



Division of Environmental Remediation

Record of Decision
Don's Laundry Site
Town of Rotterdam Schenectady County
Site Number 4-47-024

March 1997

DECLARATION STATEMENT - RECORD OF DECISION

Don's Laundry Inactive Hazardous Waste Site Rotterdam, Schenectady County, New York Site No. 447024

Statement of Purpose and Basis

The Record of Decision (ROD) presents the selected remedial action for the Don's Laundry inactive hazardous waste disposal site which was chosen in accordance with the New York State Environmental Conservation Law (ECL). The remedial program selected is consistent with the National Oil and Hazardous Substances Pollution Contingency Plan of March 8, 1990 (40CFR300).

This decision is based upon the Administrative Record of the New York State Department of Environmental Conservation (NYSDEC) for the Don's Laundry Inactive Hazardous Waste Site and upon public input to the Proposed Remedial Action Plan (PRAP) presented by the NYSDEC. A bibliography of the documents included as a part of the Administrative Record is included in Appendix B of the ROD.

Assessment of the Site

Actual or threatened release of hazardous waste constituents from this site, if not addressed by implementing the response action selected in this ROD, presents a current or potential threat to public health and the environment.

Description of Selected Remedy

Based upon the results of the Remedial Investigation/Feasibility Study (RI/FS) for Don's Laundry and the criteria identified for evaluation of alternatives, the NYSDEC has selected No Further Action. The components of the remedy are as follows:

- The site has been reclassified as a Class 4. The contamination is being properly addressed and the site requires only continued operation of the groundwater pump and treat system, with routine inspections and monitoring of the system. No further actions are proposed beyond the continued operation of the groundwater pump and treat system.
- The selected remedy for any site should, at a minimum, eliminate or mitigate all significant threats to the public health and to the environment presented by the hazardous waste disposed at the site, through the proper application of scientific and engineering principles. This objective has been accomplished at this site. The groundwater pump and treat system is monitored to assure the proper operation of the system. The groundwater is sampled quarterly to assure that the plumes continue to be properly contained.

- The Department will continue to oversee the operation of the pump and treat system, to assure protection of the public. Routine inspections and monitoring will be in affect until clean-up goals are achieved.
- The Department will consider delisting the site from the New York State Registry of Inactive Hazardous Waste Disposal Sites when measured concentrations of the principal site contaminant, tetrachloroethylene, have been at or below NYS groundwater standards (5.0 parts per billion) for a reasonable period of time.


New York State Department of Health Acceptance

The New York State Department of Health concurs with the remedy selected for this site as being 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.

3/25/97
Date



Michael J. O'Toole, Jr., Director
Division of Environmental Remediation

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SECTION 1: SITE LOCATION AND DESCRIPTION

The Don's Laundry site, #447024, is located in Rotterdam, Schenectady County. The site is less than one half of an acre in size. The site is south of Curry Road, east of Lynn Street and south of the Rotterdam District #2 Fire Station. The neighborhood is suburban with residences west of the site (on Lynn Street). The area of contamination resulting from the disposal of tetrachloroethylene (PCE) was a long tear-drop shaped plume that was migrating across the paved parking lot in front of the Curry Road Shopping Plaza. A smaller, secondary plume of PCE was migrating from the former dry cleaner toward Lynn Street. Both plumes are being properly contained and no longer pose a threat to the residents or the environment. Please refer to figures #1 and #2 for the location map and site map, respectively.

SECTION 2: SITE HISTORY

2.1: Operational/Disposal History

The former Curry Road Shopping Plaza included several commercial rental stores, including a dry cleaning establishment. Don's Laundry operated from the 1960's until 1987. The dry cleaner was historically an "on-site" dry cleaning store that used PCE as a cleaning solvent.

It is speculated that improper disposal of PCE, near the rear door of the dry cleaner, resulted in the release of this compound into the environment.

2.2: Remedial History

April 1991; the owner of the property arranged for a soil gas survey to be conducted and the contaminated soil (the source) to be excavated. The owner's consultant then slowly vented the contamination to the atmosphere from an encapsulated cell. The cell has been dismantled and disposed of properly.

May 1992; a focused investigation was conducted by the owner to bore through the concrete floor of the former dry cleaner and look for additional contaminated soils on the site. No more soils were found that needed to be excavated.

Nov. 1994; phase two of the remedial investigation was conducted to further define the extent of contamination. Seven supplemental groundwater monitoring wells were installed by G & E Engineering, and a pilot test was conducted to establish the amount of water that could be steadily pumped from the ground to maintain a pump and treat system.

Dec. 1995; a second cell was constructed to encapsulate the drummed soils, collected during drilling activities, and slowly vent the contamination to the atmosphere. This second cell was dismantled and disposed of properly.

Jan. 1996; the groundwater pump and treat system is fully operational. Five wells in the paved parking lot and two wells near Lynn Street were hooked to the pump and treat system to hold the plume on-site. Quarterly monitoring is conducted to assure proper operation of the treatment system. Please refer to Figure #2.

May 1996; a Voluntary Agreement was signed with the volunteers to continue the pump and treat system until groundwater clean-up standards are met, or until further operation of the remedial system will not feasibly remove significant additional contamination.

SECTION 3: CURRENT STATUS

To provide long term protection against future exposures, and in response to the signed Voluntary Agreement; the consulting firm of Mobile Environmental Analytical, Inc. (MEA) continues to operate the groundwater pump and treat system. The remedial system has made significant progress toward the clean-up of the site. The pumps will soon be pulsed (turned off and then back on) every 4-5 hours, by remote control. The purpose of pulsing the pumps is to loosen additional contamination from the subsurface.

3.1: Summary of the Remedial Investigation

The purpose of the focused RI was to define the nature and extent of any contamination resulting from previous activities at the site.

The RI was conducted in two phases between December 1991 and May 1992, then November 1994 and June 1995. A report entitled **Additional Site Characterization Report** has been prepared describing the field activities and findings of the RI in detail.

The RI included the following activities:

- *Investigation of all unknown soils under the concrete floor of the building that was the former dry cleaner.*
- *Installation of soil borings and monitoring wells for analysis of soils and groundwater as well as physical properties of soil and hydro geologic conditions.*
- *Investigation of the hydraulic conditions beneath the paved parking lot to determine if a groundwater pump and treat system could operate on a continuous basis.*

To determine which media (soil, groundwater, etc.) contain contamination at levels of concern, the RI analytical data was compared to environmental Standards, Criteria, and Guidance (SCGs). Groundwater, drinking water and surface water SCGs identified for the **Don's Laundry** site were based on NYSDEC Ambient Water Quality Standards and Guidance Values and Part V of NYS Sanitary Code. NYSDEC TAGM 4046 soil cleanup guidelines for the protection of groundwater, background conditions, and risk-based remediation criteria were used as SCGs for soil.

Based upon the results of the remedial investigation in comparison to the SCGs and potential public health, certain areas and media of the site required remediation. These are summarized below. More complete information can be found in the RI Report.

3.1.1 Nature of Contamination:

As described in the RI Report; many soil and groundwater samples were collected at the Site to characterize the nature and extent of contamination. It was determined that the contaminate of concern at the Don's Laundry site was tetrachloroethylene (PCE), a solvent used in the dry cleaning of clothes.

3.1.2 Extent of Contamination

Figure 3 and Table 1 summarize the level of contamination (before remediation) for the contaminants of concern in soil and groundwater, and compares the data with the proposed remedial action levels (SCGs) for the Site. Table 2 summarizes the current level of contamination being encountered at the site. The following are the media which were investigated and a summary of the findings of the investigation:

Soil

Soil borings were conducted behind the former dry cleaner through cracked pavement. The level of contamination found was 23.0 parts per million, compared to the recommended clean-up level of 1.4 parts per million. A soil gas survey conducted in April 1991 outlined nearly 120 cubic yards of soil that needed to be excavated and treated. Excavation and controlled venting of the soil was completed in 1991.

Groundwater

Groundwater monitoring wells sampled prior to December 1991 initially indicated low levels of contamination. In 1992 (during the first phase of the formal Remedial Investigation (RI)); a well was installed in front of the dry cleaner, to determine the flow direction of groundwater. The newly installed well detected 9,000 parts per billion (ppb) of PCE compared to the groundwater standard of 5.0 ppb, and identified a new area of contamination. Trichloroethylene and methylene chloride were detected at 400 ppb each, compared to the groundwater standard of 5.0 ppb for these contaminants.

3.2 Interim Remedial Measures:

Interim Remedial Measures (IRMs) are conducted at sites when a source of contamination or exposure pathway can be effectively addressed before completion of the RI/FS. The IRMs conducted at this site included the excavation of the contaminated soils near the rear door, and the installation of the groundwater pump and treat system which controls the migration of the plume. The groundwater pump and treat system is recommended as the final remedy.

The groundwater pump and treatment system is designed to control migration of the plume. Five wells in the paved parking area, and two wells near Lynn Street are pumped at a constant rate of 2-3 gallons per minute (per well). The groundwater is pumped to the treatment system; the plume is held in-place and the levels of contamination are reduced. The treated groundwater is then discharged to the DOT stormwater system along Curry Road.

The treatment system consists of a stripper that causes the contamination to volatilize (evaporate) into the air. Carbon canisters collect the PCE from the air and the air is released to the atmosphere at a controlled rate.

3.3 Summary of Human Exposure Pathways:

This section describes the types of human exposures that may present added health risks to persons at or around the site. The remedial system installed at the site is successfully holding the contaminant plume in-place. The plume is located under pavement and there is no direct contact with the plume. The area is served by public water, and there is no known use of the groundwater in the area. The site remediation has effectively eliminated any future exposures. The groundwater will be treated until standards are achieved, or until further operation of the remedial system will not feasibly remove significant additional contamination.

3.4 Summary of Environmental Exposure Pathways:

The remedial system installed at the site is successfully holding the contamination in-place. The plume is located under pavement and no environmental exposure pathway exists.

SECTION 4: ENFORCEMENT STATUS

The NYSDEC and the volunteers entered into a Voluntary Agreement on May 8, 1996. The Order obligated the voluntary parties to continue the operation of the remedial program. The voluntary parties are in compliance with the requirements of the Voluntary Agreement and the site has been improved significantly (the significant threat no longer exists).

The site has been reclassified as a Class 4. The contamination is being properly addressed and the site requires only continued operation. No further actions are proposed beyond the continued operation of the groundwater pump and treat system.

SECTION 5: SUMMARY OF THE REMEDIATION GOALS

The selected remedy for any site should, at a minimum, eliminate or mitigate all significant threats to the public health and to the environment presented by the hazardous waste disposed at the site, through the proper application of scientific and engineering principles. This objective has been accomplished at this site. The groundwater pump and treat system is monitored by remote control to assure the proper operation of the system. The groundwater is sampled quarterly to assure that the plumes continue to be properly contained.

Based upon the results of the RI and the success of the groundwater pump and treat system, the NYSDEC is proposing no further action as the final remedy for the site. The Department will continue to oversee the operation of the pump and treat system, to assure protection of the public. Routine inspections and monitoring will be in affect until clean-up goals are achieved.

The Department will consider delisting the site from the New York State Registry of Inactive Hazardous Waste Disposal Sites at the point in time that groundwater standards for PCE (5.0 parts per billion) have been achieved and maintained for a reasonable period of time.

SECTION 6: HIGHLIGHTS OF COMMUNITY PARTICIPATION

As part of the remedial investigation process, a number of Citizen Participation (CP) activities were undertaken in an effort to inform and educate the public about conditions at the site and the potential remedial alternatives. The following public participation activities were conducted for the site:

- A repository for documents pertaining to the site was established.
- A site mailing list was established which included nearby property owners, local political officials local media and other interested parties.
- In February 1997, a public meeting was held to inform the public of the availability of the repository and to discuss the Proposed Remedial Action Plan (PRAP). Eight local residents attended the meeting and their questions were answered.
- In March 1997 a Responsiveness Summary was prepared and addressed the comments received during the public comment period for the PRAP.

Table 1
Pre-Remedial Nature and Extent of Contamination

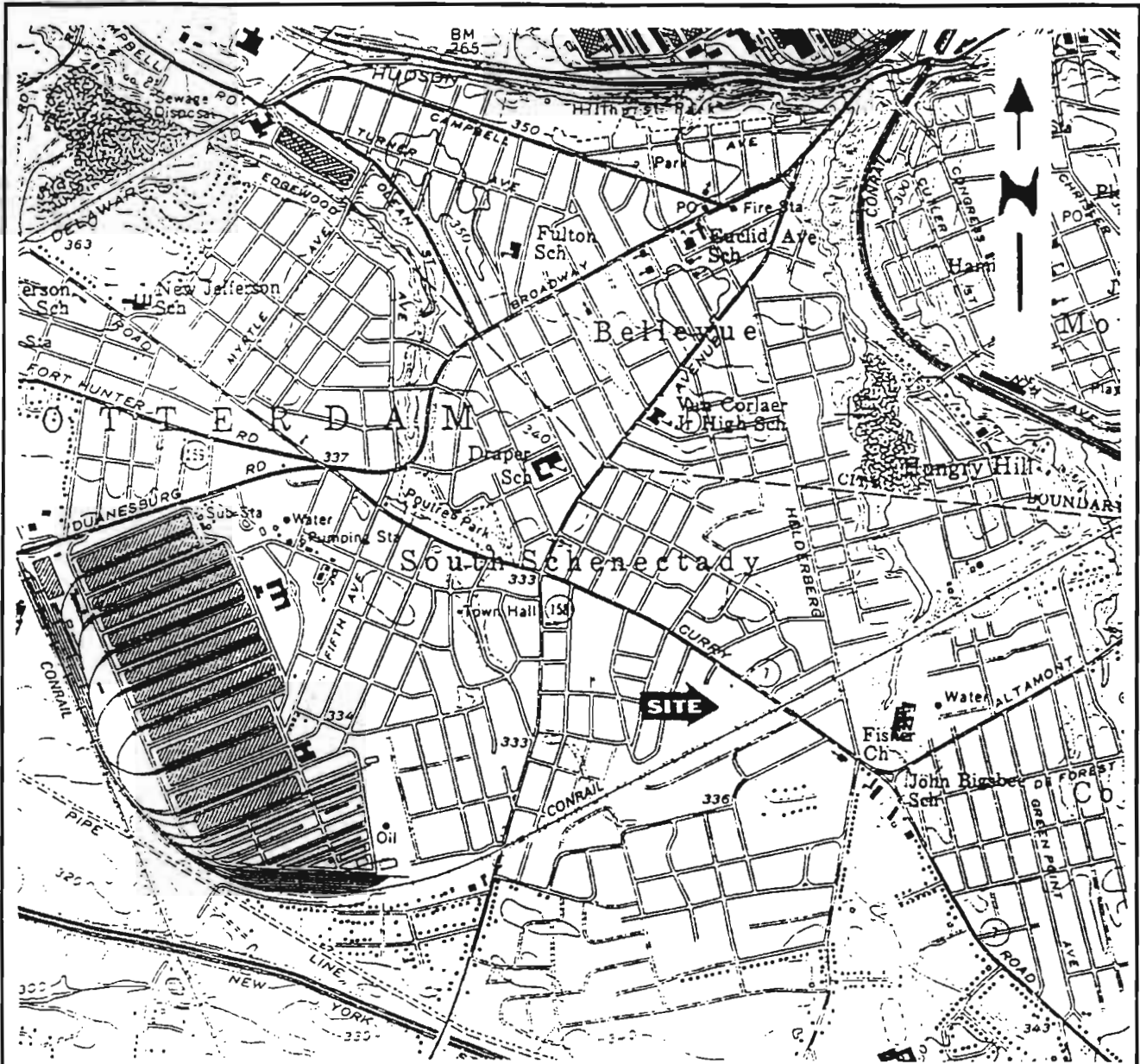
Table 1
Pre-Remedial Nature and Extent of Contamination
April 1992

MEDIA	CLASS	CONTAMINANT OF CONCERN	CONCENTRATION RANGE (ppb)	FREQUENCY EXCEEDS SCGs	SCG (ppb)
Groundwater	Volatile Organic Compounds (VOCs)	Tetrachloroethylene	ND to 9000	12 of 25	5
		Trichloroethylene	ND to 400	10 of 25	5
		Methylene Chloride	ND to 400	2 of 25	5
Soils	Volatile Organic Compounds (VOCs)	Tetrachloroethylene	ND to 23,000	19 of 50	1,400

Table 2
Current Nature and Extent of Contamination
January 1997

MEDIA	CLASS	CONTAMINANT OF CONCERN	CONCENTRATION RANGE (ppb)	FREQUENCY EXCEEDS SCGs	SCG (ppb)
Groundwater	Volatile Organic Compounds (VOCs)	Tetrachloroethylene	ND to 899	10 of 25	5
		Trichloroethylene	ND to 67	9 of 25	5
		Methylene Chloride	Not Detected	0 of 25	5
Soil	Volatile Organic Compounds (VOCs)	Tetrachloroethylene	NA	NA	1400

FIGURE 1

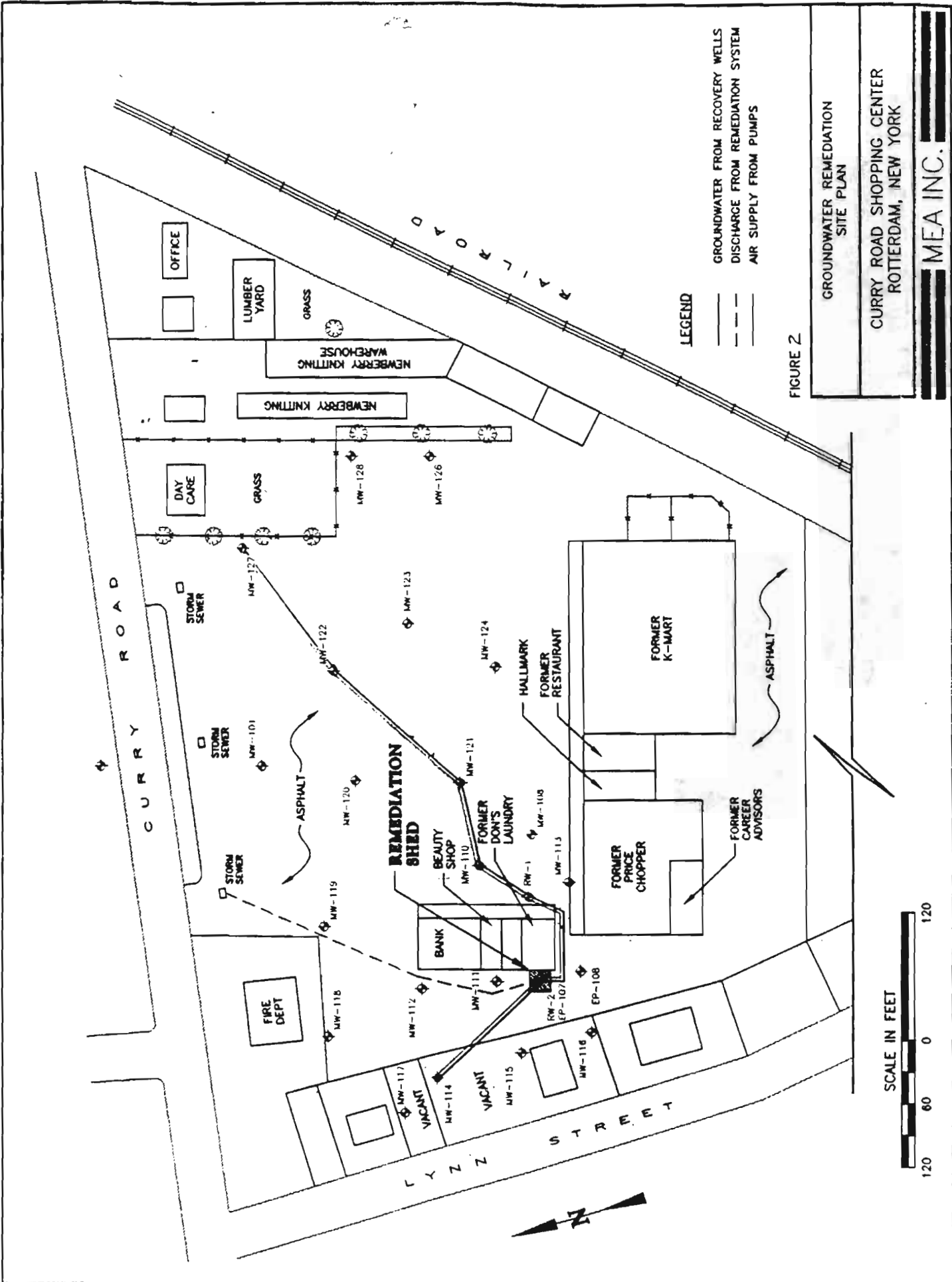


SITE LOCATION MAP

Approximate Scale: 1" = 2,000'

Curry Road Shopping Center
1410 Curry Road
Rotterdam, NY 12306

Ref: U.S.G.S. Map Rotterdam NY Quadrangle



LEGEND

- GROUNDWATER FROM RECOVERY WELLS
- - - DISCHARGE FROM REMEDIATION SYSTEM
- AIR SUPPLY FROM PUMPS

FIGURE 2

GROUNDWATER REMEDIATION
SITE PLAN

CURRY ROAD SHOPPING CENTER
ROTTERDAM, NEW YORK

MEA INC.

SCALE IN FEET



Pre-Remedial Extent of Tetrachloroethene (PCE)
Prior to Start-up of Pump and Treat System

April 1992 Data

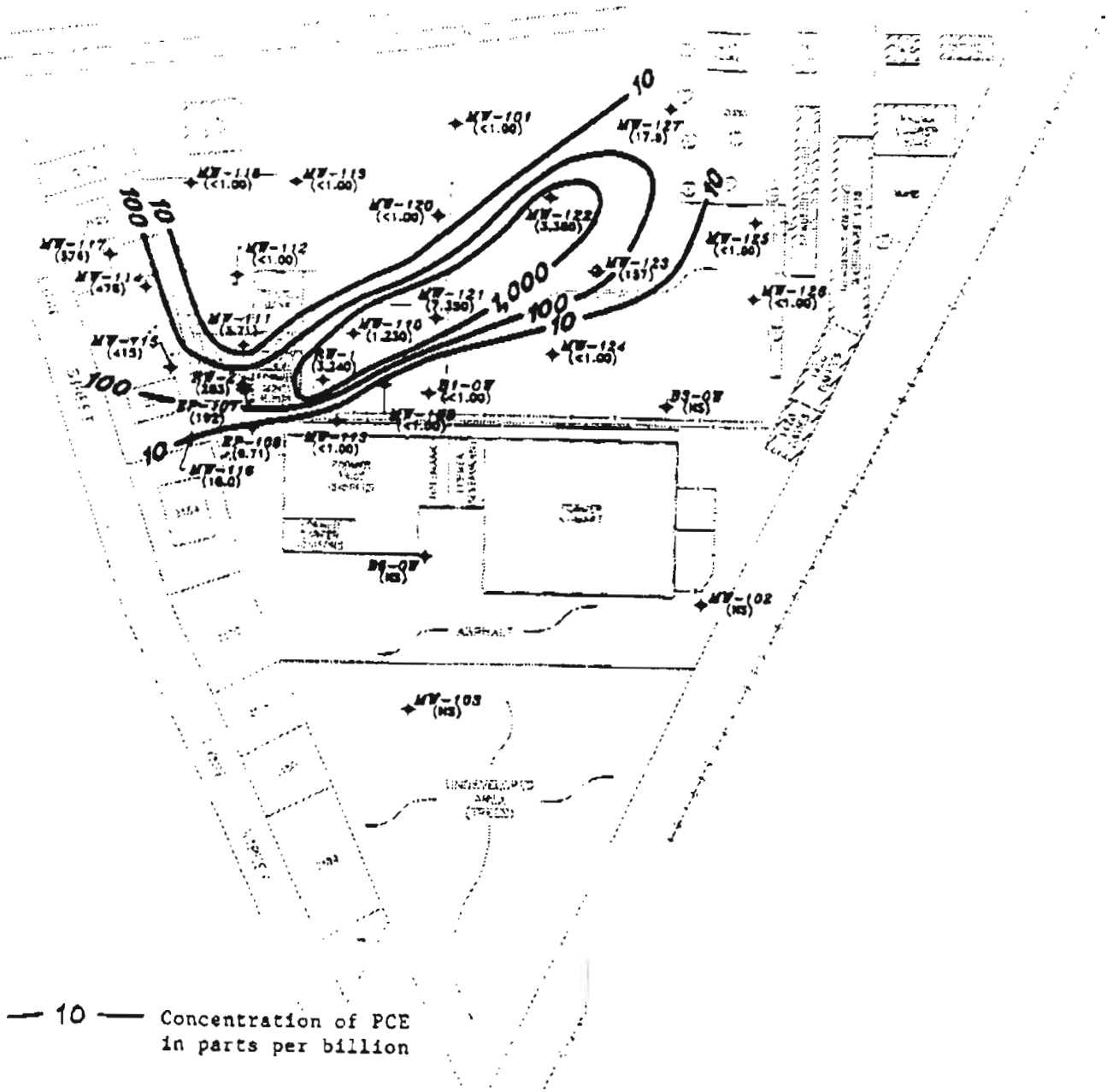
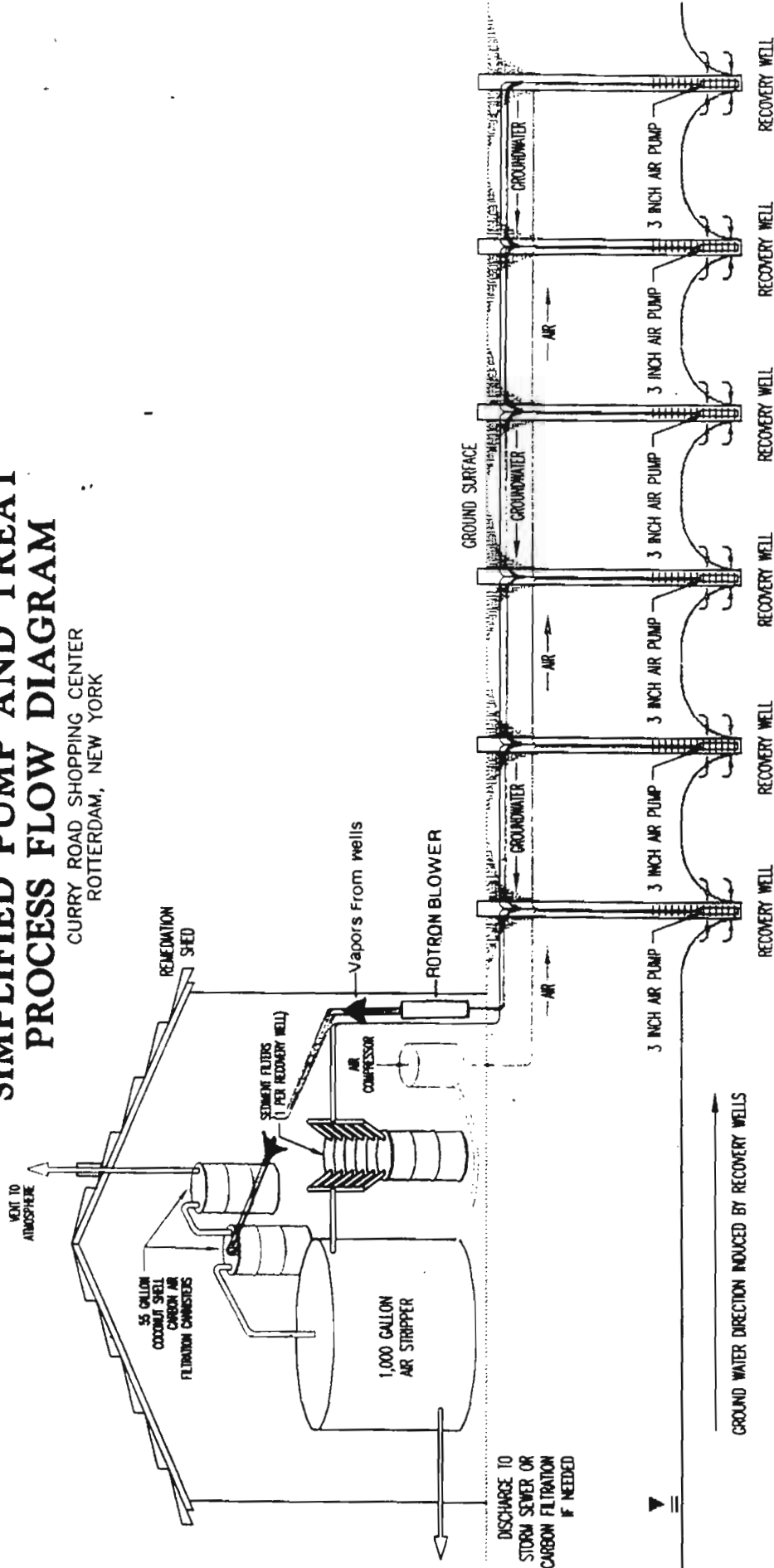


FIGURE 3

Curry Road Shopping Center
Rotterdam, New York

FIGURE 4
**SIMPLIFIED PUMP AND TREAT
 PROCESS FLOW DIAGRAM**

CURRY ROAD SHOPPING CENTER
 ROTTERDAM, NEW YORK



NOT TO SCALE

MEA INC.

APPENDIX A

RESPONSIVENESS SUMMARY

Comments were received with regard to the PRAP from February 21, 1997 to March 21, 1997. A response to each of the comments received is documented below.

1. During the public meeting held at the Region 4 Headquarters on February 27, 1997, a few of the neighbors attending the meeting asked about the risk of cancer due to human exposure. The representative from the Department of Health (DOH), Mr. Bob Griffiths, gave these neighbors the telephone number for the group of people within the DOH who track cancer incidents and the possibility of a connection with an exposure to hazardous waste.
2. No comments were received by mail.

APPENDIX B

ADMINISTRATIVE RECORD

- "Oil and Hazardous Material Site Evaluation - Proposed Retail/Commercial Development Site" January 5, 1988 by Haley and Aldrich, Inc.
- "Supplemental Oil And Hazardous Material Site Evaluation" March 6, 1989 by HAI.
- "Summary Report Of Additional Subsurface Investigations" April 30, 1992 by Environmental Products and Services, Inc.
- "SITE CHARACTERIZATION REPORT" August 1993 by G&E Engineering Inc. (consultant to J. Herzog and Sons, Inc.).
- "ADDITIONAL SITE CHARACTERIZATION WORK PLAN" May 1994 by G&E Engineering Inc. (consultant to J. Herzog and Sons, Inc.).
- "ADDITIONAL SITE CHARACTERIZATION REPORT" January 1995 by G&E Engineering.
- "ADDITIONAL SITE CHARACTERIZATION REPORT" July 1995 by G&E Engineering.
- Voluntary Agreement dated May 8, 1996 with The Golub Corporation, Clark Trading Corporation, and Golub Properties, Incorporated.
- Proposed Remedial Action Plan dated February 1997