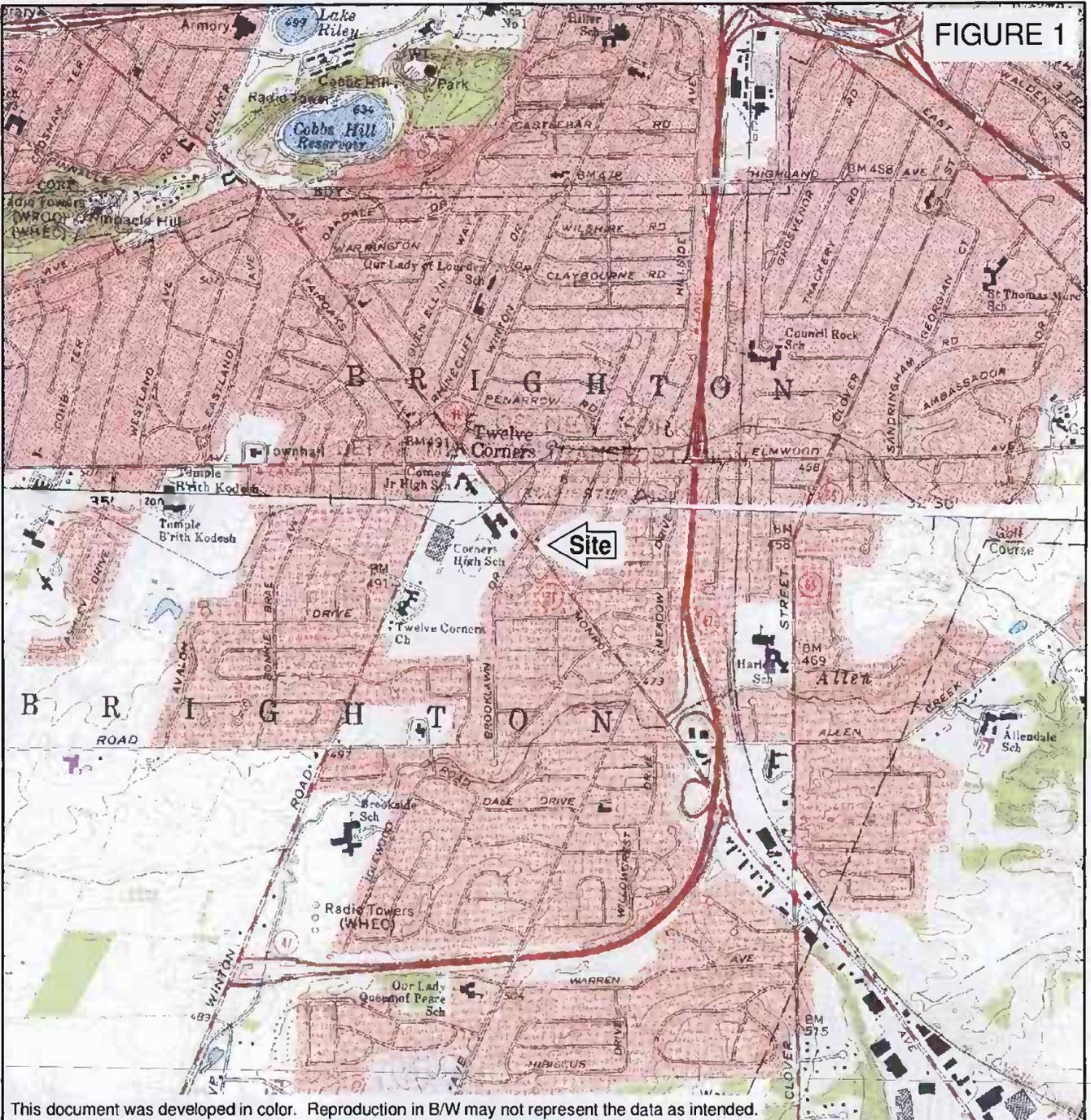


T:\110653_NYSDEC\CARRIAGECLEANERS\MXD\35749\SITE_LOC.MXD

FIGURE 1



PLOT DATE: 1/30/07

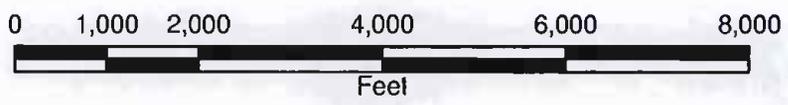
This document was developed in color. Reproduction in B/W may not represent the data as intended.

ADAPTED FROM: ROCHESTER EAST AND PITTSFORD, NY USGS QUADRANGLES.



NYSDEC
 CARRIAGE CLEANERS
 TOWN OF BRIGHTON
 ROCHESTER, NEW YORK

SITE LOCATION





This document was developed in color. Reproduction in B/W may not represent the data as intended.

FIGURE 2



NYSDEC
CARRIAGE CLEANERS
TOWN OF BRIGHTON, NY

**INVESTIGATION AREA
REFERENCE MAP**



FEBRUARY 2007
1065335749



**FIGURE 4
SOIL BORING LOCATIONS
WITH PCE SOIL SAMPLE
RESULTS**



Sample Annotation
nd: Indicates compound was analyzed for, but not detected.
Units for soil samples are in parts per million (ppm).



New York State
Department of Environmental Conservation
Division of Environmental Remediation

MAP DETAILS

Created in ArcGIS 9.1
Created By: J. Pelton
Last Revision Date: 2/15/08

UNAUTHORIZED DUPLICATION
IS A VIOLATION OF APPLICABLE LAWS

**Carriage Cleaners
Site # 8-28-120**

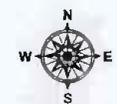
Monroe County
Town of Brighton

DEC Contact:
J. Pelton

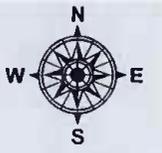
DOH Contact:
D. McNaughton

Legend

- Soil Borings
- Carriage Cleaners Building
- Roads
- Tax Parcels



North American Datum 1983
UTM Zone 18N



North American Datum 1983
UTM Zone 18N



New York State
Department of Environmental Conservation
Division of Environmental Remediation

ELMWOOD AVE

CONTINENTAL DR

TORRINGTON DR

HAMPSHIRE DR

IRVING RD

ELMORE RD

LACONIA PKWY

ORCHARD DR

MONROE AVE

SUNSET DR

NEWCREST DR

MONROE PKWY

ELWELL DR

ROOSEVELT RD

WILMOT RD

Legend

Vapor Intrusion Sampling Events

- PHASE 1
- PHASE 1 AND 2
- PHASE 2

Mitigation Systems

- NYSDEC Sub-Slab Depressurization Systems
- NYSDEC Ventilation System
- Newcomb Oil Mitigation Systems

— Roads

**FIGURE 7
VAPOR INTRUSION SAMPLING
AND MITIGATION SYSTEM
LOCATIONS**

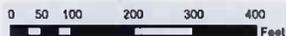
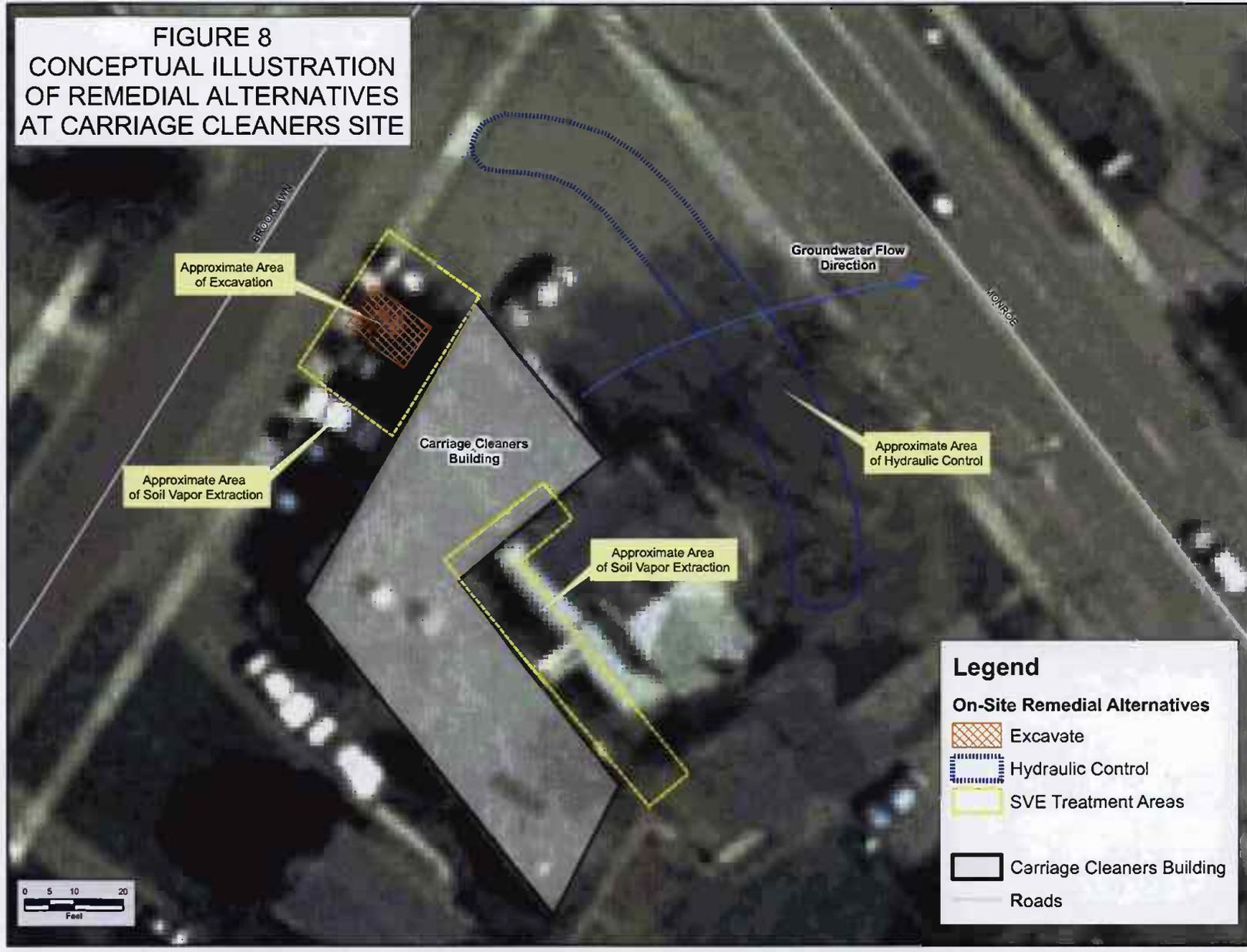


FIGURE 8
CONCEPTUAL ILLUSTRATION
OF REMEDIAL ALTERNATIVES
AT CARRIAGE CLEANERS SITE



New York State
 Department of Environmental Conservation
 Division of Environmental Remediation

MAP DETAILS

Created in ArcGIS 9.1
 Created By: J. Pelton
 Last Revision Date: 2/1/08

UNAUTHORIZED DUPLICATION
 IS A VIOLATION OF APPLICABLE LAWS

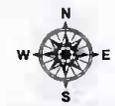
Carriage Cleaners
 Site # 8-28-120

Monroe County
 Town of Brighton

DEC Contact:
 J. Pelton

DOH Contact:
 D. McNaughton

Spring 2003
 Aerial Photography



North American Datum 1983
 UTM Zone 18N

Legend

On-Site Remedial Alternatives

-  Excavate
-  Hydraulic Control
-  SVE Treatment Areas
-  Carriage Cleaners Building
-  Roads



APPENDIX A

Responsiveness Summary

RESPONSIVENESS SUMMARY

Carriage Cleaners - Brighton Site Town of Brighton, Monroe County, New York Site No. 8-28-120

The Proposed Remedial Action Plan (PRAP) for the Carriage Cleaners - Brighton site, 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 February 29, 2008. The PRAP outlined the remedial measure proposed for the contaminated soil, groundwater, and soil vapor at the Carriage Cleaners - Brighton site.

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 13, 2008, which included a presentation of the Remedial Investigation (RI) and the Feasibility Study (FS) 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 31, 2008.

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: How much money is in Superfund?

RESPONSE 1: The State Superfund is replenished on an annual basis with approximately 120 million dollars. The funding comes from the State General Fund and is allocated for Remedial Investigation and Feasibility Study (RI/FS) along with Design and Construction activities at State Superfund sites.

COMMENT 2: Can homeowners who have not had their basements tested, request that their basements be tested now, or in the future?

RESPONSE 2: If residents are interested in having vapor intrusion sampling completed, they should contact the Department Project Manager (Jason Pelton) to discuss their location and possible vapor intrusion sampling. The specific location will be compared to the vapor intrusion sampling results along with other remedial investigation data collected during the Carriage Cleaners RI/FS to determine if additional vapor intrusion sampling is necessary.

COMMENT 3: Residents around the area are wondering about the remediation of Speedy's Cleaners. What is the status update on that site? Will you be remediating any contamination there? When was the Speedy's problem discovered? People around here see you working over

at Carriage and wonder what the risks are over at Speedy's?

RESPONSE 3: Data collected during the Carriage Cleaners remedial investigation completed between 2005 and 2007 provided enough information to list the Former Speedy's Cleaners site (HW ID# 8-28-128) located at 2150 Monroe Avenue as a Class 2 site on the New York State Registry of Inactive Hazardous Waste Disposal Sites. During the public comment period for the Carriage Cleaner's site, the Department's Office of General Counsel issued notification letters to potential responsible parties (PRPs). The letters notify the PRPs of the investigation and cleanup requirements and provide the PRPs with 30 days to notify the Department of their intentions to enter into a remedial program. Although there is contaminated groundwater associated with the Former Speedy's Cleaners site, no one drinks the groundwater because the area is supplied with public drinking water. Vapor intrusion sampling completed during the Carriage Cleaners RI/FS did not show that the installation of mitigation systems is necessary for contamination associated with the Former Speedy's Cleaners site.

COMMENT 4: How does the Carriage Cleaners site relate to the Modock Road Springs/DLS Sand and Gravel, Inc. site located in the Town of Victor?

RESPONSE 4: Based on vapor intrusion sampling completed at the Modock Road Springs site, six (6) of 64 locations sampled required mitigation. During the Carriage cleaners RI, three (3) properties of the 45 properties sampled required mitigation. The contaminants at Carriage Cleaners include PCE and PCE breakdown products where the contaminants at the Modock Road Springs site includes 1,1,1-TCA along with TCE and DCE. The mitigation systems installed at the Carriage Cleaners site are located in close proximity to the site and where disposal had occurred. In contrast, the mitigation systems installed at the Modock Road Springs site occurred over 1000 feet from the suspected disposal area and over the groundwater plume. Hydrogeologically, groundwater occurs at a depth of approximately 10 to 12 feet below ground surface at the Carriage Cleaners site and greater than 60 feet below ground surface at the Modock Road Springs site.

COMMENT 5: If someone has their home tested and elevated levels of contamination is found, will the DEC install a sub-slab vapor extractor?

RESPONSE 5: The need for the installation of a mitigation system by the Department is decided after consultation with the NYSDOH and after consideration of several factors. These include the evaluation of vapor intrusion sampling data to the Guidance for Evaluating Soil Vapor Intrusion in the State of New York, dated October 2006 and to data collected from nearby locations.

COMMENT 6: Why didn't you do any off-site sampling and remediation?

RESPONSE 6: The remedial investigation did include the collection of soil, groundwater, and air samples from several off-site locations. This included off-site soil sampling at the Former Speedy Cleaners site, installation of 12 off-site groundwater monitoring wells, and vapor intrusion sampling at 44 off-site residences. The selected remedy outlined in the PRAP focuses

on addressing PCE contamination at the Carriage Cleaners property and preventing continued off-site migration of the contaminants. The remedy will also include an off-site groundwater and vapor intrusion monitoring program and the continued operation and maintenance of existing off-site mitigation systems.

COMMENT 7: It has already taken approximately four (4) years since the contamination was first identified. Is there anything that can be done to expedite the cleanup? Why is this cleanup taking so long and is there anything that can be done to expedite the cleanup?

RESPONSE 7: The investigation was comprehensive and included the collection of data at both the Carriage Cleaners property and the Former Speedy's Cleaners property. In addition, the vapor intrusion sampling program was an iterative process that included collection of vapor intrusion samples during two winter heating seasons.

COMMENT 8: Is contamination flowing in or out of the storm sewers, or both?

RESPONSE 8: Data collected during the RI suggest that historic dry cleaning operations at the site resulted in the discharge of PCE into the storm sewer system. A crack was identified in a section of the storm sewer lateral located adjacent to the west-side of the Carriage Cleaners building. Based on the presence of PCE in site soil at concentrations that exceed the soil cleanup objective of 1.3 ppm adjacent to and beneath the storm sewer utility, some portion of the PCE contamination at the site is associated with the failed underground storm sewer utility.

COMMENT 9: Which sewer has contamination—the sanitary or storm sewer?

RESPONSE 9: No contamination was identified in either the sanitary or storm sewer system. Instead, and as described in Comment #8, PCE contamination was identified in soil beneath the underground storm sewer utility.

COMMENT 10: Did you test further downstream of the storm sewer?

RESPONSE 10: No samples were collected from the actual water flowing in the sewer system. Soil samples collected beneath and downstream of the storm sewer (away from the Carriage Cleaners building and near Brooklawn Drive) suggest that PCE contamination in the soil is restricted to the immediate area near the underground storm sewer utility on the Carriage Cleaners property.

COMMENT 11: You've done your homework and know how to correct the problems, so why would it take 2 years to clean up?

RESPONSE 11: Once the Record of Decision is issued, our legal staff are required to contact the potential responsible parties (PRPs) and notify them of cleanup responsibilities. The PRPs declined to implement the RI/FS at the site when requested by the Department. After the remedy is selected, the PRPs will again be contacted to assume responsibility for the remedial program. If an agreement cannot be reached with the PRPs, the Department will evaluate the site for

further action under the State Superfund. This entire process may take up to two years to be completed.

COMMENT 12: Do you have priority levels of clean ups? Do you move faster on priority cleanups at other sites? I am sure you are understaffed and overworked like the rest of us, but how can we help expedite this process here?

RESPONSE 12: The site is listed as a Class 2 site in the NYS Registry of Inactive Hazardous Waste Disposal Sites. Class 2 sites are the highest priority. The Department is committed to remediate the Carriage Cleaners site as quickly as possible.

COMMENT 13: What is the incentive for a business to clean this up? Why should they clean up their hazardous waste if Superfund is in place? As a taxpayer I'm concerned, why should I pay for what they did?

RESPONSE 13: If a responsible party undertakes the cleanup, they will have better control of the remediation process and be able to directly control remediation costs. Although State Superfund monies may be expended to implement the remedy, the State will pursue recovery of costs expended during the site investigation and remediation.

COMMENT 14: How often are the monitoring wells checked/when was the last time monitoring wells were sampled?

RESPONSE 14: During the RI, the monitoring wells were sampled for lab analysis during two separate sampling events. Monitoring wells on the Carriage Cleaners property were last sampled in November of 2007.

COMMENT 15: The town has been doing sewer work and excavating near the area towards the street. Are you watching this/monitoring while this is being done? Have you tested these soils? Has this work become a problem?

RESPONSE 15: The State has been notified of periodic utility excavation activities. With the help of the Monroe County Health Department, field analyses have been performed to assess the quality of soil within the excavations. Utility excavation activities have not become a problem.

COMMENT 16: What do you mean the plume is stable? Doesn't groundwater flow make it constantly move?

RESPONSE 16: The groundwater quality data and the groundwater flow data suggest that the plume is not expanding. Groundwater flows at an estimated rate of one foot per day and does not appear to be causing expansion of the plume. Data collected at the site does not suggest that there is a continued source for PCE that would continue to contaminate groundwater as it migrates off-site.

COMMENT 17: Is there TCE and PCE at the site?

RESPONSE 17: The primary contaminant of concern is PCE. As PCE breaks down, typically in anaerobic (without oxygen) conditions, it forms TCE. Soil and groundwater at the site are contaminated with both TCE and PCE, but PCE occurs in both media at higher concentrations.

COMMENT 18: If our house is tested and nothing is found, does the DEC stand behind the results with a letter stating that my house is tested and found to be clean? What are the legal ramifications? I'd like a letter to show prospective buyers 15 years from now that here is the paper DOH and the DEC gave me, proving my house is clean?

RESPONSE 18: Following vapor intrusion sampling, the NYSDOH sends a letter summarizing the results from that sampling event. Unless the results indicate that follow-up actions are necessary, there is no need to complete additional vapor intrusion sampling unless site conditions change. One of the most direct ways to determine if changes in the contaminant plume are occurring and if follow-up vapor intrusion sampling is necessary is to monitor groundwater quality. As part of the remedy, groundwater quality monitoring will be completed on a periodic basis.

COMMENT 19: Since the contamination is not going to be removed and it is not moving, will there be periodic soil and groundwater and air testing of homes? Testing beneath the basement floors? I'd like my house tested periodically, say every 2-3 years. Are sampling results available to the public on the periodic sampling that is done?

RESPONSE 19: As outlined in the presentation, the Department will continue to monitor as necessary at seven locations. If residents are interested in having vapor intrusion sampling completed, they should contact the Department Project Manager (Jason Pelton) to discuss their location and possible vapor intrusion sampling. The specific location will be compared to the vapor intrusion sampling results collected during the remedial investigation to determine if additional vapor intrusion sampling is necessary. The remedy also includes a long-term groundwater quality monitoring program. This will allow the Department to determine if groundwater conditions change and to evaluate the effectiveness of the selected remedy. As part of the pre-design investigation, soil samples will be collected from the Carriage Cleaners property, but it is not expected that soil samples will be routinely collected for laboratory analysis. Periodic sampling results will be summarized in reports and placed in the document repositories.

COMMENT 20: You had difficulties testing at my home, so will you be trying to test the soils again or try to do another house on my street if you can't test my home?

RESPONSE 20: During the attempted collection of a sub-slab sample at one home, water was encountered beneath the basement floor at multiple locations and a sub-slab sample could not be collected. This location will be re-sampled in April of 2008 and the collection of a sub-slab sample will once again be attempted. The Department staff will determine how to proceed based on the results of the April 2008 sampling event.

COMMENT 21: Do dry cleaners still use these solvents? How do you address future use of

these solvents? How can this contamination not reoccur?

RESPONSE 21: PCE is still commonly used by dry cleaning establishments and is allowed. It is estimated that approximately 2000 dry cleaning facilities in NYS continue to use PCE. Dry cleaning facilities are regulated under 6NYCRR Part 232 and are inspected at least once each year by an independent Department approved Part 232 Registered Compliance Inspector. Inspections include a review of PCE usage forms and hazardous waste management logs. Dry cleaning facilities that use PCE solvent are also subject to the requirements in Part 232.9 that state: "PCE-contaminated wastewater ... must be treated by physical separation (water separator) and double carbon filtration which has been properly designed to assure an effluent quality that is less than or equal to 20 ppb (parts per billion) PCE..." before the treated wastewater is legally discharged to a sewer or evaporated.

COMMENT 22: How many people here would like their homes tested? I would like you to take these peoples names and addresses and test them. I'd like you to address anyone, even if they are outside the study area. I'd like these residents to know that their homes are safe and clean or that they know they have work to do to get them safe and clean?

RESPONSE 22: Three residents raised their hands, but two of the three decided that testing was not necessary after learning that their property is upgradient of the site. If residents are interested in having vapor intrusion sampling completed, they should contact the Department Project Manager (Jason Pelton) to discuss their location and possible vapor intrusion sampling. The specific location will be compared to the vapor intrusion sampling results along with other remedial investigation data collected during the Carriage Cleaners RI/FS to determine if additional vapor intrusion sampling is necessary.

COMMENT 23: The town of Brighton will help to push for expediting this clean up program?

RESPONSE 23: No response necessary.

COMMENT 24: What measures do you have at your disposal? Do you have the authority to close businesses down? Can you enforce future contamination from occurring? What if businesses continue to pollute? What if they are repeat offenders? What will happen if they still dump contaminates down their storm drains and into the sewers? How would we know if this dumping is, or is not, continuing?

RESPONSE 24: The Department does not have the authority to close a business. The Department will enforce penalties for future disposal of PCE at the site. As described in Comment #21, the dry cleaning facility is regulated under Part 232. Additionally, groundwater quality monitoring and operation of the remediation system will allow the Department to determine if disposal to the environment is continuing.

COMMENT 25: What direction are the storm waters flowing? What will happen if contamination shows up about ½ mile down from the site, in the sewers, in a break in the sewer, or in the discharge points?

RESPONSE 25: The underground storm sewer flows from Brooklawn Drive to an underground storm sewer main in Monroe Avenue. The Monroe Avenue main flows to the east. There is no data suggesting that PCE continues to be disposed of in the storm sewer system.

COMMENT 26: I take exception to what you are saying about the groundwater. DEC should test the groundwater off-site. If you have contamination on-site, the groundwater must cause it to go off-site. Don't be a bureaucrat, this is dangerous stuff and needs to be tested off site?

RESPONSE 26: Off-site groundwater monitoring has been completed and will continue to be monitored as part of the final remedy. However, as a result of this and previous comments, the remedy has been modified to include the closing of all floor drains entering the storm sewer system.

COMMENT 27: Can you estimate when the contamination was spilled into the ground? Can you estimate by the shape of the breakdown products?

RESPONSE 27: For the Carriage Cleaners site, we know that the property has operated as a dry cleaner for approximately 50 years. It is difficult to estimate the time of release during this 50 year period with much confidence based on the nature and extent of the PCE contamination.

COMMENT 28: Is there an agency in place to check dry cleaners specifically--and can help DEC out? How can our state become more proactive?

RESPONSE 28: Under 6 NYCRR Part 232, the Department's Division of Air Resources regulate dry cleaning facilities. This includes facility inspection initiatives. Additionally, the Department has the responsibility to investigate complaints about dry-cleaners from the public; facilities discovered not to be in compliance with Part 232 at any time are subject to enforcement actions including monetary penalties. The Department reserves its option to conduct additional audit inspections of dry-cleaning facilities which have recently undergone the required Compliance Inspections. These follow-up inspections allow the Department to monitor the activities of the authorized Registered Compliance Inspectors and to confirm the findings they submit to DEC Regional Air Pollution Control Engineers in the Compliance Inspection reports. Additional information on Part 232 can be found at the following Department website: <http://www.dec.ny.gov/chemical/8567.html>.

The State is proactive in initiating site characterization activities at dry cleaning operations. Currently, the Department is also completing site characterization activities at over 20 additional dry cleaning sites.

COMMENT 29: I am a homeowner who was effected by the Citgo petroleum spill and now this. Is there any DEC certification for home sales, stating the home is free from remediation? Deals have fallen through around here when people find out there were spills. It is painful, this always gets in the news, and people are trying to sell their homes. The public doesn't care about ppb and values. The public just knows there was a spill there?

RESPONSE 29: The Department and the NYSDOH do not provide certification letters. To

address concerns and uncertainties, both the Department and the NYSDOH staff generally are available by telephone to discuss site activities and results with prospective home purchasers, realtors, and the sellers.

COMMENT 30: Is it a reasonable request to have DOH sample basements of homes in areas of these spills and get them certified so they can sell?

RESPONSE 30: Neither the Department or the NYSDOH will complete vapor intrusion sampling as part of a property transaction.

COMMENT 31: Are wells monitored just for PCE or for other chemicals as well? Are the sampling values available on your website in a simple to follow format, simple like your slide presentation? Did you put in 13 additional wells or are these the wells from the gas station spill?

RESPONSE 31: Groundwater samples are collected and analyzed for a list of approximately 50 volatile organic compounds. This includes PCE and PCE breakdown products, additional chlorinated solvents, and gasoline related volatile organic compounds. Some of the data, along with an electronic version of the Proposed Remedial Action Plan, is provided on the following website: <http://www.dec.ny.gov/chemical/8666.html>. The RI report, FS report, and the PRAP are also available at the document repositories. This includes the Town of Brighton public library and the NYSDEC Region 8 office. The Carriage Cleaners RI included the installation of 13 additional monitoring wells to supplement the wells installed as part of the petroleum spill investigation.

COMMENT 32: What does a Class 2 site designation mean? What are these sites obligated to do if they are listed as Class 2? Is Speedys a class 2? Will there be a meeting like this for Speedys?

RESPONSE 32: By definition, a Class 2 site is one at which contamination constitutes a significant threat to public health or the environment. As a Class 2 site, a Remedial Investigation and Feasibility Study must be completed. The Former Speedy's Cleaners site is listed as a Class 2 site. A public meeting to present the proposed remedy will be held for the Former Speedy's Cleaners site when the required work is completed.

COMMENT 33: Are you dealing with the current owner of Speedys or the other people who once occupied that shop?

RESPONSE 33: The Department has sent 30-day notification letters indicating that a remedial program must be implemented at the site to both the current owner and the former operator of the Speedy's Cleaners.

COMMENT 34: What is the timing involved with this site (Former Speedy's Cleaners)? What is the 30 day notice letter?

RESPONSE 34: Since a considerable amount of investigation work has already been completed

at the Former Speedy's Cleaners site as part of the Carriage Cleaners investigation, there is only limited additional remedial investigation work to be completed at the Former Speedy's Cleaners site. As such, the time frame associated with developing a Feasibility Study and a proposed remedy for the site is expected to be considerably less in comparison to the Carriage Cleaners site. As stated in Comment Response #33, the Department recently sent 30-day notification letters to both the current owner and the former operator of the Speedy's Cleaners. The 30-day letters are sent to potential responsible parties (PRPs) notifying them of the remedial program requirements. Specifically, the letters indicate that remedial actions must be taken at the site and the PRPs have 30 days to notify the Department of their intentions to undertake the remedial actions at the site.

COMMENT 35: Are you held up cleaning up a site when tracking down previous owners?

RESPONSE 35: As stated in Comment #34, the PRPs must be contacted and provided an opportunity to undertake the remedial activities at the site.

COMMENT 36: Do you go after the owner or occupant of a property for clean up costs?

RESPONSE 36: The Department pursues the current owner and previous owners for the recovery of investigation and cleanup costs.

COMMENT 37: Is the Monroe County DOH involved in this site? We need as many advocates as we can get?

RESPONSE 37: Yes. The Department has worked closely with the Monroe County Health Department in developing the scope of the remedial investigation, in implementing the investigation, and with developing the proposed remedy. The Department expects this close working relationship to continue as the remedy gets implemented.

COMMENT 38: Are you sampling groundwater from within the bedrock? Is there a groundwater reservoir being sampled there? Is there clay soil down there?

RESPONSE 38: The majority of the groundwater samples are collected from groundwater that occurs in the shallow bedrock. Bedrock occurs at a depth of 10 to 12 feet below the ground surface. There is no large underground reservoir. Instead, groundwater primarily occurs and migrates in the fractures, or cracks in the bedrock. The overburden, or soil, above the bedrock consists predominantly of silt and fine sand. Clay was not commonly encountered during the remedial investigation.

COMMENT 39: Is the Citgo site for sale? Is it clean and safe for sale? Can anything be built there or are there restrictions? Is it a financial burden for the next owner to purchase a monitored site?

RESPONSE 39: The property is currently for sale. Based on routine groundwater quality

monitoring at the site, low levels of residual petroleum contamination exist in the site groundwater. The property can be developed, but it is likely that a sub-slab ventilation system or another form of engineering control would be required to prevent the intrusion of vapors into overlying structures. It is likely that prospective purchasers would factor potential environmental liabilities and costs into the purchase price.

COMMENT 40: Can we do anything about the snow accumulating and not being cleaned up from the sidewalk in front of Citgos?

RESPONSE 40: This is a Town of Brighton issue and should be brought to the attention of the Town.

COMMENT 41: Did you know there was a sewer (or source) problem at Speedys? At Carriage Cleaners? I live down the street from Speedys, how would you know if there is another sewer/source "situation" down my street?

RESPONSE 41: Data collected during the investigation documented that the release of some PCE from the Carriage Cleaners site was associated with a failed section of the storm sewer utility. Data collected at the Former Speedy's Cleaners site does not suggest that PCE releases from the underground sewer utilities has occurred.

COMMENT 42: Are soil measurements/levels the final soil cleanup tests?

RESPONSE 42: No. The effectiveness of the selected remedy will rely on a comparison of groundwater data to the Department's "Ambient Water Quality Standards and Guidance Values, soil quality data to 6 NYCRR Subpart 375-6 - Remedial Program Soil Cleanup Objectives for Unrestricted Property Use, and soil vapor and indoor air data to the air guidelines provided in the NYSDOH guidance document titled "Guidance for Evaluating Soil Vapor Intrusion in the State of New York," dated October 2006.

COMMENT 43: If the migration of groundwater is away from my house, do I need to worry? If I'm in the opposite direction of the groundwater flow, do I need to worry about the wells being tested?

RESPONSE 43: The homeowner indicated that his house is upgradient of the Carriage Cleaners site. Based on this location relative to the site and the groundwater flow direction, there is no need to be concerned about contaminants migrating from the Carriage Cleaners site toward the specified property. Monitoring wells installed upgradient of the Carriage Cleaners site document that the contaminants from Carriage Cleaners have not migrated in an upgradient direction.

Town of Brighton Supervisor, Sandra L. Frankel submitted a letter dated March 27, 2008 which included the following four (4) comments:

COMMENT 44: As the Former Speedy's Cleaners site is also contributing to the contamination, we urge you to accelerate the process of investigation and remedial design for that site.

RESPONSE 44: The Former Speedy's Cleaner site is listed as a Class 2 site in the NYS Registry of Inactive Hazardous Waste Disposal Sites. The Department is committed to remediate the Former Speedy's Cleaners site as quickly as possible.

COMMENT 45: If a homeowner in the area has not yet had his/her basement tested for vapors, we urge the NYSDEC and/or State Health Department to again offer such testing to them. Further, if elevated levels are found, NYSDEC should then install a subslab ventilation system as a part of the remedy.

RESPONSE 45: If residents are interested in having vapor intrusion sampling completed, they should contact the Department Project Manager (Jason Pelton) to discuss their location and possible vapor intrusion sampling. The specific location will be compared to the vapor intrusion sampling results along with other remedial investigation data collected during the Carriage Cleaners RI/FS to determine if additional vapor intrusion sampling and if mitigation system installation is necessary.

COMMENT 46: The proposed schedule for this remediation calls for work to begin 1-2 years from now. This is far, far too long, given the very slow pace to date.

RESPONSE 46: As outlined in Response 11, once the Record of Decision is issued, our legal staff are required to contact the potential responsible parties (PRPs) and notify them of cleanup responsibilities. The PRPs declined to implement the RI/FS at the site when requested by the Department. After the remedy is selected, the PRPs will again be contacted to assume responsibility for the remedial program. If an agreement cannot be reached with the PRPs, the Department will evaluate the site for further action under the State Superfund. This entire process may take up to two years to be completed.

COMMENT 47: The proposed remedy should also include:

- A) regular monitoring of storm and sanitary sewer flows from the property, to assure that further discharges of hazardous materials are not occurring;
- B) the abandonment of the floor drains in the property; and
- C) the trucking of ground water off-site for treatment, rather than its discharge to the sanitary sewers. We are concerned about the potential for exfiltration.

RESPONSE 47:

- A) As described in Response 21, dry cleaning facilities are regulated under 6NYCRR Part 232 and are inspected at least once each year by an independent Department approved Part 232 Registered Compliance Inspector. Inspections include a review of PCE usage forms and hazardous waste management logs. Dry cleaning facilities that use PCE solvent are also subject to the requirements in Part 232.9 that state: "PCE-contaminated wastewater ... must be treated by physical separation (water separator) and double carbon filtration which has been properly designed to assure an effluent quality that is less than or equal to 20 ppb (parts per billion) PCE..." before the treated wastewater is legally discharged to a sewer or

evaporated.

B) In response to public concerns that the facility contains floor drains that may convey possible dry cleaning contaminants to the environment and into the storm sewer system, the Department has modified the proposed remedy to include closure of the floor drains as part of the final remedy.

C) As outlined in the selected remedy, disposal of extracted groundwater will be to the municipal sewer system. It is not anticipated that pre-treatment of recovered groundwater will be required prior to disposal. The Department has already had discussions with the Monroe County Environmental Services Division of Pure Waters regarding the discharge of recovered groundwater to the municipal sewer system. Information, including the quality and quantity of recovered groundwater, will be provided to Monroe County Pure Waters in an application to discharge to the municipal sewer system. The application must be approved by Monroe County Pure Waters before discharge to the municipal sewer system can occur.

APPENDIX B

Administrative Record

Administrative Record

Carriage Cleaners - Brighton Site

Site No. 8-28-120

1. Proposed Remedial Action Plan for the Carriage Cleaners - Brighton site, dated February 2008, prepared by the Department.
2. "Project Status Report #1 - Former Citgo Station", December 2003, prepared by Haley & Aldrich.
3. "Sub-Slab and Indoor Air Sampling Report", March 2004, prepared by NYSDEC Division of Environmental Remediation.
4. "Operations and Monitoring Report-Spill #0306131", July 2004, prepared by Haley & Aldrich.
5. "Phase II Environmental Site Assessment Preliminary Site Characterization", July 2004, prepared by LaBella Associates, P.C.
6. "Monitoring Well Installation and Development", August 2004, prepared by Empire GeoServices, Inc.
7. "Remedial Investigation/Feasibility Study Work Plan Carriage Cleaners - Site #8-28-120", February 2005, prepared by O'Brien and Gere Engineers, Inc.
8. "Citizen Participation Plan for the Carriage Cleaners Site", March 2005, prepared by NYSDEC Division of Environmental Remediation.
9. "Remedial Investigation Report RI/FS Carriage Cleaners - Site #8-28-120", January 2007, prepared by O'Brien and Gere Engineers, Inc.
10. "Feasibility Study Report Carriage Cleaners - Site #8-28-120", October 2007, prepared by O'Brien and Gere Engineers, Inc.
11. "Soil & Groundwater Sampling Report", March 2008, prepared by Empire GeoServices, Inc.

12. Fact Sheet dated May 5, 2004 for Environmental Cleanup at Newcomb Oil/Citgo Station 2087 Monroe Avenue.
13. Fact Sheet dated November 5, 2004 for Environmental Cleanup Activities and Investigations at Carriage Cleaners & Newcomb Oil/Former Citgo Station.
14. Meeting Announcement dated November 2004 for Public Availability Session on November 18, 2004.
15. Postcard Notice dated July 2005 Providing Remedial Investigation Update.
16. Postcard Notice dated February 2005 for Announcement of Remedial Investigation and Feasibility Study.
17. Fact Sheet dated February 28, 2008 for Remedial Action Proposed for the Carriage Cleaners site.
18. Referral Memorandum dated July 29, 2004 for a remedial investigation/feasibility study and interim remedial program if appropriate.