NEW YORK STATE OF OPPORTUNITY. | Department of Environmental Conservation

FINAL STATEMENT OF BASIS

Xerox Webster - RCRA Facility

Operable Unit Number: 01

Site No. 828178

EPA ID No. NYD002211324

Webster, Monroe County

March 2015

PREPARED BY

DIVISION OF ENVIRONMENTAL REMEDIATION

DECLARATION STATEMENT - STATEMENT OF BASIS

Xerox Webster - RCRA Facility
Operable Unit Number: 01
Webster, Monroe County
NYD002211324 / Site No.828178
March 2015

Statement of Purpose and Basis

This document presents the remedy for the Xerox Webster- RCRA Facility. 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 Xerox Webster- RCRA Facility and the public's input to the proposed remedy presented by the Department.

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, 2015
Date

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

Statement of Basis

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Operable Unit Number: 01
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SECTION 1: INTRODUCTION

The New York State Department of Environmental Conservation (Department), in consultation with the New York State Department of Health (NYSDOH), has selected the final corrective measures for the aforementioned facility. The release of hazardous wastes and/or hazardous constituents at the site were addressed in part by actions known as an interim corrective measures (ICM) which was undertaken at the site. An ICM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the Statement of Basis. The ICMs undertaken at this site are discussed in Section 6.

The corrective measure(s) is/are intended to attain the cleanup objectives identified for this facility for the protection of public health and the environment. This Statement of Basis (SB) identifies the final corrective measure(s), summarizes the other alternatives considered, and explains the reasons for selecting the final remedy.

Based on the results of the investigations at the site, the ICMs that have been performed and the evaluation presented here, the Department has selected No Further Action with Site Management as the remedy. This No Further Action remedy includes the implementation of Institutional and Engineering Controls (ICs/ECs) as the final remedy for the site. The Department believes that this remedy is protective of human health and the environment and satisfies the remediation objectives described in Section 6.5.

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 repository:

NYSDEC Region 8 Headquarters
6274 East Avon-Lima Road
Avon, New York 14414.
Telephone # 585-226-2466

The proposed Statement of Basis was distributed to the public on February 27, 2015. A comment period was established from February 27, 2015 to March 31, 2015. Information about the comment period and citizen participation actions for this site is summarized in the responsiveness summary section of the

Statement of Basis.

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: FACILITY BACKGROUND

Location: The Xerox Corporation, Joseph C. Wilson Center for Technology (facility), is located on Phillips Road in the Town of Webster, New York as shown on Figure 1. 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:

Xerox Corporation Landfill, Site #828013, Class 4; Remediation consisted of constructing a macadam cap, creating a blast enhanced drainage zone in the bedrock and installing groundwater recovery wells. A Record of Decision was issued for this site on June 30, 1989.

Xerox - Salt Road Complex, Site #828067, Class 2; The Salt Road Complex is on the eastern side of the Xerox campus, and consists of Buildings 223, 224, and 225. A Statement of Basis for this site was issued on July 29, 1993.

Xerox - Building 209, Site #828068, Class 2; this site consists of Building 209 and 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, Class 2; this site consists of Building 201 and 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, Class 2; This site is located within the Xerox Corporation's Webster facility on the south side of San Jose Boulevard across from Building 119.

The site has been divided into two operable units for the purpose of addressing requirements of the RCRA program and they are:

Operable Unit 01 consists of the Resource Conservation and Recovery Act (RCRA) Corrective Action Program;

Operable Unit 02 consists of the Part 373 RCRA operating permit;

Operable Unit (OU) Number 01 is the subject of this document.

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.

SECTION 4: 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.

SECTION 5: SITE CONTAMINATION

The RCRA Corrective Action 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 analytical data collected on this site includes data for:

- groundwater
- soil
- soil vapor
- indoor air
- sub-slab vapor

The data have identified contaminants of concern. A “contaminant of concern” is a hazardous waste or hazardous constituent that is sufficiently present in frequency and concentration in the environment to require evaluation for remedial action. Based on the results, the Department determined that corrective measures were required to address some of the areas investigated. The RCRA Corrective Measures Study (CMS) contains a full discussion of the data.

5.1: 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 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, and the four class 2 sites 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 Interim Corrective Measures (ICMs) have been completed, with Department approval, to remove contaminant sources and plumes to the extent practical. The remaining groundwater contamination largely resides in fractured bedrock as multiple plumes on the facility. Groundwater remediation for the facility and the four class 2 sites is currently implemented under the Site Wide Closure Strategy, which hydraulically contains the contaminated groundwater. 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). Groundwater is monitored is subject to a site-wide Sampling and Analysis Plan (SAP), to ensure that the contaminated groundwater continues to be contained on-site, and to track the progress of the corrective measures program. The SAP includes an established line of compliance (LOC) monitoring well network (Figure 4), down gradient from all source areas at the Webster facility. The LOC is located on the Xerox Webster property, with a sufficient buffer from downgradient property boundaries to assure contaminated groundwater does not leave the facility boundaries. In addition, certain groundwater quality monitoring wells are monitored as "sentinel wells" and follow up action is required if defined criteria are exceeded at these location. Selected sentinel wells shall be located within a defined groundwater capture area, so that corrective measures may be reactivated if necessary.

Additionally, metals have been observed in groundwater at the Webster Facility above the guidance values in Table II-4 of the Part 373 RCRA Permit. Metals in groundwater at the Facility have been attributed to specific past manufacturing operations or from naturally occurring metals present in the site bedrock (primarily arsenic and barium). Based on the results of groundwater sampling conducted in compliance with the SAP, the concentrations of metals n groundwater exceed values established in the Facility Part 373 Permit. Metals in groundwater are also recovered by the existing groundwater migration

control trenches, treated by the local POTW, and discharged to receiving waters in compliance with the Facility operating permits. Compounds other than VOCs and metals are not required to be sampled as part of the SAP, pursuant to the approval of the Department.

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 (including the class 2 sites), 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, trichloroethene and arsenic are present on-site at levels above soil cleanup objectives (SCOs) for industrial use. Remaining contamination in the soil will be managed under a Site Management Plan (SMP). Investigations were performed within the facility boundary to determine the extent of on-site soil contamination requiring management by the SMP.

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. 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. In general investigations were performed to determine the extent of soil vapor/SVI concerns within the facility boundary.

5.2: Summary of Human Exposure Pathways

People are not drinking contaminated groundwater associated with the site because the area is served by a public water supply that obtains its water from a different source not affected by this contamination. People will not come into contact with the contaminated soil unless they perform ground-intrusive work at the site. Volatile organic compounds in the groundwater may move into the soil vapor (air spaces within the soil), which in turn may move into overlying building 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. Indoor air monitoring is ongoing at five buildings on the site to ensure that additional actions to address exposure are not needed. In addition, the potential exists for the inhalation of site contaminants due to soil vapor intrusion for any future on-site building development and occupancy.

5.3 Summary of the Remediation Objectives

The objectives for the corrective measures have been established through the remedy selection process. The goal of the corrective measures is to protect public health and the environment and achieve unrestricted use of the site to the extent feasible.

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 groundwater 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 6: INTERIM CORRECTIVE MEASURES (ICMs)

For organization purposes the Facility has historically been divided into Investigative Sites with site characterization and remediation efforts performed as needed to address identified impacts within each Site. Interim Corrective Measures have been implemented at Investigative Sites to address contaminants in soil and groundwater where a release from a Solid Waste Management Unit (SWMU) or Area of Concern (AOC) has been confirmed, and at Building 209 (Site #828068), Building 201(Site # 828080) and Nursery Area/Building 119 (Site # 828083) pursuant to the State Superfund program as class 2 sites. Interim Corrective Measures completed at the Facility were as follows:

Investigative Site W119, Nursery Area (Building 119), Site #828083 includes the Former Drum Storage Area (SWMU #63) in the old nursery. Investigative activities identified the presence of VOCs in soils and groundwater in the shallow bedrock zone. A dual phase vacuum extraction (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 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.

Investigative Site W200 includes the Solvent Degreaser Sump (SWMU #89). Characterization activities have shown that groundwater in the shallow and intermediate bedrock zones had been impacted by the Solvent Degreaser Sump, and that groundwater was contaminated with chlorinated VOCs. A DPVE system, consisting of ten wells and treatment was operated from 1992 to 2003 in this area, with operation continued 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 with approval from the Department. During the operation of the DPVE system 2300 pounds of contaminant mass (included vapor phase removed from vadose zone soils and groundwater extracted from the hydrostratigraphic units identified at the site) was removed. Currently, groundwater contamination is contained by the Building 200/208 Migration Control Trench. Groundwater is monitored and tracked under the Site-Wide Closure Strategy and the Sampling and Analysis plan.

Investigative Site W201/206/218 – 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. 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 6230 pounds of contaminant mass (included 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, down gradient 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.

Investigative Site W208 – Characterization activities identified three SWMUs in the W208/311/313 area. These are the Waste Cracking Sump (SWMU # 82), the W208 71C Degreaser Sump (SWMU # 83) and

the W313 Contamination (SWMU # 101). A DPVE system was operated, beginning in 1992 until 2003 at which time it was determined that the system had removed contaminants present in soil and groundwater to the extent practical. A system shut down request was approved by the Department. During the ICM operation, a total of approximately 1,500 pounds of contaminant mass (included vapor phase removed from vadose zone soils and groundwater extracted from the hydrostratigraphic units identified at the site) was removed from the Building 208 Investigative Site. Currently, groundwater contamination is contained by the Building 200/208 Migration Control Trenches. Groundwater is monitored and tracked under the Site-Wide Closure Strategy and the Sampling and Analysis plan.

Investigative Site 209 – Two 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 groundwater. A DPVE, consisting of 28 extraction wells with treatment, was operated from 1992 until 2003. A total of approximately 25,000 pounds of contaminant mass was removed from the Building 209 Investigative Site. The contaminant plume is stable. The Building 200/208 Migration Control Trench is located down gradient of the Building 209 area. Groundwater is monitored and tracked under the Site-Wide Closure Strategy and the Sampling and Analysis plan.

Building W338 (SWMU #97) – VOC contaminated groundwater was located near the south entrance of this power plant support building. This contamination was attributed to the use of solvent for maintenance activities performed in this area. A final RFI was completed for the SWMU. NYSDEC approved an ICM conducted in August 1997 that resulted in the excavation and offsite disposal of about 500 cubic yards of soil. After completion of the soil removal, foundation sump pumping was conducted as a remedial measure for a two (2) year period. Xerox continues foundation sump pumping activities, however, not as a remedial measure as VOC concentrations in groundwater have diminished.

OB-97 (SWMU # 96) – An isolated pocket of contamination consisting of VOCs and metals was discovered as part of the Salt Road remedial investigative activities but was not attributable to the Salt Road operations. A Corrective Measures Implementation (CMI) plan approved for this SWMU was implemented where a seasonal groundwater pumping system was operated from January 1993 to December 2003. This remedial measure was shut down at the end of the 2003 operating season with NYSDEC approval. In 2004, Xerox conducted compliance monitoring to demonstrate that contaminant levels had not increased with time in this area. This SWMU was classified as requiring no further action in 2005.

W302 Investigative Area (SWMU # 73) - In 1985, Xerox discovered that process piping inside Building 102 had incorrectly been connected to the storm sewer via the sanitary sewer. Piping changes were immediately made to tie these discharges into the sanitary sewer. Subsequently, the receiving stream for this water adjacent to Building W302 was sampled and found to have low levels of VOCs and some metals. In December 2000, Xerox removed sediment from the stream in an effort to improve site drainage. This material was managed in accordance with the site Soil Management Plan. As a result of this excavation, Xerox notified NYSDEC and additional sampling was requested. In June 2001, a sediment sampling event for the stream was completed with results submitted to NYSDEC in September 2001. This area was classified by NYSDEC as requiring no further action in 2006.

SECTION 7: 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 operation of site-wide groundwater migration control and the development of a Site Management Plan. The Site Management plan will also include the following State Superfund sites: Xerox - Building 209 (Site # 828068), Xerox - Building 201 (Site # 828080), and Xerox - Nursery Area/Building 119 (Site # 828083). The Site Management will also incorporate both the Xerox Corporation Landfill (Site # 828013) and the Salt Road Complex (Site # 828067) that have been addressed under previous decision documents.

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 or industrial 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 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 above.

Engineering Controls: asphalt and other types of covers, 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 deed restriction 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, use change from an industrial to commercial nature 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 re-occupied or developed on the site, as may be required by the Institutional and Engineering Control Plan discussed above;
- 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.

RESPONSIVENESS SUMMARY

Xerox Webster- RCRA Facility
Operable Unit No. 01
Webster, Monroe County, New York
NYD002211324/ Site No.828178

The Proposed Statement of Basis (SOB) for the Xerox Webster- RCRA Facility 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 27, 2015.

The release of the proposed SOB was announced by releasing a fact sheet via the Monroe County listserv on February 27, 2015. An announcement was also posted on DEC's Region 8 Environmental Remediation Project Information page. The website posting included a link enabling the public to directly download the proposed draft Statement of Basis.

These comments have become part of the Administrative Record for this site. The public comment period for the proposed SOB ended on March 31, 2015.

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:

Mr. Eliott Duffney of Xerox Corporation, submitted an email on March 30, 2015 which included the following comments:

COMMENT 1: On the bottom of page 2, there should be a space between the two lines describing the Xerox - Nursery area and the beginning of the next paragraph discussing the Webster Facility's operable units.

RESPONSE 1: Agreed. The change will be made in the final decision document.

COMMENT 2: On page 3 in the Site Geology and Hydrogeology section, Xerox believes the site groundwater flow direction should be changed from North direction to a North by Northwestern direction. This distinction is important in understanding migration control capabilities of down gradient blasted bedrock migration control trenches located at the facility.

RESPONSE 2: Agreed. The change will be made in the final decision document.

COMMENT 3: On page 4 mid first paragraph of the groundwater discussion, the acronym for blasted bedrock trench should be changed to read BBT not BBL.

RESPONSE 3: Agreed. The change will be made in the final decision document.

COMMENT 4: On page 5, the Soil Vapor, Indoor Air Quality and Sub-Slab Soil Vapor section should be revised as follows to pertain to all the buildings where Xerox has assessed for potential impacts to these media. These buildings include (102, 118, 119, 120, 121, 130, 141, 143, 200, 201, 206, 208, 209, 212, 214, 223, 224, 225, & 317). The assessments for soil vapor, sub slab soil vapor and indoor air were completed through a series of investigative programs conducted in 2002, 2007, 2008 and 2010 with NYSDEC and / or NYSDOH oversight.

RESPONSE 4: Agreed. The change will be made in the final decision document.

COMMENT 5: There are multiple references to restricting the use of the site to industrial uses. For example, page 9, section 3 states that covers/caps will be maintained to allow industrial use of the site. Xerox believes that the site conditions are suitable for commercial as well as industrial uses. Xerox requests that any restriction allows the potential future commercial use of the property.

RESPONSE 5: Agreed. The allowable use of the site has been changed to allow for development of the controlled property for commercial or industrial uses as defined by Part 375-1.8(g), although land use is subject to local zoning laws.

COMMENT 6: There are multiple references to the use of an environmental easement as a mechanism to restrict future use of the property. For example, page 9, section 4 calls for the imposition of institutional control in the form of an environmental easement. Xerox believes that a site deed restriction is appropriate to satisfy these requirements. The requirements of the proposed environmental easement would be satisfied by:

- the annual submittal of a periodic review report that would acknowledge compliance with the Site Management Plan approved by NYSDEC for the site.
- acknowledgement that the use and development of the property for commercial and industrial uses would be defined by Part 375-1.8(g) and that the property is subject to local zoning laws.
- the recovery and/or use of site groundwater for non-remedial purposes would be prohibited without written approval of NYSDEC and /or NYSDOH.

RESPONSE 6: The Department believes that an environmental easement is the appropriate mechanism to restrict future use of the property. The easement will make direct reference to the required use restrictions as well as to the Site Management Plan, which shall include the periodic review requirements.

COMMENT 7: On page 10 section 5a Xerox proposes that the Institutional and Engineering Control Plan allow for the use of a deed restriction in lieu of an environmental easement as described in item #6 above.

RESPONSE 7: See Response 6.

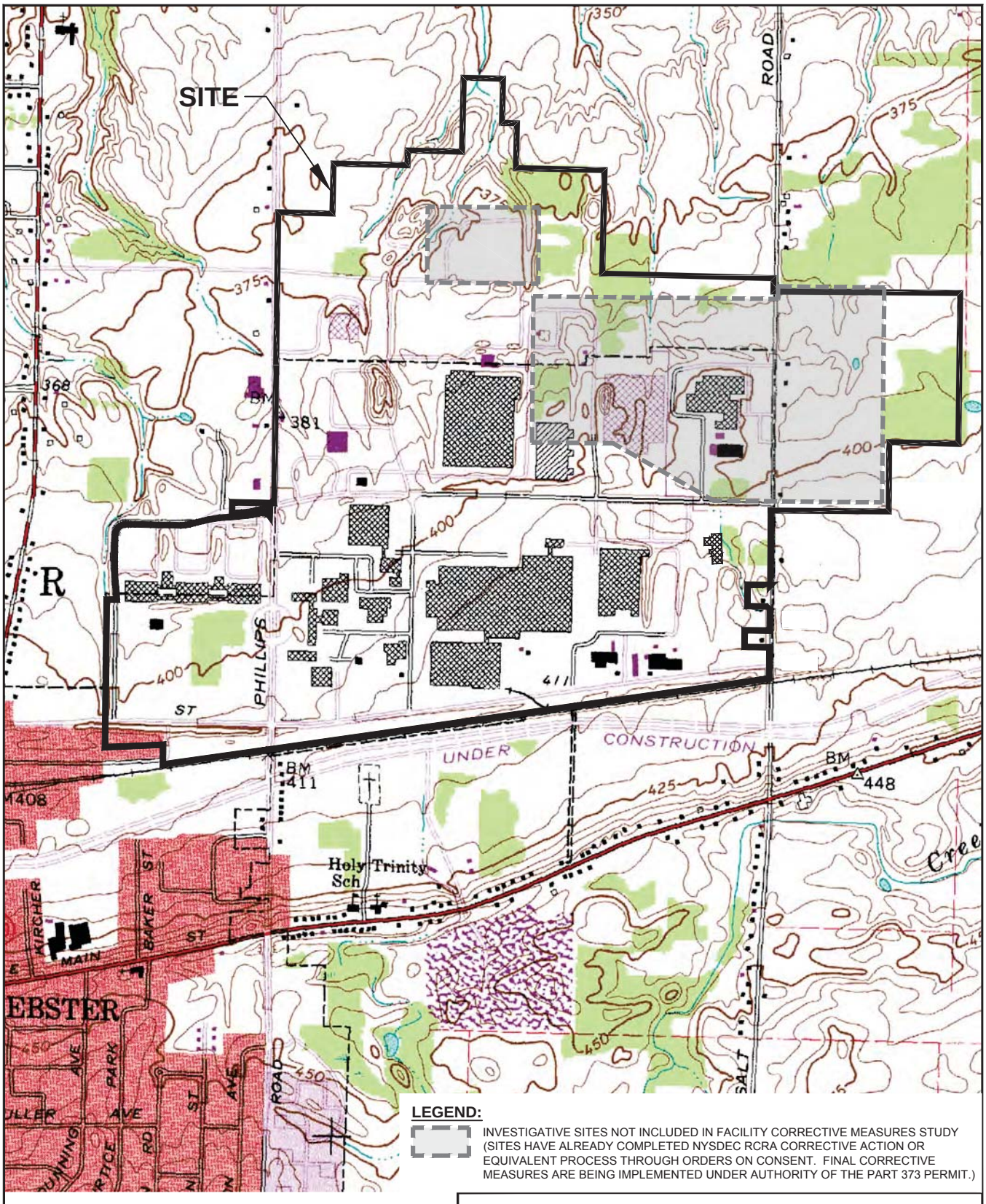
COMMENT 8: On page 10 in lieu of the creation of a separate Excavation Plan as part of the Site Management Plan, Xerox proposes to allow the usage of the existing site soil management plan. The soil management plan comprehends the management of soils for the entire property not just excavations within areas of residual contamination. The more comprehensive soil management plan is currently in

place and is part of the Facility Reference Document that was created to satisfy facility permit requirements.

RESPONSE 8: The existing site soil management will be evaluated to assess incorporation into the Site Management Plan, and whether updates or additional detail is needed.

COMMENT 9: On page 10 section 5b third bullet, Xerox desires to clarify that monitoring requirements for vapor intrusion impacts is to be limited to new building or substantial redevelopment of current site buildings. Xerox has completed several exhaustive efforts over a decade to assess the Webster facility for potential vapor intrusion impacts. Based on discussions with NYSDEC in 2014, Xerox was believed that the routine annual indoor air monitoring program that was being conducted could be terminated as we had several years of data showing compliance with indoor air standards. This section as written is unclear as to whether the continued monitoring prescribed applies only to new build and/or redevelopment scenarios.

RESPONSE 9: Agreed. Monitoring requirements for vapor intrusion impacts will include continued monitoring for vapor intrusion for existing buildings and any buildings re-occupied or developed on the site, as may be required by the Institutional and Engineering Control Plan.



U.S.G.S. QUADRANGLE: WEBSTER, 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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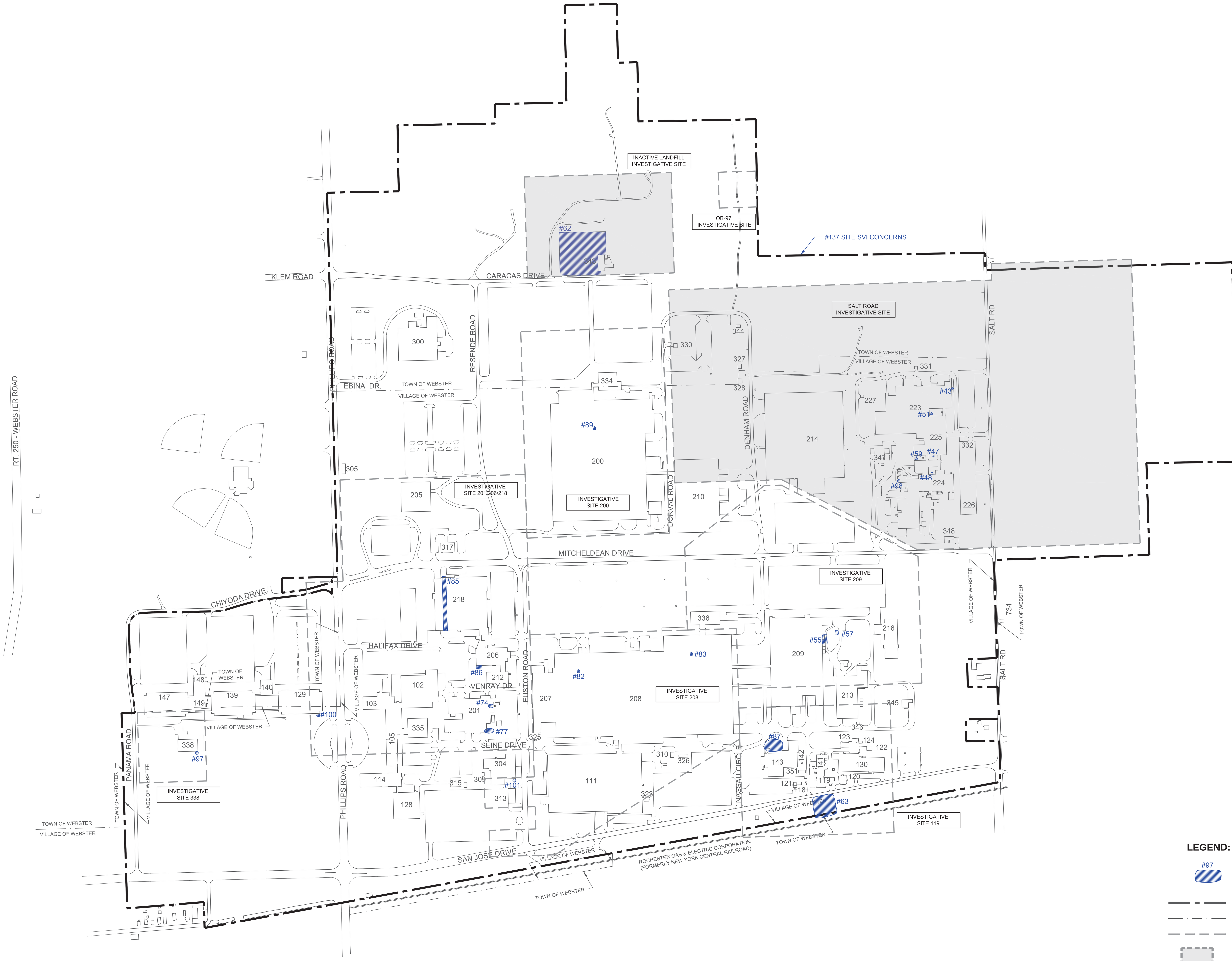
WEBSTER, NEW YORK FACILITY
CORRECTIVE MEASURES STUDY

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 (shaded area)	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.
(dash-dot line)	PROPERTY BOUNDARY
(thin dash-dot line)	TOWN/VILLAGE LINE
(dashed line)	INVESTIGATIVE SITE BOUNDARIES
(grey dashed box)	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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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\36909-117-0002-810-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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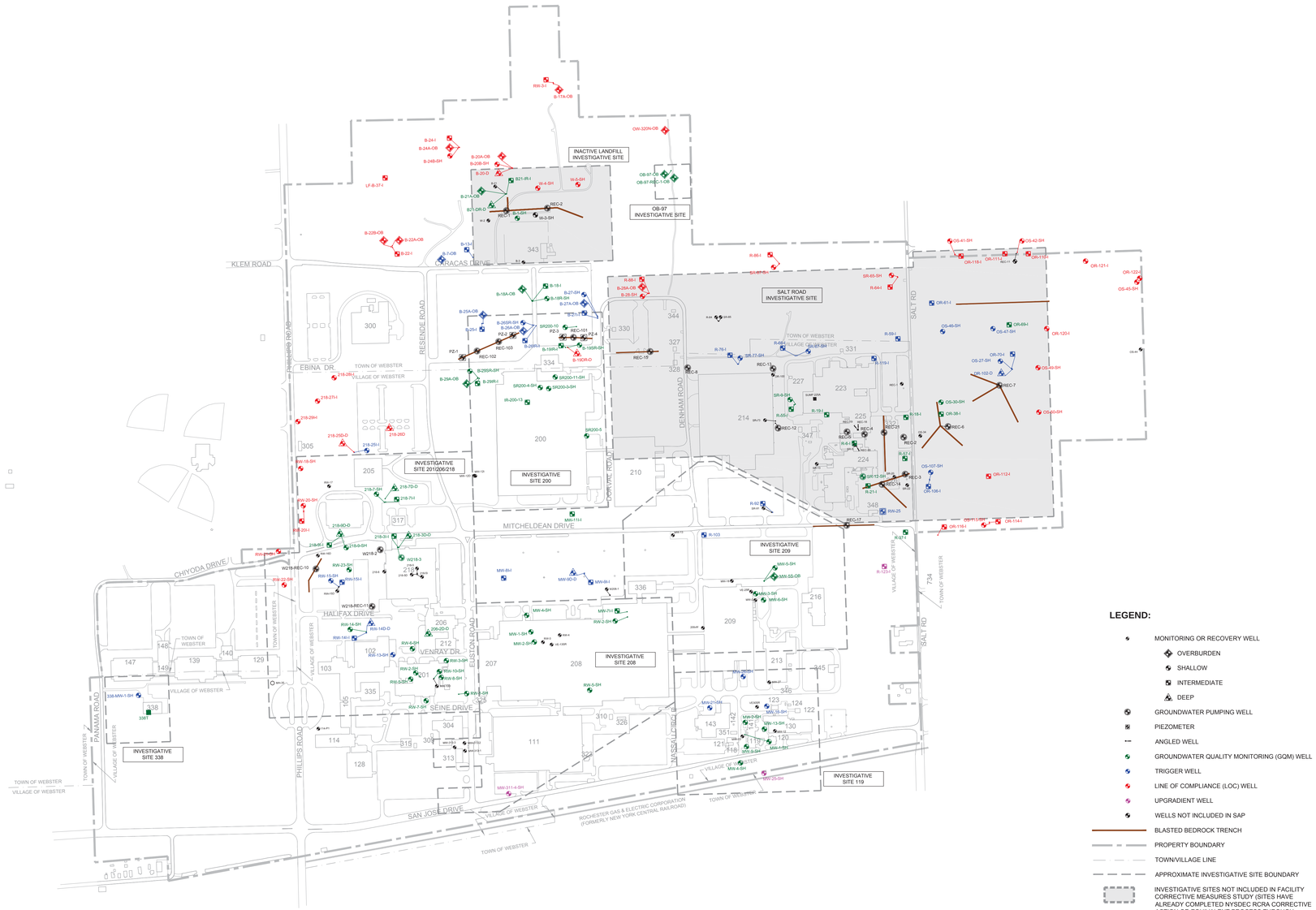
SITE-WIDE MIGRATION CONTROL SYSTEM

SCALE: AS SHOWN

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



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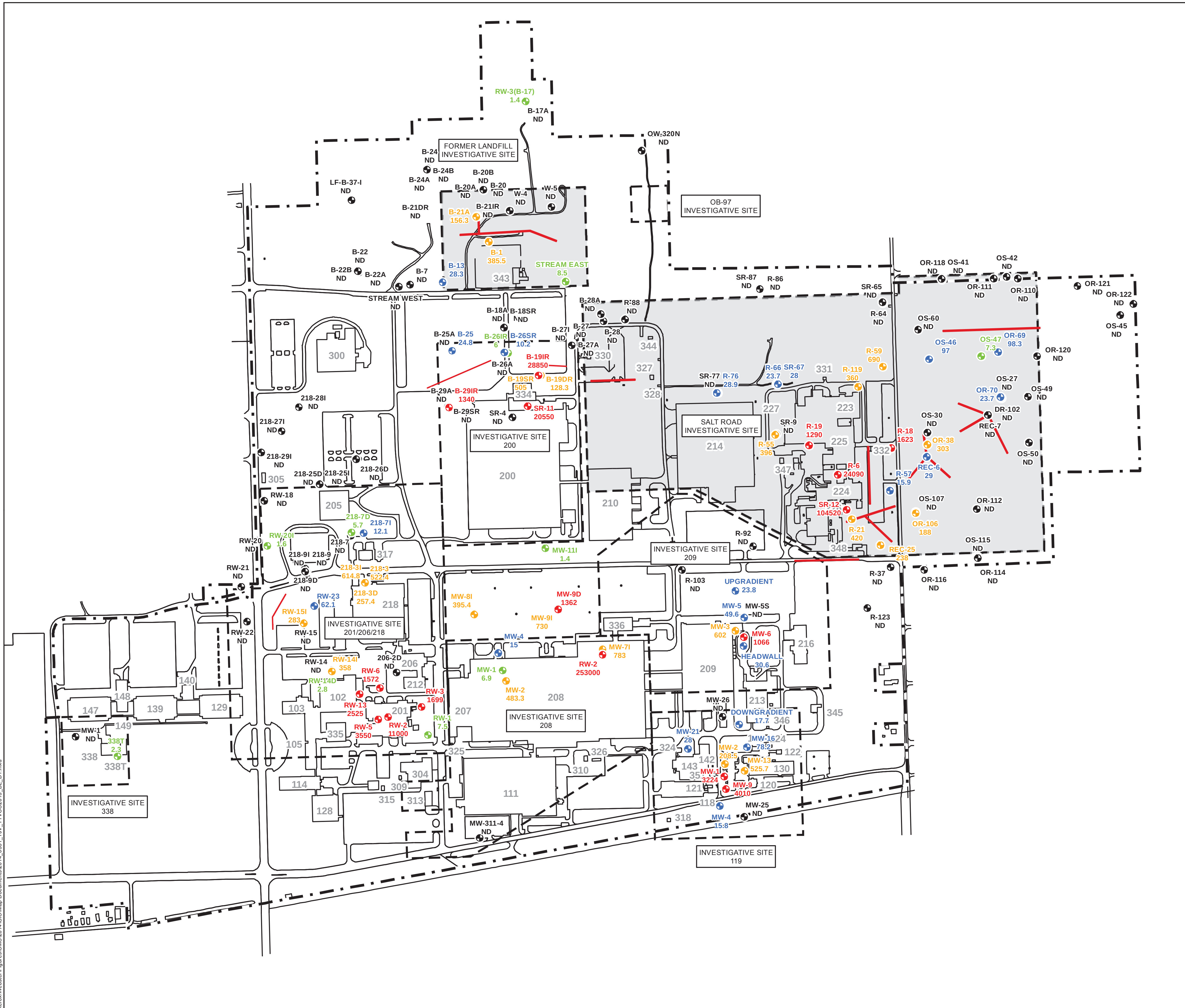
GROUNDWATER QUALITY SAMPLING PROGRAM

J:\ROCHESTER\XEROX\WEBSTER\FIGURES\CMS\2014\DRAWINGS\36909-117-0008-SMPL_PROGRAM.DWG



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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WEBSTER, NY
CORRECTIVE MEASURES STUDY

TOTAL TARGET VOLATILES POSTING MAP, 2013

SCALE: AS SHOWN
APRIL 2014

FIGURE 5