATIONS:**

Have there been any changes to the property since the last inspection? (changes to the canal wall, site features, etc.) Yes  No

**NOTE: Inspections should be made a minimum once a year and within 5 days of an emergency, such as a natural disaster or an unforeseen failure or damage to the building occurs. Inspections will be conducted by RG&E (or their agent) and results reported to NYSDEC.**

COMPLETED BY: <i>Andrew Rotulus</i>	REVIEWED BY: <i>Albert G. Lyons, Jr.</i>
SIGNATURE: <i>A. Rotulus</i>	SIGNATURE: <i>Albert G. Lyons, Jr.</i>

# Inspection Photographs

New York State Canal Corporation Property  
Brockport Former MGP Site – April 16, 2024

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**East portion of NYS Canal Corporation Wall- Looking southwest**



**Central portion of NYS Canal Corporation Wall- Looking southwest**

# Inspection Photographs

New York State Canal Corporation Property  
Brockport Former MGP Site – April 16, 2024

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Looking west across the upland portion of NYS Canal Corporation property



NYS Canal Corp. Wall Drainage Piping – Looking southwest

# Inspection Photographs

New York State Canal Corporation Property  
Brockport Former MGP Site – April 16, 2024

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Looking east across the upland portion of NYS Canal Corporation property

Site Management Periodic Review  
Report and IC/EC Certification (2024)  
RG&E – Brockport Former MGP Site (V00301)  
Village of Brockport, Monroe County, New York  
January 2025

**Appendix B**  
**2024 Annual Site-wide Inspection Report**



June 27, 2024

Mr. Gerald Pratt, P.G.  
New York State Department of Environmental Conservation  
Division of Environmental Remediation, 12th Floor  
625 Broadway  
Albany, New York 12233-7014

Subject: 2024 Annual Site-Wide Inspection Report  
RG&E Brockport MGP Site  
Village of Brockport, Monroe County, New York  
NYSDEC Site #V00301-8

Dear Mr. Pratt:

On behalf of Rochester Gas and Electric Corporation (RG&E), and in accordance with the requirements of the Site Management Plan (SMP), NEU-VELLE, LLC (NEU-VELLE) has completed the annual Site-Wide Inspection of the Brockport Former Manufactured Gas Plant (MGP) Site, located near the intersection of Erie and Perry Streets in Brockport, New York (the "Site").

The Site-Wide Inspection was performed by NEU-VELLE on April 16, 2024. A completed Site Inspection Form is provided as **Attachment A**. Photographs taken during the Site-Wide Inspection are provided as **Attachment B**. No significant deficiencies were noted during the inspection.

Please feel free to contact me at (585) 478-3167, or via email at [lreid@neu-velle.com](mailto:lreid@neu-velle.com), with any questions you may have regarding this report, or contact Mr. Jeremy Wolf, RG&E's Project Manager for the project at (585) 500-8392.

Sincerely,

A handwritten signature in cursive script that reads "Logan Reid".

Logan Reid  
NEU-VELLE, LLC

Attachment A – 2024 Site Inspection Form

Attachment B – 2024 Site-Wide Inspection Photographs

cc: Mr. Jeremy Wolf, RG&E

**Attachment A**  
**Site Inspection Form**

**SITE INSPECTION FORM**

**Brockport Former Manufactured Gas Plant Site**

SITE INSPECTION DATE: 4/16/2024 TIME OF ARRIVAL: 12:00

DEPARTURE: 15:30

WEATHER: 65-70°F Sunny light breeze

Site Inspector(s) and Affiliation: Andrew Rotoliss - Newville

INSPECTION TYPE: Annual Inspection or Emergency Inspection  
(if an emergency describe the event that required an inspection): Annual

Are the Institutional Controls in place, performing properly, and remain effective?  
Does the Site comply with NYSDEC-approved Site Management Plan? Yes / No

Are there indications of encroachment onto the site from neighboring properties? Yes / No  
MW 15 is associated with a spill resulting in 1-3 ft of petroleum product inside well

Has ownership of the property changed since the last inspection? Yes / No

Are there any changes to the site use (Restricted Residential) that would affect the SMP or Institutional Controls? Yes / No

Is site used for agricultural purpose or vegetable gardens? Yes / No

Is groundwater used as source of potable or process water onsite? Yes / No

If yes to the above – does water go through the necessary water quality treatment? Yes/No



# SITE INSPECTION FORM

## Brockport Former Manufactured Gas Plant Site

Is the soil demarcation indicator, native soil, or any indicators of MGP impact (tar, stained soil) visible?

Yes/No  No

Is the vegetative cover fully intact over the site soils?  Yes/ No

Yes/No

Are the Engineering Controls in place, performing properly, and remain effective?

Surface Cover Intact (i.e. no evidence of erosion, excavations)?

Yes/ No

### GENERAL SITE OBSERVATIONS:

Have there been any changes to the property since the last inspection? (e.g. new natural gas Regulator equipment or facilities, changes in site topography, erosion, vegetative cover, etc.)

NO Changes to the site

**NOTE:** Inspections should be made a minimum once a year and within 5 days of an emergency, such as a natural disaster or an unforeseen failure or damage to the building occurs. Inspections will be conducted by RG&E (or their agent) and results reported to NYSDEC.

COMPLETED BY: Andrew Potyuss

REVIEWED BY: Albert G. Lyons, Jr.

SIGNATURE:

*A. Potyuss*

SIGNATURE

*Albert G. Lyons, Jr.*

# **Attachment B**

## **Site Photographs**

# Annual Site-Wide Inspection Photographs

## Brockport Former MGP Site - April 16, 2024

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**Photo 1 – Looking northwest at the northwestern portion of the Site.**



**Photo 2 – Looking east across the northern portion of the Site and the northerly adjacent NYS Canal Corporation property.**

# Annual Site-Wide Inspection Photographs

## Brockport Former MGP Site - April 16, 2024

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**Photo 3 – Looking south across the central portion of the Site.**



**Photo 4 – Looking east across the Site.**

# Annual Site-Wide Inspection Photographs

## Brockport Former MGP Site - April 16, 2024

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**Photo 5 – Looking southeast across the central portion of the Site.**



**Photo 6 – Looking southwest across the Site.**

# Annual Site-Wide Inspection Photographs

## Brockport Former MGP Site - April 16, 2024

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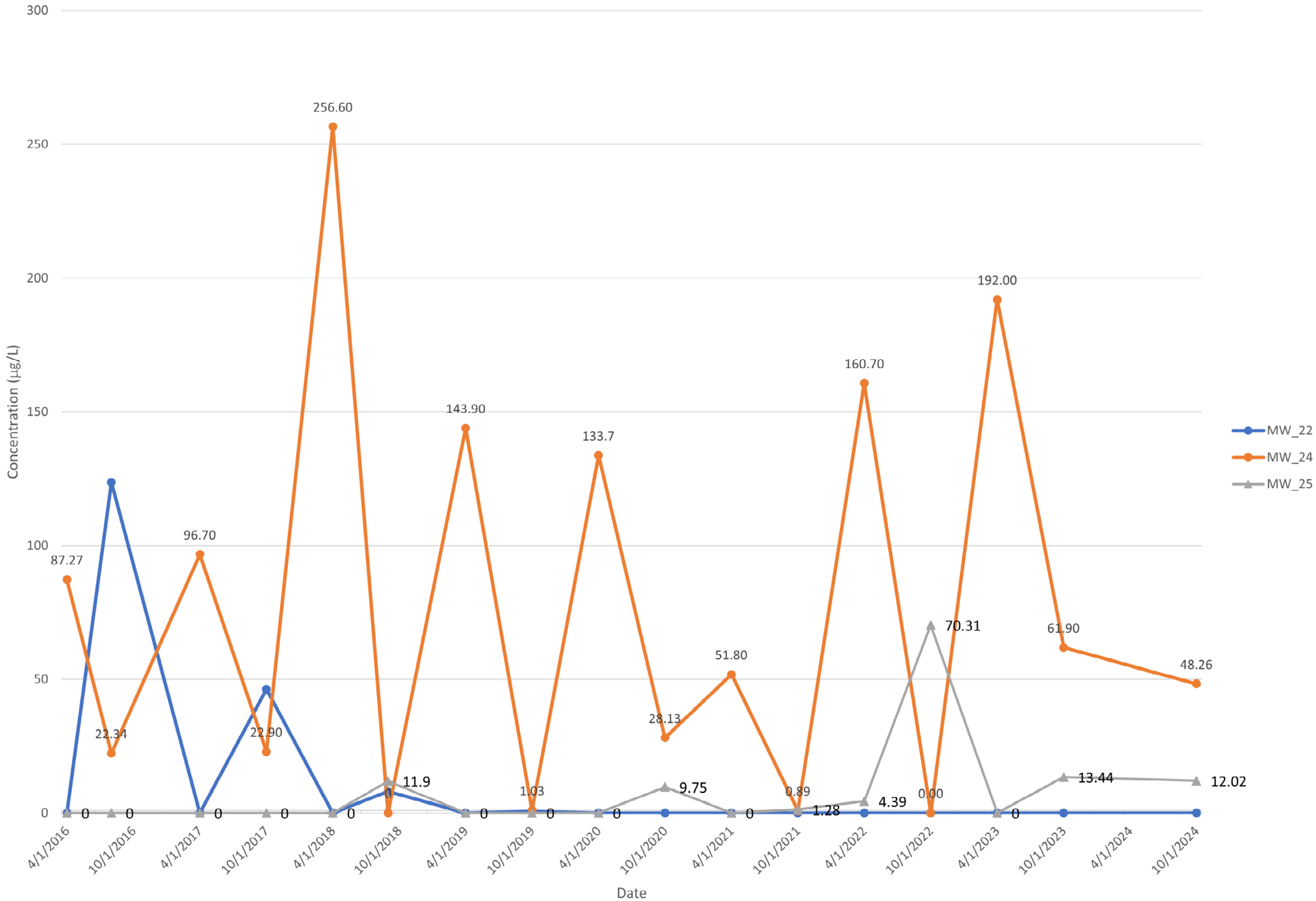


**Photo 7 – Looking northeast across central portion of the Site, MW-20 visible in foreground.**

Site Management Periodic Review  
Report and IC/EC Certification (2024)  
RG&E – Brockport Former MGP Site (V00301)  
Village of Brockport, Monroe County, New York  
January 2025

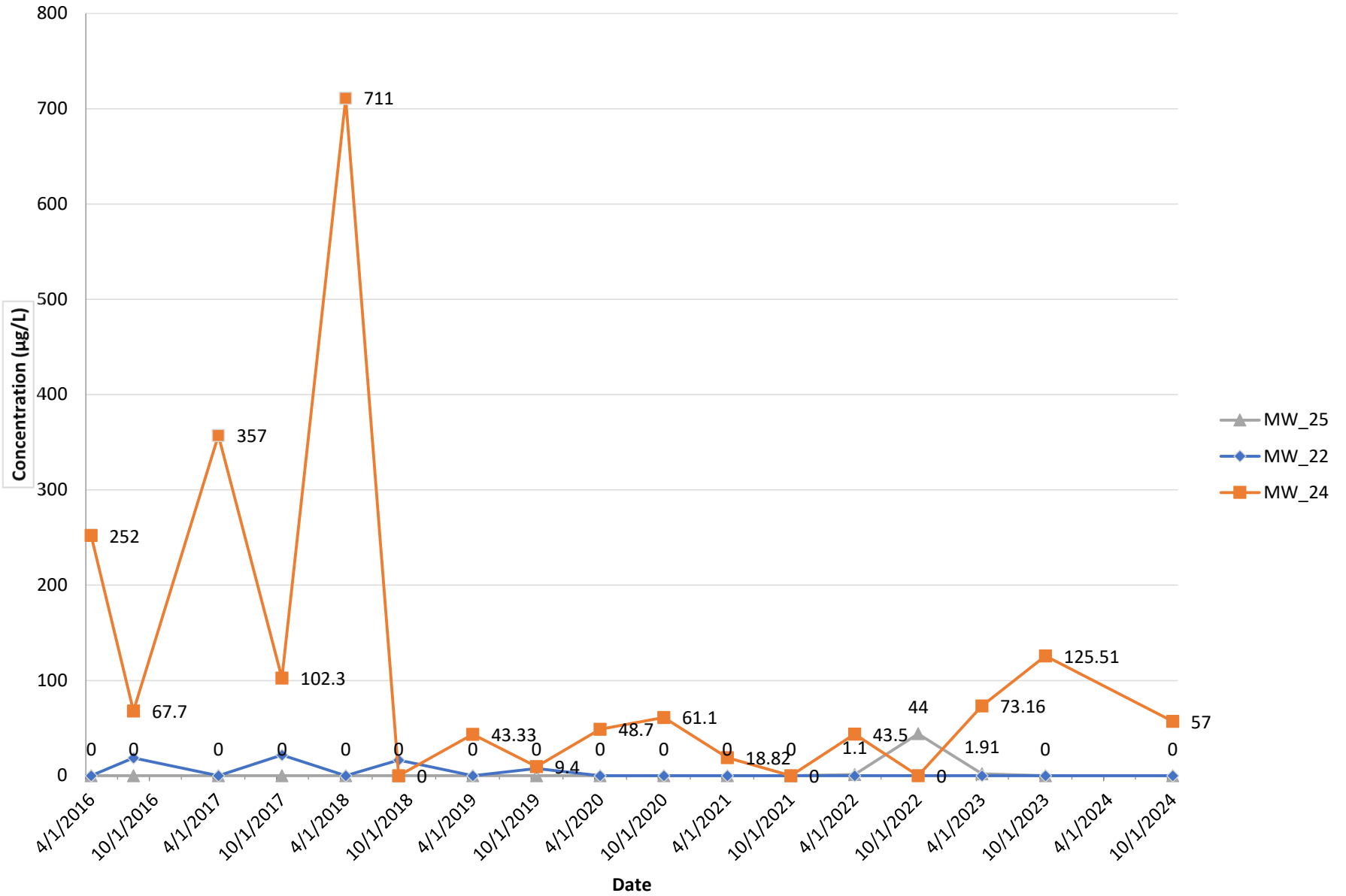
**Appendix C**  
**Time Series Plot of COIs**

# Total BTEX Concentrations

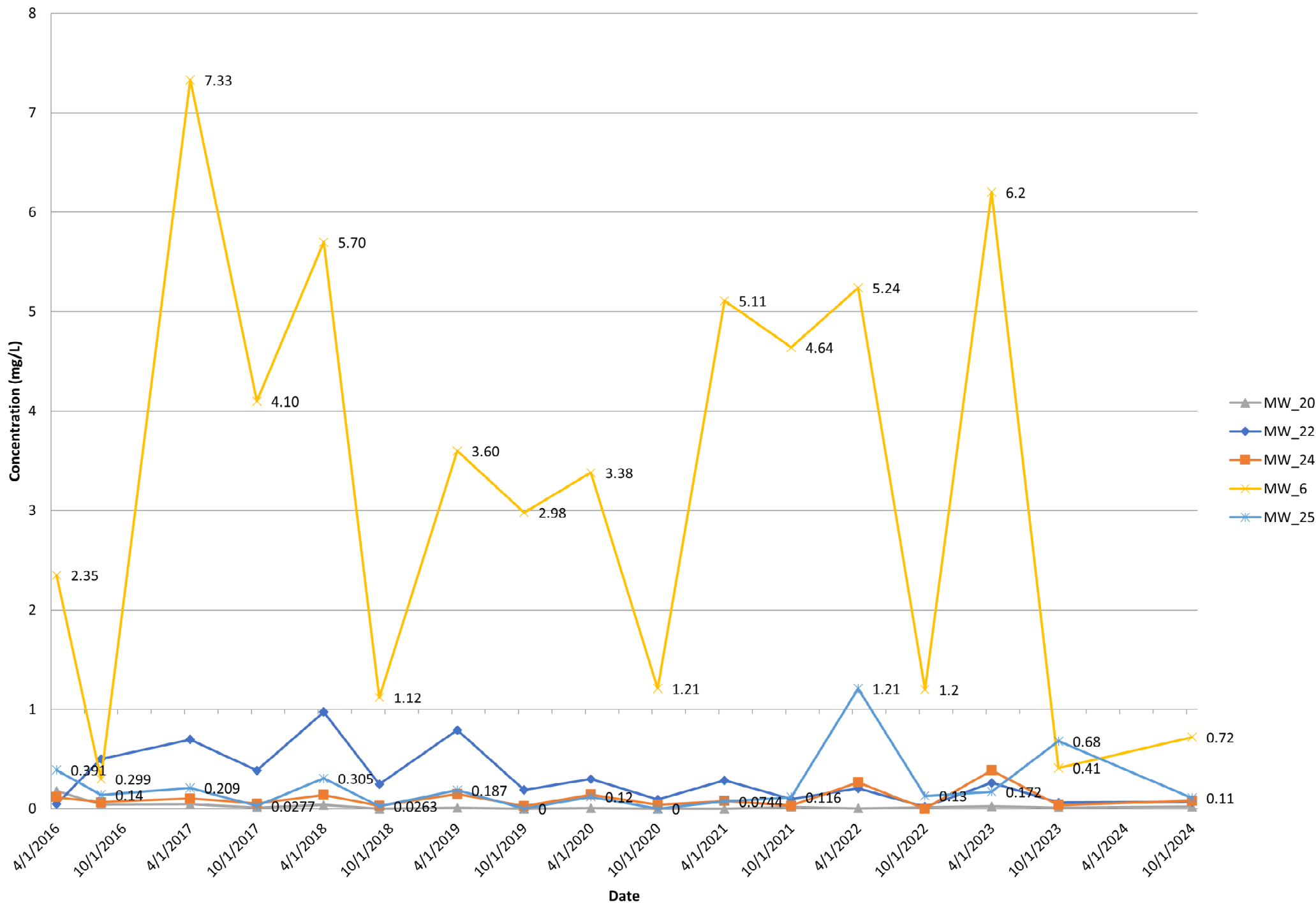




# Total PAH Concentrations



# Total Cyanide Concentrations



Site Management Periodic Review  
Report and IC/EC Certification (2024)  
RG&E – Brockport Former MGP Site (V00301)  
Village of Brockport, Monroe County, New York  
January 2025

**Appendix D**  
**Institutional and Engineering Controls Certification**



**Enclosure 2**  
**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**  
**Site Management Periodic Review Report Notice**  
**Institutional and Engineering Controls Certification Form**



	Site Details	Box 1
<b>Site No.</b>	<b>V00301</b>	
<b>Site Name RGE - Brockport MGP Site</b>		
Site Address: Erie & Perry Streets (& NYS Barge Canal)      Zip Code: 14420		
City/Town: Brockport		
County: Monroe		
Site Acreage: 0.670		
Reporting Period: January 01, 2024 to January 01, 2025		
		YES    NO
1.	Is the information above correct?	<input checked="" type="checkbox"/> <input type="checkbox"/>
	If NO, include handwritten above or on a separate sheet.	
2.	Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?	<input type="checkbox"/> <input checked="" type="checkbox"/>
3.	Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	<input type="checkbox"/> <input checked="" type="checkbox"/>
4.	Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	<input type="checkbox"/> <input checked="" type="checkbox"/>
	<b>If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.</b>	
5.	Is the site currently undergoing development?	<input type="checkbox"/> <input checked="" type="checkbox"/>
		<b>Box 2</b>
		YES    NO
6.	Is the current site use consistent with the use(s) listed below? Restricted-Residential, Commercial, and Industrial	<input checked="" type="checkbox"/> <input type="checkbox"/>
7.	Are all ICs in place and functioning as designed?	<input checked="" type="checkbox"/> <input type="checkbox"/>
<b>IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.</b>		
<b>A Corrective Measures Work Plan must be submitted along with this form to address these issues.</b>		
_____ Signature of Owner, Remedial Party or Designated Representative		_____ Date

**Description of Institutional Controls**

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
	Rochester Gas and Electric	Ground Water Use Restriction Soil Management Plan Landuse Restriction Monitoring Plan Site Management Plan IC/EC Plan

**Institutional Controls:**

o Imposition of a Declaration of Covenants and Restrictions (Deed Restriction) that will:

Restrict use of the real property comprising the Site to: Restricted Residential use as described in 6 NYCRR Part 375-1.8(g)(2)(ii), and provided such use is consistent with local zoning; or Commercial use as described in 6 NYCRR Part 375-1.8(g)(2)(iii); and/or Industrial use as described in 6 NYCRR Part 375-1.8(g)(2)(iv).

? The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH or the Monroe County Department of Health to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department.

Require inspection of Engineering Controls at the frequency and as described in the SMP.

Require periodic certification of institutional and engineering controls.

Require compliance with the SMP.

Access to the Site is provided to agents, employees, or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the Deed Restrictions.

Require that the potential for vapor intrusion must be evaluated for any buildings developed in the area impacted by the plume of remaining contaminants in groundwater and within the IC boundaries noted in the SMP, and any potential impacts that are identified must be monitored or mitigated.

Prohibit vegetable gardens and farming on the Site.

**Description of Engineering Controls**

<u>Parcel</u>	<u>Engineering Control</u>
	Cover System Monitoring Wells

**Engineering Controls:**

Maintain the existing soil cover system, including use of the Excavation Work Plan (EWP) provided in Appendix B of the SMP, which outlines the procedures required to be implemented in the event the soil cover system is breached, penetrated, or temporarily removed, and any underlying remaining contamination is disturbed. Monitoring of selected wells are conducted by RGE.

### Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the Engineering Control certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

2. For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:

(a) The Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

**A Corrective Measures Work Plan must be submitted along with this form to address these issues.**

\_\_\_\_\_  
Signature of Owner, Remedial Party or Designated Representative

\_\_\_\_\_  
Date

IC CERTIFICATIONS  
SITE NO. V00301

Box 6

**SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE**

I certify that all information and statements in Boxes 1,2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Albert G. Lyons, Jr. at Lyons Engineering, PPC  
10 Jones Ave  
Rochester, NY 14608  
print name print business address

am certifying as Owner Representative (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

Albert G Lyons Jr  
Signature of Owner, Remedial Party, or Designated Representative  
Rendering Certification

1/30/25  
Date

EC CERTIFICATIONS

Box 7

Qualified Environmental Professional Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Albert G. Lyons, Jr at Lyons Engineering, P.C.  
10 Jones Ave  
Rochester, NY 14608  
print name print business address

I am certifying as a Qualified Environmental Professional for the Owner (Remedial Party)

Albert G Lyons Jr  
Signature of Qualified Environmental Professional, for  
the Owner or Remedial Party, Rendering Certification



Stamp  
(Required for PE)

1/30/25  
Date