

DECISION DOCUMENT

RGE Geneseo-Park St MGP
Voluntary Cleanup Program
Geneseo, Livingston County
Site No. V00731
August 2017



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

DECLARATION STATEMENT - DECISION DOCUMENT

RGE Geneseo-Park St MGP
Voluntary Cleanup Program
Geneseo, Livingston County
Site No. V00731
August 2017

Statement of Purpose and Basis

This document presents the remedy for the RGE Geneseo-Park St MGP site, a voluntary cleanup site. The remedial program was chosen in accordance with the New York State Environmental Conservation Law and applicable guidance.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the RGE Geneseo-Park St MGP site and the public's input to the proposed remedy presented by the Department.

Description of Selected Remedy

The elements of the remedy are as follows:

1. A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows;

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse gases and other emissions;
- Increasing energy efficiency and minimizing use of non-renewable energy;
- Conserving and efficiently managing resources and materials;
- Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;
- Maximizing habitat value and creating habitat when possible;
- Fostering green and healthy communities and working landscapes which balance ecological, economic and social goals; and
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.

2. A site cover currently exists in areas not occupied by buildings and will be maintained to allow for restricted residential use of the site. Any site redevelopment will maintain the existing site cover. The site cover may include paved surface parking areas, sidewalks or soil where the upper two feet of exposed surface soil meets the applicable soil cleanup objectives (SCOs) for

restricted residential use. Any fill material brought to the site will meet the requirements for the identified site use as set forth in 6NYCRR part 375-6.7(d).

3. Installation and operation of a coal tar recovery well to remove potentially mobile coal tar from the subsurface. The depth and type of recovery well will be determined during the design phase of the remedy. Coal tar will be collected periodically from the well; however, if the well is determined by the Department to accumulate large quantities of coal tar over extended time periods, it may be retrofitted with automatic collection system and additional wells may be added.

4. Institutional Control

Imposition of an institutional control in the form of an environmental easement for the controlled property which will:

- require the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8(h)(3);
- allow the use and development of the controlled property for restricted residential uses as described in Part 375-1.8(g)(2)(iii) and industrial uses as described in Part 375-1.8(g)(2)(iv), although land use is subject to local zoning laws;
- restrict the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County DOH; and
- require compliance with the Department approved Site Management Plan.

5. Site Management Plan

A Site Management Plan is required, which includes the following:

a) An Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective:

Institutional Controls: The Environmental Easement discussed in Paragraph 4 above.

Engineering Controls: The site cover and coal tar recovery well discussed in Paragraphs 2 and 3 above.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- descriptions of the provisions of the deed restriction including any land use and groundwater use restrictions;
- a provision for evaluation of the potential for soil vapor intrusion for future buildings developed on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;

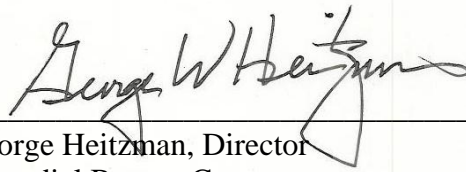
- a provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in Paragraph 2 above will be placed in any areas where the upper two feet of exposed surface soil exceed the applicable SCOs;
 - provisions for the management and inspection of the identified engineering controls;
 - maintaining site access controls and Department notification; and
 - the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.
- b) A Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:
- monitoring of groundwater to assess any change in the current conditions;
 - schedule of monitoring and frequency of submittals to the Department; and
 - monitoring for vapor intrusion for any buildings, as may be required by the Institutional and Engineering Control Plan discussed above.
- c) The Site Management Plan will be subject to an agreement between Rochester Gas and Electric Corporation and the property owner for site access and any other pertinent provisions to enable the maintenance of cover systems, management of remaining contamination, excavation, inspections, sampling, and/or any other requisite activities.

Declaration

The remedy conforms with promulgated standards and criteria that are directly applicable, or that are relevant and appropriate and takes into consideration Department guidance, as appropriate. The remedy is protective of public health and the environment.

August 18, 2018

Date



George Heitzman, Director
Remedial Bureau C

DECISION DOCUMENT

RGE Geneseo-Park St MGP
Geneseo, Livingston County
Site No. V00731
August 2017

SECTION 1: SUMMARY AND PURPOSE

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), has selected a remedy for the above referenced site. The disposal of contaminants at the site has resulted in threats to public health and the environment that would be addressed by the remedy. The disposal or release of contaminants at this site, as more fully described in this document, has contaminated various environmental media. Contaminants include hazardous waste and/or petroleum.

The Voluntary Cleanup Program (VCP) is a voluntary program. The goal of the VCP is to enhance private sector cleanup of brownfields by enabling parties to remediate sites using private rather than public funds and to reduce the development pressures on "greenfields." This document is a summary of the information that can be found in the site-related reports and documents.

SECTION 2: CITIZEN PARTICIPATION

The Department seeks input from the community on all remedies. A public comment period was held, during which the public was encouraged to submit comment on the proposed remedy. All comments on the remedy received during the comment period were considered by the Department in selecting a remedy for the site. Site-related reports and documents were made available for review by the public at the following document repositories:

Wadsworth Library
Attn: Anna Grace
24 Center Street
Geneseo, NY 14454
Phone: 585.243.0440

New York State Department of Environmental Conservation
Attn: Ms. Linda Vera
6274 East Avon-Lima Road
Avon, NY 14414
Phone: 585.226.2466

Receive Site Citizen Participation Information By Email

Please note that the Department's Division of Environmental Remediation (DER) is "going paperless" relative to citizen participation information. The ultimate goal is to distribute citizen participation information about contaminated sites electronically by way of county email listservs. Information will be distributed for all sites that are being investigated and cleaned up in a particular county under the State Superfund Program, Environmental Restoration Program, Brownfield Cleanup Program, Voluntary Cleanup Program, and Resource Conservation and Recovery Act Program. We encourage the public to sign up for one or more county listservs at <http://www.dec.ny.gov/chemical/61092.html>

SECTION 3: SITE DESCRIPTION AND HISTORY

Location: The Geneseo Park Street former Manufactured Gas Plant (MGP) site is located at 4 and 6 Park Street in the Village of Geneseo, Livingston County, New York. The former gas works operations covered approximately $\frac{3}{4}$ of an acre that was located on what is now the eastern side of the State University of New York (SUNY) Geneseo campus.

Site Features: Most of the area occupied by the site is currently paved and also includes a small landscaped area.

Current Zoning and Land Use: The site is currently owned by SUNY and is a campus entrance that includes a small landscaped area and a parking lot. The site is zoned for residential use (R-1). The surrounding parcels and uses include commercial buildings and School Street to the north; a SUNY academic building complex (the Brodie Fine Arts building) to the west; Park Street to the south; and a SUNY parking lot and commercial buildings along the west side of Main Street to the east of the site.

Past Use of the Site: A MGP operated at the site from 1860 through 1906. The Plant operated as a coal carbonization facility. The MGP related structures including the gas holder were demolished and removed from the site by 1913. Other subsequent uses include a paint shop, electric generating plant and a hardware store.

A source removal action was completed at the site between September 2002 and January 2003, after SUNY acquired the properties and began activities to build a parking lot. A stone/brick underground containment structure, approximately 800 tons of MGP-impacted soil, and 3,200 gallons of impacted water that accumulated in the excavation were excavated and properly disposed of off-site. The final excavation depth was 20 feet below ground surface (bgs), terminating at the top of fractured bedrock. An area near the center of the excavation was excavated an additional five feet into fractured bedrock to approximately 25 feet bgs. The excavation was backfilled with material that met structural requirements, the landscaped areas and sidewalks were constructed, and the remaining area of the site was paved.

Site Geology and Hydrogeology: Site geology consists of fill material ranging from about two feet to nine feet bgs. Beneath the fill is a medium to very dense till unit with varying amounts of clay and gravel from approximately two to 14.5 feet bgs. Bedrock at the site is shale with a

weathered bedrock surface observed from approximately eight to 18.5 feet bgs. The depth to groundwater at the site is approximately 10 to 15 feet bgs and flows west-northwest, in the direction of the Genesee River.

A site location map is attached as Figure 1.

SECTION 4: LAND USE AND PHYSICAL SETTING

The Department may consider the current, intended, and reasonably anticipated future land use of the site and its surroundings when evaluating a remedy for soil remediation. For this site, at a minimum, alternatives (or an alternative) that restrict(s) the use of the site to restricted-residential use (which allows for commercial use and industrial use) as described in DER-10, Technical Guidance for Site Investigation and Remediation were/was evaluated.

A comparison of the results of the Remedial Investigation (RI) to the appropriate standards, criteria and guidance values (SCGs) for the identified land use and the unrestricted use SCGs for the site contaminants is available in the RI Report.

SECTION 5: ENFORCEMENT STATUS

The voluntary cleanup agreement is with a Volunteer. If the Volunteer elects not to complete the remedial program under the VCP, the Department will make a determination if the site poses a significant threat to human health and the environment. If the site is determined to pose a significant threat, the Department will approach the potentially responsible parties (PRPs) to implement the remedy. PRPs are those who may be legally liable for contamination at a site. This may include past or present owners and operators, waste generators, and haulers.

The Department and Rochester Gas and Electric Corporation entered into an Amended and Restated Voluntary Cleanup Agreement (DEC Index No. B8-0535-98-07) dated December 23, 2014 to include this site. The agreement obligates Rochester Gas and Electric to implement a full remedial program for MGP-related contamination both on and off the site.

SECTION 6: SITE CONTAMINATION

6.1: Summary of the Remedial Investigation

A remedial investigation (RI) serves as the mechanism for collecting data to:

- characterize site conditions;
- determine the nature of the contamination; and
- assess risk to human health and the environment.

The RI is intended to identify the nature (or type) of contamination which may be present at a site and the extent of that contamination in the environment on the site, or leaving the site. The RI reports on data gathered to determine if the soil, groundwater, soil vapor, indoor air, surface water or sediments may have been contaminated. Monitoring wells are installed to assess

groundwater and soil borings or test pits are installed to sample soil and/or waste(s) identified. If other natural resources are present, such as surface water bodies or wetlands, the water and sediment may be sampled as well. Based on the presence of contaminants in soil and groundwater, soil vapor will also be sampled for the presence of contamination. Data collected in the RI influence the development of remedial alternatives. The RI report is available for review in the site document repository and the results are summarized in section 6.3.

The analytical data collected on this site includes data for:

- groundwater
- soil
- soil vapor

6.1.1: Standards, Criteria, and Guidance (SCGs)

The remedy must conform to promulgated standards and criteria that are directly applicable or that are relevant and appropriate. The selection of a remedy must also take into consideration guidance, as appropriate. Standards, Criteria and Guidance are hereafter called SCGs.

To determine whether the contaminants identified in various media are present at levels of concern, the data from the RI were compared to media-specific SCGs. The Department has developed SCGs for groundwater, surface water, sediments, and soil. The NYSDOH has developed SCGs for drinking water and soil vapor intrusion. For a full listing of all SCGs see: <http://www.dec.ny.gov/regulations/61794.html>

6.1.2: RI Results

The data have identified contaminants of concern. A "contaminant of concern" is a contaminant that is sufficiently present in frequency and concentration in the environment to require evaluation for remedial action. Not all contaminants identified on the property are contaminants of concern. The nature and extent of contamination and environmental media requiring action are summarized below. Additionally, the RI Report contains a full discussion of the data. The contaminant(s) of concern identified at this site is/are:

benzene	benzo(a)anthracene
toluene	benzo(a)pyrene
ethylbenzene	indeno(1,2,3-CD)pyrene
xylene (mixed)	

The contaminant(s) of concern exceed the applicable SCGs for:

- groundwater
- soil

6.2: Interim Remedial Measures

An interim remedial measure (IRM) is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before issuance of the Decision Document.

There were no IRMs performed at this site during the RI.

6.3: Summary of Environmental Assessment

This section summarizes the assessment of existing and potential future environmental impacts presented by the site. Environmental impacts may include existing and potential future exposure pathways to fish and wildlife receptors, wetlands, groundwater resources, and surface water. The RI report presents a detailed discussion of any existing and potential impacts from the site to fish and wildlife receptors.

Nature and Extent of Contamination: Soil and groundwater were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs) and metals. Based upon investigations conducted to date, the primary contaminants of concern at the site include VOCs and SVOCs.

Soil - Volatile organic compounds (VOCs), specifically benzene up to 6 parts per million (ppm)(restricted residential soil cleanup objective (RRSCO)of 4.8 ppm), toluene up to 6.1 ppm (unrestricted soil cleanup objective (URSCO) of 0.7 ppm), ethylbenzene up to 5.9 ppm (URSCO of 1), and xylenes up to 14 ppm (URSCO of 0.26 ppm)(BTEX), were detected at concentrations exceeding the unrestricted and/or restricted residential SCOs in soil samples collected at the site. Total BTEX concentrations in these samples ranged from 1.47 parts per million (ppm) to 16.6 ppm at depths ranging from five feet bgs to 14 feet bgs. No surface soil samples were obtained as most of the site is covered by pavement, sidewalks, and landscaped areas that were constructed after the source removal action.

Concentrations of total semi-volatile organic compounds (SVOCs) ranged from non-detect to 741 ppm. SVOCs including naphthalene up to 160 ppm (RRSCO of 100 ppm) and phenanthrene up to 140 ppm (RRSCO of 100 ppm) exceeded the restricted residential use SCOs in one location at a depth of five to seven feet bgs. Benzo(a)anthracene up to 36 ppm (RRSCO of 1 ppm), benzo(a)pyrene up to 30 ppm (RRSCO of 1 ppm), benzo(b)fluoranthene up to 32 ppm (RRSCO of 1 ppm), dibenzo(a,h)anthracene up to 5 ppm (RRSCO of 0.33 ppm), and indeno(1,2,3-cd)pyrene up to 15 ppm (RRSCO of 0.5 ppm)were detected at depths ranging from five feet bgs to 14 feet bgs with concentrations exceeding the restricted residential use SCOs.

Non-aqueous phase liquid (NAPL) was identified within the weathered bedrock at one location located immediately west of the former excavation area. NAPL was not detected north or south of this area.

Data does not indicate any off-site impacts in soil related to this site.

Groundwater - Benzene up to 5.8 parts per billion (SCG of 1 ppb), toluene up to 4.9 ppb (SCG of 5 ppb), ethylbenzene up to 6.2 ppb (SCG of 5 ppb) and Xylene up to 30 ppb (SCG of 5 ppb) were found in groundwater collected from wells on the western portion of the site at concentrations just slightly above the groundwater standards. BTEX concentrations ranged from non-detect to 45 ppb. SVOCs were not detected in groundwater at levels above the groundwater standards. Data does not indicate any off-site impacts in groundwater related to this site.

Soil vapor - Soil vapor samples were collected from seven locations around the vicinity of the former MGP structures on- and off-site. Concentrations of VOCs were detected in soil vapor samples collected; however, no evidence of MGP impacts exist in the soil vapor. The highest level of BTEX detected was 104 micrograms per cubic meter ($\hat{\text{A}}\mu\text{g}/\text{m}^3$) at SV-3. Chlorinated compounds were also detected, with the highest level being 38 $\hat{\text{A}}\mu\text{g}/\text{m}^3$ of tetrachloroethene.

There is no evidence of off-site impact in any of the environmental media resulting from the operation of the former MGP site.

6.4: Summary of Human Exposure Pathways

This human exposure assessment identifies ways in which people may be exposed to site-related contaminants. Chemicals can enter the body through three major pathways (breathing, touching or swallowing). This is referred to as *exposure*.

Persons who dig below the ground surface may come into contact with contaminants in subsurface soil. People are not drinking the contaminated groundwater because the area is served by a public water supply that is not affected by this contamination.

6.5: Summary of the Remediation Objectives

The objectives for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375. The goal for the remedial program is to restore the site to pre-disposal conditions to the extent feasible. At a minimum, the remedy shall eliminate or mitigate all significant threats to public health and the environment presented by the contamination identified at the site through the proper application of scientific and engineering principles.

The remedial action objectives for this site are:

Groundwater

RAOs for Public Health Protection

- Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards.
- Prevent contact with, or inhalation of volatiles, from contaminated groundwater.

RAOs for Environmental Protection

- Restore ground water aquifer to pre-disposal/pre-release conditions, to the extent practicable.
- Prevent the discharge of contaminants to surface water.

- Remove the source of ground or surface water contamination.

Soil

RAOs for Public Health Protection

- Prevent ingestion/direct contact with contaminated soil.
- Prevent inhalation of or exposure from contaminants volatilizing from contaminants in soil.

RAOs for Environmental Protection

- Prevent migration of contaminants that would result in groundwater or surface water contamination.

Soil Vapor

RAOs for Public Health Protection

- Mitigate impacts to public health resulting from existing, or the potential for, soil vapor intrusion into buildings at a site.

SECTION 7: ELEMENTS OF THE SELECTED REMEDY

The alternatives developed for the site and the evaluation of the remedial criteria are presented 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 selected remedy is referred to as the Coal Tar Recovery and Site Monitoring with Institutional Controls remedy.

The elements of the selected remedy, as shown in Figure 2, are as follows:

1. A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows;

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse gases and other emissions;
- Increasing energy efficiency and minimizing use of non-renewable energy;
- Conserving and efficiently managing resources and materials;
- Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;
- Maximizing habitat value and creating habitat when possible;
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- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.

2. A site cover currently exists in areas not occupied by buildings and will be maintained to allow for restricted residential use of the site. Any site redevelopment will maintain the existing site cover. The site cover may include paved surface parking areas, sidewalks or soil where the upper two feet of exposed surface soil meets the applicable soil cleanup objectives (SCOs) for restricted residential use. Any fill material brought to the site will meet the requirements for the identified site use as set forth in 6NYCRR part 375-6.7(d).

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4. Institutional Control

Imposition of an institutional control in the form of an environmental easement for the controlled property which will:

- require the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8(h)(3);
- allow the use and development of the controlled property for restricted residential uses as described in Part 375-1.8(g)(2)(iii) and industrial uses as described in Part 375-1.8(g)(2)(iv), although land use is subject to local zoning laws;
- restrict the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County DOH; and
- require compliance with the Department approved Site Management Plan.

5. Site Management Plan

A Site Management Plan is required, which includes the following:

- a) An Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective:

Institutional Controls: The Environmental Easement discussed in Paragraph 4 above.

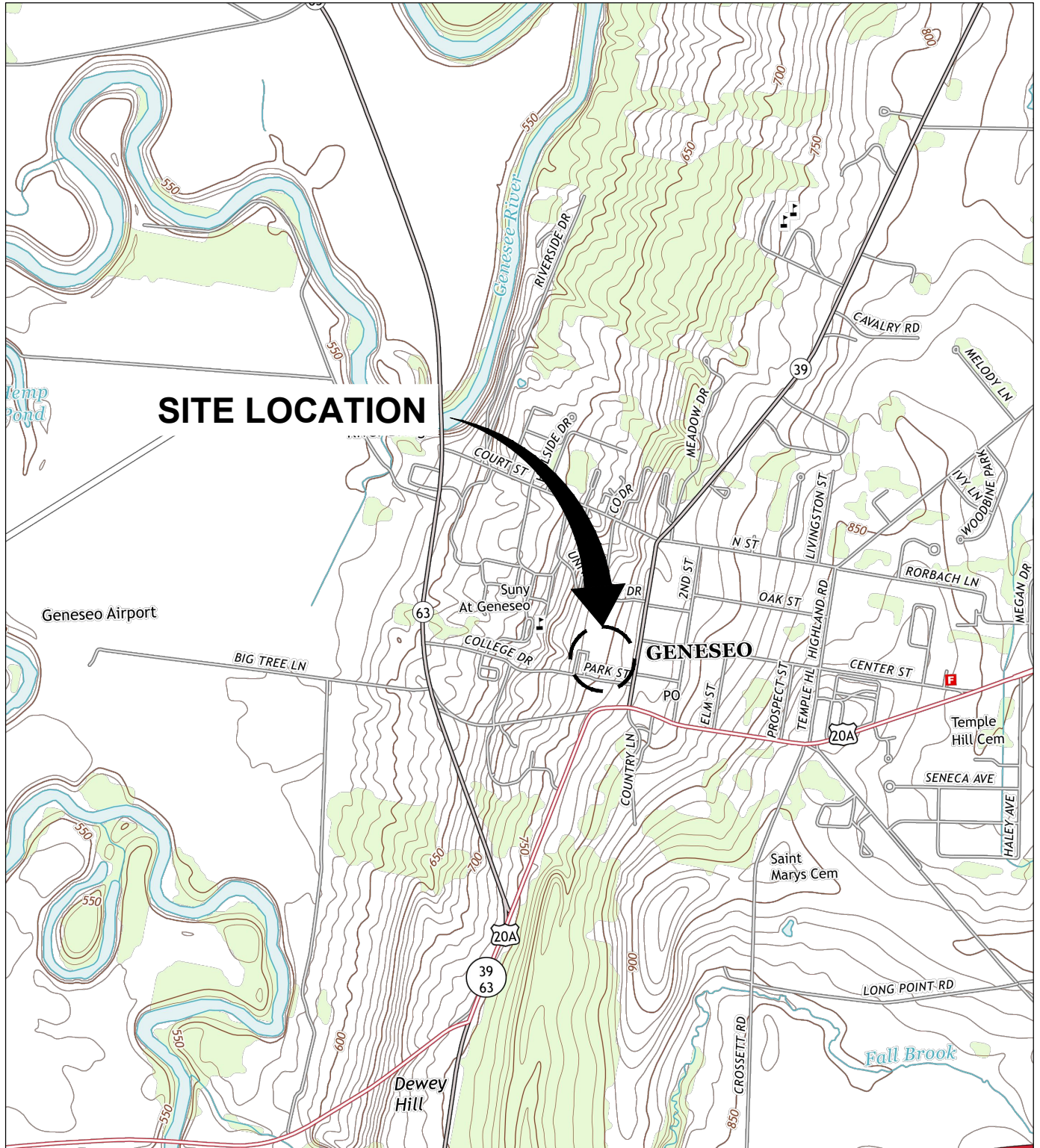
Engineering Controls: The site cover and coal tar recovery well discussed in Paragraphs 2 and 3 above.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;

- descriptions of the provisions of the deed restriction including any land use and groundwater use restrictions;
 - a provision for evaluation of the potential for soil vapor intrusion for future buildings developed on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
 - a provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in Paragraph 2 above will be placed in any areas where the upper two feet of exposed surface soil exceed the applicable SCOs;
 - provisions for the management and inspection of the identified engineering controls;
 - maintaining site access controls and Department notification; and
 - the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.
- b) A Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:
- monitoring of groundwater to assess any change in the current conditions;
 - schedule of monitoring and frequency of submittals to the Department; and
 - monitoring for vapor intrusion for any buildings, as may be required by the Institutional and Engineering Control Plan discussed above.
- c) The Site Management Plan will be subject to an agreement between Rochester Gas and Electric Corporation and the property owner for site access and any other pertinent provisions to enable the maintenance of cover systems, management of remaining contamination, excavation, inspections, sampling, and/or any other requisite activities.

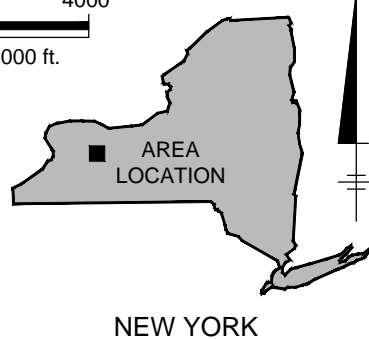
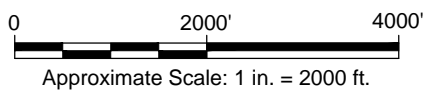
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SITE LOCATION

GENESEO

REFERENCE: BASE MAP USGS 7.5 MIN. TOPO. QUAD., GENESEO, NY, 2013



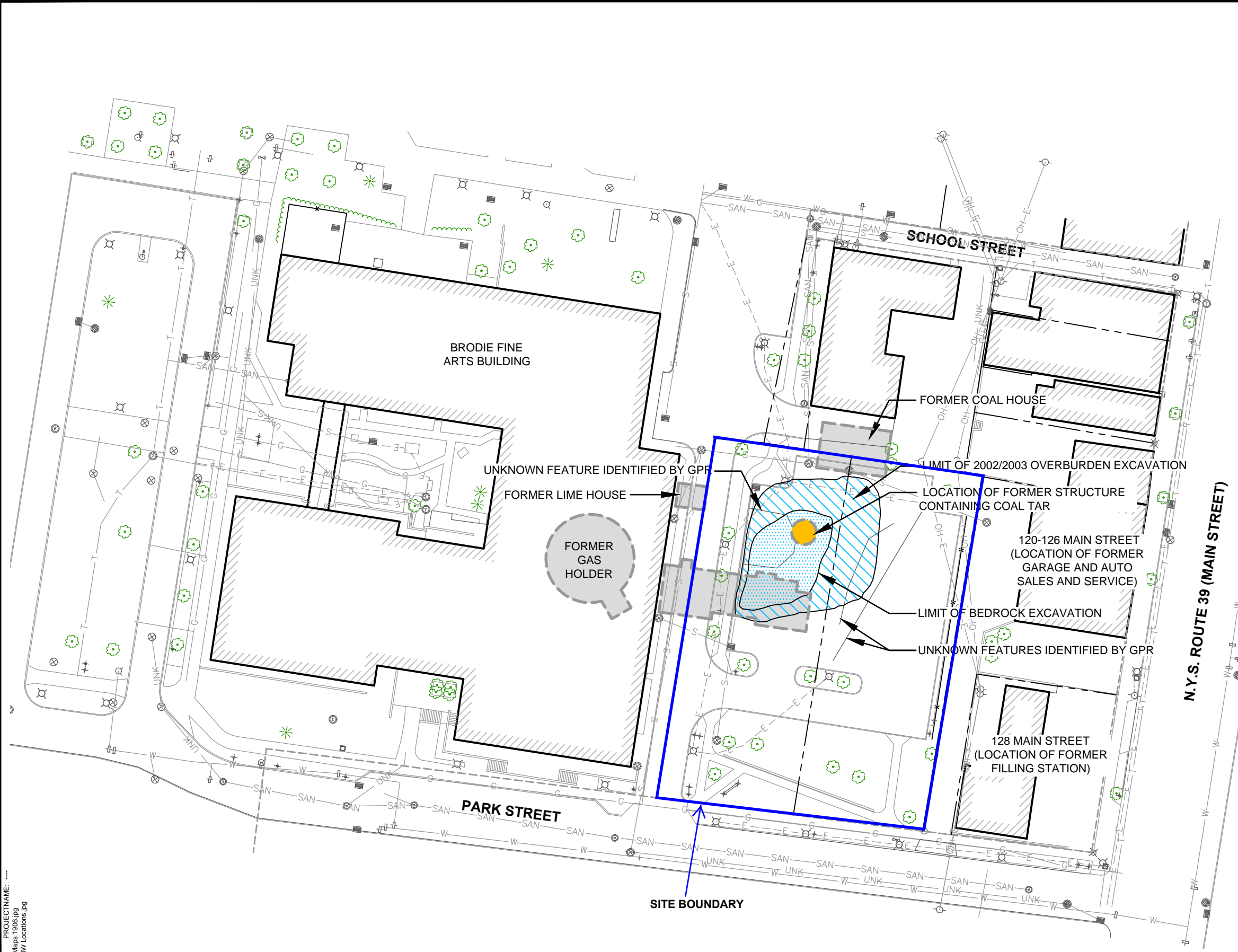
ROCHESTER GAS & ELECTRIC
 PARK STREET FORMER MGP SITE
SITE CHARACTERIZATION REPORT

SITE LOCATION MAP



FIGURE
1

CITY:CRANBURY,NJ DIV:GROUP:ENVCAD DB:JMEYER LD:JMEYER PIC:KWHITE PNB:AHRENS TMB:AHRENS LVR:OPTION--OFF--REF
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 SB and MW Locations.jpg

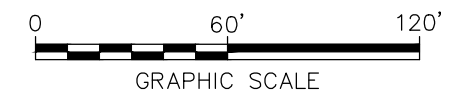


LEGEND:

	PROPERTY LINE
	RIGHT-OF-WAY LINE
	BUILDING LINE
	FENCE LINE
	VEGETATION
	SANITARY SEWER LINE
	STORM SEWER LINE
	WATER LINE
	OVERHEAD ELECTRIC LINE
	UNDERGROUND ELECTRIC LINE
	NATURAL GAS LINE
	OVERHEAD TELEPHONE & CABLE LINE
	TELEPHONE & CABLE LINE
	UNKNOWN UTILITY
	FORMER MGP STRUCTURE
	LIMITS OF BEDROCK EXCAVATION
	LIMITS OF OVERBURDEN EXCAVATION
	FORMER STONE/BRICK STRUCTURE CONTAINING COAL TAR

- NOTES:**
1. FORMER LOCATIONS OF GAS WORKS STRUCTURES FROM SANBORN LIBRARY, LLC 1906 MAP. LOCATIONS ARE APPROXIMATE.
 2. LIMITS OF THE 2002/2003 OVERBURDEN EXCAVATION, BEDROCK EXCAVATION, AND LOCATIONS OF THE FORMER STRUCTURE CONTAINING COAL TAR FROM REPORT OF ACTIVITIES AT LL-L0T, SUNY GENESEO (2003). LOCATIONS ARE APPROXIMATE.
 3. GROUND PENETRATING RADAR SURVEY AND UTILITY LOCATION PERFORMED BY UNDERGROUND SERVICES JULY 2015.

- SOURCE:**
1. BASEMAP INFORMATION PROVIDED BY FISHER ASSOCIATES, LLC. DATED JUNE, 2015. FILENAME: GENESEO TOPO.DWG. GEOREFERENCED TO NEW YORK STATE PLANE NAD83 COORDINATE SYSTEM.



ROCHESTER GAS & ELECTRIC
 PARK STREET FORMER MGP SITE
SITE CHARACTERIZATION REPORT

SITE MAP

ARCADIS

FIGURE
2