

May 29, 2019

Mr. Todd M. Caffoe, P.E.
Project Manager
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414

VIA EMAIL: ToddCaffoe@dec.ny.gov

Re: Former Brainerd Manufacturing Site #V00519-8
115 North Washington Street, East Rochester, NY
Monitoring Results and Proposed Schedule

Dear Mr. Caffoe:

On behalf of Despatch Industries Inc., Benchmark Environmental Engineering & Science, PLLC (Benchmark) herein provides a summary of the recent groundwater monitoring and presents a schedule for moving toward remedial system decommissioning and termination of activities at the Former Brainerd Manufacturing Facility (see Figure 1).

POST-INJECTION GROUNDWATER MONITORING

Since submittal of the 2018 Periodic Review Report (PRR) in December 2018 and the initial PlumeStop injection, Benchmark performed an additional corrective measure in the source area. On January 11 and 14, 2019, Benchmark injected directly into monitoring well MW-6 a total of 400 pounds (equivalent to 48 gallons) of PlumeStop mixed with water. Over a 13-hour period between these two days, a total of approximately 230 gallons of PlumeStop/water was injected. Injection over two days was necessary because of daylighting of the PlumeStop mixture. Benchmark redeveloped well MW-6 on February 8 and collected a sample from MW-6 on February 22 for analysis of Target Compound List (TCL) volatile organic compounds (VOCs).

As indicated on Table 1, the only VOC detected in well MW-6 was methylene chloride, a laboratory contaminant, at a concentration below its New York State Department of Environmental Conservation (NYSDEC) Class GA groundwater quality standards and guidance value (GWQS/GV). Neither tetrachloroethene (PCE) nor trichloroethene (TCE) were detected above the method detection limit (MDL).

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NEXT STEPS

To further confirm the success of the corrective action, we propose performing semi-annual groundwater monitoring in June and November 2019 at the following wells (see Figure 2):

- Former Source Area Wells MW-4, MW-5, MW-6 and PW-1R
- Downgradient Off-Site Wells MW-9 and MW-12
- Upgradient Well MW-2

If the December 2019 groundwater concentrations confirm success of the corrective actions, we will request NYSDEC approval to terminate groundwater monitoring in accordance with Section 2.2.2.1 of the 2013 Site Management Plan (SMP). If the Department concurs that groundwater monitoring can be terminated, we will then submit a decommissioning plan for the Interim Remedial Measures (IRM) pump and treat and gPRO groundwater treatment systems and associated pumping and injection wells.

The Site Owner/Operator will continue to operate the active sub-slab depressurization (ASD) system and record vacuum readings at each of the six interior manometers associated with the roof-top fans (this will occur monthly during occupancy as the building is currently vacant). This data and cover system inspections will be reported annually in the PRR.

Please contact us if you have any questions or require additional information.

Sincerely,
Benchmark Environmental Engineering & Science, PLLC



Thomas H. Forbes, P.E.
Principal Engineer

Att.
cc: Bernette Schilling (NYSDEC Region 8)
Alan Shaffer (Despatch)
Wade Lippman
Lori Riker (Benchmark)

File: 0040-002-400

TABLE



TABLE 1
SUMMARY OF GROUNDWATER ANALYTICAL RESULTS
CORRECTIVE ACTION PLAN
Former Brainerd Manufacturing Facility
East Rochester, New York

Parameter ¹	GWQS/GV ²	Monitoring Well Location																																				
		MW-5															MW-6															PW-1R						
		Historic Groundwater Sampling Events															Historic Groundwater Sampling Events															Historic Groundwater Sampling Events						
08/22/06	01/30/12	03/05/13	06/26/13	9/25/13	12/04/13	06/04/14	06/04/15	06/28/16	07/10/17	11/30/17	02/27/18	06/04/18	08/22/06	01/30/12	03/05/13	06/26/13	09/25/13	12/04/13	06/04/14	06/04/15	06/28/16	07/10/17	11/30/17	02/27/18	06/04/18	08/08/18	10/29/18	2/22/19 ⁵	1/30/12	6/4/14	6/4/15	6/28/16	07/10/17	11/30/17	02/27/18	06/04/18		
TCL Volatile Organic Compounds (ug/L)																																						
Acetone	50	ND	ND	ND	ND	3.4 J	3.3 J	ND	ND	7.3 J	200	200	63 J	ND	ND	ND	ND	5.0 J	ND	ND	ND	ND	ND < 150	49	12 J	ND	ND	ND	ND	ND	ND	13	6.9 J	ND	30 J	6.0 J	8.2 J	
Bromodichloromethane	5	ND	ND	0.51 J	ND	ND	ND	ND	0.54 J	ND	ND	ND	ND	ND	4.4	0.47 J	ND	ND	ND	ND	ND	ND	ND < 20	ND	ND	ND	ND	ND	ND	ND	ND	1.8 J	ND	ND	ND	ND	ND	
Bromoform	50	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
2-Butanone (MEK)	50	ND	ND	ND	ND	ND	ND	ND	ND	ND	71 J	320	45 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND < 66	8.7 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	160	ND	ND		
Carbon Disulfide	60	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
Dibromochloromethane	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND < 16	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
Methylene chloride	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	87	ND	ND	ND	ND < 22	ND	ND	3.8 J	3.8 J	3.4 J	ND	12	ND	ND	ND	2.4 J	ND	ND		
Methyl tert-butyl ether	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
Methyl Acetate	NR	ND	ND	ND	ND	ND	ND	4.4	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
Toluene	5	ND	ND	ND	ND	0.51 J	0.71 J	ND	ND	ND	ND < 5.1	ND < 5.1	ND < 5.1	3.2 J	0.95 J	ND	ND	1.6	ND	ND	ND	ND	ND < 26	ND	ND	ND	ND	ND	ND	ND	3.5 J	2 J	ND	ND	ND	ND		
Chloroform	7	1.4 J	1.3	18	ND	ND	ND	ND	0.98 J	ND	ND	ND	ND	ND	14	2	ND	ND	0.51 J	ND	ND	ND	ND < 17	ND	ND	ND	ND	ND	ND	1.1	1.3 J	0.72 J	ND	ND	0.44 J	ND		
Tetrachloroethene	5	1600	2800	590	400	150	110	50	40	530 D	14	ND	ND	ND	3100	1700	410	1600	1300	1600	1500	570	1200	390	90	3.5 J	120	290	170	ND<1.4	360	92	160	120	100	0.74 J	2.9	
Trichloroethene	5	1400	1500	260	240	59	52	23	20	330 D	8.5	ND	ND	ND	1500	660	95	520	450	570	560	130	340	110	51	4.9	88	130	140	ND<1.8	220	75	94	71	70	ND	4.7	13
Trichlorofluoromethane	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND < 44	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
1,1-Dichloroethene	5	0.56 J	0.67 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND < 15	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
cis-1,2-Dichloroethene	5	0.80 J	0.95 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND < 41	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
trans-1,2-Dichloroethene	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND < 9.0	ND < 9.0	ND < 9.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND < 45	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
1,1,1-Trichloroethane	5	11	6.3 J	1.3	ND	ND	ND	ND	1.5	ND	ND < 8.2	ND < 8.2	ND < 8.2	16 J	4	ND	ND	ND	3.8	ND	ND	ND	ND < 41	ND	ND	ND	ND	ND	0.96 J	ND	ND	ND	ND	ND	ND	ND		
1,1,2-Trichloroethane	1	1.5 J	ND	ND	ND	ND	ND	ND	0.57 J	ND	ND < 2.3	ND < 2.3	ND < 2.3	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND < 12	ND	ND	ND	ND	ND<0.92	ND	ND	ND	ND	ND	ND	ND	ND		
1,1-Dichloroethane	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND < 19	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
4-Isopropyltoluene	5	--	ND	ND	ND	ND	--	--	--	ND	ND	ND	ND	--	ND	ND	ND	ND	ND	ND	ND	ND	ND < 16	ND	ND	ND	ND	--	ND	--	--	--	ND	ND	ND	ND		
Total Chlorinated VOCs⁴	NA	3,000	4,302	850	640	209	162	73	60	860	23	0	0	0	4,600	2,360	505	2,120	1,750	2,170	2,060	700	1,540	500	141	8.4	208	420	310	0	580	167	254	191	170	0.0	5.4	16

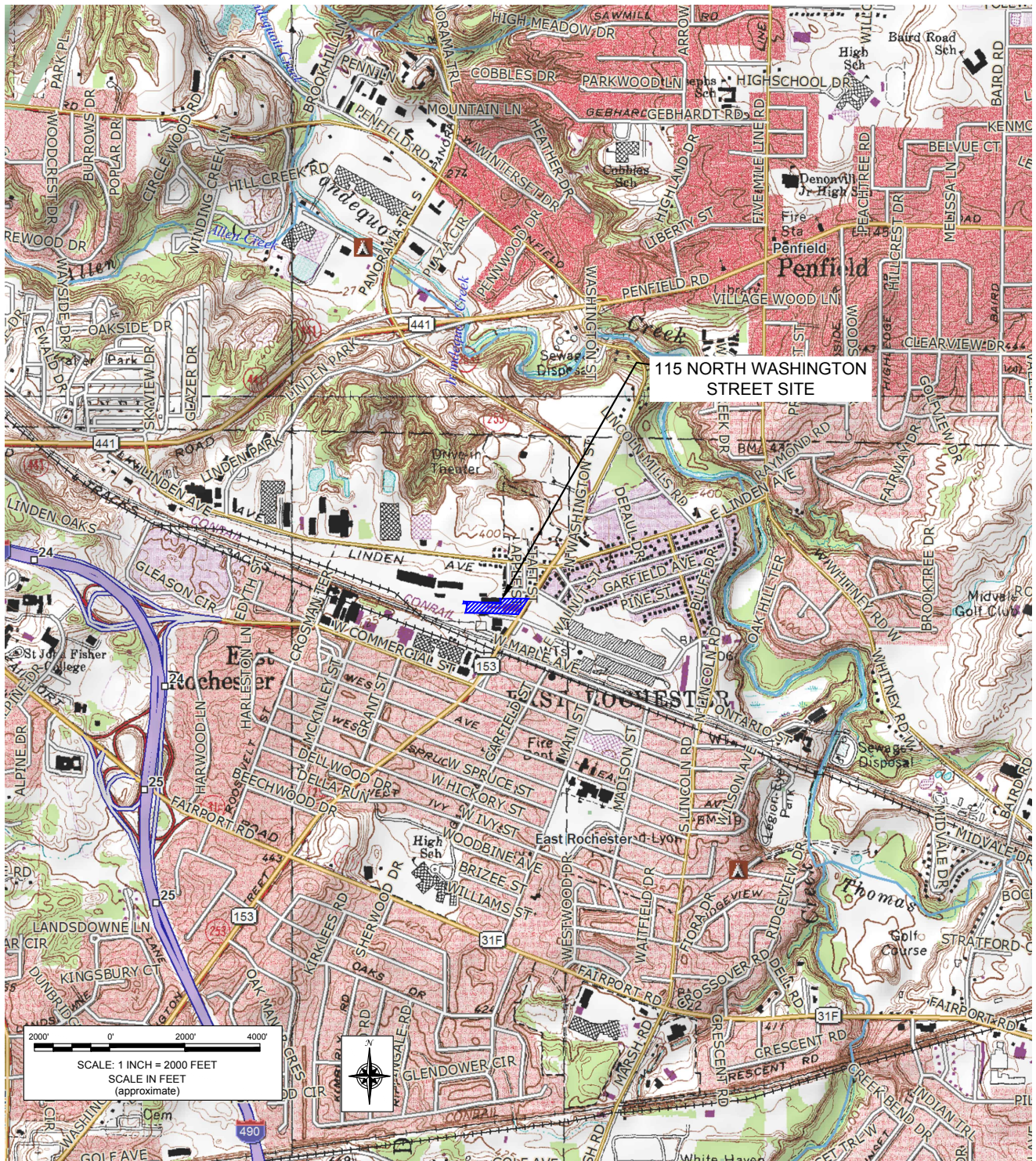
- Notes:**
- Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.
 - MS/MSD collected at PW-1.
 - NYSDEC Class "GA" Groundwater Quality Standards/Guidance Values (GWQS/GV), 6 NYCRR Part 703.
 - Sum of chlorinated VOCs means adding the concentrations of tetrachloroethene, trichloroethene, cis & trans-1,2-dichloroethene, and 1,1-dichloroethene.
 - Sampling occurred following 1/11/2019 injection of PlumeStop directly into well MW-6 and redevelopment on 2/8/19.

Definitions:
 J = Estimated value; result is less than the sample quantitation limit but greater than zero.
 ND = parameter not detected above laboratory detection limit.
 NR = parameter not regulated by 6NYCRR TOGS 1.1.1 Part 703
 N* = Indicates the spike or duplicate analysis is not within the quality control limits
 *-- = Not analyzed

BOLD = Analytical result exceeds individual GWQS/GV.

FIGURES

FIGURE 1



115 NORTH WASHINGTON STREET SITE

2000' 0' 2000' 4000'
 SCALE: 1 INCH = 2000 FEET
 SCALE IN FEET
 (approximate)



2558 HAMBURG TURNPIKE
 SUITE 300
 BUFFALO, NY 14218
 (716) 856-0599

SITE LOCATION AND VICINITY MAP

PERIODIC REVIEW REPORT

FORMER BRAINERD MANUFACTURING FACILITY
 EAST ROCHESTER, NEW YORK
 NYSDEC SITE NO. V00519-8

PREPARED FOR

DESPATCH INDUSTRIES, INC.

PROJECT NO.: 0040-002-400

DATE: AUGUST 2016

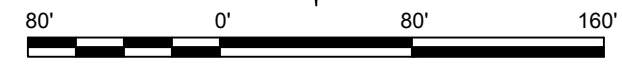
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LEGEND

- ◆ PW-1 PUMPING WELL LOCATION
- ◆ MW-4 EXISTING MONITORING WELL LOCATION
- ◆ RW-1 REINJECTION WELL LOCATION
- APPROXIMATE FORMER BRAINERD PROPERTY BOUNDARY
- SITE
- EXTERNAL UNDERGROUND PIPING FROM gPRO TREATMENT UNIT TO RECHARGE WELLS



1" = 80'
SCALE IN FEET
(approximate)

NOTES:
1. DATE OF AERIAL PHOTOGRAPHY APRIL 2016; SOURCE GOOGLE EARTH.

SITE PLAN AND AERIAL

PERIODIC REVIEW REPORT
FORMER BRAINERD MANUFACTURING FACILITY
EAST ROCHESTER, NEW YORK
NYSDEC SITE NO. V00519-8
PREPARED FOR
DESPATCH INDUSTRIES, INC.



JOB NO.: 0040-002-400

FIGURE 2

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