EXPLANATION OF SIGNIFICANT DIFFERENCE
J&S CONVEYOR SITE

Hamlet of Honeoye / Ontario County / Site No. V00644 / November 2013

Prepared by the New York State Department of Environmental Conservation
Division of Environmental Remediation

1.0 INTRODUCTION

The purpose of this notice is to describe the progress of the cleanup at the Former J&S Conveyor Property (Site) and to inform you about a change in the Site remedy. The Site is located at 39 East Main Street in the Hamlet of Honeoye (see Figures 1 & 2). On June 29, 2006, the New York State Department of Environmental Conservation approved a remedial action plan (RAP) dated April 2006. The RAP included excavation adjacent to the former paint shop to address paint solvents found in soil and groundwater. Additional groundwater and surface soil samples collected at the request of the Department showed that the paint solvents have degraded (no detections of volatile organic compounds in groundwater) and no longer require removal. An area of surface soils remains impacted by inorganic metals, primarily lead (see Figure 3). The revised remedy calls for excavation and off-site disposal of the lead-impacted surface soil as described in section 3 below.

This Explanation of Significant Difference (ESD) will become part of the Administrative Record for this Site. The information here is a summary of what can be found in greater detail in documents that have been placed in the following repositories:

Honeoye Public Library
8708 Main Street
PO Box 70
Honeoye, New York 14471
585-229-5020

Monday: 2:30 - 8:30
Tuesday: 10 - 8:30
Wednesday: closed
Thursday: 2:30 - 8:30
Friday: closed
Saturday: 10 - 1
Sunday: closed

NYSDEC – Region 8
Attn: James Craft
6274 East Avon-Lima Road
Avon, NY 14414
(585) 226-5352
jhcraft@gw.dec.state.ny.us

Monday-Friday: 8:45 – 4:45

Although this is not a request for comments, interested persons are invited to contact the Department's Project Manager for this site to obtain more information or have questions answered.

2.0 SITE DESCRIPTION AND ORIGINAL REMEDY

2.1 Site History, Contamination, and Selected Remedy

Location: The former J&S Conveyors site is located at 39 East Main Street in a commercial/industrial area of the Hamlet of Honeoye, NY (see Figures 1 and 2).

Site Features: The property is 3.44 acres in size and is improved with a 36,000 square foot building. Surrounding land use is industrial to the east and commercial to the west and north. To the south are woods and Mill Creek.

Past Use/Zoning: The property has been used for manufacturing since 1959 and is zoned Industrial. J&S Conveyors built steel-belted conveyors there from 1981 until 1997, when the property was reportedly abandoned due to financial difficulties. Currently the building is 95% vacant; current use is limited to a one-person shop is applying powder coating to metal.

In August 2000, a number of drums and containers of potentially hazardous material were removed and disposed by NYSDEC. In December 2000, a site investigation was conducted by the NYSDEC and a final site investigation report/remedial alternatives report was released in February 2002. Investigations indicated that soil contamination (paint solvents such as xylene and toluene and paint chips containing lead) is present in the vicinity of the former paint shop. As a result of the soil contamination, groundwater in the vicinity of the former paint shop was impacted by xylene, toluene, and other petroleum distillates.

In 2004, a local company, Custom Air Design (CAD), signed a purchase contract for the property with Ontario County (to be conveyed after cleanup) and signed a Voluntary Cleanup Agreement. Vapor intrusion work was conducted in March 2006. The remedial action work plan was finalized in July 2006 and included excavation of solvent and lead contaminated soils, groundwater monitoring, assessment of the potential for soil vapor intrusion, and deed restrictions (i.e., commercial/industrial use, annual reporting, and prohibition on groundwater use). However, the start of remedial action has been delayed by an ownership dispute.

The VCP volunteer, CAD went bankrupt and another party (Mr. Exman; Pownal Development) claimed property title with a quit claim deed. After a court proceeding, the County transferred the property to a new corporation, Poinkers, Inc. (owned by Mr. Greenebaum, owner of former CAD). Mr. Greenebaum has assured the County that cleanup will occur once clear title is achieved and has recently contacted the Department to plan the cleanup.

Site Geology and Hydrogeology:

Based upon investigations conducted to date, the primary contaminants of concern included xylene, toluene, trimethylbenzenes, and lead.

Soil: The soil profile is zero to four feet of poorly sorted fill (clay, silt, sand and gravel), then fine to coarse sand to about 11 feet followed by a clay layer of unknown thickness. Soil was found to be impacted by paint solvents consisting of xylene, toluene, and petroleum distillates which are restricted to a relatively small area near the former paint shop. An exterior area adjacent to the paint shop where paint chips were evident has shown elevated levels of lead up to 5120 milligrams per kilogram in surface soils (Figure. 3).

Groundwater: Localized groundwater impacts were also noted in the area of the former paint shop including xylene, toluene and other petroleum distillates up to 4.25 parts per million (ppm) total volatile organics. A thick clay layer protects a deeper confined aquifer which is a local public water supply. More recent sampling shows the impacts to the source area well, MW-2 have attenuated with no detections in the latest two sampling rounds.

Sub-Slab Soil Vapor and Indoor Air: Vapor intrusion testing was conducted in April 2006 The sub-slab of the paint shop showed the highest levels: Methyl ethyl ketone (5,900 micrograms/cubic meter; ug/m3), toluene (1,300 ug/m3), xylenes (890 ug/m3) and trimethylbenzenes (368 ug/m3). Indoor air in the office area showed methyl ethyl ketone (560 ug/m3), toluene (72 ug/m3), xylenes (123 ug/m3) and trimethylbenzenes (43 ug/m3). Methyl ethyl ketone was in use during testing which may have contributed to detections in indoor air.

The alternatives developed for the site and the evaluation of the remedial criteria are present in the Alternative Analysis. The remedy is selected pursuant to the remedy selection criteria set forth in DER-10, Technical Guidance for Site Investigation and Remediation.

The elements of the proposed remedy are as follows:

- Excavate lead-contaminated surface soils to a depth of one foot (75’ x 20’ x 1’ = 1,500 cu. ft. of soil) in order to achieve the commercial SCO of 1,000 ppm) ;

- Further evaluation of soil vapor intrusion at the on-site building and if future buildings are constructed at the site; and

- Implement deed restrictions (commercial/industrial use, prohibition on groundwater use, and notice of past spill(s) in the source area).

3.0 CURRENT STATUS

The elements of the approved remedy have been incorporated into the design document, a Remedial Action Plan. Groundwater monitoring has been conducted periodically, but the excavation portion had been delayed pending resolution of property ownership. Prior to starting excavation, the Department suggested additional groundwater sampling to assess the status of the volatile organic impacts to groundwater. This sampling resulted in a decision to seek a modification of the remedy as indicated herein.

4.0 DESCRIPTION OF SIGNIFICANT DIFFERENCE

4.1 New Information

Sampling in June 2010 and July 2011 showed no detections of VOCs in groundwater from source area well, MW-2 reflecting a downward trend in two previous sampling rounds. In December 2000, groundwater from MW-2 showed a total of 4.25 ppm of VOCs (3.3 ppm of xylene, 0.510 ppm of ethylbenzene, and 0.410 ppm of toluene). By May 2007, total VOCs had decreased to 0.045 ppm (a drop of two orders of magnitude) followed by no detections in June 2010 and July 2011. Petroleum contaminants readily biodegrade aerobically and the time-series data indicate that the contaminants have attenuated naturally.

Consideration of this development and comparison of soil sampling results to Part 375 Soil Cleanup Objectives (SCOs) allows for a significant reduction in the volume of the soil removal proposed in the 2006 RAP. In particular, none of the soil sampling results exceed VOC or semi-VOC SCOs for commercial or industrial use and the leaching potential of remaining VOC contaminants is no longer evident as shown by non-detections in source area groundwater.

Therefore, recent sampling allows for a revised remedy which includes removal of lead contamination (to achieve the commercial SCO of 1,000 ppm) in surface soils in the northern alcove near the paint shop, further evaluation of soil vapor intrusion in the on-site building and if future buildings are constructed at this site), and deed restrictions (i.e., commercial/industrial use, soils management, prohibition on groundwater use).

4.2 Comparison of Changes with Original Remedy

The excavation and removal component of the original Remedial Action Plan was intended to remove soils for the protection of groundwater and not necessarily those inconsistent with continued commercial/industrial use. While surface soils impacted with lead paint still remain elevated and will be addressed by the proposed remedy, contaminated deeper soil and groundwater have naturally attenuated and meet SCOs for commercial/industrial use.

5.0 SCHEDULE AND MORE INFORMATION

Site remediation will continue in accordance with the Remedial Action Plan as modified herein. Specifically, this ESD results in the soil excavation being limited to the lead impacted surface soils; the deeper soils previously impacted with volatile organics having undergone natural attenuation in the intervening time frame while property ownership issues were resolved. Following excavation, an institutional control in the form of a deed restriction will ensure future use is consistent with the remedial goals implemented at this site.

If you have questions or need additional information, you may contact any of the following:

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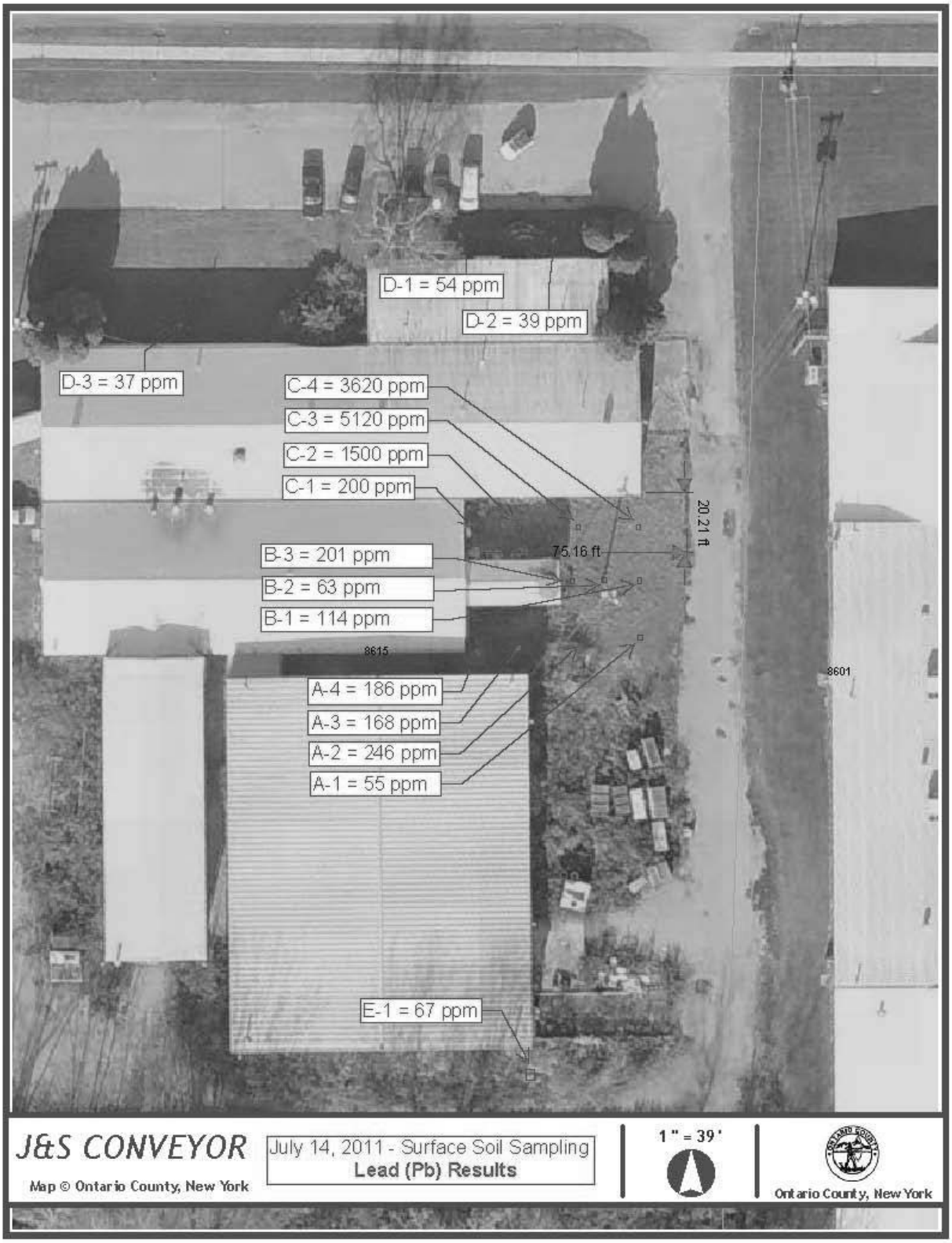
November 6, 2013
Date

Robert W. Schick, Director
Division of Environmental Remediation

FIGURE 1 – SITE LOCATION

FIGURE 2 – Former J&S Conveyor – 8615 Main St. Honeoye, NY 14471

FIGURE 3 – LEAD RESULTS IN SURFACE SOILS



J&S Conveyors - Table #1 - SOIL Analytical RESULTS

Detected Constituents	Concentration (ppm)a (n = 25 samples; highest detection listed)	Unrestricted SCG[b] (ppm)	Residential	Restricted Residential	Restricted Commercial	Restricted Industrial SCGc (ppm)	Protection of Ecological Resources	Protection of Ground Water
VOCs	(paint shop area)							
Xylene (mixed)	3.2	0.26	100	100	500	1,000	0.26	1.6
Toluene	0.15	0.7	100	100	500	1,000	36	0.7
1,2,4-Trimethylbenzene	2.9	3.6	47	52	190	380		3.6
1,3,5-Trimethylbenzene	1.8	8.4	47	52	190	380		8.4
METALS								
Lead	5120, 3620, 3440	63	400	400	1,000	3,900	63	450
(Lead screening w/XRF)	(% levels at surface near paint shop							
Cadmium	67j (Test Pit - 18)	2.5	2.5	4.3	9.3	60	4	7.5
Chromium, trivalent	228j (Test Pit 18)	30	36	180	1,500	6,800	41	
SVOCs	(Test Pit - 09)							
Benz(a)anthracene	0.19j	1	1	1	5.6	11		1
Benzo(a)pyrene	0.13j	1	1	1	1	1.1	2.6	22
Benzo(b)fluoranthene	0.29j	1	1	1	5.6	11		1.7
Benzo(g,h,i)perylene	0.19j	100	100	100	500	1,000		1,000
Benzo(k)fluoranthene	0.29j	0.8	1	3.9	56	110		1.7
Bis(2-ethylhexyl)phthalate	0.85j			50			239	100
Butylbenzylphthalate	0.44j			100				100
Chrysene	0.21j	1	1	3.9	56	110		1

Fluoranthene	0.28j	100	100	100	500	1,000		1,000
Indeno(1,2,3-cd)pyrene	0.22j	0.5	0.5	0.5	5.6	11		8.2
Phenanthrene	0.11j	100	100	100	500	1,000		1,000

a - ppm: parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil;
b - SCG: Part 375-6.8(a), Unrestricted Soil Cleanup Objectives.
c - SCG: Part 375-6.8(b), Restricted Soil Cleanup Objectives.
j - estimated concentration