RECORD OF DECISION

Xerox - Building 209
Site No. 828068
Xerox - Building 201
Site No. 828080
Xerox - Nursery Area (Building 119)
Site No. 828083
State Superfund Project
Webster, Monroe County
March 2016

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

DECLARATION STATEMENT - RECORD OF DECISION

Xerox - Building 209
Site No. 828068
Xerox - Building 201
Site No. 828080
Xerox - Nursery Area (Building 119)
Site No. 828083
Webster, Monroe County
March 2016

Statement of Purpose and Basis

This document presents the remedy for the above referenced sites, all Class 2 inactive hazardous waste disposal sites. The remedial program was chosen in accordance with the New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR) Part 375, and is not inconsistent with the National Oil and Hazardous Substances Pollution Contingency Plan of March 8, 1990 (40CFR300), as amended.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the above referenced sites and the public's input to the proposed remedy presented by the Department. A listing of the documents included as a part of the Administrative Record is included in Appendix B of the ROD.

Description of Selected Remedy

During the course of the investigation certain actions, known as interim corrective measures (ICMs), were undertaken at the above referenced sites. An ICM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the Record of Decision. The ICM(s) undertaken at these sites are discussed in Section 6.2.

Based on the implementation of the ICM(s), the findings of the investigation of this site indicate that the site no longer poses a threat to human health or the environment; therefore No Further Action is the selected remedy. The remedy may include continued operation of a remedial system if one was installed during the ICM and the implementation of any prescribed institutional controls/engineering controls (ICs/ECs) that have been identified as being part of the remedy for the site.

The ICM(s) conducted at the site attained the remediation objectives identified for this site in Section 6.5 for the protection of public health and the environment.

New York State Department of Health Acceptance

The New York State Department of Health (NYSDOH) concurs that the remedy for this site is protective of human health.

Declaration

The selected remedy is protective of human health and the environment, complies with State and Federal requirements that are legally applicable or relevant and appropriate to the remedial action to the extent practicable, and is cost effective. This remedy utilizes permanent solutions and alternative treatment or resource recovery technologies, to the maximum extent practicable, and satisfies the preference for remedies that reduce toxicity, mobility, or volume as a principal element.

March 31, 2016

Date

Robert W. Schick, P.E., Director
Division of Environmental Remediation

RECORD OF DECISION

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Site No. 828068
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March 2016

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 sites. The disposal of hazardous wastes at these sites resulted in threats to public health and the environment that were addressed by actions known as interim corrective measures (ICMs), which were undertaken at these sites. An ICM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the Record of Decision. The ICMs undertaken at these site are discussed in Section 6.2.

Based on the implementation of the ICM(s), the findings of the investigation of the above referenced sites indicate that these sites no longer poses a threat to human health or the environment. The ICM(s) conducted at the sites attained the remediation objectives identified for this site, which are presented in Section 6.5, for the protection of public health and the environment. No Further Action is the remedy selected by this Record of Decision (ROD). A No Further Action remedy may include site management, which will include continued operation of any remedial system installed during the ICM and the implementation of any prescribed controls that have been identified as being part of the remedy for the sites. This ROD identifies the ICM(s) conducted and discusses the basis for No Further Action.

The New York State Inactive Hazardous Waste Disposal Site Remedial Program (also known as the State Superfund Program) is an enforcement program, the mission of which is to identify and characterize suspected inactive hazardous waste disposal sites and to investigate and remediate those sites found to pose a significant threat to public health and environment.

The Department has issued this document in accordance with the requirements of New York State Environmental Conservation Law and 6 NYCRR Part 375. 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 sites. Site-related reports and documents were made available for review by the public at the following document repository:

NYSDEC Region 8 Headquarters
6274 East Avon-Lima Road
Avon, NY 14414
585-226-2466

A public meeting was also conducted. At the meeting, the findings of the remedial investigation were presented along with a summary of the proposed remedy. After the presentation, a question-and-answer period was held, during which verbal or written comments were accepted on the proposed remedy.

Comments on the remedy received during the comment period are summarized and addressed in the responsiveness summary section of the ROD.

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

These three class 2 state superfund sites are part of the much larger Xerox RCRA Facility which is managed as site number 828178.

Location: The Xerox Corporation, Joseph C. Wilson Center for Technology (facility), is located on Phillips Road in the Town of Webster, New York. The 780 acre facility is located between Schlegel Road to the north, Basket Road to the east, Conrail Railroad tracks along U.S. Route 104 to the south and Webster Road to the west.

Site Features: The main facility features include several dozen large occupied and unoccupied industrial and office buildings and paved parking areas. The facility also includes the following building and surrounding areas which comprise the class 2 sites which are the subject of this document:

Xerox - Building 209, Site #828068; this 2.5 acre site consists of Building 209 and the land in the immediate vicinity. Building 209 being the center of the site is bounded to the north by Mitcheldean Drive, to the west by Building 208, to the south by Building 143 and to the east by Building 213.

Xerox - Building 201, Site #828080; this 5.8 acre site consists of Building 201 and the land in the immediate vicinity. Building 201 being the center of the site is bounded to the north by Venray Drive, to the west by Building 102 and 335, to the south by Seine Drive and to the east by Euston Road.

Xerox - Nursery Area (Building 119), Site #828083; This 2.0 acre site is located within the Xerox Corporation's Webster facility on the south side of San Jose Boulevard across from Building 119.

Current Zoning and Land Use: The current zoning of the facility is industrial. Current use of the facility involves research and development, manufacturing and/or refurbishing of electrostatic copying machines, manufacturing associated consumable materials (toner), and customer support services. The Xerox Webster Facility is permitted under the NYSDEC Resource Conservation and Recovery Act (RCRA) Program as a hazardous waste storage facility and holds (RCRA) Hazardous Waste Management Permit No. 8-2654-00064/00040.

Past Use of the Site: The Xerox Webster Facility has been a main Xerox manufacturing location since the 1960s. The central portion of the Facility was first developed in 1956. The oldest building is Building 201, which was constructed in 1956 and was initially used as a support facility for the Rochester operations of the Haloid Company, the predecessor to the Xerox Corporation. Prior to 1956 the property was farmland.

Site Geology and Hydrogeology: Groundwater at the site is shallow, 5-15 feet below ground. Clayey soils overlie shallow bedrock (5-15 feet deep). Groundwater flow is to the north by northwestern direction towards Lake Ontario.

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 sites and the surroundings when evaluating a remedy for soil remediation. For these sites, alternatives (or an alternative) that restrict(s) the use of the sites to commercial use (which allows for industrial use) as described in Part 375-1.8(g) is/are being evaluated in addition to an alternative which would allow for unrestricted use of the site.

SECTION 5: ENFORCEMENT STATUS

The facility holds a 6NYCRR Part 373 Hazardous Waste Management Permit which includes provisions for RCRA Corrective Action. The corrective action requirement requires owners and/or operators of hazardous waste treatment, storage and disposal facilities to investigate and,

when appropriate, remediate releases of hazardous wastes and/or constituents to the environment. In relation to this facility, the Department issued a Part 373 Hazardous Waste Management Permit (DEC #8-2654-00064/00040) to Xerox on April 12, 2012. Through the RCRA Corrective Action Program, the remedial party has addressed the obligations of the Inactive Hazardous Waste Disposal Site Remedial Program and 6 NYCRR Part 375, for the sites subject to this document.

SECTION 6: SITE CONTAMINATION

6.1: Summary of the Remedial Investigation

The remedial process began with investigations to evaluate potential areas of the facility that may have been impacted by hazardous wastes and/or hazardous constituents. Based on the results of investigations, the Department has determined that hazardous wastes and/or hazardous constituents have been released at the facility. The impact of releases of hazardous wastes and/or hazardous constituents at the facility were characterized and evaluated. The three areas of the facility which are the subject of this document were listed on the Registry of Inactive Hazardous Waste Disposal sites.

The analytical data collected on this site includes data for:

- groundwater
- soil
- soil vapor
- indoor air
- sub-slab 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. The tables found in Exhibit A list the applicable SCG in the footnotes. For a full listing of all SCGs see: http://www.dec.ny.gov/regulations/61794.html

6.1.2: Results

The data have identified contaminants of concern. A "contaminant of concern" is a hazardous waste 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 contaminant(s) of concern identified at the sites is/are:

1,1,1-Trichloroethane	Trichloroethene (TCE)
1,1-Dichloroethane	Vinyl Chloride
cis-1,2-Dichloroethene	
Tetrachloroethylene (PCE)	

Based on the investigation results, comparison to the SCGs, and the potential public health and environmental exposure routes, certain media and areas of the site required remediation. These media were addressed by the ICM(s) described in Section 6.2. More complete information can be found in the RCRA Corrective Measures Study (CMS).

6.2: Interim Remedial Measures

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

The following ICM(s) has/have been completed at this site based on conditions observed during the investigations.

ICM - Investigative Site 209 (Site #828068)

Two Solid Waste Management Units (SWMUs) have been identified at Investigative Site 209. These are the W209 AP-67-A Recirculation Tanks (SWMU # 55) and the W209 AP-67-A Storage Tanks (SWMU # 57). Releases from these units resulted in VOC contaminated soil and groundwater. A dual phase vacuum extraction (DPVE) system, consisting of 28 extraction wells with treatment, was operated from 1992 until 2003. With this technology, the water phase was separated and directed for treatment with the groundwater recovered from the pumping well system and the vapor was treated by passing the stream through granulated activated carbon units prior to discharge. A total of approximately 25,000 pounds of contaminant mass was removed from the Building 209 Investigative Site. The contaminant plume is now controlled, although parts per million (ppm) levels of VOCs remain in the groundwater largely in fractured bedrock. The Building 200/208 Migration Control Trench is located down gradient of the Building 209 area that prevents groundwater contamination form migrating beyond this area. Groundwater is monitored and tracked under the Site-Wide Closure Strategy and the Sampling and Analysis plan.

ICM - Investigative Site W119 (Site #828083)

Investigative activities identified the presence of VOCs in soil and groundwater in the shallow bedrock zone. A DPVE system, consisting of eight wells and treatment, was implemented in 1992. With this technology, the water phase was separated and directed for treatment with the groundwater recovered from the pumping well system and the vapor was treated by passing the stream through granulated activated carbon units prior to discharge. A total of approximately 500 pounds of contaminant mass was removed from the Building 119 area from December 1992 through October 1996. The DPVE system was operated until it was determined that the system had removed contaminants present in soil and groundwater to the extent practical. The operation

of the system was discontinued in 1997 with approval from the Department. Although there are still significant concentrations of VOCs, present in the soil and groundwater, the concentrations are stable and the Building 200/208 Migration Control Trench, which is located down gradient from Building 119, prevents groundwater contamination from migrating beyond this area. Groundwater contamination associated with Investigative Site W119 is monitored and tracked under the Site-Wide Closure Strategy and the Sampling and Analysis Plan.

ICM - Investigative Site W201/206/218 (Site #828080)

The following SWMUs have been designated as part of Investigative Site W201/206/218:
1) W201 Chrome Seepage (SWMU #74)
2) W201 TCE Spill (SWMU # 77)
3) W218 Utility Vault (SWMU # 85)
4) W206 Contamination (SWMU # 86)
5) Manhole Number 35 (SWMU # 100)
6) Building 313 Contamination (SWMU #101)

Chlorinated VOCs and their associated breakdown products have been identified in groundwater and soil in the 201/206/218 area. Elevated levels of total chromium and nickel have also been detected in the Building 201 area soils. Chromium and nickel contaminated soil was excavated in 2000. Residual contamination is managed under the approved site wide soil management plan. VOC concentrations in the intermediate and deep rock zones are limited to isolated detections beneath source areas. The Building 201 area is the likely source of the groundwater plume under Building 206. A DPVE system was operated in the 201/206/218 area from 1988 until 1999. During the operation of the system 6,230 pounds of contaminant mass (including vapor phase removed from vadose zone soils and groundwater extracted from the hydrostratigraphic units identified at the site) was removed. Operation of the system was discontinued, with approval from the Department, after it was determined that the system had removed contaminants present in soil and groundwater to the extent practical. Currently, as part of the Side-Wide Closure Strategy, a blasted bedrock groundwater collection trench is capturing groundwater on Xerox property near the intersection of Phillips Road and Mitcheldean Drive, downgradient of the 201/206/218 contaminant source areas. Groundwater is monitored and tracked under the Site-Wide Closure Strategy and the Sampling and Analysis Plan.

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.

Based upon the resources and pathways identified and the toxicity of the contaminants of ecological concern at this site, a Fish and Wildlife Resources Impact Analysis (FWRIA) was deemed not necessary.

These sites are part of the Xerox RCRA Facility and are managed under site code 828178.

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 828178 site CMS report presents more a detailed discussion of any existing and potential impacts from the site.

Nature and Extent of Contamination:

Groundwater: Based upon investigations conducted to date, the primary contaminants of concern for this facility within its boundaries, are chlorinated volatile organic compounds (VOCs), which include tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2-dichloroethene (cis- 1,2-DCE), vinyl chloride (VC), 1,1,1-trichloroethane (1,1,1-TCA), and 1,1-dichloroethane (1,1-DCA). Figure 5 shows the maximum total target volatiles detected during the latest groundwater sampling in 2013. Source area ICMs have been completed, with Department approval, to remove contaminant sources and plumes to the extent practical. The remaining VOC contaminated groundwater, at parts per million (ppm) levels, largely resides in fractured bedrock as multiple plumes within the facility boundaries. Groundwater remediation for the facility is currently implemented under the Site Wide Closure Strategy, which hydraulically contains the contaminated groundwater and prevents it from migrating off-site. Groundwater is extracted from a series of groundwater recovery wells, treated, and/or discharged to the sanitary sewer systems. Groundwater recovery has been enhanced with a series of blasted bedrock trenches that span the areas north, west, and east of the plant, near or downgradient of the contaminant source areas, with most of the recovery wells being located within the bedrock trenches (Figure 3).

Soil: Delineation of the extent of soil contamination was completed during on-site investigation activities. Subsequent to the completion of the facility investigation activities, impacted soil-related ICMs were implemented site-wide, which included excavation of identified impacted areas for management in accordance with the approved soil management plan and the past operation of the DPVE. Levels of 1,1,1 trichloroethane, tetrachloroethene and trichloroethene are present in on-site, subsurface soils at levels above soil cleanup objectives (SCOs) for commercial use.

Soil Vapor, Indoor Air Quality and Sub-Slab Soil Vapor: VOC concentrations were assessed in twelve on-site buildings (102, 118, 119, 120, 121, 130, 141, 143, 200, 201, 206, 208, 209, 212, 214, 223, 224, 225 and 317) and a sub-slab soil vapor investigation was completed in Building 221. In general investigations were performed to determine the extent of soil vapor/SVI concerns within the facility boundary. The only buildings that required additional sampling were buildings 201, 209 and 212. The remaining nine buildings require no additional sampling. Concentrations of VOCs found in the indoor air of Building 209 and Building 212 are within typical background concentrations. However, due to the use of these buildings as office space, the concentrations of trichloroethene found in the sub-slab vapor at these buildings and the proximity of these building to a potential subsurface source area, further monitoring of these buildings will continue. Also, while concentrations of most of the VOCs found in the indoor air of Building 201 are within typical background concentrations, trichloroethene and dichlorobenzene were found at levels above typical background concentrations. Based on the use of the building as office space, the concentrations of VOCs found in the indoor air and sub-slab

vapor and the proximity of potential subsurface source areas, further monitoring of this building will continue. As with contaminated groundwater, soil vapor contamination is contained on-site.

6.4: Summary of Human Exposure Pathways

People are not drinking the contaminated groundwater because the area is served by a public water supply that obtains its water from a different source. Since the site is covered with pavement and buildings, people are not likely to come into contact with site-related soil contamination unless they dig below the surface. Volatile organic compounds in the soil may move into the soil vapor (air spaces within the soil), which in turn may move into overlying buildings and affect the indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings is referred to as soil vapor intrusion. Environmental sampling has identified impacts associated with soil vapor intrusion at on-site buildings and actions have been taken, where needed, to address potential exposure. Environmental sampling indicates soil vapor intrusion is not a current concern for off-site buildings.

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: SUMMARY OF SELECTED REMEDY

Based on the results of the investigations and the ICMs conducted the Department has selected No Further Action as the remedy, with the continued groundwater migration control pursuant to the Site-Wide Closure Strategy, the Sampling and Analysis Plan and the development of a Site Wide Management Plan for these sites.

The components of the selected remedy include:

1. Green remediation principals and techniques will be implemented to the extent feasible in the 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 gas and other emissions;
• Increasing energy efficiency and minimizing use of non-renewable energy;
• Conserving and efficiently managing resources and materials; and
• Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste.

2. Continued operation of the site-wide groundwater migration control and treatment measures. Existing Blasted Bedrock Trenches (BBT) and selected groundwater recovery wells collect groundwater for treatment, with rates actively managed to capture dissolved phase contaminants and reduce potential for plume movement and meet the required groundwater quality standards at a previously established Line of Compliance. Recovered groundwater is discharged to either the local POTW or treated on-site in accordance with limits established by the New York State Pollutant Discharge Elimination System (SPDES) program prior to discharge to the Facility storm sewer network.

3. A site cover exists in all areas determined to have levels of contaminants in soil above commercial SCOs. These covers will be maintained to allow for commercial use of the site. Any site redevelopment will maintain a site cover, which may consist either of the structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper one foot of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where a soil cover is required it will be a minimum of one foot of soil, meeting the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d) for commercial use. The soil cover will be placed over a demarcation layer, with the upper six inches of the soil of sufficient quality to maintain a vegetation layer. Any fill material brought to the site will meet the requirements for the identified site use as set forth in 6 NYCRR Part 375-6.7(d).

4. Imposition of an institutional control in the form of an environmental easement for the controlled property that:
• requires 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);
• allows the use and development of the controlled property for commercial uses as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
• restricts 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
• requires compliance with the Department approved Site Management Plan.

5. A Site Wide Management Plan that will incorporate the entire RCRA facility 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 above.
Engineering Controls: The site cover system, groundwater collection and treatment system and blasted bedrock trench system discussed above.

This plan includes, but may not be limited to:
• incorporation of the existing site soil management plan which details the provisions for management of future excavations in areas of remaining contamination;
• descriptions of the provisions of the Environmental Easement including any land use and groundwater use restrictions;
• a provision for evaluation of the potential for soil vapor intrusion should currently unoccupied on-site buildings become occupied and for any buildings developed on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
• 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 the performance and effectiveness of the remedy;
• a schedule of monitoring and frequency of submittals to the Department;
• continued monitoring for vapor intrusion for existing buildings and any buildings reoccupied or developed on the site, as may be required by the Institutional and Engineering
Control Plan discussed above; and
• incorporating the current Sampling and Analysis Plan (SAP) and any other sampling plans already in place.

c. an Operation and Maintenance (O&M) Plan to ensure continued operation, maintenance, optimization, monitoring, inspection, and reporting of any mechanical or physical components of the remedy. The plan includes, but is not limited to:

• compliance monitoring of treatment systems to ensure proper O&M as well as providing the data for any necessary permit or permit equivalent reporting;
• maintaining site access controls and Department notification; and
• providing the Department access to the site and O&M records.

APPENDIX A

Responsiveness Summary

RESPONSIVENESS SUMMARY

Xerox - Building 209
Site No. 828068
Xerox - Building 201
Site No. 828080
Xerox - Nursery Area (Building 119)
Site No. 828083
State Superfund Project
Webster, Monroe, New York

The Proposed Remedial Action Plan (PRAP) for the above referenced sites was prepared by the New York State Department of Environmental Conservation (the Department) in consultation with the New York State Department of Health (NYSDOH) and was issued to the document repositories on March 1, 2016. The PRAP outlined the remedial measure proposed for the contaminated soil and groundwater at the above referenced sites.

The release of the PRAP was announced by sending a notice to the public contact list, informing the public of the opportunity to comment on the proposed remedy.

A public meeting was held on March 16, 2016, which included a presentation of the remedial investigation for the above referenced sites as well as a discussion of the proposed remedy. The meeting provided an opportunity for citizens to discuss their concerns, ask questions and comment on the proposed remedy. These comments have become part of the Administrative Record for this site. The public comment period for the PRAP ended on March 30, 2016.

This responsiveness summary responds to all questions and comments raised during the public comment period. The following are the comments received, with the Department's responses:

COMMENT 1: Is “No Further Action” really “No Further Action?” Are you going to walk away from the site?

RESPONSE 1: The No Further Action with Site Management remedy recognizes that the remediation of the site has been completed by the interim corrective measures (ICMs) and that Site Management, Institutional Controls and Engineering Controls are all that is necessary to confirm the remedy’s effectiveness. This alternative maintains engineering controls which were part of the ICMs, and includes institutional controls in the form of an environmental easement and site management plan. The combined effect of the controls is to assure the remedy remains protective of public health and the environment.

COMMENT 2: What is a Class 4 site?

RESPONSE 2: This classification is assigned to a site that has been properly closed but that requires continued site management consisting of operation, maintenance and/or monitoring. Class

4 is appropriate for a site where remedial actions have been completed for all operable units, but the site has not necessarily been brought into compliance with standards, criteria, or guidance (e.g., a groundwater extraction and treatment system has been installed and is operating properly, but groundwater standards have not yet been achieved).

APPENDIX B

Administrative Record

Administrative Record

Xerox - Building 209
Site No. 828068
Xerox - Building 201
Site No. 828080
Xerox - Nursery Area (Building 119)
Site No. 828083
State Superfund Project
Webster, Monroe, New York

1. Proposed Remedial Action Plan for the Xerox – Building 209, Building 201 and Nursery Area (Building 119) sites, dated March, 2016, prepared by the Department.

2. Statement of Basis for the Xerox Webster - RCRA Facility, NYD002211324/ Site No.828178 dated March, 2015, prepared by the Department.

3. NYSDEC, Resource Conservation and Recovery Act (RCRA) Hazardous Waste Management Permit No. 8-2654-00064/00040, April, 2012.

4. "Soil Management Plan, Revised" December 2012, prepared by Haley & Aldrich of New York.

5. "Sampling and Analysis Plan" November 2012, prepared by Haley & Aldrich of New York.

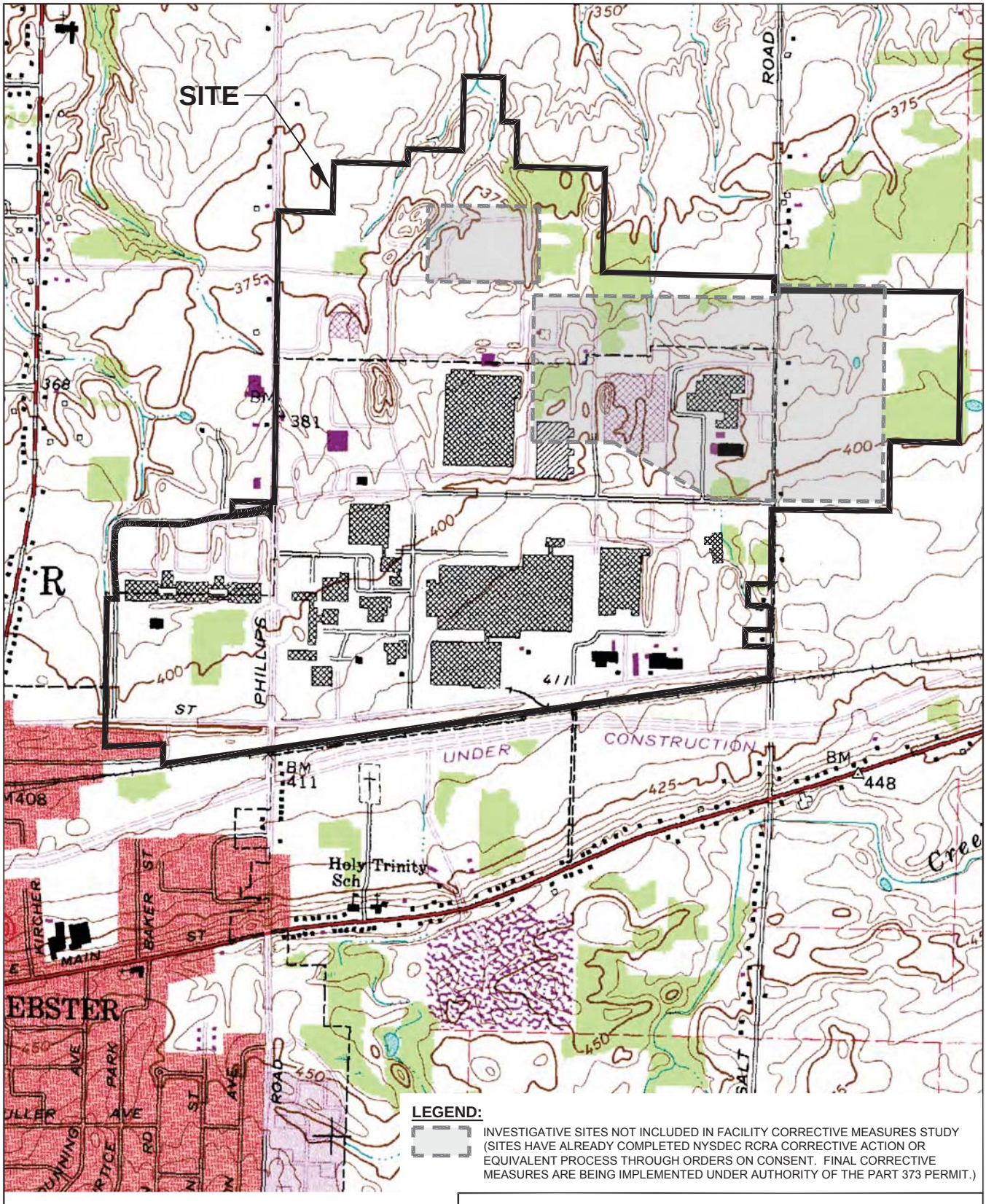
6. "RCRA Facility Investigation Final Report, Building 201/206/218," Volume I of II, September 1994, prepared by H&A of New York.

7. "RCRA Facility Investigation Final Report, Building 201/206/218," Volume II of II, September 1994, prepared by H&A of New York.

8. "Summary RCRA Facility Investigation (RFI) Report, Investigative Site W119," December 1993, prepared by Woodward-Clyde Consultants.

9. "RCRA Facility Investigation Final Report, Building 209 Investigative Site," Volume I of II, October 1993, prepared by H&A of New York.

10. "RCRA Facility Investigation Final Report, Building 209 Investigative Site," Volume I of II, October 1993, prepared by H&A of New York.



LEGEND:

INVESTIGATIVE SITES NOT INCLUDED IN FACILITY CORRECTIVE MEASURES STUDY (SITES HAVE ALREADY COMPLETED NYSDEC RCRA CORRECTIVE ACTION OR EQUIVALENT PROCESS THROUGH ORDERS ON CONSENT. FINAL CORRECTIVE MEASURES ARE BEING IMPLEMENTED UNDER AUTHORITY OF THE PART 373 PERMIT.)

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0 1500 3000
SCALE IN FEET

U.S.G.S. QUADRANGLE: WEBSTER, NEW YORK

HALEY & ALDRICH

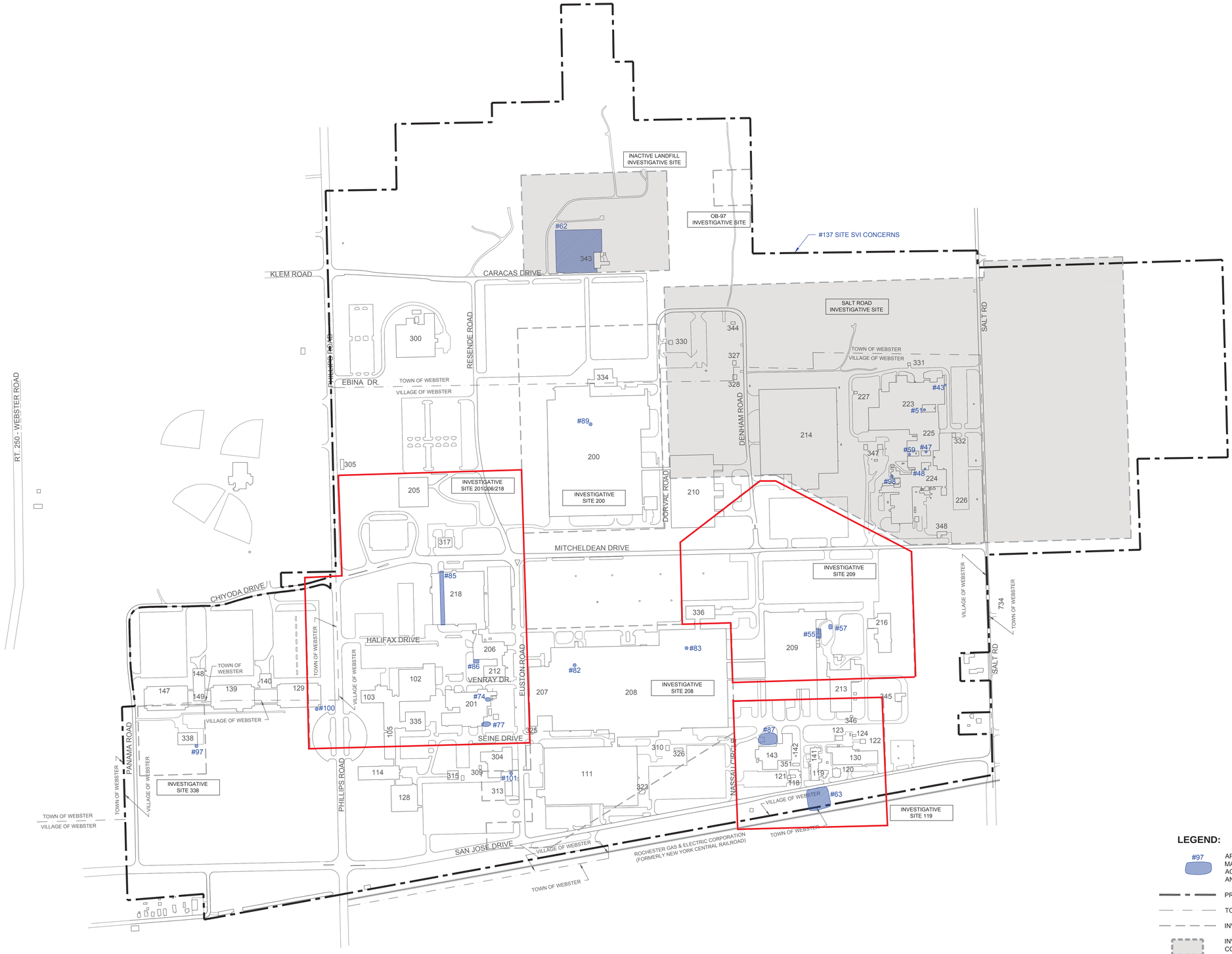
XEROX CORPORATION
WEBSTER, NEW YORK FACILITY
CORRECTIVE MEASURES STUDY

PROJECT LOCUS

SCALE: AS SHOWN
APRIL 2014

FIGURE 1

\\ROC\COMMON\XEROX\WEBSTER\FIGURES\CMS\2014\DRAWINGS\36909-117-0001-B01-PROJECT LOCUS.DWG



LEGEND:

- #97 — APPROXIMATE BOUNDARY OF SOLID WASTE MANAGEMENT UNITS (SWMUs) REQUIRING FURTHER ACTION & NUMBER. A FULL INVENTORY OF SWMUs AND CURRENT STATUS CAN BE FOUND IN THE FRD.
- PROPERTY BOUNDARY
- TOWN/VILLAGE LINE
- INVESTIGATIVE SITE BOUNDARIES
- INVESTIGATIVE SITES NOT INCLUDED IN FACILITY CORRECTIVE MEASURES STUDY (SITES HAVE ALREADY COMPLETED NYSDEC RCRA CORRECTIVE ACTION OR EQUIVALENT PROCESS THROUGH ORDERS ON CONSENT. FINAL CORRECTIVE MEASURES ARE BEING IMPLEMENTED UNDER AUTHORITY OF THE PART 373 PERMIT.)

N W E S

0 300 600 900 1200

SCALE IN FEET

HALEY & ALDRICH

XEROX CORPORATION
WEBSTER, NEW YORK FACILITY
CORRECTIVE MEASURES STUDY

SITE-WIDE INVESTIGATIVE SITES AND SOLID WASTE MANAGEMENT UNIT LOCATION PLAN

SCALE: AS SHOWN
APRIL 2014

FIGURE 2

\\ROC\COMMON\XEROX\WEBSTER\FIGURES\CMS\2014\DRAWINGS\36909-117-0002-B10-SWMU.DWG

LEGEND:

- MONITORING OR RECOVERY WELL
  - OVERBURDEN
  - SHALLOW
  - INTERMEDIATE
  - DEEP
- GROUNDWATER PUMPING WELL
- PIEZOMETER
- ANGLED WELL
- GROUNDWATER QUALITY MONITORING (GQM) WELL
- ACTIVE RECOVERY WELL / PUMPING LOCATION
- BLASTED BEDROCK TRENCH
- PROPERTY BOUNDARY
- TOWN/VILLAGE LINE
- APPROXIMATE INVESTIGATIVE SITE BOUNDARY
- INVESTIGATIVE SITES NOT INCLUDED IN FACILITY CORRECTIVE MEASURES STUDY (SITES HAVE ALREADY COMPLETED NYSDEC RCRA CORRECTIVE ACTION OR EQUIVALENT PROCESS THROUGH ORDERS ON CONSENT. FINAL CORRECTIVE MEASURES ARE BEING IMPLEMENTED UNDER AUTHORITY OF THE PART 373 PERMIT.)

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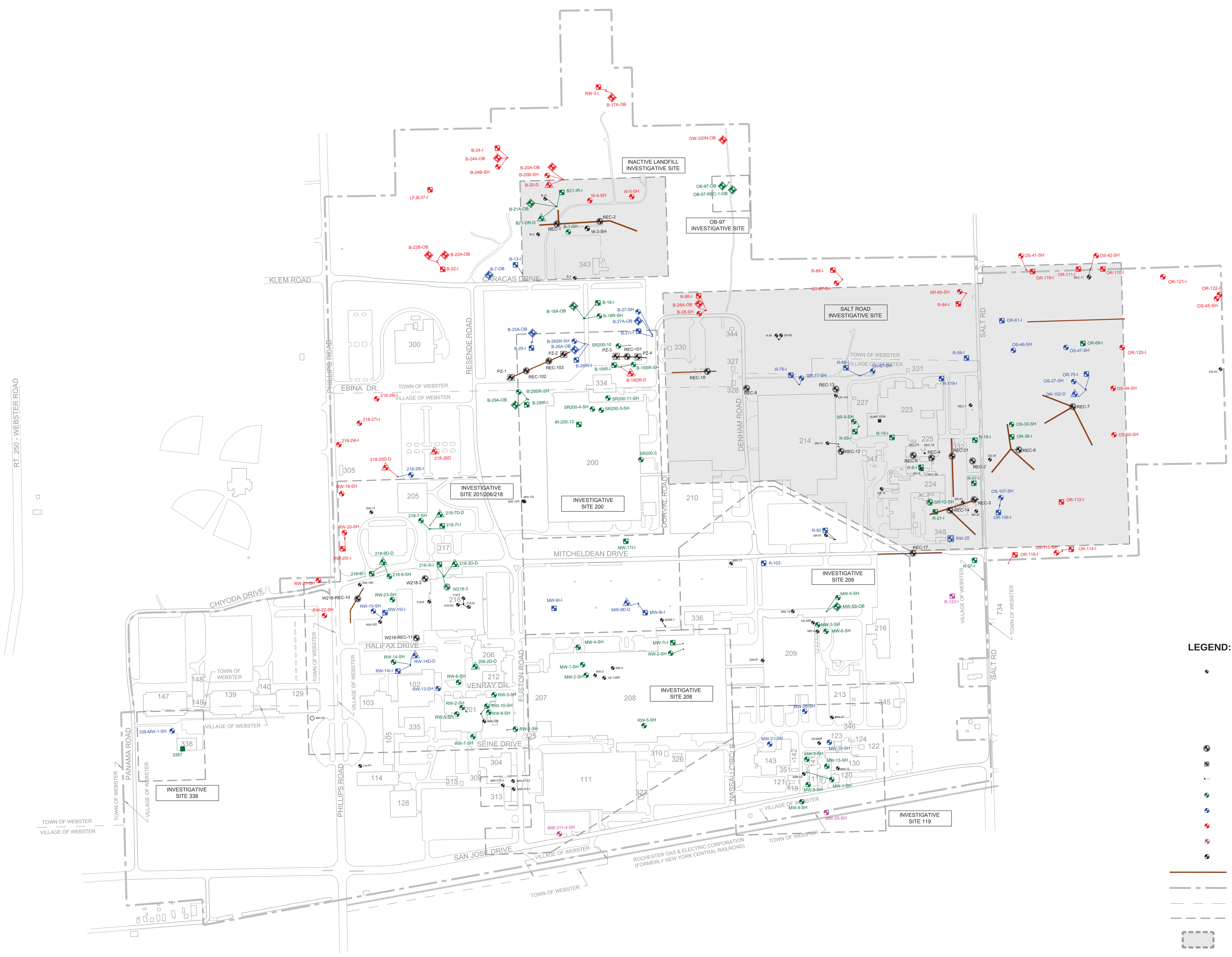
CORRECTIVE MEASURES STUDY

SITE-WIDE MIGRATION
CONTROL SYSTEM

SCALE: AS SHOWN

EROX\WEBSTER\FIGURES\CMS\2014\DRAWINGS\36909-117-0005-MIGRATION_CONTROL_STSTEM.DWG



EROX\WEBSTER\FIGURES\CMS\2014\DRAWINGS\36909-117-0006-SMPL_PROGRAM.DWG

LEGEND:

- MONITORING OR RECOVERY WELL
  - OVERBURDEN
  - SHALLOW
  - INTERMEDIATE
  - DEEP
- GROUNDWATER PUMPING WELL
- PIEZOMETER
- ANGLED WELL
- GROUNDWATER QUALITY MONITORING (GQM) WELL
- TRIGGER WELL
- LINE OF COMPLIANCE (LOC) WELL
- UPGRADIENT WELL
- WELLS NOT INCLUDED IN SAP
- BLASTED BEDROCK TRENCH
- PROPERTY BOUNDARY
- TOWN/VILLAGE LINE
- APPROXIMATE INVESTIGATIVE SITE BOUNDARY
- INVESTIGATIVE SITES NOT INCLUDED IN FACILITY CORRECTIVE MEASURES STUDY (SITES HAVE ALREADY COMPLETED NYSDEC RCRA CORRECTIVE ACTION OR EQUIVALENT PROCESS THROUGH ORDERS ON CONSENT. FINAL CORRECTIVE MEASURES ARE BEING IMPLEMENTED UNDER AUTHORITY OF THE PART 373 PERMIT.)

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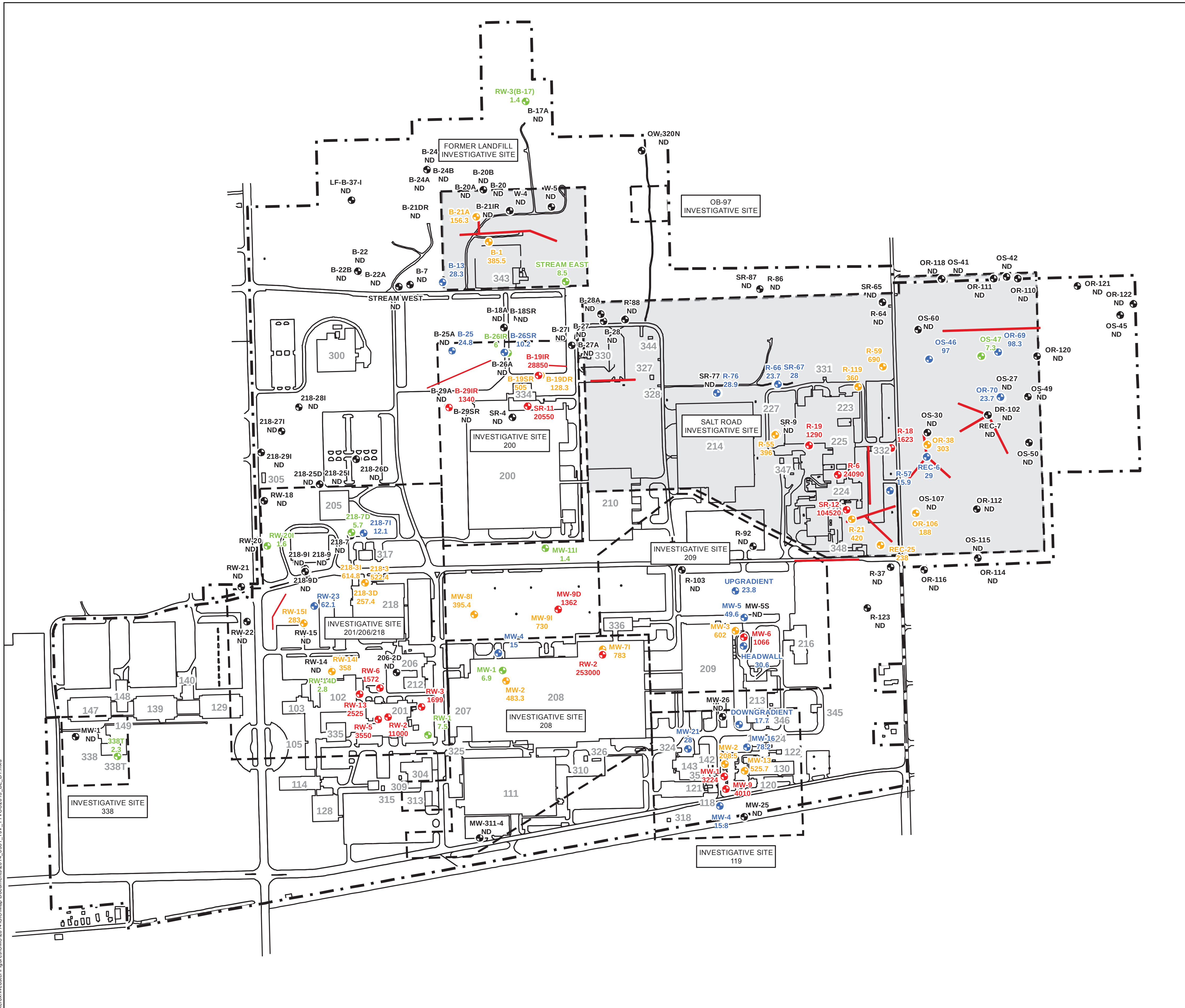
CORRECTIVE MEASURES STUDY

GROUNDWATER QUALITY SAMPLING PROGRAM

SCALE: AS SHOWN



G:\Xerox\Webster\Figures\CMS\2014\GIS\Map Documents\2014_0331_TJV_TTVOC2013_BL_D1.mxd

LEGEND:

MAXIMUM TOTAL TARGET VOLATILES DETECTED DURING 2013

- >1000 µg/l
- 100 - 1000 µg/l
- 10 - 100 µg/l
- >ND - 10 µg/l
- NON-DETECT (ND)
- BLASTED BEDROCK TRENCH
- XEROX PROPERTY BOUNDARY
- INVESTIGATIVE SITE
- INVESTIGATIVE SITES NOT INCLUDED IN THE FACILITY CORRECTIVE MEASURES STUDY (SITES HAVE ALREADY COMPLETED NYSDEC RCRA CORRECTIVE ACTION OR EQUIVALENT PROCESSES THROUGH ORDERS ON CONSENT. FINAL CORRECTIVE MEASURES ARE BEING IMPLEMENTED UNDER AUTHORITY OF THE PART 373 PERMIT.)

NOTES:

1) BASE MAP PROVIDED BY XEROX CORPORATION

N
W E
S

0 400 800 1,600

SCALE IN FEET

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XEROX CORPORATION
WEBSTER, NY
CORRECTIVE MEASURES STUDY

TOTAL TARGET VOLATILES POSTING MAP, 2013

SCALE: AS SHOWN
APRIL 2014

FIGURE 5