New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 8
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Denise M. Sheehan
Commissioner

February 10, 2006

Mr. Peter Morton
Passero Associates
100 Liberty Pole Way
Rochester, New York 14604

Re: Fischbach & Moore Site
235 Metro Park
Site No. V00492-8
January 2006 Remedial Design Investigation Work Plan

Dear Mr. Morton:

The New York State Department of Environmental Conservation (NYSDEC), in coordination with the New York State Department of Health (NYSDOH), has completed its review of the January 2006 Remedial Design Investigation Work Plan (Work Plan) for the Fischbach & Moore site (Site) located at 235 Metro Park, Town of Brighton. Based upon the information and representations given in the Work Plan, the additional investigation work can be performed with the following modifications and clarifications.

1. A modified Figure #1 (Attachment #1) shows the proposed alternate locations for certain shallow, intermediate, and deep groundwater monitoring wells at the Site. Typically shallow and deep monitoring wells are clustered together. See modified Figure #1 for the proposed location of the monitoring wells. The locations shown on the modified Figure #1 are approximate and will be subject to field conditions.

   An intermediate monitoring well is needed to evaluate the zone between the shallow and deep wells. The Test Boring Report for MW-4D indicates that there is a plastic clay layer located between 55-60 feet at the Site. Consider constructing the intermediate monitoring well such that the bottom of the monitoring well is sitting on top of the plastic clay layer. This interval should allow for the evaluation of the groundwater in the zone between the shallow and deep monitoring wells. The placement and depth of the intermediate monitoring well will be subject to field conditions.

2. The data collected from the bioscan analysis will be used in the engineering analysis to determine which remedy will achieve the cleanup goals for the Site. The Remedial Action Selection Report (RAS Report) presents the engineering analysis. The RAS Report must be certified by a professional engineer registered in New York State. The RAS Report can be incorporated into the Remedial Action Work Plan or submitted to the NYSDEC separately. Section 7.4 of the Voluntary Cleanup Program Guide (May 2002) provides the minimum issues that the engineering analysis must address.

3. The proposed groundwater monitoring wells (shallow, intermediate, and deep) will be installed in accordance with the July 1, 2002 Voluntary Cleanup Agreement Work Plan (VCA Work Plan) and the July 25, 2002 VCA Work Plan Addendum.

4. The NYSDEC understands that the boring soil samples collected for laboratory analysis will be collected at the same time as the headspace screening samples. A Data Usability Summary Report (DUSR) must be prepared in accordance with Appendix 2B of DER-10.

   The specifications for the PID are requested. PID readings will be recorded in field log book and a summary table of the PID readings will be provided in the investigation report.

   The soil cuttings generated must be containerized in 55-gallon drums for characterization purposes. The containerized soils may be returned to the Site upon receipt of the analytical data (must meet TAGM #4046) and with NYSDEC's approval.

5. The last round of groundwater sampling was completed in December 2003. In addition to sampling the 11 new groundwater monitoring wells, the following existing monitoring wells should be sampled: MW-3, MW-4S, MW-4D, MW-5, MW-6, and MW-10. The groundwater samples will be analyzed for Target Compound List (TCL) VOCs. A DUSR must be prepared in accordance with Appendix 2B of DER-10.

   The newly constructed monitoring wells will be given 48 hours (at a minimum) to equilibrate prior to development. The existing groundwater monitoring wells listed above will also be developed. The groundwater sampling event can occur 2 weeks (at a minimum) after the development of the wells. Static water levels will be collected from the new and all existing monitoring wells. A groundwater contour map should be generated as part of the investigation report to confirm groundwater flow direction at the Site has not changed.

6. The NYSDEC understands that the monitoring wells will be purged and sampled using low-flow techniques with dedicated polyethylene tubing or disposable polyethylene bailers. The selected method for purging will be the same method used for sample collection (e.g., purging done with a low-flow peristaltic pump then the sampling will be done with a low-flow peristaltic pump). The low-flow parameters and guidelines will be met/followed during the purging of the monitoring wells (i.e., new and existing) at the Site:

   - Drawdown not to exceed 3.9 inches.
   - Turbidity: three (3) successive readings ± 10% and a final value between 5 and 10 NTUs.
   - Specific conductance: three (3) successive readings ± 3%.
   - pH: three (3) successive readings ± 0.1 pH units.
   - Temperature: three (3) successive readings ± 3%.
   - Dissolved oxygen: three (3) successive reading ± 10%.
   - Oxidation reduction potential: three (3) successive readings ± 10 mv.

   The following parameters and guidelines will be met/followed when purging monitoring

wells (i.e., new and existing) with disposable polyethylene bailers:

- Three (3) well volumes will be removed from the monitoring wells.
- Turbidity readings will be less than 50 NTUs.

The NYSDEC understands that dedicated bladder pumps and polyethylene tubing or bladder pumps with disposable bladders and polyethylene tubing will be used to purge the monitoring wells and collect the groundwater samples.

7. A survey of the Site must be completed once the new monitoring wells have been installed. The survey map must show the Site's groundwater monitoring wells (new and existing). The Site survey will be performed to provide x, y, z coordinate data for each monitoring well relative to the Site datum. The elevation data should be expressed using the NGVD '88 coordinate system and the horizontal measurements using the NAD '83 UTM Zone 18 coordinate system.

Based on information presented in the Voluntary Cleanup Site Investigation Addendum (April 2005) and the revised Site Investigation Report (December 2005), there have been two different explanations presented regarding the elevated levels of polycyclic aromatic hydrocarbons (PAHs) detected at the Site: tar or asphalt pieces in the original soil samples and leachate from nearby asphalt covered surfaces. Surficial #7 should be re-sampled to determine if the elevated PAHs are contaminants of concern relative to Fischbach & Moore activities. The re-sampling of Surficial #7 should include 3 sample locations in a triangular formation: two (2) sample locations approximately 10 feet from the paved driveway and 10 feet apart. The third sample location located 20 feet from the paved driveway. See modified Figure #1 for the proposed orientation of the surficial soil sample locations.

Signs are required at sites where remedial actions are being performed under on of the following remedial programs: State Superfund, Voluntary Cleanup Program (VCP), Brownfield Cleanup Program (BCP), and Environmental Restoration Program (ERP). 235 Metro Park Associates, LLC is required to post a sign at the Fischbach & Moore Site prior to the start of any remedial activities, including IRMs. The sign instructions and sign template for the Fischbach & Moore Site have been included as attachments (Attachment #2) with this letter for your guidance.

If you wish to discuss any of the above comments, you can contact me at 585-226-5354.

Sincerely,

Charlotte B. Theobald
Environmental Engineer 1

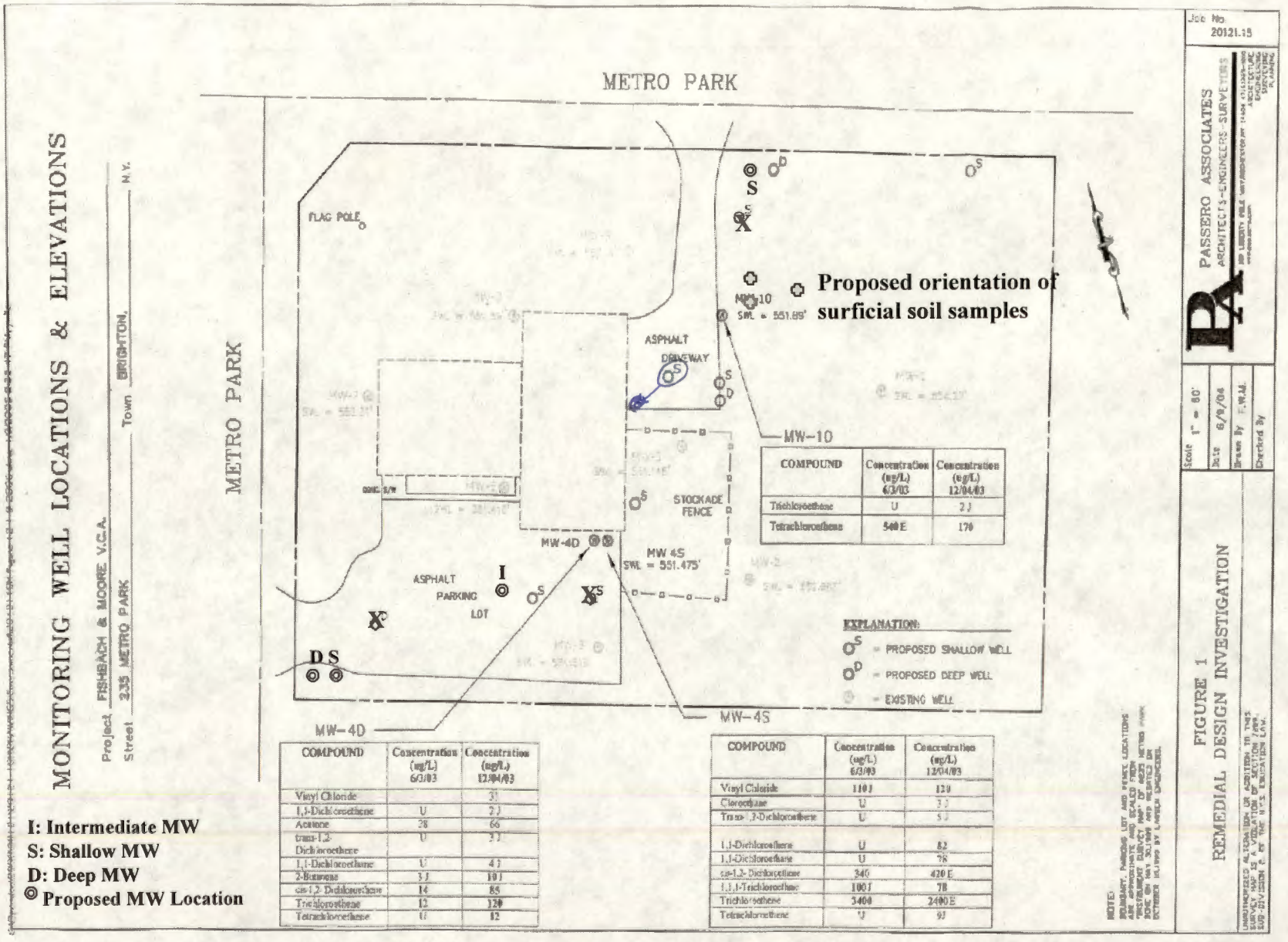
Attachments

cc: (w/attachment)
Dan O'Brien (Woods Oviatt Gilman)
Mark VanValkenburg (NYS Dept. of Health - Troy)

Debbie McNaughton, (NYS Dept. of Health – Rochester)
Joe Albert (Monroe County Health Dept.)

ec: (w/o attachments)
Bart Putzig, P.E. (NYSDEC)
Edward Belmore, P.E. (NYSDEC)
Joe Ryan (NYSDEC)

ATTACHMENT #1



COMPOUND	Concentration (ug/L) 6/3/03	Concentration (ug/L) 12/04/03
Trichloroethene	U	2 J
Tetrachloroethene	540 E	170

COMPOUND	Concentration (ug/L) 6/3/03	Concentration (ug/L) 12/04/03
Vinyl Chloride		3 J
1,1-Dichloroethene	U	2 J
Acetone	28	66
trans-1,2-Dichloroethene	U	2 J
1,1-Dichloroethane	U	4 J
2-Butanone	3 J	10 J
cis-1,2- Dichloroethene	14	85
Trichloroethene	12	120
Tetrachloroethene	U	12

COMPOUND	Concentration (ug/L) 6/3/03	Concentration (ug/L) 12/04/03
Vinyl Chloride	1100 J	120
Chloroethane	U	3 J
Trans-1,2-Dichloroethene	U	5 J
1,1-Dichloroethene	U	82
1,1-Dichloroethane	U	78
cis-1,2- Dichloroethene	340	420 E
1,1,1-Trichloroethane	1000 J	78
Trichloroethene	3400	2490 E
Tetrachloroethene	U	93

MODIFIED FIGURED #1

ATTACHMENT #2

SITE SIGNS FOR REMEDIAL PROGRAMS

Instructions

Signs are required at sites where remedial actions are being performed under one of the following remedial programs: State Superfund, Voluntary Cleanup Program (VCP), Brownfield Cleanup Program (BCP), and Environmental Restoration Program (ERP). They will not be required during the investigation and design phases. The cost of the sign will be borne by the parties performing the remedial action based on the legal document the activities are being performed under (i.e. volunteers/participants would pay 100% of the cost under the BCP; municipalities would pay 100% and then would be reimbursed for the cost under the ERP).

Sign Requirements

Size: Horizontal format - 96" wide by 48" high

Construction Materials: Aluminum or wood blank sign boards with vinyl sheeting.

Inserts: "Site Name", "Site Number", "Name of Party Performing Remedial Activities" and "Municipal Executive".
Indicate position, size and topography for specific inserts.

Color Scheme: Copy surrounding DEC logo - "NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION" - PMS 355

DEC logo: PMS 301 Blue
PMS 355 Green

Text:

Program (choose one):	PMS 301
Brownfield Cleanup Program	
Voluntary Cleanup Program	
State Superfund Program	
1996 Clean Water/Clean Air Bond Act - Environmental Restoration Program	
Site Name, Site Number, Party Performing Remedial Activities	PMS 355
Names of Governor, Commissioner, Municipal Executive	PMS 301
Transform the Past.....Build for the Future	PMS 355

Type Specifications: All type is Caslon 540, with the exception of the logotype.
Format is: center each line of copy with small caps and initial caps.

Production Notes: 96" wide x 48" high aluminum blanks will be covered with vinyl sheeting to achieve background color. Copy and logo will be silk screened on this surface.

See attached format

Program Name

Site Name
Site Number
Name of Party Performing Remedial Activities

Governor
Commissioner
Municipal Executive

Transform the Past…. Build for the Future

Voluntary Cleanup Program

235 Metro Park (Fischbach & Moore Site)
V00492-8
Town of Brighton

George E. Pataki, Governor
Denise M. Sheehan, Commissioner
Sandra L. Frankel, Town Supervisor

Transform the Past…. Build for the Future